

**Planning for New Energy Infrastructure: Review of Energy National Policy  
Statements  
Historic England Consultation Response**

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 the review of energy National Policy Statements (NPSs).

This consultation response presents an overview of the main areas of interest to Historic England. It then includes a detailed, technical response to consultation questions on EN-1 to EN-5 within the appendix. As a statutory consultee, Historic England welcomes the opportunity for continued engagement in the energy NPS and NSIP review, to achieve desired outcomes for infrastructure delivery and the historic environment.

**1. Greater integration of the historic environment within environmental principles and impacts**

The energy NPSs provide the primary policy for Secretary of State decision making. Therefore, it is vital the environment is understood to encompass the natural, built, and historic environment (as defined in the National Planning Policy Framework (NPPF), paragraph 8) to ensure impacts on the historic environment are given due consideration within the NPSs and NSIP regime.

The overarching and technology specific energy NPSs (EN-1 to EN-5) focus on environmental impacts as being primarily those on the natural environment and should include those on the historic environment. Specifically:

- In line with references to enhancement of the natural environment throughout EN-1, policies should seek to preserve and enhance the historic environment, thereby reflecting the policy approach set out in the NPPF;
- There should be greater integration of historic environment matters within environmental principles (such as the matters set out in EN-1, paragraph 4.2.2) so that ‘environment’ includes the historic environment as an integral part;
- Impacts on the historic environment should be considered within sections on Landscape and Visuals. For example, EN-1 section 5.10 would benefit from due consideration of heritage assets including the contribution of setting to their significance. The inclusion of the historic environment within Landscape and Visual

Impact Assessments (LVIA) is now standard practice in Development Consent Order (DCO) applications; and

- The historic environment should form part of broader environmental considerations in the Appraisal of Sustainability (AoS), rather than being defined as part of the built environment, to allow full consideration of energy NPS policy revisions.

## **2. A consistent approach to the historic environment across infrastructure NPSs and national policy**

Historic England acknowledges the revision to the historic environment (section 5.9) in EN-1. The overarching NPS benefits from this update as the previous text related to policy and guidance from 2011. However, there is also an opportunity to align the historic environment section of the energy NPS with other infrastructure NPSs such as Geological Disposal NPS, section 5.6 (published in 2019). Our response to EN-1 in the appendix provides further detail and comments on new provisions in section 5.9.

The energy NPSs should align more closely with those in the NPPF (2021) particularly in the use of wording and terminology in Chapter 16 of the NPPF and the definitions in the NPPF glossary; as well as the UK Marine Policy Statement and the recently completed suite of Marine Plans. Historic England is happy to advise further as appropriate.

## **3. Recognition of the role of statutory consultees**

There is the need for greater clarity across the energy NPSs on the role of statutory consultees, so it is explicit within EN-1 and as appropriate whenever stakeholders are mentioned. Statutory consultee engagement is important for national designations, and mitigation of social, economic and environmental impacts.

## **4. Management and digital recording of heritage assets**

NSIP infrastructure projects can generate a large volume of archaeological resources which require appropriate management, resources and storage facilities. There is value in establishing a strategic approach within EN-1 for the management and digital recording of heritage assets at both construction and decommissioning stages of energy infrastructure projects. Such an approach contributes to public benefit and positive community engagement.

These comments set out our key considerations in response to the consultation on the revised energy NPSs. Historic England attach detailed comments on the individual energy NPSs in the appendix.

*Historic England  
29 November 2021*

## APPENDIX

### Planning for New Energy Infrastructure: Review of Energy National Policy Statements

#### Historic England: Detailed Consultation Response

**QUESTION 1a. Does the draft Overarching Energy NPS (EN-1) provide suitable information to those engaged in the process for development consent (e.g. Secretary of State, the Planning Inspectorate, applicants) for nationally significant energy infrastructure on the government’s energy and climate policy (Part 2)?**

1. In broad terms, enough detail is included in EN-1 on the government’s energy and climate policy, though clearly this is being prepared at a time when there is the possibility of further changes emerging after COP26. Presumably further consultation will be undertaken should such changes be substantive.
2. Additional detail would be welcome in the overarching statement regarding the long-term outlook for energy development, regarding:
  - a. Monitoring
  - b. Decommissioning; e.g. paragraph 2.23.16 in EN-3 refers to decommissioning. Consideration should be given to this being a provision for all NSIP proposals and not just offshore wind energy.
  - c. Re-use of materials
  - d. Restoration of land – noting that restoration (to the former land use) might not always represent the best alternative when considered against other spatial planning objectives.
3. The role of Historic England as a statutory consultee and interested party and the importance of early engagement with Historic England could be better and more explicitly highlighted throughout. For example:
  - Paragraph 4.1.9 in EN-1, amending this paragraph to include reference to the importance of early engagement with statutory consultees is recommended. The use of “stakeholders” only is ambiguous. Statutory consultees ought to be explicitly mentioned.
  - Paragraph 4.6.5 in EN-1, noting they will have helpful input into the design process to mitigate or reduce wider social, economic, and environmental impacts of proposals.

**QUESTION 1b. Does the draft Overarching Energy NPS (EN-1) provide suitable information to those engaged in the process for development consent (e.g. Secretary of State, the Planning Inspectorate, applicants) for nationally significant energy infrastructure on the need and urgency for certain types of infrastructure (Part 3)?**

4. Historic England recognises the need and urgency for certain types of infrastructure and welcome efforts taken by government to make this clear.

5. EN-1 needs to be flexible to new developments in energy generation which may not currently be under consideration in the UK. For example, there are already advanced plans for artificial island construction in the Danish sector of the North Sea to accommodate sources of renewable energy generation. Reference to “network reinforcement” and “network developments” in paragraphs 3.3.54 to 3.3.57 might be amended to accommodate consideration of new technologies/sources of renewable energy.

**QUESTION 1c. Does the draft Overarching Energy NPS (EN-1) provide suitable information to those engaged in the process for development consent (e.g. Secretary of State, the Planning Inspectorate, applicants) for nationally significant energy infrastructure to inform decision making?**

6. Paragraph 4.1.3 directs the Secretary of State (SoS), as decision maker, to weigh up adverse impacts against benefits. One of the benefits referenced are ‘ecological enhancements’, Historic England suggests this is broadened to ‘environmental enhancements’ to capture potential opportunities to conserve and enhance the historic environment.

7. We welcome the environmental, social, and economic benefits and adverse impacts in paragraph 4.1.4 being taken into account as this aligns with sustainable development considerations (as defined in NPPF paragraph 8). However, when setting out the approach for decision making paragraph 4.1.4 suggests mitigating against harm before balancing the residual effects of the energy NSIP against the benefits. We would query this in view of the Court of Appeal judgment of *City and Country Bramshill Ltd v SoS* 2021. In particular therefore when considering the historic environment, there are statutory duties to be complied with and as seen in the Bramshill case, it was not stipulated, or implied, in statute or case law that a decision-maker must undertake a "net" or "internal" balance of heritage-related benefits and harm as a self-contained exercise preceding a wider assessment.

8. Paragraph 4.1.7 refers to imposing consent requirements that are “*necessary, relevant to planning, relevant to the development to be consented, enforceable, precise, and reasonable in all other respects*”. It would therefore be helpful to clarify the role of the EIA in setting the scope and criteria which should be met by the consent requirements. This includes whether DCO conditions are predicated by what might be scoped in or out of any EIA prepared in support of an NSIP application.

9. We welcome the acknowledgement in paragraph 4.1.9 about the importance of early engagement with key stakeholders. We suggest that wording in paragraph 4.1.9 is strengthened so that early engagement is “essential” or “important and strongly encouraged” and the reference to Statutory Nature Conservation Bodies is amended to Statutory Consultees, to include Historic England.

10. Historic England is encouraged by the references to design in paragraph 4.1.10. In addition to the National Infrastructure Commission’s Design Principles for National Infrastructure, we would also suggest aligning with national guidance by also referencing the National Design Guide and National Model Design Code. This would help achieve consistent understanding of good design and place-shaping.

11. With regard to paragraph 4.2.13 – in particular the fourth bullet point (when differentiating between sites with similar outcomes), it would be helpful to emphasise the importance of justification in site selection (to inform decision making and the grounds for discounting of alternatives) as well as the extent to which the irreplaceable nature of heritage assets is considered in any assessment of alternatives.

12. We welcome the further points of detail in paragraphs 5.9.17 - 5.9.29 as the basis for decision making on matters relevant to the historic environment. This includes the addition of paragraph 5.9.23 which directs the SoS to “*give considerable importance and weight to the desirability of preserving all designated heritage assets...*” and the approach to the setting of designated heritage assets in paragraph 5.9.29 where the SoS “*should give considerable importance and weight to the desirability of preserving the setting of such assets...*” Historic England notes that those aspects of the setting which make a positive contribution should be preserved; and if they are neutral or negative, the extent to which they can be enhanced. Furthermore, where loss of the significance of a heritage asset has been justified, the requirement or obligation that prevents the loss occurring until the development has commenced is an omission which should be included within these paragraphs. This will align EN-1 with other NPS such as Geological Disposal (paragraph 5.6.19) and prevent works which impact designated assets taking place too early and without the certainty that a proposed scheme will commence.

**QUESTION 1d. Does the draft Overarching Energy NPS (EN-1) provide suitable information to those engaged in the process for development consent (e.g. Secretary of State, the Planning Inspectorate, applicants) for nationally significant energy infrastructure to inform examinations?**

13. In the consideration of options at examination there has been a recent court judgment, *Save Stonehenge WHS Ltd v SoST 2021*, which considered the issue around alternatives which may be of assistance.

14. It is Historic England’s experience that the more detail that can be provided at an early stage the better the understanding of a proposal and its impact, and parameters can then be set with greater confidence. Historic England welcomes confirmation of this approach in EN-1, paragraph 4.1.9 as early engagement and ongoing collaboration offers opportunity for influence and potential resolution of issues prior to the examination stage.

15. Historic England considers EN-1 could place greater emphasis on a proportionate approach to the level of information submitted for examination. There is inherent tension between an approach from an applicant that seeks the minimum of obligations that would

require further information post-determination of the DCO while at the same time looking to minimise information pre-determination as part of the DCO submission. An appropriate level of detail is needed at the application stage, as set out in EN-1 paragraph 5.9.13, to inform the decision (and reduce the amount of post-determination obligations). Historic England also understands the need for a degree of flexibility and the role of statutory consultees to continue engagement and offer advice at the post-consenting stage.

16. Further emphasis could be placed on suitable information being in sufficient detail to assess the risk of hitherto unknown heritage assets being present, especially in marine areas. As the UK Marine Policy Statement acknowledges (note 55, p. 22), the existence and/or location of many heritage assets are often unknown prior to investigation preceding development as part of an archaeological assessment.

**QUESTION 2. Do you agree with the amendments made to EN-1 Part 4 on assessment principles, including new guidance on the marine environment, and biodiversity and net gain?**

17. Paragraph 4.2.6 refers to circumstances when some details of an NSIP have yet to be finalised and, with reference to footnote 57, use of the “Rochdale Envelope”. For support implementation of this approach, it would be helpful in this paragraph also to refer to the advice note published by the Planning Inspectorate on use of the Rochdale Envelope: <https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/>

18. We recommend, with reference to paragraph 4.4.5, that applicants be required rather than encouraged to refer to Marine plans at an early stage.

19. The design principles set out in 4.6 are helpful and are supported by Historic England.

20. We welcome the reference in paragraph 4.6.4 to the need for applicants to appraise various design options and to explain why options were discounted in favour of the design put forward. We recommend a minor amendment to paragraph 4.6.4, which refers to landscape and environmental impacts, addressing a risk that this could be (incorrectly) interpreted as relating only to the natural environment: “...*Many of the wider impacts of a development, such as impacts on the natural environment and historic environment landscape and environmental impacts, will be important factors in the design process...*”

21. Paragraph 4.11.6 states that “...*the MMO will advise on what conditions should apply to the deemed marine licence*”. It would be helpful if the applicant is also required to submit details regarding preparation of a draft Deemed Marine Licence as part of a draft DCO e.g. highlighting possible/required conditions at Preliminary Environmental Information Report consultation stage.

**QUESTION 3. Do you agree with the amendments made to EN-1 Part 5 on the generic impacts of new energy infrastructure?**

22. Paragraph 5.4.3 states that: “*The applicant should provide environmental information proportionate to the infrastructure where EIA is not required to help the Secretary of State consider thoroughly the potential effects of a proposed project*”. It would be helpful to identify any such examples of an NSIP that does not require EIA.

23. Paragraph 5.4.10 refers to footnote 86 (which in turn references paragraph 4.2.8), which states that the term ‘harm’ should be understood to mean ‘significant harm’. This has the potential to impact on how an examination authority considers impacts on heritage assets. There needs to be consideration of how this can be read across to other policies (e.g. for the historic environment) to ensure that there are no unintended consequences.

24. Paragraph 5.6.4 acknowledges potential impacts on marine biodiversity. It is also possible that “*indirect changes to the coastline and seabed*” could result in exposure of either known or to date unknown heritage assets or indeed the burial of heritage assets. This should be included in paragraph 5.6.4.

25. Paragraph 5.6.6: it is important that coastal geomorphological and sediment transfer modelling is designed so that model boundaries reflect the geography within which the development is proposed and thereby pay close attention to possible changes as could occur close to the proposed development.

26. A bullet point should be added to paragraph 5.6.7 to cover the risk of encountering presently unknown heritage assets, based on information held by local planning authorities.

27. It would be helpful to include reference to Historic England in paragraph 5.6.8, as early engagement with Historic England can help to identify any issues that it would be beneficial to resolve at an early stage rather than being potentially problematic if left to a later stage.

28. Paragraph 5.6.15 mentions that the SoS must “*...have regard to the appropriate marine policy documents, as provided for in the Marine and Coastal Access Act 2009*”. In the 2009 Act, according to s.59, for England, this would appear to be Marine Plans published by the MMO.

29. Paragraphs 5.9.5-5.9.7 includes several small but significant changes to the text that included in EN-1 (2011) and which now would deviate from that in the NPPF (2021). Historic England recommends the wording on this issue from the current EN-1 be carried forward unamended.

30. With regard to paragraphs 5.9.10 and 5.9.13, while applicants must assess heritage impacts within an EIA there will be instances where more detailed heritage specific assessments and statements will be needed, such as Heritage Impact Assessments. This is particularly crucial for World Heritage Sites (WHSs). For example, the Operational

Guidelines for the Implementation of the World Heritage Convention (2019) stress the importance of Heritage Impact Assessment, noting at paragraph 118 that these should be a pre-requisite for development projects and activities that are planned for implementation within or around a World Heritage property. Section 5 would be improved by referring to these requirements.

31. Historic England proposes the following line be added to paragraph 5.9.11:

*“As part of the ES the applicant should provide a description of the significance of the heritage assets affected by the proposed development, including any contribution made by their setting. The level of detail should be proportionate to the importance of the heritage assets and no more than is sufficient to understand the potential impact of the proposal on their significance. Consideration will also need to be given to the possible impacts, including cumulative, on the wider historic environment. As a minimum the applicant should have consulted the relevant Historic Environment Record (or, where the development is in English or Welsh waters, Historic England or Cadw) and assessed the heritage assets themselves using expertise where necessary according to the proposed development’s impact.”*

32. Footnote 105 states that: *“English Heritage and Cadw hold additional information about heritage assets in English or Welsh waters.”* Reference to English Heritage requires amendment to Historic England.

33. Paragraph 5.9.22: we suggest a minor modification to the wording, as follows:

*“Substantial harm to or loss of significance of a grade II ~~listed building park or garden~~ Listed Building or a grade II Registered Park or Garden should be exceptional.”*

34. Paragraph 5.9.32: the text in this paragraph needs to be amended to reflect the requirement to consult with Historic England more generally rather than limiting engagement to the development in English waters. Note also there is a legally defined (UK) marine area within which renewable energy projects can be undertaken and appropriate recognition should be given to the English Inshore and Offshore Marine Plan Areas (as provided by the Marine and Coastal Access Act 2009).

35. Paragraph 5.9.33: it is unclear what is meant in the second bullet point about *“enter into an obligation”* as separate to any *“...requirement in the development consent order”* in the first bullet point. It is also unclear how any *“obligation”* be given legal effect if it’s not in a DCO.

36. Also with regard to paragraph 5.9.33: the focus for attention here is on *“...assets discovered during construction”* (this text is copied from July 2011 EN-1), but the draft EN-3 in new sections 2.53.3 and 2.53.4 includes requirement to conduct proportionate trial trenching for archaeological purposes which will occur prior to construction. Therefore, the text of 5.9.33 should be amended to determine the presence of presently unknown heritage assets before commencement of construction.



37. Section 5.10 focuses on Landscape and Visual; however, this does not include appropriate consideration of the historic environment. In particular due consideration should be given to the setting of heritage assets (see [The Setting of Heritage Assets](#)). The text does not refer to designated or non-designated assets or historic receptors. Nor does it reflect their role in landscape development or the need to assess these as part of LVIA - now standard practice in DCO applications. Both our historic landscapes and Heritage Coasts owe their character to a combination of factors, which bring together the historic and natural environment, and this should be reflected in the approach taken to any assessment of their capacity to accommodate change.

38. Paragraph 5.10.02: refers to “...cooling towers and exhaust stacks and their plumes have the most obvious impact on landscape and visual amenity for thermal combustion generating stations” (see also footnote 111), copied directly from paragraph 5.9.2 in July 2011 EN-1. This section should be revised to reflect the reality of the energy generating facilities as relevant for inclusion now in EN-1; for example, paragraphs 2.2.2 and 2.2.8 in draft EN-2 briefly refer to natural gas generating station design. Also, offshore Wind Turbine Generators are being designed and tested up to 280m tall (to blade tip height).

39. In paragraph 5.10.9 it is helpful to see the following stated: “...capacity to accommodate change” which is a key aspect of Historic Landscape Characterisation (HLC) and Historic Seascape Characterisation (HSC). However, the chapter in an Environmental Statement on landscape/seascape impact will focus on people as the receptor (as stated in 5.10.20) and what might be seen from certain viewpoints. Given HLC/HSC is primarily seen as setting the context within which the historic environment is perceived (including unseen elements), section 5.9 should be expanded to include consideration of HLC/HSC.

40. The subsection on nationally designated landscapes should include consideration of the historic environment when assessing the impact of an NSIP on the setting of heritage assets (for example) and with regard to impacts of a proposal on designated heritage assets such as World Heritage Sites and Registered Parks and Gardens.

41. In paragraph 5.11.2, the role that green infrastructure has to play in helping to enhance or improve the significance and setting of heritage assets could be referenced to strengthen its importance.

42. Paragraph 5.12 focuses on noise and vibration, both of which have the potential to have an adverse impact on the historic environment. This might include structural damage through vibration, particularly heritage at risk (e.g. referring to Historic England’s [Heritage at Risk Register](#)), or noise adversely affecting the significance of the heritage asset. Examples of factors that will determine the likely noise impact are included in 5.12.3, but these do not include specific consideration of the historic environment.

43. NSIP infrastructure projects can potentially generate large archaeological archives that have the potential to overwhelm storage capacity in local museums, where the physical archives would be deposited. Historic England ask that consideration be given to this issue in drafting these energy NPSs, justified in terms of sustainability and a lack of

capacity to provide public benefit. If a requirement to develop archive capacity is written into national policy (e.g. in EN1 section 5.9.14) it would deliver significant public benefits to the wider sector. This would help to address socio-economic impacts from the NSIP (highlighted in paragraphs 5.13.1 and 5.13.3) and could be accounted for in the Environmental Statement (paragraph 5.13.2). In terms of digital material, we recommend inclusion of a requirement for that material to go to a Trusted Digital Repository.

**QUESTION 5. Do you agree that the amendments to EN-2 (in combination with EN-1) provide clear planning policy to support the government’s position on the use of fossil fuels in electricity generation and the phase out of coal and large-scale oil?**

44. Paragraph 1.3.1 mentions how it should be read in conjunction with (draft) EN-1 which covers “high level objectives”. Draft EN-1 does not use the term “high level objectives” so it is unclear and open to interpretation what is being referenced.

**QUESTION 7. Do you have any other comments on the amendments to EN-2?**

45. In paragraph 2.2 factors influencing site selection by developers, we recommend the inclusion of environmental sensitivity as an additional factor. Set in this context, environmental sensitivity should be broader than historic environment, and is not seen as barrier or constraint, but simply a consideration regarding impact e.g. protected habitats, designated landscapes, and the historic environment.

46. We are concerned by the lack of reference to the historic environment in section 2.4. This section cross-refers to relevant generic impacts considered in EN-1; however, the lack of specific reference to the historic environment in this section of EN-2 contrasts with the significant impact that such facilities can have on our heritage. As a minimum, we recommend that the section 2.6 on landscape and visual impact be broadened to include also the impact of such facilities on the setting of heritage assets and on our historic landscapes (also refer to [The Setting of Heritage Assets](#)). Furthermore, reference to landscape and visual impact is inadequate without some consideration of the layout and design of modern electricity generating stations using natural gas.

47. Paragraph 2.6.2 does mention “cooling towers” but more attention is needed here to be relevant to modern designs and technology used.

48. Paragraph 2.6.4 only mentions “visual impact of the stack” and no mention of cooling towers.

49. Paragraph 2.6.5 begins by stating that it is not possible to eliminate the visual impacts associated with a natural gas electricity generating station. However, EN-1 makes clear the importance of avoiding impacts before mitigation is considered – not only with regard to designated areas, but also areas outside nationally designated areas that might affect them (see paragraph 5.10.14). Consequently, Historic England proposes a minor clarification at the start of paragraph 2.6.5 as follows:

*“It is not possible to eliminate the visual impacts associated with a natural gas electricity generating station, after a site has been selected in accordance with national policy (in particular EN-1). Mitigation is therefore needed to reduce the visual intrusion of the buildings in the landscape and minimise impact on visual amenity as far as reasonably practicable.”*

50. With regard to paragraph 2.8.1, hydrological impacts can cause changes to the groundwater level which in turn can affect the preservation of waterlogged archaeological remains. Such impacts should also be referenced in the bulleted list in paragraph 2.8.1.

**QUESTION 8. Do you agree that the amendments to EN-3 (in combination with EN-1) provide clear planning policy to support the government’s position on renewable energy infrastructure?**

51. Historic England notes inclusion of large-scale PV (>50MW) in the suite of technologies covered by this NPS within the NSIP regime and welcomes the additional clarity that should follow in the decision-making process.

52. Historic England recommends a minor amendment to paragraph 2.4 as follows: *“Proposals for renewable energy infrastructure should demonstrate good design in respect of landscape and visual amenity, and in the design of the project to mitigate impacts such as noise and effects on ecology and heritage”*.

53. Paragraphs 2.12.3 and 2.22.21 refer to ‘sites with nationally recognised designations (SSSIs, National Nature Reserves, National Parks, the Broads, Areas of Outstanding Natural Beauty, Heritage Coasts, Registered Parks and Gardens and Marine Conservation Zones)’. This is an incomplete list of designated heritage assets, we recommend the use of designated heritage assets consistent with other NPSs, or an indication that this list is not exclusive (i.e. that it is examples of designated asset types and should be prefaced with “such as”).

54. With regard to paragraph 2.19.1, hydrological impacts can cause changes to the groundwater level which in turn can affect the preservation of waterlogged archaeological remains. Such impacts should also be referenced in the bulleted list in paragraph 2.19.1.

55. Reference should also be made to consideration of impacts on non-designated heritage assets in the preceding paragraphs on site selection. This might include an additional paragraph 2.22.29 as follows: *“Whilst it might be possible for a development project to avoid designated heritage assets, the knowledge currently available about the historic environment in the inshore and offshore areas is poorly defined. A key requirement is to determine how any known heritage assets might best be avoided. The applicant will be expected to conduct all necessary examination and assessment exercises using a variety of survey techniques to plan the development so as to optimise opportunities for avoidance. Once a site has been chosen, it may be necessary to undertake further archaeological assessment, including field evaluation, to identify as yet unknown heritage assets when*

*considering the options for detailed site development, which may also include ancillary matters, such as those described in EN-1.”*

56. The role of statutory consultees would benefit from greater clarity in EN-3. For example: in paragraphs 2.12.3 and 2.22.21 (acknowledging the importance of liaison with statutory consultees regarding national designations paragraph) and 2.21.6 (acknowledging the value of liaison with statutory consultees as well as with the MMO).

### **QUESTION 9. Do you agree with the amendments made to EN-3 guidance on offshore wind?**

57. Paragraph 2.23.6: Historic England suggests amending the fourth bullet point to “*...turbine blade tip height...*”.

58. Historic England notes the applicability of using the ‘Rochdale Envelope’ as referred to in paragraph 2.23.7. The primary reason for using the Rochdale Envelope (or ‘Design Envelope’) approach is to take account of impact uncertainties through an assessment on a worst-case scenario for the design of the proposed project on different environmental receptors. However, this paragraph seems to accept its use so that the Applicant has “*...some flexibility*” in the consent... “*and the precise details are not known...*” It is therefore important for this NPS to explain how an applicant may use the Rochdale Envelope and if it is acceptable for the focus to be towards maintaining economic flexibility rather than environmental uncertainties.

59. Paragraph 2.23.8: reference to avoidance of previously unknown archaeological materials through “micrositing/microrouting” is welcomed and is a direct copy from EN-3 (July 2011, para 2.6.44). However, given engineering scale of new offshore wind farm developments, foundation designs and anchor arrays, as will be needed for floating offshore wind in deeper water, it will be interesting to see what (engineering) tolerance there is for micrositing/microrouting especially considering the statement “*...preferable to leave in situ.*” used in this paragraph. Furthermore, we recommend that the following is included here: “*to inform the micrositing/microrouting it is relevant that the necessary high-resolution survey work is completed and that provision is made for investigative work such as archaeological examination to assess the impacts of any proposed cables or foundation placement on potential archaeological assets*”. Historic England considers the matter raised here complements the similar point made in paragraph 2.53.4.

60. Adapting relevant text from the [Historic England Advice Note on commercial renewable energy development and the historic environment](#), a recommended additional paragraph to EN-3 (potentially as new paragraph 2.23.8 in the section on flexibility in the project details) reads follows:

*“In situations when an applicant uses the ‘Rochdale Envelope’ when preparing a DCO submission, it is likely that detailed survey campaigns will be required post-consent to assist selection of the optimum engineering design. It is therefore important that an archaeological*

*Written Scheme of Investigation (WSI) is also prepared in outline as part of the DCO submission with a commitment included in the DCO for a project-specific WSI to be produced post-consent in consultation with Historic England as statutory consultee.”*

61. Paragraph 2.23.9: Historic England seeks clarification if using the example provided (“*feature to avoid must not cover the full width of the assessed cable corridor*”) means that micro-siting/micro-routing is not valid if avoidance means going outside of a defined development corridor.

62. Paragraph 2.23.14 states that: “*In determining an application for the repowering of a site, the proposed replacement scheme should be determined by the Secretary of State on its individual merits.*” Further detail on how this determination would be made (in particular the key principles to be followed or reference documents to be referenced) would be helpful.

63. A key aspect of monitoring is so that the Consent Holder can demonstrate that any agreed Archaeological Exclusion Zones have been avoided during construction and during subsequent Operation & Maintenance phase. We recommend the following minor amendment to paragraph 2.23.15: “*Owing to the complex nature of offshore wind development, and the difficulty in establishing the evidence base for marine environmental recovery the Secretary of State should, where appropriate, require the applicant to undertake environmental monitoring (e.g., ornithological surveys, geomorphological surveys, archaeological surveys) prior to and during construction and operation. Monitoring will measure and document the effects of the development and the efficacy of any associated mitigation or compensation. This enables an assessment of the accuracy of the original predictions and improves the evidence base for future mitigation and compensation measures enabling better decision-making in future EIAs and HRAs. The Secretary of State may consider that monitoring of any impact is appropriate. Monitoring should be presented in formal reports which must be made publicly available.*”

64. Paragraph 2.25.1 recognises marine archaeology, which is welcome, but Historic England queries omission of reference to the onshore connection point which can also affect the physical historic environment.

65. In paragraph 2.32.4 reference is made to the relevant statutory consultees. It would be helpful for this to include explicit reference to Historic England for the sake of additional clarity. Also, this paragraph refers to the offshore renewables protocol for archaeological discoveries. Note that Historic England has also published relevant advice: [Commercial Renewable Energy Development and the Historic Environment HEAN15](#).

66. Regarding section 2.35 on seascape and visual effects, in practice Historic England has an important role regarding World Heritage Sites, including provision of advice to DCMS (as the competent government department under the UNESCO Convention). In situations which involve WHSs where the Outstanding Universal Value is related to the natural environment (e.g. the Jurassic Coast WHS) then Historic England coordinates matters with DCMS, the NSIP Examination Authority and Statutory Nature Conservation Bodies which have primary responsibility for landscape designation management. Noting

this, Historic England suggests a minor amendment to paragraph 2.35.5 as follows this potential area of dialogue and common interest:

*“Where necessary, assessment of the seascape should include an assessment of four principal considerations on the likely effect of offshore wind farms on the coast:*

- *the limit of visual perception from the coast under poor, good and best lightening conditions*
- *the effects of navigation and hazard prevention lighting on dark night skies*
- *individual landscape and visual characteristics of the coast and the special qualities of designated landscapes, such as World Heritage Sites, which limits the coasts capacity to absorb a development*
- *how people perceive and interact with the coast and seascape*

#### **QUESTION 10. Do you agree with the new guidance added to EN-3 on pumped hydro storage?**

67. The section on pumped hydro storage does not include a subsection on the historic environment. Some aspects will be covered through relevant landscape and visual assessment; however, it would be a significant omission not to recognise and assess potential impacts on the historic environment, which might include (for example) impacts on scheduled monuments, impacts on nationally important archaeological remains and impacts on the setting of designated heritage assets.

68. The potential impact on archaeology and hillforts, including Scheduled Monuments, should be recognised in paragraph 2.39.6.

69. Paragraph 2.41.3 states: *“In sites with nationally recognised designations (SSSIs, National Nature Reserves, National Parks, the Broads, Areas of Outstanding Natural Beauty, Registered Parks and Gardens, and Marine Conservation Zone)”*. Historic England is unclear about the rationale for how the historic environment is referenced here. Alignment with other national policy in the NPPF is recommended, for example, World Heritage Sites such as the Lake District.

#### **QUESTION 11. Do you agree with the new guidance added to EN-3 on solar PV?**

70. Focusing on section 2.53, drawing from [Historic England Advice Note on commercial renewable energy development](#), assessment of potential heritage impacts of a solar park will typically cover groundworks, such as those from the supports for the solar panels, cable trenches and hard-standings for access or equipment. Mitigation may be possible; for example, the use of concrete bases for the panels, which entail less ground disturbance. [Planning guidance](#) published by BRE supported by Cornwall Council notes that: *“Where possible Solar PV arrays should be installed using ‘pile’ driven or screw foundations, or pre-moulded concrete blocks (shoes), and capable of easy removal. The use of shoes may be required for archaeological sensitive areas.”* The vehicles and equipment

used during construction can also damage archaeological remains. Historic England suggests the following proposed addition to paragraph 2.53.2: *“Equally archaeological finds may be protected by a solar PV farm as the site is removed from regular ploughing and shoes or low-level piling is stipulated. The results of pre-determination archaeological evaluation inform the design of the scheme and related archaeological planning conditions.”*

71. The inclusion of paragraph 2.53.4 is welcomed as it clearly explains the importance and relevance of conducting investigative field work and survey as part of the assessment process that supports production of an Environmental Statement. The corroboration that this enables between desk-based sources of information and dedicated investigations provides the appropriate means to assess risk and for suitable and appropriate design changes to be considered and where necessary adopted as part of the project submission.

72. In cases where solar parks are proposed on previously developed land, it should not be assumed that such sites are devoid of heritage interest. For example, former airfields may contain heritage assets which are not readily apparent or previously recorded, and it is important that assessment of these sites in relation to the historic environment is as rigorous as it would be for other land use types. We would welcome recognition of this point in the subsection on the applicant’s assessment e.g. as a new paragraph 2.53.6.

73. With regard to mitigation in 2.53.6, harmful visual impacts on the settings of heritage assets can be avoided or reduced through sensitive design and layout, and mitigation measures such as tree and hedge planting to screen the development. However, care needs to be taken that these measures do not themselves have an adverse impact on the heritage setting or landscape character.

#### **QUESTION 12. Do you agree with the new guidance added to EN-3 on tidal stream energy?**

74. Historic England acknowledges that tidal stream energy is an emerging technology and renewable energy from tidal array sources is likely to increase over the next decade. Whilst there is uncertainty over design and potential impact, Historic England considers directing applicants to matters relating to offshore wind is appropriate. Information in Historic England’s [Guidance on Wave and Tidal Energy](#) may also be of use to inform the policy position in the NPS.

75. There is the opportunity to introduce further considerations regarding the historic environment in EN-3, section 2.55 on tidal stream energy:

- Paragraph 2.55.4 refers to environmental and ecological impacts, it is relevant to extend this to the historic environment to take account of potential impact on offshore marine heritage and onshore heritage assets.
- Paragraphs 2.56.2 - 2.56.7 set out arrangements for marine licences including liaison with the Marine Management Organisation. Extending the reference

Statutory Consultees would ensure Historic England are engaged in all relevant offshore and onshore historic environment matters.

- Historic England supports further collection of data under the research project relating to offshore SEA (paragraph 2.57.3) and would welcome the inclusion of historic environment considerations within the scope of research to better understand impacts from tidal stream energy. Historic England would also welcome further discussion on the scope and findings from the research.
- In terms of design, tidal arrays are likely to include anchored fixed points on the seabed. Historic England welcomes the reference to marine heritage assets in paragraph 2.57.8 and would support an additional reference to early-stage archaeological assessments, including marine investigations. This is already referenced in paragraph 2.58.9 as necessary to support micro-siting of elements of the proposed tidal array.
- Paragraph 2.6.1 states there is insufficient evidence to understand other impacts such as the historic environment and directs the applicant to offshore wind impacts which are likely to share most characteristics. Historic England considers an initial view on potential impact from offshore and onshore tidal stream energy infrastructure would be appropriate to take account of marine heritage and heritage assets located onshore. Historic England also welcomes further monitoring to better understand the impacts of this emerging technology.

76. The approach set out in EN-3, paragraph 2.58.8 for the EIA to take account of the maximum adverse case scenario seems reasonable when considering details of the tidal array including technology and design may be unknown. Historic England would welcome an approach that assesses the impact of proposals on the marine and terrestrial historic environment along corridors where fixings, cables and sub-stations may be sited.

77. Paragraphs 2.58.15 and 2.58.16 cover the requirement for a decommissioning programme. It would be beneficial to indicate the scope of the programme including restoration of heritage assets which have been subject to temporary or long-term impacts at operational and decommissioning stages.

78. Section 2.59 on Impact Assessment Principles for tidal energy considers impact on Green Belts (paragraph 2.59.2). This could be extended to other sensitive locations such as landscape and heritage designations including National Parks, Areas of Outstanding Natural Beauty, World Heritage Sites and Conservation Areas. Onshore sub-stations and associated infrastructure such as cabling may impact the significance of such heritage assets and historic landscapes.

#### **QUESTION 14. Do you have any other comments on the amendments to EN-3?**

79. It is noted that onshore wind power will be included in the next allocation round of 'Contracts for Difference for Low Carbon Electricity Generation', and that when taken alongside solar PV (also added to the next allocation round) the government anticipates a



‘larger number of applications than in previous allocation rounds’ (p4 - [Contracts for Difference for Low Carbon Electricity Generation: Consultation on further drafting amendments to the CfD contract for Allocation Round 4 \(publishing.service.gov.uk\)](#)). It is, however, less clear about the implications for the future development of onshore wind power development in the current mix of government policy and support, which makes future planning and related research more difficult.

80. With regard to biomass plant, as stated in the Historic England Advice Note on [commercial renewable energy development and the historic environment](#), although planning consent is not needed for farming operations, it is helpful if biomass plant applications are informed by a desk-based resource assessment within the plant’s catchment area, which includes consideration of the area’s landscape character and archaeological potential. This exercise is helpful not only because of the potentially significant landscape and archaeological impacts of large-scale energy crop cultivation, but also because of the ‘knock-on’ effects which any major constraints that are identified could have on travel patterns associated with fuel supply. Furthermore, large-scale energy crop plantations also have the potential to harm the setting of historic sites and compromise the visual amenity of the wider landscape, detracting from historic character and sense of place. Historic England recommends inclusion of these considerations in EN-3.

**QUESTION 15. Do you agree that the amendments to EN-4 (in combination with EN-1) provide clear planning policy to support the government’s position on gas supply infrastructure and gas and oil pipelines?**

81. References to the historic environment could be strengthened in parts of EN-4 to ensure appropriate impact assessment. For example, paragraph 1.7.4 refers to landscape and townscape, and the historic environment could be considered more broadly within this context, as historic landscapes and townscapes are key aspects that contribute to the character and special value of places. In particular due consideration should be given to the setting of heritage assets (see [The Setting of Heritage Assets](#)). The text does not refer to designated or non-designated assets or historic receptors. Nor does it reflect their role in landscape development or the need to assess these as part of LVIA - now standard practice in DCO applications. Historic places and landscapes and Heritage Coasts owe their character to a combination of factors, which bring together the historic and natural environment, and this should be reflected in the approach taken to any assessment of their capacity to accommodate change.

82. Historic England welcomes the reference to the potential for adverse impacts on heritage assets in paragraph 2.15.3, in relation to dredging. Additional details on historic environment impacts would be supported including:

- Heritage assets being added to the list of generic impacts considered at the start of section 2.15;

- Alignment with the Ports NPS as this has similar impacts on marine heritage as dredging associated with LNG; and
- Amendment of paragraph 2.15.8 to recognise other (non-designated) heritage assets being subject to the same policy position as designated assets until demonstrated otherwise (see UK Marine Policy Statement paragraph 2.6.6.5).

83. The section on dredging for LNG facilities should take account of the risk of encountering presently unknown elements of the historic environment and enable appropriate action regarding known heritage assets located in an area that is therefore incompatible with required dredging objectives. The inclusion of designated and non-designated historic environment matters in this section will make it consistent with how risks are considered elsewhere in EN-4.

84. Sections 2.19 and 2.20 on pipelines would benefit from an extended policy to take account of potential archaeology and specify the need for an appropriate level of archaeological assessment in order to avoid unintended consequences for the historic environment. A review of terminology in paragraph 2.19.9 would be supported – changing the ‘desk-top surveys’ reference to ‘Desk Based Assessment’ (DBA) to avoid confusion with field / marine surveys used to reveal sites and areas of archaeological importance, and data acquisition used to corroborate the DBA. We note the same terminology is used in paragraph 2.32.2 and should be amended to ‘Desk Based Assessment’.

85. There is an incorrect reference in paragraph 2.21.1 to the sections in EN-1 relating to biodiversity and landscape assessments. Historic England notes the current reference to section 5.9 refers to the historic environment and its inclusion in EN-4 would be supported alongside the biodiversity and landscape references.

86. In relation to gas and oil pipelines, we consider the requirement for boreholes is a necessity due to the pipelines being located underground. Therefore, amending the current emphasis from ‘may find it necessary to sink new boreholes’ to applicants ‘will need to sink new boreholes’ would be welcomed. The use of borehole, along with information gained from conducting geotechnical investigations for pipelines (in paragraph 2.23.7) will allow a consistent approach across the NPS and a comprehensive means of assessing potential impacts on the significance of the historic environment.

**QUESTION 18. Do you agree that the amendments to EN-5 (in combination with EN-1) provide clear planning policy to support the government’s position on electricity networks infrastructure?**

87. Paragraph 2.2.4 refers to “*a degree of flexibility in the location of the development’s associated substations...*” but with the focus on landscape aesthetics, it is equally relevant to consider the historic landscape and the potential to encounter presently unknown archaeological sites. In order to achieve a degree of flexibility, we recommend reference to an EIA which considers the maximum adverse case scenario within a sub-station search

area. This enables a comprehensive understanding of siting and design measures to avoid or mitigate impacts on the historic environment.

88. Paragraph 2.2.5 refers to Section 9 of Electricity Act 1989 - and mentions this section of the act states that due regard should be given to “*conserving... and of protecting sites, buildings and objects of architectural, historic or archaeological interest; and ...do what [they] reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects*”. While the section refers to the original wording in the act, there is an opportunity to use up-to-date terminology in EN-5, which aligns with the NPPF and Planning Practice Guidance (PPG) e.g. this could simply be “*conserving... and of protecting the historic environment*”.

89. Paragraphs 2.5.1 and 2.5.2: Historic England welcomes the need for co-ordinated network planning for offshore transmission and by applicants.

90. Paragraph 2.5.4 consideration of what comprises “*enhancements to the environment post construction*” should be expanded to include knowledge and understanding about the environment within which the development is occurring (terrestrial or marine). It is therefore equally relevant to state how enhancement can be achieved through the applicant demonstrating and committing resources to local authority services that support access to environmental information e.g. local maintained and managed archives for recovered archaeological materials.

91. Section 2.9 (Impacts of electricity networks) does not mention the historic environment or recognise potential related issues- this is one of the key chapters in EN-5. Historic England recommends that the historic environment is suitably referenced in this section. This could begin with a paragraph on heritage in the early part of the text and new bullet for heritage at 2.9, then a section of its own following a similar pattern to the biodiversity and landscape sections (see 2.10 and 2.11, respectively). For example, this could cover:

- 1) Introduction (refer to general heritage policies in EN-1) and stating that electricity networks infrastructure proposals pose a particular risk to designated and non-designated heritage assets. Physical impacts from construction and harm to the significance of designated assets through development within their setting (with a reference to [The Setting of Heritage Assets](#)).
- 2) Applicant’s Assessment stating that the Applicant will need to consider effects on designated and non-designated heritage assets and take these into consideration in the preparation of the Environmental Statement. Particular consideration should be given to avoidance of direct impacts, and setting impacts need to be considered as part of the site selection for above and below ground cables, overhead wires and substation infrastructure.
- 3) Mitigation consideration given to siting overhead line away from designated heritage assets and historic landscapes and careful consideration of setting in

decision making, plus careful consideration of mitigation planting to avoid additional harm

4) Decision Making - The SoS should ensure that this issue has been considered.

92. Section 2.11 focuses on Landscape and Visual; however, this does not include appropriate consideration of the historic environment. In particular due consideration should be given to the setting of heritage assets (see [The Setting of Heritage Assets](#)). The text does not refer to designated or non-designated assets or historic receptors. Nor does it reflect their role in landscape development or the need to assess these as part of LVIA - now standard practice in DCO applications. Our historic landscapes and Heritage Coasts owe their character to a combination of factors, which bring together the historic and natural environment, and this should be reflected in the approach taken to any assessment of their capacity to accommodate change.

93. Paragraphs 2.11.2 and 2.11.3: overhead line infrastructure and substations are also likely to have significant impacts on heritage receptors and this should be acknowledged in the text.

94. Paragraph 2.11.4: cumulative impacts can include multiple impacts on a range of heritage receptors and historic landscapes.

95. Paragraph 2.11.5: any compensatory mitigation would need to ensure or take into consideration additional or contra impacts e.g. harmful effects on the setting of heritage assets and physical impacts on heritage assets

96. Paragraph 2.11.6: reference to national designations, refers only to natural environment designations. With regard to the historic environment, some World Heritage Sites in the UK are located in rural areas and these networks would have an impact on them, so careful consideration is required.

97. Paragraph 2.11.8: it is problematic to assume that installing cables underground or subsea will fix all problems. It is essential that a holistic approach is taken to environmental evaluation and assessment to determine what impacts may occur, avoid impacts in the first instance and mitigate impacts that cannot be avoided.

98. Paragraph 2.11.10 mentions an 'in brief' version of the Holford rules. We note that the Holford Rules were produced as guidelines on overhead line routeing first formulated in 1959. Whilst they provide a useful baseline, there has been considerable change in technology and the approach to the environment since then. In relation to the historic environment, better understanding and clarity as to what is important to conserve, and approaches when impacts to historic environment are being contemplated. As such, some of the language of the Holford Rules do not reflect current policy and practice when addressing the historic environment. It would be preferable to be clear and consistent with the NPPF on the approach taken, informed by discussion with the sector.

99. With regard to the Horlock Rules, as referenced in paragraph 2.11.12, we note that they provide guidelines on siting and design of new substations, or substation extensions,

and again pre-date the NPPF. It would be preferable to be clear and consistent with the NPPF on the approach taken, informed by discussion with the sector. Paragraph 2.11.12 repeats the Horlock Rules use of the word 'culture' and uses the phrase 'landscape features' (referring to those elements of landscape of historic interest) but fails to capture the Horlock rules specific mentions of heritage or archaeological features - the heritage aspect of the Horlock Rules therefore needs to be addressed in 2.11.12.

100. With regard to paragraph 2.11.13 on Undergrounding, we emphasise that undergrounding as a part of the development is likely to be one of the most harmful elements on an application for the historic environment, particularly on non-designated assets, archaeological sites and historic landscape features. There is the potential for undergrounding of electricity lines to deliver significant positive effects on landscape receptors and heritage receptors, but also significant negative effects on historic environment receptors such as archaeological sites through construction impacts. This point is made in a slightly different way in the AoS of EN-5, but it should also inform the text here. Paragraph 2.11.13 refers to National Parks, AONBs and the Broads; reference should also be made to World Heritage Sites and areas of archaeological interest.

101. There is a need to update terminology in paragraph 2.11.14 to align with modern use and the NPPF. We recommend that “*historic importance*” be replaced with “*historic significance*” and “*archaeological and heritage sites*” replaced with “*designated and non-designated heritage assets*”.

102. Paragraph 2.11.16: screen planting is not universally acceptable and can in its own right be harmful to landscape or heritage receptors, e.g. of the wrong type or in the wrong place - full consideration and assessment needs to be undertaken.

103. Paragraph 2.12: noise and vibrations: these can also have contra/negative effects on the setting of heritage assets; impacts on the historic environment need to be considered from noise and vibrations.

**QUESTION 20. Do you agree with the new guidance added to EN-5 incentivising more coordination in the design and delivery of electricity transmission infrastructure associated with offshore wind?**

104. Historic England broadly welcomes greater co-ordination the design and delivery of electricity transmission infrastructure associated with offshore wind provided that the historic environment is given due weight and consideration in decision making.

**QUESTION 21. Do you agree with the amendments made to EN-5 to reflect priorities to minimise the landscape and visual impacts of new electricity network infrastructure including recognition of the ‘Horlock Rules’ and undergrounding in National Parks and Areas of Outstanding Natural Beauty?**

105. The above may offer a reasonable starting point for such considerations, but it needs to be substantially developed and enhanced, in discussion with the sector, and in accordance with the direction of recent years in policy making and guidance. Relying on the Electricity Act, and selectively using the wording of the Horlock rules and Holford rules does not reflect modern language or indeed other national policy (such as the NPPF). Further thought is needed to clarify the relationship of the Horlock rules with the NPPF, and the need for further changes, informed by engagement with statutory consultees and other stakeholders.

106. The historic environment is not acknowledged in this section of the NPS and undergrounding as a part of the development is likely to be one of the most harmful elements on an application for the historic environment, particularly non-designated assets, archaeological sites and historic landscape features.

107. The 'landscape and visual' section does not mention the historic environment, historic landscapes, designated or non-designated assets or historic receptors. Nor does it reflect their role in landscape development or the need to assess these as part of LVIA - now standard practice in DCO applications.

108. Also, the NPS text refers to compensatory mitigation (such as planting) and this also would need to ensure or take into consideration additional or contra impacts e.g. harmful effects on the setting of heritage assets and physical impacts on heritage assets.

**QUESTION 23a. Do you have any comments on the AoS findings for the draft Overarching NPS for Energy (EN-1)?**

109. There is repeated reference in the AoS to the 'built and natural environment', and 'the Built Environment' and 'the Natural Environment' are two of the six sustainable development themes included in the AoS for assessing alternatives. We view as unhelpful the approach used in the AoS to compartmentalise heritage as only a subset of the Built Environment, and for Landscapes and Townscapes to be considered only with reference to the Natural Environment. This is unfortunate and results in assessment that is insufficiently comprehensive.

110. Paragraph 1.7.4 of EN1, which summarises point from the AoS of EN-1, omits the historic environment. Lack of specific reference to culture and the historic environment suggests that the conclusions from the AoS of EN-1 are insufficiently clear.

111. Paragraph 5.6.3 in the AoS for EN-1 concludes that there is the potential for "*minor negative effects (including cumulative effects) on heritage assets in the short, medium and long term as a result of the potential impacts on heritage assets and their settings*". It goes on to acknowledge that a lot is site specific. There is scope for significant negative effects in some locations and minor effects in others, and this should be acknowledged in the headline conclusions made, both in the AoS and in EN-1.

112. The proposed indicator for monitoring the historic environment “no of assets impacted by new energy schemes” is not meaningful as a measure to indicate how heritage assets have been lost, protected or conserved. Historic England suggests an indicator that measures change to heritage assets compared to a baseline assessment. An indicator that measures the number of heritage assets that are placed on or removed from the [Heritage at Risk](#) register as a result of development is also recommended.

113. Note that the information source should be Historic England, not English Heritage.

114. The key findings from the AoS for EN-1 on page 8 focus on the inevitability of harm to heritage and the limited ability for landscape/townscape/seascape mitigation. While a balanced approach to decision making is always required, this lowers the bar for assessing heritage. The AoS, again on page 8, does go on to state that the significance of such effects and potential mitigation possibilities is largely uncertain at the strategic and non-site-specific stages of EN1-5 which is a helpful caveat. However, an overarching vision which sees harm as inevitable and sees mitigation as being limited does, to an extent, prejudice the ability of important heritage considerations to be dealt with at a more detailed, locational stage. The wording of EN1 and AoS could be changed to shift the tone of the text to talk about a balanced approach rather than one that implies built in harm from the outset. This aligns with the concept of sustainable development being that which also seeks to conserve the historic environment.

115. Reference is made on pages 43 and 44 of the AoS, and indeed elsewhere in the AoS, to Historic Battlefields and Parks and Gardens. To avoid confusion and align with the NPPF, Historic England suggests these entries are amended to ‘Registered Battlefields’ and ‘Registered Parks and Gardens’.

116. On page 94 of the AoS, reference is made to negative cumulative effects on the setting of heritage assets. As stated in the [Historic England Advice Note on commercial renewable energy development](#): *“Cumulative heritage impacts are frequently linked with setting, but they can also apply to physical impacts that ultimately may result in a change to the significance of a heritage asset; for example, a development may have hydrological impacts that cause changes to the groundwater level which in turn affects the preservation of waterlogged archaeological remains.”*

**QUESTION 23b. Do you have any comments on the AoS findings for the draft NPS for Natural Gas Generating Infrastructure (EN-2)?**

117. Assessment in the AoS focuses its consideration on effects on carbon emissions; air pollution; water quality and resources; and biodiversity. AoS objective 5 (*Protect and enhance cultural heritage assets and their setting, and the wider historic environment*) should be referenced in subsequent assessment, as should consideration of impacts on the historic environment.

**QUESTION 23c. Do you have any comments on the AoS findings for the draft NPS for Renewable Energy Infrastructure (EN-3)?**

118. Assessment in the AoS focuses its consideration on effects on carbon emissions; biodiversity; landscape and seascape; air quality; health and wellbeing; economy; and resources. AoS objective 5 (*Protect and enhance cultural heritage assets and their setting, and the wider historic environment*) should be referenced in subsequent assessment, as should consideration of impacts on the historic environment.

**QUESTION 23d. Do you have any comments on the AoS findings for the draft NPS for Gas Supply Infrastructure and Gas and Oil Pipelines (EN-4)?**

119. Assessment in the AoS focuses on carbon emissions (methane); biodiversity; landscape and visual; water quality and resources; air quality; soil resources and contamination; and noise and vibration. AoS objective 5 (*Protect and enhance cultural heritage assets and their setting, and the wider historic environment*) should be referenced in subsequent assessment, as should consideration of impacts on the historic environment.

**QUESTION 23e. Do you have any comments on the AoS findings for the draft NPS for Electricity Networks Infrastructure (EN-5)?**

120. Assessment in the AoS focuses on reducing carbon to net zero (with regard SF6); biodiversity and geological conservation; landscape and visual; noise and vibration; and health and well being and safety of all citizens (including electro-magnetic fields). AoS objective 5 (*Protect and enhance cultural heritage assets and their setting, and the wider historic environment*) should be referenced in subsequent assessment, as should consideration of impacts on the historic environment.

**QUESTION 24a. Do you have any comments on the HRA findings for the draft Overarching NPS for Energy (EN-1)?**

121. Historic England does not have specialist expertise in Habitat Regulations Assessment (HRA) nor in European Nature Conservation designations. However, we consider that the NPSs should be subject to the full HRA process, but do not wish to comment any further.