

Delivering Clean Power: Commercial Renewable Energy Development and the Historic Environment

Historic England Advice Note 15 (Second Edition)





Summary

Accelerating deployment of renewable energy is central to delivering the government's clean power mission, strengthening energy security and supporting the transition to a more resilient, low carbon electricity system.

A sustainable energy system is needed now, and it can be built with care and consideration for the historic environment. This can be achieved through a collaborative approach, and the application of this Advice Note to the planning and design of renewable energy schemes.

This Historic England Advice Note (HEAN) provides practical advice on how commercial renewable energy developments can effectively consider and manage impacts on heritage assets and support timely, informed decision-making. It is written for all of those involved in commercial renewable energy development, helping them to efficiently and effectively consider heritage issues.

Technologies covered include large-scale development proposals for offshore and onshore wind power, solar photovoltaics (PV) and biomass and energy from waste (EfW). This edition includes updates on national policy and an expanded section on onshore wind that takes account of the UK Government's Onshore Wind Strategy¹ (DESNZ, 2025a); also, it provides further advice on archaeological considerations for solar development.

The Advice Note considers applications under both the Nationally Significant Infrastructure Projects (NSIP) regime and applications under the Town and Country Planning Act (TCPA) regime which require evaluation under Environmental Impact Assessment (EIA) regulations.

Section 1 gives an overview of the renewable energy market trends and key drivers and outlines relevant decision-making processes. Section 2 describes the main historic environment considerations associated with commercial renewable energy development. Section 3 describes the different types of commercial renewable power generation schemes, including further consideration of the connectivity that occurs between offshore and onshore environments.

This document has been prepared by the National Planning Team with support from colleagues across Historic England. It is one in a series of advice notes on the planning system and implementation of national policy and guidance relating to the historic environment. While it supports the implementation of national policy it does not constitute a statement of Government policy itself, nor does it seek to prescribe a single methodology

¹ <https://www.gov.uk/government/publications/onshore-wind-strategy>



or particular data sources. Alternative approaches may be equally acceptable, provided they are demonstrably compliant with legislation, national policies and objectives.

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Front cover: Renewable energy developments near Helpringham, South Lincolnshire. [© Historic England, 34389_009 28 Apr 2025]



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1. Context

Introduction to this Advice Note

1. Renewable energy is central to delivering the UK's decarbonisation objectives and strengthening energy security. Accelerating deployment of renewable generation and associated infrastructure is critical to meeting Clean Power 2030 targets and achieving net zero by 2050.
2. Significant new infrastructure is also required to connect this clean energy from where it is generated (on land or sea) to where it is needed. This is referred to as the **Great Grid Upgrade** (National Grid, 2026).
3. The Advice Note considers:
 - Nationally Significant Infrastructure Projects (NSIPs) and applications for commercial renewable energy development considered under the Town and Country Planning Act (TCPA) regime that require evaluation under Environmental Impact Assessment (EIA) Regulations².
 - Technologies involving large-scale development proposals for wind power, solar photovoltaics (PV) and biomass and energy from waste (EfW). Also, it includes some consideration of energy transmission infrastructure. It does not provide specific advice on other technologies such as interconnectors, carbon capture use and storage (CCUS), hydrogen or battery energy storage systems (BESS) except where these may be an integrated part of a hybrid renewable energy generation development.
4. Intended to support the implementation of historic environment legislation, national policy and related guidance, the Advice Note can usefully be read in conjunction with relevant **Good Practice Advice and other Historic England Advice Notes** (Historic England, 2026a). Alternative approaches may be acceptable, provided they are demonstrably compliant with legislation and national policy.

Who should read this Advice Note?

5. This Advice Note is written for developers, local planning authorities and heritage professionals to advise them on how to take the historic environment into account

² In **March 2026**, the Government confirmed its intention to introduce secondary legislation, under the **Levelling Up and Regeneration Act 2023**, to phase in Environmental Outcomes Reports (EORs) as a replacement for EIA and SEA using a staged, consultative approach aimed at delivering clearer, outcomes-focused environmental protection by the end of 2027.



during the planning, development and delivery of commercial renewable energy developments and associated infrastructure. Community groups and other interested parties may also find it of interest.

6. Also, the HEAN supports Historic England's advice to the National Energy System Operator (NESO)³ on the heritage implications of their work to plan, manage and operate the energy system, and our engagement with the National Grid and other parties on the design and delivery of schemes.

Climate change

7. One of the main drivers to increase renewable energy development is the need to reduce carbon emissions and support climate resilience. Increasing the pace of decarbonisation is crucial for the UK to meet international and national agreements.
8. The Government's **Clean Power 2030 Action Plan** (DESNZ, 2025b) seeks to accelerate the UK's trend of transitioning energy generation away from fossil fuels towards renewables and other low-carbon infrastructure. Renewables' share of total UK power generation in 2025 reached a record high level of 52.5% (DESNZ, 2026).
9. The Government aims to make the UK a clean energy superpower. Historic England supports the transition towards clean power as a way of both tackling climate change and driving sustainable development across England. This Advice Note provides advice on how decarbonisation of energy can be achieved in ways that take the historic environment, on land and at sea, into full consideration.

National Policy

10. National policy for renewable energy development is set out in a range of different documents, including:
 - National Policy Statements (NPSs), covering proposals for Nationally Significant Infrastructure Projects (NSIPs). The National Policy Statement for **Renewable Energy Infrastructure 2025 (EN-3)** (DESNZ, 2025c), read together with the **Overarching National Policy Statement on Energy 2025 (EN-1)** (DESNZ, 2025d), provides the main framework for decisions on renewable energy NSIPs. In 2024 EN-1 introduced a policy of critical national priority (CNP) for the provision of nationally significant low carbon infrastructure. The National Policy Statement for **Electricity Networks**

³ NESO is developing a range of plans at different strategic levels, which include the **Centralised Strategic Network Plan (CSNP)**, the **Strategic Spatial Energy Plan (SSEP)** and **Regional Energy Strategic Plans (RESPs)**. The onshore and offshore historic environment is considered in each of these plans.



Infrastructure, 2025 (EN-5) (DESNZ, 2025e) is also relevant for related development; for example, the routing of new overhead lines and the approach taken with underground power lines.

- **National Planning Policy Framework** (MHCLG, 2024) sets out the government's planning policies for England and how these are expected to be applied for both plan making and decision taking. The NPPF provides the policy framework within which local plans for housing and other development can be produced and is supported by Planning Practice Guidance (PPG). At the time of updating (Spring 2026), the NPPF is undergoing a major review.
- **National Planning Policy for Waste (NPPW)** (MHCLG, 2014), noting that waste can be used as a fuel to generate energy. The NPPW is also supported by relevant PPG.
- **UK Marine Policy Statement (MPS)** (DEFRA, 2011), providing the framework for preparing Marine Plans and taking decisions affecting the marine environment.

Nationally Significant Infrastructure Projects (NSIPs)

11. Many commercial renewable energy proposals are considered under the NSIP regime established under the **Planning Act 2028** (UK Government, 2008). When a proposed development meets the relevant threshold as a NSIP (see EN-1), it is submitted to the **Planning Inspectorate** who will then examine the application and provide a recommendation to the Secretary of State (SoS) for determination.
12. Decisions by the SoS must be in accordance with the relevant NPSs, except in specified circumstances including where a decision would lead to breach of the UK's international obligations, for example, in respect of World Heritage Sites⁴, or where the adverse impacts of a proposed development would outweigh its benefits (see section 104 of the Planning Act 2008 for further information). Other matters that are relevant will also inform the process. In the marine environment, due regard must be given to the Marine Plans. The consent for a NSIP is termed a Development Consent Order (DCO).

Proposals that require planning permission and other consents

13. For energy projects that are not considered under the NSIP regime, the decision-maker is usually the local planning authority or waste planning authority, depending on the type of development proposed. Such applications for planning permission are determined in accordance with the Development Plan unless material considerations (for example the NPPF or NPPW) indicate otherwise.

⁴ **UNESCO World Heritage Centre - Convention Concerning the Protection of the World Cultural and Natural Heritage**



14. In addition to planning permission, further consents required for development in the marine environment include a marine licence (which is managed by the Marine Management Organisation (MMO)), and a seabed lease. Given their scale, most commercial offshore wind farm projects will qualify as NSIPs. If the permission is granted in these circumstances, the resulting DCO will contain a deemed marine licence. However, a specific seabed lease will also be required, which is sourced from **The Crown Estate**.
15. Scheduled monuments may be located on land, within the intertidal area or on the seabed within the English Inshore Marine Planning Area (as defined by the **Marine and Coastal Access Act 2009**) (UK Government, 2009). Under the TCPA regime, if a scheme includes works to a scheduled monument, Scheduled Monument Consent (SMC) will be required, in addition to planning consent. For NSIP schemes, SMC will form part of the DCO. Historic England welcomes early pre-application discussion to de-risk projects, inform design and support quicker decision-making. Historic England has published **notes for applicants** (Historic England, 2019a) for SMC.
16. If a development proposal for commercial renewable energy development is likely to result in works affecting a listed building, formal pre-application discussion with the local planning authority is recommended to provide the applicant with greater certainty about what is required, including any need for Listed Building Consent (LBC). LBC is not required for NSIPs as this will form part of the DCO.
17. Within the English Inshore Marine Planning Area other designated heritage assets may be encountered including historic shipwrecks designated under the **Protection of Wrecks Act 1973** (UK Government, 1973). Activities that may impact any site designated under the 1973 Act will require separate licensing to any DCO held; for further information about the licensing system to access historic shipwrecks designated under the 1973 Act, please **see Historic England's website** (Historic England, 2026b). More information about regulatory matters for wrecks as might be encountered within the UK marine area is available from the **Maritime and Coastguard Agency**.
18. Remains of military aircraft and vessels are afforded protection under the **Protection of Military Remains Act 1986** (UK Government, 1986). All crashed combat aircraft (whether on land or lost at sea) are automatically designated as 'protected places' under the 1986 Act, which is administered by the Ministry of Defence (also see Box 5 in Section 3).



Box 1: Cooperating across administrative boundaries

Some development proposals will be strategic in nature and thus cooperation across administrative boundaries will be required. For more information refer to the government's guidance on plan-making (MHCLG, 2018), relevant guidance on strategic planning and The Historic Environment in Local Plans (GPA 1) (Historic England, 2015a). In cases where onshore development is proposed near the border with England and adjacent home nations, or an offshore wind development is proposed on the edges of English marine planning areas, discussions on heritage-related transboundary issues with relevant neighbouring authorities/heritage agencies are likely to be needed.

Environmental assessment of plans and programmes

19. Environmental assessment of policy is needed to help plan-makers consider different policy options and allow the environmental, economic and social impacts of proposals to be taken into account. It is currently⁵ done with the help of Sustainability Appraisals (SA) and Strategic Environmental Assessments (SEA). Advice on SA and SEA and the consideration of heritage issues is included in Sustainability Appraisal and Strategic Environmental Assessment (HEAN 8) (Historic England, 2016a).
20. The heritage implications of offshore energy plans and programmes are considered at a strategic level via the UK Offshore Energy Strategic Environmental Assessment (OESEA4) (DBEIS, 2022).

Environmental assessment of other project proposals

21. Under the current system⁶, proposals for large-scale renewable energy power generation are likely to require Environmental Impact Assessment (EIA) (MHCLG, 2014). This requires a developer to identify and consider the likely impacts of the proposed development, enabling the decision-maker to take into account the likely significant effects of a proposed development when considering an application for consent.

⁵ See footnote 2 regarding the Government's intention to replace SA/SEA with EORs by the end of 2027

⁶ See footnote 2 regarding the Government's intention to replace EIA with EORs by the end of 2027



22. The **EIA Regulations 2017** (UK Government, 2017) require the production of an Environmental Statement to identify, describe and assess in an appropriate manner the direct and indirect significant effects of the proposed development. It is vital that the impacts of a proposal on the historic environment are properly understood; Section 2 gives advice on how this is done. Historic England encourages early engagement to discuss the potential effects of a new proposal.

Box 2: Dealing with uncertainty: the ‘Rochdale Envelope’

For large-scale energy infrastructure development projects, there are some design aspects which the applicant may want to finalise post-consent, such as height, massing and materials (e.g. the number, size and power configuration of turbines within a proposed offshore array), and the transmission system (e.g. High Voltage Direct Current or High Voltage Alternating Current to the onshore substation). As a result, when preparing a proposal, the developer may wish to include sufficient flexibility to address design uncertainties by using a ‘Rochdale Envelope’ approach under the Planning Act 2008, which can be used to scope the different environmental worst-case impacts of the scheme at the point of submitting the application. Further advice on this approach is available from the **Planning Inspectorate**.

Biodiversity Net Gain (BNG)

23. Biodiversity Net Gain (BNG) is an approach to development designed to leave the natural environment in a measurably better state than before development takes place. BNG requirements apply to most commercial renewable energy infrastructure in England under the **Environment Act 2021** (UK Government, 2021) and associated regulations. BNG is already mandatory for most TCPA developments and is expected to become mandatory for NSIPs from November 2026. Where BNG is required, early consideration is merited as on-site, off-site or strategic habitat delivery may interact with the significance of heritage assets. The potential for co-benefits for biodiversity and heritage can be explored through taking an integrated approach to the historic and natural environment, ensuring that biodiversity gains are achieved in a way that avoids harm to the historic environment, and ideally provide mutual enhancement.



2. Advice on heritage assets and their assessment

Assessing significance and harm in plan-making

24. The historic environment is an irreplaceable resource and the NPPF requires plans to set out positive strategies for the conservation and enjoyment of the historic environment.
25. Effective plan-making relies on a robust understanding of significance⁷, supported by expert advice and collaboration with archaeological and conservation specialists where appropriate. This approach helps to identify potential heritage issues and promotes policies that integrate heritage considerations into development proposals from the outset. Detailed policies regarding commercial renewable energy development help to secure adequate assessment of the impacts of proposed developments on the significance of heritage assets, including the contribution made to significance by their setting and increase certainty within the planning process.
26. It is recommended that policies provide clear, criteria-based references to both designated and non-designated heritage assets and their settings, explicitly state requirements for heritage impact assessments (HIA) and landscape and visual impact assessments (LVIA) (which are separate but linked studies) during the planning application stage, and ensure cumulative impacts are considered.
27. In England, the development plan comprises a collection of documents which undergo Examination and are tested for Soundness. These include Local Plans, Spatial Development Strategies (SDS), Minerals and Waste Plans, Neighbourhood Development Plans, and Supplementary Plans. While SDS set a strategic framework for growth across wider areas (for example, combined authority geographies), and while they may identify general or broad areas of search suitable for development,

⁷ The NPPF defines Significance (for heritage policy) as “The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site’s Statement of Outstanding Universal Value forms part of its significance”. It defines Outstanding Universal Value as “Cultural and/or natural significance which is so exceptional as to transcend national boundaries and to be of common importance for present and future generations. An individual Statement of Outstanding Universal Value is agreed and adopted by the UNESCO World Heritage Committee for each World Heritage Site”.



they do not allocate sites. Local plans will remain the vehicle responsible for detailed site allocations.

28. Sites and areas proposed for inclusion in plans need to be underpinned by evidence and be informed by an assessment of the impact which their development might have on the historic environment. The methodology for assessment in plan-making will be informed by the size of the proposed sites or areas. Designated heritage assets including World Heritage Sites, registered parks and gardens, registered battlefields, conservation areas and scheduled monuments are typically excluded from larger potentially suitable development areas. Consideration needs also to be given to impacts on significance from within the setting of assets, including, for example, where there are designed views. For site allocations, proportionate heritage impact assessment is likely to be needed, informed by liaison with the LPA's heritage advisers and Historic England.
29. Baseline evidence sources include the **National Heritage List for England** (NHLE) (Historic England, 2026c), **Historic Environment Records (HERs)** (Historic England, 2026d), historic landscape characterisation (HLC) and Conservation Area Appraisals or Conservation Area Management Plans. Integration of NHLE and HER data with existing baseline information such as geophysical and aerial surveys, cartographic sources and deposit modelling can provide a sound evidence base for plan making and should provide an initial indication of where archaeological remains may be present. For relevant further advice refer to **The Historic Environment and Site Allocations in Local Plans (HEAN 3)** (Historic England, 2015b) and **The Historic Environment in Local Plans (GPA 1)**.
30. The plan needs to make clear the degree to which heritage sensitivities (including the presence and location of heritage assets) have informed maps of suitable or preferred areas for commercial renewable energy development and the limitations of the map(s). Furthermore, it is important that the relevant plan policy state the extent to which further heritage assessment is required at the application stage, particularly where there is a known likelihood of archaeological remains of potential national importance.
31. When creating maps of suitable or preferred areas, use of a standard distance to create a buffer zone around identified heritage assets is not recommended. Impacts within the setting of heritage assets which can affect significance vary according to topography and the characteristics of the asset and its surroundings; refer to the section headed 'the extent of setting' in **The Setting of Heritage Assets (GPA 3)** (Historic England, 2017) for further advice on this issue.



Consideration of the historic environment when making a planning application

32. Prior to the submission of an application, the applicant is encouraged to seek pre-application advice from the determining authority (including relevant local authority heritage advisers) and Historic England⁸.
33. Early dialogue with local planning authorities, communities, and statutory consultees builds trust, captures local knowledge, and identifies sensitivities, allowing proposals to be shaped at an early stage to derisk projects and to avoid and minimise harm. This front-loading of evidence and stakeholder input streamlines consents and supports project delivery, may reduce the likelihood of objections, inquiries, or legal challenge, and helps manage cumulative impacts (taking into account other proposed infrastructure schemes). In practical terms, early engagement improves programme certainty, reduces time and cost risk, and leads to better outcomes, including balancing infrastructure delivery with heritage protection, environmental stewardship, and community amenity.
34. Historic England offers free initial pre-application advice to prospective applicants in certain circumstances, such as proposals affecting designated heritage assets, including EIA development. For NSIPs Historic England provides an initial meeting free of charge after which we will commence **cost recovery** (Historic England, 2025a) in line with a scheme agreed with the applicant. Historic England's website provides more information on **pre-application advice** (Historic England, 2025b) and on **when it is consulted** (Historic England, 2025c).
35. Renewable energy developments are more likely to secure timely consents and deliver resilient, high-quality outcomes when they integrate the historic environment as part of their design approach. Understanding the significance of heritage assets and the contribution made by their settings enables developers to shape proposals that respect local character, strengthen identity, and demonstrate good environmental stewardship. Far from being a barrier, heritage can help differentiate projects, build public trust, and create infrastructure that sits harmoniously within its landscape, responsibly supporting both net-zero goals and place-making ambitions.
36. Understanding the historic environment is a key part of site or route selection. This process of assessment starts by consulting relevant data sources (such as the NHLE, local HER and other existing desk-based data sources). Early liaison with the determining authority (including its relevant heritage advisers) and Historic England is

⁸ Refer to the Historic England website for more information on where it is consulted for **development management** and **major development and infrastructure**



strongly recommended. Avoidance of impacts by design is generally preferable to mitigation from both a conservation and cost perspective. Early engagement on Options Appraisals can be an effective way of doing this.

37. Where design options are less likely to completely avoid impacts, early identification of heritage issues supports their minimisation and where appropriate efficient and timely mitigation work. As options become more defined, further iterative stages of investigation and analysis can be deployed using appropriate survey and modelling techniques, and where necessary, targeted intrusive investigations. The timing and prioritisation of intrusive investigations will be affected by factors such as the type, scale and form of the development, design flexibility, likely archaeological potential and engineering constraints. Undertaking evaluation options pre-determination minimises time and cost impacts later on. Once a preferred site or route option has been selected, further heritage and archaeological assessment will support refinement of the scheme. Proportionate, targeted field evaluation will further identify and characterise heritage assets informing design, mitigation and the specification of ancillary works. Detailed assessment will assist the decision maker in a sufficient understanding of significance and in securing appropriate conditions or requirements.
38. Proposals for new works such as cabling, electricity substations, battery storage facilities and other associated works also need to be assessed for their potential impact on the significance of designated and non-designated heritage assets, including from a development within their setting. In doing so, applicants should consider the cumulative effects of the scheme, ensuring that all associated equipment and phased elements are captured within any SEA/EIA process so that the full extent of potential impacts on heritage significance can be properly understood and addressed.
39. When planning electricity generation facilities, it is essential to identify where National Grid Electricity Transmission will connect the generated power to the network. For offshore wind farms, suitable connection points are limited and often located more than 50 km from the cable landfall. The selection of landfall sites and the need for associated infrastructure, such as converter stations and substations, will dictate the general alignment of onshore cabling. Impacts on heritage assets are avoided or minimised by integrating consideration of the historic environment early in the cable route selection process and using that information to inform subsequent route refinement as necessary.
40. When determining a proposal, decisions are made with reference to the Development Plan and any other material considerations (including relevant national policy). Decision-makers must consider the impacts of that proposal on the significance of designated and non-designated heritage assets. Further information on assessing and



understanding significance can be found in **Managing Significance in Decision-Taking in the Historic Environment (GPA 2)** (Historic England, 2015c), **The Setting of Heritage Assets (GPA 3)** (Historic England, 2017), **Statements of Heritage Significance (HEAN 12)** (Historic England, 2019b).

41. National policy states the criteria to use when considering proposals that harm the significance of designated heritage assets; it supports the conservation of heritage assets.
42. Any proposal that would have a harmful impact on the significance of a designated heritage asset will require a clear and convincing justification. Details about the benefits of the proposal will enable them to be weighed against any harm that would be caused to the historic environment.
43. When considering the impact of a proposed development on the significance of a designated heritage asset, decision makers are required to give great weight to the asset's conservation. The more important the asset, the greater the weight should be. This is irrespective of whether any potential harm amounts to substantial harm, total loss, or less than substantial harm to its significance.
44. For NSIPs, national policy (EN-3) highlights the important contribution of large-scale renewable energy projects to tackling climate change, strengthening energy security, and meeting net zero objectives. This is further supported by the Critical National Priority policy in EN-1, which emphasises the need for nationally significant low-carbon infrastructure. Decisions should balance any harm that cannot be avoided or minimised against these benefits on a case-by-case basis, underpinned by evidence, assessment, and relevant policy and guidance, including advice set out in this document.
45. Some nationally important archaeological sites are not designated as scheduled monuments but are demonstrably of equivalent significance. National policy states that in such cases the heritage asset should be subject to the same policy considerations as those that apply to designated heritage assets.
46. National policy (NPPF and UK MPS) is clear that in considering non-NSIP applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset. For NSIP applications, EN-1 requires the determining authority to consider the direct and indirect impacts on non-designated heritage assets (other than those which are demonstrably of equivalent significance to scheduled monuments) on the basis of clear evidence that the assets have a heritage significance that merits consideration in its decisions.



Direct and indirect impacts

47. Commercial renewable energy development has the potential to result in both direct and indirect impacts in the historic environment. Direct impacts upon the significance of heritage assets include those resulting from works to the asset itself (including surface features and buried or sunken archaeological remains) or otherwise affecting its significance, including from the contribution made by its setting. This may be a visual impact or other impact upon the experience or understanding of the asset in its context. Indirect impacts include those which arise as a secondary effect of development but are not a direct result of it.
48. In considering the potential impact on the significance of a scheme within a conservation area, applicants and planning officers are encouraged to refer to relevant Conservation Area Appraisals or Management Plans if available, alongside other relevant sources of heritage data. Other area-based designated heritage assets include World Heritage Sites, registered parks and gardens and registered battlefields. These require specialist advice to understand their significance. Impacts on assets which can cover large areas may be localised to part of the designation, but it remains important to assess how they would affect the significance of the whole asset, rather than considering a part in isolation.
49. In some rare cases, archaeological sites and heritage assets are of such importance or sensitivity that they need to remain undeveloped for their significance to be appropriately maintained. For example, conserving the significance of important or sensitive archaeological remains in an open area of grassland within a development site such as a solar farm may be an appropriate solution, assuming the impacts on the significance of those remains are acceptable. In other instances, other design solutions may be appropriate where they better conserve significance.
50. Buried archaeological remains on land, on the coast or on/within the seabed can be damaged or even destroyed by operations such as:
- Intrusive ground investigation
 - Engineering operations to prepare the site for construction, temporary works, excavation, foundations, piling, anchors, scour protection, and buried service installation
 - Landscape works (earth movement and/or planting of trees and other vegetation for screening, installation of fencing and accesses)
 - Planting and harvesting of biomass crops
 - Installing connection(s) within the development and to the national power grid (if appropriate)



- Installing connection(s) to a local heat network (if appropriate e.g. for biomass or energy from waste facilities)
 - Installing connection(s) to the national gas transmission network (if appropriate e.g. for biomass or energy from waste facilities)
 - Off-site works, such as those related to highways
 - Post-construction intrusive operations relating to the repair, maintenance and improvement of the site e.g. re-powering
 - Decommissioning and any restoration of previous land use, quality and condition
51. As a result, an iterative, evidence-based approach is needed to consider the archaeological interest of a development proposal on a project-by-project basis taking into account both immediate and potential longer-term effects e.g. for offshore/coastal development seabed erosion caused by scour around foundations where hydrodynamic modelling may be beneficial.
52. Underground and overhead pylon connections to the grid have different physical and visual impacts and options will need to be developed and considered on a case-by-case context specific basis.
53. Assessing the heritage impact of a scheme entails a staged, proportionate approach either as part of an Environmental Statement or a standalone Heritage Impact Assessment (informed by pre-application advice and where required by a scoping consultation). In an iterative process of investigation and analysis each stage informs the next, starting with a desk-based assessment (DBA) that integrates a broad range of sources followed up with non-intrusive field investigation techniques (such as deposit modelling, fieldwalking and geophysical survey) and with, as necessary, targeted intrusive investigations (trial trenches / test pits etc) see **Planning and Archaeology (HEAN 17)** (Historic England, 2022).
54. More information on DBAs is available from the **Chartered Institute for Archaeologists** (CIfA, 2014). Relevant advice and guidance covering areas such as **geophysical survey** (Historic England, 2025d) and **deposit modelling** (Historic England, 2020) is available from the Historic England website.
55. Informed by non-intrusive assessment and analysis, some level of proportionate, targeted intrusive investigation is often needed prior to determination to inform the decision in accordance with national policy. In the case of solar schemes, the particular characteristics of these developments frequently allows the majority of targeted trenching to be done post determination. This relies upon non-intrusive work being thorough and well-integrated via a landscape archaeological approach, and on the basis that the scheme design can and will be amended to respond flexibly to the significance, importance and sensitivity of remains. For mitigation to be timely and



cost-controlled, project planning post-consent needs to allow for further phased and targeted investigation. Please see **Archaeology and solar farms Good Practice Guide** (CIfA, 2026) for further information. Onshore wind and pylons also have the potential for post-consent design flexibility through micro siting although their physical and spatial characteristics differ and this is reflected in differing approaches to assessment. A sufficiently detailed approach to archaeological assessment provides the decision maker with confidence as to the planning balance of harm versus benefit and that impacts can and will be avoided when appropriate to conserve significance, and minimised and mitigated proportionately.

56. The deployment of further assessment, design and mitigation should be supported by a coherent suite of archaeological documents with clear dependencies. The naming and content of documents remains inconsistent across the archaeological industry and requires clarity. The applicant should ensure their submission provides a complete legible process with provision for archaeological advice, monitoring and approval to be secured by conditions/requirements.
57. Confidence in post-consent outcomes is supported by submission of an archaeological mitigation strategy (AMS) or outline written scheme of investigation (OWSI) as part of the application, setting out how any further post-consent assessment will inform the final design and mitigation approach. Conditions or requirements for post-consent archaeological work will provide for the submission and approval of detailed Written Scheme(s) of Investigation (WSI) with reference to the submitted AMS/ OWSI. Where there is to be an iterative process of post-consent work, conditions / requirements will need to secure that process. WSIs are submitted to the determining authority for approval and where appropriate also Historic England. Where mitigation options include preservation of archaeological features within the site (for example under roads or in areas of low impact development), advice in **Historic England guidance on Preserving Archaeological Remains** (Historic England, 2016b) may be relevant.
58. **Managing Significance in Decision-Taking in the Historic Environment (GPA 2)** (Historic England, 2015c) includes a section on WSIs and an example planning condition that supports a phased approach. Guidance on WSIs for offshore wind development is set out in **Archaeological Written Schemes of Investigation for Offshore Wind Farm Projects** (The Crown Estate, 2021). Where an archaeological consultant is acting on behalf of the developer, they would need to be suitably experienced (refer to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017). To ensure quality and accountability WSIs submitted for the staged discharge of conditions/ requirements need to be detailed documents specific to the contractor and specialists undertaking the work.



Box 3: Peat environments

Peat environments help to preserve biological evidence of prehistoric environmental conditions and so provide an important means to understand changes that have occurred. The information such deposits may contain on past landscapes, climates and human interaction with those environments needs to be analysed, reported, archived and published to increase our knowledge and promote public understanding. For example, along sections of the north Norfolk coast it is possible to encounter sedimentary sequences such as the 0.5-2 million years old Cromer Forest Bed formation, which comprises layers of sediment containing fossils and stone tools thought to relate to the course of a prehistoric river, now part of today's coastline. Guidance on the development of onshore wind on peatland can be found in Assessing onshore wind applications. Guidance for local planning authorities in England (Regen, 2026)⁹. The Government also committed in EN-3 of the National Policy Statements to publish additional guidance for England for onshore wind and peatland in due course. Further advice on peatlands can be found in Historic England's Peatlands and the Historic Environment: An introduction to their Cultural and Heritage Value (Historic England, 2024).

59. For NSIPs which span land and sea, such as offshore wind farm proposals, two outline or draft WSIs are prepared and submitted as part of the Development Consent Order (DCO) application to inform the examination and subsequent decision-making process. These will address separately:
- Any area subject to terrestrial planning controls (e.g. the corridor for electricity transmission cables to any new convertor station and any new National Grid sub-station connection point).
 - Any area subject to the marine licence consent(s) (e.g. the offshore turbine array area and cable corridor route to the coastal landfall location, including any installation across or under the foreshore. In these cases, it is important to ensure the two documents are complementary and work together to ensure compatibility.

⁹ To note that 'Assessing onshore wind applications. Guidance for local planning authorities in England (2026)' is not a formal planning policy or statutory guidance and does not replace the National Planning Policy Framework, Planning Practice Guidance, local development plans or National Policy Statements. Instead, it provides an overview of the key considerations specific to onshore wind energy developments and sets out the factors that typically arise, to help support consistent, evidence-based decisions that draw on professional judgement and reflect local context.



60. If a DCO is secured, it will specify conditions and a timeframe within which project-specific archaeological mitigation measures (such as production of an archaeological WSI) needs to be prepared; this may be informed by any outline WSI submitted as part of the DCO application. These WSIs need to be in place within a stipulated timeframe to inform survey investigation programmes which are commissioned by the Consent Holder as necessary to inform the detailed design planning and construction of the development.
61. For both NSIP and TCPA regimes, the conservation of heritage assets is supported by putting into place and implementing suitable management and maintenance plans. These are developed in consultation with the local planning authority and their expert advisors and can be required as part of consent conditions. For management plans that include World Heritage Sites, scheduled monuments, Historic England must be consulted. For other designated heritage assets (such as registered parks and gardens, and registered battlefields), where appropriate, Historic England can also provide helpful expert advice to local planning authorities and developers.
62. Other types of heritage assets, for example buildings and structures, battlefields, lithic scatters, and historic parks and gardens, will require specific investigation and assessment approaches, supported by appropriate specialist input.

Impacts on significance through development in the setting of a heritage asset

63. Setting is understood as the surroundings in which a heritage asset is experienced^{10,11}. Assessment of setting is not a fixed or spatially limited exercise, but an evidence-led evaluation of how a heritage asset is experienced and appreciated within its surroundings and how those surroundings contribute to the assets' significance. This is demonstrated by a **recent study** (Historic England, 2025e) on the significance of Windsor Castle (a scheduled monument and Grade I listed building with multiple associated entries in the Register of Parks and Gardens). The report reveals the important contribution made by setting to the Castle's heritage significance and supports informed and effective decision making in this complex historic landscape.
64. When assessing the likely impacts of a proposal on the historic environment, it is important to consider not only the impacts on identified heritage assets, but also any impacts on the contribution setting makes to their significance. This entails identifying the contribution that the setting of any heritage assets makes to the significance of

¹⁰ **The Setting of Heritage Assets - Historic Environment Good Practice Advice in Planning: 3 (2nd Edition) | Historic England**

¹¹ **National Planning Policy Framework**



those assets and any impact the proposed development would consequently have on the significance. For marine developments this includes an assessment of the impact on the significance that coastal and inland heritage assets derive from their setting, as well as the impact on heritage assets at sea.

65. The assessment also needs to explore potential to avoid or reduce the level of harm as well as appropriate mitigation measures. It is informed by technical analyses and supported by a narrative that sets out what matters and why. **The Setting of Heritage Assets (GPA 3)** (Historic England, 2017) provides detailed advice on setting and its assessment.
66. Impacts may be temporary as a consequence of construction activities, for the duration of the development or, in some instances, permanent. Once measures to avoid or minimise harm have been embedded within the design, any remaining residual impacts on setting need to be understood and appropriate mitigation proposed. In some cases, there may be impacts which continue after the development is decommissioned; these also need to be assessed, and appropriate mitigation or restoration approaches embedded within the proposals.
67. A range of techniques may be used when considering impacts of commercial renewable energy development on the setting of heritage assets. Appropriate visualisations are essential to help to illustrate the potential visual impact of a scheme and how potential harm to the character of an area or to significant views of or from heritage assets (also see Box 4) might be reduced or otherwise mitigated.

Box 4: The use of visual representations to inform assessments

Accurate visual representations or ‘visualisations’ can be a valuable tool when assessing the potential impacts of a development proposal on the significance of a heritage asset and/ or the contribution made by its setting. Different types of visualisation techniques can be used, and the technique should be selected based on the purpose of the visualisation, use, sensitivity of the context and environment, and best assess magnitude of the effect. It is important that any visualisations used:

- fairly represent what people would see from the viewpoint location
- be used as a tool for supporting detailed assessment in the field, and
- consider the main, energy-generating component(s) of the development, as well as other elements in the proposed development that have potential to be visually intrusive.



Visualisations need to also take account of seasonal differences in the selected viewpoints and consider the need to illustrate the visual effect during both day and nighttime hours. Agreeing the technique, location and number of visualisations used with the local authority or planning inspectorate (as appropriate) is recommended. Sequential views help to understand the experience of moving through the landscape which can relate directly to the significance of designated heritage assets. They can be used to assess significance for such assets as well as developments that have multiple elements or where they might occur in combination with other elements or developments.

For commercial renewable energy developments, Historic England's experience highlights the importance of using base photography from agreed viewpoints using a full frame sensor and 50mm focal length prime lens. This combination is regarded as the best practice method for capturing images that are closest to human eyesight. This ensures that the visual impact of a new development is portrayed as accurately as possible. It is also recommended that baseline photography is captured in the winter months to support understanding of the worst-case scenarios of the development. For further information, refer to the Landscape Institute's Technical Guidance Note TGN 06/19 on the Visual Representation of Development Proposals (Landscape Institute, 2019).

The locations of robust, metric representations need to be meaningful in terms of the significance of assets which may be affected. To do this it is necessary that visualisation work is well integrated with setting analysis further to Historic England's GPA3. Whether images are simply showing the extent of a development in a view, wireframe/outline representation or a full 3D rendered image, accuracy and methodological transparency are essential.

68. Landscape and Visual Impact Assessment (LVIA) of development proposals may be required as part of an Environmental Statement or as a contribution to the appraisal of development proposals and planning applications. Assessments of landscape character and visual impacts should follow the Guidelines for Landscape Visual Impact Assessment, and relevant notes and clarifications, published by the Landscape Institute (Landscape Institute, 2024). The responsibility for more general matters associated with landscape sensitivity rest with Natural England (who have published related landscape sensitivity assessment guidance (Natural England, 2019)) and the local planning authority.
69. Assessment of visual impacts differs from the assessment of setting impacts because, while the impact of development in views under LVIA is on the viewer, as receptor, the impact of development in terms of the setting of heritage assets and associated views



is on the significance of the heritage asset. Therefore, while visual assessments are usually based on publicly accessible viewpoints, the contribution that setting makes to the significance of the heritage asset does not depend on public rights or an ability to access or experience that setting. On large-scale projects where LVIA's and the assessment of the impact of proposals on the significance of heritage assets may be carried out by different consultants, it is necessary for the two assessments to be completed in parallel and inform each other.

70. When informed by relevant assessments, the design of a scheme can help to avoid or minimise the landscape and visual impact of a proposal, for example through careful siting, scale and massing of proposed development. This is likely to be important in all development but is particularly important in areas known and valued for their historic character, such as World Heritage Sites, conservation areas, registered parks and gardens or registered battlefields. Landscape mitigation measures need very careful consideration as they are not appropriate in all situations. Bunds or planting, for instance, can themselves be intrusive features in the setting of a heritage asset. Any proposed landscape mitigation needs to be appropriately visualised, presented and assessed in the LVIA. **The Setting of Heritage Assets (GPA 3)** (Historic England, 2017) includes further advice on measures to mitigate the negative impacts of a development proposal.
71. An iterative approach is welcomed to support better design and where possible reduced environmental impacts. When a proposal is amended, it is important to revisit the information supporting an application, as minor changes can affect the acceptability of proposals and their harm on the significance of the heritage asset(s).

Cumulative impacts

72. Given the increased scale and contribution made by renewable energy infrastructure on both land and offshore, it is important to consider the potential cumulative impacts of the proposal. Cumulative impacts need to be assessed on the significance of a historic asset or landscape including the contribution made by its setting in conjunction with other past or proposed developments¹². The focus is on the cumulative impacts of multiple developments/structures upon a particular historic asset or landscape, rather than aggregating multiple small impacts from one scheme upon multiple assets.
73. Cumulative heritage impacts for commercial renewable energy proposals are frequently associated with impacts within an asset's setting, but they can also apply to physical impacts. Either may ultimately result in a change to the significance of a

¹² For World Heritage impact assessment, the cumulative impact of changes since the site was inscribed needs to be assessed.



heritage asset; for example, a development may have hydrological impacts that cause changes to the groundwater level which in turn affects the preservation of waterlogged archaeological remains.

74. When considering cumulative impacts, these commonly relate not only to consideration of the specific type of renewable energy but also to other development and energy infrastructure.
75. The Planning Inspectorate has **published advice** (Planning Inspectorate, 2024) on undertaking cumulative effects assessment (CEA) relevant to NSIPs, noting that the scale and complexity of an NSIP may result in a complex CEA process. It puts forward a four-stage approach to CEA which applicants may wish to adopt. It also strongly advises applicants to take advantage of pre- application consultation with the consultation bodies including the relevant local planning authority(ies) and other interested organisations, to ensure that the shortlist of 'other existing development and/or approved development' identified for CEA is comprehensive and accurate.
76. Historic landscape character assessment can help the decision-maker to review cumulative impacts and the degree to which a proposed development will become a significant or defining characteristic of the landscape. Early discussion between the decision-maker, the applicant and consultation bodies (including Historic England) will help to ensure that historic environment issues are properly addressed and suitable solutions developed.

Transport impacts

77. As stated in EN-1: "The transport of materials, goods and personnel to and from a development during all project phases can have a variety of impacts on the surrounding transport infrastructure and potentially on connecting transport networks, for example through increased congestion. Impacts may include economic, social and environmental effects." For many developments, such impacts are most concentrated during the construction phase and are assessed prior to determination in accordance with national and local policy.
78. For a biomass or EfW facility, transport impacts also arise throughout the operational life of the development. From a heritage perspective, this has the potential to have a significant impact on local amenity and the appreciation of heritage assets. The impact of frequent heavy goods vehicles carrying biomass or waste materials may be especially noticeable in areas known for their historic character, such as conservation areas.



The duration of development and its decommissioning

79. The duration of the development and its associated impacts are often key points that affect the significance of heritage assets. As technology improves and repowering becomes more common, the intended engineering life of many renewable energy developments will increase. For example, some solar farms are now permitted for 60-year lifespans, effectively two generations, a situation potentially not perceived by local residents as temporary.
80. If it is eventually possible to return the area to its former use or appearance, the direct impacts of a development on some elements of the historic environment (for example archaeological remains) will be irreversible. Factors such as these affect the level of harm that a development will cause to a heritage asset and its assessment alongside any public benefits as part of the planning balance exercise. Effective early engagement and collaborative working throughout the development process will help to inform design and ensure impacts on heritage assets are minimised.
81. Once an installation has reached the end of its life, the developer may wish to continue operating the site by repowering the existing asset, for example decommissioning and removing old turbines and introducing newer, more efficient models, potentially also incorporating other types of generation or storage technology. Technological improvements may mean fewer, but larger turbines can be used in repowering. The re-use of an existing site has the potential to avoid the need to develop new sites. However, it is likely issues which can impact upon significance would persist. A review of initial investigations, and if necessary new DBAs are recommended to ensure any heritage assets, including the contribution made by their settings, are not negatively impacted by new works due to repowering. Whichever technology is used, it is recognised that repowering can be an attractive option for operators.
82. If its operational life is not extended, a renewable energy development such as a solar farm or wind farm is usually decommissioned in accordance with its consent. Care is needed to identify the potential impact that the decommissioning activities may have on the historic environment and to avoid or minimise and if necessary appropriately mitigate any harm that may arise; for example, through the routing of vehicles (where possible avoiding areas known for their historic character), adherence to an agreed approach on activities that generate noise (which can impact on the appreciation of heritage assets nearby) or the avoidance of any archaeological remains preserved below ground during construction.



Public benefits

83. In addition to the wider benefits of decarbonisation and energy security, renewable energy developments provide scope to deliver additional public benefits. Archaeological investigation, social prescribing and nature or landscape recovery all provide routes for positive impacts for communities. Recognising local needs through early engagement with communities, local authorities and the voluntary sector will allow for the most impactful results.
84. Archaeological investigations have the potential to create evidence of shared history and be a source of community pride, which can be effectively realised through place shaping strategies. In part this stems from improving public appreciation of heritage and the wider landscape; but also, there is clear evidence that participating in the archaeological process yield health and wellbeing benefits. Linking to social prescribing locally enables targeted social impact for those most in need and will help meet the criteria for public benefit. Sources of further information and case studies include: **Wellbeing Archaeology** (Internet Archaeology, 2026), **European framework for the public benefit of archaeology** (European Archaeological Council, 2024) and **Heritage and Social Prescribing Advice Hub** (National Academy for Social Prescribing, 2026).



The installation yard for Dogger Bank A,B,C Wind Farm at Able Seaton Port, Hartlepool, County Durham. © Historic England Archive, DP486617.



3. Commercial renewable energy developments

Solar farms

85. The number and size of solar farms have increased significantly in recent years because of government policy to support the wider decarbonisation agenda. Solar PV is a proven, scalable technology which can be more easily deployed in comparison to other renewable energy options. Advances in solar PV technology have improved efficiency and reduced costs, making large-scale solar farms economically viable.
86. Any solar farm proposals up to and including 100MW are dealt with under the Town and Country Planning Act 1990, whilst those above this threshold are considered via the NSIP regime under the Planning Act 2008.
87. Assessment of potential heritage impacts of a solar farm will typically cover groundworks, such as those from the supports for the solar panels, cable trenches and hard-standings for access, equipment and Battery Energy Storage System (BESS), if included, security fencing, lighting/cameras, and landscape works. Mitigation may be possible; for example, the design of bases for the panels that create less ground disturbance. The vehicles and equipment used during construction can also damage archaeological remains.
88. **Archaeology and Solar Farms. Good Practice Guide** (ClfA, 2026) sets out principles for good practice and practical advice. Key principles include:
- early and regular engagement
 - a zoning approach based on areas of high / low impact
 - deploying the inherent flexibility of solar developments to avoid archaeological remains identified post consent
 - an emphasis on using a wide range of non-intrusive survey techniques
89. The GPG encourages consideration of moving any or all trial trenching requirements to the post-determination stage. For this to happen, four pre-requisites are referenced:
- the flexibility for design changes and relocation of specific solar farm assets to avoid archaeological sites and features identified after determination needs to be demonstrated
 - the solar farm developer ideally would have undertaken an effective range of non-intrusive surveys at the preapplication stage, or at least as soon as possible prior to the determination stage and ensure that the results are properly synthesised



- in any area of inflexibility or high disturbance, the information provided should be sufficient to demonstrate the presence/absence of important archaeological remains. For areas of high flexibility or low disturbance, sufficient information should be provided to demonstrate that impacts can be managed through design flexibility and archaeological mitigation secured by condition.
 - there needs to be an agreed written scheme of investigation (WSI) secured by planning condition/DCO Requirement that sets out a post-determination programme for design development and targeted trial trenching to devise an appropriate mitigation strategy.
90. Where these pre-requisites cannot be met and archaeological advisors require a greater proportion of pre-determination trial trenching, it is incumbent on those advisors to provide reasons why pre-determination trial trenching of any low ground disturbance areas is required to come to a planning decision. Historic England considers advice within the GPG provides proportionate and cost-effective approaches, especially for their use on large scale solar development projects, whether consented through NSIP or TCPA processes.
91. Where solar farms are proposed on previously developed land, it should not be assumed that such sites are devoid of heritage interest. For example, former airfields may contain heritage assets which are not readily apparent or previously recorded, and it is important that assessment of these sites in relation to the historic environment is as rigorous as it would be for other land use types. Further **conservation advice on airfields** (Historic England, 2016c) is available from Historic England.
92. Impacts upon the contribution made to the significance of heritage assets by their setting can be avoided or reduced through an iterative design approach. This is particularly important for assets of the highest importance such as World Heritage Sites, and assets with designed or otherwise important views. Topography and landscape features can be used to inform the scale, layout and massing of solar farms. Additional mitigation screening may also be possible through tree and/or hedge planting. However, care needs to be taken that mitigation measures do not themselves have an adverse impact on the significance of designed views or landscape character (also see paragraph 68 and **The Setting of Heritage Assets (GPA 3)** (Historic England, 2017), for further advice on this issue). A structured approach should be taken to the assessment of impacts on World Heritage Site with reference to the UNESCO **Guidance and Toolkit for Impact Assessments in a World Heritage Context** (UNESCO, 2022), **World Heritage and Renewable Energy - Guidance on Wind and Solar Energy Projects in World Heritage Context** (UNESCO, 2025) and the relevant Management Plan for the property.



Biomass and energy from waste

93. Biomass can be burned in suitably adapted traditional coal-fired power stations or in specialised biomass facilities designed for the production of electricity, heat, or combined heat and power.
94. Although planning consent is not needed for most farming operations, it is helpful if biomass plant applications are informed by a desk-based study and resource assessment within the plant's catchment area, which includes consideration of the area's landscape character and archaeological potential. This exercise is helpful not only because of the potentially significant landscape and archaeological impacts of large-scale energy crop cultivation, but also because of the 'knock-on' effects which any major constraints that are identified could have on travel patterns associated with fuel supply.
95. Large-scale energy crop plantations also have the potential to harm the significance of heritage assets (including through effects within the assets' settings), and compromise the landscape character and visual amenity of the wider landscape, detracting from historic character and sense of place.
96. When assessing potential impacts of a biomass or EfW proposal on the historic environment, it is important to consider all aspects of the proposal, following the principles outlined in Section 2.
97. The need for a stack for flue-gas treatment and the overall size and massing of facilities present significant challenges in sensitive locations, noting that such facilities can cause considerable harm to the significance of heritage assets. Visualisations of the proposed development are needed to better understand the visual impact of a proposal and support the impact assessment (see Box 4).
98. Although the harmful impact of a facility will often be due essentially to the facility's siting, massing and scale in relation to the asset(s) affected, in some cases good design may mitigate such an impact. Fundamental to achieving high quality design will be a sound understanding of the significance of any heritage assets affected, whether at the scale of individual buildings and sites or more extensive historic areas and landscapes.
99. Further detail on biomass is available in the **Biomass Strategy (2023)** (DESNZ, 2023), which sets out the objectives and priorities on the use of biomass in line with net zero targets.



Onshore wind farms

Policy considerations

100. Recent years have seen significant policy changes regarding onshore wind in England. The drive for a clean, secure and affordable energy system by 2030, set out in the **Clean Power 2030 Action Plan** (DESNZ, 2025b), places onshore wind at the centre of the decarbonisation of Great Britain's electricity system. The Action Plan details a national (Great Britain) requirement of 27-29GW of onshore wind by 2030.
101. This policy shift opens the way for increased deployment of onshore wind in England. The **Onshore Wind Strategy (2025)** (DESNZ, 2025a) suggests that up to 2GW of onshore wind will be delivered in England by 2030 through a combination of repowering and new development. This contrasts with the previous 'de facto ban' on onshore wind in England between 2015-2024. The impacts arising from this scale of change necessitate a pragmatic, consistent and proportionate approach that protects the historic environment whilst helping to deliver the renewable energy needed.
102. As stated in Section 1, National Planning Statements (NPS) establish the need case for new energy infrastructure and provide the primary policy framework against which applications for development consent under the **Planning Act 2008** (UK Government, 2008) are assessed. **EN-1 Overarching NPS for Energy** (DESNZ, 2025d), **EN-3 Renewable Energy Infrastructure** (DESNZ, 2025c) and **EN-5 Electricity Networks Infrastructure** (DESNZ, 2025e) are of direct relevance to onshore wind and were updated in 2025. Each NPS provides direction on how effects on the historic environment should be considered and included in decision making.
103. As of December 2025, any onshore wind farm proposals up to and including 100MW are dealt with under the Town and Country Planning Act 1990, whilst those above this threshold are considered via the NSIP regime under the Planning Act 2008.

Changes in technology

104. Technological advances in wind turbine design, generating capacity and associated infrastructure have helped to inform and shape policy changes whilst wind turbine technology continues to evolve at pace. Modern onshore turbines can currently have a blade tip height of 200-250m and can generate 7MW or more; they have a longer operational lifetime of at least 30-35 years¹³. These advances may result in fewer turbines per application but increase the potential for impacts on the historic environment in a variety of ways as set out later in this section.

¹³See **Assessing onshore wind applications** published by the UK Government, Great British Energy and Regen.



Repowering

105. Repowering is the decommissioning and removal of existing turbines. These are typically replaced with newer, more efficient models alongside potential upgrades to associated infrastructure such as new network connection infrastructure and foundations. Repowered sites may also incorporate other types of generation or storage technology. The new turbines will usually be of a different height, capacity and number. Therefore, the site may have a different overall capacity, site layout and footprint from the original consent with renewed construction activity and longer operational lifetimes. This will all need to be considered regarding their potential effects on the significance of heritage assets.

Historic environment considerations: impact on significance through development in the setting of a heritage asset

106. The impacts of onshore wind developments on the historic environment are highly dependent on site-specific factors such as the location and significance of heritage assets, the scale of development proposed, topography and landscape character.

107. Mindful of the key principles for avoiding direct impacts outlined in Section 2, the most commonly associated effects on the significance of heritage assets from onshore wind development are likely to arise from development within the setting of assets, due to the height, scale and movement of turbines and, in some cases, their cumulative presence within wider landscapes.

108. It is recommended that assessment of setting follow the broad approach detailed in Historic England's **The Setting of Heritage Assets** (GPA 3) (Historic England, 2017). This identifies the following five-step process to be applied in a proportionate manner appropriate to the complexity of the proposed development:

- **Step 1.** Identify which heritage assets and their settings are affected
- **Step 2.** Assess the degree to which these settings contribute to the significance of the heritage asset(s) or allow significance to be appreciated. GPA3 includes a box detailing a non-exhaustive checklist of potential attributes of a setting that may help to elucidate its contribution to significance
- **Step 3.** Assess the effects of the proposed development, both beneficial and harmful on that significance or on the ability to appreciate it. Again, GPA3 includes a box with a non-exhaustive checklist to help those undertaking this assessment. For onshore wind, relevant considerations are especially likely to include the height, movement and



visibility of turbines, changes to skyline or horizon views, cumulative effects, noise and night-time features such as aviation lighting¹⁴

- **Step 4.** Explore ways to maximise enhancement and avoid or minimise harm.
- **Step 5.** Make and document the decision and monitor outcomes.

109. With increased turbine heights, and given the density of heritage assets in England, it is recognised that some level of impact on heritage assets and wider historic landscapes is likely to occur. Early engagement with Historic England and the relevant local planning authority's heritage team can help to inform a pragmatic approach to understanding the nature of those impacts. It is necessary to focus on the identification of those assets where setting is likely to make an important contribution to significance and agree an appropriate way forward on detailed impact assessment (see GPA3; The Setting of Heritage Assets). A structured approach should be taken to the assessment of impacts on the significance and Outstanding Universal Value of World Heritage Sites with reference to the **UNESCO Guidance and Toolkit for Impact Assessments in a World Heritage Context** (UNESCO, 2022), **World Heritage and Renewable Energy - Guidance on Wind and Solar Energy Projects in World Heritage Context** (UNESCO, 2025) and the relevant Management Plan for the property.

110. When considering impacts on Protected Landscapes, **section 245 of the Levelling Up and Regeneration Act** (UK Government, 2023) inserted amended provisions in the National Parks and Access to the Countryside Act 1949 so that relevant authorities have a duty to seek to further their purposes in order to facilitate better outcomes. For National Parks their purposes are conserving and enhancing the natural beauty, wildlife and cultural heritage, whilst National Landscapes (formerly Areas of Outstanding Natural Beauty) purposes are conserving and enhancing natural beauty.

111. Where appropriate it may be necessary to consider impacts on Heritage Coasts and the character of historic landscapes. Early engagement with Historic England, and other relevant bodies, such as local planning authorities and Natural England, can assist in exploring relevant issues and what is possible or appropriate.

Historic environment considerations: archaeological impacts

112. Archaeological impacts may arise from groundworks associated with the multiple elements associated with onshore wind farms, including turbine foundations, hardstanding areas (which tend to reduce in size during operation), access tracks,

¹⁴ Onshore turbines with a blade-tip height of 150m or more are generally required to be fitted with visible aviation obstruction lighting in accordance with Article 222 of the Air Navigation Order 2016 as interpreted through **Civil Aviation Authority policy**.



cable trenches, substations and construction compounds¹⁵, with the potential to affect known and unknown archaeological remains.

113. Each element will have different levels of impact and understanding those different levels of impact is essential. This can be established through effective communication from the outset between wind farm developers, local authority planners and archaeological advisers (and other statutory heritage consultees). Early pre-application engagement informs the approach to understanding the archaeological sensitivity of the proposed site area.
114. Though the redline boundary for sites can be very large, sufficient detail is needed within applications to understand archaeological impacts, recognising the elements of scheme design that can flex to protect the significance of important archaeological remains. This ranges from the route of access tracks to site to the location of individual wind turbines within the wider area (avoiding direct impacts on important archaeological remains).
115. The transport routing of major turbine components (for example, if imported from abroad) merits consideration and the need to avoid and minimise harm to the historic environment (for example where historic bridges or structures immediately adjacent to roads may be affected) on the route to the development site.
116. Most applications will be supported by Environmental Impact Assessment (or as stand-alone Heritage Impact Assessment). Work including archaeological desk-based assessments and other non-intrusive studies (such as geophysical survey) forms a baseline and focus for any further investigation, informing the scheme design and the micro siting of turbines (see Section 2 on direct and indirect impacts).
117. The level of existing knowledge about the archaeological potential and sensitivity of an area varies and will influence the approach to data gathering and the techniques that are appropriate and required.¹⁶
118. For onshore wind development drawing on a DBA and non-intrusive survey, proportionate, targeted pre-determination field evaluation is likely to focus on those elements of design and layout which have limited scope for micro siting. Elements

¹⁵ Diagrams of key components of a typical onshore wind farm and turbine are included in **“Assessing onshore wind applications: guidance for local planning authorities in England”** published by the UK Government, Great British Energy and Regen.

¹⁶ **“Planning and Archaeology: Historic England Advice Note 17 (HEAN 17)”** includes a simplified model of the development management process, with typical stages in decision-making where a development proposal has the potential to affect heritage assets of archaeological interest.



where confidence is required prior to determination may include indicative locations for turbines and their foundations and spatially associated construction impacts such as crane pads or access roads.

119. This will require a degree of intrusive archaeological investigation that is informed by liaison with the developer's archaeological advisers, archaeological advisers from the local planning authority and Historic England (as appropriate). A pragmatic, proportionate approach is needed, which gives confidence on archaeological impacts, responds directly to the non-intrusive work already undertaken (answering specific questions arising) and focuses on areas of high impact, sensitivity or importance, where options for design flexibility are more constrained, or cost, time and consenting risks are most acute.
120. Where further work is needed post-determination, this will be secured through planning conditions/DCO requirements, the scope of such works defined within an approved WSI¹⁷.
121. Typically, onshore wind developments result in borrow pits that help to deliver some of the aggregate needed for construction. Borrow pits may themselves generate heritage impacts which need to be understood.

Offshore wind farms and associated transmission infrastructure

122. In 2024 the government published its Clean Power 2030 Action Plan. This stated the UK has the highest offshore wind deployment in Europe. It also detailed the ambition to deploy up to 43-50GW of offshore wind power by 2030, of which up to 5GW would come from floating offshore wind.
123. The electricity generation capacity of offshore wind farms means that commercial scale developments are considered NSIPs. The entire development from the offshore wind turbine array to the onshore conversion and connection facilities represent one project and therefore one DCO application. Given the different regulatory regimes applicable to activities on land and at sea, the DCO application needs to be prepared within a structure that encompasses relevant expertise for both land and sea regimes. Heritage assets can be found in offshore and inshore regions, including within intertidal areas (the area between high tide and low tide marks). Comprehensive guidance on assessing the impacts of offshore wind projects on the marine historic environment is set out in **Evidence Review Note: Marine Historic Environment**

¹⁷ **"Archaeology and Solar Farms: Good Practice Guide"** includes a helpful figure (Figure 1) and supporting text on the process for decision making when applying conditions.



(OWEKH, 2026). Box 5 provides more information on the protection of heritage assets in the marine environment.

124. During the production of an Environmental Statement (ES), in common with proposals for onshore wind development, an applicant will commission geophysical surveys and sometimes geotechnical data acquisition programmes to inform the design of the proposed development. It is therefore of immediate interest to the applicant to ascertain how the proposed seabed infrastructure can be positioned with greatest operational efficiency and in full consideration of how other environmental receptors might be impacted, inclusive of cultural heritage. Through the archaeological interpretation of those data, it is possible to identify seabed and sub-seabed anomalies, which could be of archaeological interest. Further investigation (or avoidance) is recommended if these are likely to be impacted by construction plans. It is also possible for anomalies to be identified that merit further investigation at a later stage.
125. In terms of direct impacts from construction, avoiding heritage assets, including archaeological sites and historic wrecks, is the most effective form of protection. One way this can be achieved, as outlined in EN-3, is through the implementation of Archaeological Exclusion Zones (AEZs) which preclude seabed-impacting activities within their boundaries. The archaeological consultant employed by the applicant will also describe within the Environment Statement how an avoidance strategy (for example, based on the use of AEZs) will be used in reference to the placement of the proposed infrastructure e.g. turbines and electricity transmission cables both within the array and along the export cable corridor to the selected landfall location. The design of AEZs may be refined as more high-resolution survey data is acquired to inform design and delivery of a consented development.
126. It is acknowledged that considerable uncertainty exists in our knowledge of the historic environment including prehistoric environmental evidence that can be found on, within and beneath the seabed. The production of an ES needs to provide sufficient information to characterise the area within which the proposed development could occur. However, post-consent, higher resolution survey data acquisition will be commissioned which will further refine what heritage assets are present. The use of archaeological WSIs onshore and offshore provide an important means for agreeing investigation methodologies and techniques that assist interpretation and analysis. It might be the case that other survey investigations, for example the use of video to examine seabed anomalies to determine the presence of Unexploded Ordnance (UXO), might also confirm the presence of archaeological materials. It is therefore important that a report mechanism is agreed and in place, as part of the DCO, to assist the effective reporting of discoveries of possible archaeological interest and thereby support informed and timely decision-making. To support this approach the



consent holder is advised to secure the services of a 'retained' archaeology service as a component part of post-consent project management and delivery.

127. Within the application there are different aspects of historic character which need to be considered to take account of the offshore environment; for example, how heritage assets may draw part or all of their significance from their coastal location and relationship with the sea. The contribution that setting makes to the significance of heritage assets on land may be affected by offshore development, particularly where heritage assets are grouped together and therefore lead to multiple impacts. When considering the impacts of offshore wind farms within the setting of heritage assets onshore refer to the advice provided above for onshore windfarms.
128. Once constructed, offshore wind farms and the infrastructure placed on and in the seabed may continue to reveal or bury features of possible archaeological interest which merit ongoing assessment by the consent holder's retained archaeological advice service with reporting to Historic England through the wind farm's Construction Environmental Management Plan (CEMP) and/or Operations and Maintenance (O&M) procedures.
129. The construction of onshore facilities to support operations and maintenance (e.g. in ports and harbours) will be subject to their own consenting arrangements, including heritage considerations.

Box 5: The protection of heritage assets in the marine environment

In the marine environment, heritage assets comprise both designated and non-designated assets. Relevant statutory heritage designations include:
Restricted areas designated under the Protection of Wrecks Act 1973 (UK Government, 1973)
Scheduled monuments designated under the Ancient Monuments and Archaeological Areas Act 1979 (UK Government, 1979)

Wrecks of vessels sunk or stranded in military service that are protected under the Protection of Military Remains Act 1986 (UK Government, 1986), which is administered by the Ministry of Defence, may also be heritage assets.

If a proposed development, either on land or at sea (including any intertidal area that might be crossed), encounters crashed military aircraft remains, such sites are automatically afforded statutory protection as 'protected places' (Ministry of Defence, 2013) under the Protection of Military Remains Act 1986. Military aircraft crash sites are administered by the Joint Casualty and Compassionate Centre, an executive agency of the Ministry of Defence.



Wind turbine blade factory, Hull, East Riding of Yorkshire. © Historic England Archive DP598006



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