

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

Application Ref: TR020002

Response to the Examining Authority's Second Written Questions by the Historic Buildings and Monuments Commission for England (Historic England)

Registration ID No. 20014009

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1.1 The ExA asked the question “As part of their submission to Deadline 4, the applicant submitted an archaeological written scheme of investigation (WSI) [REP4-019]. Do you consider the draft WSI to be satisfactory for setting out a programme of intrusive archaeological works to be carried out as mitigation of the loss of archaeological interest through the disturbance of archaeological remains within the limits of the proposal?”.

1.2 The WSI sets out the archaeological response to potential disturbance of archaeological remains resulting from the construction of the Proposed Development. Within the ‘Northern Grass’ area, archaeological evaluation would be undertaken to inform detailed design of development proposals and to allow appropriate mitigation, whether by design or by investigation and recording, (or a combination of both approaches).

1.3 Where remains requiring preservation in site are identified, the information from the evaluation is intended to allow for an informed design response with appropriate provision for avoidance of these heritage assets, which is appropriate as far as it goes. However, the WSI does not, in itself, make provision for the preservation *in situ* of important remains and does not make it clear what process would ensure that such remains are preserved. We think it is likely that achieving preservation might entail alterations to the quantum and design of the development, which is beyond the scope of a WSI.

1.4 Within areas of the site other than the Northern Grass, proposals for mitigation by investigation and recording are set out in principle to allow detailed mitigation design once detailed design is complete. In these areas no allowance is made for the preservation of important heritage assets should they be discovered, whether they be archaeological remains, historic buildings or airfield character.

1.5 The WSI provides a general framework for archaeological mitigation in the expectation that more detailed provision will be made in due course when more detailed designs are available and in this it is adequate in our view. **However, the WSI does not provide for the preservation of important heritage assets should they be discovered.** The application overall remains inadequate because it does not make provision for the conservation of important heritage assets that warrant preservation.

1.6 In particular, there is still no clear provision made in the application to alter the quantum or design in order to preserve archaeological remains, buildings and airfield character. Furthermore, the WSI makes no provision for the preservation and re-use of important heritage assets, such as historic buildings, should further surveys show them to warrant preservation.

1.7 We consider that 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). This should include options for building and landscape design such as flexible zones of land-use and modelling of the potential to increase the

proportion of land in non-harmful land-uses. 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 be confirmed by further surveys to be of a level so as to require this.

1.8 In our Written Representations we recommended some other provisions to ensure that important heritage assets would be preserved but we note that these are not included in the revised DCO. In particular:

- a. No amendments to the DCO have been made to reduce the risk to heritage assets that might arise from the proposed limits of deviation. 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.”

- b. No amendments to the DCO have been made to reduce the risk to heritage assets or their settings that might arise from the size of and design of proposed structures. 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.

- c. No amendments to the DCO have been made in response to our suggestion that sign-off of the Master Plan should be dependent on adequate provision having been made for heritage surveys, options modelling and preservation. We suggest that it should be required that before the Master Plan is approved the applicant should commission further assessment of the historic character of the airfield and model the options for increasing the proportion of land in non-harmful land-uses in response to the result of heritage surveys.