



Historic England

23 May 2017

Department for Transport 2017 UK Airspace Policy: A Framework for Balanced Decisions on the Design and Use of Airspace Consultation

Historic England Response

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.

The majority of the consultation questions lie beyond the scope of Historic England's remit and expertise, and our response therefore focuses on Questions 2a and 5. It should also be noted this has been prepared in parallel with our submission to the consultation on the *Draft Airports National Policy Statement: New Runway Capacity and Infrastructure at Airports in the South East of England*.

Q 2 (a) Assessing Noise in Airspace Decisions – The proposal for assessing the impacts of noise, including on health and quality of life. Please provide any comments on the proposed metrics and process, including details provided in the draft guidance.

Q 5 Guidance – Please provide any comments on the draft *Air Navigation Guidance: Guidance on Airspace & Noise Management and Environmental Objectives* published alongside this consultation.

General Comments

Historic England is pleased to note that one of the key objectives in the *Air Navigation Guidance* is to 'Emphasise the need that the environmental impact of aviation must be mitigated as much as practicable and realistic to do so, within the context of a balanced decision-making framework' (page six). We also welcome the reference to the *National Planning Policy Framework* (NPPF) and associated guidance, which sets out the Government's planning policies for England and how these are expected to be applied, and which the Civil Aviation Authority (CAA) should be familiar with (paragraph 3.39). In order to achieve sustainable development the *NPPF* states that the planning system needs to perform an economic, social and environmental role, with the latter contributing to the

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protection and enhancement of the natural, built and historic environment (re: paragraphs seven - nine).

However, with the exception of avoiding National Parks and Areas of Outstanding Natural Beauty (wherever possible) and references to WebTAG, there is little consideration in the guidance of how the potential impact of aviation noise on the environment (including the historic environment) should be considered and assessed. Furthermore, this absence of information may have implications on the robustness of the environmental statement which the Civil Aviation Authority (CAA) is required to produce when approving an airspace change, 'which should verify that all environmental factors have been considered in line with relevant Government policy and explain why the CAA agrees that these have been balanced appropriately' (page 25).

To overcome this deficiency, **we suggest the *Air Navigation Guidance* should explicitly reference the need to assess the possible impacts of aviation noise on the environment (including historic environment), to avoid or minimise such impacts, where it is practicable and realistic to do so, and in those instances where harm cannot be avoided to implement proportionate mitigation measures. Such a statement could usefully be included in paragraph 3.27.**

Impacts on the Historic Environment

Aviation noise can impact on the historic environment in the three ways: disrupting the fabric of the heritage asset (i.e. physical damage), disturbing people using the heritage asset, and altering the character and setting of a heritage asset so its significance is affected. Although noise impacts on the physical structure of heritage assets is unlikely, resonance induced vibration might intensify the impacts on persons using the asset.

Intrusive noise (including that from aviation sources) has the potential to adversely affect the setting and significance of heritage assets and, may in some circumstances, affect their viability. Conversely, the absence or restriction of noise and the presence of positive sounds can improve and enhance the setting and significance of heritage assets. For example, churches and churchyards, historic parks and gardens, ruined buildings and prehistoric burial sites can have a distinct sense of place which is at least partially the result of the absence, or at least the recession, of the invasive sounds of modern day-to-day life. For other heritage assets, the existing soundscape does not contribute to their significance, and therefore does not require specific consideration.

This is recognised in the Government's *National Planning Policy Framework*, which defines the setting of a heritage asset as 'the surroundings in which the asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of the asset, may

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affect the ability to appreciate that significance or may be neutral'. The *National Planning Policy Guidance* provides supporting and expanded guidance relating to the *NPPF* and defines the setting of a heritage asset as including non-visual elements: 'Although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise ...'

These issues are touched on in the *Air Navigation Guidance* in paragraphs 3.27 when discussing 'nominated quiet areas, or noise sensitive buildings that it is practical to avoid overflying', and 4.19 which considers the desirability of minimising noise impacts for noise sensitive buildings, such as hospitals and places of religious worship. However, in light of our comments above, **we suggest paragraph 4.19 is revised to include 'Noise Sensitive Buildings and Sites' with particular reference to the environment (including the historic environment).**

Assessing Aviation Noise Impacts on the Setting of Heritage Assets

Given the absence of any established method or metrics for assessing the impact of noise on the setting of heritage assets, the limitations of existing tranquillity models, and in response to the work of the Airports Commission, we appointed consultants to undertake further research and put forward a methodology.

This can be found in the *Aviation Noise Metric – Research on the Potential Noise Impacts on the Historic Environment by Proposals for Airport Expansion in England* (Temple Group Limited and Cotswold Archaeology 2014). The methodology is based on noise contours and noise information, scoping (to identify those heritage assets with the potential for noise impact), an understanding of the sensitivity of the asset to changes in the sound environment, and detailed assessment to determine whether the impacts of aviation noise, or any changes in aviation noise, are likely to be harmful, neutral or beneficial. Such information can then help to look at ways of avoiding or minimising possible harm together with the need for mitigation, where appropriate. One important finding from the research is that there is no attributable correlation between a heritage asset's sensitivity to noise and its designation or status, as this is dependent on the relationship between the asset and the surrounding soundscape. A copy of the report can be found here: <https://historicengland.org.uk/images-books/publications/aviation-noise-metric/>.

The operation and active management of aviation movement and the resulting noise generated can help to alleviate or cause harm to heritage assets. For example, if routes are concentrated in specific areas and the number of plane movements is intensified, then the impact on heritage assets in these areas could potentially be greater. In addition, the use of technology to allow more tailored and controlled flight paths could help to avoid and mitigate possible harm to heritage assets, and by identifying the location, significance and

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sensitivity of heritage assets to the sound environment, it may be possible to use technology to avoid and reduce harm.

The potential value of the methodology has been recognised in the Department for Transport's *Draft Airports National Policy Statement: New Runway Capacity and Infrastructure at Airports in the South East of England* (February 2017), where paragraph 5.183 states: 'Detailed studies will be required on those heritage assets affected by noise, light and indirect impacts based on the guidance provided in *The Setting of Heritage Assets* and the *Aviation Noise Metric*'. It is also referenced in the Department for Transport *Appraisal of Sustainability: Draft Airports National Policy Statement Appendix A-11 Historic Environment* (February 2017), so that possible noise impacts from the Government's preferred option (Heathrow North West Runway) on heritage assets can be understood in order to avoid, minimise or mitigate harm.

We therefore suggest that the *Air Navigation Guidance* should also reference and promote the methodology put forward in the *Aviation Noise Metric – Research on the Potential Noise Impacts on the Historic Environment by Proposals for Airport Expansion in England*. This might be appropriate under 'Other relevant legislation, policy and guidance' (page 27), where an additional paragraph could highlight the importance of advice and guidance prepared by other bodies, which the CAA should be familiar with, promote to sponsors and ensure it has been taken into account when preparing the environmental statement.

Finally, the importance of best practice guidance on noise issues is noted on several occasions in the *Air Navigation Guidance* with regard to the proposed Independent Commission on Civil Aviation Noise. **Should this be taken forward, we ask that the Commission further promote the methodology put forward in the *Aviation Noise Metric – Research on the Potential Noise Impacts on the Historic Environment by Proposals for Airport Expansion in England***, and Historic England is willing to work with both the Commission and CAA in developing this further.

We trust this response is helpful and are willing to discuss its content in more detail with the Department for Transport if that would be useful.

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