

RSP

RiverOak Strategic Partners

Comments on Local Impact Reports

TR020002/D4/LIRC

Examination Document



Project Name:	Manston Airport Development Consent Order
Application Ref:	TR020002
Submission Deadline:	4
Date:	8 March 2019

Technical note:

Manston Airport DCO: Comments on Local Impact Reports

1. Introduction

Local Impact Reports (LIRs) were submitted to the Examining Authority (ExA) at Deadline 3 (15 February 2019) by the following Local Authorities:

- Kent County Council;
- Canterbury City Council;
- Dover District Council; and
- Thanet District Council.

This Technical Note summarises the issues raised in the LIRs and provides RiverOak Strategic Partners' (the Applicant's) response.

Table 1.1 Issues raised in the Local Impact Reports and the Applicant’s response

Local Authority	Topic	Issue	Applicants Response
Kent County Council	Highways and transportation	“It is not agreed that little weight should be placed on the Thanet Transport Strategy (TTS), as it forms a key component of the evidence base for the submitted Draft Local Plan. The Inner Circuit Route Improvement Strategy is certainly relevant and should be reflected in any proposals for the Manston Airport site to avoid a situation where the DCO scheme effectively prevents robust and affordable highway solutions from being implemented as part of the new Local Plan.”	<p>In the post DCO submission period the Applicant has been engaged with KCC Highway and Transportation to undertake further transport assessment work which incorporates the aspirations of the Thanet Transport Strategy (TTS). This has included:</p> <ul style="list-style-type: none"> • Identification of an alternative alignment to the route through the Northern Grass Area (NGA) as identified in the TTS for the Manston Haine Link which is part of the Inner Circuit Route Improvement Strategy; and • Agreement on the modelling of the Development traffic using the Thanet Strategic Traffic Model (TSTM). The TSTM models the Local Plan growth and the TTS interventions. <p>The Applicant is undertaking junction assessment work based on the traffic flow outputs from the model and will identify appropriate mitigation accordingly.</p> <p>The Applicant intends to produce a revised Transport Assessment and associated appendices documents, and Traffic and Transport Chapter which incorporates these changes by Deadline 5.</p>
Kent County Council	Highways and transportation	“The KCC SATURN model has been developed using recently obtained trip origin and destination data, and is more dynamic in the way it assigns vehicle movements to the local highway network in response to land use change, traffic growth and mitigation. As such it is considered to be the most appropriate and consistent tool for assessing local development of this scale.”	<p>In the post DCO submission period the Applicant has been engaged with KCC Highway and Transportation to undertake modelling of the Development using the TSTM when it became available for third party use in November 2018. The Applicant commissioned KCC’s consultant, Amey, to undertake the modelling work which was completed in December 2018.</p> <p>The Applicant intends to produce a revised Transport Assessment which incorporates the results of the TSTM modelling work by Deadline 5.</p>
Kent County Council	Highways and transportation	“It is important that traffic impact assessment is undertaken consistently in line with the emerging Local Plan evidence base. In view of the above, following a request made by KCC, the KCC SATURN model has recently been utilised under commission by the Applicant to ‘sense check’ the outputs of the modelling work undertaken within the submitted TA (see below).”	<p>As identified above, the Applicant has commissioned KCC’s consultants to undertake modelling of the Development using the TSTM. The results will be presented in a revised Transport Assessment.</p>



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Kent County Council	Highways and transportation	"With regard to Table 3.2 of the TA, the majority of the responses provided to KCC H&T's original consultation response are not accepted, particularly in respect of the assumptions made by aviation experts within the Applicant's project team. Given the proposed uses on the site require a 'first principles' approach to traffic impact assessment, it is considered reasonable to request some objective evidence on which to base the key assumptions in the TA"	During the post DCO submission period, the Applicant has engaged with KCC to address comments related to the Transport Assessment. This has included comments on the traffic generation assumptions for the different land use elements of the Development.
Kent County Council	Highways and transportation	"A full, independent Stage 1 Road Safety Audit is required for all material highway alterations and new site access junctions. This is to ensure that all safety related issues are capable of being addressed prior to the determination of the application and will avoid a situation where the mitigation requires land outside of the Applicant's control. This is particularly important for proposed junction improvements at Spitfire Way/Manston Road, where initial concerns have been raised by the Highway Authority in relation to potential road safety concerns with the"	Stage 1 Road Safety Audits will be undertaken on the proposed access junctions and the proposed mitigation and improvements at offsite junctions and road links.
Kent County Council	Highways and transportation	"The Thanet Parkway Station project remains a material consideration for this proposal. The delivery of a railway station on the periphery of the site would enhance its sustainability credentials, not least as the existing stations in Ramsgate and Birchington are not easily accessible."	<p>A planning application for the Thanet Parkway Station was submitted in June 2018 which is, to-date, undecided. Funding for the scheme has yet to be secured.</p> <p>The Station is included within the TSTM and will be therefore be incorporated into the revised assessment work.</p> <p>Consideration will be given to the routeing of shuttle buses from Thanet Parkway Station to the Development as part of the transport strategy proposals.</p>
Kent County Council	Highways and transportation	"The conclusions in Section 4.9 are not agreed with. The site is not accessible by a range of transport modes, as the constrained nature of the surrounding highway network and related traffic conditions, as well as the lack of pedestrian and cycle facilities and public transport services, act to reduce the attractiveness of non-car travel."	<p>Public transport services will improve as a result of the Proposed Development through the provision of bus services between the railway stations and local area and the site.</p> <p>There will be improvements to pedestrian and cycle to serve and link to the site allocation to the north east of the site – Land off Manston Court Road.</p>
Kent County Council	Highways and transportation	"Given that the future assessment year of the proposed development extends beyond the emerging Thanet Local Plan, site access junctions and off-site highway mitigation should be designed with Local Plan growth taken into account, to avoid a situation where this infrastructure	The Transport Assessment submitted in support of the DCO allowed for the emerging Thanet Local Plan growth within the Temprow growth factors applied.

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		<p>becomes saturated by the end of the Plan period It will also allow an appropriate mitigation strategy to be identified in line with expected patters of growth within the local highway network.”</p>	<p>The revised Transport Assessment is based on the results of the TSTM which includes the traffic generation from the allocated sites within the emerging Thanet Local Plan. In consultation and agreement with KCC, further growth has been added to allow for the full build out of the Development to 2039 beyond the Local Plan and TSTM extent of 2031. The growth has been based on Tempro growth factors.</p>
Kent County Council	Highways and transportation	<p>“The trip generation methodology presented in the submitted TA is heavily based on assumptions that are not adequately justified or referenced to appropriate ‘real world’ examples in a number of cases (notably HGV movement profiles and load factors, and airport staff shift patterns and staffing requirements). This limits the ability of the Highway Authority to comment on their validity with a sufficient degree of confidence. Specific examples include:-</p> <ul style="list-style-type: none"> ● It is forecast that a total of 340,758 tonnes of freight per annum will be reached in Year 20 (Table 6.3). If this is deemed to be the peak handling capacity of the facility, then an appropriate cap should be placed on any grant of Development Consent to ensure that the trip generation assessment presented in the TA is robust. ● The adjustment to the ‘Total HGVs per annum’ figures in Table 6.4 to allow for efficient working should be related to evidence from comparable facilities elsewhere within the UK. ● It is not considered realistic that HGV trips to the cargo facility would arrive and depart in an even profile throughout a typical 24-hour period. It is considered likely that there would be peaks and troughs associated with flight arrivals and departures and/or specific market demands. Moreover, the Planning Authority may place restrictions on night flights and potentially also HGV movements. Appropriate sensitivity testing should be undertaken to allow for these scenarios. ● It is not considered realistic that 80% of departing passengers would arrive at the airport three hours before flight departure. It is envisaged that passenger flights would be short-haul in nature and since the car park is located close to the terminal, and the terminal facilities will be relatively limited in comparison to other UK airports, it is more likely that the majority of passengers would arrive 1-2 hours before their departure time. Indeed, with the increasing uptake of online check-in options and the tendency for short-haul passengers not to place their luggage in the aircraft hold, it is likely that passenger arrival times of less than one-hour prior to departure 	<p>In the Pre-Examination period, the Applicant undertook consultation with KCC and agreement was reached on the trip generation and distribution methodology, which address all of these comments.</p> <p>KCC now accept that the methodology is appropriate subject to the two minor amendments as set out below:</p> <ol style="list-style-type: none"> a) Shared taxi was removed as part of the mode share mix; and b) Arrival times for passengers have been revised so they are closer to the time of the flight departure. <p>Those amendments will be reflected in revised assessments based on the KCC Thanet Strategic Transport Model flow outputs in the revised Transport Assessment expected to be provided for Deadline 5.</p>

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		<p>will be relatively commonplace. Again, evidence from similar airports such as Southend would be valuable in this respect.</p> <ul style="list-style-type: none"> • It is not clear why the passenger mode share for “shared taxi” is anticipated to treble during the daytime (from 2% to 6%) and more than quadruple during the night time (from 2.8% to 11%) over a 20-year period – thereby surpassing the “taxi” mode share – as no significant changes to the relative attractiveness of this mode are proposed. • There is limited information provided as to how the fuel tanker trip generation has been calculated. Further justification will be required in order for there to be sufficient confidence in these figures. • It is noted that the office/administration staff are now assumed to follow a more traditional 9-5 working pattern, which is an improvement on previous assumptions. However, the majority of the operational staff shift patterns appear to avoid the AM and PM peak hours on the local highway network, which is considered overly optimistic and could potentially underestimate their impact. It is recommended that a sensitivity test is applied, whereby at least one-third of the operational staff generate peak hour trips. 	
Kent County Council	Highways and transportation	<p>“There is a lack of robust justification for certain aspects of the trip distribution methodology presented. Examples include the assumed origins and destinations of passenger and freight trips within broad geographical areas, which are simply attributed to the “wider project team”.”</p>	<p>In the Pre-Examination period, the Applicant has undertaken consultation with KCC and agreement has been reached on the trip distribution methodology, which address all of these comments.</p> <p>KCC now accept that the methodology is appropriate.</p> <p>Those amendments will be reflected in revised assessments based on the KCC Thanet Strategic Transport Model flow outputs in the revised Transport Assessment expected to be provided for Deadline 5.</p>
Kent County Council	Highways and transportation	<p>“It is not considered appropriate to distribute the Northern Grass area HGV trips on the same basis as the freight trips, as the nature of these businesses may be significantly different. Indeed, there is ambiguity within the Application around the nature of the uses proposed in the Northern Grass area which makes it difficult for the Local Highway Authority to determine how they would operate.”</p>	<p>In the Pre-Examination period, the Applicant undertook consultation with KCC and agreement was reached on the trip distribution methodology, which address all of these comments.</p> <p>KCC now accept that the methodology is appropriate.</p> <p>Those amendments will be reflected in revised assessments based on the KCC Thanet Strategic Transport Model flow outputs in the revised Transport Assessment expected to be provided for Deadline 5.</p>

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Kent County Council	Highways and transportation	"It is evident that the development trip assignment methodology has been principally based upon the Google real-time journey planner tool, which is a method often employed by transport planning professionals to assess likely vehicle routing in the absence of more locally specific modelling tools. However, in line with the previous comment regarding the limitations of spreadsheet traffic modelling, this approach is not capable of reflecting the changes in trip assignment arising from future development, traffic growth and associated transport mitigation measures; hence the need for the KCC SATURN model to be utilised for validation purposes."	As part of the revised Transport Assessment, using the TSTM, the development traffic has been assigned onto the road network based on the modelling assignment.
Kent County Council	Highways and transportation	"Whilst the use of adjusted TEMPRO traffic growth factors is noted, it is vital that the future year baseline traffic flows arising from this process are validated against those arising from the KCC SATURN model, which is fully aligned with the Draft Local Plan and Transport Strategy. The development is anticipated to build out across a period which extends beyond the current draft Local Plan, as such a spreadsheet approach is not capable of accurately representing the likely traffic conditions or configuration of the local road network within the proposed assessment year. For background growth that is not assessed within the KCC SATURN model (namely that which extends beyond the emerging Local Plan between 2031-2039), use of TEMPRO factors would however be acceptable."	<p>The Transport Assessment submitted in support of the DCO allowed for the emerging Thanet Local Plan growth within the Tempro growth factors applied.</p> <p>The revised Transport Assessment is based on the results of the TSTM which includes the traffic generation from the allocated sites within the emerging Thanet Local Plan. In consultation and agreement with KCC, further growth has been added to allow for the full build out of the Development to 2039 beyond the Local Plan and TSTM extent of 2031. The growth has been based on Tempro growth factors.</p>
Kent County Council	Highways and transportation	"As has been noted, the KCC SATURN model has recently been utilised by the Applicant to 'sense check' the outputs of the modelling work undertaken within the submitted TA... On this basis, it is clearly not possible for the Local Highway Authority to draw firm conclusions as to the future traffic impacts of the Proposed Development until such time as revised junction capacity assessments reflecting the outputs of the KCC SATURN model are undertaken."	No response required.
Kent County Council	Highways and transportation	"It is not considered that the proposed scheme of mitigation for the A256 / Sandwich Road roundabout will deliver practical benefits to the capacity of the junction. There is a known tendency for the ARCADY and PICADY modelling software to exaggerate the impact of minor amendments to kerb radii, flare lengths etc, which do not in reality provide meaningful capacity gains."	<p>Junction 1The scheme identified delivers a nil detriment improvement which is an appropriate approach and is not intended to solve an existing issue. Should KCC Highways wish to progress a larger improvement, the cost of implementing the mitigation could be used towards this.</p> <p>Arcady software is an industry standard tool which estimates capacity based on the relationship between the variables that influence capacity, namely junction</p>

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			<p>geometries and traffic flows. It is appropriate and acceptable to propose that amendments to the junction geometry variables will produce improvements to capacities in order to define the theoretical capacity of the junction. This is an industry standard approach to identifying mitigation. This is a nil detriment improvement scheme.</p> <p>The revised Transport Assessment will identify whether an improvement is still required at this junction.</p>
Kent County Council	Highways and transportation	Should the proposed scheme of mitigation for the A299 / A256 roundabout be taken forward, it will require refinement as the lane markings on the A256 northbound approach to the junction are potentially confusing and do not cater for right turning movements. The ARCADY assessment should be updated accordingly. Additionally, swept path analysis should be undertaken to demonstrate that the three proposed circulatory lanes would operate safely."	<p>Junction 2</p> <p>DMRB Volume 6 Section 2 Part 3 TD 16/07 states "8.28 The use of right pointing arrows on lane dedication signs or as markings on the road is not permitted on roundabout approaches (except at mini-roundabouts). This is to avoid confusing drivers, particularly those from overseas, over which way to proceed around the roundabout. Where a right hand lane is dedicated to a specific destination, it should be associated with an ahead arrow on the approach. A right pointing arrow may be used on the circulatory carriageway." For this reason, no right turn arrow has been located on approach. That aside, lane marking will be refined through the detailed design process and as such are subject to change.</p> <p>The revised Transport Assessment will identify whether an improvement is still required at this junction. A Road Safety Audit and swept path assessments would be included.</p>
Kent County Council	Highways and transportation	"It is not considered that the proposed schemes of mitigation for the A299 / B2190 and A299 / A253 roundabouts will deliver practical benefits to the capacity of the junctions, in view of the limited flare lengths proposed. There are potential highway safety implications arising from these short flare lengths, particularly on the A299 exit arms. This serves to underline the need for all mitigation proposals to be subject to an independent Stage 1 Road Safety Audit. Swept path analysis should be undertaken to demonstrate that the three proposed circulatory lanes would operate safely."	<p>Junctions 4 & 6.</p> <p>As stated previously, Arcady software estimates capacity based on the relationship between the variables that influence capacity. It is appropriate and acceptable to propose that amendments to the junction geometry variables will produce improvements to capacities in order to define the theoretical capacity of the junction.</p> <p>The revised Transport Assessment will identify whether an improvement is still required at this junction. A Road Safety Audit and swept path assessments would be included.</p>
Kent County Council	Highways and transportation	"It is apparent that the proposed scheme of mitigation for the A299 / A28 roundabout does not adequately address the impact of the Proposed Development, with significant residual queue length increases	<p>Junction 7</p> <p>The performance of this junction needs to be considered holistically. Total queues at the junction are reduced by 62 PCUs in the AM and 147 PCUs in the</p>

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		remaining on the A28 (East) arm in the AM peak and the A299 (West) arm in the PM peak.”	<p>PM peak hour period. This level of improvement surpasses the required nil detriment level of improvement.</p> <p>The revised Transport Assessment will identify whether an improvement is still required at this junction. A Road Safety Audit and swept path assessments would be included.</p>
Kent County Council	Highways and transportation	“An inconsistent approach is taken to the justification of capacity mitigation requirements. For example, mitigation is proposed to the Shottendane Road / Manston Road / Margate Hill junction, yet the impact of the proposed development is seen to be of a similar order of magnitude at the A28 / Park Lane / Station Road junctions, where mitigation is claimed to be unnecessary. This is not accepted.”	<p>Junctions 8 & 10</p> <p>The network has been considered as a whole, and in doing so, the level of impact at each junction has also been considered. Given the significant queue reductions elsewhere it could have been asserted that both of these junctions could be considered as not requiring mitigation. A compromise of providing mitigation at Junction 10 was considered to be a reasonable approach. To put the two junctions into context Junction 8 only adds 68 vehicles in the AM and 48 during the PM peak hour, whilst Junction 10 adds 80 vehicles during the AM and 75 during the PM peak hour. The larger impact at Junction 10 was considered to be the defining factor in selecting this junction for a mitigation over and above Junction 8.</p> <p>The revised Transport Assessment will identify whether an improvement is still required at this junction. A Road Safety Audit and swept path assessments would be included.</p>
Kent County Council	Highways and transportation	“The Local Highway Authority has significant safety concerns with the proposed scheme of mitigation for the B2050 / Manston Road / Spitfire Way junction, in view of the incorporation of uncontrolled right turns and intervisibility splays between arms which appear to cross third party land.”	<p>Junction 12</p> <p>Non hooking right turns are proposed at this signal installation, which is proposed to sit within a low speed environment. A revised signalled design has been produced which ensures that the intervisibility does not encroach into third party land.</p> <p>A Road Safety Audit will be undertaken which will demonstrate that there are no safety issues with the proposed scheme.</p>
Kent County Council	Highways and transportation	“The proposed scheme of mitigation for the B2050 / Manston Court Road junction is considered inadequate. It is the opinion of the Highway Authority that Manston Court Road would act as a key route to the site from much of Thanet; however it is currently not of an appropriate standard to fulfil this function, due to its traffic calmed nature and constrained geometry. As such, full consideration should be given in the TA to the delivery of the proposed new link road between Westwood and Manston, which features as a key component of the TTS. Given that	<p>Junction 13</p> <p>The junction has been capacity tested and shown to provide sufficient capacity to accommodate the future traffic demands with minimal queues or delays. The mitigation scheme identified therefore addresses the impact of the development flows at the junction.</p> <p>The traffic distribution clearly shows that Manston Court Road is not a key route and that traffic will be distributed around the road network.</p>

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		<p>the proposed commercial development on the Northern Grass appears to serve no functional purpose to the operation of the airport to the south, and the Applicant has to date provided no justification to the contrary, this area can and should be re-designed to include this road."</p>	<p>The Applicant is engaging with KCC Highways with regards to the link road and has identified that it is not appropriate for a public road to route through the development proposals within the Northern Grass Area. An alternative, acceptable alignment has been identified which complies with DMRB standards and the standards identified by KCC Highways. This is being considered as part of the revised Transport Assessment work which is expected to be submitted for Deadline 5.</p>
Kent County Council	Highways and transportation	<p>"Further information is required detailing how the apparently modest scheme of mitigation for the Manston Road / Hartsdown Road / Tivoli Road / College Road / Nash Road junction (comprising a new signal head and stage sequence and new white lining) will take the junction from significantly over-capacity operation to generally within capacity outside of the PM peak hour, as this is not considered plausible on the basis of the details provided."</p>	<p>Junction 15 The current staging sees the both east and west arms run together with non-hooking right turns and then the northern and southern arm separately. The proposed addition of the extra signal head and central reserve amendments permits running the northern and southern arms together thus maximising the capacity of the junction relative to the original configuration.</p> <p>The revised Transport Assessment will identify whether an improvement is still required at this junction. A Road Safety Audit and swept path assessments would be included.</p>
Kent County Council	Highways and transportation	<p>"The proposed scheme of mitigation for the Ramsgate Road / College Road / A254 / Beatrice Road junction would appear to result in a highly unconventional junction layout which is unlikely to be acceptable to the Local Highway Authority, not least due to the lack of intervisibility between the stop lines. Again, an independent Stage 1 Road Safety Audit will need to be submitted as part of any further justification for this scheme in order for an informed position to be identified."</p>	<p>Junction 16 The revised Transport Assessment will identify whether an improvement is still required at this junction. A Road Safety Audit and swept path assessments would be included.</p>
Kent County Council	Highways and transportation	<p>"It is not considered that the proposed scheme of scheme of mitigation for the Ramsgate Road / Poorhole Lane / Margate Road / Star Lane roundabout will deliver practical benefits to the capacity of the junction. There is a known tendency for the ARCADY and PICADY modelling software to exaggerate the impact of minor amendments to kerb radii, flare lengths etc, which do not in reality provide meaningful capacity gains."</p>	<p>Junction 17 As stated previously, Arcady software estimates capacity based on the relationship between the variables that influence capacity. It is appropriate and acceptable to propose that amendments to the junction geometry variables will produce improvements to capacities in order to define the theoretical capacity of the junction.</p> <p>The revised Transport Assessment will identify whether an improvement is still required at this junction. A Road Safety Audit and swept path assessments would be included.</p>

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Kent County Council	Highways and transportation	“The proposed scheme of mitigation for the A256 / Manston Road junctions is not considered appropriate. It would introduce a major signalised junction on the A256 Haine Road, where roundabouts are currently the predominant junction form. Moreover, it is apparent that there are potential highway safety issues with the proposed junction layout, arising from the need for ‘ahead’ traffic in the outside lane to merge to the left within the junction intersection. It is considered that the outside lanes on the northern and southern Haine Road approaches to the junction should be allocated to right turning traffic and the LinSig assessment updated accordingly.”	<p>Junctions 20A-C A stepped change from a standard priority roundabout to a signalled junction is a logical junction upgrade where additional capacity is required and given the distance between this junction and the roundabouts to the north and south it is not considered to be a material consideration. The merge distances proposed are considered adequate.</p> <p>The revised Transport Assessment will identify whether an improvement is still required at this junction. A Road Safety Audit and swept path assessments would be included.</p>
Kent County Council	Highways and transportation	“It is evident that there would be interaction between the A299 / A256 / Sandwich Road / Canterbury Road East roundabout and the adjacent Canterbury Road / Haine Road roundabout in the PM peak following the implementation of the proposed scheme of mitigation, with enhanced queue lengths on the A256 arm arising from the proposed development. This is not acceptable to the Local Highway Authority and must be addressed, with the two junctions assessed within a network model.”	<p>Junction 21A-B The junction model sets out a relative improvement Haine Road N/B and S/B approaches. This is a relative improvement over the existing situation and as such the interactions between the junctions are considered irrelevant as they will be consistent in both scenarios.</p> <p>The revised Transport Assessment will identify whether an improvement is still required at this junction. A Road Safety Audit and swept path assessments would be included.</p>
Kent County Council	Highways and transportation	It is evident that there would be interaction between the B2014 Newington Road / Manston Road junction and the adjacent A255 / B2014 Newington Road roundabout in the PM peak following the implementation of the proposed scheme of mitigation, with enhanced queue lengths on the B2014 (south) arm arising from the proposed development. This is not acceptable to the Local Highway Authority and must be addressed, with the two junctions assessed within a network model.”	<p>Junctions 26 & 27 The improvement proposed shows a relative improvement based on capacity enhancements and as such it can be concluded that the additional capacity will provide benefit to the proposed junction.</p> <p>The revised Transport Assessment will identify whether an improvement is still required at this junction. A Road Safety Audit and swept path assessments would be included.</p>
Kent County Council	Highways and transportation	“It is evident that the capacity assessment files have not been submitted for review for Junctions 23 to 28, which means that a full appraisal cannot be undertaken.”	<p>KCC Highways could have requested this.</p> <p>This will be provided.</p>
Kent County Council	Highways and transportation	“It is not accepted that mitigation for Junctions 1 (A256 / Sandwich Road), 10 (Shottendane Road / Manston Road / Margate Hill), 17 (Ramsgate Road / Poorhole Lane / Margate Road / Star Lane), 26 (Newington Road / Manston Road) and 27 (Newington Road / High Street) should be discounted simply on the basis of the “wider network	<p>It is clear that the package of mitigation measures provides a better than nil detriment scenario in terms of total queues and consequential delays on the surrounding highway network and as such the current position is defended. That said the Applicant will engage with KCC to revisit this position once there is an agreed package of mitigation measures.</p>

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		<p>benefits" claimed for the overall mitigation package put forward. Since the Applicant has not made use of the KCC SATURN model to assess the strategic impact of the proposed development, it is not considered that such a position can be sufficiently justified or evidenced at present. A balanced view on mitigation requirements on the wider highway network may be possible in a scenario where positive and proportionate contributions are made to the emerging TTS."</p>	
Kent County Council	Highways and transportation	<p>"Confirmation should be provided that the Applicant has the ability to implement the proposed scheme of mitigation to the Spitfire Way / Alland Grange Lane junction, as it appears to encroach on third party land."</p>	<p>The need for remote junction upgrades will be reviewed in the light of the revised Transport Assessment to be provided at Deadline 5. If non-highway land is required for such an upgrade it will be secured outside the DCO process.</p>
Kent County Council	Highways and transportation	<p>"It is reiterated that a full, independent Stage 1 Road Safety Audit is required for all new proposed Site access junctions and highway link improvements."</p>	<p>Independent Stage 1 Road Safety Audits will be undertaken and provided.</p>
Kent County Council	Highways and transportation	<p>"The proposal to implement a linked signalised junction arrangement for the Northern Grass Area southern access and the passenger terminal access should be reconsidered. The introduction of signalised junctions is not considered appropriate in this location and indeed, the passenger terminal access junction is shown to operate close to theoretical capacity in the 2039 + Proposed Development scenario on the Manston Road (westbound) arm. It is suggested that uncontrolled junction layouts should be tested in the first instance. There is also doubt about the ability of this form of junction to accommodate future flows pertaining to the Inner Circuit Route Improvement Strategy, which is a key component of the emerging Thanet Transport Strategy."</p>	<p>A signalised junction is not inappropriate and through the junction modelling has been shown to have adequate theoretical capacity. The signal junction arrangements have the added benefit of providing safe pedestrian crossing points.</p> <p>The proposed link road as part of the Inner Circuit Route Improvement has no fixed alignment and an alternative arrangement has been discussed between the Applicant and KCC Highways which would draw traffic away from this section of Manston Road and therefore there would be no issue with future flows as a result of the Inner Circuit Route Improvement.</p>
Kent County Council	Highways and transportation	<p>"Whilst the proposal to include 2.0m footways along the widened sections of Spitfire Way and Manston Road is welcome in principle, it is important that continuous and direct walking routes to local trip generators are provided where possible. It is notable in this respect that it is not proposed to provide such routes to local residential areas (notably Manston village), which is considered necessary in order to promote sustainable transport accessibility to the site by staff in particular. This could further encourage inappropriate pedestrian activity within the carriageway to the detriment of highway safety,"</p>	<p>Consideration can be given to alternative footway provision subject to feasibility.</p>

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Kent County Council	Highways and transportation	“It is considered that use of the B2050 Manston Road through Manston village should be dissuaded, as it is not of an appropriate standard to convey significant additional traffic volumes. This would also have a detrimental effect on local residential amenity. It is anticipated that the implementation of the aforementioned Westwood to Manston link road would have a significant beneficial effect in this regard, which further underscores the importance of including this and other relevant interventions in the TTS within the assessment. It would also facilitate an opportunity to employ traffic management measures within Manston Village to dissuade traffic (particularly HGVs) from travelling through the village.”	<p>The Traffic and Transport ES chapter considers the impact of the quantum of development traffic on the B2050 Manston Road through Manston village.</p> <p>The Applicant is producing a revised Transport Assessment which includes assessment of traffic modelling which includes an alternative alignment for the link road and would result in lower background traffic flows and development traffic on the B2050 Manston Road through Manston village.</p>
Kent County Council	Highways and transportation	“The proposed construction HGV routing strategic is considered appropriate in principle, subject to the prior implementation of an agreed programme of highway and access improvements.”	No response required.
Kent County Council	Highways and transportation	“The success of the Travel Plan will be critical to the delivery of sustainable development on the site; however as drafted, it is considered insufficiently robust.”	The Travel Plan is in outline form and will become a detailed working document as the Proposed Development progresses.
Kent County Council	Highways and transportation	“The mode share targets for staff and passengers should be more explicitly referenced to those achieved at similar UK airports and a detailed review of the measures within their respective Travel Plans and Surface Access Strategies undertaken.”	<p>Each site is unique and dependent on its location and levels of accessibility.</p> <p>The mode share targets have been based on the location of the site, it’s accessibility to public transport and the aspirations of the Applicant to discourage car access and encourage public transport and shared vehicle use.</p> <p>The Applicant engaged with KCC Highways in the post DCO submission period to discuss the traffic generation and distribution. The shared taxi element has been removed from the mode share targets and the mode share proportion redistributed onto the other modes. KCC Highways has accepted this approach.</p>
Kent County Council	Highways and transportation	“The intention to levy a charge for staff car parking is noted and accepted in principle; however consideration should be given to the potential for overspill parking on the local highway network and how this could be mitigated against. The Highway Authority considers that there is a high likelihood of inappropriate parking occurring on the surrounding highway network by staff and passengers who wish to avoid parking charges.”	Car park charges are a means to discourage travel by car. This would be reviewed and revised if it results in an issue with overspill parking onto neighbouring streets.

Local Authority	Topic	Issue	Applicants Response
Kent County Council	Highways and transportation	<p>“The Applicant should make explicit commitments to provide specific measures to enhance the quality of non-car modes of travel at appropriate stages in the build out programme, including the re-routing and frequency enhancement of local bus services (informed by the advice of local operators) and the provision of new and improved walking and cycling routes to the site. The Draft Travel Plan currently lacks such detail, which casts doubt over the achievability of the mode share targets presented.”</p>	<p>The Travel Plan is in outline form and will become a detailed working document as the development progresses.</p>
Kent County Council	Highways and transportation	<p>“KCC H&T will request that a condition be placed on any grant of Development Consent requiring the submission and agreement of a detailed Car Park Management Strategy prior to occupation of the Proposed Development. As stated above, this will need to take account of the potential for overspill parking on the local highway network and how this may be addressed.”</p>	<p>This is acceptable to the Applicant and will form part of the Traffic Management and Green Travel Plan.</p>
Kent County Council	Noise	<p>“In Thanet and the adjacent district of Canterbury, there will have been a turnover of population since the airport ceased operations. The communities that would be affected by a reopened airport cannot be assumed to be used to aviation noise.</p> <p>Furthermore, the perception of how noise might change affects the level of disturbance by noise. The Survey of Noise Attitudes (2017) has shown that a community expecting an airport to be noisier next year will be 30 – 50% more highly annoyed than one expecting an airport to be quieter next year.</p> <p>This research shows that there is a clear need for the Applicant to manage the expectations of communities in relation to noise and also how it might change over years of operation. There is also a need to give communities a sense of control over that noise impact, which includes access to insulation and relocation schemes, and also involvement through representation on the Consultative Committee (not just through Local Authority representation, but by a dedicated member representing environmental and noise interests).”</p>	<p>It is agreed that communities affected by the reopened airport cannot be assumed to be used to aviation noise from Manston Airport, and for that reason the Noise and Vibration assessment presented in Chapter 12 of the ES [APP-034] assumes a situation with no baseline level of noise from Manston Airport.</p> <p>The Noise and Vibration assessment presented in Chapter 12 of the ES [APP-034] is based on a reasonable worst-case scenario, including when the airport is operating at the maximum forecast capacity in Year 20. This forecast manages the expectations of the community in relation to noise and how it may change over years of operation.</p> <p><u>Noise mitigation for communities</u> To manage noise impacts on the community, the Applicant has committed to providing insulation and relocation schemes:</p> <ul style="list-style-type: none"> • The Noise Mitigation Plan [APP-009] commits to providing a noise insulation scheme to residential properties exposed to aircraft noise levels in excess of 63 dB LAeq,16hr (daytime) and / or 55 dB LAeq, 8hr (night time); and • In line with Government guidance, a relocation assistance scheme will be offered by the airport authority to enable those homeowners

Local Authority	Topic	Issue	Applicants Response
			<p>exposed to the highest levels of airport related noise to move away from the Proposed Development. The dwelling relocation assistance will be offered if residents are exposed to unacceptable adverse effects on their health and quality of life. Eligibility will be based upon a dwelling lying within the daytime 69 dB LAeq,16hr contour. If eligible, homeowners will be provided with assistance with the costs of moving away from the Proposed Development.</p> <p><u>Community engagement</u> The Applicant proposes ongoing engagement with stakeholders including local community representatives through an Airport Consultative Committee which will be secured through a requirement in the DCO. The Consultative Committee will be consistent with the Department for Transport Guidelines for Airport Consultative Committees 2014, including the third Category of Section 35 of The Civil Aviation Act 1982 (as amended) and relevant representation from organisations representing the interests of communities surrounding the airport.</p>
Kent County Council	Noise	<p>“The voluntary noise quota requires a commitment on how long it will be in place, as currently there is no reference to whether it is a permanent commitment or subject to review after a defined period.</p> <p>If it is the intention to review the quota scheme, then there should be a defined mechanism by which to do so. For example, this could be through a Noise Action Plan produced in consultation with the Consultative Committee and the public. Such an Action Plan would set targets for measures that could reduce noise impact, which might also include operational measures for how aircraft approach and depart (for example, a runway direction preference in low wind conditions). This would give communities in the area, or those considering living there, an assurance over how much night noise can be expected and therefore could reduce potential disturbance.”</p>	<p>The Applicant proposes that the quota count system will apply in perpetuity, or until agreed to no longer be required by the Local Planning Authority or other relevant authority.</p> <p>Manston Airport will be required to develop, maintain and update a Noise Action Plan requirement under Directive 2002/49/EC relating to the Assessment and Management of Environmental Noise. The Applicant agree that this would be an appropriate method of reviewing and updating all measure set out in Manston Airports Noise Mitigation Plan, including the Quota Count limit.</p> <p>If it were decided to amend the quota count, then this would be affected via an application to the Secretary of State to amend the DCO.</p> <p>With reference to the Noise Action Plan, the airport will comply with all relevant noise policy, including if required, The Environmental Noise (England) Regulations 2006, which, requires major airports (i.e. those with greater than 50,000 movements per year) and an airport in or near to an agglomeration, to develop Action Plans designed to manage noise issues and effects arising from aircraft operations.</p>

Local Authority	Topic	Issue	Applicants Response
Kent County Council	Noise	<p>"Whilst the voluntary noise quota gives a commitment on the level of noise over a year, there is no corresponding movement limit. For example, the quota could be met by any of 6,056 QC/0.5 aircraft, 3,028 QC/1 aircraft (twice as noisy) or 757 QC/4 aircraft (eight times as noisy as QC/0.5) over the year. Residents could be concerned about how many movements they should expect. Although the assessment shows no significant impact by number of awakenings in the night, the research at Gatwick has shown that some people are significantly more sensitive to aircraft noise than others."</p>	<p>The revised Noise Mitigation Plan to be submitted at Deadline 4 now includes a number of additional measures including an annual aircraft movement cap of 26,468 ATMs per annum and a ban on scheduled at night flights between 2300 and 0600.</p>
Kent County Council	Noise	<p>"There is also no seasonal split in the noise quota so theoretically, it could be fully utilised in a winter season (where demand is expected to be higher). So, although it is accepted by KCC that the average busiest night in the winter would be seven air transport movements, there is no mechanism in the NMP to fully assure this."</p>	<p>The Applicant does not consider this is necessary as further measures have now been added to the Noise Mitigation Plan including an annual ATM cap, which will make it unlikely that the winter average of night flights will significantly exceed the figure given.</p>
Kent County Council	Noise	<p>"The proposed insulation scheme has the eligibility criterion of habitable rooms in the 63dB LAeq 16hr contour or bedrooms within the 55dB LAeq 8hr contour. This provides access to £4,000 towards acoustic insulation. The definition of the boundary of the scheme is by the Significant Observable Adverse Effect Level (SOAEL). The relocation scheme is defined by the Unacceptable Adverse Effect Level (UAEL), the 69dB LAeq 16hr contour. These meet the requirements of the Aviation Policy Framework.</p> <p>However, the County Council would encourage the Applicant to go beyond minimum standards, given the increase in sensitivity to aviation noise. The EU Position Paper (2002) and EAA Position Paper (2011) found that 15% more people are highly annoyed at 50dBA just within nine years. Based on projections by the Applicant, in year 20, only 115 properties are within the SOAEL contour, so it might be possible to extend the relocation scheme to that area on a discretionary basis, perhaps if they have experienced a 3dB increase in noise (as per Gatwick's scheme) as use of the Airport increases. Gatwick's insulation scheme is also based on the lower 60dB LAeq 16hr contour."</p>	<p><u>Extension of relocation scheme</u> The Applicant believes it is not necessary to extend the relocation scheme to those 115 dwellings exposed to noise levels above the SOAEL because there is no policy requirement to do so. For the purposes of this proposal, the Significant Adverse Effect Level (SOAEL) has been set at 63 dB LAeq,16h. Government policy states that above this threshold, significant observed adverse effects on health and quality of life can begin to be observed in an average person. The provision of noise insulation will avoid the significant adverse effect.</p> <p><u>Comparison with Gatwick</u> We note the comparison to Gatwick's noise insulation scheme. We do not consider it appropriate to compare Manston Airport with Gatwick in terms of likely noise impacts. A resident living within Gatwick's noise insulation zone may hear up to approximately 400 commercial aircraft per day (25 per hour), whilst a resident located within the Manston 60 dB LAeq,16h noise contour may hear up to 36 aircraft per day in the peak operating year (approximately 2 – 3 commercial aircraft per hour).</p>
Kent County Council	Noise	<p>"Furthermore, it is impossible to insulate an outdoor space and in the summertime with windows open, the effect of acoustic insulation is reduced.</p>	<p>Agreed, the absolute noise level in outdoor spaces cannot be practicably insulated as the noise source is overhead and the nature of any such spaces is that they are outdoors. We disagree that it is impossible to insulate an indoor</p>

Local Authority	Topic	Issue	Applicants Response
		<p>For these reasons, the residents in the 63dB LAeq 16hr contour may still experience significant adverse effects even when insulation is fitted, noting the data at Gatwick where 10% of people have their perception of noise disturbance greatly influenced by the experience outside of the home."</p>	<p>space in the summertime. Our noise insulation scheme will provide ventilation which will avoid the need to open windows.</p>
Kent County Council	Noise	<p>"The relocation scheme applies to home owners only. Consideration should be given to including provision for those in rented accommodation who have been living in the UAEL and SOAEL since the time that the DCO might be granted. ... It would be an equitable gesture to extend support to those affected for a specified time period and at an appropriate financial level."</p>	<p>Given the comparatively low cost associated with moving for those in rented accommodation, it is not considered necessary to extend the scheme in the way proposed.</p>
Kent County Council	Noise	<p>"On a typical busy day in year 20, the Applicant is forecasting the airport to handle 79 air transport movements. By year 20, during the night 16,465 dwellings are in the LOAEL and 225 above the SOAEL. Further, 160 dwellings will be exposed to 5 – 9 events in excess of 60dB during the night. This is likely to result in annoyance, and for those significantly adversely affected, it may result in health impacts ranging from sleep disturbance and stress to cardiovascular conditions. It is therefore vital that an appropriate level of mitigation is offered in terms of insulation and relocation assistance, as well as community involvement in airspace design - including potential for respite, restrictions in night flights and runway preferencing in low wind conditions. Communities affected must know what to expect from a reopened airport in terms of noise impacts, because unexpected noise impacts are more noticeable and cause greater disturbance."</p>	<p>Agreed.</p> <p>The Applicant notes that the figure is 73, not 79. The Noise Mitigation Plan [APP-009] provides mitigation for all dwellings significantly adversely affected by noise.</p>
Kent County Council	Noise	<p>"The Environmental Statement has taken a robust assessment of the likely impacts of operational aviation noise, taking a conservative figure for the Lowest Observed Adverse Effect Level (LOAEL) and conforming to Government policy and guidance from the World Health Organisation and others. This has demonstrated that a number of residential dwellings will be exposed to significant adverse effects, defined as a perceptible change in quality of life."</p>	<p>Agreed.</p>

Local Authority	Topic	Issue	Applicants Response
Kent County Council	Noise	"The County Council requests that the proposed airport scheme should be compliant with World Health Organisation guidelines on Aviation and Noise."	Noted.
Kent County Council	Public Rights of Way	"The County Council would expect monies to be secured to improve the surface of the existing and diverted bridleways to a minimum width of 3m along the entire length, which will include bridleways TR8 and TR10. KCC can supply a cost for this work."	<p>The PRoW Management Strategy (PRoWMS) appended to the Transport Assessment submitted in support of the DCO submission considered TR8 and TR9 in consultation with the KCC PRoW Officer. The PRoWMS included proposals to improve TR8 to a 3m width.</p> <p>TR10 was not identified as an affected route.</p>
Kent County Council	Public Rights of Way	<p>Bridleway TR8</p> <p>"It is requested that contact is made with the KCC PRoW and Access Service at the Applicant's earliest convenience, to discuss any required route diversions. In respect of ongoing maintenance, it will be expected that the site operators will take on ongoing maintenance responsibilities for any landscaping and enhancements along the bridleway and PRoW network.</p> <p>Hedge or vegetation planting required as screening will need to be at least 2m away from the boundary of the bridleway to ensure that the full width of the bridleway is open and available once the hedge matures, and to facilitate future hedge maintenance, without requiring the closure of the bridleway."</p>	The Applicant notes these comments and will discuss the PRoW Strategy with the KCC PRoW and Access Service at an appropriate point in the Examination/post Examination process.
Kent County Council	Public Rights of Way	<p>Bridleway TR9</p> <p>"It is accepted that the part of the bridleway that lies within the site boundary will have to be extinguished and that it is not currently used, as it is a dead-end route.</p> <p>... the County Council requests that the additional connection to Thanet Parkway is still considered by the Applicant, as this will greatly benefit the connectivity of the site and will further increase opportunities available to the local community for recreation, active travel and exercise."</p>	<p>As identified in Section 3.4 of the PRoWMS, a new link from TR9 to the proposed Thanet Parkway Station across the site or around the edge of the site cannot be provided as part of these development proposals.</p> <p>A link across the site would present security and safety risk as it would cross the runway, taxi ways and other infrastructure. It is generally not considered appropriate to have PRoW running through airport sites as for security reasons these are fenced off with only security checks points the access onto the taxi ways and apron of the airport.</p> <p>The alternative route would be a very long route around the eastern side of the site following the perimeter fence that would potentially make it unattractive to users as it would take a long time to take this circuitous route.</p>

Local Authority	Topic	Issue	Applicants Response
			<p>The Applicant has taken advice from aviation experts, Osprey. Their recommendation was to reduce the presence of PRow near the airfield boundary (and Communication, Navigation & Surveillance) and avoid providing any PRow within the licensed boundary of the airfield.</p> <p>For that reason, it was considered, that no new links are to be created around the eastern boundary of the proposed redevelopment</p> <p>Due to the design of the Airport, Fuel Farm and housing estate off King Arthur Road, creating the link set out in emerging local plan would require third party land outside the redline of the proposed DCO application.</p>
Kent County Council	Archaeology	<p>“The County Council welcomes that the results of the geophysical survey and the evaluation trenching undertaken by Stonehill Park on the main part of the airport have become available to the Applicant for consideration in the DCO application. ... Given the detailed information now available to the Applicant, the County Council would expect greater use of the outputs to inform the discussion of the baseline and set out more precisely the archaeology known within the airfield and how it will be affected.”</p>	<p>The baseline presented in the ES [APP-033] represents an appropriate discussion to understand the effects of the proposed scheme, notably that archaeological remains across the site comprise a group of features of various periods, variously truncated by disturbance associated with the construction and use of the existing airport. While particularly significant remains were observed to the western end of the runway, the majority of remains, and those observed within the areas of greatest disturbance presented by the Proposed Development, were of a significance where effects could, in principle, be mitigated through archaeological investigation and recording. More detailed understanding of the baseline will be presented in developing detailed mitigation proposals.</p>
Kent County Council	Archaeology	<p>“It is important to note that the now published Stone Hill Park survey and evaluation were specifically tailored to assess the impacts of the initial development proposal and did not cover a number of areas of potential impact arising from the present DCO proposal. In particular:</p> <ul style="list-style-type: none"> • The area of development proposed north of Manston Road known as the North Grass Area was not included in the geophysical survey or subsequent trial trenching; • The location of the helicopter facility in the south east of the site, and the area proposed for HGV access and earthworks north of the western runway were not tested through trial trenching but had significant geophysical survey results; and 	<p>A detailed archaeological Written Scheme of Investigation will be produced setting out proposals for archaeological investigation which would allow any surviving archaeological remains to be identified and appropriate mitigation to be agreed in line with Requirement 16 of the draft DCO [APP-006].</p>

Local Authority	Topic	Issue	Applicants Response
		<ul style="list-style-type: none"> An extensive arable area proposed initially for a contractor's compound and later an area of car parking has not been surveyed or evaluated." 	
Kent County Council	Archaeology	<p>"It is accepted that the areas mentioned above have not been accessible to the Applicant for the field survey and evaluation that the County Council regards as necessary to understand the implications of the development in those areas. Table 9-4 in the Environmental Statement refers to a telephone conference on the 25th May 2018 between the Applicant and Simon Mason, the County Council's Principal Archaeological Officer. To clarify the position stated in that discussion:</p> <ol style="list-style-type: none"> 1) KCC accepts, as stated, that the Applicant has not been able to access the site for survey and investigation works; 2) The investigations for Stonehill Park provide an adequate picture for the archaeology on the south side of Manston Road within the parameters of the original Stonehill Park planning application. Areas as outlined above have not been sufficiently evaluated to provide an equivalent picture; 3) The wording in the Environmental Statement does not fully convey the position agreed. There is a need to survey and evaluate the North Grass Area prior to development. In the North Grass Area and areas of the airport which have yet to be evaluated, there remains the potential presence of archaeology of a significance that could require preservation in situ as the desirable outcome. The County Council would accept that this can be achieved post determination, as long as there is sufficient - and perhaps substantial - flexibility in the development design to enable preservation to be achieved. The Applicant explained in the teleconference that this can be achieved in the North Grass Area through reduction of the area of business development if required, as that would not compromise the overall position of airport development. 4) Given the above, a DCO requirement should cover the need to preserve the archaeology, including through adjustment of development parameters as well as covering the necessary stages of evaluation and investigation. The requirements should also cover extensive investigation of those areas of the airport where archaeology will be affected by development but is not to be preserved in situ. The County Council welcomes the intention to agree a Written Scheme of Investigation with KCC for future archaeological investigations." 	<p>Additional archaeological evaluation will be carried out in areas of the site which have not been available for survey. The results of this evaluation work will be used to inform mitigation and development design as appropriate. The draft DCO [APP-006] sets out clear and enforceable proposals for the protection of archaeological remains which are of demonstrable national significance. Preservation in situ could be achieved through modifying the location and extent of planned structures and services, by adopting engineering techniques that minimise ground disturbance, or by a combination of both approaches.</p>

Local Authority	Topic	Issue	Applicants Response
Kent County Council	Archaeology	“The present masterplan illustrates a development where much of the North Grass Area is included within hard development construction other than that area fixed as open space around the radar. The Applicant should demonstrate how flexibility can be achieved to ensure that it is fully understood in the examination of the DCO.”	The draft DCO [APP-006] sets out clear proposals for the protection of archaeological remains which are of demonstrable national significance. Preservation in situ could be achieved through modifying the location and extent of planned structures and services, by adopting engineering techniques that minimise ground disturbance, or by a combination of both approaches.
Kent County Council	Archaeology	“The County Council has agreed that there are substantial areas of the Stone Hill Park findings that can be mitigated through investigation and recording, but that there are also areas identified for preservation in situ including a WWII anti-aircraft battery, the remains of a Roman enclosure possibly associated with the Caesar invasions and the barrow cemeteries on Telegraph Hill, which are likely to be more extensive than the two monuments that were evaluated. Most of these features would potentially be preserved in the present masterplan, although their significance needs to be highlighted so that they are considered as plans evolve.”	The identified remains located at the eastern end of the runway are within an area of the Proposed Development that would be largely retained in its existing condition. Any intrusion would be limited to works associated with the refurbishment of the existing Approach Indicator Lights. Development with the Northern Grass, which has the potential to affect the cemeteries on Telegraph Hill will have regard to the results of archaeological investigation of this area.
Kent County Council	Archaeology	“It is not clear in the wording of Requirement 16 how those areas that have not been evaluated and may have potential preservation requirements are to be addressed.”	Requirement 16 has been updated and submitted to the ExA at Deadline 3.
Kent County Council	Archaeology	“The County Council understands that the Applicant’s consultants are presently drafting a Written Scheme of Investigation for the archaeological works in advance of the development works and looks forward to discussing this in due course. Such a Written Scheme of Investigation will need to be flexible enough to be able to respond to evolving design and impacts of the development.”	The draft Written Scheme of Investigation (WSI) will set out proposals for the further evaluation of areas of the site which have not been subject to previous investigation to allow for the flexibility inherent within the scheme.
Kent County Council	Archaeology	“The Written Scheme of Investigation should outline a programme of post excavation works including assessment, analysis reporting, publication and archiving. Clause 16 (3) allows for this to be implemented although the timescale for completion of a year may be ambitious. In normal circumstances the County Council would expect a post excavation assessment report to be submitted and agreed within 6 months of completion of fieldwork (possibly by phase of development) and an updated project design and timetable agreed for the remainder of the post excavation analysis, reporting and archiving works. Clause 16 (3) allows for that but could be made clearer.”	The draft WSI will allow for the production of reporting on a phased basis in line with established best-practice guidance.

Local Authority	Topic	Issue	Applicants Response
Kent County Council	Archaeology	“Clauses 16 (4) to 16 (6) appear to refer to a process of protecting remains that are found during construction works until a decision can be made on their treatment through investigation. It is not clear how such remains would be identified and by whom. The County Council would expect this aspect to be covered in the Written Scheme of Investigation.”	The draft WSI will set out proposals for further evaluation that will allow for the identification of potentially nationally significant archaeological remains. Establishing the significance of those remains will be undertaken in consultation with Historic England and KCC.
Kent County Council	Built heritage	... it is difficult to understand from the DCO submission which built heritage assets will be affected by the present plans and what may be retained. ...The Applicant should provide a more detailed account of the built heritage assets of the site, their significance and how they will be treated in the proposed development.”	Further clarification of this issue has been provided during the Examination at the Applicant response to ExA written Questions HE.1.20 and Appendix HE.1.2.
Kent County Council	Built heritage	“The County Council welcomes the intention to retain the museums and memorial gardens and would support any enhancement opportunities that can be delivered. ... it should be noted that within the present Masterplan the visual relationship of the museum area and the runway will be severed by the proposals with the construction of the cargo hangers and open aspects to the north and east lost through the construction in the North Grass Area.”	The Museums and Memorial Gardens will be retained within a safeguarded museums area that also includes the former RAF Manston ATC Tower and the former RAF Battle Headquarters. These features will be retained within the context of an active airfield, contributing positively through the continuation of aviation operations.
Kent County Council	Freshwater environment	“KCC would highlight that these basins will need to operate to manage surface water in the event of extreme rainfall, and consideration must be given to adequate sizing and operations of the drainage system including the network, basins and associated pump, so that local flood risk is not created. This matter does not appear to be captured and should be considered.”	The outline drainage design incorporates an allowance for extreme rainfall with climate change. The detailed drainage design will include consideration of these elements.
Kent County Council	Freshwater environment	“The draft DCO does not currently include provision for KCC as Lead Local Flood Authority to be part of the review and consultation process in relation to surface water drainage (Surface and Foul Drainage, paragraph 13 of Schedule 2). It is requested that this is amended accordingly.”	Noted. The draft DCO will be amended to reflect this.
Kent County Council	Freshwater environment	“It should be noted that KCC is the statutory consultee for surface water drainage under the terms of the Town and Country Planning (Development Management Procedure) Order 2015 and surface water is not within the EA remit.”	This is understood and acknowledged. However, the EA are the regulator for surface water discharges and were consulted about the permitting regime.

Local Authority	Topic	Issue	Applicants Response
Dover District Council	Economy	"The Council concurs with the Applicant's assessment from a socio-economic perspective, with reference to its overall conclusions."	Agreed.
Dover District Council	Economy	"The Council recognises the potential positive benefits of the proposed development for the local economy and wider East Kent economy. Further clarification was sought regarding the scope of work anticipated to ensure that such economic benefits can be realised and since the commencement of the examination process, the Council, along with a range of stakeholders including education providers, have been actively involved in preparing a S106 agreement regarding education, training, local recruitment and procurement. Additionally, the Council intends to become a member of a Local Employment Partnership Board to address socio-economic matters with the presence of an operational Manston Airport. "	Further information on this matter was submitted to the examiner at First Written Questions.
Dover District Council	Landscape and visual	"The proposed development would result in a visual impact and change in landscape however with regard to the impact from receptors located within the Dover District, further information is required, as detailed in the initial draft SOCG between DDC and RSP submitted at Deadline 3."	The LVIA (Chapter 11 of the ES [APP-034]) assessed the landscape effects upon the Landscape Character Areas within the Dover District as well as the visual effects upon the views from four viewpoints (located within or close to the administrative boundary of DCC) and residential and recreational visual receptors. This included the predicted changes to views as a result of the ATC, cargo facilities and aircraft recycling hangars and concluded that there would be no significant landscape or visual effects as a result of the proposed development upon any of the landscape and visual receptors within the Dover District.
Dover District Council	Noise and vibration	"For communities identified for DDC in the ES [APP/5.2.-2], noise levels will be below the LOAEL LAeq, 16hr and LAeq, 8hr levels presented. The Council concurs with this approach which agrees with national policy when determining likely significant effects of aircraft noise and conforms to current UK airspace policy and the Airports National Policy Statement: New Runway Capacity and Infrastructure Airports in the South East of England"	Agreed.
Dover District Council	Noise and vibration	"Subject to the determination of the DCO, any new or refurbished developments should show that they have considered noise exposure from an operating Manston Airport to ensure that there are no adverse effects arising from aircraft noise. Consideration should be given to the Association of Noise Consultants document, Professional Practice	Agreed.

Local Authority	Topic	Issue	Applicants Response
		Guidance on Planning and Noise (ProPG) for good acoustic design of residential developments.”	
Canterbury City Council	Description of the area	“Volume 1 Chapter 3 of the Applicant’s ES (Document Ref: TR020002/APP/5.2-1) and the Applicant’s Planning Statement and Design & Access Statement provide a sufficient description of the application site.”	Agreed.
Canterbury City Council	Noise and vibration	<p>“... Herne Bay is modelled as being located outside of the night time LOAEL contour of 40 dB, although part of the area of Herne Bay is located within the 80 dBLAS,Max contour.</p> <p>Although a 60 dB LASmax contour is not provided in the Environmental Statement, it is assumed all of Herne Bay is located within this contour.</p> <p>Clarification of the number of arrival night flights over Herne Bay and the number of potential awakenings is requested to enable a full assessment of the potential effects of the proposed development on CCC’s district is required. The calculation of awakenings should also include the population of the areas overflown.”</p>	<p>Agreed</p> <p>Agreed</p> <p>As stated in paragraph 12.7.40 of the ES [APP-034] in the year of maximum capacity the proposed airport is forecast to handle an average of seven aircraft movements on a typical busy night. The likelihood that an aircraft will fly over Herne Bay will depend on the operating conditions at the airport. The N-above contours presented in Figures 12.12 and 12.13 [APP-042] take into account take into account the number and type of aircraft and the probability that an aircraft will use a given take-off or landing route, hence they provide a good indication of the number of arrivals over Herne Bay.</p> <p>The number of potential awakenings at all communities within the study area is fully addressed in paragraphs 12.7.55 to 12.7.57 of the ES. Due to the low number of flights at night, additional awakenings are unlikely in any community surrounding the airport.</p> <p>Paragraph 12.7.57 of the ES includes dwelling counts within the N-above 60 contours.</p>
Canterbury City Council	Noise and vibration	“Figure 12.12 and Figure 12.13 contained in the Environmental Statement present the N-above contours for 60 dB LASmax per night for the opening year and maximum capacity respectively. For the maximum capacity the 0-1 average number of events on a typical night contour (area where there is 0 - 1 event above 80 dB LASmax on a typical night) extends to Herne Bay and the 2-4 N-above contour extends into the the Council’s administrative area. The 60 dB LASmax contour is not provided	A 60dB LASmax contour is not required to determine the significance of noise effects. A 60 dB LASmax contour would show the area that could be exposed to noise from a single aircraft at some point during the operation of Manston Airport. It would assume the loudest aircraft is operating and would take account of all potential flight paths. For the majority of the dwellings within the contour, exposure to noise above 60 dB LASmax would be infrequent.

Local Authority	Topic	Issue	Applicants Response
		<p>in the application and would have a large footprint area. Furthermore, the 60 dB LASmax contour used to inform the N-above 60 dB LASMax Figure and assessments appears to be missing. It is therefore not possible to fully assess the potential effects of the proposed development on CCC's district."</p>	<p>Significance of noise exposure cannot be determined without also considering the frequency and regularity of the noise exposure. The N-above 60 dB LASmax contours take into account the number and type of aircraft and the probability that an aircraft will use a given take-off or landing route and are therefore the appropriate metric for understanding noise impact.</p>
<p>Canterbury City Council</p>	<p>Noise and vibration</p>	<p>"It is noted that the human ears response to maximum sound levels is better approximated by fast time-weighting rather than slow, though aircraft noise traditionally uses slow time weighting for assessment and certification purposes and was also used in a number of the sleep disturbance noise studies that have been used the develop the awakenings assessment. This approach may lead to a slight underestimation of potential effects."</p>	<p>The dose response relationships in the Basner methodology used to predict awakenings for Manston Airport are defined in terms of the slow time weighting. Hence potential effects have not been underestimated.</p>
<p>Canterbury City Council</p>	<p>Noise and vibration</p>	<p>"It is noted noise insulation is offered on the basis of LAeq,8hr at night and not on potential individual aircraft noise events or awakenings and so no properties in Herne Bay would qualify for noise insulation.</p> <p>Although there are no properties within the Council's district that would qualify for noise insulation either during the day or night, it is noted the Noise Mitigation Plan (NMP) does not include provision for ventilation for residential buildings within the grant and also does not cover the full cost of the insulation and as such cannot be assumed to avoid potential significant effects on health and quality of life, closer to the proposed development."</p>	<p>Agreed.</p> <p>The Noise Mitigation Plan [APP-009] has been updated to provide more detail surrounding the noise insulation offer. The revised Noise Mitigation Plan to be submitted at Deadline 4 now includes a number of additional measures related to noise that may further reduce the potential effects on human health. Included within the Noise Mitigation Plan is an annual aircraft movement cap of 26,468 ATMs per annum.</p> <p>The Health Impact Assessment within Chapter 15 of the ES [APP-034] adopts a worst-case scenario when considering the effectiveness of noise mitigation which can be summarised as assuming that it will either have no effect at all or will not be taken up at potential noise receptors. As such the effects of noise on human health have been assessed on the basis that they are not mitigated at all.</p>
<p>Canterbury City Council</p>	<p>Noise and vibration</p>	<p>"It is noted that the Airport National Policy Statement states the government expects a ban on scheduled night flights of six and half hours between 23:00 and 07:00. It is considered that this ban on scheduled night flights of six and half hours between 23:00 and 07:00 should be included in the NMP and use of the quota count for non-scheduled (i.e. delayed departures and arrivals in the night period)</p>	<p>The Airports National Policy Statement (ANPS) provides the <i>"primary basis for decision making on development consent applications for a Northwest Runway at Heathrow Airport, and will be an important and relevant consideration in respect of applications for new runway capacity and other airport infrastructure in London and the South East of England"</i>.</p>

Local Authority	Topic	Issue	Applicants Response
		<p>flights. It is understood the monitoring regime will be developed further during the air space consultation.”</p>	<p>It should be noted that the ANPS requirement to provide a ban on scheduled night flights is in the context of Heathrow Expansion: <i>“3.54 The Heathrow Northwest Runway scheme will be accompanied by a package of measures to mitigate the impact of airport expansion on the environment and affected communities.102 The Government agrees with the Airports Commission’s conclusion that “to make expansion possible...a comprehensive package of accompanying measures [should be recommended to] make the airport’s expansion more acceptable to its local community, and to Londoners generally”. This is expected to include a highly valued scheduled night flight ban of six and a half hours between 11pm and 7am (with the exact start and finish times to be determined following consultation), and the offer of a predictable, though reduced, period of respite for local communities.”</i></p> <p>The Noise Mitigation Plan [APP-009] includes a night time quota count for non-scheduled night flights. The plan will continue to be consulted upon during the DCO process.</p>
<p>Canterbury City Council</p>	<p>Noise and vibration</p>	<p>“The proposed operation of the airport has the potential to result in noise and disturbance to residents living within the Canterbury District, including those in Herne Bay and Whitstable and surrounding settlements. For the reasons given above, CCC are unable to fully assess the potential noise impacts resulting from the operation of the airport on the amenity of its residents.”</p>	<p>See responses to the individual issues above.</p>
<p>Canterbury City Council</p>	<p>Transport and highways</p>	<p>“The transport modelling appears to be silent on the impact on CCC’s district. The localised modelling is limited to junctions surrounding the airport only, while the work undertaken for Highways England does not address passenger, staff and HGV movements within the district. The latter shows a 10% increase in HGV movements on the M2 (J5-6), which they regard as not significant. However, this same traffic will be (a) navigating Brenley Corner (J7,) which we understand is at capacity, and (b) using the A299 through CCC’s District. Consideration also needs to be given to the potential impacts of the Lower Thames Crossing. Given the absence of passenger and staff modelling for the CCC’s District, it is unclear what the scale of the impact on the A28 to Canterbury will be either.”</p>	<p>The study area for the Transport Assessment submitted in support of the DCO was initially scoped with KCC Highway and Transportation. In the Pre-Examination period, the Applicant undertook consultation with KCC and further assessment of the Development has been carried out using KCC’s Thanet Strategic Transport Model. KCC has not identified the need to extend the study area beyond the modelled area.</p> <p>The traffic distribution set out in Section 6.5 of the Transport Assessment submitted in support of the DCO includes distribution assumptions to Mid Kent and the traffic flows are present in Figures 6.6 – 6.29. A revised Transport Assessment is being prepared which will the KCC Thanet Strategic Transport Model flow outputs. This is expected to be provided for Deadline 5. The Applicant is liaising with Highways England regarding the traffic impacts at M2 J7 (Brenley Corner).</p>

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Canterbury City Council	Transport and highways	<p>"KCC, in their Section 56 response as the Local Highway Authority, commented that "the approach to transport modelling within the Transport Statement is not considered to adequately assess future traffic conditions in line with expected growth patterns and infrastructure delivery". They also commented that "the trip generation and distribution methodology presented in the Transport Assessment are heavily based on assumptions which are not adequately justified or referenced to appropriate 'real world' examples...this limits the ability of the Local Highway Authority to comment on their validity with a sufficient degree of confidence to assess the appropriateness of the proposed highway mitigation strategy". The application does not appear to have addressed these matters raised by KCC."</p>	<p>In the Pre-Examination period, the Applicant undertook consultation with KCC and agreement was reached on the trip generation and distribution methodology.</p> <p>KCC now accept that the methodology is appropriate subject to the two minor amendments as set out below:</p> <ul style="list-style-type: none"> a) Shared taxi was removed as part of the mode share mix; and b) Arrival times for passengers have been revised so they are closer to the time of the flight departure. <p>Those amendments will be reflected in revised assessments based on the KCC Thanet Strategic Transport Model flow outputs in the revised Transport Assessment expected to be provided for Deadline 5.</p>
Canterbury City Council	Air quality	<p>"CCC's Environmental Health team have commented that the air quality assessment submitted with the application does not identify any human receptors within CCC's district and raise no objections to the application on air quality grounds."</p>	Agreed.
Canterbury City Council	Socio-economic	<p>"CCC's Policy and Property and Regeneration Teams generally concur with the socio-economic assessment submitted with the application, with reference to its overall conclusions regarding impact/significance."</p>	Agreed.
Canterbury City Council	Socio-economic	<p>"Overall, CCC recognise the generally positive economic impacts for its district associated with the proposed development and so there is some potential for the local economy to benefit and exploit economic opportunities arising out of the proposed development."</p>	Agreed.
Canterbury City Council	Landscape and visual	<p>"The proposed development would result in a visual impact and change in landscape but given the separation distance, it is considered that this would not be significant in respect of CCC's district."</p>	Agreed.
Thanet District Council	Local plan	<p>"as the draft Local Plan is at an advanced stage and likely to be adopted before the decision on whether to grant a dDCO, the policies in the Draft Local Plan are a material consideration when determining this application for a dDCO."</p>	<p>It is agreed that the policies in the Draft Local Plan are important and relevant (to use the phrase in the Planning Act 2008), but not that the draft Local Plan is at an advanced stage. None of the objections to it have been resolved, to the knowledge of the Applicant, and the Examination In Public has not yet commenced.</p>

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Thanet District Council	Socio-economic	“The development has the potential to deliver significant positive socio-economic benefits to the local authority area. Given the Draft Local Plan Policy SP02 seeks to provide a minimum of 5,000 additional jobs over the plan period it is important that the predicted direct and indirect jobs arising from the proposed development are realistic, achievable and robustly assessed.”	Agreed. The basis of the employment calculations is set out in detail in the Environmental Statement (ES[APP-034]) and in the Azimuth Reports (Volumes I-IV) – [APP-085]. Further explanation of the approach taken, the basis of these and the technical assumptions made are in section 14 of the “Applicants answers to first written questions” Doc Ref TR020002/D3/FWQ, submitted for deadline 3 on the 15 th February 2019.
Thanet District Council	Socio-economic	“The proposed commercial development on the Northern Grass does not appear to be functionally required for operational purposes of the airport. A substantial portion of the Northern Grass is not considered to be previous developed land and any development here would be considered as development on a greenfield site in the countryside. The Council has an identified supply of allocated employment land within the district, such as the nearby Manston Business Park, which can accommodate commercial development.”	Annex 4 of the Updated NSIP Justification Document (January 2019) (TR020002/D1/2.3) explains why the Northern Grass land is required to support the nationally significant infrastructure project. The Applicant disagrees that any part of the northern grass should be considered to be greenfield as there is historic use as an airfield going back to the middle of the 20 th Century and the site has long been established as being within the airport boundary.
Thanet District Council	Socio-economic	“The implications of the job creation purported from this project would significantly affect the OAN for housing within the East Kent region. The impact is a likely significant increase in housing requirements in Thanet. This may result in indirect effects, such as additional loss of countryside through increased housing developments and significant new infrastructure demands.”	It is agreed that this should be a relevant consideration within the local plan. However, it is the stated aim of the Applicant that jobs vacancies are filled wherever possible by people who already live in the local area and is disappointed that Thanet District Council consider the creation of jobs to place a burden on its area. Nonetheless the Applicant does not dispute that the local plan housing allocation should be reviewed as part of that separate examination process should TDC have concerns that they have not properly considered the DCO within their planning processes.
Thanet District Council	Socio-economic	“There should be a provision of on-site education/training facility with links to local providers. There is the potential for local employment and training during construction and operational phases which should be secured via appropriate obligations where possible.”	Measures to support increased uptake of jobs by local people are included in section 13.8.33 of the ES [APP-034]. Further details on “the local hiring policy” are in Section 14 of the “Applicants answers to first written questions” Doc Ref TR020002/D3/FWQ, submitted for Deadline 3 on the 15 th February 2019.
Thanet District Council	Socio-economic	“There are likely to be impacts on tourism at the operational stage which will affect local amenity, businesses, the destination and the experience of visitors. Given that tourism is a significant aspect to the local economy in Thanet, it is important that tourists are not deterred from visiting the area both during construction and operational stages of the proposed development.”	It is agreed that it is important that Tourists are not deterred from visiting the area during both construction and operational stages. This has been considered in detail in several chapters of ES [APP-034]. The assessment of amenity effects in Chapter 13: Socio-economics of the ES draws on the technical analysis in Chapter 12: Noise and Vibration and Chapter 14: Traffic and Transport of the ES [APP-034] in particular.

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			Chapter 13 of the ES considers the balance of effects and notes that up to 1.4 million passengers are expected by year 20 resulting in a minor beneficial impact. Further details on potential adverse effects on the tourism trade are in Section 14 of the "Applicants answers to first written questions" Doc Ref TR020002/D3/FWQ, submitted for Deadline 3 on the 15 th February 2019.
Thanet District Council	Socio-economic	"There are likely to be disruptions to local communities and amenity impacts on tourism during operation of the airport. All indicative flight paths would travel over Ramsgate, and night flight mitigation would not impact on the multiple flights during the day that could adversely affect local business, inward investment, the expanding filming industry and a successful tourism sector."	<p>Effects on amenity and on tourism is considered in detail in several chapters of ES – [APP-034]. The assessment of amenity effects in Chapter 13: Socio-economics of the ES draws on the technical analysis in Chapter: 12 Noise and Vibration and Chapter 14: Traffic and Transport of the ES [APP-034] in particular.</p> <p>Chapter 13 of the ES considers the balance of effects and notes that up to 1.4 million passengers are expected by year 20 resulting in a minor beneficial impact. Further details on potential adverse effects on the tourism trade are in Section 14 of the "Applicants answers to first written questions" Doc Ref TR020002/D3/FWQ, submitted for Deadline 3 on the 15th February 2019.</p>
Thanet District Council	Socio-economic	"The proposed development is likely to lead to additional burdens on local services as it would result in the increase in residence of operational workers in the district. In addition, the operational workers are likely to have a positive economic impact on the local economy."	<p>Additional burdens on local services are considered specifically in the ES [APP-034]. This concludes that the majority of construction workers will reside close to the site, i.e. within Kent, and are not expected to relocate. The same conclusion is drawn for operational employees, hence significant additional demands for educational and health facilities, for example, are not expected.</p> <p>It is agreed that additional operational workers are likely to have a positive economic impact on the local economy and this factor forms part of the assessment within the ES – [APP-034].</p>
Thanet District Council	Socio-economic	"The proposed DCO boundary includes part of Manston Green which is allocated in the draft Local Plan and has an extant planning permission for 785 dwellings. The permitted scheme makes allowance for the land required for Manston Airport landing lights and so does not appear to be adversely affected by the DCO."	Agreed.
Thanet District Council	Socio-economic	"There remains significant uncertainty about whether the socio-economic benefits from the proposed development, in terms of job creation, attract significant weight in support of the proposal, with these benefits potentially overstated in Section 13 of the ES. It is not considered that sufficient and convincing evidence has been provided to	The basis of the employment calculations is set out in detail in the Azimuth Reports (Volumes I-IV) [APP-085]. Further explanation of the approach taken, the basis of these and the technical assumptions made are in Section 14 of the "Applicants answers to first written questions" Doc Ref TR020002/D3/FWQ, submitted for Deadline 3 on the 15 th February 2019.

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		demonstrate the Applicant's claim that the effect on the economy of Thanet would be "major beneficial - significant" due to the limitations in the evidence produced."	In terms of the ES [APP-034], at construction stage, a quantitative comparison is made between the average number of jobs expected to be required at the proposed development, with the size of the construction workforce in Thanet and in Kent. A similar exercise undertaken for operational stage <i>direct</i> jobs, comparing these direct jobs with employment within three sectors which most closely resemble the employment opportunities created by the proposed development. The indirect/induced and catalytic jobs are expected to be created over a wider range of sectors and are compared to total employment, again in Thanet and Kent.
Thanet District Council	Socio-economic	"Chapter 13 of the ES proposes a number of training opportunities at the construction and operation phases of the development and the use of local recruitment as benefits of the proposed development and additional mitigation measures. However, it is not clear how these would be secured by the dDCO. It is expected that a Section 106 agreement would be required in order to secure the benefits relating to training opportunities and local recruitment that has a direct benefit on the employment and the employability of the workforce in Thanet."	The Applicant is intending, subject to stakeholder approval, to instigate a Local Hiring Policy which will be secured through a s.106 obligation. Further details on "the local hiring policy" are in Section 14 of the "Applicants answers to first written questions" Doc Ref TR020002/D3/FWQ, submitted for Deadline 3 on the 15 th February 2019.
Thanet District Council	Socio-economic	"There is existing space at the allocated Manston Business Park which could be used to office and storage space for operators and users of the airport and thereby supports its operation. No justification has been provided to explain why a further 116,000sqm of floorspace is a required to achieve this aim."	The proposed allocation of Manston Business Park, some 2 miles from the proposed airport does not affect the need for the Northern Grass for airport related development for the reasons summarised in the FWQ response G.1.3 [Doc Ref TR020002/D/FWQ].
Thanet District Council	Socio-economic	"TDC is concerned that, as drafted, the dDCO may not be able to prevent only this general employment land being developed, without any other elements of the airport use coming forward."	See above.
Thanet District Council	Socio-economic	"The number of catalytic jobs at Year 20 stated in the Azimuth Associates report differs slightly from the figures stated in Chapter 13."	The numbers of catalytic jobs in year 20 presented in the Azimuth Reports (Volumes I-IV) [APP-085] are the same as in the ES [APP-034]. Table 11, Page 51 of Volume IV of [APP-085] notes 13,668 catalytic jobs by Y20, this is consistent with the number in Table 13.24 on page 13-14 of the ES [APP-034].
Thanet District Council	Socio-economic	"The study area for Lydd Airport as defined in their ES overlaps with the study area of Manston Airport. Therefore, there may be some conflict	Lydd Airport was not considered in the CIA in the ES [APP-034] as it falls outside of the screening criteria used to determine whether new or existing

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		<p>regarding the socioeconomic impacts associated between Manston Airport and the development permitted at Lydd Airport. Despite this potential issue, it appears that Lydd Airport has not been considered in the application or within the ES as a potential cumulative effect particularly for the socio-economic impacts.”</p>	<p>developments should be taken account of (refer to paragraph 18.4.3 and 18.4.13 of the ES [APP-034]). In this regard it is over 50km from the proposed development at Manston. In terms of the socio-economic impact the assumptions are contained within the Azimuth Report [APP-085] and therefore socio-economic impact assessment do not assume transfer of business from Lydd Airport and as such there is no reason to assume any cumulative socio-economic impact would occur.</p>
<p>Thanet District Council</p>	<p>Socio-economic</p>	<p>“The impact is a likely significant increase in housing land requirements in Thanet. This may result in indirect effects, such as additional loss of countryside through housing development and significant new infrastructure demands, which has not been assessed. However, contrary to this claim, the Planning Statement does not make reference to the OAN for housing and does not clearly assess this impact. Consequently, the ramifications for this on Thanet’s countryside have not been adequately assessed within the Applicant’s submission (including within the socio-economic and landscape visual impact sections of the ES).”</p>	<p>Additional burdens on local services are considered specifically in the ES [APP-034]. This concludes that the majority of construction workers will reside close to the site, i.e. within Kent, and are not expected to relocate. The same conclusion is drawn for operational employees, hence significant additional demands are not expected.</p>
<p>Thanet District Council</p>	<p>Socio-economic</p>	<p>“Given that the airport has been closed for several years, the number of jobs in the airport industry sector in the area are minimal. Whilst re-opening the airport could create a significant number of jobs in the airport industry sector, this does not necessarily translate as a significant impact on the numbers of overall jobs locally or regionally... Therefore, the magnitude of change for the number of jobs created needs to be reassessed against the total number of jobs to reflect the actual impact on employment. This could mean that the 8.3% positive change is no longer of major beneficial significance.”</p>	<p>A comparison of direct employment opportunities created by the proposed development against total employment in Thanet would still be considered as a major change. For context, total employment in Thanet has risen from 31,000 (1997) to 42,000 (2017), equating to an increase of 12,000 jobs. By Year 20, direct employment opportunities created from the proposed development (approximately 3,417, refer to ES Table 13.25) will therefore comprise approximately 28.5% of total jobs generated across the economy of Thanet over the past period of 20 years.</p> <p>Further, re-assessment is not considered necessary since for operational employment, direct jobs were compared with existing employment in Thanet in three sectors which most broadly resemble the employment opportunities created by the proposed development (paragraph 13.8.15 of the ES [APP-034]. This provides an indication of the scale of change in local employment in related sectors. Comparisons were also drawn against Kent. This was completed transparently. Indirect/induced and catalytic jobs are expected to be created over a wider range of sectors, so the quantitative change was compared total employment.</p> <p>The basis of the employment calculations is set out in detail in the Azimuth Reports (Volumes I-IV) [APP-085]. Further explanation of the approach taken, the basis of these and the technical assumptions made are in section 14 of the</p>

Local Authority	Topic	Issue	Applicants Response
Thanet District Council	Socio-economic	"It is also unclear if jobs in the airport industry sector have more socio-economic benefits compared to other sectors, i.e. are wages higher in this industry than the national average. If it is proven that jobs in the airport sector generate significantly higher wages than the national average wage then there may be a case for only assessing airport industry sector jobs."	"Applicants answers to first written questions" Doc Ref TR020002/D3/FWQ, submitted for deadline 3 on the 15th February 2019.
Thanet District Council	Socio-economic	"It is also unclear if jobs in the airport industry sector have more socio-economic benefits compared to other sectors, i.e. are wages higher in this industry than the national average. If it is proven that jobs in the airport sector generate significantly higher wages than the national average wage then there may be a case for only assessing airport industry sector jobs."	<p>The ES doesn't compare the socio-economic benefits of jobs in different sectors. However, the types of direct jobs are expected to fall within a range of roles, with different wage rates and these are described in paragraph 13.8.15 of the ES.</p> <p>At construction stage, a quantitative comparison is made between the average number of jobs expected to be required at the proposed development, with the size of the construction workforce in Thanet and in Kent. Thus, gives an indication of the size of the sector, the degree of change and the extent of the local workforce with potentially relevant skills.</p> <p>A similar exercise undertaken for operational stage jobs, comparing the direct jobs with employment within three sectors which most closely resemble the employment opportunities created.</p> <p>The indirect/induced and catalytic jobs are expected to be created over a wider range of sectors and are compared to total employment.</p> <p>It is noted that the increases on jobs occur over a 20-year period and fall across a range of occupations.</p>
Thanet District Council	Socio-economic	"Whilst the Azimuth Associates report refers to the Cambridge model, it is not explicitly referred to in the ES. Therefore, it is not clear where the figures in paragraph 13.4.44 of the ES have been sourced from."	The data in paragraph 13.4.44 of the Environmental Statement [APP-034] is based on data from Destination Research 2016 in the Azimuth Reports (Volumes I-IV) [APP-085]. Specifically, paragraph 7.2.2 and table 8 on page 41 of Volume IV of APP-085.
Thanet District Council	Noise and Vibration	"The Noise Mitigation Plan states that the airport operator will seek to operate take-offs from Runway 28 and landings on Runway 10 subject to such operations being in accordance with CAA guidance and the aircraft operator's own limitations and safety management systems. This provides no certainty that the airport will operate in this manner."	The ES [APP-034] is based on a worst-case scenario and as such runway preference has not been taken into account in the noise assessment. The Airspace Change application to the CAA will finalise the precise flight paths to be used. The CAA is expected to adopt the least impacting flight path available within safety parameters which would be expected to be runway 10/28 proposal. A sensitivity analysis showing the likely noise levels has been submitted to the ExA at Deadline 4.
Thanet District Council	Noise and Vibration	"Cargo operations are more likely to occur 24 hours a	The night-time noise assessment presented in Chapter 12 is based upon the forecast of future operations presented in Appendix 3.3 [APP-044].

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		<p>day to meet business needs and are have less operational limitations than passenger flights. Therefore, any night time flights will need to be robustly assessed and carefully monitored."</p>	<p>The revised Noise Mitigation Plan now excludes all departures and scheduled landings during the night-time period.</p>
<p>Thanet District Council</p>	<p>Noise and Vibration</p>	<p>The airport site itself is approximately 1km from the Thanet Coast & Sandwich Bay Ramsar site and SPA, Thanet Coast SAC, the Sandwich Bay to Hacklinge Marshes SSSI and the Sandwich and Pegwell Bay National Nature Reserve, although the outfall corridor goes through/under all these designations. These designations are likely to be sensitive to noise and vibration and whilst they are within the 2km study area they have not been assessed in the noise assessment.</p>	<p>Chapter 7: Biodiversity of the ES [APP-033], and the Report to Inform Appropriate Assessment (RIAA), Appendix 7.1 of the ES [App-044], include assessments of the effects of noise disturbance on the interest features of these nationally and internationally designated sites.</p>
<p>Thanet District Council</p>	<p>Noise and Vibration</p>	<p>"The proposed scheme does not mitigate the significant effects on schools, noise sensitive receptors and gardens and the ability of the mitigation proposed to remove significant effects has not been demonstrated in the ES."</p>	<p>The ES [APP-034] demonstrates that mitigation will avoid the significant effects on health and quality of life from noise on people in their homes.</p> <p>Mitigation measures to minimise noise generated by the airport were considered in "Review of Potential Aircraft Noise Abatement Operational Procedures Which has been submitted to the ExA at Deadline 4.</p> <p>Significant effects of noise on schools and sensitive non-residential buildings have been identified on a precautionary basis. The noise mitigation plan is being updated to provide community receptors including schools access to a community trust fund.</p>
<p>Thanet District Council</p>	<p>Noise and Vibration</p>	<p>"Night flights have been assessed in the ES and have the potential to cause additional awakenings but the ES considers the potential number of night flights is not considered to cause a significant effect through awakenings. There does not appear to be measures to minimise the effects of night flights and reduce the effects over time, rather than them just increasing in perpetuity, i.e. there is an implication that worsening effects is a consequence of growth."</p>	<p>The revised Noise Mitigation Plan now excludes all departures and scheduled landings during the night-time period. The assessment carried out for the ES [APP-034] remains an appropriate worst-case scenario as the current procedures will allow for emergency landings, medical and humanitarian flights. The updated noise mitigation plan therefore minimises the effects of night flights. A noise related charging mechanism is now included in the revised Noise Mitigation Plan submitted at Deadline 4 (paragraph 16).</p>
<p>Thanet District Council</p>	<p>Noise and Vibration</p>	<p>"The noise insulation grant of £4,000 offered to freehold residents of affected properties may not be sufficient to cover the noise insulation</p>	<p>A revised Noise Mitigation Plan has been submitted at Deadline 4 which will increase the noise insulation grant to a maximum of £10,000. It is not possible to force residents to take up the offer of insulation however the process will be</p>

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		(and ventilation). If there is little uptake of the noise insulation grant, the benefit of noise insulation and ventilation may not be in place and therefore it would not mitigate significant effects. Moreover, adverse effects would remain in external areas such as gardens in any case."	made as simple as possible. It is agreed that there may be some adverse effects on outdoor living spaces, however it is not practicable to directly mitigate such effects and as such a community trust fund has been established to offer affected communities the opportunity to apply for grants towards projects which may include enhancement of outdoor spaces.
Thanet District Council	Noise and Vibration	"The effect of the change in noise levels from aircraft noise has not been given in the ES and the significance of the effect on residential receptors is not given."	<p>The method for evaluating the significance of aviation noise at dwellings between the LOAEL and SOAEL in terms of EIA significance is described in paragraphs 12.6.27 to 12.6.30 and paragraphs 12.6.76 and 12.6.79 of the ES [APP-034].</p> <p>The assessment of EIA significance at dwellings between the LOAEL and SOAEL is set out in paragraphs 12.7.64 to 12.7.72 and Table 12.29 of the ES [APP-034].</p>
Thanet District Council	Noise and Vibration	"The combined effects of the noise sources (aircraft, plant, construction and traffic) has not been assessed and as such the combined effect of the sources has not been considered. Further information is proposed to be requested from the Applicant in the form of overlapping construction noise levels and also the combined noise levels from the proposed development."	<p><u>Combined effects from multiple construction activities</u></p> <p>As stated in paragraph 12.7.11 Construction noise predictions for each activity presented in ES Tables 12.16 to 12.24 [APP-034] present worst-case noise levels for each activity in that the expected noise levels are predicted for one month when plant and equipment is located in the part of the work site closest to the receptor. Noise levels could potentially be substantially lower on other days where the works are not as intense and as construction processes move progressively around the site. Given the duration of each construction phase and the size of the site it is considered that the results presented are representative of the combined impact because the combined impact at any one location would be the level from the nearest source. The noise levels provided in the ES therefore provide a robust and realistic worst-case assessment of the highest noise exposure at sensitive receptors within the vicinity of the works.</p> <p><u>Combined effects of operational sources</u></p> <p>Aircraft air noise and airside ground noise: The combined effects of aircraft air noise and airside ground noise by combining the noise exposure from all sources.</p> <p>Road traffic noise: Paragraphs 12.7.73 to 12.7.77 and Table 12.30 present the assessment of indirect effects of road traffic noise. The assessment demonstrates that there will be a negligible increase in traffic noise on all roads</p>

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			<p>where the development is expected to result in a change in road traffic volumes. This means that it is unlikely that the road traffic noise will contribute to a combined noise effect in combination with noise from other sources.</p> <p><u>Combined effects of construction and operation</u></p> <p>The combined effects of construction and operation traffic were assessed in Table 12.3 of the ES.</p> <p>For daytime construction activities, combined effects of construction are unlikely. A precautionary assessment of construction noise has been undertaken because construction noise has been assessed in relation to the baseline noise levels without the airport operating. No significant effects have been identified.</p> <p>Night time construction is necessary because construction activities to runways, taxiways and other operational parts of the airport cannot be undertaken whilst the airport is being used. Hence combined effects of construction noise and aircraft noise at night are unlikely.</p>
Thanet District Council	Noise and Vibration	"The reason for this difference in ATM's, along with details of the level of ATM's adopted in the noise assessment is unclear as is the relationship between the level of ATM's assessed in the ES and the theoretical capacity of 83,220 ATMs."	The forecast used in the ES [APP-034] is considered to be a realistic worst case scenario. The figure of 83,220 is the 'physical capability' of the number of cargo movements the airport could accommodate, and not envisaged to occur, nor is it applied for as part of the DCO application.
Thanet District Council	Noise and Vibration	"The Applicant will need to provide clear details of the assumptions used in the aircraft noise modelling and a commitment not to exceed these limits or revise the findings of the assessments as otherwise there may be further significant effects than considered in the ES."	<p>Agreed. ES Section 12.1 and ES Table 12.1 describe limitations and assumptions used in the preparation of the ES [APP-034]. The key assumptions are:</p> <ul style="list-style-type: none"> ● Precise airspace arrangements are subject to the Airspace Change Process and are based on prototype arrangements that consider both overfly populations/avoid populations options; ● Aircraft in future are assumed to be as noisy as today (although a trend of reducing noise is likely); and ● The operational aircraft noise assessment uses an average winter's day rather than an average summer's day on the basis that due to importation of perishable vegetables, the

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			<p>largest increase in ATMs is likely to be during the winter months.</p> <p>Further detailed assumptions for aircraft noise are presented in Appendix 12.3 [APP-057].</p>
Thanet District Council	Noise and Vibration	"The sensitivity of caravan parks does not appear to have been considered in the assessment of effects and as such further significant effects may emerge."	<p><u>Caravans used as temporary accommodation</u></p> <p>Facilities that permit occasional overnight stays such as static moorings, camp sites or caravan parks but do not permit long term residential use are not considered to be significantly affected by noise due to construction or operation of the airport due to the short and irregular exposure to noise.</p> <p>The closest caravan parks to the airport are Manston Court and Preston Parks. Based on liability to pay council tax, we understand that no caravans in Manston Court and only one in Preston Parks are permanent residences.</p> <p><u>Caravans used as permanent residential dwellings</u></p> <p>It is considered that permanent residents of caravan parks not more sensitive to aircraft noise than conventional dwellings. The assessment criteria for permanent residential dwellings make the cautious assumption that the dwelling has open windows which would provide an overall external to internal sound reduction of 10 to 15dB. Despite the lower façade sound insulation performance of a caravan relative to a normal dwelling, the sound reduction from the caravan façade with an open window would be similar to that of a conventional dwelling with an open window.</p> <p>We agree that it would be more difficult to provide effective sound insulation to a caravan than a conventional dwelling. However no caravan sites are forecast to be exposed to noise levels less than the sound insulation eligibility thresholds in all years assessed and presented in Chapter 12 of the ES [APP-034].</p>
Thanet District Council	Noise and Vibration	"The DCO application appears allow for a much greater theoretical capacity than has been assessed for the ES. It would therefore appear appropriate to place a limit on the number of flights so that the development would be in accordance with the findings of the ES."	The revised Noise Mitigation Plan which will be submitted at Deadline 4 now includes an annual aircraft movement cap of 26,468 ATMs per annum.

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Thanet District Council	Noise and Vibration	"The DCO application has articles for the development to be in accordance with CEMP, OEMP and NMP but these documents are not finalised (or produced in the case of the OEMP) and therefore TDC should be consulted on the content of these documents and be the approving body."	It is agreed that TDC should be consulted on these documents however, due to the breadth of their content the Secretary of State is identified as the approving body.
Thanet District Council	Noise and Vibration	"The scope of the ES has not included assessment of the combined effects of construction activities or the combined effects of construction and operation."	<p data-bbox="1335 480 1843 502"><u>Combined effects from multiple construction activities</u></p> <p data-bbox="1335 536 2078 903">As stated in paragraph 12.7.11 Construction noise predictions for each activity presented in ES Tables 12.16 to 12.24 [APP-034] present worst-case noise levels for each activity in that the expected noise levels are predicted for one month when plant and equipment is located in the part of the work site closest to the receptor. Noise levels could potentially be substantially lower on other days where the works are not as intense and as construction processes move progressively around the site. Given the duration of each construction phase and the size of the site it is considered that the results presented are representative of the combined impact because the combined impact at any one location would be the level from the nearest source. The noise levels provided in the ES therefore provide a robust and realistic worst-case assessment of the highest noise exposure at sensitive receptors within the vicinity of the works.</p> <p data-bbox="1335 936 1715 959"><u>Combined effects of operational sources</u></p> <p data-bbox="1335 992 2078 1072">Aircraft air noise and airside ground noise: The combined effects of aircraft air noise and airside ground noise by combining the noise exposure from all sources.</p> <p data-bbox="1335 1106 2078 1273">Road traffic noise: Paragraphs 12.7.73 to 12.7.77 and Table 12.30 present the assessment of indirect effects of road traffic noise. The assessment demonstrates that there will be a negligible increase in traffic noise on all roads where the development is expected to result in a change in road traffic volumes. This means that it is unlikely that the road traffic noise will contribute to a combined noise effect in combination with noise from other sources.</p> <p data-bbox="1335 1307 1787 1329"><u>Combined effects of construction and operation</u></p> <p data-bbox="1335 1362 2078 1414">The combined effects of construction and operation traffic were assessed in Table 12.3 of the ES.</p>

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			<p>For daytime construction activities, combined effects of construction are unlikely. A precautionary assessment of construction noise has been undertaken because construction noise has been assessed in relation to the baseline noise levels without the airport operating. No significant effects have been identified.</p> <p>Night time construction is necessary because construction activities to runways, taxiways and other operational parts of the airport cannot be undertaken whilst the airport is being used. Hence combined effects of construction noise and aircraft noise at night are unlikely.</p>
Thanet District Council	Noise and Vibration	<p>"The methodology of the assessment does not include:</p> <ul style="list-style-type: none"> • significant effects from changes in noise levels at residential receptors. • clarity in the awakenings assessment for awakenings across the population overflow. • consideration of receptors on caravan park sites." 	<p>The method for evaluating the significance of aviation noise at dwellings between the LOAEL and SOAEL in terms of EIA significance is described in paragraphs 12.6.27 to 12.6.30 and paragraphs 12.6.76 and 12.6.79 of the ES [APP-034].</p> <p>The assessment of EIA significance at dwellings between the LOAEL and SOAEL is set out in paragraphs 12.7.64 to 12.7.72 and Table 12.29 of the ES [APP-034].</p> <p>As requested by TDC in the PEIR consultation Appendix 12.3 of the ES [APP-057] presents a summary of the methodology used to predict objective awakenings.</p> <p>A response to the consideration of receptors on caravan parks is given above.</p>
Thanet District Council	Noise and Vibration	<p>"The assessment of aircraft noise is based on 72 ATMs during the day and 7 ATMs during the night, in year 20. This is well below the theoretical capacity of the airport."</p>	<p>The revised Noise Mitigation Plan which will be submitted at Deadline 4 now includes an annual aircraft movement cap of 26,468 ATMs per annum.</p>
Thanet District Council	Noise and Vibration	<p>"The noise insulation scheme does not appear to avoid significant effects."</p>	<p>Noted. It is not agreed that the noise insulation scheme will not avoid significant effects, however, the proposed allocation of Manston Business Park, some 2 miles from the proposed airport does not affect the need for the Northern Grass for airport related development for the reasons summarised in the FWQ response G.1.3 [Doc Ref TR020002/D/FWQ]. A revised Noise Mitigation Plan will be submitted at Deadline 4.</p>
Thanet District Council	Noise and Vibration	<p>"The night flight assessment considers 1 flight per hour. If the frequency or number of flights is greater the effect may be greater."</p>	<p>Agreed.</p>

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Thanet District Council	Noise and Vibration	"The "Review of Potential Aircraft Noise Abatement Operational Procedures" document which defines the feasibility of potential abatement procedures was not presented in the application and has been requested to be supplied."	This will be provided at Deadline 4.
Thanet District Council	Noise and Vibration	"There is a preference to use Runway 28 for take-offs and Runway 10 for landings and whilst the Applicant will 'seek' to operate the airport in this way, there is currently nothing to prevent the airport from being operated in a different manner. This could mean that Runway 10 could be used for takeoffs and Runway 28 for landings so that aircrafts will overfly Ramsgate causing adverse noises impacts to the residential areas."	The ES [APP-034] is based on a worst-case scenario and as such runway preference has not been taken into account in the noise assessment. The Airspace Change application to the CAA will finalise the precise flight paths to be used. The CAA will adopt the least impacting flight path available within safety parameters which would be expected to be runway 10/28 proposal. A sensitivity analysis showing the likely noise levels will be submitted at Deadline 4.
Thanet District Council	Noise and Vibration	"There are some concerns associated with the lack of detailed definition of the airspace design and therefore lack of certainty over the effects from airborne aircraft noise. The airspace design is subject to authorisation from the CAA and is therefore subject to change which could affect the proposed impacts either positively or negatively."	<p>Indicative Prototype routes have been developed around design principles, namely 'avoid overflying populations', 'overfly populations' and 'swathe centreline'. An options appraisal of these principles is presented in Appendix 12.3: Methodology [APP-057], which, demonstrates that the variation in the population adversely effected and significantly adversely effected by noise across the design principles is less than 1%, based on the operating conditions modelled.</p> <p>For the purposes of the noise and vibration assessment presented within Chapter 12 [APP-034], the 'Swathe Centreline' principle has been used.</p>
Thanet District Council	Noise and Vibration	"The ES appears to scope out 'Quiet Areas' on the basis that it is "understood that there are no areas within the study area that would be referred to in the NPPF as being prized for their recreational and amenity value". Clarity is sought on where this understanding comes from. Figure 11.38 indicates that there are many areas at the more tranquil end of the tranquillity spectrum (as defined by the Campaign to Protect Rural England)."	<p>To identify areas within the study area that would be referred to in the NPPF as being prized for their recreational and amenity value the following method was adopted:</p> <ul style="list-style-type: none"> ● Review of local area plans within and around study area, including: <ul style="list-style-type: none"> ▶ Surrey County Council ▶ Ramsgate Town Council ▶ Dover District Council ▶ Kent County Council ▶ Canterbury City Council ▶ Thanet District Council

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			<ul style="list-style-type: none"> ● Consultation with TDC EHO (on 12/03/2018) who confirmed that Thanet has no designated Quiet Areas under the Environmental Noise Regs. ● Consultation with Defra (on 13/03/2018) who stated that the 2014 Noise Action Plan for Agglomerations included a process to enable local authorities to designate quiet areas and that to date there have not been any applications in England. Defra were also unaware of any imminent applications and so the situation is unlikely to change in the near future." <p>An assessment of the noise on tranquillity is provided in Chapter 11: Landscape and Visual [APP-034] where the impact on tranquillity of noise is considered in combination with other environmental factors.</p>
Thanet District Council	Noise and Vibration	"the 2km study area for noise also includes the international and national environmental designations around Pegwell Bay These are areas tend to be quiet areas as noise causes adverse impacts upon the fauna for which they are often designated for. Therefore, whilst it is recognised that 'Quiet' is not the only determinant of tranquillity, clarity should be sought on how these areas are being considered in the assessment and where the understanding that there are no quiet areas is derived from."	An assessment of the noise on tranquillity is provided in Chapter 11: Landscape and Visual [APP-034] where the impact on tranquillity of noise is considered in combination with other environmental factors.
Thanet District Council	Noise and Vibration	"There are concerns around the adequacy of the Noise Mitigation Plan (NMP), in particular in relation to a demonstration of how the aims of noise policy are addressed through mitigation. As it stands it is considered that the NMP does not mitigate significant effects and the effects are shown in the ES to worsen with time."	It is not agreed that the Noise Mitigation Plan does not mitigate significant effects. The revised Noise Mitigation Plan which has been be submitted at Deadline 4 provides greater clarity in terms of the relationship with the aims of noise policy.
Thanet District Council	Noise and Vibration	<p>"The following recommendations are made: Assessment and consideration of combined construction activity and combined construction and operational sources. Inclusion of the assumptions used in the ES to be part of the Register of Environmental Actions and Commitments such as the ATMs to be limited to the number in the modelling and adherence to these registered items being required.</p> <ul style="list-style-type: none"> ● "Inclusion of requirement of consultation with TDC on the Noise Mitigation Plan, Construction Environmental Management Plan, 	<p>Addressed above.</p> <p>The Noise Mitigation measures now includes a cap on flights reflecting the assumptions used in the ES. It is agreed that TDC should appoint a representative to the Consultative Committee and this recommendation is included in the revised Noise Mitigation Plan.</p>

Local Authority	Topic	Issue	Applicants Response
		<p>Operational Environment Management Plan and Register and TDC's approval of these documents.</p> <ul style="list-style-type: none"> • The Noise Mitigation Plan needs to be updated to consider measures to minimise the effects of night flights and reduce effects over time. • The Noise Mitigation Plan needs to be updated with a revised noise insulation scheme with consideration of uptake of the scheme to avoid significant effects and a consideration of heritage assets and Caravan Parks. • Clarification of awakenings effects across the population of the areas overflowed by aircraft at night. • A non-technical version of the Noise Mitigation Plan to be provided for lay readers. • A figure to be produced showing the aircraft noise contours for the 63 dB (residential) and 60 dB LAeq,16hr contours for noise insulation eligibility. • Location of designated engine test area to be shown and mitigation for test area to be considered. • Update of the Non-Technical Summary to reflect changes in the ES and the comments made in this LIR. • Limit of ATMs to be explicitly set out in the dDCO requirements. • Night limit of ATMs to be explicitly set out in the dDCO requirements." 	<p>TDC is already a consultee for the CEMP and the OEMP; the Noise Mitigation Plan is a certified document under the DCO and will not be subject to later approval; the Applicant does not agree that TDC should approve these documents.</p> <p>The Noise Mitigation Plan now excludes all departures and scheduled landings during the night-time period.</p> <p>Caravan Parks and heritage assets would be eligible for compensation should they meet the criteria outlined in the noise mitigation plan.</p> <p>Once the Noise Mitigation Plan is agreed, a non-technical version will be provided for lay-readers.</p> <p>The 63dB LAeq contour was provided as part of the ES and the 60dB LAeq contour has been provided at Deadline 4.</p> <p>Engine testing will take place only in areas where aircraft already take off land and taxi within the airport.</p> <p>It is not necessary or appropriate to update the NTS at this time.</p> <p>An ATM limit has now been included in the Noise Mitigation Plan.</p> <p>Night flights are now limited further as described in the Noise Mitigation Plan.</p> <p>.</p>
Thanet District Council	Transport	"It is important that the Applicant makes provision for public transport, cycling facilities and other incentives to reduce the use of private vehicles."	The Travel Plan and Airport Surface Access Strategy include proposals for sustainable transport modes. These documents would be developed further prior to commencement of construction and would be working documents throughout the life of the project.
Thanet District Council	Air quality	"The ES refers to the Thanet District Council (2014) LAQM Progress Report. September 2014, the Council has subsequently reviewed the air quality in the district and published the Thanet District Council (2017) Air Quality Annual Status Report (ASR) – June 2017. The Applicant should reference is made to the ASR which is the most up-to-date air quality document."	Chapter 6 of the ES [APP-034] uses monitoring data from Annual Status Reports (ASR) up to 2017 (which reports on monitoring for the calendar year 2016), though this document was not referenced in the ES. The 2017 ASR was the latest available when the ES was prepared. Subsequently, the 2018 ASR (which contains monitoring for 2017) has been reviewed; the new data does not materially affect the assessment methodology or results.
Thanet District Council	Air quality	"The ES does not include measures designed to "cancel out air quality impacts" in accordance with Thanet District Council's Air Quality Planning Guidance and both existing policy EP05 and proposed policy SE05.	The air quality impacts at High Street St Lawrence are classified as "slight" under criteria used by the Institute for Air quality Management and Environmental Protection UK, but as explained in Chapter 6 of the ES [APP-

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		Impacts on air quality at other locations, where background levels of air pollution are lower, would not be significant. When confirmed, appropriate mitigation should be secured via a DCO requirement, potentially by specifying the required mitigation in an Operational Environmental Management Plan (OEMP), such as proposed in DCO Schedule 2 article 7(2)(a)(viii)."	034], paragraph 6.10.18, this is under the conservative assumption that background concentrations remain at the average level monitored between 2007 and 2015. As noted at paragraph 6.10.8, a more realistic assumption means that the modelled impact becomes negligible. It is therefore not considered necessary to provide additional mitigation. However, the Applicant agrees to implement the "standard mitigation" from the AQ Technical Planning Guidance 2016.
Thanet District Council	Air quality	"Further measures consistent with the relevant IAQM guidance should be incorporated in the Dust Management Plan to ensure that the risk of significant dust impacts is fully mitigated. This should be secured via a DCO requirement, potentially by specifying the required mitigation in a CEMP, such as proposed in DCO Schedule 2 articles 6 and 7(2)(a)(viii)."	Partially agreed. The CEMP would be a live document and is required to contain a Dust Management Plan, which will be consistent IAQM guidance, and the CEMP requires approval by the SoS and this process is captured by the DCO [REP3-186].
Thanet District Council	Air quality	"It is considered that the risk of odours has been adequately addressed in the ES. Appropriate mitigation should be included in the OEMP, and secured via a DCO requirement, potentially by specifying the required mitigation, such as proposed in DCO Schedule 2 article 7(2)(a)(viii)."	Agreed.
Thanet District Council	Air quality	"...it is unclear whether the OEMP will provide sufficient mitigation and how that would be controlled. It is envisaged that a Section 106 agreement would secure funding for a continuous air quality monitoring stations and the use of dispersion modelling to ensure the proposed mitigation measures are effective. As set out later in section 4.13, TDC considers that the OEMP should be a Document to be Certified, with TDC being the relevant approval body."	Agreed.
Thanet District Council	Land quality, contamination and groundwater	"Clarification of the extent of superficial cover overlying the Chalk is required."	As stated in Chapter 10 of the ES [APP-034], the scope and design of a detailed site investigation to be carried out at a later date, which will be agreed following consultation with TDC, Southern Water Services and the Environment Agency. .
Thanet District Council	Land quality, contamination and groundwater	"The adit under the runway which feeds the Lord of the Manor PWS is a highly sensitive receptor protecting this receptor may require rephrasing or redesign of the scheme once the distribution of contamination is better understood."	The adit is recognised as an important receptor and mitigation to avoid impacts which will be designed after the detailed site investigation. The site investigation will be agreed following consultation with TDC, Southern Water and the Environment Agency.

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Thanet District Council	Land quality, contamination and groundwater	"The Lord of the Manor PWS is not identified as a separate receptor. This is an omission and should be included, due to the presence of an adit which feeds the PWS directly below the runway. Specific measures may be needed to protect this receptor that would not apply to the wider aquifer."	The detailed Hydrogeological Impact Assessment, presented as Appendix 8.1 of Chapter 8: Freshwater Environment [APP-033] which includes the Lord of the Manor PWS as a separate receptor and assesses risk from potential on-site contamination.
Thanet District Council	Land quality, contamination and groundwater	"However, there is a lack of baseline data to establish the contamination profile at the site. In agreement with the Environment Agency, additional site investigation data and assessment have not been submitted with the DCO application. Several outstanding concerns therefore remain regarding the specific measures that will be implemented to protect groundwater and human health receptors from what may be a complex contamination profile at the site."	<p>As stated in Chapter 10: Land Quality of the ES [APP-033] , the scope and design of a detailed site investigation to be carried out at a later date will be agreed following consultation with TDC, Southern Water and the Environment Agency.</p> <p>Baseline groundwater quality data is available from Southern Water from 2001 to 2015 which has been considered in the ES in the Hydrogeological Impact Assessment, presented as Appendix 8.1 of Chapter 8: Freshwater Environment [APP-033].</p> <p>Following site investigation and risk assessment, necessary remediation will be designed, agreed with TDC, Southern Water and the Environment Agency, and will be executed.</p>
Thanet District Council	Land quality, contamination and groundwater	"There are several omissions from the report including information on aircraft breaking activities at the site, consideration of climate change with respect to potential risk management, explicit identification of potential radiological contamination, explicit identification of the adit and PWS as receptors, and interrelated effects associated with flooding. The action of landing aircraft on vibration and turbidity in the aquifer has not been considered. The requirement for, nature and duration of soil or groundwater remediation activities, and associated environmental and human health protection measures cannot be ascertained on the basis of the data provided. It is considered that the NTS does not fully reflect the sensitivity of the PWS receptor at the site or the potential for contamination at the site."	<p>Within Chapter 10: Land Quality of the ES [APP-033] it stated 'All sources of contamination will be thoroughly investigated after acceptance or determination, depending on access to the site. We have no records of aircraft breaking activities in the past, however, should these be provided to us we would of course take these into account'.</p> <p>As stated in Chapter 10 of the ES , the scope and design of a detailed site investigation to be carried out at a later date will be agreed following consultation with TDC, Southern Water and the Environment Agency. This will include investigation of potential radiological contamination.</p> <p>The Hydrogeological Impact Assessment, presented as Appendix 8.1 of Chapter 8: Freshwater Environment of the ES [APP-033] includes the Lord of the Manor PWS as a separate receptor and assesses risk from potential on-site contamination.</p> <p>A Flood Risk Assessment is presented in Appendix 8.2 of the ES [APP-048] which concludes the site is at low risk of flooding.</p>

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			<p>No information has been provided to suggest that the vibration of aircraft landing will impact on the turbidity in groundwater which is present at approximately 35m bgl. Should such information be provided, it will be accounted for.</p> <p>The comment regarding the NTS is noted, however the Freshwater Environment section refers to the hydrogeological risk assessment and measures to be incorporated into the scheme to address potential risk to the adit and to the Lord of the Manor PWS. The Land Quality section refers to groundwater in the chalk as a receptor, defines the key likely effect and confirms that the potential affects were assessed as not significant. Further detail in Chapters 8 and 10 of the ES [APP-034].</p>
Thanet District Council	Land quality, contamination and groundwater	"Article 11 of the Schedule 2 requirements of the draft DCO stipulates what must be done in the event that contaminated land, including groundwater, is found at any time when carrying out the authorised development, but does not stipulate that site investigations must be undertaken nor what form they should take."	Noted. As stated in Chapter 10 of the ES [APP-033], the scope and design of a detailed site investigation to be carried out at a later date will be agreed following consultation with TDC, Southern Water and the Environment Agency.
Thanet District Council	Land quality, contamination and groundwater	"There is potential for non-standard remediation methods to be necessary to protect the groundwater receptor, which could affect the phasing and layout of the development. These mitigation measures cannot be defined without an adequate baseline. In addition, Thanet District Council's local plan policy SE03 requires that site investigation and assessment should accompany applications for development of land suspected to be affected by contamination. In the absence of site investigation and assessment, it is considered that a scheme of proposed site investigations should be submitted with the DCO application, along with potential (including worst-case) remediation scenarios that might be employed and a scheme of groundwater monitoring to allow identification of any deterioration in groundwater quality during construction and operation of the development."	<p>Baseline groundwater quality data is available from Southern Water from 2001 to 2015 which has been considered in the ES [APP-034] in the Hydrogeological Impact Assessment, presented as Appendix 8.1 in Chapter 8.</p> <p>As stated in Chapter 10 of the ES [APP-034], the scope and design of a detailed site investigation to be carried out at a later date, which will be agreed following consultation with TDC, Southern Water and the Environment Agency.</p>
Thanet District Council	Land quality, contamination and groundwater	"Chapter 17 of the Environmental Statement covers Major Accidents and Disasters, including plane crashes (referred to as air incidents) which have the potential to release pollutants including fuels and fire-retardant foams on and around the runway. Approval from the EA will be required on specific mitigation for containment of pollutants Including any routing of surface run-off via the on-site interceptors."	Noted.

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Thanet District Council	Land quality, contamination and groundwater	<p>“Article 15 of the Schedule 2 requirements of the draft DCO stipulates that no piling or intrusive works (including drilling) shall be undertaken on the site until a risk assessment and method statement have been submitted to and agreed in writing by the secretary of state following consultation with Southern Water and the Environment Agency, and that works shall then be carried out in accordance with the method statement. This is a necessary requirement to ensure that intrusive works do not cause pollution of the aquifer or adit, however as with Article 12 of Schedule 2, there is no obligation in the draft DCO requirements for site investigations or monitoring of groundwater quality to be undertaken, which are considered necessary for the protection of human health and groundwater quality.”</p>	<p>Agreed. Monitoring requirements are captured by the CEMP which will be updated to include a specific provision relating to groundwater monitoring.</p>
Thanet District Council	Landscape and visual	<p>“Whilst the Council supports the use of the 2017 Thanet Landscape Character Assessment (LCA) as the most up to date study, Policy SP23 in the draft local plan (2018) should also have been assessed as it is this policy to which the LCA relates to and seeks to implement. As part of this implementation, it is the Council’s intention to adopt the LCA as a Supplementary Planning Document and this was advertised and consulted upon to this effect, for 6 weeks from 23rd August to 4th October 2018. Whilst the ES refers to the key characteristics of each of the landscape character areas that have the potential to be affected by the proposal, it does not address the key sensitivities and qualities in any great detail for each LCA. In addition, the ES does not address the Guidelines set out the Council’s document for each of the LCA’s in relation to the proposal as required by draft Policy SP23.”</p>	<p>At the time of preparing the LVIA (submitted as part of the ES in July 2018), the draft local plan (2018) had not been published and the requirements of draft Policy SP23 were not known. The Thanet Local Plan 2006 (saved policies) was the current local planning policy at that time as set out in Table 11.1 of the ES [APP-034].</p>
Thanet District Council	Landscape and visual	<p>“LCA A1: Manston Chalk Plateau is probably the critical area and the ridgeline is vulnerable to development impacts. The Council does not accept the assessment in ES that the susceptibility of the area is “low”. It is dependent on how development proposals affect the ridgeline, and views of the ridgeline, through their precise location and scale. The importance and vulnerability of the skyline of the central chalk plateau is recognised by both the existing policy CC02 and the draft policy SP23.”</p>	<p>Whilst the Sensitivity Assessment contained within Appendix 11.2 [APP- does not include the ridgeline as part of the consideration of value or susceptibility of LCA A1: Manston Chalk Plateau, it does consider and recognise that the largely undeveloped ridgeline is susceptible to change in the sensitivity assessments for the LCAs located to the south (specifically LCA B1, E1, D2 (Ash Level) and D4 (Richborough Castle)) from which this skyline would be viewed.</p>
Thanet District Council	Landscape and visual	<p>“The inclusion of additional viewpoints in line with our previous comments is welcomed. The viewpoint plan submitted broadly accords with the comments in the Council’s response to the PEIR, however</p>	<p>As set out in Table 11.5 of the ES [APP-034], the health and safety risks involved with obtaining viewpoint photography from alongside the busy A256 Haine Road where there is no highway footpath has meant that an alternative</p>

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		<p>viewpoint 5 is sited on Canterbury Road West, rather than on the A256 adjacent to the eastern extent of the site to the south of the Manston Green site. The response to the Council's request in Table 11.5 of the ES is noted, however a viewpoint should have been provided situated to the east of the eastern extent of the site on the Haine Road, given the visibility of the airport from this area from the road and the committed residential development at Manston Green and visual receptors that will be present in this community."</p>	<p>location has been selected. Viewpoint 5 on Canterbury Road West is located close to the south-eastern corner of the Manston Green development.</p>
<p>Thanet District Council</p>	<p>Landscape and visual</p>	<p>"The ES provides wireframes at all 22 locations at Appendix 11.1. These show the highly urbanising effect of the proposed development on the landscape of the district, with a significant effect deemed at multiple viewpoints at Appendix 11.3 and the particular effect of the "aircraft breakdown hangers" shown in the wireframe drawings on residential receptors at Manston, amongst other. It would assist the Council if the methodology for the production of the wireframe analysis could be provided, as this is not outlined in any of the documentation, to ensure transparency and accuracy of the display of visual effects of the development. This will also help with explaining to the community how they were produced."</p>	<p>To produce photographs of suitable quality to be used in the photomontages, the following approach has been adhered to as much as possible:</p> <ul style="list-style-type: none"> ▶ Photographs are taken in weather conditions of clear visibility; ▶ The same exposure is used for all the frames i.e. manual exposure is used to avoid the photographs having different exposures. Alternatively, a camera with exposure lock with a carefully set exposure is used especially where wider panoramas are taken where a proportion of the panorama may be taken partially looking towards the sun (which can be the case in early morning/late afternoon/winter); ▶ A 50 mm lens is used in a 35 mm format (as recommended in Landscape Institute / IEMA Guidelines, 2013); ▶ A 50% overlap is taken between photos to allow the sides of each photo to be removed when splicing the photos together to minimise distortion; ▶ Panoramas are produced by splicing standard photographs with recognised software (e.g. Adobe Photoshop) and not by the use of specialist cameras in order to minimise distortion; ▶ A levelled tripod is used. In addition, the camera is also levelled using a spirit level that sits in the flash socket of an SLR camera; ▶ A very high-quality camera lens is used, the Canon 5D full frame sensor camera; ▶ When taking a photograph the precise location is recorded using a handheld GPS. The orientation to the proposed development, approximate altitude (ground level), date, time of day and weather conditions are recorded for each viewpoint;

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			<ul style="list-style-type: none"> ▶ If, when on site, the proposed viewpoint location is screened by trees or minor variations in topography, the viewpoint is relocated and the new location details recorded and submitted to the relevant parties with reasons for relocation. Winter views if feasible will ensure maximum visibility through vegetation cover; ▶ Where possible, the site is positioned in the middle of the view with frames taken either side to give context; ▶ Where viewpoints are to be used for the cumulative assessment a wide enough panorama is taken to cover the locations of all the developments to be assessed; and ▶ To ensure all photos align all shots are taken from the same location/grid co-ordinate by turning the camera on the tripod on the same spot. ▶ The proposed facility has been modelled as to be superimposed on the photograph to generate the wirelines as follows: <ul style="list-style-type: none"> ▶ Base mapping and height data of the relevant area are set up to real-world OS co-ordinates; ▶ The proposed mass model parameters are located according to the scheme design. These are positioned to match real-world OS co-ordinates. An assumed site level is calculated using LIDAR data; ▶ The parameters of the scheme are modelled in accordance with the planning application; ▶ Viewpoint locations are inputted using GPS data collected on site; ▶ The panoramic photography is then aligned for the relevant viewpoint using GPS data collected on site of existing reference markers visible in the photographs; ▶ The direction and viewing angle of the perspective is then matched with each photographic frame in the panoramic views and the wireline is generated; ▶ Photographs are corrected for colour, brightness and contrast to ensure that image quality is optimised. Model lighting is corrected to match photographic conditions.
			<p>All viewpoint photographs were taken at an elevation of 1.5m above ground level (AGL). The elevation of 1.8m AGL stated in ES Volume 4: Figures [APP-041]</p>

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			is incorrect. The Viewpoint height provided on figures 1 to 26 in Appendix 11.1 refers to camera height at the viewpoint based upon ground level elevation (as derived from a digital terrain model) plus 1.5m and rounded to the nearest 0.5m. The 0.3m difference in level does not effect the assessment.
Thanet District Council	Landscape and visual	“As no detailed mitigation has been produced, nor has this been integrated into the Masterplan, we are not in a position to assess whether the impact on visual receptors and the landscape of the district will be acceptable or not. For example, from viewing the masterplan, no buffer or screening is proposed to be provided along the eastern extent of the site to the south of Manston Road and Manston Village, which will contribute to a significant impact on close views of the site from the village. This will need to be included in Requirement 10 Landscaping.”	A Design Guide which will be submitted at Deadline 4 will provide further details on proposed landscaping.
Thanet District Council	Landscape and visual	“The application only provides viewpoints 6, 9 and 20 as visualisations. Despite previous requests, no night-time visualisation example has been provided. As per previous comments, no assessment of the effects of lighting from the proposed development has been undertaken, which in turn means that night-time visualisations have not been produced for consultation.”	A LVIA addendum has been prepared which assesses the effects of lighting on night-time views. Section 1.1 of the addendum describes the approach taken with regard to the night-time assessment and night-time visualisations.
Thanet District Council	Landscape and visual	“An Outline Lighting Strategy has been provided in Chapter 3 at paragraphs 3.3.75 – 3.3.78. These brief paragraphs state that both the airport and business park lighting has been designed in accordance with the International Commission on Illumination (CIE) Guide: CIE 150:2003 but there is no evidence that any assessment has been undertaken or that this has been achieved. Further information on the impact on visual receptors from this element of the development is still required.”	A LVIA addendum has been prepared which assesses the effects of lighting on night-time views. Appendix A of the addendum contains an External Lighting Strategy which provides details of the Institution of Lighting Professionals (ILP) Environmental Zones thresholds and means of compliance with such thresholds.
Thanet District Council	Landscape and visual	“Moreover, the dDCO does not contain any requirement regarding a full lighting strategy or scheme and the ES does not commit to producing a Lighting Strategy that particularly relates to landscape and visual impacts. Schedule 1 Article 2 is inadequate as it does not contain sufficiently clear references to matters such as the design, height and location of any high mast lighting required within the airport for aprons and stands.”	A LVIA addendum has been prepared which assesses the effects of lighting on night-time views. Appendix A of the addendum contains an External Lighting Strategy which provides details of the Institution of Lighting Professionals (ILP) Environmental Zones thresholds and means of compliance with such thresholds.
Thanet District Council	Landscape and visual	The Register of Environmental Actions and Commitments proposes a number of mitigation measures linked to the Requirement 10 in the	A Design Guide is being prepared which will provide further details.

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		<p>dDCO but states that details regarding the use of building materials, detailing and finish for the roofs and facades of proposed buildings will be submitted when discharging requirements. Therefore, the adequacy of these mitigation measures cannot be fully assessed, however, the dDCO does make provision for these details to be submitted to and approved by the SoS following consultation with local planning authority.</p>	
Thanet District Council	Historic environment	<p>“The noise and vibration impacts arising from the flightpaths can affect the setting of designated heritage assets including the Conservation Areas of Ramsgate, Broadstairs, Minster and Acol. This is a particular concern as the noise mitigation plan proposes to provide noise insulation for buildings to overcome significant effects, however, listed buildings in the flight path may be unable to change windows to provide additional alleviation from aircraft noise without potential harm to the significance of the asset.”</p>	<p>Assessment of the potential effects on heritage assets within Ramsgate and elsewhere outwith the site boundary have been assessed in some detail in accordance with the Historic England Aviation Noise Metric, which is the adopted guidance for assessment of change to setting arising from aviation noise. Harm was found to arise as a result of change to setting on a small number of heritage assets close to the airfield.</p> <p>There are a number of noise attenuation measures that could be appropriate for historic buildings, although the range of such interventions would depend on specific circumstances.</p>
Thanet District Council	Historic environment	<p>“As previously outlined, given the extent of development on the Northern Grass within the proposal, TDC consider that trial trenching should be carried out. Paragraph 9.3.12 of ES states that RiverOak envisage further survey work, including trial trenching, will be undertaken, and it is expected that this will form part of a written scheme for the investigation of areas of archaeological interest as part of Requirement 16. This Requirement is considered adequate in securing the scheme as it also requires archaeological investigation prior to commencement of a particular part of the authorised development. However given the quantum of development which would be approved by the DCO on the Northern Grass, it is unclear however the proposed layout could respond to the discovery of a feature of high significance in this area to allow for preservation in situ.”</p>	<p>The draft DCO [APP-006] sets out clear proposals for the protection of archaeological remains which are of demonstrable national significance. Preservation in situ could be achieved through modifying the location and extent of planned structures and services, by adopting engineering techniques that minimise ground disturbance, or by a combination of both approaches.</p>
Thanet District Council	Historic environment	<p>“The dDCO does not currently account for the indirect effects from the operation of the airport that are likely to affect heritage assets outside the site boundary and in particular where they are situated in the flightpath. As stated, the noise mitigation strategy proposes to provide noise insulation for buildings to overcome significant effects, however,</p>	<p>Assessment of the potential effects on heritage assets within Ramsgate and elsewhere outwith the site boundary have been assessed in some detail in accordance with the Historic England Aviation Noise Metric, this the adopted guidance for the assessment of change to setting arising from aviation noise (as described in paragraph 9.6.21 of Chapter 9 of the ES [APP-034]). Harm was found to arise as a result of change to setting on a small number of heritage</p>

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		<p>listed buildings in the flight path may be unable to change windows to provide additional alleviation from aircraft noise without potential harm to the significance of the asset."</p>	<p>assets close to the airfield. This is described in Section 9.10 of Chapter 9 of the ES [APP-034].</p> <p>With regard to the noise mitigation plan, there are a number of noise attenuation measures that could be appropriate for historic buildings, although the range of such interventions would depend on specific circumstances.</p>
<p>Thanet District Council</p>	<p>Traffic and transportation</p>	<p>"The Transport Assessment should include the expected housing requirement within the submitted draft Thanet Local Plan 2018, including any additional housing requirement resulting from the proposed development. TDC have concerns regarding the potential impacts on the network surrounding the site from both construction and operational phase given the likely level of traffic generated by the proposed development, particularly regarding Spitfire Way, Spitfire Junction and Manston Court Road."</p>	<p>The Transport Assessment [APP-060 to APP-073] submitted in support of the DCO made allowance for the scale of residential and employment growth identified within the draft Local Plan through the application of growth factors. This approach was adopted as there was not a draft Local Plan during the period of development of the Transport Assessment.</p> <p>The Transport Assessment process included junction modelling to identify the impact of the development and appropriate mitigation was identified to provide nil detriment impact, or to improve on the existing situation where possible.</p> <p>Further assessment work is being undertaken using KCC's Thanet Strategic Transport Model which will be part of a revised Transport Assessment which is intended to be submitted for Deadline 5.</p>
<p>Thanet District Council</p>	<p>Traffic and transportation</p>	<p>"The methodology for distributing trips on the network for the Transport Assessment should be based on either the KCC and TDC strategic model, or a similar strategic model compatible with the KCC and TDC built for the purpose of analysing the distribution of trips on the network. A spreadsheet model is considered inappropriate for the level of trip generation created by the project without further information on how compatible this model is with the strategic model. Please refer to KCC Highways and Transportation for further guidance."</p>	<p>The Transport Assessment[APP-060 to APP-073] submitted in support of the DCO adopted an acceptable and appropriate approach to traffic distribution. At the time of the development of the Transport Assessment the TSTM was not available for third party use.</p> <p>Further assessment work is being undertaken using KCC's Thanet Strategic Transport Model which will be part of a revised Transport Assessment which is intended to be submitted for Deadline 5.</p>
<p>Thanet District Council</p>	<p>Traffic and transportation</p>	<p>"Physical improvements to the network are alluded to within the updated PEIR, however, they are only briefly outlined with no detailed plans produced. A crossroad junction proposed at the junction of Spitfire Way and Manston Road would be preferably a roundabout, however we await further information on how this revised junction would operate with the movement proposed. The project does not include the northern link from Manston Road to Westwood Cross within the site. This link</p>	<p>The Transport Assessment submitted in support of the DCO includes details and plans of physical improvements to the network. This supersedes any work within the PEIR.</p> <p>The proposed signalised crossroads at Spitfire Way is an appropriate junction arrangement for the location as it will adequately and safely control the directional flow of traffic and will provide safe, controlled pedestrian crossing</p>

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		forms part of the 'inner circuit' within the Thanet Transport Strategy (TTS)."	<p>points which will serve the adjacent housing and museums as well as the Airport development.</p> <p>As described in the statement of need, the Northern Grass Area as it is aviation related development and that it lies within the airport boundary. As aviation related development it is undesirable to have a link road passing through the site due to the variety of uses that may be required on the site but are at this stage not fully know. Given the availability of an alternative route it is considered that the route proposed by KCC which reflected a previous masterplan is no longer suitable or necessary.</p>
Thanet District Council	Traffic and transportation	"Given that the commercial development on the Northern Grass appears to serve no functional purpose to the operation of the airport to the south, this area can and should be re-designed to include this route. The project will also be required to contribute a proportionate amount to the Manston Airport-Haine Road link in the TTS outside of the extent of the site."	<p>The purpose of the Northern Grass Area is described in the statement of need which describes that it is aviation related development and that it lies within the airport boundary. As aviation related development it is undesirable to have a link road passing through the site due to the variety of uses that may be required on the site but are at this stage not fully know. Given the availability of an alternative route it is considered that the route proposed by KCC which reflected a previous masterplan is no longer suitable or necessary.</p> <p>The Applicant is currently engaged with KCC is assessing the effects of the proposed scheme and will be prepared to make highway contributions commensurate with any impacts resulting from the proposed development. It is expected that this will form part of a Section 106 agreement.</p>
Thanet District Council	Traffic and transportation	"It is understood that an alternative link road may be provided in which discussions are still ongoing between the Applicant, Kent Highways and TDC."	The Applicant has engaged with KCC Highways to identify an alternative alignment which confirms to highways design standards and the standards set by KCC Highways.
Thanet District Council	Traffic and transportation	"Requirement 7(a)(xi) of the dDCO requires traffic management and green travel planning to be undertaken and Requirement 14 stipulates the need to provide a Construction Traffic Management Plan (CTMP). Provision is made under Part 3 relating to streetworks. The CTMP should be approved by TDC rather than the Secretary of State, in consultation with KCC and other relevant local authorities."	It is proposed that the construction traffic management plan should be approved by the Secretary of State in consultation with KCC and TDC highways.
Thanet District Council	Traffic and transportation	"Concerns are raised that the route analysis and traffic distribution for the sensitivity test included in Section 10 is not reliable, as traffic distribution has been derived using assumptions on the level of traffic	The traffic distribution methodology, as set out in the Transport Assessment [APP-060 to APP-073] used is an industry standards approach and was adopted in the absence of the availability of the KCC Thanet Strategic Transport Model.

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		redistribution by the Applicant's consultancy team, rather than being informed by a strategic traffic model with dynamic distribution.."	In the post DCO submission periods, the Applicant has commissioned model runs using the KCC Thanet Strategic Transport Model, the results of which will be presented in the revised Transport Assessment which will be submitted at Deadline 5.
Thanet District Council	Biodiversity	"Requirement 7(a)(ix) requires a plan or chapter to make provision for wildlife management, however, as set out in section 4.13, this Requirement does not make provision for the submission and approval of the Operation Environment Management Plan. As explained further in section 4.13, TDC considers that it rather than the SoS should be the approving body for the OEMP, in consultation with other relevant organisations."	The Secretary of State will be the approving body in consultation with TDC.
Thanet District Council	Biodiversity	"Requirement 8 makes provision for Ecological Mitigation and Requirement 12 makes provision for protected species. Again, TDC should be the approval body for these requirements, in consultation with Natural England and KCC Ecology."	The ecological mitigation, habitat creation and provision for protected species in the Biodiversity Area will form a planning application to TDC.
Thanet District Council	Health and well-being	"Significant concerns are raised about the potential impact from the project at all stages on public health and wellbeing, especially regarding potential sleep disturbance from the operation of the airport and air quality as discussed in other sections of this document."	It is understandable that the planning of any major infrastructure project may engender an array of community concerns. It is the purpose of planning to investigate and address any potential risk from the construction and operation of the proposed development upon the environment and health. In this instance all catalogued community concerns have been assessed (Chapter 15 of the ES [APP-034], and Appendices 15.1 [APP-058]) and addressed through planning, including the potential risk of sleep disturbance from the operation of the airport and changes in local air quality.
Thanet District Council	Health and well-being	"A Health Impact Assessment (HIA) has been provided in Appendix 15.1 of the ES and appears adequate in its assessment. Where necessary, the HIA has drawn on data and effects from the relevant chapters in the EIA. Whilst the dDCO does not contain any references to health and well-being it is acknowledged that the factors that affect health and well-being, such as noise and air quality, have been assessed with mitigation proposed in their standalone chapters and have been included in Requirements in the dDCO which have been discussed in the relevant sections of this document."	Agreed. The mitigation listed in Chapter 15 of the ES [APP-034] in respect of environment and health protection are contained within the Register of Environmental Actions and Commitments [APP-010] and through Requirement 6 (Construction Environmental Management Plan) and Requirement 7 (Operation Environmental Management Plan) of the dDCO the authorised development must be constructed, operated and maintained in accordance with the REAC ensuring that those mitigation measures that are relevant are in place throughout the life of the authorised development. Opportunities to iteratively explore and improve the uptake of community health and wellbeing benefits, and align with local strategic health objectives will be explored and

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Thanet District Council	Climate change	<p>“Whilst the dDCO does not contain any explicit references to climate change the ES chapter on Climate Change assesses the inter-related effects of climate change, such as air quality and noise and vibration. The IEMA guidelines on Greenhouse Gas (GHG) emissions state that all GHG emission are significant. Whilst the level of significance is not clearly defined, the proposed development at worst case scenario in year 20 states a total emissions of 808.7 Kt CO2. This would appear to result in a significant change from the baseline of zero. It is unclear how the Carbon Minimisation Action Plan will adequately off-set the worst-case scenario emissions. Moreover, the Carbon Minimisation Action Plan should be secured via a Requirement in the DCO.”</p>	<p>delivered through ongoing engagement with the Airport Consultative Committee.</p> <p>The rationale for concluding no significant effects is set out in the ES. It is considered that all increases in GHGs <i>might</i> be considered significant (as per the relevant IEMA Guidance) but that proportionate, committed, responses to reduce GHG emissions throughout the construction and operation of a Proposed Development should result in non-significance. The criteria used to define significance does not require the emissions to be off-set.</p> <p>The Carbon Minimisation Action Plan is included in the Register of Environmental Actions and Commitments [APP-010], supplied with the draft DCO [APP-006].</p>
Thanet District Council	Climate change	<p>“A consultation by the UK Government (Aviation 2050 The future of UK aviation) states that aviation accounts for around 7% of the UK’s GHG emissions. The ES states that the worst-case scenario would be an additional contribution of 1.9% of the 2050 target of 37.5 MtCO2. The consultation seeks achieve this target and thus any additional emissions would be considered an adverse significant effect in achieving this goal.”</p>	<p>The Proposed Development results in a comparatively small amount of GHG emissions when set within the context of the wider UK aviation industry and the Committee on Climate Change’s more strenuous planning assumption of 37.5Mt CO2 in 2050. At the time the ES was submitted, Aviation 2050 consultation had not been launched, so was not considered in the assessment.</p> <p>The ANPS (which has been updated from draft to finalised form since submission of the ES), which whilst primarily directed at the development of Heathrow Airport is relevant to other airport developments in the south-east, requires that <i>“the aviation sector makes a significant and cost effective contribution towards reducing global emissions... achieved while minimising the risk of putting UK businesses at a competitive international disadvantage”</i>. It goes to say that <i>“Any increase in carbon emissions alone is not a reason to refuse development consent, unless the increase in carbon emissions resulting from the project is so significant that it would have a material impact on the ability of Government to meet its carbon reduction targets, including carbon budgets”,</i> and <i>“evidence of appropriate mitigation measures (incorporating engineering plans on configuration and layout, and use of materials) in both design and construction should be presented as part of any application for development consent”</i>.</p> <p>Therefore, given that: (i) the Carbon Minimisation Action Plan will reduce GHGs emissions that the Applicant can realistically influence, (ii) the additional GHGs to UK aviation sector emissions are relatively small and thus not deemed</p>

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Thanet District Council	Major accidents and disasters	"The application does not include any reference to the anticipated Public Safety Zones for the airport and the potential impacts regarding the existing or future population including committed and proposed development."	<p>'material', and (iii) the mitigation of aviation emissions is largely an international issue, driven by the Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA), the GHG emissions are considered not significant.</p> <p>It is not considered necessary to declare a PSZ at this time however this will be kept under review and discussed as necessary with TDC.</p>
Thanet District Council	Aircraft maintenance recycling facilities	"Whilst it is accepted that the potential contamination relating to the Aircraft Maintenance Recycling Facilities will be controlled by the EA permitting process the proposed use of the land for this processing is being requested and the proposed impacts should be examined and mitigated where possible. The EA permitting process must undertaken in tandem with the planning process as they are complementary."	<p>Future aircraft recycling would be a permitted activity. The permit would require the operator to mitigate the risks cited. Accepted that the EA permitting process must undertaken in tandem with the planning process as they are complementary however it is necessary to understand further details of the operation and as such the EA permitting process is secured within the DCO.</p> <p>The Hydrogeological Impact Assessment, presented as Appendix 8.1 in Chapter 8 of the ES [APP-034] states '<i>Aircraft maintenance areas including those earmarked for aircraft breaking/recycling will be appropriately sized, using a lined (impermeable base) hardstanding and with a perimeter bund and contained drainage network. Areas designated for aircraft breakage/ recycling would be subject to the appropriate environmental permitting to be agreed with the EA</i>'.</p> <p>Within Table 10.15 of Chapter 10 of the ES [APP-034] the Receptor and effects includes; Soils - Pollution incidents resulting from spillage due to spillages of oils and other chemicals, which it assesses as 'not significant'.</p>
Thanet District Council	Cumulative impacts	"Appendices 18.1 and 18.2 appear to be missing from the submitted application so it is unclear which sites have been excluded from the cumulative assessment and the reasons for their exclusion. Therefore, a comparative exercise between the allocated sites in the Local Plan and the sites included in the cumulative assessment cannot be fully undertaken. However, a simple comparison between figures 18.1 and 18.2 and the draft Local Plan proposals map indicates that some allocations have not been included in the cumulative assessment. As stated, until appendices 18.1 and 18.2 have been made available, TDC is unable to assess the long list of sites."	They are indeed missing. They have been submitted at Deadline 4 as document TR020002/D4/5.2-13A

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Thanet District Council	Cumulative impacts	"The omission of the cumulative impacts of Manston Airport and Lydd Airport both operating together is of concern. For TDC, the issue relates to the proposed socioeconomic impacts of Manston Airport which could be comprised given that the effect of the Lydd Airport expansion has not been assessed."	Lydd Airport was not considered in the CIA in the ES [APP-034] as it falls outside of the screening criteria used to determine whether new or existing developments should be taken account of (refer to paragraph 18.4.3 and 18.4.13 of the ES [APP-034]). In this regard it is over 50km from the proposed development at Manston. In terms of the socio-economic impact the assumptions are contained within the Azimuth Report [APP-085] and therefore socio-economic impact assessment do not assume transfer of business from Lydd Airport and as such there is no reason to assume any cumulative socio-economic impact would occur.
Thanet District Council	Cumulative impacts	"TDC has provided a list of major planning applications that have been decided (Appendix 2: Major Planning Applications Decided Since March 2018) and major planning applications that are awaiting a decision (Appendix 3: Major Applications Awaiting Decision Since March 2018). The major planning applications are not included in the short listed sites that have been included in the Cumulative Assessment. There is the potential that one or more of this sites may affect the cumulative impact of the proposed development and the Applicant will need to determine whether these will need to be assessed."	The methodology for ascertaining the list of developments for inclusion within the assessment is outlined in paragraphs 18.4.3 and 18.4.13 of Chapter 18 of the ES [APP-034]. Certain developments are not considered in the cumulative impact assessment in the ES [APP-034] as they fall outside of the screening criteria used to determine whether new or existing developments should be taken account of (refer to paragraph 18.4.3 and 18.4.13).
Thanet District Council	Approval	"...TDC should be the approval body (in consultation with other bodies where relevant) rather than the Secretary of State in relation to the following Requirements: <ul style="list-style-type: none"> ● 3: Development masterplan ● 4: Detailed design ● 5: Detailed design of local fuel depot ● 8: Ecological mitigation ● 10: Landscaping details ● 11: Contaminated land ● 12: Protected species ● 13: Surface and foul water drainage ● 14: Traffic management ● 15: Piling ● 16: Archaeology 	The Secretary of State is expected be the approving body in consultation with TDC.
Thanet District Council	OEMP	"Requirement 7 for the provision of operation environmental management plan does not require the approval by the Secretary of State, relevant Local Planning Authority or other relevant consultees. As	The Secretary of State is expected to be the approving body in consultation with TDC.

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no Operation Environmental Management Plan (OEMP) has been submitted with the application it is expected that any OEMP, or part thereof, should need approval from the relevant body/authority, which in this case should be TDC.
If an OEMP was submitted it would be expected to be a certified document as set out in Schedule 10."

