



HISTORIC HOUSES ASSOCIATION

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RESPONSE TO THE CONSULTATION ON RELAXING THE RESTRICTION ON THE DEPLOYMENT OF OVERHEAD TELECOMMUNICATIONS LINES

The Historic Houses Association represents Britain's historic houses, castles and gardens in private ownership. The HHA has 1,500 member properties throughout the UK of which over a third are open to the public. The HHA estimates that approximately two-thirds of the built heritage is privately owned and maintained. Between them HHA members represent, collectively, one of the greatest 'ownership' of listed buildings in Britain: both I and II* properties as well as of Grade II properties, many being ancillary buildings.. The HHA welcomes over **14 million visitors** each year and **one in five** of all HHA properties offers educational visits and there are more than 300,000 such visits annually.

The beneficial effect that public visiting to these places has on the wider economy is estimated at an additional **£1.6 billion**. Nearly **40,000** people are directly employed by HHA members or are employed in businesses in their grounds

The costs of maintaining Britain's private houses, castles and gardens are significant and expenditure by private owners in looking after England's historic environment is substantial.

Owners spend some £3.5 billion annually on maintenance and conservation (*Valuing our Heritage 2007: National Trust, English Heritage, Heritage Link, Historic Houses Association, Heritage Lottery Fund*). However, the backlog of urgent repairs at HHA member houses alone totals over **£390 million** an increase of more than **£130 million** on the figure five years earlier. Only 10% of the costs of major repairs to privately owned historic houses are funded by public grant, so ensuring the economic viability of historic houses is of great importance.

Summary of Key Issues

- **Any legislation should acknowledge not only the importance of communications infrastructure to the UK economy, but also that of the historic environment**
- **There should be special protection for the settings of listed buildings**
- **The nature of protection for communities and the environment needs to be made explicit**
- **The consultation process must be robust with a binding outcome**
- **There is a potential conflict with Government planning guidance and legislation, such as the Localism Act**

Background

- a. Britain's historic houses are an important resource, which benefits the entire nation. For example, 80% of international visitors say that their principal reason for visiting Britain is connected to heritage and culture¹.
- b. Historic houses provide character, distinctiveness and a sense of place and help create pride in where people live. 87% of British people think that the historic environment plays an important part in the cultural life of the country².
- c. In its response to the National Planning Policy Framework, the HHA made it clear that the settings of listed buildings and thereby their economic viability, should be

¹ British Tourism Framework Review (2009)

² Valuing Our Heritage (2007)

specifically protected against any development which might adversely affect their settings and hence affect their sustainability.

1. Economic Growth

The consultation document's opening statement identifies the importance of improving the UK's communications infrastructure in order to stimulate economic growth. While there may well be a case for this, it is essential to ensure that the stimulation of growth in one sector does not stifle it in another.

The historic environment is at the heart of British tourism, which is the fifth largest industry in the UK, providing 2 million jobs³. 80% of international visitors say that their principal reason for visiting Britain is connected to heritage and culture. The beneficial effect that visiting historic sites has on the wider UK economy is estimated at £1.6bn⁴.

Relaxing the restrictions on the deployment of overhead power cables is likely to result in damage to the natural and historic environment, with a consequent negative effect on the British tourism industry.

2. Protection of the Historic Environment

National Parks, Areas of Outstanding Natural Beauty, Conservation Areas, areas of Special Scientific Interest, the Broads and World Heritage Sites will require planning permission for the deployment of overhead telecommunications lines after the proposed relaxation of restrictions, as is currently the case.

However, this will no longer be the case in respect of individual listed buildings and substantial damage could be done to the settings of historic places as a consequence. The settings of our historic houses, for example, would lack the magnetic appeal that they have for domestic and foreign visitors if the environment within which each is set, should be damaged by unsightly overhead lines. Such a development would have an impact not just on visitor numbers and the tourism industry, but the economic viability of affected houses.

English Heritage has recently published its guidance, *The Setting of Heritage Assets*. It plainly states that: 'The significance of a heritage asset derives not only from its physical presence and historic fabric but also from its setting – the surroundings in which it is experienced. The

³ House of Commons Culture, Media & Sport Committee Tourism Report (2008)

⁴ Parliamentary Question reply by Rt Hon Margaret Hodge MP (2009)

careful management of change within the surroundings of heritage assets therefore makes an important contribution to the quality of the places in which we live'.

Privately owned historic houses have little access to external funding and the strength of many houses exists not only in their buildings, but in their settings, so any undermining of safeguards which protect the settings of historic buildings, such as relaxing restrictions on overhead lines, would not only be detrimental, but could even endanger their economic viability and thus their very existence .

3. Consultation and Decision-making

New infrastructure can only be erected if existing infrastructure cannot be shared. This, the consultation document claims, can only be done in 'consultation' with local communities. However, no clear, robust process has apparently been devised, which will provide a binding outcome.

A mere consultation process will provide no protection for historic buildings in the event of a dispute, if there is no independent adjudication, for example by the Planning Inspectorate. Such a process need not be complex and need not be a hindrance to justifiable overhead telecommunication line deployment, but it must be open, independent and transparent, taking into account more than economic factors related to the telecommunications industry.

4. Potential Conflict with other Legislation

The recently-enacted Localism Act is intended to provide real power on planning decisions to local communities and Neighbourhood Forums. However, the provisions for the relaxation of restrictions on overhead lines could have precisely the opposite effect.

The consultation document appears to reinforce the idea in the draft National Planning Policy Framework, that economic growth is the principal factor in all planning decisions. If this relaxation is accepted as currently proposed then pressure may grow to have regulation of overhead power lines relaxed, as well. The relaxation of the guidance in respect of overhead telecommunication lines may be considered to set a dangerous precedent and suggests that legislation or planning guidance which protects Britain's historic environment may be removed or amended purely for the purposes of sector-specific, short term economic growth.

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