

Summary of Applicant's Case put Orally - Landscape, Design, Archeology and Heritage hearing and associated appendices

TR020002/D8/ISH4

**Examination Document** 

Project Name:

Manston Airport Development Consent Order

Application Ref: TR020002

Submission Deadline:

Date:

#### MANSTON AIRPORT DEVELOPMENT CONSENT ORDER APPLICATION

## APPLICANT'S WRITTEN SUMMARY OF ORAL SUBMISSIONS PUT AT ISSUE SPECIFIC HEARING 4 ON LANDSCAPE, DESIGN, ARCHAEOLOGY AND HERITAGE

#### 3 JUNE 2019

#### Laurence Suite, Building 500, Discovery Park, Sandwich, CT13 9FF

#### 1 Introduction

1.1 This document summarises the case put by RiverOak Strategic Partners (**the Applicant**), at Issue Specific Hearing 4. The hearing opened at 2pm on 3 June 2019 at Laurence Suite, Building 500, Discovery Park, Sandwich, CT13 9FF. The agenda for the hearing was set out in the Examining Authority's (ExA) letter published on the Planning Inspectorate's website on 24 May 2019 [EV-019].

### 2 Agenda Item 4: Landscape and Visual Impact

#### (a) Relationship between landscape assessment and policies in the emerging Thanet Local Plan

- 2.1 The ExA asked about where bunding had been assessed in the ES and secured in the dDCO. A note on this issue is provided as Appendix ISH4-1 to this document. Bunding is authorised by item (g) at the end of Schedule 1 to the dDCO, and secured through the landscaping scheme that must be approved under Requirement 10.
- 2.2 The Applicant highlighted that a preliminary review of emerging Policy SP23 Landscape Character Areas identified that the proposed development may *potentially* affect four of the six criteria identified by TDC as contributing to Thanet's local distinctiveness (criteria 2, 4, 5 and 6). A more detailed review considers these four criteria as follows:

**Criterion 2:** The sense of openness would be maintained across the southern part of the site through the retention of the existing runway. Across the central section of the site, the sense of openness would be subject to an incremental change with additional buildings adding to the existing built form within this area. The sense of openness within the northern part of the site (northern grass area) would be reduced with the proposed built form and boundary planting contributing to a character which is more akin to that of the neighbouring villages of Manston to the east and Woodchurch to the west with the enclosure provided within these settlements noted as a key characteristic of Local Character Area A1: Manston Chalk Plateau.

**Criterion 4:** The site is not designated as a Green Wedge in the emerging Thanet Local Plan. The proposed development would play an incremental role to the long-standing built form and land use within the site.

**Criterion 5:** Field surveys undertaken in respect of the LVIA indicated that long distance open views towards the Coast and low-lying landscape to the south are primarily available from the edge of the chalk plateau to the south of the site looking south/southeast or from areas to the north of the site looking north/northeast. The proposed development would not interrupt these views as demonstrated by the visual assessment (Section 11.9 of the ES [APP-034]) and viewpoint assessment (Appendix 11.3 of the ES [APP-057]).

- **Criterion 6:** The skyline created by the chalk plateau from the lower lying landscapes within Thanet and Dover District to the south of the site is recognised as part of the landscape character sensitivity assessments and an assessment made of the effects of the development upon this skyline in Section 11.8 of the ES [APP-034].
- 2.3 With regard to the requirements of the emerging policy SP23 for development proposals to "demonstrate how their location, scale, design and materials will conserve and enhance Thanet's local distinctiveness", this information is set out in the Design Guide [REP4-024]. This document, together with the landscape assessment presented in Section 11.8 of the ES [APP-034] demonstrates that landscape impacts have been minimised and mitigated as far as possible, as required in the final paragraph of draft Policy SP23.
- 2.4 The Applicant confirmed that the importance of the Ridgeline is recognised, and the ridgeline was assessed as part of the assessments for other landscape character areas, e.g. E1 Stour Marshes (TDC) and Ash Levels (DDC). The ridgeline is referenced in the Landscape Sensitivity Assessments and in the ES.
- 2.5 For clarity, the Applicant has prepared a technical note which has been submitted as Appendix ISH4-2 to this document.

#### (b) Impacts of lighting

- 2.6 The Applicant re-iterated that it is not technically possible to produce night-time wirelines to illustrate the effect of lighting and hence there are no visualisations of the Proposed Development at night. A wireline will only represent the form and location of the structure in question, but not the surface texture, colour, nor the appearance and/or effect of any associated lighting from structures.
- 2.7 Night-time visualisations would not add any value at all to the assessment, which the Applicant considers to be robust, even in their absence.
- 2.8 The Applicant highlighted that the LVIA Addendum, submitted as Appendix LV.1.36 at Deadline 3 [REP3-187] provides both an assessment of the effects on night-time views and a Lighting Strategy, presented in Appendix 1 to this document. This describes a lighting strategy that can achieve compliance with the thresholds defined for the relevant Environmental Zone (E2); Rural.

Table 1.1 Environmental Zones and corresponding areas within Thanet - Landscape and Visual Impact Assessment Addendum.

Zone	Surrounding	Lighting Environment	ILP examples	Corresponding areas in Thanet
EO	Protected	Dark	UNESCO starlight reserves, IDA dark sky parks	None
E1	Natural	Intrinsically dark	National Parks, Areas of Outstanding Natural Beauty etc	Landscape Character Areas associated with Pegwell Bay and former Wantsum Channel, and European Marine Sites
E2	Rural	Low district brightness	Village or relatively dark outer suburban locations	Rural areas outside of the built confines Includes Green Wedges

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E3	Suburban	Medium district brightness	Small town centres or suburban locations	Urban areas and villages
E4	Urban	High district brightness	Town/city centres with high levels of night time activity	Amusement Arcades at Margate Seafront

- 2.9 The Applicant highlighted that Photographs of night time views have been provided and are included in the ES as Figures 11.22a and 11.29 in [APP-041].
- 2.10 Regarding a night time visualisation of, and the resulting 'glow' from the Proposed Development, The Applicant suggested that a visualisation could be produced, however, could not be relied upon to be accurate.
- 2.11 The Applicant confirmed that Requirement 4 of Schedule 2 of the Development Consent Order secures that details of lighting must be prepared by them and approved by the local planning authority.
- 2.12 Regarding Viewpoint 1 and visual receptor sensitivity, the Applicant clarified the reasons for the assessment, as follows: visual receptor groups at or close to this viewpoint during the day-time are recreational receptors visiting the museum. The visual receptor sensitivity was therefore assessed as Medium during daylight hours.
- 2.13 Reference to the website for the RAF Manston History Museum and the Spitfire and Hurricane Memorial Museum indicates that the museums close at 16:00 throughout the year. Consequently, visual receptors at Viewpoint 1 during the hours of darkness are likely to be people at their place of work.
- 2.14 The Applicant highlighted that paragraph 6.34 of GLVIA3 notes that visual receptors which are likely to be less susceptible to change include "people at their place of work, whose attention may be focussed on their work or activity, not on their surroundings". They are also likely to place limited value on the views available. As such, the Applicant deemed it appropriate to assess the visual sensitivity of receptor groups at or close to this viewpoint during the night-time as low.
- 2.15 An additional lighting assessment was submitted as part of the LVIA Addendum, submitted as Appendix LV.1.36 to the Applicants Responses to the First Written Questions [REP3-187], which provides an assessment of visual effects on night-time views. This concluded that there would be no significant effects on night-time views.
- 2.16 Regarding Viewpoint 2, the Applicant emphasised that there is no reliance upon residents to provide their own mitigation in the form of drawing their curtains. The assessment makes the assumption that during night time hours, residents are more likely to be indoors with their curtains drawn. They will not be looking out of their windows focussing on a view of the airport.
- 2.17 Finally, the Applicant and TDC have agreed to addition of a new item xiv) to Requirement 7(2)(b), which would read:
  - 'xiv) a Lighting Strategy to meet the requirements set out in the Draft Lighting Strategy'.
- 2.18 The lighting strategy that has already been submitted to the Examination would then be a certified document and included in Schedule 10 as the 'Draft Lighting Strategy'

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#### (c) The drawing up, implementation and phasing of landscaping plans

- 2.19 The Applicant confirmed that the assessment had been carried out on the assumption that the western and eastern perimeter planting around the business park would be undertaken in Year 1, while planting east of Spitfire Way/south of Manston Road would be implemented by Year 10.
- 2.20 It is acknowledged by the Applicant that the planting referred to above could be brought forward in the programme to ensure earlier establishment of the proposed mitigation. The Applicant therefore agrees that this planting will be implemented during Phase 2 of the Proposed Development, once the necessary demolition works have taken place.

#### (d) Impacts of the proposed Manston-Haine Link Road on landscaping

- 2.21 As noted in several of the Issue Specific Hearings, the Manston-Haine Link is a scheme being promoted by KCC and is not part of the DCO nor is it required to deliver the airport project. Notwithstanding this, the Applicant has agreed to safeguard an area of land in the North East corner of the Northern Grass area in order that KCC can connect with the existing Manston Road, should they at some point be able to bring forward the Inner Circuit part of the Thanet Transport Strategy.
- 2.22 In terms of the landscaping planned as part of the DCO project, this will be implemented in full and as such any impacts associated with the DCO will be fully mitigated in accordance with the impact assessment presented in the ES. Should the KCC scheme come forward this will need to be assessed in its own right however it appears that there would be sufficient space for the road as well as a landscape mitigation scheme within the safeguarded area.

#### (e) Clarification on the felling or lopping of trees and the removal of hedgerows

- 2.23 The Applicant explained that the removal of trees and/or shrubs is focussed on a small number of specific areas within the site. None of the trees to be removed are subject to tree preservation orders and it is confirmed that moving or grubbing out hedgerows will be carried out in accordance with the 1987 Hedgerow Regulations. The areas in question are as follows:
  - An area of occasional trees and/or shrubs which lie to the northeast, east and southeast of the existing aircraft maintenance building; and
  - A small group of small trees and/or shrubs sited within the site to the west of Manston Court Road and north of Manston Road (B2050), to the southwest of the existing fuel farm.
- 2.24 The Applicant highlighted that hedgerows along the northern boundary at the western end of the site, and along an internal access road to the south of this, were not illustrated on the Landscape Strategy Plans, but will be retained. The Landscape Strategy Plans have been updated to indicate this and are submitted as Appendix 1 to this document.
- 2.25 The Applicant further highlighted that the southern hedgerow may need to be reduced in length, as the eastern end of it lies within the glide path from a western approach and an assessment of the hedgerows height needs to be undertaken in relation to this. Surveys of this feature will be carried out prior to commencement of construction, once access to the site is available. The Landscape Masterplan will need to take into account any 'features of interest' or ecological value in the final version of the masterplan. The final masterplan as

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- well as any consequential landscape considerations is secured via Requirements 3, 4, and 10 in the dDCO and will require sign off from the relevant authorities.
- 2.26 The Applicant emphasised that all other existing trees, shrubs and hedgerows would be retained. It is important to note that existing planting along the boundary (east, north and west) of the Northern Grass Area, adjacent to sensitive visual receptors, would be retained with additional planting along these boundaries proposed.

#### 3 Agenda Item 5: Design

3.1 The Applicant gave a presentation on the approach to the design of the airport and answered questions from the ExA. The slides used in the presentation are appended as Appendix 2 to this document.

#### 4 Agenda Item 6: Archaeology

- 4.1 The Applicant has undertaken extensive consultation with Historic England and Kent County Council (KCC) regarding the wording and content of the requirements relating to undiscovered archaeological remains. Requirements 3 and 16 of the draft Development Consent Order (DCO) have been drafted with specific regard to the stated concerns of those bodies and are more than adequate to ensure the protection of any such remains that may be found on site.
- 4.2 The Written Scheme of Investigation (WSI) is secured by dDCO Requirement 16. It sets out the standards and scope of archaeological works required for further investigation alongside mitigation via investigation and recording of archaeological remains.
- 4.3 The draft WSI makes explicit reference to dDCO Requirement 3; provision, is made for particularly significant remains to be protected by avoidance or engineering solutions. This provision places the ultimate decision over the acceptability of loss or provisions for preservation with the Secretary of State, in consultation with Historic England and KCC.
- 4.4 The WSI sets out that archaeological material which is normally subject to statutory protection under the *Protection of Military Remains Act 1986*, the *Treasure Act 1996* and the *Burial Act 1857* would remain subject to statutory protection.
- 4.5 The requirements ensure a high level of protection such that both the masterplanning process and the construction of the development must have regard to the heritage significance of any assets found during pre-construction site investigation. The Requirements robustly address the risk of potential harm and operational requirements through enforceable provisions for protection of particularly significant remains and mitigation of any potential loss.

#### 5 Agenda Item 7: Heritage Policy

5.1 The Applicant noted that the assessment presented in Chapter 9 of the Environmental Statement (ES) [APP-033] presents a worst-case assessment of potential harm to designated heritage assets and considers all design mitigation measures that could practicably be applied.

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- 5.2 The Applicant highlighted that paragraph 5.200 of the Airports National Policy Statement (ANPS) stipulates that great weight should be given to harm to significance of designated heritage assets. The Applicant also notes that ANPS 5.205 and 5.203 recognise that harm to heritage assets must be weighted proportionately to the significance of designated heritage assets and the magnitude of harm that would arise.
- 5.3 The specific nature of harm and the significance of heritage assets must be better understood in order to support any balancing exercise. It is important to note that all predicted harms to designated heritage assets as a result of the project are of less than substantial magnitude and would arise through change to their setting rather than direct structural change.
- 5.4 Within the category of less than substantial harm, it is appropriate to consider greater and lesser harms to assets, i.e. a judgment must be made as to the scale of harm within the less than substantial category.
- There is a common-sense distinction between very minor effects, which would arise through change to setting alone, and greater effects which may still fall short of substantial harm such as those which could result from inappropriate alteration. These distinctions are reflected in the effect criteria set out Chapter 9 of the ES at Table 9.13 [APP-033].
- 5.6 Appendix HE 1.2 [REP3-187] sets out a list of 15 designated heritage assets that would be affected by the project. Of these, four would be affected to a negligible magnitude, nine to a low magnitude and two to a medium magnitude.
- 5.7 None of the heritage assets of the highest significance are affected to more than a low magnitude of adverse change.
- 5.8 A negligible magnitude of change is defined in the ES at Table 9.13 [APP-033] as 'Minor and short term or reversible change to setting which does not affect the significance of the asset', a low magnitude of change is defined in the ES at Table 9.13 as 'Minor and short-term changes to setting which do not affect the key characteristics and in which the historical context remains substantially intact' and a medium magnitude of change is defined as 'Change to the key characteristics of an asset's setting, which gives rise to harm to the significance of the asset but which still allows its archaeological, architectural or historic interest to be appreciated.'
- 5.9 It is important to note that any harm must be weighed in proportion to the public benefits of the scheme which were described in Appendix HE 1.2 in the Applicant's answers to first written questions [REP3-187].

#### 6 Agenda Item 8: Heritage - Noise

#### (a) The use of the aviation noise metric study

- 6.1 The Applicant confirmed that the assessment of change to setting arising from aviation noise was carried out in accordance with the Historic England Aviation Noise Metric (ANM) [REP6-014], which sets out a three-stage process, as follows:
  - Define a study area with reference to N60 contours (ANM 5.2);
  - Identify sensitive heritage assets with reference to 4 categories defined by where specific noise environments contribute to significance (ANM 5.3); and

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Assess change with reference to LAEQ(T) (ANM 5.4).

The application of this method is set out in ES [APP-033] and in ES Appendix 9.1 [APP-052].

- (b) Potential effects of noise upon heritage assets, including upon the setting of listed buildings and the character of conservation areas
- 6.2 The Applicant gave the example of Ramsgate Conservation Area, a busy urban centre, characterised by a discernibly modern soundscape that does not contribute to significance, and is therefore not classified as sensitive by ANM. This is consistent with the ANM worked example of Windsor Conservation Area (ANM 6.7). Ramsgate however, does contain a number of potentially sensitive heritage assets, primarily places of worship. Where these fall within the 54dB LAEQ16 contour, which is effectively the lowest level at which ANM suggests noise could become intrusive to setting, these are located within discernibly modern urban areas where the noise environment reflects that context.
- 6.3 The Applicant highlighted that it is important to note that the ANM does not consider noise as an absolute quantitative measurement, but requires an understanding of how aviation noise would interact with the historic interests of asset(s). It is therefore not possible to equate a specific level of noise with a generalised magnitude of change.
  - The Church of St Lawrence
- 6.4 The Church of St Lawrence is positioned immediately adjacent to a busy junction, petrol station and railway station/sidings, which provide discernibly modern elements to the existing noise environment. The Applicant acknowledged that the parts of churchyard to the rear of the church is a quieter location, however, viewers will approach this area from the main roads and have an awareness of the urban context. Any sense of tranquillity would be relative to the street outside and would not be affected by aviation noise at the levels predicted.
  - The Church of St George
- 6.5 The ExA noted that the Chapter 9 of the ES [APP-033] scoped out the Church of St George from further consideration on the basis that it was outside the 54dB LAEQ16 contour, while noting that ES Figure 9.6 sheet 8 [APP-040] showed it as partially within the contour. The Applicant has reviewed this assessment accordingly via a post-hearing note submitted as Appendix ISH4-7 to this document (in response to the ExA's action point 7). This concluded that the assessment provided in the Environmental Statement remains appropriate.
  - Albion Place Gardens
- The ExA noted that the Chapter 9 of the ES [APP-033] scoped out Albion Place Gardens, while noting that ES Figure 9.6 [APP-040] showed it as partially within the 57dB LAEQ16 contour. The Applicant has reviewed this assessment accordingly via a post-hearing note submitted as Appendix ISH4-7 to this document (in response to the ExA's action point 7). This concluded that the assessment provided in the Environmental Statement remains appropriate.

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#### Additional Listed Buildings

6.7 Historic England published revisions to the National Heritage List for England (NHLE) resulting in the designation of nine new Grade II listed Buildings and the upgrading of the Grade II East Court to Grade II\*. The Applicant, as requested by the ExA (at action point 5), has assessed these heritage assets in line with the ANM in a post-hearing note submitted as Appendix ISH4-5 to this document. Of these heritage assets, none that meet the criteria for sensitivity to aviation noise are located within the 54dB LAEQ contour and it was concluded that no harm to the setting of these assets would arise.

#### (c) Effects on the Heritage Action Zone

- The Applicant explained that the Heritage Action Zone (HAZ) aims to promote economic regeneration through heritage. The Applicant noted that the project will bring additional tourists to Ramsgate. This provides opportunities for local authorities and tourist boards for tourists starting their journeys in this part of Kent. If successful marketed, there is no reason why those tourists would not be attracted by Ramsgate's heritage. This, in itself, is a benefit to the regeneration aims of the HAZ.
- 6.9 The Applicant highlighted that the wider HAZ is within a discernibly modern urban context, in which perceptibility of aircraft as well as numerous other noise sources (such as cars and buses) are an established presence. This defines the noise characteristics of the HAZ and will continue to do so regardless of the presence or absence of the project.

#### 7 Agenda Item 9: Landscape and Heritage – Visual Effects

- 7.1 The Applicant explained that visibility is transient by the nature of aviation movements. Aircraft that would pass overhead would not be a lasting element of views of, or from, heritage assets. This transience would remain with the predicted frequency of aircraft movements [HE2.4, REP6-012] and [HE3.1, REP7a-003]. The Applicant further asserted that visibility of aircraft would not be incongruous to a distinctively modern built environment and would be consistent with past use of Manston for aviation.
- 7.2 The Applicant noted that aircraft visible in longer views from open countryside or from more sparsely developed areas, such as St Nicholas at Wade, would be seen in context as small and distant elements in the view and would not interact with heritage interests in a way that would give rise to harm.
- 7.3 The Applicant further noted that aircraft visible in closer views, particularly in urban areas, would be seen fleetingly if at all, with views constrained by intervening structures and planting. The Applicant stated that these views do not affect the general architectural composition that is the key contributor to significance, nor the historical associations held by these buildings/areas.
- 7.4 The Applicant explained that aircraft lighting is not anticipated to give rise to any significant visual effects. The Applicant is not aware of any evidence that has been presented that suggests aircraft lighting is a matter for detailed consideration at other airport or that it would result in likely significant effects at Manston. The Applicant further highlighted that GLVIA does not require or set out any methodology for this type of assessment and confirmed that it had not been the subject of any consultee requests [LV.1.36 REP3-187].

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7.5 The ExA further noted that the response to Written Question LV.1.36 appears not to consider the hours of 06.00 to 07.00 as 'night'; the Applicant has provided further comment in a submission as Appendix ISH4-6 to this document.

#### 8 Agenda Item: 10. Heritage – Non-Designated Assets

- 8.1 Historic England identified four structures which it suggests may yet be demonstrated to be of designatable quality where more detailed survey is undertaken. These are:
  - WWII ATC tower;
  - WWII Battle HQ;
  - T2 Hangar; and
  - WW2 dispersal bay.
- 8.2 The Applicant confirmed that the WWII ATC Tower and Battle HQ would be safeguarded within the Museums area. Hence these assets would not be directly affected by the Proposed Development [HE2.1, REP3-187].
- 8.3 The Applicant explained that the WWII T2 Hangar represents a much-altered example of a standardised pre-fabricated type with both, the cladding and doors having been replaced. The Applicant highlighted that there are numerous better-preserved examples of T2 hangars, both individually and as groups within the UK. The Applicant has not been able to identify any designated T2 hangars identified within the National Heritage List of England. Designation has focused on earlier examples that are more evocative of architectural responses to changing aviation technology, or relate to specific technological developments in aviation, such as the Bellman Hangar at Brooklands. Although the WWII T2 hangar holds generalised associations with military use of the site, it is unlikely to hold the demonstrable direct associations that would afford the level of value required for designation.
- 8.4 The Applicant explained that the Historic England designation guidance is clear that designation of isolated and much-degraded survivals of standardised designs would not be appropriate in this instance. The WWII Dispersal Pen is the sole survivor of a group of at least three in this part of the airfield, with at least one other pen, also no longer extant, at the eastern side of the airfield. The Applicant confirmed that dispersal bays have been scheduled at other airfields, such as Catterick and Coltishall, but only where coherent groups of dispersals and/or other related features survive. Although the feature holds generalised associations with military use of the site, it is unlikely to hold the demonstrable direct associations that would afford the level of value required for designation.
- 8.5 The Applicant explained that the setting of these assets is defined by the piecemeal alterations arising from the gradual transition of the airfield from a military grass-strip to a modern civilian airport. Retention of the airfield in active aviation use would retain and reinforce the associative links with past aviation use. The buildings that would be retained would remain in a clearly historic area of the site where some of the core military structures survive and other WWII buildings are already in use for museums activity. Direct physical links with the modern Spitfire and Hurricane Museum and the Memorial Garden would further reinforce these associative links, allowing the historic interest of these assets to be more fully realised. While loss of intervisibility between the runway and the ATC tower would be an adverse change, this would be outweighed by the positive aspects set out above and would not be a significant adverse effect.

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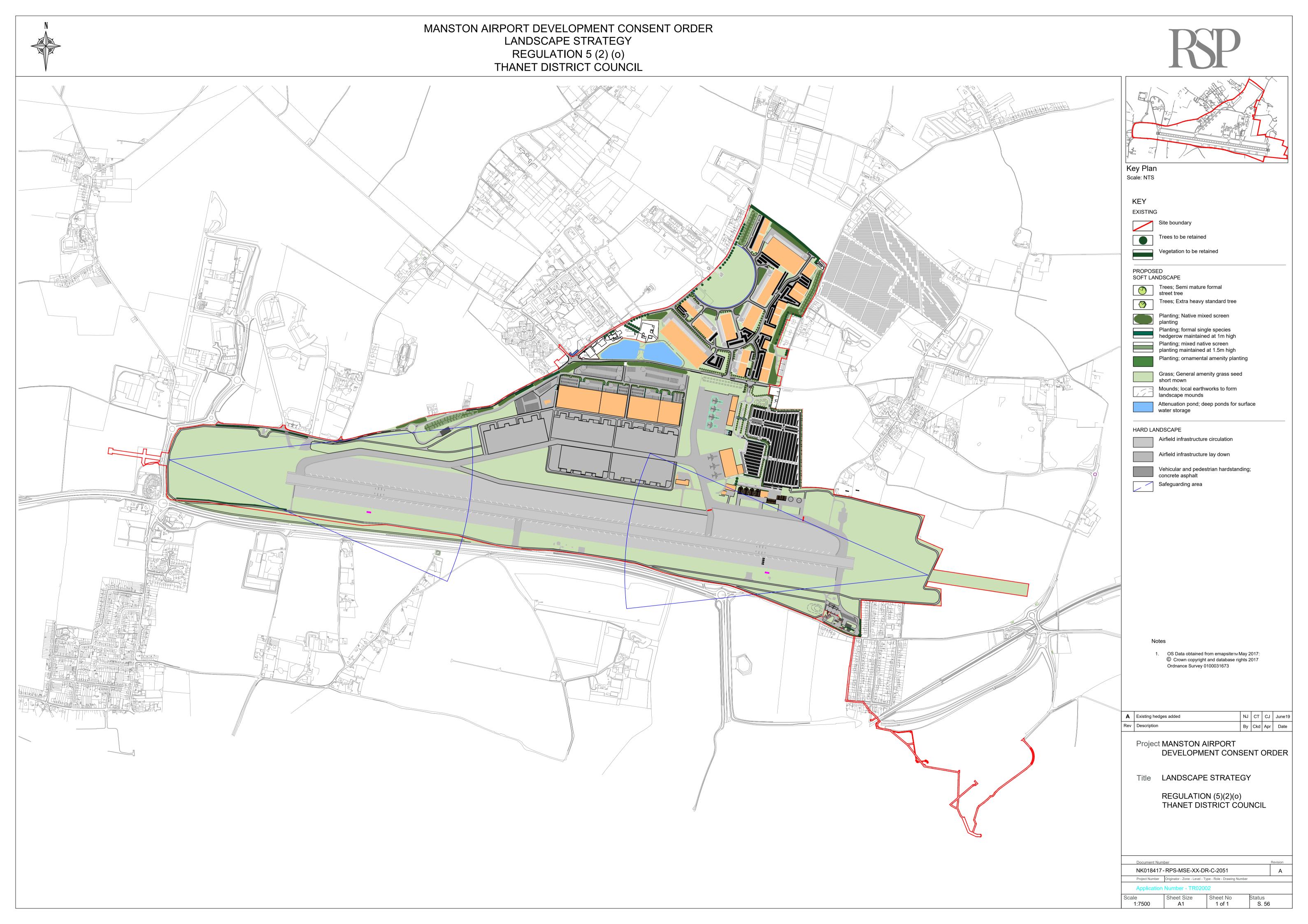
- 8.6 The Applicant's further comments on significance and retention or loss of structures are set out at Appendix HE.1.2 to ExA's FWQs [REP3-187].
- 8.7 The Applicant notes that any loss of historic structures would be mitigated by buildings recording set out in the WSI.

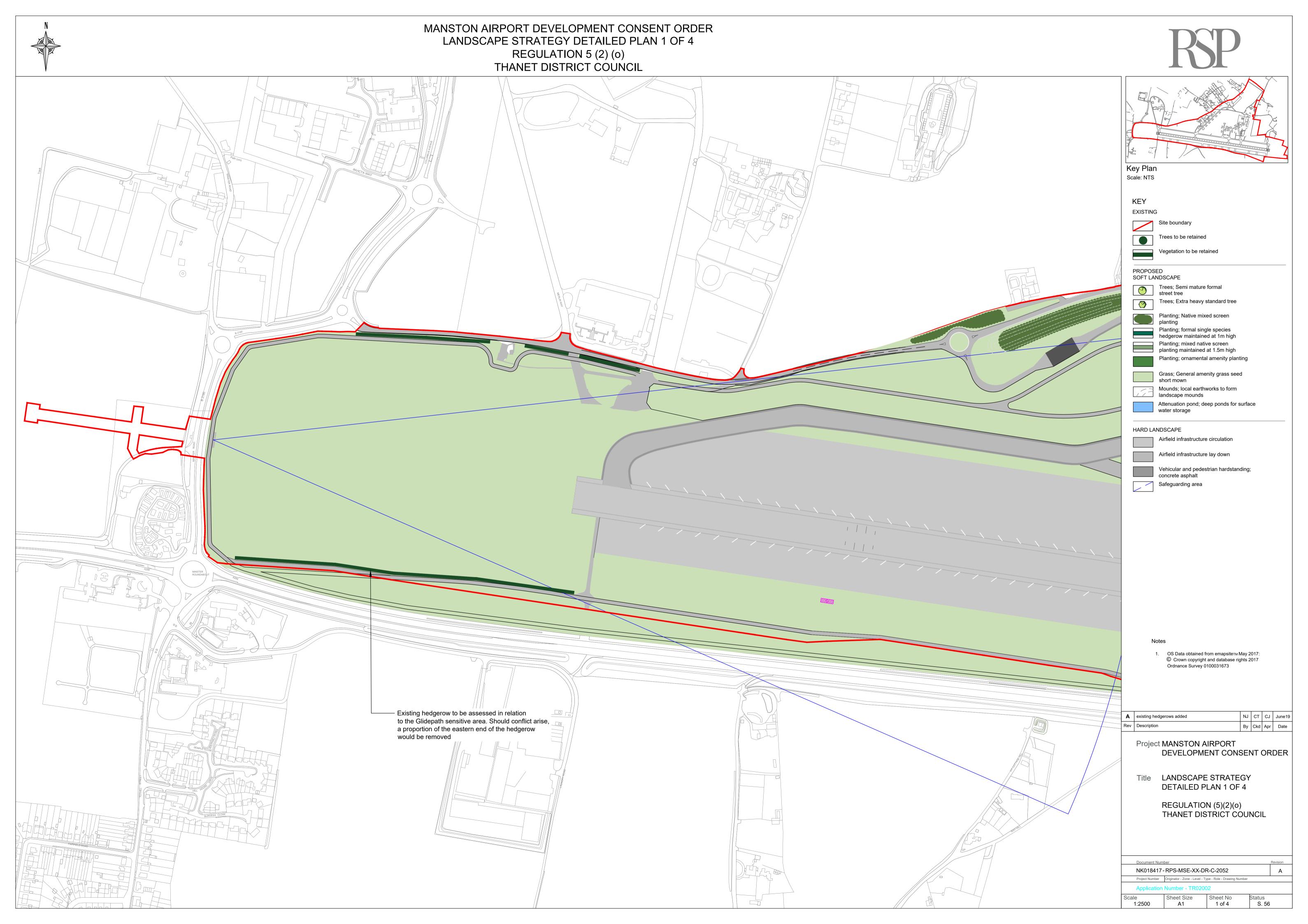
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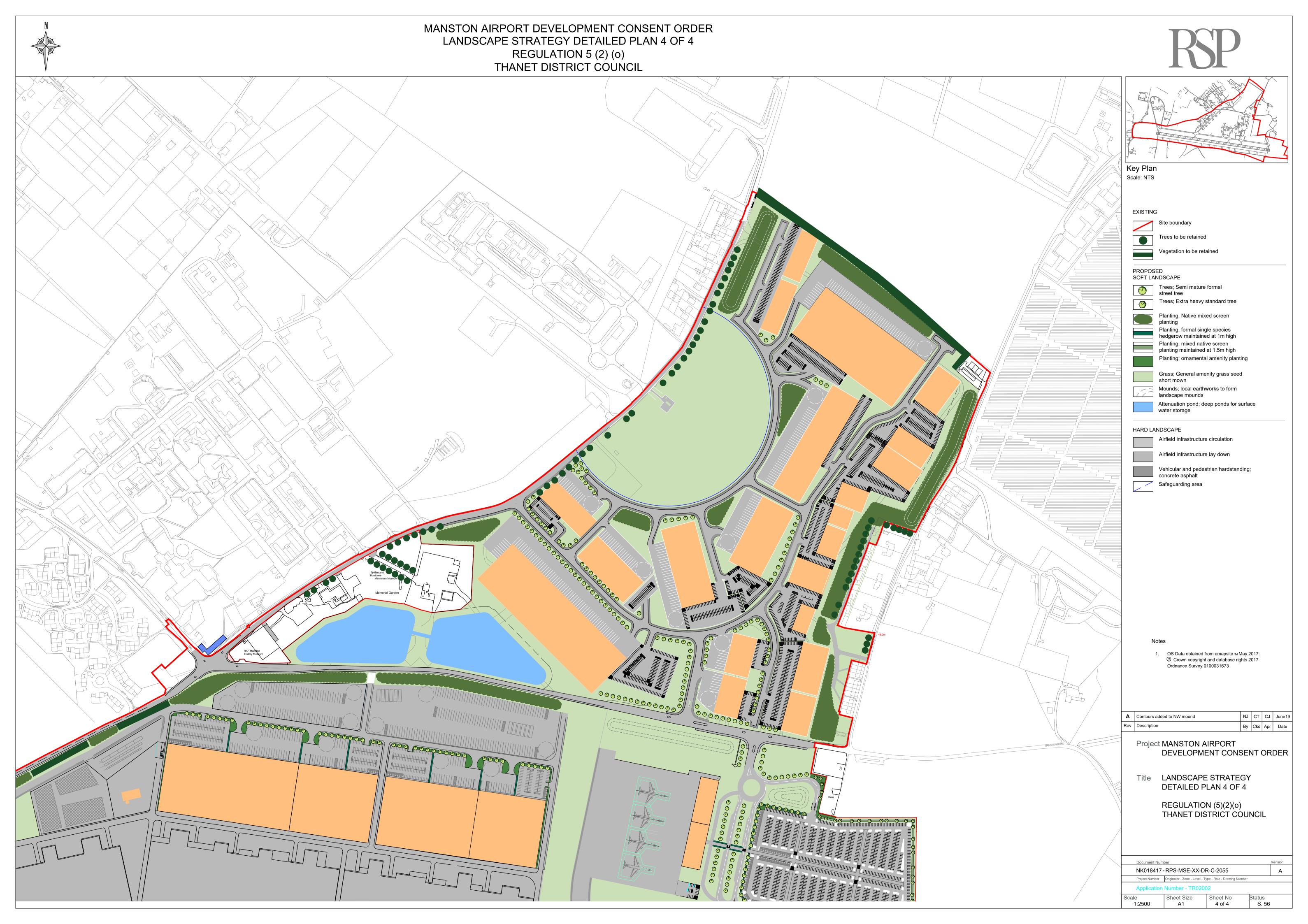
### ISH4 Appendix Index

ExA Action No.	Appendix No.	Document	
N/A	1	Landscape strategy plans	
N/A	2	Manston Design Presentation slides	
1	ISH4 – 1	Clarification in relation to the location and extent of bunding including where this has been assessed in the Environmental Statement (ES) and where it is secured in the draft Development Consent Order (dDCO).	
2	ISH4 – 2	Technical note assessing the robustness of the landscape assessment and the mitigations proposed against Policy SP3 in the emerging Thanet Local Plan.	
5	ISH4 – 5	Technical note concerning the effect of the Proposed Development on the May 2019 listing, upgrading and relisting of specific heritage assets in Ramsgate.	
6	ISH4 – 6	Note explaining why paragraph 3.1.2 of Appendices to Answers to First Written Questions: 15th February 2019 Appendix LV.1.36 cites the hours of winter darkness in which aircraft may be flying at 07.00 – 08.00 rather than 06.00 – 08.00.	
7	ISH4 - 7	Evaluation of the effect of the 54dB contour on Albion Place Gardens and Church of St George, and the proximity of the 57dB contour and likely flightpath on Albion Place Gardens.	

## Appendix 1









## Appendix 2





# Manston Airport Design Presentation

June 2019

RPS Group Riveroak Strategic Partners

Development Consent Order Examination Stage



## 0.0 | Welcome



#### **RPS Presentation Team:**



Geoff Dewick
Director of Aviation
BSc (Hons)
(CEng, MICE, MIAT)



Chris Johnson
Principal Engineer
BEng (Hons)
(IEng, MICE)



Jordie Bokor Senior Architect BArch (Hons), MArch, PGCert (ARB, RIBA)

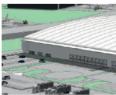
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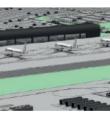
- 0. Welcome
- 1. Approach
- 2. Context
- 3. Identity
- 4. Materials & Colour
- 5. Materials & Landscaping
- 6. Sustainability
- 7. Summary

#### **Brief:**

A response to the Examiner's Question LV 2.1.

The design approach and design principles for the proposed Manston Airport scheme.





## **Design Benefits**

- · Reflecting the historical context of Manston Airfield.
- Encourage sustainability through Design Guide commitment
- · Consistent palette of high quality materials that relate to Manston and unify the site
- · Inclusivity for pedestrians and vehicles
- · Enhanced landscaping solutions
- Improved safety and security.
  - Bringing Manston back to life as an operational Airport.











## 1.0 | Approach

## **Introduction to Design Principle Main Groups**

- A. Respect for Context with reference to Historic England Guidance
- Character and Identity to address NPS 2018, Para 4.29-35
- Materials & Landscape to address NPS 2018, Para 4.29-35
- Sustainability to address NPS 2018, Para 4.30

### **Approach**

Design Guide Created



Submitted at Deadline 4 to supplement the Design and Access statement

The Design Guide establishes key principles to address the design of Manston Airport











## 1.0 | Approach

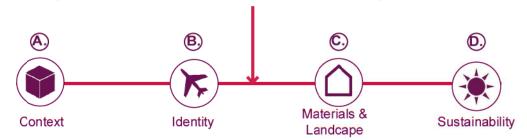
### Introduction to Design Principle Main Groups

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### **Approach**



The Design Guide establishes key principles to address the design of Manston Airport













## 1.0 | Approach

### Introduction to Design Principle Main Groups

- Respect for Context with reference to Historic England Guidance
- Character and Identity to address NPS 2018, Para 4.29-35
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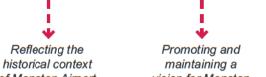
#### **Approach**



The Design Guide establishes key principles to address the design of Manston Airport



These Design Principles are committed to in the DCO ensuring the development is:



of Manston Airport vision for Manston as well as being Airport with a sensitive to the strong sense of surrounding area. place and distinct built environment

Defining a palette of high quality materials and landscaping that relate to Manston and its history and

unify the airport

Creating a set of sustainable design principles in both construction and design of the built environment









## 2.0 | Context

See: Design Guide Section 2



## **Retaining Historic Character**

As committed in the Design Guide:

- · Retention of historically valuable assets including:
  - The ROC Monitoring Post
  - The RAF Battle HQ
- · Safeguarding:
  - The Museums and Memorial garden.
- Enhancement of the existing runway.

## **Protecting Sense of Place:**

· Referencing Manston's WWI and WWII past Opportunities to tell the Manston story can be incorporated into street furniture, building motifs and public space

## **Example Design Principles:**

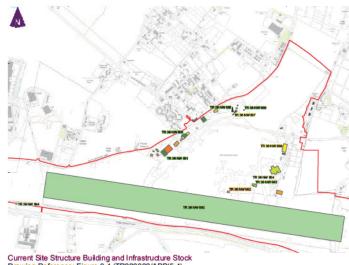
### Retention Principle A-07:

The redeveloped Manston Airport will have similar aviation uses to what has historically been on the site but will provide a broader, more viable and sustainable range of development...

#### Retention Principle A-08:

The Manston Airport redevelopment should endeavour, where practicable and economic, to maintain historically valuable assets on site....





Current Site Structure Building and Infrastructure Stock Drawing Reference: Figure 9.4 (TR020002/APP/5.4)

**Existing Museums** 





Wayfinding Examples

















## 3.0 | Identity

See: Design Guide Section 3



## RSP

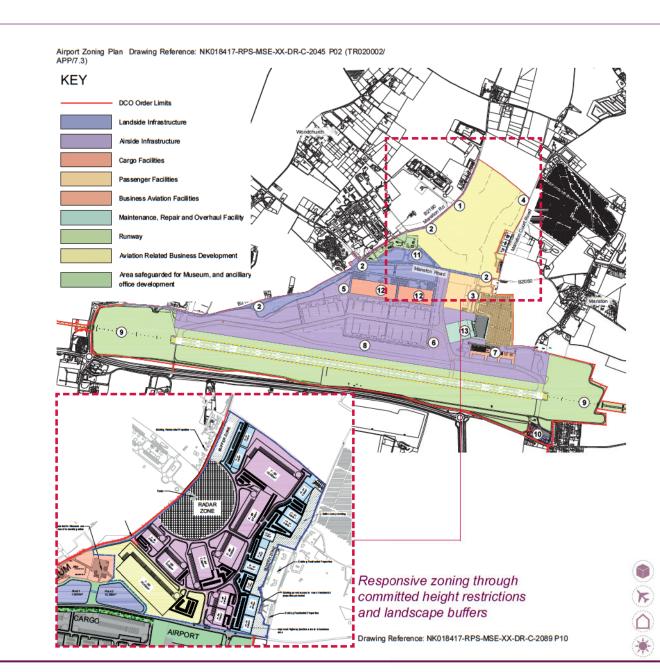
## The Masterplan

- · Retaining historical significance
- · Enhancing the operational facilities and infrastructure
- · Visually coherent and coordinated development
- · Landscaping to mitigate visual impact
- · A sustainable design: Reduce, Reuse, Recycle
- Zoning which responds to local context through building height restrictions and buffer zones
- · Coherent design identity across zones

## **Example Design Principles:**

Building Height (Identity) Principle B-35:

The masterplan design incorporates the use of mixed heights and levels along with landscape buffers to minimise impact on the surrounding environment...





## 3.1 Ildentity

See: Design Guide Section 4



## RSP

## **Examples**

## **Building Form**

- Simple articulated building forms and roof profiles reduce visual impact
- Contemporary lightweight materials with an industrial aesthetic
- Influence from vernacular aviation building forms to inspire new modern cargo buildings
- Using daylight to the optimum to create bright and airy spaces
- Technical specifications (ASIAD) to ensure mandatory safety requirements are achieved

## **Example Design Principles:**

### [Identity] Cargo Facilities Principle B-46:

Adding character and interest in the office portions through glazing, colour and interesting facade treatments.

## [Identity] Cargo Facility Principle B-47:

Breaking up the large mass of cargo facilities using curved roof profiles and a variety of cladding elevational treatments in order to reduce the landscape visual impact of the buildings.























## **4.0 | Materials and Colour** See: Design Guide Section 5



### **Materials**

· Consistency through an agreed palette of materials

#### Colour

- · Accent colour to articulate and energise forming focal points within the site
- · Neutral tones sensitive to existing buildings which do not adversely affect the landscape character

The intelligent use of light and colour helps improve the airport experience and helps build a distinctive sense of place.

### **Pedestrians and Vehicles**

- · High quality materials selected for their location and purpose - sympathetic to the environment.
- Appropriate use of material and colour to create recognizable routes and enhance the character of the site
- · Integration of cycling provisions and facilities throughout the site
- · An inclusive accessible network for pedestrians and vehicles

## **Examples**























## **5.01Materials and Landscape** See: Design Guide Section 6

## Design

- Existing vegetation retained and reinforced to provide a mature landscape setting
- · Specimen tree planting at key locations to aid legibility and hierarchy within the development
- Buffer planting mitigates visual impact

## **Landscape Buffer Zones**

- · A variety of native species will be chosen to promote biodiversity.
- Boundary planting managed in order to provide an informal and natural setting without encouraging an unwanted fauna species that may compromise airfield safety.

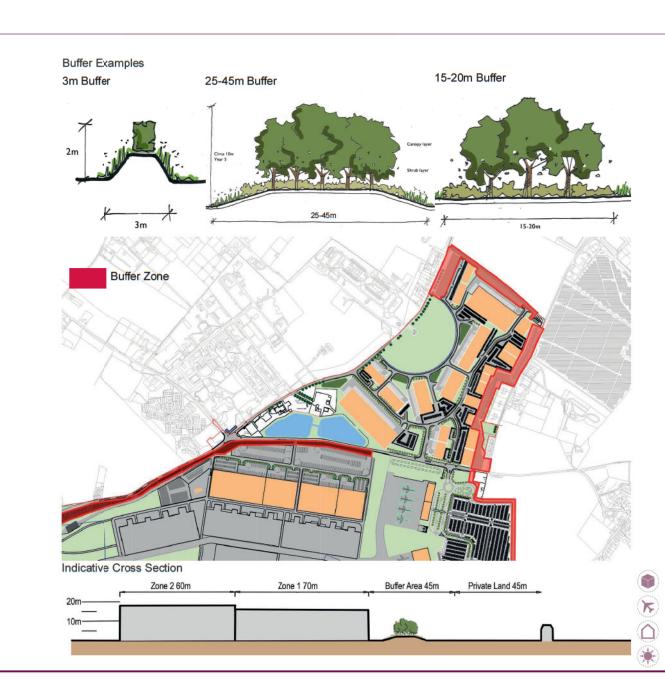
## **Example Design Principles:**

### **Landscape Principle C-25:**

Existing mature vegetation will be retained where possible and practical as part of the proposals to provide landscape maturity to the development and offer visualcontainment.

### Landscape Principle C-26:

Buffer planting is proposed along key boundaries to provide visual containment to the development and mitigate the impact on neighbouring properties.





## 6.0|Sustainability

See: Design Guide Section 7



## RSP

## **Building & Designing Sustainably**

- Recycling of existing building materials for new construction
- · Built in flexibility to accommodate future growth and change
- Application of sustainable materials & recycled aggregates for new construction
- Minimising waste and promoting recycling, during both construction and occupation.
- Reduce material that needs to be transported off-site
- Reuse of existing pavement infrastructure mitigates environmental impact & reduces generation of waste.
- Sustainable Drainage Systems

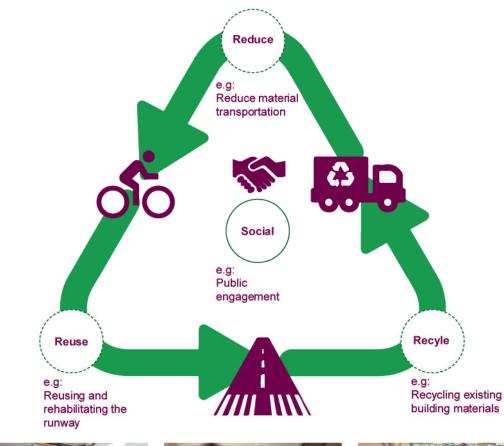
## Social Sustainability

- Previously amended the masterplan in direct response to public feedback
- Continued public engagement throughout the design process.

## **Example Design Principles:**

## Sustainable Design: Principle S-14

The existing airport pavement infrastructure has been reused where possible. For example the existing runway is being overlaid. The passenger apron and taxiway are also retained in the masterplan design. This mitigates the schemes environmental impact by reducing the requirement to create new infrastructure and reduces generation of waste.











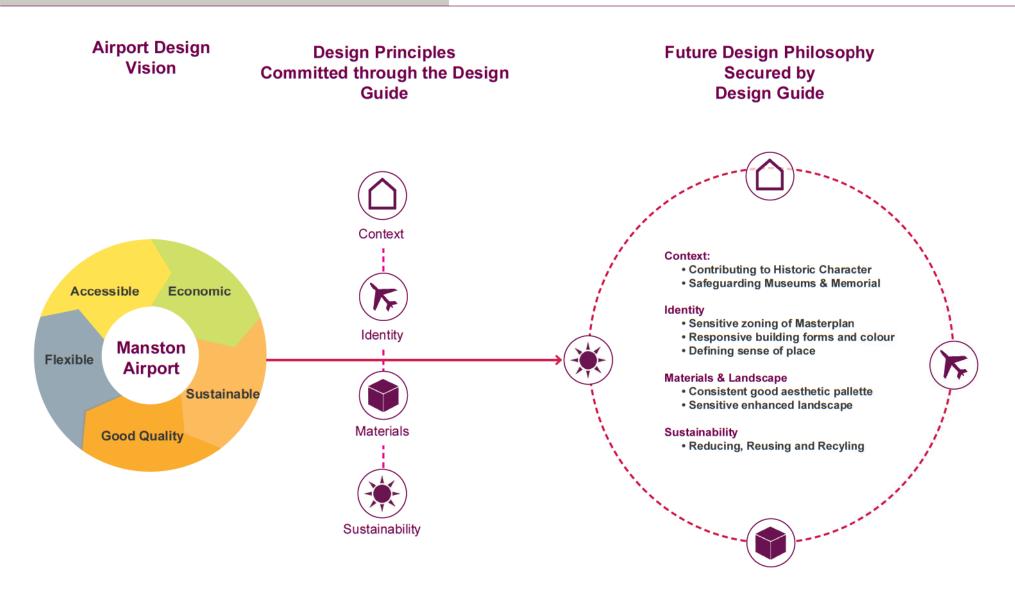






## RSP

## 7.0 | Summary













## 7.1 | Thank You for Your Time





## Appendix ISH4 – 1

## **Technical note:**

# Manston Airport Landscape and Visual Impact Assessment: Examining Authority clarification item 1

## 1. Introduction

This Technical Note has been prepared to provide a response to clarify an issue raised by the Examining Authority (ExA) following the Issue Specific Hearing 4 (landscape, design, archaeology and heritage) held on 3 June 2019. This relates to item 1 which states "Provide clarification in relation to the location and extent of bunding including where this has been assessed in the Environmental Statement (ES) and where it is secured in the draft Development Consent Order (dDCO)".

## 2. Applicant's response

## 2.1 Confirmed bunding

- The landscape strategy plans (also referred to as the Landscape Masterplan Drawings) submitted as Appendix LV.1.2 in response to the ExA's First Written Questions [REP3-187] confirm bunding in three main locations:
  - South of Spitfire Way opposite Rose Farm and Pounces Cottages. This bunding would be planted with a native screen planting mix;
  - Along the eastern boundary of the Northern Grass Area (west of Manston Court Road) at the northern end. This bunding would also be planted with a native screen planting mix; and
  - A low (approximately 1m high) linear earthwork which follows the eastern and northern boundary of the proposed car park south of Manston Road as indicated by Section A on page 37 of the Design Guide [REP4-024]. A hedgerow and extra heavy standard trees would be planted within this low bank to provide additional screening.
- The visual receptor group closest to the proposed bunding south of Spitfire Way is residential group 35 (Rose Farm and Pounces Cottages) for which visual effects have been assessed in Table 11.68 of the Environmental Statement (ES) [APP-057]. Whilst bunding in this area did not form part of the masterplan submitted as part of the DCO (and consequently was not assessed), a review of the assessment in Table 11.68 indicates that this bunding and the associated native screen planting mix are likely to screen views of the built form within the site by Year 10. The magnitude of change would continue to be High (and visual effects Significant, as assessed in the ES) due to the foreshortening of residents' views rather than large-scale built form appearing as prominent components of the view.
- The bunding along the eastern boundary of the Northern Grass Area is considered within the assessment for residential receptor group 38 (Terraced and semi-detached properties on the



eastern side of Manston Court Road) set out in Table 11.71 in Chapter 11 of the ES [APP-057]. The assessments for residential receptor group 39 (Properties around Manston Court on the eastern side of Manston Court Road), residential receptor group 40 (northern semi-detached properties on western side of Manston Court Road) and residential receptor group 41 (southern terraced properties on western side of Manston Court Road) set out in Tables 11.72, 11.73 and 11.74 of the ES [APP-057] respectively, were also based on the provision of bunding within the 45m wide buffer zone to the west of the receptor groups. The landscape strategy plans in Appendix LV.1.2 [REP3-187] indicate that no bunding would be placed in this area although a substantial belt of native screen planting would continue to be implemented. A review of the assessments contained within Tables 11.72, 11.73 and 11.74 indicates that the magnitudes of change (High) and levels of significance (Significant) remain valid. The proposed native screen planting would continue to provide screening as it gradually matures to ensure that the proposed built form within the Northern Grass Area would not become overbearing.

The linear bank along the eastern edge of the car park has been introduced in response to comments from Thanet District Council (TDC) in their Local Impact Report [REP3-010] and was not taken into consideration in the assessment of visual effects from Viewpoint 6 (Appendix 11.3 of the ES [APP-057]), visual receptor groups 31, 32 and 33 within Manston and group 42 (Jubilee Cottages). By Year 10, this planting would provide screening of cars within the car park and framed/filtered views of the proposed built components giving rise to a more positive eastern boundary to the airport. A review of the assessments for the receptor groups set out in Tables 11.64, 11.65, 11.66 and 11.75 of the ES and Table 2.6 of Appendix 11.3 [APP-056] indicates that the magnitudes of change and level of significance remain valid.

## 2.2 Additional bunding

- Section B of the Design Guide [REP4-024] now indicates that bunding would be placed along the western boundary of the Northern Grass Area and these earthworks are now illustrated on the Landscape Strategy Plans submitted at Deadline 8.
- Bunding along the western boundary of the Northern Grass Area was considered in the assessment set out for Viewpoint 2 in Table 2.2 of Appendix 11.3 of the ES [APP-057] and residential receptor group 47, as set out in Table 11.80 of the Environmental Statement [APP-034]. As such, the magnitude of change would remain High and visual effects would continue to be Significant as assessed in the ES.
- Should this bunding not be implemented or be affected due to the safeguarding of land for the Haine Link Road, screening would continue to be provided through the planting of mixed native screen planting buffer zones, and the row of trees that will replace those in the row of existing mature shrubs/semi-mature trees which would be removed, along the western boundary of the Northern Grass Area. This option for screen planting is now illustrated on the Landscape Strategy Plans submitted at Deadline 8.

## 2.3 Draft Development Consent Order (dDCO)

The landscaping works, which include bunding, are authorised via item (g) of Schedule 1 of the dDCO [REP5-002]; they are secured via the Landscaping Plan that is required under requirement 10 of the dDCO that must be approved by the Local Planning Authority.



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## Appendix ISH4 – 2

Manston Airport Landscape and Visual Impact Assessment: Thanet District Council Local Plan Draft Policy 23

# 1. Introduction

This Technical Note has been prepared in response to Issue Specific Hearing 4 (landscape, design, archaeology and heritage) held on 3 June 2019, specifically agenda item 2 which states "Provide a technical note assessing the robustness of the landscape assessment and the mitigations proposed against policy SP23", at the request of the Examining Authority.

# 2. Draft Policy SP23: Landscape Character Areas

## **Background**

- At the time of preparing the Landscape and Visual Impact Assessment (LVIA) (submitted as Chapter 11 in the Environmental Statement [APP-034] in July 2018) the draft Thanet Local Plan had not been published and the requirements of draft Policy SP23: Landscape Character Areas was not known. As a consequence, Table 11.1 of the LVIA [APP-034] listed adopted national and local policies at the time of the submission of the DCO.
- Since the submission of the DCO for Manston Airport, Thanet District Council (TDC) has submitted the draft Local Plan¹ to the Secretary of State for Communities and Local Government on 30th October 2018, for independent examination. Policy SP23 will be debated at the Examination on 18th July 2019 and may well change. TDC consulted on the draft Thanet Landscape Character Assessment (August 2017) at the same time as the Regulation 19 version of the new Local Plan (from August to October 2018). Following consultation and consideration of comments received, it is intended to make any relevant amendments to the document and then adopt it as a Supplementary Planning Document (SPD). This means that this will be one of the documents used to assess planning applications. The Thanet Landscape Character Assessment Statement of Consultation (August 2018) is a Core Document in the Local Plan Examination.
- In summary, both Policy SP23 and the Landscape Character Assessment remain in draft and could change before they are finally adopted.
- 2.1.4 Draft Policy SP23: Landscape Character Areas is due to replace extant Policy CC2 and states:

"The Council will identify and support opportunities to conserve and enhance Thanet's landscape character and local distinctiveness.

<sup>&</sup>lt;sup>1</sup> Thanet District Council. (2018). *Draft Local Plan to 2031. Pre-submission publication version, regulation 19*. [online] Available at: https://www.thanet.gov.uk/wp-content/uploads/2018/11/CD1.1-Draft-Thanet-Local-Plan-Reg-19.pdf



Development proposals should demonstrate how their location, scale, design and materials will conserve and enhance Thanet's local distinctiveness, in particular:

- 1. Its island quality surrounded by the silted marshes of the former Wantsum Channel and the sea;
- 2. A sense of openness and 'big skies', particularly in the central part of the District;
- 3. Its long, low chalk cliffs and the sense of 'wildness' experienced at the coast and on the marshes;
- 4. Gaps between Thanet's towns and villages, particularly those areas designated as Green Wedges;
- 5. Long-distance, open views, particularly across the Dover Strait and English Channel, North Sea and across adjacent lowland landscapes; and
- 6. Subtle skylines and ridges which are prominent from lower lying landscape both within and beyond the District.

Development proposals should demonstrate how they respect and respond to the character, key sensitivities, qualities and guidelines of the relevant landscape character areas, as detailed in the Landscape Character Assessment (LCA) and summarised below.

All development should seek to avoid skyline intrusion and the loss or interruption of long views of the coast and the sea, and proposals should demonstrate how the development will take advantage of and engage with these views.

Development should generally be directed away from the Stour Marshes (E1), Wade Marshes (E2) and Pegwell Bay (F1) character areas (as detailed in the LCA), as these are largely undeveloped and key to retaining the island character of Thanet. The undeveloped character of Landscape Character Type F: Undeveloped Coast should also be maintained.

Proposals on the coast (within landscape character types F: Undeveloped Coast and G: Developed Coast and the surrounding area) should respect the traditional seafront architecture of the area, maintain existing open spaces and should ensure that recreational and wildlife opportunities are not compromised by development. Proposals should maintain and enhance the setting of sandy bays, low chalk cliffs and associated grassland and long sweeping views of the coastline.

The rural-urban boundary is distinctive in some parts of Thanet, particularly where there is an abrupt urban edge and where the countryside extends into the urban areas as Green Wedges. The distinction between town and countryside should be retained.

Development proposals that conflict with the above principles will only be permitted where it can be demonstrated that they are essential for the economic or social well-being of the area. In such cases, landscape impacts should be minimised and mitigated as far as possible."

# Commentary with regard to the Landscape and Visual Impact Assessment and effects on landscape character

- Draft Policy SP23 identifies six criteria in the second paragraph which are considered in further detail with regard to the Proposed Development:
  - 1. Its island quality surrounded by the silted marshes of the former Wantsum Channel and the sea

The proposals at Manston Airport would not alter this criterion of local distinctiveness.



2. A sense of openness and 'big skies', particularly in the central part of the District

The sense of openness would be maintained across the southern part of the site through the retention of the existing runway. Across the central section of the site, the sense of openness would be subject to an incremental change with additional buildings adding to the existing built form within this area. The sense of openness within the northern part of the site (northern grass area) would be reduced through the introduction of the proposed built form and boundary planting both of which would contribute to an enclosed character which is more akin to that of the neighbouring villages of Manston to the east and Woodchurch to the west. The enclosure provided within these settlements is noted as a key characteristic of Local Character Area A1: Manston Chalk Plateau in the 2017 Thanet Landscape Character Assessment<sup>2</sup> which states "Tree belts and linear woodland with localised areas of paddocks and pasture provide enclosure around small villages of Manston and Woodchurch as well as scattered farmsteads".

- 3. Its long, low chalk cliffs and the sense of 'wildness' experienced at the coast and on the marshes

  The proposals at Manston Airport would not alter this criterion of local distinctiveness.
- 4. Gaps between Thanet's towns and villages, particularly those areas designated as Green Wedges

  The site is not designated as a Green Wedge in the draft Thanet Local Plan. The Proposed

  Development would play an incremental role to the long-standing built form and land use within the site.
- 5. Long-distance, open views, particularly across the Dover Strait and English Channel, North Sea and across adjacent lowland landscapes

Field surveys undertaken in respect of the Landscape and Visual Impact Assessment indicate that long distance open views towards the Coast and low-lying landscape to the south are primarily available from the crest of the chalk plateau to the south of the site looking in a southerly or south-easterly direction or from areas to the north of the site looking north/northeast. The Proposed Development would not interrupt these views as demonstrated by the visual assessment (Section 11.9 of the Environmental Statement (ES) [APP-034]) and viewpoint assessment (Appendix 11.3 of the ES [APP-057]).

6. Subtle skylines and ridges which are prominent from lower lying landscape both within and beyond the District

The skyline created by the southern edge of the chalk plateau from the lower lying landscapes within Thanet and Dover District to the south of the site is recognised as part of the landscape character sensitivity assessments (Appendix 11.2 of the ES [APP-057]) in particular from B1: Wantsum North Shore and E1: Stour Marshes within Thanet and Ash Level and Richborough Castle within Dover District.

An assessment of the effects of the Proposed Development upon this skyline is contained within Section 11.8 of Chapter 11 of the ES [APP-034] in particular Table 11.22 (LCA B1: Wantsum North Shore) and Table 11.27 (LCA E1: Stour Marshes). The assessments within these tables concludes that whilst there would be some slight skyline intrusion, this change would not be sufficient in scale to significantly alter the character and key characteristics of the respective character areas. As demonstrated in the revised wirelines (Appendix CA.1.4 [REP-187]) for viewpoint 12<sup>3</sup>, viewpoint 17 and viewpoint 20<sup>4</sup>, the proposed aircraft breakdown hangars are the principal component of the

<sup>&</sup>lt;sup>2</sup> Thanet District Council. (2017). *Landscape Character Assessment*. [Online] Available at: <a href="https://www.thanet.gov.uk/wp-content/uploads/2018/08/Thanet-LCA-Final-Report-09.081.5-with-plans.pdf">https://www.thanet.gov.uk/wp-content/uploads/2018/08/Thanet-LCA-Final-Report-09.081.5-with-plans.pdf</a>

<sup>&</sup>lt;sup>3</sup> This is one of the few views of the Proposed Development from within LCA B1: Wantsum North Shore.

<sup>&</sup>lt;sup>4</sup> Viewpoint 17 and 20 both lie within LCA E1: Stour Marshes.



Proposed Development which extends above the distant skyline. The flat, horizontal form of the roofline, which closely mimics the form of the skyline reduces the potential contrast. There are also opportunities to reduce the visual role of this built form further through appropriate façade treatment in accordance with design principle B-54 of the Design Guide [REP4-024] which notes how the mass of the hangars can be broken up by varied elevational treatment.

The Design Guide [REP4-024] sets out information in relation to the requirements of draft Policy SP23 for development proposals to "demonstrate how their location, scale, design and materials will conserve and enhance Thanet's local distinctiveness". The Design Guide [REP4-024], together with the landscape assessment presented in Section 11.8 of Chapter 11 of the ES [APP-034] demonstrates that landscape impacts have been minimised and mitigated as far as possible, as required in the final paragraph of draft Policy SP23. These measures include:

- Maintaining the open landscape across the southern third of the Site through the retention of the runway and locating built form towards the centre of the plateau, to the north of the most elevated section (as shown on Figure 11.30 of the ES [APP-041]) and the southern crest of the plateau;
- The retention of existing planting where no conflict with the masterplan occurs;
- Proposed landscape planting around the perimeters of the site concentrated along the eastern, northern and western boundaries of the northern grass area, along Spitfire Way/Manston Road and along the eastern boundary of the site south of Manston Road (i.e. along the boundary of the car park); and
- Building façade opportunities as set out in the Design Guide [REP4-024].

# 3. Conclusion

- The landscape assessment presented in Section 11.8 of Chapter 11 of the ES [APP-034] together with Appendix 11.2 of the ES [APP-057] provide a robust and transparent assessment of effects on landscape character. The assessment has been undertaken in accordance with the *Guidelines for Landscape and Visual Impact Assessment, Third Edition*<sup>5</sup>.
- This Technical Note provides further consideration of the potential effects on the landscape in relation to Policy SP23: Landscape Character Areas of the draft Thanet Local Plan. This has considered the potential landscape effects upon the six criteria listed as contributing to Thanet's local distinctiveness in draft Policy SP23 and sets out the mitigation measures incorporated in the Proposed Development to minimise landscape effects. The conclusion of the ES with regard to no significant landscape effects remains valid.

<sup>&</sup>lt;sup>5</sup> Landscape Institute and Institute of Environmental Management & Assessment (LI and IEMA). (2013). *Guidelines for Landscape and Visual Impact Assessment, Third Edition* 





#### **Kate Ward**

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#### **Management systems**

# Appendix ISH4 – 5

Manston Airport DCO: Historic Environment Issue-Specific Hearing Actions regarding revisions to the National Heritage List for England: Examination Authority clarification item 5

# 1. Introduction

This technical note sets out the Applicant's response to the action arising from Issue Specific Hearing 4: Design, Landscape, Archaeology and Heritage, held Monday 3 June 2019, to provide assessments of the nine listed buildings in Ramsgate added to the National Heritage List or upgraded from Grade II to Grade II\* by Historic England since submission of the Environmental Statement (ES) [APP-033].

# 2. Revisions to the National Heritage List for England

- As part of the Ramsgate Heritage Action Zone project, Historic England have added nine buildings to the National Heritage list, upgraded one (East Court) to Grade II\* and reviewed the list descriptions of a number of other structures. These are shown on **Figure 1** in **Appendix 1**.
- In response to a request from the Examining Authority, an Aviation Noise Metric (ANM) scoping exercise has been undertaken in respect of these structures. All of these listed buildings are located within the N60 contour, where N=20 and are identified at **Table 2.1**.

Table 2.1 Listed buildings designated or with amended grades or list descriptions since submission of DCO Application

List Entry	Name	Grade	National Grid Reference	LAeq (A) <sup>1</sup>	LAeq (B) <sup>2</sup>	LAeq (C) <sup>3</sup>	Cat	Scoped in ES	Further assessment required
1085406	24 Effingham Street	II	TR3810064924	57	57	54	n/a	Yes	No
1086050	Access road, underpass and retaining walls from Court Stairs to Western Underdiff	II	TR3676364114	<54	<54	<54	n/a	Yes	No
1086073	East Court	II*	TR3903765458	<54	<54	<54	n/a	Yes	No

<sup>&</sup>lt;sup>1</sup> Represents what is currently considered the most likely scenario whereby 70% of flights will land from the west and take off east, and 30% of flights will land from the east and take off west

<sup>&</sup>lt;sup>3</sup> Represents a worst-case scenario whereby 100% of flights land from the east and take off west



<sup>&</sup>lt;sup>2</sup> Represents a worst-case scenario whereby 100% of flights land from the west and take off east



List Entry	Name	Grade	National Grid Reference	LAeq (A) <sup>1</sup>	LAeq (B) <sup>2</sup>	LAeq (C) <sup>3</sup>	Cat	Scoped in ES	Further assessment required
1099103	22 Bellevue Road and railed area	II	TR3858165147	<54	<54	<54	n/a	Yes	No
1101734	Ramsgate Fire Station	II	TR3811364915	57	57	54	n/a	Yes	No
1203535	Granville House (the former Granville Hotel)	II	TR3879765183	<54	<54	<54	n/a	Yes	No
1203575	Former stable block to north of East Court	II	TR3900365481	<54	<54	<54	n/a	Yes	No
1336318	Sun shelter and rock gardens, Winterstoke Gardens	II	TR3916765579	<54	<54	<54	Α	Yes	No
1336319	Rock gardens and cliff stairs about 30 metres south of sunshelter	II	TR3919565551	<54	<54	<54	Α	No	No
1336326	Terracing, balustrades and arcades to Royal Parade	II	TR3820364688	<54	<54	<54	n/a	Yes	No
1336672	Royal Victoria Pavilion	II	TR3861364770	54	54	<54	n/a	Yes	No
1376681	Powder Magazine and walls	II	TR3819064441	<54	<54	<54	n/a	Yes	No
1460832	Victoria Gardens Kiosk	II	TR3877065086	<54	54	<54	n/a	No	No
1460833	Clarendon House Grammar School, groundskeepers' lodge, walls and railings	II	TR3800264888	57	57	54	n/a	No	No
1460979	51 Queen Street	II	TR3816764855	57	57	54	n/a	No	No
1461388	Augusta Villa	II	TR3865665236	<54	<54	<54	n/a	No	No
1461392	Aberdeen House, 68 Ellington Road	II	TR3763065184	54	54	54	n/a	No	No
1461401	Castle Cottage	II	TR3807265499	<54	<54	<54	n/a	No	No
1461618	Gateway to Barber's Almshouses	II	TR3793164924	57	57	54	n/a	No	No
1461895	NatWest Bank and associated office chambers	II	TR3818765070	54	54	54	n/a	No	No



List Entry	Name	Grade	National Grid Reference	LAeq (A) <sup>1</sup>	LAeq (B) <sup>2</sup>	LAeq (C) <sup>3</sup>	Cat	Scoped in ES	Further assessment required
1462637	Festival of Britain Fountain	II	TR3880065134	<54	<54	<54	В	No	No
1463597	1-12 West Cliff Arcade	II	TR3819864722	54	54	<54	n/a	No	No

- Of these designated heritage assets, the Grade II listed sunshelter and rock gardens (NHLE 1336318), located at Winterstoke Gardens and the Festival of Britain Fountain (NHLE 1462637) on Victoria Parade, were identified as potentially sensitive to noise effects.
- The Festival of Britain Fountain is not operating at present, meaning that any audible contribution to its significance arising from the sound of running and splashing water is latent. However, a restoration programme is underway and therefore this asset has been treated as sensitive, in line with the ANM. The fountain is located adjacent to a bus stop on the B2054 Victoria Parade and is outwith the 54dB LAEQ16 contour in all modelled scenarios. Consequently, no effect is anticipated.
- The Sunshelter and Rock Gardens at Winterstoke Gardens are located within the non-designated park at Winterstoke gardens and have consequently been assessed as potentially sensitive to audible change in setting in line with the ANM. These assets are adjacent to the northern end of the B2054 Victoria Parade, which becomes a no-through road immediately to the north of Winterstoke Gardens. While this means that the road has a quieter character north of Winterstoke Gardens compared to at its southern end, traffic noise is clearly audible and there is on-street parking at its western edge. This asset is outwith the 54dB LAEQ16 contour in all modelled scenarios and no adverse effect is anticipated.
- The change in grading of East Court (NHLE 1086073) does not affect the assessment presented within Chapter 9 of the ES [APP-033] and Appendix 9.1 [APP-052]. This asset is not identified as noise-sensitive within the definition provided by ANM and is located outwith the 54dB LAEQ16 contour in all modelled scenarios.

# 3. Conclusions

No change to the conclusions of the assessment of effects on the historic environment presented in Chapter 9 of the ES[APP-033] is required as a result of the revisions to the National Heritage List for England subsequent to the submission of the DCO application.

Issued by		Approved by	S 79
	· , , ,		
John Mabbitt		Ken Whittaker	-

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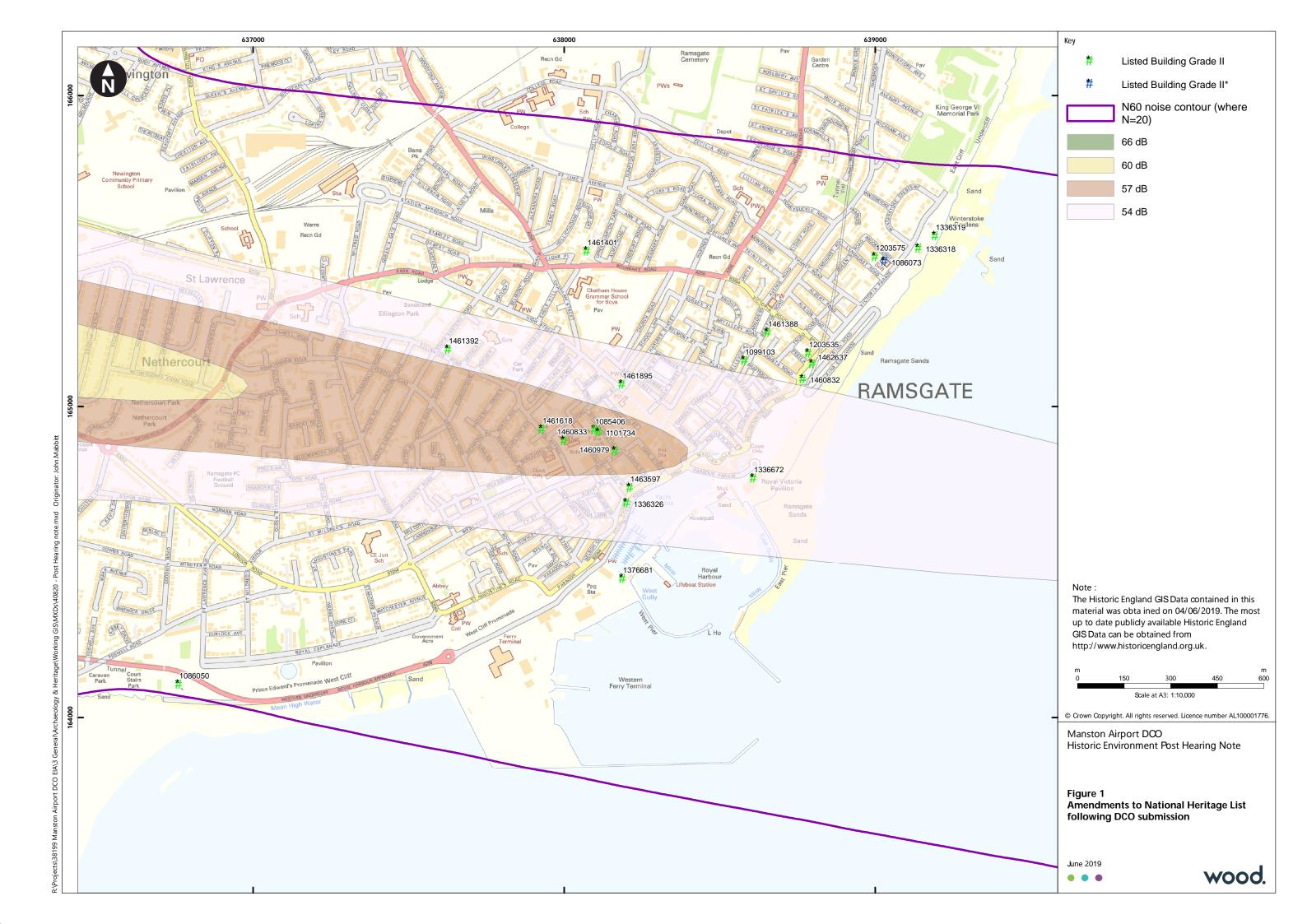
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#### **Management systems**

# **Appendix 1**



# Appendix ISH4 – 6

# Manston Airport Landscape and Visual Impact Assessment: Examination Authority clarification item 6

# 1. Introduction

This Technical Note has been prepared to clarify an issue raised by the Examination Authority (ExA) following the Issue Specific Hearing 4 (landscape, design, archaeology and heritage) held on 3 June 2019. This relates to item 6 which states "Provide a note explaining why paragraph 3.1.2 of Appendices to Answers to First Written Questions: 15th February 2019 Appendix LV.1.36 cites the hours of winter darkness in which aircraft may be flying at 07.00 – 08.00 rather than 06.00 – 08.00."

# 2. Applicant's response

Paragraph 3.1.1 of Appendix LV.1.36 issued at Deadline 3 [REP3-187] (and re-submitted with its accompanying appendices at Deadline 6 [REP-026] states, in relation to the assessment of visual effects of lighting on aircraft that:

"Consideration has been given to the potential effects of lighting on aircraft (including navigational lights, take-off and landing lights and anti-collision beacon lights) landing at and taking off from Manston Airport during the hours of darkness. At Year 10 there would be the equivalent of two flights an hour increasing to approximately four flights an hour by Year 20 between 07.00 and 23.00. Given the seasonal differences in day light hours it is anticipated that aircraft lighting would be visible in a dark environment for approximately two hours in the summer months (between approximately 21.00 and 23.00) increasing to a maximum of approximately 8.5 hours during the winter months (between approximately 15.30-23.00 and 07.00-08.00)."

The timings provided in paragraph 3.1.1 of Appendix LV.1.36 were made in relation to the 'normal' hours during which flights would operate at Manston Airport i.e. 07.00-23.00. It is however acknowledged that take-off and landing may also take place at Manston Airport between 06.00-07.00, although these are subject to certain restrictions as set out in Paragraphs 1.4 to 1.9 of the draft Noise Mitigation Plan. As a consequence, paragraph 3.1.1 of Appendix LV.1.36 should be revised to read:

"Consideration has been given to the potential effects of lighting on aircraft (including navigational lights, take-off and landing lights and anti-collision beacon lights) landing at and taking off from Manston Airport during the hours of darkness. At Year 10 there would be the equivalent of two flights an hour increasing to approximately four flights an hour by Year 20 between 07.00 and 23.00 with flights (subject to certain restrictions) also occurring between 06.00-07.00. Given the seasonal differences in day light hours it is anticipated that aircraft lighting would be visible in a dark environment for approximately two hours in the summer months (between approximately 21.00 and



23.00) increasing to a maximum of approximately  $\underline{9.5}$  hours during the winter months (between approximately 15.30-23.00 and  $\underline{06.00-08.00}$ )." <sup>1</sup>

The statement made in paragraph 3.1.2 of Appendix LV.1.36 remains valid.

Issued by Approved by

#### **Kate Ward**

2.1.3

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#### Management systems

<sup>&</sup>lt;sup>1</sup> Amendments underlined for clarity.

# Appendix ISH4 – 7

# Manston Airport DCO: Historic Environment Issue-Specific Hearing Actions Review of ES Assessments: Examination Authority clarification item 7

## 1. Introduction

This technical note sets out the Applicant's response to the action arising from Issue Specific Hearing 4: Design, Landscape, Archaeology and Heritage, held Monday 3 June 2019, to review assessments of change to setting arising from aviation noise to the Grade I listed Church of St George (NHLE 1085430) and associated funerary monuments and to the Grade II listed Albion Place Gardens due to their positioning within the 54dB and 57dB contours respectively.

## 2. Review of ES Assessments

## 2.1 Church of St George, Ramsgate and Albion Place Gardens

#### Church of St George and associated designated heritage assets

- These heritage assets comprise a group consisting of the Grade I listed church and associated Grade II listed structures comprising the churchyard gates and railings, War Memorial and funerary monuments.
- The information presented in **Table 2.1** is extracted from Appendix 9.1, Table E.3 [APP-052] of the ES and sets out the basis for the assessment presented in Chapter 9 of the ES [APP-033].
- The scoping exercise presented in Appendix 9.1 [APP-052], noted that some of these heritage assets, comprising a group of chest tombs to the north of the church would be outwith the 54dB LAEQ16 contour in all scenarios. Others, including the church, would be within the 54db LAEQ16 contour in some scenarios, while all would be located outwith the 54dB LAEQ16 contour in the most favourable scenario, where 100% of flights approach Manston Airport over Ramsgate. Appendix 9.1 Table E.3 [APP-052] incorrectly identified the church as outwith the 54dB LAEQ contour in Scenario B, although it was correctly noted in this table E.3 that the church was located within the 54dB LAEQ16 contour in Scenario A (anticipated operational conditions). For clarity, this is corrected at **Table 2.1**.



Table 2.1 Designated Heritage Assets at St George's Church, Ramsgate

List Entry	Name	Grade	National Grid Reference	LAeq (A) <sup>1</sup>	LAeq (B) <sup>2</sup>	LAeq (C) <sup>3</sup>	Cat	Assessed in detail in ES
1085430	Church of St George	I	TR3816665212	54	54*	<54	Α	No
1085432	Gates and railings to Churchyard of St George	II	TR3814065172	54	54	<54	Α	No
1336655	Tomb chest to William Blackman about 20 metres north west of Church of St George	II	TR3812965187	54	54	<54	Α	No
1348692	Tomb chest to Francis Lemm, about 5 metres north west of Church of St George	II	TR3813965197	54	54	<54	n/a	No
1432603	War memorial at St George's Church, Ramsgate	II	TR3814665187	54	54	<54	A	No
1085431	Tomb chest to Janet Mcleod about 42 metres north of Church of St George	II	TR3815065253	<54	<54	<54	Α	No
1100337	Tomb chest to Caroline Gibson about 40 metres north of Church of St George	II	TR3814865247	<54	<54	<54	A	No
1100343	Tomb chest to Kent family, about 25 metres east of Church of St George	II	TR3819765243	<54	<54	<54	Α	No
1336617	Tomb chest to Elizabeth Biggs and Thomas Grundy about 30 metres north of Church of St George	II	TR3815865248	<54	<54	<54	A	No

<sup>\*</sup>incorrectly cited in Appendix 9.1 Table E.3 (p. E20) as <54dB

The rationale for scoping these assets out of further assessment was provided at Table E.3 [APP-052] as:

'Heritage asset is located within urban area with a number of existing sources of noise, primarily arising from traffic movements. Audibility of specific background noise or lack of audibility of modern noise do not contribute to significance. Relative peace of the asset's setting contributes to significance to a degree, but this expectation is relative and existing urban noise is still readily discernible from within setting of the asset. Aviation noise at the restricted level projected would not give rise to adverse change.'

The scoping exercise acknowledged that the Churchyard of St George is located in a quieter area of the Ramsgate Conservation Area, and that the setting of the church and associated structures has been considered as a relatively tranquil area. However, the context of the churchyard remains a discernibly modern urban setting, and the viewer will be well aware of the modern urban

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<sup>&</sup>lt;sup>1</sup> Represents what is currently considered the most likely scenario whereby 70% of flights will land from the west and take off east, and 30% of flights will land from the east and take off west

<sup>&</sup>lt;sup>2</sup> Represents a worst-case scenario whereby 100% of flights land from the west and take off east

<sup>&</sup>lt;sup>3</sup> Represents a worst-case scenario whereby 100% of flights land from the east and take off west



environment around the church. Consequently, the very limited additional noise was not considered likely to be intrusive to the heritage interests of these assets and they were scoped out of further assessment.

- There is a very limited distance between the Scenario A and Scenario B contours approximately 15m and it is consequently unlikely that there would be any discernible difference in the noise experienced in these different scenarios, particularly when the nature of the noise effects anticipated (i.e. episodic and short-lived louder noises) is taken into account. It should also be noted that 54dB LAEQ is the lowest level at which Aviation Noise Metric (ANM) would anticipate a discernible effect that might influence the contribution of setting to the significance of heritage assets for which 'solitude, embedded with quietness, is intrinsic to understanding the form, the function, the design intentions and the rationale for the siting of a heritage asset' (Section 5.3) rather than a definitive clear quantitative threshold.
- The Church of St George was therefore scoped out of detailed assessment in the understanding that it was located on the periphery of the 54dB LAEQ16 contour and existing noise is, and will remain, discernible, such that the anticipated low magnitude changes will not alter the contribution of setting to the significance of the heritage assets. This review concludes that the original assessment is appropriate.

#### **Albion Place Gardens**

- This Grade II designated Park and Garden is located close to Ramsgate Marina. The ANM scoping exercise presented at Table E.3 of Appendix 9.1 [APP-052] of the ES noted that Albion Square Gardens would be located within the 54dB LAEQ16 contour in Scenario A (predicted normal operating conditions), within the 57 dB LAEQ16 contour in Scenario B (absolute worst case of all aircraft movements taking off in an easterly direction) and outwith the 57dB LAEQ contour in Scenario C (all aircraft movements taking off in a westerly direction).
- While parks and gardens are identified in the ANM as potentially sensitive to change in background noise, the designation boundary also includes B2054 Madeira Walk. This is the principal route along the Ramsgate seafront, which as it passes through the designation, climbs a steep hill with a tight corner meaning that vehicles are travelling under high power through the designated area. The National Heritage List map of the asset is appended to this note as **Appendix 1**.
- The southern part of the designation includes the vertical rock gardens between Albion Hill and Madeira Walk, and is adjacent to the junction of Harbour Parade, Harbour Street, Military Road and Madeira Walk where there are a number of pubs and restaurants.
- The lawns to the northern end of the designation formal garden provide what could be described as a relatively tranquil space, but it is still adjacent to the B2054 and has short-stay car parking to two sides, and any sense of tranquillity is entirely relative to the adjacent streetscape.
- Taken as a whole, the significance of Albion Place Gardens is clearly not dependent on the absence of discernibly modern, anthropogenic noise and it is not considered that any discernible adverse effect would arise as a result of the noise levels predicted.

# 3. Conclusions

The review of the assessments of the Church of St George, Ramsgate and associated structures and of Albion Place Gardens presented in the Chapter 9 of the ES [APP-033] have been reviewed in line with the Examining Authority request. It and it is concluded that these assessments remain appropriate.



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#### Management systems

# **Appendix 1**



This is an A4 sized map and should be printed full size at A4 with no page scaling set.

Name: ALBION PLACE GARDENS

Heritage Category:

Park and Garden

1001386

List Entry No :

Grade:

County: Kent

District: Thanet

Parish: Ramsgate

Each official record of a registered garden or other land contains a map. The map here has been translated from the official map and that process may have introduced inaccuracies. Copies of maps that form part of the official record can be obtained from Historic England.

This map was delivered electronically and when printed may not be to scale and may be subject to distortions. The map and grid references are for identification purposes only and must be read in conjunction with other information in the record.

**List Entry NGR:** TR 38463 64860

**Map Scale:** 1:1250

Print Date: 6 June 2019



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