

Manston Airport DCO: Comments on responses to the Examining Authority's First List of Questions - Historic Environment

Ref	Question	Response	Comments
HE.1.4	<p>Conservation Areas</p> <p>Paragraph 9.6.18 of the ES, Volume 1, Chapter 9 [APP-033] identifies Ramsgate Conservation Area as potentially subject to significant adverse indirect effects. However, Table 9.15: Assessment of effects arising through change to setting of designated heritage assets, does not include an assessment for Ramsgate Conservation Area.</p> <p>Q: Detail the effects that you consider the proposed scheme would have on the character and appearance of the Ramsgate conservation area</p>	<p>Applicants' Response:</p> <p>An initial scoping appraisal of the potential effects of the Proposed Development on the significance of the Ramsgate Conservation Area is set out at Table 5.1 and Table E.3 of Appendix 9.1 of the ES (APP-051). Table 5.1 noted with regard to visual effects that 'Visibility between all of these conservation areas and the airfield is obscured by topography, vegetation and the built environment... As settlements, they produce light pollution. This is greater in the larger settlements of Ramsgate and Broadstairs. Changes to the proposed site should have no effect on the setting of these assets'.</p> <p>Table E.3, considering the effects of aviation noise noted that 'Ramsgate conservation area comprises the historic core of a busy resort and port town. In the majority of the area, the existing soundscape is provided largely by traffic noise with occasional noise from harbour and marina operations, which reinforce the area's historic and functional links with the sea.</p> <p>The majority of this area is not sensitive to altered levels of background noise, and the noise relating to port operations would not be affected by the relatively low noise levels predicted. Consequently, aviation noise is not considered likely to give rise to any perceptual change in the setting of the area and no adverse effects are anticipated.'</p>	<p>Ramsgate Society and RHDF:</p> <p>The issue of visual effects has nothing to do with the appearance of the airport site which, as stated, is not visible from the Ramsgate Conservation Area. Rather, it is crucially about the impact of low flying aircraft, landing and taking off from the airport, given the direction of the eastern flight path which cuts a swathe across the conservation area. In this respect there is clearly a significant negative visual impact given the proximity of the airport to the conservation area and the intensity of ATMs forecast at Year 20.</p> <p>There is doubt, as we explain in our comments on HE'S Written Representation, as to whether the noise matrix utilised by the applicant has been correctly applied given Manston airport is and has been unused for aviation purposes for 5 years. That aside the applicants' statement is unsupported when account is taken of the consultants' overall conclusion on noise, viz:</p> <p><i>In these communities (Ramsgate..), aircraft noise would increase to the point where there would be a perceived change in quality of life for occupants of buildings in these communities or a perceived change in the acoustic character of shared open spaces within these communities (Para 4.1.47 Volume 5 Non-Technical Summary TR020002/APP/5.1)</i></p> <p>In our opinion the applicants response is completely disingenuous and we ask the Ex A to allow The Society and RHDF to address the panel in order to give an assessment of the damage which would ensue to the character and appearance of the Ramsgate Conservation Area.</p>
HE1.5	<p>The Heritage Action Zone in Ramsgate looks to achieve economic growth by using the historic environment as a catalyst</p> <p>Q: What effect, if any do, you consider the scheme would have on aims of the Heritage Action Zone?</p>	<p>Applicants' Response:</p> <p>The Heritage Action Zone (HAZ) is not a heritage asset within the definitions set out by ANPS or NPPF, and is instead identified as an area where heritage assets are used as a focus for economic regeneration. Effects on heritage assets, as defined by the Airports NPS, within the HAZ have been assessed as set out in ES Chapter 9 Historic Environment (APP-033) in line with the agreed scope and methodology for historic environment assessment and no significant adverse effects were identified.</p>	<p>Ramsgate Society and RHDF;</p> <p>As stated above the applicants statement is unsupported in the face of its consultants' overall conclusions on noise viz</p> <p><i>In these communities (Ramsgate..), aircraft noise would increase to the point where there would be a perceived change in quality of life for occupants of buildings in these communities or a perceived change in the acoustic character of shared open spaces within these communities (Para 4.1.47 Volume 5 Non-Technical Summary TR020002/APP/5.1)</i></p>

<p>HE1.5</p>	<p>The Heritage Action Zone in Ramsgate looks to achieve economic growth by using the historic environment as a catalyst</p> <p>Q: What effect, if any do, you consider the scheme would have on aims of the Heritage Action Zone?</p>	<p>Historic England’s Response :</p> <p>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.</p>	<p>Ramsgate Society and RHDF:</p> <p>We are at a loss to understand how Historic England (HE) has managed to reach this conclusion. It has clearly failed to have regard to its own guidance on <i>The Setting of Heritage Assets (Historic Environment Good Practice Advice in Planning Note 3 (Second Edition))</i> in which it is made plain that changes in the setting of heritage assets can effect the significance of the asset. And that it is not just visual changes which may have an impact but also may be ... <i>influenced by other environmental factors such as noise, dust and vibration (Part 1: Settings and Views)</i>. The guidance goes on to make clear that ..<i>the economic viability of a heritage asset can be reduced if the contribution made by its setting is diminished by badly designed or insensitively located development. For instance, a new road scheme affecting the setting of a heritage asset.. (para 9)</i></p> <p>Sustainability is the key issue here. The designation of Ramsgate as a Heritage Action Zone gives confidence to homeowners and investors of a more positive economic future for the town. That confidence – crucial to ensuring the continued maintenance and improvement of its 456 listed buildings and structures – is undermined completely by the prospect of a 24/7 air cargo business opening at Manston airport. It is very doubtful whether the £4m or more investment made by Wetherspoons in the restoration and improvement of the Royal Pavilion in The Royal Harbour, commenced in 2016 and completed a year later, would now take place. Nor is it likely that the steady growth of incoming and economically active households, mainly from London, attracted to the historic and affordable housing stock would continue placing at risk the sustainability of much of the Ramsgate central conservation area.</p> <p>In the light of these two completely inadequate and erroneous responses we ask the Ex A to allow The Society and RHDF to address the panel in order to give an assessment of the risk posed to the objectives underpinning the HAZ should the DCO be approved.</p>
<p>HE.1.16</p>	<p>Listed Buildings</p> <p>RR-1342 states “Plains of Waterloo is a road of Georgian houses of architectural merit, it bisects Wellington Crescent – an important Georgian crescent comparable in</p>	<p>Applicants’ Response:</p> <p>It is not considered that the Proposed Development would give rise to harm to the significance of the Plains of Waterloo and Wellington Crescent. These assets were considered in the scoping appraisal presented at Table E.3 of Appendix 9.1 (APP-051), and were not taken forward for more detailed assessment for the reasons summarised</p>	<p>Ramsgate Society and RHDF:</p> <p>The applicants’ response provides a good and detailed description of these heritage assets. However we do not agree with their view about the impact of 24/7, heavily laden 747s low flying over these assets. Noise levels of 80 decibels and more were regularly recorded when the airport was last in use and when account is taken of their own</p>

	<p>architectural importance to the Royal Crescent in Bath. It is my belief that the high volume of flights proposed for the re-opening of Manston Airport will have a deleterious effect upon the structures in this area”.</p> <p>Q:What impacts do you consider the Proposed Development would have on the listed buildings sited on the Plains of Waterloo and Wellington Crescent in Ramsgate?</p>	<p>below.The two blocks which comprise Wellington Crescent and the majority of buildings along the Plains of Waterloo are listed at Grade II, with a small number of non-designated buildings. These buildings are of high significance for architectural interest and also derive considerable historic interest from their survival as a coherent group which is illustrative of early 19th-century urban design, the development of Ramsgate as a seaside resort and of the historic links to the Napoleonic Wars as commemorated in the street names and the ‘Iron Duke’ public house. The setting of these structures contributes to significance primarily through close views of these assets in which their architectural and historic interests can be best appreciated, and in the case of Wellington Crescent, of views over the seafront and harbours. The baseline noise environment is that of a busy urban conservation area, particularly Wellington Crescent, which is located along a principal vehicle route through the town. The Proposed Development would not give rise to any change to the structure of these buildings, and would not discernibly affect any features of historic or architectural interest. Similarly, the historic links between these buildings, the growth of Ramsgate and the contemporaneous historical events from which they are named would not be affected. While there would be a discernible change in the noise environment, this would not affect the contribution of the setting of these assets to significance and no harm would arise</p>	<p>conclusions on noise (previously stated) ,the impact becomes clear: a declining interest from existing and prospective owners to invest in maintenance and necessary improvements with the inevitable decline and decoration of these historic buildings.</p>
HE.1.17	<p>Listed Buildings RR-0890 and RR-0794 raise the issue of sound proofing listed buildings, considering that listed buildings would not be able to be double glazed or secondary glazed.</p> <p>Q: How do you consider that the Dwelling Noise Insulation Scheme would deal with potential required sound insulation improvements to other listed buildings?</p> <p>Q: If not, what are the alternatives to noise insulation for such properties to mitigate harm from noise?</p>	<p>Applicant’s Response:</p> <p>i. It is not considered likely that the Dwelling Noise Insulation Scheme (DNIS) would apply to any of the listed buildings identified as not subject to significant adverse effects in Chapter 9 of the Environmental Statement (APP-033). Consequently, mitigation would not be offered under the terms of the DNIS. Similarly, noise mitigation would not be offered under other mitigation schemes where no significant adverse effects have been identified.</p>	<p>The applicants’ Noise Mitigation is largely based on a draft 2014 NAP which provides for compensation to be payable for buildings effected by noise disturbance over 57db LAeq. The NAP report shows the 57 db LAeq day contour extending 1.8km from the Eastern edge of the runway over Nethercourt / St Lawrence. As a result none of Ramsgate’s listed buildings and structures would be eligible.</p> <p>When comparing other single runway airports, eg Bristol, Gatwick, Stansted's, the 2015 day 57db LAeq noise contours can be seen to extend 4-5km from the end of the runway. If these contours were to be used at Manston, the majority of the town centre and a large proportion of listed buildings including the central harbour would be included.</p> <p>The Examiners’ second question leads to the simple but inevitable conclusion namely increasing neglect and deterioration as marketability of these assets becomes progressively more difficult.</p>

<p>HE.1.18</p>	<p>Listed Buildings RR-1095, RR-0881 and RR-0995 all raise concerns over possible impacts on the structure of listed buildings caused by vibration from passing cargo planes. Q: What impact do you consider that flights would have on listed buildings in terms of disturbance and vibration?</p>	<p>Applicants' Response: It is not considered likely that vibration would give rise to structural damage to any heritage assets. The Aviation Noise Metric does not consider structural damage arising through vibration, noting that vibration is extremely unlikely to give rise to even cosmetic damage. Vibration effects on structures are assessed in ES Chapter 12 Noise and Vibration, which concluded that structural effects are unlikely during operational of the airport and were therefore scoped out of the assessment (APP-034, 12.2.5). Construction effects are also assessed in ES Chapter 12 Noise and Vibration, which concludes that cosmetic damage to structures would not arise (APP-034, 12.7.30).</p>	<p>APP-034 Chapter 12 does not take into account turbulence. Report TR020002/APP/2.4 Appendix 2 notes that '<i>... Wake turbulence damage is usually verified by its pattern of damage. Only traditional slate or tiled roofs can be damaged and this damage is usually in the centre of the roof.</i>' Ramsgate has an abundance of slate roofs with dwellings around the East Cliff and near St. Laurence Church particularly vulnerable.</p> <p>There is some evidence from past use of the airport of damage caused by turbulence affecting roofs and chimney pots,</p>
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