

Re-determination of the Application by RiverOak Strategic Partners Limited (“the Applicant”) for an Order granting Development Consent for the reopening and development of Manston Airport in Kent.

Consultation on The Independent Aviation Assessor’s Draft Report And The Representations Received On The Statement Of Matters

Application Ref: TR020002

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

Registration ID No. 20014009

Our Ref: PA00513760

Dated: 29 November 2021


To: manstonairport@planninginspectorate.gov.uk

1. Context for our Historic England submission

1.1. We do not wish to comment about the Independent Aviation Assessor’s Draft Report, or the representations received in response to the First Round of Consultation.

1.2. However, we advise that since the closure of the First Round of Consultation on 09 July 2021 there has been a change to historic environment policy (the National Planning Policy Framework) and the publication of relevant new information (the Ramsgate Conservation Area Appraisal - Consultation Draft).

2. The Ramsgate Conservation Area Appraisal Consultation Draft

A public consultation on the Ramsgate Conservation Area Appraisal Consultation Draft began on 01 November 2021. The draft is available on Thanet District Council’s website ()

[REDACTED]). The six-week consultation period closes at midnight on 13 December.

2.1. Conservation area appraisals help Councils and local communities to preserve the special character of a conservation area by:

2.1.1. Providing a framework against which future development proposals in the conservation area can be assessed and determined;

2.1.2. Outlining the history of an area and what makes it special; and

2.1.3. Supporting a Council's legal duties (under section 71 of the Planning (Listed Buildings and Conservation Areas) Act 1990) to prepare proposals for the preservation and enhancement of the conservation area and to consult the public.

2.2. The Ramsgate Conservation Area encompasses the greater part of the town as it was during the early-twentieth century. The suburbs of Dumpton, Northwood, St Lawrence and Pegwell are not included within its boundary.

2.3. The Consultation Draft confirms that the area has exceptional historic and architectural interest as a coastal resort town and working harbour. It has a fine array of heritage assets dating from the seventeenth- to the twentieth-centuries.

2.4. We note that the Consultation Draft says that tranquillity is a characteristic of the genteel eighteenth- and nineteenth-century residential squares, crescents, lawns and gardens, which are elements of the special interest of the town. It also mentions that some other open spaces are tranquil elements of the Conservation Area.

2.5. It says that these spaces have historic interest as a fundamental part of the planned formal development of eighteenth- and nineteenth-century Ramsgate, but also provide enclosed, tranquil spaces that relieve the hard, urban townscape.

2.6. Therefore, it is possible that an increase in noise, such as operational aircraft noise, may cause harm to this aspect of the town's heritage significance.

3. The National Planning Policy Framework

3.1. The National Planning Policy Framework was revised on 20 July 2021.

3.2. The heritage policies within the NPPF have been re-numbered but otherwise are largely unchanged except for the addition of a new paragraph (number 198), which emphasises the importance of retaining and historic statues, plaques, memorials and monuments, and explaining their historic and social context.

3.3. More broadly, the NPPF now gives greater emphasis to design quality, the environment and sustainability in development.