

Local Impact Report for proposed upgrade and re-opening of Manston Airport by Canterbury City Council

1. Terms of Reference

Introduction

1.1. This report comprises the Local Impact Report (LIR) of Canterbury City Council (CCC) as a neighbouring Local Authority to the proposed development.

1.2. The Local Authority have had regard to the purpose of LIRs as set out in s60(3) of the Planning Act 2008 (as amended), DCLG's Guidance for the examination of applications for development consent and the Planning Inspectorate's Advice Note One, Local Impact Reports, in preparing this LIR.

Scope

1.3. The LIR relates to the likely impacts of the proposed development on the administrative area of CCC.

1.4. Specifically, it describes the impact of Works 1 to 23 (as described in the Development Consent Order (DCO)), specifically:

- the construction of airside cargo facilities and ancillary offices with a maximum building height of 20m and total combined cargo and office footprint of 65,500m²;
- the construction of 8 light and business aircraft hangars and associated fixed base operator terminal with a maximum building height of 15m;
- the construction of a new air traffic control centre to include:
 - an air traffic control tower with a maximum building height of 27m;
 - an airfield operations centre; and,
 - associated parking;
- the construction of a new modern radar installation to include:
 - a radar tower;
 - an area of safeguarded land of 165m radius surrounded by a security fence to ensure uninterrupted radar operation; and;
 - single storey ancillary structures to house equipment and provide maintenance access;
- the construction of new or improved approach lights and navigational aids;
- the construction of new or improved approach lights and navigational aids; the rehabilitation of the existing 10/28 runway and runway shoulders;
- the construction and rehabilitation of pavements for the safe movement and parking of aircraft and aircraft support vehicles;
- the construction and rehabilitation of pavements for the creation of 19 Code E aircraft parking stands and associated pavement and infrastructure;
- the construction and rehabilitation of pavements for the creation of 3 Code C aircraft parking stands and associated pavement and infrastructure;
- the construction and rehabilitation of pavements for the creation of 4 Code C aircraft parking stands and associated pavement and infrastructure;
- the construction of a new passenger terminal facility with a maximum building height of 15m;

- the construction of a new airport fire station and associated storage areas to include:
 - six full size emergency bay doors allowing front and rear entry;
 - a garage area with associated workshop;
 - a welfare and management area; and,
 - a hardstanding area for tank storage of fire fighting materials;
- the construction of a gatehouse and vehicle control area to including vehicle lanes, a gantry and a welfare facility for gatehouse staff;
- the construction of commercial facilities (use class B1 and B8) with a maximum building height of 18m and with a total building footprint of up to 60,000m² including associated paved storage areas, parking and internal accessways;
- the construction of commercial facilities (use class B8) with a maximum building height of 18m and with a total building footprint of up to 26,000m² to include associated paved storage areas, parking and internal accessways;
- the construction of commercial facilities (use class B1) with a maximum building height of 10m and with a total building footprint of up to 30,000m² to include associated paved storage areas, parking and internal accessways;
- the construction of a new aircraft recycling facility and associated offices with a maximum building height of 23m;
- the construction of new or improved facilities to create an airport fuel farm on the site of an existing fuel storage facility;
- the construction of an airside storage and maintenance area for cargo and stand equipment;
- the construction of internal access roads and parking areas including passenger parking and parking overflow;
- the construction of paved areas and visual screening for the proposed cargo areas to include an emergency assembly area, site access road and paved areas to support cargo facilities and air traffic control; and,
- the construction of two new attenuation ponds for the purposes of treating, storing and discharging site drainage runoff.

1.5. The LIR does not describe the proposed development any further, relying on the applicant's description as set out in Volume 1 Chapter 3 of the applicant's Environmental Statement (ES) (Document Ref: TR020002/APP/5.2-1).

1.6. The applicant's ES provides a sufficient description of the development area.

1.7. Relevant planning history is referred to in Section 2 Part d) of the applicant's Planning Statement (Document Ref: TR020002/APP/7.2), the most recent being the following two applications that have been submitted to the local authority Thanet District Council for determination:

- **OL/TH/16/0550** - 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; and,

- **OT/TH/18/0660** - 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), 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), Site preparation and other associated works. The full/detailed element of the application comprises; change of use of retained existing buildings, and means of access.

Purpose and Structure of the LIR

1.8. The LIR's primary purpose is to identify the policies in the local development plan in so far as they are relevant to the proposed development and the extent to which the proposed development accords with these policies. It does this under topic-based headings (following the form of the headings used in the CCC's Section 56 response, reflecting the nature of the likely impacts of the proposed development. The key issues for the local authority and the local community are then identified, followed by a commentary on the extent to which the applicant addresses these issues by reference to the application documentation, including the DCO articles, requirements and obligations, as relevant.

1.9. Any points repeated from CCC's Section 56 response has been done to ensure that the Examining Authority and the Secretary of State are in no doubt of the local authority's' views. The LIR has sought not to duplicate material covered in the Statements of Common Ground (SoCG).

2. Description of the Area

2.1. Volume 1 Chapter 3 of the applicant's ES (Document Ref: TR020002/APP/5.2-1) and the applicant's Planning Statement and Design & Access Statement provide a sufficient description of the application site.

3. Statutory Development Plan

3.1. Section 38 (3)(b) of the Planning and Compulsory Purchase Act 2004 (as amended) describes the development plan as the development plan documents which have been adopted or approved in relation to that area.

3.2. The relevant documents that comprise the development plan are identified below. Other policy documents which might be considered as material considerations are also identified.

3.3 The **Canterbury District Local Plan** forms the development plan for the district and whilst adopted in July 2017, it is considered that the policies within it are in conformity with

the revised National Planning Policy Framework (NPPF) published in July 2018. This LIR will refer to the Canterbury District Local Plan when considering the relevant topic areas.

4. Assessment of Impacts and Adequacy of Response

Introduction

4.1. The following sections identify the relevant policies within the development plan and other local policy, the key issues raised by the proposed development and the extent to which the applicant addresses them and thus the proposal complies with policies in the local development plan.

Noise and Vibration

Canterbury District Local Plan

4.2 Policy DBE3 lists a number of design principles, including having regard to the impact of polluting elements, such as noise, dust, odour, light, vibration and air pollution from the development or neighbouring uses.

Key Local Issues

4.3 Impact of noise and vibration resulting from the operation of the airport on the amenity of residents in CCC's district, including Herne Bay and Whitstable and surrounding settlements. The proposed operation of the airport has the potential to result in noise and disturbance to residents living within the Canterbury District, including those in Herne Bay.

Adequacy of application/DCO

4.4 As part of their Environmental Statement, the applicant has provided an assessment of the potential noise and vibration effects that could arise as a result of the re-opening of the airport. In conjunction with Thanet District Council and Dover District Council, CCC has instructed Ricardo, an independent noise consultant, to review the assessment. In respect of CCC's district, Ricardo have raised the following matters:

- Review of the Environmental Statement identifies that Herne Bay is modelled as being located outside of the night time LOAEL contour of 40 dB, although part of the area of Herne Bay is located within the 80 dBLAS,Max contour. Although a 60 dB LASmax contour is not provided in the Environmental Statement, it is assumed all of Herne Bay is located within this contour. Clarification of the number of arrival night flights over Herne Bay and the number of potential awakenings is requested to enable a full assessment of the potential effects of the proposed development on CCC's district is required. The calculation of awakenings should also include the population of the areas overflown.
- Figure 12.12 and Figure 12.13 contained in the Environmental Statement present the N-above contours for 60 dB LASmax per night for the opening year and maximum capacity respectively. For the maximum capacity the 0-1 average number of events on a typical night contour (area where there is 0 - 1 event above 80 dB LASmax on a typical night) extends to Herne Bay and the 2-4 N-above contour extends into the the Council's administrative area. The 60 dB LASmax contour is not provided in the application and would have a large footprint area. Furthermore, the 60 dB LASmax contour used to inform the N-above 60 dB LASMax Figure and assessments appears

to be missing. It is therefore not possible to fully assess the potential effects of the proposed development on CCC's district.

- It is noted that the human ears response to maximum sound levels is better approximated by fast time-weighting rather than slow, though aircraft noise traditionally uses slow time weighting for assessment and certification purposes and was also used in a number of the sleep disturbance noise studies that have been used to develop the awakenings assessment. This approach may lead to a slight underestimation of potential effects.
- It is noted noise insulation is offered on the basis of LAeq,8hr at night and not on potential individual aircraft noise events or awakenings and so no properties in Herne Bay would qualify for noise insulation. Although there are no properties within the Council's district that would qualify for noise insulation either during the day or night, it is noted the Noise Mitigation Plan (NMP) does not include provision for ventilation for residential buildings within the grant and also does not cover the full cost of the insulation and as such cannot be assumed to avoid potential significant effects on health and quality of life, closer to the proposed development.
- It is noted that the Airport National Policy Statement states the government expects a ban on scheduled night flights of six and half hours between 23:00 and 07:00. It is considered that this ban on scheduled night flights of six and half hours between 23:00 and 07:00 should be included in the NMP and use of the quota count for non-scheduled (i.e. delayed departures and arrivals in the night period) flights. It is understood the monitoring regime will be developed further during the air space consultation.

4.5 CCC's Environmental Health team agree with the matters raised by Ricardo.

4.6 The proposed operation of the airport has the potential to result in noise and disturbance to residents living within the Canterbury District, including those in Herne Bay and Whitstable and surrounding settlements. For the reasons given above, CCC are unable to fully assess the potential noise impacts resulting from the operation of the airport on the amenity of its residents.

Transport and Highways

Canterbury District Local Plan

4.7 Policy T1 states that in considering the location of new development or the relocation of existing activities, CCC will always take account of the principles of the Transport Strategy, which anticipates that Manston Airport and surrounding sites will be the main generator of employment in Thanet. As stated in paragraph 4.2, policy DBE3 lists a number of design principles, including that the proposed development does not have a detrimental effect on the highway network in terms of congestion, road safety and air quality.

Key Local Issues

4.8 Impact of traffic generated during the operational phase of the proposed development on the local highways network within CCC's district.

Adequacy of application/DCO

4.9 CCC are relying on the expertise of Kent County Council (KCC) in assessing the likely impacts of the proposed development on the local highway network within its district and identifying necessary mitigation measures and KCC have confirmed that they will be submitting a Local Impact Report, which will cover this. Notwithstanding this, any significant traffic impacts resulting from the proposed development are expected to be localised in the main. As such, it is considered unlikely that the proposed development would have any significant traffic impacts that would instigate the need for mitigation in the Canterbury district. Notwithstanding this, CCC wish to raise the following matters:

- The transport modelling appears to be silent on the impact on CCC's district. The localised modelling is limited to junctions surrounding the airport only, while the work undertaken for Highways England does not address passenger, staff and HGV movements within the district. The latter shows a 10% increase in HGV movements on the M2 (J5-6), which they regard as not significant. However, this same traffic will be (a) navigating Brenley Corner (J7,) which we understand is at capacity, and (b) using the A299 through CCC's District. Consideration also needs to be given to the potential impacts of the Lower Thames Crossing. Given the absence of passenger and staff modelling for the CCC's District, it is unclear what the scale of the impact on the A28 to Canterbury will be either.
- KCC, in their Section 56 response as the Local Highway Authority, commented that "the approach to transport modelling within the Transport Statement is not considered to adequately assess future traffic conditions in line with expected growth patterns and infrastructure delivery". They also commented that "the trip generation and distribution methodology presented in the Transport Assessment are heavily based on assumptions which are not adequately justified or referenced to appropriate 'real world' examples...this limits the ability of the Local Highway Authority to comment on their validity with a sufficient degree of confidence to assess the appropriateness of the proposed highway mitigation strategy". The application does not appear to have addressed these matters raised by KCC.

Air Quality

Canterbury District Local Plan

4.10 As stated previously, policy DBE3 lists a number of design principles, including having regard to the impact of polluting elements, such as noise, dust, odour, light, vibration and air pollution from the development or neighbouring uses. Specifically in relation to air quality, policy QL11 states that development that could directly or indirectly result in material additional air pollutants and worsening levels of air quality within the area surrounding the development site or impact on the existing Air Quality Management Area will not be permitted unless acceptable measures to offset or mitigate any potential impacts have been agreed as part of the proposal. An air quality assessment will be required if the proposal is likely to have a significant effect taking account of the cumulative effects on individual sites. Policy QL12 then goes on to state that when granting planning permission for developments that could potentially result in pollution, CCC would impose conditions or seek agreements to ensure subsequent mitigation measures are undertaken.

Key Local Issues

4.11 Impact of proposed development on human receptors within CCC's district.

Adequacy of application/DCO

4.12 CCC's Environmental Health team have commented that the air quality assessment submitted with the application does not identify any human receptors within CCC's district and raise no objections to the application on air quality grounds.

Socio-economic

Canterbury District Local Plan

4.13 CCC recognises that the proposal to re-open the airport would make a positive contribution to the regeneration of the East Kent economy, as well as the UK's aviation economy, anticipating that in Thanet, the airport and surrounding sites will be the main generator of employment.

Key Local Issues

4.14 Whether the delivery of employment development at the airport complements the objectives of employment growth in CCC's district (including that committed in the Local Plan).

Adequacy of application/DCO

4.15 CCC's Policy and Property and Regeneration Teams generally concur with the socio-economic assessment submitted with the application, with reference to its overall conclusions regarding impact/significance.

4.16 Overall, CCC recognise the generally positive economic impacts for its district associated with the proposed development and so there is some potential for the local economy to benefit and exploit economic opportunities arising out of the proposed development.

Land Quality and Ecological/Biodiversity

Canterbury District Local Plan

4.17 Policy LB9 accords with the provisions of the Conservation of Habitats and Species Regulations 2010, which requires CCC to have regard for any potential impact that a development may have on protect habitats, plants, animals and birds. This policy also accords with the provisions of the Natural Environment and Rural Communities Act (2006), which states that 'Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions for the purpose of conserving biodiversity'.

4.18 Policy LB5 recognises that under the provisions of the Conservation of Habitats and Species Regulations 2010, CCC is required to have regard for any potential impact that a development may have on special areas designated to protect rare and important habitats, plants, animals and birds including European designated sites.

Key Local Issues

4.19 Impact of proposed development on biodiversity matters within CCC's district.

Adequacy of application/DCO

4.20 CCC are relying on the expertise of KCC and Natural England in assessing the likely ecological impacts of the proposed development on environmentally designated sites within its district and identifying necessary mitigation measures.

Visual Change in Landscape

Canterbury District Local Plan

4.21 Policy DBE3 lists a number of design principles, including the character, setting and context of the site and the way the development is integrated into the landscape, the form and density of the development (including the efficient use of land, layout, density, building heights, scale, massing, materials, finishing and architectural details) and the visual impact including the impact on local townscape character and landscape and the skyline.

Key Local Issues

4.22 Impact of visual change in landscape on character and appearance of CCC's district.

Adequacy of application/DCO

4.23 The Landscape and Visual Impact Assessment submitted with the application encompasses viewpoints within 5km of the application site boundary, none of which fall within CCC's district. CCC's district also falls outside of the Zone of Theoretical Visibility established within the application. The proposed development would result in a visual impact and change in landscape but given the separation distance, it is considered that this would not be significant in respect of CCC's district.

5. Conclusions

5.1 CCC have reviewed the application and evaluated the likely impacts of the proposed development in the context of the local development plan and other relevant policy and consider there are outstanding matters relating to noise and highways impacts.

5.2 The proposed operation of the airport has the potential to result in noise and disturbance to residents living within the Canterbury District, including those in Herne Bay and Whitstable and surrounding settlements. For the reasons given above, CCC are unable to fully assess the potential noise and vibration impacts on the amenity of its residents.

5.3 The information relating to transport modelling is considered inadequate to assess future traffic conditions. In addition, the capacity issues at Brenley Corner and the A299 have not been fully assessed.