



HM Government 2017 *Beyond the Horizon: The Future of UK Aviation. A Call for Evidence on a New Strategy*

Historic England Response 05 September 2017

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 Digital, 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 questions in this call for evidence lie beyond the scope of Historic England's remit and expertise, and our response therefore focuses on Questions 5, 8, 9, 10 and 11.

Q 5 What are your views on the proposed aim and objectives?

Q 8 What are your views on the government's proposal to support airports throughout the UK making the best use of their existing runways, subject to environmental issues being addressed?

Q 9 Are there any other specific questions on the six objectives that you think should be included in the planned consultations?

Considering Environmental Impacts

Whilst Historic England welcome's the objective in chapter seven to 'supporting growth while tackling environmental impacts', the emphasis here is very much on those impacts associated with noise, air quality and carbon emissions, which is then reflected in the questions under this section. In order to ensure a balanced approach, we suggest the strategy also needs to consider other environmental issues, including the protection and enhancement of the natural, built and historic environment. This would accord with the policy principles set out in the government's *National Planning Policy Framework* (NPPF) and associated guidance, and how these are expected to be applied in order to achieve sustainable development (re: paragraphs seven - nine).

Similarly, with respect to question nine, it would be helpful for the strategy to explore how detrimental impacts arising from aviation on the environment (including historic environment) could be avoided, minimised or mitigated, whilst seeking enhancement opportunities (page 62).

Q 10 Are there any other sources of information or evidence that the government should bear in mind when developing the strategy?

Q 11 If yes, please give us some details of the sources of information or evidence.

Aviation Noise Impacts on Heritage Assets

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 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 ...'

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 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 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



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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.

These points have also been raised in our response to the *UK Airspace Policy: A Framework for Balanced Decisions on the Design and Use of Airspace Consultation* (Department for Transport 2017). We trust this response is helpful and look forward to working with government in developing the Aviation Strategy.

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