



RiverOak Strategic Partners

Manston Airport Air Freight Hub

*Reviving strategic transport infrastructure to
maximise Global Britain's trading potential*

**Applicant's Redetermination
Submission as requested by
the Secretary of State**

Appendix 2

Project: Manston Airport Development Consent Order
Document Ref: TR020002/RED2/SoSReq/APP2
Redetermination Deadline Date: 3 December 2021

Technical note:

Manston Airport: Historic Environment

1. Introduction

- 1.1.1 This technical note has been produced to set out a response to the Secretary of State's letter dated 21 October 2021 regarding the consultation on the Independent Aviation Assessor's draft report on the Manston Airport DCO and the representations received on the Statement of Matters.
- 1.1.2 In this letter, the Secretary of State requested, "*...the Applicant to confirm whether it is satisfied that its assessment of the impacts on the historic environment and heritage assets submitted in support of the application remains current, or where deemed necessary to submit any updated information.*"

2. The Application Baseline

- 2.1.1 Chapter 9 of the Environmental Statement [[APP-033](#)] set out an understanding of the potential for archaeological remains to be present within the site (sections 9.6.14 – 9.6.16). This drew on evidence which is discussed in more detail in the desk-based assessment [[APP-049](#)].
- 2.1.2 The ES concluded that there was a potential for archaeological remains of high significance, including remains of equivalent significance to scheduled monuments (*cf.* ANPS 5.191), to be present within the site. This assessment, remained common ground with Historic England and Kent County Council through the examination process.
- 2.1.3 The results of archaeological evaluation undertaken to support the Stonehill Park mixed-use development application became available during the examination (AOC Archaeology 2016 and 2017). This reporting provided some further detail but did not alter the overall conclusion of the potential significance of archaeological remains within the site.
- 2.1.4 The potential that substantial harm to significance could arise where these remains were located in areas that would be disturbed by the proposed development was considered. There has, however, been extensive disturbance within the site caused by the construction and operation of the airfield over the course of the twentieth century, and when taken with the flexibility in the design of the proposed development, it was concluded that significant adverse effects could be avoided. During the examination, appropriate measures to secure mitigation through avoidance and archaeological investigation were agreed with KCC and Historic England. These measures are set out in Requirement 3 of the draft DCO.

3. The influence of works subsequent to the completion of the DCO examination

- 3.1.1 Kent County Council's response to the Secretary of State references "*major excavations happening in relatively close proximity to the application site*". These include works such as the recent high-profile excavation of the amphitheatre and associated settlement at the Roman fort at Richborough Castle.
- 3.1.2 The baseline information from these more recent works would provide only contextual material which highlights the archaeological sensitivity of the Isle of Thanet in general and the Sarre – Manston ridge in particular. This information could not, however, provide additional evidence to confirm what archaeological remains are present within the site nor to what extent construction and operation of the airfield had caused disturbance to any remains which may be present.
- 3.1.3 The archaeological work undertaken by AOC Archaeology in support of the Stonehill Park mixed-used development application, comprising archaeological geophysical survey and evaluation trenching (AOC Archaeology 2016 and AOC Archaeology 2017) which was referenced during the DCO examination remains the most extensive and thorough archaeological field survey of the site undertaken to date.

4. Conclusion

- 4.1.1 The archaeological investigations noted by Kent County Council, while of interest, do not provide any specific evidence for what archaeological remains are present within the Manston site.
- 4.1.2 These more recent works do not affect ES conclusion that highly significant archaeological remains may be present within the site. This is acknowledged in the KCC response; "*However, this is not considered to have a particular bearing on the consideration of the site as it is already known that the potential is high.*"
- 4.1.3 It is therefore concluded that these more recent investigations do not affect the ES conclusion that archaeological remains are present within the site and that some of these remains may be of equivalent significance to a scheduled monument. These investigations also do not affect the site-specific mitigation measures agreed with KCC and Historic England and set out in Requirement 3 of the draft DCO.
- 4.1.4 The evidence base for the historic environment assessment of the proposed development therefore remains current.

Issued by



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Document revisions

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