

EVIDENCE SUBMISSION BY HISTORIC ENGLAND

I. The role of Historic England

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.

II. Historic England and maritime development

Historic England's involvement with marine development matters were extended (under the National Heritage Act 2002) to modify our functions to include securing the preservation of monuments in, on, or under the seabed within the seaward limits of the UK Territorial Sea adjacent to England (12 nautical miles). We also provide our advice in recognition of the English marine plan areas (inshore and offshore) as defined by the Marine and Coastal Access Act 2009 and as described within the UK Marine Policy Statement and the policies of published or draft Marine Plans.

III. Offshore Wind and the Historic Environment

Historic England welcomes the opportunity to submit evidence to this inquiry - we understand the potential harmful impacts of climate change for society more generally, but also on the historic environment itself. As a consequence, we support a balanced approach to this issue, in which the potential harm and benefits for heritage are considered alongside more general sustainable development goals. We also appreciate that the focus is on the Government's *Offshore Wind Sector Deal* (published March 2019). We are aware that this sector deal focusses on the support given by the Government to identifying technological advances in offshore wind, the environmental and social impacts of installations and how opportunities might be realised to deliver greater capacity. We note that it is not the intention of this inquiry to direct specific attention at matters associated with onshore cable routes or locations of new electricity substations. However, impacts on land linked with offshore wind development also represent an important consideration when supporting sustainable development; if useful, Historic England can supply further relevant evidence on request.

From the questions identified by the Committee we have focused this submission on the following question given its relevance to our role and responsibilities.

- VI. *How well is the UK industry managing the environmental and social impacts of offshore wind installations, particularly on coastal communities with transmission-cable landing sites?*

Summary of our evidence:

1. In general we are satisfied by the completion of statutory environmental assessment requirements by the offshore wind industry.
2. We hope that the Inquiry will recognise how these projects produce highly important data about prehistoric environmental change; this work supports the

evidence base for promoting renewable energy projects as a means to address future projections of climate change and risks to society.

3. We are aware that many more offshore wind farms are likely to be built and which will operate long into the future, so we hope that this inquiry will give prominence to an initiative that looks across all developments in this sector for cumulative data sharing, minimises harm and optimises knowledge gain.

1. The Offshore Wind Industry and cultural heritage

- 1.1 The offshore wind industry is obliged to comply with statutory environmental assessment procedures which encompass consideration of possible impact to the historic environment. The scale of these developments, and the fact that they span marine and terrestrial environments, has necessitated a coordinated approach to environmental assessment. In doing so, developers need to ensure the necessary professional skills and competencies are applied to identifying sensitive sites, whether at sea or on land, and in particular the risks associated with the development encountering previously unknown archaeological material. In general, we are satisfied by the completion of Environmental Impact Assessment (EIA) exercises as necessary to support applications made for statutory consent as Nationally Significant Infrastructure.
- 1.2 It is important to add that the likelihood of encountering heritage assets (as defined by the National Planning Policy Framework and UK Marine Policy Statement) is particularly acute for the seabed development areas. Modern surveying techniques allow the comprehensive examination of offshore areas and in doing so may reveal or confirm the presence of previously unknown shipwreck, crashed aircraft and also evidence of prehistoric environmental conditions now submerged and buried within today's seabed. It is therefore an important matter that the offshore wind industry is fully informed by national policy to ensure the effective management of heritage assets that are discovered in English Marine Plan areas.

2. Action taken by the industry to engage with Historic England

- 2.1 The situation to date for engagement between offshore wind farm developers and Historic England has grown in confidence. Early engagement is important so that advice is optimised and used to inform the planning of these developments. In particular it is important that survey campaigns are commissioned with objectives that satisfy as many audiences as possible. For example, survey planning which seeks to examine engineering parameters will also generate data which can be explored by professional and experienced archaeological consultants. It is through effective data sharing that highly relevant information can be generated to satisfy overarching environmental assessment criteria, including risks to cultural heritage.
- 2.2 Post-consent, it is an important matter that the deployment of construction vessels and equipment necessary to build an offshore wind farm i.e. the configuration of turbines, cables and offshore substations, should avoid identifiable seabed anomalies. Such anomalies could compromise engineering integrity or even other health and safety factors (e.g. unexploded ordnance), so it is in the interest of all parties that the nature of anomalies encountered are

subject to investigation to determine if an anomaly or cluster of anomalies are indicative of an archaeological site (e.g. the scattered remains of a shipwreck). The management of these projects by the industry should therefore always be to promote and deliver a collaborative approach whereby avoidance of impact is a primary objective. Experience to date has shown that such measures (e.g. the use of exclusion zones) are used by the industry in recognition of the direction provided by National Policy Statements (NPSs) e.g. NPS – EN3 (Renewable Energy Infrastructure) paragraph 2.6.145.

3. Examples of interaction with the offshore wind industry and what it produces for the public good

- 3.1 When offshore wind farm developers make discoveries we have supported action to help reveal new information about our shared past. To date, we have worked with developers to provide public information such as the discovery of U-31, a First World War German submarine, which was found within an offshore area leased for development (<https://www.bbc.co.uk/news/uk-england-norfolk-35370700>) and the recovery of a ship's bell from a vessel built in Sunderland in 1928 which is now part of the permanent collection of the Maritime Heritage Visitor Centre in Sunderland (<https://renews.biz/48562/galopper-rings-true-in-sunderland/>). An important aspect of offshore wind farm developments is the targeted examination of sub-seabed sedimentary conditions. Such information is directly necessary for the technical design of the development, but can also generate highly important data to inform our understanding about prehistoric environmental change. For example, sediment cores obtained by an offshore wind farm developer from the North Sea also demonstrated the presence of a now submerged 8,000 year old landscape.
- 3.2 We consider it an important part of this submission that in recognition of the policy objective to deliver more renewable, low-carbon sources of electricity production that offshore wind development can also help to reveal long term evidence of climate change, as demonstrated by evidence of rising sea levels that flooded prehistoric landscapes in locations such as the North Sea. Such discoveries support research and publication e.g. within the *Journal of Quaternary Science* (<https://onlinelibrary.wiley.com/doi/abs/10.1002/jqs.3039>). Recognition of a collaborative link was identified within the *UK Marine Science Strategy 2010-2025* between archaeological studies of our prehistoric past and our understanding about climate change and we hope that this inquiry will recognise the importance of such research. We add that the Government's obligation to compete Strategic Environmental Assessment exercises to support policy decision for offshore energy production, and the detail within National Policy Statements, should also reinforce how developer-led investigations can increase our knowledge and understanding as a beneficial outcome for society.

4. The overall effectiveness of the current approach

- 4.1 It is apparent that several offshore wind farm projects off the East Anglian coastline require cable landfall locations adjacent to locations where highly important archaeological materials have been excavated by among others, the British Museum. The effective management of impact at such locations is crucial with the avoidance strategy to the fore, so that cable installation techniques are adopted to reduce risk of disturbance to archaeologically

important sedimentary sequences. We have also provided advice in reference to coastal heritage assets and other locations designated as World Heritage Sites, specifically in terms of harm to Outstanding Universal Value.

- 4.2 In reference to World Heritage Sites we are aware that UNESCO is currently undertaking a study on renewable energy and World Heritage (<https://whc.unesco.org/en/renewable-energy/>), which is due to report in the spring of 2021. The aim of this project is to develop guidance to help prevent conservation issues at World Heritage properties from the adaptations necessary to cope with climate change, and indeed to look for ways in which renewable energy and World Heritage protection can be complementary. We appreciate that World Heritage Sites are very diverse and can be impacted in very different ways, but by placing an emphasis on understanding the Outstanding Universal Value of these sites is key to understanding impact. UNESCO has also produced a wide range of documents and guidance on climate change to develop understanding of its impact on World Heritage (<https://whc.unesco.org/en/climatechange/>).
- 4.3 When the impact to a heritage asset, including its setting, might be harmed by a proposed offshore wind farm it is important that the decision-maker determines how any harm might be justified, and in general this requires consideration of avoiding harm first, mitigation that minimises the harm and then balancing any harm in the way laid out in National Policy Statement EN-1 (paragraph 5.8.15) and the National Planning Policy Framework. We recognise that there is a balance to be undertaken with regards harm to the heritage asset arising from the proposal against the benefits, but that great weight should be given towards the conservation of the heritage asset. Such a position is recognised within National Policy Statement EN-1 whereby the ability to record evidence of an asset should not be a factor in deciding whether consent should be given (paragraph 5.8.19). Furthermore, in reference to the importance of setting we explain within our advice note entitled *The Setting of Heritage Assets* how setting contributes to the significance of archaeological remains, historic buildings, places and landscapes (<https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>).
- 4.4 It is also important that we draw your attention to possible impacts to onshore i.e. coastal heritage assets and how setting might contribute to the significance of the asset. For example, a heritage asset with a direct and specific maritime association or design, such as a Registered Park and Garden with designed cliff top viewpoints, will be at risk of greater impact to its significance from an adjacent marine development. In this regard we are very mindful of changes in the scale of offshore turbines and the considerable increase in size of units and massing within an array; particularly where extensions are planned to existing developments. It is therefore a matter relevant to this Inquiry that adequate consideration occurs in the application of National Policy Statements and the regard given to the National Planning Policy Framework as part of the decision-making process.
- 4.5 We therefore take this opportunity to refer you to our draft Historic England Advice Note: *Commercial Renewable Energy and the Historic Environment* (<https://historicengland.org.uk/about/what-we-do/consultations/guidance-open-for-consultation/>) and the emphasis we place on striking a balance between harm and benefits which we look to resolve on a case-by-case basis; this allows us to produce advice that considers in detail the proposal in reference to

relevant policy and guidance and as relevant to our statutory remit. For English marine planning areas, as defined by the Marine and Coastal Access Act 2009, this requires Historic England to produce advice where very few heritage assets are afforded statutory status. The measures contained within the UK Marine Policy Statement and within published or draft Marine Plans and NPSs EN-1 (Overarching NPS for Energy) paragraph 5.8.5 are highly relevant. Specifically, the recognition that non-designated heritage assets affected by a proposed development should be treated in accordance with the same policy considerations as for designated heritage assets.

- 4.6 The concept and perception of seascape and in particular the approach championed by Historic England through our Historic Seascapes Characterisation programme does receive attention from the offshore wind industry. The completion of environmental assessment exercises includes consideration of the capacity of historic character to accommodate change, which provides essential context for appreciation of heritage assets. We therefore value the attention given to perceptions of 'seascape' as detailed within the UK Marine Policy Statement and National Policy Statement EN-3 (e.g. paragraph 2.6.200). Such an approach allows for essential public scrutiny and the determination of any impact and harm which should inform how this industry engages with local communities. In this regard, Historic England acknowledges the crucial role played by local planning authorities in managing the historic environment; and we will continue to participate in a way that supports our partners, and allows us to lead the sector as champions of our nationally important heritage.

5. Matters that require attention – cumulative effects

- 5.1 The promotion given to offshore wind energy as a key component of diversifying our power generation capacity, as demonstrated by The Crown Estates announcement of the Round 4 seabed leasing programme, means that particular environmental assessment matters require even more attention; such as how the offshore wind industry conducts environmental assessment exercises to address complex matters associated with cumulative impact.
- 5.2 NPS EN-1 requires consideration of mitigation for cumulative negative effects on individual development consent applications (Paragraph 1.7.3). However, consideration of such cumulative impacts, as could arise from an individual proposal, needs to be reconciled with assessment across multiple applications/consented schemes which could give rise to an accumulation of impact on heritage assets. We have noticed that in areas where there have been several applications there is also an opportunity for knowledge gained from one application to benefit our collective understanding. We therefore hope that this Inquiry and its engagement with the offshore wind industry sector will lead to recognition that cumulatively individual projects could have negative effects in particular locations. There could also be a positive outcome in terms of knowledge gain, but one that requires coordinated action between separate projects. Historic England has worked with government, industry and The Crown Estate previously to examine matters such as this, but in consideration of possible future developments in locations such as Dogger Bank and within the southern North Sea, which hold highly significant evidence of prehistoric environmental conditions and which continue to attract research (<https://www.springer.com/gp/book/9783030373665>), we hope that this Inquiry

will further promote collaborative working between developers, The Crown Estate and research professionals.

- 5.3 The *Offshore Wind Sector Deal* highlights how wind farm development projects have provided opportunities for revitalisation of historic harbour facilities in the UK. We therefore hope that similar opportunities will be realised elsewhere for the benefit of local communities and associated social benefits. In this regard we highlight that a collaborative approach that seeks to support civic regeneration programmes could link with an initiative such as Historic England's Heritage Action Zones (<https://historicengland.org.uk/services-skills/heritage-action-zones/>). We add that the Heritage Action Zone initiative has focused on locations such as Grimsby, Hull, Lowestoft and Ramsgate which today all have connections with the offshore renewables sector. These locations are now recognisable 21st century hot spots for the involvement of these maritime enterprises and we see further opportunities to support social engagement and empowerment through conserving and celebrating their character and heritage. We hope that this is a matter highlighted by this Inquiry.

Evidence submitted by Historic England

Date: 15th May 2020