



Manston Airport – Application for Non-material Change to Order

Environmental Appraisal

PREPARED FOR

RSP

DATE

September 2026

REFERENCE

0762883



DOCUMENT DETAILS

The details entered below are automatically shown on the cover and the main page footer. PLEASE NOTE: This table must NOT be removed from this document.

DOCUMENT TITLE	Manston Airport – Application for Non-material Change to Order
DOCUMENT SUBTITLE	Environmental Appraisal
PROJECT NUMBER	0762883
DATE	September 2026
VERSION	01
AUTHOR	ERM
CLIENT NAME	RiverOak Strategic Partners

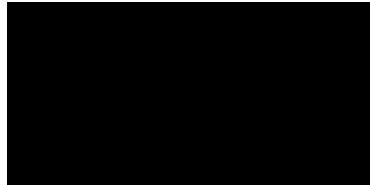
Manston Airport – Application for Non-material Change to Order

Environmental Appraisal

0762883



Partner



Managing Consultant

Environmental Resources Management
Limited

2nd Floor, Exchequer Court

33 St Mary Axe

London

EC3A 8AA

© Copyright 2026 by The ERM International Group Limited and/or its affiliates ('ERM'). All Rights Reserved.
No part of this work may be reproduced or transmitted in any form or by any means, without prior written permission of ERM.

CONTENTS

1.	INTRODUCTION	1
2.	PROPOSED NON-MATERIAL CHANGE	1
3.	METHODOLOGY	2
4.	CONCLUSION	1

LIST OF TABLES		
TABLE 3-1	ENVIRONMENTAL APPRAISAL	1

1. INTRODUCTION

RiverOak Strategic Partners Limited obtained development consent for the reopening and redevelopment of Manston Airport through the Manston Airport Development Consent Order (the DCO), which was granted by the Secretary of State in August 2022, and which came into force on 8 September 2022. The DCO authorises the redevelopment and operation of Manston Airport as an airport development alongside associated airport infrastructure, cargo facilities, and highway improvements. The DCO was supported by an Environmental Statement (ES) prepared in accordance with relevant requirements of the Infrastructure Planning (Environmental Impact Assessment) Regulations at the time of submission. The EIA process considered the potential and likely significant environmental effects associated with each phase of the authorised development (construction, operation and eventual decommissioning). Environmental mitigation and management measures were secured through the DCO Requirements, other certified documents and detailed in the Register of Environmental Actions and Commitments (REAC).

The Applicant is seeking a non-material change to the DCO, in part, to extend the period within which the authorised development must be commenced. No changes are proposed to the nature, scale, footprint, design, operational characteristics or mitigation associated with the authorised development.

This Environmental Appraisal has been prepared to consider whether the proposed amendment could give rise to any new or material likely significant effects when compared with those assessed within the ES and subsequently secured through the DCO. In addition to the findings of the ES, consideration has also been had to commitments outlined in the REAC during the examination period.

2. PROPOSED NON-MATERIAL CHANGE

Requirement 2 of the DCO currently requires the authorised development to commence within five years of the DCO coming into force i.e. 5 years from the 8th of September 2022¹.

The Applicant is seeking to amend this requirement to extend the commencement period by a further two years, increasing the commencement period from five years to seven years. It is key to outline that the factors that remain unchanged include:

- the authorised development;
- the extent of development;
- the assessed construction activities, methods and phasing;
- operational activities;
- the maximum airport capacity;
- assessed aircraft movements;
- mitigation secured through the DCO; and
- commitments contained within the REAC remain unchanged.

¹ The Manston Airport Development Consent Order 2022, <https://nsip-documents.planninginspectorate.gov.uk/published-documents/TR020002-006370-220818%20Manston%20Airport%20Development%20Consent%20Order.pdf>

The proposed amendment under consideration here therefore relates to the period within which the authorised development may commence.

3. METHODOLOGY

The purpose of this appraisal is to determine whether extending the commencement period by two years could result in any new or materially different likely significant environmental effects when compared with those assessed within the ES and secured through the consented DCO.

The Applicant has applied professional judgement to identify the realistic mechanisms through which different environmental effects could arise and it is considered that the only realistic pathway through which new or materially different environmental effects could arise would be through changes in environmental baseline conditions over time.

The purpose of this appraisal is not to predict the precise environmental baseline that will exist at the end of the proposed extended commencement period. But rather consider whether any foreseeable changes in baseline conditions could reasonably occur during the additional two-year commencement period which could be of sufficient magnitude to materially alter the significance of effects identified within the ES.

Particular consideration has been given to traffic and transport, air quality and noise, as these are environmental topics most likely to be influenced by changes in baseline conditions over time however, the appraisal has considered all environmental topics addressed within the ES and relevant examination stage documentation, which are as follows:

- Air Quality;
- Traffic and Transport;
- Noise and Vibration;
- Biodiversity and Ecology;
- Water Resources and Flood Risk;
- Land Quality;
- Historic Environment and Archaeology;
- Landscape and Visual Effects;
- Socioeconomics;
- Health and Wellbeing;
- Climate Change;
- Major Accidents and Disasters; and
- Cumulative Effects.

The findings of the appraisal are provided in Table 3-1.

TABLE 3-1 ENVIRONMENTAL APPRAISAL

Environmental Topic	Comments on Relevant Area of ES	Conclusion
Planning Policy	The proposed amendment relates solely to the extension of the commencement period for the authorised development from by two years. No changes are proposed to the scale/ footprint, operational characteristics or mitigation associated with the authorised development. Whilst planning and environmental policy has continued to change and evolve on areas since the DCO was granted, these changes do not alter the characteristics of the authorised development or create a new environmental impact pathway.	The proposed time extension has no bearing on construction, operation or decommissioning activities originally proposed or associated with the authorised development. Whilst planning and environmental policy has continued to evolve since the DCO was granted, these changes do not alter the characteristics of the authorised development nor create any new environmental impact pathway arising from the proposed extension. The conclusions of the ES therefore remain valid.
Traffic and Transport	The ES included detailed assessment of both construction and operational traffic effects together with associated mitigation measures secured through the DCO and REAC. The most potentially sensitive environmental topic which could be affected by a commencement delay is transport due to the possibility of changes in baseline traffic conditions. The proposed amendment does not alter the authorised development, construction programme, operational characteristics, airport capacity or associated traffic generation. Whilst traffic conditions will continue to evolve during the additional two-year commencement period, Department for Transport National Road Traffic Projections indicate that background traffic is forecast to increase by approximately 22% between 2025 and 2060 under the Core Scenario². This equates to an annual growth rate of less than 0.7% per annum and a cumulative increase of approximately 1.2% over the additional two-year commencement period. On this basis, it is concluded that any reasonably foreseeable changes in baseline traffic conditions during the additional two-year commencement period would not be of sufficient	The proposed amendment would not alter the volume, nature or distribution of development-related traffic previously assessed. Having regard to forecast background traffic growth over the additional two-year commencement period, any reasonably foreseeable changes in baseline traffic conditions would be unlikely to materially alter the significance of effects identified within the ES. No new or materially different likely significant effects are anticipated and the conclusions of the ES remain valid.

² National Road Traffic Projections 2022, Section 1.11, Available at: <https://assets.publishing.service.gov.uk/media/6698c4f90808eaf43b50d193/national-road-traffic-projections-2022.pdf>

Environmental Topic	Comments on Relevant Area of ES	Conclusion
	magnitude to materially alter the transport conclusions reached within the ES. Furthermore, the authorised development, associated traffic generation and secured mitigation measures remain unchanged. The Construction Traffic Management Plan, Travel Plan, Airport Surface Access Strategy and other transport controls secured through the DCO and REAC would continue to apply and therefore the overall effect from a traffic and transport perspective would not change.	
Noise and Vibration	The ES assessed construction noise, operational airport noise, road traffic noise and associated community effects. Significant operational aircraft noise effects were identified and assessed as part of the consented development and appropriate mitigation including the Noise Mitigation Plan was secured through the DCO. The proposed amendment would not alter airport operating limits, assessed aircraft movement assumptions, noise controls, operational restrictions or mitigation commitments. The only realistic mechanism through which different effects could arise would be through changes in background noise conditions associated with changes in traffic flows over time. As discussed under Transport, whilst baseline conditions will continue to evolve during the additional two-year commencement period, it is concluded that any reasonably foreseeable changes in baseline noise conditions would be unlikely to be of sufficient magnitude to materially alter the conclusions of the ES. Furthermore, the airport operating controls, movement limits, Noise Mitigation Plan and other mitigation secured through the DCO remain unchanged and continue to govern the operation of the airport. The proposed amendment does not alter operational activity assumptions, aircraft movement forecasts or mitigation measures and therefore does not give rise to any new or	The proposed amendment does not alter the operational characteristics of the airport or associated mitigation and commitments including the Noise Mitigation Plan. This is secured by Requirement 9 of the DCO which also secures specific noise conditions which must not be exceeded. Further work has been undertaken in relation to an Airspace Change Application which confirms that noise effects resulting from aviation will remain within the envelope assessed as part of the DCO. No new or materially different noise or vibration effects are anticipated as a result of other construction or operational activities. The conclusions of the ES therefore remain valid.

Environmental Topic	Comments on Relevant Area of ES	Conclusion
	materially different likely significant noise effects. The DCO would continue to secure movement limits, operating restrictions and implement the Noise Mitigation Plan.	
Air Quality	The ES concluded that air quality impacts associated with both airport operations and associated road traffic would not result in significant adverse effects following mitigation. The only realistic mechanism by which an additional two-year commencement period could result in different effects would be through changes in background air quality conditions and traffic flows. On the basis of professional judgement, any reasonable changes in baseline air quality conditions or traffic flows during the additional two-year commencement period would be unlikely to be of sufficient magnitude to materially alter the air quality conclusions of the ES. The REAC contains a range of operational air quality measures, including traffic management, anti-idling controls, air quality monitoring and operational efficiency measures. These commitments remain unchanged and would continue to apply irrespective of the timing of commencement.	Any reasonably foreseeable changes in baseline air quality conditions during the additional two-year commencement period would be unlikely to materially alter the conclusions of the ES. No new or materially different likely significant air quality effects are anticipated and the ES conclusions remain valid.
Biodiversity and Ecology	The ES assessed effects on designated sites, habitats, protected species and ecological networks. Ecological mitigation, compensation, monitoring and species protection commitments remain secured through the DCO and REAC, including habitat creation, habitat management, protected species controls, pre-construction surveys, licensing requirements and ongoing monitoring obligations. These measures would continue to apply irrespective of whether commencement occurs within five years or seven years and therefore no new ecological pathways are introduced by the proposed amendment. The proposed amendment would not alter the extent of habitat loss, compensation requirements, mitigation measures or the	The proposed amendment does not change the area affected by the proposed development and is not therefore expected to result in any materially different effects than those assessed in the ES and related documentation. A Biodiversity Mitigation and Habitat Creation Plan was secured through the DCO and additional mitigation beyond that identified at the time is not expected as a worst case scenario was assessed at that time. Confirmatory pre-construction surveys will be carried out and the final written details of on and offsite mitigation are submitted to and approved by the local planning authority in consultation with Natural England in line with Requirements 8 and 12 of the Development Consent Order.

Environmental Topic	Comments on Relevant Area of ES	Conclusion
	footprint of development. Commencement of development remains subject to relevant ecological surveys, licensing requirements and ecological controls secured through the DCO. Any species surveys required prior to construction would continue to be undertaken at the appropriate time prior to commencement of works. Given that the nature and extent of ecological impacts remain unchanged, no new pathway exists by which the proposed commencement extension could lead to materially different ecological effects.	No new or materially different likely significant ecological effects are anticipated and the conclusions of the ES remain valid.
Habitat Regulations Assessment (HRA)	An HRA, including Appropriate Assessment was undertaken as part of the determination of the DCO application. Natural England was consulted throughout the application, examination and redetermination process, and Statements of Common Ground were prepared between the Applicant and Natural England. Following consultation with Natural England and consideration of the HRA, the Secretary of State concluded that the authorised development would not adversely affect the integrity of any European site, either alone or in combination with other plans and projects. The HRA considered potential effects associated with aircraft noise and disturbance, air quality, drainage and ecological effects on designated European sites. The Applicant also committed to a precautionary financial contribution towards management measures at Pegwell Bay and remains committed to delivering that undertaking. The proposed amendment relates solely to the extension of the commencement period and would not alter the authorised development, airport capacity, assessed aircraft movements, noise controls, ecological mitigation, biodiversity commitments or any of the pathways and controls relied upon by the Secretary of State when reaching the HRA conclusions. The DCO Requirements and associated mitigation measures would remain fully applicable.	The proposed amendment would not introduce any new pathway for likely significant effects on any European sites or materially alter any pathway previously considered through the HRA. The mitigation, controls and commitments would remain unchanged and fully applicable. Accordingly, the basis for the Secretary of State's conclusion that the authorised development would not adversely affect the integrity of any European site remains unchanged, and an updated HRA is not required as a consequence of the proposed two-year extension to the commencement period.

Environmental Topic	Comments on Relevant Area of ES	Conclusion
	The Applicant further notes that Natural England responded to the consultation on the non-material change application on 31 July 2026, and confirmed that it had no objection to the two year extension.	
Water Environment and Flood Risk	The ES concluded that impacts on groundwater, surface water, drainage and flood risk would not be significant subject to implementation of embedded mitigation and management controls. The proposed amendment would not alter drainage infrastructure, attenuation systems, flood mitigation measures, groundwater protection measures, pollution prevention controls or operational water management arrangements secured through the DCO and REAC. The authorised development remains unchanged and therefore no new pathways for impacts on the water environment are introduced.	No new or materially different effects on surface water, groundwater or flood risk receptors are anticipated. The conclusions of the ES remain valid
Land Quality and Ground Conditions	The ES identified potential contamination and land quality risks associated with the former airport site and secured a range of mitigation measures and controls. The proposed amendment would not alter the nature of ground disturbance, contaminated land management measures, remediation approach or pollution prevention controls secured through the DCO and REAC. Baseline geology and hydrogeological conditions are not anticipated to change materially during the proposed two-year extension period.	No new or materially different likely significant effects are anticipated and the conclusions of the ES remain valid. Requirement 11 of the DCO ensures that any contamination including groundwater that was not previously identified in the environmental statement is properly addressed in consultation with the relevant authorities.
Historic Environment and Archaeology	The ES considered effects upon archaeology, heritage assets and their settings. The ES and REAC identified significant effects relating to historic landscape character and the setting of certain heritage assets. These effects form part of the consented environmental position. Mitigation secured through the DCO includes archaeological investigation, recording and heritage management controls. The proposed amendment would not alter the extent of ground disturbance or the mitigation measures already secured through the consent. No additional heritage receptors would be affected and no new impact pathways are introduced.	No new or materially different likely significant effects are anticipated.

Environmental Topic	Comments on Relevant Area of ES	Conclusion
Landscape and Visual Effects	The proposed amendment does not alter the layout, design, scale, appearance or operational characteristics of the authorised development. Consequently, there would be no change to the visual envelope or landscape effects previously assessed within the ES. Whilst development within the wider area may introduce or alter the distribution of visual receptors over time, the authorised development has already been granted development consent and any subsequent development proposals would have been assessed in the context of the consented airport development through their own planning process. The authorised development, visual envelope and secured landscape mitigation remain unchanged and therefore no materially different landscape and visual effects are anticipated. Landscape mitigation and planting commitments secured through the DCO would continue to apply.	No new or materially different likely significant landscape or visual effects are anticipated. The conclusions of the ES remain valid.
Socioeconomics and Health & Wellbeing	The ES concluded that the development would generate substantial socioeconomic benefits through employment and investment whilst health and wellbeing effects were principally linked to air quality, noise and traffic pathways. The proposed amendment would not alter employment forecasts, operational activity or the delivery of socio-economic benefits. Furthermore, as no material changes to air quality, noise or transport conclusions are anticipated, the health and wellbeing conclusions of the ES similarly remain unchanged.	No new or materially different likely significant socioeconomic or health and wellbeing effects are anticipated. The conclusions of the ES remain valid.
Climate Change	The proposed amendment would not alter the scale of development, airport operations, operational lifespan, emissions sources or mitigation measures assessed within the ES. Whilst climate policy has evolved since consent was granted, the proposed amendment does not alter any aspect of the authorised development that could result in new climate-related effects. Climate resilience, adaptation measures and	No new or materially different likely significant climate change effects are anticipated. The conclusions of the ES remain valid.

Environmental Topic	Comments on Relevant Area of ES	Conclusion
	environmental controls already secured through the DCO would continue to apply.	
Major Accidents and Disasters	The ES assessed major accident and disaster scenarios associated with construction and operation of the airport. The proposed amendment would not alter operational activities, hazardous installations, aviation activities, construction methodologies or emergency planning arrangements. Accordingly, no new accident pathways are introduced as a consequence of the proposed time extension.	No new or materially different likely significant effects are anticipated and the conclusions of the ES remain valid.
Cumulative Effects	The ES included an assessment of cumulative effects with other developments. Whilst additional development may have progressed within the wider area since the DCO was granted, the authorised development remains unchanged and any subsequently consented schemes would reasonably have been assessed against the presence of the consented airport development. The proposed amendment would not alter construction activities, airport throughput, traffic generation or operational effects.	No new or materially different likely significant cumulative effects are anticipated and the conclusions of the ES remain valid.

4. CONCLUSION

The environmental appraisal has considered whether extending the commencement period for the authorised development by two years could result in any new or materially different likely significant environmental effects when compared with the findings of the ES, and any mitigation secured through the DCO and REAC.

Whilst environmental baseline conditions will continue to evolve during the additional two-year commencement period, it is concluded that foreseeable changes in baseline conditions would be unlikely to be of sufficient magnitude to materially alter the conclusions previously reached within the ES. The environmental controls, management measures, monitoring requirements and mitigation commitments secured through the DCO and REAC would remain fully applicable.

The proposed amendment would therefore not give rise to any new or materially different likely significant environmental effects, and the conclusions of the ES would remain valid. No environmental factors have been identified through this appraisal which would indicate that the proposed amendment should be considered material.



ERM HAS OVER 140 OFFICES ACROSS THE FOLLOWING
COUNTRIES AND TERRITORIES WORLDWIDE

Argentina	Mexico
Australia	Mozambique
Belgium	Netherlands
Brazil	Panama
Brunei	Peru
Canada	Poland
Chile	Portugal
China	Romania
Colombia	Singapore
France	South Africa
Germany	South Korea
Guyana	Spain
Hong Kong	Switzerland
India	Taiwan
Indonesia	Thailand
Ireland	United Arab Emirates
Italy	United Kingdom
Japan	United States
Kenya	Vietnam
Malaysia	

ERM's London Office

2nd Floor, Exchequer Court
33 St Mary Axe
London
EC3A 8AA

T: +44 (0) 20 3206 5200

