

Aviation Strategy call for evidence Response



10 October 2017

The Heritage Alliance is England's biggest coalition of heritage interests, bringing together over 100 mainly national organisations supported by over 7 million members, friends, volunteers, trustees and staff. From historic buildings and museums to canals, historic vehicles and steam railways, the Heritage Alliance's diverse membership owns, manages and cares for the vast majority of England's historic environment.

England's historic environment is a unique asset that draws millions of domestic and international visitors each year. The historic environment is a significant contributor to the economy attracting domestic and international tourists. This in turn supports thousands of jobs and contributes to national and local economic growth.

There were 15 million heritage related international visits in 2015, almost half the total of all inbound international visits (47%). There has been a steady increase since 2010. International tourists spent £9.2bn on heritage-related visits in 2015.¹

As such the future of the Aviation sector is of great importance to the heritage sector. Chapter 7 of the Call for Evidence, 'Support growth while tackling environmental impacts', is most relevant for the Alliance. We agree with the Government's statement that 'Aviation brings huge benefits to the economy and society, but this growth comes at an environmental cost'. It is important that the new Aviation Strategy properly considers and understands impacts on the heritage sector.

Our responses to the most relevant questions in Chapter 7 are below:

Whether there should be a new framework to allow airports to grow sustainably, and if so what that framework should be

The Government must work with Historic England, and where appropriate the owners of heritage attractions and others, to ensure that the harmful effects of airport growth are minimised and where possible offset as part of any development consent. The impact of the proposals on designated and non-designated heritage assets, scheduled monuments etc. should be considered explicitly as a key part of this process of the Secretary of State considering any application.

Whether the government has the right structures in place to support airspace modernisation

It is important to ensure that the future operability of heritage aircraft is not jeopardised by a new strategy. This should consider allowing paid for flights on heritage aircraft, their ongoing maintenance and future availability of appropriate fuels.

¹Heritage Counts 2017 - Heritage and the Economy <https://content.historicengland.org.uk/content/heritage-counts/pub/2017/heritage-and-the-economy-2017.pdf>

What the government could do to help co-ordinate the planning and delivery of improved surface access to meet the needs of consumers

Careful thought should be given to how the necessary infrastructure impacts on the historic environment and how this can be minimised. This should be shared publicly at an early stage to allow consultation and the opportunity for suggestions which can reduce harm.

Given the number of large infrastructure projects in the pipeline, such as airport expansion, HS2, Crossrail 2, the Bakerloo line extension etc. This potential skills shortage is noted in the British Academy's recent report 'Reflections on Archaeology'
<http://www.britac.ac.uk/sites/default/files/Reflections%20on%20Archaeology%20report.pdf>

The Government must ensure that there is sufficient supply of archaeological skills to carry out work on infrastructure projects needed to ensure that heritage is not destroyed during construction. Supply of skills may become even more of an issue post Brexit if a restrictive visa regime reduces access to skilled archaeologists from within the EU.

The supply of skills is one of the issues which is to be considered as part of the heritage sector specific deal in the industrial strategy. Our response to the industrial strategy consultation is here:
<http://www.theheritagealliance.org.uk/tha-website/wp-content/uploads/2017/04/Industrial-Strategy.pdf>

How to achieve the right balance between growing the sector, and ensuring effective action is taken to tackle carbon emissions, reduce noise and improve air quality

To ensure that the benefits of expansion are realised, careful thought must be given to the impact of flight path locations and timings to ensure that the south east remains an attractive place to visit. Similarly, the Government must ensure that public transport links are available at sites of expansion to facilitate tourism.

Heritage Alliance members have numerous historic properties in areas which would be affected by likely airport expansion in the South East.

In 2014, English Heritage commissioned research on 'the Potential Noise Impacts on the Historic Environment by Proposals for Airport Expansion in England' This is available here:
<https://content.historicengland.org.uk/images-books/publications/aviation-noise-metric/eh-aviation-noise-final-report.pdf/>

This report recommends using the LAeq,16 hr and N60 indices to quantify and assess the impacts of aviation noise on heritage sites. This allows the assessment of the likely impacts on heritage sites against the current minimum statutory and established policy requirements and guidelines.

Heritage tourism sites affected by aircraft noise face the negative consequences of becoming less attractive and generating less money from visits, and events such as weddings. Loss of revenue could put their survival at risk.

The Historic Houses Association (HHA) has stressed that our heritage is an essential part of England's tourism offer to inbound visitors; as such, heritage assets such as historic houses should be specifically protected against the impact of aircraft movements that could adversely affect their cultural, historic and economic value and people's enjoyment of them.

The HHA is particularly concerned about the impact of pollution on historic house visitor attractions - both noise pollution, which will adversely affect the setting of historic houses and their

attractiveness to visitors, and the additional pollution generated by both the construction of the successful scheme and the increased air traffic. The HHA advises that the economic consequences of failing to deal with the twin issues of noise pollution and visual intrusion caused by inappropriate, high capacity flightpaths could be exceptionally serious for some historic house tourism businesses.

Specific proposals for runway expansion should be designed and located to cause minimum damage to the historic environment and historic buildings. Thought should be given to whether existing buildings could be used for airport related purposes to ensure they continue be well maintained.

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