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The Heritage Dimension of Commercial Renewable Energy Development in Planning

November 2025

Executive Summary

1. The report provides a high-level analysis of how the historic environment is considered in renewable energy planning applications in England, through planning applications submitted between July 2019 and June 2024. Commissioned by Historic England and conducted by drp archaeology as part of Historic England's response to growing climate change prioritisation as a result of Government policy toward achieving net zero by 2050 and clean power by 2030.[1] It examines 500 selected planning applications from the DESNZ REPD, of which the criteria is detailed in the Methods section of this report, offering fresh insights into the evolving relationship between climate action, planning reform, and heritage protection.

2. The analysis and subsequent authorship of this report, *The Heritage Dimension of Commercial Renewable Energy Development in Planning 2025,* is based on the Department for Energy and Net Zero (DESNZ) Renewable Energy Planning Database (REPD), available via the gov.uk website.[2] The REPD is managed by Barbour ABI on behalf of DESNZ to track the progress of renewable electricity projects, and electricity storage projects from inception, through planning, construction, operation and decommissioning. The REPD is updated on a quarterly basis, and contains information on all Renewable Electricity and Combined Heat and Power projects up to the end of the previous calendar month. The REPD accessed for this report was done in January 2025.

3. In this report, comparisons are made between an earlier report analysis of the same DESNZ REPD published in January 2021, which analysed the DESNZ REPD from July 2015 to December 2019. Comparing the 2021 publication with this report (2024), commercial renewable energy planning applications surged by 188%, rising from 5,946 to 17,135 application entries within from the DESNZ REPD. After applying technology and location filters, the study systematically analysed 500 applications (from both the Town and Country Planning Act (TCPA) and Nationally Significant Infrastructure Project (NSIP) routes), of wind, solar, biomass, and energy-from-waste (EfW) projects in England only.

4. Despite a strong national policy framework requiring protection of the historic environment under the National Planning Policy Framework (NPPF) and relevant historic environment considerations within National Policy Statements, application practice can be uneven across England. The report highlights that while heritage assessments such as Desk-Based Assessments (DBAs) and geophysical surveys are now more common on these types of projects, inconsistencies persist in the depth of heritage analysis required, levels of engagement between applicants and heritage advisers, and negotiation over mitigation.

5. It is important to take care with the significance of observed difference statistically between the study conducted in 2021 with that presented here, even if this maybe marginal. There will be a standard error through using finite sample sizes (458 in the 2021 study, 500 in this study), in addition to comparison between different sample sizes. Please take this into account when reviewing the comparisons made in this study.

6. Findings show that heritage considerations have become more common but remain inconsistently integrated within the process, resulting in uncertainty for applicants with regard to a consistent heritage approach for heritage assets and a standardised set of requirements.

1 Clean Power 2030 Clean Power 2030: Action Plan: A new era of clean electricity . UK Government is currently consulting on reviews of EN-1 (overarching energy NPS, EN-3 (renewables NPS) and EN-5 (electricity networks NPS) to include reference to Clean Power 2030.

2 https://www.gov.uk/government/publications/renewable-energy-planning-database-monthly-extract#full-publication-update-history

In the 2019–2024 period, 73% of applications considered heritage as part of their application proposal - an 11% rise compared to the 2014–2019 survey. 61% of those engaged with designated heritage assets and 60% considered non-designated heritage assets. 35% of final decision notices explicitly referenced heritage within their determinations.

7. Within the DESNZ database for renewable energy development, applications were dominated by solar energy projects (89.0%), with biomass (4.6%) and on/offshore wind energy (4.0%) making up smaller proportions. Solar projects, in particular, highlighted the tensions between wider landscape setting impacts and renewable energy benefits.

8. Key procedural findings include:
   - Approval Rates: 68% of applications were approved and refusals were at 11%. The remaining include applications that may still be under consideration.
   - Pre-Application Advice: 59% of applications involved pre-application advice, indicating a lack of early heritage input for at least 37% (the remaining 3% unknown).
   - Consultation and Decision Timelines: Only 29% of TCPA applications were decided within the standard timeframe; 59% were outside of statutory consultation periods. The remaining 12% is unknown. Of the NSIPs in which a decision has been made, none were within the statutory timeframe.
   - Conditions for conservation: of the 500 applications where heritage is a condition in the Decision Notice (n=143), 57% out of 143 applications included mitigation by record (excavation) in line with Paragraph 218 of the NPPF 2024; 7% out of 143 applications included Preservation in Situ; 29% out of 143 applications included both (the remaining 7% unknown).

9. The study identifies critical challenges, including the under-resourcing of Local Planning Authorities (LPAs) and varied levels of engagement (e.g., substantive responses, 'no comment' responses and referral responses) across regions from heritage-related statutory consultees (see Appendix 1) including Historic England. This study did not assess whether Historic England had a statutory requirement to engage.

10. Regional variation was notable, although it is essential to note subsequent percentages are based on total applications submitted *to specific regions* that vary (please refer back to Point 4). Comparisons, thus, critically warrant both caution and further investigation. The South West received the most applications (n=91) followed by the Eastern region (n=89) with the highest percentage of 70+% approval rating based on their total applications. The North East and North West had lower application totals (n=26 and n=31 respectively) with the North West, from those 31 applications, having an acceptance rate of 61% and relatively high refusal rate of 16% (remaining 23% across various planning status). These statistics need further investigation.

11. This study differentiates advisers that have submitted an objection on a planning application, which is *considered* but not binding as part of planning decisions, and recommendations for refusal, which carry significant weight and can be legally decisive. Importantly, *objections* from heritage advisers occurred in just 5.2% of all 500 applications. *Refusals* based on heritage considerations were recommended in 4.8% of total applications. Heritage was the primary reason for refusal in 0.8% (n=4) of all 500 applications, and part of a wider set of rationale in 3.8% (n=19) of all applications. This suggests that while heritage concerns are raised, across applications they rarely feature as a primary reason for refusal, and included rationale for refusing development.

12. The study highlights key tensions within the planning process: the trade-off between expediency and robust and necessary heritage assessment; the framing of heritage advice as a "blocker" rather than a legally required planning safeguard; and the variability in heritage adviser

involvement in the application process. Early engagement (e.g., through pre-application advice) is highlighted by heritage advisers as a valued stage of the planning process to identify heritage assets under consideration and help recommend mitigation. However, it should not be understood as a guarantor of planning success, a view often carried by applicants.

13. Furthermore, the study emphasises the importance of integrating historic environment considerations holistically within climate and spatial planning objectives, rather than treating them as obstacles to renewable energy development.

14. Regarding TCPA applications which constitute the majority of the 500 applications analysed, recommendations are directed at strengthening early-stage dialogue, better resourcing for LPAs and both statutory and non-statutory consultees, embedding heritage-led design principles into renewable infrastructure, and clarifying policy guidance between national policies (e.g., NPPF) and local policies (e.g., Local Plans) to reinforce heritage protection as a public benefit within renewable energy development plans.

15. This work calls for a more transparent, collaborative, and integrated planning process that balances the UK's urgent climate goals with its responsibility to safeguard the historic environment for future generations. It recommends this could be achieved through the exploration for further integration of renewable energy development across competing land use interests, such as agriculture, housing, infrastructure and nature recovery via integrated land use planning strategies. Forthcoming Local Government reorganisation and proposed strategic authorities under the English Devolution White Paper 2024 may assist with this approach as Local Plans become superseded.

Key Take Aways - Facts & Figures of the 500 applications:

- 188% increase in renewable applications since the 2021 Report analysing the REPD from July 2015 to December 2019, indicating a huge growth and demand from this sector.
- Of the 17,135 entries in the REPD (July 2019 to June 2024) across the UK, Biomass, EfW Incineration, Solar Photovoltaics, Offshore and Onshore technology types made up 50.91%. 32.8% of those are for solar photovoltaics.
- In England, 39.9% of all solar photovoltaic applications are located on roofs rather than on the ground, ground & roof, or floating.
- Of the 500 applications, 93% of applications went through TCPA planning, not NSIP.
- In comparing results from the 2021 Report and this Report, there was a 7% increase in granted applications and a 6% decrease on refused applications.
- In comparing results from the 2021 Report and this Report, there was an 11% increase of heritage as a consideration in the application process.
- Of the 500 applications assessed, 29% of decisions were made within statutory timeframes, 58.6% outside of the timeframes. The remaining is NA.
- Of the 500 applications assessed, only 4.8% had a recommendation for refusal put forth by a heritage adviser.
- Of the 500 applications assessed, only 5.2% had objections submitted by a heritage adviser and/or consultee.[3]
- Of the 57 refused applications, only 5.26% (n=3) of Decision Notices had direct impact to archaeology as the rationale; 35.09% (n=20) were related to setting; and 1.75% (n=1) to both setting and direct impact. Note the sample size is 57: 57.89% of refusal rationale could not be determined.
- Of the 500 applications analysed, there are geographical concentrations of particular renewable energy types, with solar photovoltaics[4] concentrated in the south, and wind on/offshore concentrated in the north, despite no formal spatial strategy for this.
- There is an observed gap of the assessment of heritage risk between the applicant and heritage adviser, with the former generally assessing lower risk than the latter.

Quick Reflections:

- The sizeable increase in planning applications observed in the REPDs analysed for the 2021 Report and this Report is significant and is putting pressure on LPA resources, already under strain (e.g., reductions since 2006 for local authority archaeology staff is 33%; local authority planning staff, 25%).
- The increased approval rates and reduced refusal rates of decisions of Renewable Energy applications may suggest pressure to approve applications due to national priorities, or improved historic environment assessments and pragmatic approaches adopted by commercial consultants and LPA heritage teams.
- Planning processes outside of statutory consultation timescales highlight the complexity of renewable energy developments, the quality of assessments, resource capacity, questions regarding standardisation, and the need for case-by-case, negotiative approaches to planning.
- Issues of setting remains a challenge with regard to renewable energy planning developments.
- Early engagement with heritage advisers offers valuable opportunities to ensure heritage is addressed appropriately, yet remains underused as part of the planning process.

[3] Note this report highlights a different between 'submitting an objection' and 'recommending refusal'. See No. 11 of the Executive Summary above.

[4] Note this does not include solarvoltaic roofs. Only ground, ground and roofing and floating.

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Figures and Tables

1 Note on the development of this Report

This Report has been prepared by drp archaeology as part of the Historic England series to understand the heritage dimension of commercial renewable energy development in planning, and evaluate the effectiveness of heritage consideration within planning and pre-application processes.

The aim of this report is to enhance understanding of the role and impact of Historic Environment Assessments and advice across commercial renewable energy planning applications.

This document sets out the findings of the sample derived from the Department for Energy Security and Net Zero (DESNZ) Renewable Energy Planning Database conducted by drp archaeology.

drp archaeology is a dynamic small heritage and archaeology consultancy, dedicated to fostering meaningful connections within local communities while delivering exceptional value to the public. We pride ourselves on prioritising close and meaningful relationships with our clients and stakeholders, ensuring that every interaction is personalised and impactful. Our mission goes beyond profit margins; we believe in actively contributing to the well-being and prosperity of the neighbourhoods we serve through the various benefits and contributions offered by heritage and the historic environment. In prioritising local engagement and public value, we are not just a company but a vital part of the community fabric.

This drp archaeology report and its associated database and analysis are independent outputs and do not represent the views, policies, or positions of Historic England.

Any interpretations, conclusions, or recommendations contained within the report remain those of the authors alone.

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Credit Roles

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Data Images– Hana Morel

2 Quick Reference Table

IDENTIFIERS			
Project Name	The Heritage Dimension of Commercial Renewable Energy Development in Planning Research Project		
Data Source	DESNZ Renewable Energy Planning Database (January 2025)		
Authors	Hana Morel, Daniel Phillips, Peri Horsley		
Selection Range	2019-2024	**Total No. Entries after filters**	500

HERITAGE IDENTIFICATION					
% of Application Considering Heritage	**73%**	**Heritage Identified by**	**Applicant**	**LPA Team**	**Historic England**
		App No.	**34%**	**33%**	**0.40%**

HERITAGE IMPACT								
Type of Assessments (%) (*these may overlap*)				**Heritage Impact**	**Negligible-Low**	**Low**	**Moderate**	**High**
DBA	Heritage Statement	Geophysics Survey	EIA	**Consultant**	**16%**	**20%**	**3%**	**1%**
51%	**21%**	**38%**	**19%**	**LPA Heritage Team**	**11%**	**20%**	**17%**	**8%**

Heritage Asset Considered (%)			Nature of Impact Assessed (%)		
Designated	**Non-Designated**	**Both Considered**	**Direct**	**Setting**	**Both Considered**
61%	**61%**	**56%**	**11%**	**11%**	**40%**

CONSULTATION			
Known Responses from LPA Heritage Team/Historic England		**Heritage Put Forward as Objection or Recommended for Refusal**	
LPA Team	Historic England	Heritage as Objection	Heritage as Refusal
64%	**28%**	**5%**	**5%**

Application w/ Designated Assets	**Listed Building**	**Scheduled Monument**	**Conservation Area**	**RPG**	**Registered Battlefield**	**WHS**
App No.	**57%**	**28%**	**25%**	**10%**	**1%**	**1%**

DECISION			
Application Status		**Heritage in Decision**	
Approved	Refused	Included	Excluded
68%	**11%**	**35%**	**41%**

3 Introduction

3.1 Historic England Brief for Assessment and Research Parameters

3.1.1 This report presents the findings of a research project in which drp archaeology was commissioned by Historic England to review 500 applications only from the UK Department of Energy Security and Net Zero (DESNZ) Renewable Energy Planning Database (July 2019-June 2024) with regard to heritage implications.

3.1.2 The aim of this series of research is to enhance Historic England's understanding of the consideration of heritage within planning for renewable energy development, through a high-level analysis of planning applications.

3.1.3 This report continues from the drp archaeology 2021 Report '*Heritage Dimension of Planning Applications*' in which 458 applications dating from July 2015 to December 2019 were analysed.

3.1.4 drp archaeology has adopted the definition of 'heritage dimension' defined as: where a heritage asset, designated or non-designated, has been considered – whether that is raised, identified, assessed and/or mitigated as part of the application.

3.1.5 Without filtration, the DESNZ Renewable Energy Planning Database revealed the following insights:

- Total entries between July 2019-June 2024 were 17,135.
- Of those, Biomass, EfW Incineration, Solar Photovoltaics, Offshore and Onshore technology types made up 50.91%.[5]
    - Biomass (co-firing) = 5 (0.03%)
    - Biomass (dedicated) = 281 (1.64%)
    - EfW Incineration = 214 (1.25%)
    - Solar Photovoltaics = 5614 (32.76%)
    - Offshore = 95 (0.55%)
    - Onshore = 2515 (14.68%)
- 8,050 (47%) of the 17,135 total entries were based in England.

3.1.6 500 applications for renewable energy planning applications over the period of July 2019 to June 2024 in England were selected using the following filters.

- **Technology type:** on- and offshore wind, solar photovoltaics[6], biomass and energy from waste (EfW).
- **Country:** England only and offshore
- **Timeline:** July 2019-June 2024

3.1.7 More information about the Methods and Methodology can be found in Appendix 2.

[5] Other technology types available via the DESNZ database, but not interrogated in this study, include: advanced conversion technologies, air source heat pumps, anaerobic digestion, battery, compressed air energy storage, flywheels, hydrogen fuel cells, gas boiler, geothermal, hot dry rocks, hydrogen, landfill gas, large hydro, liquid air energy storage, pumped storage hydroelectricity, sewage sludge digestion, shoreline wave, small hydro, tidal lagoon, tidal stream, and unknown.

[6] Because solar panels of building roofs made up 38.9% of solar applications in England, the decision was taken to remove this technology type from the analysis, as the majority of applications were PDO/PDR and did not require heritage consideration. Therefore, this research only looks at solar farms, which makes up 47.8% of solar applications. See Appendix 2 on Methods and Methodologies for more information.

3.2 The UK Planning Framework and Renewable Energy Policy

3.2.1 The overarching frameworks guiding renewable energy development in the UK is established by the *Town and Country Planning Act 1990*; and the *Planning Act 2008*, which sets out procedures for *Nationally Significant Infrastructure Projects* (NSIPs), including large-scale renewable energy projects such as offshore wind farms.

3.2.2 NSIPs are assessed under the Planning Inspectorate (PINs) and the *National Policy Statements* (NPSs), specifically *EN-1* (Overarching Energy) (2023) and technology-specific statements like *EN-3* (Renewable Energy Infrastructure) (2023). EN-1 recognises the government's commitment to transitioning to a low-carbon economy and emphasises the urgent need for new renewable infrastructure. It also explicitly requires decision-makers to consider impacts on the historic environment, including archaeological sites and historic landscapes, under Section 5.8 of EN-1, which aligns with the *National Planning Policy Framework (2025)* in England.

3.2.3 The NPPF provides the main policy context for development decisions in England. It requires that planning policies and decisions ensure that new developments are sustainable and take account of the historic environment. Chapter 16 of the NPPF mandates that heritage assets, whether designated or not, be conserved in a manner appropriate to their significance. Harm to such assets requires a clear and convincing justification, and public benefits weighed against this harm. The NPPF also guides Local Planning Authorities (LPAs) in preparing Local Plans that address climate change mitigation and the conservation of the historic environment.

3.2.4 For offshore and marine renewable developments, the *Marine and Coastal Access Act 2009* is the key piece of legislation. It introduced a marine planning system and established the *Marine Management Organisation (MMO)*, which oversees licensing of marine activities in English waters. Marine Plans, produced under this Act, must conform to the UK's *Marine Policy Statement* (MPS. 2011), which recognises the need to conserve the historic environment and marine heritage. The MPS states that development should include consideration of heritage assets and that opportunities should be taken to contribute to our knowledge and understanding of our past.

3.2.5 All major renewable developments are subject to Environmental Impact Assessment (EIA) under the *Infrastructure Planning (Environmental Impact Assessment) Regulations 2017* (for NSIPs) or the *Town and Country Planning (EIA) Regulations 2017* (for smaller-scale developments; referred in our application analysis as TCPA).

3.2.6 These regulations require an assessment of likely significant environmental effects, including on cultural heritage. Archaeological concerns are addressed under the "cultural heritage" heading, which covers both designated and non-designated heritage assets. Where non-designated heritage assets are concerned this includes both known and potential (buried or submerged) assets. If impacts are likely, then an assessment of significance must be undertaken. The NPPF sets out two levels of harm (paragraphs 214-215) for designated heritage assets categorised as *substantial harm* or *less than substantial harm*. Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply. For less than substantial harm then that harm should be weighed against the public benefit derived by the proposal. For non-designated heritage assets (paragraph 216) a planning balance must be undertaken weighing up the assets level of significance against

the scale of any harm or loss. Regardless of type of heritage asset, where development consent will lead to a loss of significance then measures must be put in place to secure its 'record and advance understanding' (NPPF, paragraph 218).

3.2.7 It is a requirement of the *Town and Country Planning (Environmental Impact Assessment) Regulations 2017* an LPA adopt a screening opinion within three weeks. Statutory consultees (e.g., Historic England) are not legally required to respond to an EIA screening request. This means that LPA officers are potentially left to make decisions without full information.

3.2.8 Scoping is not mandatory, but where a scoping opinion is requested, it must, as a minimum, include the information set out in Part 4, Regulation 15(2) of the EIA Regulations 2017. The LPA has five weeks within which to provide a scoping opinion (Part 4, Regulation 15 (4)) and cannot adopt a scoping opinion until it has consulted the 'consultation bodies', which includes Historic England. In turn, consultees are required to declare if they have any relevant environmental information to assist with the preparation of an EIA Report and, if so, provide said information (Part 4, Reg. 17(4)).

3.2.9 Guidance for the offshore renewable energy sector has been developed by organisations like COWRIE (Collaborative Offshore Wind Research into the Environment) and The Crown Estate. The *Protocol for Archaeological Discoveries (PAD)*, developed by Wessex Archaeology and endorsed by The Crown Estate, provides a mechanism for reporting unexpected archaeological finds during construction. This is crucial given the high level of risk associated with submerged and intertidal archaeology. The PAD complements pre-consent archaeological assessments and supports compliance with legislative requirements such as the *Protection of Wrecks Act 1973* and *Merchant Shipping Act 1995*.

3.3 Legal Protection for Heritage Assets Relevant to Renewable Energy Development

3.3.1 The UK is a party to several international agreements that influence how heritage is treated during renewable energy development, such as the 1972 *Convention Concerning the Protection of the World Cultural and Natural Heritage* (known as the *World Heritage Convention*). The *Valletta Convention* (European Convention on the Protection of the Archaeological Heritage, 1992) obliges signatories to integrate archaeological heritage protection into planning processes, including developer-funded assessment and mitigation. The UK is also bound by the *UNESCO Convention on the Protection of the Underwater Cultural Heritage* (2001) in a non-ratified capacity; though not a full signatory, the UK has agreed in principle to its aims. These conventions reinforce the need to ensure that renewable energy development does not come at the expense of archaeological integrity, especially in offshore zones where heritage is less visible but highly vulnerable.

3.3.2 The UK has a robust legal and policy framework for the protection of the historic environment, encompassing designated and non-designated heritage assets on land, in intertidal zones, and offshore. For developers in the renewable energy sector, including offshore wind and solar energy, a comprehensive understanding of this framework is critical to ensure lawful compliance, appropriate assessment and mitigation, and the long-term conservation of heritage assets.

3.3.3 The *Ancient Monuments and Archaeological Areas Act 1979* remains the principal legislation protecting nationally important archaeological sites in the UK through scheduling. Under the Act, any works affecting a Scheduled Monument (SM) require Scheduled Monument Consent (SMC) from the appropriate heritage body (Historic England in England, Historic Environment Scotland, Cadw in Wales, or the Northern Ireland Environment Agency). While many offshore and intertidal areas remain unscheduled due to low baseline data, this Act still applies where such designations exist or are identified during survey.

3.3.4 Similarly, the *Planning (Listed Buildings and Conservation Areas) Act 1990* protects listed buildings and conservation areas. Section 66 of the Act requires decision makers to have "special regard" to the desirability of preserving a listed building or its setting when determining applications. This is especially pertinent for onshore infrastructure related to renewable schemes (e.g., solar panels, wind turbines, substations or cable landfalls) which may be sited near or within the setting of those heritage assets. Listed Building Consent (LBC) is required for any works that would affect a listed building's character as a building of special architectural or historic interest. Moreover, Section 72 imposes a duty to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas, which may be impacted by visual or physical changes brought by renewable installations.

3.3.5 The *Protection of Wrecks Act 1973* provides protection for shipwrecks in UK territorial waters that are of historic, archaeological, or of artistic importance. Sites designated under this Act become Restricted Areas, requiring a licence from the relevant heritage body to dive or conduct works. For offshore renewables, this means careful routing of cables, foundations, or anchors to avoid these protected areas. Emergency designations may also occur if new discoveries emerge during development.

3.3.6 The *Protection of Military Remains Act 1986* prohibits unauthorised disturbance of military aircraft and vessels lost during service. It establishes two designations: protected places, where interference is restricted, and controlled sites, where entry and activities are prohibited without a licence. This is particularly relevant for offshore wind and wave developments, which may encounter such remains during geophysical survey or seabed works.

3.3.7 In marine and intertidal contexts, the *Merchant Shipping Act 1995* is also relevant. It governs the recovery and ownership of "wreck" materials (defined broadly) and requires all such material recovered in UK waters to be reported to the Receiver of Wreck. Where archaeological material is found and is also classed as Wreck, this Act operates in parallel with heritage protections and reporting under the PAD (Protocol for Archaeological Discoveries).

3.3.8 The *Hedgerows Regulations* 1997 provide statutory protection for certain hedgerows in England and Wales deemed "important" on historical, archaeological, or ecological grounds. Under the Regulations, the removal of qualifying hedgerows without prior notification and approval from the LPA is prohibited. Hedgerows can be designated as important if they mark boundaries predating 1850, relate to historic parish or manor boundaries, or are associated with archaeological features or historic landscape patterns. This is relevant where onshore renewable infrastructure—such as access tracks, cable corridors, or substations—intersects with historically significant field systems. In such cases, developers must undertake appropriate heritage assessment and may be required to avoid or mitigate impacts, reinforcing the role of hedgerows not only as ecological corridors but as tangible elements of the historic environment.

3.3.9 From a planning perspective, both designated and non-designated heritage assets, including below-ground archaeology, must also be considered. The NPPF defines these assets and requires decision makers to assess their significance and apply proportionate protection. For renewable energy schemes, particularly onshore wind or solar farms, this often involves desk-based assessments. This then informs the need for field evaluation such as geophysical survey, and evaluation trail trenching, all conducted under the Chartered Institute for Archaeologists' Standards and Guidance, and usually formalised through a Written Scheme of Investigation (WSI) (CifA, 2020; NPPF, 2024).

3.3.10 To aid interpretation and implementation, Historic England has produced a suite of Historic England Advice Notes (HEANs), Good Practice Advice Notes (GPAs) and other guidance.[7] Key documents relevant to renewable energy development include:

- **Conservation Principles, Policies and Guidance (2008)** – outlines how to understand and assess heritage significance and manage change, essential in balancing renewable infrastructure needs with heritage impact.
- **GPA 3: The Setting of Heritage Assets (2017)** – details how to assess impacts on setting, a critical issue for solar farms, wind turbines, and substations. It draws on the concept of "significance" and provides structured methodologies for landscape and viewshed assessments.
- **GPA 2: Managing Significance in Decision-Taking in the Historic Environment (2015)** – provides procedural guidance for LPAs and developers, including how to apply policies in practice.
- **HEAN 15: Commercial Renewable Energy Development and the Historic Environment (2021)** – explicitly aimed at interpreting impacts of renewable energy projects, it recommends staged approaches to mitigation (avoidance, reduction, offsetting) and highlights the need for better integration with marine planning regimes.

3.3.11 In addition, developers are often required to implement mitigation strategies including archaeological exclusion zones (AEZs) and Temporary Exclusion Zones (TEZs) in offshore contexts. These are typically governed by the *Protocol for Archaeological Discoveries* (PAD), supported by the Crown Estate and managed through an Implementation Service (IS), as outlined in Wessex Archaeology's 2014 Protocol. The PAD allows for responsive reporting of chance finds during construction phases where a formal watching brief is not feasible (Wessex Archaeology 2014). See Paragraph 3.4.7 for more on the Protocol.

3.4 Context and Background of Renewable Energy and the Historic Environment

3.4.1 The Chartered Institute for Archaeologists (CIfA) and the Council for British Archaeology (CBA) responded to consultation on Historic England's Advice Note 15 (see Paragraph 3.3.10) on Commercial Renewable Energy Development and the Historic Environment (CIfA & CBA 2020). They broadly support the advice, especially its references to CifA standards and the emphasis on professional accreditation. However, they suggest the Note could be significantly improved by incorporating more illustrative examples of renewable energy types and their impacts on heritage assets, thereby clarifying the staged process of harm avoidance, mitigation, and benefit evaluation. They also emphasised the need to distinguish between general and specific guidance more clearly, and to align terrestrial and marine planning practices appropriately, noting several instances where marine considerations were insufficiently addressed or inconsistently integrated.

3.4.2 Their response also raises concerns about the clarity of technical terminology, selective and potentially misleading quotations from existing guidance, and the omission of key development types like onshore wind and hydroelectric power. CIfA and the CBA called for a more systematic referencing approach, including important documents like EN-3 and offshore wind guidance. Further points address misinterpretations around the concept of "reversibility," visual impact assessments, and the importance of distinguishing between different decision makers. CifA and CBA also recommended that setting and visual

[7] Note that other organisations have also provided guidance, such as CIfA, IHBC and IEMA's 2021 '*Principles of Cultural Heritage Impact Assessment in the UK*'.

assessments be more accurately framed in terms of heritage significance, and advocate for refining the discussion around archaeological exclusion zones and cumulative impacts.

3.4.3 Meanwhile, the trade statement by Solar Energy UK (Solar Energy UK 2024), which thanks CIfA for their support drafting the position statement, sets out a framework for the assessment of buried archaeological remains in the context of solar farm development. It emphasises a commitment to protecting the historic environment, aligning with national planning policy and professional standards, while promoting proportionate assessment practices. The document reflects on what SEUK consider to be inconsistent application of archaeological evaluation across projects and encourages more sustainable, context-sensitive decision-making that recognises the potentially low physical impact of solar infrastructure.

3.4.4 Subsequently, CIfA has developed *Archaeology and Solar Farms: Good Practice Guide* as a toolkit for developers, archaeological advisors, consultants and contractors which, as of September 2025, is in the consultation draft stage.

3.4.5 Further, the position statement highlights that solar farms differ fundamentally from other types of development due to their minimal ground disturbance—particularly where pile-driven mounting systems are used. It argues that, in most cases, the risk of significant archaeological harm is extremely low and often overstated. It also suggests that solar farms can offer heritage benefits by removing land from intensive ploughing, which might otherwise degrade buried remains. That said, Solar Energy UK does recognise exceptions for sensitive archaeological contexts, such as waterlogged or human remains, where non-invasive foundations and development exclusion zones should be considered. However, these conclusions have been contested by various heritage bodies and remain debated.

3.4.6 In planning terms, Solar Energy UK advocate for a pragmatic, evidence-based approach that prioritises non-intrusive evaluation methods such as desk-based assessments and geophysical surveys. The industry warns against defaulting to trial trenching regimes suited to far more disruptive developments, citing the unnecessary carbon emissions and environmental disruption involved. Instead, it recommends post-consent conditions as a more sustainable means of managing archaeological risk, reflecting the shared goals of both the renewable energy and heritage sectors in reducing environmental impact and promoting long-term preservation.

3.4.7 As for offshore developments, the *Protocol for Archaeological Discoveries (PAD)* for offshore renewables outlines a formal framework for identifying, reporting, and managing unexpected archaeological finds during marine and associated land-based construction activities (Wessex Archaeology 2014). Developed by Wessex Archaeology for The Crown Estate, it acts as a safety-net complementing, not replacing, early-stage impact assessments and Written Schemes of Investigation (WSIs). The Protocol recognises key challenges unique to offshore environments: construction often operates 24/7, across multiple vessels, making conventional archaeological monitoring (such as watching briefs) impractical and cost-ineffective. There is also a lower baseline of archaeological knowledge at sea, increasing the likelihood of unexpected discoveries, while the ability to respond or adapt construction activity around such discoveries is often limited. The PAD mitigates these constraints by establishing roles (e.g., Site Champion, Nominated Contact) and a clear reporting chain, with measures like Temporary Exclusion Zones (TEZs) and Archaeological Exclusion Zones (AEZs), mentioned in Paragraph 3.3.11, to manage risk and protect heritage. An Implementation Service (IS) had supported (but not longer does) the protocol, which facilitated expert advice and coordination between developers, archaeological curators, and regulators. The initial funding arrangement for PAD by The Crown Estate included resourcing an IS to specifically support the Protocol. Although there is no centralised IS, the requirement to establish a PAD continues to be stipulated within deemed Marine Licences of offshore wind farm DCOs, so Consent Holders and their

consultants, including retained archaeological advice services, implement a PAD, based on the structure published in 2014.

3.4.8 Legal compliance is another cornerstone of the Protocol, ensuring alignment with the *Protection of Wrecks Act, Treasure Act, Protection of Military Remains Act,* and others. It covers a wide scope of archaeological material—from artefacts and structures to geophysical anomalies—and provides practical guidelines for handling and storing finds, particularly fragile waterlogged items. The Protocol also addresses the challenge of fragmented awareness by incorporating training and awareness programmes tailored to the working realities of marine construction teams. Wessex Archaeology underscore that for PAD to function effectively, all components—reporting systems, training, and the IS—must be fully resourced and operational. The Protocol helps both archaeologists and developers navigate the complexities of the offshore environment through consistent and responsible reporting while ensuring the protection and understanding of the UK's marine historic environment.

3.4.9 It is important to acknowledge the essential role and function of post-consent marine archaeological Written Schemes of Investigation (WSI).[8] The EIA exercise for an offshore wind farm will broadly characterise an area proposed for development, which will comprise low resolution survey (and no marine geotechnical survey campaign(s) prior to consent is not unusual) with corroboration where possible from desk-based sources of information (e.g. charted shipwreck losses held by the UK Hydrographic Office which are predominantly 20th Century). The WSI provides an essential instrument to inform subsequent survey campaigns (should authorisation be obtained) which increase in resolution as the engineering design is refined. It is therefore highly likely during any post-consent/pre-construction phase that unknown heritage assets will be discovered and avoided (by implementing Archaeological Exclusion Zones). The PAD system really is a final reporting mechanism, just in case a site is discovered during construction. It's therefore likely that the site will have been impacted so the PAD should support rapid communication between key parties to support subsequent decision-making. Ideally, effective implementation and delivery of a post-consent WSI means that very little should be reported through PAD.

3.4.10 It is worth referencing the Marine Data Exchange Heritage Accelerator (MDEHA) project for The Crown Estate's Offshore Wind Evidence and Change (OWEC) programme. The project is centred on improving the heritage information that is available to support consenting (and wider strategic planning) – brief details here: Accelerating Clean Energy Offshore.[9] Further, Historic England are engaged in discussions with a government-backed initiative on consenting practice for offshore wind led by The Crown Estate known as the Offshore Wind Evidence and Knowledge Hub.[10]

3.4.11 Overall, renewable energy developments present unique challenges and opportunities for heritage and archaeological assessment, as outlined by UK archaeology consultant Abrams Archaeology (Abrams 2020). Wind farms require a particularly robust evaluation of setting impacts, often across a wider area than for other developments. Their flexibility in design means that turbines can frequently be relocated slightly to preserve archaeological remains in situ—minimising both cost and heritage impact. However, associated cabling (both between Wind Turbine Generators and electricity export cabling to a landfall location) might not have the same installation flexibility which can lead to heritage assets being unavoidable. Through the implementation of a project WSI the appropriate action can be

8 The Crown Estate published revised guidance in July 2021 reflecting sector practice and the central role that WSIs play in consenting and construction.
https://www.datocms-assets.com/136653/1720791439-guide-to-archaeological-requirements-for-offshore-wind.pdf
9 Accelerating Clean Energy Offshore (2025), https://historicengland.org.uk/advice/planning/infrastructure/renewable-energy/accelerating-clean-energy-offshore/
10 See OWEKH - https://owekh.com/

taken for recovery, conservation, archiving, and so forth. Meanwhile, solar farms, whilst considered less intrusive in terms of the areas of piling due to individual small-diameter piles, do involve areas of ground disturbance (such as fencing, inverters, substations, access roads, cable runs) necessitating a nuanced and tailored archaeological approach. Although setting impacts are typically confined to a smaller area than as for wind farms, careful planning is still essential to ensure successful outcomes. Both types of development usually require an Environmental Impact Assessment covering heritage issues, and because they often span large sites, early involvement of heritage professionals enables informed, low-risk design decisions through optioneering and layout adjustments. This flexibility in design offers a valuable opportunity to align development with archaeological and cultural heritage preservation.

3.5 Planning and Climate Change

3.5.1 As detailed in drp archaeology's 2021 *The Heritage Dimension of Commercial Renewable Energy Development in Planning* report, and as indicated above, climate change is an increasingly important consideration in the planning system in England.

3.5.2 The NPPF emphasises the role of planning in shaping places that contribute to radical reductions in greenhouse gas emissions, minimising vulnerability, and increasing resilience to climate change (paragraph 161). LPAs are required to adopt proactive strategies to mitigate and adapt to climate change, in line with the Climate Change Act 2008, which legally commits the UK to achieving net zero carbon emissions by 2050. Plans and decisions should take into account the long-term impacts of climate change, including flood risk, coastal change, and overheating.

3.5.3 Renewable energy development is a key element of national climate mitigation efforts, and planning policy supports this through a presumption in favour of sustainable development. The NPPF encourages local authorities to support renewable and low carbon energy projects, including wind, solar, hydro, and biomass, provided that environmental and heritage considerations are appropriately addressed. The Planning Practice Guidance (PPG) on Renewable and Low Carbon Energy outlines how planning authorities should assess potential sites and balance energy needs with environmental constraints. For example, the need to transition to clean energy must be weighed against potential impacts on landscape character, biodiversity, and heritage assets.

3.5.4 In addition to the NPPF and PPG, key national policy statements under the Planning Act 2008 provide further guidance. EN-1 (Overarching National Policy Statement for Energy) sets out the government's policy for delivering major energy infrastructure, recognising climate change mitigation as a primary objective. EN-3 (Renewable Energy Infrastructure) provides specific guidance on assessing and consenting to technologies like offshore wind and biomass, while EN-5 (Electricity Networks Infrastructure) addresses infrastructure such as transmission lines and substations needed to support the transition to renewable energy. These National Policy Statements are particularly relevant for NSIPs and help ensure that climate objectives are embedded into strategic decision-making across the planning system.

3.5.5 The Environment Act 2021 further reinforces this by introducing duties on biodiversity net gain and long-term environmental targets, ensuring that climate change remains a central consideration in both local and national development frameworks.

3.5.6 However, despite the strong policy framework supporting climate action through planning in England, several critiques and gaps remain. One key concern is the inconsistency in how local authorities interpret and implement climate-related policies, particularly given resource constraints and varying levels of expertise. While the NPPF encourages renewable

energy and climate resilience, it lacks enforceable standards or mandates, leading to uneven application across regions.

3.5.7 Currently, there is also limited integration between national energy planning and local place-making strategies, which can hinder coherent and community-sensitive climate responses. The planning system's ability to drive transformational change is dependent on strong legislative backing, clear guidance, and alignment between planning policy, funding mechanisms, and cross-sector climate strategies. However, the National Energy System Operator (NESO) is developing the Strategic Spatial Energy Plan (SSEP), the Regional Energy Spatial Plans (RESP) and the Centralised Strategic Network Plan (CSNP) which aim to increase integration. The SSEP is due for publication in 2026 with the CSNP and RESPs likely 2027. There is still work to do on how they will interact with the planning system at all levels.

3.6 Methods and Methodology – Limitations and Interpretation

3.6.1 Details of the methods and methodology used in this report can be found in Appendix 2. However, identified study limitations and interpretations remain in the main body of the report, below.

3.6.2 It is important to note that the English planning system is inherently iterative, with significant negotiation and dialogue often taking place outside of the formal documentation reviewed. As such, the findings of this study reflect the public-facing end point of each planning process, rather than the full extent of behind-the-scenes interactions between developers, consultants, planners, and consultees. Snippets of information held within published documents suggest these discussions were ongoing throughout the planning passage. This introduces limitations, particularly in understanding the role of informal negotiation, design evolution, and unpublished correspondence in shaping outcomes. It highlights the grey areas that this research does not scrutinise as a high-level only study.

3.6.3 Accordingly, the compiled data should be interpreted as capturing high-level procedural and outcome-based insights, rather than a complete record of all deliberations. However, the approach provides a valuable and scalable method for analysing how heritage is considered in practice within the renewable energy planning framework.

3.6.4 Another potential limitation in the methodology relates to the risk of error, including software error, human error and interpretative inconsistency, particularly as the analysis of planning documents was conducted collaboratively by a team of three researchers. Planning application materials are often complex, variably structured, and context-specific, which can lead to different readings or judgments, especially when interpreting the presence or quality of heritage assessments, the articulation of significance or harm, or the framing of planning decisions.

3.6.5 While the team developed a structured review framework and made consistent use of defined criteria aligned with Historic England guidance, the process inevitably involved subjective judgment. To mitigate these risks, the team held regular coordination meetings, clarified ambiguous definitions, and reviewed sample cases jointly to promote consistency. Nonetheless, some variability may remain, particularly in borderline or poorly documented cases, and this should be considered when interpreting the compiled results.

3.6.6 Further limitation results from the sample size, and the high level of categories assessed as NA, which signified that either the documentation was not available, or indeed the category being assessed was not relevant. For example, 'NA' would be used for a planning application that did not consider heritage. This methodological decision comes with its own set of limitations.

4 Results: DESNZ's Database on Renewable Energy Development

4.1 Overview of the 2019-2024 analysis

4.1.1 This analysis presents detailed findings from a structured review of 500 renewable energy planning applications in England between July 2019 and June 2024. Drawing on the DESNZ Renewable Energy Planning Database, supplemented by planning documentation from local authority portals, the analysis focuses on trends in heritage engagement, technology type, decision outcomes, and regional patterns.

4.1.2 For the purpose of this study, the team define "direct" impact as that which has or may have an immediate and/or obvious physical implication to a heritage asset (e.g., impact on below-ground archaeology caused by groundworks or impact on the fabric of historic buildings and structures). "Indirect" impact, for the purpose of this study, is that which affects or changes the setting or appreciative values, as the way in which a heritage asset is experienced through the surroundings (e.g., changes in views and vistas, changes to how the physical surroundings might disrupt significance, and/or sensory experiences). Whilst culminative impacts can also alter setting over time, it is not considered within this study.

4.1.3 Percentages represent that of the entire sampling size (n=500) unless otherwise indicated within the Paragraph and/or visualisations (table or figure). Furthermore, some percentages may not be representative if a large percentage of the query was assessed as not available or not applicable (NA). A query with a large proportion of NAs/Unknowns can reduce confidence levels and statistical significance of percentage results.

4.1.4 For the study, Microsoft Excel was used for analysis. Note that some formulas may miscalculate. All findings are presented as Excel formulas calculations without human adjustments. As such, there may be minute gaps in the percentage totals, of 0.80%. This will be visible in presented figures and tables.

4.2 Heritage Dimensions of Planning Applications: Comparisons

4.2.1 Before presenting the results from 2019-2024, this section offers a brief comparative overview of results from the previous 2014-2019 *Heritage Dimensions of Planning Applications* report (see Appendix 3).

4.2.2 Please note that the below comparison will have a marginal error as the comparison is between 458 entries (2014-2019 applications analysed) versus 500 entries (2019-2024 applications analysed). Also consider some entries were marked as NA (in which data was not available or applicable).

4.2.3 Between 2014-2019 to 2019-2024, applications for Renewable Energy Planning went up from 5,946 to 17,135 *without filters,* which is a 188% increase.

4.2.4 After adding filters, the 2014-2019 entries reduced to 458 applications; meanwhile, the 2019-2024 entries reduced to approximately 3,400 applications. This required further systematic filtering to reduce the number to 500.

4.2.5 Analysis of planning application status for the 2014-2019 data versus 2019-2024 highlight the former having a 61% approval rate and 17% refusal rate and the latter having a 68% approval rate and a 11% refusal rate.

4.2.6 In 2014-2019, heritage was considered in 62% of the applications; in 2019-2024, this rose to 73%.

4.2.7 Of the applications in which heritage was considered, there is a 6% rise in the consideration of designated sites (55%, 2014-2019; 61%, 2019-2024); an 9% rise in the consideration of

non-designated sites (51%, 2014-2019; 61%, 2019-2024); and a 11% rise of the consideration of both (45%, 2014-2019; 56%, 2019-2024).

4.2.8 Regarding the nature of impact, there is an increase for direct impact (11%); setting remains the same at 11% and the consideration of both has risen to 40%.

4.2.9 There is a significant rise in the use of non-intrusive assessments and evaluations: desk-based assessments rose from 44% to 51%; geophysics from 18% to 38%, and; heritage statements from 10 to 21%. Evaluations were conducted in 19% of applications.

4.2.10 Responses from either LPA heritage advisers (archaeology and/or conservation) have gone up from 50% to 64%. Responses from Historic England have a slight increase (25%, 2014-2019; 28%, 2019-2024).

4.2.11 Heritage included in decisions rose by 6% (29%, 2014-2019; 35%, 2019-2024).

4.3 Year of Submission

4.3.1 The data in Figure 1 shows a clear upward trend in renewable energy planning applications from 2019 (2.6%) to a peak in 2023 (32.8%). There's a significant increase from 2020 to 2022, which may reflect maturing policy frameworks and increased market activity. The minimal number between 2019 to 2020 is likely a reflection of the Covid lockdown during this time. A slight drop in 2024 (11.8%) is expected due to incomplete data for that year (which goes to June). This trend aligns with national targets and policy momentum post-2019 regarding net-zero commitments.

4.3.2 This should be viewed alongside the severe financial pressure faced by local government: whilst the 2019-2024 parliament 'only very partially undid the cuts seen in the previous decade' with 'generous real-terms increases in funding', these have been 'absorbed by rising demands and costs' with overall core funding between 18 to 26% lower per person in real terms (Ogden and Phillips 2024).

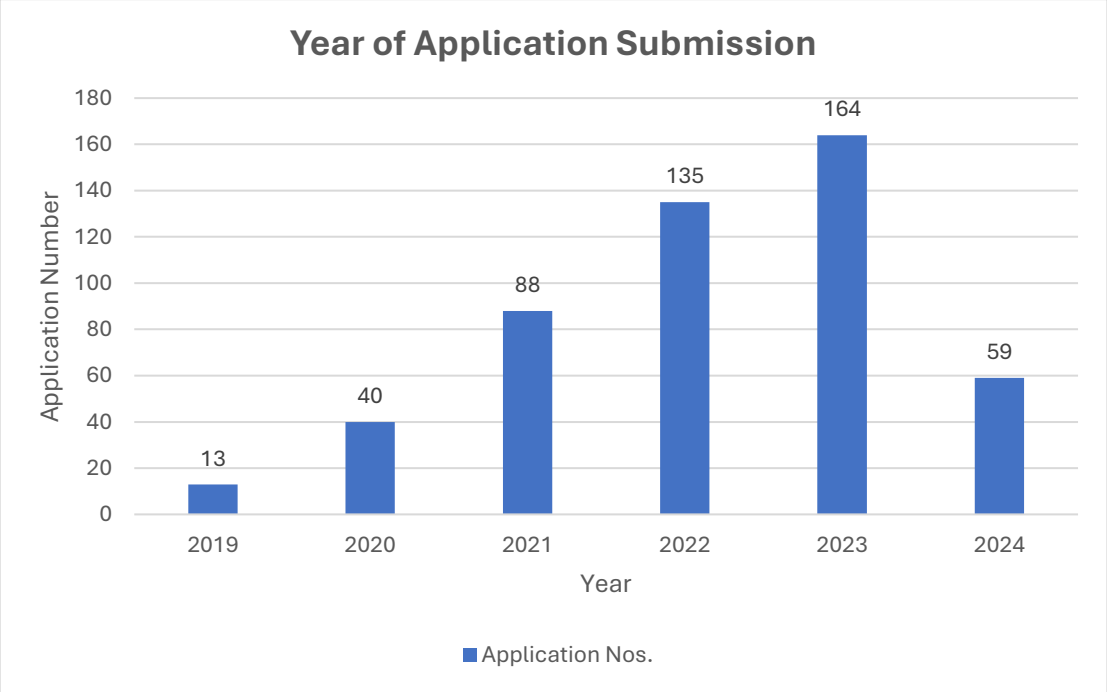

Figure 1 Number of Renewable Energy Applications per year (total = 500)

4.4 Planning Type

4.4.1 As shown in Figure 2, most applications were made under the TCPA route (92.8%, n=464), reflecting the dominance of local planning processes. Only 2.6% (n=13) were NSIPs. This supports the view that most renewable schemes (with the exception of solar voltaic roofs) fall under local determination thresholds. In the analysis, a few Decision Orders would write "Prior Development Order", which is not an official term, but likely means Prior Approval process under the General Permitted Development Order (GPDO) in England that was amended in 2015. PDOs allow certain types of development to proceed without needing full planning permission from the LPA, provided specific conditions are met. As a national policy instrument, it permits types of development automatically unless local restrictions (e.g., heritage designations) remove that right, such as an application for solar panels on the roof of a listed building or a domestic array within the back garden of a home that falls within an Archaeology Alert Area (AAA).

4.4.2 For example, solar panels or a small solar farm under 50kW may be allowed under Permitted Development without full planning application, if it meets criteria. However, it might still require Prior Approval for specific aspects (like siting, design, or archaeology), especially if close to heritage assets or in sensitive areas. Some usage of PDOs in Decision Notes likely refer to Prior Approval-required developments under Permitted Development Rights.

4.4.3 All recorded PDOs (n=16) were for solar photovoltaics roofs. Of these 16, only one had heritage as a consideration, with the only record of this consideration in the Decision Order notes, noting that there were no nearby heritage designations. Due to the high proportion of PDOs for solar voltaic roofs, as explained above, they were later filtered out of the research study sample to avoid assessing high numbers of PDOs (see Appendix 2).

4.4.4 NSIPS, as large-scale infrastructure projects, are more complex largely as a result of their physical size and therefore go into a level of detail and documentation that TCPAs do not, to satisfy the requirement of the Planning Act 2008. Where an average TCPA application may contain submitted documentation into the hundreds at most, NSIP applications typically extend into the thousands. Of the 13 NSIPs represented for this study, one was from 2019, one from 2021, two from 2022, four from 2023 and five from 2024. Four have been granted planning permission or are awaiting construction; eight have 'planning application submitted' as their planning status. It is worth noting that nearly offshore wind farm projects qualify as NSIP developments.

4.4.5 'Other' in this analysis includes Certificate of Lawful Existing Use or Development (CLEUD) and TCPA (PINS) of which there was 1 each. The former is not planning permission but rather legal confirmation that permission is either not required or deemed lawful by passage of time; the latter would mean an appeal to the Planning Inspectorate has been made under the powers set out in the TCPA.

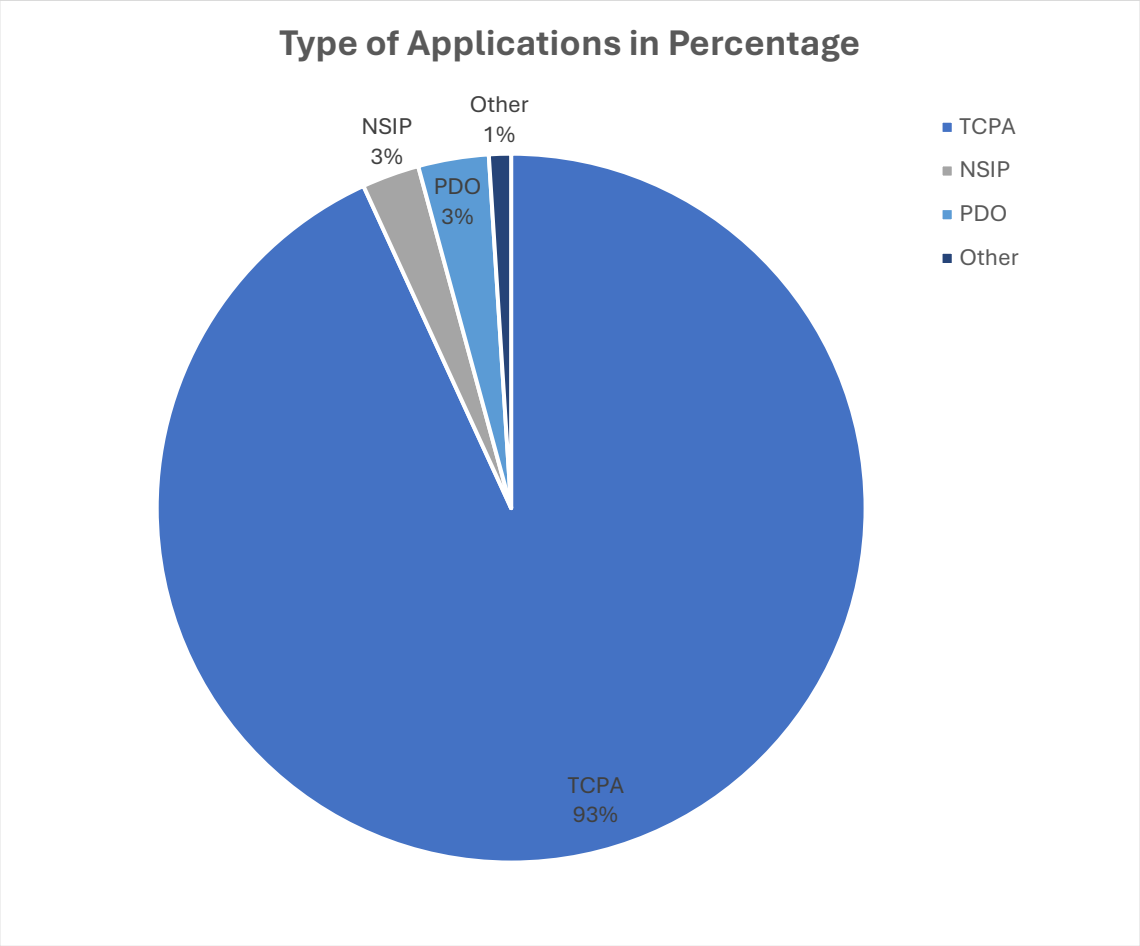

Figure 2 Percentage of Application Type

4.5 Determination Timelines

4.5.1 Figure 3 shows that of 438 applications that had the relevant dates available for assessment (NA=62, which may also mean a decision has yet to be made), only 29% (n=145) of applications were determined within the statutory consultation period. None of these were NSIPs. A large majority (58.6%, n=293) fell outside this, indicating widespread delays. This has implications for applicants, who often operate under time-sensitive response windows.

4.5.2 Statutory decision deadlines in England set out by the Town and Country Planning Action (1990) start on the validation date, when the LPA confirms it has all required information (see Table 1).

Table 1 Type of Development Application and Associated Statutory Limit for Decision

Type of Application	Statutory Limit
Non-major developments	8 weeks
Major developments	13 weeks
Applications requiring EIAs	16 weeks
Technical Details Consent & Public Service Infrastructure	10 weeks
Nationally Significant Infrastructure Projects	52 weeks

4.5.3 Non-major applications should be decided within 8 weeks; major applications within 16 weeks. Note for this analysis we put a limit of 16 weeks for all TCPA applications; all that were below 16 weeks, even if a non-major development, was assessed as within the consultation period. Meanwhile the NSIP process may take approximately 52 weeks. As such, we assessed NSIPs as within the consultation period if a decision was made within 52 weeks.

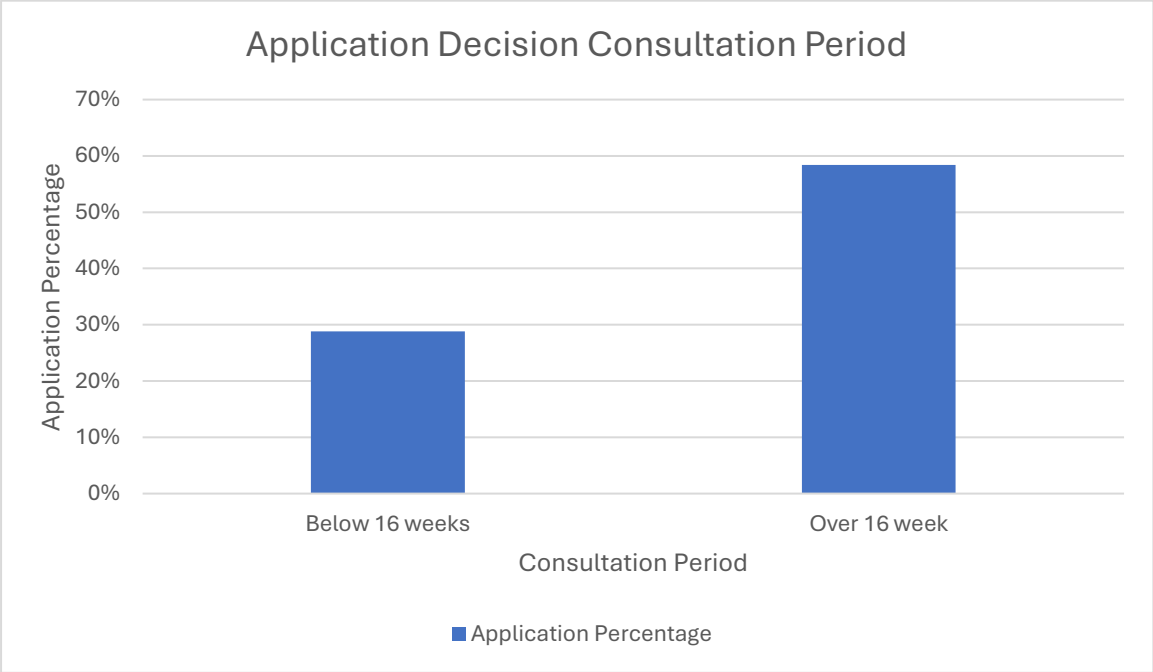

Figure 3 Weeks taken for an application decision (total application = 438)

4.5.4 It is not clear, and would require more detailed analysis, as to whether heritage advice and feedback contribute in any way to this delay. Our review of the application correspondence between applicant and heritage adviser overall does not indicate that heritage advice nor assessment/evaluation requirements held up the process pre-determination.

4.5.5 It will also require more detailed analysis to understand whether heritage-based conditions determined the planning status post-determination (as in, 'application granted' versus 'under construction').

4.6 Pre-Application Advice

4.6.1 The application form document submitted as part of the application proposal indicates whether an applicant entered into the pre-application (henceforth, pre-app) process, regardless of whether or not a scoping exercise was undertaken. On occasion, this data was not accurate (for instance, the application form might say pre-application was not entered, but documentation (e.g., a sentence in a report) would suggest otherwise.

4.6.2 The efficiency of the pre-app process requires further analysis: in this quick review we only recorded whether an application entered into pre-app and did not distinguish between minor and major developments. Anecdotally, it is important to highlight whether pre-app represents an additional non-compulsory requirement onto LPA historic environment teams beyond their priority of responding to planning applications and if so whether resource and capacity become a barrier to engaging with pre-app advice to start with.

4.6.3 As shown in Table 2, pre-app advice was sought in 59% (n=295) of applications, showing that early engagement is common but by no means universal. Given the importance of early-stage heritage assessment, the absence of pre-app in over a third of cases (37%, n=186) could reflect missed opportunities that can shape schemes proactively.

Table 2 Results of whether pre-application was entered.

Pre-App Sought	Number	Percentage
Yes	295	59.00%
No	186	37.20%
Unknown	19	3.80%
Total	500	100.00%

4.6.4 Brief scoping discussions with five stakeholders involved in development-led archaeology suggest the benefits of entering pre-app reduced risk by early identification of heritage considerations. Four agreed that it can save time and provide sound guidance prior to planning application protocol. There was no consensus on whether it increases success of planning consent nor whether it is cost effective.

4.6.5 One heritage consultant noted, “The detail of pre-application advice varies by authority and that influences which [benefit] is relevant. When it works well by identifying key issues, then it can be very helpful, enabling me as a heritage consultant to help advise the applicant” (pers.comm., J. Abrams, 2025).

4.6.6 Meanwhile, an LPA Heritage Adviser from the scoping discussions noted that in terms of Historic England being approached for comment, it “depends entirely on the nature of the project and whether there are any designated heritage assets or those of equivalent significance. The LPA would not normally consult Historic England during a pre-application because we have been told that they prefer applicants to use their own pre-app service. We may inform them that one has been received, but due to the private nature of pre-applications we would need the applicant's consent to consult them” (pers.comm., LPA Heritage Adviser, 2025).

4.6.7 The scoping exercise also pointed to how the pre-application process can influence focus for data gathering and can also influence design by avoiding sensitive areas.

4.6.8 A suggestion raised by one heritage consultant respondent was that a bespoke pre-application process specifically for renewable energy development planning may well be a pathway to enhanced efficiency of the pre-application process.

4.6.9 Further analysis of pre-application processes is needed, with a more nuanced approach to what types and size of sites it best serves, and whether pre-application advice is followed prior to submission, partially or in its entirety. For example, feedback found in documents on the Local Authority/Council planning portals revealed that in some cases, either no assessment reports or rushed reports of pre-application work were submitted during the submission stage, causing LPA heritage advisers to either not be able to make a credible assessment or need to return reports for more information.

4.6.10 Analysis explored (a) whether an application entered into pre-application; (b) whether or not it was determined within the 16-week consultation period for TCPAs or 52-week

consultation period for NSIPs, and; (c) whether or not the planning status was recorded as either granted (including permission expired and awaiting construction) or refused.

4.6.11 Table 3 presents these results, revealing that pre-application approval planning consent rates overall is 14% higher than those that did not enter into pre-app. However, applications that did not enter into pre-app were more likely to have decisions determined within the consultation period timeframe. These results warrant further investigation to better understand the types of planning applications that enter into pre-application and the complexities of those applications.

4.6.12 Note the discrepancy between 'App No.' and 'Application Accepted' and 'Application Refused' (e.g., 'App No.' is not the sum of the two) as 'App No' includes Appeal Granted, Awaiting Decision, Application Withdrawn, and Application Submitted which do not fall into accepted nor refused decision outcomes. For this Table, we only look at applications that have been accepted or those that have been refused which also had details about pre-app and consultation periods. Therefore, the sample size total here is 418.

Table 3 Understanding Pre-Application Efficiency in Planning Process

Pre-App Efficiency	App No.	Application Accepted	Application Refused	Percentage Accepted from total (n=418)	Percentage Refused from total (n=418)
Pre-application and within consultation period	48	34	7	8%	2%
Pre-application and outside of consultation period	201	156	30	37%	7%
No pre-application and within consultation period	83	68	6	16%	1%
No pre-application and outside consultation period	86	63	12	15%	3%

4.7 Consultation Period and Decision Timing

4.7.1 Table 4 and Table 5 below only consider applications that fit the criteria of (1) having a definitive response ("Y" (yes) or "N" (no)) to the consultation period query; (2) a planning status or either granted (including permission expired or awaiting construction) or refused; and (3) having a heritage objection. As such, the total application number is 319 (the sum of Table 4 and Table 5), not 500. NA responses were not included as part of this analysis.

4.7.2 It is noted from the presented data that when outside of the consultation timeframe, heritage objections appear to be more often overridden.

Table 4 Within Consultation Period, Planning Decision, and Heritage Advice

Consultation Period	App No.
Within Consultation Period & Application Granted	113
Within Consultation Period & Application Granted w/ Heritage Objection	2
Within Consultation Period & Application Refused	13
Within Consultation Period & Application Refused w/ Heritage Objection	1
TOTAL	**129**

Table 5 Outside Consultation Period, Planning Decision and Heritage Advice

Consultation Period	App No.
Outside Consultation Period & Application Granted	156
Outside Consultation Period & Application Granted w/ Heritage Objection	13
Outside Consultation Period & Application Refused	13
Outside the Consultation Period & Refused with/ Heritage Objection	8
TOTAL	**190**

4.8 Exploring Heritage-based Objections and Refusal Recommendations

4.8.1 If we are to look at the complete dataset, as shown in Table 6, we see a total of 26 heritage objections across all the various development stages, making up only 5.20% of the 500 applications. Heritage refusal from LPA heritage advisers makes up a total of 24 applications, or 4.8% of the 500 applications analysed. Of those 24, 20 were refused planning permission, two were granted permission, and two appealed the decision (which were then approved).

4.8.2 Together, heritage-based objections and refusal recommendations make a total of 52 applications (10% of the study sample). As it would be important not to double-count objections that have led to refusal recommendations, we further analysed to what extent refusal decisions were based on heritage consultee advice: only 21% (n=12) of applications refused were based on LPA heritage advice; 49% (n = 28) were not. This is understood through the Decision Notice clearly referencing heritage advice for refusal as part of its rationale as opposed to no reference or relationship established via documentation. The remaining 30% was marked as NA as no clear analysis could be determined (see Section 4.16 4.16.1 for further details).

4.8.3 This data suggests that heritage objections and refusal advice from LPA heritage advisers are not common; rather, in-depth analysis of the documentation revealed that LPA heritage advisers tend to work on applications through a 'case-by-case' approach which is reflective of the discretionary and plan-led style of planning in England, and that they are flexible as part of the process, including with their requests, recommendations and conditions.

4.8.4 For example, for a particular application on a site with noted potential non-designated archaeological remains identified during a geophysical survey in Wiltshire (Planning Reference PL/2024/06048; status: application submitted), the archaeology adviser (response, 20 Feb 2025) noted that further work would no longer be needed to assess archaeological implications prior to determination due to the applicant revising their proposed layout plan. Correspondence from the archaeological adviser stated:

> *"Thank you for sending me the revised site layout plan for the proposed solar array at Sloperton Farm, Bromham. This revised array will avoid any impact on the archaeological activity that was identified in the southern third of the site by the geophysical survey carried out last month. I therefore have no further archaeological issues that I would wish to raise in regard to this planning application."*

4.8.5 What the above example demonstrates is that in some cases, LPA heritage advisers might recommend a 'holding objection' whilst waiting for requested assessments to be delivered. In the above example, the heritage adviser had concerns regarding the heritage, it was then

addressed within the planning stages which meant all heritage-based concerns were alleviated, using the bespoke case-by-case approach facilitated by planning policies.

4.8.6 The analysis highlights a complex situation in that the pathway of heritage advice to decision is not always explicit in documentation. The data shows that objections put forward by heritage advisers can later be withdrawn, and that it can be used as a means to ensure heritage assessment/evaluation are delivered.

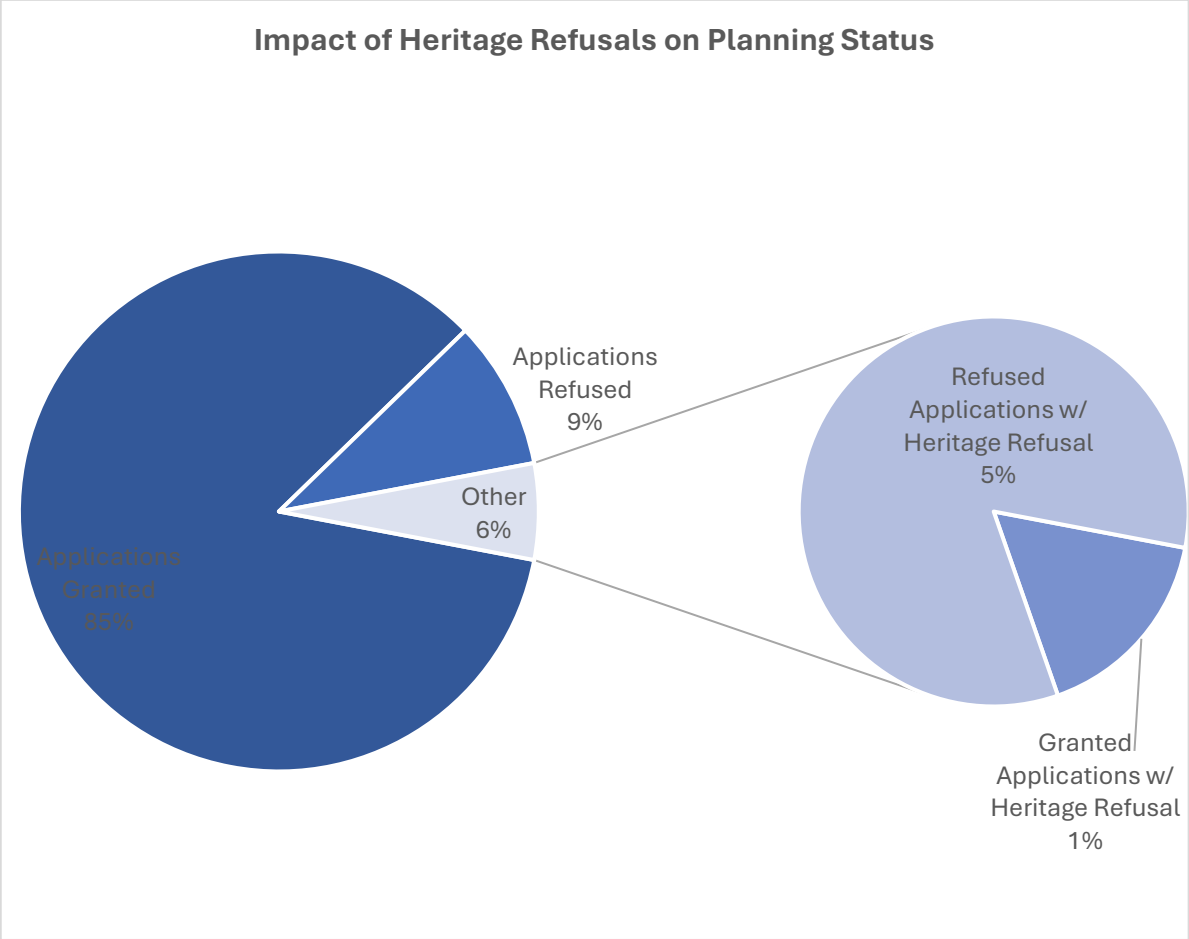

Figure 4 Impact of Heritage Refusals on Planning Status

4.8.7 Diving further into heritage-based refusals, Figure 4 highlights that of the applications that were approved or refused only (n=396, not 500), only 1% of those granted planning permission had a heritage-based refusal recommended by the heritage adviser, and only 5% of those refused had a heritage-based refusal recommended.

4.8.8 To be clear, Figure 4 presents granted or refused applications only and uses a sample size of 396. Applications not included are with the status of: abandoned, submitted, withdrawn, revised, awaiting decision. As such the 85% approval rate (total = 396: 339 approved; 57 refused) will be different from the approval rate of 67.8% (out of the 500-application sampling size) mentioned below in Paragraph 4.9.1.

4.9 Development Status across Regions and Counties

4.9.1 As shown in Table 6 below, 67.8% of applications from the 2019-2024 sample have been granted planning permission (this includes 'Awaiting Construction', 'Operational or Under Construction', 'Expired' and 'Appeal Granted' (those that appealed where subsequently approved)). 11.4% were refused permission.

4.9.2 The data shows that only a small percentage of applications that have either heritage-based objections or refusals suggesting heritage considerations are rarely the primary cause of refusal, although they can still be a decisive factor. It could also reflect good assessment during the application process, or flexibility of LPA heritage advisers with acceptable mitigation strategies to ensure heritage does not become a reason for refusal. This is discussed more in Section 4.16.

4.9.3 Table 7 presents application numbers according to England's regions, and details on their planning stage. It also highlights approval and refusal rates by region. As mentioned earlier, it would not be appropriate to compare percentages across regions as the approval/refusal rates are based on *the total application number within the specific region only* (i.e., not from the total 500 sample size).

4.9.4 The South West (73.3% of 91 applications) and Eastern (70.8% of 89 applications) regions have the highest approval rates, while the West Midlands (63.5% out of 63 applications) shows higher refusal rates (19% out of 63 applications). The Isle of Man and London had too few cases to interpret with confidence. These patterns may reflect development initiatives, land use capacity, and local authority capacity. Further analysis is needed with a larger and comparable sample size.

4.9.5 Table 8 further granulates the data to county-specific level by presenting the total number of applications in that county, and approved and refused applications only. Applications with the status of abandoned, submitted, withdrawn, revised and awaiting decision are considered in the total number of applications, but would not be the sum of the approved and refused application numbers. For example, Bedfordshire has a total of 12 applications across various planning stages, but only 6 that have been accepted, and 1 that has been refused (thus far).

4.9.6 The Table shows that Essex (26 applications; 15 granted; 4 refused) and Somerset (26; 12 granted; 4 refused) have highest number of applications. High approval rates can be seen in counties such as Norfolk (69% approved (n=11 out of 16); no refusals), and Suffolk (71% approved (n=10 out of 14); 7% refusal (n=1)).

4.9.7 Refusal rates are relatively low in most counties. Shropshire (32%; n=6 out of 19) and West Midlands (29%, n=2 out of 7) show higher numbers of refusals.

4.9.8 It is important to reiterate that the data sample removed solar photovoltaic roof applications. This will have substantial impact on representation across London among other counties, for instance. See Appendix 2 for details.

Table 6 Development Status of Selected Entries, and Heritage Objections and Refusals

Dev't Status	Granted	Abandoned	Refused	Submitted	Withdrawn	Awaiting Construction	Under Construction or Operational	Planning Expired	Appeal Granted	Awaiting Decision	TOTAL	Permission Granted Percentage from Total	Refuse Percentage from Total
App No	86	1	57	74	26	184	57	4	8	3	**500**	**67.80%**	**11.40%**
Dev't Status w/ Heritage Objection	4	0	9	1	1	7	2	0	2	0	**26**	**3.00%**	**1.80%**
Dev't Status w/ Heritage Refusal	1	0	20	0	0	1	0	0	2	0	**24**	**0.80%**	**4.00%**

Table 7 Development Status Across England's Regions

Region	Application Total	Granted	Refused	Withdrawn	Expired	Submitted	Awaiting Decision	Awaiting Construction	Appeal Granted	Acceptance Percentage	Refuse Percentage
East Midlands	64	32	7	0	0	12	0	12	0	**68.8%**	**10.9%**
Eastern	89	52	9	5	1	12	0	10	0	**70.8%**	**10.1%**
Isle of Man	1	0	0	0	0	0	0	1	0	**100.0%**	**0.0%**
London	2	1	0	0	0	1	0	0	0	**50.0%**	**0.0%**
North East	26	15	2	1	0	5	0	3	0	**69.2%**	**7.7%**
North West	31	17	5	3	0	4	0	2	0	**613%**	**16.1%**
South East	73	35	10	7	0	8	0	13	0	**64.8%**	**14.1%**
South West	91	46	7	5	0	12	0	20	1	**73.3%**	**7.8%**
West Midlands	63	30	12	4	0	7	0	9	1	**63.5%**	**19.0%**
Yorkshire & The Humber	56	25	5	2	0	11	1	12	0	**66.1%**	**8.9%**
Offshore	**4**	**2**	**0**	**0**	**0**	**2**	**0**	**0**	**0**	**0.5%**	**0**
Total Application	**500**	**255**	**57**	**27**	**1**	**72**	**1**	**82**	**2**	**68.10%**	**11.56%**

Table 8 Granted versus Refused Status Across England's Counties

County	Total Applications (incl. Submitted, Withdrawn, Abandoned, and so forth)	Permission Granted	Application Refused
Bedfordshire	12	6	1
Berkshire	5	1	0
Buckinghamshire	13	5	4
Cambridge	1	1	0
Cambridgeshire	13	7	1
Cheshire	8	5	3
Cleveland	5	1	1
Cornwall	9	5	2
County Durham	6	6	0
Cumbria	6	3	0
Derbyshire	10	6	0
Devon	17	10	0
Dorset	11	5	0
East Riding of Yorkshire	15	8	1
East Sussex	3	2	0
Essex	26	15	4
Gloucestershire	7	4	1
Greater Manchester	1	0	0
Hampshire	13	8	0
Hereford & Worcester	2	2	0
Herefordshire	3	2	1
Hertfordshire	6	2	1
Isle of Man	1	0	0
Isle of Wight	2	0	0
Kent	15	9	3
Lancashire	12	7	0
Leicestershire	13	5	0
Lincolnshire	22	7	4
London	2	1	0
Merseyside	4	2	2
Milton Keynes	1	0	0
Norfolk	16	11	0
North Yorkshire	12	3	3
Northamptonshire	11	7	0
Northumberland	8	4	0
Nottinghamshire	14	8	3
Oxfordshire	12	7	1
Shropshire	19	9	6
Somerset	26	12	2
South Gloucestershire	2	1	1
South Yorkshire	7	3	0
Staffordshire	8	3	1
Suffolk	14	10	1
Tyne and Wear	7	4	1
Warwickshire	13	5	0

West Berkshire	1	0	0
West Midlands	7	5	2
West Sussex	8	4	1
West Yorkshire	9	6	1
Wiltshire	19	9	1
Worcestershire	8	3	1
Yorkshire	5	4	0
Offshore	4	2	0
Total	494	255	54

4.10 Technology Type and Technology by Region

4.10.1 Most applications were for solar (89%, n=446), followed by biomass (4.6%, n=23) and onshore wind (3.2%, n=16). This dominance of solar presented in Table 9 illustrates the overall trends revealed in this research. As explained in Paragraphs 9.3.7 and 9.3.8, it should be noted that the figures were subject to further filtering after brief analysis in which roof solar photovoltaics dominated the selection of 500 applications of the REPD.

4.10.2 Solar dominates in all regions, especially the South West and Eastern regions. Biomass and EfW are concentrated in the East Midlands and South West, while onshore wind appears most in Yorkshire and the Northwest. This may reflect regional infrastructure, land use, and policy preferences.

4.10.3 As Table 10 presents, solar photovoltaics have a 58% approval rate and 11% refusal rate. The remaining 31% of applications are in various planning stages (i.e., abandoned, submitted, and withdrawn).

4.10.4 It is again complex to interpret these statistics. For example, Biomass applications (n=23) have a 4% approval rate when deduced from the total sample size of 500 applications. However, this increases to 31% if looking at approved applications against the total number of biomass applications (i.e., 7 approved applications out of 23 biomass applications). Both have their role in enhancing how renewable energy application processes are understood.

4.10.5 Further detail of the nuances of refusal (size, type, site allocation) would be useful. For example, because solar farms can occupy agricultural land, Agricultural Land Classification (ALC) can frequently be cited as grounds for refusal, especially for those sites that fall within Grade 1 to 3a.

4.10.6 Meanwhile Offshore Wind developments remain minimal in the sample size (4 projects), requiring huge amounts of work under the NSIP-based consent route for such schemes. Whilst their approval rating overall is 0.40%, against the total number of Offshore Wind applications, it is 50% as two are categorised as awaiting or under construction, or indeed operational.

Table 9 Technology Type Representation

Technology Type	Biomass	EfW	Solar	Offshore Wind	Onshore Wind
Number	23	11	446	4	16
Percentage	4.60%	2.20%	89.20%	0.80%	3.20%

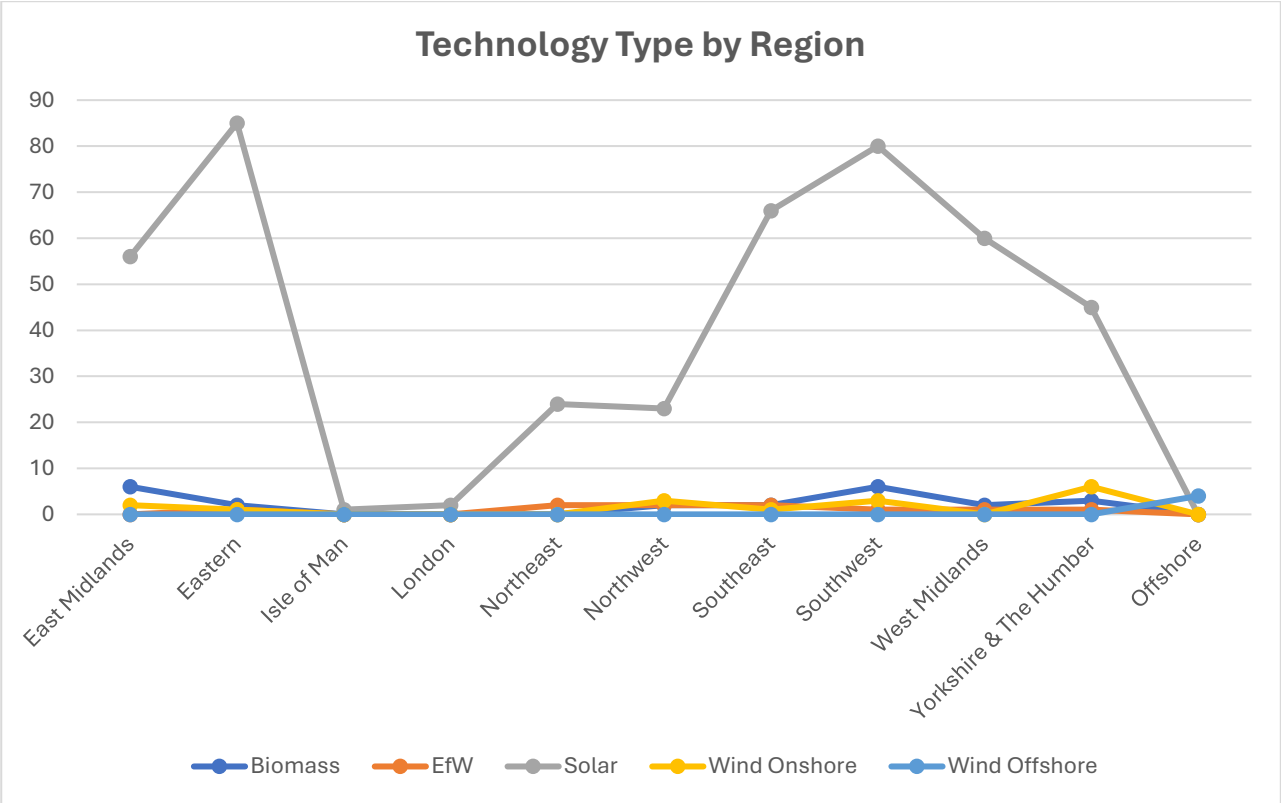

Figure 5 Technology Type by Region

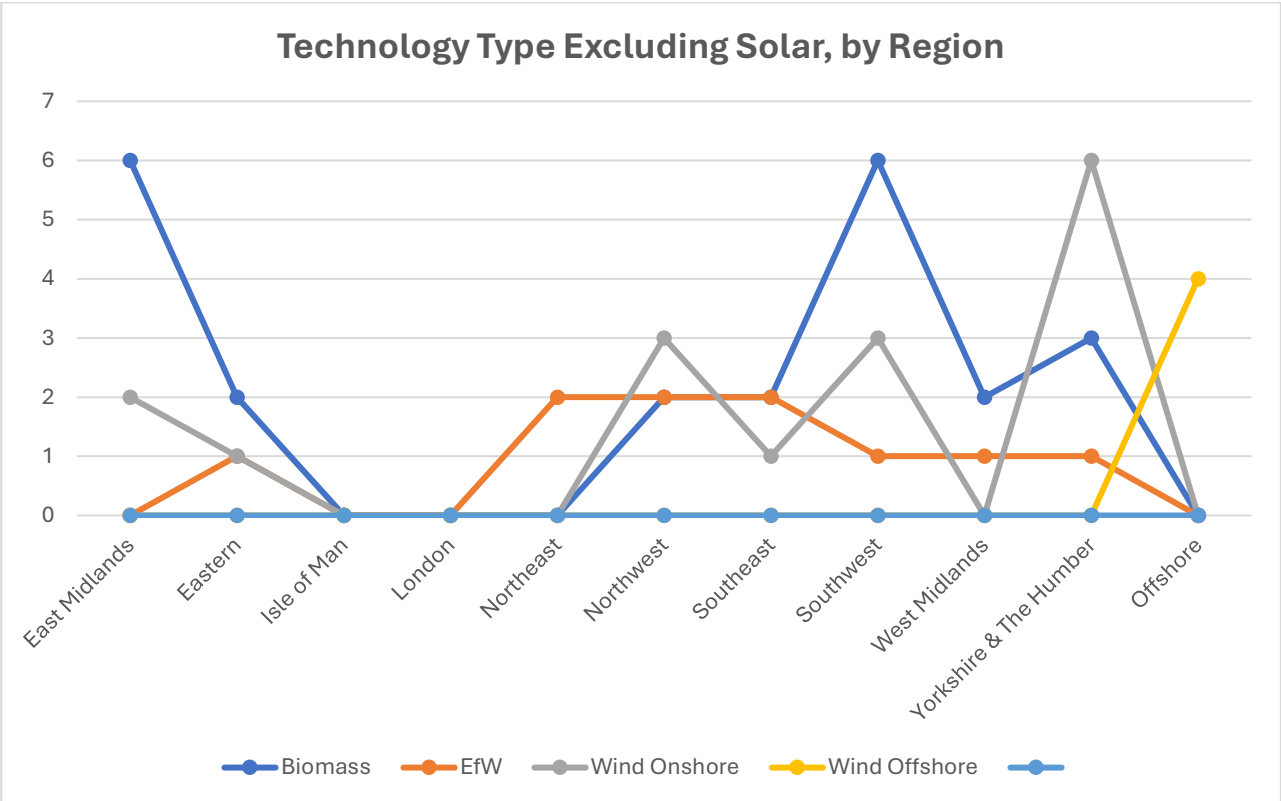

Figure 6 Technology Type Excluding Solar, By Region

Table 10 Technology Type and Development Status

Technology Type	Solar	EfW	Biomass	Wind Onshore	Wind Offshore	TOTAL
TOTAL	**446**	**11**	**23**	**16**	**4**	**500**
Application Submitted	62	4	1	4	2	**73**
Application Abandoned	1	0	0	0	0	**1**
Application Withdrawn	24	1	0	1	0	**26**
Application Refused	54	1	2	0	0	**57**
Permission Granted	74	1	7	4	0	**86**
Waiting/Under Construction; Operational	216	3	13	7	2	**241**
% Granted from Total	**58.00%**	**0.80%**	**4.00%**	**2.20%**	**0.40%**	**65.40%**
% Refused from Total	**10.80%**	**0.20%**	**0.40%**	**0.00%**	**0.00%**	**11.40%**

4.11 Heritage Assessments and Documentation

4.11.1 If heritage was mentioned in any of an application's assessments or reports, the application query for heritage consideration was marked as 'Y' (yes). Heritage was considered in 73% (n=363) of the sample size and not considered for 24% (n=118) of the sample size. 4% is NA. See Figure 7.

Heritage Considered	Number	Percentage
Yes	363	72.60%
No	118	23.40%
NA	19	4.00%
Total	500	100.00%

Figure 7 Heritage Consideration within Application Entries

4.11.2 In terms of understanding who (i.e., the heritage advisers or applicants) first identified heritage, this is complex and not always easy to identify, nor in some cases documented accurately. There are many situations that might make this unclear; below outlines a few examples:

- In pre-application, the LPA heritage adviser may note that little archaeological works have been undertaken in or near the site, but flags notably close heritage assets or prior finds.
- Correspondence between the LPA heritage adviser and applicant/consultant is not available, but some documentation might point to conversations/correspondence that indicates the LPA heritage adviser pointed to the potential of archaeological assets.
- The LPA heritage adviser lists various designated assets but not all.

- The applicant/consultant report submitted has identified several assets, but not all, which is then picked up by the LPA heritage adviser.

4.11.3 The way in which this was interpreted was at the discretion of the researcher, however the overarching concept was the first stakeholder to document heritage as a consideration.

4.11.4 Notably, as shown in Table 11, 34% of identifications came from the applicant or consultant, while 33% were raised by LPAs. This suggests that the role of LPA heritage advisers remain vital, but significant identification still rests with the applicant conducting efficient heritage assessments.

4.11.5 It is worth noting that 33% of applications could not be allocated to an identifier.

Table 11 Reviewing how heritage was identified

Heritage Identified by	Applicant/ Consultant	LPA	LPA and Historic England	NA	Total
App No.	171	163	2	164	500
Percentage	34.20%	32.60%	0.40%	32.80%	100%

4.11.6 After identifying the site as having potential for heritage, requests for heritage assessments would then follow. In this report, Desk-Based Assessments (DBAs), Heritage Statements (HS), Geophysics, and Environmental Impact Assessments (EIA)/Environmental Statements were all reviewed.

4.11.7 Table 12 outlines the different types of heritage assessments and their features (i.e., focus, when used, scope, outputs, level of intrusiveness, legal requirement).

4.11.8 Landscape Visual Impact Assessment (LVIA) analysis is not included in this report as it is not specifically a heritage assessment but rather a landscape one, although many LVIAs consider heritage.

Table 12 Comparison Table between Different Types of Non-Intrusive Heritage Assessments

FEATURE	DESK-BASED ASSESSMENT (DBA)	HERITAGE STATEMENT	GEOPHYSICAL ASSESSMENT	ENVIRONMENTAL IMPACT ASSESSMENT (EIA)/ENVIRONMENTAL STATEMENT (ES)
MAIN FOCUS	Gather existing info on archaeological/historic potential	Assess significance of specific heritage assets and impact	Detect subsurface archaeological features	Identify significant environmental effects across topics
WHEN USED	Early-stage to assess archaeological risk	When development affects known designated heritage assets (NPPF requirement)	After DBA suggests subsurface potential	Required for major developments under EIA Regs
SCOPE	Archaeology, historic buildings, landscapes (desk research)	Designated heritage assets (focused)	Subsurface archaeology (field survey)	Broad: heritage, ecology, traffic, hydrology, LVIA etc.
OUTPUT	Written report with risk/opportunity assessment	Statement of significance and impact justification	Field survey results showing anomalies	Full Environmental Statement (ES) including visualisations, outline evaluation and mitigation
LEVEL OF INTRUSIVENESS	Non-intrusive (desk-based), site visits	Non-intrusive (assessment/reporting), site visits	Non-intrusive (remote sensing)	Varies; mainly desktop, some surveys/site visits
LEGAL REQUIREMENT?	Sometimes requested by LPA (PPS5/NPPF-compliant)	Yes, when heritage assets are affected (NPPF para 207)	No (but often requested by LPA)	Yes (for Schedule 1 or 2 projects)

4.11.9 DBAs and Geophysics often precede or inform an EIA, as NPPF requirements are still valid when doing a TCPA EIA; Heritage Statements are legally mandated via the NPPF if there is any impact on designated assets. Meanwhile, EIAs are also a legal requirement of major developments and are broader, project-wide assessments that will assess heritage (usually forming a technical appendix of an EIA) considerations.

4.11.10 A *TCPA overview of the Planning Process and Assessment Flow* (Figure 8)is presented below. It also includes the pre-application stage. It is intended to highlight key relationships, outlined below:

- The DBA helps decide if Geophysics or further archaeological work needed.
- Heritage Statements are required independently for any potential impact on known designated heritage assets, most commonly listed buildings and/or conservation areas. These are sometimes mandated by local policy.
- Geophysics deepens archaeological understanding but does not replace the need for DBAs or Heritage Statements.
- EIAs are the umbrella document compiling LVIA, Cultural Heritage, Ecology, and so forth into one coordinated assessment.
- Intrusive archaeological assessment via trial trench evaluation can occur both as a pre-determination exercise (with or without with support from a DBA and/or geophysics) or a form of post-consent mitigation.
- Other forms of intrusive post-consent mitigation include archaeological monitoring and open area excavation.
- Non-intrusive mitigation, which can follow the results of previous non-intrusive and/or intrusive investigation are in the form of either/and preservation in situ, by removing direct impacts or by screening, which removes or reduces indirect impacts.

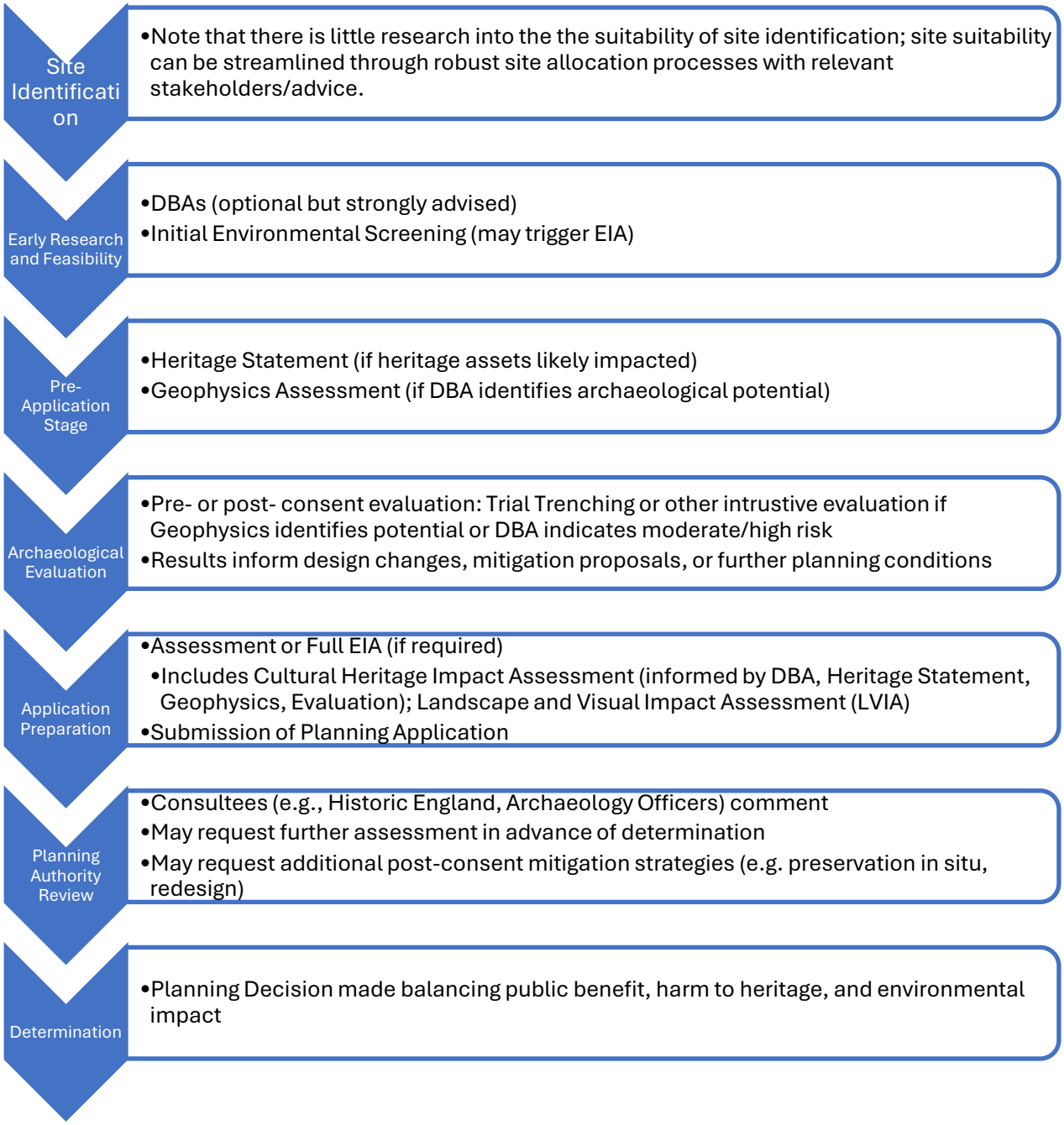

Figure 8 The Planning Process and Assessment Flow

4.11.11 Within the sample size, DBAs were present in 50.8% of cases; Geophysical surveys (37.8%) and Heritage Statements (20.8%) were also common. This is not unsurprising given the percentage of applications for solar sites, which are often located in large open fields, which have received little or no previous archaeological assessment.

4.11.12 Within the sample size, 24% did not have any form of heritage assessment.

4.11.13 Note that a single application may have more than one type of heritage assessment. This means that the percentages presented below will have a greater sum than 100%.

Table 13 Representation of Heritage Assessment Type

Type of Heritage Assessment	DBA	Heritage Statement	Geo-physical Survey	EIA	Evaluation	No assessments within a single app	NA for all assessments within a single app
App. No	254	104	189	95	94	120	43
Percentage	50.80%	20.80%	37.80%	19.00%	18.80%	24.00%	8.6%

4.12 Heritage Impacts and Advisory Responses

4.12.1 As mentioned earlier, this study defines "direct" impact as that which has or may have an immediate and obvious physical implication to a heritage asset (e.g., impact on below-ground archaeology caused by groundworks or impact on the fabric of historic buildings and structures). "Indirect" impact, for the purpose of this study, is that which affects or changes the setting, as in the way in which a heritage asset is experienced through the surroundings (e.g., changes in views and vistas, changes to how the physical surroundings might disrupt significance, and sensory experiences). Whilst culminative impacts can also alter setting over time, it is not considered within this study.

4.12.2 As shown in Table 14, a significant proportion of applications (39.6%) identified both direct and setting impacts, showing a nuanced understanding of impact pathways. Note that 38% of the 500 applications entries did not have enough information in the planning portals to make a further analysis.

4.12.3 If we are to review the below information *only using the sample size of applications that considered heritage* (n=363; see Figure 7), then the percentages becomes somewhat different, with 54% of all applications that considered heritage to have considered both direct and setting impact.

Table 14 Impact of Heritage Assets Identified

Impact of Heritage Assets Identified	Direct	Setting	Both	NA/ Unknown
App No.	57	53	198	192
Percentage	11.40%	10.60%	39.60%	38.40%

4.12.4 Table 15 shows that 64% of applications received a response from a LPA heritage adviser, whether an archaeologist or conservationist, and 28% from Historic England. Bear in mind that some LPAs only have one heritage adviser (either an archaeologist or conservationist, as titled) to cover the full range of heritage considerations.

4.12.5 Further interrogation presented in Table 16 shows regional patterns. The Eastern (n=62), South West (n= 68) and South East (n=48) regions show particularly strong engagement from the LPA heritage team. Equally, these regions also have the highest numbers of no response from the LPA heritage team. This may suggest they are low resourced as these regions also have some of the highest levels of application submissions (see Table 7 above).

4.12.6 Lower scores of responsiveness may also be due to a lack of proper documentation, and different means of communication that is not logged on portals. Nonetheless, from the sample size of 500 applications, there is a 24% non-response rate. Whilst it may suggest uneven heritage capacity, it can also be due to documentation.

Table 15 Responses from LPA Heritage Advisers and/or Historic England

Responses	LPA Archaeologist	LPA Conservationist	An LPA Heritage Adviser	Historic England
Y	290	178	321	138
N	145	253	119	300
Percentage (Y)	58.00%	35.60%	64.20%	27.60%

Table 16 Regional Responses from LPA Heritage Advisers and/or Historic England

Region	Response from LPA Team	Response from Historic England	No Response from LPA team	NA Response from LPA team
East Midlands	41	23	12	11
Eastern	62	25	21	5
London	1	0	1	0
North East	17	6	3	6
North West	12	3	10	9
Offshore	3	3	0	0
South East	48	13	17	7
South West	68	31	17	6
West Midlands	39	21	15	9
Yorkshire & Humber	29	13	23	0
Total Application	**320**	**138**	**119**	**53**
Percentage	63.40%	27.40%	23.80%	9.80%

4.12.7 Meanwhile, Historic England's response rate regionally is 28%, with high engagement in the South West (n=31), Eastern (n=25) and East Midlands (n=23) regions.

4.12.8 Historic England responses were also reviewed to better understand if they were responses that had no comment, no comment and then a referral back to LPA heritage advisers, comments with a referral, or substantive comments.

4.12.9 Table 17 presents, from a sample size of 138 (using the total responses from Historic England presented in the Table above), the majority of comments from Historic England are 'No Comments and Referral' (50%, n=68), followed by 'Substantive Comments' (35%, n=48) in which the representative offered detailed insights as to the heritage assets under consideration.

Table 17 Historic England Response Comments

Historic England Response	App No.	Percentage (n=138)
No Comment	2	1.46%
No Comment and Referral	68	49.64%
Comments and Referral	10	7.30%
Substantive	48	35.04%
Unknown	10	7.25%

4.12.10 It may be worth further interrogating the substantive comments to explore whether substantive comments and the content of their focus (e.g., is it to highlight an asset's significance, concern of impact, or provide advice when an LPA heritage adviser can or does not?). It is worth noting that of the 48 substantive comments, 30 had Scheduled Monuments.

4.12.11 The responses from LPA heritage advisers and/or Historic England are largely the stage of interest, because it is here where the nuanced approach to planning takes place. Understanding negotiations is largely based on how each party assesses impact of the identified heritage assets. The study, however, did not capture changes in levels of impact that might occur due to revisions or processes that are undocumented. It is also a high-level review, meaning that the analysis does not capture levels of impact across specific heritage assets: for example, if a site had five heritage assets of which one was assessed as having negligible/minor impact with three others as low/moderate and one as high, it was assessed within the 500 applications of the REPD as 'Negligible-High'. This, of course, loses the nuances of understanding impact, which can be explored in more focused and in-depth research if needed.

4.12.12 As indicated in Figure 9, applicants/consultants generally assessed impacts to heritage assets as either negligible and/or low. LPA heritage advisers were more likely to assign moderate or high impacts. This points to a frequent discrepancy between applicant and LPA perceptions of impact.

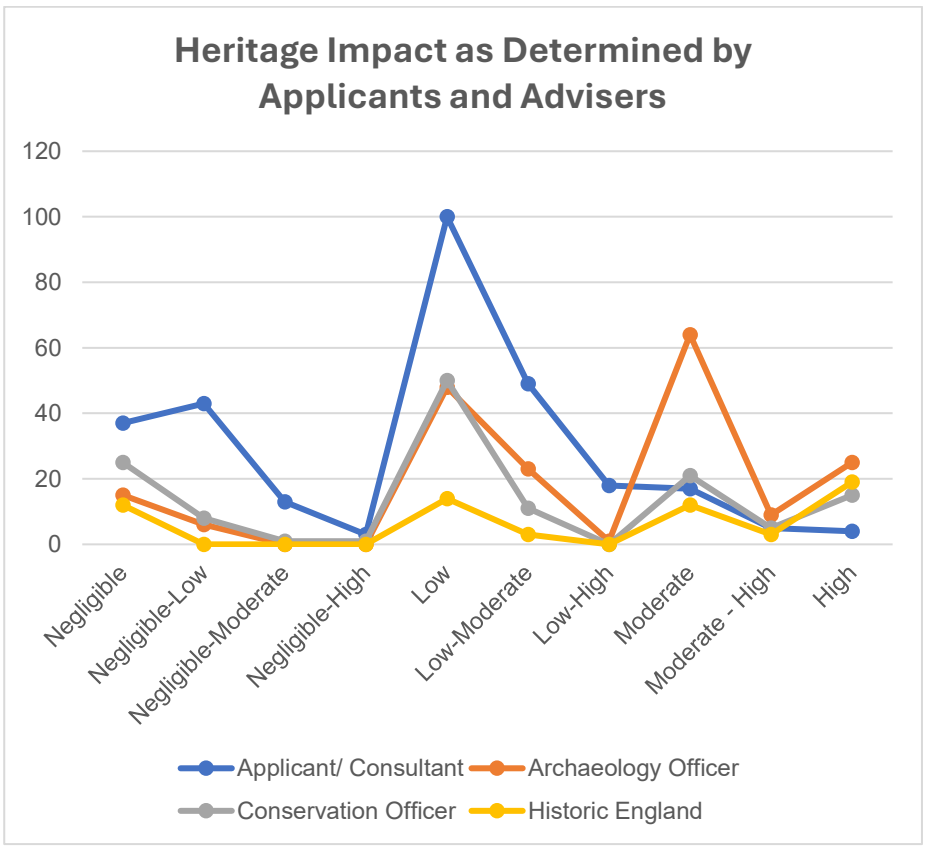

Figure 9 Heritage impact assessments as determined by applicants and advisers

4.12.13 Further analysis was undertaken to highlight when both applicant/consultant and LPA heritage adviser agreed on the level of impact across heritage impacts. Of 500, there were 140 cases in which the applicant/consultant and LPA heritage adviser agreed, 31 in which they did not, 1 in which there was agreement in some areas but not others, and 328 which could not be assessed.

4.12.14 Of the 140 in which there was agreement, it is important to highlight that some of these impacts were revised by either the applicant or LPA heritage adviser. For example, the heritage adviser may lower their impact assessment following further investigation.

4.12.15 Of the 31 cases with disagreement, the applicant assessed a lower impact than the LPA heritage adviser 26 times, and higher only four times.

4.12.16 In one case, the LPA heritage adviser agreed with large segments of the heritage assessment, but also raised areas in which they disagreed with the content of the assessment.

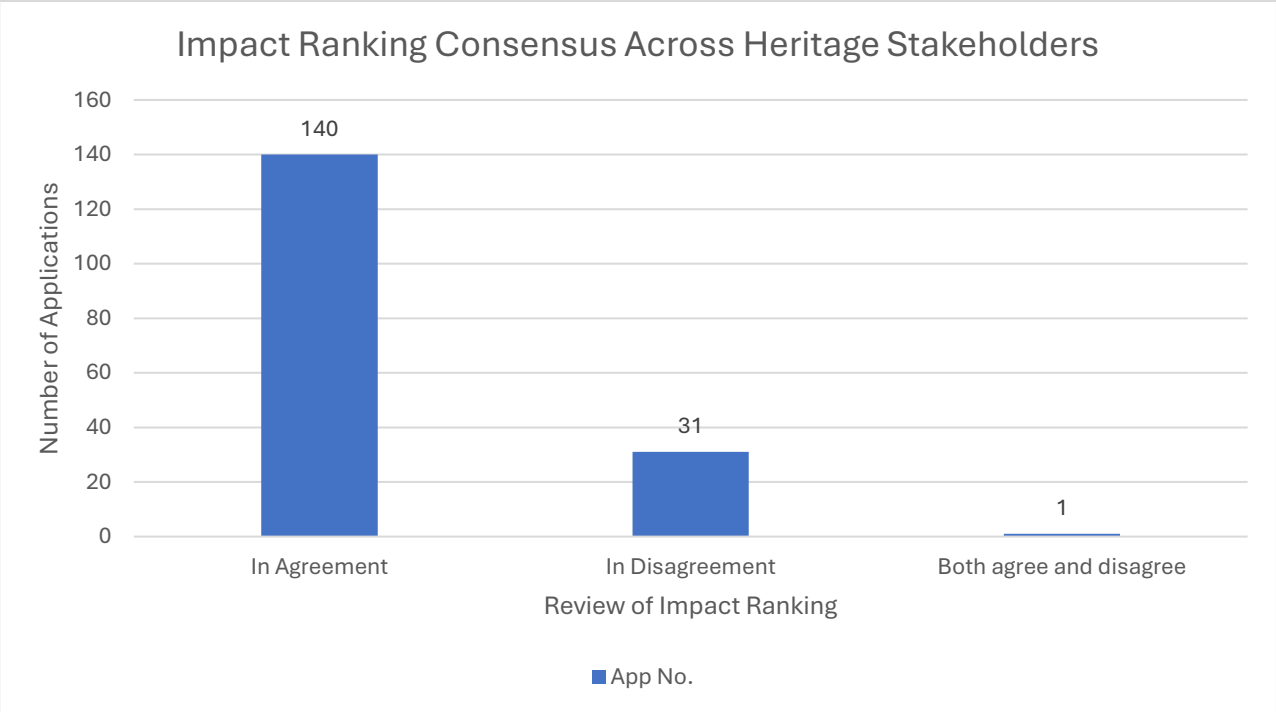

Figure 10 A Review of Impact Ranking Consensus

4.12.17 Based on the initial heritage assessments provided, LPA heritage advisers may then request further heritage assessment to better understand impact and significance, and did so in 25.20% of applications. For example, if a DBA was submitted, and there was correspondence in which the LPA heritage adviser then requested a geophysics survey, that would count as additional work. If a DBA and geophysics survey was submitted as a requested additional assessment, then additional work might include a request for evaluation (e.g., trial trenching).

4.12.18 The results presented in Table 18 present the application number and percentages of where more work was required by LPA heritage advisers, reflecting the iterative nature of planning and negotiation, and how heritage assessments can often be an incremental process depending on assessment findings.

Table 18 Findings on whether the LPA Heritage Adviser requested additional work

More Work Required	App No.	Percentage
Yes	126	25.20%

No	278	55.60%
Unknown	96	19.20%
Total	500	100.00%

4.13 Designated and Non-Designated Heritage Assets

4.13.1 When the heritage assessment process addressed heritage assets, these assets were further identified as either designated or non-designated. The assessment of designated and non-designated heritage assets individually occurred in 61% of applications. Where both were assessed together in an assessment this occurred in 56.4% of applications (Table 19).

4.13.2 As presented in Table 20, listed buildings (57%) and Scheduled monuments (28.2%) were the most common designations assessed in heritage assessments. Conservation Areas followed (25.2%), just 3% lower than Scheduled Monuments.

4.13.3 Registered Parks and Gardens (10.4%) had quite low representation. Of the 52 applications with Registered Parks and Gardens, The Gardens Trust consulted 12 times (23%), Historic England 31 times (60%). Other consultees included Norfolk's Archaeological Trust, the Wildlife Trust, National Trust, Heritage Lincolnshire, Somerset Garden Trust, and the Garden and Parks Trust.

Table 19 Assessment of Designated and Non-designated Heritage Assets

App considers	Designated	Non-Designated	Both
Y	305	304	282
N	60	62	42
NA	127	127	-

Table 20 Number and Percentage of Times of Designated Heritage Types

App includes Designated Asset	Listed Building	Scheduled Monument	Conservation Area	Registered Parks and Gardens	Registered Battlefield	WHS	Other
App No.	285	141	126	52	5	7	9
Percentage	57.00%	28.20%	25.20%	10.40%	1.00%	1.40%	1.80%

4.13.4 In the Table above, 'Other' accounts for Historic Hedgerows (n=4), Ancient Woodland (n=3) and Protected Wrecks (n=2), which were also documented, but not robustly thus not analysed as part of this study in enough detail to make any conclusive insights. NA accounted for 16% (n=79) of the results.

4.14 Consultation with the Public, Statutory and Non-Statutory Consultees

4.14.1 Where possible to identify, a note was made of groups that were consulted on applications with a heritage lens. Heritage groups or LPA consultees commented on 29% of the applications (n=145): Historic England responded on 27% of applications (n=139); The Gardens Trust, 3.6% (n=18); National Trust, 0.6% (n=3); and Woodland Trust 0.2% (n=1). It should be noted that this is not comprehensive as documenting this was often difficult (e.g., it would not be clear a response was provided other than a sentence hidden in a single documentation).

4.14.2 Other groups that provided consultation on applications include, but is not limited to: CADW; Norfolk's Archaeological Trust; The Wildlife Trust; Heritage Lincolnshire; Somerset Garden Trust; Garden and Parks Trust; North Devon Archaeological Society; Clwyd Powys Archaeological Trust;

Heritage Vision Ltd; Ham Conservation Group; SW Heritage Trust; Oxford Preservation Trust; Oxfordshire Architectural and Historic Society, and; The Victorian Society. This list is in no particular order.

4.14.3 What was apparent and loosely recorded was the rise in public comment on applications. The highest recorded reached 970 responses from the public on a single application, with an average of public comments at 34.9 per application. Note that this average was taken by using the highest and lowest number of public comments, and that not all applications had public comments submitted. It, however, may point to the results presented in Table 24 further below which highlights only 21% of refusals were based on LPA heritage advice. More work is needed to understand the relationship between public comment, heritage advice and decision outcomes.

4.14.4 It was notable that within public comments, substantial rationale for objection was related to setting and the location's characteristics, which – whilst landscape setting and heritage setting are different - overlaps strongly with heritage considerations. For example, comments might raise the characteristic of an area, whether historic or not, that would be impacted.

4.14.5 There is potentially a need to recognise that some regions/locations have planning applications for large solar farms, for example, that are adjacent to one another, and that decision-making guidelines rarely look at culminative effects of planning decisions on wider neighbourhoods and landscapes. Rather, discourse might focus on NIMBYism and a disconnect from local perceptions.

4.15 Heritage in Decisions and Conditions

4.15.1 Heritage was included in 35% of application Decision Notices, with 29% of those inclusions involving heritage-related conditions (Table 21 and Table 22). 23% was marked as NA, either not available, or not applicable (i.e., the application did not warrant heritage consideration).

Table 21 Heritage included in final application decision

Heritage in Decision	App No.	Percentage
Yes	174	34.80%
No	205	41.00%
Pending	4	0.80%
NA	117	23.40%
Total	500	100%

Table 22 Heritage as a Condition in Final Decisions

Heritage as a Condition in Decision	App No.	Percentage
Yes	143	28.60%
No	127	25.40%
Pending	4	0.80%
NA	226	45.20%
Total	500	100%

4.15.2 In terms of understanding how the heritage assessment process affects whether final decisions have a heritage-related condition or not, below (Table 23) presents the relationship between the

two. Notably, where evaluations have already taken place during the pre-determination phase, there is a low percentage (9%) of heritage thereafter being included in the final Decision Notice as a condition. Applications that have had additional work required by the LPA heritage adviser also have low levels of heritage being included as a condition in the final Decision Notice (13%). It is possible this is because heritage concerns would have already been addressed and so no conditions need be required.

4.15.3 In some instances, the request for more work pre-determination has also been offered as a post-determination condition, a result of discussion and negotiation between applicant and LPA heritage adviser.

Table 23 Level of Phased Work and Relationship with Final Decision Conditions

Applications w/ Phased Work & Conditions	DBA & Condition	Heritage Statement & Condition	DBA/ Geophysics & Condition	Evaluation & Condition	Further work required & Condition	Further work required & no Condition
App No.	119	22	80	47	63	12
Percentage	23.80%	4.40%	16.00%	9.40%	12.60%	2.40%

4.16 Refusals and Heritage Rationale for Refusal

4.16.1 Refusal Decision Notices are discussed earlier (see Section 4.8.1), and here explored as well. As shown in Table 24, of the 57 applications that were refused, 21% were through recommendations by LPA heritage advice (and in one case, with Historic England support); 49% of refused applications were not supported by LPA heritage advice for refusal. 30% of this analysis was marked as NA. This area must be explored further to understand how LPA heritage advice is being considered in final decisions.

It could be the case that Public Consultation discussed in Section 4.14 4.14 played a role in objection and refusal rationale. Again, whilst the documenting of this information was conducted loosely only to explore potential future research, it is clear the public played a large role in the rationale for refusal despite assessment and advice provided by consultees.

4.16.2 Table 25 shows that, of the 57 refused applications, where possible to identify, heritage was the primary reason for refusal in only four (7%), and amongst other reasons in 19 refusal decisions (33%). As NA is a significant percentage (60%), due to data not available, applicable or decisions pending, it is clear this area needs further study. It may point to heritage considerations rarely being the sole rationale behind refusal, but part of a combination of concerns regarding the proposal.

4.16.3 Of the 57, where possible to identify, the heritage reasoning was based on 'setting' impact for 20 applications (35%), 'direct' impact for three (5%), and in one case both direct impact and setting were part of refusal rational. NA is 60%, suggesting more work is needed.

Table 24 Refused Applications based on LPA Advice

Refusal based on LPA Advice	No.	Percentage against refused number (n=57)
Y	12	21.05%
N	28	49.12%

NA	17	29.82%

Table 25 Heritage Refusal Primary or Amongst Multiple Reasons

Rational for Refusal	No.	Percentage against refused app (n=57)
Contributory Reason	19	33.3%
Primary Reason	4	7.02%
NA	34	59.68%

4.17 Conditions for Preservation in Situ

4.17.1 For the 143 applications that had heritage in its Decision Notice as well as a planning condition, mitigation by record was most popular at 57%, followed by the use of both mitigation by record and preservation in situ (29%). Preservation in situ was requested in only 7% of conditions. This suggests that in many cases, mitigation via recording and/or excavation remains the go-to approach, possibly due to the cost of taking areas out of development versus the cost of excavation.

Table 26 Heritage Conditions for Preservation by Record and/or in Situ

Condition	Mitigation by Record	Preservation in situ	Both	NA
App No.	81	10	41	11
Percentage (n=143)	56.64%	6.99%	28.67%	7.7%

4.18 Policy References

4.18.1 Heritage references and conditions within the final Decision Notices were supported by citing planning policy by the LPA heritage team. The NPPF was cited in 52.3% of Decision Notices that mentioned heritage; Local Plans in 62%, and both in 37%. This demonstrates the joint role of national and local policy in heritage decision-making, with Local Policies the key documents referenced to support planning applications. Whether more consistent referencing would enhance transparency and accountability is worth consideration.

Table 27 Planning Policy Referencing in Heritage Section of Final Decision

Reference	NPPF	Local Plan	Both
App No.	91	108	65
Percentage*	52.30%	62.07%	37.36%

** Percentage is out of 174 applications, the total number of 'Heritage in Final Decision' findings (see* Table 21*)*

4.19 Nationally Significant Infrastructure Projects (NSIPS)

4.19.1 The research found that NSIPs relating to renewable energy development go into an impressive level of detail regarding the historic environment that, by comparison, TCPAs do not, as one would expect given the size, scale and complexity of NSIP applications. For example, an NSIP for an offshore windfarm in Dogger Bank (Planning Ref: EN 010125; planning status: granted; see case study) had substantial heritage assessment covering every designated heritage type in several chapters of the Environmental Statement, including *Onshore Archaeology and Cultural Heritage, Offshore Archaeology and Cultural Heritage,* and *Heritage Walkover Survey Report*. These supporting documents also considered non-designated assets in substantial depth, including a separate assessment of airborne remote sensing and satellite imagery data against historic map regression analysis, which are rarely considered in TCPA applications, let alone in such extensive detail.

4.19.2 Regarding offshore windfarm applications, the nature of the historic environment is very specific and unique from all other applications in that it deals with dynamic intertidal zones and marine archaeology. Therefore, the types of assessments are very different to the usual TCPA assessments. These may include a heavy focus on SONAR and paleoenvironmental data.

4.19.3 With offshore windfarms, the level of scrutiny on the natural environment is also far more in-depth largely due to dealing with biodiversity (e.g., seabirds, shellfish, fish habitats), protected marine landscapes and even shipping navigation routes and impact on aquacultural industries.

4.19.4 Through analysis of the documentation, it is very difficult to trace specific LPA heritage adviser and Historic England correspondence. Often the principle means of identifying historic environment advice/consultation is through the Statement of Common Ground (SOCG).

4.19.5 SOCGs, however, do not necessarily reveal the nuances of heritage considerations because they often record final consensus decisions. It does not necessarily document nor track, for instance, positions of heritage advisers alongside application positions and the negotiation process.

4.19.6 Over the analysis of NSIPs for this research, rarely, if ever, were the positions of heritage bodies (e.g., non-statutory) or comments from the public transparent. This is of concern as these are large and impactful projects. One NSIP rare example is the offshore windfarm in East Anglia (Planning Ref: EN 010078; planning status: granted) in which the Secretary of State noted in their Decision Letter:[11]

> *"Heritage impacts were frequently mentioned in Relevant Representations during the examination... and in representations made to the Secretary of State during the post-examination consultation periods. Relevant Representations were also received from owners of some of the listed buildings surrounding the substation site. Issues relating to the impact of the Proposed Development on cultural heritage were a recurring theme in the examination and were raised by many Interested Parties, both in writing and verbally at the examination hearings. Numerous concerns about the impacts caused by the Proposed Development, and the surveys and assessment conducted by the Applicant, were raised by the Substation Action Save East Suffolk, Historic England, the Parish Councils and by Suffolk County Council and East Suffolk Council in the Local Impact Report" [para 6.7].*

4.19.7 A notable discussion in the above NSIP, noted by the Examining Authority (ExA), was a paragraph highlighting the complexity of policy:

[11] See https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010078/EN010078-010064-EA2%20-%20Decision%20Letter%20Signed.pdf

The ExA noted that during the examination, there were several discussions about the policy environment... In particular, the differences between NPS EN-1 and the NPPF, and between NPS EN-1 and the NPSs which have been more recently updated.[12] *In the Applicant's response to the discussions, it noted that the NPPF does not contain specific polices for NSIPs—which are determined in accordance with the Planning Act 2008 and noted the differences in wording of the NPPF and NPS EN-1. The ExA agreed with the Applicant's reasoning and interpretation of the law. However, it also considered that the 'direction of travel' of policy including the later wording of the NPPF and the policy of 'great weight' to be important and relevant, noting the Barnwell decision*[13] *and the text of the more recently updated NPSs in this regard (Decision Letter, paragraph 6.3).*

4.19.8 For this particular NSIP, the Decision Letter also noted that,

Because of the existence of three relevant NPSs, NPS EN-1, NPS EN-3, and NPS EN-5, the Secretary of State is required to determine this application against section 104 of the Planning Act 2008. Section 104(2) requires the Secretary of State to have regard to:

- *any local impact report (within the meaning given by section 60(3)),*
- *any matters prescribed in relation to development of the description to which the application relates, and*
- *any other matters which the Secretary of State thinks are both important and relevant to the decision.*

[12] Such as the Airports NPS (2019) or the Geological Disposal Infrastructure NPS (2019)

[13] https://cornerstonebarristers.com/news/barnwell-manor-wind-energy-ltd-v-e.northants-dc-english-heritage-national-trust-ssclg/#:~:text=Northants%20DC%2C%20English%20Heritage%2C%20National%20Trust%20%26%20SSCLG,-18.02.2014&text=Court%20of%20Appeal%20rejects%20Barnwell,the%20setting%20of%20listed%20buildings.

5 Reflections

5.1 Contribution and Scope

5.1.1 The resulting report and analysed REPD of 500 applications, as a quick review, offers a structured and policy-relevant overview of how the historic environment is addressed across a broad spectrum of renewable energy applications. By triangulating DESNZ metadata with full-text planning documents and applying a consistent review framework, the study contributes to evidence-based discussions on heritage protection, planning policy implementation, and procedural transparency. While not designed to replace qualitative or ethnographic approaches, the method offers a replicable model for future high-level understandings of heritage considerations, and monitoring and policy evaluation, in the energy planning domain.

5.2 Understanding the Historic Environment in the Planning Process for Renewables

5.2.1 In review of the 500 applications, 11.40% (n=57) were refused with 5% (n=20) of that having heritage considerations amongst the reason for refusal. However, it is worth stressing that in using the DESNZ database categorisations or Decision Notices, often the nuanced approaches and discussions get lost in how we understand heritage considerations within the planning process. For example, for a particular application on a site with designated and non-designated heritage of importance in Warwickshire (Planning Reference W/22/1577; status: awaiting construction), the archaeology adviser (response, 5 Feb 2024) noted that further work would be needed to assess archaeological implications prior to determination, and had no intention to object nor refuse the application. However, they also added in their correspondence to the LPA planner:

> *If your Council is minded to refuse permission for this development on other planning grounds, and the applicants have not carried out an archaeological evaluation, we recommend that the absence of an evaluation and the possible adverse consequences of the development should be included as a reason for refusal, in order to ensure that the archaeological issues are given adequate consideration in any subsequent appeal.*

5.2.2 What is highlighted here is that schemes must be supported by sufficient information to enable a proper and detailed assessment of the potential impact the proposed scheme is likely to have on heritage of significance. It also highlights that heritage advisers might prepare a response for both approval and refusal, to provide flexible pathways for the historic environment to remain a consideration of any current or future decision.

5.2.3 Also demonstrated are the complexities of the UK planning process, and the ongoing changes to the various application and consenting processes.

5.2.4 The TCPA formalised a system in which planning decisions were made on a case-by-case basis, embedding flexibility and responsiveness while enabling public scrutiny. The model contrasts with more permissive regimes, by supporting deliberative democracy, balancing development pressures with long-term place-making objectives (Gallent et al. 2013).

5.2.5 The role of Statutory Consultees - such as Historic England, the Environment Agency, Natural England or The Gardens Trust (see Appendix 1 for list at time of writing) are central actors in ensuring planning decisions are done so with specialist advice in their independent capacity, with no ties to stakeholders involved in the application, so to integrate public values such as heritage, environmental protection, and infrastructure safety (Lord and Tewdwr-Jones 2014).

5.2.6 Their roles are embedded in law and designed to guarantee that specialist oversight on matters beyond the immediate purview of developers or local planning authorities. Their contributions help prevent long-term costs (e.g. flood risk, biodiversity loss) by ensuring informed, holistic decisions. Note that during time of writing, the UK Government is addressing the role of Statutory Consultees.

5.2.7 The UK's system is set up so that planning authorities can evaluate proposals in the context of local development plans and national policy, while also responding to site-specific factors, consultee insights, and public consultation. This ensures accountability and responsiveness. Perceived inefficiencies are often symptoms of under-resourcing rather than flaws in the system's democratic foundations.

5.2.8 As an example of site-specific factors, for example, a planning application submitted to Chelmsford City Council (ref. 21/00081/FUL; status: under construction) was met with objections from the Forestry Commission, The Gardens Trust, and the Woodland Trust in part due to the development's proximity to an ancient woodland and veteran trees, coupled with objections from the public. The Woodland Trust response noted Natural England and the Forestry Commission define ancient woodland 'as irreplaceable habitat which is important for its wildlife; soils; recreational value; cultural, historical and landscape value which has been wooded since at least 1600AD'. A buffer was imposed around the woodland in order to reduce visual and ecological impacts. Though termed a "blocker" by proponents, this delay protected a valuable habitat and led to enhanced environmental planning. In the Decision Notice, the reason for the buffer is stated as:

> *Reason: This information is required prior to commencement of the development, to agree the precise location and specification of the solar farm and to ensure the design of the development integrates with the character and appearance of the area and does not materially affect the living environments accordance with Policies DM19, DM23 and DM29 of the Chelmsford Local Plan.*

It is worth noting here that whilst ancient woodland are not considered part of the heritage remit per se, the DEFRA Policy Paper *Keepers of time: ancient and native woodland and trees policy in England* recognises ancient woodlands and ancient and veteran trees as 'exceptionally valuable' for their culture and heritage value and 'hold an important record of historic management practices' that often include 'valuable historic features'. As part of Section 8 on Protection of cultural heritage, it highlights the Government will (1) Promote good working practices and improve historic data resources to make sure valuable historic features are identified, protected and conserved; (2) encourage, where possible, the restoration of traditional management practices, such as coppicing and pollarding to conserve, restore and enhance landscape character.

Region	Offshore
Planning Authority	Secretary of State
Technology Type	Offshore Wind
Planning Status	Awaiting Construction

Case Study Highlight: *Understanding policy prioritisation for heritage in renewable development.*

Details

A 2019 NSIP planning application for the construction of an offshore wind farm of up to 75 turbines, generators and associated infrastructure, with an installed capacity of up to 900MW, located 37km from Lowestoft and 32km from Southwold was granted planning consent in 2022 by the Secretary of State (SoS). The proposal also included a significant land corridor route.

The proposal was submitted with a vast quantity of supporting historic environment documentation and research as part of the overarching Environmental Statement, including an archaeological desk-based assessment, a heritage statement, a geophysical survey and trial trench evaluation. In consultation, Historic England, the LPAs' archaeological advisers and Conservation Officers all responded, well within their allotted timeframes. All assessed potential

heritage was understood to impact heritage assets significantly more than the applicant's consultant had suggested.

During the examination period, issues relating to the impact of the proposed development on cultural heritage were a recurring theme in the examination and were raised by many interested parties, both in writing and verbally at the examination hearings. Numerous concerns about the impacts caused by the proposed development, and the surveys and assessment conducted by the applicant, were raised by SASES, Historic England, the Parish Councils and by the LPA Advisers. The applicant contested that impacts would be minor adverse or negligible. Through the Statement Of Common Ground discussions, eventually an Outline Written Scheme of Investigation was agreed on. However, setting impacts to a number of designated heritage assets were not agreed upon.

The Examining Authority (ExA) highlighted interpretation of policy as an issue, and which policies should take precedence. The vast majority of consultation responses justified their rationalise by referencing the NPPF. However, the applicant contented that NSIPs are determined under the 2008 Planning Act and not the NPPF. In particular, the different interpretation within NPS EN-1 (Overarching Energy) in its recognition and prioritisation of Government's commitment to transitioning to a low-carbon economy and its emphasis of the urgent need for new renewable infrastructure. As a result, the Order was granted.

It is therefore an important case to highlight the need for heritage advisers to fully understand NPSs, their implications and how, despite the planning balance, other policies may take precedence over NPPF regarding NSIPs and renewables.

Application in RAT Database:
Row: 8
Date: 2022
Planning App Ref: EN010078

5.3 Heritage Considerations as Planning Safeguards

5.3.1 This high-level report revealed that heritage considerations do not block planning decisions, and that for the majority of applications analysed, LPA heritage advisers' correspondence with applicants revealed advice is provided on a case-by-case basis to accommodate development needs where possible with an open and pragmatic approach. Indeed, safeguards within the planning system are critical if we are to recognise that planning decisions impact communities, including their lives, livelihoods, health and wellbeing, and resilience.

5.3.2 It is true that these safeguards can be perceived as frustrating - as "barriers" and/or "blockers" - often used to describe factors that delay or complicate development. While such terms may reflect the experiences of developers and delivery agencies, they are not neutral descriptors. Rather, they highlight underlying tensions between expediency and accountability in the planning process.

5.3.3 For developers, perceived barriers include regulatory requirements, multi-agency consultations, cost, and procedural delays. These are sometimes framed as inefficiencies, yet they often stem from the need for rigorous evaluation of potential impacts on communities, infrastructure, and the environment. High-quality development depends on such scrutiny to ensure alignment with strategic objectives and legal standards.

5.3.4 From a community standpoint, genuine barriers include limited access to information, technical documentation, and representation in planning decisions. When the system is under-resourced

or overly complex, these factors can disempower citizens, undermining the democratic ethos that the planning system is meant to uphold.

5.3.5 Local authorities and statutory consultees have a duty to help deliver requirements of the law, yet face their own systemic barriers, such as staff shortages and budget constraints. These impact the capacity for timely and thorough review of planning proposals, potentially leading to many of the findings in the previous chapter e.g., differentiations across regions, delayed responses and a diverse level of engagement across applications. These constraints may be addressed more thoroughly through greater resource provision rather than further deregulation.

5.3.6 Crucially, the dominant framing of environmental planning considerations as blockers to the UK Growth Agenda may misrepresent the planning system's purpose to deliver sustainable development. It shifts attention away from more substantive concerns voiced by developers, communities and/or consultees (e.g., the current state for national wired transmission and local distribution networks to deliver the growth of renewable energy generation needed; a shortage of skills (e.g., accredited professionals needed to deliver UK distribution networks and power lines; excavators for underground cabling and construction of substations; or the capacity issue of UK water waste infrastructure systems to accommodate new housing schemes).[14]

5.3.7 What the analysis has shown is that planning delays often arise from incomplete or poor-quality applications, legal ambiguities, or insufficient early-stage collaboration, rather than public interest protections.

5.3.8 To move forward, a recalibrated approach is needed - one that sees planning as an enabling governance mechanism rather than a barrier. This includes supporting effective engagement, building institutional capacity, and encouraging a shared understanding of planning as a process that balances growth with broader societal and environmental responsibilities.

5.3.9 An example of cross-sector coordination and statutory consultee engagement is a site within Shropshire (Planning Reference 21/01661/FUL; status: under construction). The archaeology adviser (response, 17 Sept 2021) referenced other heritage consultants, including the Conservation Officer and CADW in their response and their recommendation for an archaeological condition. Documentation demonstrated clear coordination across the three consultees, who all agreed sufficient information was provided regarding the setting of multiple designated heritage assets. They added the information satisfied the national and local planning policies, and that their response was with regard to balancing the increased need for renewable energy without compromising the visual impact within the wider historic landscape.

5.3.10 With the evolving policy landscape, it is worth emphasising the nuances that the UK planning process permits as part of maintaining and delivering democratic principles, but also highlights its current key challenges:

- Under-resourcing: Local authorities and consultees face staffing and funding shortages, affecting decision times.
- Narrative capture: Policy debates often conflate delays with public interest checks.
- Limited transparency: Community groups frequently lack tools or access to shape planning outcomes effectively.

5.4 Expediency and Safeguarding Heritage Assets through Adequate Assessment

5.4.1 Adequate assessments for heritage assets are an area of contention between LPA heritage advisers and those who develop and deliver the assessments. It is clear from the research that there may be misalignments in assessments regarding the level of significance of heritage assets as well as approach to mitigation or preservation.

[14] As highlighted by the National infrastructure Commission, the Public Accounts Committee and Anglian Water respectively.

5.4.2 Below provides examples taken from the DESNZ REPD sample of 500 entries only to highlight some of the situations that arise within the planning process for renewable energy development applications.

Table 28 Case Study: Issues regarding Insufficient Information for Assessment

Region	West Midlands
Planning Authority	Shropshire Council
Technology Type	Installation of ground mounted solar panels
Planning Status	Refused

Case Study Highlight: *Despite obtaining pre-application advice on heritage assets, the application had insufficient information regarding impact to heritage assets as well as a mitigation plan. Permission was refused, and heritage included in that refusal.*

Details

A 2023 planning application was submitted to the LPA in Shropshire for the installation of ground mounted solar panels at Cheswardine Hall Residential Home, a Grade II listed country house dated 1875. As detailed by the LPA Conservation Officer (response, 07 June 2023),

The Hall is set within an identified park [Historic Parks and Gardens] in Shropshire. There are a number of other buildings and structures within the park such as the stables with dovecote and clock tower, Garden Cottage and walled garden and associated structures (to the north of the Hall) and a boat house and Lodge (to the south of the Hall). Beyond the park there are other non-designated heritage assets such as Yew Tree Farm to the north and in the wider area there are other assets including; the Grade II Church of St Swithun, Cheswardine and associated Grade II structures, Cheswardine Castle and an associated linear bank Scheduled Monument, Cheswardine Conservation Area.*

The proposal was refused on two accounts:

> Insufficient information and no mitigation plan to fully assess the impact of the 600 mounted solar panels together with a container for the battery and inverter storage on the character and setting of Cheswardine Hall. Indeed, at pre-application stage, the development was proposed at a much smaller scale, and no further detail of design or scale had been submitted.
>
> Insufficient information regarding impact and mitigation approach to the ecology including potential detrimental impact on statutorily protected species or habitat.

It was thus deemed that the scheme was contrary to the requirements of the NPPF and local policies. Historic England had not been consulted (as it is not a requirement for a Grade II Listed Building. The Decision Notice stated that,

While there is no objection to the principle of the installation of solar panels, the scheme as submitted does not provide sufficient information to assess its impact on the character and setting of the historic landscape and building.

This case demonstrates that whilst both heritage and ecology were the main drivers for refusal, it is clear that their role to safeguard assets was justified.

Application in RAT Database:

Row: 353

Date: 2023

Planning App Ref: 23/01569/FUL

5.4.3 There is also legitimate concern and frustrations for all interested parties in terms of what is enough information to assess archaeology.

Region	South East
Planning Authority	Ashford Borough Council
Technology Type	Solar
Planning Status	Refused

Case Study Highlight: *Refusal based partially on insufficient information provided regarding the potential impacts of the development on heritage assets with archaeological interest despite providing multiple assessments on direct and indirect impacts.*

Details

This 2022 planning application was for the installation of a solar farm with a generating capacity of up to 49.9MW across 103.9 hectares of land comprising grazing pastures and arable land. The proposal put through comprised: ground mounted solar panels; access tracks; inverter/transformers; substation; storage, spare parts and welfare cabins; underground cables and conduits; perimeter fence; CCTV equipment; temporary construction compounds; and associated infrastructure and planting scheme. As such, it was subject to an Environmental Statement.

As part of the pre-application response, within 2km of the land area under consideration, there were two Scheduled Monuments, 106 Listed Buildings (4 Grade I, 9 grade II* and 93 Grade II), one Registered Park and Garden, and a Conservation Area.

Following the provided assessments, both Historic England and the LPA heritage adviser (Senior Archaeological Officer/Heritage Conservation) responded that both archaeological and built heritage aspects raised consistent concerns about the insufficient depth and scope of the submitted assessments. The Historic Environment Desk-Based Assessment (HEDBA, as named in the application) lacked thorough analysis of archaeological potential, omitting landscape-scale evaluation, and failing to interpret key data, including topography, superficial geology, and historic land use-all critical to assessing Early Prehistoric to Roman remains. They noted that the geophysical survey suggested potential ritual archaeology (e.g. ring ditches), but had not been verified through trial trenching. Simultaneously, Historic England found the visual assessment of impacts on designated heritage assets-such as the Grade I-listed Church of St Martin and Barrowhill's Scheduled barrow cemetery -to be incomplete, with weak viewpoints and reliance on wireframes that underplayed visibility and harm. Both heritage advisers called for additional work: field evaluation, landscape analysis, improved visualisations, and more robust interpretation to enable informed, policy-compliant decision-making under NPPF paragraph 194 and relevant legislation.

That said, neither heritage adviser recommended refusal; rather, Historic England cited 'concerns' and requested further assessment, including an impact assessment and 'clear, detailed proposal for mitigation'.

The Decision Notice (29 April 2024) noted refusal 'by reason of the insufficient information provided regarding the potential impacts of the development on the significance of heritage assets with archaeological interest, the development would be contrary…[to Local Policy and the NPPF]', and that it would cause less than substantial harm to designated heritage assets that had not been 'appropriately mitigated'.

This application is an example that in order for heritage advisers to make robust decisions around how a development might impact or harm heritage assets, it is essential to have an assessment and statement of significance that outlines both designated and non-designated heritage assets, as well as a clear approach for mitigation.

Application in RAT Database:

Row: 120
Date: 2022
Planning App Ref: 22/00668/AS

Region	South East
Planning Authority	South Oxfordshire Borough Council
Technology Type	Solar
Planning Status	Planning Application Submitted - Undecided

Case Study Highlight: *Multiple statutory and non-statutory consultees agreeing that the heritage assessments supporting the application are inadequate*.

Details
A 2022 planning application for the construction of a solar farm with a generating capacity of up to 49.9MW across 56.87 hectares of agricultural land. Pre-application was entered into, and advice noted within 2km of the development there were 119 Listed Buildings and three Conservation Areas; within 5km of the site, 11 Scheduled Monuments, and two Registered Parks and Gardens (RPG). Advice also pointed to the need to assess 'a significant number of non-designated features' and sites, including 'Iron Age Pits', an Iron Age and Romano-British Settlement, potential Earthworks and Quarries and so more. Pre-Application advice asked for a 'full Cultural Heritage Impact Assessment will be carried out in order to assess potential direct and indirect impacts resulting from development within the Proposed Development Site, including potential impacts upon hitherto-unknown sub-surface archaeology.' The LPA consulted Historic England, Oxford Preservation Trust, The Gardens Trust, Oxfordshire Architectural and Historical Society alongside the LPA Archaeologist and Conservation Officer.

An Environment Statement was produced which included a Cultural Heritage Chapter and Appendices with (1) Geophysical Survey Report, (2) Archaeological Evaluation Report. Following, the applicant produced an additional Heritage Addendum to 'provide further consideration of the proposed solar scheme…in relation to certain heritage assets following the receipt of consultation responses from a number of parties'. These parties included: Oxford Preservation Trust, Historic England, Oxfordshire Architectural and Historical Society, The Gardens Trust, Georgian Group, the Oxfordshire South Heritage Officer, Nuneham Courtenay Parish Council, and the Oxfordshire County Council Archaeologist. Their comments were grouped into five matters: under-estimation of harm to the RPG, no assessment of the Conservation Area, disagreement with level of harm attributed to a two Grade II Listed Buildings, RPG and Conservation Area, and disagreement over the significance of the archaeology and, therefore, the mitigation strategy.
These major concerns would, of course, have implications further down the development.

The decision is pending.

Application in RAT Database:
Row: 301
Date: 2024
Planning App Ref: P24/S1336/FUL

5.5 The Critical Role of Early Engagement and Pre-Application Advice

5.5.1 The data and case examples show how early engagement-including robust pre-application consultations-can help improve design proposals as well as align goals between development and historic safeguards whilst revisions are still optional. This in turn can help plan and understand the nature and complexity of selected sites for development.

5.5.2 However, it is clear from the analysis that processes are inconsistently applied and often under-resourced.

5.6 Variability in Heritage Advice, Engagement and Documentation Across Councils and Regions

5.6.1 There is significant variation in how LPAs identify and evaluate heritage concerns—some lack basic documentation, others demonstrate rigorous assessment. This affects outcomes, leads to confusion for applicants and creates spatial inequality in how the historic environment is protected.

5.6.2 A lack of national standardisation such as historic environment terminology (Desk Based Assessment (DBA), Heritage Impact Assessment (HIA), Cultural Heritage Impact Assessment (CHIA), Written Scheme of Investigation (WSI), Without Prejudice Written Scheme of Investigation (WPWSI), Updated Project Design (UPD), Post Excavation Assessment (PXA), Summary Report, Interim Report and Report also leads to confusion for applicants. A lack of standardised approach to trial trench evaluation in terms of what is evaluated (ie why evaluate pile locations as they cause minimal impact) and percentages of a site (ie, 5%, 2%, 1% etc) has also been cited as a significant concern by applicants.

Region	North West
Planning Authority	West Lancashire Borough Council
Technology Type	Wind Onshore
Planning Status	Planning Granted

Case Study Highlight: *Inconsistency of heritage considerations in planning applications*.

Details
This 2021 planning application was for the erection of a single wind turbine on agricultural land for the generation of renewable energy for onsite use.

The Planning Statement submitted with the application contained a section on 'Historic Environment', which provided a condensed assessment of the potential impact on *some* designated heritage assets within a 2km study area of the site. The section did *not* include Grade II Listed Buildings, of which there are a number within the immediate surroundings, but rather only assessed Grade II* and Grade I Listed Buildings. Grade II buildings are understood as buildings of *special* interest, warranting every effort for their preservation, and are protected under national legislation, the Listed Buildings and Conservations areas act 1990, not just local policy.
The Historic Environment section concluded there is negligible to minor impact to the local and wider historic landscape. In addition, the desk-based assessment for the historic environment within the planning statement failed to consider below-ground impacts.
Not only was the historic environment assessment lacking in terms of the designated and non-designated heritage assets assessed, but in addition, no heritage adviser was consulted as part of this application.

This example demonstrates the inconsistency of heritage consideration across regions and potential lack of engagement with heritage advisers, despite a development site having designated heritage assets that require consideration under national legislation and policy.

Application in RAT Database:
Row: 58
Date: 2020
Planning App Ref: 2020/0933/FUL

5.7 The Quiet Power of Negotiation in the Planning Process

5.7.1 Much of the assessment, mitigation, compromise, and adaptation happens outside the formal documentation trail—through email, meetings, and iterative revisions. These processes, though largely invisible, are fundamental to how planning decisions are made in practice.

Region	East Midlands
Planning Authority	Rushcliffe Council
Technology Type	Solar
Planning Status	Awaiting Construction

Case Study Highlight: *Archaeological adviser revised advice, demonstrating flexibility, for further archaeological works to be undertaken post-rather than pre-determination after discussion with the applicant's consultant.*

Details
A 2021 planning application for the erection, operation and decommissioning of a 60.94 hectare solar farm on agricultural land.

The Archaeological Officer advised that given the results of the submitted DBA and geophysical survey showing multi-phase occupation extending into part of the application site, additional information would be required to determine the archaeological potential. The Archaeological Officer recommended that a targeted trial trench evaluation based on the results of the geophysical survey be undertaken pre-determination. The Applicant's cultural heritage consultant liaised with the Archaeological Officer to discuss the works, which was then revised to a post-determination condition for trial trench evaluation agreed by both parties.

This demonstrates the role of engagement and flexibility that can be provided by LPA advisers, often overlooked in planning analyses.

Application in RAT Database:
Row: 114
Date: 2022
Planning App Ref: 22/00809/FUL

5.8 Ambiguity and Transparency in Decision-Making

5.8.1 Key heritage considerations often remain hidden or ambiguously referenced in decision notices. This makes it difficult to assess how public interest obligations are weighed and can undermine public trust in the process.

Region	West Midlands
Planning Authority	Shropshire Council
Technology Type	Solar
Planning Status	Awaiting Construction

Case Study Highlight: *Heritage Considerations of Designated Heritage Assets within Decisions.*

In 2022 an application was submitted for the construction of a solar farm in Shropshire, comprising 3,024 solar panels. The site lay within 1km of two Scheduled sections of Offa's Dyke. A Heritage Impact Assessment was submitted by the applicant along with an LVIA, which concluded that there would be a moderate to 'negative impact on the setting' of both Scheduled Monuments, but that this would be mitigated and that 'nature of solar parks is of a

temporary development and land use that is very low impact, 100% reversible and very rapidly removed with very little in the way of remediation works being required'.

Historic England highlighted the significance of the Scheduled Ancient Monument in its objection to the development,
Offa's Dyke is a nationally significant frontier work dating back to the early medieval period. It is considered to be the largest and most complete purpose-built earthwork of its type in the country. It survives well despite some localised reduction of the earthworks and the infilling of the ditch over time, and will retain evidence for the date and method of its construction. Additionally, it has continued to play a role in the development of England and Wales since… Whilst it is acknowledged that there will be no direct physical impact on designated archaeological sites, due to the nature of the topography, the proposed development would introduce an extensive, and highly visible, modern industrial element into the setting of the nationally significant Offa's Dyke. This change in the setting is detrimental to the understanding of the landscape in which the Dyke was constructed.

The LPA Archaeologist, too, objected, noting the less than substantial harm to two Scheduled Monuments. They, however, added (22 August 2022):
Notwithstanding this objection, if the decision taker is minded to approve the proposed development it is advised, in relation to [Local Plans] and Paragraph 199 of the NPPF, that a phased programme of archaeological work should secured by condition. This should consist of an initial field evaluation, comprising a geophysical survey and trial trenching exercise, followed by further mitigation as appropriate.

The planning application was granted without any conditions pertaining to heritage or mitigation concerning the impacts to heritage assets. This case highlights that despite sound reason for refusal on heritage grounds, heritage considerations are weighed across multiple other benefits of a development, and might not even feature in a Decision Notice let alone contribute as a barrier to a development.

Application in RAT Database:
Row: 275
Date: 2022
Planning App Ref: 22/03447/FUL

5.9 The Need for Better Integration Between Climate and Heritage Goals

5.9.1 Emerging planning frameworks and policy often pit decarbonisation against conservation. However, well-designed renewable infrastructure can align with heritage values if guided by proportionate assessment, heritage-led design, and local context. This integration needs clearer policy articulation and professional guidance.

5.9.2 Whilst renewable energy developments' principal aim is to meet the goals of Net Zero by providing clean energy, they may not necessarily in themselves be sustainable. In order for such developments to be an enabler of climate action more widely, they need to take other sustainability concerns into account. Since sustainable development is the means by which development can meet present needs without compromising future generations as set out in the NPPF, the historic environment performs a crucial role in achieving climate resilient futures.

5.10 Revisiting Policy Framing: From "Harm" to "Transformation"

5.10.1 Current policy often starts from a framework of minimising harm. A reframing toward "positive transformation" or "enhanced stewardship" could open space for more creative, win-win outcomes in renewable development.

5.10.2 As highlighted in many publications, including the Heritage Counts series by Historic England,[15] public engagement with, and public benefit from heritage remain key instruments in place making. In this regard renewable energy schemes are no different than any other type of development and can offer significant opportunities to engage with communities to reduce local opposition, provide/contribute to wider community benefits including education, and reframe archaeological investigation as a positive contribution to belongingness and a sense of place.

5.10.3 Whilst the research did not specifically focus on public engagement from archaeological work beyond public consultation, the research team did note a distinct lack of specific public engagement requirements within decisions.

5.11 Accountability in Data and Evidence

5.11.1 Gaps in documentation, unavailable consultee comments, or missing reports raise questions about procedural robustness. Standardising evidence requirements, prescriptive policy and improving access would strengthen trust and allow better policy evaluation.

Region	South West
Planning Authority	Wiltshire
Technology Type	Biomass (dedicated)
Planning Status	Awaiting Construction

Case Study Highlight: *Biomass (dedicated) renewable energy applications have very little information about heritage considerations and consultee comments, clearly indicating heritage is not a barrier to these developments in addition to potential gaps in documentation.*

This biomass (dedicated) application was one of the few of this technology type that considered heritage in the proposal, due to it requiring Listed Building consent. Wilbury House is an early 18th century Grade I listed country house situated within a Grade II Registered Park and Garden of approximately 140 hectares.

The proposal was for the installation of a Biomass boiler, wood chip store and buffer tank, and the rebuilding of chimney to accommodate flue liner. Historic England was one of the two consultees, however the planning portal shows no further documentation nor engagement.

Interestingly, the Heritage Statement submitted outlines the impact of a proposed swimming pool rather than the proposals submitted, but nonetheless provides detailed information regarding the heritage assets.

The proposal was granted with no issue, and no evidence (whether it occurred or not) of wider consultation with LPA heritage advisers.

Application in RAT Database:
Row: 262
Date: 2022

[15] See Heritage Counts website, https://historicengland.org.uk/research/heritage-counts/

5.12 Addressing Planning Efficiencies

5.12.1 There is a need to invest in planning system capacity and increase funding for local authorities and statutory consultees to ensure timely, high-quality assessments.

5.12.2 The data presented here took many months of gathering, often though planning portals that were slow, inefficient, inconsistent and difficult to navigate. Contact with planners and their advisors was equally difficult whether by email or telephone. Inefficient local authority procedures create a "back and forth" approach to planning, which can extend over many months. As local authority heritage advisors are advisors and not the decision makers, further delays can be caused in approving and discharging programmes of work. Therefore, whilst the planning system in England is not broken, as often cited, it is inefficient and duplicative. Additional resourcing can only be part of the solution. New technologies need to be explored further to improve efficiency and consistency.

5.12.3 The heritage sector has a role to play to help reframe public interest protections and advocate for national policy to rearticulate statutory engagement and consultation as essential to democratic planning.

5.12.4 The heritage sector can help promote early collaboration through advice/guidance to encourage applicants to engage statutory consultees and communities at the pre-application stage to reduce delays later in the process.

6 Future Research

This research highlighted potential areas for future research interest that is provided below.

1 Site Allocation: It is clear that a main issue in relation to planning applications is site location. However, it is unclear how site allocations within local plans are identified or allocated in relation to renewables. It would be useful to better understand planning status against site allocation within local and/or development plans, and whether applications are then compliant with those site allocation policies. It would also be useful to better understand to what extent site allocations are supported by heritage evidence, and whether Historic England was involved in this process.

2 Renewable energy spatial strategy: Whilst policy and guidance has been developed in relation to renewable energy in England and we can observe a clear geographical distinction between energy types, more work is needed to identify and understand national renewable energy spatial strategies and how they are incorporated in boarder land use strategies such as housing and agriculture.

3 Safeguards: Safeguards in planning is an essential aspect of ensuring that diverse interests are embedded into decision-making. However, it is clear that efficiency is being hindered by resource limitations and capacity. It is not easy for LPA advisers to make sound decisions that impact the historic environment within approximately four months, especially if that decision is based on reviewing and reading large amounts of materials (e.g. reports). It would be useful to do deep dives into how, or if, efficiency can be streamlined in a way that does not jeopardise the natural and historic environment.

4 Planning Efficiency: As noted, whilst the planning system in England provides a case-by-case holistic approach to planning and decision making, planning has significantly grown since the 1990 Town and Country Planning Act and the introduction of the NSIP process via the 2008 Planning Act. The volume of planning applications and the complexity of the planning system have increased, reflecting a greater focus on development, housing, and infrastructure. Future research needs to explore leveraging digital tools and data to improve efficiency, accessibility, and decision-making in land use and development. This includes using AI to unlock historic planning data, creating user-friendly digital interfaces for public engagement, and adopting modular, open, and flexible software solutions. The goal needs to create a more streamlined, data-driven, and responsive planning process and work needs to be undertaken to better understand how heritage would fit into this emerging model.

5 Renewable Energy Types: The size of renewable energy developments (e.g., solar farms) vary and some applications can be more complex than others. There is a need to better understand the relationships between different types of applications including site identification, development size, and how that might impact the assessment and decision process. It is important to understand the cumulative impact of planning decisions from more than one planning application (inter) on neighbourhoods and landscapes, which at present there is no guidance for. Equally it is important to fully consider the cumulative in internal effects from a single development (intra).

6 Transparency in Decision-Making: Assessment requests (access to documents) and the framing of decisions vary across regions and Local Authorities, making it not only difficult for developers to anticipate requests/recommendations, but also may contribute to a lack of transparency in decision-making. It would be useful to better understand how decisions reflect consultees' input through improved transparency, accessibility and by utilising existing heritage values' language advocated by Conservation Principles.

7 Perceptions of Heritage: Because heritage includes setting and the character of a place, it can easily be blamed for refusals despite LPA heritage experts not necessarily recommending refusal nor objection. Often, members of the public, or a Parish, or other groups, might refer to heritage, setting,

cultural character and so forth because these things are of value to members of the public and wider communities. It would be useful to understand how we build on these values, which are so important to the sector as a whole, without becoming a scapegoat for the underlying issues of efficacy facing the planning system.

8 **Pre and Post Determination:** Clearly there is a tension between the work that needs to be done before a decision is made, and the investment of time and cost into conducting assessments without reassurance of an application being granted. This leads to a developer being responsible for ensuring that a site is appropriate for development before getting permission to develop. The argument for post-determination is now becoming increasingly in demand to avoid paying fees and investing time, however there are questions regarding to what extent safeguarding mechanisms can maintain their efficacy after the fact. More research is needed to better understand the co-benefits and trade-offs between pre- and post-determination decisions in relation to the historic environment.

9 **Ambiguity with Levels of Harm:** The distinction between 'substantial harm' and 'less than substantial harm' is often subjective with a range in interpretation leading to inconsistency in planning outcomes. Often less than substantial harm is referred to on a sliding scale, when in fact no such scale exists. This lack of clear thresholds with no strict definition nor quantitative measure makes it prone to, for example, downplaying impact in assessments to strategically frame it as more acceptable for development, even when the cumulative or physical/setting harm may be significant, or weighing against public benefits when other benefits are claimed. Courts have confirmed that even "less than substantial" harm must be given considerable importance and weight, but this is often misunderstood or underapplied at local decision levels. It would be useful to better understand how planning authorities and inspectors interpret and apply the concepts of substantial and less than substantial harm in practice, especially within the context of Critical National Priority (CPN) of the EN-1 Policy and what are the implications for heritage protection and planning outcomes? Given the ambiguity of levels of harm and the failure to allow subjective assessment, it would also be useful to explore how such scale might be guided and implemented.

10 **The Expertise Paradox:** The relationship between Local Planning Authority (LPA) heritage advisers and heritage consultants reveals an emerging Expertise Paradox within the planning system. Both groups possess deep knowledge of the historic environment and planning policy, yet tensions arise over the interpretation of significance and the contribution that setting makes to it, the necessity of mitigation, and the design of development proposals. These tensions are becoming more visible as external pressures—such as the cost-of-living crisis, inflation, the government's growth agenda, and post-COVID recovery demands—intensify the need for expedited development. LPA advisers are required to safeguard the public interest and uphold local and national heritage policies within often resource-constrained environments. In contrast, consultants, acting on behalf of applicants, are tasked with negotiating outcomes that enable development while demonstrating compliance. This dynamic leads to divergent views on what constitutes appropriate heritage mitigation, risk management, and acceptable harm, revealing underlying conflicts between public sector duties and private sector pragmatism. More research is needed on understanding how tensions between LPA heritage advisers and consultants affect the interpretation and negotiation of heritage mitigation measures in planning decisions, and what the broader implications are for protecting the historic environment under increasing economic and political pressures.

11 **Policy Clarity:** Within the policy environment, policy updates relevant to climate change (e.g. renewable energy) is happening at pace, which leads to potential contradiction or confusion across Frameworks, policies and guidance.

12 **Public Engagement:** As observed previously, there was lack of requirement for public benefit to be delivered from archaeological work as part of the decisions making process. Since archaeology is undertaken with the planning system because it is embedded as a public value, more study is needed to better understand why public engagement is not embedded into conditions, beyond the

publication of grey literature. Work is needed to explore what levels of public engagement have taken place on these schemes and what challenges and opportunities they have provided.

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8 Appendix 1: List of Statutory Consultees in England

8.1 Statutory Consultees related to the Historic Environment, at time of writing

8.1.1 Below is set out a full list of official statutory consultees for the historic environment in England:

- Historic England
- Theatres Trust
- The Gardens Trust
- Marine Management Organisation
- The National Amenities Societies:
  - The Ancient Monuments Society (now operating under the name *Historic Buildings & Places*)
  - The Council for British Archaeology
  - The Georgian Group
  - The Victorian Society
  - The Twentieth Society
  - The Society for the Protection of Ancient Buildings

9 Appendix 2: Methods and Methodology

9.1 Research Aims and Objectives [Questions]

9.1.1 The Research Questions that were agreed in the *Brief* provided by Historic England are summarised below and have subsequently been divided into four broad groups:

9.1.2 Analysis of 500 applications responds to the below questions:

1. **Planning Application Information**
    a. Of the applications studied what proportion were NSIPs/TCPA?
    b. Was pre-application sought and did this raise any heritage issues? (Government is now placing greater emphasis on 'front loading' the process including direct pre-app consultation between applicant and LPA advisor, but also in terms of scoping exercises and Preliminary Environmental Impact Reports to speed up the respective processes).

2. **Heritage Identification**
    a. Were there heritage assets to consider within the application?
    b. In what proportion of applications was a heritage interest identified?
    c. Were heritage assets identified and considered as part of the application (e.g. does it include heritage statement; is there designated heritage within EIAs or DBAs)?
    d. Are any non-designated heritage assets identified and, if so, at what stage of the application?
    e. Was heritage interest identified by the applicant or the local authority?
    f. Where a heritage interest was identified what was the nature of that interest (e.g. direct impact)? Did that interest affect designated assets?

3. **Consultation and Assessment**
    a. Is there a consultation response from a local authority heritage advisor and/or Historic England; have they been considered with reference to the NPPF, National Policy Statement (NPS) or local plan?)?
    b. What was the level of impact assessment by both the LPA advisers and applicants?
    c. Were statutory consultees consulted in line with national guidance?
    d. If consulted did Historic England provide substantive comments or was a "no comment" letter issued?
    e. Did advice from Historic England and or the LPA archaeological adviser (where advice was issued) reflect advice given by LPA conservation staff, or was there a conflict? If so, what was this conflict?

4. **Decision**
    a. Where proposals had a heritage interest was that identified as a reason for objection (e.g. by Historic England or local authority specialist)? In what proportion of applications?
    b. In what proportion of applications did heritage matters constitute reasons for refusal? This should also include analysis of Secretary of State decisions.

c. Where heritage matters constituted a reason for refusal, were they based on objections, or comments/advice, from Historic England and/or LPA conservation staff?

d. Where heritage objections were made, what proportion were related to below ground impacts versus setting impacts.

9.2 Methods and Methodology

9.2.1 This study aimed to examine how the historic environment is addressed within the planning system in England for renewable energy developments. The research draws on the analysis of 500 applications selected from the Department for Energy Security and Net Zero (DESNZ) Renewable Energy Planning Database, supplemented with planning documentation sourced from local authority portals. The methodology was designed to balance breadth of coverage with sufficient detail to evaluate heritage-related considerations across a representative sample of planning applications.

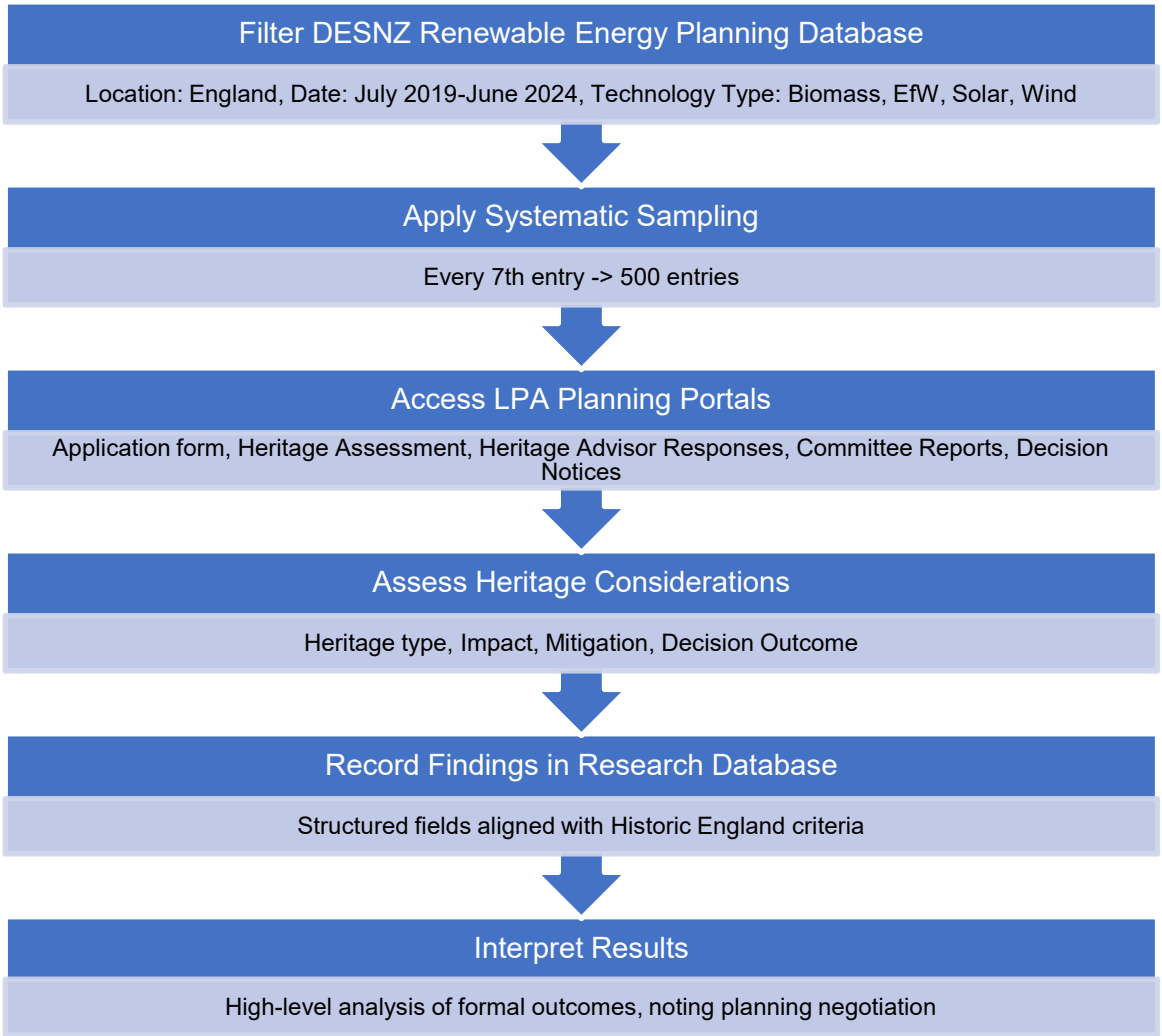

Figure 11 Project Stages

9.3 Dataset and Sample Selection

9.3.1 The initial dataset was drawn from the DESNZ Renewable Energy Planning Database January 2025 V1, which includes planning application data for energy infrastructure across the UK. Note that Technology Types include the following (highlights filtered for this report):

Table 29 Technology Types in initial DESNZ dataset

Advanced Conversation Technologies	Compressed Air Energy Storage	Geothermal	Liquid Air Energy Storage	Solar Photovoltaics
Air Source Heat Pumps	EfW Incineration	Hot Dry Rocks (HDR)	Pumped Storage Hydroelectricity	Tidal Lagoon
Anaerobic Digestion	Flywheels	Hydrogen	Sewage Sludge Digestion	Tidal Stream
Battery	Fuel Cell (Hydrogen	Landfill Gas	Shoreline Wave	Wind Offshore and Onshore
Biomass (co-firing and dedicated)	Gas Boiler	Large Hydro	Small Hydro	Unknown

9.3.2 The selected technology types represent 51% (n=8,724 of 17,135) of the renewable technology types across the entire UK. Selected entries for applications in England only, account for 47% of the 17,135 entries.

9.3.3 To focus the analysis on recent and policy-relevant cases, we applied filters based on location (England only), date range (July 2019 to June 2024), and technology type. The selected technologies—biomass, energy from waste (EfW) incineration, solar farms, and onshore and offshore wind—were chosen for their relevance to contemporary planning challenges and their varying physical and spatial impacts on the historic environment.

9.3.4 To manage the size of the dataset and ensure a representative sample, a systematic sampling method was employed. Specifically, every seventh application from the filtered list was selected, yielding a final sample of approximately 500 planning applications. This approach provided a geographically and technologically diverse dataset suitable for comparative analysis, while remaining practical for in-depth document review.

9.3.5 Note that in the Results chapter, percentages represent that of the entire sampling size (n=500) unless otherwise indicated within the Paragraph and/or visual (table or figure). **Furthermore, some percentages may not be representative if large proportions of the response analysis to the query was not available (NA) or could not be answered.** For example, a query with a large proportion of NAs or Unknowns will ultimately skew some of the findings.

9.3.6 NAs or Unknowns were marked in the dataset analysis when information could not be found to adequately substantiate the claim.

9.3.7 After analysing the first 60 applications, the initial dataset was revisited, this time filtering out applications for solar photovoltaic panels. This decision was made as of solar photovoltaics, roofs with solar panels make up approximately 60% of application entries, and tend not to consider heritage as part of receiving planning consent. Of the 500 entries we would have assessed, solar roofs would amount to 295.

9.3.8 Of the unfiltered database of 17,135 entries discussed in Paragraph 9.3.2, Solar Roofs account for 39% of the solar photovoltaics (total of recorded roofs, ground, ground & roof, and floating = 5,571).

9.3.9 Of the filtered entries (n=3,252), solar roofs accounted for 62% as shown in Figure 12.

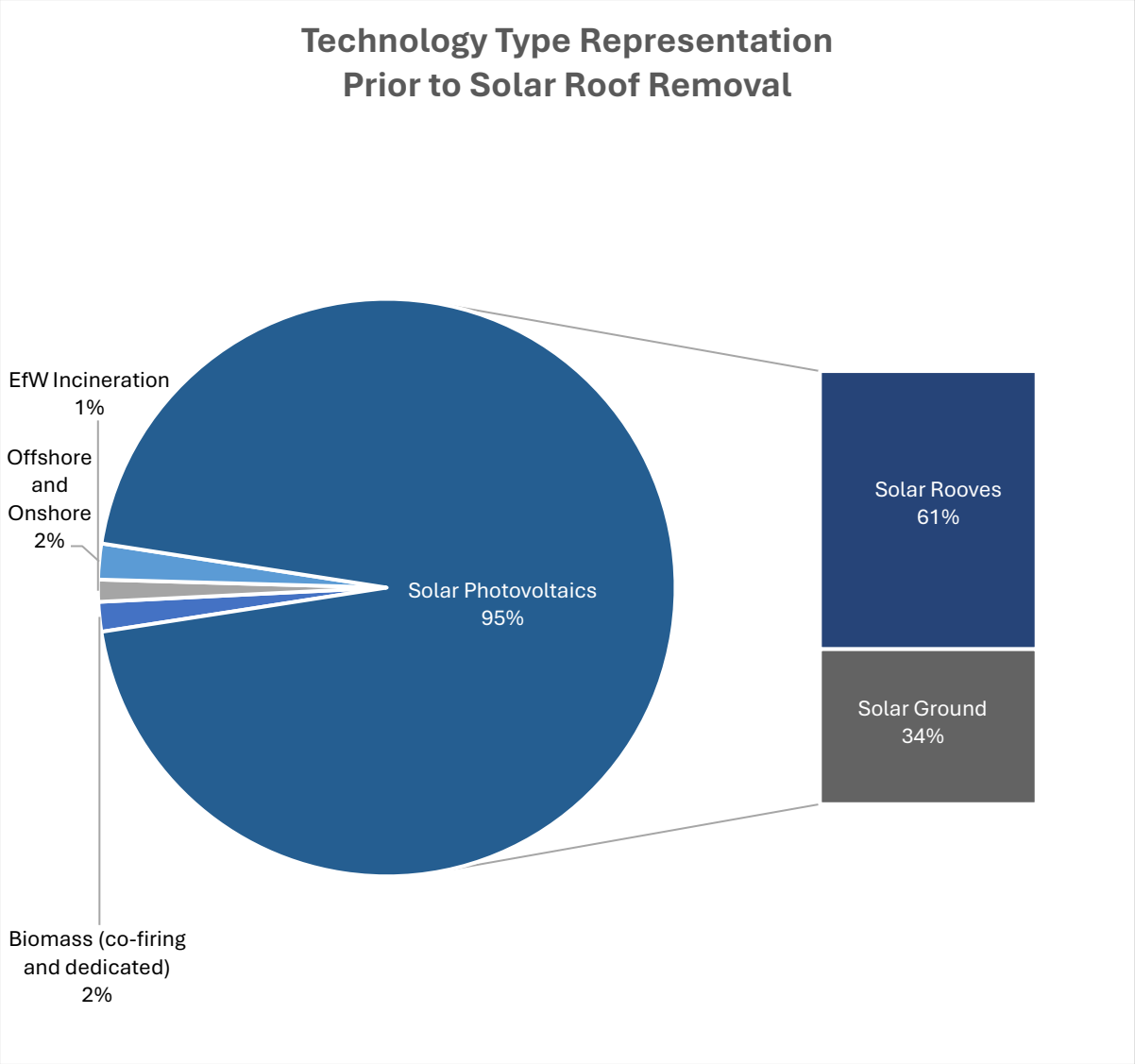

Figure 12 Representation of Solar Roofs Prior to Removal. n= 3,252

9.3.10 It was felt that this would not provide the necessary insights sought through this research. After filtering out solar roof entries, and keeping solar photovoltaics that are *ground, ground & roof,* or *floating,* the same process as above was carried out (i.e. selecting every 7th entry).

9.4 Document Retrieval and Review

9.4.1 While the DESNZ database contains useful metadata and summaries, it does not include detailed planning documentation. Therefore, each sampled application was cross-referenced with its respective LPA. Planning applications were accessed manually via LPA planning portals, using application reference numbers or site information provided in the database. Where available, a comprehensive set of documents was reviewed for each case.

9.4.2 Priority was given to documents directly addressing the historic environment and the planning balance. These included:

- Application forms
- Heritage statements or assessments
- Planning officer or committee reports
- Decision notices

- Statutory consultee responses, particularly from Historic England or LPA archaeology/conservation officers

9.4.3 Each case was examined against a structured framework based on Historic England's published guidance and criteria. This included assessment of whether a heritage assessment was present, how significance and setting were defined, whether harm was acknowledged and to what degree, what mitigation or design changes were proposed, and how heritage considerations were weighed in the decision-making process.

10 Appendix 3: The 2021 Report Quick Reference Table

IDENTIFIERS										
Project Name	The Heritage Dimension of Commercial Renewable Energy Development in Planning Research Project									
Data Source	BEIS Renewable Energy Planning Database (June 2020)									
Authors	Hana Morel PhD & Daniel Phillips ACIFA									
Selection Range	2015-2019			Total No. Entries after filters	458					
HERITAGE IDENTIFICATION										
% of Application Considering Heritage	62%			Heritage Identified by	Contractor	LPA Team	Historic England			
				App No.	50%	6%	1%			
HERITAGE IMPACT										
Type of Assessments (%) (*these may overlap*)					Heritage Impact of Proposal	No Change	Low	Medium	High	
DBA	Heritage Statement	Geophysics Survey	LVIA	EIA	Contractor	5%	22%	5%	2%	
44%	10%	18%	47%	16%	LPA Heritage Team	5%	14%	12%	10%	
Heritage Asset Considered (%)					Nature of Impact Assessed (%)					
Designated	Undesignated	Both Considered			Direct	Setting	Both Considered			
55%	51%	45%			6%	11%	28%			
CONSULTATION										
Known Responses from LPA Heritage Team/Historic England					Heritage Put Forward as Objection or Included in Refusal Notice					
LPA Team	Historic England				Heritage as Objection	Heritage as Refusal				
50%	25%				7%	5%				
Application w/ Designated Assets	Listed Building	Scheduled Monument	Conservation Area	Registered Parks and Garden	Registered Battlefield	WHS				
App No.	51%	31%	26%	10%	1%	2%				
DECISION										
Application Status					Heritage in Approved Decision and/or as Condition					
Approved	Refused				Included	Excluded				
61%	17%				29%	40%				

** The above percentages are derived from the total number of applications (n=458) and thus should be considered as a minimum due to the high percentages of applications marked as 'NA'.*

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