

# RSP

RiverOak Strategic Partners

## Public Rights of Way Management Strategy

TR020002/D11/PRWMS  
Examination Document

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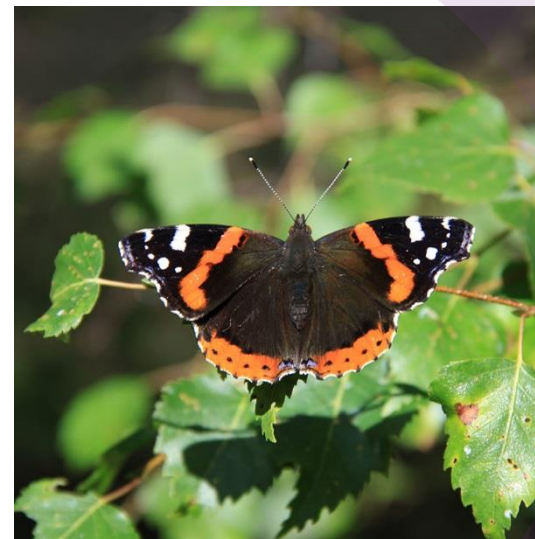
# RSP

**wood.**

RiverOak Strategic Partners Limited

## **Manston Airport DCO**

TA Appendix M - Public Rights  
of Way Management Strategy  
(PRoWMS)



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## Report for

George Yerrall  
RiverOak Strategic Partners  
Audley House  
London  
W1K 6WF

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## Main contributors

Aga Jezierska  
Glyn Price

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## Issued by

PP  
.....  
Aga Jezierska

---

## Approved by

.....  
Glyn Price

---

## Wood

Canon Court  
Abbey Lawn  
Abbey Foregate  
Shrewsbury SY2 5DE  
United Kingdom  
Tel +44 (0) 1743 342 000

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## Document revisions

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1	First Draft	14/11/2017
2	Second Draft	11/01/2018
3	FINAL DRAFT	12/03/2018
4	Final	27/03/2018
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Appendix A Site visit undertaken on 31 October 2017 - Meeting minutes



# 1. Introduction

## 1.1 Background

- 1.1.1 RiverOak Strategic Partners Limited (hereafter referred to as 'RiverOak') is seeking to secure the future of Manston Airport (the 'Proposed Development') as a valuable regional and national asset by re-developing the site as a freight airport. The proposals will provide much needed additional air freight capacity to the United Kingdom and serve to relieve pressure from other, already heavily congested, London and South East airports.
- 1.1.2 Under the *Planning Act 2008*<sup>1</sup> (the '2008 Act') the re-development of Manston Airport as a freight airport is considered a Nationally Significant Infrastructure Project (NSIP). RiverOak is making an application under the 2008 Act for a permission known as a 'Development Consent Order' (DCO) to reopen and operate Manston Airport. The application will be submitted to the Planning Inspectorate which will examine it and make a recommendation to the Secretary of State for Transport, who will then make a decision on whether the Proposed Development is granted consent.
- 1.1.3 This Public Right of Way Management Strategy (PRoWMS) is one of a suite of reports which have been produced in the support of the DCO application. This PRoWMS is included as Appendix M of the Transport Assessment.
- 1.1.4 This version of the document has been updated to take into account comments received by Kent County Council (KCC) on the version of this document submitted with the DCO Transport Assessment (TA) in July 2018 and add in commitments to upgrade TR10.

## 1.2 Overview

- 1.2.1 The site is located approximately 4km to the west of Ramsgate and 5km south of Margate in the district of Thanet, East Kent and covers an area of approximately 303.2ha.
- 1.2.2 The site has provided a variety of operational airport-related services since 1916. Until 1998 it was operated by the Royal Air Force (RAF) as RAF Manston, and for a period in the 1950s was also a base for the United States Air Force (USAF).
- 1.2.3 From 1998 it was operated as a private commercial airport, known as Kent International Airport. The airport offered a range of services including scheduled passenger flights, charter flights, air freight and cargo, a flight training school, flight crew training and aircraft testing. In recent years it was operating as a specialist air freight and cargo hub servicing a range of operators. Although the airport was closed in May 2014 much of the airport infrastructure remains.
- 1.2.4 The Proposed Development shall consist of the following principal components, as shown in **Figure 1.1** of Volume 4 of the Environmental Statement (ES):
- Runways and taxiways suitable for the take-off and landing of a broad range of cargo aircraft;
  - New aircraft stands;

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<sup>1</sup> The Planning Act 2008, [online]. Available at: <https://www.legislation.gov.uk/ukpga/2008/29/contents> [Accessed: 27/03/2019].

- An area for cargo freight operations able to handle at least 10,000 movements per year and associated infrastructure, including;
  - ▶ a new Air Traffic Control (ATC) tower;
  - ▶ a rescue and fire station;
  - ▶ a fuel farm; and
- Facilities for other airport-related development, including:
  - ▶ a passenger terminal and associated facilities;
  - ▶ an aircraft teardown and recycling facility;
  - ▶ a flight training school;
  - ▶ a base for at least one passenger carrier;
  - ▶ a fixed base operation for executive travel; and
  - ▶ business facilities for airport related organisations.

1.2.5 As set out in detail in Chapter 2 of this Report, there are two PRowWs that are affected by the Proposed Development, for which a strategy is identified.

## 1.3 Consultation

1.3.1 The PRow Officer for Kent County Council (KCC) has been consulted regarding the affected PRow and the proposed strategy.

1.3.2 A joint site visit was undertaken on 31 October 2017 by Wood and the KCC East Kent Area Officer for PRow & Access Service. This was followed up with a series of email exchanges and telephone conversations. The existing PRow network close vicinity to the site was discussed and it was confirmed that the KCC online record of the network is up to date and formed the basis of discussions on the existing conditions and possible proposals.

1.3.3 Notes of the discussion during the joint site visit are included in **Appendix A** to this report. The content of the notes is a narrative of the discussions at the time and the details set out about securing the PRow amendments and time frames are not applicable as these will be secured through the DCO.

## 1.4 Structure of the PRowMS

1.4.1 The remainder of this PRowMS is set out as follows:

- **Chapter 2: PRow Assessment**, identifies all PRow that are affected by the Proposed Development and the nature of the impact;
- **Chapter 3: Proposed Changes to PRow** discusses any proposed mitigations; and
- **Chapter 4: Summary and Conclusions** summarises the proposals and concludes on the impact of the Proposed Development.

## 2. PRow Assessment

### 2.1 Introduction

- 2.1.1 A right of way is a path on which the public have a legally protected right to pass and re-pass and are known as a 'public' right of way (PRow). There are four types of PRow:
- Footpaths – for use only by pedestrians;
  - Bridleways - for pedestrians, horse riding and cycling;
  - Restricted byways - for any transport that does not have a motor; and
  - Byways open to all traffic - for any kind of transport, including cars, but mainly used by walkers, cyclists and horse riders.
- 2.1.2 Definitive maps of PRow have been compiled for all of England and Wales, as a result of the *Countryside and Rights of Way Act 2000*<sup>2</sup>. Local highways authorities are required to maintain the definitive map of all PRow in their areas, which are publicly available to view. Changes to a PRow requires a legal order application to be made to the local highway authority. Public Path Diversion or Extinguishment Orders are dealt with by the *Highways Act 1980*<sup>3</sup>, or the *Town and Country Planning Act 1990*<sup>4</sup> if it is to enable development to take place.

### 2.2 Study Area

- 2.2.1 **Figure 2.1** shows the PRow within and adjacent to the red line boundary of the Proposed Development. It identifies two PRow to the east of the site that are affected by the Proposed Development.
- 2.2.2 The affected PRows are TR8 and TR9, both of which are bridleways. TR8 will be impacted by the proposed extension of the car park, while TR9 will fall within the red line boundary of land north of the proposed runway.
- 2.2.3 **Figure 2.2** shows the sections of the PRow which are affected by the Proposed Development. This figure illustrates how each of these PRow is further split into smaller sub sections, indicated with an orange dot.
- 2.2.4 Between Manston Road and Bush Farm, TR8 is split into five sub sections in KCCs PRow identification numbers. The sections start from the point where it exits Manston Road (TR8/1) and then runs south and then east through the remaining sections to TR8/5.
- 2.2.5 TR9 is split into two sub sections. The first, TR9/1 is between the public highway and the link TR10. The second, TR9/2 is between the link TR10 and the termination point inside Manston Airport's existing boundary.

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<sup>2</sup> Countryside and Rights of Way Act 2000, [online]. Available at: <https://www.legislation.gov.uk/ukpga/2000/37/part/1/chapter/1/crossheading/rights-and-liabilities-of-owners-and-occupiers> [Accessed: 27/03/2019].

<sup>3</sup> Highways Act 1980, [online]. Available at: <https://www.legislation.gov.uk/ukpga/1980/66> [Accessed: 27/03/2019].

<sup>3</sup> Town and Country Planning Act 1990, [online]. Available at: <https://www.legislation.gov.uk/ukpga/1990/8/section/73> [Accessed: 27/03/2019].



2.2.6 All affected PRow in the study area are summarised in **Table 2.1**.

**Table 2.1** Summary of PRow affected by the proposed development

ID No	PRow No	Type of PRow	Extent of the impact on PRow
1	TR8/2	Bridleway	The bridleway falls partially within the Proposed Development.
2	TR8/3	Bridleway	The bridleway falls within the Proposed Development.
3	TR8/4	Bridleway	The bridleway falls within the Proposed Development.
4	TR8/5	Bridleway	The bridleway falls within the Proposed Development.
5	TR9/2	Bridleway	The bridleway falls partially with the existing boundary which is planned to remain as part of the Proposed Development.

## 2.3 Description of Affected PRow

2.3.1 In order to gain a thorough understanding of the affected PRow, a site visit was undertaken on 31 October 2017 with KCC's East Kent Area Officer for the PRow & Access Service.

2.3.2 Follow up conversations with the East Kent Area Officer also established agreement on the widths of the PRow, while the lengths were obtained from the KCC online mapping for PRow.

2.3.3 The characteristics of the local PRow to the site are described in **Table 2.2**.

**Table 2.1** Characteristics of the affected PRow

	Length [m]	Width [m]	Features
<b>TR8/1</b>	20	2.1-3.0	Field-edge path with a fingerpost/timber- plastic finger (fingerpost) at the start of TR8.
<b>TR8/2</b>	141	2.1-3.0	Field-edge path.
<b>TR8/3</b>	46	2.1-3.0	Field-edge path.
<b>TR8/4</b>	298	2.1-3.0	Path running across a field.
<b>TR8/5</b>	381	2.1-3.0	Path running across a field marked with a fingerpost/metal- metal finger (fingerpost) at the end of TR8.
<b>TR9/1</b>	185	Not on record	A section of tarmacked path followed by a section of bare ground leading towards a farmed land. Last section of TR9/1 is formed by a field-edge path. Fingerpost/metal- metal finger (fingerpost) marks the start of TR9 and is located on the footway, outside 38 High Street.
<b>TR9/2</b>	146	Not on record	Field-edge path consisting a fingerpost/metal- metal finger (fingerpost) marking the start of TR10, located north of the overgrown section of TR9.

2.3.4 Detailed descriptions of the routes are as follows:

- TR8 runs diagonally east to west from a point marked with a metal fingerpost at the eastern end of the PRoW (TR8/5). It then runs north alongside the existing Manston Airport perimeter fence, continuing north to where it meets the B2050 Manston Road (TR8/1). It was observed during the joint site visit that, the public do not generally follow the link, but walk along the Manston Airport fence instead. During the site meeting, it was agreed that this may be due to the alignment of the existing features such as the field boundary, the alignment of the existing Manston Airport perimeter fence and that the existing line of the PRoW across agricultural field is not appropriate at certain times of the year.
- During the site visit, it was observed that TR9 effectively ends at the point where it meets TR10. South of this point, the section of TR9 which is shown on KCC and Ordinance Survey plans is currently overgrown with dense vegetation. The denseness of the vegetation suggests that this section of route beyond the connection with TR10 has not been used for a prolonged period of time. The short section of TR9 that extends into the site is inaccessible due to the perimeter fence.

2.3.5 During the site visit with the KCC officer, a local resident who identified that he had lived in the area for over 30 years and was a regular dog walker in the locality, shared his knowledge of the PRoW network and usage habits in the vicinity of the study area. His comments are summarised below:

- Many dog walkers come to the area from further afield and exercise their dogs along TR8, TR9 and TR10 links;
- Local and visiting dog walkers usually walk a circular route/ loop to bring them back to their starting point to get back to their parked cars; and
- Route choice greatly depends on the time of the year and crop production, as high crops restrict walking or running along the links along and/or across fields. This however, was later commented on by Heather Waller, The east Kent Area Officer-Public Rights of Way & Access Service for KCC, who confirmed that it is KCC's responsibility to maintain routes so they are accessible all year round.

2.3.6 The resident confirmed, as observed by the KCC officer, that the TR8 link is not used as designed; instead users walk along the Manston Airport fence line instead. He also confirmed, that the section of TR9 link between the link TR10 and the Manston Airport fence, is not used and is unlikely to be known to any users.

2.3.7 PRoW width requirements are set out in the *Rights of Way Act 1990*<sup>5</sup> which states that:

- The "minimum width" is as respects a bridleway which is not a field-edge path, 2m, or as respects any other highway, 3m; and
- The "maximum width" is as respects a bridleway, 3m.

2.3.8 Existing TR8 and TR9/2 links are below the recommended width of 3m. The width of TR9/2 had not been recorded by KCC. However, the KCC Officer confirmed it to be substandard during the joint site visit.

2.3.9 The key characteristics of links TR8 and TR9 can be seen in **Figure 2.3**, while **Figures 2.4** and **2.5** provide captioned photographs of the PRoW. **Figure 2.6** identifies the locations where the photographs were taken.

<sup>5</sup> Rights of Way Act 1990, [online]. Available at: <http://www.legislation.gov.uk/ukpga/1990/24/contents> [Accessed: 27/03/2019].

Figure 2.4 Photographic Record of TR8 observed on site





Figure 2.5 Photographic Record of link TR9 observed on site



## 2.4 Thanet Parkway Connection Proposals

2.4.1 The KCC Officer noted that as part of the Thanet Parkway Station proposals, there is a strategy to create a new link between the station and TR9, as shown in **Figure 2.7**.

2.4.2 This proposal is considered further in **Section 3.4**.

## 2.5 Conclusions

2.5.1 The analysis of the links affected by the Proposed Development indicate the following:

- Existing TR8/2 link will partially remain until the point where it links with the Proposed Development's new perimeter fence. The remaining section of TR8/2 link will need to be diverted around the new proposed boundary fence;
- Existing links TR8/3, TR8/4 and TR8/5 will need to be diverted around the new proposed boundary fence; and
- Existing TR9/2 link will remain until the point where it links to the existing Manston Airport fence line. The remaining section of the TR9/2 link that currently falls within the airport boundary will need to be extinguished.



## 3. Proposed Changes to PRow

### 3.1 Introduction

3.1.1 This chapter sets out proposals for TR8, TR9 and TR10 as part of the Proposed Development which have been discussed with Kent County Council (KCC).

### 3.2 Summary of Discussions with Kent County Council

3.2.1 As set out in **Section 1.3**, the KCC East Kent Area Officer for Public Rights of Way (PRow) & Access Service has been consulted regarding the Proposed Development. A summary of the key points that were discussed is as follows and this is included as Appendix A to this report:

- Existing TR9 which currently leads into the perimeter fencing of Manston Airport historically led further south, but since Manston Airport was built, most of the route within the boundary was extinguished, however, a short section remained, but is inaccessible.
- Existing links TR8 and TR9 are planned to be widened to a desired minimum width of 3m. Similarly, this is suggested in the emerging Thanet Local Plan to be funded through the Section 106 Agreement, should the Proposed Development (or an alternative development) be granted planning permission; and
- KCC requested that PRows are to be created and funded under a Section 106 Agreement and would be maintained by KCC while remaining part of Manston Airport land. It should be noted however, that the power to undertake any mitigation work required would be established under the powers of the Development Consent Order (DCO). This PRow Management Strategy will be taken forward post permission and used as a basis for on-going discussions between KCC and the appointed Contractor, prior to commencement of the works. This will ensure that final plans can be agreed upon.

3.2.2 Although paragraph 3.2.1 sets out a narrative of initial discussions held with the PRow Officer, it should be noted that the last bullet point does not reflect the proposals for securing the PRow amendments. A Section 106 Agreement is not applicable as amendments will be secured through the DCO.

3.2.3 In addition to this consultation further discussion over links from the airport to the east were undertaken with KCC during the Examination process. It was agreed that it would be important to provide a good standard pedestrian route from Manston Village as well as the Proposed Manston Green Development and the Haine Road corridor.

### 3.3 Detailed Mitigation Proposals

3.3.1 Each of the affected PRow has been considered and a permanent mitigation proposal to address the impact is set out in the **Table 3.1**. This table also provide details for the proposals to upgrade TR10.

Table 3.1 Proposed detailed mitigation measures

	Approximate Length (M)	Proposed Mitigation
TR8	517m	TR8 will be rerouted along the edge of the perimeter fence of the Proposed Development. The route will remain as it is until it forced off line onto a new alignment along the fence. 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 commence.  The width of the bridleway will be 3m and it is proposed to run alongside a hedgerow planted east of the fence to allow for screening of the car park and the site. Any way marking posts or other PRoW infrastructure will be replaced and moved as and where necessary.
TR8	271.8m	TR8 will be upgraded on the sections where the route is not diverted.
TR9	73m	TR9 will be extinguished south of the perimeter fence of Manston Airport so that no PRoW falls within the site.
TR10	666m	TR10 will be upgraded between TR9 and the edge of the Manston Green Development.

3.3.2 The Masterplan has been designed to include a 5m wide corridor between the airport fence line and edge of the project order limit to incorporate the diverted TR8 (refer to **Figure 3.1**). This 5m corridor will incorporate the 3m wide bridleway and any appropriate screening.

3.3.3 Upgraded PRoW will be by resurfacing with compacted type one (passing 37.5mm sieve) to 100mm depth with 15mm thickness of 4mm to dust limestone fines.

### 3.4 Consideration for Thanet Parkway Connection

3.4.1 In addition to the two proposals (**Table 3.1**), the provision of a new link from TR9 to the proposed Thanet Parkway Station across or around the edge of the site cannot be provided as part of the Proposed Development.

3.4.2 A link across the site would present a security and safety risk, as it would cross the runway, taxi ways and other operational infrastructure. It is industry standard approach to restrict only security checked members of staff or passengers onto the airport apron. Therefore, PRoW directly crossing a site such as this is wholly inappropriate.

3.4.3 The alternative route would be long and run along the eastern side of the site. It would likely follow the proposed boundary fence, potentially making it unattractive to users due to its positioning in addition to its length. The length would be around 3.5km assuming a route as follows;

- ▶ Internal airport paths to the B2050;
- ▶ B2050 to start of TR08;
- ▶ TR08 on new Alignment then joining new path that would route around the edge of the Airport Land holding to the east;
- ▶ At the south of the Airport the route would then follow Windsor Road;
- ▶ At the end of Windsor Road users would join Canterbury Road West;
- ▶ Users would then route south through Cliffend on Foads Hill; and

- ▶ From Foads Hill it is assumed some new infrastructure would be required to access the Parkway Station.

- 3.4.4 If such a route could be proposed it would be at a distance of 3.5km to 4km which is well outside acceptable walking distances for staff and with the added luggage requirements for most passengers not appropriate for passengers. Walking distances for staff to the cargo facility and Northern Grass area would be significantly longer still at 4.5km – 6km.
- 3.4.5 However, KCC requested that Wood consider this desire for a route of this nature and as such Wood consulted with aviation experts Osprey CSL, a specialist technical company offering independent consultancy exclusively on aviation projects. Osprey CSL identified the following issues with positioning a PRoW along an airport perimeter fence:
- It attracts spotters, who are likely to take up residence close to the fence line. This in turn creates an additional security issue, which Manston Airport and local police would have to manage and mitigate;
  - Extra patrols, CCTV etc. would be needed to reach the difficult locations where vehicles cannot easily gain access;
  - There is a risk of infrastructure damage in locations where it is close to any Communication, Navigation & Surveillance (CNS), approach lighting and more;
  - It may infringe on existing private land outside the boundary fence which could require a double line of fencing; and
  - There is the long-term issue of future expansion, or need for infrastructure space, which could be inhibited by PRoW constraints.
- 3.4.6 Osprey CSL's recommendation was to reduce the presence of PRoW near the Proposed Development boundary (and CNS). PRoW should not be provided within the boundary of the Proposed Development. For that reason, no new links are proposed around the eastern boundary of the Proposed Development.
- 3.4.7 Furthermore, due to the design of the Proposed Development, including components such as the Fuel Farm, and the housing estate off King Arthur Road, creating the link set out in emerging local plan would likely require third party land outside the redline of the Proposed Development.
- 3.4.8 Finally, this link would also require additional infrastructure and paths along roads currently not catered with pedestrian facilities and a new link which may be hard to achieve from Foads Hill.
- 3.4.9 As a result, this link cannot be progressed within the proposals this report is being prepared to support.
- 3.4.10 However, if in the future it was likely that the Thanet Parkway Station were be built, there will consideration of bus connectivity between the station and Manston Airport, providing a sustainable north-south link.
- 3.4.11 An overview of the proposed mitigations is shown in **Figure 3.2**.

## 4. Summary and Conclusions

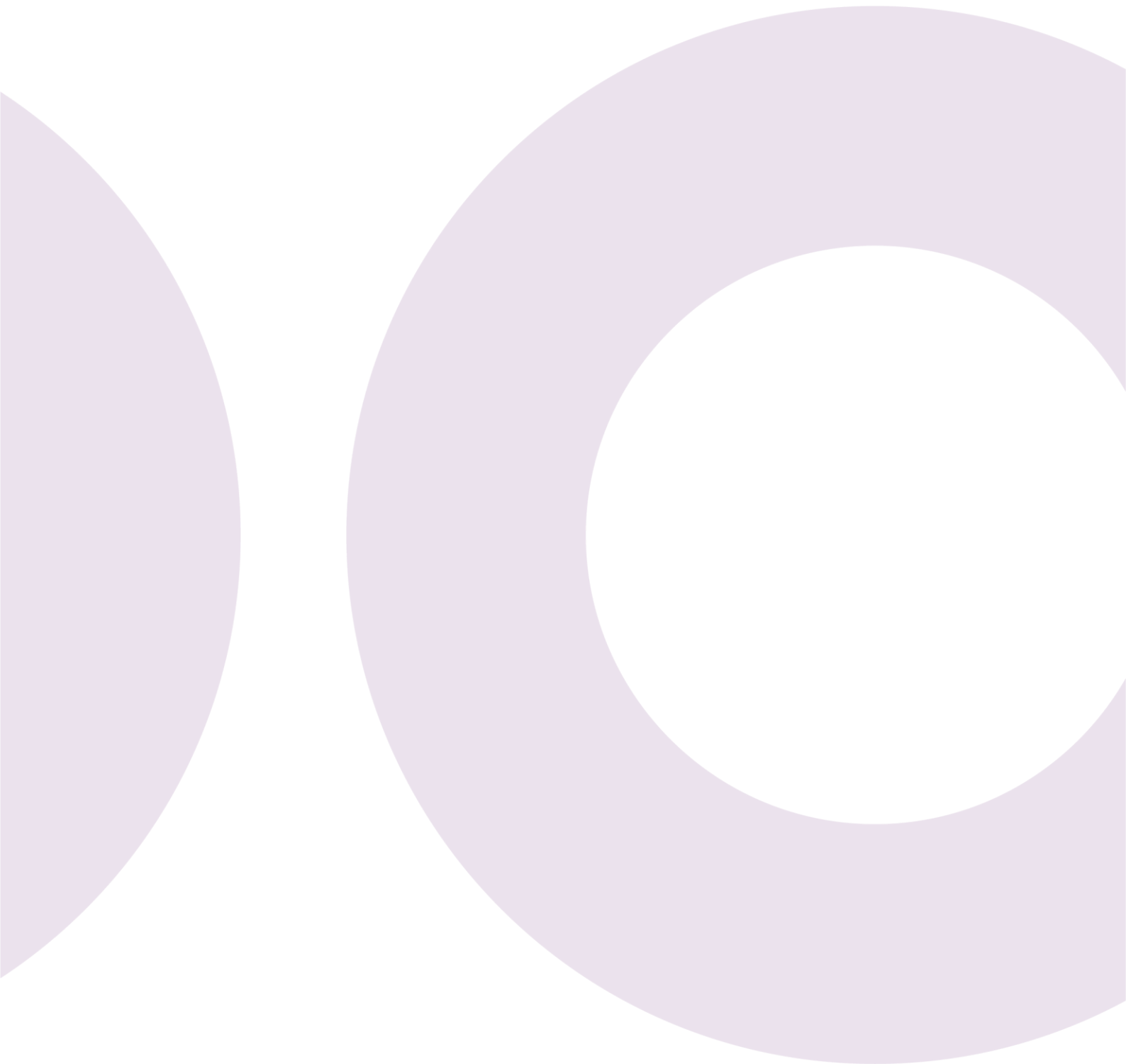
- 4.1.1 The Proposed Development will require an extension of the existing car parking located south of B2050 Manston Road, near the eastern site boundary. It is also assumed that the current site boundary between High Street and the existing runway will remain as shown in **Figure 2.1**. As a result, two Public Rights of Way (PRoWs) will be affected, TR08 and TR09.
- 4.1.2 A joint site visit was undertaken on 31 October 2017 with the Kent County Council (KCC) East Kent Area Officer for PRoW & Access Service, which was followed up with a series of email exchanges, telephone conversations and confirmation of the KCC online PRoW records. These were used as the basis of the proposed mitigation measures. Feedback from a local resident who regularly uses the PRoW links was also considered.
- 4.1.3 Wood also consulted with aviation experts, Osprey CSL, who are a specialist technical company offering independent consultancy exclusively on aviation projects. Their comments and suggestions were noted and accounted for in the PRoW Management Strategy.
- 4.1.4 The following mitigation measures are proposed to address the impact of the Proposed Development on the affected PRoWs:
- TR8 will be diverted along the edge of the new boundary fence of the Proposed Development. The route will remain as it currently is, until it is diverted onto a new alignment along the fence. The previous route will be permanently extinguished, and the new route permanently established. This will be done early in the project life cycle so it is established before major works commences;
  - The width of the diverted TR8 bridleway will be increased to 3m and it is proposed it will run alongside a hedgerow planted east of the fence to allow for screening of the car park and site. Any way marker posts or other PRoW infrastructure will be replaced and relocated as appropriate;
  - Where TR8 is not diverted the surface will be upgraded and resurfaced to a width of 3m wide;
  - TR9 will be extinguished south of the boundary fence of Manston Airport so that no PRoW falls within the red line boundary of the site; and
  - TR10 will be upgraded to a surfaced route between TR9 and the edge of the proposed Manston Green Development.
- 4.1.5 The proposed mitigations take into account the existing habits of PRoW users, as well as aiming to maintain the function of the links affected.
- 4.1.6 Creation of a new link around the eastern boundary of the Proposed Development will not be progressed. This, however, could be addressed by a bus service providing a north- south link, should the planned Thanet Parkway Station go ahead.
- 4.1.7 Amendments to the PRoW will be secured through the Development Consent Order and funds have been identified within the Section 106 agreement based on funding methodologies provided by KCC.



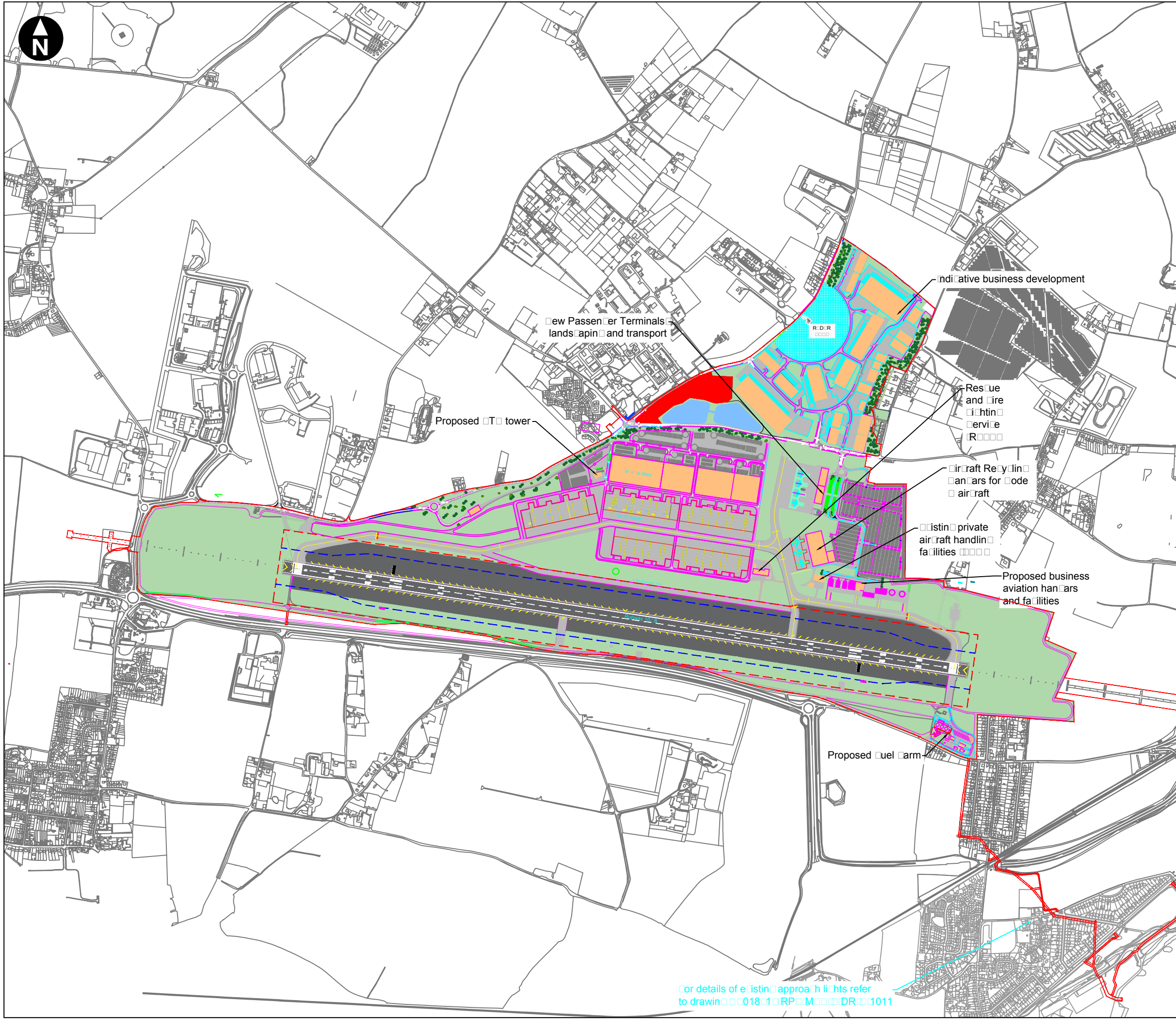
# **Appendix A**

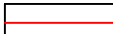
## **Site visit undertaken on 31 October 2017 - Meeting minutes**

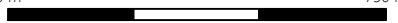
**wood.**



# Figures



Key  
 Order Limits

0 m  750 m  
 Scale 1:15,000 @ A3

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Client  


Manston Airport DCO  
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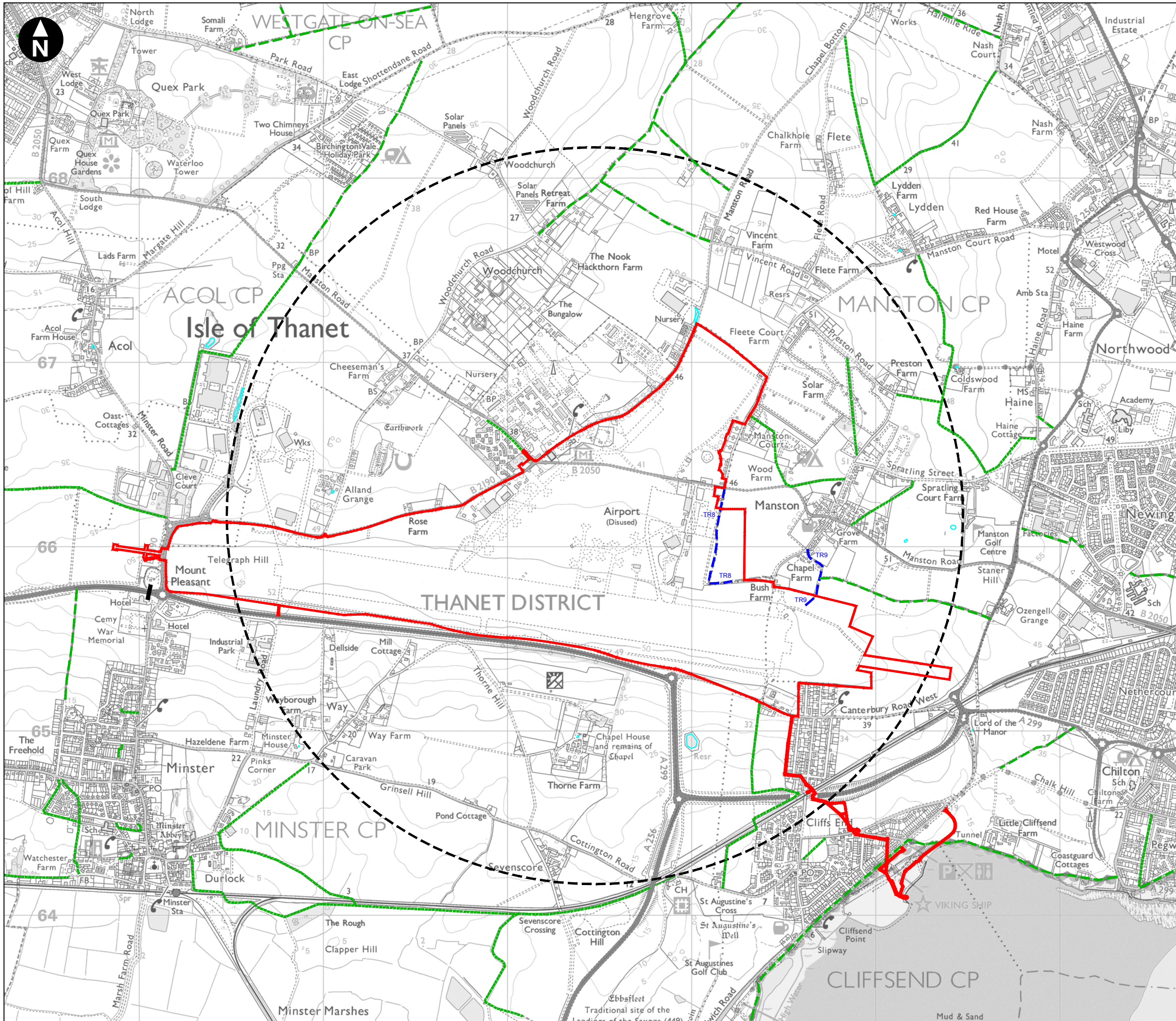
**Figure 1.1**  
**Proposed site layout**

March 2019



For details of existing approach lights refer to drawing 0181 RPRM DR 1011





Key

- Application Boundary
- Affected PRoW
- Public Footpath
- Public Bridleway

0 m 1000 m  
Scale 1:20,000 @ A3  
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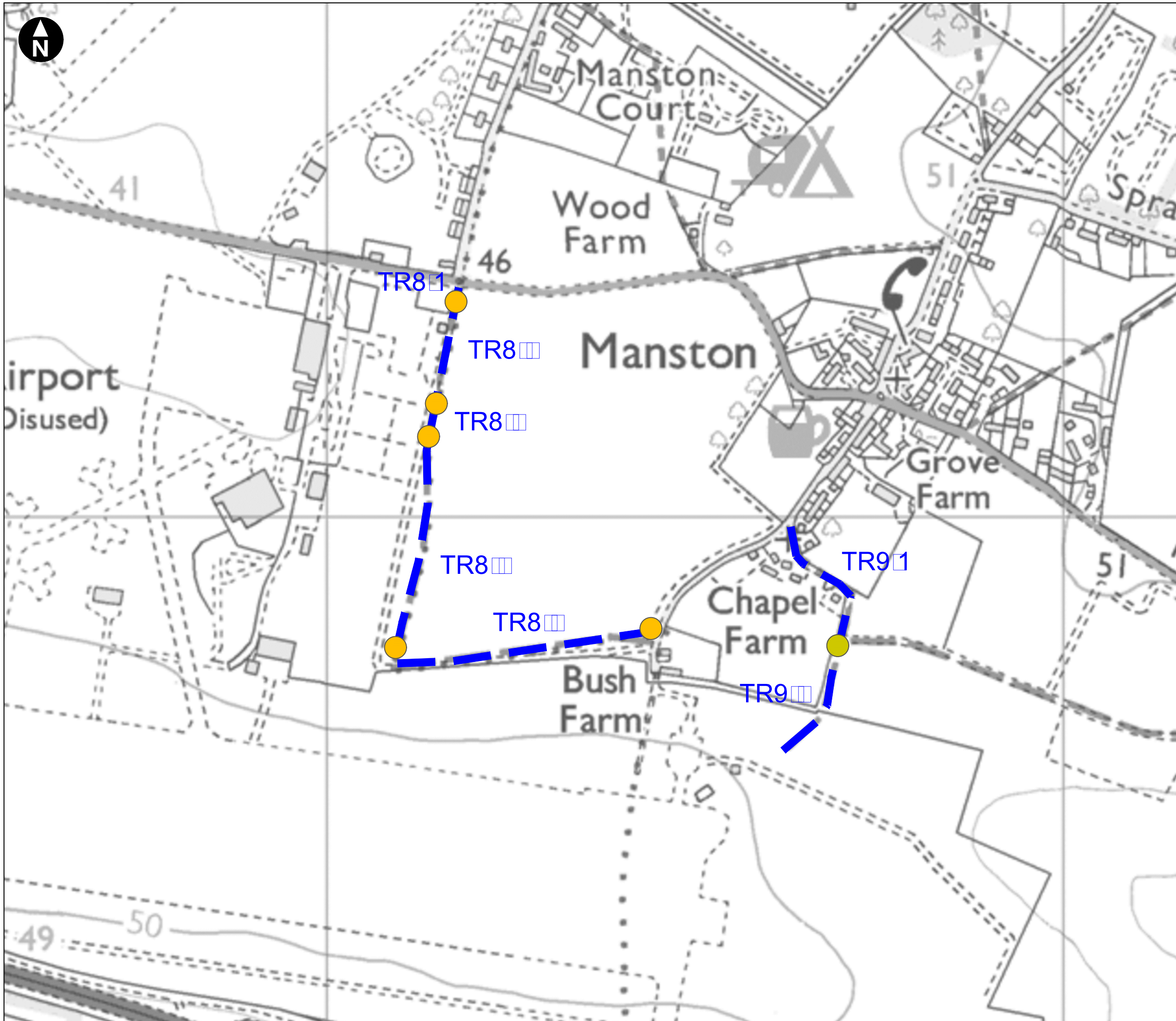
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**Figure 2.1 PRoW around Manston Airport**

March 2019





Key

- Affected PRoW
- PRoW Sections

0 m 300 m  
 Scale 1:5000 @ A3

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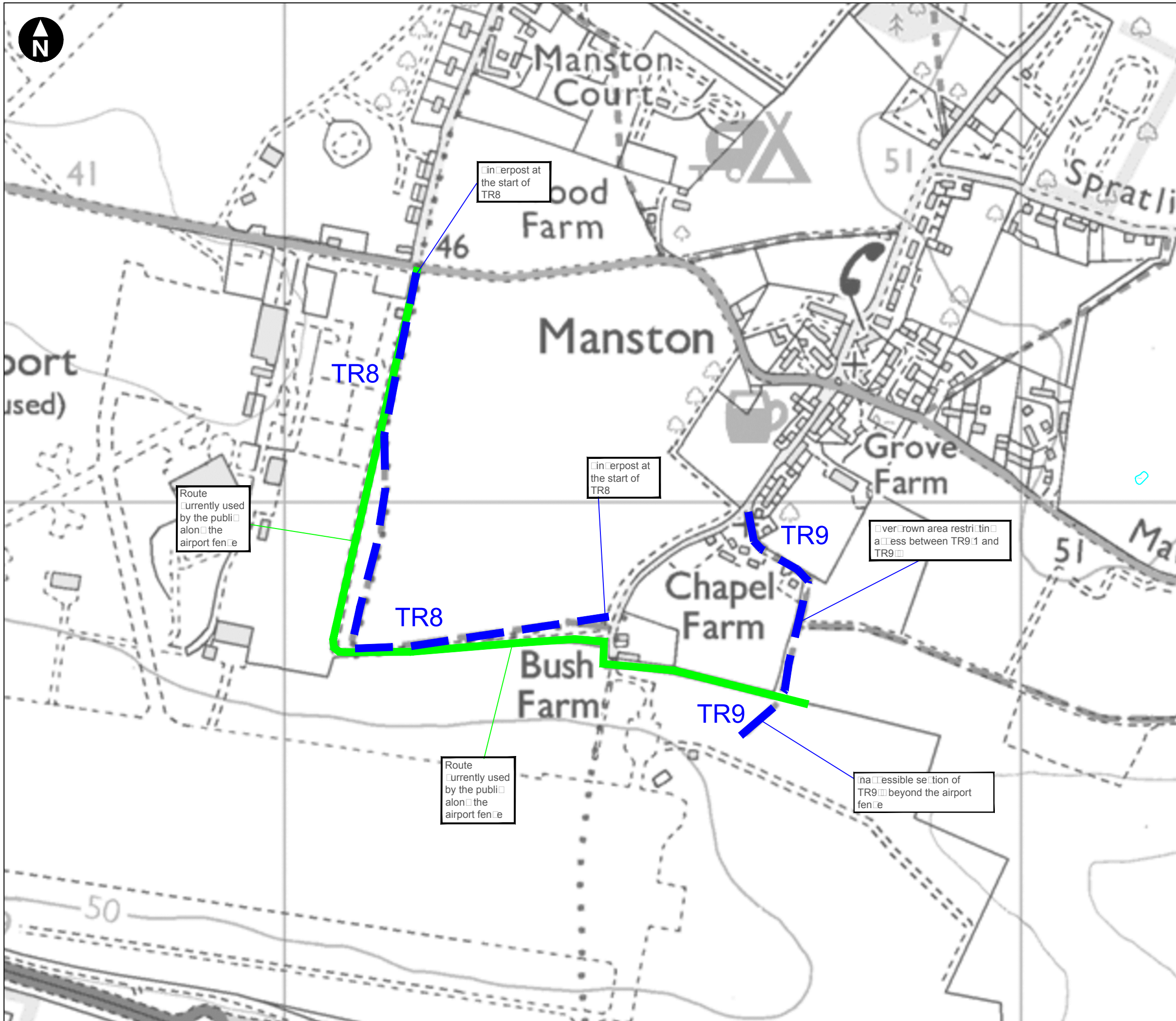


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**Figure 2.2**  
**Affected PRoW sections**



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Key

- Airport Fence
- Affected PRoW

0 m 300 m  
Scale 1:5000 @ A3

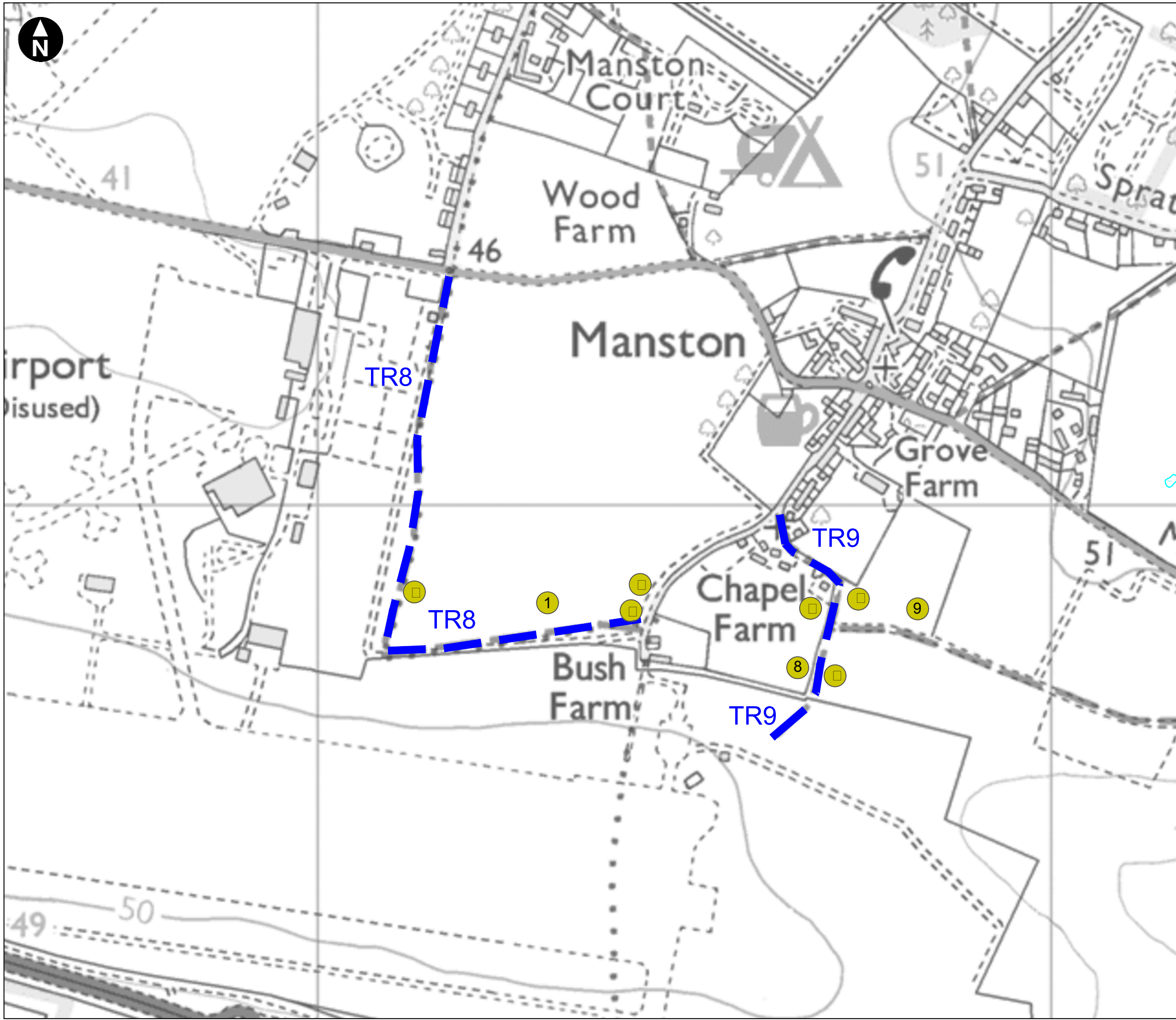
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**Figure 2.3**  
Key characteristics of Link TR8 and TR9





Key

- Affected PRoW
- 1 Photograph Locations

0 m 300 m  
 Scale 1:5000 @ A3

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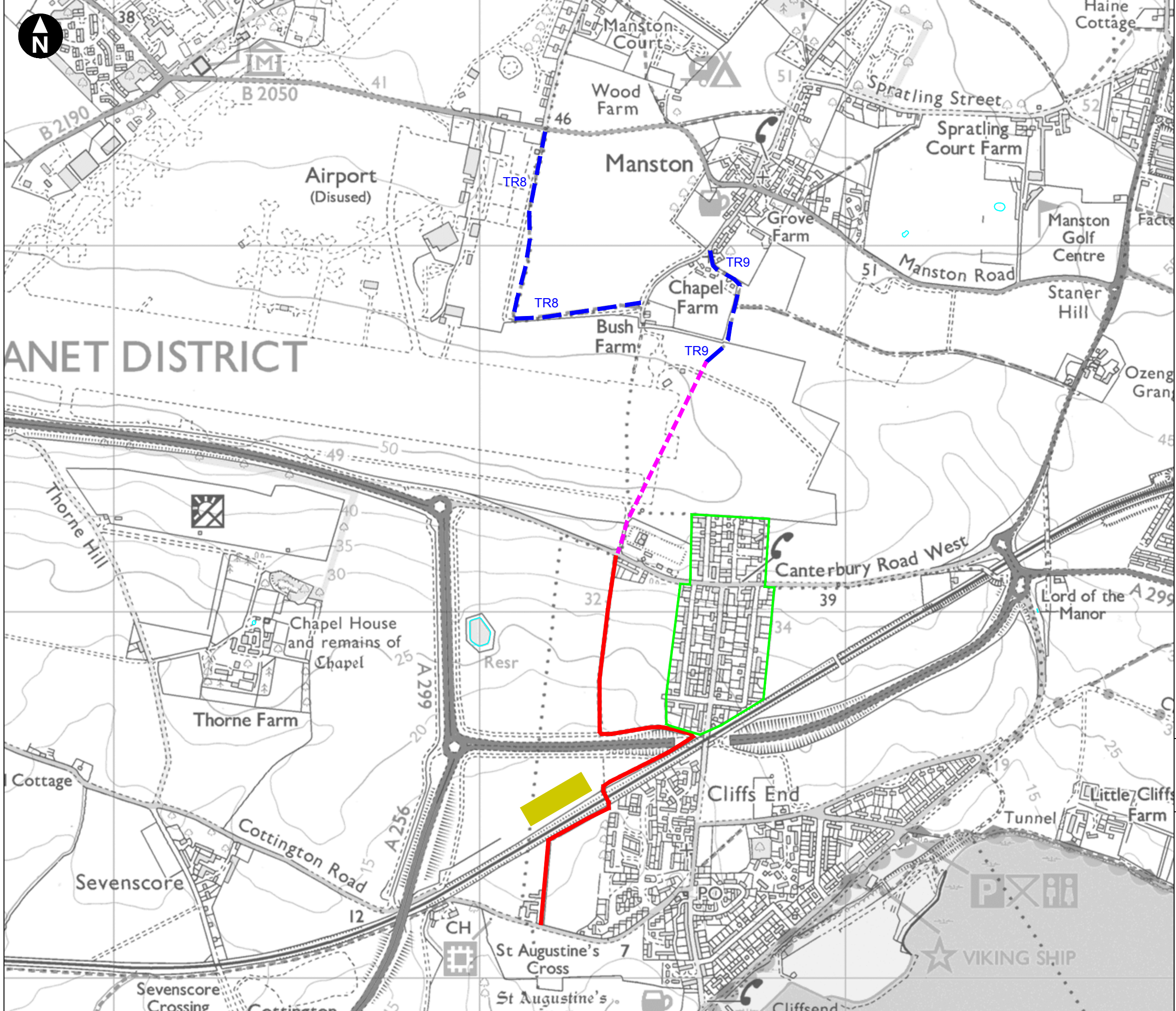
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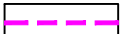
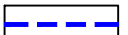
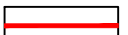

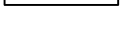
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**Figure 2.6**  
**Overview of all photographs shown in**  
**figures 2.4 and 2.5**



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- Key
-  Proposed new link
  -  Affected PRoW
  -  Existing footpath
  -  Planned Thanet parkway railway station
  -  Existing housing development

0 m 500 m  
 Scale 1:10,000 @ A3  
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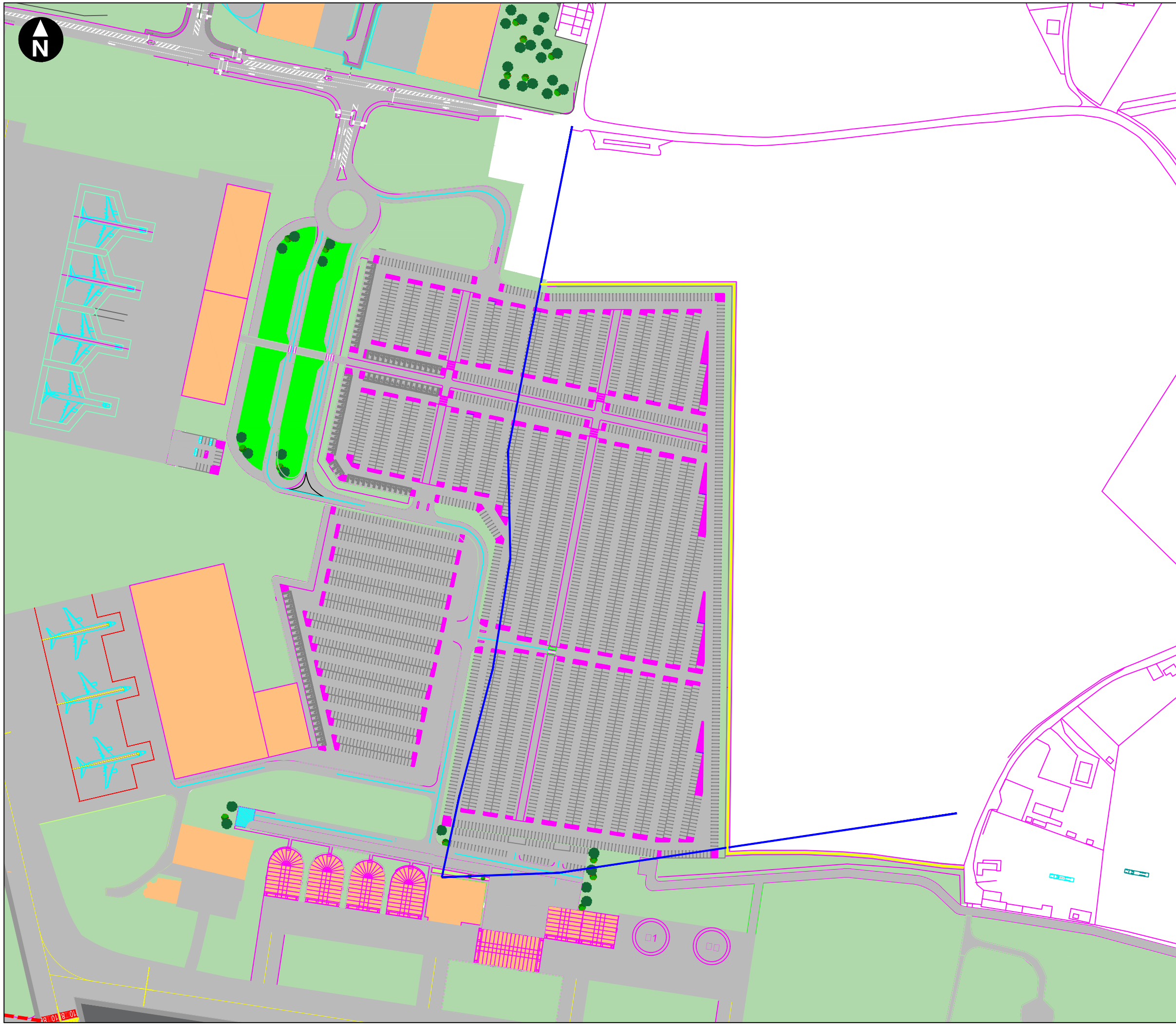
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**Figure 2.7**  
**Proposed link connecting TR9 with the existing footpath near the planned Thanet Parkway railway station**





Key

- Footpath TR8
- Proposed Diversion



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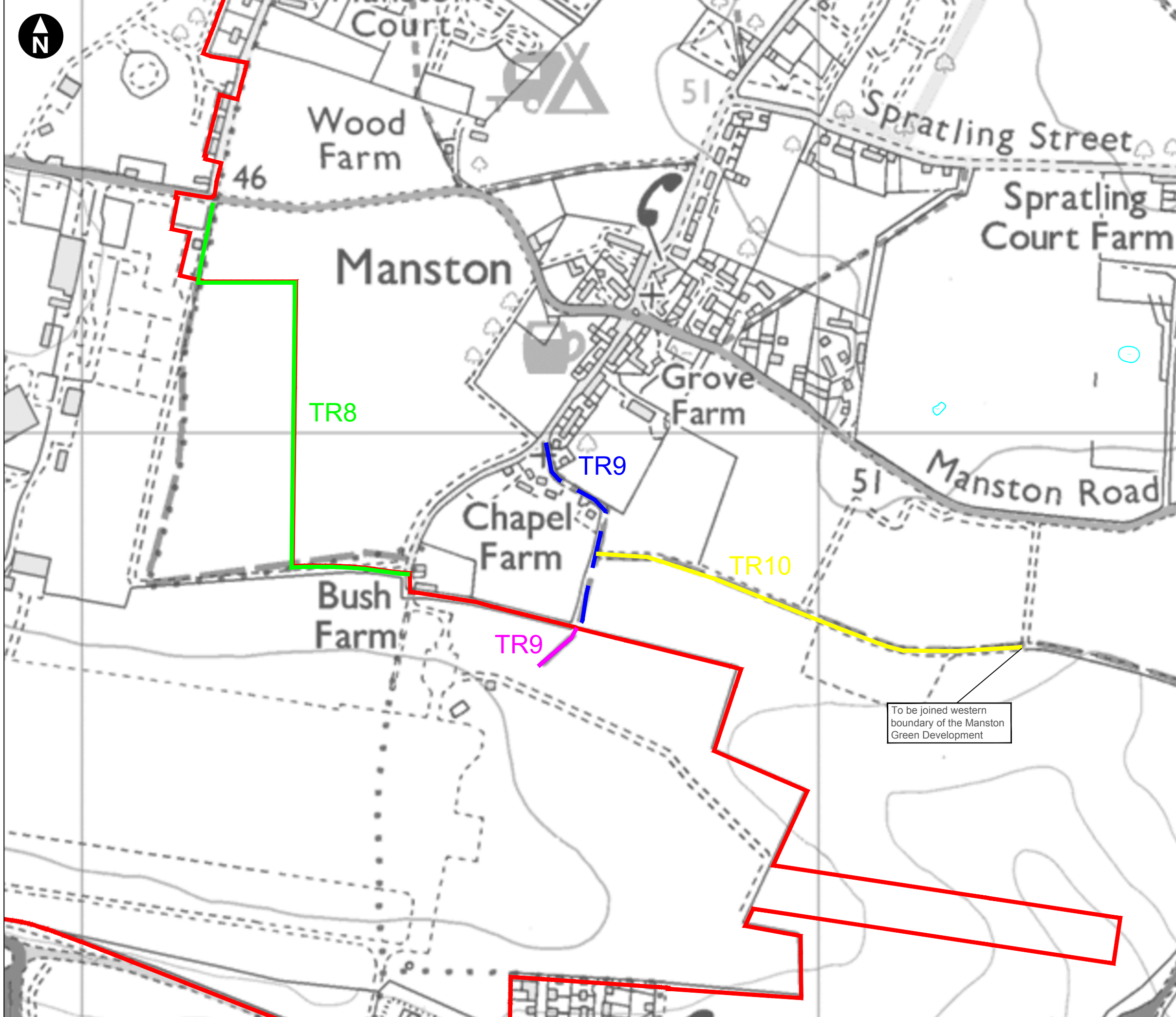
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**Figure 3.1**  
**Proposed diversion of TR8**

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- Key
- Order limits
  - TR8 - to be diverted, widened to 3m and upgraded with suitable paved surface
  - TR9 - no upgrade required as existing provision is suitable
  - TR9 - element of TR9 within red line boundary to be extinguished
  - TR10 - to be widened to 3m and upgraded with suitable paved surface

0 m 300 m  
 Scale 1:5000 @ A3

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**Figure 3.2**  
**Proposed PRoW Mitigation**