

Manston Airport Development Consent Order Examination Stage - Deadline 11

Ramsgate Heritage Assets Under Threat

A submission by The Ramsgate Society and The Ramsgate Heritage and Design Forum

1. Ramsgate is a town of great historical significance as reflected in its heritage assets. The designation by Historic England of Ramsgate in 2017 as one of the first ten areas to be declared a Heritage Action Zone (HAZ) was much welcomed by all parties with an interest in the town's future. The status recognises the exceptional quality of the historic built environment of the town, that it is at risk in an economically deprived area, but also that it is potentially a very valuable asset by which to boost the local economy.
2. The Heritage Action Zone partnership is made up of a variety of organisations working together with Historic England, (HE), to deliver projects in Ramsgate. This includes Thanet District Council, Ramsgate Town Council, Ramsgate Coastal Community Team and The Ramsgate Society.
3. Whilst HE has previously commented on the HAZ in its submissions to deadline 4 [REP4-058] and deadline 8, [REP8-026], it is clear from these submissions that the organisation has approached the questions relating to the HAZ purely from the perspective of potential physical impact on heritage assets. HE has recognised in these submissions, however, 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".
4. It is with these socio-economic impacts in mind that The Ramsgate Society, as one a core member of the HAZ partnership responsible for local delivery, wishes to submit this further evidence to the ExA.
5. Through the Heritage Action Zone (HAZ) initiative HE and the local HAZ partnership is looking to unleash the potential in Ramsgate's historic environment to create economic growth and improve the quality of life for local residents. The Ramsgate five-year HAZ programme aims to regenerate the local economy by capitalizing on its rich maritime heritage and historic environment.
6. There are 463 listed buildings including nine that were added in May 2019 as a direct result of HAZ research. These additions are further evidence of the growing recognition of the importance of Ramsgate heritage. The 'jewel in the crown' is Ramsgate's harbour - the only Royal Harbour in the UK, was so designated by George IV in 1821. There are major plans to celebrate the 200th anniversary of that historical event. The Royal Harbour was recently described as "...the defining visual and historical architectural feature of the town" (Creative Industries in Historic Buildings and Environments, Colliers, October 2018, pg. 76, para 3.7.1). It lies directly on the Manston

flightpath.

7. The Society and other volunteers working with Historic England have recently completed a detailed assessment of Ramsgate's four Conservation Areas which is intended to provide evidence for grant applications to improve the quality of some of the buildings and public realm that underpin the attraction of the town as a tourist destination.
8. A reopened Manston airport would have major adverse socio-economic impact on the heritage assets of the town by damaging what Historic England (HE) calls the 'setting' of those assets. HE offers advice in assessing development proposals in '*The Setting of Heritage Assets, Planning Note 3 (2nd Edition)*', December 2017. This document sets out guidance against the background of the National Planning Policy Framework (NPPF) and the related planning guidance given in the Planning Practice Guide (PPG) on managing change to the settings of heritage assets. We draw on that document and comment on the significance for Ramsgate in relation to the airport proposals.
9. The built-up area of Ramsgate lies in an area between 1.2km and 4.0km from the runway directly on the flightpath.
 - 9.1. '*Development further afield may also affect significance, particularly where it is large scale, prominent or intrusive*' (SHA, pg. 5).
10. In this instance, '*large scale*' may reasonably include a development being examined as a Nationally Significant Infrastructure Project (NSIP) and '*intrusive*' may reasonably include low-flying aircraft as a result of the "*implications of development affecting the setting of heritage assets*" (SHA, pg. 8, para 17)
 - 10.1. "*Evaluation may need to extend to cumulative and complex impacts which may have as great an effect on heritage assets as large-scale development and which may not solely be visual*" (SHA, pg. 12, para 32)
 - 10.2. '*... assessment should address the attributes of the proposed development in terms of its .. wider effects*' (SHA, pg. 12, para 33)
 - 10.3. "*Wider effects of the development (includes) Economic viability*" (SHA, pg. 13)
11. '*Cumulative and complex impacts*' and "*wider effects*" of a development may reasonably include low flying aircraft at 500ft - 600ft above the Ramsgate Central conservation area, and a mere 200ft at the western most area of the HAZ as a result of the development
 - 11.1. "*Views which contribute more to understanding the significance of a heritage asset include: those with historical associations, including viewing points and the topography of battlefields.* (SHA, pg. 6, para 11)

12. 'Historical associations' might also reasonably include the designation of Ramsgate as a Royal Harbour by King George IV in 1821 as well as its role in the 'Little Ships' evacuation of Dunkirk, for example:

12.1. *"Those with cultural associations, including landscapes known historically for their picturesque and landscape beauty, those which became subjects for paintings of the English landscape tradition, and those views which have otherwise become historically cherished and protected"* (SHA, pg. 6, para 11)

12.2. *An assessment of the contribution to significance of a view does not depend alone on the significance of the heritage assets in the view but on the way the view allows that significance to be appreciated. The view may be part of a landscape, townscape or other design intended to allow a particular attribute of the asset to be enjoyed ... Composite or fortuitous views which are the cumulative results of a long history of development, particularly in towns and cities, may become cherished and may be celebrated in artistic representations"*(SHA, pg. 11, para 30)

13. These are but three of many examples: Thanet's skies -- minus aircraft -- are a key contributing factor to the setting of the HAZ, with JMW Turner immortalising them in numerous works in the English landscape tradition and famously writing *'the skies over Thanet are the loveliest in all Europe'*. Ramsgate Sands, with the Eastcliff section of the conservation area, (which has hardly changed since the original painting) as a backdrop, are the subject of Frith's 'Life at the Seaside' in the Royal Collection and Royal Road, Ramsgate, is the subject of a pencil sketch by Van Gogh during his residency in the town in 1876.

13.1. *"Coastal or island location ... may increase the sensitivity of the setting (ie the capacity of the setting to accommodate change without harm to the heritage asset's significance)"* (SHA, pg. 7-8, para 17)

13.2. *"A thorough assessment of the impact on setting needs to take into account, and be proportionate to, the significance of the heritage asset under consideration and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it"*, (SHA, pg. 2)

13.3. *"Consideration of setting in urban areas, given the potential numbers and proximity of heritage assets, often overlaps with considerations both of townscape/urban design and of the character and appearance of conservation areas"* (SHA, pg. 4)

14. We are clear that the HE advice document points to a legitimate case of detriment to the heritage assets and the ability to appreciate them, given the scale, fleet mix and proximity of flights proposed by RSP.

14.1. *"Need to consider the fact that developments which materially detract from the asset's significance may also damage its economic viability now, or in the future, thereby threatening its on-going conservation"* (SHA, pg. 2)

14.2. “The way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust and vibration” (SHA, pg. 2)

15. This is particularly relevant to the aims of the HAZ and concerns raised by our HAZ partners, Ramsgate Town Council, in its written statements to the ExA, [REP1-035] and [AS-141].
16. If the airport was to come into operation, with its close proximity to the town, with its associated noise, air pollution, and visual intrusion then potential funders and grant awarding bodies would no longer look favourably on Ramsgate as worthy of investment since benefits would immediately be eroded by negative impacts of the airport, thus reinforcing a spiral of decline. The airport would kill tourism in general and regeneration via heritage in particular.
17. We take this opportunity to examine noise impact on the heritage assets more closely. We have access to the CAA/ ERDC noise contour modelling results (commissioned by IP FiveTenTwelve). The CAA and its consultancy subsidiary together are the foremost authority in the UK on aviation noise modelling. These results have far greater credibility than those tabled by RSP.
18. Figure 1 is a map of Ramsgate showing each of the four conservation areas, the location of all listed buildings (using HE data), with a noise contour overlay (the 70% W, 30% E pattern). (source CAA/ERDC). We focus on the 57dB and 60dB noise contours. The same critical values used in the London City Airport Noise Mitigation Plan, and the noise thresholds used to trigger levels of compensation and mitigation measures.

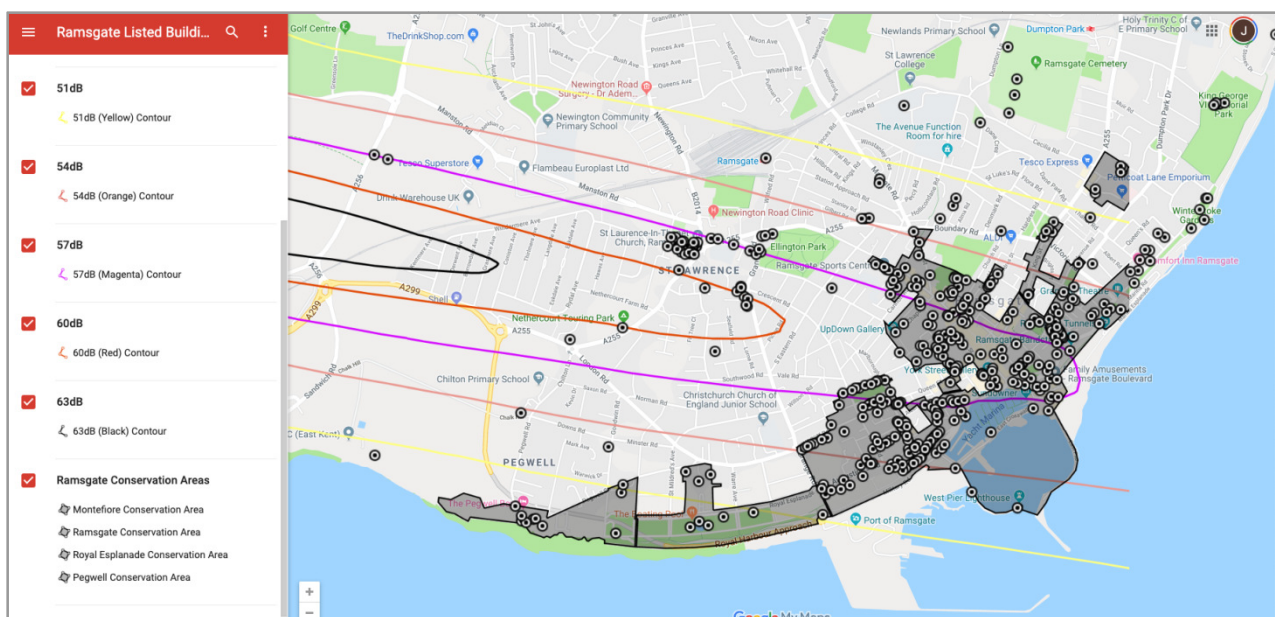


Fig. 1 Ramsgate Listed Buildings and Conservation Areas in relation to CAA Noise Contours

19. The contours reflect the flight path directly over the Central conservation area that includes the Royal Harbour, and precisely over the densest clustering of Listed properties. The map and constituent data files reveal that 231 of the total of 463 Listed buildings fall within the 57dB noise contour, and a further 7 within the 60dB zone. Irrespective of all other properties, 238 Listed buildings will be subject to severe aviation noise that ought to qualify for noise mitigation measures and compensation. That is **51% of all listed properties in Ramsgate**.
20. Noise mitigation measures such as double/triple glazing and sound insulation are notoriously difficult to apply to Listed buildings. These measures are expensive, complicated, historically damaging, architecturally unacceptable or impossible such that they are not implemented. This process puts these heritage assets at risk. Their survival depends on being in 'beneficial use' which would be jeopardised under a deteriorating setting brought about by noise and visual disturbance from aircraft.
21. In September 2015 the DCO application for Proposed Navitus Bay Wind Park (ref EN010024) was refused by the Secretary of State on the grounds that the adverse effects on a designated heritage asset were unacceptable even though in the case they were largely 'visual' and temporary. He made specific reference to the relevant NPS (EN-1, para 5.8.14):
- 21.1. *"There should be a presumption in favour of the conservation of designated assets and the more significant the designated heritage asset the greater the presumption in favour of its conservation should be. Once lost the heritage assets cannot be replaced, and their loss has a cultural, economic and social impact. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Loss affecting any designated heritage asset should require clear and convincing justification. Substantial harm to a Grade II listed building, park or garden should be exceptional."*
22. In Ramsgate all the heritage assets would be at a serious and permanent risk from a reopened Manston as noise, visual disturbance and pollution would rapidly lead to a deteriorating setting for the assets. Downward spiralling socio-economic impacts would lead to deterioration of the visitor and tourist economy, and there would be a lack of inward investment.
23. We strongly urge the ExA to recommend refusal of the DCO.

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