

Manston Airport DCO: Comments on Historic England’s Written Representation to the Examining Authority on Historic Ramsgate DRAFT

Para	Content	Comments of The Ramsgate Society and RHDF
5.5.1	<p>Historic buildings beyond the development area may also have their heritage significance harmed by change to their settings, particularly by operational aircraft noise. Historic England agrees that the assessment of noise effects used by River Oak for the purposes of the ES was appropriate. The assessment had regard to appropriate guidance (The Aviation Noise Metric - Research on the Potential Noise Impacts on the Historic Environment by Proposals for Airport Expansion in England; and Good Practice Advice in Planning Note 3).</p>	<p>We raised in our written representation concern about the limitations of the ES assessment given :</p> <ul style="list-style-type: none"> • the adoption of a one kilometre wide zone around the site for analysis of ‘direct effects’ of aircraft noise and visual intrusion – thereby excluding the whole of Ramsgate and its 456 listed buildings and structures and four conservation areas; • the use of a largely untried and untested methodology for determining and assessing the ‘indirect effects’ of noise and visual intrusion – known as the ‘Temple metric’; and • questions about the appropriateness of this metric for ‘scoping out heritage assets for further assessment given the airport is and has been closed for 5 years. <p>It appears HE has without challenge accepted the applicants’ approach. From subsequent email exchanges with the author relating to it’s written statement¹, HE’s lack of any technical expertise in the area of aircraft noise modelling seems to explain the reason for its uncritical line.</p> <p>This is extremely troubling if correct and casts a shadow over the rest of its evidence.</p>
5.5.2	<p>Scoping for aviation noise impacts initially used a contour that mapped the frequency of maximum noise exceeding a 60dB threshold (N60) and then the sensitivity of the heritage significance of the asset to noise was assessed (see the ES 9.6.20-9.6.28). Assets which may be sensitive to noise for reasons other than heritage significance, such as residential properties, are assessed within the assessment of operational noise in Chapter 12 of the ES.</p>	<p>The metric applied relates to the expansion of existing airports in use and was developed especially to cover the assessment of indirect effects of aircraft noise in respect of Heathrow’s’ third runway proposal.</p> <p>The historic buildings of Ramsgate are treated as though they are exposed to existing aviation noise. That is not the case. Correctly applied, the metric would require a site-specific assessment of each historic asset and consideration of absolute noise impact, rather than noise and annoyance averaged out over 16 and 8 hour periods.</p>
5.5.3	<p>We broadly agree with the assessment of the effects of change in Table 9.15 of the ES. There will be some harm to some Listed Buildings as a result of increases in aircraft noise; in particular Cleve Court and Cleve Lodge, Way House and Wayborough House will suffer “significant effects” according to the ES, which we assume will be “less than</p>	<p>It is hard to see how HE reach this view given they lack technical expertise to challenge and test the applicants’ conclusions. Interestingly, not one of the listed buildings referred to lies within Ramsgate, despite the town’s proximity to the airport and line of the eastern flight path which cuts right across its extremity.</p>

	<p>substantial harm” in the terms of the ANPS. The harm should be reduced as far as possible but it seems possible that residual harm to these heritage assets will remain after mitigation.</p>	<p>In our opinion substantial harm will be caused to a majority of the 456 listed buildings and structures within Ramsgate, and to its four conservation areas, due to the intensity of aviation use. Moreover, given the conclusions reached by RSPs’ consultants’ on noise – see below – there will be a spiralling downward trend in terms of maintenance and improvement of assets as the market popularity of Ramsgate rapidly declines.</p> <p>Noise : <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>5.5.4</p>	<p>There are two Scheduled Monuments in close proximity to the proposed development: the enclosure and ring ditches sited 180m eastnortheast of Minster Laundry and the Anglo-Saxon cemetery south of Ozengell Grange. The Scheduled Monuments have national importance but we think that their importance derives principally from their evidential value (i.e. the archaeological potential of buried deposits within their boundary); we do not think that they gain much of their significance from characteristics of their settings (i.e. there is little in their settings that contributes to the understanding and appreciation of their heritage significance). Therefore, while there is a large magnitude of change within the setting of the scheduled monuments the setting contributes little to their heritage significance and heritage significance of the scheduled monuments is minor (less than substantial harm).</p>	
<p>5.5.5</p>	<p>We do not consider that the heritage significance of heritage assets in Ramsgate or any of the other conservation areas are likely to be much harmed by operational aircraft noise. We expect that any socio-economic effects on heritage assets caused by noise would be addressed by other parts of the ES.</p>	<p>This is a breath-taking conclusion drawn from a methodology neither understood by the author nor related to the reality of what is envisaged for the town of Ramsgate.</p> <p>The last sentence is incomprehensible: what socio-economic effects will be addressed by other parts of the ES?</p>

ⁱ Jason Jones- Hall formal complaint to Historic England March 2019