

## COMMUNITY SERVICES

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Date: 20/07/17



Mr G Yerrall  
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Dear Mr Yerrall,

### **Application by RiverOak Investment Corp LLC for an Order Granting Development Consent for Manston Airport**

#### **Statutory Consultation on Proposed Project**

Thank you for your consulting Thanet District Council under the provisions of Section 42 of the Planning Act 2008.

We will outline our specific comments on the information provided at this pre-application consultation stage of the process.

#### **Principle and Policy Conflict**

The proposed redevelopment of the Manston Airport site as a dedicated freight airport with additional uses would be directly contrary to the emerging Local Plan (to 2031) policy SP05, which allocates the site for a mixed use development with the capacity to deliver at least 2,500 new dwellings and up to 85,000sqm employment and leisure floorspace. It is considered on the basis of the Council's empirical evidence that airport operations at Manston are very unlikely to be financially viable in the longer term, and not possible in the period to 2031, and this has informed the proposed allocation within the preferred options revisions consulted upon in January 2017.

#### **Basis of Project and Business Case**

We have reviewed the 'Outline Business Case' submitted as part of your public consultation. This provides a high-level overview of the perceived benefits of the project, rather than as a business case for how the project will be funded and delivered. For example, at a basic level it does not include any breakdown of the cost of the proposed work (6a-m). There is a severe lack of detail about where additional investment, to develop the airport to the point where the development would be capable of providing services to handle 10,000 air transport movements of cargo aircraft a year, will come from, and what the actual amount of investment required to achieve 10,000 air transport movements is. It is also the case that there is a lack of information or evidence about how these 10,000 flights will occur without any operators identified or secured for the site, and only limited interest has been outlined in the background documentation from two smaller operators.

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The resource implications of both acquiring the land and implementing the project will need to be provided in the full submission, including outlining the degree to which other bodies have agreed to make financial contributions or to underwrite the scheme to fill any shortfall, and on what basis such contribution or underwriting has been made. Without this information there is significant uncertainty about the delivery of the project.

Putting aside what the Planning Inspectorate might want to see we would expect additional financial information to provide certainty about the delivery of the project, at the same level as the requirements on public-funded bodies under 'The Green Book' appraisal approach to provide certainty to the local community and the Inspectorate about the delivery of the project.

## **Economic impacts**

The 'Overview Report' states that by year two of operation, you expect 850 people to be directly employed on the site, with a further 5,000 people employed within the region in the supply chain, in associated industries or businesses or as a result of the airport's presence in the economy. By year 20 these figures are expected to rise to over 4,200 people at the airport site and a further 26,000 in the wider regional economy. The 'wider regional economy' is not defined in any of the consultation documentation, and we would expect this to be defined clearly in the full submission, linked to empirical evidence of regional economic impacts from airports so that its impact can be assessed independently.

The job numbers have been derived from the estimates from the Azimuth Associates documentation to create a formulae linking freight tonnage to job numbers on a theoretical basis. No optimism bias has been allowed for in these estimates, nor has the growth in automation been considered in this academic study. Without any information about who is going to deliver the freight tonnage and therefore create the job numbers stated we question whether the economic benefits of the airport in terms of job creation can be considered deliverable.

In turn this uncertainty makes us question the significance of the beneficial socio-economic impacts from the development within your Preliminary Environmental Information Report (PEIR).

On the critical point of economic impact we would want to see greater use of different sources of data to reduce the dependence on this academic study.

## **Housing Requirements**

Notwithstanding these concerns, the implications of proposed job creation on the amount of housing required in both Thanet and East Kent is a significant concern. This is briefly mentioned at point 13.9.8 of the PEIR, characterised as a major adverse – significant (impact). The emerging Local Plan's stated housing need to 2031 (17,140 homes) is predicated upon the expected addition of 5000 jobs in the same period. The development of your airport, by virtue of the estimated job numbers created both directly and within the supply chain, has the potential to significantly affect the objectively assessed need (OAN) for housing within the East Kent region.

The impact is a likely significant increase in housing land requirements. This may result in indirect effects, such as additional loss of countryside through housing development, which has not been assessed in the PEIR and significant new infrastructure demands. An assessment must be carried out within the full submission reviewing job creation in your project and the relevant plan documents in Thanet, Dover and Canterbury (phased over respective plan periods), reviewing the labour supply with existing studies available in all three areas, assessing where the projected workforce will be drawn from to the airport, modelling migration adjustment from this information therefore deriving implications on housing need in the district and the region.

The loss of the site as an allocation in the emerging Local Plan, for at least 2,500 dwellings, does not appear to have been considered in your submission. The proposal would also result in the loss of 56 open market units and 56no. extra care units approved on the Jentex site, meaning the total housing

shortfall resulting from this development would be at least 2,612. This would be a direct impact from your project, and the ramifications for this on Thanet's countryside must be adequately assessed within your submission (including within the socio-economic and landscape visual impact sections of the Environment Statement (ES)).

### **Other socio-economic impacts**

Additional burdens on local services are considered to be major adverse impact during operation in the PEIR, which would result from the increase in residence of operational workers in the district. This effect should be linked to the work to be carried out around the increase housing requirement in the district and neighbouring authorities (above in Housing Requirement section), to quantify the impact on local services as accurately as possible.

No mention is provided about an on-site education/training facility, as referenced in the Azimuth Associates report within the masterplan, overview report or PEIR, and therefore it is assumed that this will not form part of the submission. In terms of learning and development opportunities, these are broadly mentioned in the Azimuth Associates report, however not outlined in the Socio-Economic impacts section of the PEIR. It would therefore appear that there is limited weight that can be attributed to any beneficial impacts on learning and development from the project given this lack of detail about discussions with any providers and how any measures will be integrated into the project. Paragraph 13.9.7 indicates that specific surveys of the location and character of vulnerable groups and community facilities will be undertaken, with more details to be provided in the ES. We will await this information, and request that the potential for local employment and training during construction and operational phase be outlined in full in the ES and subsequently secured via appropriate obligations.

The tourism profile of the district provided within the PEIR should be updated to reflect available data on visitors from the 2015 Cambridge Economic Impact Model, further information can be found via: <https://www.visitthanetbusiness.co.uk/>. The Council has adopted its Economic Growth Strategy, which is referenced at PEIR section 13.4.27, however the Experian report from 2012 was not adopted and is not considered up-to-date. We welcome the acknowledgement of the potential significant impact on businesses from noise and traffic and transportation however this should be elaborated upon in the ES. The impact on tourism is characterised at operational stage as moderate adverse, and we await information on how the likely effects on local amenity, businesses, the destination and the experience of visitors will be mitigated by environmental measures. It is stated that this could be through limiting night flights and aircraft flightpaths, however all indicative flight paths would travel over Ramsgate, and night flight mitigation would not impact on the multiple flights during the day that could adversely affect local business and tourism and the destination.

### **Noise and impact on living conditions**

We are significantly concerned about the potential impact from your proposed development on the living conditions of those residential occupiers within close proximity of the airport, those residents living under the (indicative) flight paths, especially in relation to night flights, as well as disruption to multiple schools within Ramsgate. This impact has been characterised as major adverse – significant in the PEIR, and it is noted that further detailed assessment work is being carried out regarding construction and operational noise, including aircraft air noise which is pending further work on routes, aircraft type and specification. It will be necessary to consider the cumulative impact of existing aircraft operations in the vicinity, proposed airside operations as well as all training flights at the airport, and that this information should be submitted within the ES.

We would expect the final submission to include the full details of the proposed noise mitigation strategy as well as the noise insulation scheme (include those properties that you believe would be covered by the scheme on the basis of the information available at the time). It is noted that the document states that the noise contour map for the project will extend daytime and nighttime contours in comparison to the previously produced contour map for the previous use of the airport, but this is not being consulted on at this stage.

We would advise that an additional noise baseline observation location should be included within the Nethercourt residential estate, given its proximity to the airport and the anticipated landing/take off routes, as well as the approved Manston Green development location, with consideration of a permanent noise monitoring station on the site if any Development Consent Order (DCO) is approved.

Until the further assessment work has been completed and data made available we are unable to comment on whether the impacts have been adequately quantified and mitigated. We will therefore await this information before commenting in detail within the Council's Local Impact Report.

Notwithstanding the above concerns, if approved by the Planning Inspectorate we would expect that a Section 106 agreement would be formulated to cover all monitoring and mitigation for the use of the airport, with controls on noise levels, as well as controls on the number of night flights (capped at 8 movements as an absolute maximum given that this is the level to be assessed in the ES).

On a detailed layout point, the masterplan shows industrial buildings directly adjacent to residential properties on Manston Court road. The layout of this area should maximise the distance between industrial development and residential properties, with appropriate proposed use/heights/lighting to avoid harm to living conditions of those occupiers.

It is noted that the Secretary of State has required consideration of Vortex Strike arising from plane movements, but this has not been included in the noise assessment. We would welcome information on where this has been considered within the submission.

### **Landscape and Visual Impact**

The development would result in a highly urbanising effect of the landscape, due to the amount and height of the buildings proposed. Particular impacts will result from the new Air Traffic Control Centre building, 28metres above ground level, and hanger buildings and cargo facilities at 29m and 21m above ground level. The impact on residential and recreational visual receptors is acknowledged in the PEIR as significant. The number of viewpoints in Figure 11.2 appears to be limited for a development which could have a significant effect on Thanet's landscape, with no separate between short, medium or long range viewpoints. We would advise a number of additional viewpoints are added, at a minimum in the following locations:

- A viewpoint on Shottendane Road close to Minster Road, to show the landscape impact from Westgate
- A viewpoint (a256) on Haine Road (adjacent to eastern extent of the site), just south of the approved Manston Green layout.
- A viewpoint from Grinsell Road looking north.
- A viewpoint from Canterbury Road West adjacent to Jentex site (western side).
- A viewpoint on Manston Road between the two Museums,
- A viewpoint on Manston Road adjacent to Charles River site.

We are happy to provide further detail about the proposed locations above if necessary. In additional, the following points are made about the proposed viewpoint locations:

- Viewpoint 3 should be assessed at nighttime to visualise extent of light intrusion into landscape when viewed from the north on Vincent Road.
- Viewpoint 6 and new viewpoint above should include nighttime assessment.
- A viewpoint (a256) on Haine Road (adjacent to eastern extent of the site) should be selected, just south of the approved Manston Green layout.

The above should be included within the baseline of data utilised for the further assessments in the DCO. There is also a general lack of viewpoints to the south of the site, where the impact from the development on the designated landscape character areas in Thanet are defined as significant by the

PEIR. Whilst this partial relates to noise and aircraft movements affecting the character and tranquility of the area, there will be a visual impact from the structures proposed. Whilst the impact on visual receptors using the transport network has been considered to be “not significant”, we would suggest that a day/night viewpoint is selected on the A256 north bound when approaching the brow of the hill before descending to the roundabout with the A299. Some structures appear visible on the airport site from this road and therefore this should be assessed to ensure that the assessment currently provided in the PEIR is adequate and impact on this view quantified in the ES.

Whilst a baseline from the assessment of landscape has been produced for the PEIR, the results of this work at this stage does not appear to have informed the masterplan of the site, or this has not been explicitly outlined in the information, nor whether the further work in the ES will alter this layout at all. No mitigation measures are outlined, and we await the “Manston Airport Design Principles” document to assess the adequacy of the measures proposed.

The PEIR mentions a “Masterplan narrative” (RPS, February 2017) document, but this is not included and does not appear to be in the public domain as part of this consultation. It is assumed that this will form part of the “Manston Airport Design Principles” document.

It is noted that no assessment of the effects of lighting from the proposed development has occurred according to the PEIR, and we await further information on the impact on visual receptors from this element of the development.

### **Air Quality**

Aircraft emissions have been assessed within the PEIR, and indicate there will be no exceedance of the air quality objective for nitrogen dioxide or pm10 in the vicinity of the airport where existing background levels are low (taken from extensive Council baseline monitoring). However, by year 20 a rise of around 5ug/m3 is predicted at the nearest residential receptors and this is yet to include transport related emissions as these data are as yet unavailable. Therefore an emissions mitigation assessment must be provided in accordance with Thanet District Council Air Quality Technical Planning guidance 2016. The air quality assessment should also include flight training school operations, fire training (plume dispersal) and airside aircraft maintenance emissions. The assessment methodology was passed to Defra’s air quality helpdesk for comment as guided to by the LAQM TG16 Technical Guidance and their recommendation was for a full technical peer review.

The applicant should also consider installation of a permanent air quality monitoring station on approval.

A qualitative assessment of aircraft odour emissions given the history of odour complaints from the former airport use should also be provided in the ES.

### **Land Quality and Freshwater**

A draft Phase 1 Geo-environmental report has been completed (appendix 10.1) outlining the potential contaminants of concern based on the historic site uses. It is noted that breaking of aircraft at the former airport is not included and should also be added as a potential contaminant source within the conceptual model.

Additional reports referenced in the PEIR highlight complete pollutant linkages at the adjacent Jentex site and former airport bulk fuel installation. Accordingly, the Planning Inspectorate advised that ground investigation is required; with the scope and methodology to be agreed by the Environment Agency (including appropriate mitigation measures during any borehole construction to safeguard the Southern Water public abstraction) and the Council. The Phase 1 investigation states that a phased approach will be taken when considering the use of direct groundwater monitoring to minimise disturbance to the aquifer. In addition to EA requirements in relation to groundwater, the Council should be consulted regarding the scope of the proposed intrusive investigations, and any subsequent remediation requirements, as these are material planning considerations.

Within the PEIR significance evaluation for land quality, negligible magnitude of the adverse effects on human health and groundwater has been considered for the application site itself, with the proviso that appropriate investigation and mitigation will be undertaken to safeguard sensitive receptors. However, a number of 'site specific measures' will be required to address effective identification, protection, containment, attenuation, management and recovery of potential contaminants at the site during the construction and operational phases. These are yet to be agreed by the regulators.

Accurate assessment of the adverse effects on identified receptors is contingent upon appropriate containment and management measures being introduced at the site. With regard to the operational phase, it is stated that the project will use 'in-built (embedded design) mitigation' which will require sign-off by relevant regulators. An updated assessment based on these specific measures is therefore required.

Although the likelihood is low, impacts of a plane crash outside contained areas must also be considered as part of the PEIR. This has not been looked at in the preliminary significance evaluation and it is understood that further work is currently being undertaken by Amec Foster Wheeler to address this. Manston airport benefits from a particularly wide (and long) runway. However, the adverse effects for this scenario should be considered in conjunction with appropriate emergency and pollution response plans. These must have capacity to prevent potential spread of contamination (e.g. fuels and fire retardant foams), which could impact the public water supply or SSSI at Pegwell Bay following an incident; including possible damage to impermeable hardstandings.

Likewise, the magnitude of effects on human health from UXOs are described as negligible provided detailed threat and risk assessments are completed prior to groundworks. Additional precautions may need to be considered as part of the CEMP however as effects may be significant should unsuspected munitions be encountered during any digging operations. Further specialist advice is required regarding the UXO assessment and any necessary precautions.

We are aware that the location and design of fuel tanks for the proposed freight hub is still under discussion with the Environment Agency and Southern Water, including possible use of the Jentex site. This option will require redevelopment of the existing facility. EA Groundwater Protection Policies (March 2017) do not support the siting of bulk fuel farms within Groundwater Source Protection Zone 1. Therefore, the requirements for siting and options for above ground tanks must be explored with Environment Agency. A relevant Bristol airport case study is referenced in the PEIR and further details should be provided.

It is noted that a Construction Environmental Management Plan (CEMP) is to be submitted as part of the DCO to reduce effects of pollution from the construction phase. The CEMP must be informed by the findings of intrusive investigation work. Please note that any works must be carried in a strictly controlled manner to ensure that contaminants are not exposed and releases allowed to air, land or controlled waters, which could cause pollution, harm or nuisance. Construction works must also comply with the Control of Pollution Act 1974 (e.g. any works likely to cause nuisance to neighbouring properties must not commence prior to 8:00am with stated weekday working hours are 07:30-17:30hrs).

## **Historical Environment**

Kent County Council (KCC) and Historical England have been consulted on the proposal, and these bodies are key consultees and their expertise should be relied upon.

In relation to the impact on heritage assets, there may be non-designated heritage assets not identified in the Kent County Council Historic Environment Record which could be affected by the proposal, and the assessment criteria should make provision for these potentially being identified through the DCO process.

Any harm arising from new buildings or building increasing in scale should consider the potential alteration of design, form or siting of the proposed development to mitigate any impacts, as additional planting or screening as suggested in unlikely to be effective.

The approach to the use of photomontages for the visual representations of the levels of possible harm should be agreed with the Council as well as Historic England.

From the PEIR, it appears that you seek to rely upon information from trial trenching carried out in support of the current planning application for the redevelopment of the airport site to assess future studies. It is important to note the agreed trial trenching was connected to the proposed layout of that scheme, with no trial trenching on the northern grass area. Given the extent of development on the section of land within your proposal, it is considered highly likely that you will be required to carry out your own trial trenching in this location to support your DCO submission, however we defer to KCC to comment.

### **Traffic and Transportation**

KCC will comment on the impact from the development on the highway network, and their expertise should be relied upon.

We are concerned about the potential impacts on the network surrounding the site from both construction and operational phase given the likely level of traffic generated by the proposed development, especially regarding Spitfire Way, Spitfire Junction and Manston Court Road. At this stage in the process there is insufficient information to consider these impacts. We therefore await further information about the scope of the transport assessment, which should including any additional housing requirement (see Economic impacts section), the methodology for distributing trips on the network and physical improvements to the network as well as mitigation measures in due course.

We request that we are directly involved in coordinating the list of committed development to be included within the future baselines with KCC. An assessment of the impact from the proposed development on the Thanet Transport Strategy must also be included within the submission, which should also be taken into account when agreeing modelling scenarios with KCC.

As previously stated, we believe that operational and junction capacity assessment should be included within the ES.

### **Biodiversity**

KCC, Natural England and Environment Agency will comment as key consultees on the impact from the proposal on biodiversity and their expertise should be relied upon.

### **Other matters**

The summary of the proposal includes an Aircraft Teardown facility as a “key component” of the project, however this does not appear to be mentioned at all in any of the documentation, including the site masterplan and the PEIR, and therefore it appears that you are not consulting on it at this stage. Despite that it is worth noting our concern with this proposal given the historic use of the site and enforcement action taken against similar operations previously due to potential contamination. It is imperative that more information is provided at the earliest stage to the local community about this facility, how it will operate. This should include but not be restricted to how fuels and other harmful or toxic materials will be removed from airplanes during breaking. We advise early discussions with the Environment Agency on this element of the project. On the basis of no information being provided about the facility, we are concerned about the need, viability and operation of such a facility within a Groundwater Source Protection Zone.

Within the PEIR, the assessment of cumulative impact is based upon a list of committed development which does not include the outline planning permission under reference OL/TH/11/0910, for the site known as Eurokent (approval for up to 550 houses and up to 63,000 sqm commercial floorspace with retail and community facilities) nor does it include the approval under reference OL/TH/14/0040 for up to 785 houses, primary school and community hall on the site known as Manston Green, which is directly adjacent to the eastern boundary of the airport site. Both of these must be included and taken into account within the PEIR, especially when considering the impact on the transportation network and on living conditions of future residents from the proposed development. Additional sites may be required for inclusion when the ES is finalised.

## **Conclusion**

There are potentially significant detrimental environmental and amenity impacts on Thanet and its local community from the development. Therefore with regard to the public consultation we await further information following the completion of the required survey and investigatory work. However, particular concern is raised that the ramifications for the emerging Thanet Local Plan have not been adequately quantified, and there is a lack of information relating to delivery of the project.

If the DCO and compulsory acquisition is successful, you will be required to work with the Council as the host authority, when dealing with detailed matters for the project. We are extremely disappointed that you have been unwilling to enter into a Planning Performance Agreement (PPA) with Thanet District Council, our neighbouring authorities Dover District Council and Canterbury City Council in East Kent and KCC, to allow us to ensure that adequate resources for handling the NSIP process are available and to encourage joint working between the applicant and statutory consultees. We would welcome the opportunity to do this through a PPA.

The above comments are made without prejudice to the Council's written representation submission, adequacy of consultation and local impact report on the Development Consent Order application.

Yours sincerely



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**Planning Applications Manager**