EAST PARK ENERGY

East Park Energy

EN010141

Outline Archaeological Mitigation Strategy

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1.0 INTRODUCTION

1.1 Background

1.1.1 This outline Archaeological Mitigation Strategy (oAMS) has been prepared for the East Park Energy project ('the Scheme'). This document has been prepared as part of an application for development consent for the construction, operation and decommissioning of the Scheme. It sets out how the mitigation measures and monitoring requirements identified through the Environmental Impact Assessment (EIA) process will be implemented during construction and has been prepared with the objective of compliance with relevant legislation and policy.

1.1.2 This oAMS is a control document that will be certified as part of the Development Consent Order (DCO) and secured via a Requirement in Schedule 2 of the **draft DCO [EN010141/DR/3.1]**. Should the Scheme be consented, the DCO will require that a final Archaeological Mitigation Strategy (AMS) is prepared prior to the site preparation works.

1.1.3 The purpose of the oAMS is to set out the management of archaeological remains, both known and currently unknown, across the lifetime of the Scheme. The AMS also provides a basis for the preparation of any Written Schemes of Investigation (WSI) required for any later archaeological investigations.

1.2 Document Structure

1.2.1 This oAMS is structured as follows:

- Introduction
- The Scheme
- Archaeological Resource
- Aims and Objectives
- Scope of Required Further Archaeological Investigation
- Archaeological Mitigation Measures

- Application of Archaeological Mitigation Measures
- Reporting, Archiving, and Data Management
- Public Engagement
- Implementation of Archaeological Mitigation Strategy

1.3 Relationship with Other Management Plans

1.3.1 This oAMS is part of a framework of environmental management documents that will be implemented across the lifetime of the Scheme. The following plans are relevant to the protection and management of archaeology across the Site and will be developed separate to the oAMS, pursuant to DCO Requirements:

- **Construction Environmental Management Plan (CEMP)**: This plan will set out how the construction phase of the Scheme will be managed to avoid, reduce, or mitigate environmental impacts. It will cover topics like pollution prevention measures, dust and noise control, protection of wildlife, site waste management, and incident response protocols. The CEMP ensures that commitments made in the ES are translated into practical measures on-site. An **outline Construction Environmental Management Plan [EN010141/DR/7.3]** has been prepared and submitted with the application for development consent;
- **Operational Environmental Management Plan (OEMP)**: This plan will set out how the operational phase of the Scheme will be managed to control environmental risks. An **outline Operational Environmental Management Plan [EN010141/DR/7.5]** has been prepared and submitted with the application for development consent;
- Decommissioning Environmental Management Plan (DEMP): This plan will set out how the decommissioning phase of the Scheme will be managed to control environmental risks. An **outline Decommissioning Environmental Management Plan [EN010141/DR/7.6]** has been prepared and submitted with the application for development consent;

- **Landscape and Ecological Management Plan (LEMP)**: This plan will set out measures for landscape planting, habitat management, and biodiversity net gain, ensuring that mitigation planting and screening vegetation are effectively maintained. An **outline Landscape and Ecological Plan [EN010141/DR/7.7]** has been prepared and submitted with the application for development consent;
- **Soil Management Plan (SMP)**: This plan will ensure the sustainable management of soils and materials by setting out strategies for handling, storage, and reuse of soils. An **outline Soil Management Plan [EN010141/DR/7.9]** has been prepared and submitted with the application for development consent;
- **Surface Water Management Plan (SWMP)**: This plan will detail site-wide measures for managing drainage, rainfall runoff, and groundwater interaction. An **outline Surface Water Management Plan [EN010141/DR/7.13]** has been prepared and submitted with the application for development consent.

1.3.2 Each of these plans will contain specific monitoring and reporting requirements, which will be reviewed regularly by the Site Manager, Environmental Manager, and relevant regulatory authorities. Monitoring results will be documented as part of the compliance framework for the Scheme.

2.0 THE SCHEME

2.1 The Site

Order Limits

2.1.1 The expected maximum area of land potentially required for the construction, operation and maintenance of the Scheme, which includes land required for permanent and temporary purposes, is shown on **ES Vol 3 Figure 1-1: Site Location [EN010141/DR/6.3]**. This is referred to as the 'Order Limits'.

The Site

2.1.2 The 'Site' is located to the north-west of the town of St Neots, and is across two administrative areas; Bedford Borough Council (BBC) (a unitary authority) and Huntingdonshire District Council (HDC) (a two tier authority with Cambridgeshire County Council (CCC). The Site location is shown on **ES Vol 3 Figure 1-1: Site Location [EN010141/DR/6.3]**. The Site area extends to approximately 773 hectares (ha).

2.1.3 With reference to **ES Vol 3 Figure 1-2: Site References [EN010141/DR/6.3]**, for ease of reference the Order Limits have been sub-divided into East Park Sites A to D, in which all of the above ground infrastructure proposed as part of the operational Scheme would be located (excluding works to the Eaton Socon Substation). The Order Limits also cover land outside of East Park Sites A to D which will be required for access, cabling, and the grid connection to the Eaton Socon substation. East Park Sites A to D can be described as follows:

- **East Park Site A** – covering land west of the B660 between Pertenhall and Swineshead at the western end of the Site. East Park Site A comprises arable fields located to the north, west and east side of a small hill that lies between Pertenhall and Riseley. East Park Site A lies either side of the Pertenhall Brook, with access proposed from the B660 to the east.

- **East Park Site B** – covering land between Pertenhall, Keysoe, and Little Staughton. East Park Site B comprises arable fields located north of an elevated ridgeline which runs between Keysoe and Little Staughton. East Park Site B is crossed by a number of small watercourses, with access proposed from the B660, Great Staughton Road, Little Staughton Road, and an unnamed road between Little Staughton and Great Staughton Road.
- **East Park Site C** – covering land south of Great Staughton. East Park Site C comprises arable fields located south of the River Kym, with access proposed from Moor Road to its south-eastern boundary, and from Little Staughton Road to the north-west.
- **East Park Site D** – covering land around Pastures Farm between Great Staughton and Hail Weston. East Park Site D comprises arable fields with access proposed via a new access from the B645.

2.1.4 With reference to **ES Vol 3 Figure 1-2: Site References [EN010141/DR/6.3]**, there are three linear corridors proposed for underground cabling that connect the different parts of the Site and provide a grid connection to the Eaton Socon substation. These are also shown on **Figure 1-2** and identified as:

- **Cable Corridor – Site B to Site C** – which connects Site B to Site C across an unnamed road and arable fields.
- **Cable Corridor – Site C to Site D** – which connects Site C to Site D across Moor Road and an arable field.
- **Grid Connection** – Site D to Eaton Socon substation – which connects Site D to the Eaton Socon Substation and crosses open arable fields, the Duloe Brook, and Duloe Road and Bushmead Road.

Site Context

2.1.5 A detailed description of the heritage baseline is provided in **ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1]** along with supporting appendices in **ES Volume 2 [EN010141/DR/6.2]**.

Designated Heritage Assets

2.1.6 Relevant environmental designations in the vicinity of the Site are shown on **ES Vol 3 Figure 1-3: Environmental Constraints [EN010141/DR/6.3]**.

2.1.7 At the time of EIA Scoping and during the site selection process there were no statutory designated heritage assets within the Site, however archaeological investigation undertaken as part of the environmental assessment of the Scheme has discovered the site of a Roman Town in Site C. Due to the national importance of the archaeological finding, the Applicant has been engaging with Historic England on the find since it was identified in January 2024. Recognising the potential significance of the archaeology, and seeking to protect it in the future, the Applicant made a decision to apply to the Secretary of State for Culture, Media and Sport (via Historic England) to designate the area as a scheduled monument. The application was accepted, and the archaeology was designated as a scheduled monument in September 2024. The location of this scheduled monument is shown on **ES Vol 3 Figure 1-3: Environmental Constraints [EN010141/DR/6.3]**.

2.1.8 There are no other statutory designated heritage assets within the Order Limits. There are a number of listed buildings located within the vicinity of the Order Limits, in and around the settlements of Pertenhall, Keysoe, Swineshead, Little Staughton, Great Staughton and Duloe. Of particular note this includes the Grade I listed Church of St Peter in Pertenhall; the Grade I listed Church of St Mary the Virgin in Keysoe; the Grade I listed Church of All Saints to the east of Little Staughton; and the Grade I listed Church of St Andrew at Great Staughton. There is one scheduled monument adjacent to the southern boundary of East Park Site C (two bowl barrows, 900 m and 1,000 m east of Old Manor Farm). A Roman Site, Rushey Farm Scheduled Monument is located circa 130 m south of the East Park Site C boundary, and 'Old Manor House' Scheduled Monument is located circa 770 m west of the East Park Site C boundary.

2.1.9 The Order Limits are not covered by any conservation areas, with the closest being the Great Staughton Conservation Area, located circa 200 m north of East Park Site C; Swineshead Conservation Area, located circa 750 m west of East Park Site A; and Riseley Conservation Area, located circa 1.2 km south-west of East Park Site A.

Non-Designated Heritage Assets

2.1.10 The previously recorded non-designated Heritage Assets identified within East Park Site A include cropmarks of prehistoric hut circles (Asset 210 in **ES Vol 2 Appendix 6-1: Gazetteer of Heritage Assets and Events [EN010141/DR/6.2]**, and note that all subsequent references to 'Assets' are also with reference to this document); the extent of a medieval deer park (centred Asset 515 and also recorded by the Historic Environment Record (HER) as Asset 514); and post-medieval remains including historically recorded buildings (Assets 178, 188, 321, 736 and 737), a fishpond (Asset 438), a rabbit warren (Asset 335), extraction pits (Asset 173), a field name 'Brick Pastures' thought to be associated with a former brick works (centred Asset 333) and a no longer extant historic routeway (Asset 860). Further cropmarks and earthworks recorded within National Mapping Project data provided by the Bedford Borough HER includes areas of levelled medieval ridge and furrow (centred Assets 814 and 816), and post-medieval steam ploughed cultivation remains (centred Assets 815). 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.

2.1.11 The previously recorded non-designated heritage assets identified within East Park 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 and 275). Three buildings, all of which likely date from at least the post-

medieval period (Assets 186, 322 and 738) and several extraction pits (centred Assets 338 and 340) have also been recorded within East Park Site B. 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. 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). These recorded post-medieval routes in the parish of Little Staughton that run through Area B also include the extant routes of Little Staughton Road and Staughton Road. Further cropmarks and earthworks recorded within National Mapping Project data provided by the Bedford Borough HER include 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) located within East Park Site B.

2.1.12 Within the Cable Corridor – Site B to Site C the previously recorded non-designated heritage assets include an area of levelled ridge and furrow cultivation (centred Asset 678) which is thought to be associated with the historic and deserted settlement known as Garden Farm (centred Asset 593). 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 Cable Corridor – Site B to Site C.

2.1.13 The previously recorded non-designated heritage assets identified within East Park Site C include a findspot of a polished stone axe (Asset 676), undated mounds associated with flints (Asset 584); undated square and rectilinear enclosures (Assets 629, 690, 707 and 710), which are considered likely to be of Roman date 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, and 591 and 639) 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). Further non-designated assets within East Park Site C include the extent of a medieval deer park (centred Asset 668), areas of medieval ridge and furrow cultivation (Assets 680 and 690), the centre point for a former settlement, Garden Farm, Great Staughton (Asset 593) along with earthworks (Asset 987) and banks (Assets 988 to 990). Three post-medieval buildings including two possible farms or ancillary agricultural structures (Assets 184 and 185) and one mill (Asset 190), have also been recorded from historic mapping within East Park Site C. Further cropmarks and earthworks recorded within National Mapping Project data provided by the Bedford Borough HER include areas of ridge and furrow and boundary banks (Assets 830, 937, 943, 944, and 987 to 990) located within East Park Site C.

2.1.14 Within the Cable Corridor – Site C to Site D the only previously recorded non-designated heritage asset is an area of ridge and furrow (Asset 679).

2.1.15 The previously recorded non-designated heritage assets identified within East Park Site D include a possible moated site (Asset 407); a number of ditches (Asset 644); and the eastern extent of a post-medieval quarry (centred Asset 674). Further cropmark remains include those of an undated bank, wall or path (Asset 938) and a medieval boundary bank and earthwork remains of medieval ridge and furrow (centred Asset 773) located within East Park Site D. Previous archaeological investigations within East Park Site D include fieldwalking, topsoil stripping and a watching brief along the route of the Huntingdon to Little Barford Gas Pipeline (Events 571 and 729). A review of the fieldwork report indicates that no archaeological remains discovered along the pipeline are located within the Scheme Boundary. An archaeological evaluation undertaken within fields to the immediate south of East Park Site D (Event 843) between November 2022 and the 31st of January 2023 is recorded as identifying a concentration of five main areas of archaeological activity; with the remainder of the site containing minor

evidence of less important agricultural activity. The finds and features recovered dated from the Middle Iron Age, the Romano-British, the early medieval and the later medieval periods.

2.2 The Scheme

2.2.1 The Scheme comprises a new ground-mounted solar photovoltaic energy generating station and an associated on-site battery energy storage system (BESS) on land to the north-west of St Neots. The Scheme also includes the associated infrastructure for connection to the national grid at the Eaton Socon National Grid Substation.

2.2.2 The Scheme would allow for the generation and export of 400 megawatts (MW) of renewable electricity, as well as the storage of 100 MW of electricity in the BESS. The precise generating capacity and storage capacity will be subject to detailed design, but it should be noted that the Applicant presently has a grid connection agreement with National Grid for 400 MW export and 100 MW import.

2.2.3 Subject to the Scheme securing a DCO in Winter 2026/27 it is anticipated that works would start on site in early 2028 and be completed by mid-to-late 2030 (although initial energisation of the Scheme is likely to commence prior to 2030). The Scheme comprises a temporary development with an operational phase of 40 years; decommissioning activities would therefore likely commence in 2070, 40 years after commissioning.

2.2.4 A more detailed description of the Scheme is provided within **ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1]**.

3.0 ARCHAEOLOGICAL RESOURCE

3.1 Overview of Approach

3.1.1 Establishment of the existing archaeological resource across the Site has followed the following key evaluation phases:

- Desk Based Assessment;
- Archaeological Geophysical Survey; and
- Phase 1 Evaluation Trial Trenching.

3.2 Desk-Based Assessment

3.2.1 The desk based assessment (DBA) for the Scheme has been ongoing throughout the pre-application phase and is reported in **ES Vol 2 Appendix 6-2: Desk Based Assessment [EN010141/DR/6.2]**.

3.2.2 The DBA for the Scheme adopted a tiered, best-practice approach to establish the archaeological baseline and guide mitigation. It is framed by current national energy policy, primary heritage legislation, and Chartered Institute for Archaeologists (CIfA) standards, ensuring regulatory compliance. A 1 km study area was used for direct physical impacts and a 3 km zone for setting, refined in consultation with Bedford Borough and Cambridgeshire Historic Environment Teams, and Historic England. Research combined multiple, complementary methods as follows:

- **Dataset review**: National Heritage List for England, Bedford and Cambridgeshire HERs, conservation-area appraisals and recent scheduling data;
- **Historic sources**: 16th–20th-century mapping, tithe and enclosure plans, documentary place-name and Domesday evidence;
- **Remote sensing**: systematic interrogation of Environment Agency 1 m LiDAR and Historic England vertical & oblique aerial photography, corroborated by National Mapping Programme data;

- **Ground truthing**: targeted walkover surveys to verify extant earthworks and assess terrain visibility and disturbance; and
- **Intrusive & geophysical data**: integration of prior evaluations and project survey data.

3.2.3 All findings are logged in a gazetteer available at **ES Vol 2 Appendix 6-1: Gazetteer of Heritage Assets [EN010141/DR/6.2]**, mapped in GIS and assessed for potential by period.

3.3 Archaeological Geophysical Survey

Approach

3.3.1 The Applicant has undertaken Archaeological Geophysical Survey across the Site in multiple phases between November 2022 and July 2025. The Archaeological Geophysical Survey has been undertaken in accordance with approved written schemes of investigation (WSIs) for each survey, and these WSIs have been appended to the geophysical survey reports which form **ES Vol 2 Appendix 6-5: Archaeological Geophysical Survey Report [EN010141/DR/6.2]**.

Findings

East Park Site A

3.3.2 Six main foci of archaeological activity were identified within East Park Site A. These include anomalies thought to be related to the HER documented prehistoric hut circles (Asset 210) as well as further linear enclosure features and further likely settlement enclosures including ring ditches.

3.3.3 The survey also identified a positive anomaly that could relate to spread out material from a former building (Asset 176), linear positive anomalies that correlate to field boundaries on historic mapping and two areas of highly magnetic dipolar anomalies 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).

3.3.4 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 are recorded within East Park Site A in forms that could not be more confidently interpreted due to being inconsistent or slightly ephemeral.

East Park Site B

3.3.5 Eight main focussed areas of activity were identified within East Park Site B; which most likely represent well-structured settlement systems with double ditch trackways, enclosure systems and possible funerary activity in the form of barrows. Some of the anomalies thought to be indicative of prehistoric settlement correlate with HER recorded cropmarks (Assets 219 and 275) in the southern part of East Park Site B.

3.3.6 The survey also identified a circular area of relatively magnetically quiet response 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 East Park Site B.

3.3.7 Linear positive anomalies that correlate to field boundaries on historic mapping were identified across East Park 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 are recorded within East Park Site B in forms that could not be more confidently interpreted due to being inconsistent or slightly ephemeral. One of these ephemeral anomalies appears to be in the vicinity of D-shaped enclosure cropmarks recorded in the HER (centred Asset 217).

East Park Site C

3.3.8 In the northern part of East Park Site C, across four arable fields, an extensive complex of archaeological anomalies was detected. The focus covered approximately 31 hectares in total and likely extended beyond the survey

area. Both strong and weak positive anomalies were identified, displaying very regular shapes. Linear, curvilinear, and rectilinear forms are highly distinctive and made up the majority of the complex. Additionally, circular and annular forms have been detected within the focus. The entire complex suggested the existence of a highly advanced settlement with possible production activities, such as pottery or metal working located on the margins. This settlement complex likely had a main square where all major roads converged, as well as a well-organized network of roads and domestic enclosures. The settlement possibly extended both to the north and south. AOC Archaeology Group was commissioned by the Applicant to undertake a limited trial trench evaluation, following consultation with HE and CHET, within the possible Roman settlement identified within the northern part of Site C by the geophysical surveys noted above. This evaluation took place in June 2024 and was undertaken to provide supporting information for a scheduling application. The results of the Site C targeted evaluation trial trenching were shared with HE and CHET and led to the decision to protect the site of the Roman small town south of Great Staughton as a scheduled monument (Asset 991, HE List Entry Number: 1491190), which was scheduled in September 2024.

3.3.9 Additionally, the geophysical survey also identified a separate focus of archaeological activity in the southern part of East Park Site C in the form of semi-rectilinear and rectilinear shapes that do not appear to be as dense as the settlement to the north but could still prove to be contemporary.

3.3.10 Linear positive anomalies that correlate to field boundaries on historic mapping were also identified across East Park 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 are recorded within East Park Site C in forms that could not be more confidently interpreted due to being inconsistent or slightly ephemeral.

East Park Site D

3.3.11 The geophysical survey identified scattered archaeological anomalies within East Park Site D in the form of settlement/ enclosure systems and possible trackways which could relate to the area of ditched enclosure cropmarks noted in the HER data (Asset 644).

3.3.12 Linear positive anomalies that correlate to field boundaries on historic mapping were identified across East Park Site D and modern and historic agricultural practices have also been recorded in form of historic ridge and furrows regimes, modern ploughing, and drains.

3.3.13 Further possible archaeological anomalies are recorded within East Park Site D in forms that could not be more confidently interpreted due to being inconsistent or slightly ephemeral and an anomaly of unclear origin was also identified which may be related to the post-medieval quarry (centred Asset 674) but could also be natural in origin.

3.4 East Park Site C Targeted Evaluation Trial Trenching Approach

3.4.1 The first phase of archaeological geophysical survey identified the potential remains of a Roman town within the north of East Park Site C. Following consultation with Historic England and the CCC County Archaeologist, a WSI was agreed for a limited number of targeted trial trenches within the north of East Park Site C to establish the presence or absence of archaeological remains, and the condition and significance of any present remains.

3.4.2 The report for the Site C targeted trial trenching is presented in **ES Vol 2 Appendix 6-8: Site C Trial Trench Evaluation Interim Report [EN010141/DR/6.2]**.

Findings

3.4.3 Four trenches measuring 20m x 3.6m were excavated in May 2024 to target geophysical anomalies within the northern part of East Park Site C. A range of archaeological features were encountered in all four trenches (Trenches 1 to 4).

3.4.4 The archaeological remains found during the targeted trial trenching evaluation show evidence of activity in all four trenches excavated across the Site: the majority of which likely date to the Roman period. There may be some suggestion of earlier activity pre-dating the Roman period (in Trench 4), however this was not definitive within the confines of the trenches.

3.4.5 The archaeological features comprised ditches, pits and postholes and gravel surfaces that represent roads or yard areas; it was suggested during excavation some of the ditches may be associated with beam slots or even bedding trenches for vines.

3.4.6 Provisional results of the targeted trial trench evaluation indicate the majority of the features recorded dated to the Roman period. Although the archaeological features may have been truncated most remains were fairly well preserved with the upper levels of Roman occupation lying directly beneath the modern ploughsoil which was up to 0.4m deep. Overall, it was considered likely that the Roman settlement indicated by the geophysics is present across the Site with fairly good preservation. The report for the archaeological trial trenching within Site C (including these targeted trenches) forms **ES Vol 2 Appendix 6-8: Site C Trial Trench Evaluation Interim Report [EN010141/DR/6.2]**.

3.4.7 The results of the Site C Targeted Evaluation Trial Trenching were shared with Historic England and the CCC Archaeologist and led to the decision to protect the site of the Roman small town south of Great Staughton as a scheduled monument (Asset 991, HE List Entry Number: 1491190), which was scheduled in September 2024.

3.5 Phase 1 Evaluation Trial Trenching

Approach

3.5.1 Following consultation with the Cambridgeshire Historic Environment Team (CHET), Bedford Borough Historic Environment Team (BBHET) and Historic England (HE), it was determined that pre-application trial trenching would be required to investigate the potential for buried archaeological remains.

3.5.2 The Applicant requested a joint brief and this was prepared by CHET and BBHET in May 2024 (on behalf of their respective Local Authorities) and set out the requirements of the required archaeological field evaluation.

3.5.3 The brief requested two phases of archaeological investigation with the first phase to be completed pre-determination and the second to follow as a requirement of the DCO (post-determination).

3.5.4 The scope of the archaeological works was designed to be cognisant of the design brief and the first phase, completed in September 2025 provided trial trench sampling as follows:

- East Park Site A – (c.85.26 ha total development area)
    - High Development Impact Areas = 16 trenches (c.3.5% of c.4.05 hectares),
    - Area of Archaeological Activity = 25 trenches (c.2.5% of c.8.86 hectares),
    - Archaeology Activity 30m buffer = 49 trenches (c.3 to 4% of c.14.61 hectares),
    - Areas with no activity = 99 trenches (c.1.5% of c.57.74 hectares).

- Site B – (c.241.97 ha total development area)
    - High Development Impact Areas = 37 trenches (c.3.5% of c.9.53 hectares)
    - Area of Archaeological Activity = 40 trenches (c.2.5% of c.14.38 hectares)

- Archaeology Activity 30m buffer = 86 trenches (c.3 to 4% of c.26.07 hectares)
- Areas with no activity = 341 trenches (c.1.5% of c.204.70 hectares)

- East Park Site C – (c. 62.21 ha total development area)
  - Roman Town 250m Buffer = 94 trenches (c.4% of c.21.07 hectares)
  - Area of Archaeological Activity = 7 trenches (c.2.5% of c.2.62 hectares)
  - Archaeology Activity 30m buffer = 20 trenches (c.3 to 4% of c.6.27 hectares)
  - Areas with no activity = 54 trenches (c.1.5% of c.32.85 hectares)

- East Park Site D – (c.65.22 ha total development area)
  - High Development Impact Areas = 37 trenches (c.3.5% of c.9.41 hectares)
  - Area of Archaeological Activity = 21 trenches (c.2.5% of c.6.92 hectares)
  - Archaeology Activity 30m buffer = 22 trenches (c.3 to 4% of c.6.57 hectares
  - Areas with no activity = 46 trenches (c.1.5% of c.42.32 hectares)

3.5.5 The WSI for the above works was prepared and agreed with both CHET and BBHET and is appended to the trenching report which forms **ES Vol 2 Appendix 6-6: Site A Trial Trench Evaluation Interim Report [EN010141/DR/6.2].**

Findings

East Park Site A

3.5.6 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.

3.5.7 A total of 33 trenches were excavated in sub-area A01, five contained archaeological features (Trenches 11, 13, 23, 24 and 33). In Area A01, the archaeological features were centred in the area (with exception of Trench 33) and represent the heavily truncated remains of enclosures, likely for agricultural use (of a currently unknown date). The archaeological features identified appear to largely correspond with geophysical survey anomalies (Anomalies 34a and 34d) recorded in the area.

3.5.8 A total of 21 trenches were excavated in sub-area A02, ten contained archaeological features (Trenches 35, 37, 42, 43, 45-49 and 53). The archaeological features within A02 again largely correspond with the geophysical survey anomalies (Anomalies 36a and 36b) recorded in the area. These features took the form of ditches corresponding with what appears to be a large rectangular enclosure surrounding at least three circular enclosures (there were few discrete features so potentially animal enclosure rather than settlement, currently considered likely to date to the later prehistoric period).

3.5.9 A total of nine trenches were excavated in sub-area A03, three contained archaeological features (Trenches 59, 61 and 63). The archaeological remains recorded within A03 were characterised as ditches and furrows (with the furrows being visible in the geophysical survey) and trenching that targeted linear anomalies (Anomaly 35a) at the western end of the area identified no remains.

3.5.10 A total of 11 trenches were excavated in sub-area A04, five contained archaeological features (Trenches 66 to 69 and 71). The activity identified within A04 strongly correlated with geophysical anomalies (Anomaly 38a) recorded in the area and is characterised as ditches associated with field systems or enclosure (currently of unknown date).

3.5.11 A total of 15 trenches were excavated in sub-area A05 (Trenches 75-89) and a further five trenches were excavated in sub-area A06 (Trenches 90 to 94), none of which contained any archaeological features.

3.5.12 A total of 30 trenches were excavated in sub-area A07, seven contained archaeological features (Trenches 100, 101 105, 107-109 and 118). The archaeological remains recorded within A07 were characterised as field boundaries and enclosure (currently undated), which in the centre of the area corresponded strongly with geophysical anomalies (Anomaly 39a). The picture was more mixed in the southeastern part of the area with one ditch being identified where there was no corresponding geophysical anomaly (in Trench 118) whilst the trenching that was targeted upon anomalies (Anomaly 39b) in the southeastern part of the area identified no remains.

3.5.13 A total of 38 trenches were excavated in sub-area A08, 21 contained archaeological features (Trenches 125-130, 132, 134-136, 139-146, 148,158 and 162). The archaeological remains recorded within A08 include linear ditches, pits and a curvilinear enclosure (similar to those in A02 and A07) which were located in the centre and north of the area which correlated with the recorded geophysical anomalies (Anomalies 41a and 41b) thought to be associated with HER recorded settlement cropmarks (Asset 210). The HER recorded quarry pit (Asset 173) in the northern part of the area was also identified in the trenching. Further features were identified within the southwestern part of the area (in Trenches 158 and 162) that have no corresponding geophysical anomalies. It is thought that the archaeology is representative of late prehistoric settlement activity (though this will need to be confirmed).

3.5.14 A total of 23 trenches were excavated in sub-area A09, five contained archaeological features (Trenches 166, 167, 172, 182 and 183). The archaeology recorded in sub-area A09 represents low density agricultural activity in the form of boundaries and furrows spread across this area. The recorded ditches in the east of the area have correlating geophysical survey

anomalies (Anomaly 31a) and may be a continuation of the enclosures recorded within sub-area B01 in Area B.

3.5.15 Overall, the evidence retrieved from the trenching suggests a landscape utilised for farming within the late prehistoric and early Roman period, 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.

3.5.16 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]**.

East Park Site B

3.5.17 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 have contained archaeological features.

3.5.18 A total of three trenches were excavated in sub-area B03 (Trenches 253, 259 and 260), three trenches were excavated in sub-area B06 (Trenches 316-318), eight trenches were excavated in sub-area B07 (Trenches 319-326), twelve trenches were excavated in sub-area B08 (Trenches 312-315 and 327-334), four trenches were excavated in sub-area B09 (Trenches 335-338), nine trenches in were excavated sub-area B10 (Trenches 339-347), three trenches were excavated in sub-area B16 (Trenches 458, 459 and 460), four trenches were excavated in sub-area B22 (Trenches 544-547), 19 trenches were excavated in sub-area B24 (Trenches 539-543 and 594-608), and six

trenches were excavated in sub-area B30 (Trenches 664-669); none of which contained any archaeological remains.

3.5.19 A total of 31 trenches were excavated in sub-area B01, 11 of which contained archaeological features (Trenches 193-198, 200, 201, 207, 210 and 211). The archaeological features were spread across the area and likely represent the heavily truncated remains of agricultural use of the site in the form of enclosure ditches (which correlate with geophysical anomaly 7a) with some more discrete features being identified in the form of potential waste pits. The dating is currently unclear, but it's suggested that a late prehistoric, early Roman date is most likely.

3.5.20 A total of 36 trenches were excavated in sub-area B02, six of which contained archaeological features (Trenches 220, 223, 225, 229, 236, and 243). The recorded features include ditches and the odd pit and post hole (none of which correlate to any geophysical anomalies identified in the area) with no clear dating evidence being retrieved.

3.5.21 A total of 27 trenches were excavated in sub-area B04, five of which contained archaeological features (Trenches 266, 268, 277, 279 and 280). All but one of the trenches contained evidence of a field boundary depicted on OS mapping whilst the other feature, a gully (in Trench 268), was also likely associated with post-medieval agriculture.

3.5.22 A total of 25 trenches were excavated in sub-area B05, three of which contained archaeological features (Trenches 290, 297 and 300). These features included isolated ditches and the odd pit which are currently interpreted as being associated with post-medieval agricultural activities.

3.5.23 A total of 28 trenches were excavated in sub-area B11, eight of which contained archaeological features (Trenches 352, 357-359, 365, 368, 370 and 371). Most of the features identified appear to correlate to field boundaries depicted on OS mapping though it was suggested in the field that activity recorded within Trench 359 may be related to earlier prehistoric

activity based on the characteristics of some intercutting pits and ditches (a lack of datable material may make this difficult to interpret further).

3.5.24 A total of 11 trenches were excavated in sub-area B12, one of which contained archaeological features (Trench 393). The recorded features appear to correlate with geophysical survey anomalies (geophysical anomaly 12a) and may represent evidence for curvilinear animal enclosures (currently undated).

3.5.25 A total of 29 trenches were excavated in sub-area B13, four of which contained archaeological features (Trenches 398, 400, 407 and 409). The archaeological remains included ditches which appear to represent enclosures (currently undated), some of which were mapped as geophysical anomalies (geophysical anomaly 10a).

3.5.26 A total of 23 trenches were excavated in sub-area B14, five of which contained archaeological features (Trenches 427, 428, 438, 445 and 449). The archaeological remains included ditches which appear to represent enclosures (currently undated), all of which were mapped as geophysical anomalies (geophysical anomalies 11a, 11b and 11c).

3.5.27 A total of eight trenches were excavated in sub-area B15, two of which contained archaeological features (Trenches 452 and 453). These features were potential post-holes of unknown date with no other nearby recorded activity.

3.5.28 A total of 20 trenches were excavated in sub-area B17, one of which contained archaeological features (Trench 478). The only feature was a potential post-hole of unknown date with no other nearby activity recorded.

3.5.29 A total of 35 trenches were excavated in sub-area B18, 16 of which contained archaeological features (Trenches 376-379, 383, 387, 482, 484, 485, 490, 492, 494-497 and 502). The north of sub-area B18 contained evidence of field boundaries depicted on OS mapping whilst the south of the area contained a vast amount of archaeological evidence which was in keeping with what was

suggested by the geophysical survey (geophysical anomalies 18a, 18b and 18c). It has been suggested this activity is representative of a Romano-British ladder settlement with many ditches present, some of which present multiple phases of use with ditch recuts, as well as more discrete features such as pits.

3.5.30 A total of 19 trenches were excavated in sub-area B19, 11 of which contained archaeological features (Trenches 506, 507, 512-514, 516, 517, and 519-522). Further archaeological activity was recorded in high quantities, again confirming the geophysical survey results in this area (geophysical anomaly 20a). These features also included ditches and pits, but the geophysics suggest more curvilinear enclosure to be present here which may suggest a different type of settlement or occupation of this area than is present in sub-area B18.

3.5.31 A total of seven trenches were excavated in sub-area B20 (Trenches 523-529), all of which contained archaeological features. The archaeological activity recorded in sub-area B20 (which had no corresponding geophysical anomalies) may relate to peripheral activities on the outskirts of the settlement recorded in sub-area B19, though this interpretation will be dependent on dating evidence retrieved and whether the activity in sub-areas B18, B19 and B20 are contemporary, or represent a landscape utilised over multiple periods.

3.5.32 A total of 10 trenches were excavated in sub-area B21, five of which contained archaeological features (Trenches 532, 535-537 and 605). The archaeological features in this area are interpreted as being representative of low density, currently undated, agricultural activity in the form of boundaries (which broadly correlate to geophysical Anomalies 26a and 26b) and furrows.

3.5.33 A total of 46 trenches were excavated in sub-area B23, twelve of which contained archaeological features (Trenches 548, 549, 551, 554, 556, 557, 563, 567, 568 582, 587 and 588). Most of the archaeological features in this area are interpreted as being representative of low density, currently undated,

agricultural activity in the form of boundaries (some of which broadly correlate to geophysical anomalies 21b and 21d) and furrows. In the south of sub-area B23, there was an area of activity suggested in the field to be earlier prehistoric enclosures (which correlate with geophysical anomaly 21a) based on the characteristics of some intercutting pits and ditches, though a lack of datable material may make this difficult to interpret further.

3.5.34 A total of seven trenches were excavated in sub-area B26, one of which contained archaeological features (Trench 609). The features recorded in this area are interpreted as being representative of low density, currently undated, agricultural activity in the form of a field boundary.

3.5.35 A total of sixteen trenches were excavated in sub-area B27, nine of which contained archaeological features (Trenches 618, 619, 621 and 625-630). The archaeological features in this area are also interpreted as being representative of low density, currently undated, agricultural activity in the form of boundaries and furrows. In the southwest of sub-area B27, there is a concentration of activity (correlating with geophysical anomaly 27a) including ditches and pits of uncertain date with one of the ditches recorded containing a fragmented human skull within its fill alongside a large mandible.

3.5.36 A total of eleven trenches were excavated in sub-area B31, five of which contained archaeological features (Trenches 673, 675, 677, 678 and 679). The features recorded in this area are interpreted as being representative of low density, currently undated, agricultural activity in the form of a field boundaries and furrows.

3.5.37 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.

3.5.38 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]**.

East Park Site C

3.5.39 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.

3.5.40 A total of 30 trenches were excavated in sub-area C01, 16 of which contained archaeological features (Trenches 682, 683, 687, 689, 690, 693-699, 702, 757, 760 and 761). The trenches within sub-area C01 displayed a cluster of archaeological features which matched the linear anomalies recorded by the geophysical survey (geophysical anomalies 66a and 66b) although nine trenches that were not targeting geophysical anomalies contained archaeological features (Trenches 682, 683, 693, 695, 702, 757, 760, 761 and 687). The majority of the features in this area were ditches dating to the Roman period, with four pits also dating to this period. A large portion of the ditches correlated with the linear geophysical anomalies (geophysical anomalies 66a and 66b) which represent a series of field systems and sub-square enclosure. Medieval activity within sub-area C01 is represented by six ditches, five gullies and two pits. A series of former field boundaries correlating with a 19th century OS map were excavated in Trenches 682, 693, 694 and 689. Additionally, over 16 slots through furrows were excavated in this area. A small number of ditches and pits produced no dating evidence.

3.5.41 A total of 28 trenches were excavated in sub-area C02, eight of which contained archaeological features (Trenches 704, 705, 707, 711, 714, 716, 717 and 720). Only one of the trenches (Trench 705) that was targeting a geophysical anomaly (geophysical anomaly 65b) encountered any archaeological remains with the other features being discovered in areas that contained no correlating anomalies. The recorded features in this area included four ditches and two pits dating to the Roman period as well as a post-medieval ditch and nine undated ditches.

3.5.42 A total of eight trenches were excavated in sub-area C03, two of which contained archaeological features (Trenches 767 and 769). The recorded features included one ditch, four post holes and two pits, however none contained dating evidence.

3.5.43 A total of 109 trenches were excavated in sub-area C04, 31 of which contained archaeological features (Trenches 730, 731, 736, 747, 754, 776, 779, 792, 794,797, 798, 801-804, 806, 808, 810, 814, 819, 821-823, 830-832, 839,840, 842, 843 and 847). While the most notable archaeological remains uncovered in sub-area C04 were Roman cremation burials (within Trench 803) most archaeological features were represented by ditches and pits, with some post holes and gullies (most of which corelated to geophysical anomalies 43a, 43b, 43c and 43d). One wall foundation overlain by a stone surface was also recorded during the archaeological investigations. Eleven of the trenches contained features dating to the Roman period (Trenches 736, 797, 798, 803, 808, 821, 822, 823, 830, 831 and 832). No datable material was uncovered from the majority of the remaining features in sub-area C04, although their proximity to the Roman settlement and to trenches with Roman archaeology suggests a Roman date, a later date cannot be entirely ruled out.

3.5.44 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.

3.5.45 The report for the archaeological trial trenching within Site C forms **ES Vol 2 Appendix 6-6: Site C Trial Trench Evaluation Interim Report [EN010141/DR/6.2]**.

East Park Site D

3.5.46 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.

3.5.47 A total of 36 trenches were excavated in sub-area D01 (Trenches 857 to 865 and Trenches 870-897), with three of these containing archaeological features (Trenches 861, 872 and 874).

3.5.48 A total of 18 trenches were excavated in sub-area D03 (Trenches 898 to 915), with seven of these containing archaeological features (Trenches 902, 904 to 906, 910, 912 and 913).

3.5.49 A total of 47 trenches were excavated in sub-area D04 (Trenches 919 to 965), with 27 of these containing archaeological features (Trenches 919, 922, 924-925, 927, 930, 932-933, 935-936, 938, 940-952, 957 and 964-965). A further three trenches in sub-area D04 (Trenches 928, 934 and 939) revealed archaeological features that were recorded on the pre-excavation survey but not investigated further during the evaluation (it was agreed on Site with CHET that where linear features were present within two or more trenches and appeared to correspond with the geophysical survey the features were only investigated in one trench).

3.5.50 A total of 16 trenches were excavated in sub-area D05 (Trenches 966 to 981), with seven of these containing archaeological features (Trenches 966, 968-972 and 978).

3.5.51 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.

3.5.52 The report for the archaeological trial trenching within Site D forms **ES Vol 2 Appendix 6-9: Site D Trial Trench Evaluation Interim Report [EN010141/DR/6.2]**.

3.6 Summary

3.6.1 The archaeological investigations described above and set out in greater detail within the **Environmental Statement [EN010141/DR/6.1 / 6.2 / 6.3]** are sufficient to establish the archaeological resource across the Site, such that the potential impacts and likely significant effects of the Scheme have been assessed within **ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1]**.

3.6.2 Notwithstanding the above, the Applicant is committed to further archaeological research and investigation prior to construction of the Scheme, in order to establish the archaeological mitigation measures to be embedded into the detailed design of the Scheme. The anticipated scope of required further archaeological investigation is set out within Section 5.0 of this oAMS.

4.0 AIMS AND OBJECTIVES

4.1 Aims

4.1.1 The overall aim will be to mitigate against the loss of any archaeological remains that may be impacted upon by the Scheme. Where possible, there will be a preference to conserve buried archaeological deposits through mitigation by design which will preserve them in situ (either through use of concrete ground anchors or removal of areas from the Scheme). Where this is not achievable, mitigation by record will be undertaken in the form of archaeological excavation and/or archaeological monitoring.

4.2 Objectives

4.2.1 The aims will be realised through the achievement of the following objectives:

- To establish the spatial extent, date, character, condition and significance of the archaeological activity in the proposed archaeological mitigation areas;
- To recover information relating to the nature and function of past human activity represented by the surviving archaeological remains;
- To identify areas where the conservation of archaeological features can be achieved by preservation in situ;
- Where preservation of archaeological features in situ cannot be achieved, to excavate and record identified archaeological features and deposits to a level appropriate to their extent and significance;
- To assess the potential for survival of environmental evidence;
- To interpret the nature of human activity within the Scheme and to place identified archaeological remains in their local, regional and national context as appropriate;
- To assess the site formation processes and the effects that these may have had on the survival and integrity of the archaeological features and deposits;

- To undertake sufficient post-excavation assessment to confidently interpret identified archaeological features;
- To undertake sufficient post-excavation analysis of artefacts and environmental samples to interpret their significance;

  Report and publish the results of the excavation and post-excavation analysis and place them within their local, regional and national context; and
- To compile and deposit a site archive at a suitable repository and provide information for the Bedfordshire and Cambridgeshire HERs and the Higgins, Bedford/Cambridgeshire County Council's Archaeological Archive Facility to ensure the long term survival of the excavated data.

5.0 SCOPE OF REQUIRED FURTHER ARCHAEOLOGICAL INVESTIGATION

5.1 Background

5.1.1 As set out in Section 3.0 of this oAMS, the Applicant is committed to further archaeological research and investigation prior to construction of the Scheme. The purpose of this further investigation is to establish the final archaeological mitigation measures to be embedded into the detailed design of the Scheme, secured by this oAMS.

5.2 Geophysical Survey

5.2.1 There is one area within the Order Limits that has not been accessible to survey prior to the submission of the DCO, one field within Site B (sub-area B29).

5.2.2 It is proposed that this area 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.

5.2.3 In line with the previous archaeological geophysical surveys the aims of the gradiometer survey are:

- To locate, record and characterise any potential surviving sub-surface archaeological remains within the survey area; and
- To produce a comprehensive site archive and report.

5.2.4 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.

5.3 Phase 2 Evaluation Trial Trenching

General

5.3.1 As set out in Section 3.0, the archaeological brief 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.

5.3.2 The general aim of these investigations, as is outlined in an approved WSI that was produced in line the brief provided by BBHET and CHET in May 2024, is to more accurately establish the potential for the presence/absence of archaeologically significant remains allowing the mitigation measures set out in Section 6.0 to be applied appropriately.

5.3.3 The evaluation will comprise the excavation of evaluation trenches, the final number and specific locations of which will be determined in consultation with CHET, BBHET and HE to ensure they are appropriately placed to answer specific archaeological questions.

General Aims

5.3.4 The general aims of the archaeological evaluation, as outlined in the approved WSI and in compliance with the CIfA' Standard and Universal guidance for archaeological field evaluation are:

- To establish the presence/absence of archaeological remains within the Scheme;
- To determine or confirm the approximate date or date range of the remains, by means of artefactual or other evidence;
- To assess the depth, condition and significance of the buried remains present within the Scheme;
- To record any archaeological remains encountered;

- To determine the degree of complexity of the horizontal and/or vertical stratigraphy present;
- To determine the extent of previous truncations of the archaeological deposits;
- To provide further information as to the significance of the assets to the archaeological advisors at BBHET regarding Sites A and B and CHET regarding Sites C and D; and
- To make available to interested parties the results of the investigation.

Specific Aims

5.3.5 The specific aims of the archaeological evaluation, as outlined in the approved WSI, in compliance with the CIfA' Standard and Universal guidance for archaeological field evaluation, are:

- To ground truth the results of the geophysical survey;
- To investigate the areas of archaeological activity indicated by the geophysical survey within Sites A, B, C and D;
- To determine the character and composition of any structural remains;
- To determine the date, function and nature of any cut features;
- To identify any in-situ internal or external surfaces present;
- To retrieve datable material when available;
- To determine whether any in situ remains of roads or tracks are present;
- To determine whether any alluvial or colluvial deposits are present;
- To determine whether any palaeosols, old land surfaces or palaeochannels are present;
- To investigate the areas with no recorded archaeological anomalies within Sites A, B, C and D in order to test whether there is a greater level of archaeology than indicated in the geophysical survey;
- To establish whether there is any variation of date or function of the remains across the site, and are any activity zones present; and

- To determine how the results of the evaluation can contribute to the East of England Regional Research Framework (2021). In particular to topics related to Roman Towns, Infrastructure and Finds Studies.

5.4 Further Evaluation Trial Trenching

5.4.1 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).

5.4.2 It is intended that a WSI for this additional trial trenching will be developed in line with a new brief prepared by CHET and BBHET.

5.4.3 The aims of this trial trenching will be the same as those outlined in Sections 5.3.4 and 5.3.5 with the only changes being the areas being investigated.

5.5 Programme

5.5.1 Subject to the Scheme securing a DCO in Winter 2026/27 it is anticipated that the programme of required further archaeological investigation would commence in Spring 2027 and be completed by Autumn 2027, in advance of construction commencing on Site in early 2028.

5.5.2 The programme for further archaeological investigation will be agreed between the Applicant and the appointed Archaeological Contractor. CHET, BBHET and HE will be informed of the programme prior to the works commencing.

6.0 ARCHAEOLOGICAL MITIGATION MEASURES

6.1 Approach to Mitigation

6.1.1 Once the required further archaeological investigation described in Section 5.0 has been completed, the extent of the archaeological resource across the whole Scheme will be fully established and, using the principles set out within this section, final archaeological mitigation measures applied.

6.1.2 The programme of archaeological mitigation measures will comprise the following main elements:

- Preservation in-situ (Mitigation by Design);
- Strip, Map and Sample;
- Open Area Excavation; and
- Archaeological Monitoring.

6.1.3 The methodologies that will be adopted to implement the above archaeological mitigation measures are set out in Section 6.2.

6.1.4 Archaeological mitigation measures for specific areas of the Site are set out in Table 1 below, and shown on Figures 1 to 3 of this oAMS.

Table 1: Archaeological Mitigation Measures for East Park Energy

Site Location	ES Gazetteer / Geophysical Survey Reference	Area of Archaeological Constraint	Archaeological Mitigation Measure	Total Area (hectares)
East Park Site A	Geophysical Survey Anomaly 34a	AAC-A-1	Utilisation of No Dig solutions (see Section 7.3 for details).	0.75ha
East Park Site A	Geophysical Survey Anomaly 36a	AAC-A-2a	Utilisation of No Dig solutions (see Section 7.3 for details).	3.7ha
East Park Site A	Geophysical Survey Anomaly 36a	AAC-A-2b	Area proposed for woodland planting, no dig solution not feasible. Proposed	0.13ha

Site Location	ES Gazetteer / Geophysical Survey Reference	Area of Archaeological Constraint	Archaeological Mitigation Measure	Total Area (hectares)
			strip map and sample excavation of this area.	
East Park Site A	Geophysical Survey Anomaly 38a	AAC-A-3a	Utilisation of No Dig solutions (see Section 7.3 for details).	1.9ha
East Park Site A	Geophysical Survey Anomaly 38a	AAC-A-3b	Area proposed for woodland planting, no dig solution not feasible. Proposed strip map and sample excavation of this area.	0.47ha
East Park Site A	Asset Number 333 Geophysical Survey Anomaly 39a	AAC-A-4	Utilisation of No Dig solutions (see Section 7.3 for details).	2.08ha
East Park Site A	Asset Numbers 173, 210, 178 and 321 Geophysical Survey Anomaly 41a and 41b	AAC-A-5a	Utilisation of No Dig solutions (see Section 7.3 for details).	8.52ha
East Park Site A	Asset Numbers 210, 178, 321 and 737 Geophysical Survey Anomaly 41a and 41b	AAC-A-5b	Area proposed for woodland planting, no dig solution not feasible. Proposed strip map and sample excavation of this area.	1.78ha
East Park Site A	Geophysical Survey Anomaly 31a	AAC-A-6a	Utilisation of No Dig solutions (see Section 7.3 for details).	1.15ha

Site Location	ES Gazetteer / Geophysical Survey Reference	Area of Archaeological Constraint	Archaeological Mitigation Measure	Total Area (hectares)
East Park Site A	Geophysical Survey Anomaly 31a	AAC-A-6b	Area proposed for woodland planting, no dig solution not feasible. Proposed strip map and sample excavation of this area.	0.38ha
East Park Site B	Geophysical Survey Anomaly 7a	AAC-B-1a	Utilisation of No Dig solutions (see Section 7.3 for details).	2.17ha
East Park Site B	Geophysical Survey Anomaly 7a	AAC-B-1b	Area proposed for woodland planting, no dig solution not feasible. Proposed strip map and sample excavation of this area.	0.43ha
East Park Site B	Asset Number 817 Geophysical Survey Anomaly 7a	AAC-B-2a	Utilisation of No Dig solutions (see Section 7.3 for details).	1.94ha
East Park Site B	Asset Number 817 Geophysical Survey Anomaly 7a	AAC-B-2b	Area proposed for woodland planting, no dig solution not feasible. Proposed strip map and sample excavation of this area.	0.55ha
East Park Site B	Geophysical Survey Anomaly 10a	AAC-B-3	Utilisation of No Dig solutions (see Section 7.3 for details).	2.62ha
East Park Site B	Geophysical Survey Anomaly 18d	AAC-B-4	Utilisation of No Dig solutions (see Section 7.3 for details).	1.46ha
East Park Site B	Asset Number 275	AAC-B-5a	Utilisation of No Dig solutions (see Section 7.3 for details).	6.75ha

Site Location	ES Gazetteer / Geophysical Survey Reference	Area of Archaeological Constraint	Archaeological Mitigation Measure	Total Area (hectares)
	Geophysical Survey Anomaly 18a, 18b and 18c			
East Park Site B	Asset Number 275 Geophysical Survey Anomaly 18a, 18b and 18c	AAC-B-5b	Area proposed for woodland planting, no dig solution not feasible. Proposed strip map and sample excavation of this area.	1.91ha
East Park Site B	Geophysical Survey Anomaly 20a and 20c	AAC-B-6a	Utilisation of No Dig solutions (see Section 7.3 for details).	5.25ha
East Park Site B	Geophysical Survey Anomaly 20a and 20c	AAC-B-6b	Area proposed for woodland planting, no dig solution not feasible. Proposed strip map and sample excavation of this area.	0.13ha
East Park Site B	Geophysical Survey Anomaly 11a	AAC-B-7	Utilisation of No Dig solutions (see Section 7.3 for details).	1.51ha
East Park Site B	Geophysical Survey Anomaly 28a	AAC-B-8	Utilisation of No Dig solutions (see Section 7.3 for details).	0.86ha
East Park Site B	Geophysical Survey Anomaly 28b	AAC-B-9	Utilisation of No Dig solutions (see Section 7.3 for details).	1.09ha
East Park Site B	Asset Number 274 Geophysical Survey Anomaly 27b	AAC-B-10a	Utilisation of No Dig solutions (see Section 7.3 for details).	1.06ha

Site Location	ES Gazetteer / Geophysical Survey Reference	Area of Archaeological Constraint	Archaeological Mitigation Measure	Total Area (hectares)
East Park Site B	Asset Number 274 Geophysical Survey Anomaly 27a	AAC-B-10b	Area proposed for woodland planting, no dig solution not feasible. Proposed strip map and sample excavation of this area.	0.73ha
East Park Site B	Geophysical Survey Anomaly 21d	AAC-B-11	Utilisation of No Dig solutions (see Section 7.3 for details).	1.33ha
East Park Site B	Geophysical Survey Anomaly 21a	AAC-B-12	Utilisation of No Dig solutions (see Section 7.3 for details).	0.73ha
East Park Site B	Geophysical Survey Anomaly 26b	AAC-B-13	Utilisation of No Dig solutions (see Section 7.3 for details).	0.55ha
East Park Site B	Geophysical Survey Anomaly 26a	AAC-B-14	Utilisation of No Dig solutions (see Section 7.3 for details).	0.83ha
East Park Site C	Asset Number 987 Geophysical Survey Anomaly 66a and 66b	AAC-C-1	Utilisation of No Dig solutions (see Section 7.3 for details).	3.50ha
East Park Site C	Asset Number 593 Geophysical Survey Anomaly 65a and 65b	AAC-C-2	Utilisation of No Dig solutions (see Section 7.3 for details).	1.79ha
East Park Site C	Asset Number 937 Geophysical Survey Anomaly 43a	AAC-C-3	Utilisation of No Dig solutions (see Section 7.3 for details).	4.51ha

Site Location	ES Gazetteer / Geophysical Survey Reference	Area of Archaeological Constraint	Archaeological Mitigation Measure	Total Area (hectares)
East Park Site C	Geophysical Survey Anomaly 43c	AAC-C-4	Utilisation of No Dig solutions (see Section 7.3 for details).	3.69ha
East Park Site C	Area immediately to the south of the Roman Small Town south of Great Staughton Scheduled Monument (Asset 991) Geophysical Survey Anomaly 43b and 43d	AAC-C-5	Area proposed for woodland planting, no dig solution not feasible. Proposed strip map and sample excavation of this area.	1.30ha
East Park Site C	Asset Number 991 Geophysical Survey Anomaly 42a to 42f, 44a to 44c, 46a to 46b and 47a to 47d	Roman Small Town south of Great Staughton Scheduled Monument	Land use will change from arable farmland to grassland meadow (reduced impacts over time allowing for preservation in situ). Small area towards southern end of the Scheduled Area will be crossed by a buried cable (HDD method proposed) and temporary access track. Details of design mitigation measures to prevent any impacts upon Scheduled Remains in Section 7.2.	46.37ha
East Park Site D	Geophysical Survey Anomaly 52a	AAC-D-1	Utilisation of No Dig solutions (see Section 7.3 for details).	1.29ha
East Park Site D	Geophysical Survey Anomaly 49c	AAC-D-2	Utilisation of No Dig solutions (see Section 7.3 for details).	0.41ha

Site Location	ES Gazetteer / Geophysical Survey Reference	Area of Archaeological Constraint	Archaeological Mitigation Measure	Total Area (hectares)
East Park Site D	Asset Number 644 Geophysical Survey Anomaly 49a	AAC-D-3a	Utilisation of No Dig solutions (see Section 7.3 for details).	9.10ha
East Park Site D	Geophysical Survey Anomaly 49a	AAC-D-3b	Area proposed for woodland planting, no dig solution not feasible. Proposed strip map and sample excavation of this area.	0.20ha
East Park Site D	Geophysical Survey Anomaly 49b	AAC-D-4a	Utilisation of No Dig solutions (see Section 7.3 for details).	2.41ha
East Park Site D	Geophysical Survey Anomaly 48a and 49b	AAC-D-4b	Area proposed for woodland planting, no dig solution not feasible. Proposed strip map and sample excavation of this area.	0.50ha
East Park Site D	Asset Number 674 Geophysical Survey Anomaly 48a to 48d	AAC-D-5	Utilisation of No Dig solutions (see Section 7.3 for details).	2.83ha
East Park Site B Area 29 (sub-area B29)	-	Geophysical survey and trial trenching (yet to be completed in the area) may identify further AACs.	Archaeological Monitoring (see Section 6.2 for details)	-
East Park Site D Area 51 (sub-area D02)	-	No AACs identified via geophysical survey data alone, trenching may identify AACs.	Archaeological Monitoring (see Section 6.2 for details)	-

Site Location	ES Gazetteer / Geophysical Survey Reference	Area of Archaeological Constraint	Archaeological Mitigation Measure	Total Area (hectares)
Cable Connection Site B to Site C	-	No AACs identified via geophysical survey data alone, trenching may identify AACs.	Archaeological Monitoring (see Section 6.2 for details)	-
Cable Connection Site C to Site D	-	No AACs identified via geophysical survey data alone, trenching may identify AACs.	Archaeological Monitoring (see Section 6.2 for details)	-
Grid Connection	-	No AACs identified via geophysical survey data alone, trenching may identify AACs.	Archaeological Monitoring (see Section 6.2 for details)	-

6.1.5 It is anticipated that the final number, size and layout of the AACs listed above will be subject to change dependant on the results of further investigations within Sites B (sub-areas B25, B28 and B29) and D (sub-area D02) as well as future trial trench investigation within the cable connection routes and grid connection route.

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

6.2 Archaeological Mitigation Measures

Preservation In-Situ (Mitigation by Design)

6.2.1 Where possible, areas of potentially extensive or significant archaeological remains will be preserved in situ. Areas of proposed grassland and meadow within the Order Limits are not anticipated to have any potential for impacts

upon archaeological remains within their extents and, therefore, any archaeological remains within these areas would be '*preserved in situ'*.

6.2.2 The management of areas that will be *'preserved in situ'* as part of proposed areas of species diverse grassland or neutral grassland are as per the requirements for these habitat types set out in the **outline Landscape Environmental Management Plan (oLEMP) [EN010141/DR/7.15]**.

6.2.3 Twenty-nine 'Areas of Archaeological Constraint' (see table above) have been identified within the Scheme through non-intrusive investigations, and confirmed by evaluation trenching, as containing more extensive archaeological features. Although impacts on any such remains from the solar mounts would be limited, it is proposed that the potential for any impact will be mitigated through the use of non-intrusive surface-mounted pre-cast concrete ground anchors, which is a standard accepted approach to removing the impact of solar mounts upon potential archaeological sub-surface remains (BRE 2013, 13). The appropriateness of this approach in these areas will be subject to consultation with HE, BBHET and CHET.

6.2.4 It is proposed that where temporary access tracks are utilised the surface matting employed in these areas will prevent direct impacts and compaction upon any buried archaeological remains (subject to this approach being deemed appropriate following consultation with HE, BBHET and CHET) allowing for their '*preservation in situ'* (for details see section 7.3).

6.2.5 Sub-surface horizontal directional drilling will be employed beneath a section of the Small Roman Town at Great Staughton Scheduled Monument in the eastern part of East Park Site C. The c.10m depth of the horizontal directional drilling through this area should ensure *the 'preservation in situ'* of the Scheduled remains. The area will be accessed via the utilisation of a temporary access track which will be designed to avoid any potential compaction of the ground surface. Full details of these design and construction methodologies can be found in Section 7.3.

Strip, Map and Sample

6.2.6 Twelve Areas of Archaeological Constraint (see table above) have been identified within the Scheme through non-intrusive investigations, and confirmed by evaluation trenching, as requiring *'Strip, map and sample'* excavation.

6.2.7 *'Strip, map and sample'* excavation will be employed where archaeological evaluation has identified potential archaeological remains but based on current evidence, these do not appear to be extensive or potentially significant enough to warrant open-area excavation or the avoidance of impacts via *'preservation in situ'* (Mitigation by Design).

6.2.8 Following machine topsoil excavation, a pre-excavation plan of identified potential archaeological features will be produced. This plan will be used to agree an excavation sampling strategy with BBHET or CHET (depending on the location of the features), in order to decide which features, require hand excavation and the '*sample'* of how much of these features should be excavated.

6.2.9 An indicative sampling strategy is provided below, however, this will be re-examined in liaison with the BBHET or CHET (depending on the site location). It is noted that BBHET or CHET will provide briefs which would then be used to create site-specific strategies and reflected in site specific WSIs.

- 100% excavation of all stake-holes;
- 100% excavation of all structural, funerary or ritual features;
- 100% excavation of all post-holes and pits with a diameter of less than 0.4m;
- 50% excavation of pits between 0.4m and 1.5m in diameter;
- 25% excavation of pits with a diameter of over 1.5m. This will include a complete section across the pit to recover its full profile;
- 10% excavation of all linear features, up to 5m in length; and

6.2.10 Reduced percentage excavation of longer linear features, to be agreed with BBHET or CHET (depending on the location of the features). All archaeological features and deposits revealed will be cleaned and excavated by hand in an archaeologically controlled and stratigraphic manner, in order to establish their extent, form, date, function and relationship to other features. All features will be investigated to understand the full stratigraphic sequence down to naturally occurring deposits.

6.2.11 Any excavation, by machine or by hand, will be undertaken with a view to avoiding damage to any archaeological features or deposits which appear to be demonstrably worthy of preservation in situ. No machine excavation of archaeological deposits or features will be undertaken without agreement from BBHET or CHET (depending on the location of the features).

6.2.12 There will be sufficient excavation to give clear evidence for the period, depth and nature of any archaeological deposit. The depth and nature of colluvial or other masking deposits will be established across the site.

6.2.13 Provision for onsite conservation and finds treatment, in addition to any scientific dating of materials uncovered, will be undertaken where appropriate (including consideration of archaeomagnetic dating to fired structures, such as kilns, furnaces, ovens and hearths prior to their excavation). The scientific dating techniques will be reviewed in regards to the aims and objectives of the project and in reference to the Historic England document *'Radiocarbon Dating and Chronological Modelling'* (2022).

6.2.14 During the Strip, Map and Sample excavation, where it has been established that areas of the site under investigation do not contain archaeological remains, these areas will be signed-off to allow for construction groundworks to proceed, following agreement with BBHET or CHET (depending on the location of the features).

Open Area Excavation

6.2.15 No areas have been identified within the Scheme through non-intrusive investigations, and confirmed by evaluation trenching, as requiring open area excavation.

6.2.16 If identified as necessary following further investigations, immediately following mechanical excavation, any exposed archaeological features will be surveyed using survey-grade (centimetre accurate) GPS equipment, and/or a total station as required, to produce a pre-excavation plan of initially identified potential archaeological features.

6.2.17 All survey data will be accurately tied into the Ordnance Survey National Grid and Ordnance Datum Newlyn levels using survey-grade (centimetre accurate) GPS equipment and/or total stations.

6.2.18 All archaeological features and deposits revealed will be excavated by hand in an archaeologically controlled and stratigraphic manner, in order to establish their extent, form, date, function and relationship to other features.

6.2.19 The following excavation strategy is identified as a guide, however, this will be re-examined in liaison with the BBHET or CHET (depending on the site location). It is noted that BBHET or CHET will provide briefs which would then be used to create site-specific strategies and reflected in site specific WSIs.

- 100% excavation of all stake-holes;
- 100% excavation of all funerary features;
- 100% excavation of all post-holes and pits with a diameter of less than 0.4m;
- 50% excavation of pits between 0.4m and 1.5m in diameter;
- 25% excavation of pits with a diameter of over 1.5m. This will include a complete section across the pit to recover its full profile;
- 20% excavation of all linear features, up to 5m in length; for features greater than this, a 10% sample will be excavated. For field boundaries

over 5m in length, of a post-medieval date, sections will be excavated to confirm their date, but a full 10% sample will not be required;

- Deposits at junctions, intersections and interruptions in linear features will be excavated over a sufficient length to determine the stratigraphic relationships between the different components;
- It is anticipated that for discrete features such as ring ditches, post holes and pits, the remaining fills will be rapidly removed to maximise recovery of artefactual and other evidence;
- Built structures, such as walls, will be examined to a degree whereby their extent, form, date, function and relationship to other features and deposits can be established; and
- Any in situ building remains will be fully recorded for the extent that they are exposed. Brick and stone samples will be taken if potentially diagnostic of date or function.

6.2.20 All archaeological features and deposits revealed will be cleaned and excavated by hand in an archaeologically controlled and stratigraphic manner, in order to establish their extent, form, date, function and relationship to other features. All features will be investigated to understand the full stratigraphic sequence down to naturally occurring deposits. Any excavation, by machine or by hand, will be undertaken with a view to avoiding damage to any archaeological features or deposits which appear to be demonstrably worthy of preservation in situ. No machine excavation of archaeological deposits or features will be undertaken without agreement from BBHET or CHET (depending on the location of the features).

6.2.21 There will be sufficient excavation to give clear evidence for the period, depth and nature of any archaeological deposit. The depth and nature of colluvial or other masking deposits will be established across the site.

6.2.22 Provision for onsite conservation and finds treatment, in addition to any scientific dating of materials uncovered, will be undertaken where appropriate (including consideration of archaeomagnetic dating to fired structures, such as kilns, furnaces, ovens and hearths prior to their excavation). The scientific

dating techniques will be reviewed in regards to the aims and objectives of the project and in reference to the Historic England document *'Radiocarbon Dating and Chronological Modelling'* (2022).

6.2.23 Apart from where not otherwise needed due to engineering requirements, and with the agreement of BBHET or CHET (depending on the location of the features), it is assumed that archaeological excavation areas will be backfilled on completion.

Archaeological Monitoring

6.2.24 It is anticipated that there will be discrete areas within the Scheme that will require archaeological monitoring (largely constrained to the areas of buried cable route and potentially areas of access road), which will be determined via consultation with CHET and BBHET.

6.2.25 All topsoil or overburden stripping across these areas will be undertaken using 360° tracked excavators fitted with toothless, flat bladed, grading buckets, down to the first significant archaeological horizon or natural sub-soil.

6.2.26 A suitably qualified and experienced Archaeological Clerk of Works will monitor groundworks in the specified areas and record any features in line with the recording methodology for strip, map and sample excavation detailed above.

6.2.27 The archaeological monitoring of construction groundworks will include the following:

- archaeological inspection of overburden / topsoil removal
- inspection of subsoil for archaeological features
- excavation, recording and environmental sampling of features necessary to determine their date and character

6.2.28 The principal contractor, or any other groundworks contractors operating on site, will allow sufficient time for any archaeological features to be excavated, sampled and recorded to meet the requirements of this oAMS.

6.2.29 Every effort will be made to implement the archaeological monitoring without affecting the construction timetable, however, some limited suspension of groundworks in specific areas of the Scheme under investigation may be required in order to record and sample any archaeological evidence uncovered (in line with the '*Strip, Map and Sample'* methodology provided above). The length of stoppage time will be determined by the nature of archaeological features or deposits identified.

6.2.30 Where it can be demonstrated that survival conditions are such that archaeological potential is negligible, BBHET or CHET (depending on the area) will be informed and, if agreed, the archaeological monitoring may be suspended in specific areas.

6.2.31 The results of the archaeological monitoring will be fully integrated with results of the excavation stage and the overall post-excavation assessment and analysis.

6.3 Fieldwork Methodology

Written Scheme of Investigation

6.3.1 The appointed Archaeological Contractor will produce site specific WSIs ahead of the archaeological works. These site specific WSIs will be produced with reference to this oAMS document but also provide the specific details of the work required for a given area. The site specific WSIs would include data management plans that would have reference to the CIFA Dig Digital Toolkit (https://archaeologists.net/work/toolkits/dig-digital).

Mobilisation

6.3.2 BBHET or CHET (depending on the area) will be informed at least two weeks in advance of the commencement of any fieldwork, or stages of fieldwork, within the Scheme.

6.3.3 Prior to the commencement of archaeological fieldwork, the appointed Archaeological Contractor will familiarise themselves with all existing

documentation and reports relating to previous stages of archaeological investigation within the site, and any other relevant documents as necessary.

6.3.4 The appointed Archaeological Contractor will be provided with all available information relating to health and safety on the site, including any mapped utilities and any other constraints that may affect the mitigation works.

6.3.5 All works will be archived under the accession numbers obtained from the Bedford Borough (BEDFM 2024.23) and Cambridgeshire County Council's Archaeological Archive Facilities (ECB7315). The appointed Archaeological Contractor will complete all archive deposition forms as required.

6.3.6 Before fieldwork commences, an OASIS online record will be initiated, and key fields completed on Details, Location and Creator forms.

Mechanical Excavation

6.3.7 Topsoil or overburden across the mitigation excavation areas will be stripped using 360° tracked excavators fitted with a toothless, flat bladed, grading bucket, down to the first significant archaeological horizon or natural subsoil.

6.3.8 All mechanical excavation will be undertaken under direct archaeological supervision, by a suitably experienced and qualified archaeologist, with one archaeologist responsible for monitoring each excavator.

6.3.9 All areas of excavation will be scanned with a Cable Avoidance Tool (CAT) prior to ground works commencing. Necessary measures will be taken to avoid disturbing any services.

6.3.10 Mechanical excavators will work backwards from the starting point of the excavation to avoid tracking over stripped areas.

6.3.11 Mechanical excavators and other plant will not track or drive over an area that has been stripped until an archaeologist has confirmed that no archaeological remains are present, or that any features have been fully archaeologically recorded.

6.3.12 The stripped surface will be kept clean and free of loose spoil until fully archaeologically investigated and recorded.

6.3.13 If required, areas of archaeological remains will be fenced-off to prevent accidental damage.

6.3.14 Spoil from mechanical excavation will be scanned by eye and by metal detector to aid the recovery of finds.

6.3.15 Topsoil and subsoil will be stored separately in accordance with the **outline Soil Management Plan [EN010141/DR/7.15]**. Excavated topsoil will be redeposited at a location to be determined in agreement with the principal contractor and the Applicant. All spoil will be stored and managed safely in line with the standards of the Construction Code of Practice for Sustainable Use of Soils on Construction Sites (DEFRA 2009).

6.3.16 Should the excavation of the trenches reach the limit of safe working depth without natural geology being encountered, a machine dug sondage will be excavated in order to establish the depth of natural geology, provided this will have no detrimental effects upon archaeological deposits. Where depth of excavation is required to be greater than 1m, suitable stepping will be employed.

6.3.17 At least one end of each trench or excavation area will be ramped to provide safe access and egress for staff and to enable any wildlife that may accidentally fall into the trenches to escape.

Hand Excavation

6.3.18 All archaeological features and deposits revealed will be excavated by hand in an archaeologically controlled and stratigraphic manner, in order to establish their extent, form, date, function and relationship to other features.

6.3.19 All features will be investigated to understand the full stratigraphic sequence down to naturally occurring deposits. Where depth of excavation is required to be greater than safe working depth, suitable stepping will be employed.

6.3.20 Metal detector searches will take place at all stages of the mitigation fieldwork, over archaeological features and excavated spoil. Any metal finds will be located using survey-grade GPS and metal detectors will be set not to discriminate against iron.

6.3.21 Metal detecting will also be conducted over the surface of all exposed features before the end of each working day as a countermeasure to 'nighthawking'.

6.3.22 The stripped surface will be kept clean and free of loose spoil until fully archaeologically investigated and recorded. Wherever possible, spoil arising during hand-cleaning and hand-excavation will be piled beyond the limits of excavation.

6.3.23 A full written, drawn and photographic record will be made of all features revealed during the course of the archaeological mitigation works.

6.3.24 All archaeological features or deposits encountered will be described fully on proforma individual context recording sheets, using standard methods of the archaeological contractor appointed.

6.3.25 Plans will be completed at a scale of 1:20 with a site plan at 1:100 (as appropriate), with section drawings at a scale of 1:10. All plans will be tied in with the Ordnance Survey National Grid with levels given to above ordnance datum using cm accurate survey grade GPS equipment.

6.3.26 A photographic record, utilising high resolution digital photography of a minimum of 12 megapixels and in RAW format, will be maintained during the course of the fieldwork and recorded in a photographic register. This will include:

- the site prior to commencement of fieldwork;
- the site during work, showing specific stages of fieldwork;
- the layout of archaeological features within the site;
- individual features and, where appropriate, their section; and
- groups of features where their relationship is important.

6.3.27 All photography will follow industry best practice (Historic England 2015b). Images will be converted to uncompressed baseline v.6 TIFF for archiving. All images will have accompanying metadata specifying; photo ID, capture device, converting software, colour space, bit depth, resolution, date of capture, photographer, caption, and any alterations made to the image.

Finds Recovery

6.3.28 All identified finds will be collected, retained, bagged and labelled according to their context. Finds of significant interest will be given a '*special finds*' number, and information on their location in three dimensions will be entered on a separate proforma sheet.

6.3.29 No finds will be discarded without assessment by an appropriate finds specialist, and/or the approval of BBHET or CHET (depending on the area of recovery).

6.3.30 It is anticipated that unstratified 20th and 21st century material will be noted, spot dated as required, and discarded.

6.3.31 All finds and samples will be treated in a proper manner during the excavation stage.

6.3.32 Finds will be exposed, lifted, bagged, conserved and stored in accordance with the guidelines set out in United Kingdom Institute for Conservation's Conservation Guidelines No. 2 and the CIfA guidelines Standard and Guidance for the collection, documentation, conservation and research of archaeological materials (2020c).

6.3.33 Any finds that could be considered treasure under the terms of the Treasure Act 1996 (with subsequent amendments) Act and under covered during the process of fieldwork should be immediately reported to the Finds Liaison Officer, so that it is properly reported to the appropriate Coroner within 14 days of discovery in line with the Treasure Act. Advice and guidance on compliance with Treasure Act issues would be undertaken with the Finds

Liaison Office of the Portable Antiquities Scheme at either the BBHET or CHET office (depending on the location of the recovered artefact.

Sampling

6.3.34 Buried soils and associated deposits will be inspected on site by a suitably qualified geoarchaeologist whose advice should be sought as to whether soil micromorphology or other analytical techniques will enhance understanding of depositional processes and transformations at the site. If so, suitable samples should be taken from relevant deposits or features for assessment. On encountering preserved buried soils during trenching, the trench strip depth should be raised to enable hand excavation in 1m square test pits on a grid along the trench to examine the artefact content and for sampling such old land surfaces soils. This could be on a 5m grid if the soils occur along the full length of the trench, or a suitable array of grouped test pits if the soils are found in discrete patches. The remaining soil layer should then be stripped out by machine or by hand accordingly.

6.3.35 Environmental samples will be recovered from suitable deposits that might help to characterise local environmental development or inform on the characterisation of land-use for the local area.

6.3.36 Attention will be paid to:

- the retrieval of charred plant macro & microfossils, faunal remains and land molluscs from former dry-land palaeosols and cut features;
- the retrieval of plant macro & microfossils, insect, faunal remains, molluscs, pollen and other biological remains from waterlogged deposits located; and
- provision for the absolute dating of critical contacts should be made: e.g. the basal contacts of peats over former dryland surfaces.

6.3.37 Bulk samples, 20L for wet and 40L for dry contexts will be taken from appropriate contexts for the recovery and assessment of environmental data.

Provision will be made for column and other appropriate samples to be taken. Sampling methods will follow Historic England guidelines (HE 2015c).

6.3.38 The detailed sampling strategies will be included within the site specific WSIs which 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.

Human Remains

6.3.39 The Ministry of Justice and the Archaeological Advisor to the relevant Local Planning Authority will be informed if human remains are found. The contractor will comply with all statutory consents and licences under the Disused Burial Grounds (Amendment) Act 1981 or other Burial Acts regarding the exhumation and interment of human remains.

6.3.40 If human remains are encountered, they will be cleaned with minimal disturbance, prior to recording and removal, following receipt of the required Ministry of Justice licence. Investigation and excavation of human remains will be undertaken by, or under supervision of, suitably experienced specialist staff and in accordance with former *Institute of Field Archaeologists (IFA) guidelines Excavation and Post-excavation Treatment of Cremated and Inhumed Human Remains* (McKinley and Roberts 1993) and *Guidelines to the standards for recording human remains* (Brickley and McKinley 2004). Assessment of excavated human remains will be undertaken in line with current English Heritage guidelines *Human Bones from archaeological sites: Guidelines for the production of assessment documents and analytical reports* (English Heritage 2004) and *Guidance for Best Practice for Treatment of Human Remains Excavated from Christian Burial Grounds in England* (Church of England/Historic England 2017).The archaeological contractor will comply with all reasonable requests of interested parties as to the method of removal, re-interment or disposal of the remains or associated items. Every effort will be made, at all times, not to cause offence to any interested parties.

6.3.41 If required a qualified and experienced osteoarchaeologist will undertake site visits to discuss the recording and assist in the removal of any human skeletal remains.

Unexpected Significant or Complex Discoveries

6.3.42 Should unexpectedly extensive, complex or significant remains be uncovered that warrant, in the professional judgment of the archaeologists on site, more detailed recording or extensive excavation than is appropriate in the terms of this oAMS, the scope of the individual WSI for that element of the work will be reviewed and an alternative strategy will be proposed for agreement with BBHET or CHET (depending on the area).

7.0 APPLICATION OF ARCHAEOLOGICAL MITIGATION MEASURES

7.1 Introduction

7.1.1 This section of the oAMS sets out the archaeological mitigation measures that will be applied during each phase of the Scheme:

- Pre-Construction Phase (Site Preparation Works);
- Construction Phase;
- Operational Phase; and
- Decommissioning Phase.

7.2 Pre-Construction Phase (Site Preparation Works)

7.2.1 The Applicant is proposing to undertake the further archaeological investigation works set out in Section 5.0 of this oAMS during the pre-construction phase as part of the Site Preparation Works described in **ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1]** and the **draft DCO [EN010141/DR/3.1]**.

7.2.2 Site specific WSIs will be prepared and agreed with BBHET and CHET for the further archaeological investigation, and the Applicant will undertake and report on the further archaeological investigation in a timely manner in accordance with the provisions of the WSI.

7.2.3 The results of the further archaeological investigation will inform the preparation of a final Archaeological Mitigation Strategy for the construction phase, which will be in substantial accordance with this outline Archaeological Mitigation Strategy and agreed with BBHET, CHET and Historic England prior to commencing the construction phase of the Scheme.

7.3 Construction Phase

7.3.1 This section sets out mitigation measures to be adopted during the detailed design and construction phase of the Scheme to avoid and minimise impacts on the archaeological resource. Mitigation measures are identified for any works that are proposed within the Areas of Archaeological Constraint (AACs), and then separately for the works proposed within the scheduled monument in East Park Site C.

7.3.2 Further environmental mitigation measures for the construction phase of the Scheme are also set out in the **outline Construction Environmental Management Plan [EN010141/DR/7.3]**.

Areas of Archaeological Constraint

7.3.3 The Applicant has identified AACs within the Order Limits as set out in Section 6.0. Within these areas, the Applicant will apply the mitigation measures identified within Table 1 of this oAMS.

Access Tracks

Temporary Access Tracks

7.3.4 Temporary access tracks within the AACs will utilise interlocking heavy duty plastic matting (e.g. IsoTrack H) overlaid on a geomembrane as shown on **ES Vol 3 Figure 2-2h: Indicative Access Tracks [EN010141/DR/6.3]**. This matting has very high load capacities and is designed to support loads of up to 150 tonnes while preventing rutting beneath, even on soft soils. The mats spread wheel loads over a broad area and 'gently flex' with ground contours so no ground preparation is required for installation.

7.3.5 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 shallow drainage swales either side of the tracks to retain and convey water, thereby avoiding increased run-off, waterlogging, or erosion either side of the temporary access track. These swales will be

shallow and contained within the existing topsoil (depth varies across the Scheme, between 200mm and 400mm) to avoid deep excavation into archaeology. Excavation of the drainage swales will be undertaken with oversight from the Archaeological Clerk of Works.

7.3.6 On completion of the construction phase, the heavy duty plastic matting and geomembranes will be removed, and soils replaced to remove the temporary drainage swales. The soils below the temporary access track will be inspected and whilst significant compaction is not expected, any issues will be alleviated (e.g. using a deep tine aerator to a depth of up to 200mm). Grassland will be established along the alignment in accordance with the **outline Landscape and Ecological Management Plan [EN010141/DR/7.7]** to re-bind the soils and prevent erosion of the bare topsoil.

7.3.7 The indicative location of temporary access tracks during the construction phase are shown on **ES Vol 3 Figure 2-5: Indicative Construction Access and Compounds [EN010141/DR/63]**.

Permanent Access Tracks

7.3.8 Permanent access tracks within the AACs will be avoided as part of the final Scheme design as far as practicable, however where this is not possible the access tracks will be constructed using the following approach.

7.3.9 The alignment of the permanent access tracks will be marked out and the topsoil will be carefully stripped under the guidance of the Archaeological Clerk of Works to a depth of up to 250mm. Any excavated soils will be checked for archaeological remains before removal. A geomembrane will be laid within the excavated area, on which a rigid geogrid system will be placed and a 250mm layer base of type 1 (or similar) aggregate will be placed.

7.3.10 As the permanent access tracks will be constructed above the typical top-soil horizon between top-soil and sub-soil (where the archaeological remains would typically be located), there would therefore be limited direct impact to buried archaeological remains. Archaeological remains would be preserved

in-situ beneath the access tracks. At the time of decommissioning the Scheme after 40 years the access tracks would be removed and topsoil replaced within the trenches.

7.3.11 Drainage will be provided in accordance with the **outline Surface Water Management Plan [EN010141/DR/7.13]**.

Solar Array Mounting

7.3.12 As set out in Table 1 of this oAMS, in the AACs located within the area proposed for Work No. 1 on the **Works Plan [EN010141/DR/2.3]**, solar arrays will be mounted utilising 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]**. These concrete ground anchors are a standard accepted approach to removing the impact of solar mounts upon potential archaeological sub-surface remains. The appropriateness of this approach in these areas will be subject to consultation with HE, BBHET and CHET.

Solar Transformers (and Centralised Inverters)

7.3.13 Solar transformers (and centralised inverters if utilised) will be located outside of AACs as far as practicable. Where this is not possible, an appropriate archaeological mitigation approach will be confirmed by liaison with BBHET or CHET (depending on the location of the works) which would be undertaken in line with a methodology outlined in a WSI following a brief.

High and Low Voltage Cabling

7.3.14 High and low voltage cabling is proposed under Work No. 6 as identified on the **Works Plan [EN010141/DR/2.3]**. This cabling will be located outside of AACs as far as practicable, but where this is not possible cables will be installed within secure surface-mounted conduits, separate from areas accessible by the public.

Extra High Voltage Cabling – Grid Connection

7.3.15 If AACs are identified along the alignment of the grid connection between East Park Site D and the Eaton Socon substation as part of the further archaeological investigation set out in Section 5.0 of this oAMS, the Applicant will undertake a 'strip, map and sample' approach along the alignment of the trenched cable under the oversight of the Archaeological Clerk of Works. If archaeological remains of a greater extent/significance are found than first anticipated, an alternative approach would be agreed with either BBHET or CHET depending on location; for the most significant archaeology this could include horizontal directional drilling beneath archaeological remains.

Fencing

7.3.16 The proposed perimeter security fencing for the solar areas will result in limited areas of direct impact. Given the limited footprint of these impacts it is proposed that the impact of any fencing within AACs could be mitigated/offset by additional trial trenching within these areas undertaken as part of the Phase 2 trenching.

Drainage

7.3.17 Any proposed drainage measures that would be delivered in accordance with the **outline Surface Water Management Plan [EN010141/DR/7.13]** will be outside of AACs as far as practicable. Where required within AACs, swales will be utilised with a maximum depth of up to 300mm (i.e. within the topsoil layer) to avoid impacts on the sub-surface archaeology.

Landscaping

7.3.18 The AACs identified in Table 1 of this oAMS include areas within Work No. 8 as proposed on the **Works Plan [EN010141/DR/2.3]**. In these areas, if planting is proposed then the Applicant will undertake 'strip, map and sample' prior to the planting of any woodland areas and hedgerows. Areas of grassland will be seeded and left, with archaeology preserved in-situ.

Roman Small Town south of Great Staughton, Scheduled Monument

7.3.19 Scheduled monument consent under section 2(3) of the Ancient Monuments and Archaeological Areas Act 1979 will not be required due to the operation of section 33(1)(f) of the Planning Act 2008, which disapplies the need for Scheduled monument consent where development consent is required for a development.

7.3.20 The works to the scheduled monument within the Site are:

- installation of the Scheme's electrical cables by Horizontal Directional Drilling (HDD) beneath the monument; and
- temporary access across the monument during construction.

7.3.21 The following mitigation measures will be implemented in relation to the above works.

Installation of the Scheme's electrical cables by Horizontal Directional Drilling

7.3.22 HDD is a trenchless crossing method commonly used to install underground ducts to accommodate cables in a shallow angled bore along a prescribed path by using a surface operated drill rig located outside of the sensitive area.

7.3.23 Archaeological trial trenching undertaken within Site C (which includes the extent of the Roman Small Town and the area to its south) has recorded no archaeological remains extending beyond a depth of 1.5m below ground level (bgl), with the deepest sequence of archaeological deposits encountered within Trench 4, which was excavated within the Roman Town prior to its scheduling. The types of archaeological feature encountered have generally included ditches and pits and deeper stratified features such as wells, mines or quarry pits have not been encountered (**ES Vol 2 Appendix 6-8: Site C Trial Trench Evaluation Interim Report [EN010141/DR/6.2]**). Further trial trenching undertaken within Site D (nearest trenching c.600m to the east of

the Roman Small Town) has also revealed similar features (pits and ditches, likely of Iron Age to Roman date) with none of the excavated remains extending beyond a depth of 1.5m bgl (**ES Vol 2 Appendix 6-9: Site D Trial Trench Evaluation Interim Report [EN010141/DR/6.2]**).

7.3.24 Deeper archaeological remains contemporary to the Roman activity identified above have been identified during works in the wider region. A pair of Roman dated wells discovered during works associated with the National Highways A428 Black Cat to Caxton Gibbet (c.8.2 km south southeast of the Roman Small Town) improvements in Bedfordshire and Cambridgeshire were measured as extending to depths of 8.5m bgl and 6.5m bgl respectively (MOLA, 2024). Overall, however, the potential for this type of deeper well archaeological feature within the Scheme appears to be very low, given the lack of evidence for these types of features identified during the trial trenching and as well as presence of natural watercourse (the River Kym) adjacent to the Roman Small town.

7.3.25 Prior to commencing the HDD operations, a small temporary compound (will be established (up to 25m x 30m) outside of (and with an appropriate buffer to) the Scheduled Monument. The location of these compounds would be informed by the further archaeological investigation set out in Section 5.0 to establish the best locations which avoid or minimise harm to any other archaeological remains.

7.3.26 The HDD bore will be drilled at 10m below ground level to avoid and provide a suitable offset to the archaeological remains above. Full control can be maintained over the depth and direction of the drill as it crosses the scheduled area.

7.3.27 An indicative arrangement for the proposed HDD crossing of the scheduled monument is shown on the drawing in Appendix A of this oAMS. This drawing shows indicative locations for the temporary launch and reception compounds, as well as the alignment of the HDD bore. These locations are indicative only and as set out above, the final siting will be based on the further

archaeological investigation completed during the pre-construction phase, and agreed with Historic England and CHET.

7.3.28 The HDD process requires the use of bentonite as a lubricant for the drill bore. The use of the material will be carefully controlled to avoid a breakout and/or spillage from tanks and plant at the drive shaft. A 'Frac-Out Contingency Plan' will be provided by the Principal Contractor in advance of the work starting, as set out in the **outline Construction Environmental Management Plan [EN010141/DR/7.3]**. The drilling fluid returns will be monitored to ensure no inadvertent leaks, and if there are any discrepancies identified, the Frac-Out Contingency Plan will be implemented.

7.3.29 Bentonite will be recycled during the HDD process and will be disposed of as a controlled waste during and following the completion of drilling activities. Storage containers will be provided at both the launch site and the reception site to contain any bentonite slurry arisings.

7.3.30 Once the HDD bore is completed, plastic conduit is pulled through the bore, within which the cables will eventually be winched through the conduit from either end. In this way there will be no future maintenance requirements within the scheduled area. In the unlikely scenario that the cabling becomes defective during the operational life of the Scheme, the cables would be winched out of the conduit from either end of the HDD bore, avoiding any works within the scheduled monument.

7.3.31 The Archaeological Clerk of Works will monitor and oversee the HDD and cable installation works to ensure there is no harm or damage caused to the scheduled monument.

Temporary access across the scheduled monument during construction

7.3.32 A temporary access track is required during the construction phase, which due to access constraints along Moor Road must be provided across the scheduled monument. The precise alignment of the temporary access track

has not yet been determined, but an indicative location is provided on **ES Vol 3 Figure 2-5: Indicative Construction Access and Compounds [EN010141/DR/6.3]**.

7.3.33 The findings of the archaeological geophysical survey (as set out in **ES Vol 2 Appendix 6-5: Archaeological Geophysical Survey Report [EN010141/DR/6.2]**) indicate that the section of the scheduled area in which the temporary access track will be located comprises a roadway with ditches and possible field compartments leading south from the main area of settlement.

7.3.34 The proposed approach below has been considered in line with the principals lain out in Historic England guidance '*Preserving Archaeological Remains'* with particular reference to '*Appendix 5 – The Reburial of Archaeological Sites'* (HE, 2016). The *'Reburial Checklist'* and *'Reburial Threats and Risks'* documents which have been completed and are attached to this document as Appendices C and D.

7.3.35 The temporary access track 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. These mats have very high load capacities of up to 150 tonnes and are designed to spread wheel loads over a broad area. The mats have an anti-slip tread and can be securely connected to each other, ensuring they stay in place under traffic. Whilst the 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.

7.3.36 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.

7.3.37 Heras fencing will be set either side of the temporary access track to ensure vehicles do not stray off track and risk damage to the archaeology. Banksmen or other suitable traffic control measures will be provided at either end of the scheduled monument crossing to ensure vehicles only travel in one direction at a time, as passing places will not be provided within the scheduled area. A speed limit of 10mph will be in place across the scheduled area.

7.3.38 The temporary access track will be inspected weekly during the construction phase by the Principal Contractor and Archaeological Clerk of Works for any shifting mats, rutting, or drainage issues. Early detection of any problems will allow for prompt repair, for example adding more stone to the sub-base, or re-tightening connectors between mats. The mat surface will be kept clean from mud to ensure the anti-slip surface is effective. The drains will be regularly inspected to remove debris or sediment that could limit flow.

7.3.39 On completion of the construction phase the temporary access track will be removed in reverse order, without excavation. The soils below the temporary access track will be inspected and whilst significant compaction is not expected, any issues will be alleviated (e.g. using a deep tine aerator to a depth of up to 200mm). Grassland will be established along the alignment in accordance with the **outline Landscape and Ecological Management Plan [EN010141/DR/7.7]** to re-bind the soils and prevent erosion of the bare topsoil.

7.3.40 An indicative section drawing of the temporary access track is provided on Appendix B of this oAMS.

7.3.41 All works will be monitored by the Archaeological Clerk of Works appointed to the construction phase of the project.

7.4 Operational Phase

7.4.1 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.

7.4.2 At the scheduled monument within East Park Site C there are no proposed engineering works or operations within the scheduled area. The **outline Landscape and Ecological Management Plan [EN010141/DR/7.7]** sets out the proposed grassland creation within the area.

7.4.3 The Applicant has prepared an **outline Heritage Enhancement Management Plan [EN010141/DR/7.16]** as part of the application for development consent, which sets out a series of proposed interventions to further an understanding of the archaeological resource as part of the Scheme. The archaeological investigations proposed as part of the **outline Heritage Enhancement Management Plan [EN010141/DR/7.16]** will be delivered in accordance with WSIs to be agreed with BBHET, CHET and Historic England as appropriate.

7.4.4 Further environmental mitigation measures for the operational phase of the Scheme are also set out in the **outline Operational Environmental Management Plan [EN010141/DR/7.5]**.

7.5 Decommissioning Phase

7.5.1 During the decommissioning phase, the archaeological mitigation measures set out for the construction phase will largely be repeated, albeit the nature of the potential impacts would be substantially less when removing the infrastructure, compared to installing it.

7.5.2 All solar photovoltaic modules, mounting poles, cabling, inverters, transformers, BESS equipment, the East Park substation, and fencing would be removed from the Site and recycled or disposed of in accordance with good practice and market conditions at that time. Any infrastructure that is

more than 1m below ground level, such as cable conduit and casing, would typically be left in situ to reduce the environmental impact of excavation. As set out in Section 7.3, cabling within AACs is likely to be surface-mounted and therefore removed as part of decommissioning. Any buried cabling within AACs would be excavated and removed under the observation of an Archaeological Clerk of Works. Any requirements to retain access tracks will be discussed and agreed with the landowners as part of the decommissioning process.

7.5.3 The landscaping works undertaken across the Site would remain in place, and the land would be handed back to the landowner. It is very likely that tree and hedgerow planting would be retained, however, as the land would be handed back to the landowners on completion of decommissioning the longer-term retention of the landscaping improvement works cannot be guaranteed.

7.5.4 Within the scheduled monument at East Park Site C, it is expected a temporary access track would be provided for the decommissioning phase in line with the methodology and approach set out in Section 7.3 for the construction phase. The buried cabling (at a depth of 10m) would be removed by winching out the cables from either end.

7.5.5 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]**.

8.0 REPORTING, ARCHIVING, AND DATA MANAGEMENT

8.1 Reporting

8.1.1 Upon completion of the fieldwork, a fieldwork report will be prepared within four to twelve weeks, this will be dependent upon the scope and nature of the fieldwork and upon the results of the fieldwork and external specialist reports. This timetable may be extended on those sites with extensive and significant archaeological remains; this will be agreed in advance with BBHET, CHET and HE.

8.1.2 For larger sites, and those with more complicated archaeological remains a staged approached, of process of post-excavation assessment, updated project design and reporting will be followed, with project updates/interims at all stages. Those sites which require deviation from standard reporting preparation procedure, will be identified within a site-specific WSI prior to the start of onsite works.

8.1.3 Each report should include, as a minimum, the following elements (with exact details to be established via provision of a brief for each by BBHET, CHET and HE):

- A Non-Technical Summary;
- Contents list;
- List of Tables, Figures etc.;
- Introduction;
- Summary of project background;
- Description and illustration of the Site location;
- Geology and topography of the Site;
- Archaeological and historical background details for the Site including relevant previous archaeological interventions;
- Statement of objectives and aims;
- Statement of methodology;

- Results and observations based on the quantitative and stratigraphic record with reference to any specific project constraints;
- Discussion of the results in terms of the location, extent, date, nature, condition, quality and significance of any archaeological remains identified during the works;
- Statement of archaeological significance and potential of the Site;
- Assessment of results in terms of the Site-specific aims and wider context;
- Conclusions and recommendations for appropriate further archaeological investigation and mitigation with reference to the specific aims and research agenda;
- Bibliography;
- Trench, context, find, drawing and photographic etc. registers (as applicable); and
- A copy of the OASIS form.

8.1.4 Copies of the draft report will be sent BBHET, CHET and HE for comment; final copies of the report (paper & electronic) will also be submitted to be deposited in the relevant Historic Environment Record (HER).

8.1.5 Any significant variation in the project design, including timetables, proposed after the agreement of the proposals must be acceptable to BBHET, CHET and HE.

8.1.6 An OASIS form will be completed, and a paper copy will be appended to the report. An electronic copy of the post-excavation assessment report will be deposited with the Archaeological Data Service (ADS).

8.2 Deposition

8.2.1 Copies of each of the reports will be deposited with the relevant HER(s) and the project archive(s) deposited with the relevant collecting museum. The specific details of the archive deposition strategy (which will be in accordance with Deposition of Archaeological Archives in Cambridgeshire, CCC 2020)

will be set out within the specific WSIs for each phase of additional works and agreed with BBHET, CHET and HE.

8.3 Publication

8.3.1 Provision should be allowed for the publication of results from the various fieldwork elements (either one, all or a combination of several) in a relevant journal if remains of sufficient importance and/or interest are uncovered.

8.3.2 The specific journal, format and scale of the publication will be agreed in conjunction with the client, BBHET, CHER and HE; although it is expected that these criteria will be proportionate and reflect the importance of the archaeological remains.

8.4 OASIS

8.4.1 An OASIS (online access to the index of archaeological investigation) record (http://oasis.ac.uk) will be created for each instance of archaeological fieldwork, with key fields completed, and a .pdf version of the final report submitted. Subject to any contractual requirements on confidentiality, copies of the OASIS record will be integrated into the relevant local and national records and published through the Archaeology Data Service (ADS) ArchSearch catalogue.

8.4.2 Specific details will be set out within each specific WSI.

9.0 PUBLIC ENGAGEMENT

9.1 Overview

9.1.1 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.

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

9.1.3 It is envisaged that survey works delivered as part of this oAMS would include a limited number of public participation and training events, which could include for 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.

9.1.4 The Applicant has prepared an **outline Heritage Enhancement Management Plan [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.

10.0 IMPLEMENTATION OF ARCHAEOLOGICAL MITIGATION STRATEGY

10.1 Implementation

10.1.1 The archaeological mitigation measures set out in this oAMS will be implemented by a professionally qualified and competent archaeological contractor, appointed by the Applicant or Principal Contractor. The appointed contractor will carry out the mitigation in accordance with this oAMS and any detailed WSIs prepared for specific elements or areas of the Scheme.

10.1.2 The final AMS will define all responsibilities, roles and actions required for implementation of the measures that are set out in this oAMS.

10.1.3 All archaeological investigations and post-excavation reporting and analysis will be undertaken by suitably qualified and experienced archaeological specialists, in accordance with the CIfA Code of Conduct and all appropriate standards and guidance.

10.2 Monitoring

10.2.1 The implementation of the final AMS will be subject to continuous monitoring by the appointed Archaeological Clerk of Works, under the oversight of CHET and BBHET.

10.2.2 Monitoring will ensure that the scope and methods of archaeological fieldwork remain appropriate in response to findings as the works progress. Where archaeological remains are encountered that differ in character, extent, or significance from those anticipated, the contractor will promptly notify either CHET or BBHET accordingly. Following consultation, the strategy may be revised to ensure that an appropriate level of investigation and recording is maintained in accordance with professional standards and regulatory requirements.

10.2.3 Should the monitoring process identify that the agreed final AMS is no longer suitable, the Archaeological Clerk of Works will prepare a revised strategy or variation for review, and agreement will be sought from CHET and BBHET. This will ensure that the approach remains proportionate, effective, and responsive to on-site conditions.

10.2.4 All monitoring activities and outcomes, including any changes to the AMS, will be documented and reported in accordance with the requirements set out in this oAMS and any associated Written Schemes of Investigation (WSIs).

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Figures

Rev	Date	Comment
P01	30/09/2025	DCO Submission

Order Limits

Work No 1 - Solar Generating Station

Work No 7 - Temporary Construction Compounds

Areas of Archaeological Constraint

AAC-A-1
AAC-A-2a
AAC-A-2b
AAC-A-3a
AAC-A-3b
AAC-A-4
AAC-A-5a
AAC-A-5b
AAC-A-6a
AAC-A-6b
AAC-B-1a
AAC-B-1b
AAC-B-2a
AAC-B-2b
AAC-B-3
AAC-B-4
AAC-B-5a
AAC-B-5b
AAC-B-6a
AAC-B-6b
AAC-B-7
AAC-B-8
AAC-B-9
AAC-B-10a
AAC-B-10b
AAC-B-11
AAC-B-12
AAC-B-13
AAC-B-14

WINESHEAD CP
PERTENHALL CP
Pertenhall
Sunny Farm
Tara
Home Farm
Lower Farm
Brook Farm
Fuschia Cottage
Wood End
Horne Farm
Wood End House
Wood End Farm
Chapel Yard
The Old Vicarage
Chadwell End
Chadwell Spring
Kimbolton Road
Moat
Hoo Farm
Hall Farm
Orchard Barn
Manor Farm
Gunnersbury Cottage
Reservoir
Green End
Cottages
Middle Lodge Buildings
Poplar Spinney
Dumpling Lodge
Sowmead Spinney
Pertenhall Brook
Staughton Road
Staughton Moor
New Farm
Willow Spinney
The Grange
Pertenhall Road
Walnut Tree Farm
Brook End
Brook Farm
Brook End Farm
Circus Farm
Valbrook Farm
Keysoe
Temple Farm
Wybridge
The Old Vicarage
Vicarage
Vicarage Farm
Park Farm Bungalow
Earthworks
Hardwick End
Lodge Farm
Green End Farm
Rectory Farm
Home Close
The Bungalow
West End
West End Farm
Little Staughton
Hill Farm
Manor Farm
White House Farm
Brook Farm
London End
River Kym
UA Bdy
FB

0 300 600 900 1,200 1,500 m

EAST PARK ENERGY

0344 8700 007
axis.co.uk
axis

Client
BSSL Cambsbed 1 Ltd

Project
East Park Energy

Drawing Title
Outline Archaeological Mitigation Strategy: Areas of Archaeological Constraint

Scale
1:20,000 @ A3

Status
DCO Submission

APFP Reference
Regulation 5(2)(q)

Submission Reference
EN010141/DR/7.15

Dwg no
Figure 1

Rev
P01

Rev	Date	Comment
P01	30/09/2025	DCO Submission

Order Limits

Work No 1 - Solar Generating Station

Work No 2 - BESS

Work No 3 - East Park Substation

Work No 7 - Temporary Construction Compounds

Areas of Archaeological Constraint

Scheduled Monument

0 300 600 900 1,200 1,500 m

EAST PARK ENERGY

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Client
BSSL Cambsbed 1 Ltd

Project
East Park Energy

Drawing Title
Outline Archaeological Mitigation Strategy: Areas of Archaeological Constraint

Scale
1:20,000 @ A3

Status
DCO Submission

APFP Reference
Regulation 5(2)(q)

Submission Reference
EN010141/DR/7.15

Dwg no
Figure 2

Rev
P01

Rev	Date	Comment
P01	30/09/2025	DCO Submission

Order Limits

Scheduled Monument

N

0 300 600 900 1,200 1,500 m

EAST PARK ENERGY

0344 8700 007
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Client
BSSL Cambsbed 1 Ltd

Project
East Park Energy

Drawing Title
Outline Archaeological Mitigation Strategy: Areas of Archaeological Constraint

Scale
1:20,000 @ A3

Status
DCO Submission

APFP Reference
Regulation 5(2)(q)

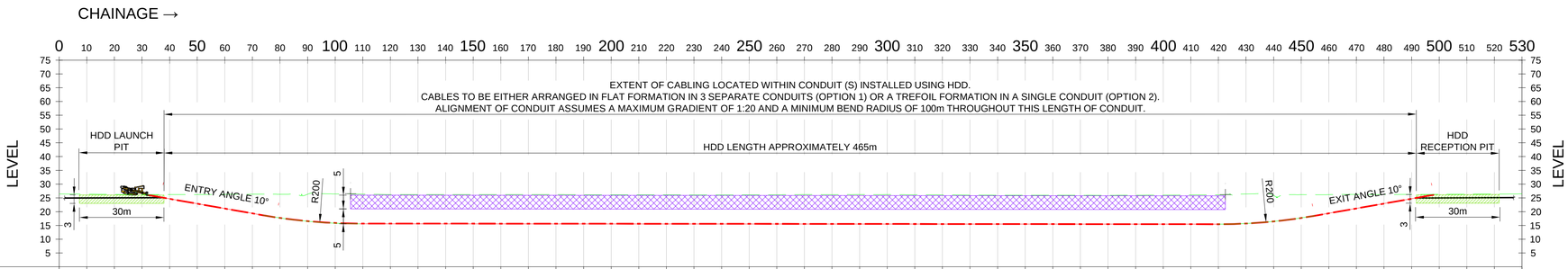
Submission Reference
EN010141/DR/7.15

Dwg no
Figure 3

Rev
P01

Appendix A: Indicative Horizontal Directional Drill Crossing

CABLE ROUTE CENTRELINE - LONGSECTION
SCALE: H 1:1000, V 1:1000 - DATUM: 0.000



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HDD ALIGNMENT LEVEL					24.66	22.90	21.14	19.38	17.71	16.51	15.81	15.61	15.60	15.60	15.59	15.59	15.58	15.58	15.57	15.57	15.56	15.56	15.55	15.55	15.54	15.54	15.53	15.53	15.52	15.52	15.51	15.51	15.50	15.50	15.49	15.49	15.48	15.48	15.47	15.47	15.46	15.46	15.45	15.71	16.47	17.73	19.42	21.18	22.94	24.70				
GROUND LEVEL	26.42	26.35	26.28	26.21	26.20	26.20	26.28	26.33	26.31	26.34	26.42	26.38	26.20	26.21	26.20	26.20	26.23	26.21	26.20	26.14	26.10	26.10	26.10	26.05	26.04	26.09	26.15	26.20	26.17	26.20	26.20	26.15	26.10	26.02	25.98	25.97	25.98	25.94	25.92	25.97	26.00	26.11	26.10	26.43	25.89	26.16	26.18	26.25	26.21	26.27	26.30	26.32	26.40	26.47
CABLE DEPTH					1.536	3.298	5.140	6.951	8.598	9.830	10.612	10.770	10.600	10.618	10.611	10.614	10.647	10.636	10.628	10.569	10.534	10.543	10.548	10.503	10.502	10.553	10.618	10.673	10.648	10.685	10.688	10.646	10.601	10.524	10.490	10.484	10.493	10.463	10.452	10.500	10.537	10.649	10.649	10.723	9.423	8.433	6.760	5.068	3.274	1.569				

NOT FOR CONSTRUCTION

FOR INFORMATION ONLY

AECOM

PROJECT

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CLIENT

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CONSULTANT

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LEGEND

- DRILL ROUTE
- ARCHAEOLOGICAL AREA
- LAUNCH/ RECEIVE PIT (AREA TBC)

NOTES

1. DRAWING IS FOR INDICATIVE PURPOSES ONLY.
2. ALL DIMENSIONS IN METRES UNLESS OTHERWISE STATED.
3. HDD BORE/ ALIGNMENT IS INDICATIVE FOR THE PURPOSES OF THE DCO APPLICATION.
4. HDD CONTRACTOR SHALL BE RESPONSIBLE FOR DETERMINING THE HDD CONSTRUCTION DETAILS, CONDUIT LENGTH (S) AND CONDUIT ALIGNMENT (S) FOR ENSURING ADEQUATE CLEARANCES ARE MAINTAINED TO ALL CONSTRAINTS.
5. SINGLE HDD BORE/ALIGNMENT SHOWN. NUMBER OF BORES REQUIRED SUBJECT TO CABLE DESIGN.
6. LAUNCH/ RECEPTION PIT SUITABLE FOR SINGLE HDD. LARGER AREA WILL BE REQUIRED FOR ANY ADDITIONAL BORES. THIS AREA DOES NOT REPRESENT THE POTENTIAL FINAL CONSTRUCTION COMPOUND REQUIRED.
7. 5M ARCHAEOLOGICAL DEPTH SHOWN BASED ON CLIENT INFORMATION.
8. 5M OFFSET FROM ARCHAEOLOGY SHOWN. FINAL OFFSET WILL BE BASED ON GROUND INVESTIGATION.

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APPROVED FOR ISSUE

A	SL	DL	DL
I/R	DRAWN BY	CHECKED	APPROVED

ISSUE/REVISION

A	30.06.2025	FIRST ISSUE
I/R	DATE	DESCRIPTION

PROJECT NUMBER

60757618

SHEET TITLE

GREAT STAUGHTON
ROMAN SMALL TOWN
HDD PLAN AND SECTION

SHEET NUMBER

60757618-ACM-GEN-EPE-DR-CVL-1001

Last saved by: LAVERYS (2025-06-27) Last Plotted: 2025-06-27 AutoCAD Version: 24.3S (LMS TECH)
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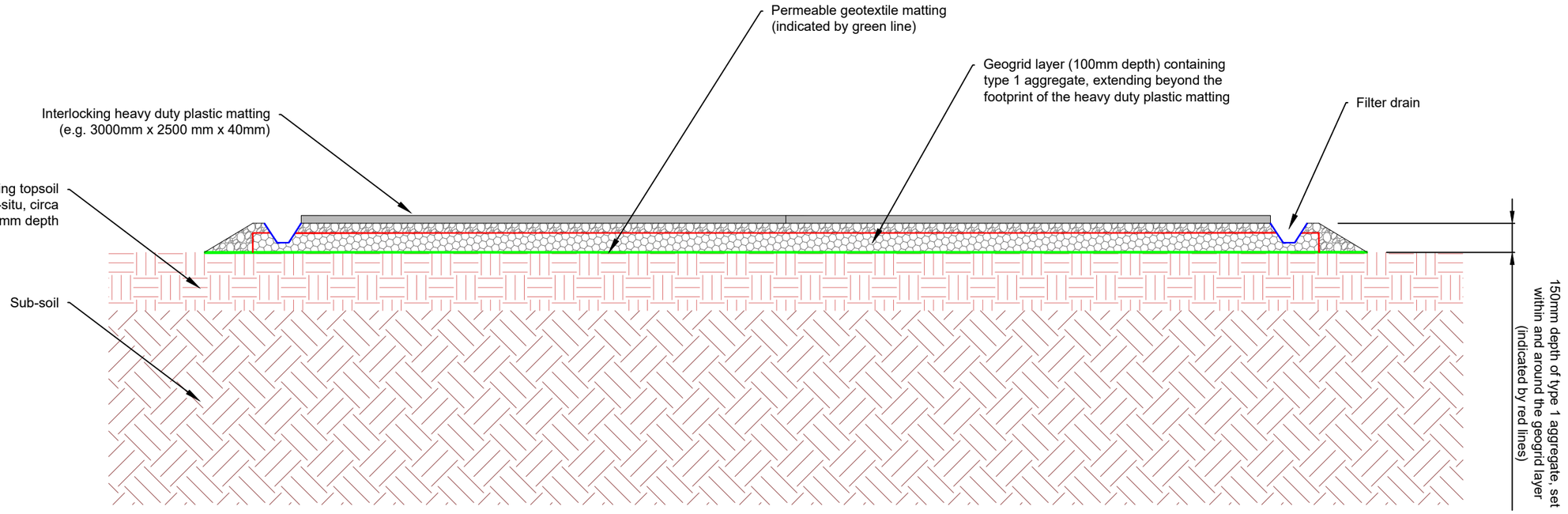
Project Management Initials: Designer: SL Checked: GL Approved: DL

Appendix B: Indicative Temporary Access Track

Rev	Date	Comment
P01	22/09/2025	DCO Submission



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Client
BSSL Cambsbed 1 Ltd

Project
East Park Energy

Drawing Title
Outline Archaeological Mitigation Strategy: Indicative Temporary Access Track

Scale
1:25 @A3

Status
DCO Submission

APFP Reference
Regulation 5(2)(q)

Submission Reference
EN010141/DR/7.15

Dwg no
Figure 1

Rev
P01

Appendix C: Reburial of archaeological sites checklist

Reburial of archaeological sites checklist

Checklist	Tick
Have you identified the objectives of reburial? (Section 1 - oAMS)	X
What are they? Summarise the objectives (for example, why are you reburying and what is the purpose of the reburial process?): A temporary access track is required during the construction phase, which due to access constraints along Moor Road must be provided across a section of the Roman Small Town south of Great Staughton, Scheduled Monument. The objective of the reburying associated with the establishment of the temporary access track is to prevent any direct physical effects (excavation works, wheel rutting etc.) or indirect effects (compaction and changes to hydrology) that could harm the Scheduled Monument.	X
Have you carried out an assessment of significance? (Section 3.1 - oAMS)	X
Is the significance uniform across the site or are there areas that contribute to a greater or lesser degree? Summarise the key aspects of the archaeology that contribute to the significance of the site: The Roman Small Town south of Great Staughton, Scheduled Monument is, by nature of its designation of High significance and this significance is uniform across the entirety of the scheduled area. The key aspects of archaeology that contribute to the high significance of the Site include the following characteristic recorded within its Listing Description: *'Survival: as an extensive and complex series of crop marks which are well defined and, when combined with evidence from excavated test pits, demonstrate the quality and quantity of the deposits;* *Diversity: the site comprises a palimpsest of components including settlement and industrial remains which appear to demonstrate evolution over time, displaying a depth of diversity and chronology;* *Potential: for the extensive deposits, unencumbered by later development, which have the potential to increase understanding of the settlement, its evolution and function from probable pre-Roman origins to Roman occupation and possibly post-abandonment;* *Group Value: for its close proximity to the Roman site at Rushey Farm (NHLE 1006866), interpreted as an Iron Age farmstead, Roman villa and inhumation cemetery;* *Documentation: aerial photographic interpretation, geophysical survey, and limited excavation reports all contribute to our understanding of the monument* *Period: the Roman small town is a strongly representative monument type of the period'* (https://historicengland.org.uk/listing/the-list/list-entry/1491190?section=official-list-entry).	X
Have you carried out a condition assessment? (Section 3.2 - oAMS)	x

Checklist	Tick
What are the main characteristics and vulnerabilities of the site and its proposed reburial materials (archaeological materials, pH and so on)? List any areas/features that require stabilisation prior to reburial: The Scheduled area is currently in arable agriculture use and, therefore, is intermittently crossed by farm vehicles and subject to routine programmes of ploughing. Trial trenching undertaken within the Scheduled Area indicates that the archaeological horizon is encountered directly beneath the topsoil at depths of between 0.3m and 0.4m. It is not anticipated that any areas will require stabilisation prior to reburial. The proposed materials that will be in contact with the ground in the scheduled area are chemically inert and, therefore, will not affect the pH balance of the soil.	X
Have you carried out a threat and risk assessment? (Section 3.3 - oAMS)	X
What are the main risks and how can they be mitigated? As the proposed track material is impermeable there is a potential for water run off causing localised waterlogging or erosion of archaeological remains within the scheduled area. • The Applicant is proposing to provide drains within the temporary sub-base to convey water to nearby ditches, thereby avoiding increased run-off. There is a potential that vehicles straying off the designated track could cause direct impacts upon buried archaeological remains. • Heras fencing will be set either side of the temporary access track to ensure vehicles do not stray off track and risk damage to the archaeology. Banksmen or other suitable traffic control measures will be provided. Vehicles crossing the scheduled monument could directly impacted surface remains and cause compaction of deeper buried remains within the scheduled area. • The temporary access track will be formed of a geotextile layer overlain by 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. 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. These mats have very high load capacities of up to 150 tonnes and are designed to spread wheel loads over a broad area and have an anti-slip tread and can be securely connected to each other, ensuring they stay in place under traffic. The Applicant is proposing these measures to ensure minimum potential compaction or harm to the underlying archaeology. • Banksmen or other suitable traffic control measures will be provided at either end of the scheduled monument crossing to ensure vehicles only travel in one direction at a time, as passing places will not be provided within the scheduled area. A speed limit of 10mph will be in place across the scheduled area.	X
Have you produced a reburial design? (Sections 2 and 5 of the oAMS [EN010141/DR/7.15])	X
What are the main environmental criteria the scheme is designed to control? (Section 2.1 - oAMS)	X

Checklist	Tick
The main environmental criteria the scheme is designed to control are good water movement and erosion (both related to potential increased water run off):	
What are the key functional criteria that the design reflects? (Section 2.2 - oAMS) The key functional criteria that the design reflects are to allows for activity over the reburied feature (plant movement along temporary access track) and to allow for re-excavation (in this instance the removal of the temporary access track).	X
What programmatic criteria have influenced the design? (Section 2.3 - oAMS) The programmatic criteria that influenced the design is to allow for the use of a temporary access track in the short to medium term that will then be removed.	X
Summarise and justify the reburial design (stratigraphy, depth) and materials: Trial trenching undertaken within the Scheduled Area indicates that the archaeological horizon is encountered directly beneath the topsoil at depths of between 0.3m and 0.4m. The temporary access track 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. These mats have very high load capacities of up to 150 tonnes and are designed to spread wheel loads over a broad area. The mats have an anti-slip tread and can be securely connected to each other, ensuring they stay in place under traffic. Whilst the 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.	X
Have you consulted relevant stakeholders (including the landowner/site manager) during the design phase? (Section 5.9 - oAMS)	X
Who are they? Set out the steps you have taken to ensure that all stakeholders (including the landowner) are aware of the reburial scheme and have approved the design: Historic England have been regularly consulted with regard to the Scheme and specific meetings have been undertaken in relation to the mitigation strategy around the Scheduled Monument.	X
Do you have a maintenance and monitoring programme? (Section 5.8 - oAMS)	X
Summarise the main components of the programme here and the measures in place to ensure it will remain successful. Include the responsibilities of specific stakeholders: The temporary access track will be inspected weekly during the construction phase by the Principal Contractor and Archaeological Clerk of Works for any shifting mats, rutting, or drainage issues. Early detection of any problems will allow for prompt repair, for example adding more stone to the sub-	X

Checklist	Tick
base, or re-tightening connectors between mats. The mat surface will be kept clean from mud to ensure the anti-slip surface is effective. The drains will be regularly inspected to remove debris or sediment that could limit flow.	
Will the design documentation be stored so that it is accessible in the future? (Section 5.10 - oAMS)	X
Where will it be stored? How have the responsibilities been passed on from the project manager to the landowner, or from one construction team to another? The design documentation is included within the outline Archaeological Mitigation Strategy (oAMS) document which is being submitted as part of the DCO application and copies will be held by the Principal Contractor and Archaeological Clerk of Works for the duration of the works.	X

Section numbers relate to our guidance on the reburial of archaeological sites, at: https://historicengland.org.uk/images-books/publications/preserving-archaeological-remains/heag100f-appendix5-reburial-archaeological-sites/

Appendix D: Reburial threats and risks

Reburial threats and risks

Threat category	Detail of any potential risk	Impact on significance	Likelihood of impact	Severity of impact	Risk level (*see* risk matrix)	Proposed mitigation measures
Environmental						
Water	Heavy duty plastic mats have an impermeable surface	There is potential for increased run-off either side of the track that could cause localised water logging that could affect the condition of buried remains.	Likely (without proposed mitigation) Unlikely (with proposed mitigation)	Negligible	Low	The Applicant is proposing to provide drains within the temporary sub-base to convey water to nearby ditches, thereby avoiding increased run-off and waterlogging of archaeological remains.
Vegetation	N/A	N/A	N/A	N/A		N/A
Livestock / burrowing animals	N/A	N/A	N/A	N/A		N/A
Erosion	Heavy duty plastic mats have an impermeable surface	There is potential for increased run-off either side of the track that could cause erosion of deposits which contain buried remains.	Likely (without proposed mitigation) Unlikely (with proposed mitigation)	Negligible	Low	The Applicant is proposing to provide drains within the temporary sub-base to convey water to nearby ditches, thereby avoiding increased run-off and erosion of

Threat category	Detail of any potential risk	Impact on significance	Likelihood of impact	Severity of impact	Risk level (*see* risk matrix)	Proposed mitigation measures
						archaeology either side of the temporary access track.
External human						
Theft	N/A	N/A	N/A	N/A	N/A	N/A
Vandalism	N/A	N/A	N/A	N/A	N/A	N/A
Accidental damage	Vehicular use of temporary haul road.	Risk of compaction of buried remains within the scheduled area. Vehicles straying off track could cause direct impacts upon buried archaeological remains.	Likely (without proposed mitigation) Unlikely (with proposed mitigation)	Minor	Low-med	Proposed temporary track construction designed to minimise potential compaction or harm to the underlying archaeology Heras fencing will be set either side of the temporary access track to ensure vehicles do not stray off track.
Project management	N/A	N/A	N/A	N/A	N/A	N/A
Construction design changes	N/A	N/A	N/A	N/A	N/A	N/A

Threat category	Detail of any potential risk	Impact on significance	Likelihood of impact	Severity of impact	Risk level (*see* risk matrix)	Proposed mitigation measures
Accidental damage	N/A	N/A	N/A	N/A	N/A	N/A
Timescale challenges	N/A	N/A	N/A	N/A	N/A	N/A
Permission withdrawn	N/A	N/A	N/A	N/A	N/A	N/A
Financial	N/A	N/A	N/A	N/A	N/A	N/A
Lack of funding	N/A	N/A	N/A	N/A	N/A	N/A
Further seasons unfunded	N/A	N/A	N/A	N/A	N/A	N/A
No monitoring funds	N/A	N/A	N/A	N/A	N/A	N/A
Legal	N/A	N/A	N/A	N/A	N/A	N/A
Legal consequences	N/A	N/A	N/A	N/A	N/A	N/A
Materials	N/A	N/A	N/A	N/A	N/A	N/A
Materials unavailable	N/A	N/A	N/A	N/A	N/A	N/A
Substandard / inappropriate materials	N/A	N/A	N/A	N/A	N/A	N/A
Monitoring	N/A	N/A	N/A	N/A	N/A	N/A
Monitoring personnel leave	N/A	N/A	N/A	N/A	N/A	N/A

Threat category	Detail of any potential risk	Impact on significance	Likelihood of impact	Severity of impact	Risk level (*see* risk matrix)	Proposed mitigation measures
Damaged equipment	N/A	N/A	N/A	N/A	N/A	N/A