

The Planning Inspectorate  
Temple Quay House  
2 The Square  
Bristol  
BS1 6PN

**Our ref:** KT/2019/125156/01-L01  
**Registration ID:** 20014004.  
**Your ref:** TR020002  
**Date:** 15 February 2019

Dear Sir/Madam

### **Application for a Development Consent Order for Manston Airport**

Please find enclosed our written representation for the application for a development consent order to develop Manston Airport.

#### **The Role of the Environment Agency**

The Environment Agency has responsibility for protecting and improving the environment, as well as contributing to sustainable development.

Our work helps to support a greener economy through protecting and improving the natural environment for beneficial uses, working with businesses to reduce waste and save money, and helping to ensure that the UK economy is ready to cope with climate change. We will facilitate, as appropriate, the development of low carbon sources of energy ensuring people and the environment are properly protected.

We have three main roles:

We are an **environmental regulator** – we take a risk-based approach and target our effort to maintain and improve environmental standards and to minimise unnecessary burdens on business. We issue a range of permits and consents.

We are an **environmental operator** – we are a national organisation that operates locally. We work with people and communities across England to protect and improve the environment in an integrated way. We provide a vital incident response capability.

We are an **environmental advisor** – we compile and assess the best available evidence and use this to report on the state of the environment. We use our own monitoring information and that of others to inform this activity. We provide technical information and advice to national and local governments to support their roles in policy and decision-making.

One of our specific functions is as a Flood Risk Management Authority. We have a general supervisory duty relating to specific flood risk management matters in respect of flood risk arising from Main Rivers or the sea.

#### **Written Representation**

##### **2.1. Draft Development Consent Order (July 2018)**

In our Relevant Representation we outlined changes and additions required to Requirement 7 (operation environmental management plan) and Requirement 11 (contaminated land and



groundwater) as set out in Schedule 2 of the Draft Development Consent Order to ensure a comprehensive approach to addressing possible land contamination and controlled waters risk on the proposed development site.

We are satisfied that the Applicant has agreed to make these changes and additions.

We can also confirm that we agree with the following Requirements as currently drafted:

Requirement 5 (detailed design of fuel depot)  
Requirement 6 (construction environmental management plan)  
Requirement 13 (surface and foul water drainage)  
Requirement 15 (piling and other intrusive works)

As proposed at the Issue Specific Hearing on 10 January 2019 we request to be consulted as part of the approvals process for Requirements 6 (CEMP) and 7 (OEMP).

### **5.2-1 Environmental Statement**

We accept that the relevant chapters in the ERS covering drainage, groundwater protection and land quality cover the issues we have raised in discussion with the applicant to date in a satisfactory manner for this stage of development.

### **Authorisations**

The applicant may need appropriate authorisations from us in the form of an environmental permit or exemption for the waste activities proposed. We recommend 'twin tracking' of the DCO and permitting process to ensure the two regulatory regimes do not overlap or contradict each other. We recommend that the applicant should contact our East Kent Waste Team to discuss their plans on 0208 47 47 450 or via email at [KSLEastKentWasteTeam@environment-agency.gov.uk](mailto:KSLEastKentWasteTeam@environment-agency.gov.uk) as soon as possible.

We may need to add to or amend the matters set out in this Written Representation as further information is provided throughout the examination.

I hope that these comments are helpful in setting out details to be considered during the examination.

Yours faithfully

**Mrs Jo Beck**  
**Planning Specialist**

Direct dial 0208 474 6713  
Direct email [kslplanning@environment-agency.gov.uk](mailto:kslplanning@environment-agency.gov.uk)