

Ports and shipping division, maritime directorate
Department for Transport
Great Minster House
33 Horseferry Road
London, SW1P 4DR

18th July 2025

Dear Sir/Madam,

Proposed amendments to the existing national policy statement for ports

Thank you for the invitation of comment on the revised draft National Policy Statement for Ports, dated 4th June 2025.

The Historic Buildings and Monuments Commission for England (Historic England) is a statutory consultee in relation to the historic environment, the lead body for the heritage sector and the Government's principal adviser on the historic environment.

Historic England is a Non-Departmental Public Body sponsored by and reporting to the Secretary of State for Culture, Media and Sport. In addition to our responsibilities within the terrestrial landscape, the National Heritage Act 2002 enabled Historic England to assume responsibility for maritime archaeology in the English inshore marine planning area.

In consideration of our specific role and responsibilities we have provided this written response.

We are aware that the proposed amendments to the National Policy Statement for Ports (published January 2012) allow for new factors and policy considerations to be included such as the Government's ambitious targets for the expansion of offshore wind generation and how port infrastructure to support construction, operation and maintenance and decommissioning of offshore wind turbines, as mentioned in paragraphs 2.1.8 and 2.1.10, should be able to realise new commercial opportunities.

In paragraph 2.2.2, regarding government policy for sustainable development that port infrastructure projects should (in bullet point 8) provide high standards of protection for both the natural and historic environment, as well as ensuring access to and condition of heritage assets are maintained and improved where necessary (as captured in bullet point 9).

Section 3.5 (General approach to environmental impacts and Environmental Impact Assessment) – we appreciate the attention given to the importance of a holistic approach to avoiding, mitigating or compensating multiple impacts (paragraph 3.5.6), but add that this should be considered inclusive of cultural heritage together with the natural or built environment, landscapes and seascape.

Section 4.3 (Dredging) in paragraph 4.3.4 mentions that there is no requirement for a qualified archaeologist to be on board a dredger engaged in capital dredging and we agree that such action may be appropriate as guided by historical or hydrographic evidence, which may relate to either known heritage assets or the risk that presently unknown heritage assets might be encountered. Paragraph 4.14.21 effectively captures this important matter and the use of consenting mechanisms to secure appropriate procedures (such as an archaeological written scheme of investigation and reporting protocol for discoveries) to inform survey, identification, analysis and treatment of heritage assets discovered before and during construction.

We have worked with the ports' sector for many years on major development projects (e.g. the reconfiguration of access to Portsmouth Harbour for the Royal Navy's Queen Elizabeth class aircraft carriers and the construction and capital dredging for London Gateway Port as now used by Ultra Large Container Vessels, so that the necessary attention is given to determining and offsetting impacts on the historic environment, as mentioned in paragraph 4.6.2. The development of knowledge and good practice working with ports led us to publishing in 2016 *The Assessment and Management of Marine Archaeology in Port and Harbour Development* (<https://historicengland.org.uk/images-books/publications/assessment-management-marine-archaeology-port-and-harbour-development/>).

We support the retention of the detail contained within section 4.14 (Historic environment) and the matters relevant to the decision-maker, such as set out in paragraphs 4.14.13 – 4.14.17. Furthermore, we welcome the continued attention in paragraphs 4.14.19 and 4.14.20 (Recording) and the importance of stipulating requirements on developers to secure the completion of archaeological assessments and associated reporting. We particularly welcome the attention given to the role of local museum services, which we can illustrate in reference to the wreck of the *London* (sunk in 1665) which was rediscovered during the assessment work for the London Gateway Port capital dredging programme, and which is now designated under the Protection of Wrecks Act 1973. Artefacts recovered from this nationally important historic shipwreck are displayed at Southend Museums Services and continue to provide considerable public interest.

Yours faithfully,



Dr Christopher Pater
Head of Marine Planning