

## Iain Livingstone

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**From:** Morgan Sproates  
**Sent:** 22 July 2016 16:07  
**To:** Iain Livingstone  
**Cc:** Amanda Berry  
**Subject:** FW: OL/TH/16/0550 Manston Airport

Dear Iain,

Thank you for consulting Environmental Health on the above application regarding the Environmental Statement and the assessment of the following impacts: air quality, noise and contamination. We offer the following comments

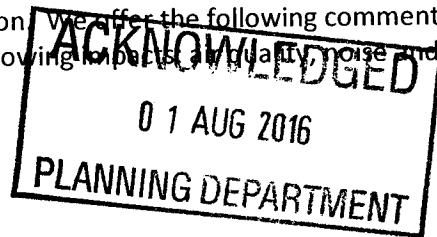
### Air Quality

#### **Operational Phase**

Air quality is considered in Chapter 5 (volume 1) and Appendix 5 (volume 2). Although the proposed site lies outside our urban wide AQMA the scale of development and the volume of traffic that will be generated requires that air quality impacts are considered along with emissions mitigation.

Appropriate legislation, policy and up-to-date guidance has been considered along with relevant assessment methodology and significance criteria. However, Environmental Health would like to make the following comments:

- Sections on designated sites and ecological impacts of nitrogen deposition should be directed to Natural England for consideration.
- For clarification 5.5.1 Thanet has an urban wide AQMA not whole borough but this corrected further throughout the assessment.
- For clarification 5.5.4 Environmental Health wanted emissions from the fire training facility to be considered given that the application seeks to introduce new receptors but we have no evidence to suggest emissions are or have ever adversely affected air quality at existing receptors.
- 5.4.4 & 5.4.5 As requested consideration of impacts on existing traffic pollution hot spots within the urban AQMA and emissions from the fire training facility have been considered.
- 5.4.23 5.4.26 - 2015 Defra background concentrations were adopted for all assessment scenarios as worst case. We welcome that predictions will not take into account assumptions that emissions concentrations will improve with technological advancements in future vehicle technologies.
- 5.4.35 & Appendix 5.6 Model verification. The verification table 5.6A does not correspond to the monitoring data given for 2015 in table 5.5 – data are no longer provisional, this needs to be reflected in the verification. Also, use of ZH5 data from 2015 is challenged. This was a particularly low pollution year and is not typical of the trend. I would ask that a long term average of the last 5 years annual mean monitoring data is taken as an acceptable reference for model verification – this has particularly relevance to Receptor 16 which is located in a well evidenced exceedance area and impacts reconsidered. Note, current impact at this location already indicates slight adverse impact.
- The assessment needs to consider at outline stage whether the substantial impacts and worsening at hot spot locations can be overcome before it can be considered fully. More information on mitigation measures and viability should be included to determine whether impacts on receptors can be prevented, minimised or controlled.
- The air quality assessment for scenarios 6 indicates that two receptor locations will be significantly impacted by increased traffic and associated emissions of nitrogen dioxide. It also shows a slight worsening at Receptor 16, i.e. The Square, Birchington – a pollution hot spot, where even a small worsening in air quality is a cause for concern. In Table 5.14 mitigation / enhancement measures it is suggested that junction improvements and traffic control measures should be further considered and specific detailed measures



Site suitability - where receptors are exposed to noise levels exceed an external noise level greater than 50dB LAeqT (desirable as opposed to acceptable) the mitigation proposed in 6.8 will be required.

### Reasons

The NPPF affirms the Noise Policy Statement for England's aims that through the effective management and control of environmental, neighbour and neighbourhood noise within the context of Government policy on sustainable development shall:

- avoid significant adverse impacts on health and quality of life;
- mitigate and minimise adverse impacts on health and quality of life; and
- where possible, contribute to the improvement of health and quality of life.

### Contamination

Appropriate guidance, assessment and methodology have been considered for Chapter 13 of the ES and the related the Preliminary Risk Assessment document at Technical Appendix 13.1. The Environmental Health Department would make the following comments.

The application site overlies the former Kent International Airport which has former uses as an RAF/MOD/USAF base and commercial airport (with underground fuel storage facilities). Given the history of the site and on-site presence of USTs, there exists the potential for contamination of the ground from leaks or spills of fuel/oil/hydrocarbons alongside the potential presence of ground gas, unknown filled ground, FIDO, UXOs and other materials from WWII activities, ACMs in buildings, and a variety of products used in the running and maintenance of commercial and military airfields, including fire retardants, PCBs, antifreeze and pesticides.

The PRA report considers the risk to Human Health as **Medium to High** and the risk to Controlled Waters as **High** in the context of a mixed use development. However, the ES confirms that the developer will ensure that effects on identified sensitive receptors will be mitigated by intrusive site investigation (compliant with BS10175) to test the preliminary conceptual model and appropriate remediation given the proposed end use. This is in order that potential effects from any historic contamination identified at the site will be rendered as an 'insignificant' in terms of future site users, adjacent site users, plants and potable water supply prior to the operational phase.

Therefore, given the former military/commercial/industrial uses of the application site and its location overlying sensitive Groundwater Source Protection Zones 1, 2 & 3, appropriate safeguarding conditions must be applied to any planning consent, should permission be granted, to ensure the redevelopment will not represent an unacceptable risk to future/adjacent site users or the environment, including vulnerable groundwater receptors.

Please note, occupation of the site shall not be permitted prior to submission of a verification report to the LPA demonstrating completion of works set out in the approved remediation strategy and effectiveness of the remediation undertaken.

This department recommends the following conditions be attached:

#### CONDITIONS:

The development hereby permitted shall not be commenced until the following components of a scheme to deal with the risks associated with contamination of the site have been submitted to, and approved, by the local planning authority:

#### 1. Intrusive Investigation

a) An intrusive investigation and updated risk assessment shall be undertaken by competent persons and a written report of the findings shall be submitted to and approved in writing by the Local Planning Authority prior to commencement of the development. It shall include an assessment of the nature and extent of any contamination on the site, whether or not it originates on the site. The report of the findings shall include:

- (i) A survey of the extent, scale and nature of contamination;

equivalent to the capacity of the tank plus 10%. If there is more than one tank in the secondary containment the capacity of the containment should be at least the capacity of the largest tank plus 10% or 25% of the total tank capacity, whichever is greatest. All fill points, vents, gauges and sight gauge must be located within the secondary containment.

The secondary containment shall have no opening used to drain the system. Associated above ground pipework should be protected from accidental damage. Below ground pipework should have no mechanical joints, except at inspection hatches and either leak detection equipment installed or regular leak checks. All fill points and tank vent pipe outlets should be detailed to discharge downwards into the bund.

Reason: To ensure that the proposed development will not cause harm to human health or pollution of the environment, in accordance with DEFRA and Environment Agency document Model Procedures for the Management of Land Contamination (Contamination Report 11) and NPPF.

Kind regards,

Environmental Protection Team

Environmental Health | Thanet District Council Offices | Cecil Street | Margate | Kent | CT9 1XZ

*If you are interested in air quality please visit [www.kentair.org](http://www.kentair.org) for up to date information on latest pollution levels across the county.*