



Historic England

To: AviationStrategy@dft.gov.uk

CONSULTATION RESPONSE: Aviation 2050 — the future of UK aviation

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 submit a response to this Call for Evidence on the following points. We have confined ourselves to those few areas which are relevant to our locus, particularly in relation to the government's preferred approach for developing a framework for the sustainable growth of aviation.

Chapter 3 - Ensure aviation can grow sustainably

Consultation questions

Consider the policy proposals in this chapter and answer the following either for the chapter as a whole; groups of policies within the chapter and/or individual policies:

1. How could the policy proposals be improved to maximise their impact and effectiveness in addressing the issues that have been identified?

Please see below for issues which may not have been fully considered.

2. How should the proposals described be prioritised, based on their importance and urgency?

Any strategy for aviation growth should be developed taking into consideration the Partnership for Sustainable Growth, and are equally important.



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3. *Are you aware of any relevant additional evidence that should be taken into account?*

The *Airports National Policy Statement: new runway capacity and infrastructure at airports in the South East of England, June 2018* sets out (p77 onwards) policies on aviation and the historic environment, including methodologies for applicants' assessments. This approach should be incorporated going forwards.

Additionally, it is a requirement in the Airports National Policy Statement that the methodology in the Temple report is used to assess the potential noise effects on the historic environment from the Heathrow expansion project. This can be found here:

<https://research.historicengland.org.uk/Report.aspx?i=15740>

Our statements on climate change and the historic environment can be found here:

<https://historicengland.org.uk/research/current/threats/heritage-climate-change-environment/what-effects/>

<https://historicengland.org.uk/whats-new/statements/climate-change/>

For information on airports and airport buildings as heritage assets:

<https://historicengland.org.uk/images-books/publications/historic-airports/>

Although this consultation relates to non-military aviation, this information below may also be of use, especially as there is a cross-over of military-civilian use at some sites:

<https://historicengland.org.uk/research/current/discover-and-understand/military/historic-military-airfields/>

4. *What implementation issues need to be considered and how should these be approached?*

When implementing any strategy on aviation growth, it will be important to ensure that potential impacts on the historic environment are considered as early in the process as possible at a strategic level. This will help avoid problems further down the line. Such an approach is adopted in the *Airports National Policy Statement: new runway capacity and infrastructure at airports in the South East of England, June 2018*.

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5. *What burdens, both financial and regulatory, are likely to need to be managed and how might those be addressed?*

Strategies for aviation growth should give appropriate consideration to potential impacts on heritage. These can be addressed using the approach set out in the *Airports National Policy Statement: new runway capacity and infrastructure at airports in the South East of England, June 2018*.

6. *Are there any options or policy approaches that have not been included in this chapter that should be considered for inclusion in the Aviation Strategy?*

We consider there is an omission in the Aviation Strategy relating to potential impacts on the historic environment. This is detailed further below.

Consultation questions

The partnership for sustainable growth is a long-term policy framework and will need to be flexible enough to respond to new information, developments and changing circumstances, while providing sufficient long-term confidence for the industry and communities.

8. *To what extent does the proposed partnership for sustainable growth balance realising the benefits of aviation with addressing environmental and community impacts?*

As well as climate change which is included within the document, it is important that appropriate consideration is given to the possible impacts of new infrastructure (such as transport links to airports, the expansion of airports and the creation of new ones). Such infrastructure has the potential to cause damage to heritage assets, from extensive historic landscapes or townscapes to individual buildings and monuments. For example, the Grade I listed medieval tithe barn and its setting at Harmondsworth is likely to be impacted by the proposed third runway at Heathrow. Impacts on the historic environment may also include noise (for example, the disruption to a previously tranquil setting of a heritage asset) and vibration.

Some airports and airfields (both civilian and military) are important heritage assets in their own right, and plans for aviation growth could also impact on these unless their historic significance is taken into consideration.

Given these potential direct impacts, we believe there are some omissions in the proposed Partnership for Sustainable Growth. Figure 8 on p51 summarises the Partnership, and includes such environmental factors as noise, air quality, communities and climate change. However, we could not see direct impacts on the environment as a whole mentioned anywhere, for example as set out in the *Airports National Policy Statement: new runway capacity and infrastructure at airports in the South East of England, June 2018*. To be truly sustainable, the historic environment (as well as the natural environment) needs to be considered as a significant factor in

the Partnership, alongside the other environmental factors such as air quality and noise.

9. How regularly should reviews of progress in implementing the partnership for sustainable growth take place and are there any specific triggers (for example, new information or technological development) that should be taken into account?

Regular reviews of the Partnership need to take place to ensure its success, and to ensure it takes into consideration any ongoing changes in guidance and legislation.

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June 2019.



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