

Wouldham **TM/14/02015/FL**
Burham Eccles Wouldham

First floor rear addition at 324 Pilgrims Way Wouldham Rochester Kent ME1 3RB for Mrs Fran Holgate

Additional Information: Since the Members' Site Inspection, an amended plan has been submitted which shows the proposed first floor extension without the permitted development scheme as previously shown. This has been provided for the avoidance of any doubt and to highlight that it is only the first floor addition that is to be formally considered.

RECOMMENDATION REMAINS UNCHANGED

Ditton **TM/13/03692/FL**
Ditton

Erection 32 no. dwellings, access road, car parking and landscaping at Bellingham Way, Aylesford, Kent at Ferns Surfacing Ltd Larkfield Depot Bellingham Way Larkfield Aylesford Kent for Ferns Surfacing Ltd

No supplementary matters to report.

Wouldham **TM/14/03341/FL**
Burham Eccles **TM/14/03594/CNA**
Wouldham

Hybrid Application: A: Formation of a lit paved runway with parallel grass runway, formation of grassed bund, re-siting of helipads, erection of two hangars, a hub building with control tower and associated building, erection of fencing and gates, formation of associated car parking areas, fuel tank enclosure, family viewing area and a memorial garden (detailed submission) plus demolition of a range of structures (identified on plan) and removal of portable structures and B: Identification of future development site (outline submission) land to the east of hangers 5 and 6 at Rochester Airport Maidstone Road Chatham for Rochester Airport Ltd

Since the main Agenda was published a number of matters have arisen including matters of clarification, queries made to the applicant and representations received. As a result revised Recommendations are set out below but essentially application **TM/14/03341/FL**

is **WITHDRAWN FROM THIS AGENDA** and will be reported to Committee at the appropriate time (when there will be a full opportunity for public speaking). However, there is a recommendation in respect of **comments to be made to Medway Council in respect of TM/14/03594/CNA**. The matters described below will form part of both the Borough Council's consideration of TM/14/03441/FL in due course and also the matters to be raised with Medway Council in respect of TM/14/03594/CAN.

KCC Archaeology: Archaeological and historical background: The proposed development site lies in an area of archaeological and historical interest relating to past discoveries of ancient archaeological remains in the general vicinity and arising from the site's more recent use as an airfield.

Past archaeological discoveries to the south and west of the site have revealed evidence for archaeological activity of prehistoric and Romano-British date. These remains include a Roman inhumation to the south of the airfield. The burial comprised a skeleton accompanied by grave goods, including two vases. It is possible that further evidence for prehistoric and Romano-British activity may extend into the site in question.

Rochester Airfield was itself established in the 1930s, initially developed by Rochester Council, the airfield was quickly taken over by Shorts Brothers who began flying from the site in c. 1934-35. The site was used for test-flights, a flying school and also hosted civilian flights to Southend.

In the Second World War Shorts Brothers had a factory at the airfield which was used for the production of Stirling Bombers. Whilst no operational squadrons were based there a number of planes made emergency landings at Rochester. Although not an operational military airfield, the Rochester site was an important manufacturing site and as such was bombed on a number of occasions. Anti-aircraft defences were installed at the site and there were a number of air-raid shelters to provide accommodation for factory workers. A number of buildings relating to Short's use of the site survive, including hangers, air-raid shelters and other ancillary buildings. Of particular note is Hangar 3, built in 1939, for No. 23 Elementary and Reserve Flying Training School. I welcome the proposals to retain this building as part of the airport redevelopment.

Recommendations: The submitted Archaeological Desk-Based Assessment concludes that the site has a "...low to moderate possibility that archaeological remains of regional significance could be extant within the proposed development area. There is a moderate to high possibility that archaeology relating to the Second World War may be uncovered, especially in the northwest part of the site earmarked for future development" and I would agree with this conclusion.

The Desk-Based Assessment goes on to make recommendations for actions required to mitigate the impact of the development works on the site's historical and archaeological interest. The recommended works include historic building recording, archaeological monitoring, evaluation and investigation. Such works could be secured through the

inclusion of suitable planning conditions as part of any forthcoming planning consent.

Planning policy considerations

Paragraph 6.2 of the main report references the Medway Council produced Masterplan for the Airport, and its association with policy S11 of their adopted plan. It has now been established that this is no longer correct, so to clarify, policy S11 IS NOT A SAVED POLICY. It can, therefore play no part in the consideration of either planning application. However it must be noted that the Saved Policies of the Medway Local Plan 2003 includes an aviation related policy (T23).

An extract from the Medway Local Plan is set out below, including the policy text:

“The local plan is proposing to develop a science and business park at Rochester Airfield which would result in the closure of one of the main runways. However, with the appropriate investment in the remaining runway and other aviation related facilities within the airport, the level of activity could increase. Policy T23 therefore sets out the criteria against which any future proposals for aviation related development will be measured. Such criteria would also apply to any proposals for new general aviation facilities within the plan area.

POLICY T23: AVIATION RELATED DEVELOPMENT

Development proposals at or affecting Rochester Airport and any proposed new aerodromes, will be considered against the following criteria:

- (i) compatibility with existing or potential aviation operations;***
- (ii) the scale and nature of the proposed development, taking account of the existing amount of activity on the site;***
- (iii) the economic and employment benefits of the development;***
- (iv) the proposals for a science and technology park at Rochester Airport in policies S11 and ED5;***
- (v) the impact upon residential and other noise sensitive properties;***
- (vi) traffic generation;***
- (vii) other environmental and social impacts; and***
- (viii) accessibility from the urban area of Medway.”***

Other factors

By way of an update to Members on the current position in respect of the planning application for determination by TMBC, I can advise that since publication of the main Agenda, we have received some initial and detailed feedback from our independent noise consultant which identifies that a number of matters have emerged in his initial assessment that require further clarification in respect of matters of both appropriate noise policy considerations and application of noise testing/projection methodology. The technical points raised with the applicant have also been shared with Medway Council's case officer. The responses to these points will be referred to our independent noise consultants and the assessment on noise matters will form a key factor in the report that is eventually prepared for TMBC Committee on TM/14/03441/FL.

The applicant's agent has now clarified that the outline element of the application relates only to the area to the east of hangars 5 and 6. It was possible that, on one reading of the proposal description and accompanying documents, the land that currently forms part of runway 16/34 was also included in the applications – but this is not the case. An amended plan has been received with revised red and blue lines around the relevant pieces of land. The description of the planning application has also been amended so that it makes it clear that outline permission is sought on land east of hangars 5 and thus the proposal is a hybrid application. In association with the proposals for these two Rochester Airport applications various procedural matters have been raised by those making comment on the applications and which they believe should be viewed as material considerations in the determination of the applications. These are outlined below and should be drawn to the attention of Medway Council. Where appropriate they will also be addressed in the subsequent report to APC3.

Application status

Mention has been made, by some parties, of the status of the full planning application. It has been implied that the application should be considered as a Nationally Significant Infrastructure Project (NSIP) which would fall to be dealt with by the Planning Inspectorate and not the LPA. In planning terms whilst this application is of local significance, it is a conventional planning application to be decided by the relevant Local Planning Authority. It does not meet the relevant *statutorily defined criteria* to be treated as an NSIP.

Environmental Impact Assessment

It is understood from Medway Council that a local resident has contacted the DCLG regarding the validity of Medway Council's Environmental Impact Assessment (EIA) screening opinion of 2nd September 2014. To date, TMBC has not seen any formal papers relating to such a challenge and are not aware of any response from the DCLG team. Any feedback that is received from Medway will be reported to the Committee members when application TM/14/03341/FL is considered by APC3, along with any relevant legal guidance.

Rochester Airport Options Study

Reference has been made to the Rochester Airport Options Study (August 2012), commissioned by Medway Council's Asset and Property Services and produced by TPS which outlined options for the future of Rochester Airport. This document examined potential aerodrome layouts to enhance the viability of Rochester Airport through the implementation of a paved runway and the release of land for commercial development by the closure of one of the airports existing main runways. This report includes details about capital expenditure associated with the options for the runway, aerodrome safeguarding and airport planning criteria. This document includes aspirations and compares options for the possible changes to the runways. This document was not submitted in support of the current application and would appear to carry little weight with regard to the current application before Medway for determination.

Runway operational matters

The proposed paved runway is not considered by some residents to be Civil Aviation Authority (CAA) compliant, as no approval documents have been provided by the applicants. Reference has also been made to other aspects of aerodrome safeguarding as outlined by CAA requirements, including Runway End Safety Areas (RESA), Obstacle Limitations Surfaces (OLS) and Emergency Landing Zones.

The operation and safeguarding procedures for pilots using Rochester Airport are matters that would be continue to be covered under CAA requirements, as they are at the present time. See paragraph 5.13 of the main report.

Cost

The cost of the proposed works to the airport is disputed and it is considered that the overall cost would be considerably higher than that referred to in the application documents. The cost of the proposals is not a matter that can be taken into account in the determination of this planning application in absence of any evidence that the cost would prevent delivery of the proposal.

Malicious emails

A neighbour is of the opinion that there may be some malicious behaviour taking place to distort public opinion and comments on the application. It is implied that the views of those who may use the airport but who may not live locally have been encouraged. It is argued that such action would give the impression that there may be a higher level of support and that this may be an attempt to deceive others to wrongly misrepresent themselves.

Background investigations are taking place but it is not, as a matter of principle, inappropriate for correspondents remote from an application site to make comment on an application. In any event it is not the weight of numbers of comments that is relevant but the weight of argument on material planning matters that must be taken into account. This will be dealt with in the further report if necessary.

Land Compensation Act

It has been suggested by at least one local correspondent that the provisions of the Land Compensation Act 1973 may have some bearing as a material consideration in the Councils' planning decisions. This legislation contains provisions relating to the payment of compensation by the operator of relevant infrastructure if the use of that infrastructure has a negative impact upon surrounding land values. Legal advice has been taken and it is thought unlikely that this would be a material planning consideration. Even if it were material, the weight to be attributed to such considerations would be low.

Noise

The technical matters raised with the Agent thus far are set out on the attached letter/note. Once a detailed response is received it will be assessed by the TMBC consultant and if necessary further matters may need to be raised. The matters surrounding noise factor will have a significant bearing as to the timing of the report back on TM/14/03341/FL

One factor that TMBC will need further information upon is the clarification of the full range of Aircraft types, both fixed wing and rotary wing, that are physically able to utilise a runway of the type/size and configuration proposed.

A further matter relates to the likely effect of noise/disturbance of testing "dead engine" skills as the proposed scheme would only allow this to take place south of the airport (in terms of impact on TMBC) whereas at present does not need to occur on the same flight-path.

Representations

A number of representations have been received raising issues along the lines mentioned above. These and any other representations received subsequently will be dealt with in the substantive report in due course.

REVISED RECOMMENDATIONS**TM/14/03341/FL****APPLICATION WITHDRAWN FROM AGENDA****TM/14/03594/CNA**

In light of the issues identified above, the following recommendation is put forward in respect of this Authority's formal consultation response to Medway Council:

REVISED RECOMMENDATION:

The Borough Council requests that prior to any formal determination of TM/14/03594/CNA (Medway ref: MC/14/2914) Medway Council should consider the matters raised in the Supplementary Report above.

The Borough Council reserves the right to provide further formal comments to Medway Council on the receipt of the above information, or information from any other sources, that may arise in the interim period up to the next report on TM/14/03341/FL.

Alleged Unauthorised Development

**East Malling 14/00289/WORKM
East Malling**

Invicta Works Mill Street East Malling Kent

DPHEH: Members are advised that further investigations concerning a breach of condition (erection of boundary fences and walls) are ongoing in respect of this site. We are not currently in a position to report in detail on these matters but Members will be updated on further progress separately.

To clarify, if Members are minded to endorse the recommendations set out in the main report, enforcement notices would be served as follows:

(1) Enforcement Notices to be served on each of the Leaseholders of the converted Invicta Works building and the Freeholder (which we have established is Clarendon Homes). The Notices would need to be accompanied by a detailed Schedule of necessary remedial works and this will be agreed with the Conservation Architect to ensure its acceptability.

(2) Individual Enforcement Notices to be served on each of the Freeholders of the properties known as Nos. 6 – 11 Darcy Court (inclusive). On the approved plans, these were shown to be plot numbers 1 – 6. Again, it is likely that Officers will need to conduct individual surveys of each of the plots to ascertain in each case what the Enforcement Notice should include.

Members should also be aware that the post and rail fences themselves may not be subject to enforcement action alone as the erection of fences, even outside of residential gardens, benefit from certain permitted development rights. It is the use of the land as residential curtilage and any associated structures that the Notices would be seeking to be rectify.

RECOMMENDATION REMAINS UNCHANGED

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INITIAL TMBC NOTES RE: NOISE – 14 NOVEMBER 2014

In order to evaluate the potential impacts of flying noise on residents of Tonbridge and Malling the Council has instructed consultants to review the noise documentation submitted with the applications. Set out below are a summation of the initial thoughts of the Council's consultant and it will be noted that a number of matters have emerged that require further clarification.

Our consultant expresses the view that is unclear how Environ have obtained the contours in their report.

He has generated some noise contours, by assuming a 5 degree approach glide slope, but these do not mirror the shape of contours in the Environ report. It is also not entirely clear whether the new helipad position has been taken into account in generating the contours. It is assumed that the helicopter movements, post development, will approach and depart along routes parallel with the new surfaced runway. They may not all do that but what helicopter routes have been assumed? (For instance given the aspirations for substantial development on the north west sector of the airport in due course, is it to be assumed that helicopter flights will not take-off in that direction?)

With regard to the noise assessment, there are firstly a number of policy and methodology matters in the assessment upon which we would wish for further clarification.

POLICY

Para 3.4 does not fully reflect what is said in the Aviation Policy Framework (APF), which fully replaced the "Future of Air Transport" white paper, and mention of the latter is not relevant.

The APF says at paragraph 17 (and again at 3.12) that "*Our overall objective on noise is to limit and where possible reduce the number of people in the UK significantly affected by aircraft noise.*"

At 3.17 it says "*We will continue to treat the 57dB LAeq 16 hour contour as the average level of daytime aircraft noise marking the approximate onset of significant community annoyance. However, this does not mean that all people within this contour will experience significant adverse effects from aircraft noise. Nor does it*

mean that no-one outside of this contour will consider themselves annoyed by aircraft noise."

and at 3.19 "Average noise exposure contours are a well established measure of annoyance and are important to show historic trends in total noise around airports. However, the Government recognises that people do not experience noise in an averaged manner and that the value of the LAeq indicator does not necessarily reflect all aspects of the perception of aircraft noise. For this reason we recommend that average noise contours should not be the only measure used when airports seek to explain how locations under flight paths are affected by aircraft noise. Instead the Government encourages airport operators to use alternative measures which better reflect how aircraft noise is experienced in different localities, [Footnote 96]"

Footnote 96 says "Examples include frequency and pattern of movements and highest noise levels which can be expected."

At 3.45 the APF says "Noise from helicopters is perceived as a problem in certain areas, such as routes used intensively by helicopters."

The APF makes frequent reference to the work of the Airports Commission, whose approach to noise was originally set out in their interim report, and is summarized in the three reports issued today, namely

"In this document, we present noise impacts in the following ways:

- day noise (LAeq16h 0700-2300) and night noise (LAeq8h 2300-0700), looking particularly at the 57 decibel level (which in the Government's Aviation Policy Framework marks the approximate onset of significant community annoyance), and the lower 54 decibel level;*
- the European 24 hour Lden measure, which puts more weight on noise that occurs in the evening (1900-2300) or the night (2300-0700) than the daytime (0700-1900);*
- N contours, which capture how many times in a day or night a population will be exposed to a very noisy aircraft flyover (with a 70 decibel threshold for the day, and a 60 decibel threshold for the night)."*

The last bullet point is important, because in the Inspector's report and Secretary of State's Decision on the Farnborough appeal dated 20 February 2011 the Inspector said at 485 *"For my part I am clear that, based on the analysis above, the proposed increase in movements would lead to more frequent instances of speech interruption*

(compared to both today's position and to that of the fallback) and would result in greater annoyance to an appreciable number of residents. Irrespective of whether or not a 2.2db(A) increase is said to be discernible, residents would be very much aware of the noise events consequent on the increased numbers of movements (on average an additional 71 BATMs per weekday)."

The Secretary of State agreed with the Inspector's conclusion that *"while the evidence presented on the basis of the conventional means of assessment, supplemented by subjective assessment, indicates that the noise effects of the proposal would be moderate, the effects would nevertheless amount to demonstrable harm"*

More generally, all noise planning matters are now subject to the Noise Policy Statement for England (NPSE), and the weight to be attached to the three aims of the NPSE was highlighted by the recent Secretary of State's decision on the Thames Tideway Tunnel.

In short, the three aims are:

"Through the effective management and control of environmental, neighbour and neighbourhood noise within the context of Government policy on sustainable development:

- 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."*

The Aviation Policy Framework refers to the NPSE in 3.12 and 3.13

"3.12 The Government's overall policy on aviation noise is to limit and, where possible, reduce the number of people in the UK significantly affected by aircraft noise, as part of a policy of sharing benefits of noise reduction with industry.

3.13 This is consistent with the Government's Noise Policy, as set out in the Noise Policy Statement for England (NPSE)⁹³ which aims to avoid significant adverse impacts on health and quality of life."

The NPSE has an explanatory note which introduces the concepts of Significant Observed Adverse Effect Level (SOAEL) and Lowest Observed Adverse Effect Level (LOAEL).

The noise assessment should therefore include statements as to what noise impacts are SOAEL and what are LOAEL, how SOAEL will be avoided and what means will be used to mitigate and minimise LOAELs.

Planning Policy on Noise, PPG24 was withdrawn by the NPPF and should no longer

be used as a reference point.

The web-based Planning Practice Guidance issued on 6 March 2014 <http://planningguidance.planningportal.gov.uk/blog/guidance/noise/> fleshes out the NPSE and adds further guidance on the way SOAELs and LOAELs should be assessed.

THE INTERPRETATION AND APPLICATION OF POLICY IN THE ENVIRON REPORT

Section 3 "Policy Context" begins by referring to the statutory position regarding noise mapping, and the use of Lden and Lday in the preparation of strategic noise maps. Lden and Lday while relevant to strategic noise maps, do not play a major role in current policy regarding the *assessment* of noise in development proposals.

This is followed, at paragraph 3.3, by a paragraph on the ATWP *which no longer has any weight, as it has been replaced by the Aviation Policy Framework*.

Under the heading of "Aviation Policy Framework" an inaccurate statement is made that the government's overall policy aim is "achieved by conducting noise contours down to a level of 57 dB LAeq 16h", with a following reference to the *now withdrawn PPG 24*.

The Planning Statement at 9.3.12 says that the Air Transport White Paper (ATWP) and Aviation Policy Framework (APF) consider 63 dB LAeq 16h to be the upper threshold of low community annoyance. The meaning of this is obscure, as there cannot be more than one threshold, and on the applicant's approach (as set out at Table 3 of the Noise Report) this is the threshold of "moderate" community annoyance. The APF actually treats 63 dB LAeq 16h as a noise insulation threshold, which suggests (based on the Decision of the Secretaries of State in the Thames Tideway Tunnel DCO process) that 63 dB LAeq 16h is the Significant Observed Adverse Effect Level. They also use the term "*significant*" in APF 3.17 as quoted above.

There is no discussion of SOAELs and LOAELs in the report. There is a suggestion that many local authorities are still using PPG24's NEC system (which in any event did not apply to the assessment of airport developments). While historical reference to PPG24 may play a part in deciding what are SOAELs and LOALs, they would have to be directly addressed in any planning appeal. Case-law indicates clearly that it is not appropriate to use now withdrawn PPG (or PPS) based standards where these are not carried forward into NPPF/PPG.

THE NOISE EFFECTS OF THE PROPOSAL

The noise effects have been assessed in terms of airborne aircraft noise and ground noise. The contours of airborne aircraft noise do not appear to be correct, and therefore the numerical assessment cannot be relied on until this issue is resolved.

Airborne Aircraft Noise

The effects will result from:

- 1) the concentration of all fixed wing flights on runway 02/20 and the closure of runway 16/34
- 2) the relocation of the helipad
- 3) any change in numbers of movements
- 4) any change in time of day for aircraft movements

According to paragraph 2.7 of the planning statement, approximately 30% of aircraft currently use runway 16/34, which means a 43% increase in the number of overflights for residents below the flight paths for runway 02/20.

This is potentially significant for two reasons. Firstly the additional movements cause a 1.5 dB increase in the noise contours for the relevant areas, but more importantly, there is a loss of respite from aircraft noise, which currently occurs for 30% of the time.

This only applies to fixed wing movements, and an important feature of Rochester Airport is the substantial number of helicopter movements from the helipads whose locations will be re-sited by the proposals. Only one helipad appears on the site plan, at the southern edge of the airfield, and this will cause some alteration of helicopter routes close to the airfield. There is insufficient information provided to be able to quantify this.

It must be assumed for the purposes of a robust assessment that at some stage the proposed 40,000 movement limit will be used, and compared with 2013 movement numbers that is a 70% increase. An increase of that magnitude is possible under the existing regime, and it is not clearly identified as to whether the provision of a paved runway will itself bring about an increase in the use of the airfield. A 70% increase in air movements gives an increase of 2.3 dB in LAeq contours, all other things remaining unchanged.

Clearly to the extent that the proposed time limits will prevent movements which currently take place outside those times, there will be a corresponding absence of

noise outside the operational limits.

Ground Noise

The report finds that there will be no change in ground noise levels as a result of the proposals, and there is no obvious reason to challenge that finding.

Circuit Flying

Burham is about 2.4km from the threshold of runway 02 but aircraft flying circuits would turn on to the crosswind leg at approximately this distance and although the village is beyond the end of the noise contours (even if these are extended down to lower values than 57 dB LAeq 16h) a 30% increase in numbers will not go unnoticed (See Farnborough appeal cited above.).

What is the likelihood of larger and/or noisier aircraft being able to land/take off as a result of the proposed change to the runway surface? It would appear that runway dimensions (principally length) rather than runway surface determines the size of aircraft that can operate can the applicant commit to a specific set of aircraft types that will habitually use the runway

Approach Path

It is understood that there is a requirement that aircraft not using the PAPI on runway 02/20 approach on a 5 degree slope, which is higher than the 3 degrees used at large airports. Does this effectively mean that whereas aircraft using runway 16/34 have to use a steep approach, which by virtue of the resulting greater height therefore appear quieter from the ground, all aircraft on 02/20 using the PAPI will not have to make a steep approach? Can it be confirmed what approach profile has been assumed in the noise contours.

It appears, but can it be confirmed, that the increase in the overall noise impact of the airport, will be greater than it seems if the 30% of aircraft currently using 16/34 will use a lower approach glideslope when using 02/20.

More significantly both authorities will be powerless to control the airports operational activity, air movements on the concrete runway could easily accommodate over 100.000 per annum, if this level was required to sustain profitability and from financial evidence obtained showing the current assets of the airport operators amount to £19,000 and profit generated during one of their recent busiest years was £860.00, there is no economical evidence 40,000 estimated air traffic movements per annum will produce sufficient operational running costs. Particularly after commercial business rates are reassessed on completion of any airport reconfiguration. It is worth noting they are now still on transitional rates.

Based on similar scenarios (Redhill Aerodrome) it was considered 80.000 air movements a year would be a more realistic figure. No noise or other assessments have been commissioned to determine how this ridiculous volume of air traffic movements if reached would impact local people and the entire area.

The Town and Country Planning act section 3 recommends assessment of potential significant effects, noise scenarios for 40,000, 50,000, 60000, 70,000 or 80,000 air movements per annum, worst case scenario should be realised.

The Rochester Airport Masterplan document cites 400-500 air movements on a typical busy day over an operational 8 hour period, 250 flights could take off towards the northern residential area which is designated in the CAA AIP as noise sensitive. This would indicate the volume of aircraft passing overhead equates to an average rate of an aircraft taking off or landing every, $(8 \times 60) / 250 = 1.92$ minutes of aircraft movement throughout the day, an unprecedented intolerable nuisance/burden for all the community. The applicants' noise report does not model such levels of intense activity.

The concrete runway modelling shows no significant benefit in noise reduction which is contrary to Medway council publicity on reduced noise benefit in support of a paved runway. In fact the ground noise is 5dB higher.

Whilst the building plans appear sufficiently detailed, the site plans showing the runway position is worthless and not CAA compliant.

If the proposal is to pave 02L/20R on the current alignment and position the standard Runway End Safety Area (RESA) will extend beyond the airport boundary possible onto the M2 Motorway, the Highways Agency may query this?

The (RESA) has to be a clear unobstructed area. The taxi way is not permitted to encroach into it. Why does the site design show the taxi way in the RESA?

Rochester Airport have stated that the replacement runway will be no longer than the existing grass one but there are no tables in the document showing thresholds or specific distances for comparison. The site plan runway and taxi way is not a true representation of the end product.

Any changes to the freshhold points, direction or variation to standard design rules for a concrete replacement runway are subject to more stringent CAA approval, where are these CAA approval documents?

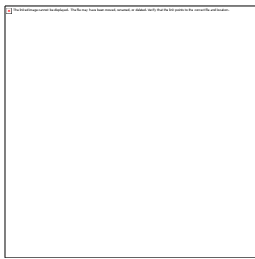
There are no CAA approval documents with this application to ensure the safety of pilots and surrounds, why?

There is no Object Limitation Surface study to show potential dangers for pilots?

Please note that the Medway council Tender document shows 02R/20L TORA; TODA; ASDA; LDA at 690 meters not 684 shown in the table. When did the CAA and Medway council approve the extension of 02R/20L or did Rochester Airport Limited arbitrary make the decision to increase its length? Similarly to the way they arbitrarily decided to reinstate and approve circuit flying at weekends and Bank Holiday times, without consultation with residents.

Clarify the current status and relevance of the TPS Rochester Airport Option Study.

The proposed tarmac runway would run N-S with planes being able to take off in either direction. What percentage of planes took off in each direction as those taking off to the south would have a greater impact and if the majority were taking off in a northerly direction then this would have a reduced impact upon T & M borough?



Development Control

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Your ref
Our ref PTL5/TM/14/03341/FL
Date 14 November 2014

Dear Ms Bloomfield

Rochester Airport, Maidstone Road, Chatham

I refer to the planning application under consideration in respect of the above site.

Having considered the application in detail I should advise that there is some uncertainty in respect of the information so far provided in association with the proposals, particularly regarding the outline element of the hybrid application. On close inspection of the various plans and associated documents, it is our understanding that the land to which the outline part of the hybrid submission relates is that immediately adjacent to the proposed hangers in the south-east corner of the site. I am seeking to clarify this beyond doubt as there is sporadic reference to longer term aspirations to develop the north-west part of the application site and its inclusion within the red line on the submitted site location plan has brought into question whether it is in fact the future development of this part of the site for which you are seeking an outline planning permission. We believe that this is not the case but I would be grateful if you could clarify precisely which part of the site relates to the outline portion of your hybrid submission. If we are correct in the assumption that it is the land southeast of the hangers, I would suggest that you submit a clear plan which demonstrates the position and removes the north-west portion of the site from the red line plan to avoid any future confusion in this matter.

With regard to the works that are the subject of the part of the application for full planning permission (concerning the operational airport), we have sought the advice of a specialist Noise Consultant in association with the changes to the runway set up and any resulting changes in aircraft noise patterns. From initial feedback it has been noted by the Noise Consultant that the noise contours in the submitted Environ noise report appear to be incorrect. Please find attached a detailed, but initial, note to which a response should be made before we are able to reach a view on the application.. Further aspects of noise assessment may emerge in which case I will contact you as soon as possible.



There are a few other factors that we would like comment upon. These third party points are raised in another note attached to the email.

I look forward to hearing from you regarding the above at your earliest convenience.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Hilary Johnson', written in a cursive style.

PP

Hilary Johnson
Senior Planning Officer