



Historic England

Our ref: ADMO5939

Heathrow Airport Limited
Compass Centre
Nelson Road
Hounslow TW6 2GW

By email: feedback@heathrowconsultation.com

13 September 2019

Dear Sir/Madam

Heathrow Airport Expansion Consultation – Summer 2019

Thank you for the opportunity to comment on the Preferred Masterplan for the expansion of the airport, together with the suite of documents that underpin the proposals. As the Government's statutory adviser, Historic England is keen to ensure that the conservation and enhancement of the historic environment is fully taken into account at all stages of the planning process. Given the now well-understood impacts of the proposed new runway and associated infrastructure, it is critical that these are properly assessed as part of the decision-making process and appropriate measures put in place to address them in order to comply with the requirements of the Airports National Policy Statement (ANPS).

Given the new detail available as part of the consultation, we now believe the project would result in the total loss of the Longford conservation area, around 60 per cent of the Harmondsworth conservation area and a further 19 listed buildings. In addition, over 200 other designated heritage assets in the area around the airport will be significantly affected by impacts on their setting through noise or visual effects, including the Grade I listed Great Barn and Grade II* Church of St Mary in Harmondsworth. The Heathrow plateau and adjacent Colne Valley are also areas of well-known archaeological interest with numerous investigations taking place throughout the twentieth century demonstrating high potential for new discoveries. Known heritage assets include a major Neolithic ceremonial complex, one of the earliest extensive organised field systems in England (Bronze Age), a unique Iron Age shrine and later Iron Age, Roman and early medieval settlements and fields. The latter are precursors of the villages which still exist in the area and include many important historic buildings. As we have made clear throughout the process, the proposed location of the new north-west runway would be the most damaging in historic environment terms of all the options considered.



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Given these impacts, together with our ongoing engagement and discussions with Heathrow Airport Ltd (HAL) and their consultants since the beginning of the project, we are disappointed that there has been very little in the way of modifications since the last public consultation. Our primary concern is therefore that the Preferred Masterplan, the mitigation and compensation measures together with the Environmental Impact Assessment and its outputs are fit-for-purpose in terms of understanding the effects and their level of impact and are therefore able to play a meaningful role in the decision-making process. At present, we do not feel confident that the Preliminary Environmental Information Report (PEIR) satisfies the requirements of the ANPS in terms of the historic environment.

Our detailed comments in relation to the preferred masterplan and the various consultation documents are set out below. However, to aid clarity in future discussions we consider there are three critical over-arching issues that will need to be resolved if Historic England is not to object to HAL's Development Consent Order (DCO) application:

- The lack of a credible, coherent and ambitious place-making strategy for the future of Harmondsworth village and the wider area, including the Great Barn and St Mary's Church
- The potential non-compliance of the proposed archaeological strategy with the ANPS
- The absence of consideration of the impacts of demolition in Longford and other historic locations as part of the proposals for mitigation and compensation

Overarching comments

We welcome and note the objectives set out by HAL for the expansion of the airport in terms of its effects on neighbouring areas, designing distinctive places and creating benefits for existing communities (section 4.5 of the Preferred Masterplan). We would note however that there remains a significant level of detail to be clarified in relation to the expansion plans, both in terms of the strategic measures to mitigate the impacts on the historic environment and the specific proposals in and around historic settlements and individual heritage assets. For example, the proposed landscape strategy has the potential to have significant effects on the setting of heritage assets while also offering an effective mechanism to address other impacts, yet at this stage there is very little detail available as to how it will be taken forward. We would stress that the gap between the aspirational and outline tone of much of the consultation documentation as opposed to the final level of detail that will be needed at the point of application reinforces the need for further meaningful engagement and consultation between HAL, the consultant team and all external stakeholders between now and summer 2020.



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The presence of the existing airport creates pressures on the surrounding settlements, landscapes and communities through the necessary associated infrastructure, the intensity of land use and scale of traffic. This will only increase in the event of a new runway, creating further pressure and potential degradation of the landscape and environment. We are concerned that the preferred masterplan and related proposals present a potentially fragmented approach to dealing with these pressures, including those that will inevitably come to bear on the historic environment, when what is required is an integrated and durable strategy that will not only address them but also constitute a long-term commitment to managing and conserving the quality of the built and historic environment.

Preliminary Environmental Information Report (PEIR)

We acknowledge the status of the PEIR as an interim step in assessing the likely environmental effects of the overall project. However, the lack of detail in significant areas of the PEIR also restricts our ability to accurately understand the degree of impact of the various effects on the historic environment and offer detailed advice as a result. We would also suggest that this increases the risk that the assessment itself may be non-comprehensive and fail to fully capture the likely effects.

In this respect, we have significant concerns over the exclusion of the existing conservation areas that surround the airport (particularly Harmondsworth) from the boundary of the DCO. We note the proposals for some of the historic settlements as part of the expansion plans, but would welcome clarification as to how and when these will be delivered if they are not included as part of the DCO application in 2020. In order to ensure that neighbouring communities see the benefits that HAL have indicated should come about as part of the expansion plans, all mitigation measures should be tied to the DCO, not least given the commitments throughout the consultation documents that the DCO itself will '*include all parts that are necessary to achieve, operate, maintain and mitigate the effects of that increase in capacity*' (see for example PEIR Non-Technical Summary, section 1.3).

Harmondsworth is particularly important with regard to mitigation measures, given its sensitivity as a historic settlement, including its listed buildings. Other than Longford, the village is likely to experience the greatest degree of impact as a result of the new runway, given the necessary demolition, noise, visual effects and proximity of extra flights, together with new boundary treatments and the realignment of the A4 immediately to the north. The disappearance of the A3044 also presents a challenge as it would leave only one access road in and out of the village.

The village will be reduced by about two-thirds in both terms of its built environment and population, although as has been stated in previous consultations what would remain would



still contain highly significant parts of the wider area's heritage, including the historic core of the village and a number of important listed buildings, such as the Grade I Great Barn and the Grade II* Church of St Mary's. While we note the proposals for a new visitor centre and the creation of a country park, at this stage we do not consider they constitute a realistic strategy for ensuring the long-term viability of the village as a residential community. We are not aware of any data, evidence or business plan underpinning this approach, while we are similarly unaware of any discussions with key stakeholders (such as the English Heritage Trust as guardians of the Barn or the Diocese of London in relation to St Mary's Church) as to how key buildings could be adapted and repurposed.

As such, we are not currently persuaded that the consultation documentation contains proposals that would adequately address the impacts on Harmondsworth or secure the optimum viable use for either the Barn or St Mary's Church. We would wish to avoid a scenario where a new use that requires adaptation to the historic fabric (with potential consequent impact on significance) subsequently fails. This could then bring about a cycle of neglect and inappropriate intervention.

We note and acknowledge the difficulties associated with any strategy to create a long-term successful future for the village, given its encirclement by the runway and new infrastructure and consequent limited access to the historic core. Nevertheless, we do not consider the proposals as set out are ambitious enough to sustain the economic life of the village or that its historic environment is not at risk of neglect and decay as a result. We are clear that a more proactive and place-making approach, potentially using the opportunities afforded by what is defined as associated development by the 2008 Planning Act to help address the effects of infrastructure projects, is necessary to give all stakeholders the confidence that Harmondsworth can survive as a residential and characterful community.

We would also wish to point out the importance of considering all the potential effects of the airport expansion in their totality. We note that the assessment of noise effects on the historic environment has yet to be undertaken, and as such do not play a part in section 13.10 of the PEIR. While we do not disagree with the individual assessments so far (in both terms of types of effect and particular assets) we believe that the cumulative effects of visual, physical and particularly noise effects on the historic environment of Harmondsworth will not be adequately reflected if this approach is taken forward into the Environmental Statement. We note para 4.15 of the ANPS which indicates that the EIA process should consider the interrelationship between effects rather than consider each in isolation. We would also point out Planning Inspectorate Advice Note 17 Cumulative Effects Assessment (which can be found [here](#)) recognises that NSIPs may often comprise multiple effects, and that their interaction should form part of the assessment. As above, we consider the initial individual assessments to be adequate, but believe that the overall process would be

strengthened by a recognition that the combined effects on Harmondsworth (and potentially other conservation areas) present a different long-term issue to the individual impacts.

We also note the limited nature of the proposed assessment of noise effects on the historic environment, which would restrict any assessment in the eastern and western study areas to solely registered parks and gardens. While we acknowledge that including every designated asset in the noise assessment could potentially create an unnecessarily unwieldy project that would be overly complex, we do not consider the proposed approach complies with the requirements of the ANPS and would risk an inaccurate assessment of the likely effects of the new runway on the historic environment. We consider this should be amended.

In addition to our reservations with regard to the exclusion of Harmondsworth and the other conservation areas from the DCO boundary, we are concerned with the absence of detailed consideration of the impacts of the demolition of various designated heritage assets across the consultation documentation. The demolition of an entire conservation area, two-thirds of another and a further 19 designated assets is unprecedented in terms of potential impacts of a development scheme. We note that the only discussion of such demolition is in relation to three listed buildings in Longford and potential relocation, although the logic behind their selection (and not others scheduled for demolition) is not explicit. We would expect the forthcoming Heritage Management Strategy to include full detail on all assets likely to be demolished or significantly affected and to examine potential alternatives.

We note that the PEIR does not indicate an approach to identifying and subsequently managing any archaeological remains that meet the criteria of para 5.191 of the ANPS. Furthermore, we are given to understand that only extremely limited field evaluation has either been undertaken or will be take place before the DCO application is submitted. Given that area in question is identified as subject to significant harm and well-known from previous studies for its archaeological potential, we consider these two issues create cause for concern, given the requirements of para 5.193 of the ANPS, which requires '*where necessary*' field evaluation. Given the archaeological potential of the area, we believe field evaluation absolutely must be carried out to comply with the ANPS. Without it, there is a high risk that consent could be granted for development that would harm or destroy heritage assets of archaeological interest equivalent to a scheduled monument with the necessary proper consideration.

Detailed comments in relation to each of the relevant consultation documents are set out in Appendix 1.



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I trust these comments are useful. As indicated above, we are mindful that the DCO and EIA process are critical in properly understanding the likely effects on the historic environment of the proposed new runway. We are therefore keen that further meaningful engagement and discussion between HAL, its consultant team and Historic England should happen at the earliest opportunity. It would be particularly helpful if this were to take place in the context of wider discussions around place-making and green & blue infrastructure with partner local authorities, statutory bodies and other stakeholders in the process. In the meantime, please feel free to contact me to discuss any of the points raised in this consultation response or if you would like further information.

Yours faithfully

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Appendix 1 – Historic England detailed comments

Document	Section	Comment
Consultation Overview	7.8	We note the overarching references to both the likely effects of the airport expansion on the historic environment, together with the various measures outlined elsewhere in the consultation documentation that would go some way to address these. However, as noted elsewhere in this consultation response, we are concerned that the only reference to assessing noise effects on the historic environment is in relation to registered parks and gardens. We consider that this does not reflect the requirements of the ANPS with regard to noise effects, and would welcome further discussions on how these can be properly satisfied.
	Section 9 – Community Fund	We have various concerns over the potential mitigation measures relating to the historic environment that are detailed elsewhere in this response. These principally relate to the process under which any mitigation would be delivered, including how, when and in what way they would be coordinated with the construction of the expanded airport. Nevertheless, we would stress the community benefits of heritage-related programmes, such as the refurbishment and reuse of historic buildings, and would wish to ensure that such projects were eligible for funding over and above whatever historic environment mitigation measures are eventually agreed in the event of airport expansion.
Preferred Masterplan	Para 2.2.3	We note the statement that ‘every effort has been made to ...take opportunities to mitigate the effects arising from the expansion of the airport’. As indicated elsewhere, we have significant concerns as to the treatment of the historic environment as a result of the project, and would





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		<p>suggest that this statement is somewhat premature as a result.</p>
	<p>Section 4.5 Design Strategy</p>	<p>You will note our concerns that are set out in detail elsewhere in this consultation response with regard to the impacts the project would have on the historic environment, and in particular on the conservation areas around the edge of the expanded airport (Harmondsworth in particular). We would point out para 4.30 of the ANPS which indicates ‘<i>A good design should meet the principle objectives of the scheme by eliminating or substantially mitigating the adverse impacts of the development ...</i>’. We do not consider that from the available detail in the various consultation documents the proposals for Harmondsworth in particular could be regarded as meeting this criterion for good design.</p> <p>Furthermore, we would also suggest that the Harmondsworth proposals fall some way short of addressing the design challenges identified at para 4.5.5, in particular that of ‘Belonging’, and in designing distinctive places and ‘<i>bringing associated benefits to neighbouring communities</i>’. Further detail on how high quality design in specific locations will be delivered is required.</p>
	<p>Section 4.7 Landscape Strategy</p>	<p>We note the ongoing development of the Landscape Strategy related to the project and its three constituent themes. Notwithstanding this, we consider that the lack of reference to the potential effects of such a strategy on townscapes, views and the setting of both conservation areas and individual heritage assets is an important omission. Improving the existing environmental condition of the landscape around the airport is an opportunity that the project should not fail to achieve, but this must be coordinated with other elements of the wider scheme to ensure synergy with other objectives wherever possible. The relationship between existing historic settlements and green belt/landscape across the wider Heathrow area should play a central role in the emerging landscape strategy to ensure a comprehensive and rounded approach.</p>



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		<p>We note the reference at 4.7.12 to a ‘Strategic Pilot Project’ for the Great Barn at Harmondsworth. Given the lack of detail around this suggestion, together with the Grade I status of the Barn, we are clear that any such proposal will need careful consideration and extensive discussions with all relevant stakeholders, including the English Heritage Trust as the owners. We are not aware of any such discussions to date.</p>
	<p>Section 5.4 Draft DCO Limits Boundary</p>	<p>We note that Figure 5.4.1 indicates that what would remain of the Harmondsworth conservation area after completion of the project is at this stage excluded from the DCO boundary. This would also appear to be the case for the other conservation areas around the expanded airport (Bedfont, Colnbrook, Cranford, Harlington and Stanwell). Our immediate concern is therefore how and when the mitigation measures for the historic environment in these areas (see comments elsewhere in this response) would be delivered, and whether they would be designed and undertaken in a joined-up manner with other works to be included in the DCO, such as road realignments or boundary treatments.</p> <p>All of the conservation areas in question would be affected to a greater or lesser degree by the project, with consequent impacts on their significance. Harmondsworth in particular is likely to experience major adverse impacts through construction effects, visual intrusion of increased numbers of flights and permanent and substantially increased noise effects from both planes and traffic on the realigned A4. We have had no indication to date that these areas would not be included within the DCO boundary and, notwithstanding detail set out elsewhere in the consultation documentation relating to proposed mitigation for the historic environment, as a result are concerned that this presents a risk that these proposals would potentially come forward much later than the construction phase, or indeed in a potential scenario not at all.</p>



		<p>We note paragraph 5.199 of the ANPS indicates that proposals should sustain and where appropriate enhance the significance of heritage assets. Given that such proposals for Harmondsworth and other conservation areas will not form part of the DCO application, they will potentially not be part of the decision-making process. As things stand therefore we would welcome clarification as to the status of the these proposals in terms of the DCO application.</p> <p>We also note references elsewhere in this consultation to the eventual DCO application including all necessary information and measures to mitigate against the effects of the expanded airport (see for example para 1.3, Non-Technical Summary of the PEIR). Given the undisputed effects on the historic environment across Harmondsworth and the other relevant affected conservation areas, this statement is clearly incorrect and the DCO application will be incomplete should the conservation areas continue to be excluded.</p>
	<p>Section 6 Proposals by Zone and Area Reports</p>	<p>Harmondsworth</p> <p>We note the further detail now available in relation to Harmondsworth in comparison to earlier stages of consultation, including the indicative airport boundary diagram included in the Area Report. We note the proposal for the realigned A4 to run as a single rather than dual-carriageway for its duration immediately to the north of the village and conservation area, although we consider that any lessening of impact is limited by the fact that it remains on the same route in close proximity to the built up area of the village and its heritage assets. We further note with interest the outline proposals for the future of the village and the potential reuse of a number of the historic buildings, including the Grade I listed Great Barn. Nevertheless, we continue to have serious concerns as to the likely effects on Harmondsworth and its heritage significance as a result of the scheme, together with its long-term viability as a residential community. The</p>





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challenge of sustaining such an historic village that will lose around 60 per cent of its housing stock, in addition to the noise and visual effects of the new runway and the realigned A4 and the removal of the existing access route from the south is clearly problematic. However, a failure to address this challenge would inevitably compromise the village's residential heritage character and significance.

We note the statement that HAL are 'exploring options' for the Great Barn, St Mary's Church (incorrectly identified as listed at Grade II in the Zonal section of the Preferred Masterplan when it is in fact Grade II* and currently on the Heritage at Risk register) and other buildings in the village. Given the highly sensitive nature of these buildings, it is important that any options for refurbishment and reuse are discussed with all relevant stakeholders as they develop – as indicated elsewhere, we are not aware of any engagement with either the owners of these buildings or other stakeholders to date.

While the suggestion that new visitors could be drawn into the village through the adaptation of the Barn and Church to host events, the provision of a new visitor centre (by implication in an existing historic building) and improvements to green spaces to the west of the Barn is interesting, we remain sceptical that these measures in themselves will be adequate to sustain economic activity and what would remain of existing residential character. We are not aware of any data or business plan that underpins these proposals or suggests this is a viable and realistic proposal. We believe there is a significant risk that the village and its heritage assets would become vulnerable to disuse, neglect and decay should such an approach be adopted and do not consider this to be an ambitious place-making strategy that is worthy of such an historic and characterful place.



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		<p>Further, the creation of a country park to the west of Harmondsworth would in turn create a need for facilities, not least in terms of parking. It is not clear where this would be located or what effect it would have on the remaining area of the conservation area and the historic buildings within it, while from the available documentation it would also appear that the diverted Duke of Northumberland's River would mean that the proposed park would be extremely limited in size. Similarly, while we also note the illustrations as to the potential design of the boundary treatments for the village, we consider that a Townscape Visual Impact Assessment is necessary to be able to understand the effects on the centre of the conservation area and potentially on the Barn and St Mary's Church. We look forward to further engagement and discussion on the potential strategy for Harmondsworth with HAL and its consultant team at the earliest opportunity. Please also see comments in relation to this issue within the section on PEIR Chapter 13.</p> <p>We would also further stress our concern with regard to the exclusion of Harmondsworth from the proposed DCO boundary, and the consequent potential for mitigation and heritage enhancement works to be effectively de-coupled from the airport expansion project. This point also applies to the other conservation areas where such potential enhancements are referenced, such as Cranford, Harlington, Colnbrook and Hythe End.</p>
	Section 7	<p>As with our previous consultation responses, we would point out that option A4 for the runway location has a greater adverse effect on the Harmondsworth conservation area than others. Similarly, the proposed route for the realignment of the A4 to the north of Harmondsworth would have the most significant impact in terms of noise and visual intrusion on the conservation area and potentially on the Great Barn and St Mary's Church.</p>
Proposals for		<p>We would direct you to our comments in respect of the proposed Community Fund and our</p>



Mitigation and Compensation		concerns over the DCO boundary and specifically the exclusion of the conservation areas around the existing airport.
Draft Code of Construction Practice	2.2 Delivery Model	The role and position of archaeology within the delivery management team and contractual relationships will be critical to delivering a good quality product. Comparable experience of major infrastructure projects in this regard is mixed but long contractual chains risk fragmentation of effort and application of formulaic processes. A strong client-side archaeological team will be essential for a project of this nature and level of complexity, together with a positive contractual relationship with a major archaeological organisation which rewards best practice, innovation and public benefit. Heathrow Terminal 5 was considered an exemplar archaeological project in its time and the new North-West Runway should offer a similarly progressive approach.
	2.4 Enforcement & 2.6 Monitoring	The role of local authority archaeologists and Historic England needs to be recognised and clarified. A framework for ongoing consultation and monitoring is needed to avoid as far as possible any potential differences of opinion reaching formal enforcement stage.
	2.12 Changes in Construction Methodology	We would suggest that this section should also contain detail as to how any potential changes to mitigation methodologies will be identified, discussed and agreed.
	3.2.1 Community Engagement	We would expect the historic environment to constitute a significant element of the Community Engagement Plan.



	4.1.4 24/7 Working	We are concerned that if 24/7 working is applied to archaeological investigations it could have a deleterious effect on the quality of mitigation. Clarification of the relationship between this type of working and archaeological investigation is required.
	5.4 Excavations and earthworks activities	Point 1: the aspiration to strip topsoil as close as possible to the period of excavation should be caveated by the need to allow sufficient time for archaeological investigation (including dealing with 'unexpected discoveries').
	8.2 Historic Environment Research Framework	We note the reference to 'Heathrow's existing research framework'. We assume that this in fact refers to the research framework still being developed on behalf of HAL by consultants. This emphasises the need to progress this part of the scheme promptly and we look forward to further discussions on the subject.
	8.3 Written Scheme of Investigation	8.3.1 We consider that the necessary engagement with stakeholders should be defined here and now, rather than being left to the WSI at a later and unspecified date. Reference to evaluation in the WSI secured by the DCO implies it will not have been undertaken to inform the DCO at the point of decision. This is an important issue – please refer to comments elsewhere in regard of field evaluation.
	8.4 Historic Environment Management	8.4.2 Given the scope of processes set out here, we recommend that there should be provision for a historic environment clerk of works, equivalent to the provision for measures to protect



	Strategy	biodiversity as set out in section 6.
	8.7	Measures in the event of unexpected discoveries of national significance: We note the proposed process. However, the document as set out omits any reference to measures taken to avoid this situation arising – notably ensuring adequate and appropriately timed archaeological evaluation. This section should be a ‘backstop’, rather the principal method for dealing with heritage assets equivalent to scheduled monuments.
	8.8 Omissions	<p>We note that the historic environment chapter is missing a section on monitoring, in contrast to other areas such as biodiversity and land quality. This is unacceptable.</p> <p>Connections should also be made between the community/interpretation strategies and this chapter. Specifically, further work is required on how the public can engage with the archaeological fieldwork.</p>
Preliminary Environmental Information Report PEIR)	Overarching comment	<p>The quality of the information that is provided in, and in support of, the PEIR is generally good, clear and well researched. The Archaeological Survival Model is particularly commended and we support its continued refinement and use to minimise development risk and inform further assessment and mitigation. However, we have serious concerns as to the adequacy of desk-based archaeological study alone to enable informed decision-making in compliance with the requirements of the ANPS. Further information will be necessary from field evaluation and we urge further consultation with local government archaeologists to agree and implement an evaluation strategy to inform the Environmental Statement.</p>



		<p>As indicated elsewhere in this response, given that Harmondsworth and the other conservation areas likely to be affected in noise and visual terms by construction and operation of the expanded airport appear to be excluded from the DCO boundary, we are unclear how any proposed mitigation measures will be taken forward. Given this, we do not consider the various statements indicating that the DCO at the point of application will be comprehensive in its measures to address the environmental effects to be accurate – see for example section 1.3 of the Non-Technical Summary or 6.2.7 of the DCO Project Description. We are keen to ensure the wider project adequately addresses all environmental impacts and look forward to further early engagement on this issue.</p>
	<p>Chapter 3 – DCO Project Alternatives</p>	<p>We note the statement at para 3.5.17 that the proposed rerouting of the A4 would be within 160 metres of the built up area of Harmondsworth and <i>‘could therefore exacerbate effects on views and setting, including at the listed Great Barn and St Mary’s Church’</i>. Notwithstanding any design and mitigation measures that could be incorporated to address the impacts, we would suggest that there can be no doubt that this route would in fact have an adverse effect on the conservation area and its historic buildings.</p>
	<p>Chapter 11 – Community</p>	<p>As indicated elsewhere, we consider that the evidence base in relation to the future strategy for Harmondsworth should be significantly strengthened in terms of socio-economic factors. The future management of the historic environment in Harmondsworth, and indeed other villages/conservation areas around the expanded airport, depends to a large extent on the economic health of the community. The future strategy for the village needs to be based on robust evidence as to who will live, work and visit there together with a credible and viable business-plan that will sustain and conserve the historic environment and the special interest of the designated heritage assets.</p>

	<p>Chapter 13 – Historic Environment. Table 13.8: Historic Assets Removal</p>	<p>We would welcome clarification on the criteria to be applied in deciding whether heritage assets are suitable for relocation. In particular, we are unclear as to why viability has been included as a potential consideration in these decisions. We also note that only three of the heritage assets scheduled for demolition in the Longford area are identified at 13.13.2 as being potentially suitable for relocation, while there is no information as to how these have been selected. We consider that all heritage assets that are likely to be demolished as a result of the airport expansion should be considered for relocation against an agreed and uniform set of criteria which should include heritage significance.</p>
	<p>13.5.6 Strategic Framework</p>	<p>We note and welcome the four separate elements of the strategic framework set out here, and look forward to early discussions as they continue to develop. Given that archaeological investigations are likely to begin early in the project, we consider it critical that the Research Framework is in place as part of the DCO. It will be important that the development of the Research Framework is an open exercise, drawing on expertise and knowledge from a wide-range of stakeholders, including local communities as well as academic representatives. It should include consideration of museum and digital dissemination and archiving in accordance with current development of best practice.</p> <p>We would however wish to record our concern regarding the likely approach to dealing with national important undesignated assets of archaeological interest. The study area is well known for such discoveries but the PEIR does not set out an approach to identifying and appropriately managing any specific monuments which would meet the relevant criteria. We would refer you here to the requirements set out in para 5.191 of the ANPS.</p>

Furthermore, we are given to understand that the significant majority of such evaluation of the area to be occupied by the new runway will not take place until the enabling stage of construction work and specifically after the point of decision. Given the well-known archaeological potential of the area (and the identification of c540 hectares as subject to significant harm), we do not consider that this approach adequately reflects para 5.193 of the ANPS:

- *Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, the applicant should include an appropriate desk-based assessment and, where necessary, a field evaluation. The applicant should ensure that the extent of the impact of the proposed development on the significance of any heritage asset affected can be adequately understood from the application and supporting documents.*

We therefore do not consider that it can reasonably be argued that no field evaluation is necessary to inform the DCO. This approach must be amended to comply with the ANPS.

We welcome and strongly support the proposed heritage management, design and interpretation strategies and would expect to see community archaeology forming a significant component. We note that the development will affect many surrounding communities, presenting opportunities for off-site practical engagement – for example historic village studies. We encourage close working with the community aspects of the Environmental Statement to identify appropriate approaches for different audiences that deliver social benefits. We support the inclusion of the historic environment in the green infrastructure and suggest that recreation of lost landscapes (eg wet woodland, lowland grazing march, orchards and horticulture) could make a positive contribution to wider environmental and social aims.





		<p>Design – we would welcome clarification of the degree of flexibility within the DCO, particularly over the location of buildings, hardstanding (roads, runways etc) and earthworks/landscaping. We acknowledge that many parts of the overall scheme will be fixed by the DCO giving little or no scope for later redesign should heritage considerations become an issue post-consent but some areas may have flexibility thus allowing for mitigation options other than simply archaeological investigation prior to loss. We encourage more consideration of options to reduce harm by design flexibility.</p>
	<p>Table 13.9 Interpretation Strategy</p>	<p>We note the proposal for the strategy to focus on aviation heritage. Given the history of the surrounding area, we consider this to be unnecessarily narrow in scope and would suggest widening it out to include other significant themes such as horticulture – this could be achieved by drawing on the various HLC and HAA reports that have been undertaken as part of background work.</p>
	<p>13.8.1-13.8.7 Noise Effects</p>	<p>We note the proposals to interpret the various categories within the Aviation Noise Metric such that in the wider study area the only heritage assets that will be assessed for noise impacts would be registered parks and gardens. We do not consider that this approach complies with the requirements of para 5.194 of the ANPS and clearly risks excluding heritage assets that derive some of their significance from a current absence of noise and a presence of tranquillity. We also consider the assumption that all places of worship in the wider study area are integrated into existing urban settings and therefore already affected by modern noise sources to be potentially flawed given the range of settlements and landscapes that are present in the area. Furthermore, it is important to bear in mind that Category A of the Noise Metric guidance could also capture other types of designated heritage assets sensitive to noise beyond places of worship. While we</p>





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		<p>acknowledge that applying the Noise Metric methodology and assessing every single designated asset in the wider study area would be a complicated and time-consuming task that would potentially add little to the overall assessment of the impacts, we consider that the proposed approach here does not comply with the ANPS and would give an incomplete picture of the overall noise effects on the historic environment.</p>
	<p>Harmondsworth 13.10.27- 13.10.46</p>	<p>We note the preliminary assessment of effects of the project on Harmondsworth and its historic environment, with which we do not disagree. Given the conservation area is within the central study area the noise effects will be included in the assessment to be undertaken against the noise metric methodology. However, in order to get a fully rounded assessment of the long-term effects on the village we consider that reference should be made to the significant noise effects that would be present in the village from the runway, aircraft movements and the realigned A4. We consider that this should also be the case for Colnbrook and the other conservation areas along the northern edge of the expanded airport.</p>
	<p>13.10.31 Obstacle Limitation Surface (OLS)</p>	<p>We would welcome clarification on the thresholds for affected heights given that the Gable Stores is a two-storey building with minimal opportunity to shorten the chimney stack. Confirmation that the OLS will not affect the tower of St Mary's Church would also be helpful.</p>
	<p>Table 13.14</p>	<p>We note the statement in relation to Harmondsworth at p13.165 indicating that would be left of the village would be a 'reduced but viable conservation area'. As indicated elsewhere in this response, we are not aware of any evidence base that suggests that the village has a sustainable future as a residential community given the significant adverse impacts likely as a result of land-take, noise, air quality and visual intrusion. Further detail in relation to population projections,</p>



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		likely economic activity and the level of noise impacts are necessary before judgments as to the long-term management of the village and its historic character can be made.
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