



Historic England

Historic England Response to Scoping for Environmental Report Consultation UK Offshore Energy Strategic Environmental Assessment (UK OESEA3)

04 Sept 2015

Historic England is the Government's statutory adviser on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and champion historic places, helping people understand, value and care for them.

It should be noted that on 1st April 2015, Historic England (formerly known as English Heritage) was vested, whereas the English Heritage Trust (also established on the same date) is now a charity caring for the National Heritage Collection of more than 400 historic properties.

We have commented on previous OESEA's and our response to this consultation is set out below:

Q1 Consultees are invited to highlight additional initiatives which they consider are relevant to the draft plan/programme

2.2 Landscape/Seascape (pp 39-42)

Under 'Local' the Historic England Historic Landscape and Seascape Characterisation for all inshore and offshore areas off England is now complete and available. References to the 'National Heritage Protection Plan 2011-2015 (2011)' should be replaced by 'Heritage 2020' (2015 - <http://www.theheritagealliance.org.uk/historic-environment-forum/heritage2020>) which identifies the priorities for England's historic environment as agreed by the sector for 2015-20. The 'Historic England Action Plan' (2015 - <https://historicengland.org.uk/about/what-we-do/action-plan>) sets out Historic England's contribution to Heritage 2020 and also describes how its Corporate Plan will be delivered. Under 'Key Objectives and Targets' the Historic England (formerly English Heritage) setting guidance 'The Setting of Heritage Assets' has been updated and published in July 2015 (<https://content.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/gpa3.pdf/>).



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2.8 Cultural Heritage (pp 61-63)

Under 'Local' all references to English Heritage should be replaced with Historic England. As discussed above those relating to the 'National Heritage Protection Plan' should be amended to 'Heritage 2020' (2015 - <http://www.theheritagealliance.org.uk/historic-environment-forum/heritage2020>) which identifies the priorities for England's historic environment as agreed by the sector for 2015-20. The 'Historic England Action Plan' (2015 - <https://historicengland.org.uk/about/what-we-do/action-plan>) sets out Historic England's contribution to Heritage 2020 and also describes how its Corporate Plan will be delivered.

The reference to 'conserving and enhancing the historic environment (2014) – England' could perhaps be made clearer as this appears to relate to the Government's 'Planning Practice Guidance'

(<http://planningguidance.planningportal.gov.uk/blog/guidance/conserving-and-enhancing-the-historic-environment/>).

Under 'Key Objectives and Targets' although it correctly states that the UK is not a signatory on the 'Convention on the Protection of Underwater Cultural Heritage (2001)', the UK Government has repeatedly stated that it views the Rules annexed to the Convention as representing best practice for underwater cultural heritage. Again references to English Heritage and the National Heritage Protection Plan require revision in light of the comments given above and footnote 23 is incorrect and should reference 'Ransley et al'.

Other guidance and initiatives that are of relevance to the draft plan/programme include the 'North Sea Prehistory and Research Management Framework' (2009 - <https://historicengland.org.uk/images-books/publications/ns-prehistory-research-manage-framework/>) and the 'European Marine Board Continental Shelf Prehistoric Research Position and Policy Brief' (2014 - <http://www.marineboard.eu/continental-shelf-prehistoric-research-wg-subland>).

The Historic England Good Practice Advice Note 'The Setting of Heritage Assets' (2015 - <http://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>) could again be cited here together with 'Managing Significance and Decision-Taking in the Historic Environment' (2015 - <http://historicengland.org.uk/images-books/publications/gpa2-managing-significance-in-decision-taking/>).



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Q2 Consultees are invited to draw attention and to provide (where relevant/possible) additional information and data sets which they consider of potential relevance to this SEA

The following was published after OESEA2 ‘Offshore Geotechnical Investigations and Historic Environment Analysis: Guidance for the Renewable Energy Sector’ (COWRIE Group, 2011 - <http://www.thecrownestate.co.uk/media/5901/km-ex-pc-historic-012011-offshore-geotechnical-investigations-and-historic-environment-analysis-guidance-for-the-renewable-energy-sector.pdf>) and if OESEA3 also includes tidal power generation then ‘Historic Environment Guidance for Wave and Tidal Energy’ is also of relevance (English Heritage, Historic Scotland & Cadw (2013 - <http://www.historic-scotland.gov.uk/wave-tidal-energy-guidance-nov-13.pdf>).

We note the proposal to prepare an underpinning report providing an overview of archaeology, in particular focussing on any changes in perspectives since previous SEA reports, and would gladly help with this.

Q3 Do you agree with the choice of Regional Seas used to help describe the environmental baseline?

It is assumed that Charting Progress 2 (CP2) Regional Seas is being used for this SEA as it’s probably more aligned to European and international requirements for reporting marine condition/status. However, an EU Framework Directive on Marine Spatial Planning (2014/89/EU) is now in place, so an explanation should be given about the compatibility with CP2 Regional Seas.

Q4 Are there any additional environmental problems you consider to be relevant to the SEA?

The specific reference to potential problems in relation to the cultural heritage in Section 3.5 is noted and we presume this is because so much remains unknown about cultural heritage in the marine environment (especially offshore) and could be discovered within the UK Continental Shelf. We acknowledge this as a potential problem and look forward to working with DECC to address the matter.

For ‘Changes to Landscape and Seascape’ (p. 91) the SEA must address the cumulative impact of offshore wind farm developments given the clusters that now occur off the Wash embayment, within the Thames estuary and off Morecombe Bay. The following is of relevance ‘Guidance for Assessment of Cumulative Impacts on the Historic Environment from Offshore Renewable Energy’ (COWRIE Group, 2008).



Regarding 'Possible Disturbance of Submerged Cultural Heritage' (p. 92), 'Offshore Renewables Protocol for Archaeological Discoveries Palaeoenvironmental Assessment of Peat Samples' (Russell J. W and Stevens C. J (2014 - <http://cmscoms.com/?p=1653>)) is an example of archaeological data interpretations forthcoming from off shore wind farm projects. Similarly, Historic England has supported the publication of advice regarding marine geophysical survey which will help seabed development projects capture data that supports archaeological interpretation and analysis 'Marine Geophysics Data Acquisition, Processing and Interpretation - Guidance Notes' (2013 - <https://historicengland.org.uk/images-books/publications/marine-geophysics-data-acquisition-processing-interpretation/>).

With reference to 'international and national protection measures and planning policy' in considering the 'implications for SEA' we suggest the Rules annexed to the UNESCO 2001 'Convention on the Protection of Underwater Cultural Heritage' represent best practice (see 2.8 above) and draw your attention to the Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions 'Towards an integrated approach to cultural heritage for Europe' (Brussels, 22.7.2014 COM(2014) 477 final) with reference to the attention given to action to map underwater cultural heritage.

Q5 Are there any additional influences, and supporting data sources, on the likely evolution of the environmental baseline?

For 'Landscape/Seascape' (p. 100) and 'Cultural Heritage' (p. 102) these contain accepted statements and demonstrate the project specific assessments required at EIA.

We have already highlighted the completion of Historic Landscape and Seascape Characterisation for all inshore and offshore areas off England (see Q1 above) and the Rapid Coastal Zone Assessment Programme is referred to in the table under Section 3.3.9 (p. 77).

Our Good Practice Advice Notes on 'The Setting of Heritage Assets' (2015 - <http://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>) and 'Managing Significance and Decision-Taking in the Historic Environment' (2015 - <http://historicengland.org.uk/images-books/publications/gpa2-managing-significance-in-decision-taking/>) provide guidance on understanding the significance of heritage assets and their setting together with the potential impact of any future development.



Q6 Are there any objectives that you feel should be included or removed?

We note the SEA objectives and have nothing further to add.

Q7 Are the indicators for each objective suitable? If not please suggest alternatives

Under the SEA Objective for Landscape/Seascape the column 'SEA Indicators' contains the following: 'Trajectory of change in coastal National Character Areas shows no adverse effects arising from plan activities.' When using the term 'trajectory' attention should also be given to identifying how any perceived character might accommodate change (or not), for example, change from one marine industry such as oil/gas infrastructure to the establishment of offshore wind farms.

For Cultural Heritage the 'SEA Indicators' also present an opportunity to address the potential problems highlighted in Section 3.5 (see Q4 above) by supporting the development of new information that expands our knowledge and understanding about cultural heritage found in the marine environment (inclusive of foreshore). The following is suggested: 'The completion and deposit with national curatorial bodies of archaeological studies produced by offshore energy projects'. Such an indicator would also address a similar point made in the 'National Policy Statement EN-3 (Renewable Energy, paragraph 2.6.142' [...contribution of new knowledge that arise from investigation']).

Q8 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 Environment Report?

Having reviewed Table 4.2 we agree with sections on 'Landscape/Seascape' and 'Cultural Heritage'.

Q9 Are there any additional information sources or existing monitoring arrangements which could be used to inform monitoring of the offshore energy draft plan/programme?

Under Table 4.3 'Cultural Heritage' the indicator should be amended as follows: 'No adverse impact upon the condition of designated sites and features (including impact on their setting) and minimal impact on all other recorded or discovered sites and features.' This will enable the indicator to take account of UK Marine Policy Statement and NPS EN-3.

Also under 'High Level Monitoring Outcomes and Relevant Links' the reference to 'National Monuments Records' should be replaced with 'records maintained by national curatorial bodies in the UK'.



Q10 Do you have any comments on the proposed approach to consultation?

We have previously attended workshops relating to other OESEA exercises and would be willing to do so again, and as mentioned in the response to Q2 are prepared to contribute to the proposed underpinning report on archaeology.

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