

██████████
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 ██████████,

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,

[Redacted signature]

[Redacted name]

E-mail 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



██████████
Planning Casework Unit
Ministry of Housing, Communities and Local Government

crowncasework@communities.gov.uk

BY EMAIL ONLY

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

T 0300 060 3900

Dear ██████████

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/or 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

[Redacted]

[Redacted]

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.landscapematters.org.uk/resources/guidelines-for-landscape-and-visual-impact-assessment) 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/publications/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/publications/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/publications/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/publications/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 (NH₃), nitrogen oxides (NO, NO₂ or NO_x), nitrogen deposition, acid deposition and sulphur dioxide (SO₂).

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) 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) 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) 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) 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: [REDACTED]

Our reference : UCD/TH/25/1222

Date: 11/11/2025



Mr [REDACTED]
[REDACTED]

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 large rectangular black box redacting the signature and name of the official.A black box redacting contact information, likely a phone number and email address.

Our ref: NH/25/13552

██████████
████████████████████
Planning Casework Unit – Crown Casework Team

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 ██████████

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

Yours sincerely

[Redacted signature]

[Redacted name]

[Redacted title]

[Redacted contact information]



Defence
Infrastructure
Organisation

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

Email: DIOODC-TownPlanning@mod.gov.uk

Sent via email only to 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

W: www.gov.uk/coalauthority

For the attention of: [REDACTED] – **Head of Orders & Crown Casework**

Planning Casework Unit – Crown Casework Team

[By email: crowncasework@communities.gov.uk]

4th November 2025

Dear [REDACTED]

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 3rd November 2025 seeking the views of the Mining Remediation Authority (trading name of the Coal Authority) on the above.

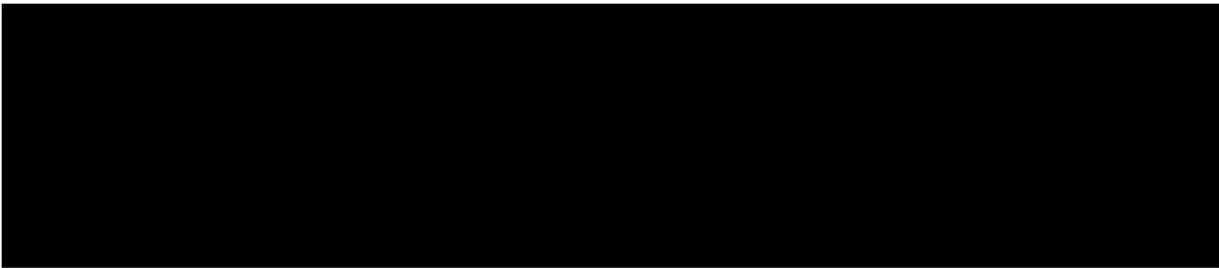
We are a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, we have a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.

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



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



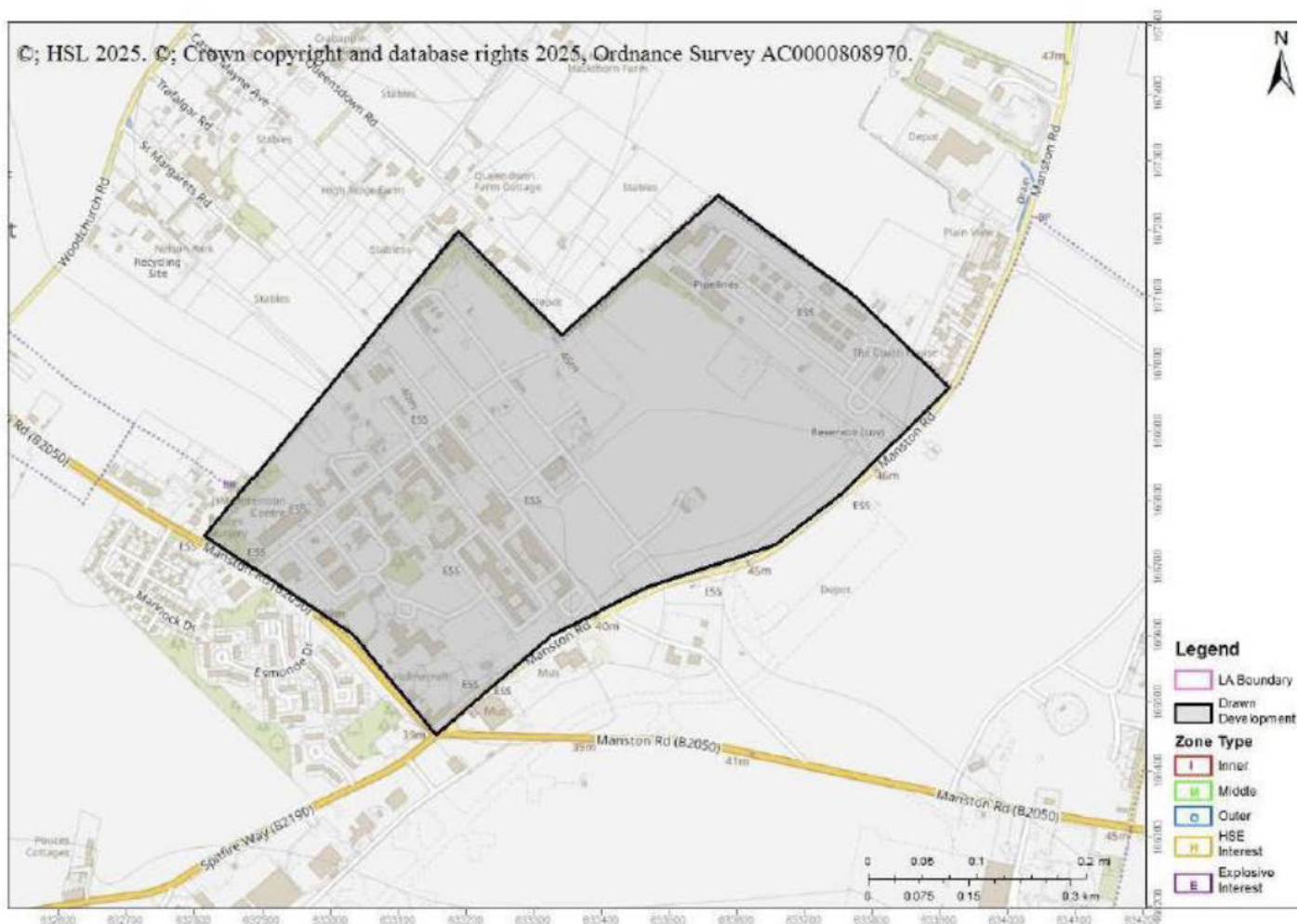
SW1P 4DF

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 [REDACTED] at Ministry of Communities and Local Government on 04 November 2025.

[REDACTED]
[REDACTED]
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 [REDACTED]

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,

[Redacted signature block]

From: [REDACTED]

Sent: 04 February 2026 08:39

To: [REDACTED]
[REDACTED]

Cc: [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

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

[REDACTED]

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 and continue to Cc [REDACTED]

Many thanks,

[REDACTED] – Kent and South London Sustainable Places
Environment Agency | Orchard House, Endeavour Park, Addington, West Malling, Kent, ME19 5SH
☎ +447771861844 📧 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: [REDACTED]

Sent: 03 February 2026 13:49

To: [REDACTED]
[REDACTED]

Cc: [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

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

OFFICIAL

Hi [REDACTED]

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,

[REDACTED]

OFFICIAL

From: [REDACTED]

Sent: 27 January 2026 13:07

To: [REDACTED]
[REDACTED]

Cc: [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

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

You don't often get email from [REDACTED]

[Learn why this is important](#)

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,

[REDACTED] –Kent and South London Sustainable Places
Environment Agency | Orchard House, Endeavour Park, Addington, West Malling, Kent, ME19 5SH
☎ +447771861844 📧 kslplanning@environment-agency.gov.uk

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



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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: [REDACTED]

Sent: 23 January 2026 14:42

To: [REDACTED]

[REDACTED]
Cc: [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

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

Importance: High

OFFICIAL

Hi [REDACTED]

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. [REDACTED] – we note [REDACTED] 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,
[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: 21 January 2026 12:47
To: [REDACTED]
Cc: [REDACTED]
Subject: Re: URGENT INFORMATION REQUEST - URGENT CROWN DEVELOPMENT APPLICATION - MANSTON IRC

Dear [REDACTED]

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,



- [REDACTED]
- BSc MBA MGDE MRSC MInstLM
- [REDACTED]

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



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

On Tue, 20 Jan 2026 at 16:37, [REDACTED] wrote:

[REDACTED]

Dear all,

I am writing further to my colleagues, [REDACTED] 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,

[REDACTED]



Ministry of Housing,
Communities &
Local Government

[REDACTED]

[REDACTED]

Ministry of Housing, Communities & Local Government

Chief Planners Directorate

[REDACTED] | gov.uk/mhclg | [@mhclg](https://twitter.com/mhclg)

OFFICIAL

From: [REDACTED]

Sent: 15 January 2026 09:42

To: [REDACTED]

Subject: FW: Updated Planning Condition Wording Manston IRC

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

Thanks



Ministry of Housing,
Communities &
Local Government

Planning Casework Unit

Chief Planner's Directorate

Ministry of Housing, Communities
& Local Government

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

From: [REDACTED]
Sent: 08 January 2026 11:24
To: [REDACTED]
Cc: [REDACTED]
Subject: Updated Planning Condition Wording Manston IRC

Dear [REDACTED]

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 [REDACTED] or myself know

Thanks



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