



**Environment, Planning and  
Enforcement**

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**BY EMAIL ONLY**

15 February 2019

Dear Mr MacDonald,

**Re: Application by RiverOak Strategic Partners for an Order Granting  
Development Consent for the upgrade and reopening of Manston Airport  
– Relevant Representation Summary**

In accordance with the Planning Inspectorate Rule 8 letter dated 18 January 2019, the County Council summarises below its Relevant Representation, as submitted on the 8 October 2018.

Highways and Transportation

- The draft Thanet Local Plan - 2031 and its accompanying Transport Strategy must be a material consideration when assessing this application. At present, the Local Plan is given very little weight or consideration within the Transport Assessment<sup>1</sup>.
- At this stage, the approach to transport modelling within the Transport Assessment is not considered to adequately assess future traffic conditions in line with expected growth patterns and infrastructure delivery.
- The proposed masterplan<sup>2</sup> for the Northern Grass Area and wider highway mitigation proposals conflict with the draft Thanet Local Plan – 2031.
- There is a concern that the proposed development will generate a material increase in traffic on already constrained highway links surrounding the site.
- The trip generation and distribution methodology presented in the Transport Assessment are heavily based on assumptions which are not adequately

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<sup>1</sup> RiverOak Strategic Partners (July 2018) *5.2-15 Environmental Statement - Volume 15 - Transport Assessment*

<sup>2</sup> RiverOak Strategic Partners (July 2018) *7.1 Masterplan*

justified or referenced to appropriate 'real world' examples in a number of cases.

- The mitigation strategy should be considered within the framework of the draft Thanet Local Plan - 2031 and its supporting Transport Strategy. The site and junction-specific – rather than strategic – approach to capacity assessment taken in the Transport Assessment is considered inappropriate, resulting in highway mitigation proposals that deliver only partial benefits and which do not align with, or incorporate, the robust, long-term solutions proposed by the Thanet Transport Strategy.

## Heritage Conservation

### *Archaeology*

- Paragraph 9.3.8<sup>3</sup> states that the evaluation results have been used to inform the Environmental Statement. However, it is difficult to see where this is included within the overall baseline provided.
- KCC considers that evaluation of the the Northern Grass Area is necessary to understand the implications of development in that area.
- Table 9-4 refers to a teleconference on the 25 May 2018 with Simon Mason of the KCC Heritage Conservation team. To clarify the position stated in that discussion:
  - 1) KCC accepts, as stated, that the applicant has not been able to access the site for survey and investigation works.
  - 2) A number of areas were not were not tested through trial trenching but had significant geophysical survey results.
  - 3) The proposed masterplan includes an extensive arable area proposed for a contractor's main compound that has not been surveyed or evaluated.
  - 4) There is a need to survey and evaluate the Northern Grass Area, as there remains the potential presence of archaeology of a significance that could require preservation in situ as the desirable outcome.
  - 5) Given the above, a DCO requirement should cover the need to preserve the archaeology, including through adjustment of development parameters as well as covering the necessary stages of evaluation and investigation.
- In consideration of Section 9.8, KCC notes that areas identified for preservation in situ include a WWII anti-aircraft battery, the remains of a Roman enclosure and the barrow cemeteries on Telegraph Hill. Most of the features would potentially be preserved although their significance needs to be highlighted so that they are considered as plans evolve.

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<sup>3</sup> RiverOak Strategic Partners (July 2018) *5.2-1 Environmental Statement - Volume 1: Main Text - Chapters 1-10*

## *Built Heritage*

- Section 9.9 refers to Built Heritage assets within the site. KCC recognises the limitations that access to the site has caused in terms of surveying heritage assets. However, it is difficult to understand what will be unavoidably affected by the proposed development and what may be retained.
- The County Council welcomes the intention to retain the museums and memorial gardens and would support any enhancement opportunities that can be delivered. The connection of these to the built heritage in a holistic way to ensure the historic sense of place of the airfield is recognised and important. Demolition of historic structures should be avoided where possible.

## Noise:

- Chapter 12<sup>4</sup> (para 12.5.8) of the Environmental Statement describes the measures in the Noise Mitigation Plan and one of these is a voluntary quota count system that is welcomed. The Annual Quota Count is 3,028 (this is for noise emissions, not number of movements, between 23:00 and 07:00). In comparison, Gatwick's night noise quota for October 2017 - October 2018 is 8,200 (although 75% of this is for the summer season, operating 23:30 to 06:00). The latest proposed quota allowance at Manston is far lower than the originally proposed figure of 6,000 for the 23:00 - 07:00 period and this reduction is welcomed. The proposed quota equates to approximately 8 quota count points per night and given that the Environmental Statement (para 12.7.40) states the forecast is to handle 7 aircraft during a typically busy night period, this is a reasonable figure (given a QC/1 aircraft would use one of those points).
- The airport, if operational for freighters, is likely to see the noisier aircraft serve it and for this reason QC/4 aircraft are not banned at night. It is appreciated that the proposed operating model for the airport may necessitate these noisier aircraft, but the airport should be responsive to any future complaints about night noise and try to schedule such aircraft sensitively, for example at the start or end of the night period to cause least disturbance.
- The Dwelling Relocation Scheme and Noise Dwelling Insulation Scheme are important offerings to the local community, especially given that many people will have moved into the area since the airport ceased to operate.
- Overall, the Environmental Statement (para 12.7.72) has identified "... *significant adverse effects*" in several areas. It is important to remember that when approaches from the east are in operation, communities to the north east (Whitstable, Herne Bay, etc.) may report noise disturbance, and when departures to the east are in operation communities to the south (Wingham, Eastry etc.) may be disturbed.

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<sup>4</sup> RiverOak Strategic Partners (July 2018) 5.2-2 *Environmental Statement Volume 2: Main Text-Chapters 11-16*

### Biodiversity

- KCC would strongly encourage the applicant to ensure that consideration of biodiversity is also informed by other relevant chapters of the Environmental Statement e.g. air quality, noise and vibration, and traffic and transport.

### Freshwater environment

- As Lead Local Flood Authority, the County Council has been engaged in extensive pre-application discussions with the applicant and the outputs are captured within the Flood Risk Assessment<sup>5</sup>.
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If you require any further information or clarification on any matter in this letter, then please do not hesitate to contact me.

Yours faithfully,



**Stephanie Holt-Castle**

Interim Director of Environment, Planning and Enforcement

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<sup>5</sup> RiverOak Strategic Partners (July 2018) 5.2-8 *Environment Statement Volume 8: Appendices 8.2-9.1 Part 1*