



Historic England

Cheveon Badi,  
Senior Policy Advisor,  
Ports and Shipping,  
Maritime,  
Department for Transport

*Response by email only*

1<sup>st</sup> March 2024

Dear Cheveon,

**Department for Transport Revised National Policy Statement for Ports  
Appraisal of Sustainability (AoS) Draft Scoping Report**

Further to the email and the attached NPS for Ports AoS Scoping Consultation document, received on 23<sup>rd</sup> January 2024, from Alastair Peattie (Technical Director, Assessment and Appraisal, WSP), we hereby offer the following response.

As you might be aware, the Historic Buildings and Monuments Commission for England (HBMCE), known as Historic England, is the Government's adviser on all aspects of the historic environment in England including historic buildings and areas, archaeology and historic landscape with a duty to promote public understanding and enjoyment. Historic England is an executive Non-Departmental Public body sponsored by the Department for Digital, Culture, Media and Sport and we answer to Parliament through the Secretary of State for Digital, Culture, Media and Sport.

Historic England's general powers under section 33 of the National Heritage Act 1983 were extended (via 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. We also provide our advice in reference to National Policy Statements and the objectives and policies of published Marine Plans for the English Inshore and Offshore areas, as defined by the Marine and Coastal Access Act 2009.



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We are aware from the Section 5 of the Scoping Report that you are seeking responses to the following questions:

1. *“Do you agree with the key issues identified within the topic areas? If not, what issues should be removed from the scope of the appraisal and which relevant issues should be included in the proposed scope of the appraisal?”*

We agree with the key issues identified and the inclusion of the historic environment i.e. Cultural Heritage, including architectural and archaeological heritage (as included in Tables 3-1 and 3-2). We also take this opportunity to highlight inclusion of the risk that port development projects could encounter presently unknown elements of the historic environment which could be of significant archaeological interest vis. heritage assets as defined by national policy.

2. *“Do you think the AoS Scoping Report sets out sufficient information to establish the context for the appraisal? If not, which areas do you think have been missed and where is information on these topics available from?”*

Sufficient information has been provided in this scoping report. However, we note the attention given to the UK Government *25 Year Environment Improvement Plan* and indicator G2 (Natural Beauty, Heritage & Engagement): “Condition of heritage features including designated geological sites and scheduled monuments”. We therefore highlight the attention given to other elements of the historic environment in Table 4-1 (11. Cultural heritage), which includes consideration of non-designated heritage assets and historic buildings, places or spaces that contribute to local distinctiveness, character and appearances. Any subsequent AoS Report will need to given equal attention to these aspects in addition to the specific attention stated by Indicator G2 and nationally designated sites, places and areas.

3. *“Do you agree that the AoS objectives and guide questions cover the breadth of issues appropriate for appraising the effects of the draft revised NPS? If not, which objectives should be amended and which other objectives do you believe should be included?”*

We do not specifically identify objectives for amendment, but we recommend that referral, as relevant, is made to how the onshore and offshore historic environment is included within the energy related National Policy Statements (e.g. EN-1 and EN-3), published in November 2023, to support a consistent approach to consideration of the historic environment.

Yours sincerely,



**Dr Christopher Pater**  
**Head of Marine Planning**

Cc Antony Firth (Head of Marine & Coastal Heritage, Historic England)  
Luke Wormald (Head of East Region and Infrastructure, Historic England)



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