



Ministry of Housing,  
Communities &  
Local Government

Donald Smith  
Director  
Border Security Command  
Small Boat Operations  
Home Office

Sent by e-mail only to:

[REDACTED]

**Please ask for:** Crown Casework Team  
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**Your ref:** N/A  
**Our ref:** PCU/RARE/Z2260/3368364

**Date:** 24 February 2026

Dear Mr Smith,

**The Town and Country Planning Act 1990 – Sections 293B-293E  
The Town and Country Planning (Crown Development) (Urgent Applications)  
(Procedure) (England) Order 2025.**

**Application by the Home Office for retrospective planning permission for an Initial Triage Processing Centre (“ITPC”) and full planning permission for a temporary training facility, permanent Reception Centre and training facility and associated works at Manston, Kent.**

**Planning application no: PCU/RARE/Z2260/3371969**

**Date Validated: 22 October 2025**

*This decision was made by the Secretary of State for Housing, Communities and Local Government, the Rt Hon Steve Reed MP.*

1. The Secretary of State has considered the Appraisal Report (“the AR”) (at **Annex A**) of the above planning application, pursuant to Section 293B(6) and the responses received as a result of the consultation undertaken in accordance with s.293C(2), of the Town and Country Planning Act (“TCPA”) 1990 and The Town and Country Planning (Crown Development) (Urgent Applications) (Procedure) (England) Order 2025 (“the 2025 Order”).

2. For the reasons given below, the Secretary of State agrees with the conclusions of the AR, except where stated, and has decided to grant planning permission subject to conditions at **Annex B**, pursuant to Section 293C(4) TCPA 1990 and the 2025 Order.
3. All references to paragraph numbers, unless otherwise stated, are to the AR.

## **Procedural Matters**

### **Appraisal Report**

4. The AR has been jointly prepared by planning professionals at Lichfields and MHCLG officials from the Crown Casework Team. It is a professionally commissioned assessment, and its conclusions represent the planning judgement of Lichfields. All members of the Lichfields team are chartered town planners and members of the Royal Town Planning Institute, governed by the RTPI Code of Professional Conduct. The purpose of the AR was to provide the Secretary of State with expert advice on the merits of the proposed development, having regard to the relevant planning considerations, including the main planning issues. In addition to the AR, the Secretary of State has also considered all application supporting materials and consultation responses.

### **Sensitive Information**

5. The Secretary of State has determined, following a review of the request set out in National Security Statements from the Home Office, that the information contained within some planning application supporting documents submitted meets the criteria in section 293B(11) of the TCPA 1990 for classification as “sensitive”. Article 12 of the 2025 Order provides that provisions of the 2025 Order which would otherwise require disclosure of information relating to or contained within an application do not apply in respect of information deemed sensitive. The Secretary of State has therefore determined that the information identified in **Annex C** relates to matters of national security, or measures taken or to be taken to ensure the security of premises or property, and that its public disclosure would be contrary to the national interest. Accordingly, the information identified in **Annex C** is classified as “sensitive” for the purposes of section 293B (10) of the TCPA 1990 and Article 12 of the 2025 Order. In advising the Secretary of State, both Lichfields and the MHCLG Crown Casework Team have had full access to all sensitive information.

### **Procedural History**

6. The Urgent Crown Development planning application was received on 26 July 2025 and validated on 22 October 2025. The determination of both National Importance and Urgency was made on 26 August 2025, by the Minister of State for Housing and Planning. The application was consulted upon with the parties at **Annex D** between 03 November 2025 to the 11 November 2025.

### **Alternative Sites**

7. In accordance with established planning principles, the Secretary of State notes that there is no legal or policy requirement for the Home Office to assess or present alternative sites for this form of development. Case law

makes clear that proposals of this type are to be determined on their own planning merits, and that there is *“no national planning policy or guidance advice that requires the Home Office to adopt a specific sequential approach in selecting the site”* for the detention and processing of individuals arriving irregularly in the UK. Even if other potentially suitable sites existed, **AR 4.51** notes that these may reasonably be required in addition to, rather than instead of, Manston given the scale and urgency of operational need. The application is therefore appropriately determined without a comparative alternative sites exercise, and the suitability of the Manston site has been assessed on its planning merits alone.

## **Environmental Impact Assessment and Habitats Regulations**

8. The Secretary of State has had regard to the Town and Country Planning (Environmental Impact Assessment (“EIA”)) Regulations 2017 (“the EIA Regulations”). He notes that the proposal, both retrospective and planned developments, were screened and classified as a Schedule 2 urban development project because the site exceeds 5 hectares as detailed in **AR 1.26**. For the reasons given at **AR 1.28**, and taking into account the selection criteria in Schedule 3 to the EIA Regulations, the Secretary of State does not consider the proposal is likely to have significant effects on the environment. Please see the statement at Appendix 3 of the AR which gives reasons for this direction.

The Secretary of State is the competent authority for the purposes of the Conservation of Habitats and Species Regulations 2017 (“the Habitats Regulations”). He has had regard to the Habitats Regulations Assessment (“HRA”) Stage 1 screening assessment, which found no likely significant effects on European sites. The Secretary of State is of the view, in light of that assessment and all the evidence, the project is not likely to have significant effects on European Sites, such that a Stage 2 Appropriate Assessment is not necessary. The Secretary of State does not propose any specific planning conditions directly related to the HRA .

9. In reaching this conclusion, the Secretary of State has had regard to the EIA Screening Direction, which determined that the proposed development does not constitute EIA development. However, that conclusion relies on a number of embedded mitigation measures that are necessary to ensure that the development does not give rise to significant environmental effects. To secure these safeguards, planning conditions are imposed requiring further investigation, detailed design, management plans and operational controls relating to matters including contamination and groundwater protection, flood risk and drainage, biodiversity, lighting, noise, construction impacts, and highway mitigation. These conditions are considered reasonable and necessary to ensure that the environmental effects of the development remain acceptable and that the basis of the EIA screening conclusion is maintained throughout construction and operation.

## Consultation

10. As outlined in **AR 1.41-1.43** and Appendix 5, statutory consultation on this proposed development. was undertaken between 3 November and 11 November 2025, with responses from Thanet District Council, Kent County Council, the Environment Agency, Natural England, National Highways, the Ministry of Defence, and others. No objections were raised by statutory consultees, subject to the imposition of appropriate conditions.
11. Further submissions and clarifications were provided by the Home Office up to December 2025, forming the complete basis on which the application is now assessed. The Secretary of State is satisfied that no further consultation with statutory consultees was required as there were no fundamental changes to the application arising from the further submissions and clarifications. The Secretary of State has determined this application on the basis of the documents submitted by the Home Office listed at Appendix 2 of the AR, in support of the Urgent Crown Development proposal.

## Planning History

12. The former RAF Manston site has a history as a military installation, most recently occupied by the Fire Service Training Establishment, an Army Reserve Unit and Air Cadet Squadron until 2021. The Home Office took possession of the site in December 2021, establishing the ITPC at speed in response to unprecedented small boat arrivals. This initial use took place without planning permission, and the current application seeks retrospective consent for that development.
13. Between 2023 and 2025, several 'Prior Approval' applications were submitted to Thanet District Council ("the Council") for the demolition of redundant buildings; in each case, the Council confirmed that 'Prior Approval' was not required. Apart from these demolition decisions, historic planning records comprise only small-scale operational developments associated with the former military use and scale operational developments associated with the former military use.
14. In developing proposals for the permanent Manston Reception Centre ("MRC"), the Home Office undertook preapplication engagement with local authorities, statutory bodies, and stakeholders from 2023 onwards. The application was formally submitted on 26 June 2025 for determination under the Urgent Crown Development procedure (TCPA 1990, s.293B). The Secretary of State accepted the application as meeting the statutory tests of national importance and urgency on 26 August 2025.

## Consideration of the Development Plan

15. The relevant adopted Development Plan comprises the Thanet Local Plan (2020), the Kent Minerals and Waste Local Plan (2025), and the Kent Mineral Sites Plan (2020) (**AR 3.2**). The site is not allocated for residential or employment development and lies outside the urban area boundary; it is therefore treated as 'countryside' for policy purposes as outlined in **AR 4.31**.

16. The Secretary of State agrees with the AR that the development comprises the redevelopment of a brownfield site outside of the settlement boundary. While development of this scale would not ordinarily be compatible with its rural setting, the site's historic RAF use and existing built form make it appropriate for reuse. The Secretary of State further agrees that the National Planning Policy Framework ("NPPF") supports the effective use of previously developed land and provides flexibility for nationally significant planning proposals (AR para 4.5). The Secretary of State agrees with the AR that the scheme largely reuses existing infrastructure within a defined development zone and benefits from the site's secure nature and strategic location near Dover (AR paras 4.43 and 4.57).
17. The Secretary of State notes the list of policies contained in the Local Plan which are relevant to the development: **AR 3.4**. The Secretary of State's decision and consideration of the main issues takes into account relevant policies in the Development Plan and other material considerations, including the NPPF and National Planning Practice Guidance, where applicable.

### **Further Matters**

18. On 11 February 2026, the Home Office wrote to the Department stating that an internal funding decision has been made to pause the development of the permanent MRC at this time, with further options to be considered on the site. The Home Office has subsequently confirmed that there is no change to the factual basis of the application and intends to build the permanent scheme sought. In light of this, the Secretary of State has proceeded to determine the application on the basis of the proposals set out in the planning application and has taken into account the correspondence in so far as it impacts on his decision as set out below.

### **Main Issues**

#### **Need for the development.**

##### *Need for a Triage and Processing Centre and Training Facilities*

19. The Secretary of State agrees that the Home Office has provided evidence of a significant increase in irregular migration via small boat crossings since 2018, a trend that is likely to continue, if not intensify as a result of global crises and instability. For the reasons given at **AR 4.7**, the Secretary of State considers that the proposed development is required to enable the Home Office to meet its statutory duties in relation to immigration control, as prescribed in Schedule 2 of the Immigration Act 1971 and Part 11 of the Immigration Rules, and the processing of individuals arriving irregularly in the United Kingdom.
20. Having regard to the application documents, the Secretary of State further agrees that without these facilities, there would be severe implications for both the Home Office and asylum seekers with the risk of being in breach of domestic and/or international obligations in respect of reception arrangement

for asylum seekers, the use of asylum hotels would be prolonged (contrary to Government policy to exit all asylum hotels by the end of this Parliament), and there would be a real risk that asylum seekers could not be adequately housed and their basic needs met so that they are not destitute.

21. The Secretary of State has carefully considered the consequences of refusing planning permission. The AR outlines that the existing ITPC was established at speed in December 2021 to respond to unprecedented levels of irregular small boat arrivals (**AR 4.10**), and that the infrastructure currently in place is temporary, sub-optimal, and operating without the benefit of planning permission. The AR notes that irregular migration via the Channel remains a national security concern, with sustained and unpredictable inflows placing significant pressure on the Home Office's operational capacity from boat arrivals.
22. If permission were not granted, the Home Office would be unable to regularise the existing ITPC or deliver the permanent MRC, which is required to meet the statutory duty to identify and process individuals arriving irregularly into the United Kingdom. The AR further records that the existing ITPC infrastructure is inefficient and not designed for long-term use (**AR 4.26**), resulting in operational bottlenecks that risk delays to security checks, biometrics collection, asylum screening, and dispersal. Failure to replace the ITPC with purpose-built facilities would therefore risk recurrence of the operational pressures that contributed to the 2022 overcrowding incident (**AR 4.11**), with potential welfare, legal and safeguarding consequences.
23. In addition, refusal would require the Home Office to identify and establish alternative facilities at short notice. The AR outlines that the Manston site is uniquely suited to this operational purpose, being in Government ownership (**AR 4.55**), close to the short straits, and of a scale that allows the Home Office and Border Force to manage arrivals rapidly and securely (**AR 4.13**). If permission were refused, the Home Office would likely be unable to stand up equivalent capacity elsewhere within the urgent timescales required. This would have severe implications for national security, border management, and the Government's ability to comply with its statutory responsibilities.
24. The Secretary of State is satisfied that it is necessary for the training facilities to be located at Manston given the site's strategic role in frontline border operations, its existing secure Government owned environment, and its capacity to accommodate specialist training infrastructure safely alongside processing functions. The co-location of training with the triage and reception centre enables Border Force and Immigration Enforcement personnel to train within the operational setting they will deploy in, ensuring efficiency, operational readiness and resilience. The scale, security and configuration of the Manston site cannot be readily replicated elsewhere without delay or significant additional cost, and no alternative site would provide the same operational integration or deliverability within the urgent timescales required. For these reasons, the Secretary of State affords very significant weight to the need to deliver the training facilities at this site.

25. Accordingly, the Secretary of State considers that refusal of planning permission would result in the Home Office being unable to lawfully continue operating the existing ITPC or deliver the purpose-built MRC, resulting in the loss of critical national border security infrastructure. This would undermine the Secretary of State's statutory duty to safely and efficiently process irregular arrivals, increase the risk of welfare, safeguarding and operational failures associated with continued reliance on temporary facilities, and create significant legal, financial and operational risks for wider Government. The benefits of a fit-for-purpose facility; including improvements to processing efficiency, detainee welfare, training capacity, and mitigation of previously identified system pressures, would not be realised. No suitable alternative site has been identified to meet this urgent and nationally important need which the MRC undertakes, which would result in the loss of critical national border security infrastructure. This would undermine the Secretary of State's statutory duty to safely and efficiently process irregular arrivals, increase the risk of welfare, safeguarding and operational failures associated with continued reliance on temporary facilities, and create significant legal, financial and operational risks for Government. The benefits of a fit-for-purpose facility—including improvements to processing efficiency, detainee welfare, training capacity, and mitigation of previously identified system pressures—would not be realised, and no suitable alternative site has been identified to meet this urgent and nationally important need.
26. For the reasons given at **AR 4.27**, the Secretary of State agrees that the proposed development would support national security by ensuring the Home Office has an appropriate facility to be able to identify and ascertain the circumstances of those arriving in the UK by irregular means. Further, the Secretary of State agrees with **AR 4.28** that the proposed development would provide the necessary infrastructure to meet and support national security needs and therefore accords with Paragraph 102 of the NPPF.
27. For the reasons given at **AR 4.16**, the Secretary of State agrees that the proposed development would provide an urgently required training facility in order that the Home Office can meet its own training needs, notably for staff who escort detained persons. Overall, the Secretary of State gives the matter of need very significant weight.
28. The correspondence dated 11 February 2026 referred to at paragraph 18 of this letter has been considered, and does not offer evidence to the contrary to the findings in respect of need and capacity. The assessment above has not changed in light of this additional information as the scheme has not changed and no indication has been given that the need of the MRC has decreased or increased. Accordingly, other impacts of the scheme have also not changed.

## **Access and Transport**

29. The submitted Transport Assessment ("TA") confirms that the Spitfire Way / Manston Road (B2050) junction is already operating over capacity, with "excessive" queuing in the existing situation, particularly during the PM peak (up to 72 Passenger Car Equivalents ("PCUs")) even before the proposed development traffic is added. The introduction of ITPC operations,

construction traffic and later the full MRC operational flows would each worsen this overcapacity condition, with modelling showing further increases in queues (up to 90 PCUs during ITPC operations and up to 122 PCUs during MRC construction). These impacts would lead to significant additional delay, deterioration in junction performance, and wider knock-on effects on the local network. Under both phased and long-term “layered” scenarios, the TA identifies that the junction would fail without mitigation, meaning development traffic would materially exacerbate existing congestion and contribute to severe residual impacts in the absence of intervention.

30. As a result, the AR concludes that the proposal would have a negative and material impact on an already over-stressed part of the highway network, necessitating the delivery of strategic mitigation—specifically the new roundabout—to ensure the junction can operate within capacity and to avoid the development giving rise to severe transport impacts.
31. The Secretary of State notes that traffic modelling indicates the site access junction would operate within capacity; however, the AR and Kent County Council (“KCC”) Highways both identify that the Manston Road/B2050/Spitfire Way junction is already over capacity and would be further stressed by the proposed development (**AR 4.86-4.87**). Thanet Local Plan Policy SP45 states that development will only be permitted only as such time as proper provision is made to ensure delivery of relevant transport infrastructure. To address this, the Secretary of State agrees that junction improvements—including a new roundabout at Spitfire Way—must be completed before the MRC becomes operational, secured through a planning condition (**AR 4.93**).
32. Planning conditions will also require submission of a Travel Plan, Car Park Management Plan, and Construction Traffic Management Plan (“CTMP”) within six months of the decision to manage impacts, promote sustainable travel, and limit parking to 800 spaces (with 25% EV charging provision) (**AR 4.101**).
33. A Travel Plan Framework prepared for the site promotes sustainable travel through public transport enhancements, shuttle buses, carsharing, EV charging, and cycle parking, while the CTMP outlines measures to minimise disruption during construction, including routing strategies and limiting peak traffic periods.
34. Overall, the Secretary of State considers that subject to the proposed mitigation measures secured by planning conditions, the impacts of the development on highway safety or the road network are not considered to be severe, and the Secretary of State is satisfied that the proposal is acceptable in transport terms, complying with relevant parts of paragraphs 109, 115-118 of the NPPF and Thanet Local Plan Policies SP45 and SP47 (**AR 4.109**) and would carry moderate weight against the proposed development (**AR 6.11**).

### **Land contamination and ground conditions**

35. The Secretary of State notes there are contamination risks on the site linked to historic RAF activities. These include ground gas risk, which has been assessed as very low, asbestos and elevated lead concentrations in ‘Made



Ground', which poses a health hazard if disturbed, unexploded ordnance ("UXO"), and leaching contaminants, particularly per-and poly fluoroalkyl from historic fire training areas, which could impact on groundwater.

36. The Secretary of State agrees with the AR that further ground investigations will be required and that planning conditions should be imposed to secure a detailed remediation strategy, UXO risk management, and verification reports before construction commences.
37. In addition, the Environment Agency ("EA") has confirmed it has no objection to the proposed development, provided that planning conditions are imposed to safeguard controlled waters and human health, with requirements for ground investigation, contamination remediation, and detailed foul and surface water drainage strategies (**AR 4.128**).
38. In assessing land contamination, the Secretary of State has had explicit regard to paragraphs 196(a) and 197 of the NPPF. He is satisfied, on the basis of the Ground Investigation Report, radiological surveys and the proposed programme of investigation, remediation and verification secured by condition, that the site can be made *suitable for its proposed use* taking account of ground conditions and the risks arising from contamination, as required by NPPF 196(a). In accordance with NPPF 197, the Secretary of State recognises that responsibility for securing a safe development rests with the developer and landowner, and the conditions imposed ensure that the necessary remedial measures are implemented and evidenced. The Secretary of State has also considered Policy SE03 of the Thanet Local Plan, noting its requirement that remedial measures be secured *before occupation*. Given the particular circumstances of this case—namely that the Crown is already in occupation of the site for operational reasons—the Secretary of State concludes that compliance with Policy SE03 is achieved through the imposition of robust, enforceable conditions requiring investigation, remediation and verification prior to the occupation of any *new authorised development*, thereby ensuring that the policy objective of securing a safe and suitable site is met notwithstanding the existing use.
39. For the reasons given at **AR 4.134**, the Secretary of State agrees that there is a potential risk from the site's geology and soils to human health receptors and controlled waters. However, for the reasons given at **AR 4.135**, the Secretary of State agrees that this risk can be mitigated through the provision of planning conditions relating to investigation, remediation, and management of contamination. Given this finding, the Secretary of State considers this matter carries limited weight against the proposed development.
40. Overall, the Secretary of State agrees with the conclusions of the AR and considers that proposal is acceptable in contamination and groundwater terms, complying with relevant parts of Paragraph 180 of the NPPF. However, the Secretary of State considers that the proposal does conflict with local planning policy SE03 (Land Affected by Contamination) of the Thanet Local Plan (2020) relating to land affected by contamination, disagreeing with the findings in the AR. The Secretary of State notes the unknown risks but considers them sufficiently small and controllable. The Secretary of State

notes that the site is already in operation. However, the Secretary of State considers that, with the proposed mitigation above, any harm carries limited weight against the proposed development.

### Heritage considerations

41. The Secretary of State notes that there is only one designated heritage asset within the wider study area (Grade II listed Cheesman's Farm (NHLE 122803). However, for the reasons given at **AR 4.156**, the Secretary of State agrees that there would be no impacts from the proposed development on this heritage asset.
42. The Secretary of State notes that the site includes several non-designated military heritage assets from the 20th century, such as former residents' huts, pillboxes, and a Chain Home Low Station. The impacts from the proposed development include disturbance or loss of sub-surface remains of the former residents' huts and pillbox locations, but the Secretary of State notes that most remains within the site have been removed or destroyed, leaving limited historical fabric. For the reasons given at **AR 4.162**, the Secretary of State agrees that there will be no harm to designated heritage assets as a result of the proposed development.
43. Overall, the Secretary of State agrees with the conclusion of the AR that mitigation to impacts on non-designated heritage assets should be secured through planning conditions requiring archaeological recording during demolition and redevelopment and sharing records with the Kent County Archive (**AR 4.159**). With these measures in place, he considers the proposal acceptable under paragraphs 202–218 of the NPPF and Policies HE01 (Archaeology) and HE03 (Heritage Assets) of the Thanet Local Plan (2020).

### Character and Appearance

44. For the reasons given at **AR 4.186**, the Secretary of State agrees that the proposed development would not result in significant effects on landscape character at a national or regional level but there would be noticeable changes at a local level, with a visual effect on some residential properties where they have filtered views towards the site.
45. In reaching this conclusion, the Secretary of State has had regard to the full landscape assessment set out at **AR 4.172-4.187**. The Secretary of State agrees with the judgements taken and the conclusions reached in this section of the AR. These paragraphs provide the underlying reasoning as to why, despite some localised changes to character and views, the development would not give rise to significant landscape effects. The assessment explains that the site is already a visually enclosed, previously developed and partly screened military complex; that the surrounding landscape has a moderate sensitivity to change; that effects would be limited to the immediate vicinity; and that the proposed form, scale and siting of development would be contained within the established built envelope. **AR 4.186 - 187** draws together this analysis and concludes that, in this context, the visual effects—although adverse in places—would be slight and not significant, particularly once the proposed mitigation planting has matured. The Secretary of State

agrees with this reasoning and is satisfied that the proposal would not result in significant landscape impacts.

46. The Secretary of State considers that the proposed development conflicts with local planning policy SP26 (Landscape Character Areas) of the Thanet Local Plan (2020) as no information has been submitted with the application to demonstrate that the design and materials will conserve and enhance Thanet's local distinctiveness. This assessment is contrary to findings in the AR. However, conditions will require detailed design submissions for buildings and fencing to ensure high-quality, sympathetic development. The Secretary of State considers this matter carries limited weight against the proposed development.

### **Flood Risk and Sequential Test**

47. The Secretary of State has had regard to the submitted Flood Risk Assessment, which confirms that the site lies within Flood Zone 1, with a very low probability of fluvial or tidal flooding. The assessment identifies an historic surface water flow path traversing the southwestern part of the site, resulting in a medium risk of surface water flooding, and thereby necessitating the application of the 'Sequential Test'. In this respect, the Secretary of State considers the Sequential Test undertaken by the Home Office to be limited, but overall, the deficiencies are not considered sufficient to justify refusal in the context and given the nature and locational requirements of the proposals. However, the Secretary of State concludes that the exception test is not required by Planning Practice Guidance on Flood Risk and Coastal change, which includes Table 2: Flood risk vulnerability and flood zone compatibility. The applicant's Flood Risk Assessment explains that no reasonably available alternative sites at lower flood risk exist to accommodate the operational requirements of the development, and that a shift to greenfield land would conflict with national and local policy objectives supporting the redevelopment of previously developed land.
48. To mitigate identified risks, the proposal incorporates measures including raising finished floor levels by up to 450mm and delivering a site-wide package of sustainable drainage systems ("SuDS"), incorporating infiltration features, bioretention systems and attenuation appropriate to the site's hydrogeological context. The Flood Risk Assessment demonstrates that with these measures in place, the development can be made safe for its lifetime and would not increase flood risk elsewhere.
49. To address drainage matters, planning conditions will secure detailed drainage designs, phased delivery of SuDS, and odour management for any temporary foul water treatment. The Secretary of State agrees with **AR 4.218** that these measures would mitigate environmental impacts and ensure the proposal accords with paragraph 181 of the NPPF and Policies CC01 and CC02 of the Thanet Local Plan (2020), providing effective flood risk management. Subject to these conditions, he considers the proposal acceptable in flood risk terms and that this matter carries limited weight against the proposed development.

50. On this basis, the Secretary of State is satisfied that the proposal is compliant with paragraph 181 of the NPPF. However, the Secretary of State considers that the proposed development does conflict with local planning policy CC01 (Fluvial and tidal flooding) due to the site already being operational, which is contrary to the findings of the AR. Nevertheless, the Secretary of State considers that planning conditions will secure detailed drainage designs, phased delivery of sustainable drainage systems (“SuDS”), and odour management for any temporary foul water treatment and any harm carries limited weight against the proposal.

## **Biodiversity**

51. The Secretary of State notes that the site is not within any statutory or non-statutory designated nature conservation areas and that an HRA screening concluded no likely significant effects on European sites (**AR 1.35 and 4.269**). However, surveys identified priority habitats such as calcareous grassland of county importance, mature trees, and scattered scrub, along with species of concern including Basil Thyme, Lizard Orchid, and several red/amber-listed birds. The site also supports bats, badgers, and invertebrates.

52. Mitigation will be secured through planning conditions requiring updated ecological surveys, a LEMP, a Construction Environmental Management Plan (“CEMP”), and species-specific measures such as translocation of Basil Thyme and licensing for Lizard Orchid works (**AR 4.263 - 4.264**). Additional measures include bat boxes, dark corridors, and seasonal restrictions on vegetation clearance to protect nesting bats (**AR 4.248**). With these controls, the Secretary of State considers the proposed development acceptable under paragraph 187 of the NPPF and Policy SP30 (Biodiversity and Geodiversity Assets) of the Thanet Local Plan (2020).

53. The Secretary of States accepts the AR conclusion that a large number of trees are proposed for removal, the loss of which has not been justified (**AR 4.240**). He notes the ecological value of the mature trees and woodland on the site for a number of species including bats, birds, and invertebrates. A planning condition will require a schedule of Category A and Category B trees that will be removed prior to construction to be submitted and for there to be consideration of compensatory planting for the loss of trees/hedgerows (**AR 4.242**).

54. For the reasons given in **AR 4.272**, the Secretary of State considers the proposed development is acceptable under paragraph 187 of the NPPF and Policy SP30 (Biodiversity and Geodiversity Assets) of the Thanet Local Plan (2020). The Secretary of State agrees with **AR 6.10** that moderate weight should be attached to the associated adverse impacts on biodiversity, but with the imposition of the planning conditions this matter carries limited weight.

## **Noise**

55. The Secretary of State notes that there would be potential noise impacts from construction activities, site operations, and mechanical plant (**AR 4.278**) to receptors off-site (including nearby residential properties) and on-site

(including offices, accommodation in temporary holding facilities and welfare areas). He agrees that construction noise would be temporary and managed through a CEMP, including limits, monitoring, and mitigation measures. Additionally, the existing ITPC relies on generators that create higher noise levels than the proposed permanent facilities, which will use mains power (**AR 4.280**).

56. For the reasons given at **AR 4.287-4.289**, the Secretary of State agrees that noise impacts during construction and operation can be mitigated through the provision of planning conditions. Additionally, as future plant and equipment details are not yet confirmed, a condition will require submission of updated Noise and Vibration Impact Assessment reports before each development phase (**AR 4.290**).

57. With these measures, the Secretary of State considers the proposed development acceptable under paragraphs 187 and 198 of the NPPF and Policy SE06 (Noise Pollution) (para 5.54) of the Thanet Local Plan (2020). Given these findings, the Secretary of State considers this matter carries limited weight against the proposed development.

## Lighting

58. The Secretary of State notes that existing lighting installed around ITPC marquees and building entrances is outdated and inadequate (**AR 4.297**). He notes that there is also potential for impacts from light spill affecting nearby residential properties and sensitive ecological receptors, including bat roosts and commuting corridors (**AR 4.298**).

59. For the reasons given at **AR 4.301**, the Secretary of State agrees that lighting impacts can be mitigated through the provision of planning conditions. As the ITPC is operational now a planning condition is proposed requiring submission of a Lighting Strategy within 6 months, following the date of this decision, and prior to the installation of any further external lighting. This strategy would incorporate measures to minimise glare, light trespass, and sky glow, and to protect biodiversity. Temporary construction lighting will also be controlled through the CEMP.

60. With these measures, the Secretary of State considers the proposal acceptable under Policy SE08 of the Thanet Local Plan 2020 and paragraph 198 of the NPPF. Given this finding, the Secretary of State considers this matter carries limited weight against the proposed development.

## Air Quality

61. The Secretary of State notes that there would be potential air quality impacts from construction activities which generate dust with up to 3 sensitive receptors within 20m, 25 receptors within 20-50m and a further 37 receptors within 50-100m of the Site boundary. Air quality impacts from operations include additional traffic from staff vehicles, coaches, and deliveries, but the Secretary of State accepts the Air Quality Assessment's finding that these impacts would be negligible on human health (**AR 4.309**). He also accepts

that there is a current, temporary impact from diesel generators used at the existing ITPC, but notes that these will be replaced by mains power, with remaining generators used only as emergency backup (**AR 4.311**).

62. The Secretary of State agrees with the conclusion at **AR 4.314** that the proposed development would not result in adverse effects in relation to air quality and is acceptable under paragraphs 187 and 199 of the NPPF and Policy SE05 (Air Quality) of the Thanet Local Plan. The Secretary of State considers this matter carries limited weight against the proposed development.

## **Climate Change**

63. The Secretary of State notes that the Climate Change Resilience Assessment (“CCRA”) submitted with the application identified six hazard groups: extreme heat, heavy rainfall and flooding, storms, drought, subsidence, and wildfire. Of these, extreme temperatures, drought, and wildfire were considered high-likelihood risks, while heavy rainfall, low temperatures and storms were medium-likelihood (**AR 4.323**). Recommended mitigation measures include sustainable drainage systems, planting schemes and building design to mitigate overheating, alongside consideration of future climate projections for resilience.

64. For the reasons given at **AR 4.324-4.326**, the Secretary of State agrees risk reduction measures are adequately addressed through conditions, for example those requiring SuDS and planting details, and that additional planning conditions beyond standard Building Regulations are not required as they are considered sufficient to address climate risks. Overall, the Secretary of State agrees with **AR 4.329** that the proposed development is acceptable under paragraphs 164–166 of the NPPF and Policy SP37 of the Thanet Local Plan (2020). The Secretary of State considers this matter carries limited weight against the proposed development.

## **Material Assets and Waste**

65. The Secretary of State notes that the Operational Waste Management Strategy (“OWMS”) submitted with the application outlines assumptions for waste generated from both existing and future staff and detained persons, which are based on the application of British Standard indices, and provides overall waste generation estimates. These estimates comprise cardboard, mixed recycling, food, and residual waste.
66. Design recommendations to prevent excessive waste generation include baling cardboard, providing skips for mixed recycling and residual waste, and wheelie bins for food waste, with facilities management staff handling internal transfers and contractors managing collections (**AR 4.337**). In addition, planning conditions to protect the amenity of service users and staff from odour as well as providing final details of waste storage are proposed.
67. There are no minerals or waste policies which apply to this site from the Councils Waste Local Plan. The Operational Waste Management Strategy is

appropriate when the Council's Waste Local Plan is read as part of the Development Plan and will be secured through conditions.

68. Design recommendations to minimise waste include baling cardboard, providing skips for mixed recycling and residual waste, and wheelie bins for food waste, with facilities management staff handling internal transfers and contractors managing collections (**AR 4.337**). Planning conditions are also proposed to protect the amenity of service users and staff from odour and to secure final details of waste storage.
69. In respect of planning policy, the Secretary of State notes that there are no minerals or waste policies applicable to this site within the Council's Waste Local Plan. However, the OWMS is considered appropriate when that Plan is read as part of the Development Plan and will be secured through conditions. The Secretary of State has also had regard to the Kent Minerals and Waste Local Plan (adopted March 2025), which forms part of the statutory development plan, and concludes that the conditions — requiring detailed waste storage arrangements, construction-stage waste management and the safe handling and disposal of contaminated materials — ensure consistency with the Plan's strategic objectives, including waste minimisation, environmental protection and sustainable resource use.
70. Further, the Secretary of State has considered Policy SE03 of the Thanet Local Plan, which requires investigation and remediation "before occupation" where land is affected by contamination. Although the Crown is already in operational occupation of the site, the Secretary of State is satisfied that the robust and enforceable conditions requiring investigation, remediation and verification prior to the occupation or use of any new authorised development secure the same policy outcome.
71. Accordingly, the Secretary of State is satisfied the proposal accords with the Kent Minerals and Waste Local Plan and with Policy SE03 when read in the context of the existing operational use of the site and the comprehensive suite of contamination and waste related conditions attached to this permission.
72. In considering material assets and waste, the Secretary of State has also had regard to paragraph 8 of the NPPF and its requirement to pursue economic, social and environmental objectives in mutually supportive ways. The conditions imposed directly support these objectives: environmentally, by ensuring waste is managed safely, efficiently and without risk to human health or the natural environment; socially, by securing appropriate waste handling, storage and operational practices that protect the amenity of detained persons, staff and neighbouring communities; and economically, by ensuring the facility operates effectively with reliable waste management infrastructure. Taken together, these measures ensure the prudent use of resources, avoid unacceptable environmental effects, and contribute to achieving sustainable development in accordance with paragraph 8 of the NPPF.

## Health and Wellbeing of Existing Community

73. The Secretary of State notes that the AR considers the extent to which the proposed development will have an impact on availability and service level of healthcare for the wider population. He notes that the applicant has provided enhanced on-site healthcare facilities, including 24/7 emergency doctors and paramedics, screening for infectious diseases and isolation capacity, which significantly reduces pressure on local NHS services (**AR 4.349**). While some referrals to hospitals and pharmacies will occur, these impacts are expected to be limited and managed through liaison with NHS England and Kent & Medway Intensive Care Board (**AR 4.354**).
74. The Secretary of State recognises that lawful protest is capable of being a material planning consideration. Consistent with established authority, the public is generally expected to tolerate a degree of disruption from lawful protest; accordingly, only the land use effects reasonably attributable to this development — such as temporary congestion at site access points, noise and disturbance, and any brief interference with access for neighbours or emergency services — are treated as material. Generalised disagreement with Home Office policy is not a material planning consideration.
75. On the evidence before him, the Secretary of State finds that protest related risks are limited in magnitude and frequency given the site's secure characteristics (fenced and gated perimeter, 24/7 onsite security and CCTV) and the operational arrangements including a designated protest area identified at the Manston Road/Spitfire Way junction and ongoing liaison with Kent Police. These features mitigate the prospect of unlawful entry and confine any protest activity to the public realm outside the site. The principal material effect from protests would therefore be the potential for highway congestion at or near the access.
76. With respect to fear of crime, the Secretary of State gives very limited weight to generalised perceptions unlinked to land use effects. While the AR notes that negative publicity may heighten concerns in the local community and refers to potential effects on mental wellbeing, it also recognises that, as a detained and secure site, the fear of crime should be low. On the evidence before him, the Secretary of State does not find a sufficiently specific or proportionate evidential basis to conclude that lawful, managed protests would materially affect local healthcare capacity or amenity beyond the temporary and manageable effects already addressed by the traffic and management conditions. The Secretary of State therefore rejects the suggested linkage in the AR between a generalised fear of crime and material impacts on healthcare services.
77. For these reasons, the Secretary of State distinguishes between (i) security measures that manage risks within the site (relevant to detained persons) and (ii) the separate, protest related effects that may occur outside the site (assessed here only to the extent they manifest as land use impacts). Subject to the conditions imposed, any protest related amenity effects attract limited weight in the overall planning balance.



78. The Secretary of State considers this matter carries limited weight against the proposed development.

### **Residential Amenity**

79. In assessing the effects of the proposed development on the living conditions of neighbouring occupiers, the Secretary of State has had regard to the analysis contained in **AR 4.367-4.369**. That assessment confirms that residential properties to the west and northwest of the site benefit from separation distances, mature boundary vegetation and fencing, and a change in land levels, with built form along the western edge capped at 6 metres. These factors ensure that the development will not give rise to harmful overlooking, overbearing effects or loss of outlook.

80. Consistent with NPPF paragraph 135(f), the Secretary of State has considered whether the proposals secure a high standard of amenity for existing and future users. The AR identifies that construction phase impacts — including noise, vibration, dust, lighting and traffic movements — can be effectively mitigated through a comprehensive CEMP and Construction Traffic Management Plan (**AR 4.287 - AR4.290**). For the operational phase, potential effects arising from plant noise, site lighting, generator use, vehicle movements and foul water treatment can be controlled through conditions requiring operational noise limits (**AR 4.289**), a detailed lighting strategy (**AR 4.301**), and measures governing odour (**AR 4.384**) and waste management (**AR 4.337**).

81. Having regard to NPPF paragraphs 187 and 198, the Secretary of State is satisfied that, subject to the recommended conditions, the development will not expose neighbouring residents to unacceptable levels of noise, artificial light or pollution and is appropriate for its intended use. The Secretary of State has also given weight to Thanet Local Plan Policy QD03, which requires development to avoid unacceptable living conditions through noise, vibration, light pollution, or loss of natural light. For the reasons set out at **AR 4.382-384**, the Secretary of State concludes that, with the proposed mitigation secured by condition, the proposal complies with Policy QD03.

82. Accordingly, the Secretary of State concludes that the proposal accords with NPPF paragraphs 135(f), 187 and 198, and with Thanet Local Plan Policy QD03, and that residential amenity considerations do not weigh against the grant of permission.

### **Major Accident Risk**

83. The Secretary of State has also had regard to the assessment of potential hazards, which include fire, UXO, radiation, protests, and glint/glare from solar panels (**AR 4.385-4.409**). Fire risk is considered low due to compliance with fire safety regulations, regular drills, and secure fuel storage (**AR 4.389**). Potential impact of an accident from an UXO is high but the risk can be mitigated through previous clearance surveys and proposed conditions requiring further investigation and monitoring during excavation (**AR 4.399**). Radiation hotspots from historic uses have been remediated, with remaining

areas restricted by condition (**AR 4.399**). Protest-related risks are acknowledged but considered limited due to strong site security, fencing, CCTV, and liaison with Kent Police (**AR 4.396**). A glint and glare assessment will be required prior to installing solar panels to prevent hazards to aircraft at Manston Airport (**AR 4.400**).

84. For the reasons given at **AR 4.409**, the Secretary of State agrees that the proposed development is not expected to give rise to unacceptable impacts in respect of any major accidents that could affect human health or the environment. With the above measures secured by planning conditions, the Secretary of State considers the proposal acceptable under paragraph 96 of the NPPF. Further, the Secretary of State considers this matter carries limited weight against the proposed development.

### **Employment and Local Economy Impacts**

85. The Secretary of State has also had regard to the socio-economic impacts of the proposed development through construction and operation. For the reasons given at **AR 4.410-4.419**, the Secretary of State concludes that there would be significant socio-economic impacts to the local area through job creation during construction and operation, with up to 800 net additional jobs and boosts to the regional supply chain. There would be further economic impacts through a potential £480 million in discounted net additional GVA and approximately £1 million annually in business rates.
86. These economic and employment benefits align with national and local policies promoting economic growth and the Secretary of State gives the benefits of this proposed development significant weight.

### **Planning Balance and Overall Conclusions**

87. Weighing in favour of the proposed development is its urgent need, which carries very significant weight, and employment and local economy impacts, which carry significant weight.
88. Weighing against the proposal are the identified harms which include: the harm relates to highway impacts, particularly the additional traffic generated by the development and its effect on the capacity and operation of the Spitfire Way / Manston Road junction; harm identified in respect of biodiversity, arising from the loss of trees and habitats of local to county importance and potential effects on protected and notable species; the harm in relation to contamination and groundwater risk, foul drainage capacity and wastewater management; the localised effects on character and appearance, including visual impacts and perimeter fencing; harm in respect of residential amenity, arising from construction activity, noise, lighting, traffic and odour; health and wellbeing impacts on the existing community; the effects on non-designated heritage assets, and operational waste management. The Secretary of State is satisfied that these harms can be appropriately mitigated through the imposition of planning conditions and, when assessed individually and cumulatively, they do not outweigh the substantial public benefits of the proposal and would not justify refusal.

89. Notwithstanding the identified conflict with adopted development plan policies SP26 (Landscape Character Areas), SE03 (Land Affected by Contamination) and CC01 (Fluvial and tidal flooding), on the basis of all the information in this case the Secretary of State considers the proposed development does not conflict with the adopted development plan when read as a whole.

90. Having had regard to the AR, relevant national policy, and material considerations, the Secretary of State concludes that the proposed development should be granted, subject to conditions securing mitigation and detailed design controls.

### **Formal Decision**

91. Under Sections 293B–E of the TCPA 1990 and the 2025 Order, the Secretary of State for Housing, Communities and Local Government, the Rt Hon Steve Reed MP, has considered the application by the Home Office for:

- Retrospective planning permission for the ITPC; and
- Full planning permission for a temporary training facility, permanent Reception Centre and training facility, and associated works at Manston, Kent.

92. Planning permission is granted subject to the conditions set out in **Annex B** of this decision letter. These conditions secure mitigation measures, detailed design controls, and operational safeguards to ensure compliance with national policy and environmental standards.

### **Right to Challenge This Decision**

93. Any person aggrieved by this decision may challenge it by making an application to the High Court under Section 288 of the TCPA 1990. Any such application must be made within six weeks beginning with the day after the date of this decision. A challenge may only be brought on the ground that the decision is legally flawed; it is not an opportunity to dispute the planning merits. If the Court upholds the challenge, it may quash the decision, in which case the application would fall to be re-determined.

Yours sincerely



**Lewis Thomas**  
**Deputy Director - Planning Casework Unit**

*This decision was made by the Secretary of State, and signed on his behalf*

## **List of Annexes**

Annex A – Appraisal Report  
Annex B – Planning Conditions  
Annex C – Sensitive Information  
Annex D - Consultees