

ExQ2	Question to:	Question:
Tr.2	Transportation and traffic	
Tr.2.2	Kent County Council (KCC) Thanet District Council (TDC)	<p>Alternative Manston-Haine Link Junction 2 A299 / A256 / Cottington Link Rd Junction 4 A299 / B2190 Junction 6 A299 / Seamark Rd / A253 / Willetts Hill Junction 7 A299 / A28 Junction 12: Manston Road / B2050 / Spitfire Way Junction 15: Manston Road / Hartsdown Road / Tivoli Road / College Road / Nash Road Junction 16 Ramsgate Rd / College Rd / A254 / Beatrice Rd Highway Safety Improvement at Spitfire Way/Alland Grange Road Highway Safety Improvement at Manston Road/Manston Court Road The removal of junction mitigation schemes at Junctions 1, 10, 13, 17, 20, 21a, 21b, 26 and 27 as set out in APP-061</p> <p>Provide any views as to whether these proposals separately and/or together constitute a material change to the Proposed Development?</p> <p>It is the opinion of KCC that the change in scope of mitigation outlined within the TA addendum would represent a material change to the identified mitigation associated with the development, for the following reasons: -</p> <p>The applicant has supplied the Examining Authority with their response to question 2.1 on the 16th April. It states that in their opinion, the off-site highway improvements do not form part of the DCO, as they will be dealt with through Section 278 Highway Act 1980 Agreements. However, the highways improvements are required as a result of the DCO and are intended to mitigate the impacts of the development approved through the DCO process. In the circumstances, KCC considers it essential that any requirement to enter into Section 278 Highways Agreements must be included within the DCO, whether they are off-site or on-site, because they are required in order to facilitate the development. Should the new highways mitigation proposed be agreed, it is essential there is a robust legal mechanism in place to ensure that necessary highway mitigation is secured and enforceable in the future. This could be achieved by an appropriate requirement in Schedule 2 to the draft DCO.</p> <p>The changes in highway mitigation scope could lead to works either being newly proposed or no longer being proposed on parts of the highway network, in respect of which local stakeholders will have had no prior knowledge at the point of implementation by KCC and without any opportunity to make relevant comments/ representations. It therefore raises clear issues of natural justice, if local residents have not had an opportunity to comment through the DCO process.</p> <p>It is unclear, what publicity, if any, has been carried out by the applicant to ensure that people who are not interested parties have an opportunity to make representations on the changes to the mitigation associated with the proposed development.</p> <p>Consultation with local stakeholders in relation to proposed off site highway alterations is usually undertaken during the process of obtaining planning consent. There is no legal requirement to consult at the point a Highway Agreement is entered into under Section 278 of the Highways Act 1980, as relevant planning consent would have already been obtained. A similar process should be followed for the DCO process.</p> <p>Several options are available to the Examining Authority to ensure that the principles of fairness and reasonableness are adhered to, including using the power to extend the examination pursuant to section 98(4) of the Planning Act 2008, make changes to the examination timetable pursuant to section 87(1) of the Planning Act 2008, to allow for representations to be made regarding the proposed changes to the mitigation associated with the development or exercise its discretion under rules 10(3) and 14(10) of the Infrastructure Planning (Examination Procedure) Rules 2010 to permit representations made by people who are not interested parties, should it consider it appropriate to do so.</p> <p>Notwithstanding the above, many of the proposed junction mitigation schemes do remain as per the originally submitted Transport Assessment (TA) and it is disappointing that KCC's outstanding concerns with these schemes have not been addressed in the TA Addendum (e.g. omission of Stage 1 Road Safety Audits and vehicle swept path analysis drawings).</p> <p>It should be noted that the area covered by the Thanet Strategic Transport Model (TSTM) does not align with the TA study area. There are therefore omissions of junctions that fall outside of the TSTM area, and for this reason, cannot be agreed by KCC, unless and until such time that the absolute impact of the proposed development traffic on those junctions is confirmed. This is the only way in which the Local Highway Authority can make a professional judgement as to whether full junction capacity assessments and/or mitigation is required.</p> <p>It is further noted from the TA Addendum that the measures contained within the Thanet Transport Strategy mitigate the impact of the proposed development at several junctions that previously required standalone mitigation. As such, an appropriate financial contribution under section 106 of the Town and Country Planning Act 1990 is sought from the applicant towards this strategy; on or before the decision in respect of this DCO is issued. Only contributions that are necessary to make the proposed development acceptable in planning terms, that are directly related to the development and are fairly and reasonably related in scale and kind are sought i.e. in compliance with the provisions of Regulation 122 of the Community Infrastructure Levy Regulations 2010. In order to quantify the contributions necessary, the applicant must fund the completion of a revised apportionment exercise by KCC's specialist consultants, as the proposed development falls outside of the Local Plan and no specific data is readily available for this reason.</p>

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		<p>It is essential that the proposed DCO does not prejudice the delivery of the Manston to Haine highway link. The indicative layout of the alternative link encroaches on an area of land earmarked for built development, as outlined within the indicative masterplan and the indicated radar protection zone. It is essential that the provision of necessary land parcels to facilitate an appropriate form of link road (within the limits of the red line boundary) are secured as part of this development as part of the DCO process to avoid the need for KCC to either seek to compulsorily acquire the land or acquire rights over the land from the applicants after the DCO has been granted.</p>
Tr.2.8	The Applicant TDC KCC	<p>Manston-Haine Link</p> <ul style="list-style-type: none"> i. Do the TDC draft Local Plan to 2031 and draft Thanet Transport Strategy allow for flexibility of routeing? ii. Will the alternative route deliver the same benefits sought by the draft Thanet Transport Strategy? iii. Is the alternative route acceptable to KCC and TDC? <p>i. It is the opinion of KCC as the Local Highway Authority that the wording of draft Local Plan Policy SP47 and the draft Thanet Transport Strategy (TTS) does allow some flexibility for an alternative route to be considered. Notwithstanding this, it is recommended that the views of Thanet District Council (as the Local Planning Authority) are sought and agreed in principle prior to a decision being made in relation to this matter, as the making of specific local planning policy falls within its jurisdiction. The general route is part of the Thanet Local Plan Policy and the Thanet Transport Strategy, which were both subject to Regulation 19 consultation as part of the draft Thanet Local Plan - and as such is identified in the Local Plan.</p> <p>The original TTS alignment of the Manston-Haine Link provides for a scheme that complies with applicable design guidance and maximises the scope for the road to be constructed as part of allocated development sites. There is some scope for flexibility of routeing, however, there would need to be robust planning justification for a departure, particularly were it to require the acquisition of more substantial sections of third-party land, potentially by way of a Compulsory Purchase Order.</p> <p>ii. It is anticipated that the proposed alternative route (if considered in a scenario where aviation uses were recommenced on the Manston Airport site) could deliver very similar traffic routing benefits when compared to the extant proposals (subject to an appropriate form of junction being delivered at Manston Road/Spitfire Way). However, at this stage, it is not known if the alternative route will have a material impact on overall scheme cost.</p> <p>KCC's initial review of the proposed alternative alignment is that it will lead to a far greater land take requirement in relation to existing farmland to the north of the application site (which appears to be previously undeveloped agricultural land). This may have bearing on the promptness and/or economical delivery (i.e. in relation to CPO, scheme cost and delivery timescales) of this important infrastructure scheme and the potential unnecessary loss of agricultural land.</p> <p>It is important to point out that the alternative route would be lengthier, contain departures from design standard and require the further acquisition of third party land, potentially by way of a Compulsory Purchase Order. Whilst the highway capacity benefits of the route may therefore at first glance appear to be of a similar order of magnitude as that proposed by the TTS, the costs could be consequently be significantly greater.</p> <p>iii. KCC considers that the most appropriate/economical way of delivering this link infrastructure (taking into account the results of archaeological evaluation) is to route it through the Northern Grass and integrate its delivery as part internal access road infrastructure. This would avoid the unnecessary use of additional previously undeveloped agricultural land to the north and reduce the amount of off-site highway works required (which is an aim of the Transport Strategy as and when site constraints allow). It would also reduce potential environmental/amenity impacts on residential properties located on Manston Road. In addition, the cost of delivering the link could be reduced.</p> <p>More clear and compelling justification should be provided in relation to why the link cannot be provided along its original alignment. If acceptable justification is provided and, subject to some more detailed changes (including agreeing the form/geometry of the junction at Spitfire Way/ Manston Road) and clarification over scheme delivery costs and funding/delivery mechanisms, the alternative route may be acceptable in principle.</p> <p>It is also essential that the land required to deliver this link within the red line of the application site is secured as part of the DCO process. The indicative masterplan for the site currently suggests that built development and a radar protection zone is likely to be located within the required land parcels, which could compromise the deliverability of the alternative link. The applicant should outline how they intend to address this issue.</p> <p>On the basis of the justification currently provided by the applicant and in the absence an acceptable resolution to the above issues,</p>

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			the alternative route is not currently acceptable to KCC.
Revised Transport Assessment (RTA) (5 April 2019) [REP5-021]			
Tr.2.11	The Applicant KCC	<p>Section 3.2 Study Area Sets out that the study area has been revised and Junctions 1, 9, 14, 17, 18, 19, 22, 23, 24, 25 and 28 have been removed and Junction 29 'End of the Manston to Haine Link Road with the A256 and Haine Road' has been added.</p> <p>i. Provide an explanation of how this position has been arrived at. ii. In the absence of a signed Statement of Common Ground (SoCG), is this agreed by KCC?</p>	<p>i. For clarification, the traffic routing from the proposed development has now been derived from a select link analysis exercise, which was extracted from the KCC Strategic Highway Model (referred to in the TA addendum as the KCC TSTM).</p> <p>The detail of this flow distribution does not appear to have been appended to the TA addendum document. It is recommended that this data is extrapolated into a network flow diagram (including a comparison of the tested scenarios) in order to provide more visual clarity over the level of additional impact on the surrounding highway network. This would also assist in efficiently identifying areas of significant traffic increase (both inside and or links that fall outside of the detailed area of model coverage). At present, the applicant appears to have made the decision to restrict their assessment to the extent of KCC TSTM coverage.</p> <p>Without the above information clearly presented within the TA, it is not possible to easily identify exactly where traffic from the development will be increasing on the surrounding highway network and if the proposed scope of assessment is appropriate. It is agreed that areas of the network that are subject to minimal or no traffic impact will not generate a requirement for additional assessment (and can be removed from scope), however there appear to be several junctions that have been omitted simply due to them not being included in the KCC TSTM network, which at this stage is not accepted.</p> <p>Whilst it is recognised that most of the local road network which is covered by the KCC TSTM will assist in the assessment of potential traffic routing, appraisal of impact should not necessarily be solely constrained by the model coverage area.</p> <p>At this stage junctions 1,9, 25 & 28 are notable omissions. If these junctions (or all of the associated turning movements) are not included within the KCC TSTM, it does not automatically render impact assessment as being unnecessary. The applicant should outline a strategy for dealing with this issue for further consideration through the examination process.</p> <p>ii. At this stage, KCC refutes the assertion within the TA addendum that the removal of junctions listed in this section has been formally agreed. As stated in response to Question TR.2.2 (above), the area covered by the TSTM does not align with the TA study area and therefore the omission of junctions that fall outside of the TSTM area cannot be agreed by KCC until such time that the absolute impact of the proposed development traffic on those junctions is confirmed. The Local Highway Authority can then make a professional judgement as to whether full junction capacity assessments and/or mitigation is required in these cases.</p>
Tr.2.12	The Applicant KCC	<p>Paragraph 3.2.5 Sets out that the validation of the junctions (Section 5 of the TA [APP-061]) has been checked by KCC's consultants and have been confirmed as satisfactory. In the absence of a signed SoCG is this agreed by KCC?</p>	<p>It is not entirely clear what this statement encompasses, however it would appear that this is intended to refer to the geometrical inputs used to inform the individual junction models.</p> <p>If this is the case, then this is agreed, however further clarification is required to provide definitive confirmation.</p>
Tr.2.13	KCC	<p>Section 3.3 Future Year Junctions Does KCC accept the Applicant's approach to future year junctions?</p>	This is agreed by KCC.
Tr.2.14	The Applicant KCC	<p>Paragraph 4.2.4 (HGV Movements) Assumes arrivals and departures per day have been evenly split across the 24-hour period, with some slight tailing off in the 21:00 – 00:00 period as may be expected with overnight shift working.</p> <p>i. Does this include HGV movements for the NGA? ii. If so, is such a distribution appropriate for the uses proposed? iii. Given that there are now proposed to be no scheduled night flights (Revised Noise Mitigation Plan [REP4-023] states that aircraft cannot take-off or be scheduled to land between 2300 and 0600), is spreading HGV traffic movements evenly</p>	<p>i. It is understood that this does not include HGV movements for the NGA.</p> <p>ii. N/A</p> <p>iii. KCC would expect the applicant's consultants to revise the HGV movement profile to accord with the removal of scheduled night flights from the proposals. Should no revisions be proposed, robust justification will be required.</p> <p>iv. This assumption would appear reasonable. Again, KCC would expect the applicant's consultants to revise the HGV movement profile accordingly and/or to robustly justify no such revision.</p> <p>v. Subject to the applicant's response to points iii. and iv. there is evidently the potential for a greater level of HGV movements during</p>

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		<p>across the 24 hour period justified?</p> <p>iv. It is now anticipated that a significant number of movements are likely to be associated with a new e-commerce integrator. Would it be reasonable to expect HGV movements to be clustered around the arrival and departure of such aircraft to ensure speed of delivery to the customer?</p> <p>v. If so, would this, coupled with the overall night flight ban, not result in a much greater level of HGV movements in the day than in the night, which would need to be tested?</p> <p>vi. In light of the commitment for no scheduled night flights, is an even spread across the 24 hour period still agreed by KCC?</p> <p>vii. Should HGV movements and their timings be secured in the dDCO, for example, through a HGV management strategy?</p>	<p>the daytime period; the capacity impact of which would need to be tested. Until the impact of this change has been identified it is not possible to comment on the subsequent need for this to be tested within the existing TA.</p> <p>vi. As per point iii above, KCC would expect the applicant's consultants to revise the HGV movement profile to account for this or to provide robust justification should no such revision be proposed. As matters currently stand, an even spread across the 24-hour period is not agreed by KCC.</p> <p>vii. KCC's preference would be for HGV movements and their timings to be secured in the DCO through an HGV Management Strategy or similar instrument.</p>
Tr.2.17	The Applicant KCC	<p>Tables 4.1 (Passenger Mode Share Estimates Day) and 4.2 (Passenger Mode Share Estimates Night) Sets out the assumed passenger mode share.</p> <p>i. How does the commitment to have no scheduled night flights affect such patterns?</p> <p>ii. Is this agreed by KCC?</p>	<p>i. In the absence of scheduled night flights, KCC would expect only the Passenger Mode Share Estimates in Table 4.1 to be adopted in the TA.</p> <p>ii. The passenger mode share estimates are now agreed by KCC.</p>
Tr.2.19	KCC	<p>Trip generation methodology In the absence of a SoCG, do KCC accept the assumptions set out in the TA [APP-061] in terms of:</p> <p>i. 10% 'tail to tail' ratio (TA Paragraph 6.4.5);</p> <p>ii. Traffic generation data provided by 'the Client' (Paragraph 6.4.4 and Table 6.6);</p> <p>iii. Average loads provided by 'aviation experts' (Paragraph 6.4.17); and</p> <p>iv. 45% of staff not on site on a particular day (day off, off shift, sickness) (Paragraph 6.4.56)?</p>	<p>i. This assumption is accepted by KCC.</p> <p>ii. This data is accepted by KCC, subject to appropriate caps being placed on any grant of Development Consent Order to ensure that the trip generation assessment presented in the TA is robust.</p> <p>iii. This assumption is accepted by KCC.</p> <p>iv. This assumption is accepted by KCC in respect of airside cargo facility freight staff.</p>
Tr.2.21	KCC	<p>Section 4.7 and 4.8 Sets out the anticipated operational airport traffic distribution. Do KCC agree with the network scope and the anticipated vehicular distribution from all operational sources?</p>	<p>These trip distribution methodologies are agreed by KCC.</p>
Tr.2.23	The Applicant KCC	<p>Section 6.2 Assessment Scenarios Identifies assessment scenarios based upon output results of testing the Proposed Development using the KCC Thanet Strategic Traffic Model (TSTM).</p> <p>i. Is the use of the 2031 Do Maximum Scenario as the future baseline justified and is it agreed by KCC?</p> <p>ii. Can it be guaranteed that the improvements associated with the draft Thanet Transport Strategy, including Thanet Parkway Station, will be delivered?</p> <p>iii. What would be the consequences if such improvements were not delivered?</p>	<p>i. In line with expected Local Plan Growth, which is currently forecast to 2031, the Do Maximum scenario is considered to be an acceptable baseline with which to consider the full quantum of development that is planned within the DCO application, however as outlined in KCC's response to round 1 of Inspector's Questions (TR.1.22, TR.1.31 & TR.1.36), as the proposed development subject to the DCO will build out over the period of the Thanet Local Plan, it should proportionately contribute towards strategic infrastructure requirements, either through physical improvements or appropriate financial contributions (or a combination of both).</p> <p>The emphasis for funding the necessary changes to existing infrastructure apportionment studies and any revised cost estimates for infrastructure that will be altered as a result of the DCO should be borne by the applicant.</p> <p>ii. Whilst it cannot be guaranteed that the TTS interventions will be fully implemented by the end of the Local Plan period, KCC considers that the Strategy is deliverable and is committed to working with Thanet District Council and developers to bring them forward in a timely manner. This may include the use of forward funding from third parties (e.g. Government and/or the Local Enterprise Partnership). KCC refers to its response below, in TR.2.24 in respect of the Thanet Parkway Station.</p>

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			<p>iii. If such improvements were not delivered, then KCC would need to apply its professional judgement as to whether individual development proposals would have a 'severe' residual impact on the local highway network without mitigation, in line with national planning policy.</p> <p>The consequences of infrastructure not being delivered would lead to KCC & TDC reassessing infrastructure improvements at the relevant juncture. In the case of Manston to Haine link road, it is possible that an interim package of localised widening (yet to be formally defined) could be implemented to manage highway flow/safety. Therefore, any contribution mechanism should allow flexibility to enable alternative mitigation to be implemented in the unlikely event that unforeseen delay is realised in relation to the delivery of highway infrastructure.</p>
Tr.2.24	The Applicant KCC Network Rail	<p>Thanet Parkway Rail station</p> <p>i. Is there a realistic likelihood that the Thanet Parkway Rail station will be delivered and has the identified funding gap (KCC's response to the ExA first written question Tr.1.20 [REP3-139]) been resolved?</p> <p>ii. What is the latest position with the planning application?</p>	<p>i) There is a high likelihood that Thanet Parkway rail station will be delivered by December 2021. The funding gap has now been closed. At the South East Local Enterprise Partnership (SELEP) Accountability Board meeting on 12th April 2019, SELEP committed £14 million funding for Thanet Parkway. With contributions from Thanet District Council, East Kent Spatial Development Company and KCC also secured, KCC will underwrite any additional funding required to complete the delivery of the project. The project will proceed, pending a final cost estimate for a design and build contract by Network Rail, expected in August 2019.</p> <p>ii) The planning application is currently being amended to accommodate design changes necessitated by planning comments. A determination following resubmission of the application is expected next year.</p>
Tr.2.26	KCC	<p>Table 6.1 '2031 – 2039 Growth Rates' Contains growth rates for years 2031-2039, calculated from TEMPRO and Paragraph 6.2.1.5 sets out the methodology for calculating the future years scenarios. Does KCC agree with these assumptions?</p>	<p>These assumptions are agreed by KCC.</p>
Tr.2.27	KCC	<p>Thanet Parkway Railway Station 2031 to 2039 KCC in response to the ExA First Written Question Tr.1.13 [REP3-139] stated: <i>"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."</i> In 'Comments on Third Party Responses to First Written Questions [REP4-029]' the Applicant stated that: <i>"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."</i></p> <p>i. Is this accepted by KCC? ii. Who would fund this bus service, at least initially?</p>	<p>i. This response is accepted. Any potential 2039 scenario related to Thanet Parkway Rail Station would at this stage need to be heavily caveated and is likely to be based on similar economic and population growth assumptions to those included in TEMPRO.</p> <p>Only when a specific Local Plan settlement strategy is identified by the Local Planning Authority (which encompasses 2039), will a robust set of forecasts be achievable. This is because the proposed location of residential development within the district (or neighbouring districts) will have a direct bearing on the potential growth in passengers at the station beyond 2031 (the current draft Local Plan).</p> <p>At this juncture, TEMPRO is considered to represent an acceptable method of calculating highway network growth between 2031 and 2039.</p> <p>ii. The provision of a shuttle bus service between the proposed airport and the Thanet Parkway Station should be funded by the applicant/airport operator as a direct measure to encourage sustainable travel modes in accordance with national planning policy. It will also underpin any assumptions made in relation to modal split in favour of sustainable transport.</p> <p>It may be possible for the applicant to negotiate with existing bus operators (and in discussion with the KCC Public Transport Team) to identify a longer term commercially viable solution, however, to date, KCC is unaware of any discussions taking place.</p>

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Tr.2.28	KCC	<p>Section 6.3 Junction Capacity Assessments Sets out the junction capacity assessments for Junctions 2, 3, 4, 5, 6, 7, 8A, 8B, 10, 11, 12, 13, 15, 16, 20, 21A, 21B, 26, 27 and 29. Does KCC agree with these assessments?</p>	<p>KCC has the following detailed comments on these junction capacity assessments: -</p> <ul style="list-style-type: none"> As previously advised, should the proposed scheme of mitigation for the A299/A256 roundabout be taken forward, it will require refinement as the lane markings on the A256 northbound approach to the junction are potentially confusing and do not cater for right turning movements. The ARCADY assessment should be updated accordingly. Additionally, swept path analysis should be undertaken to demonstrate that the three proposed circulatory lanes would operate safely. It was also previously advised that the proposed schemes of mitigation for the A299/B2190 and A299/A253 roundabouts are not considered to deliver practical benefits to the capacity of the junctions, in view of the limited flare lengths proposed. There are potential highway safety implications arising from these short flare lengths, particularly on the A299 exit arms. This serves to underline the need for all off-site mitigation proposals to be subject to an independent Stage 1 Road Safety Audit, which has not been completed. Swept path analysis should be undertaken to demonstrate that the three proposed circulatory lanes would operate safely. It is noted that the inter-visibility splay between the Manston Road (north) and Manston Road (west) arms of the signalised Manston Road / Spitfire Way junction layout proposed by the applicant falls outside of the highway boundary, which presents a highway safety risk. The alternative roundabout layout preferred by KCC is shown to provide full mitigation for the proposed development. It is noted that the proposed scheme of mitigation for the Manston Road / Hartsdown Road / Tivoli Road / College Road / Nash Road junction results in significantly increased queue lengths on the College Road approach relative to the baseline (with Local Plan) scenario. This would cause interaction with the Ramsgate Road / College Road / A254 / Beatrice Road junction to the north, which is unacceptable to the Local Highway Authority. As previously advised, the proposed scheme of mitigation for the Ramsgate Road / College Road / A254 / Beatrice Road junction would appear to result in a highly unconventional junction layout which is unlikely to be acceptable to the Local Highway Authority, not least due to the lack of 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 of this scheme.
Tr.2.30	KCC	<p>Junction 8: A28 / Park Ln / Station Rd (Three-Arm Mini Roundabout and Left in/Left out Priority Junction) Based on the new modelling undertaken, do KCC still disagree that mitigation is not required for Junction 8A?</p>	<p>Based on the outputs of the junction capacity assessment, KCC agrees that no mitigation is required beyond that contained within the TTS. This is however predicated on an appropriate contribution towards the Inner Circuit Route Improvement Strategy being agreed.</p>
Tr.2.33	The Applicant KCC	<p>Junction 26: Newington Road / Manston Road (Three-Arm Mini Roundabout) Table 6.36 shows that the 2039 With Development scenario improves average queues in the PM Peak (31 vehicles at Newington Road North) and AM Peak (9 vehicles at Manston Road). At this stage of the assessment no mitigation measures are taken into account. Explain why. In addition: Does KCC agree that no mitigation is required for this junction?</p>	<p>KCC agrees that no mitigation is required for this junction on the basis that the appropriate strategic model (i.e. the TSTM) has now been utilised by the applicant as the basis for the junction capacity assessment presented. This is however predicated on an appropriate contribution towards the Inner Circuit Route Improvement Strategy being agreed.</p>
Tr.2.34	KCC	<p>Junction 27: Newington Road / High Street (Three-Arm Mini Roundabout) KCC in response to the ExA First Written Question Tr.1.28 [REP3-139] stated: <i>"...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</i></p>	<p>KCC agrees that no mitigation is required for this junction on the basis that the appropriate strategic model (i.e. the TSTM) has now been utilised by the applicant as the basis for the junction capacity assessment presented. This is however predicated on an appropriate contribution towards the Inner Circuit Route Improvement Strategy being agreed.</p>

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		<p><i>and should be addressed, with the two junctions assessed within a network model.</i></p> <p>Given the new modelling data, does KCC agree that no mitigation is required for this junction?</p>
Tr.2.35	The Applicant KCC	<p>Junction 29: Manston to Haine Link Road / Haine Road / A256 (Four-Arm Standard Roundabout)</p> <p>Table 6.39 shows that the 2039 With Development scenario improves average queues in the PM Peak (5 vehicles at New Haine Road). At this stage of the assessment no mitigation measures are taken into account.</p> <p>Explain why.</p> <p>In addition:</p> <p>Does KCC agree that no mitigation is required for this junction?</p>
Tr.2.36	KCC	<p>Section 6.4 Site Access Assessments</p> <p>Sets out the proposed site accesses for the cargo facility, NGA, Passenger Terminal and NGA South Access Junctions.</p> <p>Does KCC accept the results, including the associated swept path assessments (Figures 6.1 to 6.3)?</p>
Tr.2.37	The Applicant KCC	<p>Table 7.1 Junction 2 (A299 / A256 / Cottington Link Rd (Four-Arm Standard Roundabout))</p> <p>This shows that with the mitigation scheme there will still be significant PM Peak Average Queues on the A256.</p> <p>Is a 'nil detriment mitigation scheme' considered acceptable in these circumstances? Provide justification.</p> <p>Furthermore, KCC's LIR [REP3-143] set out that:</p> <p><i>"Should the proposed scheme of mitigation for the A299 / A256 roundabout be taken forward, it will require refinement as the lane markings on the A256 northbound approach to the junction are potentially confusing and do not cater for right turning movements. The ARCADY assessment should be updated accordingly. Additionally, swept path analysis should be undertaken to demonstrate that the three proposed circulatory lanes would operate safely".</i></p> <p>The Applicant provided the following response to KCC's LIR, submitted for deadline 4 on 8 March 2019 [REP4-028]:</p> <p><i>"DMRB Volume 6 Section 2 Part 3 TD 16/07 states "8.28 The use of right pointing arrows on lane dedication signs or as markings on the road is not permitted on roundabout approaches (except at mini-</i></p>

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		<p>roundabouts). This is to avoid confusing drivers, particularly those from overseas, over which way to proceed around the roundabout. Where a right hand lane is dedicated to a specific destination, it should be associated with an ahead arrow on the approach. A right pointing arrow may be used on the circulatory carriageway." For this reason, no right turn arrow has been located on approach. That aside, lane marking will be refined through the detailed design process and as such are subject to change".</p> <p>The proposed mitigation in the RTA is consistent with that in the TA.</p> <p>Does KCC accept the Applicant's response on this matter?</p>
Tr.2.38	The Applicant KCC	<p>Table 7.2 Junction 4 (A299 / B2190 (Four-Arm Standard Roundabout))</p> <p>This shows that with the mitigation scheme there will still be significant AM Peak Average Queues at Tothill Street and the B2190(N) and PM Peak Average Queues at A299(W) with an RFC value of 1.00.</p> <p>Is a 'nil detriment mitigation scheme' considered acceptable in these circumstances? Provide justification.</p> <p>Furthermore, KCC's LIR [REP3-143] set out that:</p> <p><i>"It is not considered that the proposed schemes of mitigation for the A299 / B2190 and A299 / A253 roundabouts will deliver practical benefits to the capacity of the junctions, in view of the limited flare lengths proposed. There are potential highway safety implications arising from these short flare lengths, particularly on the A299 exit arms".</i></p> <p>The proposed mitigation scheme to Junction 4 has been revised in the RTA.</p> <p>Does this overcome KCC's concern?</p>
Tr.2.39	The Applicant KCC	<p>Table 7.3 Junction 6 (A299 / Seamark Rd / A253 / Willetts Hill (five-arm standard roundabout))</p> <p>This shows that with the mitigation scheme there will still be significant PM Peak Average Queues on the A253 Canterbury Rd with an RFC of 1.07.</p> <p>Is a 'nil detriment mitigation scheme' considered acceptable in these circumstances? Provide justification.</p> <p>Furthermore, KCC's LIR [REP3-143] set out that:</p> <p><i>"It is not considered that the proposed schemes of mitigation for the A299 / B2190 and A299 / A253 roundabouts will deliver practical benefits to the capacity of the junctions, in view of the limited flare lengths proposed. There are potential highway safety implications arising from these short flare lengths, particularly on the A299 exit arms".</i></p> <p>The proposed mitigation scheme to Junction 6 has been revised in the RTA.</p> <p>Does this overcome KCC's concern?</p>
Tr.2.40	The Applicant KCC	<p>Table 7.4 Junction 7 (A299 / A28 (Five-Arm Standard Roundabout))</p> <p>This shows that with the mitigation scheme there will still be significant AM Peak Average Queues on the A28 (East) and PM Peak Average Queues on A299 (West).</p> <p>Is a 'nil detriment mitigation scheme' considered acceptable in these circumstances? Provide justification.</p>
Tr.2.41	The Applicant	<p>Table 7.5 Junction 12 (Manston Road / B2050 / Spitfire Way (Four-</p> <p>i. The junction capacity assessments indicate that the two layout options would offer similar capacity benefit relative to the existing</p>

ExQ2	Question to:	Question:
	KCC	<p>Arm Staggered Priority Junction)</p> <p>i. Does this illustrate that a signalised layout is preferable to a roundabout layout (Table 7.6)? ii. Does it represent the best long-term solution? iii. Will the scheme of mitigation impact upon the footprint of the RAF Museum?</p> <p>Furthermore, KCC's LIR [REP3-143] set out that: <i>"The Local Highway Authority has significant safety concerns with the proposed scheme of mitigation for the B2050 / Manston Road / Spitfire Way junction, in view of the incorporation of uncontrolled right turns and intervisibility splays between arms which appear to cross third party land".</i></p> <p>The proposed mitigation scheme to Junction 12 has been revised in the RTA.</p> <p>iv. Does this overcome KCC's concern?</p> <p>junction layout.</p> <p>It is relevant to point out at this stage that the roundabout test is based on the geometrical layout of the existing 'Stone Hill Park' roundabout design. This design was intended to facilitate traffic flows associated with the Stone Hill Park, Mixed use development that is currently submitted to the Local Planning Authority - and not Aviation based development. This proposal is likely to generate very different traffic flow conditions at Spitfire Junction (Spitfire Way/Manston Road).</p> <p>Therefore, it may not be appropriate to use the same geometry as a direct comparable to the signal junction scheme, as theoretically, a different roundabout solution could be designed to accommodate the change in flow profile relating to the revised traffic routing from an alternative Manston Road to Haine Road link.</p> <p>ii. It is noted that the inter-visibility splay between the Manston Road (north) and Manston Road (west) arms of the signalised junction layout falls outside of the highway boundary, which presents a highway safety risk. KCC would also reiterate its previous concern regarding the incorporation of uncontrolled right turns within the junction intersection. The alternative roundabout layout is therefore preferred by KCC and will maintain route consistency as the junctions between Haine Road and A299 (Via Spitfire way) predominantly consist of roundabouts.</p> <p>iii. Both potential mitigation schemes (Signal and Roundabout) would have an impact on the footprint of the RAF Museum.</p> <p>iv. As per point ii above, KCC continues to have highway safety concerns with the scheme as presented in the TA Addendum. Furthermore, a Stage 1 Road Safety Audit of the scheme is yet to be completed.</p>
Tr.2.42	The Applicant KCC	<p>Table 7.7 Junction 15 (Manston Rd / Hartsdown Rd / Tivoli Rd / College Rd / Nash Rd (Five-Arm Signalised Junction))</p> <p>This shows that with the mitigation scheme there will be an increase in the AM Peak MMQ and DoS at College Road Lane 1 (3/1), with all arms of the junction still operating well over capacity. Is a 'nil detriment mitigation scheme' considered acceptable in these circumstances? Provide justification.</p> <p>Furthermore, KCC's LIR [REP3-143] set out that: <i>"Further information is required detailing how the apparently modest scheme of mitigation for the Manston Road / Hartsdown Road / Tivoli Road / College Road / Nash Road junction (comprising a new signal head and stage sequence and new white lining) will take the junction from significantly over-capacity operation to generally within capacity outside of the PM peak hour, as this is not considered plausible on the basis of the details provided".</i></p> <p>The proposed mitigation scheme to Junction 15 has been revised in the RTA.</p> <p>Does this overcome KCC's concern?</p> <p>The applicant's proposed scheme of mitigation results in significantly increased queue lengths on the College Road approach to the junction relative to the baseline (with Local Plan) scenario. This would cause interaction with the Ramsgate Road / College Road / A254 / Beatrice Road junction to the north, which is unacceptable to KCC.</p> <p>It is also relevant to note that this mitigation solution could not be implemented until other development sites were delivered as it relies on other road link infrastructure being in place to enable the Nash Road arm of this junction to be closed as traffic will need to reroute between Nash Road and Manston Road.</p>
Tr.2.43	The Applicant KCC	<p>Table 7.8 Junction 16 (Ramsgate Rd / College Rd / A254 / Beatrice Rd (Five-Arm Signalised Junction))</p> <p>With the exception of the A254 (SB) Ramsgate Road (9/1) and (9/2), this shows all arms of the junction still operating well over capacity. Is a 'nil detriment mitigation scheme' considered acceptable in these circumstances? Provide justification.</p> <p>KCC in response to the ExA's First Written Question Tr.1.27 [REP3-139] stated: <i>"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</i></p> <p>As previously advised, 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 KCC, not least due to the lack of intervisibility between the stop lines. Again, a Stage 1 Road Safety Audit will need to be submitted as part of any further justification of this scheme.</p>

ExQ2	Question to:	Question:	
		<p><i>between the stop lines</i>". The mitigation scheme for this junction does not appear to have altered in the RTA.</p> <p>What is the Applicant's response?</p>	
Tr.2.44	KCC	<p>Paragraph 7.3.4 - Spitfire Way/Alland Grange Road & Paragraph 7.3.6 Manston Road/Manston Court Road</p> <p>These propose mitigation schemes (Figures 7.8 & 7.9) to overcome highway safety concerns. Is KCC content with the mitigation schemes?</p>	<p>KCC is unable to comment until it is in receipt of Stage 1 Road Safety Audits for these mitigation schemes. Confirmation is also required from the applicant that they have the ability to implement the proposed scheme of mitigation to the Spitfire Way/Alland Grange Lane junction.</p>
Tr.2.46	The Applicant KCC	<p>Timing of Mitigation Works KCC in response to the ExA First Written Question Tr.1.31 [REP3-139] stated: <i>"...the Transport Assessment appears to set out no defined trigger points for the proposed mitigation strategy, which is not considered to provide adequate clarification or safeguarding over the proposed delivery timescales of any of the mitigation or works."</i> In response to this, the Applicant stated in their 'Comments on Third Party Responses to First Written Questions [REP4-029]': <i>"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".</i></p> <p>The RTA does not include such information. What is the latest position on this matter (including those schemes required to improve highway safety)?</p>	<p>The TA Addendum provides no further information or clarification on this matter, although KCC remains willing to engage with the applicant to progress these negotiations.</p> <p>This matter remains unresolved. The Highway Authority would look to seek all mitigation at the earliest possible juncture, unless the applicant can demonstrate an evidence-based approach to infrastructure triggers. In the absence of a clear evidence base, any agreed improvement schemes should be pre commencement/occupation triggers. Please note that at this stage, not all of the mitigation schemes are agreed by the Highway Authority.</p> <p>As has been noted, it is evident from the TA Addendum that many of the TTS interventions mitigate the impact of the proposed development and therefore an appropriate financial contribution will be sought from the applicant towards this strategy should the Development Consent Order be granted.</p> <p>In order to define this contribution, the applicant will be required to fund the completion of a revised apportionment exercise by KCC's specialist consultants, as the proposed development falls outside of the draft Local Plan for which the original exercise was completed.</p>
Tr.2.48	KCC	<p>Infrastructure requirements within the Thanet Transport Strategy KCC in response to the ExA First Written Question Tr.1.22 [REP3-139] stated: <i>"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".</i></p> <p>What is the Applicant's response?</p>	<p>The KCC as Highway Authority is in open dialogue with the applicant in relation to this matter, however a potential resolution has yet to progress further than initial discussion.</p> <p>For an apportioned cost for the DCO proposals in relation to the Thanet Transport Strategy to be calculated, it is necessary for the existing Local Plan study document 'Strategic Site Allocations Impact' to be updated to take into account the traffic impact from the proposed development. This document (referred to as Core Document 6.11) can be found on the Thanet District Council Local Plan webpage at the following web address. https://www.thanet.gov.uk/info-pages/local-plan-2031-examination/</p> <p>The applicant has yet to agree to this methodology or to underwrite the necessary costs associated with updating this document to reflect their development proposals. Therefore, this matter remains unresolved.</p>
Tr.2.56	The Applicant KCC	<p>Stage 1 Road Safety Audits</p> <p>For the proposed site accesses, are provided in Appendix J of the RTA.</p> <ol style="list-style-type: none"> It is set out that they do not include drainage information. Is this critical to the assessment? They include recommendations for works such as lighting and speed limits and swept path analysis. Are these provisions already included in the Proposed Development but not provided to the RSA team and have they been assessed in the ES? The RSAs suggest that signing details and swept path analysis were not provided. Given that Figures 6.1 to 6.3 of 	<ol style="list-style-type: none"> Drainage information is not considered to be critical to the safety audit process at this stage (Stage 1), however a further safety audit would be required at Stage 2 of the Section 278 highway agreement process (usually undertaken after a planning proposal has been determined), at which point more detail in relation to drainage will be required to be submitted and considered as part of the design process. If the safety audit recommends a change, then it is important for a comprehensive Designer Response to be produced. This is a matter for the applicant to address. This is a matter for the applicant to address. Swept path analysis should have been produced when the safety audit was considered. If these have not been considered by the audit team then this could potentially undermine any subsequent recommendations (as road geometry and how vehicles would

ExQ2	Question to:	Question:	
		<p>the RTA show this information, why was this the case? iv. Does KCC accept their findings?</p>	<p>negotiate the proposed layout is an important consideration within the process of a safety audit). It is recommended that the applicant seeks written clarification from the audit team that the swept paths were considered or that a subsequent review of the swept paths is undertaken.</p> <p>iv. KCC does not accept the findings at this stage, as the applicant has not included Designer's Responses to the issues raised by the Auditor. No speed data was provided in relation to the Terminal and Northern Grass access junction -as such, the audit team was unable to make fully informed recommendations in relation to scheme safety. Until the above matters have been clarified, KCC is not able to accept their findings.</p>
Tr.2.58	KCC	<p>Appendix B KCC Comments on Manston Airport TA This sets out several tables showing the Applicant's response to concerns raised by KCC.</p> <p>i. Does KCC wish to comment any of the information, particularly the latest iteration 'Technical note: Wood Response to Kent County Council Comments on Manston Airport TA. Version 3'?</p> <p>ii. Where it says agreement has been reached, is this the case in all instances?</p>	<p>KCC is generally content with the latest iteration of the Technical Note, which reflects the further dialogue that has taken place with the applicant's consultants since the DCO application was submitted. Agreement has been reached in the instances identified in the Technical Note.</p>
Tr.2.60	KCC TDC	<p>Framework Travel Plan Do KCC and TDC consider the updated draft Framework Travel Plan to be sufficiently robust and does it overcome KCC previous concerns?</p>	<p>As previously advised, the applicant will need to make more explicit commitments to provide specific measures to enhance the quality of non-car modes of travel at appropriate stages in the proposed development build out programme, including the re-routing and frequency enhancement of local bus services (informed by the advice of local operators) and the provision of new and improved walking and cycling routes to the site. The Draft Travel Plan continues to lack such detail, which casts doubt over the achievability of the mode share targets presented.</p>
Tr.2.65	KCC TDC	<p>Do KCC and TDC consider the updated Car Parking Management Strategy to be sufficiently robust?</p>	<p>As previously advised, it is unclear from the information made available by the applicant whether the passenger mode share assumptions applied in the Car Park Management Strategy align with those applied in the TA, as they are presented on an inconsistent basis.</p> <p>A balance should to be struck between maintaining the commercial attractiveness of the passenger facility and the encouragement of sustainable means of transport.</p> <p>Given the surrounding highway network is constrained and not subject to on street parking controls, it is prudent for adequate car parking spaces to be provided in line with the forecast demand, as this will assist in discouraging inappropriate parking on the surrounding highway.</p> <p>As the site is in a relatively isolated location, economically efficient on street parking enforcement may be challenging to deliver, which could have a bearing on the behaviour of road users. It would be more appropriate for the strategy/DCO to include a commitment to funding necessary monitoring (and implementation if deemed necessary) of a controlled parking zone around the site. It may also be necessary for Thanet District Council to introduce additional civil enforcement resource (Parking Wardens), as such discussion with TDC parking services team should also be sought to explore the feasibility and implications surrounding this issue.</p> <p>The calculated need for parking in section 2.2 would appear to be reasonable, however the justification for an overprovision of 1,151 spaces is currently insufficiently justified, although it would seem reasonable to make some allowance for peaks and troughs in parking demand. It is possible that this provision may also include an allowance for staff parking, however this point should be clarified by the applicant.</p> <p>The Car Parking Management Strategy provides no information of the level of charge for parking, which could be a key component in managing demand. Whilst it is difficult to set a specific monetary levy so far into the future, it is felt that parking charges should always be levied in such a way that the cost of private car travel will not then represent a cheaper option than comparable public transport options. Implications for Blue Badge Holders would also need to be considered.</p>
Tr.2.67	KCC TDC	<p>Do KCC and TDC consider the updated Airport Surface Access</p>	<p>The updated Airport Surface Access Strategy effectively summarises the contents of the TA and other supporting documents (e.g.</p>

ExQ2	Question to:	Question:	
		Strategy to be sufficiently robust?	the Framework Travel Plan and Car Parking Management Strategy) and therefore KCC would reiterate its outstanding issues and concerns with these documents in the first instance.
Revised Transport Environmental Statement chapter and Noise and Air Quality Technical Notes (5 April 2019) [REP5-022]			
Tr.2.70	KCC	Table 14.2 Summary of Traffic Surveys and Data Information Sets out that the traffic count surveys were undertaken in March 2017 and October 2017 and the locations these were undertaken are set out in Paragraphs 14.4.13 to 14.4.16. Do KCC accept the timing, locations and results of these surveys?	KCC is happy with the timing, locations and results of the surveys from a highway perspective.
Tr.2.71	The Applicant KCC TDC	Table 14.17 Summary of Highway Links Where Receptors Have Been Identified Illustrates highway links that contain sensitive receptors. i. What was the methodology applied to identify highway links and receptors identified? ii. Were these agreed with KCC and/or TDC? iii. Do KCC and TDC agree with highway links included?	KCC suggests that this best sits with Thanet District Council and their Environmental Health Team and would defer to them accordingly.
Tr.2.74	The Applicant KCC TDC	Paragraph 14.9.8 States: <i>"The links which have exceeded the percentage increase of traffic threshold for their respective sensitivity under the GEART guidelines have been identified based on the comparison between Scenarios 3 and 2".</i> i. Provide justification why it is considered appropriate to compare Scenarios 3 and 2 to assess the effects of the proposal. ii. Does the comparison of Scenarios 3 and 1 at Appendix 14.3 result in greater differences and potential effects? If so, explain why this should not be considered in the assessment. iii. Do KCC and TDC agree with the approach taken in this regard?	KCC suggests that this best sits with Thanet District Council and their Environmental Health Team and would defer to them accordingly.
Tr.2.75	TDC KCC	Section 14.10 Assessment of Effects This section sets out the assessment of effects for those links that are considered to need further assessment (Links 14, 15, 18, 20,21, 24, 25, 33, 34, 35 and 36, 37 and 38). Do TDC and KCC agree with the conclusions for each link?	KCC suggests that this best sits with Thanet District Council and their Environmental Health Team and would defer to them accordingly.