

# **Planning Appraisal Report**

## **Former RAF Manston**

Ministry of Housing, Communities and Local Government  
(MHCLG)

12 February 2026

# **Lichfields is the pre-eminent planning and development consultancy in the UK**

**We've been helping create great places  
for over 60 years.**

**[lichfields.uk](https://lichfields.uk)**

# Contents

<b>1.0</b>	<b>Introduction</b>	<b>1</b>
	Former RAF Manston, Ramsgate, Kent	1
	Procedural Matters	2
	Preliminary Matters	3
	Environmental Assessment	4
	EIA Screening	5
	Habitats Regulation Assessment	5
	Engagement	6
	Other Relevant Legislation	7
<b>2.0</b>	<b>The Proposal</b>	<b>9</b>
	Proposal Land and Surrounding Area	9
	Description of the Proposed Development	10
	Use of Land	12
	Operational Development	13
	Site Access	16
	Duration and Phasing	16
	Stakeholder Engagement	17
<b>3.0</b>	<b>Planning Policy</b>	<b>23</b>
	Development Plan	23
	Supplementary Planning Documents	24
	National Planning Policy Framework	24
<b>4.0</b>	<b>Planning Considerations</b>	<b>29</b>
	Appraisal of the Main Planning Considerations	30
	1) Need for the Development	30
	2) Principle of Development	33
	3) Adequacy and suitability of the Site	35
	4) Access & Transport	39
	5) Land Contamination and Ground Water	46

---

6) Heritage	50
7) Character and Appearance	55
8) Flood Risk	58
9) Biodiversity	63
10) Noise	71
11) Lighting	73
12) Air Quality	75
13) Climate Change	77
14) Material Assets and Waste	79
15) Health and Wellbeing of Existing Community	80
16) Residential Amenity	84
17) Major Accident Risk	87
18) Employment and Local Economy	91
<b>5.0 Conditions</b>	<b>93</b>
<b>6.0 Overall Conclusion - The Planning Balance</b>	<b>95</b>
Recommendation	97

---

# Appendices

Appendix 1 Draft Planning Conditions

Appendix 2 List of documents submitted by the Home Office and considered

Appendix 3 EIA Screening

Appendix 4 HRA

Appendix 5 Consultation Responses

Appendix 6 Former RAF Manston Planning History

## **1.0 Introduction**

### **Former RAF Manston, Ramsgate, Kent**

- 1.1 The purpose of this Planning Appraisal is to provide to the Secretary of State (SoS) advice on the merits of the proposed development, having regard to the relevant planning considerations including the main planning issues. This is in response to the request for planning permission made by the Secretary of State for the Home Department (SSH/D), “the Home Office” (HO) on 26 June 2025.
- 1.2 The proposal seeks retrospective planning permission for an Initial Triage and Processing Centre (ITPC) for detained persons and for its replacement with a permanent processing facility, the Manston Reception Centre (MRC), at former RAF Manston (“RAF Manston” or “the Site”).
- 1.3 The ITPC has been operating at RAF Manston since December 2021 and is intended to continue operating, up until the point when construction of the MRC is anticipated to be completed (Q4 2028). The ITPC and MRC would be capable of processing of up to a maximum of 1,600 detained persons at any time. The primary inflow of detained persons into the Site will be from new small boat arrivals via Western Jet Foil, comprising single adult males, single adult females and families.
- 1.4 Some detained persons may be held for a period of 96 hours, which may be extended in exceptional circumstances up to a maximum five additional days, to allow the Home Office to ascertain their circumstances and confirm their identity. Those detained at the Site for 96 hours would be accommodated in Residential Holding Rooms, located in refurbished barrack blocks and have access to increased medical provision, outdoor space and have higher staff to detained person ratios.
- 1.5 The proposal from the Home Office also includes training facilities for Border Force and Immigration Enforcement Teams related activities along with vehicle parking (not associated with detained persons), on the Site. The training facilities include proposals for both a temporary and permanent facility.
- 1.6 In addition, operational development within the Site includes engineering works associated with the provision of foul and surface water drainage, including provision of a 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, substations and associated landscaping.
- 1.7 The Home Office is seeking planning permission by means of an application to be determined by the Secretary of State for Urgent Crown Development (in respect of The Town and Country Planning Act (“TCPA”) 1990 (as amended), Section 293B). The provision for planning permission to be sought under the Urgent Crown Development route was recently introduced through the Levelling Up and Regeneration Act 2023, with the function of the procedure to speed up the determination process of planning applications where there is an urgent need for the Crown to undertake nationally important development. Further details on the procedural matters are discussed below.

- 1.8 Draft conditions are appended (at Appendix 1) and referred to in this report. The proposed conditions are reasonable and necessary to address and manage the effects of the proposed development, should you take the decision to grant planning permission for the development. They are also relevant to the proposed development and to planning, precise and enforceable.
- 1.9 Should planning permission be granted under the Urgent Crown Development route its purpose would be to enable the continuation of the ITPC and development of a purpose-built processing facility, the MRC. Additionally, it would allow for dedicated training facilities to be used by Home Office and Border Force personnel. This would help the Home Secretary in the processing of detained persons arriving illegally in the UK and is intended to ensure that operations have been appropriately considered to avoid potentially severe implications for both the welfare of detained persons and legal and financial risk to the Home Secretary, Home Office and the Government.
- 1.10 This appraisal considers the merits of the case<sup>1</sup> and has regard to the development plan and other material considerations. In making your decision as Secretary of State, you must also take into account of any representations received from a relevant consultee within the consultation period<sup>2</sup>. The responses received from consultees within the period notified are discussed in detail below.

## **Procedural Matters**

- 1.11 In accordance with the TCPA 1990, Section 293B, the Secretary of State for the Home Department (SSHD) is the 'appropriate authority' to submit this application directly to the Secretary of State for Housing, Communities and Local Government (SSHCLG), for determination.
- 1.12 The SSHCLG may only agree to determine this application via the Urgent Crown Development route if they consider that (i) the development to which the application relates is of national importance and, (ii) it is necessary that the development is carried out as a matter of urgency.
- 1.13 This application is supported by a statement from the SSHD explaining why they consider this proposal is of national importance and required to be carried out as a matter of urgency. The SSHCLG is satisfied that the proposal meets these criteria (TCPA 1990, Section 293B, paragraph 1b) and that the application can be determined via the Urgent Crown Development route. As sensitive information, this statement is redacted.
- 1.14 This Planning Appraisal has been jointly prepared by planning professionals at Lichfields and MHCLG officials from the Crown Casework unit, and the conclusion represents the planning judgement of Lichfields. All members of the team are chartered town planners and members of the Royal Town Planning Institute and governed by the RTPI Code of Professional Conduct.
- 1.15 Lichfields carried out two site visits between January 2025 and April 2025 to the former RAF Manston site and the surrounding area, in conjunction with MHCLG officials from the Planning Response Unit. Site visits comprised of internal and external inspections of the

---

<sup>1</sup> Planning Practice Guidance (Crown Development and Urgent Crown Development). Paragraph: 063 Reference ID: 44-063-20250521

<sup>2</sup> The Town and Country Planning (Crown Development) (Urgent Applications) (Procedure) (England) Order 2025 (S.13 (4)).

site, in addition to visiting relevant areas surrounding the site to ascertain the relationship between the site and neighbours. An evening visit was conducted (April 2025) after dusk to ensure that nighttime effects of the proposed development could be noted. This Planning Appraisal has been informed by these site visits to the proposal site. Lichfields, with MHCLG officials from the Planning Response Unit, also examined the potential bus route of detained persons from Dover to the site. In addition, site visits were previously carried out by Lichfields to other Home Office facilities which accommodate asylum seekers and detained persons, notably Wethersfield in Essex, which have assisted in making planning judgements.

- 1.16 MHCLG wrote to the Home Office seeking clarification on a range of matters related to the planning proposal, and supporting material, submitted to MHCLG on 26 June 2025. MHCLG and the Home Office subsequently met on the 21 August 2025, to discuss these matters. The Home Office then submitted material on the 22 September 2025 in response to these requests for clarifications, and in some cases the responses resulted in the withdrawal and resubmission of revised material; the last of which was received by MHCLG on 9 December 2025. The planning proposal, and our consideration of it, has been informed by the relevant reports, accompanying drawings (as set out in Appendix 2) and information within the Clarification Table (dated 15 October 2025) submitted on behalf of the Home Office. We have considered these assessments and information as part of this Planning Appraisal.
- 1.17 During the course of our review, it became apparent there were a number of errors, ambiguities and contradictions within and between documents, not all of which were subsequently corrected by updated assessments supplied by the Home Office. The document list at Appendix 2 identifies the relevant material, which forms the basis of this Planning Appraisal, and the dates it was submitted. We have sought to address these matters by reference to a review of publicly available data sources and evidence exercising our own professional judgement. Where some relevant matters remained unresolved and taking into account the guidance on conditions in the PPG, we have identified potential conditions for inclusion within the Urgent Crown Development decision. Our analysis on individual considerations addresses these issues where relevant.
- 1.18 To clarify what has been approved for development, draft Condition 5 (at Appendix 1) lists the relevant plans and documents submitted by the Home Office that are approved.

## **Preliminary Matters**

- 1.19 This Planning Appraisal has due regard to the effect of the proposed development on persons with protected characteristics and the analysis undertaken by Lichfields to fulfil the requirements of the Public Sector Equality Duty (PSED), as set out in section 149 of the Equality Act 2010. This report has had due regard to the human rights aspects of the case, in line with the Human Rights Act 1998.
- 1.20 Amongst the information submitted by the Home Office (Appendix 2) is an Outline Construction and Environmental Management Plan (OCEMP) and an Outline Construction Traffic Management Plan (OCTMP). These documents have helped inform our consideration of the proposals. However, there are further matters arising from our assessments which are considered necessary for inclusion in a future CEMP and CTMP, to be secured by conditions.



- 1.21 Additional information that is in the public domain was considered where relevant. This includes that listed in the EIA screening matrix (Appendix 2.6, 'EIA Screening Request') and includes planning policy documents and a range of environmental information. Additionally, we have had regard to the (ongoing) Independent Inquiry into the Manston short-term holding facility which opened on the 17 March 2025, recognising that this Inquiry has not yet reported or concluded<sup>3</sup>.
- 1.22 Terminology: the Home Office uses the terms 'asylum seekers' and 'service users' to refer to persons who will be processed at the former RAF Manston development site. This report uses the term 'detained persons'.

## **Environmental Assessment**

- 1.23 This report takes into account the Environmental Impact Assessment (EIA) Screening Assessment carried out under the Town and Country Planning (Environmental Impact Assessment Regulations 2017 (as amended) ('the EIA Regulations') of the proposed project (at Appendix 3).
- 1.24 The role of the EIA Regulations is to ensure that likely significant environmental effects of a development are identified, assessed and taken into account by the relevant decision maker.
- 1.25 Schedule 1 and Schedule 2 of the EIA Regulations list types of development that are subject to EIA, but they differ in their requirement for an EIA. Schedule 1 projects are those listed as always requiring an EIA, such as crude oil refineries and construction of nuclear power stations is always EIA development. The proposed development is not Schedule 1 development as defined by the EIA Regulations.
- 1.26 The proposed development is considered to be an infrastructure project within category 10(a) 'urban development project' in column 1 in the table at Schedule 2 of the EIA Regulation. The site does not lie within or near a sensitive area as defined by Regulation 2 of the EIA Regulations but the site area exceeds 5 hectares, and therefore, the proposed development is Schedule 2 development. Schedule 2 projects are subject to an EIA only if they are likely to have significant effects on the environment by virtue of factors such as its nature, size or location.
- 1.27 EIA Regulation 5(3) of the EIA Regulations states that "A direction of the Secretary of State shall determine for the purpose of these Regulations whether development is or is not EIA development." Regulation 5(6) of the EIA Regulations allows the SSHCLG to make a screening direction of his own volition. A screening decision may take into account measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment. Such measures should be clearly described and capable of being secured.
- 1.28 For EIA, an Environmental Statement (ES) (and associated consultation on it) is required unless the project is considered unlikely to have significant environmental effects. This report takes into account the EIA screening assessment for the proposed development, which has been undertaken by MHCLG officials.

---

<sup>3</sup> The Manston Inquiry: <https://www.manston.independent-inquiry.uk/>

- 1.29 The EIA Screening assessment (Appendix 3) concludes that the proposed development would not result in likely significant effects and is therefore not considered to be EIA development.

## **EIA Screening**

- 1.30 The SSHCLG has considered whether the proposed development at the former RAF Manston, is likely to have significant environmental effects.
- 1.31 On the 26<sup>th</sup> June 2025 the Home Office made a request to the Secretary of State for a screening direction under the EIA Regulations. The information necessary to inform the SSHCLG screening direction in relation to the planning proposal is provided in the EIA analysis at Appendix 2.
- 1.32 The analysis considers the project as a whole, based on observations made on visits to the site by MHCLG and consideration of the description of the project provided by the Home Office. The analysis has considered the Project on the basis of it being completed by Q4 2028, comprising ITPC operation, construction, MRC and training facility operational phases.
- 1.33 Having reviewed the information and EIA screening assessment (Appendix 3), we agree with the analysis provided and that the proposed development is not EIA development.

## **Habitats Regulation Assessment**

- 1.34 Regulation 63 of The Conservation of Habitats and Species Regulations 2017 (“the Habitats Regulations”) states that the competent authority, in this case the SSHCLG:
- “before deciding to undertake, or give any consent, permission or other authorisation for, a plan or project which:*
- (a) 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*
- (b) 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.”*
- 1.35 Under Regulation 63(5) of the Habitats Regulations where likely significant effects are identified, the competent authority may agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site or the European offshore marine site (as relevant). It should be noted that these sites formerly known as Natura 2000 sites are now part of the National Sites Network since the UK withdrawal from the EU. When determining if likely significant effects or adverse effects on the integrity of a European site would arise, conclusions must adhere with the precautionary principle. Effects can only be excluded where there is objective evidence that they would not arise as the result of a plan or project either alone or in combination with other projects.
- 1.36 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. However, approval may only be given where it can be demonstrated that there are no adverse effects on the integrity of a European site protected under the Habitats Regulations.

- 1.37 The overall 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).
- 1.38 An initial Stage 1 HRA Screening Assessment (Stage 1) has been prepared to consider if the proposed development is likely to have a Likely Significant Effect (LSE) on any European sites, either alone or in conjunction with other projects and plans: the assessment is at Appendix 4.
- 1.39 In line with the Habitats Regulations, the proposed development has been assessed in terms of the likelihood of it having significant effects on any European sites, either alone or in combination with other projects and plans. For the reasons set out in the Stage 1 HRA Screening Assessment (Appendix 4), it is concluded that there would not be likely significant effects from the proposed development on any European sites, either alone or in combination with other projects and plans. Thus, a Stage 2 Appropriate Assessment of the proposed development is not required.
- 1.40 In conclusion, the SSHCLG can be satisfied that the evidence is sufficient to comply with the requirements of the Habitat Regulations.

## Engagement

- 1.41 In determining this application for Urgent Crown Development the SSHCLG is under a statutory duty to consult the Local Planning Authority (i.e. Thanet District Council) to which the application could otherwise have been made. The SSHCLG is also required to consult the relevant statutory consultees who they consider would be affected by the proposal, taking into account any representation received from a consultee within the period notified<sup>4</sup>.
- 1.42 Consultation on this application commenced on the 27 October 2025 and concluded on 11 November 2025, with the following consulted by MHCLG:
- Thanet District Council (TDC);
  - The Environment Agency (EA);
  - Health and Safety Executive;
  - The Coal Authority;
  - National Highways;
  - Kent County Council (as the Local Highways Authority) (KCC);
  - Ministry of Defence; and
  - Natural England.

---

<sup>4</sup> The Town and Country Planning (Crown Development) (Urgent Applications) (Procedure) (England) Order 2025, Part 2, Section 13 (1) and (4).

- 1.43 The responses received from the consultees are provided in Appendix 5 and discussed in further detail in Section 2.

## Other Relevant Legislation

- 1.44 The HO explains within the Planning Proposal Statement (PPS) submitted (para. 2.13) that the ITPC and future MRC are and will be governed by the Short Term Holding Facility (STHF) Rules 2018, as amended by the Short Term Holding Facility (Amendment) Rules 2022, and the Detention Services Orders. The Rules set out how particular aspects of the day-to-day operations of the ITPC and MRC are to be appropriately managed and provide a statutory basis for control.
- 1.45 The ITPC and future MRC comprise of holding rooms and residential holding rooms, that collectively form a STHF and to which the Short Term Holding Facility Rules (as amended) will apply. A 'holding room' is defined by the legislation as being *"a short-term holding facility where a detained person may be detained for a period of not more than 24 hours unless a longer period is authorised by the Secretary of State"*. As introduced under the STHF (Amendment) Rules 2022, a 'residential holding room' is defined as *"a short-term holding facility where a detained person may be detained for a period of not more than 96 hours unless a longer period is authorised by the Secretary of State"*.
- 1.46 The PPS confirms that the ITPC and MRC will be governed by the Short-Term Holding Rules 2018 (amended in 2022) and the Detention Services Orders. The Rules set out how particular aspects of the day-to-day operations of the ITPC and MRC are to be appropriately managed for the detention of individuals under immigration powers, providing a statutory basis for control. A summary of the Rules is set out at Appendix 4 of the PPS and covers admission and discharge procedures, detention conditions, rights and welfare of detainees, staff responsibilities and security and safety protocols. As explained in the PPS, the Detention Service Orders provide mandatory instruction and operational guidance for Home Office Staff and contracted service providers working in holding and residential holding rooms. These Orders set out the processes to ensure compliance with the requirements of the Short-Term Holding Facility Rules.
- 1.47 The HO submission sets out that in exceptional circumstances, the time periods for detention can be extended beyond 96 hours (but up to a maximum of five additional days) if the extension is authorised by the Secretary of State. Neither the STHF Rules nor guidance define what constitutes an 'exceptional circumstance'. However, the HO explain that this is likely to include, but not limited to, the timing of a detained persons 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 and escort delays (in the case of those detained persons awaiting transfer to an immigration removal centre). The HO confirm that this extension should be for the minimum period required and ensure that the decision is fully recorded. In the context of the ITPC, the HO explains there are 14 marquees on the Site which comprise the holding rooms and 6 existing barrack blocks that accommodate the residential holding rooms. The marquees are able to accommodate 150 persons per marquee, with marquees separating intakes by single adult males and families and residential holding rooms able to accommodate 48 individuals per block. For the avoidance of doubt, the HO has confirmed that no more than 1,600 detained persons will be on site at any one time, and this maximum is to be secured by planning condition.

- 1.48      Given the detained persons at the ITPC and MRC facilities will be governed by a dedicated legislative regime (STHF Rules and Detention Services Orders), these operational matters are not considered further within this assessment.

## 2.0 The Proposal

### Proposal Land and Surrounding Area

- 2.1 The Site was previously occupied by the RAF and used latterly by the Fire Service Training Establishment for the Ministry of Defence and an Army Reserve Unit and Air Cadet Squadron. The planning history of the Site, as shown on Thanet District Council's online register, is provided in Appendix 6. All entries relate to minor development. Since December 2021, the Home Office has occupied and used the Site as an Initial Processing and Triage Centre for detained persons. The Site is occupied by circa 89 buildings and structures in various use by the Home Office including Small Boats Operational Command centre, medical centre, interview suite, security base, training facility, Short-Term Holding Unit and Residential Holding Rooms. The Site includes existing car parking areas, hardstanding, estate roads, a large area of grassland to the east, with scattered trees throughout. The former Commandant's House is positioned in the south-west corner of the Site, fronting Manston Road (B2050) and set within mature gardens.
- 2.2 The Site is located within the Thanet Villages Ward of Thanet District, within the jurisdiction of Kent County Council, approximately 5.0km northwest of Ramsgate and 5.6km south-west of Margate. The project area of the Site measures 37.6 hectares (ha).
- 2.3 The development Site has seven access points via Manston Road (B2050): the main entrance, two secondary accesses (to the east of the main entrance), a dedicated access to the communications tower, an access at the south-west corner of the Site, dedicated access to the former Commandant's House and an (emergency) access located to the north-west corner of the Site (adjacent the ITPC). A pedestrian access point fronts the Site (across from the Spitfire Café car park), however this is secured by fencing.
- 2.4 The Site does not contain any statutory listed buildings, with the closest being Cheesman's Farm (Grade II Listed) approximately 1.0km to the north-west. The remains of a Monastic building, a Granary and Manston Court (all Grade II Listed) are approximately 1.1km to the south-east and a Scheduled Monument is approximately 1.5km to the north.
- 2.5 The Site is bound to the north by agricultural fields and farms and a pharmaceutical research company, Charles River Laboratories, to the east. Adjacent to the eastern boundary is a communications tower, fenced off from the wider Site, which is operational and owned by the Ministry of Defence (Figure 2.1).
- 2.6 A residential estate and some small businesses are situated approximately 15m to the west. The RAF Manston History Museum and Spitfire and Hurricane Memorial Museum are located to the immediate south, with the associated RAF Manston airfield circa 20m beyond and comprising taxi ways, runway, hangars and tarmac car parking.
- 2.7 Manston airfield is subject to The Manston Airport Development Consent Order 2022 which came into force on the 08 September 2022, and has been subject to a subsequent Non-Material Amendment decision (19 May 2025). This grants planning permission for the reopening and redevelopment of Manston Airport into a dedicated airfreight facility with the ability to handle at least 10,000 air cargo movements per year whilst also providing passenger, executive travel, general aviation and aircraft engineering services.

Figure 2.1. Former RAF Manston (with approximate extent edged in red).



Source: Google Earth (image date 14 April 2024).

## Description of the Proposed Development

- 2.8 The SSHD seeks retrospective planning permission for an Initial Triage and Processing Centre and full planning permission for a temporary training facility and modular buildings for processing, permanent Processing Centre and training facility and associated works at Manston.
- 2.9 The proposal also includes various infrastructure including a waste water treatment centre, temporary generators, additional lighting and CCTV, roof top solar panels, fencing (up to 6m in height), internal roads and parking areas.
- 2.10 The description of the proposed development, as stated in paragraph 2.6 of the PPS submitted by the Home Office is:

### ***“Retrospective Development\****

*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.*

*\*N.B retrospective development comprises all new development that has occurred at the site since the HO took occupation in December 2021, up to March 2025.*

### ***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 buildings 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.”*



- 2.11 We recommend that any Decision Letter adopts a 'hybrid' approach; granting planning permission for retrospective development, and permission for future development, subject to conditions requiring subsequent approval of detailed matters. This approach will establish a framework for development on the Site which can accommodate the Home Offices current and expected urgent future development needs, with flexibility for alteration should the operational requirements of the Home Office change.
- 2.12 The description of development for which planning permission is granted should cover the making of material changes in the use of buildings or any other part of the land and building, engineering or other operations.
- 2.13 The Decision Letter should also include the draft planning conditions to control key aspects of the development. The suggested conditions and reasons for them are covered later in this report, and details in full at Appendix 1. These draft conditions have been discussed with the Home Office, in particular where they introduce requirements to be addressed prior to the commencement of development.

## **Use of Land**

### **Retrospective**

#### **Short-Term Holding Facility: Initial Triage & Processing Centre (ITPC)**

- 2.14 The proposal seeks retrospective planning permission for the development of an Initial Triage and Processing Centre for the detention, screening and processing of a maximum of 1,600 detained persons comprising of single adult males, single adult females and families.
- 2.15 The ITPC consists of marquees to screen and temporarily accommodate all arrivals. This includes marquees for holding, processing, searching, providing welfare, amenity and dining facilities as well as vaccination services. Part of the former fire station is also utilised to assist with the processing of arrivals. Once processed, arrivals are taken on their onward journey from the Site to other accommodation, immigration detention, or their removal from the UK.
- 2.16 An additional modular unit has been erected comprising a two-storey block for office accommodation. The existing barrack and mess blocks have been reused and refurbished to provide interview facilities, healthcare facilities, office accommodation, storage and Residential Holding Rooms (for those detained up to a maximum of 96hours). A purpose-built Short-Term Holding Unit has also been erected for unmanageable and/or non-compliant detained persons for a maximum period of 24 hours.

### **Temporary**

- 2.17 Prior to construction of the Manston Reception Centre, the Home Office seeks planning permission to replace the marquees with temporary modular buildings. These will provide the Home Office with infrastructure whilst the new Manston Reception Centre comes forward. Once the permanent Reception Centre is operational, the Home Office confirms temporary modular units may be repurposed.
- 2.18 The proposed development also involves training facilities for Border Force and Immigration Enforcement Teams. This includes a temporary facility comprising of six

marquees containing a mix of classrooms and physical training rooms. Three aircraft fuselages and vehicle simulators are also proposed to assist Home Office staff training. The Home Office has confirmed that the fuselages will have a maximum height of 6.5m. The temporary training facility would have the capability to accommodate 100 trainers and trainees at any one time.

## **Permanent**

### **Short-Term Holding Facility: Manston Reception Centre (MRC)**

- 2.19 The proposal seeks to replace the ITPC with a new Short-Term Holding facility; the Manston Reception Centre. Like the ITPC, the MRC will detain, screen and process a maximum of 1,600 detained persons including single males, single adult females and families. The MRC will comprise modular buildings, extensions and refurbishment of existing buildings for the processing of detained persons including interview rooms, rooms for appropriate administrative and biometric checks, dispersal facilities and offices for operational command teams.

### **Training Facilities**

- 2.20 A permanent training facility will replace the temporary training facility and comprise a mix of classrooms, practical skills sessions in dojos (padded training rooms), introduce a classroom on an aircraft fuselage, provide a covered area to house the vehicle simulators and develop a 4m wide tarmac roadway to each aircraft fuselage access point from the training facility.
- 2.21 The training facility will also comprise of ancillary facilities to support its operation including offices, meeting rooms, multifaith prayer area, toilet, showers and changing facilities and stand down areas for delegates and instructors, respectively. The permanent training facility will accommodate a maximum of 144 staff, including those providing the training and those being trained.

### **Staff Accommodation**

- 2.22 This includes use of the former Commandant's house, located in the south-west corner of the site and fronting onto Manston Road (B2050), for on-site staff accommodation.

## **Operational Development**

### **Retrospective**

- 2.23 The Site area comprises 37.6ha (including the development zone), currently occupied by approximately 89 buildings and structures in various operational use by the Home Office including for Small Boats Operational Command centre, medical centre, interview suite, security base, training facility, Short-Term Holding Unit and Residential Holding Rooms.
- 2.24 The proposals would see the retention of the ITPC until the erection of the Manston Reception Centre (anticipated Q4 2028). The proposed facilities would be able to process up to 1,600 detained persons and the ITPC and MRC would not operate concurrently.

- 2.25 Some detained persons may be detained for up to 96 hours in Residential Holding Rooms whilst their identity and circumstances are ascertained. A Short Term Holding Unit (8 cell capacity) has been erected for holding unmanageable and/or non-compliant service users for a maximum period of 24 hours.
- 2.26 The ITPC comprises of the former fire station and various marquees ranging in size from 39 metres in length to 9 metres in width and from 4 metres in length to 2.5 metres in width. The maximum height of the marquees is 4 metres depending on the type/model. The largest marquee is the dining facility at 39 metres in length and 9 metres in width. The ITPC also comprises of mobile units to provide facilities including toilets, showers and vaccinations as well as shipping containers (37 no.) for storage purposes.
- 2.27 Temporary parking facilities to support the ITPC for 150 spaces (Vulcan car park) have also been created, which will be retained as part of the MRC.

### **Permanent**

- 2.28 The MRC will consist of new development including modular buildings, extensions and refurbishments of existing buildings. This will comprise;
- The 'Arrivals and Processing Centre Building' where detained persons will undergo appropriate administration and biometric checks. This building will include office space for the onsite operational command teams;
  - Holding rooms where detained persons will be held prior to their onward journey to other accommodation, immigration detention or their removal from the UK. There will be a maximum of four blocks comprising the 'Dispersal Facility', where detained persons will be taken for onward journeys offsite;
  - New buildings for ancillary administration facilities, communal services including indoor and outdoor recreation facilities, catering and dining facilities, toilet and washing facilities, laundry, pastoral care, healthcare and storage;
  - A gatehouse at the southern main entrance; and
  - Car parking provision for all onsite staff and operational vehicles comprising 800 car parking spaces (including 22 disabled spaces), 41 motorcycle parking spaces and 30 cycle parking spaces.

### **Demolition**

- 2.29 As part of the proposal, the Home Office is seeking permission to demolish some existing buildings across the site in the future, to be undertaken in phases. This includes buildings towards the south-west of the Site, a building at the north-western boundary and the fire training tower (see drg. No: 050836-9834-ATR-ZZZ-XX-DR-A-0251-S2-D0100).

### **Engineering Works**

- 2.30 The operational development required for the use of the Site includes 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, creation of internal roads and hard surfacing areas for parking of cars and operational vehicles, substations and associated

landscaping. Perimeter fencing of up to 6 metres in height is also sought, with internal fencing of up to 3.85 metres in height around the permanent training facility proposed.

### **Extent of Development**

2.31 The proposed operational development will be subject to and controlled by a combination of approved plans and conditions which together set maximum parameters (which may not be exceeded), as set out in the draft conditions (Appendix 1). These include:

- Maximum numbers of detained persons: 1,600
- Maximum building height: 12 metres
- Maximum fence height: 6 metres
- Maximum development area: 108,982 sq. m (retrospective development floorspace plus proposed development floorspace)
- Maximum floorspace: 100,991 sq. m (retrospective development floorspace plus proposed development floorspace, minus total demolition)
- Maximum development area of solar panels: 7,750 sq. m
- Car parking spaces: 800 (including 22 disabled spaces) (25% with EV charging point)
- Other vehicle parking spaces: 58 operational vehicle spaces (100% with EV charging points), 41 motorcycle spaces and 30 bicycle spaces.

### **Provision of Services**

2.32 The list of services to be provided by the Short-Term Holding facility to detained persons is set out below:

- Indoor recreation facilities (such as books, board games and TVs);
- Some outdoor recreation space;
- Catering and dining facilities;
- Laundry services;
- Pastoral care, including multi-faith facilities; and
- Healthcare (discussed below).

2.33 The provision of healthcare is managed by appropriately qualified teams under a healthcare supplier and is being offered as part of the ITPC and will continue to be offered as part of the MRC. On-site, this provision includes:

- Initial health screening upon arrival, including for infectious diseases;
- First aid (24/7 provision);
- Emergency treatment (including from emergency department consultants and paramedics) and treating acute medical needs (e.g. chemical burns, hypothermia) that could become life threatening;
- Provision of commonly prescribed medicines;
- Low-level trauma-informed mental health support service;

- Confidential health advice (including sexual health and substance misuse); and
- For those occupying the Residential Holding Room, a medical screening (completed by qualified nurses under Rule 30 and Rule 32).

2.34 The HO has designed the Site to be self-sufficient and all primary healthcare will be provided onsite. If the medical team deem it necessary, they may refer to local hospitals for further tests or treatment offsite, but only in certain or special circumstances. Emergency Doctors and Paramedics are available on the Site, providing detained persons with access to treatment, as required, 24/7.

## Site Access

2.35 Whilst the Site has seven access points from Manston Road, only four will be utilised as part of the proposal including the main entrance, the two secondary accesses (to the east of the main entrance) and the emergency access at the north-west corner (adjacent the ITPC).

## Duration and Phasing

2.36 Taken together, the Outline CEMP and Planning Proposal Statement suggest a duration and sequencing of development as follows:

- a *Retrospective Development (ITPC)*: this comprises of all development that has occurred since the HO took occupation of the site in December 2021 and up to March 2025.
- b *Demolition*: the CEMP confirms that demolition of existing buildings and structures on site is to be undertaken in phases. Phase 1 has already been undertaken and completed on the 11 December 2023 (as shown on the Demolition Plan - Phase 1 completed (Dec 2023), submitted for information). A Prior Approval Application for the Phase 1 demolition works had been submitted to TDC on 27 June 2023 and the Council confirmed that Prior Approval was not required for these works on the 26 July 2023 (Application Ref: DM/TH/23/0876). The Planning Proposal Statement submitted by the Home Office confirms that the subsequent phases of demolition are yet to be confirmed but are anticipated for late 2025.
- c *Temporary Development*: the existing marquees comprising the ITPC require urgent replacement and are proposed to be replaced imminently by temporary modular units. Similarly, as there are currently no training facilities on the Site, the proposal includes provision for a temporary training facility comprising of 6no. marquees, 3no. aircraft fuselages and vehicle simulators. The temporary training facility would be replaced by the long-term training facility and in the same location (anticipated on the 'sports ground' area).
- d *Construction Phase (for MRC)*: construction is expected to commence in Q2 2025 and completed by Q4 2028. The OCTMP also confirms that the operations of the ITPC will continue until the new facility [MRC] is completed.
- e *MRC & Permanent Training Facility Operational Phase*: is estimated from Q4 2028. For the purposes of this analysis, the on-site detained persons population is taken to be the maximum figure of 1,600 arrivals to be processed. Whilst the ITPC

and MRC are planned to be capable of processing 1,600 detained persons every 24-hrs, respectively, they will not operate concurrently.

- f *Decommissioning*: the Home Office also propose to provide decommissioning details of the temporary training facility at a future date and request for this to be secured by a suitably worded condition on the Decision Letter.

## Stakeholder Engagement

### Engagement in advance of the Proposal

- 2.37 The Home Office's approach to engagement is set out within the Manston Engagement Report (Engagement Report). Engagement on the proposal has been undertaken in advance of the submission in relation to the MRC, and it is the understanding of MHCLG that the Home Office did not undertake engagement prior to development of the ITPC.
- 2.38 Engagement on the MRC commenced in summer 2023, when the Manston Transformation Programme (MTP) officials initiated discussions with Sir Roger Gale MP regarding plans to upgrade the existing infrastructure at Manston. In autumn 2023, the Home Office also held meetings with TDC and KCC and joined the existing Multi-Agency Forum (MAF), who meet every six weeks, to share the proposals with wider public sector partners including [but not limited to] Police, Fire Services and the NHS. The Home Office went on to meet with District and Parish Councillors and have sought public feedback through online consultation.
- 2.39 The proposals for the MRC have been presented through channels including briefings, publishing of a bespoke brochure, a dedicated 'citizen space' webpage, with feedback obtained through a virtual survey.
- 2.40 The Home Office has met with KCC and River Oak Strategic Partners Ltd (owners of Manston Airport) regarding highway improvements at the Spitfire Way/B2050 Manston Road Junction and have conferred with KCC on the scope and findings of the Transport Assessment. The Home Office has also met with TDC and the Environment Agency regarding contamination matters.
- 2.41 The full programme and sequence of engagement for the MRC undertaken by the Home Office since 2023 (to February 2025) is as follows:
  - **Summer 2023:** discussion with Sir Roger Gale MP;
  - **Autumn 2023:** HO progressed with meetings with TDC and KCC and joined Multi-Agency Forums, sharing plans with wider public sector partners including South-East Strategic Migration Partnership, Local Authorities, NHS, UKHSA, Police and Fire Service;
  - **April 2024:** preparation and publication of the 'Manston' factsheet on the Gov.uk website;
  - **Summer/Autumn 2024:** engagement (mix of emails, letters and virtual meetings) with technical stakeholders including Natural England, Environment Agency, Southern Water (Lead Local Flood Authority), Crown Premises Fire Safety Inspectorate, KCC, TDC, TDC/KCC Heritage, Archaeology, Landscape, Lead Local Flood Authority and Highways, Historic England, National Highways and UKPN and IPSUM;

- **04 September 2024:** letters sent via email to Sir Roger Gale MP, Thanet District Councillors (Cabinet and Thanet Villages ward), Minister Parish Councillors, Manston Parish Councillors, KCC, TDC, Kent Police, Kent Fire & Rescue Service, Kent Resilience Forum, UKHSA, Kent and Medway Integrated Care Board, Maidstone & Tunbridge Wells NHS Trust, South-East Strategic Migration Partnership, Natural England, National Highways, Water Technology Engineering, Environment Agency, Southern Water and RAF museum. The HO also meets with the neighbouring RAF museum on a monthly basis;
- **04 September 2024:** ‘citizen space’ webpage went live.
- **10 September 2024:** letters were posted to properties within a 2km catchment area of the Site (1,776 properties).
- **10 September 2024 - 1 October 2024:** the online survey opened for responses, closing at 23:59pm on the 1 October 2024.
- **October 2024:** updating of the ‘Manston’ factsheet first published on the Gov.uk website in April 2024.
- **November 2024:** the HO hosted joint meetings with TDC and the Environment Agency to discuss questions on the draft submission documents shared. The HO hosted a separate meeting with KCC, following receipt of their engagement response and the HO sharing their draft surveys and assessments (Transport Assessment and Position Statement).
- **January 2025:** HO subsequently met with KCC to discuss highways/transport matters.
- **February 2025:** HO hosted a subsequent meeting with TDC and the Environment Agency to discuss further question on draft submission documents.

### Site Visits by the Home Office

- 2.42 Home Office led site visits have taken place with stakeholders, with the Engagement Report confirming that the Home Office hosted TDC officials, District Councillors and the EA at the site on the 15 March 2025 and Parish Councillors on the 07 May 2025.

### Online Engagement by the Home Office

- 2.43 The Home Office received a total of 263 responses to their online survey (September – October 2024). This included two responses from organisations (NHS Kent & Medway Integrated Care Board and the UK Health and Security Agency).

- 2.44 In addition to the online survey, eleven responses were received by the Home Office following contact by email. This included email responses from:

- 1 Natural England
- 2 Historic England
- 3 Environment Agency
- 4 Crown Premises Fire Safety Inspectorate
- 5 Dover Independent Monitoring Board

- 6 Kent County Council
- 7 NHS Kent and Medway Integrated Care Board
- 8 South East Strategic Migration Partnership
- 9 Thanet District Council
- 10 National Highways
- 11 UK Health and Security Agency

2.45 These responses are addressed in the main considerations sections later in this appraisal report.

### **Summary of Community and Initial Stakeholder Responses (10 September to 01 October 2024)**

- 2.46 The Home Office has received feedback expressing local opposition to the proposal. This is reflected in the responses to the online survey, which are set out at paragraphs 5.9-5.70 of the submitted Manston Engagement Report. In summary, the relevant planning concerns raised within these paragraphs includes:
- a *Land Use* - community disagreement that the Site should be used for immigration purposes, with concerns regarding the permanency of facilities and consideration if there is a reduction in the number of people arriving by small boats.
  - b *Alternative Land Use* - community suggestions that other alternative potential land uses should be considered, including meeting a shortfall in housing for local people.
  - c *Location* - some local perception that the location of the facility is not suitable.
  - d *Cumulative Impacts* - of the proposal with other developments nearby, including Manston Airport and new housing.
  - e *Economic Impacts* - recognition of the site's role as a local employer and the potential for job creation but some concerns from neighbours regarding the proposals impact of the tourist economy.
  - f *Adequate Facilities* - a small number of local comments noted the need for the facilities to be adequate, including for women and children, and approval of the proposals to stop using marquees.
  - g *Neighbour Amenity* - of the proposals impacts from light and noise sources on neighbouring residential receptors.
  - h *Infrastructure* - concerns from locals whether there is sufficient infrastructure to support the site, and other developments in the area, with particular reference to sufficient water supply and the impact on the sewage system/sewage being released into the sea.
- EA concerns related to Site contaminants and commented that protection of groundwater should be prioritised for any proposed development. The EA also confirmed they are unlikely to grant a permit for discharge of the wastewater



treatment centre to the environment and effluent to ground. Additionally, TDC raised concerns relating to potential risks to controlled waters.

- i *Local Highway Network* - community responses questioned whether the transport infrastructure can handle additional traffic and large vehicles. Several respondents noted the proposals interaction with the Manston Airport development plans, new housing and their combined impact on traffic. TDC raised concerns relating to impacts from vehicle trips and KCC acknowledged they expect to see an upfront improvement of the proposed Spitfire Way Junction roundabout prior to the full operation of the Reception Centre. National Highways raised no comments.

- j *Local Services* - community concerns regarding the proposals impact on public service provision, with comments that the Thanet area is already over capacity.

KCC recommended a focus on Infection Prevention and Control (IPC) and Outbreak Management Plans, with an emphasis on IPC for isolation facilities. In addition, Kent and Medway Integrated Care Board comment on the need for continuation of an enhanced level of medical provision as part of the proposal to mitigate impact on local NHS services.

- k *Environment* - TDC commented on the need to secure 10% Biodiversity Net Gain (BNG) and clarification how BNG will be managed and monitored.

2.47 These concerns are addressed in the main considerations sections later in this appraisal report.

## Engagement by MHCLG

2.48 As set out above, as per the statutory requirements, MHCLG have sought consultation responses from relevant statutory stakeholders which concluded on 11 November 2025.

2.49 The responses received by MHCLG are:

- 1 **Environment Agency** - confirm they have no objection to the proposal, subject to planning conditions relating to ground investigation, contamination and drainage being included on any permission granted.
- 2 **Health & Safety Executive (HSE)** - confirm the Site does not lie within the consultation distance of a major hazard site or major accident hazard pipeline.
- 3 **Highways (Kent County Council - KCC)** - confirm they agree with the methodology and principles of the Transport Assessment (TA), Travel Plan Framework and CTMP submitted and that the TA presents a 'worst case scenario' in terms of highway impact. KCC identify that the local traffic modelling undertaken at key junctions [within the TA submitted] reveals significant detrimental impacts at the Spitfire Way/Manston Road junction and the A299 Minster Roundabout. KCC state that as other development has recently enacted requisite capacity improvements at the A299 Minister roundabout, they consider this Site is best positioned to address its impact at the adjacent Spitfire Way/Manston Road junction for its mitigation. KCC comment they have had ongoing discussions with the Home Office and RiverOak Strategic Partners [as applicant for the Manston Airport DCO] regarding the proposed mitigation at Spitfire Way junction and they maintain that mitigation should be delivered upfront.

- 4 **Historic England** - have no substantive comments on the proposal and expect KCC to advise on implications of the proposal in respect of the undesignated archaeology and other undesignated heritage assets of the site.
- 5 **Lead Local Flood Authority (KCC)** - welcomes that the temporary and permanent development utilise on-site soakaways, where possible, which aligns with the drainage hierarchy set out in the National Standards for Sustainable Drainage Systems. KCC provide further recommendations regarding ground investigations, treatment of surface water and the approach to assessing future drainage designs.
- 6 **The Coal Authority** - confirm the Site does not fall within an area of past coal mine activity and no comments are made on this application.
- 7 **Natural England** - have no objection as they consider that the proposal will not have significant adverse impacts on statutory designated sites including Thanet Coast and Sandwich Bay Special Protection Area (SPA) and Ramsar Site, Sandwich Bay Special Area of Conservation (SAC), Thanet Coast SSSI & SPA, Margate and Long Sands SAC, Outer Thames Estuary SPA and Sandwich Bay to Hacklinge Marshes SSSI.
- 8 **National Highways** - confirm they have no objection to the principle of the development, nor the practicalities of it, recognising its distance from the Strategic Road Network, and the likely level, timing and distribution of traffic it would generate on the Strategic Road Network.
- 9 **Thanet District Council** - reiterate the Council's statement from October 2024 [within the Engagement Report submitted] that they recognise the importance of good quality reception facilities for people arriving in the UK from other countries but beyond this statement, do not provide comment on the need for a Reception Centre. The Council have considered the assessment of planning policies from the Thanet Local Plan, provided at Section 7 of the submitted Planning Proposal Statement and provide the following comments:
  - a *Environmental Matters* - the Council has confirmed the list of planning conditions within the position statement [Appendix 2 of the Planning Proposal Statement submitted] to address land investigation, unsuspected contamination, verification and surface water/foul drainage. Regarding air quality, the use of generators on site is inconsistent with the Council's objective to improve air quality and reduce emissions and recommend that the backup generators shall not be used for routine power provision and only operate in the event of a mains power failure. An updated Noise Impact Assessment is requested, given technical data for plant and mechanical ventilation systems were unavailable, with the objective that plant rating does not exceed background L90 at the façade of the nearest residential dwelling.
  - b *Highways* - the Council welcome the provision of proposed mitigation within the submitted TA, specifically a proportionate financial contribution and disposal of land to support the delivery of road infrastructure at Spitfire Junction.
  - c *Landscape and Visual Impact*— the use of parameter plans limits the Council's ability to meaningfully comment on the impact of potentially 4-storey high structures in different locations on the Site. Notwithstanding this, the existing

enclosed nature of the site and lack of a wider visual impact on the Landscape Character means that any impact is anticipated to be localised.

- 10 **Ministry of Defence** – confirm the proposal will not have an adverse impact upon [MoD] equipment and therefore have no objection from a statutory safeguarding perspective.

- 2.50 These representations are addressed in the main considerations sections later in this appraisal report.

### **Ongoing Engagement by the HO during Site Operation**

- 2.51 In addition to the HO continuation with the MAF for engagement, which would provide a basis for ongoing communication with stakeholders, the material submitted by the Home Office in support of the proposal includes further procedures to support engagement as part of the consultation and operation of the development that is set out in an Outline Construction Environment Management Plan.

### **Construction Environment Management Plan (CEMP)**

- 2.52 A CEMP is a document commonly used in construction and sets out a series of proposed measures that would be applied by the contractors to provide effective planning management and control during construction. These matters include, for example, the control of the hours when construction activity may take place, measures for controlling noise, dust and other emissions from the site, as well as waste.
- 2.53 As detailed within the Outline CEMP, during construction the Principal Contractor (responsible for the construction of the site) and the Home Office will provide contact details should members of the public wish to make contact. The Outline CEMP explains that communications with the community during the construction phase may take the form of ‘townhall’ face-to-face drop-in sessions, a dedicated website, local noticeboard or newsletter drops. The Outline CEMP also requires the Principal Contractor to provide a 24hr contact number in the event that there are complaints, emergencies or environmental nuisance out of working hours.
- 2.54 The Outline CEMP also refers to a requirement for the Principal Contractor to register with the Considerate Contractors Scheme. Additionally, the Outline CEMP requires the development and implementation of a stakeholder communications plan that includes community engagement before construction works commence on site.
- 2.55 Whilst the Home Office has submitted an Outline CEMP, setting out how proposed construction activity is managed, we recommend that these arrangements are secured by a condition attached to the permission requiring a detailed CEMP to be submitted and the matters that a CEMP should contain, for the SSHCLG approval prior to any further works of construction taking place.

## 3.0 **Planning Policy**

### **Development Plan**

- 3.1 Under Section 38(6) of the Planning and Compulsory Purchase Act 2004, decision makers are normally required to determine applications in accordance with the development plan, unless material considerations indicate otherwise. In this case, the development plan is a material consideration in the decision making.
- 3.2 The statutory development plan for the site comprises:
- Thanet District Council Local Plan, prepared by Thanet District Council and adopted on 9 July 2020.
  - Kent Minerals and Waste Local Plan 2024 to 2039 (2025), prepared by Kent County Council. and
  - Kent Mineral Sites Plan (2020), prepared by Kent County Council.
- 3.3 The site is not subject to an adopted neighbourhood plan.
- 3.4 The policies contained in the Local Plan which are relevant to the proposed development and which are discussed in more detail under the Main Considerations below, are:

#### **Thanet District Council Local Plan**

- Policy SP02 - Implementation
- Policy SP04 - Economic Growth
- Policy SP24 - Development in the Countryside
- Policy SP26 - Landscape Character Areas
- Policy SP27 - Green Infrastructure
- Policy SP30 - Biodiversity and Geodiversity Assets
- Policy SP35 - Quality Development
- Policy SP36 - Conservation and Enhancement of Thanet's Historic Environment
- Policy SP37 - Climate Change
- Policy SP41 - Community Infrastructure
- Policy SP43 - Safe and Sustainable Travel
- Policy SP44 - Accessible locations
- Policy SP45 - Transport Infrastructure
- Policy SP47 - Strategic Routes
- Policy HO22 - Residential Use of Empty Property
- Policy GIO5 - Protection of Playing Fields and Outdoor Sport Facilities
- Policy GIO6 - Landscaping and Green Infrastructure
- Policy HE01 - Archaeology

- Policy HEO3 - Heritage Assets
- Policy CCo2 - Surface Water Management
- Policy CCo4 - Renewable Energy
- Policy SE03 - Land affected by Contamination
- Policy SE04 - Groundwater Protection
- Policy SE05 - Air Quality
- Policy SE06 - Noise Pollution
- Policy SE08 - Light Pollution
- Policy TP01 - Transport Assessments and Travel Plans
- Policy TP03 - Cycling
- Policy TP04 - Public Transport
- Policy TP06 - Car Parking
- Policy TP10 - Traffic Management

3.5 The local plan does not include any policies directly relevant to the proposed development or site allocations in terms of the principle of the proposed use.

## **Supplementary Planning Documents**

3.6 TDC's Landscape Character Assessment Supplementary Planning Document (2020), KCC's Drainage and Planning Policy Statement, the Kent Spatial Risk Assessment for Water (2021) and Land Drainage Policy (2019) are relevant to the assessment of the proposed development.

## **National Planning Policy Framework**

3.7 The National Planning Policy Framework 2024 (the Framework) is also a material consideration and is referred to where appropriate in this report. Paragraphs relevant to analysis of the proposed development are:

3.8 Paragraph 7 states that the purpose of the planning system is to contribute to the achievement of sustainable development.

3.9 Paragraph 8 explains that achieving sustainable development means that the planning system has three overall objectives (economic, social and environmental), which are interdependent and need to be pursued in mutually supportive ways.

3.10 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.

3.11 Paragraph 48 requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. In this case, the development plan is one of a range of material considerations.

- 3.12 Paragraph 96 states that planning decision should aim to achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible and enable and support healthy lifestyles.
- 3.13 Paragraph 101 states that to ensure faster delivery of public service infrastructure Local Planning Authorities should work proactively and positively with statutory bodies to plan for required facilities and resolve key planning issues.
- 3.14 Paragraph 102 states that planning decisions should promote public safety and take into account wider security and defence required by: anticipating and addressing possible malicious threat and other hazards, especially in locations where large numbers of people are expected to congregate; and recognising and supporting development required for operational defence and security purposes.
- 3.15 Paragraph 109 states that transport issues should be considered from the earliest stages of development proposals, using a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places. This should involve: understanding and addressing the potential impacts of development on transport networks; and identifying and pursuing opportunities to promote walking, cycling and public transport use.
- 3.16 Paragraph 115 states that in assessing specific applications for development, it should be ensured that: sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location; safe and suitable access to the site can be achieved for all users; and, any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated.
- 3.17 Paragraph 116 confirms 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.
- 3.18 Paragraph 117 states that applications for development should give priority first to pedestrian and cycle movements and, so far as possible, facilitate access to high quality public transport. It goes on to require application for development to address the needs of people with disabilities and reduced mobility in relation to all modes of transport, create places that are safe and secure and minimise scope for conflict between pedestrians, cyclists and vehicles.
- 3.19 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.
- 3.20 Paragraph 124 states that planning decisions should promote an effective use of land in meeting the need for homes and other uses.
- 3.21 Paragraph 125 states that planning decisions should take opportunities to achieve net environmental gains and promote and support the development of underutilised land and buildings.

- 3.22 Paragraph 127 states that planning decisions need to reflect changes in the demand for land.
- 3.23 Paragraph 128 states that Local Planning Authorities should take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs.
- 3.24 Paragraph 129 states that planning decisions should support development that makes efficient use of land, taking into account the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it.
- 3.25 Paragraph 135 states that planning decisions should aim to ensure that developments will, inter alia, function well, be visually attractive, sympathetic to local character and history, optimise the potential of a site to accommodate development, support local facilities and transport networks, create places that are safe, inclusive and accessible and which promote health and well-being, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.
- 3.26 Paragraph 136 states that planning decisions should ensure that existing trees are retained wherever possible.
- 3.27 Paragraph 161 states that the planning system should support the transition to net zero by 2050.
- 3.28 Paragraph 167 states that Local Planning Authorities should also give significant weight to the need to support energy efficiency and low carbon heating improvements to existing buildings.
- 3.29 Paragraph 181 states that when determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere, and where appropriate, applications should be supported by a site-specific flood-risk assessment.
- 3.30 Paragraph 182 states that applications which could affect drainage on or around the site should incorporate sustainable drainage systems to control flow rates and reduce volumes of runoff, and which are proportionate to the nature and scale of the proposal.
- 3.31 Paragraph 187 states that planning decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, recognising the intrinsic character and beauty of the countryside, minimising impacts on and providing net gains for biodiversity, 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, and remediate degraded, derelict or contaminated land, where appropriate.
- 3.32 Paragraph 196 states that planning decisions should ensure that a site is suitable for its proposed use taking account of ground conditions and any risks from contamination, including risks from former activities.
- 3.33 Paragraph 197 states that where a site is affected by contamination, responsibility for securing a safe development rests with the developer and/or landowner.

- 3.34 Paragraph 198 states that planning decisions should 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 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; and limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.
- 3.35 Paragraph 199 states that planning decision should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. Paragraph 201 goes on to state that the focus of planning decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate control regimes).
- 3.36 Paragraph 207 states that where proposals affect heritage assets the applicant describe the significance of the heritage assets affected, including any contribution made by their setting.
- 3.37 Paragraph 210 of the Framework requires account to be taken of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation. It also notes the positive contribution that conserving heritage assets can make, and the desire for new development to make a positive contribution to local character and distinctiveness.
- 3.38 Paragraph 213 states that any harm to the significance of a designated heritage asset from development in its setting should require clear and convincing justification. Paragraph 215 goes on to state how less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal.
- 3.39 Paragraph 232 states that existing [Local Plan] policies should not be considered out-of-date simply because they were adopted or made prior to the publication of the Framework. Due weight should be given to them, according to their degree of consistency with the Framework.
- 3.40 It is recognised that a revised draft of the Framework is currently published for consultation but given its status the published Framework (December 2024) is the focus for this assessment.

### **Planning Practice Guidance**

- 3.41 The Planning Practice Guidance ('the PPG') is an online resource to support the application of the Framework. When assessing planning applications, the PPG should be read alongside relevant policies contained within the Framework.
- 3.42 Notably, on 30 January 2025, the Court of Appeal handed down its decision in *Mead Realisations Ltd v Secretary of State for Housing, Communities and Local Government*. The decision established that the policies of the NPPF and guidance contained in PPG have



equal status, both capable of being material considerations in the determination of planning applications.

## 4.0 **Planning Considerations**

4.1 This section of the report considers the main planning issues, including material considerations associated with the grant of permission. This takes into consideration the nature and location of the proposed development to which the grant of planning permission would apply.

4.2 In considering the submission, all material considerations must be taken into account. These include the adopted development plan and national planning policy..

4.3 The main planning considerations in this case are:

- 1 The need for the proposed development (including impact on national security);
- 2 The principle of development (including proper planning of the area and local economy);
- 3 Adequacy and suitability of the Site (including alternative sites);

### *Environmental*

- 4 Access and Transport;
- 5 Land Contamination and Ground Water;
- 6 Heritage;
- 7 Character and Appearance;
- 8 Flood Risk;
- 9 Biodiversity;
- 10 Noise;
- 11 Lighting;
- 12 Air Quality;
- 13 Climate Change;
- 14 Material Assets and waste;

### *Social*

- 15 Health and Wellbeing of Existing Community;
- 16 Residential Amenity;
- 17 Major Accident Risk;

### *Economic*

- 18 Employment and Local Economy.

## Appraisal of the Main Planning Considerations

### 1) Need for the Development

- 4.4 The need for the proposed development is a material consideration. In planning terms, it is relevant to consider whether the proposed development would appropriately meet an identified need and service for the triaging and processing of detained persons (for single adult males, single adult females and families) arriving irregularly into the UK.
- 4.5 Para. 124 of the Framework considers that planning decisions should promote an effective use of land in meeting the need for homes and other uses. Para. 127 confirms that planning decisions need to reflect changes in the demand for land.
- 4.6 There are no site allocations within the Local Plan that seek to meet the need for this proposal.

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

- 4.7 The SSHD has a statutory duty for immigration control and the processing of detained persons and asylum seekers. Irregular movements into the UK have historically focused on clandestine entry in lorries. However, Government initiatives to address entry via this transport mode has resulted in a displacement to other modes of entry, notably small-boat crossings via the Channel (particularly the short straits), rather than a reduction in the number of people seeking to enter the UK irregularly.
- 4.8 The situation of people crossing the Channel in small boats was first detected at a scale in 2018 (299). The number of people entering the UK in this manner has risen each year until 2022 (45,774), falling in 2023 (29,437), but increasing again in 2024 (36,816). In the first half of 2025, 19,982 people were recorded as having already arrived irregularly in to the UK in small boats<sup>5</sup>. The HO has recently confirmed (03 December 2025) that there have been approximately 39,292 small boat arrivals in 2025 to the UK (up to the end of November 2025). The Planning Proposal Statement (PPS) submitted recognises record levels of demands and considers that it is possible that irregular migration (of some description) will continue to occur, with predictions that global irregular movements may grow, due in part, to current global crises and instability.
- 4.9 This is recognised within the Government's National Security Strategy (NSS) 2025, with paragraph 7 noting that there are transnational challenges that the UK must contend, including population displacement, which will continue to place pressure on UK borders.
- 4.10 The PPS submitted confirms the ITPC was set up at speed in December 2021 to deal with unprecedented irregular arrivals that came to the UK during 2021/22. The ITPC has been operating without planning permission since its establishment. The infrastructure of this short-term holding facility largely comprises of marquees required for the detention, processing and holding of detained persons, with mobile units to provide toilet, shower and vaccination facilities. Temporary generators are relied upon to provide power to the marquees with temporary surface-mounted sewage tanks to service the toilets and showers.

---

<sup>5</sup> Home Office, [Irregular migration statistics quarterly](#): year ending June 2025 as Cited in House of Commons Library, [Asylum Statistics](#) 3 December 2025.

- 4.11 In October 2022 an overcrowding incident at the ITPC occurred whereby numbers of detained persons in excess of 1,600 were held at the Site for longer periods. A non-statutory inquiry to the decisions, actions and circumstances which led to the incident at the Site (between 1 June 2022 and 22 November 2022) commenced on the 17 March 2025. The Inquiry may make any recommendations it sees fit, including any actions that may, in its view, be appropriate because of its findings. The final report of the Inquiry will be published by the SSHD and the Government will respond publicly in due course.
- 4.12 The PPS submitted by the SSHD explains there is an urgent need to ensure that existing operations are regularised through the planning system and that the new Manston Reception Centre is delivered as quickly as possible. On this basis, a condition requiring the SSHD to implement the permission within two years following the date of this decision is recommended. The proposal also seeks for the replacement of the temporary marquees with temporary modular builds. The PPS explains that this would provide the Home Office with the essential infrastructure required at the Site whilst the permanent reception centre is under construction.
- 4.13 As set out in the PPS, the SSHD considers that the Manston Site is an important Government asset given it occupies a strategic location in close proximity to the short straits. The PPS recognises that with the continuation and any possible increase in irregular migration, the south-east remains the most likely entry point. The PPS explains it is vital the Home Office has the infrastructural capacity to bring those who arrive into the UK irregularly (by any route) into the immigration system rapidly. We consider the location of the Manston Site would support the SSHD in doing this, with short-term holding facilities acting as frontline infrastructure to UK borders.
- 4.14 Furthermore, the PPS sets out that infrastructure must respond to forthcoming policy and operational changes as a result of the creation of the Border Security Command (BSC). As explained in the PPS, the BSC will deliver cutting edge new technology, extra Officers and further covert capabilities across the system and work closely with the National Crime Agency, the police and other law enforcement agency partners to bolster the UK's border security and disrupt the criminal people smuggling gangs.

### ***Need for Training Facilities***

- 4.15 The proposal from the SSHD also includes provision for a temporary training facility, which in time will be replaced by a permanent training facility. The training facilities for Border Force and Immigration Enforcement Teams comprise of classrooms, physical training rooms, aircraft fuselages and vehicle simulators.
- 4.16 There are no training facilities of this type on the Site, and the PPS explains that such facilities are urgently required in order that the Home Office can meet its own training needs, notably for staff who escort detained persons. The temporary training facility would be able to accommodate up to 100 trainers/trainees per day, whilst the permanent training facility would accommodate up to 144.

### ***Conclusions on the need for the proposed development***

- 4.17 Evidence demonstrates the number of persons crossing the Channel via small boats since 2018 has increased and that irregular migration (of some description) is expected to continue, if not grow, as a result of global crises and instability. Therefore, it is our view that

there is an immediate and future need to process migrants who seek to enter into the UK by irregular means. We also consider the Manston Site is strategically located to do this, being close to the short straits, with the south-east remaining the most likely entry point for irregular movements.

- 4.18 Granting of planning permission would enable the continuation of the ITPC and development of a purpose-built facility, the MRC, so that the SSHD is able to undertake their statutory duty for immigration control, ensuring the identity and circumstances of asylum seekers arriving in the UK illegally (by any route) are ascertained. As proposed by the Home Office, a condition that limits the number of detained persons that may be accommodated on the Site at any one time is recommended. With the urgent requirement of the proposal, a condition is also attached requiring implementation of the permission within two years following the date of a decision.
- 4.19 The Site does not accommodate any training facilities and those proposed would provide the Home Office with the capabilities to meet the training requirements for its Border Force and Immigration and Enforcement teams.
- 4.20 It is therefore considered that there is an evidenced need for this infrastructure in this location for border security and to support the SSHD in their statutory duties.

### ***Impact on National Security***

- 4.21 The NPPF at paragraph 102 sets out that planning decisions should promote public safety and take into account wider security and defence requirements. This includes appropriate and proportionate steps that can be taken to reduce the vulnerability, increase resilience and ensure public safety and security. Under paragraph 102, planning decisions should also support development required for operational defence and security purposes and ensure that operational sites are not affected adversely by the impact of other development proposed in the area.
- 4.22 The Government's NSS 2025 sets out a 'Strategic Framework', with the first pillar to strengthen UK borders against all types of threat. The NSS explains that UK borders protect the nation from international threats and help us to uphold and enforce our domestic laws<sup>6</sup>. The NSS explains that illegal migration, enabled by criminal gangs, continues to cause strains on our public services as well as social fabric. It goes on to state that global terrorist groups pose a persistent and enduring threat, and the combined and overlapping threats from terrorists and extremists and organised criminals pose new and evolving risks to the UK.
- 4.23 The PPS echoes that irregular migration remains an enduring threat to matters of national and border security to the UK and it is vital the SSHD has the infrastructural capability to bring those who arrive in to the UK irregularly, by any route, into the immigration system rapidly. The ITPC and MRC will each be capable of processing 1,600 arrivals on site at any one time through biometrics collection, initial asylum screening interview, holding rooms and onward movement. The ITPC will continue to operate until the new MRC is constructed (anticipated 2028).

---

<sup>6</sup> Section (1) - Defend our territory, paragraph 7.

- 4.24 In some cases, detained persons will remain at the Site for 96-hours whilst their identity and circumstances are ascertained, residing in residential holding rooms comprising individual rooms with beds, a communal rest area and outside recreation space. In exceptional cases, a longer period may be authorised by the SSHD, up to a maximum of five additional days. The PPS submitted confirms that the ITPC and MRC will be governed by the Short-Term Holding Rules 2018 (amended in 2022) and the Detention Services Orders. The PPS explains that neither the Short-Term Holding Facility Rules nor guidance defines 'exceptional circumstances' in this context but this is likely to include, but not be limited to, the timing of their return flight, unexpected delays to their return flight, a very high number of arrivals in a short period, escort availability or escort delays.
- 4.25 The ITPC and MRC proposal seeks to ensure that mandatory security checks and the screening process of detained persons is undertaken so that the identity and circumstances of those entering the UK by irregular means can be ascertained.
- 4.26 Given the ITPC was set up at speed, the PPS explains that detained person flow around the Site and their engagement with the respective stages of processing (set out in further detail below) is not optimised due to limitations of the existing ITPC infrastructure and its layout. The PPS explains that this causes inefficiencies in both cost and time, meaning that there are barriers to overcome when processing a high number of arrivals. The proposed and upgraded infrastructure at the Site seeks to facilitate a more efficient processing system, reducing the time required to register asylum claims (or other casework requirements that may apply) and for the Home Office and Border Force to complete security checks.

### ***Conclusions on the Impact on National Security***

- 4.27 In conclusion, having taken into account the provisions of the Framework, it is considered 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.
- 4.28 The proposal would provide the necessary infrastructure to meet and support national security needs and therefore accords with Paragraph 102 of the Framework.

## **2) Principle of Development**

- 4.29 The principle of development is a material consideration. The site is a brownfield site located outside a settlement boundary and would comprise of development in the countryside, as designated in the development plan.
- 4.30 Relevant policies in the Framework relate to making effective use of land (Paragraph 124), development of underutilised land and buildings (Paragraph 125), alternative uses of land currently developed but not allocated for a specific purpose in plans where this would help to meet identified development needs (Paragraph 128) and efficient use of land for development and the availability of land suitable for accommodating it (Paragraph 129).
- 4.31 Local Plan Policy SP24 (Development in the Countryside) states that development on non-allocated sites in the countryside will be permitted for the redevelopment of a brownfield site for a use that is compatible with its countryside setting and its surroundings. Policy SP24 also requires that all development proposals in the countryside 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.

- 4.32 The Local Plan does not set out a list of uses or development that is compatible within the designated countryside or set out a land use preference for brownfield redevelopment sites.

### ***Established Use of the Site***

- 4.33 The PPS explains that the site was previously in use by the RAF, and the Fire Service Training Establishment for the Ministry of Defence, an Army Reserve Unit and Air Cadet Squadron from 2017 until 2021.
- 4.34 The PPS states that the Site has an extant lawful use falling within Class C2A (Secure Residential Institution). This use class provides for secure residential accommodation, including use as a prison, detention centre, secure training centre, custody centre, short term holding centre or military barracks. The PPS sets out that the Home Office had received legal advice (in December 2021), prior to the Home Office taking occupation of the site. Lichfields and MHCLG have not been privy to the Home Office's legal advice.
- 4.35 The planning history available on Thanet District Council's online record (Appendix 6), does not clearly establish the historic use of the Site in Class C2A. The PPS also sets out that the proposal seeks to *regularise* the existing use of the Site as an Initial Triage and Processing centre and seeks permission for this continued land use. The application proposal and the use is therefore assessed on its own merits.

### ***Brownfield Development***

- 4.36 The Site's brownfield characteristics extend from its long history associated with its former RAF use and comprises of historic barracks, institutional housing, welfare buildings, training facilities and extensive areas of hardstanding.
- 4.37 The proposal makes use of a former military base and utilises the Site's characteristics and infrastructure associated with the historic use. Both the proposal and former base have enhanced security requirements with a need to operate securely and away from the public. The Site already has controlled entry points and perimeter fencing, for example. The extent and availability of space across the Site also facilitates the provision of training infrastructure to meet operational needs and support essential ancillary services to ensure the Site is self-sufficient.
- 4.38 The Framework is clear that planning decisions should promote an effective use of land, give substantial weight to the value of using brownfield land for identified needs, and promote and support the development of under-utilised land and buildings.
- 4.39 The provision of facilities for the detention and processing of detained persons and training facilities for Home Office and Border Force officials at the Site is consistent with this policy.

### ***Development in the countryside***

- 4.40 The proposal comprises up to 100,991 sq. m of floorspace, with maximum building heights up to 12 metres, maximum fence heights up to 6 metres and an area of 7,750 sq. m of solar panels, in the countryside.

- 4.41 A development zone is proposed within the wider Site (see ‘Development Zone & Maximum Building Heights’ plan, drawing number: 050836-9834-ATR-ZZZ-XX-DR-A-0350-S4-Do100 Rev. P13). This identifies an area (principally the previously developed part of the Site) where development may take place. The remainder of the Site, beyond the development zone, is to remain undeveloped.
- 4.42 The extent of and the parameters of development will be secured by condition, including plans approved by the SSHCLG. A draft condition requiring the SSHD to confirm the phasing of the development, within the development zone, is also recommended (Appendix 1) and details of the de-construction and removal of the modular buildings (comprising the ITPC).
- 4.43 While development of the scale proposed may not normally be regarded as compatible with its countryside setting and its surroundings, in this case the location is appropriate for the proposed use. There is already significant built development on the Site and the proposed development will reuse or replace the existing buildings within a similar development zone. Further, the effects of development will be mitigated to some extent by existing mature landscaping. On balance, we therefore conclude this proposal, on a brownfield site, is compatible with its countryside setting. The scale and size of the proposal is considered further at Main Consideration 7 (Character and Appearance) below.

#### ***Response from Consultees***

- 4.44 No relevant comments from consultees have been received, albeit Thanet District Council reiterate their comments sent to the HO in October 2024, and state that *“We fully recognise the importance of good quality reception facilities for people arriving in the UK from other countries and believe that everyone should be treated with dignity, respect and with due regard for their personal health and safety. Other than this statement of principle, we do not intend to comment on the need for a Reception Centre.”*

#### ***Conclusion on the Principle of Development***

- 4.45 The proposed development, substantially on the brownfield element of the Site, for the purposes of processing detained persons is not considered to be contrary to Local Plan Policy SP24 (Development in the Countryside).
- 4.46 Draft conditions (Appendix 1) set development parameters to contain the maximum area and extent of development at the Site, including a condition identifying the approved drawings in which buildings and structures must comply. The SSHD is also required by condition to confirm the phasing in which development is to come forward and the reconstruction and removal of the modular buildings comprising the ITPC.

### **3) Adequacy and suitability of the Site**

- 4.47 The adequacy and suitability of the Site for accommodating a triage, processing and reception centre for detained persons and training facilities for Home Office and Border Force Enforcement is a material planning consideration.
- 4.48 The adequacy of accommodation within the RHRs is not considered as part of this planning assessment as the PPS submitted confirms it is governed by the Short-Term Holding Rules 2018 (as amended in 2022). This includes Rule 13 (Accommodation) that requires RHRs



for sleeping accommodation to be adequate for health in terms of its size, lighting, heating, ventilation and fittings.

- 4.49 As part of achieving sustainable development, paragraph 8 of the Framework seeks well-designed and safe places, which amongst other things, reflect current and future needs and support communities' health, social and cultural well-being. Paragraph 96 advises that planning decisions should aim to achieve healthy, inclusive, and safe places which, among other things, enable and support healthy lifestyles. Paragraph 198 requires development to be appropriate for its location, taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment.

### ***Alternative Sites***

- 4.50 A previous proposal for asylum seeker accommodation near Piddington, Bicester in 2003 was determined at appeal (ref. APP/C3105/V/02/1097456) by the Secretary of State. At para. 22, the Secretary of State agreed with the initial planning inspector's judgement "*...that it is not necessary for the Home Office to carry out an exercise comparing the site against alternative locations...[and] the Secretary of State agrees there is no national planning advice that would require the Home Office to adopt a specific sequential approach in selecting the site for the proposed accommodation centre.*" It is noted that this decision was upheld in the Courts (Cherwell District Council, R (on the application of) V First Secretary of State & ANOR [2005] EMCA Civ 543) and this approach has been applied here. Whilst this proposal is not for asylum seeker accommodation, this approach reflects the general principles in determining planning applications, which is that the application should be considered on its merits with alternative sites not generally being relevant.
- 4.51 In addition to there being no legal duty for the Home Office to identify alternative sites for the detention and processing of detained persons, there is no national planning policy requirement for this. Even if there were viable alternative sites, they may well be taken up by the Home Office to help meet the identified and pressing need, in addition to rather than instead of the proposed development Site.

### ***Adequacy of the Site***

- 4.52 Whilst the SSHD is under no requirement to put forward any such alternative site(s) to meet this infrastructure need, the PPS submitted identifies why the former RAF Manston site is suitable for the proposed use.
- 4.53 The PPS sets out the stages in which detained persons are processed through the Site (p.81-82). Lichfields undertook a Site visit on 28 January 2025, with Home Office and Border Force officials providing a guided walkthrough and associated verbal explanation of the stages of the short-term holding facility.
- 4.54 In summary, the stages of the processing are:
- 1 *Western Jet Foil (WJF)* - the Home Office undertakes an individual assessment of a detained person at WJF prior to being transferred to Manston. Property is removed from all arrivals and securely bagged when the detained person arrives at WJF. Unsuitable individuals (i.e. unaccompanied minors, those who have a contagious disease or health condition) will not be transferred to Manston.

*Short-Term Holding Facility (ITPC/MRC)*

- 2 *Waiting Area* - suitable detained persons are transferred from WJF to Manston via coach. This area comprises of seats and sofas, has emergency lighting and multi-lingual signage is displayed.
- 3 *Processing Area* - detained person fingerprints are scanned and an initial police/immigration search is run. Interpreters on site are able to assist, in addition to 'spider phones' for off-site interpreters.
- 4 *Care & Custody* - comprises of search areas and interview rooms. Immigration Officers (or contractors) conduct interviews and use Atlas to capture key data points. Where needed interpreters may dial in via telephone.
- 5 *Holding Area* - arrivals are separated into cohorts of Single Adult Males, Single Adult Females and Family Groups. The holding areas provide facilities including showers, toilets, prayer rooms, blankets, floor mats (for sleeping), some children's play equipment, hot and cold food and a small (contained) outside area.
- 6 *Onwards Dispersal* - following interviews with immigration officers, decisions for onward dispersal are made. Detained persons exit Manston via arranged transport (coach) that will take them to their next destination before being transferred onto dispersal accommodation.

Scanning arches are positioned on the thresholds of the entry and exit doors of the above areas (2-6), which scan the tags of detained persons to assist the Home Office in identifying capacity/blocks in the processing system. Before leaving the Site, wristbands are scanned for a final time before being removed from arrivals.

- 7 *Residential-Holding Rooms* - where additional time is required to ascertain an individuals identity and circumstance, that individual will be detained in a Residential Holding Room for a maximum period of 96 hours. The room comprises of a bed, storage and sink. There are communal toilets, shower, activities room and outside space (accessible only during the day).

- 4.55 Being in Government ownership, the Site was available to the Home Office in the urgent timescales required. The PPS explains the Site is of a sufficient size to accommodate the stages of processing (outlined above) and has suitable existing infrastructure to allow operations to be stood up quickly as a result of unprecedented demand. The size of the Site allows for the siting and delivery of essential ancillary services, notably the provision of healthcare on site, and the flexible siting of operations/buildings away from any sensitive receptors.
- 4.56 Importantly, being a former airbase, the Site has relevant security measures (including controlled entry points and perimeter fencing) already in place which is essential for both the ITPC and MRC operations.
- 4.57 The geographic location of the Site and its immediate connection to the strategic road network (Policy SP47 Strategic Routes) ensures the Site's connectivity to Dover (approximately 30-minute drive) where small boat arrivals occur, and which is an essential and fundamental reason as to why the Site has been chosen by the Home Office for this proposal.

### ***Training Facilities***

- 4.58 The proposal includes the provision of temporary and permanent training facilities. This includes aircraft fuselages, covered areas for vehicle simulators (within 10m of the fuselages), classrooms and dojos. The temporary facility comprises of six marquees with its proposed location on a former, but abandoned, playing field. The temporary training facility would be replaced by the permanent training facility in the same location. A condition is proposed to require the SSHD to submit a reinstatement plan prior to the deconstruction and removal of the temporary training facility.
- 4.59 The Site has a significant area of land which allows for the siting of training facilities away from the public and where detained persons are being processed. The visual and other effects, such as noise, should not arise, with suitable positioning of training facilities away from the area of the ITPC and MRC complex. The PPS sets out that although the new training facilities will be built on a former playing field, this area has not been in use for well over five years and as such the HO considered it unnecessary to consult Sport England<sup>7</sup>.
- 4.60 Aerial imagery confirms that this area of land proposed to accommodate the training facilities has not been used as a formal playing field since 2009, with the formal markings outlining a pitch (including halfway line, centre circle, penalty areas and touchlines) removed by that time. MHCLG has not therefore consulted Sport England.

### ***Staff Accommodation***

- 4.61 As part of the proposal, the Home Office seeks permission to convert the former Commandant's House (positioned in the south-west corner of the Site) into suitable accommodation for staff. No further detail beyond the proposed conversion is provided as part of the submission and the Home Office are seeking this decision to provide sufficient flexibility to allow the Commandant's House to be used as communal staff accommodation.
- 4.62 The principle of providing ancillary staff accommodation within a building that was previously in use as the Commandant's House is considered acceptable. To ensure that living conditions are acceptable in terms noise, an appropriately worded condition should be attached to the Decision Letter.

### ***Conclusions on the adequacy and suitability of the Site***

- 4.63 As set out above, whilst the Home Office does not need to consider alternative Sites for the proposal, the PPS submitted identifies why Manston is appropriate. We consider that the geographic location of the Site (in proximity to Dover/Short Straits) will support Home Office and Border Force operations and that elements of the existing security infrastructure at the Site can be re-used for this proposal. The size of the Site ensures training can be undertaken away from public and detained persons views and operations are able to be largely self-contained to support the Home Office in improving operational efficiencies, including providing training opportunities for enforcement teams.

---

<sup>7</sup> Schedule. 4z) of the Town and Country Planning (Development Management Procedure) (England) Order 2015 requires 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 playing field; 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..."

- 4.64 In conclusion, with the Site already in Government ownership, in a location of proximity to Dover/Small Straits and at a scale capable of accommodating Home Officer and Border Force needs, we consider it a suitable Site for the proposed development.

## ***Environmental Considerations***

### **4) Access & Transport**

- 4.65 Transport and highway impacts and highway safety are material considerations. In planning terms, it is relevant to consider the effect of the proposed development on these matters.
- 4.66 Thanet Local Plan Policy SP45 requires development proposals to assess the type and level of travel demand likely to be generated and, where appropriate, to make a proportionate contribution to the provision, extension or improvement of walking and cycling routes and facilities and to highway improvements.
- 4.67 Thanet Local Plan Policy SP47 specifically identifies that, if further development is permitted, including at Manston Airport, which has a material impact on the capacity or operation of the B2050 Manston Road (from Manston Court Road to Spitfire Junction) and B2190 Spitfire Way (from Spitfire Junction to Columbus Avenue junction), on-site highway provision (where appropriate) or a proportionate contribution towards any improvements or changes to these route will be required.
- 4.68 Paragraph 109 of the Framework advises that transport issues should be considered from the earliest stages of the development proposal. In assessing applications for development, Paragraph 115 sets out relevant matters for consideration which includes ensuring sustainable transport modes are prioritised, safe and suitable access can be achieved and any significant impacts from the development on the transport network or on highway safety can be cost effectively mitigated to an acceptable degree.
- 4.69 Paragraph 116 of the Framework confirms that development should only be prevented or refused on highways 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.
- 4.70 A Transportation Assessment (TA), Travel Plan (TP) and Outline Construction Traffic Management Plan (OCTMP) are submitted alongside the PPS, which provides relevant information.
- 4.71 Further, on 8 December 2025 the Home Office provided an update on its discussions with Kent County Council (the local highway authority) and RiverOak Strategic Partners Limited (the beneficiary of the Development Consent Order for the redevelopment of Manston Airport). This submission comprised a tripartite letter and associated plans setting out progress and an indicative programme relating to improvement works to the Spitfire Way/Manston Road junction. It also confirmed the Home Office's commitment to a financial contribution to KCC as local highway authority.
- 4.72 The principal access and egress route to the site is along Manston Road (B2050) and via the main entrance. A gatehouse is located at the main entrance, serving as the primary checkpoint, ensuring that only authorised vehicles and individuals can access the site. The

OCTMP set out that the site has three secondary access points which are anticipated to be utilised for short periods during the construction phase. As confirmed by the HO in their response to MHCLG clarification questions (dated 10 September 2025), the frequency of use of the secondary access by construction traffic is not known at this stage as a construction contractor has not been appointed. On this basis, a planning condition is proposed requiring the HO to provide further details on the identification and use of the secondary accesses within a detailed Construction Traffic Management Plan.

### ***Trip generation associated with the proposed development***

- 4.73 The proposal has three sources of traffic associated with its construction and operation. In terms of operational traffic, the PPS explains that the existing ITPC and proposed MRC will process a maximum of 1,600 detained persons at any one time. The ITPC and MRC would not operate concurrently. Detained persons will arrive and depart from the site by coach (■■■■■) and the TA estimates this will result in ■■■ buses arriving and another ■■■ departing during the ■■■■ and ■■■■ peak hours. The TA (page 34) indicates that ■■■ passenger car units (PCUs)<sup>8</sup> movements for entries and exits for detained person vehicles will occur in the peak hours.
- 4.74 In addition, trips will be generated by approximately ■■■■ staff servicing the site and ■■■ Border Force and Home Office officials will attend training at either the temporary or permanent training facilities each day, totalling ■■■■ personnel on site. The TA calculates the following PCUs during the AM and PM peak hours, with the majority of trips generated by cars:

Table 4.1 MRC Operations PCUs during peak hours.

Type of Vehicle	MRC Operations	
	Entries (PCUs)	Exits (PCUs)
AM Peak (07:45-08:45)	156 (137 by car)	62 (56 by car)
PM Peak (16:45-17:45)	24 (19 by car)	150 (122 by car)

Source: BackerHicks (TA, p.34).

- 4.75 The TA (Appendix P) notes that staff shift changeovers are likely to occur outside of conventional network peak hours. Administration staff and trainers/trainees attending the training facility (■■■ and ■■■ personnel, respectively) are however expected to enter or exit in the peak hours.
- 4.76 The OCTMP anticipated that construction of the MRC would commence in Q2 2025, with completion by Q4 2028. The TA expects that the initial clearing and grading stage represents the peak of construction activity with 201 vehicles arriving and leaving the Site. This will result in 19 PCU entry and exit movements during the AM and PM peak hours.

<sup>8</sup> PCU - the impact of a transport mode on traffic compared to a single car. For example, a car is 1.0 PCU and a coach is 2.0 PCU.

### ***Transport assessment by the Home Office***

- 4.77 In assessing the proposal, the TA applies two approaches to identify the impact of the proposal, considering the short-term implications of the MRC ('phased') and the long-term implications ('layered').
- 4.78 The 'phased' approach considers development at the site in phases and does not consider committed development and infrastructure being in place before 2028. Each phase addresses specific aspects of the development process, from construction to full operation, as follows:
- Initial Triage Processing Centre (ITPC) Temporary Operational phase;
  - Manston Reception Centre (MRC) Construction phase; and
  - MRC Operational phase.
- 4.79 The 'layered' approach considers committed developments and associated highway infrastructure in the locality, assuming these developments will progress in the planning system and be delivered ahead of MRC Development.
- 4.80 The Home Office has advised that, in undertaking the assessment, limited data is available in respect of historic traffic generation prior to the Home Office acquiring the Site in January 2022. As such, the TA has considered the existing ITPC operations and the proposed MRC development as all new traffic.
- 4.81 The TA also includes personal injury accident data relating to incidents outside the Manston site and the five main junctions covering a five-year period from 1 January 2019 to 31 December 2023<sup>9</sup>. A total of 28 accidents were recorded, of these 22 (78%) were classified as 'slight', 5 (18%) as 'serious' and 1 (4%) 'fatal'. The TA concludes that whilst parts of the local highway network are likely to experience an increase in traffic volumes as a result of the proposals, it is not anticipated that this would increase the potential of road safety incidents as there are no existing concentrations of accidents.
- 4.82 Chapter 10 of the TA provides an analysis of the potential impacts of the MRC development, incorporating traffic flows, committed developments, and infrastructure improvements, utilising both the 'phased' and 'layered' approach to understand the potential impacts of different scenarios on the local transport network. These scenarios are then applied to local traffic modelling, providing a detailed assessment of the scenarios on five key junctions identified in the study area, including:
- Manston Road/MRC Development Site Access
  - Manston Road/B2050/Spitfire Way
  - B2190/Spitfire Way/Columbus Avenue
  - B2190/Minster Road
  - A299/B2190/Hengist Way (Minster Roundabout).

---

<sup>9</sup> The TA covers a five-year period, and not a three-year period, due to the Covid-19 pandemic and associated reduced vehicle flows.

- 4.83 Whilst ten junctions are considered, the TA confirms these five junctions have been subject to further traffic modelling analysis on the basis of a traffic impact of >5% due to MRC operations.

**Junction 1: Manston Road/MRC Development Site Access**

- 4.84 On the basis of the ‘phased’ and ‘layered’ scenario testing, the TA finds that Junction 1 operates under capacity, with minimal queues and delays. The TA therefore concludes that the current Manston Site Access is acceptable in both capacity and operation terms, and no mitigation is required.
- 4.85 The TA identifies that a small number of vehicles (visitors and new staff) overshoot the junction due to a lack of signage at the entrance and in advance of the junction. The TA recommends consideration to improving the existing Site access signage. This is considered a reasonable and necessary response and a planning condition is proposed to secure its installation.

**Junction 2: Manston Road/B2050/Spitfire Way**

- 4.86 The TA has first assessed Junction 2 as existing and concludes that without development this junction is currently operating over capacity with ‘excessive’ queuing (up to 72 PCUs) during the PM peak (16:45-17:45).
- 4.87 For the ‘phased’ approach, the modelling of this junction identifies that the ITPC operations exacerbate the existing junction, with further queuing (up to 90 PCUs) during the PM peak. The addition of peak construction traffic to facilitate development of the MRC, the TA concludes that Junction 2 exceeds capacity with excessive queues and delays (up to 122 PCUs PM peak), and with potential impacts to adjacent junctions. The construction traffic associated with the MRC will therefore exacerbate the currently over-congested junction. With Junction 2 already over-capacity and further impacted by construction, operation of the MRC continues to exceed the junction’s capacity with excessive queues and delays.
- 4.88 On this basis, mitigation is required to address highway impacts to Junction 2 and planning conditions are proposed for the SSHD to submit a detailed staff Travel Plan within six months (following the date of this decision) and a Construction Traffic Management Plan prior to commencement of construction.
- 4.89 The requirement of the conditions includes promoting sustainable transport initiatives including staff car sharing, use of public transport and avoiding travel during the AM and PM peaks. The requirements of the CTMP also necessitate the SSHD to provide details of routing and arrangements to schedule and minimise construction vehicles during the AM and PM traffic peaks to mitigate impacts on Manston Road/B2050/Spitfire Way.
- 4.90 For the ‘layered’ approach, the modelling predicts that Junction 2 will fail and two potential upgrades to this junction are assessed; these being the Manston Airport DCO proposed signalised option, and a roundabout option at the Manston Road/ B2050 /Spitfire Way junction.
- 4.91 Modelling detailed at paragraph 12.4.2 of the TA concludes that, whilst the signalisation of this junction will support the MRC development in the short term, by 2043 the junction will experience overcapacity with excessive queues and delays. Conversely, the roundabout

option will support the proposed committed developments and MRC operations, remaining below capacity by 2043 with no operational issues.

- 4.92 As noted above, the HO has submitted a letter of agreement (dated 05 December 2025), detailing the principles of local highway improvements agreed between the relevant three parties; KCC (Highways), RiverOak Strategic Partners Ltd (owners of Manston Airport) (RSP) and the HO.
- 4.93 The letter confirms the HO is committed to transferring an area of crown land (the precise area is yet to be confirmed and agreed by the HO as part of detailed highways design work) within the southwestern corner of the Manston site bordering the B2050 and Manston Road, to provide the land required to facilitate construction of the roundabout. In addition, the HO is committed to providing a reasonable financial contribution towards the costs of delivery of the agreed roundabout, up to a maximum of £2,000,000. Delivery of these highway improvements would be undertaken by RiverOak Strategic Partners Ltd via the Manston Airport DCO. The letter is accompanied by preliminary design drawings and sets out the next steps for delivery of the roundabout. The letter is signed by all three parties providing confirmation of the agreement between the relevant stakeholders; KCC (Highways), RSP and the HO.
- 4.94 As the 'layered' assessment identifies the failure of Junction 2 by 2043, in the interests of mitigating adverse highway impacts, a *Grampian* planning condition is proposed requiring the construction and completion of the roundabout at the Manston Road/ B2050 /Spitfire Way junction prior to operation of the MRC. In our view, securing these highway improvements by such a condition would be a lawful approach. Further, the requirements for a CEMP and CTMP provide opportunities for construction related impacts on this junction to be appropriately mitigated prior to construction and completion of the roundabout. As such, the requirement for the roundabout to be constructed/completed prior to operation of the MRC is considered a reasonable trigger.

### **Junction 3: B2190/Spitfire Way Columbus Avenue**

- 4.95 For both the 'phased' and 'layered' scenarios, the TA concludes that no mitigation is required at this junction, as the current layout and capacity are sufficient to accommodate the projected traffic flows in all scenarios from the ITPC operations, MRC construction and MRC operational phase, as well as the committed developments.

### **Junction 4: B2190/Minster Road**

- 4.96 Again, for both the 'phased' and 'layered' scenarios, the TA concludes that no mitigation is proposed at this junction, as the current layout and capacity are sufficient to accommodate the projected traffic flows in all scenarios.

### **Junction 5: A299/B2190/Hengist Way (Minster Roundabout)**

- 4.97 The TA has first assessed Junction 5 as existing and concludes that without development this junction is currently operating over capacity on the Tothill Street approach, with 'high' queues (17 PCUs) and delays during the AM peak (07:45-08:45). Apart from Tothill Street, the TA finds this junction does not demonstrate any other major operational issues as queuing can be accommodated on the other three approaches during the AM and PM peaks (a maximum of 5 PCUs are identified during the PM peak and 4 PCUs during the AM peak).



- 4.98 For the ‘phased’ approach, the modelling of this junction identifies that the ITPC operations exacerbate the existing junction on the Tothill Street approach (only) due to the ITPC increasing the roundabout circulatory flow. The addition of peak construction traffic to facilitate the development of the MRC, the TA concludes that Junction 5 exceeds capacity with excessive queues and delays on the Tothill Street arm. With the Tothill Street approach already impacted, operation of the MRC continues to exceed the junction’s capacity with excessive queues and delays, although no significant impacts are identified on the other approaches.
- 4.99 For the ‘layered’ approach, the modelling predicts the junction will fail, with queues identified on Tothill Street during the AM peak (298 PCUs) and A299 (west), Tothill Street and Minster Road (north) during the PM peak (at 88, 123 and 71 PCUs, respectively). The TA therefore assesses two potential upgrades to this junction to mitigate the proposals impact; these being the Manston Airport DCO geometric changes and proposed revised geometric changes, both on the Tothill Street approach.
- 4.100 Modelling detailed at paragraph 12.7.2 of the TA concludes that the Manston Airport DCO geometric changes do not reduce the delay and queue lengths on Tothill Street. Conversely the proposed and revised geometric changes on Tothill Street (TA, Figure 12-4, p.71) mitigates the traffic generated by the MRC development.

### **Parking**

- 4.101 The proposals provide for a significant number of parking spaces which is identified in the TA as the primary factor affecting the volume of cars accessing the site. The Highways Update – Position Statement (TA, Appendix P) explains that through a combination of staggered start times and travel sharing, impacts to the highway within peak travel times can be avoided/reduced. A planning condition is nevertheless recommended to limit the maximum number of car parking spaces provided on site.
- 4.102 The TA (p.82) explains that for non-residential uses the published KCC Parking Standards require 10% active charging and 100% passive charging spaces. KCC has not raised any concerns in relation to the TA proposal for the MRC development to provide 25% of vehicle parking spaces with active charging facilities and 0% with passive charging on the basis of a capacity limitation in the network. The reduced charging provision is considered reasonable in the circumstances and given the location and nature of the use, so the proposed parking condition includes a requirement to provide 25% of vehicle parking spaces with electric vehicle charging points.
- 4.103 Chapter 13 of the TA details the Travel Plan Framework which has been developed for the Site and outlining potential initiatives that should be considered for a full travel plan. As set out above, a condition requiring the SSHD to submit a Travel Plan within six months following the date of this decision is proposed. The required Travel Plan is expected to secure a modal shift to sustainable modes and reduce single occupancy vehicle trips.
- 4.104 In addition, paragraph 14.3.1 of the TA sets out that parking management should be implemented as soon as practical and sets out considerations to inform a Car Park Management Plan. As the ITPC is operational now, a planning condition is proposed requiring the SSHD to submit a Car Park Management Plan within six months (following the date of the decision). This includes a requirement to provide details of the gatehouse

operations to control and manage the flow of vehicles and personnel entering and exiting the site to prevent further impact on the local highway network (as acknowledged at para. 14.2 of the TA).

### ***Response from Consultees***

- 4.105 National Highways has confirmed it has no objection to the proposals.
- 4.106 KCC (Highways) confirms its support for the principles and methodologies outlined in the TA, TPF and OCTMP and welcomes continued collaboration to ensure timely delivery of the necessary mitigation measures. Regarding Junction 2 (Manston Road/B2050/Spitfire Way) and Junction 5 (A299/B2190/Hengist Way - Minster Roundabout), KCC recognises the local traffic modelling carried out revealed significant detrimental impacts at the Spitfire Way/Manston Road junction and the A299 Minster Roundabout. KCC goes to suggest that as other development has recently enacted requisite capacity improvements at the A299 Minster Roundabout, it was considered that this Site would be best positioned to address its impact at the adjacent Spitfire Way/Manston Road junction for its mitigation. A shift away from private car usage and the HO's commitment to sustainable transport has also been noted and encouraged by KCC.

### ***Conclusion on Access & Transport***

- 4.107 The traffic impacts of the proposed development, including on the nearby Spitfire Way/Manston Road junction are recognised. However, it is concluded that the expected traffic and transport effects of the proposed development, across the temporary, construction and operation stages, can be addressed by appropriate mitigation, which can be secured by suitably worded planning conditions.
- 4.108 Planning conditions are recommended to cap existing car parking numbers and require a Travel Plan, Car Park Management Plan and Construction Traffic Management Plan. It is suggested the TP and CPMP are required to be submitted by the SSHD within six months following the date of the decision given the ITPC is operational now. It is also suggested the CTMP is submitted prior to commencement of the MRC, permanent or temporary training facilities to ensure construction traffic impacts are appropriately mitigated.
- 4.109 Regarding the improvements to local highway infrastructure, the position of Kent County Council as the local highway authority summarised above provides helpful guidance on the approach required. On the basis of its consultation response, no works are considered necessary to the A299 Minster Roundabout, but works to the nearby Spitfire Way/Manston Road junction are required to allow for MRC operations alongside committed development and avoid overcapacity with excessive queues and delays. A *Grampian* planning condition is therefore proposed requiring the construction and completion of this highway infrastructure prior to operation of the MRC. The requirement for the roundabout to be constructed and completed prior to construction of the MRC is not necessary, as it is considered traffic impacts associated with construction vehicles can be appropriately mitigated through a CTMP.
- 4.110 Overall, having considered the evidence and 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 we are satisfied that the proposal is acceptable in transport terms, complying with SP45 (Transport Infrastructure) and SP47 (Strategic

Routes) of Thanet Local Plan (2020) and relevant parts of Paragraphs 109 and 115 to 118 of the Framework.

## 5) Land Contamination and Ground Water

- 4.111 The impact of existing land contamination on water and human health is a material consideration.
- 4.112 As part of achieving sustainable development, Paragraph 187 of the Framework requires development to contribute to and enhance the natural and local environment by 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. Paragraph 196(a) of the Framework also states that planning decisions should ensure that a site is suitable for its proposed use taking account of ground conditions and any risks arising from contamination.
- 4.113 Policy SE03 (Land Affected by Contamination) and Policy SE04 (Groundwater Protection) of the Thanet Local Plan generally accord with the Framework, requiring appropriate site investigation where contamination is a possible risk, and only approving development where adequate mitigation measures can be implemented.
- 4.114 The application from the Home Office is accompanied by a Ground Investigation Report (“GIR”) (dated 21 March 2025) which uses data from both site investigations in 2023 and 2024 including groundwater monitoring and ground gas monitoring. In addition to this a Radiological Survey (dated November 2024), Outline Remediation Strategy (dated 16 June 2025), Unexploded Ordnance Risk Assessment (dated 12 January 2024) and Unexploded Ordnance Clearance Survey (dated 16 June 2025) were submitted with the application.

### ***Soil Assessment***

- 4.115 The GIR identifies risks associated with asbestos, lead and polycyclic aromatic hydrocarbons (PAHs) which pose a risk to the future site users, given their presence in the shallow on-site soils. Exceedances were reported in soil samples across both the 2023 and 2024 site investigations for PAHs, metals and TPH. Positive identification of asbestos-containing materials was also reported in the 2023 and 2024 site investigations.
- 4.116 The GIR outlines that concentrations of benzo(a)pyrene which were found to exceed the residential GAC in both the 2023 and 2024 site investigations were taken from Made Ground, and for both samples pieces of tarmacadam were reported to be present at the corresponding depths. It is possible that the concentration exceedance of PAHs is attributable to the tarmacadam material. A concentration exceedance for aromatic TPH >C21-C35 was also reported in this exploratory hole log, however no visual or olfactory evidence of contamination was reported at this depth in the log. It is therefore considered unlikely that these concentration exceedances will result in the generation of vapours that could accumulate at concentrations hazardous to the identified receptors. The report outlines that it is likely that given the proposed ground cover comprising of areas of soft landscaping any potential vapours that could be generated are likely to dissipate to atmosphere prior to accumulation.
- 4.117 Concentrations of lead were found to exceed the residential GAC in three samples taken from the 2024 site investigation from depths between 0.10 m bgl and 0.50 m bgl. These

lead concentrations were reported within the Made Ground and were widespread across the site (not in a cluster of locations). The UK Soil Observatory web viewer [37] indicates that lead concentrations in topsoil are modelled to be within the 80th percentile at the site, with a modelled concentration indicated to be 65.26 mg/kg, which is below the GAC. The report outlines it is therefore considered likely that the concentrations of lead are attributable to the on-site land use.

- 4.118 Asbestos has been positively identified in five samples across the 2023 and 2024 site investigations, most samples with positive asbestos identification are located in the north-west of the site. Asbestos quantification testing of the suspected ACM samples from the 2023 site investigation indicated that asbestos was present at concentration of 15 %w/w in all samples (WS03, WS10, WS14) which were taken within 1.00 m of ground level (0.70 m bgl, 0.30 m bgl and 0.30 m bgl respectively). Quantification of the 2024 samples indicated that asbestos was present at concentrations of 1.164 %w/w in TPO4 (0.10 m bgl to 0.30 m bgl) and 0.273 %w/w in BHO4 (0.10 m bgl to 0.20 m bgl). Four of the positive identifications were at shallow depths of less than 0.60 m bgl, these are more likely to pose a risk from soil disturbance, however this is dependent on the site activities. Given the presence of asbestos, and the concentrations at which asbestos has been identified to be present at, any disturbance of the on-site soils, or the exposure of the on-site soils through the removal of vegetation could result in the generation of asbestos fibres in soil-derived dusts as the samples in which asbestos was positively identified are within 1.00 m of the ground level.
- 4.119 There is considered to be a risk from on-site soils to human health receptors due to the presence of asbestos and concentrations of lead in shallow soil samples. Risks to workers and other users of the site during earthworks can be mitigated through adherence to CDM 2025, industry good practice measures, and the adoption of the control measures in a Outline Construction Environmental Management Plan considering industry guidance and legislation. During the operational phase, risks can be mitigated through the placement of a clean cover capping layer which would break the pathway between the contaminants in the on-site soils and the future site users.

### ***Ground Gas***

- 4.120 A ground gas risk assessment using both the 2023 and 2024 site data has been undertaken for the site, demonstrating a characteristic situation for the site of CS1, indicative of a very low risk. This is assessed as expected by the GIR, given the absence of any significant thicknesses of Made Ground, and the low organic content of Made Ground at the site. The CS1 classification, along with the absence of any exceedances of the workplace exposure limits for both long-term and short-term exposure, indicates that there is not considered to be an unacceptable risk posed from ground gases to human health receptors on-site.
- 4.121 A ground gas risk assessment using both the 2023 and 2024 site data has been undertaken for the site which demonstrates the characteristic situation for the site is CS1, indicative of a very low risk. As previously stated, this is to be expected given the absence of any significant thicknesses of Made Ground, and the low organic content of the Made Ground at the site.
- 4.122 The CS1 classification, alongside the absence of any exceedances of the workplace exposure limits, for both long-term and short-term exposure, indicates that there is not considered to be an unacceptable risk posed from ground gases to human health receptors on-site.

4.123 Limited ground investigation has been undertaken in the eastern area of the site, including the fire training area. However, given the absence of any significant thicknesses of Made Ground across the site, the low organic content of the Made Ground encountered, low ground gas concentrations and gas screening values and the absence of exceedances of CO and H<sub>2</sub>S against the WELs recorded across the site, the risk to on-site and off-site human health and property receptors is considered to be low. Whilst there are not considered to be any significant ground gas sources in the areas to the north and east of the site where GI has not been undertaken, if ground gas sources are identified during future ground investigation, then consideration will be given regarding the need for further laboratory testing of soil and / or ground gas installation and monitoring.

4.124 A draft planning condition is proposed in Appendix 1 to address this matter.

***Unexploded Ordnance (UXO)***

4.125 The submitted UXO Clearance Survey was undertaken in several phases between August 2023 and November 2024. The findings of these surveys included 194 metallic anomalies identified that could not be discounted as UXO and 4 areas of increased magnetic response were identified which could mask the detection of UXO at greater depth. To mitigate for this, the submitted Unexploded Ordnance Risk Assessment recommends that a site-specific plan for the management of UXO risk be written for the site. This plan should be kept on site and be referred to in the event that a suspect item of UXO is encountered at any stage of the project.

4.126 A draft planning condition is proposed in Appendix 1 to address this matter.

***Radiation***

4.127 The submitted surveys undertaken in November/December 2022 and February 2024 identified 12 locations, predominantly in the eastern half of the Site, to contain elevated levels of surface gamma radiation count, likely caused by contamination with uranium and radium from historical aircraft breaking activities. Environmental dose rate surveys confirmed that radiation dose rates across the Site were generally consistent with normal background dose rates expected within the UK.

4.128 Radiological remediation has been carried out on an area of land at the former RAF Manston site. Only seven of the identified locations were remediated during this exercise. The remediation identified that the cause of the elevated radiation measurements was a combination of radium luminised artefacts, soil containing elevated levels of radioactivity and a large rock. All of the artefacts and the large rock were removed from the ground under controlled conditions and placed into suitable waste containers and transferred to a secure waste store pending transfer offsite to a permitted waste recipient for disposal. The contaminated soil was placed into two bulk bags and transferred to a secure compound. The total activity of radium-226 in the artefacts was 1.23 MBq. The total activity in the soil was 479 kBq with an average activity concentration over the two bags of 0.55 Bq/g. Once the waste material had been removed from the area, the ground was resurveyed and no elevated radiation measurements above the surrounding background were detected. The off-site transfer of the radioactive waste was completed by the Home Office on 3 March 2025.

4.129 A draft planning condition is proposed in Appendix 1 to address this matter.

### ***Groundwater***

- 4.130 During the 2024 site investigation and subsequent monitoring rounds, groundwater was not consistently identified in the newly installed boreholes except BH15 where a small volume of groundwater was present below a depth of at least 9.00 bgl during site investigation.
- 4.131 Concentration exceedances reported for PAHs, lead and nitrate and are not considered to pose a significant risk to the groundwater receptor given their marginal and isolated nature, and the absence of a significant source of these contaminants. Whilst the controlled water GQRA considered on-site soils unlikely to pose an unacceptable risk to the identified groundwater receptor, there are limitations to the results of the GI; namely the limited GI undertaken to the north-eastern and eastern area of the site, and the minimal measurable groundwater above maximum installation depth impacting on obtaining groundwater samples.
- 4.132 To mitigate against this lack of data, further GI must be undertaken to address coverage across the eastern area of the site, including the fire training area and any other fire training ancillary buildings including drainage infrastructure, tanks, pipework and concrete hardstanding. An analysis of PFAS should also be undertaken to characterise the risk posed to controlled waters from the fire training area to the north and east. There is a risk of leaching of contaminants from the unsaturated zone to groundwater in the underlying principle bedrock aquifer (Margate Chalk Member) and migration of contaminants through preferential pathways including drainage channels, service ducts, high permeability strata.
- 4.133 A draft planning condition is proposed in Appendix 1 to address this matter.

### ***Mitigation Measures***

- 4.134 Without mitigation measures in place, there is an unacceptable potential risk from the Site's geology and soils to human health receptors and controlled waters specifically:
- A risk to human health receptors from exposure to asbestos containing material in Made Ground soils in soft landscaped areas of the site;
  - A risk to human health receptors from inhalation, ingestion and direct contact with elevated concentrations of lead, PAH and PFAS in on-site soils;
  - A risk to human health receptors from radiological hotspots; and
  - A risk to groundwater receptors from PFAS associated with on-site sources (fire training area specifically building 080 (stormwater interceptor from fireground and associated infrastructure), building 379 (fireground training), building 380 (underground stormwater drainage tank) and building 944 (fire house – fire simulation training) as presented in Appendix A) in the absence of ground investigation information in this area of Site.
- 4.135 Paragraph 197 of the Framework states that where a site is affected by contamination, responsibility for securing a safe development rests with the developer and/or landowner. Paragraph 196(a) also establishes decisions should ensure that a site is suitable for its proposed use, taking account of any risks arising from contamination. It would therefore be reasonable to impose a planning condition securing appropriate mitigation. The triggers attached to the conditions relate to both existing and future development.

- 4.136 Additionally, Thanet Local Plan Policy SE03 (Land Affected by Contamination) refers to *development on land* known or suspected to be contaminated or likely to be adversely affected by such contamination. As the GIR identifies limited ground investigations within the eastern area of the site (including the fire training area and its associated fire training ancillary buildings and infrastructure), the necessity for planning conditions to require further remediation/mitigation is relevant only to the areas of limited investigation, rather than the applicant site as a whole.

***Response from Consultee***

- 4.137 The Environment Agency confirmed that they have no objection to the proposed development, subject to identified planning conditions being included in any planning permission granted. These suggested conditions have regard to the above documents submitted and have been amended following further discussion with the Environment Agency.
- 4.138 Suggested planning conditions are included within the schedule at Appendix 1 and require submission of a ground investigation and risk assessment report, remediation strategy, radiation remediation strategy, verification reporting, materials management plan and UXO risk management.

***Conclusion***

- 4.139 It is concluded that the identified risks in respect of contamination and ground water are to be addressed by the proposed planning conditions relating to investigation, remediation and management of contamination which are proposed to be attached to any decision. The recommended conditions have had regard to the submitted Outline Remediation Strategy and consultation response received from the Environment Agency, and on this basis we are satisfied that the proposal is acceptable in contamination and groundwater terms, complying with relevant parts of Paragraphs 187 and 196(a) of the Framework, Policy SE03 (Land Affected by Contamination) and Policy SE04 (Groundwater Protection) of the Thanet Local Plan (2020).

## **6) Heritage**

- 4.140 The effect of the proposed development on heritage assets is a material consideration. There is a statutory duty under section 66(1) of the Planning (Listed buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving a listed building or its setting or any features of special architectural or historic interest which it possesses - a duty to which considerable importance and weight must be afforded in decision making.
- 4.141 The Framework sets out the national policy background for heritage, with the underlying objective to conserve and enhance the historic environment in chapter 16. 'Significance' is defined in the glossary 'Annex 2' as being the 'value of a heritage asset to this and future generations because of its heritage interest'. The interest may be archaeological, architectural, artistic or historic.' The significance derives not only from an asset's physical presence but also from its setting. A heritage asset's setting is defined as 'the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve.

- 4.142 Paragraph 203(a) of the Framework requires account to be taken of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation. Regarding archaeology, paragraph 200 sets out that where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.
- 4.143 For designated heritage assets, paragraph 212 of the Framework requires great weight to be given to their conservation when considering the impact of a proposed development on their significance. Paragraph 213 requires clear and convincing justification for any harm to, or loss of, the significance of a designated heritage asset. Paragraph 215 requires that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.
- 4.144 For non-designated heritage assets, Paragraph 216 requires a proposal's effect on its significance to be taken into account, and for proposals which directly or indirectly affect non-designated heritage assets a balanced judgement to be made having regard to the scale of any harm or loss and the significance of the heritage asset.
- 4.145 At the local level, Thanet Local Plan Policy HE01 Archaeology promotes the identification, recording, protection and enhancement of archaeological sites and requires developers to submit information in support of applications that allows an assessment of the impact of the proposals on the significance of the heritage asset.
- 4.146 Thanet Local Plan Policy HE03 Heritage Assets states that proposals that affect both designated and non-designated heritage assets will be assessed by reference to the scale of harm or loss to the significance of the heritage asset.

### **Historical Background**

- 4.147 The Site was first developed as a training school for the adjacent Manston Airfield in 1916. The airfield and training centre were the focus of initial operations of the Royal Air Force on its institution in 1918. Both the airfield and training centre continued to play an important role within World War II, although both were subject to heavy bombing and many of the structures and buildings were destroyed.
- 4.148 The site and the airfield were subsequently rebuilt for use by the RAF until the base closed in 1999. More recently the site has been used as an Army Reserve Unit and Air Cadet Squadron (2017-2021).

### **Baseline Assessment**

- 4.149 The Home Office commissioned an Archaeological Desk-Based-Assessment (DBA), and this - alongside the site visits carried out by MHCLG officials - has informed our considerations.

### **Within the Site**

- 4.150 There are no listed buildings, or any other designated heritage assets on the land subject to the proposal (i.e. within the red line boundary).



- 4.151 There are however, seven military heritage assets from the 20<sup>th</sup> Century which are classified as Non-Designated Heritage Assets (NDHA) including the former location for resident's huts (MKE 100326); a former intelligence hut (MKE 98029); three pillbox records (MKE 39389, MKE 39388, MKE 115510); a destroyed concrete structure (MKE 100328); and a Chain Home Low Station (MKE 98429). These are considered to form a grouping of assets as they share significant historical and spatial associations.

### **Within the Study Area**

- 4.152 There are almost 100 records noted within the Study Area (up to 500m from the site boundary) which all relate to non-designated historical and archaeological sites. Those of most relevance to the proposed development site are as follows:
- Cropmark complex in Manston Airfield (MKE 16100)
  - Three Iron Age findspots (MKE 74364, MKE 74388, MKE 74389)
  - Twenty-four 20th Century military heritage assets:
    - a Two Pillbox's (MKE 97294, MKE 39387)
    - b Location for 'Klein-Kampfanlage' (MKE 100331, MKE 98411)
    - c Paired Nissen huts (MKE100108)
    - d Air raid shelter (MKE 16753)
    - e World War II RAF Battle HQ (MKE 98027)
    - f Area of bomb in silos (MKE 100329)
    - g The grouping of Ammunition stores (MKE 98424, MKE 98420, MKE 98423, MKE 98422, MKE 98418, MKE 98417, MKE 98414, MKE 98416, MKE 98415, MKE 98412, MKE 98504)
    - h Bank to contain blast (MKE 98426) Crash site (DKE 20248)

- 4.153 As with the non-designated heritage assets within the site, those within the wider study area that relate to the first and second world wars are considered to form a grouping of assets as they share significant historical and spatial associations.

### **Assessment of Significance**

- 4.154 The Desk Based Assessment (DBA) submitted by the Home Office, notes that as many of the remains of the various non-designated heritage assets within the site have been removed or otherwise destroyed as part of subsequent redevelopment this element of their significance has been lost, leaving these assets to derive significance from their historical and communal interest. As the DBA makes clear at Section 6.1, as no site visit was possible the present state of these assets could not be determined.
- 4.155 The DBA further notes that with regard to the assets outside the site but within the study area, the most important method for the recording and interpretation of that historical significance is the two museums adjacent to the site which allow the history and assets to be enjoyed by the public.

### **Conclusions on Assessment of Significance**

- 4.156 We consider that the research and assessment work undertaken within the DBA is appropriate and these conclusions around significance are justifiable in the context of policy at paragraph 216 of the NPPF.

### **Impact Assessment**

- 4.157 The parameter based application makes it difficult to assess the nature and degree of impact of the proposals on the Non-Designated Heritage Assets precisely.
- 4.158 Section 7 of the DBA considers the greatest potential impacts being on the former residents huts (MKE 100326) as well as the chain home low radio tower (MKE98429). The DBA further notes that there are no mapped or photographic records of the former residents huts although it assumes that there may be some remains sub-surface which have likely been truncated by intervening development. Any demolition and redevelopment within the western part of the site will therefore have the potential to further disturb any remains and likely cause the permanent loss of any remaining historical fabric.
- 4.159 The DBA also notes the recorded location of a pillbox (MKE 39388) on the north-eastern edge of the area that once contained the residents' huts. Again, there are no mapped or photographic records of the pillbox but ground disturbance from LiDAR mapping is evident in the recorded location. The area concerned is currently undeveloped green space and it is likely that sub-surface remains will survive to some degree.
- 4.160 Section 7 also notes that in general terms the parameters based approach makes it difficult to assess the potential impacts of development on any remaining heritage assets or their setting. The site is currently relatively densely covered with development in the western part of the site but conversely relatively open in the eastern section. The permission will enable large-scale changes both to the eastern and western sections which will alter the dispersed character that the site currently has.
- 4.161 The DBA further notes with regard to impacts on NDHA beyond the site, that the mature screening around the site means that most of the assets will not have their settings interrupted by the introduction of new built form within the site.

### **Conclusions on Impact Assessment**

- 4.162 The assessment of impacts is generalised in accordance with the parameters based nature of the application and the lack of specificity about where built form will be sited. However, an appropriate level of control can be gained through the use of a condition to ensure that mitigation measures are taken when detailed development proposals are submitted.

### **Recommended Mitigation**

- 4.163 Section 7.1 of the DBA notes that the HO contacted the Kent Historic Environment Record and the Kent Archaeological Officer to discuss the mitigation strategy. Advice was received by email in July 2023 which noted the historical significance of the area during the World War I and World War II as well as the potential for earlier archaeological remains, but did not provide a more detailed view on appropriate mitigation.
- 4.164 The DBA concludes that recording of any archaeological remains that are found during demolition and redevelopment should be undertaken with particular reference to the non-

designated former residents' huts so that a documented record can be made of this asset before its complete loss.

### **Conclusion on impacts on heritage**

- 4.165 There is only one designated heritage asset within the wider study area (Grade II listed Cheesman's Farm (NHLE 122803). This is 460m north-west of the proposed development site but there is no intervisibility between the listed building and the site, nor is there any shared historical or current association and we are satisfied that there would be no impacts from the proposed development on the heritage asset. Other than this, the site and surrounding Study Area do not contain any designated heritage assets.
- 4.166 The DBA finds that the proposals have the potential to cause a moderate adverse impact to potential sub-surface remains and buildings of the non-designated heritage asset comprising the former residents' huts (MKE 100326) through the potential loss of any and all remaining archaeology. Mitigation for this is proposed through recording of any such remains for subsequent inclusion and interpretation within the Museum.
- 4.167 The DBA concludes that there is potential for the setting of the non-designated former intelligence hut (MKE98029), to be harmed however its location on the periphery of the site and a combination of the distance between it and the extent of proposed development together with existing vegetation will lessen the impact of proposed development on its setting.
- 4.168 The DBA recommends that consultation with the local authority Archaeologist is held in order to establish details of appropriate mitigation. We understand that no response has been received by the HO nor as part of the formal consultation on the UCD application. In any event it is considered necessary to attach a condition to any permission that would require recording of any remains of the residents huts and other non-designated heritage assets and sharing of records with the Kent County Archive.

### ***Response from Consultees***

- 4.169 No response has been received from KCC Archaeology concerning the undesignated heritage assets. Historic England has re-iterated that it has no substantive comments to make (as per its initial response in October 2024).

### ***Conclusions on Heritage Main Consideration***

- 4.170 We consider that the DBA provides sufficient analysis and assessment of the significance of relevant heritage assets (both designated and non-designated) as well as of the potential harm to any sub-surface remains in the case of the non-designated heritage assets, in light of the parameters based nature of the Urgent Crown Development application. We agree with the assessment of potential harm in the context of paragraph 216 of the NPPF and given the significance of the assets we are satisfied that the proposal is acceptable in heritage terms, complying with relevant parts of Paragraphs 200 and 216 of the Framework, Policy HEO1 and HEO3 of the Thanet Local Plan (2020).
- 4.171 A response from the County Archaeologist was not received by the Home Office, and we consider it necessary to attach a Condition to ensure the appropriate level of mitigation of any losses of heritage assets.

## 7) Character and Appearance

- 4.172 The character and appearance of the area is a material consideration. In planning terms, it is relevant to consider the effect of the proposed development on the character and appearance of the area. The following considerations inform this.
- 4.173 The Framework paragraph 135 (c) requires development to be, amongst other things, sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change. Further, the Framework paragraph 187 (a) states that planning decisions should contribute to and enhance the natural and local environment by, among other things, protecting and enhancing valued landscapes (a term not defined by the Framework).
- 4.174 Thanet Local Plan Policy SP26 (Landscape Character Areas) requires development proposals to demonstrate how they respect and respond to the character, key sensitivities, qualities and guidelines of the relevant character areas. All development should seek to avoid skyline intrusion and the loss or interruption of long views of the coast and the sea. Development should also maintain a distinction between town and countryside. Policy SP26 will only permit development that conflicts with these principles where it can be demonstrated 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 GIO6 (Landscaping and Green Infrastructure) requires major development to demonstrate how the proposal will provide landscaping and green infrastructure to enhance the setting of the development.
- 4.175 Thanet Local Plan Policy SP35 (Quality Development) requires new development to be of high quality and of an inclusive design. These principles are reinforced by Policy QDO2 (General Design Principles), with the policy aim to also ensure new development promotes or reinforces local character of the area.
- 4.176 The Site is located within the 'A1: Manston Chalk Plateau' landscape character area. The Chalk Plateau landscape character type is described in the Thanet Local Plan (paragraph 4.19) as ...*"a generally flat or gently undulating landscape, with extensive, unenclosed fields under intensive arable cultivation. This open landscape is fragmented by the location of large scale developments such as the former airport, Manston Business Park and a sporadic settlement pattern to the north of the airport. The character of this area is also identified by the proximity of the edges of the urban areas...The elevated central chalk plateau also forms a skyline in many views back from lower landscapes in Thanet, including the coast and marshlands."*
- 4.177 A Landscape and Visual Impact Assessment (LVIA) and Landscape Strategy have been submitted by the Home Office. The LVIA has been undertaken with regard to the relevant guidance, notably the guidance published by the Landscape Institute and Institute of Environmental Management and Assessment, and conducted by a Chartered Landscape Architect with 20 years' experience. The LVIA has been undertaken using the 'Rochdale Envelope Method'. This approach uses the maximum parameters for the proposal to ensure the worst-case scenario of the proposal is assessed, in terms of potential adverse effects. The LVIA sets out that in considering the maximum parameters of the proposed MRC and permanent training facility, this thereby also considers the existing and retrospective ITPC.

- 4.178 The maximum parameters used to define the proposal include:
- Location of the proposal within the Site can be anywhere within the project extents (red line) as shown on the Site Location Plan (drg. No: 050836-9834-ATR-ZZZ-XX-DR-A-0001-S4-Do100, Rev P05).
  - The proposal will consist of building heights of a maximum of 6m at the perimeter and 12m at the centre of the Site as shown on the Development Zone & Maximum Building Heights Plan (drg. No: 050836-9834-ATR-ZZZ-XX-DR-A-0350-4-Do100, Rev P12\*).
  - Fencing will be at a maximum height of 6m as depicted on the Security & Fence Access Plan (drg No: 050836-9834-ATR-ZZZ-XX-DR-A-0356-S4-Do100, Rev P05\*).
  - The proposal will comprise a maximum development area of 108,982 GEA sq. m.
  - The LVIA makes an assumption that there will be mitigation planting between the visual receptors and the proposed development.
- \*the LVIA has utilised plans of previous revisions however changes are considered non-material when compared to latest revisions and therefore do not impact the findings of the LVIA.*
- 4.179 The assessment confirms it has also considered the findings contained within the Landscape Strategy and the Tree Protection Plans (Appendix D of the Arboricultural Impact Assessment) submitted.
- 4.180 The landscape sensitivity and impact assessment has been undertaken on the Local Landscape Character Areas (rather than National and Regional Character Areas) as the LVIA considers it to be the most appropriate scale against which to assess the proposal due to the variation in landscape character within the study area. The LVIA however finds that the proposal would not result in significant effects on landscape character at a national or regional level.
- 4.181 The LVIA identifies the relevant characteristics of the A1: Manston Chalk Plateau (as set out in the Council's Local Level Landscape Character Assessment, August 2017) and confirms that the Site is not covered by any statutory landscape designations, is not located in a conservation area nor contains any statutory listed buildings. The closest listed building is located c.475 metres to the west of the Site (Cheeseman's Farm – Grade II Listed) and a Schedule Monument is positioned c.800 to the north-west of the Site. The LVIA concludes that the nature of the landscape character is partly able to accommodate the proposed development with the landscape sensitivity judged to be 'Moderate'<sup>10</sup>.
- 4.182 The LVIA identifies visual receptors within the vicinity of the Site which it considers are of high sensitivity. This includes approximately 11 properties on Esmonde Drive, Musgrave Close and Tollemache Close (located 30m to the south of the Site); approximately eight properties on Mannock Drive and Bowmans Walk (located 40m to the south-west); No.1 Woodchurch Road (located 420m to the west); The Bungalow Queendown Road (located 50m to the north-west); and the Coach House, Manston Road (located 170m to the north east).

---

<sup>10</sup> Table 2 of the LVIA, p.21, defines 'Medium' Landscape Sensitivity as "Landscapes of local or regional recognition of importance able to accommodate some change (i.e. features worth of conservation, some sense of place or value through use/perception).

4.183 Informed by the above, the LVIA considers the potential impacts that could result from the proposal on the landscape and visual receptors during both the construction and operational phases as follows:

### **Construction**

- *Landscape* - landscape changes anticipated to occur include loss of vegetation, alteration to landform, presence of construction machinery and introduction of man-made features. Alteration to landform to facilitate construction of the MRC will alter ground levels and therefore the existing setting of the landscape character. However, this would be a temporary adverse impact.
- *Visual* - receptors may be affected by views of heavy goods vehicles, temporary construction lighting and other tall machinery. However, potential visual effects of construction activities would be temporary, short-term and reversible.

### **Operation**

- *Landscape* - the potential landscape effects of the proposal include loss of vegetation (including considerable tree loss), alteration to the landform and ground level, demolition of existing buildings, introduction of buildings and associated service roads. The potential effects on the landscape character would be focused around the western and eastern areas of the Site, should the proposal be located within those vicinities, by introducing new build elements which would encroach on the landscape setting, resulting in a reduction to the rural setting. Landscape impacts would therefore be experienced on a local level.

*Visual* - the LVIA sets out that the operational visual impacts of the proposal are likely to be in the long-term. The LVIA considers there would be a 'Slight Adverse'<sup>11</sup> visual effect on residential properties at No. 1 Woodchurch Road, Bungalow Queendown Road, Esmonde Drive, Musgrave Close, Tollemache, Mannock Drive & Bowmans Walk where they have filtered views towards the Site. However, these views towards the completed proposal will be reduced by maturing mitigation planting which will reduce the likely visibility of the proposed buildings. A planning condition is therefore proposed requiring submission of a LEMP comprising details of ecological design, including visual screening measures to be implemented by the SSHD, alongside ecological mitigation and enhancement to satisfy Policy GIO6 (Landscaping and Green Infrastructure). Planning conditions are also proposed to limit the maximum development parameters, and against which the LVIA has been assessed, to ensure the developments form, scale and size of the proposal within the countryside is appropriate and to limit intrusion of the skyline. Should planning permission not be granted, it is considered this would have an adverse impact on the socio-economic well-being of the area, including a loss of employment (Section 18 below) and because the SSHD's capability to bring those entering into the UK by irregular means could impact on community cohesion and national security (Section 1 above). The development is therefore essential for the social well being of the area.

A further condition requiring the SSHD to submit detailed floor, section and elevation plans for the relevant part of development, prior to commencement, is also attached.

---

<sup>11</sup> LVIA, Table 7 (p.26) defines 'Slight Adverse (Negative) Effect' as "The project would: Not quite fit the character (including quality and value of the landscape); Be at variance with characteristic features and elements; Detract from a sense of place."

Detailed designs of the proposal are not submitted at this stage and a condition is required to ensure sustainable and high-quality development is secured in accordance with Policy SP35 (Quality Development) and the principles of Policy QDo2 (General Design Principles).

### ***Response from Consultee***

- 4.184 Thanet District Council comment that the existing enclosed nature of the Site and lack of a wider visual impact on the Landscape Character area means that any impact is anticipated to be localised. The Council also notes, it is not clear from the submission the mechanism for consideration of the design of the building to be constructed including appearance, materials etc. The Council requests the ability to comment on these matters through planning conditions, or a similar mechanism. Similarly, the design of the potentially 6 metre high boundary fence, directly adjacent to Manston Road, has the potential for a localised oppressive impact adjacent to residential properties, and the Council would welcome the opportunity to comment on the details of its appearance.
- 4.185 Information submitted to discharge planning conditions pursuant to any planning permission for this Urgent Crown Development will be assessed by the SSHCLG. This mechanism will require the Home Office to submit floor, elevation and section plans and material details prior to commencement to ensure detailed design matters are considered.

### **Conclusions on Character and Appearance**

- 4.186 The LVIA finds that the proposal 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. The proposal would have a 'Slight Adverse' visual effect on some residential properties where they have filtered views towards the site. These views towards the completed scheme will be reduced by maturing planting between these receptors and the proposed development, which will reduce the likely visibility of the proposed buildings.
- 4.187 We consider that the Site is largely enclosed as a result of its historic use and screened by boundary vegetation and external fencing with green scrim screening, and as such we agree that changes to landscape character will be noticed only at a local level. A planning condition requiring measures of visual screening, as part of a LEMP, alongside ecological mitigation and enhancement, is proposed to ensure the proposals compliance with the relevant parts of Paragraphs 135 and 187 and Thanet Local Plan Policy SP24 and G106. With the absence of design detail at this stage, planning conditions are also proposed requiring the SSHD to submit floor, elevation and section plans and material details for determination to ensure detailed design matters are considered prior to commencement to address Policies SP26, SP35 and QDo2.

## **8) Flood Risk**

- 4.188 Flood risk is a material consideration.
- 4.189 Flood risk is addressed in paragraphs 170-182 of the Framework. Paragraph 181 of the Framework requires that when determining planning applications, decision-takers should ensure that flood risk is not increased elsewhere. Development should only be allowed in areas at risk of flooding where a flood risk assessment demonstrates that the most vulnerable development is located in areas of lowest flood risk; the development is flood

resilient and incorporates sustainable drainage systems where appropriate; any risks can be safely managed and safe access and escape routes are included. Paragraphs 172-175 of the Framework require sequential and exception tests as part of a flood risk assessment in some circumstances.

- 4.190 Policies CCo1 (Fluvial and Tidal Flooding) and CCo2 (Surface Water Management) of the Thanet Local Plan support the Framework, requiring development proposals of over 1 hectare to be supported by a Flood Risk Assessment that addresses flood risks from all sources including surface and ground water. Proposals for new development should manage surface water using sustainable drainage systems and demonstrate how guidance produced by the Lead Local Flood Authority (LLFA) has been applied in any proposals for major development.
- 4.191 A Flood Risk Assessment (FRA) and Drainage Feasibility report have been submitted in support of the application. The FRA notes that the proposed development has mixed classification of 'More Vulnerable' and 'Less Vulnerable' areas of development as defined in Annex 3 of the NPPF.

### ***Hydrogeology***

- 4.192 The bedrock is classified as Margate Chalk Member, a designated Principal Aquifer and the site is located in Source Protection Zone 3 (SPZIII). There are no abstraction boreholes for public water supply within 1km of the site and the risks to potable groundwater abstractions are considered 'negligible'.
- 4.193 The FRA states that a drainage strategy report will be prepared for each of the development areas detailing the specific mitigation measures for each area to ensure sufficient treatment to surface water runoff. Due to the parameters based approach to the Urgent Crown Development application it will be necessary to control development through a condition that requires a drainage strategy to be submitted and approved, with phase or area based details to be agreed for each phase or application for development prior to development taking place.

### ***Fluvial and Coastal Flood Risk***

- 4.194 The site is located in Flood Zone 1 with very low risk of flooding from rivers and the sea (less than 0.1% each year) and there is therefore no mitigation measures proposed against this source of flooding.
- 4.195 There are no main rivers or watercourses in close proximity to the site boundary and the nearest extent of flood zone 2 or 3 are more than 3km from the site boundary and on this basis the FRA considers it unlikely that climate change will have an effect on this source of flooding in the lifetime of the development.

### ***Pluvial Flood Risk***

- 4.196 The FRA identifies an observable flow path (1:1000 year event) that crosses the site from the southeast to the northwest and affects the south-western part of the site. This appears to arise from historic in-filling of a series of features in the early twentieth century (ponds, marshes, streams). It is noted that the main drainage spine of the existing drainage system follows a similar direction to the flow path and may have been constructed in place of the historic path.



- 4.197 Most of the flow path is identified to be at low risk of flooding however there are isolated spots at low points that are identified as medium to high risk of flooding.
- 4.198 Mitigation measures are proposed in the FRA for the various buildings that are proposed within the area affected by the flow path, comprising raising finished floor levels by up to 450mm above existing ground levels in order to make them safe from flooding.
- 4.199 These measures together with the provision of a sustainable drainage system will provide a betterment on the current surface water drainage position. Further details and the implementation of these measures should be secured by conditions.

### ***Groundwater Flood Risk***

- 4.200 There is a 'very low' identified risk of groundwater flooding across the site as the depth to groundwater level is between 20m and 45m below the surface. No mitigation measures are considered necessary.

### ***Flooding History***

- 4.201 There are no reports of historic flooding at the site.

### ***Sequential & Exception Test***

- 4.202 Advice on the sequential test is provided in the Framework (paras. 173-179), with additional guidance provided in the PPG. The FRA correctly identifies the site within Flood Zone 1 and consequently no sequential test is required for fluvial or tidal flood risk. Section 4.1 of the FRA considers that a sequential test is required due to the medium risk of surface water flooding and provides a brief narrative which explains why there is no reasonably available alternative site allocated in the Thanet Local Plan to accommodate the development. Whilst the applicant could have provided a more comprehensive assessment, including with an assessment of possible unallocated sites which have a lower modelled occurrence of possible surface water flooding, the locational and ownership considerations referenced are recognised as particularly relevant in this case. Further, the modelled on-site occurrence of surface water flooding is localised and confined to a single path which does not affect the principal access. Consequently, and on balance, considerations relating to the flood risk sequential test have been addressed.
- 4.203 The FRA includes consideration of the applicability of the exception test at section 4.2 and ultimately concludes one is not required, although the basis for this view is not clear. Advice on the exception test is provided in the Framework (paras. 178-179), with additional guidance provided in the PPG. Paragraph 32 of PPG states that the exception test should only be applied where required within Table 2 of the PPG (PPG ID 7-079-20220825). With reference to Table 2, no exception test is required, for the proposed more vulnerable uses or otherwise, as the site is within Flood Zone 1.

### ***Drainage Feasibility***

- 4.204 The submitted Drainage Feasibility report outlines surface and foul water drainage strategies.

### ***Surface Water***

4.205 In relation to the findings of the Flood Risk Assessment it is proposed that surface water drainage is managed via a sustainable drainage system of swales, bioretention systems and attenuation systems before being discharged into the ground. The Environment Agency has requested by letter of 11 November 2025 that a condition be attached to ensure that prior to occupation of the new authorised development, written details of the surface and foul water drainage plan have been submitted to and approved by the SSHCLG and that the system must then be constructed in accordance with the approved details prior to occupation.

4.206 The strategy for the Short-term Holding Unit within the retrospective element of the permission has been to create a soakaway system around the perimeter of the site at a depth of 1.5m to avoid areas of soil contamination (Land Contamination and Ground Water Main Consideration).

### ***Foul Water***

4.207 The strategy for the Short-term Holding Unit within the retrospective element of the permission, a Section 106/107 Agreement has been signed with Southern Water to enable foul water from the Unit to be pumped to the existing Southern Water sewer.

4.208 Southern Water has confirmed via a pre-planning enquiry that there is insufficient capacity within the existing 225mm foul sewer to receive the net increase in foul water from the proposed development. However, Southern Water has advised that they aim to provide the required capacity within 24 months following the grant of planning permission (i.e. December 2027).

4.209 In view of this lack of capacity and uncertainty around when it may be provided, five alternative design solutions (options) are identified (doc ref: 50836-9834-ATR-XXX-XX-RP-C-0003-S2-A4300):

- 1 Discharging foul water into the existing Southern Water sewer with an interim solution of treating foul water discharge in a temporary sewage treatment plant before being discharged into the underlying ground.
- 2 Treatment of foul water through a temporary sewage treatment plant. It is proposed that the treated grey water will be discharged into the nearest watercourse (River Stour).
- 3 Discharge of foul water to the nearest Southern Water connection point with adequate capacity to manage the foul water generated from the development. It is understood this connection point is 3.7km from the site.
- 4 Storage of foul sewage on-site for short periods of time before being disposed of offsite by the use of tankers.
- 5 Managing on-site some of the surface water run-off that currently discharges into the existing sewer. This proposal would allow the discharge of foul water to the existing Southern Water sewer from the proposed development.

4.210 The first four options would require further survey work and permits from the Environment Agency/further agreements with Southern Water before they could be confirmed as potentially suitable and deliverable.

4.211 The fifth option has not been discussed further with Southern Water.

4.212 The Drainage Strategy concludes that Option 1 is recommended.

***Response from Consultees***

4.213 The Environment Agency (EA) responded on 11th November 2025 and have maintained their comments on foul drainage and in particular their concerns around an interim onsite wastewater treatment plant and any associated discharge to ground, which is located in the catchment zone for several public water supplies. Should this interim measure be pursued the applicant is strongly advised to consult the licence holders for local groundwater abstraction (including Southern Water).

4.214 The EA has recommended attaching the following Condition:

***Condition 4: Foul and surface water drainage***

*No part of the new authorised development is to be occupied until for that part, written details of the surface and foul water drainage plan, have been submitted to and approved in writing by the relevant planning authority. The submitted details must demonstrate:*

- 1. The surface and foul water drainage system must be constructed in accordance with the approved details, unless otherwise agreed in writing by the relevant planning authority.*
- 2. No part of the new authorised development is to be occupied until the construction of the entire surface and foul water drainage for that part is completed.*
- 3. Where an attenuation basin is being proposed, the attenuation basins must be completed within the first phase of construction if construction is undertaken in phases.*

4.215 Kent County Council has responded as Lead Local Flood Authority (LLFA) and has similar concerns to the EA and has advised that ground investigations are undertaken to support the positioning of soakaways and that contamination testing is undertaken to ensure that infiltration occurs into clean, unworked material to protect groundwater quality.

4.216 With regard to treatment of surface water the LLFA recommend that surface water from car park areas passes through above-ground SUDS features and if necessary proprietary treatment devices to ensure contaminant removal.

4.217 In terms of future design the LLFA request that modelling using a climate change allowance at the upper end of the 2070s Epoch for both 3.3% and 1% Annual Event Probability is applied. Current guidance from .gov mapping indicates this is 45%. They also advise that any assessment of infiltration features uses the latest Flood Estimation Handbook rainfall dataset (2022).

***Conclusion on Flood Risk***

4.218 It is concluded that the identified risks in respect of flood risk and drainage can be satisfactorily addressed by the proposed planning conditions relating to mitigation of pluvial flood risk as well as surface and foul water drainage, having regard to the consultee responses outlined above, which are proposed to be attached to any decision.

4.219 As noted above, the Drainage Strategy concludes that Option 1 is recommended. That solution would require controls over design and odour and a condition is therefore considered necessary to be attached to the UCD. The Environment Agency has requested

that a condition be attached to ensure that prior to occupation of the new authorised development, written details of the surface and foul water drainage plan have been submitted to and approved by the SSHCLG and that the system must then be constructed in accordance with the approved details prior to occupation.

- 4.220 However, we understand that the Home Office intend to proceed with Option 4 (Removing foul sewage by tankers). The Home Office confirm in their response to MHCLG Clarification questions that trip rate/generation within the submitted Transport Assessment does account for additional vehicle movements, including servicing vehicles. A planning condition is recommended to be attached to the Decision Letter to secure a Travel Plan, and this includes a requirement to prohibit foul sewage tankers from servicing the Site during peak highway periods, until the local highway mitigation discussed in Main Consideration 4 above is completed.
- 4.221 Should the Home Office choose to proceed with permanent arrangements for wastewater treatment (i.e. Option 1) then planning conditions on the Decision Letter should require the SSHD to confirm that sufficient capacity is available in the local waste water network to accommodate the development, prior to occupation of the MRC. In the event that insufficient waste water capacity in the local network is available, then the SSHD is required to submit a wastewater treatment strategy with the SSHCLG prior to first use of the MRC.
- 4.222 On this basis we are satisfied that the proposal is acceptable in flood risk and drainage terms, complying with relevant parts of Paragraph 181 of the Framework, Policy CCO1 (Fluvial and Tidal Flooding) and CCO2 (Surface Water Management) of the Thanet Local Plan (2020).

## 9) Biodiversity

- 4.223 The impact of development on biodiversity is a material consideration.
- 4.224 Paragraph 187 of the Framework advises that planning decisions should contribute to and enhance the natural environment by recognising the intrinsic beauty of the countryside and the other benefits of trees and woodland; minimise impacts on biodiversity including by establishing coherent ecological networks and incorporating features which support threatened species
- 4.225 However, as paragraph 003 of the Planning Practice Guidance on biodiversity net gain (BNG) confirms (reference ID 74-003-20240214) the biodiversity net gain condition does not apply to Urgent Crown Development granted under S.293A of the TCPA (1990).
- 4.226 Policy SP27 of the Thanet Local Plan supports the framework by requiring development proposals, where possible, to safeguard Thanet's Green Infrastructure network and enhance it, by integrating new multifunctional Green Infrastructure provision in the design of developments. Policy SP30 of the Thanet Local Plan also requires development proposals to make a positive contribution to the conservation, enhancement and management of biodiversity assets through the restoration and enhancement of existing habitats; the creation of wildlife habitats; the creation of linkages between sites; the enhancement of significant features of nature conservation value on development sites and mitigating against the loss of farmland bird habitats.

4.227 Two primary reports on biodiversity have been submitted in support of the application; an Ecological Appraisal (EcA) and Ecological Impact Assessment (EcIA). A number of surveys have also been submitted:

- Badger survey (Confidential) (March 2025)
- Bird survey (March 2025)
- Bat survey (March 2025)
- Great Crested Newt survey (March 2025)
- Arboricultural Impact Assessment (June 2025)
- Botany Survey (June 2025)

### ***Ecological Appraisal***

4.228 The Appraisal notes that the site is not within any statutory or non-statutory designated nature conservation sites.

### ***Statutory Designated Sites***

4.229 There are five statutory designated sites within 5km of the site boundary including two Special Areas of Conservation; one Special Protection Area; two Sites of Special Scientific Interest; one National Nature Reserve and one Ramsar Site. The Appraisal considers the nature of the proposed development and its relationship to these designated sites and concludes that the proposals will not impact on them.

4.230 A Habitats Regulations Assessment (HRA) Screening was undertaken and concluded that there will be no significant effects on any European designated site as a result of the proposed development.

### ***Local Wildlife Sites***

4.231 The Appraisal records that the site lies around 1.8km from the closest local nature reserve, however given the separation distance and the character and scale of the proposed development no viable pathway or impact upon the local nature reserve is considered to exist.

### ***Ancient Semi-Natural and Ancient Replanted Woodland***

4.232 There are no Ancient Semi-Natural or Ancient Replanted Woodlands within 2km of the site.

### ***Habitats on Site***

4.233 The Appraisal states that the site comprises a mix of built form, hard-standings, ornamental scrub planting, broadleaved and mixed woodland, calcareous grassland, scattered trees, hedgerows and standing open water.

4.234 The Appraisal notes one substantial area of grassland within the eastern part of the site which sits over a calcareous substrate and is likely a calcareous grassland type. It goes on to recommend that a specialist invertebrate ecologist should complete a site assessment and examine the potential importance of the calcareous grasslands, mature trees and other habitats for invertebrates.

- 4.235 The Appraisal notes the potential for some of the buildings to support fauna of interest and this is picked up further in species surveys discussed below.

***Recommendations for Impact Avoidance, Mitigation and Compensation***

- 4.236 The Appraisal recommends that the emerging proposals should, wherever possible avoid direct impacts to mature trees and areas of flower-rich chalk grassland and artificial lighting should be avoided in areas close to these habitat types because of the identified harm that it can have on invertebrate populations. The Appraisal also recommends the removal of recently planted Cherry Laurel and replacement with suitable native alternatives.
- 4.237 As the Appraisal notes, the extent of mitigation and/or compensation is unknown until the location and design of the built development has reached a detailed stage. That notwithstanding, measures to avoid, mitigate or compensate for impacts are set out in the Ecological Impact Assessment, and considered further below.
- 4.238 Further survey work has been undertaken since the Appraisal was submitted and given that some survey results are anticipated to be submitted beyond determination of the UCD it is necessary to make submission of updated surveys subject to a condition. That condition refers to the requirement to submit the following surveys to the SSHCLG:
- Updated invertebrates survey;
  - Updated reptile survey;
  - Updated bat survey; and
  - Updated botany survey.

***Arboricultural Impact Assessment***

- 4.239 The AIA notes that there are no trees with protected status on the site (Ancient Woodland, Veteran Tree or Tree Preservation Order).
- 4.240 The submitted assessment indicates a large number of trees for removal, the loss of which has not been justified. Both the EcA and EcIA documents note the ecological value of the mature trees and woodland on the site for a number of species including bats, birds and invertebrates and in the absence at this stage of detailed plans for the number and location of buildings we do not see the justification for the indicated level of tree removal.
- 4.241 The submitted Tree Protection Plans also show areas of tree groups along the boundaries that are proposed to be cut back to facilitate potential built form or fence installation. These boundaries are highlighted in the bird and bat surveys for their potential to support those species as well as others, and we are not satisfied that there is sufficient evidence to justify their loss.
- 4.242 A planning condition to protect Category A and Category B trees is recommended in Appendix 1. The condition also requires the SSHD to consider compensatory planting for the loss of trees/hedgerows.

### ***Badger Surveys***

- 4.243 Although the field survey did not find any evidence of badgers on-site it is noted that the grassland areas together with scattered trees and hedgerows provide suitable foraging, commuting and burrowing opportunities.
- 4.244 Recommendations suggest considering updating surveys 18 months or more after the initial survey (i.e. 18 months or more after December 2024 noting winter months are the optimum time for conducting badger surveys) and also conducting quarterly Badger walkover surveys during the construction phase of the proposed development.
- 4.245 It is considered that a condition is required to be attached to secure the conduct and submission of updated badger surveys.

### ***Bat Surveys***

- 4.246 The EcA notes that a number of bat species have been recorded within 5km of the site. The suitability of habitats within the site for bats was assessed and it was noted that bats are likely to use the hedgerows, trees, and woodland edge habitats for foraging and commuting. In addition, several features within the site may have the potential to support bat roosts including trees and some of the buildings.
- 4.247 The report identifies the following recommendations:
- Updated inspections of certain buildings if works or demolition is proposed;
  - The removal of any low suitability trees should be completed under a Precautionary Working Method Statement for Bats; for trees of moderate or high suitability further survey work will be required;
  - Boundary vegetation should not be illuminated beyond current baseline levels; and
  - Further bat boxes installed in key dark areas of the site surrounded by suitable habitat to provide additional roosting features within the site.
- 4.248 These recommendations will be incorporated within the CEMP, to be secured via a planning condition.
- 4.249 There is a current bat mitigation licence (2023-65983-EPS-MIT) in place which relates to a number of mitigation measures that are expected to be retained as part of any further development or suitably amended via an amended/replacement licence. These are summarised below and relate to concerns raised above about proposed loss of trees and tree groups:
- 7 x bat boxes have been installed on trees to compensate for loss of bat roosts destroyed under licence (2x previously installed in the Excavated Land area have been moved);
  - A dark corridor with light not exceeding pre-development baseline level is being implemented around retained bat roost building KK1/038;
  - Connectivity between the retained bat roost building and boundary vegetation, maintained through the installation and management of strategically positioned fence and hedge lines; and

- Planting around retained bat roost building has been designed to attract invertebrates and provide foraging opportunities for bats.

### ***Bird Survey***

- 4.250 The field survey noted a range of suitable habitats for a diverse range of bird species including buildings, scattered scrub and tussocky grassland. These habitats are suitable for a number of declining species which are on red status or are Species of Principal Importance, such as House Sparrow, Song Thrush and Starling.
- 4.251 The survey recorded a pair of Long-eared Owls on three occasions in May and June 2024 as well as young calling. They were recorded along the tree belt adjacent to the north/northwest boundary of the site and foraging areas across the grassland on the eastern part of the site.
- 4.252 Two Red list species, Grey Partridge *Perdix perdix* and Corn Bunting *Emberiza calandra* and three Amber list species, Reed Bunting *Emberiza schoeniclus*, Whitethroat *Curruca communis* and Kestrel *Falco tinnunculus* were recorded on-site. One other Rare UK breeding species Hobby *Falco subbuteo* was also recorded.
- 4.253 The Appraisal recommends that where possible the emerging proposals avoid direct impacts to aquatic habitats; mature native trees; woody vegetation and patches of scrub.
- 4.254 Further work is recommended as follows:
- Retention of the majority of the grassland covering the eastern part of the site and the replacement of any that is lost by vegetated corridors to allow Long-eared Owls to move between the breeding area on the north-west boundary and the foraging area.
  - Any artificial lighting within or close to the north/northwestern site boundary and the grassland area covering the eastern part of the site should be reviewed by an ecologist to ensure that they are not illuminated above current baseline levels.
  - Any vegetation clearance or building work should be conducted during the period mid-September to February (inclusive) which is outside the bird nesting season.
  - If this is not possible, a nesting bird check will need to be undertaken by a suitably experienced ecologist prior to commencement.
  - Any active nests that are discovered will need to be retained and protected in-situ until no longer in use by nesting birds. If a Schedule 1 species is found to be nesting on-site then appropriate mitigation measures will be required.

- 4.255 These recommendations will be secured by conditions.

### ***Great Crested Newt Survey***

- 4.256 The GCN Survey found no records of GCN within 2km of the site. The field survey of the site identified four waterbodies, but it was considered unlikely that any of them would contain GCN.
- 4.257 On this basis no mitigation specific to GCN is considered to be required. However, enhancements for other amphibian and reptile species could be made including the creation of green corridors through the site incorporating brash/log/rock piles to provide shelter and overwintering opportunities and designing SuDS with biodiversity in mind.



- 4.258 These recommendations should be incorporated and secured within the LEMP and secured via condition.

***Botany Survey***

- 4.259 The Survey area was restricted to the easternmost part of the site together with certain parcels of land on the northern part of the site. However, within the survey area the presence of Section 41 Habitats and Species of Principal Importance for Biodiversity under the NERC Act 2006 and Schedule 8 species under the Wildlife & Countryside Act 1981 were identified.
- 4.260 Most notably, the grassland areas in the eastern part of the site were concluded to have been established in the mid to late 19th Century and are very rare on the Isle of Thanet. Those grassland areas on the Shooting Meadow and Sports Ground area are considered to be of at least County importance.
- 4.261 The Survey recommends that the calcareous grassland (Priority Habitat at County Level) be retained and managed, including the light yellow area on Map 4. However, we note that the Development Zone & Max Building Heights Plan appears to contradict this, identifying the area within the Operational Development Zone of up to 12m height. We have explored this with the HO in the context of flexibility sought within the proposal and have resolved to deal with the resulting uncertainty by controlling the location of development via condition requiring the submission of details and any associated mitigation for approval.
- 4.262 Species listed as vulnerable on the Gt Britain and England Red Lists should be conserved. Basil Thyme is one of these together with Field Scabious and Field Mouse-ear. Management and conservation of these three species is required and referred to at paras 6.4 - 6.9 of the Botany Survey.
- 4.263 A requirement to produce a translocation method statement if development is required in a location containing Basil Thyme is therefore proposed within the CEMP condition at Appendix 1.
- 4.264 A licence will be required for any works in areas where the Lizard Orchid is present - there is one particular area where that may be required - the development zone fronting onto Manston Road.

***Ecological Impact Assessment***

- 4.265
- 4.266 The EcIA sweeps up the findings of the various species surveys and the EcA and presents a series of recommendations for mitigation to address each of them. The primary vehicles for securing mitigation are noted to be:
- Habitat Compensation Report;
  - Site-wide Landscape and Ecology Management Plan (LEMP);
  - Updates to the current Outline Construction Environmental Management Plan (CEMP) and/or production of a new CEMP by relevant contractors;
  - Translocation Method Statement for Basil Thyme; and
  - Site-wide External Lighting Design (see paragraph 4.225 in the Lighting Assessment and recommendations below).

4.267

The conclusions of the EcIA on required mitigation are as follows:

- 1 **Excavated Land** - loss of this land should be mitigated via delivery of 6.0 habitat units on-site. A Habitat Compensation Report should be required to be submitted through a condition. Implementation of that habitat creation can then be secured through a LEMP, also to be subject of a condition.
- 2 **Woodland in Western Corner of Site** - loss of this habitat could result in a significant negative impact and an ecologist should work with those preparing detailed proposals for development in this part of the site to avoid the removal of the majority of this priority habitat. This can be secured through the LEMP.
- 3 **Shooting Range Meadows and Sports Ground Area** - these areas are identified as Section 41 Priority Habitats (NERC Act 2006) and are of County importance. Avoidance of impacts is recommended, to be secured within the LEMP. Where avoidance is not possible then mitigation for loss of this habitat is recommended to be described in a Habitat Compensation Report and implemented via a LEMP.
- 4 **Verges and Lawns and other areas of Calcareous Grassland** - presence of these areas is considered to be of local importance and loss of all areas or large-scale degradation would cause significant negative impact. Avoidance of impacts is recommended, to be secured within the LEMP. Where avoidance is not possible then mitigation for loss of this habitat is recommended to be described in a Habitat Compensation Report and implemented via a LEMP.
- 5 **Lizard Orchid** - presence is considered to be of local importance. Loss of Lizard Orchids would result in a significant negative impact. Should proposals include works in areas where Lizard Orchids are present, appropriate licences must be applied for from Natural England. Where loss cannot be avoided, compensation must be provided and described in a Habitat Compensation Report and implemented via a LEMP.
- 6 **Basil Thyme** - presence of Basil Thyme is considered to be of local importance. Loss would result in a significant negative impact. Where development takes place and Basil Thyme is present, compensation is required via translocation of the plant following a Translocation Method Statement along with appropriate compensation measures described in a Habitat Compensation Report and implemented via a LEMP.
- 7 **Strawberry Clover, Field Scabious and Field Mouse-Ear** - presence of Strawberry Clover, Field Scabious and Field Mouse-Ear is considered to be of local importance. Loss of these species would result in a significant negative impact. For Field Mouse-Ear, impact avoidance is appropriate as the species is present in the Shooting Range Meadow. Strawberry Clover and Field Scabious are spread across the calcareous grassland and it is anticipated that some areas containing these species will be lost as part of the proposals. Mitigation is required through minimising loss and maximising habitat enhancement through a LEMP. Where compensation is required that should be described in a Habitat Compensation Report and implemented via a LEMP.
- 8 **Bats** - the Bat assemblage is considered to be of local importance. Loss or degradation of commuting or foraging habitats or loss of roosting sites could result in a significant negative impact on bat assemblage. Avoidance of damage to habitats and/or mitigation should be implemented through the CEMP. Provision of pre-work checks on buildings

and trees should be included in the CEMP and bat mitigation licences must be applied for if required. Some bat roosts have already been destroyed under the existing bat mitigation licence. Trees with potential roost features were removed. Compensation for the loss of these potential roost features will be provided in the form of bat boxes installed in suitable locations across the site and confirmed in the Habitat Compensation Report and implemented via the LEMP.

- 9 **Long-eared Owls** - presence is of County significance. Significant impacts to the population due to the loss or degradation of commuting routes or foraging areas would result in a significant negative impact. Avoidance of some impacts will be achieved through the retention of the Shooting-Range Meadows. A CEMP is required to mitigate the impacts of construction activities on the population. Negative impacts on the commuting routes must also be avoided as more detailed designs for development come forward. An ecologist should work closely with designers to ensure that removal of key commuting routes and their features is avoided. Updated site plans will be included in a LEMP.
- 10 **Birds** - presence is of local importance. Loss or degradation of habitats would result in a significant negative impact. Mitigation methods will be required to be set out in the CEMP to ensure features are not lost or degraded.
- 11 **Invertebrates** - presence is unlikely to be of greater than County importance. In the absence of mitigation, the proposals could have significant negative impacts on the population. Mitigation of possible impacts of construction activities will be detailed in the CEMP and implemented accordingly.

### ***Response from Consultees***

- 4.268 Natural England (NE) has responded by letter of 11 November 2025 and confirmed it has no objection to the proposed development.

### **Habitats Regulations Assessment**

- 4.269 With regard to the potential for recreational disturbance to the Thanet Coast and Sandwich Bay SPA and Ramsar site it is concluded that provided there is no net increase in residential accommodation within the former Commandants House then NE is satisfied that recreational impacts to the coastal SPA and Ramsar site are unlikely to result and therefore in respect of the Habitats Regulations they advise the SoS to record that a likely significant effect can be ruled out.

### **Sites of Special Scientific Interest**

- 4.270 Natural England advise that as there is no hydrological connection between the application site and the Thanet Coast SAC and SSSI (as demonstrated in the submitted Report to Inform HRA Stage 1 Screening) it is unlikely that any adverse impacts to the Thanet Coast SSSI would result from any ground and surface water pollution from the proposed development.

### ***Conclusion on Biodiversity***

- 4.271 There are a range of species and habitats on-site that require protection. The parameters based nature of the application means that there is little specificity about where development will be located and therefore what the impacts will be and in this context we

consider it necessary to attach conditions to the decision that require submission of updated surveys and proposals for mitigation measures that respond to detailed development proposals. With these conditions attached we conclude that the identified risks in respect of impacts on biodiversity can be satisfactorily addressed.

- 4.272 On this basis we are satisfied that the proposal is acceptable in biodiversity terms, complying with relevant parts of Paragraph 187 of the Framework, Policies SP27 (Green Infrastructure) and SP30 (Biodiversity and Geodiversity Assets) of the Thanet Local Plan (2020).

## **10) Noise**

- 4.273 Noise is a material consideration. In planning terms, it is relevant to consider the effect of the proposed development on this, informed by the following.
- 4.274 Noise is dealt with in paragraph 187 of the Framework, indicating that planning decisions should prevent new development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution.
- 4.275 Paragraph 198 of the Framework also states that planning decisions should 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, new development should mitigate and reduce to a minimum potential adverse impact resulting from noise and avoid noise giving rise to significant adverse impacts on health and the quality of life.
- 4.276 Policy SE06 of the Thanet District Council Local Plan sets out that proposals 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. Policy SE06 also requires that proposals which generate significant levels of noise must be accompanied by a scheme to mitigate such effect, bearing in mind the nature of surrounding areas.
- 4.277 The Noise and Vibration Impact Assessment (NVIA) submitted by the Home Office identifies noise sensitive receptors off-site in the surroundings, including residential properties to the east and residential/commercial areas to the north, west and southwest. A commercial use (RAF/spitfire museum) is also located to the south-east. On site, the NVIA identifies noise sensitive receptors include offices, accommodation, the temporary holding facilities and staff welfare areas.
- 4.278 The NVIA has been informed by short-term attended and long-term unattended (undertaken Tuesday 5<sup>th</sup> September to Thursday 7<sup>th</sup> September 2023) noise surveys. The surveys identify that sources of noise at the site include light and heavy vehicle flows from Manston Road (at the south-east and south-west of the site), ITPC operations, plant, pedestrian movements and intermittent construction noise. In addition, the long-term surveys identify that night-time background noise was likely dominated by on-site mechanical plant. The potential for future noise from additional road traffic associated with the proposed development and operational aircraft at Manston Airport is also noted in the NVIA.

- 4.279 Regarding the ITPC, the NVIA identifies that the marquees offer less sound protection than the proposed permanent buildings, with generators associated with the ITPC which may give rise to noise impacts.
- 4.280 On this basis the NVIA does not consider this would result in an adverse noise impact to users of the site, subject to good management during both daytime and at night to ensure internal ambient noise levels set by British Standards are achieved. Nevertheless, whilst the HO intend to replace generators with mains power supply, to avoid adverse temporary noise impacts and ensure that the Site is suitable for its current use, a planning condition is proposed that limits internal ambient noise levels in accordance with the recommendations of the NVIA.
- 4.281 As detailed matters relating to the modular units, temporary and permanent training facilities and MRC are not submitted, a separate planning condition is also proposed requiring the HO to prepare and submit an NVIA to the SSHCLG for their determination prior to commencing the relevant part of the development. This condition requires the NVIA to demonstrate there would be no adverse impact to staff and detained persons at the Site or neighbours from noise and vibration.
- 4.282 Regarding construction, the NVIA indicates that beyond 40m, no adverse noise impacts on residential uses are expected from construction activities – albeit for structural construction and demolition works, which indicates a distance of 45m and 75m, respectively, is required to residential properties to achieve the relevant noise criteria.
- 4.283 All existing noise sensitive receptors adjacent to the Site are >50m away. Works relating to demolition therefore have the potential to give rise to adverse effects given a building on the north-west boundary of the Site is proposed to be demolished. The proposal also has the potential to impact upon on Site sensitive receptors (detained persons, office workers, site operatives etc.) who could be in closer proximity to construction activities (than the indicative distances) where adverse noise impacts can occur. Similarly, the NVIA sets out that vibration levels from general construction are generally imperceptible at distances greater than around 20m from the source.
- 4.284 The NVIA recommends that a construction noise assessment based on project specific construction methodology should be undertaken as part of the detailed design stage. The more detailed assessment should cover areas such as working hours, programme and construction traffic. A condition to this effect, including an assessment of vibration, is recommended to be attached to the Decision Letter, requiring submission of a CEMP that secures appropriate measures to mitigate against any adverse noise impacts to neighbours and those on site, during the construction phase.
- 4.285 Regarding potential future aircraft noise at Manston Airport, the NVIA identifies the following:
- Daytime  $L_{Aeq,16hr}$  at maximum (airport) capacity, the predicted noise is above Lowest Observed Adverse Effect Level (LOAEL), but below Significant Observed Adverse Effect Level (SOAEL);
  - Nighttime  $L_{Aeq,8hr}$  at opening year and at maximum capacity, the predicted noise is above LOAEL, but below SOAEL; and
  - Nighttime  $L_{ASMAX}$  at maximum capacity, 2-4 events above the LOAEL.

- 4.286 The NVIA explains that LOAEL is the level above which adverse effects on health and quality of life can be detected, with SOAEL the level above which significant adverse effects on health and quality of life occur. Where there is an impact between LOAEL and SOAEL, there is a requirement to mitigate and minimise adverse effects on health and quality of life. The NVIA has reviewed the Noise Chapter of the Environmental Statement of the Manston Airport DCO and identifies that the development at Manston Airport is required to prepare and implement a Noise Mitigation Plan, in accordance with its DCO, to manage and control noise in a manner that provides local communities with certainty around the levels of noise that can be expected. Based on this review, the NVIA concludes no significant adverse effect is identified from future operational aircraft noise on the proposal Site.

### ***Conclusions on Noise***

- 4.287 We conclude that adverse impacts from noise during the construction and operation stages can be adequately mitigated to ensure an acceptable noise environment for staff and detained person and therefore there is no conflict with Policy SE06 of the Local Plan and relevant parts of Paragraphs 187 and 198 of the Framework.
- 4.288 A suitable condition is therefore suggested to be attached to the Decision Letter requiring submission and approval of a CEMP prior to commencement of development to minimise noise and vibration emissions during construction including the setting of limits, monitoring arrangements prescribed noise and vibration limits and measures for mitigation the impact of noise and vibration during the construction period.
- 4.289 In regard to operations, a condition is attached setting limits to operational noise; namely that internal ambient noise levels in all habitable rooms is no greater than 35 dB LAeq, 16 hour and sleeping accommodation does not exceed 30dB LAeq, 8 hour and 45dB L<sub>max</sub> more than ten times per night, assessed in accordance with British Standard BS 8233:2014. Internal ambient noise levels in offices shall also not exceed 45dB LAeq T and 35dB LAeq T for interview rooms, in accordance with BS 8233:2014.
- 4.290 A condition should also be attached to ensure that a detailed Noise and Vibration Impact Assessment is prepared and submitted for determination by the SSHCLG prior to commencement of the relevant part of future development at the site (i.e. modular buildings, training facilities and MRC) to be assessed in accordance with BS 8233: 2014.

## **11) Lighting**

- 4.291 Lighting is a material consideration. In planning terms, it is relevant to consider the effect of the proposed development, informed by the following.
- 4.292 Policy SE08 of the Thanet District Local Plan sets out that proposals which include the provision of new outdoor lighting or require specific lighting in connection with the operation of the proposed development will be permitted provided it can be demonstrated that; (1) the lighting has been designed to minimise light glare, light trespass, light spillage and sky glow, (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 landscape character areas, the wider countryside or those areas where dark skies are important part of the nocturnal landscape, (5) it does not have an adverse impact on long

distance views or from vantage points, and (6) where appropriate, mitigation measures are proposed.

- 4.293 In addition, Policy SE08 sets out that 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.
- 4.294 The general approach to lighting during construction is set out in the Outline CEMP submitted (Table 3-2) and indicates that lighting will be required in low-light conditions or after-dusk (during the winter months). Any temporary lighting required during the construction phase is likely to be limited given the working hours and seasons of implementation, but this can be managed by the CEMP, with the CEMP secured by planning condition.
- 4.295 Lichfields have paid particular regard to lighting in undertaking Site visits. Evening site visit observations on the 7 April 2025 confirmed that towards the north-east of the Site (near the existing car park) are a number of protruding floodlights. Due to their number and height, this existing lighting is visible from Woodchurch Road. We also note that in response to their online survey, the Home Office confirm in their Engagement Report submitted that comments have been received from neighbouring residents regarding the inability to block out site lighting at night.
- 4.296 Lighting is considered where it is a relevant consideration within the submitted technical assessments, notably the Outline CEMP, Ecological Appraisal Report and Ecological Impact Assessment. Within the detailed description of engineering works in the PPS submitted by the Home Office, the proposal confirms that retrospective permission is sought for the installation of additional lighting at the Site including lighting along boundary fences and to internal fenced zones. This lighting in particular has been installed to improve security at the Site. Additional lighting is proposed as part of the MRC including provision of concrete bases for lighting poles.
- 4.297 The Lighting Assessment submitted by the Home Office has taken an audit of the existing lighting arrangements on the Site. A walkover survey was conducted as part of the assessment which identifies new externally mounted LED flood lighting retrofitted to buildings to provide some illumination on Site roads and entrances to buildings, alongside LED luminaires around the perimeter of the ITPC marquees. No further details beyond an audit of lights are submitted. Notwithstanding new installations, the assessment concludes that much of the existing lighting (including on roads and walkways) remains non-functional or non-compliant with current standards and that the perimeter lighting is inadequate.
- 4.298 The assessment also identifies ecological receptors sensitive to light on Site including building KK1 for bat roosting and the area around the building as a dark corridor for bat travel. Long-eared owls also inhabit part of the site.
- 4.299 The Lighting Assessment concludes with a recommendation for a site-wide co-ordinated lighting strategy, including emergency lighting for safe emergency escape routes and bat-sensitive lighting plans, with details relating to full re-design and installation of a modern external lighting system which is fit for purpose. Lighting plans should be developed in consultation with an ecologist. The above requirements are proposed to be secured by

condition. As the ITPC is operational now a Lighting Strategy for approval by the SSHCLG is required within submission of 6 months, following the date of this decision, and prior to the installation of any further external lighting.

### ***Conclusion on Lighting***

- 4.300 Retrospective permission is sought for the installation of new lighting retrofitted to existing buildings, which has been installed to provide some illumination to building entrances and on Site roads. Lighting has also been installed around the perimeter of the ITPC marquees. Additional external lighting is proposed as part of the MRC requiring provision of concrete bases for lighting poles.
- 4.301 The Lighting Assessment submitted does not provide further technical details on lighting. As the ITPC is operational now a planning condition is proposed requiring submission of a Lighting Strategy within 6 months of the date of any decision to grant permission, and prior to the installation of any further external lighting. The use of appropriate conditions should ensure the proposal would comply with Policy SE08 of the Local Plan and Paragraph 198 of the Framework.

## **12) Air Quality**

- 4.302 Air quality is a material consideration. In planning terms, it is relevant to consider the effect of the proposed development on this, informed by the following.
- 4.303 Air quality is dealt with in paragraph 187 of the Framework, indicating that planning decisions should prevent new development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution.
- 4.304 Paragraph 199 of the Framework states that planning 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.
- 4.305 Policy SE05 of the Thanet Local Plan requires new development to ensure that users are not significantly affected by air quality and include mitigation measures where appropriate. Where development either individually or cumulatively is likely to have a detrimental impact on air quality, an Air Quality and/or Emissions Mitigation Assessment is required. The Air Quality Assessment should address cumulative effects of emissions and the Emission Mitigation Assessment should address proposed mitigation and offsetting measures that would prevent the National Air Quality Objectives being exceeded or reduce the extent of the air quality deterioration. Proposals that fail to demonstrate these will not be permitted.
- 4.306 Policy SE05 also states that major development should promote a shift to the use of sustainable low emission transport to minimise the impact of vehicle emissions on air quality. The Site is not located within an Air Quality Management Area (AQMA). However, coaches transporting detained persons from Dover to the Site will pass through the A20 AQMA in Dover (declared by Dover District Council).



- 4.307 A detailed Air Quality Assessment (“the AQA”) and Dover A20 AQMA Supplementary AQA (“the Dover AQA”) is submitted from the Home Office. The AQA and Dover AQA model impacts on air quality standards with reference to a range of relevant regulations, legislation, strategies, policies and guidance. The AQA and Dover AQA follow the non-statutory best practice guidance relating to air quality and development control published by Department for Environment, Food & Rural Affairs (Defra), Environmental Policy Implementation Community (EPIC) and the Institute of Air Quality Management (IAQM). The AQA identifies potential effects on air quality during the construction and operational phases of the ITPC and MRC (including the training facility). The AQA has also been informed by the TA, undertaken by BakerHicks. The Dover AQA assesses potential effects on air quality from the assumed 32 coaches (per day) that will transport detained persons from Dover Western Docks, passing through the Dover A20 AQMA, to Manston and is informed by road traffic data provided by the Department of Transport.
- 4.308 The AQA identifies a range of construction phase activities that 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. Mitigation measures have been identified (Appendix A.3) and a CEMP is suggested to manage air quality impacts. The CEMP, inclusive of a requirement for preparation of a Dust Management Plan and measures for mitigating such emissions to air, are proposed to be secured by condition.
- 4.309 Regarding operations, the AQA identifies that additional traffic in the form of staff vehicles, coaches and deliveries servicing the Site, will occur. The modelling undertaken in the AQA confirms that concentrations of air pollutants (NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub>) from the proposal at all modelled human health receptors can be described as negligible and as such recommends no specific air quality mitigation measures for the operational phase of the proposed development are required. However, in accordance with Thanet Air Quality Technical Planning Guidance, 10% of parking spaces on Site should be provided with Electric Vehicle charging points. This will be secured by planning condition. Notwithstanding the recommendations of the assessment, the AQA does identify that diesel operated generators are currently used to supply electricity to the ITPC and that use of these, and their associated emissions, may have the potential for short term effects on local air quality, including at nearby residential receptors.
- 4.310 The AQA confirms that an assessment of emissions from diesel generators in use at the temporary ITPC or proposed for retention as part of the MRC has not been undertaken (as no suitable information on these emissions sources has been made available to enable a quantitative assessment). The AQA however recognises that due to the transient nature of processing, detained persons are unlikely to be exposed to exceedances of the 1-hour NO<sub>2</sub> and 24-hr PM<sub>10</sub> AQS objectives during their time on Site. However, and by exception, some detained persons could remain on Site for a maximum period of 96 hours so that the Home Office are able to adequately assess their circumstances and confirm their identity. Those detained at the Site for 96 hours would be accommodated in Residential Holding Rooms, located in refurbished barrack blocks.
- 4.311 The HO however intends to replace generators with mains power supply and the AQA sets out that as of May 2025 there were eleven generators on site, with three of these anticipated for removal by June 2025 due to ongoing improvements in the power supply to the Site. The AQA explains that five temporary generators will remain on Site but are to be used as

an emergency backup supply in the event of a power failure as part of the MRC development. Given generators will not be used in perpetuity, with three already removed in June 2025, no further mitigation is proposed by planning condition.

- 4.312 In regard to the Dover A20 AQMA, and on the basis of [REDACTED] coach journeys ([REDACTED]), the Dover AQA also concludes from modelling that during the operational phases, whilst there will be additional traffic generated within the Dover A20 AQMA from these coach journeys on road traffic emissions on air quality can be considered not significant for human health receptors. No specific air quality mitigation measures are therefore required for the Dover AQMA.

### ***Response from Consultee***

- 4.313 Thanet District Council notes there are eleven diesel generators in use at the site with the aim of reducing this to five once improvements to on site power supply has been made and that these generators would be in use only as back up. The Council confirm that the use of generators on the Site is inconsistent with the Council's objective to improve air quality and reduce emissions. The move to permanent mains power connections is supported and understood to have been implemented. The Council recommend that backup generators shall not be used for routine power provision and only operate in the event of a mains power failure.

### ***Conclusion on Air Quality***

- 4.314 We conclude that the proposal would comply with Paragraphs 187 and 199 of the Framework and Policy SE05 of the Local Plan and would not result in any unacceptable effects in relation to air quality.

## **13) Climate Change**

- 4.315 The impact of climate change on development and its inhabitants or users is a material consideration.
- 4.316 Section 14 of the Framework provides guidance on meeting the challenge of climate change as well as related issues of flooding and coastal change. Paragraph 164 advises that new development should be planned in ways that avoid increased vulnerability to impacts arising from climate change. Risks should be managed through adaptation measures such as green infrastructure and sustainable drainage systems as well as helping to reduce greenhouse gas emissions through the location, orientation and design of buildings.
- 4.317 Paragraph 166 of the Framework advises that in determining planning applications, local planning authorities should expect new development to comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated that this is not feasible or viable.
- 4.318 Policy SP37 (Climate Change) of the Thanet Local Plan supports the Framework, requiring new development proposals to take account of the need to respond to climate change by minimising vulnerability and providing resilience to the impacts of climate change through use of technology, efficient design and siting and positioning of buildings; reducing emissions and energy demands; and reducing the impact of climate change on biodiversity by providing space for habitats and species to move through the landscape.

4.319 Other policies of the Local Plan are also relevant including CCO1 Fluvial and Tidal Flooding and CCO2 Surface Water Management and these are addressed fully within the Flood Risk Assessment submitted with the application and assessed under Main Consideration 8 above.

4.320 A Climate Change Resilience Assessment (CCRA) has been submitted in support of the application and updated in June 2025.

4.321 The CCRA was prepared using the Met Office's Climate Projections (UKCP) tool, using data from the Local Climate Model and Projections.

### ***Hazard Identification***

4.322 The CCRA identifies six hazard groups (increasing and extreme temperatures; precipitation and flooding; storms and high winds; drought; subsidence; and wildfire) and reviewed recent instances of relevant events in the county over the past 5 years and then looks at projections for these hazard groups over the period to 2080.

### ***Hazard Assessment***

4.323 Climate hazards have been identified with respect to the proposed development and ranked according to their likelihood of taking place as follows:

- 1 High Likelihood - High and extreme temperatures - impact on built structures and fabric; energy demands; health and wellbeing of users and staff; infrastructure services.
- 2 Medium Likelihood - Low temperatures - impact on built structures and fabric; energy demands; health and wellbeing of users and staff.
- 3 Medium Likelihood - Heavy rainfall/surface water flooding - impact on built structures and fabric; health and wellbeing of users and staff; infrastructure services; site access.
- 4 High Likelihood - Drought - impact on water quality and supply; infrastructure services; health and wellbeing of users and staff; landscape, habitats and recreation areas.
- 5 Medium Likelihood - Storms and High Winds - impact on built structures and fabric; health and wellbeing of users and staff; infrastructure services; site access.
- 6 Low Likelihood - Subsidence - impact on built structure and fabric; health and wellbeing of users and staff; infrastructure services.
- 7 High Likelihood - Wildfire - impact on built structure and fabric; health and wellbeing of users and staff; infrastructure services; site access.

4.324 A number of risk reduction measures are recommended at Table 5.1 of the CCRA however most of these are considered to be adequately addressed through the proposals and through anticipated conditions, for example those requiring SuDS and planting details. The CCRA recommends that building design is subject to a more onerous assessment in terms of its propensity to overheat and thereby adversely affect the most vulnerable detained persons and that additional measures may then need to be taken in design specifications to ensure the continued viability of the processing centre. These recommendations are drawn from a consideration of climate models and their predictions for the period between 2040 and

2070 and against an assumed design life of buildings of around 20 years (and so perhaps within the first 10 years of that period).

- 4.325 Having considered the risks associated with climate change and their timescales it is considered that there is not sufficient justification for attaching conditions requiring adherence to any more onerous design standards than are currently required through Building Regulations and other legislation. There is insufficient certainty to meet the six tests for application of planning conditions outlined in the Framework and we are also mindful that Building Regulations and other standards may change to account for the likely change in climate and associated risks over time and when development is subsequently proposed to renew or replace existing buildings then those changed standards and regulations may need to be applied.
- 4.326 Notwithstanding the above, the Energy and Sustainability statement submitted confirms that whilst the proposal will not meet BREEAM target 'Excellent' (in accordance with Ministry of Justice and HO policy requirements), design of proposals will be required to meet Building Regulation standard and maximise sustainability opportunities, where possible.

#### ***Response from Consultees***

- 4.327 The relevant comments from the EA regarding the modelling data to be used for surface water drainage have been noted in Main Consideration 8 above. There have been no further consultee comments regarding climate change matters.

#### ***Conclusion on Climate Change***

- 4.328 The risks arising from the identified hazard sources have been adequately defined within the CCRA. Whilst the CCRA discusses the potential to require further climate change risk reduction measures it is considered that existing regulations and standards provide sufficient protection and that there is insufficient justification to attach conditions requiring more onerous measures to be taken.
- 4.329 On this basis we are satisfied that the proposal is acceptable, complying with relevant parts of Paragraphs 164(a) and 166 of the Framework, Policy SP37 (Climate Change) of the Thanet Local Plan (2020).

## **14) Material Assets and Waste**

- 4.330 The management of waste and its impacts on the environment is a material consideration.
- 4.331 Minimising waste and pollution and the prudent use of natural resources is at the heart of the environmental objective within the definition of sustainable development at paragraph 8 of the Framework.
- 4.332 A suite of national legislation outside of the Planning Acts is also of relevance including the Environmental Protection Act 1990; Environment Act 1995; Waste and Emissions Trading Act 2003; Clean Neighbourhoods and Environment Act 2005; Waste (England and Wales) Regulations 2011; Environmental Permitting (England and Wales) Regulations 2016; and the Waste (Circular Economy) Regulations 2020.
- 4.333 The Kent Minerals and Waste Local Plan (Adopted March 2025) sets out the strategy for waste management in the county to the year 2039. Strategic Objective 11 of the Plan seeks

to minimise the production of waste and increase its reuse; promote the management of waste close to the source of production.

- 4.334 The submitted Operational Waste Management Strategy (OWMS) considers the nature of and estimated quantities of waste and recycling, as well as the waste and recycling storage and management arrangements prior to collection. The OWMS has been updated during determination to provide further detail on waste calculations and related storage provision.

### ***Waste Generation***

- 4.335 The OWMS assumptions for waste generated from both existing and future staff and detained person meal consumption are reportedly based on experience from other projects and data provided by the design time. On that basis they are only estimates and should be treated as such, however they are grounded in reasonable assumptions and application of British Standard indices.
- 4.336 The overall waste generation estimate in the existing and future scenarios is 193 m<sup>3</sup> per week as they are calculated using the same number of staff and detained persons in both scenarios. The waste estimates comprise cardboard, mixed recycling, food and residual waste. These estimates inform the storage requirements and design, including separate receptacles/space for other waste such as medical waste.

### ***Design Considerations***

- 4.337 The OWMS recommends baling of cardboard, a 10.5m<sup>3</sup> skip container for mixed recycling, 15no. wheelie bins (140 litre) for food, and a 9.5m<sup>3</sup> skip portable compactor for residual waste. The OWMS states that facilities management staff will transfer waste and recycling to the storage areas, and an appointed waste contractor will be responsible for collection (a mix of daily and weekly collections), and returning receptacles to their relevant areas.
- 4.338 In seeking to ensure that the amenity of detained persons and staff will be protected from odour, a planning condition is recommended requiring details confirming the locations for operational waste storage, prior to its presentation for collection

### ***Conclusion on Material Assets and Waste***

- 4.339 The overarching principles are considered appropriate, however the final details of operational waste storage should be secured by a planning condition.

## ***Social Considerations***

### **15) Health and Wellbeing of Existing Community**

- 4.340 In planning terms, it is relevant to consider the effect of the proposed development on the health and wellbeing of existing communities.

#### ***Healthcare***

- 4.341 As part of achieving sustainable development, Framework Paragraphs 96 and 135 (f) support healthy, inclusive and safe places so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion.

- 4.342 Policy SP38 of the Local Plan seeks to protect and improve the health of Thanet's residents and reduce health inequalities. Policy SP38 will support proposals that bring forward accessible community services and facilities, including new health facilities and safeguard existing community services and facilities.
- 4.343 In this section of the report, we consider the extent to which the proposed development, including healthcare needs of detained persons, will have an impact on availability and service level of healthcare for the wider population.
- 4.344 The Human Health Impact Assessment [HHIA] submitted to accompany the proposals states that the availability of data on past asylum seekers is limited by the information recorded or by confidentiality. Recorded information on the numbers or proportions of current individuals who have a current underlying health condition or disability is also limited.
- 4.345 A health needs assessment of small boat arrivals was carried out on behalf of the Home Office between September and December 2023 to ensure health requirements and any support was understood. Trauma related conditions of asylum seekers arriving by small boat were mainly as a result of fuel burns, crush injuries, ankle injuries and shoulder dislocations. The main medical conditions of persons arriving by small boat were uncontrolled diabetes, uncontrolled epilepsy, uncontrolled angina, hypothermia and hyperthermia, as well as individuals without necessary medication. Referrals to the Home Office's Safeguarding Hub are recorded and, of those received, the highest number were for mental health issues (post traumatic stress disorder (PTSD)).
- 4.346 The British Medical Association state that refugees and asylum seekers can have complex health needs, potentially including untreated communicable diseases, chronic conditions, maternity care and mental health needs. These needs could place increased demands on local healthcare services and may require specialist provision if they cannot be treated onsite.
- 4.347 There may be a fear amongst some of the local community of harmful effects on health arising from communicable and infectious disease. Service users are screened for common infectious disease upon arrival. Procedures are in place for managing infectious diseases, including isolation. On that basis there are precautions in place that address concerns of the spread of an infectious disease in the local community. Healthcare staff should discharge their service diligently and this messaging should be communicated to the local community via usual public channels.
- 4.348 In the event of infectious disease being identified, the Site had capacity for up to 14 detained persons to be isolated in Garrick pods (ordinarily operated as one pod per user but expandable if two users had displayed the same symptoms). A 12 room (bed) medical isolation facility is reported to have opened to replace the Garrick pods. The Planning Proposal Statement reports that between 15 June 2023 until 18 August 2024 the maximum number of isolation beds used was seven, on two occasions. If additional facilities were required due to an outbreak, then existing marquees or residential holding rooms could be used. Based on recent data the Site is considered to have sufficient capacity to respond to infectious disease incidences without relying on external healthcare facilities.

- 4.349 As part of the consultation and engagement process NHS Kent and Medway ICB responded to the applicants online survey as follows:
- “During the summer of 2022 the local NHS noticed a spike in 999 calls, Emergency Department and Urgent Treatment Centre attendances from the Manston Site and Western Jet Foil. The enhanced on site medical facilities at the Manston Site and Western Jet Foil that were implemented following the pressures experienced in the Summer of 2022 have been successful in reducing the number of 999 calls and attendances at already busy local Emergency Departments and Urgent Care Centres...*
- The continuation of an enhanced level of medical provision as part of the proposed development will be an important factor in the continued mitigation of the sites impact on local NHS services...”.*
- 4.350 A Healthcare Position Statement [HPS] is included at Appendix 3 of the Planning Proposal Statement. It contains data on medical staffing, hospital transfers, outbreak control plan details, isolation facilities, as well as reference to an NHS Health Needs Assessment for Small Boat Arrivals and a Supportive Health Care Review which were both carried out in 2024
- 4.351 The HPS confirms that emergency doctors and paramedics are available 24 hours a day, 7 days a week, with ability to provide urgent and emergency Primary Care level services, as well as dispense medication. Any medication that is not held on site is sourced from local pharmacies. This on-site medical provision will mitigate the majority of impacts on local community healthcare availability and mitigate impact on the emergency services. The demand for detained person health provision will be monitored, with provision increased, if required, to ensure there are no significant effects upon local healthcare infrastructure.
- 4.352 In some instances, detained persons require non-emergency transfers or ‘blue light’ emergency transfers to off-site medical facilities such as the Queen Elizabeth, Queen Mother and William Harvey Hospitals in Margate and Ashford respectively, or other local non-emergency treatment centres. Data provided between January 2024 and May 2025 shows a peak of 32 monthly non-emergency transfers with an average of 16, and a peak of 10 ‘blue light’ transfers with an average of 3. In addition, detained persons may require further onward medication and care in the location of dispersal accommodation which relies on local healthcare services.
- 4.353 Whilst these hospital referral numbers may be considered low in the context of the overall number of patients treated at local health centres, it still generates an impact on NHS resources and therefore the ability to meet the healthcare needs of the local community, as well as the availability of medication at local pharmacies. These are negative, albeit limited impacts, which conflict with Policy SP38, however this should be afforded limited weight.
- 4.354 NHS England has been working closely with the Home Office Border Force team to support in an advisory role the procurement of a single provider of healthcare services at Western Jet Foil and Manston. A liaison post for health has been agreed to formalise NHS advice and support to the Home Office for this service. This post is intended to ensure that the healthcare provider works closely with Kent and Medway ICB and their local providers to agree pathways of care within the area and for onward journeys, in an effort to maintain a limited impact on local health services provision in the local area.

- 4.355 Displaced impacts on healthcare services across the country occur once detained persons have continued their onward journey. This is a wider impact that the Government is working with NHS England to mitigate and is not something that should be addressed by the Manston Reception Centre itself.

In terms of potential indirect impacts on the local community, the construction process will involve the use of vehicles to transport plant and materials to and from the Site, which will have a temporary impact on the transport network and potentially slow down journey times down and/or delay access to healthcare services for the local community. This can be partly mitigated through construction logistics management, secured through an appropriate Construction Traffic Management Plan. Similarly, staff and operational traffic will generate impacts on the local transport network too, which is car dependent in this location. The increase in traffic, as a result of operation of the proposed facilities, also has the potential to slow down journey times and/or cause delays, which would have a permanent adverse impact on local residents through changes to accessibility and connectivity to healthcare services. This can be partly mitigated through implementation of a Travel Plan and related sustainable travel measures.

***Use of local facilities***

- 4.356 Recreational facilities, including indoor and outdoor facilities are provided on site. Indoor facilities include books, board games and TVs. The outdoor facilities are contained and secure given the detained nature of individuals. This level of provision is considered appropriate for the scale and nature of development, particularly given detained persons are detained and only usually expected to be at the site for up to 24 hours.
- 4.357 The Manston Reception Centre is a secure facility and detained persons would not be permitted to leave the Site. On that basis, there will be no impact on local community access to recreational facilities which provide health and wellbeing benefits.

***Crime and fear of crime***

- 4.358 Public safety is a material consideration in planning decisions – paragraphs 96 and 135 of the Framework state that decisions should aim to achieve healthy, inclusive and safe places so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion. Paragraph 102 of the Framework goes on to state that planning decisions should promote public safety and take into account wider security and defence requirements by anticipating and addressing possible malicious threats and natural hazards, especially in areas where large numbers of people are expected to congregate, as well as recognising and supporting development required for operational defence and security purposes.
- 4.359 As this is a detained site, there should be no need for detained person crime prevention external to the site. 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 extensive existing and proposed CCTV across the site which uses [REDACTED], with coverage [REDACTED], and upgraded external perimeter lighting. [REDACTED]



██████ The risks and mitigation for potential protests are addressed under Major Accident Risk (below). External policing is a matter for the Chief Constable and the level of policing provision will be managed and decided by Kent Police, however the submitted Engagement Report confirms that the Home Office has been, and continues to be, in regular dialogue with Kent Policy to address any issues at the Site appropriately.

- 4.360 Negative publicity about the MRC by protest groups and in the media may heighten concerns amongst the existing local population. There have been protests at hotels and there has been national media coverage of protests elsewhere in the UK, including violence and damage to property. As a result of these fears there could be an adverse effect on mental wellbeing for the existing community.
- 4.361 However, as it is a detained site the fear of crime in the local community should be low – the status of the site should therefore be regularly communicated by the Home Office via its established lines of public communication between the local police officers, fire services, Home Office officials and other service providers.
- 4.362 On the basis that security and policing of the Site and its immediate environs are a matter for the Home Office to continue to manage in consultation with Kent Police, we are satisfied that the proposals include appropriate measures to address paragraphs 96 and 135 (f) of the Framework and Policy QDO2 of the Thanet Local Plan in respect of crime and public safety.

### ***Conclusion on Health and Wellbeing of Existing Community***

- 4.363 We conclude that the proposals referred to in the Planning Proposal Statement, Health Impact Assessment and Healthcare Position Statement will make appropriate provision for the primary and emergency healthcare needs of detained persons during the duration that they are usually expected to be at the Site. NHS England is engaged proactively with the Home Office to address immediate healthcare needs on arrival at Western Jet Foil, a pathway of care to Manston which has its own dedicated on-site healthcare, and for onward journey. On that basis, and as evidenced by data, referral of detained persons for specialist off-site healthcare is expected to be uncommon. As such, the proposal is expected to have a limited impact on existing health services.
- 4.364 In terms of access to recreational facilities which support wellbeing of the local community, as well as crime and fear of crime, this is fully mitigated by the fact this is a detained site and therefore detained persons will not access local community facilities. The Home Office will continue to work alongside Kent Police to manage security and risk of crime.
- 4.365 Suitable conditions should secure details of construction traffic management and operational travel plan to mitigate transport impacts of the proposal, which may otherwise slow journey times or delay local residents accessing local facilities including healthcare, or emergency services responding in the community.

## **16) Residential Amenity**

- 4.366 Paragraph 135 (f) of the Framework seeks to ensure that planning decisions 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. Local Plan Policy QDO3 also states that all new development should 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.

- 4.367      There are residents living nearby, mainly located west of Manston Road off Esmonde Drive, Mannock Drive and Bell Davies Drive, but also a small number to the northwest situated on the east side of Manston Road itself, including Pampered Pooches, and to the northeast situated at the southern end of Queendown Road. Holmcroft, within the Site on the east side of Manston Road, is the former Commandant's house but it has been vacant since Home Office occupation of the site.
  
- 4.368      Most of the housing near to the Site is not new and was in place when it was an active RAF base and military training facility, the exceptions being some newer houses off Mannock Drive which were first occupied around 2017-2019, and those to the northwest on the east side of Manston Road where there are c.6 new detached houses.
  
- 4.369      At their nearest point some of these properties are approximately 25-30m from the Site perimeter, however buildings within the Site are generally setback from its perimeter. All residential properties are separated from the Site by mature and dense tree cover and foliage, thus are considered well screened. There is a change in level from the residential properties to the west of Manston Road which are on slightly higher ground, compared to the Site itself on the eastern side of Manston Road. Operational development is capped at 6m height to the western edge of the site. Given the existing natural screening on the Site boundaries (which is proposed for retention, as report by the Arboricultural Impact Assessment), the existing and proposed development is not expected to give rise to any visual amenity concerns due to its built form.
  
- 4.370      None of the neighbouring residential properties are within close proximity to the main site access on its southern Manston Road perimeter, nor the two existing secondary access points being considered for construction traffic. There is an emergency access point on Manston Road which is nearer residential properties to the west and northwest of the Site, however this is not expected to be used regularly and will not generate amenity impact concerns.

### **Construction Impacts**

- 4.371      The application documentation includes an Outline Construction Environmental Management Plan (OCEMP) and an Outline Construction Traffic Management Plan (OCTMP).
  
- 4.372      The OCEMP acknowledges that there are residential uses around the site. It envisages the principal contractor registering for the Considerate Constructors Scheme, commits to devising a plan for monitoring and mitigating dust emissions through a Dust Management Plan, to minimise construction noise and vibration by completing a full Construction Noise and Vibration Assessment to take account of plant choice, construction techniques and potential adverse effects on sensitive receptors.
  
- 4.373      The submitted Air Quality Assessment contains construction dust mitigation measures at Appendix 3, and the Noise and Vibration Impact Assessment contains an indicative list of activities, sound levels and distances to achieve noise criteria at nearby sensitive receptors, on and off site. It also assesses increases in noise from construction traffic, concluding that this temporary effect will not be adverse as levels will remain below the assessment criteria.

In terms of lighting it states that construction will generally be within daylight hours but mitigation techniques can be employed for winter and out of hours working where necessary.

4.374 The aforementioned details should all be included in a final CEMP secured by planning condition, together with details of emissions from construction plant, generators and construction traffic which could temporarily affect local air quality as well as a commitment to the Considerate Constructors Scheme. It is noted that potential impacts on neighbouring residential amenity, arising from construction, are temporary.

4.375 The OCTMP proposes to route construction traffic via Spitfire Way (B2190) onto Manston Road, to the south of the Site. This routing suggests there will be no direct amenity impacts on residents surrounding the Site, except potentially those occupying homes on Bell Davies Drive nearest Spitfire Way, for example due to increased HGV movements in close proximity to windows or gardens. The stretch of Spitfire Way adjacent to Bell Davies Drive is 30mph speed limited. Spitfire Way is an important arterial route through the area enabling access to the Site, airport and other commercial businesses. It is therefore well trafficked already by larger commercial vehicles and residents occupying properties in Bell Davies Drive will be used to the traffic activity and associated noise. Construction traffic will have a negative impact but will be temporary during the period of construction. A final CTMP should be secured by planning condition, including travel plan commitments for construction employees.

### **Operational Impacts**

4.376 It is relevant to consider potential operational impacts on residential amenity, namely noise emanating from traffic, plant, generators and on-site operations, air quality impacts from traffic and plant emissions, as well as building and perimeter fence lighting and potentially odour due to an on-site foul water treatment station which is proposed as an interim measure until Southern Water upgrades to infrastructure are completed off-site.

4.377 In terms of noise, detailed specifications for proposed mechanical plant required to support the operation of the Site are not yet known. Sound levels for on-site generators are provided and it is confirmed that they are predicted to be below background levels at noise sensitive receptors. It is considered unlikely that on-site mechanical plant will adversely impact neighbouring residential amenity, however, the need for attenuation or mitigation to achieve criteria set out in the submitted Noise and Vibration Impact Assessment is to be secured by planning condition. This should include specifying the mechanical plant and designing in mitigation to ensure no adverse impacts on detained persons within the Site during the hours of 23:00-07:00 daily, as well as specific levels to be complied with when calculated at the Site boundary to ensure no adverse impacts on the existing off-site sensitive receptors.

4.378 Some level of noise arising from increased levels of operational traffic is unavoidable, however it is considered unlikely to result in adverse effects on nearby sensitive receptors. However, efforts can be made to minimise noise from operational traffic through the final Travel Plan which will be subject to condition. This could include, for example, car sharing for staff and visitors to reduce overall journey numbers, discouraging use of horns or parking warning noises where safe to do so, or encouraging use of electric vehicles which have a lower acoustic output profile.

- 4.379 The application documentation explains how the Site lighting infrastructure was installed in the late 1990s and is life expired. The HO has retrofitted lights to existing buildings and the perimeter, however it is reported that the perimeter lighting is inadequate. The submitted Lighting Assessment makes a number of recommendations for a future lighting proposal. This is secured by planning condition to ensure that a comprehensive lighting strategy, both to the perimeter and within the Site, is designed to ensure it meets relevant standards and provides for safe operations, but does not result in harm to amenity of residents occupying properties surrounding the Site, nor local ecology.
- 4.380 The Site and surrounding residential receptors are not located within or adjacent to an Air Quality Management Area. The submitted Air Quality Assessment includes Defra data and diffusion monitoring which confirm background concentrations of pollutants are below relevant national air quality targets. A detailed air quality assessment for the operational phase of the proposal was carried out using dispersion modelling. Modelled concentrations of NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> were shown to be below relevant objectives and PM<sub>2.5</sub> targets at all receptors. The impact of changes in concentrations as a result of the operation of the proposal are therefore expected to be negligible.
- 4.381 In terms of odour, the Drainage Feasibility Report states that to facilitate the construction of the temporary wastewater treatment plant, a detailed design will be required including a recycled ventilation system, chemical treatment and biological process for the management of waste and odour. Consultation with the Environment Agency will also be required to agree an assessment of the frequency of measurement and regulation of the odour produced from the wastewater treatment and any associated environmental permit requirements. To mitigate against the potential amenity impact of odour on nearby sensitive receptors, details of the final foul water treatment plant and strategy to manage odour should be secured by condition.

### ***Conclusion on Residential Amenity***

- 4.382 The site was in active operational use by the RAF for a number of years which may have given rise to small degrees of disturbance in terms of traffic, noise, lighting, air quality and potentially odour. In conclusion, whilst new sensitive receptors have been introduced in proximity to the Site boundary, the site's historical use is relevant to the expectation of preserving local resident amenity.
- 4.383 The construction of the development will invariably generate some temporary environmental effects that could impact nearby sensitive receptors, however, these should be capable of mitigation through robust management plans, secured by planning condition.
- 4.384 The potential operational impacts of the completed development will be similar, ranging from traffic to noise, lighting, air quality and odour, however all of these aspects can be suitably managed through robust on-site practices, again, secured by planning conditions.

## **17) Major Accident Risk**

- 4.385 The safety of the detained persons, staff and local community in relation to major accident risk is a material consideration. The following considerations have been taken into account.

### ***Fire Safety***

- 4.386 The Home Office has confirmed through clarification responses that all aviation fuel and ammunition has been removed from the site as part of the closure of the air force base.
- 4.387 The Home Office has advised that the accommodation provided will comply with Building Regulations 2010, Regulatory Reform (Fire Safety) Order 2005 and Electricity at Work Regulations 1989. There are no existing or proposed high risk buildings on the Site based on the Building Safety Act 2022 definition.
- 4.388 The Site will have 24-hour on-site security, including CCTV. The Home Office has advised that the Site has a fire risk management strategy which sets out a procedure for when staff may find a fire. Fire safety systems and equipment are employed to both detect fires, and all sleeping areas have full advance fire detection systems, and manual call points in the marquee areas. All temporary and permanent buildings have had individual Fire Risk Assessments completed, training is provided to Fire Marshals and employees, and annual drills are carried out in conjunction with Kent Fire and Rescue (who also visit weekly for site walkovers with Border Force staff).
- 4.389 Generators are located on Site to supply electricity to temporary structures - [REDACTED] [REDACTED] The re-fuelling and maintenance of these generators is undertaken by a HO contractor and the storage tanks are stated as compliant with relevant regulations. On the basis that they are secure and there are measures to deal with any unexpected incidents such as a fuel spill the risk of accident or fire arising is considered low.
- 4.390 In light of the above, the risk of fire is considered limited.
- Unexploded Ordnance (UXO)***
- 4.391 The Home Office has included as part of its submission to MHCLG a UXB Clearance Survey 2025), which covers a large proportion of the site and is informed by surveys conducted in phases between August 2023 and November 2024. Also submitted is a Detailed Unexploded Ordnance Risk Assessment which covers two small parcels of the site – the first is a grassed area referred to as a football pitch (which was also covered in the UXB Clearance Survey), and the second is an area of hardstanding used for vehicle parking.
- 4.392 The 2024 Risk Assessment states that, in respect of the football pitch area and the area of hardstanding use for vehicle parking, there is an overall medium to high risk from German and anti-aircraft unexploded ordnance, and a low to medium risk from Allied unexploded ordnance. In terms of mitigation, it recommends a UXO Risk Management Plan, site specific UXO awareness briefings to all personnel conducting intrusive works, on-site support from a qualified UXO specialist during open excavations, and an intrusive magnetometer survey of all borehole and pile locations to maximum bomb penetration depths. The ‘football pitch’ area has already been subject to intrusive investigation as part of the UXB Clearance Survey (see below), however the area of hardstanding used for vehicle parking has not and therefore would need to be subject to further investigation or mitigation should it be proposed for excavation.
- 4.393 The 2025 UXB Clearance Survey comprised a magnometer survey followed by intrusive investigations. Where survey and clearance has taken place the hazard level is reported as ‘low’, thus excavation can proceed to a maximum depth of 0.9m (180 potential targets were investigated). Where targets were inaccessible for investigation, it is recommended that

excavations are supervised by a qualified engineer (14 targets not investigated due to utilities and depth).

- 4.394 The Clearance Survey does not include the full extent of the Site, and therefore where development is proposed on areas that have not been surveyed and investigated it is recommended that further survey work is carried out, and supervision provided if excavation is required. This should be secured by planning condition.
- 4.395 Notwithstanding the submitted risk assessment and survey, it is acknowledged that the Home Office has been using the site without UXO incident for a number of years. Verification certificates of the previously surveyed and investigated areas should be submitted to the Secretary of State before any further development is carried out, and a planning condition is attached that requires survey and certification of other areas of the Site prior to excavation or breaking ground, together with a response plan and protocol for the discovered of any unexpected ordnance.
- 4.396 In conjunction with the aforementioned UXO condition, the CEMP, to be secured by condition, should include provisions for good practice by construction contractors to keep site users safe from UXO risk.
- 4.397 In conclusion, the potential impact of an accident from an unexploded ordnance would be high but the risk of encountering such unexploded ordnance is considered low having regard to the survey, investigation and risk assessment worked carried out to date.
- 4.398 A condition is proposed to ensure all areas of the site proposed for development are suitably surveyed, investigated and works monitored by a specialist engineer, with certification provided thereafter. The condition also requires a comprehensive response plan relating to unexploded ordnance to be maintained.

### ***Radiation***

- 4.399 Radiological surveys completed in 2022 and 2024 identified radioactivity at the Site associated with the historical Site uses. Remediation was undertaken between 28 and 31 October 2024 and the cause of elevated radiation measurements were removed under controlled conditions and transferred to a secure waste store pending disposal. The waste material was removed from the Site by the Home Office on 3 March 2025. The report refers to 13 areas of investigation but only 7 areas that have been remediated. As a result, to ensure the safety of detained persons and staff, access to the remaining 6 areas should be restricted by planning condition, on the understanding that it is not proposed to be investigated or remediated.

### ***Protests***

- 4.400 As the proposed use of the Site may give rise to strong views about immigration policy and detained persons, and the use of the Site for this has received media coverage, it may be the focus for demonstrations and protests. There are at least three groups who could protest against the development. These are a) anti-immigration protestors, b) local residents or others opposed to the use of this Site, or others like it, for asylum seeker accommodation, and c) pro-asylum groups against proposed accommodation conditions and operational practices. There may also be others who are generally supportive of asylum seekers.

Protests and demonstrations could give rise to a greater risk of accidents to detained persons, those participating in such activities, local residents, security staff, and the police.

- 4.401 The Home Office has confirmed that security forms an integral part of the proposed development. In its engagement report, the Home Office states that it has engaged with local police and will continue to do so to minimise any associated risks.
- 4.402 The Site is fenced and gated, with access controlled through a gatehouse at the entry point. It has 24-hour on-site security, which would prevent unauthorised persons from entering, in the interests of the safety of the detained persons, staff and local community. The accommodation has previously been used to accommodate military personnel, with associated secure design provision. Given the above combination of factors, it is unlikely that protestors would be able to gain unlawful entry to the Site during operation.
- 4.403 As the proposed development is a secure site for detained persons, detained persons will not be able to enter or leave the site unaccompanied or on foot and the risk of accidents and injury to persons as a result of external protests and demonstrations will be limited.
- 4.404 There is a risk, albeit limited, of accidents arising from internal protests, riots and fires being started on site by detained persons. These events are not considered to be frequent and should be addressed by competent site operations. The Planning Proposal Statement confirms that to date, the onsite Home Office team have managed previous protests successfully with the need of limited police support. It goes on to state that Kent Police have not voiced any concerns in relation to protests at the site, and Kent Police and the Manston Estates Team have identified a designated protest area should it be required (Manston Road/Spitfire Way Junction).
- 4.405 Overall, the risk of accidents and injury to persons as a result of protests and demonstrations will be limited in magnitude and spatial extent and infrequent for the period of operation, however we expect the Home Office, on-site estate team and Kent Police to continue to liaise and monitor this risk for the duration of the development lifespan.

### ***Glint and Glare***

- 4.406 A maximum area of 7,750 sq. m of rooftop solar panels is proposed which has potential to reflect light off solar panel surfaces. The potential effects of reflectivity are glint (a momentary flash of bright light) and glare (a continuous source of bright light) which can cause a brief loss of vision (flash blindness). This is of particular concern to pilots operating aircraft at Manston Airport adjacent who require, clear, unobstructed vision. Additionally, glare can lead pilots to confuse reflections with aeronautical lights<sup>12</sup>.
- 4.407 The location of the proposed solar panels is not identified by the SSHD within the plans submitted. The amount of light reflected off a solar panel surface depends on the amount of sunlight hitting the surface, its surface reflectivity, geographic location, time of year, cloud cover and solar panel orientation.
- 4.408 To ensure the proposed solar panels do not present a hazard to the safety of aircraft, a planning condition is recommended to be attached to the Decision Letter, requiring the

---

<sup>12</sup> Federal Aviation Administration: Technical Guidance for Evaluating Selected Solar Technologies on Airports (2018), as cited in [Solar Photovoltaic and Building Development Glint and Glare Guidance \(2022\)](#).

SSHD to undertake a glint and glare assessment prior to the installation of any rooftop solar photovoltaic panels approved.

***Conclusion on major accident risk***

- 4.409 The risk of major accidents arising from the hazard sources identified above are of limited probability and limited duration. With appropriate mitigation secured by condition in respect of UXO, CEMP and glint and glare assessment, it is envisaged that the risk of accidents during construction and operational phases will be low. The protest risk will need to be continually managed by the Home Office, on-site estate team and through liaison with Kent Police, as considered appropriate. For the reasons set out above, 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.

***Economic Considerations***

**18) Employment and Local Economy**

- 4.410 Employment and the local economy are material considerations. In planning terms, it is relevant to consider the effect of the proposed development on these topics.
- 4.411 The purpose of the planning system is to contribute to sustainable development. One of the three key objectives focuses on the economy. Framework paragraph 8 includes an economic objective to help build a strong, responsive and competitive economy.
- 4.412 The Socio-Economic Impact Statement submitted to accompany the proposal states that the capital construction costs are estimated at over £84 million. During the construction phase, estimated to be two years, it is estimated to support 1,100 gross construction job years and £44 million net additional construction employment GVA impacts.
- 4.413 The Socio-Economic Impact Statement submitted to accompany the proposal does not provide employment data for the existing temporary initial triage and processing centre generates. However, for the permanent processing facility it estimates it will generate 1,055 staff (gross direct FTE). In addition, a training facility forms part of the proposal which will accommodate a further 144 (FTE) trainees who will go on to be employed at Manston and elsewhere. Overall, this could equate to up to 800 net additional jobs in Thanet. The proposal also includes provision for Temporary Staff Training facilities, notably for Escorting staff. The temporary facility would be able to accommodate up to 100 trainee students at any one time. Similar facilities require a range of roles which include but are not limited to management positions, site managers, health and welfare staff, drivers, maintenance operatives, office administrators, security, catering and kitchen staff, and cleaning staff.
- 4.414 The Home Office and their suppliers are responsible for the recruitment of staff and suppliers. In accordance with relevant legislation the recruitment strategy for the proposal will be expected to encourage applicants from different cultures and backgrounds, reflecting the local Manston and Kent communities and a diverse range of advertising techniques will be used to achieve this. In the case of suppliers, where possible and cost effective to do so, the Home Office advise that contractor services will be sourced from as close to the Site as possible.



- 4.415 Through the provision of a significant number of suitable and local employment opportunities, this could result in new entrants to the labour market with a reduced dependency on the benefits system and increased income tax and national insurance contributions, thus creating fiscal benefits to the Government. Asylum seekers who are granted leave to remain will also potentially become new entrants to the labour market, thus contributing to the economic output of the country.
- 4.416 The Socio-Economic Impact Statement estimates the proposal will support up to £480 million of discounted net additional GVA benefit to the Thanet economy over a 10 year period, and around c.£1m of business rates per annum for the local authority.
- 4.417 In summary, both the construction and operational phases of the development will result in benefits to the economy in terms of employment and expenditure.
- 4.418 The construction employment and associated construction supply chain effects, the operational employment and operational supply chain effects, and the further training opportunities are all benefits of the proposal.

***Conclusion on employment and local economy***

- 4.419 The Socio-Economic Assessment concludes that the proposed development could align with and support a number of national 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 proposed development supports economic growth in the local area in compliance with the NPPF, specifically paragraph 85 is considered to bring significant economic benefits to the local area, whilst also complying with Policy SP24 of the Thanet Local Plan.

## 5.0 Conditions

- 5.1 The following types of planning condition are suggested, with their inclusion on any decision to grant planning permission forming part of the basis for the recommendation below. These have been considered against the tests of the Framework, advice provided by Planning Practice Guidance and recommendations from consultees. All are considered to meet the relevant tests, including that they are reasonable and necessary in the circumstances of this case. A condition requiring the development to be begun no later than two years from the date of this decision is proposed (draft Condition 1), reflecting the urgent nature of this Crown Development. The proposal has also been considered on the basis of 1,600 detained persons accommodated on the Site at any one time and a condition is required to limit the numbers on site accordingly (draft Condition 2).
- 5.2 A condition is required to control the maximum development parameters covering height of buildings, structures and fencing and the maximum floorspace, necessary to safeguard environmental character and to ensure an acceptable form of development (draft Condition 3). Conditions requiring the development be carried out in accordance with the approved documents and the phases in which development is proposed to come forward are also necessary to ensure an acceptable form of development (draft Conditions 4 and 5). As temporary development is sought (training facilities and modular units) details of reinstatement are required in the interest of the environment (draft Condition 6).
- 5.3 To mitigate against adverse highways impact during operations, conditions are required for appropriate junction improvements (a roundabout) at the Manston Road/B2050/Spitfire Way Junction, details of access signage, Travel Plan, Car Park Management Plan and a limit of on-site parking spaces (draft Conditions 8-12). A condition requiring a Construction Travel Management Plan is necessary to mitigate highway impacts during construction (draft Condition 7).
- 5.4 To ensure works in contaminated areas do not present a risk to groundwater within the underlying aquifer and potential sources of contamination associated with the historical use of the Site, conditions relating to pollution control measures are required. This includes conditions for ground investigation and risk assessment (draft Condition 13), remediation (draft Condition 14 and 15), radiation remediation (draft Condition 16), materials management (draft Condition 17) and UXO (draft Condition 18).
- 5.5 In the interests of the historic environment, a condition is required to undertake a Historic Building Record including of any below-ground remains of the residents' huts (draft Condition 19).
- 5.6 Conditions are required for the SSHD to submit plans of proposed development to ensure an acceptable form of development, including material details in the interest of high-quality design (draft Condition 20).
- 5.7 Conditions are required to protect the environment in relation to flood risk, (including defined finished floor levels), drainage and foul water (draft Conditions 21 and 22), foul water (draft Condition 23), ecology surveys (draft Conditions 24) and for tree protection (draft Condition 25).

- 5.8 For the same reasons, a Construction Environmental Management Plan (CEMP) is required (draft Condition 28). Details of CEMP procedures are required for determination prior to any vegetation clearance, demolition, extension or conversion of buildings including, but not limited to, a Dust Management Plan, Stakeholder Communication Plan, Construction Noise and Vibration Assessment, management of surface water, soil handling, material storage, assessment and prevention of contamination.
  
- 5.9 MHCLG consider a separate condition relating to construction stage biodiversity management, including a Precautionary Working Method Statement, is required to ensure there are measures for the protection of ecology and supervision of arboriculture/ecological matters by a suitably qualified person during construction (draft Condition 27). This includes a requirement to identify ecological constraints and measures to protect and enhance the natural environment. Should the SSHD require development within the location of the area containing Basil Thyme (listed as vulnerable on the Great Britain and England Red list), a Translocation Method Statement is required as part of the CEMP – Biodiversity. A Landscape and Ecological Management Plan is required in the interests of securing long term ecological and environmental protection. This includes details of ecological designs for screening of the development, planting schemes, habitat compensation and monitoring (draft Condition 29).
  
- 5.10 Conditions relating to noise and vibration (draft Conditions 31), lighting (draft Condition 32), operational waste storage (draft Condition 33), details of the temporary foul treatment plant (draft Conditions 34) are required for environmental protection and in the interests of residential amenity.
  
- 5.11 To ensure pilots operating at Manston Airport are not impacted by glint and glare of solar panels, the SSHD is required by condition to undertake a glint and glare assessment to ensure no adverse impacts are experienced (draft Condition 35).
  
- 5.12 Finally, details of electric vehicle parking (draft Condition 10) are required to promote sustainable development.

***Matters not Secured or Controlled by Condition***

- 5.13 Having carefully considered the need to control the development and its effects, including with regard to the tests set out in the PPG, conditions are not required in relation to a number of matters, including in some cases where conditions were recommended or suggested by the Home Office in its submission.
  
- 5.14 As the SSHD makes ongoing improvements in the power supply to the Site and continues to reduce its reliance on temporary generators, MHCLG do not consider a condition is required for the SSHD to assess air quality and identify any mitigation (if required) given the temporary nature of this power solution.
  
- 5.15 The environmental or energy performance of the development is also not conditioned, as these details are controlled as necessary by other legislation.

## 6.0 Overall Conclusion - The Planning Balance

- 6.1 The planning merits of this proposal have been considered in the context of relevant national and development plan policies, and with regard to other material considerations.
- 6.2 In considering the planning merits of the proposed development, we recognise the proposed development predominantly involves the redevelopment of existing buildings and infill development on brownfield land, alongside the re-use and refurbishment of existing buildings. This reduces the physical impacts on the site and its setting and should be taken into account when interpreting the analysis of benefits and harms outlined below.
- 6.3 In considering the planning balance we have taken into account the use of conditions to secure further details and achieve necessary mitigation.
- 6.4 We note that the Local Plan does not have a policy nor site allocation associated with the development need identified in the proposal or requirements of the asylum system generally. Further, the location of the site in a relatively isolated location gives rise to inevitable impacts that are different to those that would arise were the proposed development to be in an urban location.
- There is no conflict with Local Plan Policy SP24 (Development in the Countryside) as development is principally proposed on previously developed parts of the Site, with planning conditions to control the extent and quantum of development. This carries moderate weight in favour of the proposal.
- 6.5 The SSHD has a statutory duty for immigration control and the processing of detained persons. In the interests of border control and national security, they require the infrastructure to bring those who arrive in to the UK irregularly into the immigration system rapidly. Associated training facilities are required to meet the Home Office needs, particularly for staff escorting detained persons. The pressures on the Home Office are increasing as numbers of small boat arrivals are reaching substantial acute levels. A visible crisis point was identified in 2022 when an overcrowding incident at the Site occurred whereby numbers of detained persons in excess of 1,600 were held at the facility for longer periods. This incident is subject to a live non-statutory inquiry. For these reasons, there is a clear and pressing need for a short-term holding facility, with training facilities, to meet national security needs.
- 6.6 If the Home Office is unable to provide the proposed facilities this would lead to severe implications for both the Home Office and asylum seekers. Further, given the site is operational, if refused planning permission it will be necessary to relocate the established facilities, adding to the pressing need. The Site at Manston is suitable as it is well located relative to points of entry by irregular means and the size of the Site is sufficient to accommodate the stages for processing, utilise existing infrastructure and self-contain operations. The proposal's role in meeting the SSHD needs weighs significantly in favour of the proposal and this carries substantial weight and is of national importance.
- 6.7 Also weighing in favour of the proposal are the benefits for employment and to the wider local economy which will be delivered. These carry benefits of substantial weight.
- 6.8 This report has highlighted a number of potential adverse impacts and recommended conditions to address them.

- 6.9 After taking account of mitigations that can be achieved by conditions, the following matters weigh against the proposal; contamination and groundwater, impact on character and appearance (notably localised impacts to neighbouring residential properties), drainage (notably foul water discharge), and operational waste (principally waste storage), although accounting for mitigation achieved by condition, these are not close to levels of harm that would breach relevant national or local policy to justify refusal and carry little weight against the proposal. Similarly, matters relating to noise, lighting, residential amenity and major accident risk are within the limits set by national and local policy, when controlled by condition, and carry limited weight. There are potential harms identified to healthcare and wellbeing of existing communities. However, the secure nature of the proposal for detained persons and on-site healthcare facilities limits the harm such that this carries limited weight.
- 6.10 Considerable tree loss may be associated with the proposal but is required for security and to facilitate the development. Moderate weight is attached to the associated adverse impacts we identify in our assessment relating to biodiversity. However, with conditions to secure further ecology surveys, support precautionary working and require compensatory planting, this consideration carries limited weight.
- 6.11 There are harms to which we attach more than limited weight; impacts on the highway (principally junction capacity). However, conditions to secure local highway improvements prior to operation of the permanent development and the capping of existing car parking number, use of Travel Plan and Car Park Management Plans to be submitted within 6 months of the date of this decision is considered to provide appropriate mitigation and therefore moderate weight is attached.
- 6.12 The report has considered whether there would be any adverse impacts from air quality (notably generators for power generation). With use of these generators a temporary measure, replaced by ongoing improvements to main power, and used for emergency purposes only, this carries little weight.
- 6.13 We have considered whether any heritage harm arises from the development proposal and have found that no such harm is identified to designated heritage assets. Harm is identified to non-designated heritage assets impacted by the proposal, however the scale of harm is limited, with appropriate conditions to address the harm, such that this consideration carries little weight.
- 6.14 Accounting for the risks of climate change from identified hazard sources, a requirement for further climate change risk reduction measures was not considered necessary (particularly as existing regulations and standards provide sufficient protect), and thus carries neutral weight. In summary, the anticipated impacts in all areas are therefore considered to be at acceptable levels – taking into account national and local policy - and at the low end of the scale. None individually or collectively would justify refusal. Where impacts have been identified it is anticipated that these can be effectively mitigated through measures secured by conditions, which include a requirement to submit further details in the future when the specifics of development are known. There are a number of planning benefits, notably in relation to the location of the site, its existing function and national security, which are considered to outweigh the overall impact of the proposed development.

- 6.15 It is concluded that development to be permitted does not conflict with national or local planning policy and there are a number of benefits which would outweigh any impact.

### **Recommendation**

- 6.16 Having assessed the relevant planning considerations and merits of the proposal, including the main planning issues, the recommendation is that planning permission is granted, with the suggested types of planning condition outlined in Appendix 1 attached.

## **Appendix 1 Draft Planning Conditions**

Proposed Condition		Proposed Wording and Reason
1	Time Limit for Implementing the Permission	<p>The development to which this permission relates must be begun not later than the expiration of two years beginning with the date on which the permission is granted.</p> <p><b>Reason:</b> As required by Section 91 of the Town and Country Planning Act 1990.</p>
2	Limit on Detained Persons	<p>No more than 1,600 detained persons may be present on the Site at any one time.</p> <p>The operator of the Site must keep a daily record of the number of detained persons at the Site and make that record available whenever requested to do so by the Secretary of State for Housing, Communities and Local Government.</p> <p><b>Reason:</b> To ensure numbers on site can be accommodated within the available infrastructure and accommodation as detailed in the approved documents submitted with this application.</p>
3	Parameters	<p>The development hereby permitted shall not exceed the following amounts:</p> <p><i>Maximum development area: 108,982 sq. m GEA</i></p> <p><i>Maximum floorspace: 100,991 sq. m GEA</i></p> <p><i>Maximum building heights: 12 metres</i></p> <p><i>Maximum gate, fence and wall heights: 6 metres</i></p> <p><i>Maximum area of solar panels: 7,750 sq. m</i></p> <p><b>Reason:</b> To ensure the development is carried out in accordance with the approved documents, plans and drawings submitted with the application.</p>



4	<b>Phasing</b>	<p>Development of any phase of the permanent Manston Reception Centre or permanent Training Facility shall not commence until a Phasing Plan detailing in the Phases of development has been submitted in writing and approved by the Secretary of State for Housing, Communities and Local Government.</p> <p><b>Reason:</b> To assist the implementation of the permission and ensure the facilities and accommodation provided on site are coordinated.</p>
5	<b>Approved Drawings/Documents</b>	<p>Unless otherwise approved pursuant to other conditions attached to this permission, buildings, structures site operations must comply with the following approved documents:</p> <p><i>Drawings</i></p> <ul style="list-style-type: none"> <li>Parameters Plan Development Zone &amp; Maximum Building Heights (drg. No: 050836-9834-ATR-ZZZ-XX-DR-A-0350-S4-D0100, Rev P13)</li> <li>Parameters Plan Security Fence &amp; Access (drg. No: 050836-9834-ATR-ZZZ-XX-DR-A-0356-S2-D0100, Rev P08)</li> <li>Site Plan – Retrospective Existing Accommodation, Facilities and Ground Works March 2025 (drg. No: 050836-9834-ATR-ZZZ-XX-DR-A-0151-S4-D0100, Rev P10)</li> </ul> <p><i>Documents</i></p> <ul style="list-style-type: none"> <li>Manston Planning Proposal Statement (September 2025, v12)</li> </ul> <p><b>Reason:</b> To ensure the development is carried out in accordance with the approved documents, plans and drawings submitted with the application.</p>

6	<b>Decommissioning / Reinstatement of Temporary Training Facility and Modular Units (comprising the ITPC)</b>	<p>Prior to the de-construction and removal of the Temporary Training Facility or modular buildings (comprising the Initial Triage and Processing Centre), a reinstatement plan shall be submitted to and approved in writing by the Secretary of State for Housing, Communities and Local Government. The reinstatement plan shall include:</p> <ul style="list-style-type: none"> <li>a) Details of reinstatement and site restoration works required;</li> <li>b) Method for undertaken the reinstatement works; and</li> <li>c) A timetable for carrying out the reinstatement works.</li> </ul> <p><b>Reason:</b> To protect the environment and appearance of the area generally in accordance with Paragraph 198 of the Framework.</p>
---	---	---

7	CTMP	<p>Development (including vegetation clearance or building demolition) of any phase of the permanent Manston Reception Centre or permanent Training Facility or the Temporary Training Facility shall not commence until a Construction Traffic Management Plan, for the relevant Phase of development, has been submitted to and approved in writing by the Secretary of State for Housing, Communities and Local Government. The submitted Construction Traffic Management Plan shall include:</p> <ul style="list-style-type: none"> <li>a) An indicative construction programme and key dates.</li> <li>b) Details of routing and site access for vehicles traveling to and from the site in connection with construction work.</li> <li>c) Details of signage required at site access points for construction vehicles and other temporary traffic management measures required, including arrangements for supervising construction vehicle movements to and from the site.</li> <li>d) Arrangements to minimise vehicles associated with construction workers (including reducing single occupancy vehicle use) and management procedures to schedule deliveries to reduce the number of vehicle movements during the AM and PM traffic peaks on Manston Road and Spitfire Way.</li> <li>e) Any temporary traffic management and access arrangements.</li> <li>f) Details of car parking numbers and parking arrangements for construction workers.</li> <li>g) Vehicle wheel washing facilities and other measures to prevent the deposit of mud and other deleterious materials on the highway.</li> </ul> <p>The approved Construction Traffic Management Plan shall be implemented in full throughout the vegetation clearance, demolition and construction period for the relevant phase of development.</p> <p><b>Reason:</b> To ensure highway safety and sustainable travel in accordance with Paragraph 115 of the Framework.</p>
---	------	---

8	Access Signage	<p>Within 6 months following the date of this decision, details of appropriate signage of the Main Access (as identified on the Parameters Plan – Security Fence &amp; Access, drg. No: 050836-9834-ATR-ZZZ-XX-DR-A-0356-S2-D0100, Rev P08) shall be submitted to and approved in writing by the Secretary of State for Housing, Communities and Local Government. The signage shall be installed in accordance with the approved details within one month of approval and retained for the life of the development.</p> <p><b>Reason:</b> In the interests of highway safety in accordance with Paragraph 115 of the Framework.</p>
9	Roundabout	<p>Prior to the operation of the permanent Manston Reception Centre, the roundabout at the Manston Road / B2050 / Spitfire Way Junction must be constructed and completed, with details and written confirmation of its completion submitted by the Secretary of State for the Home Department to the Secretary of State for Housing, Communities and Local Government for approval.</p> <p><b>Reason:</b> To mitigate impacts on the local highway network and ensure highway safety in accordance with Paragraph 115 of the Framework.</p>

10	Car Park Management Plan	<p>Within 6 months following the date of this decision, a Car Park Management Plan shall be submitted to and approved in writing by the Secretary of State for Housing, Communities and Local Government. The Car Park Management Plan shall provide:</p> <ul style="list-style-type: none"> <li>a) Details of the parking layout, including a plan showing car parking locations and numbers.</li> <li>b) Allocation of and arrangements for the management of parking spaces.</li> <li>c) Details of Electric Vehicle Charging Points (EVCP), including location and specification.</li> <li>d) Safety and security measures to be incorporated within the development to ensure the safety of pedestrians and cycle parking.</li> <li>e) Measures to control and manage the flow of vehicles and personnel entering and exiting at the Main Access (as identified on the Parameters Plan – Security Fence &amp; Access, drg. No: 050836-9834-ATR-ZZZ-XX-DR-A-0356-S2-D0100, Rev P08).</li> <li>f) Details of a commitment to the review of the Car Park Management Plan, including prior to the first operation of the permanent Manston Reception Centre or permanent Training Facility.</li> </ul> <p>The approved Car Park Management Plan shall be implemented in full for the life of the development.</p> <p><b>Reason:</b> To mitigate impacts on the local highway network and ensure safe, secure and sustainable parking arrangements in accordance with Paragraphs 115 and 117 of the Framework.</p>
----	--------------------------	--

11	Travel Plan	<p>Within 6 months following the date of this decision, a Travel Plan shall be submitted to and approved in writing by the Secretary of State for Housing, Communities and Local Government. The Travel Plan shall be completed in accordance with the submitted Travel Plan Framework, dated 10 June 2025 (v9) (document reference: 030003991- BHK-XX-XX-RP-PL-0003) and provide:</p> <ul style="list-style-type: none"> <li>a) Targets for achieving: <ul style="list-style-type: none"> <li>i) Defined percentage reduction in single occupancy vehicles (SOV);</li> <li>ii) Defined percentage modal shift to sustainable travel modes.</li> </ul> </li> </ul> <p>With details of the baseline against which the targets are to be considered.</p> <ul style="list-style-type: none"> <li>b) The time period over which the targets set out in (a) are intended to be achieved.</li> <li>c) Measures to achieve these targets together with an implementation plan detailing the timeframe in which specific measures will be introduced.</li> <li>d) Monitoring and management arrangements together with a review process.</li> <li>e) Arrangements for identifying any additional Travel Plan measures should any target(s) not be met.</li> <li>f) Confirmation of the hours when servicing of the foul water storage tanks will take place, to avoid peak hours.</li> </ul> <p>The approved Travel Plan shall be implemented in full for the life of the development.</p> <p><b>Reason:</b> To mitigate impacts on the local highway network and secure a modal shift to sustainable travel modes by staff in accordance with Paragraphs 115 and 118 of the Framework.</p>
----	-------------	---

12	Parking	<p>The total number of parking spaces at the Site shall not exceed the following, in accordance with the submitted Transportation Assessment, dated 18 June 2025 (v9) (document reference: 030003991- BHK-XX-XX-RP-PL-0002), unless otherwise approved in writing by the Secretary of State for Housing, Communities and Local Government:</p> <ul style="list-style-type: none"> <li>a) 800 car parking spaces (including 22 disabled parking spaces), of which a minimum of 25% spaces shall provide active electric vehicle charging.</li> <li>b) 41 motorcycle spaces.</li> <li>c) 21 van spaces, with all to provide active electric vehicle charging.</li> <li>d) 30 cycle spaces.</li> <li>e) 4 coach spaces.</li> <li>f) 37 additional car parking spaces for the Permanent Training Facility, with all to provide active electric vehicle charging.</li> </ul> <p><b>Reason:</b> To ensure the development is carried out in accordance with the approved documents and to mitigate impacts on the local highway network in accordance with Paragraphs 113 and 115 of the Framework.</p>
----	---------	---

13	<b>Further Ground Investigation</b>	<p>Development of any phase of the permanent Manston Reception Centre and or permanent Training Facility shall not commence until ground investigations covering the relevant phase has been completed, and a report of the findings submitted to and approved in writing by the Secretary of State for Housing, Communities and Local Government. The report shall include consideration of receptors to include human health (existing and future site users), property (existing or proposed) including but not limited to buildings, crops, livestock, pets, woodland and service lines and pipes, adjoining land, ground waters and public water abstraction and ecological systems. The approved report shall be implemented thereafter throughout construction.</p> <p><b>Reason:</b> To ensure works in potentially contaminated areas do not present a risk to groundwater and potential sources of contamination associated with the historical use of the Site are appropriately investigated in accordance with Paragraph 187 of the Framework.</p>
----	-------------------------------------	---



14	Detailed Remediation Strategy	<p>Where the further ground investigation required under Condition 13 identifies a requirement for remediation, development of any phase of the permanent Manston Reception Centre or permanent Training Facility shall not commence until a detailed remediation strategy including a remediation options appraisal for the relevant phase of development has been completed, submitted to and approved in writing by the Secretary of State for Housing, Communities and Local Government.</p> <p>This strategy should detail regulatory approval and confirmation of the volumes of materials to be reused on-site and any appropriate environmental permits and required licences. The strategy shall include:</p> <ul style="list-style-type: none"> <li>a) conceptual site model</li> <li>b) remediation objectives</li> <li>c) contamination survey results</li> <li>d) details of watching brief</li> <li>e) measures for the management of unexpected contamination</li> <li>f) recommendations for further work</li> <li>g) production of a verification plan providing details of the data that will be collected to demonstrate that the works set out in the remediation strategy are complete and identifying any requirements for longer-term monitoring of pollutant linkages, mitigation, maintenance and arrangements for contingency action.</li> </ul> <p>The approved strategy shall be implemented thereafter throughout construction.</p> <p><b>Reason:</b> To ensure works in contaminated areas do not present a risk to groundwater and potential sources of contamination associated with the historical use of the Site are appropriately mitigated and remediated in accordance with Paragraph 187 of the Framework.</p>
----	-------------------------------	---

15	<b>Remediation Verification Report</b>	<p>Prior to the occupation of any permanent new building of any phase, a verification report demonstrating the completion of works set out in an approved remediation strategy for that phase, required under Condition 14, and the effectiveness of the remediation, shall be submitted to and approved in writing by the Secretary of State for Housing, Communities and Local Government. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met.</p> <p><b>Reason:</b> To ensure that the site does not pose any further risk to human health or the land and water environment by demonstrating that the requirements of the approved verification plan have been met and that remediation of the site is complete, in accordance with paragraph 187 of the Framework.</p>
----	--	--

16	Radiation Remediation Strategy	<p>Within 1 month following the date of this decision, the areas identified as recording elevated radiation measurements in the submitted Radiological Remediation Plan (v1) (dated 21 November 2024) which have not been remediated shall be secured to prevent access. Appropriate protection measures shall be maintained until such time as appropriate remediation has been completed and certified.</p> <p>Where required under Section 5.6 of the Outlined Remediation Strategy Approach dated 16 June 2025 (v9) (document reference 050836-9834-ATK-ZZZ-XX-RP-G-0001-S4-A3100), development of any phase of the permanent Manston Reception Centre or permanent Training Facility shall not commence until a Radiation Remediation Strategy for the relevant phase of development has been prepared and implemented in accordance with Section 5.6 of the Outlined Remediation Strategy Approach dated 16 June 2025 (v9) (document reference 050836-9834-ATK-ZZZ-XX-RP-G-0001-S4-A3100). The Radiation Remediation Strategy for the relevant phase shall be submitted to and approved in writing by the Secretary of State Housing, Communities and Local Government prior to commencement of the phase, and implemented thereafter throughout construction.</p> <p>Prior to the occupation of any permanent new building of any phase a radiation remediation verification report demonstrating the completion of works set out in the approved radiation remediation strategy shall be submitted to, and approved in writing, by the Secretary of State for Housing, Communities and Local Government.</p> <p>All radiation remedial works shall be undertaken in accordance with the Ionising Radiations Regulations 2017 and with any necessary Radioactive Substance Permit.</p> <p><b>Reason:</b> In the interests of the human health of persons on the site in accordance with Paragraph 187 of the Framework.</p>
----	--------------------------------	--

17	<b>Materials Management Plan</b>	<p>Development of any phase of the permanent Manston Reception Centre or permanent Training Facility shall not commence until a Materials Management Plan (MMP) has been completed for the relevant phase of development, in accordance with the submitted Outline Remediation Strategy Approach dated 16 June 2025 (v9) (document reference 050836-9834-ATK-ZZZ-XX-RP-G-0001-S4-A3100). The MMP should be developed in accordance with the CL: AIRE Definition of Waste: Development Industry Code of Practice for site won soils that are scheduled to be reused on-site or for importing of clean naturally occurring materials, as required. The MMP must consider the proposed earthworks and materials management and provide a risk-based approach to the characterisation of arisings and control of material reuse.</p> <p>The MMP for the relevant phase shall be submitted to and approved in writing by the Secretary of State Housing, Communities and Local Government prior to commencement of the phase, and implemented thereafter throughout construction.</p> <p><b>Reason:</b> In the interest of pollution control in accordance with Paragraph 187 of the Framework.</p>
----	----------------------------------	--

18	<b>UXO Risk Management</b>	<p>Prior to the development of any phase of development involving excavation or breaking ground in areas not covered by previous UXO survey, clearance and verification information previously submitted to the Secretary of State for Housing, Communities and Local Government, a method statement for the survey and investigation of unexploded ordnance for the relevant phase of development shall be submitted to and approved by the Secretary of State for Housing, Communities and Local Government. The survey and investigation works shall be undertaken in accordance with the approved details, and verification confirmation shall be submitted for remedial works undertaken prior to first occupation of the relevant phase.</p> <p>At all times during the construction and operational phases of the development, building on the principles contained within the Detailed Unexploded Ordnance Risk Assessment (2024), a comprehensive response plan must be maintained that details a protocol for a scenario whereby unexploded ordnance is discovered. The plan must be prepared by a qualified expert and must be shared with all construction and operational staff at induction, and remain available on-site at all times.</p> <p><b>Reason:</b> To ensure appropriate arrangements are in place to manage UXO risk and that environmental and health risks have been managed so that the Site is deemed suitable for use in accordance with Paragraph 196 and 197 of the Framework.</p>
19	<b>Archaeology – Historic Building Record and Recording of Sub-surface remains</b>	<p>Prior to commencement of the demolition of the remaining 20th century military heritage assets and any development in the area comprising the former resident's huts (non-designated heritage asset ref: MKE100326) and the Secretary of State for the Home Department shall undertake a Historic Building Recording (Level 1), including of any below-ground remains of the resident's huts and shall submit that to the Secretary of State for Housing Communities and Local Government and the Kent County Archive, for information.</p> <p><b>Reason:</b> To ensure for appropriate recording of heritage assets in accordance with Paragraph 218 of the Framework.</p>

20	Plans	<p>Development of any Phase of the permanent Manston Reception Centre or permanent Training Facility shall not commence until detailed layout plans, floor plans, section and elevation drawings for the relevant phase are submitted to and approved in writing by the Secretary of State for Housing Communities and Local Government. The layout plans shall include details of any means of enclosure, floor plans shall include finished floor levels and the drawings shall include details of elevation design details including materials.</p> <p><b>Reason:</b> To safeguard environmental character and ensure an acceptable form of development in accordance with Paragraph 135 and 187 of the Framework.</p>
----	-------	---

21	<b>Drainage – Surface and Foul Water Drainage Strategy</b>	<p>1. Development of the permanent Manston Reception Centre or permanent Training Facility shall not commence until a Site-Wide Surface and Foul Water Drainage Strategy has been submitted to and approved by the Secretary of State for Housing Communities and Local Government. The development shall be undertaken in accordance with the approved Surface and Foul Water Drainage Strategy.</p> <p>2. The Site-Wide Surface and Foul Water Drainage Strategy shall include:</p> <ul style="list-style-type: none"> <li>a) assessment of SuDS as listed in CIRIA SuDS Manual (C753) and justification provided for exclusion if necessary.</li> <li>b) water quality assessment</li> <li>c) details of surface water attenuation</li> <li>d) flow rate and discharge rate calculations</li> <li>e) full construction details of all SuDS components</li> <li>f) surface water treatment requirements</li> <li>g) maintenance requirements</li> <li>h) detailed drainage layout</li> <li>i) calculations to demonstrate that the proposed drainage system can accommodate storm events without flooding including allowances for climate change.</li> </ul> <p>3. Confirmation that an Environmental Permit shall be obtained from the Environment Agency for the waste water treatment plant prior to its construction, if required.</p> <p>No phase of the permanent Manston Reception Centre or permanent Training Facility is to be occupied until the construction of the surface and foul water drainage for the relevant Phase is completed.</p> <p><b>Reason:</b> To ensure the development is served by satisfactory arrangements for the management of surface water and to ensure that the development does not present an unacceptable risk of on/off-site flooding in accordance with Paragraphs 181 and 182 of the Framework.</p>
----	--	---

22	Drainage - FFL	<p>Development of any phase of the permanent Manston Reception Centre or permanent Training Facility and the installation of any temporary modular buildings (comprising the Initial Triage and Processing Centre) and temporary Training Facility shall not commence until, details of the finished floor levels of any proposed new buildings for the relevant phase shall be submitted to and approved in writing by the Secretary of State for Housing Communities and Local Government.</p> <p><b>Reason:</b> To ensure that the development is safe for occupation and does not increase flooding risk elsewhere in accordance with Paragraph 170 of the Framework.</p>
23	Foul Water	<p>Prior to first occupation of the permanent Manston Reception Centre or permanent Training Facility, the Secretary of State for the Home Department shall confirm to the Secretary of State for Housing, Communities and Local Government that there is capacity within the local waste water network to accommodate the development.</p> <p>In the event that insufficient waste water capacity is available, a Waste Water Management Strategy confirming how waste water will be managed shall be submitted to and approved in writing by the Secretary of State for Housing, Communities and Local Government prior to first use of the permanent Manston Reception Centre or permanent Training Facility.</p> <p><b>Reason:</b> To ensure the development is served by satisfactory arrangements for the management of foul water and does not present a risk to ground water in accordance with Paragraph 197 of the Framework.</p>



24	Ecology Surveys	<p>Prior to commencement of the relevant Phase of development, the Secretary of State for the Home Office must conduct the following surveys for the relevant phase of development if works are planned in areas of moderate or high biodiversity importance in accordance with the Manston Planning Proposal - Ecological Appraisal dated 18 March 2025 (document reference: 050836-9834-EPR-ZZZ-XX-RP-Z-0001-S2-A1300).</p> <p>a) Reptile Survey</p> <p>b) Invertebrate Survey</p> <p>c) Botany Survey</p> <p>d) Bat Inspection and Emergence Survey where the validity of survey work expires before demolition is planned.</p> <p>The results of all such surveys and details of any necessary mitigation measures for the relevant phase of development shall be submitted to the Secretary of State for Housing Communities and Local Government.</p> <p><b>Reason:</b> To ensure the protection of wildlife, ecology and supporting habitat in accordance with Paragraph 187 of the Framework.</p>
----	-----------------	---

25	Tree Protection	<p>No Category A or Category B trees or hedges within the Site (as identified in the Arboricultural Impact Assessment dated 10 June 2025 (v7) (document reference: 050836-9834-ATR-ZZZ-XX-RP-L-0001- S4-A1200) shall be felled, uprooted, wilfully damaged or destroyed or removed without the prior written consent of the Secretary of State for Housing Communities and Local Government.</p> <p>Category A or Category B trees or hedges proposed for removal may require compensatory planting, with details submitted as part of the Landscape and Ecological Management Plan.</p> <p><b>Reason:</b> In the interests of amenity and in accordance with Paragraph 187 of the Framework.</p>
26	Badger Survey	<p>The Secretary of State for the Home Department shall undertake a further badger walkover survey within 6 months of the date of this decision, in accordance with the recommendations of the submitted Badger Survey and submit the findings of that to the Secretary of State for Housing Communities and Local Government within 7 months of the date of this decision.</p> <p><b>Reason:</b> To ensure the protection of wildlife in accordance with Paragraph 187 of the Framework.</p>

27	<b>Construction and Environmental Management Plan (Biodiversity), incorporating Precautionary Method of Working Statement</b>	<p>No development (including vegetation clearance or demolition, extension or conversion of buildings) shall commence on a relevant Phase until Construction and Environmental Management Plan (CEMP) (Biodiversity) including a Precautionary Method of Working (PMW) statement, for the relevant phase of development, prepared by a suitability qualified ecologist, is submitted to and approved in writing by the Secretary of State for Housing, Communities and Local Government:</p> <p>The CEMP (Biodiversity) shall include, where relevant to a phase:</p> <ul style="list-style-type: none"> <li>a) Identification of ecological constraints.</li> <li>b) Application of best practicable means to avoid adverse effects of lighting from construction on sensitive ecological receptors.</li> <li>c) Management of risks arising from the presence of invasive species.</li> <li>d) The protection of the natural environment, including a PMW statement detailing: <ul style="list-style-type: none"> <li>i) A summary of ecology survey results;</li> <li>ii) Rational as to why a chosen PMW is considered appropriate;</li> <li>iii) Measures to manage and protect to wild birds (as defined in Section 27 (1) of the Wildlife and Countryside Act 1981), their eggs and nests, protected species and local priority species and habitats, including their breeding habitat, foraging and commuting routes.</li> </ul> </li> </ul> <p>No removal of any vegetation or the demolition, extension or conversion of buildings shall take place between 1st March and 31st August in any year, unless a detailed survey has been carried out to check for nesting birds. Where nests are found in any building, hedgerow, tree or scrub or other habitat to be removed (or converted or demolished in the case of buildings), a 4m exclusion zone shall be left around the nest until breeding is complete. Completion of nesting shall be confirmed by a suitably qualified</p>
----	---	--

		<p>person and a report submitted to and approved in writing by the SSHCLG before any further works within the exclusion zone take place.</p> <p>iv) Measures to protect the calcareous grassland covering the eastern part of the site (known as the Shooting Range Meadow) as shown on MAP1 Survey Area and Survey Units within the Botany Survey 050836-9834-EPR-ZZZ-XX-RP-Z-0004-S2-A1300 (June 2025) during construction, and details of its replacement of any that is lost. e) Protection of amphibian and reptile species.</p> <p>f) If development is required within the area where the Lizard Orchid is present (development zone fronting onto Manston Road) then the SSHO shall obtain a mitigation licence for such works from Natural England.</p> <p>g) Measures to prevent damage to trees (in accordance with BS5837:2012) or hedges that are to be retained on the site or immediately adjacent to any part of the site where construction work is to be carried out.</p> <p>h) A methodology which addresses demolition, breaking out of existing hard surfaces and construction within the root protection areas that may impact on the retained trees.</p>
--	--	---

		<p>i) Arrangements for the appointment and retention of a suitably qualified arboriculturist and ecologist, to carry out, supervise or verify any work in relation to the construction of the authorised development to which their expertise is relevant.</p> <p>j) Measures to manage and protect unexpected protected flora and fauna during the construction works.</p> <p>k) If development is required within a location containing Basil Thyme, a Translocation Method Statement shall be produced, which shall include:</p> <p style="padding-left: 40px;">i) Identification and detailed design of the receptor site</p> <p style="padding-left: 40px;">ii) Methodology for translocation.</p> <p>iii) Long term design objectives, management responsibilities and maintenance schedules.</p> <p>iv) A scheme detailing how the receptor site will be established, managed and maintained, including intervening actions required to ensure suitable conditions are met within the predicted timeframes.</p> <p>v) A habitat monitoring scheme.</p> <p>The approved CEMP (Biodiversity) shall be implemented in full throughout the vegetation clearance, demolition and construction periods.</p> <p><b>Reason:</b> To ensure appropriate measures for the protection of wildlife, ecology and supporting habitat during construction in accordance with Paragraph 187 and 193 of the Framework.</p>
--	--	---

28	CEMP	<p>No development (including vegetation clearance or demolition, extension or conversion of buildings) shall commence on a relevant Phase until a Construction Environmental Management Plan (CEMP) for the relevant Phase of development has been submitted to and approved in writing by the Secretary of State for Housing, Communities and Local Government. The submitted CEMP shall include, where relevant to a phase:</p> <ul style="list-style-type: none"> <li>a) The Hours within which construction may take place.</li> <li>b) Dust Management Plan, including: <ul style="list-style-type: none"> <li>i) The setting of limits that must not be exceeded of dust and other emissions to air;</li> <li>ii) Monitoring compliance with prescribed emission limits; and</li> <li>iii) Measures for mitigating the impact of such emissions, including alternative working practices to be adopted if such emissions temporarily exceed, or are likely to exceed a prescribed emission limit.</li> </ul> </li> <li>c) Stakeholder Communications plan, detailing: <ul style="list-style-type: none"> <li>i) Arrangements to engage with adjoining owners or occupiers, including keeping them informed about construction work in so far as it may reasonably be expected to affect them; and</li> <li>ii) How and with whom they may raise complaints about it.</li> </ul> </li> <li>d) Construction Noise and Vibration Assessment, including: <ul style="list-style-type: none"> <li>i) The setting of limits that must not be exceeded,</li> <li>ii) Monitoring compliance with prescribed noise and vibration limits; and</li> <li>iii) Measures for mitigating the impact of noise and vibration, including alternative working practices to be adopted if noise or vibration temporarily exceeds, or is likely to exceed a prescribed noise and vibration limit.</li> </ul> </li> </ul>
----	------	--

		<p>e) Management of surface water, including:</p> <ul style="list-style-type: none"> <li>i) Any temporary structures to convey, attenuate or treat surface water on the site;</li> <li>ii) Measures to limit and remove suspended soils and other pollutants contained in surface water runoff.</li> <li>iii) All existing drainage systems must be identified on a plan.</li> </ul> <p>f) The assessment and prevention of risks associated with rainfall events.</p> <p>g) Arrangements for soil handling and management, including site won spoil.</p> <p>h) Application of best practicable means to avoid adverse effects of lighting from construction on the amenity of adjoining owners and occupiers.</p> <p>i) Arrangements for safe and secure material storage, including materials which are classified as hazardous, with a plan showing the location of material storage areas.</p> <p>j) Arrangements for site compounds and contractor working and welfare areas and temporary fencing and hoardings, including a plan showing their locations.</p> <p>k) Arrangements for site security and ensuring the safety of detained persons, those visiting the site and those working on construction while construction work is being carried out.</p> <p>l) Management of waste in accordance with the waste hierarchy.</p> <p>m) Assessment and prevention of contamination (including asbestos) that may arise from construction work.</p> <p>n) Assessing and managing risks associated with UXO, including the application of best working practises and briefings for construction workers undertaken by a suitably qualified ordnance specialist.</p> <p>o) Provision of awareness training to contractors in relation to contamination, UXO and other risks that may be associated with construction work.</p>
--	--	--

		<p>p) Prior to the erection of any construction crane(s) on-site, a construction methodology statement and diagrams clearly presenting the location, maximum operating height, radius and start/finish dates for the use of the cranes during the development have been submitted to and approved in writing by the Secretary of State for Housing, Communities and Local Government.</p> <p>q) Arrangements for the appointment and retention of a suitably qualified archaeologist, ordnance specialist, contamination and radiation experts, to carry out, supervise or verify any work in relation to the construction of the authorised development to which their expertise is relevant. r) Evidence of registration with the Considerate Constructions Scheme (or its successor).</p> <p>s) Confirmation that the CEMP must be kept on the site at all times.</p> <p>t) Requirement that the CEMP must be kept up to date during any period in which construction takes place in relation to the authorised development.</p> <p>The approved Construction Environmental Management Plan shall be implemented in full throughout the vegetation clearance, demolition and construction periods.</p> <p><b>Reason:</b> To ensure appropriate measures for environmental protection and to safeguard the safety and amenity of staff, detained persons and neighbouring residents during construction in accordance with Paragraph 198 of the Framework.</p>
--	--	--



29	<b>Ecology – Landscape and Ecological Management Plan</b>	<p>No development (including vegetation clearance or demolition, extension or conversion of buildings) shall commence on a relevant Phase until a Landscape and Ecological Management Plan (LEMP) for the relevant Phase of development, prepared by a suitability qualified ecologist, has been submitted to and approved in writing by the Secretary of State for Housing, Communities and Local Government and shall include:</p> <ul style="list-style-type: none"> <li>a) a detailed ecological design, including visual screening measures;</li> <li>b) a detailed planting scheme for ecological mitigation and enhancement areas including species list;</li> <li>c) enhancements for amphibian and reptile species including the creation of green corridors through the site incorporating brash/log/rock piles to provide shelter and overwintering opportunities;</li> <li>d) detailed compensation measures, including details of replacement planting required for any Category A and B Trees to be removed;</li> <li>e) details of plant establishment for a period of 5 years, with failures replaced on a like-for-like basis;</li> <li>f) long term design objectives, management responsibilities and maintenance schedules for all landscape areas;</li> <li>g) a scheme detailing how the new habitat will be established, managed and maintained, including actions to be taken if the desired conditions are not reached within the predicted timeframes; and</li> <li>h) a habitat monitoring scheme.</li> </ul> <p><b>Reason:</b> In the interest of nature conservation and to protect appearance of the area generally, in accordance with 187 and 192 of the Framework.</p>
----	---	---

30	<b>Operational Noise &amp; Plant</b>	<p>Operational noise emitted from the development, including building services or other plant, shall be minimised between the hours of 23:00 and 07:00 daily so that internal ambient noise levels in all habitable rooms is no greater than 35dB LAeq, 16 hour and sleeping accommodation does not exceed 30dB LAeq, 8 hour and 45dB L<sub>Amax</sub> more than ten times per night, assessed in accordance with British Standard BS 8233:2014. Internal ambient noise levels in offices shall not exceed 45 dB LAeq T and 35dB LAeq T for interview rooms, in accordance with BS 8233:2014</p> <p>Building services or plant noise levels, calculated by reference between any point on the site boundary and the façade of nearest residential premises that are noise sensitive receptors, must not exceed 30dB L<sub>Ar</sub>, T<sub>r</sub>, assessed in accordance with British Standard BS 4142:2014+A1:2019.</p> <p><b>Reason:</b> To ensure an acceptable noise environment for staff and detained persons and amenity of neighbouring residents in accordance with Paragraph 198 of the Framework.</p>
31	<b>Noise and Vibration Impact Assessment</b>	<p>Development (excluding enabling works) of the permanent Manston Reception Centre or permanent Training Facility shall not commence until a Noise and Vibration Impact assessment (NVIA) has been submitted to and approved in writing by the Secretary of State for Housing, Communities and Local Government. The NVIA must demonstrate that there would be no adverse impacts to staff and detained persons at the Site or neighbours from noise and vibration. The NVIA must be completed in accordance with the submitted NVIA dated 09 June 2025, including being assessed in accordance with BS 8233:2014.</p> <p><b>Reason:</b> To ensure an acceptable noise environment for staff and detained persons and amenity of neighbouring residents in accordance with Paragraph 198 of the Framework.</p>

32	Lighting Strategy	<p>Within 6 months of the date of this decision and prior to the installation of any further external lighting, a detailed lighting strategy, which includes advice from a suitably qualified lighting engineer and ecologist, shall be submitted to and approved by the Secretary of State for Housing, Communities and Local Government.</p> <p>The strategy should include details of all existing and proposed external light locations, heights, beam direction/ angles, hours of operation and technical specifications (including control mechanism and luminaires) in respect of the site perimeter, buildings and structures, demonstrating through lighting contour plans how amenity of on-site sleeping accommodation and nearby residential receptors is preserved, as well as mitigating impacts on local ecology. It should include dark areas and avoid light spill upon bat roost features, bat commuting and foraging habitat (boundary hedgerows, trees, watercourses etc.) aiming for a maximum of 1lux light spill on those features.</p> <p>Any recommendations for works to the existing lighting shall include a timeframe for completion of the works, and those works shall be undertaken in accordance with the approved strategy.</p> <p>The lighting strategy shall be updated, submitted to and approved by the Secretary of State for Housing, Communities and Local Government prior to the development of any future phase to provide details of the lighting proposed in the relevant phase, and implemented as approved prior to the first occupation of the relevant phase.</p> <p>Any lighting required for security or other purposes at night must be designed sensitively in accordance with the Institute of Lighting Professionals, ILP (2023) Guidance Note: GN08/23 and the Bat Conservation Trust Guidance Note 08/18 (Bats and Artificial Lighting in the UK).</p> <p>No other external lighting shall be implemented without written approval from the Secretary of State for Housing, Communities and Local Government.</p> <p><b>Reason:</b> To ensure the safety and security of the site and in the interests of habitat and amenity protection in accordance with Paragraph 198 of the Framework.</p>
----	-------------------	---

33	<b>Operational Waste</b>	<p>Operational waste arising from the development should be managed at all times in accordance with the principles contained within the Operational Waste Management Strategy dated 23 September 2025 (v.7) (document reference: 050836-9834-ATR-XXX-XX-RP-Y-0001-S2-C1000), or an alternative strategy submitted to and approved in writing by the Secretary of State for Housing, Communities and Local Government.</p> <p>Any alternative strategy must include confirmation of the locations for operational waste storage and how the amenity of detained persons and staff will be protected from odour.</p> <p><b>Reason:</b> In the interests of environmental protection and residential amenity and to ensure waste is managed appropriately, in accordance with Paragraph 8 of the Framework.</p>
34	<b>Temporary Foul Treatment Plant</b>	<p>Prior to the installation of any Temporary Foul Treatment Plant, details of the Temporary Foul Treatment Plant shall be submitted to and approved by the Secretary of State for Housing Communities and Local Government. The details shall include detailed design information, the operational management and maintenance regime, odour mitigation strategy and intended period of use, and include evidence of engagement with Southern Water to confirm the plant is of sufficient capacity to ensure no adverse impacts on the surrounding wastewater infrastructure. The development shall be carried out in accordance with the approved details and retained until a fixed connection is secured.</p> <p><b>Reason:</b> To ensure the development is served by satisfactory arrangements for the temporary disposal of foul water and does not present a risk to ground water in accordance with Paragraph 197 of the Framework.</p>
35	<b>Solar – Glint and Glare Assessment</b>	<p>Prior to the installation of any roof top solar photovoltaic panels approved, a glint and glare assessment shall be submitted and approved by Secretary of State for Housing, Communities and Local Government. The assessment must ensure no adverse impacts from glare are experienced by pilots of aircraft at Manston Airport.</p> <p><b>Reason:</b> In the interests of the safety of aircraft at Manston Airport.</p>

## Definitions

The following terms, used in the above conditions, mean:

- Detained Person – means an individual held under immigration powers in a short-term holding facility whilst their identity and circumstances are ascertained by the Home Office.
- Initial Triage and Processing Centre – means a short-term holding facility for the detention, screening and processing of detained persons. The ITPC consists of marquees (or temporary modular buildings) to screen and temporarily accommodate all detained person arrivals.
- Temporary Training Facility – means a staff training facility for up to a total of 100 persons (trainers and trainees) to be provided on an interim basis until the permanent training facilities to be provided as part of the permanent Manston Reception Centre and Training Facility are available.
- Manston Reception Centre and Training Facility – means the permanent short-term holding facility for the detention, screening and processing of detained persons and the permanent staff training facilities.
- Phase – means a phase (area or stage) of development identified in the Phasing Plan approved pursuant to Condition 4
- Commencement of Development: Material operation within the meaning of s56(4) of the TCPA shall not include: Operations undertaken with or associated with investigations for the purpose of assessing ground conditions (alternatively contamination), remediation works, environmental investigations, site and soil surveys, erection of a contractors' compound, erection of a site compound, erection of site fencing to the boundary, temporary display of site notices.'

## Informative

- The demolition of the five buildings covered by the Prior Approval Notification issued by Thanet District Council on 4 February 2025 (Ref: DM/TH/24/1457) is not controlled by this permission. .

## **Appendix 2 List of documents submitted by the Home Office and considered**

### *Plans*

- Site Location Plan For Approval (drg. No: 050836-9834-ATR-ZZZ-XX-DR-A-0001-S4-Do100, Rev P05)
- Site Plan – Retrospective Existing Accommodation, Facilities and Ground Works March 2025 For Approval (drg. No: 050836-9834-ATR-ZZZ-XX-DR-A-0151-S4-Do100, Rev P10)
- Parameters Plan Development Zone & Maximum Building Heights For Approval (drg. No: 050836-9834-ATR-ZZZ-XX-DR-A-0350-S4-Do100, Rev P13)
- Parameters Plan Demolition – Future Phases For Information (drg. No: 050836-9834-ATR-ZZZ-XX-DR-A-0251-S2-Do100, Rev P08)
- Parameters Plan – Security Fence & Access For Approval (drg. No: 050836-9834-ATR-ZZZ-XX-DR-A-0356-S4-Do100, Rev P08)
- Existing Site Plan – Baseline Prior to Dec. 2021 For Information (drg. No: 050836-9834-ATR-ZZZ-XX-DR-A-0150-S2-Do100, Rev P10)
- Demolition Plan – Phase 1 Completed (Dec 2023) For Information (drg. No: 050836-9834-ATR-ZZZ-XX-DR-A-0250-S2-Do100, Rev P08)
- [Confidential] Illustrative Proposed Site Layout With Temporary Proposed Marquees For Information (drg. No: 050836-9834-ATR-ZZZ-XX-DR-A-0360-S2-Do100, Rev P10)

### *Documents*

- Planning Submission Cover Letter (dated 26 June 2025)
- Application Form (dated 03 October 2025)
- Planning Proposal Statement (v12) (dated September 2025)
- Manston Engagement Report (dated October 2025)
- Arboricultural Impact Assessment (v7) (dated June 2025) (doc. ref: 050836-9834-ATR-ZZZ-XX-RP-L-0001-S4-A1200)
- Bat Survey (dated 18 March 2025) (doc. ref: 050836-9834-EPR-ZZZ-XX-RP-Z-0002-S2-A1300)
- Air Quality Assessment (v3.6) (dated 17 September 2025) (doc. ref. 50836-9834-ATR-ZZZ-XX-RP-Y-0001-S4-A3200)
- Archaeological Desk Based Assessment (v1.5) (dated 17 March 2025) (doc. ref. 050836-9834-ATR-XXX-XX-RP-Z-0001-S4-C0200)
- Bird Survey (18 March 2025) (doc. ref: 050836-9834-EPR-ZZZ-XX-RP-Z-0003-S2-A1300)
- [Confidential] Badger Survey (18 March 2025) (doc. ref: 050836-9834-EPR-ZZZ-XX-RP-Z-0008-S2-A1300)
- Botany Survey (17 June 2025) (doc. ref: 050836-9834-EPR-ZZZ-XX-RP-Z-0004-S2-A1300)
- Climate Change Resilience Assessment (v7) (16 June 2025) (doc. ref: 050836-9834-ATR-ZZZ-ZZ-RP-Y-1001-S4-C0900)

- Cumulative Effects Assessment (v1.6) (19 June 2025) (doc. ref: 050836-9834-ATR-ZZZ-XX-RP-P-0002-S2-Co900)
- Dover A20 AQMA Supplementary Air Quality Assessment (v1.2) (19 March 2025) (doc. ref: 50836-9834-ATR-ZZZ-XX-RP-Y-0002-S4-A3200)
- Drainage Feasibility Report (v10) (16 June 2025) (doc. ref: 50836-9834-ATR-XXX-XX-RP-C-0003-S2-A4300)
- Energy and Sustainability Statement (v6.1) (3 July 2025) (doc. ref: 050836-9834-ATR-ZZZ-XX-RP-Z-0001-S2-Co900)
- EIA Screening Request (Parts 1 & 2) (v8.10) (23 June 2025) (doc. ref: 50836-9834-ATR-ZZZ-XX-RP-C-0001-S2-Co400)
- Ecological Appraisal (18 March 2025) (doc. ref: 050836-9834-EPR-ZZZ-XX-RP-Z-0001-S2-A1300)
- Ecological Impact Assessment (20 June 2025) (doc. ref: 050836-9834-EPR-ZZZ-XX-RP-Z-0007-S2-A1300)
- Ecological Constraints and Opportunities (06 June 2025) (doc. ref: 050836-9834-EPR-ZZZ-XX-RP-Z-0006-S2-A1300)
- Flood Risk Assessment (v6) (04 June 2025) (doc. ref: 050836-9834-ATR-XXX-XX-RP-C-0001-S2-A1000)
- Equality Impact Assessment
- Geophysical Survey Technical Note (v8) (19 June 2025)
- Geotechnical Desk Study (vP11) (10 June 2025) (doc. ref: 030003991- BHK-XX-XX-RP-G-0001)
- Ground Investigation Report (v5) (21 March 2025) (doc. ref: 050836-9834-ATR-ZZZ-XX-RP-G-0002-S4-A3100)
- Habitat Regulations Assessment Stage 1 Screening (v8) (21 March 2025) (doc. ref: 050836-9834-ATR-ZZZ-XX-RP-G-0001-S4-A1300)
- Great Crested Newt Survey (18 March 2025) (doc. ref: 050836-9834-EPR-ZZZ-XX-RP-Z-0005-S2-A1300)
- Human Health Impact Assessment (v1.6) (19 June 2025) (doc. ref: 050836-9834-ATR-ZZZ-XX-RP-P-0001-S2-Co900)
- Landscape and Visual Impact Assessment (v7) (18 June 2025) (doc. ref: 050836-9834-ATR-ZZZ-XX-RP-L-0001-S4-B1200)
- Manston Landscape Strategy (v8) (15 September 2025) (doc. ref: 050836-9834-ATR-ZZZ-XX-RP-L-0001-S3-A4100)
- Noise and Vibration Impact Assessment) (v10) (09 June 2025) (doc. ref: 050836-9834-ATR-ZZZ-XX-RP-Y-0001-S4-A0400)
- Lighting Assessment (vP12) (29 September 2025) (doc. ref: 030003991- BHK-XX-XX-RP-E-0001)
- Operational Waste Management Strategy (v7) (23 September 2025) (doc. ref: 050836-9834-ATR-XXX-XX-RP-Y-0001-S2-C1000)

- Outline Construction Environmental Management Plan (v8) (27 June 2025) (doc. ref: 050836-9834-ATR-XXX-XX-RP-Y-0002-S4-Co900)
- Outline Construction Traffic Management Plan (vP09) (18 June 2025) (doc. ref: 030003991- BHK-XX-XX-RP-PL-0007)
- Radiological Remediation Plan (v1) (21 November 2024) (doc. ref: AHP/ATK/REP/24/02)
- Outline Remediation Strategy (v9) (16 June 2025) (doc. ref: 050836-9834-ATK-ZZZ-XX-RP-G-0001-S4-A3100)
- Socio-Economic Impact Statement (v4) (June 2025)
- [Confidential] Statement on National Importance and Urgency (24 June 2025)
- Topographical Survey (22 February 2023)
- Transportation Assessment (v9) (18 June 2025) (doc. ref: 030003991- BHK-XX-XX-RP-PL-0002)
- Travel Plan Framework (v09) (10 June 2025) (doc. ref: 030003991-BHK-XX-XX-RP-PL-0003)
- Unexploded Ordnance Risk Assessment (12 January 2024) (doc. ref: DA17367c-01)
- Utilities Survey (dated 22 February 2023)
- UXB Clearance Surveys (16 June 2025) (doc. ref: 050836-9834-ZET-ZZZ-XX-SU-G-0001-S2-A4100)
- UXB Map of 3D Analytic Signal Amplitude (16 June 2025)
- UXB Map of Residual Magnetic Field Strength (16 June 2025)
- UXB Summary Interpretation Plan (16 June 2025)
- Home Office Suggested Manston Conditions Tracker (25 September 2025)
- Signed Letter of Agreement Highways Improvements Spitfire Way (27 March 2025)
- Manston Letter of Agreement 17 October 2025 for KCC Review
- Reptile Survey (15 October 2025) (doc. ref: 30/21-12A)
- Manston Clarifications Table with Home Office Responses (v2) (17 October 2025)
- Signed Letter of Agreement Highways Improvements Spitfire Way (05 December 2025) (with Appendices 1-4, for information purposes).



## **Appendix 3 EIA Screening**



Ministry of Housing,  
Communities &  
Local Government

Our Reference: PCU/EIASCR/Z2260/3369092  
Date: 28 July 2025

Dear Iain Leech

**Request for a Screening Direction**

**Town and Country Planning (Environmental Impact Assessment) Regulations 2017**  
**Application for retrospective planning consent for development comprising a temporary Initial Triage Processing Centre (ITPC) and to grant planning permission for new, proposed development to comprise the Manston Reception Centre (MRC) and a Training Facility at the former Royal Air Force (RAF) Manston, Manston Road, Ramsgate, Kent, CT12 5BS**

I refer to your request dated 26 June 2025, made under 6(10) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017(S.I. 2017/571) ("the 2017 Regulations") for the Secretary of State's screening direction on the matter of whether or not the above development is 'EIA development' within the meaning of the 2017 Regulations.

The above development falls within the description at paragraph 10(b) of Schedule 2 to the 2017. Therefore, the Secretary of State considers the proposal to be 'Schedule 2 development' within the meaning of the 2017 Regulations.

However, having taken into account the selection criteria in Schedule 3 to the 2017 Regulations the Secretary of State does not consider that the proposal is likely to have significant effects on the environment, see the attached written statement which gives the reasons for direction as required by 5(6) of the EIA Regulations.

Accordingly, in exercise of the powers conferred on her by regulation 7(5) of the 2017 Regulations the Secretary of State hereby directs that the proposed development described in your request and the documents submitted with it, **is not 'EIA development'** within the meaning of the 2017 Regulations.

Any permitted development rights which your client's proposal may enjoy under the Town and Country Planning (General Permitted Development) Order 2015 (SI 596) as amended are therefore unaffected.

You will bear in mind that the Secretary of State's opinion on the likelihood of the development having significant environmental effects is reached only for the purposes of this direction.

I am sending a copy of this letter and the written statement to Thanet District Council.

Yours sincerely,

*Planning Casework Unit*

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

## **Appendix 4 HRA**

# **Former RAF Manston Habitat Regulations Assessment Screening**

Ministry of Housing, Communities and Local Government  
(MHCLG)

14 January 2026

**LICHFIELDS**

68051/08/MS/NP  
40630462v1

# Contents

<b>1.0</b>	<b>Introduction</b>	<b>1</b>
	Purpose of the Assessment	1
	Background	1
	The Site	2
	Surroundings	3
	The Proposed Development	3
	Requirements of the Habitat Regulations	5
<b>2.0</b>	<b>Methodology</b>	<b>7</b>
	HRA Screening and Scope	7
	Test of Likely Significant Effects (LSEs)	7
<b>3.0</b>	<b>Assessment</b>	<b>8</b>
	European sites	8
	Other Plans and Projects	27
<b>4.0</b>	<b>Conclusions</b>	<b>29</b>

## Tables

Table 3.1 European Sites	9
Table 1.2 Assessment of LSE of the Proposed Development on Thanet Coast and Sandwich Bay SPA	13
Table 1.3 Assessment of LSE of the Proposed Development on Thanet Coast and Sandwich Bay Ramsar site	16
Table 1.4 Assessment of LSE of the Proposed Development on Sandwich Bay SAC	18
Table 1.5 Assessment of LSE of the Proposed Development on Thanet Coast SAC	20
Table 1.6 Assessment of LSE of the Proposed Development on Margate and Long Sands SAC	22
Table 1.7 Assessment of LSE of the Proposed Development on Outer Thames Estuary SPA	24





## 1.0 Introduction

### Purpose of the Assessment

- 1.1 Lichfields has been instructed by the Ministry of Housing, Communities and Local Government (MHCLG) to prepare a Habitat Regulations Screening Assessment in relation to an existing temporary Initial Triage Processing Centre ('ITPC'), a temporary training facility and modular buildings for processing, and permanent Manston Reception Centre ('MRC') and training facility (together the 'Proposed Development') at the former Royal Air Force (RAF) Manston, Manston Road, Ramsgate, Kent, CT12 5BS (the 'Site'). Planning permission for the Proposed Development is being sought via the Urgent Crown Development route introduced through the Levelling Up and Regeneration Act 2023.
- 1.2 The Site location and indicative boundary is illustrated in Figure 1 in Appendix A of this report, and the environmental context of the area surrounding the Site is illustrated in Figure 2 in Appendix A.

### Background

- 1.3 The Home Office took over ownership of the Site in December 2021. Due to the pressing need, and in anticipation of increased numbers of migrants ('Asylum Seekers') arriving throughout 2022 and beyond, the Home Office set up a temporary ITPC at the Site in December 2021 - a secure facility, comprising marquees and existing repurposed buildings, while the design of a future new facility was developed. The temporary ITPC provides a secure facility that holds Asylum Seekers for short periods while security and identity checks are completed, and the validity of their asylum claim determined. Without an additional ITPC, the established processing centres around the United Kingdom (UK) were predicted to have severe capacity issues.
- 1.4 Converting the temporary ITPC to a new facility is needed to provide improved and effective operations capable of dealing with an increase of Asylum Seekers safely, legally, and humanely. The overarching objective is to transform the Site into a fit for purpose, adequately sized and capable reception centre for the reception and processing of people who arrive in the UK illegally as well as the provision of interview facilities, ancillary offices and support facilities. The Site will also provide a temporary training facility, to serve the training needs of Immigration and Enforcement and Border Force staff across Home Office operational commands. The temporary training facility would be replaced by the long-term training facility and in the same location
- 1.5 Due to the significant speed at which the temporary ITPC had to be set up on-site, resourcing issues and uncertainty around the future requirements of the Site given unprecedented migrant arrivals through 2021 and 2022, the Home Office has not been able to seek planning permission for the continued use of the Site until now.

- 1.6 It is proposed to seek planning permission via the Urgent Crown Development route, pursuant to section 293B of the Town and Country Planning Act 1990<sup>1</sup>, due to the national importance of the proposals, which are critical to matters of national and border security. The purpose of seeking planning permission by way of the Urgent Crown Development Route is to enable the Home Office to expedite securing planning permission to regularise the existing use of the Site as a temporary ITPC that has been operating since December 2021 and to secure permission for a new Reception Centre and Training Facility.
- 1.7 Under the Habitat Regulations, planning permission cannot be granted if the Proposed Development would 'adversely affect the integrity' of a European Site or European offshore marine site. In taking the decision the Secretary of State must first consider and decide whether, the Proposed Development is 'likely to have a significant effect on a European site or a European offshore marine site'. This is determined through the HRA Screening process. Only if he concludes that this is the case (with no risk of significant effects) can permission be granted without carrying out a full Appropriate Assessment.

## **The Site**

- 1.8 The Site measures approximately 37.6 hectares (ha) in area and is located immediately northeast of Manston Road (B2050), on the Isle of Thanet in Kent. The Site is located within the administrative area of Thanet District Council (TDC).
- 1.9 The Site was previously in use by the RAF and latterly by the Fire Service Training Establishment for the Ministry of Defence (MOD) and an Army Reserve Unit and Air Cadet Squadron from 2017 until 2021.
- 1.10 The Home Office took over ownership of the Site in December 2021 and set up a ITPC in December 2021. At the time the ITPC was set up, the Site had a total of 16 buildings/building groups were demolished during Phase 1 demolition works, leaving 89 buildings/structures on the Site. Some of the existing buildings on the Site have been used for overnight residential accommodation known as Residential Holding Rooms ('RHRs'), medical centre, interview suite, security base and a training facility.
- 1.11 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 southwest corner of the Site fronting Manston Road and set within mature gardens is the former Commandant's House.
- 1.12 The main entrance to the Site is off Manston Road; there are three secondary accesses - two to the northeast of the main access and, another in the northwest corner of the Site adjacent to the former Fire Control Building

---

<sup>1</sup> UK Parliament (1990). 'Town and County Planning Act'

## Surroundings

- 1.13 The RAF Manston History Museum and Spitfire and Hurricane Memorial Museum are located to the immediate southeast and the Charles River Laboratories is located to the immediate east of the Site. To the north are agricultural properties and farmland.
- 1.14 The former RAF airfield (Manston Airport) is located approximately 20m south of the Site and a residential estate and discrete business are located approximately 15m west of the Site, beyond Manston Road.
- 1.15 The wider landscape is largely agricultural land with the urban areas of Margate and Ramsgate located approximately 3.5km northeast and 5km southeast of the Site.

## The Proposed Development

- 1.16 The Proposed Development comprises the retrospective development of the Site as an operational ITPC and the future development of the Site as a MRC and Training Facility.
- 1.17 The description of development is as follows:

### “Retrospective Development”\*

*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.*

\*N.B retrospective development comprises all new development that has occurred at the site since the HO took occupation in December 2021, up to March 2025.

### 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 buildings 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.*

- 1.18 The proposed development includes training facilities for Border Force and Immigration Enforcement Teams, comprising a temporary facility with six marquees, containing a mix of classrooms and physical training rooms along with three aircraft fuselages and vehicles simulators to assist Home Office staff training. The temporary training facility would have the capability to accommodate 100 trainers and trainees at any one time. The temporary facility will be replaced by a permanent training facility comprising a mix of classrooms, training rooms, an area the vehicle simulators and ancillary facilities. The permanent training facility will accommodate a maximum of 144 staff, including those providing the training and those being trained.

## Requirements of the Habitat Regulations

- 1.19 Regulation 70(1)(b) of the Conservation of Habitats and Species Regulations 2017<sup>2</sup> (“the Habitats Regulations”) applies the assessment provisions to the granting of planning permission on an application under Section 293B of the Town and Country Planning Act 1990 (urgent Crown development).
- 1.20 Regulation 63 of the Habitats Regulations requires the competent authority, in this case the Secretary of State for Housing, Communities and Local Government (SSHCLG):
- “before deciding to undertake, or give any consent, permission or other authorisation for, a plan or project which:*
- (a) 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*
- (b) 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.”*
- 1.21 For the purpose of this screening assessment, the Proposed Development is considered to be a project.
- 1.22 Under Regulation 63(5) of the Habitats Regulations where likely significant effects are identified, the competent authority may agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site or the European offshore marine site (as relevant). It should be noted that these sites formerly known as Natura 2000 sites are now part of the National Sites Network since the UK withdrawal from the EU. The following designations are relevant to the assessment:
- 1 **Special Protection Areas (SPA).** An SPA is a designation under the European Union Directive on the Conservation of Wild Birds. Under the Directive, Member States of the European Union (EU) have a duty to safeguard the habitats of migratory birds and certain particular threatened birds;
  - 2 **Special Areas of Conservation (SAC).** A designation under the EU Habitats Directive (92/43/EEC) to protect certain natural habitats (European sites) and fauna and flora (European species) that are considered to be under serious threat;
  - 3 **Ramsar Sites.** Wetlands of international importance designated under the Ramsar Convention. Sites proposed for selection are advised by the relevant statutory nature conservation body (or bodies) within the UK, or the relevant administration within each Overseas Territory or Crown Dependency; and
  - 4 Areas secured as sites compensating for damage to a European site.
- 1.23 When determining if likely significant effects or adverse effects on the integrity of a site would arise, conclusions must adhere with the precautionary principle.

---

<sup>2</sup> The Conservation of Habitats and Species Regulations 2017 (S.I. 2017/1012)

- 1.24 Effects can only be excluded where there is objective evidence that they would not arise as the result of a plan or project either alone or in combination with other projects.
- 1.25 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. However, approval may only be granted where it can be demonstrated that there are no adverse effects on the integrity of a site protected under the Habitats Regulations.
- 1.26 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).

## 2.0 Methodology

### HRA Screening and Scope

- 2.1 The HRA process applies the 'Precautionary Principle' to European sites. Plans and projects can only be permitted having ascertained that there will be no adverse effect on the integrity of the European site(s) in question.
- 2.2 The HRA screening stage initially involves gathering information on the European sites that may be affected, through geographical proximity or a potential impact pathway which links the plan to an effect on a European site.
- 2.3 There is no guidance or legislation that definitively dictates the physical scope of an HRA in all circumstances, since the potential distance at which an impact can arise depends on the proposal, the sensitivity of European sites and the presence of a linking impact pathway for harm such as noise or direct habitat loss. For the purpose of the assessment, a 10km zone around the Site is considered appropriate based on similar projects which comprise large numbers of dwellings on a single site.
- 2.4 No consultation has been undertaken with Natural England as part of this HRA Screening assessment process. Under the Habitat Regulations, consultation with Natural England is required only at the Appropriate Assessment stage.

### Test of Likely Significant Effects (LSEs)

- 2.5 The next stage of the HRA Screening assessment is to consider whether the Proposed Development is likely to result in a significant effect upon European sites (where identified), either alone or in combination with other projects and plans, through the test of likely significant effect.
- 2.6 Measures which have been specifically added to achieve the purpose of avoiding or reducing the harmful effects of a plan upon a European site, known as mitigation measures, will not be considered at the screening stage. This is pursuant to relevant case law governing assessments of this nature (Case C-323/17 'People Over Wind').
- 2.7 If the HRA screening concludes that there is no risk of significant effects on a European site, then further assessment is deemed unnecessary. However, if it is found that the plan would possibly have a likely significant effect on a European site then the next stage of assessment, known as the Appropriate Assessment stage, is required.

## 3.0 **Assessment**

### **European sites**

- 3.1 In order to determine whether the Proposed Development is likely to result in a significant effect upon a European site, it is first necessary to identify those European sites which may be affected by the Proposed Development. Table 3.1 below sets the nearest European sites to the Site. These are also shown on Figure 2 in Appendix A. The European sites have been identified using the Multi-Agency Information for the Countryside (MAGIC) map online resource<sup>3</sup> and details of each European site have been obtained from the Joint Nature Conservation Committee (JNCC) website<sup>4</sup>.
- 3.2 As detailed in Table 3.1, and shown on Figure 2 in Appendix A, the nearest European sites to the Site are Thanet Coast & Sandwich Bay SPA and Thanet Coast and Sandwich Bay Ramsar site, located approximately 2.97km to the southeast of the Site.
- 3.3 No other European site is located within 10km of the Proposed Development.
- 3.4 The function of the screening stage is to determine whether the Proposed Development could result in a likely significant effect (LSE) and whether Appropriate Assessment (AA) is required. A screening assessment for LSE of the Proposed Development on each of the European sites listed in Table 3.1 above has been undertaken and is presented in Tables 3.2 to 3.7 below.
- 3.5 The assessment outlined in Tables 3.2 to 3.7 has identified that there would be no LSEs associated with the Proposed Development on any of the European sites identified.

---

<sup>3</sup> <https://magic.defra.gov.uk>

<sup>4</sup> <https://jncc.gov.uk>



Table 3.1 European Sites

European site	Protected/Site qualifying Features	Conservation Objectives	Approximate Distance and Direction from the Site
<p>Thanet Coast &amp; Sandwich Bay SPA</p> <p>SPA Code: UK9012071</p> <p>Area: 1880.85ha</p> <p>Habitats present include chalk cliff, rocky shore, shingle, sand and mudflats, saltmarsh and sand dunes. As well as breeding and wintering birds, the site supports communities of terrestrial and marine plant species and rare invertebrate species.</p>	<p>Qualifying under Article 4.1:</p> <ul style="list-style-type: none"> <li>- A195 <i>Sterna albifrons</i> Little tern (Breeding).</li> <li>- A140 <i>Pluvialis apricaria</i>; European golden plover (Non-breeding).</li> </ul> <p>Qualifying under Article 4.2:</p> <ul style="list-style-type: none"> <li>- A169 <i>Arenaria interpres</i>; Ruddy turnstone (Non-breeding).</li> </ul>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive by maintaining or restoring;</p> <ul style="list-style-type: none"> <li>- The extent and distribution of the habitats of the qualifying features</li> <li>- The structure and function of the habitats of the qualifying features</li> <li>- The supporting processes on which the habitats of the qualifying features rely</li> <li>- The population of each of the qualifying features, and,</li> <li>- The distribution of the qualifying features within the site.</li> </ul>	<p><b>2.97km</b> to the southeast of the Site</p>
<p>Thanet Coast &amp; Sandwich Bay Ramsar site</p> <p>Area: 2,183ha</p> <p>A coastal site, consisting of a long stretch of rocky shore, adjoining areas of estuary, sand dune, maritime grassland, saltmarsh and grazing marsh.</p>	<p>Ramsar Criterion 2 Supports 15 British Red Data Book wetland invertebrates</p> <p>Ramsar Criterion 6 – species/populations occurring at levels of international importance. Species with peak counts in winter: <i>Arenaria interpres</i>; Ruddy turnstone</p> <p>Relevant Wetland types -</p>	<p>There are no conservation objectives for Ramsar Sites</p>	<p><b>2.97km</b> to the southeast of the Site</p>

European site	Protected/Site qualifying Features	Conservation Objectives	Approximate Distance and Direction from the Site
	<p>Inland wetland, Marine/coastal wetland:</p> <ul style="list-style-type: none"> <li>- Tidal Flats</li> <li>- Rocky shores</li> <li>- Seasonally flooded agricultural land</li> <li>- Rivers/streams/creeks: permanent</li> <li>- Freshwater, tree-dominated wetlands</li> <li>- Sand/shingle shores (including dune systems)</li> <li>- Estuarine waters</li> <li>- Freshwater marshes/pools: permanent</li> <li>- Salt marshes</li> </ul>		
<p>Sandwich Bay SAC</p> <p>SAC EU Code: UK0013077</p> <p>Area: 1136.7ha</p> <p>General Site Character:</p> <ul style="list-style-type: none"> <li>- Tidal rivers, Estuaries, Mud flats, Sand flats, Lagoons (including saltwork basins) (32%)</li> <li>- Salt marshes, Salt pastures, Salt steppes (15%)</li> <li>- Coastal sand dunes, Sand beaches, Machair (35%)</li> <li>- Inland water bodies (Standing water, Running water) (1%)</li> </ul>	<p>Annex 1 habitats that are a primary reason for selection of the site:</p> <ul style="list-style-type: none"> <li>- 2110 Embryonic shifting dunes</li> <li>- 2120 "Shifting dunes along the shoreline with <i>Ammophila arenaria</i> ("white dunes")"</li> <li>- 2130 "Fixed coastal dunes with herbaceous vegetation ("grey dunes")"</li> <li>- 2170 Dunes with <i>Salix repens</i> ssp. <i>argentea</i> (<i>Salicion arenariae</i>)</li> </ul> <p>Annex 1 habitats present as a qualifying feature, but not a primary reason for selection of this site:</p> <ul style="list-style-type: none"> <li>- 2190 Humid dune slacks</li> </ul>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;</p> <ul style="list-style-type: none"> <li>- The extent and distribution of qualifying natural habitats;</li> <li>- The structure and function (including typical species) of qualifying natural habitats, and;</li> <li>- The supporting processes on which qualifying natural habitats rely.</li> </ul>	<p><b>2.97km</b> to the southeast of the Site</p>

European site	Protected/Site qualifying Features	Conservation Objectives	Approximate Distance and Direction from the Site
<ul style="list-style-type: none"> <li>- Bogs, Marshes, Water fringed vegetation, Fens (1%)</li> <li>- Humid grassland, Mesophile grassland (5%)</li> <li>- Improved grassland (10%)</li> <li>- Coniferous woodland (1%)</li> </ul>			
<p>Thanet Coast SAC</p> <p>SAC EU Code: UK0013107</p> <p>Area: 2815.95ha</p> <p>General Site Character:</p> <ul style="list-style-type: none"> <li>- Marine areas, Sea inlets (87%)</li> <li>- Tidal rivers, Estuaries, Mud flats, Sand flats, Lagoons (including saltwork basins) (10%)</li> <li>- Shingle, Sea cliffs, Islets (3%)</li> </ul>	<p>Annex 1 habitats that are a primary reason for selection of the site:</p> <ul style="list-style-type: none"> <li>- 1170 Reefs</li> <li>- 8330 Submerged or partially submerged sea caves</li> </ul>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;</p> <ul style="list-style-type: none"> <li>- The extent and distribution of qualifying natural habitats</li> <li>- The structure and function (including typical species) of qualifying natural habitats; and</li> <li>- The supporting processes on which qualifying natural habitats rely</li> </ul>	<b>3.30km</b> to the north of the Site
<p>Margate and Long Sands SAC</p> <p>SAC EU Code: UK0030371</p> <p>Area: 64876.85ha</p> <p>General Site Character:</p> <ul style="list-style-type: none"> <li>- Marine areas, Sea inlets (100%)</li> </ul>	<p>Annex 1 habitats that are a primary reason for selection of the site:</p> <ul style="list-style-type: none"> <li>- 1110 Sandbanks which are slightly covered by sea water all the time</li> </ul>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;</p> <ul style="list-style-type: none"> <li>- The extent and distribution of qualifying natural habitats;</li> <li>- The structure and function (including typical species) of qualifying natural habitats, and</li> </ul>	<b>3.60km</b> to the north of the Site

European site	Protected/Site qualifying Features	Conservation Objectives	Approximate Distance and Direction from the Site
		- The supporting processes on which qualifying natural habitats rely.	
<p>Outer Thames Estuary SPA</p> <p>SPA Code: UK9020309</p> <p>Area: 392451.66ha</p> <p>Classified for the protection of the largest aggregation of wintering red-throated diver (<i>Gavia stellata</i>) in the UK, an estimated population of 6,466 individuals, which is 38% of the wintering population of Great Britain. It also protects foraging areas for common tern (<i>Sterna hirundo</i>) and little tern (<i>Sternula albifrons</i>) during the breeding season.</p>	<ul style="list-style-type: none"> <li>- A001 <i>Gavia stellata</i>; Red-throated diver (Breeding).</li> <li>- A195 <i>Sterna Hirundo</i>; Common tern (Breeding).</li> <li>- A193 <i>Sternula albifrons</i>; Little tern (Breeding).</li> </ul>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;</p> <ul style="list-style-type: none"> <li>- The extent and distribution of the habitats of the qualifying features;</li> <li>- The structure and function of the habitats of the qualifying features;</li> <li>-The supporting processes on which the habitats of the qualifying features rely;</li> <li>-The population of each of the qualifying features; and,</li> <li>- The distribution of the qualifying features within the site.</li> </ul>	<p><b>3.60km</b> to the north of the Site</p>

Source: Magic.DEFRA.Gov.UK and JNCC.Gov.UK

Table 1.2 Assessment of LSE of the Proposed Development on Thanet Coast and Sandwich Bay SPA

Protected/Site qualifying Features	Conservation Objectives	Impact Factor (Retrospective and Proposed Development)	Potential LSE?
<p>Qualifying under Article 4.1:</p> <ul style="list-style-type: none"> <li>- A195 <i>Sterna albifrons</i> Little tern (Breeding).</li> <li>- A140 <i>Pluvialis apricaria</i>; European golden plover (Non-breeding).</li> </ul> <p>Qualifying under Article 4.2:</p> <ul style="list-style-type: none"> <li>- A169 <i>Arenaria interpres</i>; Ruddy turnstone (Non-breeding).</li> </ul>	<ul style="list-style-type: none"> <li>- The extent and distribution of the habitats of the qualifying features</li> <li>- The structure and function of the habitats of the qualifying features</li> <li>- The supporting processes on which the habitats of the qualifying features rely</li> <li>- The population of each of the qualifying features, and,</li> <li>- The distribution of the qualifying features within the site.</li> </ul>	Direct habitat loss of qualifying features as a result of construction works.	<p>Construction works undertaken to date as part of the existing ITPC and proposed development of the MRC and training facility will be confined to the Site.</p> <p>As noted above, habitat loss on the Site to date has been relatively limited, comprising the removal of the majority of a tree group and a common ash tree, and other shrubs from the perimeter of the Site. Minor areas of 'neutral grassland' have also been removed for the construction of the STHU. Habitat loss during construction of the proposed development will be minimised as far as practicable.</p> <p>Overall, the habitat loss on the Site as a result of the Proposed Development will not be significant. The habitat is also not considered suitable habitat for the European site qualifying features (Little tern, European golden plover and Ruddy turnstone).</p> <p>Little tern is a coastal species and utilises habitats mainly from coastal and offshore waters. Habitat for European golden plover is primarily intertidal, wetland and arable land meaning no loss of suitable habitat for golden plover is anticipated. Ruddy Turnstones are also a coastal species and typically forage and breed along the coast.</p> <p>Given that the Site is located inland, approximately 2.97km from the SPA, there is no potential for disturbance of the qualifying features during construction and there would be no direct loss of habitat which is used by the qualifying features.</p>
		Impacts to qualifying features due to air and noise emissions during construction (including	As above, construction works undertaken to date as part of the existing ITPC and proposed development of the MRC and training facility will be confined to the Site.

Protected/Site qualifying Features	Conservation Objectives	Impact Factor (Retrospective and Proposed Development)	Potential LSE?
		from vehicle movements and plant and machinery) and from vehicle emissions during operation.	<p>There will be some air and noise emissions due to construction and operational vehicles and plant and machinery during construction however any potential effects are considered relevant to receptors on and in close proximity to the Site only. It should be noted that the Air Quality and Noise Assessment prepared for the planning submission have not identified any significant effects on identified receptors during construction and operation.</p> <p>The Air Quality Assessment also reports on the assessment of potential air quality impacts within the Sandwich Bay to Hacklinge Marshes SSSI (for which parts are also designated as the Thanet Coast and Sandwich Bay SPA). This sensitive ecological receptor is located within 200m of the road network used to transport service users from the Home Office facility in Dover Western Docks to the Proposed Development. The Air Quality Assessment reports that the effect of changes in road traffic emissions on air quality as a result of the operation of the Proposed Development is considered Negligible (Not significant) at all ecological receptors.</p> <p>Overall, given the distance from the Site to the SPA (2.97km) and intervening land use, there would be no significant effects on the qualifying features of the SPA from air and noise emissions during construction and operation.</p>
		Impacts from release of contaminants during construction (through potential contamination pathways) and during operational works from fuel, oils and cleaning chemicals.	<p>Construction works (groundbreaking activities) undertaken to date have been limited in size and no pollution pathways to controlled waters have been created as a result of the works. During construction of the proposed development (MRC and Training Facility), an outline remediation strategy will be developed to appropriately manage the risk of contamination.</p> <p>The nature of the operational development is considered to be low risk for contaminating the underlying soils, and</p>

Protected/Site qualifying Features	Conservation Objectives	Impact Factor (Retrospective and Proposed Development)	Potential LSE?
			potentially the groundwater if a viable pathway exists. All fuel, oils and cleaning chemicals would be appropriately stored on the Site during operation. There would be no impacts on Site qualifying features from contamination during construction or operation.
		Impacts from waste/foul water discharge during construction and operation.	Waste /foul water discharge from the Site is via the Southern Water sewer that runs through the Site and connects to existing Margate and Broadstairs wastewater treatment infrastructure. There is no hydrological connectivity from the Site to the SPA.
		Impacts to qualifying features due to noise emissions from site users during operation.	Given the distance from the Site to the SPA (2.97km) and intervening land use, there would be no significant effects on the qualifying features of the SPA from noise emissions during operation.
		Impacts to qualifying features from artificial lighting during construction and operation.	Given the distance between the Site and the qualifying features within the SPA, Artificial lighting during construction and operation will not reach the features and therefore no credible impact pathway exists.

Table 1.3 Assessment of LSE of the Proposed Development on Thanet Coast and Sandwich Bay Ramsar site

Protected/Site qualifying Features	Conservation Objectives	Impact Factor (Retrospective and Proposed Development)	Potential LSE?
<p>Ramsar Criterion 2 Supports 15 British Red Data Book wetland invertebrates</p> <p>Ramsar Criterion 6 – species/populations occurring at levels of international importance. Species with peak counts in winter: <i>Arenaria interpres</i>; Ruddy turnstone</p> <p>Relevant Wetland types -</p> <p>Inland wetland, Marine/coastal wetland:</p> <ul style="list-style-type: none"> <li>- Tidal Flats</li> <li>- Rocky shores</li> <li>- Seasonally flooded agricultural land</li> <li>- Rivers/streams/creeks: permanent</li> <li>- Freshwater, tree-dominated wetlands</li> <li>- Sand / shingle shores (including dune systems)</li> <li>- Estuarine waters</li> <li>- Freshwater marshes/pools: permanent</li> <li>- Salt marshes</li> </ul>	There are no conservation objectives for Ramsar Sites	Direct habitat loss of qualifying features as a result of construction works.	<p>Construction works undertaken to date as part of the existing ITPC and proposed development of the MRC and training facility will be confined to the Site.</p> <p>As noted above, habitat loss on the Site to date has been relatively limited, comprising the removal of the majority of a tree group and a common ash tree, and other shrubs from the perimeter of the Site. Minor areas of 'neutral grassland' have also been removed for the construction of the STHU. Habitat loss during construction of the proposed development will be minimised as far as practicable.</p> <p>Overall, the habitat loss on the Site as a result of the Proposed Development will not be significant. The habitat is also not considered suitable habitat for the site qualifying features (wetland invertebrates and Ruddy turnstone).</p> <p>Given that the Site is located inland, approximately 2.97km from the Ramsar site, there is no potential for disturbance of the site qualifying features during construction and no direct loss of habitat which is used by the qualifying features.</p>
		Impacts to qualifying features due to air and noise emissions during construction (including from vehicle movements and plant and machinery) and from vehicle emissions during operation.	As above, construction works undertaken to date as part of the existing ITPC and proposed development of the MRC and training facility will be confined to the Site. There will be some air and noise emissions due to construction and operational vehicles and plant and machinery during construction however any potential effects are considered relevant to receptors on and in close proximity to the Site only. It should also be noted that the Air Quality and Noise Assessment prepared for the planning submission have not identified any significant effects on identified receptors during construction and operation.



Protected/Site qualifying Features	Conservation Objectives	Impact Factor (Retrospective and Proposed Development)	Potential LSE?
			Overall, given the distance from the Site to the Ramsar site (2.97km) and intervening land use, there would be no significant effects on the qualifying features of the Ramsar site from air and noise emissions during construction and operation.
		Impacts from release of contaminants during construction (through potential contamination pathways) and during operational works from fuel, oils and cleaning chemicals.	<p>Construction works (groundbreaking activities) undertaken to date have been limited in size and no pollution pathways to controlled waters have been created as a result of the works. During construction of the proposed development (MRC and Training Facility), an outline remediation strategy will be developed to appropriately manage the risk of contamination.</p> <p>The nature of the operational development is considered to be low risk for contaminating the underlying soils, and potentially the groundwater if a viable pathway exists. All fuel, oils and cleaning chemicals would be appropriately stored on the Site during operation. There would be no impacts on Site qualifying features from the release of contamination during construction or operation.</p>
		Impacts from waste/foul water discharge during construction and operation.	Waste /foul water discharge from the Site is via the Southern Water sewer that runs through the Site and connects to existing Margate and Broadstairs wastewater treatment infrastructure. There is no hydrological connectivity from the Site to the Ramsar site.
		Impacts to qualifying features due to noise emissions from operation traffic and site users during operation.	Given the distance from the Site to the Ramsar site (2.97km) and intervening land use, there would be no significant effects on the qualifying features of the Ramsar site from noise emissions during operation.
		Impacts to qualifying features from artificial lighting during construction and operation.	Given the distance between the Site and the qualifying features within the Ramsar site, Artificial lighting during construction and operation will not reach the features and therefore no credible impact pathway exists.

Table 1.4 Assessment of LSE of the Proposed Development on Sandwich Bay SAC

Protected/Site qualifying Features	Conservation Objectives	Impact Factor (Retrospective and Proposed Development)	Potential LSE?
<p>Annex 1 habitats that are a primary reason for selection of the site:</p> <ul style="list-style-type: none"> <li>- 2110 Embryonic shifting dunes</li> <li>- 2120 "Shifting dunes along the shoreline with <i>Ammophila arenaria</i> ("white dunes")"</li> <li>- 2130 "Fixed coastal dunes with herbaceous vegetation ("grey dunes")"</li> <li>- 2170 Dunes with <i>Salix repens</i> ssp. <i>argentea</i> (<i>Salicion arenariae</i>)</li> </ul> <p>Annex 1 habitats present as a qualifying feature, but not a primary reason for selection of this site:</p> <ul style="list-style-type: none"> <li>- 2190 Humid dune slacks</li> </ul>	<p>- The extent and distribution of qualifying natural habitats;</p> <p>-The structure and function (including typical species) of qualifying natural habitats, and;</p> <p>-The supporting processes on which qualifying natural habitats rely.</p>	Direct habitat loss as a result of construction works.	<p>Construction works undertaken to date as part of the existing ITPC and proposed development of the MRC and training facility will be confined to the Site.</p> <p>Given that the Site is located inland, approximately 2.97km from the SAC, there is no potential for disturbance of the site qualifying features (Annex 1 habitats) during construction.</p>
		Impacts to qualifying features due to air and noise emissions during construction (including from vehicle movements and plant and machinery) and from vehicle emissions during operation.	<p>There will be some air and noise emissions due to construction and operational vehicles and plant and machinery during construction however any potential effects are considered relevant to receptors on and in close proximity to the Site only. As noted above, the Air Quality and Noise Assessment prepared for the planning submission have not identified any significant effects on identified receptors during construction and operation.</p> <p>The Air Quality Assessment also reports on the assessment of potential air quality impacts within the Sandwich Bay to Hackling Marshes SSSI (for which parts are also designated as the Sandwich Bay SAC). This sensitive ecological receptor is located within 200m of the road network used to transport Asylum Seekers from the Home Office facility in Dover Western Docks to the Proposed Development. The Air Quality Assessment reports 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.</p> <p>Overall, given the distance from the Site to the SAC (2.97km) and intervening land use, there would be no significant effects on the qualifying features of the SAC from air and noise emissions during construction and operation.</p>

Protected/Site qualifying Features	Conservation Objectives	Impact Factor (Retrospective and Proposed Development)	Potential LSE?
		Impacts from release of contaminants during construction (through potential contamination pathways) and during operational works from fuel, oils and cleaning chemicals.	<p>Construction works (groundbreaking activities) undertaken to date have been limited in size and no pollution pathways to controlled waters have been created as a result of the works. During construction of the proposed development (MRC and Training Facility), an outline remediation strategy will be developed to appropriately manage the risk of contamination.</p> <p>The nature of the operational development is considered to be low risk for contaminating the underlying soils, and potentially the groundwater if a viable pathway exists. All fuel, oils and cleaning chemicals would be appropriately stored on the Site during operation.</p> <p>There would be no impacts on the Site qualifying features (Annex 1 habitats) from release of contaminants during construction or operation.</p>
		Impacts from waste/foul water discharge during construction and operation.	<p>Waste /foul water discharge from the Site is via the Southern Water sewer that runs through the Site and connects to existing Margate and Broadstairs wastewater treatment infrastructure. There is no hydrological connectivity from the Site to the SAC.</p>
		Impacts to qualifying features due to noise emissions from operation traffic and site users during operation.	<p>Given the distance from the Site to the SAC (2.97km) and intervening land use, there would be no significant effects on the qualifying features of the SAC from noise emissions during operation.</p>
		Impacts to qualifying features from artificial lighting during construction and operation.	<p>Given the distance between the Site and the qualifying features within the SAC, Artificial lighting during construction and operation will not reach the features and therefore no credible impact pathway exists.</p>

Table 1.5 Assessment of LSE of the Proposed Development on Thanet Coast SAC

Protected/Site qualifying Features	Conservation Objectives	Impact Factor (Retrospective and Proposed Development)	Potential LSE?
<p>Annex 1 habitats that are a primary reason for selection of the site:</p> <ul style="list-style-type: none"> <li>- 1170 Reefs</li> <li>- 8330 Submerged or partially submerged sea caves</li> </ul>	<ul style="list-style-type: none"> <li>- The extent and distribution of qualifying natural habitats</li> <li>- The structure and function (including typical species) of qualifying natural habitats; and</li> <li>- The supporting processes on which qualifying natural habitats rely</li> </ul>	Direct habitat loss as a result of construction works.	<p>Construction works undertaken to date as part of the existing ITPC and proposed development of the MRC and training facility will be confined to the Site.</p> <p>Given that the Site is located inland, approximately 3.30km from the SAC, with inventing land uses, there is no potential for disturbance of the site qualifying features (reefs and submerged or partially submerged sea caves) during construction.</p>
		Impacts to qualifying features due to air and noise emissions during construction (including from vehicle movements and plant and machinery) and from vehicle emissions during operation.	<p>There will be some air and noise emissions due to construction and operational vehicles and plant and machinery during construction however any potential effects are considered relevant to receptors on and in close proximity to the Site only.</p> <p>Overall, given the distance from the Site to the SAC (3.30km) and intervening land use, there would be no significant effects on the qualifying features of the SAC from air and noise emissions during construction and operation.</p>
		Impacts from release of contaminants during construction (through potential contamination pathways) and during operational works from fuel, oils and cleaning chemicals.	<p>Construction works (groundbreaking activities) undertaken to date have been limited in size and no pollution pathways to controlled waters have been created as a result of the works. During construction of the proposed development (MRC and Training Facility), an outline remediation strategy will be developed to appropriately manage the risk of contamination.</p> <p>The nature of the operational development is considered to be low risk for contaminating the underlying soils, and potentially the groundwater if a viable pathway exists. All fuel, oils and cleaning chemicals would be appropriately stored on the Site during operation.</p>

Protected/Site qualifying Features	Conservation Objectives	Impact Factor (Retrospective and Proposed Development)	Potential LSE?
			There would be no impacts on Site qualifying features (Annex 1 habitats) from release of contaminants during construction or operation.
		Impacts from waste/foul water discharge during construction and operation.	Waste /foul water discharge from the Site is via the Southern Water sewer that runs through the Site and connects to existing Margate and Broadstairs wastewater treatment infrastructure. There is no hydrological connectivity from the Site to the SAC.
		Impacts to qualifying features due to noise emissions from operation traffic and site users during operation.	Given the distance from the Site to the SAC (3.30km) and intervening land use, there would be no significant effects on the qualifying features of the SAC from noise emissions during operation.
		Impacts to qualifying features from artificial lighting during construction and operation.	Given the distance between the Site and the qualifying features within the SAC, Artificial lighting during construction and operation will not reach the features and therefore no credible impact pathway exists.

Table 1.6 Assessment of LSE of the Proposed Development on Margate and Long Sands SAC

Protected/Site qualifying Features	Conservation Objectives	Impact Factor (Retrospective and Proposed Development)	Potential LSE?
<p>Annex 1 habitats that are a primary reason for selection of the site:</p> <ul style="list-style-type: none"> <li>- 1110 Sandbanks which are slightly covered by sea water all the time</li> </ul>	<ul style="list-style-type: none"> <li>- The extent and distribution of qualifying natural habitats;</li> <li>- The structure and function (including typical species) of qualifying natural habitats, and</li> <li>- The supporting processes on which qualifying natural habitats rely.</li> </ul>	Direct habitat loss as a result of construction works.	<p>Construction works undertaken to date as part of the existing ITPC and proposed development of the MRC and training facility will be confined to the Site.</p> <p>Given that the Site is located inland, approximately 3.60km from the SAC, with intervening land uses, there is no potential for disturbance of the site qualifying features (sandbanks) during construction.</p>
		Impacts to qualifying features due to air and noise emissions during construction (including from vehicle movements and plant and machinery) and from vehicle emissions during operation.	<p>There will be some air and noise emissions due to construction and operational vehicles from plant and machinery during construction however any potential effects are considered relevant to receptors on and in close proximity to the Site only.</p> <p>Overall, given the distance from the Site to the SAC (3.60km) and intervening land use, there would be no significant effects on the qualifying features of the SAC from air and noise emissions during construction and operation.</p>
		Impacts from release of contaminants during construction (through potential contamination pathways) and during operational works from fuel, oils and cleaning chemicals.	<p>Construction works (groundbreaking activities) undertaken to date have been limited in size and no pollution pathways to controlled waters have been created as a result of the works. During construction of the proposed development, an outline remediation strategy will be developed to appropriately manage the risk of contamination.</p> <p>The nature of the operational development is considered to be low risk for contaminating the underlying soils, and potentially the groundwater if a viable pathway exists. All fuel, oils and cleaning chemicals would be appropriately stored on the Site during operation.</p>

Protected/Site qualifying Features	Conservation Objectives	Impact Factor (Retrospective and Proposed Development)	Potential LSE?
			There would be no impacts on Site qualifying features (Annex 1 habitats) from release of contaminants during construction or operation.
		Impacts from waste/foul water discharge during construction and operation.	Waste /foul water discharge from the Site is via the Southern Water sewer that runs through the Site and connects to existing Margate and Broadstairs wastewater treatment infrastructure. There is no hydrological connectivity from the Site to the SAC.
		Impacts to qualifying features due to noise emissions from operation traffic and site users during operation.	Given the distance from the Site to the SAC (3.60km) and intervening land use, there would be no significant effects on the qualifying features of the SAC from noise emissions during operation.
		Impacts to qualifying features from artificial lighting during construction and operation.	Given the distance between the Site and the qualifying features within the SAC, Artificial lighting during construction and operation will not reach the features and therefore no credible impact pathway exists.

Table 1.7 Assessment of LSE of the Proposed Development on Outer Thames Estuary SPA

Protected/Site qualifying Features	Conservation Objectives	Impact Factor (Retrospective and Proposed Development)	Potential LSE?
<ul style="list-style-type: none"> <li>- A001 <i>Gavia stellata</i>; Red-throated diver (Breeding).</li> <li>- A195 <i>Sterna Hirundo</i>; Common tern (Breeding).</li> <li>- A193 <i>Sternula albifrons</i>; Little tern (Breeding).</li> </ul>	<ul style="list-style-type: none"> <li>- The extent and distribution of the habitats of the qualifying features;</li> <li>- The structure and function of the habitats of the qualifying features;</li> <li>-The supporting processes on which the habitats of the qualifying features rely;</li> <li>-The population of each of the qualifying features; and,</li> <li>- The distribution of the qualifying features within the site.</li> </ul>	Direct habitat loss of qualifying features as a result of construction works.	<p>Construction works undertaken to date as part of the existing ITPC and proposed development of the MRC and training facility will be confined to the Site.</p> <p>As previously noted, habitat loss on the Site to date has been relatively limited, comprising the removal of the majority of a tree group and a common ash tree, and other shrubs from the perimeter of the Site. Minor areas of 'neutral grassland' have also been removed for the construction of the STHU. Habitat loss during construction of the Proposed Development (MRC and Training Facility) will be minimised as far as practicable.</p> <p>Overall, the habitat loss on the Site as a result of the Proposed Development will not be significant. The habitat is also not considered suitable habitat for the site qualifying features (Red-throated diver, Common tern and Little tern).</p> <p>Red-throated diver are sea birds and do not forage or breed inland. The Site does not provide suitable foraging or breeding habitat for common tern (which breed along the south-east of England), and Little tern is a coastal species and utilises habitats mainly from coastal and offshore waters.</p> <p>Given that the Site is located inland, approximately 3.60km from the SPA, there is no potential for disturbance of the qualifying features during construction and there would be no direct loss of habitat which is used by the qualifying features.</p>
		Impacts to qualifying features due to air and noise emissions during construction (including from vehicle movements and	As above, construction works undertaken to date as part of the existing ITPC and proposed development of the MRC and training facility will be confined to the Site. There will be some air and noise emissions due to construction and



Protected/Site qualifying Features	Conservation Objectives	Impact Factor (Retrospective and Proposed Development)	Potential LSE?
		plant and machinery) and from vehicle emissions during operation.	<p>operational vehicles and plant and machinery during construction however any potential effects are considered relevant to receptors on and in close proximity to the Site only. It should be noted that the Air Quality and Noise Assessment prepared for the planning submission have not identified any significant effects on identified receptors during construction and operation.</p> <p>Overall, given the distance from the Site to the SPA (3.60km) and intervening land use, there would be no significant effects on the qualifying features of the SPA from air and noise emissions during construction and operation.</p>
		Impacts from release of contaminants during construction (through potential contamination pathways) and during operational works from fuel, oils and cleaning chemicals.	<p>Construction works (groundbreaking activities) undertaken to date have been limited in size and no pollution pathways to controlled waters have been created as a result of the works. During construction of the proposed development (MRC and Training Facility), an outline remediation strategy will be developed to appropriately manage the risk of contamination.</p> <p>The nature of the operational development is considered to be low risk for contaminating the underlying soils, and potentially the groundwater if a viable pathway exists. All fuel, oils and cleaning chemicals would be appropriately stored on the Site during operation.</p> <p>There would be no impacts on Site qualifying features of the SPA from contamination during construction or operation.</p>
		Impacts from waste/foul water discharge during construction and operation.	<p>Waste /foul water discharge from the Site is via the Southern Water sewer that runs through the Site and connects to existing Margate and Broadstairs wastewater treatment infrastructure. There is no hydrological connectivity from the Site to the SPA.</p>

Protected/Site qualifying Features	Conservation Objectives	Impact Factor (Retrospective and Proposed Development)	Potential LSE?
		Impacts to qualifying features due to noise emissions from operation traffic and site users during operation.	Given the distance from the Site to the SPA (3.60km) and intervening land use, there would be no significant effects on the qualifying features of the SPA from noise emissions during operation.
		Impacts to qualifying features from artificial lighting during construction and operation.	Given the distance between the Site and the qualifying features within the SPA, Artificial lighting during construction and operation will not reach the features and therefore no credible impact pathway exists.

## Other Plans and Projects

- 3.6 The Thanet District Local Plan<sup>5</sup> sets out policies and proposals that will be used to guide decisions and investment on development and regeneration over the period to 2031. The Thanet Local Plan, which was adopted in July 2020, seeks to deliver a housing requirement of 17,140 new homes over the 20-year period to 2031 and the Plan would be most likely to have a combination effect with the Proposed Development.
- 3.7 The Pre-Submission Thanet Local Plan was accompanied by a HRA which assessed the likely significant effects of the policies and site allocations within the Thanet area on identified European sites. The Assessment concluded various potential impacts associated with recreational impacts and impacts on functional land. This included the potential for turnstone using the Thanet Coast and Sandwich Bay SPA Thanet Coast and Sandwich Bay Ramsar site to be affected by increased disturbance due to recreational pressure and the potential for golden plover to be affected when using non-designated functional habitats outside the SPA boundary. A range of measures and recommendations were identified as a result of the assessment and incorporated where necessary within the Local Plan.
- 3.8 In terms of mitigation measures relating to recreational pressures, within the Local Plan the Council has included policy commitments to the Thanet Coast Strategic Access Management and Monitoring Plan (SAMM). The SAMM will include measures that have been successfully employed for other European sites, and which are considered both achievable and likely to be effective and can therefore be relied on to ensure that proposals coming forward under the Local Plan will not adversely affect site integrity. Additional provisions and masterplanning requirements are also included in policy, with allocation-specific measures such as the provision of greenspace that will help minimise effects on the European sites (Thanet Coast and Sandwich Bay SPA Thanet Coast and Sandwich Bay Ramsar site).
- 3.9 In terms of Functional Land, the mitigation within the Plan creates a policy structure whereby assessments for impacts on Golden Plover are specifically required for the various allocations as they are brought forward by developers, with a requirement for appropriate mitigation should likely significant effects be identified.
- 3.10 The conclusions of the HRA that accompanied the Pre-Submission Local Plan concluded that there will be no adverse effects on any European sites as a result of the Thanet District Council Plan, either alone or in combination with other plans and projects.
- 3.11 The conclusions of the assessment of the Local Plan are relevant for this Screening assessment as it relates to a consideration of the potential for new impacts when considered in combination or cumulatively with the various proposals and policies of the Local Plan. Given the outcome of the HRA, it is considered that there will be no likely effects on European sites in combination with other growth in Thanet.
- 3.12 A review of planning applications on the Thanet Planning Portal has also been undertaken to determine if any Projects (including Nationally Significant Infrastructure Projects (NSIPS) located in proximity to the Site could give rise to significant in-combination effects. An NSIP for the upgrade and reopening of Manston Airport to the southeast of the Site, is

---

<sup>5</sup> Thanet District Council (July 2020). Thanet District Council Local Plan.

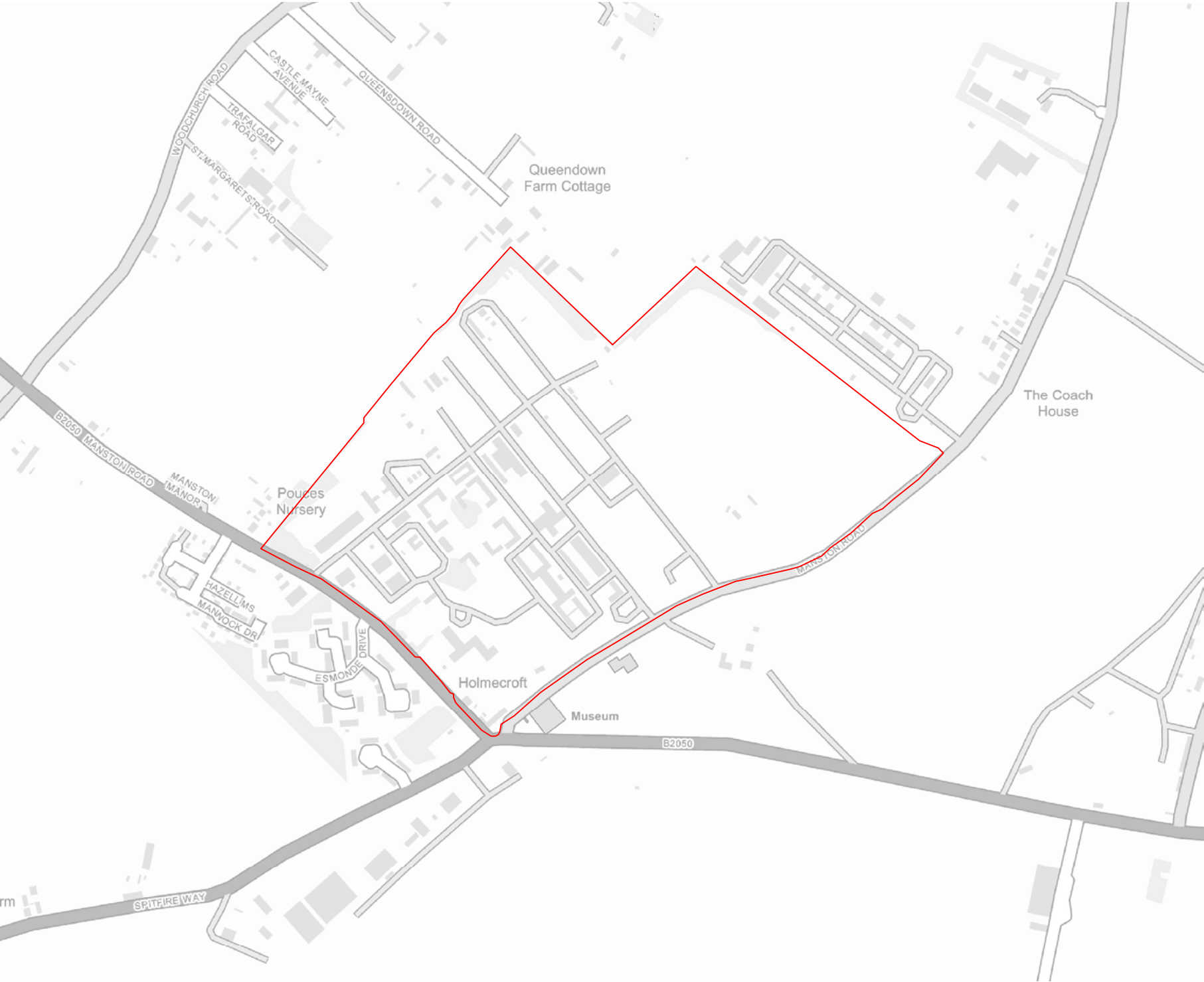
considered relevant. The project is for the reopening and development of Manston Airport into a dedicated air freight facility able to handle at least 10,000 air cargo movements per year whilst also offering passenger, executive travel, and aircraft engineering services. The Development Consent Order (DCO) for the project was approved in August 2022.

- 3.13 The DCO application for Manston Airport was accompanied by an HRA. Taking account of the nature, magnitude and scale of the proposals, along with the stated conservation objectives and known sensitivities of the habitats and species associated with the European sites identified, the HRA concluded that the proposals would result in no adverse effects on the integrity of these sites. Given the outcome of the HRA for the Manston Airport DCO, it is considered that there will be no likely effects on European sites in combination with the Proposed Development.

## **4.0 Conclusions**

- 4.1 The HRA Screening Assessment, with supporting plans within Appendix 1, has been prepared to consider if the proposals for an existing temporary Initial Triage Processing Centre and new development comprising the Manston Reception Centre and a training facility at RAF Manston are likely to result in a significant effect upon European sites (where identified), either alone or in combination with other projects and plans. The precautionary principle has been adopted.
- 4.2 The Assessment has determined that there would be no Likely Significant Effects associated with the Proposed Development on any of the European sites identified.
- 4.3 Consideration of the HRA prepared for the Thanet Local Plan has identified that no likely significant effects on any European sites was anticipated for plans and allocations emerging in the area. When considered in combination with proposals at RAF Manston, it is therefore concluded that no likely significant effects on any designated sites would occur. Consideration of the HRA prepared for the Manston Airport DCO has also determined that there will be no likely effects on European sites as a result of these proposals in combination with the Proposed Development.
- 4.4 In conclusion, the Proposed Development would not infringe on the conservation management of a European site or significantly impact its current quality. There would be no risk of significant effects from the Proposed Development on any European sites, either alone or in combination with other projects and plans, and therefore there is no need to undertake an Appropriate Assessment.

## **Appendix A: Figures**



Key

Site

0 50 100 150 200 250 m

Based upon Ordnance Survey mapping with the permission of His Majesty's Stationary Office. © Crown Copyright reserved. Licence number 100017707



Project RAF Manston HRA

Title Site Location Plan

Client -

Date 16.04.2025

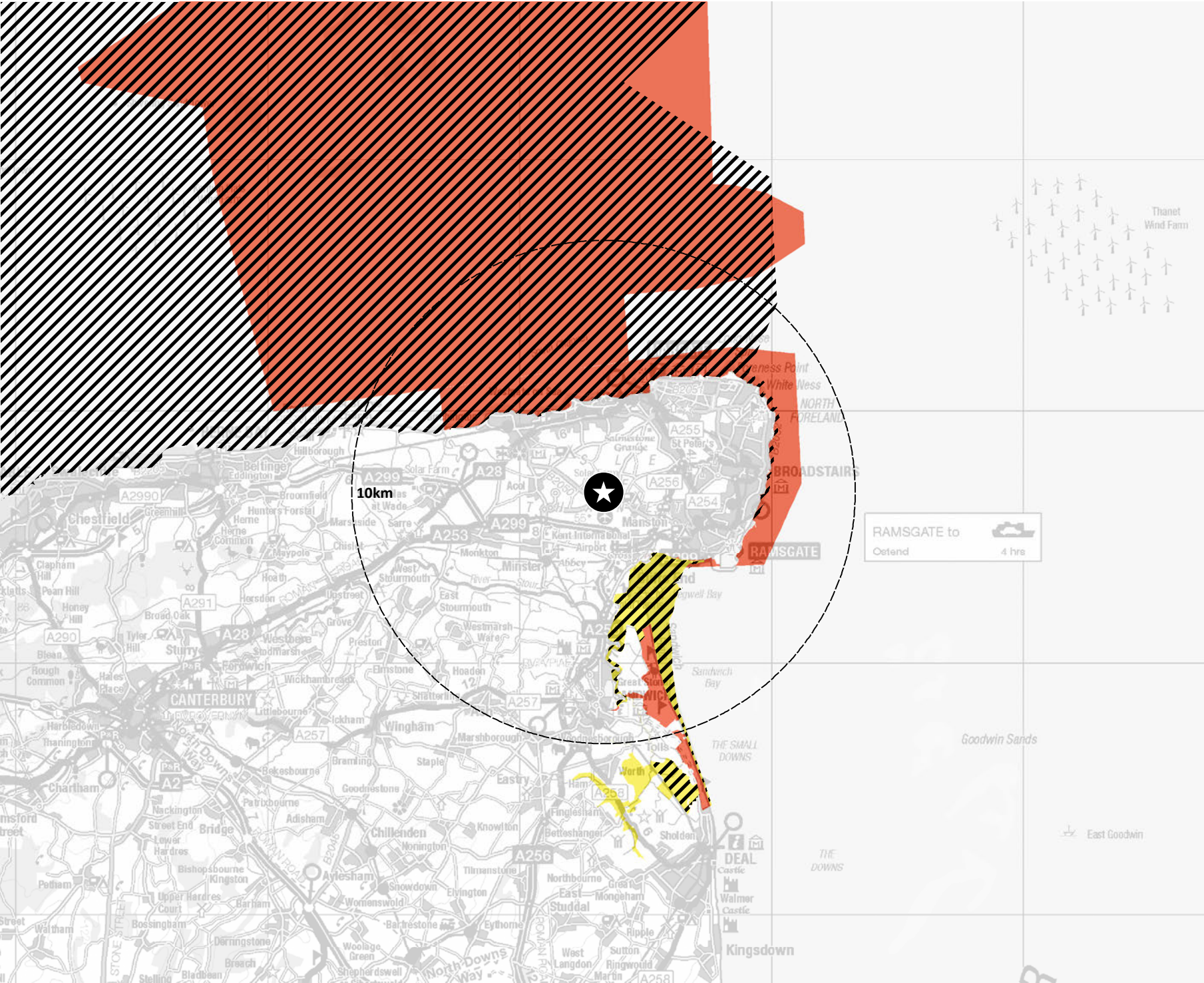
Scale 1 : 7,500 @ A4

Drawn by GF

Drg. No GIS\LF\68051\08-01

GIS Reference : S:\LF Jobs\LF68000 - LF68999\LF68051 - RAF Scampton-Wethersfield HRA\LF68051-08 - RAF Manston HRA - Site Location - 16.04.2025.mxd





**Key**

- ★ Site
- Special Area of Conservation
- Special Protection Area
- Ramsar

0 1.5 3 4.5 6 7.5km

© Natural England

Based upon Ordnance Survey mapping with the permission of His Majesty's Stationary Office. © Crown Copyright reserved. Licence number 100017707

# LICHFIELDS

Project	RAF Manston HRA
Title	Main Environmental Designations
Client	-
Date	16.04.2025
Scale	1 : 200,000 @ A4
Drawn by	GF
Drg. No	GIS\LF\68051\08-02
GIS Reference: S:\LF Jobs\LF68000 - LF68999\LF68051 - RAF Scampton-Wethersfield HRA\LF68051-08 - RAF Manston HRA - Main Environmental Designations - 16.04.2025.mxd	



## **Appendix 5 Consultation Responses**

Matthew Todd-Jones  
Ministry of Housing, Communities &  
Local Government

**Our ref:** KT/2025/133048/01-L01  
**Your ref:** PCU/RARE/Z2260/3368364

Sent by email.

**Date:** 11 November 2025

Dear Matthew,

**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.**

**Former RAF Manston, Manston Road, Ramsgate, Kent, CT12 5BS**

Thank you for consulting us on the above urgent Crown development application which we received on 03 November 2025.

As part of this consultation, we have reviewed the available documents and specifically the following:

- Illustrative Proposed Site Layout With Temporary Proposed Marquees For Information, by AtkinsRealis (ref: 050836-9834-ATR-ZZZ-XX-DR-A-0360-S2-D0100, rev: 10, dated: May 2024)
- Site Plan – Retrospective Existing Accommodation, Facilities And Ground Works, by AtkinsRealis (ref: 050836-9834-ATR-ZZZ-XX-DR-A-0151-S4-D0100, rev: 10, dated: June 2024)
- Drainage Feasibility Report, by AtkinsRealis (ref: 50836-9834-ATR-XXX-XX-RP-C-0003-S2-A4300, rev: 10, dated: June 2025)
- Geotechnical Desk Study, by BakerHicks (ref: 030003991-BHK-XX-XX-RP-G-0001, rev: 11, dated: June 2025)
- Ground Investigation Report, by AtkinsRealis (ref: 050836-9834-ATR-ZZZ-XX-RP-G-0002-S4-A3100, rev: 05, dated: March 2025)
- Outline Remediation Strategy, by AtkinsRealis (ref: 050836-9834-ATK-ZZZ-XX-RP-G-0001-S4-A3100, rev: 09, dated: June 2025)
- Outline Construction Environmental Management Plan, by AtkinsRealis (ref: 050836-9834-ATR-XXX-XX-RP-Y-0002-S4-C0900, rev: 08, dated June 2025)

### **Environment Agency position**

We have **no objection** to the proposed development **subject to the following planning conditions** being included in any permission granted.

This is in line with paragraph 187 of the National Planning Policy Framework and policies SE03 and SE04 of the Thanet Local Plan ([2020](#)).

Please refer to the following sections for our full response:

- Section 1: Technical comments
- Section 2: Conditions and informatives
- Section 3: General advice

## **Note to Ministry of Housing, Communities & Local Government**

### **Condition wording**

If you wish to amend the wording of our requested conditions or if you wish to merge them with other relevant conditions, please contact us to discuss the revised wording.

### **Decision notice**

In accordance with the 'Publishing the decision and representations 19.' extract from the Town and Country Planning (Crown Development) (Urgent Applications) (Procedure) (England) Order 2025, we wish to be notified of the decision in relation to the urgent Crown development application.

Please note that our comments are based on the details available to us at the time of writing. If any subsequent changes are made to the application, please reconsult us.

Should you have any queries regarding this response, please contact me.

Yours sincerely,

**Connor Bowman**

**Sustainable Places Planning Specialist**

E-mail [kslplanning@environment-agency.gov.uk](mailto:kslplanning@environment-agency.gov.uk)

## **Section 1: Technical comments**

### Ground Investigation Report

We have previously reviewed an earlier version (rev 2) of this document, and were also provided minor extracts from rev 4. There are a number of differences between the reports, the most significant of which is that additional groundwater investigation is recommended. We support the recommendations within the most recent revision. However, we note that a more recent document entitled "Manston Redevelopment LQA Review and High Level Scoping Report" (AtkinsRealis, August 2025), which includes greater detail on the proposed additional ground and groundwater investigation, has not been included with the documents submitted in support of the Manston Urgent Crown Development application. We have reviewed that other document and broadly agreed with its contents and proposals. As it postdates rev 9 of the Ground Investigation Report, we assume it remains the most relevant document in relation to further ground investigation. We look forward to reviewing the additional ground investigation and groundwater monitoring data.

It is noted that the 'proposed operational development' includes a 'new waste water treatment centre'. This has been noted previously, but it remains unclear what its purpose is, and where any wastewater is proposed to be discharged. This should be clarified. As outlined in our earlier comments, any proposal for the discharge of effluent to the environment will require an environmental permit unless relevant exemption criteria are met. It is an offence to make any discharge of effluent to the environment without a relevant permit or exemption.

### Outline Remediation Strategy

We have previously reviewed an earlier version (rev 4) of this document. The most recent revision has been much expanded upon since the earlier report, although many of the recommendations remain outstanding on the basis that further ground investigation and groundwater monitoring is required. Until the additional, more comprehensive ground investigation has been undertaken it is not possible to make detailed comments on a remediation strategy. We look forward to reviewing the updated ground investigation data and the relevant updates to the remediation strategy.

### Drainage Feasibility Report

We have previously reviewed an earlier version (rev 6) of this document. The revised version contains additional details on the retrospective drainage installed across the site, and includes updated site condition data. We understand that surface water has been discharged to ground via soakaways, and that foul drainage has been directed to the existing local sewer network (with permission from the sewerage undertaker). It is understood that contamination has been identified within the soils in the areas used as soakaways, but that the depth of soakaways was designed 'to reduce the likelihood of surface water infiltration interacting with contaminated soil'. This is vague and no data including validation of these areas has been provided. This should be provided, especially if the infrastructure is proposed for continued use.

The same 5 foul drainage options from the earlier revision have been proposed and

reviewed. Option 1 remains the preferred foul drainage solution, which is discharge to the local foul sewer network. As noted previously, the upgrades necessary to accommodate the anticipated additional flows will be fulfilled by Southern Water within 24 months of planning permission (or equivalent) being granted.

An interim onsite wastewater treatment plant is proposed if capacity upgrades are delayed. We have provided detailed commentary on this proposal, and we understand that the applicant has received pre-application advice from the National Permitting Service. The Groundwater and Contaminated Land team maintain the position that discharge to ground in this sensitive area, which is located within the catchment zone for several public water supplies, should not occur and alternative solutions should be sought as a priority.

Mitigation for the event that a permit is not granted has been proposed, whereby the foul water generated onsite (that cannot be accommodated by the existing foul water network) will be temporarily stored on site and then tankered to an appropriate disposal facility.

As a potential discharge to ground is included within the drainage plans, we strongly encourage the applicant to seek consultation from the licence holders of the local groundwater abstractions including those that supply water for public consumption (Southern Water).

The surface water proposal for the full application is discharge to ground via infiltration. As per our comments above on the retrospective surface water system, any proposed infiltration locations should be confirmed as being free of contamination. As noted in the previous sections on ground investigation and remediation proposals, the coverage of site investigations to date have been limited in their spatial coverage, and the historical use of the site may have left contamination that could be mobilised by focussed discharges of surface water to ground (e.g. via soakaways), so additional work will be required.

#### Outline Construction Environment Management Plan

It is acknowledged that the current revision of the CEMP is outline in nature and therefore that it contains few details on proposed environmental risk assessments. We note and welcome the proposed control/mitigation measures in Table 3-2, especially those related to the control of surface water infiltration at excavation sites, the management of soils/made ground, and the monitoring of unexpected contamination/ground conditions. We further note the 'general' recommendations for mitigation of hazardous liquid storage (e.g. impervious floor, bunded). The 'additional' mitigation measures for the protection of groundwater are also welcomed. We look forward to reviewing subsequent revisions of the CEMP.

## Section 2: Conditions and informatives

**Note:** the below conditions have been recommended in line with previous discussions and agreements between the Environment Agency, Home Office and Thanet District Council. We wish for these conditions to be included in any decision notice to ensure the development is brought forward appropriately.

### **Condition 1: Contaminated land investigation**

No development approved by this planning permission shall commence until a strategy to deal with the potential risks associated with any contamination of the site has been submitted to, and approved in writing by, the Local Planning Authority. This strategy will include the following components:

1. A preliminary risk assessment which has identified:
  - all previous uses;
  - potential contaminants associated with those uses;
  - a conceptual model of the site indicating sources, pathways and receptors; and
  - potentially unacceptable risks arising from contamination at the site.
2. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.
3. The results of the site investigation and the detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.
4. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

Any changes to these components require the written consent of the local planning authority. The scheme shall be implemented as approved.

### **Reason:**

To ensure that the development does not contribute to, or is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution in line with paragraph 187 of the National Planning Policy Framework and policies SE03 and SE04 of the Thanet Local Plan ([2020](#)).

### **Condition 2: Contamination verification**

Prior to any part of the permitted development being occupied/brought into use, a verification report demonstrating the completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to, and approved in writing, by the local planning authority. The report shall include

results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met.

**Reason:**

To ensure that the site does not pose any further risk to human health or the water environment by demonstrating that the requirements of the approved verification plan have been met and that remediation of the site is complete. This is in line with paragraph 187 of the National Planning Policy Framework and policies SE03 and SE04 of the Thanet Local Plan ([2020](#)).

**Condition 3: Unsuspected contamination**

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented as approved.

**Reason:**

To ensure that the development does not contribute to, or is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site in line with paragraph 187 of the National Planning Policy Framework and policies SE03 and SE04 of the Thanet Local Plan ([2020](#)).

**Condition 4: Foul and surface water drainage**

No part of the new authorised development is to be occupied until for that part, written details of the surface and foul water drainage plan, have been submitted to and approved in writing by the relevant planning authority. The submitted details must demonstrate:

1. The surface and foul water drainage system must be constructed in accordance with the approved details, unless otherwise agreed in writing by the relevant planning authority.
2. No part of the new authorised development is to be occupied until the construction of the entire surface and foul water drainage for that part is completed.
3. Where an attenuation basin is being proposed, the attenuation basins must be completed within the first phase of construction if construction is undertaken in phases.

**Reason:**

To ensure that the development does not contribute to, or is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution caused by mobilised contaminants in line with paragraph 187 of the National Planning Policy Framework and policies SE03 and SE04 of the Thanet Local Plan ([2020](#)).



### **Condition 5: Piling**

Piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated by a piling risk assessment that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.

### **Reason:**

To ensure that the development does not contribute to, or is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution caused by mobilised contaminants in line with paragraph 187 of the National Planning Policy Framework and policies SE03 and SE04 of the Thanet Local Plan ([2020](#)).

### **Informative(s)**

#### **Surface water drainage**

Only clean uncontaminated water should drain to the surface water system. Roof drainage shall drain directly to the surface water system (entering after the pollution prevention measures). Appropriate pollution control methods (such as trapped gullies and interceptors) should be used for drainage from access roads and car parking areas to prevent hydrocarbons from entering the surface water system. There should be no discharge into land impacted by contamination or land previously identified as being contaminated. There should be no discharge to made ground. There must be no direct discharge to groundwater, a controlled water.

#### **Piling**

Piling can result in risks to groundwater quality by mobilising contamination when boring through different bedrock layers and creating preferential pathways. Thus it should be demonstrated that any proposed piling will not result in contamination of groundwater. If Piling is proposed, a Piling Risk Assessment must be submitted, written in accordance with EA-supported guidance document "Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention, which can be found here: [Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention](#)

#### **Waste on-site**

The CL:AIRE Definition of Waste: Development Industry Code of Practice (version 2) provides operators with a framework for determining whether or not excavated material arising from site during remediation and/or land development works is waste or has ceased to be waste. Under the Code of Practice:

- excavated materials that are recovered via a treatment operation can be reused on-site providing they are treated to a standard such that they are fit for purpose and unlikely to cause pollution
- treated materials can be transferred between sites as part of a hub and cluster project



- some naturally occurring clean material can be transferred directly between sites

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on-site operations are clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

We recommend that developers should refer to:

- the [position statement](#) on the Definition of Waste: Development Industry Code of Practice
- The [waste management](#) page on GOV.UK

## Waste

Contaminated soil that is (or must be) disposed of is waste. Therefore, its handling, transport, treatment and disposal are subject to waste management legislation, which includes:

- Duty of Care Regulations 1991
- Hazardous Waste (England and Wales) Regulations 2005
- Environmental Permitting (England and Wales) Regulations 2016
- The Waste (England and Wales) Regulations 2011

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standard BS EN 14899:2005 'Characterization of Waste - Sampling of Waste Materials - Framework for the Preparation and Application of a Sampling Plan' and that the permitting status of any proposed treatment or disposal activity is clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

If you receive (or reject) any hazardous waste, you must send a report to the Environment Agency. These are known as 'returns'. If you dispose of hazardous waste at the premises where it's produced you may also need to send returns. You should follow the guidance provided here: [Hazardous waste: consignee returns guidance](#)

### Section 3: General advice

#### Connection to mains foul drainage

Government guidance contained within the national Planning Practice Guidance (Water supply, wastewater and water quality – considerations for planning applications, paragraph 020) sets out a hierarchy of drainage options that must be considered and discounted in the following order:

- Connection to the public sewer
- Package sewage treatment plant (adopted in due course by the sewerage company or owned and operated under a new appointment or variation)
- Septic Tank

Foul drainage should be connected to the main sewer. Where this is not possible, under the Environmental Permitting Regulations 2016 any discharge of sewage or trade effluent made to either surface water or groundwater will need to be registered as an exempt discharge activity or hold a permit issued by the Environment Agency, additional to planning permission. This applies to any discharge to inland freshwaters, coastal waters or relevant territorial waters.

Please note that the granting of planning permission does not guarantee the granting of an Environmental Permit. Upon receipt of a correctly filled in application form we will carry out an assessment. It can take up to 4 months before we are in a position to decide whether to grant a permit or not.

Domestic effluent discharged from a treatment plant/septic tank at 2 cubic metres or less to ground or 5 cubic metres or less to surface water in any 24-hour period must comply with General Binding Rules provided that no public foul sewer is available to serve the development and that the site is not within an inner Groundwater Source Protection Zone.

A soakaway used to serve a non-mains drainage system must be sited no less than 10 metres from the nearest watercourse, not less than 10 metres from any other foul soakaway and not less than 50 metres from the nearest potable water supply.

Where the proposed development involves the connection of foul drainage to an existing non-mains drainage system, the applicant should ensure that it is in a good state of repair, regularly de-sludged and of sufficient capacity to deal with any potential increase in flow and loading which may occur as a result of the development.

Where the existing non-mains drainage system is covered by a permit to discharge then an application to vary the permit will need to be made to reflect the increase in volume being discharged. It can take up to 13 weeks before we decide whether to vary a permit.

Further advice is available at: [Septic tanks and treatment plants: permits and general binding rules.](#)

Date: 11 November 2025  
Our ref: 532079  
Your ref: PCU/RARE/Z2260/337 1969

Matthew Todd-Jones  
Planning Casework Unit  
Ministry of Housing, Communities and Local Government



[crowncasework@communities.gov.uk](mailto:crowncasework@communities.gov.uk)

**BY EMAIL ONLY**

Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

T 0300 060 3900

Dear Matthew Todd-Jones,

**Planning consultation:** PCU/RARE/Z2260/337 1969 Urgent Crown Development Retrospective planning application for Initial Triage and Processing Centre (ITPC), and full planning permission for a temporary training facility, permanent Reception Centre and training facility ('the proposed development')

**Location:** RAF Manston, Manston Road, Ramsgate, Kent CT12 5BS

Thank you for your consultation on the above dated 03 November 2025 which was received by Natural England on the same day.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

## SUMMARY OF NATURAL ENGLAND'S ADVICE

### Designated Sites - NO OBJECTION

Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on the following statutory designated sites and has no objection:

- Thanet Coast and Sandwich Bay Special Protection Area (SPA) and Ramsar site
- Sandwich Bay Special Area of Conservation (SAC)
- Thanet Coast SSSI & SAC
- Margate and Long Sands SAC
- Outer Thames Estuary SPA
- Sandwich Bay to Hacklinge Marshes SSSI.

A lack of objection does not mean that there are no significant environmental impacts. Natural England advises that all environmental impacts and opportunities are fully considered and relevant local bodies are consulted.

Natural England's further advice on designated sites/landscapes and advice on other natural environment issues is set out below.

## **Habitats Regulation Assessment**

Natural England has reviewed the Report to Inform Habitats Regulations Assessment (HRA) Stage 1 Screening (dated March 2025) which has been prepared by AtkinsRealis UK Ltd. The document concludes that there will be no likely significant effects on the designated nature conservation sites listed above as a result of the proposed development and therefore, no Stage 2, Appropriate Assessment (AA) will be required.

Whilst it is not necessary to consult Natural England at the screening stage of the HRA we were consulted on a previous iteration of the Report to Inform HRA Stage 1 Screening and concurred with the conclusions, in our response letter of the 8 August 2024 (our ref. 484056).

### **Recreational Disturbance - Thanet Coast and Sandwich Bay SPAs and Ramsar sites**

We note from the Manston Planning Proposal Statement (dated September 2025) at paragraph 2.44 (p17) that the application includes a proposal to provide ancillary accommodation for staff through the conversion the former Commandants House, and that the Report to Inform HRA Stage 1 Screening document has identified and screened out 'disturbance to qualifying species from increased human presence and vehicle movements' (p26-27) to the Thanet Coast and Sandwich Bay SPA and Ramsar site.

We advise that provided there is no net increase in residential accommodation within the former Commandants House then we are satisfied that recreational impacts to the coastal SPA and Ramsar site is unlikely to result and on this basis, to meet the requirements of the Habitats Regulations, we advise you to record your decision that a likely significant effect can be ruled out.

### **Sites of Special Scientific Interest (SSSI)**

We note that the Ecological Appraisal Report (EAR), dated 18 March 2025, has been prepared by Ecological Planning & Research Ltd (EPR) in relation to this application. We welcome the inclusion of the two SSSIs mentioned in the report, Thanet Coast SSSI and Sandwich Bay to Hacklinge Marshes SSSI.

### **Ground and surface water pollution – Thanet Coast SSSI**

Thanet Coast SSSI is susceptible to ground and surface water pollution. However, we note that the Report to Inform HRA Stage 1 Screening has assessed that there is no hydrological connection between the application site and the Thanet Coast SAC, and therefore the Thanet Coast SSSI. We advise that it is unlikely that any adverse impacts to the Thanet Coast SSSI will result from ground and surface water pollution from the proposed development.

### **Ecological Impact Assessment (EcIA)**

We welcome that an Ecological Impact Assessment (EcIA), dated 20 June 2025, which has been prepared by EPR. Due to the time constraints associated with this consultation, it has not been possible for us to fully review this document. Therefore, we have provided no comments on the plans and strategies for the avoidance, mitigation and/compensation for impacts on Important Ecological Features (IEFs), nor the requirement for further surveys to inform these strategies.

For further general advice on the consideration of protected species and other natural environment issues please refer to Annex A at the end of this letter.

Should the proposal change or you require further information, please consult us again.

If you have any queries relating to the advice in this letter, please contact me on Nancy.Warne@naturalengland.org.uk

Yours sincerely

Nancy Warne  
Senior Officer – Sustainable Development  
Sussex & Kent Area Team

## Annex A – Natural England general advice

### Protected Landscapes

Paragraph 189 of the [National Planning Policy Framework - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/policies/national-planning-policy-framework) (NPPF) requires great weight to be given to conserving and enhancing landscape and scenic beauty within Areas of Outstanding Natural Beauty (known as National Landscapes), National Parks, and the Broads and states that the scale and extent of development within all these areas should be limited. Paragraph 190 requires exceptional circumstances to be demonstrated to justify major development within a designated landscape and sets out criteria which should be applied in considering relevant development proposals. Section 245 of the [Levelling-up and Regeneration Act 2023 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/2023/1/section/245) places a duty on relevant authorities (including local planning authorities) to seek to further the statutory purposes of a National Park, the Broads or an Area of Outstanding Natural Beauty in England in exercising their functions. This duty also applies to proposals outside the designated area but impacting on its natural beauty.

The local planning authority should carefully consider any impacts on the statutory purposes of protected landscapes and their settings in line with the NPPF, relevant development plan policies and the Section 245 duty. The relevant National Landscape Partnership or Conservation Board may be able to offer advice on the impacts of the proposal on the natural beauty of the area and the aims and objectives of the statutory management plan, as well as environmental enhancement opportunities. Where available, a local Landscape Character Assessment can also be a helpful guide to the landscape's sensitivity to development and its capacity to accommodate proposed development.

### Wider landscapes

Paragraph 187 of the NPPF highlights the need to protect and enhance valued landscapes through the planning system. This application may present opportunities to protect and enhance locally valued landscapes, including any local landscape designations. You may want to consider whether any local landscape features or characteristics (such as ponds, woodland, or dry-stone walls) could be incorporated into the development to respond to and enhance local landscape character and distinctiveness, in line with any local landscape character assessments. Where the impacts of development are likely to be significant, a Landscape and Visual Impact Assessment should be provided with the proposal to inform decision making. We refer you to the [Guidelines for Landscape and Visual Impact Assessment \(GLVIA3\) - Landscape Institute](https://www.landscapelinstitute.org.uk/guidelines-for-landscape-and-visual-impact-assessment-glvia3/) for further guidance.

### Biodiversity duty

Section 40 of the [Natural Environment and Rural Communities Act 2006 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/2006/14/section/40) places a duty on the local planning authority to conserve and enhance biodiversity as part of its decision making. We refer you to the [Complying with the biodiversity duty - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/guidance/complying-with-the-biodiversity-duty) for further information.

### Designated nature conservation sites

Paragraphs 193-195 of the NPPF set out the principles for determining applications impacting on Sites of Special Scientific Interest (SSSI) and habitats sites (Special Areas of Conservation (SACs) and Special Protection Areas (SPAs)). Both the direct and indirect impacts of the development should be considered.

A Habitats Regulations Assessment is needed where a proposal might affect a habitat site (see [Habitats regulations assessments: protecting a European site - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/guidance/habitats-regulations-assessments-protecting-a-european-site) and Natural England must be consulted on 'appropriate assessments' (see [Appropriate assessment - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/guidance/appropriate-assessment) for more information for planning authorities).

Natural England must also be consulted where development is in or likely to affect a SSSI and provides advice on potential impacts on SSSIs either via the [SSSI Impact Risk Zones \(England\) \(arcgis.com\)](https://arcgis.com) or as standard or bespoke consultation responses. Section 28G of the Wildlife and Countryside Act 1981 places a duty on all public bodies to take reasonable steps, consistent with the proper exercise of their functions, to further the conservation and enhancement of the features for which an SSSI has been notified ([Sites of special scientific interest: public body responsibilities - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/guidance/sites-of-special-scientific-interest-public-body-responsibilities)).

## Annex A – Natural England general advice

### Air Quality

Natural England has produced [‘Air pollution and development: advice for local authorities. How to assess sector-specific planning applications that could affect air quality on a protected site’](#). This standing advice is to help planning authorities understand the impact on statutory protected sites from particular developments that emit specific air pollutants. The advice covers emissions of ammonia (NH<sub>3</sub>), nitrogen oxides (NO, NO<sub>2</sub> or NO<sub>x</sub>), nitrogen deposition, acid deposition and sulphur dioxide (SO<sub>2</sub>).

The standing advice is Natural England’s formal statutory advice and is a material consideration. It provides decision makers with the information needed to fulfil their statutory duties when making decisions on planning applications with potential air pollution impacts.

Note that this advice cannot be used to assess Nationally Significant Infrastructure Projects (NSIPs) or local plans.

### Protected Species

Natural England has produced [Protected species and development: advice for local planning authorities - GOV.UK](#) (standing advice) to help planning authorities understand the impact of particular developments on protected species.

Natural England will only provide bespoke advice on protected species where they form part of a Site of Special Scientific Interest or in exceptional circumstances. A protected species licence may be required in certain cases. We refer you to [Wildlife licences: when you need to apply](#) ([www.gov.uk](http://www.gov.uk)) for more information.

### Local sites and priority habitats and species

The local planning authority should consider the impacts of the proposed development on any local wildlife or geodiversity site, in line with paragraphs 187, 188 and 192 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sites and improve their connectivity to help nature’s recovery. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local environmental records centre, wildlife trust, geoconservation groups or recording societies. Emerging [Local nature recovery strategies - GOV.UK](#) ([www.gov.uk](http://www.gov.uk)) may also provide further useful information.

Those habitats and species which are of particular importance for nature conservation are included as ‘priority habitats and species’ in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest on the Magic website or as Local Wildlife Sites. We refer you to [Habitats and species of principal importance in England](#) ([gov.uk](http://gov.uk)) for a list of priority habitats and species in England. You should consider priority habitats and species when applying your ‘biodiversity duty’ to your policy or decision making

Natural England does not routinely hold priority species data. Such data should be collected when impacts on priority habitats or species are considered likely.

Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. We refer you to the [Brownfield Hub - Buglife](#) for more information and Natural England’s [Open Mosaic Habitat \(Draft\) - data.gov.uk](#) (Open Mosaic Habitat inventory), which can be used as the starting point for detailed brownfield land assessments.

### Biodiversity and wider environmental gains

Development should provide net gains for biodiversity in line with the NPPF paragraphs 187(d), 192 and 193. Unless exempt major development (defined in the [National Planning Policy Framework](#) ([publishing.service.gov.uk](http://publishing.service.gov.uk)) glossary) is required by law to deliver a biodiversity gain of at least 10% from 12 February 2024 and this requirement was extended to minor development from April 2024. For nationally significant infrastructure projects (NSIPs), it is anticipated that the requirement for biodiversity net gain will be implemented from May 2026.



## Annex A – Natural England general advice

[Biodiversity Net Gain](#) guidance (gov.uk) provides more information on biodiversity net gain and includes a link to the [Biodiversity Net Gain Planning Practice Guidance](#) (gov.uk).

The statutory biodiversity metric should be used to calculate biodiversity losses and gains for terrestrial and intertidal habitats and can be used to inform any development project. We refer you to [Calculate biodiversity value with the statutory biodiversity metric](#) for more information. For minor development sites, [The Small Sites Metric](#) may be used where these sites meet the criteria to use this Small Sites Metric. This is a simplified version of the statutory biodiversity metric and is designed for use where certain criteria are met.

The mitigation hierarchy as set out in paragraph 193 of the NPPF should be followed to firstly consider what existing habitats within the site can be retained or enhanced. Where on-site measures are not possible, provision off-site will need to be considered.

Where off-site delivery of biodiversity gain is proposed on a special site designated for nature (e.g. a SSSI or habitats site) prior consent or assent may be required from Natural England. More information is available on [Sites of Special Scientific Interest: managing your land](#)

Development also provides opportunities to secure wider biodiversity enhancements and environmental gains, as outlined in the NPPF (paragraphs 8, 77, 109, 125, 187, 188, 192 and 193). Opportunities for enhancement might include incorporating features to support specific species within the design of new buildings such as swift or bat boxes or designing lighting to encourage wildlife.

[The Environmental Benefits from Nature Tool - Beta Test Version - JP038 \(naturalengland.org.uk\)](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the statutory biodiversity metric.

[Natural environment - GOV.UK \(www.gov.uk\)](#) provides further information on biodiversity net gain, the mitigation hierarchy and wider environmental net gain.

### **Ancient woodland, ancient and veteran trees**

The local planning authority should consider any impacts on ancient woodland and ancient and veteran trees in line with paragraph 193 of the NPPF. The [Natural England Access to Evidence - Ancient woodlands Map](#) can help to identify ancient woodland. Natural England and the Forestry Commission have produced [Ancient woodland, ancient trees and veteran trees: advice for making planning decisions - GOV.UK \(www.gov.uk\)](#) (standing advice) for planning authorities. It should be considered when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland, ancient and veteran trees where they form part of a Site of Special Scientific Interest or in exceptional circumstances.

### **Best and most versatile agricultural land and soils**

Local planning authorities are responsible for ensuring that they have sufficient detailed agricultural land classification (ALC) information to apply NPPF policies (Paragraphs 187, 188). This is the case regardless of whether the proposed development is sufficiently large to consult Natural England. Further information is contained in the [Guide to assessing development proposals on agricultural land - GOV.UK \(www.gov.uk\)](#). [Find open data - data.gov.uk](#) on Agricultural Land Classification or use the information available on [MAGIC \(defra.gov.uk\)](#).

The Defra [Construction Code of Practice for the Sustainable Use of Soils on Construction Sites \(publishing.service.gov.uk\)](#) provides guidance on soil protection, and we recommend its use in the design and construction of development, including any planning conditions. For mineral working and landfilling, we refer you to [Reclaim minerals extraction and landfill sites to agriculture - GOV.UK \(www.gov.uk\)](#), which provides guidance on soil protection for site restoration and aftercare. The [Soils Guidance \(quarrying.org\)](#) provides detailed guidance on soil handling for mineral sites.



## Annex A – Natural England general advice

Should the development proceed, we advise that the developer uses an appropriately experienced soil specialist to advise on, and supervise soil handling, including identifying when soils are dry enough to be handled and how to make the best use of soils on site.

### **Green Infrastructure**

For evidence-based advice and tools on how to design, deliver and manage green and blue infrastructure (GI) we refer you to [Green Infrastructure Home \(naturalengland.org.uk\)](https://naturalengland.org.uk/green-infrastructure) (the Green Infrastructure Framework). GI should create and maintain green liveable places that enable people to experience and connect with nature, and that offer everyone, wherever they live, access to good quality parks, greenspaces, recreational, walking and cycling routes that are inclusive, safe, welcoming, well-managed and accessible for all. GI provision should enhance ecological networks, support ecosystems services and connect as a living network at local, regional and national scales.

Development should be designed to meet the 15 [GI How Principles \(naturalengland.org.uk\)](https://naturalengland.org.uk/gi-how-principles). The GI Standards can be used to inform the quality, quantity and type of GI to be provided. Major development should have a GI plan including a long-term delivery and management plan. Relevant aspects of local authority GI strategies should be delivered where appropriate.

The [Green Infrastructure Map \(naturalengland.org.uk\)](https://naturalengland.org.uk/green-infrastructure-map) and [GI Mapping Analysis \(naturalengland.org.uk\)](https://naturalengland.org.uk/gi-mapping-analysis) are GI mapping resources that can be used to help assess deficiencies in greenspace provision and identify priority locations for new GI provision.

### **Access and Recreation:**

Natural England encourages any proposal to incorporate measures to help improve people's access to the natural environment. Measures such as reinstating existing footpaths, together with the creation of new footpaths and bridleways should be considered. Links to urban fringe areas should also be explored to strengthen access networks, reduce fragmentation, and promote wider green infrastructure.

### **Rights of Way, Access land, Coastal access and National Trails:**

Paragraphs 105, 185, 187 and 193 of the NPPF highlight the importance of public rights of way and access. Development should consider potential impacts on access land, common land, rights of way and coastal access routes in the vicinity of the development.

Consideration should also be given to the potential impacts on any nearby National Trails. We refer you to [Find your perfect trail, and discover the land of myths and legend - National Trails](#) for information including contact details for the National Trail Officer.

The King Charles III England Coast Path (KCIIIECP) is a National Trail around the whole of the English Coast. It has an associated coastal margin subject to public access rights. Parts of the KCIIIECP are not on Public Rights of Way but are subject to public access rights. Consideration should be given to the impact of any development on the KCIIIECP and the benefits of maintaining a continuous coastal route.

Appropriate mitigation measures should be incorporated for any adverse impacts on Rights of Way, Access land, Coastal access, and National Trails.

Further information is set out in the Planning Practice Guidance on the [Natural environment - GOV.UK \(www.gov.uk\)](https://www.gov.uk/natural-environment).

## **Kent County Council – Highways’ representation on**

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

**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.**

### **Transport Assessment (TA) and Travel Plan Framework (TPF)**

The Highway Authority agrees with methodology of the TA in determining trip generation, distribution across the network. Surveys were taken of existing staffing levels on the site and the associated car movements, as well as vehicle occupancy counts which were then used to develop a site-specific trip rate across the day and the network peaks. Trip distribution cross referenced “Travel to Work” survey data with junction turning counts in the vicinity of the site and the existing site trip distribution garnered from the surveys to accurately reflect travel patterns associated with the operation of the site. An additional survey of modal split allowed a profile to be built up of traffic flows for each phase of site operation.

It is noted that the trip generation does not take into account the site’s previous use as a RAF Fire Training Facility, and therefore the TA presents a ‘worst case scenario’ in terms of highway impact, treating the trips as all-new onto the network.

The resulting traffic forecasts used existing traffic flow survey data from the neighboring Manston Airport DCO site, supported by new survey data at key junctions on the local highway network to develop a baseline. The forecasts were supplemented by flows from committed development in the area, the relevant sites to this assessment being agreed with the Highway Authority.

Local Traffic modelling carried out at key junctions in the area revealed significant detrimental impacts at the Spitfire Way/Manston Road junction, and the A299 Minster roundabout. As other development has recently enacted requisite capacity improvements at the A299 Minster roundabout, it was considered that this site would be best positioned to address its impact at the adjacent Spitfire Way/Manston Road junction for its mitigation, in support of the Thanet Transport Strategy and Local Plan Policy (Policy SP47) and are designed to accommodate both MRC and committed developments up to 2043.

It is also noted that the TPF contains measures that promote modal shift away from private car usage, including enhanced public transport services, shuttle buses for staff to Thanet Parkway for access to Rail services, and a managed car-sharing scheme. The site’s sustainability credentials will be further augmented by the provision of electric vehicle charging facilities and additional cycle parking.

### **Construction Traffic Management Plan (CTMP)**

The CTMP is designed to minimise disruption and ensure safe operation on the existing highway network during the construction phase, through a comprehensive package of measures.

Construction traffic is expected to operate weekdays from 07:00 to 19:00. The peak traffic stage is during Site Clearing and Grading with 220 daily vehicle movements. Traffic then reduces through most stages, with a slight increase during Handover (180 vehicles/day). No Abnormal Indivisible Loads (AILs) are anticipated.

Routing strategies aim to prioritise strategic road network access and avoid sensitive areas such as Manston Village and schools, as outlined in the CTMP.

### **Highways Mitigation - Spitfire junction improvements**

Further to comments from KCC Highways last year, discussions around the proposed mitigation at the Spitfire Junction have progressed in collaboration with the Home Office (HO) and RiverOak Strategic Partners (RSP). KCC Highways has continued to maintain that this scheme should be delivered upfront either through the forthcoming SDO application or a S278 agreement.

In the spirit of expediting matters, KCC Highways commissioned a design for the roundabout to a standard that would accommodate both the MRC and Airport sites at full operation and Local Plan growth, as well as facilitating HGV and pedestrian/cycle movements envisaged through this section of the wider Manston-Haine link, contained within available highway and SDO/DCO boundaries. Indicative Costings have also been provided for the scheme, although it was acknowledged that the final design would be subject to further collaboration and agreement on delivery mechanism.

Consultants for the Airport have subsequently tendered their own design proposals, currently pending a Stage 1 Road Safety Audit. In reportedly siting the scheme within the DCO boundary, this also raises questions for us over how the scheme will actually be delivered prior to full operation of the MRC, with the HO indicating that a proportionate contribution is available instead.

We expect, therefore, that a way to deliver this scheme in a timely manner will also be agreed upon to avoid the need for any later remedial works at this junction, or disruption to this part of the highway network, to the detriment of the Thanet Transport Strategy for the Manston-Haine link.

### **Other Highway Matters**

The HO (through the Manston Transformation Programme) is committed to the transfer of an area of crown land (the precise area is yet to be confirmed and agreed by the HO as part of detailed highways design work) within the southwestern corner of the Manston site bordering the B2050 and Manston Road, should such land be required to support the proposed highway works. The HO is also aware of emerging proposals by the KCC as the Local Highway Authority, the for road widening and the provision of walking and cycling infrastructure on Manston Road, located along the southern boundary of the site as part of the Manston to Haine link project, and is committed to facilitating and

agreeing transfer of land or deed of dedication as highway, subject to further technical discussions and compatibility with the Manston Transformation Programme.

## **Conclusion**

KCC Highways supports the principles and methodologies outlined in the TA, TPF, and CTMP, and welcomes continued collaboration to ensure timely delivery of necessary mitigation measures. The commitment to sustainable transport and strategic network improvements is noted and encouraged.

## DIRECTORATE OF PLACE

Please ask for: Iain Livingstone  
Our reference : UCD/TH/25/1222  
Date: 11/11/2025



Mr Matthew Todd-Jones  
Head of Orders & Crown Casework  
Planning Casework Unit – Crown Casework Team  
Ministry of Housing, Communities & Local Government

Via Email

### **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**

Thank you for the consultation letter received on the 3rd November 2025 regarding the submission of an application from the Home Office under the Crown Development Urgent Applications procedure. The Council welcomes the opportunity to comment on the proposals, which have been subject of engagement with the Home Office over the past two years. It is the Council's intention to provide advice to the Secretary of State within this letter as a “substantive response to consultation” in accordance with Regulation 16(d) of Town and Country Planning (Crown Development) (Urgent Applications) (Procedure) (England) Order 2025.

It is noted that the Council's previous formal correspondence with the Home Office, in response to public engagement about the Manston Reception Centre (dated 1st October 2025), has been provided within the Engagement report submitted with the current application. This letter will provide an update on the key relevant issues raised in that letter, however given the time constraints on the process requiring a response within 6 working days, this letter will not be an exhaustive analysis of the proposal. It will highlight those matters which we consider should be examined by the Secretary of State in order to make robust determination on the proposal, applying both guidance within the National Planning Policy Framework and the Thanet Local Plan.

To reiterate the Council's statement from October 2024:

*“We fully recognise the importance of good quality reception facilities for people arriving in the UK from other countries and believe that everyone should be treated with dignity, respect*

*and with due regard for their personal health and safety. Other than this statement of principle, we do not intend to comment on the need for a Reception Centre. “*

It therefore falls to consider the key planning issues in regard to the proposal.

### **Assessment of Planning Policy Framework**

The Council considers the assessment of planning policies from the Thanet Local Plan, provided at Section 7 of the submitted Planning Statement, as a thorough list of relevant policies from the development plan.

### **Environmental Matters**

Policy SE04 of the Thanet Local Plan states how proposals within the Groundwater Source Protection Zone will only be permitted if there is no risk of contamination to groundwater sources. The Council has previously raised the need for consideration of potential contamination of controlled waters, due to the previous use and location of the site, as well as the need for compliance with the guidance of the drinking water inspectorate (2024) with the Home office. In relation to the former, the Council has confirmed the list of conditions within the agreed position statement (with the Home Office and the Environment Agency) (June 2025) to cover contaminated land investigation, unsuspected contamination, verification and surface water/foul drainage. This position statement is included within the Engagement report submitted with the application.

The Air Quality (v3.6) and Noise (10.0) reports have been reviewed. A detailed air quality assessment of the increased operational movements and associated traffic emissions was shown to have a negligible impact on receptors. Construction traffic was screened out. The Council has long standing monitoring sites nearby and baseline data was used for the assessment. It is noted that currently there are 11 diesel generators in use with an aim of reducing this to 5 once improvements to on site power supply had been made - and that these would be in use only as back up. The use of generators on site is inconsistent with the Council's objective to improve air quality and reduce emissions. The move to permanent mains power connection is supported and understood to have been implemented. The Council would recommend that the backup generators shall not be used for routine power provision and only operate in the event of a mains power failure.

During the stakeholder engagement, recommendations to include cumulative impacts associated with Manston Airport were also considered within the assessment which were subsequently taken into consideration. The proposed plant includes: ASHPs, AHU and mechanical ventilation systems for which technical data were unavailable for inclusion in the NIA. An updated assessment will be required and the Council would like to be further consulted on proposed noise assessment and mitigation measures with an objective that the plant rating level does not exceed background L90 at the facade of the nearest residential dwelling.

It is unclear whether the Council's letter dated 19th September 2025 relating to potential contamination, including measures related to on site drinking water quality, specifically in response to the AtkinsRealis Scoping Report and Proposed Schedule, has been included

within the submission details. It is included at Annex 1 for consideration by the Secretary of State. The Council also appends the Environment Agency letter dated 18th September 2025 at Annex 2 in relation to this issue.

## **Highways**

Policy SP47 of the Thanet Local Plan requires that development which has a material impact on the capacity of the B2050 Manston Road 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 are thereby necessitated. This applies directly to the proposal, specifically in relation to the junction at Manston Road/Spitfire Way (known as "Spitfire Junction").

The Council welcomes the provision of proposed mitigation within the submitted Transport Assessment following engagement with the Local Highways Authority. Specifically, a proportionate financial contribution and disposal of land to support the delivery of road infrastructure at Spitfire Junction is fully supported by the Council, complying with Policy SP47 whilst also being in accordance with Regulation 122 of the Community Infrastructure Levy Regulations 2010.

It is not clear however the mechanism by which this mitigation will be secured prior to any potential grant of planning permission by the Secretary of State. The Council requests that any planning permission if granted is conditional upon the provision of both the land and a proportional financial contribution for works to the Spitfire Junction to Kent County Council.

In addition to the above, the Council welcomes the inclusion of a Travel plan Framework in accordance with Policy TP01 and Paragraph 118 of the NPPF. We will defer to KCC as the Local Highway Authority on the precise nature of the content, however the Council supports the development of improved pedestrian routes from the site in the full Travel Plan. In particular, the Council supports the opportunity to provide/upgrade pedestrian routes along the B2050, with the provision of land on the northern verge (on the south west boundary of the site), as proposed by Minster Parish Council in collaboration with KCC. This should be explicitly referenced in any planning condition in regard to the full Travel Plan or be referenced/required by other means in any permission granted.

The Council notes the proposed main access route for construction vehicles along the main road network (A229/B2190) outlined in the Outline Construction Traffic Management plan, avoiding the village of Manston which is supported. However as outlined the Transport submissions, Spitfire junction has restricted visibility whilst being in excess of capacity at peak times. Therefore the Council supports the potential booking/staggered times system through the day for deliveries/HGVs etc utilised during construction, to avoid an unacceptable impact on the road network during peak times. This should be developed in tandem to the construction programme and vehicle estimates work in advance of the full construction traffic management plan being produced, with the involvement of the Local Highway Authority.

## **Landscape and Visual Impact**

The Council understands the use of parameter plans to ensure design and implementation flexibility, however this does limit the ability of the Council to meaningfully comment on the impact of potentially 4-storey high structures (12metres limit) in different locations on the site. Notwithstanding this, the existing enclosed nature of the site and lack of a wider visual impact on the Landscape Character area means that any impact is anticipated to be localised. It is not clear from the submission the mechanism for consideration of the design of the building to be constructed including appearance, materials etc. The Council requests the ability to comment on these matters through planning conditions or a similar mechanism where possible. Similarly, the design of the potentially 6 metre high boundary fence, directly adjacent to Manston Road, has the potential for a localised oppressive impact adjacent to residential properties, and the Council would welcome the opportunity to comment on the details of its appearance, noting the need to provide sufficient security of this sensitive use on the site.

### **Other Matters**

The Council anticipates that the Secretary of State will have regard to, and place substantial weight on, the views of Kent County Council as Local Highway Authority, Natural England and the Environment Agency, either provided through the engagement report submitted or in any correspondence received during this process. In particular, the site provides ecological opportunities for the enhancement of protected species habitats and provisions for landscape enhancement of grassland and scrub, notwithstanding the anticipated loss of woodland on the western corner of the site. The planning conditions outlined in the ecological impact assessment, including mitigation/translocation of species and flora, in addition to tree protection and habitat compensation (in the absence of Biodiversity Net gain), should be required to comply with Thanet Local Plan Policy SP30.

We trust the above comments will be considered by the Secretary of State in the determination of this application and please do not hesitate to contact us if you have any questions.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Iain Livingstone', written in a cursive style.

Iain Livingstone  
Planning Applications Manager



Our ref: NH/25/13552

Matthew Todd-Jones  
Head of Orders & Crown Casework  
Planning Casework Unit – Crown Casework Team

[crowncasework@communities.gov.uk](mailto:crowncasework@communities.gov.uk)

Spatial Planning Team  
South East Region  
Operations Directorate  
National Highways  
Bridge House  
1 Walnut Tree Close  
Guildford  
GU1 4LZ

Tel: 0300 470 1046  
11 November 2025

Dear Mr Todd-Jones

**Type of application** The Town and Country Planning (Crown Development)  
(Urgent Applications) (Procedure) (England) Order 2025

**Application Reference** MHCLG: PCU/RARE/Z2260/3371969

**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.**

### **Summary of Representation**

Referring to the consultation on a planning application dated 3 November referenced above, notice is hereby given that National Highways’ formal recommendation is that we:

### **Have No Objection to the proposals**

We have No Objection to the principle of the development, nor the practicalities of it, recognising its distance from the Strategic Road Network, and the likely level, timing and distribution of traffic it would generate on the Strategic Road Network.

### **Background**

National Highways is the government owned company which operates, maintains and improves the SRN as the strategic highway company appointed under the provisions of the Infrastructure Act 2015 and in accordance with the [Licence](#) issued by the Secretary of State for Transport.

National Highways is a statutory consultee to the planning process. It has a specific obligation to deliver economic growth through the provision of a safe and reliable SRN in line with the provisions set out in [DfT Circular 01/2022: The strategic road network and the delivery of sustainable development](#).

## **Reasons**

We have reviewed the application and the submitted supporting documents from the SRN perspective. The SRN closest to the site comprises the M2 Junction 7 and the A2 at Dover

We will be concerned with proposals that have the potential to impact on the safe, reliable and/or efficient operation of the SRN (the tests set out in DfT C1/22 and MHCLG NPPF2024), due to

- a) The traffic attracted to, generated by or rerouted as a result of proposals and/or
- b) the construction, operation or maintenance of a site adjacent to the SRN.

With regards (a) we note that the site

- Has been in use for uses similar to the proposed uses for some time and hence would already be generating and distributing some traffic
- Is located around 20 miles from M2J7 and around 15 miles from the A2 at Dover

Therefore, the traffic generated and distributed to the SRN by the proposed development will not be so significant as to require further evidence or any mitigation. Hence, we have no objection from this perspective

With regards (b), no works are proposed to or close to the SRN. Therefore, we have no objection from this perspective.

If any party has any queries with regards our representations, please contact us via [PlanningSE@nationalhighways.co.uk](mailto:PlanningSE@nationalhighways.co.uk)

Yours sincerely



Kevin Bown  
Spatial Planner  
[Kevin.Bown@nationalhighways.co.uk](mailto:Kevin.Bown@nationalhighways.co.uk)



Defence  
Infrastructure  
Organisation

Ministry of Defence  
St George's House  
DMS Whittington  
Lichfield  
Staffordshire  
WS14 9PY

Email: [DIOODC-TownPlanning@mod.gov.uk](mailto:DIOODC-TownPlanning@mod.gov.uk)

Sent via email only to [crowncasework@communities.gov.uk](mailto:crowncasework@communities.gov.uk)

11 November 2025

Dear Sir or Madam

**The Town and Country Planning (Crown Development) (Urgent Applications) (Procedure) (England) Order 2025. Planning application no: PCU/RARE/Z2260/3371969**

**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.**

The Ministry of Defence (MOD) welcomes the opportunity to review the above application and would like to make the following comments.

With respect to statutory safeguarding matters, the red line boundary of the proposal falls entirely within the statutory safeguarding zone for the High Resolution directional Finder equipment at Manston. Based on the information made available, and following assessment against safeguarding parameters, it has been concluded that the proposed development will not have an adverse impact upon the equipment. As such, there is no objection from a statutory safeguarding perspective.

With respect to non-statutory matters, it is noted that Paragraph 2.4 of the Manston Planning Proposal Statement states: '*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'. Whilst there are no objections to the above planning application, MOD would like to have assurances that continued engagement between MOD and the Home Office will take place to ensure that moving forward, the proposals will not impact adversely on the continued use of, or contractual obligations relating to, the communications tower.*

Yours faithfully,

Town Planning Team,  
Strategy & Plans Estates Division  
Defence Infrastructure Organisation



The Coal  
Authority

200 Lichfield Lane  
Mansfield  
Nottinghamshire  
NG18 4RG

T: 01623 637 119 (Planning Enquiries)

E: [planningconsultation@coal.gov.uk](mailto:planningconsultation@coal.gov.uk)

W: [www.gov.uk/coalauthority](http://www.gov.uk/coalauthority)

**For the attention of: Mr M Todd-Jones – Head of Orders & Crown Casework**

Planning Casework Unit – Crown Casework Team

[By email: [crowncasework@communities.gov.uk](mailto:crowncasework@communities.gov.uk)]

4<sup>th</sup> November 2025

Dear Mr Todd-Jones

**Re: PCU/RARE/Z2260/3371969 - 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**

Thank you for your notification of the 3<sup>rd</sup> November 2025 seeking the views of the Mining Remediation Authority (trading name of the Coal Authority) on the above.

We are a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, we have a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.

We have assessed the application site, as identified by the red line boundary on the Site Location Plan (Drawing Number 050836-9834-ATR-ZZZ-XX-DR-A-0001-S4-D0100, Rev P05), and can confirm that the site does not lie within the defined coalfield.

On the basis that the site does not fall within an area of past coal mining activity the Planning team have no specific comments to make on this application.

Please do not hesitate to contact me should you wish to discuss this further.

Yours sincerely



Making a **better future** for people  
and the environment **in mining areas**

Melanie Lindsley

**Melanie Lindsley** BA (Hons), DipEH, DipURP, MA, PGCertUD, PGCertSP, MRTPI  
**Principal Planning & Development Manager**

## **Disclaimer**

The above consultation response is provided by the Coal Authority as a statutory consultee and is based upon the latest available data and the electronic consultation records held by the Coal Authority since 1 April 2013. The comments made are also based on the information provided to the Coal Authority and/or information that has been published. The views and conclusions contained in this response may be subject to review and amendment by the Coal Authority if additional or new data/information (such as a revised Coal Mining Risk Assessment) is provided.

Ministry of Communities and Local Government  
2 Marsham Street  
London



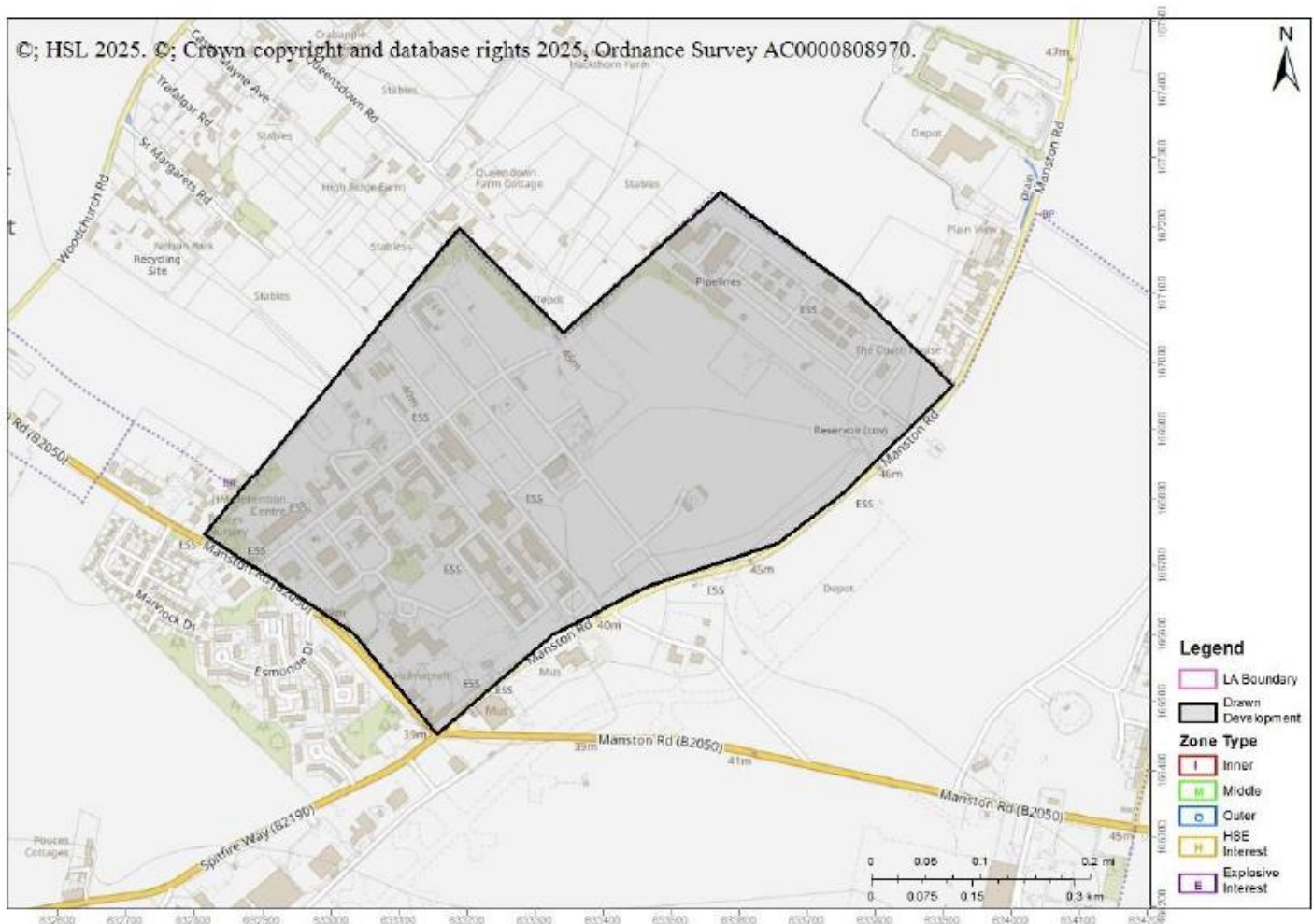
SW1P 4DF

**Advice : HSL-251104112150-2217 Does Not Cross Any Consultation Zones**

**Your Ref:** PCU/RARE/Z2260/3368364

**Development Name:** Manston ITPC

**Comments:**



The proposed development site which you have identified does not currently lie within the consultation distance (CD) of a major hazard site or major accident hazard pipeline; therefore at present HSE does not need to be consulted on any developments on this site. However, should there be a delay submitting a planning application for the proposed development on this site, you may wish to approach HSE again to ensure that there have been no changes to CDs in this area in the intervening period.

This advice report has been generated using information supplied by Declan Lau at Ministry of Communities and Local Government on 04 November 2025.



Matthew Todd-Jones  
Head of Orders & Crown Casework  
Planning Casework Unit – Crown Casework Team  
Ministry of Housing, Communities & Local Government  
23 Stephenson Street  
Birmingham  
B2 4BH

Our ref: 20251111-Kent-  
Manston-ITPC-RC-f

Your ref:  
PCU/RARE/Z2260/3371969

11 November 2025

Dear Matthew,

**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**

Thank you for consulting Historic England about the Home Office’s application for works of demolition and development for the Initial Triage Processing Centre and Reception Centre at Manston.

**Summary**

Historic England has no substantive comments on the proposals, but we refer you to Kent County Council in respect of the undesignated archaeology and other undesignated heritage assets of the site.

**Advice**

The proposals concern part of the former RAF Manston. The larger site is of some historic interest, having been in use during both the First and Second World Wars. Although its historic interest is reflected by the presence of the RAF Manston History Museum and the Spitfire and Hurricane Memorial Museum, both beyond the application site, the former RAF establishment survives only partially.

None of the surviving structures within the application site are designated heritage assets. The AtkinsRéalis Archaeological Desk Based Assessment provided with the consultation considers



both the archaeological interest of the site and the status of some surviving or demolished military structures as undesignated heritage assets.

Historic England's position remains consistent with our pre-application advice (letter of 1 October 2024, reproduced in the Cushman and Wakefield Manston Engagement Report, October 2025). Given our practice of concentrating our advice on the effect of proposals on designated heritage assets, and the complementary role of local planning authorities in considering undesignated heritage assets, we do not have substantive observations on these proposals. As before, we would expect Kent County Council to advise on the implications of the proposals on undesignated heritage assets.

The National Planning Policy Framework provides for a balanced and proportionate approach to determining applications which may affect undesignated heritage assets, which you should follow in determining this application. The Framework requires that "The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset." (NPPF, 216)

It is not necessary for us to be consulted on this application again, unless there are material changes to the proposals.

Yours sincerely,

John Neale  
Development Advice Director  
[john.neale@historicengland.org.uk](mailto:john.neale@historicengland.org.uk)

**From:** [Joe Bourke](#)  
**To:** [Maria Bowen](#); [Matthew Todd-Jones](#)  
**Subject:** FW: URGENT INFORMATION REQUEST - URGENT CROWN DEVELOPMENT APPLICATION - MANSTON IRC  
**Date:** 05 February 2026 11:23:00  
**Attachments:** [image006.png](#)

---

Hi both these are the emails I propose to add. If you'd like any of the below removing just let me know

Thanks

Joe

---

**From:** Connor Bowman <Connor.Bowman@environment-agency.gov.uk>  
**Sent:** 04 February 2026 08:39  
**To:** Matthew Todd-Jones <Matthew.Todd-Jones@communities.gov.uk>; amanda.berry <amanda.berry@thanet.gov.uk>  
**Cc:** iain.livingstone <iain.livingstone@thanet.gov.uk>; morgan.sproates <morgan.sproates@thanet.gov.uk>; Matt Holloway <Matt.Holloway@environment-agency.gov.uk>; Joe Bourke <Joe.Bourke@communities.gov.uk>; Maria Bowen <Maria.Bowen@communities.gov.uk>  
**Subject:** RE: URGENT INFORMATION REQUEST - URGENT CROWN DEVELOPMENT APPLICATION - MANSTON IRC

Hi Matt,

Thank you for your email and update.

It is unfortunate that we're unable to review the final draft conditions. However, thank you for consulting us throughout this process and if we could be notified of the decision as mentioned in our first response that would be great.

I'm on leave from tomorrow until 02 March 2026, so if there are any urgent questions, please direct these to [kslplanning@environment-agency.gov.uk](mailto:kslplanning@environment-agency.gov.uk) and continue to Cc Matt Holloway.

Many thanks,

**Connor Bowman**  
**Planning Specialist – Kent and South London Sustainable Places**  
**Environment Agency** | Orchard House, Endeavour Park, Addington, West Malling, Kent, ME19 5SH  
☎ +447771861844 🖱 [kslplanning@environment-agency.gov.uk](mailto:kslplanning@environment-agency.gov.uk)

Pronouns: he/him ([why is this here?](#))





**Does Your Proposal Have Environmental Issues or Opportunities? Speak To Us Early!**

If you're planning a new development, we want to work with you to make the process as smooth as possible. We offer a bespoke advice service where you will be assigned a project manager who will be a single point of contact for you at the EA, giving you detailed specialist advice. This early engagement can significantly reduce uncertainty and delays to your project. More information can be found on our website [here](#)

---

**From:** Matthew Todd-Jones <[Matthew.Todd-Jones@communities.gov.uk](mailto:Matthew.Todd-Jones@communities.gov.uk)>

**Sent:** 03 February 2026 13:49

**To:** Connor Bowman <[Connor.Bowman@environment-agency.gov.uk](mailto:Connor.Bowman@environment-agency.gov.uk)>; amanda.berry <[amanda.berry@thanet.gov.uk](mailto:amanda.berry@thanet.gov.uk)>

**Cc:** iain.livingstone (Guest) <[iain.livingstone@thanet.gov.uk](mailto:iain.livingstone@thanet.gov.uk)>; morgan.sproates (Guest) <[morgan.sproates@thanet.gov.uk](mailto:morgan.sproates@thanet.gov.uk)>; Matt Holloway <[Matt.Holloway@environment-agency.gov.uk](mailto:Matt.Holloway@environment-agency.gov.uk)>; Joe Bourke <[Joe.Bourke@communities.gov.uk](mailto:Joe.Bourke@communities.gov.uk)>; Maria Bowen <[Maria.Bowen@communities.gov.uk](mailto:Maria.Bowen@communities.gov.uk)>

**Subject:** RE: URGENT INFORMATION REQUEST - URGENT CROWN DEVELOPMENT APPLICATION - MANSTON IRC

OFFICIAL

Hi Connor,

Thanks for your suggested amendments, we have incorporated them into the next draft of the conditions. Given the current urgency of getting to a decision on this application we're unable to share a final draft of the conditions for consideration.

Thanks,

Matt

---

OFFICIAL

**From:** Connor Bowman <[Connor.Bowman@environment-agency.gov.uk](mailto:Connor.Bowman@environment-agency.gov.uk)>

**Sent:** 27 January 2026 13:07

**To:** Matthew Todd-Jones <[Matthew.Todd-Jones@communities.gov.uk](mailto:Matthew.Todd-Jones@communities.gov.uk)>; amanda.berry <[amanda.berry@thanet.gov.uk](mailto:amanda.berry@thanet.gov.uk)>

**Cc:** iain.livingstone <[iain.livingstone@thanet.gov.uk](mailto:iain.livingstone@thanet.gov.uk)>; morgan.sproates <[morgan.sproates@thanet.gov.uk](mailto:morgan.sproates@thanet.gov.uk)>; Matt Holloway <[Matt.Holloway@environment-agency.gov.uk](mailto:Matt.Holloway@environment-agency.gov.uk)>; Joe Bourke <[Joe.Bourke@communities.gov.uk](mailto:Joe.Bourke@communities.gov.uk)>; Maria Bowen <[Maria.Bowen@communities.gov.uk](mailto:Maria.Bowen@communities.gov.uk)>

**Subject:** RE: URGENT INFORMATION REQUEST - URGENT CROWN DEVELOPMENT APPLICATION - MANSTON IRC

You don't often get email from [connor.bowman@environment-agency.gov.uk](mailto:connor.bowman@environment-agency.gov.uk). [Learn why this is important](#)  
Hi Matthew,

Thank you again for forwarding across the full set of conditions.

Please find attached our suggested amendments.

We do not agree with the reference to a specific remediation strategy when the site investigations have not been fully completed. Additionally, the specific version of the remediation strategy mentioned in the draft condition is not available for us to re-review, so we are unable to check the specifics in there. Our comments on that specific version of the Remediation Strategy are available via our original response to this consultation, however, this simply details what we've already agreed and that more work is needed before additional comments can be made on the remediation strategy.

If we could be re-consulted on the final version of the draft conditions that would be great. If you have any questions, please do not hesitate to contact me.

Many thanks,

**Connor Bowman**  
**Planning Specialist –Kent and South London Sustainable Places**  
**Environment Agency** | Orchard House, Endeavour Park, Addington, West Malling, Kent, ME19 5SH  
☎ +447771861844 📧 [kslplanning@environment-agency.gov.uk](mailto:kslplanning@environment-agency.gov.uk)

Pronouns: he/him ([why is this here?](#))



**Does Your Proposal Have Environmental Issues or Opportunities? Speak To Us Early!**

If you're planning a new development, we want to work with you to make the process as smooth as possible. We offer a bespoke advice service where you will be assigned a project manager who will be a single point of contact for you at the EA, giving you detailed specialist advice. This early engagement can significantly reduce uncertainty and delays to your project. More information can be found on our website [here](#)

---

**From:** Matthew Todd-Jones <[Matthew.Todd-Jones@communities.gov.uk](mailto:Matthew.Todd-Jones@communities.gov.uk)>

**Sent:** 23 January 2026 14:42

**To:** Connor Bowman <[Connor.Bowman@environment-agency.gov.uk](mailto:Connor.Bowman@environment-agency.gov.uk)>; amanda.berry

<[amanda.berry@thanet.gov.uk](mailto:amanda.berry@thanet.gov.uk)>

**Cc:** iain.livingstone (Guest) <[iain.livingstone@thanet.gov.uk](mailto:iain.livingstone@thanet.gov.uk)>; morgan.sproates (Guest) <[morgan.sproates@thanet.gov.uk](mailto:morgan.sproates@thanet.gov.uk)>; Matt Holloway <[Matt.Holloway@environment-agency.gov.uk](mailto:Matt.Holloway@environment-agency.gov.uk)>; Joe Bourke <[Joe.Bourke@communities.gov.uk](mailto:Joe.Bourke@communities.gov.uk)>; Maria Bowen <[Maria.Bowen@communities.gov.uk](mailto:Maria.Bowen@communities.gov.uk)>

**Subject:** RE: URGENT INFORMATION REQUEST - URGENT CROWN DEVELOPMENT APPLICATION - MANSTON IRC

**Importance:** High

OFFICIAL

Hi both,

Apologies for not coming back to you sooner, we appreciate your comments.

I just wanted to run past you the other conditions relating to this matter so that condition 13 is not taken in isolation, please see attached. They relate to the production of a remediation strategy should one be required after further ground investigation resulting from condition 13, a radiation remediation strategy and a verification report.

I would be grateful if you could take a look at the conditions at your earliest possible convenience and let me know if you have any further comments. Amanda – we note Morgan’s recommended wording from his email on Monday and would be amenable to including words to the same effect.

In terms of consultation, we consulted with both Thanet and the EA just before the Christmas period and didn’t send any proposed updated conditions until the new year. It was always our intention to consult both of you on this matter given your background with it. I note that we only shared condition 13 as this was the condition primarily discussed, but in hindsight it would have been helpful for us to share conditions 14-16 too.

Happy to arrange a follow up call if needed.

Regards,  
Matt

---

**Joe Bourke**

---

**From:** morgan.sproates  
**Sent:** 21 January 2026 12:47  
**To:** Maria Bowen  
**Cc:** iain.livingstone; amanda.berry; Matthew Todd-Jones; Joe Bourke  
**Subject:** Re: URGENT INFORMATION REQUEST - URGENT CROWN DEVELOPMENT APPLICATION - MANSTON IRC

Dear Maria,

Thank you for your further consultation on Condition 13.

Previous correspondence on ground conditions has been provided to the Home Office confirming the agreed (TDC and the EA) conditions and position statement; including the high level Atkins-Realis Scoping Report (Aug 2025).

I am not sure the below condition fully covers the sequential approach to ensure remediation of new contaminants identified during the additional ground investigation works planned for the relevant phases. However, we will defer to the EA with regards to the acceptability of the outline remediation strategy.

Please could you insert the para stating **'This shall include consideration of receptors to include...'** before the **'A report of the findings shall be submitted to...'** line as it relates to the site investigation itself.

An additional recommended clause needs to be added to the condition regarding 'no occupation' of the relevant phase prior to completion of remediation works and verification reporting, approved in writing by the Secretary of State, for that relevant phase.

**'Prior to occupation of the relevant phase, a verification report demonstrating the completion of works set out in the approved remediation strategy and the effectiveness of the remediation for that relevant phase shall be submitted to, and approved in writing, by the Secretary of State for Housing, Communities and Local Government. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met.'**

Kind regards,



• **Morgan Sproates**

- BSc MBA MGDE MRSC MInstLM
- Regulatory Services Manager

- 
- Regulatory Services | Neighbourhoods
  - (01843) 577 505
  - [Cecil Street Margate, CT9 1XZ](#)



- (01843) 577 000
- <https://www.thanet.gov.uk/>
- 

On Tue, 20 Jan 2026 at 16:37, Maria Bowen <[Maria.Bowen@communities.gov.uk](mailto:Maria.Bowen@communities.gov.uk)> wrote:

OFFICIAL-SENSITIVE - HMG ONLY

Dear all,

I am writing further to my colleagues, Joe Bourke, e-mails to you of the 08/01 and 15/01 (copies of which are below).

As you are aware the application has been determined as an 'Urgent Crown Development' and such we need to conclude the wording of condition 13 prior to sending the case to the Secretary of State for determination. Please could you send any comments you have on this re-worded condition by 2pm tomorrow (21/01). If no further comments are received by this time, we will assume the council have no further comments to make and will proceed with the determination of the application.

If you have any queries, please do not hesitate to contact me by return e-mail before the 2pm cut off time.

Kind regards,

Maria Bowen



Ministry of Housing,  
Communities &  
Local Government

Maria Bowen

Head of Crown Casework

Ministry of Housing, Communities & Local Government

Chief Planners Directorate

Mob: 07458 118804 | [gov.uk/mhclg](https://gov.uk/mhclg) | [@mhclg](https://twitter.com/mhclg)

OFFICIAL

OFFICIAL-SENSITIVE - HMG ONLY

From: Joe Bourke

**Sent:** 15 January 2026 09:42

**To:** Iain Livingstone <[iain.livingstone@thanet.gov.uk](mailto:iain.livingstone@thanet.gov.uk)>; Morgan Sproates <[morgan.sproates@thanet.gov.uk](mailto:morgan.sproates@thanet.gov.uk)>; amanda.berry <[amanda.berry@thanet.gov.uk](mailto:amanda.berry@thanet.gov.uk)>

**Cc:** Matthew Todd-Jones <[Matthew.Todd-Jones@communities.gov.uk](mailto:Matthew.Todd-Jones@communities.gov.uk)>

**Subject:** FW: Updated Planning Condition Wording Manston IRC

Dear Morgan, Amanda and Iain

Further to my last email have you have the opportunity to consider the proposed wording below and do you have any further comments ?

Thanks

Joe



Ministry of Housing,  
Communities &  
Local Government

Joseph Bourke

Senior Casework Manager

Planning Casework Unit

Chief Planner's Directorate

Ministry of Housing, Communities  
& Local Government

[gov.uk/dluhc](https://gov.uk/dluhc) | @luhc



---

**From:** Joe Bourke

**Sent:** 08 January 2026 11:24

**To:** Iain Livingstone <[iain.livingstone@thanet.gov.uk](mailto:iain.livingstone@thanet.gov.uk)>; 'amanda.berry@thanet.gov.uk' <[amanda.berry@thanet.gov.uk](mailto:amanda.berry@thanet.gov.uk)>; 'morgan.sproates@thanet.gov.uk' <[morgan.sproates@thanet.gov.uk](mailto:morgan.sproates@thanet.gov.uk)>

**Cc:** Matthew Todd-Jones <[Matthew.Todd-Jones@communities.gov.uk](mailto:Matthew.Todd-Jones@communities.gov.uk)>; Maria Bowen <[Maria.Bowen@communities.gov.uk](mailto:Maria.Bowen@communities.gov.uk)>

**Subject:** Updated Planning Condition Wording Manston IRC

Dear Morgan, Amanda and Iain

Following from our meeting on 22 December 2025. Please see below the updated draft wording for Condition 13 of the planning proposal:

‘Development of any phase of the permanent Manston Reception Centre and or permanent Training Facility shall not commence until a ground investigation for the relevant phase, has been completed in accordance with the submitted Outlined Remediation Strategy Approach dated 16 June 2025 (v9) (document reference 050836-9834-ATK-ZZZ-XX-RP-G-0001-S4-A3100)). A report of the findings shall be submitted to and approved in writing by the Secretary of State for Housing, Communities and Local Government prior to commencement of the phase, and implemented thereafter throughout construction.

This shall include consideration of receptors to include Human health (existing and future site users), property (existing or proposed) including but not limited to buildings, crops, livestock, pets, woodland and service lines and pipes; adjoining land; ground waters, surface waters and public water abstraction and ecological systems’

If you have any further comments, please let Matt or myself know

Thanks

Joe



Ministry of Housing,  
Communities &  
Local Government

**Joseph Bourke**

**Senior Casework Manager**

**Planning Casework Unit**

**Chief Planner's Directorate**

**Ministry of Housing, Communities  
& Local Government**

[gov.uk/dluhc](https://gov.uk/dluhc) | @luhc

## Appendix 6 Former RAF Manston Planning History

- 1.1 The records on TDC's online planning register relating to the Site date from December 2007. A review of TDC's online planning register on 28 March 2025 identified the planning records in Table 2.1 which all relate to minor development.
- 1.2 The most recent application sought prior approval for the demolition of five buildings clustered and adjacent to the Site entrance and are numbered blocks 004 (H Block with seven rectangular blocks), 0045 (described as a plant room), 131 described as ancillary building), 010 (described as blues and twos building) and 044a (described as ancillary building). TDC concluded that prior approval was not required on the 4 February 2025.

Table A2.1 RAF Manston Planning History

Application Reference	Description of Development	Decision
F/TH/07/1452	Erection of a two storey fire training house	Approved (10.12.07)
F/TH/08/0508	Erection of a 5 metre high street lighting column	Approved (06.05.08)
F/TH/08/0870	Erection of 2No. five metre high street lighting columns	Approved (08.09.08)
F/TH/13/0599	Installation of 2No. 2.4m high transmission dishes on existing lattice tower, together with a ground based equipment cabinet, electricity meter cabinet, feeder cables and gantry support	Approved (13.09.13)
DM/TH/14/1110	Application for prior notification for the demolition of single storey building	Prior Approval Not Required (08.01.15)
F/TH/15/0894	Installation of 2 no. transmission dishes on the existing 46m high lattice tower	Approved (16.11.15)
DM/TH/23/0876	Application for prior notification of proposed demolition of 6No. buildings	Prior Approval Not Required (26.07.23)
DM/TH/23/0996	Application for prior notification of proposed demolition of 5No. buildings	Withdrawn (01.08.23)
F/TH/23/0471	Temporary change of use of land for a period of 5 years to provide a HGV Driver Instruction and DVSA HGV Test Centre(Retrospective)	Withdrawn (30.08.23)
DM/TH/24/1457	Application for prior notification of proposed demolition of 5No. buildings	Prior Approval Not Required (04.02.25)

Source: Thanet District Council.



**Birmingham**  
0121 713 1530  
birmingham@lichfields.uk

**Edinburgh**  
0131 285 0670  
edinburgh@lichfields.uk

**Manchester**  
0161 837 6130  
manchester@lichfields.uk

**Bristol**  
0117 403 1980  
bristol@lichfields.uk

**Leeds**  
0113 397 1397  
leeds@lichfields.uk

**Newcastle**  
0191 261 5685  
newcastle@lichfields.uk

**Cardiff**  
029 2043 5880  
cardiff@lichfields.uk

**London**  
020 7837 4477  
london@lichfields.uk

**Thames Valley**  
0118 334 1920  
thamesvalley@lichfields.uk

@LichfieldsUK

**lichfields.uk**