

Offshore Energy Transition and Coal Legacy Division
Department for Energy Security and Net Zero
6th Floor
3-8 Whitehall Place
London SW1A 3EG

30th April 2025

Dear Sir/Madam,

Building the North Sea's Energy Future

Consultation response

This is the corporate response by the Historic Buildings and Monuments Commission for England (Historic England), which is a statutory consultee in relation to the historic environment, the lead body for the heritage sector and the Government's principal adviser on the historic environment in England.

We appreciate the overarching objective set out in *Building the North Sea's Energy Future* is '...to foster an internationally-leading offshore clean energy industry, which ensures good, long-term jobs, growth and investment in communities across the North Sea, in tandem with a sustainable transition in oil and gas...'. Furthermore, we understand the focus on managing the legacy of oil and gas production in the North Sea including decommissioning of infrastructure and environmental restoration, but also the possibility of strategic integrated energy 'hubs' that could combine different technologies such as Carbon Capture, Usage and Storage (CCUS), solar, hydrogen and offshore wind.

We would like to acknowledge the importance of North Sea oil and gas to the twentieth and twenty-first century history of the UK in the southern North Sea off England as well as off Scotland. Oil and gas is an important part of our story nationally, but also to the communities whose lives have been bound up with its many facets. Although people might not immediately identify oil and gas infrastructure as 'heritage', other comparable sectors are now firmly regarded as industrial heritage and have become a major focus of public attention and activity.

The treatment of recent industries as heritage presents practical challenges, but Historic England has important experience to apply to North Sea oil and gas that could assist in the process of transition. Information about relevant aspects of Historic England's role can be found via the following links: [Understanding Industrial and Infrastructure Heritage](#); [Twentieth Century Industry](#). As a further example, Historic England has published an Introduction to

Heritage Assets on [20th-Century Coal- and Oil-Fired Electric Power Generation](#). We recently carried out a photographic survey of the Brent Charlie platform during decommissioning at Able Seaton Port (Hartlepool) for inclusion within the Historic England national photographic archive: [Archive Search Results | Historic England](#).

The approach being taken by the Nuclear Decommissioning Authority (NDA) to the heritage of the nuclear sector may also be instructive: the NDA launched its heritage vision and strategy last year: [NDA publishes first ever nuclear heritage strategy - GOV.UK](#); [Heritage vision and strategy - GOV.UK](#). In its current [Business Plan](#), NDA notes 'There are many benefits of preserving, safeguarding, and celebrating nuclear heritage, ranging from learning lessons of the past so we can support decommissioning and future nuclear developments, to realising significant social value potential by connecting with local communities and stakeholders'.

As you may be aware, the importance of the heritage of North Sea oil and gas is already a focus of attention in Norway ([Norsk Oljemuseum](#)); and National Museums Scotland ([Collecting contemporary energy](#)).

In recognition of our role and responsibilities for the sustainable management of the historic environment, we have focused the remainder of this response on those questions where we are best placed to offer advice.

Question 1b – *In addition to the investments in clean energy industries outlined in this section, are there any other areas you think should be targeted for investment?*

Response – We note the reference to creative industries among the additional high-growth sectors that may be relevant to oil and gas workers during transition. The creative industries encompass heritage: heritage has a high economic value in itself (Gross Value Added of £44.9 billion in 2022: [The Economic Value of the Heritage Sector | Heritage Counts](#)). Heritage also contributes significantly to other facets of creativity (see [Cultural Heritage, Creativity and the Creative Economy | Heritage Counts](#); also [Heritage Creates 2025](#)). National Museums Scotland has started to explore the links between oil and gas, heritage and creativity (see [Age of Oil: Final farewell to Brent Delta platform](#)). Undoubtedly, this would be a productive avenue to pursue more widely, potentially having significant economic and social benefits and contributing to wider public engagement with the future of energy in the North Sea.

Question 1d – *Which locations offer the best opportunities for investment in clean energy industries?*

Response – We recommend that determining locations for investment involves coordination with Local Planning Authorities (LPAs). The focus should be on working collaboratively to identify site allocations: ongoing close working between LPAs and with energy industries will assist in ensuring appropriate and proportionate assessment of locations. Historic England can support that discussion and help identify positive outcomes for investment. In doing so the focus should be to make sure that selected locations meet the aspirations of growth and deliver sustainable development and its economic, social and environmental objectives.

Question 2 – *What, if any, additional measures could help the oil and gas workforce to transition into a) clean energy and b) other industrial strategy sectors?*

Response - In sections 3.2.1 (Skills and transferability of the oil and gas workforce) and 3.2.2 (Availability of clean energy jobs), the inclusion within Figure 6 of 'heat and buildings' and Figure 8 of 'energy efficiency and retrofit' should be considered inclusive of energy efficiency in heritage assets (buildings) and the skills needed to create jobs and new business opportunities, as part of a low carbon and renewable energy economy. We therefore take this opportunity to refer to our published guidance: [Adapting Historic Buildings for Energy and Carbon Efficiency](#) and our other online information:

- [Investing in Heritage to Avoid Embodied Carbon Emissions | Heritage Counts](#); and
- [Save Energy and Reduce Carbon Footprint in an Old House](#)

Question 4b – *What can we do to further support specific local communities that are heavily reliant on oil and gas through the transition?*

Response - Engaging with the heritage of oil and gas could be a powerful means of supporting communities during transition. Actively engaging with the heritage of North Sea oil and gas would be an effective means of delivering broader aspirations to recognise the proud history of our offshore industry and the brilliance of its workforce. Greater public understanding of the challenges and achievements of oil and gas could also help communicate the foundation it provides for jobs and skills in other sectors, including offshore clean energy. Further, engaging with the history of oil and gas will support public appreciation of change and the choices that have been faced and continue to be faced regarding energy in the North Sea: on climate, environment, security, innovation, technology, engineering, employment and so on. As an example of the potential role of heritage in informing public discussion, Historic England is a

partner on the Defra/UKRI funded research project [TRANSECTS Coastal Communities and Energy Transitions](#).

Question 7g – *Where do you see the main opportunities in a) offshore wind b) floating offshore wind, c) CCUS (T&S) d) hydrogen e) decommissioning for the oil and gas supply chain?*

Response – When considering opportunities, a key aspect will be locations and known or potential clusters that could also benefit the historic environment by encouraging investment within industrial areas that already have a rich legacy of enterprise and development. To deliver such benefits effectively will require the active participation of LPAs as a key partner in regeneration initiatives. Incentivisation would help to maximise the use of existing locations which have already been assessed to support the sharing of infrastructure; a circular economy approach is preferable from a net zero perspective and should also cause less disturbance and provide better long-term maintenance opportunities. For an example of investment that links heritage-led regeneration in Grimsby Docks with new renewable energy developments, please see [Green Energy – The Kasbah Grimsby](#).

Question 8 – *How can we improve our understanding of the interconnected basin, including its opportunities and risks? Do you have any evidence you can share about this?*

Response – Section 3.6 sets out the ‘...ambition to make the North Sea the green power plant of Europe’. However, while the honesty of this ambition is laudable it is equally important to recognise the diverse and complex environment, social and other economic investment in our shared use of the North Sea, or any part of the marine environment around the UK. We therefore recommend that more attention is given to an overall, more holistic interpretation of marine planning and securing the engagement of other marine stakeholders in all aspects of the decision-making process.

Question 13a – *Which of the following options for revising the principal objectives, if any, do you prefer?*

Question 13b – *Please share your rationale for your answer to question 13a.*

Response – Historic England is more concerned about the scope, content and implementation of NSTA’s objective(s) than with the route that is taken (single objective; sub-objectives; multiple objectives). We welcome the prospect of NSTA playing an updated stewardship role in a transition that is phased, responsible and prosperous with express reference to benefits to communities. We would strongly welcome a clear commitment that NSTA will have regard to

cultural heritage in the course of its stewardship so that the benefits of engaging with oil and gas heritage as highlighted in this response become embedded in practice.

Question 14a – *What are your views on the ideas for reforms to the NSTA's powers considered above?*

Response – Heritage could make an important contribution to decommissioning (Section 4.2.3.1) in at least two respects. First, in the application of heritage skills in collating and applying historical information to understanding the infrastructure to be decommissioned. This includes securing and mobilising documentary information – documents, drawings, photographs etc. – held by the sector (see [NDA Archives](#) for the approach taken towards archives in nuclear decommissioning). It also includes integration with high resolution survey information from underwater and topside, as demonstrated by photographic recording of Brent Charlie courtesy of Able Seaton Port. Importantly, using heritage approaches to inform decommissioning will achieve both a record of the structures being removed and inform the removal of those structures, helping with de-risking. Second, heritage can contribute to understanding the environmental and economic consequences of leaving structural elements on the seabed post-decommissioning. There are numerous heritage structures in the marine environment – ranging from historic piers to shipwrecks – providing topographies and substrates that host important habitats and give rise to various ecosystem services. As the age of heritage structures is often known, the characteristics of their associated habitats provide insight into future outcomes for more recent oil and gas infrastructure. Historic England hopes to bring these perspectives to the forthcoming major UKRI/INSITE research project on the [Value of Marine Artificial Structures \(ValMAS\)](#).

We would welcome the opportunity to assist in the production of a plan for the North Sea, as described in the 'Next Steps' section of the consultation document. We look forward to working with government and other stakeholders to realise your determination to work with North Sea communities and thereby ensure they have a prosperous and positive future.

Yours faithfully

Dr Antony Firth

Head of Marine and Coastal Heritage