



Historic England

## **Regional Energy Strategic Plan policy framework consultation**

### **Historic England Response**

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 Culture, Media and Sport (DCMS). We champion and protect England's historic places, providing expert advice to local planning authorities, developers, owners and communities to help ensure our historic environment is properly understood, enjoyed and cared for.

The historic environment has a vital role to play in delivering government objectives, from securing economic growth, delivering homes, to protecting and enhancing the historic places that communities value. Conservation of the historic environment also has a vital role to play in delivering sustainable development and meeting net zero targets, from re-using existing historic buildings to adapting places to reduce climate change impacts.

Historic England recognises the need to achieve the UK's net zero ambitions and in the transition to a decarbonised energy system. Upgrading the transmission and distribution networks, for both electricity and gas, has the potential to impact on the historic environment, at a landscape, settlement and site based level. Early consideration of historic environment impacts can ensure that any potential impacts can be understood and, where necessary, avoided or minimised.

Historic England supports a strategic and integrated approach to decarbonise energy and to achieving net zero at the distribution level. The development of Regional Energy Strategic Plans (RESPs) as set out in this consultation appears to provide the National Energy System Operator (NESO) with an appropriate mechanism to do this. However, given the potential for distribution networks to impact upon the historic environment, we are keen to work with both Ofgem and NESO on the detailed development of RESPs, to ensure any impacts are minimised and/or appropriately mitigated.

We are encouraged to see the proposals emphasise the need for place-based engagement and local support. Table 3, paragraph 3.55 outlines four principles to guide place-based engagement. The Representative principle "Ensure broad involvement in the strategic plan from across the region, including from under-representative stakeholders" should include engagement with the appropriate historic environment stakeholders. We therefore recommend early engagement with



Historic England and local heritage specialists, such as local authority conservation staff and county archaeologists, when preparing RESPs.

It would be beneficial if other environmental impacts, such as those on the natural environment, could be considered in a holistic way when RESPs are being prepared. We would therefore recommend engagement with other statutory consultees, such as Natural England and the Environment Agency, as part of the process.

Although it is assumed that most of the distribution network would be terrestrially based, there may be an intersection with marine planning in estuarine and coastal areas, so engagement with the Marine Management Organisation should be considered.

Greater clarity is needed on the scope of RESPs, as paragraph 1.3 references distribution issues at a street based level and paragraph 3.38 states "There may be cases where it provides additional steers on local planning potential, such as identifying opportunities where heat pumps could be installed and opportunities for energy efficiency in buildings." This suggests that intention may be for RESPs to cover matters beyond the distribution of power at a strategic level. This has the potential to cause confusion, and potential conflict, with local planning matters (such as with local plans and policies) and RESPs, as strategic documents, would not appear to be the place to consider matters with potentially detailed, site-based impacts.

RESPs should also be informed by all available data and information relating to the historic environment, such as that contained in Historic Environment Records (HERs). In addition to details of all designated heritage assets, such as scheduled monuments and World Heritage Sites, HERs also include other information which will be of use; such as landscape and urban settlement characterisation and information relating to locally important heritage assets. Data relating to the historic environment should be included alongside those listed in table 2.

Going forward we would expect to be consulted by NESO as they develop the RESPs. Paragraph 4.7 suggests that "...working groups will be vital for gathering place-based views and data..". Assuming Strategic Boards have an appropriate balance of local democratic and network company representatives, as well as any wider cross-sector actors (paragraph 4.14), membership of the relevant working groups could be an ideal opportunity for us to provide early advice and guidance. This would enable Distribution Network Operator (DNOs) to be agile in their short- and longer-term planning, potentially saving them time and money. It further supports the approach outlined in paragraph 3.41 advising NESO to facilitate input and engagement from all relevant local actors.

We welcome the proposal (paragraph 3.17) for annual data refresh and a full RESP update every three years. Historic England would be pleased to feed into both. It may also be prudent to contact other statutory bodies at these intervals as well.



Historic England

With regard to the next steps outlined in Chapter 6 we recommend that Ofgem, and in future NESO, consult with Historic England both on further developments of this policy framework and on the development of the RESPs themselves. We look forward to working with Ofgem and NESO in the future.

*Historic England*

*Policy Department*

*8 October 2024*