



RiverOak Strategic Partners

Comments on Written Representations

TR020002/WRC

Examination Document

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Application Ref:	TR020002
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Manston Airport DCO – Comments on Written Representations

THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES 2010

RIVEROAK STRATEGIC PARTNERS

MANSTON AIRPORT DCO

PLANNING INSPECTORATE REFERENCE: TR020002

Applicant's Comments on the Written Representations Submitted at Deadline 3

8 March 2019

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0 INTRODUCTION

Purpose and Structure of this document

0.1 This document provides the comments of the applicant, RiverOak Strategic Partners (the Applicant) in response to the written representations submitted to the Examining Authority (the ExA) for Deadline 3 (15 February 2019).

This document is structured in four parts:

- **Part 1** provides the Applicant's comments in response to written representations submitted by Interested Parties with statutory functions;
- **Part 2** provides the Applicant's comments in response to written representations submitted by other Interested Parties (without statutory functions); and
- **Part 3** provides the Applicant's comments in response to general topics raised in the written representations submitted by members of, or representatives of, local communities within the vicinity of the Proposed Development.
- **Part 4** provides the Applicant's comments in response to more specific topics raised in the written representations submitted by members of, or representatives of, local communities within the vicinity of the Proposed Development.

0.2 In relation to Part 1 and the Applicant's comments in response to written representations submitted by Interested Parties with statutory functions, the Applicant has not provided comments on every point made within the written representations. The Applicant has sought to provide comments where it is helpful to the ExA to do so, for instance where a written representation includes a request for further information or clarification from the Applicant or where the Applicant considers that it would be appropriate for the ExA to have the Applicant's views in response to a matter raised by an Interested Party in its representations.

0.3 In relation to Part 2, the Applicant has provided comments in response to the written representations submitted by Stone Hill Park Limited and the Royal Society for the Protection of Birds as the first is the most significant landowner subject to compulsory acquisition powers and the second is a national organisation that had not previously made a representation.

0.4 In relation to Parts 3 and 4, the Applicant has not provided comments on every written representation submitted to the ExA by members of the public and local organisations because many of the issues raised are common to several representation and many have been dealt with previously by the Applicant, for instance in response to questions posed by the ExA in its first round of written questions or within one of the application documents

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submitted to the Examination. Other written representations expressed objections in principle to the Proposed Development or expressions of opinion without supporting evidence. For the avoidance of doubt, where the Applicant has chosen not to comment directly on matters raised by Interested Parties this is not an indication that the Applicant agrees with the point or comment raised or opinion expressed. The Applicant has provided comments on the key issues raised in the written representations in two ways: where general issues were raised these are addressed in part 3, and where specific points were made (in many cases several times) these are addressed in part 4 in the form of an FAQ.

1 PART 1: INTERESTED PARTIES WITH STATUTORY FUNCTIONS

1.1 Natural England [\[REP3-089\]](#)

NE's written representation sets out the conservation designations potentially affected by the proposals and then provides details of four key concerns NE currently has about the Applicant's proposals. The Applicant's response to the points raised is set out in the following table.

Issue raised	Applicant's response
<p>3.2.1 Golden Plover Golden plovers are a wading bird that spend time feeding on the intertidal habitat of Pegwell and Sandwich Bays, but also make use of terrestrial habitat inside and outside the designated nature conservation sites. The most favoured habitat outside the designated site is winter cereal fields, but significant use is made of pasture and ploughed or bare fields.</p> <p>3.2.2 Surveys for the application found a peak count of 530 golden plovers using a field to the south of the airfield red line boundary, and west of the A299 (figure 3.1 in Appendix 7.5 [APP-045]). Use of the same field by a peak of 402 birds was recorded by Henderson and Sutherland², also in November 2016 (figure 4.4 in the Ecological Desk Study Report [APP-045] erroneously records this count as being from within the airfield red line boundary). Paragraph 4.2.4.4 of the RIAA [REP1-007] states that at the end of November 2016 the field was cultivated and became unsuitable for golden plovers.</p> <p>3.2.3 The survey records show that golden plover distribution is highly dependent on arable cropping regime. The field to the SW of the airfield is likely to be favoured when it is in an appropriate cropping regime as it is relatively close to Pegwell Bay. Natural England's view is that the presence of high counts of golden plover in this field</p>	<p>Noted.</p>

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<p>adjacent to the airfield demonstrates that the area can be considered functionally linked to the SPA.</p>	
<p>Golden Plover Construction disturbance</p> <p>3.2.4 Natural England agrees with the use of a 750m buffer around the site within which disturbance to birds could occur. Given that suitable habitat is present, and significant numbers of golden plovers have been recorded on occasion, Natural England agrees that construction disturbance could have a likely significant effect on the SPA.</p> <p>3.2.5 Paragraph 4.2.4.9 of the RIAA [REP1-007] concludes that as the area within 750m of the site does not form an important part of the foraging grounds for the SPA golden plover population and as there is extensive alternative habitat available, then displacement would have a negligible effect.</p> <p>3.2.6 Natural England does not agree that displacement would have a negligible effect. However, mitigation measures are included in the application documents that would minimise the potential for disturbance. These include the best practice measures set out in Table 5 of the CEMP [REP1- 009], and the use of CFA piling as set out in paragraph 3.3.158 (Chapter 3) of the main ES [APP-033]. These mitigation measures, and the temporary nature of the construction works, lead Natural England to conclude that although the 750m buffer supports golden plovers when agricultural practices are favourable, construction would not have an adverse effect on the integrity of the site.</p>	<p>Noted.</p>
<p>Golden Plover Operational displacement - habitat loss due to bird scaring activity</p> <p>3.2.7 Provided that bird scaring activities will be restricted to the airfield itself (and not on adjacent farmland) Natural England agrees that a 1km buffer is an appropriate distance within which to assess impacts. However, as requested in our Relevant Representation, confirmation of the bird scaring methodology to be used at Manston</p>	<p>The Applicant disagrees that the integrity of the site would be significantly affected. The Applicant notes that Natural England has asked for further information to support this assertion and this will be provided in due course.</p>

<p>would be helpful, for example how often will pyrotechnics be used.</p> <p>3.2.8 Paragraph 4.2.4.13 of the RIAA [REP1-007] concludes that as the area within 1km of the Order Limits does not support golden plovers on a regular basis, effects from displacement are considered negligible.</p> <p>3.2.9 Natural England does not agree that displacement from this area can be considered negligible. As noted above, the farmland within 1km supports significant numbers of golden plovers when agricultural practices are favourable, and the area to the SW is likely to be favoured due to the proximity to Pegwell Bay. Only one year's survey is presented, therefore, there is no evidence that the area is not regularly used by golden plovers.</p> <p>3.2.10 In order to determine whether the effective loss of habitat within the 1km buffer will have an adverse effect on the integrity of the site, it would be helpful if information could be provided on the proportion of functionally linked land that would be lost; any reason why not all of the land within the 1km buffer would be suitable for golden plovers (eg fields are too small); the crop rotation within the 1km buffer (ie how often the land would be suitable for golden plovers). Without this information it is difficult for Natural England to advise on whether mitigation is required to ensure that the displacement of golden plovers due to bird scaring would not result in an adverse effect on the integrity of the SPA.</p>	
<p>Golden Plover Operational disturbance from aircraft</p> <p>3.2.11 Waterbirds are perceived to be more susceptible to being disturbed by short, sharp 'peaks' of noise (LA_{max}) e.g. during piling (or bird scaring activities), rather than an increase in 'continuous equivalent noise levels' (LA_{eq}), which form the basis of most noise assessment protocols. There are no clearly defined noise thresholds at which disturbance to waterbirds would be expected; this is because there are a large range of factors influencing how and to what extent birds are disturbed, and how 'disturbing' a noise event is perceived to be. This is also inextricably linked to the ambient noise</p>	<p>Noted.</p> <p>As discussed with Natural England additional contour maps are being provided at Deadline 4.</p>

levels, because a 'peak' noise event represents a sudden change from baseline conditions. The response from waterbirds to disturbance can range from head lifting and short 'escape' flights, up to complete abandonment of an area and extended flights to other feeding grounds in the estuary, all of which can result in a decreased time spent feeding, with a potential corresponding effect on body condition and survival rates.

3.2.12 Natural England does not advocate the use of noise thresholds because the impact of a particular noise stimulus on a bird population is site and species specific. As with other forms of disturbance, bird response varies with other factors such as degree of habituation to ambient noise levels, flock size and availability of resources such as foraging and roosting habitats. For example, a redshank in an industrial area may have less reaction to a noise event than a redshank on a pristine, undisturbed estuary. Furthermore, the fact that a bird does not fly away does not necessarily mean that it is not impacted by disturbance: it may be close to its energy budget and not be able to fly away, or it may have no alternative sites to fly to, but by remaining in situ it will be subject to stress, which further impacts its energy budget. Therefore, it is difficult to say with certainty, that below a certain threshold, disturbance to a particular bird species will not occur. Nevertheless, we accept that the use of noise levels can be helpful in understanding the area that will be potentially affected, and hence help devise mitigation measures.

3.2.13 For these reasons, Natural England does not agree with the approach taken in the ES or RIAA [REP1-007] whereby a threshold of 70dB is used to define the level below which no effect will occur. Furthermore, the 70dB threshold is taken from work carried out by the Institute of Estuarine and Coastal Studies (IECS) on the "Waterbird Disturbance Mitigation Toolkit Informing Estuarine Planning and Construction Project". This followed work which had been undertaken on the Humber Estuary in response to casework. The IECS carried out a literature review of bird disturbance and reported (in 2009) that there was little evidence available on the impacts of construction disturbance to birds. On this basis it is unclear how the very specific noise and distance 'triggers' for individual species of birds were derived for the subsequent toolkit.

3.2.14 It should also be noted that the Humber Estuary is a SPA/ Ramsar site and therefore no construction works have been carried out that would cause significant disturbance to SPA/ Ramsar birds. Evidence collected from monitoring work associated with construction disturbance undertaken on this site has either been carried out outside the sensitive season, when there are low numbers of birds present; or when the competent authority has already determined that the proposed works will not adversely affect the integrity of the designated site. Given these limitations it is not recommended that the 70dB threshold is used as a generic threshold for noise levels which result in moderate to high disturbance of birds.

3.2.15 For all these reasons it seems clear that generic noise threshold levels are unlikely to offer a suitable approach for assessing the potential effects of noise on birds. Natural England, therefore advises that a more suitable approach would be to assess the change in noise levels. This requires a comparison of the predicted new noise level to existing noise levels, thus necessitating the accurate measurement of existing noise levels in the vicinity of environmental receptors as a baseline.

3.2.16 As requested in our Relevant Representation, and prior to that, Natural England recommends that noise contour maps are produced (for both peak LA_{max} and continuous LA_{eq} noise levels) showing contours in 5dB increments from 55dB upwards. This reference to 55dB does not mean that Natural England considers that noise above this will have an adverse impact. However, we would like to see contours mapped below 70dB, as we do not agree that below this that effects will be negligible, for the reasons explained above.

3.2.17 In order to assess the impacts of the proposal, it will be necessary to compare the predicted noise contours with maps showing the current noise levels, using the same contour intervals. These maps should be overlain with the designated site boundaries, and the locations of birds (including use of functionally linked land). This will then enable a judgement to be made of the change in noise predicted to be experienced by birds in particular locations.

LA_{max} and LA_{eq} noise contour maps, with contours at 5dB intervals, also showing coastal designated sites, have been prepared and are being submitted at Deadline 4 as requested.

The locations of birds recorded during surveys of coastal sites were presented in ES Chapter 7 **[APP-033]**, Figures 3.2a-d, 3.3, 3.4, 3.5 **[APP-037]**.

It is not possible to provide current aircraft LA_{eq} and LA_{max} contours as the airport is not currently operational.

<p>3.2.18 Until this information is presented, Natural England's view is that a conclusion of no adverse effect on the integrity of the SPA from aircraft disturbance is premature.</p>	
<p>Turnstone</p> <p>3.2.19 The turnstone is a species that is confined to intertidal habitat and does not make use of terrestrial habitat inside or outside the SPA boundary. Therefore, Natural England agrees that significant effects from construction disturbance, bird scaring and operational barrier effects can be ruled out.</p> <p>Operational disturbance from aircraft</p> <p>3.2.20 Natural England notes that survey results indicate that turnstones do not use intertidal habitats for foraging and roosting within the area where aircraft are predicted to fly over at altitudes of less than 500m (figure 4.6 in the RIAA). Paragraph 4.4.3.5 of the RIAA [REP1-007] suggests that turnstones will readily habituate to disturbance, and that they react to the presence of humans at a much shorter distance than other species. Natural England's advice is that habituation is not the same as tolerance and evidence that certain individual birds may tolerate (rather than habituate to) a certain amount of disturbance (from a variety of different sources and not just noise) elsewhere within the species' range, does not demonstrate different individuals will respond in the same way following exposure at the planning application site - the context of the site is vital. Experiments have shown that if turnstones are fed with mealworms, they fly away at greater distances from disturbance³. This suggests that lack of flight in response to disturbance in this species does not necessarily mean that birds are habituated, but that they may not have the energy reserves to expend on flight.</p> <p>3.2.21 For the same reasons as set out above for golden plovers, Natural England advises that it is premature to rule out an adverse effect on the integrity of the SPA</p>	<p>Noted. However, the Applicant is unclear what paragraphs 5.3.16-17 relate to as the letter does not contain paragraphs referenced. The Applicant assumes this should be 3.2.16 and 3.2.17.</p> <p>The noise contour maps referred to in relation to 3.2.16 above and the maps illustrating the distribution of turnstone recorded during surveys, as presented in ES Chapter 7 [APP-033], Figure 3.3 [APP-037], will assist Natural England in understanding the conclusions of the assessment provided in the ES.</p>

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turnstone population until the noise assessment set out in paragraphs 5.3.16-17 of this letter is carried out.	
<p>Little Tern</p> <p>3.2.22 Little terns are a feature of the SPA but no longer breed within the site. Nevertheless we welcome the fact the RIAA considers whether the proposal would hinder the species' return. As it is a coastal species, we agree that significant effects through construction disturbance, bird scaring and operational barrier effects can be ruled out.</p> <p>3.2.23 Natural England notes that the closest available nesting area for little tern is at Shell Ness on the southern edge of Pegwell Bay, and that this is outside the area where aircraft are predicted to fly over at altitudes of less than 500m. The noise assessment recommended above will aid understanding as to whether the additional disturbance from aircraft disturbance is likely to be significant enough to deter little terns from returning to the site.</p>	<p>Noted.</p> <p>The noise contour maps referred to in relation to 3.2.16 above will assist the assessment.</p>
<p>SSSI bird species - sanderling, grey plover and ringed plover</p> <p>3.2.24 Sanderling, grey plover and ringed plover are species that are largely confined to intertidal habitat and do not make use of terrestrial habitat outside the SPA boundary. Therefore, Natural England agrees that significant effects from construction disturbance, bird scaring and operational barrier effects can be ruled out.</p> <p>Operational noise from aircraft</p> <p>3.2.25 Noise contour mapping showing the change in the noise environment likely to be experienced by SSSI waders will be helpful in understanding whether there will be a significant impact on the SSSI.</p>	<p>Noted.</p> <p>The noise contour maps referred to in relation to 3.2.16 above and the figures mapping the distributions of waders recorded during surveys, as presented in ES Chapter 7 [APP-033], Figures 3.2a-d, 3.3, 3.4, 3.5 [APP-037] will assist the assessment.</p>

<p>Conclusion on ornithological impacts</p> <p>3.2.26 In order to be able to assess whether there will be an adverse effect on the integrity of the SPA and SSSI, Natural England advises that the following information should be provided:</p> <p>a. To determine the potential impacts of bird scaring on golden plovers: the proportion of functionally linked land that would be lost; any reason why not all of the land within the 1km buffer would be suitable for golden plovers (eg fields are too small); and the crop rotation within the 1km buffer (ie how often the land would be suitable for golden plovers).</p> <p>b. To determine the potential operational disturbance to golden plovers, turnstones and little terns, and SSSI waders, from aircraft: predicted noise contour maps (for both peak LA_{max} and continuous LA_{eq} noise levels) showing contours in 5dB increments from 55dB upwards. This should then be compared to existing noise contour maps, and overlain with the designated site boundaries and key bird locations, to assess the change in the noise environment of the SPA.</p>	<p>Information to be provided to NE.</p> <p>Noted. See comments in relation to paragraphs 3.2.16, 3.2.17, 3.2.21 and 3.2.25 above.</p>
<p>3.3.1 In our Relevant Representation, Natural England raised questions and concerns over the permitting regime for the surface water discharge to Pegwell Bay, and regarding the designated site features that would potentially be affected.</p> <p>3.3.2 We note that the Environment Agency, in their response to the ExA's first questions, has confirmed that as the applicant plans to discharge clean, uncontaminated effluent via an existing surface water outfall, then no permit or authorisation is required. This is helpful clarification, however Natural England advises that certainty is required for the HRA that the surface water will be uncontaminated.</p>	<p>The Environment Agency (EA) is the regulator for surface water discharges and therefore control the permitting regime. Consequently, any decisions regarding the nature of the permit will be made by them. As noted in the ES [APP-033] the Applicant has had discussions with the EA regarding the need for, and the type of permit required. The Applicant's expectation is that, if a permit is required, it will set limits on the concentration of key contaminants used at the airport (e.g. hydrocarbons and de-icer) but will not set volumetric limits to control the discharge rate.</p>

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	The permit will provide the necessary controls on the discharge such that it does not need to be further addressed at this stage.
<p>3.3.3 The outline Drainage Strategy (DS) [APP-048] states that run-off from the runway and aprons will be treated by a light liquid separator and aeration system, then a Sustainable Drainage System (SuDS) comprising two ponds. Run-off from roofs and car parks will flow through permeable paving and then into the SuDS. Run-off from the fuel farm will be treated by an oil water separator.</p> <p>3.3.4 In principle, SuDS can be an appropriate way of treating surface water run-off to an acceptable standard to avoid impacts on designated sites. Natural England would normally advocate the use of the risk-mitigation index in the CIRIA SuDS Manual (2015)⁴ to demonstrate the SuDS are sufficient. The index approach set out in Chapter 26, section 26.7.1 of the SuDS Manual, defines the pollution hazard index, which should be compared against the mitigation index. To deliver adequate treatment, the selected SuDS components should have a total pollution mitigation index (for each contaminant type) that equals or exceeds the pollution hazard index (for each contaminant type). If the applicant set it out in this way, it would make it clear that the SuDS components chosen are appropriate, and sufficient, to address the pollutants arising from the development.</p> <p>3.3.5 However, the approach in the CIRIA SuDS Manual does not cover the specific pollutants, including de-icers and chemicals resulting from emergency fire responses. Therefore, detail on the aerators that would be used to address these contaminants would be helpful. Natural England would also wish to see monitoring of the outflow of the ponds on site, with emergency measures incorporated, to ensure that contaminated water does not enter the designated site.</p> <p>3.3.7 In principle, SuDS are an appropriate way of avoiding pollutants entering sensitive designated sites. However, Natural England recommends using the risk-mitigation index approach in the CIRIA SuDS Manual to demonstrate that the SuDS</p>	<p>Comments are noted. However, the design of the surface water drainage system is in outline only and has not been advanced to detailed design.</p> <p>The detailed design of the drainage system will be subject to approval by the Secretary of State and the Environment Agency as a pre-commencement condition (Requirement 13 in Schedule 2 of the dDCO).</p>

<p>proposed is sufficient. Furthermore, clarity is required over the additional measures required to address the specific pollutants arising from the runway and aprons. Monitoring will also be required, with emergency measures incorporated, to ensure that contaminated water does not enter the designated site.</p>	
<p>3.3.6 Whilst the surface water will be discharged to Pegwell Bay via an existing outfall, the outline DS states that some works are required on the scour protection, and that a channel that directs flows from the headwall of the outfall to the sea is partially buried by sand, which will need to be cleaned, repaired and refurbished. In our Relevant Representation, Natural England requested confirmation of the designated sites and interest features that have the potential to be affected by the surface water outfall (the outfall discharges to Sandwich Bay SAC, but the boundary of Thanet Coast SAC is only 200m away). This is necessary so that the impacts of work to the outfall (scour protection and channel) on designated site habitats and species can be fully assessed.</p> <p>3.3.8 Confirmation of the designated sites and interest features that have the potential to be affected by the surface water outfall is required. This is necessary so that the impacts of work to the outfall (scour protection and channel) on designated site habitats and species can be fully assessed.</p>	<p>It should be noted that works to the outfall will be limited to routine maintenance and there is not current plan to materially modify the structure.</p> <p>The ES [APP-033] concludes that, as the discharge is clean water and the outfall is engineered/constructed to prevent scour, it will not have a significant adverse effect on the habitats that support the features of the Thanet Coast and Sandwich Bay SPA and Ramsar Site, or the features of the other designated sites within which Pegwell Bay is situated (Sandwich Bay SAC, Sandwich Bay to Hacklinge Marshes SSSI and Sandwich and Pegwell Bay National Nature Reserve). There is no reason to suggest that this conclusion is not robust for the reasons outlined below.</p> <p>The surface water outfall is located within the Thanet Coast and Sandwich Bay SPA and Ramsar Site, discharging onto intertidal mud/sand. The outfall is approximately 15m from the Sandwich Bay SAC, Sandwich Bay to Hacklinge Marshes SSSI and Sandwich and Pegwell Bay National Nature Reserve. Due to its location within the SPA/Ramsar, and proximity to the other designated sites, Section 7.9 of the ES refers to designated sites and it also describes the qualification / interest features of the sites, most of which are landward of the outfall (e.g. the dune communities of the SAC/SSSI). No intertidal priority coastal</p>

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	habitats are located in close proximity to the outfall e.g. saltmarsh at 200m and mudflat at 1,450m.
<p>3.4.1 The Habitats Regulations require plans and projects to be considered "in combination". This is so that multiple impacts, which may in themselves be considered to not have a likelihood of significant impact and have thus been screened out (or considered that there is no adverse effect on the integrity of designated sites), do not combine with other projects to produce a significant impact in combination".</p> <p>3.4.2 Clarity on this was provided within the Wealden judgement. Please also note that much of the guidance quoted in the air quality chapter of the ES (Chapter 6 [APP-033]) is dated prior to the Wealden judgement so all screening criteria quoted should be considered on the "in combination" impacts of the proposal and not on the impacts of the proposal "alone".</p>	<p>Agreed. As documented in the ES, other committed developments have been reviewed and are not expected to produce significant in-combination effects except through increases in road traffic, all of which have been assessed in the ES.</p> <p>The Wealden judgement is noted.</p>
<p>3.4.3 Chapter 18 [APP-035] discusses cumulative impacts and states “cumulative effects from major developments beyond 5km of the Proposed Development application boundary would be limited to traffic and transport effects, and these are already accounted for in the air quality, noise and traffic and transport assessments”. It appears from Chapter 16 -“Traffic and transport [APP-034] that TemPro has been used which includes future growth of traffic including the Local Plan. However, it is not entirely clear whether air quality from increased traffic as a result of the proposals are considered "in combination" with Local Plan figures or are considered as an “addition” and thus considered "alone" over the higher baseline.</p> <p>3.4.4 This is an important point and clarity is required on this. Our comments below therefore relate to the information presented in Chapter 6 and 7 [APP-033] and if "in</p>	<p>The road traffic data uses TempPro factors and also takes into account the effects of the Local Plan on traffic growth. These traffic flows are used for the future baseline scenario and are also included in the With-Development scenario. Therefore, the air quality impacts of future traffic growth are not included in the PC results presented in the ES, but are included in the PEC.</p>

<p>combination" has not been correctly applied then further information will be required for air quality impacts.</p>	
<p>3.4.5 Please note that areas where further assessment is required are those over 1% (without decimal point accuracy) so those under 1.5% are considered as 1% for the purposes of this review.</p>	<p>The use of 1.5% rather than 1.0% as a threshold is based on IAQM guidance quoted in paragraph 6.2.40 of the ES [APP-033]. Although this guidance predates the Wealden case there is nothing in the judgement which contradicts the reasoning behind this guidance.</p>
<p>3.4.6 Natural England welcome the use of APIS to consider the background however the date of the last APIS update should be considered and other potential increases from other plans or projects need to be added to the APIS figure if those proposals have become operational since the last APIS update. If these are not taken into account within the background figures then these should be added to the modelling figures to ensure potential impacts from all relevant plans and projects are correctly assessed.</p>	<p>The ES used data on APIS that was current at the time the assessment was being carried out (autumn 2017) including background maps based on 2013–2015. The Applicant notes that APIS was updated to 2014–2016 but has since has rolled back to the previous 2013–2015 data pending correction of errors.</p> <p>APIS does not provide projections to future years, but 20-year trends in nitrogen deposition and acid deposition at sites around Manston Airport are flat or decreasing. Given this, and considering measures locally and nationally to reduce emissions of NO_x and NH₃, it is considered conservative to use current deposition rates for future years. No other plans or projects have been identified that are likely to generate enough emissions to overturn this conclusion.</p>
<p>3.4.7 We note from a recent telephone conversation with the applicants that the cross source attribution has been assessed (ie roads transport plus airport where the distance criteria overlaps) however this is not demonstrated in the contour plots as noted in Paragraph 6.1.6 of the ES [APP-033]. It would be more useful if the contour plots were able to demonstrate this overlap and also for the contour plots to clearly</p>	<p>Using the transect (DMRB) approach to modelling roads means gridded concentrations are not readily available, so contour plots could not be produced. Because the impact from roads is normally confined to receptors within a few tens of metres of the road, contour plots are harder to read and of less value for road</p>

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<p>show where the process contribution of NO_x is more than 1% (or relevant proxy) of the critical level where the background is at or over 100% of the critical level. This would clearly illustrate the areas of habitat that are discussed further as to potential effects on designated sites within Chapter 7 [APP-033].</p>	<p>sources than they are for extensive area sources such as the airport.</p>
<p>3.4.8 Table 6.2 [APP-033] in response to a PINS comment states "The previous airport operator funded TDC to operate a continuous monitor near the airport..." however the same table at page 6-14 in response to a comment from Natural England states "No information on impacts of previous airport use is available..." We note following a recent telephone conversation that the lack of information relates to ecological monitoring but recommend that some clarification is provided within the relevant text to explain the apparent disparity between these comments.</p>	<p>The former continuous monitor provided measurements of concentrations in air at a single location, downwind of the airport. This location is not representative of ecological receptors. Impacts of previous airport operations at ecological sites would need to be determined through modelling, which has not been carried out for this ES. Modelling of the proposed development suggests that any ecological monitoring of the sites would struggle to distinguish impacts from airport operations (past or future) from other sources, since the former would constitute just a small percentage of the total.</p>
<p>3.4.9 Paragraph 6.4.9 [APP-033] relates to distance criteria for evaluating air quality impacts. This has been taken from the EA permitting guidance that identifies the distance criteria for SSSIs, NNRs and LNRs as 2km however Natural England's distance criteria for planning is 5km for SSSIs. Further information is therefore required as to whether additional SSSIs should have been included in the modelling.</p>	<p>The Applicant is not aware of any SSSIs in the 2 km to 5 km distance band, and therefore there are no additional SSSIs that need to be assessed but have not been.</p>
<p>3.4.10 Where Defra maps are used instead for near roadside locations, we welcome the use of a model adjustment factor to correct possible under prediction from Defra maps and also that the most sensitive habitat has been considered at the designated sites. We also welcome the use of conservative assumptions and the CURED model.</p>	<p>Noted.</p>

<p>3.4.11 Paragraph 6.8.25 [APP-033] summarises that the process contribution of annual mean NO_x from the proposals is "small" at less than 5%. This is misleading as a process contribution of over 1% is such that it cannot be considered "insignificant" and requires further consideration as to whether there will be an adverse effect on the integrity of the sites where the sites are sensitive to air quality impacts. We recommend that this wording is amended to correctly reflect the potential risk of significance.</p>	<p>The point is noted. However, the Applicant is confident that the significance of the effects has been assessed accurately.</p>
<p>3.4.12 Tables 6.14, 6.21 and 6.27 [APP-033] identify the maximum PCs and PECs for annual mean NO_x at the relevant years modelled. These tables identify the worst receptors but all receptors where the process contribution is more than 1% of the CLe and the background is close to/or over the CLe must be considered against the relevant interest features of the designated sites rather than just the worst receptors.</p>	<p>Tables 6.14, 6.21 and 6.27 [APP-033] are summary tables showing the worst case receptors. Full results at all receptors are provided in Appendix 6.5 [APP-044]; these are too voluminous to include in the main text. Impacts at all receptors have been considered in the assessment.</p>
<p>3.4.15 Table 6.40 [APP-033] summarises the significance of effects. The rows relating to ecological effects both note in the rationale that some designated sites do not meet the EA criteria for further assessment "largely because of the background deposition rates". This is misleading as it is the process contribution in combination that is being assessed as a consideration of the percentage of the critical load or level and not of the background rates. The text requires amendment within this table to avoid any misunderstanding and to clarify that this is where the background rates are below the critical load or level and as such there is "headroom" where this is appropriate.</p>	<p>Agreed, this sentence is confusing. The sentence (both occurrences) should read:</p> <p>"Some Ramsar, SAC, SPA and SSSI receptors do not meet the EA criteria for not requiring further assessment."</p>
<p>3.4.18 Paragraph 7.10.16 mentions committed development but as noted previously, it is unclear whether air quality impacts "in combination" from the Local Plan have been taken into account.</p>	<p>See response in respect of NE para 3.4.3 addressed in the AQ responses.</p>

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<p>3.4.19 Paragraph 7.10.22 appears to have transposed some of the wording in the EA guidance. This requires checking.</p>	<p>The Applicant has checked and believes the wording in Paragraph 7.10.22 correctly represents the EA guidance.</p>
<p>3.4.20 Paragraph 7.10.24 refers to best available technology (BAT). This is relevant to permitting (e.g waste water treatment works etc) but is not relevant to planning or the Habitats Regulations.</p>	<p>Noted.</p>
<p>3.4.21 Paragraph 7.10.36 states “for NO_x concentrations in air to have negative effects on vegetation there has to be correspondingly high levels of SO₂ and O₃ and the level for NO_x should only be applied where levels of SO₂ and O₃ are close to their critical levels”. This rationale has also been used in paragraph 7.10.20. This is only the case for daily mean NO_x and not for annual mean NO_x which is the subject of this assessment. As daily mean NO_x impacts have been screened out, this statement is not relevant to consideration of annual mean NO_x impacts as it is not appropriate to use this higher critical level for annual mean NO_x</p> <p>3.4.22 Construction and operation phase effects sections for years 2, 6 and 20 specifically consider the impact of NO_x on the designated sites but all appear to be incorrect. These sections all state that whilst the PC will be over 1% of the critical level, the total concentration is below 30 micro g m⁻³. This is clearly not the case as evidenced in Chapter 6 on air quality (see tables 6.14, 6.21 and 6.27) [APP-033].</p> <p>3.4.23 These sections also consider effects on Thanet Coast SSSI only in many cases. There has been no assessment of air quality impacts on other designations where they are impacted by increased road emissions (see paragraph 3.4.15 in this document)</p> <p>3.4.24 These sections on the assessment of the impacts are key to the PINS appropriate assessment to determine whether the impacts will have an adverse effect</p>	<p>The statement quoted comes from APIS [http://www.apis.ac.uk/nitrogen-oxides-grasslands] which indicates that it applies to annual mean NO_x as well as daily mean NO_x. However, the Applicant notes that the annual mean critical level is set by legislation, and APIS does not suggest an alternative critical level for where SO₂ and O₃ are not near their respective critical levels.</p> <p>See Errata sheet (enclosure 2 to D3 covering letter – DOC REF) with reference to the Air Quality analysis issued at Deadline 3 which updates the assessment and results in all assessed locations.</p> <p>The Applicant is unclear which locations are being referred to in this comment. A response to Paragraph 3.4.15 is presented earlier.</p>

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<p>on the integrity of the designated sites. Until this further information is presented, Natural England's view is that a conclusion of no adverse effect on the integrity of the designated sites from air quality impacts is premature.</p>	<p>Noted.</p>
<p>Conclusion on air quality impacts</p> <p>3.4.25 The following conclusion relates to the information presented in Chapter 6 and 7 [APP-033] and if “in combination” has not been correctly applied then further information will be required for air quality impacts.</p> <p>3.4.26 Acidity levels on ecological receptors (inc priority habitat and local wildlife sites (LWS)) on all years modelled fall below the level of potential significance and we are therefore satisfied that no further consideration is required.</p> <p>3.4.27 Nutrient Nitrogen deposition on all years modelled for major receptors (European sites and SSSIs) fall below the level of potential significance and we are therefore satisfied that no further consideration is required. Natural England defers to others on LWS and priority habitat and our comments relate to national and European sites only.</p> <p>3.4.28 Daily mean NOx (short term) on ecological receptors (inc priority habitat and LWS) on all years modelled fall below the level of potential significance and we are therefore satisfied that no further consideration is required</p> <p>3.4.29 Annual mean NOx all years tested will be over level of “insignificance” for some of the receptors for European sites from both localised airport impacts and from increased NOx on roads further away from the application site.</p> <p>3.4.30 Some (but not all) of these annual mean NOx impacts have been subject to further assessment in Chapter 7 [APP-033]. However Chapter 7, Section 10 assessment of air quality impacts on designated sites needs to be completely revisited.</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>See Errata sheet with reference to the Air Quality analysis issued at Deadline 3 which updates the assessment and results in all assessed locations.</p> <p>See Errata sheet with reference to the Air Quality analysis issued at Deadline 3 which updates the assessment and results in all assessed locations.</p>

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<p>3.4.31 Until the further information requested in the above paragraphs have been presented, Natural England's view is that a conclusion of no adverse effect on the integrity of the designated sites from air quality impacts is premature.</p>	<p>Noted.</p>
<p>3.5.1 As noted in section 4.4 of this written representation, the applicant has not yet completed the necessary surveys to identify and characterise all potential bat roosts. Therefore, the mitigation and compensation measures (Appendix 7.13 Mitigation and Habitat Creation Plan [APP-046]) have been designed based on the worst case scenario. Natural England has provided the applicant detailed comments on the Mitigation and Habitat Creation Plan. Broadly speaking, we agree with the approach taken, and our view is that the provision of the bat barn, bat bunkers and bat boxes, are suitable compensation for losses. However, we have made the following recommendations:</p> <ul style="list-style-type: none"> a) Roosts will need to be correctly characterised by species (for example through DNA analysis); b) Confirmation of the roost types and mitigation for each will be necessary. c) The different requirements of transitional as opposed to night feeding roosts need to be considered; d) To avoid the hibernation period, we would expect no works between November and mid-March; e) Baseline environmental conditions of the confirmed roosts should be obtained, so they can be replicated within the new provisions; f) Monitoring on the compensatory habitat will be necessary for five years, spread over a 10 year period. It is important that evidence is provided that bats use the new structures, and if not, that they are modified to ensure their suitability. <p>3.5.2 Natural England has advised the applicant to submit a draft licence application, incorporating the comments made, following the hibernation surveys that are being carried out this winter. Once a satisfactory draft licence has been received, Natural England will issue a Letter of No Impediment.</p>	<p>Noted. The Applicant intends to provide NE with a draft licence application, incorporating their recommendations (though not baseline environmental conditions of all confirmed roosts will be available at the time of the draft licence submission).</p>

<p>3.6.1 Natural England's view is that the conclusion of no adverse effect on integrity of European sites is premature for a number of reasons:</p> <ul style="list-style-type: none"> • Potential loss of functionally linked land for golden plovers due to bird scaring - confirmation is required on the proportion of functionally linked land that would be lost; any reason why not all of the land within the 1km buffer would be suitable for golden plovers (eg fields are too small); and the crop rotation within the 1km buffer (ie how often the land would be suitable for golden plovers). • Potential operational disturbance to golden plovers, turnstones and little terns (and SSSI waders) from aircraft "therefore, we request predicted noise contour maps (for both peak LAmax and continuous LAeq noise levels) showing contours in 5dB increments from 55dB upwards. This should then be compared to existing noise contour maps, and overlain with the designated site boundaries and key bird locations, to assess the change in the noise environment of the SPA. • Potential surface water quality impacts - Confirmation of the designated sites and interest features that have the potential to be affected by works to the surface water outfall is required. Natural England also requests confirmation that the SuDS proposed will be sufficient to address the specific pollutants arising from the airport, and monitoring of the efficacy of the SuDS. <p>Air quality - Annual mean NOx for all years tested will be over level of "insignificance" for some of the receptors for European sites from both localised airport impacts and from increased NOx on roads further away from the application site. Some (but not all) of these annual mean NOx impacts have been subject to further assessment in Chapter 7 [APP-033]. However Chapter 7, Section 10 assessment of air quality impacts on designated sites needs to be completely revisited to address the comments set out in section 5.4 of this letter.</p>	<p>See above responses.</p> <p>Surface water quality impacts. See previous response. The discharge will be subject to approval by the Environment Agency.</p>
<p>3.6.2 Regarding protected species, Natural England has provided the applicant detailed comments on their Mitigation and Habitat Creation Plan for bats. Once we receive a satisfactory draft licence application, we will issue a Letter of No Impediment.</p>	<p>The applicant will provide a draft licence application for comment from NE.</p>

1.2 Environment Agency [\[REP3-217\]](#)

The EA's written representation comments on three main issues: requirements, the submitted Environmental Statement and the need for additional authorisations. The Applicant's response to these issues is set out in the following table.

Issue raised	Applicant's response
<p>In our Relevant Representation we outlined changes and additions required to Requirement 7 (operation environmental management plan) and Requirement 11 (contaminated land and groundwater) as set out in Schedule 2 of the Draft Development Consent Order [...]</p> <p>We are satisfied that the Applicant has agreed to make these changes and additions.</p> <p>We can also confirm that we agree with the following Requirements as currently drafted:</p> <p>Requirement 5 (detailed design of fuel depot) Requirement 6 (construction environmental management plan) Requirement 13 (surface and foul water drainage) Requirement 15 (piling and other intrusive works)</p> <p>As proposed at the Issue Specific Hearing on 10 January 2019 we request to be consulted as part of the approvals process for Requirements 6 (CEMP) and 7 (OEMP).</p>	<p>The Applicant is grateful for confirmation that Requirements 5,6,13 and 15 and the Changes to Requirements 7 and 11 are acceptable.</p> <p>The revised draft Development Consent Order, submitted to the ExA at Deadline 3 (Document REP3-186) now also includes the EA as a consultee in Requirements 6 and 7.</p>
<p>We accept that the relevant chapters in the ERS covering drainage, groundwater protection and land quality cover the issues we have raised in discussion with the applicant to date in a satisfactory manner for this stage of development.</p>	<p>The Applicant welcomes the EA's comments and is grateful to the EA for the ongoing engagement between the parties.</p>

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<p>The applicant may need appropriate authorisations from us in the form of an environmental permit or exemption for the waste activities proposed. We recommend 'twin tracking' of the DCO and permitting process to ensure the two regulatory regimes do not overlap or contradict each other. We recommend that the applicant should contact our East Kent Waste Team to discuss their plans on 0208 47 47 450 or via email at KSLEastKentWasteTeam@environment-agency.gov.uk as soon as possible.</p>	<p>The Applicant is aware that additional authorisations may be required and is grateful to the EA for providing the relevant contact details of the East Kent Waste Team.</p>
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1.3 Kent County Council [\[REP3-137\]](#)

Issue raised	Applicant's Response
<p>The issues raised in the County Council's Relevant Representation remain pertinent and the County Council, as the Local Highway Authority for Kent, would refer to its LIR and the KCC response to the Examining Authority's Written Questions for full detailed comments</p>	<p>Noted.</p>
<p>At this stage, and as set out in KCC's Relevant Representation, the transport modelling within the Transport Assessment is not considered to adequately assess future traffic conditions in line with expected growth patterns and infrastructure delivery.</p>	<p>The Applicant is undertaking further modelling work of the proposed Airport development traffic impact based on the Thanet Strategic Transport Model (TSTM). This model includes the Local Plan allocations and the Thanet Transport Strategy interventions.</p>

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Issue raised	Applicant's Response
	<p>The Transport Assessment [APP-060 and APP-061] submitted in support of the DCO allowed for the emerging Thanet Local Plan growth within the Temprow growth factors applied.</p> <p>The revised Transport Assessment is based on the results of the TSTM which includes the traffic generation from the allocated sites within the emerging Thanet Local Plan. In consultation and agreement with KCC, further growth has been added to allow for the full build out of the Development to 2039 beyond the Local Plan and TSTM extent of 2031. The growth has been based on Temprow growth factors.</p>
<p>As set in KCC's LIR, it is considered that the site and junction specific approach to capacity assessment taken in the Transport Assessment has been shown to be inappropriate, resulting in highway mitigation proposals that do not align with, or incorporate the robust, long-term solutions proposed in the Thanet Transport Strategy. The submitted Local Plan growth includes plans for several new highway links and improvements in the locality; therefore, the Kent County Council Strategic Highway Model is considered to be the appropriate tool for assessing the future impact of the proposed development.</p>	<p>In the post DCO submission period the Applicant has been engaged with KCC Highway and Transportation to undertake modelling of the Development using the TSTM when it became available for third party use in November 2018. The Applicant commissioned KCC's consultant, Amey, to undertake the modelling work which was completed in December 2018.</p> <p>The Applicant intends to produce a revised Transport Assessment which incorporates the results of the TSTM modelling work by Deadline 5.</p>

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Issue raised	Applicant's Response
<p>KCC, as Local Highway Authority, has safety concerns with a number of mitigation measures and is concerned that the development would give rise to on-street parking on the surrounding highway network.</p>	<p>Stage 1 Road Safety Audits will be undertaken of the proposed access junctions and the proposed mitigation and improvements at offsite junctions and road links.</p>
<p>It is also noted that Highways England has raised concern regarding the impact of the development on the Strategic Road Network. The efficient and reliable operation of the Strategic Road Network is important to that of the local highway network in East Kent, due to the interface between them and as such, it is essential that the impacts on both networks are adequately assessed and mitigated.</p>	<p>The Applicant has been engaged with KCC Highway and Transportation with agreement on the modelling of the Proposed Development traffic using the Thanet Strategic Traffic Model (TSTM).</p>
<p>The County Council, as Local Highway Authority, has been in constant dialogue with the applicant since the submission of the DCO and will continue to actively engage with the applicant with a view to resolving the above matters.</p>	<p>Noted.</p>
<p>The County Council's full comments relating to PRoW are set out within the KCC response to the Examining Authority's Written Questions.</p>	<p>Noted.</p>

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Issue raised	Applicant's Response
<p>It is understood that the PRoW TR8 will be rerouted along the edge of the new proposed perimeter fence of the airport, with the previous route permanently closed and a new route permanently established. It is requested that contact is made with the KCC PRoW and Access Service at the applicant's earliest convenience, to discuss any required route diversions.</p>	<p>Noted. Please refer the Applicant's comments on KCC's response to the ExA's FWQs in relation to this matter.</p>
<p>In respect of ongoing maintenance, it will be expected that the site operators will take on ongoing maintenance responsibilities for any landscaping and enhancements along the bridleway and PRoW network.</p>	<p>Ongoing maintenance of PRoWs is expected to form part of the Section 106 Agreement with KCC.</p>
<p>The County Council would expect monies to be secured to improve the surface of the existing and diverted bridleways to a minimum width of 3m along the entire length, which will include bridleways TR8 and TR10.</p>	<p>The PRoW Management Strategy (PRoWMS) [APP-073] appended to the Transport Assessment [APP-060/061] submitted in support of the DCO submission considered TR8 and TR9 in consultation with the KCC PRoW Officer. The PRoWMS included proposals to improve TR8 to a 3m width.</p> <p>TR10 was not identified as an affected route.</p>

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Issue raised	Applicant's Response
	Ongoing maintenance of PRowS is expected to form part of the Section 106 Agreement with KCC.
<p>The applicant's PRow Management Strategy states that a new link from bridleway TR9 to the proposed Thanet Parkway Station across the site or around the edge of the site cannot be provided as part of this development proposal. However, the County Council requests that the additional connection to Thanet Parkway is still considered by the applicant, as this will greatly benefit the connectivity of the site and will further increase opportunities available to the local community for recreation, active travel and exercise.</p>	<p>The Applicant notes these comments and will further consider the PRow Strategy, consulting with the KCC PRow and Access Service as part of the ongoing process of agreeing the SoCG.</p>
<p>Full comments on matters of heritage conservation are provided within KCC's LIR and the response to the Examining Authority's Written Questions, which set out the present position in respect to the issues raised in the Relevant Representation around archaeology and built heritage within the application site.</p>	<p>Noted.</p>
<p>The County Council notes there is a draft requirement (16) that looks to deal with archaeological remains and the LIR provides comments on this requirement and its suggestions on what the Written Scheme of Investigation should include.</p>	<p>Noted.</p>

Manston Airport DCO – Comments on Written Representations

Issue raised	Applicant's Response
<p>Whilst KCC has no statutory responsibility for aviation noise, a great deal of knowledge and experience has been amassed, particularly in relation to the arriving aircraft over West Kent destined for Gatwick Airport. The County Council provides its full comments on aviation noise within the LIR and in response to the Examining Authority's Written Questions.</p>	<p>Noted.</p>
<p>The Environmental Statement has taken a robust assessment of the likely impacts of operational aviation noise, taking a conservative figure for the Lowest Observed Adverse Effect Level (LOAEL) and conforming to Government policy and guidance from the World Health Organisation and others. This has demonstrated that a number of residential dwellings will be exposed to significant adverse effects, defined as a perceptible change in quality of life.</p> <p>It is vital that an appropriate level of mitigation is offered in terms of insulation and relocation assistance, as well as community involvement in airspace design - including potential for respite, restrictions in night flights and runway preferencing in low wind conditions. Communities affected must know what to expect from a reopened airport in terms of noise impacts, because unexpected noise impacts are more noticeable and cause greater disturbance.</p>	<p>It is agreed that communities affected by the reopened airport cannot be assumed to be used to aviation noise from Manston Airport, and for that reason the Noise and Vibration assessment presented in Chapter 12 of the ES [APP-034] assumes a situation with no baseline level of noise from Manston Airport.</p> <p>The Noise and Vibration assessment presented in Chapter 12 of the ES [APP-034] is based on a reasonable worst-case scenario, including when the airport is operating at the maximum forecast capacity in Year 20. This forecast manages the expectations of the community in relation to noise and how it may change over years of operation.</p> <p>Noise mitigation for communities</p>

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Issue raised	Applicant's Response
	<p>To manage noise impacts on the community, the Applicant has committed to providing insulation and relocation schemes:</p> <p>The Noise Mitigation Plan [APP-009] commits to providing a noise insulation scheme to residential properties exposed to aircraft noise levels in excess of 63 dB LAeq,16hr (daytime) and / or 55 dB LAeq, 8hr (night time); and</p> <p>In line with Government guidance, a relocation assistance scheme will be offered by the airport authority to enable those homeowners exposed to the highest levels of airport related noise to move away from the Proposed Development. The dwelling relocation assistance will be offered if residents are exposed to unacceptable adverse effects on their health and quality of life. Eligibility will be based upon a dwelling lying within the daytime 69 dB LAeq,16hr contour. If eligible, homeowners will be provided with assistance with the costs of moving away from the Proposed Development.</p> <p>Community engagement</p> <p>The Applicant proposes ongoing engagement with stakeholders including local community representatives through an Airport Consultative Committee which will be secured through a requirement in the DCO. The Consultative Committee will be consistent with the Department for Transport Guidelines for Airport Consultative</p>

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Issue raised	Applicant's Response
	Committees 2014, including the third Category of Section 35 of The Civil Aviation Act 1982 (as amended) and relevant representation from organisations representing the interests of communities surrounding the airport.
<p>Further to KCC's previous comments, it is noted that there are a number of outstanding ecological surveys for bats, reptiles, breeding birds (including barn owls) and invertebrates. The County Council would expect that all ecological surveys are undertaken to fully inform any proposed mitigation or compensation measures. The proposed likely mitigation requirements (based on worse case scenarios) are extensive and robust. The County Council would raise concern around the deliverability of any off-site compensation measures for breeding birds and would expect to see further information demonstrating that the proposed measures are deliverable.</p>	<p>The habitat creation proposed in Appendix 7.13 [APP-044] is based upon the worst-case assessment. Surveys conducted over 2019 will confirm the extent of mitigation required although the baseline survey findings collected by Stonehill Park indicate that the worst case has overestimated the status of receptors on Site. The ES [APP-033] details further surveys at 7.3.12.</p>
<p>As previously indicated in the Relevant Representations response, KCC was engaged in pre-application discussions with the applicant and the outputs are captured within the Flood Risk Assessment.</p>	<p>Noted.</p>

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Issue raised	Applicant's Response
<p>It is noted that attention has been paid to the operation of the drainage system, including the two attenuation basins for water quality control reasons. KCC would highlight that these basins will need to operate to manage surface water in the event of extreme rainfall, and consideration must be given to adequate sizing and operations of the drainage system including the network, basins and associated pump, so that local flood risk is not created. This matter does not appear to be captured and should be considered.</p>	<p>The outline drainage design incorporates an allowance for extreme rainfall with climate change. The detailed drainage design will include further consideration of these elements.</p>
<p>The draft Development Consent Order does not include provision for KCC as Lead Local Flood Authority to be part of the review and consultation process in relation to surface water drainage (Surface and Foul Drainage, paragraph 13 of Schedule 2). It is requested that this is amended accordingly.</p>	<p>The Applicant will make the requested amendment to the revised dDCO to be submitted at Deadline 5.</p>
<p>It should be noted that KCC is the statutory consultee for surface water drainage under the terms of the Town and Country Planning (Development Management Procedure) Order 2015 and surface water is not within the EA remit.</p>	<p>Noted.</p>

1.4 Dover District Council [[REP3-220](#)]

Issue raised	Applicant's Response
<p>The District Council supports the Applicant's commitment to work closely with local councils to help to promote job opportunities for local people and wishes to build on this to ensure that the development of skills is supported to help deliver East Kent priorities.</p> <p>Since the commencement of the examination process, further engagement has been undertaken regarding the scope of work anticipated to ensure that the economic benefits of the proposed development for East Kent can be realised.</p> <p>With regard to the forecast generation of 2,655 jobs and 30,000 jobs by years 2 and 20 respectively, DDC notes the submission of the Employment Land and Housing Technical Report (Document 7.2: Planning Statement) and would welcome the opportunity to work closely with the Applicant and the relevant neighbouring authorities in assessing the implications of project employment growth on development requirements for East Kent.</p> <p>Matters regarding the socio-economic benefits of the proposed development on the local economy and wider East Kent economy are set out in the draft Statement of Common Ground between DDC and RSP submitted at Deadline 3.</p>	<p>Noted.</p>
<p>DDC relies on the expertise of KCC as Local Highway Authority' in assessing the impacts of the proposed development on the strategic highway network and the identification of associated mitigation measures.</p>	<p>Noted.</p>
<p>The District Council concurs with the proposed sensitivity assessment for Landscape Character Areas within its administrative boundary as set out in the Environmental Statement (Document 5.2-2).</p> <p>With regard to the height of structures proposed as part of the development proposal (e.g. new Air Traffic Control facilities at 27m,</p>	<p>A SoCG with DDC has now been agreed however, the Applicant will continue to engage with DDC in relation to this matter.</p>

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Issue raised	Applicant's Response
<p>cargo facilities at 20m and aircraft recycling hangars at 23m), DDC wishes to further engage with the Applicant as the DCO process advances to assess the landscape and visual impact of the proposals and alternatives from receptors located in the Dover District and to identify any mitigation measures, where required.</p> <p>To date, there has been no further correspondence on this matter beyond the formal consultation process, as set out in the draft Statement of Common Ground between DDC and RSP submitted at Deadline 3.</p>	
<p>Adverse noise effects have been identified in 5 locations including West Stourmouth (located in the Dover District) where noise would increase to a point where there would be a perceived change in quality of life.</p> <p>Matters regarding noise impacts of the proposed development on the Dover District are set out in the draft Statement of Common Ground between DDC and RSP submitted at Deadline 3.</p>	<p>The SoCG between the Applicant and DDC has now been agreed.</p>
<p>DDC relies on the expertise of KCC Ecology, Natural England and the Environment Agency in assessing the ecological impacts of the proposed development on designated sites.</p>	<p>Noted.</p>
<p>DDC relies on the expertise of Historic England and KCC Heritage Conservation to assess the potential impact of the proposed development on the historic environment.</p>	<p>Noted.</p>

1.5 Thanet District Council [\[REP3-010\]](#)

Manston Airport DCO – Comments on Written Representations

Issue raised	Applicant's Response
<p>The development of Manston Airport will bring direct and indirect employment to the local area and we welcome the potential local training opportunities that the project would bring. We will work with the applicant to secure these through a legal obligation under Section 106 of the Planning Act.</p>	<p>Agreed.</p> <p>Socio-economic impact upon employment as a result of the Proposed Development is considered within Chapter 13 of the Environmental Statement [APP-034], paragraphs 13.8.1 - 13.8.59; direct employment will be of major beneficial significance during construction and operation, with further indirect and induced employment opportunities. It has been assessed that the development will produce 23,235 employment opportunities by year 20 (E&S 2017).</p>
<p>It is important for the proposal to provide the required infrastructure to support the full extent of the masterplan for the site, whilst coordinating with the Thanet Transport Strategy which supports the new Thanet Local Plan deposited with the Planning Inspectorate. This includes the provision of the Manston to Haine road link within the northern section of the site, required for the road network to support both the development of the site and the Local Plan until 2031.</p>	<p>Alongside the revised modelling that is being undertaken to address KCC comments on the existing DCO TA submission, work is also ongoing to address the issues related to the potential Manston to Haine Link Road across the Northern Grass Area.</p> <p>At this stage it is not proposed to provide this link due to a number of operational issues for the Northern Grass Area site, the details of which are being provided to KCC and are the subject to ongoing discussions.</p> <p>However, as part of the revised modelling using the TDSM, a scenario has been included which would model a new alignment of the link that utilises the Manston Road corridor before routing east across Agricultural land to Manston Court Road. This would involve the use of some of the Northern Grass Area along the western</p>

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Issue raised	Applicant's Response
	<p>periphery but would not route through site and would also provide the Manston to Haine link as set out in the Local Plan.</p> <p>With this modelling undertaken and a potential alternative alignment agreed (including junction from at Manston Road/Spitfire Way), the issues raised in this comment would be addressed.</p>
<p>A functioning cargo airport will cause an impact on the living conditions of some residents in the district and it is vital that the project provides adequate mitigation to those affected by aircraft noise. The council will analyse the mitigation proposed by the applicant within out LIR.</p>	<p>To address aircraft noise, the Applicant has developed a series of commitments to limit noise in its Noise Mitigation Plan [APP-009].</p> <p>The Noise Mitigation Plan is intended to address the effects of noise from airport when at its full operating year.</p> <p>A Noise Mitigation Plan has been submitted as part of the application and an updated version is submitted at Deadline 4.</p>

1.6 Historic England [[REP3-162](#)]

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Issue raised	Applicant's response
<p>1.1 The proposed development lies within a very rich archaeological landscape and there is therefore great potential for important remains to be discovered there. The development site also contains the remains of an historic airfield and important historic aviation buildings. The open grassland character of much of the airfield evokes its wartime use. There are no designated heritage assets within the proposed development site at the present time; however we think that further heritage assessment work might reveal heritage assets of great, perhaps national, importance.</p> <p>1.2 There is inadequate understanding of the archaeological significance of the North Grass Area and some areas of the proposed airside development, the heritage significance of historic buildings and the historic landscape character of the airfield to make properly informed decisions about the proposed development.</p> <p>1.3 In the Environmental Statement (ES) an adequate "worst-case" impact assessment of buried archaeological remains has been undertaken; however, historic buildings and the historic landscape</p>	<p>This points are addressed below.</p>

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<p>character of the airfield have not been adequately assessed in the same way.</p> <p>1.4 In view of the inadequate heritage assessment and impact assessment Historic England thinks that the applicant should provide sufficient flexibility in the scheme quantum and design to preserve nationally important heritage assets, should they be identified, in compliance with the requirements of the Airports National Policy Statement (ANPS).</p> <p>1.5 We suggest that consideration is given to amending some of the draft Development Consent Order (DCO) Requirements, and creating some additional Requirements, in order to secure appropriate treatment of heritage assets in the proposed scheme.</p>	
<p>3.1 The proposed development lies within a very rich archaeological landscape, in which numerous designated and non-designated archaeological sites of national importance have been located. Prehistoric remains include ritual monuments, for example Bronze Age barrows and Roman and Saxon cemeteries. There are also Iron Age, Roman and medieval settlements and their associated landscapes present. Typically, these archaeological sites exist as buried rather than upstanding remains. The airfield has its origins in the First World War, although it expanded in the Second World War, and once occupied a greater area than the present airport. There are significant historic buildings relating to aviation and anti-invasion defence on the</p>	<p>An evaluation of undesignated heritage assets within the proposed development site and the potential for harm to be caused to these features was submitted at Deadline 3.</p>

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<p>proposed development site and near to it. The open grassland character of much of the airfield evokes its wartime use.</p> <p>3.2 There are no designated heritage assets within the proposed development site at the present time; however we think that further heritage assessment work might reveal heritage assets that have a level of importance equivalent to designated heritage assets such as listed buildings or scheduled monuments, which is one of the main reasons that Historic England has made representations about this application.</p>	
<p>4.1.1. For a project of this size and complexity we would expect provision to be made for a programme of archaeological evaluation tailored to assess the effects of the proposal on archaeological remains. This would usually entail geophysical survey and trial trenching. Subsequent work might also be necessary to mitigate the impacts of the development.</p> <p>4.1.2. Some heritage assessment of the proposed development site has been undertaken by others, such as the advocates of housing development on the airfield (Stonehill Park - Thanet Planning Application Ref OL/TH/16/0550); however this assessment does not provide complete coverage of the application site and neither is it in sufficient depth in some respects (see below). The lack of information about the character, extent and importance of archaeological remains, historic</p>	<p>The masterplan presents indicative development proposals for the Northern Grass. Detailed design will have regard to the results of archaeological investigation of this area. The draft DCO sets out clear and enforceable proposals for the protection of archaeological remains which are of demonstrable national significance. Preservation in situ could be achieved through modifying the location and extent of planned structures and services, by adopting engineering techniques that minimise ground disturbance, or by a combination of both approaches.</p> <p>A written scheme of archaeological investigation is submitted at Deadline 4 which sets out detailed proposals for further archaeological work to support the proposed DCO requirement.</p>

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<p>buildings and the historic landscape character of the airfield is a key unresolved issue.</p> <p>4.1.3. River Oak have notified us that have not been able to gain access to the site to undertake their own surveys so they have had to depend on those undertaken by others, such those by Stonehill Park; however these only covered the southern and central part of the site (with some exceptions) and not the North Grass Area. More recent geophysical survey of the North Grass Area for the Stonehill proposal has not yet been released into the public domain.</p> <p>4.1.4. Therefore, although the applicant might be able to explain why surveys have not been undertaken the fact remains that there is inadequate understanding of the archaeological significance of the North Grass Area and some areas of the proposed airside development to make informed decisions about the proposed development.</p>	
<p>4.2.1. For a project of this size and complexity we would expect a programme of historic building survey to record and analyse the heritage significance of historic buildings in order to inform decisions about whether they warrant preservation and re-use or whether their demolition would be justified.</p>	<p>The most visible and evocative historic building within the site, the former RAF Manston Control Tower, is located within the museums safeguarding area and will be retained. Similarly, the former RAF Battle Headquarters would be retained within the Museums area and the former ROC monitoring post would also be retained. Initial appraisal of the other historic buildings within the site from existing sources suggests that they are of limited architectural and historic interest, representing standardised designs which have mostly been extensively modified since</p>

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4.2.2. An overview of historic buildings was commissioned by Kent County Council in 2016 (Survey Of Buildings And Structures Associated With Manston Airport And The Surrounding Areas, Richard Taylor & Victor Smith, 2016) but it was not a detailed account of the buildings. The applicant has apparently not had access to the site in order to undertake more detailed surveys.

4.2.3. There is some acknowledgement in the ES that further survey would be appropriate in order to determine the heritage significance of historic buildings. For example, in paragraph 9.9.6 it says that the RAF Manston WWII Battle HQ would merit a special recording effort, although to this we would add the T2 Hangar, WWII Dispersal Bay and the RAF Manston Control Tower. In paragraph 9.9.3 the ES says that further survey may identify that some assets would be suitable for designation as Listed Buildings.

4.2.4. Therefore, again, while the applicant might be able to explain why surveys have not been undertaken the fact remains that the understanding of historic buildings is inadequate to make properly informed decisions about the proposed development.

construction. It does not appear likely that any of these buildings meet the tests set out in the HE Designation Guide to be considered for designation.

A written scheme of archaeological investigation is provided at Deadline 4 and sets out detailed proposals for further archaeological buildings recording.

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<p>4.3.1. We think that the airfield itself has some heritage significance that arises from its historic landscape character, which enables understanding and appreciation of its wartime use. In particular, the open grassland character of much of the airfield evokes its wartime use. Furthermore, we think that the airfield contributes to the heritage significance of the wartime buildings, the museums and the memorial garden. Together these features create a sense of place.</p> <p>4.3.2. The historic character of the airfield has been given some attention in the ES (9.4.43 and 9.4.51) but it is insufficiently detailed to adequately inform decisions about whether to retain open space and views across the grass airfield or views between historic buildings. We understand that the applicant does not propose to undertake any further assessment of the historic landscape character of the airfield.</p>	<p>The value of the historic character of the airfield is limited. The site is not covered by any historic conservation designations, and Historic England have carried out a national thematic survey of historically significant airfields, which has not identified Manston as of elevated significance. The airfield layout reflects a series of incremental changes to the airfield through its wartime and post-war use and has become perceptually and functionally fragmented.</p> <p>The Museums and Memorial Garden would be retained in their present sites, retaining their connection to the historic use of the airfield. The proposed development would retain an open character around the runway and reflects the historic and functional layout of the post-war airport. The proposed development would bring the core of the airport into single ownership, reducing further fragmentation, and would restore the site to active aviation use, contributing positively to historic character.</p>
<p>5.1.1. We acknowledge that the ANPS allows that, where details are still to be finalised, such as in respect of the phasing of the development and operational changes at the airport, the applicant may set out instead design parameters and use these to initially assess the likely impacts of the proposed development (4.16-4.18). We understand that where it has not been possible to undertake adequate surveys to assess heritage significance, it may be possible to set out design parameters and adopt a "Rochdale Envelope" approach to assessing impacts. However while a "worst-case scenario" has been identified with respect to buried archaeological remains (see s.9.8.5-9.8.10 of the ES), we think this is</p>	<p>The responses to the ExA's written questions have clarified which historic buildings will be retained and how historic character has been addressed in design. Principles for detailed design will be set out in the draft Design Guide, and the response to the ExA's First Written Questions included a clear discussion of the benefits of the proposed development, including consideration of the heritage assets within the site.</p> <p>The draft DCO sets out clear and enforceable proposals for the protection of archaeological remains which are of demonstrable national significance. Preservation in situ could be achieved through modifying the location and extent of</p>

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<p>not the case with respect to the historic buildings and historic landscape character of the airfield.</p> <p>5.1.2. Paragraph 5.191 of the ANPS says that if non-designated heritage assets of archaeological interest are demonstrably of equivalent significance to scheduled monuments they should be considered subject to the more demanding policies that relate to designated heritage assets. In particular, if archaeological remains are found to be of national importance: great weight should be attached to their conservation; any harm would require clear and convincing justification; less than substantial harm must be weighed against public benefits; and substantial harm should be exceptional and only justified where outweighed by substantial public benefits. In this case it might be appropriate to preserve in situ the asset, in which case this should be provided for in the Master Plan.</p> <p>5.1.3. Given the potential for nationally important archaeological remains we think that the applicant should provide sufficient flexibility in the scheme quantum and design for any such assets that may be discovered during the course of future surveys to be preserved as part of the scheme; however we don't think that the applicant has adequately done this in the ES.</p> <p>5.1.4. The applicant has proposed to undertake "best endeavours" to avoid harm to heritage significance; however, they have formulated a methodology for how this might be achieved as a hierarchy of possible</p>	<p>planned structures and services, by adopting engineering techniques that minimise ground disturbance, or by a combination of both approaches.</p> <p>At this stage, it is not considered that it would be either appropriate or possible to model conjectural changes to the proposed development based on the presence of hypothetical archaeological remains within the Northern Grass. The flexibility inherent in the parameter approach means that the proposed DCO requirement would ensure that any archaeological remains of equivalent significance to scheduled monuments which may be identified could be effectively protected within the proposed development.</p>
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action (from avoidance as the first option to archaeological excavation as the last), which is inappropriate in our view as the lower tiers of the hierarchy are mitigation techniques that would not avoid harm. Therefore the hierarchy would be a dilution of the commitment to undertake best endeavours to avoid harm.

5.1.5. Paragraph 5.192 of the ANPS says that the Secretary of State will also consider the impacts on other non-designated heritage assets on the basis of clear evidence that the assets have a significance that merits consideration in that decision, even though those assets are of lesser value than designated heritage assets. In this case such heritage assets would include archaeological remains that are shown to be of less than national significance, historic buildings that are not listed and historic landscape character. For the Secretary of State to make an informed decision in such circumstances sufficient survey and assessment is required to enable a judgement to be made about whether there is clear evidence of the significance of heritage assets. In our view there could be circumstances in which it would be appropriate to preserve historic buildings and historic landscape character when they are shown to have considerable heritage significance.

5.1.6. In paragraph 5.195 of the ANPS the applicant is encouraged to prepare proposals that can make a positive contribution to the historic environment, and to consider how their scheme takes account of the significance of the heritage assets it affects. It says that this can include enhancing heritage assets and their settings, reducing risk to heritage assets, and considering visual or noise impacts and opportunities to

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<p>enhance access to, or appreciation of, the heritage assets affected by the scheme.</p>	
<p>5.2.1. The Project Description Chapter of the ES sets out the maximum parameters for the Northern Grass in sections 3.3.93 - 3.3.102. When compared to the "worst-case" assessment of archaeological potential (s.9.8.5 - 9.8.10) a worst-case assessment of impact is possible in general terms. The ES indicates that the North Grass Area would be densely developed with large structures, which we presume would require deep and extensive foundations and services. We think that any buried archaeological remains in these areas would be harmed by ground works, and that the greater the range and depth of these foundations and services, the more likely it will be that archaeological remains would be severely damaged or destroyed.</p> <p>5.2.2. The ES says "Key to archaeological mitigation is the inherent flexibility offered in the zonal approach adopted for Masterplan preparation, together with a structured post-consent delivery process for generating informed development and archaeological mitigation proposals" (s.9.8.13); however no information is given about the zonal approach or how it would allow impacts to be avoided so it is hard to see how the requirements of the ANPS (s.5.191) could be met.</p>	<p>The masterplan presents indicative development proposals for the Northern Grass. Detailed design will have regard to the results of archaeological investigation of this area. The draft DCO sets out clear and enforceable proposals for the protection of archaeological remains which are of demonstrable national significance. Preservation in situ could be achieved through modifying the location and extent of planned structures and services, by adopting engineering techniques that minimise ground disturbance, or by a combination of both approaches.</p>
<p>5.3.1. The proposed development seems to require the alteration, movement or removal of some or all of the historic buildings and structures on the site, which we think would be harmful to their</p>	<p>The answers to the ExA's First Written Questions, particularly HE.1.20, set out in some detail which buildings would be retained in the proposed development. These</p>

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<p>significance. The ES recognises "a high magnitude of change on some buildings" (s.9.9.6) but it is not clear which buildings would be removed and which could be retained.</p> <p>5.3.2. We note that the ES says that further investigation and assessment of these structures is required to ascertain their current condition, desirability and feasibility for incorporation as a sustainable asset in the final design, and that the adoption of an agreed scheme of building recording and a degree of flexibility within master planning proposals would potentially allow significant adverse effects to be avoided. However, it goes on to say that the amount of design flexibility needed to ensure that impacts could be avoided is not practicable in all cases, and in the worst-case scenario mitigation (and presumably avoidance of harm too) has been disregarded (s.9.9.6). In our view this is highly problematic because we think that some of the historic buildings could be of national importance and so enough flexibility should be retained to provide for their preservation in order to comply with the requirements of the ANPS (s.5.192 and 5.195).</p> <p>5.3.3. On the basis of the initial historic buildings survey that has already been done we think that some buildings are more likely than others to warrant preservation; in particular the T2 Hangar, WWII Dispersal Bay, RAF Manston Control Tower and the RAF Manston WWII Battle HQ are likely to merit consideration in the Secretary of State's decision (ANPS 5.192 and 5.195). We think further survey and assessment is needed to properly understand their significance, and the quantum and design of the development should be sufficiently flexible to allow for their</p>	<p>buildings represent the most recognisable or unusual survivals of the military use of the airfield.</p>
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<p>preservation and sustainable use within the development scheme, should further assessment confirm that this is warranted.</p> <p>5.3.4. Historic buildings that are retained may have their heritage significance harmed by change to their settings caused by the construction of large new buildings so provision should also be made to protect the settings of retained historic buildings where this contributes to their heritage significance, for example, views between contemporary buildings and airfield features, such as runways.</p>	
<p>5.4.1. The proposed new buildings would greatly alter the open grassland character of the site, which would severely damage or destroy the historic landscape character of the airfield. However, we think that the ES does not adequately describe the historic character of the airfield or the effect of the development on it. The ES says that the proposed design scheme has regard to the historic airfield character (s.9.9.5) but there is no assessment of how the airside development would affect the setting of historic buildings except to say that "views will be obscured by the cargo terminal intervening in views to the runway" (s.9.9.5). The ES also acknowledges that the Northern Grass area would also be significantly changed by substantial buildings, which would block views over the open grassland, which was historically part of the airfield (s.9.9.5).</p> <p>5.4.2. The only mitigation of the impacts on the historic character of the airfield is the retention of "historic connections through aspects such as</p>	<p>The Environmental Statement sets out the generalised design response to the historic character of the airfield. This comprises the retention of the functional layout of the airfield, the continuing aviation use of the airfield and the retention of the airfield in single ownership. In addition, the museums safeguarded area would allow the existing museums and memorial provision to be retained. Larger open areas would be retained within the development around the runway and within the radar safeguarded area, with landscape treatment of the boundaries of the Northern Grass allowing a transition between the operational areas of the airfield and the Northern Grass. A design guide has been provided at Deadline 4 (TR020002/D4/DG) and sets out measures by which the historic airfield use can be reflected in the built environment of the proposed development.</p>

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<p>street and building names, and an Airport Consultative Committee will be set up"• (s.9.9.5) but we think this is inadequate. In our view the historic landscape character of the airfield is likely to have a heritage significance that merits consideration in a decision (ANPS 5.192 and 5.195). We think further survey and assessment of historic landscape character is needed to properly understand its significance and, if it is shown to have considerable heritage significance, that provision be made to preserve some open grassland of the airfield within the development.</p>	
<p>5.5.1. Historic building beyond the development area may also have their heritage significance harmed by change to their settings, particularly by operational aircraft noise. Historic England agrees that the assessment of noise effects used by River Oak for the purposes of the ES was appropriate. The assessment had regard to appropriate guidance (The Aviation Noise Metric - Research on the Potential Noise Impacts on the Historic Environment by Proposals for Airport Expansion in England; and Good Practice Advice in Planning Note 3).</p> <p>5.5.2. Scoping for aviation noise impacts initially used a contour that mapped the frequency of maximum noise exceeding a 60dB threshold (N60) and then the sensitivity of the heritage significance of the asset to noise was assessed (see the ES 9.6.20-9.6.28). Assets which may be sensitive to noise for reasons other than heritage significance, such as residential properties, are assessed within the assessment of operational noise in Chapter 12 of the ES.</p>	<p>Noted.</p>

5.5.3. We broadly agree with the assessment of the effects of change in Table 9.15 of the ES. There will be some harm to some Listed Buildings as a result of increases in aircraft noise; in particular Cleve Court and Cleve Lodge, Way House and Wayborough House will suffer "significant effects" according to the ES, which we assume will be "less than substantial harm" in the terms of the ANPS. The harm should be reduced as far as possible but it seems possible that residual harm to these heritage assets will remain after mitigation.

5.5.4. There are two Scheduled Monuments in close proximity to the proposed development: the enclosure and ring ditches sited 180m east- northeast of Minster Laundry and the Anglo-Saxon cemetery south of Ozengell Grange. The Scheduled Monuments have national importance but we think that their importance derives principally from their evidential value (i.e. the archaeological potential of buried deposits within their boundary); we do not think that they gain much of their significance from characteristics of their settings (i.e. there is little in their settings that contributes to the understanding and appreciation of their heritage significance). Therefore, while there is a large magnitude of change within the setting of the scheduled monuments the setting contributes little to their heritage significance and therefore the overall impact on the heritage significance of the scheduled monuments is minor (less than substantial harm).

5.5.5. We do not consider that the heritage significance of heritage assets in Ramsgate or any of the other conservation areas are likely to

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<p>be much harmed by operational aircraft noise. We expect that any socio-economic effects on heritage assets caused by noise would be addressed by other parts of the ES.</p>	
<p>5.6.1. The applicant has said that the scheme can be made flexible enough that harm to nationally important heritage assets could be avoided through changes to the design, such as safeguarding areas for non-harmful land-uses and preserving historic buildings and their settings. For example, paragraph 9.8.11 of the ES assumes that archaeological remains of high significance will be present at one or more locations in the North Grass Area, paragraph 9.8.13 suggests that the zonal approach adopted in the Masterplan will allow for appropriate avoidance and mitigation of impacts, and paragraph 9.8.15 says that the results of archaeological evaluation and detailed construction designs will be used to mitigate adverse effects, including by restricting development layout, design and construction processes.</p> <p>5.6.2. However, as the development zones identified on Figure 3.6 of the ES seem to have been drawn in response solely to the visual sensitivity of nearby residential property there doesn't seem to be any flexibility described that would facilitate avoidance of harm to the heritage significance of archaeological remains, historic buildings or historic landscape character. Furthermore, a promise to take archaeological remains into account during the detailed designs is not convincing provision for the preservation of a substantial archaeological site. Therefore, while the ES adopts a "worst-case scenario" approach to the</p>	<p>Requirement 16 in the dDCO [APP-006] allows for detailed archaeological investigation of the Northern Grass to identify if there are indeed any archaeological remains, their extent and nature, including the possibility of a ring ditch. A large proportion of the Northern Grass would be taken up by the museums and radar safeguarding zones, in which no construction activity is planned. The flexibility inherent in the proposals for development of the remainder of the Northern Grass would allow for the avoidance of substantial harm through the implementation of design and engineering measures that will be further defined following the pre-construction site investigations required under the relevant requirements in the dDCO.</p>

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<p>initial assessment of impacts on archaeological remains, the proposed quantum of development and design does not provide for sufficient flexibility to allow such impacts to be avoided should further assessment show it to be warranted.</p> <p>5.6.3. Similarly, there is no clear provision made, as far as we can see, for flexibility to retain and re-use historic buildings, should they be found to warrant preservation. The ES is ambiguous about which, if any, historic buildings will be preserved and whether there is any flexibility to extend preservation following historic buildings surveys. Furthermore, the ES doesn't seem to offer any provision to preserve the historic landscape character of the airfield, or flexibility to do so should it be found to be important enough to warrant it.</p>	
<p>6.1. The purpose of Historic England's comments on the DCO is to help ensure that heritage assets are appropriately safeguarded and any mitigation measures set out in the DCO appropriately address the likely impacts of the scheme. We suggest that consideration is given to amending some of the draft Requirements, and to create some additional Requirements in order to secure appropriate treatment of heritage assets in the proposed scheme. We would also note that although the lead is likely to be taken by Kent County Council in the discharge of conditions, there may be occasions where it would be appropriate for Historic England to be consulted. We comment as follows:</p>	<p>The Applicant is considering the matters raised and whether to make any amendments to the requirements in the next iteration of the dDCO.</p>

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<p>Article 6</p> <p>6.2.1. The blanket provision for lateral and vertical deviation in the locations and dimensions of new buildings and other features is not appropriate in our view. This is because the location of important archaeological remains, historic buildings, and historic landscape character could be harmed by some such deviations. However, as heritage surveys are incomplete it is not yet possible to identify places where deviations should be restricted. We suggest that an additional subsection might be added to Article 6, saying "In the light of further heritage assessment, Heritage Constraint Areas in which deviations are restricted will be identified by the applicant in consultation with Kent County Council, and if appropriate Historic England, before they are submitted to the Secretary of State for consideration."</p>	<p>The Applicant is considering the matters raised and whether to make any amendments to the requirements in the next iteration of the dDCO.</p>
<p>Schedule 1</p> <p>6.3.1. The floor area and heights of buildings (Work nos. 1, 2, 3, 4, 12, 13, 14, 15, 16, 17, 18 or 20) are of concern to us. This is because if important heritage assets that should be preserved are identified it might be necessary to reduce the quantum of and/or layout of development (see our comments in paragraphs 5.6.1 - 5.6.3). We suggest that further proposals demonstrating the scope for flexibility should be developed by the applicant in consultation with Kent County Council, and if appropriate Historic England, before it is submitted to the Secretary of State for consideration.</p>	<p>The Applicant is considering the matters raised and whether to make any amendments to the requirements in the next iteration of the dDCO.</p>

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<p>Schedule 2, Requirement 4</p> <p>6.4.1. Historic buildings and the historic character of the airfield could be harmed by the size and appearance of new buildings. We suggest that an additional subsection might be added to say that the external appearance and dimensions of any element of Works that has the potential to affect a Heritage Constraint Area (see para. 6.3.1) should be subject to consultation with Kent County Council, and if appropriate Historic England, before it is submitted to the Secretary of State for consideration.</p>	<p>The Applicant is considering the matters raised and whether to make any amendments to the requirements in the next iteration of the dDCO.</p>
<p>Schedule 2, Requirements 3, 4, 6 & 7</p> <p>6.5.1. Archaeological remains, historic buildings and the historic character of the airfield could be harmed by development. We presume that the Development Master Plan, Construction Environmental Management Plan and Operation Environmental Management Plan will be the principal guides for the implementation of works, in order to avoid unintended impacts and provide for mitigation. Therefore, provision for the investigation, safeguarding and mitigation of impacts on heritage assets should be set out in these documents and they should be subject to consultation with Kent County Council, and if appropriate Historic England, before they are submitted to the Secretary of State for consideration.</p>	<p>The Applicant is considering the matters raised and whether to make any amendments to the requirements in the next iteration of the dDCO.</p>

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<p>Schedule 2, Requirement 16</p> <p>6.6.1. We note that this Requirement refers only to archaeological recording intended to mitigate impacts on buried archaeological remains. We think that the scope of this Requirement should be widened to also include recording of historic buildings and their settings in order to mitigate impacts on those heritage assets. The scope of work should include but not be limited to: geophysical survey and archaeological evaluation trenching of the North Grass Area and un-investigated airside areas; extensive strip, map and sample of development areas; full archaeological excavation of archaeological features(where appropriate); historic building recording and analysis of historic buildings.</p>	<p>The Applicant is considering the matters raised and whether to make any amendments to the requirements in the next iteration of the dDCO.</p>
<p>Schedule 2, proposed new Requirement</p> <p>6.7.1. In some instances the preservation of important heritage assets might be appropriate but the ES provides insufficient understanding of the significance of heritage assets to properly inform a decision about when this would be appropriate. No provision is made in the Requirements for further heritage assessment that would inform the Secretary of State's decision about whether it would be appropriate to alter the quantum or design of development in order to preserve archaeological remains in situ, historic buildings, or visual character and views. Therefore we suggest that it should be required that before the Master Plan is approved the applicant should commission further heritage survey according to Written Schemes of Investigations approved by the Secretary of State in consultation with Kent County Council. The further heritage survey should include desk-based and site-based archaeological assessment, historic building recording and analysis and assessment of the historic character of the airfield.</p>	<p>The Applicant is considering the matters raised and whether to make any amendments to the requirements in the next iteration of the dDCO.</p>

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<p>Schedule 2, proposed new Requirement 6.8.1. In some instances the preservation of important heritage assets might be appropriate but the applicant has not provided sufficient information in the ES to demonstrate that there is sufficient flexibility in the quantum and design to make this realistically achievable or the means by which it could be achieved. Therefore we suggest that it is required that before the Master Plan is submitted for approval by the Secretary of State the applicant should propose options for building and landscape design, identify flexible zones of harmful and non-harmful land uses, and model the potential to increase the proportion of land in non-harmful land uses. Such information should be subject to consultation with Kent County Council, and if appropriate Historic England, before it is submitted to the Secretary of State for consideration.</p>	<p>The Applicant is considering the matters raised and whether to make any amendments to the requirements in the next iteration of the dDCO.</p>
<p>Schedule 2, proposed new Requirement 6.9.1. In some instances the preservation of important heritage assets might be appropriate but no provision is made in the Requirements for the preservation of archaeological remains, historic buildings and historic landscape character, if it is warranted. Therefore we suggest that it is required that before the Master Plan is approved the applicant should make proposals for the preservation and reuse, where appropriate, of important heritage assets, which should be subject to consultation with Kent County Council, and if appropriate Historic England, before they are submitted to the Secretary of State for consideration.</p>	<p>The Applicant is considering the matters raised and whether to make any amendments to the requirements in the next iteration of the dDCO.</p>

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<p>Requirement 18</p> <p>6.10.1. We query whether 8 weeks is a sufficient period of time for the Secretary of State to consult specialist advisors and reply to the Undertaker in view of the various issues that could arise. We think that a longer period of, say, 12 weeks might be more appropriate.</p>	<p>The Applicant is considering the matters raised and whether to make any amendments to the requirements in the next iteration of the dDCO.</p>
<p>8.1. As noted earlier, there are no designated heritage assets within the proposed development site at the present time; however we consider that further heritage assessment work might reveal heritage assets that have a level of importance equivalent to designated heritage assets such as listed buildings or scheduled monuments. We would expect that Kent County Council would take the leading role with the applicant in resolving heritage issues, but that Historic England could advise where we can add value, particularly in relation to any heritage assets that are revealed to be of national importance.</p>	<p>We note your response, and this will be taken into account during the detailed design phase and observed. No action is required.</p> <p>The significance of any heritage assets observed in archaeological works would be discussed with Kent County Council and Historic England who will be consultees on the Written Scheme of Investigation.</p>

2 PART 2: OTHER INTERESTED PARTIES

2.1 The Ramsgate Society [\[REP3-008\]](#)

Issue raised	Applicant's response
<p>2.6.1 Tourism is a vital, and growing, part of the local Thanet economy.</p>	<p>Socio-economic impact upon tourism as a result of the proposed development is considered within Chapter 13 of the ES [APP-034], paragraphs 13.8.68 - 13.8.85</p>

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<p>Thanet's visitor economy grew 19% in 2015, exhibiting the biggest growth in tourism across the whole of Kent. The total value of Thanet's visitor economy reached £293m with the district welcoming nearly 4 million visitors in that year. Research by Visit Kent shows that there has been a rise of 23.3% in the total number of direct tourism related jobs with the total in 2015 being 7,312 jobs. This number is expected to continue to grow.</p> <p>2.6.2 This growing tourism economy would be threatened by the introduction of a huge cargo airport with 24/7 operations and 17,000 noisy cargo flights a year. People would not travel to take holidays under the final approach of a 24/7 cargo airport. Many of our beaches, cafes, hotels and visitor attractions would become intolerable and unattractive to visitors due to levels of noise, roads clogged with haulage vehicles and significantly worsened air pollution.</p> <p>2.6.3 Ramsgate would lose tourist visitors and the tourism spend that they bring and the tourism industry jobs that they support. This inevitable loss to the visitor economy must be offset against any speculative gain in employment that might be generated by the airport in operation.</p>	<p>and is assessed as not having an adverse effect. Economic effects are centred on potential disruption to the local road network impacting upon employee and customer access to local attractions. There will be a higher number of HGVs and cars on the road network (Chapter 14: Traffic and Transport), with greatest increases on the A299 and Spitfire Way. Direct access to key tourist attractions is not anticipated to be significantly affected as these routes do not act as through roads and alternative routes are available. Mitigation measures are planned to manage movements and although slight delays to reach attractions may be experienced, the economic effect upon tourist attractions will be of negligible significance.</p> <p>In terms of indirect impacts upon amenity, such as increased traffic, noise or dust, detailed assessments have been undertaken in Chapter 6: Air Quality [APP-033], Chapter 12: Noise and Vibration and Chapter 14: Traffic and Transport [APP-034]. Based upon these assessments the effect is of negligible significance. Whilst tranquil conditions of the area may be affected by aircraft noise, it is not expected that this will adversely affect the local tourism industry. It is anticipated that the Proposed Development will attract more people to the area, so the number of people using associated tourist amenities will rise, with an anticipated effect of moderate beneficial significance.</p>
<p>3.4.4 Noise and vibration</p> <p>Noise is by far the most significant factor in any assessment of aviation effects on the quality of life of those residing, working and visiting towns and cities close to an airport. Past use of the airport, which at its peak in 2009/10 amounted to less than a third of that planned by RSP, gave rise to severe disruption and annoyance. Evidence from monitoring data shows that Ramsgate residents were regularly exposed to noise impacts in excess of 85dB SEL. Turning to the modelling undertaken by the applicant's consultants, their conclusions make for disturbing reading, viz:</p> <p><i>4.1.46 Again, in year 20, significant adverse effects have been identified as being likely as a result of an increase in noise in the following communities which are in the vicinity of the airport and flight paths: Ramsgate; Manston; St Nicholas at Wade; West Stourmouth; and Pegwell Bay.</i></p> <p><i>4.1.47 In these communities, aircraft noise would increase to the point where there would be a perceived change in quality of life</i></p>	<p>The potential noise effects resulting from the Proposed Development have been assessed in Chapter 12: Noise of the ES [APP-034]. A summary of the significant residual effects is provided at Section 12.10. Based on this assessment, The Applicant has developed a Noise Mitigation Plan to reduce noise effects [APP-009]. This includes measures to mitigate any potentially significant effects as a result of both the construction and operation of the Proposed Development.</p>

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<p><i>for occupants of buildings in these communities or a perceived change in the acoustic character of shared open spaces within these communities</i></p> <p>3.4.5 We are aware from work undertaken by the NO Night Flights group that the consultant's modelling probably understates the scale of the impact if actual noise levels are used when the airport was last in operation.¹⁸</p>	
<p>Historic Environment.</p> <p>Conveniently, from their viewpoint, RSP 'scoped out' any serious analysis of the impact of their proposals on the historic character and listed buildings in Ramsgate. A one kilometer wide zone around the site was adopted for analysis of 'direct effects' of aircraft noise and visual intrusion. 'Indirect effects' on the setting of historic buildings and conservation area outside this zone - which includes all 456 listed buildings in Ramsgate - and the Central area conservation Area - have been tested for significance using an untried and little tested methodology devised following research carried out for Historic England in 2014¹⁹</p> <p>3.4.6 However, inspection of this report suggests that RSP have wrongly applied the assessment criteria for airport expansion, in other words they have treated the historic buildings of Ramsgate as exposed to existing aviation noise. That is not the case. Correctly applied, the metric would require a site-specific assessment of each historic asset and consideration of absolute noise impact, rather than noise and annoyance averaged out over 16 and 8 hour periods. Unsurprisingly, the results are recorded as insignificant for Ramsgate, viz:</p> <p><i>4.1.30 Indirect effects on off-site heritage assets have been considered in line with Historic England guidance on assessing change to setting and aviation noise. In the majority of cases, effects have not been assessed as being likely to be significant, although it is considered that significant adverse effects may potentially arise at the Grade II listed buildings at Cleve Court and Cleve Lodge and at Wayborough House and Way House.(both buildings are outside Ramsgate)</i></p>	<p>As noted at ES Chapter 9 [APP-033], paragraphs 9.6 9.6.8-10 and 9.6.20-21, change to setting of heritage assets including listed buildings in Ramsgate has been considered in line with ANPS following HE guidance The Setting of Heritage Assets (9.6.8-10) and the Aviation Noise Metric (ANM) (9.6.20-21). This is the only adopted guidance for the assessment of change to setting arising from aviation noise and has been adopted by Historic England as best-practice guidance. It is clearly stated in the ES Chapter 9 (9.6.22) that 'As the site is currently not operational it is not subject to aviation noise currently and so the N60 contour was used to initially identify heritage assets'. Assessment was therefore carried out against the existing baseline of no flights, and no regard has been had in this assessment to any previous aviation noise baseline. The key metrics used in the ANM are the N60 (identifying numbers of exceedances of a 60dB noise level) and LAEQ (measurement of noise equalised over time), which have been used in the assessment.</p> <p>No significant adverse effects on heritage assets within Ramsgate were identified.</p> <p>The Heritage Action Zone (HAZ) is an area where heritage assets are used as a focus for economic regeneration. Effects on heritage assets, as defined by the Airports NPS, within the HAZ have been assessed as set out in ES Chapter 9 Historic Environment [APP-033] in line with the agreed scope and methodology for historic environment assessment and no significant adverse effects were identified. Effects on the HAZ are most appropriately assessed in terms of effects on the local economy and tourism, which are considered in ES Chapter 13 Socio-Economics. This chapter concluded that effects on the local economy and tourism would be minor beneficial, as summarised in [APP-034, Table 13.27].</p> <p>The assessment of change to setting arising from aviation noise carried out in line with the ANM refers to effects on the significance of heritage assets arising from perceptual change to setting as set out in ANPS. Effects on human receptors</p>

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<p>3.4.7 This conclusion is at complete variance with the previous findings on noise. While it is understood that the metric used is different, concerned with establishing the significance of noise on the setting of heritage assets, we wonder how the presence of heavily laden 747-400 class jets overflying the Royal Harbour and the central conservation area at less than 300 metres can be regarded as insignificant. The reality is, as evident from the airport's past use, of significant disturbance - both visually and audibly - to the enjoyment of those heritage assets diminishing the intrinsic value of both the asset and its setting.</p>	<p>arising from aviation noise, including sleep disturbance and human health are considered within ES Chapter 12 Noise and Vibration [APP-034] and ES Chapter 15 Human Health [APP-034] using criteria that better reflect these effects.</p>
<p>Health and Well Being</p> <p>3.4.8 We find the consultants work confusing and conclusions drawn difficult to square with the outcome of their analysis of noise. It is claimed that the benefits arising from introducing new jobs would mitigate the adverse health effects arising from increased noise and pollution. So:</p> <p><i>4.1.68 The Proposed Development is predicted to generate up to 3,420 direct job opportunities and approximately 20,000 further jobs indirectly in operation. Being in stable, good-quality employment is strongly associated with good health and wellbeing compared to being in long-term unemployment. As a result, the employment generated by the Proposed Development has the potential to offer important long-term health and wellbeing benefits and is predicted to have a moderate beneficial effect.</i></p> <p>3.4.9 In contrast the health effects are stated to be serious:</p> <p><i>4.1.72 Change in noise exposure due to the Proposed Development has the potential to lead up to 329 additional cases of hypertension prevalent within the population at Year 20 noise levels, which may be associated with up to four additional cases of heart disease, two cases of stroke and two cases of dementia per annum. An increase in depression or anxiety associated with high annoyance of up to 219 cases prevalent within the population is also possible. No significant impact on sleep disturbance is predicted due to the small number of night flights forecast. Depending on existing baseline environmental noise levels, there is potential for adverse impacts on children's</i></p>	<p>Every attempt has been applied to make the Health and Wellbeing assessment within the ES [APP-034] as clear and user friendly as possible, this response will provide the additional clarity that is requested.</p> <p>Please note that while a range of individual health pathways have been investigated (including noise and socio-economic health effects), it is not the case that the impacts and benefits have a cancelling effect, as the health evidence base and outcomes can vary, as will the geographic and temporal distribution (i.e. changes in noise exposure and changes in income and employment may not overlap or affect the same people). Each health determinant has therefore been considered alongside local community and health circumstance to assess the magnitude and significance of potential health outcomes.</p> <p>As detailed in the ES, and discussed with Public Health England (PHE), the change in noise on health is concluded as moderately significant, where prior to mitigation, there is the potential for a noticeable change in noise which, dependent on the relative timing and magnitude of exposure, has the potential to influence risk factors for cardiovascular disease and depression. This information has been applied to further refine the proposed project, where the proposed application will seek to place a commitment to contain night time movements to 06:00-07:00, and implement other mitigation measures as detailed in the Noise Mitigation Plan [APP-009]. This was welcomed by PHE and reinforces the original findings of the health assessment, and the professional opinion underlying the significance placed.</p> <p>In contrast, and as detailed in the ES, the re-opening of Manston Airport will generate direct, indirect and induced socio-economic health benefits through employment opportunities, and prior to mitigation/support initiatives intended to maximise the uptake of such opportunities locally, is considered to be moderately</p>

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<p><i>learning in schools affected by noise and on quality of life for worshippers at Christ Church. No significant effects due to change in noise at healthcare facilities are predicted.</i></p> <p>3.4.10 We have seen from the work of Altitude consultants covered in Part One that the Azimuth forecast of employment generation are both flawed in respect of the methodology employed and not credible given the unsustainability of their forecasts of ATMs. Even accepting the Azimuth air traffic forecasts Altitude conclude that the direct job benefits would amount to 2,291 at year 20 (as opposed to 4,271 claimed by Azimuth) and indirect job benefits of circa 2,500 as opposed to circa 20,000 claimed by Azimuth.</p> <p>3.4.11 Moreover as reported earlier any gain in employment would need to be netted off by the loss of tourist employment arising from the inevitable downturn in visitors to the town. We can therefore see no justification for the applicant's claim that employment generation mitigates the serious affects to health and well-being of Ramsgate's population.</p>	<p>significant. Socio-economic circumstance is a key determinant of health, so socio-economic benefits will also have a beneficial impact upon health and wellbeing.</p> <p>The concern raised regarding the importance of the tourism industry reinforces how income and employment are key determinants of health. However, for there to be an impact to this sector, there would have to be some tangible environmental impact detracting on this sector. The ES confirms this isn't the case, and no evidence has been provided to infer this would happen (including any evidence from when Manston airport was previously operating). Further detail is given in the socio-economic assessment within Chapter 13 of the ES [APP-034], paragraphs 13.8.68 - 13.8.85 and the Proposed Development is assessed as not having an adverse effect upon tourism. In terms of indirect impacts upon amenity, such as increased traffic, noise or dust, detailed assessments have been undertaken in Chapter 6: Air Quality, Chapter 12: Noise and Vibration and Chapter 14: Traffic and Transport. Based upon these assessments the effect is of negligible significance. Whilst tranquil conditions of the area may be affected by aircraft noise, it is not expected that this will adversely affect the local tourism industry. It is anticipated that the Proposed Development will attract more people to the area, so the number of people using associated tourist amenities will rise, with an anticipated effect of moderate beneficial significance.</p> <p>In response to 3.4.10, please refer to the Applicant's response to the ExA's FWQ SE.1.5.</p> <p>In response to 3.4.11, please refer to the Applicant's response to the ExA's FWQ SE.1.12.</p>
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2.2 Thanet Green Party [\[REP3-011\]](#)

Issue raised	Applicant's Response
The Thanet Green Party strongly objects to the proposal by RSP to re-open Manston Airport as a Cargo Hub, as we fear it would cause severe	It is understandable that the planning of any major infrastructure project may engender an array of community concerns. It is the purpose of planning to

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Issue raised	Applicant's Response
<p>damage to the area and its population if implemented. To quote from the documentation of RiverOak Strategic Partners (RSP) "There is health evidence drawn from the scientific literature that allows potential impacts on mortality and rates of certain diseases due to changes in noise and air pollutant exposure to be predicted quantitatively (in numerical terms). The scientific evidence shows that, depending on the level of noise or air pollution concentration, these may affect diseases of the heart, lungs and circulation system, mental health and wellbeing, and the overall risk of premature death."</p>	<p>investigate and address any potential risk from the construction and operation of the proposed development upon the environment and health. In this instance all catalogued community concerns have been assessed (Chapter 15 of the ES, and Appendices 15.1) and addressed through planning, including the potential risk of sleep disturbance from the operation of the airport and changes in local air quality.</p>
<p>2.3 Air Pollution and the Proposed Manston Cargo Airport</p> <p>2.4 Any operator at Manston is most likely to use old Boeing 747-400F aircraft, which ceased production over 20 years ago so will be more polluting. Aircraft use kerosene fuel which is similar to the diesel fuel used in vehicles. Like car exhausts, aircraft exhaust gasses contain a variety of air pollutants: including Carbon Dioxide (CO₂), Carbon Monoxide, Sulphur Dioxide, and the particularly dangerous PM and NO_x (see above). According to Boeing's Web site, the 747 burns approximately 4.2 gallons of fuel per mile (12 litres per kilometre) or around 1 gallon of fuel every second. But it burns 1,200 gallons on take-off, which is equal to 48,000 miles in a family car or twice around the world.</p> <p>2.5 PM_{2.5} is of special concern, since particulate emissions from jet exhausts are almost all in this fine fraction. Thanet District Council does not currently undertake any monitoring of PM_{2.5} and consequently there are no measures in place to specifically address PM_{2.5} concentrations within the District. PM₁₀ is only measured at 2 sites in Thanet (Birchington and Ramsgate), where</p>	<p>A full and robust assessment of the air quality impacts of the Proposed Development has been carried out, which found that air quality will remain well within the legal limits and other guideline levels set for the protection of human health and ecosystems, even with worst-case assumptions (APP-033, Environmental Statement Volume 1, Chapter 6). The assessment levels for humans are set on the basis of the most vulnerable members of society, including children, the elderly and those with chronic illnesses, and are set at levels to ensure that their health is protected. Worst-case assumptions were made around the likely age of the aircraft fleet. The assessment took into account traffic on roads around the airport, both airport-related and non-airport, as well as aircraft and other activity on the airport.</p> <p>Although PM_{2.5} is not monitored locally, Defra carries out detailed pollutant modelling across the whole country which is adjusted to fit nationwide monitoring data. This modelling is the basis for the background PM_{2.5} concentrations used in the assessment, which are well below legal limits. PM₁₀ is measured at two roadside sites in Thanet. Concentrations near the Proposed Development, which is well away from major roads, will be much lower. The monitored concentrations in 2014 were unusually low but the clear trend since 2009 is downwards at both monitors, averaging a reduction of 0.8 ug/m³ per year at the Ramsgate monitor and 0.2 ug/m³ per year at the Birchington monitor, with 2017 measured annual means of 24.7 and 23.0 respectively.</p>

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Issue raised	Applicant's Response
<p>both sites are under the annual mean. But worryingly, PM10 has been rising in both areas since</p> <p>2.6 2014.</p> <p>2.7 Monitors at Birchington, St. Lawrence and Ramsgate show NO2 annual exceedance levels of 40ug/m3; whilst both Manston NO2 monitors registered about 15ug/m3. Whilst this level remains low at present, it is also rising year-on-year. (Thanet District Council 2017 Air Quality Annual Status Report (ASR) June 20)</p> <p>2.8 The EU has found that CO2 emissions from aircraft have doubled since 1990, and predict NOx emissions will increase by 43% in the next 20 years. The Alliance of Residents concerning O'Hare inc. (AReCO 2011) reports that a single runway with light to medium traffic pollutes within a 6 mile radius and around 20 miles downwind - in other words, pollution from the conceived Manston project will reach the whole of the Island of Thanet and surrounding area.</p>	
<p>There are approximately 2,250 pupils in 4 schools within 3.5km of the airfield and under the flightpath, where flight heights are near or below 200m.</p> <p>The table below illustrates how many children's education would be disrupted during the daytime alone by a 24/7 Cargo Hub Airport at Manston:</p>	<p>The Noise Mitigation Plan [APP-009] specifies that reasonable levels of noise insulation and ventilation for schools within the 60 dB LAeq (16 hour) day time contour will be provided. In addition, the revised Noise Mitigation Plan now includes a school liaison committee and a commitment to provide additional assessment for all schools within the 50 dB contour.</p> <p>The Health Impact Assessment, Appendix 15.1 of the ES [APP-058] assesses the potential health impacts associated with changes in noise and air pollution. Where adverse effects are predicted, measures to mitigate these are set out in that Chapter.</p>

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Issue raised				Applicant's Response
Schools on Flightpath	Number of Pupils	Distance to Runway	Height of Aircraft Overhead	Potential for sleep disturbance has been assessed in Chapter 12: Noise and Vibration and in the Health Impact Assessment in Appendix 15.1 of the ES [APP-058 and APP-034, respectively]. No significant effect on sleep disturbance is predicted due to the anticipated low number and noise of night-time flights.
Chilton Primary School	422	1.8km	117m	
Ellington Infant School	204	2.5km	135m	
Christ Church Primary	253	2.75km	153m	
Chatham & Clarendon Grammar Schools	1372	3.5km	212m	
<p>Many of the pupils represented above, and particularly in the primary schools, live in close vicinity to their school. They will therefore continue to suffer from noise pollution in the home environment during weekends, holidays and during the night. Numerous studies on the effects of aircraft noise have shown that noise at night disturbs sleep: causing stress hormones which can affect the immune and cardiovascular system, increase asthma, hypertension and strokes.</p> <p>In How Noise Pollution can affect your Health (above) Stephen Stansfield wrote "Because people's bodies still respond to noise during sleep (and it wakes you up), one suggested pathway to ill-health is through repeated sleep disturbance. Being exposed to sound while you're asleep can particularly affect breathing, body movements, heart rate, and when you wake up. And you're more likely to be affected if you're elderly or a child, or you work shifts or have poor health. Research has also found that self-reported sleep disturbance is worse when it comes from aircraft noise than road traffic."</p>				

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Issue raised	Applicant's Response
<p>A study published in Occupational and Environmental Medicine titled “Long term aircraft noise is linked to incidence of high blood pressure” followed 420 people living near an airport in Greece and found that each 10 decibels of aircraft noise at night led to a 69 percent increase in the incidence of hypertension. In 2014, researchers found that children living near Logan Airport in Boston had quadruple the normal rates of asthma, while adults in the same radius had twice the incidence of Chronic Obstructive Pulmonary Disease (COPD). An earlier study in the British Medical Journal entitled “Aircraft noise and cardiovascular disease near Heathrow airport in London: small area study” found a direct link between airport noise exposure and stroke and cardiovascular disease. Some studies concluded that airport noise raises nervous system and cardiovascular levels even among children. In fact, a 2005 study published in The Lancet found that for every 10 decibels of increased noise pollution in the surroundings, reading levels for children fell behind by two months, and comprehension faltered proportionately. The WHO report: Burden of disease from environmental noise (2011) sought to clarify the relationship between the level of nocturnal noise and the effect of its disturbance, indicating its view that over 55dB is considered dangerous:</p> <p>Yet, as indicated in the tables above, the sound levels around the Clarendon House area of Ramsgate regularly rose above 90dB and an Lmax dbA above 85, so that pupils living within the vicinity of the five schools included in the Table above can expect to be suffering dangerous levels of dBs throughout both day and night, in line with the rhythm of RSP's planned 24/7 airport. Clearly all of the schools, and surrounding housing, should be included in a fairly, and sensitively, funded compulsory purchase order.</p>	<p>The Health Impact Assessment, Appendix 15.1 of the ES [APP-058] assesses the potential health impacts associated with changes in noise and air pollution. Where adverse effects are predicted, measures to mitigate these are set out in that Chapter.</p> <p>Health outcomes assessed include cardiovascular and respiratory diseases and mortality, mental health and dementia. Where adverse effects are predicted, measures to mitigate these are set out in Chapters 12 and 15 of the ES [APP-034].</p>
<p>RSP's planned Compensation</p> <p>Research has recorded a Boeing 747 as registering 90dB 1.6km away from a runway, and yet the monitor near Clarendon House some 3.5kms away has frequently peaked at 100dB. Yet, and despite the WHO recommendation that a maximum of 55dB is dangerous during the daytime (2011 above) and 40dB at night, RSP is not prepared to either replace the five schools in most dangerous locations to the airport, or</p>	<p>A revised Noise Mitigation Plan addressing these comments has been submitted at Deadline 4.</p>

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Issue raised	Applicant's Response
<p>rehouse any of those living in the vicinity. It has simply allocated a mere £4,000 to individual households for noise insulation, but destined only for houses subjected to over 63db. This compensation is not only woefully inadequate in terms of mitigating against the high levels of noise which these homes, schools and businesses will suffer, but neither would it be sufficient for others living, working and studying with levels of noise between 40dB and 50dB. There are built-up areas from as close as 1.4km to the runway with 40,000 Ramsgate residents who would be affected. Including the surrounding villages, and 38,500 inhabitants in Herne Bay, there are therefore near to 100,000 people who will be directly subjected to extremities of both noise and pollution. If this project were to go ahead, RSP would need to adequately fund a package of compensation offers to these residents, ranging from Compulsory to Voluntary purchase and rehousing, to full insulation. An additional problem lies in the number of listed buildings in Ramsgate, close to the airport. Gaining permissions to add sound insulating a listed building in many cases is impossible, resulting in an intolerable situation for the owners.</p>	
<p>SAFETY The Boeing 747-400F, the preferred workhorse for cargo, was introduced in 1993 and last delivered in 2008. So the youngest cargo aircraft will be over 20 years old, with none of the benefits of modern advances made in reduction of noise and pollution. Since the cost of replacing a 747-400F is high, and cargo operators typically fly them until they are ready for scrap, according to Boeing there are still about 300 noisy and polluting 747 freighters in operational service, carrying about half of the world's freighter air cargo. With the area around the airport, and beneath the runway, having a dense population in close proximity, and RSP proposing that 60% of its flights will take off over Ramsgate, the vulnerabilities of older aircraft in terms of accidents should be not be underestimated. When Manston had only 435 flights a year it experienced many dangerous incidents, some of which nearly resulted in major loss of life. For example, in August 2010 the local press reported that a plane from</p>	<p>All aircraft using Manston Airport will be certified by the appropriate authority and can therefore be assumed to be safe. It is beyond the scope of this application to consider aircraft certification procedures.</p> <p>Wake vortex is considered in the Noise Mitigation Plan.</p>

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Issue raised	Applicant's Response
<p>an Afghan operator KAM Air “struck its tail on the runway and the grass surface beyond the runway before becoming airborne during take-off from Manston Airport. Investigations of this serious incident by the United Kingdom concluded that there were serious deficiencies with the operational control of the DC8 fleet of KAM Air.” (para 14, COMMISSION REGULATION (EU) No 1071/2010). In Southwood Gardens some 2.5kms from the runway, a vortex incident in 2012 caused an entire roof to narrowly miss hitting a neighbour as it fell into her garden. And neighbours to Clarendon House School relate having witnessed planes coming in to land and, apparently having missed dumping fuel into the sea, instead dropped it on to the school whilst passing low overhead.</p>	
<p>CONCLUSION When compared with all other areas in Kent, or even Britain, Thanet residents are the worst prepared mentally and physically for a major assault of pollution and noise, and therefore the more susceptible to its influences. The RSP PEIR at 15.3.6 quoted the Kent Director of Public Health, who had highlighted that the area around Manston has “low life expectancy and high rates of all-age, all-cause mortality in comparison to the rest of Kent”, and that “the local health economy is currently struggling to deliver sustainable health care facilities” (15.3.7). Since it also accepts the health risks which the fulfilment of its plans will bring to this at-risk community (see Introduction above), RSP exposes itself as, at best, adopting a cavalier attitude towards the outcome of its plans. At worst, it could be seen to have cynically targeted this deprived area, with a view to callously exploiting the need for employment: hugely overstating the number of jobs to be created, whilst minimising the real long-term negative environmental effects. RSP has been less than honest in the outline of its plans, and promises to be less than fair to the population of Thanet in developing them. We ask the Planning Inspectorate to exhibit far greater concern and care for Thanet Residents by rejecting RSP's request for a DCO.</p>	<p>As part of the planning application for the Proposed Development, a Health Impact Assessment, Appendix 15.1 of the ES [APP-058], has been conducted. This assesses the potential health impacts associated with changes in noise and air pollution, taking account of the current state of the community's health. Where adverse effects are predicted, measures to mitigate these are set out in topic chapters in order to minimise potential affects upon the community.</p>

2.9 Stone Hill Park Limited [\[REP3-025\]](#)

Section 2 and Appendix 1 – NSIP status

- 2.9.1 SHP is still questioning whether the project is a nationally significant infrastructure project. It is, however, obvious common sense that increasing the number of cargo stands from two to 19 will dramatically increase the capability of the airport by well over the threshold of just under 28 air transport movements a day. In any event, as became clear at the preliminary meeting and the DCO hearing in January, the ExA considers that having accepted the application, it considers the matter closed.
- 2.9.2 Although the Applicant has now proposed a cap on air transport movements of 26,468 movements per day so that this is now somewhat redundant, SHP continues to be wrong in law by confusing environmental assessment with capability. An airport can have a capability of 83,220 ATMs but its likely significant effects, which are the subject of environmental assessment, could arise from a lower figure corresponding to the likely use of the facility, just as highways do not assess the effects of the maximum possible number of vehicles they could accommodate.
- 2.9.3 The insinuation that the Applicant is seeking to secure ownership of the land for development unrelated to its use as a freight airport is not just untrue but flies in the face of the facts: the Applicant expended considerable time and effort successfully defeating a planning appeal that sought to change the use of some of the buildings on the site to non-airport use, and has spent millions of pounds to date on developing and promoting an airport DCO application and demolishing the case for housing on the site. There is literally no evidence to suggest otherwise.

Section 3 (part) and Appendix 2 – site history

- 2.9.4 The history of the site is not relevant when the infrastructure that is being proposed as part of this development is fundamentally different than what has previously operated; indeed, it is the lack of investment to bring it to this greater capability that has contributed to previous failures.

Section 3 (remainder), Section 6 and Appendix 4 – need

- 2.9.5 The rest of section 3 and all of section 6 concern themselves with the SHP case that there is no need for a cargo airport at Manston. The core of the argument is the claim that there is no demand for dedicated freighter capacity in the UK; even if there were, Manston is in the wrong place; and even if it were in the right place it would have to have night flights at a much greater rate than proposed for it to be viable.

- 2.9.6 The Applicant's case is firmly that none of that is correct. The demand for dedicated freighter capacity is evidenced by (a) the share of bellyhold and dedicated freighters outside the UK being far more balanced, whereas in the UK bellyhold dominates the market; (b) that the two major cargo airports in the south-east, Heathrow and Stansted, are focusing on passenger expansion rather than freight (and that East Midlands Airport serves a different function and is not in the south east), and (c) that fact that goods are currently trucked through the Channel Tunnel to and from airports in mainland Europe to access dedicated freighter services not conveniently available in the South East. An expanded Heathrow will not open until 2026 at the earliest and is to be phased over 10 years; Manston will have opened well before then.
- 2.9.7 As and when the UK leaves the European Union, the demand for both imports from and exports to countries further afield will become ever more urgent and for the UK to be best-placed to exploit such opportunities it should not be restricted to serving cities to which passengers fly or only to exporting and importing goods that can be contained in passenger aircraft. The trend towards low-cost carriers (both short-haul and increasingly long-haul) will further reduce the availability of bellyhold cargo as they do not carry it.
- 2.9.8 Government policy is expressed as supportive of airports other than Heathrow making best use of their existing runways, indeed that is the title of the June 2018 policy paper on the future of UK aviation, which is what this proposal does. Given the extreme difficulty of bringing forward a new runway in the UK, very serious consideration should be given before this national asset is lost to aviation.
- 2.9.9 Concerning Manston's location, as the Altitude report at Appendix 5 states, it is within three hours of London and the South East of England, one of the largest conurbations in the world; furthermore there is dual carriageway or better from the edge of the airport site to those locations and there is a railway line offering high speed services to London running close by. This high quality connectivity is complemented by the fact the site is close to the sea on three sides meaning that its noise and other environmental impacts affect a relatively small number of people.
- 2.9.10 On night flights, the Applicant's evidence is that these only tend to be at night either because of a traditional integrator operation as at East Midlands Airport, which the Applicant is not seeking to reproduce, or because passenger flights are dominating the daytime schedule, as at Stansted. For example, although there are a similar number of cargo flights year-round at Stansted, there are fewer during the night in winter, when there are fewer passenger flights during the day, i.e. the cargo flights take place during the day when they can. Furthermore, Frankfurt Airport carries the highest number of dedicated freighter flights in Europe and yet has a night-time ban on flights.
- 2.9.11 Finally, to quote the York Aviation Ltd Note on Freight Connectivity for Transport for London appended to Appendix 4:
- "It is reasonable to assume that around 14,000 freighters a year [required in 2012] could still be accommodated in the vicinity of London by using capacity at airports such as Manston, which already handles some long haul freighters. However, capacity equivalent to an additional

54,000 freighter movements per year could be required to ensure demand [in 2050] is met, although this could be mitigated to an extent if the freighter capacity was prioritised for freight to and from the UK with less transit freight."

- 2.9.12 A fuller assessment of the need for dedicated freighter capacity in the south east of England in response to the Stone Hill Park reports from Altitude Advisory and York Aviation, provided by Northpoint Aviation, is included as TR020002/D4/WRC/Appendix.

Section 4 and Appendix 3 – housing

- 2.9.13 This section promotes SHP's housing proposal, although is based rather more on the general need for housing in Thanet than the proposal itself. Manston airfield is not a sustainable location for residential development, it is located entirely in the countryside, remote from the services, public transport and utilities that would be required to serve a substantial number of houses. It is also situated on an aquifer, and would result in a high risk of water contamination. No transport improvements are proposed to cope with the travel needs of an additional 3,700 households. The proposal has attracted significant objections from statutory bodies and the local community (over 375 objections in total) and has progressed little since an application was first made in May 2016.
- 2.9.14 There are many sites available for housing in the UK but virtually none available for airport development. There is no shortage of housing land in Thanet. There is no requirement to develop the airfield for housing to meet Thanet's housing needs.

Section 5 – size of proposal

- 2.9.15 This section questions the size of the development given the number of flights that are expected. As explained in the NSIP Justification, paragraph 29, "First, significant 'headroom' is required to be able to withstand operational issues that regularly arise and so is for reasons of resilience. Secondly, our business model is to provide sufficient capacity to be able to accommodate aircraft when the airline wants to operate rather than to suit the airport through slot management, which requires a much greater availability of stands."
- 2.9.16 It questions the size of the northern grass as well, citing the Pegasus Business Park at East Midlands Airport. However that is only one area of commercial development at that airport, whose brochure states that it has 218 acres of commercial property (882,000m², eight times the size of the northern grass), with a further 50 acres available (202,000m²).
- 2.9.17 Also, the size of the northern grass is not 'completely out of proportion to the principal development', as alleged - it is 26 acres of developable land compared to 800 for the whole site area.

Section 7 and Appendix 5 – financing

2.9.18 Appended to this response is a report from Northpoint Aviation rebutting the allegations made in the Altitude Aviation report.

Appendices

2.9.19 These are rather confused, as there is no indication where each appendix starts or ends. Pages 27 - 236 of the representation seem to be repeats. The Applicant has assumed that those 209 pages should be ignored and Appendix 1 starts on page 237. All but Appendix 6 are covered in the remarks above.

Appendix 6 – compensation

2.9.20 To the extent that the quantum of compensation is properly within the remit of the examination, the last two acquisitions of the site were for just £1 and then £7m, both in 2014, although in the latter case the buyer borrowed that amount from the seller, a related company, to acquire the site. The Applicant's consultant CBRE's estimate of £7.5m four years later is therefore clearly a generous one.

2.10 RSPB [\[REP3-013\]](#)

3 PART 3: GENERAL TOPICS RAISED BY LOCAL COMMUNITY MEMBERS OR REPRESENTATIVES

3.1 Air quality

3.1.1 The Applicant's assessment of the effects of the Proposed Development on air quality is set out at in **Chapter 6: Air Quality** of the Environmental Statement (ES) [\[APP-033\]](#). Table 6.40 summarises the conclusions on the significance of the effects assessed. Effects on human health have been assessed as not significant, as all air quality impacts are within legal limits set for the protection of human health.

3.1.2 In answer to question AQ.1.2, of the ExA's First Written Questions, the Applicant explained that road traffic emissions are not predicted to have significant effects on the Thanet Air Quality Management Area. The assessment presented in the ES shows that impacts of road traffic emissions are negligible everywhere within the AQMA [\[APP-033\]](#) paragraph 6.11.5 et seq].

3.2 Climate change

3.2.1 The Applicant has set out the likely significant effects in relation to Climate Change resulting from the Proposed Development at **Chapter 16: Climate Change** of the ES [\[APP-034\]](#).

- 3.2.2 Radical changes in climate are being considered in the Climate Change Adaptation Strategy, a framework version for which has been provided to the Examination at Deadline 4 [TR020002/D4/CCASF].

3.3 Biodiversity

- 3.3.1 The impact of the Proposed Development on biodiversity receptors is assessed in full in **Chapter 7: Biodiversity** of the ES [APP-033] which concluded that there will be no significant effects. The assessment was undertaken following the Guidelines for Ecological Impact Assessment (CIEEM, 2016¹) and followed a structured approach to the identification of receptors, determining whether potential receptors are of sufficient importance that an effect or change resulting from the implementation of the proposed development could be significant.

3.4 Funding and Resources

- 3.4.1 In responding to the ExA's First Written Questions, a summary of the Applicant's business model was provided at Appendix F.1.5 [REP3-187]. The Applicant also provided its Capital Expenditure budget of £306m at Appendix F.1.6 in [REP3-187].

3.5 Noise

- 3.5.1 Full details of the Applicant's noise assessment are presented in **Chapter 12: Noise** of the ES [APP-034]. The assessment relating to psychological and physiological health outcomes and the effectiveness of noise insulation can be found in **Chapter 15: Human Health** of the ES [APP-034].
- 3.5.2 The Applicant has submitted a further revised Noise Mitigation Plan at Deadline 4 (TR020002/D4/2.4) with more detail on many of the measures proposed, and an increase in the sound insulation payments available from £4,000 to £10,000. Also provided at Deadline 4 are further noise contour maps (TR020002/D4/NCM) and a note on 'Disability Adjusted Life Years' (DALYs) (TR020002/D4/DALY).
- 3.5.3 In answer to question Ns.1.5, of the ExA's First Written Questions, the Applicant explained that it considers that adverse health outcomes associated with noise exposure in affected buildings would be reduced in proportion to the effectiveness of sound insulation at further attenuating noise and reducing indoor noise levels. In its response the Applicant included, at Appendix Ns.1.5 [REP3-187], a review of studies of transport noise 'interventions' undertaken to inform the WHO Environmental Noise Guidelines for the European Region which indicated studies did find a decrease in annoyance and sleep disturbance associated with installation of sound insulation.

¹ Chartered Institute of Ecology and Environmental Management (CIEEM) (2016). Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater and Coastal, (2nd edition). CIEEM, Winchester.

3.6 Socio-economic

- 3.6.1 The socio-economic assessment presented in **Chapter 13: Socio-economics** of the ES [[APP-034](#)] assessment determined the Proposed Development would result in major beneficial effects on employment locally based on the creation of 3,417 direct jobs and a further 6,151 indirect jobs by Year 20 (see Table 13.24 in Chapter 13 of the ES for full breakdown of forecast job creation).
- 3.6.2 In responding to question SE.1.5, of the ExA's First Written Questions, the Applicant explained that it has engaged with East Kent College and Canterbury Christ Church University to establish the best way to encourage the creation of skilled workers. Commitments around education, training and local recruitment will be captured in a Section 106 Agreement with Kent County Council, as was discussed at the meeting of 9 January 2019 (see Appendix SE.1.7. [[REP3-187](#)]).

3.7 Transport and Traffic

- 3.7.1 A suite of traffic and transport technical documents have been produced in support of the Development Consent Order application, primarily **Chapter 14: Traffic and Transport** and the Transport Assessment in the ES [[APP-034](#) and [APP-060](#) to [APP-073](#)].
- 3.7.2 The Traffic and Transport chapter of the ES identified that there will be no residual significant effects on the local highway network as a result of the Proposed Development at Manston Airport. The local highway network within the scope of assessment was assessed using the Guidelines for the Environmental Assessment of Road Traffic (GEART), Institute of Environmental Assessment (2003), which assessed a number of receptors for significant effects using the established indicators; severance, driver delay, pedestrian delay and amenity, fear and intimidation and accidents and safety.
- 3.7.3 The Applicant has been requested to carry out additional transport modelling using the Kent County Council (KCC) transport model and expects to submit a revised Transport Assessment at Deadline 5 (see paragraph 9.3 of the Applicants Deadline 4 covering letter to the ExA for further detail of this).

4 PART 4: SPECIFIC ISSUES RAISED BY LOCAL COMMUNITY MEMBERS OR REPRESENTATIVES

4.1 Why have you not environmentally assessed 83,220 movements when you say this is the capability of the airport?

- 4.1.1 83,220 is the theoretical capability of the airport, a calculation needed to decide whether a cargo airport is a nationally significant infrastructure project. The Environmental Statement assesses likely significant effects, which arise from (amongst other things) a realistic worst case in terms of number of flights that will occur at the airport when it is fully operational, namely 17,170 cargo aircraft and 9,298 passenger aircraft

movements. The Applicant has decided to offer a cap of this total (26,468) in response to the representations made, even though the capability of the airport is considerably higher.

4.2 Why not ban night flights altogether?

4.2.1 The Applicant is not seeking permission for any departures or scheduled arrivals for most of the night-time period. This has always been the case but in response to public concern, the updated noise mitigation plan limits the airport operator, ensuring that scheduled departures for passenger flights are only allowed after 0600; other than that only emergency, late-running, humanitarian and reliever flights will be permitted. The total will be limited by the annual limit proposed for air transport movements, and also the quota count for night-time flights (other than emergency or relief flights).

4.3 Will you comply with a national quota count if one is introduced?

4.3.1 Yes, if it applies to Manston Airport in due course; this is at an early stage in CAA document CAP 1731 (paragraph 66).

4.4 Wouldn't the noise monitoring station, at 6.5km from the airport, be in the sea?

4.4.1 No, the distance is measured from the 'start of roll', i.e. the western end of the runway, meaning it will be in the centre of Ramsgate.

4.5 Will local people benefit from quieter aircraft technology as it is brought forward?

4.5.1 Yes. The cap on air transport movements means that as aircraft become quieter, the noise impacts will become less for the same number of movements.

4.6 Won't 225 residential dwellings be significantly affected by noise by Year 20?

4.6.1 That is indeed the prediction in the Environmental Statement [[APP-034](#)] (paragraph 12.7.53), but that is the prediction without any mitigation in place such as sound insulation, which is being offered to all those properties as part of the Noise Mitigation Plan. Noise insulation will avoid the significant effects of noise on people in their homes. The amount available to households in the form of a insulation and ventilation grant has been increased from £4,000 to £10,000 per property as stated in the updated noise mitigation plan.

4.7 Aren't listed buildings unable to be insulated from sound?

- 4.7.1 Not necessarily. Although listed buildings cannot generally benefit from double glazing, they can usually have secondary glazing installed. Care should be taken that listed building consent is not required (or is obtained) from the local planning authority before undertaking any works.

4.8 What about schools?

- 4.8.1 The Applicant is conscious that schools are likely to be affected by aircraft noise, particularly in Ramsgate. Sound insulation is offered to community buildings (which include schools) within the 60 dB daytime noise contour compared to 63 dB for residential properties. For schools within the 50 dB contour, the revised Noise Mitigation Plan undertakes to visit and measure noise levels at such properties and develop appropriate noise mitigation measures. A schools liaison committee will also be established.

4.9 Won't operating Manston have a serious effect on the health of local people?

- 4.9.1 The Applicant has assessed health impacts in Chapter 15 of the Environmental Statement [[APP-034](#)]. The chapter concludes (in table 15.9) that before mitigation is considered, there would be a moderate adverse impact from operational noise on cardiovascular and mental health and wellbeing at residential receptors, a minor adverse impact from operational noise on schools, and a minor adverse impact from operational air pollution on cardiovascular and respiratory health for residential receptors. The mitigation proposed in the Noise Mitigation Plan (which has now been revised twice to include further mitigation, including raising the amount offered for sound insulation from £4,000 to £10,000) will reduce these effects.
- 4.9.2 Putting Manston in context, it is proposed that there will be a maximum of 26,468 air transport movements per year. Heathrow, which has considerably more residential receptors on its flightpaths, had 467,186 ATMs in 2017, 18 times as many as proposed at Manston, and if the third runway is built, its capacity will rise to 720,000 ATMs, 27 times as many.

4.10 Would the operation of the airport be in breach of the EU Air Quality Directive, and how would you monitor air quality?

- 4.10.1 No; our assessments show that it would operate within the prescribed limits and not breach any thresholds. Air quality monitoring will be carried out by the local authority and is proposed to be funded by the Applicant via a section 106 agreement.

4.11 Will transport infrastructure improvements be funded?

- 4.11.1 Yes, the applicant has agreed to mitigate any impacts on the road network that may result from the reopening of the airport. The necessary upgrades are reported in the Transport Assessment that accompanied the DCO application. Road upgrades adjacent to the site form part of

the application, others will be funded separately as necessary. Note that the Applicant is supportive of TDC's proposals for Thanet Parkway Station but as the application does not depend on this proposal it is not funding this initiative.

4.12 How many jobs will be created?

4.12.1 The Azimuth Report [[APP-085](#)] sets out the predicted number of jobs of various types created at each year of operation, at Table 4 on page 29 of Volume 4 (page 221 of the whole document). The total number of jobs at the airport is predicted to be 3,417 in the 20th year of operation, with a further 6,151 indirect and induced jobs in the local area and 13,668 catalytic jobs in the wider economy.

4.13 Will the jobs that are created be offset by losses to the tourism industry?

4.13.1 The Applicant's case is that tourist jobs will not be lost and tourism is likely to grow (page 47 of Volume 4 of APP-085); tourist destinations benefit from being served by a nearby airport, as can be seen at Southend-on-Sea, Bournemouth and Southampton.

4.14 Will local people have the skills to take up the jobs that are created?

4.14.1 The Applicant is conscious that at present there is a shortage of appropriate skills for many of the jobs that would be generated by the reopening of Manston (although by no means all of them), and is working with local educational institutions such as East Kent College and Canterbury Christ Church University to ensure that the appropriate training for the created jobs can be provided. The Applicant's commitments will be contained a section 106 agreement to be concluded with Kent County Council.

4.15 How will you ensure security at the airport?

4.15.1 Security is a primary concern of the Applicant, and a number of the Examining Authority's First Written Questions dealt with this issue (in particular LV.1.30 – LV.1.35 – see the Applicant's answers in [[REP3-195](#)]). Security will form part of the aerodrome certification process with the Civil Aviation Authority, which has very strict requirements.

4.16 Other reports say that there is no unmet demand for dedicated cargo flights, why do you say there is demand?

4.16.1 The Applicant's need case is summarised in paragraph 3.1.6 above. [i.e. the response to SHP's WR, namely

3.1.6 ... *The demand for dedicated freighter capacity is evidenced by (a) the share of bellyhold and dedicated freighters outside the UK being far more balanced, whereas in the UK bellyhold dominates the market; (b) that the two major cargo airports in the south-east, Heathrow and Stansted, are*

focusing on passenger expansion rather than freight (and that East Midlands Airport serves a different function and is not in the south east), and (c) that fact that goods are currently trucked through the Channel Tunnel to and from airports in mainland Europe to access dedicated freighter services not conveniently available in the South East. An expanded Heathrow will not open until 2026 at the earliest and is to be phased over 10 years; Manston will have opened well before then.]

4.17 Why are you not introducing a Public Safety Zone?

4.17.1 As set out in answer to the Examining Authority's question OP.1.7, guidance states that PSZs should be established at airports with 1,500 air transport movements per month (i.e. 18,000 per year) and likely to exceed 2,500 air transport movements per month (i.e. 30,000 per year). As the Applicant has offered a cap of ATMs of under 27,000 per year, this will not reach 18,000 ATMs for some time and will not under the current application ever reach 30,000 ATMs. If it does approach those figures then the establishment of a PSZ will be considered.

4.18 York Aviation say you have misrepresented them. Is that the case?

4.18.1 The Applicant does not believe that it has misrepresented York Aviation's 2013 report to TfL (which can be found at page 308 of Stone Hill Park Ltd's relevant representation [\[RR-1601\]](#)) or its 2015 report to the FTA and TfL, which can be found at [this link](#). At paragraph 24 of the report, it states that if there are no new runways in the south-east, the number of freighters will be constrained, and at paragraph 25 that capacity equivalent to 54,000 freighter movements per year could be required by 2050 to ensure demand is met, more than three times the number being proposed by the Applicant at Manston. Although not necessarily a linear increase from the base of 2012, that would suggest that by 2026, the earliest that a third runway at Heathrow is expected, there will be a need for 20,000 required freighter movements that is not being met, more than the Applicant proposes at Manston.

4.18.2 The first report does not deal with the effect of a new runway at Heathrow; it covers new runways at both Gatwick and Stansted, and a four runway estuary airport. The second report (written in 2015 for Transport for London (TfL) and the Freight Transport Association (FTA)) does deal with a third runway at Heathrow. The freighter movement shortfall at 2050 with no expansion has risen to 79,712, and shortfall with a third runway at Heathrow is given as 44,927. This report additionally assumes that if freighter capacity was available in the London system (through the estuary airport), no freight would be diverted elsewhere. The Applicant's case is as above that until Heathrow is expanded, need for freight generally will increase and can be partly met by Manston, and even when Heathrow is expanded, almost all of Heathrow's freight will be bellyhold and there will still be a need for dedicated cargo capacity.

4.18.3 York has not made clear the substance of their allegation, rather they make a general statement of misrepresentation. Prior to citing the York 2015 report (and presumably before York were retained by Stone Hill Park Ltd), Azimuth and RSP contacted York to check understanding and whether York stood by their findings. This was with confirmed both verbally and in writing. Additionally, the two clients for this work, TfL

and the FTA have been contacted and asked to review the references made by Azimuth to the 2015 report. Both used the York report to respond to government consultations, drawing conclusions in much the same way as Azimuth. Neither found any issue with the citations made by Azimuth.

4.19 Isn't the project now proposed inconsistent with what was consulted upon?

4.19.1 No. The Applicant has developed its proposals over time although they have not changed significantly since the original (non-statutory) consultation exercise in 2016. It is the actual application that has been made that is before the examination rather than any consultation version, and which should be the subject of any representations.

4.20 Will the airport operate like it did before?

4.20.1 No. The Applicant is proposing a radically different layout for the airport than was the case when it was previously open. For example:

- (a) There will be 19 cargo stands instead of two previously, meaning that there will be little constraint on flights arriving and leaving during the day.
- (b) There will be cargo facilities to allow cargo to be exported from the UK as well as imported; previously only imports were possible.
- (c) There will be an Instrument Landing System (ILS) at either end of the runway, whereas previously there was ILS only at the eastern (Ramsgate) end so that more aircraft can take off in an easterly direction and land in a westerly one, thereby reducing the impacts on Ramsgate when weather conditions allow.

4.21 Have you considered alternatives?

4.21.1 Yes. These are covered in Chapter 2 of the Environmental Statement [[APP-033](#)]. There are no alternatives that meet the requirements of runway length, proximity to London but outside London airspace, good surface transport links, existing infrastructure (particularly the runway), and capacity for dedicated freighters.