

Offshore Energy SEA5 Scoping
Department for Energy Security and Net Zero
AB1 Building
Crimon Place
Aberdeen AB10 1BJ

Your Ref: OESEA5 Scoping

6th March 2026

Dear Sir/Madam,

Offshore Energy

Strategic Environmental Assessment Scoping Report

Consultation response

This is the corporate response by the Historic Buildings and Monuments Commission for England (Historic England), which 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 in England.

We understand that this Strategic Environmental Assessment (SEA) Scoping Report 5 (dated January 2026) is designed to assess the implications of a public draft plan or programme for leasing/licensing in relation to:

- offshore wind;
- wave and tidal energy;
- offshore gas storage, including of carbon dioxide and hydrogen;
- offshore hydrogen production and transport; and
- the granting of Transitional Energy Certificates for offshore oil and gas exploitation to manage existing fields for their lifetime

In reference to offshore wind, we are aware that the Clean Power 2030 Action Plan (UK Government) identifies a need for 43-50GW of offshore wind capacity across all UK waters by 2030 to meet decarbonisation targets. Furthermore, to maintain the required capacity to 2050 (allowing for decommissioning) Government is seeking to secure at least 12GW of offshore wind capacity and that 20-30GW of new seabed rights could be made available by 2030 (such as illustrated in SEA Scoping Report, Figure 3.7). We note that for wave, tidal stream and tidal range designs are not specified.

The attention given to marine (spatial) planning in section 3.3.3 is important including mention of the Defra-led Marine Spatial Prioritisation (MSPri) programme, as well as the revision exercise for the English East Marine Plans (inshore and offshore), led by the Marine Management Organisation (MMO). It is also apparent that this SEA will be informed by other information streams such as The Crown Estate's Marine Delivery Routemap. Acknowledgement that consent applicants and competent authorities should take into account relevant marine plans is also noted, particularly, in situations where other energy options could be possible, such as hydrogen production, transport and storage.

We have prepared the rest of this response in reference to the consultation questions:

- 1) *Do you have any comments on the key marine energy resource areas and likely scale of aspects of the draft plan/programme to be considered in OESEA5?*

We appreciate the details and explanations provided regarding how the marine energy resource areas are identifiable. For Historic England, the strategic assessment delivered by this exercise will need to include sufficient information and data about the historic environment, as defined by the UK Marine Policy Statement and Overarching National Policy Statement for Energy (EN-1) published by Department for Energy Security & Net Zero (December 2025). Regarding scale, it is important that consideration of the historic environment encompasses places, such as prehistoric landscapes, containing archaeological sites, as well as specific archaeological and historic sites (e.g. shipwreck) and monuments. In a marine context, heritage assets include ships, vessels and boats from all eras of maritime activity and other sites that might now be found at sea such as aircraft crash locations or military vehicles involved in amphibious assault.

- 2) *Consultees are invited to highlight additional initiatives which they consider are relevant to the draft plan/programme.*

We appreciate the focus for attention on statutory measures (vis. Environment Act 2021 etc.) as relevant to plans and programmes to address aspects of the environment (e.g. biodiversity, habitats, flora and fauna), however, regarding the inclusion of "landscape/seascape" (Section 4.3) we offer the following clarifications:

- In "local" amend "English Heritage Historic Landscape and Seascape Characterisations" to Historic England Historic Landscape Characterisation; and
- Commercial Renewable Energy Development and the Historic Environment (2021) should be referenced as published by Historic England, Advice Note 15.

The attention given to the historic environment (e.g. listed buildings and UNESCO World Heritage Sites) is important and should be considered a key component in any subsequent assessment and requires effective cross referencing with inclusion of

cultural heritage. In SEA Scoping Report sub-section 4.9.1 we provide the following clarifications:

- The text should acknowledge that the principal forms of marine heritage protection in the UK includes the Ancient Monuments and Archaeological Areas Act 1979 which is used to schedule sites within the English Inshore Marine Planning Area. It is important to note that scheduling encompasses heritage assets other than shipwreck.
- When referencing the Convention on the Protection of Underwater Cultural Heritage (CPUCH) the accompanying text should have explained that regarding the principles of CPUCH, the UK government recognises the Rules of the Annex to this convention as setting out best practice for underwater cultural heritage. These principles are already applied to designated heritage assets within the 12 nautical mile limit and are also applicable to marine licensable activities as may be directed at non designated heritage assets within English Inshore and Offshore Marine Planning Areas, in alignment with the provisions of the Marine and Coastal Access Act 2009 and the UK Marine Policy Statement (2011).
- The text about Marine and Coastal Access Act 2009 and the designation of Marine Conservation Zones (MCZs) does not accurately reflect the provisions in the Marine and Coastal Access Act 2009 (as amended). Regarding the historic environment, the 2009 Act, through section 117 sets out the grounds for designating MCZs to protect certain species, natural habitats, geological and geomorphological features. Sub-section 117(7) states that when designating a MCZ, the designating authority (i.e. Secretary of State, Defra) may have regard to economic and social consequences of designation and sub-section 117(8) specifies that the term “social” includes “...any sites in that area (including any sites comprising, or comprising the remains of, any vessel, aircraft or marine installation) which are of historic or archaeological interest.”

3) *Consultees are invited to draw attention to and provide (where relevant/possible) additional information and data sets which they consider of potential relevance to this SEA*

Sub-section 5.3.2 (Geology substrates and coastal processes) summarises both geological and geomorphological knowledge and while we recognise the attention given to geological analysis conducted in the 1960s and 1970s for oil and gas prospection, this summary should also acknowledge the considerable survey and analysis that has been conducted in conjunction with the expansion of offshore marine renewable energy developments. In particular, in the southern North Sea, the accumulation of geophysical

and geotechnical data as part of shallow seismic investigations that have revealed the complexity of palaeo-environmental landscape scale changes over the Quaternary period (last 1.5 million years). We therefore take this opportunity to refer you to the technical reporting that can be accessed through OASIS (Online Access to the Index of archaeological investigationS'). Furthermore, the importance of these investigations was recognised in the *UK Marine Science Strategy 2010-2025* to inform our understanding of climate change as well as isostatic adjustment following the last glacial stadial, as alluded to in SEA Scoping Report Section 5.5.4 (climate change).

4) *Do you agree with the choice of Regional Seas used to help describe the environmental baseline?*

We appreciate that the use of a “Regional Sea” approach allows for a general description of features (e.g. oceanographic, habitats and species) and maritime activities and that a very general summary about the historic environment for all UK marine areas is provided in Section 5.3.9 (Cultural heritage).

5) *Are there any additional environmental problems you consider to be relevant to the SEA?*

It is worth making the point that there should not be a default position that perceives the environment to be problematic.

It is also important for us to clarify mention made in Sub-section 5.5.10.1 (changes to landscape and seascape – implications for SEA) and how the text explains that seascape includes historic seascape. The matter of relevance to this SEA Scoping exercise is that when considering seascape, particularly in how it is defined by the UK Marine Policy Statement and described within National Policy Statement for Energy EN-1, the attention which should be given to Seascape Character Assessments, as used for marine planning (in England). In particular, how such character assessment should encompass archaeological and historic characteristics, as required by the duty imposed through Section 54 of the Marine and Coastal Access Act 2009. Section 5.5.12.1 (Possible disturbance of submerged cultural heritage – implications for the SEA) mentions “...international and national protection measures and planning policy” which broadly reflects the intent of paragraphs 2.6.6.4 and 2.6.6.5 within the UK Marine Policy Statement. The mention given to available industry guidance is important, reflecting National Policy Statement for Energy EN-3 (December 2025) vis. protocol procedures for reporting discoveries. We appreciate that mention is made about how development-led studies can contribute new information about the historic environment and subsequent assessment to produce an Environmental Report should quantify such outputs in reference to archiving through UK OASIS.

- 6) *Are there any additional influences, and supporting data sources, on the likely evolution of the environmental baseline?*

The attention given to cultural heritage in SEA Scoping Report sub-section 5.6.1.6 is significant in how it acknowledges increasing awareness, which should be considered inclusive of public funded research, as demonstrated by academic research projects (e.g. UK Arts and Humanities supported *Taken at the Flood* project¹). Furthermore, as relevant to this SEA exercise, it is relevant to acknowledge how projects such as Taken at the Flood is seeking to maximise re-use of industry gathered marine survey data at key locations of geoarchaeological interest. We therefore offer this as demonstrating positive aspects of development investigation that can yield multiple public benefits. Furthermore, in reference to updated guidance to industry, we published in 2025 *Marine Geophysics: Data Acquisition, Processing and Interpretation* (second edition)².

- 7) *Are there any additional alternatives that you feel the SEA should reflect?*

We have no comments to offer as relevant to our role and responsibilities.

- 8) *Are there any objectives that you feel should be included or removed?*

In reference to Table 6.1 (SEA topics, objectives and indicators) we agree with the inclusion of the objectives for cultural heritage.

- 9) *Are the indicators for each objective suitable? If not, please suggest alternatives.*

In reference to the objective “contributes to archaeological knowledge” we offer a revision to how the indicator is described such that:

“The reporting of archaeological discoveries follows best practice as a result of plan activities, and that completed and agreed reporting produced by offshore energy projects are deposited with national curatorial bodies through the online system for reporting investigations into the historic environment and linking research outputs and archives.”

- 10) *Do you have any comments on the sources of potentially significant effect for each of the activities covered by the draft plan/programme, including whether they should be scoped in or out of assessment in the Environmental Report?*

In reference to Table 6.2 (Sources of Potentially Significant Effect against Plan Level Activities) we agree with all the activities to be scoped in as relevant to cultural heritage and we confirm that when reference is made to infrastructure construction this is

¹ [Taken At The Flood](#)

² <https://historicengland.org.uk/images-books/publications/marine-geophysics-data-acquisition-processing-interpretation/>

inclusive of all project-related preparatory works (e.g. seabed clearance) and how environmental effects are described e.g. short, medium, long term etc.

- 11) *Are there any additional information sources or existing monitoring arrangements which could be used to inform monitoring of the offshore energy draft plan/programme?*

In reference to Table 6.3 (SEA Indicators and Related Monitoring), for the cultural heritage indicator “Any impact upon the condition of designated sites and features (including impact on their setting) and all other recorded sites and features”, when considering how plan activities could interact with designated protected sites this should be inclusive of cultural World Heritage Sites. Regarding deposit of development-led archaeological reports with national curatorial bodies, please see the text we have provided in response to Question 9.

- 12) *Do you have any comments on the proposed approach to consultation?*

We have no specific comments to offer on the proposed approach, and we look forward to participating in accompanying workshops as mentioned in SEA Scoping Report paragraph 7.1.2 and providing any further comments through subsequent consultation on the Environmental Report, which you expect to be available from mid-2026.

Yours faithfully,

Christopher Pater

Dr Christopher Pater

Head of Marine Planning