

Public Consultation: Holistic Network Design Implementation Plan and SEA

1. Full Name

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2. Organisation

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3. Please provide your feedback on the Holistic Network Design Implementation Plan

Thank you for the opportunity to comment on the HNDIP and the accompanying environmental assessments. Historic England is the government's statutory adviser on all matters relating to the historic environment in England including the marine planning area. Our comments are therefore limited to the HNDIP and the SEA only (see also question 4).

The overall purpose of the HNDIP to set out high-level strategic design recommendations for offshore grid connections (export cables, landfalls, onshore substations / converter stations) to connect large-scale offshore wind to the national grid, is to be welcomed. We note that onshore infrastructure does not fall fully within the HNDIP's current scope for detailed routing and will be subject to further detailed design. Onshore features are intrinsically linked to appropriate siting, routing and development of networks and therefore should be considered at the earliest opportunity and we would be pleased to advise further on this when necessary.

Given the scale of offshore cables, landfalls, onshore substations/converters required, there is a significant potential for interaction with heritage assets including intertidal archaeology, buried archaeology in onshore corridors, as well as built heritage and setting. We understand that the strategic corridors (for cables, landfall points, onshore cable corridors and onshore interface substations/converters) and recommendations are indicative only, and that detailed project-level design and routing may deviate from those in the HNDIP. It is therefore important to ensure that consideration and assessment of the historic environment are fully incorporated. We are concerned that in its current format the HNDIP repeatedly focuses on natural environmental constraints and places less emphasis on heritage constraints.

For example, the HNDIP states that individual projects will undergo Environmental Impact Assessment (EIA) (Future Project Development and Consenting, pages 6-7) as necessary, and that each will consult the relevant nature / environment authorities. Page 38 (HND Implementation Plan Monitoring) also refers to consultation with statutory nature conservation bodies. Neither explicitly recognise heritage statutory consultees. We recommend greater emphasis on the requirement to consider the historic environment at all stages, i.e. at the strategic plan level and in references to project stages. Doing so would reinforce the need for early engagement, which is Historic England's preferred way of working. Ultimately this can result in speeding up development delivery and a reduction in costs.

It also enables early consideration and understanding of potential impacts on the historic environment and can identify where these can be avoided or minimised. The current emphasis on the natural environment fails to recognise or consider that the historic environment, as a finite resource, cannot be compensated for in ways the natural environment can.

Scoping heritage in at an early stage can also assist in the identification of opportunities for social benefits because of development. For example, investing in the development, preservation, and/or regeneration of existing heritage assets has the potential to offer multiple community wellbeing benefits, such as connection to place, strengthening feelings of identity and belonging and social connections. Heritage assets are not passive – they are unique symbols of local identity and vital centres of community activities and services, and they can offer a sustainable pathway to low-carbon solutions and community wellbeing through social prescribing, mental health support and placemaking. Without giving prominence to heritage in the HNDIP these opportunities could ultimately be missed.

It is important to ensure that a robust baseline of heritage constraints (onshore and offshore) is incorporated as the detailed routing and design proceeds. This includes the [Marine Data Exchange Heritage Accelerator \(MDEHA\) project](#) (more details are in our response to question 4).

The HNDIP is a network-scale strategy rather than a single project so the cumulative impact of multiple cable landfalls, corridors, substations and converters on the historic environment will need to be carefully considered. The plan rightly identified areas e.g. East of England as hotspots of cumulative impacts. For the offshore historic environment, cumulative impact could result in a loss of access to an area for archaeological study e.g. known prehistoric river systems under the North Sea which could be lost for up to 30-50 years due to placement of infrastructure, some of which may never be removed.

Onshore cumulative impacts are likely to have an impact on landscape, seascape and visual amenity including the impacts on the setting of designated and undesignated heritage assets.

4. Do you have any comments on the environmental assessments conducted as part of the plan (SEA, HRA and MCZ)?

Scoping of SEA Issues (Table 2) – we welcome that Cultural Heritage has been included in reference to how the historic environment is encountered either on land or in any sea area. We appreciate how the SEA is framed by different scheme stages e.g. construction, operation/maintenance and decommissioning. It is therefore directly relevant at all these stages that not only are actions taken to safeguard known heritage assets, but that there will always be the potential to damage or disturb as yet undiscovered heritage assets in the marine environment.

SEA objectives (Table 26) – It is apparent that the focus for the assessments presented is on negative effects and while we acknowledge the attention given to possibility of beneficial effects at the project level (e.g. increased sedimentation allowing for in-situ burial of heritage assets),

more attention was warranted at a strategic level on positive effects. For example, the Offshore Energy SEA 3 (Environmental Report, 2016), includes the objective to contribute to archaeological knowledge. It is directly relevant to this plan level SEA exercise to reinforce the importance of scheme specific surveys and actions necessary to prevent loss of marine archaeological resources. It is also important to acknowledge how the UK Marine Policy Statement (MPS) and published English Marine Plans, recognise that the lack of designation for some heritage assets does not necessarily indicate a level of lower significance and the potential for heritage assets to be discovered. The statement made that “All new archaeological discoveries are reported in line with legislative requirements” is too simplistic and inadequate compared with the appropriate and proportionate attention given to all heritage assets and the importance of gaining new knowledge to inform subsequent decision-making. We encourage you to address this matter so that this assessment conforms to UK Government policy, as demonstrated through all Offshore Energy SEAs produced to date.

3.2.8 Cultural Heritage (page 209). The Key Issues described here would benefit from greater consideration of the historic environment, especially in relation to setting. For example (bolded text suggested for inclusion),

- Potential for direct or indirect effects on marine, coastal and terrestrial designated and non-designated archaeological and architectural heritage **and settings** due to development altering decay or erosion processes.
- Potential for direct or indirect effects on coastal designated and non-designated architectural heritage **and settings** during construction of new onshore infrastructure such as converter stations or **offshore interventions**.
- **Potential for direct or indirect effects on designated and non-designated archaeological and architectural features and their settings from the presence of new onshore or offshore infrastructure.**
- Potential for the discovery of new cultural heritage features during construction, **and for recording and sharing learning from these sites/ features.**
- **Potential for positive outcomes for conserving and enhancing the historic environment.**

The Key Issues could also be updated to include other onshore and offshore heritage designations such as historic wrecks, submerged landscapes, scheduled monuments, and registered battlefields, for example.

Section 8.1 Potential effects (page 268). Defines the main strategic potential effects by SEA chapter. For cultural heritage and for landscape seascapes and visual amenity, there is no reference made to settings, which may be relevant for both offshore and onshore interventions.

Section 10.1.2 Mitigation by Environmental Effect (table 40) for the SEA topic “cultural heritage” under “offshore cabling” contains some inaccurate statements which could benefit from amendment. For example, these include

- “Site surveys or trial trenching” which is never a mitigation option in the offshore area during the “project planning phase”. Furthermore, trial trenching” is never considered a viable investigative measure in the offshore area as it cannot physically replicate trial trenching as is conducted terrestrially.
- “Relocation of the proposed activities” this does not happen during (EIA) project planning phase as all high-resolution survey and engineering design options are only ever decided post-consent.
- Geotechnical surveys cannot reveal the presence of “unknown wreck locations” unless the borehole or vibro-core physically hits a buried wreck – which would be a major and expense mistake.
- The part about Protection of Wrecks Act 1973 is equally alarming as no seabed disturbing activity as they are trying to describe here would ever be allowed by Secretary of State DCMS within the 1973 Act exclusion zone of a nationally important, designated historic shipwreck site.
- It is also very important to acknowledge that designated heritage assets (under with the 1973 or 1979 Acts) only exist within the English Inshore Marine Planning Area. Heritage Assets are found in the English Offshore Marine Planning Area (i.e. beyond 12 nm miles of the English sector of the UK Territorial Sea) but cannot be designated.
- Coastal process assessment is not specifically conducted for archaeological purposes which the text seems to suggest, only as part of the general environmental assessment exercise so will not highlight at risk heritage assets. This detail is only covered in specific EIA chapters for the terrestrial/intertidal historic environment.
- Adherence to the JNAPC code is also incorrect and almost 20 years out of date. Firstly, the code was published by an NGO and has no formal government policy status and secondly the NPSs are very clear about viable mitigation measures which are to be produced in consultation with national curatorial bodies within the UK (i.e. Historic England).

No explanation was provided about key mitigation measures, specifically marine archaeological Written Schemes of Investigation (including public archiving duties) and offsetting measures through agreed reporting protocols for archaeological discoveries.

Section 10.2 Monitoring. We welcome action to conserve and enhance heritage assets, regardless of designated status. We note that the objective description to protect international, national and local heritage designations and their settings does not appropriately recognise the UK MPS and therefore requires amendment to be aligned with UK Government policy.

Potential for cumulative and in-combination effects. Areas have been identified where there is greater potential for these effects as projects associated with implementation of the draft HNDIP at construction stage and/or during the long-term operational stage. These areas are described as East of England, Offshore of Lincolnshire Connection Node, and Celtic Sea, we agree with this conclusion and add that such effects must be considered inclusive of loss of long-term access to heritage assets in order to complete this SEA exercise (see also our response to question 3).

Historic England would like to draw attention to its MDE Heritage Accelerator (MDEHA) project (<https://historicengland.org.uk/advice/planning/infrastructure/renewable-energy/accelerating-clean-energy-offshore/>), which is significantly increasing the amount of heritage information available to inform marine development. The MDEHA project is adding detailed heritage information from previous Environmental Assessments and post consent investigations to the Marine Data Exchange (MDE) maintained by the Crown Estate. MDEHA is also using this information to enhance the Marine Historic Environment Record (Marine HER) that Historic England looks after. The Marine HER is currently undergoing a major refresh that includes its extension to the full extent of the UK Marine Area off England, rather than the territorial sea as previously. As a consequence of the MDEHA project, the Marine HER will provide a more comprehensive and richer source for future Environmental Assessments accompanying implementation of Holistic Network Design. It will also be useful in supporting SEA monitoring and revision, as well as informing marine spatial planning (including the revision of Marine Plans and development of the Marine Delivery Routemap). The MDEHA project is being funded by the Crown Estate through its Offshore Wind Evidence and Change (OWEC) programme.

Further sources of robust baseline heritage data sets to reference can be found at Historic England's [Open Data Hub](#) which includes [National Heritage List for England \(NHLE\)](#) data (the only official up to date register of all nationally protected historic buildings and sites in England). The data hub allows easy access and integration to planning data with other systems. In addition, [Historic Environment Records \(HERs\)](#) provide access to comprehensive and dynamic resources relating to the archaeology and historic built environment of a defined geographic area and are regularly updated.

5. Do you have any suggestions to improve future consultations?

No comment

6. How should we handle your feedback?

Non-confidential

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