

## **National Grid Electricity Transmission (NGET) and National Grid Ventures (NGV) Stakeholder, Community and Amenity Policy consultation**

National Grid Electricity Transmission (NGET) and National Grid Ventures (NGV) are consulting on a revision to their Stakeholder, Community and Amenity Policy (SCA Policy).

Under section 38 and Schedule 9 of the Electricity Act 1989, NGET and NGV must meet their obligations to the preservation of amenity and regularly review how they manage those duties, including their consultation process. They have provided a revised Schedule 9 Statement, known as their Stakeholder, Community and Amenity Policy.

The draft 2025 version for consultation provides key updates, namely:

- A joint Schedule 9 statement between Electricity Transmission (ET) and National Grid Ventures (NGV) to reflect policy and legislative changes since the previous 2016 version.
- More references to reflect our increasing portfolio of projects in the offshore environment such as interconnectors and subsea cables.
- Updated text on effective and meaningful consultation – e.g. utilising digital tools to improve engagement.
- New sections on Biodiversity Net Gain (BNG) and ‘furthering the purpose’ of Areas of Outstanding Natural Beauty in line with new legal requirements.
- Reinforcing our approach to apply the Mitigation Hierarchy, to avoid significant harm to the environment, and where this cannot be avoided, to consider mitigation and possible compensation measures, in line with wider national policy updates.

### **Historic England Response**

The Historic Buildings and Monuments Commission for England (HBMCE), known as Historic England, is the Government’s adviser on all aspects of the historic environment in England - including historic buildings and areas, archaeology and historic landscape – and have a duty to promote public understanding and enjoyment. HBMCE are an executive Non-Departmental Public body sponsored by the Department for Culture, Media and Sport (DCMS) and we answer to Parliament through the Secretary of State for Culture, Media and Sport.

Major renewable energy infrastructure developments have the potential to affect a range of designated and non-designated heritages and their settings. As part of the regulatory process, NGET and NGV should take the UK’s regulatory planning framework into account when planning projects to ensure that heritage can be addressed as early as possible to avoid delays further along in the process.

We welcome the opportunity to respond to the consultation on the Stakeholder, Community and Amenity Policy (SCA Policy). For this response we have reproduced (in bold) the relevant sections of the consultation document and then provided our comments below.

## **Where this document applies**

**Amenity: The natural environment including biodiversity and nature (terrestrial and marine), cultural heritage, geographical or physiographical features of special interest, and landscape and visual quality. Our interpretation also includes the impact of our works on communities, such as the effects of noise and disturbance from construction.**

The inclusion of a definition of 'amenity' is to be welcomed. However, we recommend acknowledgement (perhaps in the form of a footnote?) that in this definition 'cultural heritage' encompasses the full range of the historic environment including the built and archaeological environments. The definition is used throughout the document and so it is important that NGET, NGV, stakeholders and communities understand the full extent of what is meant by 'amenity' in the context of this document. We would be happy to provide further advice and/or wording.

## **2. Involving stakeholders and communities**

**2.1 Seek to identify and understand the views and opinions of all the stakeholders and communities affected by our works.**

We suggest that statutory consultees such as Historic England, Natural England etc are mentioned specifically, and that early consultation with these consultees will be undertaken. Ensuring this happens will help to avoid delays later in the process.

## **3. Routeing networks and selecting sites**

**If we need to build new infrastructure, we will seek to avoid the following areas which are nationally or internationally designated for their landscape, wildlife or cultural significance:**

**3.2 Cultural Significance: Heritage Coasts; World Heritage Sites, Listed Buildings, Conservation Areas, Archaeological Sites, Protected Wreck Sites; Sites designated under the protection of Military Remains Act 1986; Registered Battlefields; Scheduled Monuments and Registered Parks or Gardens.**

It is worth noting that Heritage Coasts are not 'designated' in the same way as the other features listed in this paragraph. Heritage Coasts are 'defined' and agreed between a local authority and Natural England and are primarily about conserving undeveloped coastline. The reference to Registered Parks or Gardens should be changed to Registered Parks *and* Gardens.

#### **4. Minimising the effects of new infrastructure**

**4.2 We will also seek to minimise the impacts through developing new infrastructure and during construction in areas that are nationally or internationally designated for their landscape, wildlife or cultural significance as well as other sites valued for their amenity, such as listed buildings, conservation areas, areas of archaeological interest, geological or physiographical features of special interest, local wildlife sites, historic parks or gardens and historic battlefields.**

We believe this paragraph would benefit from rewording to increase clarity in the following ways;

- Designations could be listed in order of their international, national or local status. If done in this manner World Heritage Sites and Scheduled monuments should be included. It may also be beneficial to distinguish between those sites that have statutory protection e.g. listed buildings, Scheduled Monuments and those undesignated sites that are a material consideration in planning. For example, is the intention to consider all historic parks and gardens or battlefields listed on Historic Environment Records or just those that are registered?
- The current wording appears to imply those features listed e.g. listed buildings, are only valued for their amenity value (as defined earlier in the document) and disregards their wider benefits such as special architectural or historic interest.
- The paragraph seeks to 'minimise' impacts. EN-1, the Overarching National Policy Statement for Energy, refers to the mitigation hierarchy. Paragraph 4.3.4 of EN-1 states that ".any likely significant negative effects would be avoided, reduced, mitigated or compensated for, following the mitigation hierarchy". We recommend this paragraph be amended to better reflect the mitigation hierarchy and seeks first to avoid impacts, rather than minimise. Please also refer to our comments for Section 6, Applying the mitigation hierarchy as we feel greater clarity is needed across these two paragraphs.

**4.3 We will take into account the significance of these, their settings and other areas through consultation with local authorities, marine licensing authorities and other key stakeholders who have particular interests in these sites.**

Given that statutory consents will be required on projects undertaken by NGET and NGV, we recommend specific reference to statutory consultees such as Historic England, rather than the more generic 'key stakeholder who may have particular interest in these sites'.

#### **6. Applying the mitigation hierarchy**

**6.2 The Energy National Policy Statements (January 2024) apply to NSIPs but are also a material consideration under the TCPA regime. National Policy Statement EN-1**

**(Overarching National Policy Statement of Energy) sets out the general principle that new energy development is expected, in line with the mitigation hierarchy, to avoid significant harm to biodiversity and the environment, and where significant harm cannot be avoided to consider mitigation of impacts and as a last resort where possible, compensation measures.**

As currently written this paragraph appears to imply that the mitigation hierarchy only applies to biodiversity and the natural environment. We advise it is amended to include the historic environment.

As highlighted in our response to paragraph 4.2 earlier, there is currently some confusion between this paragraph and paragraph 4.2. Paragraph 4.2 refers to minimising impacts, whilst this paragraph seeks to apply the mitigation hierarchy where avoidance of impacts should be considered first. We advise further consideration is given to both paragraphs to ensure each support the other and in doing so provide greater clarity.

**6.4 Sometimes the measures we take cannot adequately mitigate against loss of amenity and we may take measures to offset the impact of our work in practical and sustainable ways, which we will develop by engaging with relevant stakeholders. Each case will be considered on its own merits.**

We suggest the inclusion of further explanation of what is meant by 'offset' in this context so this approach can be clearly distinguished from mitigation. In addition, we also suggest reference to the avoidance of harm, damage and impacts (either directly or indirectly) to enable in-situ preservation, particularly in the marine environment.

We support the approach of each case being considered on its own merits.

**6.5 Examples may include landscaping and planting works, contributing to heritage or community programmes or other benefits that deliver lasting value to the people and communities affected.**

This paragraph could potentially be interpreted as implying that a social benefit will mitigate for harm to a designated heritage asset. Heritage assets are a finite resource and are not able to be recreated elsewhere (as some natural environments can be). Expanding the paragraph to include examples of possible types of mitigation e.g. adaptation of heritage assets to new uses or improving physical access and interpretation would be helpful. It could highlight how heritage assets are able to deliver wider environmental benefits (see our response to paragraph 7.1).

## **7. Enhancing the environment around our works**

Does this mean the natural environment only, or does it include the historic environment? We advise being more explicit in what this section covers. Please also refer to our comment on paragraph 7.1.

**7.1 The decline of biodiversity in the UK is well documented and it's important that we manage the land we own in ways that create the most value for us and our stakeholders, and for the wider environment in which we operate. As we work to maintain and expand our energy networks and interconnector projects, we are making sure that we minimise the impact of our construction projects. The biodiversity crisis we find ourselves in makes this even more important. Government has set out goals for improving the environment within a generation and leaving it in a better state than we found it.**

As highlighted above, this paragraph refers to 'the wider environment' but does not detail what is meant by this. Historic environment designations such as World Heritage Sites, Scheduled Monuments, listed buildings, conservation area and Registered Parks and Gardens can also make a valuable contribution in addressing the biodiversity crisis, yet this is not referenced in here. It is essential that prior to any works being undertaken on these sites, advice is sought from Historic England. Further advice and guidance on integrating the historic environment into nature recovery can be found in Natural England's ['Nature Recovery and the Historic Environment'](#) publication. We would be pleased to advise further.

**Historic England**  
14th February 2025