

## RAMSGATE HERITAGE ACTION ZONE

- A. Ramsgate has been chosen as one of the country's first 'Heritage Action Zones' (HAZ).
- B. It is one of just 10 areas chosen and the only one in the South East.
- C. Using the heritage in the town, which has 443 listed buildings, the project aims to attract new investment into Ramsgate and create apprenticeships, boost tourism and involve schools and the community in exhibitions and heritage-related skills training.
- D. The Heritage Action Zone in Ramsgate will look to achieve economic growth by using the historic environment as a catalyst.
- E. The aim is for the Heritage Action Zone to grow Ramsgate into a prosperous maritime town where outstanding heritage and architecture coupled with new investment and development strengthens the economy for the benefit of the local community.
- F. It has national policy status.
- G. Applicant has not given the Ramsgate HAZ any consideration.

## RAMSGATE CONSERVATION AREA

- A. Ramsgate has the largest conservation area in Kent<sup>1</sup> and a large number of listed buildings<sup>2</sup>.
- B. A large number of them are under the flight swathes<sup>3</sup>.
- C. The impact of the Applicant proposal on the Conservation Area of Ramsgate **must be considered under statute and case law**.
- D. Clearly this has not happened as the Applicant drew a 1km line from Manston as the boundary for the Environmental Statement.
- E. The relevant statute law that must be considered is **Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990** and **Section 66(1) of the 1990 Act**.

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<sup>1</sup> Colliers International (October 2018) Creative Industries in Historic Buildings and Environments Conservation Area Case Studies Page 81

<sup>2</sup> Listed Buildings in Ramsgate, Thanet, Kent

<sup>3</sup> Map showing Ramsgate Conservation Area (c) Thanet District Council

- F. The relevant case law is **Barnwell Manor Wind Energy Ltd v East Northamptonshire District Council and Others: CA 18 Feb 2014**<sup>4</sup>.
- G. The cited statute and case law requires a **decision-maker** to give the **desirability of preserving the building or its setting** not merely careful consideration but **considerable importance and weight** when balancing the advantages of the proposed development against any harm from wind farm development or in this case aeroplanes.

**EXAMPLES OF INWARD INVESTMENT TO RAMSGATE SINCE THE AIRPORT CLOSED IN MAY 2014 (PARTICULARLY USING EMPTY OR UNUSED HERITAGE SITES)**

- A. Micro Museum Expansion (2019)
- B. Van Gogh Sculpture in Spencer Square (2019)
- C. Wetherspoons (Royal Victoria Pavillion) (2017) a UK Top Employer<sup>5</sup> £4.5m development (Number of tables just under 350 with large terrace, covers 900, staff went up to 200 currently in January 120-130)
- D. Foresters Hall which has been a community venue for over 200 years purchased by East Kent Mencap through a Community Asset Transfer (2019)
- E. St Augustine's Visitor Centre built in 1860 (GBP 1.2m)
- F. Albion House (17 bed luxury hotel) (2014) built in 1791 *voted The Telegraph's "The 50 Most Romantic Hotels in Europe" - in at number 15 (March 2017), The Times "20 Great hotels for a Weekend away" in at Number 10 (March 2017), The Times "Best Places by the Sea" (Number 26) (May 2016)*
- G. Archive Homestores (10 staff members) in the Military Arches
- H. Pugin's The historical Grade II Listed former Hovis Flour Mill in central Ramsgate is being transformed into a mix of contemporary residences

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<sup>4</sup> Weekly Law Reports (ICLR)/2015/Volume 1 /\*East Northamptonshire District Council and others v Secretary of State for Communities and Local Government and another - [2015] 1 WLR 45

<sup>5</sup> [REDACTED]

- I. £27 million development of old Ramsgate police station Cavendish Street and former Magistrate's House (2017/8)
- J. Landmark Trust's Grade I listed the Grange (1844) holiday home.
- K. Falstaff built in 1801 within the West Cliff conservation area as well as three seaside vacation apartments
- L. Petticoat Emporium (2015) 75 individual traders covering 205 pitches as well as a variety of cabinets, rails and display options and two shops run by the shop owners: Coastal Chic and Bow Street Bags (14 staff members)
- M. Ellington Park has been awarded £1.64m support from the Heritage Lottery fund **to regenerate and conserve the park.**
- N. Ramsgate is part of *Pioneering Places* an ambitious project that will make East Kent an even better place to live, work and visit by exploring heritage, developing civic pride and connecting artists and communities. The investment will act as a catalyst for Ramsgate's vibrant and growing cultural scene, bringing with it greater community cohesion, educational attainment and a positive impact on jobs, health and wellbeing. The focus is a **public artwork** commissioned at a value of £300,000 of the £1,489,255 funding to be **positioned at the Royal Harbour environs.**
- O. Ramsgate received an initial £50,000 funding to rescue Ramsgate's Rock Gardens for work on the Pulhamite rocks on the Madeira Walk fountain and Albion gardens.
- P. The Military Arches have 100% occupancy now (rather than 50%) (2013/14)
- Q. Ramsgate Music Hall (voted best small venue by NME in 2015)
- R. Ramsgate Tunnels (re-opened May 2014)
- S. Circa twenty restaurants and cafes and circa 10+ shops have opened since the airport closed.

## **TOURISM**

There has also been an unprecedented amount of tourists to Thanet year on year<sup>6</sup> and part of the tourist offer is heritage-based tourism as well as active/leisure tourism and café culture.

## **HOUSE PRICES**

The number of estate agents has increased since the closure of the airport. House prices have risen by an average of 34.31%<sup>7</sup> in the last 5 years compared to 30.17%<sup>8</sup> in Brighton and 25.28%<sup>9</sup> in London as well as the number of outdoor events and activities. There is also a steady rise in commuters and DFLs (Down From London/ Elsewhere).

## **PUBLIC FUNDING**

Applicant stated within its Summary of Applicant's Oral Submissions at January 2019 Hearing (**TR02002/D1/Sub<sup>10</sup>**) on page 48 at 9.1.2 that (bold and underline added for emphasis):

*"the applicant's project will **not involve any public funding whatsoever**".*

The Applicant's project **will involve public funding** if the DCO is granted.

### **1. TRANSPORT ASSESSMENT**

- A. Applicant has based its Transport Assessment on the former Thanet Transport Plan (2005). Applicant states that in preparation of its Transport Assessment for the proposed development:

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<sup>6</sup> [REDACTED]

<sup>7</sup> Zoopla House Price Function

<sup>8</sup> *Ibid*

<sup>9</sup> *Ibid*

<sup>10</sup> Summary of Applicant's Oral Submissions at January 2019 Hearing (**TR02002/D1/Sub**)  
[REDACTED]

*'little weight has been placed on [Draft 1] Thanet District Transport Strategy [2015-2031] as with the [draft] Local Plan which has stalled in the planning process<sup>11</sup>.'*

Draft 2 July 2018 version is the latest version of the Thanet District Transport Strategy (2015-2031)<sup>12</sup> currently on Thanet District Council website it is based on the Manston Airport site being used for **mixed-use development not an airport**.

- B. As you will be aware Thanet District Council's draft Local Plan is currently with Inspectors for an independent examination.
- C. Irrespective of the decisions of the Inspectors and the outcome of the Local Plan, it is my understanding that if the Applicant's DCO is granted it would effectively 'trump' the provisions in any version of the Local Plan for this site.
- D. In the event of the DCO is granted, Thanet District Council and Kent County Council would need to prepare and absorb the costs of another *Thanet District Transport Strategy (2015-2031)* with the airport on the former Manston Airport site.
- E. The new *Thanet District Transport Strategy (2015-2031)* would include both the provisions identified in **Table 1** below as well as any new provisions specific to the former Manston Airport site being used as a dedicated freight airport.

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<sup>11</sup> 5.2-15 Environmental Statement - Volume 15 - Transport Assessment (Part 1) (**APP-060**) Paragraph 2.4.7

<sup>12</sup> Thanet District Council (July 2018) *Thanet District Transport Strategy (2015-2031)*

F. **Table 1: Transport Works Identified On or Around The Former Manston Airport under the Current Thanet District Transport Strategy (2015-2031)**<sup>13</sup>

Type	Description	Reason	Potential Funding Source	Cost
Road	Create new road between Toby Carvery Roundabout (A256) and B2050 ( <b>Across Northern Grass within Manston Airport site</b> ) to provide relief to Haine Road Corridor. Improve approach and roundabout at Westwood Cross to increase capacity	To provide enhanced access to Westwood, manage congestion and relieve the A256 Haine Road Corridor.	S106 / Part on Site	£12,000,000 (Off site Section)
Road	Improvements Spitfire junction	To manage safety at this junction	S278	£1,000,000
Cycle	Creation of a shared facility between Canterbury Road West, Ramsgate and Canterbury Road East using existing bridge facility to the east of Haine Road and north of Canterbury Road East	To link Cliffsend to wider highway network. Improve access to Mixed use development on <b>Former Manston Airport Site</b>	S106 / CIL / LTP	TBC
Cycle	Upgrade Footpath TR9 to Bridleway	To Link <b>Former Manston Airport</b> allocation to Manston Green and wider Highway network	S106 / CIL / LTP	£46,000
Cycle	Improve surface of Bridleway TR10 and widen to 3m	To Link <b>Former Manston Airport</b> allocation to Manston Green and wider Highway network	S106 / CIL / LTP	£143,000

<sup>13</sup> Thanet District Council (July 2018) *Thanet District Transport Strategy (2015-2031)* Appendix C Infrastructure Proposals

## 2. CONSULTATION (HEALTH, NOISE, TRANSPORT)

- A. Environmental Statement has **not been prepared on a worst-case basis of number of ATMs** (freight and passenger).
- B. The worst case scenario in relation to environmental matters must be based upon the Applicant's own statements in its application that (bold has been added for emphasis):

*"the increase in capability is therefore **83,220 movements per year of cargo aircraft**<sup>14</sup>".*

*"...the forecast number of movements for year 5 is a total (freight and passenger) of 15,000...By year 10 the forecast is for **18,354 movements per year**...The year 20 forecast is **26,469 [movements] per year**<sup>15</sup>..."*

The corroborates Applicant's own statement that:

*"The assessed number of **17,170 flights** is therefore not, and is not likely to become, **a cap on the capability** of the posed Development<sup>16</sup>".*

## 3. CONSULTATION (HEALTH, NOISE, TRANSPORT, LOCAL IMPACT REPORTS)

- A. Applicant has submitted the full re-opening of the airport is envisaged in 2020 following the construction activities required to return the airport to full operational use. The first full year of freight operation is expected in 2021<sup>17</sup>. Local Impact Reports have been compiled on this basis; however, this is not achievable and is based on incorrect assumptions rather than facts.

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<sup>14</sup> RiverOak Strategic Partners (2018) 2.3 NSIP Justification TR020002/App/2.3 APP---008 at Clause 24

<sup>15</sup> Consultation Report (APP-075) Page 192

<sup>16</sup> *Ibid* at Clause 33

<sup>17</sup> Azimuth Report Volume IV (APP-085) Page 28/29

- B. There are a number of known deadlines which confirm that if the DCO is granted (and funding and financing was in fact in place) the first full re-opening of the airport not **until 2022 at the very earliest with the first full year of freight expected in 2023**. A table showing Applicant's Known Tasks and Timelines to Date is to follow on the next page (**Table 2**).
- C. As you will be aware the DCO if granted will happen before a great number of things will/ can happen.
- D. Further, any investors in RiverOak Strategic Partners Limited will need to know and be comfortable that a return on any of their investment in 2016/2017/2018/2019/2020/2021 will not be seen until sometime in 2022/3 at the very earliest.







# British Listed Buildings (/)

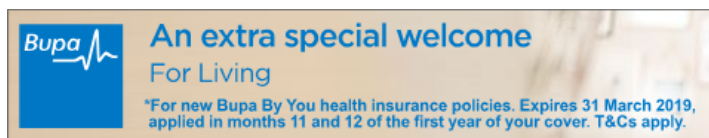
History in Structure

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## Listed Buildings in Ramsgate, Thanet, Kent









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5. II [10, 11 and 12, La Belle Alliance Square \(/101085343-10-11-and-12-la-belle-alliance-square-ramsgate\)](/101085343-10-11-and-12-la-belle-alliance-square-ramsgate)  
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9. II [12, Broad Street \(/101100299-12-broad-street-ramsgate\)](/101100299-12-broad-street-ramsgate)  
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




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89. II [64, the Plains of Waterloo \(/101086079-64-the-plains-of-waterloo-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
90. II [65 and 67, Pegwell Road \(/101055810-65-and-67-pegwell-road-ramsgate\)](#)  
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91. II [65a, Pegwell Road \(/101085330-65a-pegwell-road-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
92. II [66, Park Road \(/101054771-66-park-road-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
93. II [7, 9 and 11, Paradise \(/101336659-7-9-and-11-paradise-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
94. II [7, Park Road \(/101085326-7-park-road-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
95. II [70, High Street \(/101085359-70-high-street-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
96. II [72, High Street \(/101085358-72-high-street-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
97. II [72, the Plains of Waterloo \(/101055722-72-the-plains-of-waterloo-ramsgate\)](#)  
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98. II [79, the Plains of Waterloo \(/101085334-79-the-plains-of-waterloo-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
99. II [8, West Cliff Road \(/101336320-8-west-cliff-road-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
100. II [80 and 82, Hardres Street \(/101356146-80-and-82-hardres-street-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
101. II [81, Addington Street \(/101186857-81-addington-street-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
102. II [83, Addington Street \(/101085451-83-addington-street-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
103. II [85 and 87, King Street \(/101085340-85-and-87-king-street-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
104. II [9, 11, 13 and 15, Cavendish Street \(/101100313-9-11-13-and-15-cavendish-street-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
105. II [Access Road, Underpass and Retaining Walls from Court Stairs to Western Undercliff \(/101086050-access-road-underpass-and-retaining-walls-from-court-stairs-to-western-undercliff-ramsgate\)](#)  
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106. II [Admiral House \(/101336686-admiral-house-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
107. II [Age Concern foresters Hall \(/101040072-age-concernforesters-hall-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
108. II [Albion House \(/101085418-albion-house-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
109. II [Ash House \(/101356123-ash-house-ramsgate\)](#)   
Ramsgate, Thanet, Kent, CT11
110. II\* [Barn About 50 Metres East of Ozengell Grange \(/101336669-barn-about-50-metres-east-of-ozengell-grange-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
111. II [Barn at Rose Farm \(Tr 3590 6695\) \(/101085415-barn-at-rose-farm-tr-3590-6695-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT12
112. II [Battlemented Courtyard with Towers and Internal Wall \(/101085337-battlemented-courtyard-with-towers-and-internal-wall-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
113. II [Bench and Platform About 50 Metres East of Sunshelter \(/101203661-bench-and-platform-about-50-metres-east-of-sunshelter-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
114. II [Bon Secours Nursing Home \(/101085347-bon-secours-nursing-home-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
115. II [Boundary Wall to Coastguard Cottages, East, South and West of Courtyard \(/101086072-boundary-wall-to-coastguard-cottages-east-south-and-west-of-courtyard-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
116. II [Bowls Pavillion \(/101086087-bowls-pavillion-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
117. II [Brenan House mendleshan \(/101203515-brenan-housemendleshan-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
118. II [Brewery Buildings, Now Depository \(/101348497-brewery-buildings-now-depository-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
119. II [Cavendish Villas and Railed Area \(/101348525-cavendish-villas-and-railed-area-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
120. II [Carramore Residential Hotel \(/101281502-carramore-residential-hotel-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
121. II [Carriage Gates and Gate Piers, Walls and West Wicket Gate, the Grange, Without House \(/101336329-carriage-gates-and-gate-piers-walls-and-west-wicket-gate-the-grange-without-house-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
122. II [Cavendish Baptist Church \(/101348516-cavendish-baptist-church-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
123. II\* [Cemetery Chapels \(/101348349-cemetery-chapels-ramsgate\)](#)   
Ramsgate, Thanet, Kent, CT11
124. II [Chandos Cottage \(/101281661-chandos-cottage-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
125. II [Chapel and Library, St Lawrence College \(/101388303-chapel-and-library-st-lawrence-college-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
126. II [Chapel Cottage \(/101063722-chapel-cottage-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
127. II [Chapel Cottage \(/101085397-chapel-cottage-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
128. II [Chartham Terrace and Garden Wall to Right \(/101336328-chartham-terrace-and-garden-wall-to-right-ramsgate\)](#)   
Ramsgate, Thanet, Kent, CT11
129. II [Chatham Arms \(/101085341-chatham-arms-ramsgate\)](#)   
Ramsgate, Thanet, Kent, CT11
130. II [Chatham House School and Railed Area \(/101336641-chatham-house-school-and-railed-area-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
131. II [Chest Tomb About 20 Metres South of Chancel of Church of St Laurence \(/101085371-chest-tomb-about-20-metres-south-of-chancel-of-church-of-st-laurence-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
132. II [Chest Tomb and 3 Headstones About 10-20 Metres North of Chancel of Church of St Laurence \(/101085364-chest-tomb-and-3-headstones-about-10-20-metres-north-of-chancel-of-church-of-st-laurence-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11

133. II [Chest Tomb of James and Mary Townley and 4 Other Railed Tomb Chests About 25 Metres North West of Ch \(/101085367-chest-tomb-of-james-and-mary-townley-and-4-other-railed-tomb-chests-about-25-metres-north-west-of-church-of-st-laurence-ramsgate\)](#)  [MENU](#)  
Ramsgate, Thanet, Kent, CT11
134. II [Chest Tomb to Thomas Tomson and Headstone to Anne Tomson, South of Church of St Laurence \(/101372252-chest-tomb-to-thomas-tomson-and-headstone-to-anne-tomson-south-of-church-of-st-laurence-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
135. II\* [Chilton Farmhouse \(/101085400-chilton-farmhouse-ramsgate\)](#)   
Ramsgate, Thanet, Kent, CT11
136. II [Christ Church \(/101086069-christ-church-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
137. I [Church of St Augustine of England \(Roman Catholic\) with Cloisters Attached \(/101281779-church-of-st-augustine-of-england-roman-catholic-with-cloisters-attached-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
138. I [Church of St George \(/101085430-church-of-st-george-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
139. I [Church of St Laurence \(/101336662-church-of-st-laurence-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
140. II [Church of the Holy Trinity \(/101085426-church-of-the-holy-trinity-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
141. II [Churchill House School with Railed Area \(/101086059-churchill-house-school-with-railed-area-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
142. II [Clanmire House \(/101281666-clanmire-house-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
143. II [Claremont \(/101281635-claremont-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
144. II [Clifton Villa \(/101336343-clifton-villa-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
145. II [Coachhouse About 10 Metres North West of Barn at Rose Farm \(/101068559-coachhouse-about-10-metres-north-west-of-barn-at-rose-farm-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT12
146. II [Coastguard Cottages \(/101203551-coastguard-cottages-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
147. II [Coastguard Cottages \(/101203557-coastguard-cottages-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
148. II [Coastguard Cottages \(/101336317-coastguard-cottages-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
149. II\* [Conservatory and Wall to Which It is Attached \(/101085336-conservatory-and-wall-to-which-it-is-attached-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
150. II [Croquet Pavillion \(/101374398-croquet-pavillion-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
151. II [Custom House with Forecourt \(/101068641-custom-house-with-forecourt-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
152. II [Duke of York \(/101085416-duke-of-york-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
153. II [Eagle Lodge \(/101086047-eagle-lodge-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
154. II [Earl St Vincent \(/101336690-earl-st-vincent-ramsgate\)](#)   
Ramsgate, Thanet, Kent, CT11
155. II [East Cliff House \(/101315682-east-cliff-house-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
156. II [East Court \(/101086073-east-court-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
157. II [East Pier, No 1 Slipway, Bollards and Victoria or Dover Stairs \(/101086088-east-pier-no-1-slipway-bollards-and-victoria-or-dover-stairs-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
158. II [Eastcliff Bandstand Including Attached Dance Floor, Steps and Boundary Wall with Railing \(/101096005-eastcliff-bandstand-including-attached-dance-floor-steps-and-boundary-wall-with-railing-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
159. II [Eastcliff Lift \(/101391989-eastcliff-lift-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11

160. II [Eastern of two Concrete Second World War 4-inch gun emplacements \(/101429581-eastern-of-two-concrete-second-world-war-4-inch-gun-emplacements-ramsgate\)](#)  [MENU](#)  
Ramsgate, Thanet, Kent, CT12
161. II [Elephant and Castle \(/101085389-elephant-and-castle-ramsgate\)](#)   
Ramsgate, Thanet, Kent, CT11
162. II [Ellens Place with Railed Areas \(/101068765-ellens-place-with-railed-areas-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
163. II [Entrance Gates with Gatepiers to North West of the Montefiore Synagogue \(/101378741-entrance-gates-with-gatepiers-to-north-west-of-the-montefiore-synagogue-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
164. II [F Hinds \(/101356173-f-hinds-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
165. II [Fire Station \(/101101734-fire-station-ramsgate\)](#)   
Ramsgate, Thanet, Kent, CT11
166. II [Former Alexandra Hotel \(/101068630-former-alexandra-hotel-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
167. II [Former Congregational Church \(/101336692-former-congregational-church-ramsgate\)](#)   
Ramsgate, Thanet, Kent, CT11
168. II [Former Kent Adult Education Centre \(/101392983-former-kent-adult-education-centre-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
169. II [Former Smack Boys' Home \(/101376868-former-smack-boys-home-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
170. II [Fountains Pool About 50 Metres West of Sunshelter and Rock Gardens \(/101281609-fountains-pool-about-50-metres-west-of-sunshelter-and-rock-gardens-ramsgate\)](#)   
Ramsgate, Thanet, Kent, CT11
171. II [Free Standing Wall Monument to Maxton/Holman Families, About 30 Metres West of Church of St Laurence \(/101336663-free-standing-wall-monument-to-maxtonholman-families-about-30-metres-west-of-church-of-st-laurence-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
172. II [Free Standing Wall Monuments to Mayhew/Garrett Families and Wall Monument and 5 Chest Tombs About 30 \(/101085368-free-standing-wall-monuments-to-mayhewgarrett-families-and-wall-monument-and-5-chest-tombs-about-30-metres-south-west-of-church-of-st-laurence-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
173. II [Freemasons Tavern \(/101068838-freemasons-tavern-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
174. II [Gas Works, Offices with Railed Area, Depot and Adjoining Walls and Gate \(/101085429-gas-works-offices-with-railed-area-depot-and-adjoining-walls-and-gate-ramsgate\)](#)   
Ramsgate, Thanet, Kent, CT11
175. II [Gate and Gatepiers About 20 Metres West of Nos 1 and 2 \(/101203426-gate-and-gatepiers-about-20-metres-west-of-nos-1-and-2-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
176. II [Gate House and Walls Attached \(/101085338-gate-house-and-walls-attached-ramsgate\)](#)   
Ramsgate, Thanet, Kent, CT11
177. II [Gate House to Cemetery About 50 Metres South of Cemetery Chapel, with Side Walls \(/101085436-gate-house-to-cemetery-about-50-metres-south-of-cemetery-chapel-with-side-walls-ramsgate\)](#)   
Ramsgate, Thanet, Kent, CT11
178. II [Gates and Quadrant Walls Attached to King George VI Memorial Garden \(/101336689-gates-and-quadrant-walls-attached-to-king-george-vi-memorial-garden-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
179. II [Gates and Railings to Churchyard of St George \(/101085432-gates-and-railings-to-churchyard-of-st-george-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
180. II [Gateway and Walls to Former Abbey School \(/101338880-gateway-and-walls-to-former-abbey-school-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
181. II [Gentlemans Toilet at Montefiore Synagogue and Mausoleum \(/101390615-gentlemans-toilet-at-montefiore-synagogue-and-mausoleum-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
182. II [George and Dragon Public House \(/101348550-george-and-dragon-public-house-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
183. II [Grace Cottage \(/101054046-grace-cottage-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11




184. II [Granville House the Granville \(/101203535-granville-house-the-granville-ramsgate\)](#)   
Ramsgate, Thanet, Kent, CT11 [MENU](#)
185. II [Granville Marina \(/101391165-granville-marina-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
186. II [Granville Terrace st Clu Hotel \(/101086071-granville-terrace-st-clu-hotel-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
187. II [Group of 11 Brick Chest Tombs to South of Chancel of Church of St Laurence \(/101336666-group-of-11-brick-chest-tombs-to-south-of-chancel-of-church-of-st-laurence-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
188. II [Group of 3 Chest Tombs About 5-15 Metres South of Chancel of Church of St Laurence \(/101085372-group-of-3-chest-tombs-about-5-15-metres-south-of-chancel-of-church-of-st-laurence-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
189. II [Group of 3 Chest Tombs, About 50 Metres West of Church of St Laurence \(/101085369-group-of-3-chest-tombs-about-50-metres-west-of-church-of-st-laurence-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
190. II [Group of 4 Cannon and Tideball Post \(/101086097-group-of-4-cannon-and-tideball-post-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
191. II [Group of 4 Chest Tombs About 35 Metres North West of Church of St Laurence \(/101373888-group-of-4-chest-tombs-about-35-metres-north-west-of-church-of-st-laurence-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
192. II [Group of 4 Headstones About 10-15 Metres South West of Church of St Laurence \(/101085361-group-of-4-headstones-about-10-15-metres-south-west-of-church-of-st-laurence-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
193. II [Group of 4 Headstones About 20 Metres North West of Church of St Laurence \(/101049107-group-of-4-headstones-about-20-metres-north-west-of-church-of-st-laurence-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
194. II [Group of 6 Headstones South of Chancel of Church of St Laurence \(/101372282-group-of-6-headstones-south-of-chancel-of-church-of-st-laurence-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
195. II [Group of Chest Tomb and 4 Headstones to Long Family, Within 2 Metres North of Church of St Laurence \(/101051661-group-of-chest-tomb-and-4-headstones-to-long-family-within-2-metres-north-of-church-of-st-laurence-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
196. II [Haine Farmhouse \(/101068554-haine-farmhouse-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT12
197. II [Hanover Cottage vine Cottage \(/101336645-hanover-cottage-vine-cottage-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
198. II\* [Harbour Cross Wall, Sluices, Bollards, Dry Dock, Basin Gates, Wing Wall and Dundee Steps \(/101336324-harbour-cross-wall-sluices-bollards-dry-dock-basin-gates-wing-wall-and-dundee-steps-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
199. II [Headstone to Francis Holman and Anne Grigson About 5 Metres West of Church of St Laurence \(/101085366-headstone-to-francis-holman-and-anne-grigson-about-5-metres-west-of-church-of-st-laurence-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
200. II [Headstone to George Cock About 1 Metre North of North Chapel of Church of St Laurence \(/101085362-headstone-to-george-cock-about-1-metre-north-of-north-chapel-of-church-of-st-laurence-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
201. II [Headstone to Hephzibah and Alfred Pite, at 384 661, About 200 Metres North East of Cemetery Chapel \(/101336639-headstone-to-hephzibah-and-alfred-pite-at-384-661-about-200-metres-north-east-of-cemetery-chapel-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
202. II [Headstone with Barrel Tomb and Headstone About 10 Metres South West of Church of St Laurence \(/101372262-headstone-with-barrel-tomb-and-headstone-about-10-metres-south-west-of-church-of-st-laurence-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
203. II [Headstone Fixed to Churchyard Wall About 25 Metres South of Church of St Laurence \(/101336665-headstone-fixed-to-churchyard-wall-about-25-metres-south-of-church-of-st-laurence-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
204. II [Honeysuckle Inn \(/101336667-honeysuckle-inn-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
205. II [Hotel St Placids and Railed Area \(/101203534-hotel-st-placids-and-railed-area-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
206. II [Inner Basin Walls, Bollards, Slipway and Steps \(/101031843-inner-basin-walls-bollards-slipway-and-steps-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11

207. II [Jacob's Ladder \(/101031336-jacobs-ladder-ramsgate\)](#)[MENU](#)


Ramsgate, Thanet, Kent, CT11

208. II [K6 Telephone Kiosk \(/101085328-k6-telephone-kiosk-ramsgate\)](#)


Ramsgate, Thanet, Kent, CT11

209. II [K6 Telephone Kiosk \(/101390736-k6-telephone-kiosk-ramsgate\)](#) 

Ramsgate, Thanet, Kent, CT11

210. II [Lift from Western Undercliff to Royal Esplanade at Tr 3763 6422 \(/101281487-lift-from-western-undercliff-to-royal-esplanade-at-tr-3763-6422-ramsgate\)](#) 

Ramsgate, Thanet, Kent, CT11

211. II [Lighthouse on West Pier \(/101086089-lighthouse-on-west-pier-ramsgate\)](#) 

Ramsgate, Thanet, Kent, CT11

212. II [Liverpool House liverpool Villa nos 34 and 35 and Railings \(/101367450-liverpool-house-liverpool-villanos-34-and-35-and-railings-ramsgate\)](#)

Ramsgate, Thanet, Kent, CT11

213. II [Lloyds Bank \(/101086083-lloyds-bank-ramsgate\)](#)

Ramsgate, Thanet, Kent, CT11

214. II [Lower Lodge \(/101336658-lower-lodge-ramsgate\)](#)

Ramsgate, Thanet, Kent, CT11

215. II\* [Mausoleum of Sir Moses and Lady Judith Montefiore \(/101085375-mausoleum-of-sir-moses-and-lady-judith-montefiore-ramsgate\)](#)


Ramsgate, Thanet, Kent, CT11

216. II [Mausoleum to Earl of Dunmow with 2 Tomb Chests and Headstone About 100 Metres West of Church of St L \(/101372893-mausoleum-to-earl-of-dunmow-with-2-tomb-chests-and-headstone-about-100-metres-west-of-church-of-st-laurence-ramsgate\)](#)

Ramsgate, Thanet, Kent, CT11

217. II [Memorial Bust and Railings to Ew Pugin, About 50 Metres South of the Granville Hotel \(/101336316-memorial-bust-and-railings-to-ew-pugin-about-50-metres-south-of-the-granville-hotel-ramsgate\)](#)


Ramsgate, Thanet, Kent, CT11

218. II [Memorial to the Great War \(/101085348-memorial-to-the-great-war-ramsgate\)](#) 

Ramsgate, Thanet, Kent, CT11

219. II [Monument to Woodward Family About 75 Metres North of Cemetery Chapel, with Plot Wall \(/101085395-monument-to-woodward-family-about-75-metres-north-of-cemetery-chapel-with-plot-wall-ramsgate\)](#)

Ramsgate, Thanet, Kent, CT11

220. II [National Westminster Bank \(/101336670-national-westminster-bank-ramsgate\)](#) 

Ramsgate, Thanet, Kent, CT11

221. II [No 1 \(Chancery House\) and No 5, Effingham Street \(/101336644-no-1-chancery-house-and-no-5-effingham-street-ramsgate\)](#)

Ramsgate, Thanet, Kent, CT11

222. II [No 1 and Railed Area \(/101085316-no-1-and-railed-area-ramsgate\)](#)

Ramsgate, Thanet, Kent, CT11

223. II [No 1 and Railed Area \(/101085350-no-1-and-railed-area-ramsgate\)](#)

Ramsgate, Thanet, Kent, CT11

224. II [No 1 and Railed Area \(/101085401-no-1-and-railed-area-ramsgate\)](#)

Ramsgate, Thanet, Kent, CT11

225. II [No 1 and Railed Area \(/101086081-no-1-and-railed-area-ramsgate\)](#)

Ramsgate, Thanet, Kent, CT11

226. II [No 1 with Railed Area \(/101099168-no-1-with-railed-area-ramsgate\)](#)

Ramsgate, Thanet, Kent, CT11

227. II [No 10 and Railed Area \(/101085320-no-10-and-railed-area-ramsgate\)](#)

Ramsgate, Thanet, Kent, CT11

228. II [No 10 and Railed Area \(/101315889-no-10-and-railed-area-ramsgate\)](#)

Ramsgate, Thanet, Kent, CT11

229. II [No 10 with Railed Area \(/101336652-no-10-with-railed-area-ramsgate\)](#)

Ramsgate, Thanet, Kent, CT11

230. II [No 11 and Railed Area \(/101085321-no-11-and-railed-area-ramsgate\)](#)

Ramsgate, Thanet, Kent, CT11

231. II [No 11 with Railed Area \(/101085420-no-11-with-railed-area-ramsgate\)](#)

Ramsgate, Thanet, Kent, CT11

232. II [No 12 and Railed Area \(/101045927-no-12-and-railed-area-ramsgate\)](#)

Ramsgate, Thanet, Kent, CT11

233. II [No 12 with Railed Area \(/101085407-no-12-with-railed-area-ramsgate\)](#)

Ramsgate, Thanet, Kent, CT11

234. II [No 126 and Railed Forecourt \(/101085357-no-126-and-railed-forecourt-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
235. II [No 127 and Walled Forecourt \(/101068848-no-127-and-walled-forecourt-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
236. II [No 13 and Railed Area \(/101336657-no-13-and-railed-area-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
237. II [No 14 and Area \(/101085428-no-14-and-area-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
238. II [No 14 and Railed Area \(/101045892-no-14-and-railed-area-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
239. II [No 14 and Railed Area \(/101054838-no-14-and-railed-area-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
240. II [No 15 and Railed Area \(/101085322-no-15-and-railed-area-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
241. II [No 15 and Railed Area \(/101085354-no-15-and-railed-area-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
242. II [No 154 and Forecourt \(/101336638-no-154-and-forecourt-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
243. II [No 16 and Railed Area \(/101370023-no-16-and-railed-area-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
244. II [No 17 and Railed Area \(/101085355-no-17-and-railed-area-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
245. II [No 18 and Railed Area \(/101045908-no-18-and-railed-area-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
246. II [No 19, Wall and Rear Courtyard \(/101085388-no-19-wall-and-rear-courtyard-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
247. II [No 2 and Railed Area \(/101040032-no-2-and-railed-area-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
248. II [No 2 and Railed Area \(/101336653-no-2-and-railed-area-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
249. II [No 2 and Railed Area \(/101336678-no-2-and-railed-area-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
250. II [No 20 and Railed Area \(/101336341-no-20-and-railed-area-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
251. II [No 22 and Railed Area \(/101099103-no-22-and-railed-area-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
252. II [No 28 and Yard Wall \(/101085435-no-28-and-yard-wall-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
253. II [No 3 and Railed Area \(/101068734-no-3-and-railed-area-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
254. II [No 3 and Railed Area \(/101085317-no-3-and-railed-area-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
255. II [No 3 and Railed Area \(/101336693-no-3-and-railed-area-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
256. II [No 3 with Railed Area \(/101099157-no-3-with-railed-area-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
257. II [No 3 with Railed Area \(/101101781-no-3-with-railed-area-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
258. II [No 34 with Area \(/101085405-no-34-with-area-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
259. II [No 4 and Railed Area \(/101040040-no-4-and-railed-area-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
260. II [No 4 and Railed Area \(/101085318-no-4-and-railed-area-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
261. II [No 4 and Railed Area \(/101086076-no-4-and-railed-area-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
262. II [No 4 with Railed Area \(/101085422-no-4-with-railed-area-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
263. II [No 5 and Railed Area \(/101085351-no-5-and-railed-area-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11

264. II [No 5 and Railed Area \(/101336679-no-5-and-railed-area-ramsgate\)](#)  
 Ramsgate, Thanet, Kent, CT11
265. II [No 5 with Railed Area \(/101099153-no-5-with-railed-area-ramsgate\)](#)  
 Ramsgate, Thanet, Kent, CT11
266. II [No 50 and Railed Forecourt \(/101111800-no-50-and-railed-forecourt-ramsgate\)](#)  
 Ramsgate, Thanet, Kent, CT11
267. II [No 52 and Railed Area \(/101366653-no-52-and-railed-area-ramsgate\)](#)  
 Ramsgate, Thanet, Kent, CT11
268. II [No 52 and Railed Forecourt \(/101086063-no-52-and-railed-forecourt-ramsgate\)](#)  
 Ramsgate, Thanet, Kent, CT11
269. II [No 55 and Railed Area \(/101055785-no-55-and-railed-area-ramsgate\)](#)  
 Ramsgate, Thanet, Kent, CT11
270. II [No 57 and Railed Area \(/101336684-no-57-and-railed-area-ramsgate\)](#)  
 Ramsgate, Thanet, Kent, CT11
271. II [No 6 and Railed Area \(/101040007-no-6-and-railed-area-ramsgate\)](#)  
 Ramsgate, Thanet, Kent, CT11
272. II [No 6 and Railed Area \(/101101783-no-6-and-railed-area-ramsgate\)](#)  
 Ramsgate, Thanet, Kent, CT11
273. II [No 6 and Railed Area \(/101149359-no-6-and-railed-area-ramsgate\)](#)  
 Ramsgate, Thanet, Kent, CT11
274. II [No 6 with Area \(/101068681-no-6-with-area-ramsgate\)](#)  
 Ramsgate, Thanet, Kent, CT11
275. II [No 6 with Courtyard Wall and Garage/Outhouse \(/101086052-no-6-with-courtyard-wall-and-garageouthouse-ramsgate\)](#)  
 Ramsgate, Thanet, Kent, CT11
276. II [No 6 with Railed Area \(/101085421-no-6-with-railed-area-ramsgate\)](#)  
 Ramsgate, Thanet, Kent, CT11
277. II [No 60 and Railed Area \(/101336321-no-60-and-railed-area-ramsgate\)](#)  
 Ramsgate, Thanet, Kent, CT11
278. II [No 64 and Railed Area \(/101356144-no-64-and-railed-area-ramsgate\)](#)  
 Ramsgate, Thanet, Kent, CT11
279. II [No 66 and Railed Area \(/101336322-no-66-and-railed-area-ramsgate\)](#)  
 Ramsgate, Thanet, Kent, CT11
280. II [No 67 and Railed Area \(/101336685-no-67-and-railed-area-ramsgate\)](#)  
 Ramsgate, Thanet, Kent, CT11
281. II [No 69 and Railed Area \(/101366621-no-69-and-railed-area-ramsgate\)](#)  
 Ramsgate, Thanet, Kent, CT11
282. II [No 7 and Railed Area \(/101085319-no-7-and-railed-area-ramsgate\)](#)  
 Ramsgate, Thanet, Kent, CT11
283. II [No 7 and Railed Area \(/101085352-no-7-and-railed-area-ramsgate\)](#)  
 Ramsgate, Thanet, Kent, CT11
284. II [No 71 and Railed Area \(/101085452-no-71-and-railed-area-ramsgate\)](#)  
 Ramsgate, Thanet, Kent, CT11
285. II [No 72 with Railed Area \(/101085386-no-72-with-railed-area-ramsgate\)](#)  
 Ramsgate, Thanet, Kent, CT11
286. II [No 73 and Railed Area \(/101186863-no-73-and-railed-area-ramsgate\)](#)  
 Ramsgate, Thanet, Kent, CT11
287. II [No 8 and Railed Area \(/101040020-no-8-and-railed-area-ramsgate\)](#)  
 Ramsgate, Thanet, Kent, CT11
288. II [No 8 and Railed Area \(/101336680-no-8-and-railed-area-ramsgate\)](#)  
 Ramsgate, Thanet, Kent, CT11
289. II [No 81 and Railed Forecourt \(/101366651-no-81-and-railed-forecourt-ramsgate\)](#)  
 Ramsgate, Thanet, Kent, CT11
290. II [No 9 and Railed Area \(/101336656-no-9-and-railed-area-ramsgate\)](#)  
 Ramsgate, Thanet, Kent, CT11
291. II [Nos 1 and 2 and Wall \(/101336688-nos-1-and-2-and-wall-ramsgate\)](#)   
 Ramsgate, Thanet, Kent, CT11
292. II [Nos 1 to 19 Inclusive, with Railed Areas \(/101085414-nos-1-to-19-inclusive-with-railed-areas-ramsgate\)](#)  
 Ramsgate, Thanet, Kent, CT11
293. II [Nos 1 to 5 Inclusive with Railed Areas \(/101085402-nos-1-to-5-inclusive-with-railed-areas-ramsgate\)](#)  
 Ramsgate, Thanet, Kent, CT11

294. II [Nos 1 to 5 Inclusive, with Railed Areas \(/101085398-nos-1-to-5-inclusive-with-railed-areas-ramsgate\)](#)

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Ramsgate, Thanet, Kent, CT11

295. II [Nos 1 to 6 with Railed Areas \(/101336668-nos-1-to-6-with-railed-areas-ramsgate\)](#)

Ramsgate, Thanet, Kent, CT11

296. II [Nos 1-19 Inclusive, with Railed Areas \(/101054018-nos-1-19-inclusive-with-railed-areas-ramsgate\)](#)

Ramsgate, Thanet, Kent, CT11

297. II [Nos 1-23 West Cliff Terrace Inclusive, with Terracing to South \(/101055848-nos-1-23-west-cliff-terrace-inclusive-with-terracing-to-south-ramsgate\)](#)

Ramsgate, Thanet, Kent, CT11

298. II [Nos 1-31 with Railed Areas \(/101099136-nos-1-31-with-railed-areas-ramsgate\)](#)

Ramsgate, Thanet, Kent, CT11

299. II [Nos 1-9 Inclusive, with Railed Areas and Gardens \(/101203491-nos-1-9-inclusive-with-railed-areas-and-gardens-ramsgate\)](#)

Ramsgate, Thanet, Kent, CT11

300. II [Nos 10 and 11 and Railed Area \(/101085353-nos-10-and-11-and-railed-area-ramsgate\)](#)

Ramsgate, Thanet, Kent, CT11

301. II [Nos 10 to 14 with Railed Area \(/101052310-nos-10-to-14-with-railed-area-ramsgate\)](#)

Ramsgate, Thanet, Kent, CT11

302. II [Nos 11, 13, 15 and 17 with Railed Areas \(/101025852-nos-11-13-15-and-17-with-railed-areas-ramsgate\)](#)

Ramsgate, Thanet, Kent, CT11

303. II [Nos 12 and 13 and Railings \(/101085448-nos-12-and-13-and-railings-ramsgate\)](#)

Ramsgate, Thanet, Kent, CT11

304. II [Nos 12 to 15 Inclusive, with Railed Areas \(/101336651-nos-12-to-15-inclusive-with-railed-areas-ramsgate\)](#)

Ramsgate, Thanet, Kent, CT11

305. II [Nos 12-22 and Railed Areas \(/101085424-nos-12-22-and-railed-areas-ramsgate\)](#)

Ramsgate, Thanet, Kent, CT11

306. II [Nos 13 and 15 and Railed Area \(/101099118-nos-13-and-15-and-railed-area-ramsgate\)](#)

Ramsgate, Thanet, Kent, CT11

307. II [Nos 13-19 with Railed Area \(/101348703-nos-13-19-with-railed-area-ramsgate\)](#)

Ramsgate, Thanet, Kent, CT11

308. II [Nos 14 and 15 with Railed Areas \(/101085344-nos-14-and-15-with-railed-areas-ramsgate\)](#)

Ramsgate, Thanet, Kent, CT11

309. II [Nos 14 to 29 Inclusive with Railed Areas \(/101086056-nos-14-to-29-inclusive-with-railed-areas-ramsgate\)](#)

Ramsgate, Thanet, Kent, CT11

310. II [Nos 17-22 Inclusive, with Railed Areas \(/101085323-nos-17-22-inclusive-with-railed-areas-ramsgate\)](#)

Ramsgate, Thanet, Kent, CT11

311. II [Nos 18 to 38 with Railed Areas \(/101085447-nos-18-to-38-with-railed-areas-ramsgate\)](#)

Ramsgate, Thanet, Kent, CT11

312. II [Nos 2 and 4 with Areas \(/101085383-nos-2-and-4-with-areas-ramsgate\)](#)

Ramsgate, Thanet, Kent, CT11

313. II [Nos 2-10 with Railed Areas \(/101099170-nos-2-10-with-railed-areas-ramsgate\)](#)


Ramsgate, Thanet, Kent, CT11

314. II [Nos 21 to 33 and Railed Steps \(/101336640-nos-21-to-33-and-railed-steps-ramsgate\)](#)

Ramsgate, Thanet, Kent, CT11

315. II [Nos 23 and 24 with Railed Areas \(/101367105-nos-23-and-24-with-railed-areas-ramsgate\)](#)

Ramsgate, Thanet, Kent, CT11

316. II [Nos 23, 25, 27 and 29 with Railed Areas \(/101085390-nos-23-25-27-and-29-with-railed-areas-ramsgate\)](#) 

Ramsgate, Thanet, Kent, CT11

317. II [Nos 24 and 26 and Railed Areas \(/101336650-nos-24-and-26-and-railed-areas-ramsgate\)](#)

Ramsgate, Thanet, Kent, CT11

318. II [Nos 25 and 27 and Railed Area \(/101068712-nos-25-and-27-and-railed-area-ramsgate\)](#)

Ramsgate, Thanet, Kent, CT11

319. II [Nos 3 and 4 and Railed Areas \(/101281691-nos-3-and-4-and-railed-areas-ramsgate\)](#)

Ramsgate, Thanet, Kent, CT11

320. II [Nos 3, 4 and 5 and Railed Area \(/101086070-nos-3-4-and-5-and-railed-area-ramsgate\)](#)


Ramsgate, Thanet, Kent, CT11


321. II [Nos 3-13 with Railed Areas \(/101336649-nos-3-13-with-railed-areas-ramsgate\)](#)




Ramsgate, Thanet, Kent, CT11

322. II [Nos 30-34 Inclusive with Railed Areas \(/101336348-nos-30-34-inclusive-with-railed-areas-ramsgate\)](#)

Ramsgate, Thanet, Kent, CT11

323. II [Nos 34 and 36 and Railed Forecourt \(/101086062-nos-34-and-36-and-railed-forecourt-ramsgate\)](#)  
 Ramsgate, Thanet, Kent, CT11
324. II [Nos 35, 36 and 37 and Railed Areas \(/101086057-nos-35-36-and-37-and-railed-areas-ramsgate\)](#)  
 Ramsgate, Thanet, Kent, CT11
325. II [Nos 38 and 39 and Railed Areas \(/101086058-nos-38-and-39-and-railed-areas-ramsgate\)](#)  
 Ramsgate, Thanet, Kent, CT11
326. II [Nos 38 and 40 with Railed Areas \(/101068750-nos-38-and-40-with-railed-areas-ramsgate\)](#)   
 Ramsgate, Thanet, Kent, CT11
327. II [Nos 38, 40, 42 and 44 and Railed Areas \(/101085427-nos-38-40-42-and-44-and-railed-areas-ramsgate\)](#)  
 Ramsgate, Thanet, Kent, CT11
328. II [Nos 4-44 with Railed Areas \(/101025310-nos-4-44-with-railed-areas-ramsgate\)](#)  
 Ramsgate, Thanet, Kent, CT11
329. II [Nos 46, 48 and 50 and Railed Areas \(/101099133-nos-46-48-and-50-and-railed-areas-ramsgate\)](#)  
 Ramsgate, Thanet, Kent, CT11
330. II [Nos 49 and 51 with Railed Areas \(/101055817-nos-49-and-51-with-railed-areas-ramsgate\)](#)  
 Ramsgate, Thanet, Kent, CT11
331. II [Nos 5 and 6 with Railed Areas \(/101086096-nos-5-and-6-with-railed-areas-ramsgate\)](#)  
 Ramsgate, Thanet, Kent, CT11
332. II [Nos 5 to 17 and Railed Areas \(/101336643-nos-5-to-17-and-railed-areas-ramsgate\)](#)  
 Ramsgate, Thanet, Kent, CT11
333. II [Nos 5, 7 and 9 Including Railed Areas and Gardens \(/101086092-nos-5-7-and-9-including-railed-areas-and-gardens-ramsgate\)](#)  
 Ramsgate, Thanet, Kent, CT11
334. II [Nos 56 and 58 and Railed Areas \(/101085384-nos-56-and-58-and-railed-areas-ramsgate\)](#)  
 Ramsgate, Thanet, Kent, CT11
335. II [Nos 60 and 62 with Railed Area \(/101085385-nos-60-and-62-with-railed-area-ramsgate\)](#)  
 Ramsgate, Thanet, Kent, CT11
336. II [Nos 63 and 65 and Railed Areas \(/101055778-nos-63-and-65-and-railed-areas-ramsgate\)](#)  
 Ramsgate, Thanet, Kent, CT11
337. II [Nos 68 and 70 and Railed Areas \(/101086080-nos-68-and-70-and-railed-areas-ramsgate\)](#)  
 Ramsgate, Thanet, Kent, CT11
338. II [Nos 7, 9 and 11 Railed Areas \(/101085425-nos-7-9-and-11-railed-areas-ramsgate\)](#)  
 Ramsgate, Thanet, Kent, CT11
339. II [Nos 71 to 77 and Railed Areas \(/101085333-nos-71-to-77-and-railed-areas-ramsgate\)](#)  
 Ramsgate, Thanet, Kent, CT11
340. II [Nos 75 and 77 with Railed Areas \(/101336629-nos-75-and-77-with-railed-areas-ramsgate\)](#)  
 Ramsgate, Thanet, Kent, CT11
341. II [Oddfellows Hall \(/101085356-oddfellows-hall-ramsgate\)](#)  
 Ramsgate, Thanet, Kent, CT11
342. II [Office Block, Retaining Walls at Flour Mills \(/101085349-office-block-retaining-walls-at-flour-mills-ramsgate\)](#)  
 Ramsgate, Thanet, Kent, CT11
343. II [Ozengell Grange \(/101085377-ozengell-grange-ramsgate\)](#)  
 Ramsgate, Thanet, Kent, CT12
344. II [Pair of K6 Telephone Kiosks \(/101336671-pair-of-k6-telephone-kiosks-ramsgate\)](#)  
 Ramsgate, Thanet, Kent, CT11
345. II [Pair of Stone Lions About 100 Metres South West of St Clu Hotel \(/101281639-pair-of-stone-lions-about-100-metres-south-west-of-st-clu-hotel-ramsgate\)](#)  
 Ramsgate, Thanet, Kent, CT11
346. II [Pegwell Inn \(/101055833-pegwell-inn-ramsgate\)](#)  
 Ramsgate, Thanet, Kent, CT11
347. II [Pegwell Lodge \(/101366578-pegwell-lodge-ramsgate\)](#)  
 Ramsgate, Thanet, Kent, CT11
348. II [Pegwell Village Hotel \(/101336683-pegwell-village-hotel-ramsgate\)](#)  
 Ramsgate, Thanet, Kent, CT11
349. II [Penistone House \(/101085360-penistone-house-ramsgate\)](#)  
 Ramsgate, Thanet, Kent, CT11
350. II [Pines Lodge \(/101085406-pines-lodge-ramsgate\)](#)  
 Ramsgate, Thanet, Kent, CT11
351. II [Powder Magazine and Walls at South West End of Cross Wall \(/101376681-powder-magazine-and-walls-at-south-west-end-of-cross-wall-ramsgate\)](#)  
 Ramsgate, Thanet, Kent, CT11

352. II [Prayer Hall and Section of Attached Cemetery Wall to Ramsgate Jewish Cemetery \(/101392476-prayer-hall-and-section-of-attached-cemetery-wall-to-ramsgate-jewish-cemetery-ramsgate\)](#) MENU  
Ramsgate, Thanet, Kent, CT11
353. II [Priory House \(/101086048-priory-house-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
354. II [Queen Charlotte Public House \(/101299002-queen-charlotte-public-house-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
355. II [Railed Chest Tomb and 2 Wall Plaques About 25 Metres North East of Church of St Laurence \(/101085363-railed-chest-tomb-and-2-wall-plaques-about-25-metres-north-east-of-church-of-st-laurence-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
356. II [Railed Monument to Dick Family and Adjacent Railed Chest Tomb About 100 Metres South West of Church \(/101085370-railed-monument-to-dick-family-and-adjacent-railed-chest-tomb-about-100-metres-south-west-of-church-of-st-laurence-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
357. II [Railed Tomb and Headstone About 40 Metres North of Church of St Laurence \(/101373848-railed-tomb-and-headstone-about-40-metres-north-of-church-of-st-laurence-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
358. II [Railed Tomb Chest to John Proctor Andendon, About 60 Metres West of Church of St Laurence \(/101051051-railed-tomb-chest-to-john-proctor-andendon-about-60-metres-west-of-church-of-st-laurence-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
359. II [Railings and Gate About 10 Metres North of Ramsgate Library \(/101336648-railings-and-gate-about-10-metres-north-of-ramsgate-library-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
360. II [Railings and Wall About 20 Metres West of Chancery House \(/101347785-railings-and-wall-about-20-metres-west-of-chancery-house-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
361. II [Ramsgate General Hospital, Main Buildings \(/101262019-ramsgate-general-hospital-main-buildings-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
362. II [Ramsgate Library \(/101357573-ramsgate-library-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
363. II [Ramsgate Station \(British Rail\) \(/101086060-ramsgate-station-british-rail-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
364. II [Rank Hovis Flour Mills \(/101298860-rank-hovis-flour-mills-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
365. II [Rochester Lodge \(/101372626-rochester-lodge-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
366. II [Rock Garden About 30 Metres East of Sunshelter \(/101086074-rock-garden-about-30-metres-east-of-sunshelter-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
367. II [Rock Gardens and Cascade \(/101336691-rock-gardens-and-cascade-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
368. II [Rock Gardens and Cliff Stairs About 30 Metres South of Sunshelter \(/101336319-rock-gardens-and-cliff-stairs-about-30-metres-south-of-sunshelter-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
369. II [Rose of England \(/101085391-rose-of-england-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
370. II [Royal Oak Hotel royal Oak Shades \(/101085379-royal-oak-hotelroyal-oak-shades-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
371. II [Royal Sailors Rest \(/101085378-royal-sailors-rest-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
372. II [Royal Victoria Pavillion \(/101336672-royal-victoria-pavillion-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
373. II [Royal Villa \(/101086065-royal-villa-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
374. II [Sailors' Church and Former Sailors' Home \(/101086091-sailors-church-and-former-sailors-home-ramsgate\)](#)   
Ramsgate, Thanet, Kent, CT11
375. II [Shed About 100 Metres South of Barn at Rose Farm \(/101085376-shed-about-100-metres-south-of-barn-at-rose-farm-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT12
376. II [St Augustine's Abbey with perimeter wall \(/101281732-st-augustines-abbey-with-perimeter-wall-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
377. II [St Benet's \(/101336330-st-benets-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11


378. I [St Edwards \(/101086095-st-edwards-ramsgate\)](#)  
 Ramsgate, Thanet, Kent, CT11 [MENU](#)
379. II [St George's Hall star Snooker Centre \(/101085410-st-georges-hallstar-snooker-centre-ramsgate\)](#)  
 Ramsgate, Thanet, Kent, CT11
380. II [St Lawrence House \(/101084360-st-lawrence-house-ramsgate\)](#)  
 Ramsgate, Thanet, Kent, CT11
381. II [St Mildred's \(/101086046-st-mildreds-ramsgate\)](#)  
 Ramsgate, Thanet, Kent, CT11
382. II [Stable and Coachhouse About 20 Metres North East of No 20 \(/101086067-stable-and-coachhouse-about-20-metres-north-east-of-no-20-ramsgate\)](#)  
 Ramsgate, Thanet, Kent, CT11
383. II [Stable Block to North of East Court \(/101203575-stable-block-to-north-of-east-court-ramsgate\)](#)  
 Ramsgate, Thanet, Kent, CT11
384. II [Sun Shelter and Rock Gardens, Winterstoke Gardens \(/101336318-sun-shelter-and-rock-gardens-winterstoke-gardens-ramsgate\)](#) 
385. II\* [Synagogue and Adjacent Outbuilding \(/101051632-synagogue-and-adjacent-outbuilding-ramsgate\)](#)  
 Ramsgate, Thanet, Kent, CT11
386. II [Tancrey House \(/101086068-tancrey-house-ramsgate\)](#)  
 Ramsgate, Thanet, Kent, CT11
387. II [Terracing, Arcading and Balustrades to Royal Parade \(/101336326-terracing-arcading-and-balustrades-to-royal-parade-ramsgate\)](#)  
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388. II [The Admiral Fox \(/101336646-the-admiral-fox-ramsgate\)](#) 
389. II [The Artillery Arms \(/101336327-the-artillery-arms-ramsgate\)](#) 
390. II [The Belle Vue Tavern and Attached Block \(/101085329-the-belle-vue-tavern-and-attached-block-ramsgate\)](#)  
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391. II [The Camden Arms \(/101054011-the-camden-arms-ramsgate\)](#)  
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392. II [The Castle Hotel \(/101085380-the-castle-hotel-ramsgate\)](#)  
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393. II\* [The Clock House \(/101336325-the-clock-house-ramsgate\)](#)  
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394. II [The Cottage \(/101068876-the-cottage-ramsgate\)](#)  
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395. II [The Cottage \(/101085411-the-cottage-ramsgate\)](#)  
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396. II [The Crown Hotel \(/101203931-the-crown-hotel-ramsgate\)](#)  
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397. II [The Deal Cutter \(/101085342-the-deal-cutter-ramsgate\)](#) 
398. II [The Eagle Inn \(/101068870-the-eagle-inn-ramsgate\)](#) 
399. II [The Falstaff \(/101336627-the-falstaff-ramsgate\)](#)  
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400. I [The Grange \(/101203285-the-grange-ramsgate\)](#)  
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401. II [The Hermitage \(/101086064-the-hermitage-ramsgate\)](#)  
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402. II [The Iron Duke and Railed Area \(/101349101-the-iron-duke-and-railed-area-ramsgate\)](#)  
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403. II [The Lazarus Hart Havens of Rest \(/101086061-the-lazarus-hart-havens-of-rest-ramsgate\)](#) 
404. II [The Lido Boating Pond and Retaining Walls \(/101057651-the-lido-boating-pond-and-retaining-walls-ramsgate\)](#)  
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405. II [The Lido, Eastern Quadrant \(/101336323-the-lido-eastern-quadrant-ramsgate\)](#)  
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406. II [The Lido, Western Quadrant \(/101038939-the-lido-western-quadrant-ramsgate\)](#)  
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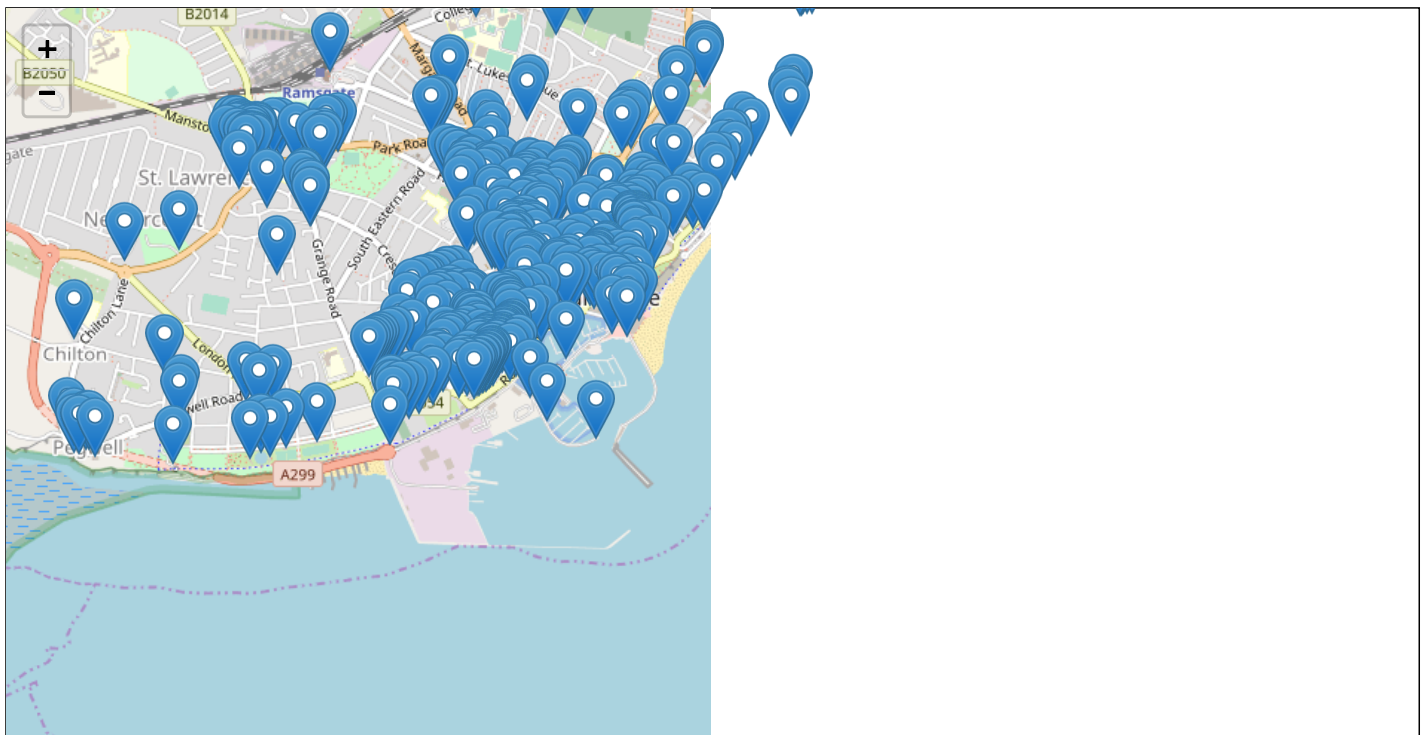


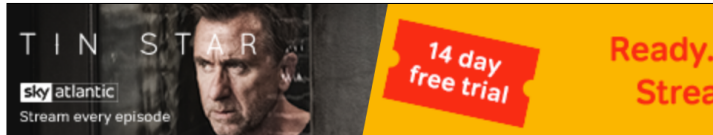
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409. II [The Obelisk \(/101086090-the-obelisk-ramsgate\)](#)  
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410. II [The Old Coach House \(/101086082-the-old-coach-house-ramsgate\)](#)  
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411. II\* [The Old House and Walled Forecourt \(/101085392-the-old-house-and-walled-forecourt-ramsgate\)](#)  
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412. II [The Perseverance Dining Room \(/101281459-the-perseverance-dining-room-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
413. II [The Queen's Head \(/101085381-the-queens-head-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
414. II [The Red Lion \(/101085339-the-red-lion-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
415. II [The Regency Hotel \(/101086093-the-regency-hotel-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
416. II [The Rising Sun \(/101083595-the-rising-sun-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
417. II [The Sylvan Hotel \(/101085393-the-sylvan-hotel-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
418. II [The West Pier, Bollards, Iron Crane and Fairleads \(/101038294-the-west-pier-bollards-iron-crane-and-fairleads-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
419. II [Three Headstones About 10 Metres North of North Aisle of Church of St Laurence \(/101085365-three-headstones-about-10-metres-north-of-north-aisle-of-church-of-st-laurence-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
420. II [Tomb Chest to Captain John Curling and Group of 6 Headstones About 15-20 Metres East of Mausoleum \(/101336664-tomb-chest-to-captain-john-curling-and-group-of-6-headstones-about-15-20-metres-east-of-mausoleum-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
421. II [Tomb Chest to Caroline Gibson About 40 Metres North of Church of St George \(/101100337-tomb-chest-to-caroline-gibson-about-40-metres-north-of-church-of-st-george-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
422. II [Tomb Chest to Elizabeth Biggs and Thomas Grundy About 30 Metres North of Church of St George \(/101336617-tomb-chest-to-elizabeth-biggs-and-thomas-grundy-about-30-metres-north-of-church-of-st-george-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
423. II [Tomb Chest to Francis Lemm, About 5 Metres North West of Church of St George \(/101348692-tomb-chest-to-francis-lemm-about-5-metres-north-west-of-church-of-st-george-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
424. II [Tomb Chest to Janet Mcleod About 42 Metres North of Church of St George \(/101085431-tomb-chest-to-janet-mcleod-about-42-metres-north-of-church-of-st-george-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
425. II [Tomb Chest to Kent Family, About 25 Metres East of Church of St George \(/101100343-tomb-chest-to-kent-family-about-25-metres-east-of-church-of-st-george-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
426. II [Tomb Chest to William Blackman About 20 Metres North West of Church of St George \(/101336655-tomb-chest-to-william-blackman-about-20-metres-north-west-of-church-of-st-george-ramsgate\)](#)  
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427. II [Torrington Villa \(/101086049-torrington-villa-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
428. II\* [Townley House Mansion \(/101336642-townley-house-mansion-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
429. II [Triple Barrel Tomb and Headstone, About 1 Metre North of North Aisle of Church of St Laurence \(/101051675-triple-barrel-tomb-and-headstone-about-1-metre-north-of-north-aisle-of-church-of-st-laurence-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
430. II [Two Chest Tombs About 10 and 25 Metres South of Church of St Laurence \(/101052341-two-chest-tombs-about-10-and-25-metres-south-of-church-of-st-laurence-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
431. II [Two Free Standing Wall Monuments and Headstone with Barrel Tomb, About 45 Metres North West of Church of St Laurence \(/101051093-two-free-standing-wall-monuments-and-headstone-with-barrel-tomb-about-45-metres-north-west-of-church-of-st-laurence-ramsgate\)](#)

Ramsgate, Thanet, Kent, CT11

[MENU](#)

- 432. II [Two Headstones About 10 Metres North East of Church of St Laurence \(/101076958-two-headstones-about-10-metres-north-east-of-church-of-st-laurence-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
- 433. II [Upper Lodge \(/101045840-upper-lodge-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
- 434. II [Vale House \(/101203863-vale-house-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
- 435. II [Vale Place and Railed Areas \(/101336344-vale-place-and-railed-areas-ramsgate\)](#)   
Ramsgate, Thanet, Kent, CT11
- 436. II [Wall and Gate Piers to North and East of West Cliff Terrace \(/101336682-wall-and-gate-piers-to-north-and-east-of-west-cliff-terrace-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
- 437. II [Walls and Gateways Surrounding Nos 136a and B \(/101085412-walls-and-gateways-surrounding-nos-136a-and-b-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
- 438. II [War memorial at St George's Church, Ramsgate \(/101432603-war-memorial-at-st-georges-church-ramsgate-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
- 439. II [Water Tower and Adjacent Range to North West, About 50 Metres East of Cannon Brewery Buildings \(/101336618-water-tower-and-adjacent-range-to-north-west-about-50-metres-east-of-cannon-brewery-buildings-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
- 440. II [Water Tower of Ramsgate Water Works Including Area Railings, Gate Piers to West \(/101203415-water-tower-of-ramsgate-water-works-including-area-railings-gate-piers-to-west-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
- 441. II [West Cliff Lodge \(/101203233-west-cliff-lodge-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
- 442. II [White Cliffs and Adjacent Walls and Outbuildings North of West Cliff Lodge \(/101086094-white-cliffs-and-adjacent-walls-and-outbuildings-north-of-west-cliff-lodge-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11
- 443. II [Wintons Cottage with Garden Wall \(/101085446-wintons-cottage-with-garden-wall-ramsgate\)](#)  
Ramsgate, Thanet, Kent, CT11





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[Building Search \(/search/\)](/search/)

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[Recently Listed Buildings \(/recently-listed-buildings\)](/recently-listed-buildings/)

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[Wales \(/wales\)](/wales/)

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#### 4. **TRANSPORTATION (reliance on aspirational infrastructure)**

- A. Applicant places dependency on Thanet Parkway Railway Station within its Azimuth Report (**APP-085**)<sup>1</sup> including being written into a map of Thanet<sup>2</sup>. Thanet Parkway Station does **not exist** and has **no committed funding** for delivery. The Kent County Council Thanet Parkway Railway Station Consultation did **not make reference** to the [proposed Manston] airport. This is further highlighted by Sir Roger Gale M.P letter, of response to the consultation, in which he wrote in relation to the future of Manston Airport and how **the consultation fail[ed]** to make reference to [the proposed Manston] airport<sup>3</sup>.
- B. Applicant places dependency on Lower Thames Crossing it is mentioned 15 times in its Azimuth Report (**APP-085**)<sup>4</sup>. Lower Thames Crossing does **not exist** and is scheduled to open at the earliest by 2027. Lower Thames Crossing's ten-week consultation concluded only months ago on 20 December 2018.

#### 5. **TRANSPORTATION (PUBLIC BUS SERVICE)**

- A. Applicant's development would **require re-routing and increases in frequency** of public bus service<sup>5</sup>.
- B. Applicant has used data from 2011 to show public bus routes were historically used by workers as an alternative to car 45% of the

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<sup>1</sup> Azimuth Report Volume IV (**APP-085**) Page 52

<sup>2</sup> *Ibid* Figure 15

<sup>3</sup> Kent County Council (August 2017) *Thanet Parkway Railway Station Public Consultation Report*, Page 29, paragraph 2

<sup>4</sup> Azimuth Report Volume I (**APP-085**) Page 45 (7.3.5), Page 48 (8.02 and 8.0.4), Page 49 (8.1.2), Page 50, (8.2 and 8.2.1) and Azimuth Report Volume II (**APP-085**) Pages II, 32 (4.2.17), 46 (4.4.3), 50 (4.4.19), 62 (5.3.13), 67 (6.1.4) and Azimuth Report Volume III (**APP-085**) Pages II, 14 (2.3.15) and 15 (2.3.16)

<sup>5</sup> 5.2-15 Environmental Statement - Volume 15 - Transport Assessment (Part 1) (**APP-060**) Paragraph 4.6.9

time which has also been fed into Applicant's Environmental Statement<sup>6</sup>.

- C. Applicant has not interrogated public bus routes with numbers of workers greater than 65 employees (in 2014 **only 144 people were employed** at Manston Airport on a mostly part-time basis<sup>7</sup>).
- D. Applicant has not interrogated current public bus usage particularly peak time usage by school children, elderly, visitors to Canterbury for health services, current workers and others to determine whether current bus service coverage can absorb in fact workers from the proposed development without an increase in public bus services.
- E. Members of the Environment and Transport Cabinet Committee met on Thursday (January 17 2019) to discuss **axes some bus routes in Thanet to save £360,000**. The changes will come into effect in April. This decision will have a significant knock on impact to remaining bus routes and capacity.

## 6. TRANSPORTATION (CYCLISTS/ EMERGENCY SERVICES)

- A. Applicant relies on cycle routes<sup>8</sup>; however, also notes that:

*“a large number of collisions have occurred across the extensive study area and period selected”<sup>9</sup>.*

## 7. TRANSPORTATION (PUBLIC ROADS)

- A. Applicant states that significant additional works are required and:

*“a failure to appropriately improve these important highway links could have an impact on the ability of the local road network to*

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<sup>6</sup> 5.2-15 Environmental Statement - Volume 15 - Transport Assessment (Part 1) (APP-060) Paragraph 4.6.9

<sup>7</sup> Kent County Council (March 2015) *Manston Airport under private ownership: The story to date and future prospects* Page 3 Paragraph 1

<sup>8</sup> 5.2-15 Environmental Statement - Volume 15 - Transport Assessment (Part 1) (APP-060) Paragraph 4.9.1

<sup>9</sup> 5.2-15 Environmental Statement - Volume 15 - Transport Assessment (Part 1) (APP-060) Paragraph 4.9.2

*serve the proposed development and could prejudice a future aviation operation<sup>10</sup>.*

- B. Applicant has placed a reliance on the provision of overnight parking provisions for freight haulers and fuel road tankers.

## **8. TRANSPORTATION (NETWORK RAIL)**

- A. Applicant places reliance on Ramsgate station and a train line which serves a large number of school children who commute in to and from for schooling as well as a current and rising high volume of commuters, visitors and tourists.
- B. Applicant places reliance on a shuttle bus to and from Ramsgate Station.

## **9. TRANSPORTATION (CO2 EMISSIONS)**

- A. Applicant is **solely dependent** on freight movement by **road**. As you will be aware each tonne of freight **moved by rail reduces CO2** emissions by 76% compared to road. Applicant's proposal will **increase UK CO2 emissions**, which is contra to Government targets<sup>11</sup>.
- B. Applicant is **solely dependent** on fuel road tankers by road. Applicant is **solely dependent** on passenger and worker movement by road particularly during the nighttime hours.

## **10. HEALTH**

- A. It is highly **unlikely that the sole focus** of the response from Thanet CCG Clinical Chair to the Applicant was *"the need for jobs in Thanet with the importance of socio-economic benefits to health<sup>12</sup>."*

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<sup>10</sup> 5.2-15 Environmental Statement - Volume 15 - Transport Assessment (Part 1) (APP-060) Table 3.2

<sup>11</sup> Department for Transport (July 2017) *Transport Investment Strategy Moving Britain Forward*

<sup>12</sup> 5.2-2 Environmental Statement - Volume 2 - Chapters 11-16 (APP-034) Paragraph 15.3.6

- B. In fact, Applicant **did not contact** Thanet Clinical Commissioning Group (CCG) and they confirmed to me by Freedom of Information Request that:

*“as far as [we] are aware, no NHS Thanet CCG’s Governing Body member [defined as individuals that make up the CCG’s governing body] has had **any correspondence** with RiverOak Strategic Partners [Applicant] or any of their associated companies and/or professional advisors and/or any third party<sup>13</sup>.”*

- B. Andrew Scott-Clark, Director of Public Health Kent County Council has confirmed that:

*“Thanet is diverse with a range of health needs with some of the **most deprived communities in Kent** being resident in the district of Thanet...A number of these will directly affected by [Applicant’s] proposals **particularly Newington and Central Harbour/Eastcliffe** areas of Ramsgate. We know that these populations will **be more adversely affected by issues** such as noise and air pollution than the general population<sup>14</sup>”.*

- C. Environmental noise modifies the function of multiple body organs and systems (Table 3<sup>15</sup>).

**Table 3 – Examples of Auditory and Nonauditory Effects of Noise on Human Health<sup>16</sup>**

<b>Body System</b>	<b>Health Effect</b>
Sensory	Hearing loss and tinnitus

<sup>13</sup> Email dated 11 February 2019 Freedom of Information Request response

<sup>14</sup> Email dated 10 October 2017 from a pack called manston HIA pack through a Freedom of Information Act 2000 request made by third party for email correspondence between the Director of Public Health and Applicant

<sup>15</sup> Sally Lechlitner Lusk, PhD, RN, FAAN, FAAOHN, Marjorie McCullagh, PhD, RN, PHNA-BC, COHN-S, FAAOHN, FAAN, Victoria Vaughan Dickson, PhD, RN, FAHA, FAAN , Jiayun Xu, PhD, RN (2017) *Reduce noise: Improve the Nation’s Health* American Academy of Nursing on Policy, Nurse Outlook 65 (2017) 652-656

<sup>16</sup> *Ibid*

Sleep/rest	Difficulty falling asleep, awakenings, decreased sleep quality, fatigue and headache
Cardiovascular	Hypertension, heart disease, stroke and heart attack
Mental and Emotional	Declines in verbal and non-verbal learning, psychomotor function, response speed, attentiveness, memory, recall, and helpfulness, Increases in cognitive difficulties, distractibility, annoyance, aggression and hyperactivity
Reproductive	Low birth weight and prematurity
Endocrine	Overweight and obesity

- D. The **prevalence of mental health issues is greater in Ramsgate** than in the Thanet area as a whole<sup>17</sup>. As of May this year Ramsgate will **not have experienced** Manston aviation noise for **5 years**. Noise annoyance increases where populations become **newly exposed** to noise<sup>18</sup>. Further, nearly 70% of the Relevant Representations submitted to the Planning Inspectorate cited noise, noise annoyance, noise sensitivity as a significant factor against the proposed development proceeding. It has been found that psychological aspects such as noise annoyance and noise sensitivity play important roles in the association between environmental noise and adverse effects on health<sup>19</sup>.
- E. Applicant's proposal will impact the Indoor Air Quality as well as Outdoor Air Quality. There is a proven correlation between inadequate ventilation and poor Indoor Air Quality in schools and poor pupil performance<sup>20</sup>.

<sup>17</sup> Historic England *Urban Panel Report: Ramsgate 28-29 September 2016* Page 6, Paragraph 6

<sup>18</sup> Dr Charlotte Clark Queen Mary University of London (May 2015) *Aircraft Noise Effects on Health prepared for the Airports Commission* Page 18

<sup>19</sup> Clemence Baudin, Marie Lefevre, Patricia Champelovier, Jacques Lambert, Bernard Laumon and Anne-Sophie Evrad (3 August 2018) *Aircraft Noise and Psychological Ill-Health The Results of a Cross-Sectional Study in France* Page 13 Conclusion Paragraph

<sup>20</sup>



F. These health effects of noise place a **high economic burden** on our society, which is comparable to the economic impact of passive smoking<sup>21</sup>.

H. This high economic burden **will hit Thanet very hard** as confirmed by Andrew Scott-Clark, Director of Public Health Kent County Council:

*“ ...[Thanet’s] local health economy is struggling to deliver sustainable health care services and the organisations that are responsible for delivering these (both commissioning and providing) will need to be consulted...as clearly **both the construction and the operation phase** may have **impact on local health services; services that are currently under significant financial and capacity pressure**”<sup>22</sup>.*

G. Currently, NHS figures show Thanet to be **the fourth worst area in the country** for the number of GPs per patient, with just one doctor for every 2,500 people, which puts **Thanet among the bottom 2% in England**<sup>23</sup>.

H. As of 14 February 2019, it has been announced that from Spring 2021 the **nearest emergency stroke services** to Ramsgate will be William Harvey Hospital in Ashford **over an hour away from Ramsgate**<sup>24</sup>.

I. Cardiovascular disease (which includes all the diseases of the heart and circulation including coronary heart disease, angina, heart attack, congenital heart disease and **stroke**) is one of the

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<sup>21</sup> Basner, M., Babisch, W., Davis, A., Brink, M., Clark, C., Janssen, S., & Stansfeld, S. (2014). *Auditory and non-auditory effects of noise on health*. *Lancet*, 383(9925), 1325-1332.

<sup>22</sup> Email dated 10 October 2017 from a pack called manston HIA pack through a Freedom of Information Act 2000 request made by third party for email correspondence between the Director of Public Health and Applicant

<sup>23</sup>

<sup>24</sup>

**most common adverse health effects** associated with aviation noise.<sup>25</sup>

- J. Given that *'time is brain'* and that urgent intervention can limit cerebral damage and/or death<sup>26</sup> the news of emergency stroke services **moving over an hour away to Ashford will have a significant and adverse impact to** Ramsgate residents life chances and palliative care public health resources.

## 11. PUBLIC OUTDOOR AREAS

- A. Applicant's proposal will impact quiet public outdoor areas for example: parks (Ellington, Warre), squares (Vale, Spencer, Arklow), Lawns (Guildhall, Liverpool), beaches (Ramsgate Main Beach, Eastcliff Beach, Westcliff Beach), promenades (Westcliff and Eastcliff), Pegwell Bay, The Royal Esplanade and conservation areas.
- B. WHO guidelines recommend existing large quiet outdoor areas **are preserved** and the signal-to-noise ratio kept low<sup>27</sup>.
- C. Ellington Park has been awarded £1.64m support from the Heritage Lottery fund **to regenerate and conserve the park**<sup>28</sup>. Ellington Park dates back to 1652 and is under or in very close proximity to the flight swathes and low flying planes of 400-600 feet proposed by the Applicant.
- D. Ramsgate is part of *Pioneering Places* an ambitious project that will make East Kent an even better place to live, work and visit by exploring heritage, developing civic pride and connecting artists and communities. The investment will act as a catalyst for Ramsgate's vibrant and growing cultural scene, bringing with it greater community cohesion,

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<sup>25</sup> [REDACTED]

<sup>26</sup> S Davies, K Lees and G Donnan International Journal of Clinical Practice (2006) *Treating the acute stroke patient as an emergency: current practices and future opportunities* Summary and Conclusions

<sup>27</sup> Dr Charlotte Clark Queen Mary University of London (May 2015) *Aircraft Noise Effects on Health prepared for the Airports Commission* Page 25

<sup>28</sup> [REDACTED]

educational attainment and a positive impact on jobs, health and wellbeing. The focus is a **public artwork** commissioned at a value of £300,000 of the £1, 489,255 funding to be **positioned at the Royal Harbour environs**<sup>29</sup> and is under the flight swathes and low flying planes of 400-600 feet proposed by the Applicant.

- E. Ramsgate received an initial £50,000 funding<sup>30</sup> to rescue Ramsgate's Rock Gardens for work on the Pulhamite rocks on the Madeira Walk fountain and Albion gardens, completed in 1894, and is under the flight swathes and low flying planes of 400-600 feet proposed by the Applicant.
- F. Ramsgate residents currently enjoy **kitesurfing, sailing, kayaking, canoeing, diving, seal boat trips, bird watching, tennis (open air tennis courts are at Spencer Square), swimming, football, croquet, bowls, walking, cycling, golfing, and horse riding** which are under or in near proximity to the proposed flight swathes and low flying planes of 400-600 feet proposed by the Applicant.
- G. Ramsgate will hold the **British Kitesurfing championships** in 2019 (its second year), was voted in the **Top 100 ITV British walks** (2018), **Active Ramsgate** was awarded GOLD in the Community Care Award (2017) and Explore Kent awarded Ramsgate in 2016 **with the first "We Love Walkers and Cyclists"** accreditation status and is part of the **28-mile circular Viking Coastal Trail** (one of the most attractive leisure cycle routes in Kent) which links up with Regional Route 15 of the National Cycle Network which are under or in near proximity to the proposed flight swathes and low flying planes of 400-600 feet proposed by the Applicant.

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- H. It holds the second largest international regatta in the UK from the marina Ramsgate Week and the Regatta, Winter Wassail, May Fayre, Great Bucket and Spade Run, Looping the Loop, Ramsgate Festival of Sound (outside and indoors), Adventures in Performance, Ramsgate Carnival, and the Christmas laser light show which are under or in near proximity to the proposed flight swathes and low flying planes of 400-600 feet proposed by the Applicant.
- I. The area surrounding the town centre has extensive green spaces that provide an important resource for the health (both physical and mental) of Ramsgate’s population and that make it an attractive place to live and visit.
- J. Ramsgate people will lose the full use, enjoyment and potential of these public amenities and events, which contribute to civic pride, mental health and wellbeing. A large majority of which have been initiated after the airport’s closure 5 years ago.

**12. EDUCATIONAL SYSTEM**

- A. There are a large number of OFSTED rated schools, colleges, childminders and nurseries – **38 in total**<sup>31</sup> – that are under or in close proximity to the flight swathes and low flying planes of 400-600 feet proposed by the Applicant.
- B. Most school’s OFSTED rating remained consistent; however, a number of schools **improved their OFSTED rating** since the Airport’s closure in March 2014 (Table 4).

**Table 4: Showing Schools with Improved OFSTED Rating After Airport Closure (March 2014)**

School	Improved OFSTED Rating	Year Awarded
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<sup>31</sup> \_\_\_\_\_

Chilton Primary School <sup>32</sup>	Outstanding	2019
St Laurence in Thanet Church of England Junior Academy <sup>33</sup>	Good	2018
Dame Janet Primary School <sup>34</sup>	Good	2018
Newington Community Primary School <sup>35</sup>	Outstanding	2017
Newlands Primary School <sup>36</sup>	Good	2017
Ellington Infant School <sup>37</sup>	Good	2017

- C. The number of OFSTED rated schools, colleges, childminders and nurseries **increased** since the airport's closure in March 2014 by **14**<sup>38</sup>.
- D. Many studies have found effects of aircraft noise exposure at school or at home on children's reading comprehension or memory skills (Evans & Hygge, 2007). The RANCH study (Road traffic and Aircraft Noise and children's Cognition & Health) of 2844 9-10 year old children from 89 schools around London Heathrow, Amsterdam Schiphol, and Madrid Barajas airports found that aircraft noise was associated with **poorer reading comprehension and poorer recognition memory**, after taking social position and road traffic noise, into account (Stansfeld et al., 2005)<sup>39</sup>.

<sup>32</sup> OFSTED Inspection Report for Chilton Primary School  
[REDACTED]

<sup>33</sup> OFSTED Inspection Report for St Laurence in Thanet Church of England Junior Academy  
[REDACTED]

<sup>34</sup> OFSTED Inspection Report for Dame Janet Primary School  
[REDACTED]

<sup>35</sup> OFSTED Inspection Report for Newington Community Primary  
[REDACTED]

<sup>36</sup> OFSTED Inspection Report for Newlands Primary School  
[REDACTED]

<sup>37</sup> OFSTED Inspection Report for Ellington Infant School  
[REDACTED]

<sup>38</sup> OFSTED rated schools, colleges, childminders and nurseries - URN 2497261 (2018), URN EY548223 (2017), URN EY538994 (2016), URN EY496635 (2016), URN 139255 (Dec 2013), URN EY484144 (Dec 2014), URN EY556233 (2018), URN 80813 (Oct 2014), URN 144785, URN EY562005 (2018), URN EY558445 (2018), URN 142117 (2015), URN EY545910 (2017), URN 139255 (Dec 2013)

<sup>39</sup> Dr Charlotte Clark Queen Mary University of London (May 2015) *Aircraft Noise Effects on Health prepared for the Airports Commission* Page 19

- E. The development of cognitive skills such as reading and memory is important not only in terms of educational achievement **but also for subsequent life chances and adult health** (Kuh & BenShlomo, 2004)<sup>40</sup>.
- F. There are several ways in which aircraft noise could influence children's cognition: lost teaching time - as a teacher may have to stop teaching whilst noise events occur; teacher and pupil frustration; annoyance and stress responses; reduced morale; impaired attention; children might tune out the aircraft noise and over-generalise this response to other sounds in their environment missing out on information; and sleep disturbance from home exposure which might cause performance effects the next day (Stansfeld & Clark, 2015)<sup>41</sup>.

### 13. RAMSGATE TOWN CENTRE

- A. Ramsgate's town centre is a "**living' town centre**" with much charm...*"It has a different, but complementary offer to Margate – more 'up-market', smaller-scale and focused on the sea and interaction with it and on the town centre and its architecture and surrounding green spaces*<sup>42</sup>.
- B. Unlike many other seaside towns Ramsgate is **open and bustling all year round**. Ramsgate has 5 bank branches (NatWest, Lloyds, Halifax, Barclays, HSBC), a post office, greengrocers, butchers, bakers, home-baking stores, haberdashers, cafes, public houses, restaurants, hairdressers, beauty salons, wellbeing practitioners, leisure centre, dentist, chemists, cobblers, clothes and shoe shops, galleries, art shops, book shop, office supplies, gift shops, churches, open market, chandlery, library, a Wilko, Aldi and Waitrose etc.

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<sup>40</sup> Dr Charlotte Clark Queen Mary University of London (May 2015) *Aircraft Noise Effects on Health prepared for the Airports Commission* Page 19

<sup>41</sup> Dr Charlotte Clark Queen Mary University of London (May 2015) *Aircraft Noise Effects on Health prepared for the Airports Commission* Page 20

<sup>42</sup> Historic England *Urban Panel Report: Ramsgate 28-29 September 2016* Page 16, Paragraph 7.1

- C. In short, Ramsgate Town Centre continues to serve its local community very much as a traditional market town centre with a traditional mixture of independent grocery and comparison goods retail alongside cafes, public houses, restaurants and services<sup>43</sup>.
- D. Of the traditional centres within Thanet, **Ramsgate town centre has the largest turnover** at £67 million<sup>44</sup>.
- E. Over twenty (**20**) restaurants, cafes and bars and ten (**10**) retail and creative spaces (a large portion of which have been funded by private inward investment) have **opened since the closure of the airport** in May 2014. This is in sharp contrast to the nationwide trend of high street store closures and online shopping drawing footfall away<sup>45</sup>.
- F. Protecting this traditional town centre mix of uses is **important in ensuring Ramsgate Town Centre continues to contribute to the sustainability of Ramsgate as a residential community**, which is part of its attraction for visitors<sup>46</sup>.
- G. Ramsgate Town **Centre's sustainability is at risk (and by extension the sustainability of Ramsgate as a residential community and visitor attraction)** from Applicant's proposal with flight swathes directly overhead and low flying flights of 400-600 feet.

**14. RAF MANSTON SPITFIRE & HURRICANE MEMORIAL MUSEUM, MANSTON HISTORY MUSEUM and ROYAL AIR FORCE MANSTON MUSEUM HISTORY MUSEUM ASSOCIATION**

- A. RAF Manston Museum Spitfire & Hurricane Memorial Museum is a registered charity with the number 1159597. The objects of the Charity "*are to advance the education of the public by maintaining a museum for the exhibition to the public of World War aircraft and*

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<sup>43</sup> *Ibid* Page 15 Paragraph 2

<sup>44</sup> Arup (August 2018) *Thanet District Council Draft Local Plan to 2031 Sustainability Appraisal – Environmental Report* Page 46, Table 13: Key Sustainability Issues for Thanet

<sup>45</sup> [REDACTED]

<sup>46</sup> Historic England *Urban Panel Report: Ramsgate 28-29 September 2016* Page 15 Paragraph 2

*associated artifacts and memorabilia and to preserve the same in the best possible condition for the public benefit<sup>47</sup>.*

- B. Manston History Museum is a registered charity with the number 11273253<sup>48</sup>. The objects of the charity are to *“advance the education of the public in the sciences, practice and history of aviation relating to Manston Airfield and its aviation connections with Thanet<sup>49</sup>”*.
- C. Royal Air Force Manston History Museum Association is a registered charity with the number 1075396. The objects of the charity are to *“record the history of RAF Manston and its surrounding satellites are RAF Ash, RAF Sandwich and RAF Dunkirk. This is achieved through increasing its collection of artifacts and through maintenance of existing exhibits and providing an insight into the history through its museum and events<sup>50</sup>”*.
- D. RAF Manston Museum Spitfire & Hurricane Memorial Museum, Manston History Museum and Royal Air Force Manston History Museum Association together the ‘Museums’.
- E. Applicant has stated at a recent SMA BBQ of 10 February 2019 in answer to a question from the public that the Museums were not part of the DCO process. Further, Applicant wants the Museums to move but would give very limited financial support (study, design and help **museum to find funding from a public or other source**). This funding would need to extend to insulating and ventilating the Museums due to proximity to the runway. Applicant has **not provided any funding towards museum noise mitigation**.

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- F. RAF Manston Museum Spitfire & Hurricane Memorial Museum owns freehold land worth Freehold land of £505, 282<sup>51</sup>. It is unclear what is happening with this Freehold land, which is an asset of the charity held on trust for public benefit.
- G. Applicant has stated that it will “*ensure that the Museums are advertised in the passenger terminal and will **explore** the possibility of a shuttle bus. However, a shuttle bus operation for non-passengers and the terminal might **raise security issues** and would have to be considered further at a later stage*”<sup>52</sup>.
- H. It is unclear where the perimeter of the airport will be in relation to Museums. Security concerns have escalated within aviation since the airport’s closure and other similar museums for example East Midlands Aeropark have its own entrance and car parking spaces.
- I. Given that the Applicant has stated, “*passenger-only operation is **unlikely to be viable** at Manston Airport*”<sup>53</sup> and that in fact passenger services are dependent on the viability of the cargo freight business this seems a very weak commitment from Applicant to Museums.
- J. Access and accessibility to Museums are also unclear as is revenue stream opportunities (eg car parking for Museums will be owned by Applicant).
- K. Museums location within or close to a dedicated freight airport may hinder footfall and alienate public either by access, security barriers and to those who find the idea of a memorial to heroes within a dedicated freight airport disrespectful.
- L. Museums are at risk of not achieving parts of their stated charitable objectives for public benefit.

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52 6.1 Consultation Report (APP-075) Page 213

53 6.1 Consultation Report (APP-075) Page 213

## 15. PLAN A

Applicant stated within its Summary of Applicant's Oral Submissions at January 2019 Hearing (**TR02002/D1/Sub**<sup>54</sup>) on page 48 at 8.2 that (bold and underline added for emphasis):

*"the applicant has no 'Plan B' to build houses on the site. It has **spent considerable time and effort resisting planning applications and local plan changes that would make non-airport development more likely, and is committed to securing and operating a successful airport from the site***<sup>55</sup>."

### 1. BACKGROUND FROM THE SALE IN MAY 2014 TO JULY 2018

- A. *"Following the sale of the airport by Infratil in 2013 and its closure by new owners Lothian Shelf in May 2014 Thanet District Council made significant efforts to explore its CPO powers to support a functioning aviation use in the site.*
- B. **July 2014** - *Cabinet resolved to carry out a soft-market testing exercise to identify a CPO Indemnity Partner - a third party who could cover the costs of compulsory purchase of the Manston Airport site.*
- C. **December 2014** - *Labour controlled Cabinet decided that no further action be taken at the present time on a CPO of Manston Airport, on the basis that Thanet District Council **has not identified any suitable expressions** of interest that fulfil the requirements of the Council for a CPO indemnity partner and that it does **not have the financial resources** to pursue a CPO in its own right.*
- D. **May 2015** - *Extraordinary Council meeting agreed that to recommend to Cabinet that it reviews its position in relation to the Manston Airport site, taking account of all the surrounding*

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<sup>54</sup> Summary of Applicant's Oral Submissions at January 2019 Hearing (**TR02002/D1/Sub**) at **8.1.2**

<sup>55</sup> *Ibid*

*circumstances relating to an indemnity partner for a possible Compulsory Purchase Order.*

- E. **July 2015** – Cabinet decides to authorise specialist advice to determine whether RiverOak (Riveroak Investment Corporation LLC<sup>56</sup>) are a suitable indemnity partner in relation to a CPO for Manston Airport.
- F. **October 2015** - Cabinet decides to take **no further action** at the present time on a CPO of Manston Airport, on the basis that **RiverOak do not fulfil** the requirements of the Council for an indemnity partner.
- G. **December 2015** - Cabinet decides to undertake a further soft market testing exercise to identify any interest in becoming a CPO indemnity partner in relation to Manston airport.
- H. **April 2016** - The owners of the airport site submitted a planning application in April 2016<sup>57</sup>.
- I. **June 2016** - Cabinet considered the assessment of the responses to the exercise and agreed that in terms of the key lines of enquiry, the market cannot deliver on the council's requirements; there is no established market which is able to deliver, or an adequate number of operators; the market has no capacity to deliver the requirements and there is **no cost or other benefits in taking this matter further**.
- J. Following this the Council sought to understand whether an airport would be a viable operation for the site and whether there would be a reasonable prospect of that occurring within the plan period of the Local Plan (i.e. to 2031) so that it could fully consider the options for the site. The Council also needed robust evidence to inform the Local Plan. Accordingly the Thanet District Council **appointed Avia Solutions** to carry out the study. Stakeholder interviews were afforded to Discovery Park, RiverOak Investment (RSP's first iteration), Sally Dixon, Ryannair, Flybe, Major European LCC,

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<sup>56</sup> [REDACTED]

<sup>57</sup> Thanet District Council (November 2016) *Economic Development in Thanet (Employment Land Update and Economic Needs Assessment)*.

*Network Route Development for Major European LCC, Major UK Carrier, KLM, Cargo Division for Airline Operating Freighters at Stansted, Air Cargo Charter Broker – UK, Ex-DHL, Strategic Aviation Solutions Ltd, and Sir Roger Gale MP<sup>58</sup>.*

- K. **September 2016** - AviaSolutions Report known as Manston Airport Viability Report<sup>59</sup> concluded that:

*“it is **most unlikely that Manston Airport would represent a viable investment opportunity even in the longer term (post 2040), and certainly not during the period of the Local Plan to 2031**”<sup>60</sup>.*

- L. **January 2017** - the draft Local Plan was published for Consultation and known as the Proposed Revision Draft Local (Preferred Option) 2017. SP05- Former Airport Site stated that:

*“Land is allocated for **a mixed use settlement at the site of the former Manston Airport** as defined on the policies map. The site has the capacity to deliver at least 2,500 new dwellings, and up to 85,000sqm employment and leisure floorspace”<sup>61</sup>.*

- M. **17 January 2017** - it is cited in their 18 January 2018 letter that lawyers for Applicant wrote to the Head of Strategic Planning at Thanet District Council in relation to the draft Local Plan.

- N. **August 2017** - Thanet District Council commission **two more reports** one known as Analysis of Manston Airport Report by

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<sup>58</sup> AviaSolutions (September 2016) *Commercial Viability of Manston Airport Avia Solutions FINAL Report for Thanet District Council* Pages 48-55

<sup>59</sup> *Ibid*

<sup>60</sup> *Ibid*

<sup>61</sup> Thanet District Council (2017) *Proposed Revision Draft Local (Preferred Option) SP05*

Azimuth and Northpoint<sup>62</sup> and a further report from AviaSolutions called Local Plan Representations Review<sup>63</sup>.

- O. In this body of work Thanet District Council (TDC) commissioned AviaSolutions to provide support pertaining to TDC's treatment of Manston Airport within the Local Plan, and more specifically, to provide commentary as required with regards to Local Plan Representations (objections) it received through the public from Colin Bandick, Beau Webber, David Stevens, Philip Kruger, Dover District Council, Bob Parsons, John Jeapes and Supporters of Manston Airport<sup>64</sup>.
- P. It is worth pointing out that AviaSolutions has a team of 10 and its clients in the Aviation Sector are: *Abu Dhabi Airports Company, Abu Dhabi International Airport, ACL, ACSA, Aer Arann, Aeroporti di Paris, airBaltic, Aires, Airport Property Partnership, Arlanda, ASIG, Avinor, BAA, Bahrain Airport Company, Belfast International Airport, Bergen Airport, Berlin Airports, Birmingham Airport, Blackpool Airport, BMED, Bristol Airport, British Airways, Brussels Airport Co, CAA RCB Allocation, Cardiff Airport, Changi, CityJet, Copenhagen Airport, Cork Airport, Derry Airport, **East Midlands Airport**, EasyJet, Etihad Airways, Exeter Airport, Flybe, GESAC, **Heathrow Airport Ltd**, Hermes Airports, HIAL, IATA, INECO, Ireland West Airport Knock, ITAKA, Leeds Airport, Liverpool Airport, Loadair, London City Airport, London Gatwick Airport, Luton Borough Council/Ernst & Young, **Manchester Airports Group**, Newcastle Airport, Newquay Airport, Oxford Airport, Peel Airports, Polish Airports, RAF Lyneham, Riga Airport, SASI, SEA, Shannon Airport, Sheffield City Airport, **Southend Airport**, Tees Valley Airport, Virgin Holidays, and VTAE<sup>65</sup>.*

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<sup>62</sup>AviaSolutions (August 2017) *Review of Azimuth & Northpoint Forecast for Manston Airport – Final Report for Thanet District Council* Pages

<sup>63</sup> Thanet District Council (August 2017) *Manston Airport Local Plan Representations – Final report for Thanet District Council*

<sup>64</sup> *Ibid* Pages 5-18

<sup>65</sup> [REDACTED]

- Q. Whereas the report that Applicant is relying on the Azimuth Report (**APP-085**) written by a connected person to the Applicant with no air cargo, logistics or economics experience sole trading as Azimuth Associates<sup>66</sup> from her home address and who seems to have had just one client; the Applicant.
- R. Proposed Revision Draft Local (Preferred Option) 2017 including the **allocation of the former Manston site** to mixed development was to proceed to Thanet District Council on **18 January 2019**.
- S. **18 January 2018** – on the day of the Extraordinary Meeting of the Council lawyers for the Applicant wrote (**BDB now BDB Pitmans**) - *an award winning top 100 law firm*- a **7 page letter to the Chief Executive** of Thanet District Council<sup>67</sup> **copying in all elected members of Thanet District Council as well as the Strategic Planning Manager and Planning Applications Manager**. This letter was also put on Applicant website and supporters of the airport's social media pages. The letter strongly stated that in BDB's legal opinion that:

- (i) *"The draft Local Plan has not been positively prepared;*
- (ii) *it is not justified through adequate and up-to-date evidence;*
- (iii) *there is no evidence available to confirm that it will be effective and deliverable over the Plan period;*
- (iv) *there has not been effective joint working on cross-boundary strategic priorities;*
- (v) *is not consistent with national planning and aviation policy objectives; and*
- (vi) *it has not been prepared in accordance with the Duty to Cooperate or legal and procedural requirements and therefore fails the 'soundness' test. Consequently, the Plan should not be submitted for Examination<sup>68</sup>."*

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<sup>66</sup> [REDACTED]

<sup>67</sup> BDB letter to Chief Executive of Thanet District Council 18 January 2018

<sup>68</sup> *Ibid*

- T. This was reminiscent of a similar sort of campaign by North and South Thanet's MPs, some county councilors and district councilors when the officers of Thanet District Council found back on:

*"11 December 2014 that, in its opinion, RiverOak did **not have the necessary financial capacity** to support the Council's plan for Manston and that **RiverOak's business plan was insufficient**. It was concluded therefore that the Council would not take forward the CPO at this time<sup>69</sup>.*

- U. The campaign resulted in a very public independent review by PwC, on behalf of the Department of Transport, called for by the MPs into the officers of Thanet district Council's decision-making process about the future of Manston Airport<sup>70</sup>. The resulting report merely offered solutions as to how Thanet District Council could have essentially found ways to work around the Due Diligence Protocol if a party had not matched all the criteria.
- V. The Extraordinary Meeting of the Council held on 18 January 2018, resulted in the leader at the time of Thanet's Council, Chris Wells, to step. It, also, resulted in 12 UKIP councilors breaking away and calling themselves the Thanet UKIP leaders. Fourteen UKIP councilors and Henry Bolton, the national party ex-leader called for Mr Wells to go in a row over the former Manston airport site<sup>71</sup>.
- W. **17 July 2018** - the DCO application for Applicant was received by the Planning Inspectorate.
- X. **19 July 2018** – Councilors against the advice of their officers voted 21 to 31 in favour to back a draft Local Plan which Applicant had lobbied for:

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<sup>69</sup> PwC (22 June 2015) *Review of CPO Indemnity Partner Process for Manston Airport* Final Report  
PwC (22 June 2015) *Review of CPO Indemnity Partner Process for Manston Airport* Final Report <sup>70</sup>  
PwC (22 June 2015) *Review of CPO Indemnity Partner Process for Manston Airport* Final Report

<sup>71</sup> Thanet Council's UKIP leader Chris Wells to step down [REDACTED]

*“The airport should remain protected for aviation uses until such time that the Local Plan review and DCO processes have been completed<sup>72</sup>.”*

## 2. PLAN A

- A. Applicant may not necessarily at this moment have a “Plan B’ to build houses on the [Manston] site”. But it does appear to have spent a lot of time and effort to ensure that the site is **protected for aviation uses only for at least 2 years.**
- B. My understanding of the DCO process is that a NSIP DCO would ‘trump’ any planning application so this is not a necessary action as part of the DCO process.
- C. The draft Local Plan without intervention by Applicant would make the Manston site – a mixed-use development land - worth **circa £500m.**
- D. Whereas the draft Local Plan intervention by the Applicant keeps the land as aviation use only for at least 2 years.
- E. This would not affect site value too much unless it can be shown at compulsory acquisition that there is little interest/value in the site as an aviation site.
- F. As Applicant is the only one interested in the land after it has been ‘on the market’ for 5 years with Thanet District Council carrying out soft market testing and multiples reports stating it is not feasible to run a viable airport at the Manston site. It shouldn’t be too hard to do.
- G. Judging by the very low value Applicant has placed on the Manston site land in its Funding Statement it would be reasonable to assume this is perhaps why:

*“the applicant...has **spent considerable time and effort resisting planning applications and local plan changes that would make***

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<sup>72</sup> BDB letter to Chief Executive of Thanet District Council 18 January 2018



*non-airport development more likely, and is committed to securing and operating a successful airport from the site<sup>73</sup>."*

## **16. Ramsgate Environment and Manston's History**

As you walk around Ramsgate you will see much of the architecture and past history of housing in Ramsgate from pre-1750. I have written a whistle stop tour around to demonstrate just how much of it was built before even the thought of an airport. The architecture was laid out with the sea, coast, tranquility and views in mind, which is very much at odds with the Applicant's proposal.

### **Before the port works – pre-1750**

*"The largest **settlement in the area was St Lawrence**. This was the only village in the project area and the only place with ecclesiastical provision, meaning it gave its name to the parish which covered the majority of the project area until the 19th century.*

*Ramsgate appears to have begun as a **satellite settlement of St Lawrence**, providing the inland village with access to fishing and landing through the natural harbour at the only break in the cliff line between Pegwell Bay and Dumpton Gap<sup>74</sup>."*

*"It is also evident that Ramsgate had evolved to become **a locally important harbour by the close of the medieval period as it was taken on as a limb of nearby Cinque Port of Sandwich by the 1480s<sup>75</sup>**."*

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<sup>73</sup> Summary of Applicant's Oral Submissions at January 2019 Hearing (TR02002/D1/Sub) at 8.1.2

<sup>74</sup> Historic England (2018) *Historic Characterisation of Ramsgate* Prepared by LUC and Archangel Heritage Page 14

<sup>75</sup> *Ibid* Page 18

## **Growth of the port and resort – 1750 to c.1850**

*“The harbour works begun in the 1750s were the result of debate over construction of a haven of refuge for shipping on this stretch of the coast.*

*After a somewhat ill-fated start to the design and construction of the harbour, works commenced to the **design of Sir Percy Brett and Captain Desmaretz<sup>3</sup>, made following survey of the harbour in 1755**, and were not completed until well into the following century. They saw the addition of harbour walls and breakwaters, referred to as the East Pier and West Pier, to create inner and outer basins. The western outer breakwaters had lighthouses sited on the end of the West Pier to act as a navigational aid. The harbour improvements were designed and overseen by many of the **early leading lights in civil and marine engineering, including John Smeaton, Samuel Wyatt, John Rennie and Sir John Rennie**, and included many then-innovative methods, including sluicing systems designed to reduce and remove silt from the basins. **The harbour established by these improvements led to Ramsgate developing as a key port on the southeast coast. The works of 1750-1850 still form the essential framework of the town’s old port<sup>76</sup>.***

*“The harbour extension came at a time when the **concept of a seaside resort was developing and the well-to do or well-connected were seeking out seaside towns to undertake sea bathing being extolled for its therapeutic benefits amongst polite society.***

*The expanded harbour, with its capacity for more and larger vessels coupled with relative ease of access from London, and the presence of a **decent stretch of shallow, sandy foreshore** enabled the town to capitalise not just on maritime trade, but also on early resort tourists. **The town began to attract wealthy visitors and resort facilities are documented from at least the 1760.***

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<sup>76</sup> *Ibid* Page 18

**What does survive is the vast expansion of housing that came with the town's growing status as a maritime centre and resort.** This was focused on the **East and West Cliff**, around the routes to **Pegwell and Dumpton**, and comprised both properties for wealthy residents and visitors and for those at the lower end of the social spectrum. The former comprised townhouses whereas the latter comprised terraced housing of varied forms<sup>77</sup>.

*"The townhouses were speculatively-built and laid out in crescents and terraces. These were aimed squarely at wealthy would-be residents and visitors and used the **polite architectural forms and layouts seen in fashionable contemporary spa and resort towns such as Bath and Cheltenham and in the Georgian expansion** of London. Some developments were even of the '**garden square**' form and included private communal ornamental gardens for residents. The townhouses featured extensive use of restrained, classically-influenced styles with frontages in either stucco or brick with stone detailing. Many were sited in **elevated locations overlooking the sea** and with some degree of separation from the main commercial centre of the town. Most were not that far from the town itself but **Westcliff Terrace, a relatively late example of the type built in the 1840s**, was at some distance on a then-isolated site on the Pegwell Road<sup>78</sup>".*

*"In the latter part of the 18th century and early 19th century some small country houses were developed at the fringes of the then built-up area of the town for those who sought a greater degree of seclusion. These were miniature versions of the **country houses and landscaped parks being developed by the landed aristocracy** and comprised ranges of service buildings and facilities such as kitchen gardens alongside the main house and **informal garden areas**. They included developments for incomers, such as **Eastcliff Lodge**, and those for families with some history in the area, such as **Townley House and Townley Lodge – built for the Townley family in the 1790s**. Such houses were the exception within the*

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<sup>77</sup> Ibid Page 19

<sup>78</sup> Ibid Page 20

project area with most of the prosperous families 'making do' with the accommodation provided by townhouses<sup>79</sup>.

*"Indeed, warfare on the continent prevented wealthier individuals undertaking 'The Grand Tour', contributing to a rise in domestic tourism. Owing to the importance of the harbour to military movements and the potential for invasion forces to utilise this stretch of coast, batteries were constructed on the East and West Cliff and at Pegwell<sup>80</sup>".*

*"Whilst military use is an important and defining part of the town's history, it is not one which is manifested significantly in the town's present character. It is, however, reflected in a more intangible sense to an extent by the proliferation of patriotic and commemorative street names relating to the battle of Waterloo in the roughly contemporary townhouse and terraced housing developments at East Cliff (Plains of Waterloo, Wellington Crescent, Nelson Crescent, La Belle Alliance Square)<sup>81</sup>".*

#### **Consolidation – c.1850 to 1914**

*"The latter part of the 19th century and the lead up to World War I saw the consolidation of the town as a resort destination. It also saw its evolution from a resort for polite society to one attracting visitors further down the social scale.<sup>82</sup>".*

*"The early railway network and its later rationalisation had a distinctive impact on the development of the town. Ramsgate, as a bustling port and resort, was such a prize for operators of the emerging railway network that two companies competed to provide the best connection to the town. LCDR was able to bring its line through the cliffs to the seafront right next to the harbour<sup>83</sup>".*

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<sup>79</sup> Ibid Page 20

<sup>80</sup> Ibid Page 21

<sup>81</sup> Ibid Page 21

<sup>82</sup> Ibid Page 23

<sup>83</sup> Ibid Page 23

*“The town also developed features closely associated with seaside resorts over this period. These included large **seafront hotels, promenades, a pleasure pier and concert halls by the seafront (Royal Victoria Pavilion and West Cliff Hall)**<sup>84</sup>.”*

*“The **Saint Cloud (now the Comfort Inn) and the Granville**. These became Ramsgate’s closest equivalent to the grand seaside hotels constructed at other English resorts during this period. The proprietor of Granville also sought to maximise the appeal of the **hotel by reducing the distance from the hotel on the clifftop to the beach**. This was achieved by undertaking a considerable programme of engineering of the cliffs directly below the hotel to create an access road down to beach level and construction of a commercial development adjacent to the seafront known as Granville Marina...The promenades were originally laid out in the mid-19th century. These ran along the sections of the clifftop closest to the harbour. The early layout and character of the promenades has been altered by early 20th-century promenade improvements but some of the **Victorian shelters survive on the section by Victoria Parade at East Cliff**. Ramsgate’s **pleasure pier, Marina Pier, was built adjacent to the Granville Marina in the 1870s**. **The Royal Victoria Pavilion concert hall** was opened as a major seafront attraction in 1906. Whilst it is no longer in use for its primary purpose, it remains a seafront landmark due to its scale and distinctive design<sup>85</sup>.”*

*“Ramsgate, having grown from a settlement dependent upon St Lawrence, historically lacked a church and was not a parish in its own right. In recognition of its increased size and independent role, it was created as a parish in the mid-19th century and gained its own parish church, **St George’s, in the 1850s**<sup>86</sup>.”*

*“As the seafront was so important for port operations and for the appeal of the resort, an innovative development was proposed which comprised the cutting of new roadways from the clifftops down to the harbour and the incorporation of **storage and ornamental features as part of the design**. Storage comprised arches under the **roadway providing access to the West Cliff, Royal Parade,***

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<sup>84</sup> *Ibid* Page 23

<sup>85</sup> *Ibid* Page 24

<sup>86</sup> *Ibid* Page 25

**and ornamental Pulhamite** gardens around that leading to the **East Cliff, Madeira Walk. Royal Parade** was also given distinctive ornamentation with the use of decorative brickwork and architectural ceramics to create an arcaded appearance and the construction of Pulhamite cliffs to back the arches on the landward side of the road. These **arches also included niches for seats so that the view from the elevated roadway** could be admired. This **distinctive civic infrastructure added significantly to the appearance of the harbour area, creating an imposing but attractive backdrop to it.** It still remains a key aspect of the experience of the area and one of the **town's most characteristic features**<sup>87</sup>".

"The **architect AWN Pugin** and the financier **Sir Moses Montefiore**. Pugin, noted **Gothic revivalist** and promoter of his Roman Catholic faith, settled at West Cliff in the mid-19th century and began creating his ideal retreat and family home and an idealised church and religious community. His work on the first two aspects of this, a villa called **The Grange** and the adjacent **Roman Catholic church of St Augustine** lying. The complex of Pugin buildings around the Grange survive and, as well as evidencing Pugin's promotion of Catholicism, **are one of the key groupings of Gothic revival buildings in the country**<sup>88</sup>".

I am running out of time so I will move on quickly to Manston's history.

### **Manston's History**

*"At the outset of the Great War, the Isle of **Thanet was equipped** with a small and precarious **landing strip for aircraft at St Mildreds Bay, Westgate**, on top of the chalk cliffs, at the foot of which was a promenade which had been used for seaplane operations<sup>89</sup>. "In the **winter of 1915-1916** these early aircraft first began to use the **open farmlands at Manston as a site for emergency landings.** Thus was*

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<sup>87</sup> *Ibid* Page 27

<sup>88</sup> *Ibid* Page 27

<sup>89</sup> Forces War Records Unit History: RAF Manston [REDACTED]

soon established the Admiralty Aerodrome at Manston. It was not long after this that the **training school, set up originally to instruct pilots in the use of the new Handley Page bombers**, was established, and so by the close of 1916 there were already two distinct units stationed at Manston, the Operational War Flight Command and the Handley Page Training School<sup>90</sup>.

“At a time when Zeppelin raids were bringing the war directly to English civilians, **daylight bombing raids** by German ‘Gotha’ Bombers, **a twin engined biplane**, would have been considerably more effective were it not for the **RFC’s presence** at Manston<sup>91</sup>.

“Shortly after such formation raids and in consequence the Cabinet recommended the creation of a separate Air Ministry. The RAF was officially formed on 1 April 1918<sup>92</sup>”.

“In World War II, during an eventful Battle of Britain, Manston was heavily bombed and airfield buildings destroyed... Being **close to the front-line** and having a **long and broad runway** (currently listed as 2,752 metres x 61 metres) the airfield became something of a **magnet for badly damaged aeroplanes** that had suffered from ground fire, collisions, or air attack but retained a degree of airworthiness. The **airfield became something of a "graveyard" for heavy bombers** and no doubt the less-damaged portions of aircraft landing or otherwise arriving here sometimes provided spare parts for other allied aircraft in need of repair<sup>93</sup>”.

“During the Cold War of the 1950s the United States Air Force used Manston as a Strategic Air Command base for its fighter and fighter-bomber units. With the USAF’s withdrawal from Manston, the airfield became a joint civilian and RAF airport from 1960 and was thence employed for occasional package tour and

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<sup>90</sup> Forces War Records Unit History: RAF Manston [REDACTED]

<sup>91</sup> *Ibid*

<sup>92</sup> *Ibid*

<sup>93</sup> *Ibid*

*cargo flights, alongside its continuing role as an RAF base. The Air Cadets used the northern side of the airfield as a gliding site, and an Air Experience Flight flying De Havilland Chipmunks was based there. Thanks to its broad long runway, (built during World War II, along with Woodbridge's, to **allow returning damaged bombers** a longer than usual runway to land on) Manston was used as a diversionary airfield for emergency military and civilian landings <sup>94</sup> ”.*

---

<sup>94</sup> *Ibid*



## McConnell, Pam - AH PH

---

**From:** Andrew Buroni <BuroniA@rpsgroup.com>  
**Sent:** 15 February 2018 11:13  
**To:** Scott-Clark, Andrew - AH PH (Public Health)  
**Subject:** RE: Manston Airport Health Assessment

Thanks Andrew

No need to apologise, as a DPH, I can only imagine how busy you are.

All my best

Andrew

---

**Dr Andrew Buroni**  
**Technical Director of Health - RPS Planning & Development**  
6-7 Lovers Walk,  
Brighton, East Sussex, BN1 6AH.  
United Kingdom

**Tel:** +44 (0) 1273 546 800  
**Email:** [BuroniA@rpsgroup.com](mailto:BuroniA@rpsgroup.com)  
**www:** [www.rpsgroup.com](http://www.rpsgroup.com)

---

**From:** Andrew Scott-Clark@kent.gov.uk [mailto:Andrew.Scott-Clark@kent.gov.uk]  
**Sent:** 15 February 2018 10:47  
**To:** Andrew Buroni  
**Subject:** [EXT] RE: Manston Airport Health Assessment

Andrew

- Thanet Clinical Commissioning Group; OGILVIE, Ailsa (NHS THANET CCG) [ailsaogilvie@nhs.net](mailto:ailsaogilvie@nhs.net), Clinical Chair is Tony Martin <[tony.martin@nhs.net](mailto:tony.martin@nhs.net)>
- [East Kent Hospitals Foundation Trust](#); Acting CEO is Susan Acott ([susan.acott@nhs.net](mailto:susan.acott@nhs.net))
- Kent Community Healthcare Foundation Trust; CEO is Paul Bentley ([p.bentley@nhs.net](mailto:p.bentley@nhs.net))
- Kent and Medway Partnership Trust; and CEO is Helen Greateorex ([helen.greateorex@nhs.net](mailto:helen.greateorex@nhs.net))
- Southeast Ambulance Trust. CEO is new, and not sure his email address; link to Trust is: [http://www.secamb.nhs.uk/about\\_us/trust\\_board1.aspx](http://www.secamb.nhs.uk/about_us/trust_board1.aspx)

Apologies for delay

**Andrew Scott-Clark** | Director of Public Health | Kent County Council | Room 1.61, Sessions House, County Hall, County Road, Maidstone, Kent, ME14 1XQ | Internal 7200 416659 | External: +443000416659 | [www.kent.gov.uk](http://www.kent.gov.uk) |

---

**From:** Andrew Buroni [mailto:BuroniA@rpsgroup.com]  
**Sent:** 24 January 2018 17:00  
**To:** Tara Barratt <[Tara.Barratt@rpsgroup.com](mailto:Tara.Barratt@rpsgroup.com)>; Scott-Clark, Andrew - AH PH (Public Health) <[Andrew.Scott-Clark@kent.gov.uk](mailto:Andrew.Scott-Clark@kent.gov.uk)>

**Cc:** Tom Dearing <[tom.dearing@rpsgroup.com](mailto:tom.dearing@rpsgroup.com)>

**Subject:** Manston Airport Health Assessment

Hi Andrew

We are coming to the end of the assessment phase now, and while it is scoped to your requirements, I am conscious that we still need to engage with the wider health stakeholders you wanted us to talk with, including:

- Thanet Clinical Commissioning Group;
- East Kent Hospitals Foundation Trust;
- Kent Community Healthcare Foundation Trust;
- Kent and Medway Partnership Trust; and
- Southeast Ambulance Trust.

Given how busy everyone's diaries are, I think it might be more effective if I call each of them individually to make sure we consider their health concerns or requirements within the assessment.

I was wondering if you have any particular individual you would like us to contact within each organisation, but also if you might be able to introduce us by way of email. I know its cheeky, but an introduction from a DPH, tends to have more effect than us cold calling them.

All my best, and I hope you had a great Christmas and new year

Andrew

---

**Dr Andrew Buroni**

**Technical Director of Health - RPS Planning & Development**

6-7 Lovers Walk,

Brighton, East Sussex, BN1 6AH.

United Kingdom

**Tel:** +44 (0) 1273 546 800

**Direct:** +44 (0) 1273 546 822

**Email:** [BuroniA@rpsgroup.com](mailto:BuroniA@rpsgroup.com)

**www:** [www.rpsgroup.com](http://www.rpsgroup.com)

---

**From:** Tara Barratt

**Sent:** 20 December 2017 12:25

**To:** [Andrew.Scott-Clark@kent.gov.uk](mailto:Andrew.Scott-Clark@kent.gov.uk)

**Cc:** Andrew Buroni; Tom Dearing

**Subject:** Manston HIA Health Stakeholder Meeting

Good afternoon Andrew,

Following your comments on the draft scope of the Manston Health Impact Assessment, please see attached for my letter regarding the coordination of a health stakeholder meeting early next year.

I am on annual leave from tomorrow and the office will be closed between Christmas and the new year but I look forward to hearing from you come January at your earliest convenience.

Merry Christmas and a happy new year.

Kind regards,

Tara

---

**Tara Barratt**

**Assistant Consultant - Environment - RPS Planning & Development**

6-7 Lovers Walk,  
Brighton, East Sussex, BN1 6AH.  
United Kingdom

**Tel:** +44 (0) 1273 546 800

**Email:** [Tara.Barratt@rpsgroup.com](mailto:Tara.Barratt@rpsgroup.com)

**www:** [www.rpsgroup.com](http://www.rpsgroup.com)

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## McConnell, Pam - AH PH

---

**From:** Andrew Buroni <BuroniA@rpsgroup.com>  
**Sent:** 02 February 2018 12:12  
**To:** Scott-Clark, Andrew - AH PH (Public Health)  
**Subject:** RE: Manston Airport Health Assessment

Hi Andrew  
Welcome back. I hope it was a nice break.

Do you have any particular individuals you would like me to contact for each?

Andrew

---

**Dr Andrew Buroni**  
**Technical Director of Health - RPS Planning & Development**  
6-7 Lovers Walk,  
Brighton, East Sussex, BN1 6AH.  
United Kingdom

**Tel:** +44 (0) 1273 546 800  
**Email:** [BuroniA@rpsgroup.com](mailto:BuroniA@rpsgroup.com)  
**www:** [www.rpsgroup.com](http://www.rpsgroup.com)

---

**From:** Andrew.Scott-Clark@kent.gov.uk [mailto:Andrew.Scott-Clark@kent.gov.uk]  
**Sent:** 02 February 2018 12:09  
**To:** Andrew Buroni  
**Subject:** [EXT] RE: Manston Airport Health Assessment

Andrew

Apologies have been on Annual Leave. There is no one meeting that all NHS Providers attend and therefore agree with your suggestion to approach each for evidence individually.

WBW

**Andrew Scott-Clark** | Director of Public Health | Kent County Council | Room 1.61, Sessions House, County Hall, County Road, Maidstone, Kent, ME14 1XQ | Internal 7200 416659 | External: +443000416659 |  
| [www.kent.gov.uk](http://www.kent.gov.uk) |

---

**From:** Andrew Buroni [mailto:BuroniA@rpsgroup.com]  
**Sent:** 24 January 2018 17:00  
**To:** Tara Barratt <Tara.Barratt@rpsgroup.com>; Scott-Clark, Andrew - AH PH (Public Health) <Andrew.Scott-Clark@kent.gov.uk>  
**Cc:** Tom Dearing <tom.dearing@rpsgroup.com>  
**Subject:** Manston Airport Health Assessment

Hi Andrew

We are coming to the end of the assessment phase now, and while it is scoped to your requirements, I am conscious that we still need to engage with the wider health stakeholders you wanted us to talk with, including:

- Thanet Clinical Commissioning Group;
- East Kent Hospitals Foundation Trust;
- Kent Community Healthcare Foundation Trust;
- Kent and Medway Partnership Trust; and
- Southeast Ambulance Trust.

Given how busy everyone's diaries are, I think it might be more effective if I call each of them individually to make sure we consider their health concerns or requirements within the assessment.

I was wondering if you have any particular individual you would like us to contact within each organisation, but also if you might be able to introduce us by way of email. I know its cheeky, but an introduction from a DPH, tends to have more effect than us cold calling them.

All my best, and I hope you had a great Christmas and new year

Andrew

---

**Dr Andrew Buroni**  
**Technical Director of Health - RPS Planning & Development**  
6-7 Lovers Walk,  
Brighton, East Sussex, BN1 6AH.  
United Kingdom

**Tel:** +44 (0) 1273 546 800  
**Email:** [BuroniA@rpsgroup.com](mailto:BuroniA@rpsgroup.com)  
**www:** [www.rpsgroup.com](http://www.rpsgroup.com)

---

**From:** Tara Barratt  
**Sent:** 20 December 2017 12:25  
**To:** [Andrew.Scott-Clark@kent.gov.uk](mailto:Andrew.Scott-Clark@kent.gov.uk)  
**Cc:** [Andrew Buroni](#); [Tom Dearing](#)  
**Subject:** Manston HIA Health Stakeholder Meeting

Good afternoon Andrew,

Following your comments on the draft scope of the Manston Health Impact Assessment, please see attached for my letter regarding the coordination of a health stakeholder meeting early next year.

I am on annual leave from tomorrow and the office will be closed between Christmas and the new year but I look forward to hearing from you come January at your earliest convenience.

Merry Christmas and a happy new year.

Kind regards,  
Tara

---

**Tara Barratt**  
**Assistant Consultant - Environment - RPS Planning & Development**  
6-7 Lovers Walk,  
Brighton, East Sussex, BN1 6AH.

United Kingdom

**Tel:** +44 (0) 1273 546 800

**Email:** [Tara.Barratt@rpsgroup.com](mailto:Tara.Barratt@rpsgroup.com)

**www:** [www.rpsgroup.com](http://www.rpsgroup.com)

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## McConnell, Pam - AH PH

---

**From:** Andrew Buroni <BuroniA@rpsgroup.com>  
**Sent:** 27 October 2017 17:01  
**To:** Scott-Clark, Andrew - AH PH (Public Health); Tara Barratt  
**Cc:** Barrett, Catherine - AH PH (Public Health); Tara Barratt  
**Subject:** RE: Manston Airport Health Impact Assessment

Dear Andrew

Thanks again for the call, and your subsequent response.

I wanted to give you a quick heads up on where we are, and next steps.

We modified the scoping statement to reflect your comments and finalised it. I have attached a copy for you. But the short version was that the process, scope and focus were appropriate, and you reinforced the need to consider local circumstance and pockets of inequality. You also hit home how sensitive local health care services are, and as discussed, we acknowledge that this is likely to be subject to more, not less austerity measures. This isn't captured in the scoping statement, but is a key feature in the community profile we have nearly completed, and will form the basis to the assessment to understand the distribution and significance of any potential impact (be it adverse or beneficial).

One of the key changes to the scoping statement was an additional line about engaging with wider health stakeholders.

As per the suggestion of the DPH, and with his support, the overarching engagement strategy is to be supplemented with a public health themed meeting with key health stakeholders including Thanet Clinical Commissioning Group, East Kent Hospitals Foundation Trust, Kent Community Healthcare Foundation Trust, Kent and Medway Partnership Trust, and Southeast Ambulance Trust to further investigate local health issues and opportunities.

Is this in keeping with what you had in mind, and would you be able to help us to get "bums on seats" for this. I ask, as we both know just how busy each of these health stakeholders are, and the difficulty in coordinating a time and venue that accommodates them all. An invite from you, would be far more effective than from me. Equally, it may be the case that a health forum of some type may already be on the cards, of which we may be able to squeeze in as an agenda item? Any help in this regard would be most gratefully received.

In terms of next steps, the bulk of the assessment is due to take place imminently, and we are also already working on the health action plan (mitigation and support initiatives). Do let me know if there are any ongoing community/health initiatives you are working on, as we may be able to feed into them (training, education, employment, lifestyle wellbeing etc.).

All my best

Andrew

---

**Dr Andrew Buroni**  
**Technical Director of Health - RPS Planning & Development**  
6-7 Lovers Walk,  
Brighton, East Sussex, BN1 6AH.

United Kingdom

**Tel:** +44 (0) 1273 546 800

**www:** [www.rpsgroup.com](http://www.rpsgroup.com)

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---

**From:** Andrew.Scott-Clark@kent.gov.uk [mailto:Andrew.Scott-Clark@kent.gov.uk]

**Sent:** 10 October 2017 17:39

**To:** Tara Barratt

**Cc:** Andrew Buroni; Catherine.Barrett@kent.gov.uk

**Subject:** [EXT] RE: Manston Airport Health Impact Assessment

Further to our telephone conversation last week, I'm now responding on the draft scope of the HIA you have sent me for comment.

As you are aware the population of Thanet is diverse with a range of health needs with some of the most deprived communities in Kent being resident in the district of Thanet. In fact of the 88 Lower Layer Super output areas which make up the population with the highest rates of all age all cause mortality or lowest life expectancy in Kent, some 24 of those are situated in Thanet. A number of these will directly affected by your proposals, particularly Newington and Central Harbour/Eastcliffe areas of Ramsgate. We know that these populations will be more adversely affected by issues such as noise and air pollution than the general population.

The local health economy is also struggling to deliver sustainable health care services and the organisations that are responsible for delivering these (both commissioning and providing) will need to be consulted. This includes Thanet Clinical Commissioning Group, East Kent Hospitals Foundation Trust, Kent Community Healthcare Foundation Trust, Kent and Medway Partnership Trust, Southeast Ambulance Trust, as clearly both the construction phase and the operation phase may have impact on local health services; services that are currently under significant financial and capacity pressure.

I hope this is useful at this stage. Please note that I'm on A/L from today until 20<sup>th</sup> October inclusive and am happy to discuss further on my return.

Your sincerely

**Andrew Scott-Clark** | Director of Public Health | Kent County Council | Room 1.61, Sessions House, County Hall, County Road, Maidstone, Kent, ME14 1XQ | Internal 7200 416659 | External: +443000416659 | [www.kent.gov.uk](http://www.kent.gov.uk) |

**\*\*Please note my new KCC phone number**

---

**From:** Tara Barratt [mailto:Tara.Barratt@rpsgroup.com]

**Sent:** 28 September 2017 17:27

**To:** Scott-Clark, Andrew - AH PH (Public Health)

**Cc:** Andrew Buroni; Barrett, Catherine - AH PH (Public Health)

**Subject:** RE: Manston Airport Health Impact Assessment

Hi Andrew,

Thanks for the quick response. Would you be around for a phone call early next week? We are working to a very tight schedule on this one.



Thanks,  
Tara

---

**From:** [Andrew.Scott-Clark@kent.gov.uk](mailto:Andrew.Scott-Clark@kent.gov.uk) [<mailto:Andrew.Scott-Clark@kent.gov.uk>]  
**Sent:** 28 September 2017 17:23  
**To:** Tara Barratt  
**Cc:** Andrew Buroni; [Catherine.Barrett@kent.gov.uk](mailto:Catherine.Barrett@kent.gov.uk)  
**Subject:** [EXT] RE: Manston Airport Health Impact Assessment

Tara

Thanks, what are your time scales please; Catherine Barrett is my PA and a conference call at some stage in October would be useful (note I'm on A/L for middle two weeks).

WBW

**Andrew Scott-Clark** | Director of Public Health | Kent County Council | Room 1.61, Sessions House, County Hall, County Road, Maidstone, Kent, ME14 1XQ | Internal 7200 416659 | External: +443000416659 |  
| [www.kent.gov.uk](http://www.kent.gov.uk) |

**\*\*Please note my new KCC phone number**

---

**From:** Tara Barratt [<mailto:Tara.Barratt@rpsgroup.com>]  
**Sent:** 28 September 2017 14:58  
**To:** Scott-Clark, Andrew - AH PH (Public Health)  
**Cc:** Andrew Buroni  
**Subject:** Manston Airport Health Impact Assessment

Dear Andrew,

We have been commissioned to investigate and set the scope and focus for a Health Impact Assessment for Manston Airport Development Consent Order (DCO) in Thanet district.

You may already know, but there has been a recent change to the Environmental Impact Assessment (EIA) regulations, which reinforced the consideration of health matters through planning. The catch being, that they don't define what this means, and it is generally left to the proponent to define an appropriate approach, scope and focus. While this is the case, I believe it is important to work with local public health teams, as planning and public health (health protection, promotion and care) overlap and have a common goal. Equally, public health teams have a far greater awareness as to local health circumstance, relative sensitivity, but also current and emerging health and health care priorities and needs than can't always be gleaned through national statistics or even the JSNA.

With this in mind, I was wondering if you (or a member of the public health team) would be able to review the draft HIA Scoping Statement, where we could then arrange a phone call to discuss the project and the scope of assessment as we currently see it. The scoping statement is work in progress, and at this stage is intended to bring you up to speed on the project and prompt a discussion on any gaps or community concerns that need addressing or any opportunities and community support initiatives to explore. On this basis, it is not suitable for wider distribution, and following your input, would be applied to inform the planning application and its assessment.

Please do call if you have any queries.

Thanks,  
Tara

**Tara Barratt**  
**Assistant Consultant - Environment - RPS Planning & Development**  
6-7 Lovers Walk,  
Brighton, East Sussex, BN1 6AH.  
United Kingdom

**Tel:** +44 (0) 1273 546 800

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---



**Manston Airport**

**Health Impact Assessment**

**Final Scoping Statement**

**RiverOak Strategic Partners**



## Quality Management

<b>Prepared by:</b>	Tara Barratt (MSc, DIC, BSc, AIEEMA)	HIA Consultant		
<b>Reviewed &amp; checked by:</b>	Andrew Buroni (PhD, MSc, BSc, FRSM)	Technical Director		
<b>Authorised by:</b>	Andrew Buroni (PhD, MSc, BSc, FRSM)	Technical Director		
<b>Date of issue:</b>	17/10/17	<b>Revision number:</b>	2	
<b>Project number</b>	OXF10759			
<b>Document file path:</b>	\\brig-lw-03\EnvPlanning\10759 Manston DCO HIA\Scoping\Manston Scoping Statement_Rev2.docx			

Revision History				
Rev	Date	Status	Reason for revision	Additional comments
0	27/09/17	Draft	-	-
1	28/09/17	Draft	Internal comments	-
2	17/10/17	Draft	Comments from Director of Public Health	

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# 1 Introduction

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## Background

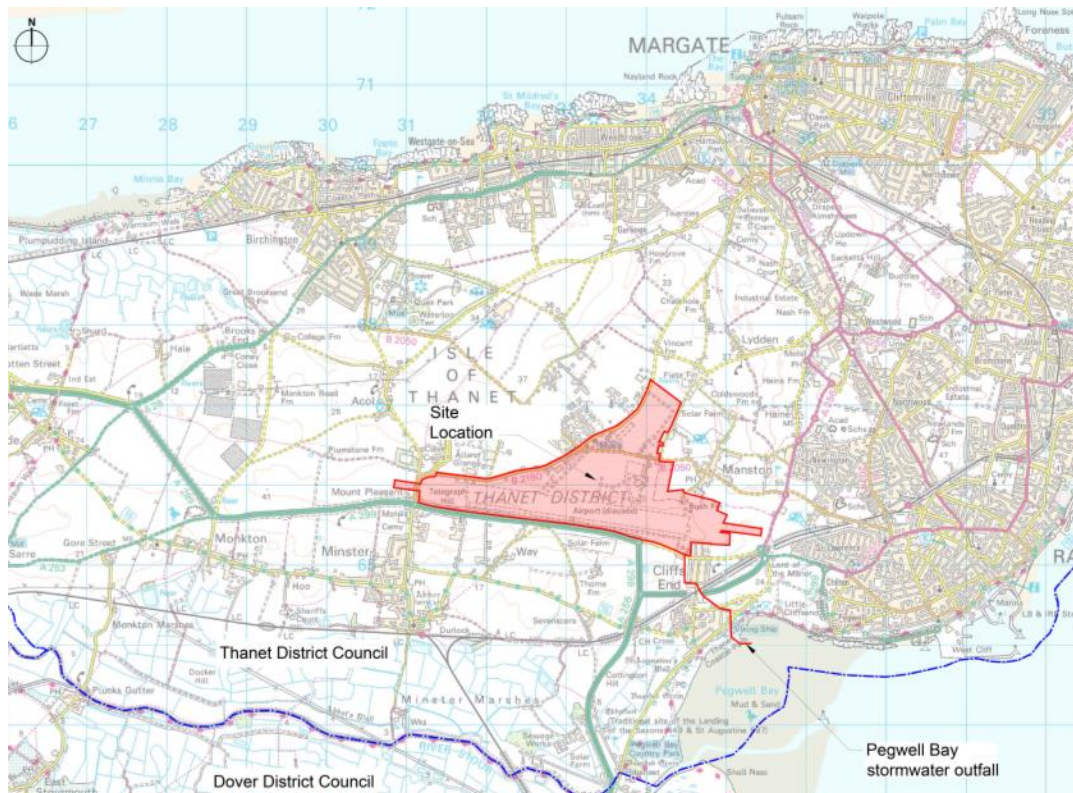
- 1.1 In keeping with best practice, RPS has been appointed to provide a Health Impact Assessment (HIA) for the Manston Airport development project which is proposing to reopen the closed Manston Airport site and redevelop it to principally provide an air freight and cargo hub in the south east with some passenger services (the Proposed Development).
- 1.2 This Scoping Statement comprises one of the primary stages of the HIA process, and has informed a discussion with the Kent Director of Public Health (DPH) in order to discuss and agree the scope and focus of the HIA and ensure all expectations are met with regards to assessing the potential public health and wellbeing impacts from the Proposed Development.
- 1.3 Following engagement with the DPH, the approach, process and methodology proposed are considered appropriate, as is the scope and focus of potential health pathways suggested. The main input from the DPH was to communicate existing pockets of health inequality within the area and associated sensitivity to both environmental and socio-economic health pathways.
- 1.4 The DPH further explained the challenges faced by local health care providers, and the potential impact that the construction and operational phases could have on local healthcare demand and capacity. The DPH recommended that wider health stakeholders including the Thanet Clinical Commissioning Group, East Kent Hospitals Foundation Trust, Kent Community Healthcare Foundation Trust, Kent and Medway Partnership Trust, and Southeast Ambulance Trust, be made aware of the proposed application. This final HIA Scoping Statement has therefore been amended to apply the DPH's comments, and explore ways in which the proposed Manston Airport Project can support the delivery of local health objectives and priorities.
- 1.5 The remainder of this section provides a brief project overview. Section 2 outlines the key health pathways agreed with the DPH, and sets out the approach, process and specific methodologies to investigate, assess and address them.

## Project Description

### Site Location

- 1.6 The application site, as shown in Figure 1.1, is on the existing site of Manston Airport, west of the village of Manston and north east of the village of Minster, in Kent. The town of Margate lies approximately 5km to the north of the site and Ramsgate approximately 4km to the east. Sandwich Bay is located approximately 4-5km to the south east.

Figure 1.1: Site Location



- 1.7 The northern part of the site is bisected by the B2050 (Manston Road), and the site is bounded by the A299 dual carriageway to the south and the B2190 (Spitfire Way) to the west. The existing site access is from the B2050.
- 1.8 The surrounding area is generally characterised by a low density of villages, small groups of residential properties and individual properties.

### Project Timescale

- 1.9 As demonstrated in Table 1.1, construction will take place in four phases; Phase 1 will see a number of different construction activities undertaken in order to ensure that the airport is returned to operational use in Year 2 (2020), with passenger services expected to follow in Year 3 (2021). There would be some operational activities undertaken in Year 1 (2019), for example the development of the airport's operational and management procedures and the recruitment and training of direct airport staff.
- 1.10 Phases 2-4 of the construction process will take place whilst the airfield is operational and will focus on delivering the increased infrastructure and facilities required to meet the demand of the air freight and passenger forecasts.



**Table 1.1: Project Timescale**

Component	Start Date	End Date
Construction Phase 1	2019	2020
Construction Phase 2	2020	2023
Construction Phase 3	2023	2030
Construction Phase 4	2030	2036

### Proposed Development

1.11 The site covers an area of approximately 296 hectares and comprises a combination of existing buildings and hardstanding, large expanses of grassland, and some limited areas of scrub and/or landscaping.

#### Construction Phase

1.12 Expected construction activities include earthworks, concrete paving, asphalt paving and building foundation preparation. To complete this work, specialised construction equipment will be required including: excavators, pavers, rollers, cranes, sweepers and vans/trucks. Any construction activities that require the closing of the runway will be undertaken during Construction Phase 1, with activities during this and subsequent phases limited to those that can be carried out with minimal disruption to airport operations.

1.13 A summary of the works to be undertaken as part of the Proposed Development are presented below:

- site set-up and establishment;
- new site access and internal access roads;
- construction of surface water drainage system, including construction of attenuation ponds;
- installation of new and/or upgrade to existing site services and utilities;
- earthworks to create building platform;
- runway rehabilitation (asphalt paving);
- construction of new taxiways, aprons and cargo stands (concrete paving);
- highway improvements (Spitfire Way/Manston Road junction);
- construction of new air freight and cargo facilities;
- construction of new terminal building and car parking facilities;
- construction, refurbishment and/or relocation of existing business aviation, flight school and training, and helicopter/heli-charter services;
- construction/installation of new air traffic control, approach lights, airfield ground lighting, navigational aids and radar;

- construction of new Rescue and Fire Fighting Service facilities, and fire training ground; and
  - landscaping along the boundary with Spitfire Way and Manston Road.
- 1.14 During Construction Phase 1, working hours will be Monday to Friday 07:30 to 17:30, and Saturday 07:30 to 13.00; there would be no planned working on Sundays or Bank Holidays. During Construction Phases 2-4, when the airport would also be operational, construction may need to take place outside of these hours including at night. If required all activities undertaken during the night time will be analysed as part of the development of the Construction Environmental Management Plan (CEMP) provided to minimise disruption to local communities.
- 1.15 Direct employment during Construction Phase 1 is anticipated to require 230 personnel on average, with a maximum of 630 personnel during the peak construction period.

### **Operation Phase**

- 1.16 Once fully operational, the Proposed Development shall consist of the following principal components:
- an area for cargo freight operations able to handle at least 10,000 movements per year; and
  - facilities for other aviation-related development, including:
    - a passenger terminal and associated facilities;
    - an aircraft teardown and recycling facility;
    - a flight training school;
    - a base for at least one passenger carrier;
    - a fixed base operation for executive travel; and
    - business facilities for aviation related organisations.
- 1.17 The lifetime of the Proposed Development is forecast to be 20 years but will likely extend beyond this date.
- 1.18 Daytime operating hours for the airport are defined as 07.00 to 23.00, but with limited exceptions during a shoulder period from 06.00 to 07.00 for certain passenger flights. Air freight operations would predominantly take place during the daytime spread evenly between the hours of 07.00 to 23.00, in accordance with operations at other similar air freight airports. There may be a requirement for a small number of night-time flights; this is yet to be determined but at worst case, there will be a maximum of eight flights between the hours of 23.00 and 07.00.
- 1.19 It is anticipated that there will be 887 direct jobs created per 1 million passengers or 100,000 tonnes of freight. Following this, it is predicted that there will be 2,100 indirect/induced jobs for every 1,000 direct jobs and 4,000 catalytic jobs per 1,000 direct jobs.

**Decommissioning Phase**

- 1.20 As it is anticipated that the airport will be operational long into the future, there is no decommissioning requirement for the airport. As a result, the assessment of any health and wellbeing impacts from this stage has been scoped out.

## 2 Health Scoping Exercise

### Introduction

- 2.1 Following a review of the Proposed Development, construction and operational activities have been broken down into individual health pathways to explore any potential change in hazard exposure that might influence local community health, and to ascertain how and where they may already be addressed and assessed within the Environmental Impact Assessment (EIA).

### Health Pathways

- 2.2 The HIA scope will be to assess construction activities and future operation of the airport as a new air freight and cargo hub with some passenger flights in the south east.
- 2.3 The HIA will consider potential impacts on physical, social and mental health and wellbeing that may arise through environmental and socio-economic pathways. It will draw from the evidence presented in the Environmental Statement (ES) for the Proposed Development.
- 2.4 A health pathway can be described as the way in which an activity influences a known determinant of health. From a preliminary review, and following engagement with the DPH, the health and wellbeing pathways outlined in Table 2.1 are considered to be potentially relevant.

**Table 2.1: Health Pathways**

Feature	Health Pathway	Potential Impact	Timescale	Geographic Scope
Construction Phase	Air and ground noise exposure	Adverse	Temporary	Local/Regional
	Air quality	Adverse	Temporary	Local
	Road safety, potential community severance and impacts on access to services	Adverse	Temporary	Local/Regional
	Potential change in local health care demand from a non-local temporary workforce	Adverse	Temporary	Local
	Socio-economic impacts (employment, income, investment and training/education)	Beneficial	Temporary	Regional
Operational Phase	Air and ground noise exposure	Adverse	Permanent	Local/Regional
	Air quality	Neutral	Permanent	Local
	Road safety, potential community severance and impacts on access to services	Adverse	Permanent	Local/Regional
	Socio-economic impacts (employment, income, investment and training/education)	Beneficial	Permanent	Regional

- 2.5 The HIA study area will be defined by the spatial scope of the relevant health pathways and evidence-base for health impacts: for example air quality impacts are likely to be modelled within a few kilometres of the airport, within which a change in pollutant concentrations that could affect health may define a smaller study area, whereas employment generation may affect a larger area. In general, impacts of the Proposed Development on local communities around the airport will be the focus of the assessment, but in some cases regional or national impacts (e.g. socio-economic impacts) may also be relevant. The community profile developed for the HIA will identify the study area population and sensitive groups within the community.

## **Approach and Methodology**

### **Health Impact Assessment**

- 2.6 HIA is a well-established methodology for assessing the impacts of major development projects that may affect public health where 'health' is defined on a broad socio-economic model that encompasses conventional health impacts such as disease, accidents and risk, along with wider health determinants vital to achieving good health and wellbeing such as employment, social networks and local amenity. It considers both physical and mental health, and also addresses equality and social impacts. In the WHO definition, 'health' is "*a state of complete physical, mental and social wellbeing and not merely the absence of disease or infirmity*" [1].
- 2.7 Although not explicitly required by the Aviation Policy Framework [2], HIA is often regarded as good practice for major developments, and has been performed for several airports in the UK. In addition, Paragraph 4(2)(a) and Schedule 4 of the recent 2017 EIA Regulations [3] require that the EIA process assesses the effects (where likely to be significant) on population and human health, among other factors. While health is inherently assessed and addressed through planning within EIA, HIA is considered to be an effective means of further communicating and setting any potential risk into a context amenable to both decision makers and the public alike.

### **Approach**

- 2.8 A key aspect of the approach will be to iteratively support and build upon the technical information provided within the Environmental Statement, to ensure the HIA is based upon realistic changes in environmental and socio-economic conditions directly attributed to the proposed project. This also represents a means to facilitate a coordinated approach to planning, the environment and health.

### **Process and Methodology**

- 2.9 As detailed below, core stages of the HIA will include the development of a project and community profile, stakeholder engagement, assessment and the development of a Health Action Plan.

### **Project Profile**

- 2.10 The project profile will draw from the planning application, the ES and available literature to outline the core airport activities and associated health pathways to be assessed. Identification of potential health pathways helps to define the scope of the study, from which it is possible to develop a suitable evidence base and a more informed community profile. The distribution, magnitude and significance of the health pathways are then investigated within the assessment stage.

### **Community Profile**

- 2.11 Evidence suggests that different communities have varying susceptibilities to health impacts and benefits as a result of social and demographic structure, behaviour and relative economic circumstance [4]. A community profile therefore not only forms the basis to exposure response modelling, but also provides a means to consider how potential health pathways identified in the project profile might act disproportionately upon certain communities and sensitive groups. In this instance, the community profile will make use of available demographic and health care data, as well as any socio-economic data made available for the project.

### **Stakeholder Engagement**

- 2.12 The responses from key stakeholders and key representatives of local communities following the statutory consultation event that took place in June-July 2017 will form an important component of gathering an appropriate evidence base and tailoring the HIA to local circumstance. By highlighting and responding to community concerns the HIA can be applied to address perceived as well as actual risks and develop more effective recommendations to reduce adverse impacts and maximise health benefits.
- 2.13 As per the suggestion of the DPH, and with his support, the overarching engagement strategy is to be supplemented with a public health themed meeting with key health stakeholders including Thanet Clinical Commissioning Group, East Kent Hospitals Foundation Trust, Kent Community Healthcare Foundation Trust, Kent and Medway Partnership Trust, and Southeast Ambulance Trust to further investigate local health issues and opportunities.

### **Assessment**

- 2.14 Following confirmation on the scope and focus, the assessment will seek to address each of the core health pathways identified, and where possible, apply internationally recognised quantitative assessment methods to establish the distribution, significance and likelihood of worst-case potential health outcomes. However, as a minimum the assessment is anticipated to include:

Construction:

- qualitative appraisal as to the potential health impact from changes in local air quality from dust nuisance during construction;

- quantitative exposure response modelling for changes in concentration exposure to ground-borne emissions to air (following the provision of information from the air quality assessment);
- qualitative appraisal as to community disruption and potential health outcome from changes in noise and vibration;
- quantitative risk assessment from changes in road traffic movements and subsequent risk of accident and injury; and
- qualitative appraisal as to the socio-economic health benefits from direct, indirect/induced, and catalytic income and employment opportunities.

Operation:

- quantitative exposure response modelling for changes in concentration exposure to ground-borne emissions to air;
- qualitative appraisal as to community disruption and potential health outcome from changes in ground-borne noise;
- quantitative exposure response assessment concerning risk of annoyance and sleep disturbance, among other factors, from changes in air-borne noise;
- qualitative appraisal as to community disruption and potential health outcome from changes in road traffic noise; and
- qualitative appraisal as to the socio-economic health benefits of direct, indirect/induced, and catalytic income and employment opportunities.

2.15 To keep the HIA a concise and publicly-accessible document, the assessment will draw upon the technical assessment outputs of the ES but not seek to replicate them within the HIA.

**Health Action Plan (HAP)**

2.16 The HAP will expand on the normal recommendations section within HIA guidance [4], establishing recommended protocols and if relevant any monitoring regimes to be implemented to further reduce and remove potential negative health impacts while maximising opportunities to increase health benefits. The HAP will draw from and build upon the mitigation outlined in the ES and help to develop bespoke airport community support initiatives, tailored to local circumstance and needs.

## References

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- [1] WHO, "Preamble to the Constitution of the World Health Organization as adopted by the International Health Conference, New York, 19-22 June, 1946," Official Records of the World Health Organization, no. 2, p. 100, New York, 1946.
- [2] Secretary of State for Transport, "Aviation Policy Framework," Department for Transport, 2013.
- [3] UK Parliament, "The Town and Country Planning (Environmental Impact Assessment) Regulations 2017," April 2017. [Online]. Available: [http://www.legislation.gov.uk/ukSI/2017/571/pdfs/uksi\\_20170571\\_en.pdf](http://www.legislation.gov.uk/ukSI/2017/571/pdfs/uksi_20170571_en.pdf). [Accessed 1 June 2017].
- [4] PHE, "Critical guide to HIA (WMPHO, England)," PHE, 2007. [Online]. Available: <http://www.apho.org.uk/resource/item.aspx?RID=44422>.



## McConnell, Pam - AH PH

---

**From:** Marchant, Tom - GT EPE  
**Sent:** 19 July 2017 16:05  
**To:** Scott-Clark, Andrew - AH PH (Public Health); OGILVIE, Ailsa (NHS THANET CCG)  
**Subject:** RE: Riveroak Manston Airport Consultation

Afternoon Andrew,

That's great - thank you for your input. I will ensure that your comments are incorporated in the response to the consultation which is due to be submitted by the end of this week.

I will keep you informed of the next stage of consultation.

Regards,

Tom

**Tom Marchant** MRTPI | Head of Strategic Planning and Policy | Environment, Planning and Enforcement | Kent County Council | Invicta House, Maidstone, Kent ME14 1XX | Internal: 413412 | External: 03000 413412 | [www.kent.gov.uk](http://www.kent.gov.uk) | \_\_\_\_\_

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**From:** Scott-Clark, Andrew - AH PH (Public Health)  
**Sent:** 19 July 2017 12:39  
**To:** Marchant, Tom - GT EPE; OGILVIE, Ailsa (NHS THANET CCG)  
**Subject:** RE: Riveroak Manston Airport Consultation

Tom, Ailsa

My comments are as set out below; which is mostly related to I think Question 5 in the consultation about the negative effects of the proposal on the local population, and most importantly members of the local communities most effected by the effects of Noise and Air Pollution.

Starts

Thanet is one of the most deprived areas of Kent and subsequently has amongst the worst health outcomes and lowest life expectancy of all populations in Kent. Analysis produced by Kent County Council Public Health Observatory shows that 24 of the 88 most deprived local population clusters (Lower Layer Super Output areas) are in the geography of Thanet.

Detrimental impacts of both noise and air pollution and therefore likely to have a greater attributable impact on these populations, particularly those people living closest to the airport or impacted directly under the flight path.

These communities are most likely to be:  
Newington (Thanet 013A and Thanet 013B) and  
Ramsgate (Thanet 016C and Thanet 016A).

All these communities have high rates of premature mortality, high emergency admission rates and high rates of disability, and higher than expected rates of diagnosed mental health conditions.

The Newington community has high numbers of social housing and very high numbers of children; and are most likely to be on impacted most by flight noise, particularly night flights.

Noise.

There is very good evidence for the impact noise has on health; and particularly the impact noise has on sleep patterns with good evidence showing impacts over 30db. Vulnerable groups (for example children, the chronically ill and the elderly) are more susceptible and thus larger proportions in these areas are likely to be more effected. For the primary prevention of subclinical adverse health effects related to night noise in the population, it is recommended that the population should not be exposed to night noise levels greater than 40 dB, outside during the part of the night when most people are in bed.

Given, local populations, directly under the flight path, are amongst the most vulnerable, including a high proportion of children, we could only support night flight operation if mitigating measures ensured no-one was exposed to intermittent noise levels above 40db, as per European night noise guidance.

Vibration

As per the consultation, we would expect mitigating measures to be put into place to reduce the risk to health from both vibration and air quality (especially particulate air quality) during any build phase.

Air Pollution/Air Quality.

It is well known now that air pollution has a major attributable impact on the health of the population, and given the vulnerabilities is likely to have a greater attributable impact on populations closest to the airport. We would expect the airport operators, in conjunction with Thanet District Council Environmental Health department to ensure they have suitable air quality monitors in place to continually measure local air quality and to be taking real time remedial actions in order to reduce such impacts. We expect the airport operators to comply with all UK air quality guidance and additionally take into account NICE Air pollution: outdoor air quality and health guidance (<https://www.nice.org.uk/guidance/ng70>) in planning, and operating the airport as appropriate.

Health Impact Assessment

Additionally we would expect RiverOak Strategic Partners to conduct a participatory health impact assessment with local communities to ensure the development takes all possible opportunities to enhance the positive health impacts on the local community; and reduces the negative health impacts.

Ends

**Andrew Scott-Clark** | Director of Public Health | Kent County Council | Room 1.61, Sessions House, County Hall, County Road, Maidstone, Kent, ME14 1XQ | Internal 7200 416659 | External: +443000416659 | [www.kent.gov.uk](http://www.kent.gov.uk) | \_\_\_\_\_  
**\*\*Please note my new KCC phone number**

---

**From:** Marchant, Tom - GT EPE  
**Sent:** 12 July 2017 08:40  
**To:** Scott-Clark, Andrew - AH PH (Public Health)  
**Subject:** RE: Riveroak Manston Airport Consultation

Morning Andrew,

Yes – I would certainly like to if you have comments to make.

A whole range of consultation documents have been published and in the interests of your time, I would refer you to the attached in particular:

1. Preliminary Environmental Information Report. See Section 5.8 (p. 5-12) and paras. 5.8.1 - 5.8.6. Note the SoS view on the requirement for a HIA which you may have a view on.

2. Para. 5.8.6 refers to the effect of the proposal on public health in relation to air quality and noise. Chapter 6 (Air quality) can be found within the first attachment and I have attached Volume 3 which contains Chapter 12 (Noise).
3. The final attachment provides an overview of the proposal and summarises the PEIR including the chapters relating to air quality and noise.

If I can provide any further information to assist you then please let me know.

Regards,

Tom

**Tom Marchant** MRTPI | Head of Strategic Planning and Policy | Environment, Planning and Enforcement | Kent County Council | Invicta House, Maidstone, Kent ME14 1XX | Internal: 413412 | External: 03000 413412 | [www.kent.gov.uk](http://www.kent.gov.uk) | \_\_\_\_\_

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**From:** Scott-Clark, Andrew - AH PH (Public Health)  
**Sent:** 12 July 2017 08:12  
**To:** Marchant, Tom - GT EPE  
**Subject:** Riveroak Manston Airport Consultation

Tom

Was given your name by Barbara Cooper's PA; Thanet CCG have highlighted the Riveroak Consultation on reopening Manston Airport and have asked me to comment on health aspects. I believe you are co-ordinating KCC's response and wondered if you proposed to cover health aspects/impacts in your response?

Look forward to hearing from you

WBW

**Andrew Scott-Clark** | Director of Public Health | Kent County Council | Room 1.61, Sessions House, County Hall, County Road, Maidstone, Kent, ME14 1XQ | Internal 7200 416659 | External: +443000416659 | [www.kent.gov.uk](http://www.kent.gov.uk) | \_\_\_\_\_  
**\*\*Please note my new KCC phone number**



Samara Jones-Hall [REDACTED]

---

**Your Data Protection Concern[Ref. RFA0796035]**

1 message

Wed, Feb 6, 2019 at 2:15 PM

TO: [REDACTED]

6 February 2019

**River Oak Strategic Partners Limited Case Reference: RFA0796035  
Copper Consultancy Limited Case Reference: RFA0796036**

Dear Ms Jones-Hall,

We write further to our correspondence of 25 January 2019. I have now reviewed the supporting information which you have provided in relation to your data protection concern about Copper Consultancy ('CC'), case reference RFA0796036. I now feel that I have a greater understanding of the concerns you have raised about both CC and RiverOak Strategic Partners Limited ('RSP').

From the circumstances described in each case, we do not have reason to believe that the sharing of your personal data by RSP or CC was inappropriate. This is because, Article 6(1)(f) of the General Data Protection Regulation ('GDPR') gives organisations a lawful basis for processing where:

'processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.'

This can be broken down into a three-part test:

1. **Purpose test:** is the organisation pursuing a legitimate interest?
2. **Necessity test:** is the processing necessary for that purpose?
3. **Balancing test:** do the individual's interests override the legitimate interest?

On balance, it appears that the sharing of your personal data by RSP and CC was within their legitimate interest in addressing your concerns and your request for a hard copy of the DCO.

However, it does not appear that you were provided with privacy information when contacting and being contacted by RSP and CC. Therefore, we feel that it appears unlikely that RSP and CC have complied with the requirements set out by the data protection legislation. This is because, when looking into your data protection concerns about RSP and CC, we have found that both RSP and CC do not appear to have adequate privacy information which therefore does not appear to comply with the right to be informed under article 13 and 14 of the GDPR which specifies what individuals have the right to be informed about.

In view of this, we have written to both organisations in order inform them of our assessment in this case and to provide advice and guidance about the right to be informed.

Please note, we now consider this case closed. However, should you have any further concerns or comments, please do not hesitate to inform us as such.

If you are responding via email, you can forward your response to our [casework@ico.org.uk](mailto:casework@ico.org.uk) email address with the above case reference in this format [Ref. RFAXXXXXX] in the subject line.

Yours sincerely,

Natalie Davies  
Lead Case Officer  
Information Commissioner's Office  
0330 414 6521

For information about what we do with personal data see our [privacy notice](#)

# Thanet District Transport Strategy 2015-2031

**Draft Version 2  
July 2018**



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**Foreword**

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## Introduction

This Strategy replaces the former Thanet Transport Plan (2005). Its purpose is to provide a framework of transport policy to the year 2031 to support planned growth within the Thanet District. The draft Strategy is the result of joint working between Kent County Council and Thanet District Council.

The main objectives of this Transport Strategy are to:-

1. Provide a policy framework for the district which is consistent with existing National and Regional policy.
2. Support delivery managed growth identified within Thanet District Council's emerging Local Plan
3. Identify a package of robust transport improvements and interventions to enable the highway network to effectively accommodate the likely increase in travel demand across the plan period.
4. Propose a funding and delivery mechanism for identified interventions and actions.



The strategy will be subject to periodic review throughout its lifetime. Whilst review points are not fixed they could be triggered by a number of internal/external factors. These factors include changes in local/national policy, additional transport/modelling data and a change in the funding environment for infrastructure. The current infrastructure funding environment is challenging, particularly in areas where property prices are lower (hence development land being less profitable). There are also many other competing priorities for supporting infrastructure to manage growth. Therefore it is important to maintain a level of realism in relation to the affordability of development whilst providing a robust policy and evidence base to support future funding and investment opportunities.

This strategy is both ambitious and realistic. It will require a strong level of partnership working and collaboration between Kent County Council and Thanet District Council in order to ensure that it effectively delivers and meets the future needs of the local highway network and its many users.

If you would like to discuss any aspect of this Strategy, please contact us at:

Strategic Planning  
Thanet District Council  
PO Box 9  
Cecil Street  
Margate  
Kent, CT9 1XZ  
Telephone: 01843 577591

**Email: [local.plans@thanet.gov.uk](mailto:local.plans@thanet.gov.uk)**

## Executive Summary

The Thanet District Local Plan provides a strategy to deliver 17,140 new dwellings and 5000 new jobs in between the period 2015–2031. This figure is in line with objectively assessed needs (OAN) as prescribed in national planning policy guidance. This Transport Strategy outlines the framework for a range of transport interventions and strategies to support growth and provide a more resilient local highway network to serve future generations.

The aim of the strategy is to balance the needs of all road users, providing reliable journeys within the highway network through a package of new and improved highway routes, whilst not losing sight of core sustainability principles that are central to current planning policy and good public health.

There are four key themes that are prevalent within this strategy and these are outlined in **Figure 1**.

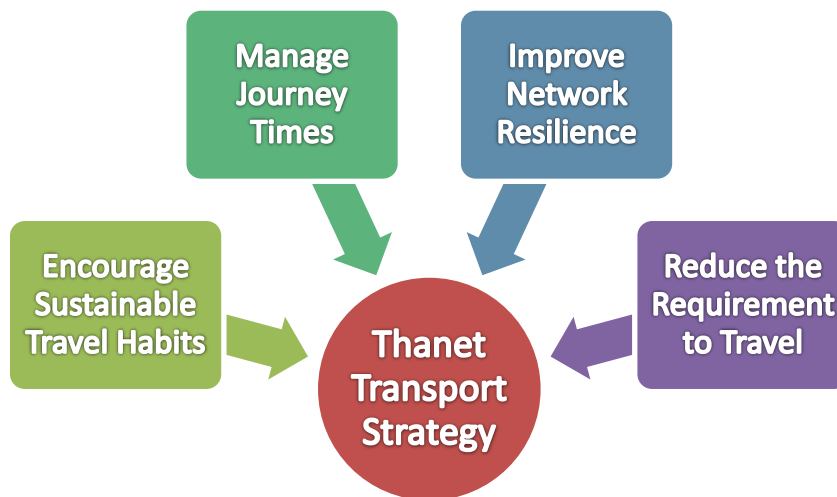


Figure 1 - Key themes of the Thanet Transport Strategy

In order to satisfy the above themes, the following interventions have been identified:-

### Encourage Sustainable Travel Habits

- Introduction of new cycle and pedestrian routes.
- Improvements to existing cycle and pedestrian routes.
- Extend and improve access to bus travel through increased frequency and network coverage.
- Implement improvements to the highway network to improve bus journey time reliability.
- Provision of a new Thanet Parkway Rail Station at Cliffsend.
- Ensure that new and existing bus infrastructure is delivered or renewed with easy access in mind.
- Ensure that developments provide and have access to appropriate walking and cycling facilities.
- Car Parking Strategy

### **Manage Journey Times**

- Provision of new & improved inner highway routes to complement existing primary road network.
- Localised junction improvements to improve traffic flow and levels of service.
- Reduction in the need to travel

### **Improve Network Resilience**

- Provision of new & improved inner highway routes to complement existing primary road network.
- Improve journey time reliability within the local road network by providing new link roads and junction improvements to avoid congestion.
- Improved directional Signage

### **Reduce The Requirement To Travel**

- Promotion of mixed use development where appropriate.
- Robust Travel Planning Measures to be implemented for new developments.
- Encourage Car Sharing.
- Improved communication infrastructure (High Speed Broadband)

The above actions will provide a framework to improve journey time reliability, whilst providing residents with a choice of travel modes, making essential journeys to key destinations, accessible by a range of travel modes.

The vision underpinning the Transport Strategy is as follows:

**By 2031 Thanet will have a safe, accessible, affordable, sustainable, reliable and integrated transport network incorporating improved road, public transport, cycle and pedestrian routes.**

**The transport system will empower people to make informed choices about the way they travel, and facilitate economic growth, and social and environmental improvements across the district.**

**This will be reflected in a shift to more sustainable travel patterns and modes, a healthier population and a competitive low carbon economy. Whilst also making provision for essential private vehicle based journeys.**

## 1 Introduction

### 1.1 Role and Purpose of the Transport Strategy

- 1.1.1 This Transport Strategy provides a framework to guide the development of transport based improvements and interventions within the Thanet District for the period up to 2031. It identifies priority schemes and projects that are deliverable, but whose implementation will be dependent on the rate of development coming forward, viability and the availability of resources. It is therefore a fluid document which can be adjusted in accordance with changing circumstances.
- 1.1.2 It will be used to facilitate effective engagement with stakeholders at both a national and local level, provide a policy position for transport improvements, and support associated funding bids. It is being prepared jointly by Kent County Council and Thanet District Council and has been one of many considerations when appraising the proposed the scale and location of strategic allocations as part of the emerging Local Plan.
- 1.1.3 This strategy will support, guide and be developed further through revisions to future Local Transport Plans (LTP) and the Local Plan. It seeks to achieve a balance between a range of transport and development issues at local and strategic level. The horizon period for the strategy is 2031, which is consistent with the emerging Local Plan. This strategy supports expected economic growth, it is not intended to represent an exhaustive list of all transport interventions desired within the District by local stakeholders.
- 1.1.4 Each significant development site will be expected to appraise its own specific highway impacts whilst contributing to this overarching strategy in line with an accompanying Infrastructure Delivery Plan (IDP).

### 1.2 Policy Context

- 1.2.1 Thanet District Council recognises the importance of working closely with Kent County Council to prepare a District Transport Strategy to improve transportation and parking to benefit business, residents and visitors.

Areas of focus include:

- Management of traffic flow and road safety within the district.
  - Parking offer to residents and visitors alike.
  - Identifying infrastructure needed to enable smooth travel to key destinations.
  - Widening choice in relation to means of travel including measures to improve attractiveness and convenience of public transport, cycling and walking, car clubs and charging points for electric and hybrid cars.
  - Managing air quality issues.
- 1.2.2 The District Council's Local Plan will set out a long term strategy to accommodate new housing, job creation and other development in a sustainable way. A Transport Strategy has a key role in informing and complementing the Local Plan, and will be integral to the delivery of the plan as intended.

- 1.2.3 This Transport Strategy includes a high level appraisal of the transport network and addresses the local and wider transport and infrastructure implications arising from associated development sites with development options being tested. It identifies strategic transport issues, key infrastructure requirements, and specific transport improvement and initiatives, whilst taking account of relevant policy at both a local and national level.
- 1.2.4 The outgoing Thanet Transport Plan set a number of actions to be completed. These actions and the achievements, as a result of the 2005 plan, are summarised in **Appendix A**.
- 1.2.5 There are a number of national, county and local strategies, plans and policies that will influence or be influenced by this Transport Strategy. These include:
- The National Planning Policy Framework (March 2012)
  - Local Transport Plan for Kent 2016-31
  - The Evidence Base of the Emerging Thanet Local Plan.
  - Rail Action Plan for Kent
  - Freight Action Plan for Kent
  - Thanet Air Quality Action Plan
  - Thanet Cycling Strategy
  - Feet First Walking Strategy
  - Vision for Kent
  - Bold Steps for Kent
  - Growth & Infrastructure Framework (GIF)
  - KCC Road Casualty Reduction Strategy
  - KCC Active Travel Strategy
  - Countryside and Coastal Access Improvement Plan 2013 – 2017
  - KCC's emerging Energy and Low Emission Strategy

#### Local Transport Plan 4 (2016-2031)

- 1.2.6 The preparation of a Local Transport Plan (LTP4) is a statutory requirement of Local Transport Authorities in England. It is intended to outline policies and provide a delivery plan to manage and enhance the local transport network. A LTP is intended to reflect and support District Local Plans, as such they are reviewed on a regular basis to ensure that they align with local planning policy and evolving land use scenarios throughout the county and district.
- 1.2.7 LTP4 was recently adopted by KCC and provides a county plan for the period 2016-2031.
- It consists of five high level themes.
1. Economic growth and minimised congestion
  2. Affordable and accessible door-to-door journeys
  3. Safer travel
  4. Enhanced environment
  5. Better health and wellbeing
- 1.2.8 Whilst LTP4 provides a high level strategic overview of priorities at a county and district level, this Transport Strategy focusses on Thanet in more detail. **Figure 1** outlines the currently identified transport priorities within Thanet as set out in LTP4.

Transport Priorities for Thanet

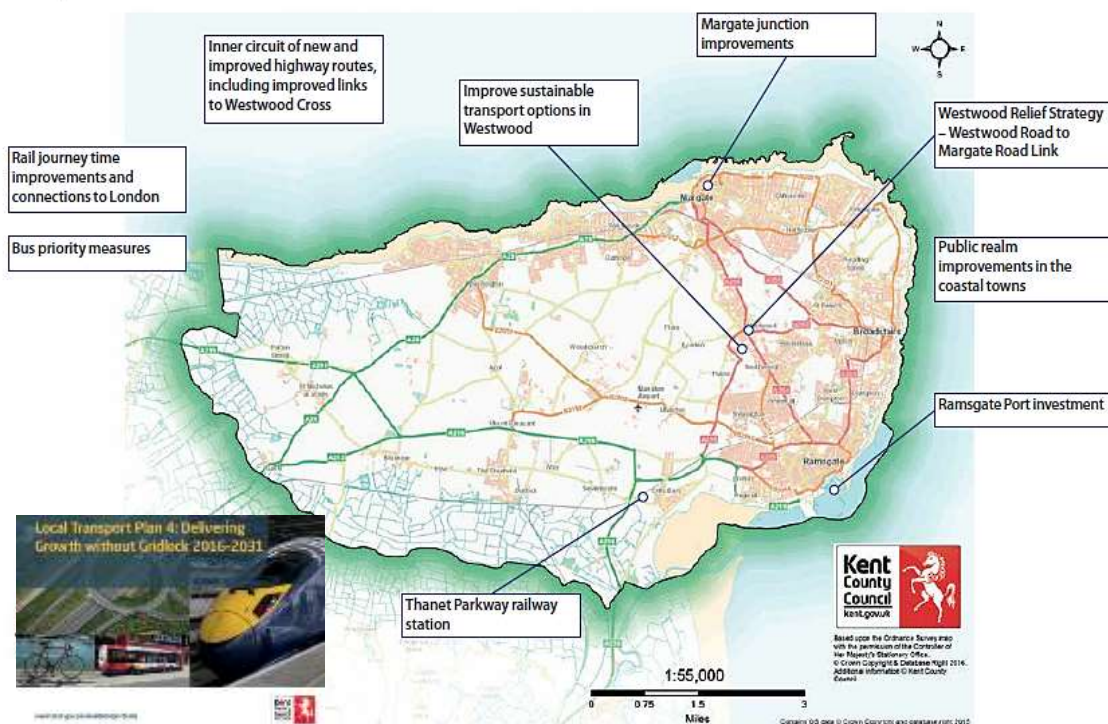


Figure 1 - LTP4 Transport Priorities for Thanet

1.2.9 Other Policy considerations are summarised in **Appendix B**

### 1.3 Roles and Responsibilities

- 1.3.1 Kent County Council is the strategic Local authority for Kent with a statutory role providing a comprehensive range of services as the Local Transport Authority. It has a responsibility for all non-strategic highway routes within the county, which equates to 5,400 miles of carriageway and 3,900 miles of footway.
- 1.3.2 Amongst a number of maintenance related activities in relation to the highway asset and planning of public transport, KCC plans and delivers highway improvement scheme leads on infrastructure funding bids to government in collaboration with TDC.
- 1.3.3 In terms of highway and transport matters, Thanet District Council is responsible for the enforcement of on and off street parking (under the Traffic Management Act 2004). TDC are also responsible for a number of public car parks, street cleaning, bus shelters and the monitoring of air quality.
- 1.3.4 Officers at KCC and TDC enjoy close working relationships, which seek to ensure that district and county transport priorities are aligned. This is evident through regular stakeholder meetings, such as Local Quality Bus Partnerships (QBP), which involve stakeholders (including members) from both KCC and TDC.



## 2 Geographical Context

### 2.1 Local Geography

- 2.1.1 Thanet is located in East Kent, and is surrounded by sea on three sides. It comprises three main coastal towns Margate, Broadstairs and Ramsgate. It incorporates a number of attractive coastal and rural villages.
- 2.1.2 The geography of the area results in a very self-contained road network, as such highway routes into and out of the district is currently geographically limited. Whilst coastal towns remain integral to the economic prosperity of the district, Westwood represents the core Retail and Leisure destination for many residents.



Figure 2 - Map of Thanet's Location

- 2.1.3 Historically, Thanet has suffered from a perception that it is isolated from London and the rest of the country, being 75 miles from central London and 56 miles from the M25/Dartford Crossing. However, new and improved transport infrastructure is helping to change this perception. Initiatives such as the A299 East Kent Access Road at Cliffsend, improvements to the road network in Westwood and High Speed 1 Rail Links have had a positive impact on highway accessibility.
- 2.1.4 Thanet is now becoming a place where people seek to live and work and businesses invest. Tourism has always represented an important element to the local economy; with coastal towns being popular tourist destinations, particularly during summer months. As such the local highway network is subject to differing patterns of travel through seasonal peaks.

### 3 Spatial Characteristics

#### 3.1 Social, Economic and Environmental Character

- 3.1.1 Thanet's estimated population at 2011 was 134,400. Work undertaken on population projections to 2031 to inform housing needs indicates an estimated population of 161,527 at that date.
- 3.1.2 The economy of East Kent is generally less buoyant than other areas of the county. This is partly due to perceptions of parts of it being peripheral with historically slow transport links to London. However, a number of regeneration projects and initiatives are in place and serving to diversify the employment base; for example the location of the Turner Contemporary gallery in Margate and the introduction of access to High Speed rail services within the district.
- 3.1.3 Furthermore, the economy has been growing and diversifying in recent years, and the Council, working in partnership with business, has set an ambitious Economic Growth Strategy for the area. The Council is working with business and other key partners to implement the Strategy.
- 3.1.4 Most of Thanet's coastline is designated a Site of Special Scientific Interest (SSSI), a Special Area of Conservation or a Special Protection Area. Areas at risk of flooding are mainly restricted to the lowlands of the former Wantsum Channel and a small area of Margate Old Town. Some of these designations are shown in **Figure 3**.
- 3.1.5 There are 20 Conservation Areas within Thanet, which include areas of special architectural or historical interest. In addition there are around 2,500 listed buildings in the district. In order to preserve the character of Conservation Areas interventions to manage traffic, such as road markings and signage require sensitive consideration. This is expressed in the District's Conservation Area Management Plan (2008)<sup>1</sup>.

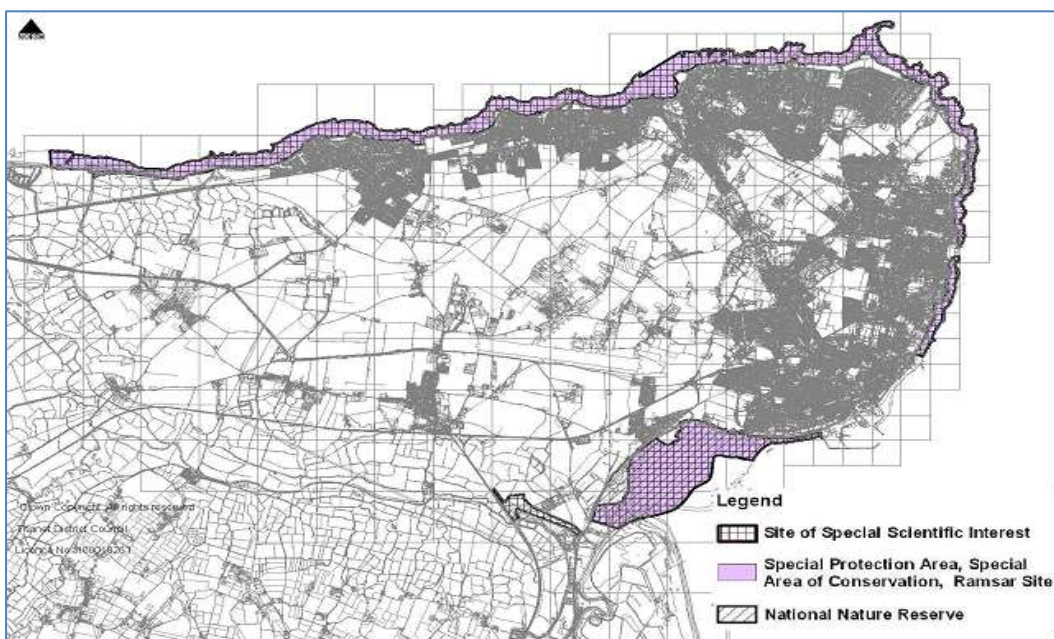


Figure 3 - Designations in Thanet

<sup>1</sup> [http://www.thanet.gov.uk/pdf/Conservation\\_Areas\\_Management\\_Plan2008.pdf](http://www.thanet.gov.uk/pdf/Conservation_Areas_Management_Plan2008.pdf)

- 3.1.6 There are two junctions in Thanet which show levels of nitrogen dioxide (NO<sub>2</sub>) exceeding the recommended health objective, in both cases due to road transport emissions. These junctions are at The Square, Birchington, and High Street St Lawrence, Ramsgate.
- 3.1.7 It was found that Heavy Duty Vehicles (Heavy Goods Vehicles plus buses) contribute disproportionately to poor air quality. For example, at The Square HDVs produced a third of emissions of nitrogen oxides but were less than 5% of traffic<sup>2</sup>.
- 3.1.8 In November 2011 an urban wide Air Quality Management Area (AQMA) was created and this includes both junctions (figure 4). This is because the two existing Areas are intrinsically linked to the road network across the wider district and by covering all heavily trafficked areas a coherent strategy can be developed. The one AQMA will then cover areas that will potentially exceed acceptable limits in the future.

## 3.2 Settlements

- 3.2.1 Thanet includes the three main coastal towns of Margate, Ramsgate and Broadstairs. These together with the smaller settlements of Westgate on Sea and Birchington on Sea are located within an almost continuous urban belt, with limited sections of green separation between some of them. Within the District's rural area there are seven villages of varying size, each having its own individual character. The furthest of these is about 5 km from the urban area containing the towns.

## 3.3 Margate

- 3.3.1 Margate is a popular tourism resort and has a strong cultural and creative community. The "Dreamland" amusement park has reopened featuring historic rides, including the scenic railway, and other attractions, and also hosts events, such as nationally recognised music concerts.
- 3.3.2 Margate Railway Station is a short distance from the Margate main sands and gives direct access on foot to the seafront and its amenities. In March 2010, Jacobs was commissioned by Kent County Council to develop a conceptual master plan for improvements to the public realm of Margate Seafront and Station Approach<sup>3</sup>. The main features are to include:
- A less dominant highway environment with reduced road widths and highway furniture throughout
  - A series of new and improved public spaces along the frontage
  - Controlled pedestrian crossing points at key locations along the frontage
  - Widened pavements and promenade where possible

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<sup>2</sup> [http://www.thanet.gov.uk/pdf/Thanet\\_AQAP\\_2011\\_DRAFT.pdf](http://www.thanet.gov.uk/pdf/Thanet_AQAP_2011_DRAFT.pdf)

<sup>3</sup> Margate Seafront & Station Approach Public Realm Improvements Scheme Development & Stakeholder Engagement Report

- 3.3.3 Margate town comprises narrow streets with properties fronting directly on to the road, many of which fall within conservation areas. Some of these streets are too narrow to safely accommodate two way flows and consequently follow a one-way system. The streets follow a comprehensive grid layout which offers good connectivity on foot and makes walking between key destinations in the town likely to be quicker than the car. Some of the existing pedestrian crossing points over the major arterial routes are located just off of the walking desire line which can sometimes result in additional interruptions to the free flow of traffic.
- 3.3.4 The Turner Contemporary has dramatically increased visitor numbers to the town but does not have on-site parking provision. Parking for the gallery is located in College Square, some 0.6km from the site and is accessed via a walk through Margate Old Town. The increased footfall in this area has had a significant effect on the commercial viability of the Old Town with more than 35 new businesses having opened in the first 18 months after the opening of the gallery (April 2011) and existing shops reporting a significant increase in takings.
- 3.3.5 Car parking can significantly influence the success of a town centre. KCC undertook a car parking survey in 2007 over a bank holiday weekend to assess the availability and utilisation of car parking within the town centre. Margate was found at that time to have 847 on street parking spaces of which an average of 69% were utilised during the week and 64% at weekends. There are 1,795 off street parking spaces of which 52% on average were utilised during the week and 26% at weekends. It is clear that parking capacity was abundant at that time but with the success of the Turner Contemporary and the upsurge of the Old Town a new Parking Strategy has been called for to take account of future regeneration projects.
- 3.3.6 The Queen Elizabeth the Queen Mother hospital is located on the edge of the town which is a facility that serves a large proportion of East Kent, bringing with it associated trips from outside of the district.

### **3.4 Broadstairs**

- 3.4.1 Situated on the Thanet coastline between Margate and Ramsgate, Broadstairs is a popular holiday destination and has an array of festivals held throughout the year attracting tourists and locals to the town and seafront, whereby the main streets are closed to traffic. Its position in the district means that trains to London can go in either direction, via Canterbury or via Margate.
- 3.4.2 Due to its status as a thriving tourist location, peak season visitor parking needs to be reviewed and this could be done as part of a wider parking strategy for Margate, Broadstairs and Ramsgate.

### **3.5 Ramsgate**

- 3.5.1 Home to the Royal Harbour Marina (just 35 miles from the French coast) and a member of the ancient confederation of Cinque Ports, Ramsgate is connected to the national road network primarily through the A299 Thanet Way and along the A256, East Kent Access Road, to Dover (and onwards to the Channel Tunnel), to which improvements have recently been completed.

- 3.5.2 Serving fishermen and yachtsmen, the Marina is also a tourist site. The town's Royal Harbour is unique in the UK and, like Broadstairs, the economy is underpinned by the tourist industry. Much of the town is Regency and Victorian and there are around 900 listed buildings.
- 3.5.3 The Port of Ramsgate has an access tunnel from outside of the town thereby avoiding town centre congestion except for times when this link is closed for maintenance.

### 3.6 Westwood

- 3.6.1 This area is located at the centre of the district, at the intersection of the A254 and A256. Westwood now represents the District's principal retail centre. It is also gradually developing into a residential settlement. The EuroKent site, which was originally allocated for employment, has recently been granted consent to build 550 new homes within the application site in addition to the 1000 new homes planned for Land North Of Haine Road. Recent improvements to the road network in the area have almost created a "loop" around the core shopping area, and this has led to improved traffic flows in the locality.



Figure 4 - Westwood Roundabout (A256/A254)

## 4 Existing Transport Network

### 4.1 Road

- 4.1.1 Thanet is well connected to the UK motorway network via the A299 Thanet Way (a dual carriageway), which in turn links the District to the M2. The East Kent Access Road (A256/A299) creates a high quality road connection to surrounding principle road corridors, which in turn link Thanet to the strategic road network (SRN) of the A2, M2 and M20 which are managed by Highways England.
- 4.1.2 The A28 (Canterbury Road) links Margate, Westgate on Sea and Birchington into Canterbury District and on to Ashford before ending on the East Sussex border. The A254 (Ramsgate Road) and A255 (St Peters Road) connect Margate, Ramsgate and Broadstairs. The A254 and A256 between Margate Ramsgate and Broadstairs serve as inter urban routes with Westwood being located at the point where these two routes intersect.

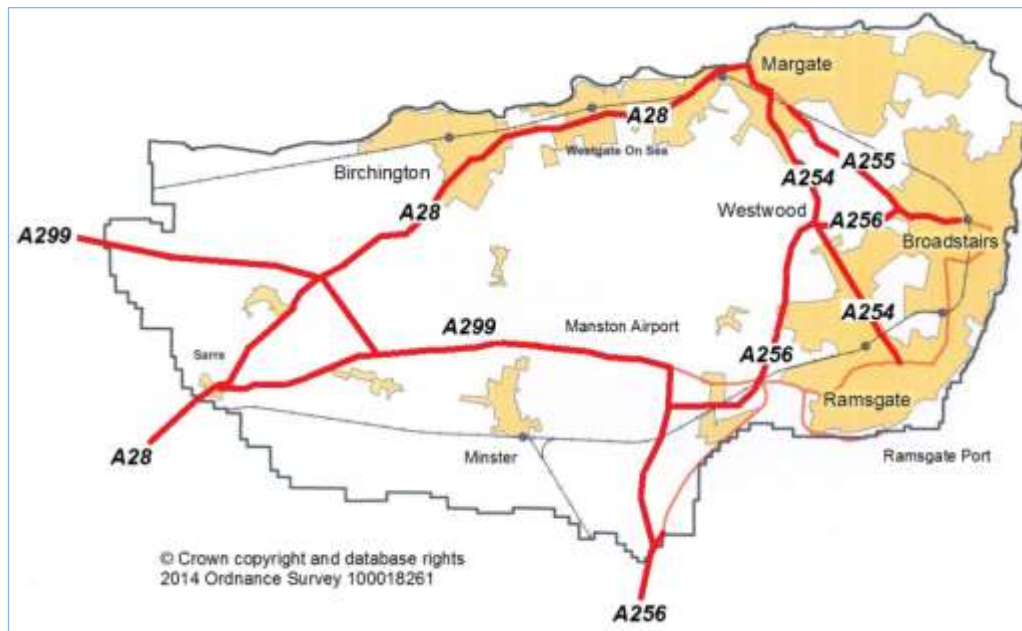


Figure 5 - Principal Road Links Around Thanet

- 4.1.3 All adopted public roads in Thanet are managed and maintained by Kent County Council as the highway authority. Those under KCC's responsibility can range from principal 'A' roads to the dense urban networks and rural lanes.

### 4.2 Rail

- 4.2.1 Thanet is currently served by seven railway stations and has direct services to London, Canterbury, Ashford and Dover. In December 2009 High Speed One services commenced from Ramsgate to London St. Pancras reducing rail journey times to 1 hour and 16 minutes (figure 5). For purposes of comparison, the mainline journey time to London Victoria is around 2 hours and to London Charing Cross up to 2 hours and 30 minutes.

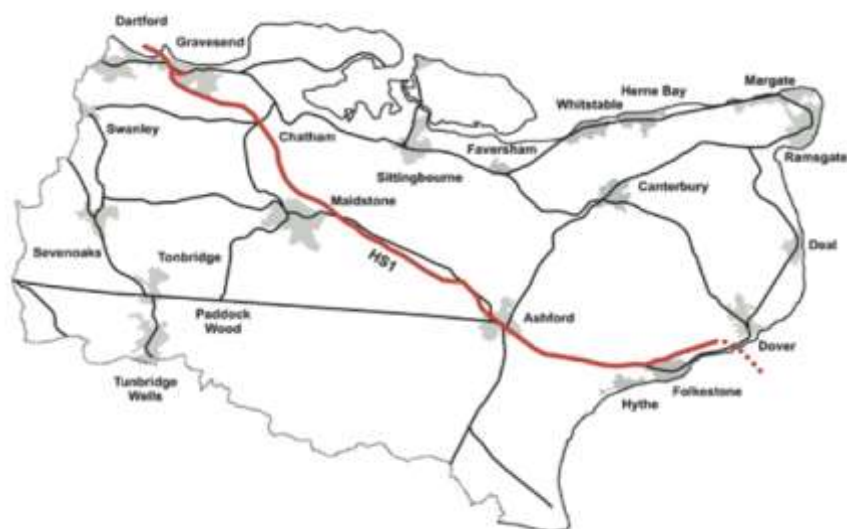


Figure 6 - The Kent Rail Network

4.2.2 The three principal stations are Ramsgate, Broadstairs and Margate with routes in three directions:

- London via Faversham and Chatham
- London via Canterbury and Ashford
- Dover and Folkestone via Sandwich

4.2.3 Parking availability at Thanet's existing rail stations is generally poor, which has an impact on the attractiveness of this form of transport for the local population. The delivery of a new Parkway Station at Cliffsend would provide high quality and convenient parking offer improving the attractiveness of rail travel.

4.2.4 The Kent Route Utilisation Strategy (January 2010) is Network Rail's strategic vision for the railway up to 2020, it has two possible areas for improvement in Thanet:

- Cutting journey times from London St Pancras to North Kent (Thanet via Medway) to promote economic growth. Current journey times are restricted by line speeds in Gravesend and Medway and the number of stations served on the route.
- The possible provision of a new Thanet Parkway station to assist in economic regeneration in Thanet, and improve connectivity with Discovery Park (just in Dover district), which provides a significant source of employment for Thanet residents.

4.2.5 In January 2012 the East Kent Resignalling Project was completed on routes from Sittingbourne to Minster via Ramsgate and from Faversham to Buckland Junction via Canterbury East. This renewed the existing equipment, which dated from the 1950s.

### 4.3 Bus

- 4.3.1 Approximately 97% of the local bus network in Thanet is provided on a commercial basis predominantly by Stagecoach. Some services are subsidised by KCC where it is considered there is a social need not met by the commercial network. KCC has clear criteria to help identify which services receive subsidy. These mainly include rural, evening and weekend services providing access to education, food shopping, health care or employment.
- 4.3.2 Thanet's predominant bus service provider Stagecoach is one of the largest operators in the UK and currently operates throughout East Kent. The introduction of the 'Thanet LOOP' in October 2004 was an immediate success and the existing Margate and Ramsgate local services the 'Thanet STARS' were upgraded as a result to complement it.
- 4.3.3 In an era when many districts have seen a net fall in the number of bus passengers (despite the introduction of free travel for over 60s), this is a remarkable achievement. Stagecoach in East Kent reports that bus use in the Thanet District since 2004 has been as follows:

Year	Passenger boardings per year commencing 1 <sup>st</sup> April
2004	4,157,610
2005	5,313,565
2006	6,358,351
2007	6,761,854
2008	7,288,773
2009	7,469,328
2010	7,737,112
2011	7,957,379
2012	7,824,858
2013	8,167,933
2014	Data Unavailable
2015	8,973,879
2016	8,850,442

- 4.3.4 As referred to above, a key reason behind this transformation was the re-casting of the local bus network using DfT Kick Start funding and investment from Stagecoach to create a new route called 'The Thanet Loop'. This offered modern accessible vehicles providing a frequent service on a simple route connecting the main town centres and the new development at Westwood Cross. Its introduction was backed with an extensive marketing campaign.
- 4.3.5 It has been developed with improvements to frequency, length of operating day and investment in a new fleet of larger vehicles with improved engines for better efficiency and lower emissions. Other commercial routes have also received similar improvements, with the 8/8A service in particular benefitting from an investment of £2.5million in new Euro 6 double deck buses in 2016 and revisions to the routes created new links across the district.



Quality Bus Partnership (QBP)

- 4.3.6 All bus routes within Thanet are supported by an established QBP between three partners – the commercial bus operator (Stagecoach), Kent County Council and Thanet District Council. This group meets quarterly and includes attendance by council members from both Local Authorities.
- 4.3.7 The purpose of the QBP is to co-ordinate all matters which might affect bus operation, including potential investment opportunities, which could range from new bus stock, localised highway improvements to complement bus routes to new highway infrastructure associated with new development proposals.



Figure 7 - QBP Roles

Young Persons Travel Pass/16+ Travel Pass

- 4.3.8 This is a concessionary scheme to assist parents with the cost of travel to and from school and evolved from the Kent Freedom Pass introduced in 2009. The current cost of the pass is £280 (£400 for the 16+ pass) and allows for travel between the hours of 6am and 7pm (at all times 16+ card).
- 4.3.9 The County Council currently issues just over 24 000 YPTP passes and 6500 16+ passes across Kent, this underlines KCC’s ongoing commitment to reducing congestion especially at peak times. From September 2017 Stagecoach has launched a new initiative which allows for YPTP passes to be accepted at all times of the year and on all evenings and at weekends.

English National Concessionary Travel Scheme (ENCTS)

- 4.3.10 KCC administers this nationwide scheme in Kent for disabled people and those who have reached the state pension age. This allows for free travel between the hours of 0930 and 2300 Monday to Friday and anytime on Saturdays and Sundays.

Bus Stop Infrastructure

- 4.3.11 KCC hold overall responsibility for bus stop infrastructure in Thanet and across Kent overall. A contract is in place for the maintenance of existing bus stop assets and the Authority also considers requests for new bus stops and for the re-location/adaption of existing bus stops.
- 4.3.12 In Thanet, Stagecoach are proactive in assisting with the management of bus stops on their commercial corridors, performing the maintenance and repair

function (cases and flags) for the sites in question. It is important that bus stop infrastructure is considered as part of the planning process and that a) bus stop locations are identified early on within developments and b) appropriate financial contributions are included. More widely it is also important that developments consider bus access with respect to their design, for instance with respect to turning circles, road widths etc.

- 4.3.13 The original Thanet Loop scheme intended to make as many bus stops as possible fully accessible to support the new accessible buses being provided. The on-going development of bus infrastructure within Thanet has been a key component in the development of the existing network.
- 4.3.14 Bus shelter maintenance falls under the jurisdiction of TDC and this is currently administered through a term contract with the private sector, which devolves the responsibility for maintenance to the private sector with added revenue from relevant stops forming the funding stream to make this commercially viable. The current maintenance contract is reaching end point, and the delivery of good quality infrastructure will form part of future negotiations during 2017/2018. It is essential for any future contract to include a level of flexibility to enable new shelters to be provided within new development sites.



#### 4.4 Community Transport

- 4.4.1 Thanet Community Transport Association provides accessible minibuses for residents who are unable to use other public transport. This is a door-to-door dial-a-ride service timetabled to operate to/from selected destinations each day.
- 4.4.2 Kent Carrier Service – Is a flexible dial a ride service that takes members directly from their door to useful destinations in their local area. All services are operated with wheelchair accessible vehicles and trained drivers. The scheme provides for those with a mobility impairment/medical condition, who live more than 500 metres from a bus stop/railway station or who are over 85 years of age.

## 4.5 Sea

- 4.5.1 Ramsgate Port has facilities for handling freight and passengers and is operated by Thanet District Council. These facilities include the ability to handle Roll on – Roll off (Ro Ro) vessels up to 175m and 6.5m draft, dedicated warehousing for transshipment and storage, and coach, car and foot passenger handling. In addition Ramsgate Marina also enables private vessels to be moored.
- 4.5.2 The previous operator of Cross Channel ferry services to both Dunkerque and Ostend ceased trading in May 2013 and a new operator is being actively sought. The Port has become a construction and operation base for three nearby offshore wind farms and the Council is currently exploring a range of freight and other operational options for the Port.
- 4.5.3 It has good connectivity with a dedicated Port access road and tunnel that diverts traffic away from the town and delivers customers direct to the Port. Because the route from the M25 to the Port of Ramsgate does not rely upon the M20/A20 corridor it is largely unaffected by the long delays which result from the implementation of Operation Stack.
- 4.5.4 With space for up to 550 freight units on site, specialist logistical equipment and storage areas only metres from the berth, turnarounds can be kept short. A focus on pre-booked, just in time services that are not affected by seasonal traffic variations guarantee customers can get to the Port without delays, providing a cost-effective way forward for the European freight distribution market.
- 4.5.5 The Port has an existing capacity of 500,000 units and the potential for up to one million. Cross channel freight is already expected to increase by 1.43 million units per year by 2035, and the Port of Ramsgate can play a significant part in providing additional capacity. This would give increased resilience to the European logistics market and support the flow of traffic across the South East of England especially the Thames corridor and would potentially link into the third Thames crossing, diverting traffic east rather than south to Dover and the Channel tunnel.
- 4.5.6 The Port has a strong vision for phased future development starting with a new double deck linkspan berth. This would give the Port a second double deck berth that would improve resilience whilst unlocking significant additional capacity and the Council has started to develop the business case to bring this forward.
- 4.5.7 The second phase would include the development of a logistics hub at Manston Business Park. This would provide additional off-port vehicle storage to act as a pre-parking area, supporting the maximum capacity of one million units. The hub would also incorporate storage facilities to allow for post and pre-assembly for loads for onward transport and units for advanced manufacturing.

## 4.6 Walking

- 4.6.1 Thanet has a road network which largely accommodates footways on both sides, not only in the main towns and seaside settlements but also along the distributor routes connecting them. In the rural areas the Public Rights of Way network offers walkers (and sometimes horse riders and cyclists) a good connection across open countryside to the coast, rural settlements and end destinations, with some circular walks offering superb views of both coast and countryside combined. The Thanet Coastal Path follows the longest stretch of chalk coastline in the country, the route having been set up in the 1990s. The Viking Coastal Trail is good for beginner walkers, offering good views out to sea. There are other signposted walks in Thanet, including the Turner and Dickens Walk linking Margate and Broadstairs.
- 4.6.2 In 2005 “Feet First,” a local walking strategy for Thanet was published. This identifies barriers to walking in the District and aims to promote and enable walking, for example by specifying a network of routes for improvements.
- 4.6.3 KCC’s Countryside and Coastal Access Improvement Plan 2013 is the overarching policy document for improvements to network of Public Rights of Way and recreational walking access in Kent.
- 4.6.4 Active Ramsgate is a recently completed partnership project from Ramsgate Town Council and Explore Kent to help develop Ramsgate Town as a destination for walking and cycling. The project included a number of promoted self-guided walks and the establishment of three new walking trails; ‘The Contra Trail’, ‘See it all’ and ‘Ramsgate Town Rounders’. On the back of this initiative Ramsgate Town is applying to be a ‘Walkers Welcome’ town. The Turner and Dickens Walk and Thanet Coastal Path provide longer distance promoted trails. All promoted routes have accompanying maps and leaflets that provide all the information you need for an enjoyable day out. For further information see - Parks and outdoor activities - [kent.gov.uk](http://kent.gov.uk)
- 4.6.5 Following the Marine and Coastal Access Act 2009, Kent has been working with Natural England to establish its section of the emerging “England Coast Path” national trail. Establishment of sections from Folkestone to Whitstable are a key part of that initiative, although the focus of walking remains in and around the Coastal Promenades there is wider network of Public Rights of Way of around 106km.

## 4.7 Cycling

- 4.7.1 The Viking Coastal Trail (27 miles) roughly encircles the former Isle of Thanet providing connections between the towns, leisure and heritage attractions, as well as the National Cycle Network. Other routes have designated facilities to make cycling more attractive, such as the shared use footway/cycleways adjacent to New Haine Road. The provision of toucan crossings and facilities such as cycle parking at key locations (e.g. stations and shopping centres) also helps to improve the attractiveness of cycling in the district.
- 4.7.2 There is an existing Thanet Cycling Plan dated December 2003, with many of the targets within this document having already been achieved, notably:
1. The completion of the Viking Coastal Trail (VCT) in June 2001, linking Thanet’s town and villages together with a 45km (28 mile) circular route and joining them to the National Cycle Network.

2. The continuing review of the VCT, improving signage and surfaces on the route, using funds from the Connect 2 project to complete the circular route and maintain it as an asset for Thanet.
3. Improvement of road junctions, Westfield Road/Caxton Road/Maynard Avenue/Brook Avenue/Crow Hill Road to reduce traffic speeds and give better access to pedestrians and cyclists
4. Construction of Dane Valley cycle route linking Marine Drive, Margate to Vicarage Street, St Peters and linking into the safer routes to school scheme.
5. Scheme to reduce traffic speeds at Nethercourt Hill, Canterbury Road East, High Street, Margate, Reading Street, Albion Street, Broadstairs and on various estate roads in Thanet with links to encourage more walking and cycling.
6. Cycle links from Margate Station and Broadstairs Station have been revised and improved.
7. The building of safe crossing facilities on Westwood Road fronting St George's C of E School.
8. Cycle route connections at Westwood, in the vicinity of Westwood roundabout.
9. New cycle path connection between A253 Minster and Sandwich Road Cliffsend to connect into NCN1.

## 5 Key Transport Challenges and Options

- 5.1.1 The purpose of this strategy is to manage growth within the district, whilst providing an improved quality of life for Thanet's residents by addressing key transport related challenges.
- 5.1.2 For most road users, congestion and delay is the biggest issue related to transport, with previous studies suggesting that congestion was a problem for the majority of the time when undertaking general road journeys<sup>4</sup>. It has also been forecast that, based on recent patterns of car usage, the housing growth planned for Kent could result in an extra 250,000 car journeys on the county's roads every day<sup>5</sup>
- 5.1.3 There is a general recognition that car ownership is the largest single component of traffic growth, with journeys to and from work and for educational purposes being one of the biggest contributors to peak hour road congestion.
- 5.1.4 Statistical data from the 2011 census identifies that whilst Thanet is geographically smaller than other districts within Kent, the number of households are comparable. The level of private vehicle trips in the district is commensurate with the national average. It is relevant to note that the percentage of bus use is the second highest in Kent, which suggests that existing bus services are a feasible option for existing residents.

### 5.2 Existing Travel Patterns

- 5.2.1 To gain a perspective on current and future transport demographics, it is valuable to examine existing sources of data in relation to Transport matters. Data sourced from the 2011 census provides some insight into the current travel habits of Thanet Residents when compared to local and national trends. **Figure 8** outlines the percentage of the resident population at different levels of car/van ownership in the District.
- 5.2.2 This data suggests that 30% of the district's population live in households with no cars/vans compared to just 20% for the whole KCC area. The average car ownership across the district is the lowest in the county
- 5.2.3 This can have accessibility implications for particular groups as when the car is being used (for example during the working day) other household members do not have access to the car and must rely on Public Transport. Likewise, where households have no car/van reliance on other forms of transport is high.
- 5.2.4 This theory would appear to be supported by further analysis of travel to work dataset, see **Figure 9** below, which suggests that the use of bus travel is higher than the local (Kent) Average.

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<sup>4</sup> DfT (2008), Public attitudes to congestion and road pricing

<sup>5</sup> Kent County Council (2010), Growth without Gridlock – A transport delivery plan for Kent

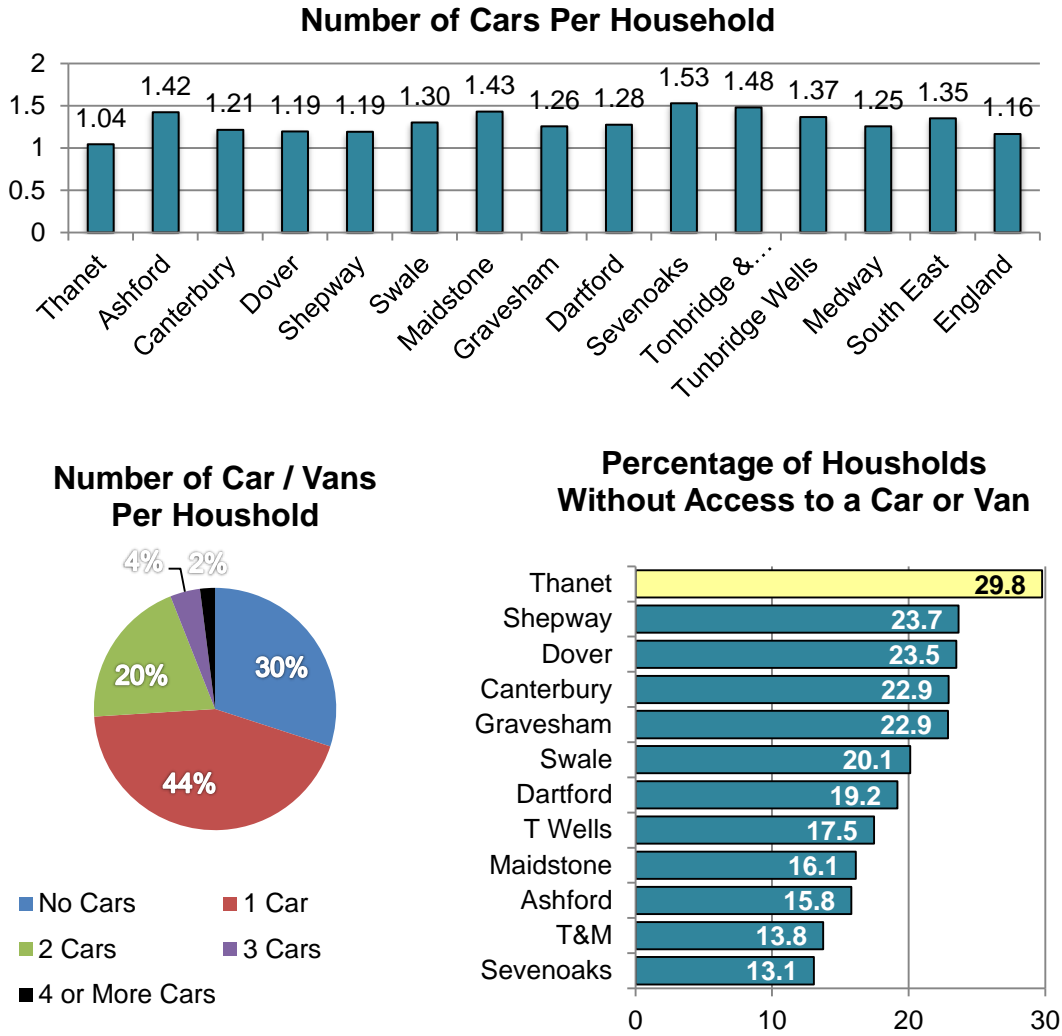


Figure 8 - Car Ownership (Data Sourced from 2011 Census)

Area	Working from home	Rail	Bus, minibus coach	Motorised Vehicle	Passenger car or van	Cycling	Walking	Other
Ashford	6.9	6.7	2.6	64.9	5.4	2.5	10.3	0.5
Canterbury	6.3	5.4	5.0	59.3	4.9	2.7	15.8	0.5
Dartford	3.6	17.9	5.2	60.1	4.4	1.1	7.3	0.5
Dover	5.3	3.8	3.6	65.7	6.2	2.2	12.4	0.8
Gravesham	3.9	11.3	6.7	62.2	6.3	1.0	8.1	0.6
Maidstone	6.0	6.9	3.8	65.2	4.9	1.2	11.6	0.5
Sevenoaks	8.0	20.4	1.6	57.4	3.6	0.8	7.5	0.7
Shepway	5.6	4.1	4.9	64.3	5.5	1.8	13.0	0.8
Swale	5.0	7.1	2.0	66.3	5.5	2.2	11.3	0.6
Thanet	5.3	4.1	6.3	61.7	6.9	2.5	12.5	0.7
Tonbridge & Malling	6.3	12.4	2.2	64.3	4.4	1.4	8.6	0.5
Tunbridge Wells	8.5	14.9	2.3	53.8	4.0	1.2	14.8	0.6
Kent	6.0	9.5	3.8	62.2	5.1	1.7	11.2	0.6
England and Wales	5.4	9.0	7.3	58.9	5.1	2.9	10.7	0.6

Figure 9 - Method of travel to work by percentage split (data sourced from 2011 Census)

### 5.3 Supporting Expansion at the Port of Ramsgate

5.3.1 Ramsgate's Port and Royal Harbour is located 76 miles from the heart of London, and close to continental ports and harbours across the North Sea and Straits of Dover. The commercial port has, until recently; operated ferry services to both Dunkerque and Ostend and has become both a construction and now operation and maintenance base for three nearby offshore wind farms. As owner and operator of the Port, Thanet District Council has published a Maritime Plan to provide a high level guide for the future operation, development and management of the port and adjacent Royal Harbour.



Figure 10 - Ramsgate Port

5.3.2 The Port includes 32 acres of commercial port land, three modern Ro-Ro bridges, a fast ferry service capability, tri-berth simultaneous operation, full passenger services and freight vessel facilities. This plan reflects the objective of accelerating local economic growth recognises the Port as a strategic asset and outlines how it is expected to grow over time. Its vision includes:

- Safeguarding the commercial port and its commercial shipping facilities.
- Supporting development of new marine infrastructure and ro-ro expansion opportunities, as well as ferry lines.
- Capitalising on potential to grow the port's existing role as an engineering and logistics base centred around off-shore renewable energy installations.
- Pursuing expansion of bulk commodity trade.
- Promoting capabilities to accommodate cruise ship calls.

5.3.3 The Port benefits from a dedicated access road enabling road traffic to connect directly to the principal road network without passing through the built up area and local road network.

### 5.4 Economic Situation

5.4.1 The prevailing economic situation in recent years has affected Thanet as it has elsewhere in the country. The local economy is focused on tourism, cultural and creative industries and the service sectors, particular in the public sector, with a high proportion of small businesses. Thanet's towns have their own unique identities and heritage on which to trade, for example Margate's connections with the artist Turner and the country's only Royal Harbour in Ramsgate.



- 5.4.2 Thanet has strong economic connections with the surrounding districts. The East Kent Access Road (encompassing both the A299 and A256) provides dual carriageway from the M25. Its completion means that there is a direct dual carriageway connection between Sandwich, Ramsgate and the motorway network to the London arterial motorways. It also links Thanet and major economic assets including Manston Business Park, the Port of Ramsgate and Discovery Park to the UK's main arterial strategic road network.
- 5.4.3 The introduction of High Speed 1 (HS1) rail services have reduced commuting time from London St. Pancras to Ramsgate to 76 minutes and Margate to 88 minutes, from almost two hours. Although journey times remain longer than those to comparator locations (such as Folkestone), recently secured Government investment is set to lead to further reductions. This route had also facilitated access from Thanet to North London rather than just to the South. Efficient transport connections and improved journey times can help make the area more accessible and therefore more attractive as a location for business investment and commuting.
- 5.4.4 Thanet's Economic Growth Strategy for 2016 to 2031 identified key areas for the Thanet economy to grow quickly and attract significant investment:

#### Transformational Initiatives

1. Developing the Port at Ramsgate
2. Investing in high value manufacturing and engineering across Thanet and East Kent
3. Positioning Thanet as a global agritech hub
4. Promoting Thanet's broader cultural/leisure offer
5. Cultivating the creative industries across Thanet
6. Designing enterprise into communities
7. Long term feasibility modelling for Margate and Ramsgate

#### Foundational Priorities

1. Working with businesses, schools and FE/HE providers to improve workforce skills
2. Developing and implementing measures to support new and small businesses in the District, particularly the provision of managed workspace and focused business support
3. Ensuring major employment sites in Thanet are managed and promoted effectively
4. Working with local partners to ensure that the visitor economy continues to evolve, reflecting fast-changing patterns of demand.

### 5.5 Car Parking Strategy

- 5.5.1 Car parking is an important issue for residents, business and visitors. Kent County Council is the highway authority for the district, and TDC work in close partnership with KCC on all parking related matters for the district.

5.5.2 The ongoing aspiration to diversify the local economy, leisure and tourism (for example; the opening of Turner Contemporary in Margate and the re-opening of Dreamland) will attract more people to travel to the district and the towns thus generating demand for parking. In parallel there is potential for local growth in car ownership. While the Local Plan aims to facilitate greater use of alternative modes of travel it remains very important to ensure that parking provision is properly managed, sufficient and suitably located for those who elect to travel by car.

5.5.3 The District Council has prepared a Parking Policy (2015-20) to provide a framework for effective parking management, and to support the Council's strategic objectives as outlined in the Corporate Plan and links in with the Thanet District Transport Strategy, Local Plan, Regeneration Strategy and the Destination Management Plan. It is important that we have a consistent approach across the whole of the district. Some of the aims of the Parking Policy are:

- Ensure the safety of all roads users by restricting parking in inappropriate locations;
- Be fair in setting fees and charges that are related to supply and demand, encouraging use of parking spaces and incentivising people to come into town centres and other attractions, and have a consistent approach across the district;
- Support the viability of Thanet's economy and regeneration initiatives that form part of this;
- Provide a clear policy for enforcement which will allow the council to deal with parking issues fairly and consistently, ensuring an efficient and effective enforcement function;
- Ensure the appropriate control of residents' parking, especially where this is affected by other parking demands;
- Seek to ensure that the provision, location and safety of public car parks are of a good quality;
- Provide a consistent and clear approach for different types of parking permits;
- Seek to ensure a clear approach towards parking for disabled persons including dealing with misuse of the blue badge scheme;
- Consider parking's contribution to environmental agendas (for example, if demand of the current electric charging points increases then the council will look at increasing the number of charging points within the district's car parks with external funding if available); and
- Ensure that the policies and services are transparent and provided consistently throughout the district.

- 5.5.4 Exploration of digital solutions to support parking services will become an on-going action within the service to continue delivering a more cost effective and efficient service for the public. These will include:
- New smartphone handhelds
  - Virtual permits
  - Residents visitors permits purchased on line
  - Mobile CCTV/ANPR camera technology for enforcement
  - Extending our online permits system to online renewals.
- 5.5.5 New schemes will be introduced to help residents and businesses to be able to get a turnaround of visitors using the bays close by. Parking services will explore a number of sites around the district for pay and display and parking schemes.
- 5.5.6 Its objectives include making more productive use of existing provision and regulation of on and off-street parking to help keep traffic flowing, improve pedestrian and motorist safety, facilitate business deliveries and enable people to park near their homes and shops. The Policy also addresses charging policy, enforcement and signage.
- 5.5.7 The established benefits of providing parking enforcement are to:
- To improve the safety of road users;
  - To assist the free flow of traffic and reduce traffic congestion, especially for emergency services:
  - To assist and improve bus movement;
  - To ensure effective loading/unloading for local businesses;
  - To provide a turnover of available parking spaces in areas of high demand;
  - Increase protection of disabled spaces, bus stops, loading bays, taxi ranks and residents parking areas; and
  - To promote and enhance the health of the local economy.
- 5.5.8 The Parking Policy seeks to ensure that parking is of good quality, safe and suitably located. It also indicates that new pay and display parking locations will be investigated as well as consideration given to potential disposal of some car parks. It is intended that existing off street town centre car parks should continue to be safeguarded.
- 5.5.9 The Parking Policy acknowledges the need to improve existing coach parking, and to explore options for locating increased provision. In particular replacement provision is expected to be required for Margate following construction of the Turner gallery and adjacent land. There is currently no specific coach parking provision for Ramsgate, and it is anticipated that additional provision will be required for Broadstairs to address peak demand.

- 5.5.10 Park and ride is an alternative solution that has been considered previously. However unlike most towns that have a scheme Thanet is unique by having four town areas that have a greater visitor demand during the summer months only. Most schemes offer drivers an easier way to leave their vehicle at an out of town location and then use a quick service to travel in to town without delays. Thanet does not have a central point that could be used for all towns that would give drivers the same opportunity.
- 5.5.11 A large amount of investment would be required for such a scheme not only for the land but for the on-going operating costs. It may be possible with partners to look at a scheme for the summer period only covering the towns that get traffic congestion.
- 5.5.12 There is also a role for planning policy to achieve the following:
- Safeguard town centre car parks but with flexibility to accommodate situations where sites are under used and where development might facilitate more suitably located or better quality provision to be delivered elsewhere
  - Set out guidance on the level of car parking to be provided for in new developments including within the individual town centres, and to identify areas where additional on-street parking may not be required
  - At Westwood, to consider how car-parking might be more effectively provided as part of a wider redesign of the area, to create a more pedestrian-friendly public realm as part of the centre
  - Support new, suitably located off-street parking
  - Improved directional signage; and
  - Safeguard existing coach parking provision and support solutions to augment provision in appropriate locations to address unmet need.

*The Parking Policy will be reviewed in 2020.*

## **5.6 Quality of Life**

- 5.6.1 One of the expected key challenges for the Local Plan will be to deliver a change necessary to raise the quality of life for Thanet's less advantaged citizens, whilst maintaining the quality of life for everyone. Thanet's historically deprived communities are found in the wards of Cliftonville West, Central Margate, Newington and Eastcliff. Alongside other programmes and initiatives, transport can go some way to address these challenges by increasing accessibility to public amenities and connectivity from some of Thanet's more deprived or rural areas.
- 5.6.2 To encourage walking and cycling generally improves overall health and fitness levels, improves air quality and helps to reduce the number of cars on the network, thus reducing congestion and saving money for the individual. Creating active street frontages, with more people walking and cycling, also reduces crime levels and can act as a catalyst for more people to become active.
- 5.6.3 The quality, safety and convenience of access by foot, bicycle and public transport are all key factors in encouraging people to select alternative modes to the private car.

## 5.7 Thanet Parkway Rail Station

- 5.7.1 The County Council’s Transport Delivery plan identifies key opportunities and challenges to be addressed to deliver long-lasting regeneration and economic growth in the County. It recognises that many of Thanet’s existing rail stations are difficult to reach by sustainable transport and offer limited car parking opportunities. This causes some commuters to travel significantly longer distances by car to access stations with better parking facilities.
- 5.7.2 The project’s objective is to support growth at Manston, Business Parks around Westwood and Discovery Park.
- 5.7.3 The following outcomes are expected from the delivery of the station:
- Increased inward investment in Thanet and Dover.
  - Thriving Enterprise Zone and surrounding Business Parks.
  - Greater employment opportunities for Thanet and Dover residents.
  - Access to high speed rail services across district.
- 5.7.4 The Parkway station will consist of the following elements which are subject to discussions with Network Rail and Local Train Operating Company.
- Two station platforms with disabled access.
  - Disabled access ramps/lifts with footbridge.
  - Ticket vending machine, waiting area and journey information point.
  - CCTV and passenger help points
  - Car Park and associated facilities with disabled access to platform.
  - Drop off/ pick up point for buses, taxis and cars.
  - Pedestrian and Cycle access

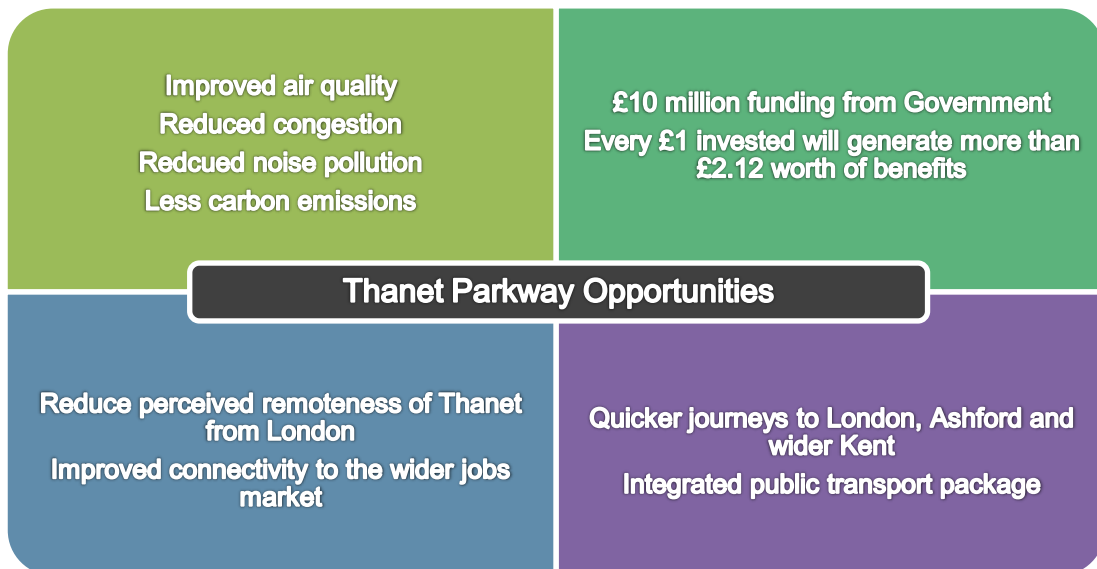


Figure 11 - Thanet Parkway Headline Opportunities

- 5.7.5 Alongside parallel Journey Time Improvement Scheme (JTI) which increases line speeds between Ashford International and Ramsgate stations, it is anticipated that journey times from London to the Thanet Parkway would reduce to 1 hour, providing a significant boost to tourism, and regeneration of the area and enhancing access to private sector employment at Ashford and Ebbsfleet.
- 5.7.6 There may also be potential air quality benefits for the St.Lawrence area resulting from this proposal.



Figure 12 - An artist's impression of Thanet Parkway

## 6 Traffic Challenges

- 6.1.1 When compared to other areas of the county, existing traffic flows within Thanet are reasonably catered for, however the road network generally lacks resilience to cope with future growth. There are a number of junctions that cause localised delays during peak hour demand. These junction delays will continue to be exacerbated if necessary improvements are not made.
- 6.1.2 A significant proportion of Thanet's housing growth is identified on land within or adjoining the main urban area, which in turn will add pressure to existing primary highway routes and junctions, which are already subject to extended delays and environmental impacts. An appraisal of the local highway network through stakeholder engagement and interrogation of junction performance has identified a number of congestions 'hotspots' within the district. The purpose of this strategy is to highlight these challenges and seek to manage growth within this specific context.

### 6.2 M2 / A2 / A299 - Brenley Corner

- 6.2.1 Brenley Corner lies outside Thanet at Junction 7 of the M2, where traffic splits between the A2 (for Canterbury, Dover and the Channel Tunnel) and the A299 into Thanet. The M2 and A2 are part of the Strategic Road Network (SRN) managed by Highways England (HE), who have identified potential future congestion issues at Brenley Corner.
- 6.2.2 Improvements at this junction must consider future growth in Thanet, as well as the travel implications arising from growth plans of other districts.
- 6.2.3 Thanet District Council, in cooperation with neighbouring district councils and Kent County Council, has prepared an assessment of the scale of planned development and transport principles to assist HE in identifying its potential impact on those parts of the SRN where capacity may be an issue.



Figure 13 - Brenley Corner

- 6.2.4 Due to the way in which the junction is arranged, it is anticipated that the impact of development within Thanet will potentially have a lower level of impact on the operation of the existing junction when compared to directly adjacent districts.

- 6.2.5 The strategic importance of ensuring that Thanet remains directly accessible from the SRN, for both commuting and leisure based trips makes continued liaison with Highways England and investigation of a long term solution for this junction a key consideration for the interests of Thanet District.

### 6.3 B2050 / B2190 - Spitfire Junction

- 6.3.1 The Spitfire Junction is a convergence of two distributor roads located in the middle of the district (the B2050 Manston Road and B2190 Spitfire Way). The B2190 is a very important local route with the A299, which is one of the primary arterial routes serving Thanet, for locally bound traffic to Margate, Broadstairs and Ramsgate.



Figure 14 - Spitfire Junction

- 6.3.2 This operates with two priority junctions adjoining the B2050, a major distributor road that links Birchington, Manston and Ramsgate. Lengthy queues form at peak times on the B2190 from the west and on the westbound approach of Manston Road. Several designs have been considered at this junction to seek to improve junction performance and safety, however the alignment of the carriageway of the B2050 and the availability of residual highway land currently present geometrical challenges to an alternative approach.

### 6.4 A28 / B2055 / B2051 - Marine Terrace / Marine Parade (Margate Seafront)

- 6.4.1 Margate seafront is the final connection point of the A28 primary highway corridor and is the end point for one of the two principal routes into the Thanet area. The clock tower junction has been subject to alternative traffic schemes in the past, which has generated mixed results. Given the nature of Margate as a popular tourist destination, there is a clear requirement to accommodate pedestrian movement whilst managing considerable traffic flow.

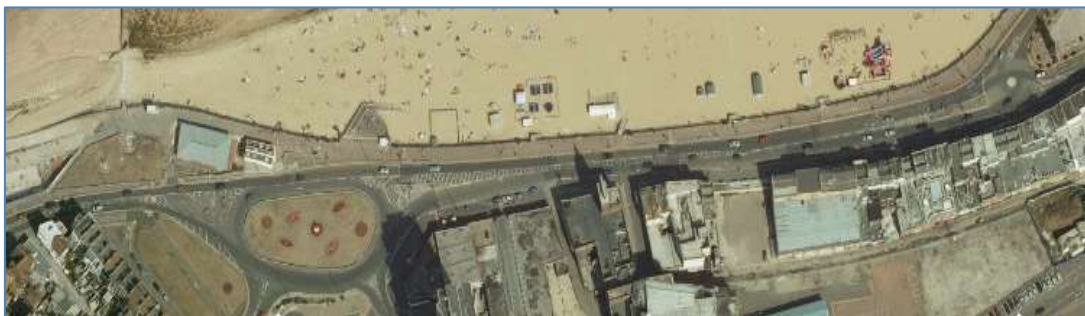


Figure 15 - A28 / B2055 / B2051 Marine Terrace / Marine Parade



- 6.4.2 At present, the numerous pedestrian crossing points located on the seafront create journey time delay to motorists due to the popularity of the beach and seafront facilities (particularly during the busy summer tourist season) create a need for these crossing points to remain operational. Network reliability also has an impact on the punctuality of bus services.

### 6.5 A256 / A255 - Dane Court Roundabout

- 6.5.1 This roundabout junction serves as a central convergence point for distributor routes to Westwood, Margate, Broadstairs and St Peter's. It suffers from long queue lengths at peak times but is constrained by frontage development and could not be significantly improved without utilising land to the west of the junction. Recent traffic surveys suggest that the predominant flows on this roundabout take place between the A256 & Vicarage Street, which in turn impacts on the ability for traffic on the A255 to 'gap seek', leading to extended queuing within the A255 Dane Court Road.



Figure 16 - A256 / A255 Dane Court Roundabout

- 6.5.2 A possible method of better managing queues at this junction would be to introduce signal control or provision of a larger roundabout with increased capacity. However, these solutions would require the use of third party land.

### 6.6 B2052 - Coffin House Corner

- 6.6.1 This junction is located at the intersection between four important local routes and as such is now one of the busiest junctions in the district.
- 6.6.2 It forms part of the entry to and exit from the Tivoli one way system and is operating as a traffic signal controlled junction. The presence of popular primary schools within close proximity of this junction have a significant impact on its operation during peak hours, both in terms of on street parking and general traffic queuing. This also creates extended delay at the Manston Road/Shottendane Road junction, which is a well-used local route and serves the local Waste and Recycling Centre and Thanet Cemetery & Crematorium.

## 6.7 Westwood Cross

- 6.7.1 Westwood continues to be a centre of development activity in Thanet. The now well established Westwood Cross town centre, which has extensive retail and leisure facilities has been highly successful in stemming leakage of retail spend from the district and attracts visitors from beyond Thanet.
- 6.7.2 A phased development to deliver over 1,000 new homes is under construction on land fronting Haine Road and Nash Road. New Haine Road opened in November 2008 providing access to further land allocated for development.
- 6.7.3 Westwood is comprised of different land parcels; however these are separated by the Primary Road Network, thus creating a barrier to walking and cycling between retail outlets. Ongoing development and subsequent congestion around the town centre, (particularly at weekends), remains a challenge, however recent improvements to the road network have provided considerable benefit, with better route choice to spread traffic demand.
- 6.7.4 The Westwood Transport Plan was endorsed by the Joint Transportation Board (JTB) in 2010. This plan includes new roads / improved junctions, alongside widening of the existing arterial roads in the Westwood area, to provide alternative routes and disperse traffic more efficiently within the local area.

## 6.8 A254 / B2052 Victoria Traffic Signal Junction

- 6.8.1 Known locally as the Victoria Traffic Lights – This junction consists of a busy and complex five way junction linking College Road, A254 Ramsgate Road and Beatrice Road. The junction is located close to local primary schools, which in turn create further constraints in and around the College Road corridor during peak hours.
- 6.8.2 Recent traffic surveys reveal a total of 27,500 vehicles travel through this junction between 7am and 7pm on a typical weekday. It is a key junction within the A254 corridor and any reduction in the level of service at this junction can impact on the wider urban areas of Margate and beyond.



Figure 17 – Victoria Traffic Signals

- 6.8.3 The junction has been subject to phase and stage changes in order to manage journey times and safety. In terms of air quality, College Road was previously identified as an area approaching the health objective for nitrogen dioxide. However, since the recent junction improvements at Victoria Traffic Signals, levels have reduced significantly.
- 6.8.4 Recent junction improvements to this junction are as follows:
- An altered the pattern of the signals to optimise traffic flow.
  - Introduction of MOVA, a system that can adjust the timing of the lights depending on levels of traffic on the different approach roads.
  - Installation of 'smart' traffic signal control equipment to provide a level of bus priority within the timing of the signals.
  - Provision of a signal controlled pedestrian crossing on College Road (east) to improve safety and amenity for those travelling by foot.
- 6.8.5 Since the introduction of the new improvements there has been a reduction in queue lengths and early indications suggest that safety at the junction has been improved. Despite these improvements, the junction continues to experience congestion during network peak times.

## **6.9 A28 / Birchington Square**

- 6.9.1 This junction is located at the end of Station Road and forms part of the A28 Canterbury Road, which is the principal road corridor leading to Margate. Throughout much of the day, Birchington Square operates acceptably, however it is subject to long delays during peak periods. This issue is compounded during hot summer months with increased visitor traffic entering and leaving Thanet. Air quality has exceeded health objectives for nitrogen dioxide here since 2005.
- 6.9.2 The junction operates as a mini roundabout and is constrained by historic frontage development and local features. A priority junction is located at Park Lane to the south of the mini roundabout, which provides access to the local Primary School, Acol Village and local rural road network.
- 6.9.3 A visual appraisal of the junction has identified that the cause of the congestion often relates to the positions of existing bus stops in the square and operation of the pedestrian crossing at the end of Park Lane combined with right turning traffic movements, which impede the free flow of traffic in the locality. When buses are stationary at the same time on both the eastbound and west bound stops, the gap between them impedes the free flow of larger vehicles.
- 6.9.4 Right turning traffic into Park Lane often cause queues at peak times partly due to the 'single way working' system which is in place, which only allows a very limited number of vehicles to queue on Park Lane. Those vehicles at the junction have difficulty emerging onto the A28 Park Lane which can lead to instances of gridlock. This often leads to queuing back along the A28, the result of which encourages traffic to seek alternative routes though the residential areas to the north and south of the A28.

- 6.9.5 Proposed growth at Birchington and Westgate will impact on Birchington Square and as such developers would be required to mitigate the impacts of their development. In order to better manage journey times and air quality issues within the locality a more comprehensive solution to traffic accessibility needs to be explored which would allow the A28 to operate with minimal interruption.

#### **6.10 A255 St Lawrence Junctions**

- 6.10.1 The St Lawrence area in Ramsgate suffers from extended peak hour queuing at its junctions of A255 Nethercourt Hill/Newington Road/High Street St Lawrence and Newington Road/Manston Road. Both junctions impact on each other due to the sheer volume of traffic and the blocking back that occurs between them. The junction with the High Street is difficult to address by way of increased road space due to the proximity of listed buildings within the immediate vicinity.
- 6.10.2 Air quality issues are prevalent in this location. The presence of a number of primary schools in close proximity to this junction exacerbate the situation, as pedestrian crossings further impact on the free flow of traffic. Unreliable journey times on the A256 Haine Road corridor currently contribute to local route choice in relation to Broadstairs; as such an improvement to journey times on the Haine corridor could be an appropriate method of managing traffic flow in this location.

#### **6.11 A256 Haine Road / Westwood Road Corridor**

- 6.11.1 The A256 Haine Road is the principal road corridor for vehicles entering and leaving Thanet from the south. The popularity of Westwood Cross as a shopping destination results in a significant number of motorised journeys during morning and evening peak hours, and also at weekends.
- 6.11.2 Haine Road is an important commuter route, used by traffic seeking to access other primary routes. The corridor is generally accessed by via roundabout junctions, however Lord of the Manor operates as a complex signal controlled junction. Lord of the Manor is subject to extended queues during peak hours, particularly on its Northern and eastern arms. An increase in activity at Ramsgate Port back to levels formally realised at full operation would exacerbate this existing traffic situation.
- 6.11.3 The junction of Manston Road and Haine Road is currently formed of a compact roundabout and priority junction arrangement. Peak hour journey times on the Haine Road corridor are generally impacted by a combination of both link demand and junction delay. Recently consented development at Manston Green, seeks to provide further junction capacity in this location through the provision of a new spine road and greater separation between junctions. Further mitigation will need to be introduced within the locality to accommodate additional traffic growth.

## 7 Air Quality

- 7.1.1 Poor air quality has an impact on people's health. It mainly affects the respiratory and inflammatory systems, but can also lead to more serious conditions such as heart disease and cancer. Thanet has the highest PM2.5 (fine particles) mortality rate in Kent, not because air quality is worse than other areas of Kent, but because Thanet has a more vulnerable population. Transport is widely recognised as one of the biggest causes of Nitrogen Dioxide (NO<sub>2</sub>) pollution.
- 7.1.2 The urban wide Air Quality Management Area (AQMA) in the district requires management through the Air Quality Action Plan (AQAP). The two junctions that have exceeded recommended NO<sub>2</sub> levels have done so due to transport emissions. Therefore this Strategy can support and take action to improve air quality not only in these areas but throughout the district. These include:
- Improving traffic flow by looking at junction and signal configuration.
  - Ensuring freight traffic uses the most suitable routes.
  - Increasing use of public transport and more sustainable modes, including car sharing, cycling and walking.
  - Considering air quality in the Development Planning process in terms of site location, travel planning and obtaining contributions for example towards public transport and supporting low emission vehicles.
- 7.1.3 Fine particles and NO<sub>2</sub> continue to be monitored across Thanet at over 30 key locations. Two areas have been identified as exceeding the annual objective for NO<sub>2</sub>: The Square, Birchington and High Street St Lawrence.
- 7.1.4 The junction of Boundary Road/Hereson Road Ramsgate is fluctuating around the NO<sub>2</sub> objective and another location close to the objective is the junction at College Road/Ramsgate Road, Margate (known locally as Victoria traffic lights). However, since the junction improvements there has been a significant reduction in pollution levels. All exceedance areas are due to traffic related pollutants in congested locations near housing. In 2011 an urban wide AQMA was declared to enable a strategic approach to be taken in tackling the problem.
- 7.1.5 The AQAP was amended in 2016 to include an Air Quality Technical Planning Guidance. The Guidance requires all major development to undertake an Emissions Mitigation Assessment to determine the appropriate level of mitigation required from a development. A transport emissions calculation produces an exposure cost value to be spent on mitigation measures.
- 7.1.6 An emissions mitigation calculation inputs the additional number of trips generated by the development into the latest DEFRA Emissions Factor Toolkit which calculates the amount of transport related pollutant emissions a development is likely to produce. The output is then multiplied by the Interdepartmental Group on Costs and Benefits damage costs for the key pollutants; NO<sub>2</sub> and Particulates. Finally the emissions total is then multiplied by 5 to provide a 5 year exposure cost value which is the amount (value) of mitigation that is expected to be spent on measures to mitigate those impacts. This value is used for costing the required emissions mitigation for the development.

- 7.1.7 The Air Quality Technical Planning Guidance seeks to increase the number of electric charging points within or close to the urban AQMA. Electric Vehicles offer the benefits of zero emissions at the point of use but the network of charging points is not yet widespread.
- 7.1.8 Recent central government announcements have provided a commitment to phase out Petrol and Diesel based on UK roads over the coming decades, therefore it is now even more important that the necessary infrastructure to facilitate this is introduced at the earliest possible opportunity.
- 7.1.9 To reflect this evolving position, it is proposed that all development within the urban wide AQMA will be required to implement EV on the following basis:
- Residential (where there are 10 or more units): 1 Electric Vehicle charging point per dwelling with dedicated parking or 1 charging point per 10 spaces (unallocated parking)
  - Commercial/Retail/Industrial: 10% of parking spaces to be provided with Electric Vehicle charge points which may be phased with 5% initial provision and the remainder at an agreed trigger level

## 8 Planned Development

- 8.1.1 The Thanet Local Plan will guide investment and planning decisions by identifying the scale and location of development to meet requirements over the period to 2031.
- 8.1.2 Traffic modelling carried out to inform this Strategy also serves to inform options for the allocation of development. This Strategy will inform policies for the Local Plan seeking to address existing challenges and identify the key transport infrastructure required to support the planned development.
- 8.1.3 The Thanet Local Plan sets a target of 17,140 dwellings to be provided over the period to 2031. Alongside this, some 5,000 jobs are expected to be created in different sectors across the district. Development includes strategic sites at Birchington, Westgate, Westwood, Ramsgate and Margate, which can assist in the provision of Transport Infrastructure. Jobs growth and economic development is expected to be focused on the town centres and existing employment sites, therefore it is expected that existing patterns of trip distribution will apply to the majority of new residential development.

### 8.2 Key Development Sites

- 8.2.1 A recent study was undertaken by Thanet District Council to consider the required level of development for the district to meet future growth needs; these are known as Objectively Assessed Needs (OAN). In order to meet the OAN, the District Council has identified a number of key strategic sites for development along with a number of smaller sites and windfall assumptions.
- 8.2.2 The strategic allocations and housing delivery projections across the entire Local Plan are outlined below and shown geographically in **Figure 18**.

Period	2011-16	2016-21	2021-26	2026-31	Total
<b>Additional Homes</b>	1,555	4,500	5,500	5,585	17,140

Site	Housing Allocation (Dwellings)
Westwood	1450
Birchington on Sea	1600
Westgate on Sea	2000
Land at Manston Court Road/Haine Road	1200
Manston Green	700
Hartsdown/Shottendane	550

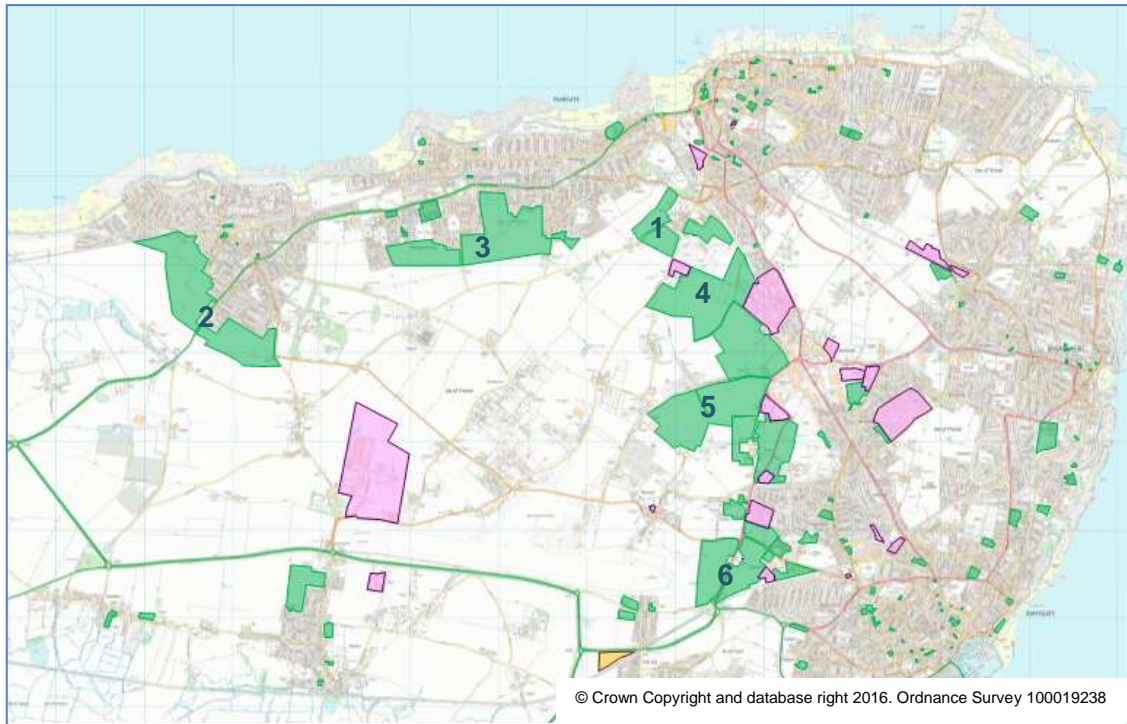


Figure 18 - Key Strategic Development Sites

(1) Margate

8.2.3 This site is located to the south of Margate. It comprises of two land parcels to the north and south of Shottendane Road. The site provides the opportunity to provide new highway links between Hartsdown Road and Manston Road, which allows traffic to travel to and from Westwood and the Waste and Recycling Centre without negotiating Coffin House Corner or the existing Shottendane Road/Manston Road junctions.

(2) Birchington on Sea

8.2.4 An open site located to the south and west of Birchington settlement to both sides of the A28 Road corridor. This site provides an opportunity to improve highway access to Minnis Bay and Quex Park, providing a level of managed growth in relation to the A28 Birchington Square.

(3) Westgate on Sea

8.2.5 A residential development located to the south of existing settlements in Westgate and Garlinge on both sides of Minster Road. The site provides an opportunity for sustainable development and can deliver contributions towards wider improvements within Shottendane Road. A new highway link between Shottendane Road and the A28 could also be delivered (subject to land).



#### (4) Westwood

- 8.2.6 Situated alongside the existing Nash Road corridor, this site provides a natural extension to consented development at Land North of Haine Road. There is opportunity to upgrade the existing Nash Road corridor, which in turn will provide a tangible alternative to the congested A254 Road corridor for Margate to Westwood bound trips. There is further potential to better link Westwood Industrial Estate to the wider highway network and enhance pedestrian and cycle access.

#### (5) Land at Manton Court Road/Haine Road

- 8.2.7 A mixed use development located to the south of Manston Court Road and the east of the existing Westwood Cross shopping centre. This site provides an opportunity to deliver part of/a proportionate contribution towards a new primary highway link between the B2050 and the A256.

#### (6) Manston Green

- 8.2.8 A development of 750 dwellings located on the A256 between Cliffsend and Westwood. Manston Green facilitates an opportunity to improve the existing A256 Haine Road corridor by providing enhanced junction arrangements. An improvement strategy for bus connectivity will also be necessary.

## 9 The Action Plan

### 9.1 Addressing Challenges

- 9.1.1 The Thanet Local Plan identifies a need for 17,140 new homes and the creation of 5000 new jobs. In order to provide managed growth and affordable transport solutions, local plan allocations have been specifically considered in the context of the existing highway conditions. To support identified growth a number of objectives are proposed.

#### General Objectives

- Minimise the need to travel or use private cars to access services, employment and amenities.
- Inform the Local Plan in identifying and delivering sustainable development options.
- Focus development at sustainable locations to reduce the need to use private cars.
- Tackle congestion and reduce the impacts of transport pollution on air quality.
- More direct walking and cycling routes to reduce isolation and potential noise and pollution and improve public health and fitness in general.
- Efficient, convenient and safe public transport system alongside expansion of larger scale infrastructure.
- Promote the internalisation of trips and reducing the need to travel as well as measures to support modal shift away from the car.
- Enhanced integration of HS1 with the wider public transport network.
- A further decrease in rail journey time between Ramsgate and London.
- Enhance bus services to both built up and more rural areas.
- Ensure that car based journeys are as free as possible of congestion and direct as possible to maintain reliability of journey time

#### Place-Specific Objectives

- Improved traffic circulation and route choice around Westwood Cross.
- Delivery of further pedestrian links around Westwood Cross.
- Manage existing congestion hotspots along A28, A254 and A256 corridors.
- Improved accessibility for pedestrians, cyclists and public transport along Margate seafront.
- A car parking strategy for Broadstairs, Ramsgate and Margate town centres in order to maintain sufficient, quality and well located provision reflecting the needs of their business and residential communities.
- Further accommodation of visitor parking at Broadstairs during peak season.

### 9.2 Improving The Local Highway Network

- 9.2.1 Where possible proposed allocations are located in such a way that off-site highway infrastructure works are limited and on site infrastructure solutions are achievable. This enhances opportunities for provision of new highway infrastructure in a fair and realistic way.

- 9.2.2 Local peak hour traffic congestion is present at a number of junctions within the district and this is often due to the way that traffic is signed and moves around Thanet within the principal distributor routes. Thanet has other well used distributor routes forming an 'inner road circuit'; these are typically B and C classification routes that are of historic alignment and geometry. A number of junctions do not meet modern transport needs in terms of safety, capacity and amenity.
- 9.2.3 Whilst these alternative routes have the theoretical link capacity ability to carry more traffic (subject to improvement), they do not currently represent a viable alternative for many trips on the local highway network. This strategy seeks to address this specific issue by improving existing links to provide enhanced route choice for vehicle, walking and cycling journeys. This is referred to as the Inner Circuit Route Improvement Strategy (ICRIS).
- 9.2.4 This ICRIS will provide direct access to and from the A28 and the A299 major road network and local destinations such as Westwood, without traversing built up areas or causing additional congestion within the network. It will also reduce pressure and free up capacity on the existing Primary Road Network, particularly on the A28 (Birchington through to Margate) and the A254 corridor to and from Westwood. Improved highway infrastructure also provides the opportunity to review existing bus services to better serve rural communities.

### 9.3 The Inner Circuit Route Improvement Strategy (ICRIS)

- 9.3.1 The ICRIS encompasses a number of key highway interventions, which will be delivered in conjunction with the relevant strategic allocations. It is anticipated that infrastructure will also include appropriate off-road cycle and footway facilities where necessary, thus improving sustainable transport links within the district. The ICRIS links a number of key destinations within the district and integrates proposed development sites with existing settlements.

#### Birchington

- 9.3.2 The proposed land allocations at Birchington will incorporate new internal road connections from the A28. This strategy proposes a new junction at the top of Brooksend Hill in advance of the built up Birchington settlement. A new road to the north will be created through the proposed development to connect the A28 to Minnis Road. This will serve the whole of the Minnis, Grenham and Epple Bay areas, and provides the opportunity for traffic to avoid the busiest sections of the A28 within Birchington (particularly The Square) when accessing these settlement areas.
- 9.3.3 The new highway links will be constructed to Local Distributor standard, thus facilitating future bus access and enhancing opportunities to serve the site and link bus services to Birchington Station. New routes will incorporate good quality shared cycle and footway facilities.
- 9.3.4 In addition to the above, a new highway link would be created to the south east from the proposed junction on the A28 to connect to the B2050 at its junction with Acol Hill. It is anticipated that much of the new road would be through the new development area. Developers will be expected to fund the entire link to a point where it meets Shottendane Road.

- 9.3.5 This link would provide direct access from the Primary Road Network to Quex Estate (a popular mixed use leisure, retail and event destination) and would discourage existing rat running which is prevalent through Acol Village (via Crispe Road) from traffic currently avoiding queues on Brooksend Hill.

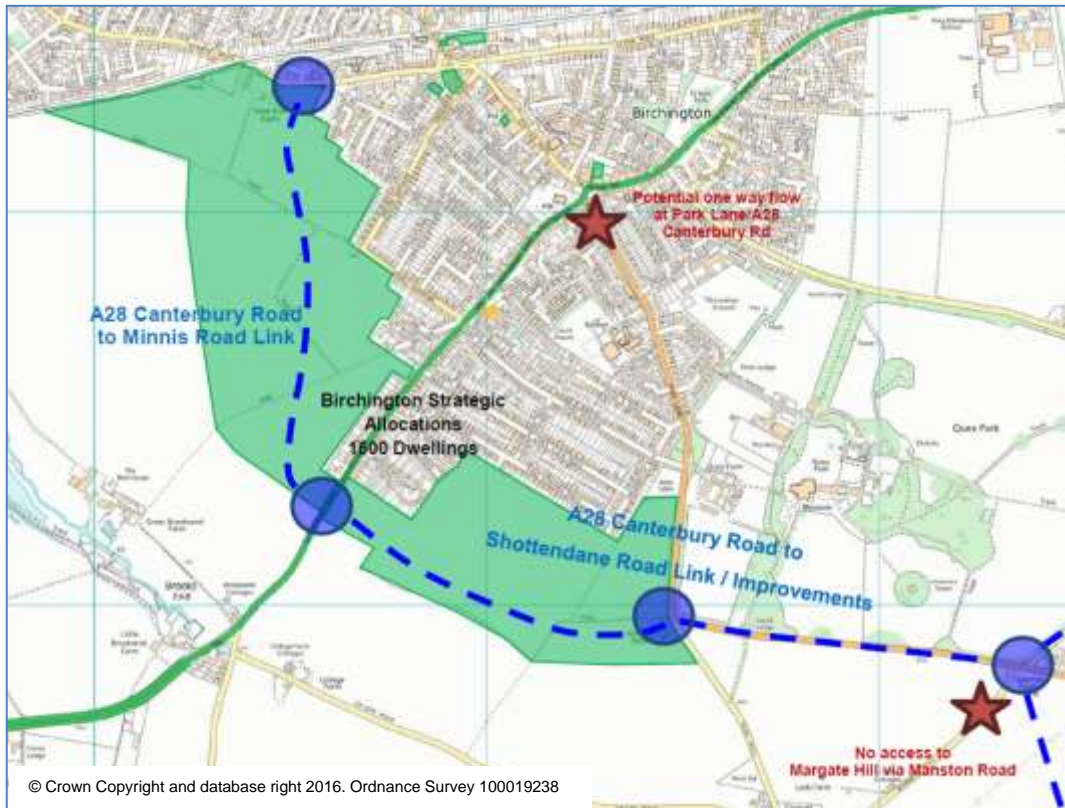


Figure 19 - A28 to Minnis Road & Manston Road New Road Links

- 9.3.6 These new highway links would divert a considerable amount of Minnis Bay and Quex bound traffic away from Birchington Square, an identified AQMA, and manage traffic impacts along the A28.
- 9.3.7 With the above highway routes secured, it may then be possible to provide additional benefits to the local road network, such as removing the mini roundabout in The Square and giving direct priority to the A28 corridor and addressing the way Station Road is served by traffic with options to improve pedestrian accessibility. This also facilitates a potential opportunity to introduce a one-way section of highway at the top of Park Lane, which would eliminate the impediment to traffic flow caused by vehicles waiting to turn right into and out of Park Lane on the A28.
- 9.3.8 The B2050 south of Quex Park would be widened and a new roundabout junction provided at Shottendane Road/Margate Hill, which accommodates a new link to Columbus Avenue on Manston Business Park.
- 9.3.9 The Columbus Avenue link improvement would enable traffic to access the A299 / A256 (Hengist Way and Richborough Way) from Thanet's northern coastal towns such as Birchington, Westgate, Garlinge and Westbrook, bypassing Acol village. Acol is currently regularly used by through traffic and its narrow roads, poor alignment and lack of pedestrian footways are a constant concern for residents of the village.

Westgate / Margate

9.3.10 The development allocation at Westgate and Garlinge will impact on the A28 route corridor with significant junction improvements necessary along the entire A28 route to offset additional trips. A package of improvements on Shottendane Road would be required, to include widening and junction improvements with Park Road, Minster Road and High Street, Garlinge will give an alternative distribution option for trips generated by the development. It would also be necessary to consider a reduction in the current speed limit to 40mph where appropriate.

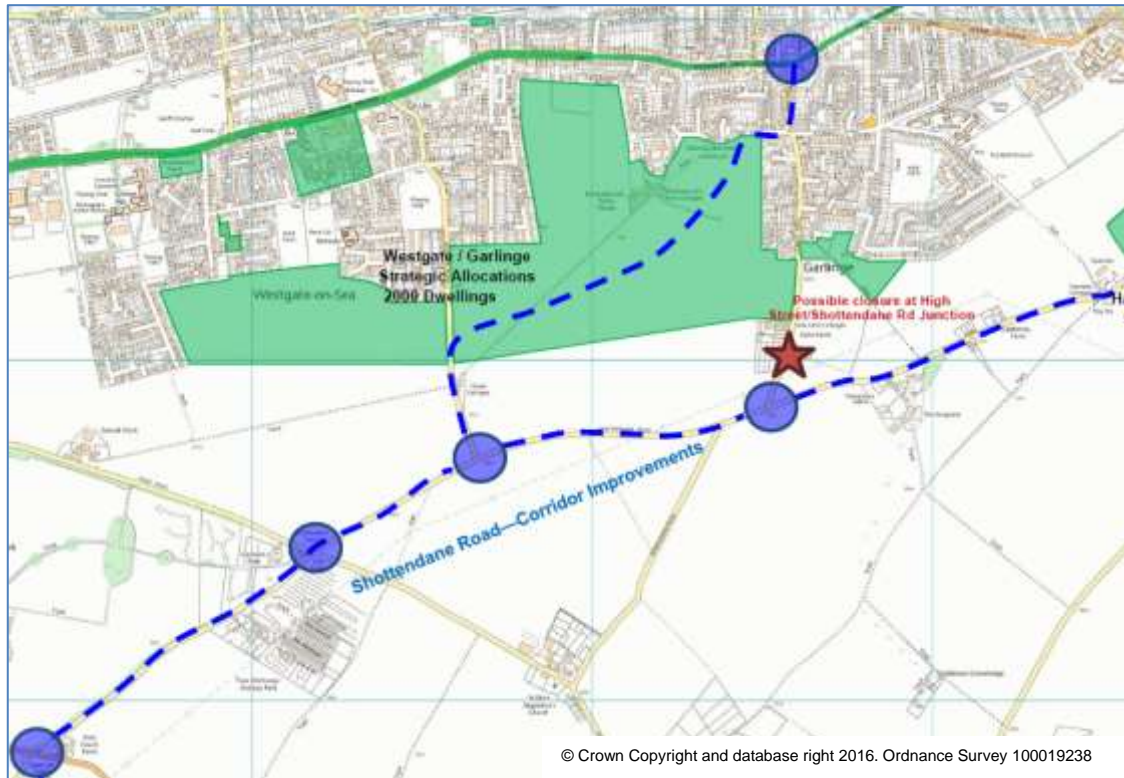


Figure 20 - Shottendane Road Corridor Improvements

9.3.11 It is widely recognised that Westwood is a primary attractor for trips in Thanet and Shottendane Road would represent a shorter journey to reach Westwood than the currently used A28 for trips from the north of the District.

9.3.12 Shottendane Road currently terminates at the Coffin House Corner junction, which is already subject to increased journey times during network peaks. In order to mitigate significant further impact, it is proposed to provide a new link between Shottendane Road and Manston Road through new development land adjacent to Firbank Gardens.

9.3.13 It is then possible for Shottendane Road to become a cul-de-sac at the junction with Manston Road further east, consolidating efficient reconfiguration of this junction to achieve optimal capacity and improve highway safety for both vehicles and pedestrians.

- 9.3.14 This new connection is beneficial as a new roundabout junction is also proposed on Manston Road to support the allocation of land behind St Gregory's School and Salmestone Grange. This land allocation will provide a new primary road link through to Nash Road, which in turn will allow Nash Road to be closed at the Coffin House Corner junction (described in more detail under Margate Junctions).
- 9.3.15 This connection would allow traffic to access Westwood without being required to travel through Coffin House Corner, Victoria Traffic Lights or use the A254 corridor. This also has the potential to discourage rat running through existing rural lanes such as Flete Road and Vincent Road by providing enhanced links to Westwood.

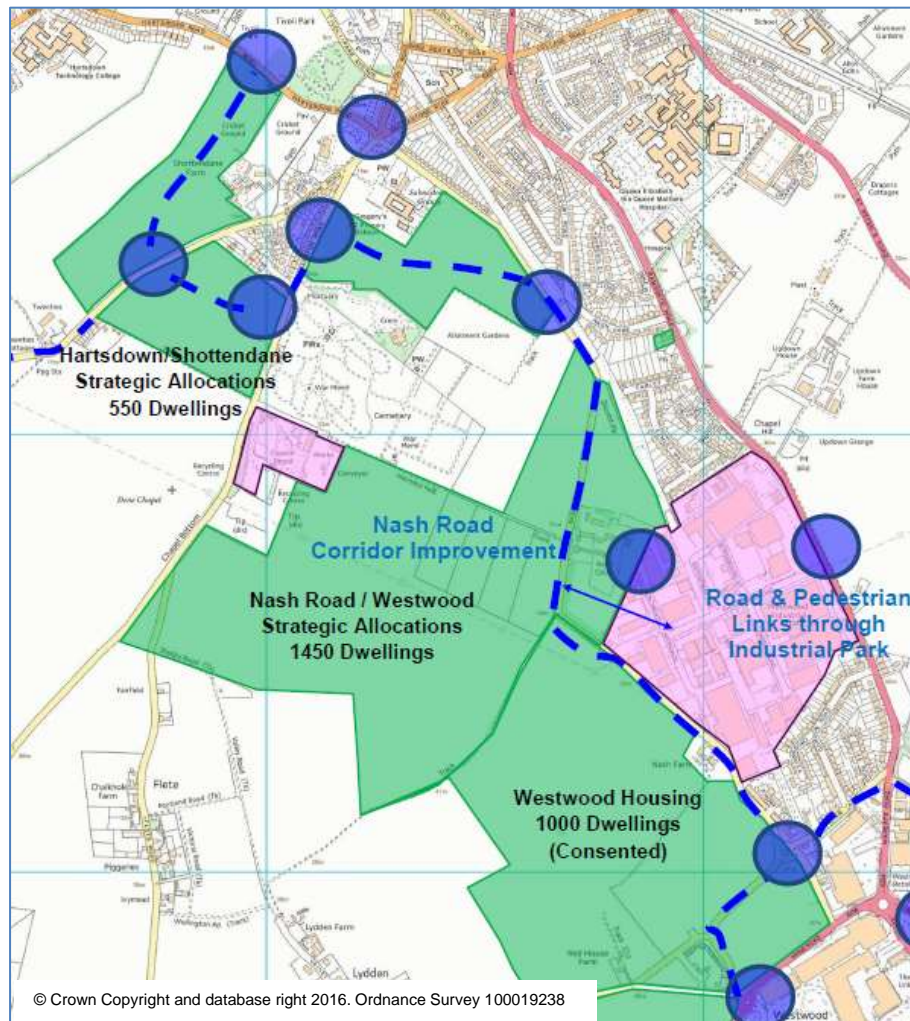


Figure 21 - Links between Shottendane Rd, Manston Rd, Nash Rd & Westwood

- 9.3.16 Land is also allocated along Nash Road (1450 dwellings) which is perfectly placed to accommodate the necessary widening of Nash Road to the new junction with Star Lane and Star Lane Link. Whilst some traffic could be diverted through the new residential development on Land North of Haine Road (1020 new homes), this development has not been historically planned with this purpose in mind. Therefore it is considered more appropriate to deliver widening along the existing alignment.

Broadstairs / Manston

9.3.17 The ICRIS continues along the newly constructed Star Lane Link and Haine Road to the Toby Carvery roundabout on the A256 corridor. Proposed development on Land Adjacent to Manston Court Road will be required to accommodate a new local distributor link road through the site, facilitating a new connection onto Manston Court Road. The section of Manston Court Road east of Valley Road could then be restricted. Further measures would be introduced to discourage the use of Vincent Road/Flete Road.

9.3.18 The remainder of Manston Court Road (between Valley Road and the B2050 Manston Road) will require significant improvements to widen the carriageway to form a local distributor road. It is anticipated that a new highway link would be created on the existing Northern Grassland within the airport site. The nature and route of this link will depend on the final proposals for this site.

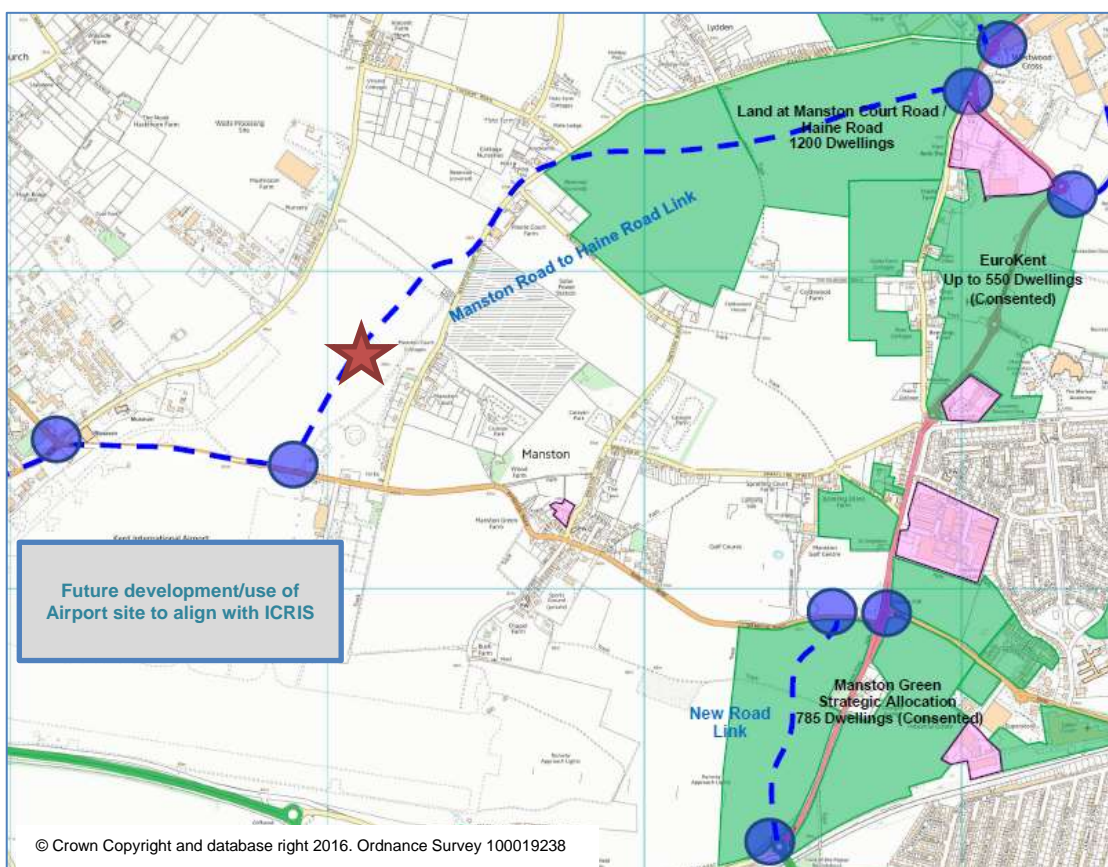


Figure 22 - Manston to Haine Road Links

9.3.19 It will be necessary for any activity or development at the airport site and Land Adjacent to Manston Court Road to make significant improvements (or financial contributions if deemed appropriate) towards the road network in the locality. Such improvements would include a new direct highway link to and from Westwood and new/improved links to the existing dual carriageway on Spitfire Way fronting Manston Business Park

9.3.20 Spitfire Junction will need to be reconfigured to address existing capacity and safety concerns and access to this junction from the A299 will need to be controlled or restricted to avoid excessive use of Manston Road for Margate-bound trips. In addition, a direct connection would be made across the site to connect A299 Canterbury Road West to Manston Court Road (once upgraded) by-passing the existing A256 approach through Haine. The extension of Columbus Avenue to the B2050/Shottendane Road/Margate Hill junction would also be delivered (to by-pass Acol Village).

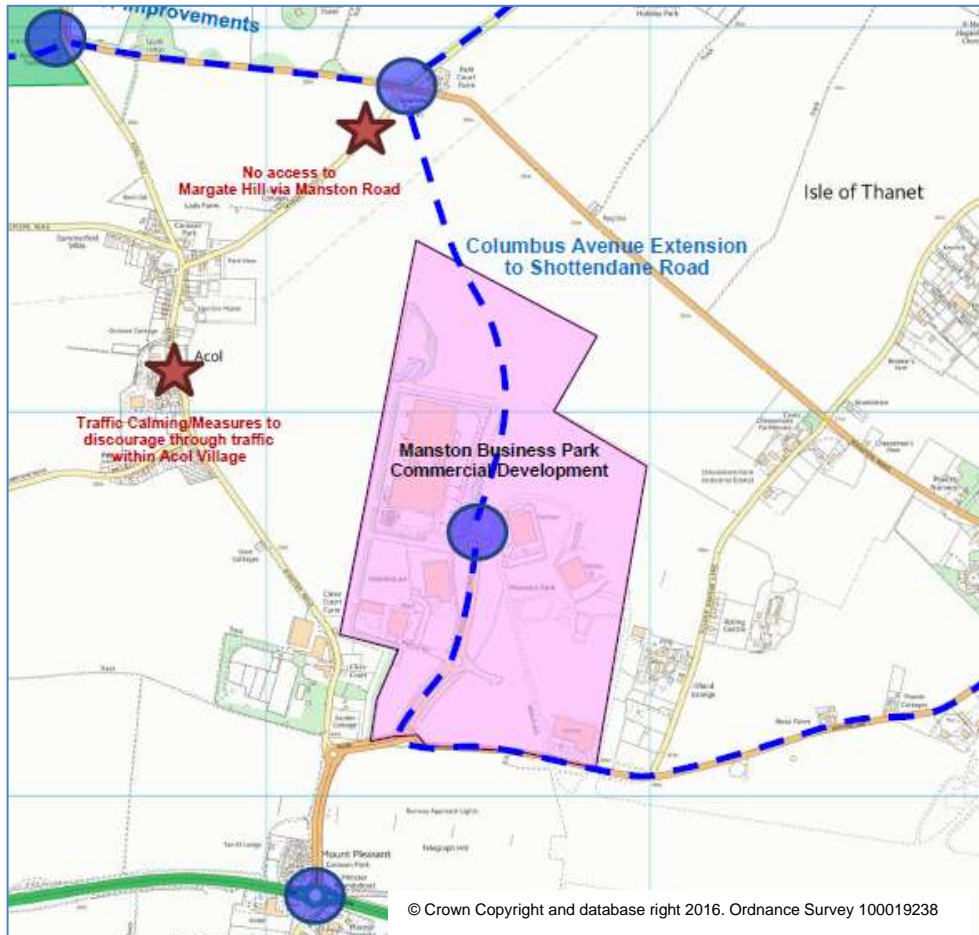


Figure 23 - Columbus Avenue Extension to Manston Road



## 9.4 Westwood Relief Strategy (WRS)

- 9.4.1 Opportunities have been sought for the economic development of Thanet, with Westwood being one of the key successes during the last decade. The growth of Westwood Town Centre, with the Westwood Cross Retail Development has led to increased traffic congestion at peak times. Until recently Westwood Roundabout has been identified as the worst pinch point, as the intersection point of roads between Ramsgate, Broadstairs and Ramsgate and at the heart of Westwood Town Centre. Despite recent improvements, this roundabout is still subject to extended delays at times of peak demand.
- 9.4.2 Congestion at Westwood causes journey time delays to trips to the coastal towns of Ramsgate, Margate and Broadstairs. Vehicles wanting to access/leave Thanet, via Broadstairs, either have to travel through Westwood to gain access to the major road network or take an indirect and circuitous route along the coastal roads. Many vehicles travelling between Ramsgate and Margate also need to travel through Westwood; as such this generates a large amount of through traffic at Westwood Roundabout.
- 9.4.3 In order to manage this issue KCC have developed a congestion relief strategy for Westwood area. This is outlined in **Figure 24**.

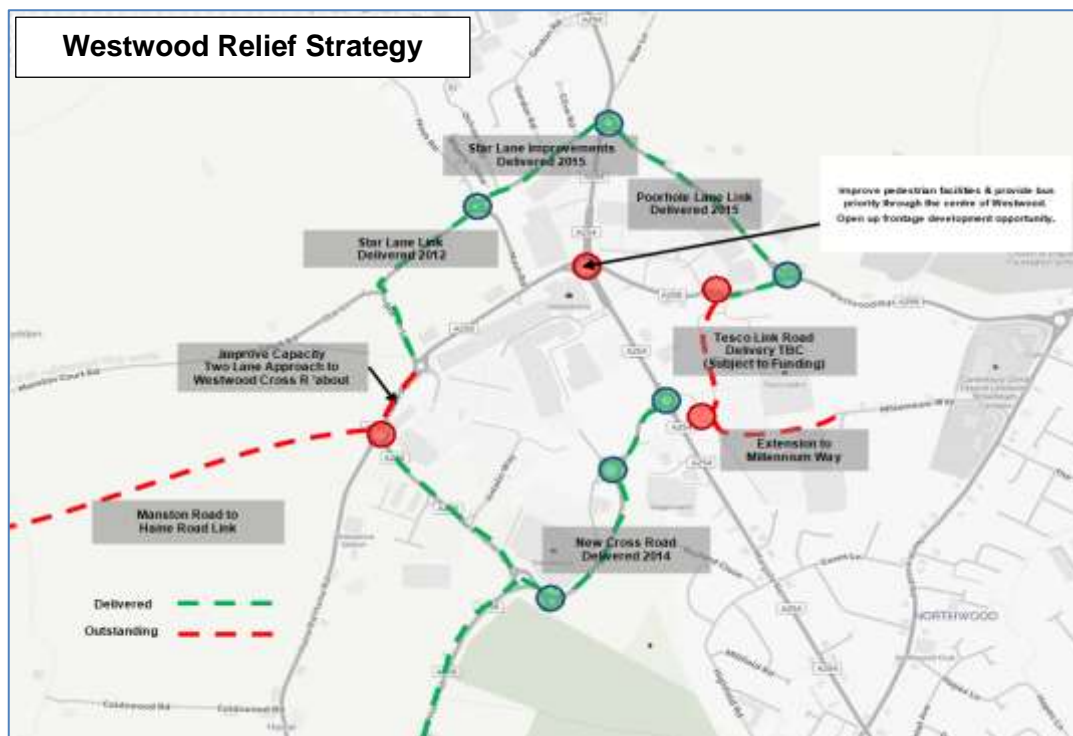


Figure 24 - Overview of Westwood Relief Strategy

- 9.4.4 In 2013 KCC were successful in securing Pinch Point Funding from Central Government, which together with developer contributions was sufficient to address Phase 1 of the Westwood Strategy. This scheme comprised of the widening of Poorhole Lane and provision of new roundabout junctions at either end (A254 & A256).

9.4.5 This important link forms part of an overall strategy for the Westwood area which takes account of new roads recently constructed, existing roads altered and proposed roads which will in due course provide a complete single carriageway ring road or “orbital route” around the fringes of the Westwood area.

Completed Schemes	<p><b>New Haine Road</b> A new road constructed by East Kent Opportunities LLP (a joint venture between KCC/TDC) and Rosefarm Estates – between the roundabout junction adjacent to the new Sainsbury’s store and Haine Road.</p> <p><b>Star Lane Link</b> New road link constructed by developers through the first phases of strategic housing development (Land North of Haine Road), connecting Haine Road with Nash Road / Star Lane.</p> <p><b>Star Lane</b> New roundabout junction constructed at the Junction with Nash Road end by developers and the carriageway has been widened to accommodate lay-by parking to the north side for existing residents.</p> <p><b>Poorhole Lane</b> New roundabout junctions at either end with carriageway widening to 7.3m and new footway/cycle ways either side.</p> <p><b>New Cross Road</b> Roundabout on Margate Road, Ramsgate has been increased in size and a new distributor road constructed to link Margate Road (A254) to New Haine Road (A256) including bus stops and new footway/cycleway facilities.</p>
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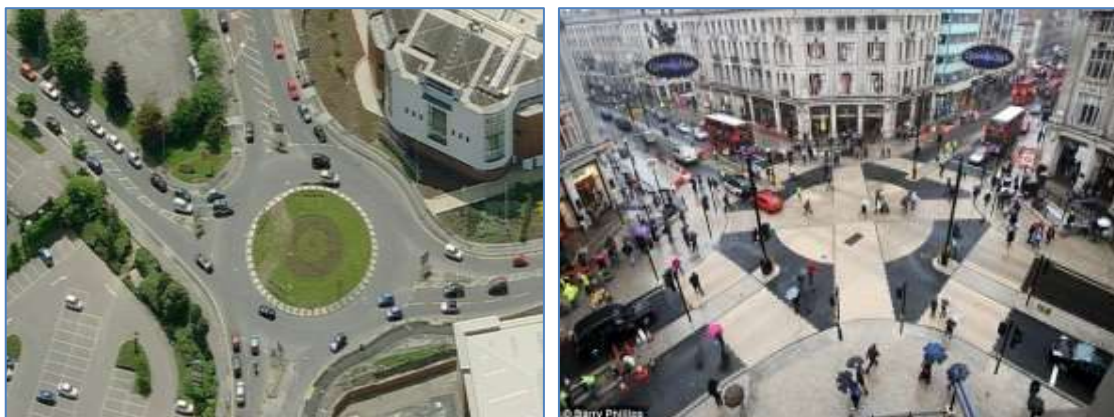
Outstanding Schemes	<p><b>A256 Westwood Road to A254 Margate Road Link</b> Upgraded and adopted by KCC to provide a new distributor route connecting Westwood Road and Margate Road. Alternative links explored if necessary.</p> <p><b>A256 Westwood Road to A254 Margate Road Link – Millennium Way Extension</b> Provision of new road/footway and cycleway link between new link road and Millennium Way, providing an alternative route to Westwood Road Via Northwood Road.</p> <p><b>A256 Haine Road to A254 Manston to Haine Link Road (addition to original WRS)</b> New road/footway and cycleway link between A299 and A256 Through prospective development sites. Providing an alternative access route avoiding the Haine Road Corridor.</p>
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Figure 25 - New Cross Road Link

## 9.5 The Future

- 9.5.1 With a new orbital route in place, improvements can be promoted at Westwood roundabout to accommodate more pedestrian and cycle movement honouring desire lines. This will encourage more sustainable access to the four retail quadrants that comprise the Westwood Town Centre. To keep the junction open at all times in order to maintain maximum accessibility of the area an approach similar to that implemented at “Oxford Circus” is currently under consideration. This would involve the removal of the existing roundabout and the introduction of traffic signals with a high level of pedestrian priority.



- 9.5.2 The junction would act to accommodate through traffic but the signals would be capable of prioritising pedestrian movement when required. A better pedestrian environment would also reduce current traffic flows generated by car-park hopping between the main retail quadrants.
- 9.5.3 In addition to the major road proposals to provide the “orbital link” a package of additional improvement measures are being sought to promote sustainable access opportunities into the Westwood area that can be funded via developer contributions. These include bus lanes on the approach to the Westwood roundabout junction along the A254 corridor and improved pedestrian and cycle connectivity with desire lines being acknowledged and accommodated.

## 9.6 Margate Junctions

- 9.6.1 A high level appraisal of the local road network and associated transport modelling has identified key congestion hotspots in the Margate area. Three major junctions were identified as being the worst affected and shown to be major constraints on the network at peak times.

The junctions are:

- **Coffin House Corner** – Hartsdown Road/Shottendane Road/Nash Road/College Road/Tivoli Road.
- **Victoria Traffic Lights** – A254 Ramsgate Road/B2052 College Road/B2052 Beatrice Road
- **Margate Clock Tower** – Marine Gardens/Marine Terrace/Marine Drive.

### Coffin House Corner

- 9.6.2 To reduce traffic impact the existing A254 Ramsgate Road corridor, an alternative route to Westwood should be explored. The most obvious solution would be to widen Nash Road throughout its length to provide all road users another route option between Margate and Westwood.
- 9.6.3 In its current form, the Coffin House Corner junction could not have sufficient capacity to accommodate the potential increase in traffic flows that would ensue from an improved Nash Road corridor. KCC are exploring the potential closure of Nash Road at its junction with Coffin House Corner and routing traffic around the back of Salmestone Grange and St Gregory's Primary School to a new junction onto Manston Road. This would enable the existing traffic signals to be optimised, allowing increased green time on given approaches, since one phase would disappear completely and the Shottendane Road and College Road phases could operate together. Such a proposal would also provide enhanced pedestrian access the school and the wider highway network.
- 9.6.4 The promotion of this alternative route to Westwood, Ramsgate and Broadstairs would have a very positive impact on other parts of the road network, including Victoria Traffic Lights and Westwood Roundabout, which are geometrically constrained. This would be achieved by providing better quality alternative routes to local destinations.

### Victoria Traffic Signals

- 9.6.5 This junction is currently optimised in terms of a traffic signal control junction with very little scope to increase the capacity and the rate of flow through the junction, without considerable loss of surrounding buildings, which in turn would have a significant impact on the locality.
- 9.6.6 Alternative options are currently being explored including the reconfiguration of traffic flows within the area to create some relief to the junction. As outlined above, growth is more realistically manageable through the implementation of the Coffin House Corner junction and Nash Road improvements, which would provide more appropriate alternative route options for journeys towards Westwood, Ramsgate and Broadstairs.
- 9.6.7 There may be some merit in providing a more formal road link utilising Yoakley Square and Perkins Avenue. This route currently operates as a rat run but would be unsuitable in its current form for vehicles wanting to head towards Cliftonville. Should such an option be explored in more detail, there are also environmental and amenity considerations to balance.

### Margate Clock Tower

- 9.6.8 The Clock Tower junction itself is highly constrained as it sits within an area of listed buildings and has tunnels below the paved pedestrian area fronting Marine Gardens which cannot be disturbed. It is necessary therefore to attempt to control the flow of traffic through the junction by re-routing a quantum of vehicular traffic away from the junction.

9.6.9 Improvements would need to be made including making the roundabout junction safer at the junction of Queens Avenue/Tivoli Road/Eaton Road/Grosvenor Place and Grosvenor Gardens. This junction has recently been improved by making Queens Avenue one-way and realigning the carriageway approach from Queens Avenue to the roundabout to improve visibility for vehicles exiting Tivoli Road.



Figure 26 - Queens Avenue Junction Improvements

9.6.10 Network modifications are currently being explored to provide an alternative route for tourist traffic destined for Margate, away from Marine Terrace via the Tivoli area and into Margate using Eaton Road, Belgrave Road and Hawley Street. This approach would assist in managing traffic volumes along Marine Terrace, which in turn would facilitate further pedestrian improvements within the corridor in the future.



Figure 27 - Queens Avenue Junction Improvements

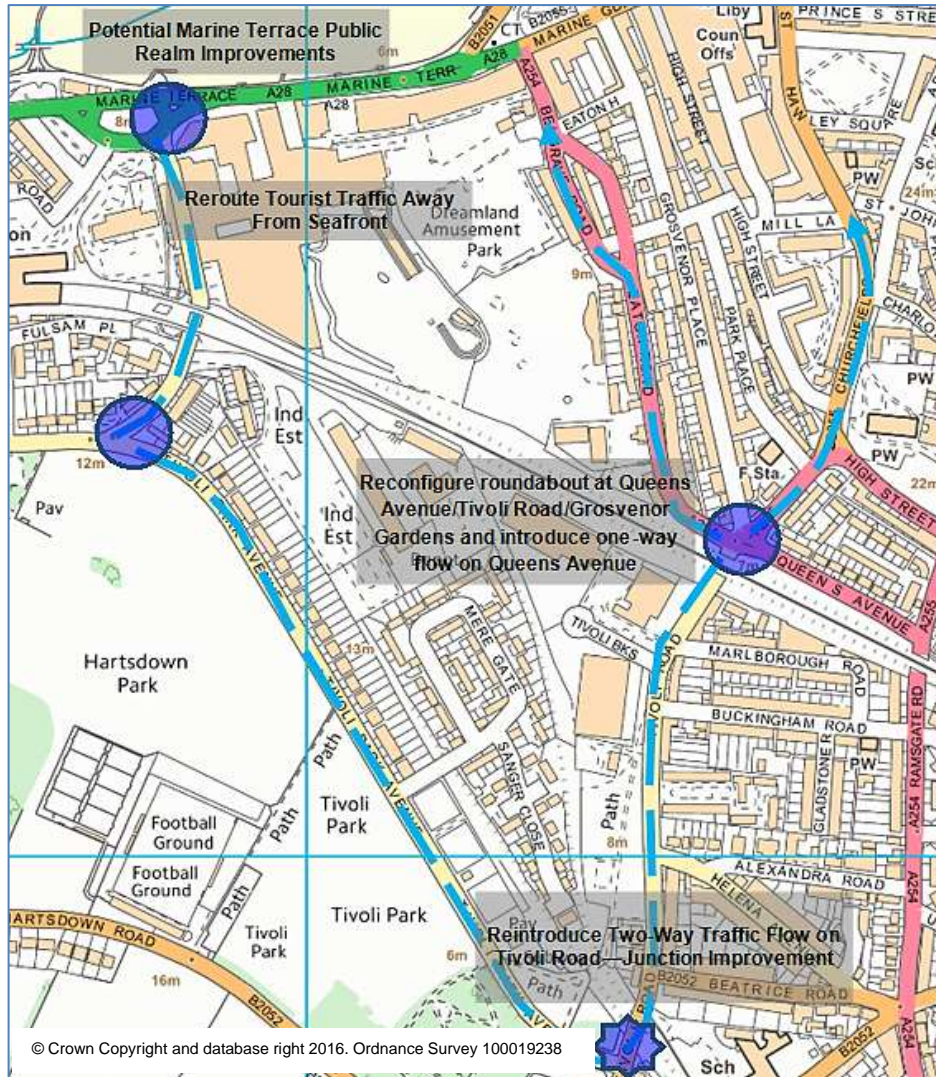


Figure 28 - Potential Future Access Strategy for Margate Town Centre

9.6.11 There are a number of amenity, land and engineering considerations to overcome before such a strategy could be implemented, however further detail and consultation on such an initiative would be forthcoming as the strategy develops further.

## 10 Sustainable Transport Interventions and Policies

10.1.1 Whilst the provision of new and improved vehicular routes is essential to the future prosperity of Thanet, it is equally important for a balanced strategy to make provision for non-motorised road users and public transport. Whilst the ICRIS will make provision for new and enhanced foot and cycle connections within the district, it is necessary to complement them with further measures to encourage sustainable travel.

### 10.2 Reducing the Need to Travel

10.2.1 National trends suggest that private car trips are generally becoming longer and more frequent in nature. In many cases the car is the most convenient form of transport and for some road users is an essential for logistical reasons. Private cars do however inherently occupy a considerable amount of road space when measured per passenger.

10.2.2 The advent of new forms communication technology has seen an increase in the ability for people in certain work sectors to either work from home or from satellite offices/facilities. This has seen a general increase in home working over the last decade, with the most recent census suggesting that over 5% of working residents within the District primarily work from home.

10.2.3 Where working at home is not a feasible option, Public Transport, Cycling, Walking and Car Sharing all occupy less road space than single occupancy journeys. Therefore if more people used sustainable forms of travel, all road users who need to make a journey by vehicle are more likely to experience shorter and more reliable journey times.

10.2.4 A reduction in the need to travel will be achieved by encouraging the following:-

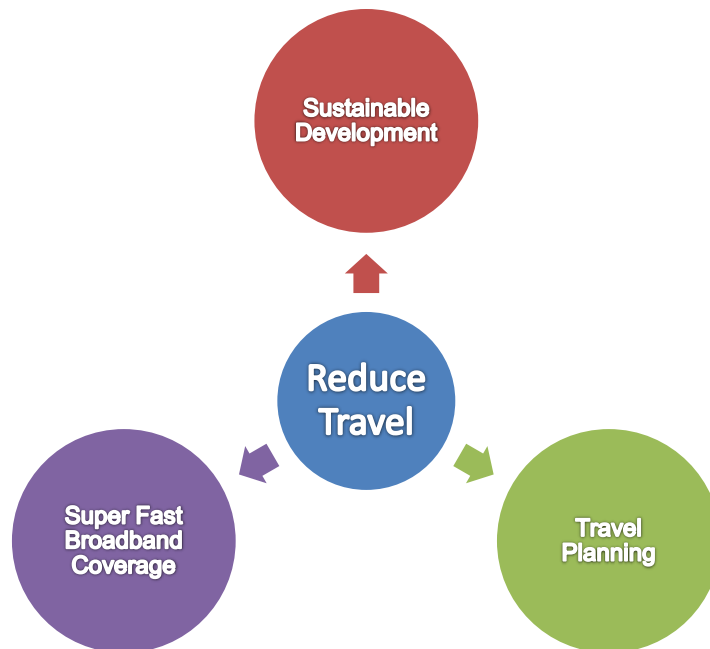


Figure 29 - Strategies for Reducing the Need to Travel

### 10.3 Sustainable Development & Travel

10.3.1 As specified within the National Planning Policy Framework (NPPF) land uses will be balanced to maximise the opportunity to minimise journey lengths for employment, shopping, education and leisure. TDC and KCC will work together within the framework of the planning process to encourage sustainable travel habits by seeking to:

- Locate development close to existing sustainable transport opportunities, or delivery of new connections/services through planning obligations
- Shape development to encourage walking and cycling through inclusive design.
- Promote mixed use developments where appropriate
- Deliver community infrastructure on larger scale developments (schools, local shops and other community based uses).

### 10.4 Travel Planning

10.4.1 Travel plans are an effective way of setting out measures and initiatives to encourage sustainable travel habits and reducing the reliance on the private vehicle. Whilst Travel Plans can be effective in managing the impact from residential development with a high level of car based commuting, they are especially suitable for large employers, either through planning obligations or through more proactive employers committed to encouraging good health and wellbeing within their workforce.

10.4.2 All development proposals that will generate a material increase in the need to travel will be required to implement sustainable travel statements, outlining a number of sustainable travel measures such as “Taster Cards” for local bus services, discounts on new cycles for residents/employees, electric charging points amongst others.

10.4.3 Development proposals that have a significant adverse impact on the local highway network which are unable to be fully managed through physical infrastructure provision, will be required to produce travel plans with ongoing monitoring mechanisms. Depending on individual circumstances, this may then provide an opportunity to manage residual impacts through positive measures. These instances will need to be assessed on a case by case basis taking into account the enforceability and feasibility of achieving the required travel mode targets over an extended period of time.

10.4.4 KCC offer support and guidance to anyone interested in developing a travel plan. Through a web-based Travel Plan Monitoring system (Jambusters), the county council provides free web based site audits and surveys which highlight current travel patterns and opportunities to bring about modal shift.



## 10.5 Bus Interventions / Strategies

10.5.1 Irrespective of the need to widen choice regarding means of travel, many people cannot drive and for some a car may be an unwarranted cost pressure. Continuing to widen the attractiveness and convenience of travel by bus can serve to advance the following:

- Potential reduction in vehicle movements thus facilitating walking and cycle travel
- Reduced pressure for use of land for car parking in urban centres thus supporting new development opportunities/better use of public space
- Reduced journey times making buses a more attractive means of travel.
- Reduced journey times for motorists who choose to drive

10.5.2 Bus services can also be predicted to improve as a consequence of the above factors. The Quality Bus Partnership allows all partners to influence these improvements. Stagecoach has given a commitment to:-

- Increase frequency of services as passenger numbers grow (subject to costs remaining the same)
- Increase frequency of services as journey times decrease (as one bus can cover more miles if it is delayed in traffic for less time)

10.5.3 The re-development of the bus route network in 2004 and the subsequent support for bus services through the QBP have established underlying growth in the bus network. Whilst the projected increases in passenger numbers in future years appear less dramatic in percentage terms they actually constitute greater absolute growth.

10.5.4 Key actions and initiatives to facilitate this growth are summarised below:-

- Investment commitments by the commercial operator (including commitments given by Stagecoach East Kent) to increase frequencies based on increased passenger numbers and improved journey times.
- Service delivery to be measured through a list of Targets supplied to the Quality Bus Partnership.
- Initiatives to achieve reduced journey times and punctuality improvements including measures to address areas of the network where buses are impacted, such as QEQM Hospital.
- Promotion of smart ticketing and advance payment to reduce dwell time at stops.
- Effective and considerate Streetworks coordination, with a strong emphasis on minimising the impact on bus routes
- Audits to identify and action potential micro-delay points along routes.
- Provide bus stops fully accessible to all users

10.5.5 Opportunities to expand the commercial network, providing improved services for the public (coverage/frequencies etc.) and also reduce reliance on KCC subsidies will be key aims across the plan period.

10.5.6 Stagecoach is committed to further developing the local network to support planned housing growth in Thanet. Outline discussions have been held already with a view to formalising proposals as the sites move closer to submission of applications. Naturally any solutions involving supported bus services will need to be considered in line with the policy position of the county council at the time of inception.

10.5.7 In principle the following outline solutions have been discussed:

- Manston Business Park – improvements to service 38\* (Birchington – Ramsgate).
- Nash Road/Westwood – initial improvements to service 8 already agreed with developers and scope to improve.
- Westgate/Garlinge – there is adequate service provision along the key A28 corridor; Stagecoach will review service 32 (Dane Valley – Garlinge) to penetrate the proposed developments.
- Birchington Strategic – Stagecoach is reviewing the provision of services to Minnis Bay and is likely to propose a diversion to one of the current services using Station Road/Minnis Road to instead divert to serve the Brooksend – Minnis Road link. The allocation to the south east of the A28 would be covered by revisions to service 38\*.
- Manston Court Road/EuroKent/Manston Green – likely to be served by a combination of diversions/enhancements to the Loop/8/34 services, again providing links to Thanet Parkway station.

\*38 – this service is operated by Stagecoach South East under contract to Kent County Council. While Stagecoach can suggest enhancements to the service, it is ultimately the County Council’s decision whether to adopt these and the operation of the service is subject to the availability of funding at the time of inception.



## 10.6 Further Rail Improvements

- 10.6.1 KCC are working in partnership with Network Rail to deliver a 10-minute planned journey time improvement scheme on the existing line between Ashford International and Ramsgate Railway stations. If line speeds increase, then journey times would drop from 36 to 26 minutes, providing journey times from St Pancras to the prospective Thanet Parkway Station around an hour. This opens up enhanced tourism, regeneration and business opportunities.
- 10.6.2 More recent improvements to Rail services in the county include the Journey Time Improvement (JTI) scheme, between London, Ashford and Thanet. The aim of this project is to reduce the rail journey time between Ashford and Ramsgate through a package of engineering interventions.
- 10.6.3 The first phase of JTI, between Ashford and Canterbury West, was recently completed with journey time savings being realised within 2018. The second phase, between Canterbury West and Ramsgate, is due for completion by 2019/20. These improvements complimented by with the provision of a new Parkway Station would significantly enhance the accessibility of Thanet in relation to the rest of the County and London.
- 10.6.4 The delivery of a New Parkway Station within Thanet is a key component to improving access to Rail travel for existing and future residents within the District. The Thanet Parkway Project Plan expresses a commitment by the County Council, alongside Thanet District Council and Network Rail, to bid for capital funding contributions to secure delivery of the Parkway Station. It also acknowledges the need to integrate the Parkway with the bus network, walking and cycling routes supported by secure cycle parking, information and other facilities.

## 10.7 Walking & Cycling Interventions

- 10.7.1 Walking is a necessary mode of transport for nearly every journey that people undertake (if only in part for some journeys). It generally forms the most accessible form of transport available. Thanet is generally very urban in nature, therefore enjoys a relatively good network of footways, however given that some urban settlements are semi-rural in nature the links between these settlements are often more restricted in nature, which can discourage longer distance journeys by foot.
- 10.7.2 Pedestrians are a particularly vulnerable to hazards posed by traffic and other users of the highway and some of Thanet's semi-rural communities are far less accessible than others in terms of footway connections. Villages such as Acol and Manston and Minster are a good example of this.
- 10.7.3 It is the intention of this strategy to concentrate on areas of the network where new and improved pedestrian connectivity can be achieved in a joined up and cost effective way. Therefore it is intended that walking will be encouraged in all new development sites by providing a safe, direct and pleasant environment through positive design and master planning.

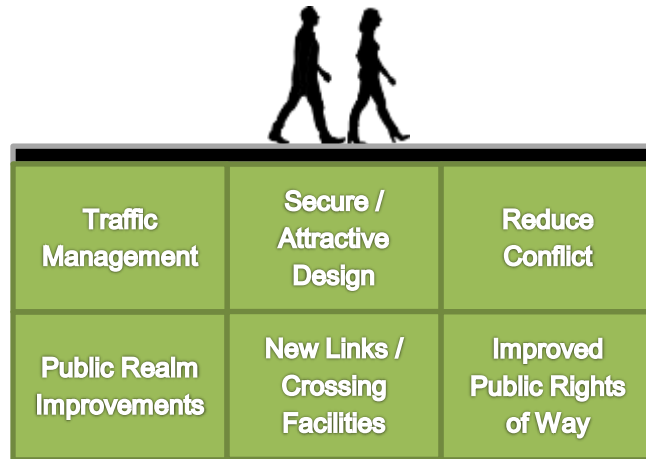


Figure 30 - The Foundations for Encouraging Walking Trips.

### Public Rights of Way (PROW)

- 10.7.4 Thanet is fortunate to have a wide network of Public Rights of Way (PROW) and these play an important role in providing access to both urban and rural destinations. The role of this network is valuable not only providing a recreational outlet free to the public, but also helping to encourage sustainable travel choices which ultimately have an impact on traffic congestion and air quality.
- 10.7.5 Access to the countryside and walking, cycling and equestrian activities provides significant support to the local economy. Access to green space is a significant factor in enabling people to improve their health and well-being.
- 10.7.6 The KCC Countryside and Coastal Access Improvement Plan (CAIP) covers the period between 2013 -2017 and provides a policy basis for improved access and connectivity within the county. Development has a role to play in delivering key pieces of PROW infrastructure.
- 10.7.7 Whilst it is not the role of this Transport Strategy to replicate the contents of the CAIP, a number of priority schemes have been identified within the District which are directly related to proposed development.

### Mobility Impaired Pedestrians

- 10.7.8 The needs of pedestrians can be very diverse, with physical ability, confidence judgement and self-awareness all contributing to challenges that road users face. What could be a relatively easy journey for one person could represent a significant struggle for another.
- 10.7.9 Mobility impaired pedestrians could include, Wheelchair Users, Elderly, Infirm, Children, visually impaired members of the community or parents with pushchairs. It is essential that development contributes towards making non-vehicular journeys as straightforward as possible, to build a truly inclusive highway network to serve all.
- 10.7.10 KCC and TDC recognise that the needs of all users is essential for new and existing highway infrastructure, to ensure that those with impaired mobility enjoy the same access and opportunities that most people take for granted.

- Provision of pedestrian ramps/aids at key crossing locations
- Provision of pram crossings and tactile paving where appropriate
- Removal and enforcement of obstructions present on the highway network.
- Reduction in street clutter including signs and other street furniture.
- Wayfinding signage to key destinations to provide people with confidence.
- Effective design of pedestrian routes to improve safety and security (overlooking, lighting etc.)
- Cater for desire lines thus reducing walking distances to key destinations.

It is essential that the above elements are considered for all new developments and highway schemes.

## Cycling

10.7.11 The Cycling Strategy for the plan period will concentrate on eight main themes:



1. Expansion of Cycle Network	5. Encouragement and Promotion
2. Cycle Friendly Route Design	6. Education and Training
3. Cycle Storage, Parking and Other Workplace Facilities.	7. Dialogue & Consultation
4. Integration with Public Transport	8. Monitoring

Figure 31 - The Foundations for Encouraging Cycling.

10.7.12 Cycle friendly route design will improve safety and convenience for cyclists leading to safer and more attractive network for cycling linking to important destinations. High priority will be given to cyclists in all traffic management areas and in the design of new roads through development opportunities. The following policies and actions will be pursued:

10.7.13 New developments must consider the needs of cyclists and pedestrians in terms of design, layout and permeability. Where master planning and efficient use of available land allows, traffic free cycle and pedestrian networks should be encouraged to provide safe, direct and attractive environments, where pedestrians and cyclists have priority over vehicles and/or vehicle speeds are kept low. These principles, follow the methodologies outlined in the Kent Design Guide and will be used to secure high quality design for new development.

10.7.14 Cyclist and pedestrian needs are to be considered at an early stage of all new development proposals. There will be a presumption in favour of incorporating facilities to benefit cyclists in all schemes, thus:

1. Schemes involving new housing will incorporate in planning appropriate parking for cycles, road networks friendly to all users and links to existing cycle routes to ensure connectivity to schools, places of work and retail outlets.
  2. Where appropriate new internal estate roads within developments will be designed to encourage speeds of 20mph or lower. Local distributor roads will be designed with segregated cycle provision
  3. Where schemes involve signal junctions it is recommended that they will incorporate facilities such as cycle lanes and advanced stop lanes and lighting sequences that considers cyclists
  4. Segregated facilities or cycle lanes will be provided wherever possible as part of new road schemes, ensuring safe passage through junctions.
  5. Traffic calming will use cycle friendly measures.
  6. Cyclists will be generally exempted from all new road closures, one way restrictions and banned turns, except where there is a technical or safety case for not doing so.
  7. Cycle parking will be provided in appropriate locations in accordance with specified standards.
- 10.7.15 A Cycle Audit will operate in parallel with Road Safety Audits that are a statutory requirement of any new highway route, to ensure adherence to appropriate and high quality design standards.
- 10.7.16 A primary target of this strategy will be to provide the missing links in the existing routes to give connectivity and safety on the Thanet Cycle Network by the end of the Local Plan period. The already well developed longer distance network and National Cycle Network will link Thanet's towns to each other, to other towns in East Kent and to the countryside. While off-road paths have an important role in the networks, many routes use both major and minor roads. On main roads forming part of the cycle network, priority will be given to achieving continuous facilities where highway geometry or land availability allows.
- 10.7.17 Cycle network proposals will be further developed in consultation with the Thanet Cycling Forum and other interest groups as a matter of course.

## **10.8 New / Improved Walking & Cycling Links**

- 10.8.1 Identified links to be addressed to support improved pedestrian and cycle linkage between proposed growth areas are as follows:-
1. Construct shared facility on Sloe Lane, Margate to complete a route between Dane Valley and Westwood.
  2. Improvements to Westwood main junction and adjacent roads to improve bus and cycle provision and improve accessibility and movement for pedestrians between different areas of Westwood Town Centre

3. Create shared facility on existing path to the rear of Bromstone School, Broadstairs to connect to Millennium Way to offer alternative to cycling on Rumfields Road between Broadstairs and Westwood.
4. Provide improved surface and widen Bridleway TM16.
5. Provide improved surface and widen Bridleway TM11.
6. Upgrade Footpath TM14 on edge of development to Bridleway.

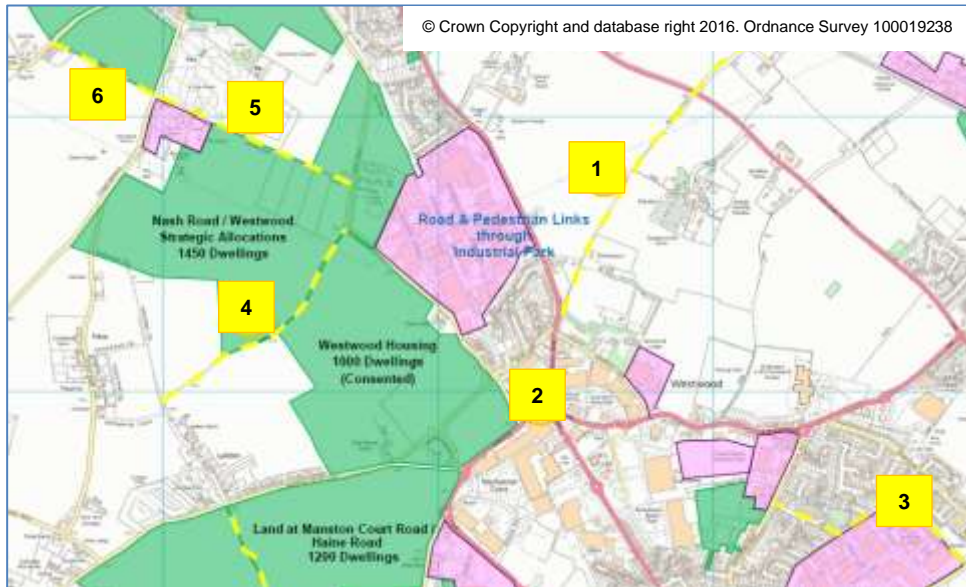


Figure 32 - Cycle Route Improvements around Westwood

7. Create shared facility on existing footpath between Ramsgate Road, Broadstairs and Dumpton Park Drive, Broadstairs to the side of former Holy Cross School. Then continue above shared facility between Ramsgate Road, Broadstairs and Rosemary Avenue, Broadstairs

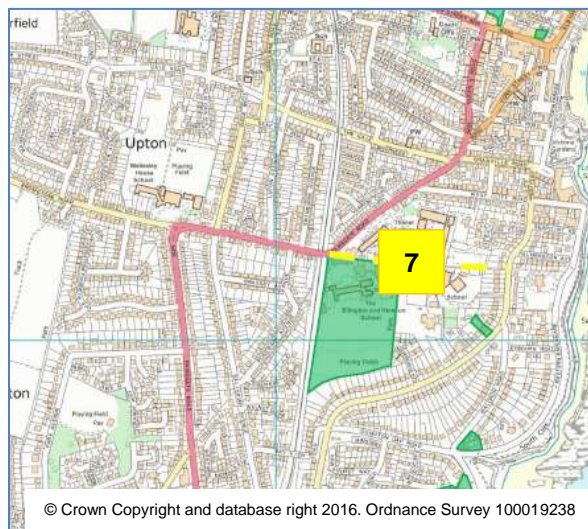
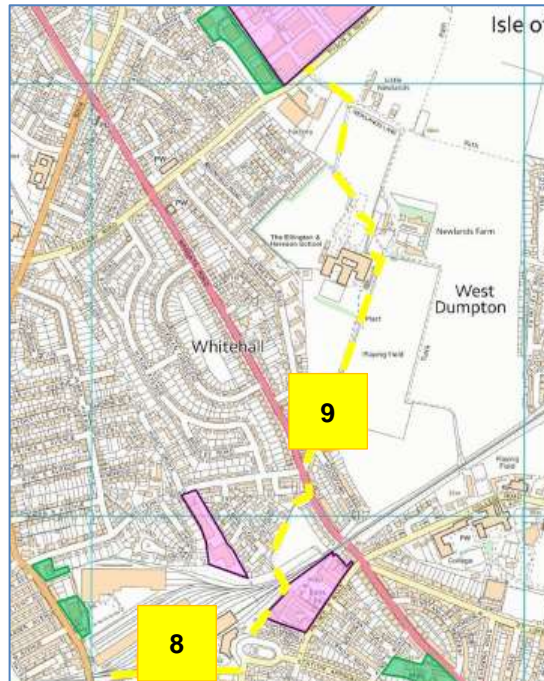


Figure 33 - Cycle Route Improvements - Ramsgate Road to Dumpton Park Drive, Broadstairs

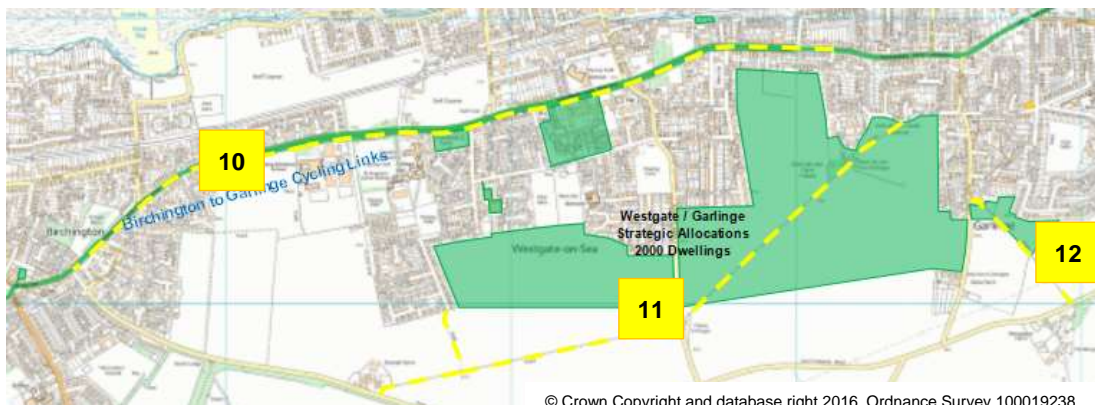
8. From Ramsgate Railway Station create shared facility on existing footpath to Newington Road.
9. From east of Ramsgate Railway Station create shared facility on existing path to Margate Road, provide crossing facility to access Newlands Road and create link to Pysons Road using Newlands Lane.



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Figure 34 - Cycle Route Improvements - Ramsgate Rail Station to Newlands Lane

10. Provide a new off road cycle facility (on existing footpaths) to link Birchington to Margate including existing secondary schools, residential settlements and commuting destinations
11. Creation of shared facility on existing public rights of ways between Dent-de-Lion Road, Garlinge and Park Road, Birchington.
12. Improvement of Bridleway TM22 surface to width of 3m as part of Garlinge development.



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Figure 35 - Cycle Route Improvements - Birchington/Westgate/Garlinge



13. Off road section between Convent Road, Broadstairs and the existing off road shared facility further along Joss Gap Road (on edge of golf course).

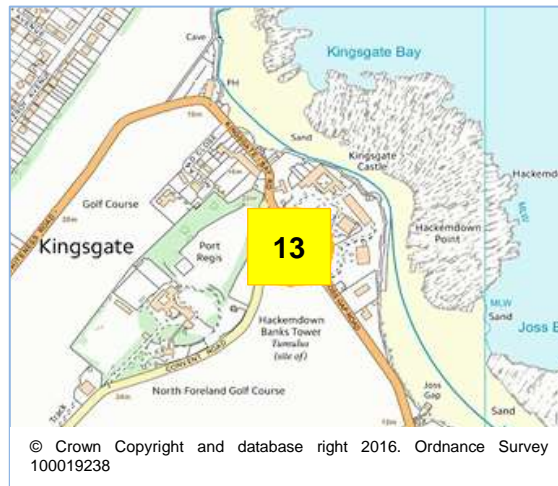


Figure 36 - Cycle Route Improvements - Convent Road, Broadstairs

14. Creation of shared facility on south east side of Dane Park, Margate to link Dane Valley cycle route with Northdown Road, via St Dunstan's Avenue.
15. Provide missing shared facility on SW side of St Peter's Road between Broadley Road and Lister Road, Margate

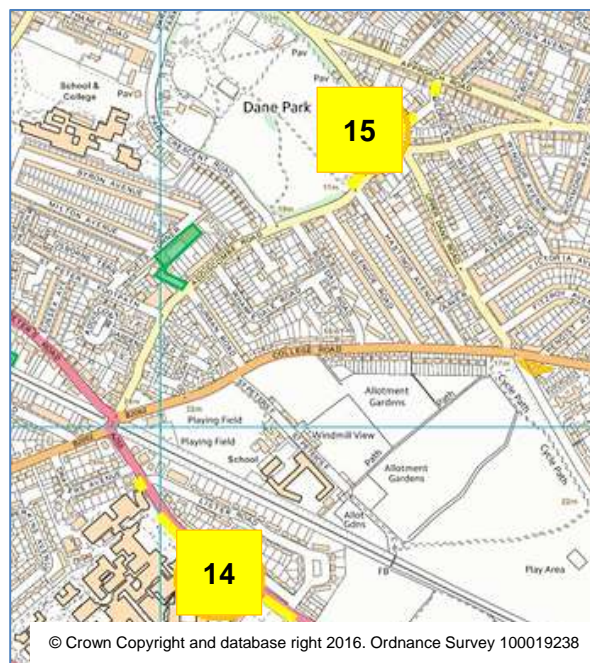


Figure 37 - Cycle Route Improvements - Dane Valley Road/St Peter's Road, Margate

16. Provide new shared facility between Durlock and Sevenscore as alternative to Grinsell Hill/ The Lanes/Foxborough Lane.

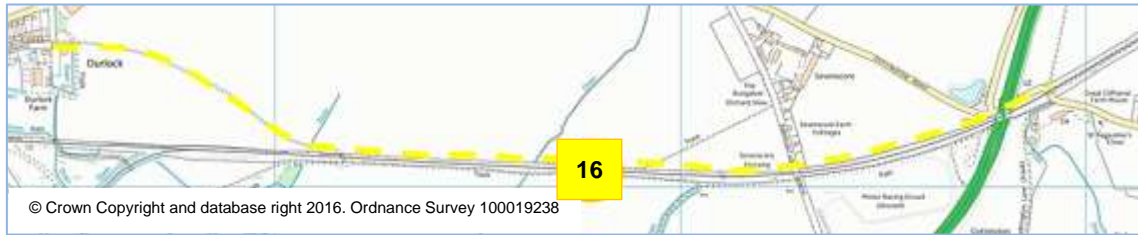


Figure 38 - Cycle Route Improvements - Durlock/Sevenscore

17. Upgrade Footpath TR24 to Bridleway - Crossing point required on Manston to Haine Road Link.
18. Upgrade Footpath TR9 to Bridleway \*(Delivery of this route is dependent on uses within airport site)
19. Improve surface of Bridleway TR8 and widen to 3m\* \*(Delivery of this route is dependent on uses within airport site)
20. Creation of new Bridleway and Improve TR32 to link Parkway Station to Manston \*(Delivery of this route is dependent on uses within airport site)
21. Improve surface of Bridleway TR10 and widen to 3m.

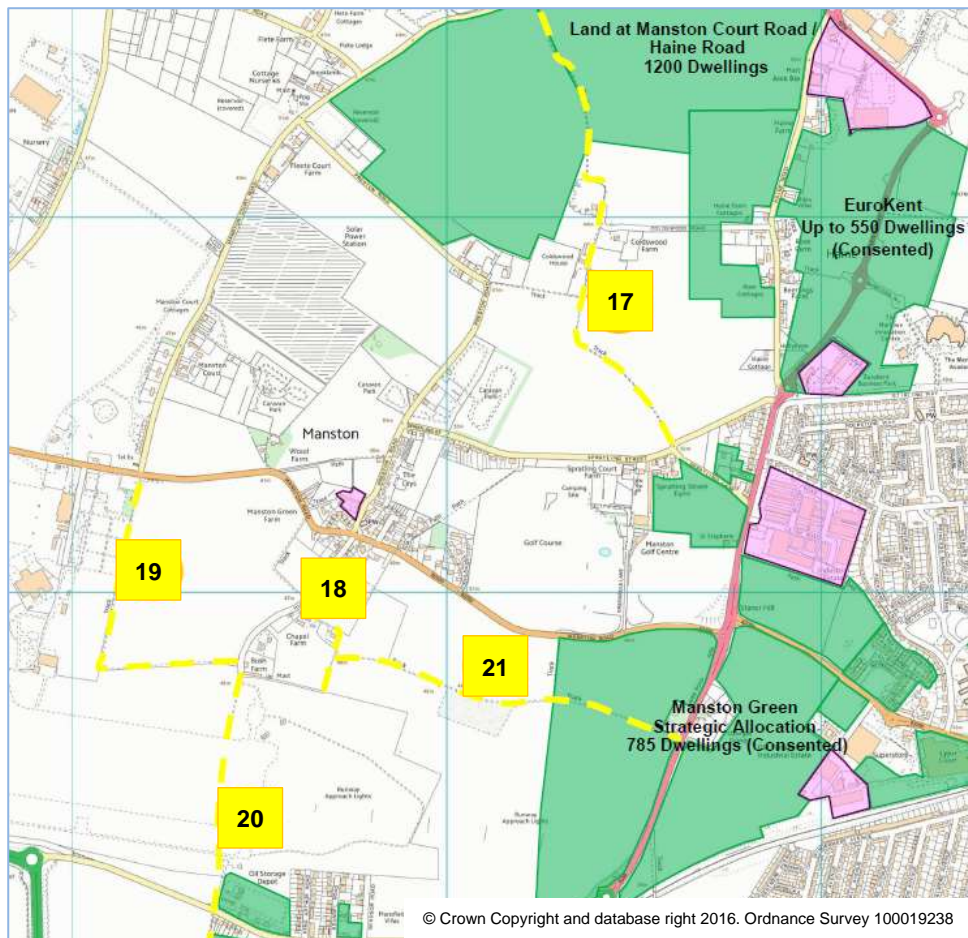


Figure 39 - Cycle Route Improvements – Manston/Cliffsend

- 22. Upgrade footpath TM31 to Bridleway to link to TE12A & Shottendane Road improvements to provide shared use pedestrian cycle route.

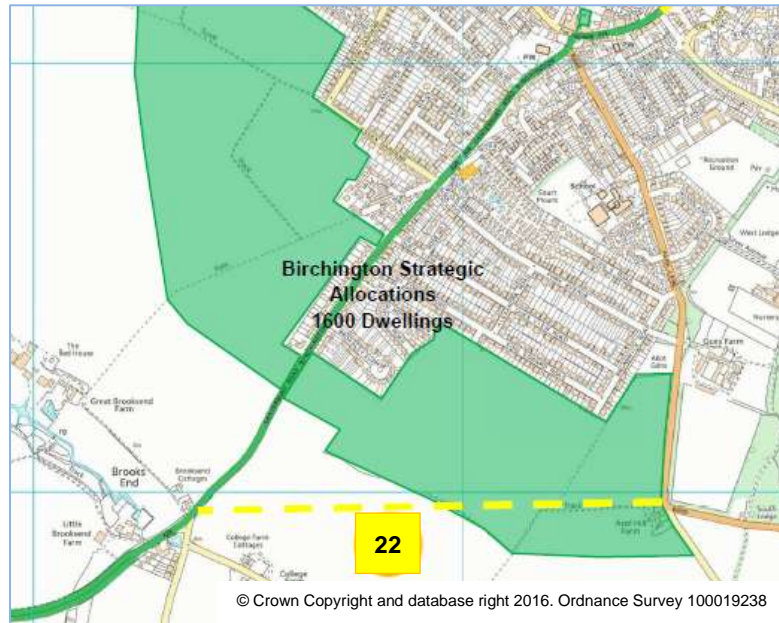


Figure 40 - Brooksend PROW Improvement

## 11 Informing Growth Options in the New Local Plan

- 11.1.1 The Local Plan will need to plan for growth, including land needed for business development and new housing, over the period to 2031. The Plan preparation process includes assessing options on how much development should be planned for and the most sustainable locations to accommodate it.
- 11.1.2 Government's National Planning Policy Framework (NPPF) states that transport policies have an important role to play in facilitating sustainable development and in contributing to wider sustainability and health objectives. Key messages include that the transport system needs to be balanced in favour of sustainable transport modes, giving people real choice about how they travel. Local Plans are therefore required to ensure that developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable modes will be maximised. Their policies are expected to aim for a balance of land uses to encourage people to minimise journey length for employment, shopping, leisure, education and other activities.
- 11.1.3 The NPPF recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable travel will vary from urban to rural areas.
- 11.1.4 In identifying the most suitable options for the location of new development in the Local Plan, it is important to assess locations in terms of ability of people to access services and employment, and where feasible to do so without the need to rely on private cars. Such assessment has been built in to the process applied to identify proposed housing land allocations.
- 11.1.5 Nonetheless people will still elect to use cars, and the capacity of the transport network for cars and other forms of transport will be an important factor in considering options for locating development and associated transport infrastructure requirements.

### 11.2 Thanet Transport Network Highway Model

- 11.2.1 The characteristics of Thanet's transport network are an essential starting point in considering the transport implications, opportunities and associated infrastructure requirements related to growth options. The strategy for addressing the likely impacts of strategic growth have firstly been appraised at a high level, taking into account known areas of congestion and how this might be managed by either upgrading or improving existing routes or making better use of underutilised infrastructure.
- 11.2.2 The process of identifying managed growth within the Thanet Area has taken some considerable time and has undertaken further iterations. As such the approach to appraising the impacts and testing proposed mitigation associated with local plan growth has evolved with it.

- 11.2.3 A strategic transport model was originally constructed in 2010, enabling Thanet's highway network capacity to be evaluated in a range of scenarios, from its 2011 baseline the model was capable of providing forecasts for any year up to 2033 based on variable options regarding the quantity and broad location of development. This model informed initial appraisals of the 2015 Preferred Options Consultation.
- 11.2.4 The model covered a number of key routes into Thanet primarily focussed on the principal route corridors crossing the district. The core network was modelled in detail and focussed on the corridors in and around Westwood.
- 11.2.5 The first iteration of strategic modelling that was undertaken to appraise local plan options focussed on main routes within Thanet linking the key towns and a number of key locations generating/attracting trips. These included Westwood Cross shopping centre, several large supermarkets and the QEQM Hospital.
- 11.2.6 The 2011 baseline scenario indicated that travel demand and constraints in the highway network culminate in high levels of congestion and "rat running" at peak times and on Saturdays. This will potentially be compounded by natural and planned growth. It indicated that a number of junctions experience serious "worst turn" delays. However it is important to note that such classification may be triggered by a single recorded vehicle turn and therefore informed interpretation is required.
- 11.2.7 The model served to inform this Strategy by highlighting existing and potential pinch points in the network. This Strategy has identified the need to tackle capacity issues identified at Coffin House Corner, Victoria Traffic Lights, Margate seafront and Clock tower, and Tivoli Bridge/Queens Avenue.
- 11.2.8 To enable effective testing of the proposed local plan growth on the local highway network and potential strategic highway interventions, it was necessary for a wider Strategic Highway Model to be built to encompass a wider area of the district. The purpose of the model is to identify future highway traffic flow conditions (with and without proposed development) and assist in identifying potential solutions to future growth needs and to provide a more recent picture of highway conditions.

### **11.3 New Strategic Highway Model**

- 11.3.1 Amey were commissioned by Kent County Council (KCC) to develop a strategic transport model for Thanet district for the purposes of testing forecast development and transport intervention scenarios for the emerging Local Plan to 2031.
- 11.3.2 When considering the coverage of the model a number of constraints needed to be considered. It is important to strike a balance between the time that the model takes to develop, the cost of the study against the outputs that are required.

## Base Model

11.3.3 A 2017 base year model was initially developed using SATURN software. The area of focus for the model is the A28 and A254/A256 corridors, as the proposed major allocation sites and infrastructure improvements within the Local Plan are located around this area. The figure below shows the detailed modelled area (purple) and area of interest (brown) for the model:

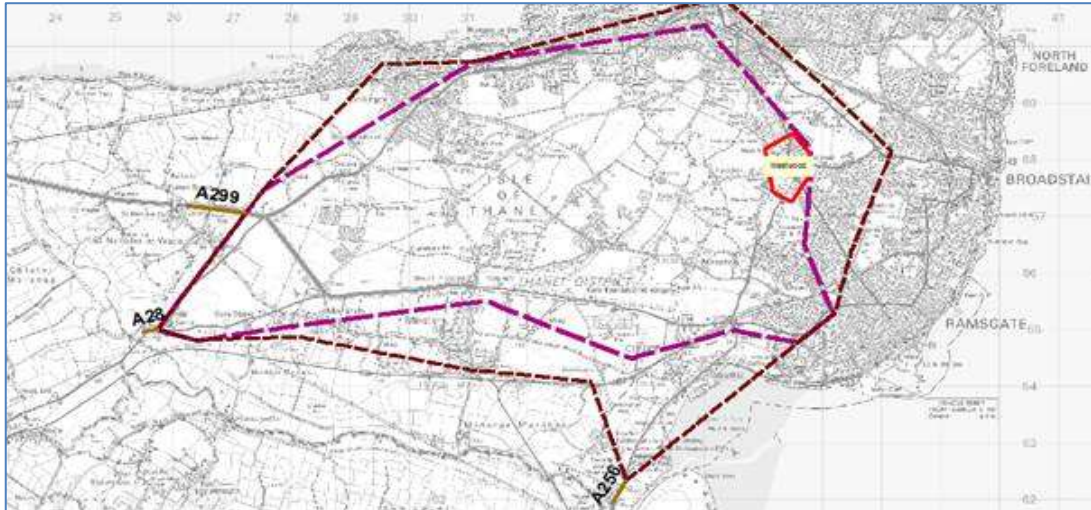


Figure 41 - SATURN Model Study Area

11.3.4 The model zoning system is based largely on the 2011 Census Lower Super Output Area (LSOA) boundaries and the Thanet area is made up of 93 zones. There is one notably large output area which encompasses the rural hinterlands of Thanet. This has been divided into three zones, including a bespoke zone for the Manston Business Park on Columbus Ave. The Westwood area (Westwood Cross shopping centre, two supermarkets and three retail parks) has also been designated as a specific zone.

11.3.5 The baseline traffic data underpinning the model comprises various datasets and sources. The principal source of origin/destination data was obtained from mobile phone data provided by Vodafone. The data was expanded from the sample using Census household population figures. In addition the following data was also used to develop, calibrate or validate the base model:

- Manual Classified Junction Turning Counts;
- Automatic Traffic Surveys;
- Queue Length Surveys;
- Average Journey Time data; and
- An ANPR survey around the Manston Airport site.

11.3.6 Based on the broad understanding of the likely options to be tested, the AM and PM peak base models were considered to provide an appropriate tool to form the basis of forecast assessments of the impact of potential development and infrastructure improvements on the local network to support the Local Plan.

## Forecast Model

11.3.7 A number of forecast scenarios have been assessed for the forecast year 2031, which represents the end of the proposed Local Plan period. Fundamentally the forecast scenarios are based on a single spatial strategy for development and were intended to test the impacts of that development scenario with and without the proposed Transport Strategy interventions. The forecast scenarios are summarised in the table below, more detailed commentary on these outputs can be found within the Forecasting Report, which accompanies the local plan evidence base.

Forecast Model		Model Summary
DN	2031 Do Nothing	<ul style="list-style-type: none"> <li>• 2031 forecast travel demand from committed/permitted development (including Manston Green and EuroKent);</li> <li>• Committed highway improvements (e.g. Manston Green proposals)</li> </ul>
DM	2031 Do Minimum	<ul style="list-style-type: none"> <li>• As per the Do Nothing scenario; plus</li> <li>• Strategic allocation sites</li> </ul>
DS	2031 Do Something	<ul style="list-style-type: none"> <li>• As per the Do Minimum scenario; plus</li> <li>• Proposed Transport Strategy interventions</li> </ul>

11.3.8 The development strategy for the Local Plan is largely housing led, with employment land uses proposed to maintain the status quo in terms of the proportion of in/out commuting to/from the district. The breakdown of the housing allocations within the proposed Local Plan and included in the Do Nothing and Do Something scenarios is set out below (please note that housing completions up to 2016 are included within the base model traffic flows):

Development	Housing (units)
Permitted/committed development	3,700
Windfall sites	2,700
Local Plan sites	9,200
<b>Total</b>	<b>15,600</b>

11.3.9 The Transport Strategy interventions tested within the Do Something model scenario are highway only improvements consisting of a proposed 'inner circuit', comprising new and upgraded links, with the aims of providing more route choice options and relief to the existing A28 and A254/A256 corridors. An outline of the proposed 'inner circuit' proposals is shown alongside the principal Local Plan allocation sites in the **Figure 42**.

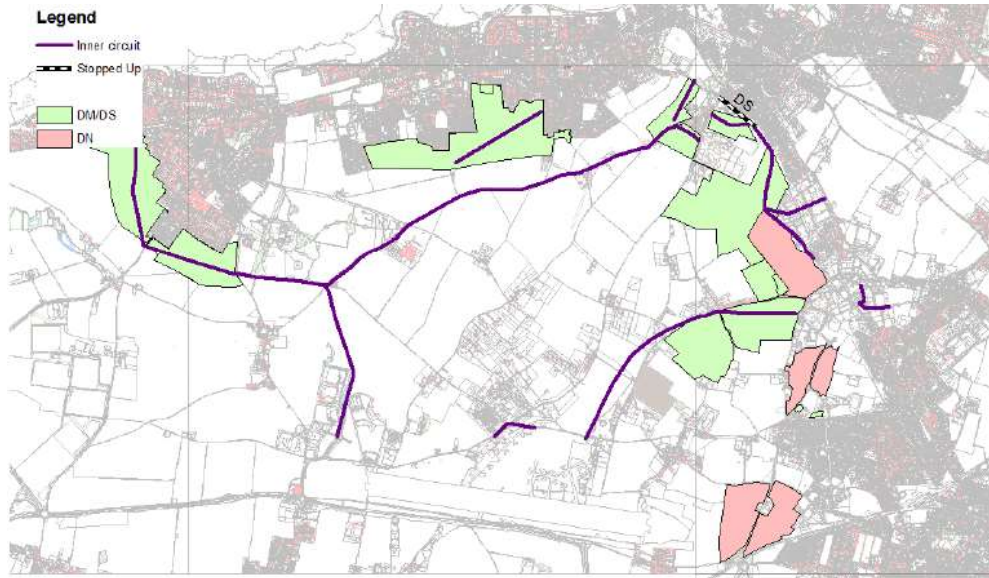


Figure 42 - Model Infrastructure Scenarios

A list of the proposed transport interventions included within each of the scenario is provided below:

Modelled Transport Interventions	2031 DN	2031 DM	2031 DS
Manston Green Network (including Staner Hill)	Yes	Yes	Yes
Spitfire Corner (upgraded from staggered crossroads)			Yes
Manston-Haine link (2.6km)			Yes
Brooksend-Shottendane link / Link through Westgate development / Shottendane- Hartsdown link			Yes
'Nash Rd network' including stopping up at Coffin House corner			Yes
Columbus Avenue extension			Yes
Acol traffic-calmed (all through traffic removed)			Yes
Enterprise Way link			Yes
Tesco link road / Millennium Way extension			Yes
Shottendane Road speed reduction (40mph from 60mph)			Yes

### 11.4 Headline Model Outputs

11.4.1 The total number of trips within the modelled area (travel demand) provides an indication in terms of the overall traffic impacts of each forecast scenario. The level of travel demand is intrinsically linked to the level of proposed development within each scenario; as such the travel demand within the Do Minimum and Do Something scenarios is the same. The table below provides a summary of total travel demand in the AM peak (busiest period) compared with baseline conditions:



AM Peak	2016	2031 DN	2031 DM/DS
Total	22,466	25,007	28,428
% increase over Base		11%	27%
% increase over DN			14%

11.4.2 In terms of more localised impacts, particularly on the A28 and A254/A256 corridors, the modelled scenarios indicate a general pattern, whereby, the peak hour traffic flows show an increase in the Do Minimum scenario versus the base; followed by a slight decrease in the Do Something scenario. This is not the case at all locations, however, and in some cases the Do Something scenario would observe no impact or an increase in flow when compared with the Do Minimum.

11.4.3 Graphs showing a comparison of AM peak (busiest peak) traffic flow at key links and junctions on the key corridors between the modelled scenarios are shown below:

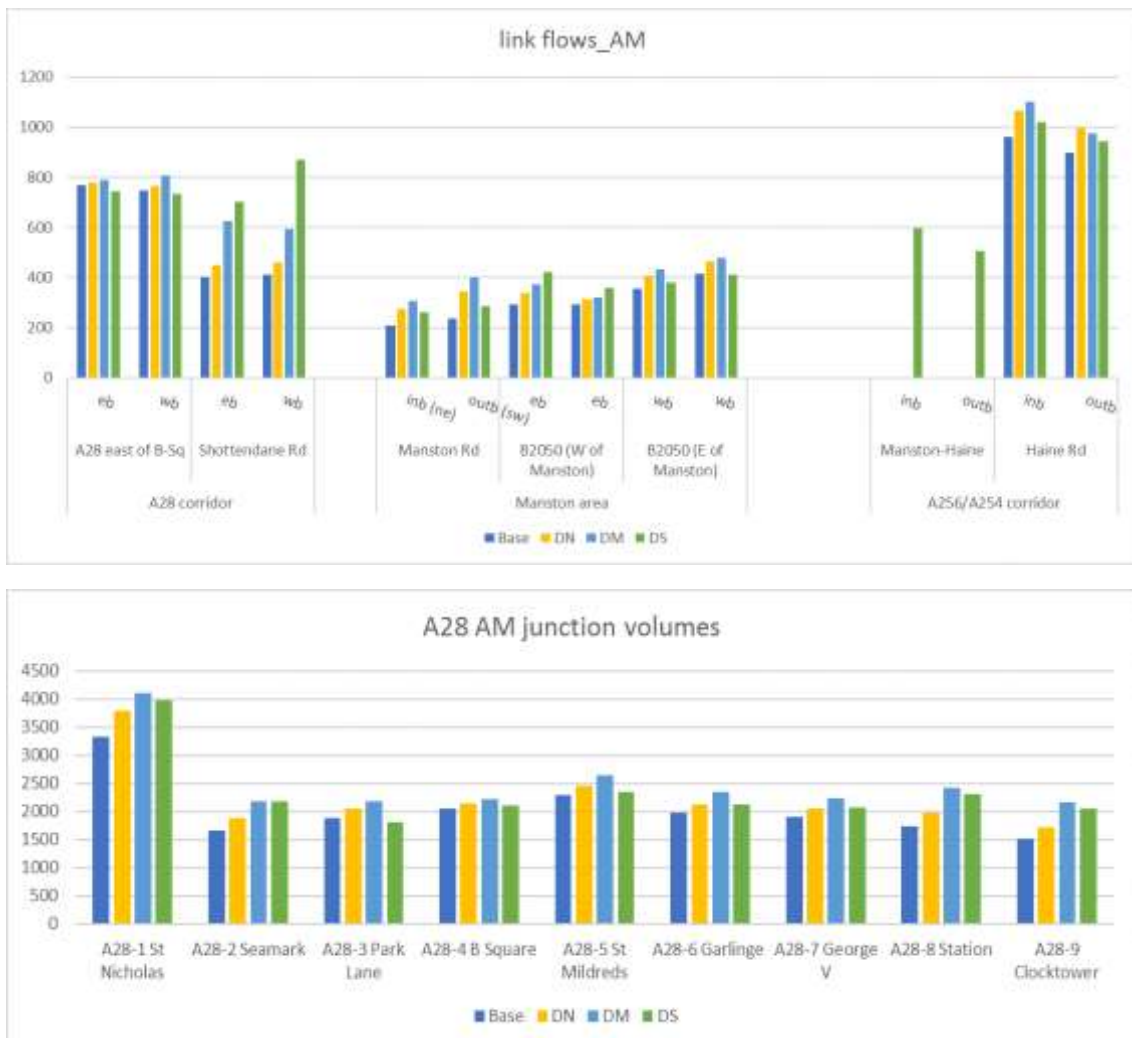


Figure 43 - Traffic Flow on the Local Highway Network

- 11.4.4 The provision of the ICRIS has a positive impact on flows within the A28 corridor through Birchington Square. There is also a reduction in flow through Park Lane (when compared to the do minimum scenario), which currently contributes towards a significant level of delay on the A28 through right turning traffic and blocking back. Flows at the A28 St Mildred's junction are reduced,
- 11.4.5 The impact of the Local Plan allocations within Margate Seafront are likely to be reduced by the ICRIS, however remain above the baseline, which suggests that despite these improvements junction performance will continue to be impacted by the Local Plan growth and that alternative routes avoiding this part of the network should be explored.
- 11.4.6 St Nicholas Roundabout will be subject to material increases in traffic flow, however a visual inspection of this junction suggests that a level of residual capacity exists, which with minor modifications is likely to be accommodated. This will be investigated in more detail within future route studies and as more detailed transport assessments are undertaken in relation to strategic development sites as they progress.
- 11.4.7 The provision of a new road link between the B2050 Manston Road and A256 Haine Road, manages future flow increases to the existing Haine Road Corridor (A256) between Cliffsend and Westwood.

## 11.5 Conclusions

- 11.5.1 The future year forecasting stemming from the model notes that demand for travel on roads in Thanet will inevitably increase even if only as a consequence of an increase in car ownership and population over time, the flows on the principal road network will generally be managed by the provision of the ICRIS, however further detailed modelling of individual junctions will need to be undertaken as necessary.
- 11.5.2 It is important to note that this testing has been employed to inform broad options for disposition of development and possible need for junction improvements. Identification of preferred site allocations will be based on consideration of a range of factors in addition to transport considerations. Further modelling will be applied as necessary to test preferred site locations and explore solutions to address identified pinch points.

## 12 Potential Sources of Funding

The transport interventions outlined within this strategy are ambitious, however they are also considered to be realistic and achievable. There are a number of economic circumstances that can have an impact on the availability of funding for highway infrastructure. A draft Infrastructure Delivery Plan (IDP) is being prepared to support the forthcoming local plan, which will provide more detail on specific infrastructure elements and how they relate to specific development proposals within the district.

### 12.1 External Funding

- 12.1.1 There are a range of potential funding streams that can be accessed. With new funds being announced on a regular basis (often to very tight submission timescales), it is important for both KCC and TDC to be in a position to submit high quality bids at relatively short notice if required.
- 12.1.2 Such funds are available through Department for Transport (DfT), competitive funding through bodies such as South East Local Enterprise Partnership (SELEP) and Housing and Communities Agency (HCA), along with more direct funding from Developers through the planning process.
- 12.1.3 External funding streams are generally announced on a regular basis, normally through central government departments. Local Growth Fund (LGF) was one such fund and to date. Across the county, KCC have successfully secured nearly £120m from LGF. This demonstrates that certain elements of infrastructure may not necessarily need to be funded directly by developers.
- 12.1.4 Smaller Interventions such as cycleway or public rights of way improvements can be subject to consideration under annual Local Transport Plan funding within KCC. This fund is variable from year to year and is subject to set funding criteria in accordance with their contribution toward strategic priorities.

### 12.2 Developer Funding

- 12.2.1 Through the development planning process, contributions can be sought towards infrastructure under Section 106 (s106) of the Town and Country Planning Act 1990. Local Planning Authorities at both tiers of local government can enter into a legally binding agreements with the landowners/developers to financially contribute towards infrastructure or services required to make their development acceptable in planning terms. KCC/TDC then receive this funding to deliver infrastructure projects tied to development, for instance it may be used to support a public transport service or provide a proportionate contribution towards a new road link.
- 12.2.2 The draft Local Plan proposes that section 106 agreements should be used to fund key infrastructure projects such as the ICRIS. The council is intending to use Community Infrastructure Levy (CIL) to fund smaller infrastructure projects.

- 12.2.3 The CIL is a similar methodology to s106, however this represents a fixed charge which is then applied to specific types of development for specific infrastructure projects (through a roof tax type approach). The nature and level of funding can be defined during the establishment of the CIL Charging Scheme.
- 12.2.4 Developer contributions can still be secured through s106 Agreements where a CIL charge also applies but the two mechanisms are not currently able to be used to fund the same infrastructure project.
- 12.2.5 An alternative method of delivering physical transport infrastructure is through direct delivery/construction by developers through planning obligations. A Section 278 or 38 (of the Highways Act 1980) agreement can be entered into which allows developers to either make modifications to or build new highway infrastructure for adoption by KCC.

# **Appendix A**

## **Achievements from the Thanet Transport Plan 2005 – 2011**

Measure	Timescale	Funding Source	Description/Progress
East Kent Access Phase 2 (A256/299)	2006 -2012	LTP	Completed - Improvement of the A299 between Minster roundabout and the Lord of the Manor junction, and improvement of the A256 from Lord of the Manor junction to the old Richborough Power Station site. The scheme cost £87m funded by the DfT with £5.75m from KCC. Work began on site in 2009 and the official opening took place on 23 <sup>rd</sup> May 2012.
Westwood Cross access study	2005	TDC	Part implemented then superseded by Westwood Relief Strategy.
Manston Access	2005	Developer/LTP funding	Superseded by Thanet Transport Strategy 2015. - Improved local access to Kent International Airport and environmental measures to protect Manston and other villages.
Stour Valley Line upgrade study	2005	EK Partnership	Study completed - Undertake a study into the feasibility and costs of upgrading the Stour Valley Line railway between Thanet, Canterbury and Ashford as an alternative to the A28.
Freight routes	2005-6	TDC/KCC	Not completed. As part of the Freight Action Plan for Kent the preferred freight routes will be mapped and distributed. - Identify, sign and publicise strategic freight routes within the District.
Seek further ferry operator(s)	Ongoing	Officer time	Not completed - Seek a ferry operator.
Review traffic management options for Military Road	2005-6	Officer time	Change of use – now more café culture and pedestrian area with better integration with the tourist industry
Review potential bus/coach link between port and station	2005	Officer time	Not currently required. Ferry service has since closed.
Update Airport Master plan	2005	Privately funded	Completed - In November 2009, Manston Airport produced a Master plan to consider the growth at the airport up to 2018. - However, following subsequent sale and closure of Airport in 2014 it is now intended to assessing alternative options for development of the airport land.
Update Airport Travel Plan	2005-10	Privately funded	Not completed due to several changes of operators and future proposals for airport not materialising.
Traffic management/reduction measures	2005-10	Joint private/public funding	Completed - On behalf of KCC, Stagecoach operate the route 38/38A services between the airport, Ramsgate, Broadstairs and Birchington.
Bus link to Ramsgate rail station	2005	Privately funded	The Stagecoach Thanet Loop bus service runs past Ramsgate Station (approx. every 10 minutes)
Promote, protect and enhance walking/riding network around KIA, Manston	Ongoing	Officer time and private funding	Part completed - No longer pursued as circular route. Improvements sought as part of general PROW enhancements.
Roadside infrastructure improvements on Quality Bus Corridors	2005-6	UBC?LTP funding	Mostly completed •Margate–Westwood–Ramsgate (A254) •Margate–Broadstairs–Ramsgate (A255) •Margate/Ramsgate–Canterbury (A28) Improvements to roadside infrastructure on the Quality Bus Corridors where not provided for the new Thanet Loop service.
Real Time Passenger Information and bus priority at traffic signals	2005	Developer funding	Not completed - RTI no longer favoured by bus operator. New information methods under review Extension of bus priority at traffic signals on all major corridors.

Measure	Timescale	Funding Source	Description/Progress
Super Low Floor vehicles for Thanet – Canterbury Quality Corridor	2006	Private/public funding	8/8A (the main routes from Broadstairs/Margate to Canterbury - every 15 minutes) went 100% low floor in early 2009
Continue discussions on C.T.R.L. Domestic Service	Ongoing 2009 to	Officer time	Completed domestic services on the high speed line began in December 2009 under a franchise agreement with South-eastern. Passengers can now get from Ramsgate to St Pancras International in just 1 hour 16 minutes, and journey times from other Thanet stations similarly reduced. Continue discussions to ensure an appropriate CTRL Domestic service to Thanet.
Lobby for localised East Kent service	Ongoing 2009 to	Officer time	Domestic services on the high speed line began in December 2009 under a franchise agreement with Southeastern. Passengers can now get from Ramsgate to St Pancras International in just 1 hour 16 minutes, and journey times from other Thanet stations similarly reduced. Continue to lobby for a localised rail service for East Kent connecting into the CTRL DS.
Bus link to K.I.A	2005	Privately funded	Not completed - Encourage provision of an improved Local Bus Service between Ramsgate Station and Kent International Airport.
Investigate “Manston Parkway” station		Privately funded	Completed - Funding is largely secured and plans are being investigated for the Parkway station. An 8 week public consultation exercise is being undertaken in early 2015.
Review restriction controls (Government request)	2005	TDC	Review restriction controls after Government request on hackney carriage vehicles - an independent unmet demand survey was undertaken in 2007 by Halcrow Group Limited. As a result of that survey it was found that there was no unmet demand and the Licensing Board decided to continue restricting the number of hackney carriage vehicles
Encourage provision for taxis at out of town stores	2005	TDC	Encourage out of town supermarkets to provide specific facilities for taxis at out of town stores - there has been continuing dialogue with the Westwood Cross management company although these being private roads they are responsible for the provision of ranks within Westwood Cross
Review of Hackney Carriage Ranks	2005	TDC	A review of Hackney Carriage Ranks. (cost of signage) - this was included within the remit of the 2007 survey which concluded that there were sufficient ranks within Thanet.
25% of vehicles with disabled access	2005	Staff time	25% of vehicles suitable for disabled access. Gradual increase until 2013 to 50%
Implement ‘Turner – Dickens a Flagship Walking Route for Thanet’	Ongoing 2007 –	TDC	Completed - The Turner and Dickens Walk is now open and promoted, connecting Margate and Broadstairs
Provide drop kerbs, tactile surfaces, etc.	Ongoing	LTP	Largely completed - continue to provide dropped kerbs and tactile surfaces, where appropriate, as part of the footway maintenance and renewal programme.
Promote walking	Ongoing	TDC/KCC/PCT	Promote walking as a healthy alternative to the car for short journeys, including investigating with the Health Authority, opportunities for the wider availability of pedometers.

Measure	Timescale	Funding Source	Description/Progress
Measures to encourage walking	Ongoing	Officer time	Implement measures to encourage walking such as street seats, improved street lighting, signage and removing obstacles and trip hazards.
Implement "Feet First" network	Ongoing to 2011	LTP and private funding	Progressively implement the network of multi-purpose walking routes detailed in "Feet First" through a series of "street audits" and engaging outside parties, where appropriate.
Implement the Dane Valley cycle route network	2004-7	LTP	The Dane Valley cycle route network has been expanded since the 1 <sup>st</sup> Transport Strategy.
Promote cycling	Ongoing	LTP	Continue to promote cycling as a healthy alternative to the car for work and leisure journeys.
Continue work with Thanet Cycling Forum	Ongoing	Officer time	Continue to work with the Thanet Cycling Forum to promote and encourage cycling.
Implement Thanet Cycling Plan	2005-11	LTP, DfT, private funding	Part completed - The network has been expanded but the planned network in the Cycling Plan has not been fully achieved, partly due to insufficient funding. Progressively implement the planned programme of new and improved cycle routes detailed in the Thanet Cycling Plan and this Transport Strategy through KCC's Local Transport Plan, various DfT initiatives and other public sources of funding. Also to pursue developer contributions, where possible, as part of the planning process.
Implement TDC Staff Travel Plan	2005		Not completed - Implement a Staff Travel Plan for T.D.C. bus concessions offered but not taken up by staff
Work with KCC and schools on School Travel Plans	Ongoing	Officer time	Ongoing - Work with KCC and local school communities to encourage the adoption of School Travel Plans for all Thanet schools.
Work with local businesses on Workplace Travel Plans	Ongoing	Officer time	Part Completed – KCC initiatives to encourage sustainable travel have been implemented such as FAXI and Workplace Challenge.
Require Travel Plans in support of planning applications	Ongoing	Officer time	Ongoing - Travel Plans are requested for significant developments. The smaller sites are required to produce a sustainable travel statement to show how they plan to encourage sustainable travel, and the larger sites must produce a Travel Plan that will be monitored by KCC.
Explore scope for sustainable events travel plan	2005 onwards	Officer time	Part completed - the scope for sustainable tourism and an events travel strategy. Continue to explore and develop
Produce new Parking Policy	2006	Officer time	Part completed - A major parking review was launched in Autumn 2012. Produce a new comprehensive parking policy, taking account of the issues facing Thanet, as outlined elsewhere in this strategy.
Assess demand and locations	2005 onwards	Officer time	Part completed - Assess demand and identify possible Home Zone locations, in conjunction with the local community.
Assess and prioritise requests for Homezones	Ongoing	Officer time	Part completed – very few if any applications received for home zones. Shared surfaces more commonly received.
Review existing schemes	Ongoing	Officer time	Completed - Review existing schemes
Evaluate new DfT regulations and guidance	2005	Officer time	Completed – new guidance adhered to.



Measure	Timescale	Funding Source	Description/Progress
Continue monitoring of Nitrogen Dioxide and PM10 at key locations	Ongoing	Officer time	Completed - The district has two junctions where nitrogen dioxide levels are recorded above the recommended level. This led to the declaration of an urban area Air Quality Management Area in 2011. - To continue monitoring of nitrogen dioxide and PM10 at key locations. The work to identify problem areas has yet to be completed. It is expected that the Detailed Assessment may confirm that there will be locations within Thanet where air quality standards are breached because of traffic related pollutants. Once these locations are identified appropriate transport Action Plans will need to be developed with the aim of reducing traffic emissions and achieving acceptable local air quality.
Explore future development and funding with Thanet C.T.	Ongoing	Officer time	Work with the Trustees of Thanet Community Transport to explore future funding sources and to encourage the development of the service.
Work with partners to promote rural Wheels 2 Work for East Kent	2005	East Kent Partnership	Not completed - Work with Action with Communities in Rural Kent, Thanet C.T., the East Kent Partnership and other partners to launch a Wheels 2 Work scheme for rural East Kent.
Implement "Feet First" and Thanet Cycling Plan	2005-11	See sections 10 and 11	The cycling network has been expanded but the planned network in the Cycling Plan has not been fully achieved, partly due to insufficient funding. Feet First – Part completed - Progressively implement the measures contained in the "Feet First" and Thanet Cycling Plan to improve safety/security for pedestrians and cyclists.
Work with rail operator to improve safety/security	Ongoing	See section 8	Part completed - Work with the rail operator to improve safety and security on and around Thanet's rail stations and on board trains.
Work with bus operators to improve safety/security	Ongoing	See sections 7 and 19	Completed - Working with commercial bus operators and Thanet Community Transport to improve safety/security on buses.
Safety audit of bus stops	2006-7 onwards	LTP and Officer time	Completed – "safety audit" of bus stops carried out to identify any improvements in location, street lighting, etc. to improve safety for bus passengers.
Implement and promote 'Manston Rides' project	2005-6	LTP/developer	Not completed. Local public right of way and permissive paths maintained and explored for expansion through new development
Identify a further network of riding routes	2005 onwards	Officer time	Not completed. - Identify a further network of on and off road routes.
Implement speed reduction measures	Ongoing	See section 16	Not completed - Implement speed reduction measures on appropriate rural roads used by riders.

# Appendix B

## Policy Context

## National Policy

National Planning Policy Framework (July 2018):

The revised NPPF carries forward many of the principles relating to planning and transport that were present in the previous version:

It says that transport issues should be considered from the earliest stages of plan-making and development proposals, so that:

- a) the potential impacts of development on transport networks can be addressed;
- b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;
- c) opportunities to promote walking, cycling and public transport use are identified and pursued;
- d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and
- e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.

The guidance states that the planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. Planning policies should be prepared with the active involvement of local highways authorities, other transport infrastructure providers and operators and neighbouring councils. Where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development should be identified and protected.

The NPPF also addresses car-parking standards and says that these should take into account:

- a) the accessibility of the development;

- b) the type, mix and use of development;
- c) the availability of and opportunities for public transport;
- d) local car ownership levels; and
- e) the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.

Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport.

## Local Policy

### Thanet Local Plan

The District Council is preparing a new Local Plan to guide development and investment in the district over the period to 2031. This plan will establish the level of growth in the district over that period including the amount of new homes and job creating development to be planned for. It will also identify where development should take place and make appropriate land allocations.

In promoting sustainable development, the new Local Plan will need to take account of Thanet's existing settlement pattern and transport links which have established over a considerable time. It will also need to take account of or review as appropriate land allocations made in the previous Local Plan. For example that Plan allocated land for 1,000 new homes at Westwood, and following grant of planning permission that development is expected to start shortly.

The draft Local Plan allocates land for 17,140 dwellings at different locations across the district, and retains key employment sites, including Manston Business Park and parts of the EuroKent Business Park from the previous Local Plan.

# **Appendix C**

## **Infrastructure Proposals**

Type	Description	Reason	Potential Funding Source	Cost*
Road	Create New Road Link Between A28 Brooksend Hill and Minnis Road.	To manage congestion at Birchington Square and offer alternative routes to Birchington seafront areas improving Air Quality	(S38)(S106)	On Site
Road	Create New Road link between A28 Brooksend Hill and Acol Hill/B2050.	To manage traffic congestion at Birchington Square and A28 Corridor and form the start of major new road corridor to Westwood	On Site (S38)(S106)	On Site
Road	Widen B2050 Manston Road between junction with Acol Hill and Shottendane Road.	To manage traffic congestion at Birchington Square and A28 Corridor and form the start of major new road corridor to Westwood	On Site (S38)(S106)	£5,000,000
Road	Widen / provide necessary localised Improvements to Shottendane Road as far as the vicinity of Firbank Gardens	To manage traffic congestion at Birchington Square and A28 Corridor and form the start of major new road corridor to Westwood.	S106 / External	£15,000,000
Road	Create new road link between Shottendane Road / Manston Road. Close off Shottendane Road at junction with Manston Road.	To manage traffic congestion at Birchington Square and A28 Corridor and form the start of major new road corridor to Westwood Avoiding Coffin House Corner Junction	On Site (S38)(S106)	On Site
Road	Create new road link between Manston Road and Nash Road behind Salmestone Grange and close off Nash Road at its junction of Coffin House Corner.	To manage traffic congestion in locality and form the start of major new road corridor to Westwood Avoiding Coffin House Corner Junction	On Site (S38)(S106)	On Site
Road	Reconfigure Coffin House Corner Signal Junction. Close off Nash Road Arm and improve capacity and pedestrian facilities.	To reduce journey time / congestion whilst providing safer access for children walking to school	S106 / S278	£500,000
Road	To reconfigure roundabout at Queens Avenue/Tivoli Road/Grosvenor Gardens and introduce one-way flow on Queens Avenue	To improve safety at junction and facilitate re-routing of tourist traffic bound for Seafront and Margate Old Town	S106	Completed
Road	Marine Terrace Public Realm Improvements (only if funded externally)	Environmental / regeneration - Improve pedestrian environment	External Funding	£16,000,000
Road	To re-route tourist traffic away from Margate seafront, by providing junction improvements and potentially reintroducing two way flow to Tivoli Road.	To manage traffic congestion at Clock tower junction and reduce journey times	S106 / CIL	£3,000,000

Type	Description	Reason	Potential Funding Source	Cost*
Road	Reconfigure Victoria Traffic Signal junction	To manage journey times and relieve congestion	S106 / CIL	Nominal
Road	Widen Nash Road along its existing alignment to new LDR Standard	To manage traffic congestion on A254 Corridor by facilitating major new road corridor to Westwood Avoiding Coffin House Corner Junction	S278 / 38 On Site	On Site
Road	Connect Enterprise Road to Nash Road	To provide access to employment and retail destinations, and to manage traffic impact at Westwood and Victoria Traffic signals	S278 / 38 / S106	£1,000,000
Road	Upgrade Tesco internal link road to adoptable standard between Westwood Road and Margate Road. Extend Millennium Way to New Link Road	To relieve Westwood roundabout and A256 Westwood Road Corridor for journeys between Ramsgate and Broadstairs	External Funding	£8,000,000
Road	Create new road between Toby Carvery Roundabout (A256) and B2050 (Across Northern Grass within Manston Airport site) to provide relief to Haine Road Corridor. Improve approach and roundabout at Westwood Cross to increase capacity	To provide enhanced access to Westwood, manage congestion and relieve the A256 Haine Road Corridor.	S106 / Part On Site	£12,000,000 (Off site Section)
Road	Improvements Spitfire junction.	To manage safety at this junction	S278	£1,000,000
Road	To extend Columbus Avenue to Manston Road Birchington.	Improve road capacity to meet increased surface transport movements associated with future development.	S106 / External	£10,000,000
Road	Improvements to Dane Court Road / Westwood Road Junction to improve journey time reliability.	To manage traffic congestion on the A256 / A255 road corridors	CIL / S106	£1,000,000
Road	To investigate High Street, St. Lawrence/ Newington Road junction to improve air quality and address congestion.	To manage congestion improve Air Quality (Signage Scheme)	S106	£50,000
Road	New Link Road through Manston Green Site and Junction improvements at Manston Road / Haine Road Roundabout	To provide access to development site and manage congestion on the A256 Haine Road Corridor	S106 / External	£3,000,000

Type	Description	Reason	Potential Funding Source	Cost*
Cycle	Creation of a New Shared Cycleway on the A28 Between Birchington & Garlinge	To connect new communities and provide access to secondary schools.	S106 / CIL / LTP	TBC
Cycle	Improvements to Westwood main junction and adjacent roads to improve bus and cycle provision and improve accessibility and movement for pedestrians between different areas of Westwood Town Centre	To provide better bus access and a more walkable town centre.	S106 / CIL / LTP	TBC
Cycle	Construct shared facility on Sloe Lane, Margate.	Improve sustainable transport links between Dane Valley and Westwood to encourage cycle use.	S106 / CIL / LTP	TBC
Cycle	Create shared facility on existing path to the R/O Bromstone School, Broadstairs to connect to Millennium Way to offer alternative to cycling on Rumfields Road.	Improve sustainable transport links between Broadstairs and Westwood to encourage cycle use for retail, leisure and education trips.	S106 / CIL / LTP	TBC
Cycle	Create shared facility on existing footpath between Ramsgate Road, Broadstairs and Dumpton Park Drive, Broadstairs to the side of former Holy Cross School.	Improve cycle links to East Kent College	S106 / CIL / LTP	TBC
Cycle	From Ramsgate Railway Station create shared facility on existing footpath to Newington Road.	Improve cycle links to Ramsgate Station for surrounding residential catchments	S106 / CIL / LTP	TBC
Cycle	From east of Ramsgate Railway Station create shared facility on existing path to Margate Road, provide crossing facility to access Newlands Road and create link to Pysons Road using Newlands Lane.	Provide better linkage between local schools and Ramsgate Rail Station.	S106 / CIL / LTP	TBC
Cycle	Off road section between Convent Road, Broadstairs and the existing off road shared facility further along Joss Gap Road (on edge of golf course).	To complete missing section of Viking Coastal Trail - Improve attractiveness of this route and safety.	S106 / CIL / LTP	TBC
Cycle	Between Dent-de-Lion Road, Garlinge and Park Road, Birchington creating shared facility on existing public rights of ways.	Provide better cycle access / connectivity between new development site and wider PROW network.	S106 / CIL / LTP	TBC
Cycle	Creation of shared facility on south east side of Dane Park, Margate to link Dane Valley cycle route with Northdown Road, via St Dunstan's Avenue.	Improve cycle access to Dane Park and Retail and residential destinations in Cliftonville	S106 / CIL / LTP	TBC



Type	Description	Reason	Potential Funding Source	Cost*
Cycle	Creation of a shared facility between Canterbury Road West, Ramsgate and Canterbury Road East using existing bridge facility to the east of Haine Road and north of Canterbury Road East.	To link Cliffsend to wider highway network. Improve access to Mixed use development on Former Manston Airport Site	S106 / CIL / LTP	TBC
Cycle	Provide missing shared facility on SW side of St Peter's Road between Broadley Road and Lister Road, Margate.	Improve Cycle links between Broadstairs including QEQM Hospital	S106 / CIL / LTP	TBC
Cycle	Provide new shared facility between Durlock and Sevenscore as alternative to Grinsell Hill/ The Lanes/Foxborough Lane.	Provide enhanced connectivity between Minster and Cliffsend to future Thanet Parkway Station	S106 / CIL / LTP	TBC
Cycle	Upgrade footpath TM31 to bridleway to link to bridleway TE12A & link to Shottendane Road improvements to provide shared use pedestrian cycle route.	Provide better connectivity between development settlements	S106 / CIL / LTP	£165,000
Cycle	Improvement of Bridleway TM22 surface to width of 3m as part of Garlinge development.	Link Garlinge and Strategic Allocations to wider highway network	S106 / CIL / LTP	£79,000
Cycle	Upgrade Footpath TM14 on edge of development to Bridleway.	Link Garlinge and Strategic Allocations to wider highway network	S106 / CIL / LTP	£61,000
Cycle	Provide improved surface and widen Bridleway TM11	Link Garlinge and Strategic Allocations to wider highway network	S106 / CIL / LTP	£89,000
Cycle	Provide improved surface and widen Bridleway TM16	Link Garlinge and Strategic Allocations to wider highway network	S106 / CIL / LTP	£140,000
Cycle	Upgrade Footpath TR24 to Bridleway —Crossing point required on Manston to Haine Road Link.	To Provide linkage between allocation sites and Westwood	S106 / CIL / LTP	£208,000
Cycle	Upgrade Footpath TR9 to Bridleway	To Link Former Manston Airport allocation to Manston Green and wider Highway network	S106 / CIL / LTP	£46,000
Cycle	Improve surface of Bridleway TR8 and widen to 3m	To Link Former Manston Airport allocation to wider highway network including Manston to Haine Road	S106 / CIL / LTP	£132,000
Cycle	Creation of new Bridleway and Improve TR32 to link development to future Parkway Station	To provide linkage between development site and Parkway Station	S106 / CIL / LTP	£98,000
Cycle	Improve surface of Bridleway TR10 and widen to 3m	To Link Former Manston Airport allocation to Manston Green and wider Highway network	S106 / CIL / LTP	£143,000

Type	Description	Reason	Potential Funding Source	Cost*
Rail	Thanet Parkway – New station with 300 parking spaces to be located at Cliffsend	To relieve parking problems around existing stations and to serve future needs of Local Plan growth Discovery Park directly	External (LGF) Private Funding	£21,400,000

\*It should be noted that all infrastructure costs are considered draft at this stage and will be subject to change as projects are refined/progressed.



FOI  
NEL CSU  
Kent House - 4th Floor  
81 Station Road  
Ashford  
TN23 1PP

[REDACTED]  
[REDACTED]  
11<sup>th</sup> February 2019

Email: [NELCSU.foi@nhs.net](mailto:NELCSU.foi@nhs.net)  
[www.thanetccg.nhs.uk](http://www.thanetccg.nhs.uk)

**Our Ref: FOI.18.THA199**

Dear [REDACTED]

**RE: FREEDOM OF INFORMATION REQUEST**

Thank you for your request for information under the Freedom of Information Act 2000 received on 15<sup>th</sup> December 2018 by NHS Thanet Clinical Commissioning Group (CCG). The information you have requested is listed below together with the response:

**Could you please provide information about all correspondence you have had and any members of the Thanet Clinical Commissioning Group have had with RiverOak Strategic Partners including but not limited to any of their associated companies and/or professional advisors and/or any third party.**

**Clarification Requested:** Can we please have clarification of your meaning of 'the members of the Thanet Clinical Commissioning Group'. The NHS Thanet CCG's understanding of the word 'members', as stated in their Constitution (page 7; section 3 – Membership), would be the GP practices.

**Clarification Received:** I meant members as you have defined and the individuals that make up the CCG's governing body.

I can confirm NHS Thanet CCG does hold this information. I can confirm, as far as they are aware, no NHS Thanet CCGs Governing Body member has had any correspondence with RiverOak Strategic Partners or any of their associated companies and/or professional advisors and/or any third party.

With regard to the NHS Thanet CCG GP Practices, I can confirm NHS Thanet CCG does not to hold this information. Therefore you may wish to redirect this part of your request to the individual GP Practices, who should be able to answer it for you. Their contact details can be found on the following link:

<https://www.thanetccg.nhs.uk/about-us/publications/?assetdet8f69bb2e-477d-4a1d-9070-609ed325f716=373306&categoryesctl8f69bb2e-477d-4a1d-9070-609ed325f716=16633>

[REDACTED]  
[REDACTED]

We hope that this has dealt with your request for information however, should you remain dissatisfied, you have the right to request that we conduct an internal review of the way we have handled your request. If you would like us to conduct such a review please contact us within two months of this letter:

Email [NELCSU.foi@nhs.net](mailto:NELCSU.foi@nhs.net) or

**FOI-Internal Review Request**  
**NEL CSU**  
**Kent House - 4th Floor**  
**81 Station Road**  
**Ashford**  
**TN23 1PP**

Your request for an internal review will then be processed in accordance with our Freedom of Information Policy.

If you are still dissatisfied following the internal review, you have the right under Section 50 of the Freedom of Information Act (2000) to appeal against the decision by contacting the Information Commissioner. The Information Commissioner provides full and detailed guidance on the Freedom of Information Act and on when and how to complain.

Please find below the link to their website page and their helpline number.

<https://ico.org.uk/for-the-public/official-information/>

Helpline number: 0303 123 1113 or 01625 545745

In line with the Information Commissioner's directive on the disclosure of information under the Freedom of Information Act 2000 your request will form part of our disclosure log. Therefore, a version of our response, which will protect your anonymity, will be posted on the NHS Thanet Clinical Commissioning Group website.

Yours sincerely

**Freedom of Information Team**  
**NEL CSU**

This Freedom of Information request has been processed by NEL CSU on behalf of

**NHS Thanet Clinical Commissioning Group**  
**Thanet District Council**  
**Cecil St**  
**Margate**  
**Kent**  
**CT9 1XZ**

NEL CSU is NEL Commissioning Support Unit and is hosted by NHS England. NEL CSU provides a number of administrative functions including managing Freedom of Information Requests.

The four clinical commissioning groups (CCGs) in east Kent are working together to improve healthcare across their communities.

NHS Ashford CCG - NHS Canterbury and Coastal CCG - NHS South Kent Coast CCG - NHS Thanet CCG

Weekly Law Reports (ICLR)/2015/Volume 1 /\*East Northamptonshire District Council and others v Secretary of State for Communities and Local Government and another - [2015] 1 WLR 45

[2015] 1 WLR 45

**\*East Northamptonshire District Council and others v Secretary of State for Communities and Local Government and another**

**Court of Appeal**

[2014] EWCA Civ 137

**2014 Jan 23; Feb 18**

**Maurice Kay, Sullivan, Rafferty LJJ**

*Planning -- Planning permission -- Development affecting listed building -- Application for planning permission for wind farm development close to Grade I listed buildings -- Requirement on decision-maker to "have special regard to the desirability of preserving" setting of listed buildings -- Inspector finding benefit of proposed development outweighing harm to buildings and granting permission -- Whether statutory duty requiring inspector to give considerable importance and weight to desirability of preserving setting of listed buildings when carrying out balancing exercise -- Whether applying with particular force where setting Grade I listed building affected -- Relevance of finding that harm to setting less than substantial -- Relevance of perception of any reasonable observer -- Whether inspector's decision flawed -- Whether rightly quashed -- Planning (Listed Buildings and Conservation Areas) Act 1990 (c 9), s 66(1)*

The local planning authority refused the developer's application for planning permission to build a four-turbine wind farm on land in a conservation area which contained a number of listed buildings including a collection of Grade I listed buildings and gardens. The developer appealed to the Secretary of State for Communities and Local Government, who appointed a planning inspector to determine the appeal. By section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990<sup>1</sup> the inspector was under a duty when considering whether to grant planning permission to "have special regard to the desirability of preserving" a listed building or its setting. Listed buildings came within the definition of "designated heritage assets" in the Government's Planning Policy Statement 5<sup>2</sup> and practice guide. The inspector concluded that while the wind farm would fall within and affect the settings of a wide range of heritage assets, on balance the significant benefits of the proposed development in terms of the renewable energy which it would produce outweighed the less than substantial harm which it would cause to the setting of such designated heritage assets and the wider landscape, and accordingly granted planning permission. One of the reasons given for the inspector's conclusion that the harm would be less than substantial was that "any reasonable observer" would know that the development was a modern addition to the landscape, separate from the planned historic landscape or building he was within or considering or interpreting. The judge granted an application by, among others, the local planning authority under section 288 of the Town and County Planning Act 1990 to quash the inspector's decision on the ground that it was flawed because, among other things, he had failed to give effect to the duty under section 66(1) by not giving sufficient weight to the desirability of preserving the setting of the listed buildings.

On the developer's appeal--

*Held*, dismissing the appeal, (1) that section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 required the decision-maker to give "the desirability of preserving the building or its setting" not merely careful consideration

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for the purpose of deciding whether there would be some harm, but considerable importance and weight when balancing the advantages of the proposed development against any such harm; that that general duty applied with particular force if harm would be caused to the setting of a Grade I listed building, which was a designated heritage asset of the highest significance; that, if the harm to the setting of the Grade I listed building would be less than substantial, the strength of the presumption against the grant of planning permission would be lessened but it would not be entirely removed; that, since the planning inspector had not given considerable importance and weight to the desirability of preserving the setting of the listed buildings when carrying out the balancing exercise, he had not given proper effect to the section 66(1) duty; and that, accordingly, the judge had been right to conclude that the inspector's decision was flawed on that basis (post, paras 22, 23, 24, 26, 28, 29, 45, 46, 47).

*The Bath Society v Secretary of State for the Environment* [1991] 1 WLR 1303, CA and *South Lakeland District Council v Secretary of State for the Environment* [1992] 2 AC 141, HL(E) applied.

(2) That, to the extent that the application of the "reasonable observer" test had been the decisive factor in the inspector's reasoning for his conclusion that harm to the setting of the listed buildings was less than substantial, he had not properly applied the relevant Government policy guidance; that if it had not been the decisive factor he had not given adequate reasons for that conclusion; and that, accordingly, the judge had been right to conclude that the inspector's decision was flawed on that basis also (post, paras 43-44, 45, 46, 47).

Decision of Lang J [2013] EWHC 473 (Admin); [2013] 2 P & CR 94 affirmed.

The following cases are referred to in the judgment of Sullivan LJ:

*Bath Society, The v Secretary of State for the Environment* [1991] 1 WLR 1303; [1992] 1 All ER 28; 89 LGR 834, CA

*Heatherington (UK) Ltd v Secretary of State for the Environment* (1994) 69 P & CR 374

*R (Garner) v Elmbridge Borough Council* [2011] EWHC 86 (Admin); [2011] PTSR D25; [2011] EWCA Civ 891; [2012] PTSR D7, CA

*South Lakeland District Council v Secretary of State for the Environment* [1992] 2 AC 141; [1992] 2 WLR 204; [1992] 1 All ER 573; 90 LGR 201, HL(E)

*Tesco Stores Ltd v Secretary of State for the Environment* [1995] 1 WLR 759; [1995] 2 All ER 636; 93 LGR 403, HL(E)

No additional cases were cited in argument.

**APPEAL** from Lang J

By an application under section 288 of the Town and Country Planning Act 1990 the applicants, East Northamptonshire District Council (the local planning authority), English Heritage and the Na-

tional Trust, applied for an order to quash the decision of a planning inspector appointed by the Secretary of State for Communities and Local Government, by a decision letter dated 12 March 2012, allowing an appeal by the developer, Barnwell Manor Wind Energy Ltd, against the decision of the local planning authority dated 24 January 2011 to refuse its application for planning permission for a four-turbine wind farm in a conservation area. The Secretary of State conceded that the inspector's decision should be quashed and took no further part in proceedings. By order dated 11 March 2013 following judgment on 8 March 2013 Lang J [2013] EWHC 473 (Admin); [2013] 2 P & CR 94 granted the application on the basis grounds that the inspector (1) had failed under the duty in section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to and

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give considerable weight to the desirability of preserving the settings of listed buildings, including Lyveden New Bield; (2) had failed correctly to interpret and apply the policies in Planning Policy Statement 5; and (3) had failed to give adequate reasons for his decision.

By an appellant's notice dated 28 March 2013, the developer appealed, with permission of the judge, on the grounds that the judge (1) had erred in concluding that section 66(1) of the 1990 Act required the inspector to give considerable weight to the desirability of preserving the settings of the many listed buildings in the area; (2) had taken an over-rigid approach to the policy statement and practice guide which were not intended to be prescriptive; and (3) had erred in finding that the inspector had failed to give adequate reasons for his conclusion that the harm would in all cases be less than substantial.

The facts are stated in the judgment of Sullivan LJ.

*Gordon Nardell QC* and *Justine Thornton* (instructed by *Eversheds LLP*) for the developer.

*Morag Ellis QC* and *Robin Green* (instructed by *Sharpe Pritchard*) for the applicants.

The Secretary of State did not appear and was not represented.

The court took time for consideration.

18 February 2014. The following judgments were handed down.

## **SULLIVAN LJ**

### **Introduction**

**1** This is an appeal against the order dated 11 March 2013 of Lang J quashing the decision dated 12 March 2012 of a planning inspector appointed by the Secretary of State granting planning permission for a four-turbine wind farm on land north of Catshead Woods, Sudborough, Northamptonshire. The background to the appeal is set out in Lang J's judgment [2013] 2 P & CR 94 of 8 March 2013.

### **Section 66**

**2** Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 ("the Listed Buildings Act") imposes a "General duty as respects listed buildings in exercise of planning functions". Subsection (1) provides:



"In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses."

## Planning policy

3 When the permission was granted the Government's planning policies on the conservation of the historic environment were contained in Planning Policy Statement 5 ("PPS5"). In PPS5 those parts of the historic environment that have significance because of their historic, archaeological, architectural

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or artistic interest are called heritage assets. Listed buildings, scheduled ancient monuments and registered parks and gardens are called "designated heritage assets". Guidance to help practitioners implement the policies in PPS5 was contained in "PPS5: planning for the historic environment: historic environment planning practice guide". For present purposes, policies HE9 and HE10 in PPS5 are of particular relevance. Policy HE9.1 advised that:

"There should be a presumption in favour of the conservation of designated heritage assets and the more significant the designated heritage asset, the greater the presumption in favour of its conservation should be ... Substantial harm to or loss of a Grade II listed building, park or garden should be exceptional. Substantial harm to or loss of designated heritage assets of the highest significance, including scheduled monuments ... Grade I and II\* listed buildings and Grade I and II\* registered parks and gardens ... should be wholly exceptional."

Policy HE9.4 advised that:

"Where a proposal has a harmful impact on the significance of a designated heritage asset which is less than substantial harm, in all cases local planning authorities should: (i) weigh the public benefit of the proposal (for example, that it helps to secure the optimum viable use of the heritage asset in the interests of its long term conservation) against the harm; and (ii) recognise that the greater the harm to the significance of the heritage asset the greater the justification will be needed for any loss."

Policy HE10.1 advised decision-makers that when considering applications for development that do not preserve those elements of the setting of a heritage asset, they:

"should weigh any such harm against the wider benefits of the application. The greater the negative impact on the significance of the heritage asset, the greater the benefits that will be needed to justify approval."

## The inspector's decision

4 The inspector concluded, at para 22, that the wind farm would fall within and affect the setting of a wide range of heritage assets. For the purposes of this appeal the parties' submissions largely focused on one of the most significant of those assets: a site owned by the National Trust, Lyveden New Bield. Lyveden New Bield is covered by a range of heritage designations: Grade I listed building, inclusion in the register of parks and gardens of special historic interest at Grade I, and scheduled ancient monument.

5 It was common ground between the parties at the inquiry that the group of designated heritage assets at Lyveden New Bield was probably the finest surviving example of an Elizabethan garden, and that as a group the heritage asset at Lyveden New Bield had a cultural value of national, if not international significance. The inspector agreed, and found, at para 45: "this group of designated heritage assets has archaeological, architectural, artistic and historic significance of the highest magnitude."

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6 The closest turbine in the wind farm site (following the deletion of one turbine) to Lyveden New Bield was around 1.3 km from the boundary of the registered park and 1.7 km from the New Bield itself. The inspector found, at para 46:

"The wind turbines proposed would be visible from all around the site, to varying degrees, because of the presence of trees. Their visible presence would have a clear influence on the surroundings in which the heritage assets are experienced and as such they would fall within, and affect, the setting of the group."

This conclusion led the inspector to identify the central question, at para 46:

"Bearing in mind PPS5 policy HE7, the central question is the extent to which that visible presence would affect the significance of the heritage assets concerned."

7 The inspector answered that question in relation to Lyveden New Bield in paras 47-51 of his decision letter.

"47. While records of Sir Thomas Tresham's intentions for the site are relatively, and unusually, copious, it is not altogether clear to what extent the gardens and the garden lodge were completed and whether the designer considered views out of the garden to be of any particular significance. As a consequence, notwithstanding planting programmes that the National Trust have undertaken in recent times, the experience of Lyveden New Bield as a place, and as a planned landscape, with earthworks, moats and buildings within it, today, requires imagination and interpretation.

"48. At the times of my visits, there were limited numbers of visitors and few vehicles entering and leaving the site. I can imagine that at busy times, the situation might be somewhat different but the relative absence of man-made features in views across and out of the gardens compartments, from the prospect mounds especially, and from within the garden lodge, give the place a sense of isolation that makes the use of one's imagination to interpret Sir Thomas Tresham's design intentions somewhat easier.

"49. The visible, and sometimes moving, presence of the proposed wind turbine array would introduce a man-made feature, of significant scale, into the experience of the place. The array would act as a distraction that would make it more difficult to understand the place, and the intentions underpinning its design. That would cause harm to the setting of the group of designated heritage assets within it.

"50. However, while the array would be readily visible as a backdrop to the garden lodge in some directional views, from the garden lodge itself in views towards it, and from the prospect mounds, from within the moated orchard, and various other places around the site, at a separation distance of between one and two kilometres, the turbines would not be so close, or fill the field of view to the extent, that they would dominate the outlook from the site. Moreover, the turbine array would not intrude on any obviously intended, planned view out of the garden, or from the garden lodge (which has windows all around its cruciform perimeter). Any reasonable observer would know that the turbine array was a

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modern addition to the landscape, separate from the planned historic landscape, or building they were within, or considering, or interpreting.

"51. On that basis, the presence of the wind turbine array would not be so distracting that it would prevent or make unduly difficult, an understanding, appreciation or interpretation of the significance of the elements that make up Lyveden New Bield and Lyveden Old Bield, or their relationship to each other. As a consequence, the effect on the setting of these designated heritage assets, while clearly detrimental, would not reach the level of substantial harm."

**8** The inspector carried out "the balancing exercise" in paras 85-86 of his decision letter.

"85. The proposal would harm the setting of a number of designated heritage assets. However, the harm would in all cases be less than substantial and reduced by its temporary nature and reversibility. The proposal would also cause harm to the landscape but this would be ameliorated by a number of factors. Read in isolation though, all this means that the proposal would fail to accord with [conservation policies in the East Midlands regional plan ("EMRP")]. On the other hand, having regard to advice in PPS22, the benefits that would accrue from the wind farm in the 25-year period of its operation attract significant weight in favour of the proposal. The 10 MW that it could provide would contribute towards the 2020 regional target for renewable energy, as required by EMRP policy 40 and Appendix 5, and the wider UK national requirement.

"86. PPS5 policies HE9.4 and HE10.1 require the identified harm to the setting of designated heritage assets to be balanced against the benefits that the proposal would provide. Application of the development plan as a whole would also require that harm, and the harm to the landscape, to be weighed against the benefits. Key principle (i) of PPS22 says that renewable energy developments should be capable of being accommodated throughout England in locations where the technology is viable and environmental, economic, and social impacts can be addressed satisfactorily. I take that as a clear expression that the threshold of acceptability for a proposal like the one at issue in this appeal is not such that all harm must be avoided. In my view, the significant benefits of the proposal in terms of the energy it would produce from a renewable source outweigh the less than substantial harm it would cause to the setting of designated heritage assets and the wider landscape."

### Lang J's judgment

**9** Before Lang J the first, second and third applicants challenged the inspector's decision on three grounds. In summary, they submitted that the inspector had failed (1) to have special regard to the desirability of preserving the settings of listed buildings, including Lyveden New Bield; (2) correctly to interpret and apply the policies in PPS5; and (3) to give adequate reasons for his decision. The Secretary of State had conceded prior to the hearing that the inspector's decision should be quashed on ground (3), and took no part in the proceedings before Lang J and in this court.

[2015] 1 WLR 45 at 51

**10** Lang J concluded [2013] 2 P & CR 94, para 72 that all three grounds of challenge were made out. In respect of ground (1) she concluded, at para 39:

"in order to give effect to the statutory duty under section 66(1), a decision-maker should accord considerable importance and weight to the 'desirability of preserving ... the setting' of listed buildings when weighing this factor in the balance with other 'material considerations' which have not been given this special statutory status. Thus, where the section 66(1) duty is in play, it is necessary to qualify Lord Hoffmann's statement in *Tesco Stores Ltd v Secretary of State for the Environment* [1995] 1 WLR 759, 780 F-H that the weight to be given to a material consideration was a question of planning judgment for the planning authority."

Applying that interpretation of section 66(1) she concluded, at para 46:

"the inspector did not at any stage in the balancing exercise accord 'special weight', or considerable importance to 'the desirability of preserving the setting'. He treated the 'harm' to the setting and the wider benefit of the wind farm proposal as if those two factors were of equal importance. Indeed, he downplayed 'the desirability of preserving the setting' by adopting key principle (i) of PPS22, as a 'clear indication that the threshold of acceptability for a proposal like the one at issue in this appeal is not such that all harm must be avoided' (para 86). In so doing, he applied the policy without giving effect to the section 66(1) duty, which applies to all listed buildings, whether the 'harm' has been assessed as substantial or less than substantial."

**11** In respect of ground (2) Lang J concluded that the policy guidance in PPS5 and the practice guide required the inspector to assess the contribution that the setting made to the significance of the heritage assets, including Lyveden New Bield, and the effect of the proposed wind turbines on both the significance of the heritage asset *and* the ability to appreciate that significance. Having analysed the inspector's decision, she found, at paras 55-65, that the inspector's assessment had been too narrow. He had failed to assess the contribution that the setting of Lyveden New Bield made to its significance as a heritage asset and the extent to which the wind turbines would enhance or detract from that significance, and had wrongly limited his assessment to one factor: the ability of the public to understand the asset based on the ability of "the reasonable observer" to distinguish between the "modern addition" to the landscape and the "historic landscape."

**12** In respect of ground (3) Lang J found, at para 68, that the question whether Sir Thomas Tresham intended that the views from the garden and the garden lodge should be of significance was a controversial and important issue at the inquiry which the inspector should have resolved before proceeding to assess the level of harm. However, the inspector's reasoning on this issue was unclear. Having said in para 47 of his decision that it was "not altogether clear ... whether the designer considered views out of the garden to be of any significance", he had concluded, in para 50, that "the turbine array would not intrude on any obviously intended, planned view

*[2015] 1 WLR 45 at 52*

out of the garden, or from the garden lodge (which has windows all around its cruciform perimeter)." It was not clear from paras 70-71 whether this was a conclusion that there were no planned views (as submitted by the second defendant) or a conclusion that there were such views but the turbine array would not intrude into them.

### **The grounds of appeal**

**13** On behalf of the second defendant, Mr Nardell QC challenged Lang J's conclusions in respect of all three grounds. At the forefront of his appeal was the submission that Lang J had erred in concluding that section 66(1) required the inspector, when carrying out the balancing exercise, to give "considerable weight" to the desirability of preserving the settings of the many listed buildings, including Lyveden New Bield. He submitted that section 66(1) did not require the decision-maker to give any particular weight to that factor. It required the decision-maker to ask the right question--would there be some harm to the setting of the listed building--and if the answer to that question was "yes"--to refuse planning permission unless that harm was outweighed by the advantages of the proposed development. When carrying out that balancing exercise the weight to be given to the harm to the setting of the listed building on the one hand and the advantages of the proposal on the other was entirely a matter of planning judgment for the decision-maker.

**14** Turning to the policy ground, he submitted that Lang J had erred by taking an over-rigid approach to PPS5 and the practice guide which were not intended to be prescriptive. Given the way in which those objecting to the proposed wind farm had put their case at the inquiry, the inspector had been entitled to focus on the extent to which the presence of the turbines in views to and from the listed buildings, including Lyveden New Bield, would affect the ability of the public to appreciate the heritage assets.

**15** In response to the reasons ground, he submitted that the question whether any significant view from the lodge or garden at Lyveden New Bield was planned or intended was a subsidiary, and not a "principal important controversial", issue. In any event, he submitted that on a natural reading of para 50 of the decision letter the inspector had simply found that the turbines would not intrude into such significant views, *if any*, as were obviously planned or intended, so it had been unnecessary for him to resolve the issue that he had left open in para 47 of the decision.

### **Discussion**

#### **Ground 1**

**16** What was Parliament's intention in imposing both the section 66 duty and the parallel duty under section 72(1) of the Listed Buildings Act to pay "special attention ... to the desirability of preserving or enhancing the character or appearance" of conservation areas? It is common ground that, despite the slight difference in wording, the nature of the duty is the same under both enactments. It is also common ground that "preserving" in both enactments means doing no harm: see *South Lakeland District Council v Secretary of State for the Environment* [1992] 2 AC 141,150, per Lord Bridge of Harwich.

[2015] 1 WLR 45 at 53

**17** Was it Parliament's intention that the decision-maker should consider very carefully whether a proposed development would harm the setting of the listed building (or the character or appearance of the conservation area), and if the conclusion was that there would be some harm, then consider whether that harm was outweighed by the advantages of the proposal, giving that harm such weight as the decision-maker thought appropriate; or was it Parliament's intention that when deciding whether the harm to the setting of the listed building was outweighed by the advantages of the proposal, the decision-maker should give particular weight to the desirability of avoiding such harm?

**18** Lang J analysed the authorities in paras 34-39 of her judgment. In chronological order they are: *The Bath Society v Secretary of State for the Environment* [1991] 1 WLR 1303; the *South Lakeland* case (see para 16 above); *Heatherington (UK) Ltd v Secretary of State for the Environment* (1994) 69 P & CR 374; and *Tesco Stores Ltd v Secretary of State for the Environment* [1995] 1 WLR 759. The *Bath Society* case and the *South Lakeland* case were concerned with (what is now) the duty under section 72. The *Heatherington* case is the only case in which the section 66 duty was considered. The *Tesco* case was not a section 66 or section 72 case, it was concerned with the duty to have regard to "other material considerations" under section 70(2) of the Town and Country Planning Act 1990 ("the Planning Act").

**19** When summarising his conclusions in the *Bath Society* case [1991] 1 WLR 1303, 1318 F-H about the proper approach which should be adopted to an application for planning permission in a conservation area, Glidewell LJ distinguished between the general duty under (what is now) section 70(2) of the Planning Act, and the duty under (what is now) section 72(1) of the Listed Buildings Act. Within a conservation area the decision-maker has two statutory duties to perform, but the requirement in section 72(1) to pay "special attention" should be the first consideration for the decision-maker. Glidewell LJ continued, at p 1319:

"Since, however, it is a consideration to which special attention is to be paid as a matter of statutory duty, it must be regarded as having considerable importance and weight ... As I have said, the conclusion that the development will neither enhance nor preserve will be a consideration of considerable importance and weight. This does not necessarily mean that the application for permission must be refused, but it does in my view mean that the development should only be permitted if the decision-maker concludes that it carries some advantage or benefit which outweighs the failure to satisfy the section [72(1)] test and such detriment as may inevitably follow from that."

**20** In the *South Lakeland* case [1992] 2 AC 141 the issue was whether the concept of "preserving" in what is now section 72(1) meant "positively preserving" or merely doing no harm. The House of Lords concluded that the latter interpretation was correct, but in his speech (with which the other members of the House agreed) Lord Bridge described the statutory intention in these terms, at p 146 E-G:

"There is no dispute that the intention of section [72(1)] is that planning decisions in respect of development proposed to be carried out

[2015] 1 WLR 45 at 54

in a conservation area must give a high priority to the objective of preserving or enhancing the character or appearance of the area. If any proposed development would conflict with that objective, there will be a strong presumption against the grant of planning permission, though, no doubt, in exceptional cases the presumption may be overridden in favour of development which is desirable on the ground of some other public interest. But if a development would not conflict with that objective, the special attention required to be paid to that objective will no longer stand in its way and the development will be permitted or refused in the application of ordinary planning criteria."

**21** In the *Heatherington* case 69 P & CR 374, the principal issue was the interrelationship between the duty imposed by section 66(1) and the newly imposed duty under section 54A of the Planning Act (since repealed and replaced by the duty under section 38(6) of the Planning and Compulsory Purchase Act 2004). However, Mr David Keene QC, at p 383, when referring to the section 66(1) duty, applied Glidewell LJ's dicta in the *Bath Society* case (see para 19 above), and said that the statutory objective "remains one to which considerable weight should be attached".

**22** Mr Nardell submitted, correctly, that the inspector's error in the *Bath Society* case [1991] 1 WLR 1303 was that he had failed to carry out the necessary balancing exercise. In the present case the inspector had expressly carried out the balancing exercise, and decided that the advantages of the proposed wind farm outweighed the less than substantial harm to the setting of the heritage assets. Mr Nardell submitted that there was nothing in Glidewell LJ's judgment which supported the proposition that the court could go behind the inspector's conclusion. I accept that (subject to grounds 2 and 3, see para 29 et seq below) the inspector's assessment of the degree of harm to the setting of the listed building was a matter for his planning judgment, but I do not accept that he was then free to give that harm such weight as he chose when carrying out the balancing exercise. In my view, Glidewell LJ's judgment is authority for the proposition that a finding of harm to the setting of a listed building is a consideration to which the decision-maker must give "considerable importance and weight."

**23** That conclusion is reinforced by the passage in the speech of Lord Bridge in the *South Lakeland* case [1992] 2 AC 141 to which I have referred: see para 20 above. It is true, as Mr Nardell submits, that the ratio of that decision is that "preserve" means "do no harm". However, Lord Bridge's explanation of the statutory purpose is highly persuasive, and his observation that there will be a "strong presumption" against granting permission for development that would harm the character or appearance of a conservation area is consistent with Glidewell LJ's conclusion in the *Bath Society* case. There is a "strong presumption" against granting planning permission for development which would harm the character or appearance of a conservation area precisely because the desirability of preserving the character or appearance of the area is a consideration of "considerable importance and weight."

**24** While I would accept Mr Nardell's submission that the *Heatherington* case 69 P & CR 374 does not take the matter any further, it does not cast any doubt on the proposition that emerges from the *Bath Society* case [1991] 1 WLR 1303 and the *South Lakeland* case [1992] 2 AC 141: that Parliament in enacting section 66(1) did intend that the desirability of preserving the settings of listed buildings should not simply be given careful consideration by the decision-maker for the purpose of deciding whether there would be some harm, but should be given "considerable importance and weight" when the decision-maker carries out the balancing exercise. [2015] 1 WLR 45 at 55

**25** In support of his submission that, provided he asked the right question--was the harm to the settings of the listed buildings outweighed by the advantages of the proposed development--the inspector was free to give what weight he chose to that harm, Mr Nardell relied on the statement in the speech of Lord Hoffmann in the *Tesco* case [1995] 1 WLR 759, 780 H that the weight to be given to a material consideration is entirely a matter for the local planning authority (or in this case, the inspector): "If there is one principle of planning law more firmly settled than any other, it is that matters of planning judgment are within the exclusive province of the local planning authority or the Secretary of State."

**26** As a general proposition, the principle is not in doubt, but the case was concerned with the application of section 70(2) of the Planning Act. It was not a case under section 66(1) or 72(1) of the Listed Buildings Act. The proposition that decision-makers may be required by either statute or planning policy to give particular weight to certain material considerations was not disputed by Mr Nardell. There are many examples of

planning policies, both national and local, which require decision-makers when exercising their planning judgment to give particular weight to certain material considerations. No such policies were in issue in the *Tesco* case, but an example can be seen in this case. In para 16 of his decision letter the inspector referred to planning policy statement 22: Renewable Energy (PPS22) which says that the wider environmental and economic benefits of all proposals for renewable energy, whatever their scale, are material considerations which should be given "significant weight". In this case, the requirement to give "considerable importance and weight" to the policy objective of preserving the setting of listed buildings has been imposed by Parliament. Section 70(3) of the Planning Act provides that section 70(1), which confers the power to grant planning permission, has effect subject to, inter alia, sections 66 and 72 of the Listed Buildings Act. Section 70(2) of the Planning Act, as substituted by section 143(2) of the Localism Act 2011, requires the decision-maker to have regard to "material considerations" when granting planning permission, but Parliament has made the power to grant permission having regard to material considerations expressly subject to the section 66(1) duty.

**27** Mr Nardell also referred us to the decisions of Ouseley J and this court in *R (Garner) v Elmbridge Borough Council* [2011] EWHC 86 (Admin); [2011] PTSR D25; [2011] EWCA Civ 891; [2012] PTSR D7, but the issue in that case was whether the local planning authority had been entitled to conclude that no harm would be caused to the setting of another heritage asset of the highest significance, Hampton Court Palace. Such was the weight given to the desirability of preserving the setting of the palace that it was common ground that it would not be acceptable to grant planning

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permission for a redevelopment scheme which would have harmed the setting of the palace on the basis that such harm would be outweighed by some other planning advantage [2011] EWCA Civ 891 at [14]. Far from assisting Mr Nardell's case, the *Garner* case is an example of the practical application of the advice in policy HE9.1: that substantial harm to designated heritage assets of the highest significance should not merely be exceptional, but "wholly exceptional".

**28** It does not follow that if the harm to such heritage assets is found to be less than substantial, the balancing exercise referred to in policies HE9.4 and HE10.1 should ignore the overarching statutory duty imposed by section 66(1), which properly understood (see the *Bath Society* case [1991] 1 WLR 1303, the *South Lakeland* case [1992] 2 AC 141 and the *Heatherington* case 69 P & CR 374) requires considerable weight to be given by decision-makers to the desirability of preserving the setting of all listed buildings, including Grade II listed buildings. That general duty applies with particular force if harm would be caused to the setting of a Grade I listed building, a designated heritage asset of the highest significance. If the harm to the setting of a Grade I listed building would be less than substantial that will plainly lessen the strength of the presumption against the grant of planning permission (so that a grant of permission would no longer have to be "wholly exceptional"), but it does not follow that the "strong presumption" against the grant of planning permission has been entirely removed.

**29** For these reasons, I agree with Lang J's conclusion that Parliament's intention in enacting section 66(1) was that decision-makers should give "considerable importance and weight" to the desirability of preserving the setting of listed buildings when carrying out the balancing exercise. I also agree with her conclusion that the inspector did not give considerable importance and weight to this factor when carrying out the balancing exercise in this decision. He appears to have treated the less than substantial harm to the setting of the listed buildings, including Lyveden New Bield, as a less than substantial objection to the grant of planning permission. The second defendant's skeleton argument effectively conceded as much in contending that the weight to be given to this factor was, subject only to irrationality, entirely a matter for the inspector's planning judgment. In his oral submissions Mr Nardell contended that the inspector had given considerable weight to this factor, but he was unable to point to any particular passage in the decision letter which supported this contention, and there is a marked contrast between the "significant weight" which the inspector expressly gave in para 85 of the decision letter to the renewable energy considerations in favour of the proposal having regard to the policy advice in PPS22, and the manner in which he approached the section 66(1) duty. It is true that the inspector set out the duty in para 17 of the decision letter, but at no stage in the decision letter did he expressly acknowledge the need, if he found that there would be harm to the setting of the

many listed buildings, to give considerable weight to the desirability of preserving the setting of those buildings. This is a fatal flaw in the decision even if grounds 2 and 3 are not made out.

[2015] 1 WLR 45 at 57

## Ground 2

**30** Grounds 2 and 3 are interlinked. The applicants contend that the inspector either misapplied the relevant policy guidance, or if he correctly applied it, failed to give adequate reasons for his conclusion that the harm to the setting of the listed buildings, including Lyveden New Bield, would in all cases be less than substantial. I begin with the policy challenge in ground 2. Lang J set out the policy guidance relating to setting in PPS5 and the practice guide in [2013] 2 P & CR 94, paras 62-64. The contribution made by the setting of Lyveden New Bield to its significance as a heritage asset was undoubtedly a "principal controversial" issue at the inquiry. In his proof of evidence on behalf of the local planning authority Mr Mills, its senior conservation officer, said, at para 4.5.1:

"To make an assessment of the indirect impact of development or change on an asset it is first necessary to make a judgment about the contribution made by its setting."

Having carried out a detailed assessment of that contribution he concluded, at para 4.5.17:

"In summary, what Tresham created at the site was a designed experience that was intimately linked to the surrounding landscape. The presence of the four prospect mounts along with the raised terrace provide a clear indication of the relationship of the site with the surrounding landscape."

Only then did he assess the impact of the proposed development on the setting by way of "a discussion as to the impact of the proposal on how the site is accessed and experienced by visitors".

**31** In its written representations to the inquiry English Heritage said of the significance and setting of Lyveden New Bield:

"The aesthetic value of the Lyveden heritage assets partly derives from the extraordinary symbolism and quality of the New Bield and the theatrical design of the park and garden. However, it also derives from their visual association with each other and with their setting. The New Bield is a striking presence when viewed on the skyline from a distance. The New Bield and Lyveden park and garden are wonderfully complemented by their undeveloped setting of woodland, pasture and arable land."

In para 8.23, English Heritage said:

"The New Bield and Lyveden park and garden were designed to be prominent and admired in their rural setting, isolated from competing structures. The character and setting of the Lyveden heritage assets makes a crucial contribution to their significance individually and as a group."

**32** In its written representations to the inquiry the National Trust said, at para 11, that each arm of the cruciform New Bield "was intended to offer extensive views in *all directions* over the surrounding parks and the Tresham estate beyond". The National Trust's evidence, at para 12, was that "one if not *the principal designed view from* within the lodge was from the

[2015] 1 WLR 45 at 58

withdrawing rooms which linked to the important Great Chamber and Great Hall on the upper two levels of the west arm of the lodge". The Trust contended that this vista survived today, and was directly aligned with the proposed wind farm site. (Emphasis in both paragraphs as in the original.)



**33** In his proof of evidence, the planning witness for the Stop Barnwell Manor Wind Farm Group said that:

"the views of Lyveden New Bield from the east, south-east and south, both as an individual structure and as a group with its adjoining historic garden and listed cottage, are views of a very high order. The proposed turbines, by virtue of their monumental scale, modern mechanical appearance, and motion of the blades, would be wholly alien in this scene and would draw the eye away from the New Bield, destroying its dominating presence in the landscape."

**34** This evidence was disputed by the second defendant's conservation witness, and the second defendant rightly contends that a section 288 appeal is not an opportunity to re-argue the planning merits. I have set out these extracts from the objectors' evidence at the inquiry because they demonstrate that the objectors were contending that the undeveloped setting of Lyveden New Bield made a crucial contribution to its significance as a heritage asset; that the New Bield (the lodge) had been designed to be a striking and dominant presence when viewed in its rural setting; and that the lodge had been designed so as to afford extensive views in all directions over that rural setting. Did the inspector resolve these issues in his decision, and if so, how?

**35** I endorse Lang J's conclusion that the inspector did not assess the contribution made by the setting of Lyveden New Bield, by virtue of its being undeveloped, to the significance of Lyveden New Bield as a heritage asset. The inspector did not grapple with (or if he did consider it, gave no reasons for rejecting) the objectors' case that the setting of Lyveden New Bield was of crucial importance to its significance as a heritage asset because Lyveden New Bield was designed to have a dominating presence in the surrounding rural landscape, and to afford extensive views in all directions over that landscape; and that these qualities would be seriously harmed by the visual impact of a modern man-made feature of significant scale in that setting.

**36** The inspector's reason for concluding in para 51 of the decision that the presence of the wind turbine array, while clearly having a detrimental effect on the setting of Lyveden New Bield, would not reach the level of substantial harm, was that it would not be so distracting that it would not prevent, or make unduly difficult, an understanding, appreciation or interpretation of the significance of the elements that make up Lyveden New Bield or Lyveden Old Bield or their relationship to each other.

**37** That is, at best, only a partial answer to the objectors' case. As the practice guide makes clear, the ability of the public to appreciate a heritage asset is one, but by no means the only, factor to be considered when assessing the contribution that setting makes to the significance of a heritage asset. The contribution that setting makes does not depend on there being an ability to access or experience the setting: see in particular paras 117 and 122 of the practice guide, cited in Lang J's judgment [2013] 2 P & CR 94, para 64.

*[2015] 1 WLR 45 at 59*

### **Ground 3**

**38** The inspector said that his conclusion in para 51 of the decision letter that the presence of the wind turbine array would not be so distracting that it would prevent or make unduly difficult, an understanding, appreciation or interpretation of the significance of the elements that make up Lyveden New Bield had been reached on the basis of his conclusions in para 50. In that paragraph, having said that the wind turbine array

"would be readily visible as a backdrop to the garden lodge in some directional views, from the garden lodge itself in views towards it, and from the prospect mounds, from within the ... orchard, and various other places around the site, at a separation distance of between one and two kilometres",

the inspector gave three reasons which formed the basis of his conclusion in para 51.

**39** Those three reasons were: (a) The turbines would not be so close, or fill the field of view to the extent, that they would dominate the outlook from the site. (b) The turbine array would not intrude on any obviously intended, planned view out of the garden or the garden lodge (which has windows all around its cruciform perimeter). (c) Any reasonable observer would know that the turbine array was a modern addition to the landscape, separate from the planned historic landscape, or building they were within, or considering, or interpreting.

**40** Taking those reasons in turn, reason (a) does not engage with the objectors' contention that the setting of Lyveden New Bield made a crucial contribution to its significance as a heritage asset because Lyveden New Bield was designed to be the dominant feature in the surrounding rural landscape. A finding that the "readily visible" turbine array would not dominate the outlook from the site puts the boot on the wrong foot. If this aspect of the objectors' case was not rejected (and there is no reasoned conclusion to that effect) the question was not whether the turbine array would dominate the outlook from Lyveden New Bield, but whether Lyveden New Bield would continue to be dominant within its rural setting.

**41** Mr Nardell's submission to this court was not that the inspector had found that there were no planned views (cf the submission recorded in para 70 of Lang J's judgment), but that the inspector had concluded that the turbine array would not intrude into obviously intended or planned views *if any*. That submission is difficult to understand given the inspector's conclusion that the turbine array would be "readily visible" from the garden lodge, from the prospect mounds, and from various other places around the site. Unless the inspector had concluded that there were *no* intended or planned views from the garden or the garden lodge, and he did not reach that conclusion (see para 47 of the decision letter), it is difficult to see how he could have reached the conclusion that the "readily visible" turbine array would not "intrude" on any obviously intended or planned views from the garden lodge. I am inclined to agree with Mr Nardell's alternative submission that the inspector's conclusion that while "readily visible" from the garden lodge, the turbine array would not "intrude" on any obviously intended or planned view from it, is best

[2015] 1 WLR 45 at 60

understood by reference to his third conclusion in para 50. While visible in views from the garden lodge the turbine array would not intrude upon, in the sense of doing substantial harm to, those views, for the reasons given in the last sentence of para 50.

**42** I confess that, notwithstanding Mr Nardell's assistance, I found some difficulty, not in understanding the final sentence of para 50--plainly any reasonable observer would know that the turbine array was a modern addition to the landscape and was separate from the planned historic landscape at Lyveden New Bield--but in understanding how it could rationally justify the conclusion that the detrimental effect of the turbine array on the setting of Lyveden New Bield would not reach the level of substantial harm. The inspector's application of the "reasonable observer" test was not confined to the effect of the turbine array on the setting of Lyveden New Bield. As Lang J pointed out in para 57 of her judgment, in other paragraphs of his decision letter the inspector emphasised one particular factor, namely the ability of members of the public to understand and distinguish between a modern wind turbine array and a heritage asset, as his reason for concluding either that the proposed wind turbines would have no impact on the settings of other heritage assets of national significance (paras 28-31); or a harmful impact that was "much less than substantial" on the setting of a Grade I listed church in a conservation area: para 36.

**43** Matters of planning judgment are, of course, for the inspector. No one would quarrel with his conclusion that "any reasonable observer" would understand the differing functions of a wind turbine and a church and a country house or a settlement (para 30); would not be confused about the origins or purpose of a settlement and a church and a wind turbine array (para 36); and would know that a wind turbine array was a modern addition to the landscape (para 50); but no matter how non-prescriptive the approach to the policy guidance in PPS5 and the practice guide, that guidance nowhere suggests that the question whether the

harm to the setting of a designated heritage asset is substantial can be answered simply by applying the "reasonable observer" test adopted by the inspector in this decision.

**44** If that test was to be the principal basis for deciding whether harm to the setting of a designated heritage asset was substantial, it is difficult to envisage any circumstances, other than those cases where the proposed turbine array would be in the immediate vicinity of the heritage asset, in which it could be said that any harm to the setting of a heritage asset would be substantial: the reasonable observer would always be able to understand the differing functions of the heritage asset and the turbine array, and would always know that the latter was a modern addition to the landscape. Indeed, applying the inspector's approach, the more obviously modern, large scale and functional the imposition on the landscape forming part of the setting of a heritage asset, the less harm there would be to that setting because the "reasonable observer" would be less likely to be confused about the origins and purpose of the new and the old. If the "reasonable observer" test was the decisive factor in the inspector's reasoning, as it appears to have been, he was not properly applying the policy approach set out in PPS5 and the practice guide. If it was not the decisive factor in the inspector's

*[2015] 1 WLR 45 at 61*

reasoning, then he did not give adequate reasons for his conclusion that the harm to the setting of Lyveden New Bield would not be substantial. Since his conclusion that the harm to the setting of the designated heritage assets would in all cases be less than substantial was fed into the balancing exercise in paras 85 and 86, the decision letter would have been fatally flawed on grounds 2 and 3 even if the inspector had given proper effect to the section 66(1) duty.

### **Conclusion**

**45** For the reasons set out above, which largely echo those given by Lang J in her judgment, I would dismiss this appeal.

### **RAFFERTY LJ**

**46** I agree.

### **MAURICE KAY LJ**

**47** I also agree.

*Appeal dismissed.*

Alison Sylvester, Barrister

1 Planning (Listed Buildings and Conservation Areas) Act 1990, s 66(1): see post, para 2.

2 Planning Policy Statement 5, policies HE9.1, HE9.4, HE10.1: see post, para 3.



Ms Madeline Homer  
Chief Executive  
Thanet District Council  
P.O. Box 9  
Cecil Street  
Margate  
CT9 1XZ

Your Ref  
  
Our Ref  
ADW/166055.0003  
  
Date  
16 January 2018

**By Email**  
**Urgent**

Dear Madam

**Extraordinary Council Meeting, 18 January 2018**

**This letter has been jointly prepared by BDB and RPS who are the legal and planning representatives acting on behalf of RiverOak Strategic Partners (RiverOak) in connection with their proposals to submit a Development Consent Order (DCO) application to reopen Manston Airport as an air-freight hub with some passenger services. It is written further to publication of the officer's report to the 18 January 2018 Extraordinary Council which will consider the Pre-Submission Publication Stage of the new Thanet Local Plan and should be read alongside the letter from RPS to the Head of Strategic Planning at Thanet District Council (TDC) dated 17th March 2017 in connection with the Proposed Revisions to the draft Thanet Local Plan (Preferred Options) (January 2017).**

Following our review of the officer's report to the 18th January 2018 Extraordinary Council, it has become necessary to bring several items to your attention. We address these matters below and present them under sub-headings that match those used in the officer's report.

Introduction and Background

The officer's report clearly sets out how important the Local Plan is as a key strategy document that supports the Council's Corporate Plan priorities by seeking to support economic growth and regeneration and seeking opportunities for inward investment and job creation. In its current state, RiverOak do not believe that the Local Plan goes far enough and it is not proactive enough in securing policies that encourage deliver of the corporate priorities – not least in respect of the significant opportunity presented by the possible reopening of Manston Airport site. The 2015 Consultation of the draft Thanet Local Plan rightly acknowledged that "a successful airport has the potential to be a significant catalyst for economic growth" and Policy SP05 supported "retention, development and

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50 Broadway London T +44 (0)20 7227 7000  
SW1H 0BL United Kingdom F +44 (0)20 7222 3480  
DX 2317 Victoria W www.bdb-law.co.uk

expansion of the airport and aviation operations" in full recognition of the opportunity that the airport presented to deliver strategic growth objectives. This policy approach to the airport was widely supported by the general public. To allocate the airport site for anything other than aviation use would be a missed opportunity for the District which should not be lost.

#### Government Guidance – Key Requirements

Paragraph 2.13 of the officer's report correctly recognises that the new Local Plan should be based on adequate, up-to-date and relevant evidence. RiverOak do not believe that Members of the Extraordinary Council have adequate evidence upon which to make such an important decision on the next stages of the Local Plan.

The officer's report itself identifies examples of where crucial pieces of evidence have not been completed and therefore made available to Members, or the general public. The evidence base to the Local Plan is lacking and incomplete and has not benefited from full scrutiny by way of a full consultation. Members have not seen the following evidence:

- **Avia response to the March 2017 representations** – Avia have already issued a preliminary response to RiverOak's comments from March 2017. However officers indicate that a fuller response, which relates directly to their September 2016 report, will be reported to Members in due course. No date is provided for this response. Additionally, the Avia Report itself has never been subject to scrutiny and comments have never been invited on it. As the principal evidence base for the Council's justification for no longer protecting the airport for aviation use, the Avia Report and any further commentary needs to be fully considered by Members and the subject of proper scrutiny before any definite decision is taken on the future of the airport.
- **Justification for the amount of employment land allocated** – The Council has promised to publish an Economic Development Needs Assessment-style document which will explain the amount of floorspace needed over the Plan period and the employment land supply situation. This is welcomed as the current document is very out of date (2010). The Council's employment strategy and policies are a central part of the Local Plan and in realising corporate priorities. They must be based on the latest information available especially as there are likely to be implications for other elements of the Local Plan if the currently reported land supply situation changes. It is understood that the promised document will be submitted to the Secretary of State alongside the Local Plan, but this will be after Members have made their decision at this week's meeting. RiverOak continue to raise significant concerns about the Council's continued approach and admittance to maintaining a significant oversupply of employment land especially when delivering employment land in Thanet has historically been difficult and failing to properly consider Employment Omission Sites, as doing this may present better options for addressing housing land supply needs thereby reducing the reliance on Manston Airport to meet this supply.
- **Strategic Housing Land Availability Assessment (SHLAA) and Strategic Housing Market Assessment (SHMA)** – the Council acknowledges that these documents are out of date. The SHMA has been revised to provide up to date evidence for the objectively assessed housing need for Thanet and the types and affordability of homes required but it has not been published. This should inform the level, size, type and affordability of housing to be provided for in the Pre-Submission draft Local Plan. The SHLAA will be updated for the Pre-Submission draft Local

Plan. The content of the Pre-Submission draft will be informed by the updated SHMA. Again, this is all crucial evidence which Members will not see before making a decision this week.

- **Housing Omission Sites (which have not be allocated)** – there were numerous objections from landowners and agents whose sites had not been allocated for housing. The Council is considering the sites individually and on their own merits in line with established assessment procedures set out in the evidence base. The Council has previously promised to publish an Environmental Report to update on this process and to explain why sites had not been allocated. This report has not been published. This evidence needs to be considered in full against the Council's proposed list of housing allocations and especially in light of the proposal to deliver a new settlement on Manston Airport (which was once the Council's least preferred housing solution) and which RiverOak state is not required with reference to the January 2018 RPS Report "*Thanet District Local Plan: Review of Future Housing and Employment Growth and Capacity for Development.*"
- **Final versions of the Infrastructure Delivery Plan, Sustainability Appraisal, Viability Assessment and Transport Modelling Work** – objections were received stating that these documents should have been published as part of the 2017 consultation. The Council has responded by saying it has published evidence base documents and information in the past, and is committed to continuing to do so, as and when evidence is available and at the appropriate stage. The Council recognises that these are important elements of evidence for the Examination. The officer's report states that it is the Council's intention to publish the evidence mentioned at the next stage, if available. This is simply not good enough when we are talking about such important evidence documents which underpin the District's future for the next 20 years.
- **Whole Plan Viability Study** – this document is required to ensure that the development identified in the draft Plan is deliverable in the Plan period to 2031. As this document has not yet been completed and therefore published, there is no certainty that the development being proposed (including the new settlement at Manston Airport) is viable and therefore deliverable. This evidence should be made available to Members now.

The above list is sizeable and contains a number of essential evidence documents that could all have significant implications for the Local Plan which the Council itself recognises as a key strategic document. Members have not been properly informed in advance of being asked to make decision on the next steps. This is not only unfair but irresponsible and could have severe repercussions at the Examination stage if an independent Inspector is not satisfied that adequate evidence has been supplied or that it is out-of-date.

#### Duty to Cooperate

We suggest that, despite the assurances given in the officer's report (paragraph 2.25), all the evidence suggests that there has not been sufficient co-operation with Dover District Council (DDC) on cross-boundary strategic priorities especially in relation to Manston Airport and that DDC is likely to make this point to the Local Plan Inspector at the appropriate time. A failure to demonstrate evidence of having effectively cooperated to plan for cross-boundary issues in accordance with paragraphs 178-181 of the

NPPF before submitting Local Plans for examination is a serious issue for the Inspector that could lead to the Local Plan not being accepted.

#### Housing Omission Sites

Paragraph 2.106 of the officer's report recognises that at the last consultation, the Council received a number of proposals for new housing sites that had not been allocated in the draft Local Plan. The Council alleges that the new sites have all been subject to assessment and in the same way as those sites that were submitted earlier on in the Local Plan process at the 'call for sites' stage. There has been no information published to date to evidence or justify the Council's decisions. Consequently, the Council's approach to meeting its housing land supply needs is not fully understood and even less so when considering that there needs to be a clear synergy and integration between the Local Plan housing and employment strategies (with reference to paragraph 158 of the NPPF) – where there is evidently none (see earlier section on Government Guidance – Key Requirements and comments made in relation to the Council's employment land supply assessment).

The overprovision of employment land allocations within the Local Plan (see paragraph's 2.131 to 2.135 of the officer's report) needs to be fully considered alongside the new SHLAA to establish if there is further opportunity for employment sites to be given over to housing (and therefore not having to allocate Manston Airport for a new settlement before the airport's future is properly considered). Additionally, there needs to be a proper consideration of the employment land omission sites (paragraph 2.136 and 2.137 of the officer's report) to see if they represent better examples for employment allocations therefore meaning that existing employment sites could be released for housing. Presumably if Manston Airport is retained in employment use, then other employment sites could be released for housing while maintaining the same amount of employment land.

#### Future of the Airport Site

There are a couple of points that we need to respond to in relation to paragraphs 2.107 to 2.130 of the officer's report. These are separated out under headings below:

##### *Selective and Inaccurate Reporting of the Planning Inspector's decision on Manston Airport (dated July 2017)*

The characterisation of the unsuccessful planning appeals relating to the Manston Airport site at paragraphs 2.119 to 2.122 of the officers' report is wholly misleading. The true picture is as follows:

The Council refused, or did not determine, four applications for changes of use of buildings on the site away from airport use. This was appealed by Stone Hill Park Limited. In December 2016, the Council decided that it would not defend the appeals, relying on the Avia Solutions report for its change of heart.

The Council attended, but did not participate at all in the appeals, which were heard in the Council Chamber in March 2017. The Avia Solutions' report was not introduced to evidence and was not therefore subject to any scrutiny and has as yet not been subject to scrutiny in any other way. In contrast, RiverOak's reports by Dr Sally Dixon and Mr Chris Cain were submitted in evidence and were able to be scrutinised, but were not challenged either by Stone Hill Park Limited nor the Council.



The Inspector decided on 13th July 2017 to dismiss the appeals because there was sufficient prospect of the airport site being brought back into airport use, and he concluded that existing national aviation policy framework and adopted Thanet Local Plan Policy EC4 carry 'significant weight', and that the emerging Policy SP05 carries 'little weight'.

*Justification to retain the airport designation*

It is wholly inappropriate and wrong for the Council to state in paragraph 2.117 that there is insufficient justification to retain the airport designation during the Plan period. The future of the airport has not yet been properly considered or tested through either the Local Plan or development consent processes and to base the new Local Plan on this conclusion would be wholly wrong. In paragraph 2.121 the Council fully recognises that the airport's future is a matter for the Local Plan and DCO process. It is simply too premature to conclude as the Council has on this matter – especially in light of the Planning Inspector's conclusions in July 2017 in connection with the planning appeals by Stone Hill Park Limited (see above).

Paragraph 2.38 says that the Environmental Report (yet to be published by the Council) will make the Council's assessment of the airport site much clearer. This document must be seen by Members and scrutinised before making such an important decision on the airport's future.

Paragraph 2.123 states that there are implications for the Local Plan if the airport site was not allocated for mixed-use development. RiverOak simply does not agree. The implications can be satisfactorily addressed through better consideration of the evidence base. We believe that there are equally implications for the Local Plan (and the Council's Economic Growth Strategy) by not safeguarding the airport for aviation use – this is not something that has been properly considered by the Council.

*Prematurity of deciding the airport's future now*

Paragraph 2.128 says that DCLG have said that there is no need for the draft Local Plan to be delayed by the DCO. Whilst this is true, it would also be significantly premature for the Council to assume that the DCO will not be successful and that an alternative use for the airport site must be promoted now. The airport should remain protected for aviation uses until such time that the Local Plan review and DCO processes have been completed – a fact that officers themselves acknowledge in the report (paragraph 2.120).

Weight to be given to the draft Local Plan

In paragraphs 2.150 to 2.152, the officer's report suggests that as the draft Local Plan progresses towards Examination, it gradually accrues more weight in development decisions and that when the Local Plan is submitted for Examination, that significant weight can be afforded to the draft policies. Until the Local Plan has been considered by an independent Planning Inspector, little weight can be given to the emerging plan policies and in particular Policy SP05 (Manston Airport) which continues to attract significant outstanding objection.

Consideration by the Overview and Scrutiny Panel

The officer's report also gives a misleading account of the proceedings of the Overview and Scrutiny Panel that took place on 21st November 2017 (paragraphs 1.10 and 2.168). In fact, a motion to

recommend that the Cabinet agree the Local Plan and that it recommend that the Council submit the Local Plan to the Planning Inspectorate for Examination was defeated by nine votes to one. This represents a strong message from elected Members about the concerns surrounding the new Local Plan and the outcome of the vote should be properly reported and accepted.

We have previously expressed concerns about the way that the comments from the Overview and Scrutiny Panel have been recorded. The concerns that they raised at the 21st November 2016 meeting a year earlier, namely the proposed loss of Manston Airport; the shortage of time that the Panel were given to study evidence documents; the lack of considering alternative uses for the airport site other than for housing; and whether the Council was going to look at rejected housing sites before finalising its housing strategy to deal with the need for additional homes, are all matters that are still of concern. The Panel's specific recommendation from that meeting to conduct further reviews in relation to the rejected housing sites to find extra land for housing development in order to minimise the use of greenfield sites still has not been actioned by the Council – over a year on.

### Conclusions

For the reasons set out in this letter, and in the RPS letter to the Head of Strategic Planning at the Council dated 17th March 2017 in connection with the Proposed Revisions to the draft Thanet Local Plan (Preferred Options) and contrary to the requirements of paragraph 182 of the NPPF:

- the draft Local Plan has not been positively prepared;
- it is not justified through adequate and up-to-date evidence;
- there is no evidence available to confirm that it will be effective and deliverable over the Plan period;
- there has not been effective joint working on cross-boundary strategic priorities;
- is not consistent with national planning and aviation policy objectives; and
- it has not been prepared in accordance with the Duty to Cooperate or legal and procedural requirements and therefore fails the 'soundness' test.

Consequently, the Plan should not be submitted for Examination.



BIRCHAM DYSON BELL

RiverOak maintain that there should be no new mixed-use settlement promoted at Manston and that there is a clear need, which needs to be captured in the new Local Plan, to safeguard land at Manston Airport exclusively for aviation related uses – consistent with the national policy context. The airport would deliver much-needed infrastructure which in turn would deliver economic growth on a local, regional and national level in addition to wider growth opportunities fully consistent with national planning policy objectives and the Council's own strategic priorities to grow economically.

Yours faithfully



**Bircham Dyson Bell LLP**

T +44 (0)20 7783 3441

F +44 (0)20 7222 3480

E [anguswalker@bdb-law.co.uk](mailto:anguswalker@bdb-law.co.uk)

cc All Members invited to the 18th January 2018 TDC Extraordinary Council Meeting  
Adrian Verrall, Strategic Planning Manager, TDC  
Iain Livingstone, Planning Applications Manager, TDC  
RiverOak Strategic Partners  
RPS

United Kingdom

**Tel:** +44 (0) 1273 546 800

**www:** [www.rpsgroup.com](http://www.rpsgroup.com)

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**From:** Andrew.Scott-Clark@kent.gov.uk [mailto:Andrew.Scott-Clark@kent.gov.uk]

**Sent:** 10 October 2017 17:39

**To:** Tara Barratt

**Cc:** Andrew Buroni; Catherine.Barrett@kent.gov.uk

**Subject:** [EXT] RE: Manston Airport Health Impact Assessment

Further to our telephone conversation last week, I'm now responding on the draft scope of the HIA you have sent me for comment.

As you are aware the population of Thanet is diverse with a range of health needs with some of the most deprived communities in Kent being resident in the district of Thanet. In fact of the 88 Lower Layer Super output areas which make up the population with the highest rates of all age all cause mortality or lowest life expectancy in Kent, some 24 of those are situated in Thanet. A number of these will directly affected by your proposals, particularly Newington and Central Harbour/Eastcliffe areas of Ramsgate. We know that these populations will be more adversely affected by issues such as noise and air pollution than the general population.

The local health economy is also struggling to deliver sustainable health care services and the organisations that are responsible for delivering these (both commissioning and providing) will need to be consulted. This includes Thanet Clinical Commissioning Group, East Kent Hospitals Foundation Trust, Kent Community Healthcare Foundation Trust, Kent and Medway Partnership Trust, Southeast Ambulance Trust, as clearly both the construction phase and the operation phase may have impact on local health services; services that are currently under significant financial and capacity pressure.

I hope this is useful at this stage. Please note that I'm on A/L from today until 20<sup>th</sup> October inclusive and am happy to discuss further on my return.

Your sincerely

**Andrew Scott-Clark** | Director of Public Health | Kent County Council | Room 1.61, Sessions House, County Hall, County Road, Maidstone, Kent, ME14 1XQ | Internal 7200 416659 | External: +443000416659 |  
| [www.kent.gov.uk](http://www.kent.gov.uk) |

**\*\*Please note my new KCC phone number**

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**From:** Tara Barratt [mailto:Tara.Barratt@rpsgroup.com]

**Sent:** 28 September 2017 17:27

**To:** Scott-Clark, Andrew - AH PH (Public Health)

**Cc:** Andrew Buroni; Barrett, Catherine - AH PH (Public Health)

**Subject:** RE: Manston Airport Health Impact Assessment

Hi Andrew,

Thanks for the quick response. Would you be around for a phone call early next week? We are working to a very tight schedule on this one.



Article

# Aircraft Noise and Psychological Ill-Health: The Results of a Cross-Sectional Study in France

Clémence Baudin <sup>1</sup> , Marie Lefèvre <sup>1</sup>, Patricia Champelovier <sup>2</sup>, Jacques Lambert <sup>2,3</sup>,  
Bernard Laumon <sup>4</sup> and Anne-Sophie Evrard <sup>1,\*</sup>

<sup>1</sup> Université Lyon, Université Claude Bernard Lyon1, IFSTTAR, UMRESTTE, UMR T\_9405, F-69675 Bron, France; clemence.baudin@ifsttar.fr (C.B.); marie.lefevre@ifsttar.fr (M.L.)

<sup>2</sup> IFSTTAR, Planning, Mobilities and Environment Department, Transport and Environment Laboratory, F-69675 Bron, France; patricia.champelovier@ifsttar.fr (P.C.); jamylambert@gmail.com (J.L.)

<sup>3</sup> Currently Retired, 69100 Villeurbanne, France

<sup>4</sup> IFSTTAR, Transport, Health and Safety Department, F-69675 Bron, France; bernard.laumon@ifsttar.fr

\* Correspondence: anne-sophie.evrard@ifsttar.fr; Tel.: +0033-4-72-14-24-63; Fax: +0033-4-72-37-68-37

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**Abstract:** *Background:* The effects of aircraft noise on psychological ill-health have not been largely investigated and remain to be discussed. No study has been performed in France on the health effects of aircraft noise. *Objectives:* The present study aimed to investigate the relationship between aircraft noise in dB and in terms of annoyance and psychological ill-health in populations living near airports in France. *Methods:* A total of 1244 individuals older than 18 and living near three French airports (Paris–Charles de Gaulle, Lyon–Saint-Exupéry and Toulouse–Blagnac) were randomly selected to participate in the study. Information about their personal medical history and socioeconomic and lifestyle factors was collected by means of a face-to-face questionnaire performed at their place of residence by an interviewer. Psychological ill-health was evaluated with the 12-item version of the General Health Questionnaire (GHQ-12). For each participant, outdoor aircraft noise exposure in dB was estimated by linking their home address to noise maps. Objective noise exposure in dB was considered to be the primary exposure of interest. Four noise indicators referring to three different periods of the day were derived and used for the statistical analyses:  $L_{den}$ ,  $L_{Aeq,24hr}$ ,  $L_{Aeq,6hr-22hr}$ , and  $L_{night}$ . Noise annoyance and noise sensitivity were the secondary risk factors of interest. Logistic regression models were used with adjustment for potential confounders. *Results:* The participation rate in the study was 30%. Approximately 22% of the participants were considered to have psychological ill-health according to the GHQ-12. No direct association was found between exposure to aircraft noise in dB and psychological ill-health. However, annoyance due to aircraft noise and noise sensitivity were both significantly associated with psychological ill-health. Moreover, a gradient was evidenced between annoyance and psychological ill-health, with increasing ORs from 1.79 (95% CI 1.06–3.03) for people who were not all annoyed to 4.00 (95% CI 1.67–9.55) for extremely annoyed people. *Conclusions:* These findings confirm the results of previous studies, suggesting there is no direct association between aircraft noise exposure in dB and psychological ill-health, but there is a significant relationship between noise sensitivity or annoyance due to aircraft noise and psychological ill-health. This supports the hypothesis that psychological aspects, such as noise annoyance and noise sensitivity, play important roles in the association between environmental noise and adverse effects on health. However, further studies are necessary in order to better understand the links between these variables.

**Keywords:** epidemiology; aircraft noise exposure; psychological ill-health

## 1. Introduction

Transportation noise continues to be a major source of environmental noise pollution and represents a major issue for public health [1]. According to the World Health Organization (WHO), at least one million healthy life years are lost every year due to traffic-related noise in Western Europe [2]. Sleep disturbance and annoyance due to noise are the most serious consequences of environmental noise, mostly related to road traffic [2]. Aircraft noise is the third most important source, after road traffic and railway noise, affecting human exposure above the levels considered to be annoying or to have adverse effects on health [3]. Aircraft noise is perceived as a major environmental stressor near airports. The impact of long-term exposure to aircraft noise on health is of growing concern [4] due to the steady rise in flights as well as the increasing dissatisfaction by nearby inhabitants with this noise [5].

Many studies have demonstrated the adverse effects of exposure to aircraft noise on health, such as annoyance [5,6], sleep disturbance [7,8], cardiovascular diseases including hypertension [9–13], and alteration of cognitive performances among children [14,15]. The association between noise exposure and noise annoyance has been extensively investigated, and aircraft noise has been found to be the most annoying noise source among all transportation noise sources when standardized for noise exposure level [6]. Recently, it has been suggested that annoyance due to aircraft noise has increased in previous years [5,16,17].

In addition, some studies support the hypothesis that psychological aspects such as noise annoyance and noise sensitivity play important roles in the association between environmental noise and adverse effects on health [18–20]. Noise is a psychosocial stressor that activates the sympathetic and endocrine systems [21]. As some studies have shown that endocrine distress can lead to psychological symptoms such as depression or anxiety [22,23], the question has been raised as to whether aircraft noise exposure, in dB or in terms of noise sensitivity or noise annoyance, is related to psychological ill-health [24]; however, this has not been largely investigated, and remains to be discussed.

The General Health Questionnaire (GHQ) has been extensively used in large-scale studies for the evaluation of psychological ill-health in the community setting [25]. The four studies investigating the effects of aircraft noise exposure in dB on mental health showed consistent results—they did not find any significant association between aircraft noise exposure and psychological ill-health based on the GHQ-30 [26], the GHQ-28 [27], or the GHQ-12 [28]. Only Miyakawa et al. in Japan showed a significant correlation between aircraft noise exposure and moderate/severe somatic symptoms identified by the GHQ-28 in people sensitive to noise [27]. However, all of these authors observed significant associations between psychiatric illness and noise annoyance [26,28] or noise sensitivity [26,29]. Furthermore, consistent results have been shown regarding the effects of aircraft noise on psychological symptoms, such as depression and anxiety [30], but not for clinically defined psychiatric disorders. Therefore, the effects of aircraft noise on psychological ill-health remain unclear and are still under discussion. Moreover, these effects have never been studied in France and have been investigated by only very few studies in Europe. The study by Tarnopolsky et al. was published in 1980 [26], but aircraft noise levels have changed since the 1980s.

The objective of the DEBATS research program (Discussion on the health effects of aircraft noise) is to investigate the effects of long-term aircraft noise exposure on health among populations living near airports in France. A previous result from the DEBATS study provided support that psychological stress is induced by aircraft noise exposure, resulting in hypothalamus-pituitary-adrenal axis dysregulation and a flattened cortisol rhythm, and notably, a lower ability to decrease cortisol levels at night [31]. The present paper addresses, more specifically, the issue of psychological ill-health among populations living near airports in France, and its association with aircraft noise exposure, annoyance due to aircraft noise and noise sensitivity. The question of whether exposure to high levels of aircraft noise is associated with a higher risk of psychological ill-health is raised.

## 2. Methods

### 2.1. Study Population

The present study included people older than 18 years of age at the time of the interview, living in the study area near one of the following three French international airports: Paris–Charles de Gaulle, Lyon Saint–Exupéry, or Toulouse–Blagnac [11]. The study area was defined based on noise contours produced for France’s largest airports, representing four categories of aircraft noise exposure in terms of  $L_{den}$ : <50, 50–54, 55–59, and  $\geq 60$  dB. The  $L_{den}$  is an annual noise indicator which describes the average equivalent sound pressure levels over a complete year for day (6 a.m. to 6 p.m.), evening (6 p.m. to 10 p.m.), and night (10 p.m. to 6 a.m.) where evening and night sound pressure levels receive a 5 dB and a 10 dB penalty, respectively. The  $L_{den}$  is the “general purpose” indicator defined in the EU directive 2002/49 relating to the assessment and management of environmental noise.

Households were randomly selected from a phone directory, based on their address in the study area. Once a household was contacted by phone, a respondent was then randomly selected from within the household. The participant signed and returned an informed consent form by mail. Almost 40% of those contacted who refused to participate responded to a short questionnaire about their demographic and socioeconomic characteristics. It was also possible to compare the characteristics of the participants to those of people who refused to participate (non-participants), as well as to those of the study population, using data from the French national census.

In total, 1244 participants (549 men and 695 women) were included in the study and responded to a questionnaire during a face-to-face interview at their place of residence in 2013. This questionnaire collected demographic and socioeconomic information; lifestyle factors including smoking, alcohol consumption, and physical activity; personal medical history in terms of sleep disturbances, cardiovascular diseases, anxiety, depressive disorders, medication use; and annoyance due to noise exposure. Blood pressure and anthropometric measurements (weight, height, and waist circumference) were also recorded, and saliva samples were taken to determine cortisol levels. The analyses presented in the present paper were carried out on the 1222 participants (688 women and 534 men) who had complete information for all the covariates included in the models.

### 2.2. Exposure Assessment

Noise contours are routinely produced by Paris Airports, and the French Civil Aviation Authority for Toulouse–Blagnac and Lyon Saint–Exupéry airports, with the “Integrated Noise Model” (INM) using a height of 4 m for noise simulations [32]. The INM is an internationally well-established computer model that evaluates aircraft noise impacts near airports and outputs noise contours for an area. Outdoor aircraft noise exposure was assessed in 1 dB intervals for each participant with a linkage between the noise contours and their home address using a geographic information system (GIS) technique. Four noise indicators referring to three different periods of the day were derived and used for the statistical analyses:  $L_{den}$ ,  $L_{Aeq,24hr}$ ,  $L_{Aeq,6hr-22hr}$ , and  $L_{night}$ . The  $L_{den}$  was used to select the participants (Table 1). The  $L_{Aeq,24hr}$ ,  $L_{Aeq,6hr-22hr}$ , and  $L_{night}$  correspond to the average of sound levels during the corresponding periods of time.

**Table 1.** Comparison of the demographic and socioeconomic characteristics of participants, non-participants, and the study population.

	Participants		Non-Participants <sup>1</sup>		Study Population <sup>2</sup>
	<i>n</i>	%	<i>n</i>	%	%
<b>Noise level (<math>L_{den}</math> in dB)</b>					
<b>Paris-Charles de Gaulle</b>					
<50	108	17%	324	22%	-
50–54	102	16%	215	14%	-
55–59	208	34%	464	31%	-
$\geq 60$	202	33%	497	33%	-

Table 1. Cont.

	Participants		Non-Participants <sup>1</sup>		Study Population <sup>2</sup>
	<i>n</i>	%	<i>n</i>	%	%
<b>Toulouse-Blagnac</b>					
<50	104	25%	198	29%	-
50–54	103	25%	159	23%	-
55–59	101	25%	160	23%	-
≥60	103	25%	169	25%	-
<b>Lyon Saint-Exupery</b>					
<50	105	49%	166	57%	-
50–54	102	48%	124	43%	-
55–59	5	2%	1	0%	-
≥60	1	1%	0	0%	-
<b>Gender</b>					
Men	549	44%	1028	41%	48%
Women	695	56%	1449	59%	52%
<b>Age</b>					
18–34	226	18%	497	20%	26%
35–44	236	19%	435	18%	17%
45–54	266	21%	416	17%	19%
55–64	260	21%	448	18%	15%
65–74	185	15%	332	13%	13%
≥75	71	6%	331	13%	10%
<b>Marital status</b>					
Single	253	20%	555	22%	-
Married	782	63%	1326	54%	-
Widowed	76	6%	281	11%	-
Divorced	133	11%	194	8%	-
Other	0	0%	10	0%	-
Unknown/refusal	0	0%	111	5%	-
<b>Socio-occupational category</b>					
Farming, trade	32	2%	81	3%	5%
Executive, superior	227	18%	322	13%	9%
Intellectual occupation	220	18%	103	4%	14%
Intermediate	268	22%	749	30%	17%
Office worker	79	6%	145	6%	13%
Manual worker	337	27%	929	38%	25%
Retiree	81	7%	134	5%	17%
Never worked or long-term unemployed (students, housewives, other)	0	0%	14	1%	-
Unknown/refusal					

<sup>1</sup> People randomly selected and contacted by phone, but who refused to participate. These people responded to a short questionnaire about their demographic and socioeconomic characteristics. <sup>2</sup> The distribution of the study population is based on data from the 1999 INSEE census, adjusted in 2007, for individuals aged 18 and over and living in one of the 161 municipalities of the study area.

### 2.3. Psychological Illness

The presence of psychological illness was determined with the 12-item version of the GHQ [33]. The GHQ-12 is a self-reporting instrument for the detection of mental disorders within a community, such as temporary alterations of normal psychological functioning, stable disorders, and stress-related alterations of adaptive behavior. Each of the 12 questions has a four-point response scale, usually scored in a bimodal fashion (respectively 0, 0, 1, 1): ‘not at all’, ‘no more than usual’, ‘rather more than usual’, and ‘much more than usual’. A total score between 0 and 12 was then calculated by summing up the scores of the individual items—the higher the GHQ-12 score, the more psychological distress reported. This total score was then dichotomized in order to determine the presence of psychological ill-health. According to prior studies [34–36] and to Goldberg’s recommendations [33,37,38], participants with a total score  $\geq 3$  were considered to have psychological ill-health.



#### 2.4. Confounding Factors

The following potential confounders were obtained from the questionnaire with valid and reliable questions used in previous other studies [28,39,40], and introduced into multivariate regression models: gender (dichotomous), age (six categories: 18–34; 35–44; 45–54; 55–64; 65–75; >75 years old), country of birth (two categories: France-born/foreign-born), occupational activity (dichotomous: no/yes), education (three categories: <French high school certificate/French high school certificate/>French high school certificate), marital status (four categories: single/married/widowed/divorced), smoking habits (four categories: non/ex/occasional/daily smoker), alcohol consumption (four categories: no/light/moderate/heavy drinker), number of work-related stress and major stressful life events (three categories: 0/1/more than 2), household monthly income (three categories: <2300; 2300–4000; ≥4000 euros), sleep duration (five categories: ≤5 h; 6 h; 7 h; 8 h; ≥9 h), antidepressant use (two categories: no/yes), and self-reported anxiety (two categories: extremely/a lot versus moderately/slightly/not at all).

Other a priori confounders, such as house characteristics (window opening, insulation of roof and/or windows) or personal medical history (cardiovascular or other physical diseases) were also initially considered. However, as they were not associated with psychological ill-health in the univariate analysis ( $p > 0.20$ ), they were not included in the multivariate analysis.

Noise sensitivity and annoyance due to aircraft noise were the secondary risk factors of interest. Noise sensitivity was assessed using the following question: “Regarding noise in general, compared to people around you, do you think that you are: less sensitive than, or as sensitive as, or more sensitive than people around you?” Aircraft noise annoyance was assessed by a standardized question with a verbal five-point answer scale as recommended by the International Commission on the Biological Effects of Noise (Icben): “Thinking about the last 12 months when you are at home, how much does aircraft noise bother, disturb or annoy you?” There were five possible answers: extremely, very, moderately, slightly or not at all.

#### 2.5. Statistical Analysis

Associations between psychological ill-health and aircraft noise in terms of dB, noise sensitivity or noise annoyance were assessed with logistic regression models. The M0 model included only aircraft noise exposure in dB as an explanatory variable. The M1 model included aircraft noise exposure in dB as the primary exposure of interest, together with major potential confounders as covariates. The M2 model included aircraft noise exposure in dB as the primary exposure of interest, as well as noise sensitivity and noise annoyance as the secondary risk factors of interest, together with confounders. Interactions between noise sensitivity and aircraft noise exposure, annoyance and aircraft noise exposure, and annoyance and noise sensitivity were analyzed in the M2 model.

The linearity of the relationship between the dependent variable and aircraft noise exposure was tested using generalized additive models, including a smooth cubic function with linear and quadratic terms for aircraft noise exposure [41]. As the quadratic term was not significant in these models, associations with the continuous exposure variable were finally estimated per 10 dB increase and are presented in this paper.

All the statistical analyses were performed with SAS 9.3 (SAS Software [program] 9.3 version. USA: Cary, NC, USA, 2011).

#### 2.6. Ethics Approval

Two national authorities in France, the French Advisory Committee for Data Processing in Health Research and the French National Commission for Data Protection and the Liberties approved the present study.

### 3. Results

Overall, the participation rate was 30% (1244 participants/4202 eligible people). Participation rates differed among populations situated near the three airports: 25% for Paris–Charles de Gaulle airport, 34% for Toulouse–Blagnac airport, and 39% for Lyon–Saint-Exupéry airport. In contrast, similar numbers of participants from the four 5 dB-categories of aircraft noise exposure were included. The demographic and socioeconomic characteristics were quite similar among participants, people who refused to participate but responded to the short questionnaire (non-participants), and the study population (Table 1); the participants were a little older and were more likely to have executive or superior intellectual occupations.

The prevalence of psychological ill-health based on the GHQ-12 was 22% (17% in men and 25% in women). Table 2 shows the odds ratios (ORs) and their 95% CIs for psychological ill-health in relation to levels of aircraft noise in dB and the confounders used in the univariate analysis. The percentage of participants with psychological ill-health did not differ across the four categories of aircraft noise exposure. Women (compared to men), 45 to 54-year-old participants (compared to 18–34-year-old participants), foreign-born participants (compared to France-born participants), daily smokers (compared to non-smokers), people who reported two stressful life events or more (compared to people with no event), people with a household monthly income lower than 2300 euros (compared to people with a household monthly income higher than 4000 euros), and participants who reported anxiety had a higher risk of psychological ill-health according to the GHQ-12. Noise sensitivity and annoyance due to aircraft noise were also significantly associated with psychological ill-health—people who described themselves as more sensitive to noise than others and people who were moderately, very, or extremely annoyed by aircraft noise had a higher risk of psychological distress, as evaluated with the GHQ-12.

**Table 2.** Odds ratios (ORs) for psychological ill-health in relation to major confounders in univariate logistic models.

	N	Number of Participants with GHQ-12 $\geq$ 3	Number of Participants with GHQ-12 < 3	OR	(95% CI)
<b>Noise levels (<math>L_{den}</math> in dB)</b>					
<45	82	25 (30%)	57 (70%)	1	-
45–49	235	49 (21%)	186 (79%)	0.60	(0.34–1.06)
50–54	307	62 (20%)	245 (80%)	0.58	(0.33–1.00)
55–59	314	66 (21%)	248 (79%)	0.61	(0.35–1.04)
$\geq$ 60	306	66 (22%)	240 (78%)	0.63	(0.36–1.08)
<b>Noise sensitivity</b>					
As sensitive or less sensitive than people around you	866	154 (18%)	712 (82%)	1	-
More sensitive than people around you	369	111 (30%)	258 (70%)	<b>1.99</b>	<b>(1.50–2.64)</b>
<b>Annoyance due to aircraft noise</b>					
Not at all annoyed	246	37 (15%)	209 (85%)	1	-
Slightly	312	65 (21%)	247 (79%)	1.49	(0.95–2.32)
Moderately	460	99 (22%)	361 (78%)	<b>1.55</b>	<b>(1.02–2.34)</b>
Very	186	50 (27%)	136 (73%)	<b>2.08</b>	<b>(1.29–3.35)</b>
Extremely	40	17 (43%)	23 (57%)	<b>4.18</b>	<b>(2.04–8.56)</b>
<b>Gender</b>					
Men	549	92 (17%)	457 (83%)	1	-
Women	695	176 (25%)	519 (75%)	<b>1.68</b>	<b>(1.27–2.23)</b>
<b>Age</b>					
18–34	226	43 (19%)	183 (81%)	1	-
35–44	236	58 (25%)	178 (75%)	1.39	(0.89–2.16)
45–54	266	71 (27%)	195 (73%)	<b>1.55</b>	<b>(1.01–2.38)</b>
55–64	260	56 (22%)	204 (78%)	1.17	(0.75–1.82)
65–74	185	26 (14%)	159 (86%)	0.70	(0.41–1.18)
$\geq$ 75	71	14 (20%)	57 (80%)	1.05	(0.53–2.05)

Table 2. Cont.

	N	Number of Participants with GHQ-12 $\geq$ 3	Number of Participants with GHQ-12 < 3	OR	(95% CI)
<b>Country of birth</b>					
France-born	1054	215 (20%)	839 (80%)	1	-
Foreign-born	190	53 (28%)	137 (72%)	<b>1.51</b>	<b>(1.06–2.14)</b>
<b>Occupational activity</b>					
No	499	100 (20%)	399 (80%)	1	-
Yes	745	168 (23%)	577 (77%)	1.16	(0.88–1.53)
<b>Education</b>					
<French high-school certificate	452	97 (21%)	355 (79%)	1	-
French high-school certificate	215	52 (24%)	163 (76%)	1.17	(0.79–1.72)
>French high-school certificate	577	119 (21%)	458 (79%)	0.95	(0.70–1.29)
<b>Marital status</b>					
Single	253	56 (22%)	197 (78%)	1	-
Married	782	162 (21%)	620 (79%)	0.92	(0.65–1.3)
Divorced	133	34 (26%)	99 (74%)	1.21	(0.74–1.97)
Widowed	76	16 (21%)	60 (79%)	0.94	(0.50–1.75)
<b>Smoking habits</b>					
Non-smoker	625	120 (19%)	505 (81%)	1	-
Ex-smoker	330	74 (22%)	256 (78%)	1.22	(0.88–1.69)
Occasional smoker	19	1 (5%)	18 (95%)	0.23	(0.03–1.77)
Daily smoker	269	72 (27%)	197 (73%)	<b>1.54</b>	<b>(1.10–2.15)</b>
<b>Alcohol consumption</b>					
No	348	89 (26%)	259 (74%)	1	-
Light	637	134 (21%)	503 (79%)	0.78	(0.57–1.05)
Moderate	193	31 (16%)	162 (84%)	<b>0.56</b>	<b>(0.35–0.88)</b>
Heavy	54	10 (19%)	44 (81%)	0.66	(0.32–1.37)
<b>Number of work-related stress and major stressful life events</b>					
0	287	46 (16%)	241 (84%)	1	-
1	330	57 (17%)	273 (83%)	1.09	(0.71–1.67)
$\geq$ 2	627	165 (26%)	462 (74%)	<b>1.87</b>	<b>(1.30–2.69)</b>
<b>Household monthly income</b>					
$\geq$ 4000 euros (4500 US\$)	319	56 (18%)	263 (82%)	1	-
2300–4000 euros (2600–4500 US\$)	474	93 (20%)	381 (80%)	1.15	(0.79–1.65)
<2300 euros (2600 US\$)	451	119 (26%)	332 (74%)	<b>1.68</b>	<b>(1.18–2.40)</b>
<b>Sleep duration</b>					
$\leq$ 5 h	52	9 (17%)	43 (83%)	0.65	(0.31–1.40)
6 h	256	30 (19%)	126 (81%)	0.74	(0.47–1.18)
7 h	363	88 (24%)	275 (76%)	1	-
8 h	424	94 (22%)	330 (78%)	0.89	(0.64–1.24)
$\geq$ 9 h	249	47 (19%)	202 (81%)	0.73	(0.49–1.08)
<b>Antidepressant use</b>					
No	1203	255 (21%)	948 (79%)	1	-
Yes	41	13 (32%)	28 (68%)	1.73	(0.88–3.38)
<b>Self-reported anxiety</b>					
Moderately/slightly/not at all	978	122 (12%)	856 (88%)	1	-
Extremely/a lot	266	146 (55%)	120 (45%)	<b>8.54</b>	<b>(6.28–11.61)</b>

The ORs and their 95% CIs evaluated with the GHQ-12 for psychological ill-health in relation to aircraft noise exposure in three different models (M0, M1 and M2) are presented in Table 3. These analyses involved 1222 participants (688 women and 534 men). They were performed separately for the four

noise indicators ( $L_{den}$ ,  $L_{Aeq,24hr}$ ,  $L_{Aeq,6hr-22hr}$  and  $L_{night}$ ), but as the results were similar between all noise indicators, they are shown for  $L_{den}$  only. No relationship was observed between aircraft noise exposure in dB and psychological distress, regardless of the noise indicator and the inclusion of confounding factors in the models (M0 and M1 models). When noise sensitivity and annoyance due to aircraft noise were both included in the model (M2 model), there was still no association between psychological ill-health and aircraft noise exposure in dB, regardless of the noise indicator. In contrast, relationships were shown between annoyance due to aircraft noise and psychological ill-health, and between noise sensitivity, and psychological ill-health. Moreover, a gradient was observed between annoyance due to aircraft noise and psychological ill-health; ORs ranged from 1.79 (95% CI 1.06–3.03) for people who were not all annoyed to 4.00 (95% CI 1.67–9.55) for extremely annoyed people.

**Table 3.** Odds ratios (ORs) for the relationship between aircraft noise exposure and psychological ill-health.

	OR	(95%CI)
<b>M0 Model</b>		
$L_{den}$ <sup>1</sup>	0.91	(0.72–1.14)
<b>M1 Model</b>		
$L_{den}$ <sup>1</sup>	1.02	(0.78–1.34)
<b>M2 Model</b>		
$L_{den}$ <sup>1</sup>	0.93	(0.69–1.24)
<b>Noise sensitivity</b>		
Less or as sensitive as people around you	1.00	
More sensitive th. people around you	<b>1.52</b>	<b>(1.09–2.14)</b>
<b>Annoyance due to aircraft noise</b>		
Not at all annoyed	1.00	
Slightly	<b>1.79</b>	<b>(1.06–3.03)</b>
Moderately	1.63	(0.98–2.71)
Very	<b>2.00</b>	<b>(1.10–3.64)</b>
Extremely	<b>4.00</b>	<b>(1.67–9.55)</b>

<sup>1</sup> Per 10 dB increase. M0 = Univariate regression model including only aircraft noise exposure in terms of  $L_{den}$ . M1 = Multivariate regression model including aircraft noise exposure in terms of  $L_{den}$  together with the major potential confounders listed in Table 2 (without noise sensitivity and annoyance due to aircraft noise). M2 = Multivariate regression model including aircraft noise exposure in terms of  $L_{den}$  together with noise sensitivity, annoyance due to aircraft noise and the major potential confounders listed in Table 2. Bold values are statistically significant ( $p < 0.05$ ).

Finally, no significant interactions were observed between the noise indicators, noise sensitivity or annoyance due to aircraft noise.

#### 4. Discussion

The DEBATS study is the first in France and one of only very few in Europe to investigate the relationship between long-term aircraft noise exposure and psychological ill-health in populations living near airports. The participation rate (30%) was similar to aircraft noise studies completed in Germany, Italy, and in the UK [12]. The prevalence of psychological ill-health evaluated by the GHQ-12 was 22% (17% among men and 25% among women). In contrast, in a Spanish study by Rocha et al., the prevalence of common mental disorders assessed with the GHQ-12 was 30% in women and 17% in men [34]. Further, in a study around Schiphol airport in Amsterdam, carried out in 2005 by van Kamp et al., the prevalence of self-reported mental health complaints evaluated with the GHQ-12 was 26% [28].

The results of the present study confirm those found in the literature, namely that there was no significant association between aircraft noise exposure in dB and psychological ill-health identified with the GHQ-12. However, our findings suggested a gradient between annoyance due to aircraft noise and psychological ill-health, with increasing ORs from 1.79 (95% CI 1.06–3.03) for people who were not all annoyed to 4.00 (95% CI 1.67–9.55) for extremely annoyed people. Miedema and

Oudshoorn [6] showed evidence for a dose–response relationship between aircraft noise exposure and the percentage of highly annoyed people. These exposure–response relationships are used as the standard curves for the assessment and management of environmental noise in the European Union [42]. Therefore, it could be assumed that an increase in aircraft noise exposure leads to an increase in annoyance due to aircraft noise, thus leading to an increase in psychological ill-health. However, further research is necessary to validate this hypothesis.

One of the first studies to assess the effects of aircraft noise on mental health was performed by Tarnopolsky et al. in 1980 [26]. Although the authors did not observe any excess psychiatric morbidity identified by the GHQ-30 in populations exposed to aircraft noise, they showed an association between psychiatric illness and noise annoyance or sensitivity to noise. In the longitudinal study around Schiphol airport in Amsterdam [28], which is the most similar to the DEBATS in terms of methodology, the authors did not observe any association between noise exposure levels or changes in exposure levels after the opening of the fifth runway and mental health complaints as measured by the GHQ-12 (OR = 0.94 for a 3 dB-increase in noise levels in terms of  $L_{den}$ , 95% CI = 0.84–1.05). However, people who were severely annoyed by aircraft noise reported more mental health complaints, as assessed by the GHQ-12 (OR = 1.84, 95% CI = 1.38–2.45). In Japan, Miyakawa et al. [27] did not observe any relationship between aircraft noise exposure and psychiatric disorders evaluated with the GHQ-28 but showed a significant correlation between aircraft noise exposure and moderate/severe somatic symptoms in people sensitive to noise. In Spain, outside noise reported as a perceived environmental problem was significantly associated with the prevalence of common mental disorders using the GHQ-12 [34]. Finally, in the United Kingdom, high noise sensitivity was identified by Stansfeld et al. [29] as a predictor of psychological distress using the GHQ-30.

In the present study, a relationship was observed between noise sensitivity and psychological ill-health, and between annoyance due to aircraft noise and psychological ill-health, irrespective of noise exposure. Both relationships were significant, underlining the independent effects of both factors and supporting the hypothesis that psychological aspects such as noise annoyance and noise sensitivity seem to play important roles in the association between environmental noise and adverse effects on health.

On one hand, it has been postulated that, if a (direct) relationship does not exist between noise exposure in dB and psychological ill-health, annoyance may be regarded as an intermediate step in the causal chain between aircraft noise exposure and health, in particular, psychological ill-health. However, the relationship between noise annoyance and psychological ill-health is still under discussion. Because of the cross-sectional design of major studies, the direction of the association has been questioned. Extremely annoyed people might be more at risk of having psychological ill-health, but it is also possible that people with psychological ill-health might be more at risk of being annoyed and then be more willing to attribute their symptoms to noise [19,20,43]. However, it was not possible to answer this question in the present study.

On the other hand, noise sensitivity is considered as a moderating factor of the effects of aircraft noise exposure on noise annoyance [18,44]. It has been suggested that noise sensitivity could also influence the effects of noise on physical and psychological ill-health [45]. Noise sensitivity has been suggested to be a potential indicator of vulnerability to environmental stressors, not only to environmental noise [46,47], it has also been postulated to be a proxy measure of anxiety [29]. However, further research is necessary to better understand how noise sensitivity and psychological ill-health are linked.

A specific strength of the present study relates to the evaluation of noise exposure. Outdoor aircraft noise exposure was estimated for each participant with modeled noise levels produced by the French Civil Aviation Authority using INM software. Most of the differences between these modeled noise levels and measurements from permanent stations [48] or from specific campaigns [49] were between 0.5 and 1.5 dB in terms of  $L_{den}$ , showing the close correspondence between modeled and measured noise levels.

In terms of limitations, aircraft noise exposure was estimated in front of each participant's residence. Nevertheless, this estimation did not take into account the building outdoor insulation and the

opening/closing practice of the windows, thus leading to a potential misclassification of the participants according to their noise levels. Moreover, many of the participants, at least those who were at work, were more likely to be away from their homes during the day. No information was available about the daytime aircraft noise exposure of the participants when they were away from their homes, for example, at their workplace. Thus, misclassification of exposure could have occurred, especially regarding daytime exposure. However, it is unlikely that the exposure classification would depend on the psychological distress of the participants. Therefore, such non-differential misclassification would have induced an appreciable downward bias if there is a true association between aircraft noise exposure and psychological ill-health, thus explaining the absence of an association observed in the present study.

Furthermore, a selection bias cannot be excluded in the present study. Participants were slightly different from people who refused to participate but responded to the short questionnaire, particularly in regards to their age and their socio-occupational category. In addition, these non-participants were not representative of all people who refused to participate. The representativeness of a sample randomly selected from a phone directory (certainly with a better socioeconomic situation than that of the study population) could be raised but could not be quantified in the present study. The same applies for the representativeness of the study population as compared with all people living near an airport in France. However, due to insufficient information, it was not possible to characterize this latter population.

Another form of selection bias may have occurred during the estimation of the prevalence of psychological ill-health. This prevalence may have been underestimated in the higher noise zones if unsusceptible individuals were selected in these zones. The possible adverse effects of aircraft noise on psychological ill-health could have led to a lower proportion of sensitive people among those living near airports, particularly in the higher noise zones. People prone to illness, especially to psychological ill-health, may be reluctant to live in noisy conditions. Little information is available in the DEBATS study to judge whether people with psychological problems have chosen not to live close to airports. However, if this had occurred, it would have resulted in an underestimation of the association between aircraft noise exposure and psychological ill-health in this study. It is therefore possible that a background of better mental health in the higher noise zones could hide noise effects on psychological ill-health in this study.

It is unlikely that a lack of statistical power caused the failure of the present analysis to find a significant association between aircraft noise exposure in dB and psychological ill-health. Indeed, the number of participants included in the DEBATS study ( $n = 1244$ ) was very significant. Other studies did not observe any association in this regard, despite a higher number of participants and thus greater statistical power: 2671 people were included in the study by van Kamp et al. [28], and 2861 in the one by Miyakawa et al. [27]. Moreover, a significant association was previously shown between aircraft noise exposure and a smaller variation in cortisol levels among the participants in the DEBATS study [31]. This finding provides some support for a link between psychological stress and aircraft noise exposure, and, as endocrine distress could lead to psychological symptoms such as depression or anxiety [22,23], it suggests a method by which aircraft noise exposure could cause psychological ill-health. Nevertheless, such an association was not observed in the present analysis.

A more appropriate indicator of psychological distress than the GHQ might show a relationship with aircraft noise exposure in dB. The fact that psychological ill-health was estimated using a questionnaire could be a limitation in the present study although it has been used by most previous studies on psychological illness [26–29,34,50]. The GHQ-12 is a reliable screening questionnaire that is particularly recommended for identifying minor psychological disorders within community settings. Since the GHQ-12 is brief, simple, easy to complete, and its application in research settings as a screening tool is well documented, the GHQ-12 has been widely used in large-scale studies in the way that it can serve as a general indicator of distress. Nevertheless, it is not a tool for indicating a clinical diagnosis. Moreover, the double dichotomization (of the response scale by using the bimodal scoring method and of the total score by considering participants with a total score  $\geq 3$  as having

psychological ill-health) raised the question of the sensitivity of the scale measuring psychological disorders. However, the results remained similar when the four-point response scale of the 12 questions was scored using the Likert scoring method (0, 1, 2, 3, respectively) or when linear regression models with the total score as a continuous outcome variable were used. Prescribed and non-prescribed medication could also be used as proxies to characterize mental health. For example, the largest study to date, which included around six major European airports—the HYPertension and Exposure to Noise near Airports (HYENA) study—found that a 10 dB increase in day-time ( $L_{Aeq, 6hr-22hr}$ ) or night-time ( $L_{night}$ ) aircraft noise was associated with a 28% increase in anxiety medication use, but not with anti-depressant medication use [51]. Information about prescribed and non-prescribed medication taken by the participants was also collected in the present study. The results presented here considered anti-depressant medication to be a confounding factor but they remained unchanged when this variable was not introduced in the models. Further research is necessary to better understand the relationships between aircraft noise exposure and medication use (including anti-depressant use).

Only a standardized clinical interview including questions about the number and the severity of symptoms can measure psychiatric disorders, but this can be expensive and time consuming for large-scale epidemiological studies and the response rate may be low. In the last few years, some epidemiological studies have tried to investigate mental health based on clinical diagnosis and average noise exposure—both from road traffic and airport noise. In Germany, Urban et al. suggest that exposure to residential road traffic noise increases the risk of depressive symptoms [52]. A large case-control study in the region of Frankfurt international airport by Seidler et al. indicates that traffic noise exposure—from aircraft, road traffic, and railway—might lead to depression [53]. However, further prospective research is needed to confirm the results of these studies and to deepen knowledge of the causal pathway between noise exposure and depression.

## 5. Conclusions

The DEBATS study is the first in France and one of only very few in Europe to investigate the relationship between long-term aircraft noise exposure and psychological ill-health in populations living near airports. The results of this study are consistent with those found in the literature, suggesting no association between aircraft noise exposure in dB and psychological ill-health evaluated with the GHQ, but showing an association between noise sensitivity or annoyance due to aircraft noise and psychological ill-health. In addition, a gradient was shown between annoyance due to aircraft noise and psychological ill-health. These findings support the hypothesis that psychological aspects such as noise annoyance and noise sensitivity play important roles in the association between environmental noise and adverse effects on health. Nevertheless, further research is needed to disentangle the possible effects of noise, sensitivity to noise, and annoyance due to noise on psychological ill-health, as well as how these factors are linked.

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