

Written evidence submitted by Historic England for the Business, Energy and Industrial Strategy Committee Inquiry into Energy National Policy Statements

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.

How we manage our heritage has a major impact on our carbon emissions, the ability of our heritage to withstand the threats from climate change, and the positive contribution heritage can make to help people adapt to a changing climate.

The very act of conserving our heritage is entirely consistent with environmental sustainability principles: retaining embodied carbon, increasing carbon sequestration and reducing waste. We welcome the opportunity to submit a response to the Business, Energy and Industrial Strategy (BEIS) Committee for the *Inquiry into Energy National Policy Statements*.

General Comments

Historic England's review of the revised energy National Policy Statements (NPSs) has raised the following key points:

1. Full consideration of the historic environment is needed across the energy NPSs rather than being mainly addressed within EN-1. The current approach to the historic environment is in sharp contrast to the natural environment, which is considered in detail across all the energy NPSs.
2. The terminology within the NPSs on the historic environment should be aligned with current national policy and guidance found in the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG).
3. 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.
4. There is the opportunity in EN-1 to set out a more ambitious and innovative strategic overview to help deliver the path to net zero.
5. There is the need for greater clarity on the role of statutory consultees across the energy NPSs.

Responses to Questions Posed by the Call for Evidence

How effectively the revised NPS supports the Government's targets for net zero by 2050

Climate change poses an existential threat to heritage assets. The best way to address this threat is to limit global warming: as an organisation tasked with

protecting our heritage, Historic England supports action that addresses the causes of climate change.

The relative importance of different energy technologies is shifting, with a greater reliance on electricity from renewable sources (as set out in the Energy White Paper and reflected in the energy NPSs). Historic England welcomes greater engagement in the agenda on how the historic environment can lead and support a positive approach to reducing the impact of climate change on the pathway to net zero.

Within the consultation draft of EN-1 there is a missed opportunity to consider the scale and nature of change over the next decades and reflect this within a more ambitious strategic overview. Historic England recognises that the revised EN-1 does allow for greater flexibility, however it still looks back to the EN-1 July 2011 publication without enough consideration of changes over the last decade and future transformation in the coming decade. Therefore, a forward-facing and ambitious strategic overview to deliver the path to net zero would be supported.

How effectively the proposals in the revised energy NPS supports the communities who will be impacted by the delivery of new energy infrastructure

There is potential for communities to be impacted (positively and negatively) from both delivery of new infrastructure and decommissioning of energy infrastructure; and that impact on the historic environment is a key consideration in understanding the impact on communities.

Historic England research shows communities value and benefit from the historic environment in the following ways:

- Heritage has an important role in connecting communities.¹
- The historic environment has a positive and significant impact on people's sense of place.²
- The historic environment makes a positive contribution to community life by boosting social capital, increasing mutual understanding and cohesion, and encouraging a stronger place.³

Therefore, proposals which have the potential to impact the historic environment, also have the potential to impact on communities and their valued places. Historic England champions and protects the historic environment because we recognise its power to help improve people's lives

Adverse impacts and potential benefits for communities and heritage in relation to decommissioning of energy infrastructure are less apparent within the revised energy NPSs. Decommissioning is an important consideration for all energy infrastructure when it becomes obsolete. There could be further detail and a more

¹ <https://historicengland.org.uk/research/heritage-counts/heritage-and-society/>

² <https://historicengland.org.uk/research/heritage-counts/2009-sense-of-place/>

³ <https://historicengland.org.uk/content/heritage-counts/pub/2014/value-impact-chapter-pdf/>

established policy position on this within the NPSs, seeking to redress temporary or long-term impacts on the natural, built and historic environment. As part of decommissioning, the Energy White Paper emphasises the shift from oil and coal energy generation. This is covered in EN-2, however there is limited provision to conserve industrial heritage and restore historic natural landscapes as part of the long-term legacy for communities. Provisions in the Environment Act 2021 can also be taken into account: for instance, there is potential to factor in landscape restoration through land management arrangements as part of requirements within energy decommissioning programmes.

How effectively the revised energy NPS takes account of sustainability and environmental considerations

The revised energy NPSs would benefit from greater alignment with Government planning policy and guidance on environmental matters in order to better integrate the historic environment within energy infrastructure policy. It is essential to ensure consistency between the NPSs and the NPPF and PPG: taking account of sustainability principles which are central to the planning regime, and embedding protection of the natural, built and historic environment within plans for energy infrastructure delivery. It is also important to ensure consistency in terminology relating to the historic environment, taking account of the definition in the NPPF glossary.

The narrow focus on the natural environment within the revised energy NPSs, risks unintended consequences for the historic environment. For example, the narrow definition within the Appraisal of Sustainability (AoS) of the historic environment being part of the built environment means the potential impact of energy infrastructure policy revisions may not be fully understood and risks harm to the historic environment.

By extending the definition to the natural, built and historic environment (as per NPPF paragraph 8) the historic environment would, correctly, remain central to environmental matters rather than risk only being addressed later in the DCO process. This would also provide assurances that the historic environment has been adequately considered within the AoS of energy NPS revisions.

Historic environment matters should be dealt with consistently across the energy NPSs, as is the case for the natural environment, rather than receiving limited consideration in the generic impacts section of EN-1. This will allow impacts on the historic environment to form part of the feasibility, analysis, and assessment stages of energy infrastructure projects; with specific impacts considered and appropriate weight given to impacts on the historic environment within each energy NPS, rather than remaining solely a strategic consideration in the overarching EN-1.

The 'Landscape and Visual Impacts' and 'Landscape and Townscape' sections of the energy NPSs, should also include analysis of the historic environment, including the setting of heritage assets. Many of England's iconic landscapes have a historic significance and setting contributes to this significance. Indeed, protected landscapes such as National Parks and Areas of Outstanding Natural Beauty are designated in part due to their heritage values and in certain cases may overlap with other heritage designations such as World Heritage Sites.

In its function as an overarching energy NPS, EN-1 could provide stronger oversight on strategic matters such as managing and responding to the cumulative impact of multiple Nationally Significant Infrastructure Projects (NSIPs) on the natural, built and historic environment. This would allow for a more sustainable approach to NSIP planning and delivery. Appropriate avoidance and mitigation measures could be put in place which account for the overall impact of multiple NSIP schemes. An approach to managing cumulative NSIPs also ensures appropriate safeguards are put in place so that decisions on NSIP schemes are not taken in isolation.

A key focus of the Energy White Paper is the drive towards increased electricity generation from renewable sources, primarily from offshore windfarms. Historic England recognises the changing impact on the historic environment from this strategy.

For example, the current arrangements for onshore electricity sub-stations as single connection points to link offshore windfarms to the national grid network have the potential to impact on the historic environment and wider community in terms of the risk of harm to the significance of heritage assets including their setting. New proposals set out in EN-3, for marine based Multi-Purpose Interconnectors (MPIs) to link offshore windfarms to the national grid network have the potential to reduce the onshore impact to heritage and communities. However, considerations regarding marine heritage and the appropriate assessment of impacts on the historic marine environment remain.

Historic England welcomes a more strategic approach in response to the scale of electricity generation from offshore windfarms which should enable better consideration of community and environmental impacts at an earlier stage in the DCO process. Our advice in [Commercial Renewable Energy Development and the Historic Environment](#) has further details about offshore windfarms and the historic environment.

We hope this response is helpful to the Inquiry.

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