

TR020001: Application by London Luton Airport Limited for the London Luton Airport Expansion Project The Examining Authority’s Further Written Questions and requests for further information

Submission on behalf of Historic England

<p>Increased frequency of flights and impacts on designated heritage assets Question 14 in [EV15-013] asked the Applicant to explain why the assessment for Luton Hoo in Chapter 10 of the ES [AS-077] has considered how the increased frequency of aviation noise would affect the aesthetic appreciation of that asset (in addition to changes in noise contours) but this has not been considered for other designated assets scoped into the assessment, particularly those located under the flight paths. Should the assessment of effects and harm on designated heritage assets, in particular Registered Parks and Gardens (RPG), consider the implication of increased frequency of flights and how this would or would not impact on the setting of individual assets? If not, why not?</p>	<p>The effects of increased noise has the potential to effect the wider setting of any heritage asset, particularly development where noise is an intrinsic side-effect, such as industrial or transport related development. We therefore believe that in this particular instance there is very good reason for the effects of noise to be scoped into an assessment of setting. This would also be in accordance with our published guidance <i>The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3</i> which includes noise on the suggested assessment checklist. Otherwise we would expect the applicant to provide robust evidence to substantiate any claim that such an assessment is not warranted.</p>
<p>Contribution towards Luton Hoo Question 15 from the Action Points to ISH8 [EV15-013] asked for CBC views about the merits of seeking a contribution towards offsetting the residual impact of the proposal that could be put towards conservation management at Luton Hoo. In their response [REP6-090], they have stated “Mitigation measures, of which none are proposed for Luton Hoo, should address specific issues where impact and harm can be actively reduced. Financial contributions to offset measures would not constitute mitigation”. Please provide your response to this</p>	<p>We appreciate that financial contributions would not constitute mitigation, but as we have stated previously, because the applicant considers that mitigation of the residual impact is not achievable in this instance, we have therefore suggested that financial contributions might instead be an appropriate means of off-setting the impact.</p>