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Dear Sirs

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

Historic England is the Government's statutory adviser on all matters relating to 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 Culture, Media and 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.

Summary

As we set out in our submission to the 2015 Airports Commission's consultation, of the three options put forward for increased airport capacity in the South East, the new Northwest Runway at Heathrow is the most damaging to the historic environment. This option is likely to result in the loss of 21 designated heritage assets within the Land Take, but the bald numbers mask the seriousness of some of the impacts, such as the unprecedented total loss of Longford Conservation Area and substantial loss in the Harmondsworth Conservation Area. This option will also potentially have an adverse impact on a further 220 designated heritage assets by affecting their settings. Of particular concern is the effect on the Grade I listed Harmondsworth Barn, one of the country's finest tithe barns which was described by Sir John Betjeman as the 'Cathedral of Middlesex'.

In order to be able to comment on the specific impacts we will, in most cases, need to see more detail. For example, the necessary alterations to the road and rail access to the airport could do further damage to heritage assets and their settings. Conversely, there may be potential for delivering some environmental benefits/enhancements to the heritage assets in the area around the airport.

Historic England supports the approach set out in the Draft Airports NPS and in the accompanying Appraisal of Sustainability (AoS). We welcome its alignment with the Government's *National Planning Policy Framework* with regard to the management of change in the historic environment and to the importance of good design. In particular, we are encouraged by the approach promoted in the Draft Airports NPS and AoS that seeks appropriate opportunities to enhance and better reveal the significance of heritage assets. The first responsibility of the promoter, however, is to avoid or minimise harm to heritage assets. Only once harm has been minimised can compensatory enhancements be taken into account. We recommend that the cost of non-standard noise abatement measures in sensitive locations should be factored into calculations of community compensation.

At present, the promoter's strategy for handling the historic environment implications of the Northwest Runway scheme falls far short of the requirements set out in the Draft Airports NPS. These inadequacies will need to be addressed by the promoter under the approach put forward in the Draft Airports NPS and AoS and in line with our comments. This is likely to include gaining a full understanding and assessment of the significance of the heritage assets affected – not confined to designated ('Listed') assets – and an assessment of the impact of the scheme on their significance. We note that the Government expects any applicant to complete this sort of work ahead of seeking development consent through the Nationally Significant Infrastructure Project process.

Additional detailed comments on the Draft Airports NPS are set out in Appendix A and on the AoS in Appendix B.

Consultation Questions

In response to the consultation questions we have the following comments to make:

Question 2: Please give us your views on how best to address the issue of airport capacity in the South East of England by 2030. This could be through the Heathrow Northwest Runway scheme (the Government's preferred scheme), the Gatwick Second Runway scheme, the Heathrow Extended Northern Runway scheme, or any other scheme.

Historic England is not qualified to comment on the broad issue of airport capacity but we seek to ensure that, when assessing how to address the issue of airport capacity, the conservation of heritage assets is given great weight, in accordance with the Draft NPS (5.189). In this context Historic England supports the need to undertake a proportionate but sufficient assessment of the potential harm that each scheme under consideration will have upon the historic environment, working from the principle of first avoiding and, second, mitigating harm to the significance of heritage assets. Harm to heritage assets needs to be convincingly justified, in line with national planning policy. Prospective proposers of schemes should not assume that non-

designated heritage assets are necessarily of low significance; in some cases a fresh assessment by Historic England may result in statutory designation.

Since advising in February 2015 that the Heathrow Northwest Runway option appeared to be the most harmful of the three under consideration (including the unprecedented loss of an entire Conservation Area), Historic England has maintained positive engagement with a Steering Group set up by the Department for Transport, and through our response to the Statutory Environmental Bodies Consultation on the Scoping Report. The AoS Report accompanying the Draft Airports NPS endorses our initial conclusion and that all of the options, including the Northwest Runway Heathrow option, will have a 'Significant Negative Effect' on the historic environment. With this in mind we would welcome further discussions on how the harmful impacts of the Northwest Runway upon heritage assets and the wider historic environment could be avoided, minimised and where appropriate enhanced, through a proactive strategy for the historic environment as part of any future development consent.

Question 3: The Secretary of State will use a range of assessment principles when considering any application for a Northwest Runway at Heathrow Airport. Please tell us your views.

Historic England endorses the Government's approach that all proposals to address airport capacity are subject to the EU Impact Assessment Directive, and the need for an Environmental Impact Assessment. We particularly welcome the requirement for 'good design' for airport infrastructures (Draft Airports NPS paragraphs 4.29-4.35), although for the avoidance of doubt it would be helpful if historic environment considerations could be made explicitly part of the 'good design' principles, such as by mentioning it as an example in paragraph 4.31 – '*... for example in relation to safety or the historic and natural environment.*'

Historic England can provide advice and examples of other 'best practice' schemes that can be used to inform the development of sensitive scheme designs. A collaborative approach where heritage expertise from Historic England can help inform design decisions would help address Government's aspirations to optimise potential benefits and minimise potential adverse impacts.

In addition to a review of nationally and locally designated heritage assets and other heritage assets identified on Historic Environment Records, Historic England encourages the application of urban and rural historic characterisation to help understand wider impacts. Direct and indirect effects of the scheme on the setting of heritage assets (including noise impacts) will also need to be considered together with the application of more detailed investigation, where appropriate. The adoption of such an approach, confirmed in the Draft Airports NPS and AoS will ensure the impacts on the historic environment are fully understood, thereby informing the detailed mitigation strategy and supporting programme of enhancement measures.

Question 4: The Government has set out its approach to surface access for a Heathrow Northwest Runway scheme. Please tell us your views.

We support the Government's objective of high-quality, efficient and reliable surface access that minimises environmental impacts (paragraph 5.5). Historic England expects the same level of rigour to be applied to the potential impact of surface access arrangements on the significance

of heritage assets as that expected for the Northwest Runway Heathrow expansion itself. It is not currently clear in the AoS (and supporting appendices) which designated heritage are going to be affected by the surface access arrangements and we would ask that this is clarified. The AoS implies that the surface access arrangements could threaten the Great Barn at Harmondsworth. Historic England would strongly oppose any proposal to demolish or relocate this important building.

Question 5: The draft Airports National Policy Statement sets out a package of supporting measures to mitigate negative impacts of a Heathrow Northwest Runway scheme. Please tell us your views. Are there any other supporting measures that should be set out? In particular, please tell us your views on:

5.1. Air quality supporting measures

5.2. Noise supporting measures

5.3. Carbon emissions supporting measures

5.4. Compensation for local communities

Historic England supports the general approach of the Draft Airports NPS, and in particular we welcome the references made to our guidance on *The Setting of Heritage Assets* and the *Aviation Noise Metric* (paragraph 5.183). We also welcome the need for applicants to prepare proposals which can make a positive contribution to the local historic environment (paragraph 5.184). These measures, however, would not relieve an applicant of their first responsibility to avoid or minimise harm to heritage assets.

Many of the homes and places affected by the Northwest Runway Heathrow option are of heritage interest, and would need careful consideration and specialist heritage advice when developing tailored compensatory measures. For example, the introduction of noise insulation in a listed building would need to be informed by the significance of the heritage asset. Noise impacts may also undermine the viability of historic buildings which contribute the cherished local scene that is important to local communities. The cost of non-standard noise insulation and the need to find viable new uses for buildings affected by noise should be taken into account when considering compensation for local communities.

Question 6: The Government has set out a number of planning requirements that a Heathrow Northwest Runway scheme must meet in order to operate. Please tell us your views. Are there any other requirements the Government should set out?

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 5.194 to ensure Government deals with the issue consistently.

Question 7: The Appraisal of Sustainability sets out the Government's assessment of the Heathrow Northwest Runway scheme, and considers alternatives. Please tell us your views.

In our view, in general the AoS provides a useful, but limited framework in which to assess the impact of the Draft Airports NPS upon heritage issues. Areas of concern which are still outstanding and which have been consistently raised through our engagement on the Steering

Group and in response to the Statutory Environmental Bodies Consultation on the Scoping Report are:

- the focus on quantitative rather than qualitative assessment of heritage assets and the wider historic environment. This includes ensuring consistency and accuracy in details of heritage assets affected in each study area, as well as surface access areas, throughout the AoS;
- the suggestion of generic mitigation measures which are not sufficiently tailored to the significance of heritage assets that are likely to be harmed and the inadequacy of the promoters mitigation measures which fails to meet the requirements of national policy;
- the consideration of non-designated assets only in the Land Take and the Intermediate Study areas, and not assessed in the Outer Study Area;
- the limited information on the potential impact of surface access arrangements on the historic environment; and
- the lack of consideration given to the heritage significance of the wider landscape character with the emphasis very much on protected landscapes, the natural environment and tranquillity.

Further detailed comments on the Appraisal of Sustainability are set out in Appendix B.

Conclusion

On the basis of the information available, it remains the case that the Heathrow Northwest Runway proposal is likely to be substantially more harmful to historic environment than a second runway at Gatwick or an Extended Northern Runway at Heathrow. It is therefore imperative that, should the Northwest Runway proposal at Heathrow be taken forward, the following issues are addressed:

- harm to the area's heritage must be minimised, and where damage or loss cannot be avoided it must be robustly justified. Such justification will need to be supplemented by a detailed programme of enhancement measures of benefit to the local historic environment;
- for highly important heritage assets such as the Grade 1 Harmondsworth Great Barn and Grade II* Church of St Mary Harmondsworth, clear shared understanding of their context and setting is essential, so that the proposal and its associated developments such as surface access arrangements, do not compound the harm caused by the runway itself, but help ensure their continued appreciation and viability;
- a detailed mitigation strategy must include, amongst other things, sensitive design approaches that respond to the significance of heritage assets, such as innovative noise alleviation measures for the Great Barn, and landscaping details that do not diminish the historic character of the area yet provide screening and noise management of the airport and its operations; and
- the recording of heritage assets that are to be lost (wholly or in part) must be shaped by a research strategy that involves appropriate levels of public access, engagement and interpretation.

We welcome the opportunity for continued active engagement on this nationally important infrastructure project by working with the relevant Government Departments, scheme promoter(s) and other stakeholders.

Yours faithfully,

A handwritten signature in black ink, appearing to read "Andrew Brown". The signature is fluid and cursive, with a long horizontal stroke at the end.

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Appendix A

Draft Airports National Policy Statement (February 2017) Historic England detailed comments

Paragraph 5.184

In order to provide greater clarity, to ensure all forms of enhancement measures and all heritage assets that are could be at risk including those not on the Historic England Register are considered, we advise that the following changes to the paragraph are made:

The applicant is encouraged... This can include, where possible:

- *Enhancing, through a range of measures such as sensitive design, the significance of heritage assets or setting affected;*
- *Considering measures that address those heritage assets that are at risk ~~which are on the h~~Heritage at ~~r~~Risk Register, or which may become at risk, as a result of the scheme; and*
- *Considering how visual or noise impacts can affect heritage assets, and whether there may be opportunities to enhance access to or interpretation, understanding and appreciation of the heritage assets affected by the scheme.*

Paragraph 5.188

We do not understand the wording at the end of the paragraph which is not included in the *National Policy Statement for National Networks* and suggest it is deleted: 'and the significance of heritage assets'.

Paragraph 5.196

Overall paragraph 5.136 of *The National Policy Statement for National Networks* contains similar wording to that contained in the *Draft Airports NPS*. However, there a couple of changes in individual words where it does not align and we suggest the following changes 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.'

Current omission

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 in 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.

Appendix B

Appraisal of Sustainability for the Draft Airports National Policy Statement (February 2017) **Historic England detailed comments**

Our detailed comments relate to both the main report and the relevant appendices. These are *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 these 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 38). For consistency with the remainder of the document and particularly the appraisal questions, we would suggest 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 works or indirectly during the construction and operation of proposals, e.g. through surface transport or aviation noise.
- Effects on the 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 44 and *Appendix A-11*), we 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?*’

Table 4-2 Landscape (page 44). We advise appraisal question 36 is amended to include ‘*sensitive views and settings*’ to ensure consistency with page 68 and that question 35 is revised so that its focus is not purely on ‘*designated landscape, townscape and waterscape*’.

Table 6-1 Historic Environment (page 68). For consistency elsewhere, objective 17 should read ‘*enhance heritage assets and the wider historic environment*’ and for question 31 delete ‘heritage’ from ‘the heritage significance’. Under the landscape topic please refer to our comments above.

Paragraph 6.4. Please refer to our comments on *Appendix A-2 Quality of Life* below.

Paragraph 6.12. Please note the paragraph numbering has gone awry which makes referencing difficult. Regardless of this, the figures related to the number of heritage assets potentially captured by the study areas need to be carefully reviewed with those provided in the *Historic Environment Appendix A-11*. In the main report for paragraph 6.12.6 we are not clear what the

247 figure is based on, as the total for LHR-NWR appears to be 241 and potentially 249 with surface access corridors. Or does the figure 247 include some of the heritage assets identified in the surface access corridors? A similar issue arises in paragraph 6.12.3 (at the bottom of page 92) where 27 heritage assets are potentially affected, yet this does not tally with the 21 in the Land Take and 8 identified in the surface access arrangements elsewhere in the AoS. The figures given in paragraph 6.12.4 include both the Land Take and Intermediate Study Area, and for LGW-2R there are 13 not 12 archaeological notification areas. Further comments are given on the *Historic Environment Appendix A-11* below.

Paragraph 6.13. Please refer to our comments below on the *Landscape Appendix A-12*

Paragraph 7.4.110. As discussed above, there is a lack of clarity on the number of designated assets that could be impacted and recommend the following is added at the end of the penultimate sentence in paragraph 7.4.114: 'through the use of rural and urban historic characterisation studies, for example'. Further comments are given on the *Historic Environment Appendix A-11* below.

Paragraphs 7.4.115 – 7.4.119. Please see our comments below on the *Landscape Appendix A-12*

Table 7-3 Historic Environment (pages 139-140). The mitigation measures reproduced from the ACs reports in Table 7-3 differ from those given in the *Historic Environment Appendix A-11* (paragraph 11.7.4), and it is of concern that the inadequacies of these proposals and their failure to meet the requirements of national policy has not been highlighted. At the end of the final paragraph on page 139 it might also be helpful to reference the role of rural and urban historic characterisation studies. After the first bullet on page 140 and to align with the *Historic Environment Appendix A-11* (paragraph 11.10.7), we would suggest 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'. Under the third bullet point there may be opportunities for relocating buildings together with other heritage assets to sites other than museums, we question the term *'preservation by record'* and would wish to see entries on the National Heritage List for England reviewed/updated as part of the assessment exercise and not simply for those designated heritage assets that are to be lost. These points and additional comments are discussed further in our response to the *Historic Environment Appendix A-11*.

Table 7-3 Landscape (page 141) – 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 147) – 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. We also suggest that all key decision-makers and interested parties are involved in the process of monitoring as well as the applicant.

Table 7-4 Landscape (page 147) – As mentioned above, concerns remain over the emphasis on designated landscapes. It would again be helpful to add the following to the list headed *'Proposed Monitoring'*: to monitor/review off-site mitigation/enhancement strategy and its implementation. We also suggest that all key decision-makers and interested parties are involved in the process of monitoring as well as the applicant.

Appendix A-11 Historic Environment

Paragraph 11.1.5. We would advise that AoS Question 34 is amended to read, ‘Will its construction and operation lead to ...’ to ensure consistency with the main AoS report (Table 4-2 page 44 and Table 6-1 page 68).

Paragraph 11.6.6. Revise as follows to ensure impacts on the wider historic environment are fully understood: ‘*Detailed studies based on guidance provided in ‘The Setting of Heritage Assets’ together with rural and urban historic characterisation studies, will be undertaken at Environmental Impact Assessment (EIA) stage to understand the wider landscape characteristics and visual significance’.*

Table 11.4. Some of the numbering appears to be incorrect, with 2 not 6 scheduled monuments in the intermediate area for LGW-2R, and 6 not 5 conservation areas in the LHR-ENR outer area.

Paragraph 11.8.6. The approach should be in line, not likely, to be in line with best practice – second sentence.

Paragraphs 11.9.3, 11.9.10 and 11.9.17. We assume this is a matter of terminology and that you are referring to all non-designated heritage assets identified from the HER search, and not simply ‘archaeological remains’?

Paragraphs 11.9.5-7, 11.9.12-14, 11.9.19-21. The impact of noise upon the significance of heritage assets, such as the Grade 1 Great Barn at Harmondsworth is important to consider thoroughly. However the details provided focus on the number of designated heritage assets that maybe impacted and does not provide any qualitative understanding of impact in the context of the scenarios described. Further information and understanding is needed.

Paragraphs 11.9.4, 11.9.11, 11.9.18 consider surface access corridors, but as described above, at a strategic level insufficient information is available on surface access arrangements, to consider potential heritage impacts and it is not clear what heritage assets are likely to be affected. This lack of clarity provides uncertainty on how many, and what heritage assets could be potentially harmed. This is particularly important when trying to assess the overall impact of the scheme, and the developments that are needed in association with delivering a new runway and expanded airport capacity.

Objective 17 (page 20). Suggest revising the wording to ensure consistency with the remainder of the document so that it reads: ‘*Conserve and where appropriate enhance heritage assets and the wider historic environment including buildings, structures, landscapes, townscapes and archaeological remains’.*

Question 31 (page 20). Given that surface access corridors are included, it would be useful to get clarification of how the numbers of heritage assets were identified and collated, so avoiding potential duplication of figures/assets.

Question 34 (page 26). This needs to be amended in line with our comment above: *'Will its construction and operation lead to ...'*. Under the *'Description of Impact'*, the potential of possible noise impacts in the table appears to be downplayed when considered against light impacts. In addition it should be made clear that the final sentence only refers to non-designated assets.

Reflecting our comments to the main report Table 4-2 Historic Environment (Cultural Heritage) (page 44) 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 loss as described in paragraph 11.10.14. We would suggest that this section should be further strengthened by adding the following at the end of the final sentence *'and to undertake rural and urban historic characterisation studies'*.

Paragraph 11.10.10. We suggest the language in this paragraph should be more closely aligned with the *National Planning Policy Framework* (see chapter 12), whereas the meaning of the last sentence is not entirely clear, and it might be better to state that the settings of all heritage assets will be considered.

Paragraph 11.10.14 and 11.10.15. There may be opportunities for relocating buildings together with other heritage assets to sites other than museums (informed by appropriate recording), and we question the term *'preservation by record'* which is not in line with best practice. Similar language is used in paragraph 11.10.15 and again this needs to be revised in accordance with the *National Planning Policy Framework*. It is suggested that all work should be carried out in accordance with recognised standards and guidance informed by a research strategy, and it is worth recalling the archaeological programme for Terminal 5, where a detailed archaeological deposit model was produced at the start, as the basis for a strongly driven research programme. Historic England would seek to ensure this and similar approaches form part of a wider detailed mitigation and enhancement strategy.

Conclusions (pages 32-34). As previously raised we would seek clarification in the figures provided in paragraphs 11.12.4, and 11.12.7. Do they include surface access corridors and, if so, which assets are specially affected as opposed to those that may fall within the Land Take or Intermediate and Outer Study Areas? For LGW-2R, 13 not 12 archaeological notification areas are present in paragraph 11.12.8 and these figures only include the Land Take and Intermediate Study Areas – no HER search was carried out for the Outer Study Area.

For paragraph 11.12.13, it is suggested the wording is further strengthened by amending the penultimate sentence as follows: *'In addition it is important to consider possible impacts (including cumulative) on the wider historic environment in order to move away from an assessment simply based on individual heritage assets through the use of rural and urban historic characterisation studies, for example.'*

Appendix A-12 Landscape

Overall, we welcome the references to the historic environment in the landscape appendix (especially paragraphs 12.6.4, 12.6.5, 12.8.5, 12.10.7, 12.10.9, 12.12.26). However, we are 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 31. As mentioned in response to the main report we would advise that appraisal question 35 is revised so that its focus is not purely on 'designated landscape, townscape and waterscape'.

Paragraph 12.1.5 and page 33. We would advise appraisal question 36 is amended to include '*sensitive views and settings*' to ensure constancy with the main *AoS Report* (page 68).

Paragraph 12.2.5. Whilst acknowledging the important role of Natural England in relation to the ELC, we are surprised there is no mention of Historic England. This omission highlights the emphasis on the natural environment in the landscape appendix.

Paragraphs 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 12.6.5. We would suggest that the paragraph is amended as follows to support the reference to historic interest in landscape and townscape from the previous paragraph: '*Detailed studies based on guidance provided in 'The Setting of Heritage Assets' together with rural and urban historic characterisation studies, are necessary at EIA stage to understand the wider landscape characteristics and visual significance*'.

Paragraph 12.7. We are concerned that the sources of information cited in 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 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 provide in *Appendix A-11* (paragraph 11.7.5) is included here.

Paragraph 12.8.5. This is inconsistent with paragraph 11.8.5 in the *Historic Environment Appendix A-11* and needs to be amended as follows: '*Detailed assessment of the proposed schemes on the significance of heritage assets should be undertaken at the EIA stage.....*'. We would also suggest that the final sentence is further strengthened as follows: '*During EIA, site specific surveys can be undertaken together with rural and urban historic characterisation studies, and more detailed information regarding design will be available for assessment*'.

Paragraph 12.10.9. The proposed landscape strategy, together with the strategy for the historic environment, should also consider possible impacts (including cumulative), together with mitigation for the wider historic environment with reference to historic characterisation. We would also suggest that the paragraph is further strengthened and aligned with the *Historic Environment Appendix A-11* by adding the following: '*Mitigation measures that should be considered include those that address heritage at risk (including those that become at risk as a*

result of the preferred option), enhancement to conservation areas, improving the setting of assets, mitigation of noise impacts, together with opportunities for community engagement, which could include improved access to and/or interpretation, understanding and appreciation of heritage assets. Adopting the use of green space in areas of high or known archaeological potential will also contribute to enhancement’.

Paragraph 12.10.10. As above, this paragraph needs to be amended to ensure consistency with paragraph 11.8.5 of the *Historic Environment Appendix A-11* by removing the word ‘selected’ from ‘*the setting of selected heritage assets*’.

Paragraph 12.12.26. It is suggested the final sentence is further strengthened as follows: ‘*During EIA, site specific surveys can be undertaken together with rural and urban historic characterisation studies, when more detailed design information will be available for assessment*’. In addition, some of our concerns over the inherent bias in the appendix could be overcome by including the following text: ‘*Following detailed mitigation, positive impacts could be realised by addressing heritage at risk (including those that become at risk as a result of the preferred option), enhancement to conservation areas, improving the setting of assets, mitigating noise impacts, together with opportunities for community engagement, which could include improved access to and/or interpretation, understanding and appreciation of heritage assets. Adopting the use of green space in areas of high or known archaeological potential will also contribute to enhancement*’.

Appendix A-2 Quality of Life

Overall we welcome the inclusion of access to cultural heritage (in conjunction with nature) as an appraisal of sustainability quality of life indicator. However, we would suggest this approach needs further strengthening and clarification.

A fundamental concern is how the historic environment (and cultural heritage) is expressed in this appendix. Essentially it is not sufficiently expressed as a separate issue for robust consideration which reflects the limitations of *Appendix A-12 Landscape*, where the emphasis appears to focus on the natural environment, with little reference to the historic environment. For example, Table 2.3 (page 9) under the heading ‘*Measures of National Well Being*’, provides misleading understanding of the associated indicator and masks the inclusion of historic environment. To help address this point we would advise replacing ‘*the natural environment*’ with ‘*the environment*’ (see also pages 65 and 66). Similar issues can be found in Table 2.44 (page 20) and where historic environment issues are considered, this is only done in quantitative terms (paragraphs 1.9.32, 1.9.69 and 1.9.105). Furthermore, 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.

There are no direct references to the historic environment under objective 3 question five (page 45 onwards) 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 66). We note the reference to *Appendix A-11 Historic Environment* under Mitigation Measures (paragraph 1.10.1) and the cultural heritage in paragraphs 1.12.3, 1.12.9 and 1.12.15, but as with LGW-2R cumulative impacts also need to be recognised for LHR-ENR and LHR-NWR.

For Historic England, given the damaging impacts all three options are likely to have on the historic environment, it is vitally important that these are accompanied by a robust programme of mitigation and enhancement measures as set out in the in the *Draft Airports NPS* and *AoS*, and subject to our further comments above. For the latter, this is likely to include measures that address heritage at risk (including those that become at risk as a result of the preferred option), enhancement to conservation areas, improving the setting of assets, mitigating noise impacts and community engagement, including improved access to/or interpretation, understanding and appreciation of heritage assets. Adopting the use of green space in areas of high or known archaeological potential will also contribute to enhancement.

In conclusion, we would advise that *Appendix A-2* needs to be robustly reviewed so that the impacts upon the historic environment in the context of Quality of Life issues is clearly defined and understood, and then used to inform the development of a detailed mitigation and enhancement strategy for the preferred option.