LOCAL IMPACT REPORT

Manston Airport DCO (PINS Reference TR020002)

Produced by Kent County Council

1. Introduction

1.1 This report has been prepared by Kent County Council (KCC) as a statutory consultee, in accordance with the advice and requirements set out in the Planning Act 2008, the Localism Act 2011 and Advice Note One: Local Impact Reports (Version 2, April 2012, The Planning Inspectorate).

1.2 The Advice Note states that a Local Impact Report (LIR) is a 'report in writing giving details of the likely impact of the proposed development on the authority's area'.

1.3 The Advice Note states that when the Examining Authority decides to accept an application, it will ask the relevant local authorities to prepare a LIR and this should centre around whether the local authority considers the development would have a positive, negative or neutral effect on the area.

1.4 The Report may include any topics that the local authority considers to be relevant to the impact of the development on their area and may be used as a means by which their existing body of knowledge and evidence on local issues can be fully and robustly reported to the Examining Authority.

1.5 The LIR has been written to incorporate some of the subject areas suggested in the Advice Note and the Environmental Statement.

1.6 This report considers the following local impacts to bring to the attention of the Examining Authority:

- Highways and Transportation; *(set out in the attached appendix A);*
- Noise;
- Public Rights of Way;

- Heritage and Conservation; and
- Freshwater environment.

2. Transport Strategy - Aviation

2.1 KCC has substantial experience of the impacts of aviation noise in relation to the arriving aircraft over West Kent destined for Gatwick Airport. Due to the impacts of Gatwick Airport (primarily the negative impact of aviation noise), KCC has a seat on the Gatwick Airport Consultative Committee (GATCOM), the Noise Management Board (NMB) and Noise and Track Monitoring Action Group (NaTMAG, representing GATCOM). During the Airports Commission review into runway capacity in the South East, and particularly in relation to the proposals for a new Thames Estuary Airport and Gatwick Second Runway, KCC provided representation on the local impacts of expansion plans. Consequently, although KCC has no statutory responsibility for aviation noise, a great deal of knowledge and experience has been amassed.

2.2 Aviation noise is not experienced in identical ways by individuals living under affected areas. There are a range on non-acoustic factors that influence annoyance, including self-reported sensitivity, age, gender, a feeling of being in control and living conditions. For example, a study by the University of Sussex[1] on the areas overflown to the east of Gatwick Airport found that the impact of aircraft on their life outdoors (i.e. in their garden or community green space) determined the feeling of being "bothered, disturbed or annoyed" for approximately 1 in 10. Conversely, the same study found that 40% of participants interviewed in person and 25% of participants surveyed by post were not disturbed at all by aircraft noise during the day. There is clearly a wide divergence in impact at the same noise level and frequency of overflight.

2.3 In Thanet and the adjacent district of Canterbury, there will have been a turnover of population since the airport ceased operations. The communities that would be affected by a reopened airport cannot be assumed to be used to aviation noise. Furthermore, the perception of how noise might change affects the level of disturbance by noise. The Survey of Noise Attitudes[2] (2017) has shown that a community expecting an airport to

[1] [redacted]

[2] [redacted]

be noisier next year will be 30 – 50% more highly annoyed than one expecting an airport to be quieter next year.

2.4 This research shows that there is a clear need for the applicant to manage the expectations of communities in relation to noise and also how it might change over years of operation. There is also a need to give communities a sense of control over that noise impact, which includes access to insulation and relocation schemes, and also involvement through representation on the Consultative Committee (not just through Local Authority representation, but by a dedicated member representing environmental and noise interests).

2.5 Night noise is by far the least acceptable form of aviation noise. The applicant has included a voluntary night noise quota in their proposed Noise Mitigation Plan (NMP). Whilst KCC welcomes that further clarity and a reduction in quota value have been given since the earlier consultation draft of this NMP, it is still considered that some improvements could be made to reassure communities.

2.6 The voluntary noise quota requires a commitment on how long it will be in place, as currently there is no reference to whether it is a permanent commitment or subject to review after a defined period. If it is the intention to review the quota scheme, then there should be a defined mechanism by which to do so. For example, this could be through a Noise Action Plan produced in consultation with the Consultative Committee and the public. Such an Action Plan would set targets for measures that could reduce noise impact, which might also include operational measures for how aircraft approach and depart (for example, a runway direction preference in low wind conditions). This would give communities in the area, or those considering living there, an assurance over how much night noise can be expected and therefore could reduce potential disturbance.

2.7 Whilst the voluntary noise quota gives a commitment on the level of noise over a year, there is no corresponding movement limit. For example, the quota could be met by any of 6,056 QC/0.5 aircraft, 3,028 QC/1 aircraft (twice as noisy) or 757 QC/4 aircraft (eight times as noisy as QC/0.5) over the year. Residents could be concerned about how many movements they should expect. Although the assessment shows no significant impact by number of awakenings in the night, the research at Gatwick has shown that some people are significantly more sensitive to aircraft noise than others.

2.8 There is also no seasonal split in the noise quota so theoretically, it could be fully utilised in a winter season (where demand is expected to be higher). So, although it is accepted by KCC that the average busiest night in the winter would be seven air transport movements, there is no mechanism in the NMP to fully assure this.

2.9 The proposed insulation scheme has the eligibility criterion of habitable rooms in the 63dB $L_{Aeq\ 16hr}$ contour or bedrooms within the 55dB $L_{Aeq\ 8hr}$ contour. This provides access to £4,000 towards acoustic insulation. The definition of the boundary of the scheme is by the Significant Observable Adverse Effect Level (SOAEL). The relocation scheme is defined by the Unacceptable Adverse Effect Level (UAEL), the 69dB $L_{Aeq\ 16hr}$ contour. These meet the requirements of the Aviation Policy Framework.

2.10 However, the County Council would encourage the applicant to go beyond minimum standards, given the increase in sensitivity to aviation noise. The EU Position Paper (2002) and EAA Position Paper (2011) found that 15% more people are highly annoyed at 50dBA just within nine years. Based on projections by the applicant, in year 20, only 115 properties are within the SOAEL contour, so it might be possible to extend the relocation scheme to that area on a discretionary basis, perhaps if they have experienced a 3dB increase in noise (as per Gatwick's scheme) as use of the Airport increases. Gatwick's insulation scheme is also based on the lower 60dB $L_{Aeq\ 16hr}$ contour. Furthermore, it is impossible to insulate an outdoor space and in the summertime with windows open, the effect of acoustic insulation is reduced. For these reasons, the residents in the 63dB $L_{Aeq\ 16hr}$ contour may still experience significant adverse effects even when insulation is fitted, noting the data at Gatwick where 10% of people have their perception of noise disturbance greatly influenced by the experience outside of the home.

2.11 The relocation scheme applies to home owners only. Consideration should be given to including provision for those in rented accommodation who have been living in the UAEL and SOAEL since the time that the DCO might be granted. The cost of moving for those in rental accommodation would be much lower but could nevertheless be prohibitive, especially in an historically economically disadvantaged area such as Thanet. It would be an equitable gesture to extend support to those affected for a specified time period and at an appropriate financial level.

2.12 The Environmental Statement has taken a robust assessment of the likely impacts of operational aviation noise, taking a conservative figure for the Lowest Observed Adverse Effect Level (LOAEL) and conforming to Government policy and guidance from the World Health Organisation and others. This has demonstrated that a number of residential dwellings will be exposed to significant adverse effects, defined as a perceptible change in quality of life.

2.13 On a typical busy day in year 20, the applicant is forecasting the airport to handle 79 air transport movements. By year 20, during the night 16,465 dwellings are in the LOAEL and 225 above the SOAEL. Further, 160 dwellings will be exposed to 5 – 9 events in excess of 60dB during the night. This is likely to result in annoyance, and for those significantly adversely affected, it may result in health impacts ranging from sleep disturbance and stress to cardiovascular conditions. It is therefore vital that an appropriate level of mitigation is offered in terms of insulation and relocation assistance, as well as community involvement in airspace design - including potential for respite, restrictions in night flights and runway preferencing in low wind conditions. Communities affected must know what to expect from a reopened airport in terms of noise impacts, because unexpected noise impacts are more noticeable and cause greater disturbance.

2.14 The County Council requests that the proposed airport scheme should be compliant with World Health Organisation guidelines on Aviation and Noise; the link to the guidelines is below:

[redacted]

3. Public Rights of Way (PROW)

3.1 The County Council would expect monies to be secured to improve the surface of the existing and diverted bridleways to a minimum width of 3m along the entire length, which will include bridleways TR8 and TR10. KCC can supply a cost for this work.

Bridleway TR8

3.2 It is understood from the PRoW Management Strategy that bridleway TR8 will be rerouted along the edge of the new proposed perimeter fence of the airport, with the

previous route permanently closed and a new route permanently established. It is requested that contact is made with the KCC PRoW and Access Service at the applicant's earliest convenience, to discuss any required route diversions. In respect of ongoing maintenance, it will be expected that the site operators will take on ongoing maintenance responsibilities for any landscaping and enhancements along the bridleway and PRoW network.

3.3 Hedge or vegetation planting required as screening will need to be at least 2m away from the boundary of the bridleway to ensure that the full width of the bridleway is open and available once the hedge matures, and to facilitate future hedge maintenance, without requiring the closure of the bridleway.

Bridleway TR9

3.4 It is accepted that the part of the bridleway that lies within the site boundary will have to be extinguished and that it is not currently used, as it is a dead-end route.

3.5 The applicant's PRoW Management Strategy states that a new link from bridleway TR9 to the proposed Thanet Parkway Station across the site or around the edge of the site cannot be provided as part of this development proposal. However, the County Council requests that the additional connection to Thanet Parkway is still considered by the applicant, as this will greatly benefit the connectivity of the site and will further increase opportunities available to the local community for recreation, active travel and exercise.

4. KCC Heritage Conservation

4.1 Comments have previously been provided with respect to the drafting of the Preliminary Environmental Impact Report (PEIR) (June 2017), the submitted PEIR (January 2018) and Relevant Representations (October 2018).

4.2 Wider effects of development on the setting of designated heritage assets outside the site are the remit of the local authorities' conservation specialists and Historic England.

Archaeology

4.3 Thanet is generally very rich in archaeology; its location as a 'gateway' to the country since prehistoric times has left a legacy of extensive buried archaeological landscapes, with remains regularly found that are unique in character and of regional and national importance. This rich archaeological landscape extends into the former airfield, as can be seen recorded in the Kent Historic Environment Record and in the published results of archaeological work on sites adjacent to and within the airfield. Evidence for prehistoric funerary monuments, enclosures, fields, trackways, settlement and burial ranging from prehistoric through to medieval times has been recorded. In addition, the archaeology and built heritage of the airfield contains significant evidence of its use as a military and civil airfield since the First World War.

4.4 The application included a desk-based study (Appendix 9.1) that supported the PEIR and the baseline used in the Environmental Statement. The County Council provided comments on the PEIR in February 2018. KCC found that the baseline study was well written and provided a comprehensive account of the archaeological background but was limited to published sources and a brief site visit. The authors at that time did not have access to the results of survey and trail trenching works carried out by Stone Hill Park and had not gained access to the site for specific works to evaluate the impact of the DCO proposal.

4.5 The County Council welcomes that the results of the geophysical survey and the evaluation trenching undertaken by Stonehill Park on the main part of the airport have become available to the applicant for consideration in the DCO application. The reports of the survey and trenching now provides a useful source of information to the archaeological potential for those parts of the airport area south of Manston Road that have been investigated. Paragraph 9.3.8 of the Environmental Statement states that the evaluation results have been used to inform the Environmental Statement, however it is difficult to see, other than within the short reference included in table 9.8, where this is included within the overall baseline that has been provided. Given the detailed information now available to the applicant, the County Council would expect greater use of the outputs to inform the discussion of the baseline and set out more precisely the archaeology known within the airfield and how it will be affected.

4.6 It is important to note that the now published Stone Hill Park survey and evaluation were specifically tailored to assess the impacts of the initial development proposal and did not

cover a number of areas of potential impact arising from the present DCO proposal. In particular:

- The area of development proposed north of Manston Road known as the North Grass Area was not included in the geophysical survey or subsequent trial trenching;
- The location of the helicopter facility in the south east of the site, and the area proposed for HGV access and earthworks north of the western runway were not tested through trial trenching but had significant geophysical survey results; and
- An extensive arable area proposed initially for a contractor's compound and later an area of car parking has not been surveyed or evaluated.

4.7 The County Council and Historic England have, throughout the period of scheme development, maintained a position that the rich archaeological potential of the site warrants that the planning decision should be informed by the results of appropriate geophysical survey and targeted evaluation trenching. This accords with the policy set out in the National Planning Policy Framework (NPPF (para 189) and Thanet District Council's Local Plan policy HE11 (2006). The purpose of such evaluation is to ensure that, where appropriate given their significance, the preservation in situ of archaeological assets can be fully considered and taken account of in the planning decision.

4.8 It is accepted that the areas mentioned above have not been accessible to the applicant for the field survey and evaluation that the County Council regards as necessary to understand the implications of the development in those areas. Table 9-4 in the Environmental Statement refers to a telephone conference on the 25th May 2018 between the applicant and Simon Mason, the County Council's Principal Archaeological Officer. To clarify the position stated in that discussion:

1) KCC accepts, as stated, that the applicant has not been able to access the site for survey and investigation works;
2) The investigations for Stonehill Park provide an adequate picture for the archaeology on the south side of Manston Road within the parameters of the original Stonehill Park planning application. Areas as outlined above have not been sufficiently evaluated to provide an equivalent picture;
3) The wording in the Environmental Statement does not fully convey the position agreed. There is a need to survey and evaluate the North Grass Area prior to development. In the North Grass Area and areas of the airport which have yet to be evaluated, there remains the potential presence of archaeology of a

significance that could require preservation in situ as the desirable outcome. The County Council would accept that this can be achieved post determination, as long as there is sufficient - and perhaps substantial - flexibility in the development design to enable preservation to be achieved. The applicant explained in the teleconference that this can be achieved in the North Grass Area through reduction of the area of business development if required, as that would not compromise the overall position of airport development.

4) Given the above, a DCO requirement should cover the need to preserve the archaeology, including through adjustment of development parameters as well as covering the necessary stages of evaluation and investigation. The requirements should also cover extensive investigation of those areas of the airport where archaeology will be affected by development but is not to be preserved in situ. The County Council welcomes the intention to agree a Written Scheme of Investigation with KCC for future archaeological investigations.

4.9 Table 9.9 in the Environmental Statement, which covers environmental measures incorporated into the construction phase, includes an incorporated measure of '*flexibility inherent in the masterplanning process following any further investigations and survey*'. Paragraph 9.8.15 discusses the approach to flexibility to enable preservation in situ. It does not explain how a substantial area or feature of high significance would be accommodated in the development planning if found in the North Grass Area. Archaeology in that area could be shallow buried and would be vulnerable to forms of development that includes car parking and other external works as well as building construction. The present masterplan illustrates a development where much of the North Grass Area is included within hard development construction other than that area fixed as open space around the radar. The applicant should demonstrate how flexibility can be achieved to ensure that it is fully understood in the examination of the DCO.

4.10 Section 9.8 discusses the significance of the archaeological baseline and has drawn on the results of the Stone Hill Park evaluation. The County Council has agreed that there are substantial areas of the Stone Hill Park findings that can be mitigated through investigation and recording, but that there are also areas identified for preservation in situ including a WWII anti-aircraft battery, the remains of a Roman enclosure possibly associated with the Caesar invasions and the barrow cemeteries on Telegraph Hill, which are likely to be more extensive than the two monuments that were evaluated. Most of these features would potentially be preserved in the present masterplan,

although their significance needs to be highlighted so that they are considered as plans evolve.

4.11 The County Council notes that a draft requirement (16) for dealing with archaeological remains has been provided by the applicant. It is not clear in the wording of Requirement 16 how those areas that have not been evaluated and may have potential preservation requirements are to be addressed.

4.12 Clause 16 (1) requires the submission and agreement of a Written Scheme of Investigation for investigation of areas of archaeological interest. The County Council understands that the applicant's consultants are presently drafting a Written Scheme of Investigation for the archaeological works in advance of the development works and looks forward to discussing this in due course. Such a Written Scheme of Investigation will need to be flexible enough to be able to respond to evolving design and impacts of the development.

4.13 The Written Scheme of Investigation should outline a programme of post excavation works including assessment, analysis reporting, publication and archiving. Clause 16 (3) allows for this to be implemented although the timescale for completion of a year may be ambitious. In normal circumstances the County Council would expect a post excavation assessment report to be submitted and agreed within 6 months of completion of fieldwork (possibly by phase of development) and an updated project design and timetable agreed for the remainder of the post excavation analysis, reporting and archiving works. Clause 16 (3) allows for that but could be made clearer.

4.14 Clauses 16 (4) to 16 (6) appear to refer to a process of protecting remains that are found during construction works until a decision can be made on their treatment through investigation. It is not clear how such remains would be identified and by whom. The County Council would expect this aspect to be covered in the Written Scheme of Investigation.

Built Heritage within the application site

4.15 Chapter 9.9 of the Environmental Statement refers to Built Heritage assets within the site. KCC recognises the limitations that access to the site has caused in terms of surveying the heritage assets. However, it is difficult to understand from the DCO

submission which built heritage assets will be affected by the present plans and what may be retained. Reference is made to Table 4.2 in Appendix 9.1 listing the features in the airfield and to the construction description in Chapter 3 of the Environmental Statement. Chapter 3 does not detail what may be demolished of these assets. The applicant should provide a more detailed account of the built heritage assets of the site, their significance and how they will be treated in the proposed development. Built heritage assets within the airport contribute to the historic sense of place of the airfield and should be retained as far as possible.

4.16 The County Council welcomes the intention to retain the museums and memorial gardens and would support any enhancement opportunities that can be delivered. The connection of these to the built heritage in a holistic way to ensure the historic sense of place of the airfield is recognised is important. In this respect it should be noted that within the present Masterplan the visual relationship of the museum area and the runway will be severed by the proposals with the construction of the cargo hangers and open aspects to the north and east lost through the construction in the North Grass Area.

5. Freshwater environment

5.1 Attention has been paid to the operation of the drainage system, which includes the two attenuation basins for water quality control reasons.

5.2 KCC would highlight that these basins will need to operate to manage surface water in the event of extreme rainfall, and consideration must be given to adequate sizing and operations of the drainage system including the network, basins and associated pump, so that local flood risk is not created. This matter does not appear to be captured and should be considered.

5.3 The draft DCO does not currently include provision for KCC as Lead Local Flood Authority to be part of the review and consultation process in relation to surface water drainage (Surface and Foul Drainage, paragraph 13 of Schedule 2). It is requested that this is amended accordingly.

5.4 It should be noted that KCC is the statutory consultee for surface water drainage under the terms of the Town and Country Planning (Development Management Procedure) Order 2015 and surface water is not within the EA remit.

6. Conclusion

6.1 KCC will continue to engage positively with the applicant and the Examining Authority and will welcome further engagement on the content of this LIR as the examination advances.

planning
transport
design
environment
infrastructure

Application by RiverOak Strategic Partners Ltd for an Order Granting Development Consent for the upgrade and reopening of Manston Airport

Local Impact Report for Kent County Council Highways and Transportation

January 2019 PL/12679

Contents

1 Terms of Reference

1.1 Introduction

1.1.1 This report comprises the Local Import Report (LIR) of Kent County Council Highways and Transportation (KCC H&T) in relation to the application by RiverOak Strategic Partners Ltd for an Order Granting Development Consent (DCO) for the upgrade and reopening of Manston Airport. KCC H&T has considered the purpose of the LIR as set out in Section 60(3) of the Planning Act 2008 (as amended), the Ministry of Housing, Communities and Local Government (MHCLG)'s Guidance for the examination of applications for development consent and the Planning Inspectorate (PINS)'s Advice Note One, Local Impact Reports, in preparing this LIR.

1.2 Purpose of the LIR

1.2.1 The LIR sets out the local knowledge and evidence on local issues that could be affected by the Proposed Development. As suggested in the PINS Advice Note One, the LIR should cover any topics which are relevant to the impact of the proposed development in their area. This document does not seek to replicate any assessments or reports that have been provided and due to be undertaken as part of the application process.

1.2.2 The LIR provides a description of the site, details of the proposal and summarises the relevant national and local planning policies before reviewing the traffic and transportation impacts of the proposed development and the extent to which these have been adequately addressed by the Applicant.

1.2.3 This topic is considered against the policies of both the adopted Thanet Local Plan 2006 and the Draft Local Plan to 2031.

2 Site Description and Policy Framework

2.1 Site Description

2.1.1 The DCO site is located on the land occupied by the former Manston Airport. The Airport site is largely disused apart from the RAF Manston History Museum, Spitfire & Hurricane Museum and a cafeteria.

2.1.1 The site is adjacent to and in close proximity to a number of residential properties in the villages of Woodchurch, Manston and Cliffsend. There are also clusters of properties located adjacent to and in close proximity to the site on Spitfire Way, Manston Road, Manston Court Road, High Street, Canterbury Road West, King Arthur Road and Cliff View Road.

2.1.1 The main access to the site is via the A299, which is the main access route to the south of Thanet including Ramsgate, Broadstairs and Westwood.

2.2 National Planning Policy Framework (NPPF)

2.2.1 The NPPF has recently been updated (July 2018) and sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally-prepared plans for housing and other developments can be produced. The NPPF is a material consideration in planning decisions.

2.2.2 At the heart of the NPPF is a presumption in favour of sustainable development. This is reflected in Section 9 of the document where it is noted that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering genuine choice of transport modes. The NPPF advises that in assessing sites, it should be ensured that:-

(a) "*Appropriate opportunities to promote sustainable transport can be – or have been – taken up, given the type of development and its location;*

(b) Safe and suitable access to the site can be achieved for all users; and

(c) *Any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.*"

2.2.3 Paragraph 109 states that "*development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or if the residual cumulative impacts on the road network would be severe.*" It then goes on to note that applications for development should:-

(a) "*Give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;*

(b) Address the needs of people with disabilities and reduced mobility in relation to all modes of transport;

(c) Create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;

(d) Allow for the efficient delivery of goods, and access by service and emergency vehicles; and

(e) *Be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations*".

2.2.4 All developments that will generate significant amounts of movement should be required to provide a Travel Plan, and the application should be supported by a Transport Statement or Transport Assessment so that the likely impacts of the proposal can be assessed.

2.3 National Planning Practice Guidance (NPPG)

2.3.1 The NPPG was established in March 2014 as a supporting resource in conjunction with the NPPF, which is also a material consideration in determining planning applications. With respect to transport, the NPPG includes a section titled 'Travel Plans, Transport Assessments and Statements in Decision-Taking'. This provides general guidance on the process of producing these documents, from which the following key points are expressed.

2.3.2 With regard to the purpose of a Transport Assessment or Statement it is noted that:-

> *"The Transport Assessment or Transport Statement may propose mitigation measures where these are necessary to avoid unacceptable or "severe" impacts. Travel Plans can play an effective role in taking forward those mitigation measures which relate to on-going occupation and operation of the development".*

2.4 Local Transport Plan 4 (LTP4): Delivering Growth without Gridlock 2016-2031

2.4.1 The Local Transport Plan 4 (LTP4) was prepared by Kent County Council (KCC) and runs from 2016 to 2031. The Plan includes details on how KCC will meet its ambition for Kent, which is:-

> *"To deliver safe and effective transport, ensuring that all Kent's communities and businesses benefit, the environment is enhanced and economic growth is supported".*

2.4.2 This ambition will be realised through five targeted, overarching policies which will aim to deliver specific outcomes for the county:-

> ***"Outcomes 1: Economic growth and minimised congestion***

Policy: *Deliver resilient transport infrastructure and schemes that reduce congestion and improve journey time reliability to enable economic growth and appropriate development, meeting demand from a growing population.*

Outcome 2: Affordable and accessible door-to-door journeys

Policy: *Promote affordable, accessible and connected transport to enable access for all to jobs, education, health and other services.*

Outcome 3: Safer travel

Policy: *Provide a safer road, footway and cycleway network to reduce the likelihood of casualties, and encourage other transport providers to improve safety on their networks.*

Outcome 4: Enhanced environment

Policy: *Deliver schemes to reduce the environmental footprint of transport, and enhance the historic and natural environment.*

Outcome 5: Better health and wellbeing

Policy: *Provide and promote active travel choices for all members of the community to encourage good health and wellbeing, and implement measures to improve local air quality."*

2.4.3 Within LTP4, KCC outlines Strategic, Countywide and Local strategies for achieving the above outcomes, whilst continuing to promote and deliver **'Growth without Gridlock'**.

2.5 Statutory Development Plan

2.5.1 For the purpose of this DCO, the development plan comprises the 'Saved' Policies of the Thanet District Local Plan 2006. The Planning and Compulsory Purchase Act 2004 introduced measures that meant all the policies in the Thanet Local Plan 2006 would expire in June 2009 unless the Secretary of State extended the policies beyond that date. A Direction has been received from the Secretary of State and 93 of the policies in the 2006 Local Plan have been saved.

Thanet Local Plan 2006 'Saved' Policies

Policy EC2 - Kent International Airport – *"Proposals that would support the development, expansion and diversification of Kent International Airport will only be permitted subject to the following requirements:-*

7) any new development which would generate significant surface traffic must meet requirements for surface travel demand in compliance with Policy EC3."

Policy TR3 - Provision of Transport Infrastructure – *"The District and County Councils will ensure, by means of a transport infrastructure that is necessary and relevant to the development to be permitted. Proposals for transport infrastructure will be assessed in terms of their impact on capacity and safety of the transport network together with their social and economic impacts."*

Policy TR12 - Cycling – "*in order to promote increased use of cycling:-*

a) *the council will seek the provision at the earliest opportunity, of a network of cycle routes. planning permission will not be granted for any development, which would prejudice the implementation of proposed cycle routes;*

b) *the council will seek the incorporation of facilities for cyclists into the design of new and improved roads, junction improvements and traffic management proposals;*

c) *substantial development generating travel demand will be required to provide convenient and secure cycle-parking and changing facilities. Proposals to provide such facilities as part of development proposals in town centres and at transport interchanges, schools and places of employment will be permitted; and*

d) *in new residential development facilities for the secure parking and storage of cycles should be provided or, in exceptional circumstances where not provided, the design should facilitate the provision in future."*

Policy TR15 - Green Travel Plans – "*Development proposals likely to generate significant travel demand and/or traffic movement will be required to demonstrate, through green travel plans, specific measures to encourage and facilitate use of walking, cycling and public transport in preference to private car travel. The council will seek to approve measures, which will assist implementation of green travel plans and school travel plans.*"

Policy TR16 - Car Parking Provision –

a) "*proposals for development will be required to make satisfactory provision for the parking of vehicles (including, where appropriate, service vehicles). Proposals seeking car parking provision above the standards set out in Appendix G will not be permitted. in conservation areas where provision of parking in line with this policy would be detrimental to the character of the conservation area or have an adverse effect on the setting of a listed building or ancient monument then exceptions may be made.*"

Draft Local Plan to 2031

2.5.2 Thanet District Council is currently in the process of preparing a new Local Plan. The Draft Local Plan to 2031 was submitted to the Secretary of State for Communities and Local Government on 30th October 2018, for independent examination.

2.5.3 The draft plan will now be subject to an Examination in Public, conducted by independent Inspectors, who have been appointed by the Planning Inspectorate.

2.5.4 Therefore, as the draft Local Plan is at an advanced stage and likely to be adopted before the decision on whether to grant a DCO, the policies in the Draft Local Plan are a material consideration when determining this application for a DCO.

2.5.5 Manston Airport has not been allocated for any proposed development in the Draft Local Plan.

> Policy SP41 - Safe and Sustainable Travel – "*The Council will work with developers, transport service providers, and the local community to manage travel demand, by promoting and facilitating walking, cycling and use of public transport as safe and convenient means of transport. Development applications will be expected to take account of the need to promote safe and sustainable travel. New developments must provide safe and attractive cycling and walking opportunities to reduce the need to travel by car.*"
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> Policy SP42 - Accessible locations – "*Development generating a significant number of trips will be expected to be located where a range of services are or will be conveniently accessible on foot, by cycle or public transport. The Council will seek to approve proposals to cluster or co-locate services at centres accessible to local communities by public transport and on foot."*
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> Policy SP43 - Transport Infrastructure – "*Development proposals will be assessed in terms of the type and level of travel demand likely to be generated. Development will be permitted only at such time as proper provision is made to ensure delivery of relevant transport infrastructure. Where appropriate, development will be expected to contribute to the provision, extension or improvement, of walking and cycling routes and facilities and to highway improvements.*
>
> *Subject to individual assessments, schemes maybe required to provide or contribute to:*
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> 1) *Capacity improvements/connections to the cycle network*
> 2) *Provision of pedestrian links with public transport routes/interchanges*
> 3) *Improvements to passenger waiting facilities*
> 4) *Facilities for display of approach time information at bus stops along identified quality bus corridors*
> 5) *Improvement and expansion of public transport services*
> 6) *Improvements to the road network in line with schemes identified through the Transport Strategy."*
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> *Policy SP47 - Strategic Routes – "The following areas, as shown on the Policies Map, are safeguarded for the provision of key road schemes and junction improvements, to support the implementation of the Thanet Transport Strategy, including land at:*
>
> *2) B2050 Manston Road, Birchington*
>
> *4) Shottendane Road-Manston Road housing site*
>
> *5) Nash Road-Manston Road housing site*
>
> *8) Manston Court Road/Star Lane (from Haine Road, Westwood to B2050 Manston Road)*
>
> *9) B2050 Manston Road (from Manston Court Road to Spitfire Junction)*

10) B2190 Spitfire Way (from Spitfire Junction to Columbus Avenue junction)

11) From Columbus Way to Manston Road, Birchington"

2.5.6 The Council expects all new development to make a proportionate and appropriate contribution to the provision of this key infrastructure.

3 Summary of Proposed Development

3.1 Overview

3.1.1 The proposed development is seeking to reopen Manston Airport, which has been closed since 2014, with the intention to operate it as an air freight hub with associated business aviation and passenger services.

3.1.2 The proposal to reopen Manston Airport is classified as a Nationally Significant Infrastructure Project (NSIP) by the Planning Act 2008 because it constitutes a capacity increase of more than 10,000 air transport movements of cargo aircraft per annum.

3.1.3 The vision for the airport is that it will provide additional air freight and cargo handling capacity in the south-east of England in accordance with the Government's stated aim to maintain the UK's status as a global hub for aviation and making the best use of existing runways.

3.2 The Proposed Development

3.2.1 The Proposed Development comprises the following principal components:-

- Runways and taxiways suitable for the take-off and landing of a broad range of cargo aircraft;
- An area for cargo freight operations able to handle at least 10,000 air transport movements per annum and associated infrastructure, including:-
    (a) A new Air Traffic Control (ATC) tower;
    (b) A new fire station; and
    (c) A new fuel farm.
- Facilities for other airport related development, including:-
    (a) A new passenger terminal and associated facilities;
    (b) An aircraft teardown and recycling facility;
    (c) A flight training school;
    (d) A base for at least one passenger carrier;
    (e) A fixed base operation for executive travel; and
    (f) Business facilities for airport related organisations.

3.2.2 The proposed development involves the following works to be undertaken:-

- Upgrade of Runways 10 & 28 to allow CAT II/III operations;

- Construction of 19 European Aviation Safety Agency (EASA) compliant Code E stands for air freight aircraft with markings capable of handling Code D and F aircraft in different configurations;
- Re-alignment of the parallel taxiway (Alpha) to provide EASA compliant clearances for runway operations;
- Installation of new high mast lighting for aprons and stands;
- Construction of 65,500m^2 of cargo facilities;
- Construction of a new ATC tower;
- Construction of a new airport fuel farm;
- Construction of a new airport rescue and firefighting service (RFFS) station;
- Complete fit-out of airfield navigational aids;
- Construction of new aircraft maintenance/recycling hangars;
- Development of the 'Northern Grass' area for airport related businesses;
- Demolition of the redundant existing ATC Tower;
- Safeguarding of existing facilities for museums on the site;
- Highway improvement works, both on and off site; and
- Extension of passenger service facilities including an apron extension to accommodate an additional aircraft stand and increasing the current terminal size.

4 Assessment of Local Impacts

4.1 Traffic and Transportation

Introduction

4.1.1 KCC H&T has been engaged in extensive dialogue with the Applicant and their consultant team at both the pre- and post-application stages, with a view to reaching common ground on traffic and transportation matters. This dialogue is ongoing at the current time and it is anticipated that a revised Transport Assessment (TA) will be submitted in due course. The following comments nevertheless relate to the TA submitted with the DCO application, which is yet to be superseded and refer to a number of matters that were raised during the pre-submission process for the current DCO application.

Policy Context

4.1.2 It is not agreed that little weight should be placed on the Thanet Transport Strategy (TTS), as it forms a key component of the evidence base for the submitted Draft Local Plan. The Inner Circuit Route Improvement Strategy is certainly relevant and should be reflected in any proposals for the Manston Airport site to avoid a situation where the DCO scheme effectively prevents robust and affordable highway solutions from being implemented as part of the new Local Plan.

Strategic Transport Modelling

4.1.3 The Applicant's transport consultants have developed a spreadsheet traffic model of the local highway network, based on traffic count surveys of key junctions and links.

4.1.4 KCC H&T has developed its own SATURN strategic highway model, which has been used to test the impacts of Local Plan growth to 2031 and the programme of mitigation outlined within the TTS.

4.1.5 The KCC SATURN model has been developed using recently obtained trip origin and destination data, and is more dynamic in the way it assigns vehicle movements to the local highway network in response to land use change, traffic growth and mitigation. As such it is considered to be the most appropriate and consistent tool for assessing local development of this scale.

4.1.6 It is important that traffic impact assessment is undertaken consistently in line with the emerging Local Plan evidence base. In view of the above, following a request made by KCC, the KCC SATURN model has recently been utilised under commission by the Applicant to 'sense check' the outputs of the modelling work undertaken within the submitted TA (see below).

Consultation

4.1.7 With regard to Table 3.2 of the TA, the majority of the responses provided to KCC H&T's original consultation response are not accepted, particularly in respect of the assumptions made by aviation experts within the Applicant's project team. Given the proposed uses on the site require a 'first principles' approach to traffic

impact assessment, it is considered reasonable to request some objective evidence on which to base the key assumptions in the TA

4.1.8 A full, independent Stage 1 Road Safety Audit is required for all material highway alterations and new site access junctions. This is to ensure that all safety related issues are capable of being addressed prior to the determination of the application and will avoid a situation where the mitigation requires land outside of the Applicant's control. This is particularly important for proposed junction improvements at Spitfire Way/Manston Road, where initial concerns have been raised by the Highway Authority in relation to potential road safety concerns with the

4.1.9 The Thanet Parkway Station project remains a material consideration for this proposal. The delivery of a railway station on the periphery of the site would enhance its sustainability credentials, not least as the existing stations in Ramsgate and Birchington are not easily accessible. The project has secured part-funding through the Local Growth Fund and KCC is currently exploring other funding sources (including from surrounding development proposals).

Existing Conditions

4.1.10 Sections 4.4 to 4.6 of the TA[1] highlight the lack of pedestrian and cycling facilities in the site vicinity and the limited public transport offer. As such, the site is considered relatively unsustainable in highways and transportation terms at present. The TTS seeks to address this through the delivery of key interventions (notably the Inner Circuit Route Improvement Strategy and Thanet Parkway Station). It is therefore important that the Applicant's development proposals align directly with the Strategy.

4.1.11 The conclusions in Section 4.9 are not agreed with. The site is not accessible by a range of transport modes, as the constrained nature of the surrounding highway network and related traffic conditions, as well as the lack of pedestrian and cycle facilities and public transport services, act to reduce the attractiveness of non-car travel.

Development Proposals

4.1.12 Given that the future assessment year of the proposed development extends beyond the emerging Thanet Local Plan, site access junctions and off-site highway mitigation should be designed with Local Plan growth taken into account, to avoid a situation where this infrastructure becomes saturated by the end of the Plan period It will also allow an appropriate mitigation strategy to be identified in line with expected patters of growth within the local highway network.

Development Trip Generation

4.1.13 The trip generation methodology presented in the submitted TA is heavily based on assumptions that are not adequately justified or referenced to appropriate 'real world' examples in a number of cases (notably HGV movement profiles and load factors, and airport staff shift patterns and staffing requirements). This limits the

[1] Application Reference: 5.2-15 Environmental Statement – Volume 15 – Transport Assessment (Part 1)

ability of the Highway Authority to comment on their validity with a sufficient degree of confidence. Specific examples include:-

- It is forecast that a total of 340,758 tonnes of freight per annum will be reached in Year 20 (Table 6.3). If this is deemed to be the peak handling capacity of the facility, then an appropriate cap should be placed on any grant of Development Consent to ensure that the trip generation assessment presented in the TA is robust.

- The adjustment to the 'Total HGVs per annum' figures in Table 6.4 to allow for efficient working should be related to evidence from comparable facilities elsewhere within the UK.

- It is not considered realistic that HGV trips to the cargo facility would arrive and depart in an even profile throughout a typical 24-hour period. It is considered likely that there would be peaks and troughs associated with flight arrivals and departures and/or specific market demands. Moreover, the Planning Authority may place restrictions on night flights and potentially also HGV movements. Appropriate sensitivity testing should be undertaken to allow for these scenarios.

- It is not considered realistic that 80% of departing passengers would arrive at the airport three hours before flight departure. It is envisaged that passenger flights would be short-haul in nature and since the car park is located close to the terminal, and the terminal facilities will be relatively limited in comparison to other UK airports, it is more likely that the majority of passengers would arrive 1-2 hours before their departure time. Indeed, with the increasing uptake of online check-in options and the tendency for short-haul passengers not to place their luggage in the aircraft hold, it is likely that passenger arrival times of less than one-hour prior to departure will be relatively commonplace. Again, evidence from similar airports such as Southend would be valuable in this respect.

- It is not clear why the passenger mode share for "shared taxi" is anticipated to treble during the daytime (from 2% to 6%) and more than quadruple during the night time (from 2.8% to 11%) over a 20-year period – thereby surpassing the "taxi" mode share – as no significant changes to the relative attractiveness of this mode are proposed.

- There is limited information provided as to how the fuel tanker trip generation has been calculated. Further justification will be required in order for there to be sufficient confidence in these figures.

- It is noted that the office/administration staff are now assumed to follow a more traditional 9-5 working pattern, which is an improvement on previous assumptions. However, the majority of the operational staff shift patterns appear to avoid the AM and PM peak hours on the local highway network, which is considered overly optimistic and could potentially underestimate their impact. It is recommended that a sensitivity test is applied, whereby at least one-third of the operational staff generate peak hour trips.

Development Trip Distribution

4.1.14 There is a lack of robust justification for certain aspects of the trip distribution methodology presented. Examples include the assumed origins and destinations of passenger and freight trips within broad geographical areas, which are simply attributed to the "wider project team"[2].

4.1.15 It is not considered appropriate to distribute the Northern Grass area HGV trips on the same basis as the freight trips, as the nature of these businesses may be significantly different. Indeed, there is ambiguity within the Application around the nature of the uses proposed in the Northern Grass area which makes it difficult for the Local Highway Authority to determine how they would operate.

Development Trip Assignment

4.1.16 It is evident that the development trip assignment methodology has been principally based upon the Google real-time journey planner tool, which is a method often employed by transport planning professionals to assess likely vehicle routing in the absence of more locally specific modelling tools. However, in line with the previous comment regarding the limitations of spreadsheet traffic modelling, this approach is not capable of reflecting the changes in trip assignment arising from future development, traffic growth and associated transport mitigation measures; hence the need for the KCC SATURN model to be utilised for validation purposes.

Traffic Growth Assumptions

4.1.17 Whilst the use of adjusted TEMPRO traffic growth factors is noted, it is vital that the future year baseline traffic flows arising from this process are validated against those arising from the KCC SATURN model, which is fully aligned with the Draft Local Plan and Transport Strategy. The development is anticipated to build out across a period which extends beyond the current draft Local Plan, as such a spreadsheet approach is not capable of accurately representing the likely traffic conditions or configuration of the local road network within the proposed assessment year. For background growth that is not assessed within the KCC SATURN model (namely that which extends beyond the emerging Local Plan between 2031-2039), use of TEMPRO factors would however be acceptable.

Comparative Traffic Flow Assessment

4.1.18 As has been noted, the KCC SATURN model has recently been utilised by the Applicant to 'sense check' the outputs of the modelling work undertaken within the submitted TA. A summary of the traffic flow differences arising from this exercise for the AM Base and 2039 "With Development + Manston to Westwood Link Road" scenarios at a selection of key junctions in the vicinity of the Site is presented in Table 4-1 below. Please note that figures highlighted in bold text represent differences of more than 100 vehicles.

[2] See Application Reference: 5.2-15 Environmental Statement – Volume 15 – Transport Assessment (Part 2): Section 6.5.

Turning Movement	**2017 Base AM**			**2039 + Dev + Manston to Westwood Link**		
A256 / A299						
	Volume	2017 RO Base – 2016 KCC Base		Volume	KCC 2039+Dev+Manston to Westwood Link – RO 2039+Dev+Manston to Westwood Link	
Cottington Link-Hengist Way (N)	10	10		13	-7	-35%
Cottington Link-Hengist Way (E)	44	36	435%	55	-27	-33%
Cottington Link-Richborough Way	45	29	175%	56	-41	-42%
Hengist Way (N)-Hengist Way E	486	-35	-7%	609	**317**	109%
Hengist Way (N)-Richborough Way	508	-12	-2%	637	-21	-3%
Hengist Way (N)-Cottington Link	7	7		9	1	18%
Hengist Way (E)-Richborough Way	902	80	10%	1144	-51	-4%
Hengist Way (E)-Cottington Link	33	23	232%	41	-7	-14%
Hengist Way (E)-Hengist Way (N)	729	46	7%	913	**345**	61%
Richborough Way-Cottington Link	18	-7	-28%	23	19	524%
Richborough Way-Hengist Way (N)	356	11	3%	447	**-187**	-30%
Richborough Way-Hengist Way (E)	751	-47	-6%	1057	**240**	29%

A299 / Canterbury Road W						
	Volume	2017 RO Base – 2016 KCC Base		Volume	KCC 2039+Dev+Manston to Westwood Link – RO 2039+Dev+Manston to Westwood Link	
A299W-Cliffsend	211	**168**	390%	265	48	22%
A299W-A299S	957	**-117**	-11%	1200	**269**	29%
Cliffsend-A299S	83	83		11	-10	-47%
Cliffsend-A299W	8	-16	-67%	103	-10	-9%
A299S-A299W	1084	25	2%	1359	**217**	19%
A299S-Cliffsend	18	18		23	4	24%
A256 - B2190						
	Volume	2017 RO Base – 2016 KCC Base		Volume	KCC 2039+Dev+Manston to Westwood Link – RO 2039+Dev+Manston to Westwood Link	
B2190-A299 (E)	323	**154**	91%	404	-93	-19%
B2190-Tothill St	221	**170**	332%	278	-3	-1%
B2190-A299 (W)	233	-66	-22%	305	**-272**	-47%
A299 (E)-Tothill St	112	-11	-9%	140	33	30%
A299 (E)-A299 (W)	863	56	7%	1082	**502**	87%
A299 (E)-B2190	226	73	48%	283	**-268**	-49%
Tothill St-A299 (W)	130	33	34%	163	32	25%

Tothill St-B2190	160	49	44%	212	-94	-31%
Tothill St-A299 (E)	130	-68	-34%	163	79	94%
A299 (W)-B2190	295	20	7%	385	**-187**	-33%
A299 (W)-A299 (E)	921	**171**	23%	1157	**598**	107%
A299 (W)-Tothill St	110	34	45%	138	58	72%
B2190 - Minster Rd						
	Volume	2017 RO Base – 2016 KCC Base		Volume	KCC 2039+Dev+Manston to Westwood Link – RO 2039+Dev+Manston to Westwood Link	
Acol-B2190E	39	-28	-42%	51	22	74%
Acol-B2190S	297	76	35%	371	**185**	99%
B2190E-B2190S	480	**182**	61%	616	**-551**	-47%
B2190E-Acol	6	-27	-82%	7	-10	-57%
B2190S-Acol	201	28	16%	251	**117**	87%
B2190S-B2190E	480	**114**	31%	629	**-655**	-51%
B2190 - Columbus Ave						
	Volume	2017 RO Base – 2016 KCC Base		Volume	KCC 2039+Dev+Manston to Westwood Link – RO 2039+Dev+Manston to Westwood Link	
Columbus Ave-B2190E	16	-15	-48%	20	11	109%
Columbus Ave-B2190W	31	4	17%	39	**-416**	-91%
B2190E-B2190W	455	**150**	49%	585	**-148**	-20%
B2190E-Columbus Ave	84	-3	-4%	105	96	1073%
B2190W- Columbus Ave	173	22	15%	216	**-147**	-40%
B2190W-B2190E	346	64	23%	463	**-484**	-51%

B2050 - Manston Rd - Spitfire Way						
	Volume	2017 RO Base – 2016 KCC Base		Volume	KCC 2039+Dev+Manston to Westwood Link – RO 2039+Dev+Manston to Westwood Link	
B2050 (W)-Manston Road	32	32		71	**-113**	-61%
B2050 (W)-B2050 (E)	268	90	51%	378	**118**	45%
B2050 (W)-Spitfire Way	28	19	202%	35	6	20%
Manston Road-B2050 (E)	23	0	-2%	90	33	57%
Manston Road-Spitfire Way	177	-47	-21%	226	**-283**	-56%
Manston Road-B2050 (W)	14	14		22	-34	-61%
B2050 (E)-Spitfire Way	295	**118**	67%	377	**219**	139%
B2050 (E)-B2050 (W)	231	89	63%	293	**163**	126%
B2050 (E)-Manston Road	44	-9	-16%	202	**211**	-2373%
Spitfire Way-B2050 (W)	8	8	2324%	12	-3	-22%
Spitfire Way-Manston Road	167	8	5%	220	**-605**	-73%
Spitfire Way-B2050 (E)	154	-19	-11%	209	**165**	382%
B2050 - Manston Court Rd						
	Volume	2017 RO Base – 2016 KCC Base		Volume	KCC 2039+Dev+Manston to Westwood Link – RO 2039+Dev+Manston to Westwood Link	
(B2050 / Manston Ct Rd) B2050 (w)-Manston Ct Rd	97	25	35%	131	**128**	3684%
B2050W-B2050E	344	46	15%	465	**147**	46%
(B2050 / Manston Ct Rd) Manston Ct Rd-B2050 (e)	10	9	1135%	12	-71	-85%

(B2050 / Manston Ct Rd) Manston Ct Rd-B2050 (w)	112	47	74%	215	**210**	4273%
B2050E-B2050W	447	**150**	51%	820	**513**	167%
(B2050 / Manston Ct Rd) B2050 (e)-Manston Ct Rd	8	5	183%	10	-57	-85%
Nash Rd - Manston Rd - Tivoli Rd - Hartsdown Rd (Coffin House Corner)						
	Volume	2017 RO Base – 2016 KCC Base		Volume	KCC 2039+Dev+Manston to Westwood Link – RO 2039+Dev+Manston to Westwood Link	
Hartsdown Rd-Tivoli Rd	143	-29	-17%	179	**-349**	-66%
Hartsdown Rd-Nash Rd	258	-21	-8%	322	**370**	-773%
Hartsdown Rd-Shottendane Rd	53	28	108%	73	**-481**	-87%
College Rd-Nash Rd	24	24		30	-6	-16%
College Rd-Shottendane Rd	319	-36	-10%	460	**326**	243%
College Rd-Hartsdown Rd	247	13	5%	309	**113**	57%
College Rd-Tivoli Rd	39	37	1633%	49	-1	-1%
Nash Rd-Shottendane Rd	47	17	55%	59	42	254%
Nash Rd-Hartsdown Rd	167	30	21%	208	**186**	820%
Nash Rd-Tivoli Rd	52	-20	-28%	65	85	-418%
Shottendane Rd-Hartsdown Rd	28	20	242%	35	**-203**	-85%
Shottendane Rd-Tivoli Rd	312	**-155**	-33%	398	**-192**	-33%
Shottendane Rd-Nash Rd	114	-2	-2%	142	**153**	-1478%
Haine Rd - A256 - Canterbury Rd (West)						
	Volume	2017 RO Base – 2016 KCC Base		Volume	KCC 2039+Dev+Manston to Westwood Link – RO 2039+Dev+Manston to Westwood Link	

A256N-Overbridge	1011	93	10%	1287	**1183**	1135%
A256N-Canterbury Rd W	0	0		0	-16	-100%
A256N-New link						
Overbridge-Canterbury Rd W	64	40	167%	80	-14	-15%
Overbridge-New link						
Overbridge-A256N	787	**-308**	-28%	1147	**1419**	-522%
Canterbury Rd W-New link						
Canterbury Rd W-A256N	231	**192**	490%	292	54	23%
Canterbury Rd W-Overbridge	84	80	2082%	105	30	40%
Overbridge-A299E	164	4	2%	211	**-162**	-43%
Overbridge-Sandwich Rd	97	52	116%	121	64	111%
Overbridge-A229W	727	**126**	21%	926	**177**	24%
A299E-Sandwich Rd	114	64	127%	143	96	204%
A299E-A229W	904	-44	-5%	1130	65	6%
A299E-Overbridge	148	**-105**	-41%	227	**-104**	-31%
Sandwich Rd-A229W	13	13		16	10	158%
Sandwich Rd-Overbridge	63	60	2242%	82	30	57%
Sandwich Rd-A299E	58	57	4103%	73	19	36%
A229W-Overbridge	617	**-105**	-15%	890	**359**	68%
A229W-A299E	650	49	8%	814	**191**	31%
A229W-Sandwich Rd	4	4		5	3	137%
B2050 - Airport Access						
	Volume	2017 RO Base – 2016 KCC Base		Volume	KCC 2039+Dev+Manston to Westwood Link – RO 2039+Dev+Manston to Westwood Link	
B2050 (w)-RO passenger terminal access	0			28	-58	-68%

B2050 (w)-B2050 (e)	445			602	**327**	119%
RO passenger terminal access-B2050 (w)	0			4	-70	-95%
RO passenger terminal access-B2050 (e)	0			0	-47	-100%
B2050 (e)-B2050 (w)	559			1000	**750**	301%
B2050 (e)-RO passenger terminal access	0			49	-13	-21%

Table 4-1: Comparative Traffic Flow Assessment

4.1.19 It is apparent from this exercise that are significant differences in the model outputs, with each of the sample junctions experiencing variations of over 100 vehicles in the AM peak hour for at least one turning movement. On this basis, it is clearly not possible for the Local Highway Authority to draw firm conclusions as to the future traffic impacts of the Proposed Development until such time as revised junction capacity assessments reflecting the outputs of the KCC SATURN model are undertaken.

Junction Capacity Assessments and Mitigation Proposals

4.1.20 Notwithstanding the need for alignment with the KCC SATURN model and TTS, the following observations on the junction capacity assessments presented in the submitted TA are made:-

- It is not considered that the proposed scheme of mitigation for the A256 / Sandwich Road roundabout will deliver practical benefits to the capacity of the junction.[3] There is a known tendency for the ARCADY and PICADY modelling software to exaggerate the impact of minor amendments to kerb radii, flare lengths etc, which do not in reality provide meaningful capacity gains.

- Should the proposed scheme of mitigation for the A299 / A256 roundabout be taken forward, it will require refinement as the lane markings on the A256 northbound approach to the junction are potentially confusing and do not cater for right turning movements.[4] The ARCADY assessment should be updated accordingly. Additionally, swept path analysis should be undertaken to demonstrate that the three proposed circulatory lanes would operate safely.

- It is not considered that the proposed schemes of mitigation for the A299 / B2190 and A299 / A253 roundabouts will deliver practical benefits to the capacity of the junctions, in view of the limited flare lengths proposed.[5] There are potential highway safety implications arising from these short flare lengths, particularly on the A299 exit arms. This serves to underline the need for all mitigation proposals to be subject to an independent Stage

[3] See Application Reference: 5.2-15 Environmental Statement – Volume 15 – Transport Assessment (Part 2): Section 7.5 and Figure 7.1.
[4] See Application Reference: 5.2-15 Environmental Statement – Volume 15 – Transport Assessment (Part 2): Section 7.6 and Figure 7.2.
[5] See Application Reference: 5.2-15 Environmental Statement – Volume 15 – Transport Assessment (Part 2): Section 7.8 and Figures 7.3 and 7.4.

1 Road Safety Audit. Swept path analysis should be undertaken to demonstrate that the three proposed circulatory lanes would operate safely.

- It is apparent that the proposed scheme of mitigation for the A299 / A28 roundabout does not adequately address the impact of the Proposed Development, with significant residual queue length increases remaining on the A28 (East) arm in the AM peak and the A299 (West) arm in the PM peak.[6]

- An inconsistent approach is taken to the justification of capacity mitigation requirements. For example, mitigation is proposed to the Shottendane Road / Manston Road / Margate Hill junction[7], yet the impact of the proposed development is seen to be of a similar order of magnitude at the A28 / Park Lane / Station Road junctions[8], where mitigation is claimed to be unnecessary. This is not accepted.

- The Local Highway Authority has significant safety concerns with the proposed scheme of mitigation for the B2050 / Manston Road / Spitfire Way junction, in view of the incorporation of uncontrolled right turns and intervisibility splays between arms which appear to cross third party land.[9]

- The proposed scheme of mitigation for the B2050 / Manston Court Road junction is considered inadequate.[10] It is the opinion of the Highway Authority that Manston Court Road would act as a key route to the site from much of Thanet; however it is currently not of an appropriate standard to fulfil this function, due to its traffic calmed nature and constrained geometry. As such, full consideration should be given in the TA to the delivery of the proposed new link road between Westwood and Manston, which features as a key component of the TTS. Given that the proposed commercial development on the Northern Grass appears to serve no functional purpose to the operation of the airport to the south, and the Applicant has to date provided no justification to the contrary, this area can and should be re-designed to include this road.

- Further information is required detailing how the apparently modest scheme of mitigation for the Manston Road / Hartsdown Road / Tivoli Road / College Road / Nash Road junction (comprising a new signal head and stage sequence and new white lining) will take the junction from significantly over-capacity operation to generally within capacity outside of

[6] See Application Reference: 5.2-15 Environmental Statement – Volume 15 – Transport Assessment (Part 2): Section 7.10 and Figure 7.5.
[7] See Application Reference: 5.2-15 Environmental Statement – Volume 15 – Transport Assessment (Part 2): Section 7.13 and Figure 7.6.
[8] See Application Reference: 5.2-15 Environmental Statement – Volume 15 – Transport Assessment (Part 2): Section 7.11.
[9] See Application Reference: 5.2-15 Environmental Statement – Volume 15 – Transport Assessment (Part 2): Section 7.15 and Figure 7.7.
[10] See Application Reference: 5.2-15 Environmental Statement – Volume 15 – Transport Assessment (Part 2): Section 7.16 and Figure 7.8.

the PM peak hour, as this is not considered plausible on the basis of the details provided.[11]

- The proposed scheme of mitigation for the Ramsgate Road / College Road / A254 / Beatrice Road junction would appear to result in a highly unconventional junction layout which is unlikely to be acceptable to the Local Highway Authority, not least due to the lack of intervisibility between the stop lines.[12] Again, an independent Stage 1 Road Safety Audit will need to be submitted as part of any further justification for this scheme in order for an informed position to be identified.

- It is not considered that the proposed scheme of scheme of mitigation for the Ramsgate Road / Poorhole Lane / Margate Road / Star Lane roundabout will deliver practical benefits to the capacity of the junction.[13] There is a known tendency for the ARCADY and PICADY modelling software to exaggerate the impact of minor amendments to kerb radii, flare lengths etc, which do not in reality provide meaningful capacity gains.

- The proposed scheme of mitigation for the A256 / Manston Road junctions is not considered appropriate.[14] It would introduce a major signalised junction on the A256 Haine Road, where roundabouts are currently the predominant junction form. Moreover, it is apparent that there are potential highway safety issues with the proposed junction layout, arising from the need for 'ahead' traffic in the outside lane to merge to the left within the junction intersection. It is considered that the outside lanes on the northern and southern Haine Road approaches to the junction should be allocated to right turning traffic and the LinSig assessment updated accordingly.

- It is evident that there would be interaction between the A299 / A256 / Sandwich Road / Canterbury Road East roundabout and the adjacent Canterbury Road / Haine Road roundabout in the PM peak following the implementation of the proposed scheme of mitigation, with enhanced queue lengths on the A256 arm arising from the proposed development.[15] This is not acceptable to the Local Highway Authority and must be addressed, with the two junctions assessed within a network model.

- It is evident that there would be interaction between the B2014 Newington Road / Manston Road junction and the adjacent A255 / B2014 Newington Road roundabout in the PM peak following the implementation of the proposed scheme of mitigation, with enhanced queue lengths on the B2014 (south) arm arising from the proposed development.[16] This is not

[11] See Application Reference: 5.2-15 Environmental Statement – Volume 15 – Transport Assessment (Part 2): Section 7.17 and Figure 7.9.
[12] See Application Reference: 5.2-15 Environmental Statement – Volume 15 – Transport Assessment (Part 2): Section 7.18 and Figure 7.10.
[13] See Application Reference: 5.2-15 Environmental Statement – Volume 15 – Transport Assessment (Part 2): Section 7.19 and Figure 7.11.
[14] See Application Reference: 5.2-15 Environmental Statement – Volume 15 – Transport Assessment (Part 2): Section 7.20-7.21 and Figure 7.12.
[15] See Application Reference: 5.2-15 Environmental Statement – Volume 15 – Transport Assessment (Part 2): Section 7.23.
[16] See Application Reference: 5.2-15 Environmental Statement – Volume 15 – Transport Assessment (Part 2): Section 7.27 and Figure 7.14.

acceptable to the Local Highway Authority and must be addressed, with the two junctions assessed within a network model.

- It is evident that the capacity assessment files have not been submitted for review for Junctions 23 to 28, which means that a full appraisal cannot be undertaken.[17]

- It is not accepted that mitigation for Junctions 1 (A256 / Sandwich Road), 10 (Shottendane Road / Manston Road / Margate Hill), 17 (Ramsgate Road / Poorhole Lane / Margate Road / Star Lane), 26 (Newington Road / Manston Road) and 27 (Newington Road / High Street) should be discounted simply on the basis of the "wider network benefits" claimed for the overall mitigation package put forward. Since the Applicant has not made use of the KCC SATURN model to assess the strategic impact of the proposed development, it is not considered that such a position can be sufficiently justified or evidenced at present. A balanced view on mitigation requirements on the wider highway network may be possible in a scenario where positive and proportionate contributions are made to the emerging TTS.

Highway Safety Mitigation Proposals

4.1.21 Confirmation should be provided that the Applicant has the ability to implement the proposed scheme of mitigation to the Spitfire Way / Alland Grange Lane junction, as it appears to encroach on third party land.

On-Site Infrastructure Improvements

4.1.22 It is reiterated that a full, independent Stage 1 Road Safety Audit is required for all new proposed Site access junctions and highway link improvements.

4.1.23 The proposal to implement a linked signalised junction arrangement for the Northern Grass Area southern access and the passenger terminal access should be reconsidered. The introduction of signalised junctions is not considered appropriate in this location and indeed, the passenger terminal access junction is shown to operate close to theoretical capacity in the 2039 + Proposed Development scenario on the Manston Road (westbound) arm. It is suggested that uncontrolled junction layouts should be tested in the first instance. There is also doubt about the ability of this form of junction to accommodate future flows pertaining to the Inner Circuit Route Improvement Strategy, which is a key component of the emerging Thanet Transport Strategy.

Off-Site Infrastructure Improvements

4.1.24 Whilst the proposal to include 2.0m footways along the widened sections of Spitfire Way and Manston Road is welcome in principle, it is important that continuous and direct walking routes to local trip generators are provided where possible. It is notable in this respect that it is not proposed to provide such routes to local residential areas (notably Manston village), which is considered necessary in order to promote sustainable transport accessibility to the site by staff in

[17] See Application Reference: 5.2-15 Environmental Statement – Volume 15 – Transport Assessment (Part 2): Section 7.24-7.29.

particular. This could further encourage inappropriate pedestrian activity within the carriageway to the detriment of highway safety,

4.1.25 It is considered that use of the B2050 Manston Road through Manston village should be dissuaded, as it is not of an appropriate standard to convey significant additional traffic volumes. This would also have a detrimental effect on local residential amenity. It is anticipated that the implementation of the aforementioned Westwood to Manston link road would have a significant beneficial effect in this regard, which further underscores the importance of including this and other relevant interventions in the TTS within the assessment. It would also facilitate an opportunity to employ traffic management measures within Manston Village to dissuade traffic (particularly HGVs) from travelling through the village.

Construction Traffic Management Plan

4.1.26 The contents of the Construction Traffic Management Plan are noted. The proposed construction HGV routing strategic is considered appropriate in principle, subject to the prior implementation of an agreed programme of highway and access improvements.

Travel Plan

4.1.27 The contents of the Draft Travel Plan are noted. The success of the Travel Plan will be critical to the delivery of sustainable development on the site; however as drafted, it is considered insufficiently robust.

4.1.28 The mode share targets for staff and passengers should be more explicitly referenced to those achieved at similar UK airports and a detailed review of the measures within their respective Travel Plans and Surface Access Strategies undertaken.

4.1.29 The intention to levy a charge for staff car parking is noted and accepted in principle; however consideration should be given to the potential for overspill parking on the local highway network and how this could be mitigated against. The Highway Authority considers that there is a high likelihood of inappropriate parking occurring on the surrounding highway network by staff and passengers who wish to avoid parking charges.

4.1.30 The Applicant should make explicit commitments to provide specific measures to enhance the quality of non-car modes of travel at appropriate stages in the build out programme, including the re-routing and frequency enhancement of local bus services (informed by the advice of local operators) and the provision of new and improved walking and cycling routes to the site. The Draft Travel Plan currently lacks such detail, which casts doubt over the achievability of the mode share targets presented.

Car Park Management Strategy

4.1.31 The contents of the Car Park Management Strategy are noted. KCC H&T will request that a condition be placed on any grant of Development Consent requiring the submission and agreement of a detailed Car Park Management Strategy prior to occupation of the Proposed Development. As stated above, this will need to

take account of the potential for overspill parking on the local highway network and how this may be addressed.

5 Summary and Conclusion

5.1.1 This report comprises the Local Import Report (LIR) of Kent County Council Highways and Transportation (KCC H&T) in relation to the application by RiverOak Strategic Partners Ltd for an Order Granting Development Consent (DCO) for the upgrade and reopening of Manston Airport.

5.1.2 The LIR provides a description of the site, details of the proposal and summarises the relevant national and local planning policies before reviewing the traffic and transportation impacts of the proposed development and the extent to which these have been adequately addressed by the Applicant.

5.1.3 The Site- and junction-specific – rather than strategic – approach to capacity assessment taken in the TA has been shown to be inappropriate, resulting in highway mitigation proposals that deliver only partial benefits and which do not align with or incorporate the robust, long-term solutions proposed by the Thanet Transport Strategy.

5.1.4 The Local Highway Authority has safety concerns with a number of the proposed mitigation measures, and is also concerned that the Proposed Development could give rise to on-street parking on the surrounding highway network.

5.1.5 It is noted that Highways England has raised its own concerns regarding the impact of the Proposed Development on the Strategic Road Network. The efficient and reliable operation of the Strategic Road Network is important to that of the local highway network in East Kent due to the interface between them and as such it is essential that the impacts on both networks are adequately assessed and mitigated.