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Dear Mr MacDonald

NSIP Reference Name / Code: Manston Airport / TR020002
Natural England's submission for Deadline 7: comments on the Applicant's submissions for Deadline 6

Thank you for the opportunity to comment on the Applicant's submissions for Deadline 6. Natural England would like to comment on the Addendum to the ES Chapter 6 Air Quality [REP6-016], and the Appendices to the Applicant's answers to the ExA's second written questions [REP6-014].

The Examining Authority has also asked for final Statements of Common Ground (SoCG) for Deadline 7. Natural England's SoCG with RiverOak Strategic Partners, submitted at Deadline 4 [REP4-002], contained a number of matters not yet agreed, and set out the further information Natural England had requested regarding bird disturbance, water quality and air quality impacts. The majority of this information has now been submitted. However, Natural England remains in discussion with the Applicant over the conclusions to be drawn from the further information submitted. Therefore, the SoCG will need to be updated once these discussions have been concluded.

Addendum to the Environmental Statement Chapter 6 Air Quality [REP6-016]

Annex 3 of Natural England's deadline 6 submission [REP6-048] set out the further information that we considered essential to enable an assessment of the impacts of air quality on designated sites. These requirements are partially addressed in the Addendum [REP6-016] and have also been discussed with the Applicant's consultants during a telephone conference on 13 May 2019.

Taking each of the requirements in turn:

- a) Updated air quality assessment taking account of the updated transport modelling that has been carried out, and including an in combination assessment of the Process Contributions from the proposal and other plans or projects.

The Addendum [REP6-016] contains an updated air quality assessment, which takes account of Kent County Council's Thanet Strategic Transport Model (TSTM). However, the Addendum does not explicitly include an in combination assessment of the Process Contributions (PC) from the proposal and other plans or projects. Paragraph 4.2.5 of the Addendum states that the PC from other plans or projects have not been calculated because these are insufficiently defined to isolate individual traffic contributions. Instead, the projected future traffic growth is included in the transport model, and included in the Predicted Environmental Concentration (PEC).

Natural England's advice is that the PC from growth associated with the Thanet Local Plan is available, and should be used for the in combination assessment. Presenting the PC from the airport proposal alone, and in combination with the PC from the Thanet Local Plan, as a percentage of the Critical Levels for the designated sites, would provide a transparent audit trail of potential effects. However, adding Local Plan growth at the PEC stage, as presented in the Addendum, may be acceptable, provided that the transport modelling used contains the predicted effects from the Thanet Local Plan. The Applicant's consultants have confirmed, in correspondence to Natural England, that this is the case.

The updated air quality assessment includes annual and daily mean NO_x, but does not consider nutrient nitrogen and acid deposition. Natural England understands that an assessment of nutrient and acid deposition will be submitted by the Applicant at Deadline 7a.

b) Any approved development that has been built since 2015 should be added to the background from APIS.

Paragraph 4.2.7 of the Addendum states that the background data used are the Defra mapped 'NO_x concentrations: Background mapping data for local authorities'¹. The latest maps available are based on 2017 data. Therefore, Natural England advises that any major development (that would have a significant impact on air quality) that has been approved and built since 2017 should be added to the background.

c) Contour plots to clearly show where the Process Contribution of NO_x is more than 1% (or relevant proxy) where the background is at or over 100% of the Critical Level. This should be overlain with habitat data to clearly illustrate the potential effects on designated sites.

Figure 4.5 in Appendix A shows the contour plots of annual mean NO_x PEC overlaid with designated sites. This is an acceptable illustration of the scale of the area impacted.

d) Updated consideration of the impact of NO_x from construction and operation phase effects for years 2, 6 and 20 on designated sites.

This has now been provided. As an updated nitrogen and acid deposition assessment is being provided for Deadline 7a, Natural England will give advice on the conclusions of the updated air quality assessment when the full information is available.

Appendices to the Applicant's answers to the ExA's 2nd written questions

Appendix Ec.2.3 Winter Bird Surveys Report 2018-19 [REP6-014]

Natural England's Written Representation [REP3-089] stated that it was premature to rule out an adverse effect on the integrity of the Thanet Coast and Sandwich Bay SPA, due to potential disturbance to golden plovers. This potential disturbance arises from aircraft noise and bird scaring activities.

The ES [APP-033] noted that potential disturbance from bird scaring activities would be confined to within 1km of the airport boundary, but concluded that there would be no adverse impact on functionally linked land because it was not regularly used by golden plovers. Natural England's Written Representation [REP3-089] advised that, as only one year's survey was available, the following information should be presented to provide support to the conclusions in the ES: the proportion of functionally linked land that would be lost; any reason why not all of the land within the 1km buffer would be suitable for golden plovers (eg fields are too small); and the crop rotation within the 1km buffer (ie how often the land would be suitable for golden plovers).

¹ Available online at: <https://uk-air.defra.gov.uk/data/laqm-background-home>

The 2018-19 Winter Bird Surveys Report [REP6-014] is helpful in providing additional survey data. However, the survey season missed out the beginning of winter. Golden plover numbers are unlikely to be constant on arable land all through the winter as they respond to the farming activities. The peak count in 2016/17 shown on figure 4.5 [REP6-014] was in November, which was missed out in the latest survey. Therefore, Natural England maintains the view that the further information set out in the previous paragraph of this submission is necessary to provide the evidence for the conclusion reached in the ES.

Natural England's Written Representation [REP3-089] also requested noise contour maps to help determine the potential operation disturbance to SPA and SSSI bird species. These maps were provided [REP4-018] and Natural England commented on them [REP6-048]. The additional survey data provided [REP6-014] confirms the general pattern of SPA/SSSI bird use across Pegwell Bay. Therefore, Natural England maintains its view that noise contour maps submitted do not allow an adverse effect on the integrity of the SPA, or significant effects on the SSSI, to be ruled out.

I hope this information is helpful in progressing the Examination.

Yours sincerely

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