



Airports National Policy Statement Review Team  
Department for Transport

1<sup>st</sup> September 2026

Sent via email to [henpsconsultation@dft.gov.uk](mailto:henpsconsultation@dft.gov.uk)

Dear Review Team

## **Historic England Consultation Response to the Heathrow Expansion National Policy Statement**

### **Introduction**

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. We welcome the opportunity to respond to this consultation.

### **1) To what extent do you agree or disagree with the assessment of the need for the proposed expansion of Heathrow Airport? Explain your answer.**

Neither agree nor disagree.

Historic England notes that Government has accepted there is a strategic need for Heathrow expansion and the purpose of the Heathrow Expansion National Policy Statement (HENPS) is to provide the framework for assessing any future DCO application.

Whilst we make no comment with regard to the assessment of aviation need, we note that the Appraisal of Sustainability (AoS) identifies an overall major adverse effect on the historic environment. Any acceptance of need at national policy level should not lessen the requirement for rigorous assessment of heritage impacts at the project stage, nor lessen the weight afforded to the conservation of heritage assets during decision-making, including the delivery of relevant statutory duties. The final HENPS should make clear that strategic need does not predetermine how heritage harm will be assessed and considered during the DCO process.

**2) The government has proposed four tests which must be met for expansion to proceed. To what extent do you agree or disagree with how the government has set each of the 'four tests'? Explain your answer for each test:**

### **Air quality**

Neither agree nor disagree.

Historic England has no substantive comments on the air quality test itself. However, we note that air quality impacts may affect the significance, use and condition of heritage assets and should be considered as part of a comprehensive historic environment assessment where relevant.

### **Noise**

Partially agree.

Historic England welcomes the recognition that aviation noise can have wider impacts and particularly welcomes paragraph 5.288 (page 117) which requires detailed studies of heritage assets affected by noise. We are pleased to note specific mention of our advice on the Setting of Heritage Assets and the Aviation Noise Metric, and the footnote links to each document. We recommend these are retained in any future versions of the HENPS.

However, we recommend stronger recognition within the final HENPS that noise can affect the appreciation and understanding of heritage significance, and the contribution that setting makes to significance. Consideration of these impacts should inform both assessment and decision making. For example, the second bullet point of paragraph 5.40 (page 65) requires an assessment of noise sensitive premises and areas such as schools, hospitals, National Parks and National Landscapes. We further recommend that heritage assets are also referenced, including explicit reference to those that have the potential to be most affected, including the Grade I listed Great Barn at Harmondsworth, a property in the care of English Heritage which celebrates the 600th anniversary of its construction during 2026.

In addition, we also recommend that potential impacts on the Royal Botanic Gardens at Kew World Heritage Site, Windsor Castle (scheduled monument and Grade I listed building) and its associated registered parkland, including the Windsor Great Park (Grade I Registered Park and Garden), are explicitly referenced. The important contribution made by setting to the very great heritage significance of Windsor Castle, including Windsor Great Park, is set out in the Windsor Castle Setting Study (2025)<sup>1</sup>; the aurally intrusive nature of air traffic and the impact this has on the experience of the assets is expressly recognised. The Study acknowledges the notable contribution made by rural tranquillity to the experience of the Castle from the Great Park and states that *'any increase in traffic (including aircraft from Heathrow) has the potential to cause harm to this particular aspect of how setting contributes to our understanding and appreciation of the*

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<sup>1</sup> [Windsor Castle: identifying, conserving and enhancing the contribution of its setting to heritage significance](#)

*Castle's significance*'. A greater degree of understanding of the environmental factors (e.g. wind speed / air pressure) that affect the noise levels from these (and other) locations would be beneficial to allow for further exploration of potential mitigation measures.

The sections on Health (para 4.100, page 51) and Noise (para 5.35, page 63) refer to the impacts of vibration. We recommend the HENPS also recognises the impact of vibration on both the physical fabric of historic timber framed buildings, and the health impacts for occupants, during the construction phase and continued operation of Heathrow when expanded. Due to their construction such buildings might be noise sensitive receptors and therefore may experience a greater level of impact than other building typologies. It is important that heritage buildings, both domestic and commercial, remain in use to ensure they are cared for and remain viable.

We recommend the HENPS also recognises that noise mitigation can require physical changes to buildings to make them habitable during construction works. Close to Euston, the HS2 works have necessitated measures to reduce noise to homes, including installation of secondary glazing and air handling systems where residents can no longer open windows. Such measures can impact on the significance of the heritage assets. Care should be taken to ensure that any measures for reducing noise are sensitively considered and designed for heritage assets.

## **Climate change mitigation**

Neither agree nor disagree.

## **Economic growth across the country**

Neither agree nor disagree.

Historic England recognises the importance Government places on economic growth. We consider that economic benefits can be achieved alongside, rather than at the expense of heritage. The final HENPS should continue to ensure that heritage impacts are assessed in accordance with what is needed to deliver statutory requirements, whilst also supporting economic growth. Historic England research<sup>2</sup> found the heritage sector is a source of economic prosperity which, in 2024, was predicted to provide £39.4 billion in gross value added (GVA). Overall, for every £1 of GVA that the heritage sector directly generates, an additional £1.51 is added into the wider economy. This is driven by indirect (from the supply chain) and induced spending impacts, which occur when sector employees, visitors and businesses spend in the wider economy. Furthermore in 2023, the construction industry was the largest heritage sub-sector, generating £7.29 billion GVA. We would welcome greater emphasis in the HENPS of how the historic environment can contribute to, and also benefit from, economic growth. Doing so will encourage developers to seek creative solutions which may help to address the major adverse effects of expansion on the historic environment.

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<sup>2</sup> [The Economic Value of the Heritage Sector | Heritage Counts | Historic England](#)

Given the stated major negative impacts for the historic environment, we ask that further explicit consideration of these issues is provided within the statement.

We do not suggest that this should be a standalone test in itself but do consider the issue deserves greater overall prominence in terms of impacts and mitigation.

As highlighted in our response regarding noise we suggest the HENPS recognises the importance of heritage buildings remaining in use and cared for. The cumulative effects of noise and other infrastructure development and operation could potentially result in depopulation and consequential risks to the historic environment when historic buildings become vacant and/or uncared for.

**3) To what extent do you agree or disagree that the proposed mitigation measures for environmental impacts resulting from Heathrow expansion requirements are deliverable, effective and proportionate? Explain your answer.**

Largely disagree.

Historic England notes the inclusion of mitigation requirements for the historic environment, including provisions relating to archaeological assessment, recording and investigation, heritage impact assessment, and consideration of aviation noise impacts.

As the Appraisal of Sustainability (AoS) identifies major adverse effects on the historic environment, Historic England considers that a stronger emphasis on avoidance and minimisation of harm would be appropriate. The requirement to apply the mitigation hierarchy (paragraph 4.17, page 36), is welcomed. We are concerned, however, that the AoS indicates that for the historic environment there may be instances where it would be difficult to apply any stages of the mitigation hierarchy (avoid, reduce, mitigate and compensate). We do not consider this to be an accurate assessment and an appropriate general policy position to adopt, and we are uncertain as to how this conclusion has been drawn. Given the potential implications of this we would require additional clarification and assurance on this point.

Similarly, with the introduction of the Critical National Growth Infrastructure (CNGI) policy we are unsure what protection, or indeed mitigation, will be available for the historic environment in the decision-making process, in line with legislative requirements, and seek further discussion and clarity on this. We expand on our concerns regarding the introduction of CNGI in our response to question 5.

For example, paragraph 4.30 (page 38) means that CNGI will outweigh substantial harm or total loss of designated heritage assets providing the mitigation hierarchy has been applied, yet the AoS also acknowledges (paragraphs 9.2.180, 9.2.184-185) that no stages of the mitigation framework may (in some instances) be suitable for the historic environment. We are concerned that this appears to suggest a 'development at all costs' with no mitigation approach. We also highlight this in our response to question 5 on CNGI.

We suggest, where appropriate, that consideration of relocating historic buildings and structures from land earmarked for development be included as a form of mitigation. This is not without precedent; in 1988 during development at Stanstead airport two buildings were relocated from Coopers End, Takeley to Wat Tyler Country Park and a further building was moved from Rettendon to Battlesbridge and remains on the [National Heritage List for England \(NHLE\)](#); in 2001 Historic England (then English Heritage) engaged in the relocation of the Waterpoint at St Pancras to enable Channel Tunnel Rail Link works. The [Weald and Downland Museum](#) has also successfully relocated over 50 historic buildings at threat of demolition to its site in West Sussex as a tourist attraction and offers extensive [educational and skills programmes](#). We acknowledge the cost implications and that it may only potentially apply to a small number of heritage assets but feel this option should be included. Consideration of other compensatory measures given the unusual circumstances here would be welcomed.

Linked to the above paragraph we note paragraph 4.34 (page 38) regarding compensatory measures for Habitat Regulations Assessment derogations. Given the extent to which the historic environment is likely to be impacted by development, in this instance we would welcome exploration of a compensatory approach relating to the historic environment in a wider sense. While it is not possible to directly compensate for the loss of heritage assets, given they are inherently unreplaceable, we consider there may be potential for wider indirect benefits to be delivered.

We recommend the final HENPS place greater emphasis on:

- avoiding harm in the first instance. Where this is not possible robust and effective minimisation and mitigation measures should be put in place which recognise the irreplaceable nature of heritage assets and reflects the overall major adverse effect on the historic environment.
- preserving archaeological remains in situ wherever feasible. We recognise this will not be possible for some 'fixed' elements of the scheme. However, where a degree of flexibility is possible, following early and proportionate archaeological evaluation, developers should be advised to preserve in situ (please also see our comments on Footnote 178 at question 9).
- addressing cumulative impacts on the wider historic environment.
- ensuring mitigation measures are secured and enforceable through the DCO process

**5) To what extent do you agree or disagree with the proposed designation of Heathrow expansion as defined in the draft HENPS as Critical National Growth Infrastructure (CNGI)? Explain your answer.**

Disagree.

Historic England is keen to support the government's growth agenda in a way that fully considers the statutory duties relating to the historic environment. We are concerned the proposed Critical National Growth Infrastructure (CNGI) policy risks undermining the protection given to heritage, and how heritage impacts are to be considered during the decision-making process.

We recognise the uniqueness of the HENPS as detailed in paragraph 1.7 (page 7). However, we are concerned that the introduction of the CNGI policy, although currently specific to this NPS, introduces a new policy concept with potentially a broader resonance. We note specific reference to CNGI does not appear in the Planning and Infrastructure Act 2025 or, to our understanding, any other legislation and so seek further clarity on its inclusion here. We are also concerned about the inconsistency of terminology and how CNGI relates to other policies such as Critical National Priority (CNP) and Critical National Infrastructure (CNI). With the introduction of CNGI we consider there is great potential for confusion, for example, alongside the policy of Critical National Priority in EN-1 and other energy NPSs. This could make the decision-making process more complex and time-consuming. We remain concerned about the potential for harm to the historic environment arising from the application of the CNGI policy. We seek further conversations to better understand this policy and its implications both to the historic environment and potential wider planning implications.

The requirement to apply the mitigation hierarchy (paragraph 4.17), coupled with the requirement to seek advice from the 'relevant statutory body', which although not mentioned, presumably includes Historic England, is welcomed. It would be helpful if this could be made more explicit in the HENPS.

The reference to exceptional circumstances that may outweigh the CNGI presumption (paragraph 4.21) specifically refers to unacceptable risks to irreplaceable habitats but does not recognise that heritage assets are also irreplaceable (though such assets are recognised as an irreplaceable resource elsewhere in national policy). Given the number of heritage assets that will be harmed by the HENPS, we recognise the need for pragmatism; however, this should not preclude reference to heritage assets of highest significance, especially those whose importance resonates within the national consciousness.

In particular, paragraphs 4.29 and 4.30 suggest that residual impacts are unlikely to outweigh the need for Heathrow expansion and indicate that CNGI should be treated as meeting policy tests requiring clear outweighing of harm or exceptional circumstances.

Historic England recommends that the final HENPS should make clear that:

- statutory heritage duties remain fully applicable;
- the conservation of heritage assets continues to attract great weight;
- heritage impacts must be assessed on their own merits;
- the CNGI designation does not predetermine the balancing exercise at DCO stage.

**6) To what extent do you agree or disagree that the compensation for affected residents is fair? Explain your answer.**

Partially agree.

Historic England notes proposals focused on compensation for affected residents. It should be acknowledged that some of the buildings affected will be heritage assets, and the proposals will impact on heritage significance, historic communities and the

character of the place. This brings into focus the economic impact of proposals on the owners of heritage assets (both residential and non-residential). While all affected residents should be treated in the same way regardless as to whether they live in or occupy designated heritage assets, there may be a business reason why occupiers of heritage assets should be treated differently, especially where the heritage asset is open to the public, generates revenue and where its appreciation and attractiveness will be negatively impacted by the expansion proposals. The HENPS should ensure these are understood, in particular for those in public ownership, and articulated in the proposals, enabling a suitable response through the DCO application process.

**7) To what extent do you agree or disagree with the requirements for surface access, including the passenger mode share targets, and the [Surface access vision document](#)? Please also provide any further comments you may have on surface access.**

Neither agree nor disagree.

Historic England welcomes the recognition that surface access infrastructure forms a significant component of the overall scheme.

Particular consideration should be given to potential impacts arising from:

- new road and rail infrastructure;
- impacts on designated and non-designated heritage assets;
- consideration of archaeological potential and sensitivity
- changes in historic landscape character;
- cumulative effects associated with both airport and transport infrastructure.

Historic England recommends that any future surface access proposals are developed to minimise impacts on heritage assets and their settings where possible and that cumulative heritage effects are assessed comprehensively.

**9) To what extent do you agree or disagree that the draft HENPS provides an effective framework for decision making on development consent applications? Explain your answer.**

Partially agree.

Historic England supports the inclusion of a dedicated section on the Historic Environment (from page 115). This helpfully identifies direct effects on heritage assets, and through effects on *'their setting, landscape context and historic character'*. It also recognises the importance of setting on the significance of heritage assets, and the importance of non-designated heritage assets.

We support the approach for a proportionate level of detail according to the asset's importance (para 5.287). Paragraph 5.287 advises applicants to include an appropriate desk-based assessment and where necessary field evaluation. Footnote 178 indicates the Secretary of State, except in exceptional circumstances,

expects appropriate field evaluation to be secured via post-consent requirements. We consider that pre-determination evaluation needs to be the minimum necessary to inform a reasonable understanding of archaeological survival, and where feasible should be in the form of non-intrusive surveys. We acknowledge the desire to have sufficient relevant information, identify non-designated heritage assets (NDHA) of national importance and apply the mitigation hierarchy.

We suggest the effectiveness of the HENPS for decision making could be further improved by greater clarification of the relationship between CNGI and heritage policy. As we have highlighted in our response to questions 3 and 5, we are concerned about the introduction of CNGI and so seek to ensure the historic environment, including cumulative effects, is fully considered in all decisions. We acknowledge some negative impacts on the historic environment are inevitable in a development of this magnitude so ensuring avoidance (where possible) and minimisation of impacts are of particular importance.

We welcome the reference to tranquillity in the Landscape and visual impacts section (paragraph 5.308) as this can also contribute to the setting and significance of heritage assets. It would be helpful if this link could be made more explicit in the HENPS (please also refer to our comments on the noise impacts on Windsor Great Park in question 2). The Round Tower and East Terrace at Windsor Castle are also important, designed viewpoints. We recommend the HENPS should also recognise the potential for Heathrow expansion to affect the significance of Windsor Castle through changes to the character of the skyline as experienced from the East Terrace and the Round Tower, and through impacts on key views and the appreciation of the Castle within its historic landscape context.

We note applicants are advised to consider landscape and visual matters in the early stages of siting and design (paragraph 5.311), and suggest this advice also be explicitly expressed in the historic environment section.

Further clarification of how any other proposals that may come forward would be dealt with under the terms of this HENPS would be welcomed.

#### **10) Do you have any comments on any of the additional supporting documents, including the [Appraisal of Sustainability \(AoS\)](#)**

Historic England notes that the Appraisal of Sustainability (AoS) identifies an overall major adverse effect on the historic environment. We agree with this assessment which clearly identifies the heritage impacts of the proposal.

We recommend that the implications of these findings are reflected more clearly within the final HENPS and that stronger policy requirements are included where necessary to avoid, minimise and mitigate heritage impacts.

For example, we are disappointed to note that the AoS non-technical statement mentions the historic environment briefly (final bullet point, Environmental Effects, page 7). We would advise that greater recognition of this in the summary would reflect the AoS's own conclusion of major adverse effect on the historic environment, coupled with the difficulty of mitigating these effects on irreplaceable heritage assets. For example, the Mitigation and uncertainty section (page 9) could

helpfully include reference to the historic environment in the fourth paragraph alongside greenhouse gas emissions and noise and habitat loss.

The AoS rightly identifies an overall major adverse effect on a variety of elements of the historic environment (paragraph 9.2.184). It then states (paragraph 9.2.185) that *'harm to the historic environment would require clear and convincing justification in decision making, rather than being fully mitigated through design and compensation.'* In addition, the Mitigation, design and uncertainty section of the AoS (paragraph 9.2.175) states the mitigation hierarchy, sensitive scheme design, archaeological investigation and recording and opportunities for interpretation where appropriate will all form part of the mitigation for the historic environment. In combination much of this is to be welcomed, but should the CNGI policy be applied then, as we currently understand it, the mitigation hierarchy would be limited. This is of concern in relation to the historic environment.

Given the proposed introduction of the CNGI policy the relationship between the findings of the AoS and the decision-making framework within the HENPS would benefit from further clarity. We would be pleased to work with government to ensure impacts on the historic environment are fully considered (see also our comments on CNGI at questions 3 and 5).

## **12) What, if any, additional comments do you have on the draft HENPS?**

Historic England is pleased to note specific mention of our advice on the Setting of Heritage Assets and the Aviation Noise Metric (paragraph 5.288), and the footnote links to each document. We recommend these are retained in any future versions of the HENPS.

Whilst we welcome proposals set out in paragraph 5.289, Historic England suggests there could be further scope to be more specific in relation to expectations. It is important to sustain historic buildings and places, ensuring assets are used in a manner that is consistent with their conservation, so they can be maintained and have a vibrant future.

Additionally, the first bullet point of paragraph 5.289 refers to the need for sensitive design. Historic England advises that such design needs to be informed by the character and appearance of conservation areas and the contribution of setting to the significance of listed buildings. This is particularly necessary where there is a clear interaction and adjacency to the historic environment, e.g. where the boundary of the airport is newly formed adjacent to the remaining part of Harmondsworth village.

Historic England considers the Place making section (paragraph 4.110-4.112, page 53) would benefit from the addition of reference to the contribution the historic environment makes to place making, and the potential impact development will have on this. Historic England has highlighted this contribution through a range of publications and research, including via its [Heritage Counts](#) series. Taken together this series demonstrates the historic environment can be a foundation of successful place-making through the creation of economically successful, distinctive, socially connected and sustainable places. Given the density and significance of heritage assets potentially impacted by the draft HENPS, it is our view that the contribution

the historic environment makes to place making should be incorporated into this section.

We would also welcome greater recognition in the HENPS of the contribution the historic environment makes to community wellbeing and cohesion, sense of place, health and the economy. Heritage can support communities and strengthen their connection to place. Historic England has undertaken research<sup>3</sup> to understand how the historic environment can help to achieve positive social benefits. This found that engaging with local heritage improved knowledge and appreciation of heritage and deepened connection to place. Furthermore, the Culture and Heritage Capital Framework<sup>4</sup> developed by Historic England, alongside the Department of Digital, Culture, Media and Sport and other arm's length bodies, has established an economic approach for valuing cultural heritage assets and the benefits they provide to people and businesses. We advise greater recognition of the opportunities the historic environment can provide to communities, businesses and the economy is included within the HENPS. We encourage the HENPS to see heritage in the vicinity of Heathrow as an asset rather than a constraint or cost.

National Planning Team  
Historic England  
1<sup>st</sup> September 2026

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<sup>3</sup> [Wellbeing, Place Connection and Community Cohesion | Historic England](#)

<sup>4</sup> [Culture and Heritage Capital | Historic England](#)