



ENGLISH HERITAGE

Response to the consultation on the 6 draft energy National Policy Statements - Submitted on behalf of English Heritage

Summary

Section 5.8 of EN-1 (which focuses on the historic environment) has been the subject of detailed discussion between English Heritage and the Departments of Energy and Climate Change, Communities and Local Government and Culture, Media and Sport. As these discussions are continuing, we have no specific comments on the text of this section but would stress the importance of ensuring consistency between the NPSs and PPS5 – Planning for the Historic Environment). Our comments on the other sections of the NPSs are set out below.

The role of English Heritage

English Heritage is an Executive Non-Departmental Public Body sponsored by the Department for Culture, Media and Sport, with our funding agreement signed by CLG and DEFRA. We work in partnership with central government departments, local authorities, voluntary bodies and the private sector to conserve and enhance the historic environment, broaden public access to our cultural heritage, and increase people's understanding and appreciation of the past.

We are the UK Government's statutory adviser and a statutory consultee on all aspects of the historic environment and its heritage assets. This includes archaeology on land and under water, historic buildings sites and areas, designated landscapes and the historic elements of the wider landscape.

Question 3: Do you have any other comments on the revised National Policy Statements and accompanying documents? These are:

a) Revised draft Overarching National Policy Statement for Energy (EN-1)

4.5.3

It should be noted that design which is appropriate to the context and of high quality can also mitigate impact on the historic environment (as well as 'existing landscape character, landform and vegetation').

5.5.8

In addition to those listed, applicants should also seek to 'identify any effects of physical changes' on the significance of heritage assets.

5.8

As referred to above, discussions with DECC have led to the text developing since the publication of this consultation. Therefore, we will merely re-emphasise the importance that all NPSs are consistent with, PPS5.

5.9.5

Applicants' assessments should also include possible impacts of the decommissioning of any project on the landscape. Reference to the decommissioning stage will ensure consistency with other impacts (for example see 5.12.1).

5.9.22

There needs to be some consideration of the impact mitigation measures may have on the historic environment (filling in gaps in existing hedge lines may alter the historic character of a place and bunding for screening may impact on archaeological evidence). These factors need to be taken into account when making decisions regarding suitable mitigation.

b) Revised draft National Policy Statement for Fossil Fuel Electricity Generating Infrastructure (EN-2)

2.4.1 and 2.6

We would question the logic that says there is a technologically specific impact on the landscape, but not on the historic environment, as there is a substantial overlap between the two impacts. This is a point which is also made in relation to other NPSs.

c) Revised draft National Policy Statement for Renewable Energy Infrastructure (EN-3)

2.5.31

To properly reflect the different types of designation the opening section of this paragraph should be redrafted as follows (additions in *italics*):

'In sites with nationally recognised *landscape* designations (Sites of Special Scientific Interest, National Nature Reserves, National Parks, Areas of Outstanding Natural Beauty, *Registered Parks and Gardens*).'

These changes relate to the fact that the list does not represent a full list of designated sites and places, which is the interpretation of the wording in the current draft.

2.6.32

The term 'heritage assets' should be used instead of 'cultural heritage' to ensure consistency with other NPSs.

2.6.138-148

We believe that there are elements of this section which do not substantially add anything to section 5.8 of EN-1 (in the form we have discussed with DECC). Repeating them here will not add to the protection that heritage

assets receive and may lead to confusion.. Therefore we would propose the deletion of the following paragraphs - 2.6.142; 2.6.143; 2.6.144; and 2.6.146. By covering areas already covered in EN-1 in a different way it implies that the marine historic environment should be considered in a different way to the terrestrial historic environment which is not the case.

2.6.147

A reference to historic wrecks should be included in the last sentence (in addition to discrete archaeology).

2.7.44

This paragraph states that:

‘The IPC should therefore take into account the length of time for which consent is sought when considering any indirect effect on historic environment features, such as effects on the setting of designated heritage assets.’

As the impact on the setting of a heritage asset relates directly to its significance, the impact on the setting of a heritage asset is not an ‘indirect effect’. Therefore, to ensure consistency of approach with both EN-1 and with PPS5, we suggest the following sentence to replace the above:

‘The IPC should therefore take into account the length of time for which consent is sought when considering the impact on the setting of designated heritage assets.’

d) Revised draft National Policy Statement for Gas Supply Infrastructure and Gas and Oil Pipelines (EN-4)

1.6.2

There is no reference to the findings of the SEA on the effects of the NPS on the historic environment. The implication being that it is of a lesser importance than those which are referenced.

2.13 and 2.20

We would question the logic that says there is a technologically specific impact on the landscape but not on the historic environment as there is a substantial overlap between the two impacts. This is a point which is also made in relation to other NPSs.

2.14.3

In order to be consistent with other NPSs, ‘upon features of historical environmental interest’ should be replaced with ‘on heritage assets’.

2.14.6

In order to recognise the risk to heritage assets of dredging the phrase ‘or to avoid historic environment assets and agree appropriate mitigation’ should be added at the end of the paragraph.

e) Revised draft National Policy Statement for Electricity Networks Infrastructure (EN-5)

2.8.8

We welcome the reference to the impact of placing electricity lines underground on heritage assets with an archaeological interest. We hope this reference will remain despite comments from others relating to the need to remove overground lines in environmentally sensitive areas. Each case will need to be considered on its merits and the different impacts assessed in accordance with section 5.8 of EN1.

f) Revised draft National Policy Statement for Nuclear Generation (EN-6) including the list of potentially suitable sites for the deployment of new nuclear power stations by 2025?

3.5.3 and 3.11

We would question the logic that says there is a technologically specific impact on the landscape but not on the historic environment as there is a substantial overlap between the two impacts. This is a point which is also made in relation to other NPSs.

l) Revised Appraisals of Sustainability (AoS) for EN-6

7.2.29 -7.2.33 on Cultural Heritage

The conclusion that overall the NPS will advise the IPC that there is likely to be a "minor significant negative effect on cultural resources" nationally apart from in the case of Bradwell does not in our view take full account of the destruction of archaeology on any site. In the case of Hinkley Point C, virtually all the archaeological deposits on the development site are proposed to be destroyed at a stage ahead of the IPC application being submitted. Although at this Preliminary Stage the land could be restored back to its current form if the IPC DCO is not granted in time, the loss of archaeology on the site is irreversible. This potential harm to archaeology needs to be more correctly /realistically assessed through the AoS.

It is a difficult area as there are so many unknowns but at both Hinkley and Oldbury there is a strong likelihood of archaeology of varying degrees of significance being found on the identified NPS sites and only being properly assessed after the developers have made fundamental decisions about the development and therefore being too late to properly inform the development or mitigate against its destruction.

Section 7.5.19 on Hinkley Point:

There is a lack of any mention of heritage assets under the specific section 7.5.19 on Hinkley Point. As all the other sites have a rough list of assets, it would be helpful to list certain heritage assets such as the Scheduled Monument of Wicks Barrow in the description for this site.

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