

Draft National Policy Statement: fusion energy generation (EN-8)

14/08/2026

Consultation available here: <https://www.gov.uk/government/consultations/draft-national-policy-statement-for-fusion-energy-generation-en-8>

Draft NPS EN-8:

<https://assets.publishing.service.gov.uk/media/6a22d0fae13080622db38716/draft-nps-for-fusion-en8-print-ready.pdf>

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Historic England 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 comment on this draft NPS.

Historic England has published specific guidance on Sustainability Appraisals (SA) and Strategic Environmental Assessments (SEA), which contains further details on baseline information, sustainability issues and objectives, indicators and monitoring. This document may be helpful for SEA and can be found here:

Historic England Advice Note 8: Sustainability Appraisal and Strategic Environmental Assessment: <https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/>

Historic England recognises the transformational potential of UK fusion energy infrastructure. Fusion places world leading UK science at the heart of the growth agenda, contributing to energy security and net zero objectives. We welcome that the NPS notes early engagement with Historic England may help avoid delays. We are proactively engaged with the STEP scheme at West Burton and with our heritage sector partners, to ensure this is the case. On 27 November 2025 Historic England signed a Memorandum of Understanding with UK Industrial Fusion Solutions Ltd to provide a framework for ongoing joint working and collaboration. This is indicative of Historic England's positive engagement with fusion technology and government's vision for streamlined infrastructure delivery. We hope to build these same positive relationships across the emerging fusion sector.

Detailed comments

Part A: Scope and clarity

1. Does draft EN-8, when read alongside EN-1 (and other relevant National Policy Statements), provide a clear, coherent and appropriate planning framework for fusion energy infrastructure?

Partially

Overall, draft EN-8 appears to provide a broadly clear and coherent framework for decision-making on fusion energy infrastructure when read alongside EN-1 and, where relevant, EN-5. However, there are areas where the framework could be strengthened to provide greater certainty regarding heritage outcomes and decision-making, particularly in relation to the contribution that setting can make to significance. EN-8 contains relatively little heritage-specific policy and instead relies on the "Historic Environment" provisions within EN-1. While this avoids duplication, applicants and decision-makers would benefit from more explicit guidance about the particular heritage challenges associated with fusion energy developments, particularly given their scale and long operational life as noted at EN-8 Draft 3.2.14. We welcome attention to this point and would also highlight the likely scale of off-site works associated with the construction of large and complex facilities, particularly their transport needs for workforce, bulk materials and large indivisible loads, which may require significant new facilities and improvements.

The NPS recognises that fusion facilities are expected to comprise large buildings causing visual intrusion and potentially long-term effects on heritage significance, and that impacts may not be capable of complete mitigation. To this end we advise that the NPS should place greater emphasis on avoiding harm through site selection and design before mitigation is considered, and so developments can be de-risked as early on in the process as possible. Applicants should demonstrate how heritage considerations influenced site selection, design and consideration of reasonable alternatives. This will then assist decision makers and also stakeholders in considering the proposals and aim to remove/limit risks early in the process.

Developments should adhere to the approach advocated in EN-1: that of avoid harm and then minimise/mitigate. This will then assist decision makers and stakeholders in considering the proposals and aim to remove/limit risks early in the process. We are aware that particularly in an emerging technology there needs to be scope for design to evolve through the development process and beyond. Chosen sites and design parameters should sustainably accommodate this scope for adaptation, extension and evolution of facilities rather than relying upon narrow constraint to the development envelope to achieve an acceptable outcome.

We welcome reference at para 2.2 of the Draft EN-8 to the importance of good design in landscape context given as noted at 3.2.14 the large and long-term character of likely installations. These are new architectural forms, likely to be at significant scale and massing,

there is potential for a degree of architectural confidence and identity to be developed across this technology (rather than an effort to simply camouflage), as was seen in the 1960's CEGB coal-fired stations and/or for individual site specific architectural responses as in Trawsfynydd nuclear power station by Sir Basil Spence, the policy should acknowledge these may not be recessive structures easily absorbed into the landscape and that as such they need a degree of architectural vision to match their technological aspiration.

Many heritage impacts may arise not only from the fusion facility itself but also from associated infrastructure such as transmission connections, substations, cooling systems, transport infrastructure and water management works. While the NPS refers to EN-5 where relevant, we advise that the NPS contains stronger references to cumulative assessment across all project elements in addition to the potential scale of on / off site Biodiversity Net Gain obligations. Careful consideration is required on how these associated infrastructure elements can also be designed and issues engaged with, so as to ensure that legislative and policy requirements are met.

Part B: Role, scope and assessment principles

2. Do Sections 1 and 2 of draft EN-8 provide sufficient clarity on the role, scope, and assessment principles of the fusion energy National Policy Statement?

Partially

Sections 1 and 2 of draft EN-8 generally provide a clear explanation of the role, scope and assessment principles of the National Policy Statement for fusion energy generation. The document clearly establishes the relationship between EN-8 and the overarching energy NPS (EN-1), explains the circumstances in which EN-8 applies, and identifies the key assessment considerations relevant to fusion energy infrastructure. It also provides useful clarification regarding the interaction between the planning regime and the various regulatory regimes that apply to fusion energy facilities

While the draft appropriately relies on the generic historic environment policies in EN-1, there is relatively little fusion-specific discussion of heritage matters in Sections 1 and 2. While reliance on EN-1 has been the convention with other, more established technologies, this new technology would warrant more tailored guidance in relation to heritage given the potentially significant effects that large-scale fusion developments could have on archaeology, historic landscapes and the significance of heritage assets (including through development in their settings).

Part C: Assessment considerations

The following question seeks views on the fusion-specific assessment considerations set out in Section 3 of draft EN-8.

The need for nineteen considerations in draft EN-8, grouped into Environmental, Safety & Security, Operational and Developmental themes, was confirmed in [the Government's July 2025 consultation response](#).

This response also confirmed that EN-8 should not identify specific sites for fusion energy infrastructure and should be technology agnostic (apply to fusion infrastructure regardless of the specific fusion approach or device design proposed) and output agnostic (recognising that future fusion energy infrastructure may generate thermal energy as well as or instead of electrical), to maximise flexibility for developers and responsiveness to innovation in fusion design. Additionally, it confirmed that no local population density restrictions would apply to fusion energy infrastructure, reflecting its low radiological risk. Draft EN-8 has been developed accordingly.

Are the approaches set out for each consideration adequate and appropriate for all fusion energy infrastructure, making clear what, if anything, is required beyond the requirements of EN-1?

Partially

Section 3 provides a generally adequate and appropriate framework for assessing fusion energy infrastructure and successfully identifies where additional considerations are required beyond those contained in EN-1. However, the effectiveness of the framework could be enhanced through additional clarification relating to archaeology, historic landscapes, heritage setting, marine heritage and cumulative impacts from associated infrastructure. Such amendments would strengthen confidence that nationally significant fusion energy projects can be delivered while appropriately conserving the historic environment.

Working from the text in EN-3 (which has a similar structural relationship to EN-1) we suggest the following text for consideration. This is modelled on EN-3, with some modifications to align better with the potential character of EN-8 developments and relevant good practice:

Historic Environment

The impacts of fusion infrastructure on the historic environment will require expert assessment in most cases and may have effect both above and below ground.

Above ground impacts may include the effects on the setting of Listed Buildings and other designated heritage assets as well as on Historic Landscape Character.

Below ground impacts, may include direct impacts on archaeological deposits through ground disturbance on and off-site. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, the applicant should

submit an appropriate desk-based assessment with reference to multiple sources of new and existing data including the Historic Environment Record and, where necessary, a field evaluation. A phased and iterative approach to assessment should integrate multiple new and existing data sources to model likely archaeological potential at a landscape scale, targeting locations for further investigation considering risk of importance, sensitivity to change and project delivery considerations.

These should be carried out using expertise where necessary and in consultation with the LPA(s) and their archaeological advisers, should identify archaeological study areas and propose appropriate schemes of investigation, and design measures, to ensure the protection of relevant heritage assets. The results of pre-determination archaeological evaluation inform the design of the scheme and related archaeological planning conditions.

In some instances, field studies may include investigative work (and may include trial trenching beyond the boundary of the proposed site) to assess the impacts of any ground disturbance, or of works in rivers or the sea.

The extent of investigative work should be proportionate to the sensitivity of, and extent of, proposed ground disturbance in the associated study area. Applicants should take account of the results of historic environment assessments in their design proposal.

Applicants should consider what steps can be taken to ensure heritage assets are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting.

As the significance of a heritage asset derives not only from its physical presence but also from its setting, careful consideration should be given to the impact of fusion infrastructure which depending on their scale, design, and prominence, may cause substantial harm to the significance of the asset. Applicants may need to include visualisations to demonstrate the effects of a proposed infrastructure on the significance of heritage assets.

Part D: Environmental assessments

The following question seeks views on the conclusions of the Appraisal of Sustainability and Habitats Regulations Assessment undertaken for draft EN-8. Copies of these can be found [here](#). These assessments have been carried out at National Policy Statement level and do not assess specific sites or projects. Respondents are therefore invited to consider whether the assessments are reasonable and appropriate for a plan-level policy document, rather than commenting on the likely impacts of individual fusion energy projects.

4. Are the environmental assessments (Appraisal of Sustainability and Habitats Regulations Assessment) for draft EN-8 reasonable and appropriate?

Partially

From a Historic Environment perspective, the Appraisal of Sustainability provides a proportionate and generally robust assessment of historic environment issues for a non-site-specific National Policy Statement. It identifies the relevant categories of heritage asset, recognises archaeological and setting impacts, and appropriately references the role of Historic England, and need for project-level assessment. However, the assessment does underestimate the potential magnitude of effects from large-scale fusion infrastructure, particularly in relation to heritage settings, historic landscapes, seascapes and cumulative impacts. We advise that the NPS makes stronger recognition of these issues and greater acknowledgement that significant adverse effects could arise depending on siting and design.

Part E: Further comments

5. Do you have any other comments on draft EN-8?

No