

## MANSTON AIRPORT DEVELOPMENT CONSENT ORDER EXAMINATION

### SUBMISSION TO DEADLINE 11:

#### Comments on Information requested by the ExA and received from the Applicant to Deadline 10

#### REGISTER OF ENVIRONMENTAL ACTIONS [[REP8-018](#)]

##### SOCIO- ECONOMIC (2)

1. We respectfully note that the Applicant has acknowledged the risk of Aircraft noise and traffic volumes during operation impacting on employees and customers of local business at Page 77 of its Updated Register of Environmental [[REP8-018](#)].
2. We respectfully draw the Examining Authority's attention to the fact that the Applicant has **not identified or considered measures to avoid, reduce or compensate for any adverse impacts Aircraft noise volumes during operation impacting on employees and customers of local businesses and the town centre of Ramsgate** as an Impact in its Updated Register of Environmental [[REP8-018](#)].
3. We respectfully draw the Examining Authority's attention to the fact that of the traditional town centres within Thanet, Ramsgate Town Centre has the largest turnover of £67m<sup>1</sup>. This has been identified as a **Key Sustainability issue for Thanet**<sup>2</sup>. Most of the town centre of Ramsgate is within the noise contour > 57 dB LAeq 16 hr<sup>3</sup>
4. We respectfully draw attention to the Examination Authority to the body of evidence provided by Interested Parties attesting to and providing evidence of the significant critical adverse Impact of Aircraft noise volumes during operation impacting on employees and customers of local

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<sup>1</sup> Arup (August 2018) Thanet District Council Draft Local Plan to 2031 Sustainability Appraisal – Environmental Report Page 46, Table 13: Key Sustainability Issues for Thanet [REP3-056] and attached for ease of reference.

<sup>2</sup> *Ibid*

<sup>3</sup> MANSTON AIRPORT DEVELOPMENT CONSENT ORDER EXAMINATION SUBMISSION TO DEADLINE 9: Comment on PD-018 - Requirement 9b, Noise Mitigation submitted by Five10Twelve : SUPPLEMENTARY APPENDIX Ramsgate Listed Buildings and Conservation Area within Five10Twelve's Noise Contours (produced by CAA/ERCD) Listed Buildings (black dots) and Conservation Area (grey-shaded) : National Heritage List GIS data

businesses and to the town centre of Ramsgate. These include but are not limited to:

- (a) Love Ramsgate Business Survey (short summary) [[REP5-075](#)]
- (b) Love Ramsgate Business Survey (Full Survey) [[REP7-009](#)]
- (c) Businesses that are noise sensitive and aviation noise would materially affect the business concerned for example, Touring Park, artists, writers, recording studios and artists, designers, well-being, mental health, musicians, care-homes, holiday lets, schools, hotels, regeneration specialists and creative-hubs etc. A number of these businesses provided Relevant Representations to Planning Inspectorate including but not limited to: [[RR-1153](#)], [[RR-1107](#)], [[RR-1795](#)], [[RR-0586](#)], [[RR-1843](#)], [[RR-0922](#)], [[RR-1627](#)], [[RR-0034](#)], [[RR-0286](#)], [[RR-0349](#)], [[RR-0555](#)], [[RR-1982](#)], [[RR-1983](#)], [[RR-1649](#)], [[RR-0677](#)], [[RR-0504](#)], [[RR-1163](#)], [[RR-1213](#)], [[RR-1420](#)], [[RR-0197](#)], [[RR-1047](#)], [[RR-1754](#)], [[RR-0758](#)], [[RR-0163](#)], [[RR-0643](#)], [[RR-0622](#)], [[RR-1400](#)], [[RR-0554](#)], [[RR-0612](#)], [[RR-1498](#)], [[RR-0685](#)], [[RR-1609](#)] [[RR-2035](#)] [[RR-1974](#)] [[RR-0601](#)]
- (d) A number of these businesses have also put in Written Representations including but not limited to: [[REP3-022](#)], [[AS-076](#)] [[AS-152](#)] [[AS-160](#)].
- (e) As of Deadline 9, Five10Twelve and its directors have submitted 110 evidenced submissions.
- (f) As of Deadline 9, Ramsgate Town Council have made 4 submissions at [[AS-141](#)], [[REP1-035](#)], [[REP3-064](#)] and [[REP3-066](#)]
- (g) As of Deadline 9, Ramsgate Coastal Community Team has made one submission [[RR-1625](#)]
- (h) As of Deadline 9, Ramsgate Town Team has made 3 submissions at [[RR-1623](#)] [[AS-193](#)] and [[REP9-XXX](#)]
- (i) As of Deadline 9, Ramsgate Society has made 5 submissions at [[RR-1948](#)] [[REP3-008](#)] [[REP4-060](#)] [[REP4-061](#)] and [[REP4-061](#)]
- (j) As of Deadline 9, Ramsgate Heritage and Design Forum has made 3 submissions at [[RR-1626](#)] [[REP3-017](#)] and [[REP4-063](#)]

- (k) As of Deadline 9, Ramsgate Neighbourhood Plan has made 2 submissions at [RR-1628] and [REP3-075]
- (l) Video Evidence has been submitted to evidence the noise and visual impact of planes travelling (taking off and landing) over Royal Ramsgate Harbour where many of our businesses are located and near the town centre [REP4-087] and [REP4-090]
- (m) A map showing the Listed Buildings and Conservation Area which also shows Ramsgate Town Centre and other areas such as the Arches in which businesses are located was submitted at [\[TR020002-004480\]](#) **most of the town centre is within the noise contour > 57 dB LAeq 16 hr<sup>4</sup>.**
- (n) At submission [\[REP3-056\]](#) evidences the large amount of private inward investment to Ramsgate since the airport closed in May 2014 which will **all be located under the flight path at noise levels of > 57 dB LAeq 16 hr and at risk;** by way of example:
- Wetherspoons (Royal Victoria Pavillion) (2017) a UK Top Employer, £4.5m development (Number of tables just under 350 with large terrace by the beach, covers 900, staff number 200)
  - Albion House (17 bed luxury hotel) (2014) built in 1791 voted The Telegraph's "The 50 Most Romantic Hotels in Europe" - in at number 15 (March 2017), The Times "20 Great hotels for a Weekend away" in at Number 10 (March 2017), The Times "Best Places by the Sea" (Number 26) (May 2016) and Voted No. 1 in Kent in Tripadvisor UK.
  - £27 million development of old Ramsgate police station Cavendish Street and former Magistrate's House (2017/8)
  - A number of restaurants and cafes and shops have opened since the airport closed.

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<sup>4</sup> MANSTON AIRPORT DEVELOPMENT CONSENT ORDER EXAMINATION SUBMISSION TO DEADLINE 9: Comment on PD-018 - Requirement 9b, Noise Mitigation submitted by Five10Twelve : SUPPLEMENTARY APPENDIX Ramsgate Listed Buildings and Conservation Area within Five10Twelve's Noise Contours (produced by CAA/ERCD) Listed Buildings (black dots) and Conservation Area (grey-shaded) : National Heritage List GIS data

5. From the evidence submitted it is clear that a) there will be an Impact; and b) that Impact will be significant and critical jeopardizing the sustainability of Ramsgate and the wider Thanet<sup>5</sup>.
6. In its Updated Register of Environmental [\[REP8-018\]](#) the Applicant has not identified or considered measures to avoid, reduce or compensate for any adverse impacts Aircraft noise volumes during operation impacting on employees and customers of local businesses and the town centre of Ramsgate.
7. Pursuant to Section 104(3) of the Planning Act 2008 the Secretary of State must decide the application in accordance with any relevant national policy statement, except to the extent that one or more of subsections (4) to (8) applies.
8. The Applicant has not provided significant and material information to enable the Examining Authority and the Secretary of State to take into account the proposed development's potential adverse impacts (including any longer term and cumulative adverse impacts) as well as any measures to avoid, reduce or compensate for any adverse impacts (paragraph 4.4 Airport NPS).
9. In this context, environmental safety, social and economic adverse impacts have not been considered at the national, regional and local level (paragraph 4.5 Airport NPS).
10. **We respectfully submit on this basis the Application must be refused.**

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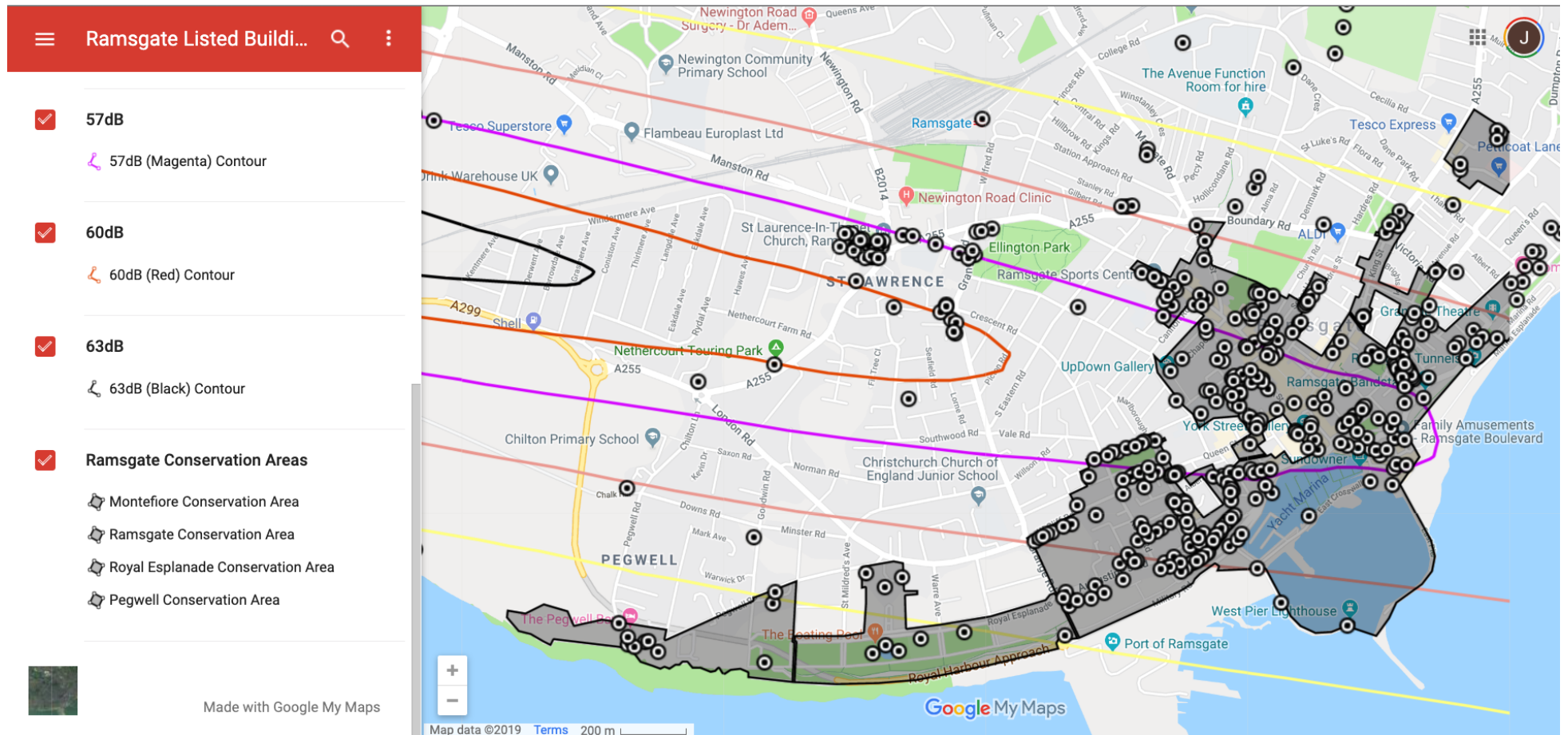
<sup>5</sup> *Ibid*

## MANSTON AIRPORT DEVELOPMENT CONSENT ORDER EXAMINATION SUBMISSION TO DEADLINE 9:

Comment on PD-018 - Requirement 9b, Noise Mitigation submitted by Five10Twelve : SUPPLEMENTARY APPENDIX

Ramsgate Listed Buildings and Conservation Area within Five10Twelve's Noise Contours (produced by CAA/ERCD)

Listed Buildings (black dots) and Conservation Area (grey-shaded): National Heritage List GIS data



Thanet District Council  
**Draft Local Plan to 2031**  
Sustainability Appraisal -  
Environmental Report

REP/228764/003

Issue | August 2018

This report takes into account the particular instructions and requirements of our client.  
It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

Job number 258960-00

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## 8 Key Sustainability Issues for Thanet

The SEA Directive confirms that the Environmental Report should include the following information:

*‘any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC’<sup>54</sup>.*

The examination of policy and baseline characteristics, has allowed sustainability issues to be identified which may influence the emerging Local Plan.

Presented in Table 13 are the Key Sustainability Issues for Thanet. It should be noted that to assist in transparency, sub issues have been included for each of the key issues. These provide an indicator of the particular facet of economic, environmental and societal (the three core elements of sustainability) that the issue is most relevant to. The table proved useful in developing relevant objectives and indicators during SA Stage A4.

54 Annex I (c)



Table 13: Key Sustainability Issues for Thanet.

Key Sustainability Issue	Sub Issue	Description	Validation	Source
ECONOMY	Economic Development	Support for industrial and employment development at key sites within the District.	Existing evidence suggests that Thanet is a net exporter of labour with a workplace ratio of 1.19. Bearing in mind the limitations of the data, further analysis suggests that the workplace ratio could be closer to 1.10.  Currently Thanet has significant out migration of the 16-39 age groups. Our forecasts promisingly suggest that more roles are likely to be created which align with the occupation profile of this younger age group which help to reduce the level of out-migration. Economic development at business Parks such as Manston Park, Eurokent and Thanet Reach along with economic development at employment sites adjacent to the Sandwich corridor expected to be available as services employment land within the Local Plan.  The main demand and growth is coming out of the local market, and therefore should be supported. There is insufficient supply of property to meet this demand. Relatively little interest from companies wishing to relocate to Thanet, or large inward investors.  Priority should be given to allocating land for delivering economic development, protecting sites for industrial and commercial uses where there is a good prospect of employment use, consider upgrading or improving existing sites and working to overcome barriers to delivering sites, including identifying infrastructure planned and necessary to support economic growth. In particular relation to employment land provision, sufficient employment land must be provided through the redevelopment of brownfield land and refurbishment of existing stock, to provide new and flexible employment space.	Thanet DC Corporate Themes, Plans, Policies and Programmes Thanet Local Plan Employment Land Review Experian Economic and Employment Assessment – Thanet District Council, 2012
		Create and maintain local employment opportunities centred on fairly paid jobs.	Thanet has relatively high levels of unemployment, and social and economic deprivation. Thanet's history of economic problems is reflected in a persistently high unemployment rate. Total, unemployment rates increased since 2009, and peaked at 6.4% in February 2012. Figures for 2012 show unemployment to have slightly decreased to 5.6%. There is a significant and increasing gap between the rates of unemployment in Thanet compared to Kent (3.2%), the South East (2.4%) and National (3.75%) <sup>55</sup> averages remains.  There are fewer people with professional jobs in Thanet than in Kent and England.  Skilled trades, caring, leisure and customer service, and other service occupations are more dominant in Thanet than in Kent and South east.	Thanet DC Corporate Themes, Plans, Policies and Programmes Thanet Local Plan Local Futures 2004 Draft Employment Topic Paper
		Development of grant funding packages for firms investing in Thanet.	Thanet is part of the Grow East Kent initiative which includes funding for existing and new start businesses as well as businesses looking to move to area.  Thanet is also part of the East Kent Priority Area for Regeneration	Thanet DC Corporate Themes, Plans, Policies and Programmes Thanet Local Plan
		Ensuring that the strategic future of retail centres supports commercial diversification and capital investment as well as providing a strong revenue stream for Thanet District Council.	Thanet retail centres are considered unattractive investment areas for major retailers due to relative isolation, limited catchment and the current high dependence on larger retail centres outside the Thanet region. However, major changes have occurred since 2000 to the provision of retail floor space in Kent and this has had an impact on expenditure spent outside the Thanet region.  Of the traditional centres. Ramsgate has the largest turnover at £67million	Thanet DC Corporate Themes, Plans, Policies and Programmes Thanet Local Plan
		Supporting regeneration of key areas within the District.	South East Local Economic Partnership (SE LEP) implemented in April 2011 to promote strategic economic priorities and make investments activities to drive growth and local jobs. Investment from the Governments Growing Places Fund includes first round projects across Kent and in Thanet such as 'Live Margate, Kent	Thanet DC Corporate Themes, Plans, Policies and Programmes Thanet Local Plan
	Economic Structure	Ensuring that improving economic prosperity provides benefits to the whole of Thanet focussing regeneration on key wards.	Kent County Council's 'Grow for it East Kent' scheme which is aiming to attract new businesses to locate within the sub-region as well as supporting the start up and growth of indigenous and pre-existing businesses. It is doing this by promoting the area to businesses and also providing support to new businesses and funding to support businesses looking to locate in East Kent.  The Thanet Local Plan identifies four key areas in need of special attention: Margate Old Town Area, King Street in Ramsgate, Upper High Street in Ramsgate and Cliftonville West.  Thanet has poor housing stock with a high proportion of semi-derelict, vacant or homes in a state of poor repair. In addition, there are a high proportion of multiple occupation premises which leads to pressure on parking, nuisance, noise and visual deterioration of houses and gardens.	Thanet DC Corporate Themes, Plans, Policies and Programmes Thanet Local Plan Experian Economic and Employment Assessment – Thanet District Council, 2012

Key Sustainability Issue	Sub Issue	Description	Validation	Source
		Ensuring that existing building stock (particularly redundant buildings) is brought into use for employment where appropriate.	Create and maintain local employment opportunities centred on fairly paid jobs. There is also a dominance of employment in the public sector and whilst this has an important role to play in any economy, it is not a strong driver of growth and wealth creation. With over a third of employees working in the public sector there is a need to balance this to ensure that there is scope for the economy to grow. At 1st April 2011 there were 3,456 empty homes in Thanet. (Source Research & Evaluation Statistical Bulletin "Vacant and empty dwellings - Annual 2010/11" Kent County Council)	Thanet DC Corporate Themes, Plans, Policies and Programmes Thanet Local Plan
		The protection and enhancement of natural assets including Blue Flag status of beaches in support of tourist economy.	Tourism provides a significant contribution to the Thanet local economy and so efforts to maintain natural assets and improve its desirability as a coastal destination are required to strengthen and support future economic growth. Visit Kent data for 2009 indicates that there were 57 million visitors to Kent, with an economic impact of £3.2 billion as well as supporting an estimated 63,000 jobs.	Thanet DC Corporate Themes, Plans, Policies and Programmes Thanet Local Plan Town Centre Retail, Leisure, Tourism and Culture Assessment, 2012
		The protection and enhancement of historic assets.	Scheduled monuments in Thanet include Anglo Saxon Cemeteries and remains at Monkton and Dane Valley, Salinestone Grange, Quex Park Settlements, and various ring ditches and enclosures. There are also significant amounts of listed buildings and conservation areas throughout the district.	Thanet DC Corporate Themes, Plans, Policies and Programmes Thanet Local Plan
		Mobility and access to employment opportunities through provision of sustainable public modes of transport.	Compared to a national average of 25.8% the proportion of Thanet households not in possession of a car or van is 29.8%, the 5th highest in the region. In some of the more deprived wards this is almost double this such as Margate Central (52.4%). Of the working age population 40% travel by private, car, van or motorbike to work. 6% travel by public transport, 9% walk or cycle and 3% work from home. These percentages are all lower than the regional and national (England) averages.	Census 2011.
SOCIAL	Safety	Initiatives leading to greater public safety including appropriate strategies for intervention (Community Wardens, Police Community Support and Secured by Design).	Approximately 91% of the Thanet population feel safe in their homes – the main focus of interest is in Margate Central Ward and Cliftonville West Ward. Local analysis has shown that the streets of Thanet are extremely safe – large areas of Thanet have had no reported crime in two years with only nine of 446 output areas reporting one crime per month. All three town centres are awarded the National 'Safer Shopping Award' with shoplifting and commercial burglary falling year on year.	Thanet DC Corporate Themes, Plans, Policies and Programmes Thanet Local Plan Thanet Crime and Disorder Police Audit 2005-2008
	Housing	Responding the needs and requirements of the current and future housing market. Support the viability of existing residential developments now and in the future.	Over the last decade the housing market and mix of tenure has changed due to the recession and the impacts this has had on house prices. The proportion of households that are rented instead of owned or mortgaged has increased. Likewise, the annual number of housing sales has fallen to a level lower than 1996. This means that because there is currently less demand for housing the potential future requirements may be less than previously anticipated. However, given the long timeframe over which the Local Plan will operate (to 2031) it is quite likely that the housing market will have changed again. Therefore, the Local Plan needs to consider how it can allow flexibility to address potential changes in the future and this flexibility is something that the SA will also consider during the assessment of options and alternatives. The Thanet Private Sector Housing Strategy indicates that the standard of the existing stock is an issue, with the private rented sector being poor in some areas, particularly in Cliftonville.	Thanet DC Corporate Themes, Plans, Policies and Programmes Thanet Local Plan Urban Housing Capacity Study (Kent District council) 2002 Local Housing Needs Study Strategic Housing Land Availability Assessment Strategic Housing Market Assessment
	Mobility	Access to key services and employment opportunities through public transport provision.	The Channel Tunnel Rail Link has benefited the UK as a whole but has led to substantial job losses in the in the cross channel ferry industry. Transport links in Thanet have been historically poor however in recent years a number of transport connections have improved significantly. The recently completed East Kent Access Road (A256) provides a fast connection to the A20/M20 at Dover and to the Port of Dover and Channel Tunnel. The Access Road also links Thanet with other major economic assets such as the Port of Ramsgate and Discovery Park to the UK's main arterial road network in less than 60 minutes. Additionally, the introduction of High Speed 1 rail services in 2009 has reduced commuting from central London to Ramsgate to 76 minutes and Margate to 88 minutes. The local population is well served with public transport connections. Access throughout the district is possible via the Thanet Loop bus service. This covers Margate - Broadstairs - Ramsgate – Margate i.e. all towns/centres of commercial activity	Thanet DC Corporate Themes, Plans, Policies and Programmes Thanet Local Plan

Key Sustainability Issue	Sub Issue	Description	Validation	Source
	Deprivation	Levels of economic disparity within the region and need to maximise opportunities for all sectors of society. Access to employment opportunities identified as an issue in limiting the realisation of Thanet's potential.	The 2010 Office of National Statistics Indices of Deprivation indicates that Thanet is ranked the most deprived District in Kent and 65 <sup>th</sup> in England (out of 354), moving it within England's top 20% deprived Districts in England in all 6 deprivation categories (employment, health deprivation, disability, educational skills and training, housing, geographical access to services and income). Per ward Margate is ranked the most deprived Ward  Thanet is within the top 20% most deprived areas of Kent. 15.2% of the District's population are separated or divorced in comparison to the England and Wales average being 11.7% - this is the highest rate in Kent.	Thanet DC Corporate Themes, Plans, Policies and Programmes Thanet Local Plan
	Health	Maintenance of high levels of healthcare provision including dependent sectors of the community.  Population demand on healthcare and support services (PCT initiatives).	The poor health of Thanet cannot just be attributed to the number of older residents of people suffering a limiting long term illness. This ranks highest in the region (of 67) and is 37 <sup>th</sup> of the 376 Districts in England and Wales.	Census 2011.
	Education and Skills	Access to skills development for all sectors of society. Particular demand associated with transient and dependent sectors of society.	39% of East Kent's children's homes providing care for socially excluded children are located in Thanet. A large proportion of children remain in the area through to adulthood compounding a dependency culture.  Within Thanet 15.9% of 16-60 year olds have low or very low literacy (15% nationally) and 35.1% have low or very low numeracy (33% nationally)  It is well evidenced that the district has a number of skills gaps. Thanet's qualification profile is skewed towards NVQ1, 2 and 3, with all three above the county, region and UK. Promisingly it has proportionally fewer individuals with no qualifications (8.6%) this is compared to Kent at 11.4 per cent and the UK as a whole 12.2 per cent. However, in terms of NVQ level 4, which is equivalent to degree level qualification, the district has proportionally far fewer residents that hold this qualification than the county, region and UK. In the South East over a third (39.7 per cent) are NVQ level 4 or above compared to 31.4 per cent in Thanet.	Thanet DC Corporate Themes, Plans, Policies and Programmes review and baseline, South East Regional Integrated Regional Framework, Thanet Statement of Community Involvement Experian Economic and Employment Assessment – Thanet District Council, 2012
ENVIRONMENT	Perceptions and Image	Need to maintain the appearance, vitality and safety of the street scene within Thanet particularly associated with town centres and coastal areas.	With their competing catchment areas Thanet's towns have struggled to retain a vital commercial core and have lost many visitor attractions resulting in the stock of guest house and hotels being reduced and converted to private residential multiple user accommodation. However, this is starting to change particularly within Old Town in Margate and Marina in Ramsgate, but in some areas of public realm the main high streets are of a poor standard.	Thanet DC Corporate Themes, Plans, Policies and Programmes review and baseline, South East Regional Integrated Regional Framework, Thanet Statement of Community Involvement NLP Report
	Biodiversity	Protection of designated sites including; SSSIs, SPA and Ramsar site.	The Thanet coast is protected by a number of international and national conservation and biodiversity designations. These include Special Protected Areas, a Ramsar Site and Sites of Special Scientific Interest. A full list of designations made on biodiversity grounds are given in Appendix C.  Threats to rare species of birds and the Chalk Reefs are a particular concern.	Thanet DC Corporate Themes, Plans, Policies and Programmes review and baseline, South East Regional Integrated Regional Framework, Thanet Statement of Community Involvement, Kent Biodiversity Action Plan.
	Development Pressure	Threat to areas of high wildlife, conservation and biodiversity importance from economic and social development	Development within the Thanet District presents areas of conservation and wildlife importance at threat. This is particularly evident in areas of 'coastal squeeze' where space for development is at a premium. Also the need for open space for recreational needs places additional pressures on designated areas.  The impact of changes to air quality resulting from this development should also be considered.  Where possible opportunities to link and extend wildlife habitats to reduce the impact of inappropriate development should be supported. In doing so it is important to make provisions for general green space and green infrastructure in association with development needs	Thanet DC Corporate Themes, Plans, Policies and Programmes review and baseline, South East Regional Integrated Regional Framework, Thanet Statement of Community Involvement, Kent Biodiversity Action Plan.
	Coastal Management	The coastal areas of Thanet have a high conservation and landscape value and should be afforded appropriate protection.	The chalk reefs in themselves justify the need to afford significant management in the protection of the coastal area. In particular threats include; increasing pressure on coastal resources from recreational use, the potential impact of coastal flood defence construction, the impact of coastal erosion, impact from urbanisation and the threat to species of regional, national and international importance, such as the turnstone.  Groundwater Source Protection Zones exist across the district.	Thanet DC Corporate Themes, Plans, Policies and Programmes review and baseline, South East Regional Integrated Regional Framework, Thanet Statement of Community Involvement, Kent Biodiversity Action Plan.

Key Sustainability Issue	Sub Issue	Description	Validation	Source
	Water Quality	Risk to water quality	The whole of the Thanet area is classified as a Nitrate Vulnerable Zone. Furthermore nutrient runoffs may impact on inter tidal chalk reefs.	Thanet DC Corporate Themes, Plans, Policies and Programmes review and baseline, South East Regional Integrated Regional Framework, Thanet Statement of Community Involvement, Kent Biodiversity Action Plan. Environment Agency mapping
	Climate Change and Flood Risk	Nation need to consider impacts associated with climate change and particular imperative within coastal locale. Risk of flooding must be considered in Local Plan development.	Thanet has a key advantage as flood risk does not pose a constraint to identifying sufficient housing site, commercial or industrial site opportunities.	Thanet DC Corporate Themes, Plans, Policies and Programmes review and baseline, South East Regional Integrated Regional Framework, Thanet Statement of Community Involvement, Kent Biodiversity Action Plan, Environment Agency