

## **Planning for new energy infrastructure: 2025 revisions to National Policy Statements**

Historic England is the government's statutory adviser on all matters relating to the historic environment in England including the marine planning area. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for 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 respond to the 2025 revisions to National Policy Statements

### **Summary**

#### **Clean Power 2030**

#### **1. To what extent do you think the inclusion of Clean Power 2030 policy in EN-1 provides sufficient guidance for developers to bring forward relevant projects?**

Historic England supports the need to deliver energy projects to achieve the Government's decarbonisation and net zero targets as set out in the Clean Power 2030 Action Plan. We recognise that meeting these ambitious targets will require greater certainty for developers to attract the necessary investment and innovation. The inclusion of the Clean Power 2030 policy throughout EN-1 will assist in this and is welcomed.

Under section 4.2 of EN-1 which deals with the critical national priority for low carbon infrastructure, we are pleased to note the following in the pre-application paragraphs:

- 4.2.8 the requirement for applicants to submit preliminary environmental information at the pre-application stage to statutory consultees like Historic England is welcomed. This will allow us to understand the application and provide informed advice. Doing so at the earliest stage and including us in the list of those to be engaged helps to develop working relationships. It can also help to de-risk projects, prevent delays in the delivery of schemes and ultimately save costs, thereby helping to achieve government ambitions.
- 4.2.9 the provision for further non-statutory consultation and the requirement for mitigation to be built in from the start. Historic England works to avoid raising objections to NSIPs as a matter of course by encouraging early engagement aimed at addressing heritage implications from the outset and resolving any outstanding issues prior to Examination. This leads to better outcomes for heritage and the decarbonisation agenda and allows for a more streamlined consenting process.
- 4.2.13 the need for brevity and focus in Environmental Statements is welcomed and early engagement with Historic England and other statutory consultees can help in this regard.
- 4.2.14 the recognition of the need for the best and most accessible information for local planning authorities and statutory consultees. When provided this can help de-risk projects and speed up the process, as noted earlier.

#### **2. To what extent do you think the updates to the Critical National Priority policy help bring forward higher-quality applications?**

The introduction of the Critical National Priority policy in 2021 clearly signalled the importance that the Government attaches to developing energy infrastructure. We believe this has provided greater clarity to applicants and stakeholders.

We are concerned that paragraph 4.2.24 has been amended to include “Mitigation which results in a material reduction in generation capacity is not considered to be acceptable for CNP Infrastructure”. Given the wide types of development that are considered CNP we are concerned this could have a detrimental impact on the historic environment. Tying generation capacity to mitigation provision has the potential to result in the destruction of or damage to irreplaceable historic assets where additional generation cannot be accommodated elsewhere on the site. Unlike the natural environment, the historic environment cannot be compensated for in a similar fashion.

We note that section 4.2.20 of the draft sets out that the CNP policy *does not create an additional or cumulative need case or weighting to that which is already outlined for each type of energy infrastructure*, and that at 4.2.24 government does not wish to see loss of capacity as a result of mitigation. We welcome that para 4.2.24 falls within the section directed to the Applicant’s Assessment; it is important that the applicant takes responsibility to bring forward a scheme of sustainable development capable of delivering the planned generation capacity. On the rare occasions likely significant impacts upon the setting of designated assets are identified by us, we have consistently highlighted these to applicants at the very earliest stage, so they have ample early opportunity to ensure capacity loss is avoided in mitigation by delivery elsewhere in or in addition to the draft DCO boundaries. Further to such rare but important instances, we welcome the retention of para EN03 3.10.110 (was 3.10.109) that states that solar can cause substantial harm through setting impacts; we believe this helps assure the public of the rigorous nature of the NSIP process.

## **Onshore Wind**

### **3. Do you have comments or amendments on any aspects of the new guidance for onshore wind?**

Historic England recognises that onshore wind will have an important role to play in achieving the country’s decarbonisation ambitions. The best outcomes will be achieved through careful site selection and early engagement with key stakeholders and statutory consultees with the shared aim of securing sustainable development and good outcomes. As with any other type of renewable energy proposal, potential development sites need to be informed by an assessment of the impact which their development might have on the historic environment, underpinned by appropriate evidence, consultation with local authority heritage advisers, and with reference to robust baseline heritage data sets, to include for example, the National Heritage List for England (NHLE), and local Historic Environment Records (HERs).

## **Offshore Wind**

### **4. Do you have comments on any aspects of the updated guidance for offshore wind?**

We are pleased to see that all the attention given to the marine historic environment in the previously published NPS 1 and 3 is retained in the consultation drafts. A crucial aspect of its inclusion is to safeguard known heritage assets in the marine environment, but also to address the risk that presently unknown heritage assets can be discovered at any stage of project planning and delivery through to decommissioning. The very clear obligations that applicants are under to consult stakeholders ensures that effective project planning is designed and implemented to support decision-making processes. For editing purposes, in EN-1 there are a couple of footnotes which continue to be absent e.g. as renumbered 185 (para 5.6.11) and 205 (para 5.9.3)

## **Electricity Networks Infrastructure**

### **Endorsement of the Centralised Strategic Network Plan**

#### **5. Do you agree with the proposal in EN-5 to endorse the electricity transmission recommendations set out in the CSNP to accelerate consenting times and support the upgrade of the electricity grid?**

Historic England has engaged, and continues to do so, with NESO on the development of the CSNP. Once completed we believe the CSNP will assist in the delivery of network infrastructure. We note that the CSNP is still being developed and is not due to be published until the end of 2027. At this stage, therefore, it is difficult to understand fully the level of impact it will have. As NPSs are proposed to be reviewed on a more frequent basis than they have been to date, it may be that once the outcome of the CSNP is known, that this can then be captured as appropriate when the NPSs are reviewed.

### **Reference to the Electricity Transmission Design Principles**

#### **7. Do you agree with the proposal in EN-5 to reference the ETDP and to set out that developers should have regard to the ETDP, as relevant, in addition to the Holford and Horlock rules?**

Yes, we are positively engaged with NESO on the ETDP and welcome its role in supporting the Holford and Horlock rules within present-day strategies for design, project development and delivery.

### **Other comments**

#### **9. Do you have any comments on any aspect of the draft energy NPSs or their associated documents not covered by the previous questions?**

As noted in our previous comments, EN 3 uses a mixture of terminology. We strongly suggest that terminology is aligned with the relevant terms used and defined in the NPPF glossary. For example, 'Heritage Assets', 'Designated Heritage Assets' and the 'Historic Environment'. Regarding the term 'cultural heritage', we recognise that it has been used in the recently published marine plans (2021) and is also used in the UK Marine Policy Statement, 2011, which has same status as NPPF e.g. at paragraph 2.6.6.2. In both plans it is made clear that the historic environment represents a unique aspect of our understanding of what is meant by cultural heritage. We recommend that this is reflected in the NPS for clarity and consistency.

This will help to deliver good outcomes for the environment as a whole. This should be expressed throughout the NPS itself where relevant and specified in the Glossary. We would be happy to provide a fuller definition if that would be helpful.

Draft NPS EN-5. The third bullet of para. 2.9.26 (p.23) on undergrounding notes ‘the potentially very disruptive effects of undergrounding on local communities, habitats, archaeological and heritage assets ...’, which is comprehensive. However, the fourth bullet on subsea cables notes only ‘the potentially very disruptive effects of subsea cables on the seabed and the species that live in and on it, including physical damage to and full loss of seabed habitats’. Consequently, the fourth bullet should be amended to expressly include the potentially very disruptive effects of subsea cables on archaeological and heritage assets.

Historic England is now (via the Chartered Institute of Field Archaeologists) bringing together the solar industry, local authority archaeological officers and commercial archaeological contractors to deliver a shared approach to archaeological assessment in solar projects (within the coming weeks / months for both NSIP and TCPA). This work is moving very rapidly to a shared document that will address recent industry concerns around requirements for field evaluation / trial trenching whilst supporting sound decision making and adaptive final detailing of schemes pre and post determination.

Appraisal of Sustainability (AoS). We recommend that the baseline information includes reference to Historic Environment Records (HERs). HERs are information services that provide access to comprehensive and dynamic resources relating to the archaeology and historic built environment of a defined geographic area. They contain details on local archaeological sites and finds, historic buildings and historic landscapes and are regularly updated. This information is usually held in a database with a digital mapping system (Geographic Information System). There are over 80 HERs in England which are maintained and managed by local authorities as the essential core of their historic environment services. Whilst not currently a statutory duty, [Section 230](#) of the Levelling Up and Regeneration Act makes provision for HERs to be given a statutory status and requiring local authorities to maintain HERs. We therefore consider it appropriate for the AoS to reference HERs. More details on HERs can be found [here](#)

*Historic England*

*Policy and Evidence*

*29<sup>th</sup> May 2025*

*Submitted online via Citizen Space*