



Thanet District Council

Local Impact Report

Application by Riveroak Strategic Partners to upgrade and reopen Manston Airport

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1 Terms of Reference

1.1 Introduction

1.1.1 This report comprises the Local Impact Report (LIR) of Thanet District Council (TDC). TDC has considered the purpose of the LIR as set out in Section 60(3) of the Planning Act 2008 (as amended), DCLG's Guidance for the examination of applications for development consent and PINS Advice Note One, Local Impact Reports, in preparing this LIR.

1.2 Purpose of the LIR

1.2.1 The LIR sets out the local knowledge and evidence on local issues that could be affected by the proposed development. As suggested in the PINS Advice Note One, the LIR should cover any topics which are relevant to the impact of the proposed development in their area. This document does not seek to replicate any assessments or reports that have been provided and due to be undertaken as part of the application process.

1.2.2 The LIR will provide a description of the site, details of the proposal, any relevant planning history and provide the relevant Development Plan policies before reviewing each topic the Council considers relevant to the proposed development.

1.2.3 Each topic will be considered against the policies of both the adopted Thanet Local Plan 2006 and the Draft Local Plan to 2031. The key issues relating to the topic are evaluated and determined and whether the impacts would be positive, negative or neutral. Finally, the draft Development Consent Order (dDCO) articles, requirements and obligations are reviewed to determine if they adequately address the local impacts identified.

1.2.4 The topics reviewed in this LIR are:

- Economic Impacts;
- Noise and Vibration;
- Air Quality;
- Land Quality and Contamination;
- Landscape and Visual Impact;
- Historic Environment;
- Traffic and Transportation;
- Biodiversity;
- Health and Well-Being;
- Major Accident and Disasters; and

- Cumulative Impacts

2 Site Description and Constraints

2.1 Introduction

- 2.1.1 The “Order Limits” as identified in this dDCO lie wholly within the administrative area of Thanet District Council. The Order limits are confined to the terrestrial environment. There are elements of the proposed development which are beyond the jurisdiction of TDC but local knowledge regarding the impact of the elements may exist.

2.2 Site Description

- 2.2.1 The dDCO site is located on the land occupied by the former Manston Airport. The Airport site is largely disused apart from the RAF Manston History Museum, Spitfire & Hurricane Museum and a cafeteria.
- 2.2.1 The site is adjacent to and in close proximity to a number of residential properties which are broadly located in the villages of Woodchurch, Manston and Cliffsend. There are a several clusters of the properties located adjacent to and in close proximity to the site along Spitfire Way, Manston Road, Manston Court Road, High Street, Canterbury Road West, King Arthur Road and Cliff View Road. Slightly further from the site are the villages of Minster and Monkton to the south west, Acol to the north west, Flete to the north and the town of Ramsgate and associated urban area to the east.
- 2.2.1 In addition to the residential uses, there are a number of industrial and commercial sites in the area around the site. These include leisure and tourism sites including holiday parks, hotels and a golf club mainly located to the west of the site. There are also several solar parks close to the site.
- 2.2.1 The airport site itself is approximately 1km from the Thanet Coast & Sandwich Bay Ramsar site and SPA, Thanet Coast SAC, the Sandwich Bay to Hacklinge Marshes SSSI and the Sandwich and Pegwell Bay National Nature Reserve. However, the outfall pipeline passes through/under land subject to these designations.
- 2.2.2 There are two Scheduled Ancient Monuments close to the site which are the Anglo-Saxon cemetery South of Ozengell Grange to the south east and Enclosure and ring ditches 200yds (180m) ENE of Minster Laundry located to the south of the site.
- 2.2.3 The site is within the Chalk Plateau landscape character type and the Manston Chalk Plateau Landscape Character Area. The site and surroundings are largely open in character, being generally flat. The area is defined by intensive farming and the openness is disrupted by the disused airport, Manston Business Park and sporadic settlements. Being a plateau it is elevated above the surrounding areas providing panoramic views to the south over Minster Marshes and across Pegwell Bay and, in the west, across the Wantsum. The elevated central chalk plateau also forms a skyline in many views back from lower landscapes in Thanet, including the coast and marshlands.
- 2.2.1 The main access to the site is via the A299, which is the main access route to the south of Thanet including Ramsgate, Broadstairs and Westwood. In addition it is the

main route to Discovery Park, Sandwich located to the south of the site in Dover District Council's administrative area.

2.3 Site History

- 2.3.1 The history of Manston Airport has been well documented in a series of reports and investigations about its prospects and is detailed in the Commercial Viability of Manston Airport Report (2016)¹.
- 2.3.2 It started life as a military airfield and played an important role during the Second World War. Whilst it continued as an Air Force base after the war, civilian operations were permitted. In 1998, the Ministry of Defence sold the site to the Wiggins Group plc, with a plan to expand the commercial operations, including investment in an airline (EU Jet) to provide passenger services. However, the airline ceased operations in July 2005 and the parent group (Planestation), went into administration.
- 2.3.3 The following month, Infratil Limited acquired Manston Airport from the administrators and sought to continue commercial air transport operations. However, without the support of a based airline, passenger numbers returned to the historically low levels experienced prior to EU Jet. In each year that Infratil Limited owned Manston it incurred losses of more than £3 million per annum and wrote off the purchase price of £17 million. Infratil disposed of the airport and associated liabilities in November 2013 for the notional price of £1.
- 2.3.4 Manston Skyport Limited completed its acquisition of the airport in December 2013, but in the face of continuing financial losses gave notice to staff in March 2014. The airport closed for operations on 15 May 2014. TDC then explored the possibility of using a Compulsory Purchase Order (CPO) to buy the airport, and then sell immediately onto a private sector investor willing to use the site as a commercial airport. A month-long search yielded a small number of interested parties but further scrutiny indicated that none provided the Council with sufficient confidence that it would be indemnified were it to exercise its CPO rights.
- 2.3.5 This led the Council to reach an initial conclusion in December 2014 that it was unable to find a CPO Indemnity partner. At the request of RiverOak Investment Corporation (one of the previously interested parties), in May 2015 it started a review of this decision and in October 2015 reached the same conclusion. Nonetheless, at the start of 2016, the Council launched a further search for a CPO Indemnity partner, but this again proved unsuccessful. In the meantime, the former airport site was sold in September 2014 to the current owners, Stone Hill Park Limited.
- 2.3.6 Since the Ministry of Defence sold Manston Airport in 1998, three separate private sector investors have attempted to develop the airport as a viable commercial undertaking. These ventures have all been unsuccessful and have incurred substantial losses in the process with the airport closing in May 2014. TDC has undertaken extensive exercises to find new investors prepared to re-open the airport but has failed to identify an appropriate party.

¹ [REDACTED]

2.3.7 One interested party, RiverOak Strategic Partners Limited (“RiverOak”), emerged from this process, and is now interested in acquiring the site and developing Manston Airport as a freight airport. RiverOak has been critical of previous owners, considering that they were not sufficiently active in seeking to develop and market Manston as a freight airport. In contrast, the current owner of the site, Stone Hill Park Limited (“Stone Hill Park”), has brought forward plans to develop the area for mixed residential, employment and leisure uses.

2.4 Planning History

2.4.1 Following the sale of the Airport by Ministry of Defence in 1998 the planning history below is from 1998 onwards.

Former Manston Airport

Application Reference	Address	Description	Decision (Date)
OL/TH/18/1213	Jentex Engineering Ltd Canterbury Road West RAMSGATE Kent CT12 5DU	Outline application for the erection of a 3 storey 61 unit extra-care facility, 14No single storey bungalows and 34No two storey dwellings and 8No Maisonettes including access and scale following removal of existing structures	Awaiting decision
OL/TH/18/0660	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), 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	Awaiting decision
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
F/TH/15/0457	Building 870, Manston Airport, Manston,	Change of use from airport use to general industrial use together with four storey extension and insertion of windows.	Refused (22 October 2015)

	Ramsgate, CT12 5b		Appeal Dismissed (13 July 2017)
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.	Not Determined Appeal Dismissed (13 July 2017)
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.	Not Determined Appeal Dismissed (13 July 2017)
F/TH/15/0458	Building 4, Manston airport, spitfire way, Manston, Ramsgate, CT12 5FF	Change of use from airport use to general industrial use.	Not Determined Appeal Dismissed (13 July 2017)
OL/TH/15/0020	Jentex Oil Depot Canterbury Road West RAMSGATE Kent CT12 5DU	Outline application for the erection of a block of 56no. extra care units, 56no. dwellings and community use building with retail unit, following demolition of existing buildings and structures, including access	Granted (17 September 2015)
F/TH/13/0943	Radar Transmitter And Receiver Building, Manston Road, Margate, CT9 4LT	Erection of a radar tower (10m in height) and equipment cabinet without compliance of condition 2 attached to planning permission reference number F/TH/13/0581 to site equipment cabinet adjacent to tower structure.	Granted (21 January 2014)
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	Planning permission not required (4 November 2013)
F/TH/13/0581	Radar Transmitter And Receiver Building, Manston Road, Margate, CT9 4LT	Erection of a radar tower (10m in height) and equipment cabinet	Granted (09 September 2013)
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 (02 February 2011)
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 (9 February 2005)
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 (19 June 2008)
F/TH/03/0515	London Manston airport, Manston, Kent,	Installation of CCTV system including 9no. 8 metre camera masts, in connection with airport operation.	Granted (4 July 2003)

	CT12 5BS		
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 realignment of the airport access road and formation of a new aircraft access to taxiway bravo.	Granted (15 January 2003)
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 (16 January 2002)
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 (4 December 2001)
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 a part of airport surface water management programme, together with 1.8m high security fence	Granted (2 October 2001)
F/TH/01/0654	London Manston airport, Manston, Kent	Provision of a new sub-station installation including standby generator.	Granted (10 October 2001)
F/TH/01/0467	London Manston airport, Manston, Kent	Installation of semi-automatic meteorological observing system.	Granted (17 August 2001)
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 (12 September 2001)
F/TH/00/0356	London Manston airport, Manston, Kent	Construction of glide path antenna and cabin and localiser aerial and cabin	Granted (14 June 2000)
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 (1 June 2000)
F/TH/99/0839	London Manston airport, Manston, Ken	Use of part of airfield apron for dismantling of 5 no. Commercial aircraft.	Granted (10 November 1999)
F/98/1063	Manston airport, Manston, Ramsgate	Development works to enable c.a.a. certification of airfield comprising: visual control room, 3 no. Portakabins, fire station extensions, antennae and cabins, perimeter security fencing, localiser aerial met masts and diesel fuel tank.	Granted (2 February 1999)

R.A.F Manston Museum

Application Reference	Address	Description	Decision (Date)
F/TH/13/0445	R.A.F Manston Museum, Manston Road, Minster, Ramsgate, CT12 5DF	Erection of two storey extension together with porch	Granted (1 August 2013)
DM/TH/11/1056	R.A.F Manston	Application for determination as to whether prior approval is	Prior Approval

	Museum, Manston Road, Minster, Ramsgate, CT12 5DF	required for demolition of external toilet block	is Not Required (29 February 2012)
CD/TH/99/0377	R.A.F. Manston History Museum, Manston, Thanet, Kent	Certificate of lawful development in respect of the use of crown owned airfield land and buildings for commercial civilian airport use.	Granted (8 July 1999)
F/TH/99/0260	R.A.F. Manston History Museum, Manston, Thanet, Kent	Change of use of land and buildings to RAF history museum, including the location of a fuselage for use as a cafe and shop and the erection of a 1.2m boundary fence and the short term retention of existing airfield generator plant.	Granted (9 August 1999)
F/TH/99/0058	R.A.F. Manston History Museum, Manston, Thanet, Kent	Enclosure of open yard to create additional internal display area.	Granted (18 March 1999)

Spitfire and Hurricane Museum

Application Reference	Address	Description	Decision (Date)
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 (2 June 2011)
F/TH/08/0176	Spitfire & Hurricane Memorial Building, Manston Road, Ramsgate	Retention of temporary portacabin for use in association with Memorial building	Granted (2 April 2008)
F/TH/01/0986	Spitfire And Hurricane Museum, Manston, Thanet, Kent.	Retention of temporary mobile building for use in association with memorial building.	Granted (29 November 2001)
F/TH/00/0230	Spitfire And Hurricane Museum, Manston, Thanet, Kent.	Single storey extension to food preparation area.	Granted (2 May 2000)

Former Fuel Depot

Application Reference	Address	Description	Decision (Date)
F/TH/14/1052	Former Fuel Depot, Spitfire Way, Manston, Ramsgate, CT12 5BU	Change of use of land to builder's merchants together with siting of portable building and storage container, formation of hard surface, and erection of boundary fence	Granted (22 January 2015)
F/TH/10/0758	Former Fuel Depot, Spitfire Way, Manston, Ramsgate, CT12 5BU	Change of use of land for the sale of sheds, fencing, decking, slabs and other associated materials; erection of prefabricated single storey building and erection of fence and gates	Granted (22 December 2010)
F/TH/06/0812	Former Fuel Depot (R/O 12 Bell Davies Drive), Junction Of Manston Road, Manston, Ramsgate	Change of use of land from fuel depot to use for car sales; erection of a building to provide MOT station and associated office; retention of covered storage area and open storage area.	Refused (8 April 2006)

2.5 National Planning Policy

Airports National Policy Statement

- 2.5.1 As stated in the Airports NPS, this document primarily relates to and has effect on the delivery of additional airport capacity through the provision of a Northwest

Runway at Heathrow Airport. It adds that 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.

- 2.5.2 However, the Secretary of State (SoS) must have regard to the contents of the Airport NPS which states it will be an important and relevant consideration in the determination of such an application for the development of airports, particularly where it relates to London and the South East of England.

National Planning Policy Framework (NPPF)

- 2.5.3 The Planning Act 2008 requires NSIPs to be determined in accordance with any relevant NPSs as well as any other matters that are considered important and relevant and this will include the NPPF, or parts thereof. The Airport NPS refers specifically to the NPPF and it is expected that the Applicant will have due regard to the NPPF where necessary.

2.6 Statutory Development Plan

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

- 2.6.2 For the purpose of this dDCO the development plan comprises the 'Saved' Policies of the Thanet District Local Plan 2006, which has been listed in Appendix 1. The Planning and Compulsory Purchase Act 2004 introduced measures that meant all the policies in the Thanet Local Plan 2006 would expire in June 2009 unless the Secretary of State extended the policies beyond that date. A Direction has been received from the Secretary of State and 93 of the policies in the 2006 Local Plan have been saved.

Draft Local Plan to 2031

- 2.6.3 TDC are currently in the process of preparing a new Local Plan. The Draft Local Plan to 2031 was submitted to the Secretary of State for Communities and Local Government on 30th October 2018, for independent examination.

- 2.6.4 The draft plan will now be subject to an Examination in Public, conducted by independent Inspectors, who have been appointed by the Planning Inspectorate.

- 2.6.5 The NPPF states that weight may be given to the relevant policies in emerging plans according to:

- a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
- b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and

- c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).

2.6.6 Therefore, as the draft Local Plan is at an advanced stage and likely to be adopted before the decision on whether to grant a dDCO, the policies in the Draft Local Plan are a material consideration when determining this application for a dDCO.

3 Summary of Proposed Development

3.1 Overview

- 3.1.1 The proposed development is seeking to reopen Manston Airport, which has been closed since 2014, with the intention to operate it as an air freight hub with associated business aviation and passenger services. It is proposed that 23,000 jobs within East Kent and the wider economy will be created by the airport's 20th year of operation.
- 3.1.2 The proposal to reopen Manston Airport is 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.
- 3.1.3 The vision for the airport is that it will provide 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.

3.2 The Proposed Development

- 3.2.1 The Proposed Development shall consist of the following principal components:
- Runways and taxiways suitable for the take-off and landing of a broad range of cargo aircraft;
 - An area for cargo freight operations able to handle at least 10,000 movements per year and associated infrastructure, including:
 - (a) A new Air Traffic Control (ATC) tower;
 - (b) A new fire station; and
 - (c) A new fuel farm.
 - Facilities for other airport related development, including:
 - (a) A new passenger terminal and associated facilities;
 - (b) An aircraft teardown and recycling facility;
 - (c) A flight training school;
 - (d) A base for at least one passenger carrier;
 - (e) A fixed base operation for executive travel; and
 - (f) Business facilities for airport related organisations.
- 3.2.2 The proposed development involves the following works to be undertaken:

- 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.

3.2.3 The works plans for the NSIP is listed in Schedule 1 of the draft dDCO.

3.3 Compulsory Purchase

3.3.1 It is acknowledged that the Applicant is seeking compulsory purchase powers for the acquisition of land and rights over land in order to construct, operate and maintain the proposed development. TDC has had regard to the Land Plans and Book of Reference submitted with the application. The applicant does not currently own the land which is subject to this application for a dDCO.

4 Assessment of Local Impacts

4.1 Principle of the Development

Thanet Local Plan 2006 'Saved' Policies

4.1.1 Policy EC2 - Kent International Airport - Proposals that would support the development, expansion and diversification of Kent International Airport will only be permitted subject to the following requirements:

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; and
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.

* Given the prime role of Kent International Airport in the strategy of this Plan, the District Council will carefully consider the potential adverse impacts of landscaping

and nature conservation enhancements in the vicinity of the airport, given, for example, the potential to increase the risk of bird strike.

- 4.1.2 Policy EC3 – Kent International Airport, Surface Transport Issues – For clarity, Policy EC3 was not a policy which was ‘saved’ by the SoS and no longer applies. However, surface transport issues will have a significant impact and will be mainly addressed by the Highways Authority and Highways England.
- 4.1.3 Policy EC4 - Airside Development Area - 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.
- 4.1.4 Policy EC5 - Land at, and East of, the Airport Terminal - 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.
- 4.1.5 Policy EC6 – Fire Training School/MoD Complex - This policy relates to land outside of the dDCO boundary and is not affected by the proposed development. Should the DCO be granted then the proposed development would have a positive effect on the land allocated as part of this policy as it supports the development of airport or airport-related uses that would assist in the expansion of the Airport.

Draft Thanet Local Plan to 2031 Policies

- 4.1.6 As detailed in section 2.6 the draft Local Plan has been submitted for Examination. Manston Airport has not been allocated for any proposed development in the Draft Local Plan.
- 4.1.1 Draft Local Plan paragraphs 1.38 – 1.45 explain the current status of the Manston Airport in context of the plan. A Commercial Viability Report was undertaken by Avia Solutions in relation to Manston Airport which concluded that the airport operations at Manston are very unlikely to be financially viable in the longer term, and almost certainly not possible in the period to 2031.
- 4.1.2 However, TDC recognises the proposed development being put forward by RiverOak and thus in order to not prejudice the dDCO process TDC did not allocate the Airport site.
- 4.1.3 In the event that a dDCO is not accepted or granted, or does not proceed, the Council will need to consider the best use for this site, in the next Local Plan review after a minimum of two years.

Key Local Issues

- 4.1.4 The adopted Thanet Local Plan 2006 allocates Manston Airport for aviation uses and airside development. The Draft Local Plan does not allocate Manston Airport

for any uses. TDC does not object to the development of the Manston Airport for aviation and has made significant efforts to support a functioning aviation use on the site.

Adequacy of Application/dDCO

4.1.5 The dDCO is generally adequate with respect to the description of the development which it proposes to authorise, except in relation to the following:

- TDC are concerned that the Applicant has not demonstrated a need for the proposed economic development uses to form part of the dDCO (see section 4.2); and
- There is a need for additional clarification in the proposed schedule of Works in relation to matters such as high mast lighting (see section 4.6).

4.2 Socio-Economic Impacts

Thanet Local Plan 2006 'Saved' Policies

4.2.1 Policy EC7 - Economic Development Infrastructure - To ensure that development opportunities are continued, where infrastructure and utilities have been provided to appropriate sites by the spatial development company, planning permission for new development likely to directly benefit from the provision of infrastructure will be permitted subject to a legal agreement (in accordance with section 106 of the town & country planning act; section 111 of the local government act; or any other appropriate provision) such that an appropriate level of payment is made to cover the cost of the provision of or improvement to service to the site.

Draft Thanet Local Plan to 2031 Policies

4.2.2 Policy SP02 - Economic Growth - A minimum of 5,000 additional jobs is planned for in Thanet to 2031.

The aim is to accommodate inward investment in job creating development, the establishment of new businesses and expansion and diversification of existing firms. Sufficient sites and premises suited to the needs of business are identified and safeguarded for such uses. Manston Business Park is the key location for advanced manufacturing and large-scale job creating development.

Land is identified and allocated to accommodate up to 53.5ha of employment space over the period to 2031. Land and premises considered suitable for continued and future employment use will be identified and protected for such purpose.

Thanet's town centres are priority areas for regeneration and employment generating development, including tourism and cultural diversification, will be encouraged.

The growth of the Port of Ramsgate is supported as a source of employment and as an attractor of inward investment.

New tourism development, which would extend or upgrade the range of tourist facilities particularly those that attract the staying visitor, increase the attraction of tourists to the area and extend the season, will be supported.

Development is supported that enhances the rural economy subject to protecting the character, quality and function of Thanet's rural settlements and natural environments.

Key Local Issues

- 4.2.3 The development has the potential to deliver significant positive socio-economic benefits to the local authority area. Given the Draft Local Plan Policy SP02 seeks to provide a minimum of 5,000 additional jobs over the plan period it is important that the predicted direct and indirect jobs arising from the proposed development are realistic, achievable and robustly assessed.
- 4.2.4 In addition, there is a need to understand the impact of the job creation both within and outside Thanet district in the local and regional economy. These job numbers continue to be generated on the basis of a theoretical academic report, rather than on a studied financial appraisal of the project and expected growth.
- 4.2.5 The proposed commercial development on the Northern Grass does not appear to be functionally required for operational purposes of the airport. A substantial portion of the Northern Grass is not considered to be previously developed land and any development here would be considered as development on a greenfield site in the countryside. The Council has an identified supply of allocated employment land within the district, such as the nearby Manston Business Park, which can accommodate commercial development.
- 4.2.6 The implications of the job creation purported from this project would significantly affect the OAN for housing within the East Kent region. The impact is a likely significant increase in housing requirements in Thanet. This may result in indirect effects, such as additional loss of countryside through increased housing developments and significant new infrastructure demands.
- 4.2.7 There should be a provision of on-site education/training facility with links to local providers. There is the potential for local employment and training during construction and operational phases which should be secured via appropriate obligations where possible.
- 4.2.8 There are likely to be impacts on tourism at the operational stage which will affect local amenity, businesses, the destination and the experience of visitors. Given that tourism is a significant aspect to the local economy in Thanet, it is important that tourists are not deterred from visiting the area both during construction and operational stages of the proposed development.
- 4.2.9 There are likely to be disruptions to local communities and amenity impacts on tourism during operation of the airport. All indicative flight paths would travel over Ramsgate, and night flight mitigation would not impact on the multiple flights during the day that could adversely affect local business, inward investment, the expanding filming industry and a successful tourism sector.
- 4.2.10 The proposed development is likely to lead to additional burdens on local services as it would result in the increase in residence of operational workers in the district.

In addition, the operational workers are likely to have a positive economic impact on the local economy.

- 4.2.11 The proposed DCO boundary includes part of Manston Green which is allocated in the draft Local Plan and has an extant planning permission for 785 dwellings. The permitted scheme makes allowance for the land required for Manston Airport landing lights and so does not appear to be adversely affected by the DCO.

Adequacy of Application/dDCO

- 4.2.12 There remains significant uncertainty about whether the socio-economic benefits from the proposed development, in terms of job creation, attract significant weight in support of the proposal, with these benefits potentially overstated in Section 13 of the ES. It is not considered that sufficient and convincing evidence has been provided to demonstrate the Applicant's claim that the effect on the economy of Thanet would be "major beneficial - significant" due to the limitations in the evidence produced.
- 4.2.13 Chapter 13 of the ES proposes a number of training opportunities at the construction and operation phases of the development and the use of local recruitment as benefits of the proposed development and additional mitigation measures. However, it is not clear how these would be secured by the dDCO. It is expected that a Section 106 agreement would be required in order to secure the benefits relating to training opportunities and local recruitment that has a direct benefit on the employment and the employability of the workforce in Thanet.
- 4.2.14 The proposed commercial development on the Northern Grass does not appear to be functionally required for operational purposes of the airport. This development could be situated on allocated employment land within the district, such as the adjacent Manston Business Park, where several development plots remain available. Work nos. 15-17 inclusive would allow the development of up to 116,000sqm of B1 and B8 general employment floorspace. However, there is no requirement in the dDCO for these aspects of the development to be airport-related and no evidence has been provided to show that these items are a necessary part of the proposed development. Therefore, the work would conflict with Policy EC4 of the Thanet Local Plan and these works could come forward without any of the other works.
- 4.2.15 The information provided in the Applicant's Updated NSIP Justification does not provide convincing evidence that this development should be treated as associated development within the meaning of the Act. There is existing space at the allocated Manston Business Park which could be used to office and storage space for operators and users of the airport and thereby supports its operation. No justification has been provided to explain why a further 116,000sqm of floorspace is a required to achieve this aim.
- 4.2.16 TDC is concerned that, as drafted, the dDCO may not be able to prevent only this general employment land being developed, without any other elements of the airport use coming forward.
- 4.2.17 Chapter 13 of the ES has provided clarification on the expected employment resulting from the proposed development. It is stated that by Year 20 that 23,235 jobs would have been created, of which 3,417 will be direct jobs. These direct jobs

are expected by the Applicant to increase quickly and steadily throughout that period, from 116 in year one, to 1,551 by year three.

- 4.2.18 The number of catalytic jobs at Year 20 stated in the Azimuth Associates report differs slightly from the figures stated in Chapter 13.² Moreover, the RPS: Employment and Housing Land Technical Report 2018 (EHLTR), appended to the Planning Statement, assesses the unrevised estimates of Manston Airport Employment which assumes the direct, indirect and induced jobs to be created at year 20 will be 13,241 some 3,673 greater than the revised estimates that are proposed in the ES. The EHLTR 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.
- 4.2.19 The EHLTR contains errors in its analysis of additional sites, including using out-of-date SHLAA information, identifying some sites already recommended for inclusion, double-counting of sites, assuming that all sites submitted are acceptable (ignoring obvious environmental constraints and the Council's sustainability appraisal), whilst the analysis of the potential economic growth in the plan period includes inaccuracies and a lack of understanding of the relationship between housing numbers and expected job growth.
- 4.2.20 There are issues regarding the defined study area in the EHLTR. Point 1 of paragraph 1.13 states that in defining the study area regard has been given to data published by Kent County Council (based on 2011 census information) on the Distance Travelled to Work revealing that 89% of Thanet residents travel 0-40km to work. The equivalent figure for the County of Kent is similar at 88%. The EHLTR states that this demonstrates that people are prepared to travel considerable distances for employment purposes. Whilst the report refers to KCC data it does not state the exact source of this data.
- 4.2.21 Consequently, according to the KCC area profiles that are also based on the 2011 census, the percentage of residents travelling 0-40km to work in Kent is 81.1%, 80.4% including Medway and 80.4% for Thanet. This is almost 10% below the figure quoted in the EHLTR.
- 4.2.22 Moreover, according to the area profiles provided on KCC's website 68% of residents in Kent travel 0-20km to work (67.9% for Kent and Medway) and 72.4% in Thanet. Therefore, only 13.1% of residents travel between 20km and 40km to work in Kent (12.6% Kent and Medway) and 9.2% in Thanet. This suggests that over two thirds of residents across Kent, Kent and Medway and Thanet only travel up to 20km to work.
- 4.2.23 Therefore, the inclusion of distances up to 40km would appear to skew the data and exaggerate the economic impacts. The 40km benchmark implies that almost half of Kent would be affected by Manston Airport given that Tunbridge Wells, Tonbridge, Sevenoaks, Dartford, Maidstone and the Medway Towns are all within 80km of Manston Airport.
- 4.2.24 It also unclear what type of jobs will be created as a result of the proposed development. If the majority of jobs are lower skilled and low paid jobs then people

² Azimuth Associates: Manston Airport: A National and Regional Aviation Asset - Volume IV, The economic and social impacts of airport operations (2017)

are less likely to travel beyond 20km as this may not be economically viable. There is also the assumption that the pool of unemployed workforce within the study area will have the necessary skills to for the jobs that will arise as a result of the proposed development. Given that the aviation industry is somewhat a niche industry it is unlikely that the skills required to perform a number of specialist aviation jobs will exist in the study area.

- 4.2.25 Point 2 of paragraph 1.13 states that a modelled 40km distance from the airport equates to approximately to a 45 minute drive. It is not clear whether this is within peak travel periods or a general daily average.
- 4.2.26 Point 3 of paragraph 1.13 refers to the East Kent Super Council which was to include Thanet, Canterbury, Dover and Shepway (now Folkestone and Hythe) but a decision was taken not to proceed with this proposal in 2017.
- 4.2.27 The study area includes the whole authorities of Thanet, Dover, Canterbury, Swale and Shepway and examines the all the authorities' housing and employment needs with the exception of the areas around Lydd Airport even though this is beyond the 40km assumed distance people are willing to travel to work. Based on the fact that over two thirds of residents only travel upto 20km to work this would exclude Swale and Shepway and part of Canterbury and Dover. Therefore, it is likely that the effects would be more pronounced in the authorities within 20km than those within 20-40km of the site. As only parts of some districts are within the 40km radius, it would be more representational to assess the wards of these districts that are within the 40km distance to work that people are prepared to travel.
- 4.2.28 It is noted that the areas of New Romney and Romney Marsh have been excluded from the study area because of their close proximity to Lydd Airport. However, Lydd Airport is due to be expanded following the granting of permission for increasing the capacity to 500,000 passengers per annum with a maximum of 40,000 aeroplane movements and 1,200 helicopter movements per annum and a 294m runway extension with a 150m starter extension capable of handling passenger flights by aircraft up to the size of Boeing 737 or Airbus 319.
- 4.2.29 The study area for Lydd Airport as defined in their ES overlaps with the study area of Manston Airport. Therefore, there may be some conflict regarding the socio-economic impacts associated between Manston Airport and the development permitted at Lydd Airport. Despite this potential issue, it appears that Lydd Airport has not been considered in the application or within the ES as a potential cumulative effect particularly for the socio-economic impacts.
- 4.2.30 Paragraph 2.16 states the forecasts of population and labour supply for the study area have been derived from KCC but no direct source has been provided so the findings are unable to be ratified.
- 4.2.31 The Consultation Report states that concerns were addressed in the Planning Statement regarding the implications of the job creation from this proposal would 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 in Thanet. This may result in indirect effects, such as additional loss of countryside through housing development and significant new infrastructure demands, which has not been assessed. However, contrary to this claim, the Planning Statement does not make reference to the OAN for housing and does not clearly assess this impact. Consequently, the ramifications for this on Thanet's countryside have not

been adequately assessed within the Applicant's submission (including within the socio-economic and landscape visual impact sections of the ES).

- 4.2.32 Chapter 13 of the ES has concluded that there will be positive effects on local businesses during construction and operational phases as a result of income generation from construction employees spend on accommodation and food, as well as potential income for local construction and supply companies, in turn providing employment opportunities. Chapter 13 of the ES assessed the predicted effects of disruption to the local road network during construction impacting on employee and customer access to local businesses as being of negligible significance. Furthermore, Chapter 13 also concludes there will not be any adverse effects on existing tourism and recreational activities.
- 4.2.33 The ES assesses the magnitude of change against the number of jobs created in the airport industry sector and not against the overall number of jobs in Thanet. Given that the airport has been closed for several years, the number of jobs in the airport industry sector in the area are minimal. Whilst re-opening the airport could create a significant number of jobs in the airport industry sector, this does not necessarily translate as a significant impact on the numbers of overall jobs locally or regionally.
- 4.2.34 For example, in year 20, based on assumptions, the proposed development represents approximately 71.1% of employee jobs in Airport Industry Sectors at the local level and concludes that this would be of major beneficial significance. However, when measured against the 41,000 jobs in Thanet, this only represents 8.3% of all jobs. It is queried whether this constitutes a major beneficial significance. Therefore, the magnitude of change for the number of jobs created needs to be reassessed against the total number of jobs to reflect the actual impact on employment. This could mean that the 8.3% positive change is no longer of major beneficial significance.
- 4.2.35 It is also unclear if jobs in the airport industry sector have more socio-economic benefits compared to other sectors, i.e. are wages higher in this industry than the national average. If it is proven that jobs in the airport sector generate significantly higher wages than the national average wage then there may be a case for only assessing airport industry sector jobs.
- 4.2.36 Whilst the Azimuth Associates report refers to the Cambridge model, it is not explicitly referred to in the ES. Therefore, it is not clear where the figures in paragraph 13.4.44 of the ES have been sourced from. It should be noted that the Thanet Cambridge Economic Impact Model 2015³ has now been superseded by the Thanet Cambridge Economic Impact Model 2017⁴ which was published in November 2018 and provides up-to-date figures on tourism.
- 4.2.37 The Council has now adopted a new employment land update and economic needs assessment: *Economic Development in Thanet* (July 2018) which supersedes the Experian report from 2012, which was not adopted, and updates the Employment Land Review (2010) and the Thanet Economic and Employment Assessment (2012).

³ [REDACTED]

⁴ [REDACTED]

- 4.2.38 The local, regional and national economy has now been defined in the ES and it is noted that the methodology used to forecast air freight traffic has been peer reviewed by Loughborough University and by the RiverOak consultancy team to address any optimism bias.

Conclusion

- 4.2.39 The proposed development is likely to lead to positive socio-economic benefits through job creation and the potential training of the local workforce and could assist the local economy in a deprived area. However, any benefits need to be weighed against the potential for loss of countryside both directly and indirectly from the proposed development. Moreover, the implications of increased employment opportunities may increase the demand for housing which may require the development of greenfield sites to meet this demand.

4.3 Noise and Vibration

Thanet Local Plan 2006 'Saved' Policies

- 4.3.1 Policy EC2 - Kent International Airport - Proposals that would support the development, expansion and diversification of Kent International Airport will only be permitted subject to the following requirements:

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;

- 4.3.2 Policy D1 – Design Principles –

- 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
 - (b) is compatible with neighbouring buildings and spaces through overlooking, noise or vibration, light pollution, overshadowing, loss of natural light, or sense of enclosure.

- 4.3.3 Policy EP7 – Aircraft Noise - 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.

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 (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.

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 dA(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.

- 4.3.4 Policy EP8 – Aircraft Noise and Residential Development - 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:

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

** laeq 57db 07.00-23.00

Draft Thanet Local Plan Policies

- 4.3.5 Policy QD03 – Living Conditions – All new Development should:

- 1) Be compatible with neighbouring buildings and spaces and not lead to the unacceptable living conditions through overlooking, noise or vibration, light pollution, overshadowing, loss of natural light or sense of enclosure.

- 4.3.6 Policy SE01 – Potentially Polluting Development - Development with potential to pollute will be permitted only where:

Development with potential to pollute will be permitted only where:

- 1) Applicable statutory pollution controls and siting will effectively and adequately minimise the impact upon existing and proposed land uses and the environment including the effects, including cumulative effects, on health, the natural environment such as significant natural and heritage assets, 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.
- 4) where there is an impact and the development is acceptable, a suitable mitigation is proposed to the satisfaction of the pollution control regimes.

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.

- 4.3.7 Policy SE06 – Noise Pollution – 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.

Key Local Issues

- 4.3.8 Noise impacts are key issues with all airports and this issue is one of the biggest concerns regarding this proposed development. To the east of the runway is the densely populated area of Ramsgate which would be the most affected residential area. The Noise Mitigation Plan states that the airport operator 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. This provides no certainty that the airport will operate in this manner. The areas to the west of the proposed development are sparsely populated and the impact of overflying residential areas is lower.
- 4.3.9 There are potential impacts resulting from night time flights leading to sleep disturbances and awakenings. Cargo operations are more likely to occur 24 hours a day to meet business needs and are have less operational limitations than passenger flights. Therefore, any night time flights will need to be robustly assessed and carefully monitored.
- 4.3.10 The airport site itself is approximately 1km from the Thanet Coast & Sandwich Bay Ramsar site and SPA, Thanet Coast SAC, the Sandwich Bay to Hacklinge Marshes SSSI and the Sandwich and Pegwell Bay National Nature Reserve, although the outfall corridor goes through/under all these designations. These designations are likely to be sensitive to noise and vibration and whilst they are within the 2km study area they have not been assessed in the noise assessment.
- 4.3.11 The proposed scheme does not mitigate the significant effects on schools, noise sensitive receptors and gardens and the ability of the mitigation proposed to remove significant effects has not been demonstrated in the ES. Consequently, the proposed development is not considered to fully accord with the requirements of the "saved" policies and the draft policies with regards to effects and suitable mitigation.

- 4.3.12 Subject to the DCO being approved any new developments will need to demonstrate that they have considered noise exposure from an operating Manston Airport to ensure that there are no significant effects from aircraft noise and should make reference to the Association of Noise Consultants document Professional Practice Guidance on Planning and Noise (ProPG) for good acoustic design of residential developments. For schools, guidance is available in Building Bulletin 93.
- 4.3.13 In the opening year, up to 115 residential dwellings are forecast to be exposed to significant annoyance and disturbance as a result of aircraft noise. In year 20, up to 225 residential dwellings are forecast to be exposed to significant annoyance, disturbance and sleep disturbance as a result of aircraft noise.
- 4.3.14 Night flights have been assessed in the ES and have the potential to cause additional awakenings but the ES considers the potential number of night flights is not considered to cause a significant effect through awakenings. There does not appear to be measures to minimise the effects of night flights and reduce the effects over time, rather than them just increasing in perpetuity, i.e. there is an implication that worsening effects is a consequence of growth.
- 4.3.15 Residential properties within the 63 dB LAeq,16hr noise contour will qualify for noise insulation under the proposed noise mitigation plan and TDC agrees that this noise level is appropriate. The noise insulation grant of £4,000 offered to freehold residents of affected properties may not be sufficient to cover the noise insulation (and ventilation). If there is little uptake of the noise insulation grant, the benefit of noise insulation and ventilation may not be in place and therefore it would not mitigate significant effects. Moreover, adverse effects would remain in external areas such as gardens in any case.
- 4.3.16 Significant effects are predicted at seven schools from a change in noise levels. Despite the significant effects no mitigation is proposed as the schools do not lie within the 63 dB LAeq,16hr contour for noise insulation. Kent County Council and TDC will need to take this into account for school developments and the outdoor educational curriculum.
- 4.3.17 Communities in Thanet that are likely to experience a perceived change in the quality of life for occupants of buildings or in amenity areas or open spaces include:
- Ramsgate;
 - Manston;
 - St Nicholas-at-Wade; and
 - Pegwell Bay.
- 4.3.18 The effect of the change in noise levels from aircraft noise has not been given in the ES and the significance of the effect on residential receptors is not given.
- 4.3.19 The construction may cause a potential significant effect from construction works at night required because of the operation of the runway. The potential significant effect can be avoided with works undertaken in a way to avoid the effect. TDC can control noise and vibration from construction through the Control of Pollution Act (COPA) 1974 and the applicant has committed to producing s.61 (of the COPA) applications for prior consent from TDC for the works.
- 4.3.20 The combined effects of the noise sources (aircraft, plant, construction and traffic) has not been assessed and as such the combined effect of the sources has not

been considered. Further information is proposed to be requested from the applicant in the form of overlapping construction noise levels and also the combined noise levels from the proposed development.

- 4.3.21 The flight paths used in the assessment are based on swathes which contain probable airspace routes, which will be formalised through an Airspace Change Proposal (ACP), which is a separate consenting regime. As such there is a potential for a degree of change to the routes and aircraft noise levels. The ACP proposal will also be subject to environmental assessment and consultation with TDC and others.
- 4.3.22 The ES as reviewed states in paragraph 3.3.1 that the “facilities for air freight and cargo operations would be able to handle in excess of 10,000 air freight movements per year...”. The ES goes on to state in Table 3.7 that by the 20th year of operation it is envisaged that there would be 17,170 total air freight air traffic movements (ATM) and states in Table 3.8 that by the 20th year of operation it is envisaged that there would be 9,298 total passenger flight ATMs. This would suggest an overall total of some 26,468 ATM. In Appendix 6.3 in Table 6.15 the ES sets out total number of movements by aircraft type, which includes an estimate of some 38,000 light aircraft ATMs associated with the proposed flight school and other light aircraft movements. This table indicates a total number of aircraft movements of some 64,468.
- 4.3.23 Appendix “Aircraft Noise Modelling” states “The number of aircraft operations have been obtained from the latest forecast of aircraft operations” but the numbers are not given in the Appendix. Paragraph 12.7.39 of the ES states there will be approximately 33 Air Transport Movements (ATMs) and approximately 16 non-ATMs on a busy day in all years. In Year 20 there is predicted to be 72 ATMs during a typical busy day and 7 ATMs on a typical busy night. Applying this busy day across the year would give 79 ATMs*365 days and give 28,835 ATMs. As stated above Chapter 3 Table 3.7 details 17,170 air freight ATMs and 9,298 passenger ATMs in Year 20, giving a total of 26,468 ATMs. The reason for this difference in ATM’s, along with details of the level of ATM’s adopted in the noise assessment is unclear as is the relationship between the level of ATM’s assessed in the ES and the theoretical capacity of 83,220 ATMs.
- 4.3.24 The applicant will need to provide clear details of the assumptions used in the aircraft noise modelling and a commitment not to exceed these limits or revise the findings of the assessments as otherwise there may be further significant effects than considered in the ES.
- 4.3.25 Caravans offer less noise reduction than conventional dwellings and cannot have noise insulation applied and so may require lower noise levels to avoid significant effects. The sensitivity of caravan parks does not appear to have been considered in the assessment of effects and as such further significant effects may emerge.
- 4.3.26 Local concerns have been raised about the previous monitoring work collected by TDC from the operation of the airport before its closure when compared to the information in the ES. The previous monitoring from Ramsgate shows the LA_{max}, SEL and LA_{eq,T} of individual aircraft noise events whereas the LA_{eq,16hr} noise levels reported in the ES are the 16hr average of noise levels and so provide a time average of noise levels over 16 hours. It is to be expected that individual noise events are higher than the time averaged level. Figure 12.8 of the ES shows Ramsgate to be within the 80 dB LAS_{Max} contour and so the measured individual

event aircraft noise levels and modelled individual event aircraft noise levels appear to be correlated.

Adequacy of Application/dDCO

- 4.3.27 The DCO application appears allow for a much greater theoretical capacity than has been assessed for the ES. It would therefore appear appropriate to place a limit on the number of flights so that the development would be in accordance with the findings of the ES.
- 4.3.28 The DCO application has articles for the development to be in accordance with CEMP, OEMP and NMP but these documents are not finalised (or produced in the case of the OEMP) and therefore TDC should be consulted on the content of these documents and be the approving body.
- 4.3.29 The scope of the ES has not included assessment of the combined effects of construction activities or the combined effects of construction and operation.
- 4.3.30 The methodology of the assessment does not include:
- significant effects from changes in noise levels at residential receptors.
 - clarity in the awakenings assessment for awakenings across the population overflown.
 - consideration of receptors on caravan park sites.
- 4.3.31 The assessment presented in Chapter 12 of the ES shows worsening of the night time effects over time though this is not explicitly stated in the Non-Technical Summary of the ES.
- 4.3.32 The following points are noted with regard to the assessment:
- The assessment of aircraft noise is based on 72 ATMs during the day and 7 ATMs during the night, in year 20. This is well below the theoretical capacity of the airport.
 - The noise insulation scheme does not appear to avoid significant effects.
 - The night flight assessment considers 1 flight per hour. If the frequency or number of flights is greater the effect may be greater.
 - The “Review of Potential Aircraft Noise Abatement Operational Procedures” document which defines the feasibility of potential abatement procedures was not presented in the application and has been requested to be supplied.
 - There is a preference to use Runway 28 for take-offs and Runway 10 for landings and whilst the Applicant will ‘seek’ to operate the airport in this way, there is currently nothing to prevent the airport from being operated in a different manner. This could mean that Runway 10 could be used for take-offs and Runway 28 for landings so that aircrafts will overfly Ramsgate causing adverse noises impacts to the residential areas.
 - There are some concerns associated with the lack of detailed definition of the airspace design and therefore lack of certainty over the effects from

airborne aircraft noise. The airspace design is subject to authorisation from the CAA and is therefore subject to change which could affect the proposed impacts either positively or negatively.

- The ES appears to scope out 'Quiet Areas' on the basis that it is "understood that there are no areas within the study area that would be referred to in the NPPF as being prized for their recreational and amenity value". Clarity is sought on where this understanding comes from. Figure 11.38 indicates that there are many areas at the more tranquil end of the tranquillity spectrum (as defined by the Campaign to Protect Rural England).
- the 2km study area for noise also includes the international and national environmental designations around Pegwell Bay. These areas tend to be quiet areas as noise causes adverse impacts upon the fauna for which they are often designated for. Therefore, whilst it is recognised that 'Quiet' is not the only determinant of tranquillity, clarity should be sought on how these areas are being considered in the assessment and where the understanding that there are no quiet areas is derived from.

4.3.33 There are concerns around the adequacy of the Noise Mitigation Plan (NMP), in particular in relation to a demonstration of how the aims of noise policy are addressed through mitigation. As it stands it is considered that the NMP does not mitigate significant effects and the effects are shown in the ES to worsen with time.

4.3.34 The following recommendations are made:

- Assessment and consideration of combined construction activity and combined construction and operational sources.
- Inclusion of the assumptions used in the ES to be part of the Register of Environmental Actions and Commitments such as the ATMs to be limited to the number in the modelling and adherence to these registered items being required.
- Inclusion of requirement of consultation with TDC on the Noise Mitigation Plan, Construction Environmental Management Plan, Operational Environment Management Plan and Register and TDC's approval of these documents.
- The Noise Mitigation Plan needs to be updated to consider measures to minimise the effects of night flights and reduce effects over time.
- The Noise Mitigation Plan needs to be updated with a revised noise insulation scheme with consideration of uptake of the scheme to avoid significant effects and a consideration of heritage assets and Caravan Parks.
- Clarification of awakenings effects across the population of the areas overflown by aircraft at night.
- A non-technical version of the Noise Mitigation Plan to be provided for lay readers.

- A figure to be produced showing the aircraft noise contours for the 63 dB (residential) and 60 dB LAeq,16hr contours for noise insulation eligibility.
- Location of designated engine test area to be shown and mitigation for test area to be considered.
- Update of the Non-Technical Summary to reflect changes in the ES and the comments made in this LIR.
- Limit of ATMs to be explicitly set out in the dDCO requirements.
- Night limit of ATMs to be explicitly set out in the dDCO requirements.

Conclusion

- 4.3.35 The proposed development at Manston Airport is shown to cause significant effects to residential, school and community receptors from daytime and night time noise levels. The proposed development will lead to significant noise effects that worsen with time and may not be adequately mitigated.
- 4.3.36 TDC has powers to control the noise effect of construction through the COPA and articles in Schedule 2 of the draft DCO providing for the development of a NMP, CEMP, OEMP and Register of Environmental Actions and Commitments which are to provide measures to control effects. Consultation and approval by TDC for these plans and register would provide a mechanism for TDC to regulate these effects and influence mitigation measures.
- 4.3.37 Therefore, the proposed development is highly likely to cause a significant adverse effect on noise and vibration particular those located within 1km of the airport and under the flight swathes.

4.4 Air Quality

Thanet Local Plan 2006 'Saved' Policies

- 4.4.1 Policy EC2 - Kent International Airport - Proposals that would support the development, expansion and diversification of Kent International Airport will only be permitted subject to the following requirements:
- 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.
- 4.4.2 Policy EP5 - Local Air Quality Monitoring - Proposals for new development that would result in the national air-quality objectives being exceeded will not be permitted. 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:
- 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.

Draft Thanet Local Plan Policies

- 4.4.3 Policy SE05 – Air Quality - 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, development will be located where it is accessible to support the use of public transport, walking and cycling.

New development must ensure that users are not significantly adversely affected by the air quality and include mitigation measures where appropriate.

All developments which either individually or cumulatively are likely to have a detrimental impact on air quality, will be required to submit an Air Quality and/or Emissions Mitigation Assessment, in line with the Air Quality Technical Planning Guidance 2016 and any subsequent revisions.

The Air Quality Assessment should address the cumulative effect of further emissions.

The Emission Mitigation Assessment should address any proposed mitigation measures 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.

Proposals that fail to demonstrate these will not be permitted.

Key Local Issues

- 4.4.4 Air quality issues resulting from the development will consist of those associated with both construction and operational phases and is a major local concern with regards to the operation of the airport. The airport has been inactive since 2014 and the restarting of airport operations will have an adverse impact on air quality.
- 4.4.5 A small part of the proposed development (fuel farm and outfall pipeline) is located within the Thanet Urban Air Quality Management Area (AQMA) which was designated in 2011. The flight paths of the planes will cross this AQMA when landing on Runway 28 or taking off from Runway 10. This AQMA is the largest in Kent and covers the majority of the built-up areas of the District. Any adverse impacts on this AQMA will cause significant affects for those living and working in this area and particularly at High Street St Lawrence, Ramsgate where baseline levels are relatively high.
- 4.4.6 In addition to the impacts on the existing AQMA, there is the potential for adverse impacts from aircraft and road traffic at other locations in Thanet such as properties located close to the main road links. There are also potential impacts that may arise the construction phase in relation to fugitive dust and emissions from construction vehicles.
- 4.4.7 The Council has produced an Air Quality Technical Planning Guidance August 2016, in conjunction with the Kent and Medway Air Quality Partnership. The

guidance sets out the approach that should be adopted from pre-application stage through to submitting details to the local planning authority.

- 4.4.8 It is likely that jobs created by the proposed development are likely to be filled by those living within the Thanet Urban AQMA and thus will make their journeys to the proposed development site through the Thanet Urban AQMA whereas before employment may have been confined to the urban area. Or alternatively, they may have been unemployed and the journey not made at all. It is important that the Applicant makes provision for public transport, cycling facilities and other incentives to reduce the use of private vehicles.
- 4.4.9 The proposed fuel storage and handling may lead to risks of odours and there are also optional impacts on nearby designated habitat sites, including European sites.

Adequacy of Application/dDCO

- 4.4.10 The air quality assessment set out in the ES is adequate in most regards. The assessment has been updated from the PEIR to include a detailed assessment of potential impacts of air pollutants on designated habitat sites as part of Appendix 7.1. This shows that there would be no significant impacts on nature conservation sites due to emissions to air resulting from the proposed development.
- 4.4.11 The ES refers to the Thanet District Council (2014) LAQM Progress Report. September 2014, the Council has subsequently reviewed the air quality in the district and published the Thanet District Council (2017) Air Quality Annual Status Report (ASR) – June 2017. The Applicant should reference is made to the ASR which is the most up-to-date air quality document.
- 4.4.12 The detailed air quality assessment indicates that the proposed development would result in an increase in air pollution within the Thanet Urban AQMA, and in particular at High Street St Lawrence. The ES does not include measures designed to “cancel out air quality impacts” in accordance with Thanet District Council’s Air Quality Planning Guidance and both existing policy EP05 and proposed policy SE05. Impacts on air quality at other locations, where background levels of air pollution are lower, would not be significant. When confirmed, appropriate mitigation should be secured via a DCO requirement, potentially by specifying the required mitigation in an Operational Environmental Management Plan (OEMP), such as proposed in DCO Schedule 2 article 7(2)(a)(viii).
- 4.4.13 The Construction Environmental Management Plan (CEMP) (ES Appendix 3.2) and proposed Dust Management Plan identifies a range of measures to mitigate the potential air quality impacts during construction. Further measures consistent with the relevant IAQM guidance should be incorporated in the Dust Management Plan to ensure that the risk of significant dust impacts is fully mitigated. This should be secured via a DCO requirement, potentially by specifying the required mitigation in a CEMP, such as proposed in DCO Schedule 2 articles 6 and 7(2)(a)(viii).
- 4.4.14 The ES includes an assessment of potential odour impacts, and highlights mitigation which would be designed to avoid odour impacts at nearby sensitive locations. The ES confirms that further review of odour controls will take place at the detailed design stage. It is considered that the risk of odours has been adequately addressed in the ES. Appropriate mitigation should be included in the OEMP, and secured via a DCO requirement, potentially by specifying the required mitigation, such as proposed in DCO Schedule 2 article 7(2)(a)(viii).

4.4.15 Requirement 7 of the draft dDCO refers to an Operation Environmental Management Plan (OEMP) in which air quality management is a single chapter. Currently, the Requirement does state that the OEMP requires approval from either the Secretary of State or the relevant local planning authority.⁵ Moreover, Requirement 7 (2)(a) states the OEMP must contain chapters or separate action plans 'addressing' a list of aspects but the draft dDCO defines 'address' as "any number or address for the purposes of electronic transmission". Therefore it is unclear whether the OEMP will provide sufficient mitigation and how that would be controlled. It is envisaged that a Section 106 agreement would secure funding for a continuous air quality monitoring stations and the use of dispersion modelling to ensure the proposed mitigation measures are effective. As set out later in section 4.13, TDC considers that the OEMP should be a Document to be Certified, with TDC being the relevant approval body.

Conclusion

4.4.16 It is concluded that, subject to receiving clarification on some aspects of the air quality study, the proposed development would not give rise to significant adverse effects on air quality, except for the forecast increase in air pollution in the Thanet Urban AQMA. Therefore, the proposed development is likely to cause a negative impact on air quality.

4.4.17 In order to address this outstanding issue, it is recommended that mitigation measures should be proposed and evaluated in accordance with the guidance in Thanet District Council's Air Quality Technical Planning Guidance (2016). These mitigation measures should as a minimum include the "standard mitigation" provision of electrical charging points, as set out in Section 5.1 of this guidance. Further measures such as those set out in Table 3 of the guidance are likely to be needed in order to fully offset the potential impacts of emissions resulting from the proposed development in the AQMA. The effectiveness of the proposed mitigation measures should be demonstrated using dispersion modelling, or in some other way, provided the method chosen clearly shows the air quality benefits. The provision of a continuous air quality monitoring station together with on-going funding secured in a Section 106 agreement under Section 174 of the Planning Act 2008 (as amended) and use of dispersion modelling, would assist in confirming the effectiveness of the proposed mitigation measures.

4.5 Land Quality, Contamination and Groundwater

Thanet Local Plan 2006 'Saved' Policies

4.5.1 Policy EC2 - Kent International Airport - Proposals that would support the development, expansion and diversification of Kent International Airport will only be permitted subject to the following requirements:

- 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.

⁵ Please note also our comments at section 4.123 on the wider issue of approval bodies

- 4.5.2 Policy EP13 - Groundwater Protection Zones - 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.

Draft Thanet Local Plan to 2031 Policies

- 4.5.3 Policy SE03 - Contaminated Land - 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.

Development on land known or suspected to be contaminated or likely to be adversely affected by such contamination will only be permitted where:

- 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, before occupation.

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 under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land.

- 4.5.4 Policy SE04 - Groundwater Protection - Proposals for development within the Groundwater Source Protection Zones identified on the Policies Map 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.

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.

Key Local Issues

- 4.5.5 The site is underlain by the Principal Chalk aquifer, overlain in places by quaternary head deposits. The baseline describes the site being underlain by quaternary deposits comprising clay and silt, whereas mapping shows these to be absent over much of the site. Clarification of the extent of superficial cover overlying the Chalk is required.

- 4.5.6 The site lies entirely within the catchment of the Source Protection Zone (SPZ) for the Lord of the Manor groundwater abstraction. This abstraction, which is a significant groundwater resource, relies substantially on an adit in the Chalk which runs below the existing runway, approximately 50m below the site. The runway and part of the site are in SPZ Zone 1, and the south-central and south-east part of the site is in SPZ Zone 2.
- 4.5.7 The Chalk aquifer derives its permeability from secondary permeability (fracture flow) and is therefore highly susceptible to pollution due to rapid transport of dissolved and particulate contaminants through fracture networks. Groundwater from the chalk rock beneath Thanet is used to supply water for drinking water, agriculture, horticulture and industry. It also feeds the springs that emerge along the coast and near the marshes. The groundwater is extremely vulnerable to contamination as substances (natural substances and man-made chemicals) are able to pass rapidly through the thin soils and the natural fissures (cracks) in the chalk rock to the groundwater below the ground surface.
- 4.5.8 It is considered that the former land use is likely to have resulted in potentially significant land quality impacts, particularly in the runway area where Fog Investigation and Dispersal Operation (FIDO) was carried out and runway foams were used. This method for clearing fog was used during the Second World War and was installed at Manston Airport. The FIDO system used the burning of fuel either side of the runway to disperse fog to enable aircraft to land safely.
- 4.5.9 The previous use of chlorinated solvents and radiological materials are also potentially significant issues that may be present and complex to deal with as well as the potential for asbestos to be present in soils (possibly in deliberate disposal pits of significant volume). The adit under the runway which feeds the Lord of the Manor PWS is a highly sensitive receptor protecting this receptor may require rephrasing or redesign of the scheme once the distribution of contamination is better understood.
- 4.5.10 The Lord of the Manor PWS is not identified as a separate receptor. This is an omission and should be included, due to the presence of an adit which feeds the PWS directly below the runway. Specific measures may be needed to protect this receptor that would not apply to the wider aquifer.
- 4.5.11 A County-wide Contaminated Land Strategy is being prepared by the Kent & Medway Contaminated Land Forum and will form part of the evidence base for this Plan once it has been finalised. The Council has a Contaminated Land Strategy for the district - this is currently being reviewed.

Adequacy of Application/dDCO

- 4.5.12 Potential effects have been identified for humans, buildings and services, soils, controlled waters (coastal waters, Pegwell Bay and Sandwich Bay) and controlled waters (Principal Aquifer in Bedrock and dependent receptors). The primary means of mitigation is via a Construction Environmental Management Plan, and also via specific measures in the design and construction of a new fuel farm and generic measures for site investigation and piling. However, there is a lack of baseline data to establish the contamination profile at the site. In agreement with the Environment Agency, additional site investigation data and assessment have not been submitted with the DCO application. Several outstanding concerns therefore remain regarding

the specific measures that will be implemented to protect groundwater and human health receptors from what may be a complex contamination profile at the site.

- 4.5.13 There are several omissions from the report including information on aircraft breaking activities at the site, consideration of climate change with respect to potential risk management, explicit identification of potential radiological contamination, explicit identification of the adit and PWS as receptors, and inter-related effects associated with flooding. The action of landing aircraft on vibration and turbidity in the aquifer has not been considered. The requirement for, nature and duration of soil or groundwater remediation activities, and associated environmental and human health protection measures cannot be ascertained on the basis of the data provided. It is considered that the NTS does not fully reflect the sensitivity of the PWS receptor at the site or the potential for contamination at the site.
- 4.5.14 Many of the shortcomings of the application are associated with a lack of site investigation and assessment leading to an incomplete baseline and lack of confidence in the identified mitigation measures. The applicant has agreed with the Environment Agency that no intrusive investigation will be undertaken prior to consent being granted. Article 11 of the Schedule 2 requirements of the draft DCO stipulates what must be done in the event that contaminated land, including groundwater, is found at any time when carrying out the authorised development, but does not stipulate that site investigations must be undertaken nor what form they should take.
- 4.5.15 There is potential for non-standard remediation methods to be necessary to protect the groundwater receptor, which could affect the phasing and layout of the development. These mitigation measures cannot be defined without an adequate baseline. In addition, Thanet District Council's local plan policy SE03 requires that site investigation and assessment should accompany applications for development of land suspected to be affected by contamination. In the absence of site investigation and assessment, it is considered that a scheme of proposed site investigations should be submitted with the DCO application, along with potential (including worst-case) remediation scenarios that might be employed and a scheme of groundwater monitoring to allow identification of any deterioration in groundwater quality during construction and operation of the development.
- 4.5.16 Chapter 17 of the Environmental Statement covers Major Accidents and Disasters, including plane crashes (referred to as air incidents) which have the potential to release pollutants including fuels and fire-retardant foams on and around the runway. Approval from the EA will be required on specific mitigation for containment of pollutants including any routing of surface run-off via the on-site interceptors.
- 4.5.17 Article 15 of the Schedule 2 requirements of the draft DCO stipulates that no piling or intrusive works (including drilling) shall be undertaken on the site until a risk assessment and method statement have been submitted to and agreed in writing by the secretary of state following consultation with Southern Water and the Environment Agency, and that works shall then be carried out in accordance with the method statement. This is a necessary requirement to ensure that intrusive works do not cause pollution of the aquifer or adit, however as with Article 12 of Schedule 2, there is no obligation in the draft DCO requirements for site investigations or monitoring of groundwater quality to be undertaken, which are considered necessary for the protection of human health and groundwater quality.

Conclusion

- 4.5.18 There is a lack of baseline data and the contamination status of the site is poorly defined. Given the potential for complex and recalcitrant contamination at the site due to historic use of fuels, chlorinated solvents, asbestos, radiological materials, runway foams and de-icing agents, and the very high sensitivity of the local groundwater in the Chalk aquifer, due to a public water supply adit underlying the runway, it is considered that there is a high potential for significant adverse effects on groundwater quality, and to a lesser degree human health. Generic proposals have been put forward for mitigation of potential effects, but these are considered insufficient to demonstrate that significant negative impacts can be avoided.
- 4.5.19 The proposals are not currently considered to be fully in accordance with Local Plan policies EC2 and EP13 or draft local plan policies SE03 and SE04. The draft DCO requirements do not currently oblige the developer to undertake site investigations to inform the identified mitigation measures nor to undertake groundwater quality monitoring to protect the sensitive groundwater receptor, which is considered a significant omission. Therefore, on the basis of the current draft of the DCO, reinstating of airport operations is likely to have a negative local impact.

4.6 Landscape and Visual Impact

Thanet Local Plan 2006 'Saved' Policies

- 4.6.1 Policy EC2 - Kent International Airport - Proposals that would support the development, expansion and diversification of Kent International Airport will only be permitted subject to the following requirements:

- 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) 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;
- 4) appropriate landscaping schemes, to be designed and implemented as an integral part of the development*.

* Given the prime role of Kent International Airport in the strategy of this Plan, the District Council will carefully consider the potential adverse impacts of landscaping and nature conservation enhancements in the vicinity of the airport, given, for example, the potential to increase the risk of bird strike.

- 4.6.2 Policy D2 - landscaping - the following elements will be required as part of landscaping proposals for any new development:

- 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
- 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.

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.

4.6.3 Policy CC2 - Landscape Character Areas - Within the landscape character areas identified on the proposals map, the following policy principles will be applied:

- 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;

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.

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.

Draft Thanet Local Plan to 2031 Policies

4.6.4 Policy SP23 - Landscape Character Areas - The Council will identify and support opportunities to conserve and enhance Thanet's landscape character and local distinctiveness.

Development proposals should demonstrate how their location, scale, design and materials will conserve and enhance Thanet's local distinctiveness, in particular:

- 1) Its island quality surrounded by the silted marshes of the former Wantsum Channel and the sea;
- 2) A sense of openness and 'big skies', particularly in the central part of the District;
- 3) Its long, low chalk cliffs and the sense of 'wildness' experienced at the coast and on the marshes;
- 4) Gaps between Thanet's towns and villages, particularly those areas designated as Green Wedges;
- 5) Long-distance, open views, particularly across the Dover Strait and English Channel, North Sea and across adjacent lowland landscapes; and
- 6) Subtle skylines and ridges which are prominent from lower lying landscape both within and beyond the District.

Development proposals should demonstrate how they respect and respond to the character, key sensitivities, qualities and guidelines of the relevant landscape character areas, as detailed in the Landscape Character Assessment (LCA) and summarised below.

All development should seek 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.

Development should generally be directed away from the Stour Marshes (E1), Wade Marshes (E2) and Pegwell Bay (F1) character areas (as detailed in the LCA), as these are largely undeveloped and key to retaining the island character of Thanet. The undeveloped character of Landscape Character Type F: Undeveloped Coast should also be maintained.

Proposals on the coast (within landscape character types F: Undeveloped Coast and G: Developed Coast and the surrounding area) should respect the traditional seafront architecture of the area, maintain existing open spaces and should ensure that recreational and wildlife opportunities are not compromised by development. Proposals should maintain and enhance the setting of sandy bays, low chalk cliffs and associated grassland and long sweeping views of the coastline.

The rural-urban boundary is distinctive in some parts of Thanet, particularly where there is an abrupt urban edge and where the countryside extends into the urban areas as Green Wedges. The distinction between town and countryside should be retained.

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. In such cases, landscape impacts should be minimised and mitigated as far as possible.

4.6.5 Policy GI06 - Landscaping and Green Infrastructure - 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:

- 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
- Retain historic features including boundaries and layouts
- Improve connectivity between new and existing features

The developer will need to satisfy the Council that adequate arrangements to ensure continued maintenance of landscaping has been made. The Council may seek to secure arrangements for this purpose through a planning agreement.

4.6.6 Policy SE08 – Light Pollution - Development proposals that include the provision of new outdoor lighting or require specific lighting in connection with the operation of the proposed development will be permitted if it can be demonstrated that:

- 1) It has been designed to minimise light glare, light trespass, light spillage and sky glow through using the best available technology to minimise light pollution and conserve energy;

- 2) There is no adverse impact on residential amenity and the character of the surroundings;
- 3) There is no adverse impact on sites of nature conservation interest and/or protected and other vulnerable species and heritage assets;
- 4) There is no adverse impact on landscapes character areas, the wider countryside or those areas where dark skies are an important part of the nocturnal landscape;
- 5) It does not have an adverse impact on long distance views or from vantage points;
- 6) Where appropriate, mitigation measures are proposed.

In addition a lighting strategy may be required for large developments or those developments with specific lighting requirements or for those that are in or adjacent to sensitive locations.

A Landscape and Visual Impact Assessment will be required for proposed developments that fall in to the E1 category.

Key Local Issues

- 4.6.7 Thanet has historically been recognised for its distinctive wide, simple and unrestricted views. Thanet has a distinct landscape area defined by the Wantsum channel which gave Thanet its "island" identity by separating it from the mainland. The Channel silted up around 1,000 years ago, and is characterised by former shoreline and port settlements and irregular fields bounded by roads, tracks and paths.
- 4.6.8 The emerging Thanet Landscape Character Assessment identifies the proposed development as being in the landscape character area A1: the Manston Chalk Plateau, a generally flat or gently undulating landscape, with extensive, unenclosed fields under intensive arable cultivation. This open landscape is fragmented by the location of large scale developments such as the former airport, Manston Business Park and a sporadic settlement pattern to the north of the airport. The character of this area is also defined by the proximity of the edges of the urban areas.
- 4.6.9 This character area contains the highest point on the island at Telegraph Hill. The elevated plateau results in long distance panoramic views to the south over Minster Marshes and across Pegwell Bay and, in the west, across the Wantsum. The elevated central chalk plateau also forms a skyline in many views back from lower landscapes in Thanet, including the coast and marshlands.
- 4.6.10 Many of the villages in and around the area have retained their separate physical identity, historic character and have vibrant communities with local facilities and services.
- 4.6.11 The site is current sparsely occupied by mainly low-rise buildings and the existing airport infrastructure, such as the paved areas (including the runway and taxiway etc), the Radar tower, terminal buildings and car park. The proposed development seeks to substantially increase the amount of built development and paved areas permanently altering the character of the area, including introducing new high level lighting columns. One of the biggest impacts is on the development of the northern grass area which is currently undeveloped land.

- 4.6.12 The impact upon the landscape and visual impact is demonstrated by the fact the ES concluded there would be significant effects on 17 residential receptors, seven recreational receptors and four viewpoints.

Adequacy of Application/dDCO

- 4.6.13 Whilst the Council supports the use of the 2017 Thanet Landscape Character Assessment (LCA) as the most up to date study, Policy SP23 in the draft local plan (2018) should also have been assessed as it is this policy to which the LCA relates to and seeks to implement. As part of this implementation, it is the Council's intention to adopt the LCA as a Supplementary Planning Document and this was advertised and consulted upon to this effect, for 6 weeks from 23rd August to 4th October 2018. Whilst the ES refers to the key characteristics of each of the landscape character areas that have the potential to be affected by the proposal, it does not address the key sensitivities and qualities in any great detail for each LCA. In addition, the ES does not address the Guidelines set out in the Council's document for each of the LCA's in relation to the proposal as required by draft Policy SP23.
- 4.6.14 LCA A1: Manston Chalk Plateau is probably the critical area and the ridgeline is vulnerable to development impacts. The Council does not accept the assessment in ES that the susceptibility of the area is "low". It is dependent on how development proposals affect the ridgeline, and views of the ridgeline, through their precise location and scale. The importance and vulnerability of the skyline of the central chalk plateau is recognised by both the existing policy CC02 and the draft policy SP23.
- 4.6.15 LCA's that are particularly affected by long distance views to, from and across the LCA towards the chalk plateau are: B1: Wantsum North Slopes E1 Stour Marsh, E2 Wade Marshes. In addition long distance views to the coast and seascape and landmark features together with avoiding new large vertical reflective development are also important in LCAs C1 St Nicholas at Wade Undulating Chalk Farmland and C2: Central Thanet Undulating Chalk Farmland.
- 4.6.16 The inclusion of additional viewpoints in line with our previous comments is welcomed. The viewpoint plan submitted broadly accords with the comments in the Council's response to the PEIR, however viewpoint 5 is sited on Canterbury Road West, rather than on the A256 adjacent to the eastern extent of the site to the south of the Manston Green site. The response to the Council's request in Table 11.5 of the ES is noted, however a viewpoint should have been provided situated to the east of the eastern extent of the site on the Haine Road, given the visibility of the airport from this area from the road and the committed residential development at Manston Green and visual receptors that will be present in this community.
- 4.6.17 The ES provides wireframes at all 22 locations at Appendix 11.1. These show the highly urbanising effect of the proposed development on the landscape of the district, with a significant effect deemed at multiple viewpoints at Appendix 11.3 and the particular effect of the "aircraft breakdown hangers" shown in the wireframe drawings on residential receptors at Manston, amongst other. It would assist the Council if the methodology for the production of the wireframe analysis could be provided, as this is not outlined in any of the documentation, to ensure transparency and accuracy of the display of visual effects of the development. This will also help with explaining to the community how they were produced.

- 4.6.18 As no detailed mitigation has been produced, nor has this been integrated into the Masterplan, we are not in a position to assess whether the impact on visual receptors and the landscape of the district will be acceptable or not. For example, from viewing the masterplan, no buffer or screening is proposed to be provided along the eastern extent of the site to the south of Manston Road and Manston Village, which will contribute to a significant impact on close views of the site from the village. This will need to be included in Requirement 10 Landscaping.
- 4.6.19 The application only provides viewpoints 6, 9 and 20 as visualisations. Despite previous requests, no night-time visualisation example has been provided. As per previous comments, no assessment of the effects of lighting from the proposed development has been undertaken, which in turn means that night-time visualisations have not been produced for consultation.
- 4.6.20 An Outline Lighting Strategy has been provided in Chapter 3 at paragraphs 3.3.75 – 3.3.78. These brief paragraphs state that both the airport and business park lighting has been designed in accordance with the International Commission on Illumination (CIE) Guide: CIE 150:2003 but there is no evidence that any assessment has been undertaken or that this has been achieved. Further information on the impact on visual receptors from this element of the development is still required.
- 4.6.21 Moreover, the dDCO does not contain any requirement regarding a full lighting strategy or scheme and the ES does not commit to producing a Lighting Strategy that particularly relates to landscape and visual impacts. Schedule 1 Article 2 is inadequate as it does not contain sufficiently clear references to matters such as the design, height and location of any high mast lighting required within the airport for aprons and stands.
- 4.6.22 The Register of Environmental Actions and Commitments proposes a number of mitigation measures linked to the Requirement 10 in the dDCO but states that details regarding the use of building materials, detailing and finish for the roofs and facades of proposed buildings will be submitted when discharging requirements. Therefore, the adequacy of these mitigation measures cannot be fully assessed, however, the dDCO does make provision for these details to be submitted to and approved by the SoS following consultation with local planning authority.

Conclusion

- 4.6.23 Due to the proposed increase in built area, including a new business park, passenger terminal and cargo facilities, it is considered that the proposed development is likely to have a negative local landscape and visual impact. Mitigation measures have been proposed in order to lessen the associated impacts however, as the proposed development has not been designed in detail yet it is not possible to provide a full review of these mitigation measures and the full impact.

4.7 Historic Environment

Thanet Local Plan 2006 'Saved' Policies

- 4.7.1 Policy HE11 - Archaeological Assessment - 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.

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.

- 4.7.2 Policy HE12 - Archaeological Sites and Preservation - 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.

Draft Thanet Local Plan to 2031 Policies

- 4.7.3 Policy SP34 - Conservation and Enhancement of Thanet's Historic Environment - The Council will support, value and have regard to the historic or archaeological significance of Heritage Assets by:

- 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 or its historical or archaeological significance,
- 3) requiring the provision of information describing the significance of any heritage asset affected and the impact of the proposed development on this significance,
- 4) facilitating the review of Conservation Areas and the opportunities for new designations,
- 5) recognising other local assets through Local Lists,
- 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,
- 7) issuing Article 4 Directions which will be introduced and reviewed as appropriate,
- 8) supporting development that is of high quality design and supports sustainable development.

All reviews and designations will be carried out in consultation with the public in order to bring a shared understanding of the reasons for the designation and the importance of the heritage asset.

- 4.7.4 Policy HE01 – Archaeology - 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

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. 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.

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:

- 1) The character, significance, extent and condition of any archaeological deposits or structures within the application site;
- 2) The likely impact of the proposed development on these features;
- 3) The means of mitigating the effect of the proposed development.

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.

- 4.7.5 Policy HE03 - Local Heritage Assets - 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.

Proposals that affect non-designated heritage assets, will be assessed on the scale of harm, both direct and indirect, or loss and the significance of the heritage asset. Proposals will only be permitted where they retain the significance, appearance, local distinctiveness, character or setting of a local heritage asset.

Key Local Issues

- 4.7.6 Whilst no designated heritage assets are directly affected by the proposed development it is likely that non-designated heritage assets could be affected. Any undeveloped areas of the site are likely to be of most archaeological value, in particular the Northern Grass area.
- 4.7.7 Indirect-effects from the operation of the airport are likely to affect heritage assets outside the site boundary and in particular where they are situated in the flightpath.

The noise and vibration impacts arising from the flightpaths can affect the setting of designated heritage assets including the Conservation Areas of Ramsgate, Broadstairs, Minster and Acol. This is a particular concern as the noise mitigation plan proposes to provide noise insulation for buildings to overcome significant effects, however, listed buildings in the flight path may be unable to change windows to provide additional alleviation from aircraft noise without potential harm to the significance of the asset.

- 4.7.8 Kent County Council (KCC) and Historic England are key consultees that have been consulted on the proposal and will take the lead with regard to matters relating to Historic Environment.

Adequacy of Application/dDCO

- 4.7.9 No additional information regarding archaeological investigation appears to have occurred since the previous consultations. The response to the Council's comments on required trial trenching is stated as:

“Due to limitations on access for intrusive surveys, specific information requirements will be addressed when access can be obtained. The scope of further intrusive survey will be discussed with KCC, TDC and HE. An Archaeological Written Scheme of Investigation will be provided with the ES chapter. It is recognised that given the gap in understanding, alterations to some of the project design may be required to preserve significant assets in situ in the northern grass area.”

- 4.7.10 As previously outlined, given the extent of development on the Northern Grass within the proposal, TDC consider that trial trenching should be carried out. Paragraph 9.3.12 of ES states that RiverOak envisage further survey work, including trial trenching, will be undertaken, and it is expected that this will form part of a written scheme for the investigation of areas of archaeological interest as part of Requirement 16. This Requirement is considered adequate in securing the scheme as it also requires archaeological investigation prior to commencement of a particular part of the authorised development. However given the quantum of development which would be approved by the DCO on the Northern Grass, it is unclear however the proposed layout could respond to the discovery of a feature of high significance in this area to allow for preservation in situ.
- 4.7.11 Kent County Council (KCC) and Historic England have been consulted on the proposal, and these bodies are key consultees and their expertise should be relied upon.
- 4.7.12 The dDCO does not currently account for the indirect effects from the operation of the airport that are likely to affect heritage assets outside the site boundary and in particular where they are situated in the flightpath. As stated, the noise mitigation strategy proposes to provide noise insulation for buildings to overcome significant effects, however, listed buildings in the flight path may be unable to change windows to provide additional alleviation from aircraft noise without potential harm to the significance of the asset.

Conclusion

- 4.7.13 There are areas within the dDCO boundary which may be of high archaeological value that will require further investigation prior to the commencement of the development with greater flexibility necessary on the Northern Grass to accommodate preservation in-situ in the absence of trial trenching within the application. Designated and non-designated heritage assets affected by noise will need assessing to ensure that the noise and vibration impacts on these heritage assets can adequately mitigate any negative effects. If not, further mitigation would be required that is specific to designated and non-designated heritage assets. Overall, the local impact on the historic environment is considered negative on the basis of the current drafting of the DCO due to the uncertainty about potential impact on archaeology on the Northern Grass.

4.8 Traffic and Transportation

Thanet Local Plan 2006 'Saved' Policies

- 4.8.1 Policy EC2 - Kent International Airport - Proposals that would support the development, expansion and diversification of Kent International Airport will only be permitted subject to the following requirements:
- 7) any new development which would generate significant surface traffic must meet requirements for surface travel demand in compliance with Policy EC3.
- 4.8.2 Policy TR3 - Provision of Transport Infrastructure - The District and County Councils will ensure, by means of a 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.
- 4.8.3 Policy TR12 - Cycling - in order to promote increased use of cycling:
- 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.
- 4.8.4 Policy TR15 - Green Travel Plans - 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. The council will seek to approve measures, which will assist implementation of green travel plans and school travel plans.

4.8.5 Policy TR16 - Car Parking Provision –

- a) proposals for development will be required to make satisfactory provision for the parking of vehicles (including, where appropriate, service vehicles). Proposals seeking car parking provision above the standards set out in Appendix G will not be permitted. 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.

Draft Thanet Local Plan to 2031 Policies

4.8.6 Policy SP41 - Safe and Sustainable Travel - 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.

4.8.7 Policy SP42 - Accessible locations - 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.

4.8.8 Policy SP43 - Transport Infrastructure - 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.

Subject to individual assessments, schemes maybe required to provide or contribute to:

- 1) Capacity improvements/connections to the cycle network
- 2) Provision of pedestrian links with public transport routes/interchanges
- 3) Improvements to passenger waiting facilities
- 4) Facilities for display of approach time information at bus stops along identified quality bus corridors
- 5) Improvement and expansion of public transport services
- 6) Improvements to the road network in line with schemes identified through the Transport Strategy.

4.8.9 Policy SP47 - Strategic Routes - The following areas, as shown on the Policies Map, are safeguarded for the provision of key road schemes and junction improvements, to support the implementation of the Thanet Transport Strategy, including land at:

- 2) B2050 Manston Road, Birchington
 - 4) Shottendane Road-Manston Road housing site
 - 5) Nash Road-Manston Road housing site
 - 8) Manston Court Road/Star Lane (from Haine Road, Westwood to B2050 Manston Road)
 - 9) B2050 Manston Road (from Manston Court Road to Spitfire Junction)
 - 10) B2190 Spitfire Way (from Spitfire Junction to Columbus Avenue junction)
 - 11) From Columbus Way to Manston Road, Birchington
- 4.8.10 The Council expects all new development to make a proportionate and appropriate contribution to the provision of this key infrastructure.

Key Local Issues

- 4.8.11 KCC, as the Highways Authority, will provide comments on the impacts arising from the proposed development on the highway network.
- 4.8.12 The emerging Local Plan proposes a number of housing allocations close to the proposed development which are anticipated to have implications on the assessed highways impacts of the proposed development.
- 4.8.13 The Transport Assessment should include the expected housing requirement within the submitted draft Thanet Local Plan 2018, including any additional housing requirement resulting from the proposed development. TDC have concerns regarding 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, particularly regarding Spitfire Way, Spitfire Junction and Manston Court Road.
- 4.8.14 The methodology for distributing trips on the network for the Transport Assessment should be based on either the KCC and TDC strategic model, or a similar strategic model compatible with the KCC and TDC built for the purpose of analysing the distribution of trips on the network. A spreadsheet model is considered inappropriate for the level of trip generation created by the project without further information on how compatible this model is with the strategic model. Please refer to KCC Highways and Transportation for further guidance.
- 4.8.15 Physical improvements to the network are alluded to within the updated PEIR, however, they are only briefly outlined with no detailed plans produced. A crossroad junction proposed at the junction of Spitfire Way and Manston Road would be preferably a roundabout, however we await further information on how this revised junction would operate with the movement proposed. The project does not include the northern link from Manston Road to Westwood Cross within the site. This link forms part of the 'inner circuit' within the Thanet Transport Strategy (TTS).
- 4.8.16 Given that the commercial development on the Northern Grass appears to serve no functional purpose to the operation of the airport to the south, this area can and should be re-designed to include this route. The project will also be required to

contribute a proportionate amount to the Manston Airport-Haine Road link in the TTS outside of the extent of the site.

- 4.8.17 It is understood that an alternative link road may be provided in which discussions are still ongoing between the Applicant, Kent Highways and TDC.

Adequacy of Application/dDCO

- 4.8.18 Requirement 7(a)(xi) of the dDCO requires traffic management and green travel planning to be undertaken and Requirement 14 stipulates the need to provide a Construction Traffic Management Plan (CTMP). Provision is made under Part 3 relating to streetworks. The CTMP should be approved by TDC rather than the Secretary of State, in consultation with KCC and other relevant local authorities.
- 4.8.19 Concerns are raised that the route analysis and traffic distribution for the sensitivity test included in Section 10 is not reliable, as traffic distribution has been derived using assumptions on the level of traffic redistribution by the applicant's consultancy team, rather than being informed by a strategic traffic model with dynamic distribution..

Conclusion

- 4.8.20 The proposed development will lead to an increase in traffic movements in an area that is already constrained on roads which experience traffic issues such as the B2050 Manston Road and Manston Court Road. Moreover, the proposed development currently inhibits the delivery of draft Policy SP47 – Strategic Routes which includes a relief road from Manston Court Road to Manston Road – B2050 that crosses the Northern Grass. Therefore, it is considered that the proposed development will have a negative local impact on traffic and transportation.

4.9 Biodiversity

Thanet Local Plan 2006 'Saved' Policies

- 4.9.1 No specific policies relating to biodiversity have been saved.

Draft Thanet Local Plan to 2031 Policies

- 4.9.2 Policy SP24 - Green Infrastructure - All development proposals should respect and where possible, enhance Thanet's Green Infrastructure network by integrating Green Infrastructure provision in the design of developments. 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.

- Development should make a positive contribution to Thanet's Green Infrastructure network by:
- Creating new wildlife and biodiversity habitats
- Providing and managing new accessible open space for informal recreation/walking and dog walking
- Mitigating against the loss of any farmland bird habitats
- Providing private gardens and play space;

- Contributing towards the enhancement of Thanet's Biodiversity Opportunity Areas or the enhancement of the Green Wedges including the introduction of linear features such as native hedgerows
- Reinforcing and/or restoring landscape character in line with the relevant landscape character assessment guidelines.

Investment and developer contributions should be directed to improve and expand Green Infrastructure and provide connecting links where opportunities exist.

4.9.3 Policy SP27 - Biodiversity and Geodiversity Assets - Development proposals will, where possible, be required to make a positive contribution to the conservation, enhancement and management of biodiversity and geodiversity assets through the following measures:

- 1) the restoration / enhancement of existing habitats,
- 2) the creation of wildlife habitats where appropriate, by including opportunities for increasing biodiversity in the design of new development
- 3) the creation of linkages between sites to create local and regional ecological networks,
- 4) the enhancement of significant features of nature conservation value on development sites.

On sites where important biodiversity assets, including protected species and habitats including SPA functional land, or other notable species, may be present, an ecological assessment will be required to assess the impact of the proposed development on the relevant species or habitats. Planning permission will not be granted for development if it results in significant harm to biodiversity and geodiversity assets, which cannot be adequately mitigated or as a last resort compensated for, to the satisfaction of the appropriate authority.

4.9.4 Policy GI06 - Landscaping and Green Infrastructure - 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:

- 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
- Retain historic features including boundaries and layouts
- Improve connectivity between new and existing features

The developer will need to satisfy the Council that adequate arrangements to ensure continued maintenance of landscaping has been made. The Council may seek to secure arrangements for this purpose through a planning agreement.

Key Local Issues

- 4.9.5 KCC, Natural England and Environment Agency will comment as key consultees on the impact from the proposal on biodiversity and their expertise should be relied upon.
- 4.9.6 The biodiversity of Thanet and the environment is a key feature of Thanet which makes the area unique and attracts visitors. Any adverse impact of the proposed development on biodiversity could deter visitors from coming to Thanet for its diverse wildlife.

Adequacy of Application/dDCO

- 4.9.7 Requirement 7(a)(ix) requires a plan or chapter to make provision for wildlife management, however, as set out in section 4.13, this Requirement does not make provision for the submission and approval of the Operation Environment Management Plan. As explained further in section 4.13, TDC considers that it rather than the SoS should be the approving body for the OEMP, in consultation with other relevant organisations.
- 4.9.8 Requirement 8 makes provision for Ecological Mitigation and Requirement 12 makes provision for protected species. Again, TDC should be the approval body for these requirements, in consultation with Natural England and KCC Ecology.

Conclusion

- 4.9.9 According to the conclusion of the ES it is considered that there is likely to be a neutral local impact on biodiversity arising from the proposed development. Further detail upon the impacts on biodiversity will be provided by Natural England and KCC.

4.10 Health and Well-Being

Thanet Local Plan 2006 'Saved' Policies

- 4.10.1 No specific policies relating to health and well-being have been saved.

Draft Thanet Local Plan to 2031 Policies

- 4.10.2 Policy SP36 - Healthy and Inclusive Communities - The Council will work with relevant organisations, communities and developers to promote, protect and improve the health of Thanet's residents, and reduce health inequalities. Proposals will be supported that:

- 1) Bring forward accessible community services and facilities, including new health facilities,
- 2) Safeguard existing community services and facilities,
- 3) Safeguard or provide open space, sport and recreation
- 4) Promote healthier options for transport including cycling and walking,
- 5) Improve or increase access to a healthy food supply such as allotments, farmers' markets and farm shops,
- 6) Create social interaction and safe environments through mixed uses and the design and layout of development,

- 7) Create greener neighbourhoods and improve biodiversity and access to nature.

Key Local Issues

- 4.10.3 Significant concerns are raised about the potential impact from the project at all stages on public health and wellbeing, especially regarding potential sleep disturbance from the operation of the airport and air quality as discussed in other sections of this document.

Adequacy of Application/dDCO

- 4.10.4 A Health Impact Assessment (HIA) has been provided in Appendix 15.1 of the ES and appears adequate in its assessment. Where necessary, the HIA has drawn on data and effects from the relevant chapters in the EIA. Whilst the dDCO does not contain any references to health and well-being it is acknowledged that the factors that affect health and well-being, such as noise and air quality, have been assessed with mitigation proposed in their standalone chapters and have been included in Requirements in the dDCO which have been discussed in the relevant sections of this document.

Conclusion

- 4.10.5 Given the potential adverse impacts relating to noise, sleep disturbances and air quality the proposed development is likely to lead to negative local impacts relating to health and well-being.

4.11 Climate Change

Thanet Local Plan 2006 'Saved' Policies

- 4.11.1 No specific policies relating to Climate Change have been saved.

Draft Thanet Local Plan to 2031 Policies

- 4.11.2 Policy SO35 – Climate Change - New development must take account of:
 - 1) Adapting to climate change by minimising vulnerability, providing resilience to the impacts of climate change;
 - 2) Mitigating against climate change by reducing emissions and energy demands;
 - 3) Improving building resilience to climate change through the use of best available technology; and
 - 4) Opportunities to reduce the impact of climate change on biodiversity.

Key Local Issues

4.11.3 The Council has adopted the Climate Local Kent commitment for Thanet. Climate Local is a Local Government Association initiative to drive, inspire and support council action on a changing climate. The initiative supports councils' efforts both to reduce carbon emissions and also to improve their resilience to the effects of our changing climate and extreme weather. The Climate Local Kent Commitment sets aims which include:

- 34% reduction in emissions by 2020 (2.6% reduction per year).
- Retrofitting to existing homes.
- Reduce water consumption from 160 to 140 litres per person per day by 2016.
- Increase renewable energy deployment in Kent by 10% by 2020.

4.11.4 Environment Agency will comment as key consultees on the impact from the proposal on climate change.

Adequacy of Application/dDCO

4.11.5 Whilst the dDCO does not contain any explicit references to climate change the ES chapter on Climate Change assesses the inter-related effects of climate change, such as air quality and noise and vibration. The IEMA guidelines on Greenhouse Gas (GHG) emissions state that all GHG emission are significant. Whilst the level of significance is not clearly defined, the proposed development at worst case scenario in year 20 states a total emissions of 808.7 Kt CO₂. This would appear to result in a significant change from the baseline of zero. It is unclear how the Carbon Minimisation Action Plan will adequately off-set the worst-case scenario emissions. Moreover, the Carbon Minimisation Action Plan should be secured via a Requirement in the DCO.

4.11.6 A consultation by the UK Government (Aviation 2050 The future of UK aviation⁶) states that aviation accounts for around 7% of the UK's GHG emissions. The ES states that the worst-case scenario would be an additional contribution of 1.9% of the 2050 target of 37.5 MtCO₂. The consultation seeks achieve this target and thus any additional emissions would be considered an adverse significant effect in achieving this goal.

Conclusion

4.11.7 The proposed development in its inherent nature is likely to have a negative impact on climate change objectives.

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4.12 Other Matters

Major Accident and Disasters

- 4.12.1 Whilst it is recognised that accidents and disasters relating to airport activities are relatively low, incidents can cause significant adverse impacts. There are residential and employment properties within 1 km of the airport and significant urban areas included in the flight swathes meaning the impacts from accidents and disasters could lead to a significant loss of life.
- 4.12.2 The application does not include any reference to the anticipated Public Safety Zones for the airport and the potential impacts regarding the existing or future population including committed and proposed development.

Aircraft Maintenance Recycling Facilities

- 4.12.3 Whilst it is accepted that the potential contamination relating to the Aircraft Maintenance Recycling Facilities will be controlled by the EA permitting process the proposed use of the land for this processing is being requested and the proposed impacts should be examined and mitigated where possible. The EA permitting process must undertaken in tandem with the planning process as they are complementary.

Cumulative Impacts

- 4.12.4 The approach taken with regard to selecting major sites for cumulative assessment is agreed. TDC considers that the proposed zone of influence to be appropriate and acknowledges that assessment of traffic and transport goes beyond this distance.
- 4.12.5 Appendices 18.1 and 18.2 appear to be missing from the submitted application so it is unclear which sites have been excluded from the cumulative assessment and the reasons for their exclusion. Therefore, a comparative exercise between the allocated sites in the Local Plan and the sites included in the cumulative assessment cannot be fully undertaken. However, a simple comparison between figures 18.1 and 18.2 and the draft Local Plan proposals map indicates that some allocations have not been included in the cumulative assessment. As stated, until appendices 18.1 and 18.2 have been made available, TDC is unable to assess the long list of sites.
- 4.12.6 The omission of the cumulative impacts of Manston Airport and Lydd Airport both operating together is of concern. For TDC, the issue relates to the proposed socio-economic impacts of Manston Airport which could be comprised given that the effect of the Lydd Airport expansion has not been assessed.
- 4.12.7 TDC has provided a list of major planning applications that have been decided (Appendix 2: Major Planning Applications Decided Since March 2018) and major planning applications that are awaiting a decision (Appendix 3: Major Applications Awaiting Decision Since March 2018). The major planning applications are not included in the short listed sites that have been included in the Cumulative Assessment. There is the potential that one or more of this sites may affect the cumulative impact of the proposed development and the Applicant will need to determine whether these will need to be assessed.

4.13 General comments

Future development

- 4.13.1 The definition of “maintain” as set out in Article 2 is too broad and could allow significant future development without sufficient planning controls.
- 4.13.2 At present, the definition allows, amongst other things, the replacement, improvement or reconstruction of any part of the authorised development, including large-scale buildings and general B1 employment development. As worded, this would appear to allow the wholesale replacement of any authorised building with a completely new building, without any apparent need to obtain further consents. The Applicant’s suggested control (that such development is only allowed where the it would be “unlikely to give rise to any materially new or materially different environmental effects” is too vague and does not provide satisfactory controls.
- 4.13.3 To avoid confusion, Requirement 17 should also be amended by adding the underlined text (or wording to a similar effect) below.

With respect to any requirement which requires the authorised development to be carried out in accordance with the details or schemes approved under this Schedule, the approved details or schemes are taken to include any amendments that may subsequently be approved in writing where such amendments are permitted elsewhere in this Order.

Approval

- 4.13.4 The dDCO correctly contains several references to later approval being required, particularly in the list of Requirements in Schedule 2. At present, for reasons that are not at all clear, the dDCO proposes that most matters are approved by the Secretary of State when Thanet District Council is better placed and is the more appropriate body to give that approval. In particular, TDC should be the approval body (in consultation with other bodies where relevant) rather than the Secretary of State in relation to the following Requirements:

- 3: Development masterplan
- 4: Detailed design
- 5: Detailed design of local fuel depot
- 8: Ecological mitigation
- 10: Landscaping details
- 11: Contaminated land
- 12: Protected species
- 13: Surface and foul water drainage
- 14: Traffic management

- 15: Piling
- 16: Archaeology

4.13.5 It is clear that TDC has the local expertise to determine these matters, and indeed it would be usual practice for the Local Planning Authority to be the named approval body in such cases. TDC will also be aware of a wider local context, for example in terms of other nearby developments, which may be relevant when determining such details. It is also the case that TDC will ultimately be responsible for enforcement matters, and so it is essential that the local authority is fully involved throughout the approval process.

4.13.6 In contrast, it would not normally be part of the Secretary of State for Transport's remit to address such matters. Moreover, some requirements of the dDCO as drafted, such as Requirement 7, allow for the automatic discharging of the requirement without any approval. This is unacceptable to TDC as it does not provide adequate control.

4.13.7 In addition to these concerns, the procedure for discharging of requirements at Part 2 of the dDCO includes the provision at paragraphs 18(2) and (3) for automatic approval of any requirements submitted but not determined within a period of 8 weeks. These provisions significantly exceed those provisions made by Article 28-30 and Schedule 6 of the Town and Country Planning (Development Management Procedure) (England) Order 2015, which applies to large scale major development. These provisions should therefore be removed from the DCO as there could result in the approved development being carried out in accordance with details/plans which do not mitigate the impact of the development sufficiently. An appeal mechanism could be added to Part 2 to allow for the applicant to appeal a refusal or non-determination of a requirement unless an extension period for determination has been agreed.

OEMP

4.13.8 Requirement 7 for the provision of operation environmental management plan does not require the approval by the Secretary of State, relevant Local Planning Authority or other relevant consultees. As no Operation Environmental Management Plan (OEMP) has been submitted with the application it is expected that any OEMP, or part thereof, should need approval from the relevant body/authority, which in this case should be TDC.

4.13.9 If an OEMP was submitted it would be expected to be a certified document as set out in Schedule 10.

5 Summary

5.1.1 TDC has reviewed the application and proposed DCO and has concluded that there would be some negative, neutral and positive impacts as a result of the proposed development. However, the current application and dDCO does not adequately mitigate or make the necessary provisions in order to address the negative local impacts at this current time. TDC would welcome a revised dDCO that deals with the concerns raised in the LIR.

5.1.2 There are several gaps within the ES that have a fundamental impact on the local area that will need to be assessed. In particular, these include:

- The proposed job creation and the direct and indirect socio-economic impacts particularly in relation to housing;
- Noise and vibration impacts on residential, school and community receptors from daytime and night time noise levels, particularly those located within 1km of the airport and under the flight swathes;
- Noise mitigation considerations for heritage assets;
- The impacts on the Thanet Urban AQMA and the need for continuous air quality monitoring stations and funding to ensure the effectiveness of the proposed mitigation;
- Generic proposals for contamination which are insufficient in demonstrating significant effects can be avoided;
- The assessment of the landscape value as been low and lack of full methodology and mitigation;
- The need for further site investigation in the Northern Grass Area;
- The conflict between the delivery of draft Policy SP47 – Strategic Routes which includes a relief road from Manston Court Road to Manston Road – B2050 that crosses the Northern Grass.
- An underestimation of the impact on Climate Change in relation to the objectives set out in Aviation 2050: The Future of UK Aviation; and
- The lack of accordance with certain policies of both the adopted and local plan.

5.1.3 Therefore, TDC has not been able to assess the full impact of the proposed development and we would welcome this additional information to be provided for review.

5.1.4 The Requirements within the dDCO currently require approval from the SoS following consultation with the relevant bodies, however, TDC would be better placed to make these approvals. Moreover, some Requirements do not need approval from any relevant body which implies automatic approval that is

considered unreasonable. Provision for automatic approval in the event of non-determination of requirements is also considered to be unreasonable.

6 Appendices

APPENDIX 1: THANET LOCAL PLAN 2006 SAVED POLICIES

Chapter 2 – Economic Development & Regeneration

- EC1 Land Allocated for Economic Development
- EC2 Kent International Airport
- EC4 Airside Development Area
- EC5 Land at and East of the Airport Terminal
- EC6 Fire Training School
- EC7 Economic Development Infrastructure
- EC8 Ramsgate Waterfront
- EC9 Ramsgate New Port
- EC10 Margate Old Town and Harbour
- EC12 Retention of Employment Sites

Chapter 3 – Housing

- H1 Residential Development Sites
- H2 Dwelling Supply
- H3 Phasing
- H4 Windfall Sites
- H6 Residential Development Site – Westwood
- H7 Residential Development & Amenity Site – Minster
- H8 Size & Type of Housing
- H10 Areas in Special Need of Attention
- H11 Non Self-Contained Residential Accommodation
- H12 Retention of Existing Housing Stock
- H14 Affordable Housing Negotiations on Housing Sites
- H15 Rural Local Needs Housing

H16 New Agricultural Dwellings

Chapter 4 – Town Centres & Retailing

TC1 New Retail Development

TC4 Mixed Use Area

TC7 Margate, Ramsgate and Broadstairs Core Centres

TC8 District & Local Centres

TC9 Hot Food Takeaways

Chapter 5 – Transportation

TR3 Provision of Transport Infrastructure

TR4 New Road and Highway Improvements

TR5 Off-Street Servicing in Town Centres

TR8 Rail Link Safeguarding Direction

TR10 Coach Parking

TR12 Cycling

TR15 Green Travel Plans

TR16 Car Parking Provision

TR17 Retention of Existing Car Parking

TR18 Car Parking at Westwood and Out of Centre Locations

Chapter 6 – Design

D1 Design Principles

D2 Landscaping

D5 Advertisements

D7 Areas of High Townscape Value

D9 Accommodation for Elderly Relatives

Chapter 7 – Heritage

HE11 Archaeological Assessment

HE12 Archaeological Sites and Preservation

HE14 Montefiore Site

Chapter 8 – Tourism

- T1 Tourist Facilities
- T3 Self-Catering Accommodation
- T4 Hoverport Site Pegwell Bay
- T5 The Lido Site
- T6 Language Schools
- T7 Amusement Uses
- T8 Dreamland

Chapter 9 – Sport & Recreation

- SR1 New Facilities
- SR2 Jackey Baker's
- SR3 Maximising Use of Facilities
- SR4 Provision of New Sports Facilities
- SR5 Play Space
- SR7 Urban Fringe
- SR8 Formal Countryside Recreation
- SR9 Informal Countryside Recreation
- SR10 Public Open Space
- SR11 Private Open Space
- SR12 Playing Fields
- SR13 Allotments
- SR14 Community Woodland
- SR16 Equestrian Uses and Buildings
- SR18 Major Holiday Beaches
- SR19 Intermediate Beaches
- SR20 Undeveloped Beaches

Chapter 10 – Countryside & Coast

- CC1 Development in the Countryside

- CC2 Landscape Character Areas
- CC5 Green Wedges
- CC7 Rural Lanes
- CC10 Farm Diversification

Chapter 11 – Rural Settlements

- R1 General Levels of Development
- R2 Village Gaps
- R3 Village Services
- R4 Village Shops

Chapter 12 – Nature Conservation

- NC3 Local Wildlife Sites
- NC6 RIGs Sites

Chapter 13 – Environmental Protection

- EP2 Landfill Sites
- EP5 Local Air Quality Monitoring
- EP7 Aircraft Noise
- EP8 Aircraft Noise and Residential Development
- EP9 Light Pollution
- EP13 Groundwater Protection Zones

Chapter 14 – Community Facilities

- CF1 Community Facilities
- CF2 Development Contributions
- CF3 Training Facilities
- CF4 QEQM Hospital Margate
- CF5 Margate Cemetery
- CF6 New Education Site

APPENDIX 2: MAJOR PLANNING APPLICATIONS DECIDED SINCE MARCH 2018

App No	ADDRESS	Decision Date	PROPOSAL
F/TH/17/0860	Farleys 46 - 54 Chatham Street RAMSGATE Kent CT11 7PR	20/04/2018	Change of use and conversion of Townley House from retail and storage to 10no. self-contained flats, following demolition of rear extensions, and erection of 9no. dwellings and 4no. self-contained flats, with associated parking, landscaping and boundary treatment, following demolition of outbuildings to rear and 48-54 Chatham Street
OL/TH/17/1523	Land West Of Hundreds Farm House Canterbury Road Westgate On Sea Kent	09/05/2018	Outline application for the erection of a three storey building containing 12No. 2-bed self contained flats with associated parking, including access, appearance, layout and scale, following demolition of existing building
OL/TH/17/1763	Manston Court Bungalows 5 Manston Road Manston RAMSGATE Kent	14/05/2018	Outline planning application for the erection of up to 22 dwellings including access
F/TH/17/1508	81 - 85 High Street RAMSGATE Kent	15/05/2018	Erection of a 4 storey building to provide 6No. 1 bedroom and 8No 2 bedroom self contained flats
OL/TH/17/1342	Land North East Of The Length St Nicholas At Wade	16/05/2018	Outline planning application for the erection of up to 25 houses with all matters reserved

	BIRCHINGTON Kent		
F/TH/17/1145	29 Ethelbert Crescent MARGATE Kent CT9 2DU	16/05/2018	Erection of seven storey hotel (C1 Use Class), comprising 117no. bedrooms, restaurant provision on the ground floor, and basement parking
F/TH/15/1204	Land Adjacent And Rear Of Ashbre Manor Road St Nicholas At Wade BIRCHINGTON Kent	17/05/2018	Erection of 39No. dwellings with formation of vehicular access to Manor Road and associated parking and landscaping
F/TH/18/0291	Bethesda Medical Centre Palm Bay Avenue MARGATE Kent CT9 3NR	07/06/2018	Erection of extensions to enlarge existing medical centre to provide medical and community facilities comprising a two storey extension to front of existing building with alterations to entrance, a two-storey extension to eastern end of building with plant room within roof, installation of solar panels to roof slopes and creation of new pedestrian and vehicular access, together with 46 parking spaces to front and rear and use of adjacent land for the provision of an additional 54 spaces, with associated structures, enclosures and landscaping.
OL/TH/17/1447	Land Adjacent Little Orchard Canterbury Road St Nicholas At Wade BIRCHINGTON Kent	18/06/2018	Outline application for the erection of 30 No dwellings with construction of new access from Manor Road with all other matters reserved
OL/TH/16/0376	Land Rear Of 2 To 28	21/06/2018	Outline application for the erection of 43No. dwellings comprising of 8No. 2-bed flats, 7No. 2-bed dwellings, 25No. 3-bed dwellings and 3No.

	Kingston Avenue MARGATE Kent		4-bed dwellings, including access and scale
F/TH/16/0003	67 - 69 Northdown Road MARGATE Kent CT9 2RJ	13/07/2018	Erection of 4 storey building to accommodate 21No. self-contained flats, and 2no. retail units, with associated landscaping and refuse storage, following demolition of existing building
F/TH/18/0507	Hartdown Academy George V Avenue MARGATE Kent CT9 5RE	17/07/2018	Erection of part two/part three storey teaching block together with single storey extension to sports hall with associated ancillary works and landscaping following demolition of 5 existing buildings.
F/TH/18/0459	Institute Of St Anselms Lonsdale Court Hotel 51 - 61 Norfolk Road MARGATE Kent CT9 2HX	19/07/2018	Change of use to 5No. 4 bed houses, 1No. 3 bed house and 5No. 2 bed flats, together with erection of 1No. 2 bed dwelling, three garages and alterations to the fenestration, following the demolition of the existing front and rear extensions.
R/TH/16/1522	Redhouse Farm Manston Court Road MARGATE Kent CT9 4LE	14/08/2018	Application for approval of reserved matters of outline application OL/TH/15/1256 for the erection of 40no. dwellings
F/TH/18/0790	24 - 27 Marine Terrace MARGATE Kent	22/08/2018	Change of use of part of all floors and erection of 3-storey rear extension and third storey to provide 13no. residential apartments with associated access

	CT9 1XJ		
F/TH/18/0445	3-4 Chatham Place RAMSGATE Kent CT11 7PT	30/08/2018	Change of use of former Working Men's Club (use class D2) into 10No. self contained flats together with alterations to the rear elevation and fenestration
R/TH/18/0699	Land Adjacent 15 Southall Close Minster RAMSGATE Kent	10/09/2018	Application for the approval of appearance/landscaping/scale for the erection of 12 detached dwellings with access via Southall Close pursuant to outline permission OL/TH/18/0122
F/TH/18/0637	Land West Of Invicta Way Ramsgate Kent	20/09/2018	Erection of 2 storey building for manufacturing timber products (use class B2)
F/TH/18/1043	Westwood Gateway Margate Road BROADSTAIRS Kent CT10 2QU	28/09/2018	Variation of condition 9 of planning permission F/TH/06/0237 for the revised Layout for unit C including subdivision to create two retail units and installation of mezzanine floor to provide two units of 735sqm and 1208sqm respectively, being an alternative scheme to that subject of planning permission reference F/TH/04/1653 to allow the sale of all goods excluding food goods in Unit D1
OL/TH/16/1752	Land At Haine Lodge Spratling Lane RAMSGATE Kent CT12 5LL	11/10/2018	Outline application for the erection of 13no. houses (and retention of existing dwelling), with consideration of access on to Spratling Lane, with all other matters reserved
OL/TH/16/1374	St Stephens Haine Road RAMSGATE Kent CT12 5ES	12/10/2018	Application for outline planning permission for 100no. dwellings with creation of access on to Haine Road, and all other matters reserved, on land at and adjoining St Stephens Bungalow

F/TH/18/0549	Lockwoods Yard The Grove Westgate On Sea Kent CT8 8AS	15/10/2018	Erection of part two storey/part three storey/part four storey 1200 sqm extension of light industrial use (Class B1) to the Eastern and Northern perimeters with associated parking and landscaping together with the demolition of the existing paint store.
F/TH/18/0642	8 Beach Avenue BIRCHINGTON Kent CT7 9JS	19/10/2018	Erection of a three-storey building to provide 12No two-bedroom flats with access and parking following demolition of existing bungalow
F/TH/18/0430	Land Rear Of 163 To 173 Pegwell Road RAMSGATE Kent	23/10/2018	Erection of 9No 4 bedroom dwellings and 1No 5 bedroom dwelling with associated parking and access
F/TH/18/1036	Aldi Store Ltd Zion Place MARGATE Kent CT9 1RP	25/10/2018	Erection of building for use as retail foodstore (Class A1) and associated car park, landscaping, service arrangement and altered access following demolition of the existing foodstore.
F/TH/18/1185	Land East Of Columbus Avenue RAMSGATE Kent	21/11/2018	Erection of 18No. general industrial units, associated parking and access road
R/TH/18/0931	St Lawrence College College Road RAMSGATE Kent CT11 7AF	18/12/2018	Application for reserved matters application for the approval of ' layout, scale, landscaping and appearance' for the erection of 166no. dwellings with associated open space and parking provision, with consideration of access and scale, following the demolition of the existing buildings pursuant to outline application OL/TH/15/1303.
F/TH/18/0093	Land On West Side Of	24/12/2018	Erection of 9No. industrial units, together with associated external works

	The Loop Manston Ramsgate Kent		
F/TH/18/1329	139 High Street RAMSGATE Kent CT11 9TY	11/01/2019	Variation of conditions 2, 5, 7 and 8 of planning permission F/TH/15/0087 for the erection of four storey detached building containing 12No. flats following demolition of existing building to allow amendments to layout , alterations to fenestration and roof, and reduction from 12 flats to 11 flats.
R/TH/18/1416	Land Rear Of 2 To 28 Kingston Avenue MARGATE Kent	16/01/2019	Application for the reserved matters to outline permission OL/TH/16/0376 for the erection of 43No. dwellings comprising of 8No. 2-bed flats, 7No. 2-bed dwellings, 25No. 3-bed dwellings and 3No. 4-bed dwellings, for the approval of landscaping, layout and appearance.
F/TH/18/0432	Land Adjacent Birchington Vale Caravan Park Shottendane Road Birchington Kent	16/01/2019	Change of use of land for the stationing of static holiday caravans and associated works
F/TH/18/1424	Land Adjoining 1 Chilton Lane RAMSGATE Kent	24/01/2019	Variation of condition 17 of planning permission OL/TH/16/1416 'Outline application for erection of 14No. detached dwellings including access, layout and scale' to allow amendments to access and layout.
F/TH/17/1662	Margate Football Ground Hartsdown Road MARGATE Kent CT9 5QZ	31/01/2019	Application for the removal of condition 1 of planning consent F/TH/11/0428 The erection of mixed use development, comprising a football stadium, an 80 bed hotel, fitness club, children's club, children's play area, theme bar, conference and banqueting suites, hospitality boxes, admin offices, boardroom for the football club, 10 five a sides & one full size all weather pitch & associated parking and landscaping

F/TH/18/1221	Ivor Thomas Amusements Limited 100 Grange Road RAMSGATE Kent CT11 9PX	06/02/2019	Application for Variation of condition 2 of planning F/TH/15/1297 for the erection of 10No. two storey, 2-bed dwellings with associated parking following demolition of existing office building to allow for external design alterations
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APPENDIX 3: MAJOR PLANNING APPLICATIONS AWAITING DECISION SINCE MARCH 2018

App No	ADDRESS	PROPOSAL
F/TH/18/0568	Land On The West Side Of Nash Court Road MARGATE Kent	Erection of 10No 3 and 4 Bedroom Houses with associated parking
OL/TH/18/0660	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), 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
F/TH/18/1038	The Elms Social	Erection of 5-storey building with part single storey, to accommodate 12No 2-bed

	Club Elms Avenue RAMSGATE Kent CT11 9BD	flats, 2No 3-bed maisonettes and function room (sui-generis) with associated parking and access following demolition of existing club house
F/TH/18/1059	Sportsman Inn 123 Sandwich Road RAMSGATE Kent CT12 5JB	Change of use of the existing public house and surrounding land (use class A4) together with the erection of detached 4 storey building to side area to create 9No 2 Bed flats (use class C3) with offices (class A2) and commercial unit (class A1) and micropub (use A4) at ground floor levels, with associated parking and landscaping
F/TH/18/1053	43 - 49 Marine Terrace MARGATE Kent	Erection of 124 bedroom hotel (use class C1) with associated restaurant/bar, gymnasium, meeting spaces, and rooftop bar together with 1No retail/restaurant (use classes A1/A3) at ground floor following demolition of existing buildings
F/TH/18/1109	14 Suffolk Avenue Westgate On Sea Kent CT8 8JG	Change of use from light industrial (use class B2) to residential (use class C3) including conversion of barrel vault building into 8No. 2 bedroom dwellings together with the erection of 12 no. 2 bedroom and 3No. 1 bedroom dwellings following demolition of the existing office building, showroom buildings and workshop.
OL/TH/18/1213	Jentex Engineering Ltd Canterbury Road West RAMSGATE Kent CT12 5DU	Outline application for the erection of a 3 storey 61 unit extra-care facility, 14No single storey bungalows and 34No two storey dwellings and 8No Maisonettes including access and scale following removal of existing structures
F/TH/18/1407	Land Adjacent Holy Trinity School 99 Dumpton Park Drive BROADSTAIRS Kent CT10 1RR	Application for variation of condition 12(c) attached to planning permission R/TH/17/1144 for the approval of reserved matters (appearance, landscaping, layout and scale) in pursuant to outline planning permission OL/TH/15/0956 for the erection of up to 28no. dwellings with associated access from Cliffside Drive to allow for a change in delivery times during school term times
F/TH/18/1458	Cambay Lodge 91 Kingsgate	Variation of condition 12 and 18 of planning permission F/TH/17/0537 Variation of condition 2 of planning permission F/TH/15/0142 for erection of three storey

	Avenue BROADSTAIRS Kent CT10 3LW	building containing 10no. self-contained flats following demolition of existing building, with formation of parking area to rear to allow alterations to layout and design to include enlargement to north-east elevation at ground, first and second floor, enlargement of second floor to rear to include additional balcony and relocation of four parking spaces to rear boundary to allow removal of obscure glazing and balcony screening
OL/TH/18/1488	Land On The West Side Of Tothill Street Minster RAMSGATE Kent	Outline application for the erection of up to 214no. dwellings, cemetery expansion, and associated access, with all other matters reserved
F/TH/18/1529	The Knot 20 Beach Road Westgate On Sea Kent CT8 8AD	Part retrospective change of use from Public House and the erection of a three storey extension to rear to facilitate conversion into 4No. 1-bed flats, 3No. 2-bed flats, 1No 3-bed flat and 2No 2-bed maisonettes with associated parking, bin and cycle stores.
F/TH/18/1593	16 - 22 Godwin Road MARGATE Kent CT9 2HG	Change of use to Hotel (use class C1) together with the erection of third floor rear extensions and replacement roof
F/TH/18/1655	Fairfield Manor Fairfield Road BROADSTAIRS Kent CT10 2JY	Erection of 2No. five-storey buildings with basement/undercroft parking containing 64 No self-contained flats (49 x 2 bed and 15 x 1 bed) together with new vehicle access from Fairfield Road, associated works and landscaping, following demolition of existing care home.
F/TH/18/1665	25 Osborne Road BROADSTAIRS Kent CT10 2AF	Erection of 2no. 3-storey buildings containing 10no. 2-bed self contained flats, and erection of 1no. 2-storey 3-bed dwelling, with associated parking following demolition of existing building
F/TH/18/1717	Bowling Centre Ethelbert Crescent MARGATE	Erection of a five storey building to accommodate 11No 2 Bed and 4No 3 Bed self-contained flats with associated parking together with altered fire escape route and exit doors via Cliftonville Court following part demolition of existing bowling alley

	Kent CT9 2DY	
F/TH/18/1747	Land East Of Columbus Avenue RAMSGATE Kent	Erection of 35No. general industrial units, associated parking and access road.
F/TH/18/1755	19 Royal Road RAMSGATE Kent CT11 9LE	Erection of 10no. 3-storey 3-bed terraced dwellings and a 2-storey building comprising 4no. 2-bed self-contained flats following demolition of existing buildings together with conversion and external alterations to former chapel to 4no. 2 bed self-contained flats, including insertion of windows and door and erection of canopy to side elevation
F/TH/19/0092	64 Edgar Road MARGATE Kent CT9 2EQ	Variation of conditions 2 and 5 attached to planning permission F/TH/17/0842 for Change of use and extension of former residential home (use class C2) along with the erection of a 5 storey building to create 12 No 2 Bedroomed and 3 No 3 Bedroom apartments and associated works together with the demolition of existing extensions to allow UPVC windows to all side and rear elevations