

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

Application Ref: TR020002

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

Registration ID No. 20014009

Our Ref: PA00513760

Dated: 20 May 2019

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1 QUESTION HE.3.2 – NON-DESIGNATED HERITAGE ASSETS

1.1 The ExA asked the following question: “In answer to question HE.2.5, and in relation to the T2 Hangar and WWII Dispersal Bay, the Applicant states that the Historic England Listing Selection Guide for Military Structures (the Guide) notes that outside key sites identified in the Historic Military Aviation Sites Guidance, it is only groups (of buildings, fighter pens and defences) and individual examples of strong intrinsic or associational importance, which would be considered to be of national significance. Manston airport is not listed as a key site in the Guide. The Applicant considers that their potential loss could be mitigated by recording of the structures. Do you agree with the above opinion and interpretation of your Guide?”

1.2 Historic England’s listing selection guides help to define which historic buildings are likely to meet the relevant tests for national designation and be included on the National Heritage List for England. If a building is felt to meet the necessary standards, it is added to the List. This decision is taken by the Government’s Department for Digital, Culture, Media and Sport (DCMS).

1.3 The Listing Selection Guide for Military Structures guide outlines Historic England’s assessment of England’s military buildings and structures. It says that our thematic survey of historic airfields focused on the identification of those key sites which best reflect the development of military aviation from 1910 to 1945, those which are most strongly representative of functionally distinct airfield types and those with a strong relationship between built fabric and the flying field. The

guidance does not actually include a list of the outstanding survivals of permanent airfields considered suitable for listing; however we agree that Manston airport is not among the sites that were deemed the most historically significant key sites.

1.4 The Listing Selection Guide says that outside of these key sites, it is groups of buildings, fighter pens and defences, and individual examples of strong intrinsic or associational importance, particularly those with key historical episodes of the Second World War, which have been recommended for protection. Criteria for assessment of such features and groups include rarity; technical or structural interest; group value with related structures; and operational importance (such as direct involvement in an important campaign such as the Battle of Britain or the Battle of the Atlantic).

1.5 Historic England has taken the view that because inadequate survey of such buildings and features has been undertaken at Manston it has not been possible to determine whether the individual features or groups of features have strong individual or associational importance; however it is plausible that some of them will be found to have such importance following further survey and analysis. Therefore, we think that the applicant has been too dismissive of the potential importance of historic buildings.

1.6 We think the applicant is not justified in concluding that the potential loss of these buildings can be mitigated by recording. The Airports National Policy Statement (2018) (ANPS) says that the impact of development upon heritage assets should

be avoided or minimised (5.198), and that the Secretary of State will take into account the desirability of sustaining and, where appropriate, enhancing the significance of heritage assets; the contribution of their settings; and the positive contribution their conservation can make to supporting sustainable communities – including to their quality of life, their economic vitality, and to the public's enjoyment of these assets (5.199).

1.7 Furthermore, the ANPS also says that once lost, heritage assets cannot be replaced, and their loss has a cultural, environmental, economic and social impact, and given that heritage assets are irreplaceable, any harm or loss should require clear and convincing justification (5.201).

1.8 We think it is premature of the applicant to say that their loss can be adequately mitigated by recording of the structures. No clear and convincing justification has been offered, including demonstration that harm has been avoided as far as possible in order to conserve and enhance heritage significance, and little consideration appears to have been given to the contribution their conservation could make to the character of the place and public appreciation.