

Our Ref: AS/JCG21463
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Date: 28th October 2016

Transport Strategy Team
Planning and Environmental Division
Kent County Council
Invicta House
County Hall
Maidstone
Kent
ME14 1XX

By Email Only to LTPConsultation@kent.gov.uk

Dear Sirs,

KENT COUNTY COUNCIL DRAFT LOCAL TRANSPORT PLAN 2016-2031

I write in connection with the above document to provide you with representations on behalf of our Client RiverOak Investment Corporation (RiverOak). I would be grateful if you could consider the points raised in this letter as part of your wider consultation on the Local Transport Plan. If you think it would be helpful to meet with RiverOak to discuss this matter further, please do not hesitate to contact me.

By way of background, RPS has been appointed by RiverOak to advise as part of the Development Consent Order (DCO) process established by the Planning Act 2008 in respect of the reinstatement and development of Manston Airport. It is RiverOak's intention to apply for a DCO encompassing the compulsory purchase of the airport and the permissions required for the reinstatement of Manston as a specialised aviation agglomeration centre offering a number of facilities and services including a major international centre for air freight; a reliever for the major airports of London; an extensive aircraft recycling and engineering facility; a base for at least one passenger carrier; a flight training school and a fixed base operation for executive travel.

RiverOak has notified the Secretary of State at the Department of Communities and Local Government of its intention to submit an application for a DCO and they have been having meetings with the Planning Inspectorate about this since December 2015. Minutes of the meetings are available via the Planning Inspectorate's National Infrastructure Planning website.

Incidentally, RiverOak and members of their consultant team met with Kent County Council (KCC) in April 2016 to provide an overview of their proposals for Manston Airport. The meeting was attended by Katie Stewart, Tom Marchant, Joe Radcliffe, David Smith and Sally Benge of KCC.

The following representations are structured around the following three themes that are addressed within the draft Local Transport Plan (LTP):

- Maximising Use of Existing Regional Airport Capacity
- Thanet Parkway Rail station

- Thanet

Maximising Use of Existing Regional Airport Capacity

The draft LTP states on page 23 under the heading 'Aviation' that KCC's discussion paper '*Facing the Aviation Challenge*' (August 2014) sets out clearly their position on aviation. The draft LTP states that this document centres on '*maximising use of existing regional airport capacity, along with some expansion of existing airports and improved rail connections.*' It continues by saying that no viable business proposition for aviation at Manston Airport has come forward but Lydd Airport plans to extend its runway and expand its terminal.

The first point to make is that the August 2014 KCC document in Section 3.4 (page 13) in fact states that '*following its closure as a commercial airport in May 2014, a financially viable and sustainable future must be found for Manston airport. This should focus on the use of the site for aviation and related services as well as other businesses that can bring jobs and economic growth to East Kent.*' Consequently, the draft LTP as currently worded contradicts the County Council's own position on aviation and should be corrected.

Secondly, it is factually incorrect to state that no viable business proposition for aviation exists at Manston Airport. RiverOak are actively in the process of preparing their DCO and have consulted with the public on a non-statutory basis in July 2016 about their development intentions. A statutory consultation will take place in early 2017 as part of the DCO preparation. Until the DCO process has been concluded, it would be wrong to assume that no aviation-related development could come forward at the airport.

Finally, it would be entirely inappropriate for the LTP to report any position in relation to Manston Airport that does not reflect the current position as adopted by Thanet District Council (TDC) in its Local Plan. At this stage, and until any alternative position has been tested through the Local Plan process, or should some other material planning consideration arise, the LTP must respect TDC's adopted policy which is to support the development, expansion and diversification of Manston Airport (saved Policy EC2 of the TDC adopted Local Plan 2006) and to oppose and development or use of land in the defined area (of the airport) which does not specifically require an airside location. The LTP should certainly not, as it does on page 20, attach any weight or significance to the contribution that could be made by the measures outlined in the LTP to support local housing growth and particularly, the proposals by Stone Hill Park at Manston Airport. These proposals are the subject of a planning application which are yet to be determined by TDC. KCC and the LTP cannot pre-suppose that the Stone Hill Park proposals will be allowed and that as a consequence, transport measures need to be put into place to support that development.

If it is genuinely KCC's position to maximise use of existing regional airport capacity, the LTP must consider the significant opportunity at Manston Airport in terms of maximising regional connectivity with the rest of the UK and further afield and at very least, RiverOak's proposals that are being progressed via the DCO process. It is RiverOak's firm belief that Manston Airport should be considered by KCC as a strategic priority in its transport infrastructure planning for the region especially when considering that Dover District Council and perhaps other local Kent authorities support safeguarding of Manston as an operational airport (Council's motion passed at a meeting of the Full Council in July 2014).

Thanet Parkway Rail Station

RiverOak support the principle of a new Thanet Parkway Rail Station in the event that proposals to reopen the airport are permitted. The crow-fly distance between the current airport passenger terminal and the proposed railway station is some 1.8km. The road distance is 5km. A connection between these two public transport facilities should be encouraged if the airport is reopened as this would enable passengers to travel more sustainably to the airport and provide a usable/efficient transfer to a rail service (1 hour to London).

No comment has been found relating to the possibility of freight handling at the proposed parkway railway station. RiverOak's proposals are to create an international hub for air freight so there may be opportunities for the airport to have a more sustainable distribution network should a freight rail head be located at the parkway station.

The proposals show that the station would be accessed via a new arm on the current A229/A256 roundabout. Parkway stations typically operate as 'park & ride' facilities and so vehicular traffic will be expected particularly to/from areas to the north of the station where passengers are likely to approach the station on Manston Road. This is likely to increase traffic flow in the vicinity of the airport which may impact on any proposals to reopen the airport.

Thanet

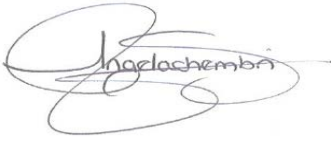
There are a number of transport schemes identified for the Thanet District (page 50) which we believe should be considered further in light of the proposals to reopen Manston Airport as follows:

- Ramsgate Port Investment – this is strongly supported by RiverOak because of the opportunities that are presented for freight distribution in conjunction with a reopened airport;
- Thanet Park Railway Station – see above;
- Inner Circuit Road connecting Westwood Cross/Thanet Loop Road improvement (Shottendane Road) – this proposes the widening of Manston Road and Spitfire Way which in capacity and safety terms is supported. Any widening should be sufficient to accommodate traffic rerouting as a result of the loop road and should be designed to consider the possibility of the airport reopening. It is believed that the loop road scheme would provide an alternative route for airport traffic to/from the west and provide resilience to the network should an incident occur.

Conclusion

RiverOak are keen to continue engagement with KCC in respect of their proposals to reopen Manston Airport and how these proposals and the associated traffic/transport implications can be properly planned for including as part of the LTP and alongside other initiatives that are proposed for the benefit of the county. The draft LTP recognises that the future of the airport is a transport priority for the county. However, RiverOak believe that the document can better embrace the opportunities that Manston Airport can promote and they are keen to discuss these further with KCC.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Angela Schembri', is written over a large, loopy scribble.

ANGELA SCHEMBRI
Planning Director