EAST PARK ENERGY

East Park Energy

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Environmental Statement
Volume 1 – Main Report

Chapter 6: Cultural Heritage and Archaeology

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Environmental Statement
Volume 1 – Main Report

Chapter 6: Cultural Heritage and Archaeology

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6.0 CULTURAL HERITAGE AND ARCHAEOLOGY

6.1 Introduction

6.1.1 This chapter of the Environmental Statement (ES) presents the findings of an assessment of the likely significant effects of the Scheme upon archaeological and cultural heritage assets. This includes direct effects resulting from the construction of Scheme, and effects upon the setting of heritage assets which may arise during the construction, operation and decommissioning of the Scheme.

6.1.2 This chapter is supported by the following appendices in **ES Volume 2: [EN010141/DR/6.2]**:

- **ES Vol 2 Appendix 6-1: Gazetteer of Heritage Assets and Events [EN010141/DR/6.2]**;
- **ES Vol 2 Appendix 6-2: Desk-Based Assessment [EN010141/DR/6.2]**;
- **ES Vol 2 Appendix 6-3: Photographic Record [EN010141/DR/6.2]**;
- **ES Vol 2 Appendix 6-4: Settings Impact Assessment [EN010141/DR/6.2]**;
- **ES Vol 2 Appendix 6-5: Archaeological Geophysical Survey Report [EN010141/DR/6.2]**;
- **ES Vol 2 Appendix 6-6: Site A Trial Trench Evaluation Interim Report [EN010141/DR/6.2]**;
- **ES Vol 2 Appendix 6-7: Site B Trial Trench Evaluation Interim Report [EN010141/DR/6.2]**;
- **ES Vol 2 Appendix 6-8: Site C Trial Trench Evaluation Final Report [EN010141/DR/6.2]**; and
- **ES Vol 2 Appendix 6-9: Site D Trial Trench Evaluation Interim Report [EN010141/DR/6.2]**.

6.1.3 This chapter is supported by the following figures in **ES Volume 3 [EN010141/DR/6.3]**:

- **ES Vol 3 Figure 6-1: Non-Designated Assets within 1km of Site A [EN010141/DR/6.3]**;
- **ES Vol 3 Figure 6-2: Non-Designated Assets within 1km of Site B [EN010141/DR/6.3]**;
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- **ES Vol 3 Figure 6-13: Designated and selected Non-Designated Heritage Assets within 3km of southern part of Grid Connection with the screened ZTVs [EN010141/DR/6.3]**;

- **ES Vol 3 Figure 6-14: Extract from a map by Saxton, 1583 [EN010141/DR/6.3]**;
- **ES Vol 3 Figure 6-15: Extract from a map of Bedfordshire by Blaeu, 1662 [EN010141/DR/6.3]**;
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- **ES Vol 3 Figure 6-36: Field IDs within Sites C and D [EN010141/DR/6.3]**.

Statement of Competence

6.1.4 This assessment has been undertaken by AOC Archaeology Group; a Registered Organisation of the Chartered Institute for Archaeologists (CIfA). This status ensures that there is regular monitoring and approval by external peers of our internal systems, standards, and skills development.

6.1.5 This assessment has been undertaken and overseen by competent experts with extensive experience of undertaking archaeological environmental impact assessment (EIA) for a wide variety of proposals including energy, residential, industrial (including extractive), commercial and recreational proposals.

6.1.6 AOC Archaeology Group conforms to the standards of professional conduct outlined in the CIfA Code of Conduct[1], the CIfA Standard and Guidance for Historic Environment Desk Based Assessment[2] and the CIfA Standard and

Guidance for Commissioning Work or Providing Consultancy Advice on the Historic Environment[3] and all other relevant CIfA standards and guidance.

6.1.7 AOC is ISO 9001:2015 accredited, in recognition of the Company's Quality Management System.

6.2 Legislation, Policy and Guidance

Legislation

6.2.1 Statutory protection for listed buildings is provided by the Planning (Listed Building and Conservation Areas) Act 1990, and for scheduled monuments by the Ancient Monuments and Archaeological Areas Act 1979. Legislation relating to Battlefields and registered parks and gardens is also provided by the Historic Buildings and Ancient Monuments Act 1953. The Levelling Up and Regeneration Act 2023, included further provision for designated heritage assets including scheduled monuments, listed buildings and registered parks and gardens.

Policy

National Policy

6.2.2 The following National Policy Statements (NPS) set out national planning policies in relation to nationally significant solar photovoltaic generation developments:

- Overarching NPS for Energy (EN-1)[4];
- NPS for Renewable Energy Infrastructure (EN-3)[5]; and
- NPS for Electricity Networks Infrastructure (EN-5) [6]

6.2.3 The National Planning Policy Framework (NPPF)[7], and the accompanying online Planning Practice Guidance (PPG)[8] are also important and relevant considerations.

6.2.4 Relevant national policies from the above documents are summarised in Table 6.1.

Table 6.1: Summary of National Planning Policy

Document	Policy / Paragraph Reference	Summary of Policy / Paragraph	Where addressed in the ES?
NPS EN-1	Paragraph 5.9.7	The Secretary of State should also consider the impacts on other non-designated heritage assets (as identified either through the development plan making process by plan-making bodies, including 'local listing', or through the application, examination and decision making process). This is on the basis of clear evidence that such heritage assets have a significance that merits consideration in that process, even though those assets are of lesser significance than designated heritage assets.	The potential for impacts upon non-designated heritage assets has been assessed. Paragraphs 6.4.5 to 6.4.6 to and Table 6.5 of this chapter present the methodology and approach to determining significance of heritage assets (including non-designated assets). The identified and potential non-designated heritage assets which may be subject to direct and indirect impacts are presented in Section 3 of **ES Vol 2 Appendix 6-2 [EN010141/DR/6.2]** and Tables 6.9 to 6.15 of this chapter. The embedded mitigation in relation to direct or indirect impacts is largely related to the design avoiding known heritage assets (or via proposed 'no dig solutions' within defined of Areas of Archaeological Constraint – AACs), as is presented in Section 6.7 of this chapter and in the **outline Archaeological Mitigation Strategy (oAMS) [EN010141/DR/7.15]**. A balanced approach to mitigation strategies for the identified direct and indirect impacts upon heritage assets which cannot be avoided by design is presented in Section 6.9 of this chapter and in the **oAMS [EN010141/DR/7.15]**. The non-designated heritage assets which have been assessed for potential settings impacts are

Document	Policy / Paragraph Reference	Summary of Policy / Paragraph	Where addressed in the ES?
			presented in Paragraph 1.2.9 of **ES Vol 2 Appendix 6-4 [EN010141/DR/6.2]** and Para 6.6.71 of this chapter.
	Paragraph 5.9.8	Impacts on heritage assets specific to types of infrastructure are included in the technology specific NPSs.	Summary of the policies within NPS EN-3 (relating to renewable energy infrastructure) are included in this table, below.
	Paragraph 5.9.9	States that the Applicant '*should undertake an assessment of any likely significant heritage impacts of the proposed development as part of the EIA, and describe these along with how the mitigation hierarchy has been applied in the ES.* *'This should include consideration of heritage assets above, at, and below the surface of the ground. Consideration will also need to be given to the possible impacts, including cumulative, on the wider historic environment.* *'The assessment should include reference to any historic landscape or seascape character assessment and associated studies as a means of assessing impacts relevant to the proposed project'.*	The Applicant has assessed the likely effects of the Scheme within Section 6.8 of this chapter. The embedded mitigation in relation to direct or indirect impacts is largely related to the design avoiding known heritage assets (or via proposed 'no dig solutions' within defined of Areas of Archaeological Constraint – AACs), as is presented in Section 6.7 of this chapter with further detail within the **oAMS [EN010141/DR/7.15].** The recommended mitigation strategies for the identified direct and indirect impacts upon heritage assets is presented in Section 6.9 of this chapter and the **oAMS [EN010141/DR/7.15]**. The assessment of potential setting effects has considered all locally listed buildings within 1km, all designated assets within 3km and selected designated assets beyond 3km as agreed via scoping consultation with Historic England, Bedford Borough Historic Environment Team (BBHET) and

Document	Policy / Paragraph Reference	Summary of Policy / Paragraph	Where addressed in the ES?
			Cambridgeshire Historic Environment Team (CHET). Selected non-designated assets were also scoped in to the assessment of potential setting effects as agreed via consultation with BBHET and CHET. The baseline for settings assessment is presented in Section 1.2 of **ES Vol 2 Appendix 6-4 [EN010141/DR/6.2]** and paras 6.6.60 to 6.6.71 of this chapter. The assessment of potential settings effects has identified a significant adverse (in EIA terms) effect upon the setting of the non-designated possible moated site (Asset 407) within the north-western corner of Site D as is presented in Section 3 of **ES Vol 2 Appendix 6-4 [EN010141/DR/6.2]** and in Paragraphs 6.8.64 and 6.8.65 of this chapter. Neither the Bedford Borough Historic Environment Record (BBHER) nor the Cambridgeshire Historic Environment Record (CHER) were able to provide Historic Landscape Characterisation (HLC) data as Bedford Borough confirmed that they do not hold the data and Cambridgeshire note that the data is not suitable to be provided. Further discussion with BBHET has confirmed that the potential for impact on the historic landscape can be undertaken as part of the settings impact assessments of the designated assets as considered within their landscapes, and by a map

Document	Policy / Paragraph Reference	Summary of Policy / Paragraph	Where addressed in the ES?
			regression assessment which is presented within section 3.3 of **ES Vol 2 Appendix 6-2 [EN010141/DR/6.2]**. The assessment of cumulative effects is undertaken as part of **ES Vol 1 Chapter 17: Cumulative and In-Combination Effects [EN010141/DR/6.1]**.
	Paragraph 5.9.10	*'As part of the ES the applicant should provide a description of the significance of the heritage assets affected by the proposed development, including any contribution made by their setting. The level of detail should be proportionate to the importance of the heritage assets and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum, the applicant should have consulted the relevant Historic Environment Record… and assessed the heritage assets themselves using expertise where necessary according to the proposed development's impact.'*	The Applicant has described the significance of heritage assets that will be impacted by the Scheme. Paragraphs 6.4.5 to 6.4.6 and Table 6.5 of this chapter present the methodology and approach to determining significance of heritage assets (including non-designated assets) and Paragraph 6.4.2 sets out the data sources that were consulted including the BBHER and CHER. Descriptions of all heritage assets identified within the study areas is included within **ES Vol 2 Appendix 6-1 [EN010141/DR/6.2]** with further discussion of the identified heritage baseline (formed by these assets) presented in Section 3 of **ES Vol 2 Appendix 6-2 [EN010141/DR/6.2]**. The identified and potential non-designated heritage assets which may be subject to direct and indirect impacts are presented in Section 3 of **ES Vol 2 Appendix 6-2 [EN010141/DR/6.2]** and Tables 6.8 to 6.14 of this chapter.

Document	Policy / Paragraph Reference	Summary of Policy / Paragraph	Where addressed in the ES?
			Paragraphs 6.4.7 to 6.4.14 and Table 6.6 of this chapter present the methodology and approach to establishing the relative sensitivity of a heritage asset to changes in its setting. The assessment of potential setting effects includes descriptions of the significance of the settings of the heritage assets as is presented in Table 1.0 of **ES Vol 2 Appendix 6-4 [EN010141/DR/6.2]**.
	Paragraph 5.9.11	*'Where a site on which development is proposed includes, or the available evidence suggests it has the potential to include, heritage assets with an archaeological interest, the applicant should carry out appropriate desk-based assessment and, where such desk-based research is insufficient to properly assess the interest, a field evaluation. Where proposed development will affect the setting of a heritage asset, accurate representative visualisations may be necessary to explain the impact '.*	The Applicant has produced a desk-based assessment (inclusive of the results of a walkover survey) outlining the archaeological baseline which forms **ES Vol 2 Appendix 6-2 [EN010141/DR/6.2]** and a detailed assessment of settings effects which forms **ES Vol 2 Appendix 6-4 [EN010141/DR/6.2].** Archaeological geophysical survey and field evaluation has been undertaken across the Scheme with their results presented in reports which form **ES Vol 2 Appendix 6-5 to Appendix 6-9 [EN010141/DR/6.2]**. The recommended mitigation strategies for the identified direct and indirect impacts upon heritage assets is presented in Section 6.9 of this chapter and the **oAMS [EN010141/DR/7.15].** The assessment of potential settings effects has identified a significant adverse (in EIA terms) effect upon the setting of the non-designated

Document	Policy / Paragraph Reference	Summary of Policy / Paragraph	Where addressed in the ES?
			possible moated site (Asset 407) within the north-western corner of Site D as is presented in Section 3 of **ES Vol 2 Appendix 6-4 [EN010141/DR/6.2]** and in Paragraphs 6.8.64 and 6.8.65 of this chapter.
	Paragraph 5.9.12	*'The applicant should ensure that the extent of the impact of the proposed development on the significance of any heritage assets affected can be adequately understood from the application and supporting documents. Studies will be required on those heritage assets affected by noise, vibration, light and indirect impacts, the extent and detail of these studies will be proportionate to the significance of the heritage assets affected.'*	The Applicant has assessed the extent of the impact of the development within this chapter with cross-reference to supporting appendices. The settings assessment has been in part informed by review of the zones of theoretical visibility (ZTVs) and visualisations produced as part of **ES Vol 1 Chapter 5: Landscape and Visual [EN010141/DR/6.1]**. The assessment of direct and indirect impacts has been, in part, informed by **ES Vol 1 Chapter 8: Hydrology [EN010153/DR/6.1]** which includes details of the lack of anticipated significant impacts upon groundwater and the proposed drainage strategy mitigating against the potential for run-off and scour. It was not considered likely that noise, vibration, or light would result in likely significant effects to any assets identified within the study areas with the levels of direct, indirect and visual impacts on setting representing the worst case in terms of levels of potential impact.

Document	Policy / Paragraph Reference	Summary of Policy / Paragraph	Where addressed in the ES?
	Paragraph 5.9.13	*'The applicant is encouraged, where opportunities exist, to prepare proposals which can make a positive contribution to the historic environment, and to consider how their scheme takes account of the significance of heritage assets affected…'*	The Applicant has considered how the Scheme accounts for the significance of the heritage assets affected. This is shown by how the incorporated mitigation includes measures to avoid known heritage assets, as is presented in Section 6.7 of this chapter with further detail within the **oAMS [EN010141/DR/7.15]**. The completion of the recommended mitigation works as is presented in Section 6.9 of this chapter and the **outline Archaeological Mitigation Strategy (oAMS) [EN010141/DR/7.15]** would provide for an opportunity to enhance our understanding of any buried remains encountered. An **outline Heritage Enhancement Strategy (oHES) [EN010141/DR/7.16]** has also been produced which contains recommended measures for making a positive contribution to the historic environment. These measures are also outlined in Paragraphs 6.7.33 to 6.7.36 of this chapter.
	Paragraph 5.9.14	*'Careful consideration in preparing the scheme will be required on whether the impacts on the historic environment will be direct or indirect, temporary, or permanent'.*	The Applicant has considered whether impacts upon the historic environment will be direct, indirect, temporary or permanent. Direct (which would also be permanent) and indirect impacts are presented in

Document	Policy / Paragraph Reference	Summary of Policy / Paragraph	Where addressed in the ES?
			Tables 6.9 to 6.15 of this chapter. The potential for temporary impacts on the historic environment (related to construction phase effects upon setting) is presented in Section 3.1 of **ES Vol 2 Appendix 6-4 [EN010141/DR/6.2]** and Paragraphs 6.8.51 to 6.8.57 of this chapter. The assessment of potential settings effects has identified a significant adverse (in EIA terms) effect upon the setting of the non-designated possible moated site (Asset 407) within the north-western corner of Site D as is presented in Section 3 of **ES Vol 2 Appendix 6-4 [EN010141/DR/6.2]** and in Paragraphs 6.8.64 and 6.8.65 of this chapter.
	Paragraph 5.9.15	*'Applicants should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.'*	The Applicant has considered whether there are opportunities for enhancing or better revealing the significance of heritage assets. These opportunities are presented within the **oHES [EN010141/DR/7.16]** and outlined in Paragraphs 6.7.33 to 6.7.36 of this chapter. The Site is not located within the extent of any conservation areas or world heritage sites.

Document	Policy / Paragraph Reference	Summary of Policy / Paragraph	Where addressed in the ES?
	Paragraph 5.9.16	With regard to mitigation, the NPS states: *"A documentary record of our past is not as valuable as retaining the heritage asset, and therefore the ability to record evidence of the asset should not be a factor in deciding whether such loss should be permitted, and whether or not consent should be given'.*	The Applicant has avoided, where possible, direct and indirect impacts upon identified heritage assets allowing for them to continue to be '*preserved in situ'* within identified AACs which are presented in the **outline Archaeological Mitigation Strategy (oAMS) [EN010141/DR/7.15]** and Section 6.7 of this chapter.
	Paragraph 5.9.17	*'Where the loss of the whole or part of a heritage asset's significance is justified the Secretary of State will require the applicant to record and advance understanding of the significance of the heritage asset before it is lost (wholly or in part). The extent of the requirement should be proportionate to the asset's importance and the significance and the impact. The applicant should be required to publish this evidence and to deposit copies of the reports with the relevant Historic Environmental Record. They should also be required to deposit the archive generated in a local museum or other*	The Applicant has avoided, where possible, direct and indirect impacts upon identified heritage assets allowing for them to continue to be '*preserved in situ'* within identified AACs which are presented in the **oAMS [EN010141/DR/7.15]** and Section 6.7 of this chapter. The identified and potential non-designated heritage assets which may be subject to direct and indirect impacts are presented in Section 3 of **ES Vol 2 Appendix 6-2 [EN010141/DR/6.2]** and Tables 6.9 to 6.15 of this chapter. The recommended mitigation strategies for the identified direct and indirect impacts upon heritage assets is presented in Section 6.9 of this chapter and the **oAMS [EN010141/DR/7.15]**. Both the **oAMS [EN010141/DR/7.15]** and any future written scheme of investigation (WSI) produced

Document	Policy / Paragraph Reference	Summary of Policy / Paragraph	Where addressed in the ES?
		public repository willing to receive it.'	and agreed with HE, BBHET and CHET in relation to the proposed mitigation works would include a requirement for the deposition of the results with the Historic Environment Record (both BBHER and CHER) and a suitable archiving strategy.
	Paragraph 5.9.19	*'Where the loss of significance of any heritage asset has been justified by the applicant on the merits of the new development and the significance of the asset in question, the Secretary of State should consider:* *• imposing a requirement in the Development Consent Order* *• requiring the applicant to enter into an obligation.*	The Applicant has identified a significant adverse (in EIA terms) effect upon the setting of the non-designated possible moated site (Asset 407) within the north-western corner of Site D as is presented in Section 3 of **ES Vol 2 Appendix 6-4 [EN010141/DR/6.2]** and in Paragraphs 6.8.64 and 6.8.65 of this chapter. The Applicant has recommended a mitigation strategy related to the potential for direct and indirect impacts on potential archaeological remains as is presented in the Section 6.9 of this chapter and the **oAMS [EN010141/DR/7.15]**. The **oAMS [EN010141/DR/7.15]** is secured by a Requirement in the **draft DCO [EN010141/DR/3.1]**.
	Paragraph 5.9.21	Notes that *'Where there is a high probability (based on an adequate assessment) that a development site may include, as yet undiscovered heritage assets with archaeological interest' there will be a consideration of*	The Applicant has recommended a mitigation strategy related to the potential for direct and indirect impacts on potential archaeological remains as is presented in Section 6.9 of this chapter and the **oAMS [EN010141/DR/7.15]**.

Document	Policy / Paragraph Reference	Summary of Policy / Paragraph	Where addressed in the ES?
		requirements to 'ensure appropriate procedures are in place for the identification and treatment of such assets discovered during construction'.	
	Paragraph 5.9.22	*In determining applications, the Secretary of State should seek to identify and assess the particular significance of any heritage asset that may be affected by the proposed development, including by development affecting the setting of a heritage asset (including assets whose setting may be affected by the proposed development), taking account of:* • *relevant information provided with the application and, where applicable,* • *relevant information submitted during the examination of the application* • *any designation records, including those on the National Heritage List for England…* • *historic landscape character records*	The Applicant has described the significance of heritage assets that will be impacted by the Scheme. Paragraphs 6.4.5 to 6.4.6 and Table 6.5 of this chapter present the methodology and approach to determining significance of heritage assets (including non-designated assets) and Paragraph 6.4.2 sets out the data sources that were consulted including the BBHER and CHER. Paragraphs 6.4.7 to 6.4.14 and Table 6.6 of this chapter present the methodology and approach to for establishing the relative sensitivity of a heritage asset to changes to its setting. The assessment of potential setting effects includes descriptions of the significance of the settings of the heritage assets as is presented in Table 1 of **ES Vol 2 Appendix 6-4 [EN010141/DR/6.2]**.

Document	Policy / Paragraph Reference	Summary of Policy / Paragraph	Where addressed in the ES?
		• *the relevant Historic Environment Record(s), and similar sources of information* • *representations made by interested parties during the examination process* • *expert advice, where appropriate, and when the need to understand the significance of the heritage asset demands it*	
	Paragraph 5.9.24	*In considering the impact of a proposed development on any heritage assets, the Secretary of State should consider the particular nature of the significance of the heritage assets and the value that they hold for this and future generations. This understanding should be used to avoid or minimise conflict between their conservation and any aspect of the proposal.*	The Applicant has described the significance of heritage assets that will be impacted by the Scheme. Paragraphs 6.4.5 to 6.4.6 and Table 6.5 of the Scheme present the methodology and approach to determining significance of heritage assets (including non-designated assets) and Paragraph 6.4.2 sets out the data sources that were consulted including the BBHER and CHER. The Applicant has identified a significant adverse (in EIA terms) effect upon the setting of the non-designated possible moated site (Asset 407) within the north-western corner of Site D as is presented in Section 3 of **ES Vol 2 Appendix 6-4 [EN010141/DR/6.2]** and in Paragraphs 6.8.64 and 6.8.65 of this chapter.

Document	Policy / Paragraph Reference	Summary of Policy / Paragraph	Where addressed in the ES?
			The Applicant has recommended a mitigation strategy related to the potential for direct and indirect impacts on potential archaeological remains as is presented in Section 6.9 of this chapter and the **oAMS [EN010141/DR/7.15]**.
	Paragraph 5.9.27	*When considering the impact of a proposed development on the significance of a designated heritage asset, the Secretary of State should give great weight to the asset's conservation. The more important the asset, the greater the weight should be. This is irrespective of whether any potential harm amounts to substantial harm, total loss, or less than substantial harm to its significance.*	Effects of no greater than a Minor level of effect (i.e. not significant in EIA terms) that equate to '*less than substantial harm'* are predicted upon the setting of designated heritage assets. In most cases impacts upon designated heritage assets as a result of changes to their settings are judged to be Negligible, Neutral or None. This is detailed in Section 3 of **ES Vol 2 Appendix 6-4 [EN010141/DR/6.2]** and summarised in paragraphs 6.8.58 to 6.8.65 of this chapter.
	Paragraph 5.9.29	It is noted that '*Substantial harm to or loss of significance of a grade II Listed Building or a grade II Registered Park or Garden should be exceptional'*	The assessment of potential settings effects has identified no significant (in EIA terms) effects upon the setting of any designated heritage assets as is detailed in Section 3 of **ES Vol 2 Appendix 6-4 [EN010141/DR/6.2]** and in Paragraphs 6.8.58 to 6.8.65 of this chapter. There are no predicted effects upon any grade II listed buildings or registered park and garden that would be equivalent to *'substantial*

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			harm' or cause *'loss of significance'*.
	Paragraph 5.9.30	It is noted that *'Substantial harm to or loss of significance of assets of the highest significance, including Scheduled Monuments; Protected Wreck Sites; Registered Battlefields; grade I and II* Listed Buildings; grade I and II* Registered Parks and Gardens; and World Heritage Sites, should be wholly exceptional'.*	The assessment of potential settings effects has identified no significant (in EIA terms) effects upon the setting of any designated heritage assets as is detailed in **ES Vol 2 Appendix 6-4 [EN010141/DR/6.2]** and in Paragraphs 6.8.58 to 6.8.65 of Chapter 6 of the ES. There are no predicted effects upon any scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens or world heritage sites that would be equivalent to *'substantial harm'* or cause *'loss of significance'*
	Paragraph 5.9.31	It is noted that where a *'proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset' consent should be refused unless it can be demonstrated that 'the substantial harm to, or loss of, significance is necessary to achieve substantial public benefits that outweigh that harm or loss' or that: 'the nature of the heritage asset prevents all reasonable uses of the site, no viable use of the heritage asset*	The assessment of potential settings effects has identified no significant (in EIA terms) effects upon the setting of any designated heritage assets as is detailed in Section 3 of **ES Vol 2 Appendix 6-4 [EN010141/DR/6.2]** and in Paragraphs 6.8.58 to 6.8.65 of this chapter. There are no predicted effects upon any designated assets that would be equivalent to *'substantial harm'* or cause '*total loss of significance'*.

Document	Policy / Paragraph Reference	Summary of Policy / Paragraph	Where addressed in the ES?
		itself can be found in the medium term through appropriate marketing that will enable its conservation, conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible, the harm or loss is outweighed by the benefit of bringing the site back into use'.	
	Paragraph 5.9.32	It is noted that *'Where the proposed development will lead to less than substantial harm to the significance of the designated heritage asset, this harm should be weighed against the public benefits of the proposal, including, where appropriate securing its optimum viable use'.*	The Applicant has assessed the impact of the Scheme upon designated heritage assets. Effects of no greater than a Minor level of effect (i.e. not significant in EIA terms) that equate to *'less than substantial harm'* are predicted upon the setting of designated heritage assets. In most cases impacts upon designated heritage assets as a result of changes to their settings are judged to be Negligible, Neutral or None. This is detailed in in Section 3 of **ES Vol 2 Appendix 6-4 [EN010141/DR/6.2]** and summarised in paragraphs 6.8.58 to 6.8.65 of this chapter. The predicted levels of *'less than substantial harm'* are at the low to mid end of the scale and it is considered that there is no potential to further mitigate these effects (which are not significant in EIA terms).

Document	Policy / Paragraph Reference	Summary of Policy / Paragraph	Where addressed in the ES?
			Paragraphs 6.8.66 to 6.8.70 of this chapter note that upon the completion of the decommissioning the long-term effects of the operational phase on the setting of assets would be removed, with the setting of those assets restored to the current baseline condition with the exception of the elements of new green infrastructure which would be left in place at the point of decommissioning. An **oHES [EN010141/DR/7.16]**, has also been produced which contains recommended measures for making a positive contribution to the historic environment. These measures are also presented in Paragraphs 6.7.33 to 6.7.36 of this chapter. The public benefits of the proposal, including the demonstrable need for the Scheme, are set out in the **Planning Statement [EN010141/DR/5.3]**.
	Paragraph 5.9.33	Notes that *'In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset'.*	The potential for impacts upon non-designated heritage assets has been assessed. The identified and potential non-designated heritage assets which may be subject to direct and indirect impacts are presented in Section 3 of **ES Vol 2 Appendix 6-2 [EN010141/DR/6.2]** and Tables 6.9 to 6.15 of this chapter. The embedded mitigation in relation to direct or indirect impacts is largely related to

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			the design avoiding known heritage assets (or via proposed '*no dig solutions*' within defined of Areas of Archaeological Constraint – AACs), as is presented in Section 6.7 of this chapter and in the **oAMS [EN010141/DR/7.15]**. A balanced approach to mitigation strategies for the identified direct and indirect impacts upon heritage assets which cannot be avoided by design is presented in Section 6.9 of this chapter and in the **oAMS [EN010141/DR/7.15]**. The non-designated heritage assets which are considered subject to settings impacts are presented in Paragraph 1.2.9 of **ES Vol 2 Appendix 6-4 [EN010141/DR/6.2]** and Para 6.6.71 of this chapter. The Applicant has identified a significant adverse (in EIA terms) effect upon the setting of the non-designated possible moated site (Asset 407) within the north-western corner of Site D, as is presented in Section 3 of **ES Vol 2 Appendix 6-4 [EN010141/DR/6.2]** and in Paragraphs 6.8.64 and 6.8.65 of this chapter.
NPS EN-3	Paragraph 2.10.107	Notes that *'The impacts of solar PV developments on the historic environment will require expert assessment in most cases and may have effect both above and below ground.'*	The Applicant has conducted expert assessment of the impact of the Scheme which is presented in this chapter and supporting appendices.

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	Paragraph 2.10.108	Notes that '*Above ground impacts may include the effects on the setting of Listed Buildings and other designated heritage assets as well as on Historic Landscape Character'.*	The Applicant carried out an assessment of the effects on the setting of listed buildings and other designated heritage assets. The assessment of potential setting effects has considered all locally listed buildings within 1km, all designated assets within 3km and selected designated assets beyond 3km as agreed via scoping consultation with Historic England, BBHET and CHET. Selected non-designated assets were also scoped in to the assessment of potential setting effects as agreed via consultation with BBHET and CHET. The baseline for settings assessment is presented in Section 1.2 of **ES Vol 2 Appendix 6-4 [EN010141/DR/6.2]** and paras 6.6.60 to 6.6.71 of this chapter. The assessment of potential settings effects is presented in Section 3 of **ES Vol 2 Appendix 6-4 [EN010141/DR/6.2]** and in Paragraphs 6.8.51 to 6.8.65 of this chapter. Neither the BBHER nor the CHER were able to provide Historic Landscape Characterisation (HLC) data as Bedford Borough confirmed that they do not hold the data and Cambridgeshire note that the data is not suitable to be provided. Further discussion with BBHET has confirmed that the potential for impact on the historic landscape can

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			be undertaken as part of the settings impact assessments of the designated assets as considered within their landscapes, and by a map regression assessment which is presented within section 3.3 of **ES Vol 2 Appendix 6-2 [EN010141/DR/6.2]**.
	Paragraph 2.10.109	Notes that *'Below ground impacts, although generally limited, may include direct impacts on archaeological deposits through ground disturbance associated with trenching, cabling, foundations, fencing, temporary haul routes etc.*'	The Applicant carried out an assessment of the potential for direct and indirect effects upon buried archaeological remains. The identified and potential heritage assets which may be subject to direct and indirect impacts are presented in Section 3 of **ES Vol 2 Appendix 6-2 [EN010141/DR/6.2]** and Tables 6.9 to 6.15 of this chapter. The embedded mitigation in relation to direct or indirect impacts is largely related to the design avoiding known heritage assets (or via proposed 'no dig solutions' within defined of Areas of Archaeological Constraint – AACs), as is presented in Section 6.7 of this chapter and in the **oAMS [EN010141/DR/7.15]**. A balanced approach to mitigation strategies for the identified direct and indirect impacts upon heritage assets which cannot be avoided by design is presented in Section 6.9 of this chapter and in the **oAMS [EN010141/DR/7.15]**.

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	Paragraph 2.10.110	Notes that *'Equally, solar PV developments may have a positive effect, for example archaeological assets may be protected by a solar PV farm as the site is removed from regular ploughing and shoes or low-level piling is stipulated'.* Footnote 94 notes that *'The results of pre-determination archaeological evaluation inform the design of the scheme and related archaeological planning conditions'.*	Archaeological geophysical survey and field evaluation has been undertaken across the Scheme with their results presented in reports which form **ES Vol 2 Appendix 6-5 to Appendix 6-9 [EN010141/DR/6.2]**. The embedded mitigation in relation to direct or indirect impacts is largely related to the design avoiding known heritage assets (or via proposed 'no dig solutions' within defined of Areas of Archaeological Constraint – AACs), as is presented in Section 6.7 of this chapter and in the **oAMS [EN010141/DR/7.15]**. A balanced approach to mitigation strategies for the identified direct and indirect impacts upon heritage assets which cannot be avoided by design is presented in Section 6.9 of this chapter and in the **oAMS [EN010141/DR/7.15]**.
	Paragraph 2.10.112	Notes that '*Applicant assessments should be informed by information from Historic Environment Records (HERs) or the local authority'.*	Section 6.4 of this chapter presents the methodology and approach to determining significance of heritage assets (including non-designated assets) and Paragraph 6.4.2 sets out the data sources that were consulted including the BBHER and CHER.
	Paragraph 2.10.113	Notes that *'where a site on development is proposed includes, or has the potential to*	The Applicant has produced desk-based assessment (inclusive of the results of a walkover survey) outlining

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		include, heritage assets with archaeological interest the applicant should submit an appropriate desk-based assessment and, where necessary, a field evaluation. These should be carried out using expertise where necessary and 'in consultation with the local planning authority, and should identify archaeological study areas and propose appropriate schemes of investigation, and design measures, to ensure the protection of relevant heritage assets.'	the archaeological baseline which forms **ES Vol 2 Appendix 6-2 [EN010141/DR/6.2]** and a detailed assessment of settings effects which forms **ES Vol 2 Appendix 6-4 [EN010141/DR/6.2]**. The scope of the assessment was agreed and refined via consultation and engagement with various stakeholders including HE, BBHET and CHET, with details of this presented in Section 6.3 of this chapter. Archaeological geophysical survey and field evaluation has been undertaken across the Scheme with their results presented in reports which form **ES Vol 2 Appendix 6-5 to Appendix 6-9 [EN010141/DR/6.2]**. The embedded mitigation in relation to direct or indirect impacts is largely related to the design avoiding known heritage assets (or via proposed 'no dig solutions' within defined of Areas of Archaeological Constraint – AACs), as is presented in Section 6.7 of this chapter and in the **oAMS [EN010141/DR/7.15]**. A balanced approach to mitigation strategies for the identified direct and indirect impacts upon heritage assets which cannot be avoided by design is presented in Section 6.9 of this chapter and in the **oAMS [EN010141/DR/7.15]**. The Applicant has identified a significant adverse (in EIA terms) effect upon the setting of the non-designated

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			possible moated site (Asset 407) within the north-western corner of Site D, as is presented in Section 3 of **ES Vol 2 Appendix 6-4 [EN010141/DR/6.2]** and in Paragraphs 6.8.64 and 6.8.65 of this chapter. Effects of no greater than a Minor level of effect (i.e. not significant in EIA terms) that equate to *'less than substantial harm'* are predicted upon the setting of heritage assets. In most cases impacts upon designated heritage assets as a result of changes to their settings are judged to be Negligible, Neutral or None. This is detailed in in Section 3 of **ES Vol 2 Appendix 6-4 [EN010141/DR/6.2]** and summarised in paragraphs 6.8.58 to 6.8.65 of this chapter.
	Paragraphs 2.10.114 and 2.10.115	Notes that *'In some instances, field studies may include investigative work (and may include trial trenching beyond the boundary of the proposed site) to assess the impacts of any ground disturbance, such as proposed cabling, substation foundations or mounting supports for solar panels on archaeological assets.'* *And that 'The extent of investigative work should be*	Archaeological geophysical survey and field evaluation has been undertaken across the Scheme (with no works required beyond its boundary, as confirmed within the WSI produced in consultation with CHET, BBHET and HE) with their results presented in reports which form **ES Vol 2 Appendix 6-5 to Appendix 6-9 [EN010141/DR/6.2]**. The embedded mitigation in relation to direct or indirect impacts is largely related to the design avoiding known heritage assets (or via proposed 'no dig solutions' within defined of Areas of Archaeological Constraint –

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		proportionate to the sensitivity of, and extent of, proposed ground disturbance in the associated study area'.	AACs), as is presented in Section 6.7 of this chapter and in the **oAMS [EN010141/DR/7.15]**. A balanced approach to mitigation strategies for the identified direct and indirect impacts upon heritage assets which cannot be avoided by design is presented in Section 6.9 of this chapter and in the **oAMS [EN010141/DR/7.15]**.
	Paragraph 2.10.116	Notes that '*Applicants should take account of the results of historic environment assessments in their design proposal.'*	The Applicant, from the outset of the project, has utilised results of historic environment assessments i.e. the desk-based information on heritage assets, to inform the design and avoid the potential for significant effects on these assets where possible, as set out in Section 3.3 of **ES Vol 1 Chapter 3: Alternatives and Design Evolution [EN010141/DR/6.1]** and Section 5.6 of the **Design Approach Document [EN010141/DR/5.6]**. The Applicant has avoided, where possible, direct and indirect impacts upon identified heritage assets allowing for them to continue to be preserved in situ, as is detailed in section 6.7 of this chapter and the **oAMS [EN010141/DR/7.15]**.
	Paragraph 2.10.117	Notes that *'Applicants should consider what steps can be taken to ensure heritage assets are conserved in a manner appropriate to their*	The Applicant has avoided, where possible, direct and indirect impacts upon identified heritage assets allowing for them to continue to be preserved in situ (which is a manner of

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		significance, including the impact of proposals on views important to their setting.'	conservation appropriate to their significance as heritage assets- via the definition of AACs), as is presented in Section 6.7 of this chapter and in the **oAMS [EN010141/DR/7.15].** Where direct and indirect impacts cannot be avoided a proposed mitigation strategy, as is presented in Section 6.9 of this chapter and in the **oAMS [EN010141/DR/7.15]** would allow for them to be preserved by record (which is a manner of conservation appropriate to their significance as heritage assets). The Applicant has identified a significant adverse (in EIA terms) effect upon the setting of the non-designated possible moated site (Asset 407) within the north-western corner of Site D, as is presented in Section 3 of **ES Vol 2 Appendix 6-4 [EN010141/DR/6.2**] and in Paragraphs 6.8.64 and 6.8.65 of this chapter. Effects of no greater than a Minor level of effect (i.e. not significant in EIA terms) that equate to *'less than substantial harm'* are predicted upon the setting of designated heritage assets. In most cases impacts upon designated heritage assets as a result of changes to their settings are judged to be Negligible, Neutral or None. This is detailed in in Section 3 of **ES Vol 2 Appendix 6-4 [EN010141/DR/6.2]** and summarised in paragraphs

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			6.8.58 to 6.8.65 of this chapter. No further steps are required to conserve these heritage assets in relation to the Scheme. Options for offsetting the effects upon these assets through public benefit are outlined in Section 6.7 and within the **oHES [EN010141/DR/7.16]**. Upon the completion of decommissioning the long-term effects of the operational phase on the setting of assets would be removed. As such residual effects following decommissioning would be neutral, and, therefore, not significant.
	Paragraph 2.10.118	Notes that '*As the significance of a heritage asset derives not only from its physical presence but also from its setting, careful consideration should be given to the impact of large-scale solar farms which depending on their scale, design, and prominence, may cause substantial harm to the significance of the asset.'*	The Applicant has assessed the likely effects of the Scheme, including those derived from impacts upon the setting of designated assets. Section 6.4 of this chapter presents the methodology and approach to determining significance of heritage assets (including non-designated assets) and Paragraph 6.4.2 sets out the data sources that were consulted including the BBHER and CHER. Descriptions of all heritage assets identified within the study areas is included within **ES Vol 2 Appendix 6-1 [EN010141/DR/6.2]** with further discussion of the identified heritage baseline (formed by these assets) presented in Section 3 of **ES**

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			Vol 2 Appendix 6-2 [EN010141/DR/6.2]. The identified and potential non-designated heritage assets which may be subject to direct and indirect impacts are presented in Section 3 of **ES Vol 2 Appendix 6-2 [EN010141/DR/6.2]** and Tables 6.9 to 6.15 f this chapter. Paragraphs 6.4.7 to 6.4.14 of this chapter presents the methodology and approach to establishing the relative sensitivity of a heritage asset to changes to its setting. The assessment of potential setting effects includes descriptions of the significance of the settings of the heritage assets as is presented in Table 1.0 of **ES Vol 2 Appendix 6-4 [EN010141/DR/6.2]** and Paragraphs 6.8.51 to 6.8.65 of this chapter.
	Paragraph 2.10.119	Notes that '*Applicants may need to include visualisations to demonstrate the effects of a proposed solar farm on the setting of heritage assets.'*	The setting assessment is supported by, and includes cross references to, representative visualisations produced for **ES Vol 1 Chapter 5: Landscape and Visual [EN010141/DR/6.1]**,
NPS EN-5	n/a	n/a	No specific requirements in relation to the assessment of cultural heritage.
NPPF	Paras 207-208 and 210	*Paragraph 207* *In determining applications, local planning authorities should require an applicant to describe*	The Applicant has assessed the likely effects of the Scheme upon heritage assets. Section 6.4 of this chapter presents the methodology

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		the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation'. *Paragraph 208* *Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a*	and approach to determining significance of heritage assets, including the data sources that were consulted such as the BBHER and the CHER. The embedded mitigation in relation to direct or indirect impacts is largely related to the design avoiding known heritage assets (or via proposed 'no dig solutions' within defined of Areas of Archaeological Constraint – AACs), as is presented in Section 6.7 of this chapter. The mitigation strategies for the identified direct and indirect impacts upon heritage assets is presented in Section 6.9 of this chapter and in the **oAMS [EN010141/DR/7.15]**. The assessment of potential setting effects has considered all Locally listed buildings within 1km, all designated assets within 3km and selected designated assets beyond 3km as agreed via scoping consultation with Historic England, BBHET and CHET. Selected non-designated assets were also scoped in to the assessment of potential setting effects as agreed via consultation with BBHET and CHET. The baseline for settings assessment is presented in Section 1.2 of **ES Vol 2 Appendix 6-4 [EN010141/DR/6.2]** and paras 6.6.60 to 6.6.71 of this chapter. The Applicant has identified a significant adverse (in EIA terms) effect upon the setting of the non-designated

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		heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal. *Paragraph 210.* *In determining applications, local planning authorities should take account of:* *(a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;* *(b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and* *(c) the desirability of new development making a positive contribution to local character and distinctiveness.*	possible moated site (Asset 407) within the north-western corner of Site D, as is presented in Section 3 of **ES Vol 2 Appendix 6-4 [EN010141/DR/6.2]** and in paragraphs 6.8.64 and 6.8.65 of this chapter. Effects of no greater than a Minor level of effect (i.e. not significant in EIA terms) that equate to 'less than substantial harm' are predicted upon the setting of designated heritage assets. In most cases impacts upon designated heritage assets as a result of changes to their settings are judged to be Negligible, Neutral or None. This is detailed in in Section 3 of **ES Vol 2 Appendix 6-4 [EN010141/DR/6.2]** and summarised in paragraphs 6.8.58 to 6.8.65 of this chapter.
	Para 214	Notes that *'Where a proposed*	The assessment of potential settings effects has identified

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		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: *a) the nature of the heritage asset prevents all reasonable uses of the site; and* *b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and* *c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and* *d) the harm or loss is outweighed by the benefit of bringing the site back into use.*	no significant (in EIA terms) effects upon the setting of any designated heritage assets as is detailed in Section 3 of **ES Vol 2 Appendix 6-4 [EN010141/DR/6.2]** and in Section 6.8 of this chapter. There are no predicted effects upon any designated heritage assets that would be equivalent to *'substantial harm'*.
	Para 215	Notes that *'Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed*	The Applicant has assessed the impact of the Scheme upon designated heritage assets. Effects of no greater than a Minor level of effect (i.e. not significant in EIA terms) that

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		against the public benefits of the proposal including, where appropriate, securing its optimum viable use'.	equate to '*less than substantial harm'* are predicted upon the setting of designated heritage assets. In most cases impacts upon designated heritage assets as a result of changes to their settings are judged to be Negligible, Neutral or None. This is detailed in in Section 3 of **ES Vol 2 Appendix 6-4 [EN010141/DR/6.2]** and summarised in paragraphs 6.8.58 to 6.8.65 of this chapter. The predicted levels of *'less than substantial harm'* are at the low to mid end of the scale and it is considered that there is no potential to mitigate these effects (which are not significant in EIA terms). Paragraphs 6.8.66 to 6.8.70 of this chapter note that upon the completion of the decommissioning the long-term effects of the operational phase on the setting of assets would be removed, with the setting of those assets restored to the current baseline condition with the exception of the elements of new green infrastructure which would be left in place at the point of decommissioning. An **oHES [EN010141/DR/7.16]**, has also been produced which contains measures for making a positive contribution to the historic environment. These measures are also presented in Section 6.9 of this chapter.

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			The public benefits of the Scheme are set out in the **Planning Statement [EN010141/DR/5.3]**.
	Para 216	States that '*The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset'.*	The potential for impacts upon non-designated heritage assets has been assessed. The identified and potential non-designated heritage assets which may be subject to direct and indirect impacts are presented in Section 3 of **ES Vol 2 Appendix 6-2 [EN010141/DR/6.2]** and Tables 6.9 to 6.15 of this chapter. The Applicant has set out a mitigation strategy related to the potential for direct and indirect impacts on potential archaeological remains as is presented in the **oAMS [EN010141/DR/7.15]** and Section 6.9 of this chapter. The non-designated heritage assets which are considered subject to settings impacts are presented in Paragraph 1.2.9 of **ES Vol 2 Appendix 6-4 [EN010141/DR/6.2]** and Para 6.6.71 of this chapter.
	Para 218	States that where any significance of a heritage assets is to be *"lost (wholly or in part)"* that the asset should be recorded *"in a manner proportionate to their importance and the impact*" of development.	Descriptions of all heritage assets identified within the study areas are included within **ES Vol 2 Appendix 6-1 [EN010141/DR/6.2]** with further discussion of the identified heritage baseline (formed by these assets) presented in Section 3 of **ES Vol 2 Appendix 6-2 [EN010141/DR/6.2]**. The mitigation strategies for the identified direct and indirect impacts (which

Document	Policy / Paragraph Reference	Summary of Policy / Paragraph	Where addressed in the ES?
			includes details of how the assets will be recorded) upon heritage assets is presented in Section 6.9 of this chapter and in the **oAMS [EN010141/DR/7.15]**.
PPG – Historic Environment	Paragraph: 003 Reference ID: 18a-003-20190723	Notes that '…*plans should set out a positive strategy for the conservation and enjoyment of the historic environment. In developing their strategy, plan-making bodies should identify specific opportunities within their area for the conservation and enhancement of heritage assets, including their setting. This could include, where appropriate, the delivery of development that will make a positive contribution to, or better reveal the significance of, the heritage asset, or reflect and enhance local character and distinctiveness with particular regard given to the prevailing styles of design and use of materials in a local area'.*	The mitigation strategy for the identified direct and indirect impacts upon non-designated assets is presented in the **oAMS [EN010141/DR/7.15]** and Section 6.9 of the chapter. An **oHES [EN010141/DR/7.16]**, has also been produced which contains recommended measures for making a positive contribution to the historic environment. These measures are also presented in Section 6.9 of this chapter.
	Paragraph: 009 Reference ID: 18a-009-20190723	Notes that *'Applicants are expected to describe in their application the significance of any heritage assets affected, including any contribution made by their setting. In doing so, applicants*	Section 6.4 of this chapter presents the methodology and approach to determining significance of heritage assets (inclusive of contributions made by their settings). Descriptions of all heritage assets identified within the

Document	Policy / Paragraph Reference	Summary of Policy / Paragraph	Where addressed in the ES?
		should include analysis of the significance of the asset and its setting, and, where relevant, how this has informed the development of the proposals. The level of detail should be proportionate to the asset's importance and no more than is sufficient to understand the potential impact of the proposal on its significance'.	study areas is included within **ES Vol 2 Appendix 6-1 [EN010141/DR/6.2]** with further discussion of the identified heritage baseline (formed by these assets) presented in Section 3 of **ES Vol 2 Appendix 6-2 [EN010141/DR/6.2]**. The assessment of potential setting effects includes descriptions of the significance of the settings of the heritage assets as is presented in Table 1.0 of **ES Vol 2 Appendix 6-4 [EN010141/DR/6.2]** and Section 6.8 of this chapter.

Local Planning Policy

6.2.5 The Scheme lies within the administrative boundaries of Bedford Borough Council (BBC) and Huntingdonshire District Council (HDC), with HDC being a two-tier authority with Cambridgeshire County Council. Planning policy of relevance to the assessment that has been considered includes:

- Huntingdonshire Local Plan to 2036[9];
- Bedford Borough Local Plan 2030[10];
- Great Staughton Neighbourhood Plan 2021 to 2036[11].

6.2.6 Relevant policies from the above documents are summarised in Table 6.2:

Table 6.2: Summary of Local Planning Policy

Document	Policy / Paragraph Reference	Summary of Policy	Where addressed in the ES?
Huntingdonshire Local Plan to 2036	Policy LP 34	Sets the policy for heritage assets and their settings. Requires that where heritage assets are to be impacted that an assessment will be required. Outlines what is required in the assessment of heritage assets and their settings.	The Applicant has described the significance of heritage assets that will be impacted by the Scheme. Section 6.4 of this chapter presents the methodology and approach to determining significance of heritage assets (including non-designated assets) and sets out the data sources that were consulted including the BBHER and CHER. Descriptions of all heritage assets identified within the study areas is included within **ES Vol 2 Appendix 6-1 [EN010141/DR/6.2]** with further discussion of the identified heritage baseline (formed by these assets) presented in Section 3 of **ES Vol 2 Appendix 6-2 [EN010141/DR/6.2]**. The identified and potential non-designated heritage assets which may be subject to direct and indirect impacts are presented in Section 3 of **ES Vol 2 Appendix 6-2 [EN010141/DR/6.2]** and Section 6.8 of this chapter. The assessment of potential setting effects includes descriptions of the significance of the settings of the heritage assets as is presented in Table 1 of **ES Vol 2 Appendix 6-4 [EN010141/DR/6.2]** and

Document	Policy / Paragraph Reference	Summary of Policy	Where addressed in the ES?
			in Section 6.8 of this chapter.
Bedford Borough Local Plan 2030	Policy 28S	Expects development to contribute to good place making by taking a proactive approach to sustaining and enhancing the historic environment	The mitigation strategy for the identified direct and indirect impacts upon non-designated assets is presented in the **oAMS [EN010141/DR/7.15]** and Section 6.9 of this chapter. An **oHES [EN010141/DR/7.16]**, has also been produced which contains measures for making a positive contribution to the historic environment. These measures are also presented in Section 6.9 of this chapter. The public benefits of the Scheme are set out in the **Planning Statement [EN010141/DR/5.3]**.
	Policy 41S	Requires development, where it impacts heritage assets, to provide sufficient information about the heritage assets and the anticipated impact. Notes that non-invasive and invasive fieldwork may be required to provided sufficient information to understand the heritage baseline. Requires any mitigation to take cognisance of the heritage assets' significance and the predicted level of impact.	The Applicant has described the significance of heritage assets that will be impacted by the Scheme. Section 6.4 of this chapter presents the methodology and approach to determining significance of heritage assets (including non-designated assets) and sets out the data sources that were consulted including the BBHER and CHER. Descriptions of all heritage assets identified within the study areas is included within **ES Vol 2 Appendix 6-1 [EN010141/DR/6.2]** with

Document	Policy / Paragraph Reference	Summary of Policy	Where addressed in the ES?
			further discussion of the identified heritage baseline (formed by these assets) presented in Section 3 of **ES Vol 2 Appendix 6-2 [EN010141/DR/6.2]**. The identified and potential non-designated heritage assets which may be subject to direct and indirect impacts are presented in Section 3 of **ES Vol 2 Appendix 6-2 [EN010141/DR/6.2]** and Section 6.8 of this chapter. Archaeological geophysical survey and field evaluation has been undertaken across the Scheme with their results presented in reports which form **ES Vol 2 Appendix 6-5 to Appendix 6-9 [EN010141/DR/6.2]**. The mitigation strategy for the identified direct and indirect impacts upon heritage assets is presented in the **oAMS [EN010141/DR/7.15]** and Section 6.9 of this chapter. The assessment of potential setting effects includes descriptions of the significance of the settings of the heritage assets as is presented in Table 1 of **ES Vol 2 Appendix 6-4 [EN010141/DR/6.2]** and Section 6.8 of this chapter.
Great Staughton	POLICY GSNP 9 -	Development proposals within, affecting the	The Applicant has assessed the potential for

Document	Policy / Paragraph Reference	Summary of Policy	Where addressed in the ES?
Neighbourhood Plan	Great Staughton Conservation Areas	setting of, or views into or out of, the Conservation Areas, should preserve or enhance the character and appearance of the Conservation Areas in accordance with Local Plan policy LP 34 by ensuring the proposals: i. Demonstrate a clear understanding of the significance of the Conservation Areas alongside an assessment of the potential impact of the proposal on that significance; ii. Use high quality, traditional materials and methods of construction; iii. Where appropriate, reduce the car dominated streetscape and create pedestrian friendly streets, iv. In Staughton Highway Conservation Area reflect the mix of dwelling types and retain the grassed and treelined boundaries; and v. In The Town Conservation Area retain the cottage style and open character reflecting its heritage. Development should preserve or enhance the setting of the Conservation and will be assessed against the content of the Great Staughton Landscape and Townscape Assessment. …	effects on the characters setting of the Great Staughton conservation areas. The assessment includes a description of the significance of the conservation areas as well as a description of the potential effects on that significance, as is set out in Table 1 of **ES Vol 2 Appendix 6-4 [EN010141/DR/6.2].** The setting assessment is supported by, and includes cross references to, representative visualisations produced for **ES Vol 1 Chapter 5: Landscape and Visual [EN010141/DR/6.1]** which includes key views that are highlighted within the Great Staughton Landscape and Townscape Assessment,

Document	Policy / Paragraph Reference	Summary of Policy	Where addressed in the ES?
	Policy GSNP10 – Designated and Non Designated Heritage Assets	A development proposal affecting a heritage asset or its setting is required to: i. Demonstrate that it is sympathetic to the asset(s) in terms of scale, materials and architectural distinctiveness and will not adversely affect the setting of the asset; ii. Be accompanied by archaeological investigations where relevant and in the event of significant and/or extensive remains being found, they shall be preserved in situ; iii. Be accompanied by a heritage statement setting out how harm has been avoided or minimised or the significance of those assets more effectively revealed for the community to appreciate. …	Descriptions of all heritage assets identified within the study areas is included within **ES Vol 2 Appendix 6-1 [EN010141/DR/6.2]** with further discussion of the identified heritage baseline (formed by these assets) presented in Section 3 of **ES Vol 2 Appendix 6-2 [EN010141/DR/6.2]**. The identified and potential non-designated heritage assets which may be subject to direct and indirect impacts are presented in Section 3 of **ES Vol 2 Appendix 6-2 [EN010141/DR/6.2]** and Section 6.8 of this chapter. The assessment of potential setting effects includes descriptions of the significance of the settings of the heritage assets as is presented in Table 1 of **ES Vol 2 Appendix 6-4 [EN010141/DR/6.2]** and in Section 6.8 of this chapter. An **oHES [EN010141/DR/7.16]**, has also been produced which contains recommended measures for making a positive contribution to the historic environment. These measures are also presented in Section 6.9 of this chapter.

Guidance

6.2.7 AOC Archaeology Group conforms to the standards of professional conduct outlined in the CIfA' Code of Conduct[12], Regulations of Professional Conduct[13]; and the CIfA Standards and Guidance for Historic Environment Desk Based Assessments[14], Standard and guidance for commissioning work or providing consultancy advice on archaeology and the historic environment[15], Historic England's (HE) Good Practice Advice Note 3: The Setting of Heritage Assets[16], International Council on Monuments and Sites (ICOMOS) Burra Charter Article One[17], Xi'an Declaration[18], the Department for Digital, Culture, Media and Sport (DDCMS) Principles for Selection of Listed Buildings[19] and Scheduled Monuments Policy Statements[20], and Institute of Environmental Management & Assessment (IEMA) Guidelines for Environmental Impact Assessment[21]. This assessment has been undertaken in compliance with the guidance listed above.

6.3 Consultation and Engagement

Scoping

6.3.1 Scoping of this cultural heritage and archaeology assessment was undertaken as part of a wider EIA scoping exercise, the findings of which were recorded in **ES Vol 2 Appendix 4-1: EIA Scoping Report [EN010141/DR/6.2]** that was submitted in October 2023.

6.3.2 A Scoping Opinion was received in December 2023 as presented in **ES Vol 2 Appendix 4-2: EIA Scoping Opinion [EN010141/DR/6.2]**. The feedback received from PINS and stakeholders within the Scoping Opinion has been reviewed and the points relating to this chapter are summarised in Table 6.3 below.

6.3.3 Table 6.3 sets out a record of relevant scoping responses:

Table 6.3: Scoping responses with respect to cultural heritage and archaeology

Consultee	Summary of Comments	Response to Consultation
PINS – EIA Scoping Opinion (December 2023)	***3.5.1 - Direct impacts to heritage assets - operation and decommissioning*** "*The Applicant proposes to scope this matter out* [direct effects during operational phase] *on the basis that direct impacts of the Proposed Development on heritage assets would be limited to the construction phase.* *The Inspectorate agrees that additional significant effects during operation and decommissioning are unlikely to occur and this matter can therefore be scoped out of further assessment"*	Direct impacts during operation and decommissioning scoped out. Relevant best practice or mitigation measures proposed to protect heritage assets during operation and decommissioning are set out in the **outline Operational Environmental Management Plan (oOEMP) [EN010141/DR/7.5]** and **outline Decommissioning Environmental Management Plan (oDEMP) [EN010141/DR/7.6]**,

Consultee	Summary of Comments	Response to Consultation
		as well as the **oAMS [EN010141/DR/7.15]**.
PINS – EIA Scoping Opinion (December 2023)	***3.5.2 - Setting impacts to designated heritage assets - construction*** *"The Scoping Report states that impacts to the setting of designated heritage assets during construction would be temporary in nature and limited to localised areas of working. As a result the Applicant considers that any temporary effects during construction would not exceed the impacts on setting during the operational phase and proposes to scope this matter out of further assessment.* *The Inspectorate considers that there is potential for significant effects to occur to the setting of designated heritage assets during construction of the Proposed Development and does not agree to scope this matter out of further assessment. Accordingly, the ES should include an assessment of this matter or provide information demonstrating agreement with the relevant consultation bodies and the absence of LSE."*	The potential for significant effects on heritage assets during the construction phase is considered in **ES Vol 2 Appendix 6-4 [EN010141/DR/6.2]** and Section 6.8 of this chapter.
PINS – EIA Scoping Opinion (December 2023)	***3.5.3 - Setting impacts to non-designated heritage assets*** *"The Applicant proposes to scope this matter out on the basis that non-designated assets are typically less sensitive to changes in their settings and unlikely to be subject to significant setting effects.* *However, the Scoping Report states that the ES will provide an assessment of setting impacts on non-designated heritage assets that are considered to be of national importance.* *The Inspectorate is content to scope out further assessment of setting impacts to non-designated heritage assets provided the ES includes an assessment of the setting impacts on nationally important non-designated heritage assets during all phases of the Proposed Development.* *The ES should fully justify the choice of heritage assets included in the assessment*	Non-designated heritage assets of potentially national importance have been identified and are set out in **ES Vol 2 Appendix 6-2 [EN010141/DR/6.2]**. Assessment of effects upon the setting of these non-designated heritage assets is provided in **ES Volume 2 Appendix 6-4 [EN010141/DR/6.2]** and Section 6.8 of this chapter.

Consultee	Summary of Comments	Response to Consultation
	and their locations should be depicted on a supporting plan. *The Applicant should also seek to agree the non-designated assets included within the assessment of setting with the relevant consultation bodies, including Historic England and Local Planning Authorities."*	
PINS – EIA Scoping Opinion (December 2023)	***3.5.4 - Setting impacts to designated heritage assets beyond 3km study area*** *"The Scoping Report states that designated assets beyond 3km from the DCO boundary are too distant to have their settings significantly affected by the Proposed Development. However, no evidence has been provided to explain why the use of a 3km Study Area is appropriate.* *In the absence of agreement with relevant consultation bodies, or robust justification to support the final Study Area, the Inspectorate considers that there is potential for the Proposed Development to lead to significant effects on the setting of designated heritage assets beyond 3km and are not in a position to agree to scope this matter out.* *The ES should provide an assessment of the potential setting impacts to designated heritage assets located beyond 3km or provide information demonstrating agreement with the relevant consultation bodies and the absence of LSE".*	A review of the zone of theoretical visibility indicated very limited, if no, potential for intervisibility beyond 3km (see **ES Vol 3 Figures 6-7 to 6-13 [EN010141/DR/6.3]**). Further consultation with CHET and BBHET agreed a list of designated heritage assets that would need to be included within assessment beyond the 3km area (March 2024). Assessment of effects upon the setting of these heritage assets is provided in **ES Vol 2 Appendix 6-4 [EN010141/DR/6.2]** and Section 6.8 of this chapter.
PINS – EIA Scoping Opinion (December 2023)	***3.5.5 - Archaeological surveys*** *"The Applicant should ensure that the information used to inform the assessment is robust and allows for suitable identification of below ground assets likely to be impacted by the Proposed Development.* *The Applicant should make effort to agree the need for intrusive investigations (paragraph 11.5.7 of the Scoping Report indicates that trial trenching/ evaluation and excavation may be carried out) with relevant consultation bodies.*	Consultation with CHET and BBHET to determine the extent of required intrusive evaluation followed issue of the draft geophysics report. A brief for the pre-determination trenching strategy was issued by BBHET and CHET for the investigations

Consultee	Summary of Comments	Response to Consultation
	Intrusive investigations should be completed prior to submission of the DCO application and reported in the ES, unless otherwise agreed with the relevant consultation bodies".	within Sites A, B, C and D.. The **oAMS [EN010141/DR/7.15]** sets out the approach that will be taken to further post-consent archaeological investigation.
PINS – EIA Scoping Opinion (December 2023)	***3.5.6 - Decommissioning effects*** *"The Scoping Report states that the setting of designated heritage assets may be changed during the decommissioning phase of the Proposed Development. However, a description of potential effects during decommissioning is not set out in the Scoping Report.* *The Applicant should ensure that the ES provides an explanation of how decommissioning would impact the setting of designated heritage sites where significant effects are likely to occur. A description of any relevant restoration measures should also be provided in the ES".*	The potential for significant effects on heritage assets during the decommissioning phase is considered in Section 6.8 of this chapter.
PINS – EIA Scoping Opinion (December 2023)	***3.5.7 - Indirect effects*** *"The ES should identify and assess any potential indirect effects on the historic environment, for example, changes in drainage patterns or compression of the ground from infrastructure which could affect below ground heritage assets or lead to subsidence of above ground buildings and monuments."*	The potential for indirect physical impacts is considered in Section 6.8 of the chapter (paragraphs 6.8.44 to 6.8.50). Liaison with the hydrology team indicates that as there are no significant excavations or underground obstructions that could affect groundwater movement, it is not anticipated that there would be any significant impacts on groundwater. The drainage strategy would mitigate

Consultee	Summary of Comments	Response to Consultation
		against any potential increase in run-off and so it is also not anticipated that there would be any increase in scour that could affect archaeology. On this basis no significant indirect physical effects are anticipated. The full hydrology assessment for the Scheme is provided in **ES Vol 1 Chapter 8 [EN010141/DR/6.1]**.
Bedford Borough Council – EIA Scoping Opinion (December 2023)	*"Providing information on, and the assessment of the potential impacts on historic landscape character from physical change, should also be produced to inform the forthcoming ES chapter.* *At present, whilst it is proposed to obtain HLC data from Historic Environment Records where it exists, there is no methodology given for assessing potential impacts.* *The Bedford Borough Historic Environment Team (BBHET) would be happy to discuss a detailed methodology with the developer's historic environment consultants."*	Neither the BBHER or CHER were able to provide HLC data as Bedford Borough confirmed that they do not hold the data and Cambridgeshire note that the data is not suitable to be provided. Further discussion with BBHET has confirmed that the potential for impact on the historic landscape can be undertaken as part of the settings impact assessments of the designated assets as considered within their landscapes, and by a map regression assessment (which forms part of **ES Vol 2 Appendix 6-2 [EN010141/DR/6.2]**).
Bedford Borough Council – EIA	*"As a whole, the Scoping Report doesn't appear to commit to considering the positive/beneficial effects that the proposed*	Opportunities for enhancement are set

Consultee	Summary of Comments	Response to Consultation
Scoping Opinion (December 2023)	*development could bring to the historic environment. EN-3 sets out example opportunities within paragraphs 2.10.110, and 5.9.13 of EN-1 provides similar, and could include cross-theme opportunities such as new green infrastructure – new paths/cycle routes, public green spaces etc. also acting as wayfinders to heritage sites and opening up some of the latter with improved presentation and interpretation.* *Other opportunities could be the retention and enhancement of existing historic hedgerows and field patterns through new planting and maintenance which also act as GI. Section 3.3.31 refers to how the layout and design of green infrastructure will be advanced prior to the preparation of the ES, so these opportunities will need to be considered at an early stage".*	out in Section 6.9 of the chapter. The Applicant has prepared an **oHES [EN010141/DR/7.16]** that sets out measures for enhancement.
Cambridgeshire County Council – EIA Scoping Opinion (December 2023)	*"It is standard practice in Cambridgeshire and regionally to intrusively evaluate solar developments predetermination to identify areas that might require preservation in situ, by nature of the significance of the archaeology or potential impractical expense to the developer of archaeological mitigation excavation. Large areas of significant or dense archaeology can in theory make a solar development unviable, as common 'no dig' solutions for panels and cabling can be considered inappropriate, depending on the depth, significance and fragility of the archaeology".*	Consultation with CHET and BBHET to determine extent of required intrusive evaluation followed issue of the draft geophysics report. A brief for the pre-determination trenching strategy was issued by BBHET and CHET for the investigations within Sites A, B, C and D. The **oAMS [EN010141/DR/7.15]** sets out the approach that will be taken to further post-consent archaeological investigation.
Historic England – EIA Scoping Opinion (December 2023)	*"It is stated in Section 9.4.5 that online mapping indicated that no peat is present at the Site. An assessment of the BGS Geoindex resource indicates that large areas of the proposed scheme have not been investigated, and so there is still the potential*	The geological baseline is set out in Section 4.1 of ***ES Vol 2 Appendix 6-2 [EN010141/DR/6.2]***.

Consultee	Summary of Comments	Response to Consultation
	that peat may be present in some parts of the site".	The potential for indirect physical impacts is considered in Sections 6.8 of the chapter. Liaison with the Hydrology team indicates that as there are no significant excavations or underground obstructions that could affect groundwater movement, it is not anticipated that there would be any significant impacts on groundwater. The drainage strategy would mitigate against any potential increase in run-off and so it is also not anticipated that there would be any increase in scour that could affect archaeology. The full hydrology assessment for the Scheme is provided in **ES Vol 1 Chapter 8 [EN010141/DR/6.1]**.
Historic England – EIA Scoping Opinion (December 2023)	*"It is stated that several tributaries drain the site (Section 9.4.1); the potential impact of the proposed Scheme on local groundwater levels should be considered. If waterlogged organic archaeological and palaeoenvironmental remains are present on the site, any changes to the groundwater levels may alter the local preservation conditions, which in turn may lead to the degradation and/or loss of any vulnerable remains.* *The potential for waterlogged organic archaeological and palaeoenvironmental*	The geological baseline is set out in Section 4.1 of **ES Vol 2 Appendix 6-2 [EN010141/DR/6.2]**. The potential for indirect physical impacts is considered in Section 6.8 (paragraphs 6.8.44 to 6.8.50) of the chapter.

Consultee	Summary of Comments	Response to Consultation
	remains within these sorts of features would need to be established so that the impact of the proposed scheme can be determined and mitigated".	Liaison with the Hydrology team indicates that are as there are no significant excavations or underground obstructions that could affect groundwater movement, it is not anticipated that there would be any significant impacts on groundwater. The drainage strategy would mitigate against any potential increase in run-off and so it is also not anticipated that there would be any increase in scour that could affect archaeology. The full hydrology assessment for the Scheme is provided in **ES Vol 1 Chapter 8 [EN010141/DR/6.1]**.
Historic England – EIA Scoping Opinion (December 2023)	*"It is stated that the increase in impermeable area of the site caused by changes in the use may increase overland flow of water, which in turn has the potential to increase scour in the watercourses (Section 9.5.6).* *The potential for archaeological and palaeoenvironmental remains to be present in these areas will need to be determined so that the potential impact of scour can be understood and managed".*	The geological baseline is set out in Section 4.1 of **ES Vol 2 Appendix 6-2 [EN010141/DR/6.2]**. The potential for indirect physical impacts is considered in Section 6.8 (paragraphs 6.8.44 to 6.8.50) of the chapter. Liaison with the Hydrology team indicates that are as there are no significant excavations or

Consultee	Summary of Comments	Response to Consultation
		underground obstructions that could affect groundwater movement, it is not anticipated that there would be any significant impacts on groundwater. The drainage strategy would mitigate against any potential increase in run-off and so it is also not anticipated that there would be any increase in scour that could affect archaeology. The full hydrology assessment for the Scheme is provided in **ES Vol 1 Chapter 8 [EN010141/DR/6.1]**.
Historic England – EIA Scoping Opinion (December 2023)	*"Historic England supports the proposal to create a buffer around the monument but proposed 20m is not sufficient.* *We would normally expect 50m buffer as a minimum. The applicant should assess the impact of the development on the significance of the designated heritage asset, including impacts on the setting. The mitigation should be tailored specifically to avoid and minimise this impact".*	Buffer zone around the Two bowl barrows 900m and 1000m east of Old Manor Farm scheduled monument increased to 50m. Potential for direct impacts upon heritage assets outlined in Section 6.8 (paragraphs 6.8.1 to 6.8.43) of this chapter. Potential impacts upon the setting of designated assets outlined in Section 6.8 (paragraphs 6.8.51 to 6.8.65) of this chapter.

Consultee	Summary of Comments	Response to Consultation
		Mitigation proposals are set out in Section 6.9 of this chapter.
Historic England – EIA Scoping Opinion (December 2023)	*"Paragraphs 11.5.4 & 11.5.5 mention the possibility that the proposed development site contains additional, unknown so far, buried remains associated with the scheduled monuments (Two bowl barrows and Roman Villa complex).* *If these associated remains are present, they would be of demonstrably equal significance to designated heritage assets and should be considered under the same policies. Therefore, these remains would also need to be considered for exclusion from the scheme with appropriate buffer"*	Geophysical survey and trial trenching identified '*associated remains*' of *'demonstrably equal significance'* in the form of a Roman Town in the northern part of Site C which was scheduled in August 2024 (see paras 6.6.37 and 6.7.21 to 6.7.24). The Applicant has prepared a mitigation strategy (inclusive of areas of no development impact including this Scheduled Area) related to the potential for direct and indirect impacts on potential archaeological remains, as is presented in the **oAMS [EN010141/DR/7.15]** and Section 6.9 of this chapter.
Huntingdonshire District Council – EIA Scoping Opinion (December 2023)	*"Data - The Heritage Assets likely to be impacted include listed buildings, conservation areas, scheduled monuments and non-designated heritage assets. The applicant has provided a Gazetteer of Heritage Assets (Appendix 11-1) alongside plans of those heritage assets. Within the timeframe available a full assessment of the data submitted by the applicant is not possible.* *However, a basic overlay of submitted plans of heritage assets (Figures 11-4b – 11- 4d)*	Updated NHLE data, downloaded in July 2025 utilised in order to locate designated heritage assets (including listed buildings) within 3km of the Site. As noted in the baseline and settings assessment (**ES Vol 2 Appendices 6-2**

Consultee	Summary of Comments	Response to Consultation
	does not correlate with LPA mapping of listed buildings; both the Gazetteer and associated plans have notable omissions and inaccuracies. The base map and 3km line used is also noted to be inaccurate, for example excludes Kimbolton Castle (a Grade I listed building) however LPA mapping, based on OS data, would appear to include this site within the Study Area. Any assessment of impact to heritage assets must start with a full and clearly presented data set"	**and 6-4 [EN010141/DR/6.2]**), grade II listed buildings within conservation areas have not generally been assigned individual asset numbers and are instead, where relevant, referred to by their Listing Number and assessed as part of groups with their related conservation area. All heritage asset locations, excepting grade II listed buildings within conservation areas as noted above, are illustrated on **ES Vol 3 Figures 6-1 to 6-13 [EN010141/DR/6.3]**.
Huntingdonshire District Council – EIA Scoping Opinion (December 2023)	*Non-Designated Heritage Assets - The applicant has identified non-designated heritage assets within the site and in a 1km Study Area beyond the site boundary.* *The Report suggests that the settings of non-designated heritage assets are unlikely to be impacted and should therefore be Scoped Out.* *It is not accepted that non-designated heritage assets should be arbitrarily excluded from the ES. It is agreed that non designated heritage assets of subterranean archaeological interest are unlikely to have a setting but earthworks such as medieval ridge and furrow or windmill mounds certainly do have a setting in which they can be experienced.* *One important example is the extant medieval ridge and furrow located to the south of Great Staughton, adjacent to Site C of the proposed scheme. Any ES should include heritage assets that are earthworks; use of LiDAR data*	A shortlist of non-designated heritage assets of potentially national importance has been drawn up by AOC and is set out in **ES Vol 2 Appendix 6-2 [EN010141/DR/6.2]**. Further consultation with BBHET and CHET agreed list of non-designated assets to be included in settings assessment (March 2024). Assessment of effects upon the setting of these non-designated heritage assets is provided in

Consultee	Summary of Comments	Response to Consultation
	and imagery should form the basis of this assessment. Again, further refinement/justification is needed on this point".	**ES Vol 2 Appendix 6-4 [EN010141/DR/6.2]** and Section 6.8 of this chapter.

6.3.4 Following receipt of the scoping opinion, the Applicant engaged with Historic England and the host authorities to agree matters relevant to the assessment.

6.3.5 An initial meeting was held in Historic England in November 2023 where the following matters were agreed:

- HE requested information on what further investigative surveys could be required. The Applicant noted that the scope of further surveys would be dependent on findings of geophysical survey, and following discussion with County Archaeologists.
- HE agreed that they would join meetings alongside the County Archaeologists to avoid doubling up on briefings.
- Agreement reached that the next meeting should take place once the PINS Scoping Opinion and Scoping Responses from HE and the County Archaeologists have been received, as well as the results of the geophysical survey (likely to be January 2024).

6.3.6 A meeting was held with Historic England and CHET in January 2024 where the following matters were discussed and agreed:

- The details and timing of the issue of the WSI for the geophysical survey were discussed and CHET and HE noted that the approach that was set out was broadly acceptable though would be providing feedback (in relation to reporting and archiving) that would then need to be incorporated in to an updated WSI.

- The findings of the desk-based assessment and completed areas of the geophysical survey results were discussed. The Site C geophysical survey findings indicated a likely Romano-British settlement across the four fields in the north and east of Site C and options were presented in relation to this finding. CHETs strong preference was for this area to be removed from solar development areas, and HE suggested that the area would likely be scheduled.
- Approach to trial trenching was discussed. Project team highlighted that their preferred approach would be to undertake limited targeted trial trenching in locations where the geophysical survey suggests that archaeology should exist, and then use infrequent trial trenching across the remainder of the site where no archaeology is shown (with more extensive trenching undertaken post-determination secured by a requirement in the DCO). Cambridgeshire County Council (CCC) could not commit to any strategy on trial trenching until the geophysical survey report had been reviewed in full and HE noted that they would typically support and defer to the County Archaeologists on approach to archaeological investigation.
- The project team confirmed that expecting to issue the full geophysical survey report draft to the County Archaeologists and HE in late February.

6.3.7 A meeting was held with the historic environment officers at the host authorities and Historic England in March 2024 where the following matters were discussed and agreed:

- Discussion looking to agree the scope of assessment of *'non-designated assets of national importance'* that will be assessed in the ES was led by AOC who had identified a list of potential assets that fit the description via review of existing HER data and LiDAR analysis. The historic environment officers at BBC and HDC agreed that they were content to scope out the assessment of setting impacts on above ground non-designated buildings. BBC deferred to their archaeological officer (see meeting notes below) for comment on below ground or earthwork features. The historic

environment officer at HDC highlighted some areas of ridge and furrow (to the north of Site C) that they wanted to be scoped in to the setting assessment but were content to scope out setting impacts on below ground non-designated assets. The geophysical survey results within Site C were shared and it was confirmed that the assessment of the Roman town would be to assess it as of national significance (being treated as a de facto scheduled monument).

- The approach to the ZTV and 3km scope of the assessment was set out and the historic environment officer at HDC highlighted some designated assets (in particular noting Stonely Priory) beyond that distance that may need to be scoped in to the assessment. BBC were content that no designated assets within the Bedford Borough area beyond 3km would need to be scoped in to assessment.
- Agreement reached to undertake further review of the ZTV and provide a short list of designated heritage assets beyond 3km to be scoped in for agreement with the historic environment officer at HDC.
- Project team raised issue that scoping opinion required assessment of historic landscape character but that none of the data was available. BBC deferred comments to their archaeological officer (see separate meeting notes below) for comment on HLC data. HDC heritage officer highlighted that he would require historic inter-relationships between assets (especially around Great Staughton and Cretingsbury) to be considered as part of any assessment of their setting.
- Project team raised potential for heritage enhancement opportunities, BBC noted some possibilities for revealing lost views or providing interpretation. HDC noted it was difficult to comment until better understanding of the impacts of the Scheme was available.

6.3.8 A meeting was held with the archaeology officers at BBC and CCC, and Historic England in March 2024 where the following matters were discussed and agreed:

- BBC and CHET confirmed that they had no concerns about the scope of the geophysical survey or the approach taken though highlighted that some minor updates and revisions to the reporting would be required.
- HE suggested that the area of the Roman town in the northern part of Site C is subject to a limited trial trench investigation (three of four small trenches) in order to test the extent of the survival of any remains, the Applicant agreed to draw up a proposal and WSI for agreement with HE and CHET.
- HE note that the two bowl barrow scheduled monument on the southern edge of Site C may be Roman in date and it is agreed that the setting assessment should consider the inter-relationship between this feature and the newly discovered town.
- Discussion about the proposed substation location (Site C or Site D), confirmed by the Applicant that both options would be taken forward for consultation but acknowledged that HE and CHETs strong preference would be for the Site D option.
- Project team highlighted approach to assessment of indirect effects (having liaised with hydrology team) noting that it is not expected there would be any changes to groundwater as a result of the development. CHET and BBC agreed with this approach.
- Project team highlighted lack of available HLC data. Archaeological advisor to BBC confirmed that data is not available. It was agreed that in lieu of HLC data using a map regression analysis and existing setting assessment of assets would be appropriate. Project team discussed approach to setting assessment for no-designated assets, agreed to provide a shortlist of assets to scope in to BBC and CHET for agreement.

Statutory Consultation

6.3.9 Statutory consultation on the Scheme took place between September 2024 and October 2024. This included consultation on the Preliminary Environmental Information Report (PEIR) which contained a preliminary

assessment of cultural heritage and archaeology impacts and effects. The feedback received from statutory consultees is summarised within Table 6.4.

Table 6.4 – PEIR consultation responses with respect to cultural heritage and archaeology

Consultee	Summary of Comments	Response to Consultation
Historic England – PEIR Feedback (October 2024)	*'6.3.2 Historic England is content with the sources used for preparation of this PEIR.* *Archaeological Targeted Trial Trench Evaluation Report (Appendix 6-6) should be added to the list.* *The historic environment baseline information presented as part of full ES should also take into account additional results of geophysical surveys covering cable corridors connecting sites A-D and the grid connection to St Neots Substation; and results of trial Trench evaluation undertaken across sites A-D and cable corridors'.*	The interim archaeological trial trenching reports for the fieldwork are included as **ES Vol 2 Appendix 6-6 to 6-9 [EN010141/DR/6.2]**. The archaeological baseline presented in **ES Vol 2 Appendix 6-2 [EN010141/DR/6.2]** and summarised in Section 6.6 of this chapter have been updated to include reference to the completed additional areas of geophysical survey (the cable corridor between Sites C and D and the grid connection to St Neots Substation) and fieldwork (undertaken across Sites A to D). The geophysical survey is still to be completed in one field of Site B (sub-area B29). There are areas of the Order Limits that have not been accessible for trial trenching prior to the submission of the DCO. These principally include the cable corridors between East Park

Consultee	Summary of Comments	Response to Consultation
		Site B to C and East Park Site C to D and the Grid Connection Route as well as two fields within Site B (sub-areas B25 and B29) and one field within Site D (sub-area D02).
Historic England – PEIR Feedback (October 2024)	*'Table 6.5 Criteria for Establishing Importance of Heritage Assets - Non-designated Heritage Assets with archaeological interest of regional significance should be ascribed Medium Importance'.* *At the moment these archaeological remains appear to be classed as Low Importance because they are only recorded in local HER and do not meet the bar for national designation.* *There will be a range of significance represented in these assets and therefore a more effective and nuanced assessment would be welcomed.* *We also recommend that the wording describing criteria for Medium Importance Heritage Assets is amended for clarification'.*	The definitions of non-designated heritage assets within Table 6-5 of this chapter have been updated to reflect this feedback.
Historic England – PEIR Feedback (October 2024)	*'6.3.18 Historic England agrees that assessment should utilize use of professional judgement. Whilst standardised EIA matrices are considered in to be useful tools, we consider the analysis of setting (and the impact upon it) as a matter of qualitative and expert judgement which cannot be achieved solely by use of systematic matrices or scoring systems.* *Historic England recommends that standardised matrices should be provided in an appendix as material to support a clearly expressed and non-technical narrative argument within the cultural heritage chapter of ES'.*	The EIA matrices have been retained within Section 6.4 below and also replicated within **ES Vol 2 Appendix 6-4 [EN010141/DR/6.2]** (as per request of Bedford Borough feedback - see below). It is not considered necessary to include the assessment criteria tables as a separate appendix in addition. Qualitative judgements in relation to setting,

Consultee	Summary of Comments	Response to Consultation
		based on AOCs professional judgment, have been provided for all assets as is presented within Table 1 of **ES Vol 2 Appendix 6-4 [EN010141/DR/6.2]** and summarised within Section 6.8 of this chapter.
Historic England – PEIR Feedback (October 2024)	*'6.3.25 Historic England agrees that assessment of cumulative effects should be undertaken'*	The assessment of cumulative effects is presented in Section 6.11 of this chapter, and **ES Vol 1 Chapter 17 [EN010141/DR/6.1]**
Historic England – PEIR Feedback (October 2024)	*'6.4.2 We note that designated asset data was downloaded from HE website in February 2024. As the 'Roman Small Town south of Great Staughton' has been designated as a scheduled monument on 5th September 2024 the data should be updated'.*	Data update (August 2025) has been downloaded from the HE website and incorporated into the archaeological baseline of this chapter.
Historic England – PEIR Feedback (October 2024)	*6.4.5 We welcome the commitment to undertake geophysical survey along the grid connection to inform ES. We understand that grid connection means cable corridor between site D and St Neots substation.* *We note that cable corridors connecting sites A-D have not been mentioned. We take that this omission is an error as elsewhere in the document it has been clarified that all cable corridors will be subject to geophysical survey to inform ES.* *6.4.6 Historic England would like to highlight that the desk-based assessment and geophysical survey would not be sufficient to establish with certainty archaeological potential and significance of cable corridors and grid connection. Certain categories of buried archaeological remains are*	The interim archaeological trial trenching reports for the fieldwork are included as **ES Vol 2 Appendix 6-6 to 6-9 [EN010141/DR/6.2]**. There are areas of the Order Limits that have not been accessible for trial trenching prior to the submission of the DCO. These principally include the cable corridors

Consultee	Summary of Comments	Response to Consultation
	not readily detectable through use of these methods. Trial Trench evaluation would be necessary to ground truth the results of geophysical survey and provide adequate heritage baseline information for the ES. *All values for non-designated asset will effectively be provisional until these assets have been effectively characterised.* *All surveys should be undertaken prior to preparation of ES.*	between East Park Site B to C and East Park Site C to D and the Grid Connection Route as well as two fields within Site B (sub-areas B25 and B29) and one field within Site D (sub-area D02). The archaeological baseline presented in Section 6.6 of this chapter has been updated to include reference to the completed additional areas of geophysical survey and fieldwork. The **oAMS [EN010141/DR/7.15]** sets out the approach that will be taken to further post-consent archaeological investigation.
Historic England – PEIR Feedback (October 2024)	*6.6.30 Historic England notes that areas of the site C without recorded geophysical* *anomalies have been assigned 'Low potential' for presence of archaeological remains of any date. This assumption is not correct as certain categories of buried archaeological remains are not readily detectable through use of geophysical techniques. In the areas adjacent to the core of the Roman Town various forms of peripheral activity can be expected, such as communication routes, burial grounds, etc.* *In our view, trial Trench evaluation would be necessary to ground truth the results of geophysical survey and provide adequate heritage baseline information for the ES. This is of importance within site C.*	The interim archaeological trial trenching report for Site C is included as **ES Vol 2 Appendix 6-8 [EN010141/DR/6.2]**. The assessment of archaeological potential presented in Section 6.8 of this chapter has been updated to include reference to the completed trial trenching works within Site C.

Consultee	Summary of Comments	Response to Consultation
Historic England – PEIR Feedback (October 2024)	*6.6.32 Assessment of cable corridor between sites C to D. Western end of the corridor is located adjacent to newly designated Roman Town. Roman villa and bath house site is located close by to the south-west.* *We recommend that the potential for Roman remains is assessed as High. We welcome commitment to undertaking geophysical survey in this area. Trial Trench evaluation would be necessary to ground truth the results of geophysical survey and provide adequate heritage baseline information for the ES.* *6.6.39 We welcome commitment to undertaking geophysical survey along the grid connection corridor. Due to high archaeological potential of this area and presence of known cropmark sites within the boundaries of the scheme trial Trench evaluation would be necessary to ground truth the results of geophysical survey and provide adequate heritage baseline information for the ES.*	The assessment of archaeological potential presented in Section 6.8 of this chapter has been updated to acknowledge High potential for Roman remains within cable corridor between Sites C and D. The geophysical survey undertaken within the cable corridor between Sites C and D indicates no anomalies which appear to be directly related to the Roman Town. The **oAMS [EN010141/DR/7.15]** sets out the approach that will be taken to further post-consent archaeological investigation including trial trenching within the cable corridor between Sites C and D.
Historic England – PEIR Feedback (October 2024)	*6.7.2 Historic England notes that designation of Roman Small Town to the south of Great Staughton may result in a change to the proposed use of the land. We support removal of the scheduled monument from agricultural cultivation.* *As the area of the scheduled monument is also proposed to be used for ecological mitigation the details of the intended changes and long-term management of this site should be specified in the ES.* *6.7.4 Green Infrastructure proposed for the Scheme would cover the extent of the newly*	The interim archaeological trial trenching report for Site C is included as **ES Vol 2 Appendix 6-8 [EN010141/DR/6.2]**. The assessment of archaeological potential presented in Section 6.8 of this chapter has

Consultee	Summary of Comments	Response to Consultation
	Scheduled Roman small town. It is stated that there would be limited impacts upon buried archaeological remains with the area turned into grassland. This would represent significant improvement to the management of the scheduled monument, and we consider that it would be a heritage benefit. *Historic England supports the outlined approach. The details of appropriate long-term management of the site, such as fences, management and access arrangements, should be specified in the ES.* *We would like to remind that baseline information regarding archaeological resource is not complete. Archaeological trial Trench evaluation might identify additional areas which would require exclusion zones, especially to the south of the site C.* *Therefore, it will be necessary to review and made necessary amendments to the extent of the green infrastructure when complete heritage baseline is available.*	been updated to include reference to the completed trial trenching works within Site C. The Applicant has prepared a mitigation strategy (inclusive of areas of no impact) related to the potential for direct and indirect impacts on potential archaeological remains, as is presented in the **oAMS [EN010141/DR/7.15]** and Sections 6.7 and 6.9 of this chapter.
Historic England – PEIR Feedback (October 2024)	*6.7.6 We welcome inclusion of embedded measures to avoid harm to heritage assets. We would like to stress that this approach must be informed by complete heritage baseline data. Therefore, results of archaeological surveys (including trial Trench evaluation) would be crucial to inform the design of the scheme.*	The assessment of archaeological potential presented in Section 6.8 of this chapter has been updated to include reference to the completed trial trenching works. The Applicant has prepared a mitigation strategy (inclusive of areas of no impact) related to the potential for direct and indirect impacts on potential archaeological remains, as is presented in the **oAMS [EN010141/DR/7.15]** and Sections

Consultee	Summary of Comments	Response to Consultation
		6.7 and 6.9 of this chapter.
Historic England – PEIR Feedback (October 2024)	*6.7.7 We are pleased to see that the Outline Construction Environmental Management Plan (oCEMP) includes a commitment to avoid archaeological remains, including specific measures in relation to the Scheduled Roman small town as well as other more general measures regarding identified archaeological remains.* *However, we would like to highlight that location of two temporary construction compounds (as shown on PIER Figure 2-6: Indicative Construction Access and Compounds) overlaps with the extent of already identified archaeological remains.* *The affected archaeological remains are: Heritage Asset no. 210 and group of geophysical anomalies no. 41a within site A; and group of geophysical anomalies no. 43a within site C.* *The temporary compound will have a permeant effect on below ground archaeological remains. We therefore recommend that siting of compounds is reassessed, when full baseline heritage information is available. If possible, temporary compounds should be moved to areas of low archaeological potential.*	The interim archaeological trial trenching reports for the completed elements of the fieldwork are included as **ES Vol 2 Appendix 6-6 to 6-9 [EN010141/DR/6.2]**. The archaeological baseline presented in **ES Vol 2 Appendix 6-2 [EN010141/DR/6.2]** and summarised in Section 6.6 of this chapter have been updated to include reference to the completed additional areas of geophysical survey and fieldwork. This updated information has been used to inform the design and the mitigation strategy (inclusive of areas of no impact) related to the potential for direct and indirect impacts on potential archaeological remains, as is presented in the **oAMS [EN010141/DR/7.15]** and Sections 6.7 and 6.9 of this chapter. The location of the two temporary

Consultee	Summary of Comments	Response to Consultation
		compounds identified by Historic England have been moved to alternative locations, informed by the archaeological investigations. The compounds are shown on **ES Vol 3 Figure 2-5 [EN010141/DR/6.3]**.
Historic England – PEIR Feedback (October 2024)	*6.7.8 states that Areas of Archaeological Constraint (AAC) will be identified prior to construction and preserved in situ by using non-intrusive construction techniques.* *The details are presented in Volume 3, Fig 2-3a.* *We would like to highlight that only solar panels mounting is specified on the above figure. We would welcome the opportunity to review technical details of other infrastructure, such as low voltage cable connectors, transformers, fencing, etc. proposed in areas of archaeological sensitivity.* *The relevant details should be specified in the chapters or appendices of the ES.*	The Applicant has prepared a mitigation strategy (inclusive of defined Areas of Archaeological Constraint) related to the potential for direct and indirect impacts on potential archaeological remains, as is presented in the **oAMS [EN010141/DR/7.15]** and Section 6.7 and 6.9 of this chapter.
Historic England – PEIR Feedback (October 2024)	*6.7.13 Historic England welcomes the commitment to use horizontal directional drilling (HDD) for cabling works beneath the archaeology of the scheduled Roman Small town to the south of Great Staughton. We note that the engineering details have not been specified at this stage.* *The DCO application should specify the details of the engineering solution and clearly demonstrate that the drilling depth would be adequate to avoid impacts on the designated archaeological remains. Results of archaeological surveys and professional judgement should be used to inform the assessment.*	Details of the proposed HDD method, including location of the launch and receiving pits and depth are detailed within the **oAMS [EN010141/DR/7.15]**. Mitigation measures potential for bentonite slurry outbreak are provided in the

Consultee	Summary of Comments	Response to Consultation
	The assessment should include consideration of impacts and effects in the 'worst case' scenario. *In addition, the potential direct and indirect impacts associated with the lubricants used in these sorts of drilling approaches (e.g. bentonite slurry outbreak) will need to be considered. This should be refenced and referred back to in the main heritage chapter of the ES.* *Location of launch and receiving pits would need to be carefully considered and informed by results of archaeological surveys, including evaluation. These locations should avoid significant remains associated with Roman town as these might be of equivalent significance to designated heritage assets.* *Historic England also welcomes the statement that only temporary access track will be located across the south part of the scheduled monument Roman Small town to the south of Great Staughton.* *It should be clearly demonstrated in the ES that no impact will result from the construction, use and removal of the track. If the impacts are identified then additional engineering solutions should be specified, or alternative location should be sought.* *We would like to highlight that Indicative Construction Access and Compounds (Option 1) (Figure 2-6d) shows Heavy Duty Access Track across the scheduled monument. While this would be removed at the end of the construction the effects on the significance of the monument would be permanent.* *If Option 1 is chosen then alternative track arrangements should be identified and the route moved to areas with lower impact on heritage assets.*	**oAMS [EN010141/DR/7.15]** and the **outline Construction Environmental Management Plan (oCEMP) [EN010141/DR/7.3]**. Details of the construction, use and removal of the proposed temporary access track across the scheduled monument are presented within the **oAMS [EN010141/DR/7.15]**. The 'Option 1' substation location (in Site C) is not being taken forward.
Historic England – PEIR Feedback (October 2024)	*6.7.23 Historic England welcomes commitments to providing enhancements to historic environment through community engagement, research and popularisation of heritage information.* *We recommend that crime prevention strategy is also considered as part of the enhancement measures.*	An **oHES [EN010141/DR/7.16]**, has been produced which contains measures for making a positive contribution to the historic environment. These measures

Consultee	Summary of Comments	Response to Consultation
	The details of the proposed enhancement measures should be specified in the ES….	are also presented in Section 6.9 of this chapter.
Historic England – PEIR Feedback (October 2024)	*6.8.3 We note that the creation of new green infrastructure across the Scheme has been described as having no directly impact upon cultural heritage remains (both known and unknown). We do not agree with this statement as hedge and tree planting could cause permanent and detrimental impacts on buried archaeological remains.* *We would recommend that assessment of the proposed tree and hedge planting work refers to the Appendix A of the document 'Assessing the Impact of Tree Roots on Archaeology (2024): https://knowledge.oxfordarchaeology.com/library/12564.* *This document states that the choice of tree types and the location of planting needs to be considered carefully on a site-by-site basis.* *We recommend that the green infrastructure plan is re-assessed when full baseline heritage information becomes available. The plan should be then amended as necessary to avoid unnecessary impacts on the heritage assets.*	The archaeological baseline presented in **ES Vol 2 Appendix 6-2 [EN010141/DR/6.2]** and summarised in Section 6.6 of this chapter have been updated to include reference to the completed additional areas of geophysical survey and fieldwork. This updated information has been used to inform the design and the mitigation strategy (inclusive of areas of no impact) related to the potential for direct and indirect impacts on potential archaeological remains, as is presented in the **oAMS [EN010141/DR/7.15]** and Sections 6.7 and 6.9 of this chapter.
Historic England – PEIR Feedback (October 2024)	*Tables 6.8; 6.9; 6.11; 6.13 Description of Direct Impacts during construction phase.* *We note that the 'Description of impacts' column omitted impacts resulting from trenching for low voltage cables and other cables connecting transformers, inverters, etc. We consider this omission to be a mistake. We recommend that these direct impacts are included in the assessment.*	The assessment tables within this chapter have been updated to include trenching for low voltage cables and other cables connecting transformers, inverters, etc.

Consultee	Summary of Comments	Response to Consultation
	In the areas of archaeological sensitivity alternative solutions to excavation of Trenches should be explored. Details of any engineering solutions should be presented in ES. If engineering solutions are not possible then clear and convincing justification should be provided. *We note that 'Predicted Magnitude of Impact' column states that predicted effects of hedge, tree and woodland planting would be negligible. We disagree with this assumption. As previously advised hedge, tree, and woodland planting could cause permanent and detrimental impacts on buried archaeological remains.* *We recommend that impact of planting and other green infrastructure is reassessed, when full heritage baseline information becomes available.* *An appropriate mitigation should then be devised. Woodland, tree and hedge planting should be avoided on areas of archaeological sensitivity if possible.* *We note that several heritage assets would be impacted by construction of temporary construction compounds. The impacted assets include group of geophysical anomalies no. 41a (heritage asset no. 210) within site A; and group of geophysical anomalies no. 43a within site C. Both are assigned medium importance at this stage. The impacts caused by construction of the compounds would be permanent.* *We recommend that the impacts should be reassessed when full heritage baseline information becomes available. Alternative locations for the compounds impacting on heritage assets of medium (or higher) importance are explored. If any of the temporary compounds cannot be moved to avoid causing impact on heritage assets, then clear and convincing justification of the location choice should be provided in the ES.*	The archaeological baseline presented in **ES Vol 2 Appendix 6-2 [EN010141/DR/6.2]** and summarised in Section 6.6 of this chapter have been updated to include reference to the completed additional areas of geophysical survey and fieldwork. This updated information has been used to inform the design (including temporary construction compound locations) and the mitigation strategy related to the potential for direct and indirect impacts on potential archaeological remains, as is presented in the **oAMS [EN010141/DR/7.15]** and Sections 6.7 and 6.9 of this chapter.
Historic England – PEIR Feedback (October 2024)	*6.8.10, 6.8.15, 6.8.20, 6.8.24 and 6.8.33 We support the commitment to review the assets significance and predicted level of direct impact to archaeological remains within the Scheme on completion of the trial Trench evaluation. An iterative approach will help develop a realistic assessment of the sites potential and the possible levels of impact as more information becomes available.*	The archaeological baseline presented in **ES Vol 2 Appendix 6-2 [EN010141/DR/6.2]** and summarised in Section 6.6 of this chapter have been updated to

Consultee	Summary of Comments	Response to Consultation
	All significance and impact values for non-designated assets should effectively be treated as provisional until these assets have been effectively characterised.	include reference to the completed additional areas of geophysical survey and fieldwork. The assessment of archaeological potential presented in Section 6.6 of this chapter has been updated to include reference to the completed works.
Historic England – PEIR Feedback (October 2024)	*6.8.19; 6.8.28; 6.8.37 Historic England notes that geophysical survey work is currently being carried out within the corridors connecting Site B to C, Site C to D, and Site D to St Neots Substation. We welcome the commitment to include the results in the submission of the application to the DCO.* *We would like to highlight that trial Trench evaluation would be necessary to ground truth the results of geophysical survey and provide adequate heritage baseline information for the ES. All significance values for non-designated asset will effectively be provisional until these assets have been effectively characterised.*	The archaeological baseline presented in summarised in Section 6.6 of this chapter has been updated to include reference to the completed additional areas of geophysical survey and fieldwork. The **oAMS [EN010141/DR/7.15]** sets out the approach that will be taken to further post-consent archaeological investigation.
Historic England – PEIR Feedback (October 2024)	*6.8.35 It is stated that the cable route would mostly be lain using open Trench approaches, but that HDD would be used in identified Areas of Archaeological Constraint (AACs). We support this approach; however, we would like to highlight that intrusive investigations would need to be undertaken first in order to understand the depths of archaeology in these areas, and therefore how deep the cables would need to buried to avoid significant impacts on the buried archaeological remains.*	The **oAMS [EN010141/DR/7.15]** sets out the approach that will be taken to further post-consent archaeological investigation. A methodology for HDD is provided in the oAMS, and additional mitigation measures set out

Consultee	Summary of Comments	Response to Consultation
		in the **outline Construction Environmental Management Plan [EN010141/DR/7.3]**.
Historic England – PEIR Feedback (October 2024)	*6.8.39 We note that changes to groundwater and compression has been described as indirect impacts. We consider that the severity of these impacts is comparable to 'direct impacts'. Therefore, we recommend that these impacts are assessed in the same manner as direct impacts, especially as some of the 'indirect' impacts could cause negative effects on the significance of the designated heritage assets, such as Roman Small Town to the south of Great Staughton.* *6.8.40 We are pleased to see that the hydrology team has considered the potential impacts to heritage and that scour, or other significant hydrological impacts are not anticipated.*	Indirect physical impacts are defined in the Environmental Impact Assessment Handbook as occurring *'where the fabric is lost or preserved as a result of the proposal even though the asset lies at a remove from the proposal. Examples include damage to walls as a result of vibration from piling operations or blasting, the degradation of waterlogged deposits as a result of dewatering and changes in currents resulting in increased/decreased erosion. Such impacts may result at any stage of development and are likely to be permanent'*[22]. As such the discussion in relation to the potential for impacts relating to groundwater and compression have been retained

Consultee	Summary of Comments	Response to Consultation
		within the section of the ES chapter detailing indirect physical impacts. The potential for indirect physical impacts is considered in Section 6.8 of this chapter. The potential for compression arising from the proposed development has been considered. Outside the scheduled monument and the AACs the potential compression impacts on any archaeological remains are not anticipated to exceed the direct physical impacts resulting from construction works. The construction access roads and permanent access roads are designed to reduce the potential for compression, with details of these elements provided in Section 7.3 of the **oAMS [EN010141/DR/7.15]**. Liaison with the hydrology team indicates that as there are no significant excavations or underground obstructions that could affect

Consultee	Summary of Comments	Response to Consultation
		groundwater movement, it is not anticipated that there would be any significant impacts. The full hydrology assessment for the Scheme is outlined in **ES Vol 1 Chapter 8 [EN010141/DR/6.1].**
Historic England – PEIR Feedback (October 2024)	*6.8.55; 6.8.57 The impacts on the setting of a scheduled monument, Roman Small Town to the south of Great Staughton, have been assessed as either minor (Option 1) or moderate (Option 2). The level of impact would depend on the choice of location for the BESS and substation.* *We note that no visual mitigation has been specified for the parts of the site C adjacent to the Roman Town (as shown on Illustrative Environmental Masterplan).We consider that it is an oversight. Additional screening, inclusion of buffers, or creation of vistas for example, could reduce impact of the project on the scheduled monument.* *We recommend that ways to mitigate setting impacts within site C are reassessed and included in the design of the project following decision on the location of the BESS and East Park substation. The visual mitigation should take into account finalised heritage baseline information (including trial Trench evaluation and analysis of additional, heritage specific viewpoints).* *We would be happy to engage in further discussions and provide additional advice on this issue prior to submission of the DCO application.*	The Applicant has assessed the impact of the Scheme upon the setting of the *scheduled monument, Roman Small Town to the south of Great Staughton.* The BESS and East Park substation has been located within Site D (as set out in **ES Vol 1 Chapter 3 [EN010141/DR/6.1]**) and the design of environmental enhancements and screening has been updated across the Scheme. The updated assessment of the potential for impacts on the setting of *Scheduled monument, Roman Small Town to the south of Great Staughton* has been produced as set out in Table 1

Consultee	Summary of Comments	Response to Consultation
		and Section 3 of **ES Vol 2 Appendix 6-4 [EN010141/DR/6.2]** and in Section 6.8 of this chapter.
Historic England – PEIR Feedback (October 2024	*6.9.1 We understand that additional archaeological investigation is currently ongoing to inform the ES. The work is being undertaken across the Scheme area in the form of additional geophysical survey and a trial Trench evaluation.* *We would recommend that results of trial Trench evaluation undertaken across cable corridors connecting sites A-D and the grid connection to St Neots Substation are also used for final assessment and preparation of the ES.* *6.9.4 We welcome inclusion of embedded mitigation measures in areas of archaeological significance. These measures include 'no dig solutions', revision of design and layout of the scheme, and preservation by record.* *We support use of these measures, but would need to see further details of the proposed solutions. We recommend that all the details (extent of the areas, specification of non-dig methods, etc.) are specified in the ES.* *We would expect to see an Outline WSI for the proposed investigations, submitted as part of the DCO application.*	The archaeological baseline summarised in Section 6.6 of this chapter has been updated to include reference to the completed additional areas of geophysical survey and fieldwork. This updated information has been used to inform the mitigation strategy (inclusive of areas of no impact and no dig solutions) related to the potential for direct and indirect impacts on potential archaeological remains as is presented in the **oAMS [EN010141/DR/7.15]** and Sections 6.7 and 6.9 of this chapter. The **oAMS [EN010141/DR/7.15]** sets out the approach that will be taken to further post-consent archaeological investigation.
Historic England –	*6.11.6 Historic England notes the report only identifies two listed buildings that would be*	The updated assessment of the

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PEIR Feedback (October 2024)	*significantly affected – namely Chadwell Farmhouse and Great Staughton Manor.* *Both buildings are grade II listed. Grade II listed buildings are however outside of the remit of historic England and we therefore recommend you take advice from the relevant Conservation Officers in the LPA.* *We would however wish to draw to your attention to the following Listed buildings, the settings of which we believe would be impacted due to their spatial relationship to the application site.* *These are:* *- The Church of All Saints, Little Staughton (grade I);* *- The Church of St Mary the Virgin, Keysoe (grade I)* *We believe that particular attention should be given to assessing the impact of the development upon these buildings. The likely effects should be clearly described with a clear narrative and illustrated by way of appropriate verified graphical material such as wireframe diagrams and photomontages of an appropriate scale and format.* *We also believe that the development is likely to impact upon south-easterly views from Great Staughton conservation area and recommend that a similar robust assessment is also conducted in this regard.*	potential for impacts on the Setting of designated heritage assets (including those noted in the comments) is presented within Table 1 and Section 3 of **Appendix 6-4 [EN010141/DR/6.2]** and in Paragraphs 6.8.47 to 6.8.61 of Chapter 6 of the ES. This updated assessment incorporates the findings of a landscape assessment with supporting visualisations which are presented in ES Vol 1 **Chapter 5: Landscape and Visual [EN010141/DR/6.1]** and views from nearby public access routes as presented in the **Design Approach Document [EN010141/DR/5.6]** which highlight the approach to avoiding impacts on the referenced churches.
Historic England – PEIR Feedback (October 2024)	*6.11.11 We welcome commitment to undertake further assessments of the historic environment before submission of the DCO application.* *We would recommend that results of trial Trench evaluation undertaken across cable corridors connecting sites A-D and the grid connection to St*	The archaeological baseline presented in summarised in Section 6.6 of this chapter has been updated to include

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	Neots Substation are also used for final assessment and preparation of the ES.	reference to the completed additional areas of geophysical survey and fieldwork. The **oAMS [EN010141/DR/7.15]** sets out the approach that will be taken to further post-consent archaeological investigation.
Historic England – PEIR Feedback (October 2024)	*Volume 2, Appendix 6-5: Archaeological Geophysical Survey Report* *This document presents the findings of a magnetic gradiometry survey carried out over the proposed Scheme area. It was noted that the surveys were carried out between November 2022 and October 2023 (Section 5.1). A statement should be included in the report about if the weather impacted the work at all, such as making some areas of the site inaccessible.* *It is stated that the survey was carried out using a Bartington Cart system (Section 5.5) and a Sensys MAGNETO ® MXPDA push cart (Section 5.10). It would be useful to know if any areas investigated during the survey were inaccessible to the carts and if alternative, hand-held options were used. It would also be useful to include an explanation of why two different systems were used to survey the site.*	The updated archaeological geophysical survey report (including the requested additional information) for the completed elements of the geophysics is included as **ES Vol 2 Appendix 6-5 [EN010141/DR/6.2]**.
Historic England – PEIR Feedback (October 2024)	*Volume 2, Appendix 6-6: Archaeological Targeted Trial Trench Evaluation* *….* *We understand that this report is in draft form and has not yet been approved by the curator. Despite limitations of this intervention the report is invaluable, as no other intrusive archaeological work has been undertaken within the extent of the Roman town.* *Section 4.1 stated in that the finds assemblage and spot dates has not yet been carried out, but a commitment has been made to complete this work for the final report.*	The interim archaeological trial trenching reports for the fieldwork are included as **ES Vol 2 Appendix 6-6 to 6-9 [EN010141/DR/6.2]**.

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	We note that there was no discussion in the report about whether environmental samples were recovered during the evaluation. Information provided by analysis of the samples would help understand the palaeoenvironmental potential of the site and assess any potential impacts of the scheme. The sample information should be provided in the final report.	
BBC Archaeology Officer - Geoff Sanders PEIR Feedback (October 2024)	….. *4. Work on the agreed archaeological evaluation strategy has been progressing with a programme of geophysical survey and archaeological trial trenching. To date it should be noted that the trenching has only commenced within the Cambridgeshire parts of the scheme. Currently the proposed approach to evaluating the cable routes and the grid connection is to undertake further geophysical survey, other than in §6.4.6 no clear commitment has been made to allow trenching in these areas. In order to provide sufficient information to inform a suitable mitigation strategy that needs to be submitted with the DCO application BBC consider that intrusive trial trenching based upon the results of the geophysical survey in the cable routes and grid connection will be required.*	The interim archaeological trial trenching reports for the fieldwork (including within Sites A and B within BBC's administrative area) are included as **ES Vol 2 Appendix 6-6 to 6-9 [EN010141/DR/6.2]**. There are areas within BBC's administrative area that have not been accessible for trial trenching prior to the submission of the DCO. These principally include two fields within Site B (sub-areas B25 and B29) as described in **ES Vol 2 Appendix 6-7 [EN010141/DR/6.2]**. The **oAMS [EN010141/DR/7.15]** sets out the approach that will be taken to further post-consent archaeological investigation.

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BBC Archaeology Officer - Geoff Sanders PEIR Feedback (October 2024)	*5. The PEIR identifies three potential mitigation options in §6.9.4 comprising 'no dig' construction, preservation by record (excavation), and revisions to the design and layout of the Development to avoid impacts. In theory these are potentially acceptable options, however they will need to be informed by the completed evaluation results. BBC have some concerns over 'no dig' solutions as in many instances these still require a reasonable amount of excavation i.e. for cabling, transformers, inverters and other associated infrastructure. BBC also note that while §6.9.4 sets out these three approaches to mitigation the 'preferred' option appears to be 'no dig' construction using concrete feet for the panels as set out in the final design principle in §2.4.12 and again in §6.7.8 as well as elsewhere in the PEIR. The 'no dig' option may not be appropriate in all archaeological areas. The detailed mitigation strategy based upon the results of the archaeological evaluation should be agreed with the relevant Host Authority in advance of the DCO.* *6. With regards to §6.7.4, if green infrastructure is proposed in areas that have not been subject to archaeological evaluation or in areas proposed for preservation in situ then it will need to be designed in such a way as to achieve minimal ground disturbance.*	The interim archaeological trial trenching reports for the fieldwork are included as **ES Vol 2 Appendix 6-6 to 6-9 [EN010141/DR/6.2]**. This updated information has been used to inform the mitigation strategy (inclusive of areas of no impact and no dig solutions) related to the potential for direct and indirect impacts on potential archaeological remains as is presented in the **oAMS [EN010141/DR/7.15]** and Sections 6.7 and 6.9 of this chapter. The **oAMS [EN010141/DR/7.15]** sets out the approach that will be taken to further post-consent archaeological investigation.
BBC Archaeology Officer - Geoff Sanders PEIR Feedback (October 2024)	*7. To date little archaeological research has been undertaken on the potential impact that decommissioning of solar farms can have on underlying archaeological remains that have been 'preserved' within their area. BBC note that §6.8.61 states that potential harm to buried archaeological features from the removal of piles will be discussed with stakeholders, further to this an assumption is made regarding the removal of additional infrastructure that disturbance will be no greater than construction. BBC would like to*	Further information regarding the approach to mitigating archaeological impacts during the decommissioning phase of the project are set out in Section 7.5 the **oAMS**

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	see far more detail than that which has been provided to date in Chapter 6 of the PEIR or the outline Decommissioning Environmental Management Plan (DEMP), further assessment of the potential impacts on archaeological remains at this stage should be provided together with an appropriate methodology designed so as to minimise these impacts. Proceeding on the basis of 'assumptions' is not acceptable.	**[EN010141/DR/7.15]**. Further environmental mitigation measures for the decommissioning phase of the Scheme are also set out in the **outline Decommissioning Environmental Management Plan [EN010141/DR/7.5]**.
BBC Archaeology Officer - Geoff Sanders PEIR Feedback (October 2024)	*8. Table 6.8 will require updating following completion of the evaluation works. Woodland planting should be avoided over areas containing archaeological features unless mitigation measures are in place. Planting along existing boundaries excepted.* *9. Table 6.9 will require updating following completion of the evaluation works. Woodland planting should be avoided over areas containing archaeological features unless mitigation measures are in place. Planting along existing boundaries excepted.* *10. Table 6.10 should be updated following completion of the evaluation works.* …… *12. Table 6.14 will require updating following completion of the evaluation works.*	The archaeological baseline presented in Section 6.6 of this chapter has been updated to include reference to the completed additional areas of geophysical survey and fieldwork. This updated information has been used to inform the assessments of potential impact and design, and the mitigation strategy related to the potential for direct and indirect impacts on potential archaeological remains as is presented in the **oAMS [EN010141/DR/7.15]**.
BBC Archaeology	*13. With regards to §6.11.11, BBC have concerns with the first bullet point that notes completion of the geophysical survey 'so far as possible' and*	The interim archaeological trial trenching reports

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Officer - Geoff Sanders PEIR Feedback (October 2024)	*the second bullet point that notes completion of the archaeological trial trenching 'so far as possible'. BBC expect this work to be completed prior to submission and further to this additional trial trenching is likely to be required in the cable corridors and grid connection.* *14.Given the lifespan of the proposed Development, BBC expect the archaeological mitigation strategy or the individual site WSIs to include ongoing management proposals so that areas where archaeological remains have been preserved are recognised in the event of maintenance requiring additional groundworks being identified during the Operational Phase. Provision should be made for these works to be mitigated if necessary.*	and geophysical survey report for the completed elements of the fieldwork and survey are included as **ES Vol 2 Appendix 6-6 to 6-9 [EN010141/DR/6.2]**. The **oAMS [EN010141/DR/7.15]** sets out the approach that will be taken to further post-consent archaeological investigation. During the operational phase of the Scheme there is not expected to be any requirement for excavation of additional areas that will not have already been worked during the construction phase.
BBC Archaeology Officer - Geoff Sanders PEIR Feedback (October 2024)	*15. The illustrative masterplan (PEIR Figure 2-2) shows the indicative locations of centralised inverters and transformers as well as proposed construction compounds - are these locations flexible so that they can be moved to avoid areas of significant archaeology? BBC note the plan is illustrative and would not expect it to be finalised until the completion of the archaeological evaluation.* *16. In summary, the assessment of the archaeological potential of the proposal site is still at an early stage. The archaeological evaluation work should be completed ahead of the DCO submission. The results of the archaeological evaluation should be used to inform a detailed archaeological mitigation strategy for the scheme*	The interim archaeological trial trenching reports and geophysical survey report for the completed elements of the fieldwork and survey are included as **ES Vol 2 Appendix 6-6 to 6-9 [EN010141/DR/6.2]**. This updated information has

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	that will ideally be agreed with the relevant Host Authority ahead of the submission of the DCO. Dependent on the results of the evaluation the illustrative masterplan provided will also require updating to reflect necessary design changes. Further information is also required regarding potential impacts at the decommissioning stage of the development.	been used to inform the assessments of archaeological potential. The design and mitigation strategy related to the potential for direct and indirect impacts on potential archaeological remains is presented in the **oAMS [EN010141/DR/7.15]** and Sections 6.7 and 6.9 of this chapter. The **oAMS [EN010141/DR/7.15]** sets out the approach that will be taken to further post-consent archaeological investigation.
BBC Archaeology Officer - Jack Watkins PEIR Feedback (October 2024)	*3. The PEIR outlines the likely setting impacts on heritage assets in Document 6-4. The Historic Environment Team undertook a number of site visits in March 2024 relating to the proposed development, as well as further site visits in October 2024 following the submission of the PEIR. In most instances, BBC agree with the conclusions reached in the Settings Assessment Table in section 2 of the DBA. However, Officers wish to raise the following points relating to the Development:* *a) The Church of All Saints, Little Staughton (Grade I) is located on a ridge overlooking the wider landscape to the northwest, north and northeast – Pevsner describes it as a "dramatic picture" from this perspective. Due to its four-stage 15th century tower with 19th century spire (rebuilt 1910) and its prominent, exposed location, the church's setting is extensive and it is clear that the church was originally designed to dominate the local landscape. As noted in the*	The updated assessment of the potential for impacts on the Setting of designated heritage assets (including those noted in the comments) is presented within Table 1 and Section 3 of **Appendix 6-4 [EN010141/DR/6.2]** and in Paragraphs 6.8.47 and 6.8.61 of Chapter 6 of the ES.

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	DBA, this includes the proposal Site where there would be 'clear intervisibility' not only from within the churchyard and immediate setting of the church (see PEIR Figures 5-55, 5-56 and 5-57), but also in a number of medium and long distance views to the north looking back towards the church; some of which include clear views of the nave and chancel as well as the tower (so that one is able to fully appreciate its significance). The Site's rural character makes a strong contribution to the way in which the asset is experienced and understood – it reflects its original agricultural setting and its historic ties to the wider landscape. Views from within and around the site including from mature planting and rooftops) as well as St Peter's Church in Pertenhall to the west. Such views provide evidence of a mature planting and rooftops) as well as St Peter's Church in Pertenhall to the west. Such views provide evidence of a historic, rural landscape and All Saints Church's place within it. The effect of placing large swathes of solar panels orientated southwards within the Site would be to erode the rural character of the landscape and introduce conspicuous and incongruous development in its place that would be highly visible given the change in levels. It would also take away from one's experience to the north where the relationship between the Church, Little Staughton and the wider landscape would be disrupted. The DBA suggests the Development would not affect the Church's prominence within the landscape, but from different perspectives the panels would draw undue attention away from the Church and its landmark value. Elements of its rural setting would be retained including immediate fields to the north and northeast, and there would be no direct impact on the fabric of the listed building. However, given the strong contribution setting makes to significance, of which the site forms a significant element, the Operational Phase would likely result in a moderate level of less than substantial harm to the significance of the Church, subject to full details. This would constitute a 'moderate significant effect' in EIA terms based on Table 11.6 of the Scoping Report.	This updated assessment incorporates the findings of a landscape assessment with supporting visualisations which are presented ES Vol 1 **Chapter 5: Landscape and Visual [EN010141/DR/6.1]** and views from nearby public access routes as presented in the **Design Approach Document [EN010141/DR/5.6]** which highlight the approach to avoiding impacts on the referenced church.
BBC Archaeology	*3b) Glint and glare – this does not seem to be considered as a potential impact on heritage assets. For example, there are no 'glint and glare' receptors located within the churchyard at All*	Specific assessment of the potential effects of *'Glint and Glare'*

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Officer - Jack Watkins PEIR Feedback (October 2024)	*Saints, Little Staughton, including from one apparent designed view from north of the church (where vegetation has been cleared in line with a bench). It is suggested that this should be considered in Appendix 5-6.*	have been incorporated in to the assessment presented within **ES Vol 2 Appendix 5-6 [EN010141/DR/6.2]**, as well as Table 1 and Section 3 of **ES Vol 2 Appendix 6-4 [EN010141/DR/6.2]**.
BBC Archaeology Officer - Jack Watkins PEIR Feedback (October 2024)	*3c. The Setting Assessment Table identifies a number of circumstances in which an asset of low 'relative sensitivity' and a low 'magnitude of impact' would occur, a 'neutral impact' from the Operational Phase would arise. BBC appreciate that the assessment takes into account a large number of assets and the methodology attempts to provide a proportionate approach to assessing the likely impact of the development (and whether such impacts would result in 'significant effects' in EIA terms). 'Relative Sensitivity' was defined in §11.6.10 of the Scoping Report as an asset's 'capacity to retain its ability to contribute to our understanding and appreciation of the past in the face of changes to its setting'. In a number of cases, especially relating to Grade II listed farmhouses and agricultural buildings, BBC are of the view that the relative sensitivity is likely to be higher than the 'low' level typically attributed in the Table where their rural setting has been largely retained. This is because such assets tend to draw strongly upon the rural landscape as part of their significance, and as such are likely to warrant a 'medium' or 'high' relative sensitivity. A low magnitude of impact in that instance is likely to translate to a low or minor level of less than substantial harm. Whilst not likely to be a 'significant effect' in EIA terms, such effects still need to be identified and the harm weighed accordingly against the public benefits flowing from the development as per §5.9.32 of EN-1.*	The updated assessment of the potential for impacts on the setting of heritage assets is presented within Table 1 and Section 3 of **ES Vol 2 Appendix 6-4 [EN010141/DR/6.2]** and in Section 6.8 of this chapter.
BBC Archaeology Officer - Jack Watkins	*3d. It would be useful to include Tables 11.4, 11.5 and 11.6 found within the EIA Scoping Report as part of Methodology section of the DBA, in order*	The assessment methodology and tables are provided within Section 6.4 of this ES Chapter,

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PEIR Feedback (October 2024)	*to provide context for the Settings Assessment Table.*	and in **ES Vol 2 Appendix 6-2 [EN010141/DR/6.2]**.
BBC Archaeology Officer - Jack Watkins PEIR Feedback (October 2024)	*3e) There is no real discussion relating to potential mitigation measures. The aim of any Development of this nature should be to identify adverse effects on heritage assets and seek to mitigate them as far as possible (particularly when 'significant effects' are identified). Whilst it is accepted that this currently appears to be a matter of disagreement between the Promotor and BBC, there are likely to be ways of mitigating the impact on All Saints Church further by through sensitive changes to the design and layout. If this is not possible – i.e. the amount of mitigation required would fundamentally compromise the aims of the Development, then this should be spelled out in the PIER in order to justify the harm caused to the asset.*	The updated assessment of the potential for impacts on the Setting of designated heritage assets (including those noted in the comments) is presented within Table 1 and Section 3 of **Appendix 6-4 [EN010141/DR/6.2]** and in Paragraphs 6.8.47 to 6.8.61 of Chapter 6 of the ES. This updated assessment incorporates the consideration of views from nearby public access routes as presented in the **Design Approach Document [EN010141/DR/5.6]** which highlight the approach to avoiding impacts on the referenced church. Incorporated mitigation measures in relation to settings effects are presented in Section 6.7 of Chapter 6 of the ES.

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BBC Archaeology Officer - Jack Watkins PEIR Feedback (October 2024)	*4. In summary, BBC disagree with the findings of the PEIR in relation to the impact on All Saints Church, and whether or not a 'significant impact' is likely to arise. BBC would wish to see the ES explore potential ways of mitigating this impact. BBC note that the Settings Assessment Table has been provided without context and should be supported with the preamble provided in the Scoping Report. Though the table and the chosen methodology is effective in terms of identifying significant effects, there is concern that in a number of cases a degree of less than substantial harm may arise to a number of listed buildings where a neutral impact has been recorded.*	See responses to points 3a to 3d above.
Cambridgeshire County Council PEIR Feedback (October 2024)	*…… Geophysical survey is proposed for the cable routes linking sites B and C, sites C and D, and site D to the grid connection, but note trial trenching is not clearly proposed. It is CHET's position that there are areas (particularly between site C and D) where national significant archaeology may be present, and that some level of intrusive trenching is needed to inform the DCO.* *Three approaches to mitigating areas of significant archaeology are proposed, as per PEIR para 6.9.4 – the utility of each of these techniques depends on the nature, depth and significance of archaeological remains in a given area, and the potential impact on those remains.* *One particular technique appears to be preferred in the non-specialist parts of the PEIR (e.g. para 2.4.12), however this technique (mounting of panels on concrete slabs/shoes) is only appropriate in certain circumstances, and only given further information regarding related impacts (e.g. cabling, inverters, transformers, access roads) in those areas.*	The interim archaeological trial trenching reports and geophysical survey report for the completed elements of the fieldwork and survey are included as **ES Vol 2 Appendix 6-6 to 6-9 [EN010141/DR/6.2]**. This updated information has been used to inform the assessments of archaeological potential. The design and mitigation strategy related to the potential for direct and indirect impacts on potential archaeological remains is presented in the **oAMS [EN010141/DR/7.1**

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		5] and Sections 6.7 and 6.9 of this chapter. The **oAMS [EN010141/DR/7.15]** sets out the approach that will be taken to further post-consent archaeological investigation.
Cambridgeshire County Council PEIR Feedback (October 2024)	*It is noted a Decommissioning Environmental Management Plan (DEMP) is proposed for submission. However, the Outline DEMP provided here (Appendix 2-5), and paras. 2.7.5 and 6.8.61 of the PEIR, state that decommissioning impacts are 'assumed' to be less than or no more extensive than construction. This assumption does not provide reassurance of the potential impact of removing piles or below ground cabling in the future. Appropriate detail needs to be included in the DEMP to fully assess the potential impact of decommissioning on below ground archaeological remains.*	The approach to mitigating archaeological impacts at each stage of the project are set out in the **oAMS [EN010141/DR/7.15]**.
Cambridgeshire County Council PEIR Feedback (October 2024	*Opinions are sought on whether the BESS and substation should be within Site C or D. The potential for significant archaeological remains is considerably higher within Site C, and we would provisionally recommend Site D. This may change pending the results of ongoing trial trenching, however.*	The BESS and East Park substation has been located within Site D (as set out in **ES Vol 1 Chapter 3 [EN010141/DR/6.1]**.
Cambridgeshire County Council PEIR Feedback (October 2024)	*A cable route is proposed to cross the newly scheduled Roman town. It would be greatly preferable to re-route this, away from the nationally significant archaeology. I'm aware that this will be drilled at considerable depth, and therefore unlikely to have significant physical impact on the monument, but to fully judge its appropriateness or otherwise further information regarding the technique and depth is needed. Equally, a temporary access road is proposed to cross the scheduled monument. While the information provided suggest that there will be zero below ground impact, more information is needed on what damage might be caused by*	Details of the proposed HDD method, including location of the launch and receiving pits and depth are detailed within the **oAMS [EN010141/DR/7.15]**. Mitigation measures potential for bentonite slurry

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	compression from a volume of heavy vehicles using this road.	outbreak are provided in the **oAMS [EN010141/DR/7.15]** and the **outline Construction Environmental Management Plan (oCEMP) [EN010141/DR/7.3]**. Details of the construction, use and removal of the proposed temporary access track across the scheduled monument are presented within the **oAMS [EN010141/DR/7.15]**.
Cambridgeshire County Council PEIR Feedback (October 2024)	*6.4.6 – It is stated that trial trenching for the grid connections will follow 'in due course' Cambridgeshire Conty Council would like further engagement with the promoter as to the timescale for this to ensure the information is available at the appropriate stage of planning?* *6.6.32 – Cambridgeshire County Council has concerns that the potential for nationally significant Roman remains associated with the Roman town is not appropriately assessed for the cable corridor from Site C to D which has high potential for schedulable remains.* *6.7.8 - The appropriateness of the techniques in PEIR Volume 3 Figure 2-3a depends entirely on the depth, nature, and significance of the archaeological remains within the Area of Archaeological Constraint (AAC). Other potential mitigation measures include removing it entirely from development or mitigation by record via archaeological excavation. We do not support 'non-intrusive' construction techniques as the only mitigation. The impact of cabling, inverters, transformers, access tracks within AACs should be considered.*	The interim archaeological trial trenching reports and geophysical survey report for the completed elements of the fieldwork and survey are included as **ES Vol 2 Appendix 6-6 to 6-9 [EN010141/DR/6.2]**. This updated information has been used to inform the assessments of archaeological potential. The design and mitigation strategy related to the potential for direct and indirect impacts on

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		potential archaeological remains is presented in the **oAMS [EN010141/DR/7.15]** and Sections 6.7 and 6.9 of this chapter. The **oAMS [EN010141/DR/7.15]** sets out the approach that will be taken to further post-consent archaeological investigation.
Cambridgeshire County Council PEIR Feedback (October 2024)	*6.7.13 – The temporary access track across the scheduled monument will have to have absolutely no below ground impact and will need permission from Historic England.*	Details of the construction, use and removal of the proposed temporary access track across the scheduled monument are presented within the **oAMS [EN010141/DR/7.15]**.
Cambridgeshire County Council PEIR Feedback (October 2024)	*6.7.14 – is there an indicative depth that is considered appropriate for directional drilling beneath the Scheduled Monument? The full depth of the remains within the town was only determined within the easternmost Trench in the targeted evaluation and is closest to the proposed cable route.*	An assessment of appropriate depth for the proposed HDD method has been undertaken which includes a review of the trenching results from Sites C and D and comparable archaeological activity in the wider region. This and details of the proposed HDD method, including location of the launch and receiving pits and

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		depth are detailed within the **oAMS [EN010141/DR/7.15]**. Mitigation measures potential for bentonite slurry outbreak are provided in the **oAMS [EN010141/DR/7.15]** and the **outline Construction Environmental Management Plan (oCEMP) [EN010141/DR/7.3]**.
Cambridgeshire County Council PEIR Feedback (October 2024)	*Table 6.11 Likely Direct Effects within Site C – Whilst broadly agreeing with the assessment of impact and significance of impact in the table, the full significance of impact is pending results of the ongoing trial trenching.* *6.8.28 –Intrusive evaluation is also strongly recommended within the Site C to Site D corridor.* *…….* *6.11.11 - There are potential areas of significant archaeological impact along the proposed cable routes - these should be Trenched to inform the application. If cable routes are not to be Trenched the reason for this will require considerable support in the application documentation.*	The interim archaeological trial trenching reports and geophysical survey report for the completed elements of the fieldwork and survey are included as **ES Vol 2 Appendix 6-6 to 6-9 [EN010141/DR/6.2]**. This updated information has been used to inform the assessments of potential (including within Site C) and the mitigation strategy related to the potential for direct and indirect impacts on potential archaeological remains as is presented in the **oAMS [EN010141/DR/7.1**

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		5] and Sections 6.7 and 6.9 of this chapter. The **oAMS [EN010141/DR/7.15]** sets out the approach that will be taken to further post-consent archaeological investigation.
Cambridgeshire County Council PEIR Feedback (October 2024)	*6.8.35 – Areas of Archaeological Constraint are proposed to be identified post-determination. Cambridgeshire County Council would like to see potential EIA-significant impacts identified pre-determination?* *Table 6.14 – It is noted the first six items in this table, and the last, could involve impacts that are significant in EIA terms, pending evaluation.*	The interim archaeological trial trenching reports and geophysical survey report for the completed elements of the fieldwork and survey are included as **ES Vol 2 Appendix 6-6 to 6-9 [EN010141/DR/6.2]**. This updated information has been used to inform the assessments of potential impact and the mitigation strategy related to the potential for direct and indirect impacts on potential archaeological remains as is presented in the **oAMS [EN010141/DR/7.15]** and Sections 6.7 and 6.9 of this chapter. Forty-two AACs have been identified and are presented in

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		Section 6.1 of the **oAMS [EN010141/DR/7.15].** It is anticipated that the final number, size and layout of the AACs will be subject to change dependant on the results of ongoing investigations within Sites B (sub-areas B25 and B29) and D (sub-area D02) as well as future investigation within the cable connection routes and grid connection route and established via consultation with BBHET and CHET.
Cambridgeshire County Council PEIR Feedback (October 2024)	*6.8.61 - The extent of Areas of Archaeological Constraint (AACs) will depend on likely below impact within areas proposed for piled solar arrays. This includes the extent and magnitude of impact proposed during decommissioning. Detail regarding the removal of piling and other below ground infrastructure should be within the DEMP accompanying the application, because there is no guarantee that this would not exceed the impact of their installation/construction.* …… *6.10.7 – More information is needed regarding decommissioning impacts here.*	The approach to mitigating archaeological impacts at each stage of the project are set out in the **oAMS [EN010141/DR/7.15]**.
Cambridgeshire County Council PEIR Feedback (October 2024)	*Outline Construction Environmental Management Plan (Appendix 2-3)* *2.5.8 & 2.5.9 – Construction compounds will have a major impact on any below ground archaeological remains in the area.*	The archaeological baseline presented in Section 6.6 of this chapter has been updated to include reference to the completed additional areas of

Consultee	Summary of Comments	Response to Consultation
	3.1.1 Cambridgeshire County Council supports the provision of an Archaeological Clerk of Works during operation. *Table 5.2 : Summary of the construction mitigation and management measures – Cultural Heritage – Cambridgeshire County Council recommends that Archaeological Management Plans (AMPs) are provided for areas to be preserved in situ, while Written Scheme of Investigation (WSIs) are used for those areas where archaeological investigation is needed. The OCEMP has a clear preference for preservation in situ via the foundation design proposed in PEIR Vol 3 Fig 2-3a. We only support this in certain circumstances, and the other mitigation options listed in PEIR para 6.9.4 are very likely to be needed.*	geophysical survey and fieldwork. This updated information has been used to inform the mitigation strategy (inclusive of areas of no impact and no dig solutions) related to the potential for direct and indirect impacts on potential archaeological remains as is presented in the **oAMS [EN010141/DR/7.15]** and Sections 6.7 and 6.9 of this chapter. The approach to mitigating archaeological impacts at each stage of the project are set out in the **oAMS [EN010141/DR/7.15]**.
Cambridgeshire County Council PEIR Feedback (October 2024)	*Outline Decommissioning Environmental Management Plan (ODEMP) (Appendix 2-5)* *2.4.4 – How will piles be removed? Incorrect removal could conceivably have major impact on archaeological remains.* *2.4.5 – How will care be taken not to impact on archaeology. Measures to mitigate the risk of damage needs to be included in the DEMP.* *Table 5.2 – It is noted that careful removal of infrastructure within Areas of Archaeological Constraint (AACs) is proposed. Details of how this will be monitored, for example by the Archaeological Clerk of Works, would be welcome. Furthermore, details for areas outside AACs? If decommissioning is likely to cause major below ground impacts even in areas not*	Further information regarding the approach to mitigating archaeological impacts during the decommissioning phase of the project are set out in Section 7.5 of the **oAMS [EN010141/DR/7.15]**. Further environmental mitigation measures for the

Consultee	Summary of Comments	Response to Consultation
	originally proposed to be AACs, then the boundaries to AACs may have to take in more marginally significant archaeology.	decommissioning phase of the Scheme are also set out in the **outline Decommissioning Environmental Management Plan [EN010141/DR/7.5]**.
Huntingdonshire District Council	…. *The removal of solar arrays from the site of the new scheduled monument has created a green buffer to the south of the Great Staughton and Staughton Highway Conservation Areas which has helped to alleviate the potential impacts on their settings. Solar arrays and associated infrastructure will be visible in longer distance views as the land rises to the south of the conservation areas but the impact of this on the settings of those heritage assets is likely to be modest.* *The extension of Site C to the west will have a greater impact on the setting to Staughton Manor and Garden Farmhouse (both Grade II listed) but this is likely to be mitigated over time by planting; any harm to the significance of these heritage assets should be justified but the harm is likely to be less than substantial."* *HDC is not the statutory consultee for archaeology so defers to the comments provided by the Cambridgeshire Historic Environment Team as part of Cambridgeshire County Council's reply. We support the request that further trial trenching is undertaken within appropriate timescales in order to understand the position and noting the significant find in relation to the new Scheduled site, and the concern in relation to cable corridor from Site C to D.* *HDC defers to Historic England in terms of impacts of the proposal upon Scheduled Monuments (and their setting).*	The BESS and East Park substation has been located within Site D (as set out in **ES Vol 1 Chapter 3 [EN010141/DR/6.1]** which has further reduced the potential setting impacts upon the Staughton and Staughton Highway Conservation Areas. The approach to the design and layout of the Scheme is set out in the **Design Approach Document [EN010141/DR/5.6]**. The updated assessment of the potential for impacts on the setting of designated heritage assets (including those noted in the comments) is presented within Section 6.8 of this chapter. The interim archaeological trial

Consultee	Summary of Comments	Response to Consultation
		trenching reports for the fieldwork (including within Sites C and D within the HDC's administrative area) are included as **ES Vol 2 Appendix 6-6 to 6-9 [EN010141/DR/6.2]**. There are areas within HDC's administrative area which have not been accessible for trial trenching prior to the submission of the DCO. These principally include two fields within Site B (sub-areas B25 and B29) and one field within Site D (sub-area D02).

6.4 Assessment Methodology

Study Area

6.4.1 In order to assess the potential for significant effects on archaeological and cultural heritage assets resulting from the Scheme, the following study areas have been used:

i) A core study area which includes all land within the Order Limits which has been subject to assessment for potential direct effects. This study area was subject to a walkover survey and geophysical survey which has been used to identify known and potential archaeological and cultural heritage assets which may be directly affected by the Scheme.

ii) A 1 km study area for the identification of all known heritage assets and known previous archaeological interventions ('Events') in order to help predict whether any similar hitherto unknown archaeological remains are likely to survive within the site and thus be affected by the Scheme.

iii) A 3 km study area for the assessment of potential effects on the settings of all designated heritage assets including scheduled monuments, listed buildings, and conservation areas. It is noted that there are no registered parks and gardens, registered battlefields or world heritage sites within 3km of the Order Limits.

iv) Consultation with HE, BBHET and CHET agreed the scoping in of three additional designated heritage assets (grade I listed Church of St Leonard - Asset 985; grade II* listed Warren House - Asset 984; grade II listed Priory Cottage - Asset 983), beyond the 3 km study area.

Data Sources

6.4.2 The following data sources were consulted during preparation of this chapter and the desk-based assessment presented in **ES Volume 2 Appendix 6-2 [EN010141/DR/6.2]**:

- National Heritage List for England (NHLE)[23] data obtained August 2025;

- Cambridgeshire Historic Environment Record (HER) data originally obtained July 2022, updated search in February 2024;
- Bedford Borough Historic Environment Record (HER) data originally obtained July 2022, updated search in February 2024;
- Huntingdonshire Council[24] and Bedford Borough Council[25], for information relating to conservation areas within Huntingdonshire and Bedford Borough;
- Aerial Photographs and aerial photographic resources held by Historic England[26];
- Historic Maps held online and at Bedfordshire Archives;
- Bedfordshire Archives;
- 0.25-2m LiDAR data and imagery from the Environment Agency[27] and processed by AOC Archaeology Group;
- Geophysical survey reports for the Scheme produced by AOC: **ES Vol 2 Appendix 6-5 [EN010141/DR/6.2];**
- Trial trench survey reports for the Scheme produced by AOC: **ES Vol 2 Appendix 6-6 to 6-9 [EN010141/DR/6.2]**;
- Other online sources;
- A walkover survey undertaken between the 16th of July and 26th July 2022 and during the geophysical survey undertaken between November 2022 and December 2023; and
- Site visits to designated heritage assets and identified non-designated heritage buildings to assess the potential effects of the Scheme on their settings, undertaken in July 2022.

6.4.3 This data has been used to succinctly describe the baseline historic environment conditions (with a more detailed historic baseline presented in the desk-based assessment which forms **ES Vol 2 Appendix 6-2 [EN010141/DR/6.2]**) and enable the potential for direct effects upon known heritage assets within the Order Limits to be assessed. It is also used to establish the potential for hitherto unknown buried remains to survive within the Site, and thus potentially be affected. The data has also been used to

establish the baseline for potential effects upon the setting of heritage assets (both designated and non-designated) within the 3km study area and selected assets beyond the 3km study area, as described in Section 4.1 above.

6.4.4 This chapter has been supported by a zone of theoretical visibility (ZTV), which has been used to identify assets intervisible with the Scheme and/or where the Scheme would appear in key views to and from assets.

Assessment of Significance / Assessment Criteria

6.4.5 This sub-section sets out the methodology for assessing effects upon heritage assets both direct physical and setting impacts. It takes account of NPS EN-1[28] & NPS EN-3[29], NPPF[30], PPG[31] , Historic England's (HE) Good Practice Advice Note 3: The Setting of Heritage Assets[32], ICOMOS Burra Charter Article One[33] and Xi'an Declaration[34], DDCMS Principles for Selection of Listed Buildings[35] and Scheduled Monuments Policy Statements[36], and IEMA Guidelines for Environmental Impact Assessment[37]. The assessment has been produced in line with the CIfA Code of Conduct[38], Regulations of Professional Conduct[39]; and the CIfA Standards and Guidance for Historic Environment Desk Based Assessments[40], Standard and guidance for commissioning work or providing consultancy advice on archaeology and the historic environment[41].

6.4.6 The assessment distinguishes between the following terms: 'impact' and 'effect'. An impact is defined as a physical change to a heritage asset or its setting, whereas an effect refers to the significance of this impact, as defined by the interaction between the magnitude of impact and sensitivity of receptor (see sections below and Table 6.8). The first stage of the assessment involves establishing the importance of the heritage asset and assessing the sensitivity of the asset to change (impact). Using the illustrative proposed design and embedded mitigation measures for the Scheme and taking into account the design parameters set out in **ES Vol 1 Chapter 2 [EN010141/DR/6.1]**, an assessment of the impact magnitude is made and a judgement regarding the level and significance of effect is reached**.**

Criteria for assessing Importance and Relative Sensitivity

6.4.7 The definition of cultural significance is readily accepted by heritage professionals both in the UK and internationally and was first fully outlined in the Burra Charter, Article One of which identifies that 'cultural significance' or 'cultural heritage value' means aesthetic, historic, scientific, social or spiritual value for past, present or future generations[42]. This definition has since been adopted by heritage organisations around the world, including HE. NPS EN-1 defines the historic environment as including:

> *"all aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, landscaped and planted or managed flora"*
>
> *"Those elements of the historic environment that hold value to this and future generations because of their historic, archaeological, architectural or artistic interest are called 'heritage assets'. Heritage assets may be buildings, monuments, sites, places, areas or landscapes, or any combination of these. The sum of the heritage interests that a heritage asset holds is referred to as its significance. Significance derives not only from a heritage asset's physical presence, but also from its setting" [43]*

6.4.8 All heritage assets have some significance; however, some assets are judged to be more important than others. The level of that importance is, from a cultural resource management perspective, determined by establishing the asset's capacity to inform present or future generations about the past. In the case of many heritage assets their importance has already been established through the designation (i.e. scheduling, listing and register) processes applied by HE.

6.4.9 The rating of importance of heritage assets is first and foremost made in reference to their designation and to NPS EN-1[44], NPS EN-3[45] and the NPPF[46]. For non-designated assets, importance will be assigned based on

professional judgement and guided by the criteria presented in Table 6.5 below; which itself relates to the criteria for designations as drawn from the Department for Digital, Culture, Media and Sport (DDCMS) publication, Principles for Selection of Listed Buildings[47] and the Scheduled Monuments Policy Statements published by the same body[48], which outline the criteria for designating heritage assets, and the HE guidance written to expand upon the guidance by DDCMS.

Table 6.5: Criteria for Establishing Importance of Heritage Assets

Importance	Criteria
Very High	World heritage sites; Other designated or non-designated assets with demonstrable outstanding universal value.
High	Scheduled monuments (actual and potential)[49]; Grade I and II* listed buildings[50]; Grade I and II* registered parks and gardens[51]; Registered battlefields[52]; Outstanding examples of some period, style or type; Non-designated assets considered to meet the criteria for the designation as per the types and grades of designation noted above and/or Non-designated assets considered to be of national importance (as stated in NPS EN-1[53], NPS EN-3[54], NPPF[55] and PPG[56]).
Medium	Grade II listed buildings; Grade II registered parks and gardens; Conservation areas[57]; Major or representative examples of some period, style or type; or Non-designated assets considered to meet the criteria for the designations as set out above and/or Non-designated assets considered to be of regional importance (as stated in NPS EN-1[58], NPS EN-3[59], NPPF[60] and PPG[61])
Low	Locally listed assets; Examples of any period, style or type which contribute to our understanding of the historic environment at the local level; Non-designated heritage assets identified by local historic environment records and/or Non-designated assets considered to

Importance	Criteria
	be of local importance protected by NPS EN-1[62], NPS EN-3[63], NPPF[64] and PPG[65]
Negligible	Relatively numerous types of remains; Findspots or artefacts that have no definite archaeological remains known in their context; Non-designated heritage assets of lesser heritage significance (as stated in NPS EN-1[66], NPS EN-3[67], NPPF[68] and PPG[69])
Unknown	E.g. for geophysical anomalies, cropmarks and other features that have an uncertain provenance (i.e. that may be archaeological). For potential heritage assets within a Site (i.e. where potential assets are anticipated but it is unclear from information available how important those remains would be if encountered)

6.4.10 While determining the relative cultural significance of a heritage asset is essential for establishing its importance, it is widely recognised[70] that the importance of an asset is not the same as its sensitivity to changes to its setting. Thus, in determining effects upon the setting of assets by the Scheme, both importance and sensitivity to changes to setting need to be considered.

6.4.11 The Xi'an Declaration[71] set out the first internationally accepted definition of setting with regard to heritage assets and features, indicating that setting is important where it forms part of or contributes to the significance of a heritage asset. NPS EN-1 notes that *'The setting of a heritage asset is the surroundings in which it is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset and may affect the ability to appreciate that significance or may be neutral'*[72]

6.4.12 The HE guidance on the setting of heritage assets notes that the importance of setting '*lies in what it contributes to the significance of the heritage asset or to the ability to appreciate that significance'*[73].

6.4.13 Setting, therefore, is a key issue in the case of some, but by no means all assets. An asset of very high or high importance does not necessarily have high sensitivity to changes to its setting (e.g. does not necessarily have a high relative sensitivity). An asset's relative sensitivity to alterations to its setting

refers to its capacity to retain its ability to contribute to our understanding and appreciation of the past in the face of changes to its setting. The ability of an asset's setting to contribute to an understanding, appreciation and experience of it and its significance also has a bearing on the sensitivity of that asset to changes to its setting. Assets with high sensitivity may be vulnerable to changes that affect their settings, and even slight changes may reduce their significance or the ability of setting to contribute to the understanding, appreciation, and experience of the asset. Less sensitive assets will be able to accommodate greater changes to their settings without a reduction in their significance and, in spite of such changes, the relationship between the asset and its setting will still be legible. In establishing the relative sensitivity of an asset to changes to its setting, the setting must first be identified. This assessment outlines a range of factors, through qualitative written narrative, which will be considered when establishing the setting of an asset and therefore determining its sensitivity. The factors will be assessed from known records and in the field. In defining these criteria, emphasis has been placed on establishing the current setting of each asset, how this contributes to the significance of the asset and how the Scheme would affect it.

6.4.14 The criteria for establishing an asset's relative sensitivity are outlined in Table 6.6. This table has been developed based on professional judgement and previous experience in assessing setting effects. It has been developed with reference to the policy and guidance noted above including NPS EN-1[74], NPS EN-3[75], NPPF[76], PPG[77], the Xi'an Declaration[78] and HE's guidance on the setting of heritage assets[79].

Table 6.6: Criteria for Establishing Relative Sensitivity of a Heritage Asset to Changes to its Setting

Relative Sensitivity to Changes to Setting	Criteria
Very High	An asset, the setting of which, is critical to an understanding, appreciation and experience of it should be thought of as having Very High Sensitivity to changes to its setting. This is particularly relevant for assets whose settings, or elements thereof, make an essential direct contribution to their cultural significance.

Relative Sensitivity to Changes to Setting	Criteria
High	An asset, the setting of which, makes a major contribution to an understanding, appreciation and experience of it should be thought of as having High Sensitivity to changes to its setting. This is particularly relevant for assets whose settings, or elements thereof, contribute directly to their cultural significance.
Medium	An asset, the setting of which, makes a moderate contribution to an understanding, appreciation and experience of it should be thought of as having Medium Sensitivity to changes to its setting. This could be an asset for which setting makes a contribution to significance but whereby its value is derived mainly from its other characteristics.
Low	An asset, the setting of which, makes some contribution to an understanding, appreciation and experience of it should generally be thought of as having Low Sensitivity to changes to its setting. This may be an asset whose value is predominantly derived from its other characteristics.
Negligible	An asset whose setting makes minimal contribution to an understanding, appreciation and experience of it should generally be thought of as having Negligible Sensitivity to changes to its setting.

Criteria for assessing Magnitude of Impact

6.4.15 Potential impacts, that is the physical change to known heritage assets, and unknown buried archaeological remains, or changes to their settings, in the case of the Scheme largely relate to the possibility of disturbing, removing or destroying in situ remains and artefacts during the construction phase or the placement of new features within their setting during the construction and operational phases.

6.4.16 The magnitude of the impacts upon heritage assets caused by the Scheme is rated using the classifications and criteria outlined in Table 6.7.

Table 6.7: Criteria for Classifying Magnitude of Impact

Magnitude of Impact	Criteria
High	Substantial loss of information content resulting from total or large-scale removal of deposits from an asset; Major alteration of an asset's baseline setting, which materially compromises the ability to understand, appreciate and experience

Magnitude of Impact	Criteria
	the contribution that setting makes to the significance of the asset and erodes the key characteristics of the setting.
Medium	Loss of information content resulting from material alteration of the baseline conditions by removal of part of an asset; Alteration of an asset's baseline setting that effects the ability to understand, appreciate and experience the contribution that setting makes to the significance of the asset to a degree but whereby the cultural significance of the monument in its current setting remains legible.
Low	Detectable impacts leading to minor loss of information content. Alterations to the asset's baseline setting, which do not affect the ability to understand, appreciate or experience the contribution that setting makes to the asset's overall significance. The key characteristics of the setting are not eroded.
Negligible	Loss of a small percentage of the area of an asset's peripheral deposits; A reversible alteration to the fabric of the asset; A marginal alteration to the asset's baseline setting.
None	No impact predicted.

Criteria for assessing Significance of Effect

6.4.17 The predicted level of effect on each heritage asset is then determined by considering the asset's importance or relative sensitivity in conjunction with the predicted magnitude of the impact. The method of deriving the level of effect is provided in Table 6.8.

Table 6.8: Level of Effect based on Inter-Relationship between the Importance and/or Relative Sensitivity of a Heritage Asset and/or its setting and the Magnitude of Impact

Magnitude of Impact	Importance/ Sensitivity				
	Negligible	Low	Medium	High	Very High
High	Minor	Moderate	Moderate	Major	Major
Medium	Negligible/Neutral	Minor	Moderate	Moderate	Major
Low	Negligible/Neutral	Negligible/Neutral	Minor	Minor	Moderate

Negligible	Negligible/Neutral	Negligible/Neutral	Negligible/Neutral	Minor	Minor
The levels of effect recorded in grey highlighted cells are 'significant'					

6.4.18 The level of effect is judged to be the interaction of the asset's importance and / or relative sensitivity (Tables 6.5 and 6.6) and the magnitude of the impact (Table 6.7). In order to provide a level of consistency, the assessment of importance and relative sensitivity, the prediction of magnitude of impact and the assessment of level of effect is guided by pre-defined criteria. However, a qualitative descriptive narrative is also provided for each asset to summarise and explain each of the professional value judgements that have been made in establishing sensitivity and magnitude of impact for each individual asset.

6.4.19 Professional judgement will be used to establish those effects which are deemed to be significant in EIA terms. However, with reference to the Guidelines for Environmental Impact Assessment[80], the level of effect determined from Table 6.8 will help guide the assessor in their judgement. Effects determined to be moderate and greater (bold in Table 6.8), are most likely to be significant in EIA terms, while minor and lesser effects are likely to be considered not significant in EIA terms.

Harm

6.4.20 NPS EN-1[81] and NPS EN-3[82] require an assessment as to the level of harm that may be caused to designated assets as a result of development proposals. Whether that harm is considered to be 'substantial' or 'less than substantial' determines the policy test to be met[83].

6.4.21 The PPG[84] notes that '*substantial'* harm is a *'high test'* and that as such it is unlikely to result in many cases. What matters in establishing whether harm is '*substantial'* or not, relates to whether a change would seriously adversely affect those attributes or elements of a designated asset that contribute to, or give it, its significance.

6.4.22 In terms of effects upon the setting of designated heritage assets, it is considered, with reference to professional judgement, guidance within the Planning Practice Guidance on what constitutes '*substantial'* harm and based on the assessment criteria set out above, that only those effects identified as '*significant'* in this assessment have the potential to cause *'substantial'* harm. Where no significant effect is found, the harm is considered to be *'less than substanti*al', or potentially not harmful at all. This is because, as set out earlier in this methodology, effects only reach the significance threshold if their relative sensitivity to changes in setting is at the higher end of scale, or if the magnitude of change is at the higher end of the scale.

6.4.23 For many designated assets, setting may not contribute to their significance or its contribution to significance may be limited. For these assets, even High magnitude changes to setting are unlikely to have adverse effects on the overall significance of the designated asset. As stated above lower ratings of magnitude of change tend to relate to notable or perceptible changes to setting but where these changes do not necessarily obscure or damage elements of setting or relationships which directly contribute to the significance of assets. As such, effects that are not significant will result in *'less than substantial'* harm or where there are no effects or effects are deemed to be Neutral there will be no harm.

6.4.24 Where significant effects are found, a detailed assessment of the level of harm will be made. Whilst non-significant effects will cause *'less than substantial'* or no harm, the reverse is not always true. That is, the assessment of an effect as being '*significant'* does not necessarily mean that the harm to the asset is '*substantial'*. The assessment of level of harm, where required, will be a qualitative one, and will largely depend upon whether the effects predicted would result in a major impediment to the ability to understand or appreciate the heritage asset in question by reducing or removing its information content and therefore reducing its cultural significance.

Cumulative Effects

6.4.25 The assessment of cumulative effects has been undertaken in a similar manner to that of the potential effects but will take into consideration other developments as set out within **ES Vol 1 Chapter 17 [EN010141/DR/6.1]** and agreed with the local planning authorities, including those which are operational, under construction, consented or proposed. Cumulative effects relating to cultural heritage are for the most part limited to effects upon the settings of heritage assets.

6.4.26 The cumulative assessment will have regard to the guidance on cumulative impacts upon heritage assets as set out in Environmental Impact Assessment Handbook V5[85], and will utilise the criteria for assessing setting effects as set out above. The assessment of cumulative effects will consider whether there would be an increased impact, either additive or synergistic, upon the setting of heritage assets as a result of adding the Scheme to the cumulative development as agreed with consultees. In line with HE setting guidance consideration will be given to whether the additional change, which would result from the Scheme will further harm the significance of the asset[86].

6.5 Assumptions and Limitations

6.5.1 This assessment is based upon data obtained from publicly accessible archives, as described in Section 6.4.2, a walkover survey, an archaeological geophysical survey and trial trench excavations.

6.5.2 Historic Environment Record (HER) Data was originally received from the Bedford Borough and Cambridgeshire HERs in 2022 (to inform initial desk-based research and a Scoping Chapter) and up-to-date HER data was ordered and received in February 2024. Designated asset data was downloaded from HE website in July 2025.

6.5.3 A walkover survey and setting assessment was conducted between the 16th and 26th of July 2022 with fields that now form Sites A, B and C visited along with designated heritage assets and identified non-designated heritage buildings to assess the potential effects of the Scheme on their settings. The strategy for assessing heritage assets on private property involved establishing a viewpoint from the closest public footpath or road. It should be noted that the site walkover and the setting assessment site visits were undertaken in July where many of the fields were still in crop and thus ground visibility and access was in part limited.

6.5.4 Site D was added to the Scheme after the completion of the walkover survey but has been visited as part of the archaeological geophysical survey that was undertaken between November 2022 and October 2023.

6.5.5 There are areas within the Order Limits that have not been accessible for geophysical survey prior to the submission of the DCO. These include one field within Site B (sub-area B29). It is proposed that these areas would be surveyed as part of the *'Site Preparation Works'* described in **ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1]** prior to the construction phase of the Scheme.

6.5.6 Liaison with the CHET and BBHET to establish the scope of any intrusive trial trench evaluation has been undertaken and a Written Scheme of Investigation

(WSI) for evaluation within Sites A, B, C and D has been approved. AOC Archaeology have undertaken trial trench evaluation across the majority of Sites A, B, C and D within the Scheme between June 2024 and September 2025. The technical reports for the completed areas of trial trenching are included as **ES Vol 2 Appendix 6-6 to 6-9 [EN010141/DR/6.2]**. The brief which was jointly issued by CHET and BBHET required two phases of archaeological investigation prior to construction. Therefore, following the granting of the DCO, a second phase of trial trenching will be undertaken where geophysical survey has been carried out and not sampled, or not sampled fully, during the pre-application period. There are areas of the Order Limits that have not been accessible for trial trenching prior to the submission of the DCO. These principally include the cable corridors between East Park Site B to C and East Park Site C to D and the grid connection route as well as two fields within Site B (sub-areas B25 and B29) and one field within Site D (sub-area D02).

6.5.7 It is intended that a WSI for this additional trial trenching will be developed in line with the brief prepared by CHET and BBHET and in line with aims and objective outlined in the **oAMS [EN010141/DR/7.15].**

6.5.8 A robust consideration of the potential effects upon archaeology and cultural heritage receptors is set out herein, based on the work undertaken to date.

6.6 Baseline Conditions

Baseline for Potential Direct Impacts

6.6.1 The heritage baseline conditions identified within the Site and 1 km study area are discussed in detail within a Cultural Heritage and Archaeology 'Desk Based Assessment' (DBA) which is included as **ES Vol 2 Appendix 6-2 [EN010141/DR/6.2]**. The DBA includes a period-by-period review of all the available NHLE and HER data within the 1 km study area and sections outlining relevant previous archaeological investigations as well as cartographic, aerial photography and LiDAR assessments.

6.6.2 AOC Archaeology have undertaken archaeological geophysical survey across the Site in multiple phases between November 2022 and September 2025. The archaeological geophysical survey has been undertaken in accordance with approved WSIs for each survey, and these WSIs have been appended to the geophysical survey reports which form **ES Vol 2 Appendix 6-5 [EN010141/DR/6.2]**.

6.6.3 AOC Archaeology have also undertaken trial trench evaluation across Sites A, B, C and D within the Site between June 2024 and September 2025. The technical reports for the completed areas of trial trenching are included as **ES Vol 2 Appendices 6-6 to 6-9 [EN010141/DR/6.2]**,

6.6.4 The following sections include a summary of the identified heritage assets and geophysical survey anomalies within the Order Limits along with an assessment of the potential for further as yet unidentified remains that will be used to form the baseline for the assessment of direct impacts during the construction phase of the Scheme.

Site A

6.6.5 The identified heritage assets within Site A include cropmarks of prehistoric hut circles (Asset 210); the extent of a medieval deer park (centred Asset 515 and also recorded by the HER as Asset 514); and post-medieval remains

typical of a rural, agrarian landscape including historically recorded buildings (Assets 178, 188, 321, 736 and 737), a fishpond (Asset 438), rabbit warren (Asset 335), extraction pits (Asset 173) and a field name 'Brick Pastures' thought to be associated with a former brick works (centred Asset 333).

6.6.6 National Mapping Project data provided by the Bedford Borough HER also records areas of levelled medieval ridge and furrow (centred Assets 814 and 816) and post-medieval steam ploughed cultivation remains within Site A (centred Assets 815) which are thought to be remnants of the former land enclosure within the parishes of Keysoe (Asset 862) and Pertenhall (Asset 864), as depicted on late 18th century enclosure maps.

6.6.7 The Bedford Borough HER also records one of the historic routes (as recorded on post-medieval mapping) within the parish of Pertenhall running in to the north-eastern most field of Site A (Asset 860), as a no longer extant continuation of Green End, Pertenhall.

6.6.8 The only previous archaeological investigation recorded near to Site A was a large trial trench evaluation in 2013 (centred Events 527 and 555) that is located within a field that is surrounded by, but not included within, the extent of Site A. This evaluation identified areas of Iron Age, early Roman, medieval, and post-medieval activity[87].

6.6.9 The geophysical survey undertaken by AOC identified numerous anomalies (Anomalies 34a, 36a, 38a, 39a, 41a) within Site A which appear to form six main foci of archaeological activity. These include anomalies thought to be related to the HER documented prehistoric hut circles (Anomaly 41a; Asset 210) as well as further linear enclosure features (Anomalies 34a and 38a) and further likely settlement enclosures including ring ditches (Anomalies 36a, 39a and 41a). The survey also identified a positive anomaly (Anomaly 37a) that could relate to spread out material from a former building (Asset 176), linear positive anomalies that correlate to field boundaries on historic mapping (**ES Vol 3 Figure 6-20 [EN010141/DR/6.3]**) and two areas of highly magnetic dipolar anomalies (Anomalies 41b and 41c) that appear to relate to the

location of a former gravel pit (Asset 173) and the former site of Beavers Park Farm (Assets 178 and 321). Modern and historic agricultural practices have also been recorded in the form of historic ridge and furrows regimes, modern ploughing, and drains. Further possible archaeological anomalies (Anomalies 34b, 34c, 34d, 35a; 36b, 38b and 39b) are recorded within Site A in forms that could not be more confidently interpreted due to being inconsistent or slightly ephemeral. These anomalies are fully described (**ES Vol 2 Appendix 6-5**, **[EN010141/DR/6.2]** Pages 9 to 10) and illustrated (**ES Vol 2 Appendix 6-5**, **[EN010141/DR/6.2],** Figures 6.1 to 6.15) within the geophysical survey report.

6.6.10 The trial trench evaluation of East Park Site A was carried between July and August 2025. For the purposes of the evaluation Site A was divided into nine sub-areas (sub-areas A01-A09). A total of 185 trenches were opened and of these, 56 contained archaeological features.

6.6.11 Overall, the evidence retrieved from the trenching suggests a landscape utilised for farming within the late prehistoric and early Roman periods, in the form of enclosures, and beyond into the post-medieval with agricultural use of the land. There has also been evidence of settlement recorded in the form of potential hut circles and settlement enclosures, with the main concentration being present in sub-area A08, but with similar archaeology visible in sub-area A02 and sub-area A07. Further post-excavation processing will need to be undertaken to revise the interpretation of this activity and its dates. The report for the archaeological trial trenching within Site A forms **ES Vol 2 Appendix 6-6: Site A Trial Trench Evaluation Interim Report [EN010141/DR/6.2]** and a more detailed summary of the trenching results is included within **ES Vol 2 Appendix 6-2 [EN010141/DR/6.2]** and the **oAMS [EN010141/DR/7.15].**

6.6.12 The results of the geophysical survey and trial trenching undertaken to date (September 2025) within Site A have been used to identify 10 Areas of Archaeological Constraint (AACs) where there is considered to be a high potential for further remains of at least regional (Medium) importance. These remains would most likely date from the Iron Age to Roman periods

(concentrated in the areas of probable settlement cropmarks and geophysical anomalies) and from the medieval and post-medieval periods (most likely relating to agricultural activities).

6.6.13 Outside these AACs there is considered to be a Low potential for archaeological remains of at least regional (Medium) importance (of any date), with the identified isolated features (outside the AACs) generally corresponding to areas of ridge and furrow and former field boundaries of post-medieval date.

6.6.14 It is, therefore, considered that there is a Low potential for archaeological remains of any date in the areas without recorded anomalies or archaeological features within Site A, though the potential for remains cannot be entirely discounted.

Site B

6.6.15 The heritage assets identified within Site B include cropmarks interpreted as the remains of a Bronze Age and/or Iron Age ring ditch (Asset 279); as well as undated and Iron Age and/or Romano-British enclosures and settlements (Assets 218, 219, 237, 273, 274 & 275).

6.6.16 Three buildings, all of which likely date from at least the post-medieval period (Assets 186, 322 & 738) and several extraction pits (centred Assets 338 and 346) have also been recorded within Site B.

6.6.17 A number of findspots (Assets 740-749) including an Anglo-Saxon coin, as well as medieval and post-medieval metal items (largely coins) have been reportedly recovered during metal detecting activities within Site B.

6.6.18 The Bedford Borough HER also records one of the historic routes within the parish of Keysoe (Asset 858) running on the alignment of the B660 in the western part of Site B along with the recorded location of a former milestone (Asset 455). It also records a no longer extant route that ran through the parish of Little Staughton (Asset 861), running on a curving west to east alignment between Keysoe and Green End, which appears to survive as the line of some

of the field boundaries in the southern part of Site B. These recorded post-medieval routes in the parish of Little Staughton that run through Site B also include the extant routes of Little Staughton Road and Staughton Road.

6.6.19 National Mapping Project data also records areas of ridge and furrow (Assets 817, 818, 826 and 829) and former boundary banks (centred Assets 819, 821 to 825 and 827 to 828). The site visit confirmed that most of these features appear to have been levelled with the exception of a low rise identified along a field boundary within the centre northern area of Site B which may correlate to Asset 822 and extant earthwork remains of an area of ridge and furrow in the south-eastern corner of Site B (centred Asset 829).

6.6.20 The geophysical survey undertaken by AOC identified numerous archaeological anomalies within Site B (Anomalies) which appear to form eight focussed areas of activity which most likely represent well-structured settlement systems with double ditch trackways (Anomalies 18a and 27a), enclosure systems (Anomalies 7a; 10a; 11a; 11b; 12a; 20a; 21a; 21c; 26a; 28b and 31a) and possible funerary activity in the form of barrows (Anomaly 28a). Some of the anomalies thought to be indicative of prehistoric settlement (Anomalies 18a and 20a) correlate with HER recorded cropmarks (Assets 219 and 275) in the southern part of Site B. The survey also identified a circular area of relatively magnetically quiet response (Anomaly 30a) which could be natural or could relate to the location of a former gravel pit (Asset 340); along with a spread of dipolar anomalies that are considered likely to relate to extraction activities in the northern part of Site B. Linear positive anomalies that correlate to field boundaries on historic mapping (**ES Vol 3 Figure 6-21 [EN010141/DR/6.3]**) were identified across Site B and modern and historic agricultural practices have also been recorded in form of historic ridge and furrows regimes, modern ploughing, and drains. Further possible archaeological anomalies (Anomalies 8a; 8c; 11c; 18c; 18d; 20c; 21b; 21d; 26b and 33a) are recorded within Site B in forms that could not be more confidently interpreted due to being inconsistent or slightly ephemeral. The anomaly recorded as 21b appears to be in the vicinity of D-shaped enclosure

cropmarks recorded in the HER (centred Asset 217). These anomalies are fully described (**ES Vol 2 Appendix 6-5**, **[EN010141/DR/6.2]** Pages 10 to 13) and illustrated (**ES Vol 2 Appendix 6-5**, **[EN010141/DR/6.2]** Figures 6.16 to 6.47) within the geophysical survey report.

6.6.21 The trial trench evaluation of East Park Site B was carried between July and August 2025. Area B is divided into 31 sub-areas (sub-areas B01 to B31). A total of 460 trenches were opened across 29 of the sub-areas (an additional 32 trenches have been excavated in sub-area B28, but their results are yet to be processed, and trenching has yet to be undertaken within sub-areas B25 and B29). Of the 460 trenches opened, 112 contained archaeological features.

6.6.22 Overall, the evidence retrieved from the trenching suggests a landscape utilised within the late prehistoric, early Roman period, and beyond into the post-medieval with agricultural use of the land. Assessment of dating material in due course should aid in defining this activity. The report for the archaeological trial trenching within Site B forms **ES Vol 2 Appendix 6-7: Site B Trial Trench Evaluation Interim Report [EN010141/DR/6.2]** and a more detailed summary of the trenching results is included within **ES Vol 2 Appendix 6-2 [EN010141/DR/6.2]** and the **oAMS [EN010141/DR/7.15]**.

6.6.23 The results of the geophysical survey and trial trenching undertaken to date (September 2025, results from sub-area B28 are yet to be processed, geophysical survey yet to be undertaken within sub-area B29, and trenching has yet to be undertaken within sub-areas B25 and B29) within Site B have been used to identify 19 AACs where there is considered to be a high potential for further remains of at least regional (Medium) importance. These remains most likely date from the Iron Age to Roman periods (associated with excavated features identified in the areas of probable settlement cropmarks and geophysical anomalies) and from the medieval and post-medieval periods (most likely relating to agricultural activities).

6.6.24 Outside these AACs there is considered to be a Low potential for archaeological remains of at least regional (Medium) importance (of any date), with the identified isolated features (outside the AACs) generally corresponding to areas of ridge and furrow and former field boundaries of post-medieval date.

6.6.25 It is, therefore, considered that there is a Low potential for archaeological remains of any date in the areas without recorded anomalies or archaeological features within Site B, though the potential for remains cannot be entirely discounted.

Cable Corridor - Site B to Site C

6.6.26 Between Sites B and C, levelled ridge and furrow cultivation has been recorded from historic aerial photography (centred Asset 678). These remains as well as other parcels of reported ridge and furrow are thought to be associated with the historic and deserted settlement known as Garden Farm (centred Asset 593, within the westernmost part of Site C). LiDAR data (**ES Vol 3 Figure 6-33 [EN010141/DR/6.3]**) appears to indicate an area of earthwork remains to the south-east of the Site B to Site C Cable Corridor, but these appear to be an extant modern pond and woodland rather than features of heritage significance. An Iron Age ditch was recorded (Asset 652) during an evaluation at the Orchard, Garden Farm in 2018 (Event 735) in an area just to the north of the Site B to Site C Cable Corridor.

6.6.27 The results of the geophysical survey within the Site B to Site C Cable Corridor have revealed anomalies that appear to correlate with the areas of ridge and furrow ploughing (Asset 678) as well as historic field boundaries visible on OS mapping.

6.6.28 It is intended that a WSI for trial trenching within the cable corridor, if required, will be developed in line with the brief prepared by CHET and BBHET and in line with aims and objective outlined in the **oAMS [EN010141/DR/7.15].**

6.6.29 Along the Site B to Site C Cable Corridor it is assessed that there is a High potential for remains dating from the medieval and post-medieval periods (most likely relating to agricultural activities in the form of recorded areas of ridge and furrow and former field boundaries), a Medium potential for remains of Iron Age to Roman date (due to nearby recorded features) and a Low potential for remains of any other date. Further investigation, in the form of trial trenching, may further revise this assessment of potential.

Site C

6.6.30 There is a scheduled monument located adjacent to the southern boundary of Site C; Two bowl barrows 900 m and 1 km east of Old Manor Farm (centred Asset 13) which are considered likely to be Late Neolithic to Bronze Age in date.

6.6.31 The only broadly contemporary activity identified takes the form of a findspot of a polished stone axe (Asset 676) which is also documented within Site C.

6.6.32 The non-designated heritage assets identified within Site C are largely grouped in its northern half, which occupies relatively flat ground to the south of the River Kym. Remains in this area have been reported to include undated mounds associated with flints (Asset 584); square and rectilinear enclosures (Assets 629, 690, 707 & 710), which were considered likely to be indicative of Roman settlement by the Cambridgeshire HER; a possible Roman Road aligned roughly north-east, south-west (centred Asset 691); an area of quarrying and possible structure (Asset 592), which may also be Roman in date and four findspots (Assets 585, 589, & 591 and 839) which are Roman in date. These non-designated heritage assets are located within the extent of the newly Scheduled Roman small town south of Great Staughton (Asset 991, Scheduled in September 2024), whose extent was identified via geophysical survey (see section 6.6.25) and limited trial trenching (see section 6.6.9).

6.6.33 The Cambridgeshire Historic Environment Record (‘CHER’) also records the centre point for a former settlement, Garden Farm, Great Staughton (Asset

593) within the westernmost fields of Site C. This heritage asset marks the centre of a linear arrangement of enclosures, formerly visible as cropmarks, that are thought to be associated with the adjacent areas of ridge and furrow earthworks and banks to the west (Asset 678) and east (Assets 987 to 990) that were recorded in the National Mapping Project data and appear to be visible in the processed LiDAR data produced for this assessment (**ES Vol 3 Figure 6-33 [EN010141/DR/6.3]**).

6.6.34 Further activity is also identified within Site C in the form of the extent of a medieval deer park (Asset 668) and areas of medieval ridge and furrow cultivation (Assets 678, 680, 690, 830, 937, 943 and 944).

6.6.35 Three post-medieval buildings including two possible farms or ancillary agricultural structures (Assets 184 & 185) and one mill (Asset 190), have also been recorded from historic mapping within Site C.

6.6.36 The geophysical survey undertaken by AOC identified an extensive area of archaeological activity within the northern part of Site C spreading across approximately 31ha which appears to reflect a well organised and advanced settlement (relating to the recorded cropmark Assets 629, 690, 707 & 710) of probable Romano-British date with a network of roads (including Asset 691), internal divisions, and possible central main square. It is also considered likely that the area was used for production activity. The recorded anomalies within this 31ha settlement include, but are not limited to, a central empty and magnetically quiet rectilinear area, possibly a main square, (Anomaly 44c) from which at least three sets of linear anomalies, likely roads, converge (Anomalies 46a; 42b; 47a). The density of anomalies in the geophysical survey is considered likely to be representative of multiple phases of occupation in what is being interpreted as a small Roman town with evidence for possible production activities, such as pottery or metal working along its margins (**ES Vol 2 Appendix 6-5**, **[EN010141/DR/6.2]** Pages 12 to 13 and Figures 4.9, 4.10, 6.48, 6.49, 6.50, 6.51, 6.52 and 6.53).

6.6.37 Additionally, the geophysical survey also identified a separate focus of archaeological activity in the southern part of Site C in the form of semi-rectilinear and rectilinear shapes (Anomaly 43a) that do not appear to be as dense as the settlement to the north but could still prove to be contemporary (**ES Vol 2 Appendix 6-5**, **[EN010141/DR/6.2]** Page 13 and Figure 6.55).

6.6.38 Linear positive anomalies that correlate to field boundaries on historic mapping (**ES Vol 3 Figure 6-22 [EN010141/DR/6.3]**) were also identified across Site C and modern and historic agricultural practices have also been recorded in the form of historic ridge and furrow regimes, modern ploughing, and drains. Further possible archaeological anomalies (Anomalies 43b; 43c; 46b; 47c; and 47d) are recorded within Site C in forms that could not be more confidently interpreted due to being inconsistent or slightly ephemeral. Anomalies of unclear origin (Anomalies 42c; 44b and 43d), which do not exhibit any characteristic shapes or signals, were also identified within Site C which may be of natural or modern origin but could also prove to be archaeological in nature. These anomalies are fully described (**ES Vol 2 Appendix 6-5**, **[EN010141/DR/6.2]**, Pages 13 to 16) and illustrated (**ES Vol 2 Appendix 6-5**, **[EN010141/DR/6.2]**, Figures 6.47 to 6.58) within the geophysical survey report.

6.6.39 Preliminary analysis of the geophysical survey within Fields 65 and 66 (the westernmost of the fields within Site C) has identified a concentred cluster of positive linear, curvilinear and circular anomalies within the centre of Field 66 which are suggestive of possible prehistoric settlement structures or an enclosure system. Anomalies of similar morphology extend further south, close to the border with Area 66 and possibly beyond; however, a mapped historic field boundary is overlapping with the cluster of probable archaeology and continues further south crossing via entire Area 65; therefore, some of those anomalies are connected to the field boundary itself. Possible archaeological anomalies have also been recorded within the southern part of Area 66, in the form of discrete linear, curvilinear and circular anomalies (Anomaly 66b) and in the eastern part of Area 65 (Anomaly 65a), both of

which may be archaeological in nature but are too ephemeral or obscured by evidence for post-medieval and modern agricultural activities. Anomalies of unclear origin (Anomaly 65b) and linear anomalies that appear to be representative of historic field boundaries were also identified within Fields 65 and 66. These anomalies are fully described (**ES Vol 2 Appendix 6-5**, **[EN010141/DR/6.2],** Pages 13 to 16) and illustrated (**ES Vol 2 Appendix 6-5**, **[EN010141/DR/6.2],** Figures 6.67 to 6.69) within the geophysical survey report.

6.6.40 An application to schedule the possible Roman settlement (centred on Asset 991) within the northern part of Site C was submitted to HE in May 2024 and in support of this a limited trial trench evaluation was undertaken in May 2024. This evaluation was comprised of four trenches, each measuring 20m x 3.6m. These trenches were designed to target different geophysical anomalies and characterise the archaeological remains. Archaeological remains were present in all four trenches. These features included two pits and four ditches within trench 1; two roads or yard surfaces, two ditches, two pits and one posthole within trench 2; a robbed out wall, three ditches, two pits and one posthole within trench 3; and six ditches and two postholes within trench 4. The provisional results indicate that the majority of the features recorded date to the Roman period and most of the remains were noted to be fairly well preserved with the upper levels of Roman occupation lying directly beneath the modern ploughsoil which was up to 0.3m deep. There was also some limited evidence for earlier activity within trench 4 but this could not be confirmed within the confines of the investigation. It was also noted that the archaeological features recorded were largely in keeping with the anomalies recorded through geophysical survey, indicating a high confidence rating in the geophysical survey results (see **ES Vol 2 Appendix 6-6 [EN010141/DR/6.2]**). The Roman Settlement (centred on Asset 991) was Scheduled in September 2024.

6.6.41 The trial trench evaluation of East Park Site C was carried out in three phases between May 2024 and April 2025. For the purposes of the evaluation Site C

was divided into four sub-areas: C01, C02, C03 and C04. A total of 175 trenches (measuring 50m x 1.80m) were opened and of these, 57 contained archaeological features.

6.6.42 The recorded features within the trenches listed above included ditches gullies and pits, many of which produced finds material with most of the ceramics identified dated to the Roman period (mostly to the mid/late 1st century AD, with some indication of limited continuity into the early/mid-2nd century AD). Two of the features recorded in one of the trenches (trench 803) contained evidence for cremated remains, providing evidence for burial practices likely associated with the Roman Town. As well as these earlier features some trenches also recorded the presence of furrows that are likely medieval or post-medieval in date and some of the excavated ditches appear to align with field boundaries recorded on late 19th century historic mapping. The report for the archaeological trial trenching within Site C forms **ES Vol 2 Appendix 6-8: Site C Trial Trench Evaluation Final Report [EN010141/DR/6.2]** and a more detailed summary of the trenching results is included within **ES Vol 2 Appendix 6-2 [EN010141/DR/6.2]** and the **oAMS [EN010141/DR/7.15**.

6.6.43 The results of the geophysical survey and trial trenching undertaken to date (September 2025) within Site C have been used to identify five AACs where there is considered to be a high potential for further remains of at least regional (Medium) importance. These remains would most likely date from the Iron Age to Roman periods (including remains that are likely cotemporary to the Roman small town to the south of Great Staughton Scheduled Monument – Asset 991) and from the medieval and post-medieval periods (most likely relating to agricultural activities).

6.6.44 Outside these AACs there is considered to be a Low potential for archaeological remains of at least regional (Medium) importance (of any date), with the identified isolated features (outside the AACs) generally corresponding to areas of ridge and furrow and former field boundaries of post-medieval date.

6.6.45 It is, therefore, considered that there is a Low potential for archaeological remains of any date in the areas without recorded anomalies or archaeological features within Site C, though the potential for remains cannot be entirely discounted.

Cable Corridor - Site C to Site D

6.6.46 An area of mapped ridge and furrow (Asset 679) is recorded as extending into the Site C to Site D Cable Corridor.

6.6.47 The results of the geophysical survey within the Site C to Site D Cable Corridor have revealed a possible archaeological feature in the form of two parallel trends (geophysical Anomaly 105a) at the eastern end of the cable corridor which may be indicative of a trackway associated with the moated site (Asset 407) or enclosures detected to the northwestern part of Site D. An unclear anomaly (which may be archaeological) has been recorded within the western part of the cable corridor in the form of a linear trend (Anomaly 105b), which does not appear to extend in to Site C to the west and may have an archaeological origin. A feature correlating with a historic field boundary visible on OS mapping has also been recorded within the western half of the cable corridor along with hints of ridge and furrow cultivation (possibly correlating to Asset 679).

6.6.48 It is intended that a WSI for trial trenching within the cable corridor, if required, will be developed in line with the brief prepared by CHET and BBHET and in line with aims and objective outlined in the **oAMS [EN010141/DR/7.15]**.

6.6.49 Along the Site C to Site D Cable Corridor it is assessed that there is a High potential for remains dating from the medieval and post-medieval periods (most likely relating to agricultural activities in the form of areas of ridge and furrow and former field boundaries), a Medium potential for remains of Iron Age to Roman date (due to nearby recorded features) and a Low potential for remains of any other date. Further investigation, in the form of trial trenching, may further revise this assessment of potential.

Site D

6.6.50 The heritage assets identified within Site D include cropmarks of ditches thought likely to form an enclosure of Iron Age to Roman date (Asset 644); a possible medieval moated site (Asset 407); and the eastern extent of a post-medieval quarry (centred Asset 674).

6.6.51 An aerial investigation and mapping project recorded an undated bank, wall or path (Asset 938) in the north-western part of Site D and a medieval boundary bank and earthwork remains of medieval ridge and furrow (centred Asset 773) as extending into the eastern area of Site D.

6.6.52 The geophysical survey undertaken by AOC identified scattered archaeological anomalies within Site D in the form of settlement/ enclosure systems and possible trackways (Anomalies 48a; 49a; and 49b) which could relate to the area of ditched enclosure cropmarks noted in the HER data (Asset 644). Linear positive anomalies that correlate to field boundaries on historic mapping (**ES Vol 3 Figure 6-23 [EN010141/DR/6.3]**) were identified across Site D and modern and historic agricultural practices have also been recorded in form of historic ridge and furrows regimes, modern ploughing, and drains. Further possible archaeological anomalies are recorded within Site D in forms that could not be more confidently interpreted due to being inconsistent or slightly ephemeral and an anomaly of unclear origin (Anomaly 48d) was also identified which may be related to the post-medieval quarry (centred Asset 674) but could also be natural in origin. These anomalies are fully described (**ES Vol 2 Appendix 6-5, [EN010141/DR/6.2]**, Pages 16 to 17) and illustrated (**ES Vol 2 Appendix 6-5, [EN010141/DR/6.2]**, Figures 6.59 to 6.66) within the geophysical survey report.

6.6.53 The trial trench evaluation of East Park Site D was carried out in one phase in August and September 2025. For the purposes of the evaluation Site D was divided into five sub-areas: D01, D02, D03, D04 and D05. A total of 117 trenches were opened across D01 and D03 to D05 (measuring 50m x 1.80m)

and of these, 47 contained archaeological features. The trial trenching of sub-area D02 is yet to be undertaken.

6.6.54 The archaeological remains found during the trial trenching evaluation show evidence of past activity of later prehistoric to modern date, with a focus on the later prehistoric and Roman periods. It is possible that the trial trenching uncovered remains pre-dating the Iron Age as a small assemblage of worked flint was recovered. Further post-excavation processing will need to be undertaken to revise the interpretation of this activity and its dates.

6.6.55 The results of the geophysical survey and trial trenching within Site D (with trenching of sub-area D02 to be completed) have been used to identify seven AACs where there is considered to be a high potential for further remains of at least regional (Medium) importance. These remains would most likely date from the Iron Age to Roman periods (with excavated features largely concentrated on the areas of probable settlement cropmarks and geophysical anomalies) and from the medieval and post-medieval periods (most likely relating to agricultural activities and quarrying). The report for the archaeological trial trenching within Site C forms **ES Vol 2 Appendix 6-9: Site D Trial Trench Evaluation Interim Report [EN010141/DR/6.2]** and a more detailed summary of the trenching results is included within **ES Vol 2 Appendix 6-2 [EN010141/DR/6.2]** and the **oAMS [EN010141/DR/7.15**.

6.6.56 Outside these AACs there is considered to be a Low potential for archaeological remains of at least regional (Medium) importance (of any date), with the identified isolated features (outside the AACs) generally corresponding to areas of ridge and furrow and former field boundaries of post-medieval date.

6.6.57 It is, therefore, considered that there is a Low potential for archaeological remains of any date in the areas without recorded anomalies or archaeological features within Site D, though the potential for remains cannot be entirely discounted.

Grid Connection

6.6.58 The heritage assets recorded along the route of the grid connection include the presumed route of a Roman road between Cambridge and Bolnhurst (centred Asset 408/706). This road is thought to have been used in later periods and was known as Green Lane (Asset 418). A review of aerial photography also identified a subcircular enclosure of possible later prehistoric date and a circular ditched enclosure of Iron Age or Roman date (Assets 244 to 247) within the southernmost extent of the grid connection as well as further cropmarks interpreted as Iron Age settlement remains (Asset 835) within the southern half of the grid connection.

6.6.59 Three areas of ridge and furrow cultivation (centred Assets 777, 778 & 785) are recorded at the northern end of the grid connection. Further areas of levelled ridge and furrow, with associated banks and ditches, have been identified by aerial photographic and LiDAR analysis (Assets 832 to 834 and 836 to 841) in the central and southern portions of the grid connection, some of which are considered likely to be related to areas of enclosure (centred on Asset 865) depicted on a late 18th century map of Eaton Socon Parish[88]. A further area of ridge and furrow (Asset 842) is recorded as extending to the edge of the proposed access route from the B645 to the grid connection.

6.6.60 The results of the geophysical survey within the grid connection route have revealed archaeological remains in the form of fragmentary linear trends (geophysical anomaly 113a) which suggest possible enclosures and a potential trackway that coincides with a known later prehistoric/Romano British settlement cropmark (Asset 835). Further archaeology in the form of a weak, but well-defined, circular anomaly (geophysical anomaly 115a) which coincides with a recorded subcircular enclosure cropmark (Asset 247) has been recorded towards the southern end of the grid connection route. Further possible archaeology anomalies have been identified within the survey data. These include several linear anomalies (geophysical anomaly 114a) which appear to form a series of enclosures that may be associated with a recorded later prehistoric/Romano British cropmark (Asset 241) and a partial curving

feature (geophysical anomaly 115b) which may correlate to another sub-circular cropmark (Asset 245). Parallel curving trends (geophysical anomaly 109a) have also been categorised as having a possible archaeological origin as they coincide with the location of recorded square and circular enclosures (Asset 787), although agricultural origins are possible. Further anomalies correlating to historic field boundaries and hinting at remnants of ridge and furrow cultivation were found along the entire length of the grid connection.

6.6.61 It is intended that a WSI for any required additional trial trenching along the grid connection will be developed in line with the brief prepared by CHET and BBHET and in line with aims and objective outlined in the **oAMS [EN010141/DR/7.15]**.

6.6.62 Along the grid connection it is assessed that there is a High potential for remains dating from the Iron Age to Roman period (possible settlement remains – Assets 244 to 247 and 835 as well as a documented Roman Road – Asset 408 / 706); a High potential for remains dating from the medieval and post-medieval periods (most likely relating to agricultural activities in the form areas of ridge and furrow and former field boundaries); and a Low potential for remains of any other date. Further investigation, in the form of trial trenching, may further revise this assessment of potential.

Baseline for Potential Setting Impacts

6.6.63 A 3 km study area has been utilised for the assessment of potential impacts on the setting of designated heritage assets including world heritage sites, scheduled monuments, listed buildings, registered parks and gardens, registered battlefields, and conservation areas. The ZTVs produced for the Scheme (**ES Vol 3 Figures 5-3a, 5-3b, 5-3c** and **5-3d [EN010141/DR/6.3]**) indicate that there is very low potential for any visibility beyond 3 km. Consultation with Historic England, BBHET and CHET agreed the scoping in of three designated heritage assets (the grade I listed Church of St Leonard - Asset 985; the grade II* listed Warren House - Asset 984; and the grade II listed Priory Cottage - Asset 983) that are located beyond the 3 km study area.

All of the heritage assets considered for the potential setting impacts are outlined in **ES Vol 2 Appendix 6-4 [EN010141/DR/6.2]** and detailed within **ES Vol 2 Appendix 6-1 [EN010141/DR/6.2]**.

6.6.64 The NHLE records one scheduled monument located just to the south of the southern boundary of Site C; Two bowl barrows 900 m and 1 km east of Old Manor Farm (centred Asset 13). The newly Scheduled Roman town (Asset 991), as identified by the geophysical survey, is located within the northern part of Site C.

6.6.65 There are an additional 17 scheduled monuments recorded within 3 km of the Order Limits. These include a prehistoric defensive and domestic monument (Asset 5); a Roman settlement (Asset 2); an early historic or Saxon settlement and defensive site (Asset 90); medieval moated sites (Assets 3, 4, 6, 7, 8, 9, 10, 91 and 95); medieval defensive and ecclesiastical monuments (Assets 1, 11, 12, & 89) and a post-medieval maltings (Asset 16).

6.6.66 The following conservation areas have been identified within the 3km study area:

- Swineshead (centred Asset 169) c. 820 m west of Site A. There is one grade I listed building, the Church of St Nicholas (Asset 755) and 16 grade II listed buildings within the conservation area.
- Upper Dean (centred Asset 170) c. 2.7 km north-west of Site A. There is one grade I listed building, Church of All Saints (Asset 804) and eleven grade II listed buildings within the conservation area.
- Riseley (centred Asset 171) c. 1.17 km south-west of Site A. Riseley Conservation Area is composed of three separate areas within the modern extent of the village. There is one grade I listed building, Church of All Saints (Asset 332); and 52 grade II listed buildings within the conservation area.
- Stonely (centred Asset 166) c. 2.36 km north of Site B. There are 18 grade II listed buildings within the conservation area.

- Kimbolton (centred Asset 168) c. 2.76 km north of Site B. There are three grade I listed Buildings; Church of St Andrew (Asset 799); Gatehouse to Kimbolton School (Asset 796); and Kimbolton School/ Kimbolton castle (Asset 795) as well as six grade II* listed buildings (Assets 797, 798 and 800 to 803) and 75 grade II listed buildings within the conservation area.
- Great Staughton (centred Asset 164) c. 200m north of Site C. There is one grade I listed building; the Church of St Andrew (Asset 534); one grade II* listed building (Asset 805); and 16 grade II listed buildings within the conservation area.
- Staughton Highway (centred Asset 165) c. 270 m north of Site C. There are 12 grade II listed buildings within the conservation area.
- St Neots (centred Asset 167) c. 400 m east of the grid connection. This conservation area encompasses 150 listed buildings largely grouped in the western and centre eastern area of the conservation area which include the grade I listed Church of St Mary (Asset 807) and six grade II* listed buildings (Assets 808 to 813).

6.6.67 Within the 3 km study area, not within conservation areas, there are an additional four grade I listed buildings:

- Church of St Mary the Virgin (Asset 19) c. 660 m south-west of Site B at Keysoe;
- Church of All Saints (Asset 38), c. 510 m south-east of Site B at Little Staughton;
- Church of St Peter (Asset 48), c. 355 m north-east of Site A at Pertenhall; and
- Bushmead Priory (Asset 80), c. 2.55 km south of Site C, located within the Scheduled extent of Bushmead Priory (centred Asset 11).

6.6.68 Within the 3 km study area, not within conservation areas, there are an additional seven grade II* listed buildings:

- The Old Rectory (Asset 49), c. 200 m north of Site A;

- The Parish Church of St Denys (Asset 99), c. 2 km south-east of the Grid Connection;
- Gaynes Halls (Asset 117), c. 2.53 km north of Site D;
- Bassmead Manor Farmhouse (Asset 159), c.1.37 km south of Site D;
- The Parish Church of St James (Asset 205), c. 3km north-east of the Grid Connection;
- Litte Paxton Hall (Asset 256), c. 3km north-east of the Grid Connection; and
- The Parish Church of St Nicholas (Asset 806), c. 750m north-east of the Grid Connection.

6.6.69 This assessment has also identified 168 grade II listed buildings (Assets 14, 15, 17, 18, 20, 21 to 37, 39 to 47, 50 to 79, 81 to 88, 92 to 94, 96 to 98, 100 to 116, 118 to 163, 199 to 202, 204, 206, 207, 224, 238, 248, 255, 258 to 260, 263, 265, 266, 277, 278, 283 to 285, 293, 296, 306 to 308, 313, 317 and 526) within 3 km of the Order Limits which are located outside the conservation areas discussed above (see **ES Vol 2 Appendix 6-1 [EN010141/DR/6.2]**). These listed buildings can largely be characterised as late medieval and post-medieval and comprise rural farmhouses, cottages, and village residential dwellings typical of a dispersed post-medieval agricultural landscape.

6.6.70 The grade II listed buildings that are located within conservation areas have not been assigned unique Asset Numbers as the potential impacts upon their settings will be considered as part of the assessment of the conservation areas. All of the designated heritage assets identified within 3 km of the Site (with the exception of grade II listed buildings within conservation areas) are depicted on **ES Vol 3 Figures 6-7 to 6-13 [EN010141/DR/6.3]**.

6.6.71 A review of designated heritage assets within the 3 km study area (**ES Vol 3 Figures 6-7 to 6-13 [EN010141/DR/6.3]**) located beyond the ZTVs was undertaken to identify any assets which may be seen backdropped by the Scheme in key views toward them that could impact upon their settings. These assets include those considered to have a High relative sensitivity to changes in their landscape setting and, as such, have been scoped in to the

assessment (all other assets outside the ZTVs have been scoped out but are still shown on **ES Vol 3 Figures 6-7 to 6-13 [EN010141/DR/6.3]** for completeness). These assets outside the ZTV but scoped in include the:

- Kimbolton Conservation Area (Asset 168) including the grade I and grade II* listed elements of Kimbolton School (Assets 795 to 798) and the grade I listed Church of St Nicholas (Asset 799);
- Riseley Conservation Area (Asset 171) including the grade I listed Church of All Saints (Asset 332);
- Upper Dean Conservation Area (Asset 170) including the grade I listed Church of All Saints (Asset 804);
- Grade II* listed Church of St Nicholas in Hail Weston (Asset 806);
- Grade I listed Church of St Leonard in Southoe (Asset 985);
- Grade II* listed Bassmead Manor Farmhouse (Asset 159); and
- Scheduled monuments including motte castles (Asset 12), a village cross (Asset 1), moated sites (Assets 3, 7, 8 and 10), priory's (Assets 11 and 80) and a univallate hillfort and moated site (Asset 5).

6.6.72 This assessment has also scoped in three grade II listed buildings within Duloe (Assets 14, 15 and 157), which are outside the ZTVs and therefore not considered to have any operational phase effects but are located within 500m of the proposed grid connection route so have been included for consideration of construction phase effects. No world Heritage sites, registered parks and gardens or registered battlefields have been identified within the 3 km study area.

6.6.73 The non-designated heritage assets that have also been included within the assessment of potential impact upon setting include assets of potentially national importance and assets agreed by consultation with the BBHET and CHET (as noted in Section 6.3). These are comprised of:

- extant earthwork mounds (Assets 328, 553, and 572);
- suspected deserted medieval village earthworks (Assets 315, 355, 417 and 756);

- potential remnants of moated sites (Assets 311, 378, 407, 610, 633, 640 and 643);
- the earthwork remnants of former designed landscapes/gardens (Assets 318 and 648);
- the earthwork remains of ridge and furrow near to Great Staughton (Asset 986) and Little Staughton (Asset 299); and the
- Last Straw Cottage (Asset 192), a building of local interest.

Impacts Scoped Out of Assessment

6.6.74 The ZTVs produced for the Scheme; including for the solar array and transformers (**ES Vol 3 Figure 5-3a** and **5-3b [EN010141/DR/6.3]**) and the BESS and East Park substation (**ES Vol 3 Figure 5-3c [EN010141/DR/6.3]**), indicate that there is very low potential for any visibility beyond 3 km. Consultation with Historic England, BBHET and CHET agreed the scoping in of three additional designated heritage assets (the grade I listed Church of St Leonard - Asset 985; the grade II* listed Warren House - Asset 984; and the grade II listed Priory Cottage - Asset 983 as noted above) beyond the 3 km study area, with all other heritage assets beyond this distance being scoped out.

6.6.75 A review of designated heritage assets within the 3 km study area (ES Vol 3 Figures 6-7 to 6-13 [EN010141/DR/6.3]) located beyond the ZTVs was undertaken to identify any assets which may be seen backdropped by the Scheme in key views toward them that could impact upon their settings (as noted above). All other assets outside the ZTVs have been scoped out but are still shown on ES Vol 3 Figures 6-7 to 6-13 [EN010141/DR/6.3] for completeness).

6.6.76 A review of the relative sensitivity of all non-designated heritage assets within the defined study areas has also been undertaken. Non-designated heritage assets of potentially national importance, with others agreed by consultation with the BBHET and CHET, have been scoped in to the assessment of

potential impacts upon setting (as per para 6.6.71). Impacts upon the settings of all other non-designated assets have been scoped out of this assessment.

Future Baseline

6.6.77 In the absence of the Scheme, it is anticipated that the only alteration to the cultural heritage baseline as presented in this chapter would be within newly Scheduled Roman Small Town south of Great Staughton (Asset 991, Scheduled in September 2024) where the land use would likely change from arable to pastoral use which may necessitate the area being surrounded by stock fencing. It is assumed that in the absence of the Scheme the wider area would continue in arable use and that, consequently, there would be continued and sustained direct impacts upon buried archaeological remains (with the exception of the scheduled area noted above) as a result of ploughing and other agricultural related ground breaking activities (land drain maintenance and installation etc.).

6.7 Embedded Mitigation and Enhancement Measures

Design Principles

6.7.1 The **Design Approach Document [EN010141/DR/5.6]** explains how the design of the Scheme has evolved from project inception through to submission of this application for development consent. The DAD sets out the project vision and design principles, the way the design has evolved, and how good design will be secured post-consent.

6.7.2 The design process has been led by competent design experts in consultation with the local community, local project stakeholders and statutory consultees to deliver on a design vision. Design decisions have been made in line with a series of project design principles that were prepared based on guidance set out by the Planning Inspectorate and the National Infrastructure Commission.

6.7.3 These design principles have evolved since the inception of the Scheme as an understanding of the project has also evolved, and in response to the EIA process. The design principles are as follows:

- **Design Principle 1**: The Scheme will seek opportunities to deliver solar development as efficiently as practicable to support national electricity network decarbonisation targets;
- **Design Principle 2**: The Scheme will be sensitive to landscape and views, and how people perceive the landscape;
- **Design Principle 3**: The Scheme will be sensitive to heritage assets, looking to protect the most valuable assets that contribute to a sense of place;
- **Design Principle 4**: The Scheme will be sensitive to biodiversity, and look to provide enhancement where possible;
- **Design Principle 5**: The Scheme will be sensitive to the water environment, looking to avoid harm to watercourses and improve water quality where practicable;

- **Design Principle 6**: The Scheme will be sensitive to local amenity and human health; and
- **Design Principle 7**: The Scheme will seek opportunities to leave a positive legacy through the delivery of multiple social and environmental benefits.

6.7.4 Of most relevance to the mitigation of cultural heritage and archaeological impacts and effects are Design Principles 2 and 3, of which the following sub-principles are of most relevance:

- **Principle 2.1:** Protect views towards tall church spires, which are visually prominent landmarks in the landscape and contribute towards creating a sense of place.
- **Principle 2.2:** Protect the sense of openness, wide views and skylines with long views from elevated positions across the Kym valley.
- **Principle 2.3:** Protect the pattern of dispersed farmsteads and rural villages with their distinctive structure of 'ends' and associated small irregular fields.
- **Principle 2.4:** Protect hedgerows and hedgerow trees.
- **Principle 3.1:** Protect the setting of the most significant built heritage assets, recognising the contribution that they make to local distinctiveness.
- **Principle 3.2:** Protect known and unknown archaeology through archaeological investigation and mitigation.
- **Principle 3.3:** Further our knowledge and understanding of the historic environment through transparency of research.

6.7.5 Section 5.6 of the **DAD [EN010141/DR/5.6]** sets out how the design of the Scheme has responded to each of the above principles, including specific consideration of the churches around the Site in relation to Principle 2.1. These design principles and the illustrative masterplan for the Scheme are embedded design measures. The design principles are included in the **Design Parameters and Principles Statement [EN010141/DR/7.1]**, which

is secured by a Requirement in Schedule 2 of the **draft DCO [EN010141/DR/3.1]**.

Outline Landscape and Ecological Management Plan

6.7.6 **ES Vol 3 Figure 2-1: Illustrative Environmental Masterplan [EN010141/DR/6.3]** illustrates the proposed landscape and visual mitigation for the Scheme. The landscape proposals are repeated on the Illustrative Landscape Proposals drawing at **Appendix A** of the **outline Landscape and Ecological Management Plan (oLEMP) [EN010141/DR/7.7]**. The oLEMP is a control document that will be certified as part of the Development Consent Order (DCO). Should the Scheme be consented, the DCO will require that a final Landscape and Ecological Management Plan (LEMP) in substantial accordance with this oLEMP is prepared prior to commencing the relevant construction phase, as secured by a Requirement in Schedule 2 of the draft **DCO [EN010141/DR/3.1]**. The final landscape proposals must therefore be in substantial accordance with those shown on the Illustrative Landscape Proposals at **Appendix A** of the **oLEMP [EN010141/DR/7.7]**.

6.7.7 **ES Vol 3 Figure 2-1: Illustrative Environmental Masterplan [EN010141/DR/6.3]** is annotated to set out the purpose of the landscape proposals to meet the design principles and mitigate for the impacts of the Scheme, these include:

- Proposed hedgerows with trees for landscape integration, visual screening and habitat connectivity. In parts of the Site these have been provided to restore historic field boundaries; and
- Creation of species-diverse grassland meadow in Site C to remove the Roman small town to south of Great Staughton Scheduled Monument (Asset 991) from agricultural cultivation.

6.7.8 The layout of the Scheme has been designed to respect existing field boundaries (many of which are surviving remnants of post-medieval field systems) and includes elements of proposed landscaping between the areas

of panels and, in places, to create wide buffers from the areas of solar panels to the Scheme boundary.

6.7.9 These wider buffer areas are located in the western, southern and north-eastern parts of Site A; the south-western and south-eastern parts of Site B and the northern part (covering the extent of the newly Scheduled Roman small town south of Great Staughton - Asset 991) and the southern edge of Site C. These areas of green infrastructure would provide a wider boundary between the nearby built heritage in Pertenhall (north-eastern part of Site A), Keysoe (southern part of Site A and south-western part of Site B), Little Staughton (south-eastern part of Site B) and Great Staughton (northern part of Site C) as well as providing a wider buffer to two of the identified scheduled monuments to the south of Site C (the wider buffer along the southern edge of Site C). Where green infrastructure is proposed it is anticipated there would be limited impacts upon buried archaeological remains and it is also noted that, in some cases, the additional areas of green infrastructure would reduce the potential effects upon the settings of heritage assets. This is factored into the Assessment of Likely Impacts and Effects (Section 6.8), and the supporting appendices to this chapter.

6.7.10 Details regarding all new proposed landscape elements are included within the **oLEMP [EN010141/DR/7.7]**, which include new native species woodland or woodland belt; new native species hedgerows; new native species individual trees; new grazing pasture or neutral grassland; new species-diverse grassland; and proposed permissive paths.

Construction Phase

6.7.11 Embedded mitigation measures for the construction phase are secured by the adoption of the **oLEMP [EN010141/DR/7.7],** the **oAMS [EN010141/DR/7.15]** and an **outline Construction Environmental Management Plan (oCEMP) [EN010141/DR/7.3]**.

6.7.12 The **oCEMP [EN010141/DR/7.3]** is a control document that will be certified as part of the DCO. Should the Scheme be consented, the DCO will require

that a final Construction Environmental Management Plan (CEMP) in substantial accordance with this oCEMP is prepared prior to commencing construction of each phase of the Scheme, as secured by a Requirement in Schedule 2 of the **draft DCO [EN010141/DR/3.1]**.

6.7.13 Similar to the above, the **oAMS [EN010141/DR/7.15]** is a control document that will be certified as part of the DCO. Should the Scheme be consented, the DCO will require that a final Archaeological Mitigation Strategy in substantial accordance with the oAMS is prepared prior to commencing construction of each phase of the Scheme, as secured by a Requirement in Schedule 2 of the **draft DCO [EN010141/DR/3.1]**.

6.7.14 The **oCEMP [EN010141/DR/7.3]** includes commitments in relation to working around archaeological remains. These include specific measures in relation to the Roman small town to the south of Great Staughton Scheduled Monument (Asset 991) (see paragraph 6.7.21 onwards below), and other more general measures regarding identified archaeological remains.

6.7.15 These general measures include mitigation of direct effects set out within approved WSIs for the site preparation works archaeological investigation (including the trial trench investigations of Sites A, B, C and D which have been largely completed), with the outlined works being overseen by a suitably qualified Archaeological Clerk of Works (ACoW).

6.7.16 Based upon the works completed to date (September 2025), 42 AACs (see **oAMS [EN010141/DR/7.15]**) have been identified within the Scheme through non-intrusive investigations, and confirmed by evaluation trenching, as containing extensive or significant archaeological features. No dig solutions are proposed within 29 of these areas, subject to consultation with BBHET, CHET and HE as to the appropriateness of this approach in these areas. The proposed methodology for these *'No Dig solutions'* is set out in the **oAMS [EN010141/DR/7.15]**.

6.7.17 It is anticipated that the final number, size and layout of the AACs will be subject to change dependant on the completion of ongoing investigations

within Sites A, B, C and D (as well as future investigation within the cable connection routes and grid connection route).

6.7.18 The final proposals for archaeological mitigation will be determined based on the required further archaeological investigation, and following consultation with CHET, BBHET, and HE.

6.7.19 With regard to indirect effects the **oCEMP [EN010141/DR/7.3]** notes that a Surface Water Management Plan will be followed (in substantial accordance with the **outline Surface Water Management Plan [EN010141/DR/7.13]** submitted with the application) in order to prevent any surface water scouring and that as there are no significant excavations or underground obstructions that could affect groundwater movement, it is not anticipated that there would be any significant impacts on groundwater that could result in significant effects upon organic archaeological and palaeoenvironmental remains (*ibid*.).

6.7.20 With regard to temporary effects upon the setting of heritage assets within the construction phase the **oCEMP [EN010141/DR/7.3]** notes that best practice measures will be implemented to control noise, light, vibration, and vehicle movements (*ibid*.).

The Roman small town south of Great Staughton Scheduled Monument

6.7.21 As noted in the discussion of the baseline above, the geophysical survey undertaken by AOC identified an extensive area of archaeological activity within the northern part of Site C spreading across approximately 31ha which appears to reflect a well organised and advanced settlement (relating to the recorded cropmark Assets 629, 690, 707 & 710) of probable Romano-British date with a network of roads (including Asset 691), internal divisions, and possible central main square.

6.7.22 Early consultation with HE and CHET with regard to these findings was undertaken and the decision was taken, by the Applicant, to request the scheduling of the extent of the area. This scheduling request was submitted

to HE in May 2024 and the asset was Scheduled in September 2024 as the Roman small town south of Great Staughton (Asset 991).

6.7.23 The **oCEMP [EN010141/DR/7.3]** notes that the scheduled monument (Roman Small Town at Great Staughton) within Site C will be demarcated on Site and protected during construction, except in so far as the temporary access track that crosses it, and cabling works that will be horizontal directionally drilled beneath the archaeology.

6.7.24 These cabling works will be at a depth suitable (10m bgl) to avoid impact to the archaeology and the installation of the temporary access track will be undertaken with oversight from an ACoW to ensure suitable installation methods that avoid damage to the archaeology. Further detail of the construction technique and methodology to be employed in relation to the temporary access track and HDD within the scheduled area is outlined in Section 7.3 of the **oAMS [EN010141/DR/7.15]**. There would be no excavation works within areas identified as scheduled monuments. Direct impacts upon the remains with the Scheduled area would, therefore, be avoided by design.

Operational Phase

6.7.25 The Applicant has prepared an **outline Operational Environmental Management Plan (oOEMP) [EN010141/DR/7.5]** as part of the application for development consent. The oOEMP is a control document that will be certified as part of the DCO. Should the Scheme be consented, the DCO will require that a final Operational Environmental Management Plan (OEMP) in substantial accordance with this oOEMP is prepared prior to commencing the operational phase, as secured by a Requirement in Schedule 2 of the **draft DCO [EN010141/DR/3.1]**.

6.7.26 The management and maintenance of the Scheme's proposed landscaping and green infrastructure is secured by the requirements of the **oLEMP [EN010141/DR/7.7]**. This ensures the proposed landscaping is successful in establishing and can be relied on as embedded mitigation.

6.7.27 The **oOEMP [EN010141/DR/7.5]** also notes that best practice measures will be implemented to control noise, light, vibration, and vehicle movements during the operational phase, and that these measures will be monitored as per the details set out within the oOEMP.

Decommissioning Phase

6.7.28 The Applicant has prepared an **outline Decommissioning Environmental Management Plan (oDEMP) [EN010141/DR/7.5]** as part of the application for development consent. The oDEMP is a control document that will be certified as part of the DCO. Should the Scheme be consented, the DCO will require that a final Decommissioning Environmental Management Plan (DEMP) in substantial accordance with this oDEMP is prepared prior to commencing the decommissioning phase, as secured by a Requirement in Schedule 2 of the **draft DCO [EN010141/DR/3.1]**.

6.7.29 The **oDEMP [EN010141/DR/7.5]** includes measures in relation to decommissioning works around archaeological remains.

6.7.30 The oDEMP notes that the scheduled monument adjacent to the southern boundary of Site C and the Roman small town at Great Staughton Scheduled Monument (Asset 991) within Site C will be demarcated and protected during decommissioning and that there will be no excavation within areas identified as scheduled monuments.

6.7.31 With regard to potential direct effects, it goes on to state that it is not expected that the decommissioning phase would have any impact beyond the impacts from the construction phase of the Scheme and that no previously undisturbed land would be disturbed during decommissioning. Where AACs have been identified the archaeology will continue to be preserved in-situ through careful removal of the components of the Scheme. Section 7.5 of the **oAMS [EN010141/DR/7.15]** includes further details in relation to the approach to decommissioning.

6.7.32 With regard to temporary effects upon the setting of heritage assets during the decommissioning phase the oDEMP notes that best practice measures will be implemented to control noise, light, vibration, and vehicle movements.

Enhancement Measures

6.7.33 All reporting and archives prepared for the Site will be made available through appropriate channels. The reports will be submitted to the CHER and BBHER which is a publicly available record. The archive (digital and physical) will also be deposited with the Archaeology Data Service.

6.7.34 Digital copies of the reports can be offered to local history websites to make them freely available via the internet.

6.7.35 It is envisaged that some archaeological mitigation works would include a limited number of public participation and training events, which could include community groups, educational or other institutional groups or interested individuals. The precise scope of public engagement would be further refined in consultation with CHET, BBHET, and HE.

6.7.36 The Applicant has prepared an **outline Heritage Enhancement Strategy (oHES) [EN010141/DR/7.16]** as part of the application for development consent. This plan sets out how the Applicant intends to increase the understanding, experience and appreciation of the historic environment and thus provide enhancement and public benefit, and secures the enhancements set out in the above paragraphs.

6.8 Assessment of Likely Impacts and Effects

Construction Phase

6.8.1 The Scheme includes the establishment of the ground mounted solar photovoltaic generating station across Sites A to D; the East Park BESS and East Park Substation within Site D and a 400 kV electrical cable connection to National Grid's Eaton Socon Substation. The Scheme would also include the works to lay internal cabling and build ancillary infrastructure, to create temporary construction and decommissioning compounds and laydown areas, and to facilitate access. The work packages for the Scheme are detailed in **ES Vol 1 Chapter 2 [EN010141/DR/6.1]** and it is considered that these construction works have the potential to directly impact upon buried cultural heritage remains (both known and unknown).

6.8.2 The Scheme also includes works associated with the retention of existing green infrastructure and creation of new green infrastructure across the Scheme. This will include the enhancement of existing green infrastructure across the Scheme, the establishment of new hedgerows with trees and woodland belts along existing (or historic) field boundaries across the Scheme (and to provide screening for the public rights of way that run through Sites A and B) and areas of diverse grassland meadows in the southwestern and southern parts of Site A; throughout Site B with larger areas proposed in the southwest and southeast; in the northern (covering the extent of the Roman small town south of Great Staughton Scheduled Monument – Asset 991) and southern parts of Site C and along the northern and southern edges of Site D (**ES Vol 3 Figure 2-1 [EN010141/DR/6.3]**).

6.8.3 It is not considered that any works associated with the enhancement of existing green infrastructure (hedgerows and areas of woodland), or the establishment of diverse grassland meadows would directly impact upon cultural heritage remains (both known and unknown).

6.8.4 The development of new hedgerows with associated tree planting and areas of woodland that are along existing (or historic) field boundaries is considered

to have a very low potential for impacts upon cultural heritage remains (both known and unknown), and given the arable land use across the Site, any such impacts are considered unlikely to exceed the effects of regular ploughing.

6.8.5 The potential impacts of new planting of woodland and hedgerow screening (in areas that do not appear to have historically contained these elements) have been considered in the impact assessment.

6.8.6 It is not considered that any works associated with the retention or creation of green infrastructure within the Scheme would result in enough of a visual change to impact upon the settings (either adverse or beneficial) of any designated heritage assets.

Direct Effects

6.8.7 The significance of likely direct effects upon buried archaeological remains within the Scheme is outlined in the following sections and tables which separate the discussion by relevant East Park Site area.

Site A

6.8.8 The proposed construction works within Site A would establish 13 separate areas of ground mounted solar photovoltaic generating station with associated inverters and transformers, security fences and access tracks (these impacts are collectively referred to in Table 6.9 below as being within areas of solar photovoltaic generating station) where construction would be facilitated by the establishment of three temporary construction compounds. The design also includes landscaping and habitat creation within the western, south-eastern and central parts of the scheme, and between the areas of solar panels.

Table 6.9: Likely Direct Effects within Site A

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
HER recorded Prehistoric hut circles (Asset 210) and associated geophysical anomalies 41a (Appendix 6-5) Trenches 126 to 130, 132, 134 to 136, 139 to 146 and 148 may have recorded related archaeological remains	Construction impacts related to being within area of temporary works compound and solar photovoltaic generating station.	Medium	None (no dig solution is proposed for AAC-A-5a)	None (no dig solution is proposed for AAC-A-5a)	Not Significant in EIA terms (no dig solution is proposed for AAC-A-5a)
HER recorded Prehistoric hut circles (Asset 210) and associated geophysical anomalies 41a (Appendix 6-5) Trenches 126 to 130, 132, 134 to 136, 139 to 146 and 148 may have recorded related archaeological remains	Direct impacts arising from the planting of hedgerows and woodland to provide screening within southern part of Site C	Medium	Medium (area assigned as AAC-A-5b)	Moderate	Significant in EIA terms

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
HER recorded remains of the extent of a medieval deer park (centred Asset 515 and also recorded by the HER as Asset 514).	No construction related impacts anticipated as asset located within area of proposed meadow.	Low	None	None	Not Significant in EIA terms
HER recorded remains of post-medieval farm building (Asset 178) No related remains identified within trench 153	Construction impacts related to being within area of solar photovoltaic generating station.	Negligible	None (no dig solution is proposed for AAC-A-5a)	None (no dig solution is proposed for AAC-A-5a)	Not Significant in EIA terms
HER recorded remains of post-medieval farm building (Asset 188)	No construction related impacts anticipated as asset located within area of proposed meadow.	Negligible	None	None	Not Significant in EIA terms
HER recorded remains of post-medieval farm building (Asset 321) and geophysical anomaly (Anomaly 41c, Appendix 6-5) No related remains identified within trench 153	Direct impacts arising from the planting of hedgerows and woodland to provide screening within southern part of Site C.	Negligible	Medium (area assigned as AAC-A-5b)	Negligible	Not Significant in EIA terms

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
HER recorded remains of post-medieval farm building (Asset 736)	No construction related impacts anticipated as asset is an extant building located just beyond the boundary of Scheme.	Negligible	None	None	Not Significant in EIA terms
HER recorded remains of post-medieval farm building (Asset 737).	No construction related impacts anticipated as asset is an extant building asset located just beyond the boundary of Scheme,	Negligible	None	None	Not Significant in EIA terms
HER recorded remains of a post-medieval fishpond (Asset 438)	No construction related impacts anticipated as asset located within area of proposed meadow.	Negligible	None	None	Not Significant in EIA terms
HER recorded remains of post-medieval rabbit warren (Asset 335)	No construction related impacts anticipated as asset located within area of proposed meadow.	Negligible	None	None	Not Significant in EIA terms

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
HER recorded remains of post-medieval extraction pits (Asset 173) and geophysical anomaly (Anomaly 41b, Appendix 6-5) Trench 136 contained remains associated with quarrying activity.	Construction impacts related to being within area of solar photovoltaic generating station.	Negligible	None (no dig solution is proposed for AAC-A-5a)	None (no dig solution is proposed for AAC-A-5a)	Not Significant in EIA terms
HER recorded field name *'Brick Pastures'* (Asset 333) Trenches 100 to 102 and 107 to 108 have recorded archaeological remains, though these appear earlier in date than the described Asset	Construction related impacts related to being within area of solar photovoltaic generating station.	Negligible (Place name record)	None (no dig solution is proposed for AAC-A-4)	None (no dig solution is proposed for AAC-A-4)	Not Significant in EIA terms
HER and historic cartography recorded post-medieval route (Asset 860)	Construction related impacts related to being within area of solar photovoltaic generating station.	Negligible (route appears to follow existing trackway)	Medium	Negligible	Not Significant in EIA terms
HER and National Mapping	Construction impacts related to	Negligible	None (only small portion of	None	Not Significant in EIA terms

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
Project data recorded area of levelled medieval ridge and furrow (Asset 814) No associated remains were identified within trenches 5 to 10	being within area of solar photovoltaic generating station.		ridge and furrow area within development areas and no trace of buried remains was identified within the trenching of the area)		
HER and National Mapping Project data recorded area of levelled post-medieval ridge and furrow (Asset 815) One furrow is recorded within trench 37, rest of the trenches excavated within its extent. contained no remains.	Construction impacts related to being within area of temporary works compound and solar photovoltaic generating station.	Negligible	Negligible (very few traces of buried remains were identified within the trenching of the area)	Negligible	Not Significant in EIA terms
HER and National Mapping Project data recorded area of levelled medieval ridge and furrow (Asset 816) No associated remains were identified	Construction impacts related to being within area of solar photovoltaic generating station.	Negligible	None (only small portion of ridge and furrow area within development areas and no trace of buried remains was identified within the trenching of this area)	None	Not Significant in EIA terms

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
within trench 124					
Cartographic record of a former post-medieval farm building (Asset 176) and associated geophysical anomaly (Anomaly 37a, Appendix 6-5)	No construction related impacts anticipated as asset located within area of proposed meadow.	Negligible	None	None	Not Significant in EIA terms
Geophysical enclosure system anomalies (Anomalies 31a and 31b, Appendix 6-5) trenches 172 and 182 recorded archaeological remains of potential late prehistoric / Romano-British date	Construction impacts related to being within areas of solar photovoltaic generating station.	Medium	None (no dig solution is proposed for AAC-A-6a)	None (no dig solution is proposed for AAC-A-6a)	Not Significant in EIA terms (no dig solution is proposed for AAC-A-6a)
Geophysical enclosure system anomalies (Anomalies 31a and 31b, Appendix 6-5) Trenches 172 and 182 recorded archaeological remains of potential late prehistoric / Romano-British date	Direct impacts arising from the planting of a woodland belt along the eastern edge of the road for screening purposes.	Medium	Medium (located within AAC-A-6b)	Moderate	Significant in EIA terms

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
Geophysical linear enclosure anomalies (Anomaly 34a, Appendix 6-5) Trenches 11 and 14 have recorded related archaeological remains	Construction impacts related to being within area of solar photovoltaic generating station.	Medium	None (no dig solution is proposed for AAC-A-1)	None (no dig solution is proposed for AAC-A-1)	Not Significant in EIA terms (no dig solution is proposed for AAC-A-1)
Geophysical linear enclosure anomalies (Anomaly 38a Appendix 6-5) Trenches 66 to 69 and 71 have recorded related archaeological remains	Construction impacts related to being within area of solar photovoltaic generating station.	Medium	None (no dig solution is proposed for AAC-A-3a)	None (no dig solution is proposed for AAC-A-3a)	Not Significant in EIA terms (no dig solution is proposed for AAC-A-3a)
Geophysical linear enclosure anomalies (Anomaly 38a Appendix 6-5) Trenches 66 to 69 and 71 have recorded related archaeological remains	Direct impacts arising from the planting of hedgerows and woodland to provide screening within western part of Site C	Medium	Medium (area assigned as AAC-A-3b)	Moderate	Significant in EIA terms
Geophysical settlement enclosure anomalies (Anomaly 36a Appendix 6-5)	Construction impacts related to being within area of solar photovoltaic	Medium	None (no dig solution is proposed for AAC-A-2a)	None (no dig solution is proposed for AAC-A-2a)	Not Significant in EIA terms (no dig solution is proposed for AAC-A-2a)

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
Trenches 42, 43, 45 to 49 and 53 have recorded related archaeological remains	generating station.				
Geophysical settlement enclosure anomalies (Anomaly 36a Appendix 6-5) Trenches 42, 43, 45 to 49 and 53 have recorded related archaeological remains	Direct impacts arising from the planting of hedgerows and woodland to provide screening within western part of Site C	Medium	Medium (area assigned as AAC-A-2b)	Moderate	Significant in EIA terms
Geophysical settlement enclosure anomalies (Anomaly 39a Appendix 6-5) Trenches 100 to 102, 107 and 108 have recorded related archaeological remains	Construction impacts related to being within area of solar photovoltaic generating station.	Medium	None (no dig solution is proposed for AAC-A-4)	None (no dig solution is proposed for AAC-A-4)	Not Significant in EIA terms (no dig solution is proposed for AAC-A-4)
Geophysical anomalies thought to potentially be archaeological (Anomaly 34b, Appendix 6-5). No archaeological remains identified	Construction impacts related to being within area of solar photovoltaic generating station.	None (anomalies do not appear to be archaeological in nature)	None (anomalies do not appear to be archaeological in nature)	None (anomalies do not appear to be archaeological in nature)	Not Significant in EIA terms

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
within trenches 17 to 19.					
Geophysical anomalies thought to potentially be archaeological (Anomaly 34b, Appendix 6-5). No archaeological remains identified within trenches 17 to 19.	Direct impacts arising from the planting of woodland and hedgerows that form part of the screening for the public footpath.	None (anomalies do not appear to be archaeological in nature)	None (anomalies do not appear to be archaeological in nature)	None (anomalies do not appear to be archaeological in nature)	Not Significant in EIA terms
Geophysical anomalies thought to potentially be archaeological (Anomaly 34c, Appendix 6-5). No archaeological remains identified within trenches 6 to 8.	Construction impacts related to being within area of solar photovoltaic generating station.	None (anomalies do not appear to be archaeological in nature)	None (anomalies do not appear to be archaeological in nature)	None (anomalies do not appear to be archaeological in nature)	Not Significant in EIA terms
Geophysical anomalies thought to potentially be archaeological (Anomaly 34d, Appendix 6-5). Shallow undated ditch feature	Construction impacts related to being within area of solar photovoltaic generating station.	Low (isolated linear feature, even if prehistoric in date does not appear to be related to any settlement activity)	Medium	Minor	Not Significant in EIA terms

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
recorded in trench 33					
Geophysical anomalies thought to potentially be archaeological (Anomaly 34d, Appendix 6-5). Shallow undated ditch feature recorded in trench 33	Direct impacts arising from the planting of woodland and hedgerows that form part of the screening for the public footpath.	Low (isolated linear feature, even if prehistoric in date does not appear to be related to any settlement activity)	Medium	Minor	Not Significant in EIA terms
Geophysical anomalies thought to potentially be archaeological (Anomaly 35a, Appendix 6-5). No archaeological remains identified within trenches 55 to 57.	Construction impacts related to being within area of solar photovoltaic generating station.	None (anomalies do not appear to be archaeological in nature)	None (anomalies do not appear to be archaeological in nature)	None (anomalies do not appear to be archaeological in nature)	Not Significant in EIA terms
Geophysical anomalies thought to potentially be archaeological (Anomaly 36b, Appendix 6-5).	Construction impacts related to being within area of solar photovoltaic generating station.	Medium	None (no dig solution is proposed for AAC-A-2a)	None (no dig solution is proposed for AAC-A-2a)	Not Significant in EIA terms (no dig solution is proposed for AAC-A-2a)

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
Trench 49 contained remains of a ditch (likely associated with other features within AAC-A-2a), trench 52 to northeast (outside AAC area) contained no associated remains.					
Geophysical anomalies thought to potentially be archaeological (Anomaly 36b, Appendix 6-5). trench 49 contained remains of a ditch (likely associated with other features within AAC-A-2a), trench 52 to northeast (outside AAC area) contained no associated remains.	Direct impacts arising from the planting of hedgerows and woodland to provide screening within western part of Site C	Medium	Medium (area containing related features assigned as AAC-A-2b)	Moderate	Significant in EIA terms
Geophysical anomalies thought to potentially be archaeological (Anomaly 38b, Appendix 6-5).	No construction impacts anticipated as asset located within area of proposed meadow.	Unknown	None	None	Not Significant in EIA terms

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
Geophysical anomalies thought to potentially be archaeological (Anomaly 39b, Appendix 6-5). Shallow undated ditch feature recorded in trench 118	Construction impacts related to being within area of solar photovoltaic generating station. Direct impacts arising from the planting of a woodland belt along the eastern edge of the development area for screening purposes.	Low (isolated linear feature, even if prehistoric in date does not appear to be related to any settlement activity)	Medium	Minor	Not Significant in EIA terms
Geophysical anomalies thought to potentially be archaeological (Anomaly 39b, Appendix 6-5). Shallow undated ditch feature recorded in trench 118	Direct impacts arising from the planting of a woodland belt along the eastern edge of the development area for screening purposes.	Low (isolated linear feature, even if prehistoric in date does not appear to be related to any settlement activity)	Medium	Minor	Not Significant in EIA terms
Undated curvilinear ditch and pit recorded in trench 11	Construction impacts related to being within area of solar photovoltaic generating station.	Low (isolated features, even if prehistoric in date do not appear to be related to any	Medium	Minor	Not Significant in EIA terms

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
		settlement activity)			
Undated curvilinear tree bowl and pit recorded in trench 23	Construction impacts related to being within area of solar photovoltaic generating station.	Low (isolated pit feature, even if prehistoric in date it does not appear to be related to any settlement activity)	Medium	Minor	Not Significant in EIA terms
Undated pit recorded in trench 35	Construction impacts related to being within area of solar photovoltaic generating station.	Low (isolated pit feature, even if prehistoric in date it does not appear to be related to any settlement activity)	Medium	Minor	Not Significant in EIA terms
Undated gully and furrow remains recorded within trench 59	Construction impacts related to being within area of solar photovoltaic generating station.	Low (isolated gully feature, even if prehistoric in date it does not appear to be related to any settlement activity)	Medium	Minor	Not Significant in EIA terms
Undated shallow ditch and furrows recorded within trench 63	Construction impacts related to being within area of solar photovoltaic generating station.	Low (isolated ditch feature, even if prehistoric in date it does not appear to be related to any	Medium	Minor	Not Significant in EIA terms

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
		settlement activity)			
Undated furrow recorded within trench 105	Construction impacts related to being within area of solar photovoltaic generating station.	Negligible	Medium	Negligible	Not Significant in EIA terms
Undated posthole recorded in trench 109	Construction impacts related to being within area of solar photovoltaic generating station.	Low (isolated post hole feature, even if prehistoric in date it does not appear to be related to any settlement activity)	Medium	Minor	Not Significant in EIA terms
Undated gully recorded in trench 110	Construction impacts related to being within area of solar photovoltaic generating station.	Low (isolated gully feature, even if prehistoric in date it does not appear to be related to any settlement activity)	Medium	Minor	Not Significant in EIA terms
Undated gully recorded in trench 112	Construction impacts related to being within area of solar photovoltaic generating station.	Low (isolated gully feature, even if prehistoric in date it does not appear to be related to any	Medium	Minor	Not Significant in EIA terms

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
		settlement activity)			
Undated ditch recorded in trench 158	Construction impacts related to being within area of solar photovoltaic generating station.	Low (isolated ditch feature, even if prehistoric in date it does not appear to be related to any settlement activity)	Medium	Minor	Not Significant in EIA terms
Undated ditch recorded in trench 162	Construction impacts related to being within area of solar photovoltaic generating station.	Low (isolated ditch feature, even if prehistoric in date it does not appear to be related to any settlement activity)	Medium	Minor	Not Significant in EIA terms

6.8.9 Most of the predicted direct effects within Site A are not significant in EIA terms.

6.8.10 The completed trial trenching to date (September 2025) within Site A has enabled the identification of 10 AACs, all of which have directly correlated with previously identified HER assets and geophysical anomalies (see Table 6.9 above). Given the results of the trial trenching no dig solutions are proposed within six of these areas (AAC-A-1; AAC-A-2; AAC-A-3a; AAC-A-4, AAC-A-5a, and AAC-A-6a), subject to consultation with BBHET as to the appropriateness of this approach in these areas. If no dig solutions can be utilised no further impacts are predicted and there would be no further direct effects upon archaeological remains within those areas.

6.8.11 Four of the areas (AAC-A-2b, AAC-A-3b, AAC-A-5b, and AAC-A-6b) are located within areas which are proposed for woodland and hedgerow enhancement which is required to mitigate impact upon a number or other environmental receptors, including in some cases impacts upon the settings of designated heritage assets. Such planting cannot be mitigated by '*no-dig solutions*' and, therefore, would result in moderate direct effects upon the archaeological remains within these areas. These remains include the HER recorded Prehistoric hut circles (Asset 210) and associated geophysical anomalies 41a (**ES Vol 2 Appendix 6-5 [EN010141/DR/6.2]**), geophysical linear enclosure anomalies (Anomaly 38a, **ES Vol 2 Appendix 6-5 [EN010141/DR/6.2]**) and settlement enclosure anomalies (Anomalies 31a, 31b, 36a and 36b, **ES Vol 2 Appendix 6-5 [EN010141/DR/6.2]**). These predicted moderate direct effects are significant in EIA terms.

6.8.12 It is anticipated that the final number, size and layout of the AACs noted above will be subject to change dependant on the results of ongoing investigations within Site A and following consultation with BBHET.

6.8.13 The additional mitigation recommended in relation to identified levels of effect is outlined in Section 6.9 below.

Site B

6.8.14 The proposed construction works within Site B would establish 29 separate areas of ground mounted solar photovoltaic generating station with associated inverters and transformers, security fences and access tracks (these impacts are collectively referred to in Table 6.10 below as being within areas of solar photovoltaic generating station) where construction would be facilitated by the establishment of five temporary construction compounds. The design also includes landscaping and habitat creation within the south-western part of the Scheme, and between the areas of solar panels.

Table 6.10: Likely Direct Effects within Site B

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
HER recorded cropmarks of a Bronze Age and/or Iron Age ring ditch (Asset 279)	No construction related impacts anticipated as asset located within area of proposed meadow.	Medium	None	None	Not Significant in EIA terms
HER recorded cropmarks of potential Iron Age and/or Romano-British enclosures / settlement (Asset 218) Neither geophysical survey or trial trenching (trenches 606 and 607) identified any archaeological remains at this location	Potential cropmark features not identified during investigations.	None	None	None	Not Significant in EIA terms
HER recorded cropmarks of potential Iron Age and/or Romano-British enclosures / settlements (Asset 219) and geophysical anomalies (Anomaly 20a, Appendix 6-5) Trenches 506, 507, 512 to 514, 516 to	Construction impacts related to being within areas of solar photovoltaic generating station.	Medium	None (no dig solution is proposed for AAC-B-6a)	None (no dig solution is proposed for AAC-B-6a)	Not Significant in EIA terms (no dig solution is proposed for AAC-B-6a)

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
517 and 519 to 522 recorded archaeological remains of potential late prehistoric / Romano-British date					
HER recorded cropmarks of potential Iron Age and/or Romano-British enclosures / settlements (Asset 219) and geophysical anomalies (Anomaly 20a, Appendix 6-5) Trenches 506, 507, 512 to 514, 516 to 517 and 519 to 522 recorded archaeological remains of potential late prehistoric / Romano-British date	Direct impacts arising from the planting of a hedgerow and woodland belt along the southern edge of Site B area for screening purposes.	Medium	Medium (area containing related features assigned as AAC-B-6b)	Moderate	Significant in EIA terms
HER recorded cropmarks of potential Iron Age and/or Romano-British enclosures / settlements (Asset 237) and geophysical enclosure system	Construction impacts related to being within areas of solar photovoltaic generating station.	Medium	None (no dig solution is proposed for AAC-B-8)	None (no dig solution is proposed for AAC-B-8)	Not Significant in EIA terms (no dig solution is proposed for AAC-B-8)

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
anomalies (Anomaly 28b, Appendix 6-5) Trenches 634 and 635 recorded archaeological remains of potential late prehistoric / Romano-British date					
HER recorded cropmarks of potential Iron Age and/or Romano-British enclosures / settlements (Asset 273) Trench 223, identified a shallow gully which may be related though none of the other trenches within the cropmark area identified any remains at this location	Potential cropmark feature not identified during investigations	Low (isolated ditch feature, even if prehistoric in date it does not appear to be related to any settlement activity)	Medium	Minor	Not Significant in EIA terms
HER recorded cropmarks of potential Iron Age and/or Romano-British enclosures / settlements (Asset 274) and geophysical anomalies (Anomaly 27a	Construction impacts related to being within areas of solar photovoltaic generating station.	Medium	None (no dig solution is proposed for AAC-B-10A)	None (no dig solution is proposed for AAC-B-10a)	Not Significant in EIA terms (no dig solution is proposed for AAC-B-10a)

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
and 27b, Appendix 6-5) Trenches 625 to 630 recorded archaeological remains of potential late prehistoric / Romano-British date					
HER recorded cropmarks of potential Iron Age and/or Romano-British enclosures / settlements (Asset 274) and geophysical anomalies (Anomaly 27a and 27b, Appendix 6-5) Trenches 625 to 630 recorded archaeological remains of potential late prehistoric / Romano-British date	Direct impacts arising from the planting of a hedgerow and woodland belt in the northern part of Site B area for screening purposes.	Medium	Medium (area containing related features assigned as AAC-B-10b)	Moderate	Significant in EIA terms
HER recorded cropmarks of potential Iron Age and/or Romano-British enclosures / settlements (Asset 275) and geophysical anomalies (Anomalies	Construction impacts related to being within areas of solar photovoltaic generating station.	Medium	None (no dig solution is proposed for AAC-B-5a)	None (no dig solution is proposed for AAC-B-5a)	Not Significant in EIA terms (no dig solution is proposed for AAC-B-5a)

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
18a, 18b and 18c, Appendix 6-5) Trenches 482, 484, 485, 490, 492, 494, 495 to 497 and 502 recorded archaeological remains of potential late prehistoric / Romano-British date					
HER recorded cropmarks of potential Iron Age and/or Romano-British enclosures / settlements (Asset 275) and geophysical anomalies (Anomalies 18a, 18b and 18c, Appendix 6-5) Trenches 482, 484, 485, 490, 492, 494, 495 to 497 and 502 recorded archaeological remains of potential late prehistoric / Romano-British date	Direct impacts arising from the planting of a hedgerow and woodland belt in the southern edge of Site B area for screening purposes.	Medium	Medium (area containing related features assigned as AAC-B-5b)	Moderate	Significant in EIA terms
HER record of a former gravel pit (Asset 338) and geophysical anomaly	Construction impacts related to being within areas of solar photovoltaic	Negligible	Negligible (trenching undertaken has not identified any remains)	Negligible	Not Significant in EIA terms

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
(Anomaly 30a, Appendix 6-5) No trial trenching (trenches 610 to 615) identified any archaeological remains at this location	generating station.				
HER record of a former gravel pit (Asset 340) and geophysical anomaly (Anomaly 27c, Appendix 6-5) No related remains were identified within trenches 621 or 622	Construction impacts related to being within areas of solar photovoltaic generating station.	Negligible	Medium	Negligible	Not Significant in EIA terms
HER and cartographic record of historic route between of Keysoe and Green End (Asset 861) Neither geophysical survey nor trial trenching has picked up any indication of this route.	Historically mapped feature not identified during investigations	Low	None	None	Not Significant in EIA terms

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
HER and National Mapping Programme record of area of ridge and furrow (Asset 817) No related remains were identified within the trial trenching excavated within this area	Construction impacts related to being within areas of solar photovoltaic generating station.	Negligible	None (no dig solution is proposed for AAC-B-1a and AAC-B-2a)	None (no dig solution is proposed for AAC-B-1a and AAC-B-2a)	Not Significant in EIA terms
HER and National Mapping Programme record of area of ridge and furrow (Asset 818) Neither geophysical survey nor trial trenching (trenches 388 to 397) recorded any ridge and furrow remains in this area	Construction impacts related to being within area of temporary works compound and solar photovoltaic generating station.	Negligible	None (trenching undertaken has not identified any remains)	None	Not Significant in EIA terms
HER and National Mapping Programme record of area of former field boundary bank / furlong (Asset 819) Geophysical survey picked	Construction impacts related to being within areas of temporary works compound and solar photovoltaic generating station.	Negligible	None (none of trenches undertaken within recorded extent identified any related remains)	None	Not Significant in EIA terms

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
up anomalies thought likely to be related though no related remains were identified within the trial trenching excavated within this area.					
HER and National Mapping Programme record of area of former field boundary bank / furlong (Asset 821) Neither geophysical survey nor trial trenching (trenches 342 to 346) recorded any related remains	Construction impacts related to being within areas of solar photovoltaic generating station.	Negligible	None (trenching undertaken has not identified any remains)	None	Not Significant in EIA terms
HER and National Mapping Programme record of area of former field boundary bank / furlong (Asset 822) Neither geophysical survey nor trial trenching (trenches 404, 413, 417 to 417, 419 and 421 to 425)	Construction impacts related to being within area of temporary works compound and solar photovoltaic generating station.	Negligible	None (trenching undertaken has not identified any remains)	None	Not Significant in EIA terms

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
recorded any related remains					
HER and National Mapping Programme record of area of former field boundary bank / furlong (Asset 823) Neither geophysical survey nor trial trenching recorded any related remains.	Construction impacts related to being within area of temporary works compound and solar photovoltaic generating station.	Negligible	None (trenching undertaken has not identified any remains)	None	Not Significant in EIA terms
HER and National Mapping Programme record of area of former field boundary bank / furlong (Asset 824) Neither geophysical survey nor trial trenching (trenches 539 to 541, 604 and 606) recorded any related remains	Construction impacts related to being within area of temporary works compound and solar photovoltaic generating station.	Negligible	None (trenching undertaken has not identified any remains)	None	Not Significant in EIA terms

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
HER and National Mapping Programme record of area of ridge and furrow (Asset 826) Furrows were recorded in trenches 673, 675, 677, 678 and 679 .	Construction impacts related to being within areas of solar photovoltaic generating station.	Negligible	Medium	Negligible	Not Significant in EIA terms
HER and National Mapping Programme record of area of former field boundary bank / furlong (Asset 825) Neither geophysical survey nor trial trenching recorded any related remains.	Construction impacts related to being within areas of temporary works compound and solar photovoltaic generating station.	Negligible	None (trenching undertaken has not identified any remains)	None	Not Significant in EIA terms
HER and National Mapping Programme record of area of former field boundary bank / furlong (Asset 827) No trace of feature identified within geophysical survey or trial trench 544	Construction related impacts related to being within areas of solar photovoltaic generating station.	Negligible	None (Most of asset outside the redline boundary of the Scheme)	None	Not Significant in EIA terms

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
HER and National Mapping Programme record of area of former field boundary bank / furlong (Asset 828) No trace of feature identified within geophysical survey or trial trench 546	Construction impacts related to being within areas of solar photovoltaic generating station.	Negligible	None (Most of asset outside the redline boundary of the Scheme)	None	Not Significant in EIA terms
HER and National Mapping Programme record of area of ridge and furrow (Asset 829)	No construction related impacts anticipated as asset located within area of proposed meadow.	Negligible	None	None	Not Significant in EIA terms
HER and cartographic record of historic route (Asset 858, along B660) and former milestone (Asset 455)	Extant route and former location of milestone within Scheme boundary but outside development areas (route is the B660 which is not being impacted)	Low	None	None	Not Significant in EIA terms
HER recorded findspots within Site B (Assets 740-749)	Findspots are records of recovered surface finds that cannot be impacted	N/A	None (findspots no longer present)	None	Not Significant in EIA terms

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
Geophysical enclosure system anomalies (Anomaly 7a, Appendix 6-5) Trenches 193-198, 200, 201, 207, 210 and 211 recorded archaeological remains of potential late prehistoric / Romano-British date	Construction impacts related to being within areas of solar photovoltaic generating station.	Medium	None (no dig solution is proposed for AAC-B-1a and AAC-B-2a)	None (no dig solution is proposed for AAC-B-1a and AAC-B-2a)	Not Significant in EIA terms (no dig solution is proposed for AAC-B-1a and AAC-B-2a)
Geophysical enclosure system anomalies (Anomaly 7a, Appendix 6-5) Trenches 193-198, 200, 201, 207, 210 and 211 recorded archaeological remains of potential late prehistoric / Romano-British date	Direct impacts arising from the planting of a woodland belt along the eastern edge of the road for screening purposes	Medium	Medium (located within AAC-B-1b and AAC-B-2b)	Moderate	Significant in EIA terms
Geophysical enclosure system anomalies (Anomaly 10a, Appendix 6-5) Trenches 398, 407 and 409 recorded archaeological remains of potential late prehistoric / Romano-British date	Construction impacts related to being within areas of solar photovoltaic generating station.	Medium	None (no dig solution is proposed for AAC-B-3)	None (no dig solution is proposed for AAC-B-3)	Not Significant in EIA terms (no dig solution is proposed for AAC-B-3)

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
Geophysical enclosure system anomalies (Anomaly 11a, Appendix 6-5) Trenches 427, 428 and 438 recorded archaeological remains of potential late prehistoric / Romano-British date.	Construction impacts related to being within areas of solar photovoltaic generating station.	Medium	None (no dig solution is proposed for AAC-B-7)	None (no dig solution is proposed for AAC-B-7)	Not Significant in EIA terms (no dig solution is proposed for AAC-B-7)
Geophysical enclosure system anomalies (Anomaly 11b, Appendix 6-5) Most of trial trenching in area (Trenches 436, 441 to 444 and 446 to 448) has not recorded any related remains. Trench 445 identified an isolated pit feature.	Construction impacts related to being within areas of solar photovoltaic generating station.	Low (isolated pit feature of limited extent)	Medium	Minor	Not Significant in EIA terms
Geophysical enclosure system anomalies (Anomaly 12a, Appendix 6-5) Trench 393 recorded archaeological remains of potential late	No construction related impacts anticipated as asset located within area of proposed meadow.	Medium	None	None	Not Significant in EIA terms

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
prehistoric / Romano-British date.					
Geophysical enclosure system anomalies (Anomaly 21a, Appendix 6-5) Trenches 582, 587 and 588 recorded archaeological remains of potential late prehistoric / Romano-British date	Construction impacts related to being within areas of solar photovoltaic generating station.	Medium	None (no dig solution is proposed for AAC-B-12)	None (no dig solution is proposed for AAC-B-12)	Not Significant in EIA terms (no dig solution is proposed for AAC-B-12)
Geophysical enclosure system anomalies (Anomaly 21c, Appendix 6-5)	Construction impacts related to construction of a fence line for an area of solar photovoltaic generating station.	Medium	Negligible (between areas of proposed solar development, likely limited impacts of fence lines)	Negligible	Not Significant in EIA terms
Geophysical enclosure system anomalies (Anomaly 26a, Appendix 6-5) Trenches 532 and 605 recorded archaeological remains of potential late prehistoric /	Construction impacts related to being within areas of solar photovoltaic generating station.	Medium	None (no dig solution is proposed for AAC-B-14)	None (no dig solution is proposed for AAC-B-14)	Not Significant in EIA terms (no dig solution is proposed for AAC-B-14)

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
Romano-British date					
Geophysical enclosure system anomalies (Anomaly 28a, Appendix 6-5) Trench 645 recorded archaeological remains of potential late prehistoric / Romano-British date	Construction impacts related to being within areas of solar photovoltaic generating station.	Medium (likely prehistoric or Roman)	None (no dig solution is proposed for AAC-B-9)	None (no dig solution is proposed for AAC-B-9)	Not Significant in EIA terms (no dig solution is proposed for AAC-B-9)
Geophysical anomalies thought to potentially be archaeological (Anomaly 8a, Appendix 6-5). No trace of feature within trenches 232, 241, 242 and 248	Construction impacts related to being within areas of solar photovoltaic generating station.	None (no archaeological remains identified)	None	None	Not Significant in EIA terms
Geophysical anomalies thought to potentially be archaeological (Anomaly 8c, Appendix 6-5). No trace of feature within trench 219 but an isolated undated gully was recorded within trench 220	Construction impacts related to being within areas of solar photovoltaic generating station.	Low (isolated gully remains)	Medium	Minor	Not Significant in EIA terms

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
Geophysical anomalies thought to potentially be archaeological (Anomaly 11c, Appendix 6-5). No trace of feature within trenches 432 to 435 and 446 to 449	Construction impacts related to being within areas of solar photovoltaic generating station.	None (no archaeological remains identified)	None	None	Not Significant in EIA terms
Geophysical anomalies thought to potentially be archaeological (Anomaly 18d, Appendix 6-5). Trenches 376 to 379 recorded archaeological remains of potential late prehistoric / Romano-British date Trenches 381 and 382 to the south recorded no trace of any remains.	Construction impacts related to being within areas of solar photovoltaic generating station.	Medium	None (no dig solution is proposed for AAC-B-4)	None (no dig solution is proposed for AAC-B-4)	Not Significant in EIA terms (no dig solution is proposed for AAC-B-4)
Geophysical anomalies thought to potentially be archaeological (Anomaly 20c, Appendix 6-5). Trench 512 recorded	Construction impacts related to being within areas of solar photovoltaic generating station.	Medium	None (no dig solution is proposed for AAC-B-7)	None (no dig solution is proposed for AAC-B-7)	Not Significant in EIA terms (no dig solution is proposed for AAC-B-7)

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
archaeological remains of potential late prehistoric / Romano-British date.					
Geophysical anomalies thought to potentially be archaeological (Anomaly 21b, Appendix 6-5). Trench 563 recorded undated gully and furrow remains	Construction impacts related to being within areas of solar photovoltaic generating station.	Low (isolated gully feature)	Medium	Minor	Not Significant in EIA terms
Geophysical anomalies thought to potentially be archaeological (Anomaly 21d, Appendix 6-5). Trenches 548 and 549 recorded archaeological remains of potential late prehistoric / Romano-British date	Construction impacts related to being within areas of solar photovoltaic generating station.	Medium	None (no dig solution is proposed for AAC-B-11)	None (no dig solution is proposed for AAC-B-11)	Not Significant in EIA terms (no dig solution is proposed for AAC-B-11)
Geophysical anomalies thought to potentially be archaeological (Anomaly 26a, Appendix 6-5).	Construction impacts related to being within areas of solar photovoltaic generating station.	Medium	None (no dig solution is proposed for AAC-B-14)	None (no dig solution is proposed for AAC-B-14)	Not Significant in EIA terms (no dig solution is proposed for AAC-B-14)

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
Trenches 532 and 605 recorded archaeological remains of potential late prehistoric / Romano-British date					
Geophysical anomalies thought to potentially be archaeological (Anomaly 33a, Appendix 6-5). Trenches 523 to 529 recorded archaeological remains of potential late prehistoric / Romano-British date	No construction related impacts anticipated as asset located within area of proposed meadow	Medium	None	None	Not Significant in EIA terms
Post-medieval ditch recorded within trench 166	Construction impacts related to being within area of solar photovoltaic generating station.	Negligible	Medium	Negligible	Not Significant in EIA terms
Post-medieval ditch recorded within trench 167	Construction impacts related to being within area of solar photovoltaic generating station.	Negligible	Medium	Negligible	Not Significant in EIA terms

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
Undated ditch recorded within trench 223	Construction impacts related to being within areas of solar photovoltaic generating station	Low (isolated ditch feature)	Medium	Minor	Not Significant in EIA terms
Undated ditch recorded within trench 225	Construction impacts related to being within areas of solar photovoltaic generating station	Low (isolated ditch feature)	Medium	Minor	Not Significant in EIA terms
Undated gully and pit recorded within trench 229	Construction impacts related to being within areas of solar photovoltaic generating station	Low (isolated gully and pit feature)	Medium	Minor	Not Significant in EIA terms
Undated postholes and gullies recorded within trench 236	Construction impacts related to being within areas of solar photovoltaic generating station	Low (isolated gullies and posthole features)	Medium	Minor	Not Significant in EIA terms
Undated shallow ditches recorded within trench 243	Construction impacts related to being within areas of solar photovoltaic generating station	Low (isolated shallow ditches)	Medium	Minor	Not Significant in EIA terms
Post-medieval ditch and undated pit recorded within trench 266	Construction impacts related to being within areas of solar photovoltaic generating station	Low (isolated pit feature)	Medium	Minor	Not Significant in EIA terms

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
Undated gully within trench 268	Construction impacts related to being within areas of solar photovoltaic generating station	Low (isolated gully feature)	Medium	Minor	Not Significant in EIA terms
Post-medieval ditch recorded within trench 277	Construction impacts related to being within areas of solar photovoltaic generating station	Negligible	Medium	Negligible	Not Significant in EIA terms
Post-medieval ditch recorded within trench 279	Construction impacts related to being within areas of solar photovoltaic generating station	Negligible	Medium	Negligible	Not Significant in EIA terms
Post-medieval ditch recorded within trench 280	Construction impacts related to being within areas of solar photovoltaic generating station	Negligible	Medium	Negligible	Not Significant in EIA terms
Undated pit recorded within trench 291	Construction impacts related to being within areas of solar photovoltaic generating station	Low (isolated pit feature)	Medium	Minor	Not Significant in EIA terms
Undated pit recorded within trench 297	Construction impacts related to being within areas of solar photovoltaic generating station	Low (isolated pit feature)	Medium	Minor	Not Significant in EIA terms

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
Undated shallow ditches recorded within trench 300	Construction impacts related to being within areas of solar photovoltaic generating station	Low (shallow ditch features)	Medium	Minor	Not Significant in EIA terms
Undated pit and posthole recorded within trench 352	Construction impacts related to being within areas of solar photovoltaic generating station	Low (isolated pit and posthole features)	Medium	Minor	Not Significant in EIA terms
Post-medieval ditch recorded within trench 357	Construction impacts related to being within areas of solar photovoltaic generating station	Negligible	Medium	Negligible	Not Significant in EIA terms
Post-medieval ditch recorded within trench 358	Construction impacts related to being within areas of solar photovoltaic generating station	Negligible	Medium	Negligible	Not Significant in EIA terms
Undated shallow ditch and pits recorded within trench 359	Construction impacts related to being within areas of solar photovoltaic generating station	Low (isolated ditch and pit features)	Medium	Minor	Not Significant in EIA terms
Post-medieval ditch and undated pit recorded within trench 365	Construction impacts related to being within areas of solar photovoltaic generating station	Low (isolated pit feature)	Medium	Minor	Not Significant in EIA terms

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
Undated shallow ditch and gullies recorded within trench 368	Construction impacts related to being within areas of solar photovoltaic generating station	Low (isolated ditch and gully features)	Medium	Minor	Not Significant in EIA terms
Undated shallow ditches and pit recorded within trench 370	Construction impacts related to being within areas of solar photovoltaic generating station	Low (isolated ditch and pit features)	Medium	Minor	Not Significant in EIA terms
Undated pit recorded within trench 371	Construction impacts related to being within areas of solar photovoltaic generating station	Low (isolated pit feature)	Medium	Minor	Not Significant in EIA terms
Probable post-medieval ditch recorded within trench 383	Construction impacts related to being within areas of solar photovoltaic generating station	Negligible	Medium	Negligible	Not Significant in EIA terms
Undated shallow ditch terminus and gully recorded within trench 387	Construction impacts related to being within areas of solar photovoltaic generating station	Low (isolated ditch and gully features)	Medium	Minor	Not Significant in EIA terms
Undated pit recorded within trench 400	Construction impacts related to being within areas of solar photovoltaic generating station	Low (isolated pit feature)	Medium	Minor	Not Significant in EIA terms

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
Undated posthole recorded within trench 452	Construction impacts related to being within areas of solar photovoltaic generating station	Low (isolated posthole feature)	Medium	Minor	Not Significant in EIA terms
Undated posthole recorded within trench 453	Construction impacts related to being within areas of solar photovoltaic generating station	Low (isolated posthole feature)	Medium	Minor	Not Significant in EIA terms
Undated posthole recorded within trench 478	Construction impacts related to being within areas of solar photovoltaic generating station	Low (isolated posthole feature)	Medium	Minor	Not Significant in EIA terms
Undated gully recorded within trench 556	Construction impacts related to being within areas of solar photovoltaic generating station	Low (isolated gully feature)	Medium	Minor	Not Significant in EIA terms
Undated gully recorded within trench 621.	Construction impacts related to being within areas of solar photovoltaic generating station	Low (isolated gully feature)	Medium	Minor	Not Significant in EIA terms
Undated pit features recorded within trench 662	Construction impacts related to being within areas of solar photovoltaic generating station	Low (isolated pit features)	Medium	Minor	Not Significant in EIA terms

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
Undated pit feature recorded trench 663	Construction impacts related to being within areas of solar photovoltaic generating station	Low (isolated pit feature)	Medium	Minor	Not Significant in EIA terms
Further archaeological features identified during completion of works in sub-areas B25, B28 and B29	Construction impacts related to being within areas of solar photovoltaic generating station	To be confirmed on completion of trial trenching within this area	To be confirmed on completion of trial trenching within this area	To be confirmed on completion of trial trenching within this area	To be confirmed on completion of trial trenching within this area

6.8.15 Most of the predicted direct effects within Site B are not significant in EIA terms.

6.8.16 The completed trial trenching to date (September 2025) within Site B (with the results of sub-area B28 pending and further trenching to be undertaken within sub-areas B25 and B29) has enabled the identification of 19 AACs, all of which have directly correlated with previously identified HER assets and geophysical anomalies (see Table 6.10 above). Given the trenching results no dig solutions are proposed within 14 of these areas (AAC-B-1a, AAC-B-2a, AAC-B-3, AAC-B-4, AAC-B-5a, AAC-B-6a, AAC-B-10a, AAC-B-11, AAC-B-9, AAC-B-8, AAC-B-7AAC-B-7, AAC-B-12, AAC-B-14 and AAC-B-13), subject to consultation with BBHET as to the appropriateness of this approach in these areas. If no dig solutions can be utilised no further impacts are predicted and there would be no further direct effects upon archaeological remains within those areas.

6.8.17 Five of the areas (AAC-B-1b, AAC-B-2b, AAC-B-5b, AAC-B-6b and AAC-B-10b) are located within areas which are proposed for woodland and hedgerow enhancement, which cannot be mitigated by '*no-dig solutions'* and, therefore,

would result in moderate direct effects upon the archaeological remains within these areas. These remains include the HER recorded cropmarks of potential Iron Age and/or Romano-British enclosures / settlements (Assets 275 and 219) with associated geophysical anomalies (Anomalies 18a, 18b, 18c and 20a, **ES Vol 2 Appendix 6-5 [EN010141/DR/6.2]**), the HER recorded cropmarks of potential Iron Age and/or Romano-British enclosures / settlements (Asset 274 with associated geophysical anomalies 27a and 27b, **ES Vol 2 Appendix 6-5 [EN010141/DR/6.2]**) and geophysical enclosure system anomalies (Anomalies 7a and 31a, **ES Vol 2 Appendix 6-5 [EN010141/DR/6.2]**). These predicted moderate direct effects are significant in EIA terms.

6.8.18 It is anticipated that the final number, size and layout of the AACs noted above will be subject to change dependant on the results of ongoing investigations within Site B and following consultation with BBHET.

6.8.19 The additional mitigation recommended in relation to identified levels of effect is outlined in Section 6.9 below.

Cable Corridor - Site B to Site C

6.8.20 The proposed construction works between Sites B and C will involve the establishment of a temporary construction access corridor utilising heavy duty construction matting and an existing access track and the excavation of a cable trench (**ES Vol 3 Figure 2-5 [EN010141/DR/6.3]**).

Table 6.11: Likely Direct Effects within Site B to Site C Cable Corridor

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
HER recorded area of levelled ridge and furrow cultivation (centred Asset 678).	Construction impacts related to any groundworks required for establishment of temporary access corridor	Negligible	Low	Negligible	Not significant in EIA terms

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
Geophysical survey identified remains associated with areas of ridge and furrow and historic field boundaries.	and connecting cabling.				
Previously unrecorded heritage assets discovered during works programme.	Construction related impacts related to any groundworks required for establishment of temporary access corridor and connecting cabling.	To be confirmed on completion of any required trial trenching within this area	To be confirmed on completion of any required trial trenching within this area	To be confirmed on completion of any required trial trenching within this area	To be confirmed on completion of d any required trial trenching within this area

6.8.21 The predicted direct effects within the Site B to Site C corridor are not significant in EIA terms.

6.8.22 The assessment of predicted direct impacts within the Site B to Site C Cable Corridor will be revised on completion of any subsequent required trial trenching.

6.8.23 The additional mitigation recommended in relation to identified levels of effect is outlined in Section 6.9 below.

Site C

6.8.24 The proposed construction works within Site C would establish three separate areas of ground mounted solar photovoltaic generating station with associated inverters and transformers, security fences and access tracks (these impacts are collectively referred to in Table 6.12 below as being within areas of solar photovoltaic generating station) where construction would be facilitated by the establishment of a single temporary construction compound.

The design also includes landscaping and habitat creation within the north-eastern area, and between the areas of solar panels.

Table 6.12: Likely Direct Effects within Site C

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
The Scheduled Roman small town to south of Great Staughton (Asset 991). The scheduled area includes an area of HER recorded cropmarks of square and rectilinear enclosures in northern part of Site C (Assets 584, 629, 690, 707 & 710), a roman road (Asset 691) and a possible roman quarry (Asset 592) and geophysical survey anomalies h (Anomalies 42b, 42c, 44b, 44c, 46a, 47b, 46c, 47a, 47c and 47d, Appendix 6-5)	The scheduled area is included within Scheme as an area of meadow. As such the land use would change from arable farmland to grassland meadow (reduced impacts over time allowing for preservation in situ). A small area towards southern end of the Scheduled Area would be crossed by a buried cable (HDD method proposed) and temporary access track. Details of design mitigation measures to prevent any impacts upon Scheduled	High	None Establishment of temporary construction access road and buried cabling established by HDD (at c.10m depth) not anticipated to have any impacts.	None	Not significant in EIA terms

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
	remains are outlined in the oAMS.				
HER recorded former remains of medieval to post-medieval farm complex at Garden Farm (Asset 593), None of trenches in the area (trenches 703, 704 and 713 to 717) identified any remains related to the farm complex.	Construction impacts related to being within areas of solar photovoltaic generating station.	Negligible	None (no dig solution is proposed for AAC-C-2)	None (no dig solution is proposed for AAC-C-2)	Not Significant in EIA terms
Geophysical anomalies (Anomaly 65a and 65b). Trenches 704 and 714 recorded archaeological remains of Romano-British date while trenches 716 and 717 recorded features containing medieval and post-medieval material.	Construction impacts related to being within areas of solar photovoltaic generating station.	Medium	None (no dig solution is proposed for AAC-C-2)	None (no dig solution is proposed for AAC-C-2)	Not Significant in EIA terms (no dig solution is proposed for AAC-C-2)

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
HER recorded extent of a medieval deer park (Asset 668)	No construction related impacts anticipated as asset located within area of proposed new meadow.	Low	None	None	Not significant in EIA terms
HER and National Mapping Programme recorded former extent of ridge and furrow or associated banks (Asset 987) Only one trench (trench 695) excavated in the area recorded evidence for furrows (indicating that their survival below ground is very limited).	Construction impacts related to being within areas of solar photovoltaic generating station.	Negligible	None (no dig solution is proposed for AAC-C-1)	None (no dig solution is proposed for AAC-C-1)	Not Significant in EIA terms
HER and National Mapping Programme recorded former extent of ridge and furrow or associated banks (Asset 988) No trenches in this area (trenches 705, 706 and 708) record any trace of these remains.	Construction impacts related to being within areas of solar photovoltaic generating station.	Negligible (No trace of remains appears to survive below ground within the site)	None	None	Not significant in EIA terms

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
HER and National Mapping Programme recorded former extent of ridge and furrow or associated banks (Asset 989) No trenches in this area (trenches 709 to 711 and 722) record any trace of these remains.	Construction impacts related to being within areas of solar photovoltaic generating station.	Negligible (No trace of remains appears to survive below ground within the site)	None	None	Not significant in EIA terms
HER and National Mapping Programme recorded former extent of ridge and furrow or associated banks (Asset 990) No trenches in this area (trenches 725 and 726) record any trace of these remains.	Construction impacts related to being within areas of solar photovoltaic generating station.	Negligible (No trace of remains appears to survive below ground within the site)	None	None	Not significant in EIA terms
HER and National Mapping Programme recorded former extent of ridge and furrow or associated banks (Asset 680)	No construction related impacts anticipated as asset located within area of existing woodland that would not be developed.	Negligible	None	None	Not significant in EIA terms

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
HER and National Mapping Programme recorded former extent of ridge and furrow or associated banks (Asset 690) No trenches in this area (trenches 794 to 802) record any trace of these remains	Construction impacts related to being within areas of solar photovoltaic generating station.	Negligible (No trace of remains appears to survive below ground within the site)	None (No trace of remains appears to survive below ground within the site)	None	Not significant in EIA terms
HER and National Mapping Programme recorded former extent of ridge and furrow or associated banks (Asset 830) No trenches in this area (trenches 763 to 770) record any trace of these remains	Construction impacts related to being within areas of temporary works compound and solar photovoltaic generating station.	Negligible (No trace of remains appears to survive below ground within the site)	None	None	Not significant in EIA terms
HER and National Mapping Programme recorded former extent of ridge and furrow or associated banks (Asset 937) No trenches in area (trenches 737, 749, 815 to 817, 819 to 826, 832 and 835 to 837) record any	Construction impacts related to being within areas of solar photovoltaic generating station.	Negligible (No trace of remains appears to survive below ground within the site)	None (No trace of remains appears to survive below ground within the site)	None	Not significant in EIA terms

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
trace of these remains					
HER and National Mapping Programme recorded former extent of ridge and furrow or associated banks (Asset 943)	No construction related impacts anticipated as asset located within area of proposed meadow.	Negligible	None	None	Not significant in EIA terms
HER and National Mapping Programme recorded former extent of ridge and furrow or associated banks (Asset 944)	No construction related impacts anticipated as asset located within area of proposed meadow.	Negligible	None	None	Not significant in EIA terms
HER and cartographic record of a post-medieval farm building (Asset 184)	No construction related impacts anticipated as asset located within area of proposed meadow.	Negligible	None	None	Not significant in EIA terms
HER and cartographic record of a post-medieval farm building (Asset 185)	No construction related impacts anticipated as asset located within area of proposed meadow.	Negligible	None	None	Not significant in EIA terms

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
HER and cartographic record of a post-medieval mill (Asset 190)	No construction related impacts anticipated as asset located within area of proposed meadow.	Low	None	None	Not significant in EIA terms
HER recorded findspots within Site C (585, 589, 591, 676 & 839)	Findspots are records of recovered surface finds that cannot be impacted	N/A	None (findspots no longer present)	None	Not significant in EIA terms
Geophysical settlement anomalies (Anomaly 43a, Appendix 6-5) Trenches 821 to 823 and 830 to 832 recorded related archaeological remains of Romano-British date	Construction impacts related to being within area of solar photovoltaic generating station.	Medium	None (no dig solution is proposed for AAC-C-3)	None (no dig solution is proposed for AAC-C-3)	Not Significant in EIA terms (no dig solution is proposed for AAC-C-3)
Geophysical possible linear anomalies (Anomaly 43b, Appendix 6-5) None of trenches (trenches 750, 799, 801, 812 and 838) positioned to target anomaly identified any related features.	Construction impacts related to being within area of solar photovoltaic generating station.	None (no trace of feature identified during trenching)	None	None	Not Significant in EIA terms

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
Geophysical possible enclosure anomaly (Anomaly 43c, Appendix 6-5) Trenches 803, 804, 806, 808, 810 and 840 recorded related archaeological remains of Romano-British date	Construction impacts related to being within area of solar photovoltaic generating station.	Medium	None (no dig solution is proposed for AAC-C-4)	None (no dig solution is proposed for AAC-C-4)	Not Significant in EIA terms (no dig solution is proposed for AAC-C-4)
Geophysical possible enclosure anomaly (Anomaly 43c, Appendix 6-5) Trenches 803, 804, 806, 808, 810 and 840 recorded related archaeological remains of Romano-British date. Trench 803 contained two cremations (one within a pit, the other within a ditch fill)	Direct impacts arising from the planting of new woodland and hedgerows to provide screening for the Roman Town Scheduled Monument.	Medium	Medium Part of area included within AAC-C-5	Moderate	Significant in EIA terms
Geophysical uncertain anomaly (Anomaly 43d, Appendix 6-5) No related feature identified in most of trenches (trenches 810, 841, 846, 850, 851, 853 and 855) positioned	Construction impacts related to being within area of solar photovoltaic generating station.	Low	None (no dig solution is proposed for AAC-C-4)	None (no dig solution is proposed for AAC-C-4)	Not Significant in EIA terms

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
to target anomaly. Trenches 803 and 810 identified a north to south aligned ditch which appears to correlate to a track visible on late 19th century mapping.					
Geophysical settlement anomaly (Anomalies 66a and 66b, Appendix 6-5) Trenches 687, 689, 690 and 693 to 699 recorded related archaeological remains of Romano-British date	Construction impacts related to being within area solar photovoltaic generating station.	Medium	None (no dig solution is proposed for AAC-C-1)	None (no dig solution is proposed for AAC-C-1)	Not Significant in EIA terms (no dig solution is proposed for AAC-C-1)
Roman pit and Roman/medieval ditch identified within trench 702	Construction impacts related to being within area solar photovoltaic generating station	Medium	None (no dig solution is proposed for AAC-C-1)	None (no dig solution is proposed for AAC-C-1)	Not Significant in EIA terms (no dig solution is proposed for AAC-C-1)

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
Roman pit and ditch terminus, medieval pit and post-medieval ditch identified within trench 682	Construction impacts related to being within area solar photovoltaic generating station	Medium	None (no dig solution is proposed for AAC-C-1)	None (no dig solution is proposed for AAC-C-1)	Not Significant in EIA terms (no dig solution is proposed for AAC-C-1)
Isolated pits (one dated to Romano-British Period) identified within trench 683	Construction impacts related to being within area solar photovoltaic generating station	Low	None (Isolated pits do not extend beyond trench 683 and, therefore, have been preserved by record)	None	Not Significant in EIA terms
Shallow irregular feature (Roman in date) and gully (undated) identified within trench 757	Construction impacts related to being within area solar photovoltaic generating station	Low	Medium	Minor	Not Significant in EIA terms
Undated Posthole identified in trench 760	Construction impacts related to being within area solar photovoltaic generating station	Negligible	None (Isolated posthole does not extend beyond trench 760 and, therefore, has been preserved by record)	None	Not Significant in EIA terms

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
Ridge and Furrow remains identified within trench 761	Construction impacts related to being within area solar photovoltaic generating station	Negligible	Medium	Negligible	Not Significant in EIA terms
Undated pit and ditch (contained post-medieval and Roman material, though appears to be aligned with mapped historic 19th C boundary) identified within trench 705	Construction impacts related to being within area solar photovoltaic generating station	Low	Medium	Minor	Not Significant in EIA terms
Isolated Roman pit identified within trench 707	Construction impacts related to being within area solar photovoltaic generating station	Low	None (Isolated pit does not extend beyond trench 707 and, therefore, has been preserved by record)	None	Not Significant in EIA terms
Post-medieval to modern ditch identified within trench 711 (aligned with mapped historic 19th C boundary)	Construction impacts related to being within area solar photovoltaic generating station	Negligible	Medium	Negligible	Not Significant in EIA terms
Undated ditch identified within trench 720	Construction impacts related to being within area solar photovoltaic generating station	Negligible (features of greater importance in the area have generally contained finds material)	Medium	Negligible	Not Significant in EIA terms

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
Undated postholes and pit identified within trench 767 (possibly structural in close proximity to Roman Town)	No construction related impacts anticipated as asset located within area of proposed meadow	Medium	None	None	Not Significant in EIA terms
Undated pit, post hole and ditch identified in trench 769 (near Roman Town scheduled monument, ditch does not correlate to historical mapping)	No construction related impacts anticipated as asset located within area of proposed meadow	Medium	None	None	Not Significant in EIA terms
Post-medieval to modern ditch identified within trench 776 (aligned with mapped historic 19th C boundary)	Construction impacts related to being within area solar photovoltaic generating station	Negligible	Medium	Negligible	Not Significant in EIA terms
Undated ditch identified within trench 779 (aligned with mapped historic 19th C trackway)	Construction impacts related to being within area solar photovoltaic generating station	Negligible	Medium	Negligible	Not Significant in EIA terms
Undated gullies identified within trench 730	Construction impacts related to being within area solar photovoltaic generating station	Negligible (features of greater importance in the area have generally contained finds material)	Medium	Negligible	Not Significant in EIA terms

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
Post-medieval ditch identified within trench 731 (aligned with mapped historic 19th C boundary)	Construction impacts related to being within area solar photovoltaic generating station	Negligible	Medium	Negligible	Not Significant in EIA terms
Undated ditch identified within trench 747 (aligned with mapped historic 19th C boundary)	Construction impacts related to being within area solar photovoltaic generating station	Negligible	Medium	Negligible	Not Significant in EIA terms
Post-medieval ditch identified within trench 792 (aligned with mapped historic 19th C boundary)	Construction impacts related to being within area solar photovoltaic generating station	Negligible	Medium	Negligible	Not Significant in EIA terms
Undated ditch identified within trench 794 (aligned with mapped historic 19th C boundary)	Construction impacts related to being within area solar photovoltaic generating station	Negligible	Medium	Negligible	Not Significant in EIA terms
Medieval to post-medieval occupational layer identified within trench 819	Construction impacts related to being within area solar photovoltaic generating station	Low	Medium	Minor	Not Significant in EIA terms
Roman ditch and undated pit identified within trench 736	Construction impacts related to being within area solar photovoltaic generating station	Medium	None (no dig solution is proposed for AAC-C-3)	None (no dig solution is proposed for AAC-C-3)	Not Significant in EIA terms (no dig solution is proposed for AAC-C-3)

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
Undated gully identified within trench 754	Construction impacts related to being within area solar photovoltaic generating station	Negligible (features of greater importance in the area have generally contained finds material)	Medium	Negligible	Not Significant in EIA terms
Roman ditch and pit identified within trench 797	Construction impacts related to being within area solar photovoltaic generating station	Medium	None (no dig solution is proposed for AAC-C-4)	None (no dig solution is proposed for AAC-C-4)	Not Significant in EIA terms (no dig solution is proposed for AAC-C-4)
Post-medieval brick wall on foundation of possible reused Roman masonry identified within trench 798	Construction impacts related to being within area solar photovoltaic generating station	Negligible (though any Roman remains in area would likely be Medium)	None (no dig solution is proposed for AAC-C-4)	None (no dig solution is proposed for AAC-C-4)	Not Significant in EIA terms (no dig solution is proposed for AAC-C-4)

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
Shallow undated gully identified within trench 801	Construction impacts related to being within area solar photovoltaic generating station	Negligible (features of greater importance in the area have generally contained finds material)	None (no dig solution is proposed for AAC-C-4)	None (no dig solution is proposed for AAC-C-4)	Not Significant in EIA terms (no dig solution is proposed for AAC-C-4)
Undated pit and ditch identified within trench 802	Construction impacts related to being within area solar photovoltaic generating station	Negligible (features of greater importance in the area have generally contained finds material)	None (no dig solution is proposed for AAC-C-4)	None (no dig solution is proposed for AAC-C-4)	Not Significant in EIA terms (no dig solution is proposed for AAC-C-4)
Undated pit and ditch identified within trench 802	Direct impacts arising from the planting of new woodland and hedgerows to provide screening for the Roman Town scheduled monument.	Negligible (features of greater importance in the area have generally contained finds material)	Medium Part of area included within AAC-C-5	Moderate	Significant in EIA terms
Undated pit identified within trench 814	Construction impacts related to being within area solar photovoltaic generating station	Negligible (features of greater importance in the area have generally contained finds material)	Medium	Negligible	Not Significant in EIA terms
Undated shallow pits identified within trench 839	Construction impacts related to being within area solar photovoltaic generating station	Negligible (features of greater importance in the area have generally	Medium	Negligible	Not Significant in EIA terms

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
		contained finds material)			
Undated pit identified within trench 847	Construction impacts related to being within area solar photovoltaic generating station	Negligible (features of greater importance in the area have generally contained finds material)	Medium	Negligible	Not Significant in EIA terms
Undated pits identified within trench 843	Construction impacts related to being within area solar photovoltaic generating station	Negligible (features of greater importance in the area have generally contained finds material)	Medium	Negligible	Not Significant in EIA terms

6.8.25 Most of the predicted direct effects within Site C are not significant in EIA terms.

6.8.26 The completed trial trenching to date (September 2025) within Site C has enabled the identification of five AACs, all of which have directly correlated with previously identified HER assets and geophysical anomalies (see Table 6.12 above). Given the results of the trenching no dig solutions are proposed within four of these areas (AAC-C-1, AAC-C-2, AAC-C-3 and AAC-C-4), subject to consultation with CHET and HE as to the appropriateness of this approach in these areas. If no dig solutions can be utilised no further impacts are predicted and there would be no further direct effects upon archaeological remains within those areas.

6.8.27 One of the areas (AAC-C-5) is located within an area which is proposed for woodland and hedgerow enhancement, which cannot be mitigated by '*no-dig solutions'* and, therefore, would result in moderate direct effects upon the archaeological remains within this area. These remains include the geophysical possible enclosure anomaly (Anomaly 43c, **ES Vol 2 Appendix 6-5 [EN010141/DR/6.2]**). These predicted moderate direct effects are significant in EIA terms.

6.8.28 It is anticipated that the final number, size and layout of the AACs noted above will be subject to change dependant on the results of ongoing investigations within Site C and following consultation with BBHET.

6.8.29 The additional mitigation recommended in relation to identified levels of effect is outlined in Section 6.9 below.

Site C to Site D – Cable Corridor

6.8.30 The proposed construction works between Sites C and D would involve the establishment of a temporary construction access corridor utilising Heavy Duty Construction Matting and the installation of buried cabling along the length of the Site C to Site D corridor (**ES Vol 3 Figure 2-6 [EN010141/DR/6.3]**).

Table 6.13: Likely Direct Effects within Site C to Site D Cable Corridor

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
HER recorded area of levelled ridge and furrow cultivation (centred Asset 679). Also visible in geophysical survey data of the area.	Construction impacts related to any groundworks required for establishment of temporary access corridor and connecting cabling.	Negligible	Low	Negligible	Not significant in EIA terms

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
Possible trackway anomaly (anomaly 105a)	Construction impacts related to any groundworks required for establishment of temporary access corridor and connecting cabling.	Medium (potentially associated with moated site to the north, to be confirmed via trenching)	Low	Minor	Not significant in EIA terms
Unclear linear anomaly (Anomaly 105b)	Construction impacts related to any groundworks required for establishment of temporary access corridor and connecting cabling.	Low (likely associated with agricultural activity, to be confirmed via trenching)	Low	Negligible	Not significant in EIA terms
Further archaeological features identified during any required trial trenching of this area	Construction impacts related to any groundworks required for establishment of temporary access corridor and connecting cabling.	To be confirmed completion of any required trial trenching within this area	To be confirmed completion of any required trial trenching within this area	To be confirmed completion of any required trial trenching within this area	To be confirmed completion of any required trial trenching within this area

6.8.31 The predicted direct effects upon known heritage assets within the Site C to Site D corridor are not significant in EIA terms.

6.8.32 The assessment of predicted direct impacts within the Site C to Site D Cable Corridor will be revised on completion of any subsequent required trial trenching.

6.8.33 The additional mitigation recommended in relation to identified levels of effect is outlined in Section 6.9 below.

Site D

6.8.34 The proposed construction works within Site D would establish three separate areas of ground mounted solar photovoltaic generating station with

associated inverters and transformers, security fences and access tracks (these impacts are collectively referred to in Table 6.14 below as being within areas of solar photovoltaic generating station) where construction would be facilitated by the establishment of a solitary temporary construction compound. The design also includes landscaping and habitat creation between and around the solar panel areas. The East Park BESS and East Park Substation would be constructed within the west of Site D along with a drainage basin to its east and the storage, operations and maintenance building to its south.

Table 6.14: Likely Direct Effects within Site D

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
HER recorded enclosure cropmarks (Asset 644) and geophysical anomalies (Anomalies 48a, 49a, 49b, Appendix 6-5) Trial trenching (trenches 919, 922, 924, 925, 927, 930, 932, 935, 936, 938, 940 to 952 and 956 to 957) has identified remains that are potentially associated with prehistoric to Roman enclosure activity.	Construction related impacts related to being within area of solar photovoltaic generating station	Medium (likely prehistoric or Roman)	None (no dig solution is proposed for AAC-D-2, AAC-D-3a and AAC-D-4a)	None (no dig solution is proposed for AAC-D-2, AAC-D-3a and AAC-D-4a)	Not Significant in EIA terms (no dig solution is proposed for AAC-D-2, AAC-D-3a and AAC-D-4a)
HER recorded enclosure cropmarks (Asset 644) and geophysical anomalies	Direct impacts arising from the planting of new woodland and	Medium (likely prehistoric or Roman	Medium Part of area included within AAC-D-3b and AAC-D-4b	Moderate	Significant in EIA terms

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
(Anomalies 48a, 49a, 49b, Appendix 6-5) Trial trenching (trenches 919, 922, 924, 925, 927, 930, 932, 935, 936, 938, 940 to 952 and 956 to 957) has identified remains that are potentially associated with prehistoric to Roman enclosure activity.	hedgerows to provide screening.				
HER recorded possible moated site (Asset 407)	No construction related impacts anticipated as asset located within area of existing green infrastructure which will be retained.	Medium	None	None	Not significant in EIA terms
HER recorded extent of a post-medieval quarry (Asset 674) and geophysical anomalies (Anomaly 48d, Appendix 6-5) A potentially associated pit feature was recorded within trench 902	Construction impacts related to being within area of solar photovoltaic generating station.	Negligible	Medium	Negligible	Not significant in EIA terms

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
HER recorded extent of a post-medieval quarry (Asset 674) and geophysical anomalies (Anomaly 48d, Appendix 6-5) A potentially associated pit feature was recorded within trench 902.	Direct impacts arising from the planting of new woodland and hedgerows to provide screening.	Negligible	Medium	Negligible	Not significant in EIA terms
HER and National Mapping Project recorded a bank, wall or path (Asset 938) No related archaeological remains were identified within any of the trenches	Construction impacts related to being within area of BESS and substation	Negligible	None (does not appear to survive as a below ground feature)	Negligible	Not significant in EIA terms
HER and National Mapping Project recorded an area of ridge and furrow (Asset 773) Trial trenching yet to be completed within this area (sub-area D02)	Construction impacts related to being within area of solar photovoltaic generating station.	Negligible	Medium	Negligible	Not significant in EIA terms
Rectilinear, curvilinear, linear and circular shaped	Construction impacts related to being within	Medium (likely prehistoric or Roman)	None (no dig solution is proposed for AAC-D-5)	None (no dig solution is proposed for AAC-D-5)	Not Significant in EIA terms (no dig

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
anomalies (anomaly 48a) Trial trenching (trenches 902, 904 to 906) has identified remains that are potentially associated with prehistoric to Roman enclosure activity.	area of solar photovoltaic generating station.				solution is proposed for AAC-D-5)
Rectilinear, curvilinear, linear and circular shaped anomalies (anomaly 48a) Trial trenching (trenches 902, 904 to 906) has identified remains that are potentially associated with prehistoric to Roman enclosure activity.	Direct impacts arising from the planting of new woodland and hedgerows to provide screening.	Medium (likely prehistoric or Roman	Medium Part of area included within AAC-D-4b	Moderate	Significant in EIA terms
Geophysical survey possible anomalies in northwest of Area 52 Possible prehistoric or Roman remains recorded in trench 874	Construction impacts related to being within area of solar photovoltaic generating station.	Medium (likely prehistoric or Roman	None (no dig solution is proposed for AAC-D-1)	None (no dig solution is proposed for AAC-D-1)	Not Significant in EIA terms (no dig solution is proposed for AAC-D-1)
Geophysical survey possible anomalies in north of Area 52	Construction impacts related to being within area of solar	Low (likely post-medieval, to be confirmed)	Medium	Minor	Not Significant in EIA terms

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
Undated field boundary and associated remains recorded in trench 861	photovoltaic generating station.				
Geophysical survey unclear (anomaly 51a) Trial trenching yet to be completed within this area (sub-area D02)	Construction impacts related to being within area of solar photovoltaic generating station.	Low (to be confirmed by trial trenching)	Medium	Minor	Not significant in EIA terms
Undated ditch recorded within trench 872	Construction impacts related to being within area of solar photovoltaic generating station.	Low (isolated ditch feature)	Medium	Minor	Not significant in EIA terms
Undated ditch recorded within trench 910	Construction impacts related to being within area of solar photovoltaic generating station.	Low (isolated ditch feature)	Medium	Minor	Not significant in EIA terms
Undated ditch recorded within trench 913	Construction impacts related to being within area of solar photovoltaic generating station.	Low (isolated ditch feature)	Medium	Minor	Not significant in EIA terms
Undated pit recorded within trench 964	Construction impacts related to being within area of solar	Low (isolated pit feature)	Medium	Minor	Not significant in EIA terms

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
	photovoltaic generating station.				
Undated pit recorded within trench 965	Construction impacts related to being within area of solar photovoltaic generating station.	Low (isolated pit feature)	Medium	Minor	Not significant in EIA terms
Modern gully recorded within trench 966	Construction impacts related to being within area of solar photovoltaic generating station.	Negligible	Medium	Negligible	Not significant in EIA terms
Undated gully recorded within trench 967	Construction impacts related to being within area of solar photovoltaic generating station.	Low (isolated gully feature)	Medium	Minor	Not significant in EIA terms
Post-medieval boundary ditch recorded within trench 968	Construction impacts related to being within area of solar photovoltaic generating station.	Negligible	Medium	Negligible	Not significant in EIA terms
Undated ditches, gully and a pit recorded within trench 969	Construction impacts related to being within area of solar photovoltaic generating station.	Low (isolated features)	Medium	Minor	Not significant in EIA terms

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
An undated gully and a pit were recorded within trench 970	Construction impacts related to being within area of solar photovoltaic generating station.	Low (isolated features)	Medium	Minor	Not significant in EIA terms
An undated post hole was recorded within trench 971	Construction impacts related to being within area of solar photovoltaic generating station.	Low (isolated features)	Medium	Minor	Not significant in EIA terms
Four currently undated linear features were recorded within trench 972	Construction impacts related to being within area of solar photovoltaic generating station.	Low (isolated features)	Medium	Minor	Not significant in EIA terms
An undated post hole was recorded within trench 978	Construction impacts related to being within area of solar photovoltaic generating station.	Low (isolated features)	Medium	Minor	Not significant in EIA terms
Trial trench excavation within sub-are D02 may reveal further archaeological remains	Construction impacts related to being within area of solar photovoltaic generating station.	To be confirmed on completion of trial trenching in the area	To be confirmed on completion of trial trenching in the area	To be confirmed on completion of trial trenching in the area	To be confirmed on completion of trial trenching in the area

6.8.35 Most of the predicted direct effects within Site D are not significant in EIA terms or are unknown, pending further investigative work within sub-area D02.

6.8.36 The completed trial trenching to date (September 2025) within Site D has enabled the identification of seven AACs, all of which have directly correlated with previously identified HER assets and geophysical anomalies (see Table 6.13 above). Given the trenching results no dig solutions are proposed within five of these areas (AAC-D-1, AAC-D-2, AAC-D-3a, AAC-D-4a and AAC-D-5), subject to consultation with CHET as to the appropriateness of this approach in these areas. If no dig solutions can be utilised no further impacts are predicted and there would be no further direct effects upon archaeological remains within those areas.

6.8.37 Two of the areas (AAC-D-3b and AAC-D-4b) are located within areas which are proposed for woodland and hedgerow enhancement, which cannot be mitigated by *'no-dig solutions'* and, therefore, would result in moderate direct effects upon the archaeological remains within this area. These remains include the HER recorded enclosure cropmarks (Asset 644) and geophysical anomalies (Anomalies 48a, 49a, 49b, **ES Vol 2 Appendix 6-5 [EN010141/DR/6.2]).** These predicted moderate direct effects are significant in EIA terms.

6.8.38 It is anticipated that the final number, size and layout of the AACs noted above will be subject to change dependant on the results of ongoing investigations within Site D (sub-area D02) and following consultation with CHET.

6.8.39 The additional mitigation recommended in relation to identified levels of effect is outlined in Section 6.9 below.

Grid Connection

6.8.40 The proposed construction works along the grid connection would involve the establishment of a temporary construction access utilising heavy duty

construction matting between Site D and the Eaton Socon Substation and the laying of the extra high voltage (EHV) cable in a single circuit in a trench up to 1.5m wide and up to 2m deep along with its associated cable jointing chambers. Most of the route would be lain via open trench, though horizontal directional drilling may be used in identified areas of Areas of Archaeological Constraint identified post-determination. The works within the Eaton Socon Substation would be relatively minor, consisting of the creation of a new 400 kV generation bay including circuit breaker and associated switchgear equipment, and within the footprint of the existing substation area.

Table 6.15: Likely Direct Effects along the Grid Connection

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
HER recorded route of a Roman Road between Cambridge and Bolnhurst (Asset 408/706) and later known as Green Lane (Asset 418)	Construction impacts related to any groundworks required for establishment of temporary access corridor and EHV cable and associated cable jointing chambers.	Medium	Low (roads are linear features extending well beyond construction footprint)	Minor	Not significant in EIA terms
HER and National Mapping Programme recorded late prehistoric/Roman settlement cropmarks (Asset 241) to west of connection route. Fragmentary linear trends have been identified within the geophysical survey in this area (anomaly 113a)	Construction impacts related to any groundworks required for establishment of temporary access corridor and EHV cable and associated cable jointing chambers	Medium	Low (settlement area extends well beyond construction footprint)	Minor	Not significant in EIA terms
HER and National Mapping Programme recorded late	Construction impacts related to any groundworks	Medium	Low (settlement area	Minor	Not significant in EIA terms

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
prehistoric/Roman settlement cropmarks (Asset 244)	required for establishment of temporary access corridor and EHV cable and associated cable jointing chambers		extends well beyond construction footprint)		
HER and National Mapping Programme recorded late prehistoric/Roman settlement cropmarks (Asset 245) Unclear partial circle anomaly has been identified within the geophysical survey in this area (anomaly 115b)	Construction related impacts related to any groundworks required for establishment of temporary access corridor and EHV cable and associated cable jointing chambers	Medium	Low (settlement area extends well beyond construction footprint)	Minor	Not significant in EIA terms
HER and National Mapping Programme recorded late prehistoric/Roman settlement cropmarks (Asset 246)	Construction impacts related to any groundworks required for establishment of temporary access corridor and EHV cable and associated cable jointing chambers	Medium	Low (settlement area extends well beyond construction footprint)	Minor	Not significant in EIA terms
HER and National Mapping Programme recorded late prehistoric/Roman settlement cropmarks (Asset 247) Well-defined, circular anomaly been identified within the	Construction impacts related to any groundworks required for establishment of temporary access corridor and EHV cable and associated cable jointing chambers	Medium	Low (settlement area extends well beyond construction footprint)	Minor	Not significant in EIA terms

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
geophysical survey in this area (anomaly 115a) Several possible enclosure anomalies have been identified within the geophysical survey to the north of this area (anomaly 114a)					
HER and National Mapping Programme recorded late prehistoric/Roman settlement cropmarks (Asset 787) Several possible enclosure anomalies have been identified within the geophysical survey in this area (anomaly 109a)	Construction impacts related to any groundworks required for establishment of temporary access corridor and EHV cable and associated cable jointing chambers	Medium	Low (settlement area extends well beyond construction footprint)	Minor	Not significant in EIA terms
HER and National Mapping Programme recorded late prehistoric/Roman settlement cropmarks (Asset 835)	Construction impacts related to any groundworks required for establishment of temporary access corridor and EHV cable and associated cable jointing chambers	Medium	Low (settlement area extends well beyond construction footprint)	Minor	Not significant in EIA terms
HER recorded areas of ridge and furrow (Asset 778)	Construction impacts related to any groundworks required for	Negligible	Low (ridge and furrow area extends well	Negligible	Not significant in EIA terms

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
Geophysical survey has identified related anomalies in this area	establishment of temporary access corridor and EHV cable and associated cable jointing chambers		beyond construction footprint)		
HER recorded areas of ridge and furrow (Asset 785) Geophysical survey has identified related anomalies in this area	Construction impacts related to any groundworks required for establishment of temporary access corridor and EHV cable and associated cable jointing chambers	Negligible	Low (ridge and furrow area extends well beyond construction footprint)	Negligible	Not significant in EIA terms
HER and National Mapping Programme recorded areas of ridge and furrow (Asset 832) Geophysical survey has identified related anomalies in this area	Construction impacts related to any groundworks required for establishment of temporary access corridor and EHV cable and associated cable jointing chambers	Negligible	Low (ridge and furrow area extends well beyond construction footprint)	Negligible	Not significant in EIA terms
HER and National Mapping Programme recorded areas of ridge and furrow (Asset 833) Geophysical survey has identified related anomalies in this area	Construction related impacts related to any groundworks required for establishment of temporary access corridor and EHV cable and associated cable jointing chambers	Negligible	Low (ridge and furrow area extends well beyond construction footprint)	Negligible	Not significant in EIA terms
HER and National Mapping Programme recorded areas of ridge and furrow (Asset 834)	Construction impacts related to any groundworks required for establishment	Negligible	Negligible (most of the ridge and furrow area extends well	Negligible	Not significant in EIA terms

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
Geophysical survey has identified related anomalies in this area	of temporary access corridor and EHV cable and associated cable jointing chambers		beyond construction footprint)		
HER and National Mapping Programme recorded areas of ridge and furrow (Asset 836) Geophysical survey has identified related anomalies in this area	Construction impacts related to any groundworks required for establishment of temporary access corridor and EHV cable and associated cable jointing chambers	Negligible	Low (ridge and furrow area extends well beyond construction footprint)	Negligible	Not significant in EIA terms
HER and National Mapping Programme recorded areas of ridge and furrow (Asset 837) Several possible enclosure anomalies have been identified within the geophysical survey in this area (anomaly 114a)	Construction impacts related to any groundworks required for establishment of temporary access corridor and EHV cable and associated cable jointing chambers	Negligible	Low (ridge and furrow area extends well beyond construction footprint)	Negligible	Not significant in EIA terms
HER and National Mapping Programme recorded areas of ridge and furrow (Asset 838) Geophysical survey has identified related anomalies in this area	Construction impacts related to any groundworks required for establishment of temporary access corridor and EHV cable and associated cable jointing chambers	Negligible	Low (ridge and furrow area extends well beyond construction footprint)	Negligible	Not significant in EIA terms
HER and National Mapping Programme	Construction impacts related to any	Negligible	Low	Negligible	Not significant in EIA terms

Heritage Asset / Geophysical Anomaly	Description of Impact	Importance of Asset	Predicted Magnitude of Impact	Predicted Significance of Effect	Significance in EIA terms
recorded areas of ridge and furrow (Asset 839) Fragmentary linear trends have been identified within the geophysical survey in this area (anomaly 113a)	groundworks required for establishment of temporary access corridor and EHV cable and associated cable jointing chambers		(ridge and furrow area extends well beyond construction footprint)		
HER and National Mapping Programme recorded areas of ridge and furrow (Asset 840) Geophysical survey has identified related anomalies in this area	Construction impacts related to any groundworks required for establishment of temporary access corridor and EHV cable and associated cable jointing chambers	Negligible	Low (ridge and furrow area extends well beyond construction footprint)	Negligible	Not significant in EIA terms
HER and National Mapping Programme recorded areas of ridge and furrow (Asset 841) Geophysical survey has identified related anomalies in this area	Construction impacts related to any groundworks required for establishment of temporary access corridor and EHV cable and associated cable jointing chambers	Negligible	Low (ridge and furrow area extends well beyond construction footprint)	Negligible	Not significant in EIA terms
Further archaeological features identified during any required trial trenching of this area	Construction impacts related to any groundworks required for establishment of temporary access corridor and EHV cable and associated cable jointing chambers	To be confirmed completion of any required trial trenching within this area	To be confirmed completion of any required trial trenching within this area	To be confirmed completion of any required trial trenching within this area	To be confirmed completion of any required trial trenching within this area

6.8.41 All of the predicted direct effects on known heritage assets within the grid connection corridor are not significant in EIA terms.

6.8.42 The assessment of predicted direct impacts within the grid connection corridor will be revised on completion of any subsequent required trial trenching.

6.8.43 The additional mitigation recommended in relation to identified levels of effect is outlined in Section 6.9 below.

Indirect Effects

6.8.44 There are also potential indirect effects as a result of the construction works upon the historic environment. These include changes in drainage patterns or compression of the ground from infrastructure, changes to local groundwater that could potentially affect any waterlogged organic archaeological and palaeoenvironmental remains (if present) and the potential increase in overland flow of water which has the potential to increase scour in the watercourses.

6.8.45 The potential for compression arising from the Scheme has been considered. The results of the completed trial trench evaluation across the Scheme have established that that archaeological remains are typically encountered at a depth of between 200mm and 400m bgl (with localised variation) and all of the remains encountered are negative cut features (ditches, pits, gullies) of dates ranging from the late prehistoric and Roman periods though to the post-medieval and modern periods.

6.8.46 Outside the AACs identified within the sections above the potential for compression would be related to the piling for the areas of ground mounted solar photovoltaic generating station and foundations for the solar inverters, transformers, security fences and three temporary construction compounds as well as associated permanent and temporary access tracks. In these areas the construction will be facilitated by the strip excavation of foundations (or localised piling) which would result in localised direct impacts upon any archaeological remains within their extent. As such, and given the types of

remains identified, it is not anticipated that the potential or severity of any indirect compression impacts exceeds the potential or severity of direct physical impacts arising from their construction (as detailed in the sections above).

6.8.47 Within the identified AACs the potential for indirect compression impacts, were no dig solutions to be utilised (appropriateness of approach to be confirmed by liaison with HE, BBHET and CHET) is limited to the effects of the non-intrusive surface mounted concrete ground anchors (sleepers) as illustrated on **ES Vol 3 Figure 2-2a: Indicative Solar PV Table, Mounting Structure and String Inverters [EN010141/DR/6.3]** and the potential for compaction effects arising from the development of permanent and temporary access tracks. The construction access roads and permanent access roads have been designed to reduce the potential for compression, with details of these elements provided in Section 7.3 of the **oAMS [EN010141/DR/7.15]**. The utilisation of these construction methods should ensure that there will be no (or extremely limited) indirect compression impacts within the AACs.

6.8.48 Liaison with the hydrology team indicates that as there are no significant excavations or underground obstructions that could affect groundwater movement, it is not anticipated that there would be any significant impacts on groundwater. The **outline Surface Water Management Plan [EN010141/DR/7.13]** would mitigate against any potential increase in run-off and so it is also not anticipated that there would be any increase in scour that could affect archaeology. On this basis no significant indirect physical effects in relation to groundwater or surface scour are anticipated with further details relating to the proposed water management also included within Section 7.3 of the **oAMS [EN010141/DR/7.15]**.

6.8.49 The potential for indirect effects (both relating to compression and hydrological changes) upon the Roman small town south of Great Staughton Scheduled Monument (Asset 991) have been considered in relation to the required temporary access route that will cross part of the scheduled area. The proposed approach (to be confirmed by consultation with HE and CHET,

as detailed within Section 7.3 of the **oAMS [EN010141/DR/7.15]**) will be formed by laying a tough, 6m wide permeable geotextile mat along the preferred alignment. On top of this, a shallow geogrid will be laid in which type 1 aggregate will be placed to a depth of up to 150mm to form a temporary sub-base. The purpose of the geogrid is to provide increased stability and weight distribution to avoid compaction of the soils beneath. Finally, interlocking heavy duty plastic matting (e.g. IsoTrack H) will be set out on the temporary sub-base to form a continuous road like surface 5m wide. Whilst this heavy-duty plastic matting does not require the geogrid and aggregate sub-base to be effective (even on soft ground), the Applicant is proposing these measures to ensure minimum potential compaction or harm to the underlying archaeology. As the proposed heavy duty plastic mats have an impermeable surface there is potential for increased run-off either side of the track. The Applicant is proposing to provide drains within the temporary sub-base to convey water to nearby ditches, thereby avoiding increased run-off, waterlogging, or erosion of archaeology either side of the temporary access track. The utilisation of these construction methods should ensure that there will be no (or extremely limited) indirect impacts within the scheduled area (and much reduced in comparison to the current arable use of the area).

6.8.50 The trial trench evaluation programme that has been undertaken within the Scheme included an environmental sampling strategy to allow for the potential recovery of any waterlogged organic archaeological and palaeoenvironmental remains. Future sampling strategies will include the aims and objectives of the work, considering the nature, range and significance of biological remains present (with reference to the results of the completed evaluation trenching) and requirements for any specific specialist assessment.

Temporary Effects upon Setting

6.8.51 There is also potential for temporary effects upon the setting of designated heritage assets in the vicinity of the Site during the construction phase in the form of increased traffic, noise and visual impacts. Full consideration of the

potential for these impacts is set out in **ES Vol 2 Appendix 6-4 [EN010141/DR/6.2]**, with the results of the assessment summarised below.

No or Neutral Effects

6.8.52 For most of the heritage assets assessed for this chapter no or neutral effects have been identified upon their settings during the construction phase. With regard to the neutral effects it is acknowledged that the construction works may introduce a temporary change (via traffic, visual or noise impact) that although noticeable would not materially affect any elements of these assets setting which are considered to be making a contribution to their cultural value (see **ES Vol 2 Appendix 6-4 [EN010141/DR/6.2]**).

6.8.53 These levels of effect are not significant in EIA terms and will not result in harm. There is, therefore, no mitigation recommended in relation to these temporary levels of effect.

Minor Effects

6.8.54 This assessment has predicted temporary minor adverse effects upon the settings of the following heritage assets during the construction phase (introduced via traffic, visual or noise impacts associated with construction works and access):

- The non-designated moated site (Asset 311) and windmill mound (Asset 328) which would be temporarily impacted by construction works within Site A;
- Grade I listed Church of St Peter (Asset 48), and the grade II listed Chadwell Farmhouse (Asset 129) and Hall Farmhouse (Asset 149) in Pertenhall, in relation to construction works within Sites A and B;
- Heritage assets within Great Staughton including the Great Staughton Conservation Area (Asset 164); the grade I listed Church of St Andrew (Asset 534), the grade II* listed Place House (Asset 805); the grade II listed The Manor (Asset 526) and its associated gatepiers (Listing Number

1214656) and non-designated park (Asset 648) in relation to construction works within Site C;

- The scheduled monuments of Rushey Farm (Asset 2), and two bowl barrows (Asset 13) in relation to construction works within Site C;
- Heritage assets within Little Staughton including the grade II listed Green End Cottage (Asset 40), Tudor Rose Cottage (Asset 134), Green End House (Asset 148) and The Cottage (Asset 41), within Wood End, predominantly in relation to construction works within Site B;
- Heritage assets within Keysoe including the grade I listed Church of St Mary the Virgin (Asset 19), the grade II listed The Manor (Asset 136), Keysoe War Memorial (Asset 24), barn to rear of The Manor (Asset 28), Cottage to north of Lavender Cottage (Asset 154), Lavender Cottage (Asset 27) and the locally listed Last Straw Cottage (Asset 28); and
- The grade I listed Church of St Nicholas (Asset 755) in Swineshead.

6.8.55 These levels of effect are not significant in EIA terms. They would, however, cause temporary *'less than substantial'* harm to the heritage assets listed above. This temporary *'less than substantial harm'* would last until the completion of the construction works, at which point the assessments of the operational levels of effect and harm are applicable. In addition to being temporary any less than substantial harm is considered to be at the lower end of the scale. There is, therefore, no additional mitigation recommended in relation to these temporary minor levels of effect.

Moderate Effects

6.8.56 This assessment has predicted temporary moderate adverse effects upon the settings of the following heritage assets during the Construction Phase (introduced via traffic, visual or noise impacts associated with construction works and access):

- The Old Manor House, Cretingsbury: a motte castle and moated manor house (Asset 4) and the grade I listed Church of All Saints (Asset 38) in

relation to construction works within the eastern part of Site B and, most principally, within the cable corridor between Sites B and C;

- The Roman small town south of Great Staughton Scheduled Monument (Asset 991) within the northern part of Site C; and
- The possible moated site (Asset 407) within the north-western part of Site D.

6.8.57 These levels of temporary effect are significant in EIA terms. It is assessed that they would cause temporary *'less than substantial'* harm to the heritage assets listed above. In addition to being temporary any *'less than substantial'* harm is considered to be at the low to mid end of the scale. The temporary moderate adverse effects and *'less than substantial harm'* would last until the completion of the construction works, at which point the assessments of the operational levels of effect and harm are applicable. There is, therefore, no additional mitigation recommended in relation to these temporary moderate levels of effect.

Operational Phase

6.8.58 The potential for operational phase effects upon the setting of heritage assets is predominantly related to the potential visual impact of the completed Scheme. Although it is acknowledged that there may also be noise and traffic (for maintenance, replacements etc.) impacts during the operational phase these are not considered to have the potential to exceed the levels assessed for the visual impacts.

6.8.59 Full consideration of the potential for these impacts is set out in **ES Vol 2 Appendix 6-4 [EN010141/DR/6.2]**, with the results of the assessment summarised below.

No or Neutral Effects

6.8.60 For most of the heritage assets assessed for this chapter, no or neutral effects have been identified upon their settings during the operational phase. With regard to the neutral effects it is acknowledged that although elements of the

Scheme may be intervisible with or appear in wider views containing heritage assets, that these visual intrusions would be very limited and would not materially affect any elements of these assets' settings which are considered to be making a contribution to their cultural value (see **ES Vol 2 Appendix 6-4 [EN010141/DR/6.2]**).

6.8.61 These levels of effect are not significant in EIA terms and will not result in harm. There is, therefore, no mitigation recommended in relation to these levels of effect.

Minor Effects

6.8.62 This assessment has predicted minor adverse effects upon the settings of the following heritage assets during the operational phase (introduced via elements of the Scheme intruding into elements of the assets' settings or into wider views that also include assets considered to have sensitivity to those types of visual intrusion):

- The non-designated moated site (Asset 311) and windmill mound (Asset 328) due to development within Site A;
- The grade I listed Church of St Peter (Asset 48) within Pertenhall, due to the proximity of elements of the development (within Site A) and the potential for wider views of the church spire to be backdropped by elements of the Scheme;
- The grade II listed Chadwell Farmhouse (Asset 129) and Hall Farmhouse (Asset 149) in Pertenhall, due to the proximity of elements of the development (within Site A) that would be within plots historically associated with the farmhouses;
- Heritage assets on the raised ridgeline to the north including the grade II* listed Warren House (Asset 984) and the grade II listed Priory Cottage (Asset 983) due to the potential for the Scheme to be introduced into views from these assets which are considered to be making a contribution to their significance;

- Heritage assets within Kimbolton including the grade I listed Kimbolton School (Asset 795) and associated gatehouse (Asset 796) and the Church of St Andrew (Asset 799) due to their high sensitivity and the potential for limited glimpses of the Scheme within their wider settings;
- Heritage assets within Great Staughton including the Great Staughton Conservation Area (Asset 164) the grade I listed Church of St Andrew (Asset 534) and the grade II listed the Manor (Asset 526) and its associated gatepiers (Listing Number 1214656) and non-designated parkland (Asset 648). These assessed effects are due to the proximity of elements of the development (within Site C) that may encroach in views that are considered to be making a small contribution to their overall significance;
- The Roman small town south of Great Staughton scheduled monument settlement (Asset 991), and the scheduled monuments of Rushey Farm (Asset 2), and two bowl barrows (Asset 13) due to the proximity of elements of the development (within Site C) and its encroachment within potential intervisibility between the assets that are considered to be making a small contribution to their overall significance.
- The Old Manor House, Cretingsbury: a motte castle and moated manor house scheduled monument (Asset 4) due to the encroachment of elements of the development (predominantly within the eastern part of Site B) within areas historically associated with the motte castle which are considered to be contributing to its overall significance;
- The grade I listed Church of All Saints (Asset 38) within Little Staughton. The assessed level of effect upon the church is largely due to some elements of the Scheme being visible from the churchyard (elements of Site B) and the church being a prominent landmark feature with the Scheme appearing in distant views towards the church from the north-west, north and north-east, partially changing some of its rural setting but, crucially, not competing with it as a landmark feature;
- Heritage assets within Little Staughton including the grade II listed Green End Cottage (Asset 40), Tudor Rose Cottage (Asset 134), Green End

House (Asset 148) and the Cottage (Asset 41) due to the proximity of elements of the development within Site B which would be within fields considered to be part of these cottages' immediate rural settings and, therefore, making a contribution to their overall significance;

- Heritage assets within Keysoe including the grade I listed Church of St Mary the Virgin (Asset 19), the grade II listed The Manor (Asset 136), barn to rear of The Manor (Asset 28), Cottage to north of Lavender Cottage (Asset 154), Lavender Cottage (Asset 27) and the locally listed Last Straw Cottage (Asset 28) due to the proximity of elements of the development within Sites A and B which would be within fields considered to be part of these cottages immediate rural settings and, therefore, making a contribution to their overall significance and due to the potential for wider views of the church spire to include or be backdropped by elements of the development;
- The Church of All Saints within Riseley (Asset 332) due to the potential for wider landscape views of the church spire from the west to be backdropped by elements of the development (most likely Site A); and
- Heritage assets within Swineshead including the conservation area (Asset 160) and the grade I listed Church of St Nicholas (Asset 755), largely due to the potential for wider landscape views of the church spire to be backdropped by elements of the development (Sites A and B).

6.8.63 These levels of effect are not significant in EIA terms. They would, however, cause *'less than substantial'* harm to the heritage assets listed above. These assessed levels of *'less than substantial harm'* are considered to be at the low to mid end of the scale. It is not considered that there is any potential to mitigate, beyond that included within the design (i.e. enhancement of existing hedgerows, inclusion of open meadow spaces to break up the areas of solar panels), these effects.

Moderate Effects

6.8.64 This assessment has predicted moderate adverse effects upon the settings of the following heritage assets during the operational phase (introduced via

elements of the Scheme intruding into elements of the assets settings or in to wider views that also include assets considered to have sensitivity to those types of visual intrusion):

- The non-designated possible moated site (Asset 407) within the north-western corner of Site D which would be immediately surrounded on its northern and eastern sides by the Scheme (including the BESS and Substation) which would remove part of its immediate rural setting that is considered to be making a contribution to its overall significance.

6.8.65 These levels of effect are significant in EIA terms. It is assessed that they would cause *'less than substantial'* harm to the heritage assets listed above. These assessed levels of *'less than substantial harm'* are considered to be at the low to mid end of the scale. It is not considered that there is any potential to mitigate, beyond that included within the design (i.e. enhancement of existing hedgerows, inclusion of open meadow spaces to break up the areas of solar panels and between the elements of the BESS and substation), these effects.

Decommissioning Phase

6.8.66 The Scheme will be decommissioned at the end of the operational phase. At this time, all solar panels, inverters and transformers, mounting structures, fencing, and associated infrastructure including the BESS and East Park substation will be removed from Site. Cabling would be removed from the Site, but any cable conduits would likely be left in-situ.

6.8.67 The selected method of decommissioning would have due regard to the management measures set out within the **oDEMP [EN010141/DR/7.6]**. Any future maintenance, decommissioning works or reinstatement works would be subject to prevailing legislation, guidance and permitting regimes. The decommissioning would allow for the baseline land uses (i.e. arable agricultural production) to be restored.

6.8.68 A well-designed decommissioning process would not cause any ground disturbance beyond the already disturbed footprint of the Scheme. It is not, therefore, anticipated that decommissioning works would cause direct impacts upon any buried archaeological remains, deposits or features beyond the existing footprint of the Scheme. The **oAMS [EN010141/DR/7.15]** includes further details in relation to the approach to decommissioning.

6.8.69 It is considered that there is a potential for temporary effects upon the settings of heritage assets during the decommissioning phase, but it is not anticipated that these would cause a level of effect higher than those reported in this chapter for construction and operation of the Scheme. Any decommissioning effects would be temporary and of a shorter duration than the assessed construction effects.

6.8.70 Upon the completion of the decommissioning the long-term effects of the operational phase on the setting of assets would be removed, with the setting of those assets restored to the current baseline condition with the exception of the elements of new green infrastructure (hedgerows and trees) which would have become permanent additions to the landscape.

6.9 Additional Mitigation and Monitoring

6.9.1 There are areas within the Order Limits that have not been accessible for geophysical survey prior to the submission of the DCO (September 2025). These include one field within Site B (sub-area B29).

6.9.2 It is proposed that these areas would be surveyed as part of the *'Site Preparation Works'* described in **ES Vol 1 Chapter 2 [EN010141/DR/6.1]** prior to the construction phase of the Scheme.

6.9.3 The results of the geophysical survey will be assessed and interpreted to gain a clear understanding of potential buried remains in advance of development works. Where appropriate the results will be used to inform any requirements for further trial trenching as part of the Scheme.

6.9.4 The results of the archaeological trial trenching undertaken to date (September 2025), summarised above in Section 6.6, are set out in greater detail in **ES Vol 2 Appendix 6-6 to 6-9 [EN010141/DR/6.2]**. These trial trenching works were based upon an Archaeological Brief that was jointly issued by CHET and BBHET which required two phases of archaeological investigation prior to construction.

6.9.5 As noted above there are areas of the Order Limits that have not been accessible for trial trenching prior to the submission of the DCO. These principally include the cable corridors between East Park Site B to C and East Park Site C to D and the Grid Connection Route as well as two fields within Site B (sub-areas B25 and B29) and one field within Site D (sub-area D02).

6.9.6 It is intended that a WSI for this additional trial trenching will be developed in line with a brief prepared by CHET and BBHET (as is set out in Section 5.3 of the **oAMS [EN010141/DR/7.15]**. Therefore, following the granting of the DCO, a second phase of trial trenching will be undertaken where geophysical survey has been carried out and not intrusively sampled, or not sampled fully, during the pre-application period.

6.9.7 Based upon the works completed to dated (September 2025) 12 AACs (see **oAMS [EN010141/DR/7.15]**) have been identified within the Scheme through non-intrusive investigations, and confirmed by evaluation trenching, as requiring '*Strip, map and sample'* excavation. This would be required to offset the predicted impacts of the planned tree and hedgerow planting and ensure preservation by recorded of the affected assets. The proposed methodology for these areas of *'Strip, map and sample'* excavation is set out in the **oAMS [EN010141/DR/7.15]** and would subject to consultation with BBHET, CHET and HE. A further 29 AACs (see **oAMS [EN010141/DR/7.15]**) have been identified within the Scheme through non-intrusive investigations. Given the results of the trial trenching *'no dig'* solutions would be a suitable mitigation measure within these areas (see **oAMS [EN010141/DR/7.15]**) and such a construction method is proposed to avoid impacts upon the assets within these AACs, though this will be subject to consultation with HE, BBHET and CHET.

6.9.8 It is anticipated that the final number, size and layout of the AACs will be subject to change dependant on the completion of ongoing investigations within Sites A, B, C and D (as well as future investigation within the cable connection routes and grid connection route).

6.9.9 The final proposals for archaeological mitigation will be determined based on the required further archaeological investigation, following consultation with CHET, BBHET and HET and will be secured by the final Archaeological Mitigation Strategy, as secured by a Requirement of the draft DCO **[EN010141/DR/3.1]**.

6.9.10 Any archaeological fieldwork commissioned in order to mitigate direct effects will result in the production and dissemination of a professional archive, which will add to our understanding of the cultural heritage of the Site and the region.

6.10 Residual Effects

Construction Phase

Direct Effects

6.10.1 It is assessed that the completion of the trial trench evaluation and any further mitigation works would either result in direct impacts upon buried archaeological remains either being completely avoided or minimised by design (or utilisation of *'no dig solutions'*) allowing for *'preservation in situ'* or mitigated via programmes of archaeological investigation allowing for any remains to be *'preserved by record'*. The level of residual effects upon buried heritage assets would depend upon the mitigation employed but would either result in avoidance, and thus no effects, or minimisation.

6.10.2 Where avoidance of impacts is not possible, the residual levels of direct effect would be unchanged from the Construction levels assessed above. Significant residual effects are, therefore, predicted upon any archaeological remains which survive within the twelve AACs (AAC-A-2b, AAC-A-3b, AAC-A-5b, AAC-A-6b, AAC-B-1b, AAC-B-2b, AAC-B-5b, AAC-B-6b, AAC-B-10b, AAC-C-5, AAC-D-3b and AAC-D-4b) which would be impacted by the proposed tree and hedge planting, which is needed to mitigate adverse impacts upon a number of other environmental receptors (including adverse impacts upon the setting of some designated heritage assets). It is proposed that these AAC would be subject to a programme of '*strip map and sample'* excavation (see **oAMS [EN010141/DR/7.15]**). The excavation and recording of the assets within these areas would add to our understanding of the historic environment of the Site and the region ensuring that impacts are offset via '*preservation by record'*.

Indirect Effects

6.10.3 Within the proposed development areas, it is not anticipated that the potential or severity of any indirect compression impacts exceeds the potential or severity of direct physical impacts arising from their construction (as noted in

the Section 6.8 above). The construction access roads and permanent access roads have been designed to reduce the potential for compression, with details of these elements provided in Section 7.3 of the **oAMS [EN010141/DR/7.15]**. On this basis no significant residual indirect physical effects related to compression are anticipated.

6.10.4 As liaison with the hydrology team has indicated that as there are no significant excavations or underground obstructions that could affect groundwater movement, it is not anticipated that there would be any significant impacts on groundwater. The **outline Surface Water Management Plan [EN010141/DR/7.13]** would mitigate against any potential increase in run-off and so it is also not anticipated that there would be any increase in scour that could affect archaeology. On this basis no significant residual indirect physical effects related to hydrological changes are anticipated.

Temporary Effects upon Setting

6.10.5 The identified temporary effects upon the setting of designated heritage assets in the vicinity of the site during the construction phase would not continue beyond the completion of the construction phase.

Operational Phase

6.10.6 The assessed levels of residual effects from the operational phase upon heritage assets are predominantly related to the potential visual impact of the completed Scheme. Although it is acknowledged that there may also be noise and traffic (for maintenance etc.) impacts during the operational phase these are not considered to have the potential to exceed the levels assessed for the visual impacts.

6.10.7 With the exception of the minimisation of some effects it is considered that the residual levels of effect would be unchanged from the operational levels assessed above.

6.10.8 Options for offsetting through public benefit are outlined in Section 6.7 and within the **oHES [EN010141/DR/7.16]** prepared as part of the application for development consent. This plan sets out how the Applicant intends to increase the understanding, experience and appreciation of the historic environment.

Decommissioning Phase

6.10.9 The assessed levels of residual effects from the decommissioning phase upon heritage assets are predominantly related to the potential for further direct effects during the removal of piles and other elements of the Scheme which are not anticipated to exceed those of the construction phase and would be mitigated via either avoidance by design or *'preservation in record'* by programmes of archaeological investigation. It is not predicted that the potential temporary effects upon the setting of heritage assets during the decommissioning phase would exceed the levels reported for the construction and operation of the Scheme. On this basis it is not anticipated that there would be any significant adverse residual effects arising from the decommissioning phase.

6.10.10 Upon the completion of decommissioning the long-term effects of the operational phase on the setting of assets would be removed, with the setting of those assets restored to the current baseline condition, with the exception of the elements of new green infrastructure (hedgerows and trees) which would have become permanent additions to the landscape. As such residual effects following decommissioning would be neutral, and, therefore, not significant.

6.11 Cumulative Effects

6.11.1 The cumulative assessment has considered the potential for cumulative effects to heritage assets as a result of the Scheme in combination with the cumulative schemes set out in **ES Vol 2 Appendix 4-5: Short List of Other Development [EN010141/DR/6.2]**.

6.11.2 Cumulative effects relating to cultural heritage are for the most part limited to effects upon the settings of heritage assets. The assessment of cumulative effects considers whether there would be an increased impact, either additive or synergistic, upon the setting of heritage assets as a result of adding the Scheme to the cumulative schemes. In line with HE setting guidance consideration has been given to whether the additional change, which would result from the Scheme will further harm the significance of the asset.

6.11.3 It should be recognised that the cumulative assessment is concerned with the effects of the Scheme in a scenario where the other cumulative schemes are present, rather than the effects of those schemes.

6.11.4 As none of the identified cumulative scheme boundaries extend to within the boundary of the Scheme, no direct or indirect cumulative effects upon buried archaeological remains are anticipated during the construction and decommissioning phases.

6.11.5 It is assessed that there would be no significant cumulative effects upon the settings of any heritage assets during the construction and decommissioning phases (as any such setting effects would be temporary and would not continue beyond the completion of the construction and decommissioning phases). There is, therefore, no potential for significant cumulative effects upon the settings of any heritage assets during the construction and decommissioning phases.

6.11.6 The potential for cumulative effects in relation to cultural heritage is, therefore, considered to be limited to the potential for cumulative effects upon the settings of heritage assets during the operational phase of the Scheme.

6.11.7 The cumulative assessment is reported in full in **ES Vol 1 Chapter 17: Cumulative and In-Combination Effects [EN010141/DR/6.1]** and concludes that there would be no significant cumulative effects on any heritage assets as a result of the Scheme in combination with any cumulative scheme.

6.11.8 No significant cumulative direct or indirect effects upon buried heritage assets have been identified, therefore no additional mitigation measures aimed at offsetting impacts or enhancing heritage assets (beyond those already outlined for the construction and decommissioning Phase effects) are necessary.

6.11.9 No significant cumulative effects upon the setting of heritage assets have been identified, no additional mitigation measures aimed at offsetting impacts or enhancing heritage assets (beyond those already outlined for the operational phase effects) are necessary.

6.11.10 An assessment of the in-combination effects arising from the interaction and combination of different residual environmental effects of the Scheme affecting a single receptor is reported in Section 17.5 of **ES Vol 1 Chapter 17: Cumulative and In-Combination Effects [EN010141/DR/6.1]**.

6.12 Conclusions

6.12.1 This chapter provides an assessment of the likely significant effects of the Scheme upon archaeological and cultural heritage assets. This includes direct and indirect effects resulting from the construction and decommissioning of the Scheme, and effects upon the settings of heritage assets which may arise during operation of the Scheme.

6.12.2 This assessment was conducted with regard to the NPSs (EN-1[89], EN-3[90] and EN-5[91]) and with reference to the NPPF[92], and the accompanying online PPG[93].

6.12.3 Pre-application consultation advice received from BBHET, CHET and HE was also taken into consideration. The primary sources of data for the assessment were Bedford Borough Council and Cambridgeshire County Council (for HER data), Historic England (for NHLE data and aerial photography), Bedford Borough Council and Huntingdonshire District Council (for conservation area information) and Bedfordshire Archives (for historic and cartographic sources) and observations made during the walkover survey and setting assessment site visits. The assessment also makes reference to geophysical survey and trial trenching results (both completed and ongoing) undertaken across the Scheme.

6.12.4 The majority of known assets are anomalies identified during the geophysical survey and through HER recorded cropmarks. Many of these remains appear to be related to prehistoric or Roman settlement, with some potentially representing funerary features which do not seem too dissimilar in character from HER and NHLE recorded assets in the landscape. The geophysical survey also identified a large area of anomalies (c.31ha) thought to be a late prehistoric or Roman town in the northern part of Site C, the extent of which has been scheduled as the Roman small town south of Great Staughton Scheduled Monument in September 2024. The assessment has established that the Scheme would impact upon known remains. Variable levels of effect have been predicted, dependant on the importance of the asset concerned

and works to be undertaken. Whilst a number of potential impacts have been mitigated by design (e.g. through removing solar panels or infrastructure from areas of the Scheme or through the proposed use of no dig construction solutions), a number of Moderate and significant effects have been predicted as a result of proposed tree and hedge planting. These effects would be on archaeological remains within AAC-A-2b, AAC-A-3b, AAC-A-5b, AAC-A-6b, AAC-B-1b, AAC-B-2b, AAC-B-5b, AAC-B-6b, AAC-B-10b, AAC-C-5, AAC-D-3b and AAC-D-4b.

6.12.5 The impacts on the proposed tree and hedge planting, which is needed to mitigate impacts upon a number of environmental receptors, is of a nature that mitigation through avoidance is not possible. As such programmes of archaeological monitoring, excavation and recording which would allow any remains to be *'preserved by record'* are required. Whilst the impact would still occur and the residual effects would thus remain Moderate and significant, the effect would be offset by ensuring that the information content, and thus nature and significance of the assets would be retained.

6.12.6 The assessment has identified temporary significant effects upon the settings of the Old Manor House, Cretingsbury: a motte castle and moated manor house Scheduled Monument (Asset 4) to the east of Little Staughton, the grade I listed Church of All Saints (Asset 38), to the east of Little Staughton, the Roman small town south of Great Staughton Scheduled Monument (Asset 991) within the northern part of Site C and the possible moated site (Asset 407) within the north-western part of Site D during the construction phase.

6.12.7 This assessment had also established that the operational phase of the Scheme would have a significant effect in EIA terms upon the setting of the following heritage asset:

- A non-designated possible moated site (Asset 407) within the northwestern corner of Site D.

6.12.8 No significant effects have been identified upon the settings of any of the other heritage assets considered by this assessment.

6.12.9 Residual setting effects will be as per the effects predicted for the operational phase and in most cases (as noted above) not significant. Significant residual setting effects are anticipated upon the non-designated possible moated site (Asset 407) within the northwestern corner of Site D.

6.12.10 As the overall significance of this asset will remain intact and appreciable the level of harm is considered to be *'less than substantial'*. The policy test in NPS EN-1 specifies that this *'less than substantial'* harm this *'should be weighed against the public benefits of the proposal, including, where appropriate securing its optimum viable use'*[94].

6.13 References

[1] CIfA (2022). *Chartered Institute for Archaeologists' (CIfA) Code of conduct: professional ethics in archaeology.* Available at: https://www.archaeologists.net/sites/default/files/2023-11/CIfA-Code-of-Conduct-2022.pdf [Last Accessed: 05 August 2025].

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[9] Huntingdonshire District Council (2019). Huntingdonshire Local Plan to 2036. Available at: https://huntingdonshire.gov.uk/planning/local-plan-to-2036/ [Last Accessed: 05 August 2025]

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[11] Great Staughton Parish Council (2025). Great Staughton Neighbourhood Plan: Referendum Version - September 2025. Available at: https://www.greatstaughtonpc.org.uk/_files/ugd/2ece00_fd715f9f64b04f419167f2820bfab268.pdf [Last Accessed: 05 August 2025]

[12] CIfA (2022). *Chartered Institute for Archaeologists' (CIfA) Code of conduct: professional ethics in archaeology.* Available at: https://www.archaeologists.net/sites/default/files/2023-11/CIfA-Code-of-Conduct-2022.pdf [Last Accessed: 05 August 2025].

[13] CIfA (2024). *Chartered Institute for Archaeologists' (CIfA) Regulations for professional Conduct.* Available at: https://www.archaeologists.net/sites/default/files/2024-11/CIfA-Regulations-for-Professional-Conduct-2024.pdf [Last Accessed 05 August 2025]

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