



RiverOak Strategic Partners

Comments on Responses to First Written Questions

TR020002/FWQC

Examination Document

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

THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES 2010

RIVEROAK STRATEGIC PARTNERS

MANSTON AIRPORT DCO

PLANNING INSPECTORATE REFERENCE: TR020002

Applicant's Comments on Third Party Responses to the Examining Authority's

First round Written Questions Submitted for Deadline 4

8 March 2019

Manston Airport DCO – Comments on Third Party Responses to First Written Questions

Ref No.	Respondent	Question / Response	Applicant's Comments
G.1.1	Thanet District Council (TDC)	<p>Saved Policies of the Thanet Local Plan 2006</p> <p>Saved Policies EC2, EC3, EC4, EC5 and EC6 of the adopted Thanet Local Plan 2006 are all of particular relevance to the application.</p> <p>Explain if the application fully accords with these policies and what weight should be afforded to them.</p> <p>Thanet Local Plan Policies EC2, EC3, EC4, ECS and ECG were drafted to reflect the current operators of the site at that time. However the general tenets of Policy EC2 in relation to assessment of impacts from an operating airport is still applicable to the proposed development and these matters are considered in the Council's Local Impact Report.</p> <p>Policy EC3 of the Thanet Local Plan 2006 was not saved by Secretary of State direction in 2009 and therefore is not relevant to the application.</p> <p>It is unclear whether the application is consistent with adopted Policy EC4, which identifies an area specifically for airside development. It is not clear, at this stage, whether the development proposed for the Northern Grass area falls within this definition.</p> <p>The application is in broad conformity with Policy EC5.</p> <p>The application does not conflict with Policy EC6 as a policy allocation adjacent to the site.</p> <p>The draft Local Plan (Publication draft 2018), while leaving the way open for the DCO to be considered, does not specifically allocate the site for aviation development. However the Council to the adopted Local Plan policies EC2, EC4 and EC5 in assessing these proposals.</p>	<p>The application fully accords with, and full and significant weight should be attached to Policies EC2, EC4 and EC5 for the reasons set out below:</p> <p>Paragraphs 2.65 and 2.66 of the adopted Thanet Local Plan confirm that the policies relating to Kent International Airport were in fact drafted to adopt a cautious approach to planning for the consequences of airport development during the Plan period and not to reflect the operators of the site at the time. Paragraph 2.65 states that given the level of investment required to handle substantial numbers of passengers and freight, and the past history and length of time it has taken other UK airports to develop their throughput, that the Council took the position that it should plan for 1 million passengers, and 250,000 tonnes of freight per annum by the end of the Plan period (2011). However, given the fluidity of the market and the enormous potential that exists at Kent International Airport, the Council proposed to</p>

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			<p>formally review the situation during the years 2005- 2006 with a view to taking a revised position in respect of the development of the airport and, therefore, if necessary also to adjust the consequential decisions in respect of other land uses in a review of the Local Plan at the appropriate time. That review never took place. Paragraph 2.66 of the adopted Thanet Local Plan specifically states that the planned-for development levels are in no way intended to place a ceiling on the development of the airport and that the policies are not limited to a particular level of traffic. This paragraph continues to state that should national policy or market forces result in a more rapid development of the airport than currently envisaged, that the policies will remain applicable.</p> <p>It is RSP's view that the proposals fully accord with Policies EC2 (Kent International Airport) and EC4 (Airside Development Area) which remain up-to-date policies. Significant and full weight should therefore be attached to these policies. This was the conclusion of a Planning Inspector in March 2017 who considered four planning applications for the change of use of buildings at Manston Airport (see Appendix 4 of the RSP Planning Statement – document reference APP-080).</p> <p>Policy EC3 has not been saved. It is clear from the Proposals Map to the adopted Thanet Local Plan 2006 that the</p>

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			<p>entire Northern Grass area is covered by Policy EC4. Paragraph 2.74 of the adopted Thanet Local Plan confirms that “in order to provide for the operational development of the airport, land north of the runway, and including the land north of the B2050 [the Northern Grass], is reserved for airside development purposes. In this context, airside development is defined as uses with an operational requirement for direct access to aircraft and therefore dependent on a location immediately adjacent to the runway or capable of direct access to it via taxiways. This includes uses based on:</p> <ol style="list-style-type: none"> 1. Operation of passenger handling services 2. Air cargo operations related to the site 3. Operation of aircraft maintenance and manufacturing 4. Services ancillary to the maintenance and operation of the airport <p>Paragraph 2.75 specifically states that the Local Planning Authority will oppose any development or use of land in the defined area which does not specifically require an airside location. Appendix 4 to the RSP Updated NSIP Justification (document reference REP1-005) sets out exactly why the development proposed for the Northern Grass requires an airside location and therefore why the proposals are in accordance with this policy.</p>

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			<p>The proposals also fully accord with Policy EC5 (Land at, and East of, the Airport Terminal) which reserves land for airport terminal-related activities which paragraph 2.76 of the adopted Thanet Local Plan confirms includes car parking. The land reserved by Policy EC5 is identified for passenger parking in RSP's Masterplan (document reference APP-079).</p> <p>RSP agree with TDC that Policy EC6 (Fire Training School/MOD Complex) relates to a site which is not within the DCO Order Limits.</p>
G.1.4	TDC	<p>Thanet Local Plan</p> <p>TDC's Draft Local Plan to 2031 (dated 26 October 2018) states at paragraph 1.43, with reference to Manston Airport that:</p> <p><i>"...the site has an existing use for aviation, subject to other relevant legislation."</i></p> <p>Explain the inclusion of the phrase "<i>subject to other relevant legislation</i>".</p>	
G.1.5	TDC	<p>Thanet Local Plan</p>	<p>The phrase "subject to other legislation" recognises the fact that Airport operations are subject to other controls outside the local planning authority's remit (eg: CAA licencing).</p> <p>Noted.</p>

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		<p>TDC's Draft Local Plan to 2031 (dated 26 October 2018) states at paragraph 1.44 that:</p> <p><i>"If a DCO for aviation use at the site is granted, this would require a partial review of the Local Plan in relation to housing land supply provisions, aviation and environmental policies and other related matters."</i></p> <p>Explain the effect that the consenting of the DCO would have on the draft Local Plan's housing land supply and why a partial review would be required in this regard.</p>	
		<p>Thanet District Council has previously raised concerns about the potential housing impacts arising from the job figures stated in the application (relevant representation submitted to PINS in October 2018).</p> <p>The report submitted by the applicants (RPS "Employment and Housing Land Technical Report" March 2018 indicates (para 5.9) that no additional housing is required to support the new workforce up to 2031. However, this conclusion appears to be based on the capacity of housing sites submitted as part of the Strategic Housing Land Availability Assessment (SHLAA process, rather than sites actually allocated in the draft Local Plan (Table 4.4).</p> <p>This suggests that additional housing sites would need to be allocated for the period of the draft Local Plan to 2031, and therefore a review of the housing land position would be required if the DCO was granted.</p>	<p>If the DCO is consented, there will need to be a full economic assessment carried out by the Council as part of a Local Plan Review to understand the likely impacts on both housing and employment land supply. The RPS Employment and Housing Land Technical Report (EHLTR) includes an assessment which concludes that no additional housing is required to support the new workforce as Thanet residents are expected to fill the new jobs.</p> <p>The RPS EHLTR does not examine individual allocated housing sites – not does it need to. Instead it draws a general overall conclusion on housing land availability having regard to available published data set out in the SHLAAs prepared by the various Councils making up the adopted study area. This approach is explained in paragraphs 4.39 to 4.43 of the EHLTR (see Appendix 6 of the</p>

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			RPS Planning Statement – document reference APP-080).
G.1.6	TDC	TDC's Draft Local Plan to 2031 (dated 26 October 2018) allocates a site called Manston Green for 785 dwellings, which it states has planning permission. Some of the site falls within the DCO application boundary. Explain the effect that the consenting of the DCO would have on the delivery of the site.	
		The limits of the order would include an area specifically outside the approved housing parameter plan areas in the outline permission for Manston Green under reference OL/TH/14/0050. Whilst the DCO application boundary would incur within the Manston Green boundary, it would not physically prejudice the residential development coming forward. Thanet District Council considered the impact of aircraft noise from an operating airport on the Manston Green development during the course of the application, and the planning committee reports are provided at Appendix 1 and 2. The delivery of the site would be subject to market forces in the knowledge of what was considered in the planning application and any subsequent approved developments.	Noted.
G.1.7	The Applicant TDC	Thanet Local Plan TDC's Draft Local Plan to 2031 (dated 26 October 2018) allocates several housing sites in close proximity to the application site. What effect does this have on the application and what weight can be afforded to the proposed allocations at this time?	

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		<p>The housing site allocations in the draft Local Plan (at Ramsgate, Cliffsend and Minster) were originally allocated (2015 Draft Preferred Options Plan) when it was proposed that the Airport would continue to be operational.</p> <p>This was done on the basis that the allocations in question would not be adversely affected by, or unreasonably constrain, ongoing Airport operations, as envisaged by draft Policy SP05 (2015 Draft Plan).</p> <p>Many of the allocations in these locations have planning permission. The two key allocations where planning permission has not yet been granted are:</p> <ul style="list-style-type: none"> • Land at Tothill Street, Minster (draft Policy H012) - this site is currently the subject of a planning application, ref TH/18/1488; and • Land at Manston Court Road/Haine Road (draft Policy SP18) - part of this site (the eastern section) is currently the subject of a planning application, ref TH/18/0261. The western section of the site is allocated, but not yet the subject of a planning application. <p>In both cases, a number of comments were received at Publication stage (Reg 19) - 19 and 15 respectively. Therefore given housing site in close proximity have planning permission and the low number of comments on those allocated sites without permission, moderate weight can be applied to those allocated sites.</p>	<p>As noted in the Applicant's response to G.1.7 the Applicant does not agree that moderate weight should be afforded to the proposed allocations in the Local Plan until such time as it has been through the Local Plan examination process.</p>
G.1.9	The Applicant	<p>Stone Hill Park Ltd (RR-1601] planning application to TDC</p> <p>Manston Airport is being promoted for redevelopment for housing and mixed-use scheme.</p> <p>What is the current status of this proposal?</p>	

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	Stone Hill Park Ltd TDC		
	Stone Hill Park Ltd	No response received	N/A
	TDC	A hybrid planning application for comprehensive redevelopment of the site involving the demolition of existing buildings and structures and removal of hard standing and associated infrastructure, and provision of mixed use development comprising Employment (Use Classes Bla-c/B2/B8), Residential (Use Classes C3/C2), Retail (Use Classes A1-A5), Aviation (Sui Generis), Education and other non-residential institutions including museums (Use Class D1), Sport and Recreation (Use Class 02), Hotel (Use Class C1), Open space/landscaping (including outdoor sport/recreation facilities) was made valid by Thanet District Council on 9th May 2018 under reference OL/TH/18/0660. The application remains live and under consideration, with further information on highways and environmental matters and any potential revisions to parameter plans agreed to be submitted by the applicant. The determination period has currently been extended until 31st March 2019 pending the receipt of the additional information.	Noted. Please refer to the Applicant's response to G.1.9.
AQ.1.4	Natural England	Air quality impacts on designated ecological sites Paragraph 9.118 of the Planning Statement [APP-080] states:	

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		<p><i>"In terms of impacts on ecological sites, some exceedances of the annual mean NOx objective are predicted where major roads pass close to designated ecological sites, mainly because of levels of emissions from existing road traffic. The additional contribution from the Proposed Development, including airport-related traffic, is small, less than 7% of the objective at any major ecological site. The impact on air quality at local ecological sites is insignificant. Exceedances of the critical loads for nitrogen and acidity are predicted due to existing deposition rates, and the additional contribution from the Proposed Development is insignificant."</i></p> <p>Does NE agree that the air quality impacts on ecological sites are insignificant?</p>	
		<p>Natural England does not agree, at this stage, that the impact of annual mean NOx on ecological sites is insignificant. Detail on the reasons for this are set out in Section 3.4 of our Written Representation.</p>	<p>The SoCG with NE has been agreed and clarification on this point will be provided to NE in due course.</p>
AQ.1.5	<p>Natural England</p> <p>TDC</p>	<p>Scoping out SO2, CO and VOCs</p> <p>Table 6.2 of the ES [APP-033] scopes out the above compounds for the reasons given at paragraph 6.4.19 of the ES.</p> <p>Do NE and TDC agree with this scoping out?</p>	
	<p>Natural England</p>	<p>Whilst SO2 has been scoped out, sulphur impacts acidity, and this has been modelled. Therefore, Natural England agrees the correct compounds, which have an ecological effect, have been assessed. For further detail see section 3.4 of our Written Representation.</p>	<p>Noted.</p>
	<p>TDC</p>	<p>Thanet District Council agrees that sulphur dioxide and carbon monoxide can be screened out as described in paragraph 6.4.19 of the ES. Provided the impacts of nitrogen dioxide, PM10 and PM2.5 can be satisfactorily controlled, no impacts due</p>	<p>Noted.</p>

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		<p>to sulphur dioxide or carbon monoxide would be expected to occur. Emissions of volatile organic compounds (VOCs) are similarly unlikely to pose a risk of adverse impacts on health, but voes are a potential concern from the perspective of odour. The ES includes an assessment of odour including the potential contribution of voes (Appendix 6.4). On this basis, TDC agrees with the approach set out in Section 6.4.19 and Appendix 6.4.</p>	
AQ.1.5	TDC	<p>Additional monitoring</p> <p>Does TDC agree with the statement in paragraph 6.3.3 of the ES [APP-033] that no additional air quality monitoring was required?</p>	<p>Noted.</p>
AQ.1.6	CAA	<p>Table 6.2 [APP-033] Rejection of Aviation Environmental Design Tool (AEDT) and use of Atmospheric Dispersion Modelling System (ADMS) rather than ADMS Airport</p> <p>What is the CAA view on row 6 of Table 6.2 [APP-033] on the Applicant's rejection of AEDT?</p>	

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		<p>ADMS and ADMS-Airport are UK developed transport emission dispersion methods implemented in software, which were developed prior to any international guidance on the calculation of emissions concentrations from transport sources. They are therefore more familiar to UK users and likely more practical to apply to UK situations, as noted in the PSDH recommendations.</p> <p>ADMS Airport was specifically developed to address the aviation emissions from jet engines, in addition to road and rail emissions, and as noted in the PSDH Air Quality Modelling Review, was recommended for Heathrow emissions & dispersion modelling. In relation to ADMS vs ADMS-Airport, a consideration of this can be traced back to the PSDH air quality review (now archived by DfT), both ADMS, ADMS-Airport and AEDT (then EDMS) were compared in the PSDH Emissions Model Inter- Comparison study and the findings did confirm that ADMS over-estimated emissions concentrations and ADMS-Airport predicted lower concentrations, but closer to measured levels. See:</p> <p>https://webarchive.nationalarchives.gov.uk/20071209143920/http://www.dft.gov.uk/pgr/aviation/environmentalissues/heathrowsustainability/chapter4dispersionmodelling</p> <p>In the context of the above, it's worth bearing in mind that the ICAO guidance on aviation emission dispersion models is less prescriptive than for example, aircraft noise calculation models, and thus AEDT and ADMS Airport are both ICAO approved methods, amongst others.</p>	Noted.
AQ.1.9	Natural England	<p>Table 6.2 (APP-033] nonhuman receptors</p> <p>i. Are NE content that the Applicant's scope of non-human receptors considered in the air quality assessment considers the most sensitive habitats?</p>	

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		<p>ii. Has NE agreed the selection of non-human air quality receptors with the Applicant?</p> <p>i. Natural England has advised the Applicant that the air quality model should assess impacts on designated nature conservation sites (SSSIs) within 5km of the Order Limits, not 2km (as stated in paragraph 6.4.9 [APP-033])</p> <p>ii. Natural England provided this advice in a telephone conference on 1 February 2019.</p>	<p>The Applicant has been unable to find published guidance from Natural England advising a 5 km criterion for SSSIs. A reference would be useful for future assessments. However, for the present DCO application, we can confirm that all SSSIs within 5 km of the application boundary have been assessed.</p>
AQ.1.10	<p>Natural England</p> <p>The Applicant</p>	<p>Paragraph 6.4.4. (APP-033) Cartesian Grid for Air Quality</p> <p>This grid does not cover the full extent of the specific receptors.</p> <p>i. Can the Applicant list the specific receptors that are not covered?</p> <p>ii. Does NE regard the grid coverage to be sufficient to cover the locations where the impacts are expected to be greatest?</p>	<p>Noted.</p>
AQ.1.11	Natural England	Table 6.6 (APP-033)	

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	PHE TDC	Do NE, PHE and TDC have any comments on rationale for incorporation of the environmental mitigation measures proposed in Table 6.6 (APP-033)?	
	Natural England	Natural England has made detailed comments on the assessment of air quality impacts on ecological receptors in section 3.4 of our Written Representations. Until this assessment has been carried out satisfactorily, it is not possible to comment on suitable mitigation measures.	Noted.
	PHE	<p>We have reviewed the table and the supporting text and are satisfied with the identification of potential sources of air pollution and human health receptors. During the construction phase, control and mitigation measures will be embedded into the CEMP and DMP and we understand that further development of these plans will occur post granting of the DCO. Therefore, we recommend that the final plans are completed to the agreement of Thanet District Council who are responsible for the local air quality management.</p> <p>During the operational stage there many be opportunities for further mitigation such as the use of low emission fleet vehicles, encouragement of the use of sustainable transport modes for workers which could additionally be explored. Reducing public exposures to pollutants such as particulate matter and nitrogen dioxide, even when air quality standards are not exceeded, is expected to have public health benefits. We support approaches which minimise or mitigate public exposures to air pollutants, address inequalities (in exposure), and maximise co-benefits (such as physical exercise) and encourage their consideration during development design, environmental and health impacts assessment, and development consent.</p>	Noted.

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	TDC	No response see.	N/A
AQ.1.16	CAA	<p>Paragraph 6.1.15 of Appendix 6.3 [APP-044]</p> <p>i. Is detailed documentation on the Aviation Environmental Design Tool AEDT methodology available from the Federal Aviation Administration (FAA)?</p> <p>ii. What is the CAA view on the applicability of the recommendations of the PSDH to Manston?</p> <p>i) Para 6.1.15 is incorrect, technical documentation is published (and attached): https://aedt.faa.gov/documents/aedt_2d_techmanual.pdf</p> <p>Chapter 5 covers the emissions inventory (emissions sources) and Chapter 6 covers emissions dispersion.</p> <p>ii.) The PSDH air quality guidance, although instigated because of concerns around air quality of an expanded Heathrow, was in large part not Heathrow specific, and as noted by the applicant, much of the work fed into the ICAO Airport Air Quality Manual, Doc. 9889. For example, it provides guidance on model inputs in terms of the importance of background concentrations, meteorology and source apportionment. Although not expert in field, we conclude that the recommendations remain valid.</p>	Noted.
AQ.1.23	TDC	Air quality monitoring	

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	The Applicant	<p>The ES proposes to provide funding to TDC to reinstate air quality continuous monitoring at the ZH3 Thanet Airport location. This will monitor NO and NO2 at hourly intervals in real time.</p> <p>i. Does TDC consider that the proposed monitoring is sufficient for operational air quality emissions arising from the Proposed Development and is the approach agreed with the Applicant?</p> <p>ii. What remedial action does TDC consider should be undertaken in the event that emissions are worse than forecast due to the Proposed Development?</p> <p>iii. How is funding secured for the continuous monitoring?</p>	
		<p>i. Thanet District Council would like the airport air pollution monitoring station (ZH3) reinstated with continuous monitoring of nitrogen dioxide, fine particles (PM10 and PM2.5) and sulphur dioxide. The Council will also request ongoing support for passive monitoring using diffusion tubes at receptors close to the airport. Although the ES anticipates no exceedances of the air quality objectives it will assist the Council in fulfilling its Local Air Quality Management obligations under Environment Act to monitor and assess these key pollutants. In addition there will be annual costs associated with continuous monitoring, servicing and maintenance (officer time conducting calibrations), data management (QA/QC & ratification) and passive monitoring at receptors around the airport (diffusion tubes for nitrogen dioxide, BTX tubes - deployment/ collection and analysis). Sufficient funding should be provided by the applicant to cover both reinstatement and ongoing operational costs of the ZH3 monitoring station. Because the proposed development is forecast to have only a slight impact on air quality, further monitoring to that set out above would not be effective in enabling any impact of the airport on air quality to be identified. TDC therefore considers that the proposed reinstatement of monitoring station</p>	<p>The Applicant agrees in principal with these comments and will work with TDC to achieve formal commitments.</p>

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		<p>ZH3, supported by further passive monitoring using diffusion tubes, is sufficient.</p> <p>ii Assessment should be based on worst case and impacts considered at the application stage so any deterioration in air quality leading to an exceedance of health objectives is prevented. Thanet District Council will have no powers to require the operator to implement subsequent mitigation should unacceptable impacts occur and it would be extremely difficult for the local authority with limited resources to offset other sources of key pollutants to prevent an exceedance of the air quality objectives through the Local Air Quality Management (LAQM) process. This is why it is important for the application to comply with TDC's technical guidance on air quality, which requires air quality impacts in Air Quality Management Areas to be mitigated.</p> <p>iii. A basis for calculating an appropriate level of funding to offset the forecast impacts of the airport on air quality is set out in the ES Section 6.13. The council will seek a obligation through a Section 106 agreement under Section 174 of the Planning Act 2008 with the applicant for funding to be secured in perpetuity for the operation of the monitoring stations.</p>	
AQ.1.24	The Applicant TDC	<p>Government's Clean Air Strategy</p> <p>Are there any implications from the Government's new Clean Air Strategy (https://www.gov.uk/government/publications/clean-air-strategy-2019) for the Proposed Development?</p> <p>Section 5.7 of the Clean Air Strategy addresses aviation but does not have specific implications for this application. It may have strategic implications for airline and airport operations in the longer term. The implementation of Section 5.7 of the Clean</p>	<p>Agreed. Regarding the tightening of air quality standards, the focus currently is on PM_{2.5}, and we would note that Manston</p>

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		<p>Air Strategy would tend to result, if anything, in lower forecast impacts than those set out in the ES.</p> <p>On the other hand, adopting new, more demanding air quality standards (e.g. for PM2.5), as set out in the Clean Air Strategy Chapter 1, could potentially result in an increase in significance of the impacts of the proposed development on air quality. The applicant is best placed to comment on any implications of tightening standards for the application.</p>	<p>Airport would not be a major source of this pollutant: the airport contribution to annual mean PM_{2.5} is less than 0.5 µg m⁻³ at all receptors in Year 20.</p>
CA.1.13	TDC	<p>Reasonable Alternatives</p> <p>DCLG Guidance related to procedures for the compulsory acquisition of land (2013) advises at paragraph 8 that all reasonable alternatives to compulsory acquisition (including modifications to the scheme) should have been explored.</p> <p>Provide details of any previous initiatives to seek the Compulsory Purchase of this site, including any by River Oak Investments, setting out the reasons why these were not successful and whether there remains the possibility of using this route again.</p>	<p>Please refer to the Applicant's response to the ExA's FWQs CA.1.11 and CA.1.12</p>
		<p>The Thanet District Council Cabinet report from October 2015 with respect to the assessment of RiverOak as an indemnity partner is attached at Appendix 3. The conclusion of that report was: "Given the above, your legal advisors and officers are not satisfied at this moment in time that the information or assurances provided to date by RiverOak justify the Council deciding to make a CPO or as part of that process to support the appointment of RiverOak as the Council's indemnity partner in advance of deciding whether to make a CPO."</p> <p>The Thanet District Council Cabinet report from June 2016, relating to the soft-market testing process is attached at Appendix 4. The assessment of that soft</p>	

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		<p>market testing exercise concluded: "Based on the above assessment one can draw the conclusions that in terms of the key lines of enquiry, the market cannot deliver on the council's requirements; there is no established market which is able to deliver, or an adequate number of operators; the market has no capacity to deliver the requirements and there is no cost or other benefits in taking this matter further."</p> <p>Thanet District Council has no plans to support a CPO without a suitable indemnity partner.</p>	
CA.1.17	Stone Hill Park Ltd	<p>Acquiring by voluntary agreement</p> <p>DCLG <i>Guidance related to procedures for the compulsory acquisition of land</i> (2013) advises at paragraph 25 that, as a general rule, authority to acquire land compulsorily should only be sought as part of an order granting development consent if attempts to acquire by agreement fail.</p> <p>i. Set out the nature, timing and outcomes of any negotiations held with the Applicant and/or their agents in respect of the purchase of land and/or rights a) before 17 July 2018 and b) to date</p> <p>ii. Set out an evaluation of the current probability of acquiring land and/or rights by agreement.</p>	
CA.1.18	Stone Hill Park Ltd	<p>Acquisition by voluntary agreement</p> <p>Paragraph 8.37 of the Statement of Reasons [APP-012] states that:</p>	<p>No response seen.</p> <p>N/A</p>

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		<p>“Most of the land within the existing airport perimeter is owned by Stone Hill Park Limited, who have been unwilling to date to enter into meaningful negotiations with RiverOak, despite RiverOak’s attempts to acquire this land by agreement.”</p> <p>Comment on the Applicant’s assertion that Stone Hill Park Limited have been unwilling to date to enter into meaningful negotiations with RiverOak.</p>	
CA.1.23	Stone Hill Park Ltd	<p>Operation Stack</p> <p>The ExA notes that, at paragraph 12.18 of the Statement of Reasons [APP-012], the Applicant states, in relation to ‘Operation Stack’ that:</p> <p><i>“Following diligent inquiry RiverOak has received no evidence to suggest that any interest in land [by the Secretary of State for Transport] is still in being and there is no evidence that the Secretary of State for Transport is in occupation.”</i></p> <p>Set out the nature of any agreement with the Secretary of State for Transport in respect of Operation Stack and other relevant operations, including in your response any reference to s44 and/or 57 of PA2008 that may be relevant.</p>	N/A
CA.1.24	Secretary of State for Transport	<p>Book of Reference: Affected persons</p> <p>Set out a reasoned statement of your understanding of the position of the Secretary of State for Transport in relation to any interests that may be held under any of the Categories for any plot in the Book of Reference [APP-007].</p>	N/A

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		No response seen.	N/A
CA.1.25	The Highways Agency	<p>Book of Reference: Affected persons</p> <p>Set out a reasoned statement of your understanding of the position of the Highways Agency in relation to any interests that may be held under any of the Categories for any plot in the Book of Reference [APP-007].</p>	
		<p>Highways England has no interests in any plot currently in the Book of Reference. Highways England reserves its position in respect of any changes to the Book of Reference.</p>	Noted.
CA.1.42	<p>The Applicant</p> <p>KCC</p> <p>TDC</p> <p>Nemo Link Ltd</p> <p>Stone Hill Park Ltd</p>	<p>Special Category Land</p> <p>The ExA is minded to recommend that the circumstances set out in s131(4) or 132(4) related to replacement land; 131(5) or 132(5) relating to area, or use and necessity of replacement land; 131(4A) or 132(4A) relating to availability of replacement land and public interest for a speeded procedure; or 131(4B) or 132(4B) relating to acquisition for a temporary purpose do not apply in relation to plots 185b, 185c, 185d, 185f.</p> <p>Show any evidence to the contrary.</p>	
	KCC	KCC has no evidence to the contrary.	Noted.

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	TDC	Thanet District Council offers no evidence to the contrary.	Noted.
	Nemo Link Ltd	No response seen.	N/A
	Stone Hill Park Ltd	No response seen.	N/A
CA.1.43	KCC TDC Nemo Link Ltd Stone Hill Park Ltd and All parties	<p>Special Category Land</p> <p>PA2008 s132(3) states that this subsection applies if order land, when burdened with the order right, will be no less advantageous than it was before to the persons in whom it is vested, other persons, if any, entitled to rights of common or other rights, and the public.</p> <p>Set out your reasoned opinion as to whether this subsection is fulfilled in the case of the Special Category Land at plots 185b, 185c, 185d, 185f.</p>	
	KCC	The County Council has looked at the plan and, other than highway land and a public right of way, does not appear to have any land affected within the plan. The	Noted.

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		County Council agrees that that the land will be no less advantageous to landowners or the public, even if the applicant obtains a right over the land.	
	TDC	Thanet District Council considers that the Special Category Land at plots 185b, 185c, 185d, 185f will be no less advantageous to either the Council or the public, given that it will remain as public open space/cycleway available for use by the public and for maintenance by the Council where appropriate.	Noted.
	Nemo Link Ltd	No response seen.	N/A
	Stone Hill Park Ltd	No response seen.	N/A
DCO.1.2	Kent CC	<p>Article 12(2) – Temporary stopping up and restriction of use of streets</p> <p>Article 12(2) in the draft DCO [APP-006] states that:</p> <p><i>“...the undertaker may use any street temporarily stopped up or restricted under the powers conferred by this article and which is within the Order limits as a temporary working site...”</i></p> <p>Is KCC content with this Article?</p>	

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		<p>KCC is not content with the wording of Article 12(2). The County Council requests that the wording is altered to require the applicant to seek written consent from the Highway Authority to be able to use the highway as a temporary working site.</p> <p>The County Council notes that utility companies, as statutory undertakers, have a right to access and maintain any plant. The NRSWA 1991 Guidance on Measures necessary where apparatus is affected by Diversionary Works - A Code of Practice (appendix 1) states that when a highway, which is subject of a stopping up order, contains undertakers' apparatus, the Highway Authority should be aware of the undertaker's need for adequate access or protection and should discuss the intended closure at an early stage. The statutory undertaker should be consulted with and given an opportunity to divert any mains/plant.</p> <p>With regards to permissions for access, once a stopping up order has been raised then this is no longer public highway and therefore in theory, any utility will not need to request road space from KCC as Highway Authority in order to access their plant/apparatus. The wording should be altered to require the applicant to seek written consent from the Street Authority (i.e. the Highway Authority) to use the highway as a temporary working site.</p>	<p>The Applicant will consider the proposed amendments and, if thought appropriate, further amendments will be included in the next iteration of the DCO to be submitted at Deadline 5.</p>
DCO.1.4	Kent CC	<p>Requirement 16 – Archaeological remains</p> <p>The ExA notes that the Relevant Representation from Kent County Council [RR- 0975] states that:</p> <p><i>“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</i></p>	

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		<p><i>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 for future archaeological investigations."</i></p> <p>Suggest any amendment to Requirement 16 that would satisfy the County Council in these respects.</p> <p>NOTE: Kent CC may choose to answer this question in association with that at HE. 1.25.</p>	
		<p>To achieve the preservation in situ that may be required, KCC will need to have clarified that there is indeed flexibility within the parameters of development - for example, the quantum of development in the Northern Grass Area as was claimed in discussions, but not set out in the DCO. KCC can provide some wording into Requirement 16 that allows for preservation following evaluation of those areas but would need to be sure that this does not counter the principle of the permitted development and make the requirement unworkable. It would be best to agree this requirement with Historic England.</p>	<p>As noted in the Applicant's response to question HE.1.23 of the Examining Authority's first written questions, the Applicant is of the view that Requirement 16 allows for sufficient flexibility in the design and construction of the Northern Grass area to ensure that any unscheduled remains can be adequately investigated and protected.</p>
Ec.1.1	The Applicant Natural England	<p>Kent Wildlife Trust (KWT) [RR- 0978]</p> <p>KWT believe that the Noise Mitigation Plan [APP-009] does not consider in sufficient detail the impacts of specific flightpaths. KWT would hope to see a further examination on the predicted level of disturbance and pollution that will be caused by the airport proposal at sensitive nearby sites, such as Sandwich and Pegwell Bay.</p> <p>What is the view of the Applicant and Natural England?</p>	
		<p>Natural England agree with KWT that further examination is needed.</p>	<p>Further information on this matter in the form of Noise Contour Maps has been provided by</p>

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		<p>Noise impacts have not been assessed fully, and there is not enough information to confirm no adverse effects on integrity.</p> <p>Please refer to Natural England's Written Representation (dated 15/2/2019, Our Ref 267771) which provides more detail on this issue.</p>	<p>the Application at Deadline 4 [TR020002/D4/NCM].</p>
Ec.1.2	<p>The Applicant</p> <p>Natural England</p>	<p>KWT [RR-0978]</p> <p>KWT considers that the Environmental Statement [APP-033] needs to demonstrate that the measures to safely disperse birds and other wildlife from the runways without harm need to be further demonstrated, alongside a long-term conservation management plan that can demonstrate how consideration for wildlife can be accommodated alongside the specific requirements for commercial airport land use management.</p> <p>It is the view of KWT that these above matters have still not been adequately considered since the last iteration of statutory consultation, in particular with respect to Sandwich and Pegwell Bay.</p> <p>What is the view of the Applicant and Natural England?</p>	<p>Please refer to the Applicant response to Ec.1.2.</p>
Ec.1.3	<p>The Applicant</p>	<p>KWT [RR-0978]</p> <p>Kent Wildlife Trust have concerns over the methodology and detail of some of the species surveys undertaken:</p>	

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	Natural England	<p>Section 41 species:</p> <p>S41 species are the species found in England which were identified as requiring action under the UK BAP and which continue to be regarded as conservation priorities under the UK Post-2010 Biodiversity Framework.</p> <p>The S41 list is used to guide decision-makers such as public bodies, including local and regional authorities, in implementing their duty under section 40 of the Natural Environment and Rural Communities Act 2006, to have regard to the conservation of biodiversity in England, when carrying out their normal functions.</p> <p>KWT are concerned about the potential impact upon the Kent priority species brown hare. KWT would have expected to see further survey and detailed proposals to mitigate for this species.</p> <p>What is the view of the Applicant and Natural England?</p> <p>Invertebrate Survey:</p> <p>KWT believe the timing and survey effort for the invertebrate survey is suboptimal. Considering that the survey was made late in the season and under poor conditions for bees and wasps, and that few of the group, in terms of either species or individuals, were encountered, the number of scarce aculeates with restricted distribution is impressive and suggests that this group will prove of substantial interest.</p> <p>What is the view of the Applicant and Natural England?</p>	
		<p>Natural England defer to the Kent Wildlife Trust for specific views on potential impacts, as well as survey and mitigation requirements for the brown hare.</p> <p>Invertebrate Survey:</p>	<p>Brown hare records were reviewed during the desk study, the result of which are reported in Appendix 7.2 of the ES [APP-044] and the potential for the species to be present on site was identified, despite the nearest record being located 1.85 km from the site.</p>

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		<p>KWT believe the timing and survey effort for the invertebrate survey is suboptimal. Considering that the survey was made late in the season and under poor conditions for bees and wasps, and that few of the group, in terms of either species or individuals, were encountered, the number of scarce aculeates with restricted distribution is impressive and suggests that this group will prove of substantial interest.</p> <p>Natural England defer to the Kent Wildlife Trust for specific views on the invertebrate surveys carried out.</p>	<p>However, in Appendix 7.3 of the ES [APP-045], it is concluded in Table 7B.1 that brown hare will not be subject to significant effects due to environmental measures incorporated into or proposed to be implemented during construction and operation of the airport. Therefore, it was concluded that detailed surveys for brown hare were not required.</p> <p>It is recognised by the Applicant that a single visit in August does not represent a detailed survey of invertebrates. As a result, additional terrestrial invertebrate surveys will be undertaken, as detailed in paragraph 7.3.12, Chapter 7 of ES [APP-033 to APP-035] and the programme of outstanding surveys submitted at Deadline 1 [TR020002/D1/Cover].</p>
Ec.1.7	The Applicant Environment Agency (EA)	<p>NE [RR-1408] Surface water discharge</p> <p>The ES contains details of an outline drainage strategy (DS)[APP-033 and APP-045-048]. The intention at the operational stage is for all surface water to be treated on site and then discharged via an existing outfall into Pegwell Bay.</p> <p>Based on Figure 1.1 [APP-036] it is clear that the outfall lies within the boundary of a number of designated nature conservation sites. However, the Biodiversity chapter 7 [AP-033] is unclear exactly which designated sites and relevant interest features have the potential to be affected by the surface water outfall. References to 'the Pegwell Bay designated sites' are not sufficient.</p>	

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		<p>It is clear that the detailed design of the drainage strategy is not intended to come until after DCO consent at which point the Applicant 'may' need to apply for a new discharge permit from the Environment Agency (EA) (ES, Para 3.3.74 [APP-033]).</p> <p>However, Table 7.7 [APP-033] states on the same issue that 'Discharge from these ponds will be via a permitted discharge to Pegwell Bay.'</p> <p>Table 8.6 [APP-033] summarises the Applicant's discussions to date with the EA. The most recent position appears to be that as the discharge to the Pegwell Bay outfall would be of surface water it would not normally require a permit. Given that the DS is an outline, that there is apparent ambiguity over whether the surface water discharge during operation will be controlled by a permit and the current lack of clarity over the designated site interest features which could potentially be affected, Natural England considers it premature at this stage for the Applicant to conclude that there will be no significant impacts on internationally or nationally designated sites as a result of the surface water discharge.</p> <p>i. What is the view of the Applicant and the EA?</p> <p>ii. Provide the following:</p> <ul style="list-style-type: none"> • A clear list of the designated sites and relevant interest features which have the potential to be affected by the surface water outfall; and • A description of the type of habitat that surrounds the outfall. <p>iii. Confirm the likely nature, method and extent of works required to repair the damaged scour protection at the Pegwell Bay Outfall (ES Appendix 7.8 photographs in Appendix F)</p>	
		<p>i. We understand that the Applicant plans to discharge clean, uncontaminated effluent via a surface water outfall to Pegwell Bay. As such no permit or authorisation is required. Anything other than this will be classified as an incident and investigated, and if necessary enforcement action could be taken against the person/company responsible for the pollution it may cause.</p>	<p>Noted. Please refer to the Applicant's response to Ec.1.7.</p>

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		<p>Since the Environmental Permitting (England & Wales) Regulations 2016 (as amended) came into force a permit for surface water discharge is usually no longer issued because it should be clean and uncontaminated. We would only issue an Environmental Permit for surface water in exceptional circumstances.</p> <p>ii. This should be provided by the Applicant.</p> <p>iii. This should be provided by the Applicant. Given the outfalls proximity to designated sites, Natural England should be consulted on any works proposed.</p>	
Ec.1.8	Natural England	<p>ECJ Rulings on Mitigation in HRA Screening</p> <p>In April 2018, the European Court of Justice (ECJ) issued a decision in the case of <i>People Over Wind, Peter Sweetman v Coillte Teoranta (C-323/17)</i>. The ruling confirmed that proposed mitigation measures cannot be taken into account for the purposes of screening under the UK Habitats Regulations, which give effect to the EU Habitats Directive (92/43/EEC) [APP-044].</p> <p>Does Natural England (NE) have a view on the significance of these rulings for the Applicant's Report to Inform the Appropriate Assessment [APP-044]?</p>	<p>Noted.</p>
Ec.1.9		<p>Designated sites</p>	

Ref No.	Respondent	Question / Response	Applicant's Comments
	Natural England	<p>The Planning Statement [APP-080] states at paragraph 2.18:</p> <p><i>“There are no statutory environmental designations that apply within the DCO application site. However, the outfall corridor goes through/under the Sandwich Bay Special Area of Conservation (SAC) and its constituent Site of Special Scientific Interest (SSSI) (Sandwich Bay to Hacklinge Marshes). The outfall discharges into the Thanet Coast and Sandwich Bay Special Protection Area (SPA) and Ramsar site.”</i></p> <p>Does Natural England concur with the above statement?</p>	
		<p>Natural England notes that the first part of the statement is correct, i.e. that the outfall corridor goes through/under the Sandwich Bay Special Area of Conservation (SAC) and its constituent Site of Special Scientific Interest, Sandwich Bay to Hacklinge Marshes.</p> <p>However, as well as the Thanet Coast and Sandwich Bay SPA, the outfall also discharges into:</p> <ul style="list-style-type: none"> • Sandwich Bay to Hacklinge Marshes Site of Special Scientific Interest (SSSI) • Sandwich Bay Special Conservation Area (SAC) • Sandwich and Pegwell Bay National Nature Reserve (NNR) <p>Additional note: the outfall is:</p> <ul style="list-style-type: none"> • Around 200m from Thanet Coast Special Conservation Area (SAC) • Approximately 4,500 m away from the Thanet Coast Marine Conservation Zone (MCZ) 	Noted.

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E.1.8	<p>Natural England (NE)</p> <p>KCC</p> <p>Environment Agency (EA)</p> <p>Heritage England (HE)</p>	<p>Incomplete surveys</p> <p>Paragraph 5.4.17 of the ES [APP-033] states:</p> <p><i>“Although complete surveys have presently not been possible, sufficient information exists whereby the following has been applied. Where survey information is absent, a realistic worst-case approach has been adopted to what might be found had all the surveys been carried out, based on desktop surveys, analysis and site surveys undertaken. This is coupled with a commitment to carry out further surveys once access to land has been obtained, whether through voluntary agreement or compulsory access following the making of the application, or should the DCO be granted, access once ownership of the land has been obtained.”</i></p> <p>What limitations and uncertainty do NE, EA, KCC and HE believe these incomplete surveys introduce into the EIA?</p>	
	Historic England	<p><i>1.2. Archaeology</i></p> <p>1.2.1. Incomplete surveys mean that it is impossible to be sure about the presence/absence, character and heritage significance of archaeological remains. Therefore, an informed decision about whether the effect of the development on heritage assets is justified cannot be made. The EIA's "worst-case" assessment of effects assumes the presence of archaeological remains and that they have a high level of significance; however it makes no predictions about their location, extent, depth, robustness, or period/type, which would be important factors in deciding how they might be preserved by amending the design, and how residual impacts on them might be mitigated.</p> <p><i>1.3. Buildings</i></p>	<p>1.2 Archaeology</p> <p>A written scheme of archaeological investigation has been submitted at Deadline 4 [TR020002/D4/DWSI].which sets out detailed proposals for further archaeological work to support protection of archaeological remains to be secured as a requirement of the DCO. Detailed design of development within the Northern Grass will have regard to the results of this archaeological investigation.</p>

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		<p>1.3.1. Enough information is available to indicate that there are certainly some important historic buildings on the airfield. It is Historic England's view, on the basis of this information, that the T2 Hangar, WWII Dispersal Bay, RAF Manston Control Tower and the RAF Manston WWII Battle HQ are potentially nationally important and if so should be preserved. However, the relatively superficial survey on which the ES depends might prove to either underestimate or overestimate of the level of significance for each building so decisions about which buildings should be preserved may not be well-founded with the result that unjustified harm might be caused or unjustified constraints on development might be imposed. Additionally, the ES is not clear about the applicant's proposals for which buildings would be demolished or retained, so consideration of the likely impact of the development is made doubly difficult.</p> <p><i>1.4. Historic character</i></p> <p>1.4.1. The paucity of information available about the historic landscape character of the airfield makes it very difficult to judge whether the large change to landscape character that would be caused by the proposed development is justified. Historic England and the applicant disagree about the nature of this character and the level of heritage significance that should be assigned to it but there is no evidence to support either opinion. It is likely that the preservation of historic airfield character, the setting of historic buildings and key views could be achieved through change to the design but if so changes to the quantum and design may have to be considerable.</p>	<p>The draft DCO sets out clear and enforceable proposals for the protection of archaeological remains.</p> <p>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> <p>1.3 Buildings</p> <p>The former RAF Manston Control Tower, and RAF Battle Headquarters would be retained within the Museums area and the former ROC monitoring post would also be retained, along with the main runway.</p> <p>Initial appraisal of other historic buildings suggests that they represent standardised designs which have mostly been extensively modified since construction and are of limited architectural and historic interest. It does not appear likely that any of these buildings meet the tests set out in the HE Designation Guide to be considered for designation.</p>

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			<p>1.4 Historic Character</p> <p>The proposed development sets out a coherent response to historic character as set out in Chapter 9, paragraph 9.9.5 of the ES [APP-033 to APP-035]. These measures are in line with Historic England guidance on historic aviation sites. Measures to reflect the historic use and character of the airfield in detailed design are set out in the Design Guide submitted at Deadline 4 [TR020002/D4/DG].</p>
	Natural England	Natural England's view is that an appropriate worst-case approach has been taken regarding bats. Please refer to Natural England's Written Representation (dated 15/2/2019, Our Ref 267771) for more detail on this issue.	Noted.
	KCC	Incomplete archaeological surveys introduce an increased risk that important archaeology will be later found in the development site and that will not be able to be preserved within the agreed parameters of the development and its design. The significance and harm to the built heritage assets of the site is also not fully set out and addressed in the DCO submission and potentially development could result in the loss of important built heritage assets.	<p><u>Archaeology</u></p> <p>A written scheme of archaeological investigation has been submitted at Deadline 4 which sets out detailed proposals for further archaeological work to support protection of archaeological remains to be secured as a requirement of the DCO. Detailed design of development within the</p>

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			<p>Northern Grass will have regard to the results of this archaeological investigation.</p> <p>The draft DCO sets out clear and enforceable proposals for the protection of archaeological remains.</p> <p>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> <p><u>Buildings</u></p> <p>The former RAF Manston Control Tower, and RAF Battle Headquarters would be retained within the Museums area and the former ROC monitoring post would also be retained, along with the main runway.</p> <p>Initial appraisal of other historic buildings suggests that they represent standardised designs which have mostly been extensively modified since construction and are of limited architectural and historic interest. It does not appear likely that any of these buildings meet the tests set out in the HE</p>

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			Designation Guide to be considered for designation.
	Environment Agency	<p>Ecological Surveys</p> <p>As there are no biodiversity features of interest to us on the site or likely to be affected by the proposal, we have no comments to make with regards to ecological surveys.</p> <p>Ground investigation surveys</p> <p>Although no detailed ground investigation surveys have been undertaken we consider that this does not alter the core views indicated in the EIA. The Applicant has had access to detailed desk top studies, historical information and surveys, undertaken by third parties on various parts of the site, that are in the public domain. Taking a realistic worst case scenario based on the above has enabled an adequate assessment of likely ground conditions and potential requirements for any hotspot remediation works. Any uncertainty is within a scale which is manageable by standard approaches to land contamination and any required remediation works.</p>	Noted.
E.1.18	TDC	<p>Shortlist of projects for cumulative assessment</p> <p>Does TDC agree with the shortlist of projects considered in the cumulative effects assessment (APP-035)?</p> <p>If not please specify which other development TDC considers has the potential to give rise to significant cumulative effects that should be considered.</p>	

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		<p>The approach taken with regard to selecting the major sites for cumulative assessment is agreed and the zone of influence is generally agreed for the majority of topics in the ES but not all.</p> <p>Some of the allocations in the Draft Local Plan have not been included in the cumulative Assessment and the ES will need to be updated to reflect all of these.</p> <p>Appendices 18.1 and 18.2 have not been included in the submitted application so it is unclear which sites were initially included in the long list of sites and full comparison on cumulative sites is not possible.</p> <p>As stated in the UR, TDC expects Lydd Airport to be included in the cumulative assessment, particularly in relation to socio-economic impacts.</p>	<p>Agreed.</p> <p>The screening criteria used to determine reasonably foreseeable allocations is explained in Chapter 18 at paragraph 18.4.15 and Table 18.3 of the ES [APP-033 to APP-035].</p> <p>It has come to our attention that these appendices were omitted in error from the DCO submission of July 2018. For completeness both of these appendices have been submitted at Deadline 4.</p> <p>Lydd Airport was not considered in the CIA (Chapter 18) of the ES [APP-033 to APP-035] 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-033 to APP-035]). In this regard it is over 50km from the proposed development at Manston. In terms of the socio-economic</p>

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		<p>As part of the LIR, TDC has provided in Appendices 2 and 3 additional sites which the Applicant should consider in the cumulative assessment. TDC expects the Applicant to justify why these sites are included or not included in the cumulative assessment, or provide an update to the application as to the implications on the impacts from the proposed development taking account of these additional sites.</p>	<p>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>The screening criteria used to determine whether new or existing developments should be taken account of are found at paragraph 18.4.3-18.4.4 and 18.4.13 of the ES [APP-033 to APP-035]. All developments within 5km of the proposed development are assessed. It is considered that any cumulative effects from major developments beyond 5km of the proposed development application boundary would be limited to traffic and transport effects, and these are already accounted for in the air quality, noise and traffic and transport assessments presented in Chapters 6, 12 and 14 of the ES [APP-033 to APP-035].</p>
HE.1.5	The Applicant	<p>Heritage Action Zone</p> <p>The Heritage Action Zone in Ramsgate looks to achieve economic growth by using the historic environment as a catalyst.</p>	

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	Historic England	<p>What effect, if any do, you consider the scheme would have on aims of the Heritage Action Zone?</p> <p>We do not consider that the heritage significance of heritage assets in Ramsgate are likely to be harmed by operational aircraft noise. Furthermore, we do not think that the Heritage Action Zone Projects with which we are currently involved are likely to be undermined by such noise.</p>	Noted.
HE.1.22	Historic England TDC	<p>Non-designated assets within the airport</p> <p>Paragraph 5.192 of the NPS states that the Secretary of State will consider the impacts on non-designated heritage assets on the basis of clear evidence that the assets have a significance that merits consideration in that decision.</p> <p>What clear evidence is there that the non-designated heritage assets within the airfield have a significance that merits consideration in the decision?</p>	<p>The Northern Grass has been considered within the assessment as a worst-case within the stated parameters (Chapter 9, paragraphs 9.8.5 – 9.8.9 of the ES [APP-033 to APP-035]). Proposals for further archaeological investigation to allow for the identification and recording or avoidance of significant archaeological remains has been set out in Chapter 9, paragraphs 9.8.11 – 9.8.16 of the ES [APP-033 to APP-035].</p>
	Historic England	<p>In the central and southern parts of the airport (south of Manston Road) archaeological survey and evaluation excavation has been undertaken and the results published, which we understand provides a useful indication of the likely heritage significance of buried archaeological remains there (although it did not cover all areas that would be impacted by the present DCO proposals).</p> <p>Unfortunately, in the Northern Grass Area little archaeological survey and evaluation has been done, and that which has been done is apparently not available to us or the applicant. However, we believe that the airport lies within a very rich archaeological landscape in which numerous designated and non-designated archaeological sites of national importance have been identified and it is highly likely that archaeological remains of similar type and significance will also be found within</p>	

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		<p>the airport itself. Therefore, while there is little clear evidence yet for archaeological remains that have significance that merits consideration in the decision we think that this is likely to change following further survey and assessment.</p> <p>The airfield is known to contain important historic buildings dating from its wartime use as an airfield but the actual level of significance of these buildings cannot properly be confirmed without historic recording and analysis. Therefore, there is some clear evidence that historic buildings have significance that merits consideration in the decision and further survey might produce more.</p> <p>We believe that the historic landscape character of the airfield, which enables understanding and appreciation of its wartime use, has some heritage significance. The open grassland of the airfield is also the setting for, and contributes to the heritage significance of, the wartime buildings. However, no survey or assessment of the historic character has been undertaken so there is no clear evidence yet that historic landscape character has a significance that merits consideration in the decision but further survey might produce some.</p>	<p>The former RAF Battle Headquarters and control tower, along with the former ROC monitoring post and the main runway, would be retained within a safeguarding area or elsewhere on the airport site. While it is not clear that these could be of sufficient architectural or historic interest to merit designation, they do represent the most significant built heritage assets within the site.</p> <p>The proposed development sets out a coherent response to historic character as set out in the ES [APP-033 to APP-035], chapter 9, paragraph 9.9.5. These measures are in line with Historic England guidance on historic aviation sites. Measures to reflect the historic use and character of the airfield in detailed design are set out in the Design Guide submitted at Deadline 4 [TR020002/D4/DG].</p>
	TDC	<p>The ES makes clear that the Northern Grass Area (NGA) has been excluded from assessment as access was not obtained to undertake further intrusive investigations. The ES states that over 800 previously identified non-designated archaeological features within the site and the 1km study area and therefore, it can be expected that there may be a similar extent of significant archaeological remains in the NGA which merits consideration in the decision.</p>	<p>The Northern Grass has been considered within the assessment as a worst-case within the stated parameters [APP-033 to APP-035], paragraphs 9.8.5 – 9.8.9). Proposals for further archaeological investigation to allow for the identification and recording or avoidance of significant archaeological</p>

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			remains have been set out [APP-033 to APP-035], in paragraphs 9.8.11 – 9.8.16).
LV.1.3	TDC	<p>Landscape and Visual Impact - Thanet Local Plan</p> <p>Table 11.1 in Chapter 11 Landscape and Visual, in Environmental Statement Volume 2 [APP-034] quotes relevant policies from the Thanet Local Plan(2006) Saved policies.</p> <p>State the effects that the new deposited local plan policies would have in this respect.</p> <p>Adopted plan policies are CCI - Development in the Countryside now replaced by draft policy SP21, and CC2 - Landscape Character Areas now replaced by draft policy SP23.</p> <p>Whilst the Council supports the use of the 2017 Thanet Landscape Character Assessment as the most up to date study, the application of policy SP23 in the draft local plan (2018) should also have been assessed as it is this policy to which the landscape character assessment relates and seeks to implement. As part of this implementation, it is the council's intention to adopt the Landscape Character Assessment 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 document APP-034 Environmental Statement Volume 2 - Landscape and Visual refers to the key characteristics of each of 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 APP-034 does not address the Guidelines set out the Council's document for each of the LCA's in relation to the proposal. The draft policy SP23 states that development proposals " ... should demonstrate how they respect and respond to the character, key</p>	<p>At the time of preparing the LVIA in the ES [APP-034], the draft local plan (2018) had not been published and the requirements of draft Policy SP23 were not known.</p> <p>The Sensitivity Assessment contained within Appendix 11.2 of the ES [APP-033 to APP0-35] sets out a comprehensive assessment of the value and susceptibility to change of each LCA in accordance with the <i>Guidelines for Landscape and Visual Impact Assessment, Third Edition</i> (LI & IEMA, 2013). This provides an overall sensitivity to the type of development proposed rather than just an inherent landscape sensitivity. Whilst it 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</p>

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		<p>sensitivities, qualities and guidelines of the relevant landscape character areas, as detailed in the Landscape Character Assessment (LCA) ... "</p> <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 APP-034 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.</p> <p>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. Policy CC2 part (4) "On the central chalk plateau, a number of sites are identified for various development purposes. Where development is permitted by other policies in this plan, particular care should be taken to avoid the skyline intrusion and the loss or interruption of long views of the coast and the sea"</p> <p>Policy SP23 "All development should seek to avoid skyline intrusion and the loss of interruption of long views of the coast and sea, and proposals should demonstrate how the development will take advantage of and engage with these views."</p> <p>The draft policy also addresses the impact of views from other landscape character areas towards the plateau. The policy states:</p> <p>"Development proposals should demonstrate how their location, scale, design and materials will conserve and enhance Thanet's local distinctiveness, in particular:</p> <p>5. Long-distance, open views, particularly across the Dover Strait and English Channel, North Sea and across adjacent lowland landscapes; and</p>	<p>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> <p>Whilst the guidelines and key sensitivities of key LCA have not been specifically referenced in either Appendix 11.2 or the LVIA [APP-034], the assessment nevertheless provides full consideration of the effects on landscape character and on the views available as set out in the viewpoint assessment in Appendix 11.3 of the ES [APP-033 to APP-035]. This includes consideration of how the development affects long distance open views including consideration of the degree of skyline intrusion that would be brought about by the proposed development particularly from the lower lying landscape to the south (LCA B1 and E1). It is therefore considered that the LVIA addresses the requirements of draft Policy SP23.</p> <p>A Design Guide has been submitted at Deadline 4 [TR020002/D4/DG] which provides further detail on the design response to the local landscape character.</p>

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		<p>6. Subtle skylines and ridges which are prominent from lower lying landscape both within and beyond the District. "</p> <p>LCA's that are particularly affected by long distance views to, from and across the LCA towards the chalk plateau are: 81: Wantsum North Slopes El Stour Marsh, E2 Wade Marshes. In addition long distance views to the coast and seascape and landmark features together with avoiding new large vertical reflective development are also important in LCAs CI St Nicholas at Wade Undulating Chalk Farmland and C2: Central Thanet Undulating Chalk Farmland</p>	
ND.1.1	The Applicant CAA	<p>Planning Statement (APP-080)</p> <p>Paragraph 5.18 of the Planning Statement [APP-080] states, in relation to the question of whether or not the Aviation Policy Framework is out of date, the Applicant's view that this is the case on matters relating to airport expansion:</p> <p><i>"...since the conclusions of the Airports Commission's brief (July 2015) to find an effective and deliverable solution to increase aviation capacity in the South East as well as supporting the UK."</i></p> <p>In what way, if at all, did Manston Airport feature in the Airports Commission deliberations on aviation capacity in the South East?</p>	<p>Noted.</p>

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		<p>The CAA also notes reference to Manston on page 15 of Appendix 2 to the Airports Commission's Interim Report dated December 2013 (attached).</p> <p>Further information may be available in the Airports Commission's published documents on the national archives or the Department for Transport's website.</p>	
ND.1.29	TDC	<p>The RR from Pinsent Masons LLP on behalf of Stone Hill Park Ltd [RR-1601] states that TDC previously sought to explore whether airports operations at the site would be viable but could not find suitable partners to carry out such operations.</p> <p>i. What is your view on this statement; and</p> <p>ii. has anything changed in this respect since October 2015?</p>	
Ns.1.11	<p>The Applicant</p> <p>CAA</p>	<p>Paragraph 12.2.2 of ES (APP-034) Responses to Scoping Report (APP-043)</p> <p>Paragraph 12.2.2 of the ES lists CAA as a respondent to the Scoping Report consultation. Table A12.1.1 [APP-057] and Table 4.3 [APP-043] do not record the CAA response.</p> <p>Can the Applicant point to where in its application documents the CAA's response can be found?</p>	<p>Noted.</p> <p>N/A</p>
		<p>The CAA understands that the applicant is going to respond to this question and on that basis the CAA has not provided a response.</p>	

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Ns.1.14	The Applicant CAA	<p>Noise modelling</p> <p>Paragraph 9.86 of the Planning Statement [APP-080] states:</p> <p><i>“The noise assessment has been prepared without exact details relating to airspace options¹, operating principles and aircraft flight paths. These will be formalised through an Airspace Change Proposal (ACP) which is a separate consenting regime that will happen after any DCO is granted for the Proposed Development. The ACP will be submitted through the Civil Aviation Authority’s (CAA) airspace change process and the potential noise effects will be assessed again at that time following the CAA guidance within the Civil Aviation Publications (CAP). The ACP will therefore provide opportunities for communities to engage on future airspace options through an extensive consultation process as well as the preparation of a separate Environmental Statement to accompany the ACP.”</i></p> <p>Could any Airspace Change Proposal (ACP) give rise to a scenario which has not been assessed in the Applicant’s ES [APP-033 to 036]?</p>	
		<p>Given the nature of the CAP1616 process the applicant can only undertake a noise assessment without the exact details relating to airspace options. CAP1616 is a transparent and detailed process whereby all possible options should be considered and evaluated against the airspace change design principles. Design principles can only be set through a two-way process with stakeholders, which may include the local community. Given the level of engagement and consultation required throughout the process, it would be premature to make any assessment as to whether any other scenario not assessed by the applicant in its noise assessment could possibly reach the stage where it would be genuinely proposed as a final option to the CAA.</p>	Noted.

¹ ExA emphasis

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Ns.1.19	The CAA	<p>Noise methodology</p> <p>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"> • Application of professional judgement used to determine the likely equipment, working methods and times during construction; • 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 largest increase in ATMs is likely to be during the winter months. The CAA CAP1616a document states that an average summer's day should be used as the basis for assessments of noise. <p>i. Does the CAA consider that the assessment of average winter's day aircraft noise is representative of the proposed airport operations?</p> <p>ii. Is an average summer's day assessment also required?</p>	<p>In Chapter 12 of the ES [APP-034] we noted that CAP1616a recommends the use of the 92-day summer average in noise assessments. This is appropriate for most airports because the air traffic is most intensive at this time of the year. At Manston it is expected that air traffic will be more intensive in the winter period hence the</p>
		<p>CAP1616 and its technical annex CAP1616a provide guidance on the airspace change process. One aspect that the guidance seeks to ensure is that sponsors adequately explain how communities will be affected as a result of the proposal, such as the expected change in noise exposure communities will experience. If it is the case that the most adverse effects will be experienced in the winter months, then it is open to a sponsor to explain to the CAA why this is the most appropriate methodology to present to stakeholders and the CAA, and the CAA will consider this.</p>	

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			winter period will represent the highest noise exposure to communities.
Ns.1.24	The Applicant CAA Independent Commission on Civil Aviation Noise (ICCAN)	<p>Airspace Change Process [APP-086]</p> <p>ES Appendix 12.3[APP-057] discusses the potential noise effects relating to different aircraft flightpaths and selects a probable route that has been subject to assessment. The ES [APP-034] acknowledges that the flight path may be subject to change since it is subject to approval through the Airspace Change Process.</p> <p>i. Can the Applicant provide commentary on any progress made in relation to the airspace change process and the confirmation of specific flight paths for Manston Airport?</p> <p>ii. The Airspace Change Process is discussed in Section 6 of [APP-086]. What is the Applicant's understanding of the role of ICCAN in this process?</p>	
	CAA	<p>The applicant has submitted a Statement of Need in accordance with stage 1A of the airspace change process. The CAA would not expect detailed flight path options to be available before consultation and consideration of consultation responses is undertaken by the Sponsor. This is forecast to occur between about 60-70 weeks from commencement of the process at stage 1A if no delays are experienced. ICCAN's role in the airspace change process is set out at page 20 of CAP 1616. A link to the CAP 1616 process is below and p.20 is attached.</p> <p>https://publicapps.caa.co.uk/modalapplication.aspx?appid=11&mode=detail&id=8127</p>	Noted.

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	ICCAN	No response received	N/A
Ns.1.33	The Applicant CAA	<p>ES Noise contour maps (APP-042)</p> <p>Section 15 of the noise management plan [APP-009] states that the LAeq,16hr and LAeq,8hr are based on the average summer's day/night respectively.</p> <p>ES paragraph 12.7.44 [APP-034] makes it clear that the worst case is considered to be a typical busy day during winter time.</p> <p>Can the Applicant confirm:</p> <p>i. Whether the ES noise contour maps are based on the winter or summer day; and</p> <p>ii. whether the Category 3 interests have been identified based on the average summer's day or average winter's day scenarios?</p>	<p>This appears to be a question for the applicant rather than the CAA so on that basis the CAA has not provided a response.</p> <p>Noted. Please refer to the Applicant's response to Ns.1.33.</p>
OP.1.3	The Applicant Civil Aviation Authority (CAA)	<p>Aerodrome certificate</p> <p>Box 1.1 of the Environment Statement [APP-033] states:</p> <p><i>"The CAA is the statutory corporation which oversees and regulates, either directly or indirectly, all aspects of civil aviation in the UK; it is a public corporation of the DfT. Any airport in the UK which is used for commercial passenger flights, public transport flights and/or flying training in aircraft above a specified weight, is required to obtain, from the CAA, an Aerodrome Licence.</i></p>	

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	European Aviation Safety Agency (EASA)	<p><i>The EASA is an agency of the European Union (EU) with regulatory and executive tasks in the area of civilian aviation safety. Representatives from the member states national aviation authorities, such as the CAA, sit on the EASA's advisory bodies. From 31 December 2017 aerodromes in the UK which are open to public use and which serve commercial air transport, where operations using instrument approach or departure procedures are provided, and which have a paved runway of 800m or above, or exclusively serve helicopters, are required to comply with EASA regulations and obtain an EASA Certificate to replace their CAA Aerodrome Licence.</i></p> <p>Paragraph 4.8 of the Consultation Report [APP-075] dated July 2018 states:</p> <p><i>"The process of obtaining these consents will run alongside the DCO application process and a decision on them will be made by the CAA rather than the Secretary of State."</i></p> <p>What is the current status of this parallel application?</p>	
	CAA	<p>UK Aerodromes which fall within the scope of EASA will be subject to regulations set by the EU/EASA. The applicant's proposals for the aerodrome appear to fall within this scope. An application to the CAA for an EASA aerodrome certificate will need to demonstrate compliance with a range of regulatory requirements including the EASA Basic Regulation, the Aerodrome Implementing Rule and certification specifications. These are supplemented by non-binding Acceptable Means of Compliance and Guidance Material for Aerodrome Design. The process for obtaining an aerodrome certificate has not, as yet, been formally initiated by the applicant although informal engagement has taken place between the applicant and the CAA to discuss the applicant's proposals. It is usual for an application to develop on an iterative basis in discussion with the CAA prior to formal submission.</p>	Noted
	EASA	No response received	N/A

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OP.1.5	The CAA	<p>Prototype routes</p> <p>Paragraph 9.89 of the Planning Statement [APP-080] states:</p> <p><i>“Prototype routes have been used for the assessment of aircraft noise, which have been developed around design principles, namely ‘avoid overflying populations’, ‘overfly populations’ and ‘swathe centre line’. An options appraisal of these principles is presented in Appendix 12.3 of Chapter 12 of the ES [document reference TR020002/APP/5.2-12] 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. This process is both normal and unavoidable due to the separate consenting regimes. The assessment is therefore robust because it has considered the range of design outcomes which could occur following the completion of the ACP.”</i></p> <p>i. What is the view of the CAA of the <1% calculation?</p> <p>ii. Does the CAA agree that the ES [APP-034] has considered the range of design outcomes that will be part of a future ACP application?</p> <p>iii. In CAA’s experience, is it always necessary to seek an ACP following a planning consent application?</p>	
		<p>i)& ii) As noted above, the nature of the development of design principles is one that requires engagement with stakeholders. The CAA cannot prejudge the extent to which the applicant’s design principles will accord with those developed through the CAP1616 process and the options that it develops.</p> <p>iii) In accordance with The Civil Aviation Authority (Air Navigation) Directions 2017, the CAA must decide whether to approve a permanent change to airspace design. Given the regulatory obligations on the CAA, any permanent change to airspace design must be approved through the CAP1616 ACP process. However, that</p>	Noted

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		<p>process is capable of being scaled in accordance with the nature of the change proposed. The existence of planning consent is, generally, not a consideration in determining whether an ACP is required or not.</p>	
SE.1.4	TDC	<p>Thanet Local Plan</p> <p>TDC's Draft Local Plan to 2031 (dated 26 October 2018) states at Policy SP02 that:</p> <p><i>"Manston Business Park is the key location for advanced manufacturing and large scale job creating development."</i></p> <p>Explain the effect that the consenting of the DCO could have on the attraction of advanced manufacturing and large scale job creating development.</p>	<p>All assumptions relating to job creation are described in the Azimuth Report.</p>
		<p>Consenting the DCO could have a range of effects depending on the type of advanced manufacturing and job creating development. If the manufacturing requires close proximity to an airport, or is a noisy use, then it may be attractive to new employers or at least have a neutral effect. However, some forms of advanced manufacturing may be more susceptible to aircraft noise or airborne pollution, particularly those located at or considering locating at Manston Business Park. It is therefore difficult to definitively state whether the effect of an airport use on MBP would be positive or negative.</p> <p>One of the transformational initiatives put forward in the Thanet Economic Growth Strategy 2016 is investing in high value manufacturing and engineering across Thanet and East Kent. It says that securing the future of this advanced manufacturing and engineering will require a consideration of:</p> <ul style="list-style-type: none"> • essential up-front infrastructure; 	

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		<ul style="list-style-type: none"> • links to higher education and further education to ensure appropriate STEM skills provision; • the development of supply chains; • joint networking of opportunities between Thanet sites and Discovery Park due to the number of firms locating there and thriving; and • collaborating with relevant partners and stakeholders (including Locate in Kent for promotion and marketing and the South East LEP whose priority sectors include advanced manufacturing). <p>The list suggests that there are a number of potential drivers influencing the attraction of advanced manufacturing development and the consenting of the DCO alone may not have a significant impact.</p> <p>If the Northern Grass area accommodates employment-generating commercial development then this could be in direct competition with Manston Business Park.</p>	
Tr.1.5	The Applicant KCC	<p>The ES Volume 15 Part 1 [APP-060] Para 3.2.1 notes that “<i>At the time of the preparation of this TA, a formal request to use the model has been made, and a detailed scoping methodology is soon to be provided to KCC. However, the model was not ready to use before the submission of this DCO application.</i>”</p> <p>i. Is the model yet ready and, if so, will it be used in the production of further traffic analysis?</p> <p>ii. When would this further work be made available to the ExA?</p> <p>iii. Please confirm what the impact of the modelling work is on the ES traffic and transport assessment and linked assessments such as air quality and noise.</p>	

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		<p>The County Council, as Local Highway Authority, considers that it would be useful at this point to clarify the chain of events leading to the statement within ES Volume 15 Part 1. KCC currently feels that this element in the ES is partly misleading.</p> <p>Throughout the pre-application process, the applicant had stated to the County Council their intention to utilise the Thanet Strategic Highway Model (KCCSHM) to assess their development proposal with respect to highway matters. This extends back to pre-application discussions that took place on in August 2017, leading up to 21 December 2017 (which was the final correspondence that KCC received from the applicant's consultants prior to the formal submission of the subsequently withdrawn version of the DCO). During this time, the KCCSHM was unavailable for use as it was being refined in order to inform the emerging Thanet Local Plan, however the applicant was informed by the Highway Authority that the KCCSHM would likely to be available from January 2018 onwards.</p> <p>Following consideration of the Thanet Local Plan in January 2018, there was a period of almost four months between an initial expression of interest from the applicant for access to the KCCSHM and the submission of the DCO. This provided an opportunity for the applicant to instruct the Highway Authority to commission the necessary modelling work prior to submission of the DCO, however no further contact was received from the applicant during this period.</p> <p>In the absence of an agreed future position regarding the Thanet Local Plan, the Highway Authority encouraged the applicant to engage with the Local Planning Authority to agree an appropriate future land use scenario in relation to the DCO application, however to KCC's knowledge, very limited/no dialogue was progressed.</p> <p>Following this, it was concluded by the applicant that the timeline of model availability did not align with its deadline for DCO submission. It is the opinion of the</p>	<p>Since the submission of the DCO application significant progress has been made in negotiations with KCC in relation to the use of the strategic transport model and KCC's own transport strategy.</p> <p>In this regard 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>

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		<p>Highway Authority that simply because the appropriate tool for assessing the impact of the development proposal is unavailable for a specified period, does not automatically render an alternative approach (in this case the method utilised within the current ES Volume 15) as acceptable or appropriate.</p> <p>It is the opinion of the Highway Authority that the submission of the DCO application should have been delayed until the appropriate highway assessment tools were available, to avoid a situation where alternative highway impact assessments and mitigation strategies were a requirement post submission or during the formal examination.</p> <p>The Highway Authority can confirm that a formal instruction to commission Strategic Modelling services was received from the applicant on the 25 October 2018. This was then followed by a further request for additional modelling services towards the end of November 2018. All relevant outputs from the KCCSHM were completed by the Highway Authority (through their appointed transport consultants) to the satisfaction of the applicant in December 2018.</p> <p>The purpose of the KCCSHM is to provide a robust set of traffic forecasts to inform more detailed individual junction modelling assessment (to be undertaken by the applicant). This would then provide the necessary traffic impact data to inform an appropriate highway mitigation strategy in line with the submitted Thanet Local Plan. It is important to highlight that the modelling undertaken (under the instruction of the applicant) assumes that the development which is subject to the DCO has no material impact on local housing needs/projections. Please note that this does not mean that KCC endorses or opposes that assertion at this stage.</p> <p>The modelling outputs from the KCCSHM suggest that there is some material disparity between the traffic conditions that were forecast within the current</p>	

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		<p>Transport Assessment (forming part of the ES). Some of these disparities are outlined within the KCC Local Impact Report.</p> <p>To date, the Highway Authority has not been informed by the applicant of when further detailed junction modelling assessments will be completed or submitted for comment. Moreover, it is unclear which format this information will be submitted in.</p> <p>The disparity in traffic flows identified between the KCCSHM and the spreadsheet modelling submitted to inform the current Transport Assessment has the potential to instigate a change to the scope of highway junction assessment and the form of mitigation required at individual junctions/links. Therefore, this supports the assertions made by the Highway Authority in relation to the need for KCCSHM to be used to provide robust and appropriate traffic data to reach an informed position on appropriate highway mitigation strategy.</p>	
Tr.1.6	KCC	<p>The ES Volume 15 Part 1 [APP-060] Para 3.2.3 asserts that “<i>Spreadsheet modelling is an acceptable approach and the methodology is set out in this TA.</i>”</p> <p>This assertion needs to be justified.</p> <p>Does KCC agree with it?</p>	<p>The trip assignment approach adopted is an industry standard approach to identifying traffic routeing. It is acknowledged that it is not a dynamic tool which reflects traffic conditions.</p>

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		<p>enable a consistent approach to highway mitigation to be considered within the district.</p> <p>It is evident that the development trip assignment methodology that has been used to inform the submitted Transport Assessment (which includes the “Spreadsheet modelling” approach) is principally based upon the Google real-time online journey planner tool. This method is sometimes employed by transport professionals to assess likely vehicle routing in the absence of more locally specific modelling tools. However, this approach is not capable of reflecting the considerable changes in trip assignment arising from future development, traffic growth and associated transport mitigation measures. It simply assesses the existing road conditions and associated journey times to identify a quickest route for trips from expected origin to destination.</p> <p>The KCCSHM is dynamic in the way that it assesses traffic distribution/routing and will consider the impact of increased traffic volume to new and existing journeys on the local road network. It is also capable of forecasting the impact of new highway infrastructure such as new or improved road links or road closures.</p> <p>The submitted Thanet Local Plan growth includes plans for several new highway links and improvements in the locality, therefore the KCCSHM is considered to be the appropriate tool for assessing the future impact of the proposed development. This has been communicated to the applicant at various stages prior to the submission of the DCO.</p>	<p>As part of the revised Transport Assessment (to be submitted at Deadline 5), using the KCCSHM, the development traffic has been assigned onto the road network based on the modelling assignment.</p>
Tr.1.13	TDC KCC	<p>Do TDC and KCC agree with the scope of cumulative projects considered in the transport assessment [Section 10, APP-061]?</p> <p>What information does KCC consider is available to assess the impact of a Thanet Parkway Station on 2039 traffic flows?</p>	

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	TDC	<p>TDC raise concerns that the scope of projects in Section 10.1 do not represent the full extent of highway improvements that are planned in line with the most recent revision of the Thanet Transport Strategy (which has been endorsed by both KCC & TDC). In particular, the following have been omitted:</p> <ul style="list-style-type: none"> • An additional new road link between Shottendane Road and Hartsdown Road through housing allocation (H02 - Land north and south of Shottendane Road, Margate) within the emerging Thanet Local Plan. • An additional road link between Shottendane Road and A28 Canterbury Road, through proposed strategic housing allocation SP15 - Westgate within the emerging Thanet Local Plan <p>A proposed one-way flow from 82050 Park Lane to A28 Canterbury Road has been incorrectly included as a committed road improvement. This is not committed, although it does still form part of</p> <p>the wider plans across the Local Plan period, but is dependent on the delivery of the other new road links in and around the Birchington locality.</p>	<p>The Thanet Transport Strategy has been produced in support of the draft Local Plan. The new proposed highway links are not committed schemes in terms of permissions or funding and are therefore aspirational. The Transport Assessment submitted in support of the DCO excluded these schemes and therefore considered the existing situation, and a worst-case scenario.</p> <p>In the post DCO submission period the Applicant has 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 • Agreement on the modelling of the Development traffic using the KCCSHM which models the Local Plan growth and the TTS interventions.

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			<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>A revised Transport Assessment and associated appendices documents, and Traffic and Transport Chapter which incorporates these changes will be provided by Deadline 5.</p>
	KCC	<p>a) The County Council considers that the scope of proposed improvements that have been included within Section 10.1 do not represent the full extent of highway improvements that are planned in line with the most recent revision of the Thanet Transport Strategy (this document has been both developed and endorsed by Kent County Council and Thanet District Council). Notable omissions are: -</p> <ul style="list-style-type: none"> • An additional new road link between Shottendane Road and Hartsdown Road, through housing allocation (H02 - Land north and south of Shottendane Road, Margate within the emerging Thanet Local Plan). • An additional road link between Shottendane Road and The A28 Canterbury Road, through the proposed strategic housing allocation (SP15 - Westgate within the emerging Thanet Local Plan). <p>The County Council also notes that committed / delivered road improvements incorrectly include the proposed one-way flow from B2050 Park Lane to A28 Canterbury Road. This is not a committed scheme; however, does still form part of the wider plans across the Local Plan period. The delivery of this mitigation is likely to be</p>	<p>a) As noted above, the proposed highway links included within the TTS are not committed schemes in terms of permissions or funding and are therefore aspirational. The Transport Assessment submitted in support of the DCO excluded these schemes and therefore considered the existing situation, and a worst-case scenario.</p> <p>In the post DCO submission period the Applicant has 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

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		<p>heavily dependent on the delivery of the other new road links in and around the locality of Birchington (such as the A28 to Acol Hill road link).</p> <p>The route analysis and traffic distribution for the sensitivity test included in Section 10, APP-061 is not considered to be reliable, as traffic distribution has been derived using assumptions on the level of traffic redistribution by the applicant's consultancy team, rather than being informed by the dynamic distribution of trips from the KCCSHM.</p> <p>The Highway Authority has appended a copy of the district infrastructure proposal plan to assist the Examiners in understanding how these improvements relate to the Manston Airport site and the strategic housing allocations which form part of the emerging Thanet Local Plan (appendix 3).</p> <p>b) The Transport Assessment for the proposed Thanet Parkway railway station has, to date, reviewed impacts on the highway network for opening year and year 10, which is 2031. No assessment has been carried out on 2039 flows and based on forecast car parking demand the station car park will need to have been extended to prevent a constraint on demand in that timeframe. However, the economic modelling for the station appraises demand over a much longer time period. It is possible for the applicant to commission the economic consultants to provide the spreadsheet model of demand for 2039 and for the transport consultants used on the Thanet Parkway transport assessment to assign that demand on the highway network to ensure a consistent approach. This could then be used in the DCO transport assessment.</p>	<p>(NGA) as identified in the TTS for the Manston Haine Link which is part of the Inner Circuit Route Improvement Strategy</p> <ul style="list-style-type: none"> • Agreement on the modelling of the Development traffic using the KCCSHM which 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>A revised Transport Assessment and associated appendices documents, and Traffic and Transport Chapter which incorporates these changes will be provided by Deadline 5.</p> <p>b) The proposed Thanet Parkway Railway Station would be used by Airport passengers and staff for rail services and not for parking. It is anticipated that an Airport shuttle bus service would run on a basis to meet trains arriving and departing at the station. This would not create a significant volume of traffic (up to 4 an hour) to warrant additional work.</p>

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Tr.1.18	KCC	<p>Provide a response to the way in which the Applicant has addressed your concerns and considerations as set out in the ES Volume 15 APP-060 Table 3.2 'KCC – January 2018 Section 42 Consultation Response'.</p> <p>NOTE: This question may be responded to through a SoCG or a LIR.</p> <p>Following the submission of the DCO, the applicant and the Local Highway Authority have been in regular dialogue in order to seek common ground in relation to matters surrounding trip methodology (which, given the relatively bespoke nature of the proposed development, would require a first principles approach to highway trip rate assessment). Following a process of extended dialogue, a mutually agreed trip methodology has now been agreed in principle and this had led to some changes to the traffic assumptions that currently underpin the Transport Assessment within Volume 15 of the ES.</p> <p>The agreed revisions to the trip methodology have informed the recently completed strategic modelling exercise using the KCCSHM (as outlined in Question Tr.1.5). However, to date, none this information has been formally submitted by the applicant as formal evidence/submissions to the examination, so at this time these issues remain unresolved.</p> <p>The issue pertaining to the absence of provision for a new highway route to and from Westwood (Haine Road) through the Northern Grass is still unresolved, however since the submission of the DCO, some positive steps have been progressed by the applicant to seek to allay concerns raised by KCC.</p> <p>In line with proposed policy as set out within the emerging Thanet Local Plan (Strategic Routes Policy SP47) and the Thanet Transport Strategy, it is expected that any development within the Northern Grass actively aligns with the strategy by</p>	<p>The Applicant agrees that a mutually acceptable trip methodology has been agreed which has resulted in the following changes: shared taxi was removed as part of the mode share mix; and arrival times for passengers have been revised so they are closer to the time of the flight departure.</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 will be submitted at Deadline 5.</p> <p>As described in the statement of need, the Northern Grass Area as it is aviation related</p>

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		<p>delivering on site road/footway/cycleway infrastructure to accommodate part of a proposed, link road between the A256 and the B2050 (including an appropriate form of junction onto the B2050). This would enable the Inner Circuit Route Improvement Strategy to be delivered in an economical way, by enabling large sections to be built out within the internal layout of development sites, rather than incurring avoidable unnecessary costs related to offsite works. This is likely to be the case on several Strategic Allocation sites within the emerging Thanet Local Plan such as Birchington, Westgate, Westwood (Nash Road and Manston Court Road).</p> <p>The applicant has expressed their requirement for the proposed road link to be realigned, to avoid the need for it delivered through the centre of the Northern Grass and as such, the current masterplan for the site does not propose to facilitate the continued development of this important highway route, which in turn could lead to a significant increase in the amount of off-site works required to deliver infrastructure and increased costs.</p> <p>The County Council, as Highway Authority, has requested a statement of justification/reasoning for this position (given that the indication from the applicant is that the Northern Grass is not intended to form part of airside development), however this has yet to be provided. In the absence of clear and compelling justification, the Highway Authority is of the opinion that the original alignment of the Manston Road to Haine Road link should be included as part of any internal masterplan for the Northern Grass and an agreed route corridor secured as part of any development proposal for this site. This will also facilitate delivery of infrastructure by the Highway Authority, should external funding for this infrastructure be obtained/awarded ahead of any built development within the site being delivered.</p> <p>It is relevant to note that the current owners of the site have previously expressed a willingness enter into necessary agreements with the Highway Authority to secure a</p>	<p>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 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 points which will serve the adjacent housing and museums as well as the Airport development.</p> <p>Stage 1 Road Safety Audits for improvements and access points will be provided as part of the revised Transport Assessment.</p> <p>Details of any emergency access points onto the existing highway network will be included as part of the revised Transport Assessment to be submitted at Deadline 5.</p>

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		<p>route across the Northern Grass in accordance with current feasibility designs that have been produced by the Highway Authority.</p> <p>Notwithstanding the above position in relation to the lack of clear and compelling justification from the applicant for precluding delivery of a route through the Northern Grass, the Highway Authority has entered into initial dialogue with the applicant to explore the possibility of an alternative alignment for the Northern Grass section of the Manston Road to Haine Road link, should the DCO be approved without the requirement for on site delivery. Initial design process has suggested that this route would largely avoid the majority of the Northern Grass and utilise the existing Manston Road corridor to the west of the site (with appropriate improvements to the geometry and carriageway/footway construction of this route).</p> <p>To date, this process has yet to be fully concluded to the satisfaction of the Highway Authority. Moreover, it is currently unknown what impact an alternative route will have on scheme cost and third-party land requirements.</p> <p>No further progress has been made in relation to the proposed Signal Junction arrangement at Spitfire Way/Manston Road. The Highway Authority is still of the opinion that a roundabout junction would be the most appropriate solution, as it would maintain route consistency and better serve the future needs of the road network in relation to the proposed Inner Circuit Route Improvement Strategy, which forms part of the Thanet Transport Strategy. In line with the current process of considering an alternative alignment for the Manston to Haine Link, the Highway Authority has requested that the applicant consider the provision of a roundabout option for the Spitfire Way/Manston Road junction, however KCC has yet to receive a design or proposal from the applicant to assess.</p> <p>To the knowledge of the Highway Authority, Stage 1 Safety Audits requested have yet to be completed for any of the road improvements. These are essential to ensure</p>	

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		<p>that all safety implications from these schemes have been fully considered prior to approval.</p> <p>It has been agreed that the entire route between Spitfire way and the Airport Site access on Manston Road will be widened to 7.3 metres to accommodate HGV Access.</p> <p>KCC still requires details of any emergency access points onto the existing highway network.</p>	
Tr.1.19	Highways England	<p>Is Highways England content with the scope of the additional work detailed in the ES Volume 15 [APP-060] Para 3.2.2 and with the results obtained?</p>	
		<p>Highways England considers that the use of KCC's strategic traffic model is essential in establishing the impacts of the proposed Development on the Strategic Road Network in England. Highways England awaits the results from use of the model from the Applicant.</p>	<p>Noted. A revised Transport Assessment will be submitted at deadline 5.</p>
Tr.1.20	KCC	<p>The ES Volume 15 [APP-060] APP 60 Para 3.4.4 details discussions on the proposed Thanet Park Way Station.</p>	
	Network Rail	<p>i. What is the current status of the project?</p> <p>ii. Is any progress on this anticipated during the course of this Examination?</p>	
	KCC	<p>The proposed Thanet Parkway station is currently being progressed through outline design by Network Rail. This phase of design is expected to complete in June 2019. The high-level programme for the project proposes an opening date of December</p>	<p>A planning application for the Thanet Parkway Station was submitted in June</p>

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		<p>2021 (to coincide with the railway timetable change). A planning application for the proposal has been submitted and amendments are currently being made to satisfy the planning comments received.</p> <p>Paragraph 3.4.4 states that the proposed Thanet Parkway station has not been considered in the Surface Access Strategy, due to the lack of commitment to funding the station. This is appropriate at this stage in the station project's development. However, the project remains a high priority for KCC and Thanet District Council and it is part of the mitigation for the submitted Thanet Local Plan. It is also supported by the South East Local Enterprise Partnership (SELEP), who has provisionally committed £10m of funding. However, there remains a funding gap and this must be closed before the detailed design and construction phases can commence. KCC expects this to be resolved during the course of the examination, with the project seeking to approve the £10m funding from SELEP at the Accountability Board meeting in April 2019.</p> <p>Once the station's delivery is confirmed, KCC would expect the Surface Access Strategy to reflect the new station as a more suitable location for rail access than Ramsgate Station.</p> <p>One element of the Thanet Parkway station project is an upgrade to the Cliffsend level crossing. KCC notes that Network Rail asked the applicant about their impact on the same level crossing in terms of traffic flows because that might necessitate an upgrade independently of the Thanet Parkway proposal. Network Rail should confirm its satisfaction with the transport modelling from the applicant demonstrating no impact. If, conversely, it is found that there is an impact then KCC would work with the applicant to jointly upgrade the level crossing.</p>	<p>2018 which is, to-date, undecided. Funding for the scheme has yet to be secured.</p> <p>The Station is included within the KCCSHM and will be therefore be incorporated into the revised assessment work which will be submitted at Deadline 5.</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>

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	Network Rail	<p>i.</p> <p>Network Rail is currently instructed to undertake a Governance for Railway Investment Projects ('GRIP') Study on Thanet Parkway on behalf of Kent County Council. GRIP is a management and control process developed by network Rail for the development of projects on the operational railway.</p> <p>Network Rail is currently progressing a GRIP Stage 4 Study (single option development) in order to provide Kent County Council with an estimate of costs for the construction of the proposed Thanet Parkway Station.</p> <p>Kent County Council will be best placed to provide further detail with regard to the proposed scope, funding and anticipated delivery timetable for this project.</p> <p>ii.</p> <p>With regard to Network Rail's input on the project, Network Rail have currently only been instructed to deliver the GRIP Stages 1-4 Study. Kent County Council as the promoter and finder of the project will be best placed to respond to this question.</p>	Noted.
Tr.1.22	The Applicant KCC	<p>The ES Volume 15, Part 2 [APP-061] para 7.2.1 notes two future year scenarios that have been used in carrying out traffic impact assessments: 2039 Baseline with background traffic growth; and 2039 Baseline with Proposed Development traffic.</p> <p>State whether a more logical formulation should include 2039 Baseline with both background traffic growth and Proposed Development traffic.</p>	<p>The terminology of how the paragraph is written in the Transport Assessment</p>
		KCC is of the opinion that two future year scenarios should be developed.	

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		<p>2039 Baseline – this should include all growth and highway infrastructure earmarked within the emerging Thanet Local Plan (as outlined within the existing KCCSHM) plus TEMPRO growth factors between 2031 and 2039 (to encompass growth that has yet to be specifically planned for between this period).</p> <p>2039 Do Something - the identified 2039 baseline (as above) + proposed DCO development traffic.</p> <p>This scope has been agreed with the applicant in relation to the most recent modelling that has been undertaken. However, the way in which the baseline and future traffic growth has been derived within the current TA is not agreed by the Local Highway Authority.</p> <p>Please note that the Highway Authority considers that as the proposed development subject to the DCO will build out over the period of the submitted Thanet Local Plan, it should proportionately contribute towards infrastructure requirements within the Thanet Transport Strategy, either through physical improvements or appropriate financial contributions. The Highway Authority considers that the emphasis for funding the necessary changes to infrastructure apportionment should be borne by the applicant.</p>	<p>submitted in support of the DCO is misleading. Two scenarios have been undertaken, as follows:</p> <ul style="list-style-type: none"> • 2039 Baseline (which includes background traffic growth); and • 2039 Baseline (which includes background traffic growth) + Proposed Development Traffic <p>This work has been undertaken using the KCCSHM also based on the 2031 model scenario and growthed up to 2039 using TEMPRO growth factors. This will be presented in the revised Transport Assessment to be submitted at Deadline 5.</p>
Tr.1.26	KCC	<p>In respect of In the ES Volume 15, Part 2 [APP-061] Section 7, is KCC content with the lack of mitigation measures proposed for junction 8 as set out in Para 7.11.7?</p> <p>The Highway Authority disagrees with the lack of mitigation at this junction within the framework of the traffic distribution suggested within the TA; however, as outlined above, the assumptions made regarding growth factors to 2039 and traffic</p>	<p>The description of the Park Lane/A28 as left in/left out is an error and the all movements</p>

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		<p>distribution are likely to provide an unreliable picture of future traffic conditions in the locality.</p> <p>The conventional modelling methods that have been used within the TA are unreliable, due to the unique geometrical arrangement of this junction. The junction is not a 'left in/left out' arrangement as suggested (no turning movements are currently prohibited) and Park Lane is subject to a single way working system close to its junction with A28, which further reduces capacity beyond that suggested within the model. It is considered that any modelling outputs should be treated with caution, as it is unlikely that a conventional junction model will be able to accurately replicate the interaction between the single way working section, signalised pedestrian crossing on A28 close to the junction and any queueing back from the Mini Roundabout and right turn movements at A28 to park Lane which leads to blocking back of traffic on both the A28 Northbound (referred to as Junction 8a) and Park Lane.</p> <p>On site observations suggest that the baseline model significantly underestimates the existing traffic queuing that occurs within this locality, particularly on the northbound approach to the Park Lane junction. As such, this casts doubt over the validity of future model forecasts.</p>	<p>have been modelled based on the recorded traffic flows.</p> <p>The traffic survey counts included queue surveys and these were used to validate the existing junction models.</p> <p>The junction models were reviewed by KCC and no issues were identified as confirmed during a meeting on 11th October 2018. The Applicant sought this agreement before undertaking the additional modelling and junction modelling work.</p> <p>The Transport Assessment submitted in support of the DCO identified low increases in traffic queuing as a result of the development. The revised Transport Assessment, to be submitted at Deadline 5, will identify whether an improvement is required at this junction.</p> <p>A Stage 1 Road Safety Audit will be provided if an improvement scheme is required.</p>
Tr.1.27	KCC	In the ES Volume 15, Part 2 [APP-061] Table 7.56 shows that junction 16 is currently working above capacity. Para 7.18.7 indicates that this will still be the case following mitigation and using Year 2039 plus development traffic figures.	

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		<p>Is this acceptable to KCC?</p> <p>Whilst the Highway Authority would not usually seek mitigation above network baseline conditions, it disagrees with the form of mitigation at this junction. As outlined above, the assumptions made regarding growth factors to 2039 and traffic distribution are likely to provide an unreliable picture of future traffic conditions in the locality. As such this junction should be reviewed considering more recently identified modelling through the KCCSHM.</p> <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 Highway Authority, not least due to the lack of inter-visibility 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 for an informed position to be identified.</p>	<p>The scheme seeks to ensure that there will be no worsening of existing conditions. This is an appropriate approach and is not intended to solve existing issues unrelated to the airport proposals. Should KCC Highways wish to progress a larger improvement, the cost of implementing the mitigation could be used towards this.</p> <p>The revised Transport Assessment that will use the KCCSHM will be submitted at Deadline 5 and will identify whether an improvement is still required at the junctions referred to by HE.</p> <p>A Stage 1 Road Safety Audit will be provided if an improvement scheme is required.</p>
Tr.1.28	KCC	<p>In the ES Volume 15, Part 2 [APP-061] Table 7.96 shows that junction 27 is currently working above capacity. Para 7.28.6 indicates that this will still be the case following mitigation and using Year 2039 plus development traffic figures.</p> <p>Is this acceptable to KCC?</p>	<p>Whilst the Highway Authority would not usually seek to secure mitigation above network baseline conditions, as outlined above, the assumptions made regarding</p> <p>The scheme seeks to ensure that there will be no worsening of existing conditions. This is an</p>

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		<p>growth factors to 2039 and traffic distribution are likely to provide an unreliable picture of future traffic conditions in this locality.</p> <p>Notwithstanding the above, it is evident that there would be significant vehicle/queue 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 considered to be acceptable and should be addressed, with the two junctions assessed within a network model.</p>	<p>appropriate approach and is not intended to solve existing issues unrelated to the airport proposals. Should KCC Highways wish to progress a larger improvement, the cost of implementing the mitigation could be used towards this.</p> <p>The revised Transport Assessment that will use the KCCSHM will be submitted at Deadline 5 and will identify whether an improvement is still required at the junction referred to by KCC.</p> <p>A Stage 1 Road Safety Audit will be provided if an improvement scheme is required.</p>
Tr.1.29	KCC	<p>In respect of In the ES Volume 15, Part 2 (APP-061] Section 7, is KCC content with the lack of mitigation measures proposed for junction 28 as set out in paragraph 7.29.4?</p> <p>As outlined above, the assumptions made regarding growth factors to 2039 and traffic distribution are likely to provide an unreliable picture of future traffic conditions in this locality. Notwithstanding this, at face value, the impacts pertaining to this junction are likely to be modest. The Highway Authority would like to reserve its position regarding this junction until further modelling has been completed using the outputs from the KCCSHM.</p>	Noted.

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Tr.1.31	KCC	<p>In the ES Volume 15, Part 2 [APP-061] para 7.30.14 sets out the timing and other arrangements for installing mitigation measures at road junctions.</p> <p>Is KCC content with these arrangements?</p>	
Tr.1.33	<p>The Applicant</p> <p>KCC</p>	<p>In the ES Volume 15, Part 2 [APP-061] para 7.31.2 refers to works to be undertaken at three junctions in order to improve road safety and notes that two of these are also to be improved on grounds of capacity.</p> <p>Does the Applicant, with KCC, intend to give priority to the works which will improve road safety?</p>	<p>Further dialogue will be conducted with KCC regarding the mitigation requirements and trigger points based on the revised Transport Assessment which will be submitted at Deadline 5.</p>

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		<p>KCC agrees that priority should be afforded to schemes that are identified as having highway safety concerns. The timetable for implementation of the proposed highway improvement schemes has yet to be clarified by the applicant, however they should be provided at the earliest possible juncture. Further clarification is required with respect to this matter. The County Council would like to reiterate that Stage 1 Safety Audits are required for all material highway alterations before an informed assessment of them can be made.</p>	<p>As set out in the Applicant's response to this question, road safety will be a priority when works commence on the construction activities at Manston Airport. The associated highways works will give the highest consideration to this matter. The phasing of improvement works will be identified in conjunction with KCC and would be based on capacity trigger points, timing of road space booking as well as road safety requirements. For example, the timing of the Spitfire Way/Alland Grange Lane Road safety junction improvement may be timed to take place during the same period as the Spitfire Way widening works.</p>
Tr.1.35	HE	<p>In the ES Volume 15, Part 2 [APP-061] Section 8 deals with traffic impacts from the development on the motorway and trunk road network.</p> <p>Is Highways England content with the methods of analysis used and the conclusions of the analysis set out in Paras 8.5.3 and 8.5.4?</p>	

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Tr.1.36	<p>The Applicant</p> <p>KCC</p> <p>TDC</p>	<p>In the ES Volume 15, Part 2 [APP-061] Section 10 deals with sensitivity testing for possible changes resulting from the adoption of the TDC local plan. The potential for changes to the measures proposed for improvement and mitigation to alter as a result of this sensitivity testing is identified.</p> <p>At what stage, if at all, will these changes be made?</p>	
	KCC	<p>The route analysis and traffic distribution for the sensitivity test included in ES Volume 15, Part 2 [APP-061] Section 10 is not considered to be reliable, as traffic distribution has been derived using assumptions on the level of traffic redistribution by the applicant's consultancy team, rather than being informed by the KCCSHM. As outlined in response Tr.1.13, there are two key highway links missing from the list of proposed interventions.</p> <p>The delivery of the infrastructure outlined within the Thanet Local Plan is expected to be delivered in line with the delivery of strategic allocation sites. It is expected that the Inner Circuit Route Improvement Strategy will be delivered in sections with funding /delivery requirements being apportioned in an efficient way to enable strategic housing sites to be delivered in line with growth requirements.</p> <p>KCC considers that development on the Manston Airport Site should proportionately contribute towards the development of the Inner Circuit Route Improvement Strategy, in line with other strategic allocation sites within the emerging Local Plan.</p>	<p>Please refer to the Applicant's response to Tr.1.36, noting that the updated Transport Assessment will now be provided at Deadline 5.</p>
	TDC	<p>The draft Local Plan has been submitted for Examination but the hearings have not yet taken place. Clearly there will always be the possibility of changes arising from the adoption of the new Local Plan up until the point that the Inspector publishes their final</p>	<p>The Applicant is prepared to engage with the Highways Authority and Local Authority regarding appropriate levels of contribution</p>

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		<p>report. The draft Local Plan and the supplementary draft Thanet District Transport Strategy 2015-2031 provides a framework to guide schemes and projects that are deliverable but their implementation is dependent on the rate of development coming forward.</p> <p>A key part is the delivery of the Inner Circuit Route Improvement Strategy (ICRIS) which will provide direct access between the A28 and A299 and local destinations that will facilitate the strategic developments allocated in the draft Local Plan. TDC will seek contributions from any proposed development, allocated or otherwise, that will require improvements to the highway network and that the ICRIS will be delivered in phases aligned with the funding/delivery of development.</p> <p>The proposed development will have a direct impact on the ICRIS as currently the Manston to Haine Road Link of the ICRIS is proposed to connect Manston Road with Manston Court Road via the Northern Grass Area. However, it is understood that an alternative link road may be provided about which discussions are still ongoing between the Applicant, Kent Highways and TDC. It is considered that the proposed development should contribute towards the delivery of the ICRIS in line with other allocated and non-allocated developments.</p>	<p>commensurate with the impacts that may arise from the implementation of the proposed development.</p>
Tr.1.37	<p>The Applicant</p> <p>KCC</p>	<p>The ES Volume 15, Part 2 [APP-061] contains Appendices A to D of the ES, with Appendix A giving consultation meeting notes. This question relates to information included in this Appendix.</p> <p>Various points were raised by KCC in a letter to the Applicant dated 21 September 2017 about a scoping document of July 2017.</p> <p>Have all the issues raised been resolved to the satisfaction of KCC?</p>	

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		<p>In a letter dated 16 February 2018 KCC provided a response to the Applicant's second statutory consultation. In this reference was made to a letter of 21 July 2017 containing the KCC response to the first consultation and indicating that the information in both responses should be considered together. The second letter, of 21 July 2017, is not included in the bundle and should be produced.</p> <p>Have all the issues raised in it been resolved to the satisfaction of KCC?</p> <p>The KCC responses to the traffic and transport issues raised in the PEIR are included as Appendix 2 to the letter of 16 February 2018.</p> <p>Have all the issues raised in it been resolved to the satisfaction of KCC?</p>	
		<p>Letter dated 21st September 2017 (appendix 2)</p> <p>KCC can confirm its latest position of the in relation to matters raised in this correspondence are as follows:-</p> <p>The concern relating to HGV movements is partly addressed through conformation that Spitfire Way and Manston Road will be widened, however conformation is still required in relation to how and when these improvements will be delivered.</p> <p>3.1 Trip Rates and 3.5 Trip Distribution. The trip profile included within the current TA submission still contains several discrepancies and areas requiring further clarification. These are outlined in the KCC LIR. Since the submission of the DCO additional dialogue has been held with the applicant as outlined in answers Tr.5, Tr.1.18 and Tr.1.18.</p> <p>4&5 Future year/Traffic Impact. This issue has yet to be formally addressed to the satisfaction of the Highway Authority. However, more recent strategic highway modelling has been undertaken and it is expected that the applicant will be</p>	<p>Noted and further dialogue on this will be made.</p> <p>Noted</p> <p>Noted</p>

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		<p>producing a supplementary Transport Assessment/Addendum to in due course, as outlined in answers Tr.5, Tr.1.18 and Tr.1.18.</p> <p>To the knowledge of the Highway Authority, no specific agreed position has been reached between the applicant and Thanet District Council in relation to potential impacts from development on local housing needs/projections, which in turn may have a bearing on any future traffic projections.</p> <p>The KCC responses to the traffic and transport issues raised in the PEIR</p> <p>KCC can confirm its latest position of the in relation to matters raised in this correspondence are as follows: -</p> <p>Traffic generation and distribution methodology. The current position of the Highway Authority is set out in the KCC LIR. However, it is relevant to note that to the knowledge of KCC, the applicant has yet to propose a cap on freight that the airport will be permitted to handle in line with assumptions made within the Trip Rate methodology.</p> <p>MasterPlan - the concerns relating to the A256 Haine Road to B2050 Manston Road link have yet to be resolved. This is outlined in answer Tr.1.18. This extends to the concerns over the lack of appropriate links to Westwood (by all modes of transport).</p> <p>All other points raised within this answer are addressed within the LIR and/or replicated in previous questions.</p>	<p>Noted</p> <p>Noted</p> <p>Noted. The Applicant will continue to liaise with KCC regarding the alternative link road alignment.</p>
Tr.1.39 (NUMBER	The Applicant	What effect will the application have on the implementation of measures under Operations Stack and Brock (or any later iterations)?	

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Ref No.	Respondent	Question / Response	Applicant's Comments
USED TWICE)	Department for Transport Highways England KCC		
	Department for Transport	No response seen.	N/A
	Highways England	We understand that the Department for Transport will respond to this question. <u>Summary of Highways England's current position</u> <ol style="list-style-type: none"> 1. Highways England is engaged with the Applicant and with Kent County Council on traffic modelling, the assessment of the impact of the proposed Development on the Strategic Road Network, whether there is a need for mitigation of that impact on the SRN and what form any mitigation should take. 2. Unfortunately it has not been possible to agree a Statement of Common Ground with the Applicant at this time. We are hopeful of one being provided at Deadline 4. 3. Highways England's understanding of matters that are agreed and, respectively, not yet agreed with the Applicant is as follows: <u>Matters Agreed</u> <ol style="list-style-type: none"> a. Highways England is neutral on the principle of the proposed Development. 	The Applicant is continuing to liaise with Highways England regarding the impacts of development traffic at M2 J7 and agreeing a SoCG.

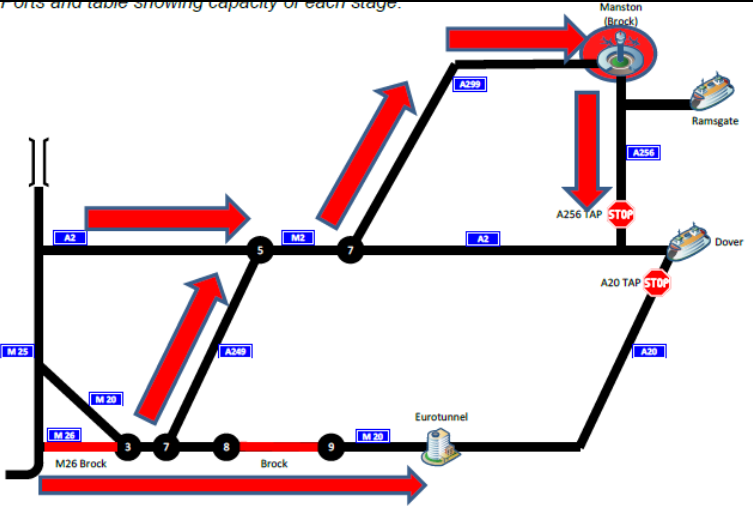
Ref No.	Respondent	Question / Response	Applicant's Comments
		<ul style="list-style-type: none"> b. The methodology on the distribution of traffic from all airport operations on to the Strategic Road Network is agreed. c. It is agreed that an assessment of the impact of the proposed Development on M2 Junction 7 is required. d. The methodology on Freight is agreed. e. The methodology on Fuel Tanker is agreed. f. The methodology on Servicing is agreed. <p><u>Matters not yet agreed</u></p> <ul style="list-style-type: none"> g. The traffic generated by the proposed development is not yet agreed. h. The impact of the proposed development on the Strategic Road Network, the need for mitigation and the form of any mitigation are not yet agreed. i. The need or otherwise for the assessment of the impact of the proposed Development on the A2/A258 'Duke of York' roundabout at Dover is not yet agreed. <p>4. Highways England will seek to reach agreement with the Applicant on outstanding matters before the end of the Examination, noting that discussions are not as far progressed as we would have expected at this stage of the process.</p> <p>5. At present Highways England remains of the view, set out in our Relevant Representation [RR-0673], that the applicant has not demonstrated that the development will have an acceptable impact on highway safety or that the residual cumulative impacts on the road network would not be severe. Therefore Highways England continues to object to the proposed development.</p>	

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Ref No.	Respondent	Question / Response	Applicant's Comments
	KCC	<p>As the statutory Highways Authority, KCC is responsible for maintaining all roads within its administrative boundary, except the motorways and major (trunk) roads which are managed by Highways England. KCC works in a multi-agency group with Kent Police, Eurotunnel, the Port of Dover, Highways England, the Department for Transport (DfT) and other authorities to manage freight traffic through Kent. This is called Operation Fennel, which includes, among others, Operation Stack on the M20. Manston Airport has also been part of Operation Fennel since 2015 and now forms part of the contingency plans in place in case of a 'No-Deal' Brexit - Operation Brock. The contingency plans are part of a four-stage process of queueing HGVs, whilst keeping the M20 open in both directions for all traffic. These stages are outlined below:</p> <p>Stage 1 – the use of port buffer zones within the Port of Dover and Eurotunnel to queue freight. Once these are full, Dover Traffic Access Protocol (TAP) will be used to queue HGVs on the inside lane of the A20 between Dover and Folkestone on the approach to Dover.</p> <p>Stage 2 – once the A20 TAP is reaching capacity, Eurotunnel and Port of Dover freight will be held between junctions 8 and 9 of the coastbound M20 with a traffic light system to release vehicles to the ports (Brock M20). A contraflow system on the London-bound carriageway between junctions 9 and 8 will allow dual two lane flow in both directions for all other (non-port) traffic.</p> <p>Stage 3 – once Stage 2 starts to reach capacity, freight traffic will be split at M20 junction 7 – Eurotunnel freight will continue to be stored in Brock M20 and Port of Dover freight will be diverted to Manston via the A249 (from M20 junction 7), along the M2 and A299. Freight vehicles will then be released to the Port of Dover via the</p>	<p>The agreement between the DfT and the site owners related to Operation Stack will not be affected by these proposals.</p>

Ref No.	Respondent	Question / Response	Applicant's Comments
		<p>A256 and held in a TAP queue at the end of the A256 before being released via the A2 to the Port of Dover.</p> <p>Stage 4 – if Eurotunnel freight capacity is greater than Stage 2 on the M20 junctions 8 to 9, then the M26 would be used to hold additional Eurotunnel freight, with Port of Dover freight using the A2/M2 before heading to Manston.</p> <p>Stage 5 – if all the above stages reach capacity, the DfT National Freight Plan should define where freight could be held outside Kent.</p> <p>These preparations should ensure that all main corridor routes through Kent are kept moving, including the M20, which will continue to provide access to Port of Dover for prioritised freight, passenger traffic and any additional flow to ensure that the Port of Dover operates at available capacity. KCC's position remains that use of the M26 as Stage 4 of the traffic management plans should not be instigated unless absolutely necessary, as a last resort. The four-stage process is explained in the Figure 1 below:</p> <p>Figure 1 – Diagram explaining the process of queuing HGVs on approach to the Channel Ports and table showing capacity of each stage.</p>	

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		<p><i>Ports and table showing capacity of each stage.</i></p>  <table border="1" data-bbox="555 831 1305 1273"> <thead> <tr> <th>BROCK STAGE</th> <th>1</th> <th>2</th> <th>3</th> <th>4</th> <th>5</th> </tr> </thead> <tbody> <tr> <td>Includes</td> <td>Use of Port of Dover and Eurotunnel Buffer Zones Use of A20 TAP</td> <td>M20 Junction 8-9 contraflow</td> <td>Dover traffic to Manston Dover A256 TAP</td> <td>M26 (last resort) Concerns remain that the implementation model with Highways remains unclear and untested</td> <td>Hold freight outside of Kent</td> </tr> <tr> <td>Freight capacity</td> <td>Buffer Zones – 1200 A20 TAP - 500</td> <td>M20 8-9 - 2000</td> <td>Manston – 5000-6000 A256 TAP – 300-800</td> <td>M26 - 2000</td> <td></td> </tr> </tbody> </table> <p>In January 2019, the DfT, supported by KCC, arranged a trial in which 89 HGVs were used to test the operation of Manston Airport in an Operation Brock scenario.</p>	BROCK STAGE	1	2	3	4	5	Includes	Use of Port of Dover and Eurotunnel Buffer Zones Use of A20 TAP	M20 Junction 8-9 contraflow	Dover traffic to Manston Dover A256 TAP	M26 (last resort) Concerns remain that the implementation model with Highways remains unclear and untested	Hold freight outside of Kent	Freight capacity	Buffer Zones – 1200 A20 TAP - 500	M20 8-9 - 2000	Manston – 5000-6000 A256 TAP – 300-800	M26 - 2000		
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		<p>The trial tested the entry arrangements into Manston, the outflow of HGVs from Manston and trialled the traffic management system of the A256 TAP on approach to Whitfield. The trial was extremely successful and has shown how Manston can best be used to store HGVs. KCC and the DfT are therefore confident that Manston will be sufficient should it need to be used for queuing HGVs.</p> <p>Effect of the DCO on Op Brock/Stack Plans</p> <p>The DfT has agreed with the existing land owner, Stone Hill Park, that Manston Airport can be reserved for the use of queueing port-bound HGVs until December 31st, 2020.</p> <p>As part of the DCO application, River Oak Strategic Partners is proposing to start construction works in Q3 2019 and to have a proposed opening year of Q4 2020. KCC would like clarification on these timescales and how they may affect the current agreement with the DfT as its use as a contingency for queueing port bound freight vehicles.</p> <p>Should the DCO be granted, any negotiations as to the extension of the use of Manston to stack HGVs would have to be made between the DfT and the future landowner. Currently, there are still uncertainties as to how long, if at all, Manston will have to be used, so it is difficult to comment regarding the future at this stage. KCC is, however, concerned that should Manston become unavailable for stacking HGVs, other less favourable contingency plans would have to be enabled, such as the use of the M26 to queue HGVs. This could cause considerably greater disruption across Kent and the South East than the use of Manston.</p>	

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Ref No.	Respondent	Question / Response	Applicant's Comments
Tr.1.40	KCC The Applicant	<p>PRoW</p> <p>Para 2.3.5 of the 'Public Rights of Way Management Strategy' (Appendix M in the Environmental Statement Volume 25: Transport Assessment, Appendices J (Junction 21B) – O 3/3 [APP-073]) cites a chance meeting with a local resident.</p> <p>Have the Applicant or KCC carried out any other more evidenced studies of current usage of the sections of the potentially affected PRoWs?</p>	
		<p>The County Council PRoW & Access team has not completed specific studies of the current usage of the sections of the potentially affected PRoW. However, the County Council is aware that the area is known to be well used for equestrian and recreational use.</p>	Noted.
Tr.1.42	KCC	<p>PRoW</p> <p>Paragraph 3.2.1 of the 'Public Rights of Way Management Strategy' (Appendix M in the Environmental Statement Volume 25: Transport Assessment, Appendices J (Junction 21B) – O 3/3 [APP-073]) states that:</p> <p>KCC East Kent Area Officer for PRoW & Access Service has been consulted regarding the Proposed Development.</p> <p>i. Comment on the proposals as set out in the 'Public Rights of Way Management Strategy'; and</p> <p>ii. confirm or otherwise its formal agreement to them.</p>	

Ref No.	Respondent	Question / Response	Applicant's Comments
		<p>It is proposed that TR8 will be rerouted along the edge of the new proposed perimeter fence of the airport. The previous route would be permanently closed and the new route permanently established.</p> <p>KCC would strongly advise the applicant to contact the KCC PRow and Access Service at their earliest convenience to discuss any required route diversions.</p> <p>The width of the bridleway will be 3 metres and it is proposed to run alongside a hedgerow planted east of the fence to allow for screening of the car park and the Airport site. Any way marking posts or other PRow infrastructure will be replaced and moved as appropriate.</p> <p>KCC requests that any hedge or vegetation planting required as screening to be at least 2 metres away from the boundary of the bridleway. This will ensure the full width of the bridleway is open and available as the hedge matures and will facilitate future vegetation clearance and hedge maintenance without requiring closure of the bridleway.</p> <p>In respect of ongoing maintenance, it will be expected that site operators take on maintenance responsibilities for any landscaping and enhancements to benefit the PRow network. In the case of any planted vegetation screening, this should be cut on a regular basis so that PRow are open and available to their full width at all times. KCC requests that maintenance responsibilities are captured within the DCO.</p> <p>It is proposed that TR9 will be extinguished south of the perimeter fence of the airport so that no PRow now falls within the redline boundary of the site. The County Council accepts that the part of the bridleway that lies within the site boundary will have to be extinguished and that this is not currently used, as it is a dead end route.</p>	<p>The Applicant notes these comments and will further consider the PRow Strategy, consulting with the KCC PRow and Access Service as part of the ongoing process of agreeing the SoCG.</p>

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Ref No.	Respondent	Question / Response	Applicant's Comments
Tr.1.44	KCC The Applicant	<p>PRoW</p> <p>Paragraph 3.2.1 of the 'Public Rights of Way Management Strategy' (Appendix M in the Environmental Statement Volume 25: Transport Assessment, Appendices J (Junction 21B) – O 3/3 [APP-073]) states that:</p> <p><i>"KCC requested that PRoW are to be created and funded under a Section 106 Agreement and would be maintained by KCC while remaining part of Manston Airport land."</i></p> <p>i. Confirm or otherwise that any agreement will be made a Development Consent Obligation under s174 of PA2008 of the 2008 Planning Act (PA2008); and</p> <p>ii. report on progress in developing this agreement.</p>	
		<p>The County Council agrees that any agreement made between KCC and the applicant will be made through a Development Consent Obligation under s174 of the 2008 Planning Act, as appropriate. KCC would expect money to be secured to improve the surface of the existing and diverted bridleways to a minimum width of 3m along the entire length. This will include bridleways TR8 and TR10. KCC is happy to supply a cost for this work. There has currently been no progress in developing this agreement.</p>	<p>The PRoW Management Strategy 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>
Tr.1.46	KCC The Applicant	<p>PRoW</p> <p>Paragraph 4 of 'Appendix A - Site visit undertaken on 31 of October 2017 - Meeting minutes' in the 'Public Rights of Way Management Strategy' (Appendix M in the Environmental Statement Volume 25: Transport Assessment, Appendices J (Junction 21B) – O 3/3 [APP-073]) states that:</p>	

Ref No.	Respondent	Question / Response	Applicant's Comments
		<p><i>"Currently, PRow applications take about 2.5 years to be looked at by KCC. That timescale is likely to soon reach 3 years. If, however, the submission is classed as Nationally Significant Project, that timeframe may possibly be shorter."</i></p> <p>Table 3.1 of the 'Public Rights of Way Management Strategy' (Appendix M in the Environmental Statement Volume 25: Transport Assessment, Appendices J (Junction 21B) – O 3/3 [APP-073]) states in relation to TR8 that:</p> <p><i>"The previous route will be permanently closed and the new route permanently established. This will be done early in the project life cycle so it is established before major works take place."</i></p> <p>i. Comment on the apparent discrepancy between the timelines for the PRow application and the commitment to undertake this action early in the project life cycle; and</p> <p>ii. Show where the need for this consent is referenced in 'Details of Other Consents and Licences that may be required' [APP-087]</p>	
		<p>The County Council notes that the details of the PROWs that may be required to temporarily close or be diverted, with explanation of how this will be carried out, are listed as part of the Development Consent Order. As such, it is understood that there is no requirement for diversions and extinguishments to be completed under s257 of the Town and County Planning Act 1990. It is requested, however, that the County Council is contacted by the applicant to discuss the paths that would be temporarily closed. This would enable the PRow team to negotiate these closures, to ensure that disruption for the public would be minimised. Therefore, there is no need for the diversions and extinguishments to be completed under s257 of the Town and County Planning Act 1990 and be listed in 'Details of Other Consents...', provided the necessary details are included as part of the DCO.</p>	<p>The Applicant notes these comments and will further consider the PRow Strategy, consulting with the KCC PRow and Access Service as part of the ongoing process of agreeing the SoCG.</p>

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Tr.1.47	KCC Network Rail	<p>PRoW</p> <p>Paragraph 4.1.6 of the 'Public Rights of Way Management Strategy' (Appendix M in the Environmental Statement Volume 25: Transport Assessment, Appendices J (Junction 21B) – O 3/3 [APP-073]) states in connection with a strategy to create a new link between Thanet Parkway Station and TR9 that:</p> <p><i>"[The] Creation of a new link around the eastern boundary of the proposed Airport redevelopment will not be progressed. This however could be potentially addressed by a bus service providing a north south link should the planned Thanet Parkway Station go ahead."</i></p> <p>Comment on this proposed decision in relation to any proposals for Thanet Parkway Station.</p>	
	KCC	<p>The proposal for the Thanet Parkway Station does not include a direct walking and cycling link (or public right of way) to the site of the proposed airport redevelopment.</p> <p>The Public Rights of Way Management Strategy states that a new link from bridleway TR9 to the proposed Thanet Parkway Station across the site or around the edge of the site cannot be provided as part of these development proposal. The reason stated for not providing this route is because 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> <p>However, it does include a new link to Cliffsend via the footpath (reference TR32) with a new connection following the field boundary to Clive Road.</p> <p>In future, if the airport is reopened, KCC would welcome the reconsideration of a new link to the station. The County Council requests that the additional connection to Thanet Parkway is still considered by the applicant, as this will greatly benefit the sites connectivity and will further increase opportunities available to the local community for recreation, active travel and exercise.</p>	<p>The Applicant acknowledges TDC's desire to promote pedestrian and cycle links to the proposed Thanet Parkway Station. They are prepared to continue discussions with TDC and KCC on this matter, acknowledging the difficulties of providing public access to any airside location.</p>

Ref No.	Respondent	Question / Response	Applicant's Comments
	Network Rail	<p>Network Rail does have any objection in principle of the provision of a bus service to provide the north-south link referred to. However, Network Rail note that bus service provision is proposed to be increased in frequency both through the provisions of new bus services and by extending existing routes from Ramsgate Station to the proposed Manston Airport. Network Rail's concern is that the proposed routes of any additional bus services may adversely affect the safety of the operational railway.</p> <p>For example Network Rail has expressed concern to the Promoter regarding the increased vehicular usage of the Cliffsend Level Crossing at Foads Lane. The Promoter has confirmed to Network Rail that no construction traffic will be routed over the Cliffsend Level Crossing in connection with the construction of the proposed development of Manston Airport. However, no information has been provided to Network Rail with regard to the proposed routes of any additional bus services and in particular whether routes for such services will include buses using the Cliffsend Level Crossing at Foads Lane. This information is not set out in the Environmental Statement Transport Assessment.</p> <p>Further information on the routes and frequency of any proposed bus services in particular the impacts on Cliffsend Level Crossing at Foads Lane would be welcomed by Network Rail.</p>	<p>The Applicant is committed to providing shuttle bus services from Ramsgate Station (and/or Thanet Parkway Station, if it is built), which should reduce vehicular traffic across the level crossing.</p>