

OFFICIAL – SENSITIVE

MANSTON PLANNING PROPOSAL STATEMENT

RAF Manston

Home Office

September 2025



**CUSHMAN &
WAKEFIELD**

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1. Introduction

- 1.1 This Assessment has been prepared by Cushman & Wakefield (C&W) on behalf of the Home Office (HO) ('the Applicant') in support of a Planning Proposal for an application to be made to the Secretary of State for Urgent Crown Development pursuant to sections 293b and 293c of the Town and Country Planning Act 1990 ('the 1990Act'). The provisions for Urgent Crown Development were introduced through the Levelling Up and Regeneration Act 2023 ('LURA 2023'). The Application seeks consent for the grant of retrospective planning permission for development comprising an Initial Triage Processing Centre ('ITPC') and to grant planning permission for new development to comprise the Manston Reception Centre ('MRC') and a Training facility (together the 'Proposed Development') at the former at the former RAF Manston, Manston Road, Ramsgate, Kent, CT12 5BS (hereafter the 'Site'). The Site comprises the former RAF site at Manston, Kent and has an extant lawful use for the purposes of Class C2A (secure residential institutions) of the Use Classes Order 1987 (as amended) ('UCO.'). The lawful use of the site was provided in advice given by Greg Jones KC in December 2021 prior to the Home Office taking occupation of the site.
- 1.2 Since the ITPC was set up in December 2021, the Home Office has relied on the extant lawful use of the site, however no permitted development rights have been relied upon for any operational development that has taken place in the intervening period, with the exception of demolition of buildings and structures. These have relied on Part 11 Class B of the Town and Country Planning (General Permitted Development) (England) Order 2015, as amended ('GPDO').
- 1.3 The Home Office has relied on the Short Term Holding Rules 2018 (as amended in 2022) to control the operations at the Site. Details of how they are being applied is set out in Section 5 of the Manston Planning Proposal Statement ('MPPS').
- 1.4 A full description of development is set out in section two of this statement.
- 1.5 The Manston Planning Proposal ('MPP') comprises the following plans and documentation:

Plans submitted for approval:

- Site Location Plan 'for approval' - Drawing No. 050836-9834-ATR-ZZZ-XX-DR-A-0001-S4-D0100 P05
- Parameter Plan Development Zone and Maximum Building Heights – 'for approval' - Drawing No. 050836-9834-ATR-ZZZ-XX-DR-A-0350-S4-D0100 P012
- Parameter Plan Security Fence and Access 'for approval' - Drawing No. 050836-9834-ATR-ZZZ-XX-DR-A-0356-S4-D0100 P06

Documents submitted for approval

- Planning Proposal Statement
- Travel Plan Framework
- Transportation Assessment (Highways Position Statement appended)
- Outline Construction Environmental Management Plan

Plans submitted for information

- Existing Site Plan – Baseline Prior to December 2021 - for approval' - Drawing No. 050836-9834-ATR-ZZZ-XX-DR-A-0150-S4-D0100 P10
- Parameters Plan: Existing accommodation, facilities and groundworks – March 2025 - 'for information' - Drawing No. 050836-9834-ATR-ZZZ-XX-DR-A-0151-S4-D0100 P08
- Parameter Plan Demolition Future Phases - Drawing No. 050836-9834-ATR-ZZZ-XX-DR-A-0251-S2-D0100 P08
- Demolition Plan Phase 1 Completed (Dec 2023) Demolition 'for information' - Drawing No. 050836-9834-ATR-ZZZ-XX-DR-A-0250-S4-D0100 P08

Documents submitted for information accompanying the Planning Proposal:

- Air Quality Assessment
- Arboricultural Impact Assessment, including Tree Protection Plans
- Archaeological Desk Based Assessment
- Badger Survey (Confidential)
- Bat Survey
- Bird Survey
- Botany Survey
- Climate Change Resilience Assessment
- Contamination and Drainage Position Statement (Appended to Planning Proposal Statement)
- Cumulative Effects Assessment
- Dover A20 Supplementary Air Quality Assessment
- Drainage Feasibility Report
- Ecological Appraisal Report
- Ecological Constraints and Opportunities Plan
- Ecological Impact Assessment
- EIA Screening Request (Pts 1 and 2)
- Energy and Sustainability Statement
- Engagement Report
- Flood Risk Assessment
- Geophysical Survey Technical Note
- Geotechnical Desk Study
- Great Crested Newt Survey
- Ground Investigation Report
- Habitats Regulations Assessment Stage 1 Screening Report
- Healthcare Position Statement (Appended to Planning Proposal Statement)
- Human Health Impact Assessment
- Landscape and Visual Impact Assessment
- Landscape Strategy
- Lighting Assessment
- National Security Statement
- Noise and Vibration Impact Assessment
- Operational Management Plan including Appendices A - C (Confidential)
- Operational Waste Management Strategy
- Outline Construction Traffic Management Plan
- Outline Remediation Strategy Approach
- Radiological Remediation of Section of the Former RAF Manston Site
- Socio-Economic Impact Statement

- Statement on National Importance and Urgency (Confidential)
- Topographical Survey
- Utilities Survey
- Unexploded Ordnance (UXO) Risk Assessment
- UXB Clearance Surveys
 - UXB Map of 3D Analytic Signal Amplitude
 - UXB Map of Residual Magnetic Field Strength
 - UXB Summary Interpretation Plan

- 1.6 The Manston Planning Proposal ('MPP') has adopted a Rochdale Envelope approach and assesses maximum parameters to ensure the worst-case scenario has been assessed. This approach was adopted to provide flexibility in the design and implementation stages, whilst ensuring that the environmental impacts of the MPP were thoroughly assessed. Approval of detailed design is envisaged through relevant approvals pursuant to the planning consent granted via the Urgent Crown Development Route.
- 1.7 References in this Manston Planning Proposal Statement to the ITPC relate to the facility that was stood up in December 2021 and that will continue to operate until the new MRC is constructed. The current operation is reliant on a number of temporary structures and infrastructure provision. References to the MRC relate to the purpose-built facility for which consent is sought. Both the ITPC and the MRC fulfil the same function.

Why is the Manston Processing Centre and Training Facility Needed?

- 1.8 The Home Office uses the site for the initial reception and processing of people arriving by small boat. It is vital that there is an appropriate facility where those individuals can be securely detained, while their identity and other details are collected and verified. It is vital, that the Home Office has the infrastructural capability to bring those who arrive at the UK irregularly (by any route) into the immigration system rapidly. The Home Office uses the site for the initial reception and processing of people arriving by small boat. It is vital that there is an appropriate facility where those individuals can be securely detained, while their identity and other details are collected and verified.
- 1.9 Further details on the Site Selection process are set out in Section 7 of this Planning Proposal Statement.

The Proposed Planning Route

- 1.10 The Home Office is submitting a planning proposal via the Urgent Crown Development route which became available from May 2025.
- 1.11 As part of the Levelling-up and Regeneration Act 2023 (LURA) a new route to securing planning permission for Nationally Important Crown Development was introduced into the Town and Country Planning Act 1990. This allows an 'appropriate authority' (the applicant), to apply directly to the Secretary of State for planning permission where the proposed development is of national importance.
- 1.12 A special procedure where development is of national importance and needed as a matter of urgency, 'Urgent Crown Development', was updated through the LURA. This allows the appropriate authority to apply directly to the Secretary of State where development is both of national importance and needed as a matter of urgency, and applications will be subject to a simplified procedure.

- 1.13 A separate statement setting out the reason why the proposal at Manston is both nationally important and urgent has also been submitted.

Structure of Planning Proposal Statement

- 1.14 This report is structured as follows:

- Section 2 – Description of Proposed Development
- Section 3 – Permitted Development
- Section 4 – Stakeholder Engagement
- Section 5 - Management of the MRC
- Section 6 – Planning History
- Section 7 – Relevant Legislation and Planning Policies
- Section 8 – Planning Considerations
- Section 9 – Technical Considerations
- Section 10 – Environmental Assessment
- Section 11 – Conclusions

2. Description of Development

Site and Surroundings

- 2.1 The Site is the former RAF Manston and is in northeast Kent on the Isle of Thanet. The Site is located approximately 5km northwest of Ramsgate and is situated immediately northeast of Manston Road (B2050) from which the Site is accessed. There are two secondary accesses, one to the east of the main access and a second in the northwest corner of the site adjacent to the former Fire control Building.
- 2.2 The former RAF airfield is situated approximately 20m south, the RAF Manston History Museum and Spitfire and Hurricane Memorial Museum is situated to the immediate southeast, the Charles River Laboratories are located to the immediate east of the Site, agricultural fields and farms are located to the north, and a residential estate and discrete business are situated approximately 15m west of the site. The wider landscape is mainly agricultural land with the urban areas of Margate and Ramsgate to the east.
- 2.3 The Site area measures approximately 37.6 hectares (ha) and is located within the Thanet Villages Ward of Thanet District Council within the jurisdiction of Kent County Council.
- 2.4 At the time that the ITPC was set up, the Site had 105 buildings and structures previously in use by the RAF and latterly by the Fire Service Training Establishment for the Ministry of Defence and an Army Reserve Unit and Air Cadet Squadron from 2017 until 2021. A total of 16 buildings/building groups were demolished during Phase 1 demolition works, leaving 89 buildings/structures on site. Since the Home Office set up the ITPC in December 2021 some of the existing buildings have been used for overnight residential accommodation known as Residential Holding Rooms ('RHRs'), medical centre, interview suite, security base and training facility. The Site includes a number of car parking areas, areas of existing hardstanding, estate roads and large areas of grassland to the east, with scattered trees throughout. Adjacent to the eastern boundary of the Site is a communications tower that is fenced off from the wider site, with a vehicular gate to the south for the purpose of accessing the tower. The communications tower is currently operational and is owned by the MoD. In the south-west corner of the site fronting Manston Road (B2050) and set within mature gardens is the former Commandant's House.
- 2.5 The nearest bus stop is located on Spitfire Way (Manston Museum) and is served by Service Nos. 11, 48 and 48A. Eastbound services go to Ramsgate, Dumpton and Birchington-on-Sea, whilst Westbound services go to Manston, Birchington-on-Sea, Manston Business Park and Canterbury, however the bus services are infrequent. There are no local amenities within walking distance of the site, however there are a number of rail stations within a 20 minute cycle ride from the Manston site.

Description of the Proposed Development

- 2.6 The Home Office is seeking planning permission using the Urgent Crown Development Route. The summary description of development is as follows:

Retrospective Development¹

Retrospective planning permission for operational development provided in connection with the Initial Triage and Processing Centre. This includes marquees for accommodation of service users and associated services, refurbishment and reuse of existing buildings provided in connection with Initial Triage and Processing Centre including the barrack and mess blocks for interview facilities and holding facilities (known as the Residential Holding Rooms RHRs, and erection of an eight cell temporary confinement unit. Provision of catering or dining facilities, toilet or washing facilities, laundry facilities, worship and religious observance facilities, medical facilities, office and administrative facilities, warehousing and storage, and facilities for those carrying out police and security activities. Engineering works associated with the provision of foul and surface water drainage, provision of temporary generators, installation of additional lighting. Closed Circuit Television and fencing. Remediation works to remove historic asbestos associated with former use of the site. Creation of temporary parking facilities for 150 vehicles, gatehouses, and hard and soft landscaping,

Proposed Development

Use

A maximum of 1,600 service users will be on the site at any one time. The site will be used for triaging and processing service users comprising of single adult males, single adult females and families, training facilities for and on behalf of the Home Office, for national security facilities / operations and as a base for Border Force personnel.

Demolition

Demolition of existing buildings and structures on site to be undertaken in phases. Phase 1 demolition as detailed in drawing entitled Demolition Plan – Phase 1 Completed Dec 2023. Future phases of demolition as detailed in the Parameters Plan entitled Demolition Plan – Future Phases.

New Development

New development to include urgent temporary modular buildings, permanent modular building²s using modern methods of construction,, extensions to existing buildings and refurbishment works up to a maximum height of 12m. The maximum development area will be 108,982 sq.m GEA. The development will comprise an arrivals and reception centre, Short Term Holding Unit, ancillary administrative facilities, communal services including indoor and outdoor recreation facilities, catering and dining facilities, laundry, medical facilities, worship and religious observance facilities, storage and warehousing, staff accommodation and gatehouse. New training facilities both temporary and permanent including classrooms, erection of aircraft fuselages and vehicle simulators.

Operational Development

Operational development works required in connection with the permanent use of the site as the Manston Reception Centre to triage and process services users, Training Facility and Border Force base including engineering works associated with the provision of foul and surface water drainage, including new waste water treatment centre, solar panels to roofs of buildings, provision of temporary generators, installation of additional lighting and Closed Circuit Television, fencing up to 6m in height, creation of internal roads and hard surfacing areas for parking of cars and operational vehicles up to a maximum of 800 spaces, substations and associated landscaping.

¹ Retrospective development – all new development that has occurred on the site since HO took occupation of the site in December 2021 and up to March 2025.

2.7 Below is a detailed description of development. The maximum proposed parameters of the MPP are as follows:

- Maximum number of service users: 1,600
- Maximum development area 108,982 sq.m GEA (*retrospective floorspace plus proposed development floorspace*)
- Maximum building heights: 12 metres
- Maximum fence heights: 6 metres
- Maximum area of solar panels: 7,750 sq.m

2.8 Table 1 sets out the Summary of Floorspace.

Table 1 Manston Reception Centre – Summary of Floorspace Area

Baseline Dec 2021	Floorspace area sqm GEA
Total building footprint area	22,847
Total	22,847
Demolition Phase	Floorspace area sqm GEA
Phase 1 Completed Dec 2023	2,620
Demolition 2025	4,330
Future demolition	1,041
Total	7,991
Total Gross Proposed Development	Floorspace area sqm GEA
Retrospective development since Dec 2021 – March 2025	
Short Term Holding Unit	215
Short Term Holding Unit Hardstanding	1,061
New Office Block	1,510
Marquees	8,109
Car Parking	11,550
Portacabins	230
Total	22,675
Proposed New Development	
MRC	29,728
Training Facility	2,528
Car parking	29,190
Training Facility Hardstanding	13,546
Area Pre-gatehouse	1,921
Water Treatment Plant (below ground)	2,655
Total	86,307
Total Proposed Retrospective Development and Total Proposed New Development	108,982
Total Net Development	Floorspace area sqm

Total Proposed New Development – total demolitions	78,316
Total Net Development	Floorspace area sqm
Total Gross Proposed Retrospective Development + Proposed New Development – total Demolition	100,991

Detailed Description

Use of the Site

- 2.9 The Home Office plans to build a more efficient and fit-for-purpose processing centre, with protection of the local community's safety given the same high priority as now. The Manston site is a highly suitable, available location for processing large volumes of people arriving irregularly into the UK, due to its location, accessibility and privacy of the site.
- 2.10 The Site is currently being used as an ITPC and the MPP provides for a Manston Reception Centre (MRC) that will replace the ITPC. Also proposed is a new Training facility – initially a temporary facility is proposed, which will in time be replaced with a permanent facility. The Site is, and will continue to be used as a base for Border Force personnel.
- 2.11 It is important that the MRC is an appropriate and fit for purpose facility, where arriving people can be securely detained, screened and triaged, within 24 hours (or 96 hours, in the case of those detained in residential holding room accommodation) while their identity and circumstances are ascertained). Medical, catering and rest facilities will also be required.
- 2.12 The Site only accommodates single adult males, single adult females and families. Irregular migrants who claim to be unaccompanied minors when they arrive at Western Jet Foil will be age assessed. If they are assessed to be an adult they will be routed to Manston ITPC/MPC as normal, and if they are assessed as being under the age of 18 years they will be routed to Kent Intake Unit. Kent Intake Unit provides accommodation and support to newly arrived unaccompanied asylum-seeking children in Kent.
- 2.13 The control of the site is governed by the Short Term Holding Facility Rules 2018 amended by the Short Term Holding Facility (Amendment) Rules 2022 and the Detention Services Orders and this will continue when the new facilities are opened. Further details in relation to the operation and control of the site is detailed in Section 5 of this Planning Proposal Statement.

Healthcare Provision

- 2.14 With regards to healthcare, the provision is and will be managed by appropriately qualified teams under a healthcare supplier at both the Western Jet Foil, Dover and the Manston sites. Healthcare will be a combination of on-site and off-site provision should it be necessary; all Primary health care needs will be met at Manston. If there is a need for specialist medical intervention, the individual will be transferred to local hospital for the necessary medical treatment. The demand for health provision will be monitored, to ensure that no significant effects upon local healthcare infrastructure.
- 2.15 Healthcare service provision includes and will continue to be provided as part of the permanent facility:

- Initial assessment upon arrival to the Site including infectious diseases
 - First aid (24/7 provision).
 - Treating acute medical needs (e.g. chemical burns, hypothermia) that could become life threatening.
 - Underlying conditions, including communicable diseases, traumatic injuries, pregnancy, mental health and other vulnerabilities.
 - 2 Emergency Department (ED) consultants and a medical director from the current Healthcare service provider, in addition to paramedics, Healthcare Assistants (HCAs) and technicians to ensure less reliance on the local hospitals.
 - Provision of commonly prescribed medicines.
 - Low – level trauma informed mental health support service.
 - Confidential health advice (including sexual health and substance misuse).
 - Medical screening to be completed by qualified Nurses under Rule 30 and Rule 32 for all individuals in accordance with the Short Term Holding Facilities Rules.
- 2.16 The Site is designed to be self-sufficient and all primary healthcare will be provided onsite. Suppliers and Healthcare professionals at both Western Jet Foil and Manston must deliver high quality healthcare including during periods of peak demand and must retain sufficient flexibility to meet seasonal variations. This is delivered through a Flexible Staffing Model (core staff plus surge staff) together with a workforce contingency plan that makes provision for locum staff.
- 2.17 Emergency doctors and paramedics are available 24 hours a day, 7 days a week within the Tempest Building. The Healthcare Position Statement submitted in support of the Planning Proposal sets out current staffing levels both day and night.

Retrospective Development

- 2.18 Retrospective planning permission is sought for development undertaken since December 2021 to allow the ITPC to operate effectively and comprises marquees for Short Term Holding Facilities ('STHF') which accommodate all arrivals, unless they are housed in a Residential Holding Room ('RHR') located in the former barrack blocks on site. The ITPC previously comprised of 30 marquees in June 2023. At the time of writing in September 2025, the number of marquees has been reduced to a total of 14 marquees used as STHFs. The number of marquees is due to be reduced to a total of 12 marquees by the end of December 2025. The Short-Term Holding Facility (STHF) is legally classified as a "holding room" where services users are held for up to 24 hours, unless a longer period of detention is authorised by the Home Secretary.
- 2.19 There are separate STHFs for single adult males, single adult females and families. STHF marquees for single adult males or single adult females each hold up to 150 arrivals. STHFs marquees for families accommodate up to 100 arrivals.
- 2.20 The STHFs provides the following facilities:
- Showers and toilets
 - prayer rooms
 - laundry facilities
 - TVs
 - blankets
 - heating and cooling
 - hot and cold drinks, snacks,
 - access to a telephone,
 - access to health care professionals and medical facilities including accommodation for those being treated in isolation

- provision of three meals a day.
- Indoor and outdoor recreational facilities

- 2.21 In family marquees there are additional facilities including a quiet room baby changing and nursing room. Baby changing products, formula milk and activities for children are also provided.
- 2.22 The ITPC previously comprised 30 marquees in June 2023. This will be reduced to 12 marquees by the end of 2025. The ITPC currently comprises of the following temporary buildings and structures that will be removed once the permanent replacement buildings have been constructed:
- Temporary marquees for short-term holding/processing (14 No.) (up to a period not exceeding 24hours)
 - Temporary search marquee (1No.) (9m x 15m)
 - Temporary surge marquees for welfare facilities (2No.) (27m x 9m and 30m x 9m)
 - Temporary marquee for dining facilities (1No.) (39m x 9m)
 - Temporary mobile toilet blocks for services users and staff (22 No.) (4m x 3m)
 - Temporary mobile shower units for service users and staff (4No.) (4m x 3m)
 - Temporary shipping containers for storage for use by service users, staff and contractors (37 No.)
 - Temporary Vaccination trailer to be used for vaccinating service users (1no.)
- 2.23 The specification of the temporary buildings, ranges from c39m in length and c9m in width to c4m in length to c2.5m in width. The maximum height of the units is 4m depending on the type/model used. The largest unit is the dining facility which is c39m x 9m.
- 2.24 Since the start of the use of the Site in December 2021 a two storey modular block has been constructed for use as offices. This will be retained as part of the MRC facility.
- 2.25 A Short Term Holding Unit has also been constructed in the northern part of the site and will be retained as part of the MRC.
- 2.26 Refurbishment of existing buildings provided in connection with the ITPC also include the refurbishment and reuse of the barrack blocks and mess blocks for interview facilities, Residential Holding Rooms (RHRs), healthcare facilities, office and storage accommodation, and the creation of 150 additional temporary parking spaces ('the Vulcan car park').
- 2.27 The RHRs are STHFs that can detain a person for a period of not more than 96 hours (unless a longer period is authorised by the Home Secretary in exceptional circumstances up to a maximum of five additional days). Neither the STHF Rules, nor guidance defines 'exceptional circumstances' in this context but is likely to include, but not limited to, the timing of their return flight, unexpected delays to their return flight, removal directions being set for a point shortly after the 24 hour stage, a very high number of arrivals in a short period, escort availability or escort delays (in the case of individuals awaiting transfer to an Immigration Removal Centre). The time for detention in an RHR can also be extended if mandatory inspections by Border Force have not been completed.
- 2.28 The RHRs provide individual rooms with beds, a communal rest area and larger outside recreation space. Medical facilities are available including facilities for those being treated in isolation. Access to meals and food is the same provision as is given to those held in STHFs. The RHRs are provided across 6 barrack blocks each holding up to 48 individuals with a capacity of up to 288 people.

- 2.29 The refurbishment works forms part of the continuous upgrade of the Site and to date works undertaken have included the following:
- Fabric surveys
 - Internal renovation and strip out, fabric fit out and compartmentalisation
 - Water testing, chlorination/cleaning systems
 - Upgrade and extension of fire detection and alarm systems
 - Fire precaution improvements including additional compartmentation, new fire doors, fire stopping and protected means of escape.
 - Replacement and upgrade to kitchen in combined mess
 - Heating system upgrade
 - Lighting upgrade
 - Installation of flooring
 - Building and installing furniture
 - Upgrades to flooring, electricals, partitioning of rooms, new sinks in medical centre
- 2.30 The existing buildings on site are being refurbished and repurposed for MRC operational purposes ranging from processing areas, interview facility, holding, medical, storage, hospitality, training.
- 2.31 The Home Office will ensure that all works comply with relevant legislation and the Building Regulations prior to the buildings becoming operational.
- 2.32 Internal refurbishment works do not require planning permission, however the information provided above sets out the range of refurbishment works that have taken place to date.
- 2.33 Retrospective permission is also sought for engineering works associated with the provision of foul and surface water drainage, provision of temporary generators, installation of additional lighting, CCTV and fencing, other security measures related to the operation of the facility, temporary fencing and 150 temporary car parking spaces. Further details are provided below.
- 2.34 Temporary generator sets have been provided to power the temporary marquees. There are currently 11 electrical generators on site which are hired by the Home Office's facilities management contractors supply chain via specialist suppliers who provide a complete and comprehensive maintenance service. Refilling is arranged via the FM contractor. Each generator has its own 3,500 litre diesel fuel tank which is compliant with fuel storage regulations. No other substances of material quantity are stored on site.
- 2.35 Temporary surface-mounted waste (sewage) tanks have been provided for drainage to the toilets and showers within the temporary marquees. Retrospective consent is sought for this infrastructure provision.
- 2.36 The MPP also seeks retrospective consent for trenching undertaken in order to extend existing utilities and services on the Site.
- 2.37 New CCTV and lighting have been provided along boundary fence, and to internal fenced zones to improve security and retrospective consent is sought for this infrastructure. Where required signage has been erected throughout the Site.
- 2.38 The IPTC has also provided within the Site seating, refuse bin and other small scale infrastructure. Where required landscaping works have been undertaken (hard and soft) to facilitate the IPTC operations.

Demolition

- 2.39 Demolition of existing buildings and structures on the site will be phased. Phase 1 was completed in 2023. An application was made by Cushman and Wakefield on the 27th June 2023 (Application Ref: DM/TH/23/0876) to Thanet District Council to determine whether Prior Approval was necessary for the demolition of Phase 1 Buildings as identified on Drawing No. Drawing 050836-9834-ATR-ZZZ-XX-DR-A-0250-S2-D0100 Rev P08 (Buildings 36, 37, 39, 41, 42, 43, 44, 84, 85, 239, 282, 547, 547A, 595, 604, 605, 606 removal of dog kennels and removal of tennis court). The buildings removed comprised of redundant buildings that had been out of use for a number of years and were not suitable for re-use, such as garages, storage facilities and office accommodation. The Council confirmed that Prior Approval was not required. Phase 1 demolition works were completed on the 11th December 2023. The details of Phase 1 demolition are set out here for context and no retrospective consent is sought in respect of these demolition works.
- 2.40 Future phases of demolition and relevant commencement dates are still to be confirmed but are likely to take place in late 2025. A further application was made by Cushman and Wakefield on the 17th December 2024 (Application Ref: DM/TH/24/1457) to determine whether Prior Approval was necessary for the demolition of a further 5 No. buildings as identified on Drawing No. 050836-9834-ATR-000-GF-DR-A-0250-S2-D0-100 Rev P08. The buildings are former barrack blocks and Officers mess with ancillary buildings and structures related to their operation. The Council confirmed on the 4th February 2025 that prior approval was not required. As detailed on Drawing No. 050836-9834-ATR-000-GF-DR-A-0250-S2-D0-100 Rev P08, there may be a requirement to demolish further buildings in the future. The buildings identified for potential demolition are as follows:
- Building No 033 Training Tower
 - Building No. 841 Store
 - Building No. 004 H Block – Old HQ offices
 - Building No. 045 Plant Room
 - Building No. 010 Blues and Twos and Fitness Gym
 - Building No. 131 Temporary Laundry/Storage
 - Building No. 044A Part of Blues and Twos

Proposed Development

- 2.41 The MPP in assessing the impacts of both the ITPC and the MRC has adopted a worst case assumption that the construction phase of the MPP (MRC and Training Facility (temporary and permanent)) will be concurrent with construction of the scoped in Reasonably Foreseeable Future Projects (RFFPs – see Section 8 for further details). The ITPC will remain operational throughout the construction of the MPP. Once the MRC is completed, all temporary marquees (currently 18) will be removed and decommissioned.

Proposed Refurbishment

- 2.42 As part of the ongoing upgrade and re-purposing of the Site, further refurbishment and extensions to existing buildings are proposed as part of the MPP. The maximum floorspace figures are summarised in Table 1. The provision within the description of development for extensions is to give the Home Office maximum design flexibility but to date none have been constructed. The range of activities that are likely to take place are identified above under the description of retrospective development. Not all future refurbishment works will require planning permission where they are either internal or part of general maintenance works.

Proposed New buildings

Modular Build

- 2.43 Replacement of temporary marquees with temporary modular builds (modular buildings are over 200m³ and would not fall under Permitted Development). The existing marquees are currently in use as holding rooms for service users for up to 24 hours. These are in urgent need of replacement and will be replaced by the temporary modular buildings which will be introduced as a matter of urgency to provide the essential infrastructure required at the site whilst the new permanent reception centre and training facility are under construction. The temporary modular units would provide an urgent interim solution until the permanent facility is completed. Once the permanent facility is operational the temporary modular units may be repurposed.

Manston Reception Centre

- 2.44 A fit for purpose infrastructure utilising modern methods of construction, known as the Manston Reception Centre (MRC) for the initial triage and processing of up to 1600 service users comprising of single adult males, single adult females and families. The MRC will comprise of the:

- The Arrivals and Processing Centre building which will be the initial processing space for the arrivals where Service Users will undergo the appropriate administrative and biometric checks. This building will also include office space for the onsite operational command teams.
- The Short-Term Holding Facility (STHF) 24 hour holding rooms where the arrivals will be held prior to their onward journey to other accommodation, Immigration detention or removal from the country. It is proposed that there will be a maximum of 4 blocks, and it is proposed that the Dispersal facility, where service users will be taken for onward journeys offsite, will be included within the STHF.
- Interview rooms where the arrivals will be interviewed to determine the validity of their asylum claims.
- Provision of ancillary administrative facilities,
- Communal services including indoor and outdoor recreation facilities (external exercise space will be adjacent to the STHF), catering and dining facilities, toilet and washing facilities, laundry, pastoral care including multi-faith facilities, medical facilities including accommodation for those being treated in isolation, storage for service users and staff.
- Residential accommodation facilities for staff. The Home Office has acquired the former Commandant's House in the south-west of the site and it is envisaged that this would be used to provide ancillary staff accommodation in the future, although the exact proposals for this is not yet known. The planning consent should provide sufficient flexibility to allow this building to be used as either a single C3 dwelling, or communal staff accommodation.
- A gatehouse at the southern front entrance and car parking provision for all onsite staff and operational vehicles (800 parking spaces) plus 41 motorcycle and 30 cycle parking spaces is to be provided to support the MPP.
- Facilities for those carrying out police and security activities.

Training Facility (Temporary and Permanent)

- 2.45 Proposals for a temporary training facility and permanent training facility form part of the MPP. Currently there are no training facilities of this type on the Site.
- 2.46 The temporary staff training facilities are required as a response to the urgent timescales to erect a suitable training facility to meet the Home Office training needs, notably for Escorting staff. The temporary training facility would consist of a 6No. marquees each 30m x 9m

containing a mixture of tuition classrooms and physical training rooms. Separately 3 x aircraft fuselages and vehicle simulators would be provided.

2.47 The temporary facility would be able to accommodate up to 100 trainers and trainees at any one time. The location and configuration of the temporary training facility and permanent training facility has not been confirmed through detailed design. It is anticipated that the temporary training facility will be located on the sports ground area as identified on Map 1 Botany Survey. The temporary training facility will be replaced by the long-term training facility in the same location.

2.48 Externally the permanent facility will provide the following:

- Vehicular parking to provide spaces for 39 operational vehicles and 4 coaches.
- Provision (in line with Manston site guidance) for electrical charging points.
- Provision of a designated smoking area – subject to alignment with Manston smoking policy
- External rest area i.e., Pub style picnic tables.
- 4m wide tarmac roadways to each aircraft fuselage access point from the training facility. Also a covered area to house vehicle simulators within 10m of the fuselages. The tarmac roadways will provide a weatherproof access route for staff and delegates to access the fuselages in a safe manner.

2.49 Internally the following facilities will be provided for staff and trainees:

- Reception area
- Locker area
- Toilets, Showers and changing facilities
- Stand down area for the delegates
- Instructors Stand down and rest area
- Offices for Admin / management
- Secure storage area
- Meeting Rooms
- Multifaith prayer area
- IT and Telephony
- Maximum of 6 classrooms within the facility for practical skills sessions
- Maximum of 1 classroom on an aircraft fuselage.
- Maximum of 7 Dojos'

2.50 The permanent training facility will accommodate a maximum of 144 staff including those facilitating the training and those being trained.

2.51 The training facility also includes new perimeter 3.85m high palisade fencing to secure the facility, provision of new CCTV cameras and a gated entrance to the facility.

2.52 Decommissioning details of the temporary facility will be provided at a future date and could be the subject of a suitably worded condition.

Proposed Operational development

2.53 The Operational development works required in connection with the use of the site as the MRC to process migrants, and Training Facility include engineering works associated with the provision of foul and surface water drainage, including provision of any requirement for new waste water treatment centre, temporary generators, installation of additional lighting and CCTV, roof top solar panels, fencing up to 6m in height, creation of internal roads and hard surfacing areas for parking of cars and operational vehicles up to a maximum of 933 spaces for all typologies, substations and associated landscaping.

2.54 *Engineering Works* – the following engineering works are proposed as part of the MPP:

- Site clearance and ground works
- Earthworks required to level existing site and make suitable for development plateau
- Foundations for MRC accommodation and ancillary services
- Provision of concrete bases for lighting poles, temporary generators, sub stations
- Trenching for utilities, services and drainage. Any existing facilities on Site which are not proposed to be used will be made secure and fenced off
- Removal of ground contamination including asbestos and radiation
- Intrusive investigation and removal of UXO's, if required

2.55 Water and Drainage Infrastructure: Surveys have been carried out to identify the utilities infrastructure serving the Site and across the Site. A drainage CCTV survey has been undertaken to establish the condition and capacity of the existing surface and foul drainage infrastructure. More detailed surveys will continue to be progressed throughout detailed design development. Designs for utilities infrastructure serving the new development will take account of the existing infrastructure condition and the capacity requirements and limitations agreed with the statutory utility operators.

2.56 The following works will be undertaken within the Site to provide suitable water and drainage infrastructure for the MRC and Training facility:

- Removal or diversion of services
- Connection to existing water supplies and extension of the supplies to the new facilities
- Construction of new surface water attenuation and infiltration system for the management and discharge of surface water to ground within the Site
- Connection to existing main sewer for the discharge of foul water and/or construction of new wastewater treatment plant(s) serving the new facilities for the management and discharge of treated water to ground within the Site (subject to relevant approvals)

2.57 The provision of a Waste Water Treatment Plant on the site would be a fallback position should Southern Water not upgrade their sewer network in time for the operational use of the MRC. Southern Water has confirmed that it would need 24 months to upgrade the network, however further discussions with them can only take place once planning consent is granted. If an onsite solution is required this will be a temporary packaged sewage treatment plant which will discharge grey water into underlying ground. The details of all the options considered for foul water are set out in Section 5 of the Drainage Feasibility Report submitted with the proposal. The use of the temporary onsite Waste Water Treatment Plant should Southern Water not complete upgrades in time for the new processing facility is supported by the Environment Agency and Southern Water. Apart from the general location of a temporary facility on the site no further details are available.

2.58 Energy - The following works will be undertaken within the Site to meet the energy demands of the MRC and Training facility:

- New Primary and Intake substation comprising Primary substation to house DNO owned equipment providing a 11kV incoming main; and private substation to house Client owned equipment that will originate and distribute a new private 11kv ring)
- 10 distribution sub stations
- Roof top solar panels are to be provided and will extend to a maximum of 7,750 sqm across MRC buildings.

2.59 Design feasibility of the MRC and Training Facility has confirmed the electrical supply requirements. Liaison with the DNO (UKPN) is ongoing to bring increased electrical capacity to

the site. The location of the primary substation and the 10 distribution substations is currently indicative only.

- 2.60 There may be the potential requirement for temporary generators prior to the installation of the new sub stations.
- 2.61 It is likely that only minor breaking of ground will be required in order to provide concrete bases to accommodate the temporary generators and substations for the MRC and Training Facility.
- 2.62 Waste – site wide - As part of the operation of the MPP, the following provisions will be made in respect to waste.
- 2.63 During the construction phase, materials will be managed and minimised as far as possible, in compliance with the Waste Hierarchy through methods of waste prevention, segregation, reuse and recycling, whenever possible.
- 2.64 Medical and clinical waste will be handled and disposed of in accordance with applicable regulations set out in:
- The Environmental Protection Act 1990
 - The Hazardous Waste (England and Wales) Regulations 2005
 - The Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2009
- 2.65 Clinical waste will be segregated from all other waste arisings and will be collected by licensed waste management facilities who will appropriately dispose of the waste. All collections will have a Hazardous Waste Transfer Note signed by the producer and the Vendor to allow the waste to be removed from the location and the transfer note is then signed at the disposal site to say it has been received. This ensures that the waste is fully tracked. These documents need to be kept for three years should the Environment Agency need to see the records.
- 2.66 If detected, hazardous waste will be managed and taken off-site by licensed contractors for disposal at an appropriately licensed waste management facility.
- 2.67 Waste generated during the operational phase of the proposed development will be collected and disposed of by licensed waste management contractors. Waste storage areas will be provided in order to store both recyclable materials and general waste arisings.
- 2.68 Security - The MPP will have new boundary fencing of up to 6m in height, with vehicular access around the site for service and emergency vehicles. The main access and egress to the site will be via the Manston main site entry along the eastern section of Manston Road.
- 2.69 Existing CCTV access points will be revised. Additional fixed position CCTV attached to and in existing buildings and new CCTV will be installed on new modular units. CCTV to be installed at each entrance/exit gate.

Car Parking

- 2.71 Construction Traffic – an Outline Traffic Management Plan is submitted in support of the MPP, however details of how construction traffic will be managed including routes and numbers of vehicles will be detailed in the full Construction Traffic Management Plan. This will include all detailed mitigation measures to manage the impacts of construction traffic. At the time of the submission of the MPP this information is not yet available.
- 2.72 Operational Traffic including the numbers of vehicles and requirements for staff car parking, operational vehicle parking and visitor parking are detailed in the Transport Assessment and Travel Plan which accompany the MPP.
- 2.73 Table 2 below sets out a summary of the parking provision and Full Time Equivalent (FTE) staffing.

	Total Car parking spaces	Total Vehicle parking spaces (operational vehicles)	Other parking	Staff employed (FTE)
Retrospective: Temporary Initial Triage and Processing Centre	624 car parking spaces			
Proposed: Permanent Processing facility	800 car parking spaces	21 vehicle parking spaces 4 coach parking spaces	41 motorcycle parking spaces 30 cycle parking spaces	1055
Proposed: Permanent Training Facility		37 vehicle parking spaces		144

Table 2 – Parking provision and FTE staff employed

3. Permitted Development

- 3.1 Notwithstanding the description of development applied for as part of the Manston Planning Proposal, the Home Office requires that the planning consent includes a provision that retains permitted development rights as set out in the Town and Country Planning (General Permitted Development) (England) Order 2015 (the GPDO).
- 3.2 Specifically the following rights are considered to be relevant to the Site and should be retained:
- Part 1 (development within the curtilage of a dwellinghouse)
 - Part 2 Minor Operations
 - Part 4 Temporary buildings and uses
 - Part 10 repairs to services
 - Part 11 Heritage and Demolition
 - Part 13 Water and Sewerage
 - Part 14 Renewable Energy
 - Part 15 Power related development
 - Part 16 Communications
 - Part 18 Miscellaneous development
 - Part 19 Development by the Crown or for national security purposes
 - Class A General Development by the Crown
 - Class B Extension of alteration of an operational Crown building
 - Class C Developments on operational Crown land
 - Class D Hard surfaces for operational Crown buildings
 - Class K Use of land by the Crown in relation to surveys etc
 - Class Q Development by the Crown relating to an emergency
 - Class QA Development by the Crown relating to a pandemic
 - Class R Erection of gates, fences etc by the Crown for national security purposes
 - Class S Closed circuit television cameras for national security purposes
 - Class T Electronic communication apparatus etc for national security purposes
- 3.3 The retention of the above permitted development rights would provide the Home Office with flexibility in the future to undertake small scale development projects not foreseen at the time of the submission of the Planning Proposal.

4. Stakeholder Engagement

- 4.1 An Engagement Report (Cushman & Wakefield, March 2025) is submitted in support of this planning proposal. The report explains, with evidence, how the Home Office has engaged with stakeholders (including landowners as well as neighbouring residents) about the proposed development. It summarises the process by which engagement has taken place, outlines the key meetings and discussions, and the actions resulting from these. Specifically, where changes have been made to the proposal and, where changes have not been made, the reasoning behind the decision.
- 4.2 Although there is no requirement to consult before submitted an application for Urgent Crown Development, MHCLG will consult the local planning authority and statutory consultees during the decision making process. Further, in the interest of the community, the UK Government undertook early engagement with specified groups and individuals identified as having an interest in the site commencing in summer 2023. Community engagement took place for 3 weeks between September -October 2024 and is detailed in the Engagement Report.
- 4.3 As part of the technical assessment of the MPP relevant statutory consultees have been consulted as detailed in the Engagement Report. Although the new training facility will be built on a former playing field, this has not been in use for well over 5 years and as such it was considered unnecessary to consult with Sport England in line with Schedule 4z) of the Town and Country Planning (Development Management Procedure) (England) Order 2015. This states that Sport England should be consulted for development which:
- i. Is likely to prejudice the use, or lead to the loss of use, of land being used as a playfield; or
 - ii. Is on land which has been –
 - (aa) used as a playing field at any time in the 5 years before the making of the relevant application and which remains undeveloped; or
 - (bb) allocated for use as a playing field in a development plan or in proposals for such a plan or its alteration or replacement; or
 - iii. Involves the replacement of the grass surface of a playing pitch on a playing field with an artificial, man-made or composite surface
- None of the above criteria are applicable in this instance and therefore there is no requirement to consult Sport England.
- 4.4 The Engagement Report concludes that the key themes that have emerged from the engagement work are policy and land use, traffic and transport, health and wellbeing, policing and community safety, environmental and heritage impacts, as well as community engagement.
- 4.5 Following any grant of planning consent, the Home Office will look to progress further stages of communications and engagement with key stakeholders. The aim of ongoing and future engagement is to keep local residents and property/business owners, elected representatives, local authorities and other statutory bodies and technical engagement partners updated on the progress of development of the Manston site.
- 4.6 This will include regular meetings with Thanet District Council and Kent County Council, as well as continuing to update the local MP and District and Parish Councillors. Engagement will continue with the Multi-Agency Forum to share plans with wider public sector partners including the Police, Fire Service and NHS. The Home Office will also continue to update the Independent Monitoring Board Chair responsible for the Manston site to ensure they are informed as to the progression of developments on the site.

- 4.7 As part of the engagement the Home Office has also met with River Oak Strategic Partners Ltd and Kent County Council to establish ways of delivering highway improvements at the Spitfire Way/B2050 Manston Road junction. The principles have been agreed by the parties in respect of the disposal of land and the provision of proportionate financial contributions to KCC as the Local Highway Authority to support the delivery of highways improvements to the existing Spitfire Way/B2050 Manston Road junction (see Appendix 1).
- 4.8 The Home Office is reviewing how and when to share updates with the local community going forward but is committed to updating the community as and when plans for the site are further developed and ahead of any construction.

5. Management of the MRC

5.1 The following section provides information on the overall management of the ITPC and MRC including admissions and screening process, communication with service users, health and wellbeing of service users and staff, domestic operations, health and safety, security, fire risk and details of action proposed for fostering good relations.

5.2 The ITPC and the future MRC are governed by the Short-Term Holding Rules 2018 (as amended in 2022). The Rules set out how particular aspects of the STHF are to be appropriately managed. Amendments were made to the rules in respect to 'residential holding rooms' by way of The Short Term Holding Facility (Amendment) Rules 2022. We set out below some of the key rules that have informed the management of the facility and have drawn out the distinctions of how the Rules are applied generally to those in Holding Rooms compared with those in Residential Holding Rooms.

5.3 Rule 13 – Accommodation

STHF Holding Room – sufficient accommodation to be provided which is to be certified as adequate for health in terms of its size, lighting, heating, ventilation and fittings, as well as allowing individuals to communicate with staff at any time.

5.4 Rule 14 – Sleeping Accommodation

Residential Holding Rooms – individuals must be provided with separate sleeping accommodation from detained persons of the opposite sex, where possible.

5.5 Rule 15 - Families and Minors

STHF Holding Room – Detained family members in STHFs are able to enjoy family life at the facility, allowing them to eat and / or socialise together. This must be consistent with the need to maintain security and safety and therefore if, for example, one family member posed a risk of harm to other members of the family this requirement can be overridden. A detained person that is detained and responsible for a person under 18 should be provided with everything reasonably necessary for their protection, safety, well-being, maintenance and care.

Residential Holding Rooms – In addition to the above rules, detained families and unaccompanied minors under the age of 18 in residential STHFs must be provided with sleeping accommodation that cannot be accessed by unrelated, detained adult individual. Families and unaccompanied minors under the age of 18 should be prioritised for processing whenever possible, in order to reduce the likelihood of these individuals being transferred to a residential holding room, or alternatively to ensure that they are detained in the residential holding room for as short a period as possible.

5.6 At Manston one of the existing barrack blocks is currently being refurbished to provide bespoke family accommodation for families detained in residential holding rooms.

5.7 Rule 16 – Clothing

The Rule for both type of holding facility permit individuals to wear their own clothing whilst detained, provided that the clothes are suitable and clean, with arrangements to supply sufficient clean clothing from outside of the STHF where required. If required, a detained person must be provided with clothing adequate for warmth and health in accordance with arrangements approved by the Secretary of State.

5.8 Rule 20 – Time in open air

The rule provides that a detained must be given the opportunity to spend at least one hour in every 24 in the open air. Time in the open air may be refused in exceptional circumstances where necessary in the interests of the security of the short-term holding facility or the safety of the detained person or other persons.

5.9 Rule 23 – Outside contacts

STHF Holding Room – a detained person may enjoy visits from, or communication with, a person living outside a short-term holding facility in accordance with rules 24 (correspondence) 25 (visits), 28 (use of telephones) and Part 6 (persons having access to short term holding facilities). However, a detained person is not permitted to be visited by, or have communications with a person living outside the short-term holding facility to the extent to which the visit or communication would prejudice the interests of the security of the short-term holding facility or safety of the detained person or other persons.

Residential Holding Room – A detained person may enjoy communications with a person outside a short-term holding facility in accordance with Rule 28 (use of telephones, except where this would be contrary to the interests of security or safety

5.10 Rule 30 – Medical Screening

STHF Holding Room – requires a detained person to be screened by a healthcare professional within two hours of admission to a STHF.

Residential Holding Room- requires that individuals must be screened by a healthcare professional within 24 hours of admission to a RHR, except where this is not possible due to exceptional circumstances

5.11 Manston has on site health care staff on site and all arrivals are medically screened by a health care professional prior to entry to a holding room.

5.12 Rule 31 – General Medical Care

STHF Holding Room – the rule is concerned with ensuring that detained individuals have access to a healthcare professional defined as a registered medical practitioner or registered nurse.

Residential Holding Room - requires a detained person if they become ill or sustain an injury to have prompt access to a healthcare professional, and any arrangements made for supervision, care, or transfer to hospital, if necessary.

5.13 Manston has healthcare facilities on site and therefore in practice they should be generally able to deal with most healthcare needs of service users.

Rule 32 – Special Illnesses and conditions

STHF Holding Room – requires that healthcare professionals should report cases where any detained person is likely to be injuriously affected by their continued detention in a short-term holding facility or any conditions of detention, an individual who may have suicidal intentions or an individual who may have been a victim of torture.

Residential Holding Room –if during medical screening the health care professional identifies any immediate risk to the individual's health, the health care professional must notify the manager of the risk and any arrangements must be made in accordance with rule 31. The manager must ensure that the individual's detention is reviewed as soon as practicable.

At Manston there are internal processes in place to ensure that any such concerns are promptly raised.

- 5.14 The following paragraphs set out some of the key themes in regarding the day to day management of Manston.
- 5.15 Accommodation and support services at Manston will be managed by the Small Boats Operating Command (SBOC) Operations team and the onsite Immigration Officers (contractors) responsible for the day to day running of the facility. The primary inflow into the facility will be from new small boat arrivals from Western Jet Foil. Service Users generally only remain on site for a maximum of 24 hours, or in some cases 96 hours to ensure that detention laws and short-term holding rules (2018) are complied with.
- 5.16 The Home Office will be responsible for the overall governance of the site and have a team in place to manage the delivery of services supplied by Care and Custody team (contractor).
- 5.17 The use of the site has been detailed in Section 2 of this report. The following text seeks to supplement that information to provide an overview as to how the site will be managed during operation.

Employee Training

- 5.18 All staff and contractors on site will be required to complete a range of training as relevant including (but not limited to) manual handling; first aid; health and safety essentials; equality, diversity and inclusion; fire awareness; counter terrorism awareness; mental health awareness; and safeguarding adults and children.

6. Planning History

- 6.1 Following a desktop search of the site's planning history, six planning applications are listed on the council's website. Council's online records date back to 2002 and there are none listed earlier than 2007.
- 6.2 The planning applications summarised below relate to minor scale development. The Council's earlier records generally provide little detail and, in some instances, decision notices have not been uploaded. Of the decision notices which have been uploaded, there does not appear to be any planning conditions which would interfere with the existing and proposed use of the site as an immigration processing facility.
- 6.3 An EIA Screening request is submitted to MHCLG as part of the Manston Planning Proposal. The Manston EIA Screening Report concludes that no significant cumulative effects are anticipated from the proposed development both in isolation (intra-scheme effects) and acting together with relevant Reasonably Foreseeable Future Projects (RFFPs) (inter-project effects) (see Section 8 for further details). The EIA Screening Report concludes that on this basis there is no requirement for additional mitigation or enhancement measures to be proposed.

Reference	Description	Determined	Relevant Conditions
DM/TH/24/1457	Application for prior notification of proposed demolition of 5 No. buildings	Prior Approval Not Required 4 February 2025	1. Development to be completed in accordance with details submitted 2. Development to be carried out within 5 years
DM/TH/23/0996	Application for prior notification of proposed demolition of 5No. buildings	Withdrawn, 1 Aug 2023	N/A
DM/TH/23/0876	Application for prior notification of proposed demolition of 6No. buildings	Prior Approval Not Required, Wed 26 Jul 2023	N/A
DM/TH/14/1110	Application for prior notification for the demolition of single storey building	Prior Approval Not Required, Thu 08 Jan 2015	No information available
F/TH/08/0870	Erection of 2No. five meter high street lighting columns, RAF Manston Fire Training House	Approved, Mon 08 Sep 2008	N/A
F/TH/08/0508	Erection of a 5 meter high street lighting column, RAF Manston Fire Training House	Approved, Fri 06 Jun 2008	N/A
F/TH/07/1452	Erection of a two storey fire training house	Approved, Mon 10 Dec 2007	N/A

Table 3 – Planning History

7. Relevant Legislation and Planning Policies

- 7.1 This section sets out the legislative and planning policy context relevant to the Manston Proposal. There is no statutory requirement for the decision maker to consider compliance with the development plan, however it is considered that to ensure a robust planning decision is reached that consideration of the planning merits is a sensible approach.
- 7.2 The proposal under consideration, if successful, would grant permission in principle for Manston to continue to be operated as an Initial Triage Processing Centre (temporary) and the proposed development of Manston Reception Centre (MRC), and a training facility.

Legislation

- 7.3 As part of the Levelling-Up and Regeneration Act 2023 (LURA) a new route to securing planning permission for Nationally Important Crown Development was introduced into the Town and Country Planning Act 1990. Sections 293B) and 293C) provide for a special procedure where an ‘appropriate authority’ can apply for permission from the Secretary of State for development of national importance and needed as a matter of urgency – Urgent Crown Development.
- 7.4 Section 293B sets out the relevant procedures for applicants making an application under this route, and Section 293C provides details on how such decisions are to be made by the Secretary of State. Immigration Rules Part 11:Asylum (paragraphs 326A to 352H) provide that an ‘application for asylum (or an ‘asylum application’) is a claim by a person to be recognised as a refugee under the Refugee Convention on the basis that it would be contrary to the United Kingdom’s obligations under the Refugee Convention for them to be removed from or required to leave the United Kingdom, and which is recorded a valid or a claim deemed to be an application for asylum in accordance with paragraph 327EC.
- 7.5 An ‘asylum applicant’ is someone who makes a claim under paragraph 327(i) or who is deemed to have made such a claim in accordance with paragraph 327EC.
- 7.6 The power to detain must be exercised in the interests of maintaining an effective immigration control. However, there is always a presumption in favour of release and that, wherever possible, alternatives will be used to detention. Detention is most usually appropriate in the following situations:
- To effect removal
 - Initially to establish a person’s true identity or the basis of their claim
 - Where there is reason to believe that the person will fail to comply with any conditions attached to the grant of immigration bail
 - Where there are national security concerns of considerations.
- 7.7 Paragraphs 16 (1), (1A) and (2) of Schedule 2 to the Immigration Act 1971 give powers to an immigration officer to authorise detention pending examination or further examination for a decision on the grant, refusal or cancellation of leave, pending the giving of removal directions and pending the removal of the person from the UK.
- 7.8 In order to be lawful, immigration detention must be for one of the statutory purposes for which the power is given and must accord with the limitations implied by domestic and the European

Convention on Human Rights (ECHR) case law. Detention must also be in accordance with the government's stated policy on immigration detention.

- 7.9 Detention must be used sparingly and for the shortest period necessary. It is not an effective use of detention space to detain people for lengthy periods if it would be practical to effect detention later in the process, for example once any rights of appeal have been exhausted if that is likely to be protracted and/or there are no other factors present that arguing more strongly in favour of detention. All other things being equal, a person who has an appeal pending or representations outstanding might have relatively more incentive to comply with any restrictions imposed, if released, than one who does not and is imminently removable.
- 7.10 There are two types of facility at Manston: the Manston holding room (referred to as the Short-Term Holding Facility in the planning proposal documents. This has existed since the site was first set up at Manston. The second type of facility is the Manston Residential Holding Room (referred to as the RHR Barrack blocks in the planning proposal documentation). The STHF Rules 2018 provide for the 24-hour holding room time limit, to be extended in 'exceptional circumstances, whilst the STHF (Amendment) Rules 2022 similarly provide for the RHRs 96-hour time limit to be extended in 'exceptional circumstances'. The maximum extendable period is a 5-day time limit that applies to detention in residential short-term holding facilities. Appendix 4 sets out the STHF Rules and their applicability to Manston.
- 7.11 Detention Service Orders (DSOs) provide mandatory instruction and operational guidance for all Home Office staff and contracted service providers working in Immigration Removal Centres (IRCs) and Holding and Residential Holding Rooms (HRs and RHRs). These Orders set out the processes to ensure compliance with the requirement of the STHF Rules 2018. DSOs are operational instructions all of which are published externally on Gov.UK.

Local Planning Policy

- 7.12 The site at the former RAF Manston falls within the administrative area of Thanet District Council, the Development Plan for Thanet District Council comprises the Thanet Local Plan (adopted 9 July 2020).
- 7.13 The National Planning Policy Framework (2024) and Guidance, and Supplementary Planning Documents (SPDs) are material considerations in the determination of planning applications for the development of the site.

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Policy SP24 - *Development in the Countryside*

- 7.14 The Policy states that development on non-allocated sites in the countryside will be permitted for either:
- 1) the growth and expansion of an existing rural business;
 - 2) the development and diversification of agricultural and other land based rural businesses;
 - 3) rural tourism and leisure development;
 - 4) the retention and/or development of accessible local services and community facilities;
- or
- 5) the redevelopment of a brownfield site for a use that is compatible with its countryside setting and its surroundings.

Isolated homes sited in the countryside will not be permitted unless they fall within one of the exceptions identified in the National Planning Policy Framework.

- 7.15 All development proposals to which this policy applies should be of a form, scale and size which is compatible with, and respects the character of, the local area and the surrounding countryside and its defining characteristics. Any environmental impact should be avoided or appropriately mitigated.

Policy SP26 - Landscape Character Areas

- 7.16 The Policy states that the Council will identify and support opportunities to conserve and enhance Thanet's landscape character and local distinctiveness.
- 7.17 Development proposals should demonstrate how their location, scale, design and materials will conserve and enhance Thanet's local distinctiveness, in particular:
- 1) Its island quality surrounded by the silted marshes of the former Wantsum Channel and the sea;
 - 2) A sense of openness and 'big skies', particularly in the central part of the District;
 - 3) Its long, low chalk cliffs and the sense of 'wildness' experienced at the coast and on the marshes;
 - 4) Gaps between Thanet's towns and villages, particularly those areas designated as Green Wedges;
 - 5) Long-distance, open views, particularly across the Dover Strait and English Channel, North Sea and across adjacent lowland landscapes; and
 - 6) Subtle skylines and ridges which are prominent from lower lying landscape both within and beyond the District.
- 7.18 Development proposals should demonstrate how they respect and respond to the character, key sensitivities, qualities and guidelines of the relevant landscape character areas, as detailed in the Landscape Character Assessment (LCA) and summarised below.
- 7.19 All development should seek to avoid skyline intrusion and the loss or interruption of long views of the coast and the sea, and proposals should demonstrate how the development will take advantage of and engage with these views.
- 7.20 Development should generally be directed away from the Stour Marshes (E1), Wade Marshes (E2) and Pegwell Bay (F1) character areas (as detailed in the LCA), as these are largely undeveloped and key to retaining the island character of Thanet. The undeveloped character of Landscape Character Type F: Undeveloped Coast should also be maintained.
- 7.21 Proposals on the coast (within landscape character types F: Undeveloped Coast and G: Developed Coast and the surrounding area) should respect the traditional seafront architecture of the area, maintain existing open spaces and should ensure that recreational and wildlife opportunities are not compromised by development. Proposals should maintain and enhance the setting of sandy bays, low chalk cliffs and associated grassland and long sweeping views of the coastline.
- 7.22 The rural-urban boundary is distinctive in some parts of Thanet, particularly where there is an abrupt urban edge and where the countryside extends into the urban areas as Green Wedges. The distinction between town and countryside should be retained.

- 7.23 Development proposals that conflict with the above principles will only be permitted where it can be demonstrated that they are essential for the economic or social well-being of the area. In such cases, landscape impacts should be minimised and mitigated as far as possible.

Policy SP27 - Green Infrastructure

- 7.24 All development proposals should, where possible, safeguard Thanet's Green Infrastructure network and enhance it by integrating new multifunctional Green Infrastructure provision in the design of developments. Opportunities to improve Thanet's Green Infrastructure network by protecting and enhancing existing Green Infrastructure assets and the connections between and providing new Green Infrastructure assets should be identified early in the design process for major developments, together with consideration of how they will be managed and maintained in the long term.
- 7.25 Development should make a positive contribution to Thanet's Green Infrastructure network wherever possible and appropriate, by the incorporation, provision or fulfilment of those matters and objectives set out in paragraph 4.39 [of the Plan].

Policy SP30 - Biodiversity and Geodiversity Assets

- 7.26 The Policy states that development proposals will, where appropriate, be required to make a positive contribution to the conservation, enhancement and management of biodiversity and geodiversity assets resulting in a net gain for biodiversity assets through the following measures:
- 1) the restoration / enhancement of existing habitats,
 - 2) the creation of wildlife habitats where appropriate, by including opportunities for increasing biodiversity in the design of new development,
 - 3) the creation of linkages between sites to create local and regional ecological networks,
 - 4) the enhancement of significant features of nature conservation value on development sites,
 - 5) protect and enhance valued soils,
 - 6) mitigating against the loss of farmland bird habitats.
- 7.27 Sites should be assessed for the potential presence of biodiversity assets and protected species. For sites where important biodiversity assets, including protected species and habitats including SPA functional land, or other notable species, may be affected, an ecological assessment will be required to assess the impact of the proposed development on the relevant species or habitats. Planning permission will not be granted for development if it results in significant harm to biodiversity and geodiversity assets, which cannot be adequately mitigated or as a last resort compensated for, to the satisfaction of the appropriate authority.

Policy SP34 - Provision of Accessible Natural and Semi-Natural Green Space, Parks, Gardens and Recreation Grounds

- 7.28 The Policy states that the Council will require suitably and conveniently located areas of usable amenity space, adequate to accommodate the demands for passive recreation generated by residential development. New greenspace provision should, where possible, be linked to existing greenspace, Green Wedges and/or the wider countryside and public rights of way network, away from the coast, to maximise its value. Such provision should seek to enhance the opportunities for biodiversity.

- 7.29 Sites allocated as Strategic Housing Sites will be required to provide natural and semi natural green space and local parks, formal gardens, allotments and recreation grounds to meet the standards set out in Table 12. Natural and Semi-natural green space will be expected to improve the biodiversity potential of the area
- 7.30 The Council will expect appropriate arrangements for maintenance and management to be made. The responsibility for which will be vested in a particular individual, or, subject to commuted payment to meet such costs, in the district, town or parish council. Such arrangements will be secured by entering into a planning agreement.
- 7.31 Any areas of accessible natural and semi natural green space, parks, gardens and recreation grounds created by virtue of this policy will be protected from development by Policy SP32 - Protection of Open Spaces and Allotments.

Policy SP35 - Quality Development

- 7.32 The Policy states that new development will be required to be of a high quality and inclusive design as set out in Policies QD01 and QD02. Developers may be required to seek an independent Design Review for all major development proposals, and any proposals regardless of size in prominent locations or which are likely to have a significant visual impact.

Policy SP36 - Conservation and Enhancement of Thanet's Historic Environment

- 7.33 The Council will support, value and have regard to the historic or archaeological significance of Heritage Assets by:
- 1) protecting the historic environment from inappropriate development;
 - 2) encouraging new uses where they bring listed buildings back into use, encouraging their survival and maintenance without compromising the conservation of the building or its historical or archaeological significance;
 - 3) requiring the provision of information describing the significance of any heritage asset affected and the impact of the proposed development on this significance;
 - 4) facilitating the review of Conservation Areas and the opportunities for new designations;
 - 5) recognising other local assets through Local Lists;
 - 6) offering help, advice and information about the historic environment by providing guidance to stakeholders, producing new guidance leaflets, reviewing existing guidance leaflets and promoting events which make the historic environment accessible to all;
 - 7) issuing Article 4 Directions which will be introduced and reviewed as appropriate;
 - 8) supporting development that is of high quality design and supports sustainable development.

All reviews and designations will be carried out in consultation with the public in order to bring a shared understanding of the reasons for the designation and the importance of the heritage asset.

Policy SP37 - Climate Change

- 7.34 New development must take account of the need to respond to climate change:

- 1) by minimising vulnerability and providing resilience to the impacts of climate change through the use of up to date technologies, efficient design and appropriate siting and positioning of buildings;
- 2) mitigating against climate change by reducing emissions and energy demands through the use of up to date technologies;
- 3) realise and make best use of available opportunities to reduce the impact of climate change on biodiversity and the natural environment by providing space for habitats and species to move through the landscape and for the operation of natural processes, particularly at the coast.

Policy SP38 - Healthy and Inclusive Communities

- 7.35 The Policy states that the Council will work with relevant organisations, communities and developers to promote, protect and improve the health of Thanet's residents, and reduce health inequalities.

Proposals will be supported that:

- 1) bring forward accessible community services and facilities, including new health facilities;
- 2) safeguard existing community services and facilities;
- 3) safeguard or provide open space, sport and recreation;
- 4) promote healthier options for transport including cycling and walking;
- 5) improve or increase access to a healthy food supply such as allotments, farmers' markets and farm shops;
- 6) create social interaction and safe environments through mixed uses and the design and layout of development;
- 7) create greener neighbourhoods and improve biodiversity and access to nature.

Policy SP43 - Safe and Sustainable Travel

- 7.36 The Policy states that the Council will work with developers, transport service providers, and the local community to manage travel demand, by promoting and facilitating walking, cycling and use of public transport as safe and convenient means of transport. Development applications will be expected to take account of the need to promote safe and sustainable travel. New developments must provide safe and attractive cycling and walking opportunities to reduce the need to travel by car.

Policy SP45 - Transport Infrastructure

- 7.37 The Policy states that development proposals will be assessed in terms of the type and level of travel demand likely to be generated. Development will be permitted only at such time as proper provision is made to ensure delivery of relevant transport infrastructure. Where appropriate, development will be expected to make a proportionate contribution to the provision, extension or improvement, of walking and cycling routes and facilities and to highway improvements. Subject to individual assessments, schemes may be required to provide or contribute to:

- 1) capacity improvements/connections to the cycle network;
- 2) provision of pedestrian links with public transport routes/interchanges;
- 3) improvements to passenger waiting facilities;
- 4) facilities for display of approach time information at bus stops along identified quality bus corridors;
- 5) improvement and expansion of public transport services;

- 6) improvements to the road network in line with schemes identified through the transport strategy;
- 7) provision of electric vehicle charging points, in accordance with policy SP14.

Policy SP47 - Strategic Routes

- 7.38 The Policy states that the following areas, as shown on the Policies Map, are safeguarded for the provision of key road schemes and junction improvements, to support the implementation of the Thanet Transport Strategy, including land at:

- 1) Birchington strategic housing site
- 2) B2050 Manston Road, Birchington
- 3) Shottendane Road (from Birchington to Margate)
- 4) Shottendane Road-Manston Road - Hartsdown Road housing site
- 5) Nash Road-Manston Road housing site
- 6) Nash Road, Margate
- 7) Nash Road-Westwood strategic housing site
- 8) Manston Court Road/Star Lane (from Haine Road, Westwood to B2050 Manston Road)
- 9) From Columbus Way to Manston Road, Birchington

The following strategic routes are sufficient in their existing form to provide for the growth envisaged in the Plan) (subject to the Local Plan review process set out in Policy SP03).

- 7.39 However, if further development is permitted, including further development at Manston Airport, which has a material impact on the capacity or operation of these routes, the Council will require alternative on-site highway provision where appropriate and/or proportionate contributions towards any improvements or changes to the existing routes which is thereby necessitated:

- 1) B2050 Manston Road (from Manston Court Road to Spitfire Junction
- 2) B2190 Spitfire Way (from Spitfire Junction to Columbus Avenue junction).

- 7.40 Junction/traffic management improvements are required at the following junctions to ensure the fully effective functioning of the Inner Circuit. Development that compromises the ability to deliver such improvements will not be permitted:

- 1) Victoria Traffic Lights
- 2) Coffin House Corner Traffic Lights

- 7.41 The Council expects all new development to make a proportionate contribution to the provision of this key infrastructure. In the event that there is any delay in site acquisition or assembly in relation to any of the schemes identified in Policy SP47, the Council will, in conjunction with the County Council, make interim highway arrangements to enable allocated development schemes to proceed.

Policy QD01 - Sustainable Design

- 7.42 All new buildings and conversions of existing buildings must be designed to reduce emissions of greenhouse gases and have resilience to function in a changing climate. All developments will be required to:

- 1) Achieve a high standard of energy efficiency to the equivalent of Level 4 of the Code for Sustainable Homes (subject to HE05 where applicable). Where viability is an issue, it will be incumbent on an applicant to demonstrate to the satisfaction of the Council why this standard cannot be achieved.

- 2) Make the best use of solar energy passive heating and cooling, natural light, natural ventilation and landscaping.
- 3) Provide safe and attractive cycling and walking opportunities to reduce the need to travel by car.

All new buildings and conversions of existing buildings must be designed to use resources sustainably. This includes, but is not limited to:

- 4) Re-using existing buildings and vacant floors wherever possible;
- 5) Designing buildings flexibly from the outset to allow a wide variety of possible uses;
- 6) Using sustainable materials wherever possible and making the most sustainable use of other materials;
- 7) Minimising waste and promoting recycling, during both construction and occupation

Policy QD02 - General Design Principles

- 7.43 The Policy states that the primary planning aim in all new development is to promote or reinforce the local character of the area and provide high quality and inclusive design and be sustainable in all other respects. Development must:
- 1) Relate to the surrounding development, form and layout and strengthen links to the adjacent areas.
 - 2) Be well designed, respect and enhance the character of the area paying particular attention to context and identity of its location, scale, massing, rhythm, density, layout and use of materials appropriate to the locality. The development itself must be compatible with neighbouring buildings and spaces and be inclusive in its design for all users.
 - 3) Incorporate a high degree of permeability for pedestrians and cyclists, provide safe and satisfactory access for pedestrians, public transport and other vehicles, ensuring provision for disabled access.
 - 4) Improve people's quality of life by creating safe and accessible environments, and promoting public safety and security by designing out crime.
- 7.44 External spaces, landscape, public realm, and boundary treatments must be designed as an integral part of new development proposals and coordinated with adjacent sites and phases. Development will be supported where it is demonstrated that:
- 5) Existing features including trees, natural habitats, boundary treatments and historic street furniture and/or surfaces that positively contribute to the quality and character of an area should be retained, enhanced and protected where appropriate.
 - 6) An integrated approach is taken to surface water management as part of the overall design.
 - 7) A coordinated approach is taken to the design and siting of street furniture, boundary treatments, lighting, signage and public art to meet the needs of all users.
 - 8) Trees and other planting is incorporated appropriate to both the scale of buildings and the space available, to provide opportunities for increasing biodiversity interest and improving connectivity between nature conservation sites where appropriate.
- 7.45 Residential development on garden land will be permitted where not judged harmful to the local area in terms of the character and residential amenity, the intrinsic value of the site as an open space is not considered worthy of retention, and will not conflict with any other requirements of other design policies and Policy HO1.

Policy QD03 - Living Conditions

7.46 The Policy States that all new development should:

- 1) Be compatible with neighbouring buildings and spaces and not lead to the unacceptable living conditions through overlooking, noise or vibration, light pollution, overshadowing, loss of natural light or sense of enclosure.
- 2) Be of appropriate size and layout with sufficient usable space to facilitate comfortable living conditions and meet the standards set out in QD04.
- 3) Residential development should include the provision of private or shared external amenity space/play space, where possible.
- 4) Provide for clothes drying facilities and waste disposal or bin storage, with a collection point for storage containers no further than 15 metres from where the collection vehicle will pass.

Policy QD04 - Technical Standards

7.47 The Policy states that all new development will be expected to meet the new technical standards as follows:

- 1) internal space standards as set out in Table 13;
- 2) water efficiency standard of 110litres/person/day.

Policy G105 – Protection of Playing Fields and Outdoor Sports Facilities

7.48 This policy does not permit built development on playing fields or on land last used as a playing field unless one or more of the following applies:

- 1) It is demonstrated that there is an excess of playing field provision in the area, for current and future uses of both the school and the community; or
- 2) The proposed use is ancillary to the primary use as a playing field and does not affect the quantity or quality of pitches or adversely affect their use; or
- 3) The proposed development is on land incapable of forming a pitch or part of a pitch and does not result in the loss of, or inability to make use of, a pitch; or
- 4) The playing field or fields that would be lost as a consequence of the proposed development would be replaced, prior to the commencement of the development, by a playing field or fields of at least a similar or improved quality and size in a suitable nearby location and subject to equivalent or improved management arrangements; or
- 5) The proposed development is for an indoor or outdoor sports facility, the provision of which would be sufficient benefit to sport and recreation as to outweigh the detriment caused by the loss of the playing field or playing fields

In each case the playing field should not make an important visual contribution to the amenity of the area and its loss should not be detrimental to the character of the area.

7.49 Historically, the area of the site where the training facility is to be located contained a playing field, however the area has fallen into dis-use and has not been used for any sporting activities for in excess of 5 years. This is a closed secure site and the former playing field was not available for community use, and as such it is considered that the use of this area of the site for the training facility, albeit not strictly in accordance with policy.

Policy HE01 – Archaeology

- 7.50 The Policy states that the Council will promote the identification, recording, protection and enhancement of archaeological sites, monuments and historical landscape features.
- 7.51 Sufficient information should be submitted with a planning application that allows the assessment of the impact of the proposal on the significance of the heritage asset and planning permission will be refused without adequate assessment of the archaeological implications of the proposal.
- 7.52 Normally where a development would affect an archaeological site, preservation of remains in situ will be sought, but where this is not possible or justified appropriate provision for investigation and recording will be required.

Policy HE03 - Heritage Assets

- 7.53 The Policy states that the Council supports the retention of local heritage assets, including buildings, structures, features and gardens of local interest. Local heritage assets will be identified in a local list as part of the Heritage Strategy.
- 7.54 Proposals that affect both designated and non-designated heritage assets, will be assessed by reference to the scale of harm, both direct and indirect, or loss to, the significance of the heritage asset in accordance with the criteria in the National Planning Policy Framework.

Policy CC01 - Fluvial and Tidal Flooding

- 7.55 The Policy states that new development in an area identified as being at risk of flooding and falling within Flood Zones 2 and 3, will only be permitted if it can be demonstrated that it satisfies the Sequential Test and, where required, the Exception Test as set out in the NPPF.
- 7.56 Development proposals in these areas shall be accompanied by a Flood Risk Assessment, including developments over 1 hectare in Flood Zone 1, which should address flood risk from all sources of flooding including surface and groundwater flooding.
- 7.57 Any development that takes place in a flood risk area will be expected to incorporate flood resilient measures.

Policy CC02 - Surface Water Management

- 7.58 The Policy states that new development is required to manage surface water resulting from the development using sustainable drainage systems (SuDs) wherever possible. SuDs design, together with a robust long term maintenance plan should be included as an integral part of the master planning and design process for new development and should, wherever possible, incorporate multi-functional benefits for people and wildlife. Developers should demonstrate how the guidance produced by the Lead Local Flood Authority (LLFA) has been taken into account and applied when submitting a planning application for any major development. Approval of the design and measures to be implemented for the long term maintenance of SuDs will be required prior to development being permitted.
- 7.59 When preparing SuDs schemes developers should fully consider the potential impact on the historic environment and ensure that any damage is mitigated. Proposals for SuDs at sites within the Groundwater Source Protection Zone as shown on the Policies Map, or sites near the Groundwater Source Protection Zone, must demonstrate that the methods used will not cause detriment to the quality of the groundwater.

- 7.60 Sites identified as a Tidally Sensitive Area (as identified in surface water management plans) will need to incorporate Sustainable Drainage Methods and a maintenance schedule where appropriate, at the design stage of a planning application, and a Flood Risk Assessment will be required before planning permission can be granted.

Policy SE03 - Land Affected by Contamination

- 7.61 This policy requires that development on land known or suspected to be contaminated or likely to be adversely affected by such contamination will only be permitted where:
1. Appropriate investigation and assessment has been carried out as part of the application
 2. The proposed remediation measures would be acceptable in planning terms and would provide effective safeguards against contamination hazards during the development and subsequent occupation of the site.
- 7.62 Planning conditions will be attached to any consent to ensure that remedial measures are fully implemented before occupation.
- 7.63 Where contamination is only a possible risk, a site investigation will be required by condition.

Policy SE04 - Groundwater Protection

- 7.64 The Policy States that proposals for development within the Groundwater Source Protection Zones identified on the Policies Map will only be permitted if there is no risk of contamination to groundwater sources. If a risk is identified, development will only be permitted if adequate mitigation measures can be implemented. Proposals which involve the use of piled foundations on contaminated sites must demonstrate that they will not cause disturbance of any ground so as to cause turbidity in water supply and/or create pathways enabling contaminated materials to reach the groundwater.
- 7.65 Proposals for Sustainable Drainage systems involving infiltration must be assessed and discussed with the Environment Agency to determine their suitability in terms of the impact of any drainage into the groundwater aquifer.

Policy SE05 - Air Quality

- 7.66 The Policy states that all major development schemes should promote a shift to the use of sustainable low emission transport to minimise the impact of vehicle emissions on air quality. Development will be located where it is accessible to support the use of public transport, walking and cycling.
- 7.67 New development must ensure that users are not significantly adversely affected by the air quality and include mitigation measures where appropriate.
- 7.68 All developments which either individually or cumulatively are likely to have a detrimental impact on air quality, will be required to submit an Air Quality and/or Emissions Mitigation Assessment, in line with the Air Quality Technical Planning Guidance 2016 and any subsequent revisions.
- 7.69 The Air Quality Assessment should address the cumulative effect of further emissions. The Emission Mitigation Assessment should address any proposed mitigation measures through good design and offsetting measures that would prevent the National Air Quality Objectives being exceeded or reduce the extent of the air quality deterioration. These will be of particular importance within the urban AQMA, associated areas and areas of lower air quality.

7.70 Proposals that fail to demonstrate these will not be permitted.

Policy SE06 - Noise Pollution

7.71 The Policy states that in areas where noise levels are relatively high, permission will be granted for noise sensitive development only where adequate mitigation is provided, and the impact of the noise can be reduced to acceptable levels.

7.72 Development proposals that generate significant levels of noise must be accompanied by a scheme to mitigate such effects, bearing in mind the nature of surrounding uses. Proposals that would have an unacceptable impact on noise-sensitive areas or uses will not be permitted.

Policy SE08 - Light Pollution

7.73 The Policy states that development proposals that include the provision of new outdoor lighting or require specific lighting in connection with the operation of the proposed development will be permitted if it can be demonstrated that:

- 1) It has been designed to minimise light glare, light trespass, light spillage and sky glow through using the best available technology to minimise light pollution and conserve energy;
- 2) There is no adverse impact on residential amenity and the character of the surroundings;
- 3) There is no adverse impact on sites of nature conservation interest and/or protected and other vulnerable species and heritage assets;
- 4) There is no adverse impact on landscapes character areas, the wider countryside or those areas where dark skies are an important part of the nocturnal landscape;
- 5) It does not have an adverse impact on long distance views or from vantage points;
- 6) Where appropriate, mitigation measures are proposed.

7.74 In addition a lighting strategy may be required for major developments or those developments with specific lighting requirements or for those that are in or adjacent to sensitive locations.

7.75 A Landscape and Visual Impact Assessment will be required for proposed developments that fall in to the E1 category, as set out in Table 15 Environmental Zones.

7.76 Proposals that exceed the Institution of Lighting Professionals standards will not be permitted.

Policy TP01 - Transport Assessments and Travel Plans

7.77 The Policy states that development proposals would have significant transport implications shall be supported by a Transport Assessment and where applicable a Travel Plan. These should show how multi-modal access travel options will be achieved, and how transport infrastructure needs arising from the expected demand will be provided.

7.78 In relation to other developments, a Transport Statement will be required, which addresses any transport impacts arising from the development and any mitigation measures that are needed to minimise the identified impact.

Policy TP02 - Walking

7.79 The Policy states that new development will be expected to be designed so as to facilitate safe and convenient movement by pedestrians including people with limited mobility, elderly people and people with young children.

- 7.80 The Council will seek to approve proposals to provide and enhance safe and convenient walking routes including specifically connection to and between public transport stops, railway stations, town centres, residential areas, schools and other public buildings.

Policy TP03 - Cycling

- 7.81 The Policy states the Council will seek the provision at the earliest opportunity of a network of cycle routes. Development that would prejudice the safety of existing or implementation of proposed cycle routes will not be permitted.
- 7.82 New development will be expected to consider the need for the safety of cyclists and incorporate facilities for cyclists into the design of new and improved roads, junction improvements and traffic management proposals.
- 7.83 Substantial development generating travel demand will be expected to provide convenient cycle parking and changing facilities.
- 7.84 New residential development will be expected to provide secure facilities for the parking and storage of cycles.

Policy TP04 - Public Transport

- 7.85 The Policy states that development proposals will be expected to take account of the need to facilitate use of public transport. The Council will seek to approve proposals consisting of or incorporating:
- 1) improvement of passenger and waiting facilities;
 - 2) measures to improve personal security;
 - 3) improved accessibility for people with mobility limitations;
 - 4) bus/rail interchange facilities;
 - 5) secure cycle storage.

Policy TP06 - Car Parking

- 7.86 The Policy states proposals for development will be expected to make satisfactory provision for the parking of vehicles, including disabled parking.
- 7.87 Suitable levels of provision will be considered in relation to individual proposals taking account of the type of development, location, accessibility, availability of opportunities for public transport, likely accumulation of carparking, design considerations and having regard to the guidance referred to below. Parking provision in the town centres will also be assessed in relation to the provisions of Policies SP10-SP12.
- 7.88 In considering the level of parking provision in respect of proposals for residential development (use class C3), the Council will have regard to the guidance provided in Kent Design Review: Interim Guidance Note 3 - Residential Parking or any subsequent guidance.
- 7.89 In considering the level of parking provision in respect of proposals for other development, the Council will have regard to the indicative guidance in Kent Vehicle Parking Standards 2006 (Appendix C), or any subsequent guidance.
- 7.90 Where the level of provision implied in the above guidance would be detrimental to the character of a conservation area or adversely affect the setting of a listed building or ancient monument then a reduced level of provision may be accepted.

- 7.91 Within the town centres of Margate, Ramsgate and Broadstairs (as defined on the Policies Map) new development proposals will not be required or expected to provide onsite car parking spaces. Where feasible such proposals should consider measures to encourage occupiers to make greater use of public transport.

Policy TP10 - Traffic Management

- 7.92 The Policy states development required to implement traffic management measures designed to realise the best use of the highway network in terms of safety, traffic capacity and environmental conditions will be approved.

Supplementary Planning Documents

- 7.93 In addition to the adopted Local Plan, Thanet District Council has a number of Supplementary Planning Documents that inform the implementation of local plan policies. These are a material consideration in the determination of planning applications. A brief overview is provided below of those relevant to the Manston Planning Proposal.

Landscape Character Assessment SPD (July 2020)

- 7.94 The Landscape Character Assessment (LCA) provides detailed guidance to support adopted Local Plan policies that promote local distinctiveness through appropriate land management in association with future changes to the landscape.

Planning Obligations and Development Contributions (April 2010)

- 7.95 This SPD is a guide to developers setting out what contributions may be required to support development. Of relevance to the Manston Planning Proposal is the requirement to provide necessary transport infrastructure to meet the need of the development. This matter has been the subject of ongoing discussions between Kent County Council and the Home Office and their advisors during the development of the Manston Proposal.

The Kent Design Guide (2006)

- 7.96 This was prepared by Kent County Council and provides design criteria to inform development to ensure that it achieves high standards of design and construction.

National Planning Policy Framework (2024)

- 7.97 The National Planning Policy Framework (NPPF) (updated December 2024) sets out a 'presumption in favour of sustainable development' (Paragraph 11). This comprises three dimensions, as set out in **Paragraph 8**

- An economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- A social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe

places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

- An environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

7.98 The key paragraphs of the NPPF for this proposal are considered to be:

7.99 **Paragraph 39** states that local planning authorities should work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area.

7.100 **Paragraph 48** requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.

7.101 **Paragraph 85** states that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity.

7.102 **Paragraph 87** states that planning policies and decisions should recognise and address the specific locational requirements of different sectors.

7.103 **Paragraph 96** states that policies and decisions should 'achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible and enable and support health lives through both promoting good health and preventing ill health'

7.104 **Paragraph 101** states that significant weight should be placed on the importance of new, expanded or upgraded public service infrastructure when considering proposals for development.

7.105 **Paragraph 104** states that existing open space, sports and recreational buildings and land, including playing fields and formal play spaces should not be built on unless they are surplus to requirements, or the loss would be replaced by equivalent or better provision, or the development is for alternative sports and recreational provision.

7.106 **Paragraph 116** states that 'development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios' (our emphasis).

7.107 **Paragraph 117** states developments should give priority to pedestrian and cycle movements and have access to high quality public transport facilities, create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians and, consider the needs of people with disabilities by all modes of transport.

7.108 **Paragraph 118** states that all developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a vision-led transport statement or transport assessment so that the likely impacts of the proposal can be assessed and monitored.

7.109 **Paragraph 125** states that planning policies and decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs and such proposals should be approved unless substantial harm would be caused.

7.110 **Paragraph 135** states that planning decisions should aim to ensure that developments:

- Will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development (our emphasis);
- Are visually attractive as a result of good architecture and appropriate landscaping;
- Are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change;
- Establish and maintain a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;
- Optimise the potential of a site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and other public space as part of developments) and support local facilities and transport networks;
- Create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience (our emphasis).

7.111 **Paragraph 164** states that new development should be planned for in ways that avoid increased vulnerability to the range of impacts arising from climate change and help to reduce climate change impacts.

7.112 **Paragraph 166** requires that local planning authorities when determining planning applications should expect new development to comply with development plan policies on local requirements for decentralised energy supply and take account of site context and layout to minimise energy consumption.

7.113 **Paragraph 181** states that when determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment. Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that:

- Within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;
- The development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment;
- It incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;
- Any residual risk can be safely managed; and
- Safe access and escape routes are included where appropriate, as part of an agreed emergency plan

7.114 **Paragraph 182** states major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. The systems used should:

- Take account of advice from the lead local flood authority;
- Have appropriate proposed minimum operational standards;

- Have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development; and
- Where possible, provide multifunctional benefits.

7.115 **Paragraph 187** states planning policies and decisions should contribute to and enhance the natural and local environment by:

- Protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
- Recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
- Maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
- Minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
- Preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability.
- Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
- Remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate (our emphasis)

7.116 **Paragraph 193** states that when determining planning applications, local planning authorities should apply the following principles:

- a) If significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;
- b) Development on land within or outside a site of special scientific interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of sites of special scientific interest;
- c) Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and
- d) Development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

7.117 **Paragraph 197** states “Where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner.”

7.118 **Paragraph 198** states Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well

as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:

- a) Mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life;
- b) Identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and
- c) Limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.

7.119 **Paragraph 199** states that planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.

7.120 **Paragraph 207** states that where proposals affect heritage assets the applicant should describe the significance of the heritage assets affected, including any contribution made by their setting. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary.

7.121 **Paragraph 210** states that in determining applications, local planning authorities should take account of:

- a) The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- b) The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- c) The desirability of new development making a positive contribution to local character and distinctiveness.

7.122 **Paragraph 212** advises that great weight should be given to a heritage asset's conservation. This is irrespective of whether any potential harm amounts to substantial harm, total loss of or less than substantial harm to its significance.

National Design Guide

7.123 The National Design Guide was published by the Ministry of Housing, Communities and Local Government (MHCLG) in 2019. Its purpose is to provide guidance on how the policies in the Framework can be put into practice and illustrates how *'well-designed places that are beautiful, healthy, greener, enduring and successful can be achieved in practice'*.

7.124 The NDG explains that well-designed places have individual characteristics that work together to create physical character. These characteristics help to nurture and sustain a sense of community, which in turn work to positively address environmental issues affecting climate

- 7.125 The NDG explains what each of the 10 characteristics are providing good practice examples of how they can be incorporated as part of the development of place and space. The 10 characteristics are based on the objectives set out in Chapter 12 of the Framework – Achieving Well Designed Spaces.

Biodiversity Net Gain

- 7.126 The Town and Country Planning Act (TCPA) 1990, Schedule 7, Paragraph 13 sets out the conditions where prior to commencing work on site there is a need for a Biodiversity Net Gain (BNG) plan that must be submitted and approved. It states:

“(1) Every planning permission granted for the development of land in England shall be deemed to have been granted subject to the condition in sub-paragraph (2).

(2) The condition is that the development may not be begun unless—

(a) a biodiversity gain plan has been submitted to the planning authority (see paragraph 14), and

(b) the planning authority has approved the plan (see paragraph 15).”

- 7.127 Paragraph 17 sets out exceptions to this requirement and states:

“Paragraph 13 does not apply in relation to—

(a) development for which planning permission is granted—

(i) by a development order, or

(ii) under section 293A (urgent Crown development), or

(b) development of such other description as the Secretary of State may by regulations specify.”

- 7.128 Accordingly, a biodiversity net gain plan is not required to, and does not therefore, form part of this planning proposal.

8. Planning Considerations

- 8.1 This planning proposal is required to assist in managing the processing of migrants who arrive in the UK irregularly by small boats. The Manston Reception Centre (MRC) has been operating without planning permission since early 2022 and was set up at speed to deal with the unprecedented arrivals that came to the UK in 2021 and 2022. The planning proposal seeks to regularise the existing use of the site as an Initial Triage and processing centre and the associated accommodation, services, engineering works and associated infrastructure that have been constructed on site since it became operational. The planning proposal also seeks consent for the continued use of the site for the triaging and processing of migrants together with replacement facilities and the refurbishment of existing buildings to provide new accommodation, ancillary administrative facilities and communal services. The MRC will continue to process single adult males, single adult females and families. The SSHD has identified that there is an ongoing and urgent need for the MRC and a training facility (as described in Section 1 of this report).
- 8.2 The Planning Proposal is supported by a suite of plans and documents that assess the impacts of the proposal and where relevant provide a range of mitigation measures that the proposed development will need to adopt in order to make the proposal acceptable in planning terms, however it is considered that this can be achieved and overall no matter has been identified that would indicate that consent should be withheld.
- 8.3 Together with Section 9 (Technical Considerations) this section sets out the considerations that are of particular relevance to the proposed development and thus the main planning issues. Specifically:

The principle of Development (Section 8)

- The principle of the proposed development and the location of development;
- The need for the proposed development; and
- The benefits of the proposed development.

The technical considerations (Section 9)

- a) The effect of the proposed development on highway safety and transport infrastructure;
- b) The effect of the proposed development on the health and wellbeing of existing communities, with particular regard to noise, light, air quality, access to healthcare and other local services, crime and the fear of crime, and fostering good relations/community cohesion;
- c) The effect of the proposed development on cultural assets;
- d) The effects of the proposed development on the character and appearance of the area;
- e) The effect of the proposed development on the local economy; and
- f) The effect of the proposed development in relation to flood risk, biodiversity and climate change.

Principle of Development

- 8.4 Subject to independent approval of the planning proposal, the proposed planning consent will grant retrospective planning permission for the operational development provided in connection with the Initial Triage and Processing Centre, including marquees for accommodation of migrants and associated services, engineering works, refurbishment of existing building used in connection with the centre.

- 8.5 In addition, planning permission is sought for a triage and processing centre that will be able to service up to 1600 services users at any one time together with a new training facility.
- 8.6 As part of the planning proposal consent is sought for a range of operational and infrastructure development required to support the MRC.
- 8.7 The full range of technical and other material considerations have been carefully assessed to inform the proposal, understand the impacts and mitigate accordingly where required. The use of the site for a migrant processing centre and training facility is considered to be acceptable in planning terms and in accordance with national planning policy.
- 8.8 There are no local planning policies regarding the principle of an initial triage and processing facility for migrants, however the entire site and surrounding area is designated in the Thanet Local Plan (2020) as development in the countryside. Policy SP24: Development in the Countryside seeks to limit new development on non-allocated sites in such areas in order to protect the character of the local area. The policy sets out the circumstances in which development in countryside policy areas can be supported. Criterion 5 of Policy SP24 allows for the redevelopment of brownfield sites for uses compatible with its countryside setting and surroundings.
- 8.9 The planning proposal is located on a former RAF site that was in use by the Ministry of Defence until the Home Office acquired the site. The eastern part of the site is characterised by a range of one, two and three storey buildings associated with its former use. There are also extensive areas of hardstanding throughout the site. The proposal identifies on Drawing No. 050836-9834-ATR-ZZZ-XX-DR-A-0350-S4-D0100 Rev P012 the maximum extent of the proposal and this largely corresponds to the western part of the site. Buildings proposed to be erected as part of the new facility are considered to represent infill within the existing built envelope with no wholesale demolition and redevelopment proposed and will be limited in scale to a maximum of 12 metres in height. The proposed use of the site is a secure facility and shares some of the same characteristics as the former military use. It is considered therefore that the proposal complies with Criterion 5 of Policy SP24.

Site Selection

- 8.10 As a principle, there is no requirement to consider alternative sites unless there are exceptional circumstances which mean it is capable of being a material consideration.
- 8.11 In this case, no such exceptional circumstances arise. The relative pros and cons of the proposal have been assessed as part of the submission documents and none of them would be so significantly adverse so as to raise the question of alternative sites being a relevant consideration. Neither is the site subject to any particular constraints (such as being in the Green Belt or in Flood Risk Zone 3) which would mean a sequential approach to sites is needed.
- 8.12 Linked to that, it should be noted that the site comprises previously developed land and carries a number of distinct advantages which means it is particularly well suited to the proposed operation as set out below.
- 8.13 The Manston site is a highly suitable available location for processing large volumes of people arriving into the UK, due to its strategic location, accessibility and privacy of the site. For this reason, once the site became a Home Office asset after the transfer of the site from the MOD at the beginning of 2023, the Home Office started planning for longer term facilities at the site.

Suitability of the Site

- 8.14 The Manston site is ideally suited and located for the triaging and reception operation hence the standing up of operations there at speed to address the situation in Autumn 2022 as the only available and suitable site.
- 8.15 Being in Government ownership, the site was available to the Home Office in the urgent timescales required. The site was of sufficient size and had suitable existing infrastructure to allow operations to be stood up quickly (for example, enabling the adaption of existing buildings such as the former fire station which is a processing reception and former barracks which provide healthcare facilities and residential holding accommodation).
- 8.16 Furthermore, being a former airbase, the site has a high standard of security (such as controlled entry points and perimeter fencing for example) already in place which is essential for the Manston reception operation.
- 8.17 The size of the site also allows for the siting and delivery of essential ancillary services such as healthcare on site. Making off site provisions elsewhere would be operationally inefficient and not in the best interests of users. Available space on site also allows the flexible siting of operations and buildings away from sensitive receptors to help reduce any potential adverse impacts.
- 8.18 The site is also geographically well located in a short distance (approximately 45 minutes) to Dover where small boat arrivals land which is an essential and fundamental reason as to why the site is entirely suitable and appropriate for these proposals.

Need for the Proposed Development

- 8.19 It is vital, that the Home Office has the infrastructural capability to bring those who arrive at the UK irregularly (by any route) into the immigration system rapidly. It is vital that there is an appropriate facility where those individuals can be securely detained, while their identity and other details are collected and verified.
- 8.20 Forthcoming policy and operational changes as a result of the creation of the Border Security Command (BSC) will also have an impact on irregular migration trends. The UK's Border Security Command will deliver cutting edge new technology, extra officers and further covert capabilities across the system and work closely with the National Crime Agency (NCA), the police and other law enforcement agency partners to bolster the UK's border security and disrupt the criminal people smuggling gangs.
- 8.21 It is possible that irregular migration of some description will continue to occur, with the Southeast remaining the most likely entry point. As a result, Manston remains an important strategic asset for the Home Office in this part of the country, as the only site currently in operation, capable of processing large volumes of people arriving by irregular means.

Benefits of the Proposed Development

Efficient Processing of Migrants

- 8.22 The proposed development will provide a centre for processing migrants who come into the UK by irregular means. The Initial Triage and Processing Centre and the proposed new facility will be able to process a maximum of 1600 migrants in any one 24 hour period.

- 8.23 It is important to note that the existing arrangements at Manston were set up at speed with limited resources and short-term, tactical decision making (necessary at the time). Since then, the site has been improved. However, without the appropriate planning permissions and permanent infrastructure in place, challenges have remained. Service-user flow around the site is not optimised due to limitations of the infrastructure and its layout. Plans to upgrade the current infrastructure, to provide a more fit for purpose facility, will enable processing to be carried out more efficiently, reduce overall running costs, and ensure that the site remains fully secure

Employment Generation

- 8.24 Up to 1,199 FTE staff may be employed at the MRC with a further 144 FTE employed at the new training facility. During the construction phase up to 550 net additional construction jobs will be created per year, supporting £40m of Gross Added Value (GVA) at the Thanet District level.
- 8.25 The Socio-Economic Assessment concludes that the proposed development could align with and support a number of national, sub-regional and local economic growth policies and strategic objectives through providing new employment, skills and training opportunities in the local area, thereby providing opportunities for local residents to capitalise on these resulting in a benefit to the local economy.
- 8.26 In summary, during both the construction and operational phases of the development substantial economic benefits to the local economy will be generated both in terms of employment generation and expenditure.

Sustainable Development

- 8.27 The proposal includes the refurbishment and modernisation of a number of buildings in the Operational Area of the site to bring them up to current Building Regulation standards and make them fit for purpose. The refurbishment works will improve the energy performance of the buildings and make best use of existing buildings, avoiding the need for significant demolition, albeit some buildings have and will need demolishing where they cannot be viably brought back into use.
- 8.28 New buildings proposed on the site are modular and will meet current Building Regulation standards and are designed to minimise energy consumption using energy efficient building designs and building services systems. The use of roof mounted PV solar panels will reduce the reliance on the national grid making the development more sustainable. The Energy and Sustainability Statement confirms that a carbon assessment of the new development demonstrates that a reduction of 23% carbon emissions could be achieved when comparing the Future Scenario with the Baseline Scenario. The site wide energy consumption and associated emissions will continue to reduce once the completion of the refurbishment and upgrades has taken place.
- 8.29 The proposed new facility will incorporate a number of measures into the design that will increase the climate resilience of the Site including measures to reduce surface water flooding during heavy rainfall events and provision of underground attenuation tanks to mitigate the impacts of drought.
- 8.30 A Waste Management Strategy is submitted in support of the planning proposal to ensure that waste generation is reduced from all sources, both during the construction and operational periods, thereby contributing to the overall sustainability of the Site.

- 8.31 It is recognised that there has been some loss/deterioration of ecology/biodiversity on the Site since the temporary facility began operating in 2022, however the new facility will provide opportunities to create ecological and biodiversity enhancements.
- 8.32 The Energy and Sustainability Statement recognises that although the proposed development has been designed to minimise water usage, it will result in an increase of circa 193% of potable water consumption and wastewater consumption compared to the baseline. However, the proposed development includes new SUDS infrastructure which will result in improved surface water runoff from the site and the associated benefits that this brings with it such as reduction in soil erosion and benefits for local ecology.
- 8.33 As part of the travel planning strategy for the site to encourage more sustainable patterns of travel, the development will provide electric vehicle charging on site.
- 8.34 Overall it is considered that the development will deliver improvements to the Site that will bring forward a development that is more sustainable than the current operations.

Cumulative Impacts

- 8.35 A Cumulative Effects Assessment (CEA) has been prepared in support of the planning proposal and considers the effects from the project itself (intra scheme effects) and cumulatively with other developments that may come forward in a comparable timeframe to the proposed development (inter-project effects).
- 8.36 The assessment of intra-scheme effects considers in combination changes to access, visual amenity, noise, air quality, soil and water quality that effect human receptors. It also considers in combination impacts from changes to air quality, noise, water quality and habitat loss or severance on ecological resources.
- 8.37 The CEA concludes that assuming all mitigation measures set out in the environmental technical assessments are implemented, the cumulative impact on human receptors and ecological resources would not give rise to substantial intra-Scheme effects.
- 8.38 The assessment of inter-project effects considered the potential for the impacts of the proposed development to interact with impacts from committed developments that meet defined spatial and temporal thresholds (also referred to as Reasonably Foreseeable Future Projects (RFFPs)). It takes a worst-case scenario assuming that the projects would be constructed at the same time. The CEA shortlisted four RFFPs, set out below:
- Manston Airport Development Consent Order – Statutory Instrument The 2022 No. 922
 - 4 No. 2 storey Industrial buildings to the north of the Site – Application Ref: F/TH/20/0590
 - Manston Business Park (42.5ha employment land) – Site Allocation reference SP05 of the Thanet Local Plan -
 - Land at Manston Court Road/Haine Road – Strategic Housing Allocation for 1400 dwellings, secondary school and highways infrastructure – Site Allocation Reference Policy SP20
- 8.39 The CEA concludes that there would be no significant cumulative effects anticipated from the Proposed Development acting together with the relevant RFFPs.

- 8.40 Overall, the CEA concludes that as there are no substantial effects anticipated as a result of intra scheme effects and inter projects effects, then no additional mitigation or enhancement measures are required over and above those proposed in the technical assessments.

9. Technical Considerations

9.1 The section assesses the technical considerations relevant to the proposed development. Specifically,

- a) The effect of the proposed development on highway safety, access and transport infrastructure;
- b) The effect of the proposed development on the health and wellbeing of existing communities. with particular regard to noise and amenity, light, air quality, access to healthcare and other local services, crime and the fear of crime, and fostering good relations/community cohesion;
- c) The effect of the proposed development on cultural assets;
- d) The effects of the proposed development on the character and appearance of the area;
- e) The effect of the proposed development on the local economy; and
- f) The effect of the proposed development in relation to flood risk and drainage (including groundwater), arboriculture, ecology, biodiversity, geology and soils, waste and material assets, and climate change and sustainability.

9.2 The following matters are material considerations in the decision-making process. A technical report is submitted in support of the planning proposal for each of the matters considered below and as detailed in Section 1 of this statement.

A - Highway Safety, Access, and Transport Infrastructure

9.3 In support of the planning proposal is submitted a Transport Assessment, Travel Plan and Outline Construction Traffic Management Plan (OCTMP). These documents aim to identify the impacts of the Proposal and set out appropriate mitigation measures.

Construction Stage

9.4 The OCTMP outlines the strategies to be employed during the construction period to ensure the safety of road users, construction personnel, the local community, staff, service users and visitors. The key objectives set out in the OCTMP are as follows:

- Minimise Traffic Disruptions
- Safe Access and Routing
- Traffic Flow Management
- Safety Measures
- Environmental Considerations

9.5 The document submitted is an Outline Framework document that will provide the basis of the full CTMP that will be developed post planning consent. The principles set out in the CTMP will ensure that the construction process can progress efficiently whilst ensuring that the safety and wellbeing of all stakeholders is maintained. The full CTMP can be secured through an appropriately worded condition on the planning consent.

9.6 It is considered that the OCTMP provides the basis for ensuring that construction traffic does not have an unacceptable impact on the safety of road users, construction personnel and the local community.

Operational Phase

9.7 In assessing the impact of the proposed development on the local highway network, the Transportation Assessment has considered the short-term implications of the MRC (phased

approach) and the long-term implications including committed development and associated infrastructure. The Transport Assessment phasing approach for the MRC development refers to the ITPC temporary phase, the MRC construction phase and MRC operational phase.

- 9.8 The TA concludes that the MRC will have varying impacts on the local transport network, depending on the phase and scenario approach considered.
- 9.9 However, overall the TA finds that two junctions (Junction 2 Spitfire Way/Manston Road and Junction 5 A299/B2190) will experience congestion and will require mitigation measures in the future as a result of all committed developments.
- 9.10 In respect to Junction 2, the mitigation measures advised by the TA is a proportionate financial contribution to help support the future delivery of highway improvements at Manston Road/Spitfire Way junction that will be able to accommodate future traffic volumes envisaged and will support committed developments. Junction 5 only requires minor geometric changes to the Tothill Street approach at the A299/B2190 junction.
- 9.11 The proposed highway mitigation (in the form of a proportionate financial contribution) at Junction 2 is considered to comply with Policy SP47 of the Thanet Local Plan (2020) that safeguards strategic routes for key road schemes and junction improvements.
- 9.12 The Home Office are having ongoing dialogue with Kent County Council and third parties regarding the funding contribution and mechanisms for delivering any improvements Junction 2.
- 9.13 Other mitigation includes controls to minimise car travel to and from the site during peak hours. Implementation of the identified highway mitigation in the TA will ensure that the planning proposal can be delivered without having any unacceptable impacts on highway safety and would ensure that residual cumulative impacts on the road network, following mitigation would not be severe taking into account all reasonable future scenarios. In this regard the proposal meets the test in paragraph 116 of the NPPF.
- 9.14 A Travel Plan for the site has been prepared which sets out a range of sustainable travel initiatives which are proposed subject to further discussions with Kent County Council, these are as follows:
- Commitment to continue working with Kent County Council and third parties (adjacent developers and landowners) on shared sustainable transport initiatives (i.e. initiatives worked up in conjunction with the previously referred to parties for mutual benefit) to deliver modal choice and reduce reliance on single-vehicle occupancy travel
 - Development of improved pedestrian routes and cycle paths in collaboration with adjacent developments to enhance to enhance accessibility and promote sustainable transport
 - Enhancement of public transport connectivity particularly to key rail stations like Thanet Parkway, to reduce car dependence and support increased employment opportunities in the Manston area
 - Promotion of sustainable transport to the MRC facility and reduce Single Occupancy Vehicles
 - Parking management and control plans for the MRC site through the provision of:
 - 800 car parking spaces with 25% EV charging points
 - 58 operational vehicle spaces with 100% EV charging points
 - 41 motorcycle spaces
 - 30 bicycle spaces

9.15 The Highways Position Statement (appended to the Transport Statement) sets out the following operational controls that should be implemented:

1. Continued controlled access to site and car parks. Requirements for ID and parking permits to limit access to authorised personnel and visitors only
2. Continued provision of dedicated car share parking spaces closer to offices
3. Continued monitoring of car parking and enforcement of breaches
4. Use of shared cars and/or minibuses for the training facility operations

9.16 It is considered that the travel planning proposals put forward are in accordance with the provisions of the Thanet District Transport Strategy (2015 – 2031) and relevant transport policies in the Thanet Local Plan (2020). The proposed development will promote safe and sustainable travel (SP43) and will make a proportionate contribution to highway improvements and improvements of sustainable travel links (SP45 and SP47). Appropriate technical assessments are submitted which address the transport impacts arising from the proposal (TP01), with opportunities for walking, cycling and public transport taken account of and improved where possible (TP02, TP03 and TP04). Sufficient car parking is considered to be proposed (TP06).

B - The effect of the proposed development on the health and wellbeing of existing communities. with particular regard to noise, light, air quality, access to healthcare and other local services, crime and the fear of crime, and fostering good relations/community cohesion;

Noise and Amenity

9.17 A Noise and Vibration Assessment has been undertaken by AtkinsRéalis and assesses the suitability with regards noise, of the proposed development.

9.18 The impact of noise and vibration during construction has been assessed and it concludes that *“there are no adverse noise or vibration impacts anticipated at nearby sensitive receptors.”*

9.19 Whilst it notes that *“On-site sensitive receptors may be subject to temporary, short-term adverse noise and vibration impacts during construction”*, it goes on to conclude that *“noise mitigation measures should be considered to minimise these impacts.”*

9.20 The operational noise from mechanical plant associated with the Proposed Development has been assessed. Based on the proposed acoustic design assumptions, the Noise and Vibration Assessment concludes that *“it is not considered likely that operational noise levels will give rise to any adverse noise impacts on the users of the Proposed Development or adjacent sensitive receptors”*.

9.21 Additional traffic associated with the proposed development has also been assessed and no significant adverse noise effects are predicted.

9.22 In relation to the operation of the site, the Assessment concludes that *“it is not considered likely that operational noise levels will give rise to any adverse noise impacts on the occupants of the development or adjacent sensitive receptors.”*

9.23 The Assessment recommends limits for daytime and night-time operational noise as well as setting out the noise criteria that the mechanical plant systems will need to achieve when being

finalised in the detailed design stage. A summary of the findings taken from the Noise Impact Assessment are set out in Table 5 below.

Table 5 Summary of Noise Assessment Findings

Residential	- Daytime internal $L_{Aeq,16\text{ hour}}$ to all habitable rooms no greater than 35 dB; - Night-time internal $L_{Aeq,8\text{ hour}}$ to all bedrooms no greater than 30 dB; - Night-time internal $L_{Amax,F}$ to all bedrooms no greater than 45 dB³; and - Daytime $L_{Aeq,16\text{ hour}}$ in outdoor amenity areas no greater than 55 dB where practicable.
Office and Processing Facilities	- Unoccupied indoor ambient noise level (IANL) should not exceed 45 dB $L_{Aeq,T}$ for office spaces - Interview rooms should be no greater than 35 dB $L_{Aeq,T}$
Training Facility	35 dB $L_{Aeq,30mins}$
Mechanical Plant	Not to exceed background sound levels.

- 9.24 Overall, it concludes that the site is suitable for the MPP and it is unlikely to give rise to any significant negative noise impacts.

³ Indoor sound pressure levels should not exceed approximately 45 dB L_{Amax} more than 10 times per night

Air Quality

- 9.30 An Air Quality Assessment has been undertaken to determine the potential local air quality effects during the construction and operation phase of the Proposed Development.
- 9.31 During the construction phase the proposed development has the potential to generate dust and PM₁₀ emissions that may have short term impacts on human health receptors. However, with appropriate mitigation measures in place during future demolition or construction activities, the site should not result in a significant residual effect at these receptors. The mitigation measures can be secured via a Dust Management Plan, either within the full Construction Environment Management Plan (CEMP) or as a standalone document.
- 9.32 Construction will result in changes in traffic flows due to construction traffic associated with the new development, however the AQA concludes that these will be temporary and unlikely to have a significant short-term effect on local air quality.
- 9.33 The AQA has carried out a detailed assessment using dispersion modelling for the operational phase of the development, modelling concentrations of NO₂, PM₁₀ and PM_{2.5} and were shown to be below relevant AQS objectives and PM_{2.5} targets at all receptors both with and without the proposed development. The impact of changes in concentrations as a result of the operation of the proposed development is expected to be negligible at all modelled receptors, with no significant effects on air quality.
- 9.34 A detailed air quality assessment using dispersion modelling was undertaken for the Sandwich Bay to Hacklinge Marshes designated site. The sensitivity tests undertaken concluded that:
- The effect of changes in road traffic emissions on air quality as a result of the operation of the Proposed Development is considered not significant for ecological receptors given that NO_x concentrations in 2026 and 2028 without and with Proposed Development are well below annual mean critical level for NO_x for the protection of vegetation of 30µg/m³ and the changes in annual mean concentrations with the Proposed Development or 0.1 µg/m³ or less.*
- 9.35 A separate assessment⁴ has been undertaken on air quality for the use coaches to transport migrants from Dover to the proposed development, which is expected to pass through the A20 AQMA. To assess the baseline position monitoring undertaken at diffusion tube sites within and surrounding the Dover A20 AQMA recorded annual mean NO₂ concentrations below the AQS objective of 40 µg/m³. PM₁₀ monitoring also undertaken within the Dover A20 AQS recorded concentrations below the annual mean and 24 hour mean AQS objectives. Defra mapped background concentrations of PM₁₀ and PM_{2.5} are also below the relevant AQS objectives.

⁴ Dover A20 AQMA Supplementary Air Quality Assessment, December 2024

- 9.36 The supplementary Air Quality Assessment concludes that concentrations of NO₂, PM₁₀ and PM_{2.5} are unlikely to exceed AQS objectives with or without the additional coach journeys associated with the proposal in 2026 or 2028. The assessment however further concludes that:

There are however exceedances of PM_{2.5} targets (10 µg/m³ to be met by 2040 and interim target of 12 µg/m³ to be meet [sic] by the end of January 2028), without and with the additional coach journeys associated with the Proposed Development.

- 9.37 However, overall the assessment concludes that the maximum change in concentrations with the additional coach journeys is 0.1 µg/m³ for NO₂, PM₁₀ and PM_{2.5}. Therefore, the concentration of these emissions at all human health receptors can be described as negligible in relation to AQS objectives., and not significant for human health receptors. No mitigation measures are proposed.
- 9.38 It is therefore concluded that the proposals do not compromise the objectives of the Dover AQMA and are considered to comply with **paragraph 192 of the NPPF**. The proposed development is supported by a Travel Plan, which recommends a number of measures to reduce the number of private car journey and a modal shift towards more sustainable transport measures. These measures would assist in minimising the impact of the development on air quality. The assessed impacts on air quality are assessed as negligible with no further mitigation proposed. The proposals are considered to comply with **Policy SE05 of the Thanet Local Plan**.

Healthcare and Local Services

- 9.39 A Human Health Impact Assessment has been prepared by AtkinsRéalis and forms part of this submission. It considers the impacts of the proposed development on determinants of human health.
- 9.40 During the construction phase, the assessment identified a number of mitigation measures that will control the impact on human health and avoid significant negative effects arising. This includes:
- Production and implementation of a construction traffic management plan, which will also place parameters on construction traffic such as prescribed times of travel for HGVs;
 - Production and implementation of an Outline Construction Environmental Management Plan, to be developed into a Construction Environmental Management Plan before construction activity commences; and
 - Measures for public safety, including the maintenance of a secure site boundary to prevent public access.
- 9.41 During operation, the assessment identifies the following two measures as key:
- Conversion of the Framework Travel Plan into a full Travel Plan; and
 - Where require appropriate medication can be dispensed on site and any medication not held on site can be sourced from the local pharmacy. Emergency healthcare provision, including diphtheria vaccinations are offered to migrants and staff at Manston.
- 9.42 The existing and future operation of the Manston site also have Standard Operating Procedures (SOP) in place to deal with notifiable communicable diseases (NCD). The Health Impact Assessment submitted in support to the planning proposal concludes that “with the

implementation of the above mitigation there will be no significant residual human health effects arising from impacts to determinants of human health on any of the identified population groups” both during construction and operations.

Education, Leisure & Recreation

- 9.43 The MRC and IPTC will provide outdoor and indoor recreation facilities that are considered appropriate for the limited time period that migrants will spend at Manston. Indoor recreational facilities are within a number of rooms that contain a variety of activities. Outdoor recreational facilities are provided with seating. Facilities are provided for service users in both the STHF and the RHRs.

Worship & Prayer

- 9.44 Facilities are provided at the site for religious worship and includes prayer rooms and washing facilities. These are available to migrants 24 hours per day, seven days per week.
- 9.45 Site staff respect migrants’ rights to observe their religious festivals on site and will, where possible, facilitate access to space to enable them to practice as required.

Fear of Crime

- 9.46 As the site is a detained site, Crime Prevention and the Fear of Crime are not such complex issues compared with a non-detained site where individuals are free to come and go. Migrants are only detained usually for a maximum of 24 hours before leaving the site.
- 9.47 One issue previously at Manston has been in relation to protestors, however the Home Office team have managed previous protest successfully with limited Police support. The Site has procedures in place to manage site security and protests and regularly liaise with Kent Police. and Kent Police and the Manston Estates Team have identified a designated protest area (Manston Road/Spitfire Way Junction).
- 9.48 Existing and proposed security staff provide a 24/7, 365-day presence at the site. All security personnel are appropriately licensed and security vetted. Access and egress to the site is controlled by the security team, and all access gates in use are staffed and secured at all times. There is a combination of fixed and mobile CCTV across the site, with coverage focused on the access points.
- 9.49 The Home Office will continue to ensure there are open channels of communication available with the community to ensure they are able to raise any concerns, including those relating to security.
- 9.50 It is therefore considered that the proposals are in accordance with **paragraphs 96(b) and 135(f) of the NPPF**.

C – Cultural Heritage

- 9.51 An Archaeological Desk Based Assessment (DBA) has been undertaken by AtkinsRealis to support the planning proposal at Manston.
- 9.52 The site does not contain any designated heritage assets or Scheduled Ancient Monuments nor is it within a Conservation Area. Within the site itself the DBA makes reference to a number of military heritage assets that are reported in the Kent Heritage Environment Records, these include the following:

- A former location for residents' huts, mess halls and surgeries (MKE 100326) located in the west
- An intelligence hut (MKE98029) located in the south (proposed to be demolished)
- Three pillbox records (MKE39389, MKE39388, MKE115510 located in the southeast and northwest
- A destroyed concrete structure (MKE98429) located in the central-east
- A chain home low (CHL) station (MKE98429) located in the northeast

9.53 The above non-designated military heritage assets are associated with the site's use during World War 1 and II. Many of these assets have been removed resulting in this element of their significance to have been lost. The DBA concludes that these assets predominantly derive significance from their historical and communal interest. As these assets are non-designated they are considered to hold low archaeological value and low heritage significance as their contribution is only made to the historic environment at a local level.

9.54 In addition, within the site boundary the KHER identifies Pouces, a Post Medieval farmstead (MKE86971) located in the south-west of the site. The state of preservation of this non designated heritage asset cannot be fully determined however modern satellite imagery, up to date site plans and site photography show no evidence of above ground remains although there could be the potential for below ground remains. Overall, the DBA concludes that the former farmstead is considered to hold low significance.

9.55 The DBA identifies that the proposed development has the potential to cause a moderate to adverse impact to potential sub-surface remains and buildings of the former residents' huts (MKE 100326). The DBA recommends that mitigation by way of appropriate Historic Building Recording would lessen the impact of the proposals. Further, the DBA recommends that there should be consultation with the local authority archaeologist to establish appropriate mitigation in the area proposed for the training facilities.

9.56 It is considered with appropriate mitigation that the -proposed development would comply with **Section 16 of the NPPF** and would also be compliant with **Policies HE01 and HE03 of the Thanet Local Plan**.

D - Landscape and Visual

9.57 A Landscape and Visual Impact Assessment has been prepared by AtkinsRéalis. This assesses the landscape and visual impacts on key receptors during construction and operation.

9.58 There are no statutory landscape designations within the study area, nor are there any conservation areas. There is 1 scheduled monument within the study area, c. 800m to the north-west of the site boundary, as well as a Grade II listed building c. 475m to the west.

9.59 The local landscape character is considered to comprise a generally flat landform with minor undulations around Manston airport allowing for long distance views.

9.60 The assessment concludes that at both year 0 and year 15, the proposed development would have a neutral effect on the landscape character, as a consequence of the existing nature of the character within the site, which includes sporadic areas of buildings and open spaces.

9.61 Mitigation measures proposed include planting that at Year 15 maturity would be in keeping with the existing landscape character.

- 9.62 The assessment concludes that there would be slight adverse visual effects on some residential properties during the construction period due to the removal of mature vegetation.
- 9.63 Similarly during the operational period at Year 1 the scheme would have slight adverse visual effects on a limited number of residential properties prior to the mitigation planting become established. Although at Year 15, there would still be some slight adverse visual effects on some residential receptors, the views towards the completed scheme will be reduced by the maturing mitigation planting which will reduce the likely visibility of the proposed buildings.
- 9.64 Mitigation measures proposed include retaining existing mature trees and hedgerows where possible and planting new trees and hedgerows to offset those that have to be lost.
- 9.65 The assessment concludes that there would be no significant negative effects of the Scheme on landscape or visual receptors during the operational phase.

E – Socio-Economic Impact

- 9.66 A socio-economic statement has been prepared which considers the socio-economic impacts of the proposed development. The impact statement identifies a number of economic benefits that could be delivered to the local Thanet economy as part of the scheme. These are summarised as follows:
- Up to 1,200 new gross direct FTE jobs (with up to 800 net additional jobs at the Thanet level)
 - Up to £100m gross annual Gross Value Added (GVA) contribution to the local economy
 - Up to £480m of net additional GVA contribution to the local economy over 10 years of operation (discounted)
 - Up to 550 net additional construction job years supporting c £40m of GVA at the Thanet level through the construction phase
 - Potential for up to £1m of additional annual business rates receipts for the local authority.
- 9.67 The Socio-Economic Assessment concludes that the proposed development could align with and support a number of national, sub-regional and local economic growth policies and strategic objectives through providing new employment, skills and training opportunities in the local area, thereby providing opportunities for local residents to capitalise on these resulting in a benefit to the local economy.
- 9.68 The proposed development supports economic growth in the local area in compliance with policies in the NPPF, specifically **paragraph 85** is considered to bring significant economic benefits to the local area. and complies with **Policy SP24 of the Thanet Local Plan**.

F - The effect of the proposed development in relation to flood risk, biodiversity, and climate change

Arboriculture, Ecology and Biodiversity

- 9.69 A number of surveys have been taken to support the Manston Planning Proposal as follows:
- Bat Survey
 - Bird Survey
 - Botany Survey

- Badger Survey
- Great Crested Newt Survey
- Ecological Appraisal
- Ecological Impact Assessment
- Arboricultural Impact Assessment

- 9.70 The Ecological Impact Assessment (ECiA) assesses the impact of the proposed development on the ecological features present on the site taking account of the survey work that has been undertaken.
- 9.71 The assessment notes that there is an area of excavated land within the site where habitat was removed prior to assessment but concludes that as an ecological feature it is unlikely to have been of greater than local importance. As the habitat features have already been removed the excavated land area would need to be compensated for through onsite habitat creation and enhancement delivered as part of the proposed development.
- 9.72 In the western corner of the site there is woodland that is assessed as of 'local importance' as it is a priority habitat. The loss of the woodland would result in a significant negative impact. A Landscape Ecological Management Plan (LEMP) is proposed and the successful implementation of this would ensure the impacts are reduced to not significant, resulting in no residual effect.
- 9.73 The Shooting Range Meadows and Sports Ground Area of the site contains flora and vegetation that is assessed as being of County importance and loss of habitat in these areas would result in significant negative impacts. The implementation of the LEMP, appropriate habitat compensation and an appropriate Construction Environmental Management Plan (CEMP) will reduce the impacts to not significant, with no resulting residual effects.
- 9.74 There are other areas within the site referred to as Verges and Lawns and road Verge Areas and Plots. The flora and vegetation in these areas is considered to be of local importance, together with other areas of calcareous grassland. Management of these areas through the implementation of the LEMP, appropriate habitat compensation and a CEMP will reduce the impacts to not significant with no resulting residual effects.
- 9.75 Lizard Orchid, Basil Thyme, Strawberry Clover, Field Scabious and Field Mouse Ear are present on the site.
- 9.76 Basil Thyme is listed under section 41 of the Natural Environment and Rural Communities Act 2006 as being a species of principal importance for biodiversity. Its presence on the site is important in understanding the biodiversity of the Isle of Thanet.
- 9.77 Lizard Orchid is a plant species identified in Schedule 8 of the Wildlife and Countryside Act 1981 (as amended) and it is legally protected against intentional picking, uprooting or destruction.
- 9.78 The other species identified are assessed as being of Local importance but scarce and under threat.
- 9.79 Management of these species through the implementation of the LEMP, appropriate habitat compensation and an appropriately worded CEMP will reduce the impacts to not significant with no resulting residual effects.

- 9.80 The EciA concludes that the bat assemblage is of local importance and the loss or degradation of commuting or foraging habitats or the loss of roosting sites could result in a significant impact on the bat assemblage. The successful implementation of the LEMP, CEMP (including updates), Habitat Compensation Report and lighting design will ensure all impacts are reduced to not significant, resulting in no residual effects.
- 9.81 Long-eared Owl is also present and is of County importance. The successful implementation of the LEMP, CEMP (including updates), Habitat Compensation Report and lighting design will ensure all impacts are reduced to not significant, resulting in no residual effects.
- 9.82 Bird Assemblage is assessed as being of Local importance and significant negative impacts to the bird assemblage would result due to loss or degradation of valuable habitats. The successful implementation of the CEMP (including updates) will reduce the impacts to not significant, resulting in no residual effects.
- 9.83 Invertebrate Assemblage is unlikely to be of greater than County importance and the ECiA concludes that there could be potential for the proposals to have significant negative impact on the invertebrate assemblage. The successful implementation of the LEMP, CEMP (including updates), Habitat Compensation Report and lighting design will ensure all impacts are reduced to not significant, resulting in no residual effects.
- 9.84 The EciA concludes that a number of planning conditions and/or obligations should be secured as part of the planning proposal, these are as follows:
- Habitat Compensation Report
 - Site wide LEMP
 - Updates to the current Outline CEMP and/or production of a new CEMP by relevant contractors
 - Translocation Method Statement for Basil Thyme; and
 - Site wide External Lighting Design (as proposed in the Lighting Assessment)
- 9.85 A license will also be required from Natural England to undertake works where Lizard Orchid is present.
- 9.86 The above conditions are set out in the suggested conditions listed that are submitted in support of the Manston Planning Proposal.
- 9.87 For the reasons described in Section 7, the proposed development is not required to provide a BNG plan and this does not therefore form part of this submission.
- 9.88 A Tree Survey has been completed and forms part of the planning proposal. The Arboricultural Impact Assessment concludes that due to the numbers of trees that are required to be removed (64 individual trees, 4081m² of tree groups and 230m² of woodland, a landscape strategy to identify potential areas for replacement tree planting to compensate for the tree loss is required. It should be noted that no Category A trees would be impacted by the proposals, however, 42 No. Category B trees (moderate quality) and 22 No. Category C trees (low quality) would be need to be removed.
- 9.89 A high level landscape strategy is submitted in support of the development proposal, however more details would need to be provided following the detailed design of the site including an updated Arboricultural Impact Assessment and Tree Protection Plan if the location of the new MRC and Training Facility were located in a different area of the Site than that identified by the illustrative proposals. This additional information could be secured by way of condition.

- 9.90 With proposed mitigation measures and habitat compensation, the proposed development is considered to comply with **paragraphs 187 and 193 of the NPPF** and **Policies SP30 and SE08 of the Thanet Local Plan**.

Geology and Soils

- 9.91 A number of reports have been prepared to support the Manston Planning Proposal in relation to Geo-environmental and Geotechnical matters, these are as follows:
- Geotechnical Desk Study
 - Ground Investigation Report
 - Outline Remediation Strategy
- 9.92 The Geotechnical Desk Study (GDS) evaluates the key ground conditions, historical land uses and potential contamination risks. Its purpose is to inform subsequent phases of the development including ground investigations and engineering design.
- 9.93 In respect of ground conditions, the report states that the site is underlain by Margate Chalk and superficial Head Deposits. These materials require further investigation to confirm their geotechnical characteristics and suitability for foundation design. The GDS recommends a phased ground investigation to assess the extent of dissolution features in the chalk, ground bearing capacity and groundwater levels. Geophysical surveys and boreholes are recommended to establish foundation design parameters. The report recommends that ground investigation and groundwater monitoring is undertaken to understand the water levels and understand the contamination risks to ground water.
- 9.94 The GDS advises that due to the historical use of the site as a military base and fire training facility there may be contaminants including fuel oil leaks and fire-fighting foam. In addition, material containing asbestos is likely to exist due to the structures on the site. The contaminants identified pose a risk to groundwater, which is classified as a Principal Aquifer and source protection zone. The GDS recommends that targeted investigations should be undertaken to determine the level of soil and groundwater contamination. If significant contamination is found appropriate measures will be required to protect human health and controlled waters. Appropriate measures should be implemented to manage asbestos during demolition.
- 9.95 Following the recommendations in the GDS AtkinsRealis prepared a detailed ground investigation specification and the investigations were undertaken by RSK Geosciences in May and June 2024. The specification and results of the Ground Investigations are set out in the Ground Investigation Report (GIR) submitted with the Planning Proposal. The investigations carried out to date identify that there are contaminated land risks associated with asbestos and polycyclic aromatic hydrocarbons (PAH), which are considered to pose a risk to future site users as they are present in shallow on-site soils.
- 9.96 The GIR recommends further mitigation measures to reduce the risk, including a clean cover layer to areas of soft landscaping. As the detailed design for the proposal is not yet fixed the GIR recommends further targeted ground investigations to be undertaken particularly in the fire training area and associated infrastructure to the north-east and east of the site.
- 9.97 The GIR concludes that the risks from ground gas to property receptors are very low.
- 9.98 The GIR concludes that there is a moderate risk posed to groundwater receptors on the site and recommends further ground investigation to address data gaps and refine the controlled

waters risk assessment. Further ground investigations are also required to inform the detailed foundation design.

- 9.99 As a result of the history of the site as a RAF base the GDS also concludes that there is a moderate potential for Unexploded Ordnance and a detailed UXO risk assessment is recommended before commencing intrusive ground works. A Detailed Unexploded Ordnance (UXO) Risk Assessment was completed in January 2024 and is submitted in support of the Manston Planning Proposal and the recommendations within that report should be followed.
- 9.100 The conclusions in the GDS and the subsequent findings following the site investigations set out in the GIR together with other historic surveys have been used to inform an Outline Remediation Strategy (ORS). The ORS summarises all of the key findings in relation to Geo-environmental matters and outlines a strategy for remediation. The ORS sets out the required activities to be undertaken on the site to address the identified pollutant contaminant linkages. The methods to be employed are removal of known asbestos, excavation, segregation and stockpiling, PFAS, cover systems and radiological remediation.
- 9.101 The ORS recommends further site investigations that will be used to inform a detailed remediation strategy for the site. Once the remediation of the site has been completed a verification report should be prepared in order to provide a complete report of all activities related to contamination, including data collected.
- 9.102 It is considered that the approach taken to dealing with the geotechnical and geo-environmental conditions on the site are in accordance with **paragraphs 187 e) and f), 196 and 197 of the NPPF** and Thanet Local Plan **Policy SE04**. Ultimately **paragraph 197 of the NPPF** advises that where a site is affected by contamination or land stability issues, the responsibility for securing a safe development rests with the developer and/or landowner.

Waste and Materials Assets

- 9.103 An Operational Waste Management Plan accompanies this submission. This sets out that during the operational phase, waste will be sorted on site and collected on a weekly basis by the appointed waste contractor.
- 9.104 The Outline Construction Environmental Management Plan sets out that during the construction phase, a Site Waste Management Plan will be developed. Materials arisings will be managed and minimised as far as reasonably possible, in compliance with the legal duty of care outlined within The Waste Hierarchy through the methods of waste prevention, segregation, reuse and recycling, whenever possible. Waste streams shall be segregated in a designated area of the site with clear signage and away from the site perimeter and other site facilities so as to mitigate fire risk. Waste transfer notes shall be retained as part of the site records. Construction waste collections will utilise a booking system.

Flooding and Drainage

- 9.105 A Flood Risk Assessment (FRA) has been undertaken to support the Manston Planning Proposal. The site is at very low risk of fluvial, groundwater and other sources of flooding. Overall the FRA concludes that the risk of flooding to the site is very low.
- 9.106 The depth to groundwater level is in the order of 20-45m, with groundwater flowing towards the northwest. Shallow perched water may be present in isolated areas of the site within the superficial geology and any made ground deposits. The risk of groundwater flooding is

considered to be 'very low' across the site and thus no specific mitigation measures are proposed for this source of flooding.

- 9.107 The main risk of flooding in certain areas of the site is from pluvial (surface water) flooding. Overall the likelihood of surface water runoff is low, however there are a few localised area that are identified on the Environment Agency map as being of medium risk of flooding. The site design will ensure that existing flow routes through the site would not be blocked or exacerbated.
- 9.108 The FRA also confirms that the low spots on the site will be raised in line with post development land levels, thereby significantly reducing the risk of surface water flooding in areas of medium flood risk.
- 9.109 Climate change is likely to affect the pluvial flood risk. The FRA calculates that to manage the impacts of climate change and to further mitigate the risk of surface water flooding, the use of Sustainable Drainage Systems (SuDS) are recommended. This will ensure that the increase in rainfall forecast due to climate change will be mitigated and that the site remains sufficiently flood resistant and resilient for the lifetime of development, and doesn't increase flood risk elsewhere.
- 9.110 In areas where there is risk of surface water run-off beyond the site perimeter, a perimeter bund or cut off drainage should be considered to retain surface water run off within the site.
- 9.111 Other mitigation measures suggested to manage surface water across the site is the provision of water butts for existing buildings and the introduction of flood resilience measures to reduce flood damage and increase the speed of recovery and reoccupation should the buildings flood in the future.
- 9.112 The FRA concludes that the development can be made safe throughout its lifetime without increasing flood risk elsewhere.
- 9.113 The Drainage Feasibility that is submitted in support of the Manston Planning Proposal confirms the use of SuDS as set out in the FRA. The Drainage Feasibility considers a number of options for foul sewage discharge and recommends that the existing Southern Water infrastructure is used. Due to the timescales for upgrades required to the existing infrastructure there may be delays that require an interim sewage treatment plant to be installed.
- 9.114 It is therefore considered that the proposal complies with **paragraphs 181 and 182 of the NPPF** and **Policies CC01, C02 and SE04 of the Thanet Local Plan**.

Climate Change and Sustainability

- 9.115 A Climate Change Resilience Assessment and Energy Statement accompanies the planning proposal.
- 9.116 The Climate Change Resilience Assessment identifies that there are a number of climate hazards that may impact the Manson site in the future. In particular high and extreme temperatures, wildfire, surface water flooding, drought and high winds and storms may affect the site. These have the potential to impact on the health and wellbeing of certain vulnerable people (e.g. elderly, children or pregnant women) and also on building structures and fabric. Through appropriate design measures the climate resilience of the site can be improved. The assessment recommends that further risk reduction measures will need to be considered at the

detailed design stage, however the assessment concludes that there are unlikely to be significant effects arising from projected climate change.

9.117 The Energy and Sustainability Statement sets out a sustainable energy strategy for the site which focusses on:

- Minimising consumption with energy efficient building envelope designs and deployment of a range of energy efficient building services systems; and
- Deployment of roof mounted on site PV solar energy generation to offset the need for consumption from the grid.

9.118 The assessment considers the baseline, existing and future development scenarios and although the future scenario shows a marked increase in total energy consumption from the baseline and existing scenarios this is mainly due to the substantial increase in energy demand from the new proposed facilities. However, the total is substantially reduced due to energy efficiency building design and on-site renewable energy. Notwithstanding the increase in energy demand there is only a minimal increase in carbon emissions compared to the existing scenario, and a reduction compared to the baseline.

9.119 In respect of the circular economy the use of appropriate building materials and components should be chosen as part of the detailed design of the proposal. During the operational phase high levels of recycling should be encouraged to minimise the amount of waste going to landfill.

9.120 The planning proposal through appropriate design seeks to minimise the impact of climate change and make the future development more resilient. Through the use of PV solar panels and modern materials, the development would reduce carbon emissions when compared to the baseline scenario. The Proposal is considered to comply with **paragraph 164 of the NPPF** and **Policy SP37** of the Local Plan and with mitigation would not have adverse impacts on climate change.

10. Environmental Assessment

Environmental Impact Assessment

- 10.1 The legislative framework for Environmental Impact Assessment ('EIA') is set by European Directive 2011/92/EU, as amended by Directive 2014/52/EU (collectively referred to as the 'EIA Directive'. The EIA Directive requires EIA to be prepared to support planning applications for certain types of projects. For projects in England, the European legislative requirements are provided in the Town & Country Planning (Environmental Impact Assessment) Regulations 2017 ('the 2017 EIA Regulations).
- 10.2 The aim of EIA is to ensure that when planning permission is granted, which is likely to have significant effects, these effects are taken account of in the decision-making process.
- 10.3 Schedule 1 and Schedule 2 of the EIA Regulations define the types of development that may be 'EIA development'. Schedule 1 development is always EIA development, whereas Schedule 2 development comprises a range of development that may be EIA development according to whether it is likely to have significant effects on the environment by virtue of factors such as its nature, size or location.
- 10.4 Schedule 2 projects should seek a screening direction to ascertain if the proposal is EIA development or not. A positive screening direction would require an Environmental Statement to be prepared and submitted with the application based on whether it is likely to have significant effects on the environment.
- 10.5 The type of development being proposed in this instance would fall under Schedule 2 10b) urban development projects of the 2017 EIA Regulations. The screening thresholds for such projects is development of more than 1 ha of urban development, which is not residential development, or inter alia where the overall area of the development exceeds 5 ha.
- 10.6 An EIA Screening Report is submitted to MHCLG as part of the planning proposal. The report concludes that there are no likely significant effects that have been identified during the construction, operation and decommissioning of the proposed development and the proposed development does not constitute an EIA development.

Habitat Regulation Assessment

- 10.7 Regulation 63 of the Conservation of Habitats and Species Regulations 2017 ('the Habitats Regulations') requires the competent authority, in this case the Secretary of State, 'before deciding to undertake, or give consent, permission or other authorisation for, a plan or project which is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects), and is not directly connected with or necessary to the management of that site, must make an appropriate assessment of the implications of the plan or project for that site in view of that site's conservation objectives.
- 10.8 Regulation 64 allows the competent authority to consent to a plan or project which would have an adverse effect on the integrity of a European site, provided it can be demonstrated that the delivery of the plan or project is required for imperative reasons of overriding public interest, and no alternative solutions exist to the delivery of that plan or project.
- 10.9 The process of considering the potential effects of a plan or project on sites protected under the Habitats Regulations is generally referred to as a Habitats Regulations Assessment (HRA).

- 10.10 A Habitats Regulations Assessment (HRA) Screening report was completed in November 2024 and is attached at Appendix A. The report constitutes an assessment of the potential for the proposals to have a Likely Significant Effect on any part of the National Site Network, a network of internationally important wildlife sites in England.
- 10.11 The Report confirms that “Natural England were consulted on the HRA on 26th July 2024 and in their response stated that *‘Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservations sites or landscapes’*.”

Record of Environmental Actions and Commitments (REAC)

- 10.12 A Record of Environmental Actions and Commitment (REAC) is submitted in support of the Manston Planning Proposal. The REAC covers the construction, operational and reinstatement phases of the development. It identifies the main/overarching environmental commitments that have been made to date to address the potential environmental effects of the Proposed Development. The actions and commitments are provided for each of the topic areas assessed as part of the EIA Screening Report.
- 10.13 The REAC is a working document that sets out mitigation measures that have been or will be committed to as part of the development and will monitor compliance of the mitigation measures.
- 10.14 A fundamental component of the REAC is the preparation of a Construction Environment Management Plan (CEMP). An Outline CEMP is submitted in support of the Planning Proposal and a full CEMP will be required and can be the subject of a suitably worded condition. This will be the responsibility of the Principal Contractor.
- 10.15 An Operational Environmental Management Plan (OEMP) will be produced for the operational phase of the Proposed Development.

11. Conclusions

Development description

- 11.1 The Home Office is seeking full planning consent, subject to approval of this proposal, by MHCLG via the Urgent Crown. Development Route The description of development is:

“The retrospective consent of an Initial Triage Processing Centre (temporary) and the proposed development of a permanent facility, the Manston Reception Centre (MRC) and a training facility at the former RAF Manston, Manston Road, Ramsgate, Kent, CT12 5BS.”

- 11.2 A detailed description of the proposed development is set out in Section 2 of this Assessment.

Engagement

- 11.3 An Engagement Report (Cushman & Wakefield, June 2025) is submitted in support of this planning proposal. The Statement explains with evidence how the Home Office has engaged with stakeholders (including landowners and occupiers near the site, as well as neighbouring residents) about the proposed development. It summarises the process by which engagement has taken place, outlines the key meetings and discussions, and the actions resulting from these. Specifically, where changes have been made to the proposal and, where changes have not been made, the reasoning behind the decision.

Planning Considerations

- 11.4 The full range of technical and other material considerations have been carefully assessed to inform the proposal, understand the impacts and mitigate accordingly where required. The use of the site for an MRC and training facility is therefore considered to be acceptable in planning terms and in accordance with national planning policy.

Technical Considerations

- 11.5 Table 11.1 below summarises the conclusions of the technical assessments that accompany the submission.

Matter	Summary Conclusion
Highways and Access	Implementation of the identified highway mitigation in the TA (including a proportionate financial contribution to support the future delivery of highway improvements to the Junction 2 and controls for minimising peak time travel) will ensure that the planning proposal can be delivered without having any unacceptable impacts on highway safety, and would ensure that residual cumulative impacts on the road network, following mitigation would not be severe taking into account all reasonable future scenarios. In this regard the proposal meets the test in paragraph 116 of the NPPF. A Travel Plan has been prepared in support of the proposal. It is considered that the travel planning proposals put forward are in accordance with the provisions of the Thanet District Transport Strategy (2015 – 2031) and relevant transport policies in the Thanet Local Plan (2020), namely SP43, SP45, SP47, TP01, TP02, TP03, TP04 and TP06.
Noise and Vibration	The Site is suitable for the proposed use with regards to noise and vibration, and that no adverse noise impacts on existing sensitive receptors in the local area are expected.

	The MPP is considered to comply with Policies QD03 and SE06 of the Thanet Local Plan and paragraph 198 of the NPPF.
	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
Air Quality	The AQA has carried out a detailed assessment using dispersion modelling for the operational phase of the development, modelling concentrations of NO ₂ , PM ₁₀ and PM _{2.5} and were shown to be below relevant AQS objectives and PM _{2.5} targets at all receptors both with and without the proposed development. The impact of changes in concentrations as a result of the operation of the proposed development is expected to be negligible at all modelled receptors, with no significant effects on air quality. It is therefore considered that the MPP complies with Policy SE05 of the Thanet Local Plan and paragraphs 187 and 199 of the NPPF.
Healthcare and Local Services	The proposed development will, when the recommended mitigation is implemented, not result in any significant residual human health effects during both construction and operation. It is considered that the MPP is compliant with Policy SP38 of the Thanet Local Plan and paragraphs 96 and 135 of the NPPF.
Fear of Crime	The site has procedures in place in respect of management of protests and overall site security and liaises regularly with Kent Police. Whilst service users are detained on site there is no opportunity for them to go out into the local community and there is 24/7, 365 security on the site. It is considered that the MPP is a safe and secure facility and the MPP is compliant with Policy QD02 of the Thanet Local Plan and paragraph 135 of the NPPF.
Heritage	The DBA identifies that the proposed development has the potential to cause a moderate to adverse impact to potential sub-surface remains and buildings of the former residents' huts (MKE 100326). The DBA recommends that mitigation by way of appropriate Historic Building Recording would lessen the impact of the proposals. Further, the DBA recommends that there should be consultation with the local authority archaeologist to establish appropriate mitigation in the area proposed for the training facilities. It is considered with appropriate mitigation that the -proposed development would comply with Section 16 of the NPPF and would also be compliant with Policies HE01 and HE03 of the Thanet Local Plan.
Landscape and Visual	There are no over-riding landscape or visual reasons to conclude that the Proposed development will cause important or unacceptable harm to landscape character or visual amenity. It is concluded that the MPP complies with paragraph 187 of the NPPF and Policy SP26 of the Thanet Local Plan
Socio-Economic	The Socio-Economic Assessment concludes that the proposed development could align with and support a number of national, sub-regional and local economic growth policies and strategic objectives through providing new employment, skills and training opportunities in the local area, thereby providing opportunities for local residents to capitalise on these resulting in a benefit to the local economy. The proposal would bring significant economic benefits to the local economy and would comply with paragraph 85 of the NPPF.

Biodiversity	A range of surveys have informed the Ecological Impact Assessment submitted in support of the Manston Planning Proposal. With proposed mitigation measures and habitat compensation, the proposed development is considered to comply with paragraphs 187 and 193 of the NPPF and Policies SP30 and SE08 of the Thanet Local Plan.
Arboriculture	A Tree Survey and Arboricultural Impact Assessment have been undertaken to support the Manston Planning Proposal. The AiA concludes that due to the numbers of trees that are required to be removed (64 individual trees, 4081m² of tree groups and 230m² of woodland.) a landscape strategy to identify potential areas for replacement tree planting to compensate for the tree loss is required. A high level landscape strategy is submitted in support of the development proposal, however more details would need to be provided following the detailed design of the site including an updated Arboricultural Impact Assessment and Tree Protection Plan if the location of the new MRC and Training Facility were located in a different area of the Site than that identified by the illustrative proposals. This additional information could be secured by way of condition. With the proposed mitigation and compensation it is considered that the proposal is in accordance with paragraphs 187 and 193 of the NPPF and Policies SP30 and SE08 of the Thanet Local Plan in respect to Arboricultural matters.
Geology and Soils	A number of reports have been prepared to support the Planning Proposal and these provide a comprehensive assessment of the risks in relation to geo-environmental and geo-technical matters, with appropriate recommendations provided. It is considered that the approach taken to dealing with the geotechnical and geo-environmental conditions on the site are in accordance with paragraphs 187 e) and f), 196 and 197 of the NPPF and Thanet Local Plan Policy SE04. Ultimately paragraph 197 of the NPPF advises that where a site is affected by contamination or land stability issues, the responsibility for securing a safe development rests with the developer and/or landowner.
Waste and Materials Assets	An Operational Waste Management Plan is included with the submission, as well as an Outline Construction Environmental Management Plan. These demonstrate how the proposal will meet waste planning policy objectives during both construction and operation. The MPP will comply with Policy QD01 of the Thanet Local Plan.
Flood Risk and Drainage	The FRA concludes that the development can be made safe throughout its lifetime without increasing flood risk elsewhere. The Drainage Feasibility that is submitted in support of the Manston Planning Proposal confirms the use of SuDS as set out in the FRA. The Drainage Feasibility considers a number of options for foul sewage discharge and recommends that the existing Southern Water infrastructure is used. Due to the timescales for upgrades required to the existing infrastructure there may be delays that require an interim sewage treatment plant to be installed. It is therefore considered that the proposal complies with paragraphs 181 and 182 of the NPPF and Policies CC01, C02 and SE04 of the Thanet Local Plan.
Climate and Energy	The planning proposal through appropriate design seeks to minimise the impact of climate change and make the future development more resilient. Through the use of PV solar panels and modern materials, the development would reduce carbon emissions when compared to the baseline scenario. The Proposal is considered to comply with paragraph 164 of the NPPF and Policy SP37 of the Local Plan and with mitigation would not have adverse impacts on climate change.

Table 11.1 – Summary of the technical assessments' conclusions

Permitted Development Rights

- 11.6 The Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) ('the GPDO') sets out development which is deemed to be given consent. The Home Office requires that the planning consent includes a provision that retains permitted development rights set out in the GPDO. Specifically rights within Part 1 - 2, 4, 10-11, 13-16, 18-19 in order to provide the Home Office with flexibility in the future to undertake small scale development projects not foreseen at the time of the submission of the Planning Proposal.

Details and Conditions

- 11.7 The planning consent may be subject to a number of conditions that are required to be discharged including pre-commencement conditions. Details to discharge any planning conditions set out in the decision will be made to the Secretary of State for their decision.
- 11.8 A set of suggested conditions is submitted in support of the Manston Planning Proposal. These will be reviewed by MHCLG during the determination of the proposal and amendments/additions will be discussed with the Home Office.

Development Benefits

- 11.9 The proposed development will deliver the following planning benefits:
- Provide a fit for purpose facility, enabling processing of those arriving by small boats to be carried out effectively and securely. Generation of employment opportunities both during the construction and operational phases bringing both employment and expenditure to the local economy
 - Refurbishment and modernisation of existing buildings bringing them up to current Building Regulation Standards and making them fit for purpose
 - High quality new development that will result in a reduction in energy consumption and carbon emissions
 - Making the site more resilient to climate change through a number of design measures
 - enhancements to ecology and biodiversity
 - Improvements to surface water runoff through the provision of new SUDs infrastructure
 - Encouraging more sustainable patterns of travel through the implementation of a Travel Plan

Overall Conclusions

- 11.10 It has been demonstrated that the proposed development is acceptable in planning terms and it is respectfully requested that the SSHCLG grant planning permission with appropriate conditions.



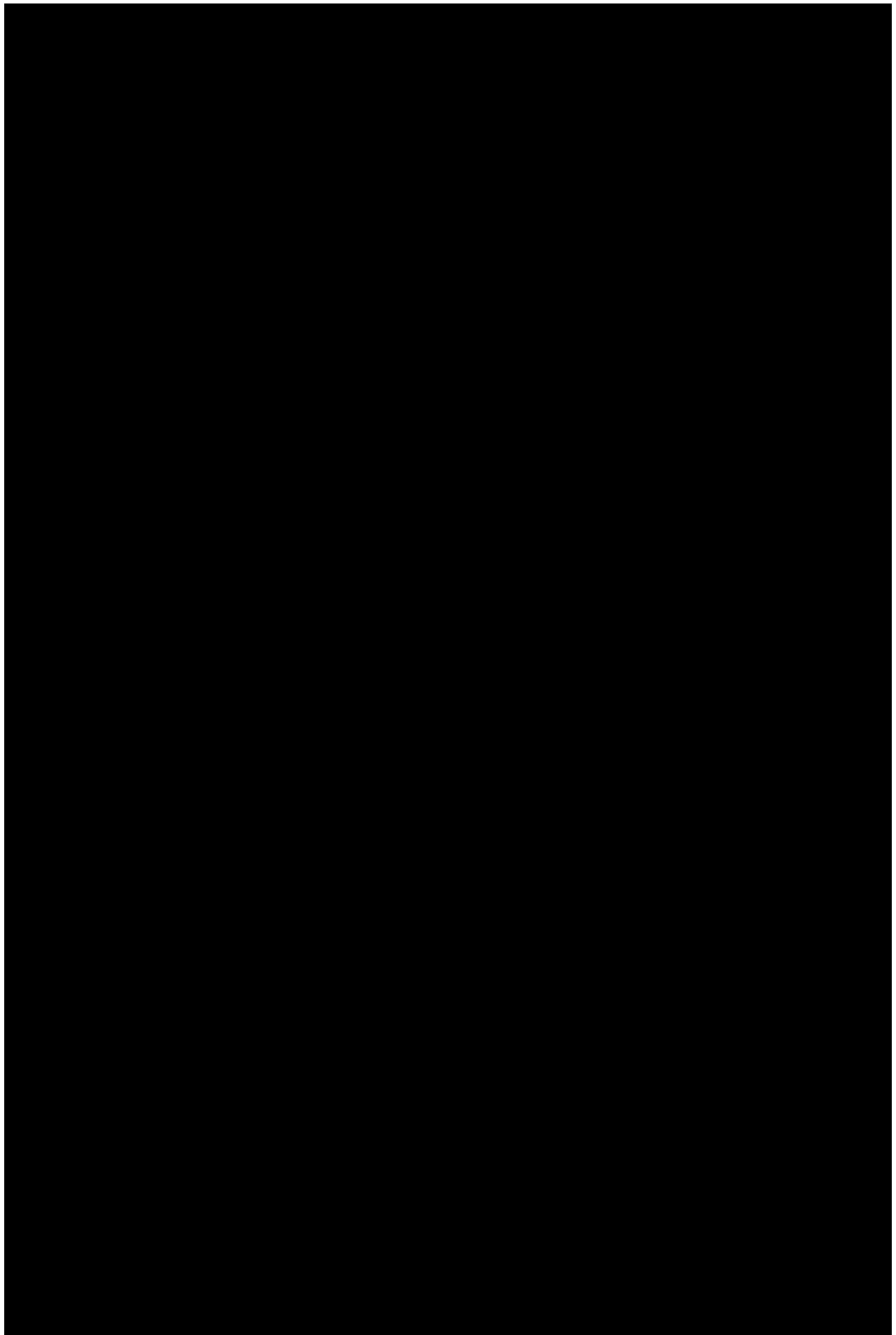
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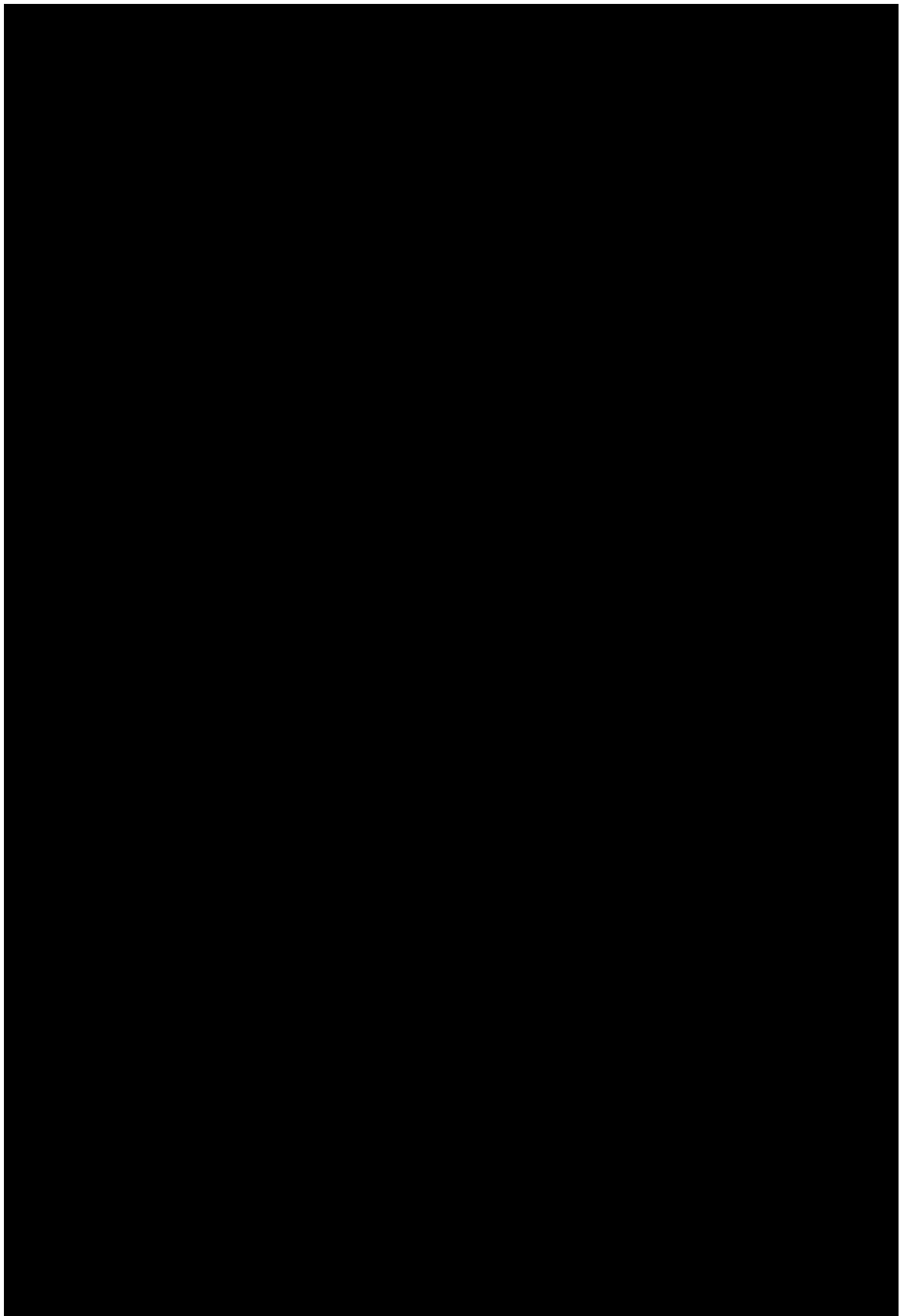
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Appendix 2





the 1990s, the incidence of *S. flexneri* has increased in the United Kingdom [10]. In the United States, *S. flexneri* has been reported as the most common serotype in children with acute bacterial dysentery [11].

There is a paucity of data on the epidemiology of *S. flexneri* in the United Kingdom. In the 1970s, *S. flexneri* was the most commonly isolated serotype from patients with acute bacterial dysentery in the United Kingdom [12]. In the 1980s, *S. flexneri* was the most commonly isolated serotype from patients with acute bacterial dysentery in the United Kingdom [13].

In the 1990s, *S. flexneri* was the most commonly isolated serotype from patients with acute bacterial dysentery in the United Kingdom [14]. In the 1990s, *S. flexneri* was the most commonly isolated serotype from patients with acute bacterial dysentery in the United Kingdom [15].

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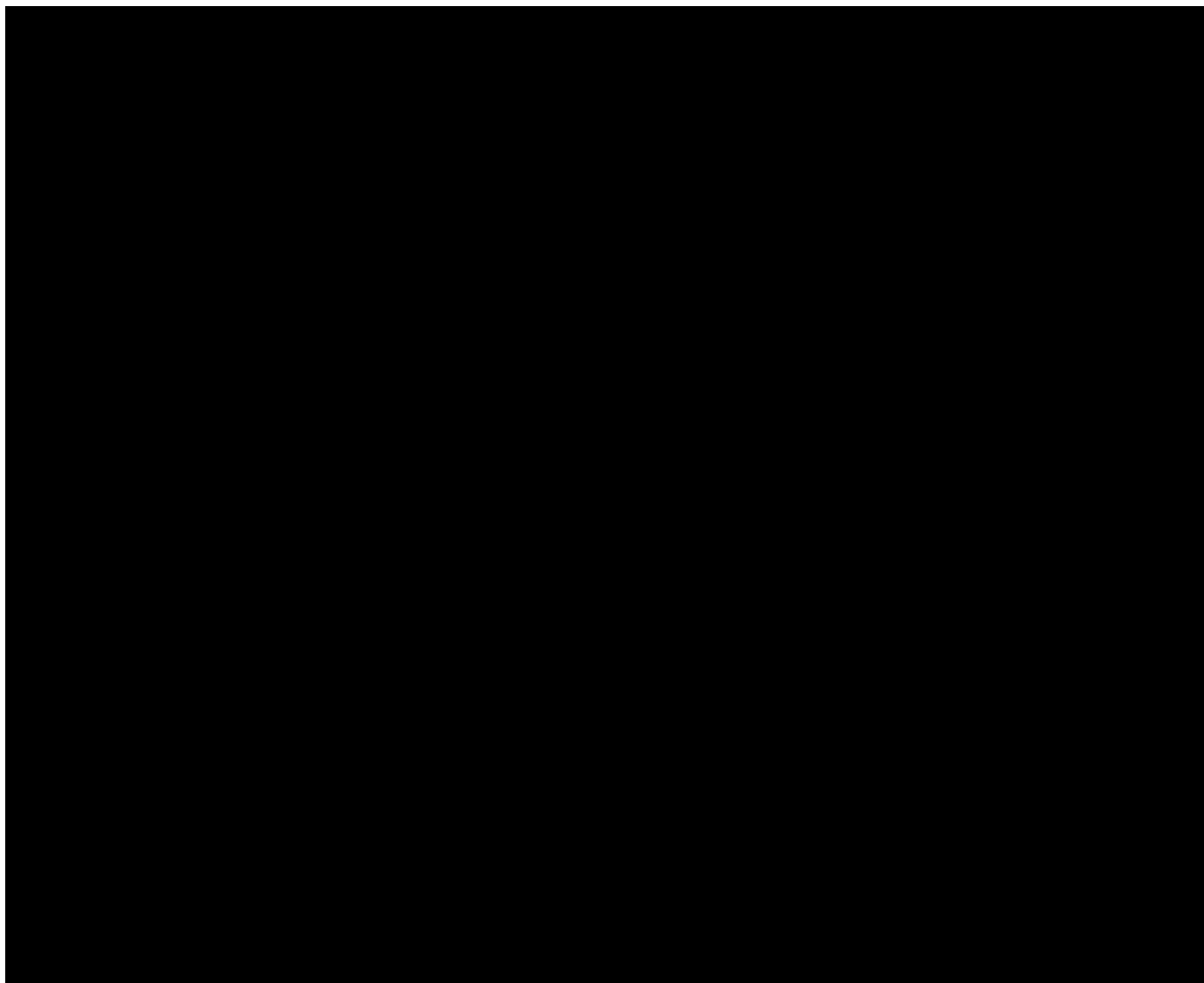
In the 1990s, *S. flexneri* was the most commonly isolated serotype from patients with acute bacterial dysentery in the United Kingdom [18]. In the 1990s, *S. flexneri* was the most commonly isolated serotype from patients with acute bacterial dysentery in the United Kingdom [19].

In the 1990s, *S. flexneri* was the most commonly isolated serotype from patients with acute bacterial dysentery in the United Kingdom [20]. In the 1990s, *S. flexneri* was the most commonly isolated serotype from patients with acute bacterial dysentery in the United Kingdom [21].

In the 1990s, *S. flexneri* was the most commonly isolated serotype from patients with acute bacterial dysentery in the United Kingdom [22]. In the 1990s, *S. flexneri* was the most commonly isolated serotype from patients with acute bacterial dysentery in the United Kingdom [23].

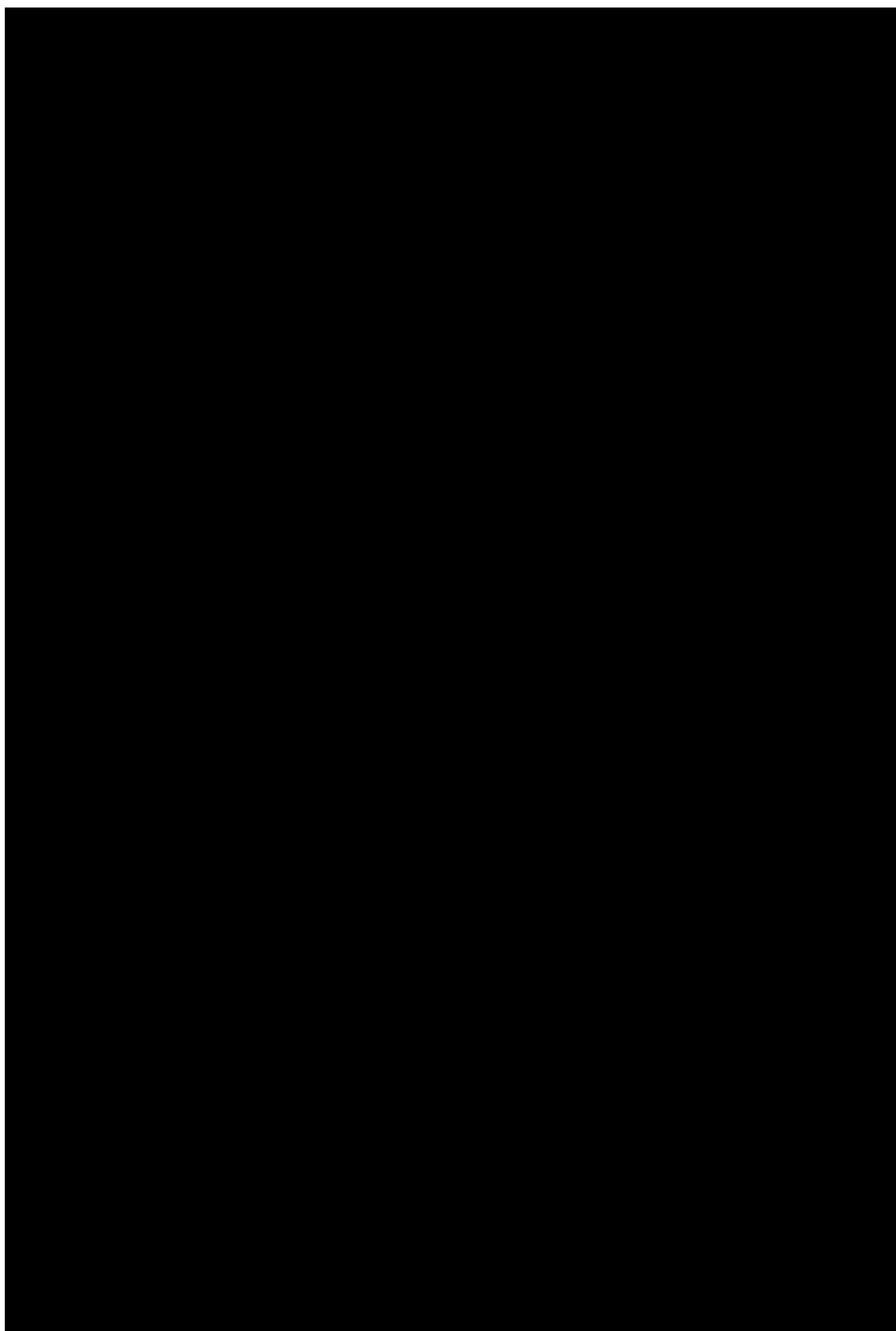
In the 1990s, *S. flexneri* was the most commonly isolated serotype from patients with acute bacterial dysentery in the United Kingdom [24]. In the 1990s, *S. flexneri* was the most commonly isolated serotype from patients with acute bacterial dysentery in the United Kingdom [25].

In the 1990s, *S. flexneri* was the most commonly isolated serotype from patients with acute bacterial dysentery in the United Kingdom [26]. In the 1990s, *S. flexneri* was the most commonly isolated serotype from patients with acute bacterial dysentery in the United Kingdom [27].



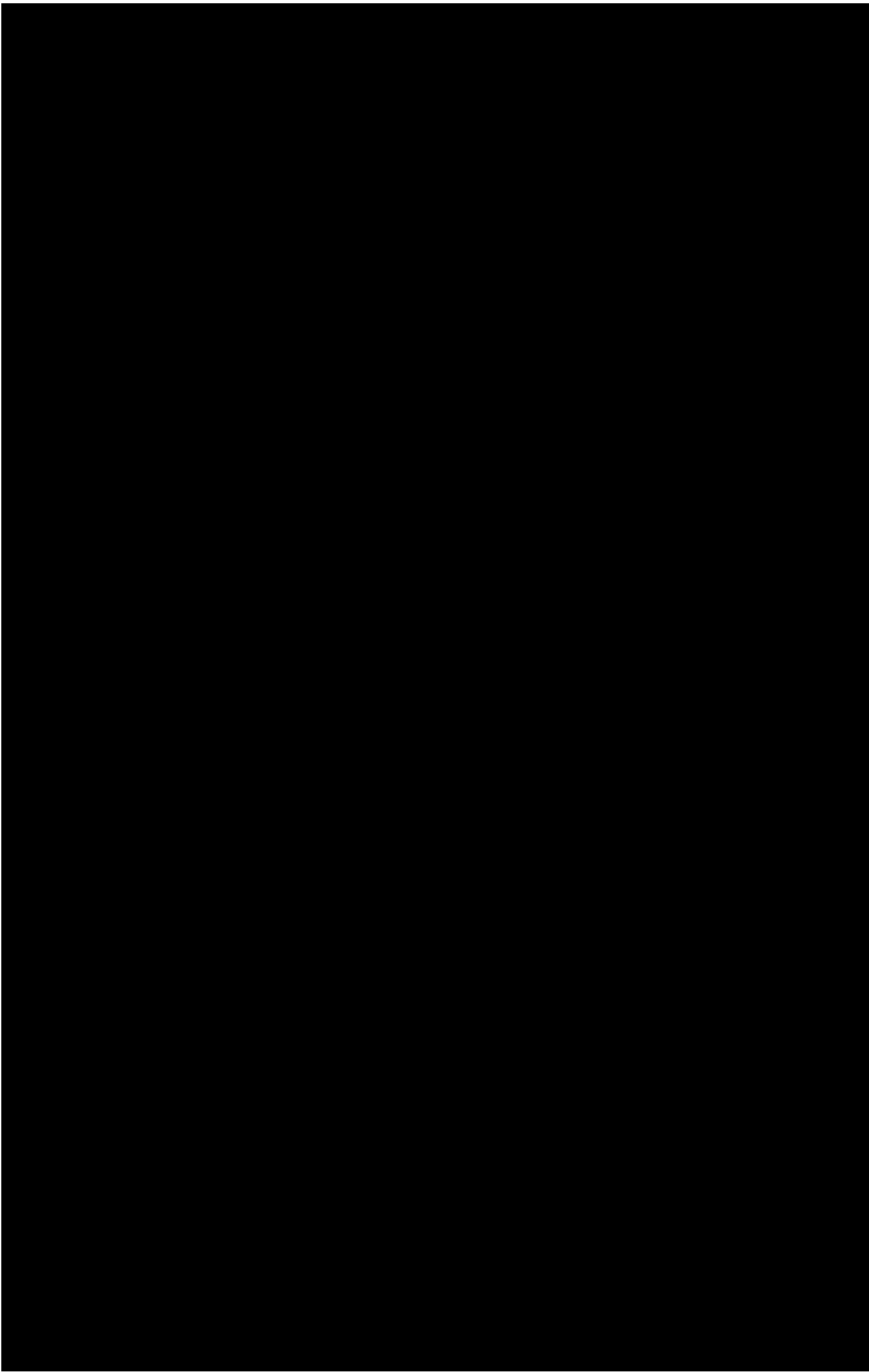
Appendix 3

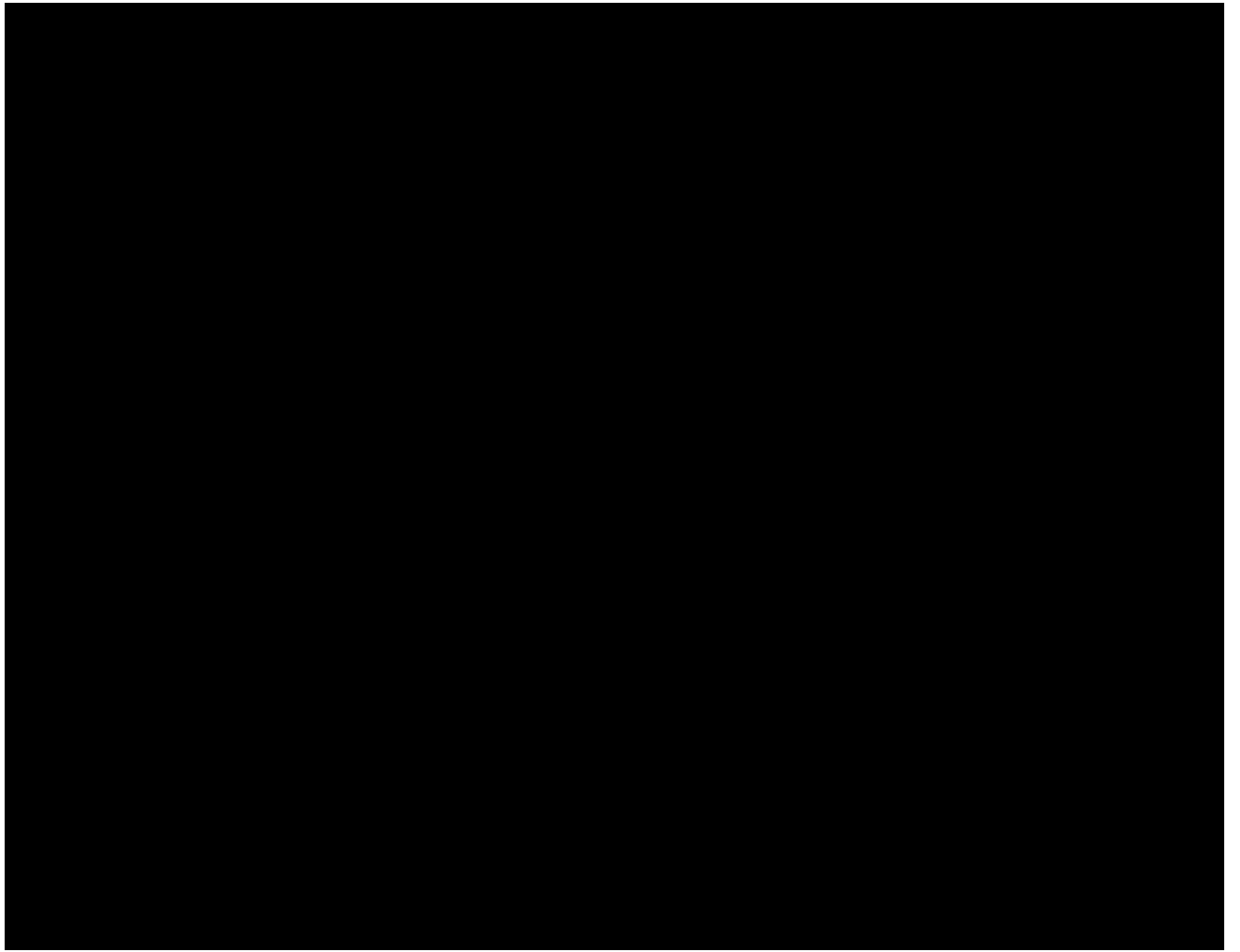




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[The following text is a dense, continuous block of text, likely a scan of a document page. It contains numerous words and phrases, many of which are repeated or appear to be part of a list or index. The text is mostly illegible due to the quality of the scan and the density of the characters. It appears to be a list of names or terms, possibly related to a historical or scientific study. The text is organized into several columns, suggesting a table or a structured list. The words are often small and closely packed together, making it difficult to read. The overall appearance is that of a very old or poorly preserved document.]





Appendix 4 STHF Rules 2018 and applicability to operations at Manston RC

Summary of the Short-Term Holding Rules 2018 (as amended in 2022) and applicability to operations at Manston Reception Centre.

1. Introduction

The Short-Term Holding Facility (STHF) Rules 2018, as amended by the Short-Term Holding Facility (Amendment) Rules 2022, provide the statutory framework for the operation of facilities used to detain individuals under immigration powers for short periods. These rules distinguish between different types of facilities - **holding rooms**, **residential holding rooms (RHRs)**, and **residential STHFs** - each with specific operational standards, time limits, and legal obligations.

Manston Reception Centre, operated by SBOC since December 2021, functions under these rules but is **not designated as a full STHF**. Instead, it operates under **Rule 6 (holding rooms)** and **Rule 6A (residential holding rooms)**, reflecting its role as a **processing centre** rather than a fully detained facility.

2. Overview of the STHF Rules 2018

The STHF Rules 2018 were introduced to regulate the treatment of detained persons and the management of short-term holding facilities. They cover:

- **Admission and discharge procedures**
- **Detention conditions**
- **Rights and welfare of detainees**
- **Staff responsibilities**
- **Security and safety protocols**

The rules apply to both **directly managed** and **contracted-out** facilities, with specific provisions for each type.

Key Definitions (Rule 2)

- **Holding Room:** A non-residential facility where individuals may be detained for up to 24 hours.
- **Residential Holding Room (RHR):** Introduced in the 2022 amendment, allowing detention for up to 96 hours, extendable in exceptional circumstances.
- **Manager:** A certified Detainee Custody Officer (DCO) responsible for overseeing operations.

3. Rule 6 – Holding Rooms

Holding rooms are designed for **short-term detention (up to 24 hours)**. They are typically used for initial processing, security checks, or prior to removal. Rule 6 outlines:

- **Time limits:** 24 hours, extendable only in exceptional circumstances.
- **Disapplication of certain rules:** Due to the limited nature of holding rooms, many provisions applicable to residential STHFs are either modified or disapplied.
- **Operational standards:** Basic hygiene, food, and safety requirements must be met.

Modifications for Holding Rooms

Holding rooms are exempt from several rules that apply to residential STHFs, including:

- Rule 14 (Sleeping accommodation)
- Rule 20 (Time in open air)
- Rule 29 (Internet access)
- Rule 35 (Removal from association)
- Rule 48 (Visitors)

These exemptions reflect the short duration and limited infrastructure of holding rooms^[1].

4. Rule 6A – Residential Holding Rooms (RHRs)

The 2022 amendment introduced **Rule 6A**, creating a new category of facility - **Residential Holding Rooms** - to address operational challenges, particularly at high-volume sites like Manston.

Key Provisions of Rule 6A

- **Detention limit:** Up to 96 hours, extendable by the Secretary of State in exceptional circumstances.
- **Modified rules:** Several rules are applied in modified form to reflect the semi-residential nature of RHRs.
- **Disapplied rules:**
 - Rule 24 (Correspondence)

- Rule 29 (Internet access)
- Rule 35 (Removal from association)
- Rule 37 (Temporary confinement)
- Rule 48 (Visitors)

Modified Rules for RHRs

- **Rule 13 (Accommodation):** Rooms must be certified for health standards.
- **Rule 14 (Sleeping accommodation):** Separate sleeping areas by sex where possible.
- **Rule 15 (Families and minors):** Family life must be respected; children must be safeguarded.
- **Rule 23 (Outside contacts):** Communication allowed unless it compromises security.
- **Rule 27 (Legal adviser):** Confidential meetings permitted.
- **Rule 30 (Medical screening):** Must occur within 24 hours.
- **Rule 31 (General medical care):** Prompt access to healthcare.
- **Rule 32 (Special illnesses and conditions):** Immediate risks must be reported and reviewed[\[2\]](#).

5. Applicability to Manston Reception Centre

Operational Context

Manston Reception Centre is a **non-designated STHF** used primarily for **processing migrants arriving via small boats**. It is not a full detention centre but operates under **STHF Rule 6 and 6A**, allowing for both 24-hour and 96-hour detention depending on operational needs.

- **SBOC has operated Manston since December 2021**
- **Manston is not a full STHF**
- **Planning permission** reflects its role as a **processing centre**, not a detention facility

Use of Holding Rooms and RHRs

- **Holding Rooms (Rule 6):** Used for routine processing when arrival volumes are manageable.

- **Residential Holding Rooms (Rule 6A):** Activated during surges in arrivals to allow extended processing time.

This dual-use model enables flexibility while maintaining compliance with legal standards.

6. Equality and Welfare Considerations

The **Equality Impact Assessment** for RHRs highlights:

- **Children and vulnerable individuals** are prioritized for processing to minimize detention time.
- **Healthcare screening** within 24 hours ensures early identification of medical or mental health needs.
- **Safeguarding protocols** are embedded in modified rules for RHRs.
- **Disability and age-related impacts** are mitigated through tailored care and prioritization[\[3\]](#).

These considerations are particularly relevant at Manston, given the diverse and vulnerable nature of the migrant population.

7. Compliance and Monitoring

Manston must adhere to:

- **National Holding Room Standards (NHRS)**, including annexed requirements for hygiene, safety, and welfare.
- **Independent Monitoring Board (IMB) and HMIP recommendations**
- **Health & Safety protocols**, including certified construction materials and designated search areas

Any deviations must be reported to the **Escorting Contract Monitoring Team (ECMT)**, ensuring accountability and transparency.

8. Conclusion

The Short-Term Holding Facility Rules 2018, as amended in 2022, provide a robust legal framework for the operation of facilities like Manston Reception Centre. By utilising **Rule 6 and Rule 6A**, Manston operates within a **flexible, legally compliant model** that balances operational efficiency with detainee welfare.

References

- [1] [Short-term Holding Facility Rules 2018.docx - GOV.UK](#)
- [2] [The Short-term Holding Facility \(Amendment\) Rules 2022](#)
- [3] [Equality impact assessment: residential holding rooms - GOV.UK](#)

Appendix: Full Text of Applicable Rules

To assist understanding how the ITPC and MRC are governed, the full text of the relevant rules Rule 6 (Holding Rooms) and Rule 6A (Residential Holding Rooms) is provided below.

Rule 6 – Holding Rooms

(1) These Rules apply to holding rooms subject to the modifications in this rule.

(2) The following rules do not apply to holding rooms

- (a) rules 13 to 16;
- (b) rules 18 to 22;
- (c) rules 24 to 29;
- (d) rules 31 to 37;
- (e) rules 39 to 41;
- (f) rules 43 to 45;
- (g) rules 47 and 48;
- (h) Part 6.

(3) Rule 17 applies to holding rooms as if:

(a) in paragraph (1), for “residential holding facility” there were substituted “holding room”; and

(b) in paragraph (2), for “residential holding facility” there were substituted “holding room”.

(4) Rule 23 applies to holding rooms as if:

(a) in paragraph (1), for “residential holding facility” there were substituted “holding room”; and

(b) in paragraph (2), for “residential holding facility” there were substituted “holding room”.

(5) Rule 30 applies to holding rooms as if:

(a) in paragraph (1), for “residential holding facility” there were substituted “holding room”; and

(b) in paragraph (2), for “residential holding facility” there were substituted “holding room”.

(6) Rule 23 applies to holding rooms as if it were substituted by the following rule:

“Outside contacts

(1) A detained person in a holding room may communicate by telephone with other persons outside the holding room in which they are detained.

(2) Paragraph (1) does not apply where such communication would prejudice the security of the holding room or the safety of any person.”

(7) Rule 31 applies to holding rooms as if it were substituted by the following rule:

“General medical care

(1) Where a detained person in a holding room becomes ill or sustains an injury which requires medical attention from a health care professional, the detained person must be provided with prompt access to a health care professional.

(2) Where a detained person requires medical attention from a health care professional as a result of a pre-existing illness or injury which they had on their initial admission to detention, the detained person must be provided with prompt access to a health care professional.”

Rule 6A – Residential Holding Rooms

(1) These Rules apply to residential holding rooms subject to the modifications in this rule.

(2) The following rules do not apply to residential holding rooms:

(a) rules 24 and 29;

(b) rules 35 and 37;

(c) rule 48.

(3) Rule 13 applies to residential holding rooms as if it were substituted by the following rule:

“Accommodation

(1) A detained person in a residential holding room must be provided with sufficient accommodation.

(2) No room shall be used for sleeping accommodation unless it has been certified by the Secretary of State as adequate for health in terms of its size, lighting, heating, ventilation and fittings.”

(4) Rule 14 applies to residential holding rooms as if it were substituted by the following rule:

“Sleeping accommodation

14. A detained person in a residential holding room must be provided with separate sleeping accommodation from detained persons of the opposite sex, where possible.”

(5) Rule 15 applies to residential holding rooms as if it were substituted by the following rule:

“Families and minors

(1) Where members of the same family are detained in a residential holding room, they are entitled to enjoy family life in the residential holding room save to the extent necessary in the interests of safety and security.

(2) A detained family or an unaccompanied minor under the age of 18 must be provided with sleeping accommodation in a residential holding room that cannot be accessed by unrelated detained adults, where practicable.”

(6) Rule 23 applies to residential holding rooms as if it were substituted by the following rule:

“Outside contacts

(1) A detained person in a residential holding room may communicate by telephone with other persons outside the residential holding room in which they are detained.

(2) Paragraph (1) does not apply where such communication would prejudice the security of the residential holding room or the safety of any person.”

(7) Rule 30 applies to residential holding rooms as if it were substituted by the following rule:

“Medical screening

30. A detained person in a residential holding room must be screened by a health care professional within 24 hours of admission to the residential holding room, except where this is not possible due to exceptional circumstances.”

(8) Rule 31 applies to residential holding rooms as if it were substituted by the following rule:

“General medical care

31. Where a detained person in a residential holding room becomes ill or sustains an injury which requires medical attention from a health care professional, the detained person must be provided with prompt access to a health care professional and any arrangements made for supervision, care or transfer to hospital that appear necessary to the manager.”

(9) Rule 32 applies to residential holding rooms as if it were substituted by the following rule:

“Special illnesses and conditions

(1) If during the medical screening carried out in accordance with rule 30, the health care professional identifies any immediate risk to the detained person’s health, the health care professional must notify the manager of the risk.

(2) The manager must ensure that the detained person’s detention is reviewed as soon as practicable.

(3) Any arrangements must be made in accordance with rule 31.”



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