



RiverOak Strategic Partners

Draft (not agreed) Statement of Common Ground between the Applicant and Cogent Land LLP

TR020002/D4/SOCG/CL

Examination Document

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| Project Name: | Manston Airport Development Consent Order |
| Application Ref: | TR020002 |
| Submission Deadline: | 4 |
| Date: | 8 March 2019 |

MANSTON AIRPORT DCO [201X]

Planning Inspectorate Reference: TR020002

Statement of Common Ground

Between

RIVEROAK STRATEGIC PARTNERS LIMITED

and

COGENT LAND LLP

| Document control | | | |
|---------------------|---------|--------|--|
| Document properties | | | |
| Parties | | | RiverOak Strategic Partners Limited and Cogent Land LLP |
| Author | | | Andrew Lister |
| Approved by | | | |
| Title | | | Draft Statement of common ground between RiverOak Strategic Partners Limited and Cogent Land LLP |
| Document reference | | | |
| Version history | | | |
| Date | Version | Status | Description/changes |
| 08/02/19 | V1 | Draft | First draft |
| 15/02/19 | V2 | Draft | Comments from Penningtons Manches |
| 21/02/19 | V3 | Draft | Updated version sent to Penningtons Manches |

TABLE OF CONTENTS

| | | |
|---|--|---|
| 1 | Introduction and Purpose | 4 |
| 2 | Consultation with Cogent Land LLP | 6 |
| 3 | Matters which are fully agreed between the parties | 6 |
| 4 | Matters agreed in principle between the parties | 7 |
| 5 | Matters not yet agreed between the parties | 7 |

1 Introduction and Purpose

1.1 Purpose of Statement of Common Ground

- 1.1.1 This Statement of Common Ground (“SoCG”) relates to an application to be made by RiverOak Strategic Partners Limited (“RiverOak”) to the Planning Inspectorate under sections 14 and 35(2)(ii) of the Planning Act 2008 (“Act”).
- 1.1.2 The application is for an order granting development consent (“DCO”). The draft DCO is referred to as the Manston Airport DCO. The Manston Airport DCO, if granted, would authorise RiverOak to re-open and operate an airport on the site of the former Manston airport in the district of Thanet in Kent and associated development (“Development”).
- 1.1.3 RiverOak submitted a DCO application to the Planning Inspectorate on the 17 July 2018 and it was accepted for examination by Planning Inspectorate on the 14 August 2018. In the Rule 8 letter dated 18 January 2019, the Examining Authority requested that RiverOak and Cogent Land LLP (“Cogent Land”) prepare an SoCG to deal with the “possible effects and possible mitigation in relation to the permitted development at Manston Green (described in Table 18.5 of the Environmental Statement Volume 3 Chapters 17 to 18 [APP-035]).”.
- 1.1.4 This SoCG has been prepared by RiverOak and Cogent Land LLP in respect of the Development.
- 1.1.5 The purpose and possible content of SoCGs is set out in paragraphs 58-65 of the Department for Communities and Local Government’s guidance entitled “*Planning Act 2008: examination of applications for development consent*” (26 March 2015). Paragraph 58 of that guidance explains the basic function of SoCGs:
- “A statement of common ground is a written statement prepared jointly by the applicant and another party or parties, setting out any matters on which they agree. As well as identifying matters which are not in real dispute, it is also useful if a statement identifies those areas where agreement has not been reached. The statement should include references to show where those matters are dealt with in the written representations or other documentary evidence.”*
- 1.1.6 SoCGs are therefore a useful and established means of ensuring that the evidence at the DCO examination focuses on the material differences between the main parties, and so aim to help facilitate a more efficient examination process.
- 1.1.7 The purpose of the SoCG is to set out agreed factual information about the proposed DCO application by RiverOak. It is intended that the SoCG should provide matters on which RiverOak and Cogent Land agree as well as identifying areas where agreement has not been reached.
- 1.1.8 RiverOak and Cogent Land are collectively referred to in this SoCG as ‘the parties’. The parties have been, and continue to be, in direct communication in respect of the Development.

- 1.1.9 It is envisaged that this SoCG will evolve during the examination phase of the DCO application.
- 1.1.10 Subsequent drafts will be agreed and issued, with the version numbers clearly recorded in the 'Document Control' table at the beginning of the document.

1.2 The role of Cogent Land and the DCO application

- 1.2.1 Cogent Land is a limited liability partnership, with outline planning permission (ref. OL/TH/14/0050) (the "Permission") for the erection of 785 dwellings, highways infrastructure works, primary school, small scale retail unit, community hall, and public openspace on land East and West of Haine Road, Ramsgate (the "Manston Green Development"). This site is located approximately 1km to the Development site. Cogent Land is also recorded in the Book of Reference as a Category 2 interest having an option over parcels 60-67 (the eastern landing lights area).

1.3 The Development location and description

- 1.3.1 The Development site lies adjacent to the village of Manston, approximately 13 miles north-east of Canterbury and one mile north-west of Ramsgate. It is on the former site of Manston Kent International Airport which closed on 15 May 2014 and is within Thanet District Council and Kent County Council boundaries.
- 1.3.2 The Development site comprises approximately 732 acres of land. The area in which the proposed Development would be located comprises land to the south and north of Manston Road.
- 1.3.3 The proposed Development comprises the 'principal development' - which includes all works to provide an integrated aviation services hub with the main feature being a major international centre for air freight that is capable of handling a minimum of 10,000 air freight Air Traffic Movements per year and 'associated development', comprising other development that has a direct relationship with the principal development and is required to support its construction and/or operation.
- 1.3.1 The Proposed Development comprises:
- (a) upgrade of Runways 10/28 to allow CAT II/III operations;
 - (b) re-alignment of the parallel taxiway (Alpha) to provide European Aviation Safety Agency (EASA) compliant clearances for runway operations;
 - (c) construction of 19 EASA compliant Code E stands for air freight aircraft with markings capable of handling Code D and F aircraft in different configurations;
 - (d) installation of new high mast lighting for aprons and stands;
 - (e) construction of 65,500m² of cargo facilities;
 - (f) construction of a new air traffic control (ATC) tower;
 - (g) construction of a new airport fuel farm;

- (h) construction of a new airport rescue and firefighting service station;
- (i) complete fit-out of airfield navigational aids (nav-aids);
- (j) construction of new aircraft maintenance / recycling hangars;
- (k) development of the Northern Grass area for airport related businesses;
- (l) demolition of the redundant 'old' ATC Tower;
- (m) safeguarding of existing facilities for museums on the site;
- (n) highway improvement works; and
- (o) extension of passenger service facilities including an apron extension to accommodate an additional aircraft stand and increasing the current terminal size.

1.4 Further details of the development can be found in Chapter 3 of the Environmental Statement which accompanies the DCO application (**Document 5.2-1**).

2 Consultation with Cogent Land LLP

- 2.1 Cogent Land LLP responded to public consultation on the 21 July 2017 (copy attached at Appendix 1) in respect of the withdrawn DCO application. Cogent Land LLP will provide an update to that consultation which will consider the differences between the Development as it was when the July 2017 response was prepared and that subject to the DCO.
- 2.2 Discussions regarding the SoCG began on 1 February 2019 following publication of the Rule 8 letter by the ExA on 18 January 2019.
- 2.3 Cogent Land LLP have also made representations to the Thanet Local Plan consultation in respect of other land that could be affected by the Development, these are

3 Matters which are fully agreed between the parties

- 3.1 Subject to the provision of measures as set in parts 3 and 5 of this statement Cogent Land LLP do not object to the Development in principle.
- 3.2 A condition of the Permission for the Manston Green Development is that the construction of phases 1a, 1b, 1a, 3a and 3b shall not commence until a scheme for protecting the development which falls within these phases from aircraft noise has been submitted to, and approved in writing by, the Local Planning Authority (Condition 35).
- 3.3 Condition 36 of the Permission requires that no dwellings shall be constructed within the part of the Manston Green Development that falls within Noise Category C as set out within the Thanet Local Plan 2006.
- 3.4 The Manston Green Development was considered on the basis that the airport would be operational however; the parameters of that operational capacity and extent of further works to the airport were materially different to that subject to the DCO. Appendix 2 shows the 57dB

and 63dB daytime contours used by the Manston Green permission and the 50dB and 63dB daytime Year 20 contours assessed in the Environmental Statement for RiverOak's project.

4 Matters agreed in principle between the parties

5 NoneMatters not yet agreed between the parties

- 5.1 The extent of, and who would pay for, mitigation measures that will satisfy Thanet District Council in discharging Condition 35.
- 5.2 The extent of, and who would pay for, mitigation measures that will satisfy any requirements for noise mitigation as a result of the Development for future development of land within the control of Cogent Land LLP.
- 5.3 The extent of, and who would pay for, any measures required to mitigate the effects described in Table 18.5 of the Environmental Statement Volume 3 Chapters 17 to 18 [APP-035].

Signed on Behalf of RIVEROAK STRATEGIC PARTNERS LIMITED

Signature:

Name:

Position:

Date:

Signed on Behalf of COGENT LAND LLP

Signature:

Name:

Position:

Date:

Appendix 1

July 2017 Representation



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21st July 2017

LS – 07/085
BY EMAIL

Dear Sir/Madam,

MANSTON AIRPORT 2017 CONSULTATION REPRESENTATIONS

These representations have been prepared by Icen Projects on behalf of Cogent Land LLP (CL) and are submitted in response to the Manston Airport 2017 Consultation Overview Report.

a. Background

By way of background, CL were granted outline planning permission, including details of the access, on 13th July 2016, for the erection of 785 dwellings, highways infrastructure works (including single carriageway link road), primary school, small scale retail unit, community hall and public open space on the land to the east and west of Haine Road (Manston Green) (LPA ref: OL/TH/14/0050). This Manston Green site is located approximately 1km to the east of Manston Airport runway. A copy of the site location plan and approved masterplan for the Manston Green development is attached as Appendix 1.

Given the location of the Manston Green site, CL have a particular interest in the proposals to reopen and expand Manston Airport.

CL agree that Manston Airport was a valuable regional and national asset, rich in history and understand that an established and vibrant airport would help to rejuvenate the wider area.

In addition to creating a number of jobs relating to the airport, the proposal would also help to boost the region's GDP through increased income from a wide variety of sources including tourism and inward investment by businesses. It is noteworthy that all these benefits would increase the need for additional houses to be provided in the local area.

Whilst CL are not against the principle of re-opening the airport, these representations consider RiverOak Strategic Partners proposal as set out in the consultation report and the impact it may have on the extant planning permission at Manston Green, and future development likely to be required.

CL are conscious that any proposal to develop the airport must have due regard to the extant planning permission and are concerned to safeguard the development plans at Manston Green. The expansion plans must also take into consideration future housing development which is required to meet Thanet's growing population and on-going housing need.

Over the Plan period (up to 2031), Thanet District has an objectively assessed housing need of 17,140 dwellings which is required to meet the need of Thanet's growing population.

These representations make specific reference to the key considerations that need to be reviewed and taken into account before any plans to re-open and expand the airport can realistically come forward.

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RiverOak Strategic Partners Proposal

The consultation document explains that Manston Airport is a unique and important strategic transport asset in the UK, which is currently unused. RiverOak Strategic Partners is proposing to reopen Manston Airport as an international air freight hub to allow the airport to fulfil its economic potential, and in doing so, become a vibrant catalyst for economic growth not only in the south east but also in the UK.

RiverOak Strategic Partners plans to redevelop and reopen Manston as a mixed-use airport are anchored by a significant and much-needed air freight hub able to handle at least 10,000 air freight movements a year.

To achieve this, RiverOak Strategic Partners is proposing a multimillion-pound, four-phase construction and redevelopment plan, which will be delivered across an estimated 15 years.

The proposals include both the use of the existing airport infrastructure and the introduction of new facilities. In summary the proposal would include:

- Upgrading the runway and improving the Alpha parallel taxiway;
- Constructing 19 new air cargo stands;
- Completely re-fitting the airfield navigation aids;
- Refurbishing or replacing the existing fire station and constructing a new fire training area;
- Building new air cargo facilities;
- Developing a new air traffic control service, demolishing the current Air Traffic Control tower;
- Building new aircraft maintenance hangars and developing areas of the 'Northern Grass' for airport related business; and
- Highway improvement works to ensure improved access to and around Manston Airport, including a new, permanent, dedicated airport access on Spitfire Way which will help to reduce airport related traffic on the local road network.

b. Key Considerations

As explained above, CL do not object in principle to the reopening and expansion of Manston airport for the uses described by the promoter. However, before such plans can be progressed, there are a number of key considerations which must be taken into account.

Housing

The Local Plan Proposed Revision to draft Local Plan (preferred options) published January 2017, stipulates that in combination with the Preferred Options Local Plan published in 2015, the Council is seeking to make full provision for the housing requirement of 17,140 dwellings for the Plan period to 2031.

Despite the Council's commitment to meet the objectively assessed housing target of 17,140 dwellings over the plan period, it has been determined that the Council does not currently have a 5 year housing land supply of deliverable housing sites as required by paragraph 49 of the NPPF.

Thanet District Council are therefore in a position where additional sites will need to come forward for the delivery of housing to help address the district housing shortfall. Given the lack of brownfield land in the region, there will be a need to develop some homes to meet this need on sustainable and suitable greenfield land.

Given the housing shortfall within the Thanet District, it is imperative that the planning permission for 785 dwellings on the Manston Green is implemented and the authorised development delivered. Any proposed expansion of Manston Airport must therefore be sympathetic and give respectful consideration to the development plans for this site.

It is also important that future housing development in this area is not hindered in any way by the proposed airport expansion plans. A strategy must therefore be put in place that ensures the interest of future development sites for housing are reliably protected.

Transport

A review of the transport section (Chapter 14) of the Preliminary Environmental Information Report Volume 3 July 2017, has been undertaken by Icen Projects Transport Consultants.

Given that the work undertaken by the promoter is at a preliminary stage, the report essentially sets out what will be undertaken as part of the proposed planning application. The key traffic and transport aspects of the proposal are set out as follows:

- Proposed development would support 17,000 air freight transport movements (equating to 350,000 tonnes of air freight per year);
- 10,000 passenger flight air transport movements (equating to 1.5 million passengers per year);
- 119,000sqm of business/industrial land use;
- 1,686 public car parking spaces plus 60 staff car parking spaces for the passenger area;
- 700 staff and visitor car parking spaces for the cargo area, plus 57 HGV parking spaces;
- New accesses from Spitfire Way and Manston Road, along with improvements to existing Manston Road access;
- Four construction phases (with completion dates of 2020, 2022, 2028 and 2033);
- Construction employees of between 85-100 at any one time;
- Approximate no. of employed staff of 4,300 (with up to 1,500 on site at any one time).

An assessment of the likely magnitude of impact towards the highway network has been undertaken and set out within the chapter in accordance with the standard industry criteria. This data takes into effect users of the roads and uses fronting the roads. The conclusion of the chapter is that there will be significant impacts on the following parts of the highway network (see table below), whilst other receptor locations are expected to experience a less than significant impact.

| Receptor | Construction | Opening | Maximum Operations |
|---|--------------|---------|--------------------|
| ID 6 – B2190 between A299 and Minister Road | Yes | No | Yes |
| ID 8 – B2050 Manston Road between Spitfire Way and Shottendane Road | No | No | Yes |
| ID 9 – Spitfire Way between Minster Road and Manston Road | Yes | Yes | Yes |
| ID 13 – Manston Road between Manston Court Road and A256 | No | Yes | Yes |
| ID 14 – Haine Road between Manston Road and Haine | No | No | Yes |

The consequence of the above is that further work and a need to determine a suitable package of mitigation measures will be required as part of the transport work supporting the planning application, as set out at section 14.17 of the report below:

14.17 Mitigation, next steps:

After this PEIR is submitted, the traffic generation, distribution and assignment will be verified and this, plus other assumptions will be discussed with KCC and HghE. Once a methodology and study area have been agreed where possible, the development of the Transport Assessment (TA) can commence. This assessment will consider all aspects of transportation including sustainable transport modes, access strategies and the suitability of the highway network to accommodate the construction traffic and operational traffic. The conclusion of the TA will include a package of mitigation measures that will minimise the effects on the transport network to an acceptable degree. Once the Transport Assessment is complete the ES chapter will be updated to incorporate these mitigation measures thereby reducing all effects to 'not significant'.

Having reviewed the details provided in regards to the proposed methodology for the supporting transport work which is to be undertaken, CL consider that the following matters need to be considered and assessed thoroughly before any proposed plans to expand the airport are taken further:

Clarification on Multi-Modal Split

An estimate of transport modal split for passengers has been outlined, which equates to 3% by bus and the remaining 97% by car travel (7% taxi, 45% cars parked and 45% car drop off). Whilst it is suggested that travel plan measures will aim to increase sustainable travel, there is some concern that car travel will remain as the predominant method of travel leading to a significant impact on the highway network within the surrounding area.

Clarification on Travel Patterns

In addition to the modal split, confirmation of travel patterns for passengers and employees would be required in order to identify the likely daily/weekly/annually profile for travel, so as to determine how these will impact on the highway network throughout different times and not just the 'normal' peaks.

Traffic Distribution

Details of traffic distribution for the proposed development have not been provided at this stage. A clear understanding as to whether the assignment of traffic has been based on existing traffic movements, NOMIS data or assumptions is imperative. Certain parts of the highway network are subject to congestion and constraints and therefore this is an important factor in capacity assessment across the surrounding area.

Committed Development/Transport Schemes

The report states *'The committed developments and committed transport schemes will be discussed with KCC and Highways England and an agreement will be reached outlining which developments/schemes to include in which future baselines.'* As a consequence, confirmation of which committed developments are being considered as well as any associated highway improvement schemes which may be relied upon to support the application is considered critical in determining the available capacity in the surrounding network.

With this in mind, the transport improvements made to the highway network as part of CL's Manston Green development plan or any other proposed future improvement for that matter, must be taken into consideration.

Noise and vibration

During the determination process of the Manston Green Planning Application (LPA ref: OL/TH/14/0050) a technical note was prepared and submitted setting out the noise implications of the potential growth of the Manston Airport to 2033 as shown in the 2009 Kent International Airport Masterplan (for your reference we enclose a copy of this submitted 'potential growth' note in Appendix 2). This masterplan for the airport was used as a 'worst case' scenario with the supporting note clearly setting out the levels and limits that the approved Manston Green scheme is mitigated against.

The original noise and vibration approach taken for the Manston Green scheme was set out in the Environmental Statement (ES) submitted in support of the application. A copy of this Noise ES chapter is enclosed as Appendix 3 of these representations.

This statement used the published 2010 daytime contours for the airport and a report on the proposed 'night flights' which Manston, at the time, were advancing.

The ES mitigation strategy included:

- Avoid development inside the 2010 57 dB LAeq daytime contour
- Intermediate weight acoustic glazing to bedrooms where necessary

As part of the Manston Green application, CL were asked by the Council to consider the Masterplan proposals for 2018 and 2033, which was set out in the 'Potential Growth' note. Members were concerned about CL's proposed development of the Manston Green site restricting future operations at Manston airport.

The 'Potential Growth' note sets out what was then an aspirational annual target level of 46,000 movements by 2018 and 74,000 movements by 2033. As no noise contours for 2033 were available, the 2033 aspirations to daytime noise levels figures were estimated by factoring up from the 2018 contours. The Council were satisfied with this approach and concluded that the proposed Manston Green development could be robustly designed.

The Manston Green airport consultation documents currently contain no information on noise (which is a significant omission), and certainly no noise contours against which to judge impacts, so any worsening of the base position set out in the 'Potential Growth' note will need to be addressed by the noise assessment for the proposals, whereby it was concluded that:

- No residential development would be within the 57 dB LAeq daytime contour for the 2018 aspirational target;
- Residential development was unlikely to be within the 63 dB LAeq daytime contour for the 2033 aspirational target; and
- The proposed mitigation strategy set out in the ES would effectively address those levels

Of the 27,000 movements currently proposed, 17,000 are proposed to be freight movements. Freight movements are more likely to be at night, so night time noise levels will need to be addressed. This goes back to the ES chapter (Appendix 3), where we set out our approach as follows.

- Avoid development within the LAeq,8Hr 57 dB contour;
- Avoid development within the 95 dBA SEL contour (where possible); and
- Provide additional mitigation (glazing and construction methods) where development within the 95 dBA SEL contour is unavoidable

The above data was based on the night flight proposal which was in existence at the time (but not permitted). Any worsening of this in the context of the masterplan will need to be addressed by the proposed development, principally the 3rd bullet point above – the potential need for mitigation for properties exposed to 95 dBA SEL at night – this is an individual overflight noise level which is used to determine the likelihood of sleep disturbance at night, as opposed to the "average" levels used during the day. The basis of CL's proposed package of mitigation measures (which the airport's noise consultant was in agreement with at the time) was that the night exposure would only occur twice per week and that the "critical limit" for the 95 dBA SEL was 6 times per night. These principles must be addressed as part of the noise assessment for the proposals.

Having assumed the closure of the airport in the long term, CL's Manston Green scheme has been designed around a certain noise level, with the expectation that there would be no significant noise disturbance and no need therefore for specific noise attenuation/mitigation measures to be designed in. It's anticipated that such measures will be required if the airport expansion proposals proceed and the associated costs of these measures will have a material impact on scheme viability.

Other Matters

Air Quality

Chapters 1-6 of the Preliminary Environmental Information Report (Volume 1) addresses Air Quality and states that 'Thanet generally has good air quality; however there are areas where air quality is poor due to pollution from road transport. The boundary of the proposed airport expansion abuts the boundary of the Thanet Urban Air Quality Management Area (AQMA), which encompasses areas of Thanet where levels of nitrogen dioxide are above the national air quality objective for the protection of human health. In all cases, the main source of pollution is road transport.'

The report confirms that a desktop study into the current concentration of air pollutants has been undertaken to inform the preliminary air quality assessment. The study suggested that the potential effects that may arise as a result of the Manston Airport proposal are:

- Dust generated during construction phase;
- Dust soiling of the local road network due to the transport of dust and dirt from vehicles leaving the site during the construction phase;
- Emissions from the use of equipment and machinery on-site during construction;
- Vehicle emissions during both construction and operation;
- Emissions from aircraft movements on the ground and during the land and take-off cycle, and
- Emission from aircraft ground support equipment.

Given the potential air quality effects that may arise as part of the proposed reopening of the airport, CL request that the proposed airport expansion ensures that adequate monitoring on the effects of air quality is undertaken and secured and that controls are put in place to ensure that the forecast emission levels do not exceed the acceptable level.

Biodiversity

Chapter 7 of the Preliminary Environmental Information Report (Volume 2) provides an overview of the existing biodiversity baseline.

With this in mind, CL request that sufficient monitoring on the effects of biodiversity on the surrounding area is undertaken and secured in order to ensure that no negative impacts arise from the proposed re-opening of the airport.

c. Summary

Despite their in principle support for the reopening of the airport, CL stress that any proposed development of the airport must respect and have due regard to the extant planning permission for the development of 785 dwellings, highways, infrastructure works (including single carriageway link road), primary school, small scale retail unit, community hall and public open space on the land to the east and west of Haine Road (Manston Green).

The proposed expansion plans of the airport must also take into consideration the future housing development required to meet Thanet District Council's objectively assessed housing need. Revised Policy SP11 of the 'Proposed Revisions to Draft Local Plan' (Preferred Options)(2017) sets out that the Council have a requirement to deliver 17,140 additional homes over the plan period which runs to 2031, and land in proximity to the airport will be required in order to achieve this.

Despite the Council saying they are committed to meeting this target, it has been confirmed that the Council does not have a robust five year housing land supply. Given the housing shortfall across the district, Thanet District Council are in a position where additional sustainable Greenfield housing sites will need to come forward and be delivered in the short to long term. With this in mind, the delivery of Manston Green, which has planning permission for 785 dwellings, is vital for the district.

Having reviewed the technical information provided within the RiverOak Strategic Partners Manston Airport 2017 Consultation Report, CL consider that there are a number of technical details which remain to be addressed before the proposed plans to reopen the airport can be progressed and an application for development consent submitted.

Two of the key considerations include the potential transport and highways impacts that may occur and the impact that potential noise mitigation may have on the development proposals for the Manston Green site and other future housing development proposals.

Other key considerations include reviewing the potential impact that may be caused by the proposal to reopen Manston Airport in regards to air quality and biodiversity. With this in mind, CL request that sufficient monitoring on the effects of air quality and biodiversity on the surrounding area are undertaken to ensure that no negative impacts arise from the proposed re-opening of the airport.

CL are also of the opinion that further time needs to be taken to complete the technical work required and that further consultation on the proposals should be undertaken once that work has been completed.

Under Section 49 of the Planning Act 2008, these representations must be considered as part of the Manston Airport 2017 Consultation process and we respectfully request that RiverOak Strategic Partners take this submission into account accordingly. We would also be grateful for confirmation that these representations have been received. Should you have any queries or require any additional details regarding any of the information raised above then please do not hesitate to contact me on 02034354227/iscarfe@iceniprojects.com.

As set out under Section 42 and 44 of the Planning Act 2008, CL require that they are kept involved in any future consultations regarding the proposal for reopening Manston Airport.

Yours faithfully,



Leo Scarfe MRTPI
Senior Planner
cc. Cogent Land LLP

Appendix 2

Local Plan Representations



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4th October 2018

Dear Sir/Madam,

Draft Local Plan (Regulation 19) Consultation – Land at Manston Green, Ramsgate

On behalf of our client, Cogent Land LLP (CL), IcenI Projects is writing in response to Thanet District Council's Draft Local Plan consultation exercise. This submission relates to the land known as Manston Green located to the east and west of Haine Road, Ramsgate (the 'Site').

In order to inform this submission, please also find enclosed a copy of the site location plan attached as appendix A1.

a. The Site

By way of background, CL were granted outline planning permission on the 'Site', including details of the access, on 13th July 2016, for the erection of 785 dwellings, highways infrastructure works (including single carriageway link road), primary school, small scale retail unit, community hall and public open space on the land to the east and west of Haine Road (Manston Green) (LPA ref: OL/TH/14/0050).

The 'Site', which is 46.83ha in size is located approximately 1km to the east of Manston Airport. A copy of the site location plan and approved masterplan for the Manston Green development is attached at Appendix A1 and A2 respectively.

In line with Conditions 1 and 2 of the planning consent a Reserved Matters Application, for Phase 1, is in the process of being prepared to confirm details relating to outstanding matters such as layout, scale, appearance of any buildings to be erected and landscaping. This Reserved Matters Application is to be submitted to Thanet District Council in advance of the outline planning consent expiration date on the 13th July 2019.

Under Policy SP13 (Strategic Housing Sites) of the Council's Draft Local Plan, the site has also been allocated as a 'site of strategic importance for delivering the quantity and type and variety of homes required to deliver the Council's preferred strategy'. The site has been included as a strategic housing site within the Draft Local Plan for up to 785 dwellings.

The land is allocated for up to 785 new dwellings at a maximum density of 35 dwellings per hectare net at land known as Manston Green (given that planning permission has been granted on site so this figure has not been included within the Draft Local Plan allocation calculation).

b. Draft Local Plan Housing Strategy

The Draft Thanet Local Plan - 2031 is prepared under the National Planning Policy Framework (NPPF) (2012), which sets out the principle to achieve "sustainable development", defined as "development that meets the need of the present without comprising the ability of future generations to meet their own needs".

In pursuing sustainable development, the Plan claims to positively seek opportunities to meet the needs of the area, and economic, social and environmental gains are sought jointly and simultaneously. Taking on board the requirements of the NPPF (Para 47), which aims to boost housing supply and expects Local Plans to meet the full objectively assessed needs (OAN) for market and affordable homes.

With this in mind, Policy SP11 of the Draft Local Plan sets out a total housing provision of 17,140 additional homes in the District over the course of the plan period to 2031:

| Period | 2011-16 | 2016-2021 | 2021-2026 | 2026-2031 | Total |
|------------------|---------------------------|-----------|-----------|-----------|-----------------|
| Additional Homes | 1,555 (already delivered) | 4,500 | 5,500 | 5,585 | 17,140 (857p/a) |

The housing requirement, as set out in the Draft Local Plan, is based on the 2017 SHMA, which took 2014-based household projections, and then applied an upward adjustment for migration from London and a modest upward adjustment to headship rates to generate an objectively-assessed need for 857 dwellings per annum.

The upward adjustments made from the initial demographic projections of 821 dpa to the OAN of 857 dpa represent an uplift of 4%. This is modest scale of uplift set against:

- A lower quartile house price to earnings ratio of 10.0 in 2017
- The deterioration of this ratio from 7.65 at the start of the plan period
- Adjustments made in Local Plan examinations in other areas. The lower quartile house price to earnings ratio in that area was 10.6, and the Inspector's at the Local Plan examination found that a 13% uplift for market signals was warranted.
- The Government's standard methodology for assessing housing need which would justify an uplift of 41% to the base household projections.

A more substantial uplift should be considered to contribute to achieving the Government's aim of improving affordability. If a market signals adjustment of 12% was applied to the latest household projection data, this would generate a need for 17,870 homes. CL consider that the housing requirement should be amended accordingly.

CL consider that the housing requirement should be increased to 17,870 homes and additional allocations brought forward to meet this increased need.

c. Further Allocation

CL would like to take this opportunity to express that by allowing a slightly higher density and incorporating all developable land included within CL's option agreement, outlined in red on the enclosed Site Location Plan (appendix A1), the 'Site' could accommodate an additional circa 150 units above that which has already been consented under Outline Planning Permission OL/TH/14/0050.

This could be achieved by restructuring the approved internal road infrastructure and realigning the A256 (Haine Road) so that it continues to run through the centre of the site, as shown on the enclosed plan (drawing number: 37-B) prepared by Icenl (Appendix A3).

The Outline Planning consent included a proposal to restructure part of Haine Road so that it bypassed Ozengall Farmhouse, located in the centre of the site, which originally fell outside CL option agreement. Since the grant of Outline Planning permission, conversations have been ongoing with the owners of Ozengall Farmhouse about the possibility of CL acquiring this parcel of land. Should such acquisition take place then the bypass road would no longer be required creating additional space to increase the density provided on site by an additional 150 dwellings.

A revised 'illustrative block' masterplan, prepared by Icenl and enclosed as Appendix A4 demonstrates how such development could come forward. Bearing this revised masterplan in mind, it is proposed that within the Council's emerging Local Plan, the Land at Manston Green should be allocated for a total of circa 935 dwellings.

By allocating the 'Site' for an additional 150 dwellings, the Council will be making efficient use of a site, which is already allocated and known for being suitable, achievable and deliverable for housing as well as meeting the sustainable objectives as outlined within the NPPF.

For the above reason, the 'Site' provides an excellent opportunity for the Council to deliver an additional 150 dwellings towards their increased housing need requirement.

d. Manston Airport

The Draft Local Plan also explains that following the closure of Manston Airport in May 2014, the Council has made significant efforts to support a functioning aviation use on site and has explored its CPO powers in seeking an indemnity partner and carried out soft marketing tests to seek an operator to run the airport.

The Council commissioned an airport viability study, prepared by Avia Solutions, which concluded that the airport operations at Manston are very unlikely to be financially viable in the longer term and almost certainly not possible in the period to 2031.

Having said this, the Council recognises the proposals being put forward by RiverOak Strategic Partners, as set out in the consultation document 2017, for an air cargo operation at the site, and the fact that an application for a Development Consent Order (DCO) is to be submitted to the Planning Inspectorate (PINS) to consider the airport as a National Significant Infrastructure Project (NSIP) in due course. To ensure that this process is not prejudiced, the Council is proposing not to allocate the Airport site for any specific purpose in the Draft Local Plan.

If a DCO for aviation use at the site is granted, this would require a partial review of the Local Plan in relation to housing land supply provisions, aviation and environmental policies and other related matters.

In the event that a DCO is not accepted or granted, or does not proceed, the Council will need to consider the best use for this site, in the next Local Plan review after a minimum of two years.

Given the location of the Manston Green site, CL have a particular interest in the future use of Manston Airport, especially should a DCO for continued aviation use be granted.

Whilst CL are not against the principle of re-opening the airport, CL are conscious that any proposal to develop the airport must have due regard to the extant planning permission and are concerned to safeguard the current and any future development plans at Manston Green. The airport expansion plans must also take into consideration future housing development, which is required to meet Thanet's growing population and on-going housing need.

As previously highlighted, if a market signals adjustment of 12% was applied to the latest household projection data, an objectively assessed housing need of 17,870 homes would be required. Given this

evidence, Thanet District Council are therefore in a position where additional sites will need to come forward for the delivery of housing to help address the Districts housing shortfall. Given the lack of brownfield land in the region, there will be a need to develop some homes to meet this need on sustainable and suitable Greenfield land.

Given the housing shortfall within the Thanet District, it is imperative that at least 785 dwellings on the Manston Green site is implemented and the authorised development delivered. Any proposed expansion of Manston Airport must therefore be sympathetic and give respectful consideration to the development plans of the site.

It is also important that future housing development in this area is not hindered in anyway by the proposed airport expansion plans. A strategy must therefore be put in place that ensures the interest of future development sites for housing are reliably protected.

Key matters that need to be considered include:

Noise and Vibration

Having assumed the closure of the airport in the long term, CL's Manston Green outline consent has been designed around a certain noise level, with the expectation that there would be no significant noise disturbance and no need therefore for specific noise attenuation/mitigation measures be designed in. Given that Manston Airport consultation document (2017) prepared by RiverOak Strategic contained no information on noise, it's anticipated that such measures will be required if the airport expansion proposals proceed and the associated costs of these measures will have a material impact on scheme viability.

Transport

Prior to the development of any plans to expand Manston Airport, consideration needs to be given to the transport work methodology approved as part of the Manston Green outline planning application. CL propose that the following matters need to be taken into account before any such decision is made:

Clarification on Multi-Modal Split

An estimate of transport modal split for passengers has been outlined, which equates to 3% by bus and the remaining 97% by car travel (7% taxi, 45% cars parked and 45% car drop off). Whilst it is suggested that travel plan measures will aim to increase sustainable travel, there is some concern that car travel will remain as the predominant method of travel leading to a significant impact on the highway network within the surrounding area.

Clarification on Travel Patterns

In addition to the modal split, confirmation of travel patterns for passengers and employees would be required in order to identify the likely daily/weekly/annually profile for travel, so as to determine how these will impact on the highway network throughout different times and not just the 'normal' peaks.

Traffic Distribution

Details of traffic distribution for the proposed development have not been provided at this stage. A clear understanding as to whether the assignment of traffic has been based on existing traffic movements, NOMIS data or assumptions is imperative. Certain parts of the highway network are subject to congestion and constraints and therefore this is an important factor in capacity assessment across the surrounding area.

Committed Development/Transport Schemes

The report states 'the committed developments and committed transport schemes will be discussed with KCC and Highways England and an agreement will be reached outlining which developments/schemes to include in which future baselines.' As a consequence, confirmation of which committed developments are being considered as well as any associated highway improvement

schemes which may be relied upon to support the application is considered critical in determining the available capacity in the surrounding network.

With this in mind, the transport improvements made to the highway network as part of CL's Manston Green development plan or any other proposed future improvement for that matter, must be taken into consideration.

Air Quality

Chapters 1-6 of the Preliminary Environmental Information Report (Volume 1) prepared as part of the Manston Airport DCO consultation documents in June 2017 addressed matters relating to Air Quality and stated that:

'Thanet generally has good air quality; however there are areas where air quality is poor due to pollution from road transport. The boundary of the proposed airport expansion abuts the boundary of the Thanet Air Quality Management Area (AQMA), which encompasses areas of Thanet where levels of nitrogen dioxide are above the national air quality objective for the protection of human health. In all cases, the main source of pollution is road transport.'

The report confirms that a desktop study into the current concentration of air pollutants has been undertaken to inform the preliminary air quality assessment. The study suggested that the potential effects that may arise as a result of the Manston Airport proposals are:

- Dust generated during construction phase;
- Dust soiling of the local road network due to the transport of dust and dirt from vehicles leaving the site during the construction phase;
- Emissions from the use of equipment and machinery on-site during construction;
- Vehicle emissions during both construction and operation;
- Emissions from aircraft movements on the ground during the land and take-off cycle, and
- Emission from aircraft ground support equipment.

Given the potential air quality effects that may arise as part of any proposal to reopen the airport, CL request that the proposed airport expansion ensures that adequate monitoring on the effects of air quality is undertaken and secured and that controls are put in place to ensure that the forecast emission levels do not exceed the acceptable level.

Biodiversity

CL also request that, should proposal for the reuse of the airport come forward, sufficient monitoring on the effects of biodiversity on the surrounding area is undertaken and secured in order to ensure that no negative impacts arise from the proposed reopening of the airport.

e. Summary

Having reviewed the Regulation 19 consultation document, CL are generally supportive of the principles set out within the Draft Local Plan.

However, CL are conscious that the adopted Local Plan must have due regard to the extant planning permission and that every effort is made to safeguard the development plans at Manston Green, especially given that the site is allocated for residential use and a Reserved Matters Application is in the process of being prepared.

Taking into account the latest householder projections, CL are of the opinion that a more substantial uplift to the Council's OAN (currently set as 17,140) should be considered to contribute to achieving the Government's aim of improving affordability. If a market signals adjustment of 12% was applied to the latest household projection data, this would generate a need for 17,870 homes. CL consider that the housing requirement should be amended accordingly.

In order to meet this increased housing need, the Council should positively seek opportunities to identify and allocate more suitable, deliverable and sustainable sites for the District.

By allowing a slightly higher density and incorporating all developable land included within CL's option agreement, the land at Manston Green could accommodate an additional 150 dwellings (total of 935 dwellings), which would go towards the Council's revised housing need target.

By allocating the site for an additional 150 dwellings, the Council will be making efficient use of a site which is already allocated and has outline planning permission and thus known for being suitable, achievable and deliverable for housing.

CL also stress that any proposal to maintain the aviation use of Manston Airport must respect and have due regard to the extant planning permission for the development of the Manston Green site and any future development opportunities in this location.

Consideration must be given to the potential highways and noise impacts that may occur from the reopening of the Airport on future housing proposals. Other key considerations include reviewing the potential impact that may be caused by a proposal to reopen Manston Airport in regards to air quality and biodiversity. With this in mind, CL request that sufficient monitoring on the effects of technical implications on the surrounding area are undertaken to ensure that no negative impacts arise from future airport plans.

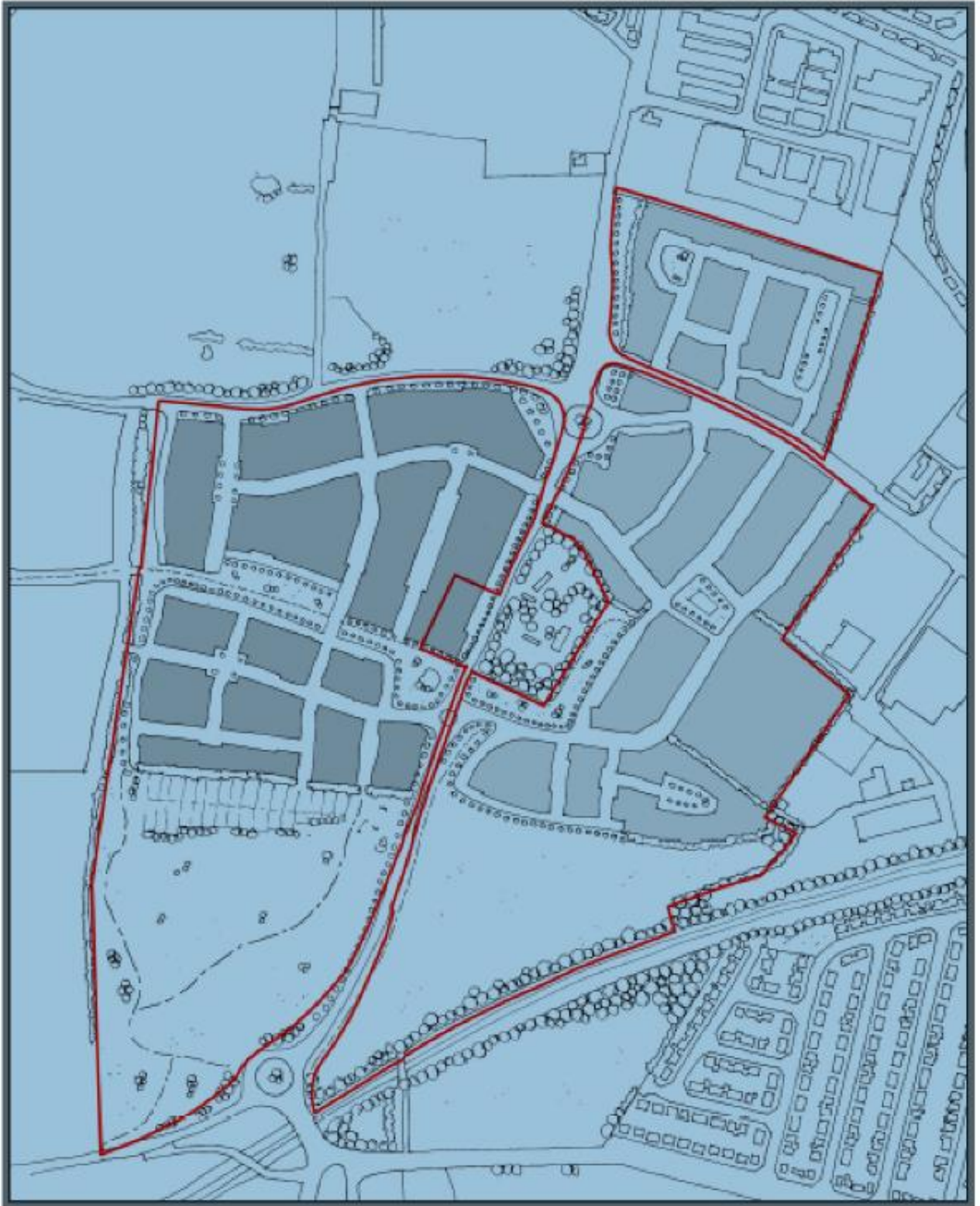
We trust that the above comments can be incorporated as part of the Council's Draft local Plan consultation exercise and we would be grateful for confirmation that these representations have been received. CL also confirm that they would like to be involved in future stages of the plan-making process. We trust that the information provided is sufficient at this stage, however, should any additional information be required then please do not hesitate to contact me on 02034354227/ lscafe@lcnlprojects.com.

Yours faithfully,



Leo Scarfe MRTPI

Senior Planner



MANSTON GREEN - ILLUSTRATIVE BLOCK STRUCTURE

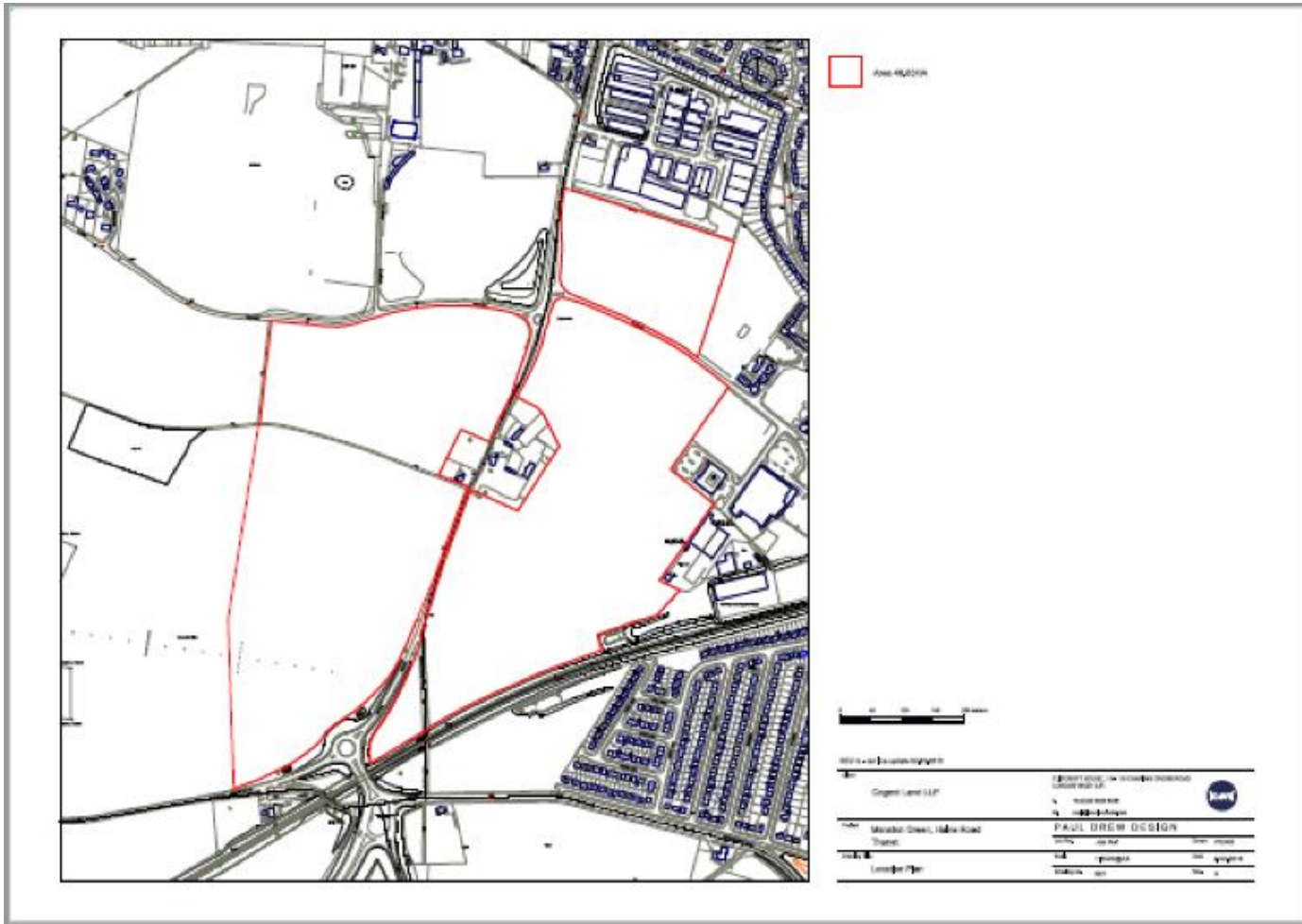
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Illustrative Masterplan
Manston Green, Haine Road,
Thanet

1:2000@A1
 22.05.2015
 Paul Drew Design for Cogent Land LLP



Appendix 2 – plan attached to Manston Green permission and Applicant’s Year 20 daytime noise contour (ES Figure 12.6 in [APP-042])

