



RiverOak Strategic Partners

7.2 Planning Statement

TR020002/APP/7.2

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

Date:

July 2018

Planning Statement

In respect of

A Development Consent Order
application to reopen Manston
Airport, Kent

On behalf of

RiverOak Strategic Partners
Limited

RPS Ref: AS/JCG21463

PINS Document Reference Number:
TR020002/APP/7.2

July 2018

Secure & Stable
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Date:	16 July 2018
RPS Project Number/Document Reference:	AS/JCG21463
PINS Document Reference Number	TR020002/APP/7.2

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1 INTRODUCTION

- 1.1 RiverOak Strategic Partners Limited ('RiverOak') proposes to reopen Manston Airport as an air freight hub with associated business aviation and passenger services, creating in excess of 23,000 jobs within East Kent and the wider economy by the airport's 20th year of operation (expected to be in 2039).
- 1.2 This Planning Statement has been prepared to accompany an application by RiverOak for a Development Consent Order (DCO). Its purpose is to consider the extent to which the proposals for development comply with the requirements of relevant planning policy.
- 1.3 The proposals to reopen Manston Airport ("the Proposed Development") are classified as a Nationally Significant Infrastructure Project (NSIP) by the Planning Act 2008 ("the Act") because they constitute a capacity increase of more than 10,000 air transport movements of cargo aircraft each year.
- 1.4 This NSIP will help to provide much needed additional air freight and cargo handling capacity in the south-east of England in accordance with the Government's stated aim to maintain the UK's status as a global hub for aviation and making the most use of existing runways.
- 1.5 As the Proposed Development is an NSIP, it therefore requires the grant of development consent by the making of a DCO. An application for development consent must be submitted to the Planning Inspectorate (PINS) and, where that development is 'Environmental Impact Assessment (EIA) Development,' that application must be supported by an Environmental Statement (ES) reporting on the findings of the EIA process. An ES is provided with this DCO application.
- 1.6 RiverOak is a UK-registered company which has acquired all rights and interests and assumed financial and operational responsibility for the DCO in respect of Manston Airport and the anticipated reopening and operation of the airport. RiverOak is fully resourced and funded to accommodate all costs arising from the DCO application to acquire and reopen Manston as a fully operational airport. The DCO includes compulsory acquisition powers as RiverOak do not currently own the airport site. Currently, the site is mostly owned by Stone Hill Park Limited who have their own aspirations to redevelop the Manston Airport site for a new settlement which RiverOak believes is not needed; nor can it be implemented/delivered; nor is it viable.
- 1.7 The Proposed Development responds specifically to established demands for additional cargo capacity within the South East of England and envisages re-establishing passenger services. The Proposed Development complies entirely with the Government Framework for UK Aviation as set out in the Aviation Policy Framework (APF) (2013); the Airports National Policy Statement (NPS) (June 2018) and the emerging new Aviation Strategy "*Beyond the Horizon : The Future of UK Aviation*" (July 2017).
- 1.8 Manston Airport is a unique and important strategic transport asset to the UK that is currently unused since its closure in May 2014. Located in the South East where aviation industry demand is highest and most constrained, the airport already has an illustrious history as a Battle of Britain airfield and more than 40 years' experience of commercial operations.

- 1.9 An estimated £2 billion or more is lost to the UK economy each year due to capacity constraints in the London airports system. This figure is set to rise to £3.9 billion by 2050 even with an additional runway at Heathrow. Manston Airport is ideally placed to help recapture the cargo traffic which is being displaced to mainland Europe.
- 1.10 Reopening Manston Airport as a hub for international air freight will help deliver economic prosperity and employment across Kent; address the chronic shortage of runway capacity in the South East and protect a vital aviation resource for the nation.
- 1.11 RiverOak has secured the necessary investment, has the right strategy and the commitment to deliver the Proposed Development, which has been in development since 2014/5. The Proposed Development will help Manston Airport to realise its economic potential and, in doing so, become a vibrant catalyst for economic growth not only in East Kent but across the UK.

a) Overview of the Manston Airport Project

- 1.12 RiverOak's plans are anchored by a significant and much-needed international air freight hub able to handle at least 10,000 air freight movements a year. To achieve this, RiverOak is proposing a multimillion-pound, four-phase construction and redevelopment plan which will be delivered across an estimated 15 years.
- 1.13 The area within the DCO application site boundary is 311.7 hectares (770 acres) of land predominantly inside the existing airport boundary. The DCO application site boundary is shown on the plan provided as Appendix 1 [document number TR020002/APP/4.1].

APPENDIX 1

- 1.14 The proposals include both the use of the existing airport infrastructure and the introduction of new facilities. In summary, the proposals include:
- Upgrade of Runways 10 & 28 to allow CAT II/III operations;
 - Construction of 19 European Aviation Safety Agency (EASA) compliant Code E stands for air freight aircraft with markings capable of handling Code D and F aircraft in different configurations;
 - Re-alignment of the parallel taxiway (Alpha) to provide EASA compliant clearances for runway operations;
 - Installation of new high mast lighting for aprons and stands;
 - Construction of 65,500m² of cargo facilities;
 - Construction of a new ATC tower;
 - Construction of a new airport fuel farm;
 - Construction of a new airport rescue and firefighting service (RFFS) station airport fire station;
 - Complete fit-out of airfield navigational aids;

- Construction of new aircraft maintenance/recycling hangars;
- Development of the 'Northern Grass' area for airport related businesses;
- Demolition of the redundant 'old' ATC Tower;
- Safeguarding of existing facilities for museums on the site;
- Highway improvement works, both on and off site; and
- Extension of passenger service facilities including an apron extension to accommodate an additional aircraft stand and increasing the current terminal size.

1.15 The application proposals are described in full in Chapter 3 of the Environmental Statement (ES) [document reference TR020002/APP/5.2-1] and explained further in the Design and Access Statement [document reference TR020002/APP/7.3]. A copy of the illustrative Masterplan [document reference TR020002/APP/7.1] which shows how the Proposed Development could be provided is provided in Appendix 2.

APPENDIX 2

1.16 Development consent is being sought for the airport development, comprising new buildings and related components and structures. Development consent is also being sought for the principal engineering works and infrastructure works which are required. These works are described in the accompanying Design and Access Statement [document reference TR020002/APP/7.3] and defined on the Works Plans [document reference TR020002/APP/4.4] which include detailed drawings showing the associated earthworks, water infrastructure and landscaping proposals.

b) Why Manston Airport

1.17 The London airports system is overcrowded and there is an urgent need for alternative facilities to serve the air freight market. Air freight is increasingly being bumped from the belly holds of passenger aircraft. In addition, this lack of air freight capacity means that goods bound to and from UK businesses and consumers are flown into mainland European airports and trucked across the English Channel. This adds unnecessary cost and delays to businesses and customers. The Proposed Development will deliver a focussed solution to address the demands of air cargo operators.

1.18 The London airports handle 76% of the UK's total air freight. It is clear that freight operators prefer to fly in and out of the South East and this is where the additional capacity needs to be provided. In comparison to its congested neighbours in the South East, (Heathrow, Gatwick and Stansted) Manston Airport will, with the right investment, have ample capacity and all the characteristics of an ideal freight-focused airport.

1.19 Manston Airport has an existing and lengthy runway; it is close to London but not part of the London airspace control zone; and has easy road access to the national motorway network, Channel Tunnel and mainland Europe. This, together with its ability to focus on providing a dedicated, rapid handling and turnaround service for air freight, makes Manston Airport both an attractive prospect for freight forwarders and cargo airlines and the strongest option available to Government to quickly and easily increase runway capacity in the South-East by making best use of existing runway infrastructure.

- 1.20 Reopening Manston Airport would provide almost immediate relief to the pressing situation that is causing the UK economy to lose more than £2bn in trade every year. The shortage of runway capacity across the South-East airports system remains unaddressed. By Year 6, RiverOak's projections show that Manston Airport will be handling more than 10,000 cargo movements which together would carry more than 180,000 tonnes of inbound and outbound freight.
- 1.21 A revived Manston Airport would provide a realistic complement to the overcrowded London airports, reduce the volume of freight trucked through the Channel Tunnel to mainland European airports, improve the resilience of the UK's airport network, and boost economic growth and jobs in Kent. The impact of the UK leaving the European Union will only serve to make these challenges greater as border controls are reinforced and the logistics of trucking freight in and out of the UK become more complex and the solution that Manston provides more attractive.
- 1.22 In addition, there is evidence that the current absence of a specialist outsized cargo security clearing facility at other UK airports is slowing down the handling of air freight, again providing an opportunity for Manston Airport to provide a unique specialist service for air freight.
- 1.23 A Statement of Reasons [document reference TR020002/APP/3.1] is provided to support the DCO application. This statement sets out the justification for seeking compulsory purchase powers within the DCO and why there is a compelling case in the public interest for the inclusion of the compulsory purchase within the DCO. In summary, the principle reasons are as follows:
- The UK has an urgent need to develop international trade and the Proposed Development would encourage future trade growth by helping to address the urgent need for additional airport capacity in the South-East of England.
 - Development of the site as an airport is the only viable use for it.
 - The UK is losing market share to continental airports.
 - Manston is the most suitable site to develop a cargo- focussed airport in the UK.
 - East Kent is in desperate need of skilled employment and training.
 - A valuable and significant national asset will otherwise be lost.
 - The Proposed Development will provide the UK with modern air cargo customs facilities.
 - Manston will provide a valuable reliever function for the main London airports.
 - The landowner's plans for the site will never come to fruition.
 - The Proposed Development will bring substantial socio-economic benefits both locally and nationally.

c) Requirement for Development Consent

- 1.24 The Proposed Development is considered to be a Nationally Significant Infrastructure Project (NSIP) in accordance with The Planning Act 2008 for the reasons set out in the NSIP justification document

submitted with the DCO application [document reference TR020002/APP/2.3]. The Act defines what types of projects constitute NSIPs. Under section 14(1)(i) of the Act, an NSIP includes 'airport-related development'. Section 23(3)(b) of the Act states that the 'airport-related development' mentioned within section 14(1)(i) includes *'the alteration of an airport in a case within subsection (4)'*. Section 23(4) states that an airport is within this subsection only if *'(a) the airport is in England, or in English waters and (b) the alteration is expected to have the effect specified in subsection (5)'*. One of the effects specified in section 23(5) is *'to increase by at least 10,000 per year the number of air traffic movements (ATMs) of cargo aircraft for which the airport is capable of providing air cargo transport services'*.

- 1.25 It is considered that the Proposed Development is the alteration of an existing airport rather than the construction of a new one. Although the airport closed in May 2014 and no longer has an aerodrome certificate to allow it to operate, the runway, although unmaintained, is still in existence and will be re-used, and the airport did operate from 1916 until 2014. It would be difficult to justify the premise that Manston was not already 'an airport'.

Current Capability

- 1.26 The case presented in support of this DCO application is that the current capability of the airport is zero because, due to the current state of the airport, planning permission would be required for development as defined by Section 55 of the Town and Country Planning Act 1990 and Section 32 of the Planning Act 2008 either to replace, re-establish or introduce infrastructure for the first time, so that it could provide air cargo transport services. Full details are provided in the NSIP Justification Document [document reference TR020002/APP/2.3]
- 1.27 Permitted development rights cannot be relied upon because they are only available to the holder of an aerodrome certificate for at least two years. Part 8, Class F of Schedule 2 to the Town and Country Planning (General Permitted Development)(England) Order 2015 grants permitted development rights to a 'relevant airport operator' or its 'agent of development' on operational land. The term 'relevant airport operator' is defined in Part 8, Class O as meaning a relevant airport operator within the meaning of Section 57A of the Airports Act 1986. That section makes it clear that an airport and a relevant airport operator has to have the benefit of a 'certificate' granted by the CAA on behalf of EASA (Section 57A(2)) and that the CAA may only grant a certificate to an 'eligible airport' (Section 57A(3)(c)). An 'eligible airport' must have an annual turnover of business carried out at the airport by the airport operator exceeding £1 million in at least two of the last three financial years ending before the application for the certificate is made (Section 57A(4)(a)) and that the airport is not excluded by Section 57A(5) (which Manston Airport is not). As the previous aerodrome licence was revoked more than four years ago on 15 May 2014 and no licence has been granted since then, Manston does not satisfy this criterion and, indeed, could not satisfy this criterion until at least two years after re-opening.
- 1.28 The measure of cargo capability of a facility is therefore the number of air transport movements of cargo aircraft for which the airport, together with any improvements that did not need planning permission, was capable of providing air cargo transport services (Planning Act 2008 Section 23(8)(b)). Cargo aircraft are those designed to transport cargo but not passengers and that are engaged in the transport of cargo on commercial terms (Section 23(9)).

- 1.29 In particular, infrastructure items that are currently missing or unusable at the airport including the fuel farm; air traffic control tower and navigational aids would require planning permission to be built to a standard to allow even the most rudimentary airport operations. The NSIP Justification Document [document reference TR020002/APP/2.3] provides full details of the development that would need planning permission to enable the airport to provide air cargo transport services.
- 1.30 Therefore without the replacement, reinstatement or introduction of the essential airport facilities and infrastructure which requires planning permission, and in the absence of an airport operator who has an EASA certificate, the capability of the airport to provide any air cargo transport services is currently zero.

Applied-for Capability

- 1.31 No limit on daytime flights is being applied for, and therefore the applied-for capability is the physical capability of the Proposed Development to handle flights during the day. For the avoidance of doubt, night-time restrictions are being proposed. Applied-for capability is a measure of the number of aircraft movements requiring cargo services that can be facilitated by the Proposed Development.
- 1.32 The factors that could potentially constrain the capability of a cargo airport are the throughput of the runway, the number of aircraft that can simultaneously be handled, and the ability to handle cargo at the airport safely and to transport it over the surface transport network.
- 1.33 As the threshold in the Planning Act 2008 is for air cargo movements rather than tonnage of cargo, the ability to handle substantial quantities of cargo is not relevant to capability.
- 1.34 This leaves the critical factor as the ability to handle aircraft safely and simultaneously. RiverOak's aviation expert advice is that on a conservative basis, a single cargo stand can turn around an aircraft every 2.5 hours, i.e. six aircraft or 12 movements between 0700 and 2300 per day.
- 1.35 The Proposed Development is to reconstruct the airport with 19 cargo stands (and some passenger stands, which will not handle cargo aircraft), the construction of which will involve development in planning terms. Using the figure of six arriving and departing aircraft per stand per day (i.e. between 0700 and 2300 – as only limited night flights are contemplated), one arrives at a theoretical maximum capability figure of $(19 \times 12 \times 365 =)$ 83,220 movements per year, and therefore the capability of the airport will be at that level, noting that this is theoretical capability rather than predicted operation.
- 1.36 The increase in capability is therefore 83,220 movements per year of cargo aircraft, more than eight times the required threshold, assuming the existing capability is zero, as demonstrated above.

d) Non-statutory and Statutory Consultation

- 1.37 Prior to submitting the DCO application, RiverOak undertook a series of statutory and non-statutory consultations which invited comments from the general public, local authorities and key stakeholders. Full details are provided in the accompanying Consultation Report [document reference TR020002/APP/6.1].
- 1.38 A series of informal and non-statutory consultation events took place in July 2016. 90% of local people who took part in the informal consultation supported proposals for reviving Manston Airport as an air freight hub with complementary passenger and engineering services. A further 8% of

respondents said they opposed the plans and 2% were not sure. More than 800 responses were received.

During June and July 2017, RiverOak formally consulted on their development proposals in preparation for the Development Consent Order application. The consultation fulfilled the requirements set out in the Planning Act 2008 and allowed the scheme to be refined prior to submission of the DCO application. Seven public consultation events were held across the consultation period, with over 1,350 attendees. An additional four evening parish events were held which were attended by over 570 people. A total of 2,174 responses were received to the consultation. Within the consultation Feedback Form, RiverOak asked respondents 'to what extent do you agree or disagree with our proposals for Manston Airport?' Of the 1,806 responses, 51.8% either strongly agreed or tended to agree and 29.4% either strongly disagreed or tended to disagree. 0.3% indicated no opinion. The main themes from the consultation responses were:

- Health, noise and air quality impacts
- Impact of night flights
- Flight paths
- Consultation process
- Economic and employment opportunities

1.39 In January and February 2018, a second statutory consultation was held building on the statutory consultation that took place in Summer 2017. This consultation allowed the public and all stakeholders an additional opportunity to comment upon the scheme proposals following further scheme developments including updates to the environmental assessment that had been made in line with the latest EU Directive. The consultation event included the launch of the proposed Noise Mitigation Plan. Two public consultation events were held across the consultation period, in Ramsgate and Herne Bay, with nearly 900 attendees. A total of 1,318 responses were received to the consultation. The main themes from the consultation responses were:

- Noise and air quality impacts
- Other environmental impacts
- Impact of night flights, including comments on the draft Noise Mitigation Plan
- Flight paths
- Consultation process
- Economic and employment opportunities

1.40 The Consultation Report submitted with the DCO application [document reference TR020002/APP/6.1] provides a full analysis of the key themes that were raised in both the formal and informal consultations and how the scheme has responded to the feedback. It also provides full details of the numerous presentations that were given to the local authorities, key stakeholders and local organisations prior to the DCO application being submitted.

- 1.41 It is evident from all three consultation events that there remains considerable local support for the Proposed Development with the economic, employment and regeneration benefits being highlighted as key beneficial impacts. This has been a consistent theme throughout the consultation events and generally amongst the local community. Indeed community support for growth at the airport has remained consistent even from as far back as 2005 when there were proposals to expand the then operational airport. At that time, a MORI research report for Thanet District Council '*Section 106 Agreement Consultation*' (March/April 2005) recorded that 85% of residents surveyed supported airport expansion with 63% being strongly in support of such proposals. The considerable support for the Proposed Development carries significant weight.
- 1.42 RiverOak has been developing a Statement of Common Ground (SoCG) with a number of statutory consultees, statutory undertakers and interested parties during the preparation of the DCO. The SoCGs seek to identify matters on which parties agree and to track progress towards the resolution of any matters where agreement has not yet been reached. The SoCGs will be updated in consultation with the relevant bodies throughout the DCO determination process and they will be submitted to the Examining Authority at the appropriate time.

e) Other consents being sought by the DCO

Compulsory Purchase

- 1.43 The DCO includes compulsory acquisition powers. The Land Plans [document reference TR020002/APP/4.2] identify the land interests which are required for the construction and operation of the Proposed Development and the Statement of Reasons [document reference TR020002/APP/3.1] sets out the reasons why powers of compulsory purchase are necessary.
- 1.44 Powers are sought to acquire outright the main airport site, the land to the north of the B2050 (hereon in referred to as the 'Northern Grass') and the subsoil where the pipeline to Pegwell Bay is positioned. Powers are also sought to acquire part of the B2050 (Manston Road) to allow it to be realigned.
- 1.45 Powers are sought for the permanent creation of rights in the two areas of landing lights to the east and west of the airport and access from the public highway to the pipeline at various points. Powers are also sought for temporary occupation of the B2190 (Spitfire Way) to allow it to be improved, although it will remain at least partly open to traffic at all times.
- 1.46 Whilst the majority of the land included within the Order limits consists of the land forming part of the former Manston Airport site, the extent and the nature of the Proposed Development (including the consequential Civil Aviation Authority (CAA) and EASA requirements) would necessitate reconfiguration of some of the existing facilities/infrastructure and the construction of new ones as well as some, although minor, changes to the existing site boundary.
- 1.47 The Statement of Reasons concludes that there is a 'compelling case in the public interest' to satisfy the tests set out in Section 122 of the Planning Act 2008 and therefore, to justify the use of powers of compulsory purchase within the DCO. Its principal reasons for reaching that conclusion are set out below.
- The Government in its draft Aviation Strategy make it clear that there is an urgent need for additional runway capacity in the South East of England and specifically for air freight. Without

new airport infrastructure, the objectives of the Government's aviation policy cannot be fulfilled.

- In order to secure airport infrastructure that will enable the UK to meet its identified demand to 2030 and beyond, there is a requirement for more intensive use of existing airport capacity especially in light of the very important role that aviation will play in the UK's economic success in a post-Brexit world. As the UK shifts towards more global trade, the importance of air freight to the economy will increase. British exporters will be looking to capitalise on new trade agreements and reach countries further afield. Similarly, the country's changing relationship with the EU will make current practices of trucking air freight to and from continental airports across the Channel even more difficult with the introduction of border checks and potentially new tariffs.
- Aviation has a key role to play in achieving the Government's ambitions to increase productivity and grow the economy (Government's draft Aviation Strategy, July 2017). However, London and the South East are now facing longer term capacity problems. Heathrow Airport is operating at full capacity today, Gatwick Airport is operating at capacity at peak times, and the whole London airports system is forecast to be full by 2040. In view of the urgent need for additional runway capacity in the South East and especially additional air freight capacity, it is important that additional runway capacity is made available as soon as possible and significantly earlier than 2030 and the new runway provision at Heathrow Airport. Significant weight should be attached to the considerations of need and the weight to be attributed to need in any given case should be proportionate to the anticipated extent of the Manston Airport Project's contribution to meeting that need.
- There is no other airport or airfield in the South East that could realistically be able to provide a service like that which could be provided at Manston Airport. The existing runway is both lengthy and wide and places no immediate restrictions on the number or type of aircraft that could be handled. The airport is sufficiently located away from other London airports which avoid issues of airspace congestion, but with convenient road access to London and beyond. The focus on handling air freight will mean that dedicated services can be provided without passenger services taking priority. Additionally, the capacity of the surface access networks dictate that freight transportation will not be hampered by congestion issues. Furthermore, the socio-economic benefits that would be delivered including economic prosperity through direct and indirect airport employment; tourism; tax revenues and inward investment and education benefits.

1.48 These public benefits in the timescale envisaged are therefore clear, very substantial and compelling. Additional and substantial local and sub-regional economic benefits of the project further contribute to the compelling case (see Section 8 of this statement).

f) Other licences and permits

1.49 Additionally, the DCO replaces the need to seek consent for some of the licences and permits which will enable the proposed development to be constructed and operated and for which the Planning Inspectorate is not the authorising body. Document reference TR020002/APP/7.6 provides details of other consents and licences that may be required.

g) Airspace Route and Operating Procedures

- 1.50 In addition to obtaining approval for development consent, approval will also be required for the new airspace and operating procedures from the Civil Aviation Authority (CAA). This approval is obtained via submission of an Airspace Change Proposal in accordance with regulations laid down by the CAA. Preliminary discussions on this and other related topics have been held between RiverOak, the project team and the CAA.
- 1.51 It will be the airspace change process that ultimately provides permission for the detailed operating procedures and airspace required by the airport and not the DCO. Following discussions with the CAA, it is anticipated that the airspace change application will be submitted as soon as the DCO has been accepted. In this way the consenting regimes will remain complimentary and duplication of effort for RiverOak, the respective regulators and other interested parties, will be minimised.
- 1.52 The final decision on exactly where aircraft will be routed will be decided as part of the CAA's Airspace Change Process. A number of factors will influence this decision including, but not limited to, flight testing, connectivity to the wider air traffic network and route development together with a further round of environmental assessment and public consultation. So that an assessment of the operational effects of the proposed development can be undertaken as part of the ES, a set of expected flight routes and procedures have been prepared for the project. These provide a 'route swathe' which represent a worst case scenario for the operational airspace effects of the proposed development; the final refined design will then be agreed with the CAA through the Airspace Change Process. The ES submitted with this DCO application contains the worst-case assessment of the environmental effects of flights, noise being the principal effect, and the CAA will then approve flightpaths within the swathes assessed in the ES. This approach of developing initial 'route swathes' which allow public engagement to inform subsequent detailed route design and refinement is entirely in line with best practice and will be reflected in the CAA's revised airspace change process which was introduced in December 2017.
- 1.53 The DCO includes document reference TR020002/APP/7.5 which is the CAA Interface Document. This document provides further information about the airspace change process and aerodrome certification process used by the CAA which are of relevance to the DCO and the processes and regulations that the airport will need to comply with prior to commencement of operations.

h) Controls and Conditions

- 1.54 The draft DCO [document reference TR020002/APP/2.1], and the Register of Environmental Actions and Commitments [document reference TR020002/APP/2.5] lists the requirements which are intended to condition and control the development that is being proposed. The Register of Environmental Actions and Commitments includes measures which RiverOak suggest may be appropriately imposed on the grant of development consent in order to regulate the design, construction and operation of Manston Airport.

i) Approach to Planning Appraisal

- 1.55 This is discussed in greater detail in Section 5 of this statement in the context of the appropriate consenting regime as set out in the Planning Act 2008.

j) The Approach to Environmentally Assessing the Proposed Development

- 1.56 As the development will be delivered on a phased basis over a number of years, the permission that is being sought is based on clearly defined parameters which establish the framework within which the development will take place. The Environmental Impact Assessment (EIA) takes account of the need for the project to evolve over a number of years within the parameters, and reflects the likely significant effects of such a flexible project. The flexibility that is sought for the project will be reflected in appropriate development consent provisions and requirements. This approach is an acknowledged way of dealing with an application comprising EIA development where details of a project cannot be resolved at the time when the application is submitted. This approach is entirely acceptable and in accordance with the PINS Advice Note 9 on the 'Rochdale Envelope' (February 2011).
- 1.57 Where details will not be known until the detailed design stages of the development process, for example the exact location of buildings that will be demand-led, the ES sets out the relevant design parameters used for the assessment and explains, with reference to the parameters, what the maximum extent of the proposed development may be (the 'worst case'), and assesses the potential adverse effects which the project could have, to ensure that the impacts of the project as it may be constructed have been properly assessed. Other details such as the length and width of the runway and taxiways are 'fixed' for the purposes of the DCO.

In the event that development consent is granted and at a later stage RiverOak wishes to construct it in such a way that it is outside the terms of what has been consented (and assessed), it will be necessary for RiverOak to apply for a change to be made to the development consent provided under the Planning Act 2008. Again, this is an accepted approach set out in the PINS Advice Note 9.

k) Plans and Drawings

- 1.58 There are 14 different types of plans and drawings each showing different elements of the Proposed Development. The plans that are most relevant to understanding the proposals for development are as follows:
- **TR020002/APP/4.1** – Location Plan which shows all the land required by the Proposed Development.
 - **TR020002/APP/4.4** – Works Plans which show the proposed limits of the DCO.
 - **TR020002/APP/4.6** – Access and Rights of Way Plans which show any proposed changes to public roads, footpaths, bridleways and rights of access to these.
 - **TR020002/APP/4.9** – Traffic Regulation Measures Plans which show the traffic management measures which are proposed to be implemented during the construction of the Proposed Development.
 - **TR020002/APP/4.14** – Design Drawings which provide details on the size and height of the new infrastructure being proposed.

l) Purpose and Structure of the Planning Statement

- 1.59 This Planning Statement draws upon the conclusions of many of the documents that support the DCO and interprets them against the relevant planning policies. It should therefore be read alongside these documents especially the Draft Development Consent Order [document reference

TR020002/APP/2.1] and the Environmental Statement [document reference TR020002/APP/5.2-1 to 2-15].

1.60 The remainder of this statement is structured as follows:

- **Section 2:** Describes the site context and the history of the Manston Airport site.
- **Section 3:** Describes the Proposed Development.
- **Section 4:** Sets out the relevant principles that have informed the development proposal.
- **Section 5:** Sets out the relevant consenting regime under which the DCO will be determined.
- **Section 6:** Sets out the Government's aviation policy against which the development proposals will need to be considered.
- **Section 7:** Sets out the relevant national planning policy against which the development proposals need to be considered.
- **Section 8:** Describes how the Proposed Development 'fits' within key strategic and local plans and frameworks.
- **Section 9:** Is the planning assessment of the development proposals against the relevant planning policies.
- **Section 10:** Sets out the conclusions and why the scheme is acceptable in planning policy terms.

2 SITE CONTEXT AND HISTORY

a) Site History

- 2.1 Aircraft activity began at Manston in 1915 when military aircraft used the site for emergency landings. 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).
- 2.2 The airfield was extensively used during World War II, notably to test bouncing bombs at Reculver and by Hawker Typhoon and Meteor squadrons. The airport was also the set off point for the famous Channel Dash mission. Its location in East Kent meant it was critical during wartime operations as the first airport available for damaged aircraft returning home from Europe.
- 2.3 In the 1950s the United States Air Force (USAF) used Manston as a Strategic Air Command base for its fighter and bomber units. The USAF withdrew from Manston in 1960 and the airfield became a joint civilian and RAF airport.
- 2.4 From 1989 Manston became known as Kent International Airport and a new terminal was officially opened that year. In 1998 the Ministry of Defence announced plans to sell off RAF Manston. Operations at the airport continued with 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 hub servicing a range of operators.
- 2.5 In 2004, works began to make the airport a low cost airline hub and Irish airline EUJet began scheduled flights in September 2004 to a number of destinations across the UK. EUJet operated flights from Sept 2004 until July 2005. In July 2005, all EUJet operations were suspended along with all non-freight operations because of financial difficulties with the airport and airline's operating company.
- 2.6 The airport was purchased by Infratil in August 2005 who operated a select number of charter passenger flights to specialised destinations. By 2010, Flybe began operating daily flights from Manston to Edinburgh, Kirkwall, Sumburgh, Belfast, and Manchester. These flights ceased from March 2012. Subsequently, KLM Royal Dutch Airlines operated double daily flights from Manston to Amsterdam from April 2013.
- 2.7 In October 2013, Infratil sold Manston Airport to a company owned by Ann Gloag, co-founder of Stagecoach Group. Manston Skyport Ltd took over running the former airport on 29 November 2013. The airport was closed in May 2014. Despite the airport's closure, much of the airport infrastructure, including the runway, taxiways, aprons, cargo facilities and passenger terminal remain.

b) The DCO Application Site

- 2.8 The DCO application site is on the existing site of Manston Airport, west of the village of Manston and north east of the village of Minster, in Kent. The town of Margate lies approximately 5km to the north of the site and Ramsgate approximately 4km to the east. Sandwich Bay is located

approximately 4-5km to the south east. The northern part of the site is bisected by the B2050 (Manston Road) and the site is bounded by the A299 dual carriageway to the south and the B2190 (Spitfire Way) to the west. The existing site access is from the junction of the B2050 with the B2190.

2.9 The DCO application site covers an area of approximately 311.7 hectares (770 acres) and comprises a combination of existing buildings and hardstanding, large expanses of grassland, and some limited areas of scrub and/or landscaping. This includes the 2,748m long, 60m wide runway, which is orientated in an east-west direction across the southern part of the site. The existing buildings are clustered along the east and northwest boundaries of the site and include:

- a cargo handling facility comprising two storage warehouses 6 - 8m high, and one hangar 12m high, all finished with metal cladding, on an area of 5,200m², with gated entrances and a security box;
- a 12m high fire station building, constructed of brick and with a corrugated metal roof, on an area of 2,200m²;
- a helicopter pilot training facility comprising two 10m high hangars with metal cladding, on an area of 950m² ;
- two 5m high museum buildings of brick construction, on an area of 2,000m²;
- a 4m high terminal building, on an area of 2,400m²;
- a 6m high Air Traffic Control (ATC) building, including a 9m high viewing tower, on an area of 700m²;
- a 12m high airplane maintenance hangar, with a taller 16m high movable section to enclose an airplane tail fin, on an area of 4,700m²; and
- a fuel farm.

2.10 A network of hard surfacing, used for taxiways, aprons, passenger car parking, and roads connects the buildings to the runway and to the two main airport entrance points that are located in the east and west of the site. The buildings and facilities are generally surrounded by grassland and during previous operations this was kept closely mown. Landscape planting is limited to lines of ornamental trees and shrubs along some sections of the boundary such as with the B2190, around some buildings and in car parking areas on the eastern edge. Post and wire security fencing of varying height runs alongside most of the airport perimeter.

2.11 The Northern Grass – the part of the site to the north of Manston Road (B2050), which bisects the centre of the site in a roughly east to west direction, is predominantly grassland, with some areas of hard standing, including a stretch of taxiway that formerly linked across to the main taxiway network. The two museums, the Spitfire and Hurricane Memorial Museum, and the RAF Manston Museum, are located in the south-western corner of the Northern Grass. A small number of other redundant buildings, such as the former RAF air traffic control tower, are also located on the Northern Grass.

2.12 RiverOak do not own the land comprising the application site. Most of the land within the existing airport perimeter is owned by Stone Hill Park Limited. Consequently, the DCO application also includes an application for powers of compulsory acquisition.

c) The Surrounding Area

- 2.13 The site is located within National Landscape Character Area 113: North Kent Plain. This encompasses an approximately 90km long strip of land bordering the Thames Estuary to the north and the chalk of the Kent Downs to the south. The site is also within the Thanet Landscape Character Area. This features a centrally domed ridge on the crest of which the airport is dominant. The area is generally characterised by open, large scale arable fields with long views.
- 2.14 The surrounding area is generally characterised by a moderate density of villages, small groups of residential properties and individual properties. These include:
- properties at Bell Davies Drive and Esmonde Drive to the north;
 - properties at the southern end of Manston Court Road to the east of the airport;
 - properties on the north side of the B2190 Spitfire Way;
 - properties on the north-west side of Manston Road;
 - properties along either side of Manston Court Road;
 - properties at the southern end of Manston High Street; and
 - those parts of Cliffsend adjacent to Canterbury Road West.
- 2.15 Not immediately adjacent but within 0.5km to 1km are several smaller settlements including Manston, Minister, Cliffsend, Acol, All and Grange Lane and Woodchurch.
- 2.16 The site is located 4.3kms west of Ramsgate railway station; 5.5kms north-east of Minster railway station and 7.2kms south-west of Margate railways station.
- 2.17 The entire site is in Flood Zone 1 where the risk from flood is low. The Manston Airport site is underlain by a chalk aquifer which the Environment Agency (EA) considers to be of strategic and local importance.
- 2.18 There are no statutory environmental designations that apply within the DCO application site. However, the outfall corridor goes through/under the Sandwich Bay Special Area of Conservation (SAC) and its constituent Site of Special Scientific Interest (SSSI) (Sandwich Bay to Hacklinge Marshes). The outfall discharges into the Thanet Coast and Sandwich Bay Special Protection Area (SPA) and Ramsar site.

d) Planning History

- 2.19 The Manston Airport site has a lengthy planning history. A summary is provided in Appendix 3. More detail is provided below on key planning permissions and decisions that have been granted in respect of the Manston Airport site as they are relevant to the consideration of this DCO application.

APPENDIX 3

Planning application by Stone Hill Park Limited (Thanet District Council application number OL/TH/16/0550) (May 2016)

- 2.20 Stone Hill Park Limited submitted a hybrid planning application to Thanet District Council on Tuesday 31st May 2016 for the comprehensive redevelopment of the Manston Airport site to create a new, mixed-use settlement comprising up to 2,500 new homes; an advanced manufacturing focused business park with some distribution/storage and office space; large scale – indoor and outdoor – sports and recreational facilities with the former runway becoming part of a network of parkland, trails and outdoor space; and a new heritage hub which will accommodate the Spitfire and Hurricane Memorial Museum and RAF Museum.
- 2.21 The outline element comprises an outline planning application (with all matters except access reserved for future determination) for the provision of buildings/floorspace for the following uses; Employment (Use Classes B1a-c/B2/B8), Residential (Use Classes C3/C2), Retail (Use Classes A1-A5), Education and other non-residential institutions (Use Class D1), Sport and Recreation (Use Class D2), Hotel (Use Class C1), Open space/landscaping (including outdoor sport/recreation facilities), Car Parking, Infrastructure (including roads and utilities), site preparation and other associated works.
- 2.22 The full/detailed element of the application comprises change of use of retained existing buildings, Development of Phase 1 comprising four industrial units (Use Class B1c/B2/B8) with ancillary car parking and associated infrastructure and access.
- 2.23 Revisions to the planning application were submitted to Thanet District Council in October 2017 following additional work by the Applicants and in response to representations made by the Council and other statutory consultees. The main changes to the scheme relate to the boundaries of the various development zones of the Masterplan; relocation of the special outdoor water based recreation zone; introduction of additional land use controls including controls against ground works in certain areas; an amendment to the development zone north of Manston Road to allow options for strategic highways improvements; revisions to road layouts and the western access to the site; and introduction of footpath/cycle connections to Canterbury Road West.
- 2.24 The description of development is unchanged by the revisions but the phasing for delivery of the Masterplan over the next 15-20 years has changed.
- 2.25 At the time of writing, the planning application was missing key environmental and other information (including a Financial Viability Assessment) that had still not been supplied by the Applicants in over two years since submission. This puts into question the seriousness of the Applicants intentions. The application is some way off from being determined. Thanet District Council is unable to confirm when a decision on the planning application is likely. The planning application represents a departure from the Development Plan as it conflicts directly with saved Policy EC4 of the 2006 Thanet Local Plan. For this and the following reasons, it is highly unlikely that planning permission would be granted:
- There is no demonstrated, or demonstrable, need for the housing being sought;
 - Insufficient infrastructure exists and is not being sought at this isolated site to support such a significant increase in population, including road access, gas, electricity, water and sewerage services;

- There are environmental issues that have not been adequately dealt with;
- It has attracted several significant objections from statutory bodies, including the Ministry of Defence, who will not allow housing to be built near its equipment; and
- It is a high cost project in a low value area and could never be financially viable.

2.26 Stone Hill Park Limited confirmed that they would be progressing a planning application for an enhanced masterplan for the new settlement, incorporating feedback from a consultation process held in November 2017. A hybrid planning application was submitted to Thanet District Council on 4th May 2018 and was made valid on 9th May 2018. This application has not replaced planning application OL/TH/16/0550 as this application remains live pending a decision.

2.27 The May 2018 application (reference OL/TH/18/0660) proposes the comprehensive redevelopment of the site for the provision of a mixed use development. The outline element comprises an outline planning application (with all matters except access reserved for future determination) for the provision of buildings/floorspace for the following uses; Employment (Use Classes B1a-c/B2/B8), Residential (Use Classes C3/C2), Retail (Use Classes A1-A5), Aviation (Sui Generis), Education and other non-residential institutions including museums (Use Class D1), Sport and Recreation (Use Class D2), Hotel (Use Class C1), Open space/landscaping (including outdoor sport/recreation facilities), Car Parking, Infrastructure (including roads and utilities) are also proposed. The full/detailed element of the application comprises a change in the use of retained existing buildings and their means of access. The statutory expiry date for the application is quoted as 15th August 2018 although officers have confirmed that it is 29th August 2018 (16 weeks from the date of validation).

2.28 The proposals comprise the following:

- Up to 3,700 new residential dwellings, across a wide range of housing types, sizes and tenures, with up to 250 units age-restricted for elderly persons;
- Up to 46,000 sqm (GIA) of employment floor space, with a focus on advanced manufacturing with some storage/distribution/office use;
- Retention and re-use of the western 1,199m of the existing runway for use by heritage, vintage and classic aircraft, alongside relocation of the existing RAF Manton Museum and Spitfire and Hurricane Museum to new facilities directly adjoining the runway;
- 'East Kent Sports Village' directly adjoining the new heritage aerodrome, including provision for a 50m swimming pool, outdoor 'wave garden', outdoor sports pitches, hotel and other ancillary development;
- One main new Local Centre, with provision for shops (including a small/medium-sized foodstore), services, cafes/restaurants, GP and pharmacy, community hall, hotel and other leisure facilities, with smaller satellite village centre to serve the immediate needs north of Manston Road;
- Two new primary schools, with combined capacity of up to six forms of entry;

- Potential for a small-scale campus for higher/further education located in close proximity to the employment hub, which will train people in the skills needed to support future businesses;
- 133 hectares of green infrastructure (45% of the total site area), including a repurposed runway recreational area at the eastern extent of the runway, habitat and ecological areas and structural planting, and community orchard and allotments, all connected by a network of local green spaces;
- Retention and integration of a number of existing buildings on Site through proposed Change of Use; and
- A network of new streets, pedestrian/cycle routes, associated car parking, and site preparation/enabling/landscaping/infrastructure works.

2.29 The Applicants state that the proposed development will be built in three 'stages' over the next 15-20 years. The three stages are as follows:

- Stage 1 - up to 1,100 homes (of which a maximum of 300 will be provided north of Manston Road) alongside up to 10,500 sqm of employment floorspace (limited to 5,661sqm if the wave garden is also delivered in Stage 1); the wave garden; museums; aviation uses; a proportion of main town centre uses; and one primary school.
- Stage 2: up to 1,400 homes (south of Manston Road) alongside up to 10,500 sqm employment floorspace (plus an additional 4,839sqm if the wave garden is provided in Stage 1); the remainder of the East Kent Sports Village; hotel; and a proportion of main town centre uses;
- Stage 3: remaining balance of 1,200 homes; one primary school; and the balance of all other proposed uses.

2.30 The proposals presented in the new hybrid planning application still represent a departure from the Development Plan and are equally unacceptable in planning terms for the reasons set out above in connection with planning application OL/TH/16/0550. The 2018 application has attracted several significant objections from statutory bodies including many who objected to the 2016 application often because they have not been satisfied that the Applicants have overcome previous concerns in submitting their alternative scheme.

Operation Stack

2.31 The Town and Country Planning (Operation Stack) Special Development Order 2015 (as amended by The Town and Country Planning (Operation Stack) Special Development (Amendment) Order 2017 came into force on 2nd September 2015 and which following an extension of the time period that it covers, now expires on 31st December 2019. This Order allows for part of the runway at Manston Airport to be used for non-aviation use namely the stationing of goods and vehicles and use of the control tower as a co-ordination centre and the erection of temporary structures. Despite the special development order, Manston Airport has never been used in connection with Operation Stack, and Operation Stack has not been invoked at all since 4 August 2015.

2.32 The very special reasons in the local, regional and national interest that justified this temporary departure from the preferred use of the land as an airport are set out in full in the House of Commons

Transport Committee Operation Stack (First Report of Session 2016-17), 1st June 2016. It is very clear from this report that using the Manston Airport site was only ever a short-term measure (paragraph 23) as a result of the Government coming under pressure to find a way of mitigating the negative effects of Operation Stack by way of a temporary off-road lorry park.

- 2.33 The Town and Country Planning (Operation Stack) Special Development (Amendment) Order 2017 granted planning permission for a freight holding area at Manston Airport until 31st December 2019. After this time, the land reverts to its previous lawful use which is as an airport.
- 2.34 Public views on a proposed permanent solution to avoid the need for Operation Stack were invited as part of a six-week listening exercise that was launched on 11th June 2018 by Highways England. A series of public information events across Kent will be the start of a longer-term consultation process aimed at identifying permanent improvements to how freight traffic is managed when there is disruption to cross channel services in future.

Lothian Shelf (718) Limited appeals decision (July 2017)

- 2.35 In July 2017, the Planning Inspectorate provided their decision on four planning appeals that were submitted by Lothian Shelf (718) Limited following a Public Inquiry that was held between 14th and 17th March 2017. Lothian Shelf (718) Limited has been renamed as Stone Hill Park Limited who are the landowners of Manston Airport. RiverOak appeared at the Public Inquiry as a 'Rule 6' party to provide evidence for why the appeals should not be granted.
- 2.36 The appeals were refused. They related to four planning applications that proposed the change of use of four existing buildings on the Manston Airport site from *sui generis*, airport related uses to flexible B1(b-c), B2 and B8, non-airport related uses. A copy of the appeal decision (reference APP/Z2260/W/15/3140995) is provided as Appendix 4.

APPENDIX 4

- 2.37 The appeal decision is very important to the determination of the DCO application. The Inspector confirmed that significant weight should be attached to the relevant planning policies that seek to protect the airport for aviation uses. The decision also confirms that the relevant local planning policies that protect the airport for such uses are entirely consistent with the Government's Aviation Policy Framework which fully recognises that the aviation sector is a major contributor to the national economy which facilitates trade and investment.
- 2.38 It is important to set out in the context of this DCO application, the very significant and recent conclusions that the Inspector established within his appeal decision. These are as follows:
- The draft new Thanet Local Plan is in its early stages and the latest version is still subject to various outstanding objections including in respect of Policy SP05 (Manston Airport);
 - Little weight can be afforded to the draft new Thanet Local Plan at this time – the policies may change;
 - Closure of the airport should not mean that the saved policies in the adopted Thanet Local Plan (2006) should automatically be accorded less weight or that they are out-of-date;

- Policy EC4 in the adopted Thanet Local Plan is consistent with the NPPF, national aviation policy notwithstanding its age;
- Policy EC4 continues to carry significant weight in the overall planning balance;
- Until a new policy framework exists at the airport, Policy EC4 should not be disregarded;
- Granting permission for non-aviation uses would undermine the current policy protection afforded to the airport land be seen as setting a precedent; and
- Consistent application of Policy EC4 is required to prevent the site becoming anything other than an airport.

3 THE PROPOSED DEVELOPMENT

- 3.1 The proposal is to reopen Manston Airport as an air freight hub with associated business aviation and passenger services.
- 3.2 The Design and Access Statement [document reference TR020002/APP/7.3] and Environmental Statement (Chapter 3) [document reference TR020002/APP/5.2-1] describe the proposed development in detail in accordance with PINS Advice Note 9 which provides guidance in the use of the Rochdale Envelope approach in the case of an application for a NSIP and the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. The proposals for development are further illustrated on the plans submitted with the DCO application. A summary of the Proposed Development is provided in Section 1 of this statement. A fuller description of the proposed development is provided below and should be read alongside other DCO application documents.
- 3.3 A Masterplan showing an illustrative layout for the Proposed Development [document reference TR020002/APP/7.1] is provided in Appendix 2 of this statement. The Masterplan is 'zoned' into different areas depending on the proposed land use. A series of indicative visuals of the Proposed Development have also been prepared and are provided in the Design and Access Statement [document reference TR020002/APP/7.3] and Chapter 3 of the ES.

a) Detailed Description of Development

- 3.4 A detailed description focussing on each element of the works to be undertaken as part of the Proposed Development is presented below:

Runway, Taxiway, Apron and Stands

- 3.5 It is proposed that the existing 2,748m, east-west aligned runway is retained. Following the granting of the DCO, and prior to commencements of any construction activities, a full assessment of the runway condition would be undertaken. It is likely that rehabilitation would be required to improve the load bearing capacity for future aircraft operations and in order to ensure compliance for CAT II/III operations. This is likely to require a minimum 150mm overlay of bituminous materials across the runway- see drawing numbers NK018417 RPS-MSE-XX-DR-C-2005 and NK018417 RPS-MSE-XX-DR-C-2073.
- 3.6 The operational part of the runway paved area is currently 60m wide. The original concrete paving for the Second World War runway was built to accommodate safe landing for damaged aircraft and is up to 230m wide in places. The area of the runway to be refurbished for aircraft traffic covers a standard operational width of 45m with 7.5m shoulders (60m paved total).
- 3.7 The total paved area each side of the runway extends 80m to the south and 150m to the north of the runway centreline. This paved area is not considered to provide an aviation benefit and could represent a risk to aircraft operations if loose material was dislodged and migrated onto the runway surface. Although it would be possible to remove the excess paved areas, the EA have indicated that as little of the existing hardstanding as possible should be removed. The existing parallel taxiway (Taxiway Alpha) is currently not compliant with EASA guidelines due to the separation distance from the runway to allow for the taxiing of larger classes of aircraft. Therefore, a new taxiway Alpha, plus

associated taxiways to serve the new cargo stands, will be required. It is proposed that the new taxiways will be constructed through either asphalt, concrete or a composite combination of these materials.

- 3.8 A total of 19 Code E stands would be created to service the air freight operations, accompanied new taxiways to service the stands and connect them to the runway. The total area for the new taxiway and aircraft stands is anticipated to be approximately 574,500m².
- 3.9 The existing passenger apron, which can accommodate four Code C passenger aircraft stands, will be retained. Rehabilitation or refurbishment may be required to ensure compliance with EASA guidelines. If required, this apron will be extended during Construction Phase 4 to provide an additional passenger aircraft stand.
- 3.10 Positive drainage, where the drainage has been designed so that all surface water run off flows into the airport drainage network, will be provided on all stand areas. High mast lights would provide the required lighting for operational aircraft stands; it is expected these will vary in height from 15m to 25m depending on Obstacle Limitation Surface (OLS) requirements.
- 3.11 It is assumed that all airport stands would incorporate fixed electrical ground power (FEGP) units, making the requirements for auxiliary power units (APU) minimal.
- 3.12 The area north of the existing runway, where the new stands and taxiways will be constructed, currently has a gradient of more than 1.5%. In order to comply with the EASA guidance on airport design, the gradient for longitudinal slopes on taxiways should not exceed 1.5%, while on aircraft stands the slope should not exceed 1% in any direction.
- 3.13 Therefore, earthwork operations will be required to provide a suitable and compliant building platform for the taxiway, aprons and stands. The majority of this work would be completed during Construction Phase 1 in order to minimise disruption to live airport operations. It is estimated that approximately 300,000m³ of material will be required. At this stage, a cut dispose-import solution is assumed by importing the required engineering fill material. Excavated material from the site will likely be disposed of off-site, with new engineering fill material imported for the construction. The re-use of site won material, (e.g. from the removal of existing taxiways and areas of hardstanding), will be considered, where deemed viable. However, until an assessment of the suitability of this material is undertaken, it has been assumed that all engineering fill material will be imported.

Air Traffic Control, Navigations Aids, Radar and Lighting

- 3.14 In order to gain a CAA aerodrome licence and compliance with EASA guidance, new equipment and facilities are required. Much of the equipment required to operate the airport is inadequate or has been removed.
- 3.15 The existing ATC building (north of the runway) will not allow controllers to safely and easily operate the new configuration of the re-opened airport, owing to the requirement for a new ATC facility.
- 3.16 A study is currently being completed regarding the provision of an offsite ATC facility. This could result in the removal of the ATC building and its replacement with a series of Closed-circuit television (CCTV) cameras which are linked to a remote ATC service. Until investigations are complete and discussions have been held with the CAA, it is assumed that a replacement ATC facility and

associated equipment is required. Current proposals present a replacement facility north-west of the main airport site, adjacent to the air freight cargo stands. Here, the controllers will have uninterrupted views of the runways, taxiways, both thresholds and cargo stands.

- 3.17 The passenger stands would be obscured by the cargo facility. In order to minimise the height of the proposed structure, the management of aircraft movements on the passenger apron will be via a network of CCTV cameras linked backed to the new ATC.
- 3.18 The proposed facility will have a diameter of approximately 6m with an overall footprint of approximately 500m², inclusive of the adjacent building annex. The tower will include an operational room with a viewing height of 23m above ground level, with the roof of the tower at 27m above ground level. Options for construction of the tower could include a steel frame or slip form concrete.
- 3.19 An annex to the tower will provide space for the additional airfield operation equipment and departmental offices. This will be a two-storey structure steel frame construction with suitable cladding and profiled roof. Aesthetically the building will be in keeping with the adjacent structures and the ATC tower.
- 3.20 Indicative visuals of the ATC Tower are provided in Chapter 3 of the ES. The final tower design will be developed at detailed design stage to suit the design aesthetic of the site. The annex will be a two storey structure. Options for construction of the tower could include steel frame or slip formed concrete.
- 3.21 The former approach lights within the airport boundary have been removed and require replacement. Outside the airport boundary the approach lights remain and at this stage it is anticipated that these would not require replacing, accepting that additional approach lights would be required to meet the requirements for CAT II/III operations, but existing lights will be reused where possible.
- 3.22 The existing airfield ground lighting (AGL), located within the runway and taxiway surface will be replaced and additional lights installed on the new taxiways to comply with appropriate requirements – see drawing numbers NK018417 RPS-MSE-XX-DR-C-2095 and NK018417 RPS-MSE-XX-DR-C-2096.

Air Freight and Cargo Facilities

- 3.23 The main operational role of the re-opened airport is to facilitate air freight movements. To meet the anticipated demand from the airfreight forecast, new cargo facilities will be required – see drawing numbers NK018417 RPS-MSE-XX-DR-C-2001, NK018417 RPS-MSE-XX-DR-C-2060, NK018417 RPS-MSE-XX-DR-C-2063 and NK018417 RPS-MSE-XX-DR-C-2085.
- 3.24 The cargo facilities, which will be constructed on the new building platform to be created for the taxiways and stands, would be constructed in phases to meet the demand and requirements of the air freight forecast.
- 3.25 Each cargo facility will have associated Heavy Goods vehicle (HGV) parking, storage and car parking. The facilities will cover approximately 65,500m² in total, with maximum building heights of 20m above ground level (agl) and used for the airside/landside management of cargo. The units will have a landside and airside frontage. A total storage and parking area of approximately 120,000m² will be provided. This will include a yard area for goods access with HGV dock levellers and includes

space for parking of goods vehicles. Office space will be accommodated within this frontage with associated staff parking.

- 3.26 The airside elevation looks directly south onto an access road with adjacent aircraft stands. The airside frontage will have a mixture of industrial access doors and windows. This airside frontage is facing away from the nearest residential areas further reducing the noise and visual impact.
- 3.27 The principles for the visual appearance of the development will be to achieve site-wide consistency with a contemporary and light industrial aesthetic. External wall finishes will be tailored to suit the end user requirements but a typical construction methodology would be for a steel portal framed building. Coloured cladding could be used to signify key areas, for example, office units or the division between facilities. Conceptual visualisations of the cargo facility are included in the Design and Access Statement [document reference TR020002/APP/7.3].
- 3.28 The existing cargo facilities located in the north east of the site would be retained during Construction Phase 1 and used for airport operational buildings i.e. vehicle storage, as well as equipment, storage, laydown and working areas. These buildings would be demolished during Construction Phase 3 in order to accommodate the new cargo facilities that would be built during this phase.

Passenger Terminal and Parking Facilities

- 3.29 It is anticipated that there will be passenger services from Year 3 of the airport's operation – see drawing numbers NK018417 RPS-MSE-XX-DR-C-2060, NK018417 RPS-MSE-XX-DR-C-2064, and NK018417 RPS-MSE-XX-DR-C-2083.
- 3.30 The existing terminal building is in a poor state of repair. A new terminal building and its associated ancillary facilities will replace the existing terminal, which will be demolished in Construction Phase 1. The new terminal would be located on the site of the existing terminal, and would be designed with sufficient capacity to meet the demands of the future passenger forecast. Indicative designs of the new terminal building have been provided.
- 3.31 The initial terminal will provide airside/landside access and will be served by three refurbished Code C aircraft stands. A later expansion of the building and addition of a fourth passenger stand will accommodate the demands of the passenger forecast.
- 3.32 On the landside frontage, the existing surface car park will be extended. A new internal highway network, including a one-way system, will be constructed to provide taxi, bus and pickup facilities for passengers. Strategic placement of bollards and hard areas will be provided to create a 30m clear area in front of the terminal building to comply with security regulations.
- 3.33 The terminal building will have a maximum elevation of 15m above ground level. The initial footprint will be 2,200m² with the ability to increase to 4,500m² to meet growth demands. The approximate dimensions of the initial footprint will be 75m x 30m.
- 3.34 Structurally, the building will comprise a steel frame with cladding and appropriate glazing. Architecturally the building will be consistent with the cargo buildings.
- 3.35 The existing terminal car park, which provides approximately 860 spaces, would be extended to provide parking for a total of 1,815 spaces for passenger spaces and 842 spaces for staff (see

Appendix N of the TA). The carpark area would be divided up to include staff and long stay parking. The construction will comprise of asphalt, concrete and granular material. The layout will include pedestrian walkway, trolley bays and pay on foot machines. Signed access will be provided from the car park to the terminal building. Land is already available adjacent to the existing car park having been set aside for a previous airport masterplan proposal. Some general maintenance and new access/exit barriers would be needed to the existing car park. Parking facilities to the west of the site entrance from the B2050 (Manston Road) would provide staff parking.

- 3.36 The car park would also include new areas for taxi ranks, drop off/pick up, buses and coaches; the number of spaces for these modes of transport is detailed in the Transport Assessment (Volume 14).

Fuel Farm

- 3.37 The airport will require a new fuel farm facility to replace the existing facility, which is located on the Northern Grass area and does not include sufficient storage or other facilities to meet the Proposed Development's needs. The new fuel farm will need to be located airside (i.e. not on the Northern Grass area) for operational reasons. This will allow for the safe and efficient transport and delivery of fuel around the site. At present, it is assumed that fuel would be delivered to the airport via road tanker, however the viability of alternatives, such as delivery via rail will be investigated as potential longer-term options.
- 3.38 The preferred location for the new fuel farm is in the south-east of the airport, on the site of the existing Jentex fuel facility – see drawing numbers NK018417 RPS-MSE-XX-DR-C-2093 and NK018417 RPS-MSE-XX-DR-C-2094. Currently, this is an independently operated fuel facility, however historically it was part of the airport site, and was the main fuel farm for the RAF airbase. Whilst the fuel farm would use the existing site, new tanks and associated infrastructure would be required to meet the needs of the Proposed Development, and to ensure that the facility is adequately designed and fit for purpose.
- 3.39 Prior to construction, decommissioning of existing tanks and infrastructure is required, alongside remediation of contaminated land, as deemed necessary. A number of old tanks have already been decommissioned.
- 3.40 The new fuel farm facility will be designed and constructed using best available techniques and will incorporate features such as above ground double skinned and bunded fuel tanks.
- 3.41 The new facility would also incorporate suitable protection and other measures to control and mitigate any risks to nearby residential and other property from an incident at the fuel farm. The design of these measures will be discussed and agreed with the Health and Safety Executive (HSE).
- 3.42 The 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.
- 3.43 It is expected that a minimum of three 700,000l cylindrical fuel tanks will be required to meet the expected fuel farm requirements. An additional tank has been allowed for to accommodate lighter aircraft fuel used for general aviation aircraft.

- 3.44 The existing buildings will be retained and refurbished as part of the development area where possible. The total building quantum, not including the tank or tank bunds, will be approximately equal in height and floor area of the existing buildings.
- 3.45 For ease of access, the facility will have a separate access road from the local road network, and will utilise an existing but improved access from Canterbury Road West. A new airside/landside security facility would be installed in the location of the existing 'emergency access gate' adjacent to the Jentex facility to provide direct airside access for the fuel farm.
- 3.46 The EA and Southern Water (SW) have been consulted on several occasions throughout the development and the principles surrounding the design of the fuel farm have been agreed. Both the EA and SW will continue to be consulted on the design of the fuel farm facility, and on the scope of any site investigations and remediation, that may be required.

Site Access, Highway and Junction Improvements

- 3.47 Roads in the vicinity of the Proposed Development, including B2050 (Manston Road), B2190 (Spitfire Way) and the Manston Road/Spitfire Way junction, have been identified as requiring improvement. Kent County Council (KCC) Highways Department has in place proposals to improve the public highway in this area as part of its Thanet Transport Strategy. Work will be undertaken in conjunction with KCC to provide improvements, which will require a signalised junction at the Manston Road/Spitfire Way junction, and other improvements to the local road network in the vicinity of the site.
- 3.48 A new airport access for the cargo/aircraft maintenance facility is proposed on the B2190 (Spitfire Way) to the west of the existing access. This will be designed with sufficient capacity for the Proposed Development's operations. Current proposals include a new roundabout to provide access to the airport. The detailed design of this and other highways/junction improvements will be undertaken following consultation with KCC Highway Department and Highways England.
- 3.49 A new network of internal roads for the air freight and cargo operations will also be constructed, inclusive of parking facilities for vehicles involved in air freight operations. These facilitate the internal movement of all vehicles, ground service equipment and staff working in the air freight services, and minimise the number of movements on the public road network. Suitable security, customs and border check point facilities would be constructed at the site access points and at cargo building facilities.
- 3.50 A landscaping zone between new internal access roads and the local road network, and along the boundary with B2190 (Spitfire Way) and B2050 (Manston Road) will be provided. The landscaping scheme will be designed so that is acceptable within the constraints of the aviation environment.
- 3.51 A Preliminary Construction Traffic Management Plan (PCTMP), Car Park Management Plan, Travel Plan, Airport Surface Access Strategy and Public Rights of Way Management Strategy (PRoWMS) have been developed as part of the TA; these will identify suitable embedded measures which should be incorporated into the design of the Proposed Development. The new elements to be considered as part of this are likely to include:
- Offsite junction improvements;

- Improvements to the core route along Spitfire Way and Manston Road from the A299 including road widening;
- Increased and enhanced facilities for taxis, buses and coaches for passengers and staff;
- Management of construction traffic vehicles
- Diversions for any road closures required to construction highways infrastructure and accesses;
- Closure and diversion of local PRow;
- Provision of a shuttle service to Ramsgate rail station;
- A network of internal footpaths and cycle paths for staff use;
- Upgrade and/or enhancement of existing pedestrian and cycle provisions within the vicinity of the Site; and
- Amended public service bus stops, and public bus service frequency and route changes (to be agreed with the local authority and bus route operators).

Outline Drainage Strategy

- 3.52 The surface water network would include interception, attenuation (winter and summer ponds) and pollution control facilities designed in accordance with industry best practice and agreed with the key stakeholders. Where appropriate this will utilise Sustainable Drainage Systems (SUDS) for the discharge to ground, existing connections to the public drainage system, or permitted discharge to Pegwell Bay. The outline Drainage Strategy is discussed further below.
- 3.53 The site is situated on an existing aquifer with a chalk subgrade a surface runoff for the site will ultimately discharge into Pegwell Bay, therefore drainage and surface water treatment has been a priority in development of the drainage strategy.
- 3.54 The outline drainage strategy for the site is to provide positive drainage following the site's natural contours, discharging into two adjacent attenuation ponds. Apart from providing attenuation, the ponds will also provide pollution control facilities. These ponds are located in the northern landside area at the natural site low point. Prior to discharging into the ponds, the water would flow through interceptors (existing and new). The first of these attenuation ponds would treat contaminated runoff through the use of mechanical aerators, before discharging into the second pond. Flow into the 'clean' pond would be limited; the spillway will have a storage capacity of greater than a 1 in 30-year flood event. From the second pond, the clean water will be conveyed towards the existing pumping station to be discharged from site.
- 3.55 Contaminated water is considered to be any runoff from the airfield or vehicle pavements. This includes roads, taxiways, yard areas and airfield aprons (i.e. de-icer and oil susceptible areas). 'Clean' runoff (i.e. from roof areas) may discharge into the second pond directly.
- 3.56 The location of the ponds is approximately 850m from the runway centreline and allows the ponds to be developed into a potential aesthetically attraction. An assessment will be undertaken during the detailed design stage to determine if further bird mitigation is required.

- 3.57 From the attenuation ponds, clean or treated water will be pumped around the site to be discharged into Pegwell Bay via the existing discharge outfall; this runs from the airport site to a discharge point within the former Ramsgate Hoverport site – see drawing number NK018417 RPS-MSE-XX-DR-C-2091. The first part of this system requires the pumping of water, but from the edge of the airport boundary the outfall is positive, i.e. gravity fed flow, following the natural land contours.
- 3.58 A survey of the existing storm drainage pipe has been conducted from the Proposed Development boundary to the Pegwell Bay outfall. The pipe was found to be in good repair and of a size expected to be sufficient to meet the site's discharge requirements.
- 3.59 Should the existing pumping system be unable to accommodate the proposed drainage volumes, two alternative options are available. The first is an upgrade to the existing pumping system, while the second is an alternative pump system which could follow the eastern site boundary before connecting to the existing outfall into Pegwell Bay. The detailed design of the drainage, including of the pumping system, will be completed following receipt of consent for the Proposed Development, if granted.
- 3.60 Ongoing consultation with the EA and Southern Water is informing the drainage strategy and design. An application for a new environmental permit to discharge may be made to the EA following the detailed design of the drainage strategy following DCO consent.

Outline Lighting Strategy

Airport Lighting

- 3.61 The scheme 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.
- 3.62 The luminaires use high efficiently low energy light-emitting diode (LED) lamps and the luminaires are designed to shine their light down, and by carefully controlling cut off angles the luminaires minimise any upward light pollution to less than 2.5% of luminaire flux for the total installation that goes directly into the sky. Lighting levels are minimised with higher lighting levels only used where they are needed to comply with the minimum recommend lighting standards such as for the airport aprons.

Business Park Lighting (Northern Grass)

- 3.63 The scheme 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.
- 3.64 The luminaires use high efficiently low energy LED lamps and the luminaires are designed to shine their light down, and by carefully controlling cut off angles the luminaires minimise any upward light

pollution to less than 2.5% of luminaire flux for the total installation that goes directly into the sky. The lighting design will meet a boundary condition of a maximum of 1 Lux in order to avoid any obtrusive light into adjoining properties.

Airport Fire Safety

- 3.65 The Proposed Development will require the provision of suitable firefighting facilities in order to meet its operational, safety and regulatory needs. The detailed design will consider the specific regulatory and end user requirements, but the preliminary design has identified the following areas that need to be considered:

- Airside fire facilities;
- Public firefighting team requirements; and
- Internal building fire suppression systems.

Airside Fire Facilities

- 3.66 The airport will require new airside firefighting facilities to meet the increased level of airport operations and activities. The existing fire station, which can accommodate four fire tenders and has associated offices, welfare facilities and an observation tower, will be replaced with a new facility constructed in the same approximate location. This facility will be larger than the existing facility, in order to incorporate the required number and size of fire tenders – see drawing number NK018417 RPS-MSE-XX-DR-C-2080.
- 3.67 The proposed structure will comprise two distinct elements, an area for vehicle maintenance and storage plus welfare and offices for staff. The building footprint is expected to be approximately 1,550m² with a building height of approximately 10m. The estimated roof level will be approximately 60m AOD. It will comprise a steel framed structure with concrete floor and wall cladding. Building aesthetics will be in keeping with the new airfield developments.
- 3.68 The aim of this facility is to provide on-shift accommodation for the airfield fire team which is adjacent to the equipment and vehicles. It also allows rapid access to the runway in order to meet the required emergency response times, plus access to the aircraft stands and buildings.
- 3.69 The structure will be capable of accommodating over 15 operatives at any one time with space for offices and personal storage for a total of 60 staff.
- 3.70 The garage has front and rear access doors to allow for 'drive through' parking. This avoids potentially dangerous reversing operations. The front elevation of the building is aligned perpendicular to the runway orientation to provide the required rapid response. Additional space has been allocated in the building for ancillary operational vehicles i.e a bird scaring vehicle.
- 3.71 The existing Emergency Water System (EWS) tanks, of which there are two; each with a posted volume of 45,000L, would be reused. An assessment of their condition will be undertaken and if required new tanks installed using best available techniques.
- 3.72 The regulatory training of airport firefighting personnel will be undertaken off site at approved facilities. This means that an on-site fire training ground will not be required.

Public Firefighting Team Requirements

- 3.73 As part of the detailed design process, fire hydrant locations would be provided around the perimeter of the cargo, terminal and hangar buildings. These buildings would also require potable water connections as part of their general use so provision of these hydrants would utilise this supply.

Internal Building Fire Suppression Systems

- 3.74 As a minimum, a mains-fed sprinkler system will be required in each new cargo facility. Additional or improved facilities may be required depending on end user requirements and the type of operations occurring. These could include, for example, chemical additives to the water supply providing increased fire suppression if a large quantity of plastics is being stored in a facility.
- 3.75 For the proposed new hangar facilities, bespoke fire systems may need to be designed and installed.

Northern Grass

- 3.76 The Northern Grass area will accommodate infrastructure critical to the running of the airport including airport related businesses which do not require an airside location. Additional areas are safeguarded for the continuing use of the existing museums and the retention of the existing memorial garden.
- 3.77 The Northern Grass will comprise multiple business units of various sizes and layouts with a total floor space of 105,100m². Two new accesses would be provided from B2050 (Manston Road) to this 'Northern Grass' area, and a new internal highway network created. Loading and turning areas for HGVs, sufficient staff and visitor parking, including disabled parking, to meet the relevant design standards, and associated pedestrian and cycle infrastructure will all be provided – see drawing number NK018417 RPS-MSE-XX-DR-C-2089. A new radar will be required to replace the previous radar which was sold when the airport closed. The new radar would be installed using the existing radar tower located in the Northern Grass area or a new tower and radar installed at the same location. An area around the radar has been safeguarded to allow safe operation.
- 3.78 The development will comprise the following key elements:
- A Business Park consisting of B1 and B8 units accommodating airport related businesses. These will be zoned in accordance with DCO submission drawing no. NK018417 RPS-MSE-XX-DR-C-2089. The sum of the new B1 and B8 building footprints within the Northern Grass area will not exceed 105,100m² with a 25/75 split of B1 and B8 development;
 - Highways infrastructure to provide access to facilities within the business park area;
 - Areas of planting, bunding or other screening to the outer areas of the site acting as visual and noise mitigation to adjacent residential receptors;
 - The Manston airfield radar tower and associated infrastructure, including an area safeguarded for safe operations of the radar facility;
 - Attenuation ponds and related drainage infrastructure; and

- An area safeguarded for continued operation of the RAF and Spitfire & Hurricane Museums, plus memorial ground.
- 3.79 A selection of B1 and B8 airport related businesses will be located on the Northern Grass area within a new business park comprising Zones 1, 2 and 3 with a 'buffer zone' to provide visual screening. The exact footprint and orientation of each business unit will be tailored to meet end user requirements. A zonal development approach has been taken with each zone adopting design parameters for maximum building heights and total building footprint.
- 3.80 Typically the buildings will be steel framed structures with panel cladding. Some buildings will include roller shutter doors. Small and medium sized office units may be developed as brick and block structures. Office annexes and individual office buildings will be sympathetically designed in either brick or suitable aesthetic cladding. It is envisaged that roofs will be predominately flat or of low pitch to mitigate visual impact.
- 3.81 The overall footprint for new B1 and B8 units has a maximum footprint of development broken down for each zone. It is intended that the negative impact of larger buildings can be offset with increased areas of non-building use, landscaping and open space, by using a restricted footprint approach. The maximum footprint of buildings within each area will be as follows:
- Zone 1: <30,000m² of B1 building development;
 - Zone 2: <60,000m² of B1/B8 building development;
 - Zone 3: <26,000m² of B8 building development; and
 - Total: <105,100m² of B1/B8 building development.
- 3.82 Maximum building heights above finished ground level have also been defined within each zone as follows:
- Zone 1: <16m; and
 - Zone 2 and Zone 3: <18m.
- 3.83 A more detailed description of each zone is given below:
- Zone 1 – This is the building zone considered to be of highest sensitivity to residential receptors. Buildings in this area will be limited in height to a maximum of 16m above finished ground level, which is comparable to a building height of approximately 2-3 storeys. Buildings will be limited to usage class B1.
 - Zone 2 – This area is considered to be less sensitive from the perspective of residential receptors. Buildings will be either B1 or B8 usage class and limited in height to a maximum of 18m above finished ground level.
 - Zone 3 – This area is considered to have the least sensitivity to local residential receptors. B8 development will be prioritised in this area with a maximum building height of 18m above finished ground level.

- **Buffer Zone** – This comprises a 45m strip along the east and north-west boundaries of the Northern Grass area. No industrial buildings will be constructed within this strip and use will be limited to landscaping, visual screening, retention of existing accesses and ground level pavement. It is accepted that some services infrastructure may be required in this area such as substations and hydrants. Some existing pavement infrastructure will also be retained to provide access to the rear of housing on Manston Road.
- **Internal Highways** – The highways network will be a single carriageway estate road with a 30mph speed limit designed to accommodate both light vehicles and HGV traffic with street lighting to adoptable standards. Two accesses have been provided onto the local highways network. The western access will be from Manston Road and the southern access will be from the B2050 Manston Road. A pedestrian footpath will be provided and constructed in accordance with KCC standard details so that it can be adopted into the highway network.

Other Development

- 3.84 In addition to the core business of air freight, and the complimentary passenger services, Manston Airport would also serve as a base for a number of other airport related services. These are outlined below with full details being provided in the Design and Access Statement

Museums

- 3.85 The RAF Manston Museum and the Spitfire and Hurricane Memorial Museum will remain on site, with an area of land being safeguarded for these facilities. It is intended that these museums will be retained and continue to operate on the site. In support of this, a substantial area (30,000m²) encompassing the existing building locations has been safeguarded within the masterplan. The safeguarded area for the Spitfire and Hurricane Museum encompasses the Allied Air Forces Memorial Garden. The intention is that this is fully retained and protected as part of the site development.

Aircraft maintenance/Recycling Facilities

- 3.86 A new maintenance and recycling facility will be constructed to the east of the site. Conceptual visualisations are included in the Design and Access Statement [document reference TR020002/APP/7.3]. The facility will consist of hangar buildings and associated offices. Aircraft access will be via the existing taxiway and new apron areas in front of the hangars. Aircraft recycling will take place within the enclosed hangar. The height of the hangars will be typically 20m to building eaves and 23m to peak. Preliminary design modelling for the site suggests the building heights would have a finished level of 73m AOD. The footprint of the buildings will be 10,215m² including the offices. An office annex will be included on the landside frontage of the building with an associated car park. The offices will be two or three stories in total and maybe housed partially within the main body of the hangar. The primary use of this office space is to provide business and management areas. The existing Maintenance Repair and Overhaul (MRO) hangar, which is located to the south of the terminal building, will be retained for use during the initial years of operation. A new MRO facility, with hangars would be constructed in Construction Phase 2; the old hangar would be demolished at this stage. The MRO and recycling facility would be further extended in each of Construction Phases 3 and 4 to provide an additional hangar and associated apron in each phase – drawing number NK018417 RPS-MSE-XX-DR-C-2081.

Fixed Base Operations

- 3.87 The current business aviation terminal and hangar, south of the passenger terminal, would be refurbished for use for Fixed Base Operations (FBO). This will be incorporated into a new area for accommodating for light aircraft, business jets and helicopter stands. These operations are located south of the aircraft maintenance and recycling facilities and towards the eastern end of the runway.
- 3.88 The proposed facility could include eight light aircraft hangars of approximately 800m², two helipads and the FBO building. The maximum height of construction within this area is 15m due to proximity of the runway and the requirements of the Obstacle Limitation Surface (OLS). Aircraft access will be provided via new taxiways links from the existing parallel taxiway.
- 3.89 There are several design options for construction of the hangars; these could be the traditional steel frame hangar building or 'fabric' type hangar on a steel frame.
- 3.90 Access for passengers and public will be from the internal road network.

Utilities, Services and Use of Resources

- 3.91 In order to support the increased level of activity and development on the site additional services will be required. This is likely to include additional internal electrical substations, communication networks, and foul and potable water connections. A utility strategy has been developed in order to determine the requirements of the airport for each phase of operation and construction and will be completed in order to inform the final design of the Proposed Development for the DCO; the detailed design will be finalised following the completion of this strategy.
- 3.92 An assessment of the further load requirements has been prepared as part of the utility strategy; an initial assessment indicates that it is unlikely that an increase to the internal or external network will be required.
- 3.93 A new foul drainage network will be required for the new cargo facilities. This is currently being assessed within the utility strategy, which will take into account the removal of the existing foul drainage when the buildings along Spitfire Way are removed. Consultation with SW on the requirements of the Proposed Development have commenced, with a meeting and discussion held with SW as part of the consultation and stakeholder engagement. Following the completion of the utility strategy they will be further consulted on the requirements and suggested solutions.
- 3.94 The proposed requirement for potable water is also being assessed in the utility strategy. This is being undertaken in consultation with SW.

Waste

- 3.95 Best practice measures for the construction and operation of the Proposed Development are used to inform the implementation of a robust Construction Environmental Management Plan (CEMP) and Site Waste Management Plan (SWMP).
- 3.96 Waste material will be generated at all stages of the construction process. Construction waste will arise from the following key aspects of the Proposed Development:

- Demolition of existing buildings and infrastructure (including the ATC Tower; air freight facility, fire station, maintenance hangar and passenger terminal);
- Excavation and earthworks for preparation of foundations; and
- Construction of new buildings (ATC Tower; expanded cargo facilities, larger fire station, additional maintenance hangars and a new passenger terminal); runway refurbishment; asphalt pavement (access, storage and parking); concrete pavement (taxiway and aprons); and airport related business development (in the 'Northern Grass' area).

3.97 Indicative targets for the construction of the Proposed Development are to achieve an 87% diversion of waste from landfill, and 62% re-use of materials within the site.

3.98 Good practice segregation of waste will be followed during the construction phase of the development. Sufficient space should be allowed to allow segregation of demolition, construction and excavation wastes. However the location will be dependent on constraints in the working area of the site.

3.99 Following any grant of the DCO, RiverOak will develop a framework Waste Management Plan for the site that all occupiers will be expected to adopt as a condition of their tenancy. In broad terms, the airport itself as well as any occupiers of the Northern Grass area will be expected to manage waste in line with the waste hierarchy below.

- Minimise raw materials consumed and the volume of waste produced i.e. prevent creating waste;
- Re-use any waste produced, where practicable;
- Recycle waste, where reuse is not practicable;
- Recover waste, where feasible; and
- Dispose of any remaining waste streams in accordance with legislative requirements.

3.100 The provision of effective storage and segregation of waste materials at the site will be a key element to ensure waste is managed safely and efficiently to maximise the potential for reuse and recycling. With respect to the airport related business development, waste management may be organised by individual businesses.

b) Passenger and Freight Forecast

3.101 The proposals for development are classified as a NSIP by the Act because they anticipate a capacity for at least 10,000 air transport movements of cargo aircraft each year. From the forecasts predictions provided below (see Volume III of the Azimuth Associates report), it is predicted that the 10,000 capacity will be reached by Year 6. Air freight and cargo operations are planned to resume at the airport in Year 2 (2021) with passenger services expected to follow in Year 3 (2022). Table 3.1 contains information about the forecast figures:

Table 3.1 Forecast passenger and freight movement numbers (2019 to 2039)

Year	Freight Moves	PAX Moves	Total Moves	Inbound Tonnage	Outbound Tonnage	Total Tonnage	Passenger Numbers
Y1	0	0	0	0	0	0	0
Y2	5,252	0	5,252	39,865	56,687	96,553	0
Y3	5,804	4,932	10,736	47,335	61,218	108,553	662,768
Y4	9,700	5,024	14,724	76,326	90,765	167,092	679,868
Y5	9,936	5,064	15,000	81,455	92,286	173,741	686,672
Y6	10,144	6,702	16,846	85,832	95,604	181,436	965,295
Y7	10,872	6,754	17,626	92,357	100,551	192,908	975,591
Y8	11,184	6,754	17,938	96,979	103,694	200,673	975,591
Y9	11,392	6,754	18,146	98,585	104,660	203,245	975,591
Y10	11,600	6,754	18,354	102,609	109,742	212,351	975,591
Y11	12,064	6,966	19,030	107,592	114,785	222,377	1,011,587
Y12	12,547	7,186	19,733	114,034	120,473	234,508	1,049,022
Y13	13,048	7,416	20,464	118,691	125,999	244,690	1,087,954
Y14	13,570	7,654	21,224	125,949	131,039	256,989	1,128,444
Y15	14,113	7,902	22,015	133,064	137,515	270,579	1,170,553
Y16	14,678	8,160	22,837	140,889	143,015	283,904	1,214,347
Y17	15,265	8,428	23,693	146,524	150,070	296,594	1,259,892
Y18	15,875	8,707	24,582	156,271	156,073	312,344	1,307,259
Y19	16,510	8,997	25,507	162,522	162,316	324,838	1,356,521
Y20	17,171	9,298	26,469	171,949	168,809	340,758	1,407,753

c) Programme and Phasing

- 3.102 The expectation is that the DCO may be granted in Autumn 2019 and this timescale has been assumed when developing the construction/operational programme which is the basis for the ES assessment. Full details of the works to be completed in each construction phase of development (including earthworks) are provided in Chapter 3 of the ES.
- 3.103 The forecasting of the air freight and passenger movements for the airport, as discussed above, has been conducted across a 20 year period from the granting of the DCO. This section outlines the programme for construction and then operation of Manston Airport from over this 20-year period.
- 3.104 The main activities to be undertaken during Year 1 would be the construction activities required to return the airport to full operational use. There may be some limited airport services, for example helicopter and heli-charter services, flight school and training services, and fixed base of operation services; however these will be dependent on the level of work required to rehabilitate the runway and to construct other essential services and utilities.
- 3.105 The full reopening of the airport would therefore take place in Year 2, currently expected to be 2020. The first full year of freight operations is expected in Year 3 (2021). Passenger services are anticipated to start in Year 4, currently 2022.
- 3.106 Three further phases of construction, as described in more detail in Table 3.2 below, would then follow in Years 2-5 (Phase 2), Years 5-12 (Phase 3) and Years 12-18 (Phase 4). During these three phases of construction the airport would remain operational.

Table 3.2 Proposed Outline Project Programme and Phasing

Component	Start Date	End Date	Airport Year of Operation
DCO granted	Q3 2019	n/a	Year 1
Construction Phase 1	Q3 2019	Q4 2020	Years 1-2
Opening of the airport	Q4 2020	n/a	Year 2
First Full Year of Freight Operations	Q1 2021	Q4 2021	Year 3
Construction Phase 2	Q4 2020	2023	Years 2-5
Start of passenger services	Q1 2022	n/a	Year 4
Construction Phase 3	2023	2030	Years 5-12
Construction Phase 4	2030	2036	Years 12-18

- 3.107 Table 3.3 below summarises the construction phasing for the key elements of the development proposal in line with the forecast demands as set out above.

Table 3.3 Proposed Construction Phasing

	Phase 1	Phase 2	Phase 3	Phase 4	Total
Aircraft Stands	8 (cargo)	6 (cargo) 3 (passenger) 1 (recycling hangar)	2 (cargo) 1 (recycling hangar)	3 (cargo), 1 (passenger) 1 (recycling hangar)	19 (cargo), 4 (passenger) 3 (recycling hangars)
Cargo Facilities	12,000m ²	16,500m ²	14,000m ²	23,000m ²	65,500m ²
Non aircraft pavement (new and rehabilitated)	758,000m ²	95,000m ²	59,000m ²	72,500m ²	984,500m ²
Aircraft Pavement (new and rehabilitated)	394,000m ²	103,000m ²	43,500m ²	34,000m ²	574,500m ²

d) Airport Hours of Operation

- 3.108 It will be necessary for the airport to be staffed continuously. Airport operations staff will need to be available during both day and night periods and a permanent security presence in the airport control room is required. It is also anticipated that staff, including air traffic controllers, rescue staff and firefighting staff and security will be rostered on a 12 hour shift programme, with a week of four days on/three days off followed by three days on and four days off.
- 3.109 However, operating times of the airport and ATMs will be dependent on the anticipated air traffic, and the rostering of the staff will be flexible to meet this demand. As outlined above the normal operating hours, or 'daytime', will be 07.00 to 23.00, but with limited exceptions during a shoulder period from 06.00 to 07.00 for certain passenger flights departing to Europe or arriving from the United States of America. There could be flights during the night-time period which is from 23.00 to 07.00 but they will be restricted and based on 'quota counts', which are common at other UK airports, where aircraft are given an independently assessed score known as a quota count according to how noisy they are, and then a quota is imposed. Consequently, there is a control of the total amount of noise from aircraft rather than the total number of aircraft. Full details of the aircraft quota count restrictions are set out in the Noise Mitigation Plan [document reference TR020002/APP/2.4].

- 3.110 The remaining direct airport and other direct staff will be rostered according to the needs of the airport and the hours of operation. These are likely to be rostered evenly across the daytime hours of 07.00 to 23.00.
- 3.111 The airport administration staff, alongside staff based in the aviation related business units on the 'Northern Grass' area will work traditional working hours, typically 08.00 to 18.00.

e) Airport Staff

- 3.112 The estimated total number of direct, indirect and catalytic jobs by airport year of operation is shown in Table 3.4 below.

Table 3.4 Total proposed direct, indirect and catalytic jobs by airport year of operation

Year of Operation	Freight Tonnage	Passenger Numbers	Direct Jobs	Indirect/Induced Jobs	Catalytic Jobs	Total
Y1	0	0	116	0	0	116
Y2	96,553	0	856	1,592	0	2,398
Y3	108,553	662,768	1,551	2,791	6,203	10,545
Y4	167,092	679,868	2,085	3,753	8,341	14,179
Y5	173,741	686,672	2,150	3,870	8,601	14,621
Y6	181,436	965,295	2,466	4,438	9,862	16,766
Y7	192,908	975,591	2,576	4,638	10,306	17,520
Y8	200,673	975,591	2,645	4,762	10,581	17,988
Y9	203,245	975,591	2,668	4,803	10,673	18,143
Y10	212,351	975,591	2,749	4,948	10,996	18,693
Y11	222,377	1,011,587	2,812	5,062	11,249	19,124
Y12	234,508	1,049,022	2,890	5,202	11,561	19,653
Y13	244,690	1,087,954	2,947	5,305	11,789	20,042
Y14	256,989	1,128,444	3,018	5,432	12,072	20,522
Y15	270,579	1,170,553	3,094	5,570	12,378	21,042
Y16	283,904	1,214,347	3,164	5,695	12,656	21,515
Y17	296,594	1,259,892	3,224	5,802	12,894	21,920
Y18	312,344	1,307,259	3,301	5,942	13,205	22,448
Y19	324,838	1,356,521	3,349	6,029	13,397	22,775
Y20	340,758	1,407,753	3,417	6,151	13,668	23,235

- 3.113 The direct jobs would be in a range of positions. The full range of the types of direct airport jobs would include the following. The percentages provided suggest what proportion of jobs would be provided in each type of airport job as per the evidence provided in paragraph 5.1.8 of Volume IV of the Azimuth Report [document reference TR020002/APP/7.4]:

- airlines (28%);
- ground handling (14%);
- airport and Air Traffic Control (14%);
- retail and other in-terminal services (6%);
- airport security and passenger screening (6%);

- customs, immigration and government jobs (5%);
- ground transport (5%);
- food and beverage (8%);
- maintenance, Repair and Overhaul (6%); and
- other (7%).

3.114 Indirect jobs include those in the supply chain such as caterers, aviation fuel supply, travel agents, cleaners and maintenance contractors. Catalytic employment includes those jobs in organisations that are facilitated by the operation of the airport such as tourism and importers and exporters.

4 FORMULATING THE PROPOSALS

- 4.1 The proposals in the DCO application are based on an illustrative Masterplan [document reference: TR020002/APP/7.1] which has been developed by RPS and is submitted as one of the application documents. The Masterplan has been developed in line with a brief from RiverOak based on their requirements for the airport which includes retaining the existing runway and other key existing components found on the airfield.
- 4.2 A first principles approach to designing the Masterplan was to limit the environmental effects of construction and operation. The Masterplan has been refined to respond to comments made during the consultation exercises that have been undertaken including those made by statutory consultees. The Masterplan has been used as the basis for the Works Plans [document reference: TR020002/APP/4.4], the list of works in Schedule 1 of the DCO [document reference: TR020002/APP/2.1], and the description of works in Chapter 3 of the ES [document reference: TR020002/APP/5.2-1].
- 4.3 In preparing the Masterplan, RPS were guided by planning policy as well as environmental and operational considerations. National, regional and local level planning policies have been reviewed and where relevant, have informed the design stages. Key considerations that have also informed the design process have included the Government policies for sustainable development generally and sustainable aviation in particular.
- 4.4 Further explanation of the design approach taken by RPS in developing the Masterplan is set out in the Design and Access Statement [document reference: TR020002/APP/7.3].

a) The application of planning policies

- 4.5 In addition to the specific guidance set out in national aviation policy, planning policies at a national, regional and local level have enabled the following important themes to emerge to guide the content and layout of the proposals for development:
- Countryside protection and containment within the existing airport boundary
 - Clustering
 - Environment and sustainability

Countryside protection and containment within the airport boundary

- 4.6 Planning policies at a national and local level seek to reduce the impact of development on the open countryside but also to ensure that all development directly related to the airport is contained within the airport itself (see NPPF, Airport NPS, draft Aviation Strategy and Local Plan Policies EC2, EC4, EC5 and CC1). These policies have played an important part in the formulation of the airport masterplan.
- 4.7 Care has been taken to determine the likely scale of airport related development requirements and to accommodate these within the expanded airport boundary. The airport is expected to stimulate other development in the region but where those effects are not directly airport related, the

Masterplanning strategy has assumed that this will be located elsewhere. Accommodating directly related airport development within the airport boundary has the dual advantage of reducing unnecessary external airport trips consistent with policies that promote sustainable travel and ensuring that there would be no undue development pressure on surrounding settlements or the local countryside. This was a particular concern raised by Thanet District Council in the pre-application consultation which the Applicant has responded to in finalising the proposals for development.

- 4.8 In determining the appropriate quantum of supporting development including offices, employment floorspace and car parking, care has been taken to ensure that development directly related to or associated with the airport should be located within the new airport boundary in accordance with saved 2006 Thanet District Local Plan Policy EC4. The airport is in a countryside location and general employment or other development would not otherwise ordinarily be acceptable. Equally, however, it is important that the scale of development proposed for the airport is sufficient to ensure that unacceptable overspill impacts or pressures are not imposed on surrounding countryside.
- 4.9 Complementary to this approach is the strategy to contain the airport within existing boundaries where practical and to ensure that the expanded boundary is no larger than it needs to be to meet airport operational requirements. Importantly, the observance of planning policy has guided the development of a Masterplan solution which broadly retains the existing airport boundaries on all sides. The eastern and western boundaries of the airport have been principally informed by the airport's operational layout requirements with the existing drainage outfall to Pegwell Bay being retained as part of the site-wide drainage strategy. Close attention has been given to the detailed design of the airport boundary and its relationship with its immediate neighbours and those further afield. This approach is directly consistent with the policy encouragement in the adopted 2006 Thanet Local Plan to reduce impacts on the open countryside, to prevent coalescence of settlements and to plan as far as possible for development to be a good neighbour (Local Plan Policies CC1, CC5 and R1).
- 4.10 The newly proposed airport boundary has created an envelope within which all of the necessary development requirements (except for off-site highways improvements) can be met. In other words and importantly, whilst the airport boundary has not been driven by the specific needs for car parking, office development or employment floorspace, those development requirements can be nonetheless accommodated within the new boundary.

Clustering of development

- 4.11 A key component of the Masterplanning strategy has been to focus the more intensively occupied built environment in the centre of the airport for example the new air freight handling facilities and aircraft stands. 'Zones' make up the Masterplan and these clearly demonstrate how this approach has been taken. This central focus means that the principal buildings are away from the airport boundary, thereby reducing potential visual effects and minimising any impression of the coalescence of settlements, consistent with Local Plan policies. It also means that key facilities are located close to the main transport interchanges including the terminal building itself. This efficient and effective use of land accords directly with important principles of sustainability.
- 4.12 The proposals for development have been designed to increase access by modes of transport other than the car and planned positively to limit the use of the car in the interests of sustainability and to promote the efficient use of land. This approach is directly encouraged by NPPF policies.

Environment and Sustainability

4.13 A principal theme which has run throughout the development of the Masterplan has been the need to ensure that the scheme will be undertaken and delivered in an environmentally responsible way. This objective is consistent with Government policy set out in the NPPF. The Design and Access Statement examines this theme further but it is useful to identify some of these in this statement:

1. The Proposed Development has been fully informed by an assessment of the significance of environmental assets within the expanded airport boundary.
2. The reopened and redeveloped airport is planned to continue to enjoy a distinctive character, defined by the quality of its built form, as well as the relationship between that built form and the surrounding landscape.
3. Great importance is attached to ensuring that the expanded airport limits its impact on neighbouring settlements and countryside.
4. Detailed sustainability objectives and targets for the airport's development will be set out in a number of documents to be developed at the detailed design stage. Central to these objectives and targets will be a determination to ensure that the proposed airport development achieves efficiency in its consumption of energy and water and in its generation of waste (see Chapter 3 of the ES for more information).

b) Masterplan Design Principles

4.14 The design principles are set out in the Design and Access Statement and have been informed by the principles and criteria for good design for airports infrastructure as set out in Section 4 of the Airports NPS which advises on design as follows:

- Design as an integral consideration from the outset of a proposal;
- Visual appearance as an important factor in considering the scheme design, as well as functionality, fitness for purpose, sustainability and cost;
- Producing sustainable infrastructure sensitive to place, efficient in the use of natural resources and energy and matched by an appearance that demonstrates good aesthetics as far as possible;
- Eliminating or substantially mitigating the identified problems by improving operational conditions and simultaneously minimising adverse impacts;
- Mitigating any existing adverse impacts wherever possible, for example in relation to safety or the environment; and
- Sustains the improvements to operational efficiency for as many years as is practicable, taking into account capital cost, economics and environmental impacts.

4.15 The illustrative Masterplan has been developed closely with the technical consultant team to ensure that the project is sustainable and as aesthetically sensitive, durable, adaptable and resilient as it can reasonably be, having regard to regulatory and other constraints and including accounting for

natural hazards such as flooding. The Masterplan allows for the required security, customs and immigration measures.

- 4.16 The scheme takes into account both functionality, including fitness for purpose and sustainability, and aesthetics, including its contribution to the quality of the area in which it would be located. Good design principles are embedded into the proposals.
- 4.17 The Design and Access Statement explains how the design process was conducted and how the proposed design evolved as recommended in paragraph 4.35 of the Airports NPS.

c) Process for Selecting the Development Proposal and Alternatives

- 4.18 Chapter 2 (Section 2.3) of the ES [document reference TR020002/APP/5.2-1] sets out the reasonable alternatives for an air freight airport that were considered by the Applicants in line with The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 set out within Schedule 4, Part 2. In considering the reasonable alternatives, consideration has been given to the characteristics of an air freight airport and the information on the current airport capacity and constraints within the UK aviation sector.
- 4.19 The following options have been considered:
- 'Do Nothing' alternative: where the Proposed Development is not progressed;
 - Strategic alternatives for the Proposed Development; and
 - Alternative design/layout in the context of the design evolution.
- 4.20 The option to 'do nothing' will not help to meet the Government's aviation policy objectives especially as all six London airports will reach capacity by 2030. Sites within the UK capable of providing the facilities to meet the predicted air freight demand are limited and heavily constrained. Many sites that could have provided air freight capacity have been lost through redevelopment. To do nothing may result in the Manston Airport site being lost to the airport sector particularly given that there are development pressures to change its use. The 'do-nothing' option would result in a gradual deterioration of the existing infrastructure on the site – the implications of such decline are difficult to predict.
- 4.21 In terms of other strategic alternative locations for the Proposed Development, and for the following reasons, Manston Airport is considered to be the most viable choice for the location of a freight-focused airport in the south-east of England due to its size, location and lack of airspace constraints. Indeed, Indeed, the 2003 White Paper, The Future of Air Transport, acknowledged that Manston 'could play a valuable role in meeting local demand and could contribute to regional economic development' (Department for Transport, paragraph 11.99):
- Manston Airport is located outside of the Controlled Traffic Region (in terms of airspace) and flights approaching from the south and east, i.e. from Africa, or Europe, the Middle East and Asia, can save up to 45 minutes in flying time compared with other airports;
 - Manston Airport has an existing 2,748m long paved runway, which, with only minor alterations and new navigational aids and equipment would be able to obtain a Aerodrome Certificate from

the EASA to allow it to handle the larger classes of aircraft, that are used and operated by air freight carriers;

- As shown in the Masterplan and in Section 3.2 of the ES, Manston Airport has sufficient space for the construction of new air freight handling, storage and processing facilities, alongside the new aircraft stands and aprons. This would provide a significant advantage as it allows the freight handling, forwarding and integrating to be undertaken airside on the airport site, and minimises the need for the transfer of freight off the airport site for processing. In addition, it has sufficient space on the Northern Grass to accommodate the airport related businesses that can be seen occupying premises in and adjacent to the vast majority of UK and European airports together with the airports surveillance radar systems; and
- Whilst there are some constraints to the Proposed Development at Manston Airport, for example being located to the south-east of London with greater road journey times to the north and west of London and the centres along the M4 corridor than for example Heathrow, these are offset by the unique advantages of the proposals which include: an existing 2,748m paved runway; dedicated air freight stands, aprons, handling, storage and processing facilities; prioritisation of freight with quick turnaround and unloading time of aircraft; and availability and flexibility of slots - none of which are likely to be sustained by any of the other airports in the south of England.

- 4.22 Section 2.4 of Chapter 2 of the ES [document reference TR020002/APP/5.2-1] sets out what considerations have been taken for on-site alternatives for individual elements and components of the Proposed Development as part of the masterplanning process. This has been undertaken as part of the on-going project evolution. A number of alternative layouts, designs and configurations were considered for the air freight and cargo facilities. This included examining the number of aircraft stands, apron design, taxiway layout and configuration, and size, location and layout of the associated freight handling and parking facilities. Whilst these were constrained by the need to provide sufficient capacity to meet the demands of the air freight forecast and to allow for the safe and efficient operation of the airport, opportunities to incorporate environmental measures into the design of the Proposed Development have nonetheless been considered. Further information is provided in the Design and Access Statement [document reference: TR020002/APP/7.3].
- 4.23 Alternatives for the operating procedures of aircraft that will use the airport have been considered with a view to mitigating potential impacts whilst also ensuring that the safety of aircraft taking off and landing is not compromised (see Chapter 2, Section 2.5 of the ES).
- 4.24 Given that the development being proposed can only be located at the existing Manston Airport site in order to capitalise on the existing runway, and because of the strong planning and aviation policy support for retaining the site in aviation use, the alternative proposal to redevelop the site for a mixed-use settlement which is being promoted by SHP, does not represent a better alternative use of the site.

5 THE RELEVANT CONSENTING REGIME

a) The Planning Act 2008

- 5.1 The proposals to reopen Manston Airport are classified as a Nationally Significant Infrastructure Project (NSIP) by the Planning Act 2008 ('the Act') because they anticipate a capacity for at least 10,000 air transport movements (ATMs) of cargo aircraft each year.
- 5.2 As the Proposed Development is an NSIP, it therefore requires the grant of development consent by the making of a Development Consent Order (DCO). An application for development consent must be submitted to the Planning Inspectorate (PINS) and, where that development is 'Environmental Impact Assessment (EIA) Development' – as this project is – that application must be supported by an Environmental Statement (ES) reporting on the findings of the EIA process; as required by the Act, The Infrastructure Planning (Environmental Impact Assessment) Regulations 2009 and The Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009.
- 5.3 The Planning Act 2008 requires that in deciding DCO applications, regard must be had to any National Policy Statement (NPS) which has 'effect' in relation to development of the description to which the application relates (a "relevant national policy statement") (Section 104(2)).
- 5.4 On 26th June 2018, the Government designated the Airports NPS. The Airports NPS makes it clear that it only has 'effect' in relation to the delivery of additional airport capacity through the provision of a new north-west runway at Heathrow Airport, new terminal capacity between the new Northwest Runway and the existing Northern Runway at Heathrow Airport as well as the reconfiguration of terminal facilities in the area between the two existing runways at Heathrow Airport (paragraph 1.40). Paragraph 1.41 of the NPS makes it clear that the Airports NPS does not have 'effect' in relation to an application for development consent for an airport development (such as this DCO application) which does not comprise an application relating to the Heathrow Northwest Runway and proposals for new terminal capacity between the new Northwest Runway and the existing Northern Runway at Heathrow Airport and reconfiguration of terminal facilities in the area between the two existing runways at Heathrow Airport. Nevertheless, the Secretary of State considers that the contents of the Airports NPS will be only 'important and relevant' considerations in the determination of an airport development (such as this DCO application) particularly where it relates to London and the South-East of England – which this development does (Airports NPS paragraph 1.41).
- 5.5 Section 104 of the Planning Act 2008 deals with how DCO applications should be determined where national policy statements have 'effect'. Section 104(2) states that in deciding the application, the Secretary of State must have regard to:
- (a) any national policy statement which has effect in relation to development of the description to which the application relates (a "relevant national policy statement");
 - (aa) the appropriate marine policy documents (if any), determined in accordance with section 59 of the Marine and Coastal Access Act 2009;
 - (b) any local impact report (within the meaning given by section 60(3)) submitted to the Secretary of State before the deadline specified in a notice under section 60(2);

- (c) any matters prescribed in relation to development of the description to which the application relates; and
- (d) any other matters which the Secretary of State thinks are both important and relevant to the Secretary of State's decision.

5.6 Section 104(3) of the Planning Act 2008 states that the Secretary of State must decide the application in accordance with any relevant national policy statement, except to the extent that one or more of subsections (4) to (8) applies. These subsections do not apply in this instance.

5.7 Just because the Airports NPS has been designated, it does not directly cover airport development other than a new runway at Heathrow Airport and proposals for new terminal capacity between the new Northwest Runway and the existing Northern Runway at Heathrow Airport and reconfiguration of terminal facilities in the area between the two existing runways at Heathrow Airport. Consequently, Section 105 of the Planning Act 2008 is deemed to apply. This section deals with how DCO applications should be determined in the absence of a designated NPS. Section 105 (2) of the Act states that the Secretary of State must have regard to:

- a) any local impact report (within the meaning given by Section 60(3)) submitted to the Commission before the deadline specified in a notice under Section 60(2),
- b) any matters prescribed in relation to development of the description to which the application relates, and
- c) any other matters which the Secretary of State thinks are both important and relevant to the Secretary of State's decision.

5.8 The Local Impact Report (LIR) is a report in writing giving details of the likely impact of the proposed development on the authority's area (or any part of that area). The expectation is that the Planning Inspectorate will invite the host authorities (Thanet District Council and Kent County Council) plus the neighbouring authorities (Surrey County Council, East Sussex County Council, Dover District Council, Canterbury City Council, Medway Council, Thurrock Council, the London Borough of Bexley and the London Borough of Bromley) to submit a LIR. The Applicant did benefit from consultation responses from Thanet, Kent, Canterbury and Dover Councils following the June/July 2017 and January/February 2018 statutory consultations and are therefore aware of the principal likely impacts of the proposed development on the authorities' areas and these are considered in more detail against the relevant planning policies further in later sections of this statement along with other matters that relate to the type of development being proposed by the DCO application and their likely impacts. The Consultation Report [document reference TR020002/APP/6.1] provides further details of these consultation responses and where relevant, where the proposals for development have been amended as a result of comments made.

5.9 The Planning Act 2008 does not incorporate Section 38(6) of the Planning and Compulsory Purchase Act 2004 which provides the principle basis in law for the determination of planning applications namely that they must be determined in accordance with the Development Plan unless material considerations indicate to the contrary. The local Development Plan, therefore is not the starting point for the consideration of a DCO. Nevertheless, the strong policy support for the Proposed Development in the adopted Thanet Local Plan is likely to be both relevant and important.

b) The Airports National Policy Statement (NPS) – *New Runway Capacity and Infrastructure at Airports in the South East of England* (June 2018)

- 5.10 On 26th June 2018, the Government designated the Airports NPS which provides the primary basis for decision making on development consent applications for a Northwest Runway at Heathrow Airport but which is important and relevant to other airport developments especially those in London and the South-East.
- 5.11 The Government (paragraph 1.12) made it clear that the Airports NPS *“will be an important and relevant consideration in respect of applications for new runway capacity and other airport infrastructure in London and the South East of England.”*
- 5.12 The Airports NPS sets out in paragraph 1.13 the particular considerations relevant to a development consent application to which the Airports NPS relates.
- 5.13 Paragraph 1.14 specifically states that the Airports NPS sets out planning policy in relation to applications for **any** airport nationally significant infrastructure project in the South East of England, and its policies will be important and relevant for the examination by the Examining Authority, and decisions by the Secretary of State in relation to such applications. The use of the phrase ‘important and relevant’ confirms that, the NPS is only indirectly relevant to this project and Section 105 of the Planning Act 2008 applies to decision-making rather than Section 104.
- 5.14 The Airports NPS applies to schemes at Heathrow Airport. The Secretary of State’s policy in relation to other airport infrastructure in the South East of England is set out at paragraph 1.41 of the Airports NPS which states:
- “The Airports NPS does not have effect in relation to an application for development consent for an airport development not comprised in an application relating to the Heathrow Northwest Runway, and proposals for new terminal capacity located between the Northwest Runway at Heathrow Airport and the existing Northern Runway and reconfiguration of terminal facilities between the two existing runways at Heathrow Airport. Nevertheless, the Secretary of State considers that the contents of the Airports NPS will be both important and relevant considerations in the determination of such an application, particularly where it relates to London or the South East of England. Among the considerations that will be important and relevant are the findings in the Airports NPS as to the need for new airport capacity and that the preferred scheme is the most appropriate means of meeting that need.”**
- 5.15 Paragraph 1.38 confirms that the Airports NPS sets out Government policy on expanding airport capacity in the South East of England, in particular by developing a new Northwest Runway development at Heathrow but that other Government policy on airport capacity has been set out in the Aviation Policy Framework published in 2013. Consequently, the Airports NPS does not affect Government policy on wider aviation issues for which the 2013 Aviation Policy Framework and any subsequent policy statements still apply. Paragraph 1.39 of the Airports NPS confirms that having analysed the responses to the call for evidence on a new Aviation Strategy, The Government is supportive of airports beyond Heathrow making best use of their existing runways.
- 5.16 It is not entirely clear which parts of the NPS would be ‘important and relevant’ to non-Heathrow Northwest Runway DCOs. The next sections of this statement aim to capture which parts of the NPS are deemed to be ‘important and relevant’ to the determination of this DCO application.

- 5.17 Whilst the Airports NPS is still a relevant consideration for other applications for airports infrastructure in London and the South East of England such as this DCO application, it will not form the basis for determination of DCO applications as set out at Section 104(3) of the Planning Act 2008.
- 5.18 The fact that there is no directly applicable Airports NPS - because the Airports NPS applies to schemes at Heathrow Airport only - does not mean that an airport-related DCO application cannot be promoted. The absence of a directly applicable Airports NPS simply means that until up-to-date Government policy on aviation is published, the Aviation Policy Framework (March 2013) will remain Government policy until it publishes its new Aviation Strategy (paragraphs 1.38 and 1.42 of the Airports NPS). This was further confirmed in the recent appeal decision on the Lothian Shelf (718) Limited proposals at Manston Airport (see Appendix 4). However, this policy is generally considered to be out of date on matters relating to airport expansion in the South East since the conclusions of the Airports Commission's brief (July 2015) to find an effective and deliverable solution to increase aviation capacity in the South East as well as supporting the UK.
- 5.19 Consequently, the Secretary of State is not prevented from taking a decision on this DCO application and the Planning Act 2008 contains powers for the Secretary of State to take such a decision.
- 5.20 Unlike the regime for the granting of planning permission under the Town and Country Planning Act 1990, Paragraph 1.20 of the Airports NPS does fully recognise that there is no provision in the Planning Act 2008 for the making of an 'outline' application for development consent, followed by 'reserved matters' approval. This does not mean, however, that development cannot be phased so that particular parts are brought forward at different times, or that the details of a proposal cannot be reserved for determination later – as is proposed by this application. Guidance by the Department for Communities and Local Government (DCLG) recognises that development projects advanced through the development consent order process may be phased, but emphasises that every phase of the project contained in a development consent application must be considered in the application for the order and the order itself.

Relationship between the Airports NPS and the Aviation Policy Framework

- 5.21 Paragraphs 1.38 and 1.39 of the Airports NPS explain the position for the purposes of decision making. The NPS sets out Government policy on expanding airport capacity in the South East of England, in particular by developing a Northwest Runway at Heathrow Airport or through proposals for new terminal capacity located between the Northwest Runway at Heathrow Airport and the existing Northern Runway or reconfiguration of terminal facilities between the two existing runways at Heathrow Airport and any applications for this development at Heathrow will be considered under the Airports NPS.
- 5.22 Other Government policy on airport capacity has been set out in the Aviation Policy Framework, published in 2013. The Airports NPS does not affect Government policy on wider aviation issues, for which the 2013 Aviation Policy Framework and any subsequent policy statements still apply. Although service provided by Heathrow for freight is mentioned in the NPS, non-Heathrow freight aviation would be a 'wider aviation issue'.
- 5.23 The APF sets out Government's high-level objectives and policy on the impacts of aviation. Unlike the 2003 Air Transport White Paper which set out in detail which specific developments would be supported at particular airports across the UK, the APF does not do this. Instead, it sets out the

Government's objectives and principles to guide plans and decisions at the local and regional level, to the extent that it is relevant to that area.

- 5.24 The APF recognises that aviation benefits need to be balanced against its local impact. It reaffirms that the Government believes that aviation needs to grow, delivering the benefits essential to economic wellbeing, whilst respecting the environment and protecting quality of life but that the right balance needs to be struck to ensure that the UK's long-term economic prosperity is safeguarded. It therefore follows that a balanced view needs to be reached in making decisions on whether to support specific airport developments and that development which achieves the Government's aviation policy objectives should be strongly supported. The main APF objectives for aviation are set out in the next section of this report.
- 5.25 On 21 July 2017, the Government issued a call for evidence on a new Aviation Strategy (see the following section of this report). The Government stated that in light of the Airports Commission's findings on more intensive use of existing airports, it was minded to be supportive of all airports who wish to make best use of their existing runways, including those in the South East (with the exception of Heathrow, whose proposed expansion is addressed in the Airports NPS). However such airports would still need to submit an application (for planning permission or development consent) to the relevant authority, which would need to be judged on the application's individual merits. The Government's policy on this issue will continue to be considered in the context of developing its new Aviation Strategy, and in light of responses to the call for evidence. However it is firmly recognised that the Airports NPS specifically states in paragraph 1.39 that :

“Having analysed the responses to the Government's call for evidence on a new Aviation Strategy, the Government has confirmed that it is supportive of airports beyond Heathrow making best use of their existing runways. However, we recognise that the development of airports can have positive and negative impacts, including on noise levels. We consider that any proposals should be judged on their individual merits by the relevant planning authority, taking careful account of all relevant considerations, particularly economic and environmental impacts.”

- 5.26 It is not clear if the Aviation Strategy will cover other non-Heathrow airport infrastructure although this is the expectation. However, it is recognised that it will not have the primary status that a NPS has when it comes to decision-making.

c) Assessment Principles

- 5.27 The determination of this DCO application will be made in the absence of a directly applicable Airports NPS (Section 104(2) of the Planning Act 2008) in accordance with Section 105 of the Planning Act 2008. A decision on the application can be taken on this basis and needs to be taken by the Secretary of State who must have regard to any LIR submitted to the Planning Inspectorate; any matters prescribed in relation to development of the description to which the application relates, and any other matters which the Secretary of State thinks are both important and relevant to the Secretary of State's decision.
- 5.28 Furthermore, and in the absence of a relevant NPS, the primary policy basis for determining the DCO application is the Government's National Policy on Aviation as contained within the Aviation Policy Framework (March 2013).

5.29 The next sections of this statement consider those matters that are 'important and relevant' to the decision against the relevant planning policy framework.

6 THE GOVERNMENT'S AVIATION POLICY

- 6.1 This chapter sets out the aviation policy basis at national level for determination of the DCO application.

a) Context

- 6.2 The starting point and the primary policy basis for determining the DCO application should be the policy framework set out in the Airports NPS. However, as the Airports NPS only has effect in relation to the delivery of additional airport capacity through the provision of a Northwest Runway at Heathrow Airport, proposals for new terminal capacity located between the new Northwest Runway and the existing Northern Runway at Heathrow Airport, as well as the reconfiguration of terminal facilities in the area between the two existing runways at Heathrow Airport, and until up-to-date Government policy on airports is set out in the Government's new Aviation Strategy (assuming this to be the case), then the most up to date policy framework is set out in the Aviation Policy Framework (March 2013) (APF).
- 6.3 This is further confirmed by paragraph 33 of the NPPF which states that when planning for ports, airports and airfields that are not subject to a separate national policy statement, plans should take account of their growth and role in serving business, leisure, training and emergency service needs. Plans should take account of the NPPF as well as the principles set out in the relevant national policy statements and the Government Framework for UK Aviation which is set out in the APF. The Airports NPS states that it does not affect wider aviation issues '*for which the 2013 Aviation Policy Framework and any subsequent policy statements still apply*' (Paragraph 1.38).
- 6.4 This section of the Planning Statement contains a review of the Government's Framework for UK Aviation, namely the APF. It also identifies those elements of policy which may be particularly significant for the consideration of this DCO application and the tests which they set for the determination of the application. It demonstrates how the Proposed Development achieves the objectives of the Government's Framework for UK Aviation with reference to other documents submitted with the DCO.
- 6.5 Since publication of the APF, significant progress has been made by the Government on addressing matters relating specifically to airport expansion in the South East especially through the work of the Airports Commission. Consequently, the APF is considered to be out-of-date in relation to this particular matter and due consideration needs to be made to the conclusions and emerging guidance contained in the following documents insofar as they relate to airport expansion in the South East pursuant to Section 105(2) of the Planning Act 2008 which requires the Secretary of State to have regard to other matters that are important and relevant when making his decision:
- Airports Commission Interim Report (2013)
 - Airports Commission Final Report (2015)
 - National Infrastructure Delivery Plan (2016)

- Airports NPS (June 2018) (insofar as it relates to nationally significant airport infrastructure projects excluding the new Northwest Runway at Heathrow)
- *'Beyond the Horizon : The Future of Aviation in the UK'* (July 2017) – a consultation on the new Aviation Strategy White Paper (expected 2018) and the update reports produced by the Government following an analysis of the consultation responses

6.6 In this regard, the Airports NPS is a material consideration. Similarly, the information presented in the Government's July 2017 consultation on the new Aviation Strategy White Paper is material to any decision taken on this DCO application.

b) The Aviation Policy Framework (March 2013)

6.7 As set out in the preceding section, the Airports NPS does not affect Government policy on wider aviation issues, for which the 2013 Aviation Policy Framework and any subsequent policy statements still apply. This section sets out the Government's policy on wider aviation issues.

6.8 The Aviation Policy Framework (APF) has fully replaced the 2003 Air Transport White Paper as Government's national policy on aviation, alongside any decision the Government makes following the recommendation of the independent Airports Commission, and is therefore silent on specific policies either in support of or against further airport expansion in the South East. The Airports Commission was established in September 2012 with the remit of recommending how the UK can maintain its status as a global aviation hub and maintain our excellent international connectivity for generations to come, as well as making best use of our existing capacity in the shorter term.

6.9 In the absence of any specific commentary on regional airport expansion in the South East or Manston Airport itself, the Aviation Policy Framework does state that the Government recognises the very important role airports across the UK play in providing domestic and international connections and the vital contribution they can make to the growth of regional economies. It is acknowledged that for more remote parts of the UK, aviation is not a luxury, but provides vital connectivity. It states that many airports act as focal points for business development and employment by providing rapid delivery of products by air and convenient access to international markets and cites the success of East Midlands Airport which acts as a hub for freight. The Proposed Development will complement East Midlands Airport and other South East airports, strengthen connectivity and once again develop Manston Airport into a business and employment destination delivering a number of social and economic benefits.

6.10 In terms of air freight, the APF recognises its importance for supporting export-led growth in sectors where the goods are of high value or time critical. It goes on to state that air freight is a key element of the supply chain in the advanced manufacturing sector in which the UK is looking to build competitive strength. Goods worth £116 billion are shipped by air between the UK and non-EU countries, representing 35% of the UK's extra-EU trade by value. The express air freight sector alone contributed £2.3 billion to UK GDP in 2010, and facilitates £11 billion of UK exports a year. Over 38,000 people are directly employed in the express industry, which supports more than 43,000 jobs in other sectors of the economy. The APF further states that a successful and diverse economy will drive a need for quicker air freight. Key components to keep factories working are often brought in from specialist companies in North America and the Far East. To keep production lines rolling this often has to be done at short notice. Access to such services is crucial to keeping UK manufacturing

competitive in the global marketplace. The need for the Proposed Development is compelling as set out in the Azimuth Associates Report [document reference TR020002/APP/7.4].

- 6.11 The Aviation Policy Framework sets out Government's high-level objectives and policy on aviation. As a framework, it brings together many related and discrete policies and work streams.
- 6.12 The APF sets out the role of the planning system in the operation of small and medium-sized aerodromes. It states that the underlying planning principles in respect of airfields remain unaltered in the NPPF which states that (Paragraph 1.90):

“When planning for ports, airports and airfields that are not subject to a separate national policy statement, plans should take account of their growth and role in serving business, leisure, training and emergency service need. Plans should take account of this framework as well as the principles set out in the relevant national policy statements and the Government Framework for UK Aviation.”

- 6.13 By defining Government's objectives and policies on the impacts of aviation, the APF sets out the framework within which decisions on aviation ought to be made to deliver a balanced approach to securing the benefits of aviation and to support economic growth. The main objectives of the APF are summarised below:

- 1. **Support growth and the benefits of aviation** - to achieve long-term economic growth recognising that the aviation sector is a major contributor to the economy whose growth the Government supports; and to ensure that the UK's air links continue to make it one of the best connected countries in the world. This includes increasing our links to emerging markets so that the UK can compete successfully for economic growth opportunities. As set out in the Azimuth Associates Report [document reference TR020002/APP.7.4], the Proposed Development will help to achieve all these objectives thereby realising the significant economic benefits that the aviation sector brings to the UK on a regional and local basis.

- **Aviation's contribution to the UK economy**

Paragraph 1.1 recognises that with the increasing globalisation of our economy and society, the future of the UK will undoubtedly continue to be shaped by the effectiveness of its international transport networks. In light of Brexit, the Proposed Development will especially help to achieve this objective.

Paragraph 1.2 recognises that aviation infrastructure plays an important role in contributing to economic growth through the connectivity it helps deliver, for example, by providing better access to markets, enhancing communications and business interactions, facilitating trade and investment and improving business efficiency through time savings, reduced costs and improved reliability for business travellers and air freight operations. The Proposed Development will especially realise this objective.

Paragraph 1.3 confirms that there is broad agreement that aviation benefits the UK economy, both at a national and a regional level and that the economic benefits are significant, particularly those benefits resulting from the connectivity provided by aviation. Additionally, paragraph 1.3 states that there are social and cultural benefits from aviation.

These benefits are fully explored and confirmed in Volume IV the Azimuth Associates Report [document reference : TR020002/APP.7.4].

Gross domestic product and jobs – paragraph 1.4 recognises that the air transport sector's turnover is around £28 billion, and the sector directly generates around £10 billion of economic output. It provides about 120,000 jobs in the UK and supports many more indirectly. Paragraph 1.5 rightly recognises that the economic importance of the aviation sector extends beyond its direct contribution to UK Gross Domestic Product (GDP) and employment, as an enabler of activity in many other sectors of the economy. By Year 20, the Proposed Development will deliver approximately 3,400 direct jobs with approximately 6,100 indirect/induced jobs and approximately 13,650 catalytic jobs in the same period. The total GDP from direct, indirect/induced and catalytic jobs at Manston is forecast to be between £1.2 and £1.3 billion. This is a significant economic benefit.

Imports and Exports - paragraph 1.6 recognises that although air freight carries a small proportion of UK trade by weight, it is particularly important for supporting export-led growth in sectors where the goods are of high value or time critical. Paragraph 1.7 states that the express air freight sector alone contributed £2.3 billion to UK GDP in 2010, and facilitates £11 billion of UK exports a year. Over 38,000 people are directly employed in the express industry, which supports more than 43,000 jobs in other sectors of the economy. Paragraph 1.8 recognises that a successful and diverse economy will drive a need for quicker air freight and that access to such services is crucial to keeping UK manufacturing competitive in the global marketplace. The Proposed Development with its focus on providing air freight facilities will provide the UK but importantly, the South East with significant new and dedicated air freight facilities thereby enabling significant economic benefits to be realised and UK competitiveness to be improved.

Manufacturing, skills and technology – paragraph 1.9 recognises that the UK has the second largest aerospace manufacturing industry in the world and the largest in Europe and that the growth prospects for the UK industry are sizeable based on global traffic growth predictions (£352 billion revenue up to 2030). Paragraph 1.11 recognises that new and emerging technologies, such as unmanned aerial vehicles (UAVs), offer significant opportunities in the civil aviation field, for example in oil, and mineral exploration, air freight, search and rescue, data gathering and scientific research, as well as opportunities for technology transfer to the wider aviation sector.

Value of business and general aviation – paragraph 1.12 recognises that business and general aviation (GA) is important to the UK and that its contribution to the economy has been estimated at £1.4 billion per annum. The sector covers a wide range of activities. A Civil Aviation Authority (CAA)-initiated and chaired strategic review of the sector has acknowledged its growing economic importance, particularly for the British and European manufacturing industry. The Proposed Development recognises the importance of business and general aviation and includes hangars and facilities for this to the south of the passenger terminal and car park (see Masterplan document reference TR020002/APP/7.1).

Greater productivity and growth – paragraph 1.13 confirms that the UK's aviation sector enables productivity and growth in the following ways:

- enhanced access to markets and new business opportunities through improved connectivity;
- lower transport costs and quicker deliveries. For example, transporting freight by air allows smaller inventory holdings, and the rapid transport of perishable goods leads to increased specialisation of production which results in greater efficacies; and
- facilitating inward investment and the movement of goods, people and ideas both within the UK and to and from the rest of the world, thus enhancing trade and the diffusion of knowledge and innovation.

Some of the main benefits to consumers and businesses from greater investment and effective use of airport infrastructure include (paragraph 1.14):

- reductions in delays and disruption as a result of airport congestion, which affect airlines, passengers and the wider community; and
- increased frequency and range of flights to faster-growing economies.

The need case for the Proposed Development is underpinned by an ambition to realise all these key objectives and to unlock barriers in the current aviation sector which are restricting the Country's ability to fully profit from the associated benefits.

Tourism – paragraph 1.15 confirms that air travel is essential to the Government Tourism Policy. Good connectivity from the UK to emerging economies is likely to increase the scope for growth in inbound tourism in future. Earnings from overseas visits were £18 billion, 84% of which was spent by people who arrived by air. Paragraph 1.16 states that the Government believes that the chance to fly abroad also offers quality of life benefits including educational and skills development. Overall, continuing to make UK tourism more attractive is deemed to be a better approach both for residents and attracting new visitors. Volume IV of the Azimuth Associates Report [document reference TR020002/APP/7.4] considers the potential impact of the Proposed Development on Thanet and East Kent. It concludes that the airport would support tourism in the area and would increase demand for visitor accommodation (and the related jobs) across Thanet.

Travel, culture and family - in addition to its economic contribution, aviation provides wider social benefits, enabling UK citizens to experience different cultures or enjoy a well-earned holiday (paragraph 1.17). In an increasingly globalised society visiting friends and relatives is an increasingly important reason for flying. Visiting friends and relatives also forms a significant proportion of business for airports outside London and the South East, which in some cases helps maintains the viability of their air links. The passenger services that will be provided as part of the Proposed Development will assist to meet this objective.

- **Supporting airports across the UK**

The APF recognises the growth and importance of airports outside London in achieving the Government's aim of helping the economy to grow by encouraging investment and

exports as a route to a more balanced economy. Volume IV of the Azimuth Associates Report [document reference TR020002/APP/7.4] explains how the Proposed Development will boost prosperity and rebalance the economy especially in the Thanet and East Kent regions which demonstrate particular problems associated with deprivation and high levels of unemployment.

Paragraph 1.20 recognises that airports create local jobs and fuel opportunities for economic rebalancing in their wider region or area. New or more frequent international connections attract business activity, boosting the economy of the region and providing new opportunities and better access to new markets for existing businesses.

Paragraph 1.21 especially recognises the very important role airports across the UK play in providing domestic and international connections and the vital contribution they can make to the growth of regional economies.

Paragraph 1.22 acknowledges that airports act as focal points for business development and employment by providing rapid delivery of products by air and convenient access to international markets.

Paragraph 1.23 recognises that airports outside the South East of England also have an important role in helping to accommodate wider forecast growth in demand for aviation in the UK, which could help take some pressure off London's main airports. The availability of direct air services locally from these airports can also reduce the need for air passengers and freight to travel long distances to reach larger UK airports.

- **Connectivity**

Paragraph 1.36 repeats earlier messages that aviation significantly benefits the UK because it provides the UK with excellent access to the rest of the world and brings people closer together within the UK. With the increasing globalisation of the economy and society, the APF recognises that the future of the UK will undoubtedly continue to be shaped by the effectiveness of its international transport networks.

Paragraph 1.46 recognises that the UK's continued economic success depends on being able to connect with the countries and locations that are of most benefit to the UK economy. This is important in relation both to destinations that fall into that category today and those locations that will become crucial to the country's economic success in the future. While it remains vital for the UK to maintain its connectivity with established markets such as the USA and in Europe, it is also important that advantage is taken of the growing opportunities presented in the emerging economies of the world to remain competitive in the global economy.

Section 8 of Volume IV of the Azimuth Associates Report [document reference TR020002/APP/7.4] explains how the Proposed Development will boost connectivity. It recognises research by Intervistas in 2015 which has shown that a 10% increase in connectivity in air transport is associated with an increase in GDP per capita of 0.5%. The economic benefits of the Proposed Development in this sense alone are significant in addition to the role that Manston Airport will play in developing further global connections.

- **Aviation demand forecasts**

Paragraph 1.54 accepts that in the most likely scenarios, the major South East airports are forecast to be full by 2030. However, other scenarios have this occurring as soon as 2025 or as late as 2040, depending primarily on the rate of economic growth and the price of oil. In paragraph 1.55, the APF states that according to the most likely scenarios, a number of non-London airports, including Birmingham, Bristol, East Midlands and Manchester Airport, are also assessed as reaching capacity over a similar time scale. In paragraph 1.56, it is acknowledged that Heathrow had effectively reached its maximum capacity in 2011 and it is forecast to remain at full capacity across all the demand cases considered. Volume I of the Azimuth Associates Report [document reference TR020002/APP/7.4] considers airport demand in the South East of the UK and does not dispute these conclusions. Volume III of the same report sets out the forecasts for Manston Airport and concludes that even with a new runway at Heathrow, that the Proposed Development will make a substantial contribution

- **Strategy for a vibrant aviation sector: the short term and**

In the short term (to around 2020) the Government's key priority as set out in the APF is to continue to work with the aviation industry and other stakeholders to make better use of existing runways at all UK airports. The Government's strategy is to focus on making best use of existing capacity to improve performance, resilience and the passenger experience; encourage new routes and services; support airports outside the South East to grow and develop new routes; and better integrate airports into the wider transport network (paragraph 1.60). Additionally, the Government recognises the importance of maintaining access to a national network of aerodromes including regional aerodromes in England which it says is vital to the continuing success of the aviation sector (paragraph 1.86). The Proposed Development will see the best use being made of the existing runway at Manston bringing it back into valuable use and capitalising on the long and wide runway to fulfil many of the Government's objectives for the aviation sector.

- **Strategy for a vibrant aviation sector: the medium and long term.**

This is based in part on integrating airports in the wider transport network and especially, through considering options for enhancing rail services to major airports (paragraph 1.99). This includes developing a national high rail network (paragraph 1.100) where it is stated that the Government will ensure that its national strategies for aviation and high-speed rail are aligned, providing a better travel offer to the UK travelling public. East Kent is already well served by the High Speed 1 rail line into London. Kent County Council's plans to open a new station on this line (Thanet Parkway Station) will mean that Manston Airport's rail connection will be improved.

2. **Managing aviation's environmental impacts**

The Government's objective is to ensure that the aviation sector makes a significant and cost-effective contribution towards reducing global emissions (paragraph 2.4). The emphasis is on action at a global level as the best means of securing our objective, with action within Europe the next best option and a potential step towards wider international agreement (paragraph

2.5). At a national level, the Government states that it will also take unilateral action where that is appropriate and justified in terms of the balance between benefits and costs. Chapter 16 of the Environmental Statement [document reference TR020002/APP/5.2-2] assesses the likely impacts of the Proposed Development on Climate Change. No significant effects are expected. The Applicant is committed to developing and implementing Carbon Minimisation Action Plan.

The Government's policy approach to environmental effects and mitigation demonstrates that it expects environmental effects to arise from the developments that it supports. However, it does not anticipate that such effects would, in principle, represent obstacles to the grant of planning permission. Rather the policy indicates that local controls (and local policies) are to be applied to control, mitigate or compensate for the environmental effects. The ES submitted with this DCO application considers what mitigation (and compensation) is required following the environmental assessment of the Proposed Development. The Register of Environmental Actions and Commitments [document reference TR020002/APP/2.5] further confirms what commitments the Applicant is prepared to take to reduce the environmental effects of the Proposed Development.

Paragraph 2.60 confirms that the Government strongly supports the need to better understand and manage the risks associated with climate change because it is essential for the successful long-term resilience of the UK's aviation industry and its contribution to supporting economic growth and competitiveness.

3. **Noise and other local environmental impacts**

Paragraph 3.1 fully recognises that whilst the aviation industry brings significant benefits to the UK economy, there are costs associated with its local environmental impacts which are borne by those living around airports, some of whom may not use the airport or directly benefit from its operations – and that these include noise, air quality and other local environmental impacts.

Noise - The Government's overall policy on aviation noise is to limit and, where possible, reduce the number of people in the UK significantly affected by aircraft noise, as part of a policy of sharing benefits of noise reduction with industry (paragraph 3.12).

The Government will continue to ensure that noise exposure maps are produced for the noise-designated airports on an annual basis providing results down to a level of 57dB LAeq 16 hour (paragraph 3.15) and to improve monitoring of the specific impact of night noise, separate night noise contours for the eight-hour night period (11pm–7am) are to be produced for the designated airports. Paragraph 3.17 confirms that the Government will continue to treat the 57dB LAeq 16 hour contour as the average level of daytime aircraft noise marking the approximate onset of significant community annoyance. However, it is recognised that this does not mean that all people within this contour will experience significant adverse effects from aircraft noise, nor does it mean that no-one outside of this contour will consider themselves annoyed by aircraft noise. Noise Contour Maps have been produced in support of the DCO application. These are provided in document reference TR020002/APP/5.2-12.

Paragraph 3.24 fully accepts that the acceptability of any growth in aviation depends to a large extent on the industry tackling its noise impact. As a general principle, the Government expects

that at the local level, individual airports working with the appropriate air traffic service providers should give particular weight to the management and mitigation of noise, as opposed to other environmental impacts, in the immediate vicinity of airports (paragraph 3.25). In paragraph 3.26, the Government states its wish for airports to consider using the powers available to them to set suitable noise controls such as departure noise limits, minimum height requirements, noise-preferential routes and adherence to continuous descent approach, and where appropriate to enforce these with dissuasive and proportionate penalties and that both controls and the levels of penalties should be reviewed regularly in consultation with local communities and consultative committees, to ensure they remain effective. The DCO application includes a Noise Mitigation Plan [document reference TR020002/APP/2.4] which includes the controls and penalties that will be applied if flight operations deviate from the preferences that have been set specifically to mitigate against potential for noise impacts.

In terms of night noise, the Government recognises that the costs on local communities are higher from aircraft noise during the night, particularly the health costs associated with sleep disturbance (paragraph 3.34). Noise from aircraft at night is therefore widely regarded as the least acceptable aspect of aircraft operations. However, the Government also recognises the importance to the UK economy of certain types of flights, such as express freight services, which may only be viable if they operate at night. In paragraph 3.35, the Government sets out its expectation that the aviation industry should make extra efforts to reduce and mitigate noise from night flights through use of best-in-class aircraft, best practice operating procedures, seeking ways to provide respite wherever possible and minimising the demand for night flights where alternatives are available. The Noise Mitigation Plan [document reference TR020002/APP/2.4] sets out RiverOak's proposal for introducing an aircraft quota count restriction to limit night-time take-offs and landings in the interests of mitigating against night time noise from flights.

Noise insulation and compensation – in paragraph 3.36, the Government states that it continues to expect airport operators to offer households exposed to levels of noise of 69 dB LAeq,16h or more, assistance with the costs of moving. The Government also expects airport operators to offer acoustic insulation to noise-sensitive buildings, such as schools and hospitals, exposed to levels of noise of 63 dB LAeq,16h or more. Where acoustic insulation cannot provide an appropriate or cost-effective solution, alternative mitigation measures should be offered (paragraph 3.37). If no such schemes already exist, airport operators should consider financial assistance towards acoustic insulation for households (paragraph 3.38). The Noise Mitigation Plan [document reference TR020002/APP/2.4] sets out RiverOak's proposal for introducing a Noise Insulation Scheme for residential and noise-sensitive buildings where financial assistance towards acoustic insulation is offered to eligible properties within prescribed noise contours.

Air quality and other local environmental impacts – paragraph 3.46 acknowledges that airports have a significant impact on other aspects of the local environment including emissions from transport contributing to air pollution. The Government's policy on air quality is to seek improved international standards to reduce emissions from aircraft and vehicles and to work with airports and local authorities as appropriate to improve air quality, including encouraging HGV, bus and taxi operators to replace or retrofit with pollution-reducing technology older, more polluting vehicles (paragraph 3.48). Chapter 6 of the ES [document

reference TR020002/APP/5.2-1] considers the air quality impacts of the Proposed Development and concludes that no significant effects are expected after applying mitigation.

Loss of protected habitats, protected species, protected landscape and built heritage, and significant impacts on water resources and ecosystems would only be advocated if there were no feasible alternatives and the benefits of proposals clearly outweighed those impacts (paragraph 3.55). Any unavoidable impacts would be mitigated or compensated for. The Government's policy is to ensure there is full consideration of the environmental impacts of the most credible options for maintaining our international connectivity. These matters are considered in Chapters 7 (Biodiversity), 8 (Freshwater Environment), 9 (Historic Environment), 11 (Landscape and Visual) of the ES [document references TR020002/APP/5.2-1 and 2-2].

4. **Working together** - to encourage the aviation industry and local stakeholders to strengthen and streamline the way in which they work together. RiverOak are committed to setting up an Airport Consultative Committee which will include local stakeholders and interested bodies with a view to working together on matters concerning the airport.

- 6.14 There are other important high-level policy objectives. Although they are not the subject of the APF, they support and are consistent with it and are being taken forward separately. These objectives include protecting passenger rights, competition and regulation policy, airspace, safety and security.
- 6.15 Section 5 concerns Planning and explains the APF's status and its interaction with existing planning guidance and policies and any decisions following the recommendations of the Airports Commission. It applies to the whole of the UK.
- 6.16 Paragraph 5.5 states that should the Government decide to support any new nationally significant airport infrastructure following the conclusions of the Airports Commission's work, it is likely that the next step would be to draft and consult on a National Policy Statement (NPS) for Airports which would accelerate the resolution of any future planning application(s). The Government designated the Airports NPS in June 2018 (see below for further details).
- 6.17 In terms of planning policies, paragraph 5.6 states that in preparing their local plans, local authorities are required to have regard to policies and advice issued by the Secretary of State. This includes the APF, to the extent it is relevant to a particular local authority area, along with other relevant planning policy and guidance. The APF may be a material consideration in planning decisions depending on the circumstances of a particular application. It is considered that the APF is material to the decision on this DCO application.
- 6.18 In terms of safeguarding, paragraph 5.8 states that the National Planning Policy Framework (NPPF) makes clear that local planning authorities should 'identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen choice' and that this could apply to airport infrastructure. Paragraph 5.9 relates to land outside existing airports that may be required for airport development in the future and how this needs to be protected against incompatible development until the Government has established any relevant policies and proposals in response to the findings of the Airports Commission. The Manston Airport site, including the Northern Grass area, continues to be protected for airport related uses by saved policies in the adopted 2006 Thanet Local Plan. These policies remain up-to-date as confirmed by the Planning Inspector in his decision on the Lothian Shelf Limited appeals in July 2017 (see Appendix 4).

- 6.19 Paragraph 5.11 states that all proposals for airport development must be accompanied by clear surface access proposals which demonstrate how the airport will ensure easy and reliable access for passengers, increase the use of public transport by passengers to access the airport, and minimise congestion and other local impacts. This information is provided in the Transport Assessment submitted with the DCO application [document reference TR020002/APP/5.2-15].
- 6.20 Paragraphs 5.14 and 5.15 relate to Public Safety Zones (PSZs) which are areas where accidents are most likely to occur. The objective is to control the number of people at risk through the PSZ system. PSZs are areas of land at the ends of runways at the busiest airports, within which development is restricted. The Government's basic policy objective remains not to increase the number of people living, working or congregating in PSZs and, over time, to see the number reduced. Where necessary, the Government expects airport operators to offer to buy property which lies wholly or partly within those parts of the zones where the risk is greatest. The Government's objective is to continue to protect those living near airports by maintaining and, where justified, extending the PSZ system. The expectation is that PSZs will not be needed at Manston in line with previous arrangements.

c) Airports NPS (June 2018)

- 6.21 The Government designated the Airports NPS on 26th June 2018. This followed the initial draft Airports NPS which was published in February 2017 and a revised draft Airports NPS which was published for consultation on the 24th October 2017.
- 6.22 Paragraph 1.1 of the NPS confirms that the UK aviation sector plays an important role in the modern economy, contributing around £20 billion per year and directly supporting approximately 230,000 jobs. It further recognises that the positive impacts of the aviation sector extend beyond its direct contribution to the economy by also enabling activity in other important sectors like business services, financial services, and the creative industries. The UK has the third largest aviation network in the world, and London's airports serve more routes than the airports of any other European city.
- 6.23 However, Paragraph 1.2 of the NPS fully recognises that London and the South East are now facing longer term capacity problems. Heathrow Airport is operating at capacity today, Gatwick Airport is operating at capacity at peak times, and the whole London airports system is forecast to be full by the mid-2030s. The NPS appreciates that there is still spare capacity elsewhere in the South East for point to point and especially low cost flights. However, with very limited capability at London's major airports, London is beginning to find that new routes to important long haul destinations are being set up elsewhere in Europe and this is having an adverse impact on the UK economy, and affecting the country's global competitiveness.
- 6.24 On 25th October 2016, the Government announced that a Northwest Runway at Heathrow Airport, combined with a significant package of supporting measures, was the Government's preferred scheme to deliver additional airport capacity in the South East of England. It also confirmed that this would be included in a draft Airports NPS, to be the subject of consultation according to the procedures laid down in the Planning Act 2008 (paragraph 1.10). The draft Airports NPS was published on 2nd February 2017. On publishing the draft Airports NPS, the Government made a commitment to continue updating its evidence base on airport capacity, including revised passenger demand forecasts and the impact of the publication of the final Air Quality Plan (the UK plan for tackling roadside nitrogen dioxide concentrations). In order to provide clarity, the Government revised

the draft Airports NPS and some of the other documents which were published alongside it, on the basis of these changes to the evidence base and as a result of initial consideration of the responses to the February consultation and other broader government policy changes which have arisen during this period.

6.25 The Airports NPS sets out (paragraph 1.13):

- The Government's policy on the need for new airport capacity in the South East of England;
- The Government's preferred location and scheme to deliver new capacity; and
- Particular considerations relevant to a development consent application to which the Airports NPS relates.

6.26 The NPS recognises that it is imperative that the UK continues to grow its domestic and international connectivity until the expansion of Heathrow is complete, which it considered to be the more intensive use of existing airports other than Heathrow and Gatwick (paragraph 1.6).

6.27 The NPS reaffirms that international connectivity is important to the success of the UK economy as it facilitates trade in goods and services and is particularly important for many of the fastest growing sectors of the economy (paragraph 2.1). The NPS recognises that airports are the primary gateway for vital time-sensitive freight services (paragraph 2.2) and that the aviation sector benefits the UK economy through its direct contribution to GDP and employment, and by facilitating trade and investment, manufacturing supply chains, skills development, and tourism (paragraph 2.3).

6.28 Paragraphs 2.7 and 3.23 refer to the importance of freight services specifically:

“2.7 – Air freight is also important to the UK economy. Although only a small proportion of UK trade by weight is carried by air, it is particularly important for supporting export-led growth in sectors where goods are of high value or time critical. Heathrow Airport is the UK’s biggest freight port by value. Over 178 billion of air freight was sent between UK and non-European Union countries in 2016, representing over 45% of the UK’s extra-European Union trade by value. This is especially important in the advanced manufacturing sector, where air freight is a key element of the time-critical supply chain. By 2030, advanced manufacturing industries such as pharmaceuticals or chemicals, whose components and products are predominately moved by air, are expected to be among the top five UK export markets by their share of value. In the future, UK manufacturing competitiveness and a successful and diverse UK economy will drive the need for quicker air freight.

3.23 - The aviation sector can also boost the wider economy by providing more opportunities for trade through air freight. The time-sensitive air freight industry, and those industries that use air freight, benefit from greater quantity and frequency of services, especially long haul. By providing more space for cargo, lowering costs, and by the greater frequency of services, this should in turn provide a boost to trade and GDP benefits.”

6.29 The Proposed Development will help to address many of the key issues identified within the Airports NPS and will provide much needed new airport capacity in the South East to complement the existing

London airports but also to relieve them of some of the problems they are facing in relation to handling air freight and especially at peak-times. Providing dedicated air freight facilities will ensure that the UK does not continue to lose out to other European airports thereby maximising benefits for the UK economy and ensuring that the UK remains competitive in the global market.

- 6.30 In particular, and again, consistent with the Government's national policy on airports, the Proposed Development will deliver much needed airport capacity in the South East to grow connectivity before any expansion at Heathrow. The Azimuth Associates Report [document reference TR020002/APP/7.4] confirms that Manston Airport would continue to operate as a viable airport even after any new runway at Heathrow is delivered based on the predicted forecasts.
- 6.31 The Proposed Development especially accords with the Airport NPS because it will deliver dedicated air freight services including vital time-sensitive freight services which the Government recognises makes an important contribution to the UK economy. The Proposed Development will mean that Manston Airport will contribute more to the UK economy as it facilitates a significant increase in the amount of freight that is carried by air thereby strengthening the UK import and export markets which are predicted to grow in the future. Manston Airport will be able to deliver air freight more quickly thereby boosting the wider economy. It will also provide more opportunities for direct and dedicated freight handling; a greater quantity and frequency of service and more space to handle goods – all of which will boost trade and economic benefits.

Assessment Principles

- 6.32 Chapter 4 of the Airports NPS concerns Assessment Principles and sets out the general policies in accordance with which applications relating to a Northwest Runway at Heathrow Airport are to be decided. Paragraph 4.1 makes clear that Chapter 4 is specific to assessments necessary for the Heathrow Northwest Runway scheme. However, there are general policies contained within this chapter which would equally apply in the assessment of other nationally significant airport projects not at Heathrow – and which are 'important and relevant' to the consideration of this DCO application. These are identified below and examined further in Section 9 of this statement and the other DCO application documents.

General Principles of Assessment

- 6.33 Paragraph 4.4 makes clear that in considering any proposed development, and in particular when weighing its adverse impacts against its benefits, the Examining Authority and the Secretary of State will take into account:
- Its potential benefits, including the facilitation of economic development (including job creation) and environmental improvement, and any long term or wider benefits; and
 - Its potential adverse impacts (including any longer term and cumulative adverse impacts) as well as any measures to avoid, reduce or compensate for any adverse impacts.
- 6.34 In this context, paragraph 4.5 explains that environmental, safety, social and economic benefits and adverse impacts should be considered at national, regional and local levels. The Secretary of State will also have regard to the manner in which such benefits are secured, and the level of confidence in their delivery.

- 6.35 Paragraph 4.9 states that the Examining Authority should only recommend, and the Secretary of State will only impose, requirements in relation to a development consent, that are necessary, relevant to planning, relevant to the development to be consented, enforceable, precise, and reasonable in all other respects. This paragraph states that the need for requirements in respect of the phasing of a scheme is likely to be an important consideration, so that effects of construction and operational phases are properly mitigated, as well as any changes in the operations of the airport that may occur in line with the phasing of physical works and commencement of operations. Guidance on the use of planning conditions or any successor to it should be taken into account where requirements are proposed. Paragraph 4.10 further states that obligations under Section 106 of the Town and Country Planning Act 1990 should only be sought where they are necessary to make the development acceptable in planning terms, (including where necessary to ensure compliance with the Airports NPS), directly related to the proposed development, and fairly and reasonably related in scale and kind to the development.

Environmental Impact Assessment

- 6.36 Paragraph 4.12 states that all proposals that are subject to the European Union's Environmental Impact Assessment Directive and are likely to have significant effects on the environment, must be accompanied by an Environmental Statement (ES), describing the aspects of the environment likely to be significantly affected by the project. The DCO is supported by an ES which, in accordance with the Directive, identifies, describes and assesses the effects on human beings, fauna and flora, soil, water, air, climate, the landscape, material assets and cultural heritage, and the interaction between them. In accordance with Schedule 4 to the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, it also includes a description of the likely significant effects of the proposed project on the environment, covering the direct effects and any indirect, secondary, cumulative, short-, medium- and long-term, permanent and temporary, positive and negative effects of the project, and also the measures envisaged for avoiding or mitigating significant adverse effects.
- 6.37 Paragraph 4.13 states that when examining a proposal to which the Airports NPS applies, the Examining Authority should ensure that likely significant effects at all stages of the project have been adequately assessed. The effects of any changes in operations, including the number of air traffic movements, during the construction and operational phases must be properly assessed and appropriate mitigation secured for any significant effects. This is addressed in the ES submitted with this DCO as are the cumulative effects which are assessed in line with paragraph 4.14 of the NPS. This states that when considering significant cumulative effects, any environmental statement should provide information on how the effects of an applicant's proposal would combine and interact with the effects of other development (including projects for which consent has been granted, as well as those already in existence if they are not part of the baseline). This assessment is found in Chapter 18 of the ES [document reference TR020002/APP/5.2-3].
- 6.38 Paragraph 4.16 is particularly relevant to the consideration of this DCO and states that in cases where it may not be possible at the time of the application for development consent for all aspects of the proposal to have been settled in precise detail, the applicant should explain in its application which elements of the proposal have yet to be finalised, and the reasons why this is the case. This is set out in Chapters 3 and 5 of the ES [document reference TR020002/APP/5.2-1].
- 6.39 In accordance with paragraph 4.17, effort has been made by RiverOak in this DCO to refine the detail of the Proposed Development. However, and because certain details are still to be finalised, the ES

sets out in Chapter 3 the relevant design parameters used for the assessment [document reference TR020002/APP/5.2-1]. The ES explains, with reference to the parameters, what the maximum extent of the proposed development may be and assesses the potential adverse effects which the project could have, to ensure that the impacts of the project as it may be constructed have been properly assessed. In accordance with paragraph 4.18, the expectation is that should the Secretary of State decide to grant development consent for an application where details are still to be finalised, such is the case here, that this will need to be reflected in appropriate development consent requirements in the development consent order – and indeed, the draft DCO submitted with the application includes such requirements.

- 6.40 RiverOak acknowledge the further advice in paragraph 4.18 which states that at a later stage, and after the grant of development consent, should they wish (for technical or commercial reasons) to construct the development in such a way that it is outside the terms of what has been consented, for example because its extent will be greater than has been provided for in terms of the consent, that it will be necessary for them to apply for a change to be made to the development consent provided under the Planning Act 2008.

Habitats Regulations Assessment

- 6.41 Paragraph 4.19 states that prior to granting development consent, the Secretary of State as competent authority must comply with the duties under the Conservation of Habitats and Species Regulations 2017. Under these regulations, if the competent authority considers that the proposed development is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects), and is not connected with or necessary to the management of that site, it must make an Appropriate Assessment of the implications for the site in view of the site's conservation objectives. Paragraph 4.20 states that the Applicant is required to provide sufficient information with their applications for development consent to enable the Secretary of State to carry out an Appropriate Assessment if required. This information should include details of any measures that are proposed to minimise or avoid any likely significant effects on a European site. The information provided may also assist the Secretary of State in concluding that an Appropriate Assessment is not required because significant effects on European sites are sufficiently unlikely that they can be excluded.

- 6.42 The Appropriate Assessment is provided in Appendix 7.1 of Chapter 7 of the ES [document reference TR020002/APP/5.2-6]. It provides the necessary information for the Secretary of State for Transport to undertake a Habitats Regulations Assessment (HRA) under the Conservation of Habitats and Species Regulations 2017 (the 'Habitats Regulations').

Equalities

- 6.43 Paragraph 4.27 states that for any application to be considered compliant with the Airports NPS, it must be accompanied by a project level Equality Impact Assessment examining the potential impact of that project on groups of people with protected characteristics. This assessment is provided in the Health and Wellbeing chapter of the ES (Chapter 15 – document reference TR020002/APP/5.2-2).

Assessing Alternatives

- 6.44 Paragraph 4.28 requires that the applicant should comply with all legal obligations and policy set out in the Airports NPS on the assessment of alternatives. In particular, it recognises that the Environmental Impact Assessment Directive requires projects with significant environmental effects to include a description of the reasonable alternatives studied by the applicant which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the significant effects of the project on the environmental effects. This is set out in Chapter 2, Section 2.3 of the ES [document reference TR020002/APP/5.2-1].

Criteria for 'good design' for airports infrastructure

- 6.45 In accordance with paragraph 4.29, RiverOak has included design as an integral consideration from the outset of a proposal and visual appearance has also been an important factor in considering the scheme design, as well as functionality, fitness for purpose, sustainability and cost (paragraph 4.30). The Airports NPS states that applying 'good design' to airports projects should therefore produce sustainable infrastructure sensitive to place, efficient in the use of natural resources and energy used in their construction, and matched by an appearance that demonstrates good aesthetics as far as possible.
- 6.46 The Design and Access Statement [document reference: TR020002/APP/7.3] sets out the approach to design that has been taken and explains how full account has been taken of the saved design policies in the 2006 adopted Thanet District Local Plan and paragraph 4.31 of the Airports NPS which states that good design should meet the principal objectives of the scheme by eliminating or substantially mitigating the identified problems by improving operational conditions and simultaneously minimising adverse impacts. It should also mitigate any existing adverse impacts wherever possible, for example in relation to safety or the environment. Paragraph 4.32 states that the Secretary of State will need to be satisfied that projects are sustainable and as aesthetically sensitive, durable, adaptable and resilient as they can reasonably be, having regard to regulatory and other constraints and including accounting for natural hazards such as flooding. Paragraph 4.33 states that the scheme should take into account, as far as possible, both functionality, including fitness for purpose and sustainability, and aesthetics, including the scheme's contribution to the quality of the area in which it would be located. This is also addressed in the Design and Access Statement [document reference: TR020002/APP/7.3] in addition to an explanation of how the design process was conducted and how the proposed design evolved (paragraph 4.35 of the Airports NPS). It is noted that the Examining Authority and Secretary of State will take into account the ultimate purpose of the infrastructure and bear in mind the operational, safety and security standards which the design has to satisfy.

Costs

- 6.47 Paragraph 4.39 states that the applicant should demonstrate in its application that its scheme is cost-efficient and sustainable, and seeks to minimise costs to airlines, passengers and freight owners over its lifetime. Whilst this is relevant primarily to the Heathrow Northwest Runway, RiverOak have set out the relevant details applicable to their scheme in the Funding Statement provided with the DCO [document reference: TR020002/APP/3.2].

Climate Change Adaptation

- 6.48 Paragraph 4.43 states that adaptation is necessary to deal with the potential impacts of the climate change changes that are already happening. It requires new development to be planned to avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the provision of green infrastructure. Paragraph 4.45 requires applicants to consider the impacts of climate change when planning design, build and operation. Any accompanying environmental statement should set out how the proposal will take account of the projected impacts of climate change. This information is contained in Chapter 16 of the ES which also considers appropriate mitigation or adaptation measures as required by paragraphs 4.49, 4.50 and 4.51 [document reference TR020002/APP/5.2-2].

Pollution Control and other environmental protection regimes

- 6.49 Issues relating to discharges or emissions from a proposed project which affect air quality, water quality, land quality or the marine environment, or which include noise, may be subject to separate regulation under the pollution control framework or other consenting and licensing regimes. Paragraph 4.53 confirms that relevant permissions will need to be obtained for any activities within the development that are regulated under those regimes before the activities can be operated. The DCO includes a document which details which other such consents and licences are needed [document reference: TR020002/APP.7.6].
- 6.50 Paragraph 4.54 states that in deciding an application, the Secretary of State should focus on whether the development is an acceptable use of the land, and on the impacts of that use, rather than the control of processes, emissions or discharges themselves. The Secretary of State should assess the potential impacts of processes, emissions or discharges to inform decision making, but should work on the assumption that, in terms of the control and enforcement, the relevant pollution control regime will be properly applied and enforced. Decisions under the Planning Act 2008 should complement but not duplicate those taken under the relevant pollution control regime.
- 6.51 Paragraph 4.59 makes clear that the Secretary of State should not refuse consent on the basis of regulated impacts unless there is good reason to believe that any relevant necessary operational pollution control permits or licences or other consents will not subsequently be granted.

Common law nuisance and statutory nuisance

- 6.52 Paragraph 4.61 states that during the examination of an application for development consent for infrastructure covered under the Airports NPS, possible sources of nuisance under Section 79(1) of the Environmental Protection Act 1990 and under Sections 76 and 77 of the Civil Aviation Act 1982 should be considered by the Examining Authority. The Examining Authority should also consider how those sources of nuisance might be mitigated or limited so they can recommend appropriate requirements that the Secretary of State might include in any subsequent order granting development consent. A Statement relating to Statutory Nuisances is submitted with the DCO [document reference: TR020002/APP/5.2-14]. It concludes that with mitigation in place, none of the statutory nuisances identified in Section 79(1) of the Act is predicted to arise.

Security Considerations

- 6.53 Paragraph 4.64 recognises that the nature of the aviation sector as a target for terrorism means that security considerations will likely apply in the case of the infrastructure project for which development consent may be sought under the Airports NPS. Paragraph 4.65 states that where national security implications have been identified, the applicant should consult with relevant security experts from the Centre for the Protection of National Infrastructure and the Department for Transport to ensure that physical, procedural and personnel security measures have been adequately considered in the design process, and that adequate consideration has been given to the management of security risks. This is discussed in Chapter 17 of the ES [document reference TR020002/APP/5.2-3] but full security details will come forward in the detailed design stage.

Health

- 6.54 Paragraph 4.72 requires that where the proposed project has likely significant environmental impacts that would have an effect on human beings, any environmental statement should identify and set out the assessment of any likely significant health impacts. Paragraph 4.73 states that the applicant should identify measures to avoid, reduce or compensate for adverse health impacts as appropriate and that the cumulative impact on health should be considered. Chapter 15 of the ES [document reference TR020002/APP/5.2-2] addresses Health and Wellbeing matters. The DCO application also includes a separate Health Impact Assessment which is Appendix 15.1 to the ES [document reference: TR020002/APP/5.2-13].

Accessibility

- 6.55 Paragraph 4.76 requires the applicant to include clear details of how plans will improve access on and around the airport by designing and delivering schemes that address the accessibility needs of all those who use, or are affected by, surface access infrastructure, including those with physical and/or mental impairments as well as older users. The Airports NPS recognises that easy access and car parking provision at the airports is essential to this goal and must meet standards set down in guidance (such as the Department for Transport's Inclusive Mobility). This is discussed in the Transport Assessment which is submitted with the DCO [document reference TR020002/APP/5.2-15].
- 6.56 Section 9 of this statement considers the assessment requirements set out in Chapter 5 under each of the topic headings listed above and a summary of the main conclusions, alongside the mitigation that is put forward as part of this DCO.

Assessment of Impacts

- 6.57 Chapter 5 of the Airports NPS concerns the Assessment of Impacts. Paragraph 5.1 confirms that the chapter focusses on the potential impacts of the Heathrow Northwest Runway scheme, the assessments that any applicant will need to carry out, and the specific planning requirements that they will need to meet, in order to gain development consent. It is reasonable to assume that the requirements set out in the chapter will equally be important and relevant to the consideration of other nationally significant airport infrastructure projects and so it is appropriate to consider them alongside the proposals for development in this DCO. Paragraph 5.2 notes that in its Final Report, the Airports Commission recommended that to make airport expansion possible [at Heathrow].... a comprehensive package of accompanying measures [should be recommended] to make the airport's expansion more acceptable to the local community and a need for measures to mitigate the impacts

of increased capacity and to enhance beneficial effects (paragraphs 5.2 and 5.3). RiverOak have proposed a comprehensive mitigation package alongside their proposals for development as detailed in the Noise Mitigation Plan [document reference TR020002/APP/2.4] and Register of Environmental Actions and Commitments [document reference TR020002/APP/2.5] as submitted with the DCO.

6.58 Chapter 5 is set out under a series of topics and under each topic, advice is provided in terms of what an applicant must assess; the mitigation that is likely to be required and the objectives that this mitigation should achieve and factors that will be considered by the Secretary of State when making a decision. The topic areas covered which are of relevance to the consideration of this DCO application are as follows:

- Surface Access
- Air Quality
- Noise
- Carbon Emissions
- Biodiversity and Ecological Conservation
- Resource and Waste Management
- Flood Risk
- Water Quality and Resources
- Historic Environment
- Landscape and Visual Impacts
- Land Instability
- Community Compensation

6.59 Section 9 of this statement considers the assessment requirements set out in Chapter 5 under each of the topic headings listed above and a summary of the main conclusions, alongside the mitigation that is put forward as part of this DCO and in light of the Airports NPS mitigation advice. Furthermore, Section 9 of this statement will consider whether the Proposed Development is acceptable alongside the decision making advice provided in Chapter 5 of the draft Aviation NPS.

d) *'Beyond the Horizon : The Future of Aviation in the UK'* (July 2017) – a consultation on the new Aviation Strategy White Paper (expected 2018)

6.60 The Government has published a call for evidence consultation document to establish views on the approach the Government is proposing to take on a number of aviation issues identified to inform the Aviation Strategy. The consultation document is *entitled 'Beyond the Horizon : The Future of Aviation in the UK'* (July 2017). The new strategy is proposed to focus on aviation covering the whole country and for a long term strategy; with the consultation process examining the effect on all of the UK's regions. The expectation is that the White Paper will sit alongside the Airports NPS and that together, they will constitute the Government's new aviation policy and framework.

- 6.61 The strategy is proposed to focus on aviation covering the whole country and for a long term strategy; with the consultation process examining the effect on all of the UK's regions. It is stated that the aim of the Aviation Strategy is:

“To achieve a safe, secure and sustainable aviation sector that meets the needs of consumers and of a global, outward-looking Britain.”

- 6.62 It is recognised within the consultation document that before a new runway is built, for the UK to grow its domestic and international capacity, there is a need for existing runways throughout the UK to be more intensively utilised. The Government also recognises that airports across the UK make a vital contribution to the health of the whole country. Of particular interest is part of paragraph 7.20:

“The Government agrees with the Airports Commission's recommendation that there is a requirement for more intensive use of existing airport capacity and is minded to be supportive of all airports who wish to make best use of their existing runways including those in the South East.”

- 6.63 In June 2018, the Government reported on the feedback received from the Aviation Strategy call for evidence document, specifically on its proposal to support airports throughout the UK by making best use of their existing runways. “Beyond the Horizon: The Future of Aviation in the UK – Making best use of existing runways” (June 2018) reported that 60% of the relevant responses were in favour of the Government's proposal, 17% against and 23% supportive provided certain issues were addressed (paragraph 1.7). Paragraph 1.26 states the Government's expectation for airports wishing to increase either their passenger or air traffic movement caps to allow them to make best use of their existing runways to submit applications to the relevant planning authority. Paragraph 1.27 states that applications to increase caps by 10mppa or more or deemed nationally significant would be considered as NSIPs under the Planning Act 2008 and would be considered by the Secretary of State. The Government makes clear (paragraph 1.26) that as part of any planning application, airports will need to demonstrate how they will mitigate against local environmental issues, taking account of relevant national policies, including any new environmental policies emerging from the Aviation Strategy. Paragraph 1.29 therefore concludes that:

“Therefore the Government is supportive of airports beyond Heathrow making best use of their existing runways. However, we recognise that the development of airports can have negative as well as positive local impacts, including on noise levels. We therefore consider that any proposals should be judged by the relevant planning authority, taking careful account of all relevant considerations, particularly economic and environmental impacts and proposed mitigations.”

- 6.64 The emerging Aviation Strategy outlines the importance of aviation supporting the UK's manufacturing and service sectors throughout the world. Aviation has a key role to play in achieving the Government's ambitions to increase productivity and grow the economy. As part of its objective to support sustainable economic growth, the Government will look at how best to encourage regional connectivity to ensure these opportunities are open to the whole of the UK.

- 6.65 Reopening Manston Airport will allow an existing runway of considerable length and width to be used much more intensively. The Proposed Development is therefore entirely compliant with the Government's emerging national Aviation Strategy.

e) Other considerations

- 6.66 Whilst not Government policy, it is important to consider other publications that have informed adopted and emerging Government aviation policy where relevant to this DCO.

Airports Commission Interim Report (December 2013)

- 6.67 Specifically in relation to Manston Airport, the Airports Commission Interim Report (December 2013) in Appendix 2 : Assessment of Long-Term Options, is supportive of Manston Airport recognising that it:

“.....presents some potential as a reliever airport, but does not address the larger question of London South East capacity. The concept of reliever airports is considered in short and medium term work. Please see Appendix 1 for further information.”

- 6.68 Appendix 1 : Assessment of Short- and Medium-Term Options of the Interim Report - Section 3 ‘Proposals Received and Commission Conclusion’ – table entry number 82 sets out the Commission’s view of reliever airports. It defines the reliever airports concept as providing:

“support and/or financial incentives to encourage the growth of airports providing dedicated support for the business and general aviation markets with the potential additional benefit of reducing the use of congested airports for this traffic.”

- 6.69 It goes on to state that:

“The Commission is supportive of the reliever airports concept. The Commission recognises that this may be the best way to cater for the needs of business users without disrupting the wider airport system...”

- 6.70 Paragraph 5.96 explains that under the reliever airports concept, airfields in the vicinity of congested airports are designated to handle specific types of traffic, with a particular emphasis including on business and general aviation, as well as smaller aircraft flying scheduled services. The report recommends at paragraph 5.99 that Government policy should promote the benefits of smaller airports in the London and South East system for accommodating business and general aviation and that furthermore (paragraph 5.100) while the opening hours and other conditions of use of these airports are often matters that should properly be dealt with between the airport and its local authority, the local authorities should support the development of smaller local airports and, alongside consideration of their environmental impacts, also give due consideration to the positive benefits they can bring to the local and regional economy.

- 6.71 It is clear that the Airports Commission accepted that Manston could perform a role as a reliever airport. RiverOak proposal to utilise Manston Airport to provide a dedicated freight hub will assist in relieving the congested air freight market in the South East.

f) National Infrastructure Delivery Plan 2016-2021 (March 2016)

- 6.72 The Government remains determined to deliver better infrastructure in the UK to grow the economy and improve opportunities for people across the country. For the first time, the new National

Infrastructure Delivery Plan brings together the Government's plans for economic infrastructure over the next 5 years with those to support delivery of housing and social infrastructure.

6.73 By the end of 2020-21, the Government expects:

- A decision on a preferred new runway in the South East and preparation of a new Airports National Policy Statement;
- New airport infrastructure at Manchester, Luton, Heathrow and Gatwick;
- Improved rail access to Manchester, Gatwick and Heathrow; and
- A dozen road projects to support access to ports and airports either complete or in construction.

6.74 Chapter 5 relates to Airports and Ports and recognises that they are the gateways providing the international connections the UK needs to grow and prosper (paragraph 5.2). They facilitate the movement of goods, people and ideas around the world, to support trade and investment and allow knowledge and innovation to be shared. They also provide social benefits, enabling UK citizens to visit family and friends overseas, experience different cultures or simply enjoy a well-earned holiday.

6.75 Paragraph 5.3 states that airports and ports also play a very important role across the UK, providing vital domestic and international connections, and making a significant contribution to the growth of regional economies with the UK having the third largest aviation network in the world, after the USA and China. It recognises however, that there is a capacity and connectivity challenge, particularly in the South East. In paragraph 5.4, the Government confirms its acceptance of the case for expansion of airport capacity in the region with a shorter term key priority being to make better use of existing runway capacity at all UK airports.

6.76 In terms of a Delivery Strategy for Airports, paragraph 5.6 confirms that the Government's objectives are to:

- ensure that the UK's air links continue to make it one of the best connected countries in the world;
- ensure the aviation sector makes a significant and cost-effective contribution towards reducing global emissions; and
- to limit, and where possible reduce, the number of people in the UK significantly affected by aircraft noise.

6.77 In paragraph 5.7, the Government states that it supports competition as an effective way to meet the interests of passengers and other users. It also welcomes the significant levels of private sector investment in airport infrastructure and establishment of new routes to developed and emerging markets.

6.78 In paragraph 5.11, it is recognised that smaller airports are vital for local economies, opening up opportunities and connecting the UK. The government is working to ensure that there are sufficient and effective connections to airports to handle current and future capacity requirements and through Highways England and Network Rail is bringing forward a number of road and rail projects to improve surface access (paragraph 5.12).

- 6.79 In terms of freight, the Plan recognises that roads are used for almost 70% of freight journeys (paragraph 3.1) and that moving freight by means other than using roads will relieve road congestion and reduce carbon emissions (paragraph 4.1).

7 NATIONAL PLANNING POLICY FRAMEWORK

a) Introduction

- 7.1 The NPPF confirms that it does not affect, add to or alter the policy regime for NSIPs as set out in the NPSs. However, in the absence of a directly applicable Airports NPS, it is important and relevant to consider the NPPF as it contains policies which have been considered in developing the Proposed Development for achieving sustainable development.
- 7.2 The NPPF (March 2012) sets out the Government's planning policies for England and how these are expected to be applied (Paragraph 1). It states that planning law requires that applications must be determined in accordance with the Development Plan, unless material considerations indicate otherwise, and that the NPPF must be taken into account in the preparation of local and neighbourhood plans, and is a material consideration in planning decisions (Paragraph 2).
- 7.3 Paragraph 3 specifically states that the NPPF does not contain specific policies for nationally significant infrastructure projects for which particular considerations apply. These are determined in accordance with the decision-making framework set out in the Planning Act 2008 and relevant national policy statements for major infrastructure, as well as any other matters that are considered both important and relevant (which may include the NPPF). It continues to state that National Policy Statements (NPSs) form part of the overall framework of national planning policy and are a material consideration in decisions on planning applications. The Airports NPS is considered to be a material consideration in the determination of this DCO application.

Presumption in favour of sustainable development

- 7.4 At the heart of the NPPF is a presumption in favour of sustainable development which in terms of decision-taking, and outside of the policy framework for determining NSIPs, normally means approving development proposals that accord with the Development Plan without delay or where the Development Plan is absent, silent or relevant policies are out-of-date, granting planning permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the NPPF taken as a whole or if specific policies in the NPPF indicate that development should be restricted (Paragraph 14).
- 7.5 Paragraph 7 explains that there are three dimensions to sustainable development - economic, social and environmental – which give rise to the need for the planning system to perform a number of roles:
- an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure. This is especially relevant to the consideration of the appeal proposals.
 - a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations and by creating a high

quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and

- an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

7.6 Paragraph 17 specifically addresses the role that the planning system should play and sets out a core list of land use planning principles which should underpin the plan-making and decision-taking process. These include:

1. **“- proactively drive and support sustainable economic development to deliver infrastructure that the country needs, making every effort to objectively identify and then meet development needs of an area, and respond positively to wider opportunities for growth**
2. **encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value.”**

7.7 Reopening the airport at Manston represents the most sustainable form of aviation development through reusing a redundant brownfield airfield and the infrastructure that already exist there. The proposals are fully supported by the relevant policies in the Development Plan which safeguard the airport site for airport uses. This has recently been tested as part of a planning appeal by Lothian Shelf Limited (see Appendix 4 for appeal decision) where the safeguarding policies were found to be in accordance with national policy and therefore attracted significant weight. As demonstrated in later sections of this report, there are no adverse impacts which would outweigh the benefits of the scheme. The scheme will contribute significantly to the national, regional and local economy not only on monetary terms but also through providing much-needed jobs in an area which demonstrates higher than average unemployment. Environmentally, and through the mitigation being proposed, the scheme will bring a number of benefits including to surface access, resource management and land quality. The social benefits of the scheme not only for job and wealth creation but for tourism, well-being and culture, and health and also notable. The proposal will deliver infrastructure that the country desperately needs and will act as a catalyst to stimulate opportunities for growth especially in the local and regional area which are needed. For these reasons, the proposals are fully in accordance with the policy objectives on the NPPF.

Building a strong, competitive economy

7.8 The NPPF clearly states that the Government is committed to securing economic growth in order to create jobs and prosperity, building on the country's inherent strengths, and in meeting the twin challenges of global competition and of a low carbon future (Paragraph 18) and that it is committed to ensuring that the planning system does everything it can to support sustainable economic growth. Importantly in the context of this DCO application, the NPPF states that planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system (Paragraph 19). To help achieve economic growth, the NPPF states that Local Planning Authorities should plan

proactively to meet the development needs of business and support an economy fit for the 21st century (Paragraph 20).

- 7.9 The proposal is underpinned by an ambition to deliver much needed infrastructure to maintain the UK's global position and connectivity which in turn will secure significant economic growth within the UK airports sector and for the country as a whole. It will contribute significantly to the UK aviation sector which plays a significant role within the UK economy. A direct benefit of the proposal is its ability to stimulate local and regional prosperity including through the creation of a sizeable number of jobs (approximately 4,271 direct jobs in the next 20 years and approximately 30,326 direct, indirect and catalytic jobs) thereby further contributing to the important economic role that the aviation sector plays. The NPPF supports sustainable economic growth and significant weight should be afforded to the contribution that this proposal will make to building a strong and competitive economy. The development proposals are full in accordance with these NPPF objectives.

Promoting Sustainable Transport

- 7.10 Specifically in relation to airports, the NPPF states in Paragraph 31 that local planning authorities should work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development, including large scale facilities such as rail freight interchanges, roadside facilities for motorists or transport investment necessary to support strategies for the growth of ports, airports or other major generators of travel demand in their areas.
- 7.11 Paragraph 33 of the NPPF sets out the policy framework against which airport proposals should be considered and states:

“When planning for ports, airports and airfields that are not subject to a separate national policy statement, plans should take account of their growth and role in serving business, leisure, training and emergency service needs. Plans should take account of this Framework as well as the principles set out in the relevant national policy statements and the Government Framework for UK Aviation.”

- 7.12 The Manston Airport site is safeguarded in the saved policies of the 2006 Thanet District Local Plan for airport uses. Reopening the airport will comply completely with these policies and will deliver much needed infrastructure which will address airport capacity issues in London and the South East. The NPPF supports airport growth and recognises the role that reopening Manston will play in achieving the aims of Government Aviation Policy (see earlier section).

Infrastructure

- 7.13 Paragraph 162 of the NPPF relates specifically to infrastructure and states that local planning authorities should take account of the need for strategic infrastructure including nationally significant infrastructure within their areas. Regrettably, Thanet District Council has not properly engaged with or taken into account RiverOak's proposals for reopening Manston Airport which would be a nationally significant infrastructure project that would realise both the local and regional economic growth aspirations in addition to contributing significantly to the wider UK economy.

Requiring good design

- 7.14 NPPF paragraph 65 outlines that:

“Local planning authorities should not refuse planning permission for buildings or infrastructure which promote high levels of sustainability because of concerns about incompatibility with an existing townscape, if those concerns have been mitigated by good design (unless the concern relates to a designated heritage asset and the impact would cause material harm to the asset or its setting which is not outweighed by the proposal’s economic, social and environmental benefits).”

- 7.15 Based on the NPPF guidance it is imperative that the design is assessed against the wider sustainability benefits that the reopening of Manston Airport will provide. This is in accordance with guidance contained in the Airports NPS (paragraphs 4.29 to 4.35).

Promoting healthy communities

- 7.16 Paragraph 69 of the NPPF looks to promote safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion. It also promotes safe and accessible developments that include clear and legible pedestrian routes, and high quality public spaces, encouraging active and continued use of public areas.
- 7.17 NPPF paragraph 70 seeks that planning decisions plan positively for the provision and use of shared space, community facilities, including cultural buildings to enhance the sustainability of communities and residential environments; any unnecessary loss of these valued facilities should be guarded against.
- 7.18 The scheme has been designed to reflect best design practice in full recognition of the site constraints and opportunities. This is discussed within the Design and Access Statement submitted with the DCO [document reference: TR020002/APP/7.3]. The museum quarter shown in the Masterplan [document reference: TR020002/APP/7.1] will be a proud community facility that will connect the history of the site to the new airport. There will be no net loss of community facilities as part of the proposed development.

Meeting the challenge of climate change, flooding and coastal change

- 7.19 It is recognised in NPPF paragraph 93, that planning plays a key role in helping shape places to secure radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure.
- 7.20 To support the move to a low carbon future, NPPF paragraph 95 looks for local planning authorities to plan for new development in locations and ways which reduce greenhouse gas emissions and to actively support energy efficiency improvements to existing buildings.
- 7.21 NPPF paragraph 98 states that when determining planning applications, local planning authorities should:

- **not require applicants for energy development to demonstrate the overall need for renewable or low carbon energy and also recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions and**
- **approve the application if its impacts are (or can be made) acceptable.**

- 7.22 New development is expected to comply with adopted Local Plan policies on local requirements for decentralised energy supply unless it can be demonstrated, having regard to the type of development involved and its design, that this is not feasible or viable. The application should also take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption. To help increase the use and supply of renewable and low carbon energy, local planning authorities should recognise the responsibility on all communities to contribute to energy generation from renewable or low carbon sources.
- 7.23 To reduce flood risk, NPPF paragraph 103 details that when determining planning applications, local planning authorities should ensure flood risk is not increased elsewhere and only consider development appropriate in areas at risk of flooding where, informed by a site-specific flood risk assessment. The development should be appropriately flood resilient and resistant, include safe access and escape routes where required, and that any residual risk can be safely managed, including by emergency planning; and it gives priority to the use of sustainable drainage systems.
- 7.24 The Design and Access Statement [document reference: TR020002/APP/7.3] and Chapter 16 of the ES sets out what environmental measures relevant to climate change have been incorporated into the proposed development. These measures have been subject to climate change resilience assessment. A Flood Risk Assessment is also submitted with the DCO as Appendix 8.2 of Chapter 8 of the ES [document reference: TR020002/APP/5.2-8]. This concludes that the proposals for development will not increase flood risk elsewhere and that the scheme is flood resilient.

Conserving and enhancing the natural environment

- 7.25 The NPPF outlines that the planning system should contribute to and enhance the natural and local environment by:
- **protecting and enhancing valued landscapes, geological conservation interests and soils**
 - **recognising the wider benefits of ecosystem services**
 - **minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures**
 - **preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability and**

- **remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.**

7.26 Paragraph 111 requires that decisions on development proposals should be based on the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value.

7.27 Paragraph 118 of the NPPF requires that proposals conserve and enhance biodiversity by applying the following principles:

- **if significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused**
- **proposed development on land within or outside a Site of Special Scientific Interest likely to have an adverse effect on a Site of Special Scientific Interest (either individually or in combination with other developments) should not normally be permitted. Where an adverse effect on the site's notified special interest features is likely, an exception should only be made where the benefits of the development, at this site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of Sites of Special Scientific Interest**
- **development proposals where the primary objective is to conserve or enhance biodiversity should be permitted**
- **opportunities to incorporate biodiversity in and around developments should be encouraged**
- **planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss and**
- **the following wildlife sites should be given the same protection as European sites: – potential Special Protection Areas and possible Special Areas of Conservation**
 - listed or proposed Ramsar sites and**
 - sites identified, or required, as compensatory measures for adverse effects on European sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.**

7.28 The NPPF explains that to prevent unacceptable risks from pollution and land instability, new development should be appropriate for its location. The effects (including cumulative effects) of pollution on health, the natural environment or general amenity, and the potential sensitivity of the area or proposed development to adverse effects from pollution, need to be considered. Where a

site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner.

- 7.29 Paragraph 121 of the NPPF requires that the development site is suitable for its new use taking account of ground conditions and land instability, including from natural hazards or former activities such as mining, pollution arising from previous uses and any proposals for mitigation including land remediation or impacts on the natural environment arising from that remediation.
- 7.30 It should be established whether the development is an acceptable use of the land and the impact of the use, rather than the control of processes or emissions themselves where these are subject to approval under pollution control regimes.
- 7.31 NPPF paragraph 123 explains that planning decisions should aim to:
- **avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development**
 - **mitigate and reduce to a minimum other adverse impacts on health and quality of life arising from noise from new development, including through the use of conditions**
 - **recognise that development will often create some noise and existing businesses wanting to develop in continuance of their business should not have unreasonable restrictions put on them because of changes in nearby land uses since they were established and**
 - **identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are valued for their recreational and amenity value for this reason.**
- 7.32 The NPPF describes that planning decisions should ensure that any new development in Air Quality Management Areas is consistent with the local air quality action plan.
- 7.33 The encouragement of good design is considered a means to limit light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.
- 7.34 Chapter 7 of the ES concerns Biodiversity. It considers the changes that are likely to be caused by the proposed development including due to increased light, noise and pollution and concludes that no significant effects are likely. Chapter 11 of the ES considers likely Landscape (and Visual) effects and concludes that following the implementation of mitigation measures, that no significant landscape effects have been predicted for Year 1, Year 10 or Year 20 of the proposed phasing for the development.

Conserving and enhancing the historic environment

- 7.35 The NPPF outlines that in the determination of applications, the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and the desirability of new development making a positive contribution to local character and distinctiveness, all need to be accounted for.

- 7.36 NPPF paragraph 132 states that great weight should be given to the heritage asset's conservation when considering the impact of a proposed development. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting; any harm or loss should require clear and convincing justification. Substantial harm to or loss of a grade II listed building, park or garden should be exceptional. Substantial harm to or loss of designated heritage assets of the highest significance, should be wholly exceptional.
- 7.37 NPPF paragraphs 133 and 134 states that:
- (Paragraph 133) “Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, consent should be refused, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:**
- **the nature of the heritage asset prevents all reasonable uses of the site and**
 - **no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation and**
 - **conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible and**
 - **the harm or loss is outweighed by the benefit of bringing the site back into use.”**
- (Paragraph 134) “Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. “**
- 7.38 The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application, with a balanced judgement being made based on the scale of any harm or loss and the significance of the heritage asset. Development should not result in the loss of the whole or part of a heritage asset without all reasonable steps being taken to ensure the new development will proceed after the loss has occurred.
- 7.39 NPPF paragraph 140 makes it clear that an assessment should be made to establish whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.
- 7.40 Section 9 of the ES concerns the Historic Environment. Whilst effects are expected from the proposed development on on-site buried archaeology and built heritage and off-site indirect effects on designated heritage assets, mitigation is proposed to reduce the magnitude of effect.

b) National Planning Policy Guidance (NPPG)

- 7.41 NPPG is a web-based resource which brings together planning guidance on various topics into one place. It was launched in March 2014 and coincided with the cancelling of the majority of Government Circulars which had previously given guidance on many aspects of planning.
- 7.42 In terms of what should be considered in regard to the development of airport and airfield facilities and their role in serving business, leisure, training and emergency service needs, and with reference to paragraph 33 of the NPPF, paragraph 012 (reference ID 54-012-20150313) of the NPPG repeats the acknowledgement that aviation makes a significant contribution to economic growth across the country, including in relation to small and medium sized airports and airfields (aerodromes). An aerodrome will form part of a larger network. The NPPG states that local planning authorities should have regard to the extent to which an aerodrome contributes to connectivity outside the authority's own boundaries, working together with other authorities and Local Enterprise Partnerships as required by the NPPF. As well as the NPPF, the NPPG reconfirms that local planning authorities should have regard to the Aviation Policy Framework, which sets out government policy to allow aviation to continue making a significant contribution (NPPF paragraph 160).
- 7.43 It further states that a working or former aerodrome could be put forward for consideration as a site for mixed use development (NPPF paragraph 17) that includes continuing, adapting or restoring aviation services in addition to other uses.
- 7.44 For the reasons set out elsewhere in this statement where reference is made to the proposals by Stone Hill Park Limited for the Manston Airport site, using the airport for alternative, non-airport uses would not be viable. Retaining the site in airport use will ensure that significant contributions are made to the UK aviation sector in terms of runway capacity and growth and to the regional and local economy in terms of prosperity – all in accordance with the NPPG.

c) National Planning Policy Framework – Draft Text for Consultation (March 2018)

- 7.45 The draft revised National Planning Policy Framework (NPPF) published in March 2018 incorporates policy proposals previously consulted on in the Housing White Paper and the Planning for the Right Homes in the Right Places Consultation (September 2017). The consultation closes on the 10th May 2018. It is important and relevant to consider the proposed changes to the NPPF in the context of determining this DCO application. The revised NPPF is expected to be adopted in July 2018.
- 7.46 The draft revised NPPF continues to :
- set out the Government's planning policies for England and how these are to be applied (paragraph 1);
 - state that planning law requires applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise (paragraph 2). Paragraph 2 further confirms that the NPPF is a material consideration in planning decisions;
 - state that the NPPF does not contain specific policies for NSIPs and that these are determined in accordance with the decision-making framework set out in the Planning Act 2008 (as amended) and relevant national policy statements for major infrastructure, as well as any other matters that are relevant (which may include the NPPF) (Paragraph 4). It also states that NPSs

form part of the overall framework of national planning policy and are a material consideration in decisions on planning applications.

Achieving sustainable development

- 7.47 Paragraph 7 states that the purpose of the planning system is to contribute to the achievement of sustainable development and much like the 2012 NPPF, states that achieving sustainable development means that the planning system has three overarching objectives (economic, social and environmental) which are interdependent and which need to be pursued in mutually supportive ways so that opportunities can be taken to secure net gains across the different objectives. Paragraph 9 states that planning policies and decisions should play an active role in guiding development towards sustainable solutions but in doing so, should take local circumstances into account, to reflect the character, needs and opportunities of the area.

Presumption in favour of sustainable development

- 7.48 The draft revised NPPF continues to state (paragraph 10) that so that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development. For decision-taking, paragraph 11 states that this means approving development proposals that accord with an up-to-date development plan without delay; or where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless: i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole. Paragraph 12 reconfirms that the presumption in favour of development does not change the statutory status of the development plan as a starting point for decision making.

Strategic Policies

- 7.49 Paragraph 20 states that the strategic policies required for the area of each local planning authority should include those policies, and strategic site allocations, necessary to provide (amongst other things), infrastructure for transport.

Maintaining effective cooperation

- 7.50 The draft revised NPPF promotes effective cooperation and paragraph 28 especially endorses effective and on-going joint working between strategic plan making authorities and relevant bodies which it believes is integral to the production of a positively prepared and justified strategy. In particular, the draft revised NPPF states that joint working should help to determine where additional infrastructure is necessary.

Building a strong, competitive economy

- 7.51 This remains a key theme of the revised draft NPPF. Paragraph 82 states that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. It continues by saying that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any

weaknesses and address the challenges of the future – and that this is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential. Significant weight should therefore be applied in considering the Proposed Development as it will deliver many economic benefits that will boost growth in the UK, regional and especially the local economies which will directly translate into significant social benefits.

Promoting sustainable transport

7.52 Section 9 of the draft revised NPPF concerns promoting sustainable transport. Paragraph 103 states that transport issues should be considered from the earliest stages of plan-making and development proposals, so that:

- a) the potential impacts of development on transport networks can be addressed;
- b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;
- c) opportunities to promote walking, cycling and public transport use are identified and pursued;
- d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for mitigation and for net gains in environmental quality; and
- e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.

7.53 Paragraph 104 states that the planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes so that this can help to reduce congestion and emissions, and improve air quality and public health. This is addressed in the Transport Assessment submitted with the DCO application [document reference TR020002/APP/5.2-15].

7.54 Paragraph 105(e) and 105(f) state that planning policies should:

“(e) provide for any large scale facilities, and the infrastructure to support their operation and growth, taking into account any relevant national policy statements and whether such development is likely to be a nationally significant infrastructure project. For example ports, airports, interchanges for rail freight, roadside services and public transport projects and

(f) recognise the importance of maintaining a national network of general aviation facilities – taking into account their economic value in serving business, leisure, training and emergency service needs, and the Government’s General Aviation Strategy.”

- 7.55 Not only in Manston Airport protected in saved policies in the adopted 2006 Thanet District Local Plan for airport uses but it is understood that Thanet District Council is revising its new Local Plan to take account of the need to continue some policy protection of the Manston Airport site for airport uses following the January 2018 Full Council decision to reject the latest draft of the new Local Plan because it proposed to reallocate Manston Airport for a mixed-use settlement. The RiverOak proposals include facilities for General Aviation as the associated economic benefit is fully acknowledged.
- 7.56 Paragraph 107 states that maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network. The Proposed Development has been developed in accordance with the adopted Thanet District Council car parking standards.
- 7.57 Paragraph 108 specifically states that in assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:
- a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;
 - b) safe and suitable access to the site can be achieved for all users; and
 - c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.
- 7.58 Paragraph 109 states that development should only be prevented or refused on highways grounds if the residual cumulative impacts on the road network or road safety would be severe. The matters addressed in paragraphs 108 and 109 are all considered in the Transport Assessment with accompanies the DCO application [document reference TR020002/APP/5.2-15].
- 7.59 Within this context, paragraph 110 states that applications for development should:
- a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;
 - b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
 - c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;
 - d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and
 - e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

- 7.60 Paragraph 111 states that all developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed. A Transport Assessment is submitted with the DCO application and there is a commitment by the Applicants to deliver a Travel Plan in connection with the proposals for development.

Making effective use of land

- 7.61 Paragraph 118 states that planning policies and decisions should (c) support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated and unstable land; and (d) promote and support the development of under-utilised land and buildings. The Proposed Development will achieve these objectives in the fullest sense and therefore represents a highly sustainable form of development.

Achieving well-designed place

- 7.62 Paragraph 124 reinforces the need for planning policies and decisions to support the creation of high quality buildings and places.

- 7.63 Paragraph 126 states that planning policies and decisions should ensure that developments:
- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
 - b) are visually attractive as a result of good architecture, layout and effective landscaping;
 - c) respond to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
 - d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive and distinctive places to live, work and visit;
 - e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
 - f) create places that are safe, inclusive and accessible, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

- 7.64 Paragraph 127 states that applications that can demonstrate early proactive and effective engagement with the community should be looked on more favourably than those that cannot.

- 7.65 Paragraph 129 states that permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards in plans or supplementary planning documents. Conversely, where the design of a development accords with clear expectations in local policies, design should not be used by the decision-maker as a valid reason to object to development.

- 7.66 The draft revised NPPF continues to acknowledge that design should not be a valid reason to object to development if it can be demonstrated that proper consideration has been taken of relevant guidance and local character. The Design and Access Statement submitted with the DCO [document reference TR020002/APP/7.3] explains exactly how the design objectives set out in the revised draft NPPF have informed the design of the illustrative Masterplan. Full details of exactly what the newly proposed buildings will look like are not known at this stage but they will come forward at a later stage to reflect the design parameters that have been set by the draft DCO.

Planning for climate change

- 7.67 Paragraph 147 states that the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.
- 7.68 Paragraph 149 states that new development should be planned for in ways that:
- a) avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure; and
 - b) can help to reduce greenhouse gas emissions through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards.
- 7.69 Paragraph 152 states that in determining planning applications, local planning authorities should expect new development to:
- a) comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable; and
 - b) take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.
- 7.70 Chapter 16 of the ES [document reference TR020002/APP/5.2-2] considers how the Proposed Development will put climate change adaptation into practice including what climate change mitigation has been deemed to be necessary to minimise expected harmful effects. Chapter 3 of the ES [document reference TR020002/APP/5.2-1] contains details of RiverOak's strategy for resource management including for waste. The Design and Access Statement [document reference TR020002/APP/7.3] sets out the illustrative Masterplan has been designed to take into account adaptation measures but also how the design has adopted the general principles of sustainable development and construction. The Flood Risk Assessment (Appendix 8.2 to the ES – document reference TR020002/APP/5.2-8) explains how the Proposed Development has been assessed to fully consider climate change and flood risk issues.

Planning and flood risk

- 7.71 Paragraph 154 states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.
- 7.72 Paragraph 161 states that when determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment. Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that:
- a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;
 - b) the development is appropriately flood resilient and resistant;
 - c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;
 - d) any residual risk can be safely managed; and
 - e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan.
- 7.73 Paragraph 163 states that major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. The systems used should:
- a) take account of advice from the lead local flood authority;
 - b) have appropriate proposed minimum operational standards;
 - c) have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development; and
 - d) where possible, provide multifunctional benefits.
- 7.74 In the main, the DCO application site boundary is located in Flood Zone 1 where there is the lowest risk of flood. The Flood Risk Assessment (Appendix 8.2 to the ES – document reference TR020002/APP/5.2-8) explains how the Proposed Development has been assessed to fully consider the flood risk issues identified above. Details of the proposed drainage strategy for the site have been discussed with the EA at pre-application stage and are provided in Chapter 3 of the ES [document reference TR020002/APP/5.2-1].

Conserving and enhancing the natural environment

- 7.75 Paragraph 168 states that planning policies and decisions should contribute to and enhance the natural and local environment by:

- a) protecting and enhancing valued landscapes, sites of geological value and soils (in a manner commensurate with their statutory status or identified quality);
- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
- c) maintaining the character of the undeveloped coast, while improving public access to it;
- d) minimising impacts and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
- e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air quality; and
- f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

7.76 In the above sense, the revised draft NPPF does not introduce any new requirements.

7.77 Paragraph 170 states that great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty. The conservation of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within these designated areas should be limited. Planning permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest.

Habitats and Biodiversity

7.78 Paragraph 173 states that when determining planning applications, the following principles should be applied:

- a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;
- b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;
- c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland) should be refused, unless there are wholly exceptional reasons and a suitable mitigation strategy exists. Where development would involve the loss of individual aged

or veteran trees that lie outside ancient woodland, it should be refused unless the need for, and benefits of, development in that location would clearly outweigh the loss; and

- d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for the environment.

Ground Conditions and Pollution

7.79 Paragraph 176 states that planning policies and decisions should ensure that:

- a) a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination. This includes risks arising from natural hazards or former activities such as mining, and any proposals for mitigation including land remediation (as well as potential impacts on the natural environment arising from that remediation);
- b) after remediation, as a minimum, land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990; and
- c) adequate site investigation information, prepared by a competent person, is available to inform these assessments.

7.80 Paragraph 178 states that planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health and living conditions, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:

- a) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and quality of life;
- b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and
- c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.

7.81 Paragraph 179 states that planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.

7.82 Paragraph 180 states that planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (including places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have

unreasonable restrictions placed on them as a result of development permitted after they were established. Where an existing business or community facility has effects that could be deemed a statutory nuisance in the light of new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to secure suitable mitigation before the development has been completed.

- 7.83 Paragraph 181 states that the focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning decisions should assume that these regimes will operate effectively.
- 7.84 The draft changes to the NPPF repeat many of the key policy requirements set out in the NPPF. The new requirements set out in relation to paragraph 180 relating to statutory nuisance are considered in the Statement of Statutory Nuisance [document reference TR020002/APP/5.2-14].

Conserving and enhancing the historic environment

Proposals affecting heritage assets

- 7.85 Paragraph 185 states that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.
- 7.86 Paragraph 186 states that local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.
- 7.87 Paragraph 188 states that in determining applications, local planning authorities should take account of:
- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
 - c) the desirability of new development making a positive contribution to local character and distinctiveness.
- 7.88 Paragraph 189 states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation,

irrespective of the degree of potential harm to its significance. The more important the asset, the greater the weight should be. Paragraph 190 states that any harm or loss to a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.

- 7.89 Paragraph 191 states that where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:
- a) the nature of the heritage asset prevents all reasonable uses of the site; and
 - b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
 - c) conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and
 - d) the harm or loss is outweighed by the benefit of bringing the site back into use.
- 7.90 Paragraph 192 states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal.
- 7.91 Paragraph 193 states that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.
- 7.92 Paragraph 194 states that local planning authorities should not permit loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred.
- 7.93 The requirements set out in the draft changes to the NPPF broadly remain unchanged from that which is set out in the 2012 NPPF.

8 STRATEGIC AND LOCAL FIT

a) Context

- 8.1 Section 105 (2) of the Planning Act 2008 requires that in determining DCO applications where there is no designated NPS, that the Secretary of State needs to take into consideration any matters which he thinks are both important and relevant to the decision. In the absence of a directly applicable Airports NPS, which should confirm those matters which are deemed to be 'important and relevant' to decisions on airport NSIPs, the expectation is that the Secretary of State will need to consider how the proposals for development will 'fit' alongside strategic and local strategies and especially those that seek to address economic and business needs (paragraphs 33 and 160 of the NPPF).
- 8.2 Paragraph 33 of the NPPF states that when planning for ports, airports and airfields that are not subject to a separate national policy statement, plans should take account of their growth and role in serving business, leisure, training and emergency service needs. Plans should take account of this Framework as well as the principles set out in the relevant national policy statements and the Government Framework for UK Aviation.
- 8.3 The following paragraphs consider the extent to which the proposals for development will help to promote and deliver key strategic and local objectives and plans for the wider benefit – and why therefore, the proposals are 'important and relevant.' This section of the statement should be read alongside the Business Case Report that has been prepared by Azimuth Associates and submitted with the DCO application.

b) Historic Fit'

Kent and Medway Structure Plan (September 2006)

- 8.4 The 2013 Revocation Order (S.I 2013/427) revoked the remaining structure plan policies in the region. The Kent and Medway Structure Plan was adopted in September 2006. Its policies were superseded by the adoption of The South East Plan when they no longer formed part of the statutory Development Plan. Its policies are no longer material planning considerations. For reference purposes only, Kent International Airport is referred to in the Kent and Medway Structure Plan as follows:
- Policy TP9: Supporting Public Transport – specific schemes are envisaged to improve public transport services at Kent International (Manston) Airport: Parkway Station.
 - Policy TP23: Major Distribution and Transshipment Centres - Proposals which encourage the transfer of freight from road to rail, between road and air or between road and sea or river, which are designed and landscaped to a high standard, will be supported, with Kent International (Manston) Airport listed specifically, subject to Policy TP24.
 - Policy TP24: Kent International (Manston) Airport - The development of Kent International (Manston) Airport into a regional airport with a capacity of up to 6 million passengers per annum by 2021 will be supported.

The South East Plan (May 2009)

- 8.5 The South East Plan was adopted in May 2009 and was intended to set out the long-term spatial planning framework for the region over the years 2006-2026. Following the announcement of the Coalition Government's intention to abolish Regional Spatial Strategies (RSS), the South East Plan was partially revoked under The Regional Strategy for the South East Plan (Partial Revocation) Order 2013 (S.I. 2013/427). The Order revokes the Regional Spatial Strategy for the South East except for Policy NRM6 (Thames Basin Heaths Special Protection Area).
- 8.6 For reference purposes only, Manston Airport was recognised within the South East Plan as follows:
- Policy T9: Supports an enhanced role for Kent International Airport as an airport of regional significance.
- 8.7 Paragraph 8.30 of the South East Plan recognised that the Air Transport White Paper highlighted the important role that small airports can play in providing access to air services that reduce the pressure on the main airports, particularly in the period before a new runway in the South East is built and that Kent International Airport had the potential to fulfil an enhanced role as a regional airport.

Local Transport Plan for Kent 2011-2016 (April 2011)

- 8.8 The previous Local Transport Plan for Kent, covering the five year period between 2011 and 2016 set out the future strategy of the transport related matters for the County based on the current and expected transport demand.
- 8.9 The Local Transport Plan for Kent stated that Manston Airport (referred to as one of Kent's airports) had plans to expand and is an essential catalysts in regenerating the local areas.
- 8.10 It recognised the significant impact that Manston Airport has on the County's residents, both positive; such as the employment opportunities generated, and negative; including the traffic congestion, noise and environmental pollution associated with its activities. It confirmed that Kent County Council was keen to work with airport operators and Central Government to ensure that these negative externalities are minimised whilst supporting managed expansion where it aligns with the County Council's economic growth and regeneration objectives.
- 8.11 The Local Transport Plan for Kent stated that Manston Airport had significant potential to develop into a regional airport and become one of the largest single generators of economic activity in the County.

East Kent Growth Framework – the East Kent Growth Plan (2013)

- 8.12 The East Kent Growth Plan (2013) 'Open for Growth' prepared by the East Kent Regeneration Board has been withdrawn and is in a process of being replaced.
- 8.13 The now deleted 2013 East Kent Growth Plan recognised East Kent's aviation potential. In referenced Manston Airport in particular in terms of connectivity and stated that "*with the South East in urgent need of increased airport capacity, Manston in particular offers significant scope for growth, with new international passenger services starting in 2013, and an expanding freight market.*"

Manston has the potential to develop as an airport of regional significance, while Lydd also offers scope for expansion.” Paragraph 2.11.1 refers to Manston Airport as an economic asset with the capacity to promote significant employment growth:

“The development of Manston Airport - recent designation as a port of entry’ offers new opportunities to develop Manston’s potential as a major freight airport. In addition, the airport’s passenger role will increase from April 2013, with LM’s announcement of twice-daily flights to Amsterdam from April 2013 – with the potential to further build on Manston’s excellent transport links to develop it as an airport of regional importance.”

- 8.14 Paragraph 3.1.11 discusses potential means of improving Manston’s attractiveness as an employment destination:

“....new opportunities are emerging with the start of direct flights from Manston to Amsterdam in 2013, offering global connections via a major hub. This could lead to further European air services from Manston and could help to enhance Manston’s attractiveness as an employment destination, linked with its excellent road connections.”

Summary

- 8.15 It is evident that historically, Manston Airport has always been protected and supported in regional planning policies in terms of its role in transporting freight but also as a regional airport providing passenger services. Its potential role as an airport of regional significance is well documented and policies sought to enhance this role and the benefits that came from it. Kent International Airport, as it was previously known, was supported in regional policy terms as a small airport which would reduce the pressure on the main South East airports. Its ability to act as a catalyst in regenerating the local area and to provide employment opportunities was also recognised in regional policies – so much so that Kent Council considered that it could become *‘one of the largest single generators of economic activity in the County.’* The scope for the airport to grow both through additional passenger services and as a major freight airport was well documented. It was described as an ‘economic asset.’ Its excellent transport links were further recognised in addition to the opportunities that it offered in terms of global connectivity via major airport hubs including in Amsterdam as well as being an attractive employment destination in its own right.
- 8.16 Given RiverOak’s commitment to reopening and growing the airport, there is no reason to doubt that the airport could once again fulfil the same role and with it, bring significant benefits especially to the regional and local economy and area.

c) London ‘Fit’

The London Plan 2016 (Consolidated with Alterations since 2011)

- 8.17 The London Plan recognises that despite being located outside of Greater London, regional airports provide a key contribution to supporting both the economy and connectivity of London.
- 8.18 With regard to aviation, there is a specific policy in the London Plan (Policy 6.6). It states that adequate airport capacity serving a wide range of destinations is critical to the competitive position

of London in a global economy. Airport capacity serving the capital and wider south-east of England must be sufficient to sustain London's competitive position.

Draft new London Plan (December 2017)

- 8.19 Policy SD2 (Collaboration in the Wider South East) looks for strategic understanding of the transport issues facing the wider south east. It outlines that the Mayor will work with wider south east partners to find solutions to shared strategic concerns including the wider needs for freight.
- 8.20 Policy T8 concerns Aviation and states that the Mayor supports the case for additional aviation capacity in the South East of England provided it would meet London's passenger and freight needs recognising that this is crucial to London's continuing prosperity and to maintaining its international competitiveness and world-city status. Policy T8 sets out the Mayor's opposition to expansion of Heathrow Airport unless it can be shown that no additional noise or air quality harm would result, and that the benefits of future regulatory and technology improvements would be fairly shared with affected communities. Policy T8 further states that any changes to London's airspace must treat London's major airports equitably when airspace is allocated.
- 8.21 Policy T8 further states that better use should be made of existing airport capacity, underpinned by upgraded passenger and freight facilities and improved surface access links, in particular rail.
- 8.22 Paragraph 10.8.4 states that the Mayor recognises the need for additional runway capacity in the south east of England, but this should not be at the expense of London's environment or the health of its residents.
- 8.23 In paragraph 10.8.10, the Mayor recognises that air freight plays an important role in supporting industry in London and the UK, and the provision of both bellyhold and dedicated freighter capacity should be an important consideration when plans for airport development in the south east of England are taken forward.

Summary

- 8.24 There is every reason to believe that Manston Airport could once again become an airport of regional significance and in this sense, contribute once again to the London economy and its connectivity. Through providing additional airport capacity to the South East, Manston will allow London to remain competitive in the global economy. Specifically in its capacity as a hub for air freight, the airport will offer a solution to the strategic concerns shared between London and the South East in terms of freight transport. The Mayor is supportive of additional aviation capacity in the South East especially where it will meet London's passenger and freight needs – which reopening Manston will achieve.
- 8.25 With the Mayor being against the expansion of Heathrow, but supportive of making better use of existing airport capacity, reopening Manston Airport as proposed offers a real and viable opportunity to secure the London benefits of aviation and to address the shortage of airport capacity in the capital – but outside of the already congested London airspace. The Mayor in particular flags up in the emerging London Plan, the importance of considering increased air freight provision when planning for airport development in the South East because of the role this plays in supporting London and UK industry. In this sense, the proposals for development 'fit' very well alongside London's objectives for aviation.

d) Regional Fit'

South East Local Economic Partnership – Strategic Economic Plan (March 2014)

- 8.26 Kent, Medway, Essex, Thurrock, Southend and East Sussex together comprise the South East Local Enterprise Partnership (SELEP) area. By 2021, the SELEP aim is to generate 200,000 private sector jobs (an average of 20,000 a year, or an increase of 11.4% since 2011); complete 100,000 new homes, increasing the annual rate of completions by over 50% compared to recent years; and lever investment totalling £10 billion, to accelerate growth, jobs and homebuilding.
- 8.27 The Growth Deal includes:
- Establishing a £5.2bn SEFUND revolving property investment fund to create the conditions for economic growth by providing the infrastructure necessary to boost business and jobs;
 - Delivering the biggest local transport programme in the country to realise the potential of our growth corridors and sites, transforming connectivity for our businesses and residents unlocking jobs and homes, and bringing substantial benefits to the UK economy;
 - Boosting the productivity of our businesses by bringing together local and national business support services, supplementing access to finance and encouraging closer links to be forged between business and the HE and FE sector; and
 - Investing £128m in skills capital projects aligned to our growth opportunities, stimulating new competition and further strengthening employer influence over wider skills provision.
- 8.28 To realise the growth ambitions for the area, the Plan recognises that the area needs to build upon its economic strengths but that there are challenges which are identified as follows:
- **Gateway to the World** - SELEP's sea ports – and the road and rail networks that serve the ports - provide the UK's most important gateway to the rest of the world. On-going investment in the motorways, national trunk roads and rail networks serving the SELEP's ports is essential to ensure their efficient operations. The congestion arising from the lack of such investment has a material, immediate impact on the productivity of companies throughout the UK and the performance of the UK economy as a whole. Many SELEP businesses and communities find that the lack of investment in the national road network means that they carry significant additional costs arising from congestion. Access to the Channel Ports is also frequently constrained and planned increases in freight and passenger traffic through the Port of Dover and the Channel Tunnel are likely to place further pressure on the M20/A20 and M2/A2 Corridors. Operation Stack directly costs Kent Police and the Highways Agency around £3 million per year, with a wider economic cost in lost investment and delays to local business.
 - **The Workforce** - economic activity is not evenly spread across the SELEP area. Unemployment tends to be higher in more peripheral parts of the LEP, particularly in the coastal communities, and some other areas. Gravesham (9.3%), Medway (10.1%), Tendring (9%), Thanet (12.3%), Hastings (10.7%) and Harlow (9.8%) have the highest rates of unemployment and are in the top fifth of local authorities in England on this measure.
 - **Entrepreneurial Business Culture**

- **Universities and Innovation** – there are nine universities across the SELEP which represent a powerhouse for new knowledge creation, innovation and, along with business, are a driving force behind major economic growth across the LEP.
- **Sector Strengths and Prospects: Rebalancing the Economy** – there are significant opportunities to rebalance the SELEP economy in favour of high value added manufacturing and services, and to reduce the reliance on low value sectors. There are priority sectors for the SE LEP economy that have been identified which have high growth potential. These are advanced manufacturing; life sciences/medical technologies; transport and logistics; low carbon environmental goods and services, creative, cultural and media and the visitor economy. Within each of these sectors, SELEP makes an important contribution to national output, employment and businesses.
- **Transport and Logistics** – SELEP identifies significant opportunity for growth in the transport and logistics sectors. The Plan fully recognises that smaller seaports in the area, as well as three smaller airports (including Manston Airport), also all offer further growth potential.
- **Creative, cultural, and media and the visitor economy** - the tourism sector is a significant sector in the SELEP area. The visitor economy is particularly important in SELEP's rural and coastal areas. SELEP makes the largest GVA contribution to the creative industries sector of any LEP outside of London and is in an excellent position to take advantage of opportunities to build up a supply chain for London, the world's leading creative centre.

8.29 In terms of Manston, paragraph 2.38 states that the area around Manston and Discovery Park contains extensive land suitable for residential and employment use, and is well connected by new infrastructure. The SELEP were seeking an extension of the designated Discovery Park Enterprise Zone for Manston following the airport's announcement to close with a Manston Airport task force to be established with local MPs.

8.30 The Discovery Park and Manston Growth Deal states that a coordinated approach to the development of Discovery Park and Manston needs to be taken forward and that the Kent and Medway Enterprise Partnership (KMEP) will :

- consider extending Enterprise Zone designation to Manston Business Park, Manston Airport and the Richborough Corridor. KMEP will ask Government to permit Thanet District Council to retain 100% of business rate receipts within the Zone with no impact on their baseline, in order that discounts can be fully funded by receipts above the discount level;
- allocate £3.5 million in Local Growth Fund finance to support commercial development at Manston and Discovery Park; and
- support SEFUND investment in commercial and residential development. Alongside this, KMEP will seek Local Growth Fund transport investment in Thanet Parkway station as a priority to reinforce the success of Discovery Park and support investment at Manston as well as in the Westwood Relief Strategy, eliminating a major bottleneck impacting on employment and commercial growth in Thanet Central Island.

South East LEP (SELEP) Strategic Economic Plan - Evidence Base (September 2017)

- 8.31 The next South East of England Local Enterprise Partnership (SELEP) Strategic Economic Plan is being prepared. An evidence base report has been produced and sets out the strategic priorities that will shape the next plan (which is due to be published in 2018).
- 8.32 One of the key strategic priorities for the new plan is to encourage trade and inward investment and in particular, encourage more international trade. The SELEP recognises that significant value can be achieved for the SELEP economy from encouraging more businesses to trade overseas and foreign owned companies to locate in the UK.
- 8.33 However, the report recognises that the smooth running of the SELEP gateways is something which desperately needs to be maintained, as the potential for significant delays being experienced at the borders, post Brexit, is not something that the evidence suggests either the SELEP or the national economy can cope with.
- 8.34 To achieve these ambitions, the report acknowledges that there needs to be an improvement in the SELEP productivity, and to do this, there needs to be an infrastructure upgrade including commercial property and transport infrastructure, and better alignment with central government infrastructure investment with local growth priorities – building on the Kent Growth and Infrastructure Framework (see below).
- 8.35 Paragraph 12.0.18 recognises that a number of ports in the SELEP region are also keen to expand to enable them to deal with increased heavy bulk freight. If the UK aspired to be a top international trading nation, encouraging and supporting port investment is vital according to the SELEP.

East Kent Growth Framework – the East Kent Growth Plan – Final Draft Report (2017)

- 8.36 The East Kent Growth Plan (2013) ‘*Open for Growth*’ prepared by the East Kent Regeneration Board has been replaced by The East Kent Growth Framework - Final Report – prepared by the East Kent Regeneration Board which was published in December 2017.
- 8.37 The East Kent Growth Framework (EKGF) sets out an overarching strategic approach for identifying investment priorities to achieve long-term economic growth across East Kent between 2017 and 2027. Four key objectives have been identified as the ‘building blocks’ for driving continued and sustained growth and focusing future investment across East Kent which are:
1. Unlocking growth through infrastructure - to enhance domestic and international connectivity while enabling local accessibility.
 2. Delivery of business space – to help attract new investment into the area while driving forward the development of brownfield sites.
 3. Supporting skills and productivity within business – ensuring that businesses have the skills to grow and that the skills base continues to improve (which is linked to the success of higher education and further education sectors creating talent).
 4. Place making and shaping – improve the perception of people’s idea of East Kent and make it a location of first choice that retains and attracts young people, families and entrepreneurs.

- 8.38 Given the extent of international connectivity, the report recognises that upgrading infrastructure within and around East Kent will also bring national benefits, with the effect that the potential return on investing in East Kent's infrastructure will be higher than elsewhere in the UK due to the sub-region's strategic location between mainland Europe, London and the rest of the country. The case for investing in strategic infrastructure is further strengthened by the UK's upcoming exit from the European Union and the potential impacts that post-Brexit border controls could have upon a number of locations in East Kent. However, Brexit may also offer opportunities for East Kent, such as growth in sectors associated with freight clearance and supply chain growth (paragraph 3.10).
- 8.39 Paragraph 3.11 states that maximising the opportunities for economic growth in East Kent requires thinking beyond the East Kent boundaries for transport infrastructure. For example, the Lower Thames Crossing is critical to facilitating future growth and improving productivity and resilience for businesses in the wider economy and will also impact on East Kent. At a national level, the Lower Thames Crossing provides a critical piece of infrastructure for enabling the effective transportation of goods from the UK to Europe and it is important that investment in Kent's strategic road infrastructure keeps pace to ensure that this route to market can sustain increasing volumes of traffic without adversely affecting the day-to-day operations of East Kent's business community.
- 8.40 A total of 36 projects have been identified as being strategically-significant for the future economic growth of East Kent. Thanet Parkway Station is identified as one such project. Improving connectivity is a vital step in unlocking growth potential and attracting the necessary investment and job opportunities for local people. In particular, the Parkway Station will provide significantly improved access to the former Manston Airport site.

Kent and Medway Growth and Infrastructure Framework (GIF) 2018 Update

- 8.41 The GIF has been prepared by Kent County Council (KCC) to provide a view of emerging development and infrastructure requirements to support growth across Kent and Medway. The GIF provides a strategic framework across the County, for identifying and prioritising investment across a range of infrastructure, for planned growth up to 2031.
- 8.42 The GIF recognises that Kent and Medway is the strategic gateway from the UK to continental Europe. It also acknowledges that Kent and Medway is facing increased congestion on both road and rail infrastructure £9.96bn is required for major transport projects including the Lower Thames Crossing and associated strategic road corridor through to the Channel ports, Crossrail extension to Ebbsfleet, a solution to Operation Stack and lorry parking. The GIF does not identify Manston Airport or aviation as a strategic transport priority for the county. Thanet Parkway Railway Station is identified as a priority rail project in the GIF.
- 8.43 The GIF identifies the Manston Airport/Stonehill Park site as an employment site (Figure 7.5: East Kent - example strategic projects for economic growth) and Thanet Parkway Railway Station as strategic priority.

Thames Estuary 2050 Growth Commission – 2050 Vision (June 2018)

- 8.44 The report sets out a vision and delivery plan for north Kent, south Essex and east London up to 2050. The Commission's analysis shows that the Thames Estuary could generate an additional £190

billion of Gross Value Added (GVA) and 1.3 million new jobs by 2050. It estimates that at least 1 million new homes will be needed to support this growth.

- 8.45 The Technical Report recognises that the Thames Estuary contains some significant transport infrastructure that supports the people and places within it. Manston Airport is identified as a smaller airfield which is now closed but which is the subject of plans for mixed use re-development as well as a development consent order for aviation uses.

- 8.46 The Commission's overarching objectives are as follows:

Productive Places

- 8.47 The places of the Thames Estuary will support the sustained growth of its high value, healthy wage sectors achieving up to 1.3 million new jobs by 2050. Existing sectors will be strengthened including freight and logistics and construction, maximising opportunities from existing assets such as the ports. Emerging sectors will be nurtured including: health, reflecting the supercentre in Kent; niche heritage and wildlife tourism in Kent and Essex; and the Thames Estuary Production Corridor - a ribbon of creative and cultural industries along the River Thames. In part and as a whole, the places will harness entrepreneurial spirit, strong educational institutions and unique natural assets to create a distinctive and productive network of economies

Connected Places

- 8.48 There will be improved connections between and within cities, towns, villages and industries be it for people or goods. This will support improved productivity through increased access to jobs and services. New and improved rail, bus, cycle and pedestrian links will reduce car dependency and increase the use of the area's integrated public transport systems. Completing the Thames Path will also improve connections for recreation for cyclists and pedestrians. The area will benefit from the highest level of digital connectivity, adopting the latest technological innovation. New river crossings such as the Lower Thames Crossing and Silvertown Tunnel will strengthen local and national links. New railway infrastructure including the extension of Crossrail 1 to Ebbsfleet and the Thames East Line will connect into the country's high speed network and complete the orbital railway around the Capital.

Thriving Places

- 8.49 The growing communities of the Thames Estuary, which will be home to 4.3 million people by 2035, will pride themselves on their rich cultural and economic activity. Through people-led projects - in part delivered through the Thames Estuary Fund - each distinctive city, town and village will be the well-loved heart of the community. They will demonstrate the importance of good design and creating attractive places that work for the community. Improved educational attainment and local skills will increase aspiration and show that new job opportunities are for them. These thriving places will be attractive to investors and will celebrate their individual sense of place by offering bespoke opportunities to live, work, visit and play within the Thames Estuary setting.

Affordable Places

- 8.50 A further 1 million high-quality homes, balanced to suit the affordable needs of the community, will be provided by 2050. They will offer a diversity of choice to all parts of the community, including

ageing populations, and ensure that supply keeps pace with demand. The production of statutory Joint Spatial Plans will set out where these homes will be located and include tools, such as design review panels, to ensure high-quality development is delivered. Healthy lifestyles will be supported by the provision of new social places alongside integration with existing places and community networks. This will support resilient communities that respond to the needs of residents throughout their lives.

Adaptable Places

- 8.51 The many places and spaces in the Thames Estuary will adapt to the changing environment ensuring the people, economies and ecology of the area thrive. Infrastructure investment will be integrated and multi-functional, maximising the benefits to people, places, and ecology. This will assist in the creation of nearly 900 hectares of new habitat by 2100 to replace the 1,200 hectares lost to tidal flooding. Projects such as the completion of the Thames Path will provide improved access to the natural environment. The use of natural assets for recreation and economic activity will be balanced with their protection and enhancement.

Deliverable Places

- 8.52 The Thames Estuary will complete what it has started; delivering the homes and the balanced jobs it has planned, at the required scale and pace, in order to create thriving and affordable places. This will be achieved through robust, locally-led governance structures, which build on existing partnerships and bring together, as needed, the 18 local authorities, plus the three upper tier authorities. The area will also be a space to try something - a place that supports innovative models of delivery be that through capitalising on Modern Methods of Construction (such as modular homes) or innovative models of public sector housing delivery. Across the many places of the Thames Estuary this will enable the significant aspirations to become meaningful realities.

- 8.53 Thanet is located within the North Kent Foreshore area. The Commission's vision for North Kent Foreshore is:

“At the heart of a new medical research corridor, North Kent Foreshore will be home to a supercentre of health and wellbeing. Through a statutory Joint Spatial Plan, and strong connections between local government and business, the area will balance delivering growth in the health sector with new jobs, new homes, a renewed focus on skills, and high-quality town centres set around world-class heritage and natural assets.”

- 8.54 The Commission recognises that there are significant opportunities for growth and development in North Kent Foreshore. Their Priority Areas of Change (pages 24 and 25) in the North Kent Foreshore area include Canterbury, Margate and Ramsgate. It has identified three priorities as follows:

- North Kent Foreshore Fund
- Education and Skills
- Health Supercentre

- 8.55 Specifically in relation to education and skills, the Commission states that it wants to implement a more targeted skills strategy with employers and educational institutions that provides clear pathways

to employment that support the area's existing and growing economic sectors. This is to address generational skills shortfalls. It will improve educational attainment and skills in the area, across multiple age groups, therefore reducing levels of unemployment. The aim is for Kent County Council to work with the local authorities, the Local Enterprise Partnership, employers and/or educational institutions to develop a targeted plan for the area, which meets current and future employer needs. It is clear that reopening Manston Airport will help to achieve this priority in addition to helping to achieve the overarching objectives for the 2050 Vision. It will also stand to benefit from many of the initiatives that are being brought forward not least by improving connectivity and generating productive places.

Summary

- 8.56 Regionally, both historically and even to the present day, the regional opportunity presented by a successful Manston Airport has always been recognised. Reopening Manston Airport will undoubtedly accelerate growth and jobs in the area which have been suffering and especially in the East Kent area. It will transform connectivity for businesses and residents and boost business productivity for the region. Job creation, and especially with RiverOak's commitment to employ local people where possible, will improve skills. Reopening Manston will build on the established economic strengths in the region by providing another 'gateway to the world'; strengthening the entrepreneurial business culture; building on the success of universities in the area and innovation whilst also enhancing opportunities in the aviation sector; realising the significant opportunity for growth in the transport and logistics sectors in the region and boosting the creative, cultural, media and visitor economy. It will also help to address the higher than average unemployment levels especially in the region's coastal communities – most notably in Thanet where the SELEP records a 12.3% unemployment rate and in this way, help to rebalance the economy.
- 8.57 The area around the airport is already well connected by infrastructure and includes significant amount of employment land which could support airport-related and other businesses with a preference for being located close to the airport – especially if SELEP's plans for Enterprise Zone status at Manston Airport are realised in the interests of supporting and attracting commercial development, inward investment and international trade – key regional objectives.
- 8.58 The regional agenda realises completely that infrastructure upgrades in the area including very specifically, transport infrastructure, needs to be better aligned with local growth priorities. This is where reopening Manston Airport will unlock real potential and opportunity for growth and this is a very significant benefit to arise from the development proposals. The Thanet Parkway Station proposals will enhance accessibility to the airport.
- 8.59 Very importantly, reopening Manston and the benefits that will arise from this, will improve the perception of people's idea of East Kent and make it become a location of 'first choice.' With Brexit, a successful airport at Manston will offer significant opportunities for East Kent associated with freight clearance and supply chain growth which due to the sub-region's strategic location between mainland Europe, London and the rest of the country, offers real potential.
- 8.60 The regional benefits that will arise from the Proposed Development should not be underestimated or understated. The catalytic effects of reopening the airport have the potential to transform the region through addressing many of the region's problems but equally strengthening the many positive

characteristics. This is a significant benefit of the proposal which should attract significant weight in the decision making process.

e) County Fit'

A Vision for Kent 2012-2022 by the Kent Forum (2012)

8.61 This statement outlines the challenges facing Kent and the priorities for the county. It lists three ambitions as follows:

- **Ambition 1: To grow the economy** - For Kent to be open for business with a growing and successful economy and jobs for all. Kent's future prosperity is dependent upon a thriving business sector that generates wealth. A strong, diverse and resilient economy is the glue that holds our communities together, giving individuals opportunities and putting money in families' pockets. A successful economy is fundamental to the second of our ambitions - to tackle disadvantage. The commitments are to:
 - To deliver the critical infrastructure that will create the conditions for economic growth across Kent;
 - To raise the career aspirations of Kent's residents, from early years through to adulthood, and to meet those increased aspirations with a range of learning opportunities, apprenticeships and internships that meet future business need.
 - To be business friendly and the county of choice for inward investment and expansion.
- **Ambition 2: To tackle disadvantage** - For Kent to be a county of opportunity, where aspiration rather than dependency is supported and quality of life is high for everyone. The commitments are to:
 - To reduce the number of Kent residents on out-of-work benefits.
 - Inspire young people to become engaged in their families, schools and communities, so they take full advantage of all the learning, recreational and development opportunities (including volunteering), that are a foundation for achieving their lifelong potential.
 - To ensure there is choice of high quality and accessible services that will tackle disadvantage.
- **Ambition 3: To put citizens in control** - For power and influence to be in the hands of local people so they are able to take responsibility for themselves, their families and their communities.

Facing the Aviation Challenge – Kent County Council (August 2014)

8.62 This document set out Kent County Council's (KCC) reasons for opposing the proposals for an airport on the Isle of Grain, which the Airports Commission investigated in 2014 and it presented KCC's view on UK aviation.

8.63 KCC is of the view that the UK needs to be able to connect with emerging markets now, in time to stop the UK's continued slide against its competitors, and the quickest way of addressing this is to

build on our current aviation infrastructure (rather than building a new multi runway hub airport in the Thames Estuary).

- 8.64 If additional runway capacity is not provided in anticipation of forecast demand growth, KCC are concerned that *“delays and disruption at London’s airports will steadily worsen and there is no room for connectivity growth to new markets. As a result, the UK will become less accessible than its rivals to strategically important locations in the world economy and the UK’s future economic prosperity will be threatened. With the current UK economic situation, it is all the more important that this industry, so vital to our country’s economy, is invested in, protected and expanded to meet growing needs. In the interests of the national economy the need to act is now.”*
- 8.65 In the document, KCC confirmed that it fully supports growth in UK aviation in order to improve the UK’s connectivity and competitiveness, thus supporting economic growth and job creation.
- 8.66 The right solution to addressing capacity needs in KCC’s view is to utilise, improve and expand existing airports. It felt that provision of additional capacity at some existing airports, together with improved surface access by rail will facilitate better strategic use of the London/South East multi-airport system. KCC felt that better utilisation of regional airports such as London Ashford Airport at Lydd in Kent and London Southend Airport, for point to point flights, will also release extra capacity and complement the main London airports that provide ‘hub’ operations. This also provides a solution to the capacity problem in the short and medium term while new runways are constructed at the main London airports over the longer term.
- 8.67 KCC recognise that regional airports also have a role, as demonstrated by the available capacity at Southend Airport where significant private sector investment has already taken place. Development of a new Lower Thames Crossing to the east of Gravesend will improve access from Kent and will further enhance the airport’s prospects. Similarly, at Lydd Airport in Kent, private investment is forthcoming.
- 8.68 Following its closure as a commercial airport in May 2014, KCC recognised that a financially viable and sustainable future must be found for Manston airport and that this should focus on the use of the site for aviation and related services as well as other businesses that can bring jobs and economic growth to East Kent.

Kent County Council – Manston Airport under private ownership : The story to date and Future Prospects (March 2015)

- 8.69 This document sets out the story of Manston Airport from its sale by the Ministry of Defence to the present day. Kent County Council also considers the future for the airport which it is confident will be bright. The document confirms that the Council has always supported Manston and they have invested substantial sums of public money to the cause. They have also made substantial investments in both road and rail infrastructure to improve access to Manston and East Kent.
- 8.70 The document confirms that the County Council remain committed to seizing the best opportunity for Manston Airport by creating a significant number of new jobs and bringing prosperity into East Kent.

Kent County Council Position Statement on Manston Airport (July 2015)

- 8.71 The County Council’s position as set out in the meeting of the County Council on 16th July 2015 is:

“That we the elected members of KCC wish it to be known that we fully support the continued regeneration of Manston and East Kent and will keep an open mind on whether that should be a business park or an airport, depending upon the viability of such plans and their ability to deliver significant economic growth and job opportunity.”

Local Transport Plan for Kent 4: Delivering Growth without Gridlock 2016-2031 (2017)

- 8.72 In terms of countywide priorities, KCC confirms that its position on aviation is as set out in ‘Facing the Aviation Challenge’ which is to maximize use of existing regional airport capacity, along with some expansion of existing airports and improved rail connections. In respect of Manston Airport, the plan recognises that it ceased to operate on 15th May 2014 and that the County Council’s position as set out in the meeting of the County Council on 16th July 2015 (see above).
- 8.73 KCC state that processes are needed to properly measure, minimise and mitigate the noise impacts of existing airport operations and airport expansion. They oppose a second runway at Gatwick; one of the reasons for this is the doubling of the already unacceptable noise impacts. KCC state that there needs to be an immediate reduction in overflight and noise in West Kent and so they oppose proposed airspace changes that would not share the burden of overflight equitably between communities. They state that multiple arrival and departure routes should be used to provide periods of respite.
- 8.74 In light of the County Council’s long-term aviation capacity issues, they are pressing Government for immediate action to keep UK airports competitive with European airports in terms of Air Passenger Duty (APD). KCC recognise that this currently has a negative impact on the UK’s global connectivity and is therefore damaging UK business and tourism. The Council recognises that differential charging of APD at uncongested airports could also help to stimulate growth at regional airports and free up capacity at congested airports.
- 8.75 The County Council is also seeking to deliver a new railway station to significantly improve rail connectivity to the area (Thanet Parkway Rail Station). The station will provide access to greater employment opportunities for local residents, and increase the attractiveness for investment in Discovery Park Enterprise Zone and numerous surrounding business parks in Thanet. It will also support local housing and any reopened airport at Manston. KCC recognises that East Kent has a real opportunity for growth but is currently beyond an hour’s journey time from London which discourages employers from location in the area. As regeneration in East Kent is dependent on improving accessibility, the new Parkway Station is proposed to enhance the accessibility of the wider area of East Kent.

Summary

- 8.76 Kent County Council wants to grow the economy and ensure that there are jobs for all in addition to tackling disadvantage and raising the career aspirations of Kent’s residents. The Proposed Development will assist to achieve all these objectives and especially in the East Kent area where unemployment levels are higher than average.

- 8.77 In terms of its position on Manston, Kent County Council's Position Statement (July 2015), which was made after the airport closed, remains valid. Even with the airport being closed, the County Council make it clear that they are still supportive or regenerating Manston and East Kent including for an airport provided such plans are viable and that they will deliver significant economic growth and job opportunity. It is clear from the documents provided with the DCO and especially the Azimuth Associates Report [document reference: TR020002/APP/7.4] that the Proposed Development will result in a viable and successful aviation business that will deliver significant direct, indirect and catalytic economic growth and job opportunities on a large scale.
- 8.78 It is clear from the County Council's response to the Airports Commission in 2014, that they fully recognise the importance of aviation and additional airport capacity to the economy (which they say is 'vital') and the need for the UK to maintain a competitive position in terms of connectivity especially in light of the fact that the UK is losing out to its competitors in this regard. The County Council believes that the correct solution to addressing capacity needs is through utilising, improving and expanding existing airports. In this sense, the Proposed Development 'fits' well with the County Council's preferences. Furthermore, and again with direct 'fit' to the County Council's preferred position, reopening Manston Airport will make better use of regional airports which will release extra capacity and complement the main London Airports. With private investment, and alongside developments including the new Lower Thames Crossing and the new Thanet Parkway Station, the County Council fully recognises that Manston as a regional airport, could play a significant regional role.
- 8.79 Kent County Council have been responding to the non-statutory and statutory pre-application consultations and engaging with RiverOak's technical team in terms of preparing the ES. This engagement continues and there will be a Planning Performance Agreement (PPA) in place to enable this to continue post-submission of this DCO.

f) Local Fit'

Thanet Destination Management Plan (2013)

- 8.80 Thanet District Council set out a number of objectives to attract more visitors. These objectives include:
- Make more of its location – the Isle, the big skies, the natural coastline and importantly its proximity to London by high-speed train and the market opportunities that bring.
 - Ensure tourism is one of the drivers of the local economy and put steps in place to enable that, including supporting tourism business sustainability, growth and inward investment.

UKIP Manifesto – Policy Pledges (2015)

- 8.81 UKIP won the local Council elections in Thanet 2015 on the back of a promise to reopen Manston Airport. This demonstrated significant local support for bringing back the airport into aviation use.

Thanet District Council Corporate Plan 2016-2020 (2016)

- 8.82 The Corporate Plan for Thanet sets out the Council's aspiration to grow the local economy so that Thanet can thrive. Priority no. 3 is to promote inward investment and job creation. The Plan states that the Council's vision is to:

“ ..accelerate growth and achieve greater economic prosperity for our district. We will seek opportunities for inward investment, high quality job creation and work with partners to ensure we have the right skills, infrastructure and plans in place.

This will involve us:

- **Actively seeking inward investment, exploring the potential for using Enterprise zones encouraging new and existing businesses which support growth in the local and visitor economy.**
- **Working with partners to make the most of the buildings and land we own. Maximising commercial opportunities for key assets.**
- **Writing a Local Plan which sets planning strategies and policies that support growth of the economy.**
- **Working with education and training providers to develop the skills agenda for the benefit of residents and local businesses.”**

Draft Thanet Transport Strategy 2015 to 2031 (October 2017)

- 8.83 Section 5.7 relates to Thanet Parkway Rail Station and states that the County Council's Transport Delivery Plan identifies key opportunities and challenges to be addressed to deliver long-lasting regeneration and economic growth in the County. It recognises that many of Thanet's existing rail stations are difficult to reach by sustainable transport and offer limited car parking opportunities. This causes some commuters to travel significantly longer distances by car to access stations with better parking facilities. The new station project's objective is to support growth at Manston, Business Parks around Westwood and Discovery Park. The following outcomes are expected from the delivery of the station:

- Increased inward investment in Thanet and Dover.
- Thriving Enterprise Zone and surrounding Business Parks.
- Greater employment opportunities for Thanet and Dover residents.
- Access to high speed rail services across district.

- 8.84 The new station will deliver 'headline' opportunities as follows:

- Improved air quality; reduced congestion; reduced noise pollution; and less carbon emissions;
- £10m funding from Government (with every £1 that is invested to generate more than £2.12 in benefits);
- Reduce the perceived remoteness of Thanet from London;

- Improved connectivity to the wider job market;
- Quicker journeys to London, Ashford and wider Kent; and
- An integrated transport package will be delivered.

- 8.85 It is anticipated that journey times from London to the Thanet Parkway would reduce to 1 hour, providing a significant boost to tourism, and regeneration of the area and enhancing access to private sector employment at Ashford and Ebbsfleet.
- 8.86 The report also identifies a 'traffic challenge' at the B2050 / B2190 - Spitfire Junction which is recognised as a very important local route with the A299, which is one of the primary arterial routes serving Thanet, for locally bound traffic to Margate, Broadstairs and Ramsgate. The Council explain that several designs have been considered at this junction to seek to improve junction performance and safety, however the alignment of the carriageway of the B2050 and the availability of residual highway land currently present geometrical challenges to an alternative approach.
- 8.87 The Strategy identifies the Former Manston Airport site as a key development site in the new Thanet Local Plan and states that it is essential that redevelopment of this site positively contributes towards wider off site road links, in order to manage potential impacts on the surrounding highway network such as Manston Village and Manston Court Road. Manston Court Road (between Valley Road and the B2050 Manston Road) will require significant improvements to widen the carriageway to form a local distributor road.
- 8.88 It is anticipated that a new highway link would be created on the existing Northern Grassland (part of the Former Manston Airport Site allocation). The nature and route of this link will depend on the final masterplan for the site. It will be necessary for developers of both the Former Manston Airport Site and Land Adjacent to Manston Court Road to make significant improvements (or financial contributions if deemed appropriate) towards the road network surrounding the site allocations. These would include the upgrade of Manston Court Road as a direct link to and from Westwood and new / improved links to the existing dual carriageway on Spitfire Way fronting Manston Business Park.
- 8.89 Spitfire Junction will need to be reconfigured to address existing capacity and safety concerns and access to this junction from the A299 will need to be controlled or restricted to avoid excessive use of Manston Road for Margate Bound Trips.

Thanet Draft Infrastructure Delivery Plan (November 2016)

- 8.90 The plans for a new Thanet Parkway rail station are listed in the schedule of key local plan infrastructure. The new station will have 300 parking spaces and will be located at Cliffsend and will include plans for sustainable travel links to the new station.

Economic Growth Strategy for Thanet (November 2016)

- 8.91 The strategy recognises that Thanet has a distinctive local economy with substantial opportunities for sustainable and high quality economic growth - particularly with HS1 in place, Thanet now has significant locational advantages deriving from its proximity to both London and continental Europe. Looking ahead, the strategy recognises that there is real potential linked to the port and historic

marina at Ramsgate and emerging opportunities in the fields of advanced manufacturing, agri-tech and the creative sector. While there are some challenges – relating particularly to the creation of jobs locally and workforce skills – the opportunities are real ones, particularly in the wider context of significant planned housing and population growth.

8.92 The Economic Vision for Thanet is:

“Thanet is a great place to live, work and invest, rivalling its counterparts across the UK. Its economy will grow quickly in both relative and absolute terms.

Transformational Initiatives

- 1: Developing the Port at Ramsgate**
- 2: Investing in high value manufacturing and engineering across Thanet and East Kent**
- 3: Positioning Thanet as a global agritech hub**
- 4: Promoting Thanet’s broader cultural/leisure offer**
- 5: Cultivating the creative industries across Thanet**
- 6: Designing enterprise into communities**
- 7: Long term feasibility modelling for Margate and Ramsgate**

Foundational Priorities

- 1: Working with businesses, schools and FE/HE providers to improve workforce skills**
- 2: Developing and implementing measures to support new and small businesses in the District, particularly the provision of managed workspace and focused business support**
- 3: Ensuring major employment sites in Thanet are managed and promoted effectively**
- 4: Working with local partners to ensure that the visitor economy continues to evolve, reflecting fast-changing patterns of demand.”**

8.93 Data suggests that the local economy which is “on the up” with businesses choosing to invest in Thanet, and people are choosing to live and work there. The strategy recognises that there continues to be many challenges. The skills profile could be strengthened; too many jobs are “low wage” and part time in character; and the number of jobs within the District needs to grow. There is also a need to diversify the business base so it is less reliant on ‘public sector’ type roles (36% in health, education and public administration).

8.94 Inland, the strategy recognises the Manston Airport site is a serious potential opportunity for Thanet’s economy going forward. It recognises that as part of the Local Plan process, Thanet District Council will be required to make a decision in relation to the future use of the site for the future direction of economic growth District-wide.

8.95 The strategy identifies Thanet's economic strengths but also its threats and weaknesses which are summarised as follows:

- A need for further investment in workforce skills;
- Viability and developer challenges in the successful delivery of new development or relocation of existing businesses on major employment sites;
- A tourism sector which is important to the area, and where growth in private investment in recent years needs to be supported and developed further. Hotels are at capacity at peak times and a lack of high quality accommodation;
- Towns in need of a more clearly defined economic purpose; within specific areas / zones;
- Increased competition and market challenges are impacting upon town centres – which in the context of fast changing public expectations requires a renewed focus;
- Ongoing uncertainty surrounding the future of the former Manston Airport site;
- Uncertainties linked to the process of Brexit;
- Despite growing confidence within the area, there are still some external perception issues to be addressed; and
- A Local Enterprise Partnership that is becoming more complex and competitive and where Thanet needs to promote its priorities and justify its “asks”.

Saved Manston Airport policy in the adopted Thanet District Local Plan (2006)

8.96 The proposals for development fit entirely with objectives that underpin the Local Plan especially as there is an emphasis on employment development at the airport and ultimately, on adjacent business parks thereby strengthening and broadening the area's economic base (Chapter 1).

8.97 The proposals will also help to deliver the economic development and regeneration objectives set out in Chapter 2, namely by delivering sustainable growth and diversification in economic activity; delivering employment generation to address the high levels of unemployment and to take advantage of the locational opportunities that the district has with Europe and raising local GDP.

8.98 Policy EC2 (Kent International Airport) was found by the Inspector in the Lothian Shelf Limited appeals to carry significant weight in the overall planning balance (paragraph 19) because it accorded fully with the Government's Aviation Policy Framework. This policy is fully supportive of development at the airport including its expansion and diversification. Policy EC4 (Airside Development Area) reserves land north of the runway and including the land north of the B2050 (the Northern Grass) for airside development purposes. Airside development is defined as uses with an operational requirement for direct access to aircraft and therefore dependent on a location immediately adjacent to the runway or capable of direct access to it via taxiways. This includes uses based on operation of passenger handling services; air cargo operations related to the site; operation of aircraft maintenance and manufacturing and services ancillary to the maintenance and operation of the airport. The proposals for development as illustrated on the proposed Masterplan are fully compliant with this policy.

- 8.99 The proposals will similarly help to deliver the transportation objectives of the Local Plan which include promotion of safe and efficient transport systems that support sustainable economic regeneration and enabling Thanet's citizens to conveniently access services and facilities (Chapter 5).
- 8.100 Policy T1 relates to tourism and states that planning permission will be granted for development which would extend or upgrade the range of tourist facilities, increase the attraction of tourists to the area or extend the season. The proposals for development by including some passenger services will help to achieve this policy objective.
- 8.101 The policies referenced above are provided in Appendix 5 of this statement in addition to Appendix 4.1 of the ES [document reference TR020002/APP/5.2-4] along with the other policies in the adopted Local Plan that are relevant to the determination of this application.

APPENDIX 5

Emerging Manston Airport policy in the draft new Thanet District Local Plan

- 8.102 Following Proposed Revisions to the draft Local Plan which were published in January 2017 and which identified the Manston Airport site a mixed-use settlement for at least 2,500 new dwellings and up to 85,000m² of employment and leisure floorspace under Policy SP05 (Former Airport Site), an Extraordinary Meeting of the Council on 18th January 2018 voted not to progress the draft Local Plan due primarily to the proposed change of designation to the former Manston Airport site. This followed a significant number of consultation responses that were submitted by those who opposed the designation change and who wanted the airport site to be retained for aviation-related uses.
- 8.103 The Council is continuing work on its draft Local Plan and has made a call for further development sites. The Council have confirmed that they will need to identify suitable alternative sites/locations for housing to meet the identified objectively assessed need for the District which will require as a minimum:
- A review of the sites previously submitted for housing and a further call for sites to seek to identify any more suitable sites/locations.
 - Identification of sites/locations to accommodate the 2,500 dwellings displaced from the airport site and (depending on whether the Government's proposed changes to housing methodology is confirmed) identification of sites/locations to accommodate an additional 3,090 dwellings.
- 8.104 On 16th November 2017, Sajid Javid MP – the Secretary of State for Communities and Local Government (now Housing, Communities and Local Government) wrote to the Leader of Thanet District Council to express his concern about the lack of progress that the authority had made on its Local Plan making and threatening intervention in its plan making process. The Council responded in a letter dated 31st January 2018 to explain the decision of the January 2018 Extraordinary Council meeting. Sajid Javid MP wrote again to the Council on 23rd March 2018 to confirm that he would continue with the intervention process with Thanet District Council. At the time of writing, it is believed that the report of the Ministry for Housing, Communities and Local Government (MHCLG) advisors has been submitted to MHCLG, but it is not known what recommendations will be made to the Minister, or when the Minister will make a decision on any further action on those recommendations.

- 8.105 In July 2018, a series of Cabinet, Overview and Scrutiny and Full Council meetings were taking place to seek Members' views on the next steps to be taken with the draft Plan with a view to moving the Plan forward towards publication for comment under Regulation 19 of the Town and Country Planning Act (Local Planning) (England) Regulations 2012 with subsequent submission of the Plan for examination under Regulation 22.
- 8.106 Unless robust evidence is provided to the contrary, the expectation is that the draft new Local Plan for Thanet will progress, with Government intervention, on the basis of continuing to protect the Manston Airport site for aviation use and safeguarding land for this purpose. The proposals for development will fit entirely with the Council's preferred strategic position for the future of Manston Airport.
- 8.107 The policies referenced above are provided in Appendix 5 of this statement in addition to Appendix 4.1 of the ES [document reference TR020002/APP/5.2-4]. Whilst regard has been had to the policies in the draft new Thanet Local Plan that do not relate to the Manston Airport site, no weight has been attached to them in the planning assessment of the proposals. This is because it is still very early days in the development of the new Local Plan; there are lots of outstanding objections to the Consultation Drafts that still need to be resolved and the policies could change especially given the Full Council's decision 18th January 2018.

APPENDIX 5

Summary

- 8.108 The proposals to reopen Manston Airport are entirely in accordance with the saved land use policies governing the airport site in the adopted Thanet District Local Plan which safeguard the airport for airport uses. Significant weight is to be attached to these policies which remain up-to-date with national aviation and planning policy (as confirmed by the appeal decision into the Lothian Shelf Limited appeals – see Appendix 4). The adopted Local Plan places an emphasis on employment development at the airport and on adjacent business parks to strengthen and broaden the area's economic base. The proposals for development will create a significant employment destination at Manston which will help to deliver many other local strategic economic and regeneration policy aims.
- 8.109 The position with the emerging new Thanet Local Plan insofar as it relates to Manston Airport has reached a pivotal point in the sense that the Council, with a new Leader, is promoting airport uses once again at the site (and not a new mixed-use settlement). There is every expectation that the proposals for development will accord fully with the new policies to emerge as part of a revamped new Thanet District Local Plan. Since the new Leader has been appointed, engagement with Thanet District Council has improved and they are more willing to discuss RiverOak's proposals and how they can deliver on the many local strategies and policy objectives. The change in approach at the Council is very reflective of the local support for reopening Manston Airport as evidenced in the feedback received to the statutory consultation events (see Consultation Report – document reference TR020002/APP/6.1).
- 8.110 As evidenced in Volume 4 (Section 6) of the Azimuth Associates report, the proposals for development and creating a vibrant airport in the region will support tourism in the area and will increase demand for visitor accommodation across Thanet. In this sense, the proposals 'fit' very well

in terms of achieving the objectives of Thanet's Destination Management Plan which looks to tourism as one of the drivers of the local economy.

- 8.111 Volume 4 further demonstrates how the proposals for development will bring significant economic and social benefits to the local economy, to job creation and to education and training in addition to tourism. In this sense, the proposals will directly help Thanet District Council to achieve its Corporate Plan aspirations to accelerate growth and achieve greater economic prosperity for the district through inward investment and attracting new businesses; creating jobs; ensuring that the right infrastructure is in place and working with education and training providers to develop skills for residents and local businesses.
- 8.112 The proposals for Thanet Parkway Station will be helpful to the Proposed Development in that it will mean that journey times to London will be less than one hour. This will mean that the airport is well connected to London for passengers thereby improving connectivity to the capital. The proposals for development which include highways improvements to the Spitfire Way junction with the B2050 and widening of Manston Court Road will bring benefits to the local highway network in line with aspirations set out in the draft Thanet Transport Strategy. At the time of writing, an application for planning permission for the new station had been submitted to Kent County Council and was awaiting validation (application reference KCC/TH/0105/2018).
- 8.113 The Proposed Development will also help to realise the economic vision and initiatives set out in Thanet's Growth Strategy (2016) particularly through establishing links with the port at Ramsgate especially in terms of tourism opportunities and through opportunities in the fields of advanced manufacturing where the aviation sector has a key role to play in terms of logistics. It will broaden Thanet's leisure/tourism offer and through creating job opportunities also bring the opportunity for improving workforce skills and training/education. The proposals represent a serious opportunity for growing Thanet's economy
- 8.114 The proposed development will give East Kent and Thanet a real purpose. Since the closure of certain large businesses including Pfizer and the airport itself, there has not been a real economic purpose to the area. Reopening Manston Airport will fill this void and reduce the uncertainty surrounding the use of the redundant site. This will boost confidence in the local area which in turn will tackle some of the negative perception issues.

g) Conclusion – does the Proposed Development Fit

- 8.115 It is clear from this assessment that the Proposed Development 'fits' entirely on a regional, county and local level and across a whole range of strategic topics – and that this 'fit' and the benefits to arise from it have historically and consistently been recognised in policy and strategy documents. A successful airport business at Manston will perform a vital role for the region. In many instances, it will be the key that unlocks many of the strategic aspirations and policy objectives and the catalyst to really transforming East Kent through growing the economy, creating jobs, creating opportunities for investment including in workforce skills and training and boosting Thanet's tourism and cultural/leisure offer. In many respects, reopening Manston Airport is the last real and serious potential opportunity for Thanet/East Kent's economy going forward. An opportunity that strategic and local policies fully recognise.

9 PLANNING ASSESSMENT

a) Context

- 9.1 The determination of this DCO application will be made in the absence of a directly applicable Airports NPS in accordance with Section 105 of the Planning Act 2008. A decision on the application can be taken on this basis and needs to be taken by the Secretary of State who must have regard to any LIR; any matters prescribed in relation to development of the description to which the application relates, and any other matters which the Secretary of State thinks are both important and relevant to the Secretary of State's decision.
- 9.2 Further in the absence of a directly applicable NPS, this DCO application needs to be made in accordance with the Government's National Policy on Aviation as contained within the Aviation Policy Framework (APF). The APF sets out Government's high-level objectives and policy on the impacts of aviation.
- 9.3 The APF recognises that aviation benefits need to be balanced against its local impact. It reaffirms that the Government believes that aviation needs to grow, delivering the benefits essential to economic wellbeing, whilst respecting the environment and protecting quality of life but that the right balance needs to be struck to ensure that the UK's long-term economic prosperity is safeguarded. It therefore follows that a balanced view needs to be reached in making decisions on whether to support specific airport developments and that development which achieves the Government's aviation policy objectives should be strongly supported.
- 9.4 Section 6 of this statement sets out the Government's objectives and policies on the impacts of aviation and the framework within which decisions on aviation are to be made to deliver a balanced approach to securing the benefits of aviation and to support economic growth. These are considered in detail in this section of the statement against the assessment principles set out in the Airports NPS with reference to the Environmental Statement that has been prepared in support of the application.
- 9.5 Ordinarily, and in a situation where there is an applicable NPS, strategic and local policy itself is unlikely to be determinative when it comes to consideration of a NSIP. There is no specific obligation on the Planning Inspectorate within the Planning Act 2008 to consider the terms of the Development Plan although such policy is likely to be considered 'important and relevant.'
- 9.6 The Planning Inspectorate is required to have regard to any Local Impact Report (LIR) produced by the relevant local authorities – a report in writing giving the details of the likely impact of the proposed development on the authority's area (or any part of that area) – but local authorities can determine the content of their own LIRs and this may include reference to Development Plan documents. The Planning Inspectorate's guidance is clear that the LIR should be used by local authorities as a means by which their existing body of local knowledge and evidence on local issues can be fully and robustly reported to the Planning Inspectorate (Planning Inspectorate Guidance Note 1). Consequently, it is the local impact of the NSIP which is of principal interest to the Planning Inspectorate rather than the requirements of local planning policy. If Development Plan policy cannot set tests or requirements for the Planning Inspectorate to apply in determining development consent applications, its role is therefore limited.

b) Environmental Statement

- 9.7 This describes the likely significant effects of the project on the environment. Schedule 4 to the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 sets out the information that should be included in the environmental statement. This includes a description of the likely significant effects of the proposed project on the environment, covering the direct effects and any indirect, secondary, cumulative, short-, medium- and long-term, permanent and temporary, positive and negative effects of the project, and also the measures envisaged for avoiding or mitigating significant adverse effects. The Environmental Statement (ES) considers the effects of any changes in operations, including the number of air traffic movements, during the construction and operational phases assuming various current baseline positions – but none which assume any aviation activity previously associated with the airport when it was in operation and prior to its closure in May 2014. The ES also make reference to appropriate mitigation that will be secured for any significant effects.

c) Approach to Planning Assessment

- 9.8 Each of the topics considered in this section of the statement has been the subject of its own detailed assessment whether it is part of the Environmental Statement or the subject of a standalone assessment or report. This Planning Statement therefore draws from those assessments and presents their conclusions in the context of the key national, regional and local planning policies as set out in earlier sections of this statement which are considered to be ‘important and relevant’ to the Secretary of State’s decision (Section 105(2) of The Planning Act 2008) in the absence of a relevant NPS, but especially those policies contained in the following:

- Saved policies in the adopted 2006 Thanet District Local Plan
- NPPF 2012 (and where relevant, the NPPG and the draft changes to the NPPF as published in March 2018 appreciating that very little weight can be attached to these draft changes which are still the subject of a very early stage of consultation)
- Aviation Policy Framework (March 2013)
- ‘Beyond the Horizon : The Future of Aviation in the UK’ (July 2017) – a consultation on the new Aviation Strategy White Paper
- The Airports NPS (June 2018) and especially Section 4 (Assessment Principles) and Section 5 (Assessment of Impacts)

- 9.9 In considering each topic, the emphasis has been on identifying whether there are adverse impacts expected as this is relevant to take into account when considering the overall planning balance and whether there is sufficient adverse effect to outweigh the granting of development consent given the strong need for the proposed development. The topics that are considered are those set out in the APF and the Airports NPS and are as follows:

- Supporting economic growth and the benefits of aviation (including job creation and other socio-economic benefits)
- Climate Change Impacts/Adaptation

- Noise
- Air Quality
- Biodiversity and Ecological Conservation
- Landscape and Visual
- Built Heritage/Historic Environment
- Water Resources (including Flood Risk)

9.10 In addition, and with reference to the likely local impacts (see below) this section also considers the following topic areas:

- Traffic and Transportation/Surface Access
- Land Quality
- Health and Wellbeing
- Major Accidents and Natural Disasters and Security
- Resource and Waste Management
- Common Law Nuisance and Statutory Nuisance
- Community Compensation

9.11 To assist understanding of all the mitigation measures that are being proposed as part of this DCO application, a Register of Environmental Actions and Commitments has been produced and is provided [document reference TR020002/APP/2.5]. This sets out on a topic-by-topic basis, what embedded mitigation has been provided as part of the design for the Proposed Development and what additional mitigation is proposed to avoid, reduce or compensate for the significant environmental effects that have been identified.

Understanding the likely local impacts

9.12 The project has benefitted from some input from Thanet District Council to understand the likely impact of the Proposed Development on the authority's area. The Council responded to the statutory consultation carried out in June/July 2017 in a letter dated 20th July 2017 to highlight the relevant issues. They can be summarised and responded to (in part – see Consultation Report document reference TR020002/APP/6.1 for full response) as follows:

- **Principle and policy conflict** - the proposed redevelopment of the Manston Airport site as a dedicated freight airport with additional uses would be directly contrary to the emerging Local Plan (to 2031) Policy SP05, which allocates the site for a mixed use development with the capacity to deliver at least 2,500 new dwellings and up to 85,000sqm employment and leisure floorspace.

Response – Thanet District Council's Full Council rejected the emerging Local Plan on 18th January 2018 principally because it did not safeguard the Manston Airport site for airport uses.

The new Local Plan is being revised to no longer allocate a new mixed-use settlement on the Manston Airport site. The Proposed Development remain entirely in accordance with the saved policies in the 2006 adopted Thanet Local Plan that safeguard the Manston Airport site for airport uses.

- **Business Case** – the outline Business Case is deficient. The resource implications of both acquiring the land and implementing the project will need to be provided in the full submission, including outlining the degree to which other bodies have agreed to make financial contributions or to underwrite the scheme to fill any shortfall, and on what basis such contribution or underwriting has been made. Without this information there is significant uncertainty about the delivery of the project.
- **Economic Case** - without any information about who is going to deliver the freight tonnage and therefore create the job numbers stated there are questions as to whether the economic benefits of the airport in terms of job creation can be considered deliverable. In turn this uncertainty raises questions about the significance of the beneficial socio-economic impacts from the development.
- **Housing Requirements** - the implications of proposed job creation on the amount of housing required in both Thanet and East Kent is a significant concern. The development, by virtue of the estimated job numbers created both directly and within the supply chain, has the potential to significantly affect the objectively assessed need (OAN) for housing within the East Kent region. The impact is a likely significant increase in housing land requirements. This may result in indirect effects, such as additional loss of countryside through housing development, which has not been assessed and significant new infrastructure demands. An assessment must be carried out within the full submission reviewing job creation in your project and the relevant plan documents in Thanet, Dover and Canterbury (phased over respective plan periods), reviewing the labour supply with existing studies available in all three areas, assessing where the projected workforce will be drawn from to the airport, modelling migration adjustment from this information therefore deriving implications on housing need in the district and the region.

Response - The report provided by RPS entitled 'Housing and Employment Land Technical Report' (March 2018) responds specifically to this point and is provided in Appendix 6. This report concludes that there is no requirement for additional homes in the study area by Year 20 of the project to meet the forecast employment needs of the airport.

APPENDIX 6

- **Local Plan Housing Allocations** - the loss of the site as an allocation in the emerging Local Plan, for at least 2,500 dwellings, does not appear to have been considered. The proposal would also result in the loss of 56 open market units and 56no. extra care units approved on the Jentex site, meaning the total housing shortfall resulting from this development would be at least 2,612.

Response – following the decision by Thanet District Council's Full Council on 18th January 2018 to reject the new Local Plan and specifically the proposal to allocate Manston Airport for a new mixed-use settlement, the Council is reviewing its new Local Plan and land allocations for future development. In February 2018, the Council invited a 'Call For Sites' to identify sites for possible

future development. Housing allocations will need to be reviewed. Consequently, this response from the Council is no longer relevant.

Socio-economic impacts - additional burdens on local services are considered to be a major adverse impact during operation; there is no mention about an on-site education/training facility and a lack of detail about discussions with any providers and how any measures will be integrated into the project; the potential for local employment and training during construction and operational phases needs to be secured via appropriate obligations; and further information is required on the likely impacts on tourism at operational stage and how the likely effects on local amenity, businesses, the destination and the experience of visitors will be mitigated by environmental measures.

Response – Chapter 13 of the ES [document reference TR020002/APP/5.2-2] considers the likely socio-economic effects of the Proposed Development on change to local business; burden on local services and change to existing tourism and recreational activities.

In terms of change to local business during both the construction and operational phase, the ES concludes that positive effects will result from increased income generated from construction employees spend on accommodation and food, as well as potential income for local construction and supply companies, in turn providing employment opportunities. The overall effect is deemed to be of minor beneficial significance. Chapter 13 of the ES also considers the predicted effects of disruption to the local road network during construction impacting on employee and customer access to local businesses. The overall effect is deemed to be of negligible significance.

In terms of additional burden on local services, Chapter 13 of the ES considers the extent to which construction staff and operational workforce will place burdens on local services and concludes that there will not be any significant effects.

In terms of change to existing tourism and recreational activities, either on economic or amenity grounds, Chapter 13 of the ES concludes that there will not be any adverse effects.

- **Noise and impact on living conditions** – there are significant concerns about the potential impact 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 Ramsgate; it will be necessary to consider the cumulative impact of existing aircraft operations in the vicinity, proposed airside operations as well as all training flights at the airport; full details of the proposed noise mitigation strategy as well as the noise insulation scheme are required; additional noise baseline observation locations should be included within the Nethercourt residential estate, as well as the approved Manston Green development location; the masterplan shows industrial buildings directly adjacent to residential properties on Manston Court Road – the layout of this area should maximise the distance between industrial development and residential properties, with appropriate proposed use/heights/lighting to avoid harm to living conditions of those occupiers; and consideration of Vortex Strike arising from plane movements is required in the noise assessment.
- **Landscape and Visual Impact** - the development would result in a highly urbanising effect of the landscape; additional viewpoints should be added to the assessment (Thanet District Council provided a list) including more to the south of the site to consider the impact from the

development on the designated landscape character areas in Thanet; extra consideration of night time views should be considered at selected locations; more information required about the proposed landscaping on the Masterplan; and assessment of the effects of lighting from the proposed development is needed.

- **Air Quality** - an emissions mitigation assessment must be provided in accordance with Thanet District Council Air Quality Technical Planning Guidance 2016; the air quality assessment should also include flight training school operations, and airside aircraft maintenance emissions; the Applicant should also consider installation of a permanent air quality monitoring station; and a qualitative assessment of aircraft odour emissions given the history of odour complaints from the former airport use should also be provided.
- **Land Quality and Freshwater** - breaking of aircraft at the former airport should also be added as a potential contaminant source; pollutant linkages at the adjacent Jentex site and former airport bulk fuel installation require further ground investigation which needs to limit impacts on the aquifer; additional information is required regarding 'site specific measures' to address effective identification, protection, containment, attenuation, management and recovery of potential contaminants at the site (including in-built mitigation); impacts of a plane crash outside contained areas must also be considered during the construction and operational phases as this may have harmful effects on the public water supply or SSSI at Pegwell Bay following an incident; including possible damage to impermeable hardstandings; additional precautions may be needed in terms of effects on human health from UXOs as effects may be significant should unsuspected munitions be encountered during any digging operations; EA Groundwater Protection Policies (March 2017) do not support the siting of bulk fuel farms within Groundwater Source Protection Zone 1 therefore the requirements for siting and options for above ground tanks at the Jentex site must be explored with the EA; and the Construction Environmental Management Plan (CEMP) must be informed by the findings of intrusive investigation work – any works must be carried in a strictly controlled manner to ensure that contaminants are not exposed and releases allowed to air, land or controlled waters, which could cause pollution, harm or nuisance.
- **Historic Environment** - non-designated heritage assets could be affected by the proposal, and the assessment criteria should make provision for this; any harm arising from new buildings or building increasing in scale should consider the potential alteration of design, form or siting of the proposed development to mitigate any impacts and trial trenching will be required on the Northern Grass.
- **Traffic and Transportation** – there are concerns 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 development, especially regarding Spitfire Way, Spitfire Junction and Manston Court Road; the transport assessment should include any additional housing requirement, the methodology for distributing trips on the network and physical improvements to the network as well as mitigation measures; an assessment of the impact from the proposed development on the Thanet Transport Strategy must be included; and operational and junction capacity assessment should be included.
- **Biodiversity** – Thanet District Council will rely on the comments raised by KCC, Natural England and the EA.

- **Aircraft Teardown Facility** – concerns about this proposal given the historic use of the site and enforcement action taken against similar operations previously due to potential contamination ; and concerns about the need, viability and operation of such a facility within a Groundwater Source Protection Zone.
- **Residential development at Manston Green and on the Eurokent site** – the impact on the transportation network and on living conditions of future residents from the proposed development is of concern.

9.13 A response to all these comments has been provided in the Consultation Report submitted with the DCO application [document reference TR020002/APP/6.1]. A further response from Thanet District Council was received to the second statutory consultation on the proposed project on 16th February 2018. However, an email from the now Leader of the Council Councillor Bob Bayford dated 20th February 2018 retracted the submission as being ‘unrepresentative and flawed’ because it had not been approved by the Council’s elected Councillors and did not reflect the views of the Full Council meeting held on 18th January 2018.

9.14 Councillor Bayford wrote to RiverOak on 28th March 2018 to confirm that as the new Leader of the Council, that he is *“committed to improving the Council’s relationship with RiverOak as promoters of the NSIP for re-opening of the site as a cargo airport”* and that he was keen to work with RiverOak to *“ensure that the project can maximise the economic opportunities for residents whilst minimising environmental impacts from the development.”*

d) Supporting economic growth and the benefits of aviation (including job creation)

The need for increased aviation capacity and the benefits of aviation

9.15 This section of the statement considers the Government recognised benefits of increased aviation capacity as set out in the relevant national aviation policy and other documents alongside the findings of RiverOak’s own research which has been carried out by Dr Sally Dixon. This research is provided in full as part of a four-volume report submitted with the DCO application ‘*Manston Airport – A Regional and National Asset*’ (Volumes I-IV) (March 2018) (‘the Azimuth Associates Report’ - document reference TR020002/APP/7.4). The report recognises the Government and other support including from the air freight market for increases in air freight capacity. The Azimuth Associates Report presents the ‘need case’ for the Proposed Development in the absence of a relevant Airport NPS or other policy document that specifically promotes the reopening of Manston Airport in the national, regional and local interest.

9.16 The APF makes it clear that it is not appropriate to re-examine the need for increased aviation capacity or, indeed, to question the Government’s clear policy position that increases in aviation capacity are necessary and that they bring significant benefits. It states that it is the purpose of national policy to settle these issues. In this sense, the Airports NPS (Section 2) does not disagree and states very clearly that the importance of aviation to the UK is significant and that there are considerable benefits from aviation – all of which will be realised by the proposed development – as follows:

- international connectivity, underpinned by strong airports and airlines, is important to the success of the UK economy;

- it is essential to allow domestic and foreign companies to access existing and new markets, and to help deliver trade and investment, linking us to valuable international markets and ensuring that the UK is open for business;
- international connectivity facilitates trade in goods and services, enables the movement of workers and tourists, and drives business innovation and investment, being particularly important for many of the fastest growing sectors of the economy;
- international connectivity attracts businesses to cluster round airports, and helps to improve the productivity of the wider UK economy;
- large and small UK businesses rely on air travel, while our airports are the primary gateway for vital time-sensitive freight services;
- air travel also allows us ever greater freedom to travel and visit family and friends across the globe, and brings millions of people to the UK to do business or enjoy the best the country has to offer;
- businesses from across the UK utilise our aviation network to access markets worldwide. The UK's strong services sector, which provides significant export earnings for the country, is particularly reliant on aviation;
- air freight is also important to the UK economy. It is particularly important for supporting export-led growth in sectors where goods are of high value or time critical. In the future, UK manufacturing competitiveness and a successful and diverse UK economy will drive the need for quicker air freight;
- aviation also brings many wider benefits to society and individuals, including travel for leisure and visiting family and friends. This drives further economic activity; and
- the importance of aviation to the UK economy, and in particular the UK's hub status, has only increased following the country's decision to leave the European Union. As the UK develops its new trading relationships with the rest of the world, it will be essential that increased airport capacity is delivered, in particular to support development of long haul routes to and from the UK, especially to emerging and developing economies.

9.17 Section 2 of the Airports NPS also reinforces the fact that there is a need for new airport capacity in the UK as demonstrated by the challenges that already exist in the UK's aviation sector stemming in particular from capacity constraints. The document recognises that these constraints are affecting the UK's ability to travel conveniently and to a broader range of destinations than in the past which creates negative impacts on the UK through increased risk of flight delays and unreliability, restricted scope for competition and lower fares, declining domestic connectivity, erosion of the UK's hub status relative to foreign competitors, and constraining the scope of the aviation sector to deliver wider economic benefits.

9.18 The NPS concludes that the UK now faces a significant capacity challenge with aviation demand likely to increase significantly between now and 2050 and all major airports in the South East of England expected to be full by the mid-2030s, with four out of five full by the mid-2020s. By 2050 demand at these airports is expected to outstrip capacity by at least 34%, even on the department's

low demand forecast with relatively little scope to redistribute demand away from the region to less heavily utilised capacity elsewhere in the country.

- 9.19 The NPS concludes that the consequences of not increasing airport capacity in the South East of England – the ‘do nothing’ or ‘do minimum scenarios’ – are detrimental to the UK economy and the UK’s hub status. International connectivity will be restricted as capacity restrictions mean airlines prioritise their routes, seeking to maximise their profits. Capacity constraints therefore lead to trade-offs in destinations, and while there is scope to respond to changing demand patterns, this necessarily comes at the expense of other connections. Domestic connectivity into the largest London airports will also decline as competition for slots encourages airlines to prioritise more profitable routes.
- 9.20 Operating existing capacity at its limits means there will be little resilience to unforeseen disruptions, leading to delays. Fares are likely to rise as demand outstrips supply, and the lack of available slots makes it more difficult for new competitors to enter the market.
- 9.21 The Government believes that not increasing capacity will impose costs on passengers and on the wider economy. Without expansion, capacity constraints would impose increasing costs on the rest of the economy over time, lowering economic output by making aviation more expensive and less convenient to use, with knock-on effects in lost trade, tourism and foreign direct investment. The Airports Commission estimated these costs to be between £30 billion and £45 billion over 60 years. Having reviewed this further, the Government accepts this analysis and considers that recent demand growth in the South East suggests an even greater possible cost if expansion is not undertaken.
- 9.22 The Government also acknowledges the local and national environmental impacts of airports and aviation, for example noise and emissions, and believes that capacity expansion should take place in a way that satisfactorily mitigates these impacts wherever possible. Expansion must be deliverable within national targets on greenhouse gas emissions and in accordance with legal obligations on air quality.
- 9.23 In the context of the very clear conclusions on the need for additional airport capacity and the benefits associated with aviation as recognised by the Government in general, RiverOak commissioned a very specific assessment of the air freight capacity limitations and constraints in the South East – research that has not been carried out previously in such detail – with a view to concluding on Manston Airport’s ability to address these and provide for future growth. This is the Azimuth Associates Report. An earlier version of this report was presented to the Planning Inspector as part of the Public Inquiry into the Lothian Shelf Limited appeals in March 2017. The evidence was not challenged by the Appellants and was considered by the Inspector in reaching his conclusions on the four appeals, whereby he confirmed that in light of the Azimuth Associates evidence, that reopening Manston Airport for viable operations could not be ruled out.
- 9.24 The report responds to the following questions specifically with reference to the proposals for development:

1. *Does the UK require additional airport capacity to meet its political, economic, and social aims?*

- 9.25 The forecasts discussed in the Azimuth Associates report confirm the need for additional airport capacity. These forecasts show that 80,000 movements will be unmet by current capacity by 2050 and that even with the third runway at Heathrow Airport, capacity for 45,000 movements will need to be found (York Aviation, 2015). In line with the Government's own conclusions, Azimuth Associates conclude that the UK urgently requires additional airport infrastructure and that without this, the UK is haemorrhaging potential trade, particularly with non-EU countries. In monetary terms, the UK missed out on at least £9.5 billion in potential trade in 2015 and is predicted to accumulate losses at the rate of £1.1 million every hour (CEBR, 2016).
- 9.26 The Azimuth Associates report agrees that the aviation sector is of vital importance to the UK, contributing £52 billion (3.4%) to UK GDP and supporting 961,000 jobs. The importance of air travel is forecast to continue to grow, with 50% more flights in 2035 than there were in 2012, from around 9 million per year to 14.4 million. Freighter fleet is set to more than double over the next 20 years. However, airport capacity is a problem not just in the UK but also in Europe, where capacity is forecast to increase by 17% by 2035 leaving a shortfall of around nine runways' worth of capacity. By 2035, European airports will be unable to accommodate around two million flights due to capacity shortages leading to a loss of between 434,000 and 818,000 jobs and between €28 billion and €52 billion in EU GDP. At the end of November 2017, airfreight in Europe reached capacity, which has led to an increase in prices and delays. Heathrow Airport also reported severe congestion, with trucks queuing and some being turned away. Whilst globally around 56% of all air freight is carried in dedicated freighters, the UK has seen a decline in the use of freighters. A commentator believes this is due to shippers' preference for belly freight. However, when the air freight market in the UK is considered against that of the rest of the world, the lack of availability in the UK for freighter slots, airports' preference, in a constrained market, for passenger flights, and delays in loading and unloading freighter aircraft provide an equally plausible explanation for the reduced proportion of freighter to belly freight transport of goods in the UK. In the UK, non-EU trade accounts for just under half of all trade and 35% of these goods are air freighted. Both figures could increase following the UK's withdrawal from the EU. The Airports Commission forecast that, over a 60-year time frame without additional capacity, there would be a £21 to £23 billion cost to users and providers of UK airport infrastructure and £30 to £45 billion in costs to the wider economy.

2. Should this capacity be located in the South East of England?

- 9.27 The Azimuth Associates report is clear that this capacity should be in the South East. The London airports facilitate 76% of the UK's air freight and all London airports will be at capacity by 2030. The South East is particularly hard hit by the lack of airport capacity with losses in potential trade running at £2 billion each year. Demand is driven by where airlines want to fly to and from and demand is highest in the South East. Dedicated freighters have been squeezed out of Heathrow Airport and potentially moved from Stansted Airport as they focus on passengers as their preferred market. The other airports in the South East either do not have the runway length or space for warehousing to accommodate a vibrant freight operation, which may be seen, particularly by low cost carriers who do not carry belly freight, to interfere with passengers operations.
- 9.28 There is no existing dedicated cargo airport in the South East. All currently-operating airports in the South East of England are primarily passenger airports. For commercial reasons, passenger aircraft are prioritised over cargo aircraft at such airports and cargo-only aircraft flights are very limited, with

only Stansted handling significant numbers. Table 9.1 below sets out why no other airport in the South East is as suitable as Manston for dedicated air freight facilities:

Table 9.1 : Reasons why other South East airports are not suitable for air freight expansion

Airport	Constraints for air freight expansion
Stansted	Under pressure to increase low cost passenger flights.
Heathrow	Few dedicated cargo aircraft use the airport and capacity constraints mean that slots are unavailable until the third runway is built. Even then, additional capacity is likely to be taken by passenger aircraft.
Gatwick	Dedicated freighters are not a traditional market for Gatwick Airport.
Luton	Focus is on the low cost carrier market.
London City	Focused on the passenger market with a short and constrained runway (1,900m) that is unable to support a large freighter operation.
Southend	Focused on the low cost carrier market, the airport is unlikely to be suitable for mid or long range freighter aircraft.
East Midlands	The airport imposes charges on aircraft using the airport between 23.30 and 06.00 depending on the noise band of the aircraft. Shoulder supplements are charged between 0.601 to 07.00 and 21.01 to 23.29. Road access to the South East where many businesses served by integrators at the airport are based, is congested. Consequently the total time taken to deliver from origin to final destination increases especially around motorway bottlenecks.
Biggin Hill	Difficult road access to main M25 artery because of its rural location, restricted opening hours, short runway, runway orientation and proximity to Gatwick Airport creates numerous airspace issues; residential location; experiences poor weather conditions due to elevated location.
Bournemouth	Bournemouth did not handle any cargo movements in 2016 or 2017. Its location is not ideal for road access by trucks and lies some 30 miles from the M3 and M27 on a route that passes through the New Forest National Park which is not ideal for fleets of trucks.
Farnborough	Restricted number of movements particularly at weekends with only certain aircraft categories permitted. Business Aviation focus that would not fit with a cargo model.
Lydd	Short runway with considerable approach issues and a rural location with poor surface transport connectivity.
Northolt	It has a short runway and is close to Heathrow creating airspace issues.
Rochester	Grass runways which are less than 1,000m and not suitable for cargo operations. The airport does not have supporting infrastructure to facilitate large-scale freight operations and has restricted operating hours and a cap on aircraft movements.
Shoreham	Short runway suitable for light aircraft only. Road access is relatively poor and would require reconfiguration to support the HGV movements generated by a freight operation.

Southampton	Only handled 23 cargo movements in 2017 and 6 aircraft movements in 2016 (it was 4 in 2015). Good road access and has an onsite railway. Their Masterplan and vision statement makes no mention of developing an air freight market.
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9.29 It is clear that the aviation market prefers the South East, with forecasts showing that by 2050, the value of air cargo lost to London due to capacity constraints would equate to £106 billion per annum with net national losses of around £3.9 billion per annum. The number of additional dedicated freighters movements required at London airports is forecast to be 53,954 with no additional runways. Indeed, without extra capacity in the South East, 2.1 million tonnes of freight would have to be diverted elsewhere, mainly to Northern European airports. This tonnage equates to some 100,000 truckloads and could put huge pressure on the UK's road network and the Channel crossings.

3. *Can Manston Airport, with investment from RiverOak, relieve pressure on the UK airport network and meet the requirement of a nationally significant infrastructure project?*

9.30 The Azimuth Associates report concludes that due to its size, location and lack of airspace constraints, Manston has the potential to attract and accommodate at least 10,000 cargo movements per year. Consequently, Manston Airport would seem to be the only viable option for a freight-based airport in the South East in the short, medium, and long-term. Moreover, the work in the Azimuth Associates report shows that the addition of a third runway at Heathrow Airport is unlikely to change the need for a freight-based airport at Manston. Manston Airport can be operational in as little as two years from the transfer of its ownership to an airport operator. Its strategic location, runway length and potential to accommodate all necessary infrastructure together with the considerable local backing mean it is without comparison in the UK. The Azimuth Associates report shows that Manston is the only airport in the South East that can provide airport infrastructure for freight cargo that is badly needed by the UK now and in the long term.

9.31 Manston Airport is located in the South East where aviation industry demand is highest and most constrained. In addition to its long runway, ideal airspace location, benefits from easy surface access to London and the rest of the UK, it is located close to mainland Europe, and, with RiverOak's proposed investment, can provide rapid handling and turnaround times for air freight. The airport would provide almost immediate relief to the pressing situation that is causing £2 billion in potential trade from being lost to the South East each year if it remains without additional runway capacity.

9.32 Whilst in the short to medium-term Manston will be vital as an operational airport, even in the longer term, after the proposed opening of Heathrow's third runway and to 2050, Manston provides the only airport infrastructure in the South East that can provide the capacity needed to support the overspill predicted within all timeframes. The Azimuth Associates report concludes that there is no other airport such as Manston in the London area in terms of runway length, airspace, slot availability, land available for warehousing, etc.

9.33 In conclusion, this section demonstrates unequivocally that there are limitations and constraints on air freight capacity in the South East airports; that reopening Manston Airport in the way that it is being promoted by RiverOak in this DCO application will address these constraints and provide for future growth and that there are benefits at national, regional and local level that will be delivered by the DCO proposals. In addition, there can be little doubt that, in an increasingly competitive economic climate, the UK cannot afford to lose one of its long-serving and strategically significant airports.

Manston Airport is a valuable regional and national asset, capable of providing infrastructure badly needed by the UK in the short, medium and long-term, playing a role in helping Britain's connectedness and trade with the rest of the world, and of making a substantial contribution to the future economic and social well-being of the UK. Reopening Manston Airport in the way envisaged by RiverOak is very much needed and it will bring significant benefits.

Aviation demand forecasts

- 9.34 The Airports NPS (paragraph 3.23) fully recognises that the aviation sector can also boost the wider economy by providing more opportunities for trade through air freight. The time-sensitive air freight industry, and those industries that use air freight, benefit from greater quantity and frequency of services, especially long haul. By providing more space for cargo, lowering costs, and by the greater frequency of services, this should in turn provide a boost to trade and GDP benefits.
- 9.35 The Azimuth Associates Report (Volume II) contains a qualitative study of potential demand for Manston Airport as a freighter hub for the South East of the UK with additional passenger and general aviation services. It considers whether reopening Manston Airport in the way intended by RiverOak would be viable. This is an important consideration not only in light of the policy objectives set out in the APF and in demonstrating a need for the proposed development in the absence of any specific promotion through the Airports NPS, but significantly when considering the implications of the DCO proposals on the spatial planning process within Thanet District Council and as part of its new Local Plan. The Council has recently voted and shown its support for continued safeguarding of the Manston Airport site for aviation use and the Azimuth Associates report reinforces that there is a definite need for this in the local, regional and national interest. Consequently, and in light of the Thanet District Council response to the June/July 2017 statutory consultation on the project, it is not considered that there is a general local planning policy conflict when considering the proposals for development.
- 9.36 The research detailed in the Azimuth Associates report seeks to examine the demand for Manston Airport as a freight hub for the South East of the UK with additional passenger and general aviation services. The report overwhelmingly concludes that there is clear demand for additional airport capacity in the South East of England, with evidence that existing airports are increasingly focusing on the passenger market as they near capacity. Manston Airport is located in the South East where aviation industry demand is highest and most constrained (DfT, 2017). The airport will provide dedicated and rapid handling and turnaround times for air freight.
- 9.37 The airport model being promoted at Manston Airport will present significant opportunities to address known industry constraints as follows:
- The lack of available slots at South East airports
 - Bumping of freight from passenger aircraft (this means air freight that has been booked onto a passenger flight is denied loading. It is understood that this may happen numerous times before the goods are loaded into the bellyhold of a passenger flight)
 - Security issues particularly with outsized cargo
 - Speed of turnaround and bottlenecks for air freight

- The advent of Brexit and potential restrictions and delays at the Channel crossings will be a cause of concern for those freight shippers reliant on this form of transport. With Manston Airport reopened, there may be a change in the model used, away from trucking to Europe and onto aircraft

9.38 Potential markets have been identified for Manston Airport as follows:

- Perishables including fruit, vegetables, flowers, fish, and shellfish
- Outsized freight
- Express freight
- Formula One and luxury cars
- Live animals (for breeding or racing)
- Time sensitive items such as aircraft and the oil and gas industry
- Humanitarian and military flights

9.39 The Azimuth Associates Report has also identified opportunities for aircraft recycling, an on-site maintenance, repair and overhaul facility (MRO), a Fixed Base Operation (FBO), and a flying school. Additionally, there is the potential to attract an integrator to Manston Airport, which would dramatically increase the profitability of the airport.

9.40 In terms of passenger services, the Azimuth Associates Report has identified opportunities including providing a base for a number of low cost carrier aircraft (LCCs), for charter and scheduled flights, and for a tie up with Dover Harbour Board to receive passengers destined for cruise ships. The proposed London Resort and Ebbsfleet Garden City developments are expected to increase demand for both in and outbound flights.

9.41 The proposed Lower Thames Crossing will improve accessibility by road to Manston Airport and the Thames Estuary 2050 regeneration project will benefit from the presence of a freight-focused airport and will, in turn, stimulate demand for the airport.

9.42 The DCO process requires RiverOak to provide evidence that shows Manston Airport can handle at least 10,000 freighter movements per year. York Aviation (a firm of air transport consultants), in an unpublished report for Transport for London (TfL) entitled Note on Freight Connectivity, specifically mention Manston, saying the airport can take 14,000 movements per annum, relieving other South East airports and that *“it is reasonable to assume that around 14,000 freighters a year could still be accommodated in the vicinity of London by using capacity at airports such as Manston”*. It is argued that there are no other airports like Manston in the vicinity of the London area which demonstrate such advantages like a long runway, airspace benefits, slot availability and land for associated development.

9.43 Volume III of the Azimuth Associates Report sets out the forecasts for Manston Airport, for freight and passengers for the first 20 years of operation (currently projected to be 2020 to 2039), and detailing the infrastructure required to deliver the forecast. Although the capability of the proposed airport is far greater, the forecast shows use of the airport exceeding 10,000 air freight movements

by Year 6 (2025). Exports are forecast to slightly exceed imports, particularly in the early years of operation. The research conducted to derive the forecasts show that the opening of Heathrow's proposed third runway will not hamper Manston Airport's viability, whenever the additional capacity at Heathrow becomes operational.

- 9.44 Whilst the RiverOak focus is on the air freight market, the airport is also forecast to handle a considerable number of passengers. Driven by the lack of capacity at South East airports, passenger numbers at Manston Airport are forecast to commence at around 660,000 per year, rising to 1.4 million by Year 20 (2039) of operation. Manston Airport can provide a base for a number of low cost carrier aircraft, host seasonal charter flights, and as mentioned earlier, work with Dover Harbour Board to receive passengers destined for cruise ships. The proposed London Resort and Ebbsfleet Garden City developments are also expected to increase demand for both in and outbound flights.

The benefits to local economy

- 9.45 Volume IV of the Azimuth Associates report considers the likely impacts of the proposed development on the local economy based on the forecast information provided in Volume III of the report. In this sense, it recognises that Kent as a county performs economically below the south-east average with East Kent not performing as well as West Kent. Thanet, in particular, has many issues associated with deprivation and ranks as the most deprived area of Kent and one of its wards, Cliftonville West, is ranked 4th out of 32,844 Lower Super Output Areas (LSOAs) in England. Thanet performs consistently behind the rest of Kent with lower wages, lower productivity, higher unemployment and low participation in higher education.
- 9.46 Kent County Council wants to address disadvantage and aims to deliver critical infrastructure that will create the conditions for economic growth across Kent, raise aspirations, and encourage businesses to invest in the County. Thanet District Council is also working to transform the local economy and has an ambitious vision for the future of Thanet. This includes increasing participation in work, workforce skills, productivity, wages, and ultimately GVA and GPD in Thanet.
- 9.47 Airports are recognised for their impact on local and regional economies and no other asset is likely to be able to provide the jobs and other economic benefits to the area than a fully operational Manston Airport. In terms of aviation, Kent County Council's strategy for airports was to oppose the construction of a new Thames Estuary Airport and also the second runway at Gatwick, preferring to maximise use of existing airport infrastructure. As earlier sections of this statement demonstrate, the reopening of Manston Airport will fit with Kent County Council's strategy. Operations at Manston Airport can provide the impetus for the improved internationalisation of Kent businesses, particularly if an enterprise zone is linked to the airport to leverage the benefits of exporting.

Job creation

- 9.48 East Kent is in desperate need of high-quality training and employment. Since the closure of the Pfizer factory in Sandwich in 2011 and Manston Airport itself in 2014, East Kent has not had a large-scale high-tech employer. Reopening Manston Airport is one of the last opportunities in the local area to create job creation on a large scale and in this sense, it is much needed to boost the local and regional economy.

- 9.49 The Azimuth Associates Report recognises the importance of air freight operations to the creation of jobs and to increasing economic and social prosperity. The socio-economic impacts of an airport's operations include direct, indirect, induced and catalytic effects. Azimuth Associates predict that direct on-site jobs will be 2,150 by Year 5, of which 697 posts are forecast to be created by the airport operator. The direct employment figure will rise with increasing freight tonnage and passenger numbers. By the end of Year 5, the indirect and catalytic jobs forecast to result from the operation at Manston Airport are 3,870 and 8,601 respectively, and 6,151 and 13,668 by the end of Year 20. The total figure for jobs created by the operations of Manston Airport is forecast at around 23,235.
- 9.50 Along with hi-tech jobs comes the requirement for hi-tech education, and RiverOak will be working with local education institutions to develop courses that will equip local people with the skills needed to be able to work at the airport or in related employment. RiverOak are keen to promote the establishment of an aviation training and education facility in partnership with higher education and further education providers.
- 9.51 The job figures represent a wide range of long-term opportunities for aspiring local school leavers, college graduates, and those at all stages of their careers. Construction jobs required in the redevelopment of Manston Airport are shown separately since these are impermanent positions. Before RiverOak reopens Manston Airport, freight and passenger stands for aircraft will be constructed as well as warehousing and fuel storage to meet the forecast demand. Further construction will take place in four years (see Volume III of the Azimuth Associates report for details). The redevelopment project across the 15-year timeframe is forecast to require the equivalent of 1,475 working people years. From this figure, the number of construction workers required is forecast to be between 600 and 700. There are also likely to be additional jobs created for off-site work by local construction companies.

Other socio-economic benefits

- 9.52 In addition to job creation, there are numerous other socio-economic benefits to arise from aviation operations including the following which will be realised through reopening the airport:
- **Training and education:** Working with Higher Education (HE) and Further Education (FE), RiverOak can leverage opportunities associated with Manston Airport's operation.
 - **Raising the aspirations of young people:** Manston Airport can stimulate the desire to continue in education and training, encouraging young people to improve their life chances and realise their full potential.
 - **Connectivity:** Increased connectivity improves the GDP of a region and Manston Airport would dramatically improve the connectivity of the area, which is even more essential with the advent of the UK's exit from the EU.
 - **Attracting inward investment:** The presence of an airport supports inward investment and business location decisions.
 - **Tourism:** Passenger services will support both inbound and outbound tourism.
 - **Generating wealth:** GDP figures based on the airport's impact have been calculated together with the tax revenues the projected job creation is likely to produce.

Summary

- 9.53 In conclusion, and in terms of demand, the Azimuth Associates Report concludes that Manston Airport is of strategic importance to the UK, having the ability to attract significant air traffic to meet the criteria of a national significant airport.
- 9.54 Chapter 13 of the ES considers the likely socio-economic effects of the Proposed Development and concludes that there will be no adverse effects as a consequence of both the construction and operation phases. The Proposed Development is expected to deliver beneficial effects in terms of direct and indirect/induced job creation and tourism.
- 9.55 Reopening of Manston Airport is very much in the public interest and it will realise and bring all the significant benefits associated with increasing aviation capacity as recognised in the APF and Airports NPS including improving international connectivity and links to international markets; contributing significantly to the UK economy; facilitating trade and movement to support the fastest growing sectors of the economy; enhancing gateways to the UK for freight and providing much-needed and dedicated facilities for which there is a high demand. In addition to the considerable number of direct, indirect, induced and catalytic jobs created, other socio-economic benefits that arise from an airport's operation including training and education opportunities; attracting inward investment; tourism and increasing connectivity especially in the advent of the UK's exit from the EU will benefit the local and regional area. The extent of these benefits, and the importance of these benefits to the local and regional area, which desperately needs them, adds further weight to the fact that there is a clear need for the reopening of Manston Airport.

e) Climate Change Impacts/Adaptation

- 9.56 Paragraphs 93, 96 and 100 of the NPPF are relevant as is paragraph 2.4 of the APF.
- 9.57 Paragraphs 149 and 152 of the draft changes to the NPPF are also relevant but attract less weight as they are the subject of ongoing consultation and could change.
- 9.58 In paragraphs 4.41 to 4.52 of the Airports NPS, the Government sets out how its policy on climate change adaptation will be put into practice, and in particular how the Applicant and the Secretary of State will take into account the effects of climate change when developing and considering airports infrastructure applications.
- 9.59 The Airports NPS recognises that new airports infrastructure will typically be a long-term investment which will need to remain operational over many decades, in the face of a changing climate. Consequently, it states that the Applicant must consider the impacts of climate change when planning design, build and operation and that any accompanying environmental statement should set out how the proposal will take account of the projected impacts of climate change. Detailed consideration must be given to the range of potential impacts of climate change using the latest UK Climate Projections available at the time, and to ensuring any environmental statement that is prepared identifies appropriate mitigation or adaptation measures. This should cover the estimated lifetime of the new infrastructure. Any adaptation measures are also required to be assessed as part of any Environmental Impact Assessment and included in the environmental statement, which should set out how and where such measures are proposed to be secured.

- 9.60 The Airport NPS further states (paragraph 5.77) that as far as possible, the Applicant's assessment should also seek to quantify impacts including:
- Emissions from surface access due to airport and construction staff;
 - Emissions from surface access due to freight and retail operations and construction site traffic.
 - Emissions from surface access due to airport passengers/visitors; and
 - Emissions from airport operations including energy and fuel use.
- 9.61 This should be undertaken in both a 'do minimum' and also in the 'do something' scenario for the opening, peak operation, and worst case scenarios.
- 9.62 The Airport NPS includes at paragraphs 5.78 to 5.81 the mitigation measures that would be expected to reduce carbon which may include, but are not limited to:
- Zero or low-emission hybrid or electric vehicle use (ultra-low emission vehicles), charging and fuel facilities;
 - Reduced engine taxiing (improved taxiing efficiency);
 - Reducing emissions from aircraft at the gate;
 - Reduced emissions from airport buildings (for example from lower carbon heating);
 - Changes to the layout of surface access arrangements; and
 - Encouraging increased use of public transport by staff and passengers.
- 9.63 In terms of decision making, the Airports ES specifically states that any increase in carbon emissions alone is not a reason to refuse development consent, unless the increase in carbon emissions resulting from the project is so significant that it would have a material impact on the ability of Government to meet its carbon reduction targets, including carbon budgets (paragraph 5.82). Evidence of appropriate mitigation measures (incorporating engineering plans on configuration and layout, and use of materials) in both design and construction should be presented as part of any application for development consent (paragraph 5.83) and the Secretary of State will consider the effectiveness of such mitigation measures in order to ensure that, in relation to design and construction, the carbon footprint is not unnecessarily high. The Secretary of State's view of the adequacy of the mitigation measures relating to design, construction and operational phases will be a material factor in the decision making process.
- 9.64 Chapter 16 of the ES [document reference TR020002/APP/5.2-2] provides the assessment of the Proposed Development in relation to Climate Change. In accordance with the Airports NPS it sets out how the proposal will take account of the projected impacts of climate change. This chapter and others in the ES provide a detailed consideration of the range of potential impacts of climate change and they identify appropriate mitigation or adaptation measures.
- 9.65 Section 16.4 of Chapter 16 of the ES considers the current climate conditions at the Proposed Development site. The site of the Proposed Development sits on the Isle of Thanet peninsula at within a temperate marine climate. Being located on the east coast, it is furthest in the UK from the

paths of most Atlantic depressions and thus receives a relatively low amount of rain and extreme wind events, with warmer, drier summers relative to other UK locations. Projected conditions at the site during the operational phase of the Proposed Development and up to 2050 are expected as follows:

- Warmer, drier summers, and milder wetter winters
- An increase in very hot days and dry spells
- Fewer days with snow and frost
- More intense downpours of rain (particularly in summer)
- Short periods of intense cold weather and an increase in dry spells
- An increase in the frequency and intensity of storms and high winds

9.66 Environmental measures have been incorporated into the design of the Proposed Development to address climate change resilience, in-combination climate change impacts and greenhouse gases. These measures are set out in Section 16.5 of Chapter 16 of the ES.

9.67 In terms of addressing climate change resilience, only the Flood Risk Assessment which is Appendix 8.2 of Chapter 8 of the ES [document reference TR020002/APP/5.2-8] incorporates specific climate change resilience design measures. This is not unusual at this stage of an application where the majority of building, engineering and other design details have been finalised. It is also the case that a high degree of certainty regarding the minimum level of performance of the new development can be assured due to the existence of robust and established design standards that ensure the performance and quality of new and refurbished infrastructure and buildings.

9.68 RiverOak has committed to developing a Climate Change Adaptation Strategy following DCO approval. This will put in place a series of measurable actions for ensuring the functionality of the airport is not reduced by climate change over time. For example, climate change will be considered in the thermal modelling of buildings to ensure that the final design functions across a range of projected climate futures, either through direct design measures or by designing in adaptability. This is in-line with the principles set out in BREEAM. The strategy will embed the routine assessment of climate change within the detailed design stages and the alteration of design approaches as required. This includes, but is not limited to, considering:

- Heat stress within buildings impacting the functionality of assets and causing health impacts for visitors and staff, as well as impairing pavements, concrete surfaces and fleet maintenance;
- Increased frequency and severity of drought risk and changes to soil moisture deficit;
- Increased variability of snowfall presenting challenges to winter contingency planning;
- Increased disruption to airfield operations due to stormy conditions; and
- Extreme wind damage to assets, standing aircraft, vehicles and injuries to staff.

9.69 The Strategy will identify options for adaptation that provide benefits under a range of future climate scenarios. It will also consider adaptive management strategies which can be developed and

enhanced over time in response to a changing climate and passenger demands. It will mandate working with interdependent infrastructure operators to ensure climate change challenges are tackled collaboratively e.g. power, water resources, road, rail, other aviation operators, telecommunications etc.

9.70 A summary of embedded, in-combination climate change impact approaches that are considered part of the Proposed Scheme design are described in Table 16.4 of Chapter 16 of the ES. These measures have been incorporated to avoid, reduce or compensate for potential adverse climate change effects and include, for example, designing the attenuation ponds with a 40% capacity allowance to allow for climate change.

9.71 A summary of the environmental measures that have been incorporated into the development proposals to date in order to avoid, reduce or compensate for potential adverse greenhouse gas effects is provided below in Table 16.5 of Chapter 16 of the ES. These include adopting a Construction Environment Management Plan (CEMP) to limit, for example, air quality effects during construction and adopting a Construction Traffic Management Plan (CTMP) which promotes car sharing, travel plan awareness and encourages use of public transport.

9.72 In terms of the potential for effects:

- Climate Change Resilience - there are no potentially significant effects identified for climate change resilience, as the commitment to embed a Climate Change Adaptation Strategy within the detailed design, construction and operation of the airport is regarded as an appropriate mitigation measure at this stage.
- In-combination Climate Change Impacts - as a result of embedded mitigation measures for climate change including within the ecology and flood risk design as set out in Table 16.8 in Chapter 16 of the ES, there are no significant effects relating to in-combination climate change impacts.
- Greenhouse Gas – a greenhouse gas assessment has been carried out for the Proposed Development and carbon emissions associated with the Proposed Development have been calculated. Flights associated with the airport make up 93% of emissions at peak operation, with the construction and operation accounting for the other 7%. At peak operation, Manston Airport represents 2.1% of the emissions the UK aviation sector can produce in 2050. Therefore, whilst it is not possible to definitively say whether this amount of emissions is in-line with UK carbon policy, it is clear that the Proposed Development should aim to reduce GHG emissions wherever possible. There are no significant effects of greenhouse gas emissions from the Proposed Development on the climate because specific actions have been incorporated into the scheme to reduce greenhouse gases including:
 - Avoiding the use of diesel or petrol-powered generator where practicable;
 - Minimising idling vehicles;
 - Developing travel plans for construction staff and passengers;
 - Increasing efficiency of construction traffic;

- Using Fixed Electrical Ground Power to minimise energy use by aircraft on the ground;
- Applying penalties when older, less efficient aircraft is used;
- Using a largely electric Ground Support Equipment fleet; and
- Committing to the development of a Carbon Minimisation Action Plan, including incorporation of mitigations to reduce emissions during the landing and take-off cycle, the construction of infrastructure, energy used by buildings and the embodied carbon of materials. This Plan will cover the design, construction and operation of the Proposed Development and ensure best practice measures for reducing emissions from the scheme are implemented.

Summary

9.73 The Masterplanning process has included some measures to ensure that the effects of climate change are minimised or that the Proposed Development can adapt to climate change in the future. Adopting a Carbon Minimisation Action Plan will further ensure that the functionality of the airport is not reduced by climate change over time. The detailed design stages that will follow any grant of a DCO will progress against established design standards that ensure the performance and quality of new and refurbished infrastructure and buildings. Environmental measures have been incorporated into the development proposals to minimise the potential for adverse greenhouse gas effects including adopting a CEMP and CTMP which will also limit the carbon impacts of the project as required by the Airports NPS (paragraphs 5.78 and 5.80). These measures will ensure that locally set standards relating to climate change adaptability and achieving a low carbon economy are met. As recognised in paragraph 5.79 of the Airports NPS, aircraft are expected to become cleaner as technology and standards improve and fleets evolve and this too will ensure that carbon impacts are reduced over the project's timeframe. The airspace reform that is currently under consultation will further assist with this objective. The assessment states that there will be no significant effects as a result of the Proposed Development. It is therefore in accordance with the relevant planning policies and provisions governing climate change and carbon emissions.

f) Noise

9.74 Paragraph 123 of the NPPF is relevant as are paragraphs 3.3, 3.12, 3.13, 3.17, 3.24, 3.35, 3.36 and Annex A of the APF and saved Policy EC2 from the 2006 adopted Thanet Local Plan.

9.75 Paragraph 5.44 of the Airports NPS states that the impact of noise from airport expansion is a key concern for communities affected, and that the Government takes this issue very seriously. The NPS recognises that high exposure to noise is an annoyance, can disturb sleep, and can also affect people's health. Aircraft operations are by far the largest source of noise emissions from an airport, although noise will also be generated from ground operations and surface transport, and during the construction phase of a scheme. Paragraph 5.45 recognises that aircraft noise is not only determined by the number of aircraft overhead, but also by engine technologies and airframe design, the paths the aircraft take when approaching and departing from the airport, and the way in which the aircraft are flown. Paragraph 5.47 repeats the Government's desire as set out in the APF to strike a fair balance between the negative impacts of noise (on health, amenity, quality of life and productivity) and the positive impacts of flights.

- 9.76 Paragraph 5.52 requires Applicants to undertake a noise assessment for any period of change in air traffic movements prior to opening, for the time of opening, and at the time the airport is forecast to reach full capacity and that this should form part of the environmental statement. The noise assessment should include the following:
- A description of the noise sources;
 - An assessment of the likely significant effect of predicted changes in the noise environment on any noise sensitive premises (including schools and hospitals) and noise sensitive areas (including National Parks and Areas of Outstanding Natural Beauty);
 - The characteristics of the existing noise environment, including noise from aircraft, using noise exposure maps, and from surface transport and ground operations associated with the project, the latter during both the construction and operational phases of the project;
 - A prediction on how the noise environment will change with the proposed project; and
 - Measures to be employed in mitigating the effects of noise.
- 9.77 The NPS makes clear that these should take into account construction and operational noise (including from surface access arrangements) and aircraft noise. It also states that the applicant's assessment of aircraft noise should be undertaken in accordance with the developing indicative airspace design. This may involve the use of appropriate design parameters and scenarios based on indicative flightpaths.
- 9.78 Paragraph 5.53 relates to operational noise, with respect to human receptors, and states that this should be assessed using the principles of the relevant British Standards and other guidance. For the prediction, assessment and management of construction noise, reference should be made to any British Standards and other guidance which give examples of mitigation strategies. In assessing the likely significant impacts of aircraft noise, the applicant should have regard to the noise assessment principles set out in the national policy on airspace.
- 9.79 In terms of mitigation, paragraph 5.55 states that the Government recognises that aircraft noise is a significant concern to communities affected and that, noise-related action will need to be taken. Such action should strike a fair balance between the negative impacts of noise and positive impacts of flights. Paragraph 5.56 states that the Government recognises that noise at night is widely regarded as the least acceptable aspect of aviation noise. Paragraph 5.57 states that the Government expects the applicant to make particular efforts to avoid significant adverse noise impacts and mitigate other adverse noise impacts. Paragraph 5.58 states that in making a decision, the Secretary of State will consider whether the mitigation measures put forward by the applicant are acceptable. The noise mitigation measures should ensure the impact of aircraft noise is limited.
- 9.80 Paragraph 5.60 states that the Applicant should put forward plans for a noise envelope and that an envelope should be tailored to local priorities and include clear noise performance targets.
- 9.81 Paragraph 5.62 states that the Government expects the applicant to make particular efforts to incentivise the use of the quietest aircraft at night.

- 9.82 Paragraph 5.64 states that noise mitigation measures at the construction stage should also be provided. These should draw on best practice from other major construction schemes, with due regard given to any relevant British Standards and other guidance, and should be taken into account during the procurement of contractors. Paragraph 5.65 states that other measures to mitigate noise during the construction and operation of the development may include one or more of the following:
- Reducing noise at point of generation and containment of noise generated;
 - Where possible, optimising the distance between source and noise-sensitive receptors, and incorporating good design to minimise noise transmission through screening by natural barriers or other buildings; and
 - Restricting activities allowed on the site.
- 9.83 Paragraph 5.68 states that development consent should not be granted unless the Secretary of State is satisfied that the proposals will meet the following aims for the effective management and control of noise, within the context of Government policy on sustainable development:
- Avoid significant adverse impacts on health and quality of life from noise;
 - Mitigate and minimise adverse impacts on health and quality of life from noise; and
 - Where possible, contribute to improvements to health and quality of life.
- 9.84 Chapter 12 of the ES [document reference TR020002/APP/5.2-2] provides the assessment of the potential noise and vibration effects of the Proposed Development. It considers effects on occupiers of residential properties and changes in the noise environment of local communities. The assessment also considers the effects of noise on community facilities such as schools, hospitals, places of worship and commercial properties such as offices. It should be read alongside other chapters in the ES but especially Chapter 15 on Health and Wellbeing.
- 9.85 Central to the assessment is the Government's overall policy on aviation noise as set out in paragraph 3.12 of the APF and paragraphs 5.54 and 5.55 of the Airports NPS which is to limit and, where possible, reduce the number of people in the UK significantly affected by aircraft noise and to strike a fair balance between the negative impacts of noise (on health, amenity, quality of life and productivity) and the positive impacts of flights – the concept of a 'Balanced Approach.'. The noise assessment considers those issues listed in paragraphs 5.52 and 5.53 of the Airports NPS.
- 9.86 The noise assessment has been prepared without exact details relating to airspace options, operating principles and aircraft flight paths. These will be formalised through an Airspace Change Proposal (ACP) which is a separate consenting regime that will happen after any DCO is granted for the Proposed Development. The ACP will be submitted through the Civil Aviation Authority's (CAA) airspace change process and the potential noise effects will be assessed again at that time following the CAA guidance within the Civil Aviation Publications (CAP). The ACP will therefore provide opportunities for communities to engage on future airspace options through an extensive consultation process as well as the preparation of a separate Environmental Statement to accompany the ACP.
- 9.87 This assessment of aircraft noise presented in this ES is based on indicative prototype routes which will be subject to authorisation and/or modification via the ACP, hence the impact of aircraft noise

will be subject to change during that process. Close to the airport, on landing, final approaches and immediately after take-off, airspace options are limited hence noise effects have been predicted with the greatest certainty. This area is also where the highest noise effects are expected. Further from the airport, where there is greater flexibility for airspace change, noise effects will be subject to more variation during the ACP.

- 9.88 To understand the potential variation in noise impacts, the ES has considered indicative prototype airspace route options within a 'design swathe'. This design swathe has defined a swathe or corridor in which the final flight paths following the ACP will likely be within and is designed around the knowns of the local airspace, including other airways and navigational aids.
- 9.89 Prototype routes have been used for the assessment of aircraft noise, which have been developed around design principles, namely 'avoid overflying populations', 'overfly populations' and 'swathe centre line'. An options appraisal of these principles is presented in Appendix 12.3 of Chapter 12 of the ES [document reference TR020002/APP/5.2-12] which, demonstrates that the variation in the population adversely effected and significantly adversely effected by noise across the design principles is less than 1%, based on the operating conditions modelled. This process is both normal and unavoidable due to the separate consenting regimes. The assessment is therefore robust because it has considered the range of design outcomes which could occur following the completion of the ACP.
- 9.90 The noise assessment in the ES has made two other assumptions. It assumes that noise from next generation aircraft will be quieter than today's aircraft albeit that actual noise levels are still uncertain. Therefore, the noise assessment includes a robust worst-case assessment of noise from future aircraft types assuming that future generation aircraft will produce the same noise as today's equivalent aircraft. Secondly, the noise assessment makes assumptions regarding equipment, working methods and times for the construction programme based on professional judgment and advice from the design team. A precautionary approach has been used by utilising a reasonable worst-case scenario in all variables. This is considered a typical approach reflecting the level of information available at this stage in a development.
- 9.91 A study area 2km as measured from the site boundary has been adopted for the assessment of noise and vibration from ground based elements during construction and operation of the Proposed Development. The spatial scope of noise from aircraft in flight is partly governed by the extents to which areas are overflown, and thus adversely affected by aircraft noise. An initial study area (as measured from the site boundary) of 14km along the westerly runway centreline (i.e. to Herne Bay coastline) and 3.5km along the easterly centreline (i.e. to Ramsgate coastline) has been adopted for the assessment of aircraft noise.
- 9.92 Environmental measures have been incorporated into both the construction and operational phases of the Proposed Development in order to avoid, reduce or compensate for potential adverse noise effects as follows (also see Section 12.5 of Chapter 12 of the ES):
- **Construction Environmental Management Plan (CEMP)** – specifically in relation to noise, this will include a requirement to use best practicable means to minimise noise and vibration during construction; to erect hoarding close to sensitive properties; and to make applications to obtain relevant contractor consents from the local authority;

- **Noise Mitigation Plan** – see Section 9(r) of this statement for further details. The Plan includes a dwelling relocation scheme for those homeowners exposed to the highest levels of airport related noise and dwelling insulation scheme and insulation scheme for noise-sensitive buildings that will experience significant noise exposure;
- **Control of Industrial and Commercial Sound during Operation of the Proposed Development** – a set of measures will be put in place to control the effects of noise from the operation of aviation-related infrastructure and fixed plant based on the principles set out in British Standard BS4142:2014; and
- **Masterplan Design** – measures have been included in the illustrative Masterplan Design to mitigate against noise including erecting a 3m acoustic fence around the southern and eastern boundaries of the proposed fuel farm; establishing a designated engine ground running area at which all open field engine ground runs will take place and establishing a landscape buffer area between the business park and the houses immediately adjoining its eastern boundary on the Northern Grass.

9.93 The potential noise effects that have been assessed are as follows:

- Noise from the construction of the Proposed Development and the transport of construction materials;
- Noise from aircraft and airport operations including from aircraft in the air and noise from aircraft operations on the ground, associated Ground Support Equipment, airfield activities and airport buildings during operation of the Proposed Development;
- Changes in surface access noise, namely road traffic noise from vehicle movements associated with the operation of the Proposed Development; and
- Noise from the secondary business infrastructure located within the Northern Grass area.

9.94 Section 12.8 of Chapter 12 of the ES summarises the significant effects from the Proposed Development from noise and vibration. The conclusions of the noise assessment are as follows:

- No significant construction noise effects, or indirect effects from construction traffic, were identified on any non-residential receptors or residential communities for day time construction works.
- A potential significant effect during construction has been identified at approximately 15 dwellings on Bell Davies Drive and Spitfire Way during night time construction works.

However, it is envisaged that the work could be undertaken so that this significant effect is avoided. Prior to commencing construction, there will be a re-assessment of noise to reflect the availability of more detailed construction information. This will contain specific mitigation measures to control noise however a typical measure, likely to be effective in such circumstances would be temporary acoustic barriers. For this reason, the eventual mitigation solution can be effective although it would be determined based on exact site conditions and plant to be used.

- Once operational, in the opening year, up to 115 residential dwellings are forecast to be exposed to significant annoyance and disturbance as a result of daytime aircraft noise (daytime SOAEL of 63 dB LAeq,16hr). In Year 20, when aircraft operations are at maximum capacity, up to 225 residential dwellings are forecast to be exposed to significant annoyance, disturbance and sleep disturbance as a result of night-time aircraft noise (noise levels above the night-time SOAEL of 55 dB LAeq,8hr).

These properties will qualify for noise insulation under the proposed Noise Mitigation Plan. The noise insulation offered to residents of affected properties will reduce noise inside all dwellings such that it does not reach a level where it will significantly affect residents. However, adverse impacts would remain in external areas such as gardens.

- In Year 20, when aircraft operations are at maximum capacity, approximately 10 residential dwellings are forecast to be exposed to unacceptable annoyance and disturbance as a result of daytime aircraft noise (daytime UAEL of 69 dB LAeq,16hr).

In line with Government aviation policy, homeowners will be eligible for financial assistance to move away from the airport according to the proposed dwelling relocation scheme.

- In Year 20, significant adverse effects have been identified as being likely as a result of an increase in noise in the following communities which are in the vicinity of the airport and flight paths:
 - Ramsgate;
 - Manston;
 - Wade;
 - West Stourmouth; and
 - Pegwell Bay.

In these communities, aircraft noise would increase to the point where there would be a perceived change in quality of life for occupants of buildings in these communities or a perceived change in the acoustic character of shared open spaces within these communities.

Summary

- 9.95 Following mitigation, there are two instances whereby adverse effects are expected as a result of the Proposed Development - 225 dwellings are expected to be adversely (not significantly) affected by aircraft noise by Year 20 of operation and also by Year 20, there are five communities that are expected to be adversely and significantly affected from aircraft noise. It is worth remembering that the noise assessment adopts a robust 'worst case scenario' approach whereby no allowances have been made for technological improvements to aircraft in the future that will make them quieter – something which is accepted in paragraph 3.24 of the APF. The expectation therefore is that by Year 20, the predicted magnitude of these effects will not be as severe. Additionally, the noise assessment assumes no previous aviation activity at the site which was not the case up to May 2014 when the airport was still in operation. Consequently, the perceived magnitude of annoyance from aircraft noise to those communities listed above may not be as severe as predicted as many residents will

have experienced the noise effects of the airport in operation prior to 2014 albeit at a different intensity of use from that which is proposed.

- 9.96 The noise mitigation measures that are proposed will reduce the magnitude of adverse effects of aircraft noise as a result of the Proposed Development in line with the objectives set out in paragraph 123 of the NPPF however adverse effects will remain. In this sense, it is important to acknowledge the approach set out in the APF (paragraph 3.3) and the Airports NPS (paragraphs 5.54 and 5.55) which states that the Government wants to strike a fair balance between the negative impacts of noise (on health, amenity (quality of life) and productivity) and the positive economic impacts of flights and that as a general principle, the Government therefore expects that future growth in aviation should ensure that benefits are shared between the aviation industry and local communities. The proposed Noise Mitigation Plan allows for the community to benefit from finances payable by the airport operator and through penalties collected from noise breaches in addition to all the other benefits that that the Proposed Development will bring. In this sense, a fair balance will be struck.
- 9.97 Specifically in terms of significant community annoyance, it is relevant to note paragraph 3.17 of the APF. This states that the Government will continue to treat the 57dB LAeq 16 hour contour as the average level of daytime aircraft noise marking the approximate onset of significant community annoyance and this is what has been used in the noise assessment to calculate noise exposure from aircraft noise. However, the Government recognise that this does not mean that all people within this contour will experience significant adverse effects from aircraft noise and this is an important point to consider especially in light of the fact that many people within this contour could have been there when the airport was in operation pre-closure in 2014.
- 9.98 In accordance with paragraph 3.24 and Annex A of the APF and following completion of the Airspace Change Proposal, the airport operator commits to working with the appropriate air traffic service providers to ensure that particular weight to the management and mitigation of noise is afforded and that where possible, the airport operator will consider using the powers available to them to set suitable noise controls such as departure noise limits, minimum height requirements, noise-preferential routes and adherence to continuous descent approach. The Noise Mitigation Plan already makes some commitments and where appropriate, these will be enforced through proportionate penalties.
- 9.99 No significant impact on sleep disturbance is predicted due to the small number of night flights forecast (Chapter 15 of the ES) and the specific noise mitigation measures that are proposed during the night. Regardless, it is important to note paragraph 3.34 of the APF where the Government recognises the importance to the UK economy of certain types of flights, such as express freight services, which may only be viable if they operate at night. In accordance with paragraph 3.35 of the APF and paragraph 5.57 of the Airports NPS, RiverOak has made extra efforts to reduce and mitigate noise from night flights which have resulted in no significant impacts on sleep disturbance being predicted. This has included incentives to use the quietest aircraft at night (Airports NPS paragraph 5.62).
- 9.100 In line with paragraph 3.36 of the APF, the dwelling relocation scheme will be offered to households exposed to levels of noise of 69 dB LAeq,16h or more. Acoustic insulation to noise-sensitive buildings, such as schools and hospitals, exposed to levels of noise of 60 dB LAeq,16h will be offered which is an improvement on the APF requirement of 63 dB LAeq,16h. Financial assistance towards acoustic insulation for households is also offered (paragraph 3.38 of the APF).

- 9.101 In line with paragraph 5.64 of the Airports NPS, noise mitigation measures at the construction stage should also be provided through adopting a CEMP which will draw on best practice with due regard given to relevant British Standards and other guidance.
- 9.102 Paragraph 5.68 of the Airports NPS states that development consent should not be granted unless the Secretary of State is satisfied that the proposals will avoid *significant* adverse impacts on health and quality of life from noise; mitigate and minimise adverse impacts on health and quality of life from noise and contribute to improvements to health and quality of life. From the assessments presented notably in Chapters 12 and 15 of the ES, and because of the significant benefits of the Proposed Development which are considered to outweigh the likely adverse noise effects, development consent should be granted.

g) Air Quality

- 9.103 Paragraph 124 of the NPPF is relevant as are paragraphs 3.48, 3.49 and 3.51 of the APF and saved Policies EC2 and EP5 from the 2006 adopted Thanet Local Plan.
- 9.104 Paragraph 179 of the draft changes to the NPPF is also relevant but attracts less weight as it is the subject of ongoing consultation and could change.
- 9.105 The Airports NPS recognises at paragraph 5.23 that increases in emissions of pollutants during the construction or operational phases of a scheme could result in the worsening of local air quality and that increased emissions can contribute to adverse impacts on human health and on the natural environment. Paragraph 5.32 requires Applicant to undertake an air quality assessment of the project and for this to be included as part of the environmental statement, demonstrating that the proposed development (construction and operation) will not affect the UK's ability to comply with legal obligations. Failure to demonstrate this will result in refusal of development consent. Paragraph 5.33 states that the environmental statement should assess:
- Existing air quality levels for all relevant pollutants referred to in the Air Quality Standards Regulations 2010 and the National Emission Ceilings Regulations 2002 (as amended) or referred to in any successor regulations;
 - Forecasts of air quality at the time of opening taking account of the impact of the scheme, including when at full capacity; and
 - Any likely significant air quality effects, their mitigation and any residual likely significant effects, distinguishing between those applicable to the construction and operation of the scheme including any interaction between construction and operational changes and taking account of the impact that the scheme is likely to cause on air quality arising from road and other surface access traffic.
- 9.106 In terms of mitigation, paragraph 5.35 states that the Secretary of State will need to be satisfied that the mitigation measures put forward by the Applicant are acceptable, including at the construction stage. Suggested mitigation measures which may be put forward are listed in paragraph 5.39. Paragraph 5.40 states that mitigation measures at the construction stage should draw on best practice from other major construction schemes, including during the procurement of contractors. Specific measures could include but are not limited to:

- Development of a construction traffic management plan (which may include the possible use of rail and consolidation sites or waterways);
- The use of low emission construction plant / fleet, fitting of diesel particulate filters, and use of cleaner engines;
- The use of freight consolidation sites;
- Active workforce management / a worker transport scheme;
- Construction site connection to grid electricity to avoid use of mobile generation; and
- Selection of construction material to minimise distance of transport and increase recycling percentages of the material where appropriate.

9.107 In terms of decision making, paragraph 5.42 states that the Secretary of State will consider air quality impacts over the wider area likely to be affected, as well as in the vicinity of the scheme. In order to grant development consent, the Secretary of State will need to be satisfied that, with mitigation, the scheme would be compliant with legal obligations. Paragraph 5.43 states that air quality considerations are likely to be particularly relevant where the proposed scheme:

- is within or adjacent to Air Quality Management Areas, roads identified as being above limit values, or nature conservation sites (including Natura 2000 sites and Sites of Special Scientific Interest);
- would have effects sufficient to bring about the need for new Air Quality Management Areas or change the size of an existing Air Quality Management Area, or bring about changes to exceedances of the limit values, or have the potential to have an impact on nature conservation sites; and
- after taking into account mitigation, would lead to a significant air quality impact in relation to Environmental Impact Assessment and / or to a deterioration in air quality in a zone or agglomeration.

9.108 Chapter 6 of the ES [document reference TR020002/APP/5.2-1] provides the assessment of the effects of the Proposed Development on air quality. In accordance with paragraph 5.32 of the Airports NPS, the air quality assessment of the Proposed Development (construction and operation) demonstrates that it will not affect the UK's ability to comply with legal obligations. The air quality assessment provided in Chapter 6 of the ES considers all those issues required by paragraph 5.33 of the Airports NPS.

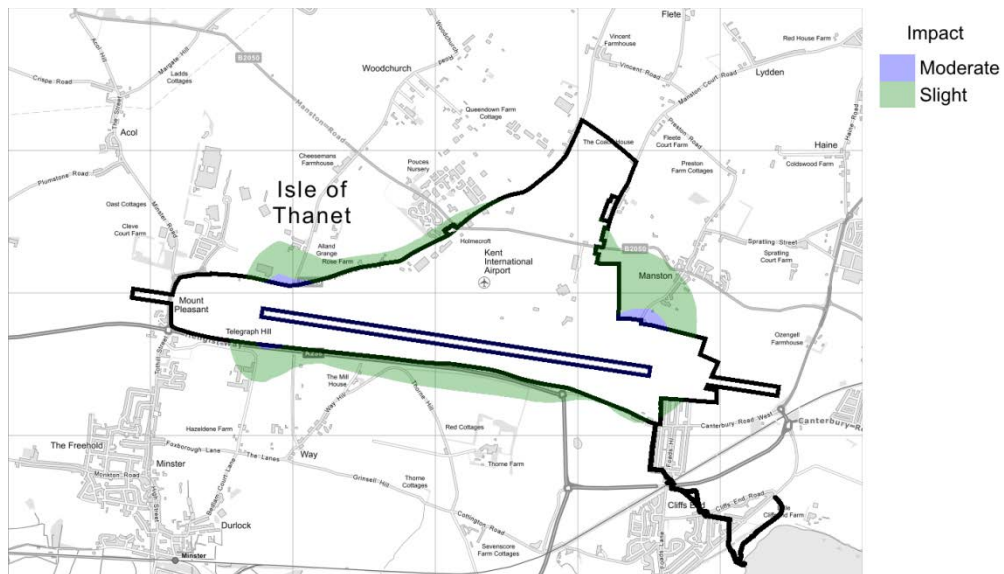
9.109 Section 6.1 of the ES chapter recognises that the nature of the modelling process means that it has not been possible to include the contribution from road traffic in contours that have been plotted on plans/maps, so when viewing the contour plots it should be borne in mind that concentrations close to major roads will be greater than those shown. However, the road traffic concentration has been included in the assessment of specific receptors where there is relevant exposure. For similar reasons, it has not been possible to include the contribution from road traffic in the ecological assessment of daily mean NO_x. The air quality assessment makes a number of worst-case assumptions, which means that air quality impacts are likely to be over-estimated. To assess how

significant the impacts are, recommendations from the Institute of Air Quality Management and the EA.

- 9.110 The main pollutants of concern for the Proposed Development are oxides of nitrogen (NO_x), nitrogen dioxide (NO₂) and fine particulate matter (PM₁₀ and PM_{2.5}). There is good evidence that elevated levels of PM₁₀ and PM_{2.5} have significant health effects, but concentrations are within legal limits across most of the country. There is more scientific uncertainty about the health effects of NO₂. However, concentrations of this pollutant are close to or above the legal limit in some urban areas. The legal limit for NO₂ is 40 µg m⁻³ as an annual mean concentration in locations where people are likely to be exposed. NO_x is not believed to have impacts on human health, but can affect vegetation and ecosystems.
- 9.111 In rural and suburban areas of Thanet, air quality is generally good and comfortably within legal limits. However, in some urban centres in Thanet close to busy roads, concentrations of NO₂ are close to legal limits and are considered to be high. An urban wide Air Quality Management Area (AQMA) has been declared in parts of Thanet to enable effective management of air quality (Thanet District Council Monitoring Report 2014). The boundary of the AQMA abuts the boundary of the airport and at its nearest point is just 180m from the centre of the runway (see Figure 6.1 in Chapter 6 of the ES). However, the nearest of the locations identified as having poor air quality (High Street, St. Lawrence, A255) is a roadside location approximately 2km east of the eastern end of the airport.
- 9.112 NO₂ is produced by combustion processes, including aircraft engines, road vehicle engines and boilers for heating homes and offices. PM₁₀ and PM_{2.5} are produced by the same processes in addition to wear from tyres and brakes on road vehicles and aircraft.
- 9.113 Concentrations of PM₁₀ and PM_{2.5} around the DCO application site are low and the Proposed Development will make a small contribution to pollutant concentrations. Concentrations will remain comfortably within legal limits.
- 9.114 Environmental measures have been incorporated into both the construction and operational phases of the Proposed Development in order to avoid, reduce or compensate for potential adverse air quality effects and these are set out in Section 6.6 of Chapter 6 of the ES. Such measures include a commitment to produce and implement a CEMP to include amongst other things, measures to reduce the risks from dust and to identify appropriate clean-up measures in a Dust Management Plan and avoiding the use of diesel or petrol-powered generators and ensuring that all vehicles switch off engines when stationary; planning aircraft arrival and departure schedules to avoid, where possible, over-long idling, taxiing and hold times and agreeing to enforce strict routeing agreements for HGVs avoiding where possible, peak traffic flows in order to reduce congestion and queuing. A Travel Plan is also proposed to encourage travel by sustainable modes.
- 9.115 The potential for effects include:
- Effects on human health and ecology during the airport's operational phase;
 - Effects from roads away from the airport; and
 - Effects from construction dust and decommissioning.

- 9.116 Existing concentrations of NO₂ around the airport are low and the Proposed Development will result in small increases although all locations will remain comfortably within legal limits. Impacts at some locations within approximately 500m of the airport boundary are classified as slight, and at some locations within approximately 100m of the airport boundary are classified as moderate (see Figure 9.1 below):

Figure 9.1: Impact on NO₂ concentrations from on-airport activity in the peak activity year (Year 20)



- 9.117 In the opening year, there are approximately 23 properties close to the A299 Thanet Way that would receive a slight impact from the road traffic arising from the Proposed Development however in later years the impact will be reduced to negligible as a result of improved vehicle emissions. Close to busy roads in the St. Lawrence area, the high existing concentrations mean the additional contribution from the operation of the Proposed Development, even though it is very small so far from the airport, is classified as having a slight impact. Impacts everywhere else are negligible.
- 9.118 In terms of impacts on ecological sites, some exceedances of the annual mean NO_x objective are predicted where major roads pass close to designated ecological sites, mainly because of levels of emissions from existing road traffic. The additional contribution from the Proposed Development, including airport-related traffic, is small, less than 7% of the objective at any major ecological site. The impact on air quality at local ecological sites is insignificant. Exceedances of the critical loads for nitrogen and acidity are predicted due to existing deposition rates, and the additional contribution from the Proposed Development is insignificant.
- 9.119 There are no significant human health or air quality effects as a result of the Proposed Development. The significance of effects from air quality on ecology is considered in Chapter 7 of the ES (Biodiversity).

Summary

- 9.120 The Proposed Development will sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of the nearby Air Quality

Management Area and opportunities to improve air quality or mitigate impacts have been identified in accordance with paragraph 179 of the draft changes to the NPPF. Improvements are expected in international standards to reduce emissions from aircraft and vehicles and this has been assumed within the air quality assessment. Specifically in accordance with paragraph 3.51 of the APF, the Proposed Development includes measures to reduce the air quality impacts from road traffic including a Travel Plan and a Construction Traffic Management Plan. The mitigation measures put forward are acceptable and they draw on best practice especially during the construction phases (paragraphs 5.35 and 5.40 of the Airports NPS). With mitigation, the Proposed Development is compliant with legal obligations (paragraph 5.42 of the Airports NPS). The Proposed Development is therefore in accordance with the relevant planning policies and provisions governing air quality.

h) Biodiversity and Ecological Conservation

- 9.121 Paragraphs 9, 109 and 118 of the NPPF are relevant as is paragraph 3.55 of the APF and saved Policies NC3 from the 2006 adopted Thanet Local Plan.
- 9.122 Paragraphs 168 and 173 of the draft changes to the NPPF are also relevant but attract less weight as they are the subject of ongoing consultation and could change.
- 9.123 The Airports NPS makes clear decisions under the Planning Act 2008 should complement but not duplicate those taken under the relevant pollution control regime and that these considerations apply in an analogous way to other environmental regulatory regimes, including biodiversity (paragraph 4.54).
- 9.124 Paragraph 5.89 of the Airports NPS states that the environmental statement submitted with an application for development consent should clearly set out any likely significant effects on internationally, nationally and locally designated sites of ecological or geological importance, protected species, and habitats and other species identified as being of principal importance for the conservation of biodiversity and identify how the effects on the natural environment will be influenced by climate change, and how ecological networks and their physical and biological process will be maintained. The ES (Chapter 7) includes an assessment of the potential effects on nationally and locally designated sites and species of nature conservation interest. For internationally designated sites, this chapter draws upon the Report to inform the Appropriate Assessment which is provided in Appendix 7.1 of Chapter 7 of the ES [document reference TR020002/APP/5.2-6]. The report provided in Appendix 7.1 provides the necessary information for the Secretary of State for Transport to undertake a Habitats Regulations Assessment (HRA) under the Conservation of Habitats and Species Regulations 2017 (the 'Habitats Regulations') (paragraph 1.33 of the Airports NPS).
- 9.125 In terms of mitigation, the Secretary of State will consider what requirements should be attached to any consent and/or in any planning obligations entered into in order to ensure that mitigation measures are delivered and monitored for their effectiveness and that account will be taken of any mitigation measures agreed between the applicant and Natural England, and whether Natural England has granted or refused, or intends to grant or refuse, any relevant licences, including protected species mitigation licences. The proposal should address the mitigation hierarchy (which supports efforts to conserve and enhance biodiversity), which is set out in the NPPF (paragraphs 5.91 to 5.93).

- 9.126 In terms of decision making, development should avoid significant harm to biodiversity and geological conservation interests, including through mitigation and consideration of reasonable alternatives. Biodiversity offsetting in devising compensation proposals is recommended to counteract any impacts on biodiversity which cannot be avoided or mitigated. Where significant harm cannot be avoided or mitigated, as a last resort appropriate compensation measures should be sought and long term management of such measures should be secured. Appropriate weight is to be attached to designated sites of international, national and local importance, protected species, habitats and other species of principal importance for the conservation of biodiversity, and to biodiversity and geological interests within the wider environment (paragraphs 5.95 and 5.96).
- 9.127 Chapter 7 of the ES [document reference TR020002/APP/5.2-1] provides the assessment of the potentially significant effects of the Proposed Development on biodiversity both within the DCO application site boundary and the surrounding area (where appropriate).
- 9.128 Section 7.3 of the ES chapter explains that due to a lack of full access to the site, and based on data gathered from the desk study, the surveying that was able to be carried out, existing baseline survey results and using professional judgement, likely worst-case effects have been considered in the assessment on biodiversity. Access permitting, additional baseline surveys are planned with the findings of these surveys allowing for refinement to the detailed biodiversity mitigation schemes that will be submitted for approval.
- 9.129 There are no designated nature conservation sites within the DCO site application boundary, although a number occur outside the airport including designated sites of European importance, such as the Thanet Coast and Sandwich Bay Special Protection Area (SPA) and Ramsar sites. The desk study has indicated the presence of statutory sites within the Zone of Influence associated with the environmental changes that are likely to affect the assessed receptors including 2 Ramsar sites; 2 Special Protection Areas; 4 Special Areas for Conservation; 3 National Nature Reserves; 5 Sites of Special Scientific Interest; 2 Local Nature Reserves and 1 Site of Community Importance (Table 7.6 of Chapter 7 of the ES).
- 9.130 The site, comprised largely of mown grassland and tarmac/runway, has limited biodiversity value. Bat activity on site is limited mainly due to the low value foraging and the lack of shelter as there are few trees and hedgerows. However, roosts (both summer and hibernation) are present in some of the buildings, although the majority of these are large and unsuitable for bat roosts.
- 9.131 Breeding birds onsite include several species that have conservation interest including skylark and grey partridge, which will be affected by the Proposed Development.
- 9.132 With respect to reptiles, a single lizard was recorded at the airport boundary. A few small areas (totalling about 4ha) of the site could not be accessed in 2017 for reptile surveys; it is anticipated that these will be surveyed in 2018. These areas provide good habitat for reptiles and the worst case scenario has been assumed for the assessment – that is that they will be likely to contain high populations of common lizard and slow worm.
- 9.133 The mown grassland, tarmac, concrete and buildings which comprise the majority of the site, do not provide much value to terrestrial invertebrates. However, and in the worst case scenario which has been assessed, smaller unmanaged areas are expected to have invertebrate interest, which will be determined by surveys in 2018.

9.134 Section 7.5 in the ES chapter (and specifically Table 7.7) sets out the environmental measures that have been incorporated into the Proposed Development to avoid, reduce or compensate for potential adverse biodiversity effects. These include

- An outline drainage strategy has been developed (see Chapter 3 of the ES) to mitigate against potential pollution/eutrophication from site discharges and possible effects on designated sites. The drainage 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 set to the site treatment facilities (attenuation ponds). Discharge from these ponds will be via a permitted discharge to Pegwell Bay. Discharge of treated water to Pegwell Bay, rather than to ground, with appropriate monitoring of water quality will ensure quality standard is maintained.
- 36ha of off-site habitat creation to compensate for the expected habitat loss with habitats being managed specifically for biodiversity value of a higher quality than that occurring on the site. A Mitigation and Habitat Creation Plan (MHCP) (Appendix 7.13 of Chapter 7 of the ES) details the off-site habitat creation proposed as part of the mitigation and compensation package);
- Adhering to the CEMP;
- Replacement roosts, under a licence from Natural England, are to be provided offsite, due to the activity, noise and lighting associated with the Proposed Development, on land which is to be enhanced for foraging bats with features to provide better linkage for commuting bats to the wider environment;
- Compensation land to the south of the site is to be managed specifically with the nesting requirements of the protected bird species known to be at the site with habitats provided to offset any losses of breeding pairs on-site. Similarly, a barn owl nest on site is to be re-located to remove it from birdstrike risk and risk of collision with traffic from adjacent roads;
- Under this worst-case scenario (and depending on what is assessed once further site surveys have been completed), reptiles would be re-located to another site, comprising of habitat specifically designed for reptiles; and
- Under this worst-case scenario (and depending on what is assessed once further site surveys have been completed), some of the features on-site that provide good invertebrate habitat, for example, the stressed vegetation growing along the runways, will be maintained for the operational phase of the Proposed Development. In addition, diverse open mosaic habitats are to be created in compensation for loss of the unmanaged areas on-site.

9.135 The potential for effects include (Section 7.6 of Chapter 7 of the ES):

- Land-take/ land cover change/ construction;
- Increased light, noise and vibration;
- Increased vehicle movements;
- Pollution (contamination/eutrophication),

- Air quality changes, including dust deposition and emissions;
- Combined effects - when individual effects of the proposed development combine to create a cumulative effect; and
- Interactive effects - consideration of interactions between different effects in relation to a specific receptor.

9.136 Table 7.19 in Chapter 7 of the ES confirms that the Proposed Development will not result in any significant effects on biodiversity including on European designated sites.

Summary

9.137 The Proposed Development will not result in significant harm to biodiversity interests in accordance with paragraph 5.96 of the Airports NPS. The Proposed Development will in fact minimise impacts on biodiversity and provide net gains (Paragraphs 9 and 109 of the NPPF; paragraph 168 of the draft changes to the NPPF and paragraph 3.55 of the APF). No significant harm to biodiversity is expected because of the environmental, mitigation and compensation measures that have been proposed and opportunities to enhance the biodiversity offer of the Proposed Development have been taken (paragraph 118 of the NPPF). The further surveys that are required will help to refine the mitigation measures that have been proposed in accordance with the mitigation hierarchy set out in the NPPF (paragraph 112). Details of other consents and licences that may be required are provided in document reference TR020002/APP/7.6 which is submitted with the DCO application. The Proposed Development is therefore in accordance with the relevant planning policies and provisions governing biodiversity.

i) Landscape and Visual

9.138 Paragraph 109 of the NPPF is relevant as is paragraph 3.55 of the APF and saved Policies CC2, EC2, EP9 and NC3 from the 2006 adopted Thanet Local Plan.

9.139 Paragraphs 168 and 170 of the draft changes to the NPPF are also relevant but attract less weight as they are the subject of ongoing consultation and could change.

9.140 Paragraph 5.214 of the Airports NPS states that where development is subject to an Environmental Impact Assessment, that the applicant should undertake an assessment of any likely significant landscape and visual impacts and describe them in the environmental statement. The landscape and visual assessment should reference any landscape character assessment and associated studies as a means of assessing landscape impacts relevant to the preferred scheme. In addition, the applicant's assessment should take account of any relevant policies based on these assessments in local development documents. Paragraph 5.215 states that the assessment should include any significant effects during construction and/or the significant effects of the completed development and its operation on landscape components and landscape character, including historic characterisation. This should include assessment of any landscape and visual impacts as a result of the development, for example surface access proposals or aviation activity. Paragraph 5.216 states that the assessment should include the visibility and conspicuousness of the preferred scheme during construction and the presence and operation of the preferred scheme and potential impacts on views and visual amenity. This should include any noise and light pollution effects, including on local amenity, tranquillity and nature conservation.

- 9.141 The Airports NPS (paragraph 5.213) states that for airport development, landscape and visual effects also include tranquillity effects. It also clarifies that references to landscape should be taken as covering local landscape, waterscape and townscape character and quality, where appropriate. Paragraphs 5.214 to 5.216 state that the Landscape and Visual Impact Assessment (LVIA) should reference any landscape character assessment and associated studies as a means of assessing landscape impacts. In taking decisions, the Secretary of State will consider whether the preferred scheme has been designed carefully, taking account of environmental effects on the landscape and siting, operational and other relevant constraints, to avoid adverse effects on landscape or to minimise harm to the landscape, providing reasonable mitigation where possible and appropriate (paragraph 5.218). In terms of visual impacts, paragraph 5.225 states that the Secretary of State will judge whether the visual effects on sensitive receptors, such as local residents, and other receptors, such as visitors to the local area, outweigh the benefits of the development.
- 9.142 Chapter 11 of the ES [document reference TR020002/APP/5.2-2] sets out the results of an assessment of the landscape and visual effects of the Proposed Development. Landscape effects and visual effects are closely related, but do form separate assessments, the former relating to landscape and areas of landscape character, and the latter relating to the visual effects on views and visual amenity as experienced by people. The Landscape and Visual Impact Assessment (LVIA) study area is all areas within 5 km of the site. 22 photographic viewpoint locations are used in the LVIA (Table 11.3 of Chapter 11 of the ES). Zone of Theoretical Visibility (ZTV) maps have also been prepared to assess various components of the Proposed Development. These include ZTVs that illustrate the potential visibility of the permanent structures and buildings as part of the Proposed Development based a number of fixed parameters.
- 9.143 In terms of limitations associated with the assessment, Section 11.1 of Chapter 11 recognises that the 3D visualisations of the Proposed Development as included in the Design and Access Statement [document reference TR020002/APP/7.3] and in Figures 3.6 to 3.9 of Chapter 3 of the ES [document reference TR020002/APP/5.2-4] have been used to inform the LVIA in terms of the apparent scale and massing of the Proposed Development only. The final details of the proposed architectural form of buildings and materials are not known at this stage and have not influenced the assessment. The final assessment will supplement but not supersede the assessments made in Chapter 11. Finally, fixed building footprints are yet to be defined in the Northern Grass area as is the final landscaping layout (except for some fixed 45m wide buffer zones adjacent to sensitive visual residential receptors) so as to allow for flexibility for future design. None of these limitations invalidate the assessments made in Chapter 11.
- 9.144 The Proposed Development site and its immediate surroundings are located at an elevation of between 40m and 55m AOD. To the south and west of the site, the River Stour and the River Wantsum with their surrounding marshland areas which have a lower topography of approximately 10-30 m AOD. The western edges of Ramsgate and Broadstairs extend westwards at elevations which are comparable to that of the proposed development site of between 40m and 50m AOD. In the north and east of the study area, the towns of Birchington, Margate, Broadstairs and Ramsgate all occupy elevations of between 5m and 50m AOD and are characterised by steep chalk cliff faces down to the sea. Within the LVIA study area beyond the proposed development site boundary, there are a range of land uses with the primary one being arable fields which cover approximately 60% of the land in the south, west and centre of the LVIA study area. Figure 11.34 to Chapter 11 of the ES shows the network of long distance walking and cycling routes within the study area. Public Rights

of Way (PRoW) and Bridleways are shown on Figure 11.36. Figure 11.38 illustrates the tranquillity mapping based on the Campaign to Protect Rural England's Tranquillity Mapping and Figure 11.39 illustrates the CPRE's 'Night Blight' mapping (England's light pollution and dark skies).

- 9.145 In terms of landscape character the proposed development site and the LVIA study area are located entirely within the National Character Area (NCA) 113: North Kent Plain. The NCA comprises an open, low and gently undulating landscape characterised by its arable use. The chalk outlier of Thanet, on which the proposed development site is located, is identified as a key feature that is a discrete and distinct area characterised by its dominant agricultural use stemming from the highly quality, fertile soils. The regional and local character areas affecting the site and surrounding area are listed in Section 11.4 (Table 11.10) of the ES chapter. There are landscape designations within the LVIA study area.
- 9.146 The environmental measures incorporated into the Proposed Development to avoid, reduce or compensate for potential adverse landscape and visual effects are listed in Table 11.11 in Section 11.5 of Chapter 11 of the ES. These measures include new tree planting and landscaping to screen and soften large-scale built forms proposed along the southern side of Manston Road and around the airport business park (Northern Grass); localised bunding to offer screening and provision of an illustrative Landscape Masterplan.
- 9.147 Section 11.6 of the ES chapter lists the potentially significant effects which are summarised below:
- Potential effects on landscape character as a result of the construction and operational activity associated with the redevelopment and reopening of Manston Airport. The assessment has been undertaken upon the limited number of Dover and Thanet LCAs that are completely or partially located within the study area and the development ZTV.
 - Potential effects upon NCA 113 – North Kent Basin.
 - Potential effects upon tranquillity, primarily as a result of increased noise and the visual presence of overflying of aircraft have been assessed within the context provided by the defined key characteristics of the different LCAs.
 - Potential effects upon the views and visual amenity of visual receptors within the LVIA study area and Proposed Development ZTV as a result of construction activity required to reopen Manston Airport. These will be principally the construction activities required for the cargo facility, ATC tower, fuel farm, hangars and new aircraft stands.
 - Potential effects upon the views and visual amenity of visual receptors within the LVIA study area and the Proposed Development ZTV as a result of the operation of the reopened Manston Airport. These will be principally the operational activities at the cargo facility, fuel farm, hangars and new aircraft stands but will also include the movements of aircraft on the ground and when taking off and landing (air traffic movements – ATMs) and movement of vehicles and plant within and around the Proposed Development.
- 9.148 The assessment has considered the potential for the Proposed Development to result in significant landscape effects in relation to the following twelve landscape receptors:
- National Character Area 113: North Kent Plain;

- Kent Historic Landscape Character Area 18: Isle of Thanet;
- Thanet Landscape Character Areas:
 - A1: Manston Chalk Plateau;
 - B1: Wantsum North Shore;
 - C1: St Nicholas-at-Wade Undulating Chalk Farmland;
 - C2: Central Thanet Undulating Chalk Farmland;
 - C3: St Peters Undulating Chalk Farmland;
 - D1: Quex Park;
 - E1: Stour Marshes;
 - E2: Wade Marshes; and
 - F1: Pegwell Bay
- Dover Landscape Character Areas:
 - Ash Level;
 - Richborough Castle;
 - The Sandwich Corridor; and
 - Sandwich Bay.

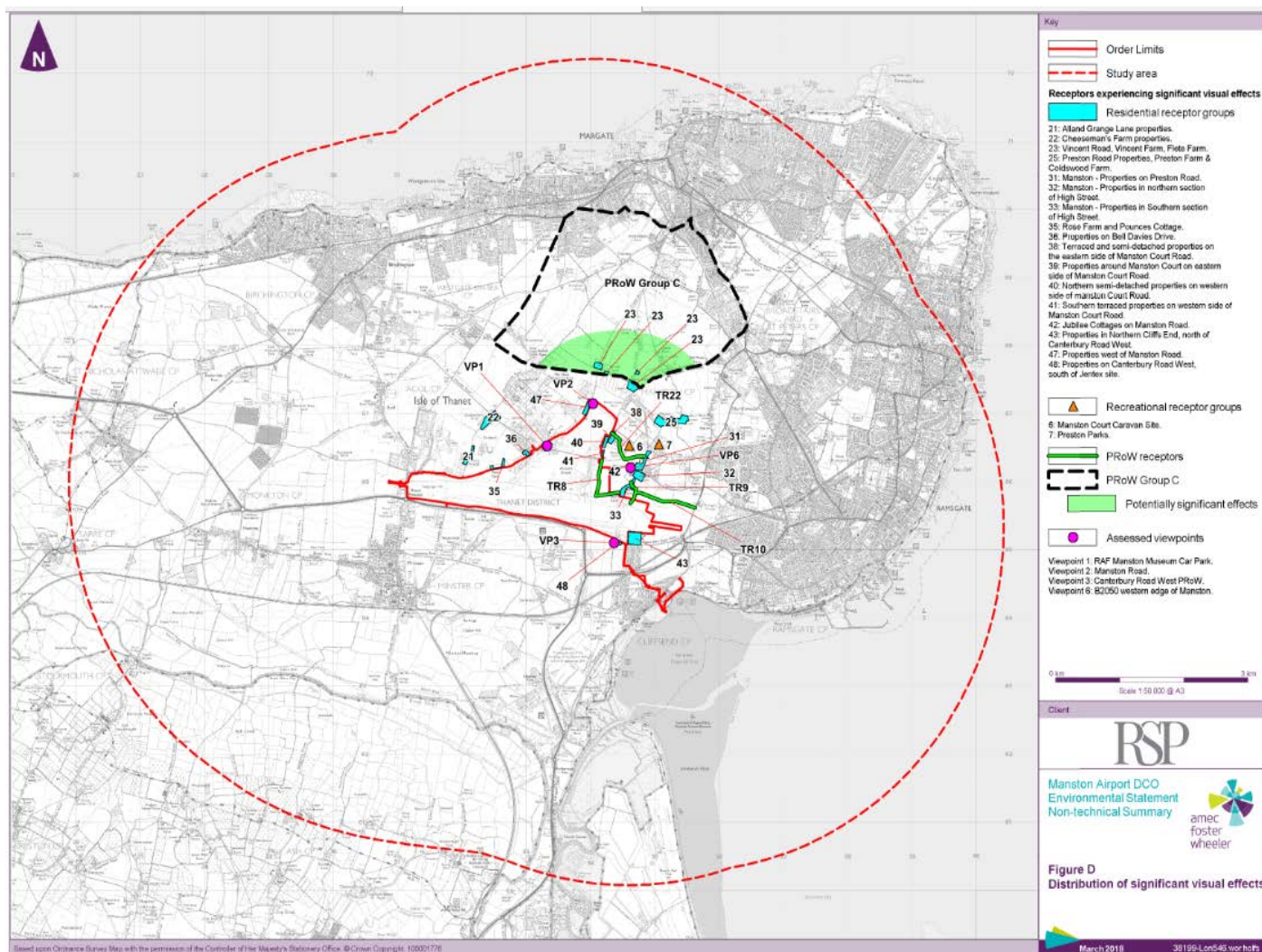
9.149 No significant landscape effects have been predicted to occur at any of these locations during construction and operation.

9.150 The assessment has also considered the potential for the Proposed Development to result in significant visual effects in relation to the following 121 visual receptors and visual receptor groups:

- People at their place of residence (48 individual properties or groups of properties);
- People engaged in outdoor recreation (41 individual recreational facilities or groups of recreational facilities);
- People using the transport network (10 routes); and
- Photographic viewpoint locations (22 locations).

9.151 The Proposed Development may have the potential to result in significant visual effects in relation to visual receptors located at 17 individual properties or groups of properties; nine individual recreational facilities or groups of recreational facilities; ten transport routes; and four photographic viewpoint locations (Table 11.133 of Chapter 11 of the ES). These are identified on Figure 9.2 below:

Figure 9.2 : Distribution of Potentially Significant Visual Effects



Summary

- 9.152 No significant landscape effects are predicted but the assessment has shown that significant effects on visual receptors are expected as a result of the Proposed Development even with the measures embedded into the Proposed Development to avoid, reduce and compensate for adverse effects. However, this is based on a worst case assessment until further detail is known about the exact location and visual appearance of the new built development; the final Lighting Scheme and the final Landscaping Scheme. Once this detail is known, and with a commitment to ensure that adverse effects are mitigated as much as possible through the detailed design stages, this will reduce the magnitude of the adverse effects predicted. Any resultant harm is not expected to be substantial or sufficient to warrant refusal because the substantial benefits of the Proposed Development outweigh any harm (paragraph 3.55 of the APF and paragraph 5.225 of the Airports NPS). Furthermore, the built development that is proposed is contained within a site boundary which largely matches the existing airport boundary thereby containing development to an area where expansion is already

permitted and assumed by saved Policy EC2 of the 2006 Thanet Local Plan. The Proposed Development is therefore in accordance with the relevant planning policies and provisions governing landscape and visual impact.

j) Built Heritage/Historic Environment

- 9.153 Paragraphs 9, 131, 132, 133, 134 and 140 of the NPPF are relevant as is paragraph 3.55 of the APF and saved Policies HE11 and HE12 from the 2006 adopted Thanet Local Plan.
- 9.154 Paragraphs 185-6, 188-9 and 191-202 of the draft changes to the NPPF are also relevant but attract less weight as they are the subject of ongoing consultation and could change.
- 9.155 Paragraph 5.187 of the Airports NPS recognises that construction and operation of airports and associated infrastructure has the potential to result in adverse impacts on the historic environment above and below ground. This could be as a result of the scale, form and function of the development, and the wider impacts it can create in terms of associated infrastructure to connect the airport to existing transport networks, changes in aircraft movement on the ground and in the surrounding airspace, additional noise and light levels, and the need for security and space to ensure the airport's operation.
- 9.156 The Airports NPS requires that the environmental statement should provide a description of the significance of the heritage assets affected by the proposed development, and the contribution of their setting to that significance. Detailed studies will be required on those heritage assets affected by noise, light and indirect impacts. Paragraph 5.195 encourages, where opportunities exist, to prepare proposals which can make a positive contribution to the historic environment, and to consider how their scheme takes account of the significance of heritage assets affected.
- 9.157 In determining applications, the Secretary of State will seek to identify and assess the particular significance of any heritage asset that may be affected by the proposed development (including by development affecting the setting of a heritage asset), taking account of the available evidence (paragraph 5.196 of the Airports NPS). Account will be taken of the particular nature of the significance of the heritage asset and the value that they hold for this and future generations.
- 9.158 Substantial harm to or loss of a Grade II Listed Building or a Grade II Registered Park or Garden should be exceptional. Substantial harm to or loss of designated sites of the highest significance, including World Heritage Sites, Scheduled Monuments, Grade I and II* Listed Buildings, Protected Wreck Sites, Registered Battlefields, and Grade I and II* Registered Parks and Gardens should be wholly exceptional. Any harmful impact on the significance of a designated heritage asset should be weighed against the public benefit of development, recognising that the greater the harm to the significance of the heritage asset, the greater the justification that will be needed for any loss. Where the proposed development will lead to substantial harm to or the total loss of significance of a designated heritage asset, the Secretary of State will refuse consent unless it can be demonstrated that the substantial harm or loss of significance is necessary in order to deliver substantial public benefits that outweigh that loss or harm (paragraph 5.204).
- 9.159 Chapter 9 of the ES [document reference TR020002/APP/5.2-1] provides the assessment of the Proposed Development in relation to the Historic Environment. In accordance with the Airports NPS,

it includes a description of the significance of the heritage assets affected by the proposed development, and the contribution of their setting to that significance.

- 9.160 Section 9.1 of the ES chapter recognises that whilst the assessment is based on visits to the site, the Northern Grass area has not been subject to intrusive investigation. This potential for previously unrecorded archaeological remains has been considered within the ES and appropriate environmental measures are set out to ensure that these effects can be managed. Kent County Council and Historic England have identified a potential need for further intrusive investigations particularly on the Northern Grass. An Archaeological Written Scheme of Investigation will be prepared in consultation with Kent County Council (KCC). For this reason, the assessment presents a 'worst-case scenario' approach.
- 9.161 The site lies within an area of local and regional historic significance due to its location on the Isle of Thanet. There are no World Heritage Sites (WHS) within the study area. There are two Scheduled Monuments (SM) within the 1km study area which are both within close proximity to the site (Anglo-Saxon Cemetery south of Ozengell Grange and Enclosure and Ring Ditches sited 180m east-northeast of Minster Laundry). There are no listed buildings within the site, however there are 24 listed buildings surrounding the site within the 1km study area (all Grade II apart from 3 Grade II* buildings). The Conservation Area of Acol lies partially within the 1km study area. There are no Registered Parks and Gardens (RPG) within a 1km radius around the site. There are no Registered Battlefields in Kent. In terms of non-designated heritage assets there are over 800 previously identified non-designated archaeological features within the site and the 1km study area, including archaeological remains from the prehistoric through to the medieval period onwards, including various phases of use of the airport, which are evidence of long term human activity within the area.
- 9.162 Environmental measures have been incorporated into both the construction and operational phases of the Proposed Development in order to avoid, reduce or compensate for potential adverse effects on heritage assets and these are set out in Section 9.5 of Chapter 9 of the ES. Such measures include flexibility being inherent in the masterplanning process which will mean that harm and loss of archaeological interest will be avoided or minimised; using existing features including the runway and areas of hardstanding to minimise disturbance and intrusive works; reusing and/or relocating historic structures where feasible into the museums; landscaping treatment to screen or reduce views of the airport and incorporating noise mitigation measures within the airport boundary to reduce noise effects.
- 9.163 The potential for effects include:
- Potential disturbance of sub-surface archaeological remains dating to the Prehistoric, Roman, Early-Medieval, Medieval and Modern periods occurring during the construction phase;
 - Potential effects on the heritage significance of the airport and surviving built heritage assets relating to military and civilian uses of the site from the First World War onwards, particularly the RAF Battle HQ, RAF Control Tower and the runway, occurring during the construction phase;
 - Potential effects arising through change in the setting of non-designated heritage assets within the Proposed Development boundary; and

- Potential effects arising through change in the setting of designated heritage assets outside the Proposed Development boundary, including the Grade II listed Cleve Court and Cleve Lodge and the scheduled enclosure and ring ditches at Minster Laundry, from visibility of new infrastructure and aviation noise.

9.164 Section 9.11 of Chapter 9 of the ES provides conclusions on the significance of the effects that have been assessed and states the following:

- further survey of potential archaeological remains within the site boundary will be conducted at the earliest opportunity. These will provide the information required to allow design of the Proposed Development to avoid the most significant archaeological remains and limit the effects on buried heritage assets. This investigation will also allow a scheme of archaeological investigation to be developed to ensure that archaeological remains which would be disturbed by the Proposed Development to be appropriately recorded. In the absence of mitigation, however, it is anticipated that effects potentially would be significant and adverse. Mitigation by archaeological investigation and avoidance measures will be applied once the results of the further survey work are known.
- further surveys of non-designated built heritage assets within the site boundary will be conducted at the earliest opportunity to establish the condition, desirability and feasibility for their retention in the final design. Those not retained will be subject to an appropriate level of building recording during the construction phase. In the absence of this mitigation, the effects on built heritage assets could potentially be significant and adverse.
- changes to the setting of retained non-designated heritage assets will occur on the site during the construction and operational phases. However, re-use of the airfield for aviation purposes reflects the recent historic use of the site and it is not anticipated that these effects are not likely to be significant. The effect of changes to the setting of designated heritage assets was assessed to be not significant.
- indirect effects on off-site heritage assets have been considered in line with Historic England guidance on assessing change to setting and aviation noise. In the majority of cases, effects have not been assessed as being likely to be significant, although it is considered that significant adverse effects may potentially arise at the Grade II listed buildings at Cleve Court and Cleve Lodge and at Wayborough House and Way House as a result of operational noise from the Proposed Development. It is possible that these building could qualify for measures included in the Noise Mitigation Plan [document reference TR020002/APP/2.4] which would reduce the magnitude of any adverse effect but not sufficiently to avoid a significant effect.

Summary

9.165 The additional survey work and building recording that is being proposed once site access can be secured; the commitment to develop a scheme of archaeological investigation with KCC to ensure that archaeological remains which would be disturbed by the Proposed Development would be appropriately recorded and the benefits to the off-site heritage assets whose settings may be affected by aviation noise through measures included in the Noise Mitigation Plan all offer appropriate mitigation which will reduce the magnitude of the adverse effects predicted. Any resultant harm is not expected to be substantial or sufficient to warrant refusal because the substantial public benefits

of the Proposed Development outweigh any harm (paragraph 133 of the NPPF; paragraph 192 of the draft changes to the NPPF and paragraph 5.205 of the Airport NPS). The Proposed Development is therefore in accordance with the relevant planning policies and provisions governing the historic environment.

k) Water Resources (including Flood Risk)

- 9.166 Paragraphs 100 and 109 of the NPPF are especially relevant as is paragraph 3.55 of the APF and saved Policy EP13 from the 2006 adopted Thanet Local Plan.
- 9.167 Paragraphs 154, 161, 163 and 168 of the draft changes to the NPPF are also relevant but attract less weight as they are the subject of ongoing consultation and could change.
- 9.168 Paragraph 5.172 of the Airports NPS recognises that airport infrastructure projects can have adverse effects on the water environment, including groundwater, inland surface water and transitional waters. During construction and operation, it can lead to increased demand for water, involve discharges to water, and cause adverse ecological effects resulting from physical modifications to the water environment. There may also be an increased risk of spills and leaks of pollutants to the water environment. These effects could lead to adverse impacts on health or on protected and other species and habitats, and could, in particular, result in surface waters, groundwaters or protected areas.
- 9.169 Paragraph 5.175 of the Airports NPS recommends that the applicant should make sufficiently early contact with the relevant regulators, including the EA, for abstraction licensing and environmental permitting, and with the water supply company likely to supply the water. The Applicant has been in regular discussion with these bodies throughout the design development stage of the project given the aquifer that underlies the site. Paragraph 5.186 states that if the EA continues to have concerns, and objects to the grant of development consent on the grounds of impacts on water quality/resources, that the Secretary of State can grant consent, but will need to be satisfied that all reasonable steps have been taken by the applicant and the EA to try to resolve the concerns.
- 9.170 In accordance with the Airports NPS, the Applicant has submitted a Flood Risk Assessment which is provided as Appendix 8.2 of Chapter 8 of the ES [document reference TR020002/APP/5.2-8] and which identifies and assesses the risks of all forms of flooding to and from the preferred scheme, and demonstrates how these flood risks will be managed, taking climate change into account. The Applicant has also submitted a Hydrogeological Impact Assessment which is provided as Appendix 8.1 of Chapter 8 of the ES [document reference TR020002/APP.5.2-7] and a Water Framework Directive Assessment (Appendix 8.3 of Chapter 8 of the ES – document reference TR020002/APP/5.2-8).
- 9.171 When determining an application, the Secretary of State will need to be satisfied that flood risk will not be increased elsewhere and will only consider development appropriate in areas at risk of flooding where, informed by a flood risk assessment, following the Sequential Test and, if required, the Exception Test (paragraph 5.167).
- 9.172 Chapter 8 of the ES [document reference TR020002/APP/5.2-1] provides the assessment of the effects of the Proposed Development on the freshwater environment (including potential effects on water quality, resources and flood risk).

- 9.173 Section 8.1 of the ES chapter confirms that constraints on land access have meant that no intrusive investigations have been undertaken to inform the application but that the scope of any works post-consent will be agreed with the EA, Thanet District Council and Southern Water prior to commissioning. The assessment has been undertaken using available desk-based and modelling information and considers the worst case scenario in light of the limitations.
- 9.174 There are no river watercourses on or adjacent to the site, partly due to the high permeability of the underlying chalk. The DCO application site boundary encompasses the line of a buried pipeline to Pegwell Bay, which extends from the southern portion of the site at about 50m AOD to the outfall point in Pegwell Bay.
- 9.175 The Manston Airport site is underlain by a Principal aquifer, associated with the underlying chalk, which can provide high levels of water storage. This aquifer supports local Public Water Supplies (PWS). The Thanet Formation has been classed as a Secondary A aquifer by the EA. A Secondary A aquifer is defined as a permeable layer capable of supporting water supplies at a local rather than strategic scale. The Manston Airport site is located entirely within a groundwater SPZ catchment. The inner zone (SPZ1), where risk of contamination from pollution causing activities is greatest, is identified in an area at the eastern end of the site and in a strip beneath the runway. This is surrounded by a wider area of outer zone (SPZ2) that also dominates the area beneath the runway, in the south of the site. The remainder of the site falls within the wider SPZ catchment area (SPZ3). The entire Manston Airport site is also located within a Safeguard Zone (SGZ) and a groundwater Nitrate Vulnerable Zone (NVZ).
- 9.176 There are no licensed abstractions located within the Manston Airport site boundary, but a number of people and organisations are licensed to abstract water from groundwater or ponds/lakes up to 1km outside the main site boundary. The abstractions are for private water undertaking, PWS and agriculture.
- 9.177 Two historic permitted discharges have been identified within the Manston Airport site. These are a discharge consent held by the Modern Jet Support Centre Ltd, which discharged site drainage to land, and was revoked in 2004; and a discharge consent held by Kent International Airport Ltd which allowed drainage from the runway and apron areas to discharge to Pegwell Bay via a pipe located on the southern edge of the airport. Discharge was pumped (against topographic gradient) from the site to this pipe.
- 9.178 EA flood mapping indicates that the whole of the Manston Airport site is located within an area where flooding from rivers and the sea is very unlikely (Flood Zone 1, where there is a less than 0.1% (1 in 1000) chance of flooding occurring each year). The nearest flood risk is coastal flooding associated with Pegwell Bay, located approximately 2km south east of the site. There is no risk of flooding to the site from reservoirs.
- 9.179 In terms of site drainage, the site has a significant north - south fall, with the runway at the site's highpoint. The main site outfall is at the south-eastern site boundary, and comprises a large diameter (up to 1200mm) pipe which travels on a south easterly trajectory, discharging into Pegwell Bay. The pipe is not under any ownership and will be subject to a compulsory purchase order upon granting of the DCO. An existing pumping station is located adjacent to the passenger apron. This supplies a 300mm diameter pipe that runs along the site's western boundary and enters into a gravity system around the runway threshold. This then runs along the site's southern edge before discharging into

the outfall to Pegwell Bay. The condition of the pipe and outfall in Pegwell Bay has been surveyed to support the DCO application. A survey in April 2017 indicated that the pipe and outfall are in good condition, but that some work may need to be done to repair the scour-protection infrastructure at the discharge end of the pipe. Further details are provided as part of the outline proposed drainage strategy which is provided in Appendix 8.2 of Chapter 8 of the ES.

- 9.180 Environmental measures have been incorporated into both the construction and operational phases of the Proposed Development in order to avoid, reduce or compensate for potential adverse effects on the freshwater environment are set out in Section 8.5 of Chapter 8 of the ES. Such measures include those proposed as part of the drainage strategy to prevent pollution of the water environment including no infiltration for any areas of hardstanding and including site treatment facilities, including attenuation ponds and ensuring that the fuel storage tanks have been designed to current standards or higher to prevent any risk of leakage into the groundwater environment as a pollutant. Particular focus has been given to measures to protect the Lord of the Manor source (and associated groundwaters) from any risk of a fuel leak from the proposed fuel farm. Appropriate measures and design standards have been discussed with both Southern Water and the EA to ensure that these highly sensitive features are protected from any breaches or spills.
- 9.181 Management plans to protect the freshwater environment from any adverse impact on the quality or quantity of freshwater resources, water supply infrastructure and foul sewerage infrastructure are also proposed to be adopted. These include a CEMP, Environmental Management Plan (EMP), Emergency Spill Response Plan and a Code of Construction Practice (CoCP).
- 9.182 The Flood Risk Assessment which includes the Drainage Impact Assessment demonstrates that there will be no increase in flood risk from any source from the proposed site operations. The Hydrogeological Impact Assessment assesses the risk to groundwaters and dependant abstractions from site operations and has been supported by quantitative modelling to understand the relationship between the site and the Southern Water abstraction boreholes.
- 9.183 The potential for effects include:
- Potential effects on the groundwater quality in the Chalk WFD groundwater body and aquifer, the Thanet Formation Secondary A Aquifer and the dependent abstractions during the construction and operational phases of the Proposed Development including an increase in turbidity of the underlying groundwater, or pollution from the leakages and spillages of oils, fuels or other chemicals;
 - Potential effects on Monkton and Minster Marshes (River) WFD surface water body and downstream River Stour WFD transitional water body during the construction and operational phases of the Proposed Development including from site run-off during the construction phase, or from surface water discharges during the operational phase;
 - Potential effects on Pegwell Bay (and associated designated sites) during the construction and operational phases of the Proposed Development including through the proposed use of the existing surface water discharge system, which discharges into Pegwell Bay;
 - Potential effects on the capacity of the public water supply network and public sewer network during the construction and operational phases of the Proposed Development including from

the increase in demand for potable water supply and for foul water connections during both phases of the development; and

- Potential effects on flood risk receptors on and adjacent to the Proposed Development during the construction and operational phases of the Proposed Development including changes to site drainage and discharge.

9.184 Section 8.13 of Chapter 8 of the ES provides conclusions on the significance of the effects that have been assessed. Given that appropriate mitigation measures have been designed to protect the freshwater environment, there will not be any significant surface or hydrogeological impacts.

Summary

9.185 The Proposed Development will not result in unacceptable levels of water pollution (NPPF paragraph 109 and paragraph 168 of the draft changes to the NPPF) or any significant impacts on water resources (paragraph 3.55 of the APF). During the construction and operational phases, environmental measures are proposed to avoid, reduce or compensate for adverse effects including risks of spills and leaks of pollutants and adverse ecological effects (paragraph 5.172 of the Airports NPS).

9.186 In accordance with paragraph 5.175 of the Airports NPS, RiverOak has made sufficiently early contact with the relevant regulators, including the EA, for abstraction licensing and environmental permitting, and with the water supply company likely to supply the water (Southern Water). Chapter 8 of the ES includes full details of the consultation carried out with these bodies. These discussions will continue. However, the advice in paragraph 5.186 of the Airports NPS is noted where it states that if the EA continue to have concerns, and objects to the grant of development consent on the grounds of impacts on water quality/resources, that the Secretary of State can grant consent, but will need to be satisfied that all reasonable steps have been taken by the applicant and the EA to try to resolve the concerns.

9.187 In terms of flood risk, the site is located in an area with the lowest risk from flood in accordance with paragraph 100 of the NPPF and paragraph 154 of the draft changes to the NPPF. The Proposed Development will not increase flood risk elsewhere (paragraph 161 of the draft changes to the NPPF and paragraph 5.167 of the Airports NPS).

9.188 The Proposed Development is therefore in accordance with the relevant planning policies and provisions governing the water environment and flood risk.

I) Traffic and Transportation/Surface Access

9.189 Paragraphs 29, 32 and 34 to 36 of the NPPF are relevant as is paragraph 5.11 and Annex B of the APF and saved Policies EC2, TR3, TR12, TR15 and TR16 from the 2006 adopted Thanet Local Plan.

9.190 The Airports NPS states at paragraph 5.5 that the Government's objective for surface access is to ensure that access to the airport by road, rail and public transport is high quality, efficient and reliable for passengers, freight operators and airport workers who use transport on a daily basis. The Government also wishes to see the number of journeys made to airports by sustainable modes of

transport maximised as much as possible and that this should be delivered in a way that minimises congestion and environmental impacts, for example on air quality.

- 9.191 Paragraph 5.9 advises that Applicants must prepare an airport surface access strategy in accordance with the guidance contained in the Aviation Policy Framework and that the airport surface access strategy must reflect the needs of the scheme contained in the application for development consent, including any phasing over its development, implementation and operational stages, reflecting the changing number of passengers, freight operators and airport workers attributable to the number of air traffic movements. The strategy should reference the role of surface transport in relation to air quality and carbon. The airport surface access strategy must contain specific targets for maximising the proportion of journeys made to the airport by public transport, cycling or walking. The strategy should also contain actions, policies and defined performance indicators for delivering against targets, and should include a mechanism whereby implementation of the strategy can be overseen and progress monitored against targets. Paragraph 5.10 requires that Applicants should consult Highways England, Network Rail and highway and transport authorities, as appropriate, on the assessment and proposed mitigation measures. The assessment should distinguish between the construction and operational project stages for the development comprised in the application.
- 9.192 In terms of mitigation, paragraph 5.15 states that Applicants should set out the mitigation measures that it considers are required to minimise and mitigate the effect of expansion on existing surface access arrangements. Paragraph 5.16 states that the Applicant should demonstrate in its assessment that the proposed surface access strategy will support the additional transport demands generated by airport expansion and that this should be appropriately secured. Paragraph 5.17 states that any application for development consent and accompanying airport surface access strategy must include details of how the applicant will increase the proportion of journeys made to the airport by public transport, cycling and walking.
- 9.193 Paragraph 5.18 states that the airport surface access strategy should consider measures and incentives which could help to manage demand by car users travelling to and from the airport, as well as physical infrastructure interventions, having at all times due regard to the effect of its strategy on the surrounding area and transport networks. These measures could be used to help achieve mode share targets and should be considered in conjunction with measures to mitigate air quality impacts as described in the Airports NPS.
- 9.194 In terms of decision making, paragraph 5.21 states that the Secretary of State will consider whether the Applicant has taken all reasonable steps to mitigate these impacts on the existing and surrounding transport infrastructure. Paragraph 5.22 states that provided the applicant is willing to commit to transport planning obligations to satisfactorily mitigate transport impacts identified in the transport assessment (including environment and social impacts) development consent should not be withheld on surface access grounds.
- 9.195 Chapter 14 of the ES [document reference TR020002/APP/5.2-2] provides the assessment of the traffic and transport related environmental effects of the Proposed Development. In accordance with paragraph 32 of the NPPF, a standalone Transport Assessment (TA) is also submitted with the DCO application [document reference TR020002/APP/5.2-15].
- 9.196 The Proposed Development site is well located to access key highway routes in the area which comprise: the A299 which links to the M2 and the A28 to Canterbury and the M20; and the A256

which links to Dover. Access to the A299 from the site is via the Manston Road (B2050) and the Spitfire Way (B2190) which are the roads which bound the site.

- 9.197 The TA has not included any calculations relating to the proposals for a new Thanet Parkway Rail Station close to the Proposed Development site as this is not yet a committed scheme. Any new station will clearly offer staff, visitors and passengers another sustainable choice about how they travel to the airport and is therefore supported but as demonstrated in the TA, it is not necessary to make the Proposed Development acceptable.
- 9.198 As shown in the illustrative Masterplan, the following access points are proposed. Detailed plans of the proposed accesses are provided in the TA. The accesses have been designed based on junction modelling to ensure that the design has capacity to accommodate the Proposed Development and future traffic flows:
- Cargo Facility – new access onto Spitfire Way in the form of a roundabout;
 - Passenger Terminal – existing access onto Manston Road will be upgraded to a signal junction;
 - 'Northern Grass' area – new southern access onto Manston Road in the form of a signal junction;
 - 'Northern Grass' area – new western access onto Manston Road in the form of a priority junction;
 - and
 - Fuel Farm – existing access onto Canterbury Road West will remain unchanged.
- 9.199 Other local highways improvements are proposed. Spitfire Way/Manston Road junctions will be upgraded to signalised crossroads. Both Spitfire Way and Manston Road will be widened to form a 7.3m carriageway, with 2m wide pedestrian footways provided on the southern side of Manston Road and eastern side of Spitfire Way between the Cargo Facility and Passenger Terminal junctions. Further details on the nature and design of these improvements are provided within the TA. There are nine off-site junctions that require mitigation by the year of full operation, the extent and timing of work will be agreed with Kent County Council as Highways Authority and procured via agreements under S278 of the Highways Act 1980.
- 9.200 Environmental measures have been incorporated into the Proposed Development to avoid, reduce or compensate for any adverse traffic and transport effects. These measures are summarised in Table 12.12 in Chapter 14 of the ES. The measures include :
- agreeing a Construction Traffic Management Plan with Kent County Council prior to commencing construction works to mitigate against any potential effects on severance, driver delay, pedestrian delay and amenity and accidents and safety as a consequence of the proposed construction works (a CTMP is provided with the DCO application and is included in the TA as Appendix K);
 - adopting a CEMP to control construction activities;
 - adopting an Airport Surface Access Strategy (ASAS) to maximise the multi-modal accessibility to the site including use of shuttle buses and improvements to local bus interchanges (a ASAS is submitted with the DCO application and is included in the TA as Appendix O) in accordance with paragraph 5.11 of the APF and paragraph 5.9 of the Airports NPS. The ASAS includes

targets for maximising the proportion of journeys made to the airport by public transport, cycling or walking. It also sets out a series of proposals for improving access for bus, coach and shared taxi the key features as follows:

- Provision of a shuttle bus from Ramsgate Station;
 - Provision for bus drop off near the entrance to the passenger terminal;
 - Proposal to enhance as appropriate local bus services to accommodate increase staff in the area;
 - Internal road network designed to accommodate bus movements as necessary; and
 - A moved and upgraded bus stop on Spitfire Way near the junction with Manston Road.
- adopting a Travel Plan to encourage sustainable travel by public transport (a Travel Plan is provided with the DCO application in the TA as Appendix L) in accordance with paragraph 36 of the NPPF;
 - adopting a Public Rights of Way Management Plan (PRoWMP) which sets out proposals to retain all pedestrian links and routes that exist currently and which may need to be diverted (a PRoWMP is submitted with the DCO application and is included in the TA as Appendix M). The PRoWMP will include measures to divert and widen Footpath TR8 (currently routes south from Manston Road along the existing airport boundary and then east towards High Street, Manston) and extinguish Footpath TR9 (currently routes from High Street, Manston towards the south and east before terminating within the existing airport boundary); and
 - adopting a Car Park Management Strategy. This is submitted with the DCO application and is included in the TA as Appendix N. It sets out the initial estimates of car parking across the proposed development site, including the passenger terminal, staff parking and parking for developments for the northern grass area and the cargo facility.

9.201 The potential effects on transport and traffic as a result of the Proposed Development that are assessed in the ES are as follows:

- Effects on highway capacity (passenger delay including public transport) and safety at junctions due to an increase in traffic flows due to operational/construction vehicles (assessed separately in the TA and CTMP);
- Effects on road user journey times due to the construction of access points and other onsite highways improvements relative to proposed road works and potential temporary road closures, diversions and/or widening (assessed in the CTMP);
- Effects on pedestrians and equestrians due to the closure and diversion of PRoWs (additional assessment in the PRoWMS); and
- Effects on vulnerable road users such as cyclists and equestrians on narrow country lanes due to increase in vehicle movements.

- 9.202 Inter-related effects with other environmental assessments have been considered. The following topics have assessed the impact of traffic and transport changes – air quality (Chapter 6); landscape and visual (Chapter 11); noise and vibration (Chapter 12); socio-economics (Chapter 13); health and wellbeing (Chapter 15); climate change (Chapter 16) and major accident and natural disasters (Chapter 17).
- 9.203 To undertake the assessment of effects of the traffic generated by the Proposed Development, the Proposed Development traffic flows need to be estimated and trips distributed onto the road network. Chapter 14 of the ES provides conclusions for the worst-case traffic flow scenario, which is for the operational traffic. Construction traffic has been screened out on the basis that the flows are less than fully operational.
- 9.204 In the worst-case future year (Year 20), when the proposed traffic generation is at its highest, only 7 of the 31 total receptors triggered the need for a detailed assessment. These locations were as follows;
- B2050 Manston Road between Shottendane Road and Vincent Road;
 - B2190 Spitfire Way between Spitfire Way and B2190 Columbus Avenue;
 - B2050 Manston Road between Manston Road and Manston Court Road;
 - Manston Court Road, south of the junction with Preston Road;
 - Manston Court Road, east of Valley Road; and
 - B2050 Manston Road, between the centre of Manston Village and the A256.
- 9.205 A detailed assessment of these receptors when considering severance, driver delay, pedestrian delay and amenity and accidents and safety has shown that the effects are not significant.
- 9.206 In addition to the assessment undertaken in the TA for the local road network, a link assessment of the wider Highways England network was undertaken which indicates impacts of less than 30% increase for total vehicles or HGVs on the Highways England network and as such is not considered significant and no mitigation is proposed.
- 9.207 With the environmental measures and mitigation proposed, not only will the traffic generated by the development fit broadly within the capacity of the local highways network, but they will improve the safety and transport options through the area by providing improvements to local pedestrian and sustainable links. The site will also become a hub for air travel, bringing significant jobs, visitors and economic benefits to the area.

Summary

- 9.208 The Proposed Development is not expected to give rise to any significant transport or traffic effects subject to implementing the mitigation that is proposed. In accordance with paragraph 5.5 of the Airports NPS, access to the airport by road, rail and public transport will be high quality, efficient and reliable for passengers, freight operators and airport workers who will use transport on a daily basis. The Applicant has taken all reasonable steps to mitigate any impacts on the existing and surrounding transport infrastructure and is committed to accepting transport planning obligations to satisfactorily

mitigate the transport impacts identified in the TA. On this basis, and in accordance with paragraph 5.22 of the Airports NPS, development consent should not be withheld on surface access grounds. The Proposed Development is therefore in accordance with the relevant planning policies and provisions governing traffic and transport.

m) Land Quality

- 9.209 Paragraphs 109, 120 and 121 of the NPPF are relevant as is paragraph 3.55 of the APF and saved Policy EC2 of the 2006 adopted Thanet Local Plan.
- 9.210 Paragraph 176 of the draft changes to the NPPF is also relevant but attracts less weight as it is the subject of ongoing consultation and could change.
- 9.211 The Airports NPS states at paragraph 4.54 that in deciding an application, the Secretary of State should focus on whether the development is an acceptable use of the land, and on the impacts of that use, rather than the control of processes, emissions or discharges themselves. The Secretary of State should assess the potential impacts of processes, emissions or discharges to inform decision making, but should work on the assumption that, in terms of the control and enforcement, the relevant pollution control regime will be properly applied and enforced. Decisions under the Planning Act 2008 should complement but not duplicate those taken under the relevant pollution control regime.
- 9.212 Chapter 10 of the ES [document reference TR020002/APP/5.2-1] provides the assessment of the Proposed Development on land quality and considers the potential for impacts on human health, controlled waters, ecology, property/structures, crops and animals.
- 9.213 Section 10.1 of Chapter 10 of the ES explains that no intrusive investigations have been undertaken to date and the assessment in the ES has therefore been based on a realistic worst-case scenario. It is considered unlikely that having the data that would be derived from such investigation would significantly change the findings of the assessment, however intrusive investigations will be carried out at a later date with the approach to undertaking these already under discussion with the EA, Southern Water and Thanet District Council.
- 9.214 The baseline position relating to land quality is as described in Chapter 8 of the ES as set out above. Made Ground is recorded in the centre of site but is likely to be present across the site associated with past development. Based on the available information, there are six historical landfills in the close surroundings of the site (within a 500m distance). In terms of ecological sensitivity, the site is located within a nitrate vulnerable zone and approximately 900m north-west of Sandwich Bay, Pegwell Bay and the Thanet coast which are classified as:
- National Nature Reserves (Sandwich and Pegwell Bay);
 - Ramsar Sites (Thanet Coast and Sandwich Bay);
 - Sites of Special Scientific Interest (Thanet Coast and Sandwich Bay); and
 - Special Areas of Conservation and Special Protection Areas (Thanet Coast and Sandwich Bay).
- 9.215 Environmental measures have been incorporated into both the construction and operational phases of the Proposed Development in order to avoid, reduce or compensate for potential adverse effects on land quality and these are set out in Section 10.5 of Chapter 10 of the ES. Many of the measures

reflect those described in Chapter 8 of the ES with regards to protecting the freshwater environment. They include the need for further site investigation to establish remediation needs in the event of contamination being found; adhering to a CEMP to address pollution measures and an Environmental Response Plan to reduce risks from spills or leaks; carrying out a detailed UXO threat and risk assessment and agreeing suitable foundation design and piling methods to prevent migration of any potential/residual contamination.

9.216 The potential for direct and inter-related effects include (Section 10.6 of Chapter 10 of the ES):

- Effects on Human Health, including during construction phase;
- Effects on Buildings and Services;
- Effects on Agricultural Soils;
- Effects on Coastal Waters;
- Effects on Groundwater in the Chalk aquifer; and
- Inter-related effects in relation to air quality from dust generation and vapour migration, and noise and vibration during site investigation and foundations works and freshwater environment effects from infiltration of contamination from existing sources and mobilisation of contamination during groundworks.

9.217 The assessment concludes that the potential effects are not significant, subject to appropriate mitigation being in place as set out in Table 10.15 of Chapter 10 of the ES.

Summary

9.218 Due to difficulties gaining site access, additional site investigation is required to better understand risks and any need for remediation. This will take place based on a methodology which will be agreed with the relevant organisations and bodies and initial discussions have already taken place. The Proposed Development will not contribute to, or be put at unacceptable risk from, soil pollution or through remediating and mitigating against contaminated land (paragraph 109 of the NPPF). The site is suitable for its new use taking into account the ground conditions and the proposals for mitigation including land remediation (paragraph 121 of the NPPF, paragraph 176 of the draft changes to the NPPF and paragraph 4.54 of the Airports NPS). The Proposed Development is consistent with the Government's stated policies on environmental protection (paragraph 3.55 of the APF) subject to appropriate mitigation as described and the relevant pollution control regimes. The Proposed Development is therefore in accordance with the relevant planning policies and provisions governing land quality.

n) Health and Wellbeing

9.219 Paragraphs 69 and 123 of the NPPF are relevant as are paragraphs 19, 3.12, 3.13, 3.34 and 3.47 of the APF and saved Policy EP5 from the 2006 adopted Thanet Local Plan.

- 9.220 Paragraphs 117 and 178 of the draft changes to the NPPF are also relevant but attract less weight as they are the subject of ongoing consultation and could change.
- 9.221 Paragraph 4.70 of the Airports NPS recognises that the construction and use of airports infrastructure has the potential to affect people's health, wellbeing and quality of life because of traffic, noise, vibration, air quality and emissions, light pollution, community severance, dust, odour, polluting water, hazardous waste and pests. However, the NPS especially highlights that the increased employment stemming from airport expansion may have indirect positive health impacts. There is recognition that these impacts may affect people simultaneously and so the cumulative impacts on health should be considered.
- 9.222 Chapter 15 of the ES [document reference TR020002/APP/5.2-2] provides the findings of a Health Impact Assessment (HIA) (provided as Appendix 15.1 of Chapter 15 of the ES – document reference TR020002/APP/5.2-13) that assesses whether the construction and operational activities associated with the Proposed Development are predicted to beneficially or adversely affect public health and wellbeing through environmental and socio-economic pathways. The assessment also considers, where possible, the spatial and social distribution of impacts, to investigate and address any disproportionate outcome for any sensitive community group. It also outlines measures to mitigate adverse effects and improvements to enhance beneficial effects. Although not explicitly referenced in the NPPF or required by the APF, HIA is often regarded as good practice for major developments; has been used to provide evidence concerning several other airports in the UK, and the approach fulfils the reinforced legislative requirement.
- 9.223 The HIA Community Profile provided at Appendix 15.2 of Chapter 15 of the ES and Health Evidence Base provided as Appendix 15.3 [both document reference TR020002/APP/5.2-13] detail the demographic and health baseline data used in the assessment. The community profile concentrates primarily on the districts of Thanet, Dover and Canterbury. Communities within Thanet district are mainly those with potential to be affected by local environmental impacts of the airport (which lies centrally within this district). The inclusion of Dover and Canterbury to form a wider study area is due to the likelihood of regional socio-economic impacts of employment and investment associated with the Proposed Development.
- 9.224 Following a review of the available demographic, health and hospital admission statistics, local communities in the study area typically have higher burdens of poor health than the national and regional trends (closely associated with socio-economic deprivation and lifestyle factors affecting health), particularly within Thanet. On this basis, the study area is considered particularly sensitive to environmental and socio-economic health pathways (beneficial or adverse). The assessment section therefore applies a conservative approach to each of the assessment protocols.
- 9.225 Environmental measures incorporated into the Proposed Development are discussed in Section 15.5 of Chapter 15 of the ES. This section draws on those measures summarised in other ES chapters that have the potential to affect health and wellbeing including Chapter 6 (Air Quality), Chapter 12 (Noise and Vibration) and Chapter 14 (Traffic and Transport). Section 7 (Health Action Plan) of the HIA at Appendix 15.1 of the ES draws together the relevant measures and discusses how these would mitigate potential pathways for adverse health impacts and enhance pathways for beneficial impacts. A summary of the embedded mitigation measures relating to health is presented in Table 15.3 of Chapter 15 of the ES. Such measures include adoption of a CEMP with measures to manage air pollutant emissions in the interests of mitigating adverse respiratory and cardiovascular health

impacts; highways and junction improvements and adoption of a Travel Plan to mitigate against traffic-related air pollutant and noise emissions, road safety, community severance and pedestrian or cyclist impacts; and creating a Community Trust Fund with regular annual payments made in addition to those collected from noise penalties to promote health and wellbeing among local communities and reduce existing burdens on local health services.

- 9.226 Section 15.7 of Chapter 15 of the ES (Table 15.4) sets out the predicted effects from the proposed development on health based on identified health and well-being pathways. A health and wellbeing pathway can be described as the way in which an activity influences a known determinant of health whether it be health protection (i.e. environmental pollution and standards set to protect health); health promotion (i.e. healthy lifestyles, socio-economic status and inequalities); or health care (i.e. provision, effectiveness and equity of access to healthcare services). The potential effects that are assessed in the ES are as follows:
- Construction noise and vibration;
 - Construction dust and air pollutant emissions;
 - Construction traffic generation;
 - Construction workforce and procurement;
 - Airport / aircraft noise;
 - Airport / aircraft air pollutant emissions;
 - Surface access road traffic generation; and
 - Economic activity and employment.
- 9.227 The Proposed Development is predicted to generate up to 3,417 direct job opportunities and further 6,151 indirect and 13,668 induced job opportunities. Being in stable, good-quality employment is strongly associated with good health and wellbeing compared to being in long-term unemployment. As a result, the employment generated by the Proposed Development has the potential to offer important long-term health and wellbeing benefits especially given the higher than average levels of unemployment particularly in Thanet. The Proposed Development will deliver moderate beneficial effects.
- 9.228 Given the future baseline labour market surplus predicted, the employment generated by the Proposed Development is not expected to lead to additional in-migration, housing or consequent additional demand on other local public services.
- 9.229 Leisure travel and social connections enabled by air travel have been reported to be associated with quality of life factors, and while the Proposed Development will primarily be used as an air freight hub, there may be limited passenger services, potentially offering quality of life and wellbeing benefits affecting a large number of leisure travellers.
- 9.230 The Travel Plan and Surface Access Strategy set out proposed vehicle routing and highways improvements to manage traffic to and from the airport without causing detriment to road safety or severance for pedestrians. Enhancements to bus services (including a shuttle from Ramsgate

railway station) are proposed, and measures to encourage and provide connections for commuting by cycling have been recommended. With these measures, no significant adverse health and wellbeing effects due to changes in road traffic flows are predicted and there is potential for benefits due to physical activity and healthy transport for employees.

- 9.231 Changes in air pollutant concentrations due to the Proposed Development are predicted to have in the worst case a small but measurable adverse effect on health outcomes, with an increase of around one additional emergency hospital admission and effect on mortality equivalent to a little less than two additional deaths at typical ages predicted per annum. However, in the context of the baseline rates in the air quality study area, these changes would represent a very small proportion: 0.1% or less. This is considered to be a minor adverse effect on health. The air quality assessment predicts no exceedances of air quality standards in Year 2 and Year 20 with or without the Proposed Development at any sensitive receptor locations.
- 9.232 Change in noise exposure due to the Proposed Development is addressed with Chapter 12 of the ES (Noise and Vibration).
- 9.233 Construction-stage noise would be temporary (with phased works) and subject to control through the Construction Environmental Management Plan. No significant adverse impacts on health due to any temporary noise disturbance during construction are predicted.
- 9.234 Change in noise exposure due to the Proposed Development is predicted to lead to up to around 329 additional cases of hypertension prevalent within the population at Year 20 noise levels, which may be associated with up to four additional cases of heart disease, two cases of stroke and two cases of dementia per annum. An increase in depression or anxiety associated with high annoyance of up to 219 cases prevalent within the population is also possible. No significant impact on sleep disturbance is predicted due to the small number of night flights forecast.
- 9.235 Depending on existing baseline environmental noise levels, there is potential for adverse impacts on children's learning in schools affected by noise but this is expected to be mitigated where necessary through the provision of sound insulation in line with measures described in the Noise Mitigation Plan. No significant effects due to change in noise at healthcare facilities are predicted.
- 9.236 Overall, the magnitude of impact on health and wellbeing due to noise is considered to result in a moderate adverse effect prior to mitigation. Measurable adverse changes in health outcomes are predicted, representing increases of between around 1% and 6% of baseline rates, depending on the health outcome being considered.
- 9.237 A range of embedded mitigation measures designed to address the potential for adverse impacts has been developed. These comprise measures to appropriately route road traffic and improve highways used for access and measures to mitigate air pollutant emissions. The Noise Mitigation Plan provides a range of measures to both control noise at source and to mitigate it at receptors with sound insulation grants, which by reducing noise levels in homes would be expected to lead to a proportional reduction in adverse health and wellbeing outcomes for residents.
- 9.238 No significant adverse health and wellbeing effects through the pathways of flood risk, ground or water contamination, or change to amenity or access to green space are predicted.

In addition to mitigation, enhancement measures have been developed to maximise the uptake of job opportunities among people in long-term unemployment, provide education and training, and for Manston Airport to be a good quality employer, which would support the achievement of the significant beneficial effects on health predicted through the employment and socio-economic impacts of the airport (see Chapter 13 of the ES). Measures to support active travel (i.e. walking and cycling) and the Community Trust Fund (with financial contribution to local projects and activities that benefit health and wellbeing among its terms of reference) are proposed.

Summary

- 9.239 The Proposed Development is expected to deliver significant beneficial health and wellbeing effects through job creation; no demands on in-migration, housing or consequential demands on local public services; connectivity and enhancements to proposed vehicle routing, highway, bus services and walking and cycling.
- 9.240 The proposed mitigation and enhancement measures respond to the two health and wellbeing pathways - change to noise and air pollution - where potential for significant adverse effects have been identified, albeit that that no air quality limit values will be breached as indicated in the separate air quality assessment (Chapter 6 of the ES). They also provide important enhancements to the significant beneficial health and wellbeing effects through the socio-economic pathway, workplace health and wellbeing, and active transport, in line with local health objectives and priorities.
- 9.241 Both the air quality and noise assessments have adopted a robust 'worst case scenario' approach in that no allowances have been made for quieter and less polluting aircraft which are expected in the future as improvements are made within the industry. It is reasonable to expect that by Year 20 of operation that such improvements will lead to a reduction in the magnitude of the adverse effects predicted.
- 9.242 If considering the cumulative effects on health as recommended in paragraph 4.73 of the Airports NPS, it is clear that the significant beneficial effects of the Proposed Development outweigh the adverse effects. In this respect, and in acknowledgement of the proposed mitigation and enhancement measures to tackle changes in air pollution and noise exposure and the 'worst case scenario' approach to noise and air quality assessment that has been adopted in the ES, the Proposed Development is in accordance with the relevant planning policies and provisions governing health and wellbeing.

o) Major Accidents and Natural Disasters and Security

- 9.243 As a result of the introduction of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations 2017) it is now a requirement that major accidents and disasters relevant to a development are included in the preparation of an Environmental Statement. The EIA Regulations 2017 require the expected significant effects arising from the vulnerability of the proposed development to major accidents or disasters that are relevant to that development to be assessed (Regulation 5(4)).
- 9.244 Paragraph 5.14 of the APF states that safety is a fundamental requirement for aviation, including at the local level. For people living and working near airports, safety is best assured by ensuring the safe operation of aircraft in flight.

- 9.245 The Airports NPS (paragraphs 4.63 to 4.69) considers security considerations and states that Government policy is to ensure that, where possible, proportionate protective security measures are designed into new infrastructure projects at an early stage in the project development (paragraph 4.64). The nature of the aviation sector as a target for terrorism means that security considerations will likely apply. Adequate consideration needs to be given to the management of security risks (paragraph 4.65).
- 9.246 Paragraph 96 of the draft changes to the NPPF states that planning decisions should promote public safety and take into account wider security and defence requirements by anticipating and addressing all plausible malicious threats and natural hazards, especially in locations where large numbers of people are expected to congregate. It further states that the layout and design of developments should be informed by the most up-to-date information available from the police and other agencies about the nature of potential threats and their implications. This includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security.
- 9.247 Chapter 17 of the ES [document reference TR020002/APP/5.2-3] provides the assessment of major accidents and disasters, on and as a result of, the Proposed Development. In accordance with Schedule 4 of the 2017 EIA Regulations, Chapter 17 of the ES includes a “*description of the expected significant adverse effects of the development on the environment deriving from the vulnerability of the development to risks of major accidents and/or disasters which are relevant to the project [...]* and where appropriate, this description includes measures envisaged to prevent or mitigate the significant adverse effects of such events on the environment and details of the preparedness for and proposed response to such emergencies.” The ES Chapter considers major accidents, disaster, serious damage on human populations and serious damage on the environment (Section 7.1 of Chapter 17 of the ES includes definitions). It draws upon data presented in other ES chapters as set out in Section 17.3 of Chapter 17.
- 9.248 A list of typical sources of major accident and disasters hazards which can be associated with airport and fuel storage operations and which has formed the basis for the assessment can be summarised as follows:
- Construction phase major hazards – man-made accident hazards resulting from construction activities and equipment ;
 - Operational phase major hazards – man-made accident hazards resulting from operations, activities and equipment at an airport;
 - External major hazards – man-made accidents resulting from operations, activities and equipment external to an airport development. These are relevant to both operation and construction phases of an airport, unless otherwise indicated; and
 - Disaster hazards– natural disasters resulting from the occurrence of natural adverse conditions or events. These are relevant to both operation and construction phases of an airport, unless otherwise indicated.
- 9.249 Environmental measures have been incorporated into both the construction and operational phases of the Proposed Development in order to avoid, reduce or compensate for potential adverse effects

from major accidents and disasters. These are set out in Tables 17.6 and 17.7 in Chapter 17 of the ES. Some of the measures have been included in the design specifically for major accidents and disasters risk management purposes. Others, while beneficial in reducing the impact of major accident and disaster risk, were developed primarily to reduce impacts considered in other chapters. Following the grant of the DCO and as the design advances through engineering design stages, risk assessments will be undertaken to account for all emerging and relevant engineering details in the evolving design scheme. Prior to operation, Safety Management and Environmental Management Systems, with associated procedures and an Emergency Plan, will be developed and implemented. A Security Plan will also be adopted.

9.250 The potential for effects include:

- Effects on Groundwater/SPZ;
- Effects on Pegwell Bay and associated designated sites;
- Mitigation of flood risk and adverse weather;
- Effects on designated heritage assets including historic buildings, scheduled monuments and conservation areas;
- Effects on populations or occupied buildings off-site and on-site;
- Effects on other designated land (other than Pegwell Bay);
- Effects on widespread habitat, non-designated land/soil/water; and
- Effects on particular species onsite and offsite.

9.251 Intrusive construction activities have the potential to cause disturbance to the ground at the site. During construction there is also the potential for substances to enter the groundwater and pollute the groundwater source protection zone through fuel and hazardous chemical releases, ordnance and civils being revealed and firewater run off entering the groundwater. Implementing a combination of incorporated mitigations such as a Construction Environmental Management Plan, strategies for interface with the operational airport systems appropriate handling and minimisation of hazardous chemicals, pre-construction inspections, interface with the operational airport systems, and adoption of risk management and inherent safe design principles will result in no significant effects to the groundwater receptors during construction.

9.252 During construction there is also the potential for fuel and chemical releases on site to enter the drainage network and be released to Pegwell Bay, which is an internationally and nationally recognised site. Extreme adverse weather conditions (e.g. hurricanes) and external events (e.g. fires) were also considered as a cause of material being released to the bay. It was concluded that adoption of the Construction Environmental Management Plan and implementation of the incorporated measures for construction, including drainage strategies (developed in consultation with the EA), measures for minimisation, storage and containment of hazardous materials, together with adoption of risk management and inherent safe design principles into the construction plan, will result in no significant effects during construction.

- 9.253 There is the potential for populations involved in construction, or those who are nearby, to be affected by an activity (e.g. by collision) of release of a hazardous material used in construction. A combination of measures such as risk assessments and safety management plans and interface with the airport safety and environmental management systems, in addition to good practice, for example, will result in no significant effects.
- 9.254 For all of the construction activities, a comprehensive Emergency Plan, addressing major accidents and disasters will be developed. Airport operations will involve the use, storage (e.g. the fuel farm and use of other operational chemicals) and handling of hazardous chemical or fuels. There is the potential for these to be accidentally released via the drainage network to Pegwell Bay or enter the source protection zone via the ground, in the unlikely event of a large spillage. Key mitigation measures include the capture and treatment of drainage on site, implementation of an airport-wide Environmental Management System, and operational licensing requirements under EASA and EASA/CAA guidance. Specific consideration is included in the design process to ensure all hazardous material is contained and risk is minimised.
- 9.255 The combination of these results in no significant effects to the surface water and groundwater receptors during operation.
- 9.256 During operation there are aircraft flights, associated vehicle movements, mobile and fixed equipment and the use and storage of chemicals and fuels for operational purposes. There is a remote possibility for injury or loss of life to airport workers, aircraft users/crew and others nearby (surrounding towns/villages) without the correct measures in place. A combination of measures including operational certification requirements under EASA (including aerodrome security), consideration during design and detailed risk assessments in addition to good practice, conformance with the relevant EASA licensing, the Health and Safety at Work Act, EASA/CAA guidance and industry standard codes and practice will mean that there will be no significant effects to populations during operation.
- 9.257 There are no designated land sites within close proximity of the proposed development, though some exist within the flight swathe. There is a remote possibility these could be affected by aircraft incidents. Good practice, airport safety and environmental management and conformance with relevant guidance and licensing will result in no significant effects to the receptors. There are no world heritage sites within the study areas although there are scheduled monuments within the indicative flight swathe which could be affected by aircraft incidents. For the same reasons as designated land, there will be no significant effects to the receptors.

Summary

- 9.258 The assessment reveals no significant effects. The ES includes an adequate consideration of the management of security risks and protective security measures are proposed (Airports NPS). In line with the draft changes to the NPPF, the Proposed Development will promote public safety and take into account wider security requirements. The ES chapter assesses a number of plausible threats and natural hazards and proposes appropriate steps that will be taken to reduce vulnerability, increase resilience and ensure public safety and security. The Proposed Development is therefore in accordance with the relevant planning policies and provisions concerning major accidents, disasters and public safety.

p) Resource and Waste Management

- 9.259 Paragraph 9 of the NPPF states that the planning system has a role to play in minimising waste. However, the framework does not contain any specific waste policies since waste planning policy is set out in the National Waste Plan for England (2013). This document sets out the Government's ambition to work towards a more sustainable and efficient approach to resource use and management. The National Planning Policy for Waste (2014) sets out detailed waste planning policies and should be considered in conjunction with the NPPF, the Waste Management Plan for England and National Policy Statements for Waste Water and Hazardous Waste, or any successor documents. These are relevant policies as is paragraph 3.53 of the APF.
- 9.260 Paragraph 5.135 of the Airports NPS states that the Government policy on hazardous and non-hazardous waste is intended to protect human health and the environment by producing less waste and by using it as a resource wherever possible. Where this is not possible, waste management regulation ensures that waste is disposed of in a way that is least damaging to the environment and to human health. Paragraph 5.136 states that sustainable waste management is implemented through the waste hierarchy - Waste prevention; Preparing for reuse; Recycling; Other recovery, including energy recovery; and Disposal.
- 9.261 Paragraph 5.141 requires the Applicant to set out the arrangements that are proposed for managing any waste produced in the application for development consent. The arrangements described should include information on the proposed waste recovery and disposal system for all waste generated by the development. The applicant should seek to minimise the volume of waste sent for disposal unless it can be demonstrated that the alternative is the best overall environmental, social and economic outcome when considered over the whole lifetime of the project.
- 9.262 In terms of mitigation, the Airport NPS states that the Applicant should set out a comprehensive suite of mitigations to eliminate or significantly reduce the risk of adverse impacts associated with resource and waste management (paragraph 5.143).
- 9.263 In terms of decision making, paragraph 5.145 states that the Secretary of State will consider the extent to which the applicant has proposed an effective process that will be followed to ensure effective management of hazardous and non-hazardous waste arising from all stages of the lifetime of the development. The Secretary of State should be satisfied that the process set out provides assurance that:
- Waste produced will be properly managed, both onsite and offsite;
 - The waste from the proposed development can be dealt with appropriately by the waste infrastructure which is, or is likely to be, available. Such waste arising should not have an adverse effect on the capacity of existing waste management facilities to deal with other waste arising in the area; and
 - Adequate steps have been taken to minimise the volume of waste arising, and of the volume of waste arising sent to disposal, except where an alternative is the most sustainable outcome overall.

- 9.264 Paragraph 5.146 states that where necessary, the Secretary of State will require the applicant to develop a resource management plan to ensure that appropriate measures for sustainable resource and waste management are secured.
- 9.265 Section 3.3 of Chapter 3 of the ES [document reference TR020002/APP/5.2-1] provides details of the best waste practice measures that will be employed during the construction and operation phases of the Proposed Development. These measures will be used to inform implementation of a robust CEMP and Site Waste Management Plan (SWMP). The SWMP will require input from the detailed design stages that will follow any grant of a DCO and the associated waste streams.
- 9.266 Construction waste material will be generated at all stages of the construction process including through demolition of existing buildings, excavation and earthworks and construction of new buildings. Indicative targets for the construction of the Proposed Development are to achieve an 87% diversion of waste from landfill, and 62% re-use of materials within the site. Operational waste targets are dependent on the exact nature of the airport activities and in the airport related business development on the 'Northern Grass' site.
- 9.267 A number of measures will be employed to minimise construction waste material as follows:
- Earthworks construction waste could be minimised by balancing the cut and fill operations for the new aircraft cargo stands and warehousing plus utilising any low areas on the grassed area including the 'Northern Grass' area. At this stage, there is insufficient information to determine the existing earthwork materials' suitability as an engineering fill material underneath the aircraft pavements;
 - Demolition arisings, where possible, will be recycled for use on site. This includes the material from the existing taxiways and apron stands that will be removed;
 - Wrapping and packing will be returned to the supplier; and
 - Following good practice segregation of waste during the construction phase of the development including for recycling, food waste, residual waste and hazardous waste.
- 9.268 In terms of operational waste and measures to minimise this, this will depend on the final design for the development and future airport functions. Following any grant of the DCO, RiverOak will develop a framework Waste Management Plan for the site in consultation with the EA which will be based on the following hierarchy:
- Minimise raw materials consumed and the volume of waste produced i.e. prevent creating waste;
 - Re-use any waste produced, where practicable;
 - Recycle waste, where reuse is not practicable;
 - Recover waste, where feasible; and
 - Dispose of any remaining waste streams in accordance with legislative requirements.

- 9.269 The provision of effective storage and segregation of waste materials at the site will be a key element to ensure waste is managed safely and efficiently to maximise the potential for reuse and recycling.

Summary

- 9.270 RiverOak are proposing a number of measures to ensure that waste will be minimised during both the construction and operation phases of the Proposed Development in line with the NPPF; the National Waste Plan for England (2013) and National Planning Policy for Waste (2014) – and the waste hierarchy contained within this document and the Airports NPS. Measures are also proposed to ensure that waste is disposed of in a way that is least damaging to the environment and to human health (paragraph 5.135 of the Airports NPS). Mitigation is further proposed to eliminate or significantly reduce the risk of adverse impacts associated with resource and waste management including from hazardous waste (paragraph 5.143 of the Airports NPS). RiverOak will develop and implement a Site Waste Management Plan to ensure that appropriate measures for sustainable resource and waste management are secured (paragraph 5.146 of the Airports NPS). The Proposed Development is therefore in accordance with the relevant planning policies and provisions concerning major accidents, disasters and public safety. The Proposed Development is therefore in accordance with the relevant planning policies and provisions concerning waste and resource management.

q) Common Law Nuisance and Statutory Nuisance

- 9.271 Paragraph 4.61 of the Airports NPS states that during the examination of an application for development consent for infrastructure covered under the Airports NPS, possible sources of nuisance under section 79(1) of the Environmental Protection Act 1990 and under Sections 76 and 77 of the Civil Aviation Act 1982 should be considered by the Examining Authority. The Examining Authority should also consider how those sources of nuisance might be mitigated or limited so they can recommend appropriate requirements that the Secretary of State might include in any subsequent order granting development consent.
- 9.272 Volume 14 of the ES [document reference TR020002/APP/5.2-14] is the Statement of Statutory Nuisance. This statement considers both the construction and operational phases associated with the Proposed Development.
- 9.273 The statement concludes that with mitigation in place, none of the statutory nuisances identified in Section 79(1) of the Act is predicted to arise.

r) Community Compensation

- 9.274 Paragraph 5.239 of the Airports NPS states that the Secretary of State recognises that, in addition to providing economic growth and employment opportunities, airport expansion will also have negative impacts upon local communities, for example, impacts through exposure to air quality impacts and aircraft noise. Paragraph 5.240 states that Secretary of State expects the applicant to provide an appropriate community compensation package, relevant to planning. This will include financial compensation to residents who will see their homes compulsorily acquired, as well as ongoing financial compensation to the local community. In addition to controlling and reducing aircraft noise impacts, the applicant will be required to commit appropriate resources to mitigate the impacts

of aircraft through noise insulation programmes for both private homes and public buildings such as schools.

- 9.275 Paragraph 5.251 states that the Secretary of State will consider whether and to what extent the applicant has sought to minimise impacts on local people and paragraph 5.253 states that the Secretary of State will expect the applicant to demonstrate how the compensation provisions are to be secured, and how they will be operated. The applicant will also need to show how these measures will be administered to ensure that they are relevant to planning when in operation. The mechanisms for enforcing these provisions should also be demonstrated.
- 9.276 RiverOak has always been aware that the issue of noise created by the operation of the airport would be one of the issues of principal concern for residents in the Districts of Thanet and Canterbury as highlighted in the statutory and non-statutory pre-application consultation events. RiverOak understands those concerns and is offering a range of commitments on future noise related activities at the airport in the form of a Noise Mitigation Plan [document reference TR020002/APP/2.4]. The commitments are designed to provide clarity to residents and reduce their concerns. Those potentially affected by noise were given a chance to comment upon the provisions of the Noise Mitigation Plan during the statutory consultation period before it was finalised and included in RiverOak's DCO application. The Noise Mitigation Plan was amended in response to the consultee comments in the pre-application process.
- 9.277 The Noise Mitigation Plan has been presented mindful of the noise mitigation measures that were voluntarily offered by Kent International Airport back in 2000 (see Section 2 of this statement). On the whole, the package of measures being proposed in this DCO application is equal to or better than measures previously offered. The terms of the Noise Mitigation Plan allow for maximum flexibility in terms of future airport operations at this stage whilst fully recognising obligations to minimise adverse noise effects, in advance of any certainty over the proposed changes to airspace. The fourteen measures included in the proposed Noise Mitigation Plan are considered to relevant in planning terms, and appropriate in light of the assessment of noise effects.
- 9.278 The measures included in the Noise Mitigation Plan are summarised below – full details are provided in document reference TR020002/APP/2.4:
- **Aircraft Quota Count Restrictions** – the use of 'quota counts' is common at other UK airports, where aircraft are given an independently assessed score known as a 'quota count' according to how noisy they are, and then a quota is imposed. Thus there will be a control of the total amount of noise from aircraft rather than the total number of aircraft. The noisiest aircraft (with quota count 8 or 16) are also banned from night flying altogether. The airport will be subject to an annual quota during the Night Time Period (2300 to 0700) of 3028. Emergency flights and flights operated by relief organisations will not count towards the night time quota count. The night time period quota figure has been arrived at based on a typical mix of aircraft operating within the noise levels that have been environmentally assessed, rather than taking the noisiest possible aircraft.
 - **Noise Insulation Scheme (Residential Properties)** – 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. Residential properties

with habitable rooms within the 63dB LAeq (16 hour) day time contour will be eligible for the payment. Residential properties which are not eligible but which have bedrooms which fall within the 55dB LAeq (8 hour) contour will be eligible for the payment.

- **Noise Insulation Scheme (Noise Sensitive Properties)** - 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.
- **Relocation** – a relocation assistance scheme will be offered by the airport authority to enable those homeowners exposed to the highest levels of airport related noise to move away from the airport. A successful applicant to the relocation assistance scheme will receive £5,000 plus 1.5% of the sale price of the property up to a maximum of £12,500. Owners of residential properties within the 69 dB LAeq (16 hour) contour will be eligible for the payment subject to criteria.
- **Training flights** - other than general aviation training that is based at Manston Airport, there will be no routine training flights.
- **Engine testing** – there will be no open field testing of jet engines during the night time period (2300 to 0700) except where operationally urgent and carried out within a designated test area.
- **Reverse thrust** - the airport will establish a policy which minimises the use of reverse thrust except where operationally essential.
- **Aircraft approach** - aircraft operators will be encouraged to keep noise disturbance to a minimum by operating a low power/low drag procedure subject to air traffic control speed control requirements and the maintenance of safe operation of the aircraft.
- **Runway Operation** - when weather conditions allow, and taking into account other operational and safety considerations including runway utilisation, the airport authority will seek to operate take-offs from Runway 28 and landings on Runway 10 subject to such operations being in accordance with CAA guidance and the aircraft operator's own limitations and safety management systems.
- **Wake turbulence** - the airport operator will implement the Wake Turbulence Policy (see Appendix 2 attached to document reference TR020002/APP/2.4).
- **Aircraft noise monitoring** - permanent fixed noise monitoring terminals will be located under each of the aircraft departure flight paths at a distance of 6.5km from the start of take-off roll.
 - During the Day Time Period (0700 to 2300) the operator of any departing aircraft that exceeds 90 dB LASmax at the relevant noise monitoring terminal will be subject to a penalty of £750 and a further penalty of £150 for each additional decibel exceeded above 90 dB LASmax.
 - During the Night Time Period (2300 to 0700) the operator of any departing aircraft that exceeds 82 dB LASmax at the relevant noise monitoring terminal will be subject to a penalty of £750 and further penalties of £150 for each additional decibel exceeded above 82 dB LASmax.

- **Off-track Flight** - the airport operator will install a Noise and Track Keeping System which will track aircraft in flight. Through the Airspace Change Process the airport authority will seek to establish Noise Preferential Routes (NPR) which will be designed to avoid overflying of densely populated areas. The airport will require each aircraft operator to ensure that 95% of all departures within a calendar year remain within the NPR. Any aircraft operator which fails to meet the target and subsequently fails to work collaboratively with the airport after being notified of persistent departures outside of the NPRs will be subject to a track keeping penalty of £500 per aircraft departure.
- **Community Consultative Committee** - the airport operator will establish a Community Consultative Committee in accordance with section 35 of the Act and with the guidance contained in “Guidelines for Airport Consultative Committees” (Department for Transport, 17 April 2014).
- **Community Trust Fund** - the airport operator will establish a Community Trust Fund into which all penalties referred to above will be paid. The proceeds of the fund will be applied to community projects within the 50 dB LAeq (16 hour) day time contour and 40 dB LAeq (8 hour) contours by the Community Consultative Committee. The airport operator will contribute £50,000 per annum to the Community Trust Fund.

s) Cumulative Effects

- 9.279 Paragraph 4.4 of the Airports NPS makes clear that in considering any proposed development, and in particular when weighing its adverse impacts against its benefits, the Examining Authority and the Secretary of State will take into account:
- Its potential benefits, including the facilitation of economic development (including job creation) and environmental improvement, and any long term or wider benefits; and
 - Its potential adverse impacts (including any longer term and cumulative adverse impacts) as well as any measures to avoid, reduce or compensate for any adverse impacts.
- 9.280 Chapter 18 of the ES [document reference TR020002/APP/5.2-3] is the Cumulative Effects Assessment. The approach that has been taken is to distinguish between combined (or inter-related) effects, and cumulative effects. This approach is consistent with the advice contained within PINS Advice Note 9 (2012, Rochdale Envelope – Version 2), PINS Advice Note 17 (2015, Cumulative Effects Assessment – Version 1) and the 2017 EIA regulations.
- 9.281 Typically, combined effects occur when different activities associated with a project act upon the same environmental receptor. In determining such effects, consideration would be given to the sensitivity of the receptor and the magnitude of environmental change. Interactive effects are assessed in relation to a specific receptor, but here the effect could be caused by the interactions of different types of effect from project activities even if individually these are insignificant. Human health effects are excluded from the inter-related effects assessment. The potential for human health effects as a result of changes related to multiple topics such as noise, air quality and socio-economic are detailed in Chapter 15 of the ES (Health and Wellbeing). Chapter 18 also assesses the potential for cumulative effects associated with other development - i.e. whether any other developments

would contribute to creating, with the proposed development, a cumulative effect that would be greater than would occur if the Manston Airport project was being developed in isolation.

9.282 Table 18.7 in Chapter 18 of the ES summarises the significant inter-related effects as follows:

- Residential properties in close proximity to the airport runway (at Alland Grange Lane; the southern end of High Street, Manston; Pounces Cottages; the northern end of Cliffsend and on Canterbury Road West, south of Jentex site), have the potential to experience significant inter-related noise and visual effects during the daytime. However if the noise insulation scheme is taken up, inter-related effects are less likely. In this instance, potentially significant inter-related effects would likely be experienced by residents within gardens at the northern end of Cliffs End only. However up to eight properties at the northern end of Cliffs End also will experience significant indoor inter-related effects but will be eligible for financial assistance for relocation as part of the Noise Mitigation Plan.
- Significant inter-related effects are also anticipated for visitors to the Spitfire and Hurricane Memorial Museum and RAF Manston History Museum in relation to visitor arrival and departure and any outdoor exhibits during the operational phase of the Proposed Development.
- The community of Manston, particularly in the area of Preston Road, Manston; in northern section of High Street, Manston; in southern section of High Street; Manston; Jubilee Cottages on Manston Road; PRoWs TR8, TR9, TR10 and TR22; Manston Court Caravan Site and Preston Parks are likely to experience significant daytime inter-related noise and visual effects in relation to visitor arrival and departure and any outdoor exhibits during the operational phase of the Proposed Development.
- The community of Manston may also experience significant inter-related noise and visual effects during the daytime, in both shared open spaces and indoor spaces (specifically residential properties at Preston Road, Manston; in northern section of High Street, Manston; in southern section of High Street; Manston; Jubilee Cottages on Manston Road; PRoWs TR8, TR9, TR10 and TR22; and Manston Court Caravan Site and Preston Parks). Effects on some indoor spaces are less likely to be significant if eligible residents take up the noise insulation scheme, however this scheme will not apply to caravan sites.

9.283 Table 18.8 in Chapter 18 of the ES summarises the significant cumulative effects. No significant inter-project cumulative effects are likely with regards to air quality, biodiversity, freshwater environment, historic environment, land quality, landscape, noise (construction period only), socio-economics, traffic and transport, health and wellbeing, climate change and major accidents and disasters.

9.284 A significant adverse cumulative visual effect could be experienced at properties on Haine Road; PRoW TR24 and PRoWs close to Flete and Lydden within PRoW Group C as a result of the introduction of three substantial developments – the Proposed Development; the 62 unit residential scheme at Canterbury Road and the 550 unit mixed-use scheme at the Eurokent site. The contribution of the Proposed Development to the magnitude of visual change experienced by these receptors would be low, but the combined magnitude of change would be likely to increase to

medium. It is possible that significant cumulative effects could be avoided if mitigation measures (in terms of the provision of landscape screening) were incorporated as part of the Canterbury Road and Eurokent schemes.

- 9.285 A significant adverse annoyance and disturbance effect as a result of aircraft noise during the day and annoyance, disturbance and sleep disturbance from night time aircraft noise is also expected at residential properties at the Manston Green development site and at a Development Plan allocation at the north-western edge of Cliffsend. Significantly affected dwellings will be eligible for sound insulation which, if accepted by the property owners, will reduce noise inside dwellings during the daytime and night time such that it does not reach a level where it will significantly affect residents

Summary

- 9.286 The Proposed Development will bring significant social, environmental and economic benefits including job creation and economic prosperity in addition to the significant benefit that it will deliver in terms of meeting Government aviation policy objectives. Its potential cumulative adverse impacts are not substantial due mainly to the proposed mitigation and enhancements offered. The potential residual adverse effects are not outweighed by the significant benefits that the Proposed Development would deliver.

10 THE ACCEPTABILITY OF THE PROPOSED DEVELOPMENT : CONCLUSIONS

- 10.1 This Planning Statement has been prepared to accompany a Development Consent Order application by RiverOak Strategic Partners Limited to reopen Manston Airport in Kent as a modern, freight-focussed airport with some passenger services. The proposals include both the use of the existing airport infrastructure and the introduction of new facilities.
- 10.2 The Development Consent Order application includes compulsory acquisition powers. In addition to obtaining approval for development consent, approval will also be required for the new airspace and operating procedures from the Civil Aviation Authority (CAA).
- 10.3 Air freight and cargo operations are planned to resume at the airport in Year 2 (expected to be in 2021) with passenger services expected to follow in Year 3 (expected to be in 2022).

The Process

- 10.4 The determination of this DCO application will be made in the absence of a directly applicable Airports NPS (Section 104(2) of the Planning Act 2008) in accordance with Section 105 of the Planning Act 2008. A decision on the application can be taken on this basis. The primary policy basis for determining the DCO application is the Government's National Policy on Aviation as contained within the Aviation Policy Framework (March 2013). However, and since publication of the APF, significant progress has been made by the Government on addressing matters relating specifically to airport expansion in the South East especially through the work of the Airports Commission. Consequently, the APF is considered to be out-of-date in relation to this particular matter and due consideration needs to be made to the Airports NPS which is important and relevant and the Government's July 2017 consultation on the new Aviation Strategy White Paper.
- 10.5 The Planning Act 2008 does not incorporate Section 38(6) of the Planning and Compulsory Purchase Act 2004 which provides the principal basis in law for the determination of planning applications namely that they must be determined in accordance with the Development Plan unless material considerations indicate to the contrary. The local Development Plan therefore is not the starting point for the consideration of a DCO. Nevertheless, the strong policy support for the Proposed Development in the adopted Thanet Local Plan is likely to be both important and relevant.

The Strong Need Case

- 10.6 Government policy on aviation makes it clear that it is not appropriate to re-examine the need for increased aviation capacity or, indeed, to question the Government's clear policy position that increases in aviation capacity are necessary and that they bring significant benefits. Government aviation policy is also clear that air freight in particular is important to the UK. The importance of aviation to the UK economy, and in particular the UK's hub status, has only increased following the country's decision to leave the European Union. As the UK develops its new trading relationships with the rest of the world, it will be essential that increased airport capacity is delivered, in particular to support development of long haul routes to and from the UK, especially to emerging and developing economies.

- 10.7 There is strong support for the Proposed Development in the Government's policy on aviation and especially in light of the challenges that already exist in the UK's aviation sector particularly in London and the South East. The Government recognises that not increasing airport capacity in the South East would be detrimental to the UK economy, to international and domestic connectivity, to aviation resilience planning, fares and knock-on effects in lost trade, tourism and direct foreign investment. The Proposed Development not only offers a genuine, realistic, focussed and immediate response to addressing a longstanding need for increased aviation capacity but it will help to recapture cargo traffic which is being displaced to mainland Europe by providing a reliever function for the main London airports. Without new airport infrastructure of the type being proposed, the objectives of the Government's aviation policy cannot be fulfilled.
- 10.8 The established use for the site is for airport uses. Key airport related infrastructure already exists and the runway in particular is in very good condition. The airport site continues to be protected for airport uses in the adopted Thanet Local Plan and these policies have been confirmed recently by a Planning Inspector to carry significant weight in the overall planning balance. RiverOak's research concludes that there is no other airport or airfield in the South East that could realistically provide a facility and service like that proposed in this DCO application. There is no better alternative use for the site.
- 10.9 The Government is clear that additional runway capacity needs to be made available as soon as possible and significantly earlier than 2030 and any new runway provision at Heathrow Airport through using existing runways more intensively. The addition of a third runway at Heathrow Airport does not change the need for a freight-based airport at Manston. Even in the longer term, and after the proposed opening of Heathrow's third runway and to 2050, Manston provides the only airport infrastructure in the South East that can provide the capacity needed to support the demand predicted.

The Significant Benefits to the Region

- 10.10 Reopening Manston Airport will help deliver significant socio-economic benefits including economic prosperity and employment across Kent of an unprecedented scale. It will become a catalyst for much-needed growth especially for East Kent but across the UK. Historically, and to the present day, the valuable role that Manston could play especially in terms of its contribution to regional economic development has been fully accepted including in policy and strategy documents. The Proposed Development by RiverOak offers the opportunity for Manston Airport to develop as a business and employment destination and to deliver significant socio-economic benefits. It could become as Kent County Council once described 'one of the largest single generators of economic activity in the County' and is a genuine economic asset.

The Significant Local Support

- 10.11 It is evident from all three consultation events that there remains considerable local support for the Proposed Development with the economic, employment and regeneration benefits being highlighted as key beneficial impacts. Historically, and prior to its closure in 2014, there has been strong support for the airport including for expansion plans. The considerable support for the Proposed Development including from the new Leadership at Thanet District Council and adjoining authorities carries significant weight. Significant time and effort has been invested by RiverOak in consulting and refining the proposed development prior to submitting the Development Consent Order application

in order to limit adverse impacts where possible. Reopening Manston Airport is very much in the public's interest. It is sustainable development.

Overall Conclusions of the Planning Statement

- 10.12 The proposed development is consistent with the NPPF, national aviation policy and the requirements of other relevant planning policy and will provide significant benefits to the UK's aviation sector, to Kent and to the district of Thanet.
- 10.13 In light of the conclusions presented in the Environment Statement, there will not be any adverse effects after mitigation which would outweigh the benefits of the Proposed Development which include bringing the site back into beneficial use.
- 10.14 In terms of the overall planning balance, development consent for the Proposed Development should be granted.

APPENDIX 1 : DCO APPLICATION SITE BOUNDARY PLAN

APPENDIX 2 : ILLUSTRATIVE MASTERPLAN SHOWING THE PROPOSED DEVELOPMENT



MANSTON AIRPORT DEVELOPMENT CONSENT ORDER
MASTERPLAN - SITE LAYOUT
REGULATION 5(2)(o)
THANET DISTRICT COUNCIL

ILLUSTRATIVE PURPOSES ONLY

RSP



KEY

- Order Limits
- Buildings / Structures
- Grassed Area
- Landscaped Area
- Drainage Pond
- Museum Area
- Pavement & Aircraft Pavement

Notes

- OS Data obtained from emapsiterm May 2017; © Crown copyright and database rights 2017 Ordnance Survey 0100031673
- Existing runway pavement to be retained at request of EA and Southern Water to protect adit. Strategic removal of pavement will be required to install runway and airport infrastructure, details to be agreed with EA and Southern Water.

100m SCALE 1:7500

P14	Location plan updated	TAW	CJ	GD	29.03.18
P13	Application Number Added	KA	CJ	CJ	23.03.18
P12	Museum area updated, DCO boundary updated and notes added	TAW	CJ	GDD	21.03.18
P11	'Illustrative only' note added, Runways strip lines removed, business development area re-labelled, Aircraft recycling and ILS notes amended	TC	CJ	GD	26.02.18
P10	Red line boundary and title amended, Highway improvement works to Manston Road and Spitfire way extended, FBO area amended, Northern Business Park and annotation updated	TC	CJ	GDD	12.02.18
P09	Northern grass area and red line boundary updated and interior round about and passenger parking area also updated	KA	CJ	GDD	26.01.12
P08	PAPI, ILS and glide path navigational aids added, Existing NDB and DME annotation removed and MOD aerial note amended	SW	CJ	CJ	21.11.17
P07	Junction Updated	TAW	CJ	GDD	15.11.17
P06	Update business park and redundant runway pavement retained	TAW	CJ	GDD	09.11.17
P05	Taxiway Alignments, Junctions and Key Plan updated annotation amended, ILS locations shown	AAG	CJ	GDD	20.10.17
P04	DCO Boundary amended, Junction improvements shown on masterplan layout, Indicative MOD aerial location removed from Northern Area	TAW	CJ	GDD	13.10.17
P03	Helicopter stand H1 and H2 added to FBO area, 130m indicative clearance circle shown to relocated MOD arrival	TAW	CJ	GDD	26.09.17
P02	Layout Updated	RS	CJ	GDD	22.09.17
P01	First Issue	RS	CJ	CJ	04.09.17
Rev	Description	By	Ckd	Apr	Date

Project MANSTON AIRPORT
DEVELOPMENT CONSENT ORDER

Title MASTERPLAN - SITE LAYOUT
REGULATION 5(2)(o)
THANET DISTRICT COUNCIL

Document Number			Revision
NK018417 - RPS-MSE-XX-DR-C-2000			P14
Project Number	Originator - Zone - Level - Type - Role - Drawing Number		
Application Number - TR020002			
Scale	Sheet Size	Sheet No	Status
1:5000	A1	1 of 1	S.56

APPENDIX 3 : MANSTON AIRPORT PLANNING HISTORY

Application Reference	Address	Description of Development	Status
Manston Airport			
F/TH/15/0458	Building 4, Manston Airport, Spitfire Way, Manston, Ramsgate, CT12 5FF	Change of use from airport use to general industrial use	Dismissed at appeal 13-Jul-17
F/TH/15/0459	Manston Airport Cargo Centre & Responding Vehicle Point, Spitfire Way, Manston, Ramsgate, CT12 5FF	Change of use from airport use to storage and distribution use	Dismissed at appeal 13-Jul-17
F/TH/15/0460	Building South Of Terminal (Hanger 1), Manston Airport, Manston, Ramsgate, CT12 5BL	Change of use from airport use to general industrial for a temporary period of 3 years	Dismissed at appeal 13-Jul-17
F/TH/15/0457	Building 870, Manston Airport, Manston, Ramsgate, CT12 5BL	Change of use from airport use to general industrial use together with four storey extension and insertion of windows	Dismissed at appeal 13-Jul-17
OL/TH/16/0550	Manston Airport Manston Road Manston RAMSGATE Kent	Comprehensive redevelopment of the site involving the demolition of existing buildings and structures and removal of hard standing and associated infrastructure, and provision of mixed use development. Application submitted in hybrid form (part-outline and part-detailed). The outline element comprises an outline planning application (with all matters except Access reserved for future determination) for the provision of buildings/floorspace for the following uses; Employment (Use Classes B1a-c/B2/B8), Residential (Use Classes C3/C2), Retail (Use Classes A1-A5), Education and other non-residential institutions (Use Class D1), Sport and Recreation (Use Class D2), Hotel (Use Class C1), Open space/landscaping (including outdoor sport/recreation facilities), Car Parking, Infrastructure (including roads and utilities), Site preparation and other associated works. The full/detailed element of the application comprises; change of use of retained existing buildings, Development of Phase 1 comprising four industrial units (Use Class B1c/B2/B8) with ancillary car parking and associated infrastructure, Access.	Awaiting Decision 03-Jun-16
F/TH/15/0067	Land East Of Worlds Wonder, Manston Road, Manston, Ramsgate	Change of use of 8.1ha of agricultural land to use as a solar farm including the installation of associated solar panels. (approx 2.31m high) ancillary single storey buildings, substations, 2m high security fence & security camera	Refused Permission 13-Nov-15
F/TH/14/0645	Land East Of Worlds Wonder, Manston Road, Manston, Ramsgate	Change of use of land for use as a solar park including the installation of associated high solar panels (approx 2.31m), ancillary single storey buildings, substations and 2m high security fencing and security cameras	Refused Permission 13-Oct-14
CD/TH/13/0745	Kent International Airport, Manston, Ramsgate	Application for a certificate of proposed lawful development for the erection of helicopter hanger, workshop and ancillary space and associated hard standing to facilitate a new search and rescue facility at Kent International Airport, Manston	Cert issued planning permission

			not req 04-Nov-13
F/TH/11/0264	Spitfire And Hurricane Museum, Manston Road, Minster, Ramsgate, CT12 5DF	Retention of temporary portacabin for use in association with museum	Granted Permissio n 02-Jun-11
F/TH/10/0988	Building 870, Kent International Airport, Manston, Ramsgate	Erection of extension to accommodate preparatory holding pen/stable, erection of 2m high fence to enclose holding pen/stable, together with formation of hard standing.	Granted Permissio n 02-Feb-11
F/TH/10/0988	Building 870, Kent International Airport, Manston, Ramsgate	Erection of extension to accommodate preparatory holding pen/stable, erection of 2m high fence to enclose holding pen/stable, together with formation of hard standing	Granted Permissio n 17-Nov-10
R/TH/09/0558	Manston Court Garage, Manston Road, Manston, Ramsgate, CT12 5BH	Application for the approval of design, external appearance and landscaping for the erection of 120 bed hotel with conference facilities, pursuant to outline planning permission OL/TH/05/0866	Granted Permissio n 12-Oct-09
F/TH/09/0637	Kent International Airport, Manston, Ramsgate	Erection of mast for primary and secondary radar installations with associate transmitter and receiver building, within compound enclosed by 2.9 metre fence and associated sub station.	Granted Permissio n 30-July-09
F/TH/08/0508	Raf Manston Fire Training House, Manston, Kent, CT12 5BS	Erection of a 5 meter high street lighting column	Granted Permissio n 06-Jun-08
F/TH/08/0176	Spitfire & Hurricane Memorial Building, Manston Road, Ramsgate	Retention of temporary portacabin for use in association with Memorial building	Granted Permissio n 02-Apr-08
F/TH/07/1452	Raf Manston, Fire Training House, Manston, Kent, CT12 5BS	Erection of a two storey fire training house	Granted Permissio n 10-Dec-07
F/TH/07/1065	Kent International Airport, Manston, Ramsgate, CT12 5BP	Erection of electricity sub-station and associated works	Granted Permissio n 06-Aug-07
F/TH/07/1777	Kent International Airport, Manston, Ramsgate, CT12 5BP	Formation of combined silt trap and fuel interceptor, together with associated drainage alterations	Granted Permissio n 26-Mar-07
OL/TH/05/0866	RAF Manston, Fire Training House, Manston, Kent, CT12 5BS	Demolition of garage buildings and erection of 120 bedroom hotel with conference facilities	Granted Permissio n 13-Jul-06
F/TH/04/1569	London Manston Airport, Manston, Kent, CT12 5BS	Change of use of land fronting Manston Court Road for the purposes of an electricity primary substation and to provide a 33/11kV Electricity Substation consisting of three outdoor transformers and a single storey brick built switchroom	Granted Permissio n 02-Dec-04
F/TH/04/0463	London Manston Airport, Manston, Kent, CT12 5BS	Construction of car park with associated roads, landscaping and security fence, lighting and cameras.	Granted Permissio n 19-Apr-04
F/TH/03/0515	London Manston Airport, Manston, Kent, CT12 5BS	Installation of CCTV system including 9No. 8 metre camera masts, in connection with airport operation	Granted Permissio n 13-May-03

F/TH/02/1026	Land North Of Thanet Flying Club, London Manston Airport, Manston, Ramsgate, CT12 5BP	Erection of new aircraft maintenance hangar and boiler room (approx 6000 sqm), together with the provision of additional car parking, the re-alignment of the airport access road and formation of a new aircraft access to Taxiway Bravo.	Granted Permission 18-Oct-02
F/TH/01/0986	Spitfire And Hurricane Museum, Manston, Thanet, Kent.	Retention of temporary mobile building for use in association with memorial building	Granted Permission 29-Nov-01
F/TH/01/1022	Modern Jet Support Centre Limited, Hangar One, Manston Airport, Ramsgate, Kent CT12 5BL	widening of door opening to hangar 1 and provision of 20 metre high movable tail dock to northern elevation of hangar	Granted Permission 12-Nov-01
F/TH/01/0654	London Manston Airport, Manston, Kent	Provision of a new sub-station installation including standby generator	Granted Permission 10-Oct-01
F/TH/01/0940	London Manston Airport, (Airport Property Line B2190 Adj To Road Leading To Existing BF12) Manston, Kent	Creation of new entrance and access road from b2190 to taxiway alpha for refuelling lorries	Granted Permission 10-Oct-01
F/TH/01/0701	London Manston Airport, (B2050, Adjacent To The History Club & Spitfire & Hurricane Museum), Manston, Kent	Installation of surface water attenuation pond (17500 cubic metres) as part of airport surface water management programme, together with 1.8m high security fence	Granted Permission 25-Jul-01
F/TH/01/0654	London Manston Airport, Manston, Kent	Provision of a new sub-station installation including standby generator	Granted Permission 11-Jul-01
F/TH/01/0467	London Manston Airport, Manston, Kent	Installation of semi-automatic meteorological observing system	Granted Permission 16-May-01
F/TH/01/0463	London Manston Airport, Manston, Kent	Erection of paint spray hangar with associated 40m flues, aircraft stand, car park and new vehicular access	Granted Permission 16-May-01
F/TH/00/0297	London Manston Airport, Manston, Kent	Replacement and upgrading of passenger aprons, adjacent to existing passenger terminal, upgrading of cargo apron around existing western cargo shed, improvements and part realignment of linking taxiways, and construction of new hanger adjacent to cargo apron.	Granted Permission 01-Jun-00
F/TH/00/0230	Spitfire And Hurricane Museum, Manston, Thanet, Kent	Single storey extension to food preparation area	Granted Permission 02-May-00
F/TH/00/0356	London Manston Airport, Manston, Kent	Construction of glide path antenna and cabin and localiser aerial and cabin	Granted Permission 20-Apr-00
F/TH/99/0839	London Manston Airport, Manston, Kent	Use of part of airfield apron for dismantling of 5 no. commercial aircraft	Granted Permission 08-Oct-99
F/TH/99/0047	Spitfire & Hurricane Memorial Building, R.A.F., Manston, Thanet, Kent	Construction of coach park and new vehicular access	Granted Permission 03-Mar-99

F/98/1063	Manston Airport, Manston, Ramsgate	Development works to enable CAA certification of airfield comprising: visual control room, 3 no. portakabins, fire station extensions, antennae and cabins, perimeter security fencing, localiser aerial masts and diesel fuel tank	Granted Permission 22-Dec-98
F/TH/98/0350	Hurricane & Spitfire Memorial Building, Manston, Thanet, Kent	Siting of a mobile building for use in association with memorial building for a temporary period.	Granted Permission 19-Jun-98

CD-TH-98-0400	R.A.F. Manston, Manston, Kent	Certificate of Lawfulness for the proposed use of existing airfield buildings listed on the attached schedule in association with the use of the airfield for civilian purposes	Granted Permission 14-May-98
CD-TH-98-0399	R.A.F. Manston, Manston, Kent	Certificate of Lawfulness for the proposed retention of existing airfield buildings	Granted Permission 14-May-98
CD-TH-98-0398	R.A.F. Manston, Manston, Kent	Certificate of Lawfulness for the proposed use of the airfield for civilian purpose	Granted Permission 14-May-98
F/TH/97/0634	Kent International Airport, Manston, Thanet, Kent	Change of use from air training college to administration offices with out of hours medical surgery and pharmacy	Granted Permission 30-Sep-97
F/TH/96/0967	Jet Support Centre Kent International Airport Manston Ramsgate Kent	Extension of existing building to form workshop area	Granted Permission 25-Mar-97
F/94/0774	Hurricane & Spitfire Memorial Building, Manston, Thanet, Kent	Erection of a pitched roof side extension	Granted Permission 18-Nov-94
F/TH/93/0656	Kent International Airport, Manston, Thanet, Kent	Erection of a single storey classroom and office block with a temporary structure to provide emergency teaching and office facilities	Granted Permission 09-Dec-93
F/TH/93/0504	Kent International Airport, Manston, Thanet, Kent	Continued use of temporary buildings as offices	Granted Permission 07-Sep-93
G/TH/93/0031	R.A.F. Manston, Manston, Kent	Circular 18/84 consultation - erection of a conservatory extension	Raise no objection 03-Mar-93
M/TH/92/0476	R.A.F. Manston, Manston, Kent	Circular 18/84 consultation for the provision of a fuel dispense facility	Raise no Objections 23-Oct-92
F/TH/92/0668	Jet Support Centre Kent International Airport Manston Ramsgate Kent	Extension to existing hanger to provide engine overhaul shop and associated offices	Granted Permission 15-Oct-92
F/TH/92/0552	Hurricane & Spitfire Memorial Building, Manston, Thanet, Kent	Erection of a conservatory for use as cafe and sale of souvenirs associated with the museum and erection of toilets	Granted Permission 15-Sep-92
G/TH/92/0245	R.A.F. Manston, Manston, Kent	Re-siting of 2 existing temporary buildings	Granted Permission 14-May-92
G/TH/91/0761	R.A.F. Manston, Manston, Kent	Erection of a fire burning area control building	Not available 02-Oct-91

G/TH/91/0606	R.A.F. Manston, Manston, Kent	Underground fuel storage facility including bulk delivery point, access road and security fence	Not available 14-Aug-91
91/0129	Kent International Airport Manston Ramsgate Kent	Renewal of consent ref TH/88/1885 for provision of a temporary hanger	Appeal Lodged 08-Apr-91
TH/87/1454	n/a	Extension to RAF Manston spitfire memorial building	Granted 11-Jan-88
TH/87/1149	n/a	Erection of detached single and two storey buildings to provide fire school training sets	Granted 16-Nov-87
TH/87/0976	n/a	Retention of portakabin for use as office and passenger lounge	Granted 13-Nov-87
TH/87/0935	n/a	Provision of Junior ranks single living accommodation in two storey blocks	Granted 05-Oct-87
TH/87/0453	n/a	Siting of a temporary classroom building and a temporary portaloo ablution block	Granted 22-Jun-87
TH//86/1024	n/a	Sitting of a building for use as MOD police post, for temporary period of five years.	Granted 04-Dec-86
TH/86/0830	n/a	Circular 18/84 erection of a detached single storey relocatable folding, steel building to house fire vehicles	Granted 24-Oct-86
TH/86/0831	n/a	Circular 18/84 erection of a detached single storey radio equipment building, seven wooden aerial poles and a chain link perimeter fence	Granted 24-Oct-86
TH/86/0705	n/a	Construction of two storey building incorporating an officer's mess, 46 bedrooms and ancillary facilities.	Granted 12-Sep-86
TH/86/0099	n/a	Circular 18/84 submission, erection of 84 married quarters, construction of road and landscaping	Granted 15-May-86
TH/85/1223	n/a	Refurbishment of and alterations to air traffic control building	No objection 30-Jan-86
TH/84/0246	n/a	Relocation of prefabricated building for use as gliding/motor gliding club house and office	Granted 17-May-84
610	n/a	Installation of fuel tank	Granted 05-Jan-82
n/a	n/a	Erection of cargo shed on land at Herlick Road	Granted Permissio n 25-Jul-79
n/a	n/a	Provision of airline office	Granted Permissio n 25-Jul-79
n/a	n/a	Erection of 8 lock up garages	Granted Permissio n 25-May-79
n/a	n/a	Erection of a single storey building to be used as office and passenger lounge	Granted Permissio n 28-Mar-79
n/a	n/a	Erection of an aircraft pavilion	Granted Permissio n 08-Mar-79
n/a	n/a	Erection to an extension to aircraft hanger	Granted Permissio

			n 16-May-78
TH/74/4320	n/a	Erection of single storey building to provide additional sleeping quarters	Granted Permissio n 22-Dec-75
TH/74/209	n/a	Temporary buildings for radio workshops stores office	Granted Permissio n 05-Jul-74
CH/7/71/452	n/a	Use of land for airplane hanger	Granted Permissio n 21-Dec-71
CH/7/71/96	n/a	Change of use from aircraft hanger to cargo warehouse	Granted Permissio n 19-Feb-71
CH/7/70/408	n/a	Change of use from store for tyres to store in connection with glass fibre moulding	Granted Permissio n 20-Oct-70
CH/7/70/221	n/a	Change of use of building from storage to factory for glass fibre moulding	Granted Permissio n 13-Jul-70
CH/7/69/498	n/a	Addition to form passenger concourse and directors dining room	Granted Permissio n 11-Dec-69
CH/7/69/499	n/a	Retention of additional toilet accommodation	Granted Permissio n 11-Dec-69
CH/7/69/500	n/a	Erection of a passenger terminal building for airline use	Granted Permissio n 11-Dec-69
AT/CH/7/68/226	n/a	An advertisement sign	Granted Permissio n 01-Jul-68
CH/7/68/158	n/a	Erection of a spectator enclosure	Granted Permissio n 29-Apr-68
CH/7/68/3	n/a	Provision of propane gas installation	Granted Permissio n 02-Feb-68
CH/7/67/354	n/a	Construction of spectators enclosure	Granted Permissio n 11-Jul-67
CH/7/67/966	n/a	Erection of inspectors kiosk	Granted Permissio n 23-Mar-67
CH/7/66/395	n/a	Re-erection of 2 no. arcon pre-fabricated buildings	Granted Permissio n 24-Aug-66

CH/7/66/59	n/a	Use of Aircraft Hanger for maintenance of company's own aircraft	Granted Permission 25-Feb-66
CH/7/66/71	n/a	Addition to form passenger concourse and directors dining room	Granted Permission 22-Feb-66
CH/7/66/34	n/a	Additional toilet Accommodation	Granted Permission 04-Feb-66
n/a	n/a	Revised Plans in connection with terminal building	Granted Permission 16-Nov-65
CH/7/65/294	n/a	Re-alignment of junction of route B2050 with route B2190 and provision of 3 accesses to RAF Motor Transport yard	Granted Permission 27-Aug-65
CH/7/65/146	n/a	Erection of Hanger	Granted Permission 25-Mar-65
CH/7/64/769A	n/a	Revised plan for the erection of passenger terminal building for airline use	Granted Permission 15-Mar-65
CH/7/64/769	n/a	Erection of a passenger terminal building for airline use	Granted Permission 18-Feb-65
CH/7/64/768	n/a	Use of Land for the erection of a hanger	Withdrawn 05-Feb-65
99/377	London Manston Airport Kent International Airport Manston Ramsgate Kent	Use of crown and airfield land and buildings for commercial civilian airport use (Lawful Development Certificate)	Not available
98/400	London Manston Airport Kent International Airport Manston Ramsgate Kent	Proposed use of existing airfield buildings on site in association with the civilian use of the airfield (Lawful Development Certificate)	Not available
98/399	London Manston Airport Kent International Airport Manston Ramsgate Kent	Retention of existing airfield buildings on site (Lawful Development Certificate)	Not available
98/398	London Manston Airport Kent International Airport Manston Ramsgate Kent	The proposed use of the airfield for civilian purposes (Lawful Development Certificate)	Not available
F/TH/88/0121	London Manston Airport Kent International Airport Manston Ramsgate Kent	Erection of a passenger terminal building, new access road and car parking facilities on a site then referred to as the 'civilian enclave' to the east of the airport, south of Manston Road (subject to a S.106 Agreement which included night-time flying restrictions)	Not available
CH/7/66/137	n/a	Proposed erection of 5 no. officers garages and 11 no. airmen's garages	n/a
n/a	n/a	Install prefabricated offices	n/a
TH/82/0199	n/a	Operation office and passenger lounge	Granted n/a
n/a	n/a	Erection of clubhouse	n/a

TH/85/0874	n/a	Residential development to provide quarters for officers and airmen	No objection n/a
TH/85/0885	n/a	Erection of two detached hanger buildings	No objection n/a
TH/87/1277	n/a	Erection of a detached single storey passenger terminal building and provision of car parking area and associated facilities	n/a
TH/87/1378	n/a	Construction of new hanger offices and club-house and formation of new taxiway	n/a
TH/88/0121	n/a	Erection of a passenger terminal building , new access road and car parking facilities	n/a

APPENDIX 4 : JULY 2017 LOTHAIN SHELF (718) LIMITED PLANNING APPEAL DECISION

Appeal Decisions

Inquiry held on 14-17 March 2017

Site visit made on 17 March 2017

by M C J Nunn BA BPL LLB LLM BCL MRTPI

an Inspector appointed by the Secretary of State for Communities and Local Government

Decision date: 13th July 2017

Appeal A Ref: APP/Z2260/W/15/3140995

Building 1, Former Manston Airport, Kent, CT12 5BL

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a failure to give notice within the prescribed period of a decision on an application for planning permission.
 - The appeal is made by Lothian Shelf (718) Ltd against Thanet District Council.
 - The application Ref: F/TH/15/0460 is dated 15 May 2015.
 - The development proposed is described as 'change of use of Building 1 from sui generis to flexible B1(b-c), B2 and B8 for a temporary period of 3 years'.
-

Appeal B Ref: APP/Z2260/W/15/3140990

Building 2, Former Manston Airport, Kent, CT12 5BL

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
 - The appeal is made by Lothian Shelf (718) Ltd against the decision of Thanet District Council.
 - The application Ref: F/TH/15/0457, dated 15 May 2015, was refused by notice dated 22 October 2015.
 - The development proposed is described as 'change of use of Building 2 from sui generis to flexible B1(b-c), B2 and B8, small extension, marking out of car parking, and associated works'.
-

Appeal C Ref: APP/Z2260/W/15/3140992

Building 3, Former Manston Airport, Kent, CT12 5BL

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a failure to give notice within the prescribed period of a decision on an application for planning permission.
 - The appeal is made by Lothian Shelf (718) Ltd against Thanet District Council.
 - The application Ref: F/TH/15/0459 is dated 15 May 2015.
 - The development proposed is described as 'change of use of Building 3 from sui generis to flexible B1(b-c), B2 and B8'.
-

Appeal D Ref: APP/Z2260/W/15/3140994

Building 4, Former Manston Airport, Kent, CT12 5BL

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a failure to give notice within the prescribed period of a decision on an application for
-

planning permission.

- The appeal is made by Lothian Shelf (718) Ltd against Thanet District Council.
 - The application Ref: F/TH/0458 is dated 15 May 2015.
 - The development proposed is described as 'change of use of Building 4 from sui generis to flexible B1(b-c), B2 and B8'.
-

Decisions

1. Appeals A, B, C and D are all dismissed.

Procedural Matters

2. The single reason for refusal in respect of Appeal B was: "the proposed development, by virtue of the loss of a building for airport use, would create the potential need for additional buildings within the countryside and would not constitute essential airside development, contrary to Thanet Local Plan Policies CC1 and EC4 of the Thanet Local Plan, and Paragraphs 14 and 17 and guidance within the National Planning Policy Framework". With regards to Appeals A, C and D, the Council failed to determine the applications within the prescribed period. On 17 February 2016, the Council's Planning Committee resolved that, had it determined the applications, it would have refused permission for these applications for essentially the same reason as for Appeal B.
3. The Council initially resisted these appeals, and produced Statements of Case urging their dismissal. Subsequently, the Council indicated¹ that it no longer raised any objections to the four appeals, subject to the imposition of appropriate conditions. This followed the publication of a Report by AviaSolutions² into the commercial viability of the airport.
4. The Council's representative did not present any formal evidence to resist the schemes, apart from providing an opening statement³ setting out the new position, but attended throughout to provide support to the Inquiry and to participate in the discussion about conditions.
5. The Council, during the processing of the planning applications, revised the descriptions of the schemes, removing the 'flexible' nature of the uses sought. For the avoidance of doubt, I have dealt with the appeals as originally submitted on the basis of the 'flexible use'. Appeal A, concerning Building 1, relates to a change of use for a temporary period for three years, whereas in Appeals B, C and D, relating to Buildings 2, 3 and 4 respectively, the development is sought on a permanent basis.
6. RiverOak Strategic Partners Ltd ('RSP') appeared at the Inquiry as a Rule 6 Party, and gave detailed evidence inviting me to dismiss the appeals. RSP are promoting a project to reopen the airport. Although RSP currently have no legal ownership interest in the land, they are preparing to make an application for a Development Consent Order (DCO) to re-establish a predominantly cargo based aviation use at the site and are currently engaged in discussions with the Planning Inspectorate on this matter.

¹ Letter dated 15 December 2016

² Report on the Commercial Viability of Manston Airport, AviaSolutions (September 2016) [CD 14.2]

³ Inquiry Document 2

7. A DCO is the means of obtaining permission for developments categorised as Nationally Significant Infrastructure Projects. Such consents are assessed under a separate regime to these appeals and it is not my role to express a view on the matter of any forthcoming DCO, or to prejudge its findings. I also note that, given that the site is not currently in the ownership of RSP, and because acquisition through negotiation with the owners has been unsuccessful, the DCO process is likely to entail the acquisition of the appeal site under compulsory purchase powers, for which a compelling case in the public interest will have to be shown. Again, this is not a matter for this inquiry.

Main Issue

8. The main issue in all four appeals is the acceptability of the proposals having regard to the adopted development plan and national policy, and whether there are material considerations to justify a determination other than in accordance with the development plan.

Reasons

Background

9. Manston was first used as an airfield from around 1915-16. The runway was built in the 1940s and civilian use began in the 1950s and 1960s. The Ministry of Defence sold RAF Manston in 1998, and Manston Airport has been in various ownerships since. The four buildings subject of these appeals fall within the confines of Manston Airport, itself located outside the urban area. Airport activities ceased in 2014 and much of the necessary operational aviation infrastructure and equipment has now been removed. The airport is now closed and has no aerodrome licence.
10. Building 1 is located close to the main terminal building, whereas Buildings 2, 3 and 4 are all clustered along the northern boundary of the Airport adjacent to, and accessed from, Spitfire Way. Building 1 is a substantial aircraft hangar, with large opening doors to allow aircraft access. Building 2 is of a more modern design and construction than the other three buildings, with openings to the front and rear. Building 3 has front and back sliding doors. Building 4 is significantly smaller than the other appeal buildings. They were previously used respectively for aircraft maintenance; cargo handling, storage and produce inspection; and to quarantine and inspect animals. Building 4 is now occupied by a business. The buildings vary in condition, with Buildings 1 and 3 appearing to be in a relatively poor condition, and 2 and 4 in a fair condition.

National and Local Policy Context

11. The relevant legislation⁴ requires that the appeals be determined in accordance with the statutory development plan unless material considerations indicate otherwise. The statutory development plan comprises the Thanet Local Plan ('the Local Plan'), adopted in June 2006.
12. The Local Plan, in its chapter on Economic Development and Regeneration⁵, recognises Manston Airport as an important regional hub and business location,

⁴ Section 38(6) of the Planning and Compulsory Purchase Act 2004

⁵ Chapter 2

and notes that its proximity to business parks ensures a key role in the economic regeneration of the area⁶. The Local Plan also records that the airport should play an important part in the economic regeneration not just of Thanet, but of the whole of East Kent⁷.

13. Policy EC4 of the Local Plan is of most relevance to these appeals. The Proposals Map identifies the appeal site as falling within the 'Airside Development Area'. Policy EC4 reserves such land for airside development, and states that development proposals will require specific justification to demonstrate that an airside location is essential. Paragraph 2.74 of the Local Plan defines 'airside development' as uses with an operational requirement for direct access to aircraft and therefore dependent on a location immediately adjacent to the runway or capable of direct access to it via taxiways. All four appeal schemes are for flexible business uses, rather than uses for which an airside location is essential. As such, they are in conflict with Policy EC4 of the Local Plan. This conflict with the Local Plan is not disputed by the main parties.
14. The National Planning Policy Framework ('the Framework') sets out the Government's up-to-date planning policies and is a material consideration in planning decisions. Importantly, the Framework does not change the statutory status of the development plan for decision making. However, the Framework advises at Paragraph 215 that due weight should be given to relevant policies in existing plans according to their degree of consistency with the Framework. Paragraph 14 of the Framework is clear that where the development plan is absent, silent or out of date, permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.
15. It is the case that the Local Plan predates the Framework. Nonetheless, the Framework states that policies should not be considered out of date simply because they were adopted prior to the Framework's publication⁸. The Local Plan, as the appellant notes, is formally 'time expired', being designed to provide policy guidance up to 2011⁹. However, the mere age of a plan does not mean that it loses its statutory standing as the development plan. Furthermore, I find the overall approach of Policy EC4 to be consistent with the Framework. This recognises that plans should take account of the growth and role of airports and airfields in serving business, leisure, training, and emergency service needs¹⁰.
16. Policy EC4's approach is also consistent with the Government's Aviation Policy Framework (APF)¹¹. This recognises, amongst other things, that the aviation sector is a major contributor to the economy, facilitating trade and investment. The APF supports growth within a framework that maintains a balance between the benefits of aviation and its costs, particularly its contribution to climate change and noise. The APF also states in the short to medium term, a key

⁶ Paragraph 2.4

⁷ Paragraph 2.51

⁸ Paragraph 211

⁹ Local Plan, Page 5 [CD12.1]

¹⁰ Paragraph 33

¹¹ Aviation Policy Framework, March 2013 [CD 11.2]

priority is to work with the aviation industry and other stakeholders to make better use of existing runway capacity at all UK airports¹².

17. It is certainly the case that the Local Plan was written and came into force at a time when the airport was operational. For this reason, the appellant contends that the Local Plan policies in relation to the airport are couched in terms that are plainly out-of-date, and that whilst some weight attaches to them, it must be limited because of changed circumstances at the site, namely the closure of the airport¹³. Indeed, the Local Plan states that the Council 'should plan for 1 million passengers, and 250,000 tonnes of freight per annum by the end of the Plan period'¹⁴ which given subsequent events, was clearly optimistic.
18. Whilst the fact that the airport is not currently operational is an important material consideration in these appeals, it does not necessarily follow that the closure of the airport in 2014 means that the policies of the Local Plan should automatically be accorded less weight, or that they are necessarily out of date. It can often be the case that a landowner's aspirations for the use of a particular site may differ from those purposes identified in a statutory development plan. That fact does not, of itself, reduce the weight of the plan or its policies. If that were so, there would be little purpose to the statutory planning system, or identifying and allocating land for specific purposes. There is nothing before me to suggest that Policy EC4 only applies to an operational airport.
19. To sum up, I find the overall approach of Policy EC4 to be consistent with the Framework, and national aviation policy, notwithstanding its age and the fact it was drafted prior to the publication of the Framework. To that extent, I consider Policy EC4 continues to carry significant weight in the overall planning balance and that Paragraph 14 of the Framework does not apply in this case. However, it is relevant to consider whether there are other material considerations that warrant determining the appeals other than in accordance with the development plan. These considerations include the possibility of airport activities resuming in the future. I deal with this below.

Emerging Policy

20. A new Draft Local Plan is currently under preparation. The January 2015 Preferred Options Consultation sought, under Policy SP05, to designate Manston Airport as an 'Opportunity Area' for the purpose of preparing an 'Area Action Plan' (AAP) for the site. The AAP was to consider the 'retention, development and expansion of the airport and aviation operations', while 'exploring alternative options for the future development of the area for mixed-use development'.
21. Proposed revisions to the Draft Local Plan were published for consultation which took place between January 2017 and March 2017. The 2017 version of Policy SP05 takes a different approach in respect of the airport in that it is allocated as a 'mixed use settlement' with the capacity to deliver at least 2,500 homes and up to 85,000 sqm of employment and leisure floorspace. The

¹² Paragraph 10

¹³ Inquiry Document 1, Paragraph 10

¹⁴ Paragraph 2.65

Council acknowledged that the Draft Plan is in 'its comparatively early stages'¹⁵ and that the latest version is still subject to various outstanding objections, including in respect of Policy SP05.

22. The future of the airport will no doubt be considered in a future Examination of the Local Plan. As a strategic matter, it is also, as the Council notes, an issue that is likely to be relevant to the Duty to Co-operate¹⁶. The current stage of the Draft Local Plan means its policies may be subject to change. In these circumstances, and in accordance with Paragraph 216 of the Framework, little weight can be given to the Draft Local Plan at this time.

Relevance of Paragraph 22 of the Framework

23. This states that planning policies should avoid the long term protection of sites allocated for employment use where there is *no reasonable prospect* of a site being used for that purpose. The paragraph continues that where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses should be treated on their merits, having regard to market signals and the relative need for different land uses to support sustainable local communities.
24. Applying Paragraph 22, RSP argue that the land is reserved for a specific employment use, namely aviation use, by virtue of Policy EC4, and any change to a general B1 (b) and (c) B2 and B8 would constitute an alternative use in terms of Paragraph 22, for the purposes of Policy EC4. The appellant, by contrast, takes a broader interpretation of Paragraph 22 contending that since the proposed uses are also employment uses, there is no conflict with the underlying purposes of Paragraph 22. In other words, there is nothing in the Paragraph implying that it applies narrowly only to aviation use, and that it should be applied as written without imputing other meanings. On this basis, the appellant says that application of the test in Paragraph 22 does not assist much in assessing these appeals, if at all.
25. It seems to me that the precise meaning of Paragraph 22 is somewhat ambiguous and open to interpretation. I accept that the third sentence of Paragraph 22, unlike the first, refers to 'the allocated employment use' rather than 'employment uses' more generally. This lends weight to RSP's notion that, if applying Paragraph 22, it should be treated as referring to the specific airport employment use, by virtue of Policy EC4 of the Local Plan. However, there is a danger of an overly narrow or legalistic approach. Moreover the precise meaning of '*no reasonable prospect*' in this context is far from clear.
26. In my view, the test set out in Paragraph 22 is of limited assistance in determining the weight to the development plan. In any event, it cannot displace the approach set by statute, namely whether the appeals should be determined in accordance with the adopted development plan, or whether material considerations suggest otherwise. It is that latter approach that I prefer in assessing these appeals.

¹⁵ Inquiry Document 2, Paragraph 9

¹⁶ Inquiry Document 9, Paragraph 1.2

Possibility of airport use resuming

27. The appellant is of the view that there is not a realistic prospect of the airport use recommencing¹⁷. Reliance is placed on the AviaSolutions Report commissioned by the Council and published in September 2016 which concludes there is little prospect of a financially viable airport on the site¹⁸. However, and importantly, the AviaSolutions Report makes clear that it does not offer any opinion about the reasonableness or otherwise of RSP's plans for the airport¹⁹.
28. I heard evidence that three successive owners of the airport had been unable to run it viably. Submissions were made that RiverOak Investment Corporation, based in the United States, and experienced in major projects and financially well-resourced, is an entirely separate legal entity from RSP. On this basis, RSP's financial resources and expertise, as well as their ability to re-open the airport was questioned. The appellant also highlighted that there is no information in the public domain about the likely sources of funding for the project, which will be substantial. Nor has any detailed business plan been revealed. This, it is said, calls into question the entire delivery of RSP's project for Manston.
29. Furthermore, the appellant highlights the significant environmental aspects of the RiverOak's project which have yet to be assessed or impacts mitigated. An Environmental Impact Assessment would be required, as well as a Habitats Regulations Assessment. A cargo based operation is likely to have significant transport impacts, again requiring proper assessment. Because the land is in the ownership of another party, the DCO application will require the compulsory purchase of the land, and the relevant tests will need to be satisfied.
30. On the other hand, RSP have adduced detailed aviation evidence that, contrary to the conclusions of the AviaSolutions Report, the airport could be reopened and operated viably, with appropriate levels of investment²⁰. Detailed evidence was presented that the AviaSolutions Report was based on flawed assumptions and that the airport could be successfully developed as a mixed use airport, underpinned by a cargo operation, which could become an important infrastructure asset within the wider South East, and contribute to the local, regional and national economy. RSP were of the firm view that, subject to appropriate levels of investment, Manston would be capable of handling considerable air freight movements. The appellant did not call any aviation witnesses to directly rebut RSP's technical evidence, nor was RSP's key aviation evidence challenged²¹. However, the appellant made it clear that RSP's submissions on aviation were not accepted as correct.
31. Given this contradictory evidence, it is difficult to predict conclusively whether the airport will reopen or not. Indeed, no concluded view can be taken on RSP's proposals without all the information that will be required for inclusion in any DCO application. It must be stressed it is not the purpose of this inquiry to

¹⁷ Planning Statement, May 2015, Paragraph 1.3 [CD 5.1]

¹⁸ This Report informed the latest iteration of the 2017 Draft Local Plan in respect of Policy SP05, which allows for a range of non-aviation uses.

¹⁹ Page 14, Footnote 2

²⁰ Evidence of Mr George Yerrall, Dr Sally Dixon, and Mr Chris Cain

²¹ Neither Dr Dixon or Mr Cain were cross-examined by Mr King

judge the merits or otherwise of RSP's project, which would be a matter for any forthcoming DCO. However, in considering whether the proposals should be determined in accordance with Policy EC4 or not, it is relevant to consider, in the light of the evidence presented, and as matter of planning judgement, if there is some possibility of the airport use resuming.

32. There are clearly a number of very significant hurdles and myriad important matters to be resolved if RSP's ambitious plans are to proceed to fruition. It relies, amongst other things, on the necessary investment and ownership matters being resolved. RSP's plans would also be dependent on the environmental impacts being satisfactorily addressed and mitigated. These matters are for a future DCO application, the success or otherwise of which cannot be known at this time.
33. The appellant accepts that the possible resumption of airport use at the airport cannot be ruled out, because of RSP's emerging proposals²². I have found that Policy EC4 is consistent with the Framework, as well as national aviation policy, and should therefore continue to carry significant weight in these appeals. In these circumstances, and until a new policy framework exists at the airport, I find that the evidence at the Inquiry did not demonstrate that the likelihood of the airport reopening was so slim that the conflict with Policy EC4 should be disregarded.

Whether the proposals would compromise the future aviation use of the airport

34. Given there is no active aviation use at the airport, the proposals could be seen as making efficient use of existing under-used buildings, and as a pragmatic response following the airport's closure. That said, granting permission would undermine the current policy protection afforded to airport land and be seen as setting a precedent for non-airport related use. This is more likely to lead to a situation where other floorspace could become used for activities that have little or no relationship with an airport function. All the appeal buildings are specifically designed for airport related uses, and their use for non aviation uses would undermine, rather than assist, any future operation of an airport.
35. In the case of Building 1, a temporary permission is sought that would enable control over future use. This could be seen as a flexible response without prejudicing future options given that there is no presumption that a temporary grant of planning permission should be granted permanently. However, a situation could develop where significant areas could be used for temporary non aviation related purposes, undermining the underlying policy objective of the adopted Local Plan.
36. I acknowledge that Buildings 2, 3 and 4 are located towards the periphery of the site, with vehicular access from Spitfire Way. It may be the case that these buildings could be capable of use as discrete units within the airport. But this does not alter the fact that non aviation uses would compromise the objective of Policy EC4. Building 1 is not located peripherally but close to the main terminal building and its use for non airport related activity so close to the terminal building would be likely to give rise to operational difficulties were the airport use to resume.

²² Inquiry Document 20, Paragraph 18

37. It may well be the case that any successful DCO would include provision for a compulsory purchase order that would enable full vacant possession of the entire site to be secured, and that the proposed appeal schemes would not affect this process. In other words, were the site to be compulsorily acquired for the purposes of reopening the airport as part of a DCO, any existing occupiers could be given appropriate notice to leave their premises. However, I see no good reason to grant permission for non-aviation uses contrary to adopted development plan policy on the basis that non-conforming uses could be reversed in the future through a DCO. This would amount to granting permission under one regime only to override it under another.
38. Prior to withdrawing opposition to these appeals, the Council's actual and putative refusal grounds referred to the loss of buildings for aviation use potentially creating the need for additional buildings within the countryside, where under Policy CC1, there is a presumption against such development. The appeal buildings are all designed for specific aviation related uses and, as a consequence, new buildings could be required to replace those 'lost' to other non-aviation uses. That said, until any future airport operator is known, the exact operational requirements cannot be certain and it cannot be accurately predicted whether any future scheme would give rise to the need for additional buildings. This matter cannot be determinative in these appeals.
39. To sum up, even allowing for any DCO, it seems clear to me that granting permission for these schemes, contrary to Policy EC4, would be likely to compromise any future aviation use of the airport. It might set a precedent which would be difficult to resist. Consistent application of Policy EC4 is required to prevent the site becoming anything other than an airport, and speculative non-conforming commercial uses would undermine its designated aviation use. Indeed, the cumulative effect of such developments would mean that the airport, although currently closed, would begin to exhibit the characteristics more redolent of a business park, undermining the concept of an airport.

The availability of employment land

40. The Council, when it originally assessed the proposals, expressed the view that the appeal proposals were largely speculative and that alternative employment land existed within the district, including at Manston Business Park, adjacent to the airport²³. The Council's review of employment sites to inform the new Draft Local Plan has revealed a significant over-supply of employment land within the district. I understand the Council is proposing to re-allocate some 30 hectares of older, less suitable, employment land for alternative uses such as housing²⁴.
41. However, in terms of premises, the appellant contends that there is a comparatively low amount of existing floorspace available in the district, that existing industrial floorspace has consistently low vacancy rates, and that much of the existing employment accommodation is of poor quality. As part of the consultation process on the original planning applications, the Council's Head of Economic Development noted that there were very few existing units of this size within the District.

²³ Council's Statement [CD 19.7]

²⁴ Report to the Overview and Scrutiny Committee, 21st November 2016 [CD13.5]

42. I accept that, with the necessary remediation and adaptation works, the appeal buildings may fill a gap in the supply of employment floorspace of this type and kind. This would bring some benefits in terms of job creation and economic activity, to which I accord some weight, but as the appellant acknowledges, such benefits would be relatively modest²⁵.
43. Notwithstanding submissions about the paucity of existing premises of comparable size to the appeal buildings, there is plenty of land for industrial and business development in the district²⁶. It seems to me that, were there significant demand for employment premises, they would be built out on the land already identified for that purpose. The evidence before me suggests that premises are also available in the wider East Kent area since the tenant that was originally envisaged for Building 2 has found alternative accommodation. Overall, I am not persuaded that a lack of alternative employment land or premises is a reason to allow these appeals at this airport location, or that it justifies departure from Policy EC4 of the Local Plan.

Other matters

44. The appellant's submissions make it clear that there is no intention to re-open the site as an airport, since it was acquired with the aspiration to promote a comprehensive redevelopment for mixed uses²⁷. Indeed, it is promoting a comprehensive mixed use scheme, comprising amongst other things some 2,500 new dwellings and up to 85,000 sqm of employment and leisure floorspace, retail, education, sport and recreation uses as well as open space, and associated infrastructure²⁸. It is argued that this site-wide scheme would bring significant social, economic and environmental benefits. However, this scheme is not before me, and so I make no judgement on its merits.
45. Reference has been made to 'Operation Stack'²⁹ which allows part of the runway to be used for non-aviation uses, namely the stationing of goods and vehicles, the use of the control tower as a co-ordination centre and the erection of temporary structures. To date, it has not been used for that purpose. Drawing parallels with the appeal proposals, the appellant argues that 'Operation Stack' indicates the acceptability of a non-aviation use on a temporary basis at the site, which would not prejudice the potential longer term use of the airport.
46. However, I do not consider that this temporary Order lends any support for the appeal proposals. It seems to me that 'Operation Stack' is a short term temporary measure of expediency to alleviate acute and specific problems of traffic congestion on the M20 and surrounding roads, until a longer term solution is found. It does not grant permanent planning permission at the airport for non aviation uses, in the way that three of the four appeal proposals would. The circumstances are markedly different, and I consider that 'Operation Stack' cannot provide justification for these appeals.

²⁵ Inquiry Document 20, Paragraph 59

²⁶ Ibid, Paragraph 56

²⁷ Proof of Evidence of Nicholas Alston, Paragraph 6.29

²⁸ Stonehill Park Planning Application Summary Document [CD 18.2]

²⁹ Town and Country Planning (Operation Stack) Special Development Order 2015 & Town and Country Planning (Operation Stack) Special Development Order 2016

Overall Conclusions and Planning Balance

47. The relevant legislation requires that the appeal be determined in accordance with the statutory development plan unless material considerations indicate otherwise. The Framework states that proposals should be considered in the context of the presumption in favour of sustainable development, which is defined by the economic, social, and environmental dimensions and the interrelated roles they perform.
48. I have carefully considered the various arguments made by the appellant in support of these appeals. The re-use of the buildings would generate certain economic benefits, although as the appellant notes, they would be relatively modest. The proposals could be seen as making efficient use of existing under-used buildings, and as a pragmatic response to the fact that the airport has not been operational since 2014. I have also weighed in the balance that the Council has changed its original stance, and is no longer resisting these appeals.
49. Balanced against these factors is the conflict with the adopted development plan, which recognises the economic importance of the airport and safeguards the appeal site for aviation uses. Such an approach is in accordance with the Framework and with national aviation policy. In these respects, I consider Policy EC4 continues to carry significant weight in the overall planning balance. I make no judgement on the merits or otherwise of RSP's plans, or their future success. However, given a DCO application is currently being prepared, the possibility of the site being used as an airport in the future cannot be ruled out. This being so, and until a new policy framework exists at the airport, I see little justification for departing from adopted development plan policy which identifies the appeal site as falling within the 'Airside Development Area' where aviation uses are appropriate.
50. I have taken account of the appellant's contention that the resumption of airport use by RSP would not be prejudiced or compromised if these appeals were allowed because any future DCO would likely include compulsory purchase powers to secure vacant possession of the airport. However, I am not persuaded that granting permission for development that does not accord with the development plan can be justified on the basis that compulsory purchase powers can be used to reverse it in the future.
51. I have taken into consideration the latest emerging local planning policy which proposes to re-designate the airport for mixed use development. However, the consultation process has only recently occurred and the emerging Plan is subject to various outstanding objections and its policies may change. In accordance with Paragraph 216 of the Framework, I find little weight can be given to the emerging policy.
52. Overall, I conclude that the appeal schemes would conflict with Policy EC4 of the Local Plan, as well as its wider economic development and regeneration objectives. The proposals would conflict with the Council's current approach to the location of new development within the airport, which is consistent with national policy. The benefits of the scheme put forward by the appellants do not justify departure from Policy EC4 of the Local Plan. Hence I find there are no material considerations of sufficient weight that would warrant a decision

other than in accordance with the development plan. Accordingly, I conclude that the appeals should be dismissed.

Matthew C J Nunn

INSPECTOR

APPEARANCES

FOR THE APPELLANT:

Mr Neil King QC of Counsel, Instructed by Herbert Smith
Freehills LLP

He called

Mr Nicholas Alston Director, Bilfinger GVA

FOR RIVEROAK STRATEGIC PARTNERS:

Miss Suzanne Ornsby QC and

Miss Melissa Murphy of Counsel, Instructed by Bircham Dyson Bell

They called

Mr Christopher Cain Director, Northpoint Aviation Services Ltd

Dr Sally Dixon Business and Aviation Consultant, Azimuth
Associates

Mr George Yerrall Director, RiverOak Strategic Partners Ltd

Ms Angela Schembri Planning Director, RPS Group

FOR THE COUNCIL

Mr Iain Livingstone Planning Applications Manager, Thanet District
Council

INTERESTED PERSONS

Ros McIntyre No Night Flights

Dr Beau Webber Save Manston Airport Association

Mr Simon Crow

Mr Rex Goodban

Sir Roger Gale MP

Sue Girdler

DOCUMENTS SUBMITTED AT THE INQUIRY

1. Opening Statement on behalf of the Appellants
2. Opening Statement by the Council
3. Opening Statement by RiverOak Strategic Partners Ltd
4. Statement of Dr Beau Webber
5. Statement of Ms R McIntyre
6. Statement of Mr Simon Crow
7. List of draft conditions, annotated by RiverOak Strategic Partners
8. "Caxtons" bundle comprising particulars of employment land and property in East Kent
9. Report for Council Cabinet on 20th March 2017 on Proposed Revisions to Thanet District Council's Local Plan (Preferred Options)
10. Local Plan Proposals Map
11. Statement of Mr Rex Goodban
12. Statement of Ms Sue Girdler
13. Extract of House of Commons Transport Committee Report- 'Smaller Airports', Ninth Report of Session 2014-2015, dated 9th March 2015
14. Updated Draft Schedule of Conditions
15. Submissions of Sir Roger Gale MP
16. Schedule of employment land & premises, dated 17th March 2017-04-28
17. Further details of employment land & premises
18. Updated Statement of Common Ground, dated 17th March 2017
19. Closing Submissions of RiverOak Strategic Partners
20. Closing Submissions of the Appellant

**APPENDIX 5 : LOCAL PLANNING POLICIES – SAVED
POLICIES FROM THE 2006 ADOPTED THANET DISTRICT
LOCAL PLAN AND EMERGING POLICIES IN THE NEW THANET
DISTRICT LOCAL PLAN (2015 AND 2017 CONSULTATION
VERSIONS)**

Relevant Saved Policies from the 2006 adopted Thanet District Local Plan and the Emerging Policies from the draft new Thanet District Local Plan (2015 and 2017 Consultation Drafts)

Chapter	Subject	Policy Number	Policy
Thanet Local Plan 2006 Saved Policies			
2	Economic Development and Regeneration	Policy EC2	<p>Kent International Airport</p> <p>Proposals that would support the development, expansion and diversification of Kent International Airport will only be permitted subject to the following requirements:</p> <ol style="list-style-type: none"> 1. Demonstrable compliance with the terms of the current agreement under Section 106 of the Town and Country Planning Act 1990 or subsequent equivalent legislation; 2. New built development is to be designed to minimise visual impact on the open landscape of the central island. particular attention must be given to roofscape and to minimising the mass of the buildings at the skyline when viewed from the south; 3. Appropriate landscaping schemes, to be designed and implemented as an integral part of the development; 4. Any application for development for the purpose of increasing aircraft movements in the air or on the ground, auxiliary power or engine testing, must be supported by an assessment of the cumulative noise impact and the effectiveness of mitigation measures to be implemented in order to minimise pollution and disturbance. the acceptability of proposals will be judged in relation to any identified and cumulative noise impact, the effectiveness of mitigation and the social and economic benefits of the proposals; 5. An air quality assessment in compliance with Policy EP5, to demonstrate that the development will not lead to a harmful deterioration in air quality. permission will not be given for development that would result in national air quality objectives being exceeded; 6. Development will not be permitted within the airport complex to the south of the airside development site identified in Policy EC4, unless it has been demonstrated that the development is necessary for the purpose of air traffic management; 7. Any new development which would generate significant surface traffic must meet requirements for surface travel demand in compliance with Policy EC3. 8. It must be demonstrated that new development cannot contaminate groundwater sources or that appropriate mitigation measures will be incorporated in the development to prevent contamination.

2	Economic Development and Regeneration	Policy EC4	<p>Airside Development Area</p> <p>Land at the airport, as identified on the proposals map, is reserved for airside development. Development proposals will require specific justification to demonstrate that an airside location is essential to the development proposed. Development will be required to retain sufficient land to permit access by aircraft of up to 65m (217ft) wingspan to all parts of the site.</p>
2	Economic Development and Regeneration	Policy EC5	<p>Land at, and East of, the Airport Terminal</p> <p>Until such time as a new airport terminal is built, land at, and east of, the existing airport terminal is identified on the proposals map for airport terminal-related purposes. Uses will be restricted to those which directly support or complement the operational requirements of the existing airport terminal. Should a new terminal be built, other airport-related development will be permitted on this allocated site. Planning conditions or planning agreements will be applied to limit any development granted planning consent to uses conforming to this policy.</p>
2	Economic Development and Regeneration	Policy EC6	<p>Fire Training School/Mod Complex</p> <p>If the current use of the fire training school or adjoining land ceases, the local planning authority will support the development of airport or airport-related uses, which would assist in the expansion of the airport. These could include:</p> <ol style="list-style-type: none"> 1. educational/training uses (such as fire training); 2. hotels; 3. car parking; or 4. uses falling within use Classes A2 and B1, with an airport orientation.
5	Transportation	Policy TR3	<p>Provision of Transport Infrastructure</p> <p>The District and County Councils will ensure, by means of a legal agreement that proper provision is made for transport infrastructure that is necessary and relevant to the development to be permitted. Proposals for transport infrastructure will be assessed in terms of their impact on capacity and safety of the transport network together with their social and economic impacts.</p>

5	Transportation	Policy TR12	<p>Cycling</p> <p>In order to promote increased use of cycling:</p> <ul style="list-style-type: none"> a) The council will seek the provision at the earliest opportunity, of a network of cycle routes. Planning permission will not be granted for any development, which would prejudice the implementation of proposed cycle routes; b) The council will seek the incorporation of facilities for cyclists into the design of new and improved roads, junction improvements and traffic management proposals; c) Substantial development generating travel demand will be required to provide convenient and secure cycle-parking and changing facilities. Proposals to provide such facilities as part of development proposals in town centres and at transport interchanges, schools and places of employment will be permitted; and d) In new residential development facilities for the secure parking and storage of cycles should be provided or, in exceptional circumstances where not provided, the design should facilitate the provision in future.
5	Transportation	Policy TR15	<p>Green Travel Plans</p> <p>Development proposals likely to generate significant travel demand and/or traffic movement will be required to demonstrate, through green travel plans, specific measures to encourage and facilitate use of walking, cycling and public transport in preference to private car travel.</p> <p>The Council will seek to approve measures, which will assist implementation of green travel plans and school travel plans.</p>
5	Transportation	Policy TR16	<p>Car Parking Provision</p> <ul style="list-style-type: none"> a) Proposals for development will be required to make satisfactory provision for the parking of vehicles (including, where appropriate, service vehicles). b) Proposals seeking car parking provision above the standards set out in Appendix G will not be permitted. c) In conservation areas where provision of parking in line with this policy would be detrimental to the character of the conservation area or have an adverse effect on the setting of a listed building or ancient monument then exceptions may be made. d) Within the town centre areas of Ramsgate, Margate and Broadstairs (as defined on the proposals map), new development proposals will not be required or expected to provide on-site car parking spaces. On site non-operational parking for a2/b1 use will be resisted.

6	Design	Policy D1	<p>Design Principles</p> <ol style="list-style-type: none"> 1. All new development is required to provide high quality and inclusive design, sustainability, layout and materials. 2. A new development proposal will only be permitted if it: <ol style="list-style-type: none"> a) respects or enhances the character or appearance of the surrounding area, particularly in scale, massing, rhythm, and use of materials appropriate to the locality; b) is compatible with neighbouring buildings and spaces and does not lead to unacceptable loss of amenity through overlooking, noise or vibration, light pollution, overshadowing, loss of natural light, or sense of enclosure; c) incorporates where practicable a high degree of permeability for pedestrians and cyclists and also considers access for public transport; d) incorporates provision for disabled access; e) retains open spaces, gaps in development, mature trees, other vegetation and any other features that contribute to biodiversity and the quality of the local environment; f) incorporates new landscaping as an integral part (as set out in Policy D2); g) incorporates, where appropriate, wildlife habitats, wildlife corridors and initiatives for their long term management; h) incorporates measures to prevent crime and disorder, promotes public safety and security and the perception of public safety and security; i) incorporates, where practical and appropriate, high quality integrated public art which is relevant to the site and locality; j) provides safe and satisfactory means of pedestrian and, where provided, vehicle access; k) provides for clothes drying facilities and refuse disposal or dustbin storage; and l) incorporates sustainable drainage systems.
6	Design	Policy D2	<p>Landscaping</p> <p>The following elements will be required as part of landscaping proposals for any new development:</p> <ol style="list-style-type: none"> 1. The enhancement of the development site in its setting; 2. The retention (and protection during site works) of as many of the existing trees, hedges and other habitat features on site as possible; 3. On sites of one hectare or more, the setting aside of 10% of the development site for the planting of native tree species, either within or at the boundary of the development site; 4. The maximising of nature conservation opportunities where development is proposed in proximity to existing open space or wildlife habitats, and

			<p>5. Where both appropriate and possible, the provision of landscaping in advance of new development to facilitate the assimilation of new development into the landscape.</p> <p>The District Council will require to be satisfied that the developer has made adequate arrangements to ensure continued maintenance of landscaping, and may seek to secure arrangements for this purpose by entering into a planning agreement.</p>
7	Heritage	Policy HE11	<p>Archaeological Assessment</p> <p>In order to determine planning applications, the district council may require the developer/applicant to provide additional information, in the form of an assessment of the archaeological or historic importance of the site in question and the likely impact of development. In certain cases such assessment may involve fieldwork or an evaluation excavation.</p> <p>Where the developer/applicant is not prepared to arrange such an assessment voluntarily, the district council will use its powers to direct that such information be supplied. Planning permission will be refused without adequate assessment of the archaeological implications.</p>
7	Heritage	Policy HE12	<p>Archaeological Sites and Preservation</p> <p>Archaeological sites will be preserved and protected. On those archaeological sites where permanent preservation is not warranted, planning permission will only be granted if arrangements have been made by the developer to ensure that time and resources are available to allow satisfactory archaeological investigation and recording by an approved archaeological body to take place, in advance of and during development. No work shall take place until the specification and programme of work for archaeological investigation, including its relationship to the programme of development, has been submitted and approved.</p>
10	Countryside and Coast	Policy CC1	<p>Development in the Countryside</p> <p>The Thanet countryside is defined as those areas of the district outside the identified urban and village confines.</p> <p>Within the countryside, new development will not be permitted unless there is a need for the development that overrides the need to protect the countryside.</p>
10	Countryside and Coast	Policy CC2	<p>Landscape Character Areas</p> <p>Within the landscape character areas identified on the proposals map, the following policy principles will be applied:</p> <ol style="list-style-type: none"> 1. At Pegwell Bay priority will be given to the conservation and enhancement of the natural beauty of the landscape over other planning considerations; 2. In the former Wantsum channel area, new development will not normally be permitted; 3. In the Wantsum channel north shore area, development will only be permitted that would not damage the setting of the Wantsum channel, and long views of Pegwell Bay, the Wantsum channel, the adjacent marshes and the sea;

			<p>4. On the central chalk plateau, a number of sites are identified for various development purposes. where development is permitted by other policies in this plan, particular care should be taken to avoid skyline intrusion and the loss or interruption of long views of the coast and the sea;</p> <p>5. At Quex Park, new development proposals should respect the historic character of the parkland; and</p> <p>6. At the urban coast, development that does not reflect the traditional seafront architecture of the area, maintain existing open spaces and long sweeping views of the coastline will not be permitted.</p> <p>Development proposals that conflict with the above principles will only be permitted where it can be demonstrated that they are essential for the economic or social well-being of the area.</p> <p>In the event of a real and specific threat to the landscape character of these areas from permitted development, the use of article 4 directions will be considered, and secretary of state approval for the direction sought.</p>
12	Nature Conservation	Policy NC3	<p>Local Wildlife Sites</p> <p>Development which would be damaging to the following sites of nature conservation interest as defined on the proposals map, or any sites so designated in the future, either in the long term or the short term, will not be permitted:</p> <ol style="list-style-type: none"> 1. Monkton Chalk Pit; 2. St. Peter's Churchyard; 3. North Foreland and golf course roughs; 4. Minster Station environs; 5. Ash levels (part); 6. St. Nicolas at Wade Churchyard; 7. St. Mary Magdalene Churchyard Monkton; and 8. Ramsgate Cemetery. <p>Exceptionally, where a strategic need is identified, at least an equivalent area of corresponding habitat will be expected to be created, at the developer's expense, at a suitable location in the district, and well related to other existing habitats.</p>
13	Environmental Protection	Policy EP5	<p>Local Air Quality Monitoring</p> <p>Proposals for new development that would result in the national air-quality objectives being exceeded will not be permitted.</p> <p>Development proposals that might lead to such an exceedance, or to a significant deterioration in local air quality resulting in unacceptable effects on human health, local amenity or the natural environment, will require the submission of an air quality assessment, which should address:</p> <ol style="list-style-type: none"> 1. the existing background levels of air quality; 2. the cumulative effect of further emissions;

			3. The feasibility of any measures of mitigation that would prevent the national air quality objectives being exceeded, or would reduce the extent of air quality deterioration.															
13	Environmental Protection	Policy EP7	<p>Aircraft Noise</p> <p>Applications for noise sensitive development or redevelopment on sites likely to be affected by aircraft noise will be determined in relation to the latest accepted prediction of existing and foreseeable ground noise measurement of aircraft noise.</p> <p>Applications for residential development will be determined in accordance with the following noise exposure categories.</p> <table><tr><th>NEC</th><th colspan="2">Predicted aircraft noise levels (dbi aeq.0700-23.00)</th></tr><tr><td>a</td><td><57</td><td>Noise will not be a determining factor</td></tr><tr><td>b</td><td>57-63</td><td>Noise will be taken into account in determining applications, and where appropriate, conditions will be imposed to ensure an adequate level of protection against noise (Policy EP8 refers).</td></tr><tr><td>c</td><td>63-72</td><td>Planning permission will not be granted except where the site lies within the confines of existing substantially built-up area. Where residential development is exceptionally granted, conditions will be imposed to ensure an adequate level of protection against noise (Policy EP8 refers).</td></tr><tr><td>d</td><td>>72</td><td>Residential development will not be permitted.</td></tr></table> <p>Applications for non-residential development including schools, hospitals and other uses considered sensitive to noise will not be permitted in areas expected to be subject to aircraft noise levels exceeding 60 db (a) unless the applicant is able to demonstrate that no alternative site is available. Proposals will be expected to demonstrate adequate levels of sound insulation where appropriate in relation to the particular use.</p>	NEC	Predicted aircraft noise levels (dbi aeq.0700-23.00)		a	<57	Noise will not be a determining factor	b	57-63	Noise will be taken into account in determining applications, and where appropriate, conditions will be imposed to ensure an adequate level of protection against noise (Policy EP8 refers).	c	63-72	Planning permission will not be granted except where the site lies within the confines of existing substantially built-up area. Where residential development is exceptionally granted, conditions will be imposed to ensure an adequate level of protection against noise (Policy EP8 refers).	d	>72	Residential development will not be permitted.
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13	Environmental Protection	Policy EP8	<p>Aircraft Noise and Residential Development</p> <p>When planning consent is granted for residential development on any land expected to be subject to a level of aircraft noise of above 57db(a)**, such consent will be subject to provision of a specified level of insulation to achieve a minimum level of sound attenuation in accordance with the following criteria:</p> <table><tr><th>NEC</th><th colspan="2">Predicted aircraft minimum noise levels attenuation required (db(a) (frequency range 100-3150 h)</th></tr><tr><td>a</td><td><57</td><td>No attenuation measures required</td></tr><tr><td>b</td><td>57-63</td><td>20db</td></tr><tr><td>c</td><td>63-72</td><td>30db</td></tr></table>	NEC	Predicted aircraft minimum noise levels attenuation required (db(a) (frequency range 100-3150 h)		a	<57	No attenuation measures required	b	57-63	20db	c	63-72	30db			
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b	57-63	20db																
c	63-72	30db																

			** LAeq 57dB 07.00-23.00																																																								
13	Environmental Protection	Policy EP9	<p>Light Pollution</p> <p>Development that includes the provision of new outdoor lighting should be designed to minimise light glare, light trespass, spillage and sky glow so as to preserve residential amenity, the character of the surroundings and prevent disturbance to identified wildlife areas.</p> <p>Proposals that are unacceptable in these respects, or which exceed the following maximum limits, will not be permitted.</p> <table><tr><th colspan="8">Obtrusive light limitations for exterior lighting installations</th></tr><tr><th>Environmental zones</th><th>Sky glow</th><th colspan="2">Light into windows ev[lux]</th><th colspan="2">Source intensity I[kcd]</th><th colspan="2">Building luminance (before curfew)</th></tr><tr><th></th><th>upward light ratio [max %]</th><th>before curfew</th><th>after curfew</th><th>before curfew</th><th>after curfew</th><th>av. I (cd/m²)</th><th>max. I (cd/m²)</th></tr><tr><td>E1</td><td>0</td><td>2</td><td>1</td><td>0</td><td>0</td><td>0</td><td>0</td></tr><tr><td>E2</td><td>2.5</td><td>5</td><td>1</td><td>20</td><td>0.5</td><td>5</td><td>10</td></tr><tr><td>E3</td><td>5.0</td><td>10</td><td>2</td><td>30</td><td>1.0</td><td>10</td><td>60</td></tr><tr><td>E4</td><td>15.0</td><td>25</td><td>5</td><td>50</td><td>2.5</td><td>25</td><td>150</td></tr></table>	Obtrusive light limitations for exterior lighting installations								Environmental zones	Sky glow	Light into windows ev[lux]		Source intensity I[kcd]		Building luminance (before curfew)			upward light ratio [max %]	before curfew	after curfew	before curfew	after curfew	av. I (cd/m ²)	max. I (cd/m ²)	E1	0	2	1	0	0	0	0	E2	2.5	5	1	20	0.5	5	10	E3	5.0	10	2	30	1.0	10	60	E4	15.0	25	5	50	2.5	25	150
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E4	15.0	25	5	50	2.5	25	150																																																				
13	Environmental Protection	Policy EP13	<p>Groundwater Protection Zones</p> <p>If a proposed development in the groundwater protection zones identified on the proposals map would have the potential to result in a risk of contamination of groundwater sources, it will not be permitted unless adequate mitigation measures can be incorporated to prevent such contamination taking place.</p>																																																								
14	Community Facilities	Policy CF2	<p>Development Contributions</p> <p>Where a proposed development would directly result in the need to provide new or upgraded community facilities (including transport infrastructure, educational or recreational facilities or affordable housing), the local planning authority will negotiate with the applicant for a contribution towards the cost of such provision, which is fairly and reasonably related in scale and in kind to the proposed development. A planning obligation to secure the contribution will normally be sought.</p>																																																								

Draft Thanet Local Plan 2031 Preferred Options Consultation (January 2015)			
	Local Plan Strategy	Policy SP01	<p>National Planning Policy Framework – Presumption in favour of sustainable development</p> <p>When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work 18 proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.</p> <p>Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.</p> <p>Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise . taking into account whether:</p> <ul style="list-style-type: none"> Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or Specific policies in that Framework indicate that development should be restricted.
	Strategic Priorities and Objectives	Strategic Priority 1	Create additional employment and training opportunities, to strengthen and diversify the local economy and improve local earning power and employability.
	Strategic Priorities and Objectives	Strategic Priority 5	Deliver the infrastructure required to support existing communities and new development, including an efficient and effective transport system.
4	Environment Strategy	Policy SP20	<p>Development in the Countryside</p> <p>Development in the countryside outside of the urban and village confines, as identified in the Thanet Local Plan 2006, and not otherwise allocated for development, will not be permitted unless there is a need for the development that overrides the need to protect the countryside and any adverse environmental effects can be avoided or fully mitigated.</p>
4	Environment Strategy	Policy SP22	<p>Protection and Enhancement of Thanet's Historic Landscapes</p> <p>Development proposals should demonstrate that their location, scale, design and materials will protect, conserve and, where possible, enhance:</p> <ol style="list-style-type: none"> 1) Thanet's local distinctiveness including historical, biodiversity and cultural character, 2) gaps between Thanet's towns and villages, 3) visually sensitive skylines and seascapes, <p>Within the landscape character areas identified, the following policy principles will be applied:</p> <ol style="list-style-type: none"> 1) At Pegwell Bay, priority will be given to the conservation and enhancement of the natural beauty of the landscape over other planning considerations;

			<p>2) In the former Wantsum Channel area, new development will not normally be permitted;</p> <p>3) In the Wantsum Channel North Shore Area, development will only be permitted that would provide opportunities for enhancement and would not damage the setting of the Wantsum Channel, and long views of Pegwell Bay, the Wantsum Channel, the adjacent marshes and the sea;</p> <p>4) On the Central Chalk Plateau, a number of sites are identified for various development purposes. Where development is permitted by other policies in this plan, particular care should be taken to avoid skyline intrusion and the loss or interruption of long views of the coast and the sea, and proposals should demonstrate how the development will take advantage of and engage with these views;</p> <p>5) At Quex Park, new development proposals should respect the historic character of the parkland and gardens; and</p> <p>6) At the Urban Coast, development that does not respect the traditional seafront architecture of the area, maintain existing open spaces and long sweeping views of the coastline will not be permitted.</p> <p>Development proposals that conflict with the above principles will only be permitted where it can be demonstrated that they are essential for the economic or social well-being of the area or for reasons where the need for the development outweighs the detriment to the landscape. The developer may be required to submit a Landscape and Visual Impact Assessment with any development proposals likely to have a significant landscape impact</p>
4	Environment Strategy	Policy SP23	<p>Green Infrastructure</p> <p>Thanet's green infrastructure network is an integral part of the design of all major development. Opportunities to improve Thanet's green infrastructure network by protecting and enhancing existing green infrastructure assets and the connections between them, should be included early in the design process for major developments.</p> <p>Development should make a positive contribution to Thanet's green infrastructure network by:</p> <ul style="list-style-type: none"> • Creating new wildlife and biodiversity habitats • Providing and managing new accessible open space • Mitigating against the loss of any farmland bird habitats • Providing private gardens and play space; and/or • Contributing towards the enhancement of Thanet's Biodiversity Opportunity Areas or the enhancement of the Green Wedges <p>Investment and developer contributions should be directed to improve and expand green infrastructure and provide connecting links where opportunities exist.</p>

4	Environment Strategy	Policy SP25	<p>Protection of the European Sites, Sites of Special Scientific Interest and National Nature Reserve</p> <p>Development that would have a detrimental impact on the European Sites, Sites of Special Scientific Interest or National Nature Reserve will not be permitted.</p> <p>Planning permission may only be granted when it can be demonstrated that any harm to internationally and nationally designated sites resulting from that development will be suitably mitigated.</p> <p>Proposals for residential development must include an assessment of significant effects and measures to mitigate against the effects of potential increased recreational pressure on protected sites. Proposals for major residential developments must include provision of open space suitable for dog walking and general recreation, in accordance with Policy SP23.</p> <p>In developing these measures, regard must be had to the SPA Mitigation Strategy which requires a financial contribution towards wardening, and applicants must demonstrate clearly how they are meeting the strategy and how they will ensure that development will mitigate against any increase in recreational pressure on designated sites.</p>
4	Environment Strategy	Policy SP26	<p>Protection of Open Space</p> <p>Built development or change of use will not be permitted on areas of open space identified as part of Thanet's green infrastructure network (including Public Rights of Way) unless:</p> <ol style="list-style-type: none"> 1) It is for an open recreation or tourism uses and is of appropriate scale and design for its setting. Any related built development should be kept to the minimum necessary to support the open use, and be sensitively located. 2) There is an overriding need for development that outweighs the need to protect open space and cannot be located elsewhere, in which case provision of alternative open space of an equivalent size must be made elsewhere. <p>New development that is permitted by virtue of this policy should make a positive contribution to the area in terms of siting, design, scale and use of materials. Built development in any areas designated as Local Green Spaces will only be permitted if the proposal meets the exception criteria set out in the National Planning Policy Framework.</p>
4	Environment Strategy	Policy SP28	<p>Quality Development</p> <p>New development will be of a high quality inclusive design. Developers will be required to seek an independent Design Review for development proposals on sites with a prominent visual impact, or which are of national significance.</p>
4	Environment Strategy	Policy SP29	<p>Conservation and Enhancement of Thanet's Historic Environment</p> <p>The Council will support, value and have regard to the significance of Heritage Assets by:</p> <ol style="list-style-type: none"> 1) protecting the historic environment from inappropriate development, 2) encouraging new uses where they bring listed buildings back into use, encouraging their survival and maintenance without compromising the conservation of the building,

			<p>3) seeking the provision of appropriate research for all applications relating to the historic environment on key sites as identified through the Heritage Strategy,</p> <p>4) facilitating the review of Conservation Areas and the opportunities for new designations,</p> <p>5) recognising other local assets through Local Lists,</p> <p>6) offering help, advice and information about the historic environment by providing guidance to stakeholders, producing new guidance leaflets, reviewing existing guidance leaflets and promoting events which make the historic environment accessible to all,</p> <p>7) agreeing Article 4 Directions which will be introduced and reviewed as appropriate,</p> <p>8) supporting development that is of high quality design and supports sustainable development.</p> <p>All reviews and designations will be carried out in consultation with the public in order to bring a shared understanding of why asset and areas are being designated.</p>
4	Environment Strategy	Policy SP30	<p>Climate Change</p> <p>New development must take account of:</p> <ul style="list-style-type: none"> Adapting to climate change by minimising vulnerability, providing resilience to the impacts of climate change and complying with the Government's Zero Carbon Policy Mitigating against climate change by reducing emissions
5	Community Strategy	Policy SP32	<p>Community Infrastructure</p> <p>Development will only be permitted when provision is made to ensure delivery of relevant and sufficient community and utility infrastructure. Where appropriate, development will be expected to contribute to the provision of new, improved, upgraded or replacement infrastructure and facilities.</p>
6	Transport Strategy	Policy SP34	<p>Safe and Sustainable Travel</p> <p>The Council will work with developers, transport service providers, and the local community to manage travel demand, by promoting and facilitating walking, cycling and use of public transport as safe and convenient means of transport. Development applications will be expected to take account of the need to promote safe and sustainable travel. New developments must provide safe and attractive cycling and walking opportunities to reduce the need to travel by car.</p>
6	Transport Strategy	Policy SP35	<p>Accessible Location</p> <p>Development generating a significant number of trips will be expected to be located where a range of services are or will be conveniently accessible on foot, by cycle or public transport. The Council will seek to approve proposals to cluster or co-locate services at centres accessible to local communities by public transport and on foot.</p>

6	Transport Strategy	Policy SP36	<p>Transport Infrastructure</p> <p>Development proposals will be assessed in terms of the type and level of travel demand likely to be generated. Development will be permitted only at such time as proper provision is made to ensure delivery of relevant transport infrastructure. Where appropriate, development will be expected to contribute to the provision, extension or improvement, of walking and cycling routes and facilities and to highway improvements.</p> <p>Subject to individual assessments, schemes may be required to provide or contribute to:</p> <ul style="list-style-type: none"> • Capacity improvements/connections to the cycle network • Provision of pedestrian links with public transport routes/interchanges • Improvements to passenger waiting facilities • Facilities for display of approach time information at bus stops along identified quality bus corridors • Improvement and expansion of public transport services • Improvements to the road network in line with schemes identified through the Transport Strategy.
6	Transport Strategy	Policy SP39	<p>New Rail Station</p> <p>Planning permission will be granted for a new railway station at a suitable location on land west of Ramsgate alongside the existing railway line. Landwest of Cliffsend (shown on Map 15) is safeguarded for this purpose. Proposals will be required to specifically demonstrate all of the following:</p> <ol style="list-style-type: none"> 1) Satisfactory vehicular access arrangements from East Kent Access 2) Suitable level of car parking 3) Integration with wider public transport services 4) Mitigation of any noise impacts on sensitive receptors 5) Compatibility with the landscape character of its location 6) Located to minimise the loss of best and most versatile agricultural land
12	Green Infrastructure	Policy GI01	<p>Locally Designated Wildlife Sites</p> <p>Development which would have a detrimental impact on locally designated wildlife sites will not be permitted unless suitable mitigation can be provided either on or off site within Thanet. Exceptionally, where a strategic need for a proposed development is identified which outweighs the importance of the locally designated sites and cannot be located elsewhere, an equivalent area of habitat will be created elsewhere at a suitable location well related to other existing habitats. Wherever possible and appropriate, new developments will include measures to enhance and connect locally designated wildlife sites.</p>

12	Green Infrastructure	Policy GI03	<p>Protected Species and other Significant Species</p> <p>On sites where protected species or farmland birds may be present, the Council will require a Protected Species survey to be carried out alongside any development proposals. Any mitigation necessary should be carried out in line with Natural England's Standing Advice.</p>
12	Green Infrastructure	Policy GI06	<p>Landscaping and Green Infrastructure</p> <p>When a development proposal requires a design and access statement, it will include a landscape survey. The landscape survey should describe the current landscape features on the application site, and demonstrate how the proposed development will provide landscaping and green infrastructure to enhance the setting of the development, where possible and appropriate, to:</p> <ul style="list-style-type: none"> • Create an attractive environment for users and occupiers • Establish a sense of enclosure with hedges and trees • Soften hard building lines and the impact of new buildings • Provide screening from noise and sun • Create new wildlife corridors and stepping stones • Create new wildlife habitats and improve biodiversity <p>The Council will require to be satisfied that the developer has made adequate arrangements to ensure continued maintenance of landscaping, and may seek to secure arrangements for this purpose by entering into a planning agreement.</p>
13	Quality Development	Policy QD01	<p>General Design Principles</p> <p>The primary planning aim in all new development is to promote or reinforce the local character of the area and provide high quality and inclusive design and be sustainable in all other respects. Development must:</p> <ol style="list-style-type: none"> 1) Relate to the surrounding development, form and layout and strengthen links to the adjacent areas. 2) Be well designed, respect and enhance the character, context and identity of its location; particularly in scale, massing, rhythm and use of materials appropriate to the locality. 3) Be of a density, layout, scale, mass and design appropriate to the development itself and compatible with neighbouring buildings and spaces. 4) Incorporate a high degree of permeability for pedestrians and cyclists, consider access for public transport and provide safe and satisfactory means of pedestrian and vehicle access including provision for disabled access. 5) Improve people's quality of life by creating safe and accessible environments, and promoting public safety and security. Residential development on garden land will be permitted if it will make a positive visual contribution to the area, the intrinsic value of the site as an open space is not considered worthy of retention, and will not

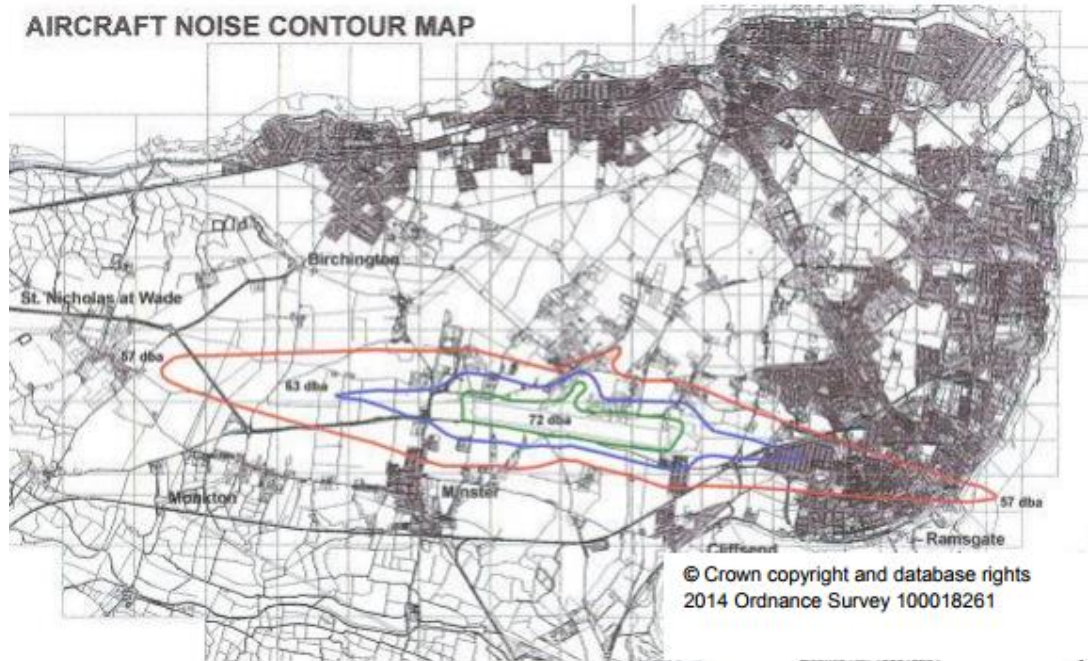
			<p>conflict with any other requirements of other design policies.</p> <p>External spaces, landscape, public realm, and boundary treatments must be designed as an integral part of new development proposals and coordinated with adjacent sites and phases. Development will be supported where it is demonstrated that:</p> <ol style="list-style-type: none"> 6) Existing features including trees, natural habitats, boundary treatments and historic street furniture and/or surfaces that positively contribute to the quality and character of an area are should be retained and protected where appropriate. 7) An integrated approach is taken to surface water management as part of the overall design. 8) A coordinated approach is taken to the design and siting of street furniture, boundary treatments, lighting, signage and public art. 9) Trees and other planting are incorporated, appropriate to both the scale of buildings and the space available.
13	Quality Development	Policy HE01	<p>Archaeology</p> <p>The Council will promote the identification, recording, protection and enhancement of archaeological sites, monuments and historic landscape features, and will seek to encourage and develop their educational, recreational and tourist potential through management and interpretation</p> <p>Developers should submit information with the planning application that allows an assessment of the impact of the proposal on the significance of the heritage asset. Where appropriate the Council may require the developer to provide additional information in the form of a desk-based or field assessment.</p> <p>Planning permission will be refused without adequate assessment of the archaeological implications of the proposal. Development proposals adversely affecting the integrity or setting of Scheduled Monuments or other heritage assets of comparable significance will normally be refused.</p> <p>Where the case for development which would affect an archaeological site is accepted by the Council, preservation in situ of archaeological remains will normally be sought. Where this is not possible or not justified, appropriate provision for investigation and recording will be required. The fieldwork should define:</p> <ol style="list-style-type: none"> (a) The character, significance, extent and condition of any archaeological deposits or structures within the application site; (b) The likely impact of the proposed development on these features; (c) The means of mitigating the effect of the proposed development. <p>Recording should be carried out by an appropriately qualified archaeologist or archaeological contractor and may take place in advance of and during development. No work shall take place until a specification for the archaeological work has been submitted and approved by the Council. Arrangements must also be in place for any necessary post-excavation assessment, analysis and publication of the results, and deposition of the archive in a suitable, accessible repository.</p>

		Policy HE03	<p>Local Heritage Assets</p> <p>The Council supports the retention of local heritage assets, including buildings, structures, features and gardens of local interest. Local Heritage assets will be identified in a Local List as part of the Heritage Strategy.</p> <p>Once adopted where permission is required, proposals will be permitted where they retain the significance, appearance, local distinctiveness, character or setting of a local heritage asset.</p>
15	Climate Change	Policy CC01	<p>Fluvial and Tidal Flooding</p> <p>The sequential test and exception test as set out in the NPPF will be applied to applications for development within identified flood risk areas. Development proposals in these areas will need a Flood Risk Assessment to be carried out by the developer.</p>
15	Climate Change	Policy CC02	<p>Surface Water Management</p> <p>New development will be expected to manage surface water resulting from the development using sustainable drainage systems (SUDS) wherever possible. SUDS design should be considered as an integral part of the masterplanning and design process for new development.</p> <p>Proposals for SUDS at sites within the Groundwater Source Protection Zone as shown on Map 19, or sites near the Groundwater Source Protection Zone, must demonstrate that the methods used will not cause detriment to the quality of the groundwater.</p> <p>Sites identified as a Tidally Sensitive Area (as identified in surface water management plans) will need to incorporate Sustainable Drainage Methods and a maintenance schedule where appropriate, at the design stage of a planning application, and a Flood Risk Assessment will be required before planning permission can be granted.</p>
15	Climate Change	Policy CC04	<p>Sustainable Design</p> <p>All new buildings and conversions of existing buildings must be designed to reduce emissions of greenhouse gases and function in a changing climate. All developments will be required to:</p> <ol style="list-style-type: none"> 1) achieve a high standard of energy efficiency in line with most recent government guidance; 2) make the best use of solar energy passive heating and cooling, natural light, natural ventilation and landscaping. All new buildings and conversions of existing buildings must be designed to use resources sustainably. This includes, but is not limited to: 3) re-using existing buildings and vacant floors wherever possible; 4) designing buildings flexibly from the outset to allow a wide variety of possible uses; 5) using sustainable materials wherever possible and making the most sustainable use of other materials; 6) minimising waste and promoting recycling, during both construction and occupation.

			New developments must provide safe and attractive cycling and walking opportunities to reduce the need to travel by car.
16	Safe and Healthy Environment	Policy SE01	<p>Potentially Polluting Development</p> <p>Development with potential to pollute will be permitted only where:</p> <ol style="list-style-type: none"> 1) Applicable statutory pollution controls and siting will effectively and adequately minimise impact upon land use and the environment including the effects on health, the natural environment or general amenity resulting from the release of pollutants to water, land or air or from noise, dust, vibration, light, odour or heat; and In determining individual proposals, regard will be paid to: 2) The economic and wider social need for the development; and 3) The visual impact of measure needed to comply with any statutory environmental quality standards or objectives. Permission for development which is sensitive to pollution will be permitted only if it is sufficiently separated from any existing or potential source of pollution as to reduce pollution impact upon health, the natural environment or general amenity to an acceptable level, and adequate safeguarding and mitigation on residential amenity.
		Policy SE03	<p>Contaminated Land</p> <p>Development proposals that would enable contaminated sites to be brought into beneficial use will normally be permitted, so long as the sites can be rendered suitable for the proposed end use in terms of the impact on human health, public safety and the environment, including underlying groundwater resources.</p> <p>Development on land known or suspected to be contaminated or likely to be adversely affected by such contamination will only be permitted where:</p> <ol style="list-style-type: none"> 1) An appropriate site investigation and assessment (agreed by the Council) has been carried out as part of the application to establish whether contamination is present and to identify any remedial measures necessary to ensure that the site is suitable for the proposed end use; 2) The proposed remedial measures would be acceptable in planning terms and would provide effective safeguards against contamination hazards during the development and subsequent occupation of the site. Planning conditions will be attached to any consent to ensure that remedial measures are fully implemented. In the case of sites where contamination is only considered to be a possible risk, a site investigation will be required by condition. Sites where contamination is believed to have been removed or where the full site history is unknown should not be able to be considered as contaminated land

		Policy SE04	<p>Groundwater Protection</p> <p>Proposals for development within the Groundwater Source Protection Zones identified on Map 19 will only be permitted if there is no risk of contamination to groundwater sources. If a risk is identified, development will only be permitted if adequate mitigation measures can be implemented.</p> <p>Proposals for Sustainable Drainage systems involving infiltration must be assessed and discussed with the Environment Agency to determine their suitability in terms of the impact of any drainage into the groundwater aquifer.</p>
		Policy SE05	<p>Air Quality</p> <p>All major development schemes should promote a shift to the use of sustainable low emission transport to minimise the impact of vehicle emissions on air quality, particularly within the designated Urban Air Quality Management Area. Development will be located where it is accessible to support the use of public transport, walking and cycling.</p> <p>Development proposals that might lead to a significant deterioration in air quality or an exceedence of air quality national objectives or to a worsening of air quality within the urban Air Quality Management Area will require the submission of an Air Quality Assessment, which should address:</p> <ol style="list-style-type: none"> 1) The cumulative effect of further emissions; 2) The proposed measures of mitigation through good design and offsetting measures that would prevent the National Air Quality Objectives being exceeded or reduce the extent of the air quality deterioration. These will be of particular importance within the urban AQMA, associated areas and areas of lower air quality. <p>Proposals that fail to demonstrate these will not be permitted.</p>
		Policy SE06	<p>Noise Pollution</p> <p>In areas where noise levels are relatively high, permission will be granted for noise-sensitive development only where adequate mitigation is provided, and the impact of the noise can be reduced to acceptable levels. Development proposals that generate significant levels of noise must be accompanied by a scheme to mitigate such effects, bearing in mind the nature of surrounding uses. Proposals that would have an unacceptable impact on noise-sensitive areas or uses will not be permitted.</p>
		Policy SE08	<p>Aircraft Noise</p> <p>Applications for noise sensitive development or redevelopment on sites likely to be affected by aircraft noise will be determined in relation to the latest accepted prediction of existing and foreseeable ground noise measurement of aircraft noise. Applications for residential development will be determined in accordance with the following noise exposure categories:</p>

Map 20 - Aircraft Noise Contour Map



Nec		Predicted aircraft noise levels (dbl aeq.0700-23.00)
A	<57	Noise will not be a determining factor
B	57-63	Noise will be taken into account in determining applications, and where appropriate, conditions will be imposed to ensure an adequate level of protection against noise.
C	63-72	Planning permission will not be granted except where the site lies within the confines of existing substantially built-up area. Exceptionally, where residential development is granted, conditions will be imposed to ensure an adequate level of protection against noise.
D	>72	Residential development will not be permitted.

		Policy SE09	<p>Aircraft Noise and Residential Development</p> <p>When planning consent is granted for residential development on any land expected to be subject to a level of aircraft noise of above 57db(a)**, such consent will be subject to provision of a specified level of insulation to achieve a minimum level of sound attenuation in accordance with the following criteria:</p> <table><tr><td>NEC</td><td colspan="2">Predicted Aircraft Minimum Noise Levels Attenuation required (dB(A) (frequency range 100-3150 Hz)</td></tr><tr><td>A</td><td><57</td><td>No attenuation measures required</td></tr><tr><td>B</td><td>57-63</td><td>20dB</td></tr><tr><td>C</td><td>63-72</td><td>30dB</td></tr></table> <p>** LAeq 57dB 07.00-23.00</p>	NEC	Predicted Aircraft Minimum Noise Levels Attenuation required (dB(A) (frequency range 100-3150 Hz)		A	<57	No attenuation measures required	B	57-63	20dB	C	63-72	30dB
NEC	Predicted Aircraft Minimum Noise Levels Attenuation required (dB(A) (frequency range 100-3150 Hz)														
A	<57	No attenuation measures required													
B	57-63	20dB													
C	63-72	30dB													
		Policy SE10	<p>Light Pollution</p> <p>Development proposals that include the provision of new outdoor lighting should be designed to minimise light glare, light trespass, spillage and sky glow in order to preserve residential amenity, the character of the surroundings and prevent disturbance to wildlife. A Landscape and Visual Impact Assessment will be required for proposed developments that fall in to the E1 category. Proposals that exceed the Institute of Lighting Professionals standards will not be permitted.</p>												
18	Transport	Policy TP01	<p>Transport Assessments and Travel Plans</p> <p>Development proposals which the Council considers would have significant transport implications shall be supported by a Transport Assessment and where applicable a Travel Plan. These should show how multi-modal access travel options will be achieved, and how transport infrastructure needs arising from the expected demand will be provided.</p>												
18	Transport	Policy TP02	<p>Walking</p> <p>New development will be expected to be designed so as to facilitate safe and convenient movement by pedestrians including people with limited mobility, elderly people and people with young children. The Council will seek to approve proposals to provide and enhance safe and convenient walking routes including specifically connection to and between public transport stops, railway stations, town centres, residential areas, schools and other public buildings.</p>												
18	Transport	Policy TP03	<p>Cycling</p> <p>The Council will seek the provision at the earliest opportunity of a network of cycle routes. Development that would prejudice the safety of existing or implementation of proposed cycle routes will not be permitted. New development will be expected to consider the need for the safety of cyclists and incorporate facilities for cyclists into the design of new and improved roads, junction improvements and traffic management proposals. Substantial development generating travel demand will be expected to provide convenient cycle parking and changing facilities. New residential development will be expected to provide secure facilities for the parking and storage of cycles.</p>												

18	Transport	Policy TP04	<p>Public Transport</p> <p>Development proposals will be expected to take account of the need to facilitate use of public transport. The Council will seek to approve proposals consisting of or incorporating:</p> <ol style="list-style-type: none"> 1) improvement of passenger and waiting facilities 2) measures to improve personal security 3) improved accessibility for people with mobility limitations 4) bus/rail interchange facilities 5) secure cycle storage
18	Transport	Policy TP06	<p>Car Parking</p> <p>Proposals for development will be expected to make satisfactory provision for the parking of vehicles. Suitable levels of provision will be considered in relation to individual proposals taking account of the type of development, location, accessibility, availability of opportunities for public transport, likely accumulation of car parking, design considerations and having regard to the guidance referred to below:</p> <ol style="list-style-type: none"> 1) In considering the level of parking provision in respect of proposals for residential development (use class C3), the Council will refer to the guidance provided in Kent Design Review: Interim Guidance Note 3 - Residential Parking. 2) In considering the level of parking provision in respect of proposals for other development, the Council will refer to the indicative guidance in Appendix E. <p>Where the level of provision implied in the above guidance would be detrimental to the character of a conservation area or adversely affect the setting of a listed building or ancient monument then a reduced level of provision may be accepted. Within the town centres of Margate, Ramsgate and Broadstairs (as defined on maps 27, 28 and 29) new development proposals will not be required or expected to provide onsite car parking spaces. Where feasible such proposals</p>
18	Transport	Policy TP08	<p>Freight and Service Delivery</p> <p>New development proposals will be expected to demonstrate adequate off street servicing.</p>

Proposed Revisions to the Local Plans (Preferred Options) (2017)			
2	Former Airport Site	Policy SP05	<p>Former Airport Site</p> <p>Land is allocated for a mixed use settlement at the site of the former Manston Airport as defined on the policies map. The site has the capacity to deliver at least 2,500 new dwellings, and up to 85,000sqm employment and leisure floorspace.</p> <p>The overarching principle of development of this settlement is the creation of a single sustainable settlement that can be easily served by public transport and with good, easily walkable access to central community services and other facilities.</p> <p>Contributions will be required to meet the following provisions and proposals will be judged and permitted only in accordance with a development brief and comprehensive masterplan for the whole site detailing:</p> <ul style="list-style-type: none"> • How the requirements of the Transport Strategy will be met including the upgrade of Manston Court Road and improvements to Spitfire junction. • The relationship to the Parkway Station and Ramsgate Port including a southern bypass of Manston village and a direct link from the site to the A299 roundabout linking with the southbound dual carriageway. • A travel plan to include a public transport strategy linking the site to existing services, demonstration of how the site links with and relates to neighbouring settlements; • Key routes for traffic-calming measures • Coherent phasing and evidence of deliverability • A business plan to demonstrate how the employment will be delivered, and how it will relate and link to Manston Business Park • The provision of a District Centre to meet the retail need of the development, fit within the retail hierarchy and serve the appropriate catchment, as well as provision of complementary uses such as community business space and leisure uses/recreational facilities. • Provision of community facilities as outlined in the Infrastructure delivery plan (IDP) including a primary school facility at 4 forms of entry, and a Doctors Surgery <p>A Landscape and Visual Impact Assessment to address</p> <ul style="list-style-type: none"> • the visual sensitivity of the site focussing on retention of open space and protecting wide open landscape and strategic views; • how new built development will be designed to minimise visual impact on the open landscape of the central island. Particular attention must be given to roofscape for the purposes of minimising the mass of the buildings at the skyline when viewed from the south.

			<ul style="list-style-type: none"> • Design and Heritage statements to include: • An appropriate landscaping scheme, to be designed and implemented as an integral part of the development. • Provision of 31.77 Ha open space in accordance with Table 7 as required by Policy GI04, and integrated green infrastructure to include walking, cycling and equestrian routes and facilities • A buffer between the development and Manston Village. Settlement separation between the villages of Manston, Minster, Cliffsend and Acol and Thanet Urban Area • Pre design archaeological assessment • Links to the sites heritage to support tourism in Thanet, including consideration of proposals that would permit a limited element of aviation use • Detail as to how the runway will be incorporated into the development scheme and what functions it will serve. • Provision of surface water management/sustainable drainage schemes that will not contaminate groundwater sources, and any proposed initiatives that will improve the condition of the groundwater <p>Development proposals must:</p> <ul style="list-style-type: none"> • Provide an appropriate mix of dwellings to meet the requirements of Policy SP18 • Provide affordable housing to meet the requirements of Policy SP19 (nb. Policy SP19 is being amended to request affordable housing for more than 10 units) • Provide one electric car charging point for every 10 parking spaces provided • Consider accommodating any self-build requirements included in the self-build register • Contribute towards the Strategic Access Management and Monitoring scheme to meet the requirements of SP25 • Include an assessment of the sites functionality as a roosting or feeding resource for the interest features of the Thanet Coast and Sandwich Bay SPA Protection Area, including areas within 400m of the development sites boundary, and provide mitigation where necessary • Retain existing boundary features where possible • Provide a connection to the sewerage system at the nearest point of adequate capacity, in collaboration with the service provider • Allow future access to the existing water supply infrastructure for maintenance and upsizing purposes • Provide for the installation of digital infrastructure • Provide a Statement of Social Impacts addressing any needs for community facilities identified in the Infrastructure Delivery Plan
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APPENDIX 6 : RPS EMPLOYMENT AND HOUSING LAND TECHNICAL REPORT (MARCH 2018)

Employment and Housing Land Technical Report

In respect of

Kent International Airport,
Manston

On behalf of

RiverOak Strategic Partners

RPS Ref: PA/JCG21463

March 2018

QUALITY MANAGEMENT

Prepared by:	Paul Aldridge
Authorised by:	Angela Schembri
Date:	March 2018
Project Number/Document Reference:	JCG21463

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1 INTRODUCTION

- 1.1 RPS has been commissioned by RiverOak Strategic Partners (RiverOak) to prepare a technical report on the employment implications of providing a dedicated air freight facility, which offers passengers, executive travel, and aircraft engineering services at Manston and the likely consequential scale of any additional housing provision that might be required to house airport related workers.
- 1.2 This report is one of a number of technical studies that provide the evidence base against which the proposals for Manston are being assessed and considered. The report is informed by work undertaken by others and therefore its findings should read in conjunction with the conclusions of these other studies.
- 1.3 In particular, this report draws upon the employment forecasts for the Airport set out within Azimuth Associates report entitled *‘The economic and social impacts of airport operations’* (Volume IV). Their report provides information relating to the general economic profile of the East Kent including Thanet and provides details of the number and types of jobs that will be created at Manston Airport.
- 1.4 The forecasting of airfreight and passenger movements has been conducted across a 20 year period from the anticipated grant of a Development Consent Order in 2019. Operation of the Airport is forecast to commence in 2020 (Year 1) with air freight movements beginning in 2021. Passenger services are anticipated to start in 2022. Construction of the final phase of development at the Airport would be complete by 2037 and the airport would reach its modelled operational capacity by 2039 (Year 20).
- 1.5 The facilities for air freight and cargo operations would be able to handle a minimum of 10,000 air freight traffic movements per year. This will include the construction of 65,500sqm cargo facilities. The Airport is expected to handle 96.5K tonnes of air freight in 2021 rising to 340.7k tonnes by 2039. Similarly, passenger numbers are expected to increase from 662,768 in 2022 to 1.4M by 2039 (Table 5, Forecast Job Creation, Azimuth Associates).
- 1.6 The strategic importance of the site is not dependant on the overspill role for the London and South East air passenger market. Accordingly, its potential effects are larger mutually exclusive of the operation of other airports within the South East.
- 1.7 This report has regard to a defined ~~Study Area~~ which most closely reflects the area from which Manston is expected to draw the majority of its forecast workforce. It is reasonable and logical to assume that any housing and employment effects would generally be felt more keenly closer to the airport. The study area used for the purposes of this report is examined fully below but in brief comprises the following districts; Thanet, Canterbury, Swale, Dover and Shepway.
- 1.8 RiverOak have commissioned related work which examines the socio-economic effects of Manston Airport which demonstrates that there will be a good spread of jobs with an emphasis on professional and managerial posts and unskilled work. The remit of this report however is on the overall employment and housing effects consequently this information is not reproduced here.

- 1.9 The method of converting the employment arising from Manston Airport to in-migrant workers to a potential housing requirement relies upon the basic proposition that the introduction of such a significant development and the associated opportunities it creates will have some impact in terms of reducing unemployment and commuting and increasing economic activity rates. Such a major proposal has clear potential to reduce the need to recruit people from outside the study area by stimulating the local economy in a positive and beneficial manner. In combination, these factors should translate into a lesser demand for new housing to support the forecast work force of the Airport.
- 1.10 There is also a specific opportunity to address identified areas of local deprivation within the study area where there are higher levels of unemployment and lower activity rates which do not reflect the study area as a whole. For example, there are opportunities to introduce specific initiatives to target high unemployment. Again, the effects of such initiatives are likely to be relatively small but potentially significant in relation to reducing the need to attract in-migrants.

Methodology

- 1.11 In order to assess the potential employment and housing implications of Manston Airport the following broad methodology has been adopted.
1. Definition of a study area within which most of Manston's workforce will be drawn
 2. Derivation of forecast direct, indirect and induced employment for Manston Airport
 3. Quantification of potential levels of in-migrants to the Study Area to take up airport related employment who will require housing
 4. Production of population household and employment forecasts for the Study Area based on a range of assumptions
 5. Assessment of historic and potential future land supply for the Study Area
 6. Comparison of demand and supply in the context of the overall Study Area

Study Area

- 1.12 In order to structure the assessment a study area has been defined. The local labour market and housing impact analysis is undertaken for the defined study area. The study area is the area within which most of the potential employees of the Airport would live.
- 1.13 In order to define the study area RPS has had regard to drive time and distance isochrones and also competing sources of major employment attraction. In particular, in defining the study area regard has been had to the following:
1. Kent County Council published data (based on 2011 census information) on Distance Travelled to Work reveals that 89% of people resident in Thanet travel 0-40km to work. The equivalent figure for the County of Kent is 88% (so comparable). It demonstrates that people are prepared to travel considerable distances for employment purposes.
 2. A modelled 40km distance from the airport which equates approximately to a 45min drive time area
 3. The East Kent Super Council is being promoted by Thanet, Canterbury, Dover and Shepway thereby creating a regionally significant area.
 4. The borough of Ashford has been excluded as Ashford performs quite differently to the coastal authorities in East Kent and with high speed connections to the west and London, employees are likely to be more persuaded to travel in that direction

- 1.14 The adopted study area includes the following five local authority areas:
- Thanet
 - Dover
 - Swale
 - Canterbury
 - Shepway
- 1.15 Where possible, parts of Shepway (Romney Marsh and New Romney areas) have been excluded to remove the potential overlap and duplication with comparable airport facilities at Lydd (Ashford) Airport.
- Airport Employment*
- 1.16 The proposed development at Manston Airport will give rise to additional (direct) employment and lead to further increased demand for labour in the local economy as a result of supply chain effects and the household spending of employees (indirect and induced employment).
- 1.17 The impact of increased airport related employment on local labour markets and on the need for housing are relevant issues for local authorities and other stakeholders in terms of planning, economic development and the provision of services. It is therefore appropriate to establish the possible scale and importance of these impacts in absolute and relative terms. In particular, the Airport may also result in some in-migration to the study area. In-migration will give rise to a direct requirement for additional housing.
- 1.18 Forecasts relating to the labour market and housing needs in this particular case involve dates that extend far into the future. Full capacity at the Airport is not expected to be reached until 2039. Many forecasts only extend until the early 2030s. Consequently this requires the extrapolation of the data to generate forecasts to 2039 which carries with it a number of uncertainties. Even so, this report is intended to present a broad picture of the potential employment and consequential housing effects that may arise from the Airport.
- 1.19 Both housing and employment land provision are key considerations for local authorities when preparing their forward plans. In addition, the prospective impact on labour demand needs to be put in context. It is important to establish the employment effects of Manston relative to other changes in the labour market. It may be that other changes dwarf the effects of Manston (so that the Manston effects can be regarded as being of minor importance) or alternatively that Manston impacts will be a material influence on net outcomes. Even so, it is fair to state that Manston represents a significant investment in the local economy, the scale of which is not replicated by any other current project.
- 1.20 Consideration of these issues requires an analysis of the following matters:
1. Manston Labour Demand Impact . analysis of the impact of Manston on labour demand in the study area

2. Labour Market Effects . analysis of the net impact on labour market in the area in terms of the balance between supply and demand in absolute terms and in the context of overall forecasts of future labour demand and labour supply in the study area
 3. The Impact on Housing Need . analysis of the effect on migration and thus on the number of houses required in the area
- 1.21 The impact (before mitigation) of Manston related employment on the balance of labour supply and demand in the study area will be affected by the local response to increased demand. There are a number of potential sources of additional labour from the projected workforce:
1. *Reduced unemployment* . the employment associated with Manston Airport might be met partly by reductions in the level of unemployment in the study area. It is very difficult to forecast potential levels and rates of unemployment in the local area up to 20 years into the future. Accordingly, this report analyses trends in the total level of unemployment in the study area and its characteristics. Using this analysis and information on total labour supply will inform a judgement on the potential scope to meet some of the additional Manston labour requirements from the pool of unemployed people. This aspect of ~~netting down~~gross employment is distinct from any initiatives by RiverOak and/or others to increase recruitment in the more deprived areas of the study area.
 2. *Enhanced economic activity rates*: the additional job opportunities could lead to an increase in activity rates in the study area. Analysis of current and past activity rates are undertaken to reach a judgement on the potential scope to meet some of the labour requirements from enhanced activity rates.
 3. *Commuter drawback/increased commuting*: the enhanced employment opportunities at Manston associated with the proposed development may lead to a reduction in commuting out of the study area. 2011 Census data will be examined and a judgement reached on the extent to which this could be reduced to provide further local recruitment to meet some of Manston's labour requirements.
- 1.22 Once these sources of potential labour have been examined, an estimate of the labour demand associated with the proposed development which could give rise to increased net in-migration is assessed.
- 1.23 The future position in the study area labour market is shown by analysis of labour demand and supply. The relative impact and significance of the employment associated with Manston Airport are then assessed.

Impacts on Housing Need

- 1.24 The net impact of Manston Airport on the need for additional housing is assessed by translating the projected impact of net labour demand into an impact on migration and thus on housing demand. The analysis allows for the extent to which people moving to the area in response to job opportunities created by Manston bring with them economically active partners/family members, (the number of migrant households will be less than the number of jobs filled by migrants). The report provides a direct assessment of the impact of increased labour demand on migration and thus on the formation of new households and housing demand in the study area.

Land Supply

- 1.25 The data utilised by this report to assess the availability and sufficiency of potential employment and housing land has been derived from various sources. RPS has examined the employment land reviews prepared by local authorities that inform their development plan preparation. For housing land supply the data is based principally on Strategic Housing Land Availability

Assessments (SHLAAs) but excluding sites that are deemed totally unsuitable as far as possible. In relation to employment land, local authority evidence base can vary significantly in terms of the adopted methodology and the frequency of update. In contrast, assessments of housing land availability tend to be more consistent having regard to the guidance laid down by government for preparing such assessments.

1.26 Whilst both sources have limitations, the data is intended to present a general perspective on the availability of employment and housing land within the adopted study area. There is no obvious source of significant additional land supply, particularly for housing, beyond current planning horizons. Other data has been derived from Kent County Council and forecasts of future employment for the study area have been sourced from Oxford EconomicsqEast of England Forecast Model (2014).

1.27 Whilst a view on the demand for both employment and housing land are fundamental to an assessment of the potential implications of meeting that demand, it is also important to relate it to an understanding of the land requirements for both uses and the issues associated with accommodating those requirements. In order to do this, this report examines how Manston Airport would principally impact on the town planning system in relation to the associated development implications (as compared with the planning of the Manston itself).

Past Development Rates

1.28 The starting point in this analysis is an assessment of past rates of new employment land take up and housing completions to establish the general levels of development that have occurred during the period when Manston was operational, taking into account the peaks and troughs in the historic economic cycle. Such analysis provides a general perspective and a reference point for looking forward.

Current Planning Horizons - the medium term

1.29 The assessment examines the levels of supply in the context of local authoritiesqcurrent and emerging forwards plans to identify how much provision is already %to the system+ and on the assumption that Manston Airport would begin operating again in 2020. It is accepted in this regard that proposed provision in emerging plans is subject to statutory processes and could change. With that qualification however, to the extent that draft figures represent the position of a local authority at a particular point in time and dependent on the stage of plan preparation, they represent a reasonable view of future supply to the end dates of plans. On this basis, it should be possible to establish an overall supply picture to the early to mid 2030s with a reasonable degree of certainty.

The Longer Term

1.30 For the mid to late 2030s, we review potential sources of supply based on the following main categories:-

- Any likely %overrun+in relation to major, strategic sites
- Continuing %windfall+ rates of development on previously unidentified sites and brown field land.

- Sites that have been previously actively considered but not taken forward.
 - Sites in Strategic Housing Land Availability Assessments (SHLAAs and similar exercise).
- 1.31 These potential sources are more speculative, as beyond 2031 there is no planning guidance currently in place, or likely to be in place for some time. In relation to the latter two categories (where there may be some overlap) the assessment must be qualified on the basis that decisions about suitability and timing in respect of any particular site or area would ultimately be a matter for local planning authorities to determine in future reviews of their development plans. The aim of this report is simply to give some overview of capacity.
- 1.32 This report sets the Manston related and study area demand side employment and housing outputs against the overall supply analysis and provides a commentary on the implications of the results.
- 1.33 The above commentary sets the context within and the methodology for assessing the effects of Manston Airport in terms of the forecast number of jobs and any consequential need for new housing to accommodate airport related workers over the period to 2039. Our detailed findings are set out in the remainder of this report which is organised as follows:
- Section 2: Labour Demand and Supply
 - Section 3: Housing
 - Section 4: Employment and Housing Land Availability
 - Section 5: Conclusions

2 LABOUR DEMAND AND SUPPLY

- 2.1 Manston Airport will give rise to (direct) employment and lead to increased demand for labour in the local economy as a result of supply chain effects (indirect employment) and the household spending of the wages and salaries of the additional direct and indirect employees (induced employment). It is therefore appropriate to establish the possible scale and importance of the impact of additional airport related employment to the local labour and housing markets in absolute and relative terms.
- 2.2 This section of the report provides an estimate of Manston related employment within the study area. The estimates of Manston related employment are based upon the assumption that Manston could capture a market of circa 222-340K freight tonnes between 2030 and 2039. Freight tonnage in the initial year of operation (2021) is expected to be circa 96.5K tonnes.
- 2.3 The forecasts of Manston related employment are then set in context by considering the potential future levels of labour supply and demand in the study area.
- 2.4 The labour market and Manston related employment forecasts in this assessment involve dates that extend far in to the future. The Airport is planned to commence operations from 2020 with the capacity of the Airport not being reached until around 2039. 2039 is beyond the forecasting period adopted by most models of employment and household growth including estimates prepared by Kent County Council and Oxford Economics referred to earlier.

Manston Related Employment

Definition

- 2.5 The development at Manston Airport will create specific employment opportunities in the local labour market in the following categories:
- *Direct employment:* people whose jobs are entirely related to and dependent on the operation of the airport. Direct employment is split into two categories . direct on-airport and direct off-airport. The distinction relates to the location of employment either within or outside the airport boundary.
 - *Indirect employment:* employment created by businesses located at the airport purchasing goods and services from suppliers in the study area who in turn may purchase further goods and services from local suppliers.
 - *Induced employment:* further employment in the study area supported by the expenditure of those whose incomes are derived directly or indirectly from the airport.
 - *Catalytic or 'attracted' employment:* wider economic benefits associated with the aviation sector. Air transport contributes to tourism and therefore impacts tourist spending in the economy. Air transport also impacts trade, facilitating the import and export of goods by air and therefore their manufacture and distribution as well as productivity.

- 2.6 The general approach to forecasting direct and indirect employment in the opening year and future years assumes that employment grows in line with air passenger and air freight growth of the Airport.
- 2.7 Further details regarding the methodology and assessment of future jobs related to airport operations at Manston are set out within Section 4 and 5 of Azimuth Associates report entitled *'The economic and social impacts of airport operations'*.
- 2.8 Forecasts of future employment related to Manston Airport are summarised in the table below according to modelled passenger numbers and freight tonnage:

Table 2.1: Estimates of Manston Airport Employment

Type of employment	Year				
	2020	2025	2030	2035	2039
Direct Jobs	116	2,466	2,870	3,595	4,271
Indirect/Induced Jobs	0	5,178	6,027	7,550	8,970
Total Jobs	116	7,644	8,897	11,145	13,241

Source: Volume IV, The economic and social impacts of airport operations, Table 5, Azimuth Associates 2018

- 2.9 As can be seen, total jobs (excluding catalytic jobs) is estimated to increase from 2,655 in 2020 (the commencement of operations) to 9,333 in 2030 and 13,241 by 2039.
- 2.10 The Azimuth Associates report also models revised forecasts of future employment in response to the results of consultations undertaken by RiverOak. These revised forecasts are summarised in the table below.

Table 2.1A: Revised Estimates of Manston Airport Employment

Type of employment	Year				
	2020	2025	2030	2035	2039
Direct Jobs	116	2,466	2,812	3,164	3,417
Indirect/Induced Jobs	0	4,438	5,062	5,695	6,151
Total Jobs	116	6,904	7,874	8,859	9,568

Source: Volume IV, The economic and social impacts of airport operations, Table 4, Azimuth Associates 2018

- 2.11 As can be seen, there is a potential reduction in employment of 3,673 by 2039 in terms of direct and indirect/induced jobs. This report tests the forecasts of employment set out in Table 2.1 but also provides commentary in relation to the revised forecasts of employment as presented in Table 2.1A.
- 2.12 In addition to the above jobs, there will be a number and range of jobs associated with the construction of the proposed development which are excluded from the above calculations.

Labour Supply and Demand in the Study Area

- 2.13 These forecasts of Manston related employment creation should be placed within the context of the study area labour market and the projected future level of labour supply and demand. The following paragraphs duly provide an overview of the key characteristics of the local labour force.

Labour Supply

- 2.14 Labour supply can be defined as the number of people in work or looking for work in the study area. It is dependent on the resident population of working age and the proportion of that population who wish to work (the economic activity rate). Forecasts of labour supply over a long period such as to 2039 are subject to high levels of uncertainty particularly around key variables such as future levels of migration and activity rates.
- 2.15 The actual labour supply available to employers in the study area will depend upon the number of local residents who wish or choose to work in the study area and the number of non-residents who commute into the area to work from surrounding districts and regions. Commuting patterns and the extent of any inflows and outflows will in part be influenced by the quality of local transport infrastructure including public transport services and number and frequency of connections.
- 2.16 Forecasts of population and labour supply for the study area have been derived from Kent County Council and cover the period to 2036. The population for 2039 has been projected forward by adopting the average annual projected increase for the preceding period.
- 2.17 Projections of population by age band are shown in Table 2.2 for the period 2017 to 2039 for the study area. The population of the study area is forecast to increase from 678,900 in 2017 to 775,000 by 2030 and to 823,420 by 2039. This represents an increase of 144,520 (21%) over the period 2017 to 2039. The majority of the increase in the population is in the over 65 age group which is forecast to increase by 94,740 between 2017 and 2039. The population of working age is forecast to increase by 233,360 (circa 8.2%) between 2017 and 2039.

Table 2.2: Population forecasts by Age for the Study Area 2017 – 2039

Age	Year					
	2017	2020	2025	2030	2035	2039
<16	121,300	126,000	131,500	133,400	135,800	137,720
16 - 64	409,200	415,300	432,400	438,600	440,800	442,560
65+	148,400	158,200	178,200	203,000	225,300	243,140
Total	678,900	699,500	742,100	775,000	801,900	823,420

KCC Population Forecasts, September 2017

- 2.18 The resident labour supply is also forecast to increase over the period 2017 to 2039. Modelling undertaken by Kent County Council indicates that the resident labour supply of the study area is forecast to increase from 322,700 in 2017 to 343,600 by 2025 and to 363,080 by 2039. The figure for 2039 has been calculated by reference to the average annual growth achieved in the preceding period. This is shown in Table 2.3 below. The resident labour supply is forecast to increase by 40,380 (circa 12.5%) over the period 2017 to 2039.

Table 2.3: Forecast Resident Labour Supply within the Study Area, 2017-2039

Year	2017	2020	2025	2030	2035	2039
Labour Supply	322,700	331,400	343,600	353,900	359,000	363,080

KCC Housing Led Forecasts

Labour Demand/Employment

- 2.19 Forecasts of employment for the study area have been obtained from Oxford Economics East of England Forecasting Model 2014 (updated January 2015). The county council does not have its own forecasts of employment but previously subscribed to the East of England model. Forecasts of future employment based upon the East of England model are set out within Table 2.4 below.

Table 2.4: Forecast of Employment within the Study Area (1000s)

District	1000's Employment per Year					
	2017	2020	2025	2030	2035	2039
Canterbury	76.9	79.5	83.3	87.2	91.1	94.2
Dover	39.8	40.7	41.6	42.5	43.3	43.9
Shepway	44.3	45.5	46.8	48.2	49.5	50.5
Swale	56.1	57.8	59.9	62.1	64.3	66.1
Thanet	50.3	51.3	52.1	53.0	53.9	54.6
Total Study Area	267.4	274.8	283.7	293.0	302.1	309.3

Oxford Economics East of England Forecast Model 2014

- 2.20 Employment in the study area is forecast to increase from 267,400 in 2017 to 293,000 in 2030 and to 309,300 by 2039. Again, the forecast for 2039 has been extrapolated from the average annual growth achieved in previous years as the East of England forecasts only extend to 2031.
- 2.21 Employment is forecast to increase by 41,900 (15.7%) between 2017 and 2039 within the study area.

Labour Market Position

- 2.22 The employment and resident labour supply forecasts for the study area are summarised in Table 2.5 below.

Table 2.5: Labour Market Balance within the Study Area (1000s)

Year	2017	2020	2025	2030	2035	2039
Labour Supply	322.7	331.4	343.6	353.9	359.0	363.0
Forecast Employment	267.4	274.8	283.7	293.0	302.1	309.3
Labour Market Balance	55.3	56.6	59.9	60.9	56.9	53.7

Tables 2.3 and 2.4 above

- 2.23 The study area is forecast to have an excess labour supply over demand throughout the period to 2039. This means that there are forecast to be more people working or looking for work in the study area than there are jobs available. We would expect such a situation to be reflected in some combination of increased unemployment and reduced net in-commuting (as people look elsewhere for employment). The implication of these forecasts is that the employment needs of the Airport should be able to be met by the projected pool of labour supply within the study area. Accordingly the new jobs associated with the operation of the Airport should contribute to an improved labour supply/demand balance.

Relative Impact of Manston Related Employment

- 2.24 The impact of Manston relative to the wider labour market operating within the study area can be assessed by comparing the level of employment associated with the Airport as a proportion of total employment in the study area.
- 2.25 By 2039 (year 20) total Manston related employment (13,241 . direct, indirect and induced) is forecast to account for just 4.3% of total forecast employment in the study area labour market.
- 2.26 It is of course accepted, however, that the effects will be greater closer to the airport having regard to the fact that a number of jobs will be aimed at local people.
- 2.27 The next section of this report examines the effect of employment at Manston Airport on the potential need for additional housing within the study area.

3 HOUSING

- 3.1 Manston Airport will give rise to increased demand for labour. The extent of that demand is described in the previous section of this report.
- 3.2 The additional labour demand could, in principle, result in in-migration to the study area which in turn could generate potential demand for additional housing.
- 3.3 This section of the report analyses the potential impact of the increased demand for labour associated with the Airport on the need for housing in the study area.

Manston Employment Resident in the Study Area

- 3.4 As evidenced by Table 2.1 in the previous section of this report, estimates of Manston related employment by direct, indirect and induced employment indicate a peak in 2039 of 13,241 employees over the study period.
- 3.5 Not all of the Manston related jobs located in the study area will be filled by residents of the study area. For example, some people will commute from further afield to access the range of employment opportunities that will be available.
- 3.6 In order to provide an estimate of the extent to which the employment supported by Manston will be taken up by residents living and working in the study area, the following assumptions have been made:
- Direct on-airport and off-airport employment: it is assumed that 95% of forecast direct on . airport and off-airport employment will be resident in the study area. This is considered to be a conservative estimate but nevertheless a robust assumption meaning that the need for additional housing to meet employment needs will be overstated.
 - Indirect and induced employment: It is assumed that 89.5% of forecast indirect and induced employment will be resident in the study area. This is based upon the proportion of people who live and work in the study area as a proportion of people working in the area (based upon Census information). This is considered to be a robust but conservative assumption.
- 3.7 Applying these assumptions (by component of employment) to the forecasts of employment described previously (Table 2.1) provides an assessment of the number of employees forecast to be resident in the study area (Table 3.1 below refers) over the period to 2039.

Table 3.1 Manston Related Employment in Study Area

Employment Type	Year		
	2030	2035	2039
Direct	2,727	3,415	4,057
Indirect & Induced	5,394	6,757	8,028
Total	8,121	10,172	12,085

- 3.8 The number of Manston related employees resident in the study area is forecast to increase from 8,121 in 2030 to 12,085 by 2039. The number of jobs created is in line with the overall assumptions relating to forecasts of air freight and passenger numbers.

Recruitment from Within the Study Area

- 3.9 Not all of this increased employment will be reflected in the balance between the projected labour supply and demand. It is possible that the increased demand will result in changes to the supply of labour, the potential effects of which have been previously described.
- 3.10 These potential impacts on the supply of labour are examined in further detail below.

Recruitment from the Unemployed

- 3.11 It is expected that Manston would provide significant opportunities for people who would be otherwise unemployed. The extent to which the employment opportunities can be taken up by unemployed people in the study area will depend upon the number and characteristics of the unemployed, the availability of training and the other employment opportunities available within the study area at any given time. Azimuth Associates report on *"The Economic and Social Impacts of Airport Operations"* describe the range of jobs anticipated to be provided by the Airport. Table 4 of the report provides a breakdown of the number of jobs by type in addition to which there will be a range of different skill levels required which should appeal to a wide spectrum of unemployed people.
- 3.12 It is not possible to forecast the number and characteristics of the unemployed in the assessment period, but the current and historical unemployment position provides guidance to aid the assessment of future rates of unemployment.
- 3.13 Table 3.2 below provides a summary of the unemployment rate in the study area by district for the period 2007 to 2018.

Table 3.2: Unemployment Rates by District for the Study Area

District	Year (%)											
	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
Canterbury	1.6	1.3	2.1	2.7	2.2	2.6	2.4	1.8	1.1	1.1	1.3	1.3
Dover	2.5	1.9	3.0	3.7	3.3	4.0	4.0	3.2	2.3	1.9	2.1	2.9
Shepway	2.9	2.2	3.3	4.2	3.9	4.3	4.3	3.3	2.4	2.1	2.1	2.3
Swale	2.5	2.0	3.2	4.0	3.6	4.2	4.1	3.2	2.2	2.1	2.2	2.3
Thanet	3.3	2.7	4.3	5.5	5.3	6.1	6.1	5.2	3.5	3.2	3.4	4.2
Kent	1.9	1.5	2.5	3.3	2.9	3.3	3.1	2.4	1.7	1.5	1.6	1.8

Source: KCC, Business Intelligence Statistical Bulletin February 2018. 2017 figure relates to January

- 3.14 As can be seen, there are significant variations between the various districts and over time including significant increases in unemployment during the global economic crisis (2009 - 2012).
- 3.15 Although not apparent in Table 3.2, there are also significant variations in the rate of unemployment by ward. The study area contains some of the highest concentrations of unemployment and deprivation within Kent and within the UK as a whole.

- 3.16 Given the relatively high unemployment rates within some of the districts (particularly within certain wards within Thanet and Dover) there will be potential scope to recruit a substantial number of the employees for Manston from the pool of unemployed workers.
- 3.17 The study area as a whole has an unemployment rate of 2.5% (10,360 persons). This compares to the average unemployment rate for Kent of 1.8% (at January 2018). It is reasonable for the study area to aspire to lower levels of unemployment over the study period to 2039.
- 3.18 If the unemployment rate were to fall so that it is more in line with the average for Kent, 2,950 employees would become available from the study area, which would supply a proportion (22% in 2039) of the overall demand for labour predicted at Manston Airport.

Recruitment from Increased Activity Rates

- 3.19 It can also be expected that the labour market demand caused by Manston would result in an increase in local activity rates. The availability of more local jobs has the potential to encourage more people to seek employment. This is the opposite of the so-called 'discouraged worker' effect in which the lack of employment opportunities causes people to give up seeking work.
- 3.20 Table 3.3 provides a summary of the activity rates (the proportion of the population which is both employed and unemployed, often referred to as the Labour Force Participation Rate) in the study area for the period 2007 to 2017.
- 3.21 The activity rate was between 73.7% (2013) to 78.7% (2009) in the study area throughout the period. The average activity rate achieved by the study area over the period 2007 to 2017 is 76.6%.

Table 3.3: Activity Rates (%) for the Study Area 2007 – 2017

2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017
76.8	78.1	78.0	77.4	77.6	75.7	73.7	75.4	76.3	76.6	77.0

Source: Annual Population Survey (ONS) . October to September data . Working Age 16-64

- 3.22 In comparison, the Kent average activity rate in September 2017 was 79%. The average activity rate of the study area is therefore currently 2% below that of the Kent average.
- 3.23 If productivity for the study area improved so that it more closely follows that of Kent as a whole, then by 2039 this would be equivalent to 8,851 employees representing approximately 67% of the overall demand for labour predicted at Manston Airport.

Reduced Out Commuting

- 3.24 The employment opportunities associated with the Airport will provide increased opportunities for people to change jobs. Some people who take up employment at the Airport may already reside within the study area but commute to jobs outside the study area.
- 3.25 There are significant outflows of residents living in the study area to employment locations within London (4,700), Ashford (9,539), Medway (6,697) and Maidstone (6,058).
- 3.26 The study area is part of a complex labour market with substantial commuter flows into and out of the area. According to the Census, in 2011, there were 87,117 people living in the study area

and commuting to work outside the area and 20,934 people working in the study area, but living outside the area. On this basis there is a net out-flow of over 66,183 people who live in the study area and work elsewhere.

- 3.27 The extent to which commuter drawback can provide a source of labour for Manston related employment will depend upon the current level of out commuting and the nature and number of jobs available.
- 3.28 We have assumed that the level of out-commuting could be reduced by 5% which would provide 3,309 employees throughout the forecast period to 2039.

Summary of Local Recruitment

- 3.29 Table 3.4 provides a summary of the potential level of local recruitment from within the study area. The effect of which will reduce the number of new homes required to support the forecast number of jobs associated with the Airport.

Table 3.4: Potential Local Recruitment from Study Area 2039

Reduced Unemployment	Increased Activity Rates	Commuter Drawback	Total Local Recruitment
2,950	8,851	3,309	15,110

- 3.30 By 2039, it is estimated (based upon the above assumptions) that 15,110 people could be recruited from the local area.
- 3.31 Table 2.3 identified that the labour force of study area is forecast by Kent County Council POPGROUP model to increase by about 9,180 between 2030 and 2039 based upon certain assumptions. Whilst the forecasts are not directly comparable the analysis undertaken above, it is nevertheless expected that Manston employment opportunities would be attractive to some of this natural increase in the workforce which would provide further potential for Manston to recruit its employment needs from within the study area without additional need for new housing to accommodate workers.
- 3.32 There is no basis on which to derive a forecast of Manston's future share of the additional labour force, but it is reasonable to expect that the natural increase in the labour force will be a further potential source of labour as this is predicted to occur irrespective of the proposals for Manston. The effect of Manston recruiting some additional employees from this natural increase in labour would reduce the level of additional Manston employment to be met from in-migration with an associated reduction in the number of additional Manston related households.

Potential In-Migration and Households

In-Migration

- 3.33 The forecast of Manston related employees resident in the study area must therefore be reduced by the potential level of local recruitment to derive the employment estimate which could be met through generated in-migration. The effect of this is shown in Table 3.5 below. No allowance has been made, however, for Manston taking a share of the natural increase in the labour force in the

study area. We have assumed that this increase in the labour force is entirely associated with non-Manston+ labour demand. Accordingly, the effects described below can be considered as maximum estimate of in-migrant airport workers attributable to Manston.

Table 3.5: Manston Related Employment to be met from Migration 2039

Forecast Manston related employees resident in study area (Table 3.1)	12,085
Local Recruitment (Table 3.4) reduction	15,110
Employment generated by in-migration	-3,025

- 3.34 As can be seen, the potential level of local recruitment from the study area is estimated at 15,110 in 2039. On the basis of the assumptions set out above, Manston is therefore forecast to require no in-migrant workers by 2039. Consequently there would be no additional households created and no requirement for the provision of new housing directly related to Manston Airport.

Conclusions – airport specific housing

- 3.35 In 2039, having regard to the above analysis and assumptions, the Airport will generate employment which requires no additional households (dwellings) within the study area. Accordingly, the proposals will have no effect in terms of the planned growth of new houses within the study area set out within local authority development plans.
- 3.36 If consideration is given to the lower levels of forecast employment (Table 2.1A) for the airport, then the same conclusions will be reached having reached to the assumptions set out in the preceding sections of this report, namely, there would be no effect in terms housing need.

“Catalytic” effects and housing pressures

- 3.37 The above conclusions relate to the direct, indirect and induced, employment arising from the proposed development at Manston and the housing implications flowing directly from the predicted levels of employment. The consideration of potential catalytic effects is excluded from the above analysis, but such effects are briefly explored below.
- 3.38 Catalytic effects are associated with the proposition that general growth can occur on the basis that employers that have no obvious association with the airport would nevertheless actively choose to locate close to the Airport as a result of its inherent economic significance.
- 3.39 Some employers may, for example, choose to locate near to an airport because of the access they offer to particular markets for example international markets. This, in turn, could lead to clustering of some activities. Other employment could then arise to specifically service this employment and so on.
- 3.40 Catalytic growth therefore presents both an opportunity and a potential challenge in planning terms.

- 3.41 Catalytic effects are distinct from those arising from employment that can be traced directly back to the operation of the Airport itself which is the basis for the forecasts in this document. The direct and indirect employment in these forecasts is specifically airport related whilst the induced element reflects the jobs that the direct and indirect work force creates through the purchase of the goods and services they obtain in the local economy.
- 3.42 One significant reason why catalytic effects are not part of the forecasts is that there is no single recognised method of calculating them because of the major problems associated with establishing any meaningful, measurable relationship between an airport, or any other similar large economic generator, and overarching growth.
- 3.43 Nevertheless, it would however be reasonable to conclude that the influence of the airport prior to its closure in May 2014 (up to that time) on the local economy, and including the implications for new housing, was already reflected in the overall employment population and household forecasts that were used to inform planning policy. Accordingly, the catalytic effects of the airport have to some degree already been built into to the planning process.
- 3.44 The preceding sections of this document that deal with household projections, employment forecasts and land supply, planned levels of house building are significantly below unconstrained projections. This is not at all surprising as the planning system does not, by definition, necessarily aim to fully meet unconstrained demand.
- 3.45 The extent to which such unconstrained demand might be accommodated in the future involves balancing a wide range of factors including the economic benefits and the environmental implications that will arise. This balancing exercise occurs principally in the context of the forward planning activities of local authorities.
- 3.46 In overall terms therefore, whilst the employment and housing provision put forward in this report can be regarded as necessary for the airport to function, the extent to which catalytic effects are allowed to express themselves is ultimately a matter for policy and the operation of the planning system.
- 3.47 It cannot be suggested that any unconstrained general growth pressures associated with airport would inevitably have to be accommodated even if a reliable assessment could be made as to what those pressures were. Put simply, the extent to which the wider economic benefits of Manston are allowed to manifest themselves in terms of jobs and homes and the land required to accommodate them is ultimately a matter of planning judgement and choice.
- 3.48 Overall, therefore, whilst the wider economic effects of Manston Airport could reasonably be expected to support the economy of the study area as well as regeneration objectives the management of these wider effects and the associated development pressures is most appropriately addressed in the context of the statutory planning system. Given the timescales involved there is ample time and opportunity to respond to the issues arising from Manston and its broader economic context in successive local plan reviews. This is consistent with the approach adopted in relation to similarly exercises that have been undertaken to consider other airport proposals.

4 EMPLOYMENT AND HOUSING LAND AVAILABILITY

Introduction

- 4.1 This section of the report provides estimates of current levels of employment and housing land supply within each of the local authority areas comprising the study area to enable comparisons to be made with potential future total demand for jobs and housing.
- 4.2 The assessment utilises existing information from the respective local authorities within the study area prepared predominately in support of development plan documents. This is considered to be the best available data in order to undertake this exercise. There are however differences in approach to calculating employment and housing need adopted by the various local authorities, including different assumptions regarding base and projection dates and overall methodology. Even so, the purpose of this section of the report is to present a broad picture of potential supply of housing and employment land within the study area.
- 4.3 In addition to individual local authority data, Kent County Council collates employment and housing land data published as a series of ~~±~~Housing Information Audits~~sq~~ and ~~£~~Commercial Information Audits~~sq~~. These Audits are informed by individual local authorities but benefit from the adoption of a common assessment methodology by the County thereby enabling direct comparisons between datasets. In relation to employment land, much of the County Council's data stems from the period 2014/2015, since when some local authorities have produced more up to date assessments of employment and housing land supply.
- 4.4 In addition, the data published by local authorities can be for different time series reflective of the plan period of their respective development plans. In general, most local authority data relating to housing and employment land runs to the period ending 2031.

Employment Land

- 4.5 Employment land supply is more dynamic than housing land principally because of greater variations in vacancy rates and the fact that the way that jobs relate to floorspace and land varies much more than for residential development across different geographical areas and also over time.
- 4.6 The way that the data is collected and monitored for employment land (B Class uses) and property also varies more than for housing which makes the task of aggregating the information for different local authority areas more difficult.
- 4.7 The picture presented in this section of the report is therefore indicative. Certain assumptions have had to be made in order to assimilate data regarding employment land across the various local authorities. Where data published by the County Council is more up to date than that published by individual local authorities, the County data has generally been used. Generally, where there are contrasting estimates of employment land, a conservative approach has been adopted.

- 4.8 In general, there is a tendency for available floorspace to be underestimated because vacant floorspace is not generally included within local authority information. In addition, there are complications relating to assessing mixed use developments which may include an element of Class B employment floorspace. Similarly, some employment floorspace is categorised as mixed, but the precise composition by type of employment activity is unknown. In such occurrences, RPS has had to make assumptions regarding the split of the floorspace.
- 4.9 Similarly, converting floorspace to a number of jobs is sensitive to small changes in the density ratio applied (i.e. floorspace to worker ratios) particularly for office and mixed-use development which make up a significant proportion of the total assessed supply.
- 4.10 For the purposes of this report, available employment land information has been categorised under five headings that generally correspond with most local authority assessments. These categories are:
- Offices (Use Class B1a, B1b)
 - Industrial (Use Class B1c, B2)
 - Warehousing (Use Class B8)
 - Mixed employment (Use Class B1 . B8)
 - Mixed B1 (Use Class B1)
- 4.11 Furthermore, the mixed employment category can sometimes include elements of retail, education, health and other uses. Whilst these comprise a range of employment generating uses, these are not typically considered employment uses (Class B uses) by planning policies set out within Local Plans. This section of the report is solely concerned with the supply of employment land for Class B uses.
- 4.12 In all cases, local authority information for the study area is expressed in terms of floorspace thereby removing the need to apply a conversion factor to land using applicable plot ratios by type of employment to calculate floorspace.
- 4.13 In terms of assessing possible job generation, the advice set out within the *Homes and Community Agency Employment Density Guide* (3rd Edition, November 2015) has been used. This provides a figure for the number of full-time equivalent jobs generated by the supply of employment floorspace. Different employment uses have different employment densities. The following densities have been adopted for the purposes of the calculations set out in this section of the report.
- Offices – 12sqm*
- 4.14 This is based on the general office category within the Guide. The Guide adopts densities ranging from 8sqm for call centres to 13sqm for corporate use. The Guide suggests that these categories should be based on Net Internal Area (NIA).
- Industry – 41sqm*

- 4.15 This is slightly less than the mid-point between the rates for Use Class B2 (36sqm) and B1(c) (47sqm) to reflect the fact that the Guide suggests that these categories should be based on Gross Internal Area (GIA) and Net Internal Area (NIA) respectively.

Warehousing – 82sqm

- 4.16 This reflects the mid-point between national distribution centres (95sqm) and final mile distribution centres (70sqm). On the basis that the amount of warehousing in the supply is relatively small and worker/floorspace ratios are high for this form of use, no adjustment is made to reflect net to gross.

Mixed employment B1 – 30sqm

- 4.17 This relates to the mid-point between B1(a) general office (12sqm) and B1(c) light industry (47sqm). Given there is no specific mixed category of employment provided within the Guide, no adjustment has been made in relation to a gross to net assumption.

Mixed Employment (B1-B8)

- 4.18 For employment floorspace categorised as mixed i.e. Class B1 – B8, an assumption has been made relating to an equal split in floorspace across the types of Class B use and then the employment densities described above have been separately applied and aggregated.
- 4.19 In relation to offices, the Guide suggests a reduction of 15% to 20% when converting from gross to net internal floorspace when applying employment densities. For the purposes of this exercise the total office space (B1a, B1b) has been reduced by 17.5% before applying a rate of 12sqm per full time equivalent job.
- 4.20 Table 4.1 below summarises the position in terms of employment land supply for the defined Study Area by local authority.
- 4.21 The figures set out in Table 4.1 have been sourced from employment land assessments prepared by each of the study area local authorities and/or from Kent County Council Commercial Information Audits. With the exception of Dover, most of these studies examine the employment land supply position for the period up to 2031. With respect to Shepway, the employment land supply relates to Folkestone, Hythe and the North Downs areas only (i.e. for the reasons previously explained we have excluded New Romney and Romney Marsh given the presence of Lydd Airport).

Table 4.1: Employment Land Supply within the Study Area to 2031 (sqm)

Local Authority	Offices (B1a, B1b)	Industrial (B2, B1c)	Warehousing (B8)	Mixed B1	Mixed B1 – B8	Total
Thanet	2,540	38,584	38,967	47,122	163,450	290,663
Dover	24,381	114,497	70,530	145,112	34,763	389,283
Canterbury	33,286	56,558	49,228	20,611	155,364	315,047
Swale	43,608	232,397	99,402	60,385	169,141	604,933
Shepway*	42,870	56,083	28,042			126,995
Total Study Area	146,685	498,111	286,169	273,230	522,718	1,726,921

Source: Local authority Employment Land Assessment 2010 . 2017 and Kent County Council Commercial Information Audits. * Shepway excludes Lydd/New Romney/Romney Marsh sub area. Assumes equal split between B1c, B2 and B8.

- 4.22 The above figures include various assumptions as per individual assessments undertaken by local authorities and the County Council (where applicable). Where employment floorspace supply by use class is not provided an assumption has been made regarding the split of uses to enable comparisons to be made and enable data to be presented in a consistent manner.
- 4.23 A number of local authorities are in the early stages of reviewing their local plans. In such cases, additional sites are in the process of being identified (in addition to those identified in the table above) whilst other sites may potentially fall away. For example, in relation to Swale, the recently adopted Local Plan allocates sites sufficient to deliver circa 500,000sqm Class B floorspace through site allocations set against a target of 130,000sqm over the plan period to 2031 meaning a potential surplus in supply of circa 370,000sqm Class B floorspace. Similarly, in other areas, for example Dover, the evidence base indicates the potential of four sites to accommodate an additional 97,000sqm Class B floorspace (excluded from data presented in the table above).
- 4.24 As previously indicated, some local authority employment land evidence includes reference to the contribution of vacant employment floorspace. Such floorspace has particular importance in relation to some local authority areas, for example, within Dover the former Pfizer premises at Sandwich (renamed Discover Park and granted Enterprise Zone status).
- 4.25 As local authorities move towards reviewing their local plan policies and the supporting evidence base including allocations for employment land the position will change. Table 4.1 is likely to present a conservative assessment of potential available employment land over the period to 2031 and beyond. Some sites will inevitably fall away whilst other sites may become available over time. Nevertheless, Table 4.1 provides a broad estimate of the level of potential supply in the period up to 2031. At that time Manston will have a workforce of 9,333 employees (direct, indirect and induced employment) representing 70% of the total number of jobs anticipated by 2039.
- 4.26 Table 4.1 indicates that the total Class B employment floorspace with the study Area comprises in excess of 1.72M sqm. Shepway has the least amount of projected available employment land (126,995sqm) however this figure only relates to part of the District excluding the New Romney area which has been excluded due to the presence of Lydd (London Ashford) Airport. Even so, the Council's Employment Land Review 2017 indicates there is sufficient supply to meet anticipated demand over the emerging development plan period to 2026.
- 4.27 It is clear from reviewing the employment land assessments that many of the local authorities within the study area have potentially significant surpluses of employment land which are judged as being more than sufficient to accommodate existing projected employment needs for the current and emerging plan periods.
- 4.28 Table 4.2 below converts the supply of employment (Class B) floorspace identified in Table 4.1 above into potential numbers of jobs generated having regard to the employment densities referred to earlier.
- 4.29 The employment land supply figures relate to gross floorspace and therefore it is necessary to convert these to a net floorspace figure (where applicable) in order to apply certain employment

densities. The Employment Density Guide indicates a range of between 15 . 20% for Class B1 offices. For the purposes of this exercise a mid-point of 17.5% has been applied. A similar conversion factor has been applied in respect to industrial and mixed B1 uses. No conversion is applied to warehousing. For Mixed B1 - B8 uses an assumption has been made regarding an equal split of this floorspace across the three use classes and then individual employment densities have been applied in order to provide an indication of the potential number of jobs created.

Table 4.2: Jobs from Land Supply by 2031

Local Authority	Offices (B1a, B1b)	Industrial (B2, B1c)	Warehousing (B8)	Mixed B1	Mixed B1 – B8	Total
Thanet	175	776	475	1,296	5,506	8,229
Dover	1,676	2,304	860	3,991	1,171	10,002
Canterbury	2,288	1,138	600	567	5,234	9,828
Swale	2,998	4,676	1,212	1,661	5,698	16,245
Shepway *	2,947	1,129	342			4,418
Total Study Area	10,085	10,023	3,490	7,514	17,610	48,721

*Excludes New Romney/Romney Marsh area

- 4.30 As can be seen, the supply of employment floorspace is potentially capable of providing around 49,000 jobs based upon the various assumptions outlined above. This compares to 9,333 employees at Manston. In 2031 Manston is equivalent to 19% of the total number of jobs potentially capable of being delivered by identified employment land within the study area. This indicates the significance of Manston as a major employer within the study area.
- 4.31 Each of the local authorities within the study area have prepared various studies which examine a requirement for employment land based upon the forecast number of jobs expected over the respective plan period. In the case of Dover and Shepway, the studies date from March and May 2017 and these are being used to inform the emerging development plans in terms of the need to allocate land for Class B employment purposes. In relation to the other authorities, the evidence base is more dated and stems from the period 2012-2013. In the case of Thanet, forecasts of future job creation were last undertaken by Experian Business Strategies in 2012. The Council is in the process of updating its employment evidence base to inform the emerging local plan.
- 4.32 Having regard to these studies, Table 4.3 below provides a summary of the range of forecast employment requirements for each authority over the period to 2031.

Table 4.3: Employment Requirements 2011 to 2031

Local Authority	Floorspace (Max) sqm	No. of Jobs (Max)
Canterbury	233,513	4160
Dover*	4,000	100
Shepway**	13,690	1,100
Swale	128,376	5385
Thanet	12,000	600
Total Study Area	391,579	11,345

* 2016-2037, ** 2016-2026 relates to entire District requirement

- 4.33 Comparing potential supply of employment land (floorspace, jobs etc - Table 4.1 and 4.2) to forecast demand for jobs (Table 4.3), it is apparent that the potential supply of employment land significantly exceeds the forecast requirement within the study area.
- 4.34 The forecast growth in the number of jobs over the period to 2031 (+11,345) is considerably below the potential of employment sites identified by employment land review documents (+48,721) by 37,376. Similarly, examining the position regarding floorspace (391,579sqm compared to 1,726,921sqm) demonstrates the sufficiency and potential significance of supply to meet forecast growth in terms of supporting the level of jobs predicted within the study area. In this respect it seems clear that even if development at Manston stimulates the wider economy of the study area there is a substantial amount of potential employment land that is capable of accommodating such requirements.
- 4.35 The forecasts of employment for the study area prepared by Oxford Economics as part of the East of England Forecasting Model indicate growth in employment of 41,900 over the period 2017 . 2039 and 25,600 jobs between 2017 and 2030. Similarly, the number of jobs is forecast to increase from 2011 to 2031 by 34,700.
- 4.36 In comparison, the assessment undertaken above in relation to the jobs potential of identified employment land for the study area for the period 2011 . 2031 is 48,721 jobs (Table 4.2 refers). This excludes part of Shepway. This indicates a healthy supply of employment land over the period at least until 2031. It is reasonable to assume that this surplus of land will not significantly deplete over the period to 2039 when the Airport is expected to reach operational maturity.
- 4.37 No attempt has been made to estimate how many years supply of employment land the totals in Table 4.1 above might represent. Attempting to look forward on the basis of future take-up rates is unrealistic on the basis of the information available.
- 4.38 Having identified the potential scale of surplus of employment land, the following paragraphs explore the position in relation to housing land availability.

Housing Land

- 4.39 Housing land supply is approached in a different manner to employment land. It is, in most respects, a simpler exercise than the exercise in relation to employment land because the operation of the housing market is less complex and less prone to variability except in relation to overall volume. Housing land assessments also tend to be undertaken in a more consistent manner by local authorities in accordance with guidance laid down by government for assessing housing needs within the development plan.
- 4.40 Furthermore, housing provision also tends to be more specifically projected in terms of overall housing targets to be achieved and associated annual house building rates. In this way a picture of how land supply relates to possible future scenarios for employment can be constructed.
- 4.41 Table 4.4 below summaries the housing land supply position as set out mainly within local authorities Strategic Housing Land Availability Assessments (SHLAAS).

- 4.42 The inclusion of sites within SHLAAs does not confirm their acceptability for housing in planning terms. SHLAAs focus upon site suitability and deliverability and therefore represent a potential supply of land rather than sites being committed.
- 4.43 Where relevant, sites that are deemed undeliverable or unsuitable have been omitted. No windfall estimates have been included. Similar to the employment land data, different assessment periods are utilised by the various local authorities comprising the study area.

Table 4.4 Housing Land Supply to 2031

Local Authority Area	No of Dwellings
Thanet	20,456
Dover	22,367
Canterbury	13,841
Swale	13,262
Shepway*	7,405
Study Area Total	77,331

* Excludes New Romney/Romney Marsh area - 2026

- 4.44 As can be seen, Table 4.4 indicates that the potential total supply of dwellings over the period to 2031 is 77,331 dwellings.
- 4.45 Table 4.5 shows the planned average annualised house building rates for local authorities in the study area in current and emerging local plans. Some of these figures have yet to be fully tested through the statutory development plan process and there are variations over the time periods in which they operate. However, they do enable an overall perspective to be obtained of planned house building rates for the study area.
- 4.46 For the study area, planned average annual rates comprise 3,479 dwellings per annum over the period to 2031. Using this rate of house building, the total supply of 77,331 dwellings (Table 4.3 above) in the study area would represent about 22 years supply.

Table 4.5: Planned House Building

Local Authority Area	No of Dwellings per annum
Thanet**	857
Dover	700
Canterbury	800
Swale	776
Shepway*	346
Study Area Total	3,479

*Shepway excludes New Romney/Romney Marsh/Lydd. Annual house building adjusted to reflect proportion of identified sites. **Based upon Local Plan Preferred Options Modification March 2017

- 4.47 Table 4.6 below provides details of the Housing Targets set by development plans for the delivery of new dwellings within each local authority area comprising the study area.

Table 4.6 Housing Target set by Development Plans

Local Authority Area	Housing Target set by Development Plan for Plan period 2031
Thanet*	17,140
Dover**	14,000
Canterbury	16,000
Swale	13,192
Shepway***	8,000
Study Area Total	68,332

*Based upon 2017 Local Plan Modification ** Dover relates to 2026 ***Shepway entire district

- 4.48 Different population and household projections have been obtained for the study area including a baseline (provided in the form of Household Projections prepared by DCLG, July 2016) and Kent County Council Housing Led Household Forecasts (September 2017). The forecast of the increase in the number of households for the study area for the period 2011 - 2039 is set out in Table 4.7 below.

Table 4.7: Projected Household Increase within the Study Area 2011-2039

Forecast	Year						2035-2039
	2011-2039	2011-2017	2017-2020	2020-2025	2025-2030	2030-2035	
DCLG unconstrained	88,172	19,658	10,196	16,870	17,325	16,336	7,787*
Kent CC (Housing Led Sept 2017)	81,617	10,500	9,100	21,400	18,100	16,200	6,317*
Planned Growth (Table 4.5)	97,412**	20,874	10,437	17,395	17,395	17,395	13,916

*extrapolated using growth from preceding years ** assumes rates of planned house building for period 2011-2039

- 4.49 As can be seen from Table 4.7, the planned rates of house building are very comparable to unconstrained household growth within the study area. The total unconstrained growth in the number of households over the period 2011-2039 for the study area is approximately 88,172. The potential supply in Table 4.4 (77,331 dwellings) represents 88% of this total.

Conclusions

- 4.50 In summary the broad picture emerging in relation to both employment and housing land supply is that there would appear to be sufficient land generally in the study area to be reasonably confident in relation to the period to 2031 in relation to current levels of planned growth.
- 4.51 The position is more favourable in relation to employment land on the basis of the way housing and employment land supply relate to the respective unconstrained, trend base projections. This general view does not account for what are likely to be local variations in supply and the different challenges that individual local planning authorities face in relation to environmental and other constraints.

- 4.52 For the period to 2031-2039 it would appear unlikely that additional land will be required for employment purposes. In contrast additional land for housing is likely to be required towards the end of this period.

5 CONCLUSIONS

- 5.1 Airport related employment within the study area is expected to reach a maximum of 13,241 jobs (direct, indirect and induced employment) by 2039 based upon assumptions relating to the predicted growth of air freight movements and passengers numbers
- 5.2 In comparison, the growth in the total number of jobs in the study area over the period 2017 to 2039 is forecast to be around 41,300. The Airport would therefore represent about 25% of the forecast growth in the number of jobs set against a potential excess of labour supply over demand by 2039 (+53,400).
- 5.3 The implication in purely quantitative terms is that the employment created by the Airport should be able to be met from the projected labour supply within the study area thereby contributing to an improved labour supply/demand balance. However, we recognise that there will be a range of reasons why Manston has the potential to attract people from outside the study area.
- 5.4 The amount of Manston related employment in the study area at 2039 is predicted as 12,085 employees having regard to the assumptions set out in this report. It is also plausible that increased demand will result in changes to the supply of labour for example in relation to recruitment from the unemployed, improvement in activity rates and a reduction in out commuting. Based upon conservative assumptions, such changes have the potential to provide a total of 15,110 employees by 2039, meaning that the potential for in-migration directly related to the employment opportunities associated with the Airport is -3,025 employees. This means there is no requirement for additional homes in the study area by 2039 to meet the forecast employment needs of the Airport.
- 5.5 In relation to the supply of land for employment and housing, the impact of Manston Airport will be limited based on the assumption that future growth in the study area post 2030 will continue within the range represented by the employment and household forecasts that have been used in this report. Planned growth would have to decrease significantly during the 2030s for the proportional impact of Manston to be significantly greater than that suggested in this report.
- 5.6 The general picture in relation to land supply is that, in crude terms, sustaining planned levels of growth to around 2031 in terms of housing and employment seems to be achievable. Beyond that point the situation becomes much less clear with obvious implications in relation to how and where growth should be accommodated. By 2031 the Airport will have reached approximately 70% of its employment capacity, with the remaining 30% of jobs (direct, indirect and induced) to be delivered over the period 2039.
- 5.7 As is often the case, and notwithstanding the significant problems with the relevant information, the situation in relation to employment land in the study area relates better to unconstrained growth than the equivalent picture for housing which tends to be more tightly controlled.
- 5.8 This report does not attempt to explore specific options for where growth beyond 2031 might be located. As will be clear from the above comments in relation to potential catalytic effects, given the timescales involved it is considered that there will be ample opportunity for the relevant local planning authorities to deal with the issues arising from Manston Airport and its associated

operational needs and is not likely to unduly affect the scope for local authorities to determine how future growth will be addressed.

- 5.9 Due to the nature of the labour market, employment growth will not require net additional housing, as residents are expected to fill the new jobs. Consequently, there is no need for new housing to support the new workforce.
- 5.10 The estimated generation of nearly 13,241 new jobs across the adjacent districts of Thanet, Swale, Dover, Shepway and Canterbury will help to build on the employment strengths and address the weaknesses of these areas. Our work concludes that there is sufficient housing available to meet the needs of new employees working at a reopened Manston.



