

RSP

RiverOak Strategic Partners

6.1 Consultation Report

TR020002/APP/6.1

Project Name:

Manston Airport Development Consent Order

Regulation:

Regulation 5(2)(q) of the Infrastructure Planning
(Applications: Prescribed Forms and Procedure)
Regulations 2009, as amended, and Section 37(3)(c)
and Section 37(7) of the Planning Act 2008

Date:

July 2018

THE MANSTON AIRPORT DEVELOPMENT CONSENT ORDER

CONSULTATION REPORT

2018

**PLANNING ACT 2008 SECTION 37(3)(C) AND SECTION 37(7) AND
INFRASTRUCTURE PLANNING (APPLICATIONS: PRESCRIBED FORMS AND PROCEDURE)
REGULATIONS 2009 REGULATION 5(2)(Q)**

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CONTENTS

List of Figures

List of Tables

List of Appendices

Description of Consultation Stages referred to in this Report

Sections of the Planning Act 2008 referred to in this Report

- 1 EXECUTIVE SUMMARY
- 2 INTRODUCTION
- 3 ABOUT RIVEROAK STRATEGIC PARTNERS LIMITED
- 4 PROPOSED DEVELOPMENT OVERVIEW
- 5 CONSULTATION OVERVIEW
- 6 STAGE 1 NON-STATUTORY CONSULTATION
- 7 STAGE 2 STATUTORY CONSULTATION: CONSULTATION WITH STATUTORY CONSULTEES (SECTION 42)
- 8 STAGE 2 STATUTORY CONSULTATION: COMMUNITY CONSULTATION (SECTION 47)
- 9 STAGE 2 STATUTORY CONSULTATION: PUBLICITY (SECTION 48)
- 10 STAGE 3 STATUTORY CONSULTATION: CONSULTATION WITH STATUTORY CONSULTEES (SECTION 42)
- 11 STAGE 3 STATUTORY CONSULTATION: COMMUNITY CONSULTATION (SECTION 47)
- 12 STAGE 3 STATUTORY CONSULTATION: PUBLICITY (SECTION 48)

- 13 EIA CONSULTATION**
- 14 CONSIDERATION OF FURTHER CONSULTATION**
- 15 CONCLUSIONS**

List of Figures

Figure No.	Description
1	Location Plan
2	Plan of Existing Airport Infrastructure

List of Tables

Table No.	Description
1.1	Overview of pre-application consultation, engagement and publicity undertaken
5.1	Compliance with statutory requirements
5.2	Compliance with Department for Community and Local Government (DCLG) (now the Ministry of Housing, Communities and Local Government) Guidance 'Planning Act 2008: Guidance on Pre-application Process'
5.3	Compliance with PINS Advice Note Fourteen 'Compiling the Consultation Report'
5.4	Compliance with Department for Community and Local Government (DCLG) (now the Ministry of Housing, Communities and Local Government) Guidance 'Planning Act 2008: Application Form Guidance'
6.1	Stage 1 - Responses received at non-statutory consultation and how RiverOak had regard to the responses
7.1	Stage 2 - Volume of Section 42 Consultation responses and how the responses were received
7.2	Stage 2 - Prescribed Consultees responses and how RiverOak had regard to the responses
7.3	Stage 2 - Local Authority responses and how RiverOak had regard to the responses
7.4	Stage 2 - PILs responses and how RiverOak had regard to the responses
8.1	Stage 2 - Local Authority responses in respect of draft SoCC and how RiverOak had regard to the responses
8.2	Stage 2 - SoCC notice: newspapers and dates of publication
8.3	Stage 2 - Locations at which SoCC was available for public inspection
8.4	Stage 2 - Locations at which Community Consultation documents were available for public inspection

8.5	Stage 2 - Locations and timings of Community Consultation Events
8.6	Stage 2 - Locations and timings of additional community consultation events
8.7	Stage 2 - Locations, timings and attendee numbers of business briefings
8.8	Stage 2 - Volume of responses to Community Consultation
8.9	Stage 2 - Responses received in community consultation in response to Question 1 of the Feedback Form
8.10	Stage 2 - Summary of issues raised in community consultation in response to Question 2 of the Feedback Form and how RiverOak had regard to the responses
8.11	Stage 2 - Summary of issues raised in community consultation in response to Question 3 of the Feedback Form and how RiverOak had regard to the responses
8.12	Stage 2 - Summary of issues raised in community consultation in response to Question 4 of the Feedback Form and how RiverOak had regard to the responses
8.13	Stage 2 - Summary of issues raised in community consultation in response to Question 5 of the Feedback Form and how RiverOak had regard to the responses
8.14	Stage 2 - Summary of issues raised in community consultation in response to Question 6 of the Feedback Form and how RiverOak had regard to the responses
8.15	Stage 2 - Summary of issues raised in community consultation in response to Question 7 of the Feedback Form and how RiverOak had regard to the responses
9.1	Stage 2 - Section 48 notice: newspaper and dates of publication
9.2	Stage 2 - Consultation Advertisement: newspaper and dates of publication
10.1	Stage 3 - Volume of Section 42 Consultation responses and how the responses were received
10.2	Stage 3 - Prescribed Consultees responses and how RiverOak had regard to the responses
10.3	Stage 3 - Local Authority responses and how RiverOak had regard to the responses
10.4	Stage 3 - PILs responses and how RiverOak had regard to the responses
10.5	Stage 3 – Other organisational responses of note
11.1	Stage 3 - Local Authority responses in respect of draft SoCC and how RiverOak had regard to the responses
11.2	Stage 3 - SoCC notice: newspapers and dates of publication

11.3	Stage 3 - Locations at which SoCC was available for public inspection
11.4	Stage 3 - Locations at which Community Consultation documents were available for public inspection
11.5	Stage 3 - Locations and timings of Community Consultation Events
11.6	Stage 3 - Locations and timings of additional community consultation events
11.7	Stage 3 - Locations, timings and attendee numbers of business briefings
11.8	Stage 3 - Volume of responses to Community Consultation
11.9	Stage 3 - Summary of issues raised in community consultation in response to Question 1 of the Feedback Form and how RiverOak had regard to the responses
11.10	Stage 3 - Summary of issues raised in community consultation in response to Question 2 of the Feedback Form and how RiverOak had regard to the responses
11.11	Stage 3 - Summary of issues raised in community consultation in response to Question 3 of the Feedback Form and how RiverOak had regard to the responses
11.12	Stage 3 - Summary of issues raised in community consultation in response to Question 4 of the Feedback Form and how RiverOak had regard to the responses
11.13	Stage 3 - Summary of issues raised in community consultation in response to Question 5 of the Feedback Form and how RiverOak had regard to the responses
12.1	Stage 3 - Section 48 notice: newspaper and dates of publication
12.2	Stage 3 - Consultation Advertisement: newspaper and dates of publication

Appendix No.	Description
Stage 1 Consultation (2016)	
1	Stage 1 Media Report
Stage 2 Consultation (2017)	
2	Copy of letter to PINS with Section 46 Notification dated 12 June 2017
3	Copy of letter received from PINS confirming receipt of Section 46 Notification dated 7 July 2017
4	Copy of covering letter to Section 42 consultees (and EIA prescribed consultees) enclosing consultation pack
5	Copy of Section 48 Notice
6	Consultation Feedback Form
7	Consultation Overview Report
8	Consultation Leaflet
9	Draft Masterplan for Manston Airport
10	Manston Airport - a Regional and National Asset, Volumes I-IV; an analysis of air freight capacity limitations and constraints in the South East and Manston's ability to address these and provide for future growth
11	Outline Business Case
12	SoCC (Final)
13	Consultation Location Plan
14	Interim Consultation Report
15	List of Section 42 consultees (prescribed consultees, Local Authorities & PILs)
16	List of non-prescribed consultees (including community groups and elected representatives)
17	SoCC (Consultation Draft)
18	Copy of email sent to Local Authorities and parish and town councils regarding draft SoCC

19	Copies of letters and emails received from Local Authorities and parish and town councils during consultation on the draft SoCC for Stage 2 Consultation
20	WSP Land Referencing Diligent Inquiry Methodology
21	Copy of s.47 SoCC Notice
22	Copy of s.47 SoCC Notice, as placed
23	Table of compliance with SoCC and supporting information
24	Log evidencing when deposited consultation materials were checked
25	Stage 2 Media Report
26	Copy of Electronic Feedback Form
27	Copy of letters sent to advertise additional consultation events
28	Copy of poster sent to Parish Councils to advertise additional consultation events
29	Copy of Section 48 notice, as placed
56	2017 Consultation Zone Map
57	Copies of emails sent to those who previously expressed an interest in the Proposed Development
58	Template letters/emails to elected representatives, MPs, MEPs, councillors, local community groups and organisations
59	Visual displays at consultation events
Stage 3 Consultation (2018)	
30	Copy of letter to PINS with Section 46 Notification
31	Copy of letter received from PINS confirming receipt of Section 46 Notification
32	Copy of letter to Section 42 consultees (and EIA prescribed consultees) enclosing consultation pack
33	Copy of combined Section 47 and Section 48 Notice
34	Consultation Feedback Form
35	Introduction to the Consultation
36	Draft Masterplan for Manston Airport

37	Manston Airport - a Regional and National Asset, Volumes I-IV; an analysis of air freight capacity limitations and constraints in the South East and Manston's ability to address these and provide for future growth
38	NOT USED
39	Preliminary Environmental Information Report Non-Technical Summary 2018
40	SoCC (Final)
41	Draft Noise Mitigation Plan
42	List of Section 42 consultees (prescribed consultees Local Authorities & PILs)
43	List of non-prescribed consultees (including community groups and elected representatives)
44	Draft SoCC
45	Copy of email sent to Local Authorities and parish and town councils regarding draft SoCC
46	Copies of letters and emails received from Local Authorities and parish and town councils during consultation on the draft SoCC for Stage 3 Consultation
47	Copy of combined s.47 and s.48 Notice, as placed
48	2018 Consultation Zone Map
49	Table of compliance with SoCC and supporting information
50	Maps of event attendees' postcodes showing spread of locations of attendees
51	Copy of consultation postcard and distribution areas
52	Stage 3 Media Report
53	Copy of Electronic Feedback Form
54	Log evidencing when deposited consultation materials were checked
56	2017 Consultation zone map
57	2017- Copies of emails sent to those who expressed an interest in the Proposed Development
58	Template letters/emails to elected representatives, MPs, MEPs, councillors, local community groups and organisations

59	2017- Consultation event visual display
60	Copies of emails sent to those who previously expressed an interest in the Proposed Development
61	Template letters/emails to elected representatives, MPs, MEPs, councillors, local community groups and organisations
62	Visual displays at consultation events.
EIA Consultation	
55	Copy of the letter sent to PINS notifying them that RiverOak would provide an ES in respect of the Proposed Development

Description of Consultation Stages referred to in this Report

Stage 1	Non-statutory consultation from 30 June 2016 to 5 September 2016 undertaken prior to statutory consultation under sections 42, 47 and 48 of the PA 2008
Stage 2	Statutory consultation from 12 June 2017 to 23 July 2017 undertaken in accordance with sections 42, 47 and 48 of the PA 2008
Stage 3	Statutory consultation from 12 January 2018 to 16 February 2018 undertaken in accordance with sections 42, 47 and 48 of the PA 2008

Sections of the Planning Act 2008 referred to in this Report

Section 37	Applications for orders granting development consent
Section 42	Duty to consult specific parties
Section 43	Specifies Local Authorities for the purposes of section 42(b)
Section 44	Categories for purposes of section 42(d)
Section 47	Duty to consult local community
Section 48	Duty to publicise
Section 49	Duty to take account of responses to consultation and publicity

1 EXECUTIVE SUMMARY

Introduction

- 1.1 This Consultation Report (Report) relates to the application by RiverOak Strategic Partners Limited (RiverOak) under Section 37 of the Planning Act 2008 (PA 2008) for the Manston Airport Development Consent Order (the Proposed Development).
- 1.2 RiverOak is seeking development consent to reopen Manston Airport as a new air freight and cargo hub in the South East. The site is located within the district of Thanet in the county of Kent; the site location is shown in **Figure 1**.
- 1.3 RiverOak has been actively undertaking pre-application activities since December 2016 when it acquired all rights and interests in the Proposed Development from RiverOak Investment Corporation (ROIC), a company based in the United States. The activities undertaken by ROIC between January 2016 and December 2016 form part of the pre-application activities for the Proposed Development and as such details of them are included in this Report. The Report makes it clear which activities were undertaken by ROIC and which by RiverOak.
- 1.4 There has been an operational airport at the site since 1916. Until 1998 it was operated by the Royal Air Force as RAF Manston, and for a period in the 1950s was also a base for the United States Air Force (USAF). From 1998 it was operated as a private commercial airport (known as Kent International Airport) with a range of services including scheduled passenger flights, charter flights, air freight and cargo, a flight training school, flight crew training and aircraft testing; in the most recent years it was operating as a specialist air freight and cargo airport servicing a range of operators. Although the airport was closed in May 2014 much of the airport infrastructure, including the runway, taxiways, aprons, cargo facilities and passenger terminal remain (**Figure 2**).
- 1.5 The proposals include both the use of the existing airport infrastructure and the introduction of new facilities and are summarised in Chapter 4 below. A detailed description of the Proposed Development is provided at Chapter 3 of the ES (**document reference TR020002/APP/5.2-1**).
- 1.6 The Proposed Development is considered to be a Nationally Significant Infrastructure Project (NSIP) in accordance with the PA 2008. Further details on this can be found in application document NSIP Justification (**document reference TR020002/APP/2.3**).
- 1.7 This Report has been prepared pursuant to section 37(3)(c) of the PA 2008 which requires all applications for a DCO to be accompanied by a consultation report. It sets out how RiverOak, and ROIC, has carried out pre-application consultation on the Proposed Development, how this consultation complies with the relevant statutory requirements and guidance, the relevant responses received and how RiverOak has taken them into account in developing the Proposed Development.
- 1.8 For ease of reference, the Report deals with each strand of the consultation separately. **Table 1.1** summarises, in chronological order, the key pre-application consultation, engagement and publicity activities that have taken place since the start of the first consultation period on 30 June 2016. The table provides references to the relevant Chapters of this Report where more information can be found on the specific activities.

Consultation Overview

1.9 The consultation is summarised in Chapter 5 below. Table 1.1 sets out the timing and details of the three consultation exercises that were carried out.

Table 1.1: Overview of pre-application consultation, engagement and publicity undertaken

Stage	Statutory or Non-Statutory	Scope of consultation, engagement or publicity	When carried out	Responses	Further information
1	Non-Statutory	High-level proposals to reopen the airport as a cargo facility were presented	30 June - 5 September 2016	822	Chapter 6
2	Statutory	Full s42, s47 and s48 consultation conducted, adhering to the 2009 EIA Regulations	12 June - 23 July 2017	2225	Chapters 7-9
3	Statutory	Full s42, s47 and s48 consultation conducted, adhering to the 2017 EIA Regulations	12 January – 16 February 2018 (with some given 9 March deadline)	1349	Chapters 10-12
All				4395	

Non-Statutory Consultation

1.10 The non-statutory consultation was carried out from 30 June to 5 September 2016. The consultation was advertised in five local newspapers and via social media. The materials provided were relatively high level as the development of the project was at an early stage. Six consultation events were held, at Broadstairs, Margate and Ramsgate (in the area of Thanet District Council), Canterbury and Herne Bay (in the area of Canterbury City Council) and Sandwich (in the area of Dover District Council). 822 responses were received either in hard copy at the events, by email or by completing an on-line form. There was a high degree of support for the project in principle and a relatively small number of responses raised specific concerns, the most common being night flights (9%), passenger services (9%) and noise (8%).

Stage 2 Consultation with Statutory Consultees (Section 42)

1.11 Stage 2 Consultation with statutory consultees, community consultation and publicity were carried out simultaneously, between 12 June and 23 July 2017. 83 statutory consultees, 10 Local Authorities and 12 Parish Councils were consulted, along with 806 persons with an interest in land (PILs). Of those 911 parties, 75 responses were received (other anonymous responses could have been received) from PILs and these are treated as s47/s48 responses.

Stage 2 Community Consultation (Section 47) and Publicity (Section 48)

- 1.12 A draft SoCC was sent to four Local Authorities and ten Parish Councils, four of which replied. The comments were used to develop the full SoCC, and a summary notice was published of this. All those living within 2km of the airport boundary were sent leaflets notifying them of the consultation, as well as notices being placed in local newspapers and messages being published on social media. All those who had registered their email addresses with RiverOak were also notified of the consultation (see **Appendix 57** showing the emails sent), as well as local MPs, MEPs and councillors. The SoCC and suite of consultation documents were placed on deposit at 11 libraries (although the whole printed Preliminary Environmental Information Report was only deposited in three larger libraries due to its size).
- 1.13 All those who had signed up via the RiverOak website to receive information were notified of the consultation by email, amounting to 512 addresses by this point.
- 1.14 Seven consultation events were held, between 14 and 24 June inclusive and were attended by 1357 people between them (acknowledging that some people may have attended more than one event). Parish councils were additionally visited on request, amounting to four further events attended by 571 people between them. Two 'business briefings' were held before the Herne Bay and Broadstairs events, attended by 25 representatives of local businesses.
- 1.15 In total, 2150 responses were received either in hard copy, by email or using the online form. The form asked seven questions, including whether the respondent supported or opposed the Proposed Development, and a catch-all question for any other comments. Those who did not use the online form were analysed in the final category.
- 1.16 The responses from s42, s47 and s48 consultees covered a significant range and amplified the issues raised during the non-statutory consultation. About 63% of those who answered the first question on the online form either strongly agreed or tended to agree with the proposals.
- 1.17 To address aircraft noise, RiverOak has developed a series of commitments to limit noise in its Noise Mitigation Plan (**document reference TR020002/APP/2.4**). The masterplan (**document reference TR020002/APP/7.1**) has been refined in line with comments raised during this consultation, and the environmental assessment has taken into account the comments of statutory consultees, with whom dialogue is continuing, particular attention being paid to noise, air quality and the effect on the surface transport network. The museums will be safeguarded and allowed to expand in an area safeguarded for them, should that align with their plans.

Stage 3 Consultation with Statutory Consultees (Section 42)

- 1.18 It was decided to hold a further statutory consultation, here called Stage 3, for several reasons:
- 1.18.1 to consult on more developed proposals;
 - 1.18.2 to comply with the 2017 Environmental Impact Assessment regulations;
 - 1.18.3 to consult specifically on proposals to mitigate aircraft noise;
 - 1.18.4 to target properties under the proposed flightpath swathes near the airport specifically.

- 1.19 The Stage 2 statutory consultation generated a number of criticisms of the way the consultation was carried out. While RiverOak believe that the consultation was more than adequate, it nevertheless addressed the criticisms as part of the Stage 3 Consultation as follows:
- 1.19.1 direct notification of the consultation was increased from within a 2km contour around the site in the first statutory consultation, to postcards hand delivered to over 50,000 households, including all those under the proposed flightpath swathes near the airport, in the second;
 - 1.19.2 the information presented was more comprehensive than previously, and was supplemented by a signposting document stating where more information had been provided;
 - 1.19.3 aircraft noise was the topic of by far the most concern, this was addressed specifically through consulting on a draft of the Noise Mitigation Plan and holding additional consultation events in Ramsgate and Herne Bay, the two communities most likely to be affected by aircraft noise;
 - 1.19.4 the events were held over a longer period (8 hours) and at different times of the week than previously to allow greater attendance;
 - 1.19.5 the consultation was advertised in more local newspapers; and
 - 1.19.6 responses from local organisations have been provided with individual comments rather than being grouped with the general public responses.
- 1.20 Stage 3 Consultation with statutory consultees, community consultation and publicity were carried out simultaneously, between 12 January and 16 February 2018. 90 statutory consultees, 10 Local Authorities and 15 Parish Councils were consulted, along with 1189 persons with an interest in land (PILs). Of those 1304 parties, 52 responses were received (other anonymous responses could have been received) from PILs and these are treated as s47/s48 responses. This list of prescribed consultees will be further checked and updated as necessary ahead of notification under s.56 of the PA 2008.

Stage 3 Community Consultation (Section 47) and Publicity (Section 48)

- 1.21 A draft SoCC was again sent to four Local Authorities and ten Parish Councils, three of which replied. The comments were used to develop the full SoCC, and a summary notice was published of this. 50,000 properties in the vicinity of the airport were sent postcards notifying them of the consultation, as well as notices being placed in local newspapers and messages being published on social media. All those who had registered their email addresses with RiverOak were also notified of the consultation (by now amounting to over 2000 emails) (see **Appendix 60** showing the emails sent), as well as local MPs, MEPs and councillors. The SoCC and suite of consultation documents were placed on deposit at 11 libraries (although the whole printed Preliminary Environmental Information Report was only deposited in three larger libraries due to its size).
- 1.22 All those who had signed up via the RiverOak website to receive information were notified of the consultation by email, amounting to 2600 addresses by this point.

- 1.23 Two further consultation events were held, on 23 and 24 January and were attended by 869 people between them (acknowledging that some people may have attended both events).
- 1.24 In total, 1318 responses were received either in hard copy, by email or using the online form. The form asked five questions, including a catch-all question for any other comments. Those who did not use the online form were analysed in the final category.
- 1.25 The responses from s42, s47 and s48 consultees covered a significant range and amplified the issues raised during the non-statutory consultation and Stage 2 Consultation.
- 1.26 The Noise Mitigation Plan (**document reference TR020002/APP/2.4**) was amended to increase the mitigation as a result of the consultation. The Environmental Statement based on the Preliminary Environmental Information Report, was amended in line with the comments made in particular in the new areas of climate change, major accidents and disasters, and health, on which comments were specifically requested.

Conclusions

- 1.27 RiverOak, and previously ROIC, has adopted a three-staged approach to consultation for the Proposed Development with one non-statutory phase and two statutory phases being undertaken in accordance with the requirements of the statutory Statement of Community Consultations (SoCC), the PA 2008, the Infrastructure Planning Applications: Prescribed Forms and Procedure Regulations 2009, as amended (Application Regulations), and in line with DCLG Guidance and Planning Inspectorate advice.
- 1.28 All representations received during the non-statutory and statutory pre-application consultation stages have been considered by RiverOak and taken into account in the development and refinement of the Proposed Development. RiverOak has taken great care to analyse and give detailed consideration to all feedback received. This Consultation Report shows how the feedback received has influenced and improved RiverOak's thinking on the design and delivery of the Proposed Development.
- 1.29 The three consultation exercises generated in excess of 800, 2200 and 1300 responses respectively; this volume of response coupled with the level of detail raised within the responses (as set out in this document) is clear evidence that the consultations were well-publicised and contained a sufficient amount of information for informed points to be made. Further consultation was considered following the withdrawal of the April 2018 application but was not thought necessary (see chapter 14).
- 1.30 The main changes to the Proposed Development in response to feedback received during consultation include:
- 1.30.1 amendments to the masterplan for the airport;
 - 1.30.2 further and more detailed assessments undertaken as part of environmental impact assessment
 - 1.30.3 additional application documents provided, such as an NSIP Justification and a CAA Interface Document; and

- 1.30.4 a Noise Mitigation Plan drawn up, consulted upon during Stage 3 and then amended following feedback, cutting the night-time Quota Count by nearly 50%.

2 INTRODUCTION

- 2.1 This Report forms part of RiverOak's application to the Secretary of State for the Manston Airport Development Consent Order. It has been produced pursuant to sections 37(3)(c) and 37(7) of the PA 2008 which requires all applications for a DCO to be accompanied by a report giving details of what has been done by the applicant in compliance with sections 42, 47 and 48 of the PA 2008 (pre-application consultation and publicity), any relevant responses received and the account the applicant has taken of any relevant responses.
- 2.2 This Report also explains how RiverOak has complied with guidance issued by DCLG in undertaking its pre-application consultation.
- 2.3 RiverOak and ROIC carried out three stages of consultation: one stage of non-statutory consultation (Stage 1) and two stages of statutory consultation (Stages 2 and 3). Stage 1 was undertaken by ROIC from 30 June 2016 to 5 September 2016, Stage 2 was undertaken from 12 June to 23 July 2017 and Stage 3 was undertaken from 12 January to 16 February 2018.
- 2.4 Both of the statutory stages of consultation (Stages 2 and 3) aligned sections 42, 47 and 48 requirements to run in parallel.
- 2.5 During statutory consultation, RiverOak consulted relevant Local Authorities, prescribed consultees, Persons with an interest in Land (PILs) as well as members of the local community living in the vicinity of the land on the key elements of its proposed DCO application. The proposed application was also publicised in accordance with Section 48 of the PA 2008. Although a single, 28-day statutory consultation is recommended, in this instance, RiverOak ran two stages of statutory consultation running 42 and 36 days respectively.
- 2.6 RiverOak produced and sought Local Authority opinion on draft SoCCs ahead of both stages of statutory consultation. RiverOak consulted relevant Local Authorities and parish and town councils on the draft SoCC for Stage 2 between the 10 February 2017 and the 10 March 2017 and the draft SoCC for Stage 3 between 24 November 2017 and 22 December 2017 prior to publication as required under Section 47. Each stage of community consultation was carried out in accordance with the final SoCC as published (see **Appendices 12 and 40**).
- 2.7 This Report provides a summary of the non-statutory consultation undertaken followed by a detailed account of the two stages of statutory consultation undertaken including the responses received and an explanation of how RiverOak has taken these responses into account. For ease of reference, the Report deals with each strand of the consultation separately. It also aims to assist the reader by grouping the summary of responses by issue where appropriate.
- 2.8 RiverOak would like to thank each consultee who has taken the time to consider the various consultation documentation at each stage of consultation and respond to RiverOak's consultations. Each response, feedback and suggestion has been considered and has informed the ongoing design and development of the Proposed Development.
- 2.9 This Consultation Report shows how RiverOak has had regard to responses received during consultation. Whilst RiverOak has read each individual response received, this Report is not intended to replicate and set out each response received. Rather, its aim is to provide an accurate overview, with detail where necessary, of the content of the responses received and to show how they have influenced the Proposed Development.

3 ABOUT RIVEROAK

- 3.1 The project is being promoted by RiverOak, a company registered in the UK (company number 10269461). It was formerly promoted by RiverOak Investment Corporation, a US company registered in Delaware, but in December 2016 an agreement between the two entities transferred all responsibility, right and liabilities in relation to the project from the US to the UK company. RiverOak is a special purpose vehicle with a consortium of investors.

4 PROPOSED DEVELOPMENT OVERVIEW

Description of the Proposed Development

- 4.1 The application site is situated to the west of Ramsgate in Kent and the area of permanent acquisition comprises approximately 303.2 hectares (ha) (749.2 acres). RiverOak plans to reopen and develop Manston Airport into a dedicated air freight facility able to handle at least 10,000 air cargo movements per year whilst also offering passenger, executive travel, and aircraft engineering services.
- 4.2 To achieve this, RiverOak is proposing a multimillion-pound, four-phase construction and redevelopment plan, which will be delivered across an estimated 15 years.
- 4.3 The proposals include both the use of the existing airport infrastructure and the introduction of new facilities. In summary, the proposals include:
 - 4.3.1 upgrade of Runways (10/28) and re-alignment of the parallel taxiway (Alpha) to provide European Aviation Safety Agency (EASA) compliant clearances for runway operations;
 - 4.3.2 construction of 19 EASA compliant Code E stands for air freight aircraft with markings capable of handling Code D and F aircraft in different configurations;
 - 4.3.3 construction of 65,500m² of cargo facilities;
 - 4.3.4 construction of a new air traffic control tower;
 - 4.3.5 construction of a new airport fuel farm;
 - 4.3.6 construction of a new airport rescue and firefighting service station;
 - 4.3.7 development of the Northern Grass area for airport related businesses;
 - 4.3.8 highway improvement works; and
 - 4.3.9 extension of passenger service facilities including an apron extension to accommodate an additional aircraft stand and increasing the current terminal size.
- 4.4 RiverOak's proposals also retain and enhance the existing RAF Manston and Hurricane and Spitfire museums by creating a museum quarter on the site of the former air traffic control tower.
- 4.5 RiverOak's proposals include passenger and apron facilities for at least one based passenger carrier, although the aim will be to attract a number of low cost carriers as well as charter and scheduled flights.
- 4.6 The development of passenger services will be distinct and separate from the focus on building the air freight operation. This will ensure the cargo carriers are provided with a dedicated and swift service to maximise the economic potential of Manston Airport.
- 4.7 In addition to the air freight hub RiverOak proposes to develop:

- 4.7.1 an aircraft maintenance, repair and overhaul facility and end-of-life recycling facilities;
 - 4.7.2 a flight training school;
 - 4.7.3 a fixed base operation for executive travel; and
 - 4.7.4 business facilities for aviation related organisations.
- 4.8 Manston Airport no longer has an aerodrome licence. The Airport will need a new EASA Certificate from the Civil Aviation Authority (CAA), and other consents such as an airspace change proposal, to be brought back into aviation use. The process of obtaining these consents will run alongside the DCO application process and a decision on them will be made by the CAA rather than the Secretary of State.

Need for the Proposed Development

- 4.9 The need for the Proposed Development is set out in the Azimuth Report (**document reference TR020002/APP/7.4**) and the Statement of Reasons (**document reference TR020002/APP/3.1**).

5 CONSULTATION OVERVIEW

Introduction

- 5.1 This Chapter provides a general description of the consultation process undertaken by RiverOak and ROIC in respect of the Proposed Development and details how RiverOak has satisfied the requirements of the relevant statute and guidance. It should be read in conjunction with **Table 1.1**.

RiverOak's approach to Consultation

- 5.2 RiverOak's approach was to carry out three stages of consultation. Stage 1 was carried out during summer 2016 whilst the Proposed Development was still at an early stage in its development. Having considered the feedback from Stage 1 Consultation, as well as continuing with technical and environmental surveys, RiverOak carried out Stage 2 Consultation in summer 2017 on more detailed proposals. Stage 3 Consultation was carried out at the beginning of 2018 to provide consultees with more detailed environmental information and a further opportunity to comment on the proposals which had been updated taking into account responses to the summer 2017 consultation.
- 5.3 Stage 1 Consultation was non-statutory, in that it was not carried out to fulfil the requirements of the PA 2008. Stages 2 and 3 were 'statutory consultations', which are required to fulfil the requirements identified in the Act.
- 5.4 Using a wide range of communications and feedback methods, RiverOak aimed to consult residents and businesses in the surrounding area of the Manston Airport site at meaningful stages in the development of the Proposed Development proposals. A combination of direct mail (letters, postcards and emails), media advertising and editorial, social media activity, a dedicated Proposed Development website and helpline, as well as advice sought from Local Authorities and Parish Councils on how to consult appropriately, was used to ensure stakeholders were informed of the consultations and had the opportunity to contribute to them.
- 5.5 During all stages of consultation, RiverOak aimed to make information regarding the proposals widely available in local libraries, as well as online. Local communities, businesses, other stakeholders and the wider public were invited to take part in the consultations, to encourage feedback from a diverse range of stakeholders.
- 5.6 Full details of the activities carried out during all three stages of consultation can be found below.

Overview of consultation stages

- 5.7 RiverOak conducted consultation in three main stages:
- 5.7.1 Stage 1, non-statutory consultation which was carried out between the 30 June and the 5 September 2016. Throughout this time RiverOak made consultation documents available online and advertised the consultation in the local newspaper and through social media campaigns and announcements on Facebook and Twitter.
- 5.7.2 Stage 2, statutory consultation which was carried out between the 12 June and the 23 July 2017, a period of 42 days. During Stage 2 Consultation, RiverOak consulted

the statutory consultees set out in section 42 as well as members of the local community living in the vicinity of the land as prescribed by section 47. The proposed application was also publicised in accordance with Section 48 of the PA 2008.

5.7.3 Stage 3, statutory consultation which was carried out between the 12 January and the 16 February 2018, a period of 35 days. As with Stage 2, during Stage 3 Consultation, RiverOak consulted the statutory consultees set out in section 42 as well as members of the local community living in the vicinity of the land as prescribed by section 47. The proposed application was also publicised in accordance with Section 48 of the PA 2008.

5.8 Further detail regarding the Stage 1 consultation process and the relevant responses received is provided in Chapter 6 of this Report.

5.9 Further detail regarding the Stage 2 Consultation process and the responses received is provided in Chapters 7 to 9 of this Report.

5.10 Further detail regarding the Stage 3 Consultation process and the responses received is provided in Chapters 10 to 12 of this Report.

Satisfying Statutory Requirements

5.11 RiverOak considers that it has complied with all relevant statutory requirements and other guidance. **Table 5.1** below sets out the relevant statutory requirements and guidance and how RiverOak has complied with them. **Table 5.2** and **5.3** that follow set out how DCLG Guidance and PINS advice has also been complied with.

Table 5.1: Compliance with statutory requirements

Statutory provision	Statutory requirement	Activity undertaken	Date undertaken
PA 2008			
42(1)(a)	Duty to consult prescribed consultees	<p>All prescribed consultees were written to at the commencement of both stages of the Statutory Consultation and provided with consultation documentation.</p> <p>More detailed information on the consultation with prescribed consultees can be found in Chapters 7 and 10 of this report.</p>	<p>Stage 2: 9 June 2017 (Consultation commenced on 12 June 2017)</p> <p>Stage 3: 12 January 2018 (Consultation commenced on 12 January 2018)</p>
42(1)(aa)	Duty to consult the Marine Management Organisation if the Proposed Development would affect, or would be likely to affect any of the areas specified in section 42(2) of the PA 2008	The Proposed Development is not expected to affect or be likely to affect any of the areas specified in section 42(2) of the PA 2008. The MMO have therefore not been consulted.	Not applicable
42(1)(b)	Duty to consult each Local Authority that is within section 43(1)	<p>The Section 43 consultees were written to at the commencement of Stage 2 and Stage 3 Consultation and were provided with all of the consultation documentation.</p> <p>More detailed information on the consultation with section 43(1) consultees can be found in Chapters 7 and 10 of this report.</p>	<p>Stage 2: 9 June 2017 (Consultation commenced on 12 June 2017)</p> <p>Stage 3: 12 January 2018 (Consultation commenced on 12 January 2018)</p>

42(1)(c)	Duty to consult the Greater London Authority if the land is in Greater London	The Proposed Development is not within Greater London. The GLA have therefore not been consulted.	Not applicable
42(1)(d)	Duty to consult each person within one or more of the categories set out in section 44 of the PA 2008	<p>All identified PILs were consulted at the commencement of the Stage 2 Statutory Consultation in June 2017.</p> <p>The list of PILs was revised between the Stage 2 and Stage 3 Consultations to take into account changes to the red line boundary, additional landowner information received and changes to ownership in the period between the Stage 2 and Stage 3 Consultation.</p> <p>Further PILs were identified due to changes to the noise contours at the Stage 3 Consultation which increased the number of PILs. These additional PILs were sent letters on the 5 February 2018 and were given an extended consultation deadline of the 9 March 2018 to ensure they had 28 days to respond.</p> <p>The Book of Reference is provided as document TR020002/APP/3.3 of the DCO submission.</p>	<p>Stage 2: 9 June 2017 (Consultation commenced on 12 June 2017)</p> <p>Stage 3: 12 January 2018 (Consultation commenced on 12 January 2018). Additional PILs identified were consulted on 5 February 2018 and given until 9 March 2018 to respond, a total of 32 days.</p>
45(1) & (2)	Notification of the deadline for the receipt of responses which must not be earlier than 28 days	<p>For Stage 2 Consultation, the deadline for the receipt of responses was the 23 July 2017 (giving a 42 day consultation period).</p> <p>For Stage 3 Consultation, the deadline for the receipt of responses was the 16 February 2018 (giving a 36 day consultation period). For additional PILs identified during the 2018 consultation, an extended</p>	<p>Stage 2 Consultation commenced on 12 June 2017 and the deadline was 23 July 2017.</p> <p>Stage 3 Consultation commenced on the 12 January 2018 and the</p>

		<p>consultation deadline was set of the 9 March 2018 to ensure these consultees had 28 days to respond</p> <p>This information was stated in writing in the letters sent to consultees (See Appendices 4 and 32) and in the Stage 2 Consultation Leaflet (see Appendix 8) and Stage 3 Introduction to the Consultation (see Appendix 35).</p>	<p>deadline was the 16 February 2018.</p> <p>Additional PILs were consulted on the 5 February and were asked to provide feedback by the 9 March 2018.</p>
46(1) & (2)	<p>Duty to supply the Secretary of State with such information in relation to the proposed application as the Applicant would supply to the Secretary of State for the purpose of complying with section 42 if the Applicant were required by that section to consult the Secretary of State about the proposed application, and to do so on or before commencing consultation under section 42</p>	<p>PINS were notified in writing by letter at the beginning of both stages of Statutory Consultation (See Appendices 2 and 30) and provided with the same consultation documents as the section 42 consultees.</p>	<p>Stage 2: Section 46 Notice was submitted to PINS on 9 June 2017 (it was returned in the post and hand delivered on 15 June)</p> <p>Stage 3: Section 46 Notice was submitted to PINS on 11 January 2018</p>
47(1)	<p>Duty to prepare a SoCC</p>	<p>RiverOak produced SoCCs in compliance with the statutory requirements for both stages of Statutory Consultation. Further details can be found in Chapters 8 and 11.</p>	<p>Stage 2: Final SoCC published 26 May 2017</p> <p>Stage 3: Final SoCC published 5 January 2018</p>
47(2)	<p>Duty to consult relevant Local Authorities on the SoCC</p>	<p>Prior to preparing the SoCCs RiverOak consulted all relevant Local Authorities on the contents of the draft SoCCs prepared for Stages 2 and 3 Consultation, including Thanet District Council (TDC), Kent County</p>	<p>Stage 2: 10 February 2017</p>

		<p>Council (KCC), Dover District Council (DDC), Canterbury City Council (CCC) and 12 nearby parish and town councils who may be interested in the Proposed Development.</p> <p>Details of the consultation can be found in Chapters 8 and 11 of this report. Copies of the emails sent to the Local Authorities can be found at Appendices 18 and 45.</p>	<p>Stage 3: 24 November 2017</p>
47(3)	<p>Deadline for the receipt by the Applicant of a Local Authority's response to consultation on the SoCC is the end of the period of 28 days that begins with the day after the day on which the Local Authority receives the consultation documents.</p>	<p>RiverOak consulted relevant Local Authorities on the Stage 2 Consultation SoCC on 10 February 2017 and requested responses by the 10 March 2017.</p> <p>Relevant Local Authorities were consulted on the Stage 3 Consultation SoCC on 24 November 2017 and responses were requested by the 22 December 2017.</p> <p>This gave the full 28 day period specified in section 47(3) for both SoCC consultations.</p>	<p>Stage 2: Responses requested by 10 March 2017</p> <p>Stage 3: Responses requested by 22 December 2017</p>
47(5)	<p>Duty to have regard to any response to consultation under section 47(2) on the draft SoCC that is received by the applicant before the deadline imposed by section 47(3).</p>	<p>Comments were received from four of the 16 Local Authorities and Parish Councils consulted on the Stage 2 Consultation draft SoCC and three of the Local Authorities and Parish Councils on the Stage 3 Consultation draft SoCC.</p> <p>Comments were taken into consideration and both SoCCs were amended as appropriate prior to the final SoCCs being published.</p>	<p>Comments from the Local Authorities were taken into account when preparing the final SoCCs for both Stages 2 and 3 Consultation.</p>

		<p>Tables 7.3 and 11.3 below set out RiverOak's response to the comments raised by the Local Authorities and Parish Councils.</p> <p>The final Stage 2 Consultation SoCC can be found at Appendix 12 and the final Stage 3 Consultation SoCC can be found at Appendix 40.</p>	
47(6)	<p>Duty to:</p> <p>(1) make the SoCC available for inspection by the public in a way that is reasonably convenient for people living in the vicinity of the land;</p> <p>(2) publish in a newspaper circulating in the vicinity of the land, a notice stating where and when the SoCC can be inspected; and</p> <p>(3) publish the SoCC in such manner as may be prescribed.</p>	<p>Both the Stage 2 Consultation and Stage 3 Consultation SoCCs were made available for inspection by the public online, at public libraries and at consultation events. Provision was also made for hard copies to be provided on request. Further details are provided in Chapters 8 and 11 of this report.</p> <p>SoCC notices were published in the Thanet Gazette newspaper which explained where and when the SoCCs could be inspected. Further details can be found in Chapters 8 and 11 of this Report and copies of the SoCC notices are provided at Appendices 21 and 33).</p>	<p>Stage 2: SoCC made available for inspection from 26 May to 23 July 2017. SoCC notice published on the 26 May 2017</p> <p>Stage 3: SoCC made available for inspection from 5 January 2018. SoCC notice published on 5 January 2018.</p>
47(7)	<p>Duty to carry out consultation in accordance with the proposals set out in the SoCC.</p>	<p>RiverOak undertook both stages of statutory consultation in accordance with the proposals set out in the relevant SoCCs. In addition, at the request of the local community, RiverOak also carried out a number of additional community events during Stage 2 Consultation. This is described more fully in Chapter 8.</p> <p>The tables at Appendices 23 and 49 set out in detail how RiverOak undertook the consultation in</p>	<p>Stage 2: 12 June to 23 July 2017</p> <p>Stage 3: 12 January to 16 February 2018</p>

		accordance with the SoCC and explains the additional activities that were carried out.	
48	Duty to publicise the proposed application in the manner prescribed in regulation 4 of the Applications Regulations	<p>For both Stage 2 and 3 Consultation section 48 notices advertising the intention to apply for a DCO were placed in local newspapers, one national newspaper (The Times) and in the London Gazette. The section 48 notices included the deadline for which responses to the publicity were due by.</p> <p>For the Stage 2 Consultation, the section 48 notice was published in the Isle of Thanet Gazette.</p> <p>For the Stage 3 Consultation, a combined s.47 and s.48 notice was published in the East Kent Mercury, the Kentish Gazette and the Isle of Thanet Gazette.</p> <p>Consultation adverts were also placed in The Canterbury Times series, the Herald Express Series and the Thanet Gazette.</p> <p>Further details can be found in Chapters 9 and 12 of this report.</p> <p>The s48 notices were prepared in accordance with regulation 4 of the Applications Regulations. Copies of the notices are provided at Appendices 29 and 47.</p>	<p>Stage 2: 2 and 9 June 2017 in the local newspaper and 2 June 2017 in The Times and the London Gazette.</p> <p>Stage 3: 3,4,5, and 10,11,12 January 2018 in local newspapers and on 4 January 2018 in The Times and the London Gazette</p>
49	Duty to have regard to any relevant responses to consultation and publicity	<p>This Consultation Report details how RiverOak has had regard to all relevant consultation responses received in accordance with section 42, 47 and 48.</p> <p>Chapter 6 details how RiverOak has taken account of responses received during the non-statutory</p>	Not applicable

		consultation stage and Chapters 7, 8, 10 and 11 detail how RiverOak has taken account of relevant responses received during the two stages of Statutory Consultation.	
50(3)	Duty to have regard to any guidance under this section.	Please see Table 5.2 below which sets out in detail how RiverOak has taken into account the published guidance on the pre-application process prepared by the Department for Communities and Local Government (now the Ministry of Housing, Communities and Local Government).	Not applicable
EIA Regulations 2009 (under which Stage 2 Consultation was carried out)			
6	Duty to either request the Secretary of State to adopt a screening opinion or notify the Secretary of State that the applicant proposes to provide an Environmental Statement (ES) in respect of the development. A request or notification must be accompanied by the items specified in subsection (3).	On 30 June 2016 the Secretary of State received the scoping report requesting a scoping opinion for the Proposed Development. A scoping opinion was provided by the Secretary of State on 10 August 2016.	
10	Duty for the consultation statement prepared under section 47 of the PA 2008 to state: (a) whether the development for which the applicant proposes to make an application for an order granting development consent is EIA development; and	The Stage 2 section 47 notices as published stated: <i>“The proposed project is an Environmental Impact Assessment development (“EIA development”), as defined by the Infrastructure Planning (Environmental Impact Assessment) Regulations 2009. This means that the proposed works constitute development for which Environmental Impact Assessment will be required. An Environment Statement will therefore be submitted as part of the proposed application</i>	Section 47 notice published on 26 May 2017. Copy provided at Appendix 22

	(b) if that development is EIA development, how the applicant intends to publicise and consult on the preliminary environmental information	<p><i>containing information about the environmental effects of the Proposed Development. Preliminary environment information can be found in the Preliminary Environmental Information Report ("PEIR") which forms part of the consultation material."</i></p> <p>The following text was also included in the Stage 2 SoCC:</p> <p><i>"In line with Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2009 as amended, the Project team will need to carry out an environmental impact assessment. We will therefore be including preliminary environmental information as part of the consultation documents."</i></p>	
11	Notice of Preliminary Environmental Information	Regulation 11 letters were issued to Regulation 9 bodies alongside a copy of the section 48 Notice for the Stage 2 Consultation. See Appendix 4 .	<p>Stage 2: 9 June 2017 (Consultation commenced on 12 June 2017)</p> <p>Stage 3: 12 January 2018 (Consultation commenced on 12 January 2018)</p>
EIA Regulations 2017 (under which Stage 3 Consultation was carried out)			
8	Duty to either request the Secretary of State to adopt a screening opinion or notify the Secretary	By submitting a request for a scoping opinion on 30 June 2016 the Secretary of State was deemed to	

	of State that the applicant proposes to provide an Environmental Statement (ES) in respect of the development.	have been notified under Regulation 6(1)(b) of the proposal to provide an ES in respect of the Proposed Development.	
12	<p>Duty for the consultation statement prepared under section 47 of the PA 2008 to state:</p> <p>(a) whether the development for which the applicant proposes to make an application for an order granting development consent is EIA development; and</p> <p>(b) if that development is EIA development, how the applicant intends to publicise and consult on the preliminary environmental information</p>	<p>The Stage 3 section 47 notices as published stated:</p> <p><i>“The proposed project is an Environmental Impact Assessment development (“EIA development”), as defined by the 2017 Regulations. This means that the proposed works constitute development for which Environmental Impact Assessment will be required. An Environmental Statement will therefore be submitted as part of the proposed application containing information about the environmental effects of the Proposed Development. Preliminary environmental information can be found in the updated Preliminary Environmental Information Report (“PEIR”) which forms part of the consultation material“</i></p>	<p>Section 47 notice published on 3, 4, 5, 10, 11 and 12 January 2018 (combined with section 48 notice)</p> <p>Copy provided at Appendix 47.</p>
13	Notice of Preliminary Environmental Information	Regulation 13 letters were issued to Regulation 11 bodies alongside a copy of the section 48 Notice. See Appendix 32.	<p>Stage 3:</p> <p>12 January 2018 (Consultation commenced on 12 January 2018)</p>

Table 5.2: Compliance with DCLG Guidance ‘Planning Act 2008: Guidance on Pre-application Process’ (2015)

Guidance	Comment
<p>From Paragraph 21</p> <p><i>Where an applicant has not been able to follow this guidance, they should provide comments setting out why this is the case, in the consultation report.</i></p>	<p>RiverOak has complied with DCLG Guidance on the pre-application process as set out in the remainder of this Table 5.2.</p>
<p>From Paragraph 24</p> <p><i>The aim should be to ensure that consultation is appropriate to the scale and nature of the project and where its impacts will be experienced.</i></p>	<p>The following Local Authorities and Parish Councils were consulted on the approach to the Stage 2 and Stage 3 Consultation through a consultation on the SoCCs for both consultation stages of the statutory consultation: KCC, TDC, DDC, CCC, Acol Parish Council, Birchington Parish Council, Broadstairs and St Peters Town Council, Cliffsend Parish Council, Manston Parish Council, Mayor and Charter Trustees of Margate, Minster-in-Thamet Parish Council, Monkton Parish Council, Ramsgate Town Council, Sandwich Town Council, St Nicholas-at-Wade with Sarre Parish Council and Westgate-on-Sea Town Council. Further information is provided in Chapters 8 and 11.</p> <p>For the non-statutory 2016 consultation, the consultation was advertised with the local community and covered on social and local media. Consultation events were held in July 2016 in: Broadstairs, Margate, Herne Bay, Canterbury, Sandwich and Ramsgate.</p> <p>For the Stage 2 Statutory Consultation in 2017 the Consultation Zone of properties who received individual notification was set at 2km around the boundary of the airport, and the zone within which newspaper notices and library deposits were made was the whole of east Kent. The 2km Consultation Zone was set because it was regarded as a reasonable distance from the airport to receive individual notification (and was increased from 1km following feedback on the draft SoCC).</p> <p>For the Stage 3 Statutory Consultation, taking into consideration feedback from Stage 2 and feedback on the draft Stage 3 SoCC,, RiverOak increased the Zone to include all properties within 3km of the airport boundary, plus the whole of Ramsgate and Herne Bay, and other</p>

	<p>properties under sections of the proposed flight path swathes. The southern boundary of the Zone followed Parish Council boundaries. The zone included over 50,000 properties. The zone was set to ensure that all consultees likely to be affected by aircraft noise from the Proposed Development were aware of the consultation, particularly in relation to the draft Noise Mitigation Plan developed in response to the Stage 2 Consultation.</p> <p>Diagrams of the consultation zones for the statutory consultations can be found at Appendices 56 and 48.</p> <p>RiverOak considers the three stages of consultation, utilising a range of engagement activities whereby those residents and businesses closer to the airport were contacted directly, to be proportionate to the scale of the Proposed Development.</p>
<p>Paragraph 25</p> <p><i>Consultation should be thorough, effective and proportionate.</i></p> <p><i>For example, larger, more complex applications are likely to need to go beyond the statutory minimum timescales laid down in the Planning Act to provide enough time for consultees to understand Proposed Development proposals and formulate a response. Many proposals will require detailed technical input, especially regarding impacts, so sufficient time will need to be allowed for this. Consultation should also be sufficiently flexible to respond to the needs and requirements of consultees, for example where a consultee has indicated that they would prefer to be consulted via email only, this should be accommodated as far as possible.</i></p>	<p>RiverOak has taken a comprehensive approach to consultation and has carried out a number of stages going beyond the statutory requirements. To meet pre-application duties, RiverOak carried out one stage of non-statutory consultation in 2016 and two stages of statutory consultation in 2017 and 2018 respectively, providing the opportunity for consultees to influence the development of the Proposed Development from an early stage. RiverOak are also continuing to engage with stakeholders as the application is developed and will continue to do so throughout the DCO process.</p> <p>Throughout the pre-application consultation, feedback deadlines for submitting responses were set for each stage. Stage 1 had an eight-week deadline, Stage 2 a six-week deadline and Stage 3 a five-week deadline. The relevant Chapters of this report provide information on consultation periods for each stage and also the consideration of any late responses (Stage 1 - Non-Statutory Consultation 2016 – Chapter 6) (Stage 2 - Statutory Consultation 2017 – Chapters 7-9) (Stage 3 - Statutory Consultation 2018 – Chapters 10-12).</p> <p>Feedback from all stages of consultation was welcomed in a range of formats to accommodate the needs of respondents, this included, letters, email, on-line responses and hand written feedback forms.</p>

<p>Paragraph 28</p> <p><i>From time to time a body may cease to exist but, for legislative timetabling reasons, may still be listed as a statutory consultee. In such situations the Secretary of State will not expect strict compliance with the statutory requirements. Applicants should identify any successor body and consult with them in the same manner as they would have with the original body. Where there is no obvious successor, applicants should seek the advice of the Inspectorate, who may be able to identify an appropriate alternative consultee. Whether or not an alternative is identified, the consultation report should briefly note any cases where compliance with statutory requirements was impossible and the reasons why.</i></p>	<p>RiverOak has consulted all Prescribed Consultees during the two stages of Statutory Consultation as listed in Regulation 9: Prescribed Consultee list. Appendices 15 and 42 to this report provides a list of such bodies consulted. No bodies were identified as having ceased to exist and therefore it was not necessary to identify any successor bodies to consult with.</p>
<p>From Paragraph 29</p> <p><i>Early engagement with expert bodies can help avoid unnecessary delays and the costs of having to make changes at later stages of the process. It is equally important that statutory Consultees respond to a request for technical input in a timely manner. Applicants are therefore advised to discuss and agree a timetable with consultees for the provision of such inputs.</i></p>	<p>Details of consultation activities can be located within the technical Chapters of the ES (document reference TR020002/APP/5.2-1 – 5.2-3). Chapters 6 - 17 individually outline the consultation that has been undertaken to date with expert bodies. A formal charging agreement has been entered into with Historic England and planning performance agreements will be entered into with Local Authorities who have requested one.</p>
<p>From Paragraph 36</p> <p><i>Where an applicant decides to consult people living in a wider area who could be affected by the project (e.g. through visual or environmental impacts, or through increased traffic flow), that intention should be reflected in the SoCC.</i></p>	<p>Due to the specific nature of the Proposed Development and potential for effects on the wider area of Thanet and East Kent, RiverOak considered that there was a need to consult with people over a wider area outside of the host Local Authority boundaries.</p> <p>The SoCC included a statement that “This statutory consultation is open to everyone.” The published SoCCs (provided at Appendices 12 and 40 to this report) for Stages 2 and 3 consultation set out who RiverOak consulted over and above the statutory consultees.</p>
<p>From Paragraph 37</p> <p><i>The Planning Act requires Local Authorities to respond to the applicant’s consultation on their proposed Statement of Community Consultation within 28 days of receipt of the request. However, prior to submitting their draft SoCC applicants may wish to seek to resolve any disagreements or clarifications about the public consultation</i></p>	<p>Local Authorities were consulted on the contents of both the Stage 2 and Stage 3 Consultation SoCCs and their comments were considered prior to its publication.</p>

<p><i>design. An applicant is therefore likely to need to engage in discussions with Local Authorities over a longer period than the minimum requirements set out in the Act.</i></p>	<p>The steps involved in developing the SoCC for the Proposed Development are discussed in more detail within Chapters 8 and 11 of this report.</p> <p>Appendices 18 and 45 contain copies of the emails sent to the Local Authorities and Parish Councils seeking comment on the Draft SoCCs, and copies of the letters and emails sent by the Local Authorities and Parish Councils in response to the consultation on the Draft SoCC can be found at Appendices 19 and 46.</p>
<p>Paragraph 42</p> <p><i>Where a Local Authority decides that it does not wish to respond to a consultation request on the SoCC, The applicant should make reasonable efforts to ensure that all affected communities are consulted.</i></p>	<p>Sixteen Local Authorities and Parish Councils were contacted in respect of the Stage 2 Draft SoCC, four of those provided feedback</p> <p>The same sixteen Local Authorities and Parish Councils were consulted on the Stage 3 Draft SoCC. At this stage three of those consulted provided feedback.</p> <p>For both Stage 2 and 3 consultation, RiverOak designed its consultation approach to ensure all affected communities were consulted including hard to reach groups.</p> <p>Representatives of the identified community groups and organisations were contacted directly with details about the Statutory Consultations. Consultees were also able to contact the RiverOak team directly by phone or email,</p> <p>To ensure that hard to reach groups were encouraged to get involved in the consultations the materials prepared were accessible and clear. In the Stage 2 Statutory Consultation SoCC, it was explained that the Consultation Leaflet, Feedback Form and Overview Report could also be made available in alternative forms on request. In the Stage 3 Statutory Consultation SoCC, a similar approach was taken where it was also explained that the Introduction to Consultation and feedback form could be made available in alternative forms on request.</p> <p>Chapters 8 and 11 of this report provide more information on the formation of the SoCCs and RiverOak’s approach to both stages of Statutory Consultation.</p>
<p>Paragraph 43</p>	<p>RiverOak carried out Non-Statutory consultation with Local Authorities which enabled early engagement with the Local Authorities on the</p>

<p><i>Local authorities are also themselves statutory consultees for any proposed major infrastructure project which is in or adjacent to their area. Applicants should engage with them as early as possible to ensure that the impacts of the development on the local area are understood and considered prior to the application being submitted to the Secretary of State.</i></p>	<p>potential effects of the Proposed Development on the local and wider areas.</p>
<p>Paragraph 49</p> <p><i>Applicants will also need to identify and consult people who own, occupy or have another interest in the land in question, or who could be affected by a project in such a way that they may be able to make a claim for compensation.</i></p>	<p>Diligent inquiry was undertaken to produce a Book of Reference to identify PILs to be consulted at each stage. All identified PILs were consulted at the commencement of each Stage of Statutory Consultation.</p> <p>Further information on how PILs were identified at each Stage of statutory consultation is provided in Chapters 7 and 10. The Book of Reference is provided as document TR020002/APP/3.3 of the DCO submission.</p>
<p>Paragraph 54</p> <p><i>Applicants should use a range of methods and techniques to ensure that they access all sections of the community in question.</i></p>	<p>A range of methods were utilised at each stage of consultation to ensure all members of the community were aware of both the statutory and non-statutory consultations. This included, but was not limited to, adverts in local and regional press, social media campaigns and announcements on Facebook and Twitter, sending emails to those who had previously expressed an interest in the Proposed Development, sending letters and emails to elected representatives in the area, sending letters and emails to local community groups, site notices, the creation of a Proposed Development specific website, helpline number and freepost address and holding local consultation events.</p> <p>Consultation materials were displayed in eleven local libraries for the duration of both statutory consultations and were checked on a weekly basis to ensure the materials were complete. Due to its size, full copies of the 2017 and 2018 PEIRs were only available at Deal, Margate and Ramsgate libraries. Following feedback received from local residents, an additional copy of the PEIR was placed in Herne Bay library part way through Stage 3. USB sticks with all consultation material pre-loaded were also made available at exhibition events, eleven local libraries and on request.</p> <p>The methods used for each stage of consultation are described in Chapters 7-12 of this Report. For the statutory consultation stages, the</p>

	<p>methods were also described in the relevant SoCCs which are appended to this report at Appendices 12 and 40).</p>
<p>Paragraph 55</p> <p><i>Applicants must set out clearly what is being consulted on. They must be careful to make it clear to local communities what is settled and why, and what remains to be decided, so that expectations of local communities are properly managed.</i></p>	<p>At the start of each consultation stage (non- statutory and both statutory), the SoCC, adverts placed in local and regional press, and documents prepared for consultation, advised on the documents that were provided as part of each round of consultation and set out what was being consulted on.</p> <p>At each stage of the consultation, it was made clear in the consultation documents what was and wasn't being consulted on. For Stage 2, the Overview Report set out what was being consulted on and each of the seven questions in the feedback form set out clearly what was being asked of consultees. For Stage 3, the Introduction to Consultation document set out what was being consulted on and each of the five questions in the feedback form set out clearly what was being asked of consultees.</p>
<p>Paragraph 55</p> <p><i>Applicants could prepare a short document specifically for local communities, summarising the project proposals and outlining the matters on which the view of the local community is sought. This can describe core elements of the project and explain what the potential benefits and impacts may be. Such documents should be written in clear, accessible, and non-technical language. Applicants should consider making it available in formats appropriate to the needs of people with disabilities if requested.</i></p>	<p>For Stage 2 Consultation an Overview Report was made available and for Stage 3 Consultation an Introduction to Consultation was produced. Both documents outlined the Proposed Development and summarised the technical documents that had been made available at the relevant consultation stage in clear, accessible and non-technical language.</p> <p>These document were available in hard copy at all exhibition venues, on USB sticks to take away from all libraries and exhibition venues, online via the Proposed Development website, and could be requested in hard copy via the website or free phone number. The Stage 2 Overview Report is included at Appendix 7 to this report. The Stage 3 Introduction to Consultation is available at Appendix 35.</p> <p>For both Stages 2 and 3 consultation, RiverOak also prepared a non-technical summary of the PEIRs which described the information RiverOak had already collected about the potential environmental effects of the Proposed Development. Both non-technical summaries were written in clear, accessible, non –technical language These can be found at Appendices 7 (within the Consultation Overview Report) and 39.</p>
<p>Paragraph 56</p>	<p>The SoCCs produced for both Stage 2 and Stage 3 Consultation (provided at Appendices 12 and 40) set out the various groups</p>

<p><i>Set out in the SoCC how they propose to consult those living in the vicinity of the land. They are encouraged to consider consulting beyond where this might provide more information on the impacts of their proposals (e.g. through visual impacts or increased traffic flow).</i></p>	<p>RiverOak consulted. This included those living in the vicinity of the land and further afield as well as other bodies and organisations listed in Appendix 1 of both SoCCs. RiverOak advertised each stage of the Statutory Consultation widely to ensure that anyone likely to be affected by the proposals (in particular by aircraft noise) was able to take part.</p> <p>Further details of who RiverOak consulted at each consultation stage is provided in Chapters 8 and 11.</p>
<p>Paragraph 57</p> <p><i>The SoCC should act as a framework for the community consultation generally, for example, setting out where details and dates of any events will be published. The SoCC should be made available online, at any exhibitions or other events held by the applicants. It should also be placed at appropriate local deposit points (e.g. libraries, council offices) and sent to local community groups as appropriate.</i></p>	<p>The SoCCs produced for both Stage 2 and 3 consultation (provided at Appendices 12 and 40) set out the details of consultation events and exhibitions, the locations where copies of the consultation documents were available to view and details of where further information and updates could be found.</p> <p>The SoCCs were available online on the Proposed Development website prior to and during each statutory consultation phase and were also available for inspection at various locations and consultation events in the local area in hard copy format. Further details can be found in Chapters 8 and 11.</p>
<p>Paragraph 68</p> <p><i>To realise the benefits of consultation on a project, it must take place at a sufficiently early stage to allow consultees a real opportunity to influence the proposals. At the same time, consultees will need sufficient information on a project to be able to recognise and understand the impacts.</i></p>	<p>RiverOak undertook three stages of consultation, one of which was non-statutory and the two were statutory consultation, at various stages in the development of the Proposed Development. These three stages, provided consultees with the opportunity to influence the design from an early stage and throughout development of the Proposed Development.</p> <p>At each stage it was made clear what aspects of the Proposed Development RiverOak was consulting on and the impact this feedback would have on proposals moving forward. Information about the Proposed Development was made available in the suites of consultation documents including two PEIRs to allow the consultees to understand the potential impacts of the Proposed Development.</p>
<p>From Paragraph 69</p> <p><i>Applicants will require detailed technical advice from consultees and it is likely that their input will be of the greatest value if they are consulted when project proposals are fluid, followed up by confirmation of the approach as proposals become firmer. In</i></p>	<p>RiverOak carried out three stages of consultation to gain feedback from consultees at various stages in the development of the Proposed Development. This included a preliminary non-statutory consultation in 2016 to ensure consultees had the opportunity to respond to the proposals from an early stage.</p>

<p><i>principle, therefore, applicants should undertake initial consultation as soon as there is sufficient detail to allow consultees to understand the nature of the project properly</i></p>	<p>Consultation and technical feedback was sought from consultees throughout all consultation stages. Feedback from each stage of consultation has shaped the Proposed Development. Further details about how RiverOak has taken consultation responses into account can be found in Chapters 7, 8, 10 and 11.</p>
<p>From Paragraph 70</p> <p><i>To manage the tension between consulting early, but also having project proposals that are firm enough to enable consultees to comment, applicants are encouraged to consider an iterative, phased consultation consisting of two (or more) stages, especially for large projects with long development periods.</i></p>	<p>RiverOak carried out three stages of pre-application consultation: non-statutory consultation in the Summer of 2016; statutory consultation in the Summer of 2017 and a second stage of statutory consultation at the beginning of 2018.</p> <p>RiverOak believes this approach gave consultees a chance to respond to the proposals both at an early stage and as further details became available.</p>
<p>Paragraph 71</p> <p><i>Where an iterative consultation is intended, it may be advisable for applicants to carry out the final stage of consultation with persons who have an interest in the land once they have worked up their project proposals in sufficient detail to identify affected land interests.</i></p>	<p>Section 44 parties were consulted as part of both stages of the statutory consultation. For further information see response to Paragraph 49 above.</p>
<p>Paragraph 72</p> <p><i>Applicants should set consultation deadlines that are realistic and proportionate to the proposed project. It is important that consultees do not withhold information that might affect a project, and that they respond in good time to applicants. Where responses are not received by the deadline, the applicant is not obliged to take those responses into account.</i></p>	<p>For each consultation stage a consultation deadline was set allowing sufficient time for feedback to be given on the information being consulted on. The time allowed was as follows:</p> <ul style="list-style-type: none"> • Stage 1: Non-statutory consultation - Summer 2016 – 68 days • Stage 2: Statutory consultation - Summer 2017– 42 days • Stage 3: Statutory consultation – Winter 2018 – 35 days <p>Each stage was well above the 28 day statutory minimum to ensure consultees were given sufficient time to respond. At both stages of Statutory Consultation, some responses were received outside of the deadline. However, all late responses received in relation to Stage 2, and those received within two weeks of the relevant deadline for Stage 3 were treated in the same way as those received within the deadline to ensure all feedback was taken into account. Responses received later than 2 weeks after the deadline for Stage 3 were too close to the</p>

	finalisation of the application for them to be taken into account. Further details can be found in Chapters 8 and 11 .
<p>From Paragraph 73</p> <p><i>Applicants are not expected to repeat consultation rounds set out in their SoCC unless the project proposals have changed very substantially.</i></p>	It was not necessary to repeat any consultation stages. However, RiverOak did undertake two separate stages of statutory consultation to allow consultees to respond to updated proposals and to ensure compliance with the latest EIA Regulations.
<p>Paragraph 74</p> <p><i>Where a proposed application changes to such a large degree that the proposals could be considered a new application, the legitimacy of the consultation already carried out could be questioned. In such cases, applicants should undertake further re-consultation on the new proposals, and supply consultees with sufficient information to enable them to fully understand the nature of the change and any likely significant impacts (but not necessarily the full suite of consultation documents), and allow at least 28 days for consultees to respond.</i></p>	No such large change took place. The masterplan was updated after each consultation stage but the changes were evolutionary, and the Proposed Development has not changed to such an extent as to constitute a new application.
<p>Paragraph 75</p> <p><i>If the application only changes to a small degree, or if the change only affects part of the development, then it is not necessary for an applicant to undertake a full re-consultation. Where a proposed application is amended in light of consultation responses then, unless those amendments materially change the application or materially changes its impacts, the amendments themselves should not trigger a need for further consultation. Instead, ensure that all affected statutory consultees and local communities are informed of the changes.</i></p>	<p>It was not necessary to repeat any consultation stages.</p> <p>However, RiverOak did undertake two separate stages of statutory consultation to allow consultees to respond to updated proposals and to ensure compliance with the latest EIA Regulations.</p>
<p>Paragraph 77</p> <p><i>Consultation should be fair and reasonable for applicants as well as communities. To ensure that consultation is fair to all parties, applicants should be able to demonstrate that the consultation process is proportionate to the impacts of the project in the area that</i></p>	Prior to the non-statutory and statutory consultation period, a consultation zone was set whereby residents and businesses were contacted directly, to ensure that the consultation process was proportionate to the impacts of the Proposed Development in the area it affected. All those who were registered on the RiverOak website also received notice of the consultation by email.

<p><i>it affects, takes account of the anticipated level of local interest, and takes account of the views of the relevant Local Authorities.</i></p>	<p>For Stage 2 Consultation, it was initially proposed to send letters to those within a zone of 1km around the airport, but following feedback on the draft SoCC this was increased to 2km (plus the whole of any streets that straddled the 2km boundary).</p> <p>For Stage 3, taking into consideration feedback from Stage 2 and feedback on the draft Stage 3 SoCC, RiverOak increased the zone to include all properties within any of: 3km of the airport boundary, plus the whole of Ramsgate and Herne Bay, and other properties under sections of the proposed flight path swathes. The southern boundary of the zone followed Parish Council boundaries. The zone included over 50,000 properties, all of which were sent a postcard advertising the consultation.</p> <p>RiverOak also consulted using a variety of methods, including local, regional and national press, a Proposed Development specific website, social media - Facebook and Twitter, phone number, email and exhibitions in the Thanet and East Kent area. This variety of methods was proportionate and was able to accommodate anticipated levels of interest in the Proposed Development.</p> <p>RiverOak engaged with Local Authorities on each of the consultation methods undertaken as described within Chapters 8 and 11 of this report and the SoCC.</p>
<p>Paragraph 80</p> <p><i>Therefore, the consultation report should:</i></p> <ul style="list-style-type: none"> • <i>Provide a general description of the consultation process undertaken, which can helpfully include a timeline;</i> • <i>set out specifically what the applicant has done in compliance with the requirements of the Planning Act, relevant secondary legislation, this guidance, and any relevant policies, guidance or advice published by Government or the Inspectorate;</i> • <i>set out how the applicant has taken account of any response to consultation with Local Authorities on what should be in the applicant's SoCC;</i> • <i>set out a summary of relevant responses to consultation (but not a complete list of responses);</i> • <i>provide a description of how the application was informed and influenced by those responses, outlining any changes made as</i> 	<p>Addressing each of the bullet points in turn:</p> <ul style="list-style-type: none"> • Chapter 5 provides a consultation overview <ul style="list-style-type: none"> • Tables 5.1 and 5.2 demonstrate RiverOak's compliance with the Act, Statutory Instruments, Planning Inspectorate Advice Notes and DCLG guidance; • Chapters 8 and 11, Tables 8.1 and 11.1 demonstrate RiverOak's consideration of Local Authority feedback on the SoCC prior to its publication; • Tables 7.3 and 10.3 summarise relevant responses received under the statutory consultation and regard had to these. • Chapters 7, 8, 10 and 11 describe how RiverOak had regard to responses received and any changes made to Proposed Development as a result; and;

<p><i>a result and showing how significant relevant responses will be addressed;</i></p> <ul style="list-style-type: none"> • <i>provide an explanation as to why responses advising on major changes to a project were not followed, including advice from statutory consultee on impacts;</i> • <i>where the applicant has not followed the advice of the Local Authority or not complied with this guidance or any relevant Advice Note published by the Inspectorate, provide an explanation for the action taken; and</i> • <i>be expressed in terms sufficient to enable the Secretary of State to understand fully how the consultation process has been undertaken and significant effects addressed. However, it need not include full technical explanations of these matters.</i> 	<ul style="list-style-type: none"> • All relevant advice notes and guidance has been followed in producing this document to enable the Secretary of State to fully understand the consultation processes undertaken.
<p>Paragraph 81</p> <p><i>It is good practice that those who have contributed to the consultation are informed of the results of the consultation exercise; how the information received by applicants has been used to shape and influence the project; and how any outstanding issues will be addressed before an application is submitted to the Inspectorate.</i></p>	<p>All those who were consulted during the non-statutory consultation in 2016 and who registered interest were kept updated on future Proposed Development announcements.</p> <p>Following the Non-statutory Consultation, an Interim Consultation Report was published in June 2017 as part of the suite of documents available for the Stage 2 statutory consultation.</p> <p>This Consultation Report demonstrates how regard has been had to the feedback received at all stages of consultation and explains changes made to the Proposed Development as a result. Where appropriate, RiverOak provided individual responses to matters raised.</p> <p>Statements of Common Ground are being drafted with core stakeholders to cover any outstanding and unresolved issues.</p>
<p>Paragraph 82</p> <p><i>As with the consultation itself, it is likely that different audiences will require different levels of information. The local community may be particularly interested in what the collective view of the community is and how this has been taken into account. Consultees with technical interests may seek more detailed information on what impacts and</i></p>	<p>Consultation material was produced to reflect the audiences with whom RiverOak was consulting. For example during the first stage of statutory consultation the Overview Report was produced as an easy access overview of the Proposed Development to-date for any consultee who did not have a technical knowledge or technical interest in the Proposed Development. Similarly for the Stage 2 statutory consultation an Introduction to Consultation document was produced for the same reasons.</p>

<p><i>risks have been identified, and how they are proposed to be mitigated or managed.</i></p>	<p>For consultees requiring more technical information the PEIRs provided at both stages of statutory consultation gave a snapshot of the environmental survey and assessment work that had taken place to date.</p> <p>For ease of review, within this Report, feedback from the community at each consultation stage has been grouped into ‘themes’ and reported on that basis (see Tables 8.9-8.15 and 11.8-11.12).</p>
<p>Paragraph 83</p> <p><i>Applicants should consider producing a summary note in plain English for the local community setting out headline findings and how they have been addressed, together with a link to the full consultation report for those interested. This could be supplemented by events in the local area.</i></p>	<p>An executive summary is located at the beginning of this Report. A summary account of responses received, and how these have been considered throughout the development of the Proposed Development, is also provided at the ends of the Chapters relating to each stage of consultation.</p>
<p>Paragraph 84</p> <p><i>The applicant should make a judgement as to whether the consultation report provides sufficient detail on the relevant impacts, or whether a targeted response be more appropriate. Applicants are also likely to have identified a number of key additional bodies for consultation and may need to continue engagement with these bodies on an individual basis.</i></p>	<p>Chapters 7, 8, 10 and 11 set out the feedback received from consultees during the three stages of consultation and how RiverOak took the feedback into account.</p> <p>To better understand the views of the local community, community responses have been grouped into themes. However, individual responses are provided for feedback received from statutory consultees.</p> <p>Outside of the designated consultation stages, on-going engagement with statutory consultees is continuing via correspondence, telephone and face to face meetings. Such meetings are inclusive of, but not limited to Historic England, DDC, Public Health England and Natural England.</p>
<p>Paragraph 91</p> <p><i>The applicable EIA regulations prescribe as follows:</i></p> <p><i>Regulation 10 – the SoCC must state whether the project falls within the scope of the Directive, and if it does, how will the PEI be publicised and consulted on; and</i></p>	<p>The Stage 2 consultation was carried out in accordance with the 2009 EIA Regulations and Stage 3 was carried out in accordance with the 2017 EIA Regulations.</p> <p>The Stage 2 SoCC as published advises that: ‘<i>In line with Regulation 10 of the Infrastructure (Environmental Impact Assessment) Regulations 2009 as amended, the Proposed Development team will need to carry out an environmental impact assessment. We will therefore be including</i></p>

<p><i>Regulation 11 - publicity of project proposals under section 48 of the Planning Act must encompass the requirements of the Environmental Impact Assessment process and at the time of publishing the proposed application, applicants must notify all environmental consultation bodies.</i></p>	<p><i>preliminary environmental information as part of the consultation documents'</i></p> <p>The Stage 3 SoCC is in the same terms but refers to the relevant 2017 Regulation, which is Regulation 12.</p> <p>The Preliminary Environmental Information in the form of a Preliminary Environmental Information Report (PEIR) was available during the Stage 2 and Stage 3 Consultations for comment at deposit locations, public exhibitions, on the Proposed Development website and on request.</p> <p>The section 48 notices as published for the Stage 2 and Stage 3 Consultations, complied with the requirements of the relevant EIA Regulations.</p> <p>Regulation 11 (of the 2009 Regulations) letters were issued to all Regulation 9 parties with a copy of the section 48 notice for the Stage 2 Consultation, and regulation 13 (of the 2017 Regulations) letters were issued to all Regulation 11 parties with a copy of the section 48 notice for the Stage 3 Consultation.</p> <p>RiverOak has consulted all the relevant environmental consultation bodies.</p>
<p>Paragraph 93</p> <p><i>Applicants are advised to include sufficient PEI to enable consultees to develop an informed view of the project. The information required may be different for different types and sizes of projects. It may also vary depending on the audience of a particular consultation. The preliminary environmental information is not expected to replicate or be a draft of the environmental statement. However, if the applicant considers this to be appropriate (and more cost-effective), it can be presented in this way. The key issue is that the PEI presented must provide clarity to all consultees. Do not assume that non-specialist consultees would not be interested in any technical environmental information. Access to the PEI should be provided during all consultations.</i></p>	<p>The PEIRs provided at both stages of statutory consultation provided detailed information on the environmental assessments undertaken at the time the reports were produced to enable consultees to develop an informed view of the Proposed Development.</p> <p>To make the information accessible to non-specialist consultees, non-technical summaries of the PEIRs were provided in the form of, the Overview Report produced for Stage 2 and the non-technical summary of the 2018 PEIR provided at Stage 3.</p> <p>Both PEIRs were available to view in full at deposit locations, public exhibitions, on the Proposed Development website and on request as part of both stages of Statutory Consultation. Further details on the availability of the PEIR can be found in Chapters 8 and 11.</p>
<p>Paragraph 96</p>	<p>Throughout the development of the Proposed Development RiverOak has engaged with Natural England (NE) regarding Habitats Regulations</p>

It is the applicant's responsibility to consult with the relevant statutory bodies and, if they consider it necessary, with any relevant non-statutory nature conservation bodies, in order to gather evidence for the HRA. This consultation should take place as early as possible in the pre-application process. One way of doing this is for an applicant to agree an evidence plan.

Assessment (HRA) Process. Consultation has been undertaken with the main contact being their Lead Advisor, Sustainable Development Team Sussex and Kent. Consultations have also included NE's Air Quality specialist and Ornithologist. The 2017 Preliminary Environmental Information Report was also sent to RSPB and the Kent Wildlife Trust (KWT). Attempts were made to engage with KWT with regard to potential off-site (mitigation) compensation, although no response was received.

Table 5.3: Compliance with PINS' Advice Note Fourteen 'Compiling the Consultation Report'

Guidance	Notes
<p>The Consultation Report should draw together:</p> <ul style="list-style-type: none"> - An account of the statutory consultation, publicity, deadlines set, and community consultation activities undertaken by the application at the pre-application stage under sections 42, 47 and 48; - A summary of the relevant responses to the separate strands of consultation; and - The account taken of responses in developing the application from proposed to final form, as required by section 49 (2). 	<p>Chapters 7-12 of this Consultation Report provide an account of both statutory consultations under sections 42, 47 and 48 of the PA 2008.</p> <p>Chapters 7, 8, 10 and 11 provide a summary of the relevant responses to consultation and account taken of responses received</p>
<p>Capture and reflect upon all of the responses received from the three different strands of consultation and publicity set out in section 37.</p>	<p>Chapters 7, 8, 10 and 11 provide summaries of all the responses received during the two stages of statutory consultation and details of how RiverOak has taken them into account.</p>
<p>Explain how the developer has met its duty under section 49 in the preparation of the application to have regard to the views expressed.</p>	<p>After each stage of consultation RiverOak reviewed all consultation responses received and, where appropriate, RiverOak has amended the Proposed Development to take the responses into account.</p> <p>Tables 7.2-7.4, 8.9-8.15, 10.2-10.4 and 11.8-11.12 list the feedback received during each stage of consultation and the regard had to responses and any Proposed Development changes made.</p>
<p>Capture non-statutory or 'informal' consultation that takes place outside the requirements of the 2008 Act.</p>	<p>Chapter 6 details the non-statutory Stage 1 consultation that took place on the Proposed Development outside of the requirements of the PA 2008.</p> <p>Chapter 13 sets out other ongoing engagement which RiverOak has carried out, outside of the three consultation stages.</p>

<p>Explain where DCLG guidance has not been followed in terms of the pre-application consultation</p>	<p>Please see Table 5.2 above for detail on compliance with DCLG guidance.</p>
<p>Provision of a quick reference guide, summarising all the consultation activity in chronological order.</p>	<p>Chapter 5 and Table 1.1 provide a quick reference guide summarising all consultation activity (non-statutory and statutory) in chronological order that has taken place on the Proposed Development.</p>
<p>Explanatory text should set the scene and provide an overview and narrative of the whole pre-application stage as it relates to the particular project.</p>	<p>Chapter 5 provides an overview of all the pre-application consultation stages on the Proposed Development.</p>
<p>Set out the wider historical context where national infrastructure projects have evolved over an extended period of time, perhaps with previous incarnations not coming to fruition for one reason or another. Give a brief description of any historic consultation activity including any information available about the scale and nature of the response at that time.</p>	<p>Chapter 4 of this report advises on the evolution of the Proposed Development from its inception to application submission and gives the historical background of the site.</p>
<p>A full list of prescribed consultees should be provided as part of the Consultation Report.</p> <p>Explain where the prescribed consultees have been consulted on multiple occasions.</p> <p>Justify any instance where the applicant's list of prescribed consultees varies from the list of organisations set out in Schedule 1 of the APFP Regs 2009.</p> <p>The list of organisations set out in schedule 1 of the APFP should be followed in terms of the order in which the consultees are presented.</p>	<p>Complete lists of prescribed consultees for the two stages of statutory consultation are provided at Appendices 15 and 42.</p> <p>The prescribed consultee's were consulted on multiple occasions as part of Stage 2 and Stage 3 Consultation,</p> <p>The list of prescribed consultees for both stages of statutory consultation did not vary from the list of organisations set out in Schedule 1 of the APFP Regulations 2009.</p> <p>In addition to the list of organisations set out in Schedule 1 of the APFP Regulations 2009, RiverOak also consulted other, non-prescribed organisations and bodies during the statutory consultation as a matter of best practice. Appendices 16 and 43 to this report provides a list of these non-prescribed consultees.</p>

	Chapters 7 and 10 of this report summarise responses received from prescribed consultees and the regard had to these responses.
Description of how Section 43 of the PA 2008 has been applied in order to identify the relevant Local Authorities, supported by a map.	A description of how Section 43 of the PA 2008 has been applied in order to identify the relevant Local Authorities contacted during statutory consultation is provided at Chapter 7 of this report.
Section 44 parties to be identified as a distinct element of the wider section 42 consultation.	Appendices 15 and 42 provides a list of PILs consulted under section 42 consultation. Tables 7.4 and 10.4 in Chapters 7 and 10 detail the number of Section 44 responses received and regard had to these responses
Highlight in the consolidated list of prescribed consultees the consultees who are also included in the book of reference for compulsory acquisition purposes.	All PILs included in the Book of Reference who are also prescribed consultees are included and listed in Appendices 15 and 42 . Since concluding the Stage 2 consultation, RiverOak continued to review and improve the design of the Proposed Development. Following further design iterations, RiverOak made some minor amendments to the order limits. Any additional persons with an interest in land (PIL) that were identified were consulted as a PIL under the Stage 3 Section 42 consultation. Any new PILs that come to RiverOak's attention since finalising the book of reference will be served with a Section 56 notice following acceptance of the application. RiverOak will give due consideration to any representations they may make before and during the course of the examination.
Provide a summary of the rationale behind the SoCC methodology.	Chapters 8 and 11 of this Report provide summaries of the rationale behind the SoCCs produced for both stages of the Statutory Consultation.
Evidence demonstrating which Local Authorities were consulted on draft SoCC content, what Local Authority comments were,	Chapters 8 and 11 of this report provides details of which Local Authorities and Parish Councils were consulted on the draft SoCCs for both stages of

<p>confirmation of timescales provided for feedback, and description of how applicant had regard to Local Authority comment.</p>	<p>statutory consultation and confirms the timescales provided for feedback and how RiverOak had regard to Local Authority and Parish Council comment.</p> <p>Copies of the emails sent to the Local Authorities and Parish Councils requesting feedback can be found at Appendices 18 and 45.</p>
<p>Copies of the published SoCC as it appeared in the local press should be provided along with confirmation of which local newspapers it was published in and when.</p>	<p>Copies of the SoCCs published for both stages of statutory consultation can be found at Appendices 12 and 40.</p> <p>Confirmation of which local newspapers the SoCCs were published in and when is provided in Chapters 8 and 11.</p>
<p>Where more than one SoCC was prepared for a project, for example where a SoCC was subject to one or more updates, the updated SoCC(s) should be included together with a narrative about why the SoCC was reviewed and updated.</p>	<p>RiverOak prepared draft SoCCs for both stages of statutory consultation. At both stages of statutory consultation, Local Authorities and Parish Councils were consulted on the relevant draft SoCC and RiverOak took the comments received into account when preparing a final SoCC for each stage.</p> <p>Summaries of the feedback on the draft SoCCs and any resulting changes made to the final SoCCs can be found in Chapters 8 and 11.</p> <p>The draft and final SoCCs for Stage 2 Consultation can be found at Appendices 17 and 12 and the draft and final SoCCs for Stage 3 Consultation can be found at Appendices 44 and 40.</p>
<p>Explain/justify where there were any inconsistencies with the SoCC, for example where additional activities took place that were not included in the SoCC.</p>	<p>RiverOak carried out both stages of statutory consultation in accordance with the relevant SoCC. Appendices 23 and 49 set out how RiverOak adhered to the SoCCs in more detail.</p> <p>The only inconsistency with the published SoCCs occurred during Stage 2 Consultation. During this stage RiverOak carried out a number of additional events at the request of local community groups. Details of these events and an explanation for them is provided in Chapter 8.</p>

<p>Set out the relevant Local Authorities' views about any changes made to the consultation methodology that were not dealt with by way of a review of the SoCC.</p>	<p>The draft SoCCs for both stages of statutory consultation were consulted on formally, under the PA 2008, by RiverOak prior to the preparation and publication.</p> <p>Details of the responses received from Local Authorities and Parish Councils and how RiverOak had regard to them are included in Chapters 8 and 11.</p>
<p>A copy of the section 48 notice as it appeared in the local and national newspapers, together with a description of where the notice was published and confirmation of the time period given for responses.</p>	<p>Appendices 29 and 47 provide copies of the Section 48 notices as published for Stage 2 and 3 consultation.</p> <p>Chapters 9 and 12 provide detail on local and national newspapers in which the notices were published at each stage and confirmation of the time period given for responses.</p>
<p>Confirm the section 48 notice was sent to the prescribed consultees at the same time as the notice was published.</p>	<p>Prescribed consultees identified within Schedule 1 of the Application Regulations were sent the Section 48 notice for Stage 2 Consultation on 9 June 2017 and for Stage 3 on 12 January 2018.</p> <p>For Stage 2 Consultation prescribed consultees were also sent a covering letter, a feedback form, and a copy of the Overview Report, together with a USB stick containing all consultation materials. For Stage 3 Consultation, they were sent a covering letter, a feedback form and a copy of the Introduction to Consultation document, together with a USB-stick containing all consultation materials.</p>
<p>Provide a description of the consultation material used and how the prescribed consultees were able to access it.</p>	<p>A description of the statutory consultation material and access methods for Stages 2 and 3 consultation can be found at Chapters 7 and 10 respectively.</p>
<p>Indicate and identify separately in the report any consultation undertaken outside of the requirements of the Act</p>	<p>RiverOak undertook a non-statutory consultation in 2016. This stage of consultation was undertaken outside of the requirements of the PA 2008. Further details of this non-statutory stage of consultation are provided in Chapter 6.</p>

	RiverOak also carried out wider, ongoing engagement with a number of stakeholders outside of the requirements of the PA2008. This is described in more detail in Chapter 13 .
Include a description of the consultation undertaken as part of the EIA regime as a separate part of the report.	Chapter 14 describes the consultation undertaken as part of the EIA regime under the PA 2008.
If appropriate, group responses under headline issues. Where this approach has been adopted identify and explain this approach, including any safeguards and cross checking.	Tables 6.1, 8.9-8.15 and 11.8-11.12 detail the feedback received during non-statutory and statutory consultation and engagement. This feedback was grouped under headline themes such as ‘Night flights’ and ‘Noise’. A detailed explanation of how the responses were grouped and the safeguards and cross-checking used to ensure all responses were taken into account can be found in Chapters 7, 8, 10 and 11 .
A list of the individual responses received should be provided and categorised in an appropriate way.	Tables 7.2-7.4, 8.9-8.15, 10.2-10.4 and 11.9-11.13 detail the responses received during both stages of statutory consultation; categorised as Section 42 (prescribed consultees, non-prescribed consultees, Local Authorities and persons with an interest in land (PILS)) and Section 47 (local community). Due to the number of responses received (over 3400) only those from section 42 consultees are identified in this report; the others are summarised by issue. All consultation responses can be provided upon request.
Advise that applicants group responses under three strands of consultation: - section 42 prescribed consultees (including sections 43 and 44) - section 47 community consultees - section 48 responses to statutory publicity. Make a further distinction within those categories by sorting responses according to whether they contain comments which have led to changes to matters such as siting, route, design, form or scale	Responses have been grouped into the three strands specified and are included in separate Chapters in this Report. Chapters 7 and 8 set out the responses for Stage 2 Consultation and Chapters 10 and 11 set out the responses for Stage 3 Consultation. Responses have been tabled with a column advising by way of a ‘yes’ or a ‘no’ whether a change has been made to the Proposed Development as a result of feedback, followed by a more detailed explanation of RiverOak’s response. An

<p>of the scheme itself, or to mitigation or compensatory measures proposed, or have led to no change.</p>	<p>'n/a' title has also been provided where the response does not relate to a change to the Proposed Development.</p>
<p>Include a summary of responses by appropriate category and explain the reason why responses have led to no change, including where responses have been received after deadlines set by the applicant.</p>	<p>Within the response tables, the column titled 'Regard had to response during consultation/Changes made' advises why a change has or has not been made.</p> <p>All responses received after the consultation deadlines for both stages of statutory consultation have been reviewed and taken into account in the same way as those received within the deadline.</p>
<p>Where a resolution has not been reached in areas of disagreement a summary should be provided.</p>	<p>This Report describes and addresses any matters of disagreement raised during statutory and non-statutory consultation.</p>
<p>Ensure that the addresses and other contact information of private individuals are treated appropriately within the context of this statutory process e.g. ensure it has been fully redacted.</p>	<p>All responses have been fully redacted to ensure confidentiality of addresses and contact details.</p>

Table 5.4: Compliance with DCLG Guidance ‘Planning Act 2008: Application Form Guidance’ (2013)

Guidance	Comment
<p>From Paragraph 3 <i>Section 37(3) of the Planning Act requires the application to ... be accompanied by the consultation report.</i></p>	<p>The application is accompanied by this Consultation Report (document reference TR020002/APP/6.1) and its appendices (document reference TR020002/APP/6.2).</p>
<p>From Paragraph 20 <i>Part 5 of the Planning Act requires the applicant to produce a consultation report, and for this report to accompany the application. The report must include a summary of the relevant responses received by the applicant. Applicants are also encouraged to provide other supporting evidence, such as written statements or correspondence, where matters relevant to their application have been agreed with other organisations.</i></p>	<p>The application is accompanied by this Consultation Report (document reference TR020002/APP/6.1) and its appendices (document reference TR020002/APP/6.2).</p> <p>This Report includes a summary of the responses received by the applicant and is set out in the following chapters:</p> <ul style="list-style-type: none"> - Chapter 6: responses to Stage 1 Non-Statutory Consultation - Chapter 7: responses to s.42 Stage 2 Statutory Consultation - Chapter 8: responses to s.47 Stage 2 Statutory Consultation - Chapter 9: responses to s.48 Stage 2 Statutory Consultation - Chapter 10: responses to s.42 Stage 3 Statutory Consultation - Chapter 11: responses to s.47 Stage 2 Statutory Consultation - Chapter 12: responses to s.48 Stage 2 Statutory Consultation

6 STAGE 1: NON-STATUTORY CONSULTATION

Introduction

- 6.1 This Chapter describes the non-statutory consultation ROIC undertook prior to RiverOak undertaking the statutory consultations prescribed by the PA 2008.
- 6.2 This period of non-statutory consultation ran from 12 July to 5 September 2016. During this time ROIC made consultation documentation available on its website and publicised the consultation through a mixture of newspaper advertising in local newspapers, including the Canterbury Times Series, Dover Express, Ashford Herald, Folkestone Herald and the Isle of Thanet Gazette and via social media campaigns and announcements on Facebook and Twitter. The Stage 1 Media Report can be found in **Appendix 1**.

Approach to non-statutory consultation

- 6.3 The purpose of the non-statutory consultation was to consult with stakeholders at a formative stage in the development of the Proposed Development. ROIC's strategy was to consult with a wide range of local communities and stakeholders from across the local area in order to seek their views on the early draft plans for airport.
- 6.4 Using a combination of direct mail, media advertising and social media communications, ROIC invited local stakeholders to take part in the consultation and have their say on the proposals.
- 6.5 Six public consultation events were held during a two-week period at locations across East Kent in order to reach a wide range of local residents, businesses and stakeholders.
- 6.6 ROIC and then RiverOak considered all feedback from the first stage of consultation and used it to develop its proposals and its approach to Stage 2 Consultation.

Non-statutory consultation activities undertaken

- 6.7 During the non-statutory consultation, ROIC held a series of informal consultation events to enable the local community in Thanet and East Kent to find out more about the Proposed Development and the DCO process. Consultation events were held on the following dates and at the following locations:
- 6.7.1 Tuesday 12 July 2016: Broadstairs: Broadstairs Pavilion, Harbour Street, CT10 1EU
- 6.7.2 Wednesday 13 July 2016: Margate: The Sands Hotel, 16 Marine Drive, CT9 1DH
- 6.7.3 Monday 18 July 2016: Herne Bay: The King's Hall, Beacon Hill, CT6 6BA
- 6.7.4 Thursday 21 July 2016: Canterbury: Canterbury Cathedral Lodge, The Precincts, CT1 2EH
- 6.7.5 Friday 22 July 2016: Sandwich: The Guildhall, Sandwich, CT13 9AP
- 6.7.6 Saturday 23 July 2016: Ramsgate: Comfort Inn, Victoria Parade, CT11 8DT

6.8 These events were held as informal drop-in sessions from 10.00 till 20.00 from Monday to Saturday, to allow members of the local community to call in at a time convenient for them. There were no formal presentations but members of the team were available to answer questions and copies of a pre-consultation information document about the proposals were available to take away.

Responses received

6.9 Consultees were encouraged to respond by submitting a Feedback Form by handing one in at the informal drop-in sessions referred to above, submitting one by post or email to manstonconsultation@bdb-law.co.uk or by completing the form online.

6.10 In total, 822 responses were received at the non-statutory consultation. 741 (90%) were in support of the proposals, 66 (8%) were opposed and 15 (2%) had not yet decided. These can be further detailed as follows:

6.10.1 A total of 332 hard copy responses were received at consultation events. Of these:

- (a) 313 (94%) were from individuals in support of the proposals;
- (b) 15 (5%) were from individuals opposed to the proposals; and
- (c) 4 (1%) were from individuals who had not yet decided.

6.10.2 A total of 268 responses were received by email. Of these:

- (a) 214 (80%) were from individuals in support of the proposals;
- (b) 45 (17%) were from individuals opposed to the proposals; and
- (c) 9 (3%) were from individuals who had not yet decided.

6.10.3 A total of 222 hard copy responses were received by post. Of these:

- (a) 214 (96%) were from individuals in support of the proposals;
- (b) 6 (3%) were from individuals opposed to the proposals; and
- (c) 2 (1%) were from individuals who had not yet decided.

ROIC and RiverOak's regard to responses received

6.11 Eight key concerns/suggestions were raised during the consultation: night flights; noise; air pollution; flight path; passenger services; requirement for local employment; flying school; viewing area.

6.12 A summary of the concerns and improvements raised in the responses and an explanation of how ROIC and RiverOak took account of these responses is provided in **Table 6.1** below.

Table 6.1: Responses received at Stage 1 consultation and how RiverOak had regard to the responses

Summary of Issue	Change? Y / N	How RiverOak had regard to the responses
<p>Night flights - This was raised by a total of 72 (9%) respondents and related to the concern of respondents that there would be an uncontrolled number of night flights over their homes.</p>	Y	<p>RiverOak’s proposals will not involve an uncontrolled number of night flights. Year 20 of RiverOak’s projection is considered to be the ‘worst-case’ year in terms of noise with an average of seven night-time flights forecast during that year, and Measures have been proposed in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4) to minimise the noise impacts of aircraft in the light of further environmental impact assessment and responses received to Stage 2 and 3 statutory consultation.</p>
<p>Noise - This was raised by a total of 69 (8%) respondents and related to the concern of respondents that there will be an increase in noise pollution.</p>	Y	<p>Chapter 12 of the ES (document reference TR020002/APP/5.2-2) includes an assessment of the potential noise effects as a result of the Proposed Development. This includes measures to mitigate any potentially significant effects as a result of both the construction and operation of the Proposed Development.</p>
<p>Air pollution - This was raised by a total of 18 (2%) respondents and related to the concern of respondents that there will be an increase in air pollution.</p>	Y	<p>Chapter 6 of the ES (document reference TR020002/APP/5.2-1) includes an assessment of the potential air quality effects as a result of the Proposed Development. This includes measures to mitigate any potentially significant effects as a result of both the construction and operation of the Proposed Development. Air quality monitoring will be provided.</p>
<p>Flight path - This was raised by a total of 15 (2%) respondents and related to the concern of certain residents about the flight path of</p>	Y	<p>RiverOak’s business plan envisages generally attracting operators with modern high performance, quiet aircraft. On take-off, these aircraft gain height more quickly and</p>

<p>incoming and outgoing planes flying low over their homes.</p>		<p>can turn earlier than the types of aircraft previously operating at Manston; this will allow better avoidance of flying over populated areas.</p>
<p>Passenger services - This was raised by a total of 77 (9%) respondents. All of these respondents stated that they would like to see passenger services return to Manston Airport.</p>	<p>N</p>	<p>The intention is to provide facilities to allow development of predominantly low cost leisure flights to resort destinations in Europe. The target market will be mid and East Kent. Low cost operators have been consulted and have expressed interest in operating in this market. However, the main purpose of the airport is for cargo flights.</p>
<p>Requirement for local employment - This was raised by a total of 17 (2%) respondents. All of those respondents who mentioned the need for local employment stated that they would like to see Manston Airport recruit the local population to its workforce.</p>	<p>N</p>	<p>The Azimuth Report (document reference TR020002/APP/7.4) shows the forecasts for employment that Manston Airport is likely to generate. These jobs are predicted to be direct (including those created by the airport operator, airlines, general aviation, handling, immigration and customs, retail and food concessions and aircraft maintenance), indirect (including a wide range of jobs in the airport's supply chain), induced (which includes jobs created by the spending of people employed directly and indirectly), and catalytic (which includes jobs in the wider economy supported by the operations of an airport such as in tourism and trade). Job creation to Year 20 of operation is forecast to total more than 23,000 across all categories.</p> <p>RiverOak is engaging with higher and further education providers in East Kent to ensure local people will have the opportunity to gain the skills required to meet the needs of the onsite employers including the airport operator, airlines, and aircraft maintenance.</p>
<p>Flying school - This was raised by a total of 15 (2%) respondents. All of those respondents who mentioned a flying school did so in the context of suggesting that there should be one at Manston Airport, particularly in relation to younger people.</p>	<p>N</p>	<p>RiverOak cannot guarantee the inclusion of a flying school at the site, because its priority is the provision of a successful cargo airport, but will consider such ancillary uses once the airport is established.</p>

<p>Viewing area - This was raised by a total of 13 (2%) respondents. This suggestion related to the desire for there to be a viewing area within the terminal building so that passengers and non-passengers alike could watch planes taking off and coming into land.</p>		<p>RiverOak has incorporated viewing areas for passengers and non-passengers into its masterplan where possible.</p>
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Conclusion from non-statutory Consultation

- 6.13 The non-statutory consultation recorded significant support for the reopening of the airport and encouraged RiverOak to continue with its proposals. A selection of issues were raised by a relatively small number of respondents – most preferring to record their support or opposition in principle only. Of the issues raised, the most common was that of night flights, which are proposed to be controlled through the Noise Mitigation Plan (**document reference TR020002/APP/2.4**) that is part of the application.

Summary of influence on the Proposed Development

- 6.14 The non-statutory consultation influenced the project by confirming that there was significant support for the reopening of the airport, that night flights, noise and air quality were environmental issues of greatest concern, and that facilities at the airport and employment were benefits to consider improving, all of which fed into the development of the project and the mitigation of its impacts.

7 STAGE 2: STATUTORY CONSULTATION: CONSULTATION WITH STATUTORY CONSULTEES (SECTION 42)

Introduction

7.1 This Chapter describes the first statutory consultation RiverOak undertook as prescribed by the PA 2008. This period of statutory consultation ran from 12 June to 23 July 2017.

Approach to statutory consultation

7.2 As set out in paragraph 5.4, RiverOak's approach to this stage of statutory consultation was to use a wide range of communications methods to consult residents, businesses, prescribed and non-prescribed consultees at a meaningful stage in the development of the Proposed Development. A combination of direct mail (letters and emails), media advertising, social media activity and engagement with Local Authorities was used to ensure a wide cross-section of stakeholders had the opportunity to contribute during the consultation.

7.3 RiverOak aimed to make information regarding the proposals widely available in local libraries, as well as online. Local communities, businesses and other stakeholders were invited to take part in the consultation, ensuring the views from a diverse range of stakeholders.

7.4 Full details for the activities undertaken during statutory consultation are set out below.

Statutory consultation activities undertaken

7.5 On 9 June 2017, in accordance with section 46 of the PA 2008, RiverOak wrote to PINS to provide formal notice of its intention to submit the DCO application. Due to an error with the postal service, the copy of the letter sent on 9 June was returned to sender despite the letter being correctly addressed and sent. However, a further copy of the letter was hand-delivered to PINS on 15 June 2017.

7.6 The letter advised PINS that RiverOak intended to commence statutory pre-application consultation on 12 June 2017. A copy of the letter sent to PINS is provided in **Appendix 2**, and a copy of the letter dated 7 July 2017 received from PINS confirming receipt is provided in **Appendix 3**.

7.7 Section 42 consultation was carried out between 12 June and 23 July 2017. Publicity under Section 48 and community consultation under Section 47 in respect of the Proposed Development also took place during this time (as described in more detail in **Chapters 8 and 9**).

7.8 Each Section 42 consultee was sent a Section 42 consultation pack which comprised the following materials:

7.8.1 short covering letter (see **Appendix 4**);

7.8.2 copy of the Section 48 Notice (see **Appendix 5**) (thereby complying with Regulation 11 of the EIA Regulations 2009);

7.8.3 Feedback Form (see **Appendix 6**);

- 7.8.4 Overview Report (see **Appendix 7**);
- 7.8.5 USB containing all consultation materials including copies of the following:
- (a) Consultation Leaflet (see **Appendix 8**);
 - (b) Feedback Form (**Appendix 6**);
 - (c) Overview Report (**Appendix 7**);
 - (d) 2017 PEIR Volumes 1-9 (due to the size of the 2017 PEIR a copy has not been appended to this report but it is available on the RiverOak website at www.rsp.co.uk);
 - (e) Draft Masterplan for Manston Airport (see **Appendix 9**);
 - (f) Manston Airport - a Regional and National Asset, Volumes I-IV; an analysis of air freight capacity limitations and constraints in the South East and Manston's ability to address these and provide for future growth (see **Appendix 10**);
 - (g) Outline Business Case (see **Appendix 11**);
 - (h) SoCC (see **Appendix 12**);
 - (i) Location Plan (see **Appendix 13**); and
 - (j) Interim Consultation Report, setting out the details of the first stage of consultation and how feedback received has been used to help develop the proposals (see **Appendix 14**).
- 7.9 The consultation packs were sent out on 9 June 2017 and the deadline set by RiverOak for a formal response was 23 July 2017 giving a 42-day consultation period, well in excess of the 28 days required.
- 7.10 Consultees were encouraged to respond by:
- 7.10.1 completing a hard copy of the Feedback Form and returning it by post or by leaving it at one of the consultation events;
 - 7.10.2 completing the Feedback Form online at www.rsp.co.uk; or
 - 7.10.3 emailing a response to manston@communityrelations.co.uk.
- 7.11 In total, 75 responses were received from individuals and organisations under s42, and 2225 responses were received altogether under sections 42, 47 and 48.

Section 42 Consultees

- 7.12 Section 42 of the PA 2008 and Regulation 3 of and Schedule 1 to the Application Regulations set out who RiverOak must consult regarding its proposed application. This includes a

prescribed list of bodies, host and neighbouring Local Authorities, and persons with an interest in land affected by the application (PILs).

Prescribed consultees

- 7.13 RiverOak identified prescribed consultees through consideration of the list in Schedule 1 of the Application Regulations. The list of identified consultees was then compared to the list of prescribed consultees provided by PINS in issuing the Scoping Opinion, to ensure that there were no omissions. A full list of the prescribed consultees to which Section 42 consultation packs were sent can be found at **Appendix 15**.

Local Authorities

- 7.14 Section 43 prescribes which Local Authorities RiverOak must include as Section 42 consultees.

- 7.15 The Proposed Development is proposed within the boundaries of:

7.15.1 TDC; and

7.15.2 KCC.

- 7.16 Each of these 'host' authorities were identified as consultees under Section 42(1)(b). In addition, the following neighbouring authorities were identified as Section 42(1)(b) consultees:

7.16.1 DDC;

7.16.2 Canterbury City Council;

7.16.3 East Sussex County Council;

7.16.4 London Borough of Bromley

7.16.5 London Borough of Bexley

7.16.6 Medway Council

7.16.7 Surrey County Council; and

7.16.8 Thurrock Council

- 7.17 For ease of reference, a map showing the Proposed Development and identifying the boundaries of the relevant Local Authorities (the Location Plan) is provided at **Appendix 13**.

- 7.18 RiverOak also included a number of Parish Councils beyond the host parishes of Manston and Minster-in-Thamet in its consultation and these have been detailed and reported on in this Chapter. The following Parish Councils were consulted:

7.18.1 Acol Parish Council;

7.18.2 Birchington Parish Council;

7.18.3 Broadstairs and St Peters Town Council;

- 7.18.4 Cliffsend Parish Council;
- 7.18.5 Manston Parish Council;
- 7.18.6 Margate Charter Trustees;
- 7.18.7 Minster-in-Thamet Parish Council;
- 7.18.8 Monkton Parish Council;
- 7.18.9 Ramsgate Town Council;
- 7.18.10 Sandwich Town Council;
- 7.18.11 St Nicholas at Wade with Sarre Parish Council; and
- 7.18.12 Westgate-on-Sea Town Council.

Persons with an interest in land (PILs)

- 7.19 Section 44 sets out various categories of persons with an interest in land who should be consulted as Section 42 consultees. In order to establish the identity of PILs, RiverOak instructed WSP to conduct the land referencing exercise.
- 7.20 WSP were provided with the order limits as then established, plus a noise contour, to establish Category 1 and 2 landowners. Surveying consultants CBRE advised that the landowners outside the order limits that may have a claim in compensation under Part I or section 10 (i.e. Category 3) would be those within either the 63dB daytime contour or the 55db night-time contour (whichever was larger), being the level at which the government recommends noise insulation. These contours were established by environmental consultants Wood and provided to WSP.
- 7.21 Details of how the identity of the PILs was established and the land referencing carried out can be found in the WSP Land Referencing Diligent Inquiry Methodology provided at **Appendix 20**.
- 7.22 The Book of Reference (**document reference TR020002/APP/3.3**) sets out which landowners fall into which of the categories in Section 44. In order to comply with data protection principles, RiverOak has not identified individual respondents in this Report, although in accordance with PINS Advice Note 14, the list of Section 42 consultees at **Appendix 15** does identify which of the prescribed consultees are also identified in the Book of Reference.
- 7.23 All 806 identified PILS were sent a copy of the Section 42 consultation pack and covering letter, as set out more fully in paragraph 7.8 above.

Other consultation activities

- 7.24 In addition to sending consultation packs, meetings were held with some prescribed consultees such as Natural England and the Environment Agency. Details of these are set out in the relevant Chapters of the Environmental Statement.

Responses

7.25 The table below outlines the volume of responses received within the consultation timeframe and also includes late responses as listed in paragraph 7.25:

Table 7.1: Volume of Section 42 Consultation responses

Stakeholder Type	Number of consultees to whom s.42 consultation materials were sent	Number of responses received
Prescribed consultees, excluding Local Authorities, Parish Councils and PILs	83	11
Local Authorities	10	6
Parish Councils	12	3
PILs	806	55
Total	911	75

7.26 An additional four responses were received after the consultation deadline: Cadent Gas on 24 July, Public Health England on 14 August, HSE on 13 September and the London Borough of Bexley on 26 February 2018. These have been taken into consideration in the same way as responses received before the consultation deadline and are included in **Table 7.1** above and **Table 7.2** below.

Relevant Responses

7.27 A summary of the responses received from the prescribed consultees and how RiverOak has taken account of them are summarised in **Tables 7.2-7.4** below.

Table 7.2: Prescribed Consultees responses and how RiverOak had regard to the responses

Consultee	Summary of Response	Change? Y / N	Regard had to response
Cadent Gas	Cadent Gas confirmed that they do not operate in the area and have no affected infrastructure.	N	RiverOak has noted this and thanks Cadent Gas for responding to the consultation.
Environment Agency (EA)	Ask RiverOak to produce a full Construction Environmental Management Plan (CEMP) and agree it with the EA	Y	A CEMP, Appendix 3.2 of the ES (document reference TR020002/APP/5.2-6) is included as part of RiverOak’s application submission and the EA is able to comment on it when making representations on the application.
	Seek the removal of any decommissioned existing drains to minimise contamination	Y	In consultation with the EA the requirement to remove redundant drains in order to eliminate pollution pathways to underlying aquifer has been recognised. The exact nature of any work will be identified and agreed with the EA once detailed site information has been obtained. The EA is to be consulted on the surface and foul water drainage strategy via requirement 14 of the DCO (document reference TR020002/APP/2.1).
	Clarify whether s3.2.88 of 2017 PEIR meant deposit rather than disposal?, and whether the Applicant will seek to reuse materials or get a landfill permit	Y	RiverOak confirm that disposal was the incorrect terminology. The text in the ES has been updated to use the correct term ‘deposit’. It is expected that all materials will be used on site, but should this not be the case the appropriate waste licencing procedures will be followed. Further details are included within the CEMP, Appendix 3.2 of the ES (document reference TR020002/APP/5.2-6).

	Seek agreement that the spoil from the site will be reused and that the process will be managed with verification	Y	RiverOak agrees with this approach and has been in discussions with the EA in relation to this methodology.
	The EA has asked that it be involved in agreeing the piling designs.	Y	Appropriate permissions will be sought for all site works. RiverOak expects that this would include consultation with the EA in relation to any piling designs.
	The EA agrees to any concrete batching with conditions, including as far from Source Protection Zone 1 (SPZ1) as possible.	Y	All concrete batching plants will be located outside of the SPZ1. Proposed compound locations are shown on the phasing drawings submitted as part of the DCO application (document reference TR020002/APP/4.14).
	Ask RiverOak to carry out a further site investigation of the fuel tanks and above ground storage tanks, and produce a summary of the ground investigation.	Y	The need to carry out further investigation and risk based assessment is set out in the mitigation in Chapter 10: Land Quality, section 10.5 of the ES (document reference TR020002/APP/5.2-1) and in relation to the fuel tanks in Section 10.8 (para 10.8.3) of Chapter 10: Land Quality. Wood is in agreement with the EA that existing tanks on site could not be used as part of the proposed development.
	The EA has asked for an options appraisal to be carried out for the fuel depot and to agree the designs and containment processes.	Y	A Technical Note outlining the Fuel Farm requirements and a high-level appraisal of the options as part of the fuel farm site selection has been completed. This can be found at Appendix 2.1 to the ES (document reference TR020002/APP/5.2-6). In addition, a number of meetings have been held with the EA, the details of which are reported in the relevant Chapters of the ES: Chapter 8 Freshwater Environment and Chapter 10 Land Quality (document reference TR020002/APP/5.2-1).

	The EA has asked RiverOak to confirm that it will adopt the five surface water measures mentioned in the 2017 PEIR.	Y	RiverOak confirms that these measures will be adopted.
	Suggest training is put in place on the use of spill kits and penstock valves.	Y	Staff will be trained on the use of spill kits and penstock valves. The Hydrogeological Impact Assessment (Appendix 8.1 of the ES (document reference TR020002/APP/5.2-7)) recommends that penstock valves should be considered and that relevant personnel are trained in the use of the emergency system, in addition to the use of spill kits.
	Ask that penstock valves are used in the design for surface drainage	Y	RiverOak is proposing to install penstock valves (or a suitable alternative system) at the discharge point between the site drainage and the existing Pegwell Bay outfall pipeline so that discharge from the site can be prevented if required.
	Request that a review be carried out on the use of pesticides on the grassed areas of the site	Y	Table 10.10 of Chapter 10: Land Quality of the ES notes that the airport will develop a Habitat Management Plan which will be in the Operational Environmental Management Plan (document reference TR020002/APP/5.2-1) to control and manage the use of chemicals to prevent them being discharged to ground.
	Ask for the outfalls to surface water to be monitored during construction in case of pollution	Y	Monitoring will be carried out in line with the EA's proposal. The approach to monitoring is detailed in Chapter 8 of the ES (document reference TR020002/APP/5.2-1).
	Ask RiverOak to agree their operational pollution prevention plans and spillage management	Y	Details of the operational pollution prevention plans and spillage management are included within the relevant Chapters of the ES: Chapter 8 Freshwater Environment, Chapter 10 Land Quality, and Appendix 8.1 Hydrogeological Impact Assessment (document reference TR020002/APP/5.2-7).

	<p>Ask RiverOak to agree the management of drainage from vehicles</p>	<p>Y</p>	<p>The CEMP, Appendix 3.2 of the ES) (document reference TR020002/APP/5.2-6) sets out mitigation measures to be employed on site during the construction phase. Particular reference should be made to Section 5 of the CEMP.</p> <p>It is anticipated that the on-site drainage system will assist in collecting surface water, including that associated with vehicles. An outline Drainage Strategy has been appended to the Flood Risk Assessment in Appendix 8.2 of the ES (document reference TR020002/APP/5.2-8) which outlines the design of this system. The system will be designed to capture, treat and discharge water in a controlled manner. No water will be allowed to infiltrate to ground from any site hardstanding and water will either be re-used or sent to the site treatment facilities (attenuation ponds).</p>
	<p>Ask RiverOak to carry out an assessment of contamination when any buildings are demolished, (especially where the building is a fuel farm), including surface water management or cover systems</p>	<p>Y</p>	<p>The need to carry out further investigation and risk based assessment in relation to building demolition is set out in the section 10.5 in Chapter 10: Land Quality of the ES (document reference TR020002/APP/5.2-1) and in relation to the fuel tanks in sections 10.8 and 10.9 of Chapter 10: Land Quality (document reference TR020002/APP/5.2-1).</p> <p>A watching brief will be in place during demolition, ground and construction works. If unexpected contamination is encountered or suspected, the works will cease in that area and assessment by a suitably qualified land contamination specialist will be made to determine appropriate actions. Soil (soil vapour / groundwater) samples will be collected and analysed. When required, a remediation strategy will be designed and agreed following consultation with the EA and the relevant Local Authority as appropriate prior to implementation.</p>

	RiverOak's agreement is sought for the storage of firefighting materials on the site (some foams may not be allowed)	Y	RiverOak agree to the storage of firefighting materials on site and agree to consult the EA about these materials. The method of storage will be in accordance with EA and industry standard regulations.
	Asked to agree foul drainage provisions	Y	Details of the foul drainage provisions are included in the Drainage Strategy (appended to the Flood Risk Assessment in the ES – Appendix 8.2 – (document reference TR020002/APP/5.2-8)). Water and sewage demands will be discussed, and agreed following consultation, with Southern Water and the EA.
	Keep bulk of existing runways and taxiways	Y	RiverOak agree to maintain the existing runway. A new parallel taxiway will be installed to replace the existing non-EASA compliant taxiway (which is too close to the runway) and provide access to the new aircraft stands. The existing taxiway serving the current passenger terminal area will be maintained.
ESP Gas	ESP Gas Group Ltd confirmed that they do not have any gas or electricity apparatus in the vicinity of the site and therefore will not be affected by the proposed works	N	RiverOak has noted this and thanks ESP Gas for responding to the consultation.
Health and Safety Executive	No major hazard installations with Hazardous Substances Consent or major accident hazard pipelines in the vicinity of the Proposed Development.	N	This is understood and forms one of the assumptions of Chapter 17 of the ES: Major Accidents and Disasters (document reference TR020002/APP/5.2-3).
	Hazardous Substances Consent may be needed for proposed fuel farm and cargo facilities 1 -4. This may have an impact on the Proposed Development given the proximity of local	N	Based on current understanding of the anticipated chemicals and their quantities, a hazardous substance consent would not apply and Hazardous Substances Consent/Control Of Major Accident Hazards (COMAH) thresholds would not be reached in aggregate.

	residential housing to the fuel farm and cargo facilities		
	The presence of hazardous substances on, over or under land at or above threshold quantities may require hazardous substances consent	N	Based on current understanding of the anticipated chemicals and their quantities, a hazardous substance consent would not apply and COMAH thresholds would not be reached in aggregate.
	Hazardous Substances Consent would be required if the Site is intending to store or use any of the Named Hazardous Substances or Categories of Substances and Preparations at or above the controlled quantities set out in Schedule 1 of the Planning (Hazardous Substances) Regulations 2015	N	Based on current understanding of the anticipated chemicals and their quantities, a hazardous substance consent would not apply and COMAH thresholds would not be reached in aggregate.
	There is a licenced explosive site at Manston Airport	N	There are no plans for the airport to reinstate use as an explosive site. The potential for historical site issues relating to this previous site use will be managed by a process of investigation, monitoring and if required safe disposal prior and during construction/operation.
	The applicant should take account of and adhere to relevant health and safety requirements in respect of potential landfill.	N	RiverOak will adhere to all legal requirements, including health and safety requirements.
Highways England	RiverOak is asked to prepare a Transport Assessment that includes the effects on the A2/M2 and to work with Highways England on the scope	Y	River Oak has undertaken a Transport Assessment (document reference TR020002/APP/5.2-15). A meeting was held with Highways England to discuss the scope of the assessment where it was agreed the impacts on the Highways England network will be set out. This has been included in the Transport Assessment which appraises the Proposed Development's impacts on the Highways England network closest to the site, the A20,

			A2 and M2. The Transport Assessment also presents a percentage impact assessment of various development scenarios on the wider network, including the M20, M25.
	To provide Highways England (and KCC) with information on traffic generation, distribution and assignment	Y	The Transport Assessment, (document reference TR020002/APP/5.2-15) provides a detailed breakdown of the traffic generation methodology and distribution with calculations, tables and baseline data to inform this methodology for both local network (KCC) and the strategic network (Highways England).
Historic England	To adopt the approach in paragraphs 128-141 (conserving and enhancing the historic environment) of the National Planning Policy Framework	Y	<p>Relevant national and local policies are identified in section 9.2 of Chapter 9: Historic Environment of the ES (document reference TR020002/APP/5.2-1). Table 9.1 outlines how these policies have been addressed within the ES.</p> <p>This has been achieved as far as possible through the production of a desk-based assessment, Appendix 9.1 of the ES (document reference TR020002/5.2-8 and 5.2-9) and further assessment in Chapter 9 of the ES which has identified potential direct and indirect impacts of the development on heritage assets. Mitigation measures are outlined in sections 9.8 to 9.10 of Chapter 9 of the ES. These measures will inform the final design.</p>
	Historic England are not convinced that the excavations undertaken by Stone Hill Park will be available or relevant, and notes that they don't include the northern grass area. They ask that the applicant carry out a further geophysical survey and trial trenching	N	<p>Unsuccessful efforts have been made thus far to acquire the reports. It would not be best practice to carry out a second evaluation across the whole site, as this would risk damaging any heritage assets further and not contribute to further knowledge.</p> <p>A programme of works to include geophysical survey and evaluation is proposed and outlined in Chapter 5 of the ES (document reference TR020002/APP/5.2-1). In the absence of this information currently, the assessment presented in the ES provides a 'worst-case' scenario (see also Chapter 5: Approach to the ES, paragraphs 5.4.15-5.4.20).</p>

	<p>Ask RiverOak to consider the significance of all archaeological remains, and the setting of built heritage assets on the site- not just designated ones or equivalent.</p>	<p>N</p>	<p>The setting of non-designated built assets within the site and related non-designated assets out with the site is addressed in the desk-based assessment, Appendix 9.1 of the ES (document reference TR020002/APP/5.2-8 and 5.2-9).</p> <p>The assessment significance of all heritage assets is presented in Appendix 9.5 of the ES (document reference TR020002/APP/5.2-9). No additional non-designated assets were identified as being subject to impact during the course of the investigations. Further survey and investigations will be conducted as outlined in Chapter 5 of the ES (document reference TR020002/APP/5.2-1).</p>
	<p>Ask RiverOak to extend mitigation to include avoiding any heritage assets they discover during the works, rather than just recording them.</p>	<p>N</p>	<p>Further investigation is proposed in paragraphs 9.8.6 and 9.9.6 of the ES (document reference TR020002/APP/5.2-1), the scope of which will be discussed with KCC, TDC and Highways England.</p> <p>Contingency planning for avoidance of archaeological remains by design can only be discussed in principle at this stage and is reflected by the flexibility inherent in outline masterplanning. For this reason, the assessment presented in the ES provides a ‘worst-case’ scenario, whereby it is assumed that highly significant remains will be present and in the absence of avoidance this is assessed as a significant adverse effect.</p>
	<p>Archaeological investigation may be insufficient to address harm to heritage assets and some assets may merit avoidance of the impact, particularly nationally significant but non-designated archaeological assets which must be considered as if they were designated. RiverOak is asked to consider making a scheduling request under HE’s Enhanced Advisory Services should there be any doubt about the level of significance</p>	<p>N</p>	<p>Presently there is no evidence of features of schedulable significance on the site. However, a programme of mitigation measures, which include appropriate avoidance of highly significant heritage assets is provided in Section 9.8 of Chapter 9: Historic Environment of the ES (document reference TR020002/APP/5.2-1).</p> <p>Contingency planning for avoidance of archaeological remains by design can only be discussed in principle at this stage and is reflected by the flexibility inherent in outline masterplanning. For this reason, the</p>

	for archaeological remains that might be revealed by further evaluation		assessment presented in Chapter 10 of the ES (document reference TR020002/APP/5.2-1) provides a 'worst-case' scenario, whereby it is assumed that highly significant remains will be present and in the absence of avoidance this is assessed as a significant adverse effect. The option to utilise Enhanced Advisory Services is noted and will be considered as appropriate.
	Historic England noted that at present it is not considering any buildings or structures at the site for designation (Listing) but this cannot be ruled out as a possibility, particularly should a third party make a request for this. RiverOak is asked to consider screening for potential listing under HE's Enhanced Advisory Services.	N	Consultation and previous fieldwork have not identified any structures on the site that meet the criteria for listing. The option to utilise Enhanced Advisory Services is noted and will be considered as appropriate.
	High grade designated assets which are part of the same broad Wantsum Channel and Isle of Thanet landscape as the airport and consideration of views from these should form part of an appropriate assessment. Heritage England wish to agree which locations and assets should be considered and by what means.	Y	RiverOak has been in discussions with Historic England who has recommended including the following: Richborough Castle, the Abbey in Minster, designated assets around the site including Lord of the Manor, Ozengell Grange, Laundry Road and listed houses and farm buildings around the site. The setting of all of these, other designated assets within the study area and those identified as being of importance beyond the study area are addressed in Appendices 9.1 and 9.5 of the ES (document reference TR020002/APP/5.2-8 and 5.2-9) as well as in Table 9.5 of the ES (document reference TR020002/APP/5.2-1).
	Request that the museums are kept together when they are being moved	Y	An area of approximately 3ha has been safeguarded in the DCO application for operation of the RAF Manston History Museum, Spitfire & Hurricane Memorial Museum and memorial garden. This area encompasses the current museum and memorial grounds and allows for additional areas in which the museums could be expanded or

			relocated. A decision on whether to proceed with any relocation works will only be made after consultation with the museum operators to ensure that the museums' needs are reflected. A preliminary meeting was held between RiverOak and the museums on the 26 March 2018.
Defence Infrastructure Organisation (DIO)	The MoD raised concerns about the proximity of airport infrastructure to an MoD mast	Y	Osprey, on behalf of RiverOak, is in ongoing discussions with the MoD about their concerns. A meeting between RiverOak, Bircham Dyson Bell LLP, Osprey, RPS and the MoD was held on 14 March 2018. In this meeting the MoD agreed to provide the relevant technical detail and points of contact to allow the issue to be progressed. They also agreed to consider a draft Heads of Terms, prepared by BDB, for the agreement of placement of the MoD infrastructure.
National Grid	To inform RiverOak that the Richborough Connection will have no impact on aviation use	Y	RiverOak has noted this and thanks National Grid for responding to the consultation.
Natural England	Natural England would like to discuss ecological air quality receptors with the applicant	Y	Natural England have reviewed information provided in a Technical Not on the ecological receptors used for the air quality assessment, but have yet to provide a formal response. At a phone meeting on 6 March 2018, the rationale for the choice of receptors was further explained, and in particular it was explained that the receptors represent locations of greatest exposure to air quality impacts within each designated site, and have been assessed as though there are features of interest present at that location, which is a conservative approach The Technical Note is appended to Chapter 7: Biodiversity of the ES as Appendix 7.4 (document reference TR020002/APP/5.2-7) .
	Ask that RiverOak extend the assessment of dust receptors from 50m to 200m	N	There are no major ecological sites within 200m of dust sources. The only ecological sites within 200m are very low designation (priority habitat woodland) so it is not considered that going beyond accepted best practice of 50m (IAQM guidance) is justified. Further information

			on this topic can be located at Section 6.12 of Chapter 6: Air Quality of the ES (document reference TR020002/APP/5.2-1).
	State that further information is needed about how site discharges will be covered by the CEMP	Y	<p>Chapter 8 of the 2018 Preliminary Environmental Information Report (2018 PEIR) confirmed that any discharges will be covered by a permitting regime. Section 10.10.3 of the 2018 PEIR also stated the following: <i>“In construction phases 2-4 it is envisaged that the site drainage network would be in place and discharges would be to Pegwell Bay. Such discharges would only take place once silt and any other potential pollutants (e.g. hydrocarbons) had been removed from site discharge. Site specific measures required to address effective identification, protection, containment, attenuation, management and recovery of potential contaminants at the site during the construction and operational phases are being discussed with the regulators, including the EA, and TDC, and other stakeholders as appropriate.”</i></p> <p>These measures have been incorporated in the CEMP, Appendix 3.2 of the ES (document reference TR020002/APP/5.2-6) and will be included in the airport manual that will be produced for the operational phase in accordance with CAP 168.</p>
	Natural England seek clarification on what ‘this won’t be via a tariff’ means. They comment that there will need to be an actual site for off-site mitigation if this is required rather than just paying a sum.	Y	<p>This is reference to the ‘Developer’ paying a tariff that goes towards mitigation, where necessary, for any European (Natura 2000) sites. For example, when residential developments are close to a Special Protection Area (SPA) where increased visitor use resulting from the development might disturb qualifying interest birds, there is a tariff placed on each residential unit. This then goes towards paying for strategic access management measures to minimise/prevent the disturbance from increased visitor pressure on the designated site. In this case, the quotation indicates that any significant effects on European sites resulting from the Proposed Development would not have been mitigated in this way. Instead, mitigation for biodiversity will</p>

			be provided through land made available as off-site mitigation, secured through requirement 9 of the DCO (document reference TR020002/APP/2.1).
	Ask RiverOak to ensure that they use Natural England's Standing Advice on protected species	Y	Natural England's Standing Advice on protected species has been followed and this is explained and evidenced in Section 7.2 of Chapter 7: Biodiversity, of the ES (document reference TR020002/APP/5.2-1).
	Natural England query the timetable for protected species surveys which are planned for 2018, after consent	N	Ecological surveys are seasonal depending upon the type or group of organisms being surveyed, and therefore have to be completed during a certain period of the year. The site survey programme has been dependent upon obtaining site access from the landowners. This has been incomplete and resulted in no access being granted between March and late August 2017. As such it was not possible to undertake those surveys that were required over that period. Further information on how the lack of a complete environmental survey has been addressed can be found in Chapter 5 of the ES (document reference TR020002/APP/5.2-1).
	Cf PEIR 3.2.59 – seek confirmation whether EA consent is needed for discharge into Pegwell Bay	Y	An appropriate strategy to the regulation of the quality of the site discharge to Pegwell Bay will be discussed with the EA and Natural England as a part of the detailed site drainage design. Initial discussion with the EA indicates that the resumption of the use of the discharge pipe to Pegwell Bay may not require a new discharge consent as the majority of the discharge will be surface water runoff.
	PEIR 4.8 says only one Natura 2000 site is within 10km but Natural England say that this is incorrect	Y	RiverOak confirms that Natural England's findings are correct. Section 4.8 of the 2017 PEIR and 2018 PEIR were inconsistent with information contained in Chapter 7: Biodiversity, which contained the correct number of Natura 2000 sites. The correct number of Natura 2000 sites has been updated and is correctly included in Chapter 4

			and Chapter 7 of the ES (document reference TR020002/APP/5.2-1).
	State that reference should be made to the ornithological disturbance to Stodmarsh	Y	The effect of the Proposed Development on ornithological disturbance to Stodmarsh has been explored and is reported on in Appendix 7.1 of the ES (document reference TR020002/APP/5.2-6). It concludes that Proposed Development will result in no adverse effects on the integrity of the designated European sites.
	Natural England are concerned about the effects of any discharge into Pegwell Bay. They need to be satisfied that there will be no significant effect	Y	The effect of any discharge into Pegwell Bay has been assessed and is reported on in Appendix 7.1 of the ES (document reference TR020002/APP/5.2-6).
Network Rail	Ask about the effect the development will have on the level crossing at Foads Hill, Cliffs End (where A299 goes under)	Y	The impact on the rail crossing at Folds End was discussed with Network Rail at a meeting on the 14 September 2017. It was set out at this meeting that no construction traffic routes were proposed over the level crossing and due to the arrangement of the local road network there would not be a need for any staff/passenger vehicles to cross this level crossing unless they lived in the small settlement of Cliffsend. As such the impact will be negligible from road traffic. This position remains unchanged.
	Ask RiverOak to assess the impact the development may have on Minster and Ramsgate Stations in terms of usage. They state that this may need mitigation if any increase is significant	Y	It is proposed to run a shuttle service between Ramsgate Station and the Proposed Development, and this has been included within Appendix O of the Transport Assessment of the ES (document reference TR020002/APP/5.2-25) as part of the overall development impact on the road network and mitigation identification.

			<p>It is not proposed to route any shuttle bus services to and from Minster Station and therefore no further assessment has been carried out in relation to this station.</p> <p>There will be ongoing discussion with Network Rail with regards to rail passenger capacities at Ramsgate and Minster Stations post DCO submission with the anticipated agreements being included in a Statement of Common Ground.</p>
	To consider the relationship the Proposed Development would have with the proposed Thanet Parkway Station	Y	<p>Consideration for connectivity to Thanet Parkway is included in the Airport Surface Access Strategy appended to the Transport Assessment as Appendix O (document reference TR020002/APP/5.2-25), as requested by KCC during consultation. However, as set out in Appendix M (Public Rights of Way Management Plan) (document reference TR020002/APP/5.2-25) a sustainable pedestrian route to this proposed station could not be implemented.</p> <p>Given the uncertainty in delivery of the Parkway scheme as a purely aspirational site, the key focus of the public transport proposals for the Proposed Development is connectivity with Ramsgate Rail Station in the form of a regular and frequent shuttle bus service. Should Thanet Parkway come forward in the future, the Ramsgate shuttle bus service could be re-evaluated and discussed with KCC and Network Rail.</p>
Public Health England	Ask RiverOak to provide their rationale in the ES as to why the air quality assessment will use PSDH and ICAO.	Y	<p>PSDH (Project for the Sustainable Development of Heathrow) (and ICAO (the International Civil Aviation Organization) are the best practice methodologies for airport air quality assessments. The objective has been to provide the most rigorous assessment possible.</p> <p>The rationale is set out in detail in Chapter 6 of the ES (document reference TR020002/APP/5.2-1).</p>

	PHE will comment on scoping out e.g. SO ₂ later	Y	A detailed justification for excluding SO ₂ is included in Chapter 6 of the ES (document reference TR020002/APP/5.2-1).
	RiverOak should identify potential sources of odour in the ES, and proposals to minimise such emissions	Y	An odour assessment has been included as Appendix 6.4 of the ES (document reference TR020002/APP/5.2-6). This includes an assessment of potential odour sources and any relevant mitigation measures.
	PHE do not accept that the traffic impacts on air quality have been adequately assessed and are demonstrably de minimis. They ask the applicant to work with the Local Authority to model AQ impacts	Y	A full assessment of road traffic impacts has been included in Chapter 6 of the ES (document reference TR020002/APP/5.2-1).
	Ensure that the CEMP deals with dust, noise, land contamination, spillages and accidental releases to the air, and air quality impacts on the highway	Y	The CEMP, Appendix 3.2 of the ES (document reference TR020002/APP/5.2-6) sets out mitigation measures to be employed on site during the construction phase, including these areas.
	Seek a risk assessment for chemical releases as well as the mechanism for controlling them via the CEMP	Y	A qualitative risk assessment has been undertaken within Chapter 17 of the ES (document reference TR020002/APP/5.2-3). Further major accident and disaster risk assessment, with risk reduction to ALARP is indicated for chemicals stored and used during construction.
	Recommend that the ES includes an inventory of chemicals likely to be stored on the site and how any risks to human health will be managed	Y	The CEMP, Appendix 3.2 of the ES (document reference TR020002/APP/5.2-6) notes the environmental risks from releases of these and recommends appropriate containment measures under applicable regulatory regimes. An Airport Manual will be produced by RiverOak for the operational phase in accordance with EASA requirements.

	RiverOak is asked to work with the EA to consider any releases to water sources, and to insert a summary and control measures in the ES	Y	<p>An assessment of the Proposed Development's effects on controlled waters, including Pegwell Bay, has been carried out and is reported in Chapter 10 of the ES (document reference TR020002/APP/5.2-1), specifically in section 10.10. Please also refer to Chapter 8 of the ES.</p> <p>Discussions with the EA on this topic have been held and are detailed in Table 10.5 of Chapter 10 of the ES (document reference TR020002/APP/5.2-1).</p>
	Leaks and spills from construction plant should not be scoped out until the CEMP has been produced and TDC and the EA are happy with that issue	Y	<p>Appropriate mitigation to prevent / manage any leaks and spills has been included within the CEMP, Appendix 3.2 of the ES (document reference TR020002/APP/5.2-6).</p>
	Further consideration needs to be given to the potential for existing contamination from radioactive materials	N	<p>A report from the Defence Evaluation Research Agency (DERA) Radiation Protection Services suggested that, as with many RAF sites, radioactive materials, and particularly radium luminescing material, may have been present in equipment buried at the site and may have been disposed of in waste pits or areas where ash was disposed of. Further site investigation will screen arisings for radioactivity, especially in areas of ash or waste tips. This will allow any necessary mitigation to be addressed.</p> <p>Information on this is covered within section 10.4 (specifically paragraph 10.4.45) of Chapter 10: Land Quality of the ES (document reference TR020002/APP/5.2-1). Assessment of the historic use of radioactive material is provided in the desk study in Appendix 10.1 of the ES (document reference TR020002/APP/5.2-10 – 5.2-12) and summarised in section 10.4 of the ES (document reference TR020002/APP/5.2-1).</p>

	Encourage that RiverOak take up the offer of discussions (perhaps with KCC's Public Health team).	Y	The Kent Director of Public Health (DPH) was consulted on the HIA Scoping Report in October 2017, and following further correspondence with the DPH concerning other consultee contacts, the Clinical Chair of the Thanet Clinical Commissioning Group was consulted by teleconference in March 2018.
	Recommend that RiverOak have contact with the public health/health and wellbeing teams at the relevant Local Authorities, to contribute to the socio-economic impact assessment, and for any Health Impact Assessment	Y	RPS has engaged with the Kent and Thanet public health and wellbeing teams during the HIA scoping and assessment stages as detailed above, included in Chapter 15 of the ES (document reference TR020002/APP/5.2-2).
	PHE's preference is for consideration of the direct and indirect significant effects of the Proposed Development on the population and human health	Y	This assessment has been undertaken through the Health Impact Assessment, Appendix 15.1 of the ES (document reference TR020002/APP/5.2-13).
	PHE request confirmation from Defra that the background pollutant levels are taken, as these will have changed since the airport closed	N	<p>The Defra concentration maps include a contribution from the former airport. Defra provides a tool for removing sector contributions so this could be used to remove this contribution. However, the Defra maps are not used for background concentrations where suitable monitoring data is available, since in these cases it is found that monitored concentrations are higher.</p> <p>This is discussed further in Chapter 6 of the ES (document reference TR020002/APP/5.2-1) For pollutants for which suitable monitoring data is not available, the small amount of double counting is acceptable. This approach follows best practice by being conservative and by being anchored in the best available data.</p>
	RiverOak should identify and assess the electric and magnetic fields emissions	N	Following the DECC Voluntary Code of Practice for assessing EMF from electricity distribution infrastructure, overhead power lines or

			underground cables operating at $\leq 132\text{kV}$ are compliant by design with guideline public exposure levels set to protect public health, as are substations at or beyond their publicly accessible perimeter.
	PHE recommend that RiverOak develops a Decommissioning Environmental Management Plan	N	Decommissioning is not considered in detail in the ES as it is expected that the airfield would operate in perpetuity but is considered in general terms, as it is very difficult to predict with any accuracy how such an exercise would be undertaken.
	There should be a Waste Management Plan	Y	Information concerning waste is discussed within the ES (document reference TR020002/APP/5.2-1), specifically within Chapter 3: Description of the Proposed Development and is also further reflected upon within the CEMP (Appendix 3.2 of the ES (document reference TR020002/APP/5.2-6)).
	PHE are seeking a comprehensive traffic assessment	Y	The Transport Assessment (document reference TR020002/APP/5.2-15) provides the details on the traffic generation and distribution methodology that has been used to understand the developments potential environmental impact. The methodology is comprehensive and wide ranging.

Table 7.3: Local Authority responses and how RiverOak had regard to the responses

Local Authority	Summary of Response	Change? Y / N	Regard had to response
Canterbury City Council (CCC)	<p>In principle CCC supports the continued role that Manston Airport can provide in the economic well-being of East Kent. CCC is however concerned about the potential for adverse impact on residents of the night-time flying proposal and does not think it is justified.</p> <p>CCC wishes the method of operation to be kept to the current one and that further discussions are held regarding the monitoring of night-time flying activity.</p>	Y	<p>RiverOak has noted this response and CCC's concerns. The business case being put forward by RiverOak for Manston does involve a higher level of flights than when the airport was previously open. However, RiverOak does recognise that some respondents have concerns about night time flying and has therefore included a proposed Noise Mitigation Plan as part of the application (document reference TR020002/APP/2.4). This includes the setting of an annual noise Quota Count to limit night-time noise effects and the provision of noise insulation scheme.</p>
Dover District Council (DDC)	Seek involvement in the preparation of the CEMP	Y	<p>RiverOak has produced a draft CEMP and included it in its application submission, Appendix 3.2 of the ES (document reference TR020002/APP/5.2-6). The content of this draft CEMP has been reviewed by DDC and incorporates their feedback as appropriate.</p>
	Seek further information about the economic and housing implications of the jobs being created	Y	<p>Further information about the economic and housing implications of the jobs being created is provided in Chapter 13 of the ES (document reference TR020002/APP/5.2-2).</p> <p>Additionally, the RPS Employment and Housing Land Technical Report, Appendix 6 of the Planning Statement (document reference TR020002/APP/7.2) concludes that there is no requirement for additional homes in the study area by 2039 to meet the forecast employment needs of the Proposed Development.</p>

	Ask for involvement in the visual assessment of the control tower and other tall structures	Y	DDC were contacted via email regarding this matter (8th November 2016), but were unwilling to engage in the absence of a Planning Performance Agreement (PPA) (confirmed in email correspondence 10th November 2016). RiverOak has agreed to enter into a PPA with DDC and this is currently being progressed.
	Ask for involvement in the development of noise mitigation strategy	N	A proposed Noise Mitigation Plan has been submitted as part of the application (document reference TR020002/APP/2.4) and includes the setting of an annual noise Quota Count to limit night-time noise effects and the provision of noise insulation scheme. RiverOak has not sought input on this plan from DDC at the pre-application stage and notes that the examination phase is the appropriate forum for the examination of such issues.
	Seek a PPA	Y	RiverOak has agreed to enter into a PPA with DDC and this is currently being progressed
	RiverOak is asked to consider making improvements to A256 and A258, or a contribution towards them	N	The Transport Assessment (document reference TR020002/APP/5.2-15) sets out the impact on the road network of the traffic generated by the Proposed Development and appropriate mitigation has been identified. Junction improvements beyond the immediate boundaries of the site are not included as part of the DCO application and will be secured via separate planning applications and 278 agreements, although the A256 and A258 are not expected to require improvement as a result of the project.
	Ask for involvement in the preparation of the five travel-related documents mentioned in the 2017 PEIR	N	The Transport Assessment (document reference TR020002/APP/5.2-15) sets out the details of the proposed travel-related documents mentioned in the 2017 PEIR and representations will be able to be made upon these.

Kent County Council (KCC)	Have air quality monitoring in place during operation	Y	This issue was also raised by TDC. The Applicant agrees to undertake monitoring of air quality during construction and operation of the Proposed Development – see Chapter 6 of the ES (document reference TR020002/APP/5.2-1).
	Would like to engage with the Applicant on drainage strategy	Y	Wood, on behalf of RiverOak, has been engaging with KCC on drainage strategy and has taken on board the Council's comments in drafting its draining strategy which is appended as Appendix 8.3 to Chapter 8 of the ES submitted with the application (document reference TR020002/APP/5.2-8).
	Ensure ES deals with bats, great crested newts and reptiles	Y	The 2018 PEIR included an assessment of the effects of bats (section 7.11) and reptiles (section 7.12). As a result of the findings of the desk study and water body assessments, it was concluded that great crested newts (GCN) are likely to be absent from the site and suitable aquatic habitat within 500m of it and as such GCN were scoped out from further assessment. (Table 7.4). An assessment of bats, great crested newts (see above) and reptiles is also reported in Chapter 7 of the ES (document reference TR020002/APP/5.2-1).
	ES should demonstrate that any off-site mitigation is achievable	Y	RiverOak has considered what, if any, offsite mitigation is necessary or achievable as part of its proposals and has identified potential sites. Requirement 9 requires these to be secured before development can commence.
	The results of survey work are needed to understand the potential impacts of the development, both on buried archaeology and on historic structures in the airfield. The parameters of previous evaluation differs to the proposal led	N	It would not be best practice to carry out a second evaluation across the whole site, as this would risk damaging any heritage assets further and not contribute to further knowledge. A programme of works to include geophysical survey, evaluation and building survey is proposed as discussed and presented in Chapter 9: Historic

	<p>by RiverOak and requires separate additional works.</p>		<p>Environment, paragraphs 9.8.6 and 9.9.6, of the ES (document reference TR020002/APP/5.2-1). In the absence of this information currently, the assessment presented in this ES provides a 'worst-case' scenario (see Chapter 5: Approach to the ES, paragraphs 5.4.15-5.4.20) (document reference TR020002/APP/5.2-1).</p>
	<p>Detailed assessment, including the significance of heritage assets (both designated and non-designated) and in context of setting and character is required. Cumulative effects should also be considered.</p>	<p>Y</p>	<p>Detailed assessment of all heritage assets is provided in the desk-based assessment, Appendix 9.1 of the ES document reference TR020002/APP/5.2-8 and 5.2-9). The Environmental Impact Assessment significance of all heritage assets is presented in Appendix 9.5 (document reference TR020002/APP/5.2-9) of the ES and cumulative effects are considered in Chapter 18: Cumulative Effects Assessment of the ES (document reference TR020002/APP/5.2-3).</p>
	<p>There are likely to be remains that merit avoidance of impact from the proposal and where mitigation by investigation is an inadequate approach. Similarly, it is hoped that non-designated historic aviation features are retained as part of the development proposals to ensure that what remains of the historic sense of place is maintained for the future.</p>	<p>Y</p>	<p>A programme of mitigation measures which include survey and investigations will be conducted at the further detailed design stage (see sections 9.8.6 and 9.9.6 of Chapter 9: Historic Environment of the ES (document reference TR020002/APP/5.2-1)). Contingency planning for avoidance of archaeological remains or incorporation of built heritage assets by design can only be discussed in principle at this stage and is reflected by the flexibility inherent in outline masterplanning. For this reason, the assessment presented in this ES provides a 'worst-case' scenario, whereby it is assumed that highly significant remains and built heritage assets of at least medium significance will be present and in the absence of avoidance or incorporation this is assessed as a potential significant adverse effect (see Chapter 5: Approach to the ES, paragraph's 5.4.15-5.4.20). It is however also noted that the flexibility present in the masterplan will allow any significant finds to be mitigated by avoidance or removal. This approach has been agreed in principle with Historic England and KCC Archaeology and the precise requirements will be confirmed</p>

			following intrusive investigations which it has been agreed cannot take place until after the application has been submitted.
	Proposals to move the two museums should consider direct impacts and indirect effects caused by changes in accessibility, inter relationship and relationship with the airfield heritage.	Y	An area of approximately 3ha has been safeguarded in the DCO application for operation of the RAF Manston History Museum, Spitfire & Hurricane Memorial Museum and memorial garden. This area encompasses the current museum and memorial grounds and allows for additional areas in which the museums could be expanded or relocated. A decision on whether to proceed with any relocation works will only be made after consultation with the museum operators to ensure that the museums' needs are reflected. A preliminary meeting was held between RiverOak and the museums on 26 March 2018.
	Recommend that a Health Impact Assessment is carried out, especially for Newington and Ramsgate	Y	A Health Impact Assessment has been carried out, Appendix 15.1 of the ES (document reference TR020002/APP/ TR020002/APP/5.2-13). The Health Impact Assessment community profile is primarily focussed on Thanet District which encompasses Newington and Ramsgate.
	Consider using 'N-above' metrics for aircraft noise, as recommended in the CAA's airspace change guidance	N	The 'N-above' (N70 and N80 contour) assessment, for airborne aircraft (during approach and departure) is not used in the ES but may be required by the subsequent CAP1616 airspace change consultation.
	Design and appraisal of aircraft noise impacts should be rigorous and transparent, including changes in frequency and volume to previously affected areas	Y	Noise impacts have been fully assessed in Chapter 10 of the ES (document reference TR020002/APP/5.2-1).

Show LOAEL area affected in ES	Y	<p>Figures 12.4 and 12.5 of the ES (document reference TR020002/APP/5.2-4) show indicative LOAEL contours for daytime and night-time during the opening year respectively.</p> <p>Figures 12.6 and 12.7 of the same document show LOAEL indicative daytime and night-time contours for the forecast maximum capacity year (i.e. Year 20) respectively. All modelling is based on the latest assumptions for the future use of the airport, including 'most likely' flight path and forecast future operations.</p>
Include a Quota Count equivalent to eight night flights	N	RiverOak is proposing a night time policy which imposes movement limits combined with measures to reduce noise. Further information can be found in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4).
Re-establish consultative committee, which will receive full aircraft noise quantitative assessment at the appropriate time	Y	The Noise Mitigation Plan (document reference TR020002/APP/2.4) commits to a consultative committee being re-established.
Offer insulation and also financial compensation	Y	The Noise Mitigation Plan (document reference TR020002/APP/2.4) sets out the mitigation measures that would be adopted and this includes insulation and financial compensation in certain scenarios.
Request a PPA and more engagement	Y	RiverOak presented its plans to a committee of the KCC Cabinet on 21 November 2017 and has agreed to enter into a PPA with KCC; this is currently being finalised and will be entered into shortly.
Would like to discuss how the Proposed Development could be reflected in their Thanet Transport Strategy	Y	Scoping discussions have been held with KCC, which has included the request by RiverOak for the airport proposals to be included within the strategic transport modelling which is being undertaken by KCC on

			behalf of TDC, although the recent rejection of the TDC plan has increased the uncertainty surrounding KCC's transport strategy.
	Restrict HGV access to certain local roads or improve those roads, e.g. B2190	Y	HGV access will be restricted to the Manston Road/Spitfire Way corridor, or the Canterbury Road West route into the fuel farm. This would be applicable to the construction HGVs and HGVs associated with the operational phase of the airport. See the Transport Assessment's Construction Traffic Management Plan at Appendix K (document reference TR020002/APP/5.2-25)
	Staff and northern grass users could overload local roads with cars	N	A Transport Assessment (document reference TR020002/APP/5.2-15) has been carried out and is reported on in Chapter 15 of the ES (document reference TR020002/APP/5.2-2). This sets out the impact the Proposed Development could have on the local road network and what mitigation measures are proposed to deal with this.
	Proposals do not mention Local Transport Plan 4 (LTP4) proposal for highway through northern grass	Y	LTP4 is recognised within the Transport Assessment (document reference TR020002/APP/5.2-15) and a sensitivity test has been undertaken to assess the implications of the LTP4 proposals.
	Consider impacts on more roads, namely Manston Court Road, Manston Road, the A299 and parts of the A256	Y	All the roads referenced are included in the scope of assessment for the Transport Assessment (document reference TR020002/APP/5.2-15). The impact on these links and junctions and, where required, any mitigation proposed, is set out in detail in the Transport Assessment and in section 14.9 of Chapter 14: Traffic and Transport of the ES (document reference TR020002/APP/5.2-2).
	More transport modelling needed to assess impact of proposals fully	Y	RiverOak has undertaken a comprehensive assessment of the key local junctions. This is considered fully in the Transport Assessment

			<p>(document reference TR020002/APP/5.2-15) and in Chapter 14 of the ES (document reference TR020002/APP/5.2-2).</p> <p>As part of the Transport Assessment, detailed junction models for 28 local junctions as well as all the access junctions to the site have been undertaken to assess where mitigation measures may be required. The scope of these junctions includes Broadstairs, Margate, Ramsgate, Manston, key A299 junctions and many others.</p>
Surrey County Council	Surrey County Council confirmed that they had no comments to make on the proposals at this stage.	N	RiverOak has noted this and thanks Surrey County Council for responding to the consultation.
Thanet District Council (TDC)	Asked whether there would be air quality monitoring during construction and operation	Y	This issue was also raised by KCC. RiverOak agrees to undertake monitoring of air quality during construction and operation of the Proposed Development, by providing funding for TDC to reinstate the continuous monitor at Manston Airport site ZH3.
	Odour emissions from aircraft should also be assessed	Y	An odour assessment has been included as Appendix 6.4 of the ES (document reference TR020002/APP/5.2-6) . This includes an assessment of potential odour sources and any relevant mitigation measures.
	TDC planning guidance requires air quality emissions mitigation assessment given the predicted levels and uncertainty	N	An assessment of air quality emissions mitigation is provided in Chapter 6 of the ES (document reference TR020002/APP/5.2-1) .
	Include TDC in scoping of investigations at Jentex site	Y	Further consultations are on-going with the EA and TDC will be updated as and when appropriate.
	Regulators need to agree how contaminants will be handled	Y	Site specific measures required to address effective identification, protection, containment, attenuation, management and recovery of potential contaminants at the site during the construction and

			<p>operational phases have been and are being discussed with the regulators, including the EA, TDC and other stakeholders as appropriate.</p> <p>The management of contaminated soil during construction is dealt with via the CEMP (Appendix 3.2 of the ES (document reference TR020002/APP/5.2-6) and will be further informed by the site investigation. This is set out in relation to the fuel tanks in sections 10.8 and 10.9 of Chapter 10: Land Quality of the ES (document reference TR020001/APP/5.2-1). The details of consultation with the regulators is set out in section 10 of Chapter 10 and includes discussion on the CEMP.</p> <p>Measures for the operational phase will be incorporated in an airport manual that will be produced in accordance with CAP 168 and EASA requirements.</p>
	Impact of a plane crash should form part of the assessment of contaminant	Y	<p>An airport manual will be produced for the operational phase of the airport. The manual will include measures:</p> <ul style="list-style-type: none"> • to manage the availability of aviation fuel and its storage, handling and quality control; • to manage the removal of disabled aircraft to comply with regulatory requirements relating to accidents, incidents and Mandatory Occurrence Reporting (MOR); and • that ensure the integrated management of response to an aircraft incident/accident taking account of the complexity and size of the aircraft operations. <p>This issue is discussed further in Chapter 17 of the E S (document reference TR020002/APP/5.2-3).</p>
	Assessment of unexploded ordnance is required	N	<p>A preliminary UXO risk assessment has been undertaken for the site and is included in Appendix B of the Phase 1 Land Quality</p>

			Assessment (Appendix 10.1) of the ES (document reference TR020002/APP/5.2-10 – 5.12). The report identified that there is a medium to high probability of UXO encounter on the site (probability rating of 4, on a scale of up to 5). As such a detailed UXO threat and risk assessment will be carried out in accordance with CIRIA C681 ('Unexploded ordnance: a guide for the construction industry') prior to any intrusive works.
	Consider above-ground tanks at Jentex site because of its location in SPZ1	Y	The possible re-use of the Jentex site has been discussed with the EA, TDC and Southern Water; additional details can be found in Tables 10.5, 10.6 and 10.7 of Chapter 10: Land Quality and detailed within Chapter 8 of the ES (document reference TR020002/APP/5.2-1). The majority of the area is not in SPZ1. Consideration will be given to the design of the tanks including whether they will be above ground or underground tanks, taking into account the environmental issues and safety issues; the EA indicated a preference for above ground tanks, as does HSE. As such, the preliminary design is based on the former.
	Care must be taken that contaminants are not released when doing investigations	Y	The Phase 1 desk study (Appendix 10.1 of the ES (document reference TR020002/APP/5.2-10 – 5.2-12)) includes recommendations for a staged intrusive investigation.
	Define extent of 'wider regional economy' when referring to jobs	N	The use of wider regional economy in the consultation document refers to the UK economy that is outside the specific economies of Thanet and East Kent.
	Looking for surveys of vulnerable groups etc. (PEIR 13.9.7)	N	Primary research including surveys of vulnerable groups was not necessary in the context of the 2017 PEIR. Sufficient demographic information was available through readily available data sources

			including, but not limited to, the 2011 Census, NOMIS and the 2006 local plan.
	Use 2015 Cambridge model for tourism numbers, not 2012 Experian data	Y	The 2015 Cambridge model has been used.
	More evidence required on economic benefits other than the Azimuth report	N	The main source of evidence is the Azimuth Report (document reference TR020002/APP/7.4). It itself references reports and evidence which could otherwise have been framed as providing additional information. However, baseline data for the economy has also been collected from sources including NOMIS, Thanet Economic and Employment Assessment, Economic Growth Strategy for Thanet. These all provide context which the economic factors are assessed against.
	Need to consider effect of greater jobs on housing need and pressure on services	Y	Further information about the economic and housing implications of the jobs being created is provided in Chapter 13 of the ES (document reference TR020002/APP/5.2-2). Additionally, the RPS Employment and Housing Land Technical Report, Appendix 6 of the Planning Statement (document reference TR020002/APP/7.2) concludes that there is no requirement for additional homes in the study area by 2039 to meet the forecast employment needs of the Proposed Development.
	Need to consider loss of potential for 2,500 houses as well as 112 houses on the Jentex site	N	As of January 2018, the Manston Airport site is no longer being promoted as a mixed use settlement in the new draft Thanet Local Plan so the Council themselves are looking to reallocate sites to absorb the 2,500 homes previously allocated at the Airport. TDC launched a 'Call for Sites' in February 2018 which invites anyone to submit details of a site that they consider suitable for development. This could include sites suitable for housing development which have not yet been

			considered by TDC that could absorb housing displaced from the Jentex site.
	The Azimuth report refers to onsite training but the 2017 PEIR doesn't	Y	The Applicant has investigated this discrepancy and this has been updated for the ES (document reference TR020002/APP/5.2) so that it aligns with the Azimuth Report (document reference TR020002/APP/7.4). Chapter 13 Socio Economics of the ES (document reference TR020002/APP/5.2-2) includes discussion on potential training opportunities, specifically within the section titled 'Additional Measures during Construction and Operation'.
	The cumulative assessment does not include Eurokent or Manston Green as receptors	Y	These locations have been included in the scope of the cumulative assessment in Chapter 18 of the ES (document reference TR020002/APP/5.2-3).
	Uncertain about how the Proposed Development will be funded	Y	A Funding Statement (document reference TR020002/APP/3.2) setting out how the Proposed Development will be funded forms part of the application.
	Add six more visual impact viewpoints and more to the south, plus comments on three of the chosen viewpoints	Y	The six additional viewpoints requested by TDC were included in the 2018 PEIR and are in the ES (document reference TR020002/APP/5.2-12). The further comments regarding three other viewpoints are also addressed in these documents. Details of the additional viewpoints and the approach taken to the three other viewpoint comments are set out in Chapter 11: Landscape and Visual, Table 11.7 of the 2018 PEIR and Chapter 11: Landscape and Visual, Table 11.5 of the ES (document TR020002/APP/5.2-2).
	Need receptors for impact of lighting from the development	N	Lighting for the Proposed Development will form part of the detailed design process and, within the confines of the CAA regulations for airports, that scheme would adopt lighting principles that seek to

			<p>minimise light spill. It is likely that such measures would primarily be applied to the airport related development on the Northern Grass area and any landside components of development that are not the subject of specific lighting design requirements. This will be completed as this detailed design information becomes available and will provide additional information to supplement, but not supersede, the assessments made in Chapter 11 Landscape and Visual of the ES (Document reference TR020002/APP/5.2-2).</p>
	<p>Agree photomontages for assessment of impact on heritage assets with the Council as well as Historic England</p>	N	<p>Photomontages of views from the heritage assets agreed in consultation with Historic England and KCC and supplied with Chapter 11: Landscape and Visual of the ES (document reference TR020002/APP/5.2-12) have been used to inform the assessment of indirect effects i.e. in section 9.10 of Chapter 9: Historic Environment of the ES (document reference TR020002/APP/5.2-1) and the desk based assessment, (Appendix 9.1 of the ES (document reference TR020002/APP/ /5.2-8 – 5.2-9).</p>
	<p>Not clear if visual assessment has affected the masterplan at all or whether it will</p>	Y	<p>The design of the Proposed Development has evolved through an iterative process of dialogue between the environmental assessment and Proposed Development design teams. The visual effects identified as requiring mitigation and the resultant measures incorporated into the design are set out in Table 11.11 of Chapter 11: Landscape and Visual, of the ES (document reference TR020002/APP/5.2-2).</p>
	<p>Consider moving industrial buildings away from residential properties on Manston Court Road</p>	Y	<p>A philosophy of locating the business development away from adjacent residential properties and use of landscaped screening has been adopted in the masterplan (document reference TR020002/APP/7.1).</p>

			A landscaping zone has been introduced which assists with screening the residential properties and moves the proposed building locations away from these properties.
	A 'Masterplan narrative' is referred to but no further information or documents are provided	Y	A detailed description of the Masterplan has been included in Chapter 3 of the ES (document reference TR020002/APP/5.2-1) and the Design and Access Statement document reference TR020002/APP/7.3).
	Need noise mitigation strategy and noise insulation scheme	Y	RiverOak is proposing a night time policy which imposes movement limits combined with measures to reduce noise. Further information can be found in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4).
	Include Nethercourt and Manston Green as noise receptors, including a permanent monitoring station at the latter	Y	<p>A further round of baseline noise monitoring was undertaken within the Nethercourt Estate. The monitoring survey included a combination long-term noise monitoring and a characterisation of the area, and a summary is presented in section 12.6 of Chapter 12: Noise of the ES (document reference TR020002/APP/5.2-2).</p> <p>Manston Green is included as a receptor location for the ES and a summary of indicative future noise effects upon Manston Green is presented in section 12.9 of the same Chapter.</p> <p>The Noise Mitigation Plan (document reference TR020002/APP/2.4) includes a commitment for permanent continuous noise monitoring, intended to be used for the purposes of checking compliance against proposed daytime and night-time noise limits and as such the preferred location in accordance with industry standard practice is 6.5km from the start of take-off roll under each flight path.</p>

	Consider Vortex Strike in the ES	N	The Noise Mitigation Plan (document reference TR020002/APP/2.4) includes a wake turbulence policy. The policy to be adopted for the airport will operate in the same way as established wake turbulence policies at other UK airports.
	Works causing nuisance should not start before 8am (but can have 30 mins start-up time)	N	The Applicant's working time proposals are set out in detail in the Construction Environment Management Plan, Appendix 3.2 of the ES document TR020002/APP/5.2-6 . During Phase 1, the Proposed Development programme assumes a 6-day working week, with construction generally confined to the hours of 07:30 to 17:30 Monday to Friday and Saturday 7:30 to 13:00. There is no planned working on Sundays or Bank Holidays.
	Would expect s106 agreement to cover controls on noise levels, with 8 night flights as an absolute maximum	N	RiverOak is proposing a night time policy which imposes movement limits combined with measures to reduce noise. Further information can be found in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4).
	Request a PPA	Y	RiverOak has agreed to enter into a PPA with TDC and this is currently being progressed.
	Aircraft recycling should be included as a potential contaminant source.	N	Previous site activities have been assessed in the Phase 1 Desk Study (Appendix 10.1 of the ES (document reference TR020002/APP/5.2-10 – 5.2-12)). Future aircraft recycling would be a permitted activity. The permit would require the operator to mitigate the risks cited. This is not part of the Land Quality assessment.

	Aircraft recycling has not been assessed and should be, especially in respect of potential contamination.	N	Previous site activities have been assessed in the Phase 1 Desk Study (Appendix 10.1 of the ES (document reference TR020002/APP/5.2-10 – 5.2-12)). Future aircraft recycling would be a permitted activity. The permit would require the operator to mitigate the risks cited. This is not part of the Land Quality assessment.
	An assessment of operational junction capacity should be included in the ES (e.g. Spitfire Junction?)	Y	<p>A Transport Assessment (document reference TR020002/APP/5.2-15) has been carried out and is reported on in Chapter 14 of the ES (document TR020002/APP/5.2-2). This assesses, amongst other things, operational junction capacity and puts forward suggestions for mitigating against impacts.</p> <p>As part of the Transport Assessment detailed junction models for 28 local junctions as well as all the access junctions to the site have been prepared to inform where junction mitigation proposals may be required.</p> <p>The junctions modelled include junctions in Broadstairs, Margate, Ramsgate and Manston, key A299 junctions and many others and include the key junctions along Spitfire Way.</p>
	The Transport Assessment should include any increased housing requirement	Y	<p>A growth methodology taking into account increased potential housing requirements as well as in increase in local jobs has been applied to the base traffic counts undertaken on the local highways network. Due to the future locations of jobs and houses being unknown at this stage, a robust network wide growth methodology has been applied.</p> <p>This is explained in more detail in the Transport Assessment (document reference TR020002/APP/5.2-15).</p>
	No optimism bias has been allowed for in the cost estimates	N	Optimism bias is defined as, “ <i>the difference between a person’s expectation and the outcome that follows</i> ” (Sharot, 2011, p. 941). There is little research on the subject, particularly as it pertains to air

			<p>traffic forecasting. However, in order to avoid any bias (optimism or pessimism), efforts to quality assure the analysis should be made. For this study, the methodology used to forecast air freight traffic has been peer reviewed by Loughborough University and by the Proposed Development's consultancy team. The methodology used was included in this consultation and only the TDC comment shown to the left was received. It should also be noted that the Council's own forecast by AviaSolutions made no mention of either optimism or pessimism bias.</p>
	<p>The growth in automation has not been considered.</p>	Y	<p>Growth in automation has clearly taken place in passenger processing, including security body scanners, bag drop, and self-printed boarding cards. However, cargo handling has thus far been less automated. One exception is the automatic package routing that integrators have adopted in their warehouses. This automation has largely taken place and is reflected in the calculations of employment made in the ES.</p> <p>The recent trials to automate the loading and unloading of ULDs from belly operations are not relevant to the all-freight sector that will provide the focus for Manston Airport. The process used to handle all-freight aircraft requires relatively low levels of manpower compared to passenger handling (and this is reflected in the employment calculations). Therefore any automation would have a relatively small impact. Additionally, the investment in Research & Development and implementation required to make a significant impact on the job creation forecasts shown in this report is unlikely to be commercially viable.</p>
	<p>No information has been provided about who is going to deliver the freight tonnage and therefore create the job numbers stated. Without this information TDC questioned whether the</p>	N	<p>Specific details of air freight operators has not been included in the forecast or any others of this type. Indeed, this level of detail is never provided in air traffic forecasts such as those calculated by the Airports Commission, Heathrow in support of a third runway and Gatwick for</p>

	economic benefits of the airport in terms of job creation can be considered deliverable.		<p>their proposed second runway. Yet job creation is still derived from these figures.</p> <p>Unlike these forecasts, a considerable level of detail is provided in Volume III of the Azimuth Report (document reference TR020002/APP/7.4) which formed part of the suite of consultation documents for the 2017 and 2018 statutory consultations. The information included category of aircraft forecast and the routes expected to be flown.</p> <p>Jobs created by the airport operator are also shown in detail, including job function, in Volume III of the Azimuth Report.</p>
London Borough of Bexley	No comment	N	
Parish councils are not strictly Local Authorities for this purpose but their responses are included here			
Acol Parish Council	Provide more parking and exhibition space for museums	Y	An area has been safeguarded for improvements to the existing museums.
	RiverOak should allow no more than the night flights already provided for under the existing s106 agreement	Y	RiverOak is proposing a night time policy which imposes movement limits combined with measures to reduce noise. Further information can be found in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4).
Cliffsend Parish Council	Care should be taken to avoid contamination of open water (including to not attract mosquitos)	Y	As stated in Chapter 8 Freshwater Environment of the ES (document reference TR020002/APP/5.2-1), water treatment will take place on site in attenuation ponds and water will only be pumped to the discharge pipe from these ponds once appropriate quality standards are reached.

			<p>It is proposed that there are two ponds on site, one of which will receive 'dirty' run-off (e.g. that containing de-icer) and one receiving 'clean' run-off. Water will only be discharged from the 'dirty' run-off pond once treatment is complete and pumped discharge will only take place from the 'clean' pond.</p> <p>These ponds will be sized to take account of the capacity of the pipe and pump</p> <p>Further details are included in the Site Drainage Plan and Flood Risk Assessment, Appendix A of Appendix 8.2 of the ES, and Appendix 8.1 of the ES respectively (document reference TR020002/APP/5.2-7 and 5.2-8).</p> <p>In recognition of the recorded presence of non-native mosquitoes in Kent then future measures will include:</p> <ul style="list-style-type: none"> • Recommendation of the inclusion of Manston Airport in to the Public Health England (PHE) mosquito surveillance programme which currently monitors 30 UK ports and airports. • Minimisation of areas of open "stagnant" water within the constraints of the site drainage plan. • Periodic treatment using approved methods to eliminate larvae <p>A mosquito risk assessment involving survey work (focusing on areas of open water), identification of species and an assessed disease risk, (noting behaviour (e.g. bite risk) and assessing the risk of new species etc.) could be undertaken as a precursor to a decision on whether treatment and/or monitoring is needed.</p>
	Seek a limit of no more than 8 flights a night	Y	RiverOak is proposing a night time policy which imposes movement limits combined with measures to reduce noise. Further information

			can be found in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4).
	The Council ask that RiverOak prevent traffic from using Canterbury Road West	N	RiverOak will seek to limit the use of this road through its Construction Traffic Management Plan and Airport Surface Access Strategy (Appendices K and O at document reference TR020002/APP/5.2-25) but given the proximity of the road to the site of the fuel farm, the road cannot be completely closed to traffic.
Minster Parish Council	Strongly agree with the proposals and believe the Airport would be a great benefit to Minster Parish, Thanet and the County of Kent.	N	RiverOak has noted this response and is grateful to Minster Parish Council for engaging in the consultation process.
	Agree with the Outline Business Case in terms of the opportunities this site holds for the future of Thanet and the wider South East area.	N	RiverOak notes and welcomes this response. This case has now been developed and forms part of the DCO application as the Azimuth Report (document reference TR020002/APP/7.4).
	Strongly support the suggestion that priority will be given to local people in terms of employment opportunities, and request an undertaking that training opportunities will be developed for young people.	N	RiverOak undertakes that training opportunities will be developed for young people living locally and that, subject to the operation of law, priority will be given to local people in terms of job opportunities and recruitment.
	Request assurance that the new location for the museums is integral to the main airport operational area to maintain its current highly visible presence.	Y	An area of approximately 3ha has been safeguarded in the DCO application for operation of the RAF Manston History Museum, Spitfire & Hurricane Memorial Museum and memorial garden. This area encompasses the current museum and memorial grounds and allows for additional areas in which the museums could be expanded or relocated. A decision on whether to proceed with any relocation works will only be made after consultation with the museum operators to

			ensure that the museums' needs are reflected. A preliminary meeting was held between RiverOak and the museums on the 26 March 2018.
	Proposals to manage construction impacts welcome. Primary concern is to improve road access before major movement of construction materials commences to avoid delays on roads surrounding the airport.	Y	<p>A preliminary Construction Traffic Management Plan has been prepared and forms part of the Transport Assessment (Appendix K in document TR020002/APP/5.2-25). This sets out the detailed arrangements for the conveyance of construction traffic.</p> <p>It is proposed that HGV construction traffic will only use the A299 Minster Road, Spitfire Way corridor into the site area. Any improvements required to allow the conveyance of these trips will be undertaken before commencement of operations. The Transport Assessment and DCO masterplan (document reference TR020002/APP/7.1) sets out the proposed access improvements required for the operational element of the Proposed Development and it is these improvements (access and local road widening) that will be implemented before major construction works are undertaken.</p>
	Excessive night flights beyond that which is generally acceptable should carefully considered.	Y	RiverOak is proposing a night time policy which imposes movement limits combined with measures to reduce noise. Further information can be found in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4).

Table 7.4: PILs responses by letter and how RiverOak had regard to the responses (These are PILs that were identifiable from the name and/or address provided on consultation responses. Other PILs may have also responded but as they are unidentifiable their responses are grouped in Chapter 8 below, in Tables 8.9 – 8.15.)

Consultee Response ID	Date consulted	Summary of Response	Change? Y / N	Regard had to response
BHLF-M3TP- EBRN-B	12 June 2017	Strongly objects to proposals.	N	RiverOak notes this response although it disagrees.
		Questions why RiverOak did not purchase the Site when it was for sale or put funds in place to allow TDC to obtain a CPO, without any risk to the tax payer.	N	RiverOak offered the site owner her asking price in May 2014 but the offer was refused. The DCO process removes any financial risk to TDC or the tax payer.
		Very concerned about increased air pollution and the noise, smell and vibration from night flights and their detrimental impact on local residents' health and quality of life.	N	The Health Impact Assessment, Appendix 15.1 of the ES (document reference TR020002/APP/5.2-13) assesses the potential health impacts associated with changes in noise and air pollution. Where adverse effects are predicted, measures to mitigate these are set out in that Chapter.
		Believes that proposals will be detrimental to tourism in Ramsgate.	N	The effects on tourism are discussed within Chapter 13: Socio-Economics of the ES (document reference TR020002/APP/5.2-2). Tourism receptors in the vicinity of the Proposed Development may experience effects resulting from the increased activity in the geographical area, in both construction and operational phases. For tourism businesses within the surrounding area, the increased visitor numbers associated with the airport operation, in conjunction with increased incomes from employees at Manston, will likely lead to increased demand for tourism facilities and associated spending in the locality. This could result in improvements to their volume of trade.

				<p>In terms of indirect impacts, such as increased traffic, noise or dust, detailed assessments have been undertaken in Chapter 6: Air Quality, Chapter 12: Noise and Chapter 14: Traffic and Transport of the ES (document reference TR020002/APP/5.2-1 – 5.2-2). The negative effects on tourism are commonly observed to be related to noise and traffic.</p> <p>The effects of noise on tourist businesses will be minimal as the increase in urban areas will be small compared to existing sources. Aircraft noise will increase at the main beach in the centre of Ramsgate which is already subject to urban noise but there will be no noticeable noise increases at any other Kent beaches.</p> <p>Outside these areas the effects will depend on existing background levels but in general are considered sufficiently low not to affect the level of business activity or value. The site is well connected by road and rail and traffic increases are assessed to be minimal. The effects of traffic on tourism are considered to be low and will not affect the level of business activity or value.</p>
BHLF-M3TP-EBQT-G	12 June 2017	Does not cover or include Manston near Ramsgate as part of its statutory water undertaking and so no comments at this stage.	N	RiverOak notes this comment and thanks Affinity Water for responding to the consultation.
BHLF-M3TP-EBTC-2	12 June 2017	Strongly objects to proposals.	N	RiverOak notes this response although it disagrees.
		Will bring unacceptable levels of noise and air pollution to local area and greater congestion to the local road network.	N	The air quality effects resulting from the Proposed Development have been assessed in Chapter 6: Air Quality of the ES (document reference TR020002/APP/5.2-1). The assessment shows that air quality will remain comfortably within legal limits. These legal limits are themselves based on World Health

				<p>Organization guidance on health effects, allowing for the most vulnerable members of society. The air quality impacts of the airport are small and confined to the vicinity of the airfield and certain major roads. The impact of air quality on wildlife, ecosystems and biodiversity is assessed in Chapter 7: Biodiversity of the ES (document reference TR020002/APP/5.2-1).</p> <p>The potential noise effects resulting from the Proposed Development have been assessed in Chapter 12: Noise of the ES (document reference TR020002/APP/5.2-1). A summary of the significant residual effects is provided at Section 12.10. Based on this assessment, RiverOak has developed a Noise Mitigation Plan to reduce noise effects (document reference TR020002/APP/2.4). The impact of noise on wildlife, ecosystems and biodiversity is assessed in Chapter 7: Biodiversity of the ES (document reference TR020002/APP/5.2-1).</p> <p>The proposals include improvements to road junctions where these would become congested due to the Proposed Development.</p>
		Need absolute prohibition on night flights	N	<p>RiverOak is proposing a night time policy which imposes movement limits combined with measures to reduce noise. Further information can be found in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4).</p>
		Scheme will have detrimental impact on local residents' health and affects children's ability to learn at school.	N	<p>The Health Impact Assessment (Appendix 15.1) and Chapter 15 of the ES (document reference TR020002/APP/5.2-13 and 5.2-2, respectively) have assessed potential effects and proposed mitigation. The Noise Mitigation Plan (document reference TR020002/APP/2.4) specifies that reasonable levels of noise</p>

				insulation and ventilation for schools within the 60 dB L _{Aeq} (16 hour) day time contour will be provided.
BHLF-M3TP-EBB5-2	12 June 2017	Strongly objects to proposals.	N	RiverOak notes this response although it disagrees.
		Does not consider that there is a realistic business case for reopening the airport.	N	The Azimuth Report (document reference TR020002/APP/7.4) provides a detailed case for the reopening of the airport. It is clear that the UK needs additional airport capacity. The evidence shows that air freight is particularly vulnerable to capacity constraints not only in the UK but also in Europe (see the Schiphol Airport example). Manston Airport zoned for aviation use, can provide some of the much-needed capacity almost immediately. RiverOak's planned investment in the airport would provide state-of-the-art facilities for freight, addressing many of the current difficulties experienced by freighter operators.
		Believes that the proposals will stall the strong resurgence of the tourism industry in East Kent.	N	The effects on tourism are discussed within Chapter 13: Socio-Economics of the ES (document reference TR020002/APP/5.2-2). Tourism receptors in the vicinity of the Proposed Development may experience effects resulting from the increased activity in the geographical area, in both construction and operational phases. For tourism businesses within the surrounding area, the increased visitor numbers associated with the airport operation, in conjunction with increased incomes from employees at Manston, will likely lead to increased demand for tourism facilities and associated spending in the locality. This could result in improvements to their volume of trade. In terms of indirect impacts, such as increased traffic, noise or dust, detailed assessments have been undertaken in Chapter 6: Air Quality, Chapter 12: Noise and Chapter 14: Traffic and Transport of the ES (document reference TR020002/APP/5.2-1

				<p>– 5.2-2). The negative effects on tourism are commonly observed to be related to noise and traffic.</p> <p>The effects of noise on tourist businesses will be minimal as the increase in urban areas will be small compared to existing sources. Aircraft noise will increase at the main beach in the centre of Ramsgate which is already subject to urban noise but there will be no noticeable noise increases at any other Kent beaches.</p> <p>Outside these areas the effects will depend on existing background levels but in general are considered sufficiently low not to affect the level of business activity or value. The site is well connected by road and rail and traffic increases are assessed to be minimal. The effects of traffic on tourism are considered to be low and will not affect the level of business activity or value.</p>
		<p>Very concerned about increased air pollution and the adverse effect of flights (in particular night flights) on local residents' health. Specifically concerned about flights causing acute anxiety in local residents.</p>	N	<p>The Health Impact Assessment, Appendix 15.1 of the ES (document reference TR020002/APP/5.2-13) assesses the potential health impacts associated with changes in noise and air pollution. Where adverse effects are predicted, measures to mitigate these are set out in the Chapter 15 of the ES (document reference TR020002/APP/5.2-2) and the Noise Mitigation Plan (document reference TR020002/APP/2.4).</p> <p>RiverOak is proposing a night time policy which imposes movement limits combined with measures to reduce noise. Further information can be found in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4).</p>

		Notes that they purchased their property on the basis of the existing s106 agreement which prohibited night flights and that the proposed scheme would breach human rights.	N	RiverOak will comply with the national compensation code for any loss in market value of properties arising from the construction or operation of the Proposed Development. On that basis, the proposals do not breach human rights considerations.
		Proposal would detrimentally affect heritage and beauty of the area.	N	Changes to landscape character and views are assessed in the Landscape and Visual Impact Assessment which is reported in Chapter 11 of the ES (document reference TR020002/APP/5.2-2). Impacts on heritage assets have been assessed and are reported in Chapter 9: Historic Environment of the ES (document reference TR020002/APP/5.2-1). The assessment process has been undertaken in line with relevant policies and legislative requirements (see Section 9.2 of Chapter 9: Historic Environment) and appropriate mitigation measures are proposed in Sections 9.8-9.10 of Chapter 9: Historic Environment.
BHLF-M3TP-EBT7-P	12 June 2017	Supportive of proposals in principle, as they will help to rejuvenate surrounding area.	N	RiverOak notes and welcomes this response.
		Proposed Development must be sympathetic to development plans for residential development at the nearby Manston Green site and to any future housing proposals required to meet TDC's housing need.	Y	RiverOak notes this point. If the DCO is granted, TDC's new Local Plan will need to include the consented development proposals as part of its strategic plan. Any future housing allocations/sites will need to be selected in light of the consented airport development.
		Improvements to highway network proposed by the Manston Green development plans	N	The Transport Assessment (document reference TR020002/APP/5.2-15) identifies a package of mitigation measures that are appropriate for the development proposals.

		should be considered as part of RiverOak's package of mitigation measures.		
		Need further noise assessment against which CL can determine noise impacts on its Manston Green development plans.	Y	Manston Green is included as a receptor location for the noise assessment reported on in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) and a summary of potential future noise effects upon Manston Green is presented at section 12.9 of that Chapter.
		Need to include provision for ongoing monitoring of the effects of air quality and that controls are in place to ensure that emission levels do not exceed an acceptable level.	Y	RiverOak has agreed to fund the reinstatement of the monitoring station downwind of the airport (ZH3 Thanet Airport). The monitoring station was decommissioned in 2016 and therefore needs to be re-instated.
		Need to include provision for ongoing monitoring of the effects on biodiversity in the area surrounding the airport to ensure that no negative impacts arise.	Y	Chapter 7: Biodiversity of the ES (document reference TR020002/APP/5.2-1) includes details of proposed post-consent monitoring for biodiversity receptors. Requirements 9 and 13 of the DCO (document reference TR020002/APP/2.1) contain commitments related to ecological mitigation and protected species.
		Consider that RiverOak need to undertake further technical work and then carry out further consultation.	Y	RiverOak and its consultants undertook further work and another statutory consultation was held between 12 January and 16 February 2018.
BHLF-M3TP-E81Q-3	12 June 2017	Strongly objects to proposals.	N	RiverOak notes this response although it disagrees.
		Very weak business case for reopening airport.	N	The Azimuth Report (document reference TR020002/APP/7.4) provides a detailed case for the reopening of the airport. It is clear that the UK needs additional airport capacity. The evidence shows that air freight is particularly vulnerable to capacity constraints not

				only in the UK but also in Europe (see the Schiphol Airport example). Manston Airport zoned for aviation use, can provide some of the much-needed capacity almost immediately. RiverOak's planned investment in the airport would provide state-of-the-art facilities for freight, addressing many of the current difficulties experienced by freighter operators.
		Environmental impact from noise and pollution will be devastating.	N	<p>The air quality effects resulting from the Proposed Development have been assessed in Chapter 6: Air Quality of the ES (document reference TR020002/APP/5.2-1). The assessment shows that air quality will remain comfortably within legal limits. These legal limits are themselves based on World Health Organization guidance on health effects, allowing for the most vulnerable members of society. The air quality impacts of the airport are small and confined to the vicinity of the airfield and certain major roads. The impact of air quality on wildlife, ecosystems and biodiversity is assessed in Chapter 7: Biodiversity of the ES (document reference TR020002/APP/5.2-1) and is shown to be not significant.</p> <p>The potential noise effects resulting from the Proposed Development have been assessed in Chapter 12: Noise of the ES (document reference TR020002/APP/5.2-1). A summary of the significant residual effects is provided at Section 12.10. Based on this assessment, RiverOak has developed a Noise Mitigation Plan to reduce noise effects (document reference TR020002/APP/2.4). The impact of noise on wildlife, ecosystems and biodiversity is assessed in Chapter 7: Biodiversity of the ES (document reference TR020002/APP/5.2-1).</p>
		Tourism to East Kent will be destroyed with planes flying into Manston at all hours.	N	The effects on tourism are discussed within Chapter 13: Socio-Economics of the ES (document reference TR020002/APP/5.2-

				<p>2). Tourism receptors in the vicinity of the Proposed Development may experience effects resulting from the increased activity in the geographical area, in both construction and operational phases. For tourism businesses within the surrounding area, the increased visitor numbers associated with the airport operation, in conjunction with increased incomes from employees at Manston, will likely lead to increased demand for tourism facilities and associated spending in the locality. This could result in improvements to their volume of trade.</p> <p>In terms of indirect impacts, such as increased traffic, noise or dust, detailed assessments have been undertaken in Chapter 6: Air Quality, Chapter 12: Noise and Chapter 14: Traffic and Transport of the ES (document reference TR020002/APP/5.2-1 – 5.2-2). The negative effects on tourism are commonly observed to be related to noise and traffic.</p> <p>The effects of noise on tourist businesses will be minimal as the increase in urban areas will be small compared to existing sources. Aircraft noise will increase at the main beach in the centre of Ramsgate which is already subject to urban noise but there will be no noticeable noise increases at any other Kent beaches.</p> <p>Outside these areas the effects will depend on existing background levels but in general are considered sufficiently low not to affect the level of business activity or value. The site is well connected by road and rail and traffic increases are assessed to be minimal. The effects of traffic on tourism are considered to be low and will not affect the level of business activity or value.</p>
		Adverse effects of night flights on local residents' health (in particular anxiety) will	N	The Health Impact Assessment, Appendix 15.1 of the ES (document reference TR020002/APP/5.2-13) assesses the

		have long reaching health costs for local community.		<p>potential health impacts associated with changes in noise and air pollution. Where adverse effects are predicted, measures to mitigate these are set out in the Noise Mitigation Plan (document reference TR020002/APP/2.4).</p> <p>RiverOak is proposing a night time policy which imposes movement limits combined with measures to reduce noise. Further information can be found in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4).</p>
		Notes that they purchased their property on the basis of the existing s106 agreement which prohibited night flights and that the proposed scheme would breach human rights	N	RiverOak will comply with the national compensation code for any loss in market value of properties arising from the construction or operation of the Proposed Development. On that basis, the proposals do not breach human rights considerations.
BHLF-M3TP-E8PS-4		Strongly supports proposals.	N	RiverOak notes and welcomes this response.
		Notes that although there will be disruption caused by the proposals the local population must accept this to ensure Manston can be a viable hub.	N	RiverOak notes and welcomes this response.
		Any support for the museums would be welcome.	N	An area of approximately 3ha has been safeguarded in the DCO application for operation of the RAF Manston History Museum, Spitfire & Hurricane Memorial Museum and memorial garden. This area encompasses the current museum and memorial grounds and allows for additional areas in which the museums could be expanded or relocated. A decision on whether to proceed with any relocation works will only be made after consultation with the museum operators to ensure that the

				museums' needs are reflected. A preliminary meeting was held between RiverOak and the museums on the 26 March 2018.
BHLF-M3TP-EB15-H	12 June 2017	Strongly objects to proposals.	N	RiverOak notes this response although it disagrees.
		Noise pollution, air pollution and congestion to local road network will be a great detriment to the area, the health of residents and will hold back local children at school.	N	<p>The air quality effects resulting from the Proposed Development have been assessed in Chapter 6: Air Quality of the ES (document reference TR020002/APP/5.2-1). The assessment shows that air quality will remain comfortably within legal limits. These legal limits are themselves based on World Health Organization guidance on health effects, allowing for the most vulnerable members of society. The air quality impacts of the airport are small and confined to the vicinity of the airfield and certain major roads. The impact of air quality on wildlife, ecosystems and biodiversity is assessed in Chapter 7: Biodiversity of the ES (document reference TR020002/APP/5.2-1) and is shown to be not significant.</p> <p>The potential noise effects resulting from the Proposed Development have been assessed in Chapter 12: Noise of the ES (document reference TR020002/APP/5.2-1). A summary of the significant residual effects is provided at Section 12.10. Based on this assessment, RiverOak has developed a Noise Mitigation Plan to reduce noise effects (document reference TR020002/APP/2.4). The impact of noise on wildlife, ecosystems and biodiversity is assessed in Chapter 7: Biodiversity of the ES (document reference TR020002/APP/5.2-1).</p> <p>The Health Impact Assessment, Appendix 15.1 of the ES (document reference TR020002/APP/5.2-13) and Chapter 15 of the ES (document reference TR020002/5.2-2) assesses the potential health impacts associated with changes in noise and air pollution. Where adverse effects are predicted, measures to</p>

				mitigate these are set out in the Noise Mitigation Plan (document reference TR020002/APP/2.4). The Noise Mitigation Plan specifies that reasonable levels of noise insulation and ventilation for schools within the 60 dB L _{Aeq} (16 hour) day time contour will be provided.
		Need an absolute prohibition on night flights.	N	RiverOak is proposing a night time policy which imposes movement limits combined with measures to reduce noise. Further information can be found in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4).
BHLF-M3TP- EBB9-6	12 June 2017	Strongly opposed to proposals.	N	RiverOak notes this response although it disagrees.
		Will bring noise and air pollution to the area, as well as congestion to local road network.	N	<p>The air quality effects resulting from the Proposed Development have been assessed in Chapter 6: Air Quality of the ES (document reference TR020002/APP/5.2-1). The assessment shows that air quality will remain comfortably within legal limits. These legal limits are themselves based on World Health Organization guidance on health effects, allowing for the most vulnerable members of society. The air quality impacts of the airport are small and confined to the vicinity of the airfield and certain major roads. The impact of air quality on wildlife, ecosystems and biodiversity is assessed in Chapter 7: Biodiversity of the ES (document reference TR020002/APP/5.2-1) and is shown to be not significant.</p> <p>The potential noise effects resulting from the Proposed Development have been assessed in Chapter 12: Noise of the ES (document reference TR020002/APP/5.2-1). A summary of the significant residual effects is provided at Section 12.10. Based on this assessment, RiverOak has developed a Noise Mitigation Plan to reduce noise effects (document reference</p>

				<p>TR020002/APP/2.4). The impact of noise on wildlife, ecosystems and biodiversity is assessed in Chapter 7: Biodiversity of the ES (document reference TR020002/APP/5.2-1).</p> <p>Junctions that are assessed as being affected by the proposals will be improved.</p>
		Does not want any night flights or day flights.	N	RiverOak notes this response although it disagrees.
		Danger of heavy cargo aircraft flying over a densely populated area is not justified.	N	Aircraft incidents are assessed in Chapter 17: Major Accidents and Disasters of the ES (document reference TR020002/APP/5.2-3) where appropriate proposed mitigation is also outlined.
		Proposals will be detrimental to the health of local residents and will hold local children back at school, particularly because of interruptions that it will cause to sleep patterns.	N	The Health Impact Assessment, Appendix 15.1 of the ES (document reference TR020002/APP/5.2-13) and Chapter 15 of the ES (document reference TR020002/5.2-2) assesses the potential health impacts associated with changes in noise and air pollution. Where adverse effects are predicted, measures to mitigate these are set out in the Noise Mitigation Plan (document reference TR020002/APP/2.4). The Noise Mitigation Plan specifies that reasonable levels of noise insulation and ventilation for schools within the 60 dB L _{Aeq} (16 hour) day time contour will be provided.
BHLF-M3TP-EBT9-R	12 June 2017	Scope of ES should be updated and extended to reflect all schemes within the zones of influence (including the strategic housing site at Birchington) included in the emerging Local Plan.	Y	The scope of the ES (document reference TR020002/APP/5.2) has taken into account all relevant schemes as so far as the outcomes of the local plan are known at the time of writing. This can be located within Chapter 18: Cumulative Effects Assessment of the ES (document reference TR020002/APP/5.2-3).

		Proposals need to be included for improvements to the strategic road network as detailed in the draft Local Plan.	Y	<p>The Transport Assessment (document reference TR020002/APP/5.2-15) identifies a package of mitigation measures that are appropriate for the development proposals.</p> <p>A sensitivity test has been included in the Transport Assessment, considering the proposals of the draft local plan however this is provided as narrative only and as set out in the Transport Assessment with the status of the local plan now in doubt this is provided for the purpose of KCC reviewing the impact on any future highways proposals that may eventually end up in an approved Local Transport Plan.</p>
BHLF-M3TP-EBTV-N	12 June 2017	ES to be prepared in conjunction with the DCO should be updated to include all permitted Proposed Developments and the emerging sites within the Preferred Options (January 2015) and the Proposed Revisions to the Local Plan (January 2017).	Y	This has been done in the case of developments that have been permitted, although the rejection of the local plan in January 2018 means that less weight should be given to the sites emerging within that plan.
		Environmental Impact Assessment which accompanies the DCO application should include the new strategic routes proposed within the Local Plan by Thanet and Kent Councils.	Y	The Transport Assessment (document reference TR020002/APP/5.2-15) identifies a package of mitigation measures that are appropriate for the development proposals.
		The Proposed Development will need to contribute to the proposed road network in the Thanet Local Plan.	N	For junctions adjacent to the site, the Proposed Development includes improvements as part of the project; for more remote junctions these will be improved via a contribution to Kent County Council and the conclusion of s278 agreements.

BHLF-M3TP-EBT5-M	12 June 2017	Do not consider that consultation materials disclose sufficient evidence of RiverOak's ability to fund the Proposed Development.	Y	The consultation materials provided satisfy the requirements of the relevant regulations – there is no requirement for consultation materials to provide any evidence of funding ability. A Funding Statement (document reference TR020002/APP/3.2) does, however, form part of the DCO application.
		Outline Business Case and Suggested Market Opportunity are inadequate, fundamentally flawed and not credible.	N	The Azimuth Report (document reference TR020002/APP/7.4) provides a detailed case for the reopening of the airport. It is clear that the UK needs additional airport capacity. The evidence shows that air freight is particularly vulnerable to capacity constraints not only in the UK but also in Europe (see the Schiphol Airport example). Manston Airport zoned for aviation use, can provide some of the much-needed capacity almost immediately. RiverOak's planned investment in the airport would provide state-of-the-art facilities for freight, addressing many of the current difficulties experienced by freighter operators.
		RiverOak do not own the land that it proposes to develop and does not present a credible means of acquisition. No detail is provided in terms of which specific CPO powers are to be used for the compulsory acquisition of the land or the proposed grounds to justify a CPO. Consultee does not believe that there is a case for the granting of CPO powers.	Y	The Statement of Reasons (document reference TR020002/APP/3.1) sets out RiverOak's case for compulsory acquisition.
		Level of detail provided in the Preliminary Environmental Impact Report is inadequate to reach even a preliminary view on the likely environmental effects of the Proposed	Y	The 2017 PEIR reflected the available environmental information at the time and RiverOak considers it contained an appropriate level of detail. More detailed information is now provided in the ES (document reference TR020002/APP/5.2).

		Development, or the scope of mitigation necessary to make it acceptable.		
		There is no evidence to demonstrate a genuine ability or intention to deliver the Proposed Development.	Y	This response is without foundation and not relevant to the terms of the consultation. The further work put in by RiverOak since the 2017 consultation demonstrates this.
		Consultation with the current owner of the site and other statutory consultees has been inadequate.	N	The owners of the site were consulted during each of the three stages of consultation as were all other appropriate statutory consultees. For stages 2 and 3 consultation, the site owners were sent a statutory consultation pack in the post and responses were received which have been considered in formulating the proposals for the Proposed Development.
BHLF-M3TP-EB2R-F	12 June 2017	Concerned by prospect of increased traffic on Spitfire Way. Junction with Alland Grange Lane is particularly dangerous as sight lines are poor in both directions. A junction improvement scheme or roundabout scheme at this location should be incorporated within the proposals.	N	The accident issues at this junction have been observed within the accident data provided by KCC and mitigation has been proposed at this junction as well as Spitfire Way being widened to 7.3m. The details of this are set out in the Transport Assessment (document reference TR020002/APP/5.2-15) The improvement scheme at this junction itself will be secured through agreements pursuant to section 278 of the Highways Act 1980.
BHLF-M3TP-EB95-S	12 June 2017	Strongly objects to proposals.	N	RiverOak notes this response although it disagrees.
		The business case for reopening the airport is weak.	N	The Azimuth Report (document reference TR020002/APP/7.4) provides a detailed case for the reopening of the airport. It is clear that the UK needs additional airport capacity. The evidence shows that air freight is particularly vulnerable to capacity constraints not only in the UK but also in Europe (see the Schiphol Airport example). Manston Airport zoned for aviation use, can provide some of the much-needed capacity almost immediately. RiverOak's planned investment in the airport would provide state-

				of-the-art facilities for freight, addressing many of the current difficulties experienced by freighter operators.
		Night flights are a major concern and should be prohibited.	N	RiverOak is proposing a night time policy which imposes movement limits combined with measures to reduce noise. Further information can be found in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4).
		Residents' health and sleep will be adversely affected by noise and air pollution.	N	The Health Impact Assessment, Appendix 15.1 of the ES (document reference TR020002/APP/5.2-13) assesses the potential health impacts associated with changes in noise and air pollution. No significant adverse impacts are predicted as a result of changes in air quality. Where adverse noise effects are predicted, measures to mitigate these are set out in the Noise Mitigation Plan (document reference TR020002/APP/2.4).
BHLF-M3TP-EBTM-C	12 June 2017	Airport must be capable of being operated safely with existing environment including in relation to operational and proposed offshore wind farms. In particular: (1) Primary Surveillance Radar where proposed for Manston Airport must be capable of mitigating operational effects on wind turbines at Thanet Offshore Wind Farm, Kentish Flats Offshore Wind Farm and proposed turbines at Thanet Extension Offshore Wind Farm in the safe provision of an air traffic service; (2) Flight procedures used on approach to and departure from Manston Airport must	N	RiverOak has had two meetings with Vattenfall and the parties have jointly agreed to develop a statement of common ground with regard to the Vattenfall project and Manston Proposed Development.

		<p>also be compatible with, and designed to take into account, the presence of existing operational turbines and those proposed at Thanet Extension Offshore Wind Farm.</p> <p>Would expect these matters to be secured through a requirement in the DCO or similar mechanism.</p>		
BHLF-M3TP-E88Z-K	12 June 2017	Generally supportive of the proposals.	N	RiverOak notes and welcomes this response.
		Encourages greater passenger destination choice.	N	Passenger destinations will be short haul to Europe. The intention is for a low-cost carrier to base a small number of aircraft at Manston. The carrier will decide the destinations based on passenger demand. A double daily connection to a major European hub airport offering global connections is also proposed.
		Need prohibition on night flights in order to minimise noise impact on local residents and the bird sanctuary at Pegwell Bay. Notes that if Proposed Development cannot be economically viable without night flights, it should not proceed.	Y	RiverOak is proposing a night time policy which imposes movement limits combined with measures to reduce noise. Further information can be found in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4).
BHLF-M3TP-E8H8-1	12 June 2017	Strongly supports proposals and notes that the sooner the airport opens the better.	N	RiverOak notes and welcomes this response.
		Need to incorporate both museums into one building and lease out at a fair rent.	N	An area of approximately 3ha has been safeguarded in the DCO application for operation of the RAF Manston History Museum, Spitfire & Hurricane Memorial Museum and memorial garden. This area encompasses the current museum and memorial grounds and allows for additional areas in which the

				museums could be expanded or relocated. A decision on whether to proceed with any relocation works will only be made after consultation with the museum operators to ensure that the museums' needs are reflected. A preliminary meeting was held between RiverOak and the museums on the 26 March 2018.
		Does not want night flights between 11 pm and 6 am.	N	RiverOak is proposing a night time policy which imposes movement limits combined with measures to reduce noise. Further information can be found in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4).
BHLF-M3TP-EFH4-B	12 June 2017	Outline Business Case too big and too commercial.	N	Airport business cases are necessarily detailed and commercial. Since the 1986 Airports Act, the UK's airports have been privatised and are therefore commercial entities. It is important to provide the level of detail provided in the Azimuth Report (document reference TR020002/APP/7.4 to inform the DCO process and stakeholders.
		Existing road network in proximity to the airport insufficient to support increased traffic flows.	N	The Transport Assessment (document reference TR020002/APP/5.2-15) sets out the results of a capacity assessment on the local road network for links and junctions. Where it has been found that local roads cannot accommodate the predicted levels of traffic, mitigation schemes have been proposed. Further details are set out in Chapter 7 of the Transport Assessment.
		Increase in noise pollution a major concern.	N	The potential noise effects resulting from the Proposed Development have been assessed in Chapter 12: Noise of the ES (document reference TR020002/APP/5.2-1). A summary of the significant residual effects is provided at Section 12.10. Based on this assessment, RiverOak has developed a Noise Mitigation Plan

				to reduce noise effects (document reference TR020002/APP/2.4). The impact of noise on wildlife, ecosystems and biodiversity is assessed in Chapter 7: Biodiversity of the ES (document reference TR020002/APP/5.2-1).
		Need prohibition on night flights.	Y	RiverOak is proposing a night time policy which imposes movement limits combined with measures to reduce noise. Further information can be found in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4).
		RAF Manston and Hurricane and Spitfire museums do not require further enhancement as proposed and are functioning well.	N	An area of approximately 3ha has been safeguarded in the DCO application for operation of the RAF Manston History Museum, Spitfire & Hurricane Memorial Museum and memorial garden. This area encompasses the current museum and memorial grounds and allows for additional areas in which the museums could be expanded or relocated. A decision on whether to proceed with any relocation works will only be made after consultation with the museum operators to ensure that the museums' needs are reflected. A preliminary meeting was held between RiverOak and the museums on the 26 March 2018.
		Proximity of the 'Northern Grass' development proposals to residents living alongside the airfield is a major concern. Suggests that only radar equipment should be on this land.	N	The design of the Proposed Development (including the Northern Grass airport related business development, has evolved through an iterative process of dialogue between the environmental assessment and Proposed Development design teams. An assessment of the visual effects likely to be experienced by local residents as a result of the Proposed Development, including the Northern Grass development, is included at section 11.9 of Chapter 11: Landscape and Visual, of the ES (document reference TR020002/APP/5.2-2). The visual effects identified as

				requiring mitigation and the resultant measures incorporated into the design are set out in Table 11.11 of that Chapter.
		Structures proposed to be erected as part of the 'Northern Grass' development will have significant detrimental visual impact.	N	As stated above, the design of the Proposed Development (including the Northern Grass airport related business development, has evolved through an iterative process of dialogue between the environmental assessment and Proposed Development design teams. An assessment of the visual effects likely to be experienced, including the Northern Grass development, is included at section 11.9 of Chapter 11: Landscape and Visual, of the ES (document reference TR020002/APP/5.2-2). The visual effects identified as requiring mitigation and the resultant measures incorporated into the design are set out in Table 11.11 of that Chapter
		Proposals will cause property around the airfield to drop in value.	N	RiverOak do not believe this to be the case, but if they do then it will abide by the national compensation code and compensate landowners under its terms.
		Detrimental impact of the Proposed Development on the local environment likely to be significant and outweighs any corresponding benefits.	N	An assessment of the likely significant effects resulting from the Proposed Development, alongside any perceived benefits are outlined upon a topic by topic basis within the technical Chapters of the ES (document reference TR020002/APP/ 5.2).
BHLF-M3TP-EFM9-N	12 June 2017	Strongly supports proposals.	N	RiverOak notes and welcomes this response.
		Construction and operation of Proposed Development must minimise air pollution as much as possible.	Y	Details of various measures to minimise air pollution during the construction phase are included in the CEMP, Appendix 3.2 of the ES (document reference TR020002/APP/5.2-6). Measures to minimise air pollution during operation will include the use of electric plant and vehicles airside, airfield design which minimises the time aircraft spend on the ground and locates stand

				areas in the centre of the airfield away from sensitive receptors, and controls on Auxiliary Power Unit usage.
		Proposed development must include appropriate enhancements to local road network and provision for sufficient parking.	Y	The Masterplan (document reference TR020002/APP/7.1) sets out proposed car parking and is supported by Appendix N of the Transport Assessment (document reference TR020002/APP/5.2-25) – the Car Park Management Strategy. The Transport Assessment sets out a detailed safety and capacity assessment of the key local road junctions and provides (Chapter 7 of the Transport Assessment) for mitigation where required.
		There should not be an uncontrolled number of night flights.	Y	RiverOak is proposing a night time policy which imposes movement limits combined with measures to reduce noise. Further information can be found in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4).
		Development proposals should aim to encourage tourism and support for the historical heritage of the airport.	N	A dedicated museum area safeguarding the existing museums is included in the proposed masterplan (document reference TR020002/APP/7.1). Further survey and investigations will further define and assess heritage assets on the site. These will inform the final design and will includes appropriate mitigation measures for the avoidance of highly significant heritage assets.
		Proposals should secure medium to long-term financial stability of the RAF Manston and Hurricane and Spitfire museums, for example by granting a lease to the operator at a nominal rent.	N	RiverOak met the operators of the Hurricane and Spitfire Museum on 26 March 2018. The proposed masterplan includes an area safeguarded for the museums - this area encompasses the current museum and memorial grounds and allows for additional areas in which the museums could be expanded or relocated. A decision on whether to proceed with any relocation works will only be made after consultation with the museum operators to ensure

				that the museums' needs are reflected. (document reference TR020002/APP/7.1)
BHLF-M3TP-EFEH-V	12 June 2017	Strongly objects to proposals.	N	RiverOak notes this response although it disagrees.
		Increased noise and air pollution are major concerns.	N	<p>The air quality effects resulting from the Proposed Development have been assessed in Chapter 6: Air Quality of the ES (document reference TR020002/APP/5.2-1). The assessment shows that air quality will remain comfortably within legal limits. These legal limits are themselves based on World Health Organization guidance on health effects, allowing for the most vulnerable members of society. The air quality impacts of the airport are small and confined to the vicinity of the airfield and certain major roads. The impact of air quality on wildlife, ecosystems and biodiversity is assessed in Chapter 7: Biodiversity of the ES (document reference TR020002/APP/5.2-1) and is shown to be not significant.</p> <p>The potential noise effects resulting from the Proposed Development have been assessed in Chapter 12: Noise of the ES (document reference TR020002/APP/5.2-1). A summary of the significant residual effects is provided at Section 12.10. Based on this assessment, RiverOak has developed a Noise Mitigation Plan to reduce noise effects (document reference TR020002/APP/2.4). The impact of noise on wildlife, ecosystems and biodiversity is assessed in Chapter 7: Biodiversity of the ES (document reference TR020002/APP/5.2-1).</p>
		Need limit on flights and absolute prohibition on night flights. Believe they will be forced to move due to lack of sleep caused by night flights.	Y	RiverOak is proposing a night time policy which imposes movement limits combined with measures to reduce noise. Further information can be found in Chapter 12 of the ES

				(document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4).
		Existing road network in proximity to the airport insufficient to support increased traffic flows.	Y	The Transport Assessment (document reference TR020002/APP/5.2-15) sets out the results of a capacity assessment on the local road network for links and junctions. Where it has been found that local roads cannot accommodate the predicted levels of traffic, junction improvements are proposed as part of the development and mitigation schemes have been proposed within the Transport Assessment.
BHLF-M3TP- EF3Y-U	12 June 2017	Strongly objects to proposals.	N	RiverOak notes this response although it disagrees.
		Does not consider that there is a sound business case for reopening the airport. There are better alternative uses that could be made of the site. Considers that more housing is needed in the area.	N	As of January 2018, the Manston Airport site is no longer being promoted as a mixed use settlement for up to 2,500 new homes in the new draft Thanet Local Plan. Thanet District Council launched a 'Call For Sites' in February 2018 which invites anyone to submit details of a site that they consider suitable for development. This could include sites suitable for housing development which have not yet been considered by the Council that could absorb the 2,500 houses previously allocated at the airport. The Manston site is zoned for aviation use and reopening the airport will provide much needed employment opportunities in an area of relatively high deprivation. The Azimuth Report (document reference TR020002/APP/7.4) provides details of the case for reopening the airport in some depth and finds that there are no other airports that can be used to reduce the impact of UK airport capacity constraints on the freight market.
		Believes that improvements to museum will be costly and would question their viability on that basis.	N	An area of approximately 3ha has been safeguarded in the DCO application for operation of the RAF Manston History Museum, Spitfire & Hurricane Memorial Museum and memorial

				garden. This area encompasses the current museum and memorial grounds and allows for additional areas in which the museums could be expanded or relocated. A decision on whether to proceed with any relocation works will only be made after consultation with the museum operators to ensure that the museums' needs are reflected. A preliminary meeting was held between RiverOak and the museums on the 26 March 2018.
		Need an absolute prohibition on night flights as a minimum.	Y	RiverOak is proposing a night time policy which imposes movement limits combined with measures to reduce noise. Further information can be found in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4).
ANON-M3TP-EFU8-V	12 June 2017	Strongly supports proposals. South East crying out for airport capacity and could fill this gap in the market. Business plan makes sense.	N	RiverOak notes and welcomes this response.
		Proposed location of warehouses should be revised to enhance visual impact on visitors to site.	N	The design of the Proposed Development (including the location of warehouses) has evolved through an iterative process of dialogue between the environmental assessment and Proposed Development design teams. An assessment of the visual effects likely to be experienced, including the Northern Grass development, is included at section 11.9 of Chapter 11: Landscape and Visual, of the ES (document reference TR020002/APP/5.2-2). The visual effects identified as requiring mitigation and the resultant measures incorporated into the design are set out in Table 11.11 of Chapter 11.
		Proposed development should incorporate aircraft viewing area, potentially by using the	N	This will be considered although the Northern grass is probably too far away.

		existing tower located on the 'Northern Grass'.		
		Noise associated with operational activities on airport site (e.g. loading vehicles, aircraft generators) is a concern. Need to incorporate underground power sources at all aircraft parking stands wherever possible in order to minimise generator noise.	Y	<p>The design of the Proposed Development includes a provision for all stands to be served by Fixed Electrical Ground Power (FEGP) which will reduce the need for aircraft APU and external Ground Power Units (GPU), which will reduce noise from operational activities.</p> <p>The potential noise effects resulting from the Proposed Development have been assessed in Chapter 12: Noise of the ES (document reference TR020002/APP/5.2-1). A summary of the significant residual effects is provided at Section 12.10. Based on this assessment, RiverOak has developed a Noise Mitigation Plan to reduce noise effects (document reference TR020002/APP/2.4). The impact of noise on wildlife, ecosystems and biodiversity is assessed in Chapter 7: Biodiversity of the ES (document reference TR020002/APP/5.2-1).</p>
		Night flights are a concern and would favour total prohibition. If included, should ensure that aircraft stands used for night flights are located as far away as possible from residential land to minimise ground noise for local residents.	Y	<p>RiverOak is proposing a night time policy which imposes movement limits combined with measures to reduce noise. Further information can be found in Chapter 12 of the ES (ES) (document reference TR020002/APP/5.2-1) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4). The aircraft stands are already some distance from residential properties.</p>
		Proposed gradients surrounding two onsite ponds is a concern.	Y	<p>Proposed ground levels in the vicinity of the ponds have been revised ahead of the DCO application. Around the ponds ground levels have an approximate fall of 2.5% or 1:40. For reference this corresponds to the typical transverse slope of a UK road.</p>

ANON-M3TP- EFZG-G	12 June 2017	Strongly supports proposals.	N	RiverOak notes and welcomes this response.
		Concerned by the proposed timeframe to complete phase 1 of the works. Would support longer working hours to expedite completion.	N	The Applicant's working time proposals are set out in detail in the Construction Environment Management Plan, Appendix 3.2 of the ES document TR020002/APP/5.2-6). During Phase 1, the Proposed Development programme assumes a 6-day working week, with construction generally confined to the hours of 07:30 to 17:30 Monday to Friday and Saturday 7:30 to 13:00. There is no planned working on Sundays or Bank Holidays.
		Would like to see proposals to improve the flow of traffic at Spitfire Junction.	Y	The Transport Assessment (document reference TR020002/APP/15) and Masterplan set out the proposed new signalised junction at the Spitfire Way/Manston Road location and this is part of the Proposed Development.
		An annual air show would benefit the local economy. Would also like to see the airport opened up to local schools for educational purposes.	Y	RiverOak supports air shows in principle but points out that they are not compatible with the operation of a busy airport. Ultimately the decision would lie with the CAA. RiverOak is keen to develop close relations with local schools and colleges and has already been in contact with East Kent College.
		Would like clarification of the timing and frequency of night flights. Would be unhappy with flights between midnight and 5am.	Y	RiverOak is proposing a night time policy which imposes movement limits combined with measures to reduce noise. Further information can be found in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4).
		Need a much larger building to house the RAF Manston and Hurricane and Spitfire museums and further car parking provision.	N	An area of approximately 3ha has been safeguarded in the DCO application for operation of the RAF Manston History Museum, Spitfire & Hurricane Memorial Museum and memorial

				<p>garden. This area encompasses the current museum and memorial grounds and allows for additional areas in which the museums could be expanded or relocated. A decision on whether to proceed with any relocation works will only be made after consultation with the museum operators to ensure that the museums' needs are reflected. A preliminary meeting was held between RiverOak and the museums on the 26 March 2018.</p>
		RAF Manston and Hurricane and Spitfire museums would benefit from subsidies from the airport in order to secure their continued operation.	N	RiverOak recognises the importance of both museums and is very supportive of their continued operation. RiverOak is willing to explore the possibility of contributing to the fundraising necessary to achieve this.
		Would like to know what is proposed in the way of onsite facilities (cafes, restaurants etc.) and transport (e.g. shuttle services) once passenger flights are introduced.	Y	<p>A shuttle bus to Ramsgate, improved pedestrian links and enhanced local bus services are proposed within the Transport Assessment (document reference TR020002/APP/5.2-15), particularly within Appendix L (Travel Plan) and Appendix O (Airport Surface Access Strategy) (document reference TR020002/APP/5.2-25).</p> <p>Cafes, viewing facilities and other amenities are not part of the DCO masterplan but there is scope to review this again at the detailed design stage once critical infrastructure is in place.</p>
BHLF-M3TP- EF3R-M	12 June 2017	Strongly objects to proposals.	N	RiverOak notes this response although it disagrees.
		Does not believe that reopening site is financially viable or economically beneficial to wider community.	N	The Azimuth Report (document reference TR020002/APP/7.4) provides a detailed case for the reopening of the airport. It is clear that the UK needs additional airport capacity. The evidence shows that air freight is particularly vulnerable to capacity constraints not only in the UK but also in Europe (see the Schiphol Airport example). Manston Airport zoned for aviation use, can provide some of the much-needed capacity almost immediately.

				RiverOak's planned investment in the airport would provide state-of-the-art facilities for freight, addressing many of the current difficulties experienced by freighter operators.
		Extremely concerned by the increase in noise and air pollution for those living in close proximity to the airport and its impact on local residents' health, property values and on local wildlife.	N	The Health Impact Assessment, Appendix 15.1 of the ES (document reference TR020002/APP/5.2-13) assesses the potential health impacts associated with changes in noise and air pollution. No significant adverse impacts are predicted as a result of changes in air quality and where adverse noise effects are predicted, measures to mitigate these are set out in the Noise Mitigation Plan (document reference TR020002/APP/2.4).
		Does not consider that RAF Manston and Hurricane and Spitfire museums require regeneration and are operating well as they are.	N	An area of approximately 3ha has been safeguarded in the DCO application for operation of the RAF Manston History Museum, Spitfire & Hurricane Memorial Museum and memorial garden. This area encompasses the current museum and memorial grounds and allows for additional areas in which the museums could be expanded or relocated. A decision on whether to proceed with any relocation works will only be made after consultation with the museum operators to ensure that the museums' needs are reflected. A preliminary meeting was held between RiverOak and the museums on the 26 March 2018.
		Strongly opposed to any night flights.	N	RiverOak is proposing a night time policy which imposes movement limits combined with measures to reduce noise. Further information can be found in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4).
		Generally supports proposals.	N	RiverOak notes and welcomes this response.

BHLF-M3TP- EF37-S	12 June 2017	Believes that RAF Manston and Hurricane and Spitfire museums require cash injection.	N	RiverOak is considering a financial contribution to the upkeep of the museums.
		Night flights should be directed over farmland to the rear of the site.	N	RiverOak is proposing a night time policy which imposes movement limits combined with measures to reduce noise. Further information can be found in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4) .
ANON-M3TP- E8CE-9	12 June 2017	Generally supports proposals and notes that the sooner the airport opens the better	N	RiverOak notes and welcomes this response.
		Believes that the airport is essential for the regeneration of Thanet.	N	RiverOak notes and welcomes this response.
		Would like to see a requirement for donation of annual profits from airport operations to support upkeep of museums.	N	As stated above, RiverOak is keen to explore the possibility of contributing to funding improved facilities at both museums. However RiverOak also recognises that both museums are rightly protective of their independence
		Preference for no night flights.	N	RiverOak is proposing a night time policy which imposes movement limits combined with measures to reduce noise. Further information can be found in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4) .
BHLF-M3TP- EFT7-T	12 June 2017	Generally supportive of proposals.	N	RiverOak notes and welcomes this response.
		Would like to see the report of surveys undertaken on storm water drain located on consultee's land.	N	These can be provided on request to the extent that they were carried out for the purposes of environmental assessment.

ANON-M3TP-E82B-N	12 June 2017	Strongly objects to proposals.	N	RiverOak notes this response although it disagrees.
		Will lead to unacceptable levels of air and noise pollution which will have a negative impact on local residents and wildlife.	N	<p>The air quality effects resulting from the Proposed Development have been assessed in Chapter 6: Air Quality of the ES (document reference TR020002/APP/5.2-1). The assessment shows that air quality will remain comfortably within legal limits. These legal limits are themselves based on World Health Organization guidance on health effects, allowing for the most vulnerable members of society. The air quality impacts of the airport are small and confined to the vicinity of the airfield and certain major roads. The impact of air quality on wildlife, ecosystems and biodiversity is assessed in Chapter 7: Biodiversity of the ES (document reference TR020002/APP/5.2-1) and is shown to be not significant.</p> <p>The potential noise effects resulting from the Proposed Development have been assessed in Chapter 12: Noise of the ES (document reference TR020002/APP/5.2-1). A summary of the significant residual effects is provided at Section 12.10. Based on this assessment, RiverOak has developed a Noise Mitigation Plan to reduce noise effects (document reference TR020002/APP/2.4). The impact of noise on wildlife, ecosystems and biodiversity is assessed in Chapter 7: Biodiversity of the ES (document reference TR020002/APP/5.2-1).</p>
		Concern about severe congestion on the local road network.	Y	The Transport Assessment (document reference TR020002/APP/5.2-15) sets out the results of a capacity assessment on the local road network for links and junctions. Where it has been found that local roads cannot accommodate the predicted levels of traffic, mitigation schemes have been proposed.

		Wants to see those impacted in a negative way by the proposed scheme adequately compensated.	Y	RiverOak is minimising aircraft noise through its Noise Mitigation Plan (document reference TR020002/APP/2.4) and will abide by the national compensation code in relation to property compensation. However, it believes that its proposals will bring widespread benefit to the area.
		Suggests people who work at the museums should be consulted about any potential changes to the museums.	Y	No changes to the museums will be proposed without the involvement of their operators.
		Absolute prohibition on night flights is required.	N	RiverOak is proposing a night time policy which imposes movement limits combined with measures to reduce noise. Further information can be found in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4).
BHLF-M3TP-E8F2-S	12 June 2017	Generally supports proposals and believes the scheme is viable and appropriate.	N	RiverOak notes and welcomes this response.
		Need to demonstrate that quieter aircraft can and will operate from the site in order that residents can make informed decision on night flights.	N	Quieter aircraft will be encouraged at the site through the operation of a Quota Count, as proposed in the Noise Mitigation Plan.
		Disappointed that feedback form could not be accessed on an Apple computer.	N	The platform used to host the online feedback form is designed to allow access from all browsers and operating systems, including Apple.
BHLF-M3TP-EBFZ-B	12 June 2017	Strongly supports proposals.	N	RiverOak notes and welcomes this response.
		Generally supports proposals.	N	RiverOak notes and welcomes this response.

BHLF-M3TP-E85B-R	12 June 2017	Concerned by the proximity of fuel farm to residential property at King Arthur Road. Would like further information on size and storage capacity of fuel farm.	N	<p>The fuel farm site will be divided into a landside delivery area, a bunded area for airfield fuel tanks and an airside area for the filling of fuel bowzers and maintenance of the airfield fuel bowser fleet. It is expected that a minimum of three 700,000l cylindrical tanks will be installed as part of the fuel farm. An additional tank has been allowed for to accommodate lighter aircraft fuel used for general aviation aircraft.</p> <p>The new facility will incorporate suitable protection and other measures to control and mitigate any risks to nearby residential and other property from any incident at the fuel farm.</p>
		Concerned about fire training ground and asks whether this will involve the propagation of black clouds of smoke.	Y	There are no longer any plans to develop a live fire training facility at Manston.
		Would like to see limitations on night flights but not necessarily a total prohibition. Noise impact likely to be greater in Ramsgate as sound is tunnelled through buildings.	Y	RiverOak is proposing a night time policy which imposes movement limits combined with measures to reduce noise. Further information can be found in Chapter 12 of the ES (ES) (document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4) .
		Proposals better than alternative uses if it brings more jobs for local people.	N	RiverOak agrees with this comment: an operational airport is likely to provide more job opportunities than any other type of employer.
BHLF-M3TP-EFHZ-H	12 June 2017	Strongly supports proposals.	N	RiverOak notes and welcomes this response.
BHLF-M3TP-EFHR-9	12 June 2017	Generally supports proposals.	N	RiverOak notes and welcomes this response.
		Believes that airport would bring social and economic benefits to Cliffsend.	N	RiverOak agrees with this comment. Should the airport reopen, RiverOak would work to ensure training and education

				opportunities are available to local people, and to ensure social and economic benefits accrue to the people of Thanet.
		Would like to see further enhancement and publicity of Manston and Hurricane and Spitfire museums.	N	A dedicated museum area safeguarding the existing museums and allowing expansion is included in the proposed design (refer to Chapter 3: Description of the Proposed Development of the ES (document reference TR020002/APP/5.2-1)). Survey and investigation during phase 1 (see Chapter 9: Historic Environment, Sections 9.8.5 and 9.9.3) will further define and assess heritage assets on the site. The museums are responsible for publicity, but the development will increase visitors to the airfield.
ANON-M3TP-E82H-U	12 June 2017	Strongly objects to proposals.	N	RiverOak notes this response although it disagrees.
		Does not believe that proposals are supported by a cogent and realistic business case.	N	<p>The Azimuth Report provides a detailed business case, having identified a clear need for additional airport capacity in the South East of the UK. No other airport can provide capacity for air freighters, a market forecast to grow considerably over the next few decades.</p> <p>The Azimuth Report (document reference TR020002/APP/7.4) provides a detailed case for the reopening of the airport. It is clear that the UK needs additional airport capacity. The evidence shows that air freight is particularly vulnerable to capacity constraints not only in the UK but also in Europe (see the Schiphol Airport example). Manston Airport zoned for aviation use, can provide some of the much-needed capacity almost immediately. RiverOak's planned investment in the airport would provide state-of-the-art facilities for freight, addressing many of the current difficulties experienced by freighter operators.</p>

		<p>Disturbance caused by aircraft and increased road traffic would destroy the growing tourism industry in the area and negatively affect local businesses.</p>	<p>N</p>	<p>The effects on tourism are discussed within Chapter 13: Socio-Economics of the ES (document reference TR020002/APP/5.2-2). Tourism receptors in the vicinity of the Proposed Development may experience effects resulting from the increased activity in the geographical area, in both construction and operational phases. For tourism businesses within the surrounding area, the increased visitor numbers associated with the airport operation, in conjunction with increased incomes from employees at Manston, will likely lead to increased demand for tourism facilities and associated spending in the locality. This could result in improvements to their volume of trade.</p> <p>In terms of indirect impacts, such as increased traffic, noise or dust, detailed assessments have been undertaken in Chapter 6: Air Quality, Chapter 12: Noise and Chapter 14: Traffic and Transport of the ES (document reference TR020002/APP/5.2-1 – 5.2-2). The negative effects on tourism are commonly observed to be related to noise and traffic.</p> <p>The effects of noise on tourist businesses will be minimal as the increase in urban areas will be small compared to existing sources. Aircraft noise will increase at the main beach in the centre of Ramsgate which is already subject to urban noise but there will be no noticeable noise increases at any other Kent beaches.</p> <p>Outside these areas the effects will depend on existing background levels but in general are considered sufficiently low not to affect the level of business activity or value. The site is well connected by road and rail and traffic increases are assessed to be minimal. The effects of traffic on tourism are considered to be low and will not affect the level of business activity or value.</p>
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		<p>Predicted employment figures are exaggerated and any new jobs will be cancelled out by the loss of jobs in the tourism sector.</p>	N	<p>The negative effects on tourism are commonly observed to relate to noise and traffic. The effects of noise on tourist businesses will be minimal as the increase in urban areas will be small compared to existing sources. Aircraft noise will increase at the main beach in the centre of Ramsgate which is already subject to urban noise but there will be no noticeable noise increases at any other Kent Beaches. Outside these areas the effects will depend on existing background levels but in general are considered sufficiently low not to affect the level of business activity or value. The site is well connected by road and rail and traffic increases are minimal. The effects of traffic on tourist are considered to be low and will not affect the level of business activity or value.</p> <p>Furthermore, the RPS housing and employment study (Appendix 6 of the Planning Statement (document reference TR020002/APP/7.2)) highlights that little in-migration to Thanet will be required as jobs at Manston will be taken by local people already living in the area. We stand by our estimates of job creation.</p>
		<p>RiverOak should not be involved in the museums.</p>	N	<p>Although an area of approximately 3ha has been safeguarded in the DCO application for operation of the RAF Manston History Museum, Spitfire & Hurricane Memorial Museum and memorial garden RiverOak is not intending to become directly involved with the museum. Rather, it wants to ensure that should the museum wish to expand or relocate they could do so. Any decision on whether to proceed with any relocation works will only be made after consultation with the museum operators to ensure that the museums' needs are reflected. A preliminary meeting was held between RiverOak and the museums on the 26 March 2018.</p>

		Negative impacts of increased noise and air pollution on local residents, in particular their health, have not been addressed to their full extent in the consultation materials.	N	The Health Impact Assessment, Appendix 15.1 of the ES (document reference TR020002/APP/5.2-13) assesses the potential health impacts associated with changes in noise and air pollution. Where adverse effects are predicted, measures to mitigate these are set out in the Noise Mitigation Plan (document reference TR020002/APP/2.4).
		RiverOak have underestimated the area which will be significantly disturbed by the proposals.	N	RiverOak disagrees with this: significant impacts are discussed upon a topic by topic basis within the technical Chapters of the ES (document reference TR020002/APP/5.2-1 – 5.2-3).
		It has not been acknowledged that double-glazing is not effective during hot summers and no account has been taken of the 24 listed properties in the area for which insulation is unsuitable.	N	A noise insulation scheme for residential properties will be offered by the airport authority to help avoid significant adverse effects on health and quality of life. The scheme will take into account both day time and night time noise exposure. Eligibility for the scheme is consistent with current and emerging Government policy. Where, upon application to the airport authority, the freehold owner of a residential property is deemed eligible for assistance under the noise insulation scheme, they will receive £4,000 towards acoustic insulation.
		Provenance of funding is unclear. Questions whether RiverOak has significant funding to relocate residents and schools affected by the proposals or CPO homes at market price + 25%.	Y	A Funding Statement (document reference TR020002/APP/3.2) setting out how the Proposed Development will be funded forms part of the application.
		There needs to be an outright prohibition on night flights between 9pm and 9am	N	RiverOak is proposing a night time policy which imposes movement limits combined with measures to reduce noise. Further information can be found in Chapter 12 of the ES

				(document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4).
BHLF-M3TP- EF3T-P	12 June 2017	Strongly objects to proposals.	N	RiverOak notes this response although it disagrees.
		Not a sound business case for reopening the airport. Believes there are better alternative uses for the site, including manufacturing businesses and housing,	N	The Azimuth Report (document reference TR020002/APP/7.4) provides an extensive case for the reopening of Manston Airport. An operational airport would stimulate manufacturing in the local area and attract businesses to locate near to the Manston site. As of January 2018, the Manston Airport site is no longer being promoted as a mixed use settlement for up to 2,500 new homes in the new draft Thanet Local Plan. Thanet District Council launched a 'Call For Sites' in February 2018 which invites anyone to submit details of a site that they consider suitable for development. This could include sites suitable for housing development which have not yet been considered by the Council that could absorb the 2,500 houses previously allocated at the airport. As shown in the Azimuth Report, no other airports can provide capacity for a freighter hub.
		Proposals will bring unacceptable levels of noise and air pollution to the area.	N	The air quality effects resulting from the Proposed Development have been assessed in Chapter 6: Air Quality of the ES (document reference TR020002/APP/5.2-1). The assessment shows that air quality will remain comfortably within legal limits. These legal limits are themselves based on World Health Organization guidance on health effects, allowing for the most vulnerable members of society. The air quality impacts of the airport are small and confined to the vicinity of the airfield and certain major roads. The impact of air quality on wildlife, ecosystems and biodiversity is assessed in Chapter 7: Biodiversity of the ES (document reference TR020002/APP/5.2-1) and is shown to be not significant.

				The potential noise effects resulting from the Proposed Development have been assessed in Chapter 12: Noise of the ES (document reference TR020002/APP/5.2-1). A summary of the significant residual effects is provided at Section 12.10. Based on this assessment, RiverOak has developed a Noise Mitigation Plan to reduce noise effects (document reference TR020002/APP/2.4). The impact of noise on wildlife, ecosystems and biodiversity is assessed in Chapter 7: Biodiversity of the ES (document reference TR020002/APP/5.2-1).
		Need absolute prohibition on night flights.	N	RiverOak is proposing a night time policy which imposes movement limits combined with measures to reduce noise. Further information can be found in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4).
ANON-M3TP-E8KA-D	12 June 2017	Strongly supports proposals.	N	RiverOak notes and welcomes this response.
		Would like to see the reintroduction of air shows.	N	RiverOak supports air shows in principle but points out that they are not compatible with the operation of a busy airport. Ultimately the decision would lie with the CAA.
		Supportive of proposals to develop and enhance museums.	N	RiverOak notes and welcomes this response.
		Concerned about noise in the vicinity of their property and would like to explore attenuation measures with RiverOak.	N	Any residential properties with habitable rooms within the 63 dB LAeq (16 hour) day time contour will be eligible for a payment to fund sound insulation. Those residential properties that are not entitled to this payment but which have bedrooms that fall within the 55dB LAeq (8 hour) night time contour will be eligible for a payment to fund sound insulation.

		Would favour outright prohibition on night flights.	N	RiverOak is proposing a night time policy which imposes movement limits combined with measures to reduce noise. Further information can be found in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4).
BHLF-M3TP-EFT1-M	12 June 2017	Generally supports proposals.	N	RiverOak notes and welcomes this response.
		Would like to see the airport opened up for educational and training purposes.	N	RiverOak supports this and a dialogue has already begun with the appropriate bodies.
		Would like support to be given to local nature organisations in order to mitigate any loss or detriment to wildlife.	N	RiverOak would be glad to explore this further. Wood solicited engagement (twice) with the Kent Wildlife Trust regarding provision of off-Site mitigation, although did not receive a response to either request
		Concerned about impact of works on water table.	N	It is proposed that any impacts upon the water table will be appropriately mitigated. Proposed mitigation is discussed in the mitigation section of Chapter 8 in the ES (document reference TR020002/APP/5.2-1).
		Concern about Jentex access within village of Cliffsend	Y	The access to the Fuel Farm (Jentex site) will be directly from the A299 and no HGVs will be permitted to routes through the village of Cliffsend as set out in the Airport Surface Access Strategy, Appendix O to the Transport Assessment (document reference TR020002/APP/5.2-25). This is the access arrangement previously used when the site was operational.
		Buildings and service apparatus should be earthquake proof.	N	The buildings and services will be designed in accordance with UK building regulations, EASA requirements for licensing and industry good practice for the fuel storage. There is no indication that Kent is in a higher seismic region than elsewhere in the UK.

				Application of UK regulations, alongside industry standards and codes is therefore considered appropriate.
		Would like to see comprehensive noise and pollution mitigation measures.	Y	<p>The air quality effects resulting from the Proposed Development have been assessed in Chapter 6: Air Quality of the ES (document reference TR020002/APP/5.2-1). The assessment shows that air quality will remain comfortably within legal limits. These legal limits are themselves based on World Health Organization guidance on health effects, allowing for the most vulnerable members of society. The air quality impacts of the airport are small and confined to the vicinity of the airfield and certain major roads. The impact of air quality on wildlife, ecosystems and biodiversity is assessed in Chapter 7: Biodiversity of the ES (document reference TR020002/APP/5.2-1) and is shown to be not significant.</p> <p>The potential noise effects resulting from the Proposed Development have been assessed in Chapter 12: Noise of the ES (document reference TR020002/APP/5.2-1). A summary of the significant residual effects is provided at Section 12.10. Based on this assessment, RiverOak has developed a Noise Mitigation Plan to reduce noise effects (document reference TR020002/APP/2.4). The impact of noise on wildlife, ecosystems and biodiversity is assessed in Chapter 7: Biodiversity of the ES (document reference TR020002/APP/5.2-1).</p>
		Need an absolute prohibition on night flights save in the most extreme circumstances.	N	<p>RiverOak is proposing a night time policy which imposes movement limits combined with measures to reduce noise. Further information can be found in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4).</p>

		Would like to see daytime passenger flights to and from destinations in the UK, Europe and the US.	Y	RiverOak can confirm its intention for regular daytime passenger flights to Europe. Regular flights to the US are less likely in the short term.
BHLF-M3TP-EBU2-J	12 June 2017	Strongly supports proposals.	N	RiverOak notes and welcomes this response.
		There is a strong business case for the proposals, in terms of providing more employment opportunities and greater runway capacity in the south east.	N	RiverOak agrees with and welcomes this response.
		Relocate museums to higher ground by the control tower as ability to view active aircraft will help museums to thrive. Need new buildings for the Spitfire museum to increase capacity.	N	An area of approximately 3ha has been safeguarded in the DCO application for operation of the RAF Manston History Museum, Spitfire & Hurricane Memorial Museum and memorial garden. This area encompasses the current museum and memorial grounds and allows for additional areas in which the museums could be expanded or relocated. A decision on whether to proceed with any relocation works will only be made after consultation with the museum operators to ensure that the museums' needs are reflected. A preliminary meeting was held between RiverOak and the museums on the 26 March 2018.
		Limited night flights enhance business case for reopening airport.	N	RiverOak is proposing a night time policy which imposes movement limits combined with measures to reduce noise. Further information can be found in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4) .
ANON-M3TP-E8A4-P	12 June 2017	Strongly supports proposals.	N	RiverOak notes and welcomes this response.
		Thinks there is a robust business case for the reopening of the airport in terms of	N	RiverOak agrees with and welcome this response.

		providing employment opportunities, attracting tourists to the area and easing pressure on other airports in the south east.		
		Suggests long term grants or similar could assist the museums.	N	RiverOak is considering whether to make a financial contribution to the upkeep of the museums.
		Proposals need to be sympathetic to local road network. Concerned by overcrowding on Clifsend Road and would want to prevent any “cutting through” on unsuitable roads to access the airport. Would also like to see a one way system introduced on Canterbury Road East up to the airport.	Y	The Transport Assessment (document reference TR020002/APP/5.2-15) sets out the assessment and consequent proposals for traffic movements on the local highways network as a result of the potential impact of the Proposed Development. On this basis it is not proposed to route any traffic through the village of Clifsend. The only impact on Canterbury Road East would be from traffic leaving the A299 to the Fuel Farm, but this is not through the village itself. This is the operation in terms of access to the fuel farm that has always been used. As such no one way systems are proposed.
		Suggests rail should be used to supply the airport to reduce road traffic.	N	No existing rail connection to the site exists and to do so would involve numerous complex issues to be addressed at great cost. Primarily the need for a rail connection would need to be to the north of the airstrip which is not viable due to the various road, rail and environmental constraints. It is not proposed to use a direct rail connection to the site.
		Would prefer no night flights.	N	RiverOak is proposing a night time policy which imposes movement limits combined with measures to reduce noise. Further information can be found in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4) .

ANON-M3TP- EFCK-W	12 June 2017	Strongly supports proposals. Believes opening the airport would put the life blood back into Thanet.	N	RiverOak notes and welcomes this response.
		Night flights to be monitored and controlled.	N	RiverOak is proposing a night time policy which imposes movement limits combined with measures to reduce noise. Further information can be found in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4).
		Ensure memorial at museums is looked after.	Y	Space for the memorial has been reserved in the proposals.
		Would like to see a requirement for local employment.	N	RiverOak undertakes that training opportunities will be developed for young people living locally and that, subject to the operation of law, priority will be given to local people in terms of job opportunities and recruitment.
BHLF-M3TP- EF7H-E	12 June 2017	Strongly objects to proposals. Believes the site should be retained for housing development.	N	As of January 2018, the Manston Airport site is no longer being promoted as a mixed use settlement for up to 2,500 new homes in the new draft Thanet Local Plan. Thanet District Council launched a 'Call For Sites' in February 2018 which invites anyone to submit details of a site that they consider suitable for development. This could include sites suitable for housing development which have not yet been considered by the Council that could absorb the 2,500 houses previously allocated at the airport. However, no other airport in the South East can provide much needed capacity for a dedicated freighter hub. The operation of Manston Airport would bring considerable employment to the area, which has high deprivation including unemployment.

		Need absolute prohibition on night flights.	N	RiverOak is proposing a night time policy which imposes movement limits combined with measures to reduce noise. Further information can be found in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4) .
		Very concerned by noise disruption and the effect this will have on the health of local residents.	N	The Health Impact Assessment, Appendix 15.1 of the ES (document reference TR020002/APP/5.2-13) assesses the potential health impacts associated with changes in noise and air pollution. Where adverse effects are predicted, measures to mitigate these are set out in the Noise Mitigation Plan (document reference TR020002/APP/2.4) .
		Would like to see regeneration of RAF Manston and Hurricane and Spitfire museums and better road signage to them from all surrounding roads.	N	With the redevelopment of the museum site, a refresh of the local road signage could be considered as part of detailed proposals post submission of the DCO application. However at this stage this has not been considered.
BHLF-M3TP- EFHS-A	12 June 2017	Generally supports proposals.	N	RiverOak notes and welcomes this response.
		Need absolute prohibition on night flights.	N	RiverOak is proposing a night time policy which imposes movement limits combined with measures to reduce noise. Further information can be found in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4) .
		Would like to see passenger flights rolled out as soon as possible.	Y	The intention is that passenger destinations will be short haul to Europe. The intention is for a low-cost carrier to base a small number of aircraft at Manston. The carrier will decide the destinations based on passenger demand.

ANON-M3TP-E8Q1-3	12 June 2017	Strongly supports proposals. Believes re-opening Manston is essential to mitigate capacity problems in the UK aviation sector.	N	RiverOak agrees with and welcomes this comment.
		Reopening of the airport essential to survival of RAF Manston and Spitfire and Hurricane Museums.	N	RiverOak notes this comment.
		Would like to discuss possibility of new museum being built entirely on the site of the old ATC tower to enhance views of the runway. Current site could be used for general airport development.	N	An area of approximately 3ha has been safeguarded in the DCO application for operation of the RAF Manston History Museum, Spitfire & Hurricane Memorial Museum and memorial garden. This area encompasses the current museum and memorial grounds and allows for additional areas in which the museums could be expanded or relocated. A decision on whether to proceed with any relocation works will only be made after consultation with the museum operators to ensure that the museums' needs are reflected. A preliminary meeting was held between RiverOak and the museums on the 26 March 2018.
		Believe that restrictions on night flights will weaken business case for the airport. Occasional air movement between 23:00 and 06:00 would have minimal impact.	N	RiverOak has proposed limits on night flights that would allow the airport to operate based on its strong business case.
ANON-M3TP-E8VF-W	12 June 2017	Very supportive of proposals.	N	RiverOak notes and welcomes this response.
		Would like to see local people employment wherever possible.	N	RiverOak undertakes that training opportunities will be developed for young people living locally and that, subject to the operation of law, priority will be given to local people in terms of job opportunities and recruitment.

		Build Spitfire & Hurricane museum with three aircraft bays, space for simulator and upstairs café and viewing area.	N	An area of approximately 3ha has been safeguarded in the DCO application for operation of the RAF Manston History Museum, Spitfire & Hurricane Memorial Museum and memorial garden. This area encompasses the current museum and memorial grounds and allows for additional areas in which the museums could be expanded or relocated. A decision on whether to proceed with any relocation works will only be made after consultation with the museum operators to ensure that the museums' needs are reflected. A preliminary meeting was held between RiverOak and the museums on the 26 March 2018.
		No objection to limited night flights.	N	RiverOak notes this comment.
BHLF-M3TP-EFH8-F	12 June 2017	Strongly supports proposals.	N	RiverOak notes and welcomes this comment.
BHLF-M3TP-EFME-1	12 June 2017	Strongly object to proposals.	N	RiverOak notes this response although it disagrees.
		Wrong location for an airport. Would prefer to see housing on the site.	N	As of January 2018, the Manston Airport site is no longer being promoted as a mixed use settlement for up to 2,500 new homes in the new draft Thanet Local Plan. Thanet District Council launched a 'Call For Sites' in February 2018 which invites anyone to submit details of a site that they consider suitable for development. This could include sites suitable for housing development which have not yet been considered by the Council that could absorb the 2,500 houses previously allocated at the airport. The Manston site is zoned for aviation use and reopening the airport will provide much needed employment opportunities in an area of relatively high deprivation. The Azimuth Report (document reference TR020002/APP/7.4) provides details of the case for reopening the airport in some depth and finds that

				there are no other airports that can be used to reduce the impact of UK airport capacity constraints on the freight market.
		Concern about noise, vibration and air pollution the airport would bring.	N	<p>The potential noise effects resulting from the Proposed Development have been assessed in Chapter 12: Noise of the ES (document reference TR020002/APP/5.2-1). A summary of the significant residual effects is provided at Section 12.10. Based on this assessment, RiverOak has developed a Noise Mitigation Plan to reduce noise effects (document reference TR020002/APP/2.4). The impact of noise on wildlife, ecosystems and biodiversity is assessed in Chapter 7: Biodiversity of the ES (document reference TR020002/APP/5.2-1).</p> <p>The air quality effects resulting from the Proposed Development have been assessed in Chapter 6: Air Quality of the ES (document reference TR020002/APP/5.2-1). The assessment shows that air quality will remain comfortably within legal limits. These legal limits are themselves based on World Health Organization guidance on health effects, allowing for the most vulnerable members of society. The air quality impacts of the airport are small and confined to the vicinity of the airfield and certain major roads. The impact of air quality on wildlife, ecosystems and biodiversity is assessed in Chapter 7: Biodiversity of the ES (document reference TR020002/APP/5.2-1) and is shown to be not significant.</p>
ANON-M3TP-EFZW-Z	12 June 2017	Generally supports proposals.	N	RiverOak notes and welcomes this response.
		Would like to see passenger flights only but appreciates that freight supports the airport's business case.	Y	A passenger-only operation is unlikely to be viable at Manston Airport. In order to provide a sustainable passenger service, the RiverOak business plan focuses on the freight market to ensure the viability of the airport into the future. The Azimuth Report

				(document reference TR020002/APP/7.4) provides further information and detail on this topic.
		Believes that the airport will generate economic benefits for local area and that passenger flights may create more jobs with more associated employment.	N	RiverOak agrees with and welcomes this response.
		Restrictions on night flights and deployment of modern, quieter aircraft would enhance the proposals.	Y	RiverOak is proposing a night time policy which imposes movement limits combined with measures to reduce noise. Further information can be found in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4) .
BHLF-M3TP-E8BP-K		Would like a guarantee that there is no pollution risk from air traffic that would negatively affect crops under the flight path.	N	<p>The Air Quality Regulations specify a maximum legal level of NOx for the protection of vegetation, including crops. This level is based on the evidence about levels below which no damage to vegetation occurs.</p> <p>RiverOak's air quality assessment shows that during operation, concentrations outside the airport boundary will remain below this limit. Concentrations may go slightly above the limit temporarily during construction, under the conservative assumption that all construction plant is more than six years old and all construction activity is compressed into a single year. In view of the conservatism of the modelling and the safety factors included in the legal limit, it is highly unlikely that there will be an adverse effect on crops.</p> <p>Concentrations above the limit are routinely found alongside major roads (e.g. within about 50 m of the A299), and the extra traffic from the operation of the development will increase these</p>

				by a small amount (up to about 2 m further from the road in the worst case).
		Requests assurance that proposed night flights will not disturb local residents' sleep between 10pm and 6am and that RiverOak will mitigate any negative impacts of night flights.	N	RiverOak is proposing a night time policy which imposes movement limits combined with measures to reduce noise. Further information can be found in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4) .
BHLF-M3TP- EFAS-3	12 June 2017	Strongly supports proposals, which will boost local economy.	N	RiverOak welcomes this response.
		An annual air show and drag racing day on the runway would generate greater interest in the airport.	N	RiverOak supports air shows in principle but points out that they are not compatible with the operation of a busy airport. Ultimately the decision would lie with the CAA. Drag racing will not be possible because of potential damage to the runway.
		Would like to see the airport opened up to local schools for educational purposes and an apprenticeship scheme run to help local teenagers find work.	N	RiverOak will continue to work with local education providers and, should the DCO be granted, work with local schools to leverage maximum benefit for local people, particularly in terms of raising the aspirations of young people and encouraging participation in Higher and Further Education.
		Believes that a revamp of the RAF Manston and Spitfire and Hurricane Museums is a very positive element of the proposals and suggests a regular celebration of the spitfire.	N	RiverOak has allocated space for the museums to continue and to expand, it is up to them how they do this.
		Small number of night flights would be acceptable, subject to strict regulation.	Y	RiverOak is proposing a night time policy which imposes movement limits combined with measures to reduce noise. Further information can be found in Chapter 12 of the ES

		Believes the benefits would outweigh the problems associated with them.		(document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4) .
		Would like to see introduction of passenger flights.	Y	RiverOak does intend there to be regular daytime passenger flights to Europe.
		Proposals should incorporate requisite improvements to the local road network.	Y	The Transport Assessment (document reference TR020002/APP/5.2-15) sets out the results of a capacity assessment on the local road network for links and junctions. Where it has been found that local roads cannot accommodate the predicted levels of traffic, mitigation schemes have been proposed. Details of the mitigation schemes are included in the Transport Assessment.
ANON-M3TP-EFB5-6	12 June 2017	Strongly supports proposals.	N	RiverOak notes and welcomes this response.
		Concerned by detrimental impact that increase in noise and traffic on the local road network could bring to local residents and tourism to the area.	N	<p>The potential noise effects resulting from the Proposed Development have been assessed in Chapter 12: Noise of the ES (document reference TR020002/APP/5.2-1). A summary of the significant residual effects is provided at Section 12.10. Based on this assessment, RiverOak has developed a Noise Mitigation Plan to reduce noise effects (document reference TR020002/APP/2.4). The impact of noise on wildlife, ecosystems and biodiversity is assessed in Chapter 7: Biodiversity of the ES (document reference TR020002/APP/5.2-1).</p> <p>Transport effects have been assessed and where junctions are affected, these are being improved as part of the project.</p> <p>The effects on tourism are discussed within Chapter 13: Socio-Economics of the ES (document reference TR020002/APP/5.2-2). Tourism receptors in the vicinity of the Proposed Development may experience effects resulting from the increased activity in the</p>

				<p>geographical area, in both construction and operational phases. For tourism businesses within the surrounding area, the increased visitor numbers associated with the airport operation, in conjunction with increased incomes from employees at Manston, will likely lead to increased demand for tourism facilities and associated spending in the locality. This could result in improvements to their volume of trade.</p> <p>In terms of indirect impacts, such as increased traffic, noise or dust, detailed assessments have been undertaken in Chapter 6: Air Quality, Chapter 12: Noise and Chapter 14: Traffic and Transport of the ES (document reference TR020002/APP/5.2-1 – 5.2-2). The negative effects on tourism are commonly observed to be related to noise and traffic.</p> <p>The effects of noise on tourist businesses will be minimal as the increase in urban areas will be small compared to existing sources. Aircraft noise will increase at the main beach in the centre of Ramsgate which is already subject to urban noise but there will be no noticeable noise increases at any other Kent beaches.</p> <p>Outside these areas the effects will depend on existing background levels but in general are considered sufficiently low not to affect the level of business activity or value. The site is well connected by road and rail and traffic increases are assessed to be minimal. The effects of traffic on tourism are considered to be low and will not affect the level of business activity or value.</p>
		<p>Particularly concerned that two lanes on both the A2 and A299 will be insufficient for traffic to and from the airport. Also concerned that traffic, in particular HGVs,</p>	<p>N</p>	<p>An assessment of the capacity of the A2 and the A299 has been undertaken to ascertain the capacity impacts of these links with the Transport Assessment (document reference TR020002/APP/5.2-15). It is currently not proposed to allow HGV</p>

		going to the airport will come through Manston Village, which would have very negative impact on local residents.		construction or operational vehicles to use any route to the site other than the A299, Minster Road and Spitfire Way corridor as part of the Construction Traffic Management Plan and Airport Surface Access Strategy at Appendices M and O of the Transport Assessment (document reference TR020002/APP/5.2-25).
		Does not think night flights are a good idea as they would negatively affect residents and visitors and would like assurance that there would be no night flights except in exceptional circumstances.	N	RiverOak is proposing a night time policy which imposes movement limits combined with measures to reduce noise. Further information can be found in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4).
		Would like an assurance that no entrance or exit would be placed on Manston Court Road for the proposed redevelopment of the grounds behind the attenuation ponds.	Y	No highway connections are planned onto Manston Court Road as part of the development. Proposed Highways accesses are shown on the Access and Rights of Way Plans (document reference TR020002/APP/4.6). There is potential for a cycle or pedestrianised access onto Manston Court road but no such connection is currently planned.
		Concerned by the location of the proposed warehouses close to consultee's property and holiday properties. Would like to see them moved further away and for façade of the warehouses to be disguised as much as possible. A solution could be to move the attenuation ponds and museum to the site of the proposed warehouses and resite the warehouses to the opposite side of the site from the residential buildings	Y	The location of the attenuation ponds is necessarily fixed as this is the natural low point of the overall site. In order to restrict visual impact a 45m buffer zone of no development has been provided to the western and eastern boundaries of the airport related business development on the Northern Grass. The airport cargo facilities are positioned to achieve both airside and landside access whilst also provided noise screening between the aircraft stands and residential receptors. Visual aesthetics of the buildings will be developed sympathetically to local receptors. Details of design principles can be found in the Design and Access Statement (document reference TR020002/APP/7.3).

		Would like to see onsite amenities such as cafes and restaurants and viewing platform as part of the proposals.	Y	Cafes, viewing facilities and other amenities are not part of the DCO masterplan but there is scope to review this again at the detailed design stage once critical infrastructure is in place.
		Requests that people are kept involved in the process so that local people have an input into the Proposed Development.	Y	Stakeholders will be kept informed as the project develops, through the DCO process and the establishment of a consultative committee.
BHLF-M3TP-EFXC-A	12 June 2017	Strongly supports proposals.	N	RiverOak notes and welcomes this response.
		Business case for reopening airport is strong and will rejuvenate the area and bring numerous job opportunities.		RiverOak agrees with and welcomes this response.
		Development of airport would in itself guarantee the survival and promotion of the museum.	N	RiverOak notes and welcomes this response.
BHLF-M3TP-E85G-W	12 June 2017	Strongly supports proposals.	N	RiverOak notes and welcomes this response.
		Would like to see requirement for a proportion of contractors to use labour sourced from local employment pool.	N	RiverOak will advertise jobs locally so that the benefits to the local area are maximised, and travel to the site is minimised.
ANON-M3TP-E82Z-D	12 June 2017	Strongly objects to proposals.	N	RiverOak notes this response although it disagrees.
		Business plan is unrealistic and unachievable.	N	The Azimuth Report (document reference TR020002/APP/7.4) provides a detailed case for the reopening of the airport. It is clear that the UK needs additional airport capacity. The evidence shows that air freight is particularly vulnerable to capacity constraints not only in the UK but also in Europe (see the Schiphol Airport example). Manston Airport zoned for aviation use, can provide

				<p>some of the much-needed capacity almost immediately. RiverOak's planned investment in the airport would provide state-of-the-art facilities for freight, addressing many of the current difficulties experienced by freighter operators.</p>
		<p>Tourist industry in Ramsgate would be decimated by noise and air pollution generated by low flying aircraft.</p>	N	<p>The effects on tourism are discussed within Chapter 13: Socio-Economics of the ES (document reference TR020002/APP/5.2-2). Tourism receptors in the vicinity of the Proposed Development may experience effects resulting from the increased activity in the geographical area, in both construction and operational phases. For tourism businesses within the surrounding area, the increased visitor numbers associated with the airport operation, in conjunction with increased incomes from employees at Manston, will likely lead to increased demand for tourism facilities and associated spending in the locality. This could result in improvements to their volume of trade.</p> <p>In terms of indirect impacts, such as increased traffic, noise or dust, detailed assessments have been undertaken in Chapter 6: Air Quality, Chapter 12: Noise and Chapter 14: Traffic and Transport of the ES (document reference TR020002/APP/5.2-1 – 5.2-2). The negative effects on tourism are commonly observed to be related to noise and traffic.</p> <p>The effects of noise on tourist businesses will be minimal as the increase in urban areas will be small compared to existing sources. Aircraft noise will increase at the main beach in the centre of Ramsgate which is already subject to urban noise but there will be no noticeable noise increases at any other Kent beaches.</p> <p>Outside these areas the effects will depend on existing background levels but in general are considered sufficiently low</p>

				not to affect the level of business activity or value. The site is well connected by road and rail and traffic increases are assessed to be minimal. The effects of traffic on tourism are considered to be low and will not affect the level of business activity or value.
		No need for museums to be changed.	N	An area of approximately 3ha has been safeguarded in the DCO application for operation of the RAF Manston History Museum, Spitfire & Hurricane Memorial Museum and memorial garden. This area encompasses the current museum and memorial grounds and allows for additional areas in which the museums could be expanded or relocated. A decision on whether to proceed with any relocation works will only be made after consultation with the museum operators to ensure that the museums' needs are reflected. A preliminary meeting was held between RiverOak and the museums on the 26 March 2018.
		Strongly opposed to night flights. Notes that night flights would disrupt sleep which can have severe effects on health.	N	RiverOak is proposing a night time policy which imposes movement limits combined with measures to reduce noise. Further information can be found in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4). No significant effect on sleep disturbance is predicted due to the anticipated low number and noise of night-time flights.
		Noise and air pollution associated with the airport would have a devastating effect on the health and lives of local population.	N	The Health Impact Assessment, Appendix 15.1 of the ES (document reference TR020002/APP/5.2-13) assesses the potential health impacts associated with changes in noise and air pollution. Where adverse effects are predicted, measures to mitigate these are set out in the Noise Mitigation Plan (document reference TR020002/APP/2.4).

		Inadequate consultation with local residents. Need further information about compensation.	Y	As part of Stage 3 Consultation, RiverOak prepared and consulted on a draft Noise Mitigation Plan which included a proposed compensation scheme. Following consultation this has now been modified and forms part of the application submission as the Noise Mitigation Plan (document reference TR020002/APP/2.4).
ANON-M3TP- EF5A-5	12 June 2017	Strongly supports proposals.	N	RiverOak notes and welcomes this response
		Suggests public should be kept informed about proposals.	Y	The Planning Inspectorate website will be updated throughout the examination phase. RiverOak's website will be kept updated should the DCO be granted.
		Museums building should be retained and possibly extended. Airport should offer general support.	Y	An area of approximately 3ha has been safeguarded in the DCO application for operation of the RAF Manston History Museum, Spitfire & Hurricane Memorial Museum and memorial garden. This area encompasses the current museum and memorial grounds and allows for additional areas in which the museums could be expanded or relocated. A preliminary meeting was held between RiverOak and the museums on the 26 March 2018.
		No problem with night flights if they are necessary to maintain a good commercial schedule.	N	RiverOak notes this response.
BHLF-M3TP- EF3M-F		Strongly supports proposals. Considers the airport would be good for local businesses and would be much better than having a housing estate.	N	RiverOak notes and welcomes this response.

Summary of Influence on the Proposed Development

- 7.28 The issues raised covered a significant range and amplify the issues raised during the non-statutory consultation. To address aircraft noise, RiverOak has developed a series of commitments to limit noise in its Noise Mitigation Plan (**document reference TR020002/APP/2.4**). The masterplan (**document reference TR020002/APP/7.1**) has been refined in line with comments raised during this consultation, and the environmental assessment has taken into account the comments of statutory consultees, with whom dialogue is continuing, particular attention being paid to noise, air quality and the effect on the surface transport network. The museums will be safeguarded and allowed to expand in an area set aside for them, should that align with their own plans.

8 STAGE 2: STATUTORY CONSULTATION: COMMUNITY CONSULTATION (SECTION 47)

Development of the SoCC

- 8.1 Before commencing statutory community consultation, RiverOak prepared a draft SoCC setting out how it intended to consult people living in the vicinity of the land affected by the Proposed Development.
- 8.2 The primary goal of the SoCC was to set out a consultation that fully complied with the statutory requirements and government guidance on pre-application consultation for Nationally Significant Infrastructure Projects, while also carrying out an effective consultation to ensure that people living and working in the vicinity of the area have the opportunity to engage in the process. RiverOak reviewed feedback from Stage 1 about the consultation process in developing its SoCC.
- 8.3 In producing the SoCC, RiverOak researched the local area and considered the most appropriate means of consulting each category of consultee, given the nature and scale of the Proposed Development. Building on the first stage of consultation, RiverOak developed a consultation strategy that included the following aims and objectives:
 - 8.3.1 Ensure the consultation was undertaken in compliance with the PA 2008, specifically sections 37, 42-49 as relate to pre-application consultation, using best practice consultation methods and drawing on expertise from other major infrastructure Proposed Developments
 - 8.3.2 Include a wide range of stakeholders (as set out above) by making the consultation accessible, with information available in hard copy and online, in both technical and non-technical formats
 - 8.3.3 Clearly communicate the benefits and impacts of RiverOak's proposals and set out what can and cannot be influenced as part of the consultation
 - 8.3.4 Offer appropriate and convenient methods, both traditional and digital, of providing feedback to help make it easy for consultees to respond to the consultation
 - 8.3.5 Take reasonable steps to identify, engage and consult with hard to reach groups potentially affected or interested in the Proposed Development
 - 8.3.6 Utilise existing local networks and stakeholder relations to raise awareness and promote the consultation
 - 8.3.7 Ensuring all feedback received is considered, and
 - 8.3.8 Utilise local expertise, knowledge and experience that may challenge the technical and environmental aspects of the proposals.
- 8.4 A copy of the draft SoCC can be found at **Appendix 17**.
- 8.5 In accordance with Section 47(2), RiverOak then consulted the following host Local Authorities and Parish and Town Councils (those with an asterisk being statutory consultees on the SoCC) about the contents of the draft SoCC:

- 8.5.1 Kent County Council* (KCC)
 - 8.5.2 Thanet District Council* (TDC)
 - 8.5.3 Dover District Council (DDC)
 - 8.5.4 Canterbury City Council (CCC)
 - 8.5.5 Acol Parish Council
 - 8.5.6 Birchington Parish Council
 - 8.5.7 Broadstairs and St Peters Town Council
 - 8.5.8 Cliffsend Parish Council
 - 8.5.9 Manston Parish Council
 - 8.5.10 Mayor and Charter Trustees of Margate
 - 8.5.11 Minster Parish Council
 - 8.5.12 Monkton Parish Council
 - 8.5.13 Ramsgate Town Council
 - 8.5.14 Sandwich Town Council
 - 8.5.15 St Nicholas-at-Wade with Sarre Parish Council
 - 8.5.16 Westgate-on-Sea Town Council
- 8.6 On 6 February 2017, an email was sent to the Local Authorities and additional parish and town councils listed in paragraph 8.5, informing them that RiverOak would be shortly consulting on its SoCC and asking who at each organisation would be best placed to receive the email containing the SoCC.
- 8.7 Of these, all but one responded to confirm email details. Where an alternative email address was provided this was then used when emailing the SoCC to each Local Authority for comment.
- 8.8 The draft SoCC was emailed to the Local Authorities and parish and town councils listed in paragraph 8.5 on 10 February 2017 together with a short covering email seeking their comments on what would be the best way to consult with the community. A copy of the email sent can be found at **Appendix 18**. Responses were asked for by close of business on Friday 10 March 2017, providing the 28 days for response as set out in the Act.
- 8.9 During this period, only four of the authorities responded: KCC, TDC, DDC and Cliffsend Parish Council. No further late responses were received after the 28 day period.
- 8.10 A summary of all of the responses received to the requested email address and an explanation of how RiverOak took account of these responses is provided in **Table 8.1** below.

Table 8.1: Local Authority responses in respect of draft SoCC and how RiverOak had regard to the responses

Local Authority Response	Change made to the SoCC as a result of response? Y / N	How RiverOak had regard to the response
Kent County Council		
Check with Kent libraries before depositing documents for inspection.	N	RiverOak confirms that it agrees with this suggestion and that this action has been undertaken.
Consultation documents on the consultation website should be formatted to allow for audio transcription.	N	RiverOak confirms that this will be enabled.
Consultation events are to be a mixture of weekday, weekend, daytime and evening.	N	The consultation events will be held over a two week period in June 2017, collectively covering the days Monday to Saturday and the time period of 10.00 to 20.00.
Consultation event venues should be wheelchair accessible.	Y	The SoCC has been updated to include further details about accessibility at each venue. This is shown in the table at section 8.1 of the SoCC.
Sandwich Town Council should be consulted.	Y	RiverOak confirms that Sandwich Town Council will be consulted, as per the list at Appendix 1 of the SoCC.
Consultation zone should be in line with the 48dB contour from when the airport was previously operational.	N	RiverOak considered the responses and increased its proposed 1km boundary to 2km (the Stage 3 Consultation increased this much more to 50,000 nearby properties). Newspaper coverage was undertaken for the whole of east Kent.

Additional consultation event should be held in either Cliffsend or Acol.	Y	RiverOak confirms that an additional consultation event will be held at Cliffsend Village Hall on Friday 16 June between 14.00 and 20.00. The details of this are provided in the SoCC
Hard to reach groups should include representatives of the nine protected characteristics in the Equality Act 2010.	N	RiverOak wrote to KCC on 12 April 2017 requesting that any information that KCC had on such 'hard to reach' groups were shared with RiverOak. No response has been received from the Council.
Thanet District Council		
State explicitly that the consultation is open to everyone.	Y	RiverOak confirms that the consultation is open to everyone and the SoCC makes clear that this is the case.
A hard copy of the consultation documents should be supplied to TDC.	Y	As a statutory consultee, TDC will be provided with a hard copy of the suite of consultation documents.
Copies of deposited consultation documents should be checked weekly for completeness rather than fortnightly.	N	RiverOak confirms that the consultation documents will be checked in person weekly by a member of its consultant team.
Consultation documents should be made available as HTML and PDF on consultation website.	N	RiverOak confirms that this will be made available.
Consultation event venues should be accessible by bus.	Y	The SoCC has been updated to include information about bus routes accessibility at all of the consultation venues. This is shown in the table at section 8.1 of the SoCC.
There should be no intimidation or disregard of attendees at consultation events and all those present on behalf of RiverOak should be from RiverOak itself or consultants employed by it.	N	RiverOak confirms that there has never been any intimidation or disregard of attendees at consultation events and that there will not be any at the forthcoming statutory consultation events.

Free text responses should be allowed on the Consultation Feedback Form.	Y	RiverOak confirms that the Feedback Form will allow free text responses.
Demographic data and the nature of respondents should be collected.	N	RiverOak confirms that this will be gathered.
Personal data should not be shared with third parties.	N	RiverOak confirms that any personal data supplied during the consultation will be dealt with in accordance with its data protection statement as set out in the Feedback Form, and set out below for ease of reference: <i>“Personal information that is supplied to RSP in response to this consultation will be treated confidentially and processed and handled in accordance with the Data Protection Act 1998. The information may be disclosed to or shared with RSP’s agents, contractors and advisors who provide services to RSP in connection with RSP’s preparation of an application for development consent under the Planning Act 2008. This will allow RSP to fully consider the responses and use them in the preparation of application materials. Upon submission of RSP’s application for development consent, the Secretary of State may require RSP to supply copies of all consultation responses received. If a request is made, RSP is under a legal obligation to supply copies of the response to the Secretary of State. By submitting a consultation response to RSP, a respondent agrees that RSP may supply a copy of their response to the Secretary of State via the Planning Inspectorate if required to do so.”</i>
Consultation documents should state whether feedback will be published, how it will be weighted and how it will be analysed.	N	Section 11 of the SoCC sets out how the information received during consultation will be used.
Thanet Business Forum, and Coastal Community teams in Ramsgate, Broadstairs and Margate should be consulted.	Y	RiverOak confirms that it will consult these organisations, as set out in Appendix 1 of the SoCC.

Consultation should be extended to be eight weeks long.	N	The minimum time required under the PA 2008 for statutory consultation is 28 days. RiverOak has allowed an extra two weeks taking the total length of the consultation to 42 days. It has considered TDC's request but does not agree that there is any reason why the statutory consultation should be extended by a further two weeks.
All properties within 3km of Manston Airport should be consulted.	Y (partial)	RiverOak has agreed to extend its originally-proposed consultation zone from 1km from the airport boundary to 2km from the airport boundary. Additionally, newspaper notices about the consultation will be published in a wide area covering east Kent.
Newspaper coverage to cover all of Thanet, Herne Bay and Sandwich.	N	Newspaper coverage will cover the whole of east Kent.
A consultation event should be held in either Birchington or Minster, but preferably both.	N	RiverOak considers that the seven consultation events it plans to hold are sufficient to provide coverage for the areas of Birchington and Minster. However, as stated in section 8.1 of the SoCC, RiverOak will offer individual presentations to Birchington Parish Council and Minster Parish Council.
A consultation event should be held in Ramsgate on both a weekday and a weekend.	N	A consultation event is being held in Ramsgate on Saturday 24 June from 10.00 to 14.00. A further six events are being held in other venues within Kent and as these are being held during weekdays RiverOak does not consider it necessary to hold any further events in Ramsgate. (Stage 3 Consultation added a further 8-hour event in Ramsgate during the week)
Attendance at town and Parish Councils should be before and during consultation rather than during and after.	N	RiverOak confirms that it intends to offer presentations to town and Parish Councils during and after the consultation period. Should these councils then provide further feedback on the proposals, RiverOak confirms that it will take these into account, as long as they are provided by a pre-agreed date, despite it being outside the consultation period and thus there will be no

		prejudice to these councils in holding the presentations after the consultation period.
Include drafts of the consultation materials within the SoCC as well as in the consultation leaflet and feedback form.	N	Consultation materials will be made available in hard copy during consultation events and online throughout the statutory consultation period.
Leaflet all properties within 1km of the proposed flightpaths or, if not available, all of Ramsgate, Thanet Villages and Herne Bay.	N	RiverOak has agreed to extend its originally-proposed consultation zone from 1km from the airport boundary to 2km from the airport boundary. All properties within 2km of the site will be sent consultation information in the post. Additionally, newspaper notices about the consultation will be published in a wide area covering east Kent. The Stage 3 Consultation involved the delivery of consultation postcards to all properties under the proposed flightpath swathes near the airport.
Council should be able to comment on identification of hard to reach groups, consultation leaflet and form.	N	RiverOak wrote to TDC on 12 April 2017 requesting that any information that TDC had on such 'hard to reach' groups were shared with RiverOak. No response has been received from the Council.
List all statutory consultees for information to the community.	N	This is not a requirement under the PA 2008 and RiverOak does not consider that it is necessary to do so. It confirms, however, that all statutory consultees will be consulted as appropriate.
Dover District Council		
Set out more information about the infrastructure improvement and upgrade works.	N	RiverOak confirms that information on these aspects is provided within the suite of consultation documents, particularly within Chapter 3 of the 2017 PEIR which provides a description of the Proposed Development.

Town and Parish Councils in Dover District should be invited to have presentations as well.	N	As set out in section 8.1 of the SoCC, RiverOak will offer individual presentations to each of the 12 Parish Councils set out in Appendix 1 of the SoCC.
Site owners should be consulted.	N	RiverOak confirms that the site owners will be consulted.
A wider consultation area should be shown/consulted.	N	RiverOak has agreed to extend its originally-proposed consultation zone from 1km from the airport boundary to 2km from the airport boundary. All properties within 2km of the site will be sent consultation information in the post. Additionally, newspaper notices about the consultation will be published in a wide area covering east Kent. The Stage 3 Consultation involved the delivery of consultation postcards to a much wider zone – 50,000 properties
Newspaper coverage to cover Dover District.	N	Newspaper notices about the consultation will be published in a wide area covering east Kent. Please see Appendix 2 of the SoCC for further details.
Consider holding a consultation event in Deal.	N	RiverOak will be holding a consultation event in Sandwich on 20 June 2017 which is not far from Deal and therefore RiverOak does not consider it necessary to hold another event in Deal itself. However, and in addition, RiverOak confirms that as per section 8.1 of the SoCC, it will offer an individual presentation to Deal Town Council.
Cliffsend Parish Council		
Consultation event should be held in Cliffsend.	Y	RiverOak confirms that it has decided that, at the request of Cliffsend Parish Council, an extra consultation event will be held in Cliffsend.

- 8.11 A copy of the final SoCC can be found at **Appendix 12**.
- 8.12 The SoCC briefly explained what the Proposed Development would involve, why RiverOak was promoting the Proposed Development, the procedure under which the Proposed Development would be consented, how RiverOak would obtain the community's views during the statutory consultation period, and how and when interested persons could make their views known.
- 8.13 In accordance with Section 47(6), the SoCC was then made available for inspection and a notice was published in a local newspaper to explain where the SoCC could be inspected. A copy of the SoCC notice can be found at **Appendix 21**.
- 8.14 The SoCC notice was published as explained in Table 8.2 below.

Table 8.2 SoCC notice: newspapers and dates of publication

Newspaper	Date
Thanet Gazette	Friday 26 May 2017

- 8.15 Copies of the published versions of the notice can be found at **Appendix 22**.
- 8.16 The SoCC was made available for public inspection on RiverOak's website (www.rsp.co.uk) and printed copies were placed in the public libraries set out in **Table 8.3** below for the duration of the consultation. Printed copies were also made available at consultation events.

Table 8.3: Locations at which SoCC was available for public inspection

Venue	Opening hours
Birchington Library	Mon, Tue, Thu, Fri: 9am-6pm Sat: 10am-2pm, Wed, Sun: closed
Broadstairs Library	Mon, Tue, Wed, Fri: 9am-6pm Thu: 9am-8pm, Sat: 9am-5pm, Sun: closed
Cliftonville Library	Mon, Tue, Thu, Fri: 9am-6pm Sat: 10am-2pm, Wed, Sun: closed
Deal Library	Mon-Fri: 9am-6pm, Sat: 9am-5pm Sun: 10am-4pm
Herne Bay Library	Mon-Fri: 9am-6pm, Sat: 9am-5pm Sun: closed
Margate Library	Mon, Tue, Wed, Fri: 9am-6pm Thu: 9am-8pm, Sat: 9am-5pm, Sun: closed
Minster-in-Thamet Library	Mon: 2pm-6pm, Tue, Thu: 9am-1pm and 2pm-6pm, Fri: 9am-6pm, Sat: 10am-2pm, Wed, Sun: closed

Newington Library	Mon, Tue, Thu, Fri: 9am-6pm Sat: 10am-2pm, Wed, Sun: closed
Ramsgate Library	Mon-Fri: 9am-6pm, Sat: 9am-5pm, Sun: closed
Sandwich Library	Mon, Tue, Thu, Fri: 9am-6pm, Sat: 10am-2pm, Wed, Sun: closed
Westgate Library	Mon, Wed: 9am-5pm, Tue, Fri: 9am-6pm, Sat: 10am-2pm, Thu, Sun: closed

8.17 The Proposed Development constitutes EIA Development for the purposes of the EIA. As such, there is a requirement under Regulation 10 of the EIA Regulations that the SoCC must set out that the Proposed Development is EIA Development and how RiverOak intends to publicise and consult on preliminary environmental information. This information is provided at section 4.5 of the SoCC. Further information on EIA consultation can be found in Chapter 11 of this Report.

Timing of Community Consultation

8.18 The consultation commenced on 12 June 2017 and as such took place in parallel with consultation under Section 42 and publicity under Section 48.

8.19 Community consultation closed on 23 July 2017.

Scope of Community Consultation

8.20 Consultation was carried out fully in line with the published SoCC. **Appendix 23** sets out the consultation as prescribed in the published SoCC and how the Applicant carried out consultation in line with it. Details of the activities undertaken as part of the consultation can be found in the below.

8.21 In order to seek the views of members of the local community, local businesses, local organisations and other interested parties living in the vicinity of the Proposed Development, a consultation zone of 2km from the Proposed Development Site was outlined in the SoCC.

8.22 A map showing the consultation zone can be found in **Appendix 56**.

Hard to Reach groups

8.23 RiverOak identified a range of community organisations with a potential interest in the Proposed Development, including representatives of local 'hard to reach' groups.

8.24 To ensure that 'hard to reach' groups were encouraged to get involved in the consultation, the consultation materials were prepared to be accessible and clear. RiverOak also ensured that:

8.24.1 the contact telephone number and email address were prominent on all published material to enable individuals to contact the team directly with questions or requests;

- 8.24.2 RiverOak offered to make the Consultation Leaflet, Feedback Form and Overview Report available in alternative forms on request (e.g. large print, Braille, languages other than English);
- 8.24.3 a Consultation Leaflet and Feedback Form were sent directly to people's addresses within the local area;
- 8.24.4 representatives of the identified community groups and organisations were contacted directly with details about the consultation (details of the organisations contacted are set out in **Appendix 1** to the SoCC); and
- 8.24.5 information was included in the SoCC encouraging anyone with specific additional requirements to contact the RiverOak team by email or phone.

Community Consultation Materials

- 8.25 The following consultation materials were made available throughout the Community Consultation:
 - 8.25.1 Consultation Leaflet (see **Appendix 8**);
 - 8.25.2 Feedback Form (see **Appendix 6**);
 - 8.25.3 Overview Report (see **Appendix 7**);
 - 8.25.4 PEIR Volumes 1-9 (2017 PEIR);
 - 8.25.5 Draft Masterplan for Manston Airport (see **Appendix 9**);
 - 8.25.6 Manston Airport - a Regional and National Asset, Volumes I-IV; an analysis of air freight capacity limitations and constraints in the South East and Manston's ability to address these and provide for future growth (see **Appendix 10**);
 - 8.25.7 Outline Business Case (see **Appendix 11**);
 - 8.25.8 SoCC (see **Appendix 12**);
 - 8.25.9 Location Plan (see **Appendix 13**; and
 - 8.25.10 Interim Consultation Report, setting out the details of the first stage of consultation and how feedback received has been used to help develop the proposals (see **Appendix 14**).
- 8.26 These materials were made available in four ways:
 - 8.26.1 Electronic copies were available on the RiverOak website (www.rsp.co.uk) for the duration of the Community Consultation;
 - 8.26.2 Printed copies were available at consultation events to review and copies of the Feedback Form and Overview Report were available to take away;

- 8.26.3 Printed copies were available at libraries listed in **Table 8.4** below to review and copies of the Feedback Form and Overview Report were available to take away for the duration of the consultation; and
- 8.26.4 USB sticks containing the full suite of consultation materials were available to take away from libraries and consultation events and were available on request.
- 8.27 Due to the size of the 2017 PEIR, it was only available to review in hard form at Deal, Margate and Ramsgate libraries. However the other libraries contained copies of all the other consultation documents including the non-technical summary of the 2017 PEIR.
- 8.28 To ensure the full suite of consultation documentation remained available at the libraries for the whole of the consultation period, the documents at the libraries were checked on a weekly basis by a member of RiverOak’s consultation team. A log evidencing these checks can be found at **Appendix 24**.

Table 8.4: Locations at which Community Consultation documents were available for public inspection

Venue	Opening hours
Birchington Library	Mon, Tue, Thu, Fri: 9am-6pm Sat: 10am-2pm, Wed, Sun: closed
Broadstairs Library	Mon, Tue, Wed, Fri: 9am-6pm Thu: 9am-8pm, Sat: 9am-5pm, Sun: closed
Cliftonville Library	Mon, Tue, Thu, Fri: 9am-6pm Sat: 10am-2pm, Wed, Sun: closed
Deal Library	Mon-Fri: 9am-6pm, Sat: 9am-5pm Sun: 10am-4pm
Herne Bay Library	Mon-Fri: 9am-6pm, Sat: 9am-5pm Sun: closed
Margate Library	Mon, Tue, Wed, Fri: 9am-6pm Thu: 9am-8pm, Sat: 9am-5pm, Sun: closed
Minster-in-Thanel Library	Mon: 2pm-6pm, Tue, Thu: 9am-1pm and 2pm-6pm, Fri: 9am-6pm, Sat: 10am-2pm, Wed, Sun: closed
Newington Library	Mon, Tue, Thu, Fri: 9am-6pm Sat: 10am-2pm, Wed, Sun: closed
Ramsgate Library	Mon-Fri: 9am-6pm, Sat: 9am-5pm, Sun: closed
Sandwich Library	Mon, Tue, Thu, Fri: 9am-6pm,

	Sat: 10am-2pm, Wed, Sun: closed
Westgate Library	Mon, Wed: 9am-5pm, Tue, Fri: 9am-6pm, Sat: 10am-2pm, Thu, Sun: closed

Community Consultation activities

8.29 RiverOak carried out a number of consultation activities throughout the Community Consultation.

Events

8.30 RiverOak held a series of events which were open to anyone to attend and which were advertised in the consultation materials. Visual displays of the proposals were available at all of the events (**Appendix 59**) and members of RiverOak's team attended each event, including legal, environmental, aviation and planning experts, and were available to answer questions from members of the public. **Table 8.5** below sets out the locations, timings and attendee numbers of these events.

Table 8.5: Locations, timings, and attendee numbers of Community Consultation Events

Location	Venue	Date and time	No. attendees
Herne Bay	The King's Hall Beacon Hill, Herne Bay, CT6 6BA	Wednesday 14 June 2pm - 8pm	191
Broadstairs	The Pavilion Harbour Street, Broadstairs, CT10 1EU	Thursday 15 June 2pm - 8pm	170
Cliffsend	Cliffsend Village Hall Foads Lane, Cliffsend, CT12 5JH	Friday 16 June 2pm - 8pm	227
Margate	The Sands Hotel 16 Marine Drive, Margate, CT9 1DH	Saturday 17 June 10am - 2pm	112
Sandwich	The Guildhall Sandwich, CT13 9AP	Tuesday 20 June 2pm - 8pm	165
Canterbury	Abode Canterbury 30-33 High St, Canterbury, CT1 2RX	Thursday 22 June 2pm - 8pm	84
Ramsgate	Comfort Inn Victoria Parade,	Saturday 24 June 10am - 2pm	408

	Ramsgate, CT11 8DT		
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Letters & Emails

- 8.31 Copies of the Consultation Leaflet and Feedback Form were sent to all residential and business addresses within two kilometres of the Proposed Development site, extended in some places to logical boundaries such as main roads.
- 8.32 Emails were sent to those who have previously expressed an interest in the Proposed Development and provided RiverOak with an email address, amounting to 561 email addresses at this stage. Further details of these emails can be found in **Appendix 57**.
- 8.33 Letters or emails were sent to local community groups and organisations who RiverOak were aware were active in the area and for whom RiverOak have contact details (a list of these community groups can be found at **Appendix 16**).
- 8.34 Letters or emails were also sent to elected representatives in the area including MPs, MEPs, Thanet District and KCC councillors (a list of these can be found at **Appendix 16**).

Online

- 8.35 Information about the Consultation was available on the RiverOak website at www.rsp.co.uk and updates were sent using Twitter (@RSPManston) and Facebook (www.facebook.com/RSPManston). RiverOak also produced two videos which were made available on YouTube entitled 'The Case for Manston' and 'How to Participate in the Manston Airport 2017 Consultation'. Further details of these activities can be found in the Media Report at **Appendix 25**.

Press

- 8.36 RiverOak placed advertising in the Isle of Thanet Gazette, Canterbury Times, and the Folkestone Herald and Dover Express (together also known as the 'Herald and Express' series) and Canterbury Times during the week before and during the first week of the consultation. Press releases were also issued to the local press at the start of the consultation and later in the process to encourage participation. Further details of the press releases and press coverage, as well as copies of the newspaper adverts as they appeared in local papers can be found in the Media Report at **Appendix 25**.

Additional Activities

- 8.37 As well as the events discussed in paragraph 8.31 above and detailed in the SoCC. RiverOak carried out a number of additional events at the request of local community groups.
- 8.38 To advertise these events, letters were sent to properties within the relevant parishes prior to each of the events and posters were sent to the relevant Parish Councils (**Appendix 25**).
- 8.39 **Table 8.6** below sets out details of the location, timing and attendee numbers of these events.

8.40 RiverOak also held two additional business briefings where local businesses were invited to attend and discuss the proposals. Details of the location, timing and attendee numbers of these events can be found in **Table 8.7** below.

8.41 A representative of RiverOak also attended a Thanet Business Breakfast club meeting to explain the RiverOak's proposals and to publicise the consultation. Some of the members of the club then attended other events, in particular the business briefings.

Table 8.6: Locations, timings and attendee numbers of additional community consultation events

Location	Venue	Date and time	No. attendees
Minster	Minster Village Hall 1 High Street, Minster Kent, CT12 4BU	Tuesday 27 June 2017 7pm to 9pm	166
Acol	Acol Village Hall The Street, Acol, Kent, CT7 0JA	Wednesday 28 June 2017 7pm to 9pm	48
Birchington	The Centre Alpha Road, Birchington, CT7 9EG	Monday 3rd July 2017 7.30pm to 9.30pm	276
Chislet	Chislet Centre Chislet Parish Church Church Lane, Chislet Canterbury CT3 4DU	Thursday 6 July 2017 7pm to 9pm	81

Table 8.7: Locations, timings and attendee numbers of business briefings

Location	Venue	Date and time	No. attendees
Herne Bay	The King's Hall Beacon Hill, Herne Bay, CT6 6BA	Wednesday 14 June 10am – 11.30am	9
Broadstairs	The Pavilion Harbour Street, Broadstairs, CT10 1EU	Thursday 15 June 10am – 11.30am	16

Consultation Feedback

8.42 Community consultees were encouraged to provide feedback in any of the following ways:

8.42.1 hard copy feedback form which could be posted or returned at a Consultation Event (see **Appendix 6**);

8.42.2 online feedback form via the Proposed Development consultation website, (see **Appendix 26**);

8.42.3 Email to manston@communityrelations.co.uk; and

8.42.4 Letter to PO Box 3297, Bristol, BS1 9LL.

Volume of responses

8.43 The table below outlines the volume of responses received within the consultation timeframe above:

Table 8.8: Volume of responses to Community Consultation

Stakeholder Type	Letters / Email	Online	Feedback form	Total
Local Businesses	4	2	7	13
Community Groups	18	8	5	31
Other members of the local community	379	1132	596	2107
Total	400	1142	608	2151

8.44 Approximately 50 calls were made to the Proposed Development Freephone number prior to, during, and after the consultation. Calls received from stakeholders covered a range of topics, including:

8.44.1 Asking specific questions about the proposal

8.44.2 Registering for business events, public events and meetings

8.44.3 Expressing support and objection to the Proposed Development

8.44.4 Requesting updates on the DCO process

8.45 20 additional community consultation responses (18 from individuals and 1 each on behalf of Kent Wildlife Trust and RSPB) were received after the consultation ended on 23 July. All late responses were dealt with in the same way as community responses received before the deadline. RiverOak has had regard to them in the same way as responses received during the consultation and they have been included in the tables summarising the responses below.

Relevant Responses

8.46 A total of seven questions were asked on the feedback form.

- 8.47 Due to the large number of responses, RiverOak has not included each response individually in this Report but has provided a summary of the responses to each feedback form question in **Tables 8.9 – 8.16** below grouped by issue. The number of times each issue was raised is provided together with an explanation of how RiverOak has had regard to the responses.
- 8.48 RiverOak reviewed each response individually and summarised the issues raised in each response. RiverOak then grouped these summaries together by theme for inclusion in the below tables. To ensure all responses have been taken into account and included in the tables below, each response was allocated a unique number and a record of which consultation response numbers relate to each issue summary has been maintained.
- 8.49 In a small number of cases consultees raised issues in response to a question which more closely aligned with another question. For example, Question 6 of the feedback form asked about night flights, however comments on night flights were at times included in responses to other questions. For clarity where this has happened, the comment has been moved and included in the most relevant question table. However, RiverOak has maintained an audit trail to ensure each response is represented in the tables below.
- 8.50 A number of responses were received which did not use the question and answer structure of the feedback form. As with other responses, these responses were reviewed individually and the issues raised have been included in the table of responses to Question 7 below as Question 7 asked for general comments on RiverOak's proposals.
- 8.51 As community consultation under Section 47 was ongoing when the Section 48 notices were published, responses to both were received within the same deadline. Accordingly, details of relevant responses received from members of the public in response to the publication of the Section 48 notice are also included in the tables below.

Table 8.9: Responses received in community consultation in response to Question 1 of the Feedback Form

Question 1: To what extent do you agree or disagree with our proposals for Manston Airport?

Response	Number of responses	Percentage (%)
Strongly agree	1070	48.13
Tend to agree	82	3.689
No opinion	7	0.3149
Tend to disagree	24	1.080
Strongly disagree	623	28.03
Not answered	417	18.76

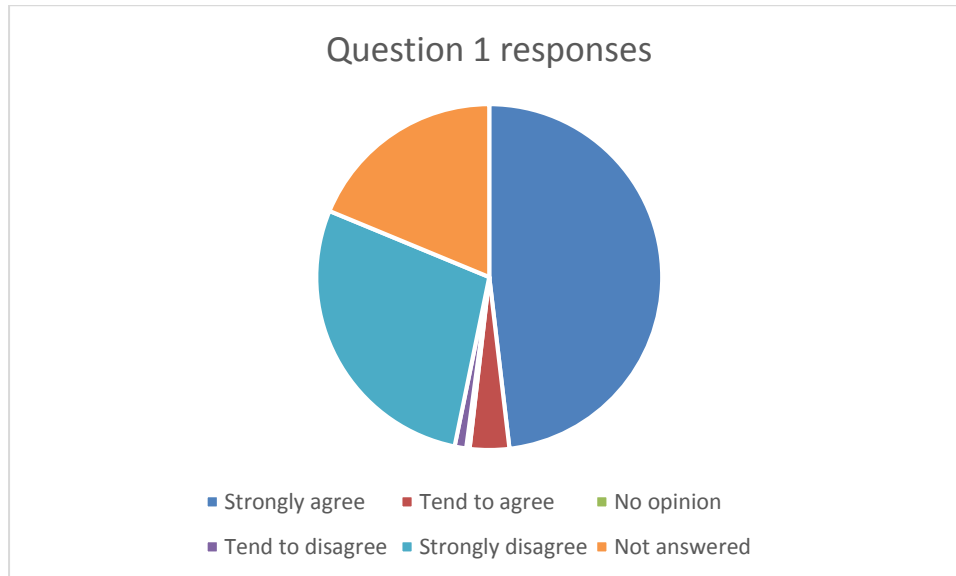


Table 8.10: Summary of issues raised in community consultation in response to Question 2 of the Feedback Form and how RiverOak had regard to the responses

Question 2: Do you have any comments on our Outline Business Case for reopening Manston Airport?

Topic	Issue raised	Change? Y / N	Regard had to response
Business Case	<p>123 respondents expressed their support for the business case and said that it was well thought out, detailed and addressed previous problems.</p> <p>75 respondents challenged the business case due to:</p> <ul style="list-style-type: none"> -lack of detail and effectiveness in addressing opposition -lack of evidence on funding and revenue projections -lies -bias in the presentation of information -inconsistencies -lack of visibility of investors -lack of visibility of projected profits -negative impact on the local population and economy insufficiently addressed. <p>Other respondents raised concerns about the contents of the business case. They highlighted concerns about Brexit (14) and the assumption that moving goods will be costly once the UK leaves the EU (1), and the misalignment between transport and environmental</p>	N	<p>The case for Manston and the funding for it is mainly expressed in three application documents: the Azimuth Report (document reference TR020002/APP/7.4), the funding statement (document reference TR020002/APP/3.2) and the Statement of Reasons (document reference TR020002/APP/3.1).</p> <p>The issue of the UK's withdrawal from the EU has been dealt with in the Azimuth Report. However, since negotiations are still underway, it is not possible to make a definitive analysis of the impacts.</p> <p>The aviation sector continues to make progress in terms of its environmental impact. Modern aircraft are more fuel efficient and less noisy than older models. Lighter airframes, more efficient engines, the use of biofuels, and the potential for battery powered aircraft are a few of the advances made.</p>

	<p>policy (1), the business case being based on the use of oil (2); and challenged the freight figures (34). 50 respondents said that the business case relied too heavily on assumptions and 26 criticised the lack of details and sought clarity on costings or funding. 59 responses were received about the promoters with comments made about their lack of experience and history of developing Proposed Developments like this, concerns about their inexperience and whether they were dishonest about their objectives; and whether the Proposed Development was deliberately set to fail so RiverOak could build housing.1 respondent said that they would support the Proposed Development if the money promised was actually invested.</p> <p>12 respondents said that more information was needed on night flights – they asked for the number of flights, noise levels, and number of flights per night after 20 years of operation.</p> <p>1 respondent asked about the availability of Government funding to support rail and road developments, and what discussion were taking place to obtain it.</p>		
Environmental	<p>188 comments suggested that the reopening would increase pollution and environmental damage. Of that, 24 respondents highlighted that it was a designated area of significant national natural importance, the increased negative impact the airport would have on</p>	Y	<p>The air quality effected resulting from the Proposed Development have been assessed in Chapter 6: Air Quality of the ES (document reference TR020002/APP/5.2-1). The assessment shows that air quality will remain comfortably within legal limits. These legal limits are themselves based on World Health Organization guidance on health effects, allowing for the most vulnerable members of society. The air quality impacts of the airport are small and confined to the</p>

	<p>the ozone layer and that Thanet has some of the lowest tree canopy cover in the whole of the UK.</p> <p>A further 190 comments were received about the impact of noise and 1 about the impact of idling aircrafts. 7 respondents said they would support the reopening of the airport if it had more efficient, quieter aircrafts and 3 would support it if it was built in an environmentally sustainable way, for example using LED lighting, solar panels and the latest noise reduction techniques. 1 respondent said that they would support engine maintenance facilities if the latest noise reduction techniques were used when testing engines at full capacity.</p>		<p>vicinity of the airfield and certain major roads. The impact of air quality on wildlife, ecosystems and biodiversity is assessed in Chapter 7: Biodiversity of the ES and is shown to be not significant. There is some evidence that aircraft emissions can contribute to damage to the ozone layer, but this primarily relates to supersonic aircraft travelling in the stratosphere; such aircraft are no longer in operation and will not result from the Proposed Development. The aircraft movements at Manston will represent well under one-thousandth of global aircraft emissions, which are themselves a relatively small source of potential ozone damage, so any additional impact will be tiny.</p> <p>Requirements for the development of low carbon solutions in the construction and operational phases of the airport are included within Chapter 16 of the ES (document reference TR020002/APP/5.2-2). A commitment has been made to implement a Carbon Minimisation Action Plan. The Design and Access Statement (document reference TR020002/APP/7.3) includes provisions for solar energy, passive heating and cooling, natural light and natural ventilation. Waste will be minimised during both construction and operation, and sustainable materials will be used wherever possible.</p> <p>The Proposed Development will have no effect on tree cover.</p>
Health	<p>69 comments were received about the negative health impacts on residents, for example on physical and mental well-being especially of children, and 3 mentioned the increase in danger/risk to life from falling debris, planes and HGV collisions. 50 comments were received about the health impacts of air pollution. 1 respondent was concerned about how the NHS would cope if there was an accident.</p>	Y	<p>The Health Impact Assessment, Appendix 15.1 of the ES (document reference TR020002/APP/5.2-13) assesses the potential health impacts associated with changes in noise and air pollution. Where adverse effects are predicted, measures to mitigate these are set out in the Noise Mitigation Plan (document reference TR020002/APP/2.4). No significant effect on sleep disturbance is predicted due to the anticipated low number and noise of night-time flights.</p>

	40 respondents mentioned the impact that noise would have on sleep deprivation.		Accidents and disasters have been assessed in Chapter 17 of the ES (document reference TR020002/APP/5.2-3) and road safety / collision data has been assessed in Chapter 14 of the ES (document reference TR020002/APP/5.2-2).
Flights	<p>38 respondents supported passenger flights at the airport or highlighted the economic benefits these would bring to the area, and 47 said that they would benefit local residents by reducing the time taken to travel to an airport.</p> <p>7 said that their support was conditional upon passenger flights being available. A further 5 said that local residents preferred passenger flights to freight. Others asked the promoter to research passenger demand data (2) or when passenger flights would be phased in (3).</p> <p>30 responses supported freight flights at the airport, with some support being conditional upon the Proposed Development moving freight traffic from elsewhere to increase capacity at those airport e.g. Heathrow and Gatwick (2) or not exceeding what is set out in the consultation (1). 15 responses said that this would reduce the number of lorries on the road.</p> <p>Comments were received opposing freight flights, stating that there was already sufficient capacity elsewhere already (57); or that cargo services should be relocated to Richborough (1). 4 respondents said that technological advances would reduce the need for freight provision. 16 respondents were concerned about the number of flights. 8 respondents also</p>	N	<p>RiverOak is continuing with its plan to create a freight-focused airport.</p> <p>Passenger flights form a smaller part of the plan for the airport and are likely to be limited to four Code C aircraft belonging to a low cost carrier flying three or four rotations a day, plus a service to Schiphol Airport at Amsterdam and some seasonal charter traffic.</p>

	<p>expressed concern that operators would not want to use the site.</p> <p>Other suggestions included having an amphibious fleet at the airport (1); chartered flights for folk musicians (1); and flights to Rome, Amsterdam, Prague and Dublin (6).</p>		
Employment	<p>175 respondents suggested that reopening the airport would provide jobs in the local area and help businesses to grow. Others said their support was conditional upon job creation (12) and that opportunities needed to have good terms of employment (1). 1 respondent suggested that the promoter should start any activities not requiring a licence as soon as possible to create jobs at the site.</p> <p>Some respondents were concerned that the Proposed Development may not create as many jobs as anticipated (87), would lead to job losses (5), or that the jobs created would be unsuitable for the local skill set (5).</p>	N	<p>The Azimuth Report (document reference TR020002/APP/7.4) sets out the numbers and types of jobs that RiverOak expects the Proposed Development will create. The author of that report, has been in touch with further and higher education institutions in the area. RiverOak will continue to liaise with these as the project develops to ensure that training and education programmes are brought on-stream as soon as possible after a decision about the Proposed Development has been made. Until there is more certainty about the outcome of the DCO application, it is difficult (if not impossible) for these institutions to access the funds required to instigate or increase aviation-specific training provision.</p>
Education	<p>13 respondents suggested that the reopening would enhance educational opportunities for example apprenticeships, pilots and skills training, and an observation area could be used by schools.</p> <p>17 respondents said that it could have a negative impact on those in education, for example causing interruption to teaching, sleep deprivation, citing research in support and the risk that a plane might crash into a school. 1 respondent suggested that the</p>	Y	<p>The commitment to establishing a recruitment programme with elements tailored to those in local communities who are seeking work but not currently in employment, education or training, if possible in partnership with an educational provider, will aid in maximising the health and wellbeing benefits of employment generation, as discussed in the Health Impact Assessment at Appendix 15.1 of the ES (document reference TR020002/APP/5.2-13).</p> <p>The Noise Mitigation Plan (document reference TR020002/APP/2.4) specifies that reasonable levels of noise insulation and ventilation for schools within the 60 dB L_{Aeq} (16 hour) day</p>

	Proposed Development should include educational provision for and partnership with the local college.		<p>time contour will be provided. No significant effect on sleep disturbance is predicted due to the anticipated low number and noise of night-time flights</p> <p>The risk from aircraft crash in terms of fatality / injury has been assessed and is reported in Chapter 17 Major Accidents and Disasters of the ES (document reference TR020002/APP/5.2-3).</p>
Tourism	110 respondents raised concerns that the proposal would damage tourism in the area, whilst some said that there would be a minimal impact (2) or that it would be good for tourism (2).	N	<p>The effects on tourism are discussed within Chapter 13: Socio-Economics of the ES (document reference TR020002/APP/5.2-2). Tourism receptors in the vicinity of the Proposed Development may experience effects resulting from the increased activity in the geographical area, in both construction and operational phases. For tourism businesses within the surrounding area, the increased visitor numbers associated with the airport operation, in conjunction with increased incomes from employees at Manston, will likely lead to increased demand for tourism facilities and associated spending in the locality. This could result in improvements to their volume of trade.</p> <p>In terms of indirect impacts, such as increased traffic, noise or dust, detailed assessments have been undertaken in Chapter 6: Air Quality, Chapter 12: Noise and Chapter 14: Traffic and Transport of the ES (document reference TR020002/APP/5.2-1 – 5.2-2). The negative effects on tourism are commonly observed to be related to noise and traffic.</p> <p>The effects of noise on tourist businesses will be minimal as the increase in urban areas will be small compared to existing sources. Aircraft noise will increase at the main beach in the centre of Ramsgate which is already subject to urban noise but there will be no noticeable noise increases at any other Kent beaches.</p>

			<p>Outside these areas the effects will depend on existing background levels but in general are considered sufficiently low not to affect the level of business activity or value. The site is well connected by road and rail and traffic increases are assessed to be minimal. The effects of traffic on tourism are considered to be low and will not affect the level of business activity or value.</p> <p>The air quality effects resulting from the Proposed Development have been assessed in Chapter 6: Air Quality of the ES (document reference TR020002/APP/5.2-1). The assessment shows that air quality will remain comfortably within legal limits. These legal limits are themselves based on World Health Organization guidance on health effects, allowing for the most vulnerable members of society. The air quality impacts of the airport are small and confined to the vicinity of the airfield and certain major roads. The impact of air quality on wildlife, ecosystems and biodiversity is assessed in Chapter 7: Biodiversity of the ES (document reference TR020002/APP/5.2-1) and is shown to be not significant.</p>
Community	<p>Comments suggested that the reopening would bring benefits to the local community, providing a socio-economic boost (173) and increasing property values (2).</p> <p>However, 33 respondents said that it would have a negative effect on the area and 124 respondents specifically mentioned the impact it would have on quality of life, especially for those under flight paths. They raised the inability to use outside space; the impact of noise on conversations and TV/radios; not being able to sleep with open windows; and that it was</p>	Y	<p>The effects on tourism are discussed above in this table in response to issues raised relating to tourism,</p> <p>The air quality effects resulting from the Proposed Development have been assessed in Chapter 6: Air Quality of the ES (document reference TR020002/APP/5.2-1). The assessment shows that air quality will remain comfortably within legal limits. These legal limits are themselves based on World Health Organization guidance on health effects, allowing for the most vulnerable members of society. The air quality impacts of the airport are small and confined to the vicinity of the airfield and certain major roads.</p>

	<p>inappropriate for a retirement area. 5 respondents said that it would also put a strain on services (5).</p> <p>45 comments were concerned that house prices would decrease or that it would cause damage to property, and 63 comments were received about the negative impact it would have on businesses and the local economy.</p> <p>15 respondents mentioned the negative impact the airport would have on residents and farmland close to the airport, highlighting farmland leading along the B2050 into Manston and that the helicopter site is too close to the residents of Cliffsend.</p>		<p>Aircraft noise is clearly a concern and is the subject of a Noise Mitigation Plan (document reference TR020002/APP/2.4), which contains commitments to limit and offset the effects of aircraft noise.</p> <p>RiverOak will abide by the national compensation code in relation to property compensation.</p>
<p>Consultation</p>	<p>Respondents commented on the consultation and how the process had been conducted.</p> <p>7 responses said that the consultation had been badly organised, 21 said that there had been no effort to contact residents or that they did not cater for those only available in the late evenings, and 6 suggested that the promoter should consult more widely.</p> <p>2 respondents suggested that events need to be marketed and advertised widely to work and 1 said that consideration was needed on engagement with unaffected residents who were resistant to change. 1 respondent suggested keeping residents updated so that they could open businesses near the site once it was operational.</p> <p>Respondents said that the documents were inaccessible (1), difficult to understand (6), or deliberately misleading/incorrect (4). 3 respondents</p>	<p>N</p>	<p>RiverOak believes the consultation strategy was robust, and this is set out in more detail at Chapter 5 of this document.</p> <p>Local residents were informed about the consultation through multiple methods, including direct mail, adverts in local newspapers and notifications online. The plan for publicising the consultation was set out in our SoCC which was published ahead of the start of consultation.</p> <p>Seven public events were held during the six-week consultation across weekdays and Saturdays. Weekday events were held from 2pm until 8pm to ensure anyone working during the day were able to attend.</p> <p>RiverOak also held four additional evening events in locations across Thanet.</p> <p>RiverOak consulted widely using a range of methods, resulting in over 1,350 attendees at the seven public consultation events and</p>

	<p>were positive about the presentations whilst others suggested how the consultation could be more effective (3), including providing a paid envelope in which to return the form (1).</p> <p>One highlighted local opposition including comments from local councillors and 2 respondents suggested engaging KCC for political support for the Proposed Development and for investment.</p>		<p>over 570 people at four additional evening events. A total of 2,174 responses were received to the consultation.</p>
<p>Impact Assessment</p>	<p>30 respondents said that the impact assessment document had been insufficient or inaccessible, for example about funding, negative impacts, not stating the source for levels of employment, not setting out how impacts had been determined, or for ignoring the economic realities.</p> <p>6 comments said that the information respondents had received had been inconsistent, for example on flight plans, noise, the environment, and impacts on local areas. 1 respondent suggested that an airspace map should have been included.</p> <p>Other respondents asked the following questions</p> <ul style="list-style-type: none"> - how the figure of 10,000 aircraft movements a year was calculated - how many flights an hour this equates to - how many additional lorry movements and other freight related traffic will result - how many lorries will be needed per aircraft 		<p>The EIA process is an iterative process, with documents being refined and additional detail provided with each publication.</p> <p>Three periods of consultation have been undertaken throughout the lifetime of the proposal; the scope of the assessment has been refined and developed as the design has progressed and in light of responses received at each of these consultations, in addition to consultees' comments. In addition, a number of stakeholders have contributed to defining the scope of the development. Additionally, all published reports give due consideration to the latest regulations, guidance and have been produced by competent experts. This belief is based on the environmental consultants' relevant expertise, level of experience and qualifications in preparing ESs.</p> <p>The methodologies for the calculations of figures are set out in the Transport Assessment (document reference TR020002/APP/5.2-15).</p> <p>Although it is the capability of the airport that determines whether it is a Nationally Significant Infrastructure Project, the forecast number of movements for year 5 is a total (freight and passenger) of 15,000, which is 41 per day or around 2 and a half per hour (based on a 16-hour day operating 07.00 to 23.00). This means just over one movement arriving per hour and one departing. By year 10 the</p>

			forecast is for 18,354 movements per year – 50 movements per day, around 1.5 arriving and 1.5 departing per hour. The year 20 forecast is 26,469 per year, equating to around 72 per day, just over 2 arrivals and 2 departures per hour.
Enhancement	<p>37 comments suggested that the existing site should be enhanced, for example by adding a flight school, general aviation, recycling, facilities for private planes/helipad, or a business cluster, and 2 respondents suggested adding a restaurant/viewing area.</p> <p>Respondents suggested either rotating the runway (1) or it crossing from the North Grass (1). 1 response also suggested adding a new entrance on Manston Court Road.</p> <p>There was support for cold storage so that products could be stored appropriately if night flights could not be secured (1), but 6 respondents said that any warehousing should be built away from residential areas.</p> <p>Respondents said that infrastructure on the site should be built in a well-planned way (6). 1 respondent said that their support was conditional upon the addition of an air show at the site</p>	Y	<p>The capability and flexibility, in terms of infrastructure, is planned at present to assist flight school, general (private) aviation operational development at Manston. The existing fixed based operator building is being retained on the current masterplan layout and this is planned to be extended with additional hangars and apron space.</p> <p>RiverOak has considered whether to rotate the runway away from Ramsgate. However, it is not feasible to realign the runway. A subtle alteration of the runway orientation would only displace any effect/disturbance of flight (airborne) noise to other communities or sensitive areas while also resulting in a significant change in the airport boundary and scope of the planned engineering works.</p> <p>A large reorientation of the runway alignment would negate the main benefit of the site re-use of the existing runway asset is a key part of the proposals. Runways are also typically aligned to take advantage of predominant wind directions, for the UK this results in primary runways being in an east / west configuration as at Manston.</p> <p>The airport would have the physical capability to host an air show, if operations and timetabling of flights allows it.</p> <p>RiverOak supports air shows in principle but points out that they are not compatible with the operation of a busy airport. Ultimately the decision would lie with the CAA.</p>
Operational	20 respondents said that the runway should be available for emergency or humanitarian use.	Y/N	When the airport reopens, the runway would be available for emergency or humanitarian use. Manston Airport has a history of facilitating humanitarian and aid flights and the forecast shown in

	<p>2 comments raised uncertainty about fuel supply logistics and 2 respondents said that their support was conditional on the airport not including an aircraft teardown and recycling facility. One respondent stated opposition to the proposed 'scrapping' (MRO) facilities.</p> <p>Respondents gave conditional support for the reopening if newer navigation and landing technology was used (2) or if fire training did not involve the propagation of black clouds (2).</p>		<p>Volume III of the Azimuth Report (document reference TR020002/APP/7.4) includes this category of flight.</p> <p>Modern Communication, Navigation and Surveillance (CNS) procedures, techniques and equipment would be utilised at the reopened / regenerated airport. There are no plans to develop a live fire training facility at Manston Airport.</p> <p>The Fuel Farm will be supplied by road tanker. A robust assessment has been made and justified within the Transport Assessment (document reference TR020002/APP/5.2-15). It should be noted that tankers will be supplying Fuel Farm tank storage.</p> <p>Details of the Recycling Facility Operations are included in the DCO submission. These are planned to operate in an enclosed space and have been assessed within the DCO submission.</p>
Access	<p>10 respondents said that there was good road and rail access to the airport. Others said that additional infrastructure or improvements were or would be needed (33), for example at Spitfire Junction, Manston Village, the A2/299, to support rail freight and widening the M2/M20.</p> <p>Respondents also raised concerns about traffic through Manston Village (1), motorway connections (7), congestion (51), and how local transport links would cope (54). 1 respondent said that the location was unsuitable due to the lack of rail connection.</p> <p>4 comments were received about HGVs damaging roads and 12 said that a depot was needed. 5 respondents said that the local community must be</p>	Y	<p>The road links that the airport currently has access to will, where necessary, be improved and enhanced to allow for the convenient access to the site for car users but also for those wishing to use public transport or walking/cycling. This will include additional infrastructure such as road widening, new pedestrian routes and enhanced public transport services.</p> <p>Manston village is regarded as a sensitive location for traffic and the signed route to the site will be from the A299 and not via Manston. The Transport Assessment (document reference TR020002/APP/5.2-15) sets out the proposals for traffic movements on the local highways network as a result of the proposals and from this no improvements are proposed in Manston village.</p> <p>The Construction Traffic Management Plan (Appendix K at document reference TR020002/APP/5.2-25) sets out the need for dilapidation surveys for the construction period to make sure that any damage caused to the road or verges by construction HGVs is</p>

	kept informed of any traffic mitigation measures being put in place.		managed and repaired. Details related to all the comments above are set out in the Transport Assessment.
Alternative use	86 responses supported the site being reopened as an airport as opposed to the site being used for housing. 82 others said that it should be used in another way, with respondents specifying support for housing (26), manufacturing/industrial (3), mixed use (13) and alternative plans proposed by Stone Hill Park (30). 10 respondents suggested that the site should be used for something else but did not specify for what.	N	RiverOak believe that reopening this historic site as a successful airport is the best recognition of its past and hope for its future
Strategic value	Responses highlighted the strategic advantages of reopening Manston airport given the facilities it has (60) e.g. lower airspace radar surveillance facilities and long runway; the impact of Brexit and the subsequent increased need to trade more with non EU countries (43); the positive location (29); and the opportunity to help with aviation capacity issues (152). Respondents also commented on the importance of the history and heritage of the site as well as it being a key defence asset (19). However, others said that the airport was poorly located (73), too big (2) or unable to compete or make a profit (14).	N	RiverOak agrees that the site has strategic advantages as an airport. The airport benefits from its location in the South East where demand is highest, a long runway, and relatively uncongested airspace. The site is suitable for a cargo airport because it is connected by a dual carriageway to the M25 and beyond. RiverOak's proposals are phased so will not be too big compared with demand.
Viability	106 respondents raised concerns about the viability of the site, with additional comments being received about its unsuitable location and lack of viability (15) or its prospects if it was to operate without night flights (15). 6 comments said that TDC had previously found the site to be unviable.	Y	The Azimuth Report (document reference TR020002/APP/7.4) provides a detailed case for the reopening of the airport. It is clear that the UK needs additional airport capacity. The evidence shows that air freight is particularly vulnerable to capacity constraints not only in the UK but also in Europe (see the Schiphol Airport example). Manston Airport zoned for aviation use, can provide some of the much-needed capacity almost immediately. RiverOak's planned

			<p>investment in the airport would provide state-of-the-art facilities for freight, addressing many of the current difficulties experienced by freighter operators.</p> <p>RiverOak recognises that night flights are a concern and is therefore proposing a night time policy which imposes movement limits combined with measures to reduce noise. Further information can be found in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4).</p>
Support	285 respondents said that the airport should open as soon as possible or that it should never have been closed.	N	RiverOak notes and welcomes this response.

Table 8.11: Summary of issues raised in community consultation in response to Question 3 of the Feedback Form and how RiverOak had regard to the responses

Question 3: Do you have any comments or suggestions about how we could maximise the social and economic benefits of reopening Manston Airport?

Topic	Issue raised	Change? Y / N	Regard had to response
General Support	<p>217 respondents expressed their general support for the Proposed Development with comments ranging from 'Be successful' to voicing a preference for RiverOak's plans over those of the current owner.</p> <p>One respondent stated that the only people who opposed the Proposed Development were those who were new to the area or who were linked to current owners, one respondent stated that the opposition had links to the local Labour Party, one respondent suggested naming the terminal after Sir Roger Gale, and one respondent suggested that the whole area be developed into a single urban conglomeration so that the airport had a bigger population it could serve.</p> <p>148 respondents expressed that the airport had a lot of potential and that it would bring general benefits to Thanet and East Kent.</p>	N	<p>RiverOak is grateful for the continuing support from a significant part of the public in Thanet and understands the place that Manston has in the affections of many local residents.</p> <p>General benefits of the Proposed Development are discussed upon a topic by topic basis within the technical Chapters of the ES (document reference TR020002/APP/5.2).</p>
General Opposition	<p>174 respondents expressed their general opposition to the Proposed Development with comments ranging from 'The airport should not reopen' to 'An airport at Manston is not viable'.</p>	N	<p>RiverOak believes that a re-opened airport will benefit the entire community and that its apparent lack of viability in the past stems from the failure of previous owners to invest in the infrastructure necessary to support profitable levels of traffic.</p>

	<p>237 respondents commented that the airport would either not benefit the local area or that any negative social impact would outweigh any economic benefit.</p>		<p>Any adverse effects arising from the Proposed Development are discussed upon a topic by topic basis within the technical Chapters of the ES (document reference TR020002/APP/5.2). Appropriate mitigation to reduce any adverse effects is also provided within the ES, its appendices and a suite of additional documents including the Noise Mitigation Plan (document reference TR020002/APP/2.4).</p>
<p>Alternatives</p>	<p>155 respondents voiced a preference for alternatives, both for the site and for where such an airport should be based. 3 people suggested Gatwick or Stansted should be expanded instead, 1 person suggested that a freight airport would be better in the centre of the UK, and a further 147 respondents suggested other uses for the site, ranging from a mixed use development to a small leisure airfield or a nature reserve.</p> <p>2 respondents suggested the money be used instead to invest in cycle funds, whilst 2 respondents suggested the UK should prioritise its own resources rather than imports.</p> <p>39 respondents commented that the current owner's plans for the site are best and one person commented that development of tourism and infrastructure will give greater economic impact than an airport.</p>	<p>N</p>	<p>We believe Manston to be ideally situated for a cargo-based airport as it is in the south-east and has dual carriageway or better links to London and beyond.</p> <p>The Azimuth Report, Volume 1 (document reference TR020002/APP/7.4), considers all other options in the South East for development of an air freight hub. None are considered capable of hosting the type of operation proposed by RiverOak.</p> <p>An airport operation provides a number of economic and social benefits including creating direct, indirect, induced and catalytic jobs, providing connectivity, attracting inward investment and foreign direct investment, and facilitating export and import activity.</p>
<p>Community assets</p>	<p>71 respondents made suggestions about what the airport could do to increase its position as a community asset. The suggestions included the opening of a visitors' centre and having a social meeting place for local residents. Two respondents also stated that residents should accept some discomfort.</p>		<p>We will to consider these proposals as part of the airport consultative committee's work and would certainly not rule them out at this stage.</p>

	24 respondents made suggestions about onsite facilities. These generally related to supporting or putting on air shows and catering for plane spotters on site, but there was also one suggestion that a specialist equine centre be provided.		
Community involvement	40 people made suggestions about how to involve the community in the Proposed Development. Suggestions ranged from engaging air cadets and youth groups to offering airport shares to locals and holding a competition for a memorial sculpture. One person also suggested closer working with KCC and the Department for International Trade.	N	RiverOak is already committed to setting up an airport consultative committee, to be chaired by an independent person and to be properly representative of the airport community. The details of this can be found in the Noise Mitigation Plan (document reference TR020002/APP/2.4).
Housing and infrastructure	5 respondents commented on the need for supporting social infrastructure (housing, schools etc.) to be provided should the airport re-open.	N	These comments are not a matter for the Proposed Development itself but for the Local Authority, however, the issue of housing is considered in Appendix 6 of the Planning Statement (document reference TR020002/APP/7.2). The Manston site is zoned for aviation use and reopening the airport will provide much needed employment opportunities in an area of relatively high deprivation. The Azimuth Report (document reference TR020002/APP/7.4) provides details of the case for reopening the airport in some depth and finds that there are no other airports that can be used to reduce the impact of UK airport capacity constraints on the freight market.
Quality of life	82 respondents commented that the Proposed Development would have a negative effect on quality of life for local residents. Effects mentioned include impact on community and social life, impacts on children's health and derelict aircraft and scrap becoming an eyesore.		The Proposed Development would affect wellbeing or quality of life for local residents both positively and negatively, through environmental effects from noise and traffic and from the beneficial social effects of employment and local supply-chain spending. The socio-economic and health Chapters of the ES (13 and 15) have more details (document reference TR020002/APP/5.2-2).

Heritage and buildings	24 respondents commented that there would be an impact on the heritage and character of the area as well as on physical buildings in the area, in particular to the listed buildings in Ramsgate. One respondent stated that cargo flights would prohibit the Herne Bay Air Show from going ahead.	Y	<p>RiverOak's application to the CAA in the airspace change process (ACP), would emphasise the willingness to prioritise flights coming from and going to the west dependent upon weather conditions and operational (schedule) intensity. This priority in flight operation would be monitored to ensure the maximum reduction where operationally possible in the effect of noise disturbance on Ramsgate.</p> <p>Impacts on heritage assets have been assessed and are reported in Chapter 9: Historic Environment of the ES (document reference TR020002/APP/5.2-1). The assessment process has been undertaken in line with relevant policies and legislative requirements (see Chapter 9: Historic Environment, Section 9.2) and appropriate mitigation measures are proposed in Sections 9.8-9.10 of Chapter 9: Historic Environment. The assessment includes consideration of indirect effects on off-site designated heritage assets with the potential to be affected, including listed buildings in Ramsgate (Chapter 9: Historic Environment, Section 9.10 and Appendix 9.1 (document reference TR020002/APP/5.2-8 and 5.2-9)).</p> <p>Operations at the airport would not necessarily inhibit the Herne Bay Air Show; however airport operations and Air Show activity would require close coordination and deconfliction as demanded by the CAA. Careful and sympathetic timetabling of flights would allow simultaneous airport operation and Air Show activity.</p>
Property values & Damage	6 respondents commented on the fact that house prices will fall as a result of being under the flight path, but that other house prices will rise as more people move into the area. An additional 2 respondents stated only that the value of property would increase as more people move to Thanet.	N	<p>The Noise Mitigation Plan (document reference TR020002/APP/2.4) includes a Wake Turbulence Policy: Wake Turbulence is caused by spiralling movements of air from each wingtip on an aircraft. These movements are known as wake vortices and they trail behind the aircraft and descend as they rotate. Normally vortices will dissipate in the air. However, on very rare occasions the vortices can strike roofs caused tiles to become displaced in the</p>

	3 people were concerned about planes descending too low over the town and causing damage through destroying roofs and plastering.		immediate vicinity of the airport. Wake turbulence damage is usually verified by the pattern of damage. Only traditional slate or tiled roofs can be damaged and this type of damage is usually in the centre of the roof. The tiles are usually lifted and rotated, unlike damage usually caused by bad weather or winds.
Consultation	17 people commented that the people of Ramsgate had not been accounted for in the consultation.	N	The consultation was widely advertised through a variety of methods. See section 7 for details on how we publicised the consultation. Ramsgate was the most popular of the seven public consultation events held during the consultation.
Site enhancements	<p>75 people suggested improvements to the Proposed Development masterplan. Suggestions ranged from re-aligning the runway to including an Air Accident Investigation branch on site.</p> <p>13 people suggested operational enhancements on the airport site:</p> <ul style="list-style-type: none"> - quick turnaround of cargo and passengers (1) - use of solar panels, water capture and ground source heat pumps (1) - operate in a way that offsets carbon footprint (1) - use airport for defence purposes (1) - use other forms of transport e.g. airship, dirigibles with electric propulsion (3) - keep airport and surrounds looking tidy (3) - consider development of Air Accident Investigation Team (1) - Encourage presence of RAF Reserve unit (2) 	Y/N	<p>RiverOak has considered whether to rotate the runway away from Ramsgate. However, it is not feasible to realign the runway. A subtle alteration of the runway orientation would only displace any effect/disturbance of flight (airborne) noise to other communities or sensitive areas while also resulting in a significant change in the airport boundary and scope of the planned engineering works.</p> <p>RiverOak welcomes the suggestions for site enhancements and whilst it cannot, at this time, confirm that these will be incorporated, it can confirm that they will be considered.</p>

<p>Economic benefits</p>	<p>92 respondents commented on the economic benefits that the Proposed Development would bring, including 84 respondents who suggested that such economic benefits would lead to less reliance on welfare and would help Thanet to become self-sufficient.</p> <p>21 respondents suggested that the airport should encourage local businesses in various ways, from offering helicopter rides to attract potential businesses to the area to encouraging local businesses to use the airport for export.</p> <p>66 respondents commented in general on the fact that the Proposed Development would have undesirable economic impacts on the local area.</p>	<p>N</p>	<p>RiverOak agrees that there are considerable economic benefits associated with the re-opening of the airport, which are discussed within Chapter 13: Socio-Economics of the ES (document reference TR020002/APP/5.2-2). RiverOak has considered these comments and is willing to support a range of initiatives to ensure that local businesses benefit from the success of the airport.</p>
<p>Tourism</p>	<p>69 respondents commented that the Proposed Development would have benefits on local tourism with 3 of these respondents specifically mentioning the increased tourism this would bring to the local museums. One person commented on the long connection of the airport with the American Airforce.</p> <p>35 respondents suggested ways in which tourism benefits could be extended and/or improved. Suggestions ranged from opening a travel agent at the airport to having airport open days.</p> <p>84 respondents commented that the Proposed Development would destroy tourism in Thanet and one respondent state that passenger flights would not benefit tourism in Thanet as nobody will want to use</p>	<p>N</p>	<p>RiverOak agrees that tourism will increase if the airport reopens for some passenger flights, as evidenced by airports such as Southend, Southampton and Bournemouth. The potential impact of the Proposed Development on tourism is discussed in further detail in Chapter 13 of the ES (document reference TR020002/APP/5.2-2).</p> <p>RiverOak is creating a consultative committee whose remit will include maximising community involvement in the life of the airport. RiverOak will also work with Visit Kent and other local inbound tourism organisations as well as passenger airlines based at Manston to promote East Kent and the entire region as a visitor destination.</p>

	the airport. One further respondent asked that an impact assessment on tourism be carried out.		
Passenger flights	<p>159 respondents expressed their support for passenger flights from Manston airport, including support for helicopter, private aviation facilities and chartered flights for musicians and VIPs, with 24 respondents stating that all or some of the above would reduce reliance on other airports e.g. Gatwick and Heathrow. Most responses related to a preference for flights to holiday destinations or as part of wider international aviation e.g. through connections at Schiphol airport, but there was also mention of domestic flights. However, four respondents stated that local residents are too poor to use the airport.</p> <p>Four people commented that there should only be passenger flights as these are quieter than freight flights and one person suggested that the airport should supply a Freephone taxi number.</p>	N	RiverOak is already including passenger facilities in the plans, although the focus of the airport will be cargo flights. RiverOak's expectation is that a low cost carrier will base a small number of aircraft at Manston and will fly to destinations in Europe. The carrier will determine which destinations would be the most popular. The plan is also for a double daily service to a major European hub offering onward connections to global destinations,
Education and training	190 respondents expressed support for education and training opportunities for local people. This included assertions that the airport would inspire educational achievement in the local area as well as suggestions that the airport should work with, and invest in, local schools, colleges and universities to encourage apprenticeships and training. 13 respondents suggested building educational / training facilities at the airport itself with a further 5 suggesting that there should be flight crew training opportunities.	Y/N	<p>Thanet has ongoing problems associated with deprivation including relatively high unemployment, low wages and low participation in higher education and continues to rank as the most deprived Local Authority in Kent. Figures published by DCLG ranked Thanet as the 28th out of 326 most deprived area in England in 2015, the second poorest Local Authority area in the South East, and the poorest in Kent.</p> <p>Despite benefiting from considerable EU funding over a number of years, Thanet continues to lag behind other Kent areas on all key economic indicators. A successful operational airport will provide a</p>

			<p>considerable number of jobs across a range of skills and educational levels. RiverOak is continuing to engage with local further education (FE) and higher education (HE) providers to ensure local people can access the training and education necessary to gain employment with the airport operator and with associated organisations at and around the airport.</p> <p>Further information on training and employment opportunities are discussed within Chapter 13 Socio Economics of the ES (document reference TR020002/APP/5.2-13).</p>
Employment	<p>354 respondents commented that Thanet/East Kent is a deprived area and that in order to contribute to the area there is a need for the airport to employ local people both during the construction and operational phases. 39 people stated that the jobs must be highly paid and skilled with training given if necessary.</p> <p>One respondent stated that press coverage of job creation should be maximised.</p> <p>51 people commented generally about the positive impact on employment that the Proposed Development would bring to the area. 15 respondents specifically commented that employment must be long-term, sustainable and secure and 12 respondents suggested that jobs be provided at all levels, from unskilled to highly skilled.</p> <p>53 respondents raised concerns about the employment that the Proposed Development would bring to the area. Concerns were raised about:</p>	Y/N	<p>RiverOak undertakes that training opportunities will be developed for young people living locally and that, subject to the operation of law, priority will be given to local people in terms of job opportunities and recruitment. Effort will be made to ensure local people gain access to jobs at and around the airport in airport-related businesses. The construction phase is also likely to make use of local people and there is expected to be a knock-on effect in the local supply chain. Jobs will be created with the need for a wide range of skills including engineering and other high tech employment. RiverOak would work with local providers to ensure that the need for these skills locally would be matched by education and training provision by local HE and FE institutions.</p> <p>Press coverage of the job creation and the associated provision of training would be most welcome and will be one of many ways RiverOak will advertise jobs.</p> <p>The Azimuth Report (document reference TR020002/APP/7.4) provides further details about how these benefits will be realised as well as providing details of how the job forecasts have been calculated.</p>

	<ul style="list-style-type: none"> - no details being given about how jobs figures will be calculated (6) - 'outsiders' doing all the jobs (11) - more job losses than job gains (9) - no good jobs for local people (16) - legislation preventing positive discrimination for jobs for locals (1) - lack of skilled local workforce and the need for employees to come from outside (9) - jobs coming from alternative industries instead (1) - the employment figures given being unrealistically high (34). 		<p>Airports employ people with a wide range of skills. Many of these jobs will be long-term, sustainable and secure with perhaps the addition of some seasonal work. Skills required include those for jobs as ground handlers, aviation specialists, engineers, passenger services, cleaners, caterers and many more.</p> <p>Further information can be found in Chapter 13 Socio Economics of the ES (document reference TR020002/APP/5.2-1).</p> <p>Volume IV of the Azimuth Report (document reference TR020002/APP/7.4) compares other coastal areas (Southend, Southampton and Bournemouth) and the impact of their airport operation on tourism. No adverse effect was found and indeed the operation of the airport, from these examples, suggests that tourism would increase if Manston Airport were to reopen with a successful operation.</p>
Environmental impact – general	<p>32 respondents raised concerns about the damage the Proposed Development would do to the environment through pollution. 16 respondents stated that the environmental damage would outweigh any economic benefit.</p> <p>1 person commented that the pollution from the Proposed Development would be less than the pollution from the proposed housing development by the current owners.</p>	Y	<p>Significant effects resulting from the Proposed Development are outlined upon a topic by topic basis within the technical Chapters of the ES (document reference TR020002/APP/5.2-1). Discussion of and proposed mitigation measures relating to any potential adverse effects can also be found within these Chapters.</p>
Environmental Mitigation	<p>9 people provided general suggestions about how to mitigate the impact on the environment:</p> <ul style="list-style-type: none"> - design the airport with minimal effect to the coast / beaches (1) 	Y	<p>RiverOak is introducing fines for aircraft that stray from approved flightpaths as part of our Noise Mitigation Plan and is also taking steps to limit the impact of night flights.</p>

	<ul style="list-style-type: none"> - ensure flights keep to designated flight paths (1) - reduce number of flights (2) - delay airport for 10 years (1) - establish airport gradually (3) - establish strong contingency plans for operation (1) 		<p>The Proposed Development will build upon the existing site facilities and demand which is forecast for the region. A significant delay to the development would negate this.</p> <p>The airport is proposed to be developed gradually and in phases. The exact development of the site will proceed on a demand led basis but provisional phasing drawings (document reference TR020002/APP/4.14) are provided as part of the DCO submission.</p> <p>RiverOak is introducing fines for aircraft that stray from approved flightpaths as part of its Noise Mitigation Plan (document reference TR020002/APP/2.4).</p>
Water supply	<p>1 respondent was concerned about possible contamination and damage that might be done to the water table and Manston aquifer. A further respondent raised the issue of potential mosquito infestation as a result of the attenuation ponds.</p>	Y	<p>The Hydrogeological Impact Assessment (Appendix 8.1 to the ES) (document reference TR020002/APP/5.2-7) includes an assessment of the risk to the groundwater environment (including the water table and Manston aquifer) from activities and suggests appropriate measures to mitigate potential effect during the construction phase. These are included in the CEMP (Appendix 3.2 of the ES, document reference TR020002/APP/5.2-6) and will be implemented in the construction phase / incorporated into the site's design.</p> <p>Proposed mitigation is discussed further in the mitigation section of Chapter 8: Freshwater Environment in the ES (document reference TR020002/APP/5.2-1). As stated in Chapter 8 Freshwater Environment of the ES, water treatment will take place on site in attenuation ponds and water will only be pumped to the discharge pipe from these ponds once appropriate quality standards are reached.</p> <p>It is proposed that there are two ponds on site, one of which will receive 'dirty' run-off (e.g. that containing de-icer) and one receiving 'clean' run-off. Water will only be discharged from the 'dirty' run-off</p>

			<p>pond once treatment is complete and pumped discharge will only take place from the 'clean' pond.</p> <p>These ponds will be sized to take account of the capacity of the pipe and pump and will appropriately consider the February 2016 update to the National Planning Policy Framework (NPPF) climate change allowances.</p> <p>Further details are included in the outline Site Drainage Plan (Appendix A of Appendix 8.2 Flood Risk Assessment of the ES, document reference TR020002/APP/5.2-8).</p>
Health	83 people raised concerns about the impact of the airport on health. There was particular concern about harm being caused to children's learning and development and that night flights would lead to sleep deprivation. Of these, 14 respondents were also concerned that life expectancy would be reduced.	Y	<p>The Health Impact Assessment, Appendix 15.1 of the ES (document reference TR020002/APP/5.2-13) and Chapter 15 of the ES (document reference TR020002/5.2-2) assesses the potential health impacts associated with changes in noise and air pollution. Where adverse effects are predicted, measures to mitigate these are set out in the Noise Mitigation Plan (document reference TR020002/APP/2.4). The Noise Mitigation Plan specifies that reasonable levels of noise insulation and ventilation for schools within the 60 dB L_{Aeq} (16 hour) day time contour will be provided. No significant effect on sleep disturbance is predicted due to the anticipated low number and noise of night-time flights.</p>
Wildlife & Biodiversity	9 people raised concerns about the impact on wildlife, 6 of whom suggested that a reserve be created to offer a place for such wildlife to thrive.	Y	<p>Due to the nature of the development (an airport) impacts upon biodiversity are to be mitigated offsite through the provision of compensation land managed and enhanced for the biodiversity impacted on Site. Natural England has been consulted.</p> <p>For further information, refer to Chapter 7: Biodiversity, Section 7.5 of the ES (document reference TR020002/APP/5.2-1).</p>

Air quality	<p>20 respondents raised concerns about the impact of the Proposed Development on air quality.</p> <p>In addition to those who commented that aircraft would have an impact on air quality, 10 respondents stated that the additional vehicles on roads would cause pollution.</p>	Y	<p>The air quality effects resulting from the Proposed Development have been assessed in Chapter 6: Air Quality of the ES (document reference TR020002/APP/5.2-1). The assessment shows that air quality will remain comfortably within legal limits. These legal limits are themselves based on World Health Organization guidance on health effects, allowing for the most vulnerable members of society. The air quality impacts of the airport are small and confined to the vicinity of the airfield and certain major roads. The impact of air quality on wildlife, ecosystems and biodiversity is assessed in Chapter 7: Biodiversity of the ES (document reference TR020002/APP/5.2-1) and is shown to be not significant.</p>
Noise	<p>8 respondents expressed the view that there would be no issue with noise pollution with 2 respondents stating that any potential noise from aircraft would be less than the noise from a potential housing development.</p> <p>68 respondents raised concerns about noise pollution from freight aircraft and road traffic and expressed concern that not enough assessment of the potential impacts was provided in the consultation materials. Suggestions were made about how the impact could be mitigated:</p> <ul style="list-style-type: none"> - Re-align the runway to reduce the noise over built-up areas (1) - Set up an acoustic wall on the runway to limit noise and reassure residents (1) - Buildings should be soundproofed (2) - Grants to pay for residents triple-glazing (1) 	Y	<p>A large reorientation of the runway alignment would negate the main benefit of the site re-use of the existing runway asset is a key part of the proposals. Runways are also typically aligned to take advantage of predominant wind directions, for the UK this results in primary runways being in an East / West configuration as at Manston.</p> <p>A subtle alteration of the runway orientation would only displace any effect/disturbance of flight (airborne) noise to other communities or sensitive areas while also resulting in a significant change in the airport boundary and scope of the planned engineering works</p> <p>A buffer zone and landscaped areas have been allowed between the Proposed Development and residential receptors. There is potential for acoustic walls, bunding and other measures to be incorporated as necessary into the design although detailed proposals cannot be defined at this stage. A noise assessment has been undertaken as part of the DCO submission and mitigation measures will be developed in line with this philosophy.</p> <p>RiverOak is proposing a night time policy which imposes movement limits combined with measures to reduce noise. Further information</p>

			can be found in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4).
Transport and surface access	<p>25 respondents commented in general terms that there is a need for additional transport infrastructure in the South East and that an airport in Thanet would ease road congestion from trucks from the continent. One person suggested that manufacturing should be located close to the airport in order to reduce transport time, and one person expressed their surprise that the government has not considered the fact that the mainline train line is less than one mile from the airport site.</p> <p>31 respondents raised concerns about the road and rail infrastructure network in the area not being able to cope with the Proposed Development.</p> <p>107 respondents provided suggestions about how surface access to the aircraft can be improved upon e.g. through improved links to docks and ports, as well as through rail upgrades. Suggestions also included proposals for linking up local docks and railways to provide even greater economic benefits. In particular, 13 respondents referenced Thanet Parkway station and 14 commented on the need for the local road network to be upgraded. One respondent suggested that manufacturing businesses be encouraged to locate to the nearby business parks in order to reduce transportation.</p>	Y	<p>RiverOak agrees that reopening Manston Airport for cargo will reduce dependence on the Channel Tunnel by freight and will also reduce congestion there. RiverOak believes that this will be particularly pertinent after the UK's exit from the European Union when delays at the Channel crossings may lead to considerable problems for businesses engaged in transporting perishable items. The presence of an airport is a key driver for inward investment and for businesses deciding to locate in an area. As such, an operational Manston Airport is likely to attract organisations in manufacturing to the area. The Azimuth Report (document reference TR020002/APP/7.4) provides further information on this topic.</p> <p>RiverOak has carried out a Transport Assessment (document reference TR020002/APP/5.2-15) that demonstrates that the local road network, with RiverOak's proposed enhancements to it, will not worsen due to the proposals. An Airport Surface Access Strategy (Appendix O of the Transport Assessment) has been prepared setting out detailed surface access measures proposed to improve the connectivity of the site.</p> <p>RiverOak is proposing to provide considerably enhanced freight handling facilities at the airport. RiverOak welcomes plans for a new railway station to the south-east of the site although they do not form part of its own proposals due to the station currently only being an aspirational development. If such a station is developed in the future RiverOak will consider how best use could be made of it for freight and passengers.</p>

			An Airport Surface Access Strategy (Appendix O of the Transport Assessment) has been prepared setting out detailed surface access measures proposed to improve the connectivity of the site.
Consultation and engagement	<p>37 respondents asked that RiverOak keep the public and local residents informed of the progress being made, and suggestions were made about the use of local media to do this. 1 respondent suggested that the potential airport customer base be consulted;</p> <p>1 complained that no information about the Proposed Development was received; and 1 suggested that every dwelling under the flight path should have been consulted.</p>	Y	<p>RiverOak will be sure to keep the local community informed about the plans as they develop, and will create a consultative committee of local representatives to assist with this. RiverOak will also develop and maintain a News page on their website.</p> <p>As set out in this Report, RiverOak believes its three stage consultation was robust and had an appropriate reach.</p>
Consultation materials	<p>10 respondents stated that more information was needed on the following:</p> <ul style="list-style-type: none"> - night flights - financial backing - how fuel will be stored or transported - flight path location - property price impact - examples of job supply with case studies of other small airports. One respondent stated that insufficient information had been provided on the potential socio-economic damage of the airport on Ramsgate; one person commented that, due to the gaps in information given, they were sceptical that RiverOak would adhere 	Y	<p>RiverOak's application contains the following documentation which addresses each of these concerns:</p> <ul style="list-style-type: none"> - Noise Mitigation Plan (document reference TR020002/APP/2.4); - Funding Statement (document reference TR020002/APP/3.2); - Chapter 3 and 13 (specifically) of the ES (document reference TR020002/APP/5.2-1 and 5.2-2); and - Azimuth Report (document reference TR020002/APP/7.4) <p>The environmental assessment is based on swathes of potential flightpaths, and an airspace change proposal will be made to the Civil Aviation Authority for flight paths within those swathes.</p>

	to environmental controls, and one person commented that RiverOak did not own the freehold.		
Safety	One respondent commented that the type of aircraft to be used at Manston are not safe.	N	Operations at Manston Airport will be bound to comply with International Civil Aviation Organisation (ICAO), E ASA and State (UK CAA) regulations which will not allow unsafe aviation operations. Manston (and operators that fly to and from Manston) will be required to remain compliant with such regulations and will be subject to a robust programme of audits and evaluations.
Other airports	17 respondents specifically stated that expansion at Manston would reduce the pressure on Heathrow and reduce the need for an extra runway there, whilst one respondent stated that residents will still be better off using Gatwick and other airports for travelling.	N	<p>The vast majority of freight passing through Heathrow is carried as belly freight (in the hold of passenger aircraft). For example, in 2016, 1,457,192 tonnes were carried as belly freight compared to 83,837 tonnes in dedicated freighters. In terms of air traffic movements, Heathrow handled 470,747 passenger air traffic movements (ATMs) and 2,452 cargo-only ATMs in 2016. The proposed addition of a third runway at Heathrow is unlikely to be operational until at least 2030. By this time, the likelihood is that Low Cost Carriers, who do not usually carry belly freight, will fill much of the third runway's capacity. Consequently, a new runway at Heathrow may not resolve the capacity issues for dedicated freighters.</p> <p>Clearly the journey time to Manston is much quicker than the journey time to Gatwick for local people although Manston will not provide the wide range of routes available from Gatwick or Heathrow. However, the presence of a scheduled carrier such as KLM would provide access from Thanet to the rest of the world via the airline's hub. Some people would find it easier to access Manston Airport's passenger terminal because of the proximity of the car park and the short walking distance between check-in and departure gates.</p>

Table 8.12: Summary of issues raised in community consultation in response to Question 4 of the Feedback Form and how RiverOak had regard to the responses

Question 4: Do you have any suggestions about how we could support the Spitfire & Hurricane Memorial Museum and the RAF Manston History Museum?

Topic	Issue raised	Change? Y / N	Regard had to response
General Support	340 respondents expressed general support for RiverOak's proposals and/or the impact they would have on the museums	N	RiverOak's view is that the re-opening Manston would be beneficial for the museums and restates its intention to work with both museums to explore the possibility of developing a funding strategy for the improvement of both, without threatening their independence.
General Opposition	72 respondents expressed general opposition to RiverOak's proposals. 1 respondent said that other museums were popular and more effective.	N	RiverOak notes that the decline in visitor numbers at the museums appears to have coincided with the closure of the airport in May 2014.
Access	6 comments asked for improved road access. 25 comments asked for better public access including disabled access. 8 comments suggested easy access from the passenger terminal to the museums to encourage attendance, such as a shuttle bus. One respondent said that the reopening of the airport would discourage attendance.	Y	RiverOak's proposals include four new accesses to the Proposed Development site which are set out in detail in Chapter 9 of the Transport Assessment (document reference TR020002/APP/5.2-15), which also outlines the details of a road widening scheme on Spitfire Way and Manston Road, which will improve access to the A299. RiverOak confirms that disabled access to the passenger terminal will comply with the highest current standards. Disabled parking will be provided close to the relevant buildings and areas, according to the relevant standards.

			<p>Improving public transport is an important element of the public access proposals and is included within the Airport Surface Access Strategy, Public Rights of Way Management Plan and Travel Plan (Appendices M and O at document reference TR020002/APP/5.2-25), all appended to the Transport Assessment. . These documents define the proposals for public access and any improvements to the local public transport and public access offering, including pedestrian provision and road network improvements.</p> <p>RiverOak will ensure that the museums are advertised in the passenger terminal and will explore the possibility of a shuttle bus. However, a shuttle bus operation for non-passengers between the museums and the terminal might raise security issues and would have to be considered further at a later stage.</p>
Amalgamation	37 respondents suggested combining the museums, 4 recommended keeping them separate and 1 suggested only keeping the RAF Manston History Museum.	N	<p>An area of approximately 3ha has been safeguarded in the DCO application for operation of the RAF Manston History Museum, Spitfire & Hurricane Memorial Museum and memorial garden. This area encompasses the current museums and memorial grounds and allows for additional areas in which the museums could be expanded or relocated. A decision on whether to proceed with any relocation works will only be made after consultation with the museum operators to ensure that the museums' needs are reflected. A preliminary meeting was held between RiverOak and the museums on the 26 March 2018.</p> <p>RiverOak will respect the museums' wishes on whether these will be joint or separate.</p>
Enlargement	296 comments suggested the museums should be enlarged in various ways. Suggestions included: provision of airside access; an education centre; a larger car park; a viewing platform and café in the old	Y	As stated above, RiverOak will work with the museum operators and will respect their wishes.

	control tower; more exhibition space; a live feed from the runway; and a play area		
Relocation	48 comments suggested new locations for the museums and issues associated with relocation.	N	An area of approximately 3ha has been safeguarded in the DCO application for operation of the RAF Manston History Museum, Spitfire & Hurricane Memorial Museum and memorial garden. This area encompasses the current museums and memorial grounds and allows for additional areas in which the museums could be expanded or relocated. A decision on whether to proceed with any relocation works will only be made after consultation with the museum operators to ensure that the museums' needs are reflected. A preliminary meeting was held between RiverOak and the museums on the 26 March 2018.
Enhancement	280 comments suggested new aircraft to be displayed and other additional offerings that might attract more visitors or improve the museums' operation, knowledge or facilities	Y	As stated above, RiverOak will work with the museum operators and will respect their wishes.
Education	14 respondents suggested exploiting the educational opportunities the museums presented including hosting school visits and using the museums to promote careers in aviation	Y	We are not in control of educational opportunities but will pass these suggestions on to the museum operators and East Kent College. The operation of the airport and the jobs it would create are expected to raise the aspirations of young people and encourage them to continue from school to further and higher education.
Publicity	107 comments suggested advertising the museums more	Y	RiverOak will advertise the museums at the airport; further advertising is a decision for the museum operators. The museums benefit from the attention of aircraft enthusiasts and so RiverOak anticipates that footfall at the museums will increase when the airport is operational.

Air show	60 comments suggested the holding of an air show, specifying various types of aircraft that could be exhibited	Y	The airport would have the physical capability to host an air show, where operations and timetabling of flights allows. RiverOak supports air shows in principle but points out that they are not compatible with the operation of a busy airport. Ultimately the decision would lie with the CAA.
Funding	There were 222 comments about increasing funding for the museums, through grants or a fund from RiverOak, levies on tickets, unwanted foreign coins, selling advertising space, fundraising events and voluntary donations; on the other hand 23 comments said the museums did not need more funding. 31 comments were about providing operational help to the museums and 2 respondents provided conditional support for the airport if the museums were supported.	Y	RiverOak is setting up a community fund, fed by levies from fines from noisy and off-path aircraft plus a fixed annual commitment of funding from RiverOak, and this will be able to dedicate funds to the museums at the discretion of the locally-created consultative committee. Admission pricing is a matter for the museum operators.
Preservation	247 comments said the museums should be left alone or minimal changes made, and ten comments said that the memorial gardens should be preserved	N	An area of approximately 3ha has been safeguarded in the DCO application for operation of the RAF Manston History Museum, Spitfire & Hurricane Memorial Museum and memorial garden. This area encompasses the current museums and memorial grounds and allows for additional areas in which the museums could be expanded or relocated. A decision on whether to proceed with any relocation works will only be made after consultation with the museum operators to ensure that the museums' needs are reflected. A preliminary meeting was held between RiverOak and the museums on the 26 March 2018.
Relevance	63 comments said that the question about museums was irrelevant or a distraction; on the other hand 28 comments said they were an important part of the	N	RiverOak believes that the museums are a key element of the future of the airport as they celebrate its illustrious past and should not be forgotten.

	history of Kent and 23 comments said they that they had a key role to play in the local community,		
Ownership	25 comments suggested offering the freehold of the land of the new site to the museum operators and one suggested offering a long term lease	N	RiverOak recognise that the museums should be given as much certainty of continuing as possible. However, it would cause too many operational difficulties if RiverOak did not own the freehold to the whole airport; the current arrangements will be replicated.

Table 8.13: Summary of issues raised in community consultation in response to Question 5 of the Feedback Form and how RiverOak had regard to the responses

Question 5: Do you have any comments or suggestions about the potential impacts of the Proposed Development and our proposals to limit them?

Topic	Issue raised	Change? Y / N	Regard had to response
Flight Paths	<p>16 respondents suggested that flight paths would need to be agreed with local communities or changed to minimise disruption and avoid settlements.</p> <p>41 comments were made about the negative effects on those living under flight paths or in close proximity to the site.</p> <p>9 respondents raised concerns about the impact of low flying aircrafts with a further 3 concerned about the impact this would have on the landscape.</p> <p>7 respondents suggested that limits should be imposed on the number of flights and they should be gradually increased.</p>	Y	<p>RiverOak has assessed flight ‘swathes’ and local residents can be reassured that the flights will be kept to those swathes. Should the applied-for DCO be granted RiverOak will develop and submit an airspace change proposal (ACP) to the CAA. Under the ACP, the CAA will expect the airport to develop proposals which seek to quantify and minimise environmental impact. The process includes a further round of environmental impact assessments and public consultation on the specific flightpaths being proposed. Proposed flightpaths will have to be within the proposed swathes; if RiverOak wishes to propose flightpaths which are beyond these then we will have to apply to amend the DCO to match them. Low flying will be limited but unavoidable in the final phases of landing and the initial phases of departure near the airport.</p> <p>RiverOak is proposing a night time policy which imposes movement limits combined with measures to reduce noise. Further information can be found in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4).</p>
Environment	9 comments were concerned that the impact the Proposed Development would have on the environment	Y	The effects of the Proposed Development on the nearby European sites (Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar sites) has been addressed within Chapter 7 Biodiversity of the ES (document reference

	<p>was not being taken into account. They raised concerns about the effects on:</p> <ul style="list-style-type: none"> - the River Stour Valley - nearby protected bird sanctuary - the freshwater environment and water contamination concerns - coastline - proximity to a SSSI, RAMSCAR site and National Nature Reserve <p>2 respondents said concerned that damage would be caused to protected areas, such as Pegwell Bay.</p> <p>4 commented that it should be constructed and operated in an environmentally conscious way and 3 said that plans should limit the impact on the environment by using a state of the art tear down facility. 3 respondents said that the promoters would mitigate the negative impacts sufficiently, including during construction.</p> <p>However, 35 respondents had concerns that the promoter's mitigation proposals were not enough or would not be effective and, 1 said that the Proposed Development should be abandoned entirely.</p>		<p>TR020002/APP/5.2-1) and the Report to inform Appropriate Assessment (Appendix 7.1 of the ES (document reference TR020002/APP/5.2-6)), which specifically covers European sites. Effects on nearby Sites of Special Scientific Interests (SSSIs) and other wildlife sites have been dealt with in Chapter 7 of the ES. This includes consideration of the effects of increased water discharge into Pegwell Bay (via the outfall), air pollution on habitats, and noise from aircraft flights on birds using Pegwell Bay. Effects on the freshwater environment are addressed in Chapter 8: Freshwater Environment of the ES (document reference TR020002/APP/5.2-1).</p> <p>Impacts on the River Stour and wider freshwater environment are addressed in Chapter 8 of the ES. This assessment indicates that as there are no surface water courses present on site which connect to the Stour, then the focus of the mitigation of any effects should be the protection of groundwater quality and the correct management of surface water drainage. These have been addressed in the assessments presented in Chapter 8 which cover the construction and operation phases.</p> <p>All mitigation for the construction phase is outlined within the CEMP (Appendix 3.2 of the ES (document reference TR020002/APP/5.2-6)) and for the operational phase will be outlined within the OEMP which will be finalised towards the end of the construction phase. This utilises the latest guidance and best practice measures.</p>
Land contamination	6 respondents were concerned that pollution from the operation of the airport and associated activities would contaminate or degrade the site. 2 respondents raised concerns about oil, fuel and heavy metal from aircraft	Y	Site specific measures required to address effective identification, protection, containment, attenuation, management and recovery of potential contaminants at the site during the construction and

	<p>breaking would contaminate the Site and 1 said that pollution would damage farmland. In contrast, 1 respondent said that the effect on the land would be negligible.</p>		<p>operational phases are being discussed with regulators, including the EA, TDC and other stakeholders as appropriate.</p> <p>Previous site activities have been assessed in the Phase 1 Desk Study (Appendix 10.1 of the ES (document reference TR020002/APP/5.2-10 – 5.2-12)). Future aircraft recycling would be a permitted activity. The permit would require the operator to mitigate the risks cited. This is not part of the Land Quality assessment.</p>
Emissions	<p>129 comments set out general concerns about the impact pollution and airborne particulate matter would have on air quality in the area. 19 respondents specifically mentioned that the airport will produce airborne particulates which are damaging to health (incl. PM10, PM2.5, 'dust'), and highlighted how this would be produced from fuel delivery and storage.</p> <p>2 respondents said that there may be particular problems from fuel dumping.</p> <p>20 suggested that only modern aircraft should be used or that older aircrafts should be banned. 12 raised concerns about the fumes and smell from low flying and idling aircraft.</p> <p>11 comments said that the promoter's mitigation proposals were too weak, specifically highlighting that information on air quality had not been included in mitigation proposals and that air quality levels in the area already breached EU standards.</p> <p>On the other hand, 24 respondents said that concerns about air pollution were insignificant given the location of the airport and modern aircrafts.</p>	Y	<p>The air quality effects resulting from the Proposed Development have been assessed in Chapter 6: Air Quality of the ES (document reference TR020002/APP/5.2-1). The assessment shows that air quality will remain comfortably within legal limits. These legal limits are themselves based on World Health Organization guidance on health effects, allowing for the most vulnerable members of society. The air quality impacts of the airport are small and confined to the vicinity of the airfield and certain major roads. The impact of air quality on wildlife, ecosystems and biodiversity is assessed in Chapter 7: Biodiversity of the ES (document reference TR020002/APP/5.2-1) and is shown to be not significant.</p> <p>Concentrations of oxides of nitrogen resulting from road traffic (including HGVs) have been assessed as part of the air quality assessment in Chapter 6: Air Quality of the ES, and shown to be not significant. Emissions of sulphur dioxide and carbon monoxide from modern vehicles are negligible, and ambient concentrations of these pollutants are extremely low these days, so the impact of the Proposed Development on these pollutants will be not significant.</p> <p>The impact of dust has also been assessed in Chapter 6: Air Quality of the ES. Mitigation measures will be implemented in line with best practice to ensure that the impacts are reduced to a not significant level, in accordance with the CEMP (Appendix 3.2 of the ES</p>

	<p>4 responses raised concerns about the emissions caused by an increase in HGVs in the area and comments were received from 7 respondents about emissions from vehicles leading to a build-up of specific harmful gases such as sulphur dioxide, oxides of nitrogen and carbon monoxide</p> <p>3 respondents said that emissions from housing proposals would be worse than those from the airport and 34 said that it would damage regeneration in Ramsgate.</p>		<p>(document reference TR020002/APP/5.2-6). Modern aircraft very rarely employ fuel dumping, and only in emergencies. If fuel dumping is necessary, it is normally carried out over the sea. Certain older aircraft will be banned, primarily for noise reasons and based on their noise performance. More details on this can be found in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (TR020002/APP/2.4).</p> <p>The impact of odour from the airport has been assessed in Appendix 6.4 to Chapter 6: Air Quality in the ES (document reference TR020002/APP/5.2-1).</p> <p>Details of various measures to minimise air pollution during the construction phase are included in the CEMP Measures to minimise air pollution during operation will include the use of electric plant and vehicles airside, airfield design which minimises the time aircraft spend on the ground and locates stand areas in the centre of the airfield away from sensitive receptors, and controls on APU usage.</p>
Water	<p>13 respondents commented on contamination and protection of the water table, supply or aquifer, and specifically raised concerns around adding to run off and impacts in protected areas such as Pegwell Bay.</p> <p>5 respondents requested that Proposed Development plans protect the water supply.</p> <p>7 said that they had been given insufficient information about mitigation measures or that the risks had not been sufficiently detailed. In contrast, 3 respondents said that water issues had been properly addressed.</p>	Y	<p>RiverOak is being very careful to protect the aquifer that runs roughly beneath the runway, particularly with respect to the redesign of the existing fuel farm nearby. We are in discussion with the EA on the issue of water contamination and will seek their agreement of our final mitigation measures.</p> <p>The Hydrogeological Impact Assessment, Appendix 8.1 of Chapter 8 Freshwater Environment of the ES (document reference TR020002/APP/5.2-7) includes an assessment of the risk to the groundwater environment from activities and sets out appropriate mitigation measures that are included in the CEMP (Appendix 3.2 of the ES (document reference TR020002/APP/5.2-6)) and to be</p>

			<p>implemented in the construction phase and incorporated into the site's design.</p> <p>Proposed mitigation is discussed in detail in the mitigation section of Chapter 8 Freshwater Environment in the ES (document reference TR020002/APP/5.2-1).</p>
Noise and vibration	<p>29 respondents said that this would not be an issue or people liked the noise.</p> <p>243 comments were received about the negative impact of noise and the effect it would have on daily life including when it is too loud, disrupting conversations and classes in schools. They specifically mentioned the noise from an increase in: air (32) and road (35) freight/traffic; take off and landings (1); number of flights (20); the operation of the site (1); and low flying (48) aircrafts. Respondents specifically mentioned that cargo/freight aircrafts usually cause greater noise and/or vibration due to being older aircrafts.</p> <p>Some respondents suggested mitigation measures such as restrictions for noisy planes (5) and encouraging use of modern aircraft which have a smaller impact (27). However, 8 respondents said that noise mitigation schemes would not meet people's demands and 4 wanted a guarantee of no noise or an upper limit to be put in place.</p> <p>13 respondents raised the impact of vibration buildings.</p>	Y	<p>RiverOak is proposing a night time policy which imposes movement limits combined with measures to reduce noise. Further information can be found in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4).</p>
Biodiversity	<p>6 respondents said that the Proposed Development would promote biodiversity and 7 said that the negative impact would be slight.</p>	Y	<p>Impacts are to be mitigated so that there is no net loss of biodiversity interest. Mitigation will be secured off-site if necessary and construction cannot commence until this is secured as set out in</p>

	<p>On the other hand, 39 respondents said that the Proposed Development would have a negative impact, particularly on local beaches; birds; endangered species; and plants.</p> <p>13 responses also raised concerns about the effect on protected or conservation areas such as Pegwell and Sandwich Bay.</p> <p>1 respondent raised the concern that animal quarantine facilities on the site would not be of the required standard.</p>		<p>requirement 9 of the DCO document reference TR020002/APP/2.1).</p> <p>Impacts upon the adjacent coastal habitats (including the designated sites) and species have been assessed with no significant adverse impact (Appendix 7.1 of the ES (document reference TR020002/APP/5.2-6).</p> <p>Animal quarantine facilities do not form part of the Proposed Development and so have not been considered within the ES. However, any facilities will be to an appropriate industry standard and would take into account any local sensitivities.</p>
Heritage	<p>11 respondents highlighted the effects of the reopening on historic/heritage areas Concerns were raised that the reopening would ruin the historical Georgian ambience and heritage of Ramsgate and that any development must respect the historical character of Ramsgate. 1 respondent said that the plans appreciate the history of the site/town.</p>	N	<p>Impacts on heritage assets have been assessed and are reported in Chapter 9: Historic Environment of the ES (document reference TR020002/APP/5.2-1). The assessment process has been undertaken in line with relevant policies and legislative requirements (see Chapter 9: Historic Environment, Section 9.2) and appropriate mitigation measures are proposed in Sections 9.8-9.10 of Chapter 9: Historic Environment.</p> <p>The assessment includes consideration of indirect effects on off-site designated heritage assets with the potential to be affected, including conservation areas and listed buildings in Ramsgate (Chapter 9: Historic Environment, Section 9.10 and Appendix 9.1 (document reference TR020002/APP/5.2-8 and 5.2-9)).</p>
Visual Impacts	<p>4 respondents had concerns about negative visual impacts from the Proposed Development, particularly at Whitstable, Herne Bay and Reculver, and said that the runway is a blight on the landscape.</p>	N	<p>Whitstable, Herne Bay and Reculver lie outside the Landscape and Visual Impact Assessment (LVIA) Study Area, i.e. outside the area within which significant landscape or visual effects may reasonably be expected to occur. The rationale for the definition of the LVIA Study Area is provided in Chapter 11: Landscape and Visual, Section 11.3 of the ES document reference TR020002/5.2-2).</p>

			<p>It is noted that the adequacy of the LVIA Study Area has not been questioned by any of the statutory consultee bodies either at Scoping or in response to the 2017 and 2018 statutory consultations.</p> <p>An assessment of the impact of the Proposed Development on landscape character is provided in section 11.8 of Chapter 11 of the ES.</p>
Light	4 respondents raised concerns about the impact of light pollution from the site.	Y	<p>The development of lighting for the Proposed Development will form part of the detailed design process and, within the confines of the CAA regulations for airports, that scheme would adopt lighting principles that seek to minimise light spill. It is likely that such measures would primarily be applied to the airport related development on the Northern Grass area and any landside components of development that are not the subject of specific lighting design requirements. Lighting design will provide additional information to supplement, but not supersede, the assessments made in Chapter 11 Landscape and Visual of the ES (Document reference TR020002/APP/5.2-2).</p>
Health	45 respondents said that reopening the site would have a negative impact on the physical and mental health of the local population. Comments specifically mentioned issues for development of children, strokes, heart disease, lung cancer, chronic and acute respiratory diseases, higher pregnancy complication rates and higher infant mortality, mental illness and depression and lower life expectancy, health inequality and chronic obstructive pulmonary disease (COPD). 34 respondents said that general health would be damaged due to increased noise and 12 respondents specifically raised concerns that mental health would be	Y	<p>The Health Impact Assessment (Appendix 15.1) and Chapter 15: Health and Wellbeing of the ES (document reference TR020002/APP/5.2-13 and 5.2-2, respectively) have assessed potential effects on physical and mental health and wellbeing, including cardiovascular and respiratory diseases and mortality, depression or anxiety, and qualitatively reported mental wellbeing. Some adverse impacts due to noise and air pollutant emissions are predicted, and measures to mitigate these are set out in Appendix 15.1 and Chapter 15. Beneficial effects due to employment generation, supply chain spending and connectivity are predicted, and measures to enhance these are also set out in these documents.</p>

	<p>damaged due to increased noise, including from night flights.</p> <p>46 comments were received about health risks from living under a flying path and 12 mentioned the impact of noise on mental health. One respondent said that the impact of radar on health was currently unknown.</p> <p>In support of these concerns, 5 respondents quoted reports reports/evidence about the negative effects of living near an airport. 48 respondents raised concerns about the effects of emissions/air quality on health.</p> <p>1 respondent said they would bring legal proceedings if the proposals impacted their family's health (asthma).</p>		
Night Flights	<p>31 respondents were opposed to night flights and 47 raised concerns about the impact on sleep deprivation and 8 on health.</p> <p>23 respondents suggested that limits should be put in place (limited times, or landings but not take offs) and 6 said that flights should only be allowed for specific reasons, for example humanitarian flights or perishable goods.</p> <p>45 comments were received suggesting that night flights were too noisy and the airport should have to prove a public benefit before starting them. 12 respondents said they did not think the promoter would minimise night flights.</p>	Y	RiverOak is proposing a night time policy which imposes movement limits combined with measures to reduce noise. Further information can be found in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4).
Economic	75 respondents said that the development was positive or that the positive effects would outweigh the negative, for example increases in employment, tourists and	N	RiverOak is confident that the re-opening of Manston Airport will bring economic benefits. Details are included in Volume IV of the Azimuth Report (document reference TR020002/APP/7.4). This volume

	<p>property values. 3 said that this was the type of develop Thanet needs.</p> <p>24 responses highlighted the negative effect it would have on house prices in the area and 40 said that it would have a negative impact on regeneration in Ramsgate. 23 respondents also said that the positive impacts the Proposed Development would have on employment had been overestimated.</p>		<p>includes details of employment and also considers the likely impact on tourism in Thanet based on the experience at three other airports – Southend, Southampton and Bournemouth. These examples show that the presence of an airport is likely to provide a positive impact on regeneration of the area.</p> <p>RiverOak will compensate landowners according to the national compensation code for property compensation.</p>
Tourism	<p>Some respondents said that the proposals would increase tourism in the area. On the other hand, 24 responses said that the Proposed Development would damage tourism and 21 said this would be a result of air and noise pollution, and environmental damage.</p>	Y	<p>We believe that our small passenger operation will bring an overall benefit to tourism in the area, as shown by other airports such as Southend Southampton and Bournemouth These airports are close to coastal towns and have not been shown to damage tourism, indeed tourism seems to flourish will the presence of an airport. No examples of negative impacts on tourism could be found in a search of the literature.</p>
Surface Access	<p>4 responses were positive about the quality of infrastructure around the site whilst others said that there would be issues, highlighting difficult HGV access (10) and levels of congestion/ traffic on local roads, motorways and in villages (104).</p> <p>26 comments were received about access onto and around the site, for example from Manston Road, Spitfire Way and B2050. They highlighted that this was a major route to preserve.</p> <p>53 respondents suggested mitigation measures which the promoter could put in place, including: connecting to the national fuel pipeline system; provision of lorry park/laybys; local road improvements; improvement of local cycle ways and footpaths; more than one access</p>	Y	<p>A Transport Assessment (document reference TR020002/APP/5.2-15) has been carried out and is reported on in Chapter 14 of the ES (document TR020002/APP/5.2-2). This assesses, amongst other things, operational junction capacity and puts forward suggestions for mitigating against impacts.</p> <p>As part of the Transport Assessment detailed junction models for 28 local junctions as well as all the access junctions to the site have been prepared to inform where junction mitigation proposals may be required.</p> <p>The junctions modelled include junctions in Broadstairs, Margate, Ramsgate and Manston, key A299 junctions and many others and include the key junctions along Spitfire Way.</p>

	<p>route to London; improved plans to move freight out of the area; and traffic calming measures.</p> <p>Some respondents suggested integrating the airport with other public transport: with a new parkway station (7), railway (23) and bus services (2).</p>		<p>A Travel Plan has been prepared for the site as well as an Airport Surface Access Strategy and Car Park Strategy (Appendices L, O and N in document reference TR020002/APP/5.2-25) which sets out how the site will be better linked to the local public transport facilities that are currently in place in the local areas how would be enhanced as part of the proposals. These are appended to the Transport Assessment (document reference TR020002/APP/5.2-15).</p>
Compensation	<p>5 responses said that the compensation offered would be insufficient. 6 respondents suggested offering insulation measures, and 11 suggested offering compensation which equates to the value of the property, business or relocation.</p> <p>8 responses raised concerns that listed buildings cannot be fitted with triple glazing and or noise insulation or that this would be extremely costly.</p> <p>1 respondent said that they would take legal advice if the value of their property diminished.</p>	Y	<p>RiverOak has offered an insulation and relocation package which matches and exceeds Government guidance. The compensation to be made available to residents for insulation purposes exceeds that provided by larger, busier UK airports.</p>
Engagement - Consultation	<p>Some respondents commented on the consultation and how the process had been conducted.</p> <p>4 respondents provided positive comments about the consultation proposals, documents and process, and 1 was supportive but requested sensitivity to local concerns.</p> <p>21 said that wider consultation was needed as a result of some areas/individuals not being adequately consulted, insufficient advertising, and longer events being held in areas that were further away,</p>	N	<p>As set out in this Report, RiverOak believes its consultation was robust and had an appropriate reach.</p> <p>The 2017 and 2018 PEIRs reflected the information that was available at the time of consultation and followed industry standards for its presentation and content.</p> <p>Local residents were informed about the consultation through multiple methods, including direct mail, adverts in local newspapers and notifications online. The plan for publicising the consultation was set out in our SoCC which was published ahead of the start of consultation.</p>

	<p>6 said that the consultation information provided was too dense while 24 said that they had had insufficient detail, for example in flights, decibel range and the public safe zone around Ramsgate.</p> <p>1 respondent said that the promoters had failed to follow the appropriate guidelines for consultation. 7 respondents said that local residents should be kept informed. 10 respondents said that they lacked trust in the content on the report due to the motives of the promoters, specifically citing profit maximisation, hidden intentions, and their credibility.</p> <p>1 response received said that Stone Hill Park was being misleading.</p> <p>2 respondents said that Craig McKinley MP has conflicts of interest as he has personal business interests and lives outside the area.</p>		<p>Seven public events were held during the six-week consultation across weekdays and Saturdays. Weekday events were held from 2pm until 8pm to ensure anyone working during the day was able to attend.</p> <p>RiverOak also held four additional evening events in locations across Thanet following requests from Parish Councils.</p> <p>RiverOak consulted widely using a range of methods, resulting in over 1,350 attendees at the seven public consultation events and over 570 people at four additional evening events. A total of 2,174 responses were received to the consultation.</p> <p>As part of the suite of consultation documents, RiverOak produced an Overview Report which provided consultees with a summary of our proposals, details of what we were consulting on and a non-technical summary of the PEIR.</p>
Impact Assessment	<p>33 respondents suggested that the impact assessment had been inadequate, not provided enough detail or had underestimated. These comment related to:-</p> <ul style="list-style-type: none"> - impacts on specific areas or settlements nearby omitted from report, including under flight paths e.g. Herne Bay - negative impacts on Kent's wider economy - a suggestion that the proposals only outline purely legal requirements - a suggestion that the impact assessment did not take into account concerns of local population - a failure to apply a precautionary principle to water supply contamination). 	Y	<p>The PEIR was acknowledged to be incomplete as it is the assessments that have been undertaken at the time of publication. Further work has been undertaken on the effects of the Proposed Development and the ES (document reference TR020002/APP/5.2) reports on this additional work.</p>

	<p>15 comments said that the information respondents had received had been insufficient, for example on the use of landscaping to minimise pollution (e.g. on the Northern Grass area), the route of the railway line in relation to the location of warehousing, fuel transport, and socio economic impacts. 1 respondent considered that the Proposed Development proposals were out of date.</p> <p>4 comments were concerned that the impact assessments were inconclusive, 2 suggested the inclusion of case studies and 7 suggested that noise contour maps should be included showing the noise within Ramsgate for aircraft take-off and landing, with reference to the different types of incoming aircraft.</p> <p>1 respondent said that no EIA had been made in line with Reg 10 of the EIA Regulations 2009.</p>		
Site	<p>7 respondents said that the site should be enhanced or changed to be as attractive as possible, for example through landscaping.</p> <p>5 responses suggested amending the angle of the runway.</p> <p>3 raised specific concerns about the location of the fuel farm on the site, in particular that it was too close to housing.</p> <p>Some responses said that the site should be reopened as an airport given it already existed whilst others said that the site could be better used (7), that they preferred</p>	N	<p>RiverOak is committed to reopening the site as an airport.</p> <p>A large reorientation of the runway alignment would negate the main benefit of the site re-use of the existing runway asset is a key part of the proposals. Runways are also typically aligned to take advantage of predominant wind directions, for the UK this results in primary runways being in an East / West configuration as at Manston.</p> <p>A subtle alteration of the runway orientation would only displace any effect/disturbance of flight (airborne) noise to other communities or sensitive areas while also resulting in a significant change in the airport boundary and scope of the planned engineering works</p>

	other proposals or that the scale of the Proposed Development was larger than expected (2).		Landscaping will be introduced to reduce the visual impact of the development – see Chapter 11 of the ES for details (document reference TR020002/5.2-2).
General Support	<p>244 responses were generally supportive of the Proposed Development or said that people would get used to it 22 respondents said that as the airport already existed, it should be reopened. 34 comments showed a preference for the airport rather than housing proposals, citing that there are not enough local resources or infrastructure for more housing, that it would be better for Ramsgate or that traffic from the airport preferable to that of housing.</p> <p>77 comments said that aspects had been covered sufficiently and specifically mentioning the analysis of both airspace planning and limiting plane idling.</p> <p>6 respondents supported an increase in passenger flights in the area.</p>	N	RiverOak is grateful for the continuing support from a significant part of the public.
General Opposition	109 responses were generally opposed to the Proposed Development or said that the Proposed Development should not go ahead 24 responses said that quality of life would be diminished and 24 respondents said that the impact would be entirely negative. 1 respondent said to expect litigation if the plans went ahead.	N	The Health Impact Assessment (Appendix 15.1) and Chapter 15: Health and Wellbeing of the ES (document reference TR020002/APP/5.2-2 and 5.2-13 , respectively) have assessed potential effects. Some adverse impacts due to noise and air pollutant emissions are predicted, and measures to mitigate these are set out in these documents. Beneficial effects due to employment generation, supply chain spending and connectivity are predicted, and measures to enhance these are set out in the same Chapters.

Table 8.14: Summary of issues raised in community consultation in response to Question 6 of the Feedback Form and how RiverOak had regard to the responses

Question 6: Do you have any comments on the possibility for limited night flights at Manston Airport?

Topic	Issue raised	Change? Y / N	Regard had to response
No objection	Over 500 responses contained support for night flights or did not object to them in principle.	Y	RiverOak welcomes support for some form of night flights but is conscious that they should be controlled. RiverOak is therefore proposing a night time policy which imposes movement limits combined with measures to reduce noise. Further information can be found in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4).
Aircraft type	A number of respondents raised the issue of aircraft type and requested that noise be kept to a minimum by allowing only modern or quiet aircraft to use the airport at night. Several respondents also requested demonstration fly-over of quiet engines	Y	As part of our noise mitigation plan we are using a nightly 'Quota Count' system where noisier aircraft will either be too noisy altogether or will use up more of the quota and will therefore be discouraged. Please see the Noise Mitigation Plan (document reference TR020002/APP/2.4) for further detailed information.
Flight paths	<p>A number of respondents raised concerns about the flight paths of night flights and commented that RiverOak would need to choose them carefully to minimise impact on the local community.</p> <p>A range of suggestions were made to reduce the negative effects including:</p>	Y	RiverOak is proposing a Noise Mitigation Plan which imposes a quota based limit on night time movements together with other measures to reduce noise. It is not feasible to realign the runway, but one of our Noise Mitigation Plan pledges is that we will seek to maximise flightpaths, included as part of the airspace change proposal, to and from the west of the airport to avoid overflying Ramsgate where operationally feasible (although the CAA will decide this and it is can be overridden by wind conditions, pilot discretion and operational safety). We will also introduce standard instrument departure

	<ul style="list-style-type: none"> • Re-aligning the runway so flightpath crossed Pegwell Bay; • Ensuring flight path is over farmland; • Imposing limits on flight paths over residential areas; • Ensuring take off is in a westerly direction; • Ensuring flights take off over the sea; • Ensuring take off is from runway 28 and landing is on runway 10 to minimise noise over residential areas; and <p>Ensuring night flights are only allowed to fly in from over the Channel and not over urban East Kent.</p>		<p>procedures (which were not previously in place at Manston) which will bring greater certainty over the routes flown by aircraft taking off from the airport.</p> <p>RiverOak has considered whether to rotate the runway away from Ramsgate. However, it is not feasible to realign the runway. A subtle alteration of the runway orientation would only displace any effect/disturbance of flight (airborne) noise to other communities or sensitive areas while also resulting in a significant change in the airport boundary and scope of the planned engineering works.</p> <p>RiverOak has assessed flight ‘swathes’ and local residents can be reassured that the flights will be kept to those swathes. Should the applied for DCO be granted RiverOak will develop and submit an airspace change proposal (ACP) to the CAA. Under the ACP, the CAA will expect the airport to develop proposals which seek to quantify and minimise environmental impact. The process includes a further round of environmental impact assessments and public consultation on the specific flightpaths being proposed. Proposed flightpaths will have to be within the proposed swathes; if RiverOak wishes to propose flightpaths which are beyond these then we will have to apply to amend the DCO to match them.</p>
Timing	<p>Many of the respondents did not object to night flights in principle but suggested time limits on the flights.</p> <p>8 respondents suggested night flights should be limited to certain nights of the week or should avoid weekends.</p> <p>105 responses suggested that flights should not be allowed during specific times at night with a variety of suggested times given. Some of these respondents also suggested that these restrictions should be</p>	Y	<p>RiverOak is proposing a night time policy which imposes movement limits combined with measures to reduce noise. Further information can be found in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4).</p>

	<p>location specific, preventing flights over Ramsgate during certain times.</p> <p>5 Responses suggested that the impact of night flights could be reduced by ensuring there was a gap between night flights. 2 respondents suggested there should be more than 1 hour between each night flight.</p> <p>3 respondents suggested that there should be restrictions on what type of flights could occur at night: 2 responses suggested that only quiet planes should be allowed at night and 1 response requested that long haul flights should arrive early in the morning rather than late in the evening.</p>		
Flight numbers	<p>Many of the responses suggested that if night flights are to be included in the Proposed Development proposals then restrictions on the number of flights should be put in place. A range of restrictions were suggested.</p> <p>94 responses recognised that night flights may be necessary to ensure the viability of the airport but requested that they be kept to a minimum with some of these responses requesting that warning should be given to residents if the airport would be operating during the night. 6 respondents noted that they would support the Proposed Development if night flights were restricted.</p> <p>Other respondents suggested restrictions which ranged from 20 per month to 10 per night or a number corresponding to the normal limit for other UK airports</p>	Y	<p>RiverOak is proposing a Noise Mitigation Plan which imposes a quota based limit on night time movements together with other measures to reduce noise. Further information can be found in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4).</p>

	<p>with some respondents suggesting that companies should be penalised for exceeding restrictions.</p> <p>1 respondent suggested that night flights should be introduced gradually to observe their impact.</p>		
Flight type	<p>Many of the responses suggested restrictions should be placed on the type of flight which would be allowed to use the airport at night.</p> <p>96 responses suggested that the airport should only be used at night for emergencies. Examples given included medical emergencies, aid flights, emergency diversions or delayed flights carrying perishables.</p> <p>10 Respondents suggested that only humanitarian or military flights should be allowed to operate at the airport at night but if possible this should be limited to the hours between 7am and 11pm.</p> <p>10 responses requested that delayed or unscheduled landings should be allowed at night.</p> <p>4 responses also requested that the origin/registration details of night flights should be publicised.</p>	N	<p>RiverOak is proposing a night time policy which imposes movement limits combined with measures to reduce noise. Further information can be found in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4).</p>
Ground operations	<p>2 respondents noted that noise from planes on the ground and from ground equipment needed to be addressed with one respondent requesting that planes should not be allowed to taxi for too long.</p>	N	<p>In a commercial airport, reducing the time taken for aircraft to taxi and from the runway is an important commercial consideration. The airport will be designed to have the capacity so that aircraft spend the minimum amount of time waiting to take off or land. RiverOak will be introducing infrastructure to reduce reliance on ground equipment to power aircraft.</p>

Mitigation	<p>10 responses discussed various mitigation measures to offset the impacts of night flights.</p> <p>66 respondents were concerned that the noise mitigation measures proposed would be inadequate with some suggesting that the measures had not worked in the past.</p> <p>2 respondents requested that help be provided for soundproofing of local resident's housing and 2 respondents requested other incentives/compensation should be offered to those effected by the proposals e.g. a reduction in council tax. Other respondents also suggested that extra money would need to be given to the NHS.</p> <p>1 respondent raised the issue that some properties may not be able to install double glazing to mitigate noise if they are listed or have other conservation restrictions.</p>	Y	<p>The potential future noise effects are assessed in the ES (document reference TR020002/APP/5.2-2), Chapter 12: Noise and Section 12.9 presents a summary of indicative noise effects. During the CAP1616 ACP consultation process a noise envelope will be developed. The noise envelope will provide a framework for limiting the future noise effects of the airport, and will likely include (amongst other things) the provision of a contour area restriction, movement or passenger/freight limit and a Seasonal Quota Count. The noise envelope will be developed using CAP1129 and be secured following an EU Regulation 598 review.</p> <p>As part of our Noise Mitigation Plan we are offering grants for sound insulation to properties whose market values we are advised could be affected by noise, i.e. those within the 63 decibel daytime noise contour and/or the 54 decibel night time contour.</p>
Road noise	<p>4 respondents raised the issue of road noise to and from the airport. These respondents suggested that access to the airport by lorries or cars should be restricted between certain hours, for example before 5:30am or after midnight.</p>	Y	<p>As part of our transport proposals, HGVs are proposed in both the construction and operational phases to only route from the A299 via an improved link along Spitfire Way and Manston Road. This will be the signed route to and from the airport strategically for all vehicles. See the Construction Traffic Mitigation Plan and Airport Surface Access Strategy at Appendices M and O to the Transport Assessment (document reference TR020002/APP/5.2-25)</p> <p>It is not proposed to restrict vehicles at certain times as with the nature of the airport and the associated development 24-hour shifts for staff are required and patterns of traffic will be defined by this.</p>

			HGV will also need to arrive and depart on 24 schedules depending on the locations trips arriving and departing to.
Light	A number of respondents (to this and other questions) raised the issue if light pollution which would be caused by the airport operating at night.	Y	The development of lighting for the Proposed Development will form part of the detailed design process and, within the confines of the CAA regulations for airports, that scheme would adopt lighting principles that seek to minimise light spill. It is likely that such measures would primarily be applied to the airport related development on the Northern Grass area and any landside components of development that are not the subject of specific lighting design requirements. Lighting design will provide additional information to supplement, but not supersede, the assessments made in Chapter 11 Landscape and Visual of the ES (Document reference TR020002/APP/5.2-2).
Criticism of Proposed Development proposals	<p>Some of the respondents were critical of the proposals for night flights and requested that RiverOak be careful, honest and flexible when developing the Proposed Development proposals.</p> <p>78 respondents expressed doubt that the limit on night flights included in the proposals would not be adhered to in reality with some of these respondents expressing concern that the impact of them could not be mitigated. 1 respondent suggested that the proposals had not been properly scrutinised by political representatives.</p> <p>33 respondents suggested that night flights were a concern for local residents. Some of these respondents suggested that the Proposed Development proposals should be developed without</p>	Y	RiverOak is proposing a night time policy which imposes movement limits combined with measures to reduce noise. Further information can be found in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4).

	night flights with these being added at a later date if they are needed.		
Impact Assessment	<p>A number of respondents raised concerns about the impact assessment produced as part of the consultation materials.</p> <p>22 respondents were critical of the amount and quality of information given in the impact assessment, for example detail relating to noise, vibration and the number of night flights needed.</p> <p>10 respondents considered that the impact assessment carried out was inconclusive. In particular some respondents requested that an LAeq, 1hr level is presented in the ES, or mitigation is included in the ES to limit one flight per hour during the hours of 11pm-7am.</p> <p>4 respondents asked for the need for night flights to be better demonstrated.</p> <p>3 respondents requested more information be provided on quiet aircraft and how restrictions on noisy or old planes would be put in place.</p> <p>1 respondent questioned whether the area identified as being affected was correct.</p> <p>1 respondent suggested the impact assessment needed to be widened to include the impact of road, warehousing and other traffic.</p>	Y	The PEIR was acknowledged to be incomplete as it is the assessments that have been undertaken at the time of publication. Further work has been undertaken on the effects of the project and the Environmental Statement contains all the additional work.

<p>General Opposition to night flights</p>	<p>A large number of responses expressed a general opposition to any flights at night and some of respondents suggested imposing restrictions to prevent night flights. 1 respondent suggested RiverOak should avoid taking on operators that would need night flights</p> <p>76 respondents also commented that night flights lacked and would damage local support for the Proposed Development as a whole. 2 respondents noted that they would support the Proposed Development if there were no night flights and 2 respondents commented that they considered the Proposed Development would only have social benefits if there were no night flights.</p> <p>1 Respondent also noted that opposition to the Proposed Development would increase as the number of night flights increase and would depend on the amount of noise produced by the aircraft.</p> <p>14 respondents expressed a general opposition to the Proposed Development as a whole particularly if the airport would not be viable without night flights.</p>	<p>N</p>	<p>While we acknowledge the level of concern about night flights we are proposing that a limited number be permitted, but these will be controlled.</p> <p>RiverOak is proposing a night time policy which imposes movement limits combined with measures to reduce noise. Further information can be found in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4).</p>
<p>General Opposition to night flights - Noise</p>	<p>A number of respondents expressed a general opposition to night flights on the basis of the noise they would cause and the impact this would have on local residents, particularly those living under the proposed flight path.</p>		<p>The potential noise effects resulting from the Proposed Development have been assessed in Chapter 12: Noise of the ES (document reference TR020002/APP/5.2-1). A summary of the significant residual effects is provided at Section 12.10. Based on this assessment, RiverOak has developed a Noise Mitigation Plan to reduce noise effects (document reference TR020002/APP/2.4). The impact of noise on wildlife, ecosystems and biodiversity is</p>

			assessed in Chapter 7: Biodiversity of the ES (document reference TR020002/APP/5.2-1).
Health	<p>A large number of the respondents were concerned that night flights and the associated noise would negatively impact the health of local residents, in particular children and the elderly, and tourists. Potential health impacts raised by respondents included:</p> <ul style="list-style-type: none"> • Effects on mental health; • impairment of learning in children; • impact on the cardiovascular system including increased risk of high blood pressure, heart disease, heart attacks and strokes; • increased risk of dementia; • reduced lifespan; • insomnia and interruptions to sleep and the impact this has on mental and general health and quality of life; • impact on health caused by pollution and aviation fumes • impact on cognition <p>In support of these comments, respondents cited evidence from the World Health Organisation and the Aviation Environment Federation.</p> <p>Several respondents commented that night flights, and the resulting loss of sleep would seriously affect the quality of their work and family life with some</p>	Y	<p>The Health Impact Assessment (Appendix 15.1) and Chapter 15: Health and Wellbeing of the ES (document reference TR020002/APP/5.2-13 and 5.2-2, respectively) have assessed potential effects due to air pollution and noise associated with the Proposed Development. Health outcomes assessed include cardiovascular and respiratory diseases and mortality, mental health and dementia. Where adverse effects are predicted, measures to mitigate these are set out in Chapters 12 and 15 of the ES (document reference TR020002/APP/5.2-2).</p> <p>With regard to children's learning, the Noise Mitigation Plan (document reference TR020002/APP/2.4) specifies that reasonable levels of noise insulation and ventilation for schools within the 60 dB $L_{Aeq}(16\text{ hour})$ day time contour will be provided.</p>

	<p>respondents commenting that they would need to move house if night flights were allowed.</p> <p>A number of respondents suggested that any proposals for night flights should be subject to a Health Impact assessment by independent experts.</p>		
Quality of life	A number of respondents raised the concern that night flights would have a negative impact on the quality of life for local residents.	Y	Potential for sleep disturbance has been assessed in Chapter 12: Noise and Vibration and also in the Health Impact Assessment in Appendix 15.1 of the ES (document reference TR020002/APP/5.2-2 and 5.2-13 , respectively). No significant effect on sleep disturbance is predicted due to the anticipated low number and noise of night-time flights.
Impact on tourism and leisure	34 respondents were opposed to night flights on the basis that they would negatively impact on the leisure and tourism industries in particular in Thanet and Ramsgate.	N	<p>The effects on tourism are discussed within Chapter 13: Socio-Economics of the ES (document reference TR020002/APP/5.2-2). Tourism receptors in the vicinity of the Proposed Development may experience effects resulting from the increased activity in the geographical area, in both construction and operational phases. For tourism businesses within the surrounding area, the increased visitor numbers associated with the airport operation, in conjunction with increased incomes from employees at Manston, will likely lead to increased demand for tourism facilities and associated spending in the locality. This could result in improvements to their volume of trade.</p> <p>In terms of indirect impacts, such as increased traffic, noise or dust, detailed assessments have been undertaken in Chapter 6: Air Quality, Chapter 12: Noise and Chapter 14: Traffic and Transport of the ES (document reference TR020002/APP/5.2-1 – 5.2-2). The negative effects on tourism are commonly observed to be related to noise and traffic.</p>

			<p>The effects of noise on tourist businesses will be minimal as the increase in urban areas will be small compared to existing sources. Aircraft noise will increase at the main beach in the centre of Ramsgate which is already subject to urban noise but there will be no noticeable noise increases at any other Kent beaches.</p> <p>Outside these areas the effects will depend on existing background levels but in general are considered sufficiently low not to affect the level of business activity or value. The site is well connected by road and rail and traffic increases are assessed to be minimal. The effects of traffic on tourism are considered to be low and will not affect the level of business activity or value.</p>
Impact on local area	A number of respondents raised concerns about the effect night flights would have on the local area. For example, some respondents suggested that night flights would negatively affect the ambience and prospects of the local area and hinder regeneration. Other respondents raised concerns that night flights would negatively impact local businesses.	Y	<p>We recognise that Ramsgate is the town that is most affected by aircraft noise and have included a series of commitments in our Noise Mitigation Plan (document reference TR020002/APP/2.4) to minimise this. This includes a commitment to prioritise flights from the west of the airport (subject to factors such as wind speed and direction) and the requirement for aircraft to operate in a low power/low drag configuration (subject to ATC speed control requirements and safe operation).</p> <p>However the Proposed Development should bring benefits to Ramsgate too, such as additional businesses locating in the area, direct and indirect employment opportunities, convenient access to an airport and increased tourism. A full assessment of the socio economic benefits that the Proposed Development would bring can be found in Chapter 13 of the ES (document reference TR020002/APP/5.2-2).</p>
Impact on Property values	A number of respondents raised concerns about the potential for night flights to negatively affect property values in the local area.	N	RiverOak will abide by all of its obligations under the national compensation code. Compensation measures are discussed in the Noise Mitigation Plan (document reference TR020002/APP/2.4).

	<p>8 Responses suggested that compensation should be given for loss of property value caused by night flights.</p> <p>3 respondents suggested that night flights would make local property hard to let which would negatively impact local businesses.</p>		
Environmental impacts	<p>The environmental impacts of night flights were raised 126 times in the responses. Respondents expressed opposition to night flights on the basis that they would have a negative impact on the local environment, in particular in Ramsgate.</p> <p>Many of these respondents were concerned about air pollution with some raising concerns about aviation fumes entering residents' homes.</p>	Y	As well as noise monitoring and noise restrictions, RiverOak has agreed to fund the reinstatement of the monitoring station downwind of the airport (ZH3 Thanet Airport) to ensure that air quality effects are appropriately monitored and minimised as needed.
Use of s106 obligations	<p>17 respondents commented on the use of s106 obligations to control night flights.</p> <p>16 of these respondents suggested that there should be a robust s106 agreement put in place to control the timings and noise levels of night flights and to impose financial penalties for any breach.</p> <p>1 of the respondents criticised the reposition of the terms of the previous s106 agreement arguing that the restrictions in the agreement were unrealistic, naïve and contributed to the lack of commercial success of the airport.</p>	Y	RiverOak is replacing the conditions of the 2000 s.106 agreement with the modern equivalents set out in our Noise Mitigation Plan (document reference TR020002/APP/2.4) which, where necessary, will be monitored and enforced with the use of modern monitoring equipment.
Monitoring	<p>12 Respondents suggested that night flights should be monitored by an external body to ensure legal restrictions are complied with.</p>	Y	RiverOak will be providing ongoing noise monitoring once the airport is operational.

Table 8.15: Summary of issues raised in community consultation in response to Question 7 of the Feedback Form and how RiverOak had regard to the responses

Question 7: Do you have any other comments about our proposals for re-opening Manston Airport?

Topic	Issue raised	Change? Y / N	Regard had to response
General Support	535 respondents stated general unqualified support for the Proposed Development, with 183 of those stating specifically either that the Proposed Development should go ahead “now”, “asap” or “before Brexit is implemented”.	N	RiverOak notes and welcomes this response.
General Support – Preferred Use	128 respondents stated that the use of the area as an airport is preferable to any other use for the area. Examples of uses that respondents considered less preferable were housing and a business / science park.	N	RiverOak notes and welcomes this response.
Conditional Support	21 respondents stated their conditional support for the airport, with 9 of those expressly stating that they would support the airport if there were no night flights. A further 5 individuals stated that they would support the airport if either there were fewer flights or quieter planes.	Y	RiverOak understands the concerns that some people have about noise and night flights, For this reason, RiverOak is proposing a night time policy which imposes movement limits combined with measures to reduce noise. Further information can be found in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4).
General opposition	198 respondents stated their general opposition to the Proposed Development, with 140 of those being outright opposition with no reasons given in response to this question. Of the remaining 58 who did give a reason, 24 of those commented that Manston was not	N	RiverOak notes this response although it disagrees.

	needed and had passed its time, 15 commented that it was a waste of public money, and 10 respondents suggested that support had been overinflated.		
General opposition – RiverOak concerns	177 respondents raised concerns about the promoter of the Proposed Development, RiverOak Strategic Partners. Comments were wide ranging but generally focussed on the following five main issues: (1) lack of background information about the promoter; (2) accusations that the promoter is operating a scam in order to acquire the land and turn it into a housing development; (3) implying fraudulent activity either previously by RiverOak’s employee or through the fact that its financial backing is from Belize; and (4) concern about lack of clarity about funding.	N	This consultation was conducted in accordance with the rules and regulations relating to consultation with a primary focus on environmental matters. RiverOak denies and dismisses all allegations of fraud and “scam”. A Funding Statement (document reference TR020002/APP/3.2) sets out how the Proposed Development will be funded.
Interaction with other airports	93 respondents commented on the interaction between Manston and other airports. 80 of these suggested that Manston would take the pressure of other airports in the South East; 10 commented that freight capacity elsewhere is sufficient; 1 suggested that Manston will not be required as nearby Lydd Airport is expanding; and 5 commented that Manston cannot compete with other airports.	Y	A detailed review of other airports in the South East is included in the Azimuth Report in Volume 1 (document reference TR020002/APP/7.4) and shows that Manston is the only option for a dedicated air freight hub in the South East.
General support – business case	99 respondents expressed their general support for the Proposed Development’s business case. Of these, 30 commented that Manston is too important to lose, including in terms of its existing facilities; 27 commented that Manston is an important asset in the national interest, in particular in relation to defence and national security; 23 commented that Manston is important for	N	RiverOak notes and welcomes this response.

	trade and expanding freight capacity with 6 of these stating this was even more important in the light of Brexit; 13 commented that Manston is better located than other airports as it will disturb fewer people and is well located with regards to the Continents and within the UK; and 1 respondent commented that the aircraft repair facilities make the business case stronger.		
Opposition – to business case	<p>331 respondents voiced their opposition to the business case. The most commonly stated reasons were:</p> <ul style="list-style-type: none"> - Manston Airport has never been a commercial success/flawed business model (142); - the business case is lacking in appropriate detail e.g. no justification for why Manston is an NSIP (49); - the business case is unviable (44); and - the predicted usage will fall due to Brexit lowering demand (27). <p>Other comments related predominantly to seeking guarantees in relation to funding, claims that the Proposed Development includes too much public investment, and assumptions being overly relied upon, especially that of the number of aircraft movements needed to transport given tonnage being exaggerated.</p>	N	For many years, Manston Airport operated without investment in infrastructure required for a state-of-the-art freight hub. Comparisons between past operations and the proposed plan for Manston cannot be made. The Azimuth Report (document reference TR020002/APP/7.4) make a clear case for the need for and future of the airport. The impact of Brexit is not possible to fully determine until negotiations with the EU are complete. However, trading further afield than mainland Europe will make the transport of goods by HGV impractical. The use of air freight is therefore likely to increase as the UK trades with emerging economies as well as existing markets.
Not an NSIP	2 respondents commented that RiverOak had failed to demonstrate that the Proposed Development was in the national interest and that it needed a DCO.	Y	The justification for the Proposed Development needing consent via a DCO can be found in the NSIP Justification document (document reference TR020002/APP/2.3) .

Opposition – wrong location in the country	41 respondents commented that Manston was in the wrong location within the UK i.e. that it is not centrally located.	N	Manston is in the south-east of England, which is the area of greatest demand, and has direct access to the trunk road network. It will complement airports in other parts of the UK such as East Midlands Airport and will reduce the need for cargo to be trucked through the channel tunnel and flown to and from continental airports.
Opposition – wrong location locally	13 respondents commented that Manston was in the wrong location locally, with 12 of these respondents suggesting it was located badly in relation to residential areas, and 1 suggesting it was poorly located in relation to schools.	N	Manston is in the ideal local location because it is an existing airport that operated for 98 years before it closed. To create a new airport nearby would cause considerable additional disruption and expense.
Economic benefits	221 respondents commented that the Proposed Development would bring economic benefits to the Thanet and South East area.	N	RiverOak agrees with this comment. Further information about the economic implications of the Proposed Development is provided in Chapter 13 of the ES (document reference TR020002/APP/5.2-2) and the Azimuth Report Volume 4 (document reference TR020002/7.4).
Economic impacts	54 respondents commented that the Proposed Development would have economic impacts on the area, with particular concerns mentioned being job losses in the tourism and hospitality industries as well as difficulties for those who work from home due to noise concerns.	N	Information about the economic implications of the Proposed Development is provided in Chapter 13 of the ES (document reference TR020002/APP/5.2-2). The effects on tourism are also discussed within Chapter 13: Socio-Economics of the ES (document reference TR020002/APP/5.2-2). Tourism receptors in the vicinity of the Proposed Development may experience effects resulting from the increased activity in the geographical area, in both construction and operational phases. For tourism businesses within the surrounding area, the increased visitor numbers associated with the airport operation, in conjunction with increased incomes from employees at Manston, will likely lead to increased demand for tourism facilities and associated spending in

			<p>the locality. This could result in improvements to their volume of trade and negate job losses.</p> <p>In terms of indirect impacts, such as increased traffic, noise or dust, detailed assessments have been undertaken in Chapter 6: Air Quality, Chapter 12: Noise and Chapter 14: Traffic and Transport of the ES (document reference TR020002/APP/5.2-1 – 5.2-2). The negative effects on tourism are commonly observed to be related to noise and traffic.</p> <p>The effects of noise on tourist businesses will be minimal as the increase in urban areas will be small compared to existing sources. Aircraft noise will increase at the main beach in the centre of Ramsgate which is already subject to urban noise but there will be no noticeable noise increases at any other Kent beaches.</p> <p>Outside these areas the effects will depend on existing background levels but in general are considered sufficiently low not to affect the level of business activity or value. The site is well connected by road and rail and traffic increases are assessed to be minimal. The effects of traffic on tourism are considered to be low and will not affect the level of business activity or value.</p> <p>Additionally, the RPS Housing and Employment Land Technical Report (March 2018), Appendix 6 of the Planning Statement (document reference TR020002/APP/7.2) concludes that the new jobs at the airport could be taken by local people already living in the area.</p>
Community benefits – general and air shows	46 respondents mentioned the importance of Manston Airport as part of the history and heritage of the Ramsgate and Thanet areas. A further 15 respondents made comments in support of air shows being held at the airport, including 4 respondents who stated that the	N	RiverOak's view is that Manston's long history as an airport and its contribution on both world wars should be acknowledged.

	grand opening of the airport should feature the Red Arrows and a party.		<p>RiverOak supports air shows in principle but points out that they are not compatible with the operation of a busy airport. Ultimately the decision would lie with the CAA.</p> <p>RiverOak accepts that there should be a grand re-opening event and will seek to make it as spectacular as possible.</p>
Community impacts – general	<p>254 respondents raised general concerns about the impacts of the Proposed Development on the community. These concerns included:</p> <ul style="list-style-type: none"> - inability of residents to use their gardens / having to keep windows shut; - devaluation of property; - risks of the area becoming a London commuter town; - damage to property from noise and vibration; - destroying Ramsgate harbour area and historic centre; and - terror risk. 	Y	<p>The potential noise effects resulting from the Proposed Development have been assessed in Chapter 12: Noise of the ES (document reference TR020002/APP/5.2-1). A summary of the significant residual effects is provided at Section 12.10. Based on this assessment, RiverOak has developed a Noise Mitigation Plan to reduce noise effects (document reference TR020002/APP/2.4). The impact of noise on wildlife, ecosystems and biodiversity is assessed in Chapter 7: Biodiversity of the ES (document reference TR020002/APP/5.2-1).</p> <p>The effect of major accidents and disasters is assessed in Chapter 17 of the ES (document reference TR020002/APP/5.2-3).</p>
Education	17 respondents commented on Educational opportunities with suggestions including RiverOak / the airport providing scholarships, training or 'on the job' skills training for local children and schools.	N	RiverOak are keen to work with all providers to ensure training and education is in place to support local people. This will cover a wide range of opportunities including apprenticeships.
Employment	173 respondents commented on the employment benefits of the Proposed Development. 16 of those said that it would help tackle youth unemployment and encourage graduates to stay in the area, and 10 suggested that RiverOak advertise jobs to local residents first or that they use local about. 4	Y	The Azimuth Report (document reference TR020002/APP/7.4) considers a study on Luton Airport, where it was found that employees on-site tend to live locally. Full details of employment forecasts are in the Azimuth Report at Volume IV. It describes how the number of jobs created by airport operations at Manston has been forecast. Direct on-site jobs are predicted to be 2,150 by Year

	<p>respondents asked for more information to be provided about the number of Thanet residents predicted to be employed at Manston.</p> <p>73 respondents commented on the impact on employment that the Proposed Development would have, with particular comments being raised about the accuracy of the predicted number of jobs and the fact that jobs at the airport would be low skilled and low quality.</p> <p>3 respondents suggested that other uses of the site would create more jobs.</p>		<p>5, of which the airport operator will create 697 posts. The direct employment figure is forecast to rise with increasing freight tonnage and passenger numbers. By Year 5, the indirect and catalytic jobs forecast to result from the operation at Manston Airport are 3,870 and 8,600 respectively. Forecasts for Year 20 are approximately 3,420 direct jobs, 6,150 indirect/induced jobs and 13,700 catalytic jobs. These figures represent a wide range of long-term, aspirational career opportunities.</p> <p>Further information about the economic implications of the jobs being created is provided in Chapter 13 of the ES (document reference TR020002/APP/5.2-2).</p>
<p>Environmental impact and mitigation - general</p>	<p>92 respondents raised general concerns about the environmental impact of the Proposed Development, including:</p> <ul style="list-style-type: none"> - impact of increased aircraft use; - being too environmentally damaging to be near urban centres; - plane cargo emits 100 times more carbon than sea cargo; - fuel dumping/dispersal over residents and the local area (black scum on trees, plants, buildings); - smell of aviation fuel; - threatens the conservation nature of the area; - threatens the natural coastline; - contamination from aircraft scrapyard; - flight path over a conservation area; 	<p>N</p>	<p>The environmental impacts of the Proposed Development, including all those listed on the left, have been addressed in Chapters 6 – 17 and their associated appendices of the ES (document reference TR020002/APP/5.2-1 – 5.2-17). This has looked at impacts both on and off-site from the Proposed Development. Adverse effects have been mitigated with measures incorporated into the development.</p> <p>Greenhouse gas emissions from the Proposed Development and the associated impact on the UK's climate change target has been assessed in Chapter 16. A Carbon Minimisation Action Plan has been committed to. This will reduce the impact of the Proposed Development on the climate where practicable and will be put in place prior to the commencement of site works.</p>

	<ul style="list-style-type: none"> - airport not in-keeping with climate change targets; - impact of contrails; - area recovering from previous airport contamination; - environmental costs of fuel transport; and - concerns over light pollution. 		
Environmental impact and mitigation – noise	<p>253 respondents commented on the noise impacts of the Proposed Development, including 7 who raised concerns about the noise created by lorries and HGV vehicles. Of these:</p> <ul style="list-style-type: none"> - 1 suggested that noise based levels should be monitoring in villages under the flight path including Marshside and Chislet; - 1 raised concerns that Brexit would result in the withdrawal of EU legislation banning noise polluting planes; - 1 suggest that there should be restrictions on the types of planes allowed to the use the airport with only the quietest and most environmentally friendly planes being allowed to operate; - 1 suggested that underground power cables be provided to the aircraft stands to prevent noise from generators; and - 1 commented that people would get used to the noise. 	N	The Noise Mitigation Plan (document reference TR020002/APP/2.4) includes a series of mitigation measures which will limit the noise impact on residents including the introduction of a night time noise based quota limit, the prohibition of the noisiest QC8 and QC16 flights at night time and the provision of insulation for properties affected by noise. Fixed electric ground power will be provided to reduce the noise associated with generators used for planes on stand.
Environmental impact and	<p>285 respondents raised concerns about the health impacts of the Proposed Development, both physical and mental. Specific concerns included:</p>	N	The Health Impact Assessment (Appendix 15.1) and Chapter 15: Health and Wellbeing of the ES (document reference TR020002/APP/5.2-13 and 5.2-2) have assessed potential effects

<p>mitigation: health</p>	<ul style="list-style-type: none"> - high blood pressure; - stress; - increased hyperactivity in children; - sleep deprivation; - air pollution and respiratory diseases; - falling debris; - chronic fatigue; and - the radar specifically affecting health. 		<p>on physical and mental health and wellbeing, including cardiovascular and respiratory diseases and mortality, depression or anxiety, and qualitatively reported mental wellbeing. Some adverse impacts due to noise and air pollutant emissions are predicted, and measures to mitigate these are set out in the ES (document reference TR020002/APP/5.2). Beneficial effects due to employment generation, supply chain spending and connectivity are also predicted, and measures to enhance these are set out in the ES.</p>
<p>Environmental impact and mitigation: emissions</p>	<p>153 respondents raised specific concerns about emissions, mainly from the planes but also from lorries and HGVs. 1 respondent commented that Manston Airport would help lower CO2 emissions by reducing journeys to airports further afield.</p> <p>In addition to this, 1 respondent requested that the impact and mitigation of the air pollution impact from additional traffic and congestion caused by Manston Airport be considered.</p>	<p>N</p>	<p>Greenhouse gas emissions from the Proposed Development and the associated impact on the UK's climate change target has been assessed in Chapter 16 (document reference TR020002/APP/5.2-3). A Carbon Minimisation Action Plan has been committed to. This will reduce the impact of the Proposed Development on the climate where practicable and will be put in place prior to the commencement of site works.</p> <p>The air quality effects resulting from the Proposed Development have been assessed in Chapter 6: Air Quality of the ES (document reference TR020002/APP/5.2-1). The assessment shows that air quality will remain comfortably within legal limits. These legal limits are themselves based on World Health Organization guidance on health effects, allowing for the most vulnerable members of society. The air quality impacts of the airport are small and confined to the vicinity of the airfield and certain major roads. The impact of air quality on wildlife, ecosystems and biodiversity is assessed in Chapter 7: Biodiversity of the ES (document reference TR020002/APP/5.2-1) and is shown to be not significant.</p>

			In general, most airport-related traffic is on trunk roads leading west so little extra congestion in the urban area of Thanet is expected, as set out in the transport Chapter of the ES, Chapter 14 (document reference TR020002/APP/5.2-2).
Environmental impact and mitigation: visual	3 respondents commented that the Proposed Development would have a detrimental visual impact either by the airport being a visual eyesore or by detracting from the natural beauty of the area.	N	Changes to the landscape character and views are assessed in the Landscape and Visual Impact Assessment, which is provided in Chapter 11 of the ES (document reference TR020002/APP/5.2-2).
Environmental impact and mitigation: wildlife	15 respondents raised concerns about the effect of the Proposed Development on the wildlife and biodiversity of the area, including on Pegwell and Sandwich Bays and Hacklington and Stodmarsh Marshes.	N	<p>The following sites have been included within the initial screening process within the 'Report to Inform the Appropriate Assessment' (RIAA), which documents the HRA work (included as Appendix 7.1 of Chapter 7 Biodiversity of the ES (document reference TR020002/APP/5.2-6).</p> <ul style="list-style-type: none"> - Thanet Coast and Sandwich Bay Special Protection Area (SPA); - Thanet Coast and Sandwich Bay Ramsar; - Thanet Coast Special Area of Conservation (SAC); - Sandwich Bay SAC; - Outer Thames Estuary Marine SPA; - Margate and Long Sands SCI (Inshore Marine); - Stodmarsh SPA; - Stodmarsh SAC; - Stodmarsh Ramsar; and - Blean Complex SAC. <p>More detailed consideration on the effects of the Proposed Development on the qualifying features of the Thanet Coast and Sandwich Bay SPA/Ramsar and the Sandwich Bay and Thanet Coast SACs have also been included in the RIAA. Effects on their constituent Special Sites of Scientific Interest (SSSI), including the</p>

			<p>Sandwich Bay to Hacklinge Marshes SSSI has been undertaken in the ES (document reference TR020002/APP/5.2-1) (Chapter 7 Biodiversity), but also considered (in terms of their linkages to the SPAs/SACs) in the RIAA.</p> <p>All of the adverse effects the Proposed Development could potentially have on biodiversity are first identified (e.g. noise and air pollution from planes, increased traffic etc.). The impact of each of these different effects (noise, pollution etc.) on each wildlife feature (bird, animal, habitat etc.) for which these wildlife sites are designated is assessed, taking into account any mitigation measures that form part of the design of the development. The assessment then concludes to whether there is predicted to be any adverse impact on these wildlife features (for example: will noise from aircraft result in a decline in the population of turnstone) using results from research, studies and surveys undertaken. If an adverse impact is predicted, further mitigation to reduce or eliminate the impact is then recommended.</p>
Environmental impact and mitigation: water	6 respondents raised concerns about the effect of the Proposed Development on the aquifer and the freshwater environment.	N	<p>The Hydrogeological Impact Assessment, Appendix 8.1 of the ES (document reference TR020002/APP/5.2-7) includes an assessment of the risk to the groundwater environment from activities and suggests appropriate measures that are included in the CEMP, Appendix 3.2 of the ES (document reference TR020002/APP/5.2-6) and implemented in the construction phase / incorporated into the site's design.</p> <p>Proposed mitigation is also discussed in the mitigation section of Chapter 8 in the ES (document reference TR020002/APP/5.2-1).</p>
Flight paths	7 respondents made comments about the flight paths: 3 of these were negative and 4 were positive: - 2	N	<p>RiverOak has assessed flight 'swathes' and local residents can be reassured that the flights will be kept to those swathes. Should the applied for DCO be granted, RiverOak will develop and submit an</p>

	<p>requested that there be no training flights circling the countryside, towns and villages;</p> <p>- 1 suggested that the flight path be modified so that it is over a less populated area; and</p> <p>- 4 commented that the flight paths over the sea would minimise the negative effects on residents.</p>		<p>airspace change proposal (ACP) to the CAA. Under the ACP, the CAA will expect the airport to develop proposals which seek to quantify and minimise environmental impact. The process includes a further round of environmental impact assessments and public consultation on the specific flightpaths being proposed. Proposed flightpaths will have to be within the proposed swathes; if RiverOak wishes to propose flightpaths which are beyond these then we will have to apply to amend the DCO to match them.</p>
<p>Flight times and numbers:</p>	<p>7 respondents commented about the flight times and numbers with 2 of these requesting further information about the airport's operating hours and the spread of flights throughout the day. The remaining 5 respondents raised concerns about the proposed increase in flights in comparison to the previous use at the airport.</p>	<p>Y</p>	<p>The airport will mainly operate during daytime hours of 0700 to 2300, although there may be some night flights which will be limited by the measures set out in the Noise Mitigation Plan (document reference TR020002/APP/2.4). The Azimuth Report (document reference TR020002/APP/7.4) sets out the expected quantity, mix and timing of aircraft.</p>
<p>Passenger flights</p>	<p>102 respondents commented on the proposals for passenger flights with all of these comments being supportive. There was specific support/preference for certain providers (KLM, Newmarket Holidays) as well as for certain destinations (Edinburgh, Exeter, Cyprus, Manchester, Leeds - Bradford, Scotland, Amsterdam, Malaga, Southern France, Newquay, Aberdeen, Exeter, Arrecife, Paris, Brussels). In addition:</p> <p>- 1 respondent provided support for helicopter taxis for business users;</p> <p>- 1 suggested that flights are limited e.g. Thursday to Sunday; and</p>	<p>N</p>	<p>Although the emphasis of the project is on cargo flights, it is expected that there will also be limited passenger flights, primarily to European destinations.</p>

	- 2 respondents stated their support for passenger but not freight flights.		
Night flight impacts	101 respondents commented on night flights, 90 of which suggested that there should either be no night flights or that there should be a strict cap on night flights as any such flights would reduce quality of life. 9 respondents raised questions about the number of night flights over Ramsgate per night, and 2 respondents commented that their property was purchase based on a s.106 agreement which stipulated that there could be no night flights.	Y	RiverOak is proposing a night time policy which imposes movement limits combined with measures to reduce noise. Further information can be found in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4).
Tourism benefits and impacts	223 respondents commented on both the tourism benefits and impacts of the Proposed Development. 205 commented that the impact would be negative as the noise, pollution and spoiled tranquillity would damage Ramsgate's and the surrounding areas reputation as a tourist attraction. 18 respondents comments that that impact would be positive, suggesting that the airport would bring tourists to the area for big events and that the airport would be an attraction in itself i.e. for plane watchers.	N	The effects on tourism are discussed within Chapter 13: Socio-Economics of the ES (document reference TR020002/APP/5.2-2). Tourism receptors in the vicinity of the Proposed Development may experience effects resulting from the increased activity in the geographical area, in both construction and operational phases. For tourism businesses within the surrounding area, the increased visitor numbers associated with the airport operation, in conjunction with increased incomes from employees at Manston, will likely lead to increased demand for tourism facilities and associated spending in the locality. This could result in improvements to their volume of trade. In terms of indirect impacts, such as increased traffic, noise or dust, detailed assessments have been undertaken in Chapter 6: Air Quality, Chapter 12: Noise and Chapter 14: Traffic and Transport of the ES (document reference TR020002/APP/5.2-1 – 5.2-2). The negative effects on tourism are commonly observed to be related to noise and traffic.

			<p>The effects of noise on tourist businesses will be minimal as the increase in urban areas will be small compared to existing sources. Aircraft noise will increase at the main beach in the centre of Ramsgate which is already subject to urban noise but there will be no noticeable noise increases at any other Kent beaches.</p> <p>Outside these areas the effects will depend on existing background levels but in general are considered sufficiently low not to affect the level of business activity or value. The site is well connected by road and rail and traffic increases are assessed to be minimal. The effects of traffic on tourism are considered to be low and will not affect the level of business activity or value.</p>
Masterplan layout	<p>15 respondents commented on the masterplan layout as follows:</p> <ul style="list-style-type: none"> - clarification requested as to whether the land between the A253 and the A299 will be included in the DCO; - suggestion that spectator parking be put along the A253/A299 boundary; - suggestion that there should be a large space between the two warehouses; - comments that plans do not take bridle path TR8 into account from junction of Manston Road and Manston Court Road; - suggestion that aircraft recycling facility should be positioned so as not to be visible; - suggestion that air traffic control tower should be taller to allow clear sightlines to runway; 	Y	<p>RiverOak has sought to provide responses to the comments made:</p> <ul style="list-style-type: none"> • The extent of land acquisition is shown on the DCO application drawings and site masterplan (document reference TR020002/APP/4.14 and 7.1). Note the 'Order Limits' represents the area over which both ownership and rights of access are being sought. • The runway will be visible from the Passenger Carpark area, specific viewing areas could be incorporated into the detailed design. The level difference along the A299 (southern) boundary would make a viewing area difficult. • A space has been allowed between the two cargo facilities. The location and size of this is not fixed. • Public Rights of way affected by the works have been diverted, these are shown in the latest DCO documents. • A landscape and visual impact assessment has been undertaken as part of the DCO process including wireline views from strategic areas. • The Air Traffic Control Tower has been located and sized so that both runway ends are visible from the viewing area.

	<ul style="list-style-type: none"> - suggestion that plans for ponds are on too steep a gradient; - suggestion that there should be no uncovered open water due to mosquito fears; - request that parking of aircraft does not affect operations; and - comment that fuel bowsers crossing the runway to connect to feeder stations may cause issues with CAA/NATS. 		<ul style="list-style-type: none"> • The detailed design of the attenuation ponds will take account of local ground conditions and required capacity. • The attenuation ponds will incorporate aerators which will make mosquitos unlikely. Management of pest species can also be undertaken if necessary. • Sufficient aircraft stands have been included within the masterplan to avoid conflicts between taxiing and parked aircraft • The benefit of having airside fuel bowsers which do not use the public highway network outweighs the operational constraints of having vehicles cross the runway. Additionally an airfield perimeter track will be installed although bowser use of this is not currently envisaged.
Masterplan - runways	<p>9 respondents commented on the runway. Of these:</p> <ul style="list-style-type: none"> - 6 suggested that the runway be extended to the west or re-aligned to allow for higher take-offs over Ramsgate; - 1 queried why only 1 runway was being proposed; - 1 suggested that a displaced threshold should be implemented together with a glide slope of greater than three degrees to minimise noise on approach; and - 1 suggested that a small grass runway should be provided for light aircraft. 	N	<p>RiverOak has considered the potential environmental benefits of extending the runway to the west and increasing the approach angle above 3 degrees. Due to the close proximity of Ramsgate the benefits of anything less than a 1 kilometre extension are minimal. Even increasing approach angles to 3.5 degrees (beyond which additional approvals are required) would result in little environmental benefit to those so close to the airport.</p> <p>Clearly, there would be an impact on properties, infrastructure and the environment to the west of the airport if any such proposal was implemented. Equally, the cost of such a proposal is not justified bearing in mind the minimal reduction in environmental impact.</p>
Site operations	<p>19 respondents commented on site operations. Comments included:</p> <ul style="list-style-type: none"> - radar site is not needed until the start of passenger operations (1); 	N	<p>Radar will be required from the outset as it is an essential part of providing a safe environment for airport operations. It will also allow an air traffic services to be provided to aircraft in the vicinity of the airport, including cross-channel traffic, thereby enhancing general aviation safety.</p>

	<ul style="list-style-type: none"> - Instrument Landing System is not needed as GPS/RNAV approaches are sufficient and less expensive to install and maintain (1); - operations to be reviewed in relation to Lasham airport which is similar to these proposals (1); - suggestion that the FIDO system be considered as well as obtaining a direct fuel supply from Richborough and the use of Goodwin Sands for emergency landings (1); - suggestion that there should be an immigrant detention centre near the site which could also be used as a headquarters for Border Force and fly surveillance drones (2); - suggestion that iris recognition system is considered for use at passport control (1); - suggestion that an airport digital force field is installed to disable drones (1); - suggestion that the airport could be used a base for emergency services, coastguard search and rescue, and humanitarian flights (6); - comment that RiverOak should be a pioneer of forward-looking aviation technology (3); and - comments referring to the fact that the airport no longer has an EASA certificate. 		<p>GPS/RNAV procedures will be provided but the carriage of the necessary on-board equipment and qualification of pilots is not yet universal, particularly in the air-freight fleet. An Instrument Landing System (ILS) capability is therefore being included to ensure the airport is available to all operators.</p> <p>Elements of the Lasham operation are similar but it is not operating to the same level nor are its aircraft required to meet a schedule in the same way as that proposed for Manston. That said, wherever possible the Proposed Development is seeking to employ examples of best practice seen elsewhere across the industry in the UK and abroad.</p> <p>The level of operational capability being proposed (ILS Category III) and GPS/RNAV approaches, negate the need for a system such as FIDO. Emergency procedures will be developed as part of our operational planning but it is not envisaged to use areas such as the Goodwin Sands.</p> <p>RiverOak are aware of the challenges associated with drone operations near commercial airports. We will continue to monitor regulatory changes associated with drone operations.</p> <p>With regard to technology, Manston will use the latest approach procedures (GPS/RNAV) whilst retaining more conventional capabilities (ILS) for aircraft that are not suitably equipped. RiverOak are also considering the potential use of Remote Tower technology as a means of providing air traffic control services but such capabilities are only just emerging in the UK and no decisions on this issue have as yet been made.</p>
Site enhancement	57 respondents suggested various site enhancements, including:	N	<p>RiverOak has sought to provide responses to the comments made:</p> <ul style="list-style-type: none"> • The runway will be visible from the Passenger Carpark area, specific viewing areas could be incorporated into the

	<ul style="list-style-type: none"> - a viewing area (8); - a dedicated engine testing area (1); - additional flight facilities e.g. for general aviation (18); - training school for engineers, private pilots, fire service, flight school, maintenance and general aviation (7); - installation of solar panels (3); - installation of ground source heat pumps (1); - store and re-use of water to protect supply (2); - catering for leisure sports (3); - landscape planting (1); - creation of vertical gardens (2); - turn the old 747 into a café (1); - ice rink / skate park (1) - provide adequate parking (4); - hybrid aircraft etc. (2); - car hire (1); and - return of TG Aviation (1). 		<p>detailed design. The level difference along the A299 (southern) boundary would make a viewing area difficult.</p> <ul style="list-style-type: none"> • A dedicated engine test area may be incorporated in future although this has not been allowed for in the current masterplan. • General aviation facilities are included on the eastern end of the runway. • The site building could incorporate training facilities if there is demand and availability for this. • The detailed design of site facilities will include sustainable design elements and follow sustainability principals. • Planting will be provided in strategic locations although bird strike mitigation will take priority. • Other site facilities could be incorporated on the airport related business area provided these are in line with the airfield's described use. <p>RiverOak welcomes the suggestions for site enhancements and whilst it cannot, at this time, confirm that these will be incorporated, it can confirm that they will be considered.</p>
Museums	13 comments were made about the museums, most of which related to suggestions of where the museum should be moved to or assertions that it should remain in the same place. Other comments included suggestions that additional space be given to house exhibitions and that the museums be kept informed. 2	N	An area of approximately 3ha has been safeguarded in the DCO application for operation of the RAF Manston History Museum, Spitfire & Hurricane Memorial Museum and memorial garden. This area encompasses the current museums and memorial grounds and allows for additional areas in which the museums could be expanded or relocated. A decision on whether to proceed with any relocation

	respondents commented that the museums would be overrun by the cargo hub.		works will only be made after consultation with the museum operators to ensure that the museums' needs are reflected. A preliminary meeting was held between RiverOak and the museums on the 26 March 2018.
Preference for alternative uses	223 respondents stated their preference for other uses for the site with the main preferences being: <ul style="list-style-type: none"> - current owner's plans (66) - housing (57) - mixed use (42) - business park (8) - leisure facilities (5) - manufacturing/industrial facilities (3) - renewable energy park (2) - other alternative uses (24) 	N	RiverOak notes this comment but disagrees.
Compensation / mitigation	18 respondents raised comments or queries about what compensation would be given to local residents, ranging from compensation for the loss of value of properties to the cost of insulation and additional glazing. 1 respondent raised concerns that residents would not be compensated for damage to their health.	Y	RiverOak has offered an insulation and relocation package which matches and exceeds Government guidance. The compensation to be made available to residents for insulation purposes exceeds that provided by larger, busier UK airports.
Surface access	400 respondents made comments regarding surface access. Of those, 130 were concerns about inadequate and overburdened infrastructure, and 190 comments related to suggestions that extra traffic must be	N	The Transport Assessment (document reference TR020002/APP/5.2-15) sets out the results of a capacity assessment on the local road network for links and junctions and where it has been found that local roads cannot accommodate the predicted levels of traffic, a mitigation scheme has been proposed.

<p>mitigated and upgrades made to infrastructure. Other comments included:</p> <p><u>Negative:</u></p> <ul style="list-style-type: none"> - Manston is not well connected to the motorway network (5); - Manston has no rail connection (2); - HGVs will damage the roads (3) <p><u>Positive:</u></p> <ul style="list-style-type: none"> - Manston is well connected to the transport network (20); - The airport would decrease traffic needing to use alternative means (7); <p><u>Suggestions:</u></p> <ul style="list-style-type: none"> - Public transport improvements need to be made (5) - Connect Manston Airport to railway lines, either via a railway or a bus link (14) - Any new Thames crossing should allow access to Manston (1) - Pucés Cottages on Spitfire Way should have parking created for properties (3) - Facilities for HGV drivers should be improved (1) 		<p>Improvements to public transport are proposed as part of the development and this is set out in the Airport Surface Access Strategy to support the application. This is appended to the Transport Assessment as Appendix O to document reference TR020002/APP/5.2-25.</p> <p>There are no proposals to create parking at Pucés Cottages.</p> <p>Manston Airport is well connected to the motorway network, and this will be further enhanced with a widening of Manston Road and Spitfire Way. This will allow for vehicles to route from the M2 via duel carriageway (A299) to the very fringe of the airport apron. From the A299 vehicles route north onto Minster Way (also a duel carriageway) in this location and then east onto Spitfire Way, which is proposed to be a 7.3m single carriageway. It is only the last 1km (to the Cargo Access) and 2.77km (to the Airport Terminal Access) that would not be via a duel carriageway stretch of road. It's anticipated that access to the motorway network from the Airport terminal could be as low as 20-22 minutes with the revised proposals.</p> <p>Manston Airport does not have direct rail connections.</p> <p>Dilapidation surveys will be undertaken on the local road network to understand the impact construction HGVs will have on the local road network. The primary route for operational HGVs to and from the Proposed development is Manston Road and Spitfire Way and this will be improved and widened as part of the proposals (Work No 27).</p> <p>There are no proposals to use Cliffsend rail station as a point for rail freight.</p> <p>Further information can be found in the Transport Assessment (document reference TR020002/APP/5.2-15).</p>
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	<ul style="list-style-type: none"> - An additional third lane should be introduced from Gillingham turn off on Thanet Way (1) - Onward distribution of freight should be by rail via new station at Cliffsend (12) 		
Adequacy of consultation	<p>513 respondents raised issues relating to the adequacy of consultation. Of these:</p> <p><u>Positive</u></p> <ul style="list-style-type: none"> - 19 expressly stated that the consultation was adequate <p><u>Negative</u></p> <ul style="list-style-type: none"> - 2 stated that the Summer 2016 consultation was insufficient; - 4 stated that the Summer 2016 was flawed through the use of pro-airport activists at events and intimidating behaviour; - 1 stated that the consultation does not comply with the 2017 Regulations; - 11 stated that the consultation failed to follow provisions of the PA 2008 and Land Compensation Act 1973; - 1 stated that the consultation does not cover the CAA provisions; - 122 stated that not enough people were consulted; - 45 stated that insufficient consideration was given to the effect on Ramsgate; 	N	<p>RiverOak delivered statutory consultation compliant with the SoCC published before Stage 2 and 3 consultation. Each stage of consultation was publicised widely and all documents were made accessible in multiple formats. Further details are set out in section 8 above. The information provided at the time of consultation was the most up-to-date Proposed Development information available at that time. By carrying out three stages of consultation, RiverOak was able to take on board the feedback from each stage and develop its proposals and consultation approach accordingly.</p> <p>RiverOak took on board comments made at Stage 2 in developing its Stage 3 Consultation: further events were provided during the week at Ramsgate and Herne Bay, the communities most affected by noise, and leafleting was extended to 50,000 properties including all those under the flightpath.</p>

	<ul style="list-style-type: none">- 47 stated that the consultation should have been advertised more;- 51 stated that people were deliberately kept uninformed;- 27 stated that they found it difficult to get hold of documents;- 37 stated that the consultation venues were inaccessible, small, not big enough, or that the event was not held for long enough;- 16 stated that RiverOak's lacked sensitivity and that difficult questions were passed over or treated with hostility;- 14 stated that contradictory information was provided;- 19 stated that there was not enough information in the consultation documents about environmental impact, funding, compensation etc.- 14 stated that there was not enough information provided about noise impact and methodology;- 29 stated that there was not enough information provided about flight paths; and- 5 stated that there was not enough information provided on compensation for residents. <p><u>Suggestions</u></p> <ul style="list-style-type: none">- 4 suggested that further positive press should be sought;		
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	<p>- 15 suggested that RiverOak provide ongoing progress reports to local people;</p> <p>Other more general concerns related to issues surrounding the use of the data provided in response to the consultation, the fact RiverOak did not agree to TDC's suggestions for the consultation,</p>		
Request for further information	<p>2 respondents specifically requested further information:</p> <ul style="list-style-type: none"> - on border security benefits for freight by air rather than ferry or lorry; and about when the noise insulation scheme consultation will take place. <p>In addition, 1 person requested more information on 'David Cameron's 5 point plan for Manston' which was announced the day before the election.</p>	N	This information can be provided if more details are given. RiverOak is developing its own proposals rather than adhering to any commitments given in 2015.
Airport Name	<p>5 respondents commented on the name for the airport and infrastructure:</p> <ul style="list-style-type: none"> - keep the Manston name (1); - the airport should be named 'Manston Kent' (1); - Sir Roger Gale MP should be commemorated either by terminal name or road name (3) 	N	The current proposal is to keep the Manston name but RiverOak is open to suggestions.

Summary of Influence on the Proposed Development

- 8.52 The main community issue was aircraft noise and RiverOak have specifically developed a series of commitments to limit and control noise as a result of this, via its Noise Mitigation Plan (**document reference TR020002/APP/2.4**). This has addressed many issues raised such as insulation, community funds and a consultative committee, a night noise quota and 'vortex strike'.
- 8.53 Other issues raised are similar to those raised by statutory consultees, particularly landowners. RiverOak is confident that its forecasts are robust and that the Proposed Development will bring significant economic benefits to east Kent and beyond.
- 8.54 The main criticisms of the way that the consultation was conducted were addressed in the Stage 3 Consultation.

9 STAGE 2: STATUTORY CONSULTATION: PUBLICITY (SECTION 48)

Section 48 Notice

- 9.1 A notice advertising RiverOak's intention to apply for a DCO in respect of the Proposed Development was published in accordance with Section 48 of the PA2008 and Regulation 4 of the Application Regulations. A copy of the Notice can be found at **Appendix 5**. The newspapers in which the Section 48 notice was published and the dates of publication are set out in **Table 9.1** below.

Table 9.1 Section 48 notice: newspaper and dates of publication

Newspaper	Date
Thanet Gazette	Friday 2 June and Friday 9 June 2017
The Times	Friday 2 June 2017
London Gazette	Friday 2 June 2017

- 9.2 In addition to this, a Consultation Advert was placed as follows:

Table 9.2 Consultation Advertisement: newspaper and dates of publication

Newspaper	Date	Coverage
Canterbury Times Series	Wednesday 7 June and Wednesday 14 June 2017	Whitstable, Faversham, Herne Bay, Canterbury
Herald Express Series	Thursday 8 June and Thursday 15 June 2017	Dover, Folkestone, Hythe, Ashford
Thanet Gazette	Friday 9 June and Friday 16 June 2017	Thanet

- 9.3 As stated in the Section 48 notice, the deadline to respond was 23 July 2017. A copy of the notice, as placed in each of the newspapers referred to in **Table 9.2**, is provided at **Appendix 29**.
- 9.4 In accordance with Regulation 11 of the EIA Regulations 2009, RiverOak sent a copy of the Section 48 notice to the prescribed consultation bodies (as defined under the EIA Regulations) on 2 June 2017. A copy of the covering letter can be found at **Appendix 4**. Further information about EIA consultation can be found in Chapter 11 of this Report.

Additional Publicity

Online

- 9.5 Information about the Proposed Development and the consultation was available on the RiverOak website at www.rsp.co.uk and updates were sent using Twitter (@RSPManston) and Facebook (www.facebook.com/RSPManston). RiverOak also produced two videos which were made available on YouTube entitled 'The Case for Manston' and 'How to Participate in the Manston Airport 2017 Consultation'. Further details of these activities can be found in the Stage 2 Media Report at **Appendix 25**.

Press

- 9.6 Press releases were issued to the local press at the start of the consultation and later in the process to encourage participation. Further details of the press releases and press coverage, as well as copies of the newspaper adverts as they appeared in local papers can be found in the Stage 2 Media Report at **Appendix 25**.

Relevant responses

- 9.7 As community consultation under Section 47 was ongoing when the Section 48 notices were published, responses to both were received within the same deadline. Accordingly, details of relevant responses received from members of the public in response to the publication of the Section 48 notice are addressed in Chapter 8 which deals with community consultation.

10 STAGE 3: STATUTORY CONSULTATION: CONSULTATION WITH STATUTORY CONSULTEES (SECTION 42)

Introduction

10.1 This Chapter describes the second statutory consultation RiverOak undertook as prescribed by PA 2008. This period of statutory consultation ran from 12 January to 16 February 2018.

Approach to statutory consultation

10.2 Consultation was carried out fully in line with the published SoCC. The table at **Appendix 49** sets out the consultation as prescribed in the published SoCC and how the Applicant carried out consultation in line with it. Details of the activities undertaken as part of the consultation can be found in the below.

10.3 As set out in paragraph 5.4, RiverOak's approach to this third stage of statutory consultation was to use a wide range of communications methods to consult residents, businesses, prescribed and non-prescribed consultees. A combination of direct mail (letters and emails), media advertising, social media activity and engagement with Local Authorities was used to ensure stakeholders had the opportunity to contribute during the consultation.

10.4 RiverOak aimed to make information regarding the proposals widely available in local libraries, as well as online. Local communities, businesses and other stakeholders would be invited to take part in the consultation, ensuring the views from a diverse range of stakeholders.

10.5 Full details for the activities undertaken during statutory consultation are set out below.

Statutory consultation activities undertaken

10.6 On 11 January 2018 RiverOak wrote to PINS to provide formal notice of its intention to submit the DCO application in accordance with Section 46.

10.7 The letter advised PINS that RiverOak intended to commence a third stage of statutory pre-application consultation on 12 January 2018. A copy of the letter sent to PINS is provided in **Appendix 30**, and a copy of the letter dated 19 February 2018 received from PINS confirming receipt is provided in **Appendix 31**.

10.8 The third stage of Section 42 consultation was carried out between 12 January and 16 February 2018. Publicity under Section 48 and community consultation under Section 47 in respect of the Proposed Development also took place during this time (as described in more detail in Chapters 11 and 12).

10.9 Each Section 42 consultee was sent a Section 42 consultation pack which comprised the following materials:

10.9.1 Covering letter (shown at **Appendix 32**);

10.9.2 Introduction to Consultation (**Appendix 35**);

10.9.3 s.48/47 combined notice (thereby complying with Regulation 13 of the EIA Regulations 2017) (**Appendix 33**);

10.9.4 Feedback form (**Appendix 34**); and

10.9.1 USB containing the following consultation materials:

- (a) An Introduction to the Consultation (**Appendix 35**);
- (b) PEIR 2018
- (c) Non-Technical Summary PEIR 2018 (**Appendix 39**);
- (d) Masterplan 2018 (**Appendix 36**);
- (e) Noise Mitigation Plan 2018 (**Appendix 41**);
- (f) Statement of Community Consultation 2018 (**Appendix 40**);
- (g) Manston Airport a Regional and National Asset 2018 (**Appendix 37**); and
- (h) Feedback Form 2018 (**Appendix 34**).

10.10 The consultation packs were sent out on the 12 January 2018 and the deadline set by RiverOak for a formal response was 16 February 2018 giving a 35-day consultation period, in excess of the 28 days required.

10.11 Consultees were encouraged to respond by:

10.11.1 completing a hard copy of the Feedback Form and returning it by post or by leaving it at one of the consultation events;

10.11.2 completing the Feedback Form online at www.rsp.co.uk;

10.11.3 or by emailing the response to manstonconsultation@bdb-law.co.uk.

10.12 In total, 1318 responses were received from individuals and organisations.

Section 42 Consultees

10.13 Section 42 of the PA 2008 and Regulation 3 of and Schedule 1 to the Application Regulations set out who RiverOak must consult regarding its proposed application. This includes a prescribed list of bodies, host and neighbouring Local Authorities, and persons with an interest in land affected by the application (PILs).

Prescribed consultees

10.14 RiverOak identified prescribed consultees through consideration of the list in Schedule 1 of the Application Regulations. The list of identified consultees was then compared to the list of prescribed consultees provided by PINS in issuing the Scoping Opinion, to ensure that there were no omissions. A full list of the prescribed consultees to which Section 42 consultation packs were sent can be found at **Appendix 42**.

Local Authorities

- 10.15 Section 43 prescribes which Local Authorities RiverOak must include as Section 42 consultees.
- 10.16 The Proposed Development is proposed within the boundaries of:
- 10.16.1 TDC; and
 - 10.16.2 KCC.
- 10.17 Each of these 'host' authorities were identified as consultees under Section 42(1)(b). In addition, the following neighbouring authorities were identified as Section 42(1)(b) consultees:
- 10.17.1 DDC;
 - 10.17.2 CCC;
 - 10.17.3 East Sussex County Council;
 - 10.17.4 London Borough of Bromley
 - 10.17.5 London Borough of Bexley
 - 10.17.6 Medway Council
 - 10.17.7 Surrey County Council; and
 - 10.17.8 Thurrock Council
- 10.18 For ease of reference, a map showing the geographical extent of the Proposed Development and identifying the boundaries of the relevant Local Authorities (the Location Plan) is provided at **Appendix 13**.
- 10.19 Although not prescribed by Section 43, RiverOak also included a number of Parish Councils in its consultation and these have been detailed and reported on in this Chapter. The following Parish Councils were consulted:
- 10.19.1 Acol Parish Council;
 - 10.19.2 Ash Parish Council;
 - 10.19.3 Birchington Parish Council;
 - 10.19.4 Broadstairs and St Peters Town Council;
 - 10.19.5 Cliffsend Parish Council;
 - 10.19.6 Manston Parish Council;
 - 10.19.7 Margate Charter Trustees;
 - 10.19.8 Minster-in-Thamet Parish Council;
 - 10.19.9 Monkton Parish Council;

- 10.19.10 Preston Parish Council;
- 10.19.11 Ramsgate Town Council;
- 10.19.12 Sandwich Town Council;
- 10.19.13 St Nicholas at Wade with Sarre Parish Council;
- 10.19.14 Westgate-on-Sea Town Council; and
- 10.19.15 Wingham Parish Council.

10.20 In comparison to Stage 2 Consultation, three additional Parish Councils were consulted. This was not due to any change in the consultation boundary but rather in response to a request from Dover District Council in their response to the consultation on the SoCC. The three additional Parish Councils are:

- 10.20.1 Ash Parish Council;
- 10.20.2 Preston Parish Council; and
- 10.20.3 Wingham Parish Council.

Persons with an interest in land (PILs)

- 10.21 Section 44 sets out various categories of persons with an interest in land who should be consulted as Section 42 consultees. In order to establish the identity of PILs, RiverOak instructed WSP to conduct the land referencing exercise.
- 10.22 Details of how the identity of the PILs was established and the land referencing carried out can be found in the WSP Land Referencing Diligent Inquiry Methodology provided at **Appendix 20**.
- 10.23 The Book of Reference (**document reference TR020002/APP/3.3**) sets out which landowners fall into which of the categories in Section 44. In order to comply with data protection principles, RiverOak has not identified individual respondents in this Report, although in accordance with PINS Advice Note 14, the list of Section 42 consultees at **Appendix 42** does identify which of the prescribed consultees are also identified in the Book of Reference.
- 10.24 All 1189 PILS were sent a copy of the Section 42 consultation pack and covering letter, as set out more fully in paragraph 10.9 above.

Other consultation activities

- 10.25 Correspondence and meetings with statutory bodies continued from the Stage 2 Consultation up to, including and beyond Stage 3 Consultation. Details of meetings and correspondence are included in the relevant technical Chapters of the Environmental Statement (**document reference TR020002/APP/5.2**).

Responses

- 10.26 The table below outlines the volume of responses received within the consultation timeframe:

Table 10.1: Volume of Section 42 Consultation responses and how the responses were received

Stakeholder Type	Number of consultees to whom s.42 consultation materials were sent	Number of responses received
Prescribed consultees, excluding Local Authorities, Parish Councils and PILs	90	12
Local Authorities	10	5
Parish Councils	15	4
PILs	1189	31

10.27 Other than any responses which were given their own later deadlines which have all been taken into consideration, no additional s.42 responses were received after the consultation deadline.

Relevant Responses

10.28 A summary of the responses received from the prescribed consultees, Local Authorities, PILs and other organisations of note, together with how RiverOak has taken account of them are summarised in Tables 10.2-10.5 below.

Table 10.2: Prescribed Consultees responses and how RiverOak had regard to the responses

Consultee	Summary of Response	Change? Y / N	Regard had to response
Civil Aviation Authority (CAA)	Additional runway capacity in the south-east of England would benefit passengers and cargo owners.	N	RiverOak notes and agrees with this comment.
	Manston Airport must demonstrate compliance with the agreed international, European and domestic safety criteria, which is regulated by the CAA.	Y	RiverOak agrees with this comment and will, in due course, submit an application to the CAA for the relevant permissions. Further details can be found in the CAA Interface document (document reference TR020002/APP/7.5) .
	Given Heathrow Airport's proposals for a third runway, the airspace design in the south-east of England will require significant change. CAA will make decisions on airspace design changes.	N	RiverOak is aware of and understands that this is the case.
	Manston Airport will require air traffic control operational practices to be implemented.	N	RiverOak is aware of and understands that this is the case.
	Consultation document does not easily distinguish between information which is necessary for consideration by the Secretary of State on the DCO application and information necessary for the CAA to determine whether the separate regulatory requirements are likely to be able to be met.	Y	Clarification on this topic is provide in the CAA Interface Document (document reference TR020002/APP/7.5) .
	The CAA, RiverOak and PINS should jointly determine the approach to be taken by the ExA and	N	This is a matter for the Examining Authority during DCO examination but RiverOak would gladly participate.

	Secretary of State with regard to the materiality of CAA's regulatory functions. Clarity as to whether approach should follow approach adopted by Supreme Court in <i>Morge</i> case (in relation to the function of Natural England as competent authority).		
	Recognition that as a statutory consultee CAA is likely to require information in addition to that required by the ExA/Secretary of State in order to enable it to participate effectively in DCO process, particularly to enable CAA to assure the ExA that operation of Manston Airport is not only a technical possibility but a 'realistic and deliverable operational proposition'.	Y	RiverOak will supply such requested information in its possession.
	CAA cannot consider whether the consultation process meet the requirements of the Airspace Change Process until the ACP is formally commenced.	N	RiverOak is aware of and understands that this is the process.
The Coal Authority	Site is located outside the defined coalfield. On this basis we have no specific comments to make on this consultation.	N	RiverOak notes this comment and thanks the Coal Authority for responding to the consultation.
Defence Infrastructure Organisation	Due to the proximity of the aircraft infrastructure to the MOD mast, it may cause a physical infringement of MOD technical safeguarding criteria. The MoD considers the proposed scheme in its current form and the proposed options for relocating the HRDF to be incompatible with the need to safeguard this technical installation.	Y	Osprey, on behalf of RiverOak, is in ongoing discussions with the MoD about their concerns. A meeting between RiverOak, Bircham Dyson Bell LLP, Osprey, RPS and the MoD was held on 14 March 2018. In this meeting the MoD agreed to provide the relevant technical detail and points of contact to allow the issue to be progressed. They also agreed to consider a draft Heads of Terms, prepared by BDB, for the agreement of placement of the MoD infrastructure.

Environment Agency (EA)	Comments submitted on 18/7/17 remain valid.	N	Noted – these are addressed above in Table 7.2.
	<u>PEIR Chapter 8: Freshwater</u> Hydrogeological Impact Assessment (HIA) dated December 2017 should include aircraft breaking/recycling siting and proposals in the risk assessment tables as a specific item. Location and likely permitting requirements should be indicated.	Y	Aircraft breaking has been included in the risk assessment tables in the Hydrogeological Impact Assessment, Appendix 8.1 to Chapter 8 Freshwater Environment of the ES (document reference TR020002/APP/5.2-7).
	<u>PEIR Chapter 8: Freshwater</u> Given postulated groundwater flow paths, business and cargo units in the N-W of the airport should be indicated as possible high risk areas and clear management of how potential hazardous materials and vehicle handling in these areas will be undertaken is important.	Y	The risk from hazardous materials within the business and cargo units on the Northern Grass has been included in the risk assessment tables in the Hydrogeological Impact Assessment at Appendix 8.1 to Chapter 8 Freshwater EnvironmentE22 of the ES (document reference TR020002/APP/5.2-7).
Forestry Commission	FC not aware of ancient woodland that may be affected. Welcomes decision to ensure consultation and application documentation complies with EIA Regulations 2017.	N	RiverOak notes this comment.
	<u>PEIR Chapter 7: Biodiversity</u> Consideration for how sustainable woodland creation and management of England's woodlands can be secured and use of timber as a construction material is utilised will secure the role that woodlands have in reducing greenhouse gas emissions and carbon sequestration.	N	The Biodiversity assessment (Chapter 7 Biodiversity of the ES (document reference TR020002/APP/5.2-1)) concludes that there are no significant impacts upon woodland and therefore no direct requirement to provide woodland in terms of mitigation. The wildlife affected by the Proposed Development are not woodland species, as the site is principally one of open grassland and hardstanding, and therefore any mitigation (compensation) for wildlife on the Proposed

			Development does not include woodland creation. An airport is also not a suitable site for woodland creation.
	<p><u>PEIR Chapter 7: Biodiversity</u></p> <p>For loss of any woodland the FC asks:</p> <ol style="list-style-type: none"> 1. To explore how this loss could be further reduced and how direct and indirect impacts on ancient woodland can be minimised 2. How best to target creation of new woodland to compensate for loss of trees and woodland 3. That the applicant engages with the FC at the earliest opportunity so our expertise can be used to support the development of options and design of chosen way forwards 	N	No significant adverse impacts on (ancient) woodland or loss of woodland have been identified.
	<p><u>PEIR Chapter 7: Biodiversity</u></p> <p>The Proposed Development must be subject to all necessary and appropriate requirements</p>	N	RiverOak notes this comment.
Health and Safety Executive	<p><u>PEIR Chapter 17: Major Accidents</u></p> <p>According to HSE's records there are no major accident hazard installations with Hazardous Substances Consent.</p>	N	This is understood and forms one of the assumptions of Chapter 17: Major Accidents and Disasters (document reference TR020002/APP/5.2-1).
	<p><u>PEIR Chapter 17: Major Accidents</u></p> <p>HSE unable to verify whether a HZC application will be needed for the fuel farm and potentially for the</p>	N	Based on the current understanding of the chemicals and their quantities, a hazardous substance consent would not apply and COMAH (control of major accident) thresholds would not be reached in aggregate.

	Cargo facilities 1-4. Proximity of housing may have an impact.		
	<u>PEIR Chapter 17: Major Accidents</u> Presence of hazardous substances above set threshold quantities may require HSC (hazardous substances consent).	N	Based on current understanding of the anticipated chemicals and their quantities, a hazardous substance consent would not apply and COMAH thresholds would not be reached in aggregate.
Highways England	Note that initial trip generation information indicates that approximately 800 peak hour vehicles could be generated by Proposed Development during peak operation (2039). Initial distribution proportions do not extent to M2/A2 corridor and HE considers that it is not unreasonable to assume that proportion of peak hour generated trips will use M2/A2 corridor. HE requests further information to enable HE to provide a substantive response on the likely trip generation effects on HE's strategic road network.	Y	This has been provided within Chapter 8 of the Transport Assessment (document reference TR020002/APP/5.2-15). This Chapter sets out the wider traffic and transport impacts on the Highways England network with a wider scope than initially presented in the previous 2018 PEIR. The scope of this was agreed with Highways England.
	Transport Assessment should evaluate both the strategic road network and local road network and provide a volume of peak hour trips being generated on the strategic road network by junction/location. Peak hour trip data to be shared with HE.	Y	The Transport Assessment (document reference TR020002/APP/5.2-15) provides both the strategic and local network assessments as requested by Highways England and KCC. At this stage this assessment does not indicate the need for improvements to the Highways England network, but does indicate the need for some junction and link improvements on the KCC network. Further details can be found within the Transport Assessment.
Historic England	<u>PEIR Chapter 9: Historic Environment</u> Advice in letter of 21/7/17 remains valid. The PEIR is deficient in a number of ways and further	Y	RiverOak notes this comment and has held further meetings with Historic England to address its concerns.

	assessment work is required in order to produce an ES.		
	<p><u>PEIR Chapter 9: Historic Environment</u></p> <p>PEIR historic environment information derived from desk based studies and a limited walk over survey. Desk Based Assessment (DBA) relies on information gathered by SHP and limited observation of trial trenches under excavation at time of walk over survey. Results of field evaluations by SHP not in public domain which would usefully inform the design of the Proposed Development. HE have serious concerns that there will be some aspects of the application that cannot be properly assessed because its impacts on heritage significance would be different in some key respects. Northern grassland has not been subject of any archaeological site evaluation. DBA and PEIR hardly mention it.</p>	Y	<p>Unsuccessful efforts have been made thus far to acquire the SHP reports. Further investigation, to include the Northern Grass area is proposed (Sections 9.8-9.9 of Chapter 9 of the ES (document reference TR020002/APP/5.2-1), the scope of which will be discussed with KCC, TDC and Historic England. For this reason, the assessment presented in this ES provides a 'worst-case' scenario.</p> <p>Discussion of the Northern Grass area has been expanded at Section 9.4.43 to consider potential effects in more detail.</p> <p>For further details about the approach to the environmental impact assessment including details on approach to further surveys, please refer to Chapter 5 of the ES (document reference TR020002/APP/5.2-1).</p>
	<p><u>PEIR Chapter 9: Historic Environment</u></p> <p>21 July letter misrepresented in the PEIR where it says "HE have confirmed in their consultation response to the 2017 consultation that they are satisfied archaeological works could be secured by requirements on any DCO." Scheme of post-determination archaeological work proposed.</p>	Y	<p>Further consultation with Historic England (Chapter 9: Historic Environment, Table 9.4 of the ES (document reference TR020002/APP/)) has confirmed a misinterpretation of an ambiguous comment, which has been amended and taken account of in the ES.</p>
	<p><u>PEIR Chapter 9: Historic Environment</u></p>	Y	<p>Unsuccessful efforts have been made thus far to gain further access to the site for further archaeological surveys. Further investigation is</p>

	<p>Remains HE's view that archaeological potential is not well enough understood at present to effectively avoid harm through design, or that it has been shown that there is sufficient flexibility to redesign the scheme to avoid harm if significant archaeological remains are discovered. Further assessment including intrusive investigations is appropriate prior to a DCO application being made.</p>		<p>proposed (Chapter 9: Historic Environment Sections 9.8-9.9 of the ES (document reference TR020002/APP/5.2-1), the scope of which will be discussed with KCC, TDC and Historic England.</p> <p>Contingency planning for avoidance of archaeological remains by design can only be discussed in principle at this stage and is reflected by the flexibility inherent in outline masterplanning. For this reason, the assessment presented in Chapter 9 of the ES provides a 'worst-case' scenario.</p>
	<p><u>PEIR Chapter 9: Historic Environment</u></p> <p>Concern is that if something of significance is confirmed post-determination of a DCO application that it may not be possible to achieve preservation in situ.</p>	<p>N</p>	<p>Please see response to comment above.</p>
	<p><u>PEIR Chapter 9: Historic Environment</u></p> <p>If the SoS is minded to issue a DCO he might allow the necessary assessment to be undertaken after its issue. In this case the assessment should take a worst case scenario approach so as to make provision for adequately mitigating the effects of the development on the environment. The PEIR does not appear to have done this. For e.g. table 9.14 both the magnitude of change and the heritage significance criteria relate to best-case scenarios even though it is not clear that the magnitude of change will be low.</p>	<p>Y</p>	<p>The assessment presented Chapter 9 Historic Environment of the ES (document reference TR020002/APP/5.2-1) provides a 'worst-case' scenario (refer to Chapter 5: Approach to the ES, paragraph's 5.4.15-5.4.20).</p>

	<p><u>PEIR Chapter 9: Historic Environment</u></p> <p>Historic England think it reasonable to expect the ES to include more detailed contingency planning than is proposed in the PEIR including extent of the Proposed Development. Such provision is likely to have implications for the masterplan and quantum of development.</p>	Y	Contingency planning for avoidance of archaeological remains by design can only be discussed in principle at this stage and is reflected by the flexibility inherent in outline masterplanning.
	<p><u>PEIR Chapter 9: Historic Environment</u></p> <p>It is mentioned that further investigation and assessment of historic structures to ascertain their current condition, desirability and feasibility for incorporation in the final design will be assessed further in the ES. We agree that the ES should include more detailed desktop assessment and site survey in order to enhance the overview of historic buildings.</p>	Y	Due to site access constraints as explained above and in Chapter 5 of the ES (document reference TR020002/APP/5.2-1), the assessment presented Chapter 9 Historic Environment of the ES (document reference TR020002/APP/5.2-1) provides a ‘worst-case’ scenario.
	<p><u>PEIR Chapter 9: Historic Environment</u></p> <p>Heritage significance of the northern grassland should also be assessed for the ES. We consider the area likely to have some heritage significance that arises from the potential to appreciate its wartime use as well as that arising from any buried archaeological remains that it may contain.</p>	Y	Discussion of the Northern Grass area has been expanded at Chapter 9: Historic Environment, paragraph 9.4.43 of the ES (document reference TR020002/APP/5.2-1) to consider potential effects in more detail.
	<p><u>PEIR Chapter 9: Historic Environment</u></p> <p>The option to preserve important buildings or structures should be allowed for in the master plan. If there is doubt as to whether any of the historic</p>	Y	As explained in Chapter 9 of the ES (document reference TR020002/APP/5.2-1) further survey work is proposed to ascertain the condition and potential for sustainable reuse (Sections 9.8-9.9) the scope of which will be discussed with KCC, TDC and Highways England.

	<p>structures have a sufficient level of special interest to possibly justify their listing then some of our Enhanced Advisory Services would be an appropriate way of obtaining greater clarity and managing the risk of a third party making listing requests during consideration of the DCO application.</p>		<p>For this reason, the assessment presented in this ES (document reference TR020002/APP/5.2) provides a 'worst-case' scenario (refer to Chapter 5 Approach to the ES).</p> <p>The option to utilise Enhanced Advisory Services is noted and will be considered as appropriate.</p>
	<p><u>PEIR Chapter 9: Historic Environment</u></p> <p>We acknowledge that reuse of the airfield for aviation purposes reflects the recent historic use of the site and is not harmful per se, however, we don't think that the heritage significance of historic buildings would be enhanced by an active airport use if the new use destroyed or obscured important characteristics of their settings.</p>	Y	<p>Further investigation is proposed (Chapter 9 Historic Environment, Sections 9.8-9.9 of the ES (document reference TR020002/APP/5.2-1)) to fully ascertain the potential for sustainable reuse, and will include further consideration of setting,</p> <p>Desk based assessment of the heritage setting of these built heritage assets is provided at Section 9.4 of Chapter 9 of the ES and concludes that substantial changes to the airfield over time, including the bisection by the Manston Road, has already had an impact on heritage setting.</p>
	<p><u>PEIR Chapter 9: Historic Environment</u></p> <p>We think it problematic that the DBA doesn't provide more detailed assessments of how the heritage significance of those heritage assets identified as vulnerable might be affected by development in their settings: Table 5.1 only seems to provide the conclusions of assessment. We think that a more detailed assessment of the significance of effect would be appropriate</p>	Y	<p>Chapter 9: Historic Environment of the ES (document reference TR020002/APP/5.2-1) has been amended to include further detailed assessment of the significance of all heritage assets, specifically at Appendix 9.5 (document reference TR020002/APP/5.2-10). Further discussion of the setting of non-designated built heritage assets on the site is provided at Section 9.4 of Chapter 9 and in Appendix 9.1 (document reference TR020002/5.2-8 and 5.2-9) and concludes that substantial changes to the airfield over time, including the bisection by the Manston Road, has had an impact on the heritage setting of these assets. This assessment will be further enhanced by further surveys proposed (see Sections 9.8-9.9 of Chapter 9).</p>

	<p><u>PEIR Chapter 9: Historic Environment</u></p> <p>The ES should explain the approach to the use of visualisations for heritage assets and accurate visual representations of the levels of possible harm should be prepared where appropriate.</p>	Y	<p>Discussion has been added within Chapter 9 Historic Environment of the ES (document reference TR020002/APP/5.2-1), specifically at Section 9.6.19.</p>
	<p><u>PEIR Chapter 9: Historic Environment</u></p> <p>We think that the ES should include a clearer assessment of the effects on Richborough Fort. Table 5.1 also seems to confuse aesthetic value with Historic Value (which it doesn't refer to at all) and uses the term "group value", which is not explained. The ES should clarify and expand Table 5.1.</p>	Y	<p>Chapter 9: Historic Environment of the ES (document reference TR020002/APP/5.2-1), specifically Table 9.15 has been amended to present a clearer assessment of the effects on Richborough Fort.</p>
	<p><u>PEIR Chapter 9: Historic Environment and Noise</u></p> <p>If any heritage assets are shown to be within the 60dB noise contour and sensitive to increased noise it would be appropriate to undertake surveys at each such asset. The PEIR does not demonstrate very clearly that the 3-stage approach advocated by the ANM report was followed.</p>	Y	<p>The methodology for assessment of noise on heritage assets has been revised in Chapter 9 Historic Environment of the ES (document reference TR020002/APP/5.2-1), within Section 9.7 and Appendix 9.1 (document reference TR020002/APP/5.2-8 and 5.2-9) to apply a staged assessment methodology in accordance with the ANM report. Assets identified as sensitive to increased noise are included at Section 9.11 and are considered further as part of the mitigation measures outlined at Chapter 12: Noise and Vibration (document reference TR020002/APP/5.2-2).</p>
	<p><u>PEIR Chapter 9: Historic Environment</u></p> <p>Environmental noise assessment techniques are imprecise (ANPS, p.14-16) and therefore we recommend that where important heritage assets fall just outside of assessment thresholds it would be appropriate to err on the side of caution and assess</p>	Y	<p>The methodology for assessment of noise on heritage assets has been revised in Chapter 9 of the ES (document reference TR020002/APP/5.2-1), Section 9.7 and the desk based assessment at Appendix 9.1 (document reference TR020002/5.2-8 and 5.2-9). Within the desk based assessment a staged assessment of the effect of noise on all heritage assets is presented at Appendix E.</p>

	<p>them. The assessment for Minster Abbey refers to it being outside the 60dB noise contour but “at the very edge of the maximum average contour”, which we didn’t understand and therefore think needs some explanation.</p>		
	<p><u>PEIR Chapter 9: Historic Environment</u></p> <p>We note that little assessment of the settings of undesignated assets has been undertaken, which we think is an omission that should be rectified in the ES, including application of the staged noise assessment methodology, as the ANM report recommends.</p>	Y	<p>Assessment of the settings of undesignated assets on the site has been expanded upon in Chapter 9 of the ES (document reference TR020002/APP/5.2-1), Section 9.4. The methodology for assessment of noise on heritage assets has been revised in Section 9.7 and Appendix 9.1 (document reference TR020002/APP/5.2-8 and 5.2-9) to apply a staged assessment methodology in accordance with the ANM report.</p>
	<p>We think that you should clarify in the ES whether the 60dB contour proposed is an average mode contour or a single mode contour, and if it is the former it might be appropriate to undertake some further assessment.</p>	Y	<p>The methodology for assessment of noise on heritage assets has been revised in the ES (document reference TR020002/APP/5.2-1), section 9.7 and Appendix 9.1 (document reference TR020002/APP/5.2-8 and 5.2-9) which now uses both average and modal contours for the assessment of all heritage assets. Modal contours present a worst-case scenario and were used to inform the assessment presented at Section 9.10.</p>
	<p><u>PEIR Chapter 9: Historic Environment</u></p> <p>We agree with the KCC Heritage Team’s comment that the significance assessment matrix (PEIR Vol.1, p. 9-14) downplays medium level effects on highly significant assets by assessing them as “not significant”. We also think it odd that although the results of historic map regression were recorded in the DBA in Table 4.5, none of the maps were</p>	Y	<p>The 2018 PEIR adopted a best-case approach whereby effects were assessed as not significant subject to appropriate mitigation. The assessment presented in Chapter 9 Historic Environment of the ES (document reference TR020002/APP/5.2-1), specifically Section 9.11 has been amended to present a worst-case scenario (see Chapter 5: Approach to the ES, paragraphs 5.4.15-5.4.20).</p> <p>The maps used for the historic map regression are now included in Appendix 9.1 at Appendix D. The maps to illustrate the DBA are now</p>

	reproduced in the report. Furthermore, the maps that were meant to illustrate the DBA are not reproduced in the pdf document that we have received; their pages are titled but are otherwise blank.		included at Appendix A (document reference TR020002/APP/5.2-8 and 5.2-9) .
Natural England	Seeks clarification regarding the statement in Chapter 3 of the PEIR that a new discharge consent 'may' be required from the EA. NE's position is that it considers that a new discharge consent would be required if RiverOak intends to continue to make use of the Pegwell Bay outfall.	N	An appropriate strategy to the regulation of the quality of the site discharge to Pegwell Bay will be discussed and agreed with the EA and Natural England as a part of the detailed site drainage design. Initial discussion with the EA indicate that the resumption of the use of the discharge pipe to Pegwell Bay may not require a new discharge consent as the majority of the discharge will be surface water runoff, but will be sought if required by the EA.
	Concern regarding errors in Chapter 4 of PEIR regarding number of European sites within vicinity of the Proposed Development.	Y	RiverOak confirms that Natural England's observations are correct. Chapter 4 of the 2018 contained a discrepancy and was inconsistent with Chapter 7 which correctly identified the number of Natura 2000 sites. Chapter 4 of the ES has been corrected (document reference TR020002/APP/5.2-1).
	Concern that no discussion with Natural England concerning discussions regarding operational air quality impacts on Ramsar sites and SAC habitat.	Y	This was discussed in a phone meeting with Natural England on 6 March 2018. The rationale for the choice of receptors was explained, and in particular it was explained that the receptors represent locations of greatest exposure to air quality impacts within each designated site, and have been assessed as though there are features of interest present at that location, which is a conservative approach. After this further explanation from Wood, Natural England indicated they were content with the modelling approach and conclusions.
	Concern that no reference in relation to assessments of air quality on ecological receptors to comparisons between the peak previous airport use and current proposals.	N	No information on impacts of previous airport use is available. RiverOak's modelling suggests that any such air quality impacts would have been small and not possible to observe in practice.

	<p>Concern that choice of non-human receptors regarding air quality will not always pick up the most sensitive habitats. NE has not agreed the selection of non-human air quality receptors.</p>	Y	<p>This was discussed in a phone meeting with Natural England on 6 March 2018. After this further explanation from Wood, Natural England indicated they were content with the modelling approach and conclusions.</p> <p>Receptors were chosen to identify the locations with the greatest concentrations of pollutants (i.e. the locations closest to the airport or roads). The assessment then assumed that the most sensitive features for each site applied across the whole site, including at the modelled receptors. This approach was taken as a first pass because the air quality team is not qualified to identify particular locations within the designated site where the most sensitive features are present. This approach is a worst case scenario. Further details can be found in Chapter 6 of the ES (document reference TR020002/APP/5.2-1).</p>
	<p>Concern that Air Quality Chapter of PEIR does not assess the potential in-combination effects of aircraft emissions and road traffic on relevant designated sites.</p>	N	<p>The potential in-combination effects of aircraft emissions and road traffic on relevant designated sites has been adequately assessed within Chapter 6: Air Quality of the ES (document reference TR020002/APP/5.2-1).</p>
	<p>Concern that surveys regarding bat data still incomplete and that NE will not engage with RiverOak regarding a derogation licence until all survey work is complete.</p>	Y	<p>At the meeting on 6 March 2018 between RiverOak's consultants and NE, NE agreed to liaise with its licensing team on this issue.</p>
	<p>NE do not agree that 80dB LAMax is an appropriate minimum threshold below which birds will not be disturbed. NE prefer 55dB LAMax threshold. Further concern that Chapter does not consider level of noise disturbance affecting the SPA when airport previously operational.</p>	N	<p>Lower decibel levels are considered in the ES. The 55dB LAMax contour would not be appropriate as it would cover much of the region.</p>

	<p>Concern regarding RSP's position in relation to a discharge permit for discharges into Pegwell Bay. NE appear to disagree that RiverOak can rely on point that as 'surface water' concerned, no discharge permit required.</p>	<p>Y</p>	<p>RiverOak will continue discussions with the EA and seek any permits for discharge that they require</p>
	<p>Comment on figures 6.5 and 6.6 in PEIR Chapter 6 – Air Quality – would be helpful if ES could provide more detailed figures which overlay receptor locations with boundaries of ecological sites and features.</p>	<p>Y</p>	<p>This information is provided within figures associated with Chapter 7: Biodiversity of the ES (document reference TR020002/APP/5.2-1).</p>
	<p>Comment on 6.4.14 of Chapter 6 of the PEIR. Query whether applicant has considered possibility that there may be more sensitive habitats further within particular sites which may suffer more significant impact even though emission or deposition levels are reduced by this point.</p>	<p>Y</p>	<p>This was discussed in a phone meeting with Natural England on 6 March 2018. After this further explanation from Wood, Natural England indicated they were content with the modelling approach and conclusions.</p> <p>Receptors were chosen to identify the locations with the greatest concentrations of pollutants (i.e. the locations closest to the airport or roads). The assessment then assumed that the most sensitive features for each site applied across the whole site, including at the modelled receptors. This approach was taken as a first pass because the air quality team is not qualified to identify particular locations within the designated site where the most sensitive features are present. This approach is a worst case scenario. Further details can be found in Chapter 6 of the ES (document reference TR020002/APP/5.2-1).</p>
	<p>Comment on 6.5.24 of Chapter 6 of the PEIR – seeking confirmation that use of background deposition rates from APIS website based on most sensitive habitat feature at that site picks up above comment on 6.4.14.</p>	<p>Y</p>	<p>Please refer to comment immediately above.</p>

	Comment on Table 6.8 of Chapter 6 of the PEIR – NE wish to discuss derivation of NOx target for protected conservation areas.	Y	This is now set out in Chapter 6 of the Environmental Statement (Document reference TR020002/APP/5.2-1)
	Clarification sought that reference in 6.8.26 of Chapter 6 of the PEIR that results are only given for a ‘selection of receptors’ is to be interpreted as meaning all incidences of significant impact on major ecological receptors have been listed.	N	The selection consists of those receptors where the significance is greatest.
	NE wishes to discuss effects of construction and operation on Proposed Development on designated sites sensitive to changes in air quality.	Y	RiverOak confirms that it will engage with Natural England on this and all issues relating to Pegwell Bay at detailed design stage
	Query that content of Table 7.11 in Chapter 7 of PEIR (Biodiversity) does not match Table 6.29 despite having identical titles.	Y	RiverOak confirms that this has been adequately addressed in Chapter 7 of the ES (document reference TR020002/APP/5.2-1).
	NE content to work with applicant on nutrient nitrogen deposition at receptor E22 (Pegwell Bay) to ascertain whether this would result in an adverse effect on site integrity.	Y	RiverOak confirms that it will engage with Natural England on this and all issues relating to Pegwell Bay at detailed design stage
	NE seeks further discussion with applicant on air quality monitoring data to assess potential in-combination effects.	Y	An assessment of in-combination effects is included in Chapter 7 of the ES (document reference TR020002/APP/5.2-1).
	NE comment that not appropriate to assess air quality impacts as ‘not significant’ when further assessments acknowledged to be required.	Y	RiverOak confirms that this has been adequately addressed in Chapter 7 of the ES (document reference TR020002/APP/5.2-1).

	Comment that ES Chapter 7 (Biodiversity) should make explicit reference to NE Standing Advice for protected species in the list of relevant guidance.	Y	Explicit reference to the NE (Defra) standing advice for protected species has been made within Section 7.2, Chapter 7 Biodiversity of the ES (document reference TR020002/APP/5.2-1) .
	Queries regarding references to impact pathway of bird disturbance at 7.9 and 7.10 of Chapter 7 of the PEIR and bird disturbance impacts on Sandwich Bay to Hacklinge Marshes.	Y	RiverOak confirms that this has been adequately addressed in Chapter 7 of the ES (document reference TR020002/APP/5.2-1) .
	Query why consultation with Kent Downs AONB Unit proposed.	N	Consultation with the Kent AONB unit was requested in the response to the Scoping Report.
	NE does not agree that noise levels below 80dB LAMax are unlikely to cause disturbance to birds and this is a 'key unresolved issue' for NE.	Y	The minimum threshold has now been reduced to 70 dB LAMax, which RiverOak considers appropriate, for the assessment of the more sensitive bird species, such as golden plover. This was to be a key point of discussion with Natural England at the most recent phone meeting held on 6 March 2018, although could not be progressed as their ornithologist was unwell and could not attend. A follow up meeting with the ornithologist is planned although a date has not yet been set.
	Query that use of 'European sites within 200m of construction site' in context of Table 5.1 of HRA is not a relevant geographic parameter for aircraft.	Y	Table 5.1 (now 3.1 in the final HRA – Appendix 7.1 to the ES, document reference TR020002/APP/5.2-6) now also includes a geographic parameter for wider AQ effects.
	NE does not accept that a conclusion of no likely significant effects on Turnstone and Thanet Coast and Sandwich Bay Ramsar in relation to construction phase of outfall works can be reached in advance of CEMP being produced and reviewed by NE.	Y	This is addressed in Chapter 7 Biodiversity of the ES (document reference TR020002/APP/5.2-1) and the CEMP, Appendix 3.2 of the ES (document reference TR020002/APP/5.2-6) .

	Potential for likely significant effects on national rare wetland invertebrates during operation phase will require further modelling and discussion with NE.	Y	This has been addressed in Chapter 7 Biodiversity of the ES (document reference TR020002/APP/5.2-1) and additionally within the Report to inform Appropriate Assessment (Appendix 7.1 of the ES (document reference TR020002/APP/5.2-6)).
	NE does not accept that a conclusion of no likely significant effects on Golden plover and Thanet Coast and Sandwich Bay Ramsar in relation to construction phase of outfall works can be reached in advance of CEMP being produced and reviewed by NE.	Y	This is addressed in Chapter 7 Biodiversity of the ES (document reference TR020002/APP/5.2-1) and the CEMP, Appendix 3.2 of the ES (document reference TR020002/APP/5.2-6).
	Potential for likely significant effects on Sandwich Bay SAC yet to be determined and will require further modelling and consultation with NE.	Y	Assessment of effects of air quality on the Sandwich Bay Special Area of Conservation and its invertebrates is now complete, and included in Chapter 7 Biodiversity of the ES (document reference TR020002/APP/5.2-1) and Appendix 7.1 (document reference TR020002/APP/5.2-6).
	In respect of likely effects on Thanet Coast and Sandwich Bay SPA (Golden plover non-breeding) NE does not agree that noise levels below 80dB LAMax are unlikely to cause disturbance to birds and would like to see figures 6.1a and 6.1b in 6.2.5.6 and 6.2.5.7 of HRA modelling noise contours down to a much more level.	N	This is addressed in Chapter 7 Biodiversity of the ES (document reference TR020002/APP/5.2-1) and Appendix 7.1 (document reference TR020002/APP/5.2-6).
	NE not in a position to agree with applicant's view of no likely significant effects on Thanet Coast and Sandwich Bay SPA through pathways of noise and visual disturbance and bird scaring.	N	This is addressed in Chapter 7 Biodiversity of the ES (document reference TR020002/APP/5.2-1) and Appendix 7.1 (document reference TR020002/APP/5.2-6).

		Comment on <i>Technical note: Bid disturbance by aircraft – a literature review</i> . NE does not accept that 80dB LAMax is a minimum threshold for noise disturbance.	Y	This Technical Notes has been updated with minimum threshold reduced to 70 dB LAMax for the assessment of the more sensitive bird species, such as golden plover. Agreed at NE consultation on 06.03.18 to issue updated Tech' Note to NE pre-application.
Public Health England		This response should be read in conjunction with previous responses to consultation: - scoping opinion – July 2016 - statutory consultation – June 2017	N	RiverOak notes this response.
		Generally satisfied with approach taken – in line with current guidance and good practice	N	RiverOak notes and welcomes this response.
		EIA indicates that the implementation of the Proposed Development will result in significant adverse impacts on local sensitive receptors, notably on air quality, noise and odour. Strongly recommend that the applicant considers all opportunities to mitigate against any significant deterioration in environmental quality.	Y	The air quality effects resulting from the Proposed Development have been assessed in Chapter 6: Air Quality of the ES (document reference TR020002/APP/5.2-1). The assessment shows that air quality will remain comfortably within legal limits. These legal limits are themselves based on World Health Organization guidance on health effects, allowing for the most vulnerable members of society. The air quality impacts of the airport are small and confined to the vicinity of the airfield and certain major roads. The impact of air quality on wildlife, ecosystems and biodiversity is assessed in Chapter 7: Biodiversity of the ES (document reference TR020002/APP/5.2-1) and is shown to be not significant. Mitigation measures are considered in section 6.6 of Chapter 6 and in Table 6.26 of Appendix 6.4 (document reference TR020002/APP/5.2-1) . The potential noise effects resulting from the Proposed Development have been assessed in Chapter 12: Noise of the ES (document reference TR020002/APP/5.2-1). A summary of the significant residual effects is provided at Section 12.10. Based on this assessment, RiverOak has developed a Noise Mitigation Plan to reduce noise effects (document

			<p>reference TR020002/APP/2.4). The impact of noise on wildlife, ecosystems and biodiversity is assessed in Chapter 7: Biodiversity of the ES (document reference TR020002/APP/5.2-1).</p> <p>The impact of odour from the airport has been assessed in Appendix 6.4 to Chapter 6: Air Quality in the ES (document reference TR020002/APP/5.2-1).</p>
	Welcome the inclusion of a new Chapter on health and wellbeing (Chapter 15) as well as the Health Impact Assessment.	N	RiverOak notes and welcomes this response.
	<p>Note that many of the environmental Chapters have missing information or incomplete assessments including, but not limited to:</p> <ul style="list-style-type: none"> - Chapter 6: Air Quality - appendix 6.4: Odour - Chapter 15: Health and Wellbeing - Chapter 17: Major Accidents and Disasters 	Y	The assessments in the ES are complete.

	<p>Reiterate the importance of the CEMP for the control of many of the construction issues. The mitigation for many of the effects are said to be controlled through the CEMP but as this was not included as a consultation document it is hard to comment on its scope, adequacy and content.</p> <p>Strongly suggest that the draft CEMP is circulated to interested parties ahead of the DCO application submission.</p>	Y	<p>A CEMP, Appendix 3.2 of the ES (document reference TR020002/APP/5.2-6) is included within the DCO submission and lists all appropriate mitigation to reduce or avoid adverse effects during construction.</p> <p>The CEMP has been issued for comment ahead of application submission to both DDC and Public Health England.</p>
Royal Mail Group Limited	<p>Royal Mail has operational facilities in Ramsgate, Broadstairs, Margate, Sandwich and Canterbury. Concerned that its future ability to provide an efficient mail sorting and delivery service may be adversely affected by construction and operation of Manston Airport.</p>	Y	<p>Construction works will be programmed and managed to allow the continued use of all local roads during the construction period. Where short closures are required for works, diversions are proposed. When construction work is being scheduled Royal Mail will be a key stakeholder and comments will be sought. Further details can be found in the Transport Assessment (document reference TR020002/APP/5.2-15).</p> <p>When construction is complete the enhancements provided by the Proposed Development could assist with the conveyance of Royal Mail loads and the airport its self might serve as location for the routing to and from of Royal Mail Air Freight.</p>
	<p>PEIR Chapter 14 (Traffic and Transport) does not appear to formally acknowledge need to ensure that major road users such as Royal Mail are not disrupted through advance consultation by RiverOak at the appropriate time in the development process.</p>	Y	<p>As construction contractors are unknown at this stage and the phasing and development of the offsite and onsite highways works are unknown, it is too early in the process to engage with Royal Mail on impacts that the construction of the Proposed Development may have on Royal Mail vehicles. However Royal Mail will be involved as a key stakeholder at the appropriate time in the Proposed Development's lifecycle.</p>

	Requests that DCO application includes a Requirement that Royal Mail is pre-consulted by RiverOak on any proposed road closures, diversions, alternative access arrangements, hours of working and the content of the final CTMP.		RiverOak agrees to consult the Royal Mail on the CTMP (Requirement 14 of the draft DCO (document reference TR020002/APP/2.1)).
	Requests that the DCO application includes a requirement that the final CTMP includes provision for a mechanism to inform major road users about works affecting the local network (with particular regard to Royal Mail's distribution facilities in the vicinity of the site)		RiverOak agrees to consult the Royal Mail on the CTMP (Requirement 14 of the draft DCO (document reference TR020002/APP/2.1)).
	Request that DCO application assesses the potential for cumulative effects regarding the impact on traffic during the construction and operation phases of the development.	N	Due regard to cumulative effects is given in Chapter 18 of the ES (document reference TR020002/APP/5.2-3) .
Southern Gas Networks	There may be Southern Gas Networks gas infrastructure under the Proposed Development site.	Y	RiverOak agrees that it will liaise with Southern Gas Networks in relation to this.

Table 10.3: Local Authority responses and how RiverOak had regard to the responses

Local Authority	Summary of Response	Change? Y / N	Regard had to response
Canterbury City Council (CCC)	CCC originally claimed it has not been consulted by RiverOak in accordance with PA 2008 requirements. However, it confirmed that it was able to respond on 16 February 2018 and did so.	Y	The consultation pack had been sent to the Council's offices and apparently had not been received, although every member of the council was also sent a pack. Despite the council responding by the deadline and saying it was able to respond, it was subsequently sent a further

			<p>consultation pack and was given additional time to respond. The council responded on 28 March 2018 confirming it had no record of receiving consultation documents in January but acknowledged it had responded to the consultation within the required timescale.</p> <p>It also acknowledged that it had subsequently received the consultation pack and confirmed it had been informed by RiverOak that postcards were sent to residents in Herne Bay as set out in the SoCC. The council also confirmed it had received a copy of the postcard and a delivery location map.</p>
	<p>Concern regarding adequacy of consultation, in particular whether consultation has been carried out in accordance with RSP's Statement of Community Consultation (SoCC). City Council should be consulted as a 'neighbouring authority' under PA 2008. Residents of Herne Bay should be consulted in a full and meaningful way at all stages of the DCO process.</p>	Y	<p>All residents of Herne Bay were leafleted for the Stage 3 Consultation (with the distribution areas at Appendix 51). RiverOak issued a press release attesting to this fact at the request of CCC.</p>
	<p>Request for comprehensive assessment and full mitigation of noise and disturbance to residents in Herne Bay, particularly in relation to night flights and type of aircraft likely to use the airport.</p>	Y	<p>A comprehensive assessment of noise on people has been presented in Chapter 12 of the ES (document reference TR020002/APP/5.2-2). Here the significant adverse effects of noise are set out.</p> <p>A noise mitigation plan has been developed by the promoter (Document reference TR020002/APP/2.4) which will avoid significant adverse effects of noise and minimise the adverse effects of noise. The noise mitigation plan includes the following measures:</p> <ul style="list-style-type: none"> • A restriction on night-time aircraft: • A restriction on the noisiest aircraft operating at night: • An Annual Quota Count (QC) budget of 3,028 for the night-time (23:00-07:00): • A restriction on training flights:

			<ul style="list-style-type: none"> • The establishment of a Community Consultative Committee. The committee will have an independent chair and secretary who will be paid from airport funds. It will meet quarterly in public at suitable premises on the airport and its agendas and minutes will be published. It will also have the power to create special purpose sub-committees as appropriate. • A community Trust Fund: • Noise and track monitoring: • Departure Noise Limits: • Financial penalties for aircraft operators exceeding noise limits or flying off-track during the day and night; • A low power/low drag procedure; subject to Air Traffic Control (ATC) speed control requirements and the maintenance of safe operation of the aircraft; • Procedures to minimise reverse thrust and • Restrictions on engine testing
	Request for robust monitoring regime for night flights and imposition of sanctions for any breach in night flight restrictions or agreed noise parameters.	Y	The Noise Mitigation Plan (document reference TR020002/APP/2.4) includes a noise monitoring regime as well as financial penalties for operators whose aircraft exceed the noise limits set out in the plan.
Dover District Council (DDC)	DDC welcomes and offers its full support to RiverOak's proposal and recognises the positive contribution it would make to the regeneration of the East Kent economy, as well as the UK's aviation economy. ... Maximises the potential of east Kent's location as a gateway to continental Europe and its fast links to London, as well as its status as a significant economic sub-region is essential in providing a	N	RiverOak notes and welcome this response.

	<p>strong platform for growth and responding effectively to the implications of a post-Brexit environment.</p> <p>...</p> <p>Additionally, the forecast generation of 2,655 jobs and 30,000 jobs by year 2 and 20 respectively and the provision of a dedicated training and educational facility supports the identification of the Manston Airport site as a key employment site in the County Council's Kent and Medway Growth and Infrastructure Framework (September 2015) and will positively contribute toward supporting innovation, productivity and skills within the wider east Kent sub-region.</p>		
	<p>Requests a Planning Performance Agreement (PPA) (as was done for Richborough)</p>	<p>Y</p>	<p>An agreement is being negotiated with DDC.</p>
	<p><u>Review of Future Housing and Employment Growth and Capacity for Development</u></p> <p>Para 2.13 states "RPS considers that both approaches do not reflect the correct Housing Market Area, including the three LPAs in East Kent ... Shepway and Ashford..."</p> <p>The DC commissioned Peter Brett Associates to undertake a Strategic Housing Market Assessment which was published in February 2017. Based on a robust and PPG compliant methodology that considered links between the identified HMA and its neighbours, DDC's SHMA (2017) concluded</p>	<p>N</p>	<p>Both DDC and TDC are in the earliest stages of preparing their housing strategies which will inform their new Local Plans. The NPPF advises that there should be collaboration between neighbouring authorities to agree on exactly this sort of issue. Ultimately, it will be for a Local Plan Inspector to decide whether the right approach has been taken as part of the Local Plan Examinations.</p>

	<p>that Dover is better placed with Shepway. Such findings were approved at a Cabinet meeting dated 1 March 2017.</p>		
	<p><u>Outline Business Case</u> DDC welcomes this and sets out that the Applicant will need to provide a Statement of Reasons and a Funding Statement as part of the application.</p>	Y	<p>Both of these documents form part of RiverOak's application submission:</p> <ul style="list-style-type: none"> - Statement of Reasons (document reference TR020002/APP/3.1) - Funding Statement (document reference TR020002/APP/3.2)
	<p><u>PEIR ch.11 – LVIA</u> DDC concurs with the proposed landscape sensitivity assessment for Landscape Character Areas within DDC's administrative area, as set out in paragraphs 11.11.1 to 11.11.5.</p>	N	<p>RiverOak notes and welcome this response.</p>
	<p><u>PEIR ch.11 – LVIA</u> DDC wishes to further engage with the Applicant on the proposal set out at paragraph 11.3.6 (new Air Traffic Control facility) and alternatives, as greater detail emerges.</p>	Y	<p>RiverOak notes this comment and confirms that it will engage with DDC on this matter.</p>
	<p><u>PEIR ch.12 – Noise</u> DDC welcomes the Noise Mitigation Plan and seeks to work proactively with the Applicant to ensure the provision of necessary mitigation measures.</p>	N	<p>RiverOak notes and welcome this response.</p>
	<p><u>PEIR ch.12 – Noise</u> Question the exclusion of West Stourmouth from the baseline monitoring data, when DDC had</p>	N	<p>The baseline at Stourmouth was assessed and described in Chapter 12 (OBS location 6 in Table 12.3) of the 2018 PEIR. Short-term noise</p>

	<p>previously advised that adverse noise effects have been identified here to the point where there would be a perceived change in quality of life.</p> <p>Paragraphs 12.9.67 and 12.9.69 identify West Stourmouth as suffering from minor adverse impact during the day and moderate adverse impact at night – DDC would welcome further engagement on this.</p>		<p>measurements during the day and night were undertaken here and observations were made to determine the baseline in this location.</p> <p>As described in the Scoping Report, the noise baseline was determined from a combination of long-term noise measurements close to the Proposed Development, and observations including short term measurements further from the airport. This approach is considered appropriate as undertaking long term measurements at all sensitive receptors would be impractical. The approach adopted focusses baseline monitoring on the locations where noise effects are expected to be highest while also enable the baseline to be characterised over a large area further from the airport.</p>
	<p><u>PEIR ch.12 – Noise</u></p> <p>DDC recommended that the time period should be quoted as 23.00 – 07.00.</p>	N	RiverOak agrees and notes that this has always been its intention.
	<p><u>PEIR ch.12 – Noise</u></p> <p>Further information on the following mitigation measure would be welcomed, ‘... no open field testing during the Night Time Period except where operationally urgent.’</p>	N	This is about engine testing, which will not be carried out at night unless operationally essential.
	<p><u>PEIR ch.12 – Noise</u></p> <p>DDC also recommends that West Stourmouth residents are consulted in relation to the proposed noise insulation scheme and that surveys to identify properties to be included are undertaken for this area of the DDC.</p>	N	This area is outside the noise contour to which insulation will apply.

	<p><u>PEIR ch.12 – Noise</u></p> <p>The noise and vibration assessment does not appear to include any properties within the Dover District, during both operation and construction phases.</p>	<p><u>N</u></p>	<p>Since scoping was undertaken the knowledge of the Proposed Development has developed and the extent of significant effects is better understood.</p> <p>Construction noise impacts from mobile and fixed plant on the airport construction sites would not generally be expected to extend beyond 300m from the works, hence impacts at receptors in DDC are unlikely. The construction noise assessment in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) has demonstrated that noise effects can be avoided at the closest noise sensitive receptors within 100m of the airport with the proposed mitigation measures.</p> <p>The effects of traffic noise during operation and construction have been assessed for all roads where a material change in noise could occur.</p> <p>The study area for noise extends out to the distance at which noise effects could occur. Modelling of aircraft noise has demonstrated most of DDC lies outside the Lowest Observed Adverse Effect (LOAEL) noise contour for daytime and night time noise. Hence adverse effects of noise are not expected at receptors within DDC. The exception is t West Stourmouth which was reported on in the 2018 PEIR.</p>
	<p><u>PEIR ch.13 – Socio-economics</u></p> <p>In order to fully appraise the impacts of such forecasts (jobs) on the economic and housing needs of the Dover District, comparative data from existing operations at Manston Airport is recommended.</p>	<p>N</p>	<p>We do not have the data for operations at the airport when it was previously open available.</p>
	<p><u>PEIR ch.13 – Socio-economics</u></p> <p>Proposed provision of an aviation training and education facility close to or within the Proposed</p>	<p>Y</p>	<p>RiverOak confirms that it will engage with DDC on this topic.</p>

	<p>Development site is welcomed as is the objective to engage with further and higher education providers. Early engagement is recommended.</p> <p>DDC would welcome engagement on maximising these opportunities.</p>		
	<p><u>PEIR ch.13 – Socio-economics</u></p> <p>DDC would like to further engage on the increasing links between connectivity and economic growth.</p>	Y	RiverOak confirms that it will engage with DDC on this topic.
	<p><u>PEIR ch.13 – Socio-economics</u></p> <p>Recommend giving consideration to hotels etc. within Sandwich Town due to its proximity to the site.</p>	N	<p>Hotels in the centre of Sandwich are approximately 4km from the site and within the category covered as “tourism businesses within the surrounding area (up to 5km)”. In Ramsgate, which is much closer to the site and dominant flight path, there are only slight rises expected due to aircraft noise, and the effects in Sandwich would be substantially less. Hotels in the surrounding area are expected also to benefit from increased demand for accommodation. (See PEIR para 13.10.3 and 13.10.4).The effect upon hotels etc. is considered within Chapter 13 of the ES, specifically within ‘Disturbance to Existing Tourism and Recreational Activities’. Please refer to paragraphs 13.8.78 – 13.8.82 (document reference TR020002/APP/5.2-2).</p>
	<p><u>PEIR ch.14 – Traffic and Transportation</u></p> <p>Further to the Council’s comments dated 21 July 2017, DDC supports the Applicant’s intention to submit the following as part of the DCO application:</p> <ul style="list-style-type: none"> - Operational Traffic Management Plan - Travel Plan - Public Transport Access Strategy 	N	<p>The Transport Assessment and its appendices (document reference TR020002/APP/5.2-15 – 5.2.25) includes the following:</p> <ul style="list-style-type: none"> • Car Park Management Strategy • A Travel Plan • An Airport Surface Access Strategy • A Public Rights of Management Plan • A Construction Traffic Management Plan

	<p>- Pedestrian, Cycle and Equestrian Access Strategy</p> <p>The District Council is keen to engage with the Applicant as the preparation of these documents advances.</p>		<p>RiverOak is content that these are coherent documents based on the methodology agreed with the key highways authority KCC. If DDC wish to engage with the development process the pre-examination and examination phase will be an appropriate time and we will be able to make amendments if necessary</p>
	<p><u>Manston Airport: A National and Regional Aviation Asset (Volume II)</u></p> <p>Paragraphs 5.5.6 and 5.5.7 in the updated consultation document, Manston Airport: A National and Regional Aviation Asset discuss the proposed provision of an aircraft recycling facility. Further information and clarification regarding the proposed logistics of forecast waste movements would be welcomed.</p>	N	<p>The forecast is for 10 arrivals per year for aircraft recycling as set out in the Azimuth Report (document reference TR020002/APP/7.4).</p>
	<p>Also appended response to first statutory consultation.</p>	N	<p>Responses to DDC's comments to the Stage 2 Consultation can be found in Table 7.3 above.</p>
Kent County Council (KCC)	<p>This response should be read in conjunction with previous responses to consultation:</p> <p>- statutory consultation – 21 July 2017</p>	N	<p>RiverOak notes this response. Responses to KCC's comments to the Stage 2 Consultation can be found in Table 7.3 above.</p>
	<p><u>PEIR ch.3 – Description</u></p> <p>3.3.93 states that where ground level reduction is required it would be undertaken by, "... earth moving machinery, which includes tracked dozers/shovels, articulated dump trucks and blade levelling vehicles."</p>	Y	<p>The appropriate investigations will be undertaken before commencement of construction works. Any intrusive works will be agreed in consultation with the appropriate bodies. Please refer to Chapters 5 and 9 of the ES (document reference TR020002/APP/5.2-1).</p>

	<p>This would not be acceptable in areas where there is archaeological potential that requires mitigation by investigation.</p>		
	<p><u>PEIR ch.7 – Ecology</u></p> <p>KCC would expect all ecological surveys to be undertaken to fully inform any proposed mitigation or compensation measures.</p> <p>It is notes that the proposed likely mitigation requirements (Based on worst case scenarios) are extensive and robust. However, KCC has concerns regarding the deliverability of any off-site compensation measures for breeding birds, and would expect to see further information demonstrating that the proposed measures are achievable and implementable.</p>	<p>Y</p>	<p>An ecological survey programme was provided in the 2017 and 2018 PEIRs. The ability to undertake further ecological surveys is dependent upon grant of access to the Proposed Development site which has not been forthcoming. Please see Chapter 5 of the ES (document reference TR020002/APP/5.2-1) for further details about the approach to the environmental impact assessment.</p> <p>A site for off-site mitigation has been identified; it will be secured before works start due to the provisions of Requirement 8 in the DCO (document reference TR020002/APP/2.1).</p>
	<p><u>PEIR ch.8 – Freshwater</u></p> <p>No further comments. This Chapter summarises KCC's position in relation to any requirements with a clear, concise summary of representations made by other relevant authorities.</p>	<p>N</p>	<p>RiverOak notes this comment.</p>
	<p><u>PEIR ch.9 – Historic Environment – paras 9.1.5 – 9.1.6</u></p> <p>An indicative Written Scheme of Investigation is not an appropriate alternative to actually undertaking studies, as it assumes that the impacts on the archaeology present in unevaluated areas can be mitigated through</p>	<p>N</p>	<p>Unsuccessful efforts have been made thus far to acquire the reports or to gain access to the site. Further investigation is therefore proposed (Chapter 9: Historic Environment, Sections 9.8-9.9, document reference TR020002/APP/5.2-1), the scope of which will be discussed with KCC, TDC and Historic England.</p> <p>Contingency planning for avoidance of archaeological remains by design can only be discussed in principle at this stage and is reflected</p>

	<p>investigation. Reference is made elsewhere to adjustment to enable preservation if required following post determination evaluation, however it is not clear that this would be possible within the development parameters once permitted.</p> <p>We remain of the view that:</p> <ul style="list-style-type: none"> - the environmental assessment needs to take account of the discoveries in the recent investigations within the airport; and - further survey and evaluation is needed in areas of the development proposals that have not yet been surveyed and/or evaluated. 		<p>by the flexibility inherent in outline masterplanning. For this reason, the assessment presented in Chapter 9 of the ES (document reference TR020002/APP/5.2-1) provides a ‘worst-case’ scenario, whereby it is assumed that highly significant remains will be present and in the absence of avoidance this is assessed as a significant adverse effect (see also Chapter 5: Approach to the ES, paragraphs 5.4.15-5.4.20).</p>
	<p><u>PEIR ch.9 – Historic Environment – paras 9.3.8</u></p> <p>The reference to Historic England confirmation that archaeological works can be secured by requirements in the DCO does not appear in Table 9.5. We believe that Historic England is of the same view as ourselves.</p>	<p>Y</p>	<p>Further consultation with Historic England (Chapter 9 Historic Environment, Table 9.4 of the ES (document reference TR020002/APP/5.2-1)) has confirmed a misinterpretation of an ambiguous comment, which has been amended in the ES.</p>
	<p><u>PEIR ch.9 – Historic Environment – Table 9.3</u></p> <p>The response to the KCC comment with respect to understanding certain sites outside the study area is not consistent with what had been agreed. The sites quoted are designated heritage assets rather than the archaeological investigations that illustrate the rich and unique character of Thanet’s archaeology.</p>	<p>Y</p>	<p>This has been revised and the relevant investigations are considered within Chapter 9 Historic Environment of the ES (document reference TR020002/APP/5.2-1), specifically Section 9.4 and Appendix 9.1 (document reference TR020002/APP/5.2-8 and 5.2-9).</p>

	<p><u>PEIR ch.9 – Historic Environment – Table 9.4</u></p> <p>Our position remains the same as discussed on 30 October 2017: further intrusive investigation is needed in the Northern Grass Area and Geophysical Survey.</p>	N	<p>Noted. Further investigation is proposed to be carried out when access is available (Chapter 9 Historic Environment, Sections 9.8-9.9 of the ES (document reference TR020002/APP/5.2-1) the scope of which will be discussed with KCC, TDC and Historic England. In the absence of these, the assessment presented in this ES provides a ‘worst-case’ scenario (see also Chapter 5: Approach to the ES, paragraph’s 5.4.15-5.4.20).</p>
	<p><u>PEIR ch.9 – Historic Environment – Table 9.5</u></p> <p>A WSI is not an appropriate alternative to evaluation to inform a decision. Alterations to the Proposed Development design may not be sufficient as they may be constrained by approved development parameters.</p>	N	<p>Noted. Contingency planning for avoidance of archaeological remains by design can only be discussed in principle at this stage and is reflected by the flexibility inherent in outline masterplanning. For this reason, the assessment presented in this ES (document reference TR020002/APP/5.2) provides a ‘worst-case’ scenario (see Chapter 5: Approach to the ES, paragraphs 5.4.15-5.4.20). .</p>
	<p><u>PEIR ch.9 – Historic Environment – Para 9.4.6</u></p> <p>The cropmarks on Telegraph Hill represent the evidence for the funerary activity and are not the focus in themselves. The EKA investigations investigated part of this activity but it is more widely known and a particularly rich heritage theme for Thanet.</p>	Y	<p>This has been amended in Chapter 9: Historic Environment, Section 9.4 of the ES (document reference TR020002/APP/5.2-1).</p>
	<p><u>PEIR ch.9 – Historic Environment – Para 9.4.7</u></p> <p>The Wantsum was more a sea passage to the Thames Estuary and a harbour and point of entry to the Roman province. The remaining part of this paragraph doesn’t make sense.</p>	Y	<p>This has been amended in Chapter 9: Historic Environment, Section 9.4 of the ES (document reference TR020002/APP/5.2-1).</p>
	<p><u>PEIR ch.9 – Historic Environment – Para 9.4.8</u></p>	N	<p>RiverOak notes this comment.</p>

	<p>Agree with the assessment of Thanet's landscape's role in the nation's history.</p>		
	<p><u>PEIR ch.9 – Historic Environment – Para 9.4.29</u></p> <p>The Roman road is not thought to follow the line of the A229 south of the airport. That is a more modern construct. The line of the main route is presently thought to lie slightly down slope south and west of the former airport but then swinging into the airport as discovered on the East Kent Access Road. There is a particular potential for Iron Age and Roman settlement found south of the airfield in the 1980s extending into the airfield.</p>	<p>Y</p>	<p>This has been amended in Chapter 9 Historic Environment, section 9.4 of the ES (document reference TR020002/APP/5.2-1).</p>
	<p><u>PEIR ch.9 – Historic Environment – Table 9.7</u></p> <p>We agree that there is potential for undesignated archaeological assets of up to national significance. The incorporation of preservation measures relies upon having sufficient information to inform the decision and design and to ensure that this preservation is feasible within permitted development parameters.</p>	<p>N</p>	<p>Further investigation is proposed (Chapter 9 Historic Environment, Sections 9.8-9.9, document reference TR020002/APP/5.2-1), the scope of which will be discussed with KCC, TDC and Historic England.</p> <p>Contingency planning for avoidance of archaeological remains by design can only be discussed in principle at this stage and is reflected by the flexibility inherent in outline masterplanning. For this reason, the assessment presented in Chapter 9 of the ES (document reference TR020002/APP/5.2-1) provides a 'worst-case' scenario (see also Chapter 5: Approach to the ES, paragraphs 5.4.15-5.4.20).</p>
	<p><u>PEIR ch.9 – Historic Environment – Para 9.8.5 and Table 9.14</u></p> <p>Without evaluation through survey and trenching the risk of encountering archaeological remains that cannot be preserved in situ due to the parameters of such permitted development remains high. The flexibility of development to</p>	<p>N</p>	<p>See comment above.</p>

	<p>avoid significant archaeology that warrants preservation is questionable, and as archaeology can be found at shallow depth engineering solutions are potentially limited.</p>		
	<p><u>PEIR ch.9 – Historic Environment – Para 9.9.3 and Table 9.14</u></p> <p>Historic structures of the former airfield are an important part of the historic sense of Manston and should be incorporated holistically where possible around the two museums. Preserving is much more favoured than recording.</p>	N	See comment above.
	<p><u>Appendix 9.1</u></p> <p>Limited in the availability of specific information from existing survey and trenching on site.</p> <p>KCC Heritage Conservation agrees with the recommendation that further archaeological survey and trenching is needed.</p>	N	RiverOak notes this comment.
	<p><u>Appendix 9.1</u></p> <p>Table 5.2 should also recognise the importance of remains of Roman date as well as those of regional significance.</p>	Y	Chapter 9: Historic Environment, Appendix 9.1 , Table 5.2 of the ES (document reference TR020002/APP/5.2-1) has been amended.
	<p><u>Appendix 9.1</u></p> <p>Historic England and the Thanet Conservation Officer should take the lead on the provision of advice relating to the impact of the proposals on the significance of designated heritage assets.</p>	Y	RiverOak notes this comment. We agree, although Historic England will have the final say in the case of disagreement.

	<p><u>PEIR ch.14 – Traffic and Transportation</u></p> <p><u>Para 14.1.1</u></p> <p>This section outlines a disparity in the data collection exercise. Further clarity regarding this disparity would be useful to understand how it might impact on the details TA.</p>	N	<p>The issues raised with the data collection exercise are set out in the Transport Assessment (document reference TR020002/APP/5.2-15) in further detail and it is not considered that these issues give raise to the validity of the assessments undertaken.</p>
	<p><u>PEIR ch.14 – Traffic and Transportation</u></p> <p><u>Para 14.2.4</u></p> <p>It is not clear if the new junctions take into account the requirements set out in the emerging Thanet Local Plan.</p>	N	<p>TDC is currently preparing a new Local Plan to guide the growth and development of the District up to 2031. The adopted version of the Thanet Local Plan is dated 2006 and covered the period up to 2011. Some policies in the adopted Local Plan have been 'saved.' Full regard has been had to these saved policies in the adopted Local Plan unless material considerations have indicated otherwise. Very little weight has been attached to the policies in the emerging new Thanet Local Plan due to the fact that is has been recently rejected and is being revised again. However, the Transport Assessment (document reference TR020002/APP/5.2-15) does take into account the emerging transport proposals in a sensitivity test, this located within Chapter 10 of the ES (document reference TR020002/APP/5.2-1).</p>
	<p><u>PEIR ch.14 – Traffic and Transportation</u></p> <p><u>Para 14.2.12</u></p> <p>KCC does not consider a signalised junction improvement to be the most appropriate solution at the B2050/Spitfire Way junction.</p>	N	<p>The detailed traffic and transport modelling of this junction sets out the need for a junction improvement and determines that a signalisation scheme is a suitable solution. It should be noted, as a result of the development proposals, the “nature of the roads around the northern airport boundary will change as a new roundabout, and three sets of signalised junctions are proposed along the access from the A299 as well as the widening of Spitfire Way and Manston Road”.</p> <p>The detailed geometric designs (to relevant Design Manual for Roads and Bridges standards) and associated transport models are included</p>

			within the Transport Assessment (document reference TR020002/APP/5.2-15).
	<p><u>PEIR ch.14 – Traffic and Transportation</u></p> <p><u>Para 14.1</u></p> <p>Limited reference is made to the emerging Thanet Transport Strategy.</p>	N	TDC is currently preparing a new Local Plan to guide the growth and development of the District up to 2031. The adopted version of the Thanet Local Plan is dated 2006 and covered the period up to 2011. Some policies in the adopted Local Plan have been ‘saved.’ Full regard has been had to these saved policies in the adopted Local Plan unless material considerations have indicated otherwise. Very little weight has been attached to the policies in the emerging new Thanet Local Plan due to the fact that it has been recently rejected and is being revised again. However, the Transport Assessment (document reference TR020002/APP/5.2-15) does take into account the emerging transport proposals in a sensitivity test, this located within Chapter 10 of the ES (document reference TR020002/APP/5.2-1).
	<p><u>PEIR ch.14 – Traffic and Transportation</u></p> <p><u>Para 14.4.2</u></p> <p>The manual classified turning count (MCC) locations are noted, however to fully identify junctions that are likely to be impacted by the proposals, a more detailed understanding of development traffic impacts / distribution would be required.</p>	N	<p>The scope of the junctions was agreed with KCC to match the wide scope of the strategic transport model it was developing at the time of 2018 statutory consultation. There are locations where traffic counts were conducted which were subsequently discounted, as no traffic impact was warranted.</p> <p>The Transport Assessment (document reference TR020002/APP/5.2-15) and associated figures set out a detailed methodology for the traffic generation and traffic distribution of the Proposed Development.</p>
	<p><u>PEIR ch.14 – Traffic and Transportation</u></p> <p><u>Para 14.4.11</u></p> <p>It is not entirely accurate to indicate that the model is unavailable to local developers; KCC has yet to receive a scope of works / specification for the</p>	Y	Since this comment was made, a formal request to use the model has been made and a detailed scoping/methodology note will be provided to KCC following the submission of this DCO. RiverOak remains committed to additional strategic traffic and transport modelling in conjunction with KCC to agree a set of proposals that will be required to allow development of the airport to come forward.

	<p>modelling scenarios from RiverOak to progress or facilitate any access requests.</p> <p>Given the scale of the Proposed Development, it is essential that an appropriate strategic highway model is utilised to appraise the impact of the development.</p>		
	<p><u>PEIR ch.14 – Traffic and Transportation</u></p> <p><u>Table 14.3</u></p> <p>It was not agreed by KCC Highways and Transportation that the use of a spreadsheet model would be sufficient for the initial submission of a DCO. KCC highly recommends that strategic modelling should be undertaken and fully completed in advance of the submission and completion of the TA.</p>	N	<p>Due to anticipated submission deadlines for the DCO, and initial feedback from KCC that the strategic model would not be available to be used until January/February 2018, it was not possible to be able to use the Strategic model in the Traffic and Transport works at this stage. If KCC does supply its strategic model in time before or during the examination, RiverOak will use it and provide the results as supplementary environmental information.</p> <p>As such, for the purposes of providing a detailed assessment within the Transport Assessment (document reference TR020002/APP/5.2-15) and Chapter 14 of the ES (document reference TR020002/APP/5.2-2) traffic and transport works to support this DCO application a first principal's complex spreadsheet model was proposed to be used, supplemented by a sensitivity test implementing some future year strategic network changes.</p> <p>RiverOak remains committed to additional strategic traffic and transport modelling in conjunction with KCC to agree a set of proposals that will be required to allow development of the airport to come forward.</p>
	<p><u>PEIR ch.14 – Traffic and Transportation</u></p> <p><u>Paras 14.10.5-14.10.6</u></p> <p>The environmental impacts of the development on Manston Court Road have been identified as minor. This is considered to be an</p>	Y	<p>The assessment provided as part of this DCO submission has been revised but this still indicates that impacts on this link are minor. Further context as to why this is has been provided, breaking traffic figures down to additional vehicles per minute from the development which are considered to be barely perceptible.</p>

	<p>underestimation. The road is largely single track and extremely sensitive to increases in traffic flow due to its constrained geometry. The same applies to Manston Village.</p>		
	<p><u>Appendix 14.3 – Traffic Generation and Distribution Methodology</u></p> <p>It is essential that the maximum freight handling capacity is robustly identified and justified, as this could have a material bearing on subsequent peak hour freight traffic figures.</p>	N	<p>The assessment within the Transport Assessment (document reference TR020002/APP/5.2-15) has been based on the likely HGV traffic generated by the development based on the figures we have been provided by the client's cargo and aviation experts that underpin the entire DCO application. The details of how these assumptions have been developed are set out in the Transport Assessment.</p>
	<p><u>Appendix 14.3 – Traffic Generation and Distribution Methodology</u></p> <p>Where has the 30% reduction in cargo tonnage that has been applied to allow for efficient HGV movements come from? This should be fully justified and evidenced.</p>	N	<p>The figures used to build the first principles traffic and transport mode including the 30% reduction in cargo tonnage for efficient HGV movements are based on estimated provided by the aviation experts imbedded within the Proposed Development team and based on experience at other airports. The details of how these assumptions have been developed are set out in the Transport Assessment (document reference TR020002/APP/5.2-15).</p> <p>The assumption that cargo movements take place evenly across the hour is based on how these sites traditionally operate. It is acknowledged that a worst case of the maximum HGVs leaving in an hour could have been undertaken, but it was felt this considering the low numbers of freight HGVs entering and exiting the network in an hour (in year 20 5 arrivals and 5 departures per hour) it would not be a material impact.</p>
	<p><u>Appendix 14.3 – Traffic Generation and Distribution Methodology</u></p>	N	<p>Please refer to comment above.</p>

	<p>Have not taken a worst case scenario look as the volume of traffic has been assessed as being consistent across the day.</p>		
	<p><u>Appendix 14.3 – Traffic Generation and Distribution Methodology</u></p> <p>A number of assumptions have been made for proposed passenger flights that could have an impact on subsequent traffic generation. For a robust assessment, a realistic maximum passenger throughput should be estimated.</p>	<p>N</p>	<p>The development proposals and traffic generation of this Chapter of the Transport Assessment (document reference TR020002/APP/5.2-15) sets out the methodology used to develop the passenger traffic generation. The assumptions used have been provided from aviation experts on the wider Proposed Development team for the assumptions on mode share, staff shifts and passenger occupancy as well as information extracted from the CAA data. The details of how these assumptions have been developed are set out in the Transport Assessment.</p>
	<p><u>Appendix 14.3 – Traffic Generation and Distribution Methodology</u></p> <p>The methodology of using TRICS to inform Northern Grass area trip rates is largely accepted, however as outlined within the recent TA scoping exercise, this is based on the understanding that land uses in this area of the site are restricted to the proportions as outlined within the assessment document.</p>		<p>The land use mix and site area GFA have been fixed in the masterplan and this matches what has been assessed in the Transport Assessment. The DCO restricts the site to the same mix of uses – see works nos. 15-17 (document reference TR020002/APP/2.1).</p>
	<p><u>Appendix 14.3 – Traffic Generation and Distribution Methodology</u></p> <p>Need to provide further justification in relation to the number of deliveries required to service the site (fuel tankers) in a worst case scenario.</p>	<p>N</p>	<p>Further details of the development of fuel farm tanker trips are set out in paragraphs 6.5.28 to 6.5.31 of the Transport Assessment (document reference TR020002/APP/5.2-15). It is based on capacity of the tankers that are predicted to be used, the fuel required per year which has then been broken down to understanding the fuel requirements per day.</p>

			It should also be noted that tankers are not required on a one tanker vs one aircraft ratio, tankers are required as and when just to keep the reserves topped up to a certain level at the fuel farm.
	<p><u>Appendix 14.3 – Traffic Generation and Distribution Methodology</u></p> <p>It is unrealistic to assume that all staff movements will occur outside of the network peak hours and that staff will all follow the same shift patterns.</p>	N	Differing staff members have differing shift patterns, arrival times and departure times depending on the job that is being undertaken in the traffic generation methodology set out in section 6.4 of the Transport Assessment (document reference TR020002/APP/5.2-15). It is a key to note that airports are not traditional 9-5 business working hours and as such a majority of staff strips do not have an impact on the peak hours. 24-hour shift patterns and the differing requirements of an airport and cargo handling facility across the day mean that staff have a wide range of travel times.
	<p><u>Appendix 14.3 – Traffic Generation and Distribution Methodology</u></p> <p>Further information to substantiate the assumptions made on origins and destinations would be helpful to support the TA document.</p> <p>For the Northern Grass uses, it would be more appropriate to use census data to provide an improved local perspective and this could be derived by interrogating the data for local output areas that encompass other key employment areas within the Thanet District to provide a more robust basis for assessment.</p>	N	The gravity models that have been prepared are based on the journey to work census data from 2011 for Thanet and where required further afield. Details of this methodology are set out in Chapter 6 of the Transport Assessment (document reference TR020002/APP/5.2-1).
	<p><u>Masterplan</u></p> <p><u>Highway and Transportation</u></p>	Y	As requested by KCC, this link in the emerging local Thanet Transport Strategy has been considered as part of the sensitivity test set out in the Transport Assessment (document reference TR020002/APP/5.2-15).

	<p>Provision of a new highway link between A256 Haine Road and the B2050 Manston Road, as outlined in the emerging Thanet Transport Strategy, is absent from the proposed masterplan.</p>		<p>However, as set out in Chapter 2 of the Transport Assessment, issues with the emerging Local Plan mean that this sensitivity test is provided to address KCC consultation responses, rather than an acknowledgement of the status of the emerging/draft plans.</p>
	<p><u>Masterplan</u> <u>Highway and Transportation</u></p> <p>Concerns in relation to the absence of provision for a new highway route to and from Westwood, including appropriate walking and cycling links.</p>	<p>Y</p>	<p>Please refer to comment above.</p>
	<p><u>Masterplan</u> <u>Highway and Transportation</u></p> <p>An initial appraisal would suggest that a signalised junction arrangement at Spitfire Way is not an optimal form of junction and is potentially out of keeping with the nature of the approach roads to the site.</p>	<p>N</p>	<p>The detailed traffic and transport modelling of this junction sets out the need for a junction improvement and determines that a signalisation scheme is a suitable solution. It should be noted, as a result of the development proposals, the “nature of the roads around the northern airport boundary will change as a new roundabout, and three sets of signalised junctions are proposed along the access from the A299 as well as the widening of Spitfire Way and Manston Road”.</p> <p>The detailed geometric designs (to relevant Design Manual for Roads and Bridges standards) and associated transport models are included within the Transport Assessment (document reference TR020002/APP/5.2-15).</p>
	<p><u>Masterplan</u> <u>Highway and Transportation</u></p> <p>It is strongly recommended that access at the B02050 Manston Road is restricted to emergency access to manage traffic flow at the Spitfire Junction and traffic flow on the B2050.</p>	<p>N</p>	<p>There is no proposal for a priority junction onto Manston Road from the south between Spitfire Way and the Airport Access. This was something shown on a previous masterplan which has now been removed from the proposals.</p> <p>It's not clear to RiverOak what vehicles on what routes could potentially rat run though the northern grass areas, as there are very few HGVs using Manston Road to the North.</p>

	<p><u>Masterplan</u></p> <p><u>Highway and Transportation</u></p> <p>A full Stage 1 Road Safety Audit and associated designer's response will be required for all proposed highway changes. In view of the above comments, it would not be possible to provide a definitive steer on the acceptability of the proposed highway alterations.</p>	N	<p>This has not been included at this stage of the DCO submission, but as with all highways improvements will be provided at the appropriate time.</p>
	<p><u>Masterplan</u></p> <p><u>Highway and Transportation</u></p> <p>The B2190 Spitfire Way (Between Columbus Avenue and the proposed site access) is not suited to a significant increase in HGV movements. No improvement are shown on the masterplan but section 14.2.12 of the PEIR refers to potential improvements but with limited clarity on what these are.</p>	Y	<p>The final masterplan proposals are to widen Spitfire Way from Columbus Avenue to Spitfire Way and also Manston Road from Spitfire Way to the Airport Access. This route is identified as the key HGV route to the site and as such it is agreed that the route needs to be widened to a 7.3m wide carriageway for the entirety of the length.</p> <p>The details of these improvements schemes are set out in detail in the Transport Assessment (document reference TR020002/APP/5.2-15).</p>
	<p><u>Masterplan</u></p> <p><u>Highway and Transportation</u></p> <p>The increase in on-site parking provision is noted. The ability of the main site access junction onto the B2050 Manston Road to accommodate the potential increase in demand will need to be examined within the detailed TA.</p>	Y	<p>Detailed traffic assessments of the site access junction are included within the Transport Assessment (document reference TR020002/APP/5.2-15), specifically within Chapter 9.</p>
	<p><u>Masterplan</u></p>	N	<p>Details on the proposed accesses (formal) and any informal accesses are set out in the Access and Rights of Way Plans (document reference</p>

	<p><u>Highway and Transportation</u></p> <p>The ability for traffic (particularly HGVs and abnormal loads) to enter and leave the site in a forward gear should be demonstrated in the final submission.</p>		<p>TR020002/APP/4.6). For clarity however, the Transport Assessment sets out the issues with the operational accesses into and out of the proposed site. All of the accesses have been designed as formal DMR B compliant access junctions which would not present any issues for vehicles to leave in a forward gear. This is outlined within Chapter 9 of the Transport Assessment (document reference TR020002/APP/5.2-15).</p> <p>Informal accesses primarily refer to crash gates which are simply not used unless there is an airport emergency. This is the only time any informal access will be allowed onto the site.</p>
	<p><u>Masterplan</u></p> <p><u>Heritage</u></p> <p>Includes areas of new development that have not been included in archaeological geophysical survey and evaluation trenching at the site.</p>	Y	<p>Further investigation is proposed (Chapter 9 Historic Environment, Sections 9.8-9.9 of the ES (document reference TR020002/APP/5.2-1), the scope of which will be discussed with KCC, TDC and Historic England. In the absence of these, the assessment presented in Chapter 9 of the ES provides a ‘worst-case’ scenario (see also Chapter 5: Approach to the ES, paragraphs 5.4.15-5.4.20).</p>
	<p><u>Masterplan</u></p> <p><u>Heritage</u></p> <p>The areas north of Manston Road includes a number of built heritage assets and it is unclear in the Masterplan which ones will be retained.</p> <p>The museums area appears to be located between the business park and attenuation ponds, screened from a visual connection with the runway by the cargo hangers – this does not take into account the heritage setting. Chapter 3 of the PEIR does not assist in the understanding of this issue.</p>	Y	<p>Further survey is proposed (Chapter 9 Historic Environment, Section 9.9 of the ES (document reference TR020002/APP/5.2-1) to identify condition and potential for sustainable use of built heritage assets, the scope of which will be discussed with KCC, TDC and Historic England, and the results with the museums.</p> <p>Contingency planning for incorporation of built heritage assets by design can only be discussed in principle at this stage and is reflected by the flexibility inherent in outline masterplanning. For this reason, the assessment presented in this ES provides a ‘worst-case’ scenario (see Chapter 5: Approach to the ES, paragraphs 5.4.15-5.4.20).</p> <p>The setting of non-designated built heritage assets is assessed at Chapter 9 Historic Environment, Section 9.4 of the ES (document reference TR020002/APP/5.2-1) and concludes that substantial</p>

			changes to the airfield over time, including the bisection by the Manston Road, has had an impact on the heritage setting of these assets.
	<p><u>Noise Mitigation Plan</u></p> <p>General comments about the fact that an increasing number of studies have shown a link between noise from aviation and deterioration in health and quality of life as well as educational attainment in children.</p> <p>Vital to keep communities engaged and ensure that they can influence decisions that could change the way they experience noise. The design of the Noise Preferential Routes (NPRs) must include substantial community engagement as per the new Airspace Change Process.</p>	N	<p>RiverOak has assessed flight ‘swathes’ and local residents can be reassured that the flights will be kept to those swathes. Should the applied for DCO be granted, RiverOak will develop and submit an ACP to the CAA. Under the ACP, the CAA will expect the airport to develop proposals which seek to quantify and minimise environmental impact. The process includes a further round of environmental impact assessments and public consultation on the specific flightpaths being proposed. Proposed flightpaths will have to be within the proposed swathes; if RiverOak wishes to propose flightpaths which are beyond these then we will have to apply to amend the DCO to match them.</p> <p>The potential impacts of the Proposed Development are set out in the technical Chapters of the ES along with proposed mitigation measures (document reference TR020002/APP/5.2-1 – 5.2-3).</p>
	<p><u>Noise Mitigation Plan</u></p> <p>Using the Nx threshold would be helpful – as it would clarify the number of times a person is likely to hear an aircraft above a specific noise level during either the day or the night period.</p>	N	<p>This is addressed in Chapter 12 of the ES (document reference TR020002/APP/5.2-2).</p>
	<p><u>Noise Mitigation Plan</u></p> <p>Heathrow, Gatwick, Stansted and Bristol Airport use a movement limit as well as a voluntary Quota Count. The Noise Mitigation Plan does not propose this. KCC would like to see this to provide some comfort.</p>	N	<p>RiverOak is proposing a freight airport which needs more flexibility in terms of movement numbers as the exact fleet mix and type of freight to be handled at the airport are not yet known. The noise based quota (for more information see Noise Mitigation Plan (document reference TR020002/APP/2.4)) is sufficient to mitigate the main impact of the airport. Movement limits are not sensitive to the size or noise certification of an aircraft and, as a result, they are not as successful in mitigating that noise impact.</p>

	<p><u>Noise Mitigation Plan</u></p> <p>Other Airports have a separate Quota Count for summer and winter, which would mitigate e.g. against all of the count being used up over summer. KCC would like to see a seasonal split.</p>	N	<p>RiverOak is aware that airports in London and elsewhere have seasonal limits. The reason for this is that the airports are largely passenger airports with a bias towards flights occurring in the summer due to demand (which explains the higher quota levels for that season). The business model for Manston will be very different and will concentrate on cargo flights which do not have the same seasonal element. A seasonal limit is therefore not appropriate.</p>
	<p><u>Noise Mitigation Plan</u></p> <p>Proposed Quota Count is 4,000 plus 2,000 for shoulder period for passenger aircraft between 06.00 and 07.00.</p> <p>Bristol Airport has a quota of 2160, Heathrow has 5150, Gatwick has 6935.</p> <p>This is substantial and especially so with the absence of a movement limit. KCC is concerned about the number of night flights that could arise in the night time.</p> <p>KCC asks that this be given considerable review. At Gatwick, the 2017 winter limit Quota Count was 2000 with actual usage of 953 and that equated to an average of 18-20 flights a night.</p>	Y	<p>In the light of comments made during the 2018 statutory consultation, the figure has been reduced to 3028.</p>
	<p><u>Noise Mitigation Plan</u></p> <p>The Plan does not take into account the new category for use of aircraft with a QC/0.125, which are currently in the Manston Plan as exempt. KCC would like this updated to reflect the reality.</p>	N	<p>RiverOak has not taken into account this new category as it is not a category in which any aircraft fall and it would therefore be premature to do so.</p>

	<p><u>Noise Mitigation Plan</u></p> <p>The Plan does not permit QC/8 or QC/16 to take-off or land at night. This implies that QC/4 will be able to – this is not allowed at Heathrow, Gatwick or Stansted where scheduled flights of QC/4 are not allowed. KCC asks that a ban on QC/4 aircraft is in place between 2300 and 0700.</p>	N	<p>The aircraft that are used in cargo operations are different to those used in passenger operations and are often heavier. A cargo airport therefore needs more flexibility to allow the use of planes classified as QC4 at night. The noisiest QC8 and QC16 planes that caused concern for residents during previous operation of the airport are banned outright at night.</p>
	<p><u>Noise Mitigation Plan</u></p> <p>KCC supports the proposed noise insulation scheme and criteria for eligibility but asks that a reasonable amount of discretion be given.</p>	N	<p>RiverOak maintains that it is necessary to codify the noise insulation scheme. However, this does not preclude the exercise of discretion on a case by case basis.</p>
	<p><u>Noise Mitigation Plan</u></p> <p>KCC welcomes the suggestion of working with aircraft operators to encourage procedures that minimise noise. It welcomes the proposed structure of fines, but suggests that their level is reviewed once the Consultative Committee is formed. The use of income from these fines to fund community Proposed Developments in the area directly affected by noise from the airport is a practical and welcome approach.</p>	N	<p>The consultative committee cannot alter the fines, as we wished our Noise Mitigation Plan to contain commitments that were not able to be varied. However we could consider introducing flexibility as part of the DCO examination.</p>
	<p><u>Noise Mitigation Plan</u></p> <p>KCC would like to be represented on a Consultative Committee as it was in the past and currently is on the Gatwick Airport Consultative Committee. KCC has significant experience in issues of aviation noise because of the experience</p>	Y	<p>RiverOak agrees that it will seek to include KCC on the Manston Airport Consultative Committee.</p>

	of West Kent resulting from Gatwick Airport and would bring this to the newly formed committee for Manston.		
Surrey County Council	No comments	N	RiverOak notes this response and thanks Surrey County Council for responding to the consultation.
Thanet District Council (TDC)	Regard should also be had to the Council's first response to the previous formal consultation earlier this year (dated 21st July 2017)	N	<p>Noted – see Table 7.3.</p> <p>After this response was received on Friday 16 February, RiverOak then received an email on Tuesday 20 February from Cllr Bob Bayford, who was subsequently elected leader of the Council on 1 March, asking it to disregard TDC's Stage 3 response 'as unrepresentative and flawed'. A further letter was then received on 28 March from Cllr Bayford saying that he does not fetter analysis of the project by his officers'.</p> <p>RiverOak therefore have had very little time to adhere to the latest instruction. It has had regard to the responses but has been unable to change the application documents to any significant degree as a result. If TDC maintain these points in their relevant representation they will be responded to in more detail.</p>
	<p><u>Business Plan</u></p> <p>The updated work by Azimuth Associates still fails to adequately consider the importance of the significantly lower cost of belly-hold freight capacity and the peninsular location of Manston within the UK and the South-east, and it fails to show how the Proposed Development would overcome these fundamental limitations.</p>	N	RiverOak disagrees.

	<p><u>Funding</u></p> <p>The lack of any cogent business case for how the Proposed Development will be funded and delivered has also not been addressed in the second consultation, nor have any reasoned or transparent financial projections been provided.</p>	N	A Funding Statement is submitted with the application (document reference TR020002/APP/3.2).
	<p><u>NSIP status</u></p> <p>Within your consultation documents the current capability of the airport in terms of flights is stated as zero. It is noted that this figure is contested by the owners of the airport site. This will form a key determination for the Planning Inspectorate when deciding whether the Proposed Development constitutes a National Significant Infrastructure Proposed Development (NSIP)</p>	Y	RiverOak considers the Proposed Development to be an NSIP and justification is included as part of the application (document reference TR020002/APP/2.3).
	<p><u>Local Plan</u></p> <p>The Preliminary Environmental Information Report (PEIR) does not include the Proposed Revisions to the draft Local Plan (preferred options) from January 2017 in its analysis of local policy in various sections, however it includes the January 2015 consultation, which has equal weight in decision making at this stage in the production of the Council's Local Plan. The ES (ES) should be updated to reflect the correct local policy framework.</p>	N	The draft local plan is no longer a material consideration.

	<p><u>Jobs</u></p> <p>the new PEIR states that the Proposed Development would bring “ 4,000 direct and 30,000 indirect jobs to the local economy by 2038</p>	Y	A sensitivity test is included in the application – see the socio-economic Chapter 13 of the ES (document reference TR020002/APP/5.2-2).
	<p><u>Economic area</u></p> <p>The economic area, be it the ‘wider regional economy’ or “local economy”, is not defined in any of the consultation documentation and this should be added to the ES.</p>	Y	See the socio-economic Chapter 13 of the ES (document reference TR020002/APP/5.2-2).
	<p><u>PEIR: Socio-economic Chapter</u></p> <p>It is noted that the consultee comments of section 13 of the PEIR does not include the Council’s previous comments, unlike the assessments made in other sections of the PEIR. There remains significant uncertainty about whether the socio-economic benefits from your Proposed Development in terms of job creation attract significant weight in support of the Proposed Development, with these benefits overstated in Section 13 of the PEIR. It is not considered that the effect on the economy of Thanet would be “major beneficial - significant” due to the limitations in the evidence produced.</p>	N	RiverOak disagrees and maintain its assessment.
	<p><u>Northern Grass</u></p> <p>The proposed commercial development on the northern grass does not appear to be functionally required for operational purposes of the airport and</p>	N	The Northern Grass is part of the Proposed Development and is restricted to airport-related business development.

	<p>should not form part of the Proposed Development's viability assessment. This development could be situated on allocated employment land within the district, such as Manston Business Park.</p>		
	<p><u>Employment and Housing Land Technical Report'</u></p> <p>The report produced makes basic and fundamental errors in its analysis of additional sites, including using out-of-date SHLAA information, identifying some sites already recommended for inclusion, double-counting of sites, assuming that all sites submitted are acceptable (ignoring obvious environmental constraints and the Council's sustainability appraisal), whilst the analysis of the potential economic growth in the plan period includes inaccuracies and a lack of understanding of the relationship between housing numbers and expected job growth.</p>	<p>N</p>	<p>RiverOak disagrees with this analysis.</p>
	<p><u>Employment and Housing Land Technical Report'</u></p> <p>this report fails to address the matters raised in our previous consultation response, that the implications of the job creation purported from this Proposed Development would significantly affect the OAN for housing within the East Kent region. The impact is a likely significant increase in housing land requirements in Thanet. This may</p>	<p>Y</p>	<p>This has now been included in the Planning Statement (document reference TR020002/AP/7.2).</p>

	result in indirect effects, such as additional loss of countryside through housing development and significant new infrastructure demands, which has not been assessed in the PEIR.		
	<u>PEIR: Landscape</u> Ramifications of job creation have not been adequately assessed in landscape Chapter	N	RiverOak disagrees.
	<u>PEIR: Socio-economic</u> Specific surveys of the location and character of vulnerable groups and community facilities to be undertaken do not appear to be provided in the PEIR, with more details to be provided in the ES. We will await this information, and request that the potential for local employment and training during construction and operational phase be outlined in full in the ES and subsequently secured via appropriate obligations, as per our previous comments.	N	Local employment will be a priority, within legal constraints.
	<u>PEIR: Socio-economic</u> Previous comments raised regarding the use of out-of-date data are relevant, as the tourism profile of the district provided within the PEIR has not been updated to reflect available data on visitors from the 2015 Cambridge Economic Impact Model,	N	The Cambridge model has been used.
	<u>PEIR: Socio-economic</u>	N	Chapter 13 of the ES (document reference TR020002/APP/5.2-1) now contains the full socio-economic assessment.

	<p>Information on how the likely effects on local amenity, businesses, the destination and the experience of visitors will be mitigated by environmental measures has not been outlined in PEIR, with the significance level of effect not yet assessed on key areas such as disruption to local communities and amenity effect on tourism during operation of the airport.</p>		
	<p><u>PEIR: Socio-economic</u></p> <p>As previously outlined, all indicative flight paths would travel over Ramsgate, and night flight mitigation (see Noise and impact on living conditions section) would not impact on the multiple flights during the day that could adversely affect local business, inward investment, the expanding filming industry and a successful tourism sector. We await the further assessments to inform necessary mitigation before commenting on whether these impacts are significantly harmful to local communities, business and tourism in the district</p>	<p>N</p>	<p>Chapter 13 of the ES (document reference TR020002/APP/5.2-1) now contains the full socio-economic assessment.</p>
	<p><u>PEIR: Noise</u></p> <p>the scope of the aircraft and ground noise assessments are generally considered appropriate and consistent with policy and current guidance at this stage. The methodology and approach to assessing and controlling noise from sources of this nature is detailed in Appendix 12.5 and is considered to offer a reasonable approach at this</p>	<p>N</p>	<p>Noted. This is not a specific requirement, but noise is controlled via the mitigation proposed in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) and the Noise Mitigation Plan (document reference TR020002/APP/2.4).</p>

	<p>stage. The PEIR states that noise from these sources shall be controlled such that the “rating level at the worst noise affected property minus the background level is not more than -5 when assessed in accordance with BS4142”. This is considered a reasonable approach and should become a Development Consent Order (DCO) Requirement.</p>		
	<p><u>Mitigation</u></p> <p>The PEIR commits in a number of locations in the document to a specific course of action or outcome these should become conditions or requirements for DCO. It would be helpful if there was a table to track these commitments through the ES and the planning stages.</p>	Y	<p>RiverOak is providing a register of environmental actions and commitments (document reference TR020002/APP/2.5).</p>
	<p><u>PEIR: Noise</u></p> <p>The scope of the construction noise, construction vibration and construction traffic noise assessments are generally considered appropriate and follow relevant guidance.</p>	N	<p>RiverOak notes this comment.</p>
	<p><u>PEIR: Noise</u></p> <p>The scope of the phasing of the development and associated phasing overlaps are unclear. Paragraph 12.4.15 states that Year 2 is 2021 and year 20 is 2039, whilst paragraph 12.9.3 states 2020 as being Year 0 and 2026 as Year 15</p>	Y	<p>These inconsistencies have been removed.</p>

	<p><u>PEIR: Noise</u></p> <p>Cumulative and combined impacts from the various sources have not been assessed at this time.</p> <p>This will be required as part of the ES.</p>	Y	<p>Assessment of cumulative effects is included in the ES (Chapter 18) (document reference TR020002/APP/5.2-3).</p>
	<p><u>PEIR: Noise</u></p> <p>The methodology and data gathering for assessment of aircraft and ground noise are generally considered appropriate.</p>	N	<p>RiverOak notes this comment.</p>
	<p><u>PEIR: Noise</u></p> <p>There have been no aircraft operating at Manston since 2014. The population considered in the study area can therefore be considered to be newly exposed to aircraft noise - it is not clear how the implications arising from this being a newly exposed population are being considered or how they may modify the effects. For example, there is evidence that initial annoyance responses may be greater at opening than the standard exposure response suggests, but over time this can moderate. As noted later in the report, the number of dwellings exposed to LOAEL increases over the 20 year assessment period. Consideration should be given to the changing response over this time. It is noted however that there is no current methodology for applying the implications of this apparent habituation.</p>	N	<p>The baseline assumes the airport is not operating.</p>

	<p><u>PEIR: Noise</u></p> <p>Table 12.14 identifies “impact criteria” for non-residential receptors. The table title appears to be incorrect referring to “non-sensitive” receptors rather than “non-residential”. The identified impact criteria are considered appropriate for the categories defined. However, the potential effects are considered to be understated for schools and hospitals. For schools, the effect of noise is a developmental delay (at least in Primary Schools) resulting from change in noise levels. For hospitals there is evidence that there are delays to recovery if noise levels are significant enough. In both cases the higher noise level and change the worse the effect. This should be noted and addressed.</p>	Y	<p>This is noted and addressed in the noise and health Chapters (12 and 15) of the ES (document reference TR020002/APP/5.2-2).</p>
	<p><u>CAA consent</u></p> <p>Concerns may arise associated with the lack of detailed definition of the airspace design and therefore lack of certainty over the effects from airborne aircraft noise. The airspace design process as presented in CAP1520 (and adopted for this Proposed Development) requires assessment of effects from aircraft noise in the same terms relating to government aims of noise policy as per the Noise Policy Statement for England. Further stages of consultation are required through that process.</p>	N	<p>All of the relevant consents will be applied for.</p>
	<p><u>PEIR: Noise</u></p>	N	<p>RiverOak maintains its approach is sufficient.</p>

	<p>In considering the effects of night flights, the methodology goes beyond the requirements of policy in its consideration of “objective awakenings”. However, there is a lack of clarity on how this is considered, assessed and derived. Further explanation of the concept of “objective awakenings” and how this considers events rather than just average noise levels should be provided in the ES, in particular explanation should be provided in non-technical language as, far as possible.</p>		
	<p><u>PEIR: Noise</u></p> <p>Paragraph 12.6.8 appears to scope out “Quiet Areas” on the basis that it is “understood that there are no areas within the study area that would be referred to in the NPPF as being prized for their recreational and amenity value”. Clarity is sought on where this understanding comes from. Figure 11.38 indicates that there are many areas at the more tranquil end of the tranquillity spectrum (as defined by the Campaign to Protect Rural England). Whilst it is recognised that “Quiet” is not the only determinant of tranquillity, clarity should be sought on how these areas are being considered in the assessment and where the understanding that there are no quiet areas is derived from.</p>	<p>N</p>	<p>This is based on RiverOak’s environmental consultants’ research.</p>
	<p><u>PEIR: Noise</u></p> <p>Appendix 12.3 describes the methodology in more detail. In the “options appraisal approach” the use</p>	<p>N</p>	<p>RiverOak maintains its approach is sufficient.</p>

	<p>of WebTAG for monetisation is identified but this does not feature in the main body noise and vibration section (i.e. Chapter 12). In Appendix 12.3 it is indicated that one of the dose-response relationships used in WebTAG has been replaced stating that “dose response cover replaced by RIVM 2014 as it was identified as being the best fit for the Proposed Development”. Clarity should be sought on what this means and on the rationale for adopting the RIVM 2014 approach which is not referenced nor described anywhere else in the documentation and the implications of this are not clear or explained for the analysis.</p>		
	<p><u>PEIR: Noise</u></p> <p>Policy requires that WebTAG be the primary tool for assessing effects, other methods can be applied but these should be as a secondary, sensitivity analysis. Clarity is required on how the RIVM 2014 dose response relationship has been applied, the evidence base for applying this and the precedent in this context (there is no alignment with policy) and whether the results presented in the options appraisal are based on that or WebTAG and whether any sensitivity analysis is available. At the ES, all the options appraisal should primarily present WebTAG results, anything else must be treated as a sensitivity analysis.</p>	<p>N</p>	<p>Again, RiverOak has not amended its approach and this can be explored during examination if TDC still has queries.</p>
	<p><u>PEIR: Noise</u></p>	<p>N</p>	<p>The 2016 WebTAG has been used.</p>

	<p>The WebTAG spreadsheets for aircraft noise were updated towards the end of 2017 to enable analysis to 1dB resolution (previously 3dB bands) and to consider population rather than dwellings. Scheme appraisal for the ES should be undertaken with the latest version.</p>		
	<p><u>PEIR: Noise</u></p> <p>The BS5228:2009+A1:2014 “ABC Method” has been used and Category C thresholds are identified in Chapter 12 to correlate with SOAEL and Category B and Category A thresholds as LOAEL. This is not a precise interpretation with the notes to Table E.1 in BS5228. Note 1 to Table E.1 (in BS5228) states “A potential significant effect is indicated if the LAeq,T noise level arising from the site exceeds the threshold level for the category appropriate to the ambient noise level”. Therefore a potential significant effect could occur at thresholds lower than interpreted in the Chapter 12 assessment. It is noted that there are a number of “static caravan” type homes at locations around the airport and given the lower level of sound reduction from the building envelop a potential significant effect may occur at these lower levels, in particular at night. These static caravans are detailed in the landscape assessment but do not appear to be mentioned in the noise and vibration assessment.</p>	<p>N</p>	<p>RiverOak maintains its approach is sufficient.</p>
	<p><u>PEIR: Noise</u></p>	<p>N</p>	<p>RiverOak maintains its approach is sufficient.</p>

	<p>The earthworks activities may require consideration of Section E.5 of BS5228:2009+A1:2014. This section gives guidance on the application of criteria to long term earthworks more akin to mineral extraction than conventional construction activity. BS5228 suggests that the limit of 55 dB LAeq,1h is adopted for daytime construction noise for these types of activities but only where the works are likely to occur for a period in excess of six months. Precedent for this approach has been set within a number of landmark appeal decisions associated with the construction of ports. Whilst it is noted this criteria is not commonly applied it could be considered applicable given the scale and duration of the earthworks at the airport.</p>		
	<p><u>PEIR: Noise</u></p> <p>The construction noise assessment does not give both typical and worse-case noise levels. Appendix 12.3.1 details they are construction levels when the activity is at the closest work area to a receptor and therefore can be considered as worse-case noise levels. It is noted that the core construction hours are stated as 0800 to 1800 yet a LAeq,12hr is given. Similarly the night time noise assessment uses a LAeq,8hr noise level whereas BS5228 uses LAeq,1hr for the assessment of night time noise.</p>	<p>N</p>	<p>RiverOak maintains its approach is sufficient.</p>

	<p><u>PEIR: Noise</u></p> <p>The construction noise levels are described in Appendix 12.3 as being a $L_{pAeq,T}$ as a free-field level relating to a position 3.5m from any building. Free-field noise levels have been used in the baseline survey. It is noted if a facade correction is applied to consideration of a point of interest 1m from the façade of a sensitive receptor then predicted construction noise levels will be higher. Appendix 12.3 states that assessment considers conservative daily noise levels calculated from the worst case location in the working area. It is noted if a façade correction is added to some of the predicted noise levels the apparent threshold may be exceeded e.g. Table 12.17 Receptor 1, Receptor 8 and Receptor 9.</p>	N	RiverOak maintains its approach is sufficient.
	<p><u>PEIR: Noise</u></p> <p>The methodology adopted for the calculation of vibration levels from construction activities is that advocated within Transport and Road Research Laboratory Research Proposed Development 429 – Ground borne vibration caused by mechanised construction works and BS5228-2:2009+A1:2014 ‘Code of practice for noise and vibration control on construction and open sites – Part 2: Vibration’. The assessment is limited to 100m and is consistent with the aforementioned guidance. This approach is consistent with guidance and contemporary assessments.</p>	N	RiverOak notes this comment.

	<p><u>PEIR: Noise</u></p> <p>The assessment adopts a VDV of 0.2 as the criteria for the onset of a significant effect. The assessment predicts PPV of 3.6 mms-1 external to sensitive receptors but no significant effect is identified as the VDV does not meet the criteria for a human response significant effect. Though the VDV response, is not met other contemporary assessments use PPV criteria for human response and a PPV of 3.6 mms-1 can be considered a significant effect, depending on the duration. The duration of the anticipated PPV of 3.6 mms-1 and the number of receptors affected is not described and so the significance is not clear. It is also not clear if vibrations during start up and shut down of vibratory compaction equipment have been considered. Clarification is required as to the duration of the potential effect from vibratory compaction and whether the start-up and shut-down of compaction equipment has been considered. The ES should clarify whether or not this results in a significant effect that is currently not identified.</p>	N	RiverOak maintains its approach is sufficient.
	<p><u>PEIR: Noise</u></p> <p>The baseline noise levels for the periods used to establish the BS5228 ABC category are detailed in Appendix 12.4. The expanse of the survey is considered generally suitable although it is noted that the reporting does not include night time</p>	N	RiverOak maintains its approach is sufficient.

	<p>L_{Aeq},1hr baseline noise level used in the ESs for recent high profile schemes where construction working at night is required, such as for HS2 and Tideway. The PEIR suggests that night time construction may be required in Phases 2-4 and as such regard should be given to night time L_{Aeq},1hr baseline noise levels.</p>		
	<p><u>PEIR: Noise</u></p> <p>The baseline surveys for the Chapter 12 assessment, reported in Appendix 12.4 indicate a L_{Aeq},8hr has been used and when the variation in L_{Aeq},1hr levels over the quietest part of the night have been considered there is potential for lower baseline noise levels at a particular site and thus a potential increase in effect. It is noted that the application of L_{Aeq},1hr to the assessment of night time construction noise is by no means universally accepted however it is the Council's preferred reference period for the assessment of the construction works against a L_{Aeq},1hr baseline for night-time working.</p>	N	RiverOak maintains its approach is sufficient.
	<p><u>B PEIR: Noise</u></p> <p>No baseline assessment of vibration has been conducted and is deemed not to be required given the absence of sources of baseline vibration. This approach is considered appropriate.</p>	N	RiverOak notes this comment.
	<p><u>PEIR: Noise</u></p>	N	RiverOak notes this comment.

	<p>The assessment of effects from aircraft and ground noise is considered to have been generally undertaken using an appropriate methodology. The review has identified a number of areas where clarification and/or additional analysis is required to be addressed within the ES.</p>		
	<p><u>PEIR: Noise</u></p> <p>The assessment does not make clear the direct and indirect effects of the development. This should be made clear at ES.</p>	N	RiverOak maintains its approach is sufficient.
	<p><u>PEIR: Noise</u></p> <p>The combined effects of construction (for those construction phases after opening), road and operational aircraft do not appear to be considered. Particularly of concern would be those combined night-time effects after opening arising from night-time construction activities. This should be addressed in the ES.</p>	N	RiverOak maintains its approach is sufficient.
	<p><u>PEIR: Noise</u></p> <p>There does not appear to be reference to cumulative effects with other major Proposed Developments in the area. Clarity is sought and this assessment should be included within the ES. The assessment of effects does not clearly demonstrate how the aims of Government noise policy have been met. This should be included in ES.</p>	Y	There is now a cumulative effects Chapter of the ES, Chapter 18 (document reference TR020002/APP/5.2-3).

	<p><u>PEIR: Noise</u></p> <p>Sleep disturbance caused by night flights is perhaps the most sensitive aspect of any airport operations at Manston, particularly where cargo operations are central to the case. The results presented at Table 12.25 indicate that at night that the number of dwellings exposed to noise levels >night-time SOAEL is 225 in year 20, an increase from zero in Year 2.</p>	N	RiverOak notes this comment.
	<p><u>PEIR: Noise</u></p> <p>The mitigation identified for this residual “significant effect” appears to be in the form of the “sound insulation grant scheme”. It is standard practice when addressing aim 1 (avoiding significant effects) to apply a noise insulation and compensation scheme. This scheme as proposed in the mitigation plan however is only a £4000 contribution towards the costs of insulation and ventilation. There is a question as to whether a “contribution” is adequate for “avoiding” significant effects as per aim 1 of the Government’s noise policy. Further, paragraph 12.9.45 indicates that the mitigation “will avoid or reduce significant effects at many receptors”. Noise insulation schemes of this nature only “avoid” significant effects where the noise insulation is actually installed at the property. It is considered unlikely</p>	N	This is in line with other airport noise insulation schemes.

	<p>that the cost of noise insulation and ventilation would be less than £4,000 and so this will then generally require a contribution from the homeowner. Consequently, take-up is generally low when a grant type scheme with a contribution to the costs only are provided - to drive take-up of the scheme full costs need to be provided alongside provision of acoustic glazing options. It is considered that this scheme would not provide adequate coverage to enable a claim that the significant effects from aircraft noise are avoided.</p>		
	<p><u>PEIR: Noise</u></p> <p>The aviation policy at Heathrow has more generous compensation package and restriction on night flights (11pm-7am). The Air Navigation Guidance 2017 sets LOAEL of 51dB LAeq16hr for daytime noise and 45dB LAeq8hr – so the proposed contours (50/40) are significantly ‘tighter’ but mitigation doesn’t apply until 63dB day and 55dB night to properties within the contours, which is significantly worse than proposed by Heathrow extension.</p>	<p>N</p>	<p>RiverOak has followed government guidance for the insulation scheme threshold.</p>
	<p><u>PEIR: Noise</u></p> <p>The proposed night flying restrictions presented in the Noise Mitigation Plan indicate that only the QC8 and 16 aircraft cannot operate between 11pm and 7am. As the PEIR points out, aircraft technology is improving and aircraft are getting quieter. Clarity should be sought on the extent to which this would</p>	<p>N</p>	<p>The Quota Count system itself incentivises quieter aircraft. Further details can be found in the Noise Mitigation Plan (document reference TR020002/APP/2.4).</p>

	<p>make a difference to minimising the effects of night flights. Consideration should be given to ways to incentivise the use of quieter aircraft types at night and/or how the noise limits and fines can be used in combination to act as an incentive.</p>		
	<p><u>PEIR: Noise</u></p> <p>The assessment identifies that there are no dwellings where there would be at least one additional awakening either at Year 2 or Year 20. It is not possible to verify this as there are no contours presented, however this seems unlikely given there are over 200 dwellings inside the night-time SOAEL in Year 20. The method for the calculation of awakenings is not apparent through the documentation – key considerations need to be understood to enable understanding of this result. This should be included within the ES.</p>	N	RiverOak maintains its approach is sufficient.
	<p><u>PEIR: Noise</u></p> <p>The assessment considers there is likely to be an even temporal distribution of flights across the night – i.e. 1 per hour. Clarity should be sought on the likelihood and reality of this happening in practice given the nature of the night-time operation being cargo only. This assumption may partially explain why there are no additional awakenings forecast - additional awakenings is a function of the magnitude of internal noise events, the number of the events and the time/frequency between events. It is therefore essential that clarification is provided</p>	N	RiverOak maintains its approach is sufficient.

	<p>on the proposed night flights schedule and this should be detailed and assessed within the ES.</p>		
	<p><u>PEIR: Noise</u></p> <p>The analysis indicates that the most effective means for reducing sleep disturbance is the preferential runway use proposal which reduces flights over Ramsgate. Clarity should be provided on the feasibility of this, if it is to be presented as a mitigation option (though it is recognised that this is a matter for airspace design so may not be relevant for the DCO).</p>	<p>Y</p>	<p>This is part of the Noise Mitigation Plan (document reference TR020002/APP/2.4).</p>
	<p><u>PEIR: Noise</u></p> <p>Notwithstanding the issues outlined, the number of movements within the night-time period should be limited to 8 in accordance with all environmental information produced, otherwise all work in the ES would not adequately assess the impact of the development. Therefore there should be no objection for this restriction to be stated as a DCO requirement.</p>	<p>N</p>	<p>RiverOak maintains its approach is sufficient.</p>
	<p><u>PEIR: Noise</u></p> <p>Seven schools have been identified as having a significant effect arising from the development (Paragraph 12.9.58 and Table 12.10). Table 12.26 presents the predicted aircraft noise levels for non-residential receptors including schools (as identified meeting the impact criteria). Paragraph 12.9.61 indicates that “noise</p>	<p>N</p>	<p>RiverOak maintains its approach is sufficient.</p>

	<p>sensitive schools... have been identified which are exposed to noise levels in excess of 60 dB LAeq,16hr”, however the noise levels in Table 12.26 do not support this statement, presenting no schools having noise levels greater than 58 dB LAeq,16hr, unless the magnitude of the change has resulted in this identification. Clarity should be provided on which criteria has identified significant effects for these schools.</p>		
	<p><u>PEIR: Noise</u></p> <p>In respect of the mitigation applied to schools where a significant effect has been identified. In Appendix 1, Section 3 of the noise mitigation plan the proposals for the Noise insulation scheme are set out. This section states that “The airport will provide reasonable levels of noise insulation and ventilation for schools and community buildings within the 60 dB LAeq (16 hour) day time contour.” The data presented in Table 12.26 would suggest that there are no schools that meet the eligibility criteria for the scheme – so whilst seven schools are identified with significant effects these would not qualify for the noise insulation scheme. The proposed noise insulation scheme for schools is considered insufficient to mitigate the significant effects that have been identified.</p>	<p>N</p>	<p>RiverOak maintains its approach is sufficient.</p>
	<p><u>PEIR: Noise</u></p> <p>Further details and revision of the noise insulation scheme for schools should be provided as part of</p>	<p>N</p>	<p>RiverOak maintains its approach is sufficient.</p>

	<p>the ES that demonstrate adequacy to address the identified effects. The scheme currently defines that the Proposed Development “will provide reasonable levels of noise insulation and ventilation”. There needs to be greater clarity on the approach to define reasonable and what criteria would be applied. A good starting point would be the application of noise insulation and ventilation to enable the requirements of BB93 to be met. A revised mitigation plan should be provided with greater detail on this scheme.</p>		
	<p><u>PEIR: Noise</u></p> <p>The noise contour plans show additional contours i.e. the extent of 57dB(LAeq16hr-daytime) contour as this is the threshold where the Aviation Policy Framework suggest there is the onset of significant community annoyance, as well as the 60dB contour (which had to be requested additionally by the Council for the consultation).</p>	N	RiverOak notes this comment.
	<p>The analysis indicates (para 12.9.53 and Table 12.25) that the number of dwellings exposed to daytime SOAEL increases from 48 to 115 between year 2 and 20. As with the night-time SOAEL point raised above, there is a question of adequacy of the proposed noise insulation scheme if this to be the primary means to “avoid” significant effects.</p>	N	RiverOak maintains its approach is sufficient.
	<p><u>PEIR: Noise</u></p>	N	RiverOak maintains its approach is sufficient.

	<p>The analysis indicates that the number of dwellings exposed to noise levels greater than LOAEL both daytime and night-time is likely to increase. Whilst it is understood that the number of movements is forecast to grow and hence the noise exposure footprint gets larger, and that that this is largely a matter of airspace design, some clarity of how the mitigation measures presented might address this to reduce the effects commensurate with the growth forecast is required to be provided. It is not clear how the mitigation measures reduce the effects over time. For example, as with night flights, there appear to be few incentives for operators to consider operating least noisy aircraft available and appropriate to the service.</p>		
	<p><u>PEIR: Noise</u></p> <p>Paragraph 12.9.45 refers to “embedded” mitigation from the mitigation plan as outlined in section 12.7. However, it is not clear which of those items in the mitigation plan would be considered embedded and which of them contribution to reducing noise levels – not all of them do, e.g. the noise and track monitoring system is a management tool, whilst this is an important tool for reporting it would not necessarily reduce noise. Further it is not clear which ones have been considered in the development of the dwelling counts exposed to SOAEL and LOAEL values.</p>	<p>N</p>	<p>RiverOak maintains its approach is sufficient.</p>

	<p>The evaluation of airport mitigation options presented in Appendix 12.3 is considered appropriate.</p>	N	RiverOak notes this comment.
	<p><u>Noise Mitigation Plan:</u></p> <p>In addition to the specific effects comments raised above with respect to night flights and schools the following points are made, that should be addressed within the ES:</p>	N	RiverOak notes this comment.
	<p><u>Noise Mitigation Plan:</u></p> <p>It is considered that the mitigation plan as currently presented does not provide sufficient information as to how the items enable the aims of noise policy to be achieved and which of the aims of noise policy each addresses. There should also be an evaluation of the mitigation elements to demonstrate how they each meet the aims of noise policy to avoid significant effects; mitigate and minimise adverse effects; and improve the effects on health and quality of life. The evaluation should demonstrate why they are considered appropriate.</p>	N	It is not a matter for the Noise Mitigation Plan to explain why it achieves the aims of policies, that is for Chapter 12 of the ES (document reference TR020002/APP/5.2-2).
	<p><u>Noise Mitigation Plan:</u></p> <p>Further, the NMP indicates that the requirements of the ICAO Balanced Approach have been considered in the development of the mitigation but it is not clear how each item relates to the aspects of the ICAO Balanced Approach.</p>	N	RiverOak maintains its approach is sufficient.

	<p><u>Noise Mitigation Plan:</u></p> <p>The assessment of effects clearly shows that the effects worsen over time as movements grow and so there is no mechanism built in to the mitigation to apply some measure of control over the growth of adverse effects as the airport grows, i.e. there is an implication that worsening effects is a consequence of growth. This is a limited view and the mitigation plan should present mechanisms to incentivise the airport and or its operators to improve performance and reduce these effects over time, in particular where there are significant effects identified e.g. from night flights and to schools.</p>	N	RiverOak maintains its approach is sufficient.
	<p><u>Noise Mitigation Plan:</u></p> <p>The mitigation plan presents some night flight restrictions with annual quota limits applied to the core night quota period (2300 to 06:00 in this case) of 4000, with an additional quota of 2000 for flights in the shoulder period (defined as 06:00 to 07:00 for this airport) – that is a total of 6,000. The analysis indicates a maximum of 8 flights per night and so an overall average Quota Count per movement of 2. However, there is no restriction on the number of movements in this period, so there could be many more movements by aircraft at the lower Quota Count range, or fewer at the higher end. This Quota Count approach can be an effective mechanism for managing the effects of night flights, especially when considered in conjunction</p>	Y	The Quota Count in the Noise Mitigation Plan (document reference TR020002/APP/2.4) has been reduced to 3028.

	<p>with the noise insulation scheme. However, given the current limitations on the information provided, it is unclear how effective this mechanism will be until all matters raised have been addressed.</p>		
	<p><u>Noise Mitigation Plan:</u></p> <p>It is not clear what the securing mechanisms are for these mitigation items, clarity should be presented at ES on how these items will be secured.</p>	<p>N</p>	<p>They are secured through requirement 9 of the DCO (document TR020002/APP/2.1) and it will therefore be a criminal offence not to secure them.</p>
	<p><u>Noise Mitigation Plan:</u></p> <p>Paragraph 1.4 includes planes “scheduled to land” within the night-time period, but omits those aircraft that land during the night-time period when the scheduled landing time has been altered.</p>	<p>N</p>	<p>RiverOak maintains its approach is sufficient.</p>
	<p><u>Noise Mitigation Plan:</u></p> <p>Appendix 12.3 presents an appraisal of the airport mitigation options for displaced thresholds and alternative glideslopes. This analysis indicates that these potentially offer relatively small benefits over the standard positioning and slopes and so they have not been adopted. Limitations in the way in which these have been assessed mask the benefits for those that would benefit (in particular people in Ramsgate). This may be acceptable for the early years of operation where the impacts have been demonstrated to be much smaller it is, in later years the impacts have been shown to worsen, with no mitigation present to reduce noise levels as the</p>	<p>N</p>	<p>RiverOak maintains its approach is sufficient.</p>

	<p>airport grows other than assumptions that technology will deliver. It is therefore considered that in the ES further analysis should be presented to demonstrate that without these (and potentially other) mitigation elements that all the aims of noise policy can be met; how these options could be deployed over time to offset some of the worsening of effects that accompanies the growth of the airport; and to demonstrate how significant effects have been avoided as far as possible before the application of a noise insulation scheme.</p>		
	<p><u>Noise Mitigation Plan:</u> The adoption of continuous descent approach does not appear in the list of mitigation elements. Evaluation of this should be provided within the ES.</p>	N	RiverOak maintains its approach is sufficient.
	<p><u>Noise Mitigation Plan:</u> Measures should be developed, considered, assessed and analysed that could be implemented over time as the airport grows to offset the increased effects (increased glideslope may well be one of these).</p>	N	The Noise Mitigation Plan (document reference TR020002/APP/2.4) is intended to address the effects of noise from airport when at its full operating year.
	<p><u>Noise Mitigation Plan:</u> An analysis and evaluation of the noise limits and fine proposals should be undertaken to support the mitigation plan so that some understanding can be provided of how much of a deterrent the proposals may be. This should be detailed within the ES.</p>	N	RiverOak maintains its approach is sufficient.

	<p><u>Noise Mitigation Plan:</u></p> <p>It is important to emphasise that residents will not have recourse to complaint to the Council Environmental Health team to investigate complaints of aircraft noise because Statutory Nuisance does not apply to aviation which is specifically exempted hence why it is vital all residents affected are made aware in plain English of the implications of the potential noise.</p>	N	RiverOak notes this comment.
	<p><u>Noise Mitigation Plan:</u></p> <p>There are a number of different noise metrics units used within the noise mitigation plan including EPNdB and LAMax that are used to describe noise levels from individual aircraft. These could be considered complex for the layperson to understand and it is recommended that a non-technical version of the mitigation plan is prepared to accompany the ES.</p>	N	The Noise Mitigation Plan (document reference TR020002/APP/2.4) has been made deliberately precise, necessitating the use of technical terms.
	<p><u>Noise Mitigation Plan:</u></p> <p>The description of the proposals for night flight restrictions is long and complex – the tables of aircraft types are very lengthy – consideration should be given to providing a simplified explanation (perhaps with a more technical supporting note). This should be simplified to enable better understanding. A time period of application and review should also be applied.</p>	N	See above.

	<p><u>Noise Mitigation Plan:</u></p> <p>The justification for the number and location of noise monitors is not provided. The proposals for the noise monitoring terminals indicate a position of 6.5km from start of roll. The reason for this positioning should be made clear. It is assumed that this is because this is the same approach as that taken at other airports where noise limits are in place as it relates to the measurement position used for determining take off noise in the ICAO aircraft noise certification process. The potential locations should be highlighted on a map for ease of understanding. Whilst this approach is appropriate as a minimum, there are other options for citing noise monitoring terminals. For example, noise monitors could additionally be cited in communities where significant effects have been identified – this would be especially helpful to track noise levels over time, especially when this has been identified as worsening. This would provide transparency. Greater justification should be provided in the ES on the noise monitoring arrangements including reasons for rejection of alternative/supplementary community based approaches and who will monitor the data and how will this be reported.</p>	N	RiverOak maintains its approach is sufficient.
	<p>World Health Organisation (WHO) and the former PPG24 indicate that exceeding an LAMax of 45dB can cause sleep disturbance inside bedrooms at night or 60dBLAMax outside an open bedroom</p>	N	RiverOak maintains its approach is sufficient.

	<p>windows. This is a significant concern and the NMP takes no account of this maximum noise level at night other than to penalise aircraft who breach this at a considerable distance from the runway; 82dB at the reference point 6.5km away is going to be significantly louder over Ramsgate and the intervening land under the flight path. The WHO nighttime noise thresholds recommend an even lower L_{Amax} of 45 dB given that it is reasonable for people to have their windows open. By year 20 approx. 10,139 dwellings will be exposed to noise levels in excess of 80dB L_{ASMax}. Greater justification should be provided in the ES to clarify what “in excess of” means, and how the NMP would mitigate this impact.</p>		
	<p><u>Noise Mitigation Plan:</u></p> <p>There are no time-based incentives, performance targets, or review periods identified so it is not clear how the mitigation plan will be reviewed over time for adequacy and effectiveness (including the financial penalties to be imposed) and to incentivise the development and implementation of further mitigation (e.g. new technology) to be introduced to reduce effects over time.</p>	N	RiverOak maintains its approach is sufficient.
	<p>From a construction perspective the following comments are made:</p>	N	RiverOak maintains its approach is sufficient.
	<p><u>PEIR: Noise</u></p>	N	Cumulative effects are considered in Chapter 18 of the ES (document reference TR020002/APP/5.2-3).

	<p>The overlap of activities within a phase may not have been presented as only the construction activity noise levels are given and not the overlap of activities that may occur temporally as such further significant construction noise effects may emerge. The effect of overlapping activities may be greater than the effect for the individual activities. Consideration of cumulative impacts needs to be included within the assessment contained within the ES.</p>		
	<p><u>PEIR: Noise</u></p> <p>The construction vibration concludes that at Spitfire Way will exceed the SOAEL for construction vibration for works lasting more than one month and states that the potential significant adverse effect from construction vibration will be managed by managing the amplitude at which the compactor operates. It is confirmed that potential significant adverse vibration effects can be avoided through the CEMP specifying requirements around the use of the of vibratory compaction equipment.</p>	N	RiverOak notes this comment.
	<p><u>PEIR: Noise</u></p> <p>Paragraph 12.9.25 sets out the noise mitigation plan associated with construction activities. The approach set out is considered reasonable and follows standard practice with other major construction Proposed Developments. The s61 application process will ensures further opportunity for TDC to ensure that effects of noise and vibration</p>	N	RiverOak notes this comment.

	<p>are mitigated appropriately to enable significant effects to be avoided as indicated in Paragraph 12.9.26.</p>		
	<p><u>PEIR: Noise</u></p> <p><i>Conclusion of preliminary significance</i></p> <p>For aircraft and ground noise the PEIR identifies areas where there are likely significant effects for residential receptors and schools. In particular night time effects are identified and these worsen over time. These results are considered to be sufficiently robust given the stage of the process. However, the implications of noise level change for identifying significant effects have not been assessed for residential receptors and this could lead to effects being missed.</p>	<p>N</p>	<p>RiverOak notes this comment.</p>
	<p><u>PEIR: Noise</u></p> <p><i>Conclusion of preliminary significance</i></p> <p>It is not clear how effective the mitigation proposed will be and how this manages the worsening of exposure over time. Specific points have been raised in section 4.5 of this review. It is expected that greater clarity should be provided in the ES and that the airspace design will have evolved further (though not yet finalised) to provide greater certainty.</p>	<p>N</p>	<p>RiverOak maintains its approach is sufficient.</p>
	<p><u>PEIR: Noise</u></p>	<p>N</p>	<p>RiverOak notes this comment.</p>

	<p>From a construction assessment perspective:</p> <p>The summary of significant effect details for construction noise there is a minor/moderate temporary effect on the community of Minster with minor/moderate/sleep disturbance at 14 dwellings at Bell Davies Drive and Spitfire Way.</p>		
	<p><u>PEIR: Noise</u></p> <p>From a construction assessment perspective:</p> <p>With consideration of the overlap of construction activities and the other points raised above there may (or may not) be further significant effects or an extension of the duration of significant effects.</p>	N	RiverOak maintains its approach is sufficient.
	<p><u>PEIR: Noise</u></p> <p>Combined effects are not presented.</p>	N	RiverOak maintains its approach is sufficient.
	<p><i>Non-technical summary (NTS)</i></p> <p>The NTS presents an overview of the significant effects from aircraft and ground noise and where they may arise for residential receptors. Whilst indicating that the effects on schools have been considered, it does not present the number of schools where a significant effect has been identified and how these are to be addressed. Whilst the NTS presents the number of dwellings with significant effects in Year 20, it does not indicate that the effects worsen from Year 2</p>	N	RiverOak maintains its approach is sufficient.

	through to Year 20, nor how the mitigation plan will address this.		
	<p><i>Non-technical summary (NTS)</i></p> <p>The NTS does not discuss the implications of the noise mitigation plan, other than the noise insulation scheme for residential dwellings. The NTS goes on to say that properties exposed to significant noise levels (i.e. greater than SOAEL) that they “qualify for noise insulation under the proposed noise insulation scheme. The noise insulation scheme will reduce noise inside all dwellings such that it does not reach a level where it will significantly affect residents” – this is a statement that is not used elsewhere and if part of the scheme should form part of the description of the scheme. There is, as previously mentioned, a question to be asked as to whether a scheme that only provides a financial contribution, not the products, not the suppliers, nor an assessment of improvement can be deemed adequate to meeting the “avoid” significant adverse effects noise policy aim and whether it supports this statement in the NTS.</p>	N	RiverOak maintains its approach is sufficient.
	<p><i>Non-technical summary (NTS)</i></p> <p>The NTS provides the summary below with regards to construction noise and this is considered an adequate and accurate summary of the Chapter 12 assessment.</p>	N	RiverOak notes this comment.

	<p><u>PEIR: Air Quality</u></p> <p><i>Scope of the assessment</i></p> <p>An assessment of odour has been carried out in accordance with the Institute of Air Quality Management Guidance and is presented in an Appendix 6.4. It identifies the fuel farm as a highly significant source of odour and recommends that mitigation measures, such as vapour recovery or floating roof design, should be applied. These measures should be demonstrated that there are sufficient to mitigate the impacts. Furthermore, the results of the odour assessment should be referenced within Chapter 6 including conclusions within Table 6.40.</p>	N	RiverOak maintains its approach is sufficient.
	<p><u>PEIR: Air Quality</u></p> <p><i>Scope of the assessment</i></p> <p>The assessment found that the significance of odours arising from aircraft operations were uncertain. It is appreciated that there are inherent difficulties in estimating odours from airports before they start operating, however, the Proposed Development should seek to quantify the impacts further and propose mitigation if necessary.</p>	N	RiverOak maintains its approach is sufficient.
	<p><u>PEIR: Air Quality</u></p> <p>We consider the scope of the assessment to be appropriate. It addresses the key impacts at</p>	N	RiverOak notes this comment.

	relevant locations and assesses these for appropriate years.		
	<p><u>PEIR: Air Quality</u></p> <p>The air quality Chapter provides adequate responses to comments raised during consultation with one exception. This being our previous comment that an emissions mitigation assessment must be provided in accordance with TDC Air Quality Technical Planning guidance 2016.</p>	N	RiverOak notes this comment.
	<p><u>PEIR: Air Quality</u></p> <p>Section 6.13 of PEIR only sets out a monetisation of air quality effects and the only mitigation assessed is the upgrading of construction plant to meet Stage IV emission standards. It is therefore considered that the PEIR does not fulfil the requirements of TDC's Air Quality Technical Planning Guidance (2016).</p>	N	RiverOak maintains its approach is sufficient.
	<p><u>PEIR: Air Quality</u></p> <p><i>Assessment methodology</i></p> <p>We consider the data gathering and assessment methodology to be appropriate and that the assessment has generally been carried out in accordance with good practice, and the results were supported by the evidence.</p>	N	RiverOak notes this comment.
	<u>PEIR: Air Quality</u>	N	RiverOak notes this comment.

	<p>The assessment used appropriate legislation, policy and guidance. The methods for determining significance were clearly identified and are considered appropriate.</p>		
	<p><u>PEIR: Air Quality</u></p> <p>The exceptions to this are set out below:</p> <p>Fugitive dust emissions were not explicitly assessed. It is proposed that these will be addressed via the proposed Dust Management Plan (DMP). However, this PEIR should have included an evaluation using the relevant guidance, to identify potentially significant impacts and appropriate mitigation. Such assessment should be included within the ES.</p>	N	RiverOak maintains its approach is sufficient.
	<p><u>PEIR: Air Quality</u></p> <p>The use of ADMS to assess aircraft sources does not account for aircraft specific plume characteristics. The use of an aircraft specific model such as ADMS-airport would have been preferable. However, the use of ADMS is likely to have overestimated rather than underestimated the impacts.</p>	N	RiverOak maintains its approach is sufficient.
	<p><u>PEIR: Air Quality</u></p> <p>The use of transects of receptors for the roads modelling is unclear and not a standard approach. This has led to the exclusion of the road traffic contributions from the contour plots.</p>	N	RiverOak maintains its approach is sufficient.

	<p><u>PEIR: Air Quality</u></p> <p><i>Baseline</i></p> <p>We consider the baseline data and its sources to be appropriate and adequate to enable the identification of likely significant effects.</p>	N	RiverOak notes this comment.
	<p><u>PEIR: Air Quality</u></p> <p>The future baseline has been assumed to be the same as the current baseline. This is considered a conservative assumption.</p>	N	RiverOak notes this comment.
	<p><u>PEIR: Air Quality</u></p> <p><i>Assessment of effects</i></p> <p>The assessment identified the likely significant environmental effects for all relevant operational phases. However, demolition and construction impacts have not been evaluated at this stage. Such assessment should be sought to be included in the ES.</p>	N	RiverOak maintains its approach is sufficient.
	<p><u>PEIR: Air Quality</u></p> <p>The environmental effects have generally been assessed using an appropriate assessment methodology. However, the use of transects of receptors for the roads modelling is unclear and not a standard approach. This has led to the exclusion of the road traffic contributions from the contour plots.</p>	N	RiverOak maintains its approach is sufficient.

	<p><u>PEIR: Air Quality</u></p> <p>It is considered that the assessment addresses the relevant types of effect associated the development.</p>	N	RiverOak notes this comment.
	<p><u>PEIR: Air Quality</u></p> <p>The assessment has considered the cumulative effects with other existing and/or approved Proposed Developments. It identified residential developments and included the additional road traffic they are expected to generate in the traffic model. However, no details of how this was done are given and further details on this approach are required to assess the robustness of the conclusions.</p>	N	RiverOak maintains its approach is sufficient.
	<p><u>PEIR: Air Quality</u></p> <p><i>Conclusions of preliminary significance</i></p> <p>The conclusions of the assessment are generally considered appropriate and robust, and the significance of the effects have been identified.</p>	N	RiverOak notes this comment.
	<p><u>PEIR: Air Quality</u></p> <p>The assessment found that the impact of the Proposed Development on annual mean NO2 concentrations was slight in St Lawrence where the background is very high due to existing road traffic. It proposed mitigation measures (construction plant to meet Stage IV emission standards) for year</p>	N	RiverOak maintains its approach is sufficient.

	<p>2. For years 6 and 20 it again found a slight impact in St Lawrence, but proposed no mitigation. For year 20 the assessment it was expected that measures to reduce road vehicle emissions over the next twenty years would lead to the airport impact being classed as negligible, but these reductions have not fed through to the assumed background concentrations, so it is not possible to verify this conclusion.</p>		
	<p><u>PEIR: Air Quality</u></p> <p>St Lawrence currently fails air quality objectives and the Council's draft policy will not permit worsening of air quality where levels already exceed legally binding limits. Therefore, the Proposed Development needs to either demonstrate that the impact in St Lawrence is negligible, or propose alternative mitigation to offset the impact in St Lawrence (e.g. possible junction improvements to reduce existing traffic related NO2).</p>	N	RiverOak maintains its approach is sufficient.
	<p><u>PEIR: Air Quality</u></p> <p>The monetisation of air quality effects (provided in section 6.13 of PEIR) could be used as a basis to calculate a contribution for Emissions mitigation payments to be agreed between the applicant and the Council.</p>	N	RiverOak notes this comment.
	<p><u>PEIR: Air Quality</u></p>	N	RiverOak notes this comment.

	<p>Moderate impacts at a small number of properties close to the airport are identified, although it is recognised that currently NO2 concentrations are sufficiently below legal limits.</p>		
	<p><u>PEIR: Air Quality</u></p> <p>The small, but not insignificant, impact on the annual mean NOx objective at the major ecological sites means that it cannot be screened from further assessment. The Biodiversity Chapter includes further assessment of the ecological sites. It is noted that an appropriate HRA will be needed for the Proposed Development. This will need to consider the impacts on European habitat sites of the Proposed Development itself, and in-combination with other plans and Proposed Developments.</p>	<p>N</p>	<p>An HRA has been included (Appendix 7.1 to the ES, document reference TR020002/APP/5.2-6)</p>
	<p><u>PEIR: Land Quality</u></p> <p><i>Scope of the assessment</i></p> <p>All consultees make comment on the requirement for an intrusive site investigation, and the importance of the CEMP as a tool for managing risks due to land quality.</p>	<p>N</p>	<p>RiverOak notes this comment.</p>
	<p><u>PEIR: Land Quality</u></p> <p>The Land Quality Assessment undertaken and reported in the PEIR 2018 comprised: a desk study, including review of existing desk study reports and two intrusive investigation reports</p>	<p>N</p>	<p>RiverOak notes this comment.</p>

	<p>(each for a small area of the site); a site walkover; identification of information gaps; and a geotechnical assessment. The intrusive investigations that exist cover a very small portion of the site, and there is no intrusive site investigation data for most of the site.</p>		
	<p><u>PEIR: Land Quality</u> <i>Assessment methodology</i></p> <p>There is no allowance in the scheme of definitions for 'harm' such as allergic reaction, dermatitis, skin irritation, headache or nausea that might arise from exposure to contaminated soils, but which does not result in significant harm.</p>	N	RiverOak maintains its approach is sufficient.
	<p><u>PEIR: Land Quality</u></p> <p>An assessment of effects is carried out on each receptor, and a summary of significance of effects is provided in Table 10.14. The assessment would benefit from a table showing the sensitivity of each receptor, which is currently buried in the text.</p>	N	RiverOak maintains its approach is sufficient.
	<p><u>PEIR: Land Quality</u></p> <p>Table 10.13 provides the significance criteria, which include a site sensitivity of very high. This has not been defined – receptor sensitivities as set out in Table 10.11 are defined for high, medium and low. A definition of 'very high' sensitivity should be included in the assessment. The matrix allows for two categories of significance, these being</p>	N	RiverOak maintains its approach is sufficient.

	<p>'significant' and 'not significant'. Only three of the matrix squares results in a significant effect, which is not consistent with other Chapters (e.g. Chapter 12, Noise). Further justification for the significance criteria is required.</p>		
	<p><u>PEIR: Land Quality</u></p> <p>The sequencing of the assessment methodology is confusing and potentially misleading for the reader. Potential environmental effects (on groups of receptors) and Mitigation Measures are discussed in Table 10.8, before receptors have been defined. Receptors are then introduced in Table 10.10. Environmental effects on receptors are then assessed in Section 10.8, variably assuming that Environmental (Mitigation) Measures are already in place. It is difficult for the reader to map back to Table 10.8 from section 10.8, as the receptor groupings are not consistent.</p>	N	RiverOak maintains its approach is sufficient.
	<p><u>PEIR: Land Quality</u></p> <p>In consequence, it is difficult to judge whether the proposed Environmental (Mitigation) Measures are appropriate, as they are described prior to a discussion of effects. The assessment would be improved by removing Table 10.8 and including a preliminary assessment of environmental effects, pre-mitigation, identification of Environmental (Mitigation) Measures, followed by a revised assessment of the residual environmental effects and environmental significance in Table 10.14.</p>	N	RiverOak maintains its approach is sufficient.

	<p><u>PEIR: Land Quality</u></p> <p><i>Baseline</i></p> <p>A Phase 1 Geoenvironmental Desk Study is presented in Appendix 10.1, from which much of the baseline section of the assessment is derived. Reports are cited on two phases of site investigation a tank farm (the Jentex Tank Farm), located directly southeast of the airfield on Canterbury Road. A site investigation report also exists for the area of the radar mast in the north western area of the site. There are no intrusive site investigation data for the majority of the development site. Baseline soil and groundwater quality is therefore unknown. The conclusions of the Phase 1 geoenvironmental assessment (10.4.49) do not include radiological sources, although these are identified in the preceding text. Historic and recent aircraft breaking activities have not been included in the baseline assessment, although these have been raised by the Council as requiring consideration.</p>	N	RiverOak notes this comment.
	<p><u>PEIR: Land Quality</u></p> <p>The site is underlain by the Principal Chalk aquifer, overlain in places by quaternary head deposits. The baseline describes the site being underlain by quaternary deposits comprising clay and silt, whereas mapping shows these to be absent over much of the site. Clarification of the extent of superficial cover overlying the Chalk is required.</p>	N	RiverOak maintains its approach is sufficient.

	<p><u>PEIR: Land Quality</u></p> <p>The site lies entirely within the catchment of the Source Protection Zone (SPZ) for the Lord of the Manor groundwater abstraction. This abstraction, which is a significant groundwater resource, relies substantially on an adit in the Chalk which runs below the existing runway, approximately 50m below the site. The runway and part of the site are in SPZ Zone 1, and the south-central and south-east part of the site is in SPZ Zone 2. The Chalk aquifer derives its permeability from secondary permeability (fracture flow) and is therefore highly susceptible to pollution due to rapid transport of dissolved and particulate contaminants through fracture networks. The geoenvironmental report (Appendix 10.1) is considered to understate the sensitivity of coastal water (moderate to high) which should be high due to international designations, and the ecological sensitivity, which does not include the ecological importance of Pegwell Bay.</p>	N	RiverOak maintains its approach is sufficient.
	<p><u>PEIR: Land Quality</u></p> <p>The baseline description of groundwater is not consistent with the Hydrogeological Impact Assessment (HIA) presented in Appendix 8.1, and would be improved by using this document as a source. Groundwater flow directions are inconsistent between the two documents. Baseline groundwater quality is not described in Chapter 10,</p>	N	RiverOak maintains its approach is sufficient.

	<p>however Appendix 8.1 states that the local groundwater quality is impacted by nitrates, and organic compounds including TCE and carbon tetrachloride, both chlorinated solvents that are thought to have been in use at the airfield (see 3.3.4.1 in HIA, App 8.1). Baseline groundwater quality should be included in the baseline, and flow and quality descriptions should be consistent between Chapters 8 and 10.</p>		
	<p><u>PEIR: Land Quality</u></p> <p>The baseline does not describe the likely distribution of soil or groundwater contamination at the site, as there has been little site investigation undertaken across the site. It is considered that the identification of significant effects is hampered by a lack of intrusive site investigation data, as baseline soil and groundwater quality is not known.</p>	N	RiverOak maintains its approach is sufficient.
	<p><u>PEIR: Land Quality</u></p> <p>The assessment proposes that the current baseline be used as a future baseline, as ‘in the absence of the Proposed Development, there are no known factors that are expected to affect the current baseline conditions’. Climate change is anticipated to affect rainfall infiltration rates and groundwater levels, both of which are likely to have a measurable effect on contaminant mobility and migration. The ES should consider the effects of climate change on the estimate of the significance of effects, and on the likely Environmental</p>	N	RiverOak maintains its approach is sufficient.

	Measures that might be required to mitigate environmental effects.		
	<p><u>PEIR: Land Quality</u></p> <p><i>Assessment of effects</i></p> <p>The Lord of the Manor Public Water Supply (PWS) is not identified as a separate receptor. This is an omission and should be included, due to the presence of an adit which feeds the PWS directly below the runway. Specific measures may be needed to protect this receptor that would not apply to the wider aquifer.</p>	N	RiverOak maintains its approach is sufficient.
	<p><u>PEIR: Land Quality</u></p> <p>The effects are considered in three phases; the construction phase, operational phase, and the decommissioning phase. It is not recognised that part of the airport will be operational whilst further phases of construction are undertaken, which has particular implications for protection of human health.</p>	N	RiverOak maintains its approach is sufficient.
	<p><u>PEIR: Land Quality</u></p> <p>Combined effects are considered, but none are identified with regard to any of the receptors. The combined effects of flooding and land quality should be considered, as should the combined effects of potentially contaminated groundwater baseflow and surface run-off to drains and Pegwell Bay via the site discharge. Chapter 8 and Chapter</p>	N	RiverOak maintains its approach is sufficient.

	<p>10 have many areas of overlap, and the combined effects should be stated explicitly. Any combined effects with Chapter 15 (Public Health) should also be identified.</p>		
	<p><u>PEIR: Land Quality</u></p> <p>Cumulative effects are not discussed; Chapter 18 states that cumulative effects will be assessed in the ES but not as part of the PEIR. Environmental effects are not described explicitly in terms of direct, indirect, secondary, transboundary, short-term, medium-term, long-term, permanent or temporary, positive or negative effects.</p>	<p>N</p>	<p>Noted; there is now a cumulative effects Chapter (Chapter 18 – document reference TR020002/APP/5.2-3).</p>
	<p><u>PEIR: Land Quality</u></p> <p>Effects on humans:</p> <p>The potential presence of radiological material is not acknowledged. Solvents may include chlorinated solvents, which are not mentioned specifically. The potential for asbestos to be present in soils (possibly in deliberate disposal pits of significant volume) has not been recognised.</p>	<p>N</p>	<p>RiverOak maintains its approach is sufficient.</p>
	<p><u>PEIR: Land Quality</u></p> <p>Nowhere does it explicitly state that there is a potential risk to future site users arising from in-situ soil and groundwater contamination, and that these will be mitigated through site investigation, risk assessment, remediation and verification to</p>	<p>N</p>	<p>RiverOak maintains its approach is sufficient.</p>

	ensure that the site is suitable for use with respect to protection of human health.		
	<p><u>PEIR: Land Quality</u></p> <p>The assessment of effects assumes that mitigating measures can be found and implemented via a CEMP, however there is insufficient baseline data to outline what those mitigating measures might be, how long they might take, or where they may be required. Potential impacts of the measures on the phasing and design of the scheme are therefore unknown.</p>	N	RiverOak maintains its approach is sufficient.
	<p><u>PEIR: Land Quality</u></p> <p>The assessment of the operational phase does not include protection of site users due to ongoing construction i.e. managing those phases of construction that occur when the airport is open to the public. Environmental measures may be required to protect site users of the operational part of the airport from construction effects.</p>	N	RiverOak maintains its approach is sufficient.
	<p><u>PEIR: Land Quality</u></p> <p>Crucially, for this Proposed Development which has the potential to impact a significant public water supply, the human health effects of pollution of the water supply have not been assessed.</p>	N	RiverOak maintains its approach is sufficient.
	<u>PEIR: Land Quality</u>	N	RiverOak maintains its approach is sufficient.

	<p>The assessment of the effect on human health of the permeation of drinking water supply pipes with contaminants has not been assessed.</p>		
	<p><u>PEIR: Land Quality</u></p> <p>Effects on groundwater (Chalk Aquifer):</p> <p>The effects of construction (including site investigations) on turbidity in the Lord of the Manor PWS have not been considered, nor have Environmental Methods been proposed to mitigate against this risk. The effects of the day to day operation of the airport and the potential for landing large aircraft on the runway to cause turbidity or instability in the adit have not been considered.</p>	N	RiverOak maintains its approach is sufficient.
	<p><u>PEIR: Land Quality</u></p> <p>Foundation construction, particularly piling, has the potential to directly impact the Lord of the Manor PWS by creating pathways for contaminant transport. Foundation design should be informed by geotechnical and land quality investigations, and should be agreed with the EA. Approval of these designs by the EA should be a pre-commencement requirement of the DCO.</p>	Y	Requirement 15 of the draft DCO (document reference TR020002/APP/2.1) requires piling methods to be agreed with the EA.
	<p><u>PEIR: Land Quality</u></p> <p>Soil and groundwater investigation and remediation activities have the potential to</p>	N	RiverOak maintains its approach is sufficient.

	adversely impact the aquifer and the PWS, and these have not been considered.		
	<p><u>PEIR: Land Quality</u></p> <p>The operational phase assessment does not include the effects of general spillages of hazardous materials across the estate, fire-fighting activities, the use of pesticides, or de-icing activities on the aquifer or PWS.</p>	N	RiverOak maintains its approach is sufficient.
	<p><u>PEIR: Land Quality</u></p> <p>The report states that 'A combination of good practice and site-specific measures for the protection of the Chalk aquifer, in combination with further consultation with the EA and with Southern Water, will result in a negligible magnitude of effect'.</p>	N	RiverOak notes this comment.
	<p><u>PEIR: Land Quality</u></p> <p>It is possible that standard approaches to groundwater protection will not be sufficient to protect the PWS, due to its location only 50m below the runway (bearing in mind that the Chalk is recharged via fractures and fissures that allow rapid transport of contaminants and suspended solids) on a site that is likely to be impacted by fuels and chlorinated solvents, and potentially by radiological material. Site investigations are required to establish the nature and spatial extent of contamination at the site. It is equally considered possible that the results of site</p>	N	RiverOak maintains its approach is sufficient.

	<p>investigations and risk assessment will result in changes to the phasing and/or design of the scheme, in order to accommodate remediation activities or to provide mitigating features through redesign. For these reasons, it is proposed that some exploratory intrusive site investigation is undertaken prior to the DCO submission, to provide further information on sources of contamination. The significance of effects can then be judged with greater certainty, and mitigating measures identified with greater confidence.</p>		
	<p><u>PEIR: Land Quality</u> The effects of a plane crash on the Chalk principal aquifer and PWS are not considered and should be included in the assessment.</p>	Y	<p>There is now a major accidents and disasters – Chapter 17 (document reference TR020002/APP/5.2-3).</p>
	<p><u>PEIR: Land Quality</u> Effects on Coastal Waters: There is the potential to affect coastal waters as it is understood that discharge from the site will be via an existing pipe that discharges to Pegwell Bay. There is ambiguity regarding the sensitivity of the receptor. Coastal waters are stated to have high sensitivity (10.10.2), but Pegwell Bay is stated to have moderate sensitivity (10.10.3). The national ecological designations at Pegwell Bay indicate that it is a high sensitivity receptor and should be considered as such.</p>	N	<p>RiverOak maintains its approach is sufficient.</p>

	<p><u>PEIR: Land Quality</u></p> <p>Paragraph 10.10.10 describes how water treatment will take place on site in attenuation ponds, and water will only be pumped to the discharge pipe from these ponds once appropriate water quality standards are reached. The potential for leakage from these ponds and impact on groundwater quality has not been assessed.</p>	N	RiverOak maintains its approach is sufficient.
	<p><u>PEIR: Land Quality</u></p> <p>Effects on Soils:</p> <p>The effects of a plane crash on soil quality have not been considered and should be included in the assessment. The effects of de-icing activities should also be included in the assessment.</p>	N	RiverOak maintains its approach is sufficient and refers TDC to Chapter 17 of the ES (document reference TR020002/APP/5.2-3).
	<p><u>PEIR: Land Quality</u></p> <p>Effects on building and services:</p> <p>It is accepted that the proposed measures if appropriately implemented can result in a not significant effect on buildings and services.</p>	N	RiverOak notes this comment.
	<p><u>PEIR: Land Quality</u></p> <p><i>Conclusions of preliminary significance</i></p> <p>The conclusions of preliminary significance are presented in Table 10.14. The conclusions are that none of the Environmental Effects identified in the</p>	N	RiverOak notes this comment.

	assessment are significant, if the identified Environmental Measures are implemented.		
	<p><u>PEIR: Land Quality</u></p> <p>It is not easy to link the information contained in Tables 10.8 and 10.9, which contains the Environmental Measures, and Table 10.14, nor to link these tables to the discussions in Sections 10.8 – 10.12. It is suggested that the sequencing of the report is altered in the DCO submission to allow the reader to be led from receptors to effects to environmental measures to preliminary significance. As it stands, the report does not allow the reader to readily assess whether all the issues that have been raised through the Chapter are adequately addressed.</p>	N	RiverOak maintains its approach is sufficient.
	<p><u>PEIR: Land Quality</u></p> <p>A weakness of the conclusions is that many of the Environmental Measures are yet undefined. It is proposed to develop a CEMP which will detail these measures, with a draft plan to be submitted with the DCO application, and a full version to be developed 'if necessary prior to commencement of works'.</p>	N	A CEMP is included in the application (Appendix 3.2 of the ES (document reference TR020002/APP/5.2-6).
	<p><u>PEIR: Land Quality</u></p> <p>The design of mitigation measures and hence the detail of the CEMP must be informed by a thorough intrusive site investigation and risk assessment. It</p>	N	RiverOak notes this comment.

	is proposed that 'the need to complete an intrusive investigation will be secured through the DCO'.		
	<p><u>PEIR: Land Quality</u></p> <p>It is considered that the former land use is likely to have resulted in potentially significant land quality impacts, particularly in the runway area where FIDO was carried out and runway foams were used. The use of chlorinated solvents and radiological materials are also potentially significant issues that may be complex to deal with. The adit under the runway which feeds the Lord of the Manor PWS is a highly sensitive receptor; protecting this receptor may require rephrasing or redesign of the scheme once the distribution of contamination is better understood. It is considered that the CEMP that will be submitted to with the DCO application should be supported by some intrusive site investigation and assessment, even if the level of investigation is exploratory. It is considered that further information is required in order to support the conclusions of preliminary significance.</p>	N	RiverOak maintains its approach is sufficient.
	<p><u>PEIR: Land Quality</u></p> <p>The potential for receptors to be impacted currently by land quality, and for investigation and remediation measures to be required to prevent ongoing pollution has not been assessed.</p>	N	RiverOak maintains its approach is sufficient.

	<p>The potential for site investigation and remediation measures in themselves to pose a risk to receptors has not been assessed.</p>		
	<p><u>PEIR: Land Quality</u> The effects of a plane crash on land quality and the Environmental Measures to be taken to mitigate risks to the identified receptors has not been assessed.</p>	N	RiverOak maintains its approach is sufficient and also refers TDC to Chapter 17 of the ES (document reference TR020002/APP/5.2-3).
	<p><i>Non-Technical Summary</i> The NTS section on Land Quality does not mention the Lord of the Manor groundwater abstraction, or the adit that lies under the runway that feeds this PWS.</p>	N	RiverOak maintains its approach is sufficient.
	<p><i>Non-Technical Summary</i> The NTS does not mention the likely use of chlorinated solvents at the site, and known impact of the Lord of the Manor PWS with chlorinated solvents, nor does it mention the historic FIDO practices which may mean that there is potentially significant impact to land and groundwater quality with hydrocarbons. The NTS also fails to state how the land may be impacted by a wide range of contaminants, including radiological materials, associated with historic site activities.</p>	N	RiverOak maintains its approach is sufficient.
	<p><i>Non-Technical Summary</i></p>	N	RiverOak maintains its approach is sufficient.

	<p>It states that the 'highest risk of contamination is associated with the risk to groundwater from the Jentex Fuel Farm site.', although in the absence of intrusive site investigation data, this assertion is not supported.</p>		
	<p><i>Non-Technical Summary</i></p> <p>The NTS states that a finalised CEMP will be submitted with the DCO application, to include measures to manage any land quality effects. This contradicts Table 10.8 of Chapter 10 which states that 'a CEMP will be prepared and agreed following consultation with the EA and other relevant stakeholders if necessary prior to commencement of works. A draft outline CEMP will be submitted as part of the DCO application'.</p>	<p>N</p>	<p>RiverOak maintains its approach is sufficient.</p>
	<p><i>Non-Technical Summary</i></p> <p>The NTS states that 'An aerodrome manual will be produced for the operational phase of the Proposed Development and will include measures to manage effects on land quality' An aerodrome manual is however not included in Tables 10.8 or 10.14 of Chapter 10 which describe Environmental Measures and conclusions of preliminary significance respectively.</p>	<p>N</p>	<p>RiverOak maintains its approach is sufficient.</p>
	<p><u>PEIR: Landscape and Visual Impact</u></p> <p>The inclusion of additional viewpoints in line with our previous comments is welcomed. The viewpoint plan submitted broadly accords with the</p>	<p>N</p>	<p>RiverOak maintains its approach is sufficient.</p>

	<p>comments in the Council’s response to the PEIR, however viewpoint 5 is sited on Canterbury Road West, rather than on the A256 adjacent to the eastern extent of the site to the south of the Manston green site. The response to the Council’s request in Table 11.7 of the PEIR is noted, however a viewpoint should still be provided situated to the east of the eastern extent of the site on the Haine Road, given the visibility of the airport from this area from the road and the committed residential development at Manston Green and visual receptor that will be present in this community.</p>		
	<p><u>PEIR: Landscape and Visual Impact</u></p> <p>The PEIR provides wireframes at all 22 locations at Appendix 11.1. These show the highly urbanising effect of the Proposed Development on the landscape of the district, with a significant effect deemed at multiple viewpoints at Appendix 11.3 and the particular effect of the “aircraft breakdown hangers” shown in the wireframe drawings on residential receptors at Manston, amongst other. It would assist the Council if the methodology for the production of the wireframe analysis could be provided, as this is not outlined in any of the documentation, to ensure transparency and accuracy of the display of visual effects of the development. This will also help with explaining to the community how they were produced.</p>	<p>N</p>	<p>RiverOak maintains its approach is sufficient.</p>
	<p><u>PEIR: Landscape and Visual Impact</u></p>	<p>N</p>	<p>RiverOak maintains its approach is sufficient.</p>

	<p>As no detailed mitigation has been produced, nor has this been integrated into the Masterplan, we are not in a position to assess whether the impact on visual receptors and the landscape of the district will be acceptable or not. For example, from viewing the masterplan, no buffer or screening is proposed to be provided along the eastern extent of the site to the south of Manston Road and Manston Village, which will contribute to a significant impact on close views of the site from the village.</p>		
	<p><u>PEIR: Landscape and Visual Impact</u></p> <p>We note that you intend to provide only 6, 9 and 20 viewpoints as visualisations. We are still awaiting an example of the night-time visualisation example previously requested and we will use this to provide our view on which of the viewpoints require visualisation as well as night-time viewpoint assessments. As per our comments last year, no assessment of the effects of lighting from the Proposed Development has occurred according to the PEIR, which in turn means that night-time visualisations have not been produced for consultation. We await further information on the impact on visual receptors from this element of the development.</p>	N	RiverOak maintains its approach is sufficient.
	<p><u>PEIR: Landscape and Visual Impact</u></p> <p>The PEIR states that the mitigation measures incorporated into the Proposed Development are</p>	N	RiverOak maintains its approach is sufficient.

	<p>stated at Table 11.11, whereas it appears these are contained within 11.13. As the submission outlines, these are generic principles which are to be incorporated into the “Manston Airport Design Principles” document which will accompany the DCO. This is at odds with Table 11.7’s response to previous TDC comment, which states that the Design and Access statement sets out the Manston Airport Design Principles. No Design and Access statement is being consulted upon and from the information provided the masterplan has not been informed by the outcomes of the landscape and visual impact assessment in the PEIR. The continued lack of information creates difficulty in commenting at this stage on how the negative visual impact of the development could be limited by the design of buildings and potential embedded mitigation.</p>		
	<p><u>PEIR: Landscape and Visual Impact</u></p> <p>The landscape and visual impact will be considered within the Council’s Local Impact Report upon receipt of the required information.</p>	<p>N</p>	<p>RiverOak notes this comment.</p>
	<p><u>PEIR: Historical Environment</u></p> <p>No additional information regarding archaeological investigation appears to have occurred since the previous consultation. The response to the Council’s comments on required trial trenching is stated as:</p>	<p>N</p>	<p>RiverOak notes this comment.</p>

	<p><i>“Due to limitations on access for intrusive surveys, specific information requirements will be addressed when access can be obtained. The scope of further intrusive survey will be discussed with KCC, TDC and HE. An Archaeological Written Scheme of Investigation will be provided with the ES Chapter. It is recognised that given the gap in understanding, alterations to some of the Proposed Development design may be required to preserve significant assets in situ in the northern grass area.”</i></p>		
	<p><u>PEIR: Historical Environment</u></p> <p>As previously outlined, given the extent of development on the Northern grass within your proposal, it is considered highly likely that you will be required to carry out your own trial trenching in this location to support your submission to the Planning Inspectorate.</p>	N	RiverOak notes this comment.
	<p><u>PEIR: Historical Environment</u></p> <p>KCC (KCC) and Historic England have been consulted on the proposal, and these bodies are key consultees and their expertise should be relied upon.</p>	N	RiverOak notes this comment.
	<p><u>PEIR: Historical Environment</u></p> <p>In relation to indirect-effects from the operation of the airport, paragraph 9.6.16 identifies that the Conservation Areas of Ramsgate, Broadstairs, Minster and Acol are potential receptors of significant adverse indirect effects. The indirect</p>	N	RiverOak maintains its approach is sufficient.

	<p>effects of noise on designated heritage assets under the flightpath does not appear to have been considered within the assessment of indirect effects, rather focusing on the physical changes to the airport site, rather than changes resulting from its operation. For example, listed buildings in the flight path will be unable to change windows to provide additional alleviation from aircraft noise without potential harm to the significance of the asset. This should be addressed within the PEIR, as the report at reference 169 does not consider this type of indirect impact, rather focusing on the measure of noise impact.</p>		
	<p><u>PEIR: Traffic and Transportation</u></p> <p>KCC will comment on the impact from the development on the highway network, and their expertise should be relied upon.</p>	N	RiverOak notes this comment.
	<p><u>PEIR: Traffic and Transportation</u></p> <p>As previously outlined, the scope of the transport assessment should include the expected housing requirement within the Proposed Revisions to draft Local Plan (preferred options) document from January 2017, including any additional housing requirement resulting from your development. We remain concerned about the potential impacts on the network surrounding the site from both construction and operational phase given the likely level of traffic generated by the Proposed</p>	N	The draft Local Plan has now been withdrawn.

	Development, especially regarding Spitfire Way, Spitfire Junction and Manston Court Road.		
	<p><u>PEIR: Traffic and Transportation</u></p> <p>The methodology for distributing trips on the network for the Transport Assessment should be based on either the KCC and TDC strategic model, or a similar strategic model compatible with the KCC and TDC built for the purpose of analysing the distribution of trips on the network. A spreadsheet model is considered inappropriate for the level of trip generation created by the Proposed Development without further information on how compatible this model is with the strategic model. Please refer to KCC Highways and Transportation for further guidance.</p>	N	A formal request to use the KCC model has been made and a detailed scoping/methodology note will be provided to KCC following the submission of this DCO. RiverOak remains committed to additional strategic traffic and transport modelling in conjunction with KCC to agree a set of proposals that will be required to allow development of the airport to come forward.
	<p><u>PEIR: Traffic and Transportation</u></p> <p>Physical improvements to the network are alluded to within the updated PEIR, however they are only briefly outlined with no detailed plans produced. A crossroad junction proposed at the junction of Spitfire Way and Manston Road would be preferably a roundabout, however we await further information on how this revised junction would operate with the movement proposed. The Proposed Development does not include the northern link from Manston Road to Westwood Cross within the site. This link forms part of the 'inner circuit' within the Thanet Transport Strategy (TTS). Given that the commercial development on</p>	N	RiverOak does not wish there to be a public highway running through the Northern Grass.

	<p>the northern grass appears to serve no functional purpose to the operation of the airport to the south, this area can and should be re-designed to include this route. The Proposed Development will also be required to contribute a proportionate amount to the Manston Airport-Haine Road link in the TTS outside of the extent of the site.</p>		
	<p><u>PEIR: Biodiversity</u></p> <p>KCC, Natural England and EA will comment as key consultees on the impact from the proposal on biodiversity and their expertise should be relied upon.</p>	<p>N</p>	<p>RiverOak notes this comment and asks TDC to note that KCC, Natural England and the EA have provided comments which can be seen in this table and in Table 10.1 above. .</p>
	<p><u>PEIR: Health and Wellbeing</u></p> <p>The PEIR states that a number of factors contribute towards a greater potential sensitivity to health impacts in the district, with the magnitude of impact on public health dependent on the size of the change in noise or air pollution. Significant concerns are raised about the potential impact from the Proposed Development at all stages on public health and wellbeing, especially regarding potential sleep disturbance from the operation of the airport.. This section of the PEIR is intrinsically linked to Sections 6 and 12 of the PEIR and the assessments made. However as the significance of this impact is yet to be quantified, with the Health Impact Assessment (HIA) yet to be carried out, we are unable to comment on the implications of the Proposed Development on this matter.</p>	<p>N</p>	<p>RiverOak notes this comment.</p>

	<p><u>PEIR: Health and Wellbeing</u></p> <p>The non-technical PEIR summary states that an HIA Scoping Statement has been produced, however this has not been provided for comment. It is also noted that a health forum is to be carried out in coordination with the Kent Director of Public Health. TDC should be invited to participate in this forum, given the potential significant effects suggest by the PEIR on the local population.</p>	N	RiverOak notes this comment.
	<p>Given the current deficiency in information with a lack of an HIA at this stage of consultation, the Council will await further information in your submission before considering the impact of your Proposed Development on health and wellbeing.</p>	N	RiverOak notes this comment.
	<p>Other matters</p> <p><i>Aircraft Teardown Hangers</i></p> <p>The previous consultation stated the presence of an “Aircraft Teardown Facility” within your Proposed Development, however provided little detail within the PEIR. This facility appears to be replaced in the new PEIR by three “Maintenance, Repair and Overhaul (MRO)” hangers to be provided over the four phases of construction, with all hangers stated as being capable of accommodating the largest aircraft (Class F). This facility is separately referred to in the PEIR as “a small maintenance repair and overhaul (MRO) facility with approximately 10 aircraft per year being</p>	N	RiverOak notes this comment.

	<p>dismantled and recycled”. No other information is provided, and therefore our comments in our previous consultation response remain valid. These are found below:</p>		
	<p><i>“it is worth noting our concern with this proposal given the historic use of the site and enforcement action taken against similar operations previously due to potential contamination. It is imperative that more information is provided at the earliest stage to the local community about this facility and how it will operate. This should include but not be restricted to how fuels and other harmful or toxic materials will be removed from airplanes during breaking. We advise early discussions with the EA on this element of the Proposed Development. On the basis of no information being provided about the facility, we are concerned about the need, viability and operation of such a facility within a Groundwater Source Protection Zone.”</i></p>	<p>N</p>	<p>RiverOak notes this comment.</p>
	<p><i>Climate Change</i></p> <p>EA will comment as key consultees on the impact from the proposal on climate change and their expertise should be relied upon.</p>	<p>N</p>	<p>RiverOak notes this comment.</p>
	<p><i>Major Accident and Disasters</i></p> <p>The Council note that this section will continue to be developed for inclusion within the ES to be submitted. Initial comments are made with regard to the lack of details of the anticipated Public Safety</p>	<p>N</p>	<p>RiverOak notes this comment.</p>

	<p>Zones for the airport, whether the CAA have been engaged at this stage on the matter, and how this impacts on the potential receptors affected by the Proposed Development, particular with regarding to the existing or future residential population (including committed development).</p>		
	<p><i>Cumulative Impact</i></p> <p>The inclusion of the Manston Green and Eurokent sites into the cumulative effects assessment is welcomed. The assessment of cumulative impact may require additional sites for inclusion when the ES is finalised.</p>	<p>N</p>	<p>RiverOak notes this comment.</p>
	<p>Conclusion</p> <p>There are potentially significant detrimental environmental and amenity impacts on Thanet and its local community from the development and these have not been addressed in the PEIR. The Council remain significantly concerned about the potential impact from your Proposed Development on the living conditions of those residential occupiers within close proximity of the airport, those residents living under the (indicative) flight paths, especially in relation to night flights, as well as disruption to multiple schools within the district. Further survey and investigatory work is required before the full impacts of your Proposed Development can be quantified.</p>	<p>N</p>	<p>RiverOak notes this comment.</p>

	<p>The ramifications on the proposal on the countryside has still not been assessed adequately in terms of visual impact and potential housing need, and there is a deficiency in information relating to delivery of the Proposed Development or viability over the short, medium and long term which undermines any perceived economic benefits to the district from the Proposed Development.</p>	N	RiverOak notes this comment.
	<p>If the DCO and compulsory acquisition is successful, you will be required to work with the Council as the host authority, when dealing with detailed matters for the Proposed Development. We are extremely disappointed that you have been unwilling to enter into a Planning Performance Agreement (PPA) with TDC to allow us to ensure that adequate resources for handling the NSIP process are available and to encourage joint working between the applicant and statutory consultees.</p>	N	RiverOak notes this comment and can confirm that a PPA with TDC is now being negotiated.
	<p>The above comments are made without prejudice to the Council's written representation submission, adequacy of consultation and local impact report on the NSIP application.</p>	N	RiverOak notes this comment.
	<p>The above comments are made without prejudice to the Council's written representation submission, adequacy of consultation and local impact report on the NSIP application.</p>	N	RiverOak notes this comment.

Parish councils are not strictly Local Authorities for this purpose but their responses are included here			
Acol Parish Council	General support for reopening of Manston Airport.	N	RiverOak notes and welcome this response.
	Supportive of additional proposals, such as additional construction and road improvements.	N	RiverOak notes and welcome this response.
Minster Parish Council	Pleased that feedback in relation to Spitfire Junction has been addressed and improvements are planned. The plan to provide an entrance nearer the western end of the site for freight traffic will also ease traffic pressures on that stretch of road.	N	RiverOak notes and welcomes this response.
	Satisfied that RiverOak has addressed the issues of drainage, waste and health.	N	RiverOak notes and welcomes this response.
	Many residents are used to the presence of an airport and therefore noise has not been a primary concern. However, Minster PC is aware that a significant minority have raised concerns and the comprehensive document you have produced undoubtedly goes a long way in assuaging these concerns.	N	RiverOak notes and welcomes this response. RiverOak understands the concern that some residents have about noise and is therefore proposing a policy which imposes movement limits combined with measures to reduce noise. Further information can be found in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4).
	Support the re-opening of an airport at Manston, It is a valuable national asset and of strategic importance. In local terms, it is much more likely to prompt investment and growth in the area than thousands of houses and more industrial units.	N	RiverOak agrees with Minster Parish Council and welcomes this response.

Wingham Parish Council	At their meeting on Monday 12 February, councillors resolved to support the reopening of Manston as an airport as they feel this is very important for local jobs and that the asset is currently being wasted. However, they would like to stress the importance of ensuring appropriate infrastructure is put in place to service any future airport business at this site.	N	RiverOak welcomes this response and agrees with Wingham Parish Council.
Ramsgate Town Council	Re-iterates previous response to the 2017 statutory consultation. “Minute of meeting held on 7 February 2018: “Minor peripheral changes with no significant impact on the site in relation to the application as a whole do nothing to change Ramsgate Town Council’s view.””		RiverOak notes this response. Comments on the issues previously raised are addressed in Table 7.2 above.

Table 10.4: PILs responses by letter and how RiverOak had regard to the responses. (These are PILs that were identifiable from the name and/or address provided on consultation responses. Other PILs may have also responded but as they are unidentifiable their responses are grouped in Chapter 11 below, in Tables 11.8 – 11.12.)

Consultee Response ID	Date consulted	Summary of Response/Issue	Change? Y / N	Regard had to response/Mitigation
BDB0110	12 January 2018	Objects to the proposals.	N	RiverOak notes this response but disagrees.
		Has environmental concerns as in the past, aircraft left oily residue in pond.	N	This is not expected to be an impact with RiverOak’s different proposals.
		Aircraft pose a danger to residents as they fly immediately over a fuel depot.	N	This has been assessed in Chapter 17 of the ES (document reference TR020002/APP/5.2-3)
BDB0239	12 January 2018	Strongly objects to the proposals.	N	RiverOak notes this response but disagrees.
		Information provided is flawed and misleading and the plan is “inadequate” in informing local residents of the effects on health and the local economy.	N	RiverOak notes this response but disagrees. The Health Impact Assessment, Appendix 15.1 of the ES (document reference TR020002/APP/5.2-13) assesses the potential health impacts associated with changes in noise and air pollution. Where adverse effects are predicted, measures to mitigate these are set out in the ES and the Noise Mitigation Plan (document reference TR020002/APP/2.4).

		There has been inadequate consultation of local residents on the proposal and its wider implications.	N	As set out in this Report, RiverOak believes its three stage consultation was robust and had an appropriate reach.
BDB0240	12 January 2018	Strongly objects to the proposals.	N	RiverOak notes this response but disagrees.
		There has been inadequate consultation of local residents on the proposal and its wider implications.	N	As set out in this Report, RiverOak believes its three stage consultation was robust and had an appropriate reach.
		Key proposals have been presented in an adaptive manner, giving the proposals a distorted gloss.	N	RiverOak strongly disagrees with this statement. A full environmental impact assessment has been carried out which has identified both the potential benefits and impacts of the Proposed Development. This is set out in full detail in the ES (document reference TR020002/APP/5.2) .
BDB0259	12 January 2018	Objects to night flights;	Y	RiverOak is proposing a night time policy which imposes movement limits combined with measures to reduce noise. Further information can be found in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4) .

BDB0546	12 January 2018	Is opposed to another airport and believes that housing is a more common sense option. Building houses will provide jobs, unlike the temporary jobs at the airport.	N	As of January 2018, the Manston Airport site is no longer being promoted as a mixed use settlement for up to 2,500 new homes in the new draft Thanet Local Plan. Thanet District Council launched a 'Call For Sites' in February 2018 which invites anyone to submit details of a site that they consider suitable for development. This could include sites suitable for housing development which have not yet been considered by the Council that could absorb the 2,500 houses previously allocated at the airport. The Manston site is zoned for aviation use and reopening the airport will provide much needed employment opportunities in an area of relatively high deprivation. The Azimuth Report (document reference TR020002/APP/7.4) provides details of the case for reopening the airport in some depth and finds that there are no other airports that can be used to reduce the impact of UK airport capacity constraints on the freight market.
		A freight airport will disrupt lives due to the noise and emissions.	N	The air quality effects resulting from the Proposed Development have been assessed in Chapter 6: Air Quality of the ES (document reference TR020002/APP/5.2-1). The assessment shows that air quality will remain comfortably within legal limits. These legal limits are themselves based on World Health Organization guidance on health effects, allowing for the most vulnerable members of society. The air quality impacts of the airport are small and confined to the vicinity of the airfield and certain major roads. The impact of air quality on wildlife, ecosystems and biodiversity is assessed in Chapter 7: Biodiversity of the ES (document reference TR020002/APP/5.2-1) and is shown to be not significant.

				The potential noise effects resulting from the Proposed Development have been assessed in Chapter 12: Noise of the ES (document reference TR020002/APP/5.2-2). A summary of the significant residual effects is provided at Section 12.10. Based on this assessment, RiverOak has developed a Noise Mitigation Plan to reduce noise effects (document reference TR020002/APP/2.4). The impact of noise on wildlife, ecosystems and biodiversity is assessed in Chapter 7: Biodiversity of the ES (document reference TR020002/APP/5.2-1).
		The impact of night flights on residents has not been taken into account.	Y	RiverOak understands the concern that some residents have about night flights and is therefore RiverOak is proposing a night time policy which imposes movement limits combined with measures to reduce noise. Further information can be found in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4).
13060	12 January 2018	Strongly opposed to the proposals.	N	RiverOak notes this response although it disagrees.
		Although local traffic system will be enhanced, there may still be an issue with freight lorries and cars driving to local towns	N	A Transport Assessment (document reference TR020002/APP/5.2-15) has been carried out and is reported on in Chapter 14 of the ES (document TR020002/APP/5.2-2). This assesses, amongst other things, operational junction capacity and puts forward suggestions for mitigating against impacts.
		Air pollution and noise will be a big health problem for towns on the flight path. Concerned that aircraft will circle waiting to land.	N	The air quality effects resulting from the Proposed Development have been assessed in Chapter 6: Air Quality of the ES (document reference TR020002/APP/5.2-1). The assessment shows that air quality will remain comfortably

				<p>within legal limits. These legal limits are themselves based on World Health Organization guidance on health effects, allowing for the most vulnerable members of society. The air quality impacts of the airport are small and confined to the vicinity of the airfield and certain major roads. The impact of air quality on wildlife, ecosystems and biodiversity is assessed in Chapter 7: Biodiversity of the ES (document reference TR020002/APP/5.2-1) and is shown to be not significant.</p> <p>The potential noise effects resulting from the Proposed Development have been assessed in Chapter 12: Noise of the ES (document reference TR020002/APP/5.2-1). A summary of the significant residual effects is provided at Section 12.10. Based on this assessment, RiverOak has developed a Noise Mitigation Plan to reduce noise effects (document reference TR020002/APP/2.4). The impact of noise on wildlife, ecosystems and biodiversity is assessed in Chapter 7: Biodiversity of the ES (document reference TR020002/APP/5.2-1).</p> <p>The capacity of the airport will mean that very few aircraft will have to hold in the air or on the ground, thus reducing noise impact.</p>
		Is concerned that the waste from the airport will end up in the sea / on the beaches.	N	Waste will be controlled and water will be treated before being discharged.
		Opposes the re-opening as the area is popular as a holiday and recreational area.	N	The effects on tourism are discussed within Chapter 13: Socio-Economics of the ES (document reference TR020002/APP/5.2-2). Tourism receptors in the vicinity of the Proposed Development may experience effects resulting from the increased activity in the geographical area, in both

				<p>construction and operational phases. For tourism businesses within the surrounding area, the increased visitor numbers associated with the airport operation, in conjunction with increased incomes from employees at Manston, will likely lead to increased demand for tourism facilities and associated spending in the locality. This could result in improvements to their volume of trade.</p> <p>In terms of indirect impacts, such as increased traffic, noise or dust, detailed assessments have been undertaken in Chapter 6: Air Quality, Chapter 12: Noise and Chapter 14: Traffic and Transport of the ES (document reference TR020002/APP/5.2-1 – 5.2-2). The negative effects on tourism are commonly observed to be related to noise and traffic.</p> <p>The effects of noise on tourist businesses will be minimal as the increase in urban areas will be small compared to existing sources. Aircraft noise will increase at the main beach in the centre of Ramsgate which is already subject to urban noise but there will be no noticeable noise increases at any other Kent beaches.</p> <p>Outside these areas the effects will depend on existing background levels but in general are considered sufficiently low not to affect the level of business activity or value. The site is well connected by road and rail and traffic increases are assessed to be minimal. The effects of traffic on tourism are considered to be low and will not affect the level of business activity or value.</p>
13073	12 January 2018	No comments provided.	N	RiverOak notes this.

13305	12 January 2018	Supports the proposals.	N	RiverOak notes and welcomes this response.
		Believes that it is a good idea to upgrade Spitfire Way Junction.	N	RiverOak notes and welcomes this response.
		Comments that any help with noise is positive (reference to the Noise Mitigation Plan)	Y	RiverOak notes and welcomes this response. RiverOak is proposing a night time policy which imposes movement limits combined with measures to reduce noise. Further information can be found in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4).
		States that there is no infrastructure for more housing and supports the proposals.	N	RiverOak notes, welcomes and agrees with this response.
13327	12 January 2018	Is opposed to the proposals.	N	RiverOak notes this response but disagrees.
		Against re-opening as the airport has failed in the past.	N	For many years, Manston Airport operated without investment in infrastructure required for a state-of-the-art freight hub. Comparisons between past operations and the proposed plan for Manston cannot be made. The Azimuth Report (document reference TR020002/APP/7.4) make a clear case for the need for and future of the airport. The impact of Brexit is not possible to fully determine until negotiations with the EU are complete. However, trading further afield than mainland Europe will make the transport of goods by HGV impractical. The use of air freight is

				therefore likely to increase as the UK trades with emerging economies as well as existing markets.
		Improvements will not stop the noise and pollution to the Thanet Area. Jets will be above the permitted level under planning conditions.	N	Noise and air quality will be mitigated through our proposals
		Does not believe the proposals will help the environment.	N	They have undergone a full Environmental Impact Assessment and RiverOak believes the benefits of the project strongly outweigh its adverse impacts
		Believes that the land should be set aside for housing development with associated facilities (community services) instead.	N	As of January 2018, the Manston Airport site is no longer being promoted as a mixed use settlement for up to 2,500 new homes in the new draft Thanet Local Plan. Thanet District Council launched a 'Call For Sites' in February 2018 which invites anyone to submit details of a site that they consider suitable for development. This could include sites suitable for housing development which have not yet been considered by the Council that could absorb the 2,500 houses previously allocated at the airport. The Manston site is zoned for aviation use and reopening the airport will provide much needed employment opportunities in an area of relatively high deprivation. The Azimuth Report (document reference TR020002/APP/7.4) provides details of the case for reopening the airport in some depth and finds that there are no other airports that can be used to reduce the impact of UK airport capacity constraints on the freight market.
13352		Opposed to the proposals.	N	RiverOak notes this comment but disagrees.

	12 January 2018	Objects to the number of aircraft.	Y	RiverOak understands that this is a concern for some respondents and has therefore developed a Noise Mitigation Plan to reduce noise effects (document reference TR020002/APP/2.4).
		Objects to the noise and casts doubt on mitigation measures. Residents near Gatwick and Heathrow still complain about noise and pollution even though they have the latest aircraft flying overhead.	Y	The potential noise effects resulting from the Proposed Development have been assessed in Chapter 12: Noise of the ES (document reference TR020002/APP/5.2-1). A summary of the significant residual effects is provided at Section 12.10. Based on this assessment, RiverOak has developed a Noise Mitigation Plan to reduce noise effects (document reference TR020002/APP/2.4). The impact of noise on wildlife, ecosystems and biodiversity is assessed in Chapter 7: Biodiversity of the ES (document reference TR020002/APP/5.2-1).
13360	12 January 2018	Opposes the proposals.	N	RiverOak notes this comment but disagrees.
		The number of flights is not acceptable as there will be more night flights than at Heathrow. The flights will disrupt nights, schools, businesses, homes and tourism.	Y	RiverOak understands that this is a concern for some respondents and is therefore proposing a number of measures: RiverOak is proposing a night time policy which imposes movement limits combined with measures to reduce noise. Further information can be found in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4). The Health Impact Assessment, Appendix 15.1 of the ES (document reference TR020002/APP/5.2-13) and Chapter 15 of the ES (document reference TR020002/5.2-2) assesses the potential health impacts associated with

			<p>changes in noise and air pollution. Where adverse effects are predicted, measures to mitigate these are set out in the ES. The Noise Mitigation Plan specifies that reasonable levels of noise insulation and ventilation for schools within the 60 dB L_{Aeq} (16 hour) day time contour will be provided. No significant effect on sleep disturbance is predicted due to the anticipated low number and noise of night-time flights.</p> <p>The effects on tourism are discussed within Chapter 13: Socio-Economics of the ES (document reference TR020002/APP/5.2-2). Tourism receptors in the vicinity of the Proposed Development may experience effects resulting from the increased activity in the geographical area, in both construction and operational phases. For tourism businesses within the surrounding area, the increased visitor numbers associated with the airport operation, in conjunction with increased incomes from employees at Manston, will likely lead to increased demand for tourism facilities and associated spending in the locality. This could result in improvements to their volume of trade.</p> <p>In terms of indirect impacts, such as increased traffic, noise or dust, detailed assessments have been undertaken in Chapter 6: Air Quality, Chapter 12: Noise and Chapter 14: Traffic and Transport of the ES (document reference TR020002/APP/5.2-1 – 5.2-2). The negative effects on tourism are commonly observed to be related to noise and traffic.</p> <p>The effects of noise on tourist businesses will be minimal as the increase in urban areas will be small compared to existing sources. Aircraft noise will increase at the main beach in the centre of Ramsgate which is already subject to</p>
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				<p>urban noise but there will be no noticeable noise increases at any other Kent beaches.</p> <p>Outside these areas the effects will depend on existing background levels but in general are considered sufficiently low not to affect the level of business activity or value. The site is well connected by road and rail and traffic increases are assessed to be minimal. The effects of traffic on tourism are considered to be low and will not affect the level of business activity or value.</p>
		Believes that the proposals will reduce the value of her property.	N	RiverOak will compensate landowners who can show that their properties have lessened in value due to the construction or operation of the airport when they come to sell them.
13434	12 January 2018	Opposes proposals.	N	RiverOak notes this response but disagrees.
		Noise and pollution over the residential area cannot be stopped or mitigated. New roads/junction will not stop the impact of noisy planes. Believes the proposals will disturb the lives of many people.	Y	<p>A full environmental impact assessment has been carried out which has identified both the potential benefits and impacts of the Proposed Development. This is set out in full detail in the ES (document reference TR020002/APP/5.2-1 – 5.2-15).</p> <p>In particular, the air quality effects resulting from the Proposed Development have been assessed in Chapter 6: Air Quality of the ES (document reference TR020002/APP/5.2-1). The assessment shows that air quality will remain comfortably within legal limits. These legal limits are themselves based on World Health Organization guidance on health effects, allowing for the most vulnerable members of society. The air quality impacts of the airport are small and confined to the vicinity of the airfield and certain</p>

				<p>major roads. The impact of air quality on wildlife, ecosystems and biodiversity is assessed in Chapter 7: Biodiversity of the ES (document reference TR020002/APP/5.2-1) and is shown to be not significant.</p> <p>The potential noise effects resulting from the Proposed Development have been assessed in Chapter 12: Noise of the ES (document reference TR020002/APP/5.2-1). A summary of the significant residual effects is provided at Section 12.10. Based on this assessment, RiverOak has developed a Noise Mitigation Plan to reduce noise effects (document reference TR020002/APP/2.4). The impact of noise on wildlife, ecosystems and biodiversity is assessed in Chapter 7: Biodiversity of the ES (document reference TR020002/APP/5.2-1).</p>
		Is strongly against “24/2 flying” and raises pollution concerns. Opposed to noise of planes and smell from heavy cargo planes.	N	<p>For comment on noise and pollution, please refer to RiverOak’s comment immediately above.</p> <p>The impact of odour from the airport has been assessed in Appendix 6.4 to Chapter 6: Air Quality in the ES (document reference TR020002/APP/5.2-1) and is not expected to be significant.</p>
13751	12 January 2018	Generally supportive of proposals.	N	RiverOak notes and welcomes this response.
		Is pleased that highway junctions will be improved.	N	<p>RiverOak notes and welcomes this response.</p> <p>Further information about improvements can be found in the Transport Assessment (document reference TR020002/APP/5.2-15).</p>

		Would welcome the proposals so long as there are only a small number of night flights.	Y	RiverOak is proposing a night time policy which imposes movement limits combined with measures to reduce noise. Further information can be found in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4).
13508	12 January 2018	Supportive of proposals.	N	RiverOak notes and welcomes this response.
		Supportive of Noise Mitigation Plan. Lived on the flight path when the airport was previously running and did not have any issues with noise.	N	RiverOak notes and welcomes this response. Further information about mitigating the impacts of noise can be found specifically in the Noise Mitigation Plan (document reference TR020002/APP/2.4).
		Supportive of re-opening for economic prosperity of Thanet	N	RiverOak welcomes this response and agrees that the Proposed Development would bring economic prosperity to Thanet.
14381	12 January 2018	Generally supportive/neutral. Would like to see the airport re-opened.	N	RiverOak notes this response.
		Concerned by the lack of information requested by TDC. Operator has not been forthcoming to TDC on its funding.	N	RiverOak is a private investor and is under no obligation to provide details of its funding to TDC. Details of how the Proposed Development is to be funded do need to be provided pursuant to provisions of the PA 2008 and are done so in the Funding Statement (document reference TR020002/APP/3.2).
		Raises environmental concerns in relation to the plane scrap yard.	N	The proposals are for a recycling facility rather than a scrap yard.

		Believes that there should be no regular night flights between 11pm-5am.	Y	RiverOak is proposing a night time policy which imposes movement limits combined with measures to reduce noise. Further information can be found in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4).
15230	12 January 2018	Would like decibel information and to monitor the noise, queries how residents will know when the noise is not above the permitted level.	Y	The consultative committee will be provided with noise monitoring data.
		Believes the noise may affect the health of residents. Further concerns relating to re-opening of flight school in addition to cargo planes.	Y	The Health Impact Assessment, Appendix 15.1 of the ES (document reference TR020002/APP/5.2-13) assesses the potential health impacts associated with changes in noise and air pollution. Where adverse effects are predicted, measures to mitigate these are set out in the ES and the Noise Mitigation Plan (document reference TR020002/APP/2.4).
		Concerned about devaluation of property and would like to know if RiverOak will buy “blighted property” or pay for “noise insulation”.	N	RiverOak will abide by statutory blight provisions and is offering £4000 for insulation to properties within its insulation scheme (document references TR020002/APP/2.4)
		Freight/cargo will mean that there will be more lorries on already congested roads.	N	The Transport Assessment (document reference TR020002/APP/5.2-15) identifies a package of mitigation measures that are appropriate for the development proposals.
		Believes the consultation is only being seen to be done.	N	As set out in this Report, RiverOak believes its three stage consultation was robust and had an appropriate reach.

		No date has been set for opening.	N	There is no set date for the opening of the Proposed Development yet as this depends on a number of factors, including but not limited to the timetable for the examination of the DCO application and the appointment of construction contractors.
15553	12 January 2018	Supportive of proposals.	N	RiverOak notes and welcomes this response.
		Notes that Ramsgate has been in flightpath for years so those that chose to live in area should be accepting of the proposals.	N	RiverOak notes this response.
		Support the proposals on economic grounds and the consequential social benefits.	N	RiverOak welcomes this response and agrees that the Proposed Development would bring economic prosperity to Thanet.
15554	12 January 2018	Supports the proposals. Large sustainable projects such as the proposals, will drive economic regeneration.	N	RiverOak welcomes this response and agrees that the Proposed Development would bring economic prosperity to Thanet.
15854	12 January 2018	Generally supportive of the proposals and the opportunity to see aircraft over the area again.	N	RiverOak notes and welcomes this comment.
15882	12 January 2018	Generally supportive of the proposals.	N	RiverOak notes and welcomes this response.
		Concerned that the upgrades and improvements to Spitfire Way may affect the value of her property.	N	RiverOak will compensate landowners who can show that their properties have lessened in value due to the construction or operation of the Proposed Development when they come to sell them, according to the national compensation code

		Concerned that the increase in Heavy Goods Vehicles will affect the stability of her Property.	N	There is no evidence that the increase of HGVs will affect the stability of any property.
		Would like further details on the plans to purchase the 7 cottages (properties affected by blight)	Y	The Noise Mitigation Plan (document reference TR020002/APP/2.4) has been amended to set out the relocation policy; statutory blight is payable once the application is made, for eligible properties
		Believes that there will be an increase in pollution.	N	The air quality effects resulting from the Proposed Development have been assessed in Chapter 6: Air Quality of the ES (document reference TR020002/APP/5.2-1). The assessment shows that air quality will remain comfortably within legal limits. These legal limits are themselves based on World Health Organization guidance on health effects, allowing for the most vulnerable members of society. The air quality impacts of the airport are small and confined to the vicinity of the airfield and certain major roads. The impact of air quality on wildlife, ecosystems and biodiversity is assessed in Chapter 7: Biodiversity of the ES (document reference TR020002/APP/5.2-1) and is shown to be not significant.
		Queries whether new jobs will be available to local residents.	N	RiverOak undertakes that training opportunities will be developed for young people living locally and that, subject to the operation of law, priority will be given to local people in terms of job opportunities and recruitment.
ANON-7B79-UB1D-N	12 January 2018	Night flights will “seriously damage” health, and raises concerns about noise and height of planes in the air. This may cause sleeping problems.	Y	The Health Impact Assessment, Appendix 15.1 of the ES (document reference TR020002/APP/5.2-13) assesses the potential health impacts associated with changes in noise and air pollution as well as a number of other factors. Where adverse effects are predicted, measures to mitigate

				<p>these are set out in the ES and the Noise Mitigation Plan (document reference TR020002/APP/2.4).</p> <p>No significant effect on sleep disturbance is predicted due to the anticipated low number and noise of night-time flights.</p>
		The roads leading to and around the airport were not built for the amount of HGV traffic that will be created by the proposals.	N	<p>A Transport Assessment (document reference TR020002/APP/5.2-15) has been carried out and is reported on in Chapter 14 of the ES (document TR020002/APP/5.2-2). This assesses, amongst other things, operational junction capacity and puts forward suggestions for mitigating against impacts.</p>
		Is opposed to the increase in HGVs, noise and pollution from the proposals.	N	<p>The air quality effects resulting from the Proposed Development, including HGV movements, have been assessed in Chapter 6: Air Quality of the ES (document reference TR020002/APP/5.2-1). The assessment shows that air quality will remain comfortably within legal limits. These legal limits are themselves based on World Health Organization guidance on health effects, allowing for the most vulnerable members of society. The air quality impacts of the airport are small and confined to the vicinity of the airfield and certain major roads. The impact of air quality on wildlife, ecosystems and biodiversity is assessed in Chapter 7: Biodiversity of the ES (document reference TR020002/APP/5.2-1) and is shown to be not significant.</p> <p>The potential noise effects resulting from the Proposed Development, including from HGVs, have been assessed in Chapter 12: Noise of the ES (document reference TR020002/APP/5.2-1). A summary of the significant residual effects is provided at Section 12.10. Based on this assessment, RiverOak has developed a Noise Mitigation</p>

				Plan to reduce noise effects (document reference TR020002/APP/2.4). The impact of noise on wildlife, ecosystems and biodiversity is assessed in Chapter 7: Biodiversity of the ES (document reference TR020002/APP/5.2-1).
ANON-7B79-UB1F-Q	12 January 2018	Opposed to the proposals.	N	RiverOak notes this response but disagrees.
		Proposals are unrealistic and detrimental to the wellbeing of local residents.	N	RiverOak disagrees. The Azimuth Report (document reference TR020002/APP/7.4) provides a detailed case for the reopening of the airport. It is clear that the UK needs additional airport capacity. The evidence shows that air freight is particularly vulnerable to capacity constraints not only in the UK but also in Europe (see the Schiphol Airport example). Manston Airport zoned for aviation use, can provide some of the much-needed capacity almost immediately. RiverOak's planned investment in the airport would provide state-of-the-art facilities for freight, addressing many of the current difficulties experienced by freighter operators.
		Economic benefits are unproven. Proposal for Manston as a reliever airport for the South East was dismissed in 2015.	N	In addition to the Azimuth Report referred to above, Chapter 13 of the ES (document reference TR020002/APP/5.2-2) sets out the socio-economic benefits (as well as potential impacts) of the Proposed Development.
		RiverOak does not have a track record with NSIPs or DCOs. For a project of this size, the company should have a proven track record of managing large infrastructure projects, or a track record of running an airline business or history of freight handling.	N	RiverOak personnel have a track record of infrastructure investment and will appoint experts to run the airport.

		Hard to see how the airport will compete with an established operation elsewhere with far better supporting infrastructure.	N	As set out in the Azimuth Report (document reference TR020002/APP/7.4), the demand for air freight is set to increase by more than 50% across the period 2015 to 2035. London's six airports - Heathrow, Gatwick, Stansted, Luton, London City and Southend - facilitate approximately 76% of the UK's air freight. However, the Airports Commission report shows that all London airports will be at capacity by 2030. Therefore, the Proposed Development will not take freight away from other UK based airports but instead will help meet air freight capacity requirements.
		Does not believe that regenerating a closed airport should qualify as an NSIP.	N	RiverOak's NSIP justification document (document reference TR020002/APP/2.3) sets out RiverOak's case for why the Proposed Development satisfies the test set out in s.23 of the Planning Act 2008 i.e. why the airport is considered an NSIP.
		The claim that freight capacity can be increased to 10,000 cargo movements per year is disingenuous.	N	RiverOak disagrees that this is a disingenuous claim. This is based on RiverOak's business case for the Proposed Development.
		Concern regarding the directors and their attempts to regenerate airports in the past.	N	RiverOak notes that this is not a concern relevant to its DCO application.
		Believes documentation is misleading and that the proposed airport is closer than the 4km stated.	N	All distances as provided in application documents are correct as far as RiverOak is aware.
		Consultation events held were disappointing - no communication posted directly to door. Due to crowded venues, it was difficult to ask questions at events. Size of PEIR report meant that it was	N	As set out in this Report, RiverOak believes its three stage consultation was robust and had an appropriate reach.

		unrealistic to expect consultees to read within the allotted timeframe.		
		Noise monitoring will not include Ramsgate. Queries how noise will be monitored if monitoring stations are further away than affected homes.	N	Noise monitoring will follow accepted guidance as to its location.
		Issue with number of night flights proposed. Luton, Heathrow and Stansted airports have lower night time Quota Counts than what has been applied for.	Y	The potential noise effects resulting from the Proposed Development have been assessed in Chapter 12: Noise of the ES (document reference TR020002/APP/5.2-1). A summary of the significant residual effects is provided at Section 12.10. Based on this assessment, RiverOak has developed a Noise Mitigation Plan to reduce noise effects (document reference TR020002/APP/2.4). This plan was consulted upon in the 2018 statutory consultation and as a result of feedback received has been modified by cutting the Quota Count by nearly 50%.
		Unable to identify which houses will be entitled to receive compensation or insulation.	N	Houses within the 63dB daytime or 55dB night-time noise contours, as set out in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) will be entitled to £4000 of insulation costs. Compensation will follow the national compensation code
		Light pollution from runway lights will intrude over Minster and Pegwell Bay.		The development of lighting for the Proposed Development will form part of the detailed design process and, within the confines of the CAA regulations for airports, that scheme would adopt lighting principles that seek to minimise light spill. It is likely that such measures would primarily be applied to the airport related development on the Northern Grass area and any landside components of development that are not the subject of specific lighting design

				requirements. Lighting design will provide additional information to supplement, but not supersede, the assessments made in Chapter 11 Landscape and Visual of the ES (Document reference TR020002/APP/5.2-2).
		Entire site is underlain by aquifer. Concerned about safety of Thanet's water supply.	N	RiverOak is being very careful to protect the aquifer that runs roughly beneath the runway, particularly with respect to the redesign of the existing fuel farm nearby. We are in discussion with the EA on the issue of water contamination and will seek their agreement of our final mitigation measures.
		Concerns relating to effect of fuel pollutants. Aviation fastest growing source of greenhouse gas emissions.	N	Greenhouse gases emissions and potential effect have been considered in Chapter 16 of the ES (document reference TR020002/APP/5.2-2).
		Concerns over road network not being able to sustain increased movements. Nearby roads frequently suffer extensive works due to road subsidence. High accident rate on A299 so it is frequently closed.	N	<p>A Transport Assessment (document reference TR020002/APP/5.2-15) has been carried out and is reported on in Chapter 14 of the ES (document TR020002/APP/5.2-2). This assesses, amongst other things, operational junction capacity and puts forward suggestions for mitigating against impacts.</p> <p>As part of the Transport Assessment detailed junction models for 28 local junctions as well as all the access junctions to the site have been prepared to inform where junction mitigation proposals may be required.</p> <p>The junctions modelled include junctions in Broadstairs, Margate, Ramsgate and Manston, key A299 junctions and many others and include the key junctions along Spitfire Way.</p>

		Concerned about safety issues regarding location of fuel site. Status of the Jentex site and whether it is included within the proposals. Danger to residential dwellings due to proximity of fuel site.	N	The fuel site operated when the airport was previously open; it will be upgraded and operated to the satisfaction of the EA, as per Requirement 5 in the draft DCO (document reference TR020002/APP/2.1).
ANON-7B79-UB3Y-C	12 January 2018	Concerned about increases in pollution.	N	The air quality effects resulting from the Proposed Development have been assessed in Chapter 6: Air Quality of the ES (document reference TR020002/APP/5.2-1). The assessment shows that air quality will remain comfortably within legal limits. These legal limits are themselves based on World Health Organization guidance on health effects, allowing for the most vulnerable members of society. The air quality impacts of the airport are small and confined to the vicinity of the airfield and certain major roads. The impact of air quality on wildlife, ecosystems and biodiversity is assessed in Chapter 7: Biodiversity of the ES (document reference TR020002/APP/5.2-1) and is shown to be not significant.
		Concerns relating to noise of night flights and potential issues sleeping, stress, and loss of quality of life.	N	The Health Impact Assessment, Appendix 15.1 of the ES (document reference TR020002/APP/5.2-13) assesses the potential health impacts associated with changes in noise and air pollution. Where adverse effects are predicted, measures to mitigate these are set out in the Noise Mitigation Plan (document reference TR020002/APP/2.4). No significant effect on sleep disturbance is predicted due to the anticipated low number and noise of night-time flights. The potential noise effects resulting from the Proposed Development have been assessed in Chapter 12: Noise of the ES (document reference TR020002/APP/5.2-1). A summary of the significant residual effects is provided at

				Section 12.10. Based on this assessment, RiverOak has developed a Noise Mitigation Plan to reduce noise effects (document reference TR020002/APP/2.4) . The impact of noise on wildlife, ecosystems and biodiversity is assessed in Chapter 7: Biodiversity of the ES (document reference TR020002/APP/5.2-1) .
		Reduction in value of home as it is directly under flight path.	N	RiverOak will compensate landowners who can show that their properties have lessened in value due to the construction or operation of the Proposed Development when they come to sell them according to the national compensation code.
ANON-7B79-UB75-C	12 January 2018	Concerned with number of night flights and the consequential noise.	N	RiverOak is proposing a night time policy which imposes movement limits combined with measures to reduce noise. Further information can be found in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4) .
		Questions the viability of airport without night flights.	N	RiverOak are intending to have limited night flights, subject to an annual Quota Count according to their noise emissions, which has been reduced by nearly 50% since the consultation.
ANON-7B79-UBBN-G	12 January 2018	Supportive of the proposals.	N	RiverOak notes and welcome this response.
		Has faith that future issues that may occur will be addressed.	N	RiverOak notes and welcome this response.
		Supportive of the proposals.	N	RiverOak notes and welcomes this response.

ANON-7B79-UBC5-R	12 January 2018	The environmental assessments show that RiverOak is thinking of others.	N	RiverOak notes and welcomes this response. A full environmental impact assessment has been carried out which has identified both the potential benefits and impacts of the Proposed Development. This is set out in full detail in the ES (document reference TR020002/APP/5.2-1 – 5.2-15).
		Recognises that others may take issue with noise and noise mitigation is therefore positive.	N	RiverOak also recognises this. The potential noise effects resulting from the Proposed Development have been assessed in Chapter 12: Noise of the ES (document reference TR020002/APP/5.2-1). A summary of the significant residual effects is provided at Section 12.10. Based on this assessment, RiverOak has developed a Noise Mitigation Plan to reduce noise effects (document reference TR020002/APP/2.4). The impact of noise on wildlife, ecosystems and biodiversity is assessed in Chapter 7: Biodiversity of the ES (document reference TR020002/APP/5.2-1).
		Believes that the airport has the potential to become a successful engineering/freight/maintenance hub.	N	RiverOak notes this response.
ANON-7B79-UBCX-U	12 January 2018	Opposed to the proposals.	N	RiverOak notes this response but disagrees.
		The scale of the Proposed Development is too large and local infrastructure will not be able to cope.	N	RiverOak agrees that certain improvements will need to be made to the infrastructure. A Transport Assessment (document reference TR020002/APP/5.2-15) has been carried out and is reported on in Chapter 14 of the ES (document TR020002/APP/5.2-2). This assesses, amongst other things, operational junction capacity and puts forward suggestions for mitigating against impacts.

				<p>As part of the Transport Assessment detailed junction models for 28 local junctions as well as all the access junctions to the site have been prepared to inform where junction mitigation proposals may be required.</p> <p>The junctions modelled include junctions in Broadstairs, Margate, Ramsgate and Manston, key A299 junctions and many others and include the key junctions along Spitfire Way.</p>
		There are problems with the business case as there are two alternative airports for companies to ship goods to.	N	<p>As set out in the Azimuth Report (document reference TR020002/APP/7.4), the demand for air freight is set to increase by more than 50% across the period 2015 to 2035. London's six airports - Heathrow, Gatwick, Stansted, Luton, London City and Southend - facilitate approximately 76% of the UK's air freight. However, the Airports Commission report shows that all London airports will be at capacity by 2030. Therefore, the Proposed Development will not take freight away from other UK based airports but instead will help meet air freight capacity requirements.</p>
		There will be an increase in pollution from the aircraft as well as the additional cars and lorries. Such pollution poses a risk to health and the mortality rate in Ramsgate will worsen. The impact on health and noise has not been taken seriously enough.	N	<p>The air quality effects resulting from the Proposed Development have been assessed in Chapter 6: Air Quality of the ES (document reference TR020002/APP/5.2-1). The assessment shows that air quality will remain comfortably within legal limits. These legal limits are themselves based on World Health Organization guidance on health effects, allowing for the most vulnerable members of society. The air quality impacts of the airport are small and confined to the vicinity of the airfield and certain major roads. The impact of air quality on wildlife, ecosystems and biodiversity is assessed in Chapter 7: Biodiversity of the ES (document</p>

				reference TR020002/APP/5.2-1) and is shown to be not significant.
		Compensation for noise does not adequately cover enough properties. Contribution towards soundproofing costs is not enough to alleviate concerns.	N	RiverOak will follow the national compensation code, which compensates for loss of market value due to a project and is also offering £4000 for insulation to eligible properties
		The local area will suffer as people will leave due to the noise/disruption. Local tourism will suffer as planes will fly too low.	N	<p>The effects on tourism are discussed within Chapter 13: Socio-Economics of the ES (document reference TR020002/APP/5.2-2). Tourism receptors in the vicinity of the Proposed Development may experience effects resulting from the increased activity in the geographical area, in both construction and operational phases. For tourism businesses within the surrounding area, the increased visitor numbers associated with the airport operation, in conjunction with increased incomes from employees at Manston, will likely lead to increased demand for tourism facilities and associated spending in the locality. This could result in improvements to their volume of trade.</p> <p>In terms of indirect impacts, such as increased traffic, noise or dust, detailed assessments have been undertaken in Chapter 6: Air Quality, Chapter 12: Noise and Chapter 14: Traffic and Transport of the ES (document reference TR020002/APP/5.2-1 – 5.2-2). The negative effects on tourism are commonly observed to be related to noise and traffic.</p> <p>The effects of noise on tourist businesses will be minimal as the increase in urban areas will be small compared to existing sources. Aircraft noise will increase at the main beach in the centre of Ramsgate which is already subject to</p>

				<p>urban noise but there will be no noticeable noise increases at any other Kent beaches.</p> <p>Outside these areas the effects will depend on existing background levels but in general are considered sufficiently low not to affect the level of business activity or value. The site is well connected by road and rail and traffic increases are assessed to be minimal. The effects of traffic on tourism are considered to be low and will not affect the level of business activity or value.</p>
		The nature reserve on the edge of Cliffsend will be severely affected by increase in pollution and traffic.	N	This has been assessed and the impact is not believed to be significant
ANON-7B79-UBDR-P	12 January 2018	Believes that the proposals will lead to noise and air pollution issues.	N	<p>The air quality effects resulting from the Proposed Development have been assessed in Chapter 6: Air Quality of the ES (document reference TR020002/APP/5.2-1). The assessment shows that air quality will remain comfortably within legal limits. These legal limits are themselves based on World Health Organization guidance on health effects, allowing for the most vulnerable members of society. The air quality impacts of the airport are small and confined to the vicinity of the airfield and certain major roads. The impact of air quality on wildlife, ecosystems and biodiversity is assessed in Chapter 7: Biodiversity of the ES (document reference TR020002/APP/5.2-1) and is shown to be not significant.</p> <p>The potential noise effects resulting from the Proposed Development have been assessed in Chapter 12: Noise of the ES (document reference TR020002/APP/5.2-1). A summary of the significant residual effects is provided at</p>

				Section 12.10. Based on this assessment, RiverOak has developed a Noise Mitigation Plan to reduce noise effects (document reference TR020002/APP/2.4) . The impact of noise on wildlife, ecosystems and biodiversity is assessed in Chapter 7: Biodiversity of the ES (document reference TR020002/APP/5.2-1) .
		Concerned that night flights will be loud and disrupt sleep. Night time flights cause anxiety.	Y	RiverOak is proposing a night time policy which imposes movement limits combined with measures to reduce noise. Further information can be found in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4) .
		Unsure if £4,000 compensation will be adequate.	N	This is at least as much as is offered by other airports
		Concerned that the proposals may result in a devaluation in property value and unsure if compensation will be received for this.	N	RiverOak will compensate eligible landowners who can show that their properties have lessened in value due to the construction or operation of the airport when they come to sell them.
		Believes that the road system surrounding the property will need to be updated “considerably”.	N	A Transport Assessment (document reference TR020002/APP/5.2-15) has been carried out and is reported on in Chapter 14 of the ES (document TR020002/APP/5.2-2) . This assesses, amongst other things, operational junction capacity and puts forward suggestions for mitigating against impacts. As part of the Transport Assessment detailed junction models for 28 local junctions as well as all the access junctions to the site have been prepared to inform where junction mitigation proposals may be required.

				The junctions modelled include junctions in Broadstairs, Margate, Ramsgate and Manston, key A299 junctions and many others and include the key junctions along Spitfire Way.
ANON-7B79-UBWT-B	12 January 2018	Generally supportive of the proposals.	N	RiverOak notes and welcomes this response.
		Needs night flights to be strictly controlled.	Y	RiverOak understands that some respondents have concerns around night flights and is therefore proposing a night time policy which imposes movement limits combined with measures to reduce noise. Further information can be found in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4).
		Believes that Thanet needs Manston airport to bring investment and growth back to the area.	N	RiverOak welcomes this response and agrees that the Proposed Development would bring economic prosperity to Thanet.
ANON-7B79-UBYD-W	12 January 2018	Supportive of the proposals.	N	RiverOak notes and welcomes this response.
		Believes that the airport will provide much needed employment and will be in great demand post-Brexit.	N	RiverOak notes this and agrees
15883	12 January 2018	Letters dated 11 October 2017 and 13 November 2017 are appended and form part of the response	N	RiverOak notes this comment.
		Regard should also be had to consultee's response to the first statutory consultation submitted by GVA on 23 July 2017	N	RiverOak notes this comment.

		Of the view that the proposal amounts to misuse of the PA 2008 which has no realistic prospect of meeting the tests in section 23	N	RiverOak notes this comment but disagrees.
		RiverOak has not demonstrated viability or availability of funding for delivery of the scheme	Y	A Funding Statement (document reference TR020002/APP/3.2) forms part of RiverOak's application submission.
		The most appropriate use of the site is for housing	N	RiverOak disagrees. As of January 2018, the Manston Airport site is no longer being promoted as a mixed use settlement for up to 2,500 new homes in the new draft Thanet Local Plan. Thanet District Council launched a 'Call For Sites' in February 2018 which invites anyone to submit details of a site that they consider suitable for development. This could include sites suitable for housing development which have not yet been considered by the Council that could absorb the 2,500 houses previously allocated at the airport. The Manston site is zoned for aviation use and reopening the airport will provide much needed employment opportunities in an area of relatively high deprivation. The Azimuth Report (document reference TR020002/APP/7.4) provides details of the case for reopening the airport in some depth and finds that there are no other airports that can be used to reduce the impact of UK airport capacity constraints on the freight market.
		Residential led development is supported by the evidence base for the emerging TDC Local Plan review process	N	We disagree. The 2017 draft local plan is not a material consideration as it was rejected by TDC in January 2018.

		Lack of clarity over what is proposed	N	RiverOak disagrees with this. Chapter 3 of the ES (document reference TR020002/APP/5.2-1) sets out a full description of the Proposed Development.
		Boundary of the proposal not consistently presented	N	The redline boundary has been consistent throughout the pre-application process. Only minor amendments have been made to it as a result of discussions with landowners and to rationalise the boundary as required.
		<u>PEIR</u> Off-site mitigation areas not identified on any of the boundary plans	N	Off-site mitigation will be provided if required before the development commences, pursuant to Requirement 8 of the DCO (document reference TR020002/APP/2.1). A site has been identified.
		<u>PEIR</u> No plan to indicate where land is proposed to be acquired and where only rights are sought. No meaningful attempt by RiverOak to acquire the land or rights voluntarily	N	The Land Plans (document reference TR020002/APP/4.2) identify the different classes of right that RiverOak seek to acquire over the site. RiverOak has approached the main site landowner, Stone Hill Park, on numerous occasions in the hope of acquiring the land voluntarily but these approaches have not been fruitful.
		<u>PEIR</u> Description of the new infrastructure is unclear. Not clear what is necessary to be able to deliver the increase in air transport movements	N	RiverOak disagrees with this. Chapter 3 of the ES (document reference TR020002/APP/5.2-1) sets out a full description of the Proposed Development.
		<u>Capability</u> S42 consultation letter talks about 19 new air cargo stands, Introduction to consultation document talks	N	RiverOak's NSIP justification document (document reference TR020002/APP/2.3) sets out RiverOak's case for

		<p>about “from four to 23”. Phasing plans show construction of one new stand and refurbishment of 3. Para 3.3.3 says “extension to accommodate an additional aircraft stand.” Refurbishment not mentioned. Consultation documents are confusing. RiverOak should be setting out capability in respect of number of air transport movements of cargo to show it satisfies the NSIP test in s23 of the PA 2008</p>		<p>why the Proposed Development satisfies the test set out in s.23 of the Planning Act 2008.</p> <p>RiverOak disagrees that its consultation documentation was confusing: the comments on the left all refer to the same development but have been taken out of context.</p>
		<p><u>Northern Grass</u></p> <p>Insufficient information regarding Northern Grass business development. Scale of development would be a major strategic development for Thanet and would require an EIA in its own right. Phasing plans do not include the business units development up to 119,000m2 or the construction works for the new fuel farm, these elements are not described in the construction phasing section of the PEIR (3.3.81-3.3.114). Lack of detail affects a number of assessments</p>	<p>N</p>	<p>The scale of development is set out, as are maximum heights and uses.</p>
		<p><u>PEIR: Northern Grass</u></p> <p>Numerous inconsistencies in the PEIR re scale of development which suggests under assessment.</p> <p>3.3.73- multiple business units of various sizes and layouts with approximate floorspace of 119,000sqm</p> <p>12.9.76- business units located in Northern Grass a mixture of B1, B2 and B8 business use classes and range from office blocks to cargo facilities with a total footprint of approx. 105,000m2.</p>	<p>N</p>	<p>These inconsistencies have been corrected.</p>

		14.1.2- over 100,000 sqm of aviation related business/industrial development on the Norther Grass area		
		<p><u>PEIR: Transport Chapter</u></p> <p>At pages 14-17 says mix of uses on Northern Grass is 25% B1, 75% B1 and references a zonal masterplan. Zonal masterplan not a part of the consultation</p>	N	The zones are shown on drawing NK018417-RPS-MSE-XX-DR-C-2089 (Airport Related Business Development) submitted as part of the masterplan (document reference TR020002/APP/7.1). The zones are also shown on the Works Plans (document reference TR020002/APP/4.4).
		No clear information on maximum number of flights that the airport would be capable of handling. Introduction to Consultation document acknowledges airports new capability figure is not the same as RSP's forecast usage but actual maximum capability figure is not assessed or consulted on. Fundamental missing information for this type of proposal and is required under s23 of the PA 2008 and to satisfy EIA Regulations 2017.	N	The NSIP Justification document (document reference TR020002/APP/2.3) addresses this concern.
		<p><u>Fuel farm</u></p> <p>Very little detail on the new fuel farm, not clear how much fuel will be stored at the facility or when the fuel farm works will take place. Has implications for public to understand number of fuel tanker movements. Not clear from the masterplan how fuel will move from the fuel farm to service the fuel farm.</p> <p>3.3.41 states fuel may be delivered by rail but no information given despite lack of proximity to any rail terminal.</p>	Y	<p>The Transport Assessment (document reference TR020002/APP/5.2-15) sets out the fuel farm traffic movement in detail.</p> <p>No deliveries by rail has been assessed and all movements are proposed by HGVs. This has been amended accordingly in the ES within Chapter 3 Description of the Proposed Development, at paragraph 3.3.41 (document reference TR020002/APP/5.2-1).</p>

	<p><u>PEIR: Night flights and noise mitigation plan</u></p> <p>Information on night flights unclear and contradicts what RiverOak have previously said. Noise mitigation caps would allow far more night flights than have been assessed in the PEIR and would allow for higher than Luton and almost as high as for Heathrow). PEIR shows average of 7.1 flights per night the quota system would allow significantly more to operate without constraint and this has not been properly assessed. Inconsistency means public are being misled on highly contentious issue. The public have not been made aware of the actual night time proposals.</p>	Y	<p>RiverOak is proposing a night time policy which imposes movement limits combined with measures to reduce noise. Further information can be found in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4).</p> <p>A draft Noise Mitigation Plan (Appendix 41) formed part of the 2018 statutory consultation documentation and has been amended in response to the comments received, including cutting the Quota Count by nearly 50%.</p>
	<p><u>Consultation</u></p> <p>Consultation materials do not give information on masterplan design principles, how the proposed masterplan layout has responded to EIA inputs, consultation feedback or how it has considered security by design. Limited information on key mitigation measures. Surprising that the public has not been offered opportunity to comment on these aspects.</p>	N	<p>RiverOak disagrees with this comment. The 2018 PEIR set out a number of mitigation proposals and statutory consultees and the public were given every opportunity comment on them; indeed many people did, as is evidenced in this Report.</p> <p>The Design and Access Statement, setting out further design principles, was not available for consultation but this is not unusual for a project of this nature. The Design and Access Statement (document reference TR020002/7.3) is, however, provided as part of the DCO application submission.</p>
	<p><u>Fuel Farm</u></p> <p>No reference to the public safety zone, which could be extensive with 17,171 cargo aircraft movements and may require acquisition and demolition of properties.</p>	N	<p>RiverOak maintains its approach is sufficient.</p>

		Proposed fuel farm may be within the outer zone of the public safety zone which would not be permitted. What is public safety zone for total number of ATM's and does this require acquisition and demolition of properties		
		No consideration of overflying populated areas which should be assessed on a worst-case scenario. RiverOak should demonstrate that proposed departure routes are capable of being flown by larger, heavily laden freight aircraft. Not sufficient to say that no appraisal can be made until CAA grants a licence	N	Flight path route swathes have been assessed.
		<u>Section 23</u> Have previously sought clarification on how it meets the thresholds in s23. RiverOak fails to understand the difference between capacity and capability. Explanations do not adequately explain how airport has zero capability. This is illogical considering the site has a lawful use as an airport, it previously operated as a cargo airport, it has stands capable of parking between 4 and 7 aircraft simultaneously and RiverOak places great emphasis on benefits of re-using existing infrastructure. SHP could re-open the airport without a new planning permission. The case that the proposal is an NSIP has not been made out.	N	The NSIP Justification document (document reference TR020002/APP/2.3) addresses this concern.
		<u>Section 23</u> Year 20 air transport movements assessed in the PEIR is for 17,171 total freight ATMS. This does not	N	The NSIP Justification document (document reference TR020002/APP/2.3) addresses this concern.

		represent an increase of at least 10,000 ATM's over the existing capability of the airport. No alternative 'capability' figure has been provided by RiverOak with accompanying justification and evidence. The only figure has been provided by SHP through York Aviation.		
		<p><u>Associated development</u></p> <p>Concerns raised over what which elements are NSIP and which associated development have not been addressed. No explanation of how associated development uses can properly be said to meet the tests in the DCLG guidance.</p> <p>12.9.76 of the PEIR acknowledges precise layout unknown at this stage which means that no assessment has been carried out.</p> <p>Failure to provide justification means cannot ascertain why RiverOak needs the extent of the land they are seeking to acquire. SHP severely prejudiced as a result.</p>	N	RiverOak disagrees that this consultee has been prejudiced in any way as a result of not having this. A justification for NSIP and associated development is provided in the NSIP Justification document t(document reference TR020002/APP/2.3)
		<p><u>Business case</u></p> <p>The Azimuth report continues to place reliance on work carried out by York Aviation. This is clearly inappropriate. RiverOak should not continue to invite consultees to place reliance on work built around incorrect interpretation. It would be unsound to SoS to place reliance on forecasts by Azimuth when they are built upon misrepresentation of the work of others.</p>	N	The work carried out by York Aviation is not used to produce forecasts for Manston Airport. It is, however, used to illustrate the potential airport capacity constraints that may occur by 2050. The work by York Aviation is only a small part of the body of literature presented in the Azimuth Report (document reference TR020002/APP/7.4). It should be noted that RiverOak did have a conversation between themselves, Azimuth and York Aviation confirming the use of York's report in the Azimuth Report.

	<p><u>Business case</u></p> <p>Almost all of the evidence presented by Azimuth highlight need for more capacity in the South East relates to need for more airport capacity to meet growing passenger demand for flights fed by hub connecting services at Heathrow</p>	N	Capacity constraints at the UK's airports affect both passenger and freighter flights. Indeed, constraints may impact air freighters more than passenger flights since airports tend to preference passengers over cargo. This is explained in the Azimuth Report (document reference TR020002/APP/7.4).
	<p><u>Business case</u></p> <p>Revised report does not take into account latest DfT UK Aviation Forecast which considers freighter movements and forecasts there will be no growth in pure freighter aircraft movements across all UK airports. This has not been addressed in the PEIR</p>	N	The DfT's forecast for freighter movements is dealt with in the Azimuth Report (document reference TR020002/APP/7.4). RPS and Azimuth met with the DfT on the 25 January 2018 to discuss the issue. A letter was subsequently sent by Azimuth to the DfT explaining the reasons why it is believed that the zero percent forecast increase in freighter flights is not in line with industry forecasts and unlikely to be correct, except if this is based on the realisation that capacity constraints are seriously impacting the freighter market. A response from the DfT has been promised shortly.
	<p>PEIR; Noise Chapter and business case</p> <p>Fleet mix assessed in the noise Chapter is not the same as that presented in the Azimuth report.</p>	Y	These are now consistent.
	<p><u>Business case</u></p> <p>Azimuth report refers to a peer review of the forecasting methodology having been carried out by Loughborough university but the review has not been published</p>	N	The review was carried out by Loughborough University. It is not usual for peer reviews to be published and RiverOak does not see the need for a departure from that standard in this instance.

	<p><u>Business case</u></p> <p>Socio-economic analysis in vol. IV (3.4) continues to rely on York aviation study from 2004 which is not an appropriate source of data as being representative of the position in 2017/18 being 13 years out of date</p>	N	The Azimuth Report (document reference TR020002/APP/7.4) details the formulae used to calculate job forecasts. Analysis of the available formulae and comparator airports is extensive. Indeed the final figures have been revised in line with responses to the consultations.
	<p><u>Business case</u></p> <p>Employment forecasts in section 4.3 rely on work for Luton airport by Oxford Economics to justify assertion that onsite employment will be taken up by local residents. This is not justified by the data and there is no evidence to show that employment at the airport would be taken up by residents of Thanet</p>	N	The work on Luton Airport shows the location of airport employees, which for direct jobs were all resident in the immediate Luton area. However, the key to ensuring local residents have access to the wide range of employment opportunities that would be created by the airport, is in the provision and take up of training and education. To this end, RiverOak have committed to working with local providers of Higher and Further Education to ensure relevant courses are available to local people.
	<p><u>Business case</u></p> <p>New section on tourism does not provide a robust evidence base to attribute the role of the airport in any claimed increase in catalytic effect on inbound tourism in the area surrounding Manston airport.</p>	N	The Azimuth Report (document reference TR020002/APP/7.4) considered three comparator towns by which to assess the likely impact of Manston Airport on tourism. Southend-on-Sea, Southampton and Bournemouth were selected, as they are located in coastal areas in the South East of the UK. Other coastal towns with airports such as Newquay and the Scottish Islands were ruled out as they are relatively remote and clearly benefit from the connectivity an airport brings. The three benchmark towns all showed increased tourism with no negative impacts recorded. The impact on tourism is also considered in Chapter 13 of the ES (document reference TR020002/APP/5.2-2).
	<p><u>Business case</u></p>	N	The Azimuth Report (document reference TR020002/APP/7.4) provides a detailed case for the

		There is no supporting evidence base for the proposal, nor forecasting which in turn means no need case and no justification for compulsory acquisition		reopening of the airport. It is clear that the UK needs additional airport capacity. The evidence shows that air freight is particularly vulnerable to capacity constraints not only in the UK but also in Europe (see the Schiphol Airport example). Manston Airport zoned for aviation use, can provide some of the much-needed capacity almost immediately. RiverOak's planned investment in the airport would provide state-of-the-art facilities for freight, addressing many of the current difficulties experienced by freighter operators.
		<u>Compulsory acquisition</u> Concerns raised in 11 October 2017 letter regarding lack of any case for compulsory acquisition not addressed. No land plans showing limits of land required and rights has been supplied.	N	The Statement of Reasons (document reference TR020002/APP/3.1) sets out RiverOak's case for compulsory acquisition and the Land Plans (document reference TR020002/APP/4.2) show the extent over which different land rights are sought.
		<u>Compulsory acquisition</u> No appraisal of alternative sites has been supplied to demonstrate suitability of the site.	N	RiverOak disagrees with this statement. Alternative sites were appraised in Chapter 2 of the 2018 PEIR and in the Azimuth Report published for the 2018 statutory consultation.
		<u>Compulsory acquisition</u> 3.3.241 states Northern Grass will be used to relocate other airport businesses who don't need airside access. No consideration has been given to alternatives to compulsory acquisition to accommodate these businesses and no case has been made for need to accommodate them on land acquired compulsorily. Existing displaced occupiers could relocate to the existing vacant business park	N	The Statement of Reasons (document reference TR020002/APP/3.1) sets out RiverOak's case for compulsory acquisition.

	<p>nearby. This point was made by RiverOak in para 6.2 of the appeal statement lodged against temporary change of use</p>		
	<p><u>Compulsory acquisition</u></p> <p>RSP has issued just one letter to the consultee dated 9 February 2018 in which RiverOak sought to discuss voluntary acquisition of the land. Astonishing that first contact made by RiverOak has not occurred until now. This consultee has not received any proper proposal backed by a valuation.</p>		<p>RiverOak disagrees with this characterisation of events. An offer was made for the site in 2016 and principals have been in intermitted discussion since then, including as recently as 27 March 2018.</p>
	<p>Inappropriate reliance of powers in s172 of the Housing and Planning Act 2016 and has sought to avoid the safeguards in s53 of the PA 2008</p>	N	<p>RiverOak has made attempts to access land under s.53 of the PA 2008: the first of these was successful, the second did not need to be used, and the third is ongoing. RiverOak disagrees that the use of s.172 is inappropriate and will pursue this route if it considers it appropriate to do so.</p>
	<p><u>Identity of the applicant</u></p> <p>PEIR refers to EIA scoping as having been undertaken by RiverOak which is incorrect</p>	Y	<p>The ES has been amended to reflect this.</p>
	<p><u>PEIR</u></p> <p>RSP could not benefit from the transitional provisions in the EIA Regulations 2017.</p>	N	<p>RiverOak disagrees with this statement, however, in order to ensure there is no ambiguity, it has carried out its Stage 3 Consultation in compliance with the 2017 EIA Regulations.</p>
	<p><u>PEIR</u></p> <p>Requirements of EIA Regulations 2017 not satisfied: No information on likely significant effects during decommissioning (ignoring the scoping opinion);</p>	N	<p>RiverOak is confident that it has complied with all legal requirements, including the 2017 EIA Regulations.</p> <p>Decommissioning is not considered in the ES as it is expected that the airfield would operate in perpetuity.</p>

	<p>No information on human health and climate</p> <p>No cumulative effects assessment with other Proposed Developments or from impact on climate/climate change</p> <p>No information on proposed monitoring arrangements</p> <p>No description of expected significant adverse effects resulting from risk of major accidents and/or disasters.</p> <p>The consultation has been undertaken prematurely for these reasons. No assessment on risks to human health, or of effects of major accidents or effects on climate change</p>		<p>Cumulative effects assessment are considered in the ES within Chapter 18: Cumulative Effects.</p> <p>Significant effects have been assessed for inclusion in the ES for human health, climate change and major accidents. The assessment has been undertaken and can be located within Chapter 17: Major Accidents and Disasters, Chapter 15 Health and Wellbeing and Chapter 16 Climate Change of the ES (document reference TR020002/APP/5.2-2 and 5.2-3).</p>
	<p><u>PEIR: Air Quality</u></p> <p>Emissions from road traffic have not been robustly assessed, very little information to explain how traffic modelling has been taken into account. Need to give proper consideration to impacts as a result of airside sources and traffic impacts over the wider area. Spatial scope of the modelling not clear.</p>	N	<p>Road traffic has been modelled using a standard approach. Combined effects from on-airport sources and road traffic have been assessed as having a non-negligible contribution from both. This is covered in Chapter 6 Air Quality of the ES (document reference TR020002/APP/5.2-1).</p>
	<p><u>PEIR: Air Quality</u></p> <p>Latest emissions factors (v.8) not used</p>	N	<p>Version 8 of the Emissions Factors Toolkit was not issued until December 2017, after the modelling work was completed. The modelling work used EFT v7 uplifted by CURED, which gives good agreement with real-world emissions.</p>

	<p><u>PEIR: Air Quality</u></p> <p>Impacts on Pegwell Bay should not be ruled out of further assessment.</p>	N	EA and IAQM guidance was used to decide which impacts can be scoped out.
	<p><u>PEIR: Ecology</u></p> <p>Conclusion of No Significant Effects Report is premature given high level of the PEIR document without complete data from surveys or traffic modelling, air quality assessments</p>	Y	The contribution of road traffic to the air quality modelling has now been included in the assessment and can be found in the Habitats Regulations Assessment, included as Appendix 7.1 of Chapter 7 Biodiversity of the ES (document reference TR020002/APP/5.2-6).
	<p><u>PEIR: Ecology</u></p> <p>Treatment of operational effects including key issues such as bird strike is not existent</p>	N	In terms of biodiversity, significant adverse impacts from birdstrike would only be expected if it involved sufficient numbers of birds of species that are qualification/ notified features of the designated sites. This aspect is covered in ES Chapter 7 and its associated appendices (document reference TR020002/APP/5.2-1).
	<p><u>PEIR: Ecology</u></p> <p>No evidence as to how small area of compensation land located close to the site will effectively mitigate the effects on noise and disturbance</p>	N	The off-site mitigation area will be of higher quality and assessment is included in the ES (document reference TR020002/APP/5.2-1) and will be managed specifically for the wildlife impacted on the Proposed Development site (Chapter 7: Biodiversity of the ES (document reference TR020002/APP/5.2-1)).
	<p><u>PEIR: Ecology</u></p> <p>PEIR references off site habitat creation at parcel 1362 but the land is not included in the boundary plans for the proposals</p>	N	The offsite mitigation land is not part of the application but a site has been identified for it.

		<p><u>PEIR: Archaeology</u></p> <p>Discussion over which historic buildings are to be retained and which demolished lacking in detail and no plans to show which assets are to be retained on the site</p>	N	<p>Unsuccessful efforts have been made thus far to gain access to the site to carry out further detailed survey. Further survey is therefore proposed (Chapter 9: Historic Environment Section 9.9 of the ES (document reference TR020002/APP/5.2-1)) to identify the condition and potential for sustainable use, the scope of which will be discussed with KCC, TDC and Historic England</p> <p>Contingency planning for incorporation of built heritage assets by design can only be discussed in principle at this stage and is reflected by the flexibility inherent in outline masterplanning. For this reason, the assessment presented in Chapter 9 of the ES (document reference TR020002/APP/5.2-1) provides a 'worst-case' scenario (see also Chapter 5: Approach to the ES, paragraphs 5.4.15-5.4.20).</p>
		<p><u>PEIR: Archaeology</u></p> <p>Should provide information on significance of effects on designated heritage assets within 60dB noise contour</p>	N	<p>A more detailed noise assessment is set out at Section 9.7 in Chapter 9 of the ES (document reference TR020002/APP/5.2-1) and in the archaeological desk based assessment (Appendix 9.1, document reference TR020002/APP/5.2-8 and 5.2-9). Appendix E of the desk based assessment includes a list of heritage assets, with discussion of their sensitivity to noise effects and their present context.</p>
		<p><u>PEIR: LVIA</u></p> <p>Choice of 5km study area not explained. Methodology does not make clear how the effects of introduction of aircraft in flight have been assessed.</p>	N	<p>The rationale for the definition of the LVIA study area is set out in paragraph 11.3.2 of Chapter 11 Landscape and Visual of the ES (document reference TR020002/APP/5.2-2) and is in accordance with the principle of proportionality set out in paragraph 3.16 of GLVIA 3.</p>

				The scope of the assessment with regard to aircraft in flight is set out in 11.6.15 and 11.6.16 of Chapter 11.
		<u>PEIR: LVIA</u> Photographic survey undertaken when trees still in partial leaf which does not represent the greatest extent of potential visibility.		As stated in paragraph 11.7.24 of Chapter 11 of the ES (document reference TR020002/APP/5.2-2), the viewpoint analysis considers seasonally reduced leaf cover and is included in Appendix 11.3 .
		<u>PEIR: LVIA</u> No information on what planting will comprise.	N	Detailed specification of screen planting will be agreed post-consent. This is committed to through requirement 10 of the draft DCO.
		<u>PEIR: LVIA</u> Unclear what images in the PEIR are verified and no methodology on the verification method	N	All the photowire images provided in Appendix 11.1 of Chapter 11 Landscape and Visual of the ES (document reference TR020002/APP/5.2-2) are verified.
		<u>PEIR: LVIA</u> No lighting assessment in the PEIR		An outline lighting scheme has been prepared for the Proposed Development and this is summarised in Chapter 3 of the Environmental Statement (document reference TR020002/APP/5.2-1). This information has allowed an understanding of the likely lighting effects to be included within Landscape and Visual Assessment set out in Chapter 11 of the ES and as the detailed design process moves forward additional information will be provided and the information contained here will be confirmed through more detailed modelling of the lighting conditions at specific receptors. The airport lighting has been designed to achieve compliance with the International Commission on Illumination (CIE) Guide: CIE 150:2003 Guide on the Limitation of the Effects of Obtrusive Light from Outdoor

				Lighting Installations for Environmental Zone E2:Rural Low district brightness - Village or relatively dark outer suburban locations. Based on those principles and with particular note to the boundary lighting condition of 1 Lux (maximum), it is not expected that there would be any significant effects as a result of the Proposed Development.
		<u>PEIR: LVIA</u> Tranquillity not considered in its own right and a blanket assumption has been made as to effects of overflying	N	Tranquillity is considered in its own right in Chapter 11 Landscape and Visual, paragraphs 11.4.39-11.4.41 of the ES (document reference TR020002/APP/5.2-1). Tranquillity is explicitly referred to as a key factor in the LCA sensitivity assessments provided in Appendix 11.2 of the ES (document reference TR020002/APP/5.2-13) and in the impact assessments for the LCAs provided in Tables 11.20-11.33 of Chapter 11 of the ES. Tables 11.20- 11.33 of the ES also include specific reference to the effects of overflying.
		<u>PEIR: LVIA</u> Landscape mitigation proposals are not properly described	N	Detailed specification of screen planting will be agreed post-consent. This is committed to through Requirement 10 of the draft DCO (document reference TR020002/APP/2.1).
		<u>PEIR: Noise</u> Noise assessment not adequately assessing overall effect of all elements of the proposal	N	The potential noise effects resulting from all elements of the Proposed Development have been assessed in Chapter 12: Noise of the ES (document reference TR020002/APP/5.2-1). A summary of the significant residual effects is provided at Section 12.10. Based on this assessment, RiverOak has developed a Noise Mitigation Plan to reduce noise effects (document reference TR020002/APP/2.4). The impact of noise on wildlife, ecosystems and biodiversity is assessed in

				Chapter 7: Biodiversity of the ES (document reference TR020002/APP/5.2-1).
		<p><u>PEIR: Noise</u></p> <p>Assumptions made on noise do not assess worst case scenario of flights operating at night up to quota limits</p>		<p>The application version of the Noise Mitigation Plan (document reference TR020002/APP/2.4) has a reduced night time quota of 3028. The quota has been reduced in response to consultation responses received during the 2018 statutory consultation and also as RiverOak has further refined their expectations of the aircraft fleet that is expected to use the airport. The night noise quota set in the noise mitigation plan is entirely consistent with the worst-case scenario assessed in the ES (document reference TR020002/APP/5.2).</p>
		<p><u>PEIR: Noise</u></p> <p>Mitigation for noise sensitive facilities is insulation, however, no assessment of impact on outside space.</p>	N	<p>The 2018 PEIR has assessed noise impacts on outside space in the assessment of community receptors in Section 12.17 of Chapter 12.</p> <p>The assessment of noise impacts on those in outside space is contained in section 12.7 of Chapter 12 of the ES (document reference TR020002/APP/5.2-2). There are measures contained in the Noise Mitigation Plan (document reference TR020002/APP/2.4), for instance the ban on non-Manston based training flights, the use of runway preference, and the encouragement of the use of low power/low drag configurations which will reduce the noise impact on those outside of buildings. Other measures to mitigate noise will also be included in the Construction Environmental Management Plan and Operational Environmental Management plans, both of which are secured through requirements in the draft DCO (document reference TR020002/APP/2.1).</p>

	<p><u>PEIR: Noise</u></p> <p>Noise Mitigation Plan references a relocation policy for residential occupiers whose properties would be adversely affected by noise but the policy has not been published</p>	Y	<p>The relocation policy is included at paragraph 4 of the Noise Mitigation Plan (document reference TR020002/APP/2.4). This policy is compliant with Government guidance and compares with similar schemes offered at other UK airports.</p>
	<p><u>PEIR: Noise</u></p> <p>Not clear from the PEIR how many properties would fall between LOAEL and SOAEL where significant adverse effects could be experienced. Cannot be the case that properties experiencing SOAEL are the only properties that will experience significant adverse effects.</p>	Y	<p>In response to comments received throughout consultation on the 2018 PEIR, the figures supporting the noise Chapter have been updated to allow clearer identification of receptors falling within the UAEL, SOAEL and LOAEL thresholds for significance. These updated figures form part of the noise assessment reported in Chapter 12 of the ES (document reference TR020002/APP/5.2-2).</p>
	<p><u>PEIR: Noise</u></p> <p>No breakdown between noise effects attributable to airport proposal and noise attributable to associated development and traffic noise associated with each element</p>		<p>Section 12.7 of Chapter 12 of the ES (document reference TR020002/APP/5.2-2) separates and describes noise effects according to the noise or vibration source to which they are attributable as follows:</p> <ul style="list-style-type: none"> • Construction Noise – Earthworks, Fixed and Mobile Plant; • Construction Vibration – Earthworks and Fixed Mobile Plant; • Construction Noise – Road Traffic • Aircraft Noise (aircraft air and airside ground noise including mobile and static sources of noise); • Operational Noise – Road Traffic; and • Operational Noise – Associated Development;
	<p><u>PEIR: Socio-economic</u></p>	N	<p>RiverOak maintains its approach is sufficient.</p>

		PEIR assumes no significant change to baseline. Assumption is not robust and fails to take account of population growth and predicted background economic growth.		
		<u>PEIR: Socio-economic</u> Proportion of workers to be sourced from immediately surrounding communities highly optimistic. If workers are likely to need to move to the area this is not accurately assessed. Azimuth reference construction workers staying in local hotels, which is inconsistent.	N	Education and training are key to ensuring local people have the ability to gain employment at the airport and in aviation-related businesses on-site or located nearby. To this end, RiverOak will work with local providers to ensure a range of appropriate training and education opportunities are available in East Kent.
		<u>PEIR: Socio-economic</u> Shortage of information relating to effect of proposal on educational and community facilities.	N	RiverOak disagrees that there is a shortage of information. This is discussed within Chapter 13 of the ES (document reference TR020002/APP/5.2-2).
		<u>PEIR: Socio-economic</u> Case for tourism benefits arising from a primarily freight focussed airport are unclear	N	The effects on tourism are discussed within Chapter 13: Socio-Economics of the ES (document reference TR020002/APP/5.2-2). Tourism receptors in the vicinity of the Proposed Development may experience effects resulting from the increased activity in the geographical area, in both construction and operational phases. For tourism businesses within the surrounding area, the increased visitor numbers associated with the airport operation, in conjunction with increased incomes from employees at Manston, will likely lead to increased demand for tourism facilities and associated spending in the locality. This could result in improvements to their volume of trade.
		<u>PEIR: Socio-economic</u>	N	The issue of housing is considered in Appendix 6 of the Planning Statement (document reference

		No assessment made of job creation and impact on TDC's objectively assessed housing need. Where would increase in housing land requirements be located? How would countryside be affected? Would there be a deficiency in infrastructure?		TR020002/APP/7.2). This shows that the potential for immigration directly related to the employment opportunities associated with the airport is nil and therefore there will be no requirement for additional homes in the study area by 2039 to meet the forecast employment needs of the airport. The Manston site is zoned for aviation use and reopening the airport will provide much needed employment opportunities in an area of relatively high deprivation. The Azimuth Report (document reference TR020002/APP/7.4) provides details of the case for reopening the airport in some depth and finds that there are no other airports that can be used to reduce the impact of UK airport capacity constraints on the freight market.
		<u>PEIR: Socio-economic</u> Assessment does not reflect fact that need case based on taking freight away from other UK airports. Effect of diversion of trade should be assessed	N	As set out in the Azimuth Report (document reference TR020002/APP/7.4), the demand for air freight is set to increase by more than 50% across the period 2015 to 2035. London's six airports - Heathrow, Gatwick, Stansted, Luton, London City and Southend - facilitate approximately 76% of the UK's air freight. However, the Airports Commission report shows that all London airports will be at capacity by 2030. Therefore, the Proposed Development will not take freight away from other UK based airports but instead will help meet air freight capacity requirements.
		<u>PEIR: Traffic</u> Use of a spreadsheet model to assess impacts is inappropriate for this scale of development. A Strategic model should be used.	N	Since this comment was made, a formal request to use the model has been made and a detailed scoping/methodology note will be provided to KCC following the submission of this DCO. RiverOak remains committed to additional strategic traffic and transport modelling in conjunction with KCC to

				agree a set of proposals that will be required to allow development of the airport to come forward.
		<u>PEIR: Traffic</u> RSP acknowledges traffic counts underpinning the spreadsheet model have issues, including inaccurate traffic counts. Without a recount of the traffic data the robustness of the exercise is undermined. RiverOak acknowledges this limitation at 14.1.1. New traffic counts should be provided and consulted on.	Y	The issues with the traffic counts underpinning the traffic and transport assessment work are addressed via other traffic data sources and do not present a material risk to the Proposed Development assessments. Full data sets of the traffic counts are provided in Appendix C of the Transport Assessment (document reference TR020002/APP/5.2-15).
		<u>PEIR: Traffic</u> Scope of study inappropriate and does not consider effects on Highways England network.	Y	Chapter 8 of the Transport Assessment (document reference TR020002/APP/5.2-15) is an assessment of the impacts on the Highways England network as far wide as the M25 and M20. The scope of this assessment was discussed with Highways England.
		<u>PEIR: Traffic</u> Significant weight placed on Transport Assessment but not supplied	Y	A Transport Assessment (document reference TR020002/APP/5.2-15). Its conclusions do not differ to those reported in the 2018 PEIR.
		<u>PEIR: Traffic</u> No detail provided on types of mitigation required to achieve sustainable development, travel plans referenced but not supplied	Y	A Travel Plan (Appendix L of the Transport Assessment, document reference TR020002/APP/5.2-15) is provided to support the DCO application. This document details the types of mitigation proposed. The Airport Surface Access Strategy (Appendix O of the Transport Assessment) also sets out details of the proposed access to the site.
		<u>PEIR: Traffic</u> Strategic route enhancements being planned likely to need to come forward in order for sheer scale of	N	Details of the improvements to the access routes to the site, be that junction or link improvements are included within

		commercial development proposed. This is not included in the proposals which means RiverOak can't deliver it.		sections 7.8 and 9 of the Transport Assessment (document reference TR020002/APP/5.2-15).
		<u>PEIR: Traffic</u> Impact on wider KCC transport plan should be assessed	N	This wider impact has been considered within the Transport Assessment (document reference TR020002/APP/5.2-15), and considers the key strategic roads as well as important local roads around the whole of Thanet District. The scope of assessment matches that of the KCC Thanet strategic traffic model as was agreed with KCC.
		<u>PEIR: Traffic</u> No justification for the Northern Grass acquisition	N	RiverOak is not clear what is meant by this comment as it relates to the traffic assessment. RiverOak's case for compulsory acquisition of land and rights over land is contained in the Statement of Reasons (document reference TR020002/APP/3.1).
		<u>PEIR: Climate change</u> No assessment provided	Y	The 2018 PEIR included a Chapter that dealt with climate change assessment. This has been refined and is now Chapter 16: Climate Change of the ES (document reference TR020002/APP/5.2-2).
		<u>PEIR: Climate change</u> Only freshwater measures incorporated within design and would expect consideration to be given to a wider range of measures	Y	A wide range of measures is considered in Chapter 16: Climate Change of the ES (document reference TR020002/APP/5.2-2).
		<u>PEIR: Climate change</u> Design life of individual assets should be extended in the individual assessments as many are assumed to function beyond the 2050s	Y	A Climate Change Adaptation Strategy has been committed to, which will ensure the incorporation of climate change impacts in the design, construction and operation of the Proposed Development.

		<p><u>PEIR: Climate change</u></p> <p>Emissions associated with end of life decommissioning should at least be considered quantitatively</p>	Y	<p>Decommissioning is not considered within the ES (document reference TR020002/APP/5.2). This is due to the fact that it is envisaged that the Proposed Development will exist in perpetuity.</p>
		<p><u>PEIR: Climate change</u></p> <p>Full carbon footprint of the airport should be taken</p>	Y	<p>A carbon footprint is included within Chapter 16: Climate Change of the ES (document reference TR020002/APP/5.2-2).</p>
		<p><u>PEIR: Major accidents</u></p> <p>No assessment</p>	Y	<p>The assessment has been undertaken and can be located within Chapter 17: Major Accidents and Disasters of the ES (document reference TR020002/APP/5.2-3).</p>
		<p><u>PEIR: Major accidents</u></p> <p>Study area not wide enough in light of likely flight paths. Assessment should include realistic worst case scenario such as overflying most populated and most ecologically sensitive areas. Not acceptable to not to assess based on CAA flight process having not taken place yet</p>	Y	<p>The study area has been selected to capture all credible foreseeable events arising at the airport, including those with effects downstream of the airport drainage, and those within the design flight swathe. A robust and proportionate assessment has been made.</p> <p>RiverOak has assessed flight 'swathes' and local residents can be reassured that the flights will be kept to those swathes. Should the applied for DCO be granted, RiverOak will develop and submit an ACP to the CAA. Under the ACP, the CAA will expect the airport to develop proposals which seek to quantify and minimise environmental impact. The process includes a further round of environmental impact assessments and public consultation on the specific flightpaths being proposed. Proposed flightpaths will have to be within the proposed swathes; if RiverOak wishes to propose flightpaths which are beyond these then we will have to apply to amend the DCO to match them.</p>

		<p><u>PEIR: Major accidents</u></p> <p>No information on safeguarding zones around the airport</p> <p>What are the safeguarding zones what does increased risk profile look like for surrounding area of crashes, terrorist attack, cyber attack</p>	Y	<p>The assessment reported in Chapter 17 (document reference TR020002/APP/5.2-3), includes consideration of flight incidents, and malicious acts including terrorism.</p>
		<p><u>PEIR: Major accidents</u></p> <p>Sensitive land uses not identified e.g. schools, hospitals, residential institutions</p>	Y	<p>Vulnerable populations have been reviewed as part of the assessment in Chapter 17 of the ES (document reference TR020002/APP/5.2-3). A small number of sensitive land uses exist within the 1km study bound for land but are at distance from the development.</p> <p>Some vulnerable populations exist within the flight design swathe and have been proportionately taken account of in the assessment, alongside other public and residential populations. Risk to those in the flight swathe is extremely low.</p> <p>The assessment within Chapter 17 considers effects on general public population, airport users and airport workers/construction workers.</p>
		<p><u>PEIR: Major accidents</u></p> <p>Future baseline does not give consideration to population changes in the future</p>	Y	<p>Planned future developments are allowed for in the cumulative Chapter, which is Chapter 18 Cumulative Effects of the ES (document reference TR020002/APP/5.2-3).</p>
		<p><u>PEIR: Major accidents</u></p> <p>Incorporated measures only consider risks from fuel spillage. No commentary on security and resilience of the airport to other risks</p>	N	<p>Airport security and resilience is fundamental to EASA licensing. Relevant EASE and CAA guidelines will be followed including those of security.</p>

		<p><u>PEIR: Major accidents</u></p> <p>Lists of types of incidents omits key risks- plane crash, drone strike, bird strike, cyber attack</p>	Y	The 2018 PEIR presented a high level preliminary list which detailed the information that RiverOak had at the time of the 2018 consultation. Chapter 17 of the ES (document reference TR020002/APP/5.2-3) provides more refined detail and all of the items listed have now been assessed.
		<p><u>Appendix 7.1 No Significant Effects Report</u></p> <p>Cannot reach this conclusion given modelling work ongoing.</p>	Y	Modelling work for air quality and noise has now been completed, and included within the ES (document reference TR020002/APP/5.2-1 and 5.2-2). Appendix 7.1 (document reference TR020002/APP/5.2-6) is now titled the 'Report to Inform the Appropriate Assessment'.
		<p><u>Appendix 7.1 No Significant Effects Report</u></p> <p>Would be prudent to prepare information in support of an appropriate assessment</p>	Y	Information to support appropriate assessment has now been provided within Appendix 7.1 (document reference TR020002/APP/5.2-6) .
		<p><u>Appendix 7.1 No Significant Effects Report</u></p> <p>Site plans only show main airport boundary and no offsite mitigation proposals or traffic mitigation having an effect over a wider area</p>	Y	This is addressed within Chapter 7 Biodiversity of the ES (document reference TR020002/APP/5.2-1).
		<p><u>PEIR</u></p> <p>Fundamental gaps in numerous areas of assessment</p>	Y	The 2017 and 2018 PEIRs provided initial information on potential environmental effects. This document has now been refined and updated with additional information to feed into the ES (document reference TR020002/APP/5.2-1 – 5.2-15). It is not considered that there are fundamental gaps in assessments within the ES and it is not considered that the 2017 or 2018 PEIRs were deficient.

		<p><u>Blight</u></p> <p>Not clear how those parties affected by blight relate to the proposal will qualify to access blight mitigation scheme. Not clear if can require purchase of property from confirmation of DCO, implementation or until operational.</p>	N	<p>Statutory blight will apply once the application is made, and RiverOak have set aside funds to meet any claims, although it is advised by CBRE that no landowners are eligible.</p>
		<p><u>Blight</u></p> <p>Failure to provide details of how proposals are funded and has the means to provide compensation</p>	N	<p>RiverOak's Funding Statement (document reference TR020002/APP/3.2) sets out details of how the Proposed Development will be funded.</p>
		<p><u>Consultation</u></p> <p>No information in SoCC or consultation materials as to how scope of cat 3 interests identified, concerns that a large number of interests have not been identified</p>	N	<p>This is not information that is generally provided at consultation stage. Such information can be found in the Book of Reference (document reference TR020002/APP/3.3).</p>
		<p><u>Consultation</u></p> <p>Number of s51 enquiries as to why large areas of residential population not consulted</p>	N	<p>RiverOak believes its consultation was sufficiently wide-ranging.</p>
		<p><u>Consultation</u></p> <p>Further consultation is required</p>	N	<p>RiverOak disagrees with this statement. All three stages of consultation have been carried out robustly, appropriately and in line with all legal requirements and suggested guidance.</p>
		<p><u>Consultation</u></p>	N	<p>RiverOak confirms that it has had regard to all consultation responses received during all three stages of statutory consultation. The regard had is set out in this Report.</p>

		Reminds RiverOak of duty to have regard to consultation responses if an application is submitted in March 2018		
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Table 10.5: Other organisational responses of note

Consultee	<u>Summary of Response</u>	Change? Y / N	Regard had to response
Keith Taylor, Green Party MEP for South East of England	<p><u>PEIR Chapter 6: Air Quality</u></p> <p>Takes issue with PEIR statement that PM10 and PM2.5 “are within legal limits across most of the country” as RiverOak fails to make clear almost 80% of towns and cities in the UK are breaching safe levels of PM pollution.</p>	N	<p>RiverOak is unable to identify the source of the assertion that almost 80% of towns and cities in the UK are breaching safe levels of PM pollution. Defra’s 2017 report “Air Pollution in the UK 2016” states:</p> <p><i>“All zones met the limit value for daily mean concentration of PM₁₀ particulate matter, without the need for subtraction of the contribution from natural sources.</i></p> <p><i>All zones met the limit value for annual mean concentration of PM₁₀ particulate matter, without the need for subtraction of the contribution from natural sources.</i></p> <p><i>All zones met the target value for annual mean concentration of PM_{2.5} particulate matter, the Stage 1 limit value, which came into force on 1st January 2015, and the Stage 2 limit value which must be met by 2020.”</i></p>

	<p><u>PEIR Chapter 6: Air Quality</u></p> <p>TDC currently do not undertake any monitoring of PM_{2.5}, any reference to it being within limits or not too severe is wrong. PM₁₀ is only being measured at 2 sites in Thanet, Birchington and Ramsgate. It beggars belief that RiverOak state that “Concentrations of PM10 and PM2.5 around the airport are low, and the airport will be a very small source of these pollutants.” There is not enough data to back up this claim.</p>	N	<p>Information on background levels of PM₁₀ and PM_{2.5} is taken from Defra mapping, as detailed in Section 6.5 of Chapter 6 of the ES and Appendix 6.2 (document reference TR020002/APP/5.2-1 and 5.2-6). Concentrations are well below legal limits even at the roadside sites where the two Thanet monitors are located. The modelling presented in the assessment shows that the contribution of the airport to PM concentrations is very low; this is consistent with the results of modelling and monitoring at other airports.</p>
	<p><u>PEIR Chapter 6: Air Quality</u></p> <p>Doesn't accept RiverOak's claim that there is “scientific uncertainty about the health effects of NO₂.”</p>	N	<p>This is a selective quotation. The sentence referred to says that there is more uncertainty about the health effects of NO₂ than there is about PM₁₀ and PM_{2.5}, which is true, because the health effects of PM₁₀ and PM_{2.5} are reasonably well understood. For example, the Committee on the Medical Effects of Air Pollutants are currently struggling to reach agreement about what the best mortality coefficient for NO₂ is.</p>
	<p><u>PEIR Chapter 6: Air Quality</u></p> <p>The claim that “NO_x is not believed to have impacts on human health” is at best deliberately misleading, at worst factually incorrect as NO_x is a generic term covering various nitrogen oxide air pollutants.</p>	N	<p>NO_x is the name used for the mix of nitrogen dioxide (NO₂) and nitric oxide (NO). Of these, NO₂ is believed to have health effects in humans, but NO is not. On the other hand, both NO₂ and NO are believed to have effects on plants. For these reasons, it is standard practice to treat NO₂ and NO_x as distinct (but related) pollutants, with regulations for the protection of human health written in terms of NO₂ and regulations for the protection of plants and ecosystems written in terms of NO_x.</p> <p>It was considered that the non-technical summary should not concern itself with an explanation of this distinction, but Chapter 6 addresses it in full (e.g. 6.4.26, 6.7.11 and Tables 6.7 and 6.8, and of course the presentation of the assessment results and</p>

			conclusions in Sections 6.8–6.11 and 6.14) (document reference TR020002/APP/5.2-1).
	<p><u>PEIR Chapter 14: Traffic</u></p> <p>It is not credible that the additional contribution to air pollution from the Proposed Development, including airport related traffic, is predicted to be small, slight, moderate or negligible. These plans would counteract urgent plans to tackle the current air quality emergency.</p>	N	The air pollution issue is not addressed in Chapter 14, but in Chapter 6, which discusses Air Quality (document reference TR020002/APP/5.2-1).
	<p><u>PEIR Chapter 16: Climate change</u></p> <p>Any airport expansion in the UK not compatible with meeting mandatory climate targets.</p>	N	The Revised Draft Airports National Policy Statement (NPS) addresses airport expansion in the UK and the extent to which that impacts mandatory climate targets. It states that any individual development should quantify its carbon impact, including mitigations. How the impact from the individual development is considered within wider aviation policy is a matter for the Secretary of State, as described in the Revised Draft Airports NPS.
	<p>Plan to increase air freight with connection to the local road network is incompatible with shift towards more sustainable, multi modal logistics chains in order to meet EU targets to shift 30% of long distance road freight to other modes by 2030. Cargo movements proposed would contribute to an increase in emissions that would put the achievement of these objectives in jeopardy.</p>	N	The development is compatible with the creation of Thanet Parkway Railway Station, and air quality impacts have been assessed as not being significant (ES Chapter 6 document reference TR020002/APP/5.2-1).
	<p><u>PEIR Chapter 12: Noise</u></p> <p>Noise is a particular concern given the proximity of the airport to several towns and villages. Housing</p>	N	The potential noise effects resulting from the Proposed Development have been assessed in Chapter 12: Noise of the ES (document reference TR020002/APP/5.2-1). A summary of the significant residual effects is provided at Section 12.10. Based on

	<p>in Manston village and Cliffsend close to runway and passenger terminal. Not credible that RiverOak expects to be able to overcome these obstacles.</p>		<p>this assessment, RiverOak has developed a Noise Mitigation Plan to reduce noise effects (document reference TR020002/APP/2.4). The impact of noise on wildlife, ecosystems and biodiversity is assessed in Chapter 7: Biodiversity of the ES (document reference TR020002/APP/5.2-1).</p>
	<p><u>PEIR Chapter 12: Noise</u> Operating a low power/low drag procedure subject to ATC speed control requirements and maintenance of safe operation don't go far enough</p>	<p>N</p>	<p>Operation of a low power/drag procedure is one of many proposals set out in the Noise Mitigation Plan (document reference TR020002/APP/2.4) to minimise the impact of noise on communities close to the airport.</p>
	<p><u>Business case</u> I have reason to believe that the benefits have been significantly overstated and the costs and impacts significantly understated</p>	<p>N</p>	<p>The economic benefits including job creation and training and education opportunities are detailed in the Azimuth Report (document reference TR020002/APP/7.4). Full details of how these calculations have been derived are provided in the reports. As a comparison, three other coastal towns with airports were considered to determine what the likely impact on tourism in Thanet and East Kent might be. The ES (document reference TR020002/APP/5.2-1 – 5.2-15) sets out the possible impacts of the Proposed Development.</p>
	<p><u>PEIR Chapter 2: Need</u> I do not accept the claim that there is the need for additional airport capacity in the South East of England</p>	<p>N</p>	<p>The Azimuth Report (document reference TR020002/APP/7.4) provides a detailed case for the reopening of the airport. It is clear that the UK needs additional airport capacity. The evidence shows that air freight is particularly vulnerable to capacity constraints not only in the UK but also in Europe (see the Schiphol Airport example). Manston Airport zoned for aviation use, can provide some of the much-needed capacity almost immediately. RiverOak's planned investment in the airport would provide state-of-the-art facilities for freight, addressing many of the current difficulties experienced by freighter operators.</p>

	<p><u>Air freight demand- Business case</u></p> <p>RSP's economic case relies on ambitious forecasts for growth of air freight despite air freight tonnage having retained relatively steady. According to CAA figures 70% of UK air freight is carried in the belly of passenger aircraft.</p>	N	The case has been made in Volume 1 of the Azimuth Report document reference TR020002/APP/7.4). Government figures show that all South East airports will be full by 2030.
	<p><u>Brexit- Business Case</u></p> <p>Likely impact of Brexit on aviation demand needs to be taken into consideration. Concerns regarding climate change, noise and air pollution should be reassessed in view of Brexit.</p>	N	The impact of Brexit is not possible to fully determine until negotiations with the EU are complete. However, trading further afield than mainland Europe will make the transport of goods by HGV impractical. The use of air freight is therefore likely to increase as the UK trades with emerging economies as well as existing markets. This has been explored in full in the Azimuth Report (document reference TR020002/APP/7.4) .
	<p><u>Consultation</u></p> <p>Information provide as part of the consultation process was confusing, contradictory and inadequate as well as difficult to find and access. Spokespeople of RiverOak have repeatedly denied night flights are part of the business plan. Clear from the documentations that night flights are in fact part of the proposals.</p>	N	RiverOak disagrees that this was the case. The documentation provided at each stage of consultation was the most up to date information available. The consultation process has complied with all relevant legislation and guidance.
Save Manston Airport association	<p>The Association submitted papers to the consultation focused on a breakdown of those who have signed up to their campaign.</p> <p>The association claims 3,459 Facebook members and an email list of 884 people. They recognise</p>	N	RiverOak welcomes this support.

	though that there is potential crossover between the two lists.		
	<p>The association mapped the postcodes of those who responded to a Facebook poll or have signed up for their WordPress Documentation site (as well as supplying details in an accompanying spreadsheet). The stated aim of the submission is to counteract claims that supporters of the reopening of Manston do not live in the area.</p> <p>Their figures show that most of those signed-up to their campaign live in the areas most related to the proposals and under the proposed flight path (the concentration being in the CT postcode).</p>	N	RiverOak welcomes this analysis.
	The association heavily criticises the approach of No Night Flights and, in particular, its attempts to crowd fund a campaign against the airport.	N	RiverOak notes this response.
No Night Flights (NNF)	The campaign submitted a number of detailed papers covering a range of issues strongly opposing the plans to re-open the airport.	N	RiverOak notes NNF's views but disagrees.
	Fundamentally, the group is challenging the Planning Inspectorate to consider whether the application even qualifies to be a DCO. This is based on a range of evidence supplied across the papers submitted.	N	RiverOak's NSIP justification document (document reference TR020002/APP/2.3) sets out RiverOak's case for why the Proposed Development satisfies the test set out in s.23 of the Planning Act 2008.
	Much of the work provides an analysis of the UK air cargo market which details the size of the UK market, the decline in the specific part of the market	N	RiverOak stands by its case. The Azimuth Report (document reference TR020002/APP/7.4) provides a detailed case for the reopening of the airport. It is clear that the UK needs additional

	<p>being targeted by RiverOak, the capacity that already exists at other airports and the number of flights that will be handled. Using the figures provided, NNF challenges the need for a UK national freight hub and the figures used by RiverOak to justify the DCO. NNF also highlights the past commercial failures at Manston to query the nature of the figures used in the business case.</p>		<p>airport capacity. The evidence shows that air freight is particularly vulnerable to capacity constraints not only in the UK but also in Europe (see the Schiphol Airport example). Manston Airport zoned for aviation use, can provide some of the much-needed capacity almost immediately. RiverOak's planned investment in the airport would provide state-of-the-art facilities for freight, addressing many of the current difficulties experienced by freighter operators. RiverOak's plans for Manston airport are based on a different business model than previous operations at the airport.</p>
	<p>Amongst a range of other criticisms, NNF have focused heavily on the poor quality and flawed nature of the RiverOak public consultation. This is raised in a number of the papers including Appendix B to the response to the Azimuth report as well as the consultation response itself. They cite a number of failings including:</p> <ul style="list-style-type: none"> • The failure to inform the local community. • Failings in the documentation provided – its lack of accessibility (with failings on the project website as well as hard copy availability in advance of the consultation sessions) and complexity. • The often conflicting information provided between written materials and that provided at the public consultation sessions. • The lack of public consultation sessions and the behaviour of RiverOak representatives at the sessions. 	<p>N</p>	<p>As set out in this Report, RiverOak believes its three stage consultation was robust and had an appropriate reach. RiverOak refutes all claims that its consultation was inadequate in any way.</p> <p>The consultation was advertised and publicised on a significant scale, with over 50,000 properties having postcards advertising the consultation delivered to them. The number of attendees at the events and the volume and detail of responses to the consultation are further evidence that it was widely known and understood.</p>

	<ul style="list-style-type: none"> • The sheer quantity of technical documents and the short time periods allowed for response. • A lack of environmental information and the related failure to hold a consultation on it. • The reliance on anecdotal evidence on issues such as the shift from road to Manston for cargo coming from Europe. • A failure to adequately consider the insufficient local infrastructure, such as surface access and the capacity of the motorway network. • The absence of consider of alternatives uses for the site. 		
	<p>Furthermore, NNF critique specific aspects of the application such the need, or otherwise, for night flights. The group asks whether the details about night flights have only been included in the application by the specific request of PINS or because RiverOak wishes to operate them. Both have been put forward. The NNF papers highlight:</p> <ul style="list-style-type: none"> • That there will be more night flights than Heathrow and with noisier planes than permitted at Heathrow • Concern with the impacts of the proposed re-opening across health especially the impacts on younger members of the 	Y	<p>RiverOak's business case is based on the potential need for night flights, however in order to mitigate the impacts of the potential proposed night flights, RiverOak is proposing a night time policy which imposes movement limits combined with measures to reduce noise. Further information can be found in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4).</p> <p>A draft of the Noise Mitigation Plan was consulted upon in the 2018 statutory consultation and as a result of feedback received has been modified by cutting the Quota Count by nearly 50%.</p> <p>The Health Impact Assessment, Appendix 15.1 of the ES (document reference TR020002/APP/5.2-13) assesses the potential health impacts associated with changes in noise and air</p>

	<p>community, impact on learning, with a number of schools in the area affected</p> <ul style="list-style-type: none"> • Why no Health Impact Assessment has been provided • The lack of consideration of safety or the need for Public Safety Zones • The absence of a climate change impact assessment, air quality assessment or information on the cumulative effects of the project • The crucial nature of night flights to the dedicated air cargo market 		<p>pollution. Where adverse effects are predicted, measures to mitigate these are set out in that Chapter.</p> <p>RiverOak confirms that both climate change and the cumulative effects of the Proposed Development have been fully assessed and are reported in Chapters 16 and 18 of the ES (document reference TR020002/APP/5.2-2 and 5.2-3).</p>
	<p>The NNF analysis of the night flights issues notes flaws in the use of the Quota Count system, the use of the Basner work, questions why the proposed RiverOak regime should go ahead when it is in contradiction to the Government's approach and falls short of WHO guidelines, and the provision in the application of misleading sound maps.</p>		<p>The assessment methodology set out in Section 12.8 of Chapter 12 of the ES (document reference TR020002/APP/5.2-2) sets out the metrics and evidence base for the assessment of effects of aircraft noise at night. RiverOak's thresholds for significance are set in accordance with the Government's approach set out in noise policy as well as other guidance such as that from the WHO, in particular:</p> <ul style="list-style-type: none"> • The Noise Policy Statement for England (2010) • The Governments Aviation Policy Framework (2013); • Consultation on Draft Airports National Policy Statement: new runway capacity and infrastructure at airports in the South East of England, February 2017; • The WHO 'Guidelines for Community Noise' (1999); • The WHO 'Night Noise Guidelines for Europe' (2009);

		<p>Our assessment considers two metrics for the assessment of night noise:</p> <ul style="list-style-type: none"> • the weighted average noise that residents and others will hear over a night (which appear as 'LAeq'); and • the maximum noise level from each aircraft, which could be a single aircraft in one night (which appear as 'LASmax'). <p>As required by Government Noise Policy, for each assessment period, our assessment methodology defines the following effect thresholds for the different metrics described above (where relevant to the assessment period):</p> <ul style="list-style-type: none"> • LOAEL (Lowest Observed Adverse Effect Level) – the level above which adverse effects on health and quality of life can be detected; • SOAEL (Significant Observed Adverse Effect Level) – the Level above which significant adverse effects on health and quality of life occur; • UOAEL (Unacceptable Observed Adverse Effect Level) Level above which adverse effects are unacceptable; <p>The numerical levels for each effect threshold have been set according to the Government Policy and WHO guidance described above. Our assessments identify all dwellings and communities that fall within these threshold levels. Our noise maps are based on the aircraft forecast and have been designed to identify dwellings and communities falling within the effect thresholds defined above. Based on consultation responses, a revised set of noise maps was developed and presented within the ES.</p>
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	<p>NNF put forward a number of direct challenges to the RiverOak business case for Manston across issues including the suggested employment figures, impact on tourism, biodiversity, the lack of consideration of the project's impact on landscape and it's visual impacts, a failure to assess the alternatives to the proposals, and why little note is made of its impact on the heritage and culture of the area.</p>	<p>N</p>	<p>The Azimuth Report (document reference TR020002/APP/7.4) provides a detailed case for the reopening of the airport. It is clear that the UK needs additional airport capacity. The evidence shows that air freight is particularly vulnerable to capacity constraints not only in the UK but also in Europe (see the Schiphol Airport example). Manston Airport zoned for aviation use, can provide some of the much-needed capacity almost immediately. RiverOak's planned investment in the airport would provide state-of-the-art facilities for freight, addressing many of the current difficulties experienced by freighter operators.</p>
	<p>NNF also argue that the viability of Manston has been questioned by a series of independent reports, not least the Davies Airports Commission.</p>	<p>Y</p>	<p>The Avia Report commissioned by TDC (and other older reports), in terms of air freight, merely extrapolated past performance to give an indication of the likely traffic at Manston Airport. However, the past is not a good predictor of future behaviour and this is particularly the case with an airport that suffered underinvested and has been closed for some time. The Azimuth Report (document reference TR020002/APP/7.4) uses a forecasting method that did not rely of extrapolating past performance. In addition to issues that may have restricted past performance, the future of aviation in the UK and generally is changing. The Airports Commission Final Report (referred to by NNF as 'Davies Airports Commission') was released in July 2015, more than a year after Manston Airport was closed by the current owners. The Commission did not produce a study on the viability of Manston Airport.</p>
	<p>Across several of the submissions NNF details RiverOak's failure to understand the nature of the air cargo market. Again, this is used to question the viability of the project, its status as a DCO application and to pose questions about other</p>		<p>The work undertaken by Azimuth was extensive and the choice of method is explained in detail in the Azimuth Report (document reference TR020002/APP/7.4). An extrapolation of past performance would not be appropriate to predict future traffic at Manston Airport for the reasons given in the report. The aviation</p>

	<p>justifications, and evidence used, for the project in the submissions made by RiverOak. The papers submitted include detailed criticism of the Azimuth report. This is set out across four volumes plus an appendix (B) considering the public consultation on the issues.</p> <p>These highlight a range of flaws with the Azimuth report. They include:</p> <ul style="list-style-type: none"> • A belief that the dismissal of a quantitative approach is “unsound”. There is, for instance, no analysis of previous figures for Manston and the qualitative work uses only small operators, not key players in the cargo market. • The RiverOak work relies on the authorship of one person, it is not peer reviewed. • There is a lack of analysis of associated HGV movements into London. • Questions such as “why was the forecasting method recommended by ACI-NA rejected?” • The partial use of DfT statistics as the basis of the flight figures. • Unjustified assertions made including that there is “potential for current reporting to underestimate the success of the airfreight industry.” 		<p>sector and the drivers behind demand are changing rapidly, particularly the growing use of ecommerce and the need for rapid delivery, the potential effect of the UK’s withdrawal from the EU and the need to trade outside Europe, are among these drivers. The interviewees supplemented industry analysis to highlight these drivers. It should be noted however that a number of the key players in the air freight market were interviewed.</p> <p>The Azimuth Report was peer reviewed by two experts from Loughborough University and by the entire RiverOak team of industry experts.</p> <p>HGV movements in relation to air freight to and from the UK have been analysed in the Azimuth Report and confirm earlier reports that trucking is used extensively to move goods to and from the UK to European airports.</p> <p>DfT statistics have been incorporated into the Azimuth Report. These show that all London airports will soon be at capacity. The lack of detail around freight-only flights is the subject of ongoing discussions with the DfT and RiverOak/Azimuth await their response.</p> <p>All work has been fully justified. Both ATMs and tonnage are shown as both are key to masterplanning and to assessing environmental impact.</p> <p>The percentage applied to year 10 figures to project growth from year 11 to 20 has been fully explained in the Azimuth Report. In 2017, the air freight industry showed huge growth, further justifying the percentage uplift applied to year 10 figures</p> <p>Most industry figures for freight are shown as RTKs (revenue tonne kilometres). These are a good indicator of growth in the sector and are used in conjunction with all available data.</p>
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	<ul style="list-style-type: none"> • An NSIP requires an ATM figure, not tonnage; the Azimuth report incorrectly applies tonnage growth to ATMs. • The incorrect application of the DfT's five year growth figure to each individual year. • The misapplication of reports by Airbus, Boeing and IATA to support forecasts as they are about 'how much and how far' not 'how many flights'. • An error in taking the forecasts for growth in Freight Tonne Kilometres and projecting them onto growth in freight ATMs. • The reliance on an unpublished PhD thesis. • The failure to use the available historical data for Manston. • The report's failure to clarify what makes Manston's airspace "ideal". • The failure to evidence a number of assertions including that Manston is strategically located, that massive additional capacity (for passenger and freight) at Heathrow airport will not impact on plans for a re-opened airport at Manston, that there is "unmet demand", and that the "current dominance of belly freight in the UK" might change. 	<p>None of the individual documents used in the Azimuth Report were relied upon – anyone could be removed and the report and its conclusions would stand.</p> <p>Historical data for Manston is clearly presented. However, the past performance of the airport, which was without substantial modernisation since privatisation, cannot be relied upon as an indicator of the future potential of Manston Airport under the plans presented by RiverOak.</p> <p>Clarification of "ideal airspace" has been provided in the Azimuth Report. We are grateful for the comments by NNF, which have highlighted that this was previously not clear to the lay reader.</p> <p>All assertions have been clarified. The debate about the third runway at Heathrow is, as yet and at the time of the DCO application, ongoing. As such, it is unlikely that additional capacity will be operational for quite some years. During this time, the UK would, without maximising existing airport capacity including at Manston Airport, lose out economically. A study of the extent of these losses was undertaken by London First and are detailed in the Azimuth Report. Once (or should) Heathrow's third runway be open, it is possible that capacity will be taken by low cost carriers who traditionally do not carry freight. As such the demand for air freight would still need to be met at an airport such as Manston that can provide specialist facilities.</p> <p>Lydd Airport, along with other airports in the South East, was considered and details are provided in the Azimuth Report. Lydd Airport is not suitable for air freight operations for a number of reasons including the length of the runway, access, suitable warehousing.</p>
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	<ul style="list-style-type: none"> • The Azimuth report fails to consider Lydd Airport and does not acknowledge the negative social and economic impacts of RiverOak's proposals. • Counter to the findings of the Azimuth report, the nature of Manston's location makes it inappropriate for a cargo operation. • Azimuth's reliance on work, such as that of York Aviation, that focuses on the London market, not the national market. • The poor quality of evidence for justifying employment figures. • It is light on any examination of the effect of the project on the tourism sector. 		<p>Manston Airport is located in the South East where demand is highest, is well connected to the road network, and is outside the congested London airspace.</p> <p>The comments by NNF have been gratefully received and amendments and additions to the employment figures have been made. We are pleased to have been able to respond to these comments and have increased the detail in the employment section of the Azimuth Report. Employment and the regeneration of Thanet are important issues. Deprivation in Thanet and lack of employment opportunities have been problems for very many years. The reopening of the airport would provide significant employment across a range of skills. RiverOak would continue to work with HE/FE to ensure training and education opportunities to match demand are in place for local people.</p> <p>The Azimuth Report has considered the impact on tourism based on examples from other UK coastal towns with airports. These include Southend, Southampton and Bournemouth. No examples of a negative impact on tourism could be found and demand for tourist-related services including accommodation, food, entertainment, etc. would be expected.</p>
	<p>The papers submitted include a critique of a report commissioned by RiverOak looking at an earlier report by Avia Solutions for Thanet District Council. The response from NNF challenges the RiverOak figures across freight and also criticises the passenger figures used and the supposed behaviour of passenger operators.</p>		<p>Passenger forecasts in the Avia Report correspond to the figures in the Azimuth Report. RiverOak has been in dialogue with airline operators and are confident that the figures in the Azimuth Report are achievable. Furthermore, in light of the current (2017) performance of the air freight market and the continued capacity constraints in the South East, the forecast is considered achievable.</p>

	<p>In its formal response to the consultation, NNF include details of a survey they ran complete with results which shows opposition to the plans. The group is also critical of the relationship they allege between the Save Manston Airport association and RiverOak as well as the 'myths' put forward by supporters the proposals. Concern is expressed with the process around the application to the CAA for a licence.</p>	N	<p>RiverOak notes this comment, however believes that it has carried out its own objective and thorough consultation process, the feedback from which is presented in this Report.</p>
	<p>As well showing, as they would contend, the evidential failings in RiverOak's plans, NNF focus also on the noise, health and environmental impacts of the project. Whilst this is often in the context of night flights, there are wider concerns expressed about the impact on local communities especially those under the proposed flight paths (although the lack of available information on these is a further criticism of NNF).</p>	N	<p>RiverOak has carried out an environmental impact assessment, which is fully reported on in the ES (document reference TR020002/APP/5.2). Noise, health, impacts on communities, and all other environmental impacts are reported on in the ES.</p>
	<p>Throughout the documents, NNF make a plea for the Planning Inspectorate to consider their arguments and the evidence presented. This is especially the case in relation to whether the project is really a DCO and again on its failings such as in relation to the public consultation.</p>	N	<p>RiverOak notes this comment.</p>
Kent Wildlife Trust (KWT)	<p>KWT objects to the Proposed Development, primarily on the basis that insufficient amount of information has been provided at the consultation stage to enable KWT to make any more detailed comments on the likely impact of the proposals</p>	N	<p>Ecological surveys are seasonal depending upon the type or group of organisms being surveyed, and therefore have to be completed during a certain period of the year. The site survey programme has been dependent upon obtaining site access from the landowners. This has been incomplete and resulted in no access being granted</p>

	<p>either on the site itself or on the wider surrounding areas.</p>		<p>between March and late August 2017. As such it was not possible to undertake those surveys that were required over that period. Further information on how the lack of a complete environmental survey has been addressed can be found in Chapter 5 of the ES (document reference TR020002/APP/5.2-1).</p>
	<p>Concerns that proposals for flightpaths and airspace will not be finalised prior to submission of the DCO and the predicted level of disturbance and pollution at sensitive nearby sites, such as Sandwich and Pegwell Bay therefore cannot be properly assessed.</p>	<p>N</p>	<p>Flight paths have been assessed as ‘swathes’ in the Environmental Statement and will be refined within those swathes via an airspace change proposal to the Civil Aviation Authority, expected to commence shortly after the DCO application has been accepted. Noise from aircraft has been assessed in the ES and controlled via the Noise Mitigation Plan (document reference TR020002/APP/2.4), a series of commitments that must be adhered to.</p>
	<p>The ES should demonstrate that proposal does not have a negative impact upon nearby internationally protected sites.</p>		<p>Potential impacts on internationally protected sites are addressed within the Report to inform the Appropriate Assessment which can be found at Appendix 7.1 of the ES (document reference TR020002/APP/5.2-6).</p>
	<p>Need to include measures to safely disperse birds and other wildlife from the runways without harm alongside a long-term conservation management plan.</p>		<p>Bird disturbance is considered and evaluated at in ES Chapter 7 (document reference TR020002/APP/5.2-1) and Appendix 7.2 (document reference TR020002/APP/5.2-6). Additional biodiversity management measures are detailed in the CEMP (document reference TR020002/APP/5.2-6) and these will be further evaluated prior to the commencement of construction work.</p>
	<p>A full consideration in the ES of both the “do nothing” scenario but also any alternative development location that can deliver the same development proposal at other, less environmentally sensitive locations.</p>		<p>Alternative scenarios including a ‘do nothing’ scenario are considered in Chapter 2 of the ES (document reference TR020002/APP/5.2-1).</p>

	Detailed proposals should demonstrate good quality enhancement opportunities for biodiversity.		Significant provision has been made for off-site biodiversity mitigation and enhancement should it be necessary to carry out such measures. Detailed proposals will be worked up following additional site surveys and prior to the commencement of construction activities.
CPRE Kent	In summary, CPRE Kent have commented that proposals claim benefits far greater than those that would actually be achieved, and seriously underplay the many adverse effects that would be caused.	N	RiverOak does not agree that this is the case. The ES sets out both the potential likely impacts of the developments as well as the benefits. Full details can be found in the ES (document reference TR020002/APP/5.2).
	Concerned about viability of the Proposed Development.	N	The Azimuth Report (document reference TR020002/APP/7.4) provides a detailed case for the reopening of the airport. It is clear that the UK needs additional airport capacity. The evidence shows that air freight is particularly vulnerable to capacity constraints not only in the UK but also in Europe (see the Schiphol Airport example). Manston Airport zoned for aviation use, can provide some of the much-needed capacity almost immediately. RiverOak's planned investment in the airport would provide state-of-the-art facilities for freight, addressing many of the current difficulties experienced by freighter operators.
	Concerned about unrealistic job creation predictions.	N	The Azimuth Report (document reference TR020002/APP/7.4) shows the forecasts for employment that Manston Airport is likely to generate. These jobs are predicted to be direct (including those created by the airport operator, airlines, general aviation, handling, immigration and customs, retail and food concessions and aircraft maintenance), indirect (including a wide range of jobs in the airport's supply chain), induced (which includes jobs created by the spending of people employed directly and indirectly), and catalytic (which includes jobs in the wider economy supported by the

			operations of an airport such as in tourism and trade). Job creation to Year 20 of operation is forecast to total more than 23,000 across all categories.
	Concern about the number of flights in the light of the UK's commitment to legally binding targets for reducing greenhouse gas emissions.	N	The impact on climate change is assessed in Chapter 16 of the ES (document reference TR020002/APP/5.2-2) .
	<p>No adequate control of the noise nuisance suffered by residents, especially at night in the Noise Management Plan:</p> <ul style="list-style-type: none"> • The noise levels proposed are too high. • There is lack of information on noise contours in the Noise Mitigation Plan and lack of noise level controls. • Noise Mitigation Plan should instead be a Noise Action Plan and must show that the proposed noise-control measures provide adequate protection for the public in accordance with EU, government and local guidelines and regulations. • The 'shoulder period' must be outside the night period. • Include commitment to have no night flights. • The DCO application needs to show noise contours at least down to the levels in the current the WHO Night Noise Guidance, and calculate the health impact caused by 	Y	<p>RiverOak understands that noise is a worry for some respondents and is therefore proposing a night time policy which imposes movement limits combined with measures to reduce noise. Further information can be found in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4).</p> <p>This Noise Mitigation Plan was consulted upon during the 2018 statutory consultation and has been amended, including an almost 50% reduction in the Quota Count, as a result of feedback received to incorporate further mitigation measures to reduce the effects of noise.</p> <p>The ES shows the daytime 50dB(A) contour at Figure 12.4 and 12.6 and the 40dB(A) night time contour at Figures 12.5 and 12.7 (document reference TR020002/APP/5.2-4). These reflect the current WHO guideline limits as well as the LOAEL levels that are accepted practice for aircraft noise. The health impacts of daytime and night time noise are assessed in ES Chapter 15 (document reference TR020002/APP/5.2-2).</p>

	the noise levels above the Guidance levels.		
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Summary of Influence on the Proposed Development

10.29 The main changes to the project at this stage were to provide more explanations in the Environmental Statement and to amend the Noise Mitigation Plan to increase the mitigation of aircraft noise.

11 STAGE 3: STATUTORY CONSULTATION: COMMUNITY CONSULTATION (SECTION 47)

- 11.1 Before commencing Stage 3 statutory community consultation, RiverOak prepared a draft SoCC setting out how it intended to consult people living in the vicinity of the land affected by the Proposed Development.
- 11.2 As with the Stage 2 Consultation, the primary goal of the SoCC was to set out a consultation that fully complied with the statutory requirements and government guidance on pre-application consultation for Nationally Significant Infrastructure Projects, while also carrying out an effective consultation to ensure that people living and working in the vicinity of the area have the opportunity to engage in the process. RiverOak reviewed feedback from Stages 1 and 2 about the consultation process in developing its SoCC.
- 11.3 In producing the SoCC, RiverOak researched the local area and considered the most appropriate means of consulting each category of consultee, given the nature and scale of the Proposed Development. Building on the previous two stages of consultation, RiverOak developed a consultation strategy that included the following aims and objectives:
 - 11.3.1 Ensure the consultation was undertaken in compliance with the PA 2008, specifically sections 37, 42-49 as they relate to pre-application consultation, using best practice consultation methods and drawing on expertise from other major infrastructure projects
 - 11.3.2 Include a wide range of stakeholders (as set out above) by making the consultation accessible, with information available in hard copy and online, in both technical and non-technical formats
 - 11.3.3 Clearly communicate the benefits and impacts of RiverOak's proposals and set out what can and cannot be influenced as part of the consultation
 - 11.3.4 Offer appropriate and convenient methods, both traditional and digital, of providing feedback to help make it easy for consultees to respond to the consultation
 - 11.3.5 Take reasonable steps to identify, engage and consult with hard to reach groups potentially affected or interested in the Proposed Development
 - 11.3.6 Utilise existing local networks and stakeholder relations to raise awareness and promote the consultation
 - 11.3.7 Ensuring all feedback received is considered, and

11.3.8 Utilise local expertise, knowledge and experience that may challenge the technical and environmental aspects of the proposals.

11.4 A copy of the draft SoCC for Stage 3 Consultation can be found at **Appendix 44**.

11.5 In accordance with Section 47(2), RiverOak then consulted the relevant host Local Authorities and Parish and Town Councils about the contents of the draft SoCC. The same Local Authorities and councils which were consulted on the Stage 2 SoCC were consulted on the Stage 3 SoCC (see section 7 above)

11.6 The draft SoCC was emailed to the same Local Authorities and parish and town councils on 24 November 2017 together with a short covering email seeking their comments on what would be the best way to consult with the community. A copy of the email sent can be found at **Appendix 45**. Responses were asked for by close of business on Friday 22 December 2017, providing the 28 days for response as set out in the Act.

11.7 During this period, only three of the authorities responded: KCC, DDC and TDC. No further late responses were received after the 28 days period. Copies of these responses are provided at **Appendix 46**.

A summary of all of the responses received to the requested email address and an explanation of how RiverOak took account of these responses is provided in **Table 11.1** below. **Table 11.1: Local Authority responses in respect of draft SoCC and how RiverOak had regard to the responses**

Local Authority Response	Change? Y / N	How RiverOak had regard to the response
Kent County Council (KCC)		
Comments on Stage 2 SoCC should be read in conjunction with this response.	N	Please refer to Table 8.1 for further details of KCC's Stage 2 SoCC response.
Consultation Leaflet should be sent to all residential and business addresses within a consultation zone boundary.	Y	RiverOak has agreed to send postcards advertising the consultation to all properties within 3km of the airport boundary and also all properties in the towns of Ramsgate and Herne Bay.
Appendix 1 should contain list of community groups.	Y	Appendix 1 of the SoCC contains a list of Manston Airport Interest Groups which RiverOak are contacting directly with details of the consultation.

Not clear whether the 'Overview Report' is the same as the 'Consultation Document'. There should be consistency in the document titles used.	N	The Overview Report has been renamed the 'Introduction to Consultation' for clarity.
If documents are to be made available in libraries, the applicant is advised to promptly contact KCC Libraries Information Services to discuss the proposed arrangements during the consultation period, if this has not been done to date.	Y	RiverOak liaised with Sue Fordham, Service Manager, Dover & Thanet districts Libraries, Registration & Archives to arrange for consultation documents to be made available in the locations listed in the SoCC. Sue also contacted Herne Bay library.
Potential charge of £500.00 for a copy of the PEIR is excessive and should be reviewed and set at an appropriate level, in order not to deter those from accessing information which sets out the likely environmental effects of the proposal and the mitigation proposed.	N	RiverOak maintained the £500 charge as this is a figure regularly used in SoCCs and is to deter unnecessary printing of huge volumes of paper.
Not clear whether the 'Consultation Leaflet' is the same as the 'Consultation Document' or the 'Overview Report'.	N	The Overview Report has been renamed the 'Introduction to Consultation' for clarity.
Suggested that the third bullet point of paragraph 10.2 be amended to read: <i>"representatives of the identified community groups and organisations will be contacted directly in advance or at the start of the consultation period with details about the consultation."</i>	Y	RiverOak confirm that these groups were contacted at the start of the consultation.
The third bullet point at paragraph 10.2 (pg. 9) should be amended to state, "... venues are	Y	This change has been made and can be found at the end of paragraph 9.2.

<i>accessible and can be reached by public as well as private transport.”</i>		
Has the Kent International Airport Consultative Committee been reinstated?	N/A	This is not a matter for the SoCC but further information on this can now be found in the Noise Mitigation Plan (document reference TR020002/APP/2.4).
Dover District Council (DDC)		
Sandwich Library times need to be amended to: Mon, Tue, Thu & Fri : 9am – 5pm, Wed, Sat: 9am – 1pm, Sun: Closed	Y	RiverOak confirms that the library times were checked with the libraries directly and were amended in the SoCC to reflect the updated opening hours of all libraries, including Sandwich.
Recommend a further consultation event be held in the Dover District.	N	Two events have already been held in Dover District; this consultation was targeted at towns under the flightpath.
Recommend Preston, Wingham and Ash Parish Councils and any relevant environmental groups, civic societies and cultural, historical, archaeological bodies are consulted.	Y	Preston, Wingham and Ash Parish Councils have been added to the list of organisations in Appendix 1 .
Thanet District Council (TDC)		
Regard should be had to comments on Stage 2 SoCC and Stage 2 Consultation response in particular comments regarding the lack of information in the PEIR.	N	Please refer to Table 8.1 for further details of KCC’s Stage 2 SoCC response.
Consultation period should be extended to 6 weeks.	N	The minimum statutory timeframe under the PA 2008 for a consultation is 28 days. RiverOak’s 2018 statutory consultation was 35 days which RiverOak considers appropriate.
All residences and businesses within 3km of the airport should be consulted by post.	Y	RiverOak agreed to send postcards advertising the consultation to all properties within 3km of the airport boundary and also all properties in the towns of Ramsgate and Herne Bay.

All residences and businesses within 1km of the proposed or potential flight paths should be consulted by leaflet drop.	Y	50,000 households in a wide area including the flightpath swathes near the airport and all of Herne Bay and Ramsgate had postcards delivered
Newspaper adverts should be taken in both free and paid for local papers in Thanet as well as local papers in Herne Bay and Sandwich. The Canterbury Times newspaper ceased to be published in September 2017.	Y	RiverOak advertised the consultation in the East Kent Mercury, Dover Mercury, Canterbury Gazette, Herne Bay Gazette, Whitstable Gazette, Faversham News, and Thanet Gazette during the two weeks before the first week of the consultation.
An additional consultation event should be scheduled in either Birchington or Minster.	N	It was decided only to have further events at Herne Bay and Ramsgate, those most affected by aircraft noise and the most popular events at Stage 2
The proposed event at the Comfort Inn, Ramsgate should be extended until at least 8pm	Y	RiverOak extended the event until 8pm as requested.
Unclear why Business Organisations are not included in Appendix 1 . Expect that as a minimum all previously consulted organisations will be reconsulted.	N	Previously consulted organisations who supplied an email address were reconsulted (including residences, this amounted to 2000 email addresses)
The following additional consultees should be consulted: Coastal Community Teams in Ramsgate, Broadstairs and Margate; Federation of Small Businesses; Kent Invicta Chamber; Thanet and East Kent Chamber; Thanet Business Forum; Breakfast Networking International; Thanet Premier Business Group; and Thanet Business Network.	Y	RiverOak confirm that these groups were consulted.

- 11.8 A copy of the final Stage 3 SoCC can be found at **Appendix 40**.
- 11.9 The SoCC briefly explained what the Proposed Development would involve, why RiverOak was promoting the Proposed Development, the procedure under which the Proposed Development would be consented, how RiverOak would obtain the community's views during the statutory consultation period, and how and when interested persons could make their views known.
- 11.10 In accordance with Section 47(6), the SoCC was then made available for inspection and a notice (combined with a s48 notice) was published in local and national newspapers to explain where the SoCC could be inspected. A copy of the SoCC notice can be found at **Appendix 33**.
- 11.11 The SoCC (combined with s.48 notice) notice was published as explained in **Table 11.2** below.

Table 11.2 SoCC notice: newspapers and dates of publication

Newspaper	Date
East Kent Mercury Series: Deal, Sandwich, Dover Mercury	3 and 10 January 2018 (NB. The Deal Edition has an error on its front page stating 4 January but the correct dated of 3 January is on the page of the Notice.)
Kentish Gazette Series: Canterbury & District, Herne Bay Gazette, Whitstable Gazette, Faversham News	4 and 11 January 2018
Isle of Thanet Gazette	5 and 12 January 2018
The Times	4 January 2018
London Gazette	4 January 2018 (online); 5 January 2018 (hard copy)

- 11.12 Copies of the published versions of the notice can be found at **Appendix 47**.
- 11.13 The SoCC was made available for public inspection on RiverOak's website (www.rsp.co.uk) and printed copies were placed in the public libraries set out in **Table 11.3** below for the duration of the consultation. Printed copies were also made available at consultation events.

Table 11.3: Locations at which SoCC was available for public inspection

Venue	Opening hours
Birchington Library	Mon, Tue, Thu, Fri: 9am-6pm Sat: 10am-2pm, Wed, Sun: closed
Broadstairs Library	Mon, Tue, Wed, Fri: 9am-6pm Thu: 9am-8pm, Sat: 9am-5pm, Sun: closed
Cliftonville Library	Mon, Tue, Thu, Fri: 9am-5pm Wed, Sat: 9am-1pm, Sun: closed
Deal Library	Mon-Fri: 9am-6pm, Sat: 9am-5pm Sun: 10am-4pm
Herne Bay Library	Mon-Fri: 9am-6pm, Sat: 9am-5pm Sun: closed

Margate Library	Mon, Tue, Wed, Fri: 9am-6pm Thu: 9am-8pm, Sat: 9am-5pm, Sun: closed
Minster-in-Thanel Library	Mon, Tue, Thu: 9am-1pm & 2pm-5pm, Fri: 9am-5pm, Sat: 9am-1pm, Wed, Sun: closed
Newington Library	Mon, Tue, Thu, Fri: 9am-6pm Sat: 10am-2pm, Wed, Sun: closed
Ramsgate Library	Mon-Fri: 9am-6pm, Sat: 9am-5pm, Sun: closed
Sandwich Library	Mon, Tue, Thu, Fri: 9am-5pm, Wed: 9am-1pm; Sat: 10am-1pm Sun: closed
Westgate Library	Mon, Wed: 9am-5pm, Tue, Fri: 9am-6pm, Sat: 10am-2pm, Thu, Sun: closed

11.14 As described above, because the Proposed Development constitutes EIA Development for the purposes of the EIA, there is a requirement under Regulation 12 of the EIA Regulations 2017 that the SoCC must set out that the Proposed Development is EIA Development and how RiverOak intends to publicise and consult on preliminary environmental information. This information is provided at section 4.5 of the SoCC. Further information on EIA consultation can be found in Chapter 14 of this Report.

Timing of Community Consultation

11.15 The consultation commenced on 12 January 2018 and as such took place in parallel with consultation under Section 42 and publicity under Section 48.

11.16 Community consultation closed on 16 February 2018.

Scope of Community Consultation

11.17 Consultation was carried out fully in line with the published SoCC. **Appendix 49** sets out the consultation as prescribed in the published SoCC and how the Applicant carried out consultation in line with it. Details of the activities undertaken as part of the consultation can be found in the below.

11.18 In line with feedback on the draft SoCC, a consultation zone was created consisting of all properties in Ramsgate and Herne Bay, all properties within 3km of the airport boundary, and any other properties under the proposed flightpath swathes of the aircraft that would use the Proposed Development, totalling some 50,000 properties. A postcard was hand delivered to all these properties by a local delivery company engaged by Copper Consultancy, RiverOak's consultation consultants. The delivery company verified that they had delivered to the properties shown at **Appendix 51** (which also contains a copy of the postcard), and as an additional safeguard, whenever Copper Consultancy or RiverOak received notice that anyone had not received a postcard, a redelivery was ordered to the entire street of the address of the person in question. Redeliveries continued on request until the consultation events had taken place.

11.19 A map showing the Stage 3 Consultation zone can be found in **Appendix 48**.

11.20 The Stage 3 community consultation was carried out in accordance with the SoCC as published. A table setting out how RiverOak has complied with the SoCC is included at **Appendix 49**.

Hard to Reach groups

11.21 To ensure that 'hard to reach' groups were encouraged to get involved in the consultation, the consultation materials were prepared to be accessible and clear. RiverOak also ensured that:

11.21.1 The contact telephone number and email address were prominent on all published material (including this SoCC) and enable individuals to contact the team directly with questions or requests;

11.21.2 The Introduction to consultation and Feedback Form could be made available in alternative forms on request (e.g. large print, braille, languages other than English); and

11.21.3 representatives of the identified community groups and organisations were contacted directly with details about the consultation; and

11.21.4 RiverOak sought to ensure that venues are accessible and can be reached by public as well as private transport.

Community Consultation Materials

11.22 The following consultation materials were made available throughout the Community Consultation:

11.22.1 an introduction to the consultation giving an overview of the proposals and where additional or updated information can be found (see **Appendix 35**);

11.22.2 an updated Preliminary Environmental Information Report (**2018 PEIR**);

11.22.3 a non-technical summary of the 2018 PEIR (**Appendix 39**)

11.22.4 an updated masterplan (**Appendix 36**);

11.22.5 a Noise Mitigation Plan (**Appendix 41**);

11.22.6 the SoCC (**Appendix 40**);

11.22.7 an updated analysis on air freight capacity and need: *Manston Airport - a Regional and National Asset, Volumes I-IV*; an analysis of air freight capacity limitations and constraints in the South East and Manston's ability to address these and provide for future growth (**Appendix 37**); and

11.22.8 a Feedback Form, in order to collect responses to the consultation (**Appendix 34**);

11.23 These materials were made available in five ways:

11.23.1 Electronic copies were available on the RiverOak website (www.rsp.co.uk) for the duration of the Community Consultation;

- 11.23.2 Printed copies were available at consultation events to review and copies of the Introduction to Consultation and Feedback Form were available to take away;
- 11.23.3 Printed copies were placed in the libraries listed in **Table 11.4** below for the duration of the consultation;
- 11.23.4 Hard copies of the consultation documents (excluding the 2018 PEIR) were available free of charge on request (hard copies of the 2018 PEIR were also available on request but, due to the size of the document, this incurred a £500 charge);
- 11.23.5 Electronic copies of all consultation documents (including the 2018 PEIR) on a USB stick were available free of charge on request.
- 11.24 Due to the size of the 2018 PEIR, it was only available to review in hard copy form at Deal, Margate and Ramsgate libraries. Following feedback received from local residents, an additional copy of the PEIR was placed in Herne Bay library part way through Stage 3 Statutory Consultation. The other libraries contained copies of all the other consultation documents including the non-technical summary of the 2018 PEIR.
- 11.25 To ensure the full suite of consultation documentation remained available at the libraries for the whole of the consultation period, the documents at the libraries were checked on a weekly basis by a member of RiverOak’s consultation team.

Table 11.3: Locations at which Community Consultation documents were available for public inspection

Venue	Opening hours
Birchington Library	Mon, Tue, Thu, Fri: 9am-6pm Sat: 10am-2pm, Wed, Sun: closed
Broadstairs Library	Mon, Tue, Wed, Fri: 9am-6pm Thu: 9am-8pm, Sat: 9am-5pm, Sun: closed
Cliftonville Library	Mon, Tue, Thu, Fri: 9am-5pm Wed, Sat: 9am-1pm, Sun: closed
Deal Library	Mon-Fri: 9am-6pm, Sat: 9am-5pm Sun: 10am-4pm
Herne Bay Library	Mon-Fri: 9am-6pm, Sat: 9am-5pm Sun: closed
Margate Library	Mon, Tue, Wed, Fri: 9am-6pm Thu: 9am-8pm, Sat: 9am-5pm, Sun: closed
Minster-in-Thanel Library	Mon, Tue, Thu: 9am-1pm & 2pm-5pm, Fri: 9am-5pm, Sat: 9am-1pm, Wed, Sun: closed
Newington Library	Mon, Tue, Thu, Fri: 9am-6pm Sat: 10am-2pm, Wed, Sun: closed
Ramsgate Library	Mon-Fri: 9am-6pm, Sat: 9am-5pm, Sun: closed
Sandwich Library	Mon, Tue, Thu, Fri: 9am-5pm, Wed: 9am-1pm; Sat: 10am-1pm Sun: closed

Westgate Library	Mon, Wed: 9am-5pm, Tue, Fri: 9am-6pm, Sat: 10am-2pm, Thu, Sun: closed
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Community Consultation activities

11.26 RiverOak carried out a number of consultation activities throughout the Community Consultation.

Events

11.27 RiverOak held two events which were open to anyone to attend and which were advertised in the consultation materials. Based on the response to previous stages of consultation, RiverOak specifically chose Ramsgate and Herne Bay as the location for the events as many of the concerns raised about the Proposed Development were raised by local residents in these areas.

11.28 Event attendees were asked to provide their postcode, if they were happy to do so. These postcodes were then mapped to provide a visual representation of where event attendees were from. The maps are provided at **Appendix 50** to this Report. The maps show that event attendees came from across all areas of Thanet.

11.29 Visual displays of the proposals were available at the events (**Appendix 62**) and members of RiverOak's team attended each event, including legal, environmental, aviation and public experts, and were available to answer questions from members of the public. **Table 11.4** below sets out the locations, timings and attendee numbers of these events.

Table 11.4: Locations, timings, and attendee numbers of Community Consultation Events

Location	Venue	Date and time	No. attendees
Ramsgate	Comfort Inn Victoria Parade, Ramsgate, CT11 8DT	Tuesday 23 January 2018 12noon - 8pm	535
Herne Bay	The King's Hall Beacon Hill, Herne Bay, CT6 6BA	Wednesday 24 January 2018 12 noon - 8pm	334

Letters & Emails

11.30 Postcards advertising the consultation were sent to all properties within 3km of the airport boundary and also all properties in the towns of Ramsgate and Herne Bay and elsewhere under the proposed flightpath swathes near the airport, amounting to 50,000 properties. A copy of the postcard is included at **Appendix 51**.

11.31 Plans showing the extent of the 2018 consultation are included at **Appendix 48**. The coloured areas show the streets and properties within the consultation area (the different colouring indicates how the wider consultation area was divided for the purposes of delivering consultation materials).

- 11.32 Emails were sent to those who have previously expressed an interest in the Proposed Development or responded to either of the previous consultations and provided RiverOak with an email address, amounting to over 2600 email addresses at this stage. Further details of these emails can be found in **Appendix 60**.
- 11.33 Letters and/or emails were sent to elected representatives in the area including MPs, MEPs, Thanet District and KCC councillors (a list of these can be found at **Appendix 43**, and an example letter can be found at **Appendix 61**);
- 11.34 Letters and/or emails were also sent to local community groups and organisations who we are aware are active in the area and for whom we have contact details. A list of these community groups can be found in **Appendix 1** of the Stage 3 SoCC.

Online

- 11.35 Information about the Consultation was available on the RiverOak website at www.rsp.co.uk and updates were sent using Twitter (@RSPManston) and Facebook (www.facebook.com/RSPManston).

Press

- 11.36 RiverOak placed advertising in the East Kent Mercury, Dover Mercury, Canterbury Gazette, Herne Bay Gazette, Whitstable Gazette, Faversham News, and Thanet Gazette during the two weeks before and during the first week of the consultation.
- 11.37 Press releases were also issued to the local press at the start of the consultation and later in the process to encourage participation. Further details of the press releases and press coverage, as well as copies of the newspaper adverts as they appeared in local papers can be found in the Media Report at **Appendix 52**.

Additional Activities

- 11.38 RiverOak ensured that reports were received from the distributors of the consultation postcards to confirm that delivery had taken place to all relevant areas. However, during the consultation period RiverOak received feedback from several consultees who reported that they had not received a postcard despite being within a relevant area. RiverOak therefore instructed the distributor to redeliver to the whole of the streets where it had been made aware of residents not receiving a postcard to ensure all relevant consultees received the postcards.

Consultation Feedback

- 11.39 Community consultees were encouraged to provide feedback in any of the following ways:
- 11.39.1 hard copy feedback form which could be posted or returned at a Consultation Event (see **Appendix 34**);
 - 11.39.2 online feedback form via the Proposed Development consultation website, (see **Appendix 53**);
 - 11.39.3 Email to manstonconsultation@bdb-law.co.uk; and

11.39.4 Letter to Manston Airport Consultation, Bircham Dyson Bell, 50 Broadway, London, SW1H 0BL.

Volume of responses

11.40 The table below outlines the volume of responses received within the consultation timeframe above:

Table 11.5: Volume of responses to Community Consultation

Letters / Email	Online	Feedback form	Total
600	549	169	1318

11.41 Approximately 39 calls were made to the Proposed Development Freephone number prior to and during the consultation, with 35 calls taking place during the consultation. Calls received from stakeholders covered a range of topics, including:

- 11.41.1 Asking specific questions about the proposal
- 11.41.2 Registering for business events, public events and meetings
- 11.41.3 Expressing support and objection to the Proposed Development
- 11.41.4 Asking questions regarding leaflet distribution
- 11.41.5 Requesting updates on the DCO process

11.42 Additional community consultation responses were received after the consultation ended on 16 February – 63 in total. All those who had been given an extension for legitimate reasons, and all late responses received within four days of the deadline were dealt with in the same way as community responses received before the deadline. RiverOak has had regard to them in the same way as responses received during the consultation and they have been included in the tables summarising the responses below. 22 responses were received after that and have not been taken into account as there was not enough time to do so given the application submission date.

Relevant Responses

- 11.43 Five questions were asked on the feedback form.
- 11.44 A summary of key issues raised in response to each question (and the number of times each issue was raised) is provided in **Tables 11.8-11.12** below together with an explanation of how RiverOak has had regard to them. As there were around 1200 such comments it is better to summarise them by topic rather than list them individually.
- 11.45 Some responses have been moved to a different table where the comments relate to that particular question. We have maintained an audit trail to show where each response has been taken account of in the table.

- 11.46 Further responses to community consultation were also received by email, rather than through responses to the specific questions raised. A summary of the key issues raised in these responses (and the number of times each issue was raised) is provided in **Table 11.13** below together with an explanation of how RiverOak has had regard to them.
- 11.47 As community consultation under Section 47 was ongoing when the Section 48 notices were published, responses to both were received within the same deadline. Accordingly, details of relevant responses received from members of the public in response to the publication of the Section 48 notice are also included in the tables below.

Table 11.8: Summary of issues raised in Stage 3 community consultation in response to Question 1 of the Feedback Form and how RiverOak had regard to the responses

Question 1: Do you have any comments on RiverOak’s updated Masterplan for Manston Airport?

Topic	Issue raised	Change? Y / N	Regard had to response
Tourism	The Proposed Development will impact tourism in Ramsgate and elsewhere	Y	<p>The effects on tourism are discussed within Chapter 13: Socio-Economics of the ES (document reference TR020002/APP/5.2-2). Tourism receptors in the vicinity of the Proposed Development may experience effects resulting from the increased activity in the geographical area, in both construction and operational phases. For tourism businesses within the surrounding area, the increased visitor numbers associated with the airport operation, in conjunction with increased incomes from employees at Manston, will likely lead to increased demand for tourism facilities and associated spending in the locality. This could result in improvements to their volume of trade.</p> <p>In terms of indirect impacts, such as increased traffic, noise or dust, detailed assessments have been undertaken in Chapter 6: Air Quality, Chapter 12: Noise and Chapter 14: Traffic and Transport of the ES (document reference TR020002/APP/5.2-1 – 5.2-2). The negative effects on tourism are commonly observed to be related to noise and traffic.</p> <p>The effects of noise on tourist businesses will be minimal as the increase in urban areas will be small compared to existing sources.</p>

			<p>Aircraft noise will increase at the main beach in the centre of Ramsgate which is already subject to urban noise but there will be no noticeable noise increases at any other Kent beaches.</p> <p>Outside these areas the effects will depend on existing background levels but in general are considered sufficiently low not to affect the level of business activity or value. The site is well connected by road and rail and traffic increases are assessed to be minimal. The effects of traffic on tourism are considered to be low and will not affect the level of business activity or value.</p> <p>In the 2018 statutory consultation, RiverOak consulted on a draft Noise Mitigation Plan. Having taken on board feedback from the consultation it has increased the proposed noise mitigation measures that were originally proposed in order to limit adverse impacts on tourism, amongst other things. The updated Noise Mitigation Plan (document reference TR020002/APP/2.4) provides further details.</p>
<p>Additions to the site and heritage</p>	<p>Various suggestions for facilities at the airport: flying schools, work experience and training; the museums should be kept and enhanced</p>	<p>N</p>	<p>RiverOak welcomes the suggestions for site enhancements and whilst it cannot, at this time, confirm that these will be incorporated, it can confirm that they will be considered.</p> <p>However, RiverOak can confirm that it undertakes that training opportunities will be developed for young people living locally and that, subject to the operation of law, priority will be given to local people in terms of job opportunities and recruitment.</p> <p>In terms of museums, An area of approximately 3ha has been safeguarded in the DCO application for operation of the RAF Manston History Museum, Spitfire & Hurricane Memorial Museum and memorial garden. This area encompasses the current museums and memorial grounds and allows for additional areas in which the museums could be expanded or relocated. A decision on</p>

			whether to proceed with any relocation works will only be made after consultation with the museum operators to ensure that the museums' needs are reflected. A preliminary meeting was held between RiverOak and the museums on the 26 March 2018.
Alternative use	Having an airport here is better than housing; having housing here is better than an airport	N	As of January 2018, the Manston Airport site is no longer being promoted as a mixed use settlement for up to 2,500 new homes in the new draft Thanet Local Plan. Thanet District Council launched a 'Call For Sites' in February 2018 which invites anyone to submit details of a site that they consider suitable for development. This could include sites suitable for housing development which have not yet been considered by the Council that could absorb the 2,500 houses previously allocated at the airport. The Manston site is zoned for aviation use and reopening the airport will provide much needed employment opportunities in an area of relatively high deprivation. The Azimuth Report (document reference TR020002/APP/7.4) provides details of the case for reopening the airport in some depth and finds that there are no other airports that can be used to reduce the impact of UK airport capacity constraints on the freight market.
Business case and economic and employment benefits	The business case is flawed and an airport will not succeed just like in the past	N	The Azimuth Report (document reference TR020002/APP/7.4) provides a detailed case for the reopening of the airport. It is clear that the UK needs additional airport capacity. The evidence shows that air freight is particularly vulnerable to capacity constraints not only in the UK but also in Europe (see the Schiphol Airport example). Manston Airport zoned for aviation use, can provide some of the much-needed capacity almost immediately. RiverOak's planned investment in the airport would provide state-of-the-art facilities for freight, addressing many of the current difficulties experienced by freighter operators.

Community impact and compensation	The noise will have a negative impact on the local community and will affect house prices in the area	Y	<p>The potential noise effects resulting from the Proposed Development have been assessed in Chapter 12: Noise of the ES (document reference TR020002/APP/5.2-1). A summary of the significant residual effects is provided at Section 12.10. Based on this assessment, RiverOak has developed a Noise Mitigation Plan to reduce noise effects (document reference TR020002/APP/2.4). The impact of noise on wildlife, ecosystems and biodiversity is assessed in Chapter 7: Biodiversity of the ES (document reference TR020002/APP/5.2-1).</p> <p>RiverOak will compensate eligible landowners who can show that their properties have lessened in value due to the construction or operation of the airport when they come to sell them.</p>
Consultation	The consultation exercise was flawed; the consultation exercise was impressive	N	As set out in this Report, RiverOak believes its three stage consultation was robust and had an appropriate reach.
Disasters	There may be terrorism or accidents	Y	Chapter 17 of the ES (document reference TR020002/APP/5.2-3) sets out the assessment of the potential major accidents and disasters and the impact these may have.
Masterplan	There should be more trees protecting housing to the east; the northern grass plans are vague	N	We are already protecting houses on Manston Court Road with a buffer of landscaping; we cannot predict the airport-related businesses that will use the northern grass but have limited land use, heights and floorspace through a combination of commitments to detailed design (Requirement 4 of the draft DCO (document reference TR020001/APP/2.1), the engineering drawings and sections (particularly drawing 2060 which contains details of levels and floorspaces) (document reference TR020002/APP/11) and article 6 (limits of deviation) of the DCO. Landscaping commitments are secured through Requirement 10 of the.

Surface access	Upgrade to Spitfire Way junction welcome; lorries will blight the roads; there should be more attention to rail	N	<p>A Transport Assessment (document reference TR020002/APP/5.2-15) has been carried out and is reported on in Chapter 14 of the ES (document TR020002/APP/5.2-2). This assesses, amongst other things, operational junction capacity and puts forward suggestions for mitigating against impacts.</p> <p>As part of the Transport Assessment detailed junction models for 28 local junctions as well as all the access junctions to the site have been prepared to inform where junction mitigation proposals may be required.</p> <p>The junctions modelled include junctions in Broadstairs, Margate, Ramsgate and Manston, key A299 junctions and many others and include the key junctions along Spitfire Way.</p>
Environmental impacts including noise	Various comments about environmental impacts	N	All such comments are considered in greater detail dealt with under questions 2 and 4 below.

Table 11.9: Summary of issues raised in Stage 3 community consultation in response to Question 2 of the Feedback Form and how RiverOak had regard to the responses

Question 2: Do you have any comments on the additional environmental information provided?

Topic	Issue raised	Change? Y / N	Regard had to response
General support	44 respondents were supportive of the Proposed Development but did not give any specific reasons for this.	N	RiverOak notes and welcomes this response.
General opposition	8 respondents were opposed to the Proposed Development but did not give any specific reasons for this.	N	RiverOak notes this feedback but disagrees.
Alternative uses	18 respondents commented on the possible alternatives for the site. All of these commented that use of the site for a cargo aircraft was preferable to its use for housing.	N	RiverOak notes and welcomes this response.
Assessment positive	29 respondents were positive about the assessment that had been undertaken. Comments centred mainly on the assessment being comprehensive, detailed and impressive although some respondents also stated that RiverOak had gone beyond what was required. 5 further respondents commented on the robustness of the environmental assessment and that care had been	N	RiverOak notes and welcomes this response.

	taken to ensure compliance with the EIA Regulations 2017.		
Assessment criticism	<p>9 respondents criticised the environmental assessment provided for the 2018 statutory consultation. The criticism included the following:</p> <ul style="list-style-type: none"> - environmental information has 'whitewashes' - flawed and skewed report - information is misleading as peak period is not taken into account - little or no analysis has focussed on Herne Bay - no realistic assessment of the impact of cars on the road network <p>1 respondent queried whether the assessment was robust enough to comply with these regulations.</p>	Y	The assessments provided within the ES (document reference TR020002/APP/5.2-1 – 5.2-15) have been undertaken in accordance with the appropriate legislation and current best practice guidance, alongside consultation with statutory consultees who have advised upon assessment methodologies.
Consultation and engagement	<p>75 respondents commented on the 2018 statutory consultation process and the documentation provided. Of these, 30 comments stated that the consultation was not good enough with reasons including:</p> <ul style="list-style-type: none"> - documentation being inaccessible and too complicated; - not enough information provided; - consultation period was too short; - not having been made aware of the consultation; 	N	RiverOak believes the consultation to have been robust and comprehensive, acknowledging the stage that the project development had reached and that there had been two previous consultations.

	<ul style="list-style-type: none"> - inconsistencies in documentation relating to night flights; - not enough information on flight paths; and - not enough information on the impact on schools, businesses and tourists. <p>The remaining 45 comments stated that the consultation had been carried out well and that the information provided was thorough and well researched.</p>		
Environment – general positive	23 respondents commented that there would be no significant impact or that the benefits of the airport would outweigh any impact	N	RiverOak welcomes this feedback.
Environment – general negative	19 respondents commented that the airport would have a negative impact on the environment.	N	RiverOak notes this feedback but disagrees. A full environmental impact assessment has been carried out which has identified both the potential benefits and impacts of the Proposed Development. This is set out in full detail in the ES (document reference TR020002/APP/5.2-1 – 5.2-15).
Environment – noise	<p>31 respondents raised concerns about the noise impact of the Proposed Development. Concerns included:</p> <ul style="list-style-type: none"> - effect of night flight noise on sleep; - noise sensitive buildings will need to be looked after; - a complaint that Figures 12.1 and 12.2 were difficult to view and therefore it was not clear where noise receptors were; 	Y	The Quota Count in the Noise Mitigation Plan (document reference TR020002/APP/2.4) has been reduced by nearly 50%.

	<p>- the effect of noise on Pegwell Bay;</p> <p>- area identified for noise mitigation and compensation is too small;</p> <p>12 respondents stated that the noise wouldn't be a problem and that it hadn't been before when the airport was previously operational.</p> <p>A further 11 respondents had specific comments about aircraft. 7 of these commented that they had no issue with the airport opening as aircraft were now quieter and more efficient than they used to be. 2 respondents stated that you couldn't make cargo aircraft quiet enough, 1 requested information about the cargo carrying capacity of different aircraft and 1 suggested the use of turboprop aircraft to lessen the environmental impact.</p>		
Environment – air quality	<p>29 comments were raised about air quality. 28 of these raised concerns about the impact the Proposed Development and associated road traffic would have on air quality, pollution and associated health and quality of life, and 1 respondent commented that they were happy that air quality was seen as a top priority by the promoter.</p>	N	<p>The air quality effects resulting from the Proposed Development have been assessed in Chapter 6: Air Quality of the ES (document reference TR020002/APP/5.2-1). The assessment shows that air quality will remain comfortably within legal limits. These legal limits are themselves based on World Health Organization guidance on health effects, allowing for the most vulnerable members of society. The air quality impacts of the airport are small and confined to the vicinity of the airfield and certain major roads. The impact of air quality on wildlife, ecosystems and biodiversity is assessed in Chapter 7: Biodiversity of the ES (document reference TR020002/APP/5.2-1) and is shown to be not significant.</p>

Environment – landscape	4 respondents commented on the impact of the Proposed Development on the landscape. 2 of these commented that the plans seemed to address the impact appropriately, 1 commented that there is a SSSI in Sandwich under the flightpath, and 1 raised concerns about the Northern Grass area being concreted over.	N	<p>The aircraft flight paths are to the north of Sandwich Bay. The impacts of noise from aircraft flight paths on the Sandwich Bay to Hacklinge Marshes SSSI are addressed in Chapter 7 of the ES (document reference TR020002/APP/5.1-2) and, as this designated site forms the constituent SSSI of the Thanet Coast and Sandwich Bay Special Protection Area (SPA), in the Report to Inform the Appropriate Assessment, Appendix 7.1 (document reference TR020002/APP/5.2-6). The conclusions of the assessments in these documents reveal no adverse effects on the birds of the SSSI/SPA from disturbance resulting from the noise of aircraft.</p> <p>As a result of the assessment in Chapter 7 Biodiversity of the ES (document reference TR020002/APP/5.2), any necessary off site mitigation will be reserved for onsite wildlife before construction commences, some of which may use the Northern Grass area. Information about this compensation is provided in Chapter 7 Biodiversity.</p>
Environment – water	8 people commented about the potential impact on water. Of these, 3 raised concerns about the potential impact on the aquifer and 4 commented that they were pleased to see that this topic was well covered in the 2018 PEIR. 1 responded that the management of discharge should be a continuing concern going forward.	N	<p>The potential impact on the water environment is discussed in Chapter 8 of the ES (document reference TR020002/APP/5.2-1) and the impact on the aquifer assessed in more detail in Appendix 8.1 (document reference TR020002/APP/5.2-7). Future discharges from the site will be managed going forward.</p>
Environment - wildlife	10 people commented about wildlife. Comments generally raised concerns about the impact on wildlife but also included:	N	<p>Chapter 7: Biodiversity of the ES (document reference TR020002/APP/5.2-1) addresses impacts upon wildlife on the Proposed Development site. It identifies those species (e.g. skylark) or groups of species (e.g. bats and reptiles), where impacts will be adverse. As a consequence, off-site mitigation will be reserved and if</p>

	<ul style="list-style-type: none"> - information that bats live in the Northern Grass area and that owls live in the tree lined area to the rear of Manston Court Road properties; - concern about disruption to the Pegwell Bay nature reserve; and - concern that concreting over the site and reopening the airport will drive wildlife, such as hares, away from the site. 		<p>it is needed, construction will not commence until it has been provided.</p> <p>The assessments of Pegwell Bay have concluded, because of the location of flight paths and consequent noise levels over Pegwell Bay, that there will not be disturbance to the wildlife of the nature reserve.</p>
Environment – light	<p>3 respondents commented on light pollution as follows:</p> <ul style="list-style-type: none"> - airport will add to light pollution which is already bad due to Thanet Earth (2); and - has the effect of the lighting from Thanet Earth been taken into account as pilots may be blinded by this lighting (1). 	Y	<p>A lighting scheme for the Proposed Development will form part of the detailed design process and, within the confines of the CAA regulations for airports, that scheme would adopt lighting principles that seek to minimise light spill. It is likely that such measures would primarily be applied to the airport related development on the Northern Grass area and any landside components of development that are not the subject of specific lighting design requirements. The lighting scheme will provide additional information to supplement, but not supersede, the assessments made in Chapter 11 Landscape and Visual of the ES (document reference TR020002/APP/5.2-2).</p>
Environment – climate change	<p>1 respondent asked how a new cargo airport impacts on climate change and the Paris Agreement in the short, medium and long term.</p>	N	<p>Greenhouse gas emissions from the Proposed Development and the associated impact on the UK's climate change target has been assessed in Chapter 16 of the ES (document reference TR020002/APP/5.2-2). A Carbon Minimisation Action Plan has been committed to. This will reduce the impact of the Proposed Development on the climate where practicable.</p>
Environment – mitigation	<p>25 respondents commented on environmental mitigation. Of these, 12 stated that they were happy with the mitigation proposals currently proposed. The remaining 13 comments related to general concerns</p>	N	<p>All mitigation relating to the Proposed Development is outlined with the specific technical Chapters (Chapters 6-17) of the ES (document reference TR020002/APP/5.2-1 – 5.2-3). Additionally, specific mitigation requirements are also outlined within the CEMP</p>

	<p>about whether mitigation of the impact would be possible, but there were also some specific comments made:</p> <ul style="list-style-type: none"> - request from Manston Thorne to ensure dust control measures for construction phases to ensure PV plant to the south of the runway is not adversely affected; - suggestion that the airport should support environmental charities; and - an airport would not have any greater impact than allowing housing on the site. 		<p>(Appendix 3.2 of the ES (document reference TR020002/APP/5.2-6)). All mitigation has been developed using current best practice guidance.</p>
Health impacts	<p>19 respondents commented on possible health impacts of the Proposed Development. Many of these were general in nature stating simply that the development would have a negative effect on health but there were some specific comments including:</p> <ul style="list-style-type: none"> - Dungeness Atomic Power Plant is nearby – they should be consulted due to possible effect of an accident; - the negative effect of night flights on individual's health; and - there is no information about how the population of Thanet will be protected from NO2 emissions. 	N	<p>A major accidents and disaster Chapter (Chapter 17) and a health Chapter (Chapter 15) have been included in the ES setting out the environmental impacts of the project in these areas (document reference TR020002/APP/5.2-2 and 5.2-3).</p>
Night flights	<p>16 respondents commented on night flights. 13 of these were comments about the negative impact of night flights on tranquillity, environment, health and pollution. The remaining 3 comments were in relation to RiverOak being dishonest about night flights, the impact of night</p>	N	<p>The Health Impact Assessment, Appendix 15.1 of the ES (document reference TR020002/APP/5.2-13) assesses the potential health impacts associated with changes in noise and air pollution. Where adverse effects are predicted, measures to mitigate these are set out</p>

	flights not having been assessed properly and the inconsistency of information given about night flights.		in the Noise Mitigation Plan (document reference TR020002/APP/2.4) . RiverOak is proposing a night time policy which imposes movement limits combined with measures to reduce noise. Further information can be found in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4) .
Flight paths	5 respondents raised concerns about flight paths. These concerns were as follows: - would like to see the proposed flight paths; - the flightpath over Herne Bay would mean that there were 36 flights a day and an additional 8 at night; - flight path is too close to densely populated residential areas which form summer holiday resorts; and - flights should take off and land from the east.	N	RiverOak has assessed flight 'swathes' and local residents can be reassured that the flights will be kept to those swathes. Should the applied for DCO be granted, RiverOak will develop and submit an ACP to the CAA. Under the ACP, the CAA will expect the airport to develop proposals which seek to quantify and minimise environmental impact. The process includes a further round of environmental impact assessments and public consultation on the specific flightpaths being proposed. Proposed flightpaths will have to be within the proposed swathes; if RiverOak wishes to propose flightpaths which are beyond these then we will have to apply to amend the DCO to match them. The proposals under ACP, will be optimised, wherever possible, to reduce flight noise disturbance to the underlying community. Such proposals will also consider how procedures are to be utilised; i.e. runway direction.
Community Impact – General	20 respondents commented that there would be negative impact on the community. The negative impacts were categorised as: - depreciation of property values; - traffic congestion; and - increase in HGV traffic	N	The Transport Assessment (document reference TR020002/APP/5.2-15) provided to support this DCO application provides a detailed assessment of the traffic impacts (and HGVs) and provides mitigation where required. RiverOak will compensate landowners who can show that their properties have lessened in value due to the construction or operation of the airport when they come to sell them, according to the national compensation code.

<p>Community Impact – Compensation</p>	<p>7 respondents commented on the compensation provisions detailed in the 2018 statutory consultation materials. These comments related to two things:</p> <ul style="list-style-type: none"> - the concern over the ability to protect Ramsgate’s over 400 listed buildings; and - concerns respondents had about not being adequately compensated. 	<p>N</p>	<p>The compensation contour was chosen as the larger of the 63dB daytime and 55dB night time noise contours based on advice from RiverOak’s valuation experts CBRE.</p>
<p>Employment</p>	<p>2 respondents commented on employment. One of these stated that the airport would be welcome as it will create jobs for the younger generation, whilst the other commented that the airport would cause the loss of jobs in hospitality and leisure.</p>	<p>N</p>	<p>RiverOak is keen to ensure training and education opportunities are in place to assist local people, particularly the young, to prepare for the employment opportunities that would be provided by the Proposed Development.</p> <p>The Azimuth Report (document reference TR020002/APP/7.4) and Chapter 13 of the ES (document reference TR020002/APP/5.2-2) show that there is unlikely to be a loss of employment in hospitality and leisure. It is more likely that the need for these services would increase with the operation of the airport.</p> <p>It is estimated that the airport will result in 6,151 indirect /induced job opportunities. While it is not possible at this stage to determine which sectors will benefit, it is likely that the hospitality and leisure industry will be part of this.</p> <p>For the 587 tourism businesses within the surrounding area, the increased visitor numbers in conjunction with increased incomes from employees at Manston will likely lead to increased demand for tourism facilities and associated spending in the locality. This could result in improvements to their volume of trade.</p> <p>As an example, there are potential beneficial effects associated with use of local accommodation (e.g. hotels / hostels / B&Bs within surrounding communities of Sandwich, Manston, Ramsgate, and</p>

			Margate). There may be a rise in demand for short stay accommodation, for instance, from passengers staying overnight prior to their flight
Heritage	There were 8 comments about heritage. These centred around criticism of there not being enough information or assessment of the impact on the local heritage, although one specific comment related to the suggestion that the Spitfire museum should be looked after.	N	<p>Impacts on heritage assets have been assessed and are reported in Chapter 9: Historic Environment of the ES (document reference TR020002/APP/5.2-1) which includes a full desk based assessment at Appendix 9.1 (document reference TR020002/APP/5.2-8 and 5.2-9). The assessment process has been undertaken in line with relevant policies and legislative requirements (see Chapter 9: Historic Environment, Section 9.2) and appropriate mitigation measures are proposed in Sections 9.8-9.10 of Chapter 9: Historic Environment.</p> <p>An area of approximately 3ha has been safeguarded in the DCO application for operation of the RAF Manston History Museum, Spitfire & Hurricane Memorial Museum and memorial garden. This area encompasses the current museums and memorial grounds and allows for additional areas in which the museums could be expanded or relocated. A decision on whether to proceed with any relocation works will only be made after consultation with the museum operators to ensure that the museums' needs are reflected. A preliminary meeting was held between RiverOak and the museums on the 26 March 2018.</p>
Surface Access	11 respondents raised the issue of surface access: 9 in relation to road and 2 in relation to rail. The comments relating to rail centred on the suggestion that rail access to the airport should be looked at as part of this proposal. Those relating to road were split 5 to 4 with 5 stating that the road network in the area is not up to handling the increased number of cargo vehicles and 4	N	<p>A Transport Assessment (document reference TR020002/APP/5.2-15) has been carried out and is reported on in Chapter 14 of the ES (document TR020002/APP/5.2-2). This assesses, amongst other things, operational junction capacity and puts forward suggestions for mitigating against impacts.</p> <p>As part of the Transport Assessment detailed junction models for 28 local junctions as well as all the access junctions to the site have been</p>

	<p>stating that the proposed improvements to the network are welcome.</p>		<p>prepared to inform where junction mitigation proposals may be required.</p> <p>The junctions modelled include junctions in Broadstairs, Margate, Ramsgate and Manston, key A299 junctions and many others and include the key junctions along Spitfire Way.</p> <p>RiverOak welcomes plans for a new railway station to the south-east of the site although they do not form part of its own proposals due to the station currently being only an aspirational development. If such a station is developed RiverOak will consider how best use could be made of it for freight and passengers.</p> <p>An Airport Surface Access Strategy (Appendix O of the Transport Assessment) has been prepared setting out detailed surface access measures proposed to improve the connectivity of the site.</p>
<p>Tourism</p>	<p>10 respondents commented on the fact that the Proposed Development would destroy tourism in Thanet and that there had been no attempt in the documentation to mitigate this impact.</p>	<p>N</p>	<p>The effects on tourism are discussed within Chapter 13: Socio-Economics of the ES (document reference TR020002/APP/5.2-2). Tourism receptors in the vicinity of the Proposed Development may experience effects resulting from the increased activity in the geographical area, in both construction and operational phases. For tourism businesses within the surrounding area, the increased visitor numbers associated with the airport operation, in conjunction with increased incomes from employees at Manston, will likely lead to increased demand for tourism facilities and associated spending in the locality. This could result in improvements to their volume of trade.</p> <p>In terms of indirect impacts, such as increased traffic, noise or dust, detailed assessments have been undertaken in Chapter 6: Air Quality, Chapter 12: Noise and Chapter 14: Traffic and Transport of the ES (document reference TR020002/APP/5.2-1 – 5.2-2). The negative effects on tourism are commonly observed to be related to noise and traffic.</p>

			<p>The effects of noise on tourist businesses will be minimal as the increase in urban areas will be small compared to existing sources. Aircraft noise will increase at the main beach in the centre of Ramsgate which is already subject to urban noise but there will be no noticeable noise increases at any other Kent beaches.</p> <p>Outside these areas the effects will depend on existing background levels but in general are considered sufficiently low not to affect the level of business activity or value. The site is well connected by road and rail and traffic increases are assessed to be minimal. The effects of traffic on tourism are considered to be low and will not affect the level of business activity or value.</p>
Promoter	<p>3 respondents commented about the promoter specifically:</p> <ul style="list-style-type: none"> - RiverOak is taking its responsibilities seriously; - RiverOak has spent millions, including on protecting the environment; and - Concern over RiverOak directors, shareholders and investors not being UK residents and therefore about the lack of transparency. 	N	<p>RiverOak takes its responsibilities seriously and is a bona fide UK company that has been committed to developing Manston Airport for a long time</p>
Business Case	<p>3 respondents commented on the business case. 2 of these challenged the business saying there was no evidence that the airport would be financially viable, whereas 1 person stated that the balance between effect on the environment and the financial viability was appropriate.</p>	N	<p>The Azimuth Report (document reference TR020002/APP/7.4) provides a detailed case for the reopening of the airport. It is clear that the UK needs additional airport capacity. The evidence shows that air freight is particularly vulnerable to capacity constraints not only in the UK but also in Europe (see the Schiphol Airport example). Manston Airport zoned for aviation use, can provide some of the much-needed capacity almost immediately. RiverOak's planned investment in the airport would provide state-of-the-art facilities for</p>

			freight, addressing many of the current difficulties experienced by freighter operators.
Consultees	Has the UK Atomic Energy Authority and EDF been consulted?	N	EDF Energy Customers plc and EDF Energy plc were consulted. The UK Atomic Energy Authority were not consulted.
Miscellaneous	<p>4 further comments were made as follows:</p> <ul style="list-style-type: none"> - a preference for a reduced quota version of the system operated by Gatwick; - there is a possibility of land contamination and unexploded ordnance on the site; - Southend Airport has been expanded with the help of Eddie Stobart and locals are happy with holiday flights; and - London City Airport operates in a densely populated area and noise is dealt with appropriately. 	Y	The Quota Count has been cut by nearly 50% since the consultation.

Table 11.10: Summary of issues raised in Stage 3 community consultation in response to Question 3 of the Feedback Form and how RiverOak had regard to the responses

Question 3: Do you have any comments on the additional areas we are assessing?

Topic	Issue raised	Change? Y / N	Regard had to response
Alternative proposals and additions to site	<p>19 respondents suggested alternative proposals. Some commented there was a greater need for housing than an airport, particularly in the area of Thanet. Others strongly disagreed with the housing proposal, citing increased traffic, waste and environmental issues and capacity issues with the schools.</p> <p>4 respondents made suggestions for additions to the site, including Manston as an alternative / emergency airport in the event that Gatwick / Heathrow are closed for bad weather.</p>	N	<p>As of January 2018, the Manston Airport site is no longer being promoted as a mixed use settlement for up to 2,500 new homes in the new draft Thanet Local Plan. Thanet District Council launched a 'Call For Sites' in February 2018 which invites anyone to submit details of a site that they consider suitable for development. This could include sites suitable for housing development which have not yet been considered by the Council that could absorb the 2,500 houses previously allocated at the airport. The Manston site is zoned for aviation use and reopening the airport will provide much needed employment opportunities in an area of relatively high deprivation. The Azimuth Report (document reference TR020002/APP/7.4) provides details of the case for reopening the airport in some depth and finds that there are no other airports that can be used to reduce the impact of UK airport capacity constraints on the freight market.</p> <p>RiverOak notes the comments relating to Manston being an alternative to the other London airports and can confirm that this has not been discounted.</p>
Assessment	<p>42 respondents commented on assessments generally.</p> <p>30 respondents provided positive feedback, with some stating the report was well thought out, thorough and robust, that it addressed all issues satisfactorily and that it covered environmental impact sufficiently. Others</p>	N	<p>The Environmental Statement (document reference TR020002/APP/5.2) is now complete and RiverOak believe it to be robust.</p>

	<p>commented RiverOak had taken on board the 2017 requirements and had responded in detail to these, as well as covering all aspects of climate change (including health), waste and accidents.</p> <p>7 respondents were critical of the assessments citing missing information (e.g. no health impact assessment) and comments that the whole site had not been thoroughly inspected. Some stated there was no consideration of long and short-term impacts on local people, schools, businesses and tourists and that the proposals did not cover night flights / the location of night flight paths or how forecasts were reached.</p> <p>5 respondents commented the assessment could be widened to include additional areas of importance (including safeguards to future operations and airport management team) and that constant on-going assessments are needed in respect of health and the environment.</p>		
Business case	<p>The majority of respondents (5/6) who commented on the business case were against the proposals stating reopening the airport would not be viable on the grounds of location, size of the airport, a small local population, overstretched motorways and an increase in noise / air pollution.</p> <p>1 respondent supported the proposals.</p>	N	<p>The Azimuth Report (document reference TR020002/APP/7.4) provides a detailed case for the reopening of the airport. It is clear that the UK needs additional airport capacity. The evidence shows that air freight is particularly vulnerable to capacity constraints not only in the UK but also in Europe (see the Schiphol Airport example). Manston Airport zoned for aviation use, can provide some of the much-needed capacity almost immediately. RiverOak's planned investment in the airport would provide state-of-the-art facilities for freight, addressing many of the current difficulties experienced by freighter operators.</p>

<p>Community Impact, Education & Tourism</p>	<p>25 respondents referenced the impact on the community and tourism.</p> <p>18 respondents thought that community and tourism would be negatively impacted. Issues cited included health impacts from pollution, noise and night flights, a decrease in property values, general disruption (such as disruption to schools, the economy and local businesses) and increase in traffic.</p> <p>5 respondents offered positive comments, stating the proposals could boost to the local economy, assist young people in finding work, could be transformative for the area generally and could facilitate increased travel to Europe and offer relief to the London airports.</p> <p>1 respondent referred to the impact on social services due to the increase in social housing. Further comments included impact on education and difficulties around recruitment and retention of high quality staff in schools.</p>		<p>The effects on tourism are discussed within Chapter 13: Socio-Economics of the ES (document reference TR020002/APP/5.2-2). Tourism receptors in the vicinity of the Proposed Development may experience effects resulting from the increased activity in the geographical area, in both construction and operational phases. For tourism businesses within the surrounding area, the increased visitor numbers associated with the airport operation, in conjunction with increased incomes from employees at Manston, will likely lead to increased demand for tourism facilities and associated spending in the locality. This could result in improvements to their volume of trade.</p> <p>In terms of indirect impacts, such as increased traffic, noise or dust, detailed assessments have been undertaken in Chapter 6: Air Quality, Chapter 12: Noise and Chapter 14: Traffic and Transport of the ES (document reference TR020002/APP/5.2-1 – 5.2-2). The negative effects on tourism are commonly observed to be related to noise and traffic.</p> <p>The effects of noise on tourist businesses will be minimal as the increase in urban areas will be small compared to existing sources. Aircraft noise will increase at the main beach in the centre of Ramsgate which is already subject to urban noise but there will be no noticeable noise increases at any other Kent beaches.</p> <p>Outside these areas the effects will depend on existing background levels but in general are considered sufficiently low not to affect the level of business activity or value. The site is well connected by road and rail and traffic increases are assessed to be minimal. The effects of traffic on tourism are considered to be low and will not affect the level of business activity or value.</p>
<p>Engagement Consultation</p>	<p>There was a mixed but balanced response to the consultation process and to how it was conducted. 65</p>	<p>N</p>	<p>As set out in this Report, RiverOak believes its three stage consultation was robust and had an appropriate reach.</p>

	<p>respondents offered comments on the consultation generally.</p> <p>32 of the respondents provided positive feedback, stating the consultation was very detailed, with convincing data and that RiverOak were thorough and had gone beyond what was required. Reference was made to use of competent experts and RiverOak were described as being proactive in their approach. Some commented that the documents provided were easy to understand and there had been an impressive level of in-depth detail covering some complex issues.</p> <p>28 of the respondents had issues with the consultation process and/or with the content of the consultation. Some respondents cited skewed and biased data and commented there had not been enough time to consider a meaningful consultation, whilst others took issue with there being missing information, lengthy documents and documentation which was evasive and difficult to comprehend. Some respondents made reference to there not having been a completed Health Impact Assessment.</p> <p>5 of the respondents provided neutral responses. Some of the respondents requested more summarised and searchable documentation.</p>		
Accidents / Disasters	10 respondents raised concerns over possible fatalities and injuries in the event of emergency landings, low flying cargo planes over a densely populated area and houses being located very close to the runway.	N	Chapter 17 of the ES (document reference TR020002/APP/5.2-3) sets out an assessment of major accidents, including air incidents. Emergency planning and preparedness would be developed and agreed as part of the EASA licensing and aligned to EASA/CAA requirements,

	Some respondents requested an assessment of the local emergency services and contingency plans in the event of a large-scale disaster.		
Environmental Impact and mitigation generally	<p>82 respondents made reference to the environment generally.</p> <p>53 respondents had concerns and referenced specific issues such as air quality and pollution, noise, smell, light, soot, waste, climate change, damage to wildlife and birds, ground water contamination and water runoff from the runway as key issues. Some respondents felt the Proposed Development is too damaging and that the natural environment will suffer significantly. Other respondents raised concerns that older, heavy cargo planes are highly polluting and that planes generally are not subject to such tight regulation in respect of pollution. Reference to increased air pollution from the increased freight traffic would be a big issues.</p> <p>26 respondents provided positive feedback, stating RiverOak are paying careful attention to the environment, that the adverse impacts had been assessed carefully and that RiverOak had made excellent provision for the issues in hand. Reference was also made to RiverOak showing commitment to protecting the environment through the inclusion of the EIA regulations 2017.</p> <p>3 respondents provided neutral responses.</p>	N	A full environmental impact assessment has been carried out which has identified both the potential benefits and impacts of the Proposed Development. This is set out in full detail in the ES (document reference TR020002/APP/5.2).

Climate change	<p>12 respondents commented directly on climate change and stated that a full climate change assessment is needed.</p> <p>9 respondents flagged concerns around climate change.</p> <p>3 respondents stated they did not believe climate change would be adversely affected and that moving cargo from lorries to planes would have a positive impact on climate change.</p>	Y	Chapter 16 of the ES (document reference TR020002/APP/5.2-2) assesses the potential impact of the Proposed Development on climate change. Greenhouse gas emissions from the Proposed Development and the associated impact on the UK's climate change target has been assessed. A Carbon Minimisation Action Plan has been committed to. This will reduce the impact of the Proposed Development on the climate where practicable.
Light	1 respondent cited that light pollution will reduce quality of life.	N	This is not believed to be the case
Noise	<p>9 respondents commented on noise specifically.</p> <p>7 respondents raised concerns around noise, specifically that local residents and those living under the flight path would be subject to extreme levels of noise, in excess of 60DB, which would have a detrimental effect on health. Some respondents stated they would be subject to an intolerable level of disruption. Comments also included reference to cargo planes being heavy and noisy and some respondents queried whether the noise impact on those directly under the flight path had been measured.</p> <p>2 respondents stated they had no concerns around noise at all.</p>	Y	The potential noise effects resulting from the Proposed Development have been assessed in Chapter 12: Noise of the ES (document reference TR020002/APP/5.2-1). A summary of the significant residual effects is provided at Section 12.10. Based on this assessment, RiverOak has developed a Noise Mitigation Plan to reduce noise effects (document reference TR020002/APP/2.4). The impact of noise on wildlife, ecosystems and biodiversity is assessed in Chapter 7: Biodiversity of the ES (document reference TR020002/APP/5.2-1).
Air	13 respondents commented on air pollution and air quality.	N	The air quality effects resulting from the Proposed Development have been assessed in Chapter 6: Air Quality of the ES (document reference TR020002/APP/5.2-1). The assessment shows that air

	<p>10 respondents raised concerns such as heavy air traffic, pollution from planes and particulate pollution in respect of chemical changes to the atmosphere. Reference was also made to older, heavy cargo planes being more polluting. It was also stated that cargo planes flying over highly populated areas would carry a higher pollution risk and were not environmentally friendly. Other comments focused on the increase in freight traffic and the consequential rise in air pollution from a significant increase in lorries on the road.</p> <p>1 respondent requested a study in relation to levels of soot.</p> <p>2 respondents commented that modern aircraft operate in a more fuel efficient way and are less polluting.</p>		<p>quality will remain comfortably within legal limits. These legal limits are themselves based on World Health Organization guidance on health effects, allowing for the most vulnerable members of society. The air quality impacts of the airport are small and confined to the vicinity of the airfield and certain major roads. The impact of air quality on wildlife, ecosystems and biodiversity is assessed in Chapter 7: Biodiversity of the ES (document reference TR020002/APP/5.2-1) and is shown to be not significant.</p> <p>Soot has not been assessed in its own right, but particulate matter (PM₁₀ and PM_{2.5}) is included in the air quality assessment, including from aircraft and road vehicles and including brake and tyre wear, and so is dust from construction activities.</p>
Waste	<p>The response on waste was balanced. 4 respondents commented on waste specifically.</p> <p>3 respondents stated waste was a major factor as there would be massive waste disposal. Concerns also related to waste from aircraft recycling.</p> <p>1 respondent stated environmental waste would be higher with more housing.</p>	N	<p>Information concerning waste is discussed within Chapter 3 Description of the Proposed Development of the ES (document reference TR020002/APP/5.2-1). It is also additionally covered within the CEMP (Appendix 3.2 of the ES (document reference TR020002/APP/5.2-6)).</p>
Smell	<p>1 respondent commented on the smell from heavy cargo planes.</p>	N	<p>The impact of odour from the airport has been assessed in Appendix 6.4 to Chapter 6: Air Quality in the ES (document reference TR020002/APP/5.2-1).</p>
Employment	<p>1 respondent stated the proposals would provide much needed employment in the local area.</p>	N	<p>The beneficial effects upon employment are discussed within Chapter 13 Socio-Economics of the ES (document reference TR020002/APP/5.2-2).</p>

Flight paths	<p>6 respondents made reference to flight paths.</p> <p>The majority of respondents referenced flight paths in a negative way. Some queried why there was no indication of the routes of the flight paths and 1 respondent asked whether the effects of noise under the flightpaths and sleepless nights had been considered. Others queried whether the 42 schools under the flightpath would be insulated.</p> <p>1 respondent stated they lived under existing flight path and had no issue with the plans at all.</p>	N	<p>RiverOak has assessed flight 'swathes' and local residents can be reassured that the flights will be kept to those swathes. Should the applied for DCO be granted, RiverOak will develop and submit an ACP to the CAA. Under the ACP, the CAA will expect the airport to develop proposals which seek to quantify and minimise environmental impact. The process includes a further round of environmental impact assessments and public consultation on the specific flightpaths being proposed. Proposed flightpaths will have to be within the proposed swathes; if RiverOak wishes to propose flightpaths which are beyond these then we will have to apply to amend the DCO to match them. The proposals under ACP, will be optimised, wherever possible, to reduce flight noise disturbance to the underlying community.</p> <p>Such proposals will also consider how procedures are to be utilised; i.e. runway direction.</p>
General Opposition	<p>7 respondents were generally opposed to the proposals. Reference was made to reopening of airport as being a backwards step for the area, with negative impacts.</p>	N	<p>RiverOak notes this comment but disagrees.</p>
General Support	<p>56 respondents were generally in support of the proposals.</p> <p>Reasons for support varied from the runway being a big asset to the UK because it can carry 747s, to the runway being capable of use in emergency landings. Comments extended to support of passenger flights and making Manston an international airport to relieve Heathrow and Gatwick. Other comments referenced</p>	N	<p>RiverOak notes and welcome this response.</p>

	the proposals as being a great benefit, well thought out and excellent for the additional areas. 2 respondents stated that had every confidence in the business case.		
Health and Safety	<p>4 respondents commented on health and safety issues and the response was very balanced.</p> <p>2 respondents cited concerns, including more accidents on the road and the risk of migratory birds as a potential hazard to flights.</p> <p>2 respondents commented that the level of risk would not change and that they were confident that modern regulations would be safe.</p>	N	This is assessed in Chapter 17 of the ES (document reference TR020002/APP/5.2-3). The design of the Proposed Development will ensure these risks are reduced to As Low As Reasonably Practicable.
Health impacts	<p>36 respondents commented on health impacts.</p> <p>32 respondents flagged concerns around health issues and the negative impact the proposals would have on health and general wellbeing for those living near / under the flight path. The key issues referenced air and noise pollution and the long term health issues associated with increased levels of these pollution types of pollution. References were made to increases in stress and anxiety, heart disease, shorter life expectancies, increases in deaths, cancer, strokes, asthma, sleep deprivation, and mental illness. The general response was the health and wellbeing of the local people would be significantly at risk from the proposals.</p> <p>1 respondent stated the development is unlikely to have an adverse impact on health.</p>	N	The Health Impact Assessment, Appendix 15.1 of the ES (document reference TR020002/APP/5.2-13) assesses the potential health impacts associated with changes in noise and air pollution. Where adverse effects are predicted, measures to mitigate these are set out in the ES and the Noise Mitigation Plan (document reference TR020002/APP/2.4).

	3 respondents provided a neutral response.		
Heritage	2 respondents commented on the negative impacts that the proposals would have on heritage. Reference was made to the significant number of listed buildings.	N	<p>Impacts on heritage assets have been assessed and are reported in Chapter 9: Historic Environment of the ES (document reference TR020002/APP/5.2-1). The assessment process has been undertaken in line with relevant policies and legislative requirements (see Section 9.2 of Chapter 9: Historic Environment) and appropriate mitigation measures are proposed in Sections 9.8-9.10 of Chapter 9: Historic Environment.</p> <p>The assessment includes consideration of indirect effects on off-site designated heritage assets with the potential to be affected, including conservation areas and listed buildings (Chapter 9: Historic Environment, Section 9.10, Appendix 9.5 and in the desk based assessment at Appendix 9.1 (document reference TR020002/APP/5.2-8 - 5.2-10).</p>
Night flights	9 respondents commented on night flights. All of the comments raised concerns, specifically that night flights should be kept to a minimum to reduce health impacts. Reference was also made to noise (particularly at night), quality of life, damage to tourism, a lowering of life expectancy and an impact on wildlife.	Y	RiverOak is proposing a night time policy which imposes movement limits combined with measures to reduce noise. Further information can be found in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4), in which the quote account has been cut by nearly 50% since the consultation
Promoter	3 respondents referenced concerns over the Proposed Development team and the accountability of the owners of the relevant companies being outside of the UK / registered offshore.	N	The project team consists of individuals with a track record of investment supported by well-regarded consultants
Quality of Life	1 respondent commented the proposals would impact negatively on the quality of life of the local people.	N	RiverOak believe that the benefits of the project considerably outweigh its adverse impacts

Respondent content	8 respondents commented they had no problem with the content of the proposals and that the issues had been addressed adequately.	N	RiverOak notes and welcomes this response.
Site Operations	2 respondents gave negative feedback in respect of site operations, referencing a need for fuel to be moved across the site by tanker and the associated potential for accidents.	N	The benefit of having airside fuel bowzers which do not use the public highway network outweighs the operational constraints of having vehicles cross the runway. Additionally an airfield perimeter track will be installed although bowser use of this is not currently envisaged. This is assessed in Chapter 17 of the ES (document reference TR020002/APP/5.2-3). The design will ensure these risks are reduced to As Low As Reasonably Practicable.
Surface access road / rail	10 respondents commented on the impact on the local travel infrastructure. Some respondents queried whether a transport plan had been considered. Other respondents commented that freight needing to be transported to and from the airport would lead to an increase in noise and pollution generally. Reference was also made to Operation Stack. 2 respondents stated the proposals could result in improvements in rail and road connections.	N	A Transport Assessment (document reference TR020002/APP/5.2-15) has been carried out and is reported on in Chapter 14 of the ES (document TR020002/APP/5.2-2). This assesses, amongst other things, operational junction capacity and puts forward suggestions for mitigating against impacts. The Department for Transport is working with Highways England on an alternative lorry area that will not require the use of Manston Airport As part of the Transport Assessment detailed junction models for 28 local junctions as well as all the access junctions to the site have been prepared to inform where junction mitigation proposals may be required. The junctions modelled include junctions in Broadstairs, Margate, Ramsgate and Manston, key A299 junctions and many others and include the key junctions along Spitfire Way.
Traffic	7 respondents made reference to traffic. 6 respondents raised concerns around there being too many HGVs on the road already, stating existing roads	N	As stated above, a Transport Assessment (document reference TR020002/APP/5.2-15) has been carried out and is reported on in

	<p>could not cope with the current traffic levels. Comments were made around increased traffic generally and a reduced quality of life.</p> <p>1 respondent commented they had no concerns with traffic provided that lorries and traffic were kept to existing routes.</p>	<p>Chapter 14 of the ES (document TR020002/APP/5.2-2). This assesses, amongst other things, operational junction capacity and puts forward suggestions for mitigating against impacts.</p> <p>As part of the Transport Assessment detailed junction models for 28 local junctions as well as all the access junctions to the site have been prepared to inform where junction mitigation proposals may be required.</p> <p>The junctions modelled include junctions in Broadstairs, Margate, Ramsgate and Manston, key A299 junctions and many others and include the key junctions along Spitfire Way.</p> <p>An Airport Surface Access Strategy (Appendix O to the Transport Assessment) has been prepared setting out the proposed improvements to access to the airport, and a Travel Plan (Appendix L of the Transport Assessment) has also been included to support the DCO application.</p>
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Table 11.11: Summary of issues raised in Stage 3 community consultation in response to Question 4 of the Feedback Form and how RiverOak had regard to the responses

Question 4: Do you have any comments on the Noise Mitigation Plan that RiverOak has published as part of this consultation?

Topic	Issue raised	Change? Y / N	Regard had to response
Additions to site	1 respondent supports re-introduction of a flying school	N	This is unlikely to be compatible with a busy freight airport
Alternative use	1 respondent asks that we consider Thanet Local Plan	N	The saved policies in the 2006 adopted Thanet Local Plan protect the Manston Airport site for airport uses. The Proposed Development is entirely in accordance with this policy which has been proved by a Planning Inspector to be up-to-date (see Lothian Shelf Limited planning appeals decision dated July 2017).
Business case-challenge	1 respondent said the plan is not viable	N	The Azimuth Report (document reference TR020002/APP/7.4) provides a detailed case for the reopening of the airport. It is clear that the UK needs additional airport capacity. The evidence shows that air freight is particularly vulnerable to capacity constraints not only in the UK but also in Europe (see the Schiphol Airport example). Manston Airport zoned for aviation use, can provide some of the much-needed capacity almost immediately. RiverOak's planned investment in the airport would provide state-of-the-art facilities for freight, addressing many of the current difficulties experienced by freighter operators.
Compensation	7 respondents said that the compensation offered is insufficient, should be provided to a wider area or trigger level reduced. 1 said that averaging the dB levels was trying to avoid paying compensation. 2 commented on	N	RiverOak has taken expert advice from CBRE on which properties may have successful compensation claims.

	<p>ineffectiveness of sound proofing. 1 commented that Heathrow are offering Hounslow £700 million. 1 said that consideration should be given to people who work shifts</p> <p>1 said that the compensation scheme seems fair and that people will get used to overhead noise.</p>		
Consultation and engagement	23 respondents commented on the consultation. Of these 10 stated that the consultation was inadequate while the others provided a mixture of individual comments relating to suggestions such as providing consultees with a headset with aircraft noise so people can see how loud it would be.	Y	As set out in this Report, RiverOak believes its three stage consultation was robust and had an appropriate reach.
Public transport	1 respondent said not enough information on public transport improvements	N	Improving public transport is an important element of the public access proposals and is included within The Airport Surface Access Strategy, Public Rights of Way Management Plan and Travel Plan appended to the Transport Assessment (document reference TR020002/APP/5.2-15). These documents define the proposals for public access and any improvements to the local public transport and public access offering, including pedestrian provision and road network improvements.
Employment	4 respondents said that re-opening the airport will be positive for employment opportunities	Y	RiverOak agrees and notes that effects on employment are discussed within Chapter 13 Socio-Economics of the ES (document reference TR020002/APP/5.2-2).
Environmental concerns	2 had no concerns. 1 said would be helpful if mature trees could be planted on perimeters to minimise noise distribution. 1 said impacts had been glossed over.	Y	Tree planting does not provide effective mitigation in relation to noise and is problematic in relation to the operational parts of the Proposed Development due to the safety implications of birds which may be attracted by the majority of native species of tree. Landscape planting has been considered in relation to mitigation of visual effects,

			<p>particularly with regard to the Northern Grass development proposals.</p> <p>The Proposed Development design (including the Northern Grass development proposals) has evolved through an iterative process of dialogue between the environmental assessment and Proposed Development design teams. The visual effects identified as requiring mitigation and the resultant measures incorporated into the design are set out in Chapter 11 Landscape and Visual, Table 11.11 of Chapter 11 of the ES (document reference TR020002/APP/5.2-2).</p>
Flight path	<p>4 respondents said flight paths should be changed. 3 said that the noise under the flight path would be ok. 1 said people had chosen to live in the flight path. 1 said previously planes used to fly over despite not being under the flight path. 1 asked about airspace change process. 3 wanted more information on flight paths. 2 commented on impact on noise for those living under the landing approach. 1 said no level of mitigation can help Ramsgate as it is under the flight path. 1 asked if impact of people living under the flight path had been measured. 1 said noise will be unacceptable. 2 commented on types of aircraft. 1 said lack of information. 1 said summer weather gives more opportunity to come in from the west. 1 said retaining runway bias towards Herne Bay for take-offs and landings essential. 1 said should not have flight paths over populated schools, villages or businesses.</p>	Y	<p>Flight paths have been assessed as 'swathes' in the Environmental Statement and will be refined within those swathes via an airspace change proposal to the CAA, expected to commence shortly after the DCO application has been accepted. Noise from aircraft has been assessed in the ES and controlled via the Noise Mitigation Plan (document reference TR020002/APP/2.4), a series of commitments that must be adhered to.</p>
General opposition	9 were in general opposition	N	RiverOak notes this feedback but disagrees.

General Support	49 were in general support	N	RiverOak notes and welcomes this feedback.
Health & Safety	1 said nearby migratory bird routes (black bellied Brent Geese last autumn for e.g.) would be a hazard. 1 said road safety a concern with increase in HGV's 1 said confident health and safety would be rigorously adhered to	Y	Although bird strike is an issue at airports, this has been assessed in the environmental statement and is not expected to be significant.
Health	7 said they were concerned about effect on sleep. 1 said they have never had their sleep disturbed by planes. 6 said that they were concerned about the impact on health. 1 asked if we will pay for additional hospitals to cope with increase in patients suffering from stress, coronary and cardiovascular disease.	Y	The Health Impact Assessment (Appendix 15.1) and Chapter 15: Health and Wellbeing of the ES (document reference TR020002/APP/J) have assessed potential effects on physical and mental health. Where adverse effects are predicted, measures to mitigate these are set out in the ES (document reference TR020002/APP/5.2-2). No significant effect on sleep disturbance is predicted due to the anticipated low number and noise of night-time flights.
Night flights	61 respondents made comments about night flights. The majority of these raised concerns about the noise and the frequency of these flights with 12 respondents requesting that there be no night flights at all.	Y	RiverOak understands that this is a worry for some respondents and is therefore proposing a night time policy which imposes movement limits combined with measures to reduce noise. Further information can be found in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4). This Noise Mitigation Plan was consulted upon during the 2018 statutory consultation and has been amended as a result of feedback received to incorporate further mitigation measures to reduce the effects of noise.

Noise Mitigation Plan- negative	18 said the NMP was inadequate/not easy to read. 3 said residents of Herne bay ignored. 1 said Operators should be "required" to operate low power/low drag procedures. 1 said should establish NPRs before airport operational. 2 said averaging noise bears no relation to actual noise disturbance. 1 said Minster and Monkton not included. 1 said no attempt made to mitigate noise. 1 said reality is that there will be old noisy planes. 1 said lives will be blighted by capacity of the airport. 5 said noise affects uncertain. 1 said Ramsgate will experience sound levels in excess of 60dB. 1 said ridiculous to think homes etc. will not be blighted. 2 said impossible to mitigate. 1 said monitoring of 6.5km does not go far enough. 1 said slanted in airports favour. 1 said will be a problem for Ramsgate. 1 said only location where noise assessment carried out was a narrow strip of land between the railway and A299. 1 said doesn't say how conclusions reached. 1 said large amount of information missing or deliberately concealed. 1 said no faith in noise information. 1 said not credible.	Y	The Noise Mitigation Plan has been revised and tightened as a result of the consultation responses.
Noise Mitigation Plan- neutral	1 said they had no issues	N	RiverOak notes this response.
Noise Mitigation Plan- positive	73 responded in total to say they were content with the NMP/had no concerns including: 1 saying they would suffer less than with previous operation; 1 saying in line with other airports; 1 said plan should be re-visited annually;	Y	RiverOak notes and welcomes this response.

Noise Mitigation Plan- query	1 said Broomfield not mentioned and wants to know why. 1 said no mention of continuous descent approach and no transparency in noise monitoring. 1 wants to know about total noise of airport and traffic together and impact of noise in gardens. 1 asked what noise contour maps are. 1 would like the dB information. 1 said can't comment without knowing scale of noise pollution. 1 said does the NMP take into account any variations in procedure that may arise between instrument and visual landings.	Y	The Noise Mitigation Plan (document reference TR020002/APP/2.4) consists of a series of proposals covering all the aspects of aircraft noise that RiverOak considers are sufficient to mitigate it adequately.
Noise- no concerns	74 in total said no noise concerns including; 1 said we have had bombers and Concorde before; 2 said residents who have chosen to purchase property close to an airport should expect to hear noise of aircraft. 18 said noise when airport previously open was ok. 3 said shouldn't move under flight path if don't like the noise. 4 said they like the sound of planes with one who specifically moved into flightpath only to find the airport had closed. 2 said noise lower than thought it would be. 1 said noise would be nothing in comparison to music from Dreamland. 2 said noise a small price to pay for the benefits the airport would bring. 2 said people would get used to the noise. 1 said noise only a concern to Thanet. 3 said road noise worse than planes. 1 said train noise is more annoying. 1 said won't be any louder than mopeds.	Y	RiverOak notes and welcomes this response.
Noise-type of aircraft	44 people said modern planes are quieter. 2 asks which type of planes will be used. 1 said Sure that RiverOak	Y	RiverOak notes this response.

	will do everything in light of modern technological advances.		
Noise-compensation	8 people responded re compensation. 2 said £4,000 insufficient amount for insulation. 1 said noise insulation scheme useless for residents living under flight path and can be no insulation for outside. 1 asked how the 42 schools under the flight path will be protected. 1 asked how the 400 listed buildings in Ramsgate would be protected. 1 said that their home is just outside the noise contour, does that mean that they are not eligible for compensation. 1 said that roof insulation won't help. 1 said report said planes flying low may damage roof tiles but that this would be hard to prove.	Y	RiverOak has offered insulation and residential relocation package which matches and exceeds Government guidance. This package has been refined in response to statutory consultation. The compensation to be made available to residents for insulation purposes exceeds that provided by larger, busier UK airports. Schools under the flightpath will be protected by a commitment to provide reasonable levels of noise insulation and ventilation to schools and community buildings within the 60dB LAeq (16 hour) day time contour. Mitigation measures are based on predicted noise contours for Year 20 of operation (the 'worst-case' year) and if a party falls outside of the relevant they will not be entitled to compensation, although individual claims will be considered on a case by case basis. A wake turbulence policy is included in the Noise Mitigation Plan (document reference TR020002/APP/2.4) and provides for each claim to be considered by an expert surveyor who will be able to identify the pattern of damage caused by such turbulence. This policy will operate in a similar way to those established at other UK airports.
Noise-mitigation	4 respondents said that the day time hours were too long. 23 respondents said they are satisfied with the mitigation proposed. 8 said that mitigation inadequate. 1 said there should be no change to 2014 operational permissions. 1 said noise made by shifting cargo around late evenings or early mornings should be considered. 1 said no map included. 1 said confident that RiverOak has addressed all issues relating to noise abatement. 1 said positive that it will be evened out during "trial and error" until it satisfies majority. 1 said keeping 70% of takeoffs and landings away from	Y	Each individual comment made has been considered and has resulted in RiverOak refining its commitments in both the ES (document reference TR020002/APP/5.2-1 – 5.2-26) and the Noise Mitigation Plan (document reference TR020002/APP/2.4) in response to these comments where it has been possible or necessary to do so. We are confident that our environmental impact assessment has taken all of these comments into account and that, where concerns about specific impacts have been raised, these have either been assessed or scoped out of the assessment.

	<p>Ramsgate essential. 1 said should be same noise levels as Heathrow. 1 said statements in relation to mitigation misleading. 1 said no measures will mitigate noise for those living nearby. 1 said impossible to noise-proof homes without need for re-decoration. 2 said will be noisy even with mitigation. 1 noted shoulder period could have noisy aircraft taking off/landing. 1 said air-conditioning should be designed so as not to increase ambient noise. A said noise is expected if you live by an airport but you get used to it and RO are doing their best to ensure noise is a bare minimum. 1 said very strong winds over landing path means noise would be huge and noise monitoring should be carried out by an independent body not the airport. 1 said glad noise mitigation being considered. 1 said Compensation may be available but hardly any residential properties or schools fall within the area. 1 said engine running test bays should be in correct areas and support locals with improvements i.e. double glazing. 1 said runway should be sea incoming and sea outgoing. 1 said Circuits and bumps' from training flights was also an issue before Manston was closed. 1 said take-off is the noisiest period.</p>		
<p>Noise; problem</p>	<p>15 said noise will be unacceptable. 1 asked if we can make jet engines quiet. 1 said cannot stop plane noise. 1 said constant noise over Herne bay unacceptable. 1 said noise levels will be unbearable for Ramsgate residents. 3 said they remember how noisy it was when the airport used to be open. 2 said your NTS concludes "significant effects are likely to be experienced as a result of noise and visual impact" 1 said amount of</p>	<p>Y</p>	<p>The Noise Mitigation Plan (document reference TR020002/APP/2.4) consists of a series of proposals covering all the aspects of aircraft noise that RiverOak considers are sufficient to mitigate it adequately.</p>

	cargo movements will change everything. 1 said noise average will have little bearing to reality.		
Penalties	4 said penalties would not be a deterrent. 1 said penalties are too low. 1 asked how effective penalties would be against overseas carriers. 1 said good idea to put money into community Proposed Developments. 1 said fines a good idea but will just be happy to have airport re-opened.	Y	The Noise Mitigation Plan (document reference TR020002/APP/2.4) consists of a series of proposals covering all the aspects of aircraft noise that RiverOak considers are sufficient to mitigate it adequately. The level of penalties has been considered at length with appropriate advice from industry experts. The level of penalty is considered to be a deterrent for both local carriers and those from overseas. In addition it is thought appropriate that those incurring the penalties should pay into a fund which benefits the communities that are affected by any transgression.
RiverOak	1 said RiverOak will say anything to get what they want. 1 said shareholders and directors of the companies involved in the reopening are non UK resident - worried about accountability should it go 'belly-up'. 1 said they should stick to their commitments.	Y	RiverOak are a reputable UK company that has been committed to reopening Manston Airport for a number of years.
Quota	1 respondent said they support the use of Quota Counts. 4 said QC too high (higher than Heathrow). 1 said quota of 4000 does not restrict number of flights in a 24 hour period. 2 said don't say how many flights there will be from the quotas. 1 said it would be useful to know what the real figure is expected to be. 1 said no quota on day time noise levels could mean aircraft movements every 10 mins. 2 noted different QC for passenger flights. 1 said that average QC means that few households under flight path would qualify for noise insulation. 1 asked what restrictions are in place to prevent 'catch up' of flights interrupted by bad weather.	Y	RiverOak is proposing a freight airport which needs more flexibility in terms of movement numbers than a passenger airport as the exact fleet mix and type of freight to be handled at the airport are not yet known. The noise based quota (Noise Mitigation Plan (document reference TR020002/APP/2.4)) is sufficient to mitigate the main impact of the airport. Movement limits are not sensitive to the size or noise certification of an aircraft and, as a result, they are not as successful in mitigating that noise impact.

	Quotas don't limit total number of aircraft. 1 said lack of consistency on QC throughout documents.		
Tourism	8 said it will have an adverse impact on tourism, particularly on Ramsgate's outdoor café culture.	Y	<p>The effects on tourism are discussed within Chapter 13: Socio-Economics of the ES (document reference TR020002/APP/5.2-2). Tourism receptors in the vicinity of the Proposed Development may experience effects resulting from the increased activity in the geographical area, in both construction and operational phases. For tourism businesses within the surrounding area, the increased visitor numbers associated with the airport operation, in conjunction with increased incomes from employees at Manston, will likely lead to increased demand for tourism facilities and associated spending in the locality. This could result in improvements to their volume of trade.</p> <p>In terms of indirect impacts, such as increased traffic, noise or dust, detailed assessments have been undertaken in Chapter 6: Air Quality, Chapter 12: Noise and Chapter 14: Traffic and Transport of the ES (document reference TR020002/APP/5.2-1 – 5.2-2). The negative effects on tourism are commonly observed to be related to noise and traffic.</p> <p>The effects of noise on tourist businesses will be minimal as the increase in urban areas will be small compared to existing sources. Aircraft noise will increase at the main beach in the centre of Ramsgate which is already subject to urban noise but there will be no noticeable noise increases at any other Kent beaches.</p> <p>Outside these areas the effects will depend on existing background levels but in general are considered sufficiently low not to affect the level of business activity or value. The site is well connected by road and rail and traffic increases are assessed to be minimal. The effects of traffic on tourism are considered to be low and will not affect the level of business activity or value.</p>

Traffic	1 said aircraft movements every 10 minutes could create additional road traffic on already congested roads. 1 said there will be clogged up roads. 1 said Proposals concerning approach road at Spitfire Way would be inadequate. Wonder if an entire overhaul of road networks in this part of Kent would be required to cope with the additional haulage servicing the cargo deliveries. Some of the local road network is already designated for emergency 'Operation Stack' relief of the M20/A20 route to Dover and the Channel Tunnel. 1 said increase in traffic in Broomfield will cause noise. 1 said traffic outside development has not been considered e.g. cargo noise on roads.	Y	<p>A Transport Assessment (document reference TR020002/APP/5.2-15) has been carried out and is reported on in Chapter 14 of the ES (document TR020002/APP/5.2-2). This assesses, amongst other things, operational junction capacity and puts forward suggestions for mitigating against impacts.</p> <p>As part of the Transport Assessment detailed junction models for 28 local junctions as well as all the access junctions to the site have been prepared to inform where junction mitigation proposals may be required.</p> <p>The junctions modelled include junctions in Broadstairs, Margate, Ramsgate and Manston, key A299 junctions and many others and include the key junctions along Spitfire Way.</p> <p>The DfT is seeking an alternative to Operation Stack urgently that will avoid Manston Airport.</p>
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Table 11.12: Summary of issues raised in Stage 3 community consultation in response to Question 5 of the Feedback Form and how RiverOak had regard to the responses

Question 5: Do you have any other comments about our proposals for reopening Manston Airport?

Topic	Issue raised	Change? Y / N	Regard had to response
General support	232 respondents were supportive of the Proposed Development but did not give specific reasons for this.	N	RiverOak notes and welcomes this response.

General opposition	149 respondents were opposed to the Proposed Development but did not give specific reasons for this.	N	RiverOak notes this comment but disagrees.
Accidents, disasters and security	26 respondents commented on the risk of aircraft accidents and the threats posed to those on the flight path. 11 respondents said that there was a need for a public safety zone to minimise risk.	Y	Chapter 17 of the ES (document reference TR020002/APP/5.2) reports on the assessment of potential likely effects of major accidents and disasters.
Aircraft	33 respondents commented on the size and age of aircraft that will use the airport. The majority of these comments specifically referred to the noise, polluting nature, and reliability of these aircraft. 12 of these respondents were concerned about the low flying nature of the aircraft.	N	The Noise Mitigation Plan (document reference TR020002/APP/2.4) includes a series of mitigation measures which will limit the noise impact on residents including the introduction of a night time noise based quota limit, the prohibition of the noisiest QC8 and QC16 flights at night time and the provision of insulation for properties affected by noise.
Alternative use of the site – housing	43 respondents were against using the site for housing. Comments touched on concerns that housing would only bring in temporary jobs, and that local infrastructure would not be able to cope with more housing. 98 respondents were supportive of using the site for housing. Comments centred around a need for more affordable housing in the local area and particularly that : <ul style="list-style-type: none"> - there is a strong demand for housing; - housing will have to be built elsewhere on farmland or on greenbelt sites 	N	RiverOak believes that the best use of the site is for the Proposed Development. As of January 2018, the Manston Airport site is no longer being promoted as a mixed use settlement for up to 2,500 new homes in the new draft Thanet Local Plan. Thanet District Council launched a 'Call For Sites' in February 2018 which invites anyone to submit details of a site that they consider suitable for development. This could include sites suitable for housing development which have not yet been considered by the Council that could absorb the 2,500 houses previously allocated at the airport. The Manston site is zoned for aviation use and reopening the airport will provide much needed employment opportunities in an area of relatively high deprivation.

	<p>- the housing plans have greater benefits and fewer adverse impacts</p> <p>4 respondents asked RiverOak to confirm the number of houses to be built as part of the Proposed Development (seeking confirmation on the figure of 2,500).</p> <p>1 respondent asked if there were any plans to build houses on the site in the future.</p>		
Alternative use – support for airport	<p>16 respondents supported the use as an airport.</p> <p>4 respondents supported the Proposed Development as they offer an alternative to and ease pressure on Heathrow, Stansted and Gatwick.</p> <p>10 respondents commented that an airport would be bring a lot to the local area, including cheaper flights and tourism.</p>	N	As per response above.
Alternative use of the site –Other developments	<p>10 respondents supported other proposed uses for the site. Examples of other uses included industrial use or a “super hospital”</p>		As per response above.
Application DCO/NSIP –	<p>13 respondents took issue with the application being an NSIP or whether it is eligible for a DCO.</p> <p>2 respondents queried why an application needed to be made when the site was for sale recently.</p> <p>30 respondents commented that the airport is a national asset and 3 of these respondents felt that</p>	Y	RiverOak’s NSIP justification document (document reference TR020002/APP/2.3) sets out RiverOak’s case for why the Proposed Development satisfies the test set out in s.23 of the Planning Act 2008 i.e. why the airport is considered an NSIP.

	the airport could be useful in emergency situations.		
Aviation policy - Need	<p>14 respondents commented on the need for the Proposed Development. Examples included:</p> <ul style="list-style-type: none"> - Competitor airports have capacity to expand if needed; - Heathrow is supposed to meet London and the South East's capacity needs for the next 30 years; - The opening of the airport will create more capacity for Heathrow and Gatwick - The location is less accessible and therefore more expensive for exporters to use than more centrally located airports. 	N	<p>The Azimuth Report (document reference TR020002/APP/7.4) provides a detailed case for the reopening of the airport. It is clear that the UK needs additional airport capacity. The evidence shows that air freight is particularly vulnerable to capacity constraints not only in the UK but also in Europe (see the Schiphol Airport example). Manston Airport zoned for aviation use, can provide some of the much-needed capacity almost immediately. RiverOak's planned investment in the airport would provide state-of-the-art facilities for freight, addressing many of the current difficulties experienced by freighter operators.</p> <p>The vast majority of freight passing through Heathrow is carried as belly freight (in the hold of passenger aircraft). For example, in 2016, 1,457,192 tonnes were carried as belly freight compared to 83,837 tonnes in dedicated freighters. In terms of air traffic movements, Heathrow handled 470,747 passenger air traffic movements (ATMs) and 2,452 cargo-only ATMs in 2016. The proposed addition of a third runway at Heathrow is unlikely to be operational until at least 2030. By this time, the likelihood is that Low Cost Carriers, who do not usually carry belly freight, will fill much of the third runway's capacity. Consequently, a new runway at Heathrow may not resolve the capacity issues for dedicated freighters.</p>
Business Case – criticisms	<p>15 respondents criticised the weakness of the business case.</p> <p>21 respondents criticised the suitability of the Proposed Development's location.</p>	N	RiverOak stands by its case – see comment above.

	<p>All of the respondents said that the location was unsuitable for an airport for various reasons, including:</p> <ul style="list-style-type: none"> - issues in transporting cargo by road to the rest of the UK; and - catchment area limited by coastline. <p>59 respondents supported the business case for the Proposed Development, with reasons including:</p> <ul style="list-style-type: none"> - that the airport is already there; - there is a need for more airport capacity; - new infrastructure will attract more carriers. <p>109 respondents commented that the business case for the Proposed Development was not viable.</p> <p>28 respondents commented that the attempts to previously open the airport have been unsuccessful.</p> <p>15 respondents commented on a fall in demand for cargo planes and that the cargo industry is shrinking.</p> <p>7 respondents commented that the Proposed Development would not be viable owing to its closeness in proximity to the town.</p> <p>5 respondents criticised the lack of economic justification for the plans, arguing that more would</p>		
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	<p>be lost to the environment, tourism and heritage than would be gained.</p> <p>4 respondents commented that there were existing problems at the site regarding infrastructure.</p> <p>1 respondent felt that the Proposed Development plans did not go far enough, and that the site is best suited for wider expansion as an all-purpose airport.</p> <p>The remaining respondents were generally unconvinced with the viability of the business case.</p>		
Business Case – motives/Promoter	<p>3 respondents commented that the Proposed Development was only motivated by financial gain.</p> <p>39 respondents raised concerns about the promoter of the Proposed Development. Concerns included:</p> <ul style="list-style-type: none"> - a lack of aviation experience; - an unclear source of funding; - unknown investors from Belize. 	N	RiverOak considers that there is no reason for there to be concern about their involvement. The Funding Statement (document reference TR020002/APP/3.2) sets out how the Proposed Development will be funded.
Community Impact	<p>21 respondents commented that the Proposed Development will impact the local community.</p> <p>13 respondents commented that there will be a negative impact on their community. 5 respondents commented on the positive impacts on the community, including:</p> <ul style="list-style-type: none"> - the prospect of new business locating to the area; 	N	Chapter 13 of the ES (document reference TR020002/APP/5.2-2) sets out RiverOak's assessment of the potential socio-economic effects of the Proposed Development. This Chapter also sets out the potential benefits of the Proposed Development.

	<ul style="list-style-type: none"> - less traffic towards Heathrow and Gatwick; - a benefit to future generations 		
Community Impact - Children	<p>40 respondents commented on the impact on children. Of these, 38 respondents felt that the impacts on children would be negative, with concerns including:</p> <ul style="list-style-type: none"> - the impact of noise on learning abilities; - issues with the development of young children and sleeping; <p>1 respondent proposed a partnership with local schools to “enhance engineering skills” and 1 other respondent commented that the Proposed Development will improve the aspirations of children.</p>	N	<p>The Health Impact Assessment (Appendix 15.1) and Chapter 15: Health and Wellbeing of the ES (document reference TR020002/APP/5.2-13 and 5.2-2, respectively) have assessed potential effects on physical and mental health and wellbeing, including cardiovascular and respiratory diseases and mortality, depression or anxiety, and qualitatively reported mental wellbeing. Some adverse impacts due to noise and air pollutant emissions are predicted, and measures to mitigate these are set out in Appendix 15.1 and Chapter 15. Beneficial effects due to employment generation, supply chain spending and connectivity are predicted, and measures to enhance these are also set out in these documents</p> <p>With regard to children’s learning, the Noise Mitigation Plan (document reference TR020002/APP/2.4) specifies that reasonable levels of noise insulation and ventilation for schools within the 60 dB L_{Aeq} (16 hour) day time contour will be provided.</p>
Community Impact – General disruption	<p>27 respondents criticised the Proposed Development for the amount of disruption that will be caused to the local community, including to retirement homes.</p>	N	<p>RiverOak notes this comment but believes that the Proposed Development will bring more benefits than effects. Further details can be found in Chapter 13 of the ES (document reference TR020002/APP/5.2-2).</p>
Community Impact – Property	<p>48 respondents commented on the effects of the Proposed Development on their properties. The majority of the concerns included:</p> <ul style="list-style-type: none"> - a reduction in property prices; and - damage to both the residential and commercial property markets; 	N	<p>RiverOak will abide by the national compensation code in relation to property compensation.</p>

	1 respondent was concerned about blight.		
Compensation	<p>39 respondents raised concerns about the compensation measures.</p> <p>20 respondents criticised the adequacy of the compensation scheme, stating that it would only be available to a limited group of residents near the airport, would not cover those in directly under the flight path, and would not extend to matters such as the health of residents, of that the compensation measures were inadequate as the effects of noise could not be mitigated in their properties. 1 respondent described their property as a listed building within a conservation area meaning that soundproofing (double-glazing) would not be available.</p> <p>3 respondents criticised the level of compensation available, including that the cost of double-glazing may be more than £4,000.</p> <p>13 respondents were unaware what compensation was available and who would be eligible;</p>	N	As part of Stage 3 Consultation, RiverOak prepared and consulted on a draft Noise Mitigation Plan which included a proposed compensation scheme. Following consultation this has now been modified and forms part of the application submission as the Noise Mitigation Plan (document reference TR020002/APP/2.4). The Noise Mitigation Plan sets out the mitigation measures that would be adopted and this includes insulation and financial compensation in certain scenarios.
Consultation and Engagement	<p><u>General</u></p> <p>625 respondents commented on the consultation. Of this 105 commented on the adequacy of the consultation. Almost all of the 105 respondents criticised the both the consultation and the information made available for being inadequate.</p> <p><u>Documentation</u></p>	N	As set out in this Report, RiverOak believes its three stage consultation was robust and had an appropriate reach.

	<p>115 respondents commented on the documents made available as part of the consultation. Approximately 60 respondents criticised the complexity and volume of the documents.</p> <p>5 respondents criticised the accessibility of the documents and were unaware that copies were available online at Herne Bay Library or that copies could be taken away.</p> <p>6 respondents criticised the documentation for being unrealistic, inconsistent or misleading.</p> <p>4 respondents praised the quality of the documentation made available.</p> <p><u>Events</u></p> <p>103 respondents commented on the events held as part of the consultation for the Proposed Development.</p> <p>34 of these respondents criticised the number of events, the venues, and the scheduling</p> <p>41 respondents were unhappy with the quality the events, a number of these respondents:</p> <ul style="list-style-type: none"> - criticised the atmosphere as aggressive or intimidating; - criticised the staffing levels and the ability of staff to respond to their queries; - felt that the presentations did not cover enough key issues; - felt that their concerns were not addressed 		
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	<p><u>Notification</u></p> <p>160 respondents commented on being notified prior to the consultation taking place.</p> <p>105 of these respondents stated that they did not receive any notice of the consultation even though the Proposed Development affected them. Many of these respondents complained about:</p> <ul style="list-style-type: none"> - the lack of publicity around the consultation; - only finding out about the Proposed Development through newspaper advertisements, social media or by chance (rather than being informed directly); - reports that numerous people under the flight path had not being consulted at all; - a lack of leaflet canvassing in Ramsgate. <p>21 respondents acknowledged that they received notification of the consultation but criticised the amount of time they then had to prepare. A number of these respondents complained that they were only notified on the day of consultation events.</p> <p>26 respondents complained about a general lack of awareness surrounding the consultation.</p> <p>1 respondent specifically queried whether all persons affected by the Proposed Development would be notified of the consultation and 1 other respondent felt that St Nicholas at Wade Parish Council should have been consulted.</p>		
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Economic benefits	<p>42 respondents commented on the positive economic benefits of the Proposed Development. Examples of the benefits cited by respondent's include:</p> <ul style="list-style-type: none"> - potential to increase investment and employment opportunities in the area; - good for the economy; - use of local airport will benefit local business 	N	RiverOak agrees that the Proposed Development will bring economic benefits.
Economic negatives	<p>57 respondents commented on the negative economic effects of the Proposed Development. Examples cited by respondent's include:</p> <ul style="list-style-type: none"> - expensive and time consuming; - overstated job numbers; - local businesses will lose out 	N	RiverOak believes that any potential likely effects of the Proposed Development will be outweighed by the benefits. Further details can be found in Chapter 13 of the ES (document reference TR020002/APP/5.2-1).
Employment negative opinion –	<p>101 respondents felt that there would be negative impacts on employment. The majority of concerns centred around:</p> <ul style="list-style-type: none"> - the number of jobs has been discredited by independent organisations; - freight airports require little manpower; - local jobs will be lost due to a drop in tourism; - a lack of new skilled jobs; 	N	The Azimuth Report (document reference TR020002/APP/7.4) shows the forecasts for employment that Manston Airport is likely to generate. These jobs are predicted to be direct (including those created by the airport operator, airlines, general aviation, handling, immigration and customs, retail and food concessions and aircraft maintenance), indirect (including a wide range of jobs in the airport's supply chain), induced (which includes jobs created by the spending of people employed directly and indirectly), and catalytic (which includes jobs in the wider economy supported by the operations of an

	<ul style="list-style-type: none"> - national jobs rather than local jobs. 		airport such as in tourism and trade). Job creation to Year 20 of operation is forecast to total more than 23,000 across all categories.
Employment positive opinion –	<p>124 respondents felt that the Proposed Development would bring about positive changes for employment. Examples of the benefits to employment included:</p> <ul style="list-style-type: none"> - higher skill jobs for younger people to go into; - potential for private jets and business travellers; - potential for apprenticeships with in-house training 	N	RiverOak agrees that the Proposed Development would bring employment benefits. Please also see response above.
Environmental Impact Assessment	<p>44 respondents commented on the adequacy of the impact assessments. In particular, respondents said that:</p> <ul style="list-style-type: none"> - incomplete EIA means that there is a lack of protection for local residents; - environmental impact studies are inadequate; - lack of clarity on the true impact of the airport; - concerns about the pollution assessment - the scoping opinion has not been updated or needs to be revisited; - under the EIA regs, only the significant effects will be assessed, but it is unclear what the definition of significant is. 	Y	The PEIR was acknowledged to be incomplete as it is the assessments that have been undertaken at the time of publication, however RiverOak believes that the potential likely effect of the Proposed Development was adequately and appropriately reported on in both the 2017 and 2018 PEIRs. Since the 2018 consultation, further work has been undertaken on the effects of the Proposed Development and the ES (document reference TR020002/APP/5.2) reports on this additional work.

Environment – air quality	170 respondents were concerned about the increase in pollution negatively affecting air quality. Examples of concerns included: <ul style="list-style-type: none"> - pollution will be detrimental to health; - increase in road traffic and diesel fumes; - catastrophic effects of air quality on biodiversity - air pollution can affect people, animals and plants, and can deteriorate buildings/materials 	N	The air quality effects resulting from the Proposed Development have been assessed in Chapter 6: Air Quality of the ES (document reference TR020002/APP/5.2-1). The assessment shows that air quality will remain comfortably within legal limits. These legal limits are themselves based on World Health Organization guidance on health effects, allowing for the most vulnerable members of society. The air quality impacts of the airport are small and confined to the vicinity of the airfield and certain major roads. The impact of air quality on wildlife, ecosystems and biodiversity is assessed in Chapter 7: Biodiversity of the ES (document reference TR020002/APP/5.2-1).
Environment – climate change	7 respondents felt that the Proposed Development would be detrimental to efforts against climate change. 1 respondent suggested the use of green energy to power the airport.	Y	Chapter 16 of the ES (document reference TR020002/APP/5.2-2) sets out the climate change assessment that has been undertaken.
Environment – contamination	12 respondent had concerns relating to contamination of the site, with references made to Thor and Sericol environmental contamination.		It has not been possible to carry out an intrusive investigation due to restrictions on access imposed by the current owners however a full suite of measures for the protection of site users and construction workers has been included in Chapter 10 of the ES and the CEMP (document reference TR020002/APP/5.2-1 and 5.2-6). A ground investigation will be undertaken in consultation with the Environment Agency prior to the commencement of construction works.
Environment – Landscape	9 respondents criticised the impact the Proposed Development would have on peaceful nature of the environment and local conservation areas. 1 of these respondents stated that detailed proposals are needed in relation to biodiversity.		Potential impacts of designated nature conservation sites and other biodiversity interests are addressed in Chapter 7 of the ES (document reference TR020002/APP/5.2-1) as well as in the Report to Inform the Appropriate Assessment at Appendix 7.1 of the ES (document reference TR020002/APP/5.2-6). Potential Landscape Impacts are addressed at Chapter 11 of the ES (document

			TR020002/APP/5.2-2) with no significant impacts expected as a result of the Proposed Development.
Environment – Light	5 respondents commented that the Proposed Development would lead to an increase in light pollution.	N	An outline lighting scheme has been prepared for the Proposed Development and this is summarised in Chapter 3 of the Environmental Statement (document reference TR020002/APP/5.2-1). This information has allowed an understanding of the likely lighting effects to be included within Landscape and Visual Assessment set out in Chapter 11 of the ES and as the detailed design process moves forward additional information will be provided and the information contained here will be confirmed through more detailed modelling of the lighting conditions at specific receptors. The airport lighting has been designed to achieve compliance with the International Commission on Illumination (CIE) Guide: CIE 150:2003 Guide on the Limitation of the Effects of Obtrusive Light from Outdoor Lighting Installations for Environmental Zone E2:Rural Low district brightness - Village or relatively dark outer suburban locations. Based on those principles and with particular note to the boundary lighting condition of 1 Lux (maximum), it is not expected that there would be any significant effects as a result of the Proposed Development.
Environment Noise	- 323 respondents commented on the noise impacts of the Proposed Development. There was general dissatisfaction from the respondents on the level of noise.	Y	The potential noise effects resulting from the Proposed Development have been assessed in Chapter 12: Noise of the ES (document reference TR020002/APP/5.2-1). A summary of the significant residual effects is provided at Section 12.10. Based on this assessment, RiverOak has developed a Noise Mitigation Plan to reduce noise effects (document reference TR020002/APP/2.4). The impact of noise on wildlife, ecosystems and biodiversity is assessed in Chapter 7: Biodiversity of the ES (document reference TR020002/APP/5.2-1).

Environment Noise mitigation	– 11 respondents felt that the noise mitigation plans were inadequate.	Y	RiverOak has developed a Noise Mitigation Plan to reduce noise effects (document reference TR020002/APP/2.4). This plan was consulted upon in the 2018 statutory consultation and as a result of feedback received has been modified by cutting the Quota Count by nearly 50%.
Environment General opposition	– 41 respondents were opposed to the Proposed Development on general environmental grounds. A number of the concerns related to: <ul style="list-style-type: none"> - detriment to the local environment; - environmental impact should take precedence over perceived financial gain; - insufficient preliminary environmental information 	Y	The PEIR was acknowledged to be incomplete as it is the assessments that have been undertaken at the time of publication, however RiverOak believes that the potential likely effect of the Proposed Development was adequately and appropriately reported on in both the 2017 and 2018 PEIRs. Since the 2018 consultation, further work has been undertaken on the effects of the Proposed Development and the ES (document reference TR020002/APP/5.2) reports on this additional work.
Environment General support	– 4 respondents were generally supportive of the environmental impact of the Proposed Development. 1 respondent stated that the impact of housing on the site would be much greater and put more pressure on infrastructure.	N	RiverOak notes and welcomes this support.
Environment Water	– 10 respondents stated that they were concerned that water pollution would occur.	N	RiverOak is being very careful to protect the aquifer that runs roughly beneath the runway, particularly with respect to the redesign of the existing fuel farm nearby. We are in discussion with the EA on the issue of water contamination and will seek their agreement of our final mitigation measures. The Hydrogeological Impact Assessment, Appendix 8.1 of Chapter 8 Freshwater Environment of the ES (document reference TR020002/APP/5.2-7) includes an assessment of the risk to the groundwater environment from activities and sets out appropriate mitigation measures that are included in the CEMP (Appendix 3.2 of

			<p>the ES (document reference TR020002/APP/5.2-6) and to be implemented in the construction phase and incorporated into the site's design.</p> <p>Proposed mitigation is discussed in detail in the mitigation section of Chapter 8 Freshwater Environment in the ES (document reference TR020002/APP/5.2-1).</p>
Environment Wildlife	<p>– 33 respondents felt that there could be negative impacts on ecology or local wildlife. Examples of concerns included:</p> <ul style="list-style-type: none"> - an adverse impact on wildlife; - an impact on migrating birds; - the need for a full survey for protected species, including the brown hare; <p>1 respondent commented that areas of nature conservation would change with flight paths over the sea.</p>		<p>Potential impacts on biodiversity and wildlife interests are addressed at Chapter 7 of the ES (document reference TR020002/APP/5.2-1). Initial site surveys were undertaken in 2017 and these will be supplemented with additional survey work as detailed in ES Chapter 7 prior to the commencement of construction works. Flight paths over the sea and most notably Pegwell Bay are addressed primarily in the Report to Inform the Appropriate Assessment at Appendix 7.1 (document reference TR020002/APP/5.2-6).</p>
Flight paths	<p>30 respondents raised their concerns about the flight path.</p>	N	<p>RiverOak has assessed flight 'swathes' and local residents can be reassured that the flights will be kept to those swathes. Should the applied for DCO be granted RiverOak will develop and submit an airspace change proposal (ACP) to the CAA. Under the ACP, the CAA will expect the airport to develop proposals which seek to quantify and minimise environmental impact. The process includes a further round of environmental impact assessments and public consultation on the specific flightpaths being proposed. Proposed flightpaths will have to be within the proposed swathes; if RiverOak wishes to propose flightpaths which are beyond these then we will have to apply to amend the DCO to match them.</p>

			Low flying will be limited but unavoidable in the final phases of landing and the initial phases of departure near the airport.
Flight – Fuel	6 respondents commented on how the airport will receive fuel for cargo planes and one respondent does not understand why the Jentex site is being used.		<p>The access to the Fuel Farm (Jentex site) will be directly from the A299 and no HGVs will be permitted to routes through the village of Cliffsend as set out in the Airport Surface Access Strategy, Appendix O to the Transport Assessment (document reference TR020002/APP/5.2-25). This is the access arrangement previously used when the site was operational.</p> <p>A Technical Note outlining the Fuel Farm requirements and a high-level appraisal of the options as part of the fuel farm site selection has been completed. This can be found at Appendix 2.1 to the ES (document reference TR020002/APP/5.2-6).</p>
Flight – Numbers and Night Flights	<p>9 respondents were concerned with the number of flights scheduled.</p> <p>460 respondents commented on night flights. 337 of these respondents objected to night flights, reasons for objecting included:</p> <ul style="list-style-type: none"> - damage to health; - night flights are being concealed; - effects on children - will diminish attractiveness of the town to live in or visit - a lack of mitigation <p>60 respondents criticised the inconsistent information on night flights and queried why detailed information was not available. Respondents felt that they had been told night flights were only a worst case scenario or not</p>	Y	<p>RiverOak understands that noise is a worry for some respondents and is therefore proposing a night time policy which imposes movement limits combined with measures to reduce noise. Further information can be found in Chapter 12 of the ES (document reference TR020002/APP/5.2-2) and in the Noise Mitigation Plan (document reference TR020002/APP/2.4).</p> <p>This Noise Mitigation Plan was consulted upon during the 2018 statutory consultation and has been amended, including an almost 50% reduction in the Quota Count, as a result of feedback received to incorporate further mitigation measures to reduce the effects of noise.</p>

	<p>needed, but the quota now being claimed is very large.</p> <p>42 respondents specifically criticised the Quota Count and made the following observations:</p> <ul style="list-style-type: none"> - unclear who decides the quota; - the number of night flights will be intolerable; - year 20 forecast exposes over 10,000 homes to over 80dB noise; - there will be more night flights than at Heathrow <p>1 respondent supported night flights.</p>		
Flight – Passengers	<p>27 commented that they were in support of passenger services as part of the Proposed development</p>	N	<p>RiverOak is continuing with its plan to create a freight-focused airport. Passenger flights form a smaller part of the plan for the airport and are likely to be limited to four Code C aircraft belonging to a low cost carrier flying three or four rotations a day, plus a service to Schiphol Airport at Amsterdam and some seasonal charter traffic.</p>
Health Impacts - General	<p>138 respondents commented on the health impacts of the Proposed Development. Examples of concerns included:</p> <ul style="list-style-type: none"> - any gain in jobs would be offset by the ill-health of residents; - impacts on mental health - Thanet has the worst health outcomes in Kent and the Proposed Development will make matters worse; - effects on asthma sufferers/those with respiratory diseases; 	N	<p>The Health Impact Assessment, Appendix 15.1 of the ES (document reference TR020002/APP/5.2-13) assesses the potential health impacts associated with changes in noise and air pollution. Where adverse effects are predicted, measures to mitigate these are set out in that Chapter.</p>

	<ul style="list-style-type: none"> - pollution could shorten life expectancy. <p>34 respondents criticised the lack of appropriate health impact assessment.</p>		
Health Impacts - Sleep	<p>159 respondents commented on the health impacts of the Proposed Development on sleep. Examples of concerns included:</p> <ul style="list-style-type: none"> - night flights affect sleeping patterns; - the sleep of tens of thousands of people will be affected; - risk of sleep deprivation; - link between impact on sleep and an increase in road traffic accidents; - problems sleeping for those who do shift work. 		<p>Impacts on human health are addressed in Chapter 15 of the ES (document reference TR020002/APP/5.2-2) with further information available at Appendix 15.1: Health Impact Assessment (document reference TR020002/APP/5.2-13). This work builds on the noise modelling reported in Chapter 12 of the ES (document reference TR020002/APP/5.2-2).</p>
Heritage	<p>43 respondents felt that the Proposed Development would have an impact on local heritage; an additional 20 commented that this would be a negative impact.</p> <p>11 respondents supported the return of the airport as a symbol of the local area's history, 1 respondent suggested an exhibition at the Town Centre Gallery marking the history of the Airport.</p> <p>2 respondents suggested that visiting Heritage aircraft have access to the museums on their new locations on the Northern Grass. 1 respondent suggested that a percentage of fines should be pledged to the museum and another queried who would be funding the museums.</p>	N	<p>Impacts on heritage assets have been assessed and are reported in Chapter 9: Historic Environment of the ES (document reference TR020002/APP/5.2-1). The assessment process has been undertaken in line with relevant policies and legislative requirements (see Chapter 9: Historic Environment, Section 9.2) and appropriate mitigation measures are proposed in Sections 9.8-9.10 of Chapter 9: Historic Environment. The assessment includes consideration of indirect effects on off-site designated heritage assets with the potential to be affected, including listed buildings in Ramsgate (Chapter 9: Historic Environment, Section 9.10 and Appendix 9.1 (document reference TR020002/APP/5.2-8 and 5.2-9)).</p>

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Immigration	2 respondents felt that the Proposed Development could help reduce illegal immigration as there will be fewer lorries.	N	RiverOak notes this response but notes that this is not a matter for it to take a view on.
Local politics	28 respondents commented on the impact of local politics. General concerns were that: <ul style="list-style-type: none"> - the consultation has been politicised; - contradictory information from MPs; - a failure by the local council to address the concerns of residents 	N	RiverOak notes this response but notes that this is not a matter for it to take a view on.
Masterplan suggestions	– 15 respondents commented on the proposals for the site and suggested improvements/new facilities. Suggestions included: <ul style="list-style-type: none"> - a swimming pool be built as part of the plans; - the return of the Manston air show; - modify the terminal to handle 300-400 passengers per hour; - Extend fuel piping to passenger stands - Two flying schools in order to encourage competition - relocate all cargo to an expanded Echo Apron; and - develop in a less environmentally sensitive location, but with the same proposals. 		RiverOak welcomes the suggestions for site enhancements and whilst it cannot, at this time, confirm that these will be incorporated, it can confirm that they will be considered. However, a swimming pool on site is not compatible with an airport.

	1 respondent criticised the Proposed Development as more land would be needed than is currently available.		
Surface Access	<p>141 respondents commented on the access to the Proposed Development. Respondents felt that:</p> <ul style="list-style-type: none"> - there would be an increase in congestion; - there is a need for a high speed rail link in order to make the proposals a success - the local roads cannot cope with high levels of HGV traffic; - the road network is unsuitable according to the Road Haulage Association 	Y	A Transport Assessment (document reference TR020002/APP/5.2-15) has been carried out and is reported on in Chapter 15 of the ES (document reference TR020002/APP/5.2-2). This sets out the impact the Proposed Development could have on the local road network and what mitigation measures are proposed to deal with this.
Tourism	<p>190 respondents commented on the Proposed Development's impacts on tourism. Respondents were critical of:</p> <ul style="list-style-type: none"> - the damage that will be done to arts, culture and local tourism; - the studies into the effects on tourism and the leisure industry seem inadequate; - the effects off low flying aircraft on tourism; - impact to Herne Bay which is a tourist destination; - loss of tourism related jobs; <p>1 respondent felt that the proposals would be an improvement for tourism and another respondent encouraged the selling of the airport concept to tourists, for example through air shows.</p>	N	<p>The effects on tourism are discussed within Chapter 13: Socio-Economics of the ES (document reference TR020002/APP/5.2-2). Tourism receptors in the vicinity of the Proposed Development may experience effects resulting from the increased activity in the geographical area, in both construction and operational phases. For tourism businesses within the surrounding area, the increased visitor numbers associated with the airport operation, in conjunction with increased incomes from employees at Manston, will likely lead to increased demand for tourism facilities and associated spending in the locality. This could result in improvements to their volume of trade.</p> <p>In terms of indirect impacts, such as increased traffic, noise or dust, detailed assessments have been undertaken in Chapter 6: Air Quality, Chapter 12: Noise and Chapter 14: Traffic and Transport of the ES (document reference TR020002/APP/5.2-1 – 5.2-2). The negative effects on tourism are commonly observed to be related to noise and traffic.</p>

	<p>4 respondents felt that Thanet could not only rely on a café culture and seaside resort basis alone.</p>		<p>The effects of noise on tourist businesses will be minimal as the increase in urban areas will be small compared to existing sources. Aircraft noise will increase at the main beach in the centre of Ramsgate which is already subject to urban noise but there will be no noticeable noise increases at any other Kent beaches.</p> <p>Outside these areas the effects will depend on existing background levels but in general are considered sufficiently low not to affect the level of business activity or value. The site is well connected by road and rail and traffic increases are assessed to be minimal. The effects of traffic on tourism are considered to be low and will not affect the level of business activity or value.</p>
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Summary of Influence on the Proposed Development

11.48 By far the issue with the most responses was aircraft noise, particularly at night. In response to this RiverOak has cut the originally proposed Quota Count of 6000 to 3028 for flights between 2300 and 0700 and has made other changes to the Noise Mitigation Plan: the draft Noise Mitigation Plan which formed part of the Stage 3 Consultation can be found at **Appendix 41** and the application version of the Noise Mitigation Plan is document **TR020002/APP/2.4**. Other issues raised were air quality, the museums and the economic benefits of the project, and the responses have been used in finalising the Environmental Statement (**document reference TR020002/APP/5.2**) and the Azimuth Report (**document reference TR020002/APP/7.4**).

12 STAGE 3: STATUTORY CONSULTATION: PUBLICITY (SECTION 48)

Section 48 Notice

12.1 A second notice advertising RiverOak's intention to apply for a DCO in respect of the Proposed Development was published in accordance with Section 48 of the PA2008 and Regulation 4 of the Application Regulations. This was a combined s.47/s.48 notice. A copy of this second Notice can be found at **Appendix 33**. The newspapers in which the Section 48 notice was published and the dates of publication are set out in **Table 12.1** below. Copies of the published versions of the notice can be found at **Appendix 47**.

12.2

Table 12.1 Section 48 notice: newspaper and dates of publication

Newspaper	Date
East Kent Mercury Series: Deal, Sandwich, Dover Mercury	3 and 10 January 2018 (NB. The Deal Edition has an error on its front page stating 4 January but the correct dated of 3 January is on the page of the Notice.)
Kentish Gazette Series: Canterbury & District, Herne Bay Gazette, Whitstable Gazette, Faversham News	4 and 11 January 2018
Isle of Thanet Gazette	5 and 12 January 2018
The Times	4 January 2018
London Gazette	4 January 2018 (online); 5 January 2018 (hard copy)

12.3 In addition to this, a Consultation Advert was also placed as follows:

Table 12.2 Consultation Advertisement: newspaper and dates of publication

Newspaper	Date	Coverage
Kentish Gazette Series	Wednesday 10 January and Wednesday 17 January 2018	Whitstable, Faversham, Herne Bay, Canterbury
Herald Express Series	Thursday 11 January and Thursday 18 January 2018	Dover, Folkestone, Hythe, Ashford
Thanet Gazette	Friday 12 January and Friday 19 January 2018	Thanet

12.4 As stated in the Section 48 notice, the deadline to respond was 16 February 2018. A copy of the notice, as placed in each of the newspapers referred to in **Table 12.1**, is provided at **Appendix 47**.

- 12.5 In accordance with Regulation 13 of the EIA Regulations 2017, RiverOak sent a copy of the Section 48 notice to the prescribed consultation bodies (as defined under the EIA Regulations) on 12 January 2018. A copy of the covering letter can be found at **Appendix 32**. Further information about EIA consultation can be found in **Chapter 14** of this Report.

Additional Publicity

Online

- 12.6 Information about the Proposed Development and the consultation was available on the RiverOak website at www.rsp.co.uk and updates were sent using Twitter (@RSPManston) and Facebook (www.facebook.com/RSPManston). Further details of these activities can be found in the Media Report for the Stage 3 Consultation which is included at **Appendix 52**.

Press

- 12.7 Press releases were issued to the local press at the start of the consultation and later in the process to encourage participation. Further details of the press releases and press coverage, as well as copies of the newspaper adverts as they appeared in local papers can be found in the Media Report at **Appendix 52**.

Relevant responses

- 12.8 As community consultation under Section 47 was ongoing when the Section 48 notices were published, responses to both were received within the same deadline. Accordingly, details of relevant responses received from members of the public in response to the publication of the Section 48 notice are addressed in Chapter 8 which deals with community consultation.

13 EIA CONSULTATION

Introduction

- 13.1 This section provides an overview of the consultation and engagement relating to the EIA process, including screening, scoping and the 2018 PEIR. RiverOak's consultation and engagement on the EIA process is set out in more detail in the ES.

Screening Opinion and Consultation

- 13.2 On the 16 February 2016 RiverOak Investment Corporation notified PINS in writing that it would provide an ES in respect of the Proposed Development. A copy of the letter sent to PINS is provided at **Appendix 55**.

Scoping Consultation

- 13.3 Scoping is the non-mandatory process of seeking an opinion as to the appropriate content and extent of matters to be covered by the EIA. The scope of the EIA was determined through voluntary early and on-going engagement with consultees and more formally through the publication of an EIA Scoping Report (**Appendix 1.1 of the ES, document reference TR020002/APP/5.2-5**) on 30 June 2016 and request for a scoping opinion.

Feedback on the Scoping Report

- 13.4 The Scoping Opinion (**Appendix 1.2 of the ES, document reference TR020002/APP/5.2-5**) from PINS was received on the 10 August 2016. RiverOak has undertaken a review of the views expressed by the Secretary of State and representations from statutory consultees included in the Scoping Opinion. A full explanation of how the Scoping Opinion and the consultation undertaken by PINS in relation to it, has been provided in the technical Chapters of the ES (**document reference TR020002/APP/5.2-1 – 5.2-3**).

2009 and 2017 Regulations

- 13.5 The 2009 EIA Regulations were replaced by the 2017 Regulations in May 2017. RiverOak conducted its Stage 2 statutory consultation following the 2009 Regulations as the documentation had largely been drafted by that point. For the Stage 3 statutory consultation, it followed the 2017 Regulations because they were by then in force, and RiverOak wished to adhere to the most recent up-to-date requirements. The Environmental Statement has therefore been produced according to the 2017 Regulations.

PEIR Consultation

- 13.6 Regulation 10 of the EIA Regulations 2017 requires that where a development is EIA development the applicant confirms in their SoCC how they intend to publicise and consult on the PEI. The 2018 PEIR produced satisfied this requirements and was consulted on in accordance with the SoCC.
- 13.7 The 2018 PEIR formed part of a suite of documents which were available to view as part of the statutory consultation. The 2018 PEIR built on the Scoping Report, taking account of representations at Scoping stage, and provided high level information on the potential effects of the Proposed Development. As outlined in Chapter 8 of this Report, RiverOak produced a

SoCC in accordance with section 47 of the PA2008 detailing how it intended to consult upon the PEI.

- 13.8 The process of holding meetings with stakeholders to discuss key environmental issues was maintained by RiverOak before, during and after the statutory consultation. This enabled further influence of the EIA process through to production of the ES. Details of all such meetings and liaison has been provided in the technical Chapters of the ES **(document reference TR020002/APP/5.2-1 – 5.2-3)**.

14 CONSIDERATION OF FURTHER CONSULTATION

- 14.1 Following RiverOak's withdrawal of the application submitted to PINS on 9 April 2018, RiverOak considered whether further statutory or non-statutory consultation would be appropriate.
- 14.2 It was decided that given that there were no changes being made to the Proposed Development design and there were no changes to the environmental impact assessment effects other than more certain mitigation proposals, this was not considered necessary.

15 CONCLUSIONS

- 15.1 RiverOak has adopted a multi-phased approach to its consultation, including both non-statutory and statutory stages. Statutory consultation has been undertaken in accordance with the relevant published SoCC and all relevant statutory requirements.
- 15.2 The responses to both statutory and non-statutory pre-application consultation stages have been taken into account and influenced the Proposed Development. So far as possible, feedback has resulted in changes being made to the Proposed Development but where this has not been possible, an explanation as to why this is has been provided in this Report.

Summary of Proposed Development changes

- 15.3 The main changes that have been made to the Proposed Development, in response to the feedback received during consultation include:
- 15.4 The main changes to the Proposed Development in response to feedback received during consultation include:
- 15.4.1 amendments to the masterplan for the airport;
 - 15.4.2 further and more detailed assessments undertaken as part of environmental impact assessment;
 - 15.4.3 additional application documents provided, such as an NSIP Justification and a CAA Interface Document; and
 - 15.4.4 a Noise Mitigation Plan drawn up, consulted upon and then amended, cutting the night-time Quota Count by nearly 50%.

Concluding remarks

- 15.5 This document demonstrates that thorough pre-application consultation was undertaken over three stages, one non-statutory and two statutory, and that regard was had to all the responses that were received in the preparation of the application, in full compliance with the requirements of the Planning Act 2008 and associated secondary legislation, guidance and advice.

