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Application Ref No: M/TH/26/0351 / KCC/TH/0050/2026



Date: 8 May 2026

Mr Adam Tomaszewski
Growth, Environment & Transport
Kent County Council
County Hall
Maidstone
Kent
ME14 1XX

Dear Mr Tomaszewski

PROPOSAL: Full planning application for the development of a waste to hydrogen facility with associated ancillary infrastructure, a non-residential innovation and educational facility including offices, new junction onto Manston Road, access and internal roads, boundary treatments, landscaping and other associated works.

LOCATION: Land at Manston Road, Margate, Kent, CT9 4JW

I am writing with reference to the consultation sent to us, informing us of the application for the development of a waste to hydrogen facility with associated ancillary infrastructure, a non-residential innovation and educational facility including offices, new junction onto Manston Road, access and internal roads, boundary treatments, landscaping and other associated works at Manston Road Margate.

Principle of development

The revised versions of the 'Overarching National Policy Statement for energy (EN-1) came into force in January 2026 and commits to meeting clean power by 2030 and net zero by 2050. This policy statement identifies that there is an urgent need for all types of low carbon hydrogen related infrastructure.

The July 2025 Hydrogen Update to the market reconfirmed the government's view that Hydrogen has a fundamental role to growing the economy and as a central pillar to the UK's clean energy future.

The PPG at Paragraph: 001 Reference ID: 5-001-20140306 recognises that planning has an important role in the delivery of new renewable and low carbon energy infrastructure in locations where the local environmental impact is acceptable.

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The site is located within the open countryside as defined by policy SP24 of the Thanet Local Plan. This policy identifies five types of development that would be supported in this location. This proposal is not considered to fit within one of the five types of development identified within policy SP24, and, therefore, would not be supported by policy SP24 of the Thanet Local Plan.

The National Planning Policy Framework (NPPF) states that planning policies should support economic growth in rural areas in order to create jobs and prosperity by supporting sustainable growth and expansion of all types of business and enterprise in rural areas, through well designed new buildings. For this reason Policy E13 of the Thanet Local Plan states that 'well-designed new development for economic development purposes for new businesses will be permitted in sustainable locations, at a scale and form compatible with their rural location'

The Council has approved development on land adjacent to the site under applications F/TH/20/0590 and F/TH/24/1405 for commercial and industrial uses.

The principle of this development is considered to be supported by national policy. Thanet District Council is committed to reducing energy impacts and carbon offsetting, and considers that very significant weight should be given to the alternative energy benefits of this development.

Material Considerations

Policy E16 of the Thanet Local Plan seeks to restrict development on best and most versatile agricultural land in the district. This policy is identified within the applicant's policy list, however is not explicitly discussed within the analysis of the development. The applicant should explicitly address this policy and its three criteria.

A parcel of land would be created between Manston Road to the east, the proposed link road to the north, the innovation and education centre to the west and Charles Anthony House to the south. This land is not included within the red line of the site and would therefore appear to remain in agricultural use. The separation of this area from the remaining agricultural land would give rise to significant concerns about the future viability of this area as agricultural land. Justification should be given to the siting of the link road in the proposed location and consideration should be given to moving this link road closer to Charles Antony House to reduce the extent of land that would be separated from the wider agricultural holding.

The Alternative Sites Assessment (ASA) considers site C2/1 which is located adjacent to Manston Business Park and allocated under policies SP05 and SP06 of the Thanet Local Plan for economic development. The ASA considers that other sites are less favourable than this site due to it being located on grade 1 agricultural land, its proximity to nearby heritage assets, a public right of way running through the site and nearby overhead power lines. The loss of this site as agricultural land was considered through the local plan allocated process and therefore the use of this site would not result in the loss of more agricultural land than is already allocated. The proposed site would however result in the loss of additional agricultural land above that which has already been allocated. Similarly, the visual impacts of a development on this allocated site have been partially considered through the allocation process. This site is significantly larger than the 6.58 hectares identified as required for the proposed development at 20.9 hectares giving space for the development to be sited so that it minimises impacts upon the heritage assets, public right of way and nearby powerlines. Whilst this proposal would not explicitly fall within the B1, B2 and B8 allocations for this site, the industrial nature of this proposal is considered to align with the aims of this policy. Consequently, the Council does not agree that this site is less suitable than the proposed site, and considers that the existing highway connections weigh in the favour of this

allocated site. Therefore the development would appear to be contrary to policy E16 and the loss of this best and most versatile agricultural land would weigh against the development.

The preamble to policy SP24 of the Thanet Local Plan states that *“Thanet’s open countryside is particularly vulnerable to development because of its limited extent, the openness and flatness of the rural landscape and the proximity of the towns. Thanet’s countryside provides important landscapes that contribute to its sense of place, as well as making Thanet an attractive place that people want to come to.”* This site is in an elevated part of the district and the proposed development comprises a large amount of built development, with the tallest structure having a maximum height of 30m above ground level. This development, at the proposed scale, will result in significant visual impacts to the surrounding area, especially to visual receptors on the nearby Public Right of Way network. Notwithstanding this, the Council does acknowledge that a variety of building designs, scale and materials have been used to help break up the development and add some visual interest. The early establishment of landscaping around the site is encouraged to bring forward the mitigation that this would provide. The Council would welcome the opportunity to comment on the discharge of any conditions related to the visual impacts and landscaping of the site should the application be approved.

The Council has significant concerns regarding the loading of additional traffic onto the junction at Manston Road/Spitfire Way (known as “Spitfire Junction”). Policy SP47 of the Thanet Local Plan requires that for development which has a material impact on the capacity of the B2050 Manston Road, the Council will require alternative on-site highway provision where appropriate, and/or proportionate contributions towards any improvements or changes to the existing routes which are thereby necessitated. The requirement for a proportionate contribution applies directly to the proposal, specifically in relation to Spitfire Junction. Whilst improvements to this junction have been committed through other developments, this proposal cannot rely upon those other developments coming forward prior to the proposed use commencing. The Council would defer to the KCC Highways for their technical advice regarding the suitability of the submitted highways assessments and the contribution amount required.

The proposed link road appears to provide a junction at the entrance to the hydrogen production facility rather than a bend in the road that would allow for the continuation of the link road around the outside of the site. Further clarification should be provided regarding the arrangement of this part of the access road as the need for a junction and the provision for the future continuation of this link road is unclear.

The Council has concerns regarding the use of off site provision to address the Biodiversity Net Gain (BNG) requirements for this development. The site is large in size and the existing open agricultural use limits the potential for biodiversity on the site. In accordance with the BNG hierarchy on-site enhancements are preferred. The acquisition of additional land, or the use of BNG credits adds an element of uncertainty and could remove the enhancements from the local area.

Volume 1 Chapter I of the Environmental Statement (Water Environment) states that *“A significant daily volume of water is required for the waste to hydrogen conversion process (plasma-gasification process), with an approximate input of 4.655 tonnes an hour, an output of 1.66 tonnes (through generation of steam), resulting in a 3-tonne loss of water an hour.”* Further information should be provided regarding the water demands for the proposed use, and details of how this would be provided to the site, to establish if sufficient capacity is available without impacting upon other uses in the district.

The provision of jobs within the alternative energy sector within the district, the associated jobs that would be provided both during construction and for the lifetime of the development, and economic benefits of this proposal are supported by the Council and would weigh in favour of the development.

Thanet Council's Senior Environmental Health Officer has provided the following comments on Air Quality, Noise, Land Contamination and Lighting;

Air Quality - Volume 1 Chapter E & Volume 2 (Appendix E)

"An AQA has been reviewed; including construction and operational emissions as well as two standalone assessments for odour and bioaerosols. Ecological effects are included within the assessment but have not been considered here as this is a matter for KCC Ecological Service and others, not TDC Environmental Health.

The assessment reflects relevant legislation, planning policies, and technical guidance, and the methodology uses up to date local monitoring data for baseline conditions. A detailed assessment of quality impacts (NO₂, PM₁₀ & PM_{2.5}) has been undertaken for construction dust, road traffic emissions and point source emissions.

The process will have NO_x emissions from the thermal oxidiser and emergency flare, which has been assessed as having a negligible contribution to local pollution (50-100 mg NO_x per Nm³). Detailed dispersion modelling shows minimal impact.

Air Quality mitigation strategies have been incorporated and includes damage costs, low-NO_x emission plant, 10 EV charge points as well as travel plans, low-emission vehicles, and green infrastructure.

Pollutant concentrations during the operational phase for NO₂, PM₁₀, PM_{2.5}, are not significant and well below AQS objectives as is bioaerosols and odours are negligible and not significant.

The Odour Impact Assessment states: (2.1.2).that the Proposed Development will require an Environmental Permit as the Site involves the treatment of waste and thermal gasification, which are listed activities under Schedule 1 of the Regulations. As such, the Site will be regulated by the Environment Agency and must comply with Best Available Techniques (BAT) for the control of emissions, including odour and noise. The Environmental Permit will provide the primary regulatory basis for controlling process emissions, captured air streams from enclosed waste-handling areas, stack emissions and any odour-forming compounds arising from the operation of the Proposed Development.

Having considered the findings and conclusions, EH are satisfied that the proposed development is unlikely to give rise to unacceptable impacts on residential amenity or the wider environment, subject to the implementation of the mitigation measures identified within construction dust requires mitigation measures as set out in the CEMP in Section E5. 38010-HML-XX-XX-RP-U-060001.

Noise - Volume 1 Chapter F & Volume 2 Appendix F 3 (Construction noise) & F4 (operational noise)

Operational Noise

The site will operate continually over a 24 hour period. Noise from HGVs, tipping and sorting waste and industrial plant (e.g. compressors, pumps, conveyors) operating continuously will generate significant noise. The NIA has shown the baseline levels are very low particularly at night with L90s

around 30dB. The unmitigated BS4142 assessment shows that for several NSRs the impact is likely to be moderate adverse daytime (07:00-23:00) and major adverse at night (23:00-07:00 of around 15dB rating level). Without mitigation this is an unacceptable observable adverse effect and in planning terms should be prevented.

The acoustic consultant has explored potential mitigation measures, including acoustic enclosures, internal lining, an 3m bund and other attenuation, and concludes that residual impacts would reduce to negligible during the day and minor adverse at night (with a rating level difference of up to 4.2dB). However, it is noted that even with mitigation the development will introduce a perceptible and permanent change to the prevailing acoustic environment. Given the scale and continuous (24-hour) nature of the proposed operations, the TDC EH considers it essential that the full extent of the proposed mitigation is robustly secured through appropriately worded planning conditions, including details of design, installation, verification, and ongoing maintenance, to ensure that adverse impacts are minimised and remain within the levels predicted. Without such controls, there is a clear risk of unacceptable adverse effects on residential amenity.

TDC EH acknowledges that the proposed facility would be subject to regulation under the Environmental Permitting (England and Wales) Regulations 2016 as a Part A installation, with noise emissions falling within the scope of control by the Environment Agency through the environmental permitting regime. However, it is important to emphasise that this does not remove the need for the Local Planning Authority to fully consider noise impacts at the planning stage. The planning system is concerned with the acceptability of the proposed development in land use terms, including the suitability of the location and the potential effects on the amenity of nearby receptors, whereas the permitting regime focuses on the detailed control and operation of the process. These are separate but complementary regulatory functions. As such, the Local Authority must be satisfied that the development, as proposed, would not give rise to unacceptable adverse impacts, and that appropriate mitigation can be secured through planning conditions, irrespective of any subsequent controls that may be applied through the environmental permit.

Achieving TDC's recommended design criterion of a rating level at least 5 dB below background requires a reduction of approximately 20dB from the predicted unmitigated rating levels. This represents a substantial level of attenuation which is widely recognised as being technically challenging to achieve in practice, particularly for a development of this scale and complexity involving multiple items of plant operating on a continuous (24-hour) basis. Delivering such reductions would necessitate extensive and highly effective mitigation measures, the performance of which must be carefully designed, implemented, and verified to ensure that the required acoustic standards are reliably met.

Recommended Conditions:

[X] Noise Rating Level Limit

The rating level of noise emitted from the site (including all building services plant, machinery, and operations) shall not exceed a level of 5 dB below the representative background sound level (LA90,T) at any noise-sensitive receptor, as determined in accordance with BS 4142:2014+A1:2019.

[Y} Detailed Acoustic Design Scheme

No development shall commence until a detailed Acoustic Design Scheme has been submitted to and approved in writing by the Local Planning Authority. The scheme shall demonstrate, through calculation and supporting information, how the development will achieve the noise limits specified in Condition [X].

The scheme shall include:

I. full specification of all fixed plant and equipment

II. sound power levels and octave band data

III. details of all proposed mitigation (including enclosures, acoustic lining, barriers, silencers, building fabric, and layout)

IV. predicted noise levels at identified receptors (including cumulative impact)

V. identification of any tonal, impulsive or intermittent characteristics

The approved scheme shall be implemented in full.

[Z] Noise Compliance Verification

Prior to the commencement of operations, a noise validation assessment shall be undertaken to demonstrate that the development complies with the noise limits set out in Condition [X]. The assessment shall be carried out by a suitably qualified acoustic consultant in accordance with BS 4142:2014+A1:2019. A report of the findings shall be submitted to and approved in writing by the Local Planning Authority.

[A] Ongoing Noise Control

All plant and machinery shall be operated and maintained in accordance with the approved Acoustic Design Scheme and shall be retained thereafter. In the event of a substantiated noise complaint, the operator shall, within a period specified by the Local Planning Authority, undertake a further noise assessment in accordance with BS 4142:2014+A1:2019 and submit the findings for review. Where the noise limits are exceeded, a scheme of additional mitigation shall be submitted and implemented to the satisfaction of the Local Planning Authority.

[B] Fixed Plant Limitation

No fixed plant, machinery, or externally mounted equipment shall be installed or operated other than that expressly authorised under the approved Acoustic Design Scheme, unless otherwise agreed in writing by the Local Planning Authority.

Construction Noise

The baseline measurement indicates the most stringent Category A noise limits from BS5228 should apply and must be included within the CEMP along with a proposal for noise monitoring to ensure compliance. The following conditions are recommended:

[X] Construction Working Hours

Construction activities shall be strictly restricted to the following hours unless otherwise agreed in writing by the Local Planning Authority:

I. 08:00 to 18:00 Monday to Friday

II. 08:00 to 13:00 Saturdays

III. No working on Sundays or Public/Bank Holidays

No other construction activities shall take place outside these hours unless otherwise agreed in writing by the Local Planning Authority.

[Y] CEMP

Construction shall be carried out in accordance with the approved Construction Environmental Management Plan submitted pursuant to this permission.

[Z] Construction Noise Management Plan

No development shall commence until an updated CNMP to supplement the Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority.

The plan shall:

- I. be based on the appointed contractor's detailed methodology and plant schedule*
- II. include a construction noise assessment undertaken in accordance with BS 5228*
- III. identify predicted noise levels at the nearest noise-sensitive receptors*
- IV. demonstrate the use of best practicable means to minimise noise including achievement of Category A noise limits*
- V. set out mitigation, monitoring and complaint procedures where threshold levels identified in BS 5228 are likely to be approached or exceeded*

The approved plan shall be implemented in full for the duration of the construction works

Contaminated Land - Chapter K Volume 1 & Volume 2

The Site is located in a groundwater protection area, partly located within a SPZ Zone 3 with SPZ Zone 1 located approximately 1.3 km to the west. Ground Investigation is currently being undertaken to assess the ground conditions at the Site (soil, groundwater and ground gas) and identify if contamination and/or ground gases are present which could pose a significant risk to human health and/or controlled waters. The findings and recommendations of the Ground Investigation should be implemented in full. The following conditions are recommended:

[X] Land Quality - Intrusive Investigation

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

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

(ii) An assessment of the potential risks to:

- Human health;*
- Property (existing or proposed) including buildings, crops, livestock, pets, woodland*
- and service lines and pipes;*
- Adjoining land;*
- Ground waters and surface waters;*
- Ecological systems;*

(iii) An appraisal of remedial options and identification of the preferred option(s).

All work pursuant to this Condition shall be conducted in accordance with the DEFRA and Environment Agency document Land Contamination Risk Management (LCRM).

b) If investigation and risk assessment shows that remediation is necessary, a detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and the natural and historical environment shall be submitted to and approved in writing by the Local Planning Authority prior to commencement of the development. The scheme shall include details of all works to be undertaken, proposed remediation objectives and remediation criteria, a timetable of works, site management procedures and a verification plan. The scheme shall ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation. The approved remediation scheme shall be carried out in accordance with the approved terms including the timetable, unless otherwise agreed in writing by the Local Planning Authority. The Local Planning Authority shall be given two weeks written notification of commencement of the remediation scheme works.

c) Prior to commencement of development, a verification report demonstrating completion of the works set out in the approved remediation scheme and the effectiveness of the remediation shall be 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 details of longer term monitoring of pollutant linkages and maintenance and arrangements for contingency action, as identified in the verification plan, and for the reporting of this to the Local Planning Authority.

[Y] Fuel, Oil and Chemical Storage

Any facilities for the storage of oils, fuels or chemicals shall be provided with secondary containment that is impermeable to both the oil, fuel or chemical and water, for example a bund, details of which shall be submitted to the local planning authority for approval. The minimum volume of the secondary containment should be at least equivalent to the capacity of the tank plus 10%. If there is more than one tank in the secondary containment the capacity of the containment should be at least the capacity of the largest tank plus 10% or 25% of the total tank capacity, whichever is greatest. All fill points, vents, gauges and sight gauge must be located within the secondary containment.

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

[Z] Surface Water and Drainage Strategy

No surface water shall be discharged into any watercourse, surface water sewer, soakaway or Sustainable Drainage System (SuDS) unless it has first passed through an interceptor designed and constructed with capacity appropriate to the site, in accordance with the approved drainage strategy (AKT II, Ref: 6320I HTE Manston Drainage Strategy, dated March2026).

[A] Unsuspected Contamination

If, during development, significant contamination is suspected or found to be present at the site, then this contamination shall be fully assessed and an appropriate remediation scheme agreed with the Local Planning Authority. The approved works shall be implemented within a timetable agreed by the Local Planning Authority and shall be of such a nature as to render harmless the identified contamination given the proposed end use of the site and surrounding environment, including controlled waters.

[B] Unexploded Ordnance (UXO) Mitigation and Verification

No development shall commence (including any intrusive ground investigations, trial pits, boreholes, or foundation works) until a detailed Unexploded Ordnance (UXO) Risk Mitigation Strategy has been submitted to and approved in writing by the Local Planning Authority. The Strategy shall be informed by the preliminary UXO assessment and shall include, as a minimum:

I. provision for all site personnel to receive appropriate UXO awareness training prior to undertaking relevant works;

II. supervision of intrusive ground investigations within identified high-risk areas by a suitably qualified Explosive Ordnance Disposal (EOD) engineer;

III. the undertaking of visual and instrument-based UXO detection surveys at each exploratory location, including trial pits and boreholes;

IV. a protocol for the identification, reporting, and safe management of any suspected UXO encountered during the works.

The development shall thereafter be carried out strictly in accordance with the approved Strategy.

Prior to the commencement of development beyond site investigation works, a verification report shall be submitted to and approved in writing by the Local Planning Authority confirming that the approved mitigation measures have been implemented.

Lighting

External Lighting Scheme

No external lighting shall be installed or brought into use until a detailed external lighting scheme has been submitted to and approved in writing by the Local Planning Authority.

The scheme shall be designed in accordance with the guidance set out in Institute of Lighting Professionals Guidance Note 1 for the Reduction of Obtrusive Light (2021) and shall include:

I. the identification of the environmental zone for the site and surrounding area;

II. the location, height, design, and luminance of all proposed lighting;

III. details of light spillage, glare, and sky glow, including isolux contour plans;

IV. measures to control light intrusion at nearby sensitive receptors;

V. ensure that no lighting gives rise to a hazard to aviation and shall demonstrate how the requirements of the airport operator have been taken into account

VI. details of timers, dimming, and/or motion sensors to minimise lighting when not required.

The scheme shall demonstrate that obtrusive light levels at nearby receptors do not exceed the recommended limits for the relevant environmental zone as set out in the above guidance.

The approved lighting scheme shall be installed and operated in accordance with the approved details and shall be retained thereafter. No additional external lighting shall be installed without the prior written approval of the Local Planning Authority.”

The Council would expect expert statutory consultees and internal departments of Kent County Council to provide full technical consideration of other matters including archaeology, biodiversity, drainage, and highways.

Other Matters

Should the application be approved Thanet District Council would expect conditions securing the following matters in addition to those suggested by the Council's Senior Environmental Health Officer:

- Archaeological assessment of the site
- Submission of soft and hard landscaping details and completion of these works
- Land remediation and verification of completed works
- Provision of suitable drainage facilities
- Samples of external materials
- A requirement for the proposed innovation and education centre to remain associated with the hydrogen production facility
- Provision and permanent retention of any highways improvements, visibility splays, access and parking facilities
- Compliance with a construction environment management plan
- Details of external lighting

As noted above Thanet District Council would welcome the opportunity to comment on any condition details submitted for discharge should the application be approved.

I hope this is of assistance to you. Please do not hesitate to contact me if you need to discuss the content of this letter.

Yours sincerely



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