Date: 31 January 2020

Our ref: 306180 Your ref: TR020002

The Manston Airport Case Team National Infrastructure Planning The Planning Inspectorate Temple Quay House Temple Quay Bristol BS1 6PN

BY EMAIL ONLY



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Dear Manston Airport Case Team

Application by RiverOak Strategic Partners Limited ("the Applicant") for an Order granting Development Consent for the reopening and development of Manston Airport in Kent.

## Request for comments and further information

Thank you for your consultation on the above dated 17 January 2020 which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

## **Habitats Regulations Assessment**

The Secretary of State (SoS) requested that the Applicant provide an updated air quality assessment informed by the Applicant's original Transport Assessment which excludes the Manston-Haine link road. Further, the SoS requested that the updated air quality assessment should be prepared in consultation with Natural England.

Natural England can confirm that the Applicant's consultants, Wood plc, have prepared an updated air quality assessment that follows our advice on the approach to the in combination assessment. Therefore, if the Applicant wishes to rely on the original transport assessment (without the Manston-Haine Link Road), then Natural England agrees with the conclusions set out in the updated air quality assessment (Wood, January 2020), regarding the absence of an impact on the integrity of the Sandwich Bay Special Area of Conservation (SAC) or the Thanet Coast and Sandwich Bay Ramsar site, alone or in combination with other plans or projects.

## **Late Representations**

Natural England wishes to make the following comment in relation to the submission by Five10Twelve (dated 27 October 2019), and in response to point 23 in the SoS's request for comments.

Natural England's comments on the RIES [REP10-007] were based on the noise contour maps produced by the Applicant [REP4-018]) and on the assessment contained in the Appendices to the Applicant's Answers to the 4th Written Questions, Appendix Ec.4.2: North Pegwell Bay: Noise and

Turnstone [REP9-010]. As noted in Five10Twelve's letter (27 October 2019), Natural England's conclusions regarding noise impacts on the features of the Thanet Coast and Sandwich Bay SPA/Ramsar were based on the Applicant's assertion (in [REP9-010]) that the flightpaths would be similar to those used by the previous Manston Airport, and at least no closer to Pegwell Bay than previously. Five10Twelve's letter (27 October 2019) implies that a different set of assumptions has been used to calculate impacts on human receptors.

Natural England's principle concern at this stage is that the Report on the Implications for European Sites (RIES) is based on the same assessments and assumptions that the rest of the DCO application documents are based on, and that these represent the most realistic 'worst case' development scenario (i.e. following the precautionary approach required by the Habitats Regulations). We note that the letter submitted by Five10Twelve, dated 27 October 2019, calls this into question.

Yours sincerely

Alison Giacomelli Sussex and Kent Area Team