

Manston Airport Local Impact Report

Assessment of Local Impacts on the Dover
District



Dover District Council

15th February 2019

Abbreviations

ATC	Air Traffic Control
CCC	Canterbury City Council
DCO	Development Consent Order
DDC	Dover District Council
ES	Environmental Statement
KCC	Kent County Council
LIR	Local Impact Report
MHCLG	Ministry of Housing, Communities and Local Government
NPPF	National Planning Policy Framework
NSIP	Nationally Significant Infrastructure Project
PINS	Planning Inspectorate
RSP	RiverOak Strategic Partners
SAC	Special Area of Conservation
SPA	Special Protection Area
SOCG	Statement of Common Ground
TDC	Thanet District Council

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1. Introduction

- 1.1. This Local Impact Report (LIR) has been prepared by Dover District Council (DDC) for the Planning Inspectorate (PINs) regarding RiverOak Strategic Partners' (RSP) ('the Applicant') application for Development Consent Order (DCO) in relation to the proposed reopening of Manston Airport.
- 1.2. DDC is an 'interested party' (as of 8 October 2018) under the Planning Act 2008 with respect to the project and a neighbouring authority in relation to the proposed works and has considered the purpose of LIRs as set out in Section 60(3) of the Planning Act 2008 (as amended), MHCLG's *Guidance for the examination of applications for development consent* and PINS Advice Note One, *Local Impact Reports*, in preparing this LIR. Therefore, this document sets out details of the likely impacts of the proposed development on the local authority's administrative area. PINS advises that local authorities should cover any topics they consider relevant to the impact of the proposed development and should be used to fully and robustly report their local knowledge and evidence on local issues. Additionally, as recommended by guidance, this LIR includes a statement of positive, neutral and negative local impacts however does not contain a balancing exercise between positives and negatives.
- 1.3. This LIR sets out the local impacts under the headings of the technical matters raised in the Council's Relevant Representation dated 8 October 2018 submitted to PINS.
- 1.4. This LIR has sought not to duplicate material covered in the draft Statement of Common Ground (SOCG) between DDC and RSP.

Site Description and Surroundings

- 1.5. Located within the administrative boundary of Thanet and in close proximity to the northern part of the DDC administrative area, the land uses that are in or adjacent to the Order limits comprises a combination of existing buildings, hardstanding and a runway associated with its former use as an operational airport, expanses of grassland, with some limited areas of scrub and/or landscaping.
- 1.6. The surrounding area is generally characterised by arable farmland interspersed with moderate density villages, small groups of residential properties and individual properties. To the north-east there is a transition from agricultural to a more urbanised landscape, with the towns of Margate and Ramsgate. To the south the character comprises extensive arable farmland towards the Ash Levels within the Dover District.
- 1.7. In the wider area beyond the Order limits there are several internationally important statutory nature conservation designations relevant to the Dover District administrative area. Namely, the Thanet Coast and Sandwich Bay Ramsar and Special Protection Area (SPA); the Sandwich Bay Special Area of Conservation (SAC), the Sandwich Bay and Pegwell Bay National Nature Reserves and the

Sandwich Bay and Hacklinge Marshes Special Site of Scientific Interest, part of which falls within Sandwich Bay SAC, SPA and Ramsar.

1.8. There are no national landscape designations within the Order limits or in the immediate vicinity. The nearest such designation is the Kent Downs Area of Outstanding Natural Beauty which is approximately over 15km south west of the Order limits.

1.9. The Council concurs with the description of the site and its surroundings as set out in the Applicant's Environmental Statement (ES) [APP-032/5.1].

Summary of the Proposed Development

1.7. RSP has submitted an application to the Secretary of State for a DCO for the reopening and development of Manston Airport into a dedicated air freight facility (handling in excess of 10,000 air freight movements per annum), along with potential passenger, executive travel and aircraft engineering services.

1.8. The proposed development comprises the following principal components:

- Upgrade of runways 10/28 to allow CAT II/III operations;
- Re-alignment of parallel taxiway (Alpha) to provide European Aviation Safety Agency compliant clearances for runway operations;
- Construction of 19 European Aviation Safety Agency compliant Code E stands for air freight aircraft with markings capable of handling Code D and F aircraft in different configurations;
- Installation of new high mast lighting for aprons and stands;
- Construction of 65,000sqm of cargo facilities, a new air traffic control tower, a new airport fuel farm, a new airport rescue and firefighting service station and new maintenance/recycling hangars;
- Complete fit-out of airfield navigational aids;
- Demolition of the Northern Grass area for airport related businesses and of the redundant 'old' air traffic control tower;
- Safeguarding of existing facilities for museums on the site;
- Highways improvement work; and
- Extension of passenger service facilities including an apron extension to accommodate an additional aircraft stand and increasing the current terminal size.

1.9. This LIR does not describe the proposed development any further, relying on the Applicant's description as set out in Volume 1 Chapter 3 of the ES [APP-033/5.2-1].

Relevant Development Proposals

1.10. A description of development proposals relevant to the application Order limits is detailed in the Applicant's Planning Statement [APP-080/7.2]. The most recent include the following applications that have been submitted to Thanet District Council (TDC) for determination:

- **OL/TH/16/0550** - Comprehensive redevelopment of the site involving the demolition of existing buildings and structures and removal of hard standing and associated infrastructure, and provision of mixed use development. Application submitted in hybrid form (part-outline and part-detailed). The outline element comprises an outline planning application (with all matters except Access reserved for future determination) for the provision of buildings/floorspace for the following uses; Employment (Use Classes B1a-c/B2/B8), Residential (Use Classes C3/C2), Retail (Use Classes A1-A5), Education and other non-residential institutions (Use Class D1), Sport and Recreation (Use Class D2), Hotel (Use Class C1), Open space/landscaping (including outdoor sport/recreation facilities), Car Parking, Infrastructure (including roads and utilities), Site preparation and other associated works. The full/detailed element of the application comprises; change of use of retained existing buildings, Development of Phase 1 comprising four industrial units (Use Class B1c/B2/B8) with ancillary car parking and associated infrastructure, Access; and,
- **OT/TH/18/0660** - Comprehensive redevelopment of the site involving the demolition of existing buildings and structures and removal of hard standing and associated infrastructure, and provision of mixed use development. Application submitted in hybrid form (part-outline and part-detailed). The outline element comprises an outline planning application (with all matters except Access reserved for future determination) for the provision of buildings/floorspace for the following uses; Employment (Use Classes B1a-c/B2/B8), Residential (Use Classes C3/C2), Retail (Use Classes A1-A5), Aviation (Sui Generis), Education and other non-residential institutions including museums (Use Class D1), Sport and Recreation (Use Class D2), Hotel (Use Class C1), Open space/landscaping (including outdoor sport/recreation facilities), Car Parking, Infrastructure (including roads and utilities), Site preparation and other associated works. The full/detailed element of the application comprises; change of use of retained existing buildings, and means of access.

2. Application Process – Nationally Significant Infrastructure Project

- 2.1. The project was accepted as a Nationally Significant Infrastructure Project (NSIP), as defined by the Planning Act 2008 by PINS on behalf of the Secretary of State on 14 August 2018.
- 2.2. RSP submitted an application under section 37 of the Planning Act to PINS for an order granting development consent for the re-opening and development of Manston Airport to the Planning Inspectorate on 17 July 2018.
- 2.3. PINS is responsible for operating the planning process for NSIPs and as an Examining Authority, will examine the application and make a recommendation to the Secretary of State. The Secretary of State will then determine whether the application is in accordance with any relevant national policy statement unless, among other matters, whether the adverse impact of the proposed development would outweigh its benefits.

Assessment of the NSIP

- 2.4. With regard to assessing the NSIP, this must be in accordance with the decision-making framework as set out in the Planning Act 2008, relevant national policy statements for major infrastructure, as well as any other matters that are considered both important and relevant (e.g. National Planning Policy Forum 2018 and Department for Transport's Aviation Policy Framework 2013). National policy statements form part of the overall framework of national planning policy, and are a material consideration in determining planning applications.
- 2.5. In this case, the relevant national policy statement is the Airports National Policy Statement: New Runway Capacity and Infrastructure at Airports in the South East of England (June 2018).

3. Engagement Process

Pre-application Engagement

- 3.1. The Council has engaged with RSP formally as part of the pre-application consultation process during 2017 submitting responses in relation to the Preliminary Environmental Information Report and Statement of Community Consultation. In addition, the Council undertook pre-application engagement with RSP on the preparation of the Construction and Environmental Management Plan [APP-011/2.6] in 2018.
- 3.2. Furthermore, RSP engaged with local Councillors by providing a presentation, setting out an overview of the project, anticipated timescales and engagement strategy, as well as a Q&A session, at a Full Council meeting dated 23 July 2013. Alongside this, a number of engagement events were undertaken across the wider East Kent area.
- 3.3. The Council, TDC and CCC have finalised and signed a Planning Performance Agreement with RSP to ensure effective joint working and optimal outputs throughout the DCO process.

Statement of Common Ground

- 3.4. The extent of agreement reached between the Council and RSP on the impacts of the proposed development on the Dover District is set out in the SOCG. An initial draft SOCG is to be submitted on the same day as this LIR.
- 3.5. The Council has sought to constructively identify where further information and proposals are required, to ensure that the local impact of the re-opening and development of Manston Airport are adequately considered and mitigated, where necessary. The Council will continue to actively engage with RSP on the matters raised in the SOCG as the examination process advances.

4. Policy Context

National Planning Policy Framework/Planning Practice Guidance

- 4.1. The NPPF is the Government's planning policies for England and sets out how these are expected to be applied. The weight of the NPPF relating to NSIPs is clarified in paragraph 5 of the NPPF:

"The Framework does not contain specific policies for nationally significant infrastructure projects. These are determined in accordance with the decision making framework in the Planning Act 2008 (as amended) and relevant national policy statements for major infrastructure, as well as any other matters that are relevant (which may include the National Planning Policy Framework). National policy statements form part of the overall framework of national planning policy, and may be a material consideration in preparing plans and making decisions on planning applications".

- 4.2. Although the NPPF does not include specific policies for NSIPs, it states that local planning authorities should work with other authorities and providers should take account of the need for strategic infrastructure, including nationally significant infrastructure within their administrative areas. The NPPF is therefore a relevant consideration in decision making for NSIPs. The Government's National Planning Practice Guidance supplements the NPPF and must also be taken into consideration.

Statutory Development Plan

- 4.3. Section 38 (3)(b) of the Planning and Compulsory Purchase Act 2004 (as amended) describes the Development Plan as the development plan documents which have been adopted or approved in relation to the local planning authority area.
- 4.4. The Development Plan for the Dover District comprises the following: Adopted Core Strategy (2010), Land Allocations Local Plan (2015), Local Plan Saved Policies (2002), Kent Minerals and Waste Local Plan 2013-2030 (2016).

5. Assessment of Local Impacts of the Proposed Development

- 5.1. The following sections identify the impacts of the proposed development on the DDC administrative area and are listed in the order as set out in the Council's Relevant Representation dated 8 October 2018:

Economy

- 5.2. The Applicant's ES [APP-033/5.2-1] identifies that the proposed development is forecast to generate 2,655 jobs and 30,000 jobs by years 2 and 20 respectively. The Council concurs with the Applicant's assessment from a socio-economic perspective, with reference to its overall conclusions.

- 5.3. The Council recognises the potential positive benefits of the proposed development for the local economy and wider East Kent economy. Further clarification was sought regarding the scope of work anticipated to ensure that such economic benefits can be realised and since the commencement of the examination process, the Council, along with a range of stakeholders including education providers, have been actively involved in preparing a S106 agreement regarding education, training, local recruitment and procurement. Additionally, the Council intends to become a member of a Local Employment Partnership Board to address socio-economic matters with the presence of an operational Manston Airport.

Traffic and Transportation

- 5.4. The Council relies on the expertise of KCC – as Local Highways Authority – in assessing and evaluating the impacts of the proposed development on the strategic highway network and the identification of any associated mitigation measures, where necessary.

Landscape and Visual Impact

- 5.5. The Applicant's Landscape and Visual Impact Assessment, as set out in the ES [APP-034/5.2-2] encompasses viewpoints within 5km of the Order limits boundary, three of which fall within the DDC administrative area. The northern DDC area (namely, the Ash Levels Landscape Character Area) falls within the Zone of Theoretical Visibility established in the application.
- 5.6. As detailed in its Relevant Representation dated 1st October 2018 and the initial draft SOCG, the Council notes that the proposed height of new structures (e.g. Air Traffic Control (ATC) facilities, cargo facilities and aircraft recycling hangars) range between 20m and 27m.
- 5.7. The proposed development would result in a visual impact and change in landscape however with regard to the impact from receptors located within the Dover District, further information is required, as detailed in the initial draft SOCG between DDC and RSP submitted at Deadline 3.

Noise and Vibration

- 5.8. RSP has provided an assessment of the potential noise and vibration effects that could arise as a result of proposed development. This is detailed in the ES [APP-034/5.2-2]. The Council raised noise related matters in its Relevant Representation dated 8th October 2018. Further detail on such matters is set out in the draft SOCG between DDC and the Applicant submitted at Deadline 3.
- 5.9. In conjunction with TDC and CCC, DDC has appointed Ricardo, an independent noise consultant, to review the assessment. In respect of the DDC administrative area, Ricardo has raised the following matters:
- It is noted that no properties within the DDC area are predicted to be eligible for noise insulation;

- For communities identified for DDC in the ES [APP/5.2.-2], noise levels will be below the LOAEL LAeq, 16hr and LAeq, 8hr levels presented. The Council concurs with this approach which agrees with national policy when determining likely significant effects of aircraft noise and conforms to current UK airspace policy and the Airports National Policy Statement: New Runway Capacity and Infrastructure Airports in the South East of England; and
- Subject to the determination of the DCO, any new or refurbished developments should show that they have considered noise exposure from an operating Manston Airport to ensure that there are no adverse effects arising from aircraft noise. Consideration should be given to the Association of Noise Consultants document, Professional Practice Guidance on Planning and Noise (ProPG) for good acoustic design of residential developments.

Biodiversity

- 5.10. DDC relies on the expertise of KCC and Natural England in assessing the likely ecological impacts of the proposed development on environmentally designated sites within the district and identifying any necessary mitigation measures.

Heritage

- 5.11. DDC relies on the expertise of KCC Heritage Conservation and Historic England in assessing the potential impact of the proposed development on the historic environment.

6. Conclusion

The Council has reviewed the application and evaluated the potential impacts of the proposed development on the Dover District administrative area. Overall, the Council recognises the potential positive socio-economic benefits of the proposed development for the East Kent area and looks forward to continue to proactively engage with the Applicant in realising such benefits through use of the appropriate mechanisms. Additionally, the Council agrees with the noise levels presented by the Applicant for communities identified across the Dover District and stipulates that consideration is given to noise exposure from an operating Manston Airport for any new or refurbished developments within the administrative area.