

Ourref:
manston220716
Your ref:
TH/16/0550



22nd July 2016

Iain Livingstone
Thanet District Council
PO Box 9
Cecil Street
Margate
Kent
CT9 1XZ

Kent Wildlife Trust
Tyland Barn
Sandling Maidstone
Kent ME14 3BD
Tel: (01622) 662012
Fax: (01622) 671390
info@kentwildlife.org.uk
www.kentwildlifetrust.org.uk

Dear Iain

**TH/16/0550 redevelopment of site
at Manston Airport, Manston Road, Manston, Ramsgate**

Thank you for the opportunity to comment on the hybrid application for redevelopment of Manston Airport.

Biodiversity opportunity

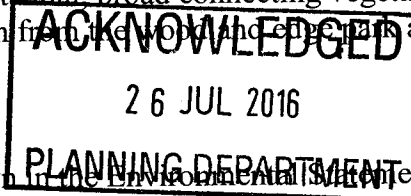
As this is such a significant development, Kent Wildlife Trust would expect it to demonstrate good quality enhancement for biodiversity, in accordance with paragraph 118 of the NPPF. Although this site is just outside any Biodiversity Opportunity Area (BOA), we would like to see consideration being given to its position on the chalk plateau and a locally-appropriate species planting list.

Green Infrastructure

Particular focus on well-designed and functional green infrastructure is important on a site of such a large scale, to bring biodiversity and species movement through into the site and to allow it to connect well with its surroundings. The scheme layout should reflect surrounding natural features. At the moment, the outline for residential development indicated does not appear to make the most of this opportunity and we would like to see more substantial, broad connecting vegetated greenways across the residential section of the site both from the open and edge park and also from the managed open space, "Spitfire Park" to the north.

Species and Habitats

Kent Wildlife Trust cannot accept the conclusion drawn in the Environmental Statement that there will be negligible impact on brown hare¹. We would like further clarification on how this



¹ Brown Hare are section 41 species of "high" priority status Natural Environment and Rural Communities (NERC) Act (2006)



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conclusion was drawn and further detailed proposals to mitigate for this species (3.7.10 Executive summary).

We note the comments from KCC's ecological service (23/06/16) regarding outstanding species surveys. We would most certainly support the recommendation that Thanet District Council does not determine an application, even at outline stage, without the required survey information being available. This should not be conditioned and the results of these surveys should be used to inform outline design and mitigation².

International sites

It is crucial that Thanet District Council satisfies itself that this significant development, comprising a high number of residential dwellings, does not have a negative impact upon nearby internationally protected sites of Thanet Coast and Sandwich Bay SPA and SAC. Financial contribution needs to be made to the infrastructure for reducing the impacts from increased visitors. This contribution should be incorporated into the current policy (SAMMs) and take the same approach. In addition to a financial contribution, provision needs to be made for alternative, accessible greenspace (SANGs). We would recommend that any SANGs planned as part of this development should be completed and available for residents in advance of occupation of dwellings.

Kent Wildlife Trust would like to submit a **holding objection** to the proposed development, subject to the above information being provided in advance of determination.

Yours sincerely

Vanessa Evans
Planning and Policy Officer

² Government Circular 06/2005