



MINISTRY OF DEFENCE

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BY E-MAIL ONLY

Defence Infrastructure Organisation

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F.A.O. Mr I. Livingstone

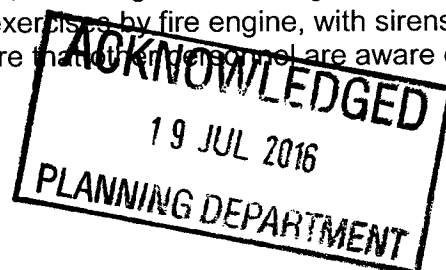
Dear Mr Livingstone,

Application Number: OL/TH/16/0550: Comprehensive Redevelopment of Manston Airport Site for a Range of Uses Including Residential & Supporting Uses, Employment etc.

I refer to the above application.

The Defence Infrastructure Organisation has been consulted on this application as a statutory consultee and my colleagues have responded to you separately from that perspective. However, the application also raises a number of other issues for the Ministry of Defence which are set out below:

1. Improvement of Spitfire roundabout. The proposed improvement scheme relies on land within Ministry of Defence, (MOD), ownership - the verge on the northern side of Spitfire Way - and could not be achieved without the MOD's consent. Such consent may not be forthcoming, given the MOD's concerns with the application;
2. The redevelopment proposals do not appear to take account of existing activities at the Defence Fire Training & Development Centre, (DFTDC), located opposite the application site, off Spitfire Way. As you may be aware, the DFTDC is the centre of excellence for the provision of basic and further training for RAF, MOD and contractor fire fighters, in addition to the provision of fire fighter training and fire awareness to the wider Defence community. The training exercises there are as intense and realistic as possible, which has potential implications for any nearby residential properties. These include:
 - Creation of black smoke. Training exercises at the DFTDC include the ignition of fuel (so that personnel can practice extinguishing such fires), which creates considerable quantities of black smoke. At the moment, these exercises take place from 08.00 – 17.00, Monday – Thursday and from 08.00 – 13.00 on Fridays. Once every five weeks, an exercise takes place between the hours of 18.00 – 22.00. However, those hours could change in the future, if training needs change;
 - Noise. Personnel are transported to the site of exercises by fire engine, with sirens sounding, in order to increase realism and ensure that other personnel are aware of



the approaching fire engine. Currently, this can occur from 08.00 – 17.00, Monday – Thursday and 08.00 – 13.00 on Fridays, at various times dependant on the specific courses taking place. This can also take place between the hours of 18.00 and 22.00, once per week. Again, however, those hours could be subject to change in the future.

I am concerned that these activities – particularly those taking place in the evenings - may give rise to complaints from future residents, leading to pressure on the MOD to change or even stop these essential training exercises. Given the unique role of the DFTDC and its importance to Defence, the curtailing of training on the site would have significant implications for MOD.

The LPA's attention is drawn to paragraph 123 of the National Planning Policy Framework, (NPPF), which states that:

'Planning policies and decisions should aim to:

- Avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development;
- Mitigate and reduce to a minimum other adverse impacts on health and quality of life arising from new development, including through the use of conditions;
- Recognise that development will often create noise and existing businesses wanting to develop in continuance of their business should not have unreasonable restrictions put on them because of changes in nearby land uses since they were established...'

In my view, the application does not show how the impact of noise and black smoke could be addressed in order to ensure an acceptable quality of life for future residents and approval of the application would therefore not be in accordance with the first two bullet points of paragraph 123 of the NPPF.

It is noted that Saved Policy EC6 of the Thanet District Adopted Plan (2006) is supportive of fire training on the DFTDC site. The development of a large number of dwellings in close proximity to the site may give rise to complaints from residents and lead to demands for restrictions on the activities being undertaken there. Refusal of the application would help to protect the continued operation of the site, in accordance with the Council's adopted planning policy and the third bullet of paragraph 123 of the NPPF.

On the basis of the above, I wish to register a formal objection to the application on behalf of the MOD and request that, unless the applicant can demonstrate that the proposed development can adequately mitigate the training activities undertaken at the DFTDC, the application is refused by the LPA.

Yours sincerely,



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