

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

Application Ref: TR020002

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

Registration ID No. 20014009

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1. QUESTION E.1.8 - INCOMPLETE SURVEYS

1.1. The ExA asked the question “What limitations and uncertainty do these incomplete surveys introduce into the EIA?”.

1.2. Archaeology

1.2.1. Incomplete surveys mean that it is impossible to be sure about the presence/absence, character and heritage significance of archaeological remains. Therefore, an informed decision about whether the effect of the development on heritage assets is justified cannot be made. The EIA’s “worst-case” assessment of effects assumes the presence of archaeological remains and that they have a high level of significance; however it makes no predictions about their location, extent, depth, robustness, or period/type, which would be important factors in deciding how they might be preserved by amending the design, and how residual impacts on them might be mitigated.

1.3. Buildings

1.3.1. Enough information is available to indicate that there are certainly some important historic buildings on the airfield. It is Historic England’s view, on the basis of this information, that the T2 Hangar, WWII Dispersal Bay, RAF Manston Control Tower and the RAF Manston WWII Battle HQ are potentially nationally important and if so should be preserved. However, the relatively superficial survey on which the ES depends might prove to either underestimate or overestimate of the level of significance

for each building so decisions about which buildings should be preserved may not be well-founded with the result that unjustified harm might be caused or unjustified constraints on development might be imposed. Additionally, the ES is not clear about the applicant's proposals for which buildings would be demolished or retained, so consideration of the likely impact of the development is made doubly difficult.

1.4. Historic character

1.4.1. The paucity of information available about the historic landscape character of the airfield makes it very difficult to judge whether the large change to landscape character that would be caused by the proposed development is justified. Historic England and the applicant disagree about the nature of this character and the level of heritage significance that should be assigned to it but there is no evidence to support either opinion. It is likely that the preservation of historic airfield character, the setting of historic buildings and key views could be achieved through change to the design but if so changes to the quantum and design may have to be considerable.

2. QUESTION HE1.5 - HERITAGE ACTION ZONE

2.1. The ExA asked the question "What effect, if any, do you consider the scheme would have on aims of the Heritage Action Zone?".

2.2. We do not consider that the heritage significance of heritage assets in Ramsgate are likely to be harmed by operational aircraft noise. Furthermore, we do not think that the Heritage Action Zone Projects with which we are currently involved are likely to be undermined by such noise.

3. QUESTION HE.1.22 - NON-DESIGNATED ASSETS WITHIN THE AIRPORT

3.1. The ExA asked the question “What clear evidence is there that the non-designated heritage assets within the airfield have a significance that merits consideration in the decision?”.

3.2. In the central and southern parts of the airport (south of Manston Road) archaeological survey and evaluation excavation has been undertaken and the results published, which we understand provides a useful indication of the likely heritage significance of buried archaeological remains there (although it did not cover all areas that would be impacted by the present DCO proposals).

3.3. Unfortunately, in the Northern Grass Area little archaeological survey and evaluation has been done, and that which has been done is apparently not available to us or the applicant. However, we believe that the airport lies within a very rich archaeological landscape in which numerous designated and non-designated archaeological sites of national importance have been identified and it is highly likely that archaeological remains of similar type and significance will also be found within the airport itself. Therefore, while there

is little clear evidence yet for archaeological remains that have significance that merits consideration in the decision we think that this is likely to change following further survey and assessment.

3.4. The airfield is known to contain important historic buildings dating from its wartime use as an airfield but the actual level of significance of these buildings cannot properly be confirmed without historic recording and analysis. Therefore, there is some clear evidence that historic buildings have significance that merits consideration in the decision and further survey might produce more.

3.5. We believe that the historic landscape character of the airfield, which enables understanding and appreciation of its wartime use, has some heritage significance. The open grassland of the airfield is also the setting for, and contributes to the heritage significance of, the wartime buildings. However, no survey or assessment of the historic character has been undertaken so there is no clear evidence yet that historic landscape character has a significance that merits consideration in the decision but further survey might produce some.