

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

Application Ref: TR020002

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

Registration ID No. 20014009

Our Ref: PA00513760

Dated: 27 June 2019

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1. QUESTION DCO.4.8 – Article 6 & Requirement 3.

1.1. The ExA requested that the Applicant and Historic England submit a mutually acceptable form of words in their responses to the ExA's second draft DCO.

1.2. In an email of the 21 June 2019 Historic England suggested to the applicant an alternative wording for these two clauses, which is set out below. This was acknowledged by the applicant but at the time of writing (27 June) we have not yet received a further response.

1.3. Article 6 – Limits of deviation:

“(3) Deviations will be restricted where they are likely to harm Heritage Constraint Areas, which are defined as areas containing heritage assets of national importance and their settings. Heritage Constraint Areas will be identified by the applicant in consultation the relevant planning authority, Kent County Council and Historic England following the heritage assessment undertaken to inform the masterplan and before the masterplan is submitted for approval. Areas containing archaeological remains of national importance that are discovered during subsequent archaeological mitigation work can also be defined as Heritage Constraint Areas by the relevant planning authority who will be advised by Kent County Council and Historic England.”

1.3.1. Historic England would not object to this provision being a Requirement rather than an Article if the ExA think it appropriate.

1.4. Requirement 3 – Development Masterplan:

“(3) Before the Master Plan is submitted the applicant should commission further assessment of the historic character of the airfield, historic buildings survey, and archaeological investigation, and assess the heritage significance of heritage assets and their settings. Heritage assets of national importance should be preserved in situ by means of amendments to the design, parameters or quantum of development. The applicant should consult the relevant planning authority, Kent County Council and Historic England before submitting the masterplan for approval and report on the consultees’ recommendations in the submission.”

2. QUESTION HE.4.1 – Non-designated heritage assets.

2.1. The ExA requested comments on the justification for the proposed removal of the T2 Hangar and WWII Dispersal Bay.

2.2. It remains Historic England’s view that no clear and convincing justification has been offered for the removal of the T2 Hangar and WWII Dispersal Bay and that survey and assessment are necessary. We have had no further discussion with the applicant on this subject.

3. QUESTION 4.2 – Draft Written Scheme of Investigation.

3.1. The ExA asked for an update on discussions relating to the draft WSI, including the provision of a new WSI, if required.

3.2. Historic England does not object to the WSI and has no further comments to make about it. We will be content for the applicant to finalise the details with Kent County Council.

4. QUESTION Tr.4.13 – Alternative Manston to Haine Link Road.

4.1. The ExA asked whether KCC and Historic England accept the points made by the applicant in respect of heritage benefits arising from safeguarding a wider road corridor.

4.2. We assume that the applicant refers to the potential benefits of safeguarding alone i.e. they do not attempt to anticipate what effect road construction might have if it occurs in the safeguarded area. We concur that in these circumstances a wider road corridor might set-aside from development more land than would otherwise have been the case, and thereby might offer more potential for the preservation of archaeological remains. However, the location of the road corridor is not flexible and so whether it provides heritage benefit would be a matter of chance.

4.3. In the event that a road is built a wider road corridor might provide a greater opportunity for avoidance of harm to buried archaeological remains by means of small adjustments to the route of the road or the design or location of ancillary features, such as landscaping and drainage. In practice, the scale of the benefit will depend on the location, scale and nature of affected

archaeological remains and the capacity for adjustment of the road and ancillary features.