

The Rt Hon Grant Shapps
The Secretary of State for Transport
Department for Transport
Zone 1/18, Great Minster House
33 Horseferry Road
London SW1P 4DR

BY EMAIL:

transportandworksact@dft.gov.uk

ManstonAirport@planninginspectorate.gov.uk

Cc: Rob.Pridham@dft.gov.uk

1 November 2019

Dear Sir

**RiverOak Strategic Partners (“the Applicant”)
Proposed Manston Airport Development (“Manston”)
Development Consent Order (“DCO”)
New Evidence since the Close of the Examination: Sources Historic England and Thanet
District Council**

A) New Evidence since the Close of the Examination: Source Historic England

1. On 27 October 2019, Historic England revealed the historic sites most at risk of being lost forever as a result of neglect, decay or inappropriate development by publishing the annual Heritage at Risk Register 2019¹. The Register gives an annual snapshot of the critical

¹ <https://historicengland.org.uk/whats-new/news/heritage-at-risk-2019/>

condition of some of the country's most important historic buildings, sites, monuments and places².

2. As you will be aware Ramsgate (the town directly under the proposed flight swathes at altitudes of 300-600 feet) **had the following sites added to the At Risk Register** in October 2019:
 - **The Conservation Area**³
 - **The Clock House, Royal Harbour**⁴
3. The Conservation Area added to the At Risk Register is the **largest conservation area in Kent**⁵ and is directly under the proposed flight swathe at altitudes of 300-600 feet.
4. The Clock House, Royal Harbour added to the At Risk Register is also directly under the proposed flight swathe at altitudes of 300-600 feet. Ramsgate's Royal Harbour is the only Royal Harbour in the UK and the HE Colliers Report of October 2018 describes as "***the defining visual and historical architectural feature of the town***".
5. The Ramsgate Royal Harbour is Grade II* listed⁶ and many of the buildings, arches and monuments surrounding and part of the Royal harbour are Grade I, II and II* listed⁷.

B) New Evidence since the Close of the Examination: Source Thanet District Council

6. On 24 October 2019, the contract for a feasibility study for Ramsgate port and Royal harbour⁸ was awarded to consultant WSP UK Limited by Thanet District Council. Part of the feasibility study is a residential plan to look at waterfront homes, and leisure uses such as

² <https://historicengland.org.uk/whats-new/news/heritage-at-risk-2019/>

³ <https://historicengland.org.uk/advice/heritage-at-risk/search-register/list-entry/6973>

⁴ <https://historicengland.org.uk/advice/heritage-at-risk/search-register/list-entry/278146>

⁵

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-003578-Five10Twelve%20-%20Comments%20on%20Responses%20to%20ExA's%20WQ%20-%20Appendix%20Section%20G-A.pdf>

⁶ <https://britishlistedbuildings.co.uk/england/ramsgate-thanet-kent#XbxKoGgvOow>

⁷ <https://historicengland.org.uk/whats-new/news/nine-of-ramsgates-historic-gems-listed/> and

<https://britishlistedbuildings.co.uk/england/ramsgate-thanet-kent#XbxKoGgvOow>

⁸ <https://www.kentbusinessportal.org.uk/>

space for larger yachts than can presently be accommodated in Ramsgate, hotel and conference facilities, berthing for small cruise ships and shops. Ideas for a maritime village development at Ramsgate port and Royal harbour will look at mixed use development with waterfront homes, shops, restaurants and cafes and commercial units.

7. The Ramsgate Royal Harbour is Grade II* listed⁹ and many of the buildings, military arches (currently occupied by retailers and restaurants) and monuments surrounding and part of the Royal harbour are Grade I, II and II* listed¹⁰.
8. The Ramsgate port and Royal harbour is also directly under the proposed flight swathe at altitudes of 300-600 feet.

Conclusion

These two pieces of new evidence from Historic England and Thanet District Council would materially and significantly affect Historic England's Statement of Common Ground as well as **the Local Impact Reports submitted** to the ExA by Thanet District Council and Kent County Council pursuant to Sections 60 Planning Act 2008¹¹.

Further, the statutory obligation on decision-makers to have special regard to the desirability of preserving listed buildings and their settings, and the policy objectives in the National Planning Policy Framework and the Planning Policy Guide coupled with Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and Section 66(1) of the 1990 Act as well as relevant case law *Barnwell Manor Wind Energy Ltd v East Northamptonshire District Council and Others* CA Feb 11 would be materially and significantly engaged.

⁹ <https://britishlistedbuildings.co.uk/england/ramsgate-thanet-kent#.XbxKoGgvOow>

¹⁰ <https://historicengland.org.uk/whats-new/news/nine-of-ramsgates-historic-gems-listed/> and <https://britishlistedbuildings.co.uk/england/ramsgate-thanet-kent#.XbxKoGgvOow>

¹¹ This further impacts sections 104 and 105 of the Planning Act 2008.