

MC/18/2505

Date Received: 23 August 2018

Location: Rochester Airport, Maidstone Road, Chatham, ME5 9SD

Proposal: Demolition of existing buildings (including control tower, old clubhouse, two portacabins housing the airport office and Skytrek office) and construction of a new control tower and hub building, ancillary car park, family viewing area and associated engineering operations

Applicant: Rochester Airport Limited

Agent: Mr Thomas Ogden,
Bloomfields,
77 Commercial Road,
Paddock Wood,
Tonbridge,
TN12 6DS

Ward: Rochester South & Horsted

Case Officer: Lichfields

Contact Number: 01634 331700

Recommendation of Officers to the Planning Committee, to be considered and determined by the Planning Committee at a meeting to be held on 19 December 2018

Recommendation – Delegate Approval with Conditions, subject to Highways England removing holding objection

The reasons for this recommendation for approval are given in the Planning Appraisal Section and Conclusions at the end of this report.

Conditions:

- 1) The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

Reason: To comply with Section 91 of the Town and Country Planning Act 1990 (as amended)

- 2) The development hereby permitted shall be carried out in accordance with the following approved plans:
 - Plan showing area to be demolished (206/P/303 Rev. A);
 - Indicative Proposed Plan (206/P304 Rev. A);

Reason: For the avoidance of doubt and in the interests of proper planning.

- 3) Prior to any ground works being undertaken, a site specific risk assessment should be submitted to and approved in writing by the Local Planning Authority that considers the potential risks from the presence of asbestos and the protective measures and methods of working.

Reason: To ensure that any asbestos is dealt with appropriately.

- 4) No development approved by this planning permission shall take place until a scheme that includes the following components to deal with the risks associated with contamination of the site has been submitted to and approved in writing by the local planning authority:
 - A) A preliminary risk assessment which has identified:
 - i. All previous uses;
 - ii. Potential contaminants associated with those uses;
 - iii. A conceptual model of the site indicating sources, pathways and receptors;
 - iv. Potentially unacceptable risks arising from contamination at the site.
 - B) A site investigation scheme based on (a) to provide information or a detailed assessment of the risk to all receptors that may be affected, including those off site.
 - C) The results of the site investigation and detailed risk assessment referred to in (b) 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.
 - D) 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 (c) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

The scheme shall be implemented as approved.

Reason: To protect the underlying groundwater from the risk of pollution and in accordance with the requirements of Policy BNE23 of the Medway Local Plan 2003 and the NPPF.

- 5) No occupation of any part of the permitted development shall take place until a verification report demonstrating completion of works set out in the approved remediation strategy and the effectiveness of the remediation has been 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. It shall also include a plan (a "long term monitoring and maintenance plan") for longer term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan. The long term monitoring and maintenance plan shall be implemented as approved.

Reason: To protect the underlying groundwater from the risk of pollution and in accordance with the requirements of Policy BNE23 of the Medway Local Plan 2003

and the NPPF.

- 6) If, during development, contamination not previously identified is found to be present at the site then no further development shall be carried out until the developer has submitted a method statement, and obtained written approval from the Local Planning Authority. The Method Statement must detail how this unsuspected contamination shall be dealt with.

Reason: To protect the underlying groundwater from the risk of pollution and in accordance with the requirements of Policy BNE23 of the Medway Local Plan 2003 and the NPPF.

- 7) No infiltration of surface water drainage into the ground is 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 that there is no resultant unacceptable risk to controlled waters. The development shall be carried out in accordance with the approved details.

Reason: To protect the underlying groundwater from the risk of pollution and in accordance with the requirements of Policy CF12 of the Medway Local Plan 2003 and the NPPF.

- 8) The development hereby permitted shall not be commenced until such time as a scheme to address the issues listed below has been submitted to, and approved in writing by, the local planning authority:
 - A) Pollution prevention at developments in a Source Protection Zone (storage and management of all potentially hazardous or polluting substances or materials); and
 - B) Surface and foul water drainage.

The approved surface and foul water drainage scheme shall be installed in accordance with the approved details prior to the first use of the development hereby permitted and shall thereafter be retained in accordance with the approved details.

Reason: To protect the underlying groundwater from the risk of pollution and in accordance with the requirements of Policy CF12 of the Medway Local Plan 2003 and the NPPF.

- 9) Should any sewer be found during construction works, all works on site shall be suspended while an investigation is undertaken to ascertain the condition of the sewer, the number of properties it serves, and the potential means of access to it. A report on that investigation shall then be submitted to the Local Planning Authority and no works on site shall be permitted to resume until the details of any measures required to be taken in relation to the discovered sewer have been agreed by the Local Planning Authority in consultation with Southern Water. Such measures shall be implemented to the reasonable satisfaction of the Local Planning Authority before the development is occupied.

Reason: To safeguard the existing public sewer infrastructure.

- 10) No development or new tree planting should be located within 3 metres either side of the external edge of the public sewer and all existing infrastructure should be protected during the course of construction works. No soakaways, swales, ponds, watercourses or any other surface water retaining or conveying features should be located within 5 metres of the public sewer.

Reason: To safeguard the existing public sewer infrastructure.

- 11) No development shall take place until a scheme showing details of the disposal of surface water, based on sustainable drainage principles, including details of the design, phasing (where appropriate), implementation, maintenance and management of the surface water drainage scheme have been submitted to and approved in writing by the Local Planning Authority.

Those details shall include (if applicable):

- a timetable for its implementation, and
- a management and maintenance plan for the lifetime of the development which shall include the arrangements for adoption by any public body or statutory undertaker, or any other arrangements to secure the operation of the sustainable drainage scheme throughout its lifetime.

Reason: To manage surface water during and post construction and for the lifetime of the development.

- 12) Prior to occupation of the development, a signed verification report carried out by a qualified drainage engineer (or equivalent) must be submitted to and approved by the Local Planning Authority to confirm that the Sustainable Drainage System has been constructed as per the agreed scheme and plans.

Reason: In accordance with paragraph 163 of the NPPF to ensure that suitable surface water drainage scheme is designed and fully implemented so as to not increase flood risk onsite or elsewhere.

- 13) A wastewater grease trap shall be provided on the kitchen waste pipe or drain installed.

Reason: To prevent pollution.

- 14) No development above foundation level shall take place until details and samples of materials to be used externally, including glazing, have been submitted to and approved in writing by the local planning authority. Development shall be carried out in accordance with the approved details.

Reason: To ensure that the appearance of the development is satisfactory and avoids harm to visual amenity in the locality, in accordance with Policy BNE1 of the Medway Local Plan 2003 and to avoid any hazard for pilots using the airport or air traffic control.

15) No element of the permanent lighting scheme shall be installed before full details have been submitted to and, in consultation with Rochester Airport, approved in writing by the Local Planning Authority. The approved lighting scheme is to be implemented as approved, and no subsequent alterations shall take place unless submitted to and, in consultation with Rochester Airport, approved in writing by the Local Planning Authority.

Reason: It is necessary to control the permanent lighting arrangements on this development to avoid confusion with aeronautical ground lights which could endanger the safe movement of aircraft and the operation of Rochester Airport. For further information please refer to Advice Note 2 'Lighting'. <http://www.aoa.org.uk/policy-campaigns/operations-safety/>

16) No part of the development hereby permitted shall be occupied until a Travel Plan has been submitted to and approved in writing by the local planning authority (who shall consult with Highways England) and implemented. The Travel Plan shall include arrangements for monitoring, review, amendment and effective enforcement.

Reason: To minimise traffic generated by the development and to ensure that the M2 Motorway/A2 Trunk Road continue to be an effective part of the national system of routes for through traffic in accordance with section 10 of the Highways Act 1980.

17) Prior to occupation of the development, a scheme for the provision of cycle stands shall be submitted to and approved in writing by the local planning authority, and the approved stands shall be in place prior to first occupation.

Reason: To encourage alternative means of travel other than the private car and in accordance with Policy T4 of the Medway Local Plan 2003.

18) No development above foundation level shall take place until a scheme of hard and soft landscaping, including boundary treatment/means of enclosure (including details of fencing), car parking layouts, other vehicle and pedestrian access and circulation areas, has been submitted to and approved in writing by the local planning authority in consultation with Rochester Airport, to ensure no risk of bird strike associated with the permanent scheme. This shall include external finishing materials, finished levels and construction details confirming materials, colours, finishes and fixings.

All boundary treatment and hard landscaping shall be implemented in accordance with the approved details before occupation of any part of the development. All planting, seeding and turfing shall be implemented in accordance with the approved details during the first planting season following occupation of the buildings or completion of the development, whichever is the earlier.

Reason: To ensure that the appearance of the development is satisfactory and avoids harm to visual amenity in the locality, in accordance with Policy BNE1 and BNE6 of the Medway Local Plan 2003.

19) Development shall not commence until a Construction Environmental

Management Plan (CEMP) has been submitted to and, in consultation with Rochester Airport, approved in writing by the Local Planning Authority covering the application site and any adjoining land which will be used during the construction period. Such a strategy shall include the following matters:

- A. Hours of construction working.
- B. Measures to control noise affecting nearby residents.
- C. Details of the area(s) subject to construction activity and the storage of materials and equipment including height of storage area for materials and/or equipment.
- D. Details of arrangements for the delivery of materials and construction equipment to the site.
- E. Details of cranes and other tall construction equipment, such as cherry picker machinery, if required (including the details of obstacle lighting)
- F. Such schemes shall comply with Advice Note 4 'Cranes' (available at <http://www.aoa.org.uk/policy-campaigns/operations-safety/>).
- G. Details and measures for the control of activities likely to produce dust and smoke
- H. Details of temporary lighting - Such details shall comply with Advice Note 2 'Lighting' available at <http://www.aoa.org.uk/policy-campaigns/operations-safety/>.
- I. Details and measures for the control and disposal of putrescible waste to prevent attraction of birds.
- J. Pollution incident control management.
- K. Site contact details in case of complaints.

The approved strategy (or any variation approved in writing by the Local Planning Authority) shall be implemented for the duration of the construction period.

Reason: To ensure the development is undertaken in a satisfactory manner and to avoid endangering the safe operation of aircraft.

20) Development shall not commence until a Wildlife Management Plan has been submitted to and approved in writing by the Local Planning Authority. The submitted plan shall include details of:

- A) Management of the flat-roof hub building which may be attractive to nesting, roosting and "loafing" birds (different management strategies may be required during and outside the breeding season);
- B) Physical arrangements for the collection (including litter bins) and storage of putrescible waste, arrangements for and frequency of the removal of putrescible waste to prevent attraction of birds. The Wildlife Management Plan shall be implemented as approved. No subsequent alterations to the plan are to take place unless submitted to and approved in writing by the Local Planning Authority. For further information please refer to Advice Note 3 'Wildlife Hazards'. <http://www.aoa.org.uk/policy-campaigns/operations-safety/>

Reason: It is necessary to manage the development in order to minimise its attractiveness to birds which could endanger the safe movement of aircraft and the operation of Rochester Airport.

21) Prior to the practical completion and first occupation of the development hereby approved, details of how the development will enhance biodiversity will be submitted to and approved in writing by the local planning authority. The approved details will be implemented and thereafter retained.

Reason: To enhance biodiversity, in accordance with Policies BNE1 and BNE6 of the Medway Local Plan 2003.

22) Prior to the commencement of any works on site, including demolition, details of the specification and position of fencing for the protection of any retained tree from damage before or during the course of development, shall be submitted to, and approved in writing by, the local planning authority. The tree protection measures shall be retained for the duration of the construction works associated with the development hereby permitted.

Reason: Pursuant to section 197 of the Town and Country Planning Act 1990 and to protect and enhance the appearance and character of the site and locality, in accordance with Policy BNE1 and BNE6 of the Medway Local Plan 2003.

23) No development shall take place (except as may be agreed in writing by the local planning authority) until a written specification and timetable for a programme of archaeological work has been submitted to and approved in writing by the local planning authority. Development shall be carried out in accordance with the approved specification.

Reason: To safeguard the archaeological interest in the site in accordance with Policy BNE21 of the Medway Local Plan 2003.

24) The development hereby permitted shall incorporate measures to minimise the risk of crime. No development above foundation level shall take place until details of such measures, according to the principles and physical security requirements of Crime Prevention through Environmental Design (CPTED), have been submitted to and approved in writing by the local planning authority. The approved measures shall be implemented before the development is first occupied and thereafter retained.

Reason: In the interest of security, crime prevention and community safety and in accordance with Policy BNE8 of the Medway Local Plan 2003 and the guidance within The Kent Design Initiative (KDI) and protocol dated April 2013.

25) The café shall not be open outside the hours of 08:00 to 22.30.

Reason: in the interests of local residential amenity.

Informatives to include:

- 1 The applicant's attention is drawn to AOA Advice Notes 1-5 and BS 7121: Part 1.
- 2 A formal application for connection to the public sewerage system is required in

order to service this development. Please contact Southern Water, Southern House, Sparrowgrove, Otterbourne, Hampshire SO21 2SW (Tel: 0330 303 0119) or www.southernwater.co.uk

Proposal

The application seeks full planning permission for the demolition of existing buildings (including control tower, old clubhouse, two portacabins housing the airport office and Skytrek office) and construction of a new control tower and hub building, ancillary car park, family viewing area and associated engineering operations.

The components within this current application previously formed part of an earlier application at the airport (ref. MC/17/3109) that, among other elements, also included a new paved runway. The airport is now not progressing with proposals for a new paved runway at this time. Instead, fresh applications have been submitted for the works now proposed, comprising the relocation of two helipads within the airport to include the provision of landing pads together with the decommissioning of an existing helipad (ref. MC/18/2509) and this application for the new control tower and hub building.

The Planning Statement submitted with this application confirms that the following works are proposed:

- The demolition of the existing control tower;
- The demolition of the structures housing the aircraft office and toilets;
- the demolition of the old clubhouse and a portacabin housing the flying schools;
- The erection of a new hub building incorporating the offices, administration facilities and the control tower required in connection with the operational requirements of the airport and the provision of toilets, a café area (with associated preparation area) and flying school offices and clubrooms to replace that lost as a consequence of demolition;
- The provision of 44 car spaces to the south of the hub building to replace those lost (circa 80) as a consequence of application MC/14/2914 being implemented and for visitors to the site, staff and users of the flying school. This is in addition to the parking area approved in application MC/14/2914, to the south of the MAPS building which will serve the MAPS building itself and will also provide a parking area for those visiting to fly their own planes;
- The provision of an outside landscaped family viewing area to the east of the hub building; and
- Associated engineering operations including the provision of fencing and gates to separate landside from airside and to ensure visitors to the site are kept to restricted areas only.

The applicant advises that key operational elements of the airport including aircraft type, numbers, flight lines and operational hours will remain as they currently are and will not be affected by the application proposals.

The proposed new control tower and hub building is to be located at the southern end of the 16/34 runway. The building has a footprint of 579 sq.m (GIA) and is single storey, plus the control tower above the western end of the building. The maximum height of

the tower 6.8m. The building is to be constructed from powder coated metal sheeting, and includes a feature glazed central section containing the café/restaurant.

A new car parking area is to be created to the south of the new control tower and hub building, to the north of the new Hangar 5. A family viewing area is proposed adjacent to the east of the new control tower and hub building.

It is noted that a number of the reports and documents submitted to accompany the application have not been updated and refer to previous, more expansive proposals at the airport.

Environmental Impact Assessment

The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 specify that EIA development:

“...means development which is either—

(a) Schedule 1 development; or

(b) Schedule 2 development likely to have significant effects on the environment by virtue of factors such as its nature, size or location”

The new control tower and hub building proposed at Rochester Airport does not fall within any of the categories of development defined within Schedule 1.

The development proposal is most closely related to development that falls within descriptions 10(b) or 10(e) in Column 1 of the table in Schedule 2, para. 1 of the EIA Regulations. Description 10(b) relates to urban development projects (which could include office development) where more than 1 hectare of land which is not residential is proposed. Description 10(e) relates to the construction of airfields where it involves an extension to a runway or the area of works exceeds 1 hectare. For completeness, description 13(b) also captures any change to, or extension of, these descriptions of development where it has already been carried out, if the thresholds and criteria for these descriptions apply to the change or extension, or if the development as changed or extended may have significant adverse effects on the environment.

As the proposed development would include much less than 1 hectare of urban development, it does not meet the threshold for description 10(b). Nor would the proposal meet the threshold for description 10(e), given that the area of the works is much less than 1 hectare.

However, in light of description 13(b), it is still prudent to consider whether the proposal is likely to result in significant adverse effects on the environment. The decision on whether significant effects are likely is the screening process and should be carried out with reference to the various selection criteria in Schedule 3 of the EIA Regulations.

Further guidance is provided in the Planning Practice Guidance which states that:

“Each case should be considered on its own merits in a balanced way.” (Ref ID: 4-018-20170728)

It also adds in the same section: *“Only a very small proportion of Schedule 2 development will require an environmental impact assessment”*. The Planning Practice Guidance also provides a set of indicative thresholds and criteria which are intended to aid local planning authorities to determine whether a project is likely to have significant environmental effects. It is noted that, in respect of description 10(e), the indicative thresholds are identified as:

“New permanent airfields and major works (such as new runways or terminals with a site area of more than 10 hectares) at existing airports. Smaller scale development at existing airports is unlikely to require Environmental Impact Assessment unless it would lead to significant increases in air or road traffic.”

The Planning Practice Guidance also states that the key matters for consideration are those relating to noise, traffic generation and emissions.

Taking account of the relevant law and guidance, the Council has taken a precautionary approach and considered whether to request an EIA for this latest proposal, even though the criteria for descriptions 10(b) and 10(e) are not met. The report attached at Appendix 1 therefore undertakes a comprehensive review of the need for an EIA by reference to:

- The characteristics of the development;
- The location of development; and
- The nature of the potential impact(s).

As a result of this assessment, a screening opinion dated 10 December 2018 confirms that an EIA is not required for the current proposals.

Relevant Planning History

MC/14/1178 Town and Country Planning Act (Environmental Impact Assessment) (England and Wales) Regulations 2011 - request for a screening opinion as to whether an Environmental Impact Assessment is necessary for the formation of a paved lit runway to replace 02/20 measuring 830 metres in length and 25 metres in width together with a new parallel grass runaway for use by historic aircraft and landscaped bund. The refurbishment or replacement of Hangar 3, new control tower, new hub building with MAPS hangar, fuel pump island, vehicle parking and aircraft storage together with additional hangars and buildings with associated parking.
Decision: EIA required, 19 May 2014

MC/14/2159 Town and Country Planning Act (Environmental Impact Assessment) (England and Wales) Regulations 2011 - request for a screening opinion as whether an Environmental Impact Assessment is necessary for the formation of a paved lit runway to replace 02/20 measuring 830 metres in length and 25 metres in width together with a new parallel grass runaway for use by historic aircraft and landscaped bund. The refurbishment or

replacement of Hangar 3, new control tower, new hub building with MAPS, fuel pump island, vehicle parking and aircraft storage together with additional hangers and buildings with associated parking.

Decision: EIA not required, 18 August 2014

Secretary of State Direction: EIA required, 26 May 2016

- MC/14/2914 Full planning application for erection of two hangars, erection of new hangar for Medway Aircraft Preservation Society, erection of fencing and gates, formation of associated car parking areas, fuel tank enclosure, ancillary works and a memorial
Decision: Planning Permission granted, 16 March 2017
- MC/16/4534 Town and Country Planning (Environmental Impact Assessment) Regulations 2011 - request for a Scoping Opinion in respect of an Environmental Impact Assessment at Rochester Airport for the formation of a replacement paved lit runway and parallel grass runway (including a landscaped bund), the demolition, replacement and refurbishment of existing buildings and associated works.
Decision: Scoping Opinion issued, 27 February 2017
- MC/17/0931 Full planning application for construction of office building with associated parking for use by Kent, Surrey & Sussex Air Ambulance Trust.
Decision: Planning Permission granted, 14 June 2017
- MC/17/2323 Lawful Development Certificate (Existing) for the construction and existing use of two helipads and a hangar for aviation purposes.
Decision: Certificate issued, 24 August 2017
- MC/17/4013 Lawful Development Certificate (proposed) to extend the existing helipad and remove existing hanger doors and replace with wider doors.
Decision: Certificate issued, 12 February 2018
- MC/17/3109 Full planning application for formation of a replacement paved lit runway and parallel grass runway (including a landscaped bund), demolition of existing buildings (including control tower, two portacabins housing the airport office and Skytrek office), re-siting of helipads and construction of a new control tower and hub building including the provision of a family viewing area.
Application withdrawn, 26 July 2018
- MC/18/2556 Town and Country Planning Act (Environmental Impact Assessment) Regulations 2017 - request for a screening opinion for the demolition of existing buildings (including control tower, two portacabins housing the airport office and Skytrek office), construction of a new control tower and hub building including

the provision of a family viewing area proposed development of
Rochester Airport
EIA not required 10 December 2018

MC/18/2509 Full planning application for relocation of two helipads within the
airport to include the provision of landing pads together with the
decommissioning of an existing helipad.
On this agenda

Representations

The application was validated on 12 September 2018. The application was advertised in the local press and on site. Consultations were undertaken with statutory and other consultees, including Tonbridge & Malling Borough Council, Aylesford Parish Council, Burham Parish Council, Wouldham Parish Council, Highways England, The Civil Aviation Authority, The National Air Traffic Service, London Southend Airport, The Kent Downs AONB Unit, Southern Gas Networks, Southern Water Services and EDF Energy. Local residents in the surrounding area and interested parties were also notified of the application.

Consultee Responses

National Air Traffic Service (NATS) anticipates no impact from the proposals and has no comments to make on the application.

Kent County Council Biodiversity confirmed they were satisfied with the conclusions of the preliminary ecological appraisal, and satisfied that the proposed development has limited potential to impact on protected/notable species. The application provides opportunities to incorporate features into the design which are beneficial to wildlife, and they recommend that bird and bat boxes are erected within the site boundaries to enhance the site for biodiversity.

Highways England has assessed the application, and concluded that the proposal is unlikely to have any severe residual impacts on the strategic road network in terms of traffic increases. A condition should be attached requiring a Construction Environmental Management Plan. As a minimum, this should restrict construction traffic to travel outside of the network peak periods and provide wheel washing facilities where necessary. He stated that on the basis of the material changes that would need to occur to facilitate the proposal, ie. The development proposals would require the closure of Runway 16/34, the applicant needs to carry out a Design Manual for Roads & Bridges (DMRB) compliant risk assessment and, as appropriate, put forward proposals to avoid or mitigate any risks to the safe operation of the Strategic Road Network (SRN)

Natural England requested a detailed assessment of the potential impacts of the proposal on the Kent Downs AONB.

Southern Water drew attention to the approximate position of a public sewer within the site. The exact position of the public sewer must be determined by the applicant before the layout of the proposed development is finalised. Conditions should be imposed to protect the drainage apparatus and to provide details of the proposed

drainage solution. An informative was requested regarding the need to apply for a connection to the public sewer.

Lead Local Flood Authority (LLFA) advised that as the risk of oil/fuel etc. spillage is high, soakaways are unlikely to treat water sufficiently. In this case they would like to see alternative/additional schemes and not rely only on the proposed oil interceptors. SuDs such as permeable paving could be utilised to manage water quality as could the installation of swales or filter strips. Recommend the use of rainwater harvesting, grey water recycling and water butts where practicable in order to provide an additional means of surface water attenuation as well as reduced demand on potable water supplies. Conditions required relating to the drainage details, including a maintenance schedule in place for the lifetime of the development to maintain any SuDs which serve it.

Gravesham Borough Council has no objections to the proposals.

Kent Police have no comments to make on the application. They would welcome the opportunity to meet within the applicant/agent to discuss security of the proposed buildings.

Historic England advised that they had no comments to make on the proposed development.

Objections

A total of 25 representations objecting to the proposals or raising concerns have been received.

A summary of the main issues raised by the objections is set out below.

- An EIA is essential.
- Avoiding EIA through piecemeal development.
- Independent public safety, noise impact and air quality assessment required.
- The development will mean the closure of the 16/34 runway which will impact on public safety, noise, air quality and increase flight activity on runway 02/20.
- No explanation of why additional buildings necessary.
- Object to closure of runway 16/34 as this is a vital safety feature.
- Improved facilities could increase air movements.
- There should be a cap imposed on total air movements (25,000 pa suggested).
- Noise information submitted with application inaccurate.
- Application changes the existing configuration of the airport.

Highways England maintains an objection to the scheme until they have received and agreed the safety impact information.

Support

A total of 24 comments supporting the proposals have been received.

The main reasons for supporting the application include:

- Good for business in Rochester and wider Kent.
- Existing buildings are in much need of improvement.
- Proposed layout would be more welcoming.
- Better public access and facilities would help all the present users of the site, particularly the cafeteria.
- The modernisation of the Airport creates skilled and sustainable employment.
- Will benefit the local area and attract more visitors.
- Modernisation is important to supporting the history of aviation.

Development Plan

The Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the development plan, unless material considerations indicate otherwise. The development plan consists of the saved policies of the Medway Local Plan 2003. The policies referred to within this document and used in the processing of this application have been assessed against the National Planning Policy Framework 2018 and are considered to conform with it.

The Medway Council Local Plan Development Strategy consultation document (March 2018) is a material consideration, but as it is at the early stage of preparation of the new Local Plan, only limited weight can be attached to this document.

The Rochester Airport Masterplan (2014) has been adopted by the Council, and provides a framework for the evolution of development proposals at the Airport. The Masterplan is a material consideration but does not constitute an adopted Supplementary Planning Document.

The National Planning Policy Framework (NPPF) constitutes a material consideration. Para. 10 of the NPPF states:

“So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development”

Para. 11 continues:

“For decision-taking this means:

c) Approving development proposals that accord with an up-to-date development plan without delay; or

d) Where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

ii. Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”

The application should be approved without delay if it accords with the development

plan, unless of course other material considerations indicate otherwise.

The policy specifically relating to Rochester Airport within the adopted Local Plan (S11) has not been saved, although saved Policy ED5 'Proposed Employment Areas' lists Rochester Airfield (25 ha) as being allocated for business (Class B1), general industry (Class B2) and storage and distribution (Class B8) development. Policy T23 'Aviation Related Development' also specifically relates to development at Rochester Airport.

Other Guidance

- Rochester Airport Masterplan (2014)
- Medway Council Parking Standards (2004)

Planning Appraisal

The proposals that are currently under consideration solely relate to the demolition of existing buildings (including control tower, old clubhouse, two portacabins housing the airport office and Skytrek office) and construction of a new control tower and hub building, ancillary car park, family viewing area and associated engineering operations.

The applicant has stated that the reason for the development is to modernise the buildings to serve the needs of existing occupants and users of the airport. The applicant states that the proposed development will provide a deliverable, sustainable redevelopment of part of Medway Council's greatest assets without changing the key operational elements of the airport, including craft type, numbers, flight lines and operational hours.

The new location for the airport control tower would be a more appropriate location compared with the existing location, providing an improved clear and unobstructed view of the entire movement area of the airport and of air traffic in the vicinity of the airport. The orientation would not give rise to sun glare. The tower would be a contained site and not immediately accessible from public areas such as the Family Area or the approved Memorial Gardens. This meets civil aviation airport design guidance.

The upgraded facilities would be an improvement on the existing operational environment, providing a safer and more efficient operational airport. The applicant proposes greater demarcation than currently exists between operational airside areas and landside areas, which would improve public safety throughout the site.

A portion of the application red line area, where the hub building and helipads are proposed, would encroach onto the southern end of the existing cross runway.

Continued use of the cross runway would not be possible with the proposed development encroaching onto the runway end. The airport has already received Preliminary Notice from Medway Council via the terms of the lease to close this runway irrespective of the outcome of this application.

The issues that are relevant to the proposals solely relate to the impact of the elements currently under consideration. Any plans that might be brought forward in future for the expansion of the airport by adding more runway capacity will need to be subject to a separate application and scrutiny at a later date, including in relation to EIA.

As noted above, a number of objectors to the revised application stated that an EIA is required for the current proposals. These comments are covered in more detail in the attached screening report at Appendix 1, which concludes that *“there is no justification for seeking an EIA for the current development due to its relationship to future aspirations at the airport.”*

The main issues for consideration are:

- Principle of the proposed development;
- Design and appearance;
- Noise and air quality;
- Ecology;
- Contamination;
- Highways; and
- Heritage and archaeology.

As part of the current application, it is not a requirement to consider the potential impacts of the number of aircraft movements, as these will not increase as a direct result of these proposals.

Intrinsic to the assessment of these issues is whether the proposal complies with local and national policy.

Aeronautical Review

Although the current application relates only to the erection of a new control tower and hub building, Lichfields has produced an independent Aeronautical Review considering the proposals against aeronautical regulations and guidance, and to identify and assess any aeronautical and safeguarding impacts. This Review also considered the current application for relocation of the helipads (ref. MC/18/2509).

The conclusions of this Review are as follows:

“The proposed development would not result in any change to aircraft type, numbers, flight lines or operational hours from the current operation and hence no elevated incidence of risk. There is no runway infrastructure development proposed to either Runway 02/20 (the main runway) or Runway 34/16 (the cross runway).

The application relates to modest airport and airport-related facilities contained within the airport operational area. The proposed development will not give rise to any impact on runway operations.

It is considered that the upgraded facilities would be an improvement to the existing operational environment, providing a safer and more efficient operational airport.

There is no potential for significant environmental effects associated with public safety

and risk giving rise to a need for EIA.

Given the above there is no requirement for a public safety and risk assessment in relation to the proposed development.

No Aerodrome Safeguarding issues would arise subject to:

- *A condition requiring a Construction Management Plan that sets out how dust, waste and lighting impact arising from construction shall be managed such to not give rise to the attraction of birds and an increase in bird hazard risk on the application site, as well as give rise to creating a distraction for pilots and occupants of the control tower.*
- *An Informative is suggested drawing the applicant's attention to AOA Advice Notes 1-5 relating to aerodrome safeguarding and BS 7121: Part 1 relating to crane use'.*

The Aeronautical Review considered the implications of the closure of runway 16/34 from an aeronautical perspective, and commented that:

'The airport is required to close its cross runway in accordance with the terms of its lease with Medway Council. It is understood that the airport has already received Preliminary Notice from Medway Council of the closure. As such, the closure will occur, irrespective of whether or not either application is approved. The closure is likely to occur between December 2018 and April 2019, subject to three months' notice (in accordance with the Preliminary Notice).

The airport operates in visual flight rules rather than instrument flight rules. Runway 34/16 is a cross runway and Runway 02/20 is the main runway. There is also a relief runway adjacent to Runway 02/20.

The cross runway currently provides the airport with a greater usability factor during periods of changing wind conditions, by providing an alternative runway to support aircraft with a certain maximum cross wind component that are unable to land or take-off on the main runway.

The airport is not required to define the split of traffic between the two runways to the Civil Aviation Authority (CAA) nor is it currently subject to any planning controls by the local planning authority.

Closing the cross runway will reduce the airport's usability factor. It would not be the case that all cross-runway traffic would be diverted to the main runway: of the aircraft that are less susceptible to changing wind conditions, these aircraft can already opt to use either runway; and those aircraft types that are susceptible to changing wind conditions may not be able to use the airport to land and take off, meaning as a consequence a possible reduction in total aircraft movements'.

In terms of public safety and risk, the Aeronautical Review concludes:

'It is considered that a public safety and risk assessment, to understand safety impact, is not required to support an application for the proposed rather modest works for the following reasons:

- *The proposed development would not result in any change to aircraft type, numbers, flight lines, operational hours and therefore an elevated incidence of risk, including to users of the motorway.*
- *The proposed works relate to airport and airport-related facilities only. There is no runway infrastructure proposed to either Runway 02/20 (the main runway) or Runway 34/16 (the cross runway).*
- *It is considered that the upgraded facilities will improve the existing operational environment, providing a safer and more efficient operational airport.*
- *The applicant proposes greater demarcation than currently exists, via the proposed layout and fencing between operational airside areas and landside areas, which would improve public safety throughout the site.*
- *The airport intends to close Runway 34/16 to accord with the terms of its lease and has already received Preliminary Notice to do this. Closing the cross runway would reduce the airport's usability factor. It would not be the case that all cross-runway traffic would be diverted to the main runway: of the aircraft that are less susceptible to changing wind conditions, these aircraft can already opt to use either runway; and aircraft that are susceptible to changing wind conditions may not be able to use the airport to land or take-off, meaning as a consequence a possible reduction in total aircraft movements.*
- *It is considered that there would be no impact to the main runway as a result of the proposed development.*
- *There is no potential for significant environmental effects associated with public safety and risk giving rise to a need for EIA, which has been confirmed by way of two Screening Opinions undertaken by Medway Council'.*

Principle of the Proposed Development

The applicant proposals seek to support the airport's operation by providing a new control tower and hub building, and will create a clearer demarcation between the airport's airside and non-airside activities.

Paragraph 104 of the NPPF states that planning policies should:

“Recognise the importance of maintaining a national network of general aviation airfields, and their need to adapt and change over time – taking into account their economic value in serving business, leisure, training and emergency service needs, and the Government's General Aviation Strategy.”

Although the policy (S11) within the adopted Medway Local Plan (2003) specifically relating to Rochester Airport has not been saved, Policy T23 deals with aviation-related development, and states that development at Rochester Airport will be considered against the following criteria:

- Compatibility with existing or potential aviation operations;
- The scale and nature of the proposed development, taking account of the existing amount of activity on the site;
- The economic and employment benefits of the development;
- The proposals for a science and technology park at Rochester Airport in policies [S11 and] ED5;

- the impact upon residential and other noise-sensitive properties;
- Traffic generation;
- Other environmental and social impacts; and
- Accessibility from the urban area of Medway.

Draft Policy T4 of the Medway Council Local Plan Development Strategy (Draft March 2018) specifically relates to Rochester Airport, and states:

“Rochester Airport will be safeguarded to provide an enhanced aviation facility for business, public service, training, heritage and leisure uses, and support the development of a strategic gateway and an economic hub.

Proposals will need to demonstrate how any impacts will be mitigated, including air quality, noise, traffic, and amenity.”

Rochester Airport is a long-established aviation site, and it is clear that the Council’s stated policy position and intention is that this should be maintained and enhanced as an important local facility. Airport-related improvements at Rochester Airport are therefore supported in principle, provided that impacts can be adequately mitigated.

The development will not alter the character of the airport’s general operations. In particular, the provision of the new control tower and hub building will not alter the existing role of the airport or the size and type of aircraft using the airport. It is therefore considered that the general principle of the proposed development is acceptable and complies with adopted and emerging policy relating to Rochester Airport.

The proposed building incorporates a new café/restaurant, and a family viewing area. These elements seek to encourage visitors to the airport. Enhancing the leisure offer of the airport is in accordance with local plan policy. A condition is proposed to limit the opening hours of the café/restaurant, to minimise disturbance and ensure there is no adverse impact on local residential amenity.

Design and Appearance

The development is located in close proximity to the Kent Downs Area of Natural Beauty (AONB). The nature and form of the proposals that are the subject of this planning application are confined to development within the boundary of the existing Rochester Airport. The existing control tower is 6m tall. The proposed control tower is 6.8m at its highest point. However, the building is being moved further away from the AONB. Moreover, the building will generally be screened from public vantage points from outside the airport, either by the existing and proposed hangars within the airport (between 8m and over 12m tall) and the adjoining Innovation Centre buildings, or by the trees along the perimeter of the airport at its southern end. The construction and operation of the new control tower and hub building is capable of being brought forward without giving rise to significant environmental effects on the AONB, or causing harm to landscape quality and views locally.

The proposed control tower and hub building would be of a functional design and appearance, and typical of buildings to be found within a general aviation airport. Having regard to the siting of the proposed building, its scale is appropriate and will

not be out of context with existing development in the area. Its design and appearance is acceptable and there is therefore no conflict with the provisions of Policy BNE1 of the Local Plan or the NPPF's promotion of high-quality design.

The proposed new control tower and hub building will allow for the demolition and removal of a number of the existing temporary buildings and structures that are in a poor state of repair. Overall, this will lead to an improvement in the appearance of the airport.

While it is likely that external lighting would need to be installed in association with this development, it can be of a scale that would not be visually intrusive. This is a matter that can be controlled by the imposition of a planning condition, to ensure that there is no conflict with policies BNE1 and BNE5 of the Medway Local Plan.

Conditions are also proposed relating to hard and soft landscaping, to ensure that the visual appearance of the development is satisfactory, in accordance with Policy BNE1 of the Medway Local Plan.

Noise and Air Quality

As stated above, the proposed new control tower and hub building will not itself generate additional aircraft movements in the area or alter the hours of operation. Accordingly, it is not considered that the proposal will have an adverse effect on the AONB's tranquillity.

The proposed new building, at the southern end of the airport site, is distant from any residential properties. As noted above, a condition is proposed to restrict the opening hours of the café/restaurant to minimise disturbance.

The airport intends to close runway 16/34 via the terms of its lease, and it is intended to close the runway whether or not planning permission is granted for the current planning application. In terms of noise impacts arising from the closure of runway 16/34, as noted above, this would not result in all cross-runway traffic being diverted to the main runway, and could lead to a possible reduction in total aircraft movements.

Rochester Airport is not located within an Air Quality Management Area. As the new control tower and hub building will not affect aircraft movements, it is considered that this development will have no adverse effect on the area's air quality and as such there will be no conflict with Policy BNE24 of the Local Plan.

A condition is proposed requiring a Construction Method Statement to ensure that measures are in place to control the emission of dust and dirt, and noise and vibration during demolition and construction.

Policy BNE2 of the Local Plan seeks to ensure that the occupiers of properties that adjoin new development do not experience unacceptable noise disturbance. Paragraph 180 of the NPPF states that planning decisions should '*... mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life ...*'. For the reasons given above it is considered that there will

be no conflict with Policy BNE2 of the Local Plan or paragraph 180 of the NPPF.

Ecology

Kent County Council Biodiversity confirmed they were satisfied with the conclusions of the preliminary ecological appraisal, and satisfied that the proposed development has limited potential to impact on protected/notable species, and advised that there is no requirement to undertake any further surveys for the presence of protected species.

The application provides opportunities to incorporate features into the design which are beneficial to wildlife, and they recommend that bird and bat boxes are erected within the site boundaries to enhance the site for biodiversity. This is in line with para. 175 of the NPPF, which encourages opportunities to incorporate biodiversity improvements in and around developments, especially where this can secure measurable net gains for biodiversity. A condition is proposed to secure such enhancements, in accordance with the NPPF.

The proposed development therefore raises no issues relating to protected species and there is no conflict with the provisions of Policies BNE37 or BNE39 of the Local Plan.

No trees are being removed as part of the current application proposals. In order to safeguard the well-being of trees to be retained within the vicinity of the works, a condition requiring the implementation of tree protection measures is recommended.

Contamination

The Environment Agency has not commented on this application, but previously identified (in relation to application ref. MC/14/2914) that the site overlies a principal aquifer and is within the Source Protection Zone (SPZ) for a public water supply abstraction point. The NPPF (para. 170) states that planning policies and decisions should contribute to and enhance the natural and local environment by preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability.

The EA therefore previously suggested a number of conditions in order to protect the underlying groundwater from the risk of pollution, to accord with Policy BNE23 of the Medway Local Plan and NPPF requirements.

Medway Council Environmental Protection recommend a condition for a Construction Environmental Management Plan (CEMP) and conditions regarding potential contamination.

Preliminary investigations undertaken on the applicant's behalf have identified the application site as having the potential to be contaminated because of its historic use. As a result, there is a requirement for the applicant to undertake on-site investigations in association with the proposed development. This includes a site specific assessment that considers the potential risks from the presence of asbestos. Planning conditions to address this work are recommended. With the imposition of appropriate

conditions the proposed development is unobjectionable under the provisions of Policy BNE23 of the Medway Local Plan.

Highways

The proposed development will provide upgraded facilities, primarily for existing users of the airport. The construction of the new control tower and hub building is not of itself expected to be a significant traffic generator, however there is expected to be an increase in visitors using the café/restaurant and family viewing area.

It is reasonable to assume that the proposed development will not generate any significant additional traffic movements to and from the airport, and the transport impact associated with the development will not be significantly greater than current movements. Vehicles associated with the demolition and construction of the proposed development are capable of being managed through normal traffic management procedures and are unlikely to be unusual in their number or type.

Highways England confirmed that the proposal is unlikely to have any severe residual impacts on the strategic road network in terms of traffic increases. A condition should be attached requiring a Construction Environmental Management Plan. As a minimum, this should restrict construction traffic to travel outside of the network peak periods and provide wheel washing facilities where necessary.

Given the nature of the application proposals it is considered that the proposed development would not be a significant traffic generator, with the result that there would be no adverse effects for the operation of the local highway network. The application proposals therefore accord with Policy T1 of the Medway Local Plan.

A condition is recommended seeking the provision of secure cycle parking facilities within the development site, for use by staff and visitors to the airport, in accordance with Policy T4 of the Medway Local Plan.

Highways England has raised the issue of whether the proposals could have the potential to impact on the safe and efficient operation of the strategic road network, in this case particularly the M2 in the vicinity of junction 3. HE has requested that the applicant needs to carry out a Design Manual for Roads & Bridges (DMRB) compliant risk assessment and, as appropriate, put forward proposals to avoid or mitigate any risks to the safe operation of the SRN. The applicant has commissioned an assessment, and the results of this should be reported at the Committee meeting.

Heritage and Archaeology

Rochester Airport has some interest associated with its previous use, particularly during the Second World War. However the site is not located within a conservation area and contains no designated heritage features.

The application is accompanied by an archaeological desk-based assessment. The application site lies in an area where there is some evidence of prehistoric and Romano-British activity and the airfield itself is of some historic interest dating back to the early 1930s and then into the WW2 period. The applicant's archaeological study

recommends that historic building recording and archaeological monitoring and investigation are undertaken and appropriate conditions are recommended to cover these matters. With the imposition of such conditions it is considered that the application proposals accord with the provisions of Policy BNE21 of the Local Plan.

Other Matters

The airport is in the ownership of Medway Council and is leased to the applicant, however, this is not a material planning consideration. There are no local finance considerations applicable to the proposal.

South East Local Enterprise Partnership funding is potentially available for some of the works proposed by the applicant. The availability of that funding is, however, not material to the determination of this planning application.

Safety concerns have been raised in relation to the closure of runway 16/34. The issue of operational aviation safety for licensed airfields is a matter for the CAA. As part of that, the built development associated with the submitted application will also require consent through the licencing regime administered by the CAA.

Conclusions and Recommendation

For the reasons stated above, it is considered that the proposed development is acceptable and accords with local and national policy. The application is therefore recommended for approval, subject to the results of the risk assessment and Highways England removing their holding objection.

This application would normally be determined under delegated powers but is being referred to the Planning Committee for determination due to the extent of the representations received expressing a view contrary to the recommendation.

Appendix 1: EIA Screening