

Response ID ANON-MMNT-EQSH-D

Submitted to Planning for new energy infrastructure: revised draft National Policy Statements
Submitted on 2023-05-25 15:11:26

About you

1 What is your name?

Name:
Rob Lennox

2 What is your email address?

Email:
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3 What is your organisation?

Organisation:
Chartered Institute for Archaeologists / Council for British Archaeology

4 We usually publish a summary of all responses, but sometimes we are asked to publish the individual responses too. Would you be happy for your response to be published in full?

Yes

5 How did you hear about this consultation?

How did you hear about this consultation?:
Email from elsewhere

Other (please specify):

Critical national priority for OFW

1 Do you agree with the glossary definition for CNP?

Yes

Please expand on your response here:

Yes. However, it is important to understand the processes for assessing alternative sites and designs of CNP infrastructure in choosing the best locations, and understanding the need to avoid, mitigate, or offset harms which may result from infrastructure.

2 Do you agree with the new guidance added to draft EN-1, draft EN-3 and draft EN-5 on the CNP for offshore wind, supporting onshore and offshore network infrastructure, and related network reinforcements?

Not Answered

Please expand on your response.:

2a Do you agree that this policy will support government ambitions to deploy up to 50GW of offshore wind by 2030, including up to 5GW of floating wind?

Not Answered

Please expand on your response:

2b Do you agree that this policy will support government objectives to streamline the offshore wind consenting process?

Not Answered

Please expand on your response:

If you have any related supporting evidence you would like to include in your response, please upload here (1 document only).

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Offshore Wind Environmental Improvement Package

3 Do you agree with the new text included in Section 2.8.103 of draft EN-3 relating to the Offshore Wind Environmental Standards?

Not Answered

Please expand on your response here:

4 Do you agree with additions made in relation to strategic compensation and seeking the views of the SNCBs and Defra Secretary of State in Section 2.8.282 of draft EN-3 relating to the Compensatory Measures?

Not Answered

Please expand on your response here:

If you have any related supporting evidence you would like to include in your response, please upload here (1 document only).

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Civil and Military Aviation and Defence Interests

5 Do you agree that Section 5.5 of draft EN-1 relating to Civil and Military Aviation and Defence Interests, provides a more balanced and up-to-date view on offshore wind impacts of radar, and represents the needs of different stakeholders accurately?

Not Answered

Please expand on your response here.:

If you have any related supporting evidence you would like to include in your response, please upload here (1 document only).

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Need for new electricity network infrastructure

6 Do you agree with new guidance added to Section 2.8 of draft EN-5 on the inclusion of strategic planning as a consideration to support the needs case for electricity network infrastructure?

Not Answered

Please expand on your response here.:

If you have any related supporting evidence you would like to include in your response, please upload here (1 document only).

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Other comments

7 Do you have any comments on any aspect of the draft energy NPSs or their associated documents not covered by the previous questions?

Please respond here.:

We wish to comment on the updates to the historic environment section (5.9). Overall, the section is very strong, and is improved from the previous version of the NPS. In particular, we wish to support, in the strongest terms, the inclusion of paragraph 5.9.12. This encouragement to applicants to consider positive design choices is helpful, and the specific encouragement to consider the 'development of archive capacity which could deliver public benefits' is extremely important. This is particularly beneficial because infrastructure projects which create archaeological archives need to be deposited, and at present many archive facilities do not have capacity to take on new archives. Infrastructure which contributed to the development of archive capacity could be considered to be contributing to the offsetting of harm to the historic environment by ensuring that archives generated from site are well managed and accessible, increasing the chances that archived material will be accessed, researched, or displayed for public benefit. We applaud the inclusion of this forward-looking provision.

We also strongly support the definition of 'environment' – set out in paragraph 4.2.6 – being understood as inclusive of both natural and historic elements, and we support the integrated approach to managing these overlapping interests in Environmental Statements and as part of Environmental Impact Assessment.

We welcome the references to the historic environment in other sections of the document (e.g. 5.6) which act as helpful cross-reference points which will direct users of the NPS to relevant specific sections. This is helpful because many non-specialists may otherwise overlook historic environment impacts or

opportunities.

If you have any related supporting evidence you would like to include in your response, please upload here (1 document only).

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