

Tr.5	Transportation and Traffic	
Tr.5.1	<p>Passenger Flight Movements</p> <p>The Applicant’s response to fourth written question TR.4.4 (iv) [REP9 – index number to be allocated] states:</p> <p><i>“No. The original TA and the revised TA assessed the traffic impact of 188 vehicles and 193 vehicles respectively. As demonstrated above, 2 departure flights between 11:00 and 12:00 and 1 arrival flight between 07:00 and 08:00 would result in less traffic than that already assessed”.</i></p> <p>The ExA is considering amending Requirement 19c to read:</p> <p><i>No passenger air transport departures will take place between the hours of 09.00 and 11.30. There shall only be one passenger air transport departure between the hours of 11.30 and 11.44 and one passenger air transport departure between the hours of 11.45 and 12.00. There shall also only be one scheduled passenger air transport arrival between the hours of 07.00 and 08.00.</i></p> <p>i. What is the Applicant’s response?</p> <p>What is the view of KCC?</p>	<p>KCC welcomes the proposed Requirement, as this would further assist in ensuring robustness of the traffic assumptions that have been made within the submitted TA. If the Applicant is not content with such a restriction, then a worst-case scenario should be assessed. A worst-case scenario would encompass the traffic movements from the maximum number of passenger air transport arrivals and departures that the airport is physically capable of handling (during the proposed hours of restriction).</p> <p>During Issue Specific Hearing 7, KCC highlighted the synergy between the type of carrier (and subsequently the size of plane) that operates from the airport and the potential number of passengers that it can generate. Page 83 of the original TA outlines the methodology of passenger trips that the Applicant expects the facility to handle based on the type of carrier anticipated to operate from Manston, which appear to be lower capacity carriers. KCC recommends a restriction on the maximum number of passengers per flight to coincide with these assumptions. A Boeing 747 for example can carry up to 660 passengers, therefore significant variation is theoretically possible with an unrestricted consent, should the nature of operations deviate from that forecast in the TA.</p> <p>As discussed during ISH7, it may be prudent to provide a level of flexibility to allow unavoidably delayed flights to land or take off. Therefore, the restriction could potentially be confined to scheduled flights rather than a blanket restriction, which could cause unreasonable operational impact to the airport, should occasional (unavoidable) delays ensue.</p>

Deadline 10 (5 July 2019) – KCC’s response to the ExA’s Fifth Written Questions

<p>Tr.5.3</p>	<p>Junction 12</p> <p>The Applicant’s response to Fourth Written Question TR.4.29 (ii) [REP9 – index number to be allocated] states:</p> <p><i>“The Applicant has had discussions with KCC about their concerns regarding the uncontrolled right turn lanes, and offered to look at this further. An extended intergreen will aid right turners to discharge with no opposing traffic at the end of the intergreen and will improve the visibility for drivers in the right turn bays by providing an overhang if possible. TR.4.29ii. presents junction modelling to demonstrate this. The junction model has an extra 2 seconds added to the intergreen. Adjustments can be made to right turn bays to improve visibility”.</i></p> <p>i. Does this overcome the concern of KCC with regard to this particular matter?</p> <p>The Applicant’s response to Fourth Written Question TR.4.29 (iii) [REP9 – index number to be allocated] states:</p> <p><i>“The RSA did not pick this up as an issue as it is recognised that this a commonplace feature at signal controlled junctions”.</i></p> <p>ii. Is this accepted by KCC?</p>	<p>i. It is likely that extended intergreen would not eradicate the issue of (gap seeking) traffic attempting to turn right within the relevant signal phase. An additional two seconds on the intergreen is unlikely to result in any significant improvement to the issues already raised. It is not clear what adjustments to the right turn bays the Applicant is suggesting and how this might impact on the overall operation of the junction as revised plans have not been submitted for consideration. KCC’s concern is therefore not overcome.</p> <p>ii. KCC suggests that it is likely that this issue has simply been overlooked by the Safety Audit Team. Unintentional oversights are not uncommon occurrences with Road Safety Audits. The fact that this may have been overlooked, does not then absolve KCC (as the Local Highway Authority) of its responsibility to assess the proposals and highlight any issues that it considers to be of importance. There is no compelling justification why a substandard design should be accepted simply because similar geometry exists at other signal-controlled junctions within the national/local road network and/or the Road Safety Audit has not raised a specific issue of concern.</p> <p>This junction will be subject to a significant amount of traffic flow once operating at full capacity (including an increased level of HGV activity), therefore the issues that have been raised should be addressed through positive revisions to the proposals, rather than tolerated or overlooked. In this case, it is evident that there is space available within the boundary of the DCO to provide a more favourable junction arrangement that could potentially address the issues raised (albeit this would result in more land take and a</p>

Deadline 10 (5 July 2019) – KCC’s response to the ExA’s Fifth Written Questions

	<p>The Applicant’s response to Fourth Written Question TR.4.29 (v) [REP9 – index number to be allocated] states:</p> <p><i>“Figure 7.5 does indicate that the visibility line is outside of the highway boundary. The extent of the visibility line in relation to the highway boundary and DCO boundary is illustrated in Appendix TR.4.29 which shows that it is a very small section, which is currently grass verge in front of the MOD building and does not present an obstruction. Junction intervisibility in accordance with Design Manual for Roads and Bridges (DMRB) standards (which relate to motorway and trunk roads) is regularly difficult to achieve in urban environments. TD50/04 identifies the 2.5m setback from the stop line and the junction intervisibility requirements thereafter, and makes reference to compromised visibility and mitigation measures that can occur. The junction design and operation including stage extensions and inter-green times etc. will be developed during detailed design”.</i></p> <p>iii. Is this acceptable to KCC?</p> <p>The Applicant states that this area of land is grass verge. However, aerial maps (google) show this containing numerous trees. Further, the Applicant’s response to Fourth Written Question TR.4.29 (vii) states:</p> <p><i>“A very small area immediately adjacent to the highway, that is currently grass verge, will have to be maintained in its current condition so as not to create</i></p>	<p>possible relocation of existing museum buildings), however at this juncture, such proposals are not currently before KCC or the ExA to consider.</p> <p>In view of the above, KCC is not content with deferring fundamental issues to the detailed design stage, as it is possible that following the granting of the DCO, the Applicant may be unwilling to engage with a request from the Local Highway Authority at the appropriate juncture, particularly if it instigates a need for further land take from the site or changes to existing buildings (such as the Museum). Also, any material change in the junction layout may require separate planning consent.</p> <p>iii. Whilst the area of intervisibility passes through third party land (that has not currently been built on), KCC as the Local Highway Authority has no jurisdiction over this land, as such junction intervisibility is not secured in perpetuity, which is not acceptable. The required intervisibility would also require the loss of some established highway trees within the verge, this is not indicated on the plan provided in Appendix TR 4.29. Whilst theoretically these trees are capable of being removed, this would have a negative impact on visual and environmental amenity in this location.</p> <p>Departures from standard such as intervisibility constraints should not represent the benchmark for highway design, where space exists within the site for a fully compliant junction scheme with the necessary visibility requirements to be delivered.</p> <p>vi. A 1.26 metre footway pinch point is substandard for the type and nature of the highway environment proposed. This road would fall</p>
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Deadline 10 (5 July 2019) – KCC’s response to the ExA’s Fifth Written Questions

	<p><i>an obstruction to visibility. It is extremely unlikely that any infrastructure will be introduced onto this plot of land so as to impede visibility. The ExA can be satisfied that inter-visibility will be maintained”.</i></p> <p>iv. Given that this area of land includes trees, justify this response and how this will be achieved.</p> <p>v. Why was this small plot of land not included within the DCO boundary?</p> <p>KCC’s response to Fourth Written Question TR.4.29 (xii) [REP9–index number to be allocated] states:</p> <p><i>“The proposed narrowing of the footway on the Manston Road (north) arm to 1.26m is not considered acceptable in the vicinity of this busy junction”.</i></p> <p>vi. What is the Applicant’s response?</p> <p>Why does KCC consider that this would impact on highway and pedestrian safety?</p>	<p>within the category of a Local Distributor Road in accordance with The Kent Design Guide¹, which is the established guidance document for development (including geometrical highway design) within Kent. Page 123 of the Kent Design Guide sets out design parameters for new road schemes. For a Local Distributor Road, a 3.0 metre footway width is recommended and a minimum desirable footway width of 1.8 metre width for footways required. This design parameter establishes safe, effective and comfortable passing opportunities for pedestrians (including road users with impaired mobility) considering the nature of the road type. Lack of footway width (and thus space for two pedestrians to pass) directly adjacent to the external wall of the museum building is likely to create an intimidating pedestrian environment and generate subsequent road safety implications for vulnerable pedestrians. It is also evident that the 1.26 metre footway pinch point removes the ability for safe and connected cycle links to be completed to the spitfire junction, which is important as in the absence of an alternative provision, it forms part of the future Manston-Haine Road Highway Link (which seeks to provide good quality road, foot and cycle linkage between Manston and Westwood to the north of the site).</p>
Tr.5.4	<p>Junction 15</p> <p>KCC’s response to Second Written Question TR.2.42 raised concern that the proposed scheme of mitigation (in the revised TA) results in significantly increased queue lengths on the College Road approach to the</p>	<p>i. It is noted from the LinSig modelling presented in the Technical Note (Appendix TR.4.31) that the proposed modifications to the signal timings would further decrease the Practical Reserve Capacity (PRC) of the junction in the 2039 AM peak hour. This is not acceptable to KCC, in view of the fact that the junction is already forecast to operate severely over capacity in the 2039 Base scenario. It is further noted that the Applicant is yet to directly address the</p>

¹ https://www.kent.gov.uk/data/assets/pdf_file/0018/12096/design-guide-movement.pdf

Deadline 10 (5 July 2019) – KCC’s response to the ExA’s Fifth Written Questions

	<p>junction. The Applicant’s response to Third Written Question TR.3.29 sets out that:</p> <p><i>“The issue of queue lengths on College Road can be addressed by minor modifications to the signal timings if reductions in queuing on this arm is a priority”.</i></p> <p>In response to Fourth Written Question TR.4.31 (i) [REP9–index number to be allocated] the Applicant has provided a Technical Note at (Appendix TR4.31) that seeks to demonstrate this view.</p> <p>i. Does this overcome KCC’s concern in this regard?</p> <p>Is KCC content with the mitigation scheme proposed in the original TA?</p>	<p>queries raised by KCC in its Local Impact Report regarding the proposed mitigation scheme for this junction.</p>
Tr.5.5	<p>Alland Grange Junction – Highway Safety</p> <p>The Applicant’s response to Fourth Written Question TR.4.40 (iii) [REP9 – index number to be allocated] states:</p> <p><i>“...No contribution will be made towards the Alland Grange junction as the substandard visibility is a pre-existing issue and therefore requires KCC, under their duties as the highway authority, to maintain road safety and is therefore not secured in the Section 106 agreement. In any event, it is highly unlikely that land owner would secure planning permission to carry out any development that would encroach upon the visibility splays”.</i></p>	<p>KCC does not agree with this statement. The Applicant clearly identified a requirement for a highway safety mitigation scheme, in view of the traffic impact created by the development (i.e. increased traffic flow on Spitfire Way) and not to directly address perceived existing safety issues. Therefore, the requirement for mitigation at this junction is instigated by the Proposed Development and thus should be secured through the DCO/S106 agreement.</p> <p>KCC (as the Local Highway Authority) would have no jurisdiction over the areas of third-party land required to achieve the vehicle sightlines (unless the land was secured as part of the DCO or through direct negotiation with the landowner). There would be nothing preventing the landowner from planting a boundary treatment in the future, as such junction visibility is not secured in perpetuity and KCC</p>

Deadline 10 (5 July 2019) – KCC’s response to the ExA’s Fifth Written Questions

	<p>Do KCC agree with this statement and that no mitigation is required at the junction?</p>	<p>do not accept responsibility for delivering this necessary mitigation scheme.</p>
Tr.5.6	<p>Permitted Development Rights</p> <p>KCC’s response to Fourth Written Question TR.4.41 [REP9 – index number to be allocated] states:</p> <p><i>“KCC accepts that only those Highways mitigation measures that require planning permission should be included as associated development and granted planning permission via the DCO. The Highway Authority considers that the following mitigation measures do not benefit from permitted development rights and would need be included in Schedule 1 to the DCO:-</i></p> <p><i>Junction Improvements at Alland Grange Lane/Spitfire Way</i></p> <p><i>Proposed signal-controlled junction improvements at Manston Road/ Manston Court Road.”</i></p> <p>i. Why does KCC consider that permitted development rights do not apply at these junctions?</p> <p>What is the Applicant’s response?</p>	<p>KCC’s view is that the mitigation works at Alland Grange Lane/Spitfire Way and Manston Road/ Manston Court Road would not benefit from permitted development for the following reason-</p> <p>The works proposed at the named junctions are not within the boundaries of the highway. Whilst KCC accepts that works on adjoining land that are incidental to maintaining and improving the highway are permitted, the works themselves cannot form part of the highway. Therefore, permitted development on adjoining land cannot involve development for the primary provision of the highway. For example, where adjoining land is required to broaden the highway itself this does not fall within permitted development. This is the case for both the proposed highway safety improvements at the Alland Grange Lane/Spitfire Way junction and the proposed signalisation improvements at Manston Road/ Manston Court Road junction, as they require third party land in order to be implemented as shown within the submitted scheme drawings.</p>
Tr.5.9	<p>Revised Section 106 Agreement</p> <p>The Applicant has provided a revised draft Section 106 Agreement [REP9–index number to be allocated].</p>	<p>ii. Whilst recognition from the Applicant that a contribution towards the Manston-Haine Link Road is required constitutes a positive step forward, KCC has not yet been provided with the evidential basis for arriving at the sum of £500,000. KCC suggested that this should be</p>

Deadline 10 (5 July 2019) – KCC’s response to the ExA’s Fifth Written Questions

	<p>i. Why is a financial contribution for Junction 21 included in Schedule 9, when the Applicant’s response to fourth written question TR.4.35 (v) sets out that one is not required?</p> <p>ii. Schedule 7 includes a financial contribution of £500,000 towards the Manston Haine Link Road, is this figure accepted by KCC?</p> <p>iii. Does the map in Annex 5 show the entire land safeguarded for the Manston-Haine Link Road?</p> <p>iv. Why do the maps included in the revised Section 106 Agreement not match those provided in Appendix TR.4.48 to the Applicant’s response to Fourth Written Questions?</p> <p>The Applicant’s response to Fourth Written Question TR.4.53 (vi) [REP9–index number to be allocated] states:</p> <p><i>“An allowance of £2500 has been included for this signage and has been included in the draft S106 Agreement. This is based on a requirement for ten signs at £250 per sign”.</i></p> <p>Where in the revised draft S106 Agreement [REP9–index number to be allocated] is this secured?</p>	<p>calculated using an updated methodology that was produced to inform the emerging Thanet Local Plan</p> <p>It is likely that a proportionate contribution to the Thanet Transport Strategy (as suggested by KCC on numerous occasions throughout the Examination) would generate a higher financial requirement than £500,000 proposed by the applicant. As such if the ExA decides to recommend approval of the DCO, then KCC suggests that the £500,000 contribution would be more preferable to simply removing the requirement altogether. KCC does not agree with the proposed trigger for this payment. In the absence of justification, this should be payable prior to the occupation of the development and not linked to the granting of planning permission as suggested in the draft S106 agreement.</p> <p>iii. The map in Annex 5 does not show the entire land safeguarded for the Manston-Haine Link Road. Annex 5 only shows the area of land to the North Western section of the Northern Grass and not the entire route of Manston Road to Spitfire Way, as shown on previous plans that were submitted (The Summary of Applicant’s Case put Orally - Traffic and Transport hearing and associated appendices [REP8-017] at Appendix ISH7 – 38). The KCC response to Fourth Written Questions TR.4.12 outlines a potentially more acceptable safeguarding area. KCC also requires land to be safeguarded at Spitfire Way for the required Road Junction improvements. This area has yet to be defined or produced on any of the Applicants safeguarding plans. As previously stated, the requirement for land transfer can be changed in favour of a requirement to dedicate the land as public highway.</p>
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Deadline 10 (5 July 2019) – KCC’s response to the ExA’s Fifth Written Questions

		<p>The £2,500 for signage is not currently secured and has not been discussed with KCC, however this sum should be included within the Section 106 agreement and £250 per sign would cover reasonable costs likely to be incurred in this matter (including design and consultation where necessary).</p>
<p>Tr.5.15</p>	<p>Technical Note: Appendix TR.4.1 - A256 - Junctions Assessments</p> <p>The Applicant at Deadline 10 provided a Technical Note [REP10–index number to be allocated] that sets out the results of junction modelling to assess the potential impact along the A256 corridor (based on the original TA).</p> <p>i. Provide a map showing the exact locations of the junctions assessed.</p> <p>The Technical Note states: <i>“The following three junctions have been modelled based on junction models and baseline traffic data available in the Discovery Park Transport Assessment (Planning ref: 14/00058)”</i>.</p> <p>ii. Is it appropriate to use this data source that is over 5 years old?</p> <p>iii. If not, how will this matter be addressed by the end of the examination?</p>	<p>iv. It is not usual transport planning practice to use data older than three years for the basis of detailed modelling proposals, however it is accepted that it can sometimes be necessary to utilise historic data where there is an absence of more recent data sources. This should however be used with caution, particularly if there has been a substantial amount of new development or traffic growth within a given locality since the original data was collected, as this could mean that the data is no longer representative of baseline traffic conditions. In the case of the A256 corridor, this is located directly next to Discovery Park, which is a key employment destination within the Dover District.</p> <p>Annual Traffic forecast data published by the Department for Transport² suggests that the Annual Average Daily Flow on the A256 Corridor has increased by 6302 vehicles between 2014 and 2018, which represents a significant increase in traffic of approximately 33% (over the four years following the production of the Discovery Park TA) and suggests significant growth in excess of National Trends³. Therefore, in view of this available data, it would be prudent to undertake additional traffic surveys to sense check the Discovery</p>

² <https://roadtraffic.dft.gov.uk/manualcountpoints/17864>

³ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/808555/road-traffic-estimates-in-great-britain-2018.pdf

	<p>iv. Is this accepted by KCC? <u>A256/Ramsgate Road/Copart Access Junction</u></p> <p>The Technical Note at Paragraphs 2.2.4 and 2.2.5 states:</p> <p><i>“In the AM Peak there is an increase in queuing of 3 vehicles on the A256 North arm, with a marginal change in RFC on other arms. It is considered that this is not a significant impact”.</i></p> <p><i>“In the PM Peak there is an increase in queuing of 28 on the Ramsgate Road arm and 1 on the A256 North arm, with a marginal change in RFC on some of the arms”.</i></p> <p>The Technical Note at Paragraph 2.2.6 also suggests that this is a similar level of impact as that presented in the Discovery Park Transport Assessment, which was accepted by KCC as not severe and not requiring mitigation.</p> <p>v. Does KCC accept that such impacts are not severe?</p> <p>Paragraph 2.2.7 of the Technical Note goes on to state:</p> <p><i>“Consideration has been given to junction improvement within the highway boundary, and a minor increase to the flare on the Ramsgate Road arm from 6.7 to just 15m would result in betterment on nil detriment”.</i></p>	<p>Park Transport Assessment forecasts and if necessary, inform revised junction modelling should significant disparity be identified.</p> <p>v. KCC would not concede that the impacts are “not severe”. However, anecdotally KCC is unaware of significant delay at the junction (at this time), and as such this would generally support the conclusions in this location.</p> <p>vii. if considered in isolation KCC would agree with this assessment presented in the Technical Note, however in this case it is important to highlight that peak hour queuing at the A257/A256 Ash Road Roundabout leads to exit and entry blocking back within this junction. Therefore, the outputs presented within this note are likely to be more severe in real terms. This adds additional weight to the requirement for appropriate mitigation at A257/A256 Roundabout.</p> <p>x. Please refer to previous answer iv. In addition, KCC would like to reiterate answers that it made within Fourth Written Questions (TR.4.1). This junction is already subject to severe peak hour queuing and delay, which can be confirmed by examination of publicly accessible typical traffic conditions (Google Maps). It is possible that this is a result of the aforementioned disproportionate increases in traffic flow within this part of the road network within the last four years. As such the conclusions arrived at within the Discovery Park TA, do not represent an up to date forecast with which to draw fully informed conclusions in relation to the DCO.</p> <p>xiii. KCC accepts that it is likely that some form of longer-term mitigation scheme will be required at this junction in the future, however, to date no such scheme has currently been</p>
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	<p>vi. Will the Applicant therefore be providing a junction mitigation scheme supported by a Stage 1 Road Safety Audit and Designer’s Response before the close of the examination, with sufficient time for other parties to consider?</p> <p><u>A256/Monk’s Way</u></p> <p>Paragraph 2.3.4 of the Technical Note states:</p> <p><i>“In the AM Peak there is an increase in queuing of 1 vehicle on the A256 North arm and 9 vehicles on A256 South arm, with a marginal change in RFC on A256 South arms. In the PM Peak there is an increase in queuing of 1 on the A256 North arm, with a marginal change in RFC on some of the arms. It is considered that this is not a significant impact”.</i></p> <p>vii. Is this accepted by KCC?</p> <p><u>A256/Ash Road/A257</u></p> <p>The Technical Note at Paragraph 2.4.5 identifies that:</p> <p><i>“The development impact is predominantly on the A256 South arm in the AM peak (queue increase of 156 vehicles and RFC change of 0.08) and the A256 North in the PM peak (queue increase of 93 vehicles and RFC change of 0.09)”.</i></p> <p>viii. Does the Applicant accept that this is a severe impact?</p> <p>Paragraph 2.4.9 of the Technical Note states:</p>	<p>developed/identified in any detail. It is possible that a review of the Dover Local Plan could identify a need for longer term mitigation on this corridor, however at this juncture there is no longer-term scheme or development strategy with which to inform a S106 tariff-based mitigation approach.</p> <p>Given the late stage of the Examination process, it is unlikely that this issue can be resolved within the remaining timeframes. If this issue had been addressed by the Applicant sooner, it may have been possible for it to develop a mitigation scheme which seeks to address the impact from the proposed development (in agreement with KCC). This could have then been used as a basis for a financial contribution to KCC towards longer term strategic improvements at this junction in the future.</p> <p>xiv. KCC would reiterate answers iv and x.</p> <p>In addition, a mitigation scheme at A256/A257 roundabout was requested by KCC as part of this Application. KCC suggests that it is inappropriate to directly compare highway impacts that were assessed/accepted as part of the Discovery Park Planning Application, as this was considered within the extant traffic impact framework of the existing Local Development Order (LDO) (which is the planning mechanism for implementing the Enterprise Zone at Discovery Park). Previous uses of the Discovery Park site (as Pfizer’s Research and Development facility) and previously extant potential for associated traffic impact, were also a material planning consideration at the time that the LDO was granted.</p>
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Deadline 10 (5 July 2019) – KCC’s response to the ExA’s Fifth Written Questions

	<p><i>“The impact of the Manston Airport traffic is similar or less than that of Discovery Park which did not result in the need for a mitigation scheme”.</i></p> <p>ix. Is it reasonable to compare the impacts of the proposed development against one determined 5 years ago?</p> <p>x. What is the view of KCC on this matter?</p> <p>Paragraph 2.4.3 of the Technical Note states:</p> <p><i>“KCC has acknowledged during discussion that the junction has capacity issues and that the highway authority needs to identify an improvement scheme to address this, with the expectation that developers would contribute to this”.</i></p> <p>xi. On this basis, will the Applicant be making a financial contribution to mitigation at this junction?</p> <p>xii. If so, how will this be calculated and provided for?</p> <p>xiii. What is the view of KCC on this matter?</p> <p>The Technical Note concludes at Paragraph 3.1.1:</p> <p><i>“The results of the modelling exercise show that the development traffic through the junctions has less of an impact than Discovery Park Development that was granted permission that did not offer any mitigation improvements at the junctions despite</i></p>	
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Deadline 10 (5 July 2019) – KCC’s response to the ExA’s Fifth Written Questions

	<p><i>putting a larger amount of traffic onto the junctions in the peak hours”.</i></p> <p>xiv. Is this accepted by KCC?</p> <p><u>Air Quality and Noise</u></p> <p>xv. Have these additional impacts been modelled in the air quality and noise assessments?</p> <p>If not, how will this be addressed by the end of the examination, with sufficient time for other parties to consider?</p>	
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