



Mr. Kelvin MacDonald
National Infrastructure
Temple Quay House
2 The Square
Bristol BS1 6PN

**Environment, Planning and
Enforcement**

Invicta House
County Hall
Maidstone
ME14 1XX

Email: strategicplanning@kent.gov.uk

BY EMAIL ONLY

3 May 2019

Dear Mr. MacDonald

**Re: Application by RiverOak Strategic Partners for an Order Granting
Development Consent for the upgrade and reopening of Manston Airport
– Deadline 6 Submissions**

Please find attached the County Council's responses to the Examining Authority's Second Written Questions and the Examining Authority's Second Written Questions dealing with Traffic and Transport.

Kent County Council (KCC) will continue to work closely with the applicant to address all technical issues associated with, and arising from, this proposal.

KCC's overall position on this site is well documented, referenced and summarised in a number of documents submitted as part of this Development Consent Order (DCO) Examination (including the applicant's [Environmental Statement](#) and [Planning Statement](#)). The County Council would reiterate that it maintains its previously published position in respect of the future of Manston Airport. The Authority's [published Position Statement](#) 'Manston Airport under private ownership: The story to date and the future prospects' (March 2015), states that: *"promoting job creation, supporting business growth and generating economic prosperity for the residents of East Kent is - and always has been - Kent County Council's primary objective. Kent County Council (KCC) has never deviated from this"* (see page 13).

At this juncture in the DCO Examination process, for completeness and transparency, the County Council would like to make it clear that it has never offered its support in principle to the DCO application submitted by RiverOak Strategic Partners.

At a time-limited debate on Manston Airport at a Full Council meeting on 16th July 2015, the County Council's position states: *"that we the elected members of KCC wish it to be known that we fully support the continued regeneration of Manston and East Kent and will keep an open mind on whether that should be a business park or an airport, depending upon the viability of such plans and their ability to deliver significant economic growth and job opportunity."*

The County Council has reviewed the dDCO against its previous responses to the Examining Authority's First Written Questions. KCC would like to comment on the following matters, which are in addition to, and should be read in conjunction with, the DCO matters raised in KCC's response to the Examining Authority's Second Written Questions and Second Written Questions dealing with Traffic and Transport.

Aviation

KCC acknowledges that Thanet District Council as the local authority has the duty in terms of matters and issues relating to noise (under the Environmental Protection Act 1990). KCC has provided comments on noise in a number of the Examination consultation responses, in order to draw attention to the evidence available that relates to potential aviation noise impacts on the communities that surround the site.

KCC would welcome the incorporation of new Article that specifies that the operation of the airport is subject to a total annual air transport movement limit and a total annual General Aviation movement limit. In addition, the inclusion of a requirement that would state that aircraft cannot take-off or be scheduled to land at night between 2300 and 0600 would be welcomed.

Given that there are now proposed to be no night flights, KCC has requested a revision to the HGV movement profile accordingly. As matters currently stand, an even spread across the 24 hour period is not agreed by KCC.

Highways and Transportation

In view of the passage of time since the submission of the DCO application and the extensive engagement that has taken place between the applicant's transport consultants and KCC Highways and Transportation officers during the pre-submission and post-submission periods, it is disappointing that so many of the Local Highway Authority's outstanding concerns remain unacknowledged and/or unresolved.

Whilst there is now sufficient confidence that the localised off-site highway capacity impacts of the Proposed Development have been assessed on an appropriate basis (i.e. using the KCC Thanet Strategic Highway Model), there remain significant concerns with the mitigation strategy presented. Moreover, it is evident from the Transport Assessment Addendum that many of the planned Thanet Transport Strategy (TTS) interventions that are earmarked as part of the emerging Thanet Local Plan mitigate the impact of the Proposed Development. Therefore, an appropriate financial contribution will be sought from the applicant towards this strategy, should the DCO application be approved. In order to define this contribution, the applicant will be required to fund the completion of a revised apportionment exercise by KCC Highways and Transportation specialist consultants, as the Proposed Development falls outside the Local Plan for which the original exercise was completed.

With regard to the proposed Manston-Haine Link Road, there remains insufficient justification for the alternative alignment proposed to the north of the Northern Grass Area, despite repeated requests for this. Until such time that this further justification is provided, and a full cost estimate of the alternative alignment (including land costs) is submitted, KCC remains strongly of the view that the TTS Link Road alignment should be accommodated within the Northern Grass Area. There may be wider amendments required to the draft DCO, depending on how the issues raised

associated with proposed alignment of the Manston-Haine Link are taken forward by the applicant.

KCC also continues to have concerns regarding the apparent lack of commitment by the applicant to enhancing the accessibility of the site by non-car travel modes. This is not only a fundamental national and local planning policy requirement for major development proposals but is of importance in this case in view of the currently peripheral location of the site in relation to walking, cycling and public transport infrastructure.

Other comments on the dDCO

- Article 12(2) – the dDCO has not been amended to require the applicant to seek written consent from KCC to use the highway as a temporary working site. The applicant will need to obtain written permission/a permit from the KCC Streetworks team, who will require details of exactly where they propose to work and when, including any proposed traffic management proposals at the time of inception.
- KCC requested that the dDCO should capture maintenance responsibilities (former reference TR1.42, in respect of Public Rights of Way (PRoW)). However, no amendments to that affect have been made. Measures need to be in place (such as through a management company) to ensure that adjacent vegetation/planting to the PRoW is maintained. KCC would have expected to see amendments in the form of a new requirement in Schedule 2.
- In respect of the temporary closure or diversion of PRoW (former reference TR1.46), KCC requested that the applicant discusses with KCC any PRoW that would temporarily be closed or diverted, to minimise disruption. It does not appear that a change has been made in Schedule 2 to reflect these comments. This matter will need to be addressed and it is again requested that the applicant notifies KCC of any closures, in order that KCC can post notices on site to inform the public, prior to closure. KCC would require six weeks' notice to process this. It is requested therefore that a requirement is imposed to notify KCC six weeks before any planned diversion or closure of the PRoW.
- It is understood that that the applicant is looking to gain rights to take over the culverted private sewer outfall, and that a number plots of land where the outfall runs, or where access rights are needed, run through highways land. KCC will look to discuss this further with the applicant in order to establish how this could be dealt with. Subject to the outcomes of discussions, the draft DCO may need to be revised to address this matter.

The County Council looks forward to continued working with the applicant and Planning Inspectorate as the project progresses through the Examination process and will welcome the opportunity to comment on matters of detail, and any future revised dDCOs, as may be required throughout the Examination.

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

Yours sincerely,

**Environment Planning and Enforcement
Kent County Council**

Encs:

Appendix A: KCC's response to the ExA's Second Written Questions

Appendix B: KCC's response to the ExA's Second Written Questions dealing with Traffic and Transport.