



Historic England

Department for Transport
FREEPOST RUNWAY CONSULTATION

By email: runwayconsultation@dft.gsi.gov.uk

19th December 2017

Dear Sir/Madam

Consultation on Revised Draft Airports National Policy Statement: New Runway Capacity and Infrastructure at Airports in the South East of England – Historic England response

Historic England is the Government's statutory adviser on the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Digital, Culture, Media & Sport (DCMS). We champion and protect England's historic places, providing expert advice to local planning authorities, developers, owners and communities, to help ensure our historic environment is properly understood, enjoyed and cared for.

We do not intend to repeat detailed comments made in response to the first consultation on the draft National Policy Statement (NPS) in February 2017 in their entirety – our comments below focus on amendments made to the text since that point or on points of importance not yet addressed. Our previous response is attached elsewhere to this letter. We would, however, repeat our overarching comment made in that response that the Government's preferred option for airport expansion in the South East of England (the new North West Runway at Heathrow) is clearly the most damaging to the historic environment.

We have been working closely with Heathrow Airport Limited over recent months on their preparations for the potential expansion of the airport. Nevertheless, at this stage there remains some uncertainty over the likely impacts, in part at least due to final boundaries and access points having still to be identified. Similarly, until the final scheme design is completed any impacts from the construction phase cannot be considered in any meaningful way.

It is therefore of crucial importance that the approach within the NPS and the accompanying Appraisal of Sustainability properly reflects the requirements of the National Planning Policy Framework (NPPF) in order to ensure that historic environment considerations are taken into account and addressed by the process. Our comments below are intended to help ensure that this is the case.



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I trust these comments are useful in your deliberations. We would be pleased to discuss them in person if that would be helpful – please feel free to contact my colleague Tim Brennan (020 – 7973 3744 or tim.brennan@historicengland.org.uk) if this is the case.

Yours faithfully

Carol Pyrah
Assistant Director of Planning

Detailed comments

Revised Draft Airports National Policy Statement: New Runway Capacity and Infrastructure at Airports in the South East of England

Chapter 4 – Assessment principles

The National Policy Statement for National Networks under the ‘Environment and Social Impacts’ section, in explaining the relationship of the National Policy Statement with wider Government planning policy, contains the following paragraph (3.3):

‘In delivering new schemes, the Government expects applicants to avoid and mitigate environmental and social impacts in line with the principles set out the NPPF and the Government’s planning guidance. Applicants should also provide evidence that they have considered reasonable opportunities to deliver environmental and social benefits as part of schemes. The Government’s detailed policy on environmental mitigations for developments is set out in Chapter 5 of this document.’

It would be useful to include a similar paragraph in the *Draft Airports NPS*, to ensure clarity of the relationship between this policy statement and national planning policy. This could follow on from paragraph 4.5.

Paragraph 5.203: The *Draft Airports NPS* does not deal adequately with the significance of non-designated heritage assets as part of the decision-making process (as set out in the *National Planning Policy Framework*). We strongly advise that paragraph 135 of the *National Planning Policy Framework* is included after paragraph 5.203 to ensure Government deals with the issue consistently:

‘The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly

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or indirectly non designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.'

Paragraph 5.205: Overall paragraph 5.136 of the *National Policy Statement for National Networks* contains similar wording to that contained in the *Draft Airports NPS*. However, we suggest the following change to the revised draft Airports NPS to ensure a consistent policy approach:

'Where the loss of significance of any heritage asset is justified on the merits of the new development, the Secretary of State will consider imposing a requirement on the consent, or require the applicant to enter into an obligation, that will prevent the loss occurring until it is reasonably certain that the relevant part of the development ~~is to proceed~~ has commenced.'

Revised Appraisal of Sustainability for the Draft Airports National Policy Statement

Our detailed comments relate to both the main report and the relevant appendices (*A-11 Historic Environment, A-12 Landscape and A-2 Quality of Life*). It should be noted that the following comments on the main report should be considered alongside those on the appendices. Where appropriate, the comments in the appendices are also applicable to the relevant sections of the main *Appraisal of Sustainability* Report.

Main Report

Table 4-1 (page 37): For consistency with the remainder of the document and particularly the appraisal questions, we recommend that the sustainability objectives for the historic environment are revised as follows:

- Effects on the significance of designated heritage assets and their settings, from physical work or indirectly during the construction and operation of proposals, e.g. through surface transport or aviation noise.
- Effects on the significance of non-designated heritage assets and their settings, from physical work or indirectly during the construction and operation of proposals, e.g. through surface transport or aviation noise.
- Effects on historic landscape or townscape.
- Potential to conserve and enhance the significance of heritage assets.

Similarly, under landscape, we would suggest that 'waterscape' is included under the second heading, so that it reads: 'townscape and waterscape character and quality'.

Table 4-2 Historic Environment (Cultural Heritage) (page 43 and *Appendix A-11*): We recommend an additional appraisal question is used to test the *Draft Airports NPS*: 'Will it

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improve access to/and interpretation, understanding and appreciation of the significance of heritage assets?

Table 4-2 Landscape (page 43): We advise appraisal question 36 is amended to include 'sensitive views and settings' to ensure consistency with page 68. Question 35 as drafted does not properly reflect the issues in that it focuses on purely '*designated landscape, townscape and waterscape*'. This issue has been addressed in the current consultation on the draft Water Resources NPS by using the following wording, which we suggest is added to the end of this question:

'...or affect the intrinsic character or setting of local landscapes and townscapes?'

Paragraphs 6.13.6, 6.13.9 and 7.4.113: We would refer to you our previous consultation response on the number of heritage assets identified as affected by the proposals. Clarification on total numbers and how they have been arrived at would be welcome.

Page 137: After the first bullet under the sentence 'Following determination of significance ...' to we would recommend adding 'for non-designated assets a balanced judgement will be required having regard to the scale of harm or loss and the significance of the heritage asset'. This will achieve consistency with the *Historic Environment Appendix A-11* (paragraph 11.10.7).

Table 7-3 Landscape (page 139):

In line with our comments above the 'Summary of Significant Effects' should consider all landscapes and not just those that are designated. Please also refer to our comments on the *Landscape Appendix A-12* below.

Table 7-4 Historic Environment (page 145): It would be helpful to add the following to the list headed '*Proposed Monitoring*': to monitor/review off-site mitigation/enhancement strategy and its implementation. All key decision-makers and interested parties should be involved in the monitoring and not just the applicant.

Table 7-4 Landscape (page 145): The focus on designated areas should be wider – please see comment in regard to table 4-2 above.

Revised Appendix A-11 Historic Environment

Paragraphs 11.1.5: We advise that AoS Question 34 is amended to read. 'Will its construction and operation lead to ..' (see also page 24). We note this has now been removed from the main AoS report and should be reinstated (Table 4-2 page 43 and Table 6-1 page 67).

Paragraphs 11.9.4-7, 11.9.11-14, 11.9.18-21: These sections deal with the impacts of noise and surface access corridors, both of which have the potential to affect the significance of heritage assets, such as the Grade I Great Barn at Harmondsworth. However, the details provided do not allow for any qualitative understanding of the scenarios described, whilst insufficient information is available on surface access corridors and the heritage assets affected.. Further information, clarity and understanding is needed here.

Question 31 (page 18). Given that surface access corridors are included, it would be useful to get clarification of how the number of heritage assets that were identified and collated, so avoiding potential duplication of figure/assets.

Page 26: Reflecting our comments to the main report Table 4-2 Historic Environment (Cultural Heritage) (page 43) and paragraph 11.1.5 of this Appendix, we would suggest an additional appraisal question is used to test the *Draft Airports NPS*. This question is: *'Will it improve access to/and interpretation, understanding and appreciation of the significance of heritage assets?'*

Paragraph 11.10.8: The assessment described should also include the review and updating of entries on the National Heritage List for England, rather than after the loss as described in paragraph 11.10.14. This will also need to be addressed in the main AoS report.

Paragraph 11.10.14: There may be opportunities for relocating buildings together with other heritage assets to sites other than museums (informed by appropriate recording) and we would wish this to be made clear. This will also need to be addressed in the main AoS report.

Conclusions (pages 30-32): As previously raised we would seek clarification in the figures provided in paragraphs 11.12.4 and 11.12.7. For LGW-2R, 13 not 12 archaeological notification areas are present in 11.2.8 and these figures only include the Land Take and Intermediate Study Areas – no HER search was carried out for the Outer Study Area.

Revised Appendix A-12 Landscape

We remain concerned that the heritage significance of the wider landscape character is not fully recognised with details provided emphasising protected landscapes, the natural environment and tranquillity only. Similar concerns and issues can then be found in the main *AoS Report*.

Paragraph 12.1.5 and page 26: As mentioned in the response to the main report we would advise the appraisal question 35 is revised so that its focus is not purely on 'designated landscape, townscape and waterscape'.

Paragraph 12.1.5 and page 28: We would advise appraisal question 36 is amended to include ‘*sensitive views and settings*’ to ensure consistency with the main *AoS Report* (page 68).

Paragraph 12.1.5: Whilst acknowledging the important role of Natural England in relation to the ELC, we were surprised there is no mention of Historic England. This omission highlights the emphasis on the natural environment in the landscape appendix.

Paragraph 12.2.6 – 12.2.9: In referencing the *National Planning Policy Framework*, the emphasis appears to be on the natural environment and this is then the focus for those paragraphs on the *Planning Practice Guidance* (12.2.12 – 13).

Paragraph 12.7: We are concerned that the sources of information cited in the mitigation measures proposed by each promoter in the landscape appendix differ from those in the *Historic Environment Appendix A-11* (paragraph 11.7). In both cases for the historic environment these are inadequate and fail to meet the requirements of national policy, but unlike the *Historic Environment Appendix A-11* (paragraph 11.7.5), the landscape appendix does not acknowledge this deficiency. We would advise that this point is reviewed and a similar paragraph to that provided in *Appendix A-11* (paragraph 11.7.5) is included here.

Revised Appendix A-2 Quality of Life

Despite the heading ‘Access to nature and cultural heritage’, there are no direct references to the historic environment under objective 3 question five (**page 37**) and it is not clear why LHR-NWR is given a mixed positive / negative effect when compared with the negative effects for LGW-2R and LHR-ENR (see also **page 52**). We note the reference to *Appendix A-11 Historic Environment* under Mitigation Measures (paragraph 1.10.1) and the cultural heritage in paragraphs 2.12.3, 2.12.9 and 2.12.15, but as with LGW-2R cumulative impacts also need to be recognised for LHR-ENR and LHR-NWR. Finally, in tables 2.5, 2.6 and 2.7 the same generic effect is given for all three schemes, but only for the operational and not construction phase, with which we disagree.