



Historic England

Offshore Energy SEA4 Scoping
AB1 Building
Crimon Place
Aberdeen
AB10 1BJ

7th May 2021

Dear Sir/Madam,

**UK Offshore Energy Strategic Environmental Assessment
Future Leasing/Licensing for Offshore Renewable Energy, Offshore Oil & Gas
and Gas Storage and Associated Infrastructure
Scoping for Environmental Report (March 2021)**

Further to your invitation of 29th March 2021 to offer comment on this Scoping Report, we hereby offer the following response.

The role of Historic England

The Historic Buildings and Monuments Commission for England, otherwise known as 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 sponsored by the Department for Digital, Culture, Media and Sport (DCMS). Our purpose is to improve people's lives by championing and protecting the historic environment and our vision is for a heritage that is valued, celebrated and shared by everyone. A historic environment that people connect with and learn from and that we are proud to pass on to future generations.

Offshore Energy Strategic Environmental Assessment 4

We are aware that The Department for Business, Energy and Industrial Strategy (BEIS) is conducting an Offshore Energy Strategic Environmental Assessment (OESEA4) of a draft plan/programme to enable future renewable leasing for offshore wind, wave and tidal devices and licensing/leasing for seaward oil and gas rounds, hydrocarbon and carbon dioxide gas storage, and offshore hydrogen. We appreciate that this process is designed to inform offshore energy licensing and leasing decisions by considering the environmental implications of a proposed plan or programme and the potential activities which could result from its implementation.



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Historic England and maritime development

Historic England's involvement with marine development matters were extended under the National Heritage Act 2002 to modify our functions to include securing the preservation of monuments in, on, or under the seabed within the seaward limits of the UK Territorial Sea adjacent to England (12 nautical miles). We also provide our advice in recognition of the English marine plan areas (inshore and offshore), as defined by the Marine and Coastal Access Act 2009, National Policy Statements, the UK Marine Policy Statement and the policies of published or draft Marine Plans.

We note that the Scoping Report includes consultation questions which we have answered as relevant to the role and responsibilities of Historic England.

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

In reference to World Heritage Sites we are aware that UNESCO is currently undertaking a study on renewable energy and World Heritage (<https://whc.unesco.org/en/renewable-energy/>), which is due to report in 2021. The aim of this project is to develop guidance to help prevent conservation issues at World Heritage properties from the adaptations necessary to cope with climate change, and indeed to look for ways in which renewable energy and World Heritage protection can be complementary. We appreciate that World Heritage Sites are very diverse and can be impacted in very different ways, but by placing an emphasis on understanding the Outstanding Universal Value of these sites is key to understanding impact. UNESCO has also produced a wide range of documents and guidance on climate change to develop understanding of its impact on World Heritage (<https://whc.unesco.org/en/climatechange/>).

The following reference require inclusion within Seascapes (section 4.3):

- Any reference to English Heritage should be amended to Historic England, for example regarding Historic Landscape and Seascape Characterisations – please see: <https://historicengland.org.uk/research/methods/characterisation/historic-seascapes/>;
- Historic England's Heritage 2020 (<https://historicengland.org.uk/content/heritage-counts/pub/2020/heritage-environment-2020/>) and Historic England Corporate Plan 2020-2023 (<https://historicengland.org.uk/about/what-we-do/corporate-plan/>)
- Historic Environment Advice Note – *Commercial Renewable Energy Development and the Historic Environment* (2021) (<https://historicengland.org.uk/advice/planning/infrastructure/renewable-energy/>)

In Cultural Heritage (section 4.9), we noticed reference made to the UNESCO Convention on the Protection of Underwater Cultural Heritage (2001) and therefore we consider it important to draw your attention to how the UK Government has endorsed the Rules concerning activities directed at underwater cultural heritage contained within this convention as representing best practice. We also recommend that acknowledgement is given to cultural heritage policies as contained within either draft or published marine plans produced by the



Marine Management Organisation. Regarding the use of legislation to designate heritage assets within the English Inshore Marine Planning Area, please include the Ancient Monuments and Archaeological Areas Act 1979.

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

5.3.3 Landscape/seascape – It is important that consideration of the interpretation of the concept of landscape and seascape, as used in this section, focuses on perception as a key factor. It is therefore apparent that to weight attention towards “...how changes can affect overall visual amenity” should also allow equal consideration of essential elements of character which are not directly linked with a view per se. In this regard consideration of landscape and seascape should consider the entirety of all forms of character as can contribute to perceptions about a place e.g. ancestral associations, scientific understanding, literature, art, redundant industry, family history and entertainment etc.

5.3.9 Cultural Heritage – it is important that the considerable development of knowledge and understanding about prehistoric landscapes as can be found exposed through the modern seabed, buried within contemporary marine sediments or that exist under the present seabed is given attention. For a demonstration of recent research activity please see the project page for Submerged Prehistoric Archaeology and Landscapes of the Continental Shelf (SPLASHCOS) at <https://splashcos.org/>. In reference to World Heritage Sites, please see our response to Question 1.

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

We appreciate that this approach is based on broad scale biogeographical regions within UK waters and we offer the comment that spatial determination of Historic Seascape Character (England only) could perhaps inform the ‘regional seas’ approach used in this SEA exercise. For Regional Sea 2 (5.4.2) we noticed that mention is not made to the importance for research presented within the southern North Sea to reveal evidence of considerable climatic change of the past 1.5 million years; this information is directly relevant to the development of policy and the action being taken today to address threats presented by climate change and challenges faced by society (as described in this Scoping Report, subsection 5.6.1.9). The description afforded to Regional Sea 3 (5.4.3) does not reference cultural heritage. Attention should also be given here to both prehistoric archaeological potential as demonstrated by the marine aggregate dredging concessions which specifically target prehistoric river systems. Furthermore, attention could also be given to the historic legacy of maritime activity, trade and conflict including aviation archaeological resources which are particularly common in this regional sea. For Regional Sea 4 and 5 (5.4.4) we add that attention could also be given to the presence of maritime historic losses, such as associated with catastrophic storm events and periods of worldwide conflict. For example, the shipping losses in the Western Approaches during the First World War are now automatically considered as underwater cultural heritage in line with 2001 UNESCO convention (as referenced above).



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4. *Are there any additional environmental problems you consider to be relevant to the SEA?*

We appreciate the attention given to possible disturbance of submerged cultural heritage (5.5.12) and it is relevant that attention should be given to the considerable volume of archaeological work associated with development-led studies, which now encompasses studies produced from offshore renewable energy projects along with ongoing work with the marine aggregates industry. In subsection 5.5.12.1, attention should also be given to published research frameworks e.g. the North Sea Prehistory Research and Management Framework (https://historicengland.org.uk/images-books/publications/ns-prehistory-research-manage-framework/10278_north_sea_prehistory_web/). In reference to “international and national protection measures and planning policy.” It is important to qualify this to include the application of mitigation measures as secured by consents and licensing requirements in alignment with planning policy. We would also like to see how the SEA exercise “should raise awareness” over and above an assessment that also determines risk and the manageability of change.

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

It is relevant to consider, in reference to 5.6.1.10, perceptions of change in character which are not explicitly linked with visibility. We also concur with the statement made in subsection 5.6.1.16 (cultural heritage) and add that it is important to differentiate between historic or archaeological seabed sites (e.g. the legacy of maritime activity associated with 20th century) e.g. chartered wreck recorded by UK Hydrographic Office from presently unknown elements of our shared historic environment which might be of considerable age, highly fragmentary and entirely, partially buried or periodically exposed.

6. *Are there any additional alternatives that you feel the SEA should reflect?*
No comment offered.

7. *Are there any objectives that you feel should be included or removed?*
No comment offered.

8. *Are the indicators for each objective suitable? If not please suggest alternatives.*
For landscape and seascape, we suggest that a means of guiding assessment of this objective is to consider not only factors that may “adversely affect the character of the landscape/seascape” but also the capacity of identifiable character to accommodate anticipated changes. In this regard, equal consideration of matters other than visual is key. It is also our advice in reference to cultural heritage that in addition to a quantified approach based on “Number of archaeological finds reported through best practice as a result of plan activities”, should also include how areas of archaeological potential are recognised, for example as demonstrated by geo-archaeological studies that could reveal substantial new information.



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

We concur with impacts identified under Landscape/Seascape and Cultural heritage (table 6.2) in terms of potential effects of development across the full range of energy industries listed. We also note the attention given to how the SEA exercise provides a "...high-level appraisal of the relative constraint on the UK's ambitions for decarbonisation from offshore wind"; we suggest that wider consideration through SEA should also determine positive aspects of decarbonisation, for example in reference to associated data acquisition programmes that can change and expand our knowledge and understanding i.e. as referenced to the UK Marine Science Strategy 2010 – 2025 (<https://www.gov.uk/government/publications/uk-marine-science-strategy-2010-to-2025>)

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

Consideration should be given to outputs recorded through OASIS, an online reporting form enabling archaeological and heritage practitioners to provide information about their investigations to regional Historic Environment Records (HERs) and respective national heritage organisations (please see: <https://oasis.ac.uk/>). This system demonstrates the completion of studies, such as through development-led programmes to accepted professional standards. The inclusion of recorded outputs could contribute to monitoring programmes as described. Table 6.3 should recognise marine plan policy with specific reference to heritage assets that are not designated (viz. UK Marine Policy Statement, 2011, paragraph 2.6.6.5)

11. *Do you have any comments on the proposed approach to consultation?*

No comments offered and we appreciate that workshop events might have to be held virtually.

Yours sincerely,



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