

Response to report by Arup (Part 3)

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

Save Manston Airport association (SMAa) has over 3,700 members who are in full support of the Development Consent Order to reopen Manston Airport, many wanting jobs for themselves, their family or other Kentish people. Thus, we wish to make further representations to assist in the re-determination of the DCO.

1.0 Introduction

The Manston Development was accepted for Examination on 14th August 2018 and on 11th December 2018 the Ex.A outlined the Principal Issues. At that time Stone Hill Park (SHP) owned the land and, quite rightly, the Ex.A identified Need as a principle issue because for Compulsory Acquisition the development has to prove that there is a compelling case in the public interest.

However, the Applicant successfully purchased the site from the previous owners. SHP, before the conclusion of the Planning Inspectorates Examination. SHP stated that they with immediate effect withdrew all their objections to the DCO. That would suggest that all their “evidence” including the reports that they commissioned would be struck from the record before the Inspectors compiled their assessment and report.

Of course, it's common knowledge, and on the written record, that this didn't happen. The Inspectors continued to lean on SHPs oral and written evidence, putting undue weight upon the Compulsory Acquisition of the site. They thus compiled their lengthy report, and arrived at a conclusion that overall, they did not support the DCO Application. It was almost as if that section of the report had been written before the purchase took place.

However, with the Applicant owning 98% of the land, the emphasis on need changes. The Stansted Airport Appeal Decision, 26th May 2021, is an important guide:

“MBU[Making Best Use] builds upon the APF[Aviation Policy Framework], again referencing work undertaken by the Airports Commission which recognised the need for an additional runway in the Southeast by 2030 but also noted that there would be a need for other airports to make more intensive use of their existing infrastructure. On this basis, MBU states that the Government is supportive of airports beyond Heathrow making best use of their existing runways.

There is no requirement flowing from national aviation policy for individual planning applications for development at MBU airports, such as Stansted, to demonstrate need for their proposed development or for associated additional flights and passenger movements.”¹

The Manston Development will Make Best Use of an existing runway and is in the Southeast so is consistent with government policy and the statement above applies to Manston. **There is no requirement for the Manston Development to demonstrate Need.** As such we assume that section 104 of the 2008 Planning Act applies:

“In deciding the application, the Secretary of State must have regard to (d) any other matters which the Secretary of State thinks are both important and relevant to the Secretary of State's decision.”

¹ Stansted Airport Decision

Additionally, the Secretary of State must be satisfied that the benefits of the development outweigh the adverse impacts of it. (Subsection 7).

2.0 Government Intentions

2.1 The Secretary of State (SoS) original Decision Letter

In his original decision letter, part of section 20 states:

“The Secretary of State concludes that significant economic and socio- economic benefits would flow from the Development to Thanet and East Kent as well as more widely including employment creation, education and training, leisure and tourism, benefits to general aviation and regeneration benefits.”

Astonishingly Arup have completely ignored this clear indication from the SoS that these matters were *“both important and relevant to the Secretary of State’s decision”*.

SMAa and many others sent in representations outlining the significant benefits that the Manston Development would bring. For these to be ignored by Arup is unforgivable considering the importance the SoS attaches to them.

2.1 The “Levelling Up” agenda

In March 2021 the government released a policy paper “Build Back Better: our plan for growth”² and highlighted that there were inequalities in opportunities throughout the country. To address this, they state that:

“Our Plan for Jobs will support new opportunities in every part of the country, while our Lifetime Skills Guarantee will enable anyone to acquire the skills to do those jobs, wherever they live and whatever their stage of life.”

It continues:

“Above all, we will embrace the instincts and know-how of the wealth creators, those in the private sector who invest money and take risks on new ideas that lead to new jobs, new industry and some of the greatest advances humanity has ever known.”

*“Support investment through the new UK Infrastructure Bank which will ‘crowd-in’ private investment to accelerate our progress to net zero, helping to level up the UK. **This will invest in local authority and private sector infrastructure projects**, as well as providing an advisory function to help with the development and delivery of projects.”* (Our emphasis).

In September 2021 the government announced³ that:

“The Ministry of Housing, Communities and Local Government will become the Department for Levelling Up, Housing and Communities as the government delivers on its central mission to level up every part of the UK.”

² Build Back Better: our plan for growth.

³ Government press release – Levelling Up agenda

The Prime Minister stated:

“This government is committed to uniting and levelling up every part of the UK and I am determined that as we build back better from the pandemic we are geared up with the teams and expertise to deliver on that promise.”

This clearly reinforces the fact that this emerging policy is very important to the government and must have a bearing on the Manston Development DCO decision.

3.0 The role Manston will play in Levelling Up

In our submission to Matter 1 section 2 we outlined in detail the benefits that the Manston Development would bring to Thanet and the surrounding area. However, the significance does not seem to have been appreciated by Arup.

3.1 Unemployment

Thanet is an area of the country that is heavily reliant on tourism and the uncertain employment that accompanies it. Much of the work that is available is part-time, zero-hours or gig economy and the very nature of the reliance on tourism means that much work is only available for a part of the year.

One in ten adult males and one in sixteen adult females in Thanet were unemployed in September 2021; in total 6375 people were out of work that month, 7.9% of the population.⁴ These are the highest rates in Kent; an unenviable record that is repeated every month. 9% of the workforce are in the care and leisure sector with a further 11% in sales and customer service; neither particularly well paid nor recognised as highly skilled (even though they often are).

There are 18,325 Universal Credit claimants for Thanet across all categories, including those in work, as of September 9.

As outlined in previous submissions, the Applicant has commitments within the DCO to employ local people and provide them with the necessary qualifications and skills to gain employment. This will inevitably reduce unemployment and the numbers on Universal Credit in Thanet. This is in full accord with the government’s Levelling Up agenda.

3.2 Deprivation

When talking about deprivation, the Southeast of England doesn’t immediately come to mind; after all surely the Southeast is the richest part of the country? Of course, this isn’t true; Kent is more than its constituent parts and whilst Sevenoaks and Tunbridge Wells are indeed affluent, Thanet is not.

“Thanet continues to rank as the most deprived Local Authority in Kent”.⁵

⁴ https://www.kent.gov.uk/__data/assets/excel_doc/0019/61750/District-unemployment-level-Kent.xlsx#:~:text=Thanet%20has%20the%20highest%20unemployment,lowest%20unemployment%20rate%20at%203%25.&text=Thanet%20has%20the%20highest%2018,the%20South%20East%20at%2011.4%25.

⁵ Indices of Deprivation headline findings 2020

The English Indices of Multiple Deprivation (IMD) give all the necessary data and analysis needed to show the true picture. The most recent IMD was published 26th September 2019.⁶

England is divided into 32,844 Lower Super Output Areas (LSOA) and Thanet has 77 LSOAs:

- Seven of the seventy-seven LSOAs (9%) featured in the top one thousand worst LSOAs in England
- Eleven (14%) had an IMD Decile of 1
- Forty-four (57%) had an IMD Decile between 2 and 5
- Only one LSOA had an IMD Decile of 10; none had a Decile of 9
- So, 81% of Thanet LSOAs had an IMD Decile of 5 or less.

The Manston Development will not only reduce unemployment locally but the knock-on effect of the huge investment to the area will help to reduce levels of deprivation in the area. The government Levelling Up agenda is focussed on removing inequalities within the UK and by granting the DCO for Manston it will enable Thanet to prosper and as a result reduce deprivation significantly.

3.3 The Link between deprivation and Health

“In England there is a systematic relationship between deprivation and life expectancy, known as the social gradient in health. Males living in the least deprived areas can, at birth, expect to live 9.4 years longer than males in the most deprived areas. For females the gap is 7.4 years.”⁷

The life expectancy of many residents in the most deprived areas of Thanet will be considerably lower than those living in the rest of Kent.

However, it is not just life expectancy that is influenced by deprivation.

“The gap in healthy life expectancy at birth is stark. In 2015-17, people in the least deprived areas could expect to live roughly 19 more years in good health than those in the most deprived areas. People in the most deprived areas spend around a third of their lives in poor health, twice the proportion spent by those in the least deprived areas.”⁸

Unfortunately, Thanet not only has high levels of deprivation resulting in large numbers in poor health, but it suffers, like many coastal areas, from failing to attract sufficient doctors and other essential medical professionals.

“All practices in an under-doctored seaside town in Kent have restricted new patient registrations due to concerns over patient safety.

Five practices in Ramsgate [in Thanet] are refusing new patients and redirecting them to the local CCG – which then assigns them to a practice that has capacity – after struggling to attract staff for a number of years.

Local commissioners said recruitment of GPs ‘remains a significant challenge for Thanet’s GP practices’ and that the CCG is supporting practices to develop new models of care.”⁹

⁶ Indices of Deprivation 2019

⁷ The Kings Fund – inequalities in Life Expectancy

⁸ The Kings Fund – inequalities in Healthy Life Expectancy

⁹ Pulse – practices in crisis

“Thanet GP shortage fourth worst in England as doctor warns of 'impossible and dangerous' situation.”¹⁰

As a result, the local hospitals and medical practices are overstretched and it is much harder for the people who desperately need medical help, including those with mental health problems, to obtain the treatment they require.

It is clear that Thanet would benefit incredibly from the granting of the DCO for Manston by reducing unemployment and deprivation which in turn will improve health outcomes. However, as Thanet becomes a more attractive place to live with the huge boost to the local and regional economy, it will be easier to attract health professionals to the area which will make a huge difference to both the local hospitals and the GP surgeries that have been under enormous strain for years.

If the government are serious about Levelling Up for the whole country, then Thanet must be included. The Manston Development will be privately funded so this half a billion investment in Thanet, whilst being fully supportive of Government policy on levelling up, will not involve public money. This must strengthen the case for the airport.

3.4 Educational attainment in Thanet.

Thanet has a high level of residents with either no qualifications or qualifications equal to 1 or more GCSE at grade D or below the national average.

This can be seen from the following two tables. The first uses information obtained from the 2011 census¹¹ so, although not up to date, is the most recent such data available. The second table gives more recent data obtained from ONS for 2020.¹²

QUALIFICATION	THANET	KENT	ENGLAND
No Qualifications	28.4%	22.5%	22.5%
Level 1	14.8%	14.7%	13.3%
Level 2	16.4%	16.9%	15.2%
Apprenticeship	3.9%	3.8%	3.6%
Level 3	11.3%	12.3%	12.4%
Level 4	19.6%	24.7%	27.4%
Other	5.6%	5.1%	5.7%

Qualifications (Jan 2020-Dec 2020)				
	Thanet (Level)	Thanet (%)	South East (%)	Great Britain (%)
NVQ4 And Above	21,700	26.5	45.1	43.1
NVQ3 And Above	43,200	52.8	63.8	61.3
NVQ2 And Above	58,600	71.7	80.5	78.1
NVQ1 And Above	70,100	85.8	90.2	87.7
Other Qualifications	#	#	5.0	5.9
No Qualifications	7,500	9.2	4.8	6.4

Source: ONS annual population survey
Sample size too small for reliable estimate (see definitions)
Notes: For an explanation of the qualification levels see the definitions section.
Numbers and % are for those of aged 16-64
% is a proportion of resident population of area aged 16-64

¹⁰ Kent online

¹¹ 2011 Census - Thanet

¹² ONS annual population survey

Although anecdotal, it is nonetheless the experience of SMAa members, some of whom are teachers and most who are parents, that there is negligible graduate level employment in Thanet. This means that even if local children obtain these higher qualifications, they either commute long distances with the associated costs or are forced to leave the area with the subsequent loss to the area of their valuable skills. This all affects the aspiration of students who often express the feeling “what’s the point?”.

The Manston Development will give real hope to the community and help raise aspirations. According to Ramsgate Active Education Foundation:

“RSP has been a breath of fresh air and have become one of our closest partners. The values of the individuals within their management team and the culture of the organisation as a whole are aligned to our own vision. This is to create aspiration and ultimately improve the prospects of youngsters within our district.”¹³

We urge the SoS to grant the DCO so that RSP can continue to support the fantastic work being done in the community and to raise the aspirations of so many.

3.5 Average Wages in Thanet

A combination of lack of opportunity, lack of aspiration and lack of qualifications plus, as stated earlier, the fact that much of the work that is available is part-time, zero-hours or gig economy and the very nature of the reliance on tourism, which is seasonal, means that wages in Thanet are generally lower than the national average.

Thanet has 20% fewer Higher and Intermediate managerial, administrative or professional households than the national average. From the 2011 Census:¹⁴

GRADE	THANET	KENT	ENGLAND
AB	15.88%	22.42%	22.96%
C1	29.38%	31.89%	30.92%
C2	23.59%	22.46%	20.64%
DE	31.14%	23.22%	25.49%

From the most recent ONS data:

Earnings by place of residence (2021)

	Thanet (Pounds)	South East (Pounds)	Great Britain (Pounds)
Gross Weekly Pay			
Full-Time Workers	560.3	660.1	613.1
Male Full-Time Workers	575.0	709.1	655.5
Female Full-Time Workers	528.4	584.6	558.1
Hourly Pay - Excluding Overtime			
Full-Time Workers	14.60	16.97	15.65
Male Full-Time Workers	14.68	17.91	16.26
Female Full-Time Workers	14.47	15.65	14.86

Source: ONS annual survey of hours and earnings - resident analysis
Notes: Median earnings in pounds for employees living in the area.

¹³ Ramsgate Active Education Foundation

¹⁴ 2011 Census - Thanet

The average Gross Weekly wage for a full-time worker in Thanet is 15% lower than the equivalent average for the Southeast and 9% lower than the national average.

Employee jobs (2020)				
	Thanet (Employee Jobs)	Thanet (%)	South East (%)	Great Britain (%)
Total Employee Jobs	42,000	-	-	-
Full-Time	26,000	61.9	67.3	67.9
Part-Time	16,000	38.1	32.7	32.1
Employee Jobs By Industry				
B : Mining And Quarrying	0	0.0	0.0	0.2
C : Manufacturing	3,000	7.1	6.3	7.9
D : Electricity, Gas, Steam And Air Conditioning Supply	100	0.2	0.4	0.5
E : Water Supply; Sewerage, Waste Management And Remediation Activities	200	0.5	0.7	0.7
F : Construction	2,500	6.0	5.8	4.8
G : Wholesale And Retail Trade; Repair Of Motor Vehicles And Motorcycles	7,000	16.7	15.4	14.9
H : Transportation And Storage	1,500	3.6	4.6	5.1
I : Accommodation And Food Service Activities	4,000	9.5	7.3	7.2
J : Information And Communication	1,000	2.4	6.1	4.5
K : Financial And Insurance Activities	800	1.9	3.0	3.5
L : Real Estate Activities	600	1.4	1.8	1.8
M : Professional, Scientific And Technical Activities	2,250	5.4	8.9	8.7
N : Administrative And Support Service Activities	2,000	4.8	8.1	8.8
O : Public Administration And Defence; Compulsory Social Security	1,250	3.0	3.3	4.6
P : Education	5,000	11.9	10.3	9.0
Q : Human Health And Social Work Activities	8,000	19.0	12.9	13.6
R : Arts, Entertainment And Recreation	1,000	2.4	2.7	2.2
S : Other Service Activities	700	1.7	2.2	1.9

Source: ONS Business Register and Employment Survey : open access
 - Data unavailable
 Notes: % is a proportion of total employee jobs excluding farm-based agriculture
 Employee jobs excludes self-employed, government-supported trainees and HM Forces
 Data excludes farm-based agriculture

The data shows that nearly 40% of those employed in Thanet are in part time work and is 5.4% above the value for the Southeast and 6% above the national average.

It is not in doubt that airports are a major employer of people, and the Manston Development will be no exception. The effect of granting the DCO will be to increase the percentage of those in full time employment and, with the high skill jobs available, it will increase the percentage of higher and intermediate managerial, administrative, or professional households. This in turn will raise the average gross weekly wage in Thanet and the surrounding area.

With more people in Thanet with “disposable income” the whole area will benefit as this money is spent in the community. We feel this strengthens the case for the Manston Development and urge the SoS to grant the DCO.

4.0 Adverse Impacts of the development

It is our firm belief, based on the evidence that the adverse impacts of the development have been grossly exaggerated by those opposed to the opening of the airport.

Unlike LC and Arup, we have outlined in detail in our submissions, particularly the one submitted concerning Matter 3, why the Manston Development will not have a significant effect on the global climate and in summary:

“The development, even without mitigation, represents a tiny proportion of the overall UK GHG emissions and a tiny proportion of the total passenger and cargo ATMs in the UK. With mitigation measures implemented, through the Carbon Minimisation Action Plan, the Proposed Development’s effect on the global climate is not significant. With aeroplane operators obliged to offset all CO₂ emissions caused by International Flights, the granting of the DCO for Manston is not at odds with the recommendations by the CCC in the sixth carbon budget.”¹⁵

It is important to note that the Applicant has employed Wood Environment & Infrastructure Solutions UK Limited who are part of Wood PLC who “with 40,000 professionals, across 60 countries, we are one of the world’s leading consulting and engineering companies operating across Energy and the Built Environment.”

In their “Updated Register of Environmental Actions”¹⁶ and Commitments produced by Wood for the Applicant, it summarises the committed measures within the chapters of the Environmental Statement (RS) and associated appendices. Where relevant, cross-references are provided to the “Requirements” that will secure the Commitments in the DCO.

However, we want to address a couple of issues that are often raised by those opposed to the Manston Development.

4.1 Particulate Matter – P2.5

This issue has been raised many times in relation to Manston by those opposed to the development.

There is no doubt that PM2.5 poses a serious health risk. In a report produced for the Mayor of London it stated “Based on current evidence PM2.5 is thought to be the air pollutant which has the greatest impact on human health”¹⁷.

Main local sources of PM2.5 in London:

- 1st Road Transport at 30%
- 2nd Biomass burning (including domestic woodburning) at 16%
- 3rd Construction at 15%
- 4th Cooking (including commercial cooking) at 13%.

There was no mention of aviation as a local source of PM2.5 despite being overflown and in close proximity to Heathrow, Gatwick, London City, Stansted and Luton airports.

However, “a big proportion of PM2.5 in London comes from regional, and often transboundary (non-UK) sources”¹.

¹⁵ SMAa representation- matter 3 – section 3

¹⁶ [REP11 – 008]

¹⁷ PM2.5 in London October 2019

According to data from DEFRA¹⁸:

Table 2b: UK annual emissions of PM_{2.5} by emissions source (as proportion of total emissions): 2014 to 2019

Sector	2014	2015	2016	2017	2018	2019
	% of total emissions	% of total emissions	% of total emissions	% of total emissions	% of total emissions	% of total emissions
Energy Industries	5	4	3	3	3	2
Manufacturing Industries and Construction	19	18	17	18	18	18
Road transport	14	13	13	12	12	12
Non-road transport	3	3	3	3	3	3
Domestic combustion	36	39	42	41	42	43
<i>of which:</i>						
<i>Wood used as fuel</i>	31	34	36	35	36	38
<i>Other fuels used</i>	6	6	6	6	6	6
Other small stationary combustion & non-road mobile sources and machinery	3	3	3	3	3	3
Other mobile combustion (military aircraft and naval shipping)	0	0	0	0	0	0
Fugitive emissions	1	1	1	1	1	1
Industrial processes and use of solvents	14	13	12	13	12	12
Agriculture	2	2	3	3	3	3
Waste	3	3	3	3	3	3
Other	0	0	0	0	0	0

Source: National Atmospheric Emissions Inventory

- 33% of PM and the precursor pollutants that can form it are transported from other countries
- 15% “come from naturally occurring sources such as pollen and sea spray”¹⁹
- Manston is surrounded on 3 sides by water and the rest by farmland (part of the “Garden of England”) so is susceptible to “naturally occurring sources” of PM_{2.5} (sea spray and pollen).
- Manston is close to Europe so is exposed to the high levels of PM_{2.5} being transported from the continent.

The effect of the development on PM_{2.5} levels locally will be insignificant compared with other sources of PM_{2.5}. It is worth noting that only a few miles from the Manston Development there is a “Renewable Energy Biomass Plant” in Sandwich which burns wood pellets which, although less than domestic wood stoves, still releases significant quantities of P_{2.5}.

4.2 Aircraft Noise

In a television interview on the BBC, Cllr Constantine, a Kent County Councillor, and a prominent member of No Night Flights, who are opposed to the Manston Development, said in relation to the Manston Development:

“Lost sleep leads to miscarriages. Lost sleep leads to heart conditions and diabetes.”

4.2.1 World Health Organisation (WHO) Environmental Noise Guidelines for the European Region: A Systematic Review on Environmental Noise and Adverse Birth Outcomes. Oct 2017.

WHO looked at 455 studies but only 14 studies considered worthy of being included in the review. Conclusion “We found evidence of **very low quality** for associations between aircraft noise and preterm birth, low birth weight and congenital anomalies”.

There was no mention of miscarriage in any of the studies.

¹⁸ <https://www.gov.uk/government/statistical-data-sets/env02-air-quality-statistics>

¹⁹ <https://www.gov.uk/government/statistics/air-quality-statistics/concentrations-of-particulate-matter-pm10-and-pm25>

4.2.2 Full-time exposure to occupational noise during pregnancy was associated with reduced birth weight in a nationwide cohort study of Swedish women. Feb 2019.

“Exposure to high (>85 dBA) levels of occupational noise throughout the pregnancy (full time workers) was associated with an increased risk of the child being born small for gestational age”.

“No clear association was seen for preterm birth”.

“No consistent effects on birth outcome were observed in women who had worked part-time or were on leave of absence >21 days”.

No mention of miscarriage in the study.

N.B. One study from Utah found a possible link between NO₂ levels and miscarriage. Diesel engines are the main source of NO₂ in the UK.

4.2.3 Aircraft Noise and cardiovascular risk factors

“Few studies have been conducted looking at cardiovascular risk factors, e.g., biomarkers, adiposity, and diabetes. Two experimental studies of aircraft noise recordings played at different volumes during sleep did not find associations with inflammatory markers (Interleukin6, C-Reactive Protein) in the blood the following morning, while findings were inconsistent with adrenaline and cortisol.”²⁰

Specific studies referred to in the report above looked at the relationship between noise and cardiovascular risk factors and their findings are summarised below:

- The US study²¹ looked at night events above 45dB. Only significant above 55dB.
- For the Heathrow Study²² it compared <50dB with >55dB. Significant >55dB.
- European study²³ not significant after allowing for confounders except for those >20 years in same residence but using values 50 to >65dB.
- Swiss Study²⁴ only significant for >15yrs and >60dB.
- Denmark²⁵ no correlation
- Vancouver²⁶ no correlation.

To put this in perspective, Manston is using 50dB(A) L_{eq16hr} (0700-2300) and 40dB (A) L_{eq8hr} (23.00-07.00) contours and these levels are below the levels where any significant risk has been identified.

From the evidence above, it is clear that the statement by Cllr Constantine that “Lost sleep leads to miscarriages. Lost sleep leads to heart conditions and diabetes” is false and will have caused unnecessary alarm and distress.

²⁰ Aviation Noise Impacts - Bassner, Clark, Hansell, Hileman, Janssen, Shepherd, Sparrow 2017

²¹ Correia AW, Peters JL, Levy JI, Melly S, Dominici F. Residential exposure to aircraft noise and hospital admissions for cardiovascular diseases: Multi-airport retrospective study.

²² Hansell AL, Blangiardo M, Fortunato L, Floud S, de Hoogh K, Fecht D, et al. Aircraft noise and cardiovascular disease near Heathrow airport in London: Small area study.

²³ Floud S, Blangiardo M, Clark C, Babisch W, Houthuijs D, Pershagen G, et al. Reported heart disease and stroke in relation to aircraft and road traffic noise in six European countries – The HYENA study.

²⁴ Huss A, Spoerri A, Egger M, Roosli M. Aircraft noise, air pollution, and mortality from myocardial infarction.

²⁵ Sorensen M, Hvidberg M, Andersen ZJ, Nordsborg RB, Lillelund KG, Jakobsen J, et al. Road traffic noise and stroke: A prospective cohort study.

²⁶ an WQ, Davies HW, Koehoorn M, Brauer M. Association of long-term exposure to community noise and traffic-related air pollution with coronary heart disease mortality.

These are just two of many that we could have highlighted but they help to illustrate and confirm our belief that the adverse impacts put forward by those opposed to the Manston Development are a mixture of exaggeration and false statements.

5.0 Conclusion

- The Manston Development will Make Best Use of an existing runway and so is consistent with Government Policy.
- The Manston Development is in an area of high unemployment and deprivation and is consistent with emerging Government Policy on Levelling Up.
- The Stansted Appeal Decision makes it clear that demonstrating need is not a prerequisite.
- We believe Section 104 of the 2008 Planning Act applies and so it is up to the Secretary of State to decide matters that are both important and relevant.
- We believe Section 104 of the 2008 Planning Act applies and so it is up to the Secretary of State to decide whether the Benefits outweigh the Adverse Impacts of the development.
- The Manston Development will significantly reduce Local Unemployment.
- The Manston Development will significantly reduce deprivation in Thanet and the surrounding area.
- The Manston Development will significantly improve health outcomes for Thanet residents.
- The Manston Development will significantly improve the aspirations of both children and parents.
- The Manston Development will significantly improve the qualifications and skills of local people through its onsite training facility.
- The Manston Development will significantly increase the average gross weekly wage in Thanet and the surrounding area.
- We believe that the Adverse Impacts of the development have been exaggerated by those opposed to the Manston development.

It is our firm belief, based on evidence, that the Benefits of the development far outweigh the Adverse Impacts and urge the Secretary of State to form his own opinions based on reliable data and, by giving comprehensive well-argued reasons, grant the DCO for the Manston Development.

From the SMAa Committee on behalf of the 3,700 members

Dr Beau Webber (Chairman)



References for SMAa representation to the Secretary of State for Transport
Response to Arup Report – Part 3

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1. Stansted Airport Appeal Decision	13-46
2. Indices of Deprivation – Headline findings 2020	47-63
3. The Kings Fund	64-65
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5. Kent Online	68-70
6. 2011 census – Thanet	71-73
7. Ramsgate Active Education Foundation	74-75



Appeal Decision

Inquiry held over 30 days between 12 January 2021 and 12 March 2021

Site visits made on 17 December 2020 and 10 March 2021

by Michael Boniface MSc MRTPI, G D Jones BSc(Hons) DipTP MRTPI and Nick Palmer BA (Hons) BPI MRTPI

Panel of Inspectors appointed by the Secretary of State

Decision date: 26 May 2021

Appeal Ref: APP/C1570/W/20/3256619 London Stansted Airport, Essex

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
 - The appeal is made by Stansted Airport Limited against the decision of Uttlesford District Council.
 - The application Ref UTT/18/0460/FUL, dated 22 February 2018, was refused by notice dated 29 January 2020.
 - The development proposed is airfield works comprising two new taxiway links to the existing runway (a Rapid Access Taxiway and a Rapid Exit Taxiway), six additional remote aircraft stands (adjacent Yankee taxiway); and three additional aircraft stands (extension of the Echo Apron) to enable combined airfield operations of 274,000 aircraft movements (of which not more than 16,000 movements would be Cargo Air Transport Movements) and a throughput of 43 million terminal passengers, in a 12-month calendar period.
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Decision

1. The appeal is allowed and planning permission is granted for airfield works comprising two new taxiway links to the existing runway (a Rapid Access Taxiway and a Rapid Exit Taxiway), six additional remote aircraft stands (adjacent Yankee taxiway); and three additional aircraft stands (extension of the Echo Apron) to enable combined airfield operations of 274,000 aircraft movements (of which not more than 16,000 movements would be Cargo Air Transport Movements) and a throughput of 43 million terminal passengers, in a 12-month calendar period at London Stansted Airport, Essex in accordance with the terms of the application, Ref UTT/18/0460/FUL, dated 22 February 2018, subject to the conditions contained in the attached Schedule.

Application for Costs

2. At the Inquiry an application for costs was made by Stansted Airport Limited against Uttlesford District Council. This application is the subject of a separate Decision.

Preliminary Matters

3. The Inquiry was held as a wholly virtual event (using videoconferencing) in light of the ongoing pandemic. The Panel undertook an accompanied site visit to the airport on 10 March 2021 and an unaccompanied visit around the

- surrounding area on the same day. An unaccompanied visit to the publicly accessible parts of the airport and surrounding area also took place on 17 December 2020.
4. On 18 May 2018, during the course of the planning application, the Council agreed to a request from the appellant to change the description of development to include a restriction on cargo air transport movements. This is the basis upon which the Council subsequently determined the application. The appeal has been considered on the same basis.
 5. The Council resolved to grant planning permission for the development on 14 November 2018 but subsequently reconsidered its position before formally refusing planning permission. In light of the Council's reasons for refusal, its subsequent statement of case in this appeal and given the length of time that had passed since the application was made, an Environmental Statement Addendum (October 2020) (ESA) was produced to update the original Environmental Statement (February 2018) (ES). The Council consulted on the ESA so that all parties had an opportunity to consider its content. As such, the Panel is satisfied that no party is prejudiced by its submission at the appeal stage.
 6. The ES and ESA were prepared in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regulations), including technical appendices and a non-technical summary. They cover a range of relevant topics, informed at the ES stage by a Scoping Opinion from the Council. The Panel is satisfied that the totality of the information provided is sufficient to meet the requirements of Schedule 4 of the EIA Regulations and this information has been taken into account in reaching a decision. Accordingly, while some of the evidence is critical of the ES and ESA, including in respect to their conclusions regarding carbon emissions, there is no significant contradictory evidence that causes the ES or the ESA to be called into question.
 7. A local campaign group known as Stop Stansted Expansion (SSE) was granted Rule 6 status and participated as a main party to the Inquiry. However, shortly before the Inquiry opened it elected to rely on its written evidence for several topics so that a witness was not made available for cross-examination on those topics¹. As such, this evidence was untested and has been considered by the Panel on this basis.
 8. Rule 6 status was also granted jointly to Highways England and Essex County Council (the Highway Authorities) who initially opposed the proposal on highway grounds. However, these issues were resolved before the exchange of evidence and the Highway Authorities subsequently withdrew from the appeal proceedings, subject to appropriate planning obligations being secured.
 9. The Council's fourth reason for refusing planning permission referred to the adequacy of infrastructure and mitigation measures needed to address the impacts of the development. This reason was partly addressed following agreement with the Highway Authorities about the scope of highways mitigation required, including at Junction 8 of the M11. The adequacy and need for other forms of mitigation are addressed in the body of this decision in

¹ Historical Background, Noise, Health and Well-Being, Air Quality, Surface Access (Rail)

relation to relevant topics and/or in relation to the discussion on conditions and planning obligations, such that this is not a main issue in the appeal.

10. Upon exchange of evidence between the parties, it became clear that the Council accepted that planning permission should be granted for the development, subject to conditions and obligations. However, there remained significant divergence between the parties as to the form and extent of any conditions and much time was spent discussing this matter over the course of the Inquiry.
11. On 20 April 2021, the Government announced that it would set a new climate change target to cut emissions by 78% by 2035 compared to 1990 levels and that the sixth Carbon Budget will incorporate the UK's share of international aviation and shipping emissions. The parties were invited to make comment and their responses have been taken into account in reaching a decision².

Main Issues

12. The main issues are the effect of the development on aircraft noise, air quality and carbon/climate change.
13. However, it is first necessary to consider national aviation policy and some introductory matters.

Reasons

National Aviation Policy and Introductory Matters

14. The Aviation Policy Framework (March 2013) (APF) sets out the Government's high-level objectives and policy for aviation. It recognises the benefits of aviation, particularly in economic terms, and seeks to ensure that the UK's air links continue to make it one of the best-connected countries in the world. A key priority is to make better use of existing runway capacity at all UK airports. Beyond 2020, it identifies that there will be a capacity challenge at all of the biggest airports in the South East of England.
15. There is also, however, an emphasis on the need to manage the environmental impacts associated with aviation and a recognition that the development of airports can have negative as well as positive local impacts. Climate change is identified as a global issue that requires action at a global level, and this is said to be the Government's focus for tackling international aviation emissions, albeit that national initiatives will also be pursued where necessary.
16. More recently, the Government published the ANPS³ and MBU⁴, on the same day, as early components of the forthcoming Aviation Strategy. The ANPS is primarily concerned with providing a policy basis for a third runway at Heathrow and is relevant in considering other development consent applications in the South East of England. It is of limited relevance to the current appeal as it is not a Nationally Significant Infrastructure Project (NSIP). Although the ANPS does refer to applications for planning permission, it notes the findings of the Airports Commission on the need for more intensive use of

² Having heard a significant amount of evidence on carbon and climate change during the Inquiry, the matters raised by the announcement did not necessitate reopening the Inquiry. Nor was it necessary for the ES to be further updated, as the announcement does not have a significant bearing on the likely effects of the development

³ Airports National Policy Statement: new runway capacity and infrastructure at airports in the South East of England (June 2018)

⁴ Beyond the horizon, The future of UK aviation, Making best use of existing runways (June 2018)

- existing infrastructure and accepts that it may well be possible for existing airports to demonstrate sufficient need for their proposals, additional to (or different from) the need which is met by the provision of a Northwest Runway at Heathrow.
17. MBU builds upon the APF, again referencing work undertaken by the Airports Commission which recognised the need for an additional runway in the South East by 2030 but also noted that there would be a need for other airports to make more intensive use of their existing infrastructure. On this basis, MBU states that the Government is supportive of airports beyond Heathrow making best use of their existing runways⁵. There is no requirement flowing from national aviation policy for individual planning applications for development at MBU airports, such as Stansted, to demonstrate need⁶ for their proposed development or for associated additional flights and passenger movements. This was not disputed by the Council and whilst SSE took a contrary view, even its witness accepted that there was a need for additional capacity within the London airport network, beyond any new runway at Heathrow⁷.
 18. The in-principle support for making best use of existing runways provided by MBU is a recent expression of policy by the Government. It is given in full knowledge of UK commitments to combat climate change, having been published long after the Climate Change Act 2008 (CCA) and after the international Paris Agreement. It thoroughly tests the potential implications of the policy in climate change terms, specifically carbon emissions. To ensure that Government policy is compatible with the UK's climate change commitments the Department for Transport (DfT) aviation model was used to look at the impact of allowing all MBU airports to make best use of their existing runway capacity⁸. This methodology appears to represent a robust approach to the modelling.
 19. International aviation emissions are not currently included within UK carbon budgets and are instead accounted for through 'headroom' in the budgets, with a planning assumption for aviation emissions of 37.5Mt of CO₂. Whilst the Government has recently announced that international aviation will expressly form part of the sixth Carbon Budget, its budget value has not yet been defined.
 20. Of course, the headroom approach of taking account of emissions from international aviation which has been used to date means that accounting for such carbon emissions as part of the Carbon Budget process is nothing new. What is set to change, however, is the process by which it is taken into account. As of yet, there has been no change to the headroom planning assumption. Nor has there been any indication from the Government that there will be a need to restrict airport growth to meet the forthcoming budget for international aviation, even if it differs from the current planning assumption. The specific carbon/climate change implications of this appeal are considered in more detail below.

⁵ There is nothing in MBU which suggests that making best use proposals cannot involve operational development of the type proposed in this case

⁶ Notwithstanding conclusions in relation to Manston Airport, which is not comparable to the current proposal (being a Development Consent Order scheme, involved an unused airfield and was a cargo-led proposal rather than passenger)

⁷ Brian Ross in response to questions from the Inspector

⁸ Emissions from UK airports not included in the model are unlikely to be significant as they are small and offer only short-range services

21. MBU sets out a range of scenarios for ensuring the existing planning assumption can be met, again primarily through international agreement and cooperation, considering carbon traded or carbon capped scenarios. It concludes that the MBU policy, even in the maximum uptake scenario tested, would not compromise the planning assumption.
22. Notwithstanding that conclusion, no examples of MBU-type airport development having gained approval since the publication of MBU were brought to the attention of the Inquiry⁹ and whilst numerous other airports have plans to expand, none of those identified appear to have a prospect of receiving approval before this scheme. As such, it can be readily and reasonably concluded that this development would not put the planning assumption at risk.
23. Consistent with the APF, MBU differentiates between the role of local planning and the role of national policy, making it clear that the majority of environmental concerns, such as noise and air quality, are to be taken into account as part of existing local planning application processes. Nonetheless, it adds that some important environmental elements should be considered at a national level, such as carbon emissions, which is specifically considered by MBU. The Council apparently understood this distinction in resolving to grant planning permission in 2018. However, it subsequently changed its position, deciding that carbon is a concern for it as local planning authority despite MBU, and this led, at least in part, to the refusal of planning permission, as well as to its subsequent case as put at the Inquiry.
24. Since publication of MBU, UK statutory obligations under the CCA have been amended to bring all greenhouse gas emissions to net zero by 2050, compared to the previous target of at least 80% reduction from 1990 levels. In addition, the Government has indicated a new climate change target to cut emissions by 78% by 2035 compared to 1990 levels, effectively an interim target on the journey to net zero. Notwithstanding these changes, MBU has remained Government policy. There are any number of mechanisms that the Government might use to ensure that these new obligations are achieved which may or may not involve the planning system and may potentially extend to altering Government policy on aviation matters.
25. These are clearly issues for the Government to consider and address, having regard to all relevant matters (not restricted to aviation). The latest advice from the Committee on Climate Change (CCC) will be one such consideration for the Government but it cannot currently be fully known to what extent any recommendations will be adopted. The Government is clearly alive to such issues and will be well aware of UK obligations¹⁰.
26. The ES and ESA contain detailed air traffic forecasts which seek to demonstrate the difference between a 'do minimum' scenario, where the airport makes use of its existing planning permission within its relevant restrictions, and the 'development case' scenario where the appeal development were to proceed. The forecasts are prepared in accordance with industry guidance and practise

⁹ With the potential exception of the Southampton Airport scheme, which involved a runway extension to accommodate larger aircraft. No detailed evidence in relation to this scheme was provided by the parties, but it would not alter the Panel's conclusions on MBU support even if an increase in capacity resulted from the scheme

¹⁰ Not least from the recent Supreme Court Judgement in respect of the ANPS - R (on the application of Friends of the Earth Ltd and others) v Heathrow Airport Ltd [2020] UKSC 52

- by a professional in this field working as a Director in the aviation department for a global consulting service.
27. The Council, whilst highlighting the inherent uncertainty in forecasts and projections into the future, did not dispute the appellant's position on forecasting, concluding that the predictions were reasonable and sensible¹¹. SSE made a series of criticisms of the inputs and assumptions used by the appellant, but these were largely based on assertion and often lacked a clear evidential basis. Different opinions about the likely number of passengers per air transport movement, fleet replacement projections, dominance of / reliance on a single airline at Stansted and cargo expectations were all rebutted by the appellant with justification for the inputs and assumptions used. The Panel was not persuaded that the conclusions in the ES and ESA were incorrect or unreliable. Indeed, they are to be preferred over the evidence of SSE on this matter, which was not prepared by a person qualified or experienced in air traffic forecasting. Accordingly, the forecasts contained within the ES and ESA are sufficiently robust and the best available in this case.
28. The appellant's forecasts do not align with those prepared by the Government in 2017 (DfT forecasts) which are used as the basis for conclusions in MBU, as referred to above. However, there is no reason why they should. The DfT makes clear that its forecasts are a long-term strategic look at UK aviation, primarily to inform longer term strategic policy. They do not provide detailed forecasts for each individual airport in the short-term and the DfT acknowledge that they may differ from local airport forecasts, which are prepared for different purposes and may be informed by specific commercial and local information not taken into account by the DfT. As such, the DfT states that its forecasts should not be viewed as a cap on the development of individual airports.
29. On this basis, the Panel does not accept that a divergence between the appellant's and the DfT's forecasts indicate any unreliability in the data contained in the ES and ESA. Nor is there any justification for applying a reduction to the appellant's forecasts¹². Furthermore, SSE's forecasting witness recently challenged the validity and reliability of the DfT forecasts in the High Court while acting for SSE, thereby further calling into question the credibility of their now contradictory evidence to this Inquiry.
30. It remained unclear throughout the Inquiry, despite extensive evidence, why the speed of growth should matter in considering the appeal. If it ultimately takes the airport longer than expected to reach anticipated levels of growth, then the corresponding environmental effects would also take longer to materialise or may reduce due to advances in technology that might occur in the meantime. The likely worst-case scenario assessed in the ES and ESA, and upon which the appeal is being considered, remains just that. Conversely, securing planning permission now would bring benefits associated with providing airline operators, as well as to other prospective investors, with significantly greater certainty regarding their ability to grow at Stansted, secure long-term growth deals and expand route networks, potentially including long haul routes.

¹¹ Proof of Hugh Scanlon, UDC/4/1

¹² This is notwithstanding examples of previous air traffic forecasts for Stansted and other airports that have not been borne out for whatever reason. Any reduction to account for perceived optimism bias would be arbitrary and unlikely to assist the accuracy of the forecasts

31. SSE argued that the 'do minimum' case had been artificially inflated to minimise the difference from the 'development case'. However, there is no apparent good reason why the airport would not seek to operate to the maximum extent of its current planning restrictions if the appeal were to fail. Indeed, as a commercial operator, there is good reason to believe that it would. The fact that it does not operate in this way already does not mean it cannot or will not in future. In fact, the airport has seen significant growth in passenger numbers in recent years, since Manchester Airports Group took ownership, albeit that these have latterly been affected by the pandemic.
32. As such, there is no good reason to conclude that the air traffic forecasts contained within the ES and ESA are in any way inaccurate or unreliable. Of course, there is a level of uncertainty in any forecasting exercise but those provided are an entirely reasonable basis on which to assess the impacts of the proposed development. The Panel does not accept that there has been any failure to meet the requirements of the EIA Regulations, as concluded above.

Aircraft Noise

33. The overarching requirements of national policy, as set out in the National Planning Policy Framework (the Framework) and the Noise Policy Statement for England (NPSE), are that adverse impacts from noise from new development should be mitigated and reduced to a minimum and that significant adverse impacts on health and quality of life should be avoided. It is a requirement of the NPSE that, where possible, health and quality of life are improved through effective management and control of noise.
34. The APF states that the overall policy is to limit and, where possible, reduce the number of people significantly affected by aircraft noise. The APF expects the aviation industry to continue to reduce and mitigate noise as airport capacity grows and that as noise levels fall with technology improvements the benefits are shared between the industry and local communities.
35. While the APF states that the 57 dB LAeq 16 hour contour should be treated as the average level of daytime aircraft noise marking the approximate onset of significant community annoyance, the 2014 Survey of Noise Attitudes (SoNA) indicates that significant community annoyance is likely to occur at 54 dB LAeq 16 hour. The latter metric has been used by the Civil Aviation Authority in its *Aviation Strategy: Noise Forecast and Analysis – CAP 1731*. It has also been used in the Government's consultation *Aviation 2050, The future of UK aviation*. The Council and the appellant agree that the 54 dB LAeq 16 hour contour should be the basis for future daytime noise restrictions in this case.
36. The NPSE describes the concepts of Lowest Observed Adverse Effect Level (LOAEL) and Significant Observed Adverse Effect Level (SOAEL). The LOAEL is set at 51 dB LAeq 16 hour in the DfT's Air Navigation Guidance and is the level above which adverse effects on health and quality of life can be detected. These levels apply to daytime hours. The corresponding levels at night are a LOAEL of 45 dB LAeq 8 hour and onset of significant annoyance at 48dB LAeq 8 hour.
37. The World Health Organisation's (WHO) Environmental Noise Guidelines 2018 (ENG) recommend lower noise levels than those used in response to SoNA. The Government has stated in *Aviation 2050* that it agrees with the ambition to reduce noise and to minimise adverse health effects, but it wants

- policy to be underpinned by the most robust evidence on these effects, including the total cost of action and recent UK specific evidence which the WHO did not assess. These factors limit the weight that can be given to the lower noise levels recommended in the ENG.
38. Aircraft modernisation is reducing aircraft noise over time. It has been demonstrated that the daytime 57 dB and 54 dB noise contours will decrease in extent over the period to 2032, both with and without the development, albeit that the 54 dB contour would be slightly larger in the development case (DC) compared to the do minimum (DM) scenario. The 51 dB LOAEL contour is however predicted to increase slightly in extent compared to the 2019 baseline.
 39. The night-time 48 dB contour is also predicted to decrease in extent and this reduction would be greater in the DC than in the DM scenario. This is based upon there being a greater amount of fleet modernisation, including fewer of the noisier cargo flights.
 40. The ESA compares the DC with the DM scenario at 2032, which is when the maximum passenger throughput is predicted to be reached, and at 2027 which is identified as the transition year. In 2032 there would be an increase in air noise levels during the daytime of between 0.4 and 0.6 dB which is assessed as a negligible effect. There would be a beneficial reduction in night-time noise of between 0.3 and 0.8 dB in the DC compared to DM, but this is also assessed as negligible.
 41. Saved Policy ENV11 of the Uttlesford Local Plan 2005 (ULP) resists noise generating development if this would be liable to adversely affect the reasonable occupation of existing or proposed noise sensitive development nearby. The ESA demonstrates that this would not be the case.
 42. It is necessary to ensure that the benefits in terms of the reduction in noise contours over time arising from fleet modernisation, and the reduction in night noise are secured in order that these are shared with the community in accordance with national policy in the APF. The Council's position is that the development is acceptable in terms of aircraft noise, subject to suitable mitigation measures. Condition 7 defines the maximum areas to be enclosed by 54 dB LAeq 16hour, and 48 dB LAeq 8 hour noise contours and requires that the area enclosed by each of those contours is reduced as passenger throughput is increased, in accordance with the findings of the ESA.
 43. There is no control of the night-time noise contour under the existing permission. This is instead subject to control under the Government's night flight restrictions which impose a Quota Count. It is noted that the Secretaries of State in granting the last planning permission considered that there was no need for such a condition because of the existing controls.
 44. However, the night flight restrictions do not cover the full 8 hour period used in the LAeq assessment. Consequently, if only the night flight restrictions were to be relied upon, there would be no control of aircraft noise between 23:00 and 23:30 hours and between 06:00 and 07:00 hours. The ESA has demonstrated that the reductions in night noise would be beneficial to health. For these reasons, inclusion of the LAeq 8hour restriction in condition 7 would be necessary. In coming to this view, the Panel has taken into account the dual restrictions that would apply. However, the night noise contour requirement in condition 7

- would be necessary to secure the benefit and it has not been demonstrated that the night noise restrictions would be sufficient in this respect.
45. The Panel has considered SSE's submissions concerning the methodology used in the ES and ESA. The use of L_{Aeq} levels in the assessment is in accordance with Government policy and reflects the conclusions of SoNA, but the ES and ESA also include assessments of the number of flights exceeding 60 and 65 dB(A) and maximum single event noise levels. The assessments of aircraft noise are comprehensive, and the methodology used is justified and widely accepted as best practice, including by the Government and industry. The Council considers that the methodology used is robust. The Panel has also considered the evidence on air traffic forecasts and, for the reasons given elsewhere in this decision, is satisfied that the assumptions regarding fleet replacements are robust.
 46. SSE has referred to the number of complaints about noise increasing in recent years. However, it is also relevant to consider the number of complainants which has significantly decreased. These factors have been taken into account in the ES and ESA.
 47. The existing sound insulation grant scheme (SIGS) provides for financial assistance to homeowners and other noise-sensitive occupiers, to be used to fund sound insulation measures. This uses a contour which is based on 63 dB $L_{Aeq 16 \text{ hour}}$ for daytime and the aggregate 90 dBA SEL footprint of the noisiest aircraft operating at night.
 48. The submitted Unilateral Undertaking (UU) provides for an enhanced SIGS whereby a 57 dB daytime contour is used, thereby increasing its extent and the number of properties covered. This is consistent with the evolving perceptions of the level of significant adverse effects and exceeds the levels recommended for such measures as stated in the APF. The use of this contour together with the 90 dBA SEL footprint as qualifying criteria would provide mitigation against both daytime and night-time noise. The latter criterion recognises that sleep disturbance is more likely to arise from single events than average noise levels over the night-time period.
 49. The UU also applies to specific identified noise-sensitive properties including schools, community and health facilities and places of worship. An assessment of these properties has been undertaken using the daytime 57 dB contour used for residential properties, the number of flights above 65 dB and the maximum sound levels of aircraft flying over properties. Inclusion of properties in the list in Schedule 2 Part 1 of the UU means that bespoke measures may be discussed between the property owner and the airport operator and that further noise surveys may be undertaken. Thaxted Primary School does not qualify for inclusion in the list under the criteria used. However, submissions were made to the Inquiry that the school should be included. It has provisionally been included in the list subject to the Panel's decision.
 50. Thaxted Primary School is outside, but adjacent to the boundary identified for the SIGS. This is represented by the 57 dB $L_{Aeq 16 \text{ hour}}$ and 200 daily flights above 65 dB (N65 200). The school is well outside the 63 and 60 dB contours, the former being the level that Government policy recognises, in the APF, as requiring acoustic insulation to noise-sensitive buildings and the latter the level to which this may potentially be reduced.

51. Departing aircraft predominantly take off towards the south-west, away from the school. Those that do take off towards the north-east turn onto standard routes away from the school before reaching it. The school is, however exposed to noise from arriving aircraft.
52. Standards for internal noise levels in schools are set out in *Building Bulletin 93 – Acoustic design of schools: performance standards* (BB93). These use LAeq 30mins as a metric because school pupils experience noise over limited periods and not over the full daytime period. No assessment has been undertaken using this metric. It is, however, possible to determine the effect of the proposal having regard to the maximum sound levels of aircraft flying over the property in question.
53. It has been demonstrated that the school would not be exposed to LAmax flyover levels of 72 dB or more. The Council agrees that this maximum level would ensure that internal noise levels would not exceed 60 dB, with windows open. This provides a good degree of certainty that noise levels would be in accordance with BB93 which states that indoor ambient noise levels should not exceed 60 dB LA1, 30 mins.
54. No representations have been made either by the school or the education authority with regard to inclusion of Thaxted Primary School in the list. It has not been demonstrated that the school should be included in the list in terms of any specific need for mitigation. For these reasons the inclusion of Thaxted Primary School in the list of properties in Schedule 2 Part 1 of the UU would not be necessary and on this basis this provision would not meet the tests in the Community Infrastructure Levy Regulations 2010 (the CIL Regulations).
55. The noise assessments in the ES and ESA take into account ground noise from aircraft. The Council's reason for refusal concerns only aircraft noise and not noise from ground plant and equipment or surface access. The Panel has considered the evidence provided by SSE in respect of the latter, but these do not alter its conclusions on this main issue.
56. It has been demonstrated beyond doubt that the development would not result in unacceptable adverse aircraft noise and that, overall, the effect on noise would be beneficial. Subject to the mitigation provided by the UU and the restrictions imposed by condition 7, the development would accord with Policy ENV11 of the ULP and with the Framework.

Air Quality

57. Although air pollution levels around the airport are for the most part well within adopted air quality standards, an area around the Hockerill junction in Bishop's Stortford has nitrogen dioxide levels that are above those standards. This is designated an Air Quality Management Area (AQMA). The development would increase emissions from aircraft, other airport sources and from road vehicles, but this would be against a trend of reduction in air pollution as a result, amongst other things, of increasing control of vehicle emissions.
58. The pollutants which are assessed are oxides of nitrogen (NOx), particulate matter (PM10) and fine particulate matter (PM2.5). Ultrafine particulates (UFP) are recognised as forming a subset of PM2.5 and they are likely to affect health. However, there is no recognised methodology for assessing UFP and the most that can be done is a qualitative, rather than quantitative assessment.

59. Policy ENV13 of the ULP resists development that would involve users being exposed on an extended long-term basis to poor air quality outdoors near ground level. The Policy identifies zones on either side of the M11 and the A120 as particular areas to which the Policy applies.
60. Paragraph 170 of the Framework states that development should, wherever possible, help to improve local environmental conditions such as air quality. Paragraph 181 states that planning decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of AQMAs and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified.
61. Emissions of NO_x, PM₁₀ and PM_{2.5} would increase slightly in the DC compared to the DM scenario. They would also increase in comparison to the 2019 baseline. However, pollutant levels resulting from other sources, notably road traffic, are forecast to decline. The ES and ESA demonstrate that there would be no exceedance of air quality standards at human receptors and that air quality impacts would be negligible. The overall effect of the development in terms of air quality would be in accordance with the Framework and with the Clean Air Strategy, which refers to the need to achieve relevant air quality limit values. While the Framework seeks to improve air quality where possible, it recognises that it will not be possible for all development to improve air quality.
62. While the proposed development would not improve air quality, the UU secures a number of measures to encourage the use of public transport and to reduce private car use, including single occupancy car trips. The airport has a Sustainable Development Plan which, whilst not binding, commits to reducing air pollution. It has already achieved significant increases in use of public transport, thereby limiting emissions and these initiatives would be continued. The measures would have other objectives such as reducing carbon emissions, which would not necessarily benefit air quality but nonetheless the provisions of the UU would overall be likely to secure improvements in air quality.
63. Although it has raised a number of issues concerning the methodology used and the robustness of the assessments during the appeal process, the Council made no request for further information under the EIA Regulations.
64. SSE has commented on a number of aspects of the air quality assessments, including the transport data used, the receptors assessed and modelling. The appellant has provided clarification of the aspects that have been queried by SSE and has justified the approach taken and the assumptions made. The appellant's responses provide sufficient reassurance that the assessments are soundly based and that they are conservative.
65. The air quality assessment depends on the assessment of road traffic in terms of vehicle emissions. Surface access is dealt with elsewhere in this decision, but the transport modelling forms a robust assessment which has been accepted by the Highway Authorities. Consequently, this forms a sound basis for the air quality assessment.
66. The Clean Air Strategy includes a commitment to significantly tighten the current air quality objective for fine particulates, but no numerical standard has yet been set. The current objective for PM_{2.5} is 25µg/m³. The 2008 WHO guidelines recommend an ultimate goal for annual mean concentrations of

- PM_{2.5} of 10µg/m³. The Clean Air Strategy commits to examine the action that would be necessary to meet this limit but no timescale for this has been set.
67. The ESA assesses the largest concentration of PM_{2.5} in 2032 to be 11.6µg/m³ in the DC. This is well below the current objective but slightly above the more ambitious WHO guideline. The great majority of the modelled concentrations would be below that guideline value. The assessment also shows that the effect of the development by comparison to the DM scenario would be negligible. The proposal would not unacceptably compromise the Clean Air Strategy in reducing concentrations of PM_{2.5} and accords with the current objective.
68. The Bishop's Stortford AQMA is within East Hertfordshire District Council's (EHDC) administrative area. Policy EQ4 of the East Hertfordshire Local Plan 2018 requires minimisation of impacts on local air quality. That Policy also requires, as part of the assessment, a calculation of damage costs to determine mitigation measures. The ES and ESA demonstrate that there would be negligible effects for which the UU secures mitigation measures. EHDC has consequently raised no objection to the proposal.
69. The AQMA is centred around a traffic signal-controlled road junction which is enclosed by buildings on all sides. The A1250 is at a gradient on both sides of the junction. It is likely that the high monitored levels of pollutants here result from emissions from queuing traffic and the enclosing effect of the buildings. Nitrogen dioxide (NO₂) levels have been declining here in recent years, with a reduction in levels between 2012 and 2019. However, NO₂ levels remain above the air quality standard for 3 of the 4 locations monitored and significantly above the standard for 2 of those locations.
70. An adjustment factor has been used to compensate for the difference between modelled and measured concentrations of NO₂ in the AQMA. Uttlesford District Council is concerned that this factor is unusually high, but it has been undertaken in accordance with Defra's Local Air Quality Management Technical Guidance TG16 and on this basis, is not considered unreasonable. This guidance was used together with the Emission Factor Toolkit and Defra's background pollutant concentrations maps in predicting future improvements in air quality. Sensitivity tests using less optimistic assumptions regarding future improvements in air quality were incorporated in the ES and ESA. While there is acknowledged uncertainty in predicting future levels, a rigorous approach has been used in the assessment.
71. It is not disputed that airport activities contribute less than 1% to NO_x concentrations in Bishop's Stortford. The appellant's transport modelling demonstrates that any increase in traffic along the A1250 and through the Hockerill junction would, at worst be 1.3% of current traffic flow in the DC compared to DM. This extra traffic would not necessarily be evenly distributed throughout the day. Queuing traffic would tend to increase emissions and the adjacent buildings would have an enclosing effect. Nonetheless, this level of additional traffic would be unlikely to appreciably affect pollution levels in the AQMA.
72. It is common ground that UFPs result from combustion sources including burning of aviation fuel, which contains higher levels of sulphur than fuel used for road vehicles. It is also agreed that there is no reliable methodology for assessing the quantity of UFPs that would result from the development. It is

- the quantity of these particulates, rather than their mass, that is particularly relevant in terms of implications for human health.
73. Although the development would result in increases in PM_{2.5}, the ES and ESA demonstrate that those increases would be negligible compared to the DM scenario. It is also the case that ambient levels of PM_{2.5} are predicted to reduce over time. The assessment considers the mass of PM_{2.5}. While assumptions can be made about the mass of UFPs as a subset of PM_{2.5} reducing over time, it is not possible to conclude on the number of UFPs in the absence of any recognised assessment methodology. That said, the Health Impact Assessment considered epidemiological research, which includes the existing health effects of PM_{2.5} and thus UFPs as a subset. This concluded that there would be no measurable adverse health outcomes per annum.
 74. The Aviation 2050 Green Paper proposes improving the monitoring of air pollution, including UFP. While the significance of UFP as a contributor to the toxicity of airborne particulate matter is recognised, footnote 83 of the Green Paper notes that the magnitude of their contribution is currently unclear.
 75. The Council, while raising concern over UFPs, is nonetheless content that permission could be granted subject to conditions requiring monitoring of air quality. The UU secures such monitoring, and condition 10 requires implementation of an air quality strategy, which is to be approved by the Council.
 76. The nearby sites of Hatfield Forest and Elsenham Woods are Sites of Special Scientific Interest (SSSI). Policy ENV7 of the ULP seeks to protect designated habitats.
 77. The ES and ESA assessments were undertaken in accordance with Environment Agency¹³ and Institute of Air Quality Management (IAQM)¹⁴ guidance. The ESA demonstrates that the development would result in long-term critical loads for NO_x concentrations at the designated sites being increased by less than 1%.
 78. Previous monitoring has shown that 24-hour mean NO_x concentrations can greatly exceed annual mean concentrations. Condition 10 requires a strategy to minimise emissions from airport operations and surface access. A condition has also been suggested which would require assessment of 24-hour mean NO_x concentrations at the designated sites and provision of any necessary mitigation. The IAQM guidance states that the annual mean concentration of NO_x is most relevant for its impacts on vegetation as effects are additive. The 24-hour mean concentration is only relevant where there are elevated concentrations of sulphur dioxide and ozone which is not the case in this country. Natural England has accepted the assessment and has not requested use of the 24-hour mean concentration.
 79. The UU includes obligations to monitor air quality, and to discuss with the Council the need for any measures to compensate for any adverse effect on vegetation within the designated sites. Because monitoring of air quality and necessary mitigation in respect of the SSSIs would be secured by the UU, the suggested condition to assess 24-hour mean NO_x concentrations would not be necessary.

¹³ Environment Agency H1 guidance

¹⁴ Institute of Air Quality Management: Land-Use Planning & Development Control: Planning for Air Quality (2017)

80. The ES concluded that there would be no significant effect at ecological receptors. The Council considers that the development would be acceptable in air quality terms subject to imposition of suitable conditions to limit the air quality effects and to secure mitigation measures.
81. For the reasons given, it has been demonstrated that the development would not have an unacceptable effect on air quality and that it accords with Policies ENV7 and ENV13 of the ULP.

Carbon and Climate Change

82. There is broad agreement between the parties regarding the extremely serious risks associated with climate change. These risks are acknowledged and reflected in Government policy. Indeed, in this regard, the Framework states, amongst other things, that the environmental objective of sustainable development embraces *mitigating and adapting to climate change, including moving to a low carbon economy*. It adds that *the planning system should support the transition to a low carbon future in a changing climate ... and ... should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions*.
83. Nonetheless, in spite of that general accord there remains much disagreement between the main parties to the Inquiry over how the effects of the development on climate change should be assessed, quantified, monitored and managed, including into the future.
84. The Government has recently made it clear that it will target a reduction in carbon emissions by 78% by 2035 compared to 1990 levels and that the sixth Carbon Budget, scheduled to be introduced before the end of June 2021, will directly incorporate international aviation emissions rather than by using the headroom / planning assumption approach of the previous budgets. The first of these measures will introduce a target for reducing emissions prior to the net zero target of 2050, acting as an intermediate target, and is set to be enshrined in law.
85. The latter measure will alter the way in which such emissions are accounted for. The Government intends to set the sixth Carbon Budget at the 965 MtCO₂e level recommended by the CCC. As outlined above, carbon emissions from international aviation have always been accounted for in past carbon budgeting. There is no good reason to assume that the coming change in how they are accounted for will significantly alter Government policy in this regard or that the Government intends to move away from its MBU policy.
86. Indeed, the Government's press release expressly states, amongst other things, that *following the CCC's recommended budget level does not mean we are following their policy recommendations*. Moreover, it also says that *the Government will 'look to meet' this reduction through investing and capitalising on new green technologies and innovation, whilst maintaining people's freedom of choice, including on their diet. For that reason, the 6CB will be based on its own analysis, and 'does not follow each of the Climate Change Committee's specific policy recommendations.'*
87. As outlined in the *National Aviation Policy and Introductory Matters* subsection, there is in-principle Government policy support for making best use of existing runways at airports such as Stansted, and MBU thoroughly tests the potential

- implications of the policy in terms of carbon emissions. International aviation carbon emissions are not currently included within UK carbon budgets, but rather are accounted for via an annual 'planning assumption' of 37.5MtCO₂. MBU policy establishes that, even in the maximum uptake scenario tested, this carbon emissions planning assumption figure would not be compromised.
88. The contents of the ES and ESA, which - unlike MBU - specifically assess the potential impacts of the appeal development, support the conclusions of MBU in this regard. Indeed, they indicate that the proposed development would take up only an extremely small proportion of the current 'planning assumption'. For instance, the ESA shows in 2050 that the additional annual carbon emissions from all flights resulting from the development are likely to be in the region of 0.09MtCO₂, which would equate to only 0.24% of the 37.5MtCO₂ planning assumption¹⁵.
89. This assessment assumes that the airport would not seek to use its permitted total of 274,000 ATMs in the event that the appeal were to be dismissed. Yet, in practice, it seems more likely that it would, as a commercial operator, seek to maximise flights. Consequently, the relative increase in carbon emissions resulting from the development would be likely to be less than as predicted in the ESA compared to what might happen if the proposed development were not to proceed.
90. In light of the CCC's recommendations and the Government's 20 April 2021 announcement, the 37.5MtCO₂ planning assumption, as a component of the planned total 965 MtCO_{2e} budget, may well change. Even if it were to be reduced as low as 23MtCO₂, as is suggested might happen by the Council's carbon/climate change witness with reference to the advice of the CCC on the sixth Carbon Budget, an increase in emissions of 0.09MtCO₂ resulting from the appeal development in 2050 would be only some 0.39% of this potential, reduced figure.
91. Unsurprisingly, the carbon emission figures in the ESA vary across the years modelled to 2050 and over the three scenarios employed from 2032 ('Pessimistic', 'Central' and 'Best practice'). For instance, the predicted additional annual carbon emissions from flights increases steadily from the base-year of 2019 over the years to 2032 leading to a predicted increase of some 0.14MtCO₂ in 2032¹⁶, which equates to 0.38% of the planning assumption. Notwithstanding these variations, in each case the annual values for all years and scenarios would, nonetheless, remain only a very small proportion of both the Government's established planning assumption and a potentially reduced assumption of 23MtCO₂.
92. Of course, these are annual emissions figures and, as such, they need to be summed in order to give the full, cumulative amount of predicted additional carbon emissions resulting from flights associated with the appeal development for any year on year period, such as the 2019 to 2050 period used in the ESA. Consequently, the cumulative additional emissions predicted in the ESA for the entire 2019-2050 period or for the 2032-2050 period are far greater than the 0.09MtCO₂ forecast for the year 2050. However, the Government's planning

¹⁵ 0.09MtCO₂ is the difference between the 'Annual Development Case Central' and the 'Annual Do Minimal Central' scenarios of the ESA

¹⁶ 0.14MtCO₂ is the difference between the 'Development Case Pessimistic' and the 'Do Minimum Pessimistic' scenarios of the ESA

assumption of 37.5MtCO₂ is also an annual figure, as is the figure of 23MtCO₂, such that the relative cumulative amounts of carbon emissions would remain proportionately small.

93. Notwithstanding reference to a range of planned airport development as part of the appeal process, the fact that no examples of MBU-type development having been approved since the publication of MBU were brought to the attention of the Inquiry lends further support to the conclusion that this development alone would not put the planning assumption at risk¹⁷.
94. Although UK statutory obligations under the CCA have been amended since the publication of MBU to bring all greenhouse gas emissions to net zero by 2050, with an additional target of a 78% reduction in carbon emissions by 2035 set to be introduced, MBU remains Government policy. Given all of the foregoing and bearing in mind that there are a range of wider options that the Government might employ to meet these new obligations and that aviation is just one sector contributing to greenhouse gas emissions to be considered, there is also good reason to conclude that the proposed development would not jeopardise UK obligations to reach net zero by 2050 or to achieve the planned 2035 intermediate target. On this basis, given the very small additional emissions forecast in relative terms, there is also no reason to expect that the Council's climate emergency resolution should be significantly undermined.
95. The aviation emissions assessments of the ES and ESA are reported as CO₂ only rather than in the wider terms of carbon dioxide equivalent emissions (CO₂e), which also includes nitrous oxide (N₂O) and methane (CH₄), and which the Government has adopted for its sixth Carbon Budget. While it may have been beneficial to have used CO₂e in preference to CO₂ in the ES and ESA, this was not a matter raised by the Council during scoping, nor at any other stage prior to the exchange of evidence. The approach of the ES and ESA, in this regard, is also consistent with the DfT's 2017 Forecasts and with the MBU policy. Consequently, the approach adopted in the ES and ESA is not flawed or incorrect as such. In any event, the evidence indicates that were N₂O and CH₄ to have been included in the ES and ESA assessments, the results would not change significantly on the basis that N₂O and CH₄ account for in the region of only 0.8 to 1.0% of total international aviation CO₂e emissions.
96. In addition to carbon and carbon dioxide equivalent emissions, other non-carbon sources have the potential to effect climate change. Nonetheless, they are not yet fully understood, with significant uncertainties remaining over their effects and how they should be accounted for and mitigated. There is currently no specific Government policy regarding how they should be dealt with and uncertainty remains over what any future policy response might be. Moreover, no evidence was put to the Inquiry which clearly and reliably establishes the extent of any such effects.
97. The nature of non-carbon effects resulting from aviation has parallels with carbon effects in that they are complex and challenging, perhaps even more so than carbon effects given the associated greater uncertainties, and that they largely transcend national boundaries. Consequently, in the context of MBU development, it is reasonable to conclude that they are matters for national Government, rather than for individual local planning authorities, to address.

¹⁷ Subject to footnote 9 above

It is also noteworthy that the current advice on this matter from the CCC to the Government appears largely unchanged compared to its previous advice.

98. In this context, therefore, the potential effects on climate change from non-carbon sources are not a reasonable basis to resist the proposed development, particularly bearing in mind the Government's established policy objective of making the best use of MBU airports. Moreover, if a precautionary approach were to be taken on this matter, it would be likely to have the effect of placing an embargo on all airport capacity-changing development, including at MBU airports, which seems far removed from the Government's intention.
99. The reason for refusal relating to carbon emissions and climate change refers only to the proposed development's effects resulting from additional emissions of international flights. Nonetheless, the evidence put forward as part of the appeal process also refers to wider potential effects on climate change, including carbon emissions from sources other than international flights.
100. Discussion and testing of the evidence during the Inquiry process revealed no good reasons to conclude that any such effects would have any significant bearing on climate change. Indeed, the Statement of Common Ground on Carbon between the appellant and Council states that *the emissions from all construction and ground operation effects (i.e. all sources of carbon other than flight emissions) are not significant*. It adds that *Stansted Airport has achieved Level 3+ (carbon neutrality) Airport Carbon Accreditation awarded by the Airport Council International*.
101. Given the conclusions outlined above regarding the potential effects of the appeal development arising from international flights, the evidence does not suggest that the combined climate change effects of the development would be contrary to planning policy on such matters, including the Framework, or that it would significantly affect the Government's statutory responsibilities in this regard. Furthermore, no breach of the development plan associated with carbon/climate change is cited in the relevant reason for refusal and none has been established as part of the appeal process.
102. Accordingly, for all of the foregoing reasons, having due regard to current national aviation policy and wider planning policy, including the development plan and the Framework, the proposed development would not have a significant or unacceptable effect on carbon/climate change.

Other Matters

103. Other topic areas considered during the Inquiry that are not expressly assessed above included Local Context, Health & Well Being, Ecology, Socio-Economic Impacts, and Surface Access (Road & Rail). Before assessing the planning balance, these are considered in turn, followed by any remaining matters raised by interested parties during both the planning application stage and the appeal process.

Local Context

104. The airport is located in a pleasant rural context. Hamlets, villages and small towns, many of which have conservation areas and listed buildings, are dispersed amongst countryside. Nonetheless, the operational development proposed in this case would all be well contained within the airport boundaries.

105. The only material effect apparent in the wider area would be from increased passenger flights over time. Other types of flight are not expected to increase to their current caps as a result, given that the overall limit on annual air transport movements would not change. The main consequences of this for local people are discussed above. Given the Panel's conclusions on these matters, it is not expected that the proposed development would alter the airport's rural context or affect nearby heritage assets in any way bearing in mind the current permitted use of the airport and its likely future use were the appeal to be dismissed.

Health & Well Being

106. The Health Impact Assessment (HIA) considers health impacts arising from noise and air quality both from airport operations and from surface access, and socio-economic factors. The ES and ESA conclude that health effects in terms of air quality would be negligible and that there would be a minor beneficial effect from a reduction in the number of people exposed to night-time air noise. The ES and ESA further conclude that the development would have a major beneficial effect on public health and wellbeing through generation of employment and training opportunities and provision for leisure travel.

107. Research underpinning the WHO ENG guidelines was considered as part of the HIA, and the ES and ESA have taken a more precautionary approach than those guidelines. Whilst criticisms are made by other parties, no alternative detailed assessment has been put forward that would cast doubt on the findings of the ES and ESA or indicate that the likely effects would differ from those assessed. The conclusions of the ES and ESA are considered reliable.

Ecology

108. Given the conclusions of the Air Quality sub-section, in light of the wider evidence, including the findings of the ES and ESA, and subject to the identified suite of mitigation to be secured via the UU and conditions, there is no good reason to believe that the appeal development would have any effects on biodiversity and ecology that would warrant the refusal of planning permission.

Socio-Economic Impacts

109. The ES and ESA demonstrate that the proposal would be of social and economic benefit by enabling increased business and leisure travel. Leisure travellers would benefit from increased accessibility to foreign destinations. Businesses would benefit through increased inward investment. The economy would benefit through increased levels of employment and expenditure. Associated with employment growth, training facilities would be supported. Representatives of business, including local and regional business organisations, transport operators, and the Stansted Airport College expressed their support for the proposal at the Inquiry. The social and economic benefits of the proposal are not disputed by the Council.

110. SSE and interested parties have questioned several of the assumptions made in the ES and ESA, including those regarding the level of job creation, the suitability of those jobs for local people and the effect of the proposal on the trade balance. The appellant has demonstrated, however, that the assumptions made in the ES and ESA are appropriate and robust. The evidence base that has been used and the modelling undertaken are also

questioned but these are sufficient to demonstrate the benefits. Furthermore, even if some of the assumptions made by SSE and interested parties proved to be correct, such as a lower level of job creation than expected, a considerable number of beneficial jobs would still be created.

111. It is likely that increased economic prosperity in the south-east and east of England would not be at the expense of growth elsewhere in the country but would rather assist the growth of the UK economy as a whole. There is no reason to believe that the development would divert investment from other parts of the country that need investment or prejudice the Government's 'levelling-up' agenda, particularly as the development seeks to meet an established need for airport expansion in the south-east of England.

Surface Access

112. As outlined above, both Highways England and Essex County Council withdrew from the appeal proceedings following the identification of a mechanism to secure the delivery of a suite of highways related mitigation. No objections have been made to the appeal scheme by Network Rail or by the rail operators that serve Stansted. Indeed, there is broad support from those quarters. There are, nonetheless, remaining concerns expressed by other parties, including SSE, regarding surface access.
113. Notwithstanding that criticism is made of the methodology, assumptions and evidence that has led the statutory highway authorities and rail operators to their respective current positions, they appear to be well founded, based on a good understanding of the operation of the airport and the surrounding surface access infrastructure, both rail and highway, including capacity and modal share. This includes in respect to dealing with two-way car trips and the likely effects of the development on the highway network through Stansted Mountfitchet and Takeley, which were the subject of considerable discussion at the Inquiry. No alternative traffic counts, surveys, modelling or comprehensive assessment of the potential effects of the development in respect to surface access have been put to the Panel.
114. The Framework states that development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. The evidence put to the Inquiry falls far short of demonstrating that this would be the case.
115. Subject to securing and delivering the range of proposed mitigation, which includes improvements to Junction 8 of the M11 and the Prior Wood Junction, as well as to the local road network and to public transport, the development would have no significant effects in terms of surface access. Moreover, Stansted Airport is and would continue to be well served by the strategic highway network and wide ranging public transport services, including its integrated rail, bus and coach stations.

Other Considerations

116. There was much discussion during the Inquiry and in written evidence about previous expansion at the airport and the conclusions of decision makers at that time. The last planning permission to increase the capacity of the airport was granted in 2008. Putting aside that previous applications did not involve

the form of development sought here, planning policy and other considerations have changed significantly since that time and it is not possible to draw any meaningful parallels with the consideration of this appeal.

117. Public engagement occurred in advance of the planning application, as set out in the Statement of Community Involvement (February 2018), the results of which informed the development now under consideration. Further extensive consultation took place at both the planning application and appeal stages and a significant number of responses have been received, both supporting and opposing the scheme, covering a range of topics. The Panel is satisfied that all statutory requirements have been met in these regards and that interested parties have had good opportunity to comment and engage with the planning application and appeal processes.
118. The planning application and appeal have progressed in accordance with normal process and procedure and there is no evidence before the Inquiry that suggests otherwise. It was necessary to hold the Inquiry using a virtual format in accordance with the Planning Inspectorate's Interim Operating Model and in light of restrictions in place as a result of the pandemic. This allowed the appeal to progress in an efficient and expedient way, whilst upholding the opportunity for interested parties to engage with the process. Indeed, many local people and organisations spoke at the Inquiry over several days. It would not have been appropriate to unnecessarily delay the appeal pending potential changes in Government or local policy. Appeals must be determined in accordance with the circumstances at the time of the decision.
119. The respective Secretaries of State were asked several times to recover the appeal for their own determination but declined to do so, determining that the issues involved are of no more than local significance. There is no requirement for appeals to be recovered and the Panel has properly considered the proposals on behalf of the Secretary of State, having had regard to all the evidence, including the case made by the Council and comments from local people. There is a statutory right to appeal planning decisions which is vital to the operation of the planning system and the public costs involved are not a material consideration.
120. In addition to the foregoing matters, concern has been expressed by a range of interested parties, including by Parish Councils. These cover a range of topics, including: local infrastructure, services and facilities, and their potential cost to the public sector; vibration; malodour; rat-running; public safety and risk; water resources, sewerage and flooding; wider pollution issues, including littering and from light; effects on agriculture; parking, including 'fly parking' and the cost of drop-off at the airport; demand for more housing, including affordable housing; the combined effects of planned airport development elsewhere; the 'monopoly' held by the appellant at the airport; the local economy being said to be over-reliant on the airport; current and potential future flight paths; the effects of stacking aircraft; the physical works proposed are said not to be needed to support the proposed changes to flight and passenger numbers; the existing quality of the airport, including security, management and size; a new airport should be developed in the Thames Estuary instead of the appeal scheme; damage to the highway network, including erosion, and to property; stress for residents and businesses associated with uncertainty over development and activity at the airport; and alleged aviation fuel dumping.

121. These matters are largely identified and considered within the Council officer's reports on the appeal development. They were also before the Council when it prepared its evidence and when it submitted its case at the Inquiry and are largely addressed in its evidence and in the various statements of common ground. The Council did not conclude that they would amount to reasons to justify withholding planning permission. The Panel has been provided with no substantiated evidence which would prompt us to disagree with the Council's conclusions in these respects subject to the UU and the imposition of planning conditions.
122. Some of the submissions from interested parties refer to potential interference with human rights. Given the foregoing conclusions, particularly in terms of the appeal process and the main issues, any interference with human rights that might result from the appeal being allowed would not be sufficient to give rise to a violation of rights under Article 1 of the First Protocol to the Convention, as incorporated by the Human Rights Act 1998.
123. Interested parties have also referred to a number of matters which are either not planning matters or not relevant to the appeal. These include property values, compensation claims, and the conduct and motives of the appellant and of Council members and officers. Any potential future development or further increase in capacity at the airport would require a further planning application which would be subject to the Council's consideration. The lawfulness or otherwise of past development at the airport is a matter for the Council, as local planning authority.

Planning Obligations

124. Planning obligations made under S106 of the Town and Country Planning Act 1990 as a Unilateral Undertaking, dated 26 March 2021 (the UU), were completed after the Inquiry closed in line with an agreed timetable. In the event that planning permission were to be granted and implemented it would be subject to the obligations of the UU, which would include the securing of:
- Noise Mitigation - a new enhanced sound insulation grant scheme for a defined area in the vicinity of the airport to replace existing measures. This would include a greater number of properties than the existing scheme through use of a lower noise contour;
 - Transport
 - Mechanisms and funding to secure improvements to Junction 8 of the M11 and to the Priory Wood Junction, local road network improvements and monitoring, and local bus service improvements;
 - The airport operator shall join the Smarter Travel for Essex Network;
 - Expanded Sustainable Transport Levy (to replace the existing Public Transport Levy) to be used to promote the use of sustainable transport by passengers and airport staff;
 - Enhanced rail users discount scheme, with higher rate of discount and revised eligibility;
 - Revised targets for mode share (applying 'reasonable endeavours' to achieve those targets) – non-transfer passenger mode share of 50% by public transport, of 20% (by 39mppa) and 12% (by 43mppa) by 'kiss and fly', and 55% (by 39mppa) of staff access by single occupancy private car; updated working arrangements for the airport's Transport Forum,

Airport Surface Access Strategy and Travel Plan; and a study of and pursuant improvements to the on-site bus and coach station;

- Skills, education and employment – continuance of the Stansted Airport Employment Forum and Combined Local Benefits, including the on-site education centre for local children and schools, the on-site airport Employment Academy, Stansted Airport College, and local supply chain support;
 - Community - a new, replacement Community Trust Fund to help mitigate any adverse health and / or quality of life effects arising from the development as a result of increased noise levels and a reduction in the amenity of local green spaces;
 - Air Quality and Ecology – protection and enhancement of environmentally sensitive sites, including air quality and ecological monitoring at the airport, Eastend Wood and Hatfield Forest, and pursuant compensation;
 - Water quality – retention of the requirement to monitor local watercourses; and
 - Monitoring – payments to support the Council’s costs associated with monitoring the UU’s planning obligations.
125. The Council has submitted detailed statements (the CIL Statements), which address the application of statutory requirements to the planning obligations within the UU and also set out the relevant planning policy support / justification. Having considered the UU in light of Regulation 122 of the CIL Regulations and Government policy and guidance on the use of planning obligations, we are satisfied that most of the obligations therein would be required by and accord with the policies set out in the CIL Statements.
126. The exception to this is the inclusion of Thaxted Primary School within the SIGS in Schedule 2 Part 1 of the UU, for the reasons outlined in the *Noise* section above. For those reasons, its inclusion is not necessary and as such does not accord with the CIL Regulations. Subject to this exception, the SIGS is necessary to ensure the development accords with national and local policy requirements to minimise and mitigate adverse noise impact and to avoid significant adverse impact.
127. Subject to the above noted exception, the Panel is satisfied that the remainder of the obligations are directly related to the proposed development, fairly and reasonably related to it and necessary to make it acceptable in planning terms. Furthermore, the UU and its terminology are sufficiently precise and enforceable.

Conditions

128. Conditions were suggested by all three main parties to the appeal in the event that planning permission were to be granted, and these have been taken into account in formulating the conditions imposed.
129. A five year period for the commencement of development has been imposed rather than the standard three year period promoted by the Council, to allow greater flexibility in light of the anticipated impact of the pandemic on the airport and wider aviation industry. Although not suggested by any party, it is

- also considered necessary in the interests of certainty to specify the plans approved and with which the development must accord.
130. A scheme of water resource efficiency measures is secured to minimise water consumption in accordance with Policy GEN2 of the ULP. It is also considered necessary to secure a surface water drainage scheme in order to avoid flooding as a result of the development.
 131. A Construction Environmental Management Plan is needed to minimise the impact of the works on neighbouring occupants and to ensure that acceptable living conditions are maintained in accordance with Policy GEN4 of the ULP.
 132. A Biodiversity Management Strategy is necessary in light of findings contained within the submitted ecological surveys. There is a need to conserve and enhance protected and priority species in accordance with statutory obligations and Policy GEN7 of the ULP.
 133. For the same reason, the mitigation and enhancement measures and/or works identified in the Preliminary Ecological Appraisal (Feb 2018), Preliminary Ecological Appraisal Update (October 2020) and Ecology Mitigation Strategy (February 2018), are necessary. The Preliminary Ecological Appraisal Update is referenced as the most up to date appraisal, which includes measures beyond those contained in the Ecological Mitigation Strategy, in particular, provisions for the protection of ground nesting birds. A licence will also be required from Natural England, who do not object to the appeal proposal, for the translocation of protected species.
 134. Condition 7 restricts noise emanating from aircraft in line with that permissible under the extant planning permission up to 35 million passengers per annum. After that, a progressive improvement in noise conditions is secured over time in line with the ES/ESA predictions to protect the living conditions of neighbouring occupants in accordance with Policy ENV11 of the ULP, and consistent with the APF's objective to share the benefit of improvements to technology with local communities.
 135. There are currently no noise restrictions imposed by planning condition for night flights and Stansted, as a designated airport, is controlled by separate night flight operating restrictions imposed by the DfT. These operate on a Quota Count system over a 6.5 hour night-time period, meaning that there is a 1.5 hour period that remains uncontrolled, beyond the 16 hour daytime period imposed by condition 7. In order to ensure certainty that the noise impacts of the development will be as anticipated in the ES/ESA, and to avoid harm to the living conditions of local residents, it is considered necessary to impose a night-time restriction by condition in this case, alongside the daytime restrictions and notwithstanding some existing DfT control.
 136. In order to clarify the terms of the planning permission and to ensure that the development and associated effects do not exceed those assessed, conditions are attached which restrict the total number of aircraft movements, the number of cargo air transport movements and passenger throughput during any 12 month period.
 137. There is dispute between the parties regarding whether and to what extent it is necessary to control the effects of noise, air quality and carbon arising from the development.

138. Condition 7, discussed above, satisfactorily secures a betterment in noise conditions over time so as to make the development acceptable, such that there is no need or justification for imposing further measures in respect to noise.
139. The effect of the development on local air quality is expected to be very small and would not put nationally prescribed air quality standards or limits at risk in the area. Nevertheless, the appellant proposes a condition to secure an Airport Air Quality Strategy that would be updated over time in a continued effort to minimise emissions and contribute to compliance with relevant limit values or national objectives for pollutants. The provision of electric vehicle charging points can also be secured by separate condition as a measure necessary to minimise air pollution associated with the development. This is considered sufficient to make the development acceptable in planning terms, in accordance with Policy ENV13 of the ULP and the objectives of the Framework.
140. International aviation emissions are not currently directly included in UK carbon budgets and Government policy is clear that there is sufficient headroom for MBU development at all airports, including Stansted. Carbon emissions associated with the development from sources other than international aviation are expected to be relatively small and would not themselves materially impact upon carbon budgets, including the planned sixth Carbon Budget which will directly include international aviation emissions, or otherwise conflict with the objectives of the Framework. As such, a condition limiting carbon is not necessary.
141. The appeal proposal accords with current policy and guidance and there is no evidence that it would compromise the ability of future generations to meet their own needs. The conditions discussed above are sufficient to make the development acceptable in planning terms.
142. The Council proposes alternative conditions to deal with noise, air quality and carbon. Its primary case involves a condition, referred to during the Inquiry as 'condition 15', which would impose restrictions based upon the impacts assessed in the ES/ESA, along with future more stringent restrictions (using some interpolated data from the ES/ESA) and a process that would require the Council's reassessment and approval periodically as the airport grows under the planning permission, allowing for a reconsideration against new, as yet unknown, policy and guidance. In light of the Panel's conclusions on these matters, there is no policy basis for seeking to reassess noise, air quality or carbon emissions in light of any potential change of policy that might occur in the future. Furthermore, it would be likely to seriously undermine the certainty that a planning permission should provide that the development could be fully implemented. This appeal must be determined now on the basis of current circumstances and the proposed 'condition 15' is not necessary or reasonable.
143. As an alternative to 'condition 15', two other conditions (dealing with air quality and carbon) are suggested by the Council. These would also impose future restrictions defined by the Council. Again, it follows from our conclusions on the main issues that these are not necessary to make the development acceptable in planning terms, so these have not been imposed.
144. It is also unnecessary to require an assessment of impacts of the full proposed airport expansion on 24-hour mean NO_x concentrations at Elsenham

Woods SSSI and Hatfield Forest SSSI given that this has not been requested by Natural England and the ES/ESA indicates that the development would not be significant in ecology terms.

145. SSE suggested a separate set of conditions, though many were broadly in line with those agreed between the Council and the appellant as considered above. No additional trigger for the commencement of development is needed as this permission must necessarily have been implemented for passenger numbers to exceed 35 million in any 12-month period. Noise restrictions beyond that imposed by condition 7 are suggested by SSE but these seek arbitrary limits with no certainty that they would be achievable. They are not necessary or reasonable in light of the Panel's findings as outlined above. Similarly, no evidence was put to the Inquiry which would justify imposing specific restrictions on helicopter movements. Publication of passenger throughput figures on the airport's website is not necessary to make the development acceptable, as conceded by SSE during the Inquiry.
146. SSE also sought a requirement for the provision of a taxi holding area close to the terminal to minimise unnecessary empty running, whereby taxis drop off at the airport but do not pick-up a return fare. A taxi company is already based at the airport and the appellant explained that it has recently provided a holding area within the mid-stay car park that might assist with such concerns. Regardless, extensive sustainable transport measures are secured by planning obligations so that a specific requirement of this type is unnecessary.
147. Additional air quality and carbon requirements to those sought by the Council were suggested by SSE but given the Panel's conclusions on these matters, these are not reasonable or necessary. Finally, SSE sought restrictions on future applications for development at the airport in terms of passenger numbers or a second runway, though recognised the difficulties of complying with the tests for conditions. Such restrictions are not relevant to the development being sought and would not be necessary or reasonable.
148. The wording of conditions has been amended as necessary to improve their precision and otherwise ensure compliance with the tests for conditions contained in the Framework. So far as the conditions require the submission of information prior to the commencement of development, the appellant has provided written confirmation that they are content with the wording and reasons for being pre-commencement requirements.

Planning Balance

149. The development plan, so far as it is relevant to this appeal, is the ULP. Although dated, it contains a number of policies¹⁸ relevant to this proposal which are not materially inconsistent with the objectives of the Framework and continue to provide a reasonable basis upon which to determine the appeal, alongside other material considerations.
150. Policy S4 of the ULP provides for development directly related to or associated with Stansted Airport to be located within the boundaries of the airport.
151. Policy ENV11 of the ULP seeks to avoid harm to noise sensitive uses. The evidence indicates that the overall effect of the proposal on aircraft noise would

¹⁸ Relevant ULP policies were reviewed by the Council and the appellant for the purposes of the appeal

- be beneficial. Even at their peak, noise levels would not exceed that permissible under the existing planning permission. After that, it is expected that noise would reduce as a result of factors such as fleet mix and advances in technology. This improvement in noise conditions over time can be secured by condition in line with Government policy to share the benefits of airport expansion with local communities. As such, there would be no conflict with Policy ENV11 or the similar objectives of the Framework to protect living conditions.
152. Not all development can have the effect of improving air quality and by its very nature, there would inevitably be some additional air pollution from the proposed development which must weigh against the proposal. However, the ES/ESA assesses the impacts as being negligible at all human receptors and no exceedances of the air quality standards are predicted for any of the pollutants at human receptors in the study area. NO_x concentrations at all ecological receptors are predicted to be below the critical level/air quality standard of 30µg/m³ for all scenarios tested. The predicted changes in nitrogen deposition at the Hatfield Forest SSSI and NNR and Elsenham Woods SSSI remain less than 1% of the sites' lower critical loads. Ongoing monitoring of air quality within the SSSIs is provided for within the submitted Unilateral Undertaking. Overall, there would be no material change in air quality as a result of the development. As such, there would be no conflict with Policy ENV13 of the ULP, which seeks to avoid people being exposed on an extended long-term basis to poor air quality; or the similar objectives of the Framework.
153. Carbon emissions are predominantly a matter for national Government and the effects of airport expansion have been considered, tested and found to be acceptable in MBU. It is clear that UK climate change obligations would not be put at risk by the development, including in light of the Government's 20 April 2021 announcement. Carbon emissions from other sources associated with the development, such as the operation of airport infrastructure, on site ground based vehicles and from people travelling to and from the site are relatively small and would be subject to extensive sustainable transport measures secured by conditions and obligations that would minimise impacts as far as possible. Therefore, this matter weighs against the proposal only to a limited extent and could not be said to compromise the ability of future generations to meet their needs, or otherwise conflict with the objectives of the Framework taken as a whole.
154. The Highway Authorities are satisfied that the development would not unacceptably affect highway safety or capacity and the Panel agrees. All infrastructure and mitigation measures required to make the development acceptable in planning terms can be secured by conditions or planning obligations. On this basis, there would be no conflict with ULP Policies GEN1, GEN6, GEN7, ENV7, ENV11 or ENV13 so far as they require infrastructure delivery or mitigation.
155. The Council and the appellant agree that the proposed development accords with the development plan, taken as a whole. It is further agreed that the Framework's presumption in favour of sustainable development should apply as a result of the proposals' accordance with an up-to-date development plan¹⁹.

¹⁹ Framework paragraph 11(c)

In these circumstances the Framework states that development should be approved without delay.

156. In addition, the scheme receives very strong support from national aviation policy. Taken together, these factors weigh very strongly in favour of the grant of planning permission. Furthermore, the development would deliver significant additional employment and economic benefits, as well as some improvement in overall noise and health conditions.
157. The Council has recently withdrawn its emerging Local Plan such that it has no prospect of becoming part of the development plan and attracts no weight in the determination of this appeal. There are a number of made Neighbourhood Plans in the local area, but none contain policies that have a bearing on the outcome of the appeal.
158. Overall, the balance falls overwhelmingly in favour of the grant of planning permission. Whilst there would be a limited degree of harm arising in respect of air quality and carbon emissions, these matters are far outweighed by the benefits of the proposal and do not come close to indicating a decision other than in accordance with the development plan. No other material considerations have been identified that would materially alter this balance.

Conclusion

159. In light of the above, the appeal is allowed.

Michael Boniface

INSPECTOR

G D Jones

INSPECTOR

Nick Palmer

INSPECTOR

APPEARANCES

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Wald, both of Queens Counsel

Instructed by Brian Ross, Deputy Chairman
of Stop Stansted Expansion (SSE)

They called²⁰

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Founder, Secretary and Trustee of The
Hundred Parishes Society and SSE Executive
Committee Member

Brian Ross²¹ BCom(Hons)
MBA FRSA MSPE

Deputy Chairman of SSE

Peter Lockley MA

Barrister

Michael Young BA(Hons)
FCA

SSE Executive Committee Member

Bruce Bamber BSc MA MSc
MCIHT

Director of Railton TPC Ltd

INTERESTED PERSONS:

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The Three Horseshoes Public House, Duton
Hill

Vere Isham

Broxted Parish Council

Dr Graham Mott

Elsenham Parish Council

Cllr Jenny Jewell

Great Canfield Parish Council

Neville Nicholson

Helions Bumpstead Parish Council

Dr Zoe Rutterford

Henham Parish Council & Chickney Parish
Meeting

Cllr Neil Reeve

High Easter Parish Council

Julia Milovanovic

Moreton Bobbingworth & The Lavers Parish
Council

Peter Jones

Stansted Mountfitchet Parish Council

Cllr Barrett

Stebbing Parish Council

Cllr Geoff Bagnell

Takeley Parish Council

Cllr Duncan McDonald

Much Hadham Parish Council

Richard Haynes JLL

Thaxted Parish Council

John Devoti

Howe Green and Great Hallingbury Residents
Chairman of East Hertfordshire Green Party

Alex Daar

The Aviation Environment Federation

Tim Johnson

New Economics Foundation

Alex Chapman

Local Resident

Jonathan Fox

Local Resident

Michael Belcher

Local Resident

²⁰ Although other proofs of evidence were submitted in support of SSE's case, including those of Peter Sanders CBE MA DPhil, Prof Jangu Banatvala CBE MA MD(Cantab) FRCP FRCPath FMedSci DPH, Martin Peachey MA(Cantab), John Rhodes MA(Oxon), Dr Claire Holman and Colin Arnott BA MPhil MRTPI, only the five witnesses listed were called to give evidence at the Inquiry

²¹ Mr Ross gave evidence in respect to the Inquiry topics of 'air traffic forecasting and predictions', 'socio-economic impacts' and 'planning matters'. For the latter of these topics he adopted the proof of evidence of Mr Arnott

Maggie Sutton	Local Resident
Simon Havers	Local Resident
Irene Jones	Local Resident
Mark Johnson	Uttlesford Green Party
Edward Gildea	Local Resident
Raymond Woodcock	Local Resident
Cliff Evans	Local Resident
George Marriage	Local Resident
Quintus Benziger	Local Resident
Jonathan Richards	Local Resident
Vincent Thompson	Local Resident
Peter Franklin	Local Resident
Roger Clark	Local Resident
Martin Berkeley	Local Resident
Suzanne Walker	Director of Policy, Essex Chamber of Commerce
David Burch	Director of Policy, Suffolk Chamber of Commerce
Andy Walker	CBI East
Freddie Hopkinson	Chair, Cambridge Ahead
Harriet Fear MBE	Executive Director, Visit East of England
Pete Waters	UK VP Strategy, AstraZeneca
Dr Andy Williams	UK Director, World Duty Free
Martyn Scarf	Managing Director, National Express
Chris Hardy	Director of Corporate Affairs, Greater Anglia
Jonathan Denby	Principal, Stansted Airport College
Karen Spencer MBE	The Easter and Rodings Action Group
Robert Beer	

SCHEDULE OF CONDITIONS FOR APPEAL REF APP/C1570/W/20/3256619:

1. The development hereby permitted shall be begun before the expiration of 5 years from the date of this decision.
2. Prior to reaching 35mppa, a scheme for the provision and implementation of water resource efficiency measures during the operational phases of the development shall be submitted to and approved in writing by the local planning authority. The scheme shall include the identification of locations for sufficient additional water meters to inform and identify specific measures in the strategy. The locations shall reflect the passenger, commercial and operational patterns of water use across the airport. The scheme shall also include a clear timetable for the implementation of the measures in relation to the operation of the development. The approved scheme shall be implemented, and the measures provided and made available for use in accordance with the approved timetable.
3. Prior to the commencement of construction works, a Construction Environmental Management Plan (CEMP) shall be submitted to and approved in writing by the local planning authority. The construction works shall subsequently be carried out strictly in accordance with the approved CEMP, unless otherwise approved in writing by the local planning authority.

The CEMP shall incorporate the findings and recommendations of the Environmental Statement and shall incorporate the following plans and programmes:

- (a) External Communications Plan
 - (i) External communications programme
 - (ii) External complaints procedure
- (b) Pollution Incident Prevention and Control Plan
 - (i) Identification of potential pollution source, pathway and receptors
 - (ii) Control measures to prevent pollution release to water, ground and air (including details of the surface/ground water management plan)
 - (iii) Control measures for encountering contaminated land
 - (iv) Monitoring regime
 - (v) Emergency environmental incident response plan
 - (vi) Incident investigation and reporting
 - (vii) Review/change management and stakeholder consultation
- (c) Site Waste Management Plan
 - (i) Management of excavated materials and other waste arising
 - (ii) Waste minimisation
 - (iii) Material re-use
- (d) Nuisance Management Plan (Noise, Dust, Air Pollution, Lighting)
 - (i) Roles and responsibilities
 - (ii) Specific risk assessment – identification of sensitive receptors and predicted impacts
 - (iii) Standards and codes of practice
 - (iv) Specific control and mitigation measures
 - (v) Monitoring regime for noise

- (e) Management of Construction Vehicles
 - (i) Parking of vehicles of site operatives
 - (ii) Routes for construction traffic

The CEMP shall include as a minimum all measures identified as "Highly Recommended" or "Desirable" in IAQM "Guidance on the assessment of dust from demolition and construction," Version 1.1 2014 commensurate with the level of risk evaluated in accordance with the IAQM guidance, for construction activities which are within the relevant distance criteria from sensitive locations set out in Box 1 and Tables 2, 3 and 4 of the IAQM guidance.

The CEMP shall provide for all heavy goods vehicles used in the construction programme to be compliant with EURO VI emissions standards, and for all Non Road Mobile Machinery to be compliant with Stage V emissions controls as specified in EU Regulation 2016/1628, where such heavy goods vehicles and Non Road Mobile Machinery are reasonably available. Where such vehicles or machinery are not available, the highest available standard of alternative vehicles and machinery shall be used.

4. Prior to commencement of the development, a detailed surface water drainage scheme for the airfield works hereby approved based on the calculated required attenuation volume of 256m³, shall be submitted to and approved in writing by the local planning authority. The approved scheme shall be fully implemented before any of the aircraft stands and taxiway links hereby approved are brought into use. The scheme shall be implemented in accordance with the approved details as part of the development, and shall include but not be limited to:
 - Detailed engineering drawings of the new or altered components of the drainage scheme;
 - A final drainage plan, which details exceedance and conveyance routes, and the location and sizing of any drainage features; and
 - A written report summarising the scheme as built and highlighting any minor changes to the approved strategy.
5. A Biodiversity Management Strategy (BMS) in respect of the translocation site at Monks Farm shall be submitted to, and approved in writing by, the local planning authority prior to the commencement of construction works. The BMS shall include:
 - Description and evaluation of features to be managed;
 - Ecological trends and constraints on site that might influence management;
 - Aims and objectives of management;
 - Appropriate management options for achieving aims and objectives;
 - Prescriptions for management actions;
 - Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five year period);
 - Details of the body or organisation responsible for implementation of the Strategy; and
 - Ongoing monitoring and remedial measures.

The Strategy shall also set out (where the results from monitoring show that conservation aims and objectives of the BMS are not being met) how

contingencies and/or remedial action shall be identified, approved by the local planning authority and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme. The BMS shall be implemented in accordance with the approved details.

6. All ecological mitigation and enhancement measures and/or works shall be carried out in accordance with the details contained in the Stansted – Ecology Mitigation Strategy (RPS, February 2018) forming part of Appendix 16.1 and 16.2 of the Environmental Statement and in the Conclusions and Recommendations of the Preliminary Ecological Appraisal Update (RPS, 5 October 2020), Appendix 16.A of the Environmental Statement Addendum.
7. The area enclosed by the 57dB(a) Leq, 16h (0700-2300) contour shall not exceed 33.9 sq km for daytime noise.

By the end of the first calendar year that annual passenger throughput exceeds 35million, the area enclosed by the following contours shall not exceed the limits in Table 1:

54 dB LAeq, 16hr	57.4 km ²
48 dB LAeq, 8hr	74.0 km ²

By the end of 2032 or by the end of the first calendar year that annual passenger throughput reaches 43million (whichever is sooner), Stansted Airport Limited, or any successor or airport operator, shall reduce the areas enclosed by the noise contours as set out in Table 2. Thereafter the areas enclosed by the contours as set out in Table 2, shall not be exceeded.

54 dB LAeq, 16hr	51.9 km ²
48 dB LAeq, 8hr	73.6 km ²

For the purposes of this condition, the noise contour shall be calculated by the Civil Aviation Authority’s Environmental Research and Consultancy Department (ERCD) Aircraft Noise Contour model (current version 2.4), (or as may be updated or amended) or, following approval by the local planning authority, any other noise calculation tool such as the Federal Aviation Administration Aviation Environmental Design Tool (current version 3.0c) providing that the calculations comply with European Civil Aviation Conference Doc 29 4th Edition (or as may be updated or amended) and that the modelling is undertaken in line with the requirements of CAA publication CAP2091 (CAA Policy on Minimum Standards for Noise Modelling). All noise contours shall be produced using the standardised average mode.

To allow for the monitoring of aircraft noise, the airport operator shall make noise contour mapping available to the local planning authority annually as part of demonstrating compliance with this condition. Contours should be provided in 3dB increments from 51 dB LAeq,16hr and 45 dB LAeq, 8hr.

8. The passenger throughput at Stansted Airport shall not exceed 43 million passengers in any 12 calendar month period. From the date of this permission, the airport operator shall report the monthly and moving annual total numbers of passengers in writing to the local planning authority no later than 28 days after the end of the calendar month to which the data relate.

9. There shall be a limit on the number of occasions on which aircraft may take-off or land at the site of 274,000 Aircraft Movements during any 12 calendar month period, of which no more than 16,000 shall be Cargo Air Transport Movements (CATMs). From the date of the granting of planning permission, the developer shall report the monthly and moving annual total numbers of Aircraft Movements, Passenger Air Transport Movements and CATMs in writing to the local planning authority no later than 28 days after the end of the calendar month to which the data relate.

The limit shall not apply to aircraft taking off or landing in any of the following circumstances:

- a) The aircraft is required to land at the airport because of an emergency, a divert or any other circumstance beyond the control of the operator and commander of the aircraft; or
 - b) The aircraft is engaged on the Head of State's flight, or on a flight operated primarily for the purposes of the transport of Government Ministers or visiting Heads of State or dignitaries from abroad.
10. Prior to the airport first handling 35mppa, an Airport Air Quality Strategy (AAQS) shall be submitted to and approved in writing by the local planning authority. The AAQS shall set out how the airport operator shall take proportionate action to contribute to compliance with relevant limit values or national objectives for pollutants through:
- a) Measures to minimise emissions to air from its own operational sources;
 - b) Measures to influence actions to be undertaken to improve air quality from third party operational sources; and
 - c) Measures that reduce emissions through the Airport Surface Access Strategy (ASAS), the Sustainable Transport Levy and the Local Bus Network Development Fund.

Thereafter, the AAQS shall be reviewed at the same time as the ASAS reviews (at least every 5 years or when a new or revised air quality standard is placed into legislation) and submitted to and be approved in writing by the local planning authority. At all times the AAQS shall be implemented as approved, unless otherwise approved in writing by the local planning authority.

11. Within 6 months of the date of this planning permission a scheme for the installation of rapid electric vehicle charging points at the airport shall be submitted to and approved in writing by the local planning authority. The scheme shall indicate the number and locations of the charging points and timetable for their installation. The approved scheme shall be fully implemented in accordance with the approved timetable and retained thereafter.
12. The development hereby permitted shall be carried out in accordance with the following approved plans: Location Plan: NK017817 – SK309; Site Plan: 001-001 Rev 01; Mike Romeo RET: 001-002 Rev 01; Yankee Remote Stands: 001-003 Rev 01; Runway Tango: 001-004 Rev 01 and Echo Stands: 001-005 Rev 01.

The Index of Multiple Deprivation (IMD2019): Headline findings for Kent

Related Documents

The [Deprivation and Poverty](#) web page contains more information which you may find useful.

- *Children in Poverty*
- *Homelessness*
- *Unemployment and benefits claimants*
- *Rough Sleepers*

NOTE: within this bulletin “Kent” refers to the Kent County Council (KCC) area which excludes Medway Unitary Authority

Contact details

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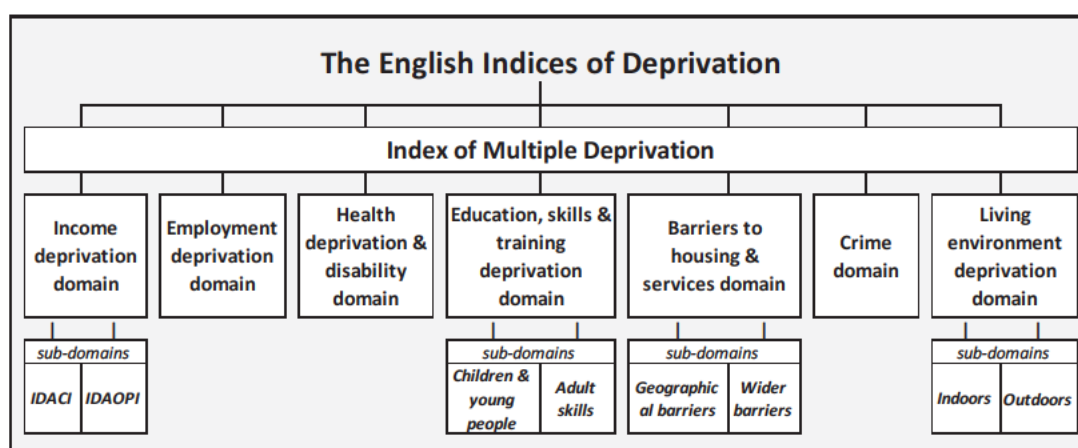
The Index of Multiple Deprivation (IMD2019) is the official measure of relative deprivation in England and is part of a suite of outputs that form the English Indices of Deprivation 2019 (IoD2019). This bulletin presents the findings for Kent.

- There are 901 Lower Super Output Areas (LSOAs) in Kent. A total of 555 remained within the same decile for IMD2019 as they were in IMD2015. This accounts for 62% of all Kent LSOAs.
- The number of Kent LSOAs that are within the 10% most deprived LSOAs in England between the IMD2019 and the previous IMD2015 remains at 51.
- The level of deprivation in nine out of 12 Kent local authority districts has increased since IMD2015 relative to other areas in England.
- Thanet continues to rank as the most deprived local authority in Kent.
- Tunbridge Wells continues to rank as the least deprived local authority in Kent.
- Tonbridge & Malling has experienced the largest increase in deprivation relative to other areas.
- Gravesham has experienced the largest decrease in deprivation relative to other areas.

Overview of the Indices of Deprivation 2019

The Indices of Deprivation 2019 (IoD2019) is produced by the Ministry of Housing, Communities and Local Government (MHCLG) and provides a set of relative measures of deprivation for neighbourhoods or small areas called Lower-layer Super Output Areas (LSOAs) across England.

The IoD2019 is based on 39 separate indicators, organised across seven distinct domains and 4 sub-domains of deprivation. These are combined and weighted to calculate the overall Index of Multiple Deprivation 2019 (IMD2019). The IMD2019 is the most widely used of these indices.



IDACI - Indices of deprivation affecting children index

IDAOPi - Indices of deprivation affecting older people index

The IMD2019, domain indices and the supplementary indices, together with the higher area summaries, are collectively referred to as the IoD2019.

Geography and spatial scale

The IoD2019 provides a measure of deprivation experienced by people living in each neighbourhood or LSOA. LSOAs were developed by the Office for National Statistics (ONS) before the 2011 Census. There are 32,844 LSOAs in England with an average of 1,500 residents each and are a standard way of dividing up the country. They do not have descriptive place names like local electoral wards or parishes do but are named in a format beginning with the name of the local authority district followed by a 4-character code e.g. Ashford 001A.

All LSOAs in England are ranked according to their level of deprivation relative to that of other areas. A rank of 1 being the most deprived and a rank of 32,844 being the least deprived.

High ranking LSOAs or neighbourhoods can be referred to as the 'most deprived' or as being 'highly deprived' to aid interpretation. However, there is no definitive threshold above which an area is described as 'deprived'. The

IoD2019 measure deprivation on a *relative* rather than an *absolute* scale, so an LSOA ranked 100th is more deprived than an LSOA ranked 200th, but this does not mean it is twice as deprived.

It is common to describe how relatively deprived a small area is by saying whether it falls among the most deprived 10 per cent, 20 per cent or 30 per cent of small areas in England (although there is no definitive cut-off at which an area is described as 'deprived').

To help with this, deprivation 'deciles' are published alongside ranks. Deciles are calculated by ranking the 32,844 small areas in England from most deprived to least deprived and dividing them into 10 equal groups. These range from the most deprived 10 per cent of small areas nationally to the least deprived 10 per cent of small areas nationally.

Summary measures have been produced for the following higher-level geographies:

- lower tier local authority districts – Local Authority
- upper-tier local authorities – Counties, Metropolitan counties, & Unitary Authorities
- local enterprise partnerships
- clinical commissioning groups.

The Data

As far as is possible, each indicator is based on data from the most recent time point available. Using the latest available data in this way means that there is not a single consistent time point for all indicators. However, in practice most indicators in the IoD2019 relate to a 2015/16 timepoint. As a result, the indicators do not take into consideration any changes to policy since the time point of the data used. For example, the 2015/16 benefits data used do not include the impact of the roll out of Universal Credit, which only began to replace certain income and health related benefits from April 2016.

Uses of the IMD and IoD

Since their original publication in 2000 the Indices have been used widely for a variety of purposes, including the following:

- Targeting resources, services and interventions
- Policy and strategy
- As an analytical resource to support commissioning by local authorities and health services, and in exploring inequalities.
- Funding bids

This bulletin presents the IMD2019 in comparison with IMD2015 at LSOA level in Kent and Medway. Summary measures for IMD2015 and IMD2019 at local authority and county level are also presented.

Due to the large number of LSOAs in Kent (902) the tables in this bulletin show only the most deprived 10% LSOAs in Kent. Full lists of all LSOAs in Kent & Medway with scores and ranks for all the domains are available in Excel format on request from Strategic Commissioning – Analytics.

e:-mail research@kent.gov.uk or telephone 03000 417444

The 2019IMD has not been made available at ward level. However following guidance from MHCLG we have produced a separate ward level IMD2019 summary that is available in a separate document.

Further information

Further information about the Indices of Deprivation 2019 is available from The Ministry of Housing, Communities and Local Government via their



www.gov.uk/government/statistics/english-indices-of-deprivation-2019

Deprivation at small area level in Kent's Lower Super Output Areas

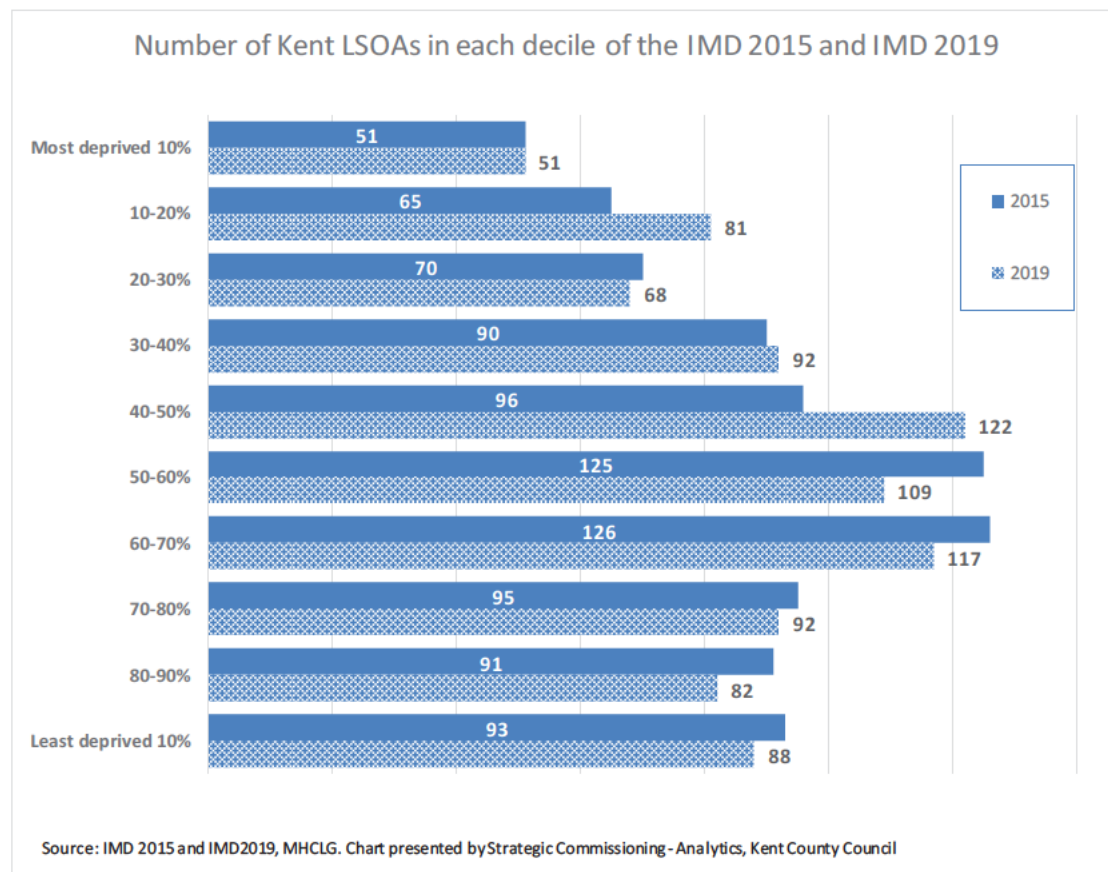
The number of Kent LSOAs that are within the 10% most deprived LSOAs in England between the IMD2015 and the IMD2019 remains at 51. Although there has been no direct increase in the number of the most deprived areas within Kent there have been changes within the lesser deprived areas

The number of Kent LSOAs within the 10 to 20% most deprived LSOAs in England has increased from 65 in 2015 to 81 in 2019. The number within the 40-50% most deprived have also increased from 96 to 122.

At the other end of the spectrum, the numbers of LSOAs within the 10% least deprived LSOAs in England has decreased from 93 in 2015 to 88 in 2019.

Chart 1 shows the changes in of Kent LSOAs within all of the deciles of the IMD2015 and IMD2019.

Chart 1: Number of Kent LSOAs in each decile of the IMD2015 and IMD2019



Thanet has the most LSOAs within the most deprived decile with 18. This figure has also remained the same since the IMD2015.

The number of Folkestone & Hythe LSOAs within the 10% most deprived has also remained the same between the IMD2015 and IMD2019.

Four local authorities have experienced an increase in the number of LSOAs within the most deprived decile. These are Swale (+2), Ashford and Dover (both with +1) and Canterbury which now has 2 LSOAs within the 10% most deprived LSOAs for IMD2019 when there were none in the IMD2015.

There has been a reduction in the number of LSOAs within the 10% most deprived within Dartford (-2) and Gravesham (-4). Sevenoaks, Tonbridge & Malling and Tunbridge Wells do not have any LSOAs within the 10% most deprived

Medway Unitary authority has also seen an increase in the number of LSOAs in the 10% most deprived LSOAs between IMD2015 and IMD2019.

Table 1: IMD2019 and IMD2015: Kent & Medway LSOAs within the top 10% most deprived in England

Authority	Total LSOAs in each Local Authority	Within the top 10% most deprived: IMD 2015		Within the top 10% most deprived: IMD 2019		2015 - 2019 Change Number of LSOAs
		Number	%	Number	%	
Kent	902	51	6%	51	6%	0
Thanet	84	18	35%	18	35%	0
Swale	85	14	27%	16	31%	2
Dover	67	4	8%	5	10%	1
Folkestone & Hythe	67	4	8%	4	8%	0
Canterbury	90	0	0%	2	4%	2
Gravesham	64	6	12%	2	4%	-4
Maidstone	95	2	4%	2	4%	0
Ashford	78	0	0%	1	2%	1
Dartford	58	3	6%	1	2%	-2
Sevenoaks	74	0	0%	0	0%	0
Tonbridge & Malling	72	0	0%	0	0%	0
Tunbridge Wells	68	0	0%	0	0%	0
Medway U.A.	163	12	24%	14	27%	2

Table ranked by highest number of LSOAs in top 10% most deprived by IMD2019 Score

* A minus change illustrates a reduction in the number of LSOAs within the 10% most deprived areas in England.

* A positive change illustrates an increase in the number of LSOAs within the 10% most deprived areas in England.

Source: The English Indices of Deprivation 2015 and 2019, Ministry of Housing, Communities and Local Government

Table presented by Strategic Commissioning - Analytics, Kent county Council

The change in numbers of LSOAs within each of the deciles does not identify which areas have improved or declined. Chart 2 presents the proportion of LSOAs that have remained within the same decile in IMD2019 as IMD2015.

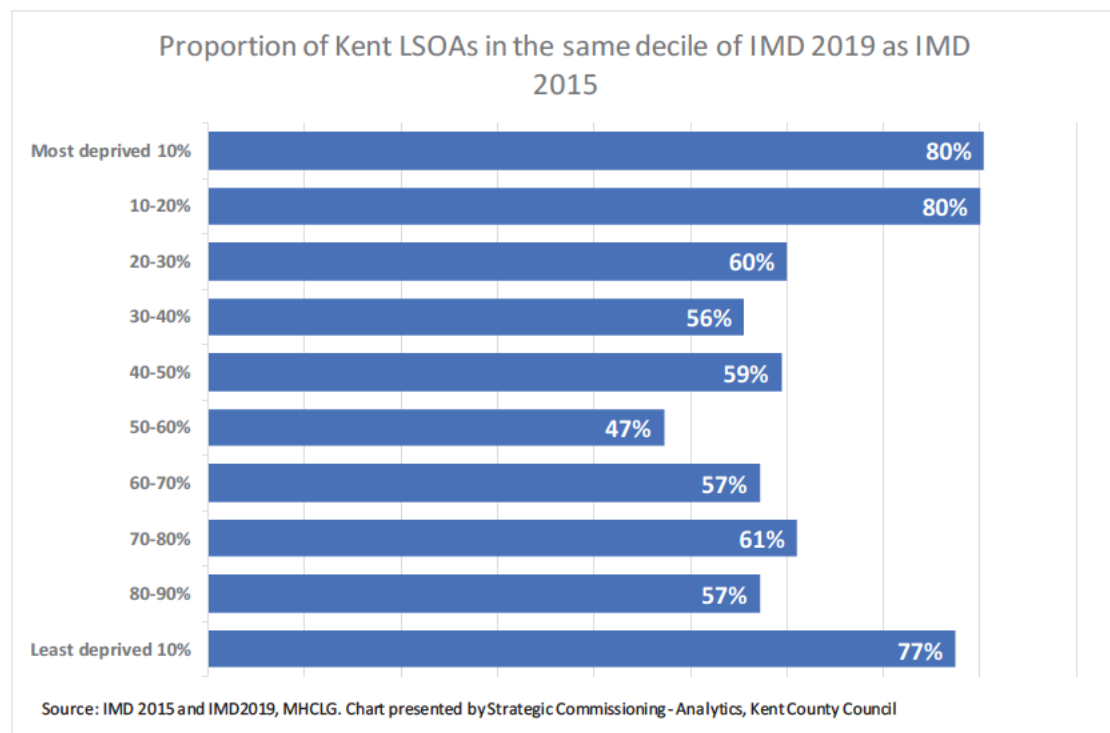
There are 901 LSOAs in Kent. A total of 555 LSOAs remained within the same decile for IMD2019 as they were in IMD2015. This accounts for 62% of all Kent LSOAs.

Of the 51 Kent LSOAs that were within the 10% most deprived LSOAs in England in 2019, 80% or 41 LSOAs remained in the 10% most deprived LSOAs for 2015. The same proportion of LSOAs were in the 10-20% most deprived in IMD2019 and IMD2015.

In contrast, only 77% of LSOAs within the least deprived 10% of LSOAs in 2019 were in the least deprived decile in 2015. This accounts for 72 LSOAs.

Only 57% of LSOAs within the 80-90% least deprived were in this decile for IMD2019 and IMD2015.

Chart 2: Proportion of Kent LSOAs in the same decile of the IMD 2019 and IMD2015



Maidstone has the highest number of LSOAs to remain in the same decile in IMD2019 as in IMD2015 with 62. This accounts for 65% of all LSOAs in Maidstone and is a higher percentage than for Kent as a whole.

Dartford has the lowest number and percentage of LSOAs to remain in the same decile in IMD2019 as in IMD2015 with 29. This accounts for 50% of all LSOAs in Dartford. Gravesham has the highest percentage of LSOAs to remain in the same decile in IMD2019 as in IMD2015 at 75%. This accounts for 48 LSOAs in Gravesham.

Table 2: LSOAs within the same deciles for IMD2015 as IMD2019

Authority	Total LSOAs in each Local Authority	LSOAs within the same decile in 2015 and 2019	
		Number	%
Kent	902	555	62%
Ashford	78	51	65%
Canterbury	90	51	57%
Dartford	58	29	50%
Dover	67	42	63%
Folkestone & Hythe	67	37	55%
Gravesham	64	48	75%
Maidstone	95	62	65%
Sevenoaks	74	48	65%
Swale	85	50	59%
Thanet	84	53	63%
Tonbridge & Malling	72	39	54%
Tunbridge Wells	68	45	66%
Medway U.A.	163	108	66%

Source: IMD2015 and IMD2019, MHCLG

Table presented by Strategic Commissioning - Analytics, Kent county Council

Of the 41 Kent LSOAs that remained in the 10% most deprived LSOAs for the IMD2015 and the IMD2019 the majority are in Thanet and Swale.

Thanet has the highest number of LSOAs to remain within the 10% most deprived decile in the IMD2015 and the IMD2019 with 16. This accounts for 19% of all LSOAs in Thanet.

Swale has the second highest number of LSOAs to remain within the 10% most deprived LSOAs for the IMD2015 and the IMD2019 with 14. This accounts for 16% of all LSOAs in Swale.

Ashford and Canterbury are the only local authorities to have LSOAs within the 10% most deprived decile of the IMD2019 when they had none in the IMD2015.

Sevenoaks, Tonbridge & Malling and Tunbridge Wells have no LSOAs within the 10% most deprived deciles of either the IMD2015 or the IMD2019.

Table 3: LSOAs within 10% most deprived deciles for IMD2015 and IMD2019

Authority	Total LSOAs in each Local Authority	LSOAs within 10% most deprived decile: IMD2015		LSOAs within 10% most deprived decile: IMD2019		LSOAs within 10% most deprived decile for both 2015 and 2019	
		Number	%	Number	%	Number	%
Kent	902	51	6%	51	6%	41	5%
Thanet	84	18	21%	18	21%	16	19%
Swale	85	14	16%	16	19%	14	16%
Dover	67	4	6%	5	7%	4	6%
Folkestone & Hythe	67	4	6%	4	6%	3	4%
Canterbury	90	0	0%	2	2%	0	0%
Gravesham	64	6	9%	2	3%	2	3%
Maidstone	95	2	2%	2	2%	1	1%
Ashford	78	0	0%	1	1%	0	0%
Dartford	58	3	5%	1	2%	1	2%
Sevenoaks	74	0	0%	0	0%	0	0%
Tonbridge & Malling	72	0	0%	0	0%	0	0%
Tunbridge Wells	68	0	0%	0	0%	0	0%
Medway U.A.	163	12	7%	14	9%	12	7%

Source: IMD2015 and IMD2019, MHCLG

Table presented by Strategic Commissioning - Analytics, Kent county Council

The 2019IMD has not been made available at ward level. However following guidance from MHCLG we have produced a separate ward level IMD2019 summary that is available in a separate document.

Table 4 and 4a indicates the wards in which the top 10% most deprived LSOAs in Kent are situated. This table also shows the national rank and Kent rank.

Table 4: The 10% most deprived LSOAs by IMD2019 in Kent: (Rank 1 to 45 out of 90)

2011 LSOA Name	2019 Ward Name	National rank			Kent Rank	
		position out of 32,844 LSOAs	Within top 10% most deprived 2019	Within top 10% most deprived 2015	Position out of 902 LSOAs	Within top 10% most deprived
Swale 001A	Sheerness	48	Yes	Yes	1	Yes
Thanet 003A	Margate Central	67	Yes	Yes	2	Yes
Thanet 001A	Cliftonville West	117	Yes	Yes	3	Yes
Thanet 001E	Margate Central	139	Yes	Yes	4	Yes
Thanet 013B	Newington	284	Yes	Yes	5	Yes
Swale 006A	Sheppey East	322	Yes	Yes	6	Yes
Swale 010C	Murston	337	Yes	Yes	7	Yes
Thanet 006D	Dane Valley	423	Yes	Yes	8	Yes
Swale 002C	Sheerness	457	Yes	Yes	9	Yes
Swale 006D	Sheppey East	591	Yes	Yes	10	Yes
Shepway 014A	Folkestone Harbour	614	Yes	Yes	11	Yes
Swale 002A	Sheerness	708	Yes	Yes	12	Yes
Swale 002B	Sheerness	771	Yes	Yes	13	Yes
Thanet 006E	Dane Valley	932	Yes	Yes	14	Yes
Thanet 013E	Northwood	933	Yes	Yes	15	Yes
Dover 011F	St Radigunds	994	Yes	Yes	16	Yes
Thanet 001B	Cliftonville West	1,033	Yes	Yes	17	Yes
Thanet 016D	Eastcliff	1,038	Yes	Yes	18	Yes
Swale 005C	Queenborough & Halfway	1,159	Yes	Yes	19	Yes
Swale 001B	Sheerness	1,205	Yes	Yes	20	Yes
Swale 004E	Sheppey Central	1,309	Yes	Yes	21	Yes
Thanet 001D	Cliftonville West	1,326	Yes	Yes	22	Yes
Shepway 003C	East Folkestone	1,356	Yes	Yes	23	Yes
Thanet 003E	Westbrook	1,563	Yes	Yes	24	Yes
Thanet 016E	Eastcliff	1,597	Yes	Yes	25	Yes
Swale 015D	Priory	1,639	Yes	Yes	26	Yes
Shepway 014B	Folkestone Central	1,761	Yes	Yes	27	Yes
Swale 001C	Sheerness	1,878	Yes	Yes	28	Yes
Dover 013B	Town & Castle	2,105	Yes	Yes	29	Yes
Dartford 001A	Temple Hill	2,133	Yes	Yes	30	Yes
Thanet 013A	Newington	2,242	Yes	Yes	31	Yes
Gravesham 001C	Northfleet North	2,278	Yes	Yes	32	Yes
Thanet 003D	Salme stone	2,342	Yes	Yes	33	Yes
Swale 002D	Sheerness	2,383	Yes	No	34	Yes
Swale 001D	Sheerness	2,411	Yes	Yes	35	Yes
Dover 011A	Buckland	2,450	Yes	No	36	Yes
Dover 012F	Town & Castle	2,473	Yes	Yes	37	Yes
Ashford 008C	Stanhope	2,474	Yes	No	38	Yes
Dover 011D	Whitfield	2,545	Yes	Yes	39	Yes
Thanet 005A	Garlinge	2,616	Yes	No	40	Yes
Thanet 004A	Cliftonville West	2,620	Yes	Yes	41	Yes
Gravesham 007A	Westcourt	2,760	Yes	Yes	42	Yes
Canterbury 001C	Heron	2,768	Yes	No	43	Yes
Maidstone 013A	Park Wood	2,915	Yes	Yes	44	Yes
Thanet 016C	Central Harbour	2,976	Yes	Yes	45	Yes

LSOAs were created in 2011 so LSOAs in Folkestone & Hythe Local Authority are still named Shepway

Source: English Indices of Deprivation 2019, Ministry of Housing, Communities and Local Government

A rank of 1 is the most deprived

Table presented by Strategic Commissioning - Analytics, Kent county Council

Table 4a: The 10% most deprived LSOAs by IMD2019 in Kent: (Rank 46 to 90 out of 90)

2011 LSOA Name	2019 Ward Name	National rank			Kent Rank	
		position out of 32,844 LSOAs	Within top 10% most deprived 2019	Within top 10% most deprived 2015	Position out of 902 LSOAs	Within top 10% most deprived
Shepway 003A	East Folkestone	3,047	Yes	No	46	Yes
Swale 010B	Milton Regis	3,069	Yes	No	47	Yes
Maidstone 013D	Shepway South	3,092	Yes	No	48	Yes
Canterbury 014B	Barton	3,152	Yes	No	49	Yes
Swale 006B	Sheppey East	3,175	Yes	Yes	50	Yes
Thanet 006C	Dane Valley	3,259	Yes	No	51	Yes
Thanet 015D	Eastcliff	3,342	No	Yes	52	Yes
Gravesham 002E	Riverside	3,550	No	Yes	53	Yes
Gravesham 011C	Singlewell	3,588	No	Yes	54	Yes
Maidstone 013E	Shepway South	3,643	No	No	55	Yes
Dover 013A	Town & Castle	3,655	No	No	56	Yes
Dartford 009A	Princes	3,657	No	No	57	Yes
Ashford 008B	Stanhope	3,686	No	No	58	Yes
Thanet 012C	Sir Moses Montefiore	3,690	No	No	59	Yes
Ashford 007F	Victoria	3,697	No	No	60	Yes
Thanet 003B	Margate Central	3,729	No	No	61	Yes
Canterbury 007B	Gorrell	3,794	No	No	62	Yes
Thanet 001C	Cliftonville West	3,804	No	Yes	63	Yes
Gravesham 002A	Central	3,918	No	Yes	64	Yes
Canterbury 009D	Seasalter	3,935	No	No	65	Yes
Canterbury 001B	Heron	3,976	No	No	66	Yes
Dartford 004C	Swanscombe	3,996	No	Yes	67	Yes
Canterbury 019A	Wincheap	4,014	No	No	68	Yes
Thanet 004B	Dane Valley	4,057	No	No	69	Yes
Maidstone 009C	High Street	4,066	No	No	70	Yes
Swale 014C	St Ann's	4,072	No	No	71	Yes
Shepway 014D	Folkestone Central	4,097	No	Yes	72	Yes
Shepway 004E	Folkestone Harbour	4,100	No	No	73	Yes
Gravesham 011D	Singlewell	4,102	No	Yes	74	Yes
Thanet 016B	Central Harbour	4,134	No	No	75	Yes
Dartford 001D	Temple Hill	4,208	No	Yes	76	Yes
Tonbridge & Malling 003A	East Malling	4,333	No	No	77	Yes
Maidstone 013B	Park Wood	4,406	No	Yes	78	Yes
Ashford 008A	Beaver	4,412	No	No	79	Yes
Sevenoaks 002A	Swanley St Mary's	4,465	No	No	80	Yes
Gravesham 003D	Riverside	4,535	No	No	81	Yes
Shepway 004B	East Folkestone	4,540	No	No	82	Yes
Swale 011D	Roman	4,579	No	No	83	Yes
Dover 006C	Aylesham, Eythorne & Shepherdswell	4,622	No	No	84	Yes
Shepway 014C	Folkestone Central	4,635	No	No	85	Yes
Swale 005B	Queenborough & Halfway	4,662	No	No	86	Yes
Dover 013E	Town & Castle	4,692	No	No	87	Yes
Thanet 013D	Northwood	4,709	No	No	88	Yes
Swale 003A	Minster Cliffs	4,759	No	No	89	Yes
Ashford 007B	Beaver	4,761	No	No	90	Yes

LSOAs were created in 2011 so LSOAs in Folkestone & Hythe Local Authority are still named Shepway
Source: English Indices of Deprivation 2019, Ministry of Housing, Communities and Local Government

A rank of 1 is the most deprived

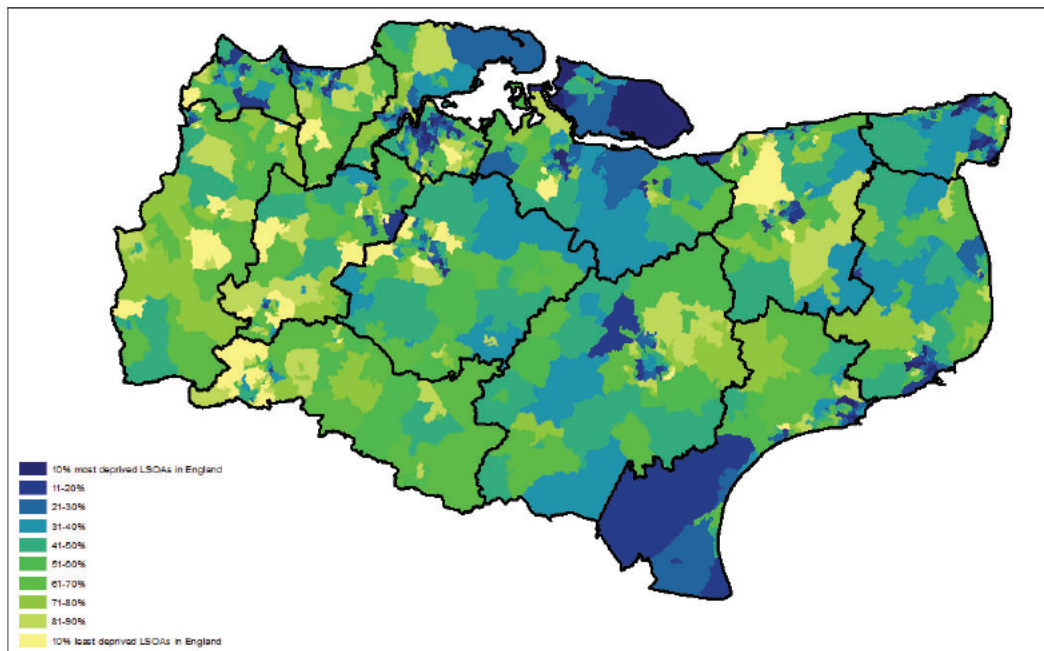
Table presented by Strategic Commissioning - Analytics, Kent county Council

Map 1 illustrates the pattern of deprivation across Kent and Medway at LSOA level. the darker areas are the most deprived areas and lighter ones are the least deprived areas.

The map shows there is an east west divide with the east of the county having higher levels of deprivation than the west.

The highest levels of deprivation can be seen in both coastal regions and urban areas.

Indices of Deprivation 2019 (IoD2019): Overall IMD2019
National rank of Lower Super Output Areas in Kent & Medway



Source: The English Indices of Deprivation 2019 (IoD2019); The Ministry of Housing, Communities & Local Government (MHCLG)
Map produced by Strategic Commissioning - Analytics, Kent County Council © Crown Copyright and database right 2019, Ordnance Survey 100019238

IMD2019 Summary measures for areas larger than LSOAs

The pattern of deprivation across large areas can be complex. In some areas, deprivation is concentrated in pockets of LSOAs, rather than evenly spread throughout. In some other areas the opposite picture is seen, with deprivation spread relatively evenly throughout the area, and with no highly deprived areas.

The set of summary measures have been published to help understand deprivation patterns for local authorities. No single summary measure is the 'best' measure. Each one highlights different aspects of deprivation, and each lead to a different ranking of areas. Comparison of the different measures is needed to give a fuller description of deprivation in a large area. In addition, it is important to remember that the higher-area measures are summaries; the Lower-layer Super Output Area level data provides more detail than is available through the summaries.

- **Average rank:** Population weighted average of the combined ranks for the LSOAs in a local authority. The nature of this measure means that a highly polarised larger area would not tend to score highly, because extremely deprived and less deprived LSOAs will 'average out'. Conversely, a larger area that is more uniformly deprived will tend to score highly on the measure.
- **Average score:** Population weighted average of the combined scores for the LSOAs in a local authority. The main difference from the average rank measure described above is that more deprived LSOAs tend to have more 'extreme' scores than ranks. So highly deprived areas will not tend to average out to the same extent as when using ranks; highly polarised areas will therefore tend to score higher on the average score measure than on the average rank.
- **Proportion of Lower-layer Super Output Areas (LSOAs) in most deprived 10% nationally.** By contrast to the average rank and average score measures, this measure focuses only on the most deprived LSOAs.
- **Extent:** Proportion of a local authority's population living in the most deprived LSOAs in the country. The extent measure is a more sophisticated version of the proportion of LSOAs in the most deprived 10 per cent nationally measure, and is designed to avoid the sharp cut-off seen in that measure, whereby areas ranked only a single place outside the most deprived 10 per cent are not counted at all.

- **Local concentration:** Population weighted average of the ranks of local authority's most deprived LSOAs that contain exactly 10% of the larger area's population. Similar to the proportion of LSOAs in the most deprived 10 per cent nationally and extent measures, the local concentration measure is based on only the most deprived LSOAs in the larger area, rather than on all areas. By contrast to these measures however, the local concentration measure gives additional weight to very highly deprived areas.

IMD2019 Summary measures for Kent Local Authorities

Recent boundary changes in England mean that the number of lower-tier (district, borough and unitary) authorities reduced from 326 in 2015 to 317 in 2019. The MHCLG have released the IMD2015 summary measures for local authorities cast to 2019 boundaries which enables us to provide a comparison with IMD2019 summary measures at local authority level.

Six out of twelve local authorities in Kent saw an improvement in at least one of the summary measures for local authorities in the IMD2019.

There were no improvements in any of the summary measures in Ashford, Dover, Folkestone & Hythe, Maidstone, Swale and Tonbridge & Malling for IMD2019.

Even though Thanet has seen improvements in the national rankings in three of the five summary measures, Thanet remains ranked as the most deprived local authority in Kent in all of the summary measures for local authorities in the IMD2019.

Swale is ranked as the second most deprived local authority in Kent across all summary measures. Sevenoaks and Tunbridge Wells rank as the two least deprived local authorities.

It is important to remember that any change in ranking is relative to changes in all local authorities in England between IMD2015 and IMD 2019.

Table 5: Kent local authorities by national rank of IMD2019 and IMD2015 summary measures for local authorities

Local Authorities	IMD - Rank of average rank (National)			IMD - Rank of average score (National)			IMD - Rank of proportion of LSOAs in most deprived 10% nationally			IMD - Rank of extent (National)			IMD - Rank of Local concentration (National)		
	2019	2015	change	2019	2015	change	2019	2015	change	2019	2015	change	2019	2015	change
Thanet	34	35	-1	30	28	2	37	35	2	42	44	-2	15	6	9
Swale	69	87	-18	56	77	-21	45	52	-7	81	91	-10	29	31	-2
Folkestone and Hythe	84	101	-17	90	110	-20	113	125	-12	99	123	-24	99	101	-2
Dover	107	113	-6	113	122	-9	102	125	-23	116	124	-8	109	124	-15
Gravesham	119	120	-1	123	120	3	146	89	57	112	116	-4	121	107	14
Dartford	145	167	-22	154	168	-14	170	131	39	163	168	-5	146	157	-11
Ashford	152	171	-19	158	174	-16	177	200	-23	155	167	-12	149	167	-18
Canterbury	185	182	3	179	181	-2	159	200	-41	158	165	-7	157	165	-8
Maidstone	188	203	-15	185	196	-11	161	168	-7	170	179	-9	166	171	-5
Tonbridge and Malling	236	269	-33	234	266	-32	195	200	-5	212	244	-32	210	244	-34
Sevenoaks	253	264	-11	251	260	-9	195	200	-5	228	222	6	244	234	10
Tunbridge Wells	273	271	2	274	274	0	195	200	-5	257	251	6	263	265	-2
Medway	98	117	-19	93	115	-22	93	109	-16	86	108	-22	86	104	-18

A negative change between 2015 and 2019 shows a rise in the rank therefore an increase in level of deprivation in relation to all other LAs Kent Local Authorities ranked on 2019 rank of average rank

Source: English Indices of Deprivation 2019, MHCLG, Table presented by Strategic Commissioning - Analytics, Kent County Council

A rank of 1 is the most deprived

National rank is out of 317 local authorities

IMD2019 Summary measures for upper tier local authorities

Recent boundary changes in England mean that the number of upper-tier local authorities (counties and unitary authorities) reduced from 152 in 2015 to 151 in 2019. The MHCLG have not released the IMD2015 summary measures for upper-tier local authorities cast to 2019 boundaries. As a result, we cannot provide a direct comparison of Kent by national rank between IMD2015 and 2019IMD.

However, as with the LSOAs, we can compare the deprivation 'deciles' for upper-tier local authorities. Deciles have been calculated by ranking the summary measure scores of the 152 upper tier local authorities in IMD2015 and the 151 upper tier local authorities in IMD2019 areas in England from most deprived to least deprived and dividing them into 10 equal groups. These range from the most deprived 10 per cent of small areas nationally (decile 1) to the least deprived 10 per cent of small areas nationally (decile 10).

Table 6: Ranks and deciles of summary measures for Kent: IMD2019 and IMD2015

IMD2019 Summary measure for upper-tier local authority	IMD2019		IMD2015	
	National Rank (out of 151 areas)	National Decile	National Rank (out of 152 areas)	National Decile
Rank of Average rank	95	7	104	7
Rank of Average score	93	7	100	7
Rank of proportion of LSOAs in most deprived 10% nationally	79	6	89	6
Extent	93	5	98	6
Local concentration	74	6	83	6

Source: English Indices of Deprivation 2019 MHCLG

Table presented by Strategic Commissioning - Analytics, Kent county Council

Kent has remained within the same national decile for IMD2019 as for IMD2015 for 4 of the 5 summary measures. Kent has moved up one decile on the extent measure which indicates that Kent is more deprived in this measure in 2019 than it was in 2015.

The number of local authorities within the South East region was not affected by the recent boundary changes therefore we are able to provide a comparison between the IMD2015 and IMD2019 based on the rankings of the 19 upper-tier local authorities within the South East region.

Kent is ranked within the least deprived 50% of upper-tier local authorities in England for 4 out of 5 summary measures of the IMD2019. A rank of 74 for the local concentration measure which puts Kent within the most deprived

50% of local authorities in England for this measure. Kent is ranked within the 50% most deprived areas within the South East on all summary measures.

Table 7: Kent local authorities by South East rank of IMD2019 and IMD2015 summary measures for upper-tier local authorities

County / Unitary Authority	IMD - Rank of average rank (South East)			IMD - Rank of average score (South East)			IMD - Rank of proportion of LSOAs in most deprived 10% (South East)			IMD - Rank of extent (South East)			IMD - Rank of Local concentration (South East)		
	2019	2015	change	2019	2015	change	2019	2015	change	2019	2015	change	2019	2015	change
Southampton	1	1	0	27	27	-0	1	1	0	1	1	0	2	2	0
Portsmouth	2	2	0	27	27	-0	2	2	0	2	2	0	1	1	0
Slough	3	3	0	23	23	0	13	13	0	10	10	0	10	5	5
Isle of Wight	4	4	0	23	23	0	9	8	1	5	5	0	8	4	4
Medway	5	6	-1	24	22	2	4	4	0	3	4	-1	4	6	-2
Brighton & Hove	6	5	1	21	23	-3	3	3	0	4	3	1	3	3	0
Reading	7	7	0	20	19	0	8	9	-1	8	9	-1	9	7	2
East Sussex	8	8	0	20	19	1	5	6	-1	6	8	-2	5	8	-3
Kent	9	9	0	20	19	1	6	7	-1	7	7	0	6	9	-3
Milton Keynes	10	10	0	18	18	-0	7	5	2	9	6	3	7	10	-3
West Sussex	11	11	0	14	14	0	10	11	-1	12	11	1	12	11	1
Hampshire	12	12	0	13	12	1	11	10	1	11	12	-1	11	12	-1
Oxfordshire	13	13	0	12	12	0	12	12	0	13	13	0	13	13	0
Bracknell Forest	14	14	0	10	10	-0	14	14	0	17	17	0	16	14	2
Buckinghamshire	15	16	-1	10	10	0	15	16	-1	16	14	2	15	16	-1
West Berkshire	16	15	1	10	10	-0	16	15	1	15	15	0	18	15	3
Surrey	17	17	0	10	9	1	17	17	0	14	16	-2	14	17	-3
Windsor & Maidenhead	18	18	0	8	9	-0	18	18	0	18	18	0	17	18	-1
Wokingham	19	19	0	6	6	0	19	19	0	19	19	0	19	19	0

A negative change between 2015 and 2019 shows a rise in the rank therefore an increase in level of deprivation in relation to all other LAs

Table sorted by rank of average rank

Source: English Indices of Deprivation 2019 MHCLG

Table presented by Strategic Commissioning - Analytics, Kent County Council

A rank of 1 is the most deprived (out of 19 counties and unitary authorities in the South East)

Conclusion

The IoD2019 have been produced using the same approach, structure and methodology used to create the previous IoD2015 (and the 2010, 2007 and 2004 versions). This allows some comparisons to be made over time between the IoD2019 and previous versions, but only in terms of comparing the **rankings** and **deciles** as determined at the relevant time point by each of the versions.

Just because the overall rank may or may not have changed between the Indices, it does not mean that there have been no changes to the level of deprivation in the area. For example, if the absolute levels of deprivation in all areas were increasing or decreasing at the same rate, the ranks would show no change.

Equally, when comparing the overall IMD, if improvements in one domain are offset by a decline in another domain, the overall IMD position may be about the same even if significant changes have occurred in these two underlying domains.

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Table 1 Selected Equations in the above relations on the form

Table with 2 columns: Equation number and Equation. It lists several mathematical equations related to health and population statistics.

Life actions

Definition: The facts of being health inequalities

Can life be defined for a complex in a set of relations? ... These include the relations: health and life, or more, such that relations in the population ...

Conclusion

Reason: as a set of relations of all kind of people ... health means more ...

Related content

A grid of four article thumbnails with titles like 'Health and life in a complex system', 'Health and life in a complex system', 'Health and life in a complex system', and 'Health and life in a complex system'.

Comments

A large text area containing several comments from users. Each comment includes a date, a user profile picture, and the text of the comment. The comments discuss the relationship between health and life in complex systems.

You may also be interested in

A row of four article thumbnails with titles like 'The health of people in a complex system', 'Health of Complex Systems in a Complex System', 'Complexity and Health', and 'Health of Complex Systems in a Complex System'.

A footer area containing navigation links such as 'Home', 'About', 'Contact', and 'Privacy Policy', along with a search bar and social media icons.

All practices in crisis town restrict patient lists over patient safety concerns

All practices in an under-doctored seaside town in Kent have restricted new patient registrations due to concerns over patient safety.

Five practices in Ramsgate are refusing new patients and redirecting them to the local CCG – which then assigns them to a practice that has capacity – after struggling to attract staff for a number of years.

It follows a similar situation for practices in Folkestone, Kent, last year, where several practices were allowed to refuse to register any new patients, due to recruitment and funding problems.

Three of the practices said the decision to refuse patients was as a result of concerns for patient safety – with one pointing out its patient list of 8,000 is served by just two GPs, far above the national average of 1,800 per GP.

They have adopted a system known as ‘managing’ patient lists, meaning GPs are not in breach of their contract and can avoid applying to NHS England to close their list entirely.

Local commissioners said recruitment of GPs ‘remains a significant challenge for Thanet’s GP practices’ and that the CCG is supporting practices to develop new models of care.

In letters sent to patients, and seen by [The Isle of Thanet News](#), Newington Road Surgery, Dashwood Medical Centre and The Grange Practice said they had taken the decision to refuse new registrations due to safety concerns caused by unmanageable patient demand.

[The areas where general practice is on the brink of collapse](#)

GPs at Newington Road Surgery said: ‘We came to this decision based on clinical safety reasons. We currently have nearly 8,000 patients and just two GPs, almost 4,000 patients per GP. The national average is 1,800 per GP.’

‘We have been advertising for a new GP to join our team since August 2015 without success. This is a situation echoed in practices locally and nationally.’

'Junior doctors do not see general practice as an appealing prospect and many experienced GPs are burnt out through pressure of work and are leaving the profession. Some local surgeries have closed down recently, adding additional pressures on the remaining few.'

Similarly, a letter from Dashwood Medical Centre said the surgery has 10,400 patients for just three full-time equivalent GPs.

Meanwhile, The Grange Practice, with 12,000 patients, said in a letter: 'We have been advised by NHS England's Kent and Medway area team, that we may register new patients but we are not obligated.'

The practice added it will only accept new patients every month that coincided with the number of patients deregistering over the same period.

Kent LMC medical secretary Dr John Allingham told Pulse that Thanet is among the regions in England that have suffered the most from GP shortages.

He said: 'Kent as a county has struggled to recruit GPs for many years. The Thanet area, which includes Ramsgate, is one of the most under-doctored areas in the country and also has areas of significant deprivation similar to many other coastal communities.'

He said the LMC had been advising practices for many years on how to 'list manage', and that a similar situation had occurred in [Folkestone a few years ago](#).

He added: 'Kent LMC are engaging with the practices and the CCG and a meeting has been arranged to consider what support can be given to the practices to try and manage this situation.'

Kent CCGs' managing director Caroline Selkirk said: 'The recruitment of GPs remains a significant challenge nationally, and for Thanet's GP practices. Although GP practices are responsible for recruiting their own staff, NHS Thanet CCG continues to support all our practices to develop new models of care to support GPs and help improve patient access to healthcare.'

'The five GP practices in Ramsgate have all been "list managing" since 2017, although not all of these practices have seen an increase in their list sizes over the last year.'

She added: 'Practices can refuse to accept new patient registrations but this must be all new requests to register to avoid any discrimination.'

Ms Selkirk said the opening of the Kent Medical School in 2020 'will support our efforts to recruit more GPs locally in the future'.

A Pulse investigation earlier this year [revealed GP surgery closures have risen almost eight-fold in six years, hitting record levels in 2018](#), with GPs pointing to recruitment issues and escalating workloads as the reasons for the rise.

Thanet GP shortage fourth worst in England as doctor warns of 'impossible and dangerous' situation

A shortage of GPs in Thanet is leading to an “impossible and dangerous situation”, a doctor has warned.

New NHS figures reveal the Isle to be the fourth worst area in the country for the number of GPs per patient, with just one doctor for every 2,500 people.

The alarming statistics put the Isle among the bottom 2% in England.

Dr Coral Jones, a member of the Save Our NHS in Kent (SONIK) campaign group, has now called on the NHS to rethink its strategy in light of the numbers.

There is just one GP for every 2,522 patients in Thanet which is almost double that of the best area in the country - Rushcliffe in Nottinghamshire.

In 2015, there was a total of 98 GPs working in the district but the latest figures compiled last September showed there was now just 69 - a fall of nearly a third.

Only Bradford, Horsham and Mid Sussex and Kent neighbours Swale had a higher proportion of GPs per patients.

The numbers showed Swale is the worst in the country with 3,342 patients for every doctor. This is three times worse than Rushcliffe which has just 1,192 patients per GP.

But the number of nurses working in Thanet is at a three-year high increasing from 56 in 2015 to 62 last year.

Dr Jones said: "This is a dangerous situation and requires immediate action by NHS bosses including urgent investment in primary care.

"Where there are large numbers of patients per doctor, GPs will become stressed and burnt out, practice staff demoralised and it is dangerous if patients are unable to reach care when needed.

"Health workers want to do their best for patients, not limit access. As a doctor, it's an impossible situation."

Dr Jones said the number of surgeries in Thanet had already been slashed by a third in the last three years leaving just 14 open as the NHS plans more cuts by introducing "three centralised health care superhubs".

She said losing services in areas like Thanet and Swale "is not the answer" especially when it they are areas with high medical demands, poor transport links and high levels of deprivation.

Dr Jones added: "Thanet and Swale include some of the most deprived parts of the country. Deprivation and social inequality, especially among older residents, cause poor health. Thanet and Swale need more health and social care located in the neighbourhood, not less.

"We need to fund modern premises, training for all staff in a practice and the resources to build up community health teams for integrated local care.

"This is the only way we will attract and keep GPs, while at the same time ensuring good treatment for patients."

East Cliff Practice in Ramsgate and Birchington Medical Centre are both currently advertising for new GPs.

Caroline Selkirk, managing director of east Kent CCGs, said: "We know that the recruitment of GPs remains a significant challenge for local GP practices that are responsible for recruiting their own staff.

"However, not all care needs to be provided by a GP and a GP practice will recruit a broad range of clinicians to meet their patients' needs.

"NHS Thanet CCG continues to work with all our practices to help make sure patients have access to the right type of clinician when they need it.

"We have helped groups of GP practices set up Extended Primary Care Networks to offer a number of additional services across Thanet. For instance, the Acute Response Team provides an immediate response for patients who can be cared for at home with an appropriate care package to relieve pressure on local GPs.

"The Thanet area has also recently recruited two GPs through the International GP recruitment project. A third wave of recruitment is set to start in March.

"The opening of the Kent Medical School scheduled for 2020 will also support our efforts to recruit locally in the longer term."

The crisis across Kent has been highlighted in an analysis by KentOnline showing five out of the county's eight NHS areas being ranked in the lowest 9% in the whole country.

All of Kent's clinical commissioning groups (CCGs) were in the lowest third nationally with Canterbury and Coastal CCG - covering Canterbury, Whitstable and Herne Bay - the best area in Kent with 1,942 patients per doctor and ranking in the lowest 29%.

South Kent Coast CCG (which covers Folkestone, Dover, Deal and Romney Marsh) was in the bottom 20% with 2,047 patients per doctor while West Kent CCG (Tonbridge, Maidstone and Sevenoaks and Tunbridge Wells) has one GP for every 2,123 patients.

Overall in Kent, there are 101 fewer GPs in the county compared to 2015. The latest figures show Kent has 1,093 doctors.

Surgeries in the county are trying to recruit new GPs with 20 vacancies listed on the Kent Local Medical Committee website.

But this falls well short of the 181 doctors needed to reach the national average, documents have revealed.

Kent lost 39 GPs in a year between September 2017 and the same month last year, papers due to be discussed by county councillors showed.

The number of nurses countywide has dropped by 29 from 744 in 2015 to 715 in 2018.

Practice managers across the county are struggling to fill vacant GP posts with more than half (53%) unfilled after "at least a year", 12% of all GP posts vacant and locum doctors making up 8% of the workforce.

All nurse vacancies in Kent and Medway have been vacant for more than six months with the number of nurses countywide dropping by 29 from 744 in 2015 to 715 in 2018.

NHS leaders will present a report to county councillors at County Hall in Maidstone on Friday outlining a 12-point plan costing £1.5 million.

The plan's aims include an "international GP and primary care recruitment campaign", introducing and developing new roles through the Kent and Medway Medical School, leadership schemes and flexible working schemes to reduce the number of locum posts into full-time positions.



STATISTICS

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If you are thinking of moving to Isle of Thanet or just want to know a what the area is like, the statistics on this page should give you a good introduction. They cover a range of socio-economic factors so you can compare Isle of Thanet to figures for Kent and nationally. These statistics can tell you if Isle of Thanet is an economically deprived area and how hard it might be to get a job.

Isle of Thanet General Health Statistics

The respondents of the 2011 Census were asked to rate their health. These are the results for Isle of Thanet. The percentage of residents in Isle of Thanet rating their health as 'very good' is less than the national average. Also the percentage of residents in Isle of Thanet rating their health as 'very bad' is more than the national average, suggesting that the health of the residents of Isle of Thanet is generally worse than in the average person in England.

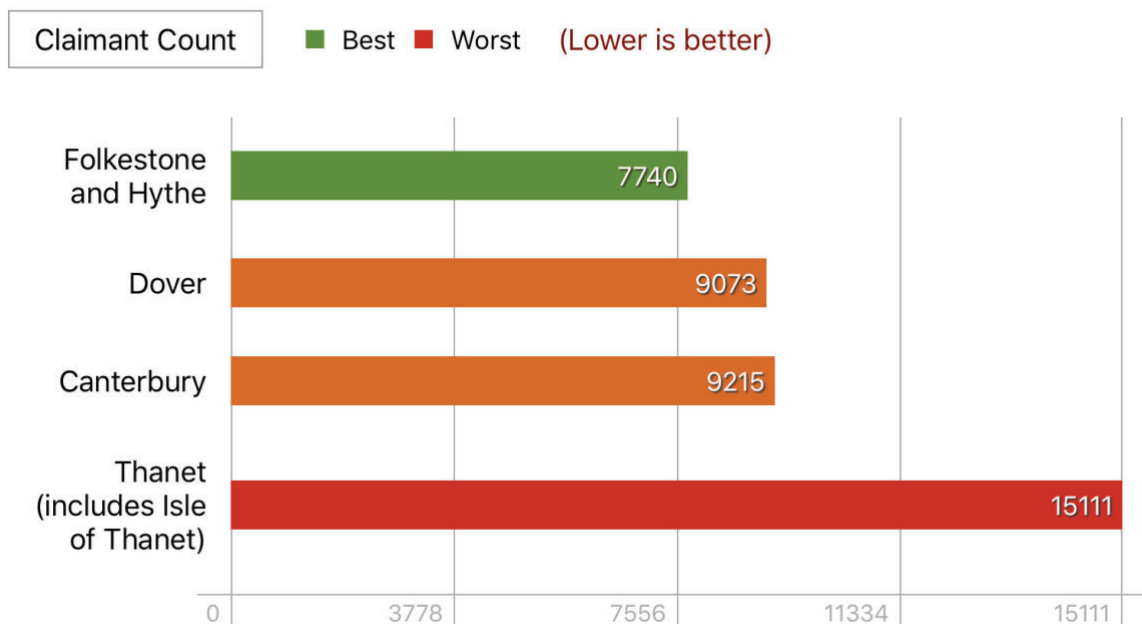
HEALTH	THANET	KENT	ENGLAND
Very Good	40.72%	46.68%	47.17%
Good	35.11%	34.87%	34.22%
Fair	16.68%	13.32%	13.12%
Bad	5.80%	4.00%	4.25%
Very Bad	1.70%	1.14%	1.25%

Isle of Thanet Education Statistics

These statistics are for the highest level education obtained by the residents of Isle of Thanet and are from the UK Census of 2011. Isle of Thanet has a high level of residents with either no qualifications or qualifications equal to 1 or more GCSE at grade D or below, than the national average.

QUALIFICATION	THANET	KENT	ENGLAND
No Qualifications	28.4%	22.5%	22.5%
Level 1	14.8%	14.7%	13.3%
Level 2	16.4%	16.9%	15.2%
Apprenticeship	3.9%	3.8%	3.6%
Level 3	11.3%	12.3%	12.4%
Level 4	19.6%	24.7%	27.4%
Other	5.6%	5.1%	5.7%

Universal Credit Benefit Statistics for Isle of Thanet



BENEFIT	THANET	KENT	ENGLAND
Jobseekers Allowance (only)	5.4%	2.7%	3.3%
Incapacity Benefits (IB or ESA)	3.2%	2.1%	2.4%
Any Benefit (includes in work benefits)	20.9%	12.6%	13.5%

Isle of Thanet Social Grade & Occupation Statistics

Social grade is a classification based on occupation and it enables a household and all its members to be classified according to the job of the main income earner. Isle of Thanet has 20% less Higher and Intermediate managerial, administrative or professional households than the national average.

GRADE	THANET	KENT	ENGLAND
AB	15.88%	22.42%	22.96%
C1	29.38%	31.89%	30.92%
C2	23.59%	22.46%	20.64%
DE	31.14%	23.22%	25.49%



Ramsgate Active
EDUCATION FOUNDATION

Ramsgate Active Education Foundation
Unit 69, The Oaks, Manston Business Park, CT12 5FS

To whom it may concern

Ramsgate Active Education Foundation aim to utilise exercise and activity to enhance education employment opportunities for children in Thanet, which is one of the most deprived areas in the country. We have a first hand and sharp insight into the types of deprivation suffered by many families in this area of Thanet. This is in part due to lack of jobs, high unemployment and the number of parents on benefits. A reopened Manston Airport with many new jobs could make a significant difference to the lives and employment prospects of the children they work with and their parents.

Our community has amongst the lowest overall levels of employment in Kent and ranks lowly in employment tables of sixteen- to twenty-four-year-olds in the Southeast. Critically, average earnings in our area are amongst the worst in the country and this is a huge barrier in helping children aspire to work.

Collaborations and partnerships with local employers and educators are critical in helping us achieve our goals and it's a frustration to us that there is not a greater culture of philanthropy amongst the organisations in our district. This in itself is a big barrier to improving the education and employment prospects of our young people. The greatest obstacle is the lack of high paid working opportunities in our location. This has been exacerbated with the demise of the port, airport and relocation of Pfizer away from our towns.

RSP has been a breath of fresh air and have become one of our closest partners. The values of the individuals within their management team and the culture of the organisation as a whole are strongly aligned to our own vision. This is to create aspiration and ultimately improve the prospects of youngsters within our district. In October, they funded and partnered with us to deliver a health, activity and food programme to over one hundred children on benefit related free school meals.

Reg Charity No 1194833



Ramsgate Active
EDUCATION FOUNDATION





Ramsgate Active
EDUCATION FOUNDATION

During these four days the children benefited from healthy hot meals and snacks and enjoyed a carousel of activities. These were strongly aligned to our understanding that active children have an increased chance of being successful in education and employment. RSP were able to add unique value to these activities with the inclusion of a flight simulator to this carousel which was operated by a pilot. This did not only provide a fun workstation but also gave an induction to a high paid job that offers the opportunity of global travel who do not often leave the square mile of their home and school. Our aim is for this to show them that a wider world exists and fill the youngsters with the desire to aspire to more. Around this station we were also able to demonstrate to the children the full range of jobs associated with the aviation industry. For many of us this highlighted just how a thriving airport could aid employment and life prospects in our area.

Many of the children growing up in our community do not benefit from the same treats and experiences that those raised in other districts take for granted. As a charity we want our kids to enjoy these. We also recognise that providing them can raise the appropriate level of trust required from parents, teachers and children to ensure our community programmes are well attended. Again, the management at RSP share these beliefs and have partnered with us to fund a winter wonderland and HAF programme over the Christmas period. Their funding will allow one hundred and seventy-five local children in deciles one to three of deprivation to enjoy: an ice-skating rink, a trip to Santa's grotto, a visit to Peter Pan pantomime at the local theatre and a Christmas dinner and disco. Again, it is our aim that showing these children that these treats and experience exist will fill them with the aspiration and curiosity required to enjoy them through their life journey.

Our relationship with RSP is a great example of how companies and charities can collaborate to help achieve charitable aims and we sincerely hope that they can continue to partner with us for the foreseeable future.

Yours Faithfully



James Lawson

Ramsgate Football Club Chairman

Reg Charity No 1194833



Ramsgate Active
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