MANSTON AIRPORT DCO 2022 — NON-MATERIAL CHANGE 3 CONSULTATION

PINS REFERENCE: TR020002

INTERESTED PART REFERENCE NUMBER: [redacted]

INTERESTED PARTY SUBMISSION: Ramsgate Town Council

Ramsgate Town Council has considered the further information provided by RiverOak Strategic Partners Ltd in response to the Secretary of State's letters dated 11 August and 11 September 2026, including the Environmental Appraisal prepared by ERM.

The Council notes that the Secretary of State considered the information originally provided on 25 August insufficient to determine whether an updated Environmental Statement was required and, consequently, the materiality of the requested changes. The Council considers this an important point given the proposal to extend the commencement period by a further two years.

The Council acknowledges that ERM's subsequent Environmental Appraisal considers a broad range of topics and concludes that foreseeable baseline changes would not materially alter the original Environmental Statement's conclusions. It recognises that the application does not propose changes to the authorised development's scale, footprint, capacity or assessed operational characteristics.

The Council notes that the original Environmental Statement was published in 2018, approximately eight years before the September 2026 Environmental Appraisal. This raises a concern as to whether the underlying surveys, baseline information and assumptions remain sufficiently up to date to provide a reliable basis for the appraisal. Although the age of the Environmental Statement does not in itself invalidate its conclusions, the Council asks that the applicant clearly identify the dates of the evidence relied upon, the subsequent updates taken into account and the reasons why any older information remains representative. The assessment should address changes since the original evidence was collected, rather than only changes expected during the proposed additional two-year commencement period. Where the continuing validity of that evidence cannot be demonstrated, updated surveys or further assessment should be provided before the application is determined.

Nevertheless, given the potential effects on Ramsgate, particularly aircraft noise, traffic, air quality, health and wellbeing, the Council asks the Secretary of State to be satisfied that sufficiently current and robust evidence demonstrates that changes in environmental baseline conditions would not give rise to new or materially different likely significant environmental effects. Biodiversity, ecology and cumulative effects should also be adequately addressed before determining that the extension can properly be treated as non-material.

The Council particularly notes the significant operational aircraft noise effects identified in the original Environmental Statement and the appraisal's reliance in part on subsequent airspace change work. It asks the Secretary of State to scrutinise that evidence and its relevance to Ramsgate. As commencement could occur later than contemplated by the existing DCO, reliance on the original assessments should be

accepted only where their conclusions remain supported by sufficiently current evidence.

The Council also asks that climate change be explicitly addressed in the environmental evidence supporting the application. In particular, the Secretary of State should be satisfied that the assessment takes account of changes since the original 2018 Environmental Statement and that sufficiently current and robust evidence supports the conclusions on climate change in the context of the proposed extension to the commencement period. Where this cannot be demonstrated, updated information or further assessment should be provided before the application is determined.

In relation to Requirement 24 and the HRDF, the Council notes the Ministry of Defence's withdrawal of its objection to the proposed amendment, subject to its requested wording change. This does not itself confirm that replacement equipment is unnecessary. Any amended requirement should retain the Ministry's written decision-making role on replacement equipment and maintain the applicable safeguarding protections.

The Council therefore asks the Secretary of State to give careful consideration to whether the Environmental Appraisal adequately resolves the concerns identified in the letter of 11 September 2026 before determining the application.