

Paragraph 5.105 of the Airport NPS states:

*“The Secretary of State will **refuse consent** where harm to these other habitats, or species and their habitats, would result, unless the **benefits of the development (including need) clearly outweigh that harm**”.*

In the light of the above, I write to express my grave concern that insufficient weight has been given to the likely environmental and biodiversity affects of the development proposed by RSP at Manston.

I understand that I am not alone in my concerns.

The Kent Wildlife Trust has been frustrated by the unwillingness of the applicant to undertake the necessary surveys of the land likely to be affected.

I attach their report to me, for your information.

Of particular concern to me is the likely pollution from planes traversing at low level the salt marshes of Pegwell and Sandwich bay.

The bay is home to such spectacular bird life that it is designated as a protected area under UK (as a SSSI) and EU (as an SPA) legislation, and is also considered a world “wetlands”.

Under UK legislation, Sites of Special Scientific Interest (SSSI) are sites that are nationally important for plants, animals or geological or physiographical features and are protected by law. The bay is also a National Nature Reserve.

Special Protection Areas (SPA) are strictly protected sites classified in accordance with Article 4 of the EC Birds Directive, which came into force in April 1979. (Thanet Coast & Sandwich Bay SPA)

Ramsar sites are wetlands of international importance designated under the Ramsar Convention 1971.

The bay attracts **internationally important** numbers of turnstone and **nationally important** numbers of waders including ringed plover, golden plover, grey plover and sanderling. The little tern, a species specially protected by law and listed in the Wildlife

and Countryside Act 1981, has bred here in the past and the Sandwich tern is another summer visitor here.

The site is used by large numbers of migratory birds. They migrate here to take advantage of the sheltered shores and the soft unfrozen mudflats that are rich feeding grounds.

The bay contains **the most important sand dune system and sandy coastal grassland in South East England** and also includes a wide range of other habitats such as mudflats, saltmarsh and chalk cliffs.

These areas provide an important landfall for migrating birds and also support large wintering populations of waders, some of which regularly reach levels of **national importance with some internationally important species**, such as, the European golden plover, ruddy turnstone and little tern. The bird interest is centred on the large numbers of waders and wildfowl which use the area in winter and during the spring and autumn migrations.

Dunlin is usually the most common wader present, found particularly on the mudflats where the rich food source also attracts a wide range of other common species such as oystercatcher, curlew and redshank.

Grey plover and sanderling both overwinter in nationally important numbers, whilst ringed plover also occurs in nationally important numbers during migration.

Wildfowl that occur on the site include mallard, shelduck and occasionally Brent geese. Many of the birds use more than one habitat, some for example feed on the mudflats at low tide and then move up to roost on the saltmarsh or grazing marsh. Breeding birds include ringed plover, oystercatcher and little tern (a species specially protected by law under the Wildlife and Countryside Act 1981).

An essential element in the food chain in the fascinating and varied system of life supported in this area is samphire, of the genus *halophyte*.

Halophytes are increasingly seen as being valuable “cleaners” of toxic wastes from contaminated water, due to their particular cellular structure.

Halophytic plants are of special interest because these plants are naturally present in environments characterized by an excess of toxic ions, mainly sodium and chloride.

Several studies have revealed that these plants may also tolerate other stresses including heavy metals based on the findings that tolerance to salt and to heavy metals may, at least partly, rely on common physiological mechanisms. In addition, it has been shown that salt-tolerant plants may also be able to accumulate metals.

Therefore, halophytes have been suggested to be naturally better adapted to cope with environmental stresses, including heavy metals compared to salt-sensitive crop plants commonly chosen for phytoextraction purposes. Thus, potentially halophytes are ideal candidates for phytoextraction or phytostabilization of heavy metal polluted soils and moreover of heavy metal polluted soils affected by salinity. Some halophytes use excretion processes in order to remove the excess of salt ions from their sensitive tissues and in some cases these glandular structures are not always specific to Na⁺ and Cl⁻ and other toxic elements such as cadmium, zinc, lead, or copper are accumulated and excreted by salt glands or trichomes on the surface of the leaves--a novel phytoremediation process called "phytoexcretion".

(Malousaki and Kalogerakis, Department of Environmental Engineering, Technical University of Crete, Polytechnioupolis, Chania, Greece.)

Whilst this is beneficial to the samphire itself, which is therefore capable of surviving, and indeed flourishing, in unfriendly environments, it is not beneficial to the many birds resident in the salt marshes who will rely on the samphire as a valuable source of food.

Airplanes emit particles and gases such as carbon dioxide (CO₂), water vapor, hydrocarbons, carbon monoxide and nitrogen oxides, which are the generally recognised pollutants from the burning of fossil fuel oils in transport generally. However, they also emit sulphur oxides, lead, and black carbon which interact among themselves and with the atmosphere and will build up a plant life as toxic deposits. As we see above, this is most particularly true of samphire.

Samphire so polluted will cease to be a valuable food source for the birds which need it, but will instead become poisonous to them.

I urge the Examining Authority to insist that the Applicant carries out or commissions the requisite surveys in relation to this most precious area and, should such research prove it necessary to safeguard the bays, to ensure that planes will not be permitted to over-fly these areas.

Without this background work, I do not see how the Applicant can expect the Secretary of State to be able to decide in their favour, where such **internationally and nationally important** wetlands and salt marshes have demonstrably been given so little thought and provision for their protection in the course of this application.

Species and Habitats

Kent Wildlife Trust is concerned about the potential negative impact on species and habitats, both on the site itself but also in the immediately surrounding area, which includes a number of sites of local, National, European and International importance for nature conservation. This position has not changed and although there has been further survey, there remains insufficient information to reassure us that there will be no negative impact on these sensitive sites and their associated species.

Noise Mitigation Plan

We are concerned that 'The Noise Mitigation Plan' does not consider in sufficient detail the impacts of specific flightpaths. We would hope to see a further examination on the predicted level of disturbance and pollution that will be caused by the airport proposal at sensitive nearby sites, such as Sandwich and Pegwell Bay.

This new section of the consultation does not provide sufficient information about noise mitigation for potential disturbance and damage to species and habitats in the surrounding area. We note that a community fund to spend fines for individually noisy aircraft and also those that stray from established flightpaths is proposed. Kent Wildlife Trust would advocate a "precautionary approach", rather than one which attempts to compensate after the damage has already been done.

Designated sites and species

It is crucial that it can be demonstrated by the Environmental Statement that this proposal does not have a negative impact upon nearby internationally protected sites, such as Thanet Coast and Sandwich Bay SPA and SAC and its nearby Local Wildlife Sites, which act as supporting sites for associated bird populations; also to other internationally protected sites in the vicinity.

Measures to safely disperse birds and other wildlife from the runways without harm should also be demonstrated, alongside a long-term conservation management plan that can demonstrate how consideration for wildlife can be accommodated alongside the specific requirements for commercial airport land use management.

It is the view of Kent Wildlife Trust that these above matters have still not been adequately considered since the last iteration of statutory consultation, in particular with respect to Sandwich and Pegwell Bay. We defer to RSPB consultation comments and support their concerns over the methodology of the bird surveys undertaken and we add that Kent Wildlife Trust have similar concerns over the methodology and detail of further species surveys including the latest invertebrate survey. As the results of these surveys should be used to inform detailed design and mitigation, we are also concerned about the potential impact upon the Kent priority species brown hare. We would have expected to see further survey and detailed proposals to mitigate for this species.

Biodiversity opportunity

Kent Wildlife Trust would hope to see more detailed proposals that would demonstrate good quality enhancement opportunities for biodiversity. Although this site is just outside the Biodiversity Opportunity Area (BOA), any habitat creation should give consideration to its position on the chalk plateau and a locally-appropriate species planting list for any green spaces within the site itself. The mitigation and enhancement package does not reflect in both scale and detail what we would expect in order to mitigate for the impacts associated with this application (with reference to the Off-Site habitat provision in the c.36ha land parcel1362).

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