

2025 Review of energy National Policy Statements Appraisal of Sustainability Consultation Response

Name of responding organisation: Historic England

Name and role of respondent(s): Alison Rood, Senior Policy Advisor, Policy and Evidence

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1. Are there other plans, programmes or environmental protection objectives that should be identified and reviewed as part of the AoS process?

Response (please include page number / section heading to indicate which part of the report comments relate to):

Historic England is satisfied with the plans, programmes and environmental objectives reviewed except for reference to The Heritage Statement 2017 (page 15). This document was updated in 2018 as The Heritage Statement: One Year On. As it was published over six years ago, it's advisable to consult more recent publications or official sources for the latest updates and initiatives in heritage policy.

2. Is there additional information that needs to be considered as part of the baseline data?

Response (please include page number / section heading to indicate which part of the report comments relate to):

Historic England has no substantive comments to make but would suggest amending the following,

Table 1 Summary of national baseline information

- *includes heritage coasts against Historic Environment (page 32). A heritage coast is defined by agreement between the relevant maritime local authorities and Natural England who support the heritage coasts in a variety of ways. Whilst heritage coasts will contain historic assets which will need to be considered, we suggest they are listed under the Landscape, Townscape, and Seascape topic area.*
- *in the Flood Risk and Coastal Change topic (page 33) the reference should be to Shoreline Management Plans not marine spatial plans.*

Table 2 Key designations and land use across the UK

- *This table has omitted listed buildings at Figure 3: Historic Environment (page 35). These should be included.*
- *We also recommend including reference to Historic Environment Records (HERs). HERs are information services that provide access to comprehensive and dynamic resources relating to the archaeology and historic built environment of a defined geographic area. They contain details on local archaeological sites and finds, historic buildings and historic landscapes and are regularly updated. This information is usually held in a database with a digital mapping system (Geographic Information System). There are over 80 HERs in England which are maintained and managed by local authorities as the essential core of historic environment services. Whilst not currently a statutory duty*

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[Section 230](#) of the Levelling Up and Regeneration Act makes provision for HERs to be given a statutory status and requiring local authorities to maintain HERs. We therefore consider it appropriate for the AoS to reference HERs. More details on HERs can be found [here](#)

3. Do you consider that the range of sustainability problems and issues covered is appropriate?

Response (please include page number / section heading to indicate which part of the report comments relate to):

Historic England is satisfied with the sustainability problems and issues identified in the framework.

4. Are there any changes you consider should be made to the proposed AoS objectives and guide questions?

Response (please include page number / section heading to indicate which part of the report comments relate to):

Historic England suggests the inclusion of an additional guide question at Table 1 - AoS Framework for Energy NPS, Objective 5 Protect and enhance cultural heritage assets and their settings, and the wider historic environment.

- *Secure the completion of archiving responsibilities in accordance with best practice.*

5. Do you have further suggestions regarding the scope of the AoS and its proposed assessment of the reviewed NPS?

Response (please include page number / section heading to indicate which part of the report comments relate to):

No comment.