

Application by Riveroak For An Order Granting Development Consent For An Airport At Manston Airfield

Application Ref: TR020002

Written Representations of the Historic Buildings and Monuments Commission for England (Historic England)

Registration ID No. 20014009

Our Ref: PA00513760

Dated: 15 February 2019

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1. SUMMARY

1.1. The proposed development lies within a very rich archaeological landscape and there is therefore great potential for important remains to be discovered there. The development site also contains the remains of an historic airfield and important historic aviation buildings. The open grassland character of much of the airfield evokes its wartime use. There are no designated heritage assets within the proposed development site at the present time; however we think that further heritage assessment work might reveal heritage assets of great, perhaps national, importance.

1.2. There is inadequate understanding of the archaeological significance of the North Grass Area and some areas of the proposed airside development, the heritage significance of historic buildings and the historic landscape character of the airfield to make properly informed decisions about the proposed development.

1.3. In the Environmental Statement (ES) an adequate “worst-case” impact assessment of buried archaeological remains has been undertaken; however, historic buildings and the historic landscape character of the airfield have not been adequately assessed in the same way.

1.4. In view of the inadequate heritage assessment and impact assessment Historic England thinks that the applicant should provide sufficient flexibility in the scheme quantum and design to preserve nationally important heritage

assets, should they be identified, in compliance with the requirements of the Airports National Policy Statement (ANPS).

1.5. We suggest that consideration is given to amending some of the draft Development Consent Order (DCO) Requirements, and creating some additional Requirements, in order to secure appropriate treatment of heritage assets in the proposed scheme.

2. THE ROLE OF HISTORIC ENGLAND

2.1. The Historic Buildings and Monuments Commission for England (Historic England) is an independent grant-aided body governed by Commissioners. It was established with effect from 1 April 1984 under Section 32 of the National Heritage Act 1983. The general duty of Historic England under Section 33 is as follows: "...so far as is practicable:

- a) to secure the preservation of ancient monuments and historic buildings situated in England;
- b) to promote the preservation and enhancement of the character and appearance of conservation areas situated in England; and
- c) to promote the public's enjoyment of, and advance their knowledge of, ancient monuments and historic buildings situated in England and their preservation".

2.2. Historic England's sponsoring ministry is the Department for Digital, Culture, Media & Sport, although its remit in conservation matters intersects with the policy responsibilities of a number of other Government departments,

particularly the Ministry of Housing Communities & Local Government, with its responsibilities for land use planning matters.

2.3. Historic England is a statutory consultee on certain categories of applications for planning permission and listed building consent. Similarly Historic England advises the Secretary of State on those applications, subsequent appeals and on other matters generally affecting the historic environment. It is the lead body for the heritage sector and is the Government's principal adviser on the historic environment.

2.4. Historic England encourages pre-application discussions and early engagement on projects to ensure informed consideration of heritage assets and to ensure that the possible impacts of proposals on the historic environment are taken into account.

3. HERITAGE ASSETS

3.1. The proposed development lies within a very rich archaeological landscape, in which numerous designated and non-designated archaeological sites of national importance have been located. Prehistoric remains include ritual monuments, for example Bronze Age barrows and Roman and Saxon cemeteries. There are also Iron Age, Roman and medieval settlements and their associated landscapes present. Typically, these archaeological sites exist as buried rather than upstanding remains. The airfield has its origins in the First World War, although it expanded in the Second World War, and once occupied a greater area than the present airport. There are significant

historic buildings relating to aviation and anti-invasion defence on the proposed development site and near to it. The open grassland character of much of the airfield evokes its wartime use.

3.2. There are no designated heritage assets within the proposed development site at the present time; however we think that further heritage assessment work might reveal heritage assets that have a level of importance equivalent to designated heritage assets such as listed buildings or scheduled monuments, which is one of the main reasons that Historic England has made representations about this application.

4. WORK TO ASSESS HERITAGE SIGNIFICANCE

4.1. Archaeological remains

4.1.1. For a project of this size and complexity we would expect provision to be made for a programme of archaeological evaluation tailored to assess the effects of the proposal on archaeological remains. This would usually entail geophysical survey and trial trenching. Subsequent work might also be necessary to mitigate the impacts of the development.

4.1.2. Some heritage assessment of the proposed development site has been undertaken by others, such as the advocates of housing development on the airfield (Stonehill Park - Thanet Planning Application Ref OL/TH/16/0550); however this assessment does not provide complete coverage of the application site and neither is it in sufficient depth in some respects (see below). The lack of information about the character,

extent and importance of archaeological remains, historic buildings and the historic landscape character of the airfield is a key unresolved issue.

4.1.3. River Oak have notified us that have not been able to gain access to the site to undertake their own surveys so they have had to depend on those undertaken by others, such those by Stonehill Park; however these only covered the southern and central part of the site (with some exceptions) and not the North Grass Area. More recent geophysical survey of the North Grass Area for the Stonehill proposal has not yet been released into the public domain.

4.1.4. Therefore, although the applicant might be able to explain why surveys have not been undertaken the fact remains that there is inadequate understanding of the archaeological significance of the North Grass Area and some areas of the proposed airside development to make informed decisions about the proposed development.

4.2. Historic buildings

4.2.1. For a project of this size and complexity we would expect a programme of historic building survey to record and analyse the heritage significance of historic buildings in order to inform decisions about whether they warrant preservation and re-use or whether their demolition would be justified.

4.2.2. An overview of historic buildings was commissioned by Kent County Council in 2016 (*Survey Of Buildings And Structures Associated With*

Manston Airport And The Surrounding Areas, Richard Taylor & Victor Smith, 2016) but it was not a detailed account of the buildings. The applicant has apparently not had access to the site in order to undertake more detailed surveys.

4.2.3. There is some acknowledgement in the ES that further survey would be appropriate in order to determine the heritage significance of historic buildings. For example, in paragraph 9.9.6 it says that the RAF Manston WWII Battle HQ would merit a special recording effort, although to this we would add the T2 Hangar, WWII Dispersal Bay and the RAF Manston Control Tower. In paragraph 9.9.3 the ES says that further survey may identify that some assets would be suitable for designation as Listed Buildings.

4.2.4. Therefore, again, while the applicant might be able to explain why surveys have not been undertaken the fact remains that the understanding of historic buildings is inadequate to make properly informed decisions about the proposed development.

4.3. Historic character of the airfield

4.3.1. We think that the airfield itself has some heritage significance that arises from its historic landscape character, which enables understanding and appreciation of its wartime use. In particular, the open grassland character of much of the airfield evokes its wartime use. Furthermore, we think that the airfield contributes to the heritage significance of the

wartime buildings, the museums and the memorial garden. Together these features create a sense of place.

4.3.2. The historic character of the airfield has been given some attention in the ES (9.4.43 and 9.4.51) but it is insufficiently detailed to adequately inform decisions about whether to retain open space and views across the grass airfield or views between historic buildings. We understand that the applicant does not propose to undertake any further assessment of the historic landscape character of the airfield.

5. THE IMPACTS OF THE PROPOSED DEVELOPMENT

5.1. Policy considerations

5.1.1. We acknowledge that the ANPS allows that, where details are still to be finalised, such as in respect of the phasing of the development and operational changes at the airport, the applicant may set out instead design parameters and use these to initially assess the likely impacts of the proposed development (4.16-4.18). We understand that where it has not been possible to undertake adequate surveys to assess heritage significance, it may be possible to set out design parameters and adopt a “Rochdale Envelope” approach to assessing impacts. However while a “worst-case scenario” has been identified with respect to buried archaeological remains (see s.9.8.5 – 9.8.10 of the ES), we think this is not the case with respect to the historic buildings and historic landscape character of the airfield.

5.1.2. Paragraph 5.191 of the ANPS says that if non-designated heritage assets of archaeological interest are demonstrably of equivalent significance to scheduled monuments they should be considered subject to the more demanding policies that relate to designated heritage assets. In particular, if archaeological remains are found to be of national importance: great weight should be attached to their conservation; any harm would require clear and convincing justification; less than substantial harm must be weighed against public benefits; and substantial harm should be exceptional and only justified where outweighed by substantial public benefits. In this case it might be appropriate to preserve in situ the asset, in which case this should be provided for in the Master Plan.

5.1.3. Given the potential for nationally important archaeological remains we think that the applicant should provide sufficient flexibility in the scheme quantum and design for any such assets that may be discovered during the course of future surveys to be preserved as part of the scheme; however we don't think that the applicant has adequately done this in the ES.

5.1.4. The applicant has proposed to undertake "best endeavours" to avoid harm to heritage significance; however, they have formulated a methodology for how this might be achieved as a hierarchy of possible action (from avoidance as the first option to archaeological excavation as the last), which is inappropriate in our view as the lower tiers of the

hierarchy are mitigation techniques that would not avoid harm. Therefore the hierarchy would be a dilution of the commitment to undertake best endeavours to avoid harm.

5.1.5. Paragraph 5.192 of the ANPS says that the Secretary of State will also consider the impacts on other non-designated heritage assets on the basis of clear evidence that the assets have a significance that merits consideration in that decision, even though those assets are of lesser value than designated heritage assets. In this case such heritage assets would include archaeological remains that are shown to be of less than national significance, historic buildings that are not listed and historic landscape character. For the Secretary of State to make an informed decision in such circumstances sufficient survey and assessment is required to enable a judgement to be made about whether there is clear evidence of the significance of heritage assets. In our view there could be circumstances in which it would be appropriate to preserve historic buildings and historic landscape character when they are shown to have considerable heritage significance.

5.1.6. In paragraph 5.195 of the ANPS the applicant is encouraged to prepare proposals that can make a positive contribution to the historic environment, and to consider how their scheme takes account of the significance of the heritage assets it affects. It says that this can include enhancing heritage assets and their settings, reducing risk to heritage assets, and considering visual or noise impacts and opportunities to

enhance access to, or appreciation of, the heritage assets affected by the scheme.

5.2. North Grass Area

5.2.1. The Project Description Chapter of the ES sets out the maximum parameters for the Northern Grass in sections 3.3.93 – 3.3.102. When compared to the “worst-case” assessment of archaeological potential (s.9.8.5 – 9.8.10) a worst-case assessment of impact is possible in general terms. The ES indicates that the North Grass Area would be densely developed with large structures, which we presume would require deep and extensive foundations and services. We think that any buried archaeological remains in these areas would be harmed by ground works, and that the greater the range and depth of these foundations and services, the more likely it will be that archaeological remains would be severely damaged or destroyed.

5.2.2. The ES says “Key to archaeological mitigation is the inherent flexibility offered in the zonal approach adopted for Masterplan preparation, together with a structured post-consent delivery process for generating informed development and archaeological mitigation proposals” (s.9.8.13); however no information is given about the zonal approach or how it would allow impacts to be avoided so it is hard to see how the requirements of the ANPS (s.5.191) could be met.

5.3. Historic buildings

5.3.1. The proposed development seems to require the alteration, movement or removal of some or all of the historic buildings and structures on the site, which we think would be harmful to their significance. The ES recognises “a high magnitude of change on some buildings” (s.9.9.6) but it is not clear which buildings would be removed and which could be retained.

5.3.2. We note that the ES says that further investigation and assessment of these structures is required to ascertain their current condition, desirability and feasibility for incorporation as a sustainable asset in the final design, and that the adoption of an agreed scheme of building recording and a degree of flexibility within master planning proposals would potentially allow significant adverse effects to be avoided. However, it goes on to say that the amount of design flexibility needed to ensure that impacts could be avoided is not practicable in all cases, and in the worst-case scenario mitigation (and presumably avoidance of harm too) has been disregarded (s.9.9.6). In our view this is highly problematic because we think that some of the historic buildings could be of national importance and so enough flexibility should be retained to provide for their preservation in order to comply with the requirements of the ANPS (s.5.192 and 5.195).

5.3.3. On the basis of the initial historic buildings survey that has already been done we think that some buildings are more likely than others to warrant preservation; in particular the T2 Hangar, WWII Dispersal Bay,

RAF Manston Control Tower and the RAF Manston WWII Battle HQ are likely to merit consideration in the Secretary of State's decision (ANPS 5.192 and 5.195). We think further survey and assessment is needed to properly understand their significance, and the quantum and design of the development should be sufficiently flexible to allow for their preservation and sustainable use within the development scheme, should further assessment confirm that this is warranted.

5.3.4. Historic buildings that are retained may have their heritage significance harmed by change to their settings caused by the construction of large new buildings so provision should also be made to protect the settings of retained historic buildings where this contributes to their heritage significance, for example, views between contemporary buildings and airfield features, such as runways.

5.4. Historic landscape character

5.4.1. The proposed new buildings would greatly alter the open grassland character of the site, which would severely damage or destroy the historic landscape character of the airfield. However, we think that the ES does not adequately describe the historic character of the airfield or the effect of the development on it. The ES says that the proposed design scheme has regard to the historic airfield character (s.9.9.5) but there is no assessment of how the airside development would affect the setting of historic buildings except to say that "views will be obscured by the cargo terminal intervening in views to the runway" (s.9.9.5). The ES also acknowledges that the Northern Grass area would also be significantly

changed by substantial buildings, which would block views over the open grassland, which was historically part of the airfield (s.9.9.5).

5.4.2. The only mitigation of the impacts on the historic character of the airfield is the retention of “historic connections through aspects such as street and building names, and an Airport Consultative Committee will be set up” (s.9.9.5) but we think this is inadequate. In our view the historic landscape character of the airfield is likely to have a heritage significance that merits consideration in a decision (ANPS 5.192 and 5.195). We think further survey and assessment of historic landscape character is needed to properly understand its significance and, if it is shown to have considerable heritage significance, that provision be made to preserve some open grassland of the airfield within the development.

5.5. Heritage assets beyond the development site

5.5.1. Historic building beyond the development area may also have their heritage significance harmed by change to their settings, particularly by operational aircraft noise. Historic England agrees that the assessment of noise effects used by River Oak for the purposes of the ES was appropriate. The assessment had regard to appropriate guidance (The Aviation Noise Metric - Research on the Potential Noise Impacts on the Historic Environment by Proposals for Airport Expansion in England; and Good Practice Advice in Planning Note 3).

5.5.2. Scoping for aviation noise impacts initially used a contour that mapped the frequency of maximum noise exceeding a 60dB threshold (N60) and

then the sensitivity of the heritage significance of the asset to noise was assessed (see the ES 9.6.20-9.6.28). Assets which may be sensitive to noise for reasons other than heritage significance, such as residential properties, are assessed within the assessment of operational noise in Chapter 12 of the ES.

5.5.3. We broadly agree with the assessment of the effects of change in Table 9.15 of the ES. There will be some harm to some Listed Buildings as a result of increases in aircraft noise; in particular Cleve Court and Cleve Lodge, Way House and Wayborough House will suffer “significant effects” according to the ES, which we assume will be “less than substantial harm” in the terms of the ANPS. The harm should be reduced as far as possible but it seems possible that residual harm to these heritage assets will remain after mitigation.

5.5.4. There are two Scheduled Monuments in close proximity to the proposed development: the enclosure and ring ditches sited 180m east-northeast of Minster Laundry and the Anglo-Saxon cemetery south of Ozengell Grange. The Scheduled Monuments have national importance but we think that their importance derives principally from their evidential value (i.e. the archaeological potential of buried deposits within their boundary); we do not think that they gain much of their significance from characteristics of their settings (i.e. there is little in their settings that contributes to the understanding and appreciation of their heritage significance). Therefore, while there is a large magnitude of change

within the setting of the scheduled monuments the setting contributes little to their heritage significance and therefore the overall impact on the heritage significance of the scheduled monuments is minor (less than substantial harm).

5.5.5. We do not consider that the heritage significance of heritage assets in Ramsgate or any of the other conservation areas are likely to be much harmed by operational aircraft noise. We expect that any socio-economic effects on heritage assets caused by noise would be addressed by other parts of the ES.

5.6. Design and quantum flexibility

5.6.1. The applicant has said that the scheme can be made flexible enough that harm to nationally important heritage assets could be avoided through changes to the design, such as safeguarding areas for non-harmful land-uses and preserving historic buildings and their settings. For example, paragraph 9.8.11 of the ES assumes that archaeological remains of high significance will be present at one or more locations in the North Grass Area, paragraph 9.8.13 suggests that the zonal approach adopted in the Masterplan will allow for appropriate avoidance and mitigation of impacts, and paragraph 9.8.15 says that the results of archaeological evaluation and detailed construction designs will be used to mitigate adverse effects, including by restricting development layout, design and construction processes.

5.6.2. However, as the development zones identified on Figure 3.6 of the ES seem to have been drawn in response solely to the visual sensitivity of nearby residential property there doesn't seem to be any flexibility described that would facilitate avoidance of harm to the heritage significance of archaeological remains, historic buildings or historic landscape character. Furthermore, a promise to take archaeological remains into account during the detailed designs is not convincing provision for the preservation of a substantial archaeological site. Therefore, while the ES adopts a "worst-case scenario" approach to the initial assessment of impacts on archaeological remains, the proposed quantum of development and design does not provide for sufficient flexibility to allow such impacts to be avoided should further assessment show it to be warranted.

5.6.3. Similarly, there is no clear provision made, as far as we can see, for flexibility to retain and re-use historic buildings, should they be found to warrant preservation. The ES is ambiguous about which, if any, historic buildings will be preserved and whether there is any flexibility to extend preservation following historic buildings surveys. Furthermore, the ES doesn't seem to offer any provision to preserve the historic landscape character of the airfield, or flexibility to do so should it be found to be important enough to warrant it.

6. THE DEVELOPMENT CONSENT ORDER

6.1. The purpose of Historic England's comments on the DCO is to help ensure that heritage assets are appropriately safeguarded and any mitigation measures set out in the DCO appropriately address the likely impacts of the scheme. We suggest that consideration is given to amending some of the draft Requirements, and to create some additional Requirements in order to secure appropriate treatment of heritage assets in the proposed scheme. We would also note that although the lead is likely to be taken by Kent County Council in the discharge of conditions, there may be occasions where it would be appropriate for Historic England to be consulted. We comment as follows:

6.2. *Article 6*

6.2.1. The blanket provision for lateral and vertical deviation in the locations and dimensions of new buildings and other features is not appropriate in our view. This is because the location of important archaeological remains, historic buildings, and historic landscape character could be harmed by some such deviations. However, as heritage surveys are incomplete it is not yet possible to identify places where deviations should be restricted. We suggest that an additional subsection might be added to Article 6, saying "In the light of further heritage assessment, Heritage Constraint Areas in which deviations are restricted will be identified by the applicant in consultation with Kent County Council, and if appropriate Historic England, before they are submitted to the Secretary of State for consideration."

6.3. *Schedule 1*

6.3.1. The floor area and heights of buildings (Work nos. 1, 2, 3, 4, 12, 13, 14, 15, 16, 17, 18 or 20) are of concern to us. This is because if important heritage assets that should be preserved are identified it might be necessary to reduce the quantum of and/or layout of development (see our comments in paragraphs 5.6.1 – 5.6.3). We suggest that further proposals demonstrating the scope for flexibility should be developed by the applicant in consultation with Kent County Council, and if appropriate Historic England, before it is submitted to the Secretary of State for consideration.

6.4. *Schedule 2, Requirement 4*

6.4.1. Historic buildings and the historic character of the airfield could be harmed by the size and appearance of new buildings. We suggest that an additional subsection might be added to say that the external appearance and dimensions of any element of Works that has the potential to affect a Heritage Constraint Area (see para. 6.3.1) should be subject to consultation with Kent County Council, and if appropriate Historic England, before it is submitted to the Secretary of State for consideration.

6.5. *Schedule 2, Requirements 3, 4, 6 & 7*

6.5.1. Archaeological remains, historic buildings and the historic character of the airfield could be harmed by development. We presume that the Development Master Plan, Construction Environmental Management

Plan and Operation Environmental Management Plan will be the principal guides for the implementation of works, in order to avoid unintended impacts and provide for mitigation. Therefore, provision for the investigation, safeguarding and mitigation of impacts on heritage assets should be set out in these documents and they should be subject to consultation with Kent County Council, and if appropriate Historic England, before they are submitted to the Secretary of State for consideration.

6.6. Schedule 2, Requirement 16

6.6.1. We note that this Requirement refers only to archaeological recording intended to mitigate impacts on buried archaeological remains. We think that the scope of this Requirement should be widened to also include recording of historic buildings and their settings in order to mitigate impacts on those heritage assets. The scope of work should include but not be limited to: geophysical survey and archaeological evaluation trenching of the North Grass Area and un-investigated airside areas; extensive strip, map and sample of development areas; full archaeological excavation of archaeological features (where appropriate); historic building recording and analysis of historic buildings.

6.7. Schedule 2, proposed new Requirement

6.7.1. In some instances the preservation of important heritage assets might be appropriate but the ES provides insufficient understanding of the significance of heritage assets to properly inform a decision about when

this would be appropriate. No provision is made in the Requirements for further heritage assessment that would inform the Secretary of State's decision about whether it would be appropriate to alter the quantum or design of development in order to preserve archaeological remains in situ, historic buildings, or visual character and views. Therefore we suggest that it should be required that before the Master Plan is approved the applicant should commission further heritage survey according to Written Schemes of Investigations approved by the Secretary of State in consultation with Kent County Council. The further heritage survey should include desk-based and site-based archaeological assessment, historic building recording and analysis and assessment of the historic character of the airfield.

6.8. Schedule 2, proposed new Requirement

6.8.1. In some instances the preservation of important heritage assets might be appropriate but the applicant has not provided sufficient information in the ES to demonstrate that there is sufficient flexibility in the quantum and design to make this realistically achievable or the means by which it could be achieved. Therefore we suggest that it is required that before the Master Plan is submitted for approval by the Secretary of State the applicant should propose options for building and landscape design, identify flexible zones of harmful and non-harmful land uses, and model the potential to increase the proportion of land in non-harmful land uses. Such information should be subject to consultation with Kent County

Council, and if appropriate Historic England, before it is submitted to the Secretary of State for consideration.

6.9. *Schedule 2, proposed new Requirement*

6.9.1. In some instances the preservation of important heritage assets might be appropriate but no provision is made in the Requirements for the preservation of archaeological remains, historic buildings and historic landscape character, if it is warranted. Therefore we suggest that it is required that before the Master Plan is approved the applicant should make proposals for the preservation and reuse, where appropriate, of important heritage assets, which should be subject to consultation with Kent County Council, and if appropriate Historic England, before they are submitted to the Secretary of State for consideration.

6.10. *Requirement 18*

6.10.1. We query whether 8 weeks is a sufficient period of time for the Secretary of State to consult specialist advisors and reply to the Undertaker in view of the various issues that could arise. We think that a longer period of, say, 12 weeks might be more appropriate.

7. ASSOCIATED DOCUMENTS

7.1. In parallel with these Written Representations we are also submitting answers to the Examining Authority's first written questions.

7.2. We have exchanged with the applicant several drafts of a Statement of Common Ground but have not yet completed it. We will continue discussion with the applicant with the aim of submitting a document by Deadline 4.

8. THE CONDUCT OF FURTHER ASSESSMENT AND LIAISON

8.1. As noted earlier, there are no designated heritage assets within the proposed development site at the present time; however we consider that further heritage assessment work might reveal heritage assets that have a level of importance equivalent to designated heritage assets such as listed buildings or scheduled monuments. We would expect that Kent County Council would take the leading role with the applicant in resolving heritage issues, but that Historic England could advise where we can add value, particularly in relation to any heritage assets that are revealed to be of national importance.

9. CONCLUSIONS

9.1. The proposed development lies within a very rich archaeological landscape, in which numerous archaeological sites of all periods, some of national importance, have been discovered. The airfield was used in the First and Second World Wars and there are important historic buildings relating to aviation on the proposed development site. The open grassland character of much of the airfield evokes its wartime use. There are no designated heritage assets within the proposed development site at the present time; however we think that further heritage assessment work might reveal heritage assets of great, perhaps national, importance.

9.2. There is inadequate understanding of the archaeological significance of the North Grass Area and some areas of the proposed airside development, historic buildings and the historic landscape character of the airfield, which undermines the ability to make informed decisions about the proposed development.

9.3. Where it has not been possible to undertake adequate surveys to assess heritage significance a “Rochdale Envelope” approach to assessing impacts is acceptable; however while a “worst-case scenario” has been identified with respect to buried archaeological remains, we think this is not the case with respect to the historic buildings and historic landscape character of the airfield.

9.4. In view of the inadequate heritage assessment and impact assessment the applicant should provide sufficient flexibility in the scheme quantum and design for any nationally important archaeological remains that may be discovered during the course of future surveys to be preserved as part of the scheme should their importance warrant it (to comply with paragraph 5.191 of the ANPS). We do not think that sufficient flexibility has been identified in the ES.

9.5. Furthermore, we think that the applicant should provide sufficient flexibility in the scheme quantum and design for any nationally important historic buildings and historic landscape to be preserved should their importance

warrant it (to comply with paragraph 5.192 and 5.195 of the ANPS). Again, we do not think that sufficient flexibility for this has been identified in the ES.

9.6. We suggest that consideration is given to amending some of the draft Requirements, and to creating some additional Requirements, in order to secure appropriate treatment of heritage assets in the proposed scheme.

9.7. We would expect that Kent County Council would take the leading role with the applicant in resolving heritage issues, but that Historic England could advise where we can add value, particularly in relation to any heritage assets that are revealed to be of national importance.