

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

Application Ref: TR020002

Additional Written Representations of the Historic Buildings and Monuments Commission for England (Historic England)

Registration ID No. 20014009

Our Ref: PA00513760

Dated: 08 March 2019

Following the submission of our Written Representations Historic England has received queries and challenges from some Interested Parties about our Written Representations to the ExA in relation to our views about the potential effect of operational aircraft noise on heritage assets in Ramsgate, including its Conservation Areas, and upon the projects that form the Heritage Action Zone programme.

We have looked carefully at our Written Representations and also our answers to the Examining Authority's questions in relation to this matter and think that we could have been clearer in our response. We therefore would like to take this opportunity to clarify and expand our previous advice.

Noise assessment methodologies

We understand that evidence has been presented that much of Ramsgate lies within the 80dB contour for some aircraft movements and that the magnitude of noise experienced in Ramsgate during such movements would be much greater than that conveyed by average noise measurements (such as LAeq) over a long period of time, such as 16 hours. We maintain our position that we have not the expertise to

make judgements about what noise assessment methodologies should be employed to measure the magnitude or other characteristics of noise change. We expect that those who are appropriately qualified to do so will advise the ExA about the appropriateness of the noise change assessment methods and the veracity of reports.

The Aviation Noise Metric Report

The Airports National Policy Statement (2018) requires the assessment of the effects of noise change on heritage assets to be based on the guidance provided in the Aviation Noise Metric report (“Aviation Noise Metric - Research on the Potential Noise Impacts on the Historic Environment by Proposals for Airport Expansion in England, Project No. 6865 Final Report” 2014). This report was commissioned by English Heritage to develop a methodology to analyse the noise impacts of airport expansion on the surrounding historic environment. It is broadly complementary to the Historic England document “The Setting of Heritage Assets”, which is our guidance for assessing the effect of all sorts of changes to the setting of heritage assets, not just noise. We think the Aviation Noise Metric is the appropriate guidance to follow in assessing the effect of noise change on the setting of heritage assets and hence on the ability to experience or appreciate their significance.

The Aviation Noise Metric recommends that designated assets are scoped-out during the first stage of desk-top assessment if they are outwith defined noise contours, or sifted out during the second stage of desk-top assessment if they are not considered potentially sensitive to the anticipated noise change. The remaining heritage assets, which are considered to be potentially sensitive to the anticipated

noise change, are then visited and assessed in detail. We note that it has been suggested that some heritage assets in Ramsgate and other places would be harmed by noise change and that this hasn't been properly assessed because some heritage assets were incorrectly scoped-out in the early stages of the assessment process.

We understand from the Environmental Statement (ES) that the N60 contour (i.e. the area in which noise change greater than 60dB would be experienced on 20 occasions each day) was used for initial scoping and sensitivity assessment (ES s.9.6.20 & s.9.6.21). The heritage assets that passed this stage were then visited and assessed in detail according to the method described in s.9.6.22 of the ES.

The approach taken within the ES appears to comply with the Aviation Noise Metric. However, we would also note that in so doing, some heritage assets would have been scoped-out, and these then would not have been considered in detail. This may then have given rise to concerns about which assets were scoped-out, and the reason for this. The ExA may wish to consider whether further information should be provided by the Applicant regarding its assessment. Should there be any further assessment and information provided then Historic England is of course ready to offer further comments to the ExA.

Socio-economic effects on heritage assets and Ramsgate Heritage Action Zone

In our Written Representations we set out that we expected that any socio-economic effects on heritage assets caused by noise would be addressed by other parts of the

ES. For the avoidance of doubt it was not our intention to downplay or ignore the potential effects of an airport on the land and communities which would surround it. Rather we considered that the socio-economic effects were not unique to the historic environment and would be better assessed by those with expertise in this area and the matter then determined by the Examining Authority.

With respect to the method of assessment of effects, we continue to think that socio-economic assessment should be carried out by specialists in that field. We would however note that if socio-economic evidence is presented indicating the potential for heritage assets to be affected by operational aircraft noise, and that this effect would be harmful to the heritage significance of those assets, then this would need further consideration by the ExA, if necessary with further input with Historic England.

In our Written Representations we stated that we do not consider that the heritage significance of heritage assets in Ramsgate are likely to be much harmed by operational aircraft noise (Para 5.5.4); however in our response to the Examining Authority questions we said that we do not consider that the heritage significance of heritage assets in Ramsgate are likely to be harmed. We would like to clarify that the wording of the Written Representations is correct – that there may be some harm caused.

We wish to explain that the Heritage Action Zone is not a heritage asset in its own right but is a partnership to deliver a programme of projects based in, and depending on, the historic environment of Ramsgate. The historic buildings, archaeological

remains and conservation areas that contribute heritage significance to the place are the potential heritage receptors of harm from aircraft noise, so it is the harm to their heritage significance that should be measured by heritage assessment. On reflection, our advice did not sufficiently reflect the potential effects of operational aircraft noise on heritage assets (for the reasons given above) and on the HAZ projects (which we address below). After due consideration we think that our response was too brief and did not sufficiently explain what we meant to say; we regret the concern that it caused.

To be clear, we think that the aims of the HAZ programme will remain unchanged but that operational aircraft noise could have socio-economic impacts and that if the heritage significance of heritage assets, or the potential for this to be appreciated by people, is harmed this might make HAZ projects more difficult to deliver. We did not mean to imply that re-opening the airport would not have consequences, including for the historic environment, but we did not see any such effects as exclusive to heritage assets and therefore thought that the socio-economic chapter of the ES was the place where the effect on Ramsgate as a place should be considered.

Finally, if, based on evidence provided by other parties or as a result of its own deliberation, the ExA has any outstanding questions of Historic England or concerns, we would be pleased to assist further in any way that we can.