

No.	Question	Response
DCO.2.2	<p>The Revised 2.1 Draft Development Consent Order submitted at Deadlines 3 [REP3-186] on 22 February 2019 and 5 on 29 March 2019 [REP5-index number to be allocated] includes additional references to Kent CC at Requirements 13(1), 13(2), 16(5) and 16(6).</p> <p><b>i. Is Kent CC content to be referenced in the parts of the draft DCO?</b></p> <p><b>ii. Are there other parts of the draft DCO at which Kent CC would justifiably wish to be referenced either as a body to be consulted or as an approving body?</b></p>	<p><b>i.</b> Requirements 13 (1)/(2): KCC is content that the wording is appropriate and sufficient. If KCC's approval is required, that would ensure any of our requirements are delivered. Reference is made to water quality, but not drainage operations.</p> <p>KCC considers that Paragraph 13 (1) could be improved to include '<b>and drainage operation</b>' after 'pollution control and monitoring', as this is responsive to Environment Agency (EA) concerns.</p> <p>Requirements 16 (5)/(6): KCC is content to be referenced in the draft DCO with respect to Requirement 16 'Archaeological remains'. KCC should monitor the implementation of the Written Scheme of Investigation, the meeting of standards and report to the Secretary of State on the satisfactory completion of works, reports and the suitability of method statements and proposals for investigations and post excavation works.</p> <p><b>ii. Are there other parts of the draft DCO at which Kent CC would justifiably wish to be referenced either as a body to be consulted or as an approving body?</b></p> <p>No other parts of the DCO have currently been identified as needing to reference KCC at present.</p>
DCO.2.42	<p><b>Schedule 2 – Requirements</b></p> <p><b>Requirement 16 – Archaeological remains</b></p> <p>The Relevant Representation from Kent CC [RR- 0975] states that:</p> <p><i>“a DCO requirement should cover the need to preserve the archaeology including through adjustment of development parameters as well as covering the necessary stages of evaluation and investigation. The requirements should also cover extensive investigation of those areas of the airport where archaeology will be affected by</i></p>	<p>(i) KCC considers that Requirement 16 in its present form does not fulfil these requirements.</p> <p>(ii) KCC suggests the following draft wording is included in Requirement 16 to cover evaluation and preservation in situ:</p> <p><i>16 (1) Prior to the submission of details of the final design, parameters and quantum of development in:</i></p> <ul style="list-style-type: none"> <li>• <i>The area of development proposed north of Manston Road known as the North Grass Area;</i></li> <li>• <i>The location of the helicopter facility in the south east of the site</i></li> <li>• <i>The area proposed for HGV access and earthworks north of the western runway were not tested through trial trenching but had significant geophysical survey results;</i></li> </ul>

	<p><i>development but is not to be preserved in situ. The County Council welcomes the intention to agree a Written Scheme of Investigation for future archaeological investigations.”</i></p> <p><b>i. Do you consider that Requirement 16, as drafted in the Revised 2.1 Draft Development Consent Order submitted at Deadline 5 on 29 March 2019 [REP5-index number to be allocated], fulfils these requirements?</b></p> <p><b>ii. If not, provide suggested draft wording.</b></p>	<p><i>and</i></p> <ul style="list-style-type: none"> <li>• <i>The area proposed for a contractor’s compound and later car parking;</i></li> </ul> <p><i>A programme of archaeological field evaluation works shall be carried out in that area and reported in accordance with a specification which has been submitted to and approved by the Secretary of State in consultation with Kent County Council and Historic England.</i></p> <p>(2) <i>Where archaeological evaluation works referred to in sub-paragraph (1) identify remains that are of a significance to warrant preservation in situ, as advised to the Secretary of State by Kent County Council and Historic England, the design, parameters and quantum of development in that area will be adjusted to ensure the appropriate preservation in situ of the archaeological remains.</i></p> <p>The areas listed above in sub paragraph (1) could be included on a drawing that is referenced in the requirement.</p> <p>The Written Scheme of Investigation referred to in Requirement 16 should adequately fulfil the requirement where investigation and recording is the appropriate mitigation measure and the draft Written Scheme of Investigation in general covers what is needed.</p>
DCO.2.43	<p><b>Schedule 2 – Requirements</b></p> <p><b>Requirement 16 - Archaeological remains</b></p> <p>In its response to DCO.1.4 [REP3-139] Kent CC stated that:</p> <p>KCC can provide some wording into Requirement 16 that allows for preservation following evaluation of those areas but would need to be sure that this does not counter the principle of the permitted development and make the requirement unworkable. It would be best to agree this requirement with Historic England.</p> <p><b>i. Provide a report on any actions consequent on this offer.</b></p>	<p><b>(i)</b> Suggested draft wording is set out in response to DCO.2.42 above. This seeks to have evaluation carried out at an early stage in scheme design such that the results of the evaluation can inform that design. It may be that there are areas such as in the North Grass Area where the quantum of development would need to be reduced to accommodate the preservation of significant archaeology there if present. The applicant, in discussion, has stated that this can be accommodated, however this has not been demonstrated in the application. The Secretary of State, when confirming the DCO, will need to be satisfied that the requirement to reduce the quantum of development or adjust parameters can be achieved.</p> <p><b>(ii)</b> The draft wording provided in DCO.2.42 above has not yet been agreed with the applicant.</p>

	ii. Provide any draft agreed wording.	
DCO.2.46	<p><b>Additional Articles or Requirements</b></p> <p>The ExA is considering inserting a new Article under principal Powers which specified that the operation of the airport is subject to a total annual air transport movement limit and is subject to a total annual General Aviation movement limit.</p> <p>The quantum of these limits will be set out by the ExA in further drafts of the DCO following further Examination through Written Questions and Issue Specific Hearings.</p> <p><b>Comment.</b></p>	<p>KCC welcomes the ExA considering inserting a new Article under principal Powers that will specify that the operation of the airport is subject to a total annual air transport movement limit and is subject to a total annual General Aviation movement limit.</p> <p>Total movement limits should be specified for the night time period, as previously stated by KCC in the Local Impact Report – <i>“Whilst the voluntary [night] noise quota gives a commitment on the level of noise over a year, there is no corresponding movement limit. For example, the quota could be met by any of 6,056 QC/0.5 aircraft, 3,028 QC/1 aircraft (twice as noisy) or 757 QC/4 aircraft (eight times as noisy as QC/0.5) over the year. Residents could be concerned about how many movements they should expect.”</i></p> <p>The total movement limits should also take account of seasonal variation, as previously stated by KCC in the Local Impact Report –</p> <p><i>“There is also no seasonal split in the noise quota so theoretically it could be fully utilised in a winter season (where demand is expected to be higher). So, although we accept that the average busiest night in the winter would be 7 air transport movements, there is no mechanism in the NMP [Noise Management Plan] to fully assure this.”</i></p>
DCO.2.47	<p><b>Additional Articles or Requirements</b></p> <p>The ExA is considering inserting a Requirement into the draft DCO stating that an aircraft cannot take-off or be scheduled to land at night between 2300 and 0600 and that ‘scheduled’ be defined in Requirement 1 – Interpretation.</p> <p><b>Comment.</b></p>	<p>KCC welcomes the ExA considering inserting a Requirement into the draft DCO, stating that an aircraft cannot take-off or be scheduled to land at night between 2300 and 0600, as previously stated by KCC in the Local Impact Report –</p> <p><i>“Night noise is by far the least acceptable form of aviation noise. On a typical busy day in year 20, the applicant is forecasting the airport to handle 79 air transport movements. By year 20, during the night 16,465 dwellings are in the Lowest Observed Adverse Effect Level (LOAEL) and 225 above the Significant Observable Adverse Effect Level (SOAEL). Further, 160 dwellings will be exposed to 5 – 9 events in excess of 60dB during the night. This is likely to result in annoyance, and for those significantly adversely affected may result in health impacts ranging from sleep disturbance and stress to cardiovascular conditions. It is therefore vital that an appropriate level of mitigation is offered in terms of insulation and relocation assistance, as well as community involvement in airspace design including potential for respite, <b>restrictions in night flights</b>, and runway preferencing in low wind conditions. Communities affected must know what to expect from a reopened Airport in terms of noise impacts because unexpected noise impacts are more noticeable and cause greater disturbance</i></p>

<p>DCO.2.48</p>	<p><b>Additional Articles or Requirements</b></p> <p>The ExA notes that the Register of Environmental Actions and Commitments [APP-010] references:</p> <p><i>“Measures to optimise local recruitment during construction and operation, including possible measures to ensure linkages to local training initiatives and/or voluntary agreements relating to local recruitment.”</i></p> <p>The ExA notes the reference in the Preliminary Meeting of the need to consider ‘education’ as well as training and the subsequent inclusion of this word in the list of Principal Issues.</p> <p>The ExA is considering inserting a Requirement into the draft DCO requiring the drawing up and implementation of policies and programmes relating to the employment of local labour and the provision of training and education schemes.</p> <p><b>i. Comment on the value and implementability of such a Requirement.</b></p> <p><b>ii. If agreeable to such a Requirement, provide wording that may be acceptable to the Applicant.</b></p>	<p><b>(i)</b> Given the increased demand for skills in the area, contractors need to ensure both the delivery of skilled workers for the project and the opening of opportunities for the local workforce and supply chain.</p> <p><b>(ii)</b> Investment should be made into the local area to improve training and skills provision and a commitment made to ensure that local people are supported in both finding and taking advantage of the opportunities provided by the project. This investment includes:</p> <ul style="list-style-type: none"> <li>- The creation of apprenticeships totalling 3% of the workforce;</li> <li>- Traineeships and work placement opportunities;</li> <li>- Support for local schools and colleges in curriculum development;</li> <li>- The addition of Enterprise Advisors into the Kent and Medway Careers Enterprise Company (CEC) network; and</li> <li>- Attendance and support of the Kent and Medway Employer Guilds.</li> </ul>
<p>DCO.2.50</p>	<p><b>Additional Articles or Requirements</b></p> <p>The ExA is considering whether it should be a requirement that the authorised development must not be commenced until measures set out in sections 2, 3, 4 and 5 of the revised Noise Mitigation Plan have been implemented.</p> <p><b>Comment.</b></p>	<p>KCC welcomes the ExA considering whether it should be a requirement that the authorised development must not be commenced until measures set out in sections 2,3, 4 and 5 (relating to residential properties, noise-sensitive buildings, schools liaison and the purchase and relocation assistance scheme) of the revised Noise Mitigation Plan have been implemented.</p>

<p>HE.2.6</p>	<p><b>Draft Written Scheme of Investigation</b></p> <p>As part of their submission to Deadline 4, the applicant submitted an archaeological written scheme of investigation (WSI) [REP4-019].</p> <p><b>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?</b></p>	<p>KCC considers that, in general, the draft Written Scheme of Investigation is satisfactory in setting out a programme of archaeological works that would mitigate the loss of archaeological interest through the disturbance of archaeological remains in those areas where it can presently be said that a programme of investigation and recording is an appropriate response.</p> <p>The draft Written Scheme of Investigation sets out proposals for evaluation of the Northern Grassed Area, which would need to be implemented to inform design, quantum and parameters of development in that area. Likewise, there are other areas where KCC has identified preservation or evaluation to inform whether the need for preservation is required and these need to be clarified and accommodated in the Written Scheme of Investigation.</p> <p>KCC's archaeologists are presently reviewing the Draft Written Scheme of Investigation and will provide comments on the scope, approach and technical details to the applicant's archaeological consultants and will work with them and Historic England towards achieving an agreed Written Scheme of Investigation.</p>
<p>LV.2.4</p>	<p>The Local Impact Report from Kent CC [REP3-143] states at paragraph 4.16 that:</p> <p><i>"...within the present Masterplan the visual relationship of the museum area and the runway will be severed by the proposals with the construction of the cargo hangers and open aspects to the north and east lost through the construction in the North Grass Area".</i></p> <p>The Applicant's response to LV.1.10 states that:</p> <p><i>"A 45m buffer zone between site boundary and new buildings has been allowed for in the masterplan. This significantly reduces the developable area available but has been committed to in part to ensure the development is sympathetic to the local area."</i></p> <p><b>Do you consider that this buffer zone would serve in part to maintain the integrity of the</b></p>	<p>KCC considers that the creation of the buffer zone will help, in part, to reduce the effects of enclosure, but the general openness of the setting of the heritage assets and museum area will still be lost. The loss of visual connection with the runway and active airfield will be mostly severed by the cargo hangers. The creation of a museum area that integrates with the main built heritage assets is a positive contribution, but it will be detached visually from much of the airfield.</p>

	<p><b>airfield as a historic area?.</b></p>	
<p>NS.2.10</p>	<p><b>Noise insulation and ventilation in schools</b></p> <p>The Applicant states at paragraph C 2.14 of the Noise Summary submitted at Deadline 5:  <i>“The revised Noise Mitigation Plan included an express provision for schools to apply to the Community Consultative Committee for funds from the Community Trust Fund. In addition a schools liaison programme is now included in the Noise Mitigation Plan.”</i></p> <p><b>i. Can the Applicant explain why are schools not part of the Applicants’ direct insulation and ventilation scheme?</b></p> <p><b>ii. Can Kent CC provide an estimate of the potential costs associated with insulating and ventilating a primary school in Kent?</b></p>	<p>-</p> <p><b>(ii)</b> There are a number of parameters that would affect the level of insulation, the mechanical plant attenuation, and the following points would need to be established in order to provide a more accurate price, such as:</p> <ul style="list-style-type: none"> <li>• The size and orientation of school buildings;</li> <li>• Whether the school is one or two form entry;</li> <li>• The age and condition of the building/s;</li> <li>• Whether there are temporary buildings or permanent temporary buildings on site;</li> <li>• Whether the buildings are single storey or two storey;</li> <li>• What type of improvements are required (such as retrofitting mechanical ventilation systems, glazing or façade/roof insulation improvements);</li> <li>• The proximity of the buildings to the noise source; and</li> <li>• Whether planning application fees will have to be paid if additional plant or façade changes are required.</li> </ul> <p>Nonetheless, as a budget, KCC would suggest a figure of £300,000. A very high-level breakdown would include the following:</p> <ul style="list-style-type: none"> <li>• Glazing upgrade (secondary) - £50K</li> <li>• Noise insulation (roof) - £50K</li> <li>• Ventilation plant and attenuation – £100K</li> <li>• General BWIC, making good etc £25k</li> <li>• Prelims, attendances etc - £50K</li> <li>• Fees and approvals £25K</li> </ul> <p>Excluded from the estimate:</p> <ul style="list-style-type: none"> <li>• Worst case scenarios, such as if the site is directly under take-off path;</li> <li>• The cost of works, if alternative accommodation is required whilst works are carried out. There may be some difficulties if there is a lot of existing roof plant or PVs to consider; and</li> <li>• Plant may require additional power supplies, depending on what capacity is available.</li> </ul> <p>KCC would also suggest that secondary schools would also need to be considered in respect of potential costs.</p>