

To: Secretary of State for Transport  
% Planning Inspectorate,  
National Infrastructure Planning

Date: 19 November 2021

Our Ref: SoS/R/016

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**For the attention of the Manston Airport Case Team**

- A. This submission is in response to the SoSFT's letter of 21 October 2021 and specifically paragraph 6.
- B. We submit our comment to the First Round of Consultation herewith as a formal consultation response to the Second Round of Consultation.
- C. Our comment is in response to the Applicant's submission [[TR020002-005769](#)] (For ease of reference we will be following the Applicant's numbering).
- D. **In response to the Applicant's submission [[TR020002-005769](#)] - Page 3, Paragraph 7 and In response to the Applicant's submission known as Annexe 5 [[TR020002-005767](#)] : Corn Bunting and Rare Invertebrate Species**
- We disagree with the conclusions reached by the Applicant in the Applicant's submission [[TR020002-005769](#)] - Page 3, Paragraph 7.
  - We respectfully remind the Secretary of State that at Annexe 5 [[TR020002-005767](#)] the Applicant's own expert draws the following conclusion:
    - Page 14, para 5.1.1 Breeding Bird Survey Conclusion

*"... The Site does however support numbers of corn bunting that are likely to be of **importance in terms of the county (Kent) population, and locally important numbers of breeding ringed plover, skylark and grey partridge**<sup>1</sup>"* (bold added for emphasis).

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<sup>1</sup> Page 14, Para 5.1.1 Breeding Bird Survey Report 2020 Available online at:  
<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-0>

- We respectfully remind the Secretary of State that:
  - *“Corn bunting is a SPI and is BoCC Red listed due to the long-term decline in its breeding population in the UK... Corn bunting is described as a widespread but decreasing resident in the south, east and north of Kent and is therefore **listed as a species of conservation concern in Kent...**”<sup>2</sup>.*
  - *“The nine territories located within the Study Area in 2020 represent 1.5-2.3% of the estimated county population and are therefore **clearly of importance at a county level**”<sup>3</sup> (bold added for emphasis).*
- We disagree with the conclusions reached by the Applicant in the Applicant's submission [\[TR020002-005769\]](#) - Page 3, Paragraph 7.
- We respectfully remind the Secretary of State that at Annexe 5 [\[TR020002-005767\]](#) the Applicant's own expert draws the following conclusion:
  - Page 50, para 5.1.2 Invertebrate Survey Conclusion  
***“The presence of large populations of several very rare invertebrate species, as noted in Section 4.5, raises the conservation value of the Site...suggests that the Site should be treated as of high importance for these rare species”<sup>4</sup>*** (bold added for emphasis).

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[05767-Applicant's%20Submission%20for%20the%20re-determination%20of%20the%20Manston%20Application%20\(Annex%205.%20Appendices%20A%20and%20B\).pdf](#) (accessed 19 November 2021)

<sup>2</sup> Page 13, Para 4.1.16 Breeding Bird Survey Report 2020 Available online at:

[https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-005767-Applicant's%20Submission%20for%20the%20re-determination%20of%20the%20Manston%20Application%20\(Annex%205.%20Appendices%20A%20and%20B\).pdf](#) (accessed 19 November 2021)

<sup>3</sup> Page 13, Para 4.1.7 Breeding Bird Survey Report 2020 Available online at:

[https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-005767-Applicant's%20Submission%20for%20the%20re-determination%20of%20the%20Manston%20Application%20\(Annex%205.%20Appendices%20A%20and%20B\).pdf](#) (accessed 19 November 2021)

<sup>4</sup> Page 50, Para 5.1.2 Invertebrate Survey Report 2020 Available online at:

[https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-005767-Applicant's%20Submission%20for%20the%20re-determination%20of%20the%20Manston%20Application%20\(Annex%205.%20Appendices%20A%20and%20B\).pdf](#) (accessed 19 November 2021)