



**FAO the Manston Airport Case Team**

Secretary of State for Transport  
Manston Airport Case Team  
c/o Planning Inspectorate  
National Infrastructure Planning  
Temple Quay House, 2 The Square  
Temple Quay  
Bristol  
BS1 6PN

manstonairport@planninginspectorate.gov.uk

**Growth and Communities**

Invicta House  
County Hall  
Maidstone  
ME14 1XX

Phone: 03000 419225  
Ask for: Sarah Platts  
Email: [REDACTED]@kent.gov.uk

9 July 2021

**BY EMAIL ONLY**

Dear Sir/Madam,

**Re: Re-determination of the Application by RiverOak Strategic Partners Limited ("the Applicant") for an Order granting Development Consent for the reopening and development of Manston Airport in Kent**

Thank you for the opportunity to submit further representations for the purposes of the re-determination of this application, in accordance with rule 20(2) of the Infrastructure Planning (Examination Procedure) Rules 2010.

The County Council has previously provided full comments in response to the deadlines associated with the Development Consent Order (DCO) formal consultation process and would refer to these submissions, which remain relevant to the consideration of this DCO. In respect of the matters for further consideration set out in the letter dated 11 June 2021, the County Council makes the following comments.

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**Highways and Transportation:** Thanet District Council's Local Plan was adopted on the 9 July. Within the Local Plan Policy SP47 "Strategic Routes", there is specific reference to the need for development at Manston Airport to provide proportionate contributions to highway improvements and on-site highway provision (policy extract and link in appendix 1, below). This is consistent with the views that the County Council presented throughout the Examination, but by way of an update, is now adopted policy, rather than an emerging policy.

In addition, Thanet Parkway Railway Station was in the planning stages during the Examination of the Manston Airport Development Consent Order. It now has planning permission (TH/19/1696) and works have commenced on-site. It is not considered that this development materially changes the County Council's views put forward in the various stages of the Examination of the Manston Airport Development Consent Order, though it is worth noting that there will be a positive change in terms of accessibility of public transport, providing more options for sustainable travel planning and public transport strategy.

**Sustainable Business and Communities:** Published in September 2020, the Kent and Medway Energy and Low Emissions Strategy sets out how KCC, in partnership with Medway Council and District/Borough Councils in Kent, will respond to the UK climate emergency and drive clean, resilient economic recovery across the county. It sets a target to reduce greenhouse gas emissions in the county to net-zero by 2050, eliminate poor air quality and fuel poverty and deliver a clean, affordable and secure energy supply. In re-determining the application, the Secretary of State should have regard to the County Council's target (which is also a joint target for Kent and Medway, as set out in the Kent and Medway Energy and Low Emissions Strategy) to lower the area's emissions to Net Zero by 2050.

**Heritage and Conservation:** There are major excavations happening in relatively close proximity to the application site, which have altered the study area evidence base and provided additional knowledge in terms of the archaeology in the wider landscape. However, this is not considered to have a particular bearing on the consideration of the site as it is already known that the potential is high.

**SuDS:** The County Council has no new specific matters to raise in relation to surface water drainage since 9 July 2019, although its Drainage and Planning Policy was published in December 2019<sup>1</sup>. Any future design of surface water drainage should have regard to this policy and will need to be addressed through detailed design.

**Minerals and Waste:** For information, the adopted Kent Minerals and Waste Local Plan 2013-30 was partially reviewed in 2020. However, there are no safeguarded land-won minerals or safeguarded mineral and/or waste management infrastructure at or within the Manston Airport site. Therefore, the policy provision of this part of the adopted Development Plan is not relevant to this proposal.

**Biodiversity:** The County Council notes the proposal to legislate to introduce biodiversity net gain for new nationally significant infrastructure projects in England through an amendment to the Environment Bill, which should be taken into account in the redetermination of the application.

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<sup>1</sup> <https://www.kent.gov.uk/about-the-council/strategies-and-policies/environment-waste-and-planning-policies/flooding-and-drainage-policies/drainage-and-planning-policy-statement>

The County Council requests that the Examining Authority has due consideration of KCC's submissions throughout this Examination process when assessing the proposal. The County Council will continue to work with the applicant and Examining Authority as required on any matters that may arise to assist in the Secretary of State's re-determination of this application.

Should you require any additional information or clarification, please do not hesitate to contact me.

Yours sincerely,

A large black rectangular box redacting the signature of Stephanie Holt-Castle.

**Stephanie Holt-Castle**  
**Director of Growth and Communities**

## **Appendix 1: Thanet Local Plan extract: Policy SP47 – Strategic Routes**

**Link:** <https://www.thanet.gov.uk/wp-content/uploads/2018/03/Thanet-Local-Plan-July-2020-1-1.pdf>

### **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: 1) Birchington strategic housing site 2) B2050 Manston Road, Birchington 3) Shottendane Road (from Birchington to Margate) 4) Shottendane Road-Manston Road - Hartsdown Road housing site 5) Nash Road-Manston Road housing site 6) Nash Road, Margate 7) Nash Road-Westwood strategic housing site 8) Manston Court Road/Star Lane (from Haine Road, Westwood to B2050 Manston Road) 9) From Columbus Way to Manston Road, Birchington The following strategic routes are sufficient in their existing form to provide for the growth envisaged in the Plan)(subject to the Local Plan review process set out in Policy SP03).

However, if further development is permitted, including further development at Manston Airport, which has a material impact on the capacity or operation of these routes, 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 is thereby necessitated:

- 1) B2050 Manston Road (from Manston Court Road to Spitfire Junction
- 2) B2190 Spitfire Way (from Spitfire Junction to Columbus Avenue junction).

Junction/traffic management improvements are required at the following junctions to ensure the fully effective functioning of the Inner Circuit. Development that compromises the ability to deliver such improvements will not be permitted:

- 1) Victoria Traffic Lights
- 2) Coffin House Corner Traffic Lights

The Council expects all new development to make a proportionate contribution to the provision of this key infrastructure. In the event that there is any delay in site acquisition or assembly in relation to any of the schemes identified in Policy SP47, the Council will, in conjunction with the County Council, make interim highway arrangements to enable allocated development schemes to proceed.