



**PLANNING ACT 2008 (AS AMENDED) – SECTION 88 AND THE
INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES 2010 (AS
AMENDED) – RULE 8**

**APPLICATION BY BSSL CAMSBED 1 LTD FOR AN ORDER GRANTING
DEVELOPMENT CONSENT FOR THE EAST PARK ENERGY PROJECT**

APPLICATION REF: EN010141

SUBMISSION DEADLINE: 7th April 2026

**WRITTEN REPRESENTATION OF THE HISTORIC BUILDINGS AND MONUMENTS
COMMISSION FOR ENGLAND (HISTORIC ENGLAND)**

REGISTRATION ID: [REDACTED]

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Summary

Historic England does not object in principle to the Proposed Development. We have however raised some concerns with the application that we feel would benefit from further scrutiny. These are set out below.

We have concluded that a range of designated and non-designated heritage assets would be negatively impacted by the development. A direct, permanent and harmful change could potentially be a significant effect in some cases. Separately, we recognise that the scheme has also potential to deliver heritage focused public benefits in relation to 'Roman Small Town south of Great Staughton'. These impacts will need to be weighed in the balance in relation to the decision making.

We have provided a supporting narrative in relation to selected assets following our own assessment of the proposal. We have noted the areas where conclusions of our assessment differ from that presented in the Environmental Statement. These areas concern setting impacts on the grade I listed Church of All Saints, and scheduled monument 'Two bowl barrows 900m and 1000m east of Old Manor Farm'. In these two cases we have identified a higher residual level of harm than this assessed by the applicant.

We are broadly content with the overall approach to the heritage assessments and the proposed mitigation presented in the Environmental Statement. However, we note that some final reports for heritage evaluation are outstanding and certain areas within the draft Order Limit still require further evaluation. Therefore, further analysis is required to establish significance of certain assets and to devise an appropriate programme of mitigation for non-designated heritage assets. We recognise that some of this work might be undertaken post-consent but before commencement of the development. In our view this represents a project risk.

We have also made some comments and recommendations, for example in relation to the wording of the DCO, the Commitments Register, Outline Construction Environmental Management Plan, Outline Archaeological Mitigation Strategy, and Outline Decommissioning Environmental Management Plan. We feel this would help provide more clarity and help to secure appropriate mitigation in the event that the DCO is granted. We recommend these changes are implemented before the end of the examination.

1. Introduction

- 1.1 The Historic Buildings and Monuments Commission for England (HBMCE), known as Historic England, is the Government's adviser on all aspects of the historic environment in England. It is our duty under the National Heritage Act 1983 to secure the preservation and enhancement of the historic environment including historic buildings and areas, archaeology and historic landscape with a duty to promote public understanding and enjoyment. This extends to sites and places in, on, or under the seabed within the seaward limits of the UK Territorial Sea adjacent to England.
- 1.2 Historic England is an executive Non-Departmental Public body sponsored by the Department for Culture, Media and Sport (DCMS) and we answer to Parliament through the Secretary of State DCMS. Our objective is to ensure that the historic environment generally, and marine and designated heritage assets especially, are fully considered in the determination of this DCO.
- 1.3 The National Heritage Act (2002) gave Historic England responsibility for identifying sites for designation within the English area of the UK Territorial Sea (i.e. English Inshore Marine Planning Area). We also provide our advice in reference to how the historic environment is included within marine planning and licensing provisions within the Marine and Coastal Access Act 2009.
- 1.4 We have provided substantive pre-application advice about the scope of environmental assessment and the Preliminary Environmental Information Report. We have also submitted a Relevant Representation (dated 14th January 2026). The applicant has provided an Environmental Statement (ES) with supporting appendices and other documentation with the application. We have therefore considered this information, and we hereby provide detailed comments, expanding on the matters highlighted in our Relevant Representation.
- 1.5 This Written Representation sets out the views of Historic England on the proposed Development Consent Order (DCO) application made by BSSL Cambsbed 1 Ltd for the proposed East Park Energy project.
- 1.6 The project comprises of a new ground-mounted solar photovoltaic energy generating station, split between four sites (A-D), and the associated infrastructure on land to the north-west of St Neots. The Scheme also includes an associated on-site Battery Energy Storage System (BESS), a new substation, and 400kV electric cable connection to the national grid at the Eaton Socon National Grid Substation. The scheme is located across two administrative areas: Bedford Borough Council and Huntingdonshire District Council.
- 1.7 The submitted application includes an Environmental Statement, dated September 2025, produced to satisfy the requirements of Environmental Impact Assessment (EIA) requirements, under the terms of European Union Directive 2011/92/EU (as amended by Directive 2014/52/EU) on the assessment of the effects of certain public and private projects on the environment (EIA Directive). The EIA Directive is transposed into English law for Nationally Significant Infrastructure Projects (NSIPs) by The Infrastructure Planning (EIA) Regulations 2017.

- 1.8 As set out in our Section 56 Relevant Representation we note that the project is located in a highly sensitive area for the historic environment. The red line boundary includes extensive area of Roman activity interpreted as remains of a small Roman town which has recently been designated as a scheduled monument. In addition to the presence of these designated remains the proposed development site contains a range of non-designated heritage assets with archaeological interest, some of which would experience direct impact as a result of the project. Separately, the proposed development would be within the setting of a range of high value and designated heritage receptors, such as listed buildings, conservation areas, and scheduled monuments.
- 1.9 The proposed development has the potential to impact the historic environment, and this impact could be significant in relation to some of the heritage receptors and in relation to EIA policy.
- 1.10 We confirm the Environmental Statement (ES) is broadly adequate for the purposes of the examination. The baseline and assessment are set out in the accompanying ES chapters. It was agreed during the scoping process that detailed assessment of the impact of the proposal upon the historic environment would be required, and this is provided here.
- 1.11 The Environmental Statement (ES) Chapter 6 (Cultural Heritage) summarises the assessment of the significance of the designated heritage assets and their setting as well as the impact on their significance. We broadly accept the findings but wish to comment in detail on the assets we identified at the PIER stage plus some additional ones within our remit on which the applicant has commented in the ES. We will specifically highlight these assets where conclusions of our assessment differ from those presented in the ES.
- 1.12 We have not provided advice on grade II listed buildings, non-designated buildings, and the majority of the non-designated archaeology. We would defer to the LPA heritage, landscape, conservation and archaeological advisers in this regard.
- 1.13 We are pleased to see the inclusion of an Outline Archaeological Mitigation Strategy and Outline Heritage Enhancement Strategy in this DCO application. These documents contain provisions to produce a post-consent WSI and detailed mitigation and enhancement plans post-consent. We have provided comments on the proposed measures and suggested revisions where appropriate. We would expect that outline strategies will be agreed and amended with Historic England prior to being adopted.
- 1.14 We are also recommending that wording of the draft DCO requirement is revised before the end of the examination. The revised requirement should include additional provision for a Historic England's involvement in approval of the mitigation and enhancement measures. The Examination Authority will also need to be satisfied that the requirements are sufficient to mitigate the negative impacts of the proposal on the historic environment.

2 Designated Heritage Assets: Listed Buildings, Conservation Areas and Scheduled Monuments

General Comments

- 2.1 The information relevant to historic environment assessment is found primarily in the following documents:
- Environmental Statement - Vol 2 Appendix 6-2 Desk Based Assessment P01 [APP-081]
 - Environmental Statement - Vol 1 Chapter 6 Cultural Heritage and Archaeology P01 [APP-082]
 - Environmental Statement - Vol 2 Appendix 6-4 Settings Impact Assessment P01 [APP-083]
 - Environmental Statement - Vol 3 Chapter 5 Landscape and Visual Figures parts1-14 [APP-129 to APP-142]
- 2.2 Heritage sensitivity of the area where the Project would be located is acknowledged in the Environmental Statement (ES) which also confirms the proposal will impact upon a wide range of heritage receptors both designated and undesignated. The baseline and assessment are clearly set out in the Desk Based Assessment and Cultural Heritage and Archaeology chapter of the ES. The ES also identifies likely significant effects.
- 2.3 In the majority of cases the impacts on designated heritage assets would be through changes to their setting. The development would introduce a significant number of solar arrays and associated infrastructure into the predominantly rural landscape of the broad valley of River Kym and its tributaries. Because of the size of the development this would lead to fundamental change of the character of the area.
- 2.4 In case of the scheduled monument – ‘Roman Small Town south of Great Staughton’, which is located within the boundaries of the draft Order Limit, there is potential for direct impact in addition to change to the setting. In this case however, there is also potential for the delivery of significant, heritage focused, public benefit.
- 2.5 We will not be providing comment on grade II listed buildings and non-designated archaeological remains. We are content to defer to the relevant local planning authorities and their conservation and archaeological advisers on this matter, and we refer the Examining Authority to their submissions as relevant.
- 2.6 The following advice is presented in order the sites are located from east to west. We have only provided text on a selection of assets where we feel comment would add value to the examination and/or where we have specific issues of concern or recommendations.

Church St Mary The Virgin (NHLE 1114778, listed grade I)

- 2.7 St Mary's is medieval parish church in Keysoe dating from the late C12th-C15th built in coursed limestone rubble with ashlar dressings, described by Pevsner as being "*very much in the Huntingdonshire style*" and incorporates features of both the Decorated and Perpendicular Gothic. Its recessed octagonal spire makes it a prominent landmark building which is readily visible and recognisable in views from the surrounding roads and fields.
- 2.8 Part of significance of the church lies in its setting which is mostly undeveloped open countryside and land in agricultural use. The church is a prominent focal point in views to the roads and fields to the north, and there are also long views out from the churchyard across the open countryside. The rural setting therefore enhances the way in which the building is experienced and appreciated.
- 2.9 The proposed development site lies to the north-east of the church and within its setting. Although the church is generally well-contained within a churchyard surrounded by mature vegetation (as illustrated by viewpoint 29) there is some intervisibility between the two. The spire is particularly prominent.
- 2.10 We consider that some south westerly views towards the church are likely to be affected by the presence of the solar farm to some degree (as illustrated by viewpoint 33). The long views from the eastern extreme of the churchyard will also be impacted. We consider that the change to the wider setting of the grade I listed church would erode its historic rural setting and would therefore affects its significance to a minor degree.

Church of All Saints (NHLE 1114812, listed grade I)

- 2.11 The medieval parish church in Little Staughton is largely C15th with some C13th and C14th fabric and early C20th work. It is built of coursed limestone with ashlar dressings. Its octagonal spire makes it particularly eye-catching and this in combination with its elevated position up on the ridge make it stand out as a distinctive key building within the rural landscape.
- 2.12 Part of significance of the church lies in its setting which is mostly undeveloped open countryside and land in agricultural use. The church is a prominent focal point in views the roads and fields to the north, and there are views out from the north side of the churchyard across the open countryside. The rural setting therefore enhances the way in which the building is experienced and appreciated and speaks to its significance as a rural parish church - a key building within the historic settlement.
- 2.13 The development site lies to the north of the church and within its setting. There is good intervisibility between the two. Viewpoints 51-53 provides some indication of the visual effect of the church in context with the solar farm to the north, which will likely affect views from: the northern side of the churchyard, western and eastern approaches to the church, and from the north (on Great Staughton Road and the public right of way beside the farm) towards the church and ridgeline.

- 2.14 We note that hedging is proposed to screen the solar farm and whilst we accept that this may help to mitigate negative visual impacts to some extent, we remain sceptical that it will be effective in the case of All Saints Church, due to its elevated position.
- 2.15 The solar farm would sprawl across the open fields and read as an alien feature that would detract from the experience and appreciation of the church in its historic rural context. We consider that the presence of the solar farm within the setting of the grade I listed building would cause degree of harm to its significance which would be moderate within less than substantial harm. In EIA terms the effect would be moderate.

**‘The Old Manor House, Cretingsbury: a motte castle and moated manor house’
(NHLE 1009590, scheduled monument)**

- 2.16 The site at the Old Manor House consists of a well-preserved earthwork of a motte castle and a manorial moat. Both classes of monument belong to a medieval period. The monument represents a relatively rare example of incorporation of an earlier castle earthwork into a later moated site indication long continuity of use. In this particular case the moat is of a particularly complex form displaying a wide diversity of features.
- 2.17 The monument is positioned on a ridge overlooking the valleys of River Kym to the north and a small brook to the south. Its elevated position, which affords long views over predominantly agricultural land contributes positively to our understanding of the character of the site and its function.
- 2.18 We note the applicant has considered the impact of the development on this scheduled monument and identified that there will be adverse effects on the significance of the heritage asset resulting from changes within its setting. The magnitude of the effect in EIA terms was described as temporary moderate adverse effect during construction, and a permanent minor adverse effect in operational phase. We would agree with the applicant’s conclusion in this case. We consider that due to the distance and the partial screening, the harm would be at the lower end of less than substantial harm in NPPF terms.

Great Staughton Conservation Area

- 2.19 The Great Staughton Conservation Area comprises the area to the north and south of The Highway. It encompasses predominantly residential properties but also includes the church, public houses and farm buildings reflecting Great Staughton’s heritage as a coaching location. The rich and varied set of buildings include the church of St Andrew (listed grade I) and Place House -a Tudor mansion house listed grade II*. Various grade II listed buildings are also present.
- 2.20 There are long southerly and south-easterly views out from the edges of the conservation area across the open agricultural landscape which are characteristic of its essential setting and speak to its significance as small historic settlement set within a wider agricultural hinterland.

- 2.21 We agree with the applicant's assessment that much of the conservation area and the listed buildings within it are unlikely to be affected in terms of their setting. There are however some long views out from the parts of the conservation area including the from south-eastern corner of the churchyard and glimpsed views south and east from the southern end of the Town towards the solar farm which would lie within a kilometre of the conservation area boundary. We consider that the experience of the conservation area would be negatively affected to some degree due to the visual impacts we have described above.

Two bowl barrows 900m and 1000m east of Old Manor Farm (NHLE 1020486, scheduled monument)

- 2.22 The monument includes two mounds which were interpreted as prehistoric bowl barrows. Both are represented by slight earthworks much reduced in height by past ploughing. The barrows are positioned on a ridge overlooking the valleys of River Kym to the north and a small brook to the south. There is cartographic evidence that additional barrows were also present in this area, however they are no longer extant.
- 2.23 The barrows are a class of funerary monument which was mainly constructed in the Bronze Age. However, the site to the east of Old Manor Farm have not been excavated so far and the dating remains unconfirmed. Roman period barrows are known from several sites in Cambridgeshire, and it cannot be ruled out that the site had some association with Roman town located in short distance to the north. Even if we assume that the barrows pre-date the roman activity, they must have still been prominent markers in the landscape at that time.
- 2.24 The setting of the barrows is defined by open fields stretching from the crest of the ridge down to the bottom of the river valley, with only a couple of small blocks of woodland. The openness of the landscape contributes positively to the understanding, and consequently to the significance of this heritage asset.
- 2.25 The applicant has considered the significance of the monument in the Cultural Heritage chapter of the Environmental Statement (ES), including contribution made by its setting. We note that the setting assessment also looked into inter-relationship of the barrows and the Roman town. The ES concluded that the magnitude of the effect in EIA terms would be minor for the construction and operational phases of the project. We believe this assessment slightly underplays the severity of the impact.
- 2.26 We welcome commitment to provision of a buffer to the north of the barrows and positioning of the solar panels on a lower ground. This is correct measure to minimise visual impacts in this case. However, as described in the Environmental Statement - Vol 2 Appendix 5-4 Effects at Viewpoints [APP-072], viewpoint 57, the solar arrays would still be evident at close distance. We consider that the presence of the solar farm within the setting of the barrows would cause degree of harm to their significance which would be moderate within less than substantial harm (in terms of NPPF). In EIA terms the effect would be moderate adverse.

Roman Small Town south of Great Staughton (NHLE 1491190, scheduled monument)

- 2.27 The monument comprises extensive area of Roman activity represented by series of complex cropmarks located immediately to the south of River Kym. The site has been interpreted as buried remains of a small Roman town.
- 2.28 While the presence of archaeological remains in the area has been known for some time, the full significance and complexity of the site has been only identified during early archaeological investigations associated with the project. Recognising the national significance of the site, the applicant applied to include this site on the National Heritage List for England. Subsequently the site was designated as a scheduled monument in September 2024.
- 2.29 The settlement appears to focus on a central open area with numerous double ditched trackways radiating from the open space. The trackways lead in various directions linking with other tracks to form a network of roads. Between the roads, multiple enclosures organised in a structured manner, demonstrate organisation and spatial order to the settlement plan. Linear stretches of settlement are clearly visible along the roads leading away from the central part of the town. Industrial and quarrying areas are thought to be present on the edges of the settlement.
- 2.30 The setting of the monument is defined by its location within the River Kym valley. The relationship with the river, relative openness of the predominantly agricultural landscape punctuated by small blocks of woodland, and views towards the ridge defining the valley all contribute positively to the site's significance.
- 2.31 The applicant has considered the significance of the monument in the Cultural Heritage chapter of the Environmental Statement (ES), including contribution made by its setting. We are aware that the scheme was modified to avoid direct impacts on buried archaeology in the designated area and to minimise the impact on the setting by maintaining visual connectivity with the ridge to the south and provision of a vegetation screening. We welcome these measures to mitigate impact by design and consider that they are appropriate in this case.
- 2.32 Despite embedded mitigation measures the scheme will still result in a change to the setting of the designated heritage asset. Presence of the solar arrays will alter the character of the area directly to the south of the Roman town. While the proposed vegetation buffer will partially screen direct views, it will also reduce the openness of the landscape.
- 2.33 The Cultural Chapter of the Environmental Statement (Vol 2 Appendix 6-4 Settings Impact Assessment [APP-083] concluded that the magnitude of the effect in EIA terms would be moderate for the construction and minor for the operational phase of the project. We broadly agree with this conclusion and consider that the implementation of the Project would cause degree of harm to the monument's significance. The level of harm would be within less than substantial range in NPPF terms - moderate during construction, and low to moderate afterwards.

- 2.34 We are satisfied that the proposed mitigation measures are adequate to prevent direct impacts on the significance of the scheduled monument during construction and operation phases of the Project. We have provided additional comments (in section 3) on the methodology of the decommissioning phase aimed at prevention of the unforeseen adverse impacts.
- 2.35 We welcome the proposed enhancement measures outlined in the application (Outline Heritage Enhancement Strategy [APP-167]) which would be beneficial for the conservation and long-term preservation of the monument. The measures would also improve public enjoyment and understanding of this nationally significant archaeological site. The measures include taking the area of the monument out of cultivation (and maintaining it under grass), enabling public access through creation of circular footpath, provision of on-site interpretation, commitment to funding further archaeological research. Among these measures, the permanent change to agricultural practice is of particular importance, as it would arrest gradual erosion caused by repeated ploughing of the fields. It would also protect the site to a certain extent from illegal metal detecting in the future. We consider that the measures proposed would deliver considerable heritage focused public benefit and enhance the significance of the heritage asset. This should be taken into account in the decision-making process as recommended by section 5.9.25 of the National Policy Statement for Energy (EN-1), 2024.

Roman site, Rushey Farm (NHLE 1006866, scheduled monument)

- 2.36 The monument mainly comprises buried remains of two buildings, interpreted as being part of a Roman villa. The buildings were excavated in the 1950s. The excavations have shown that the site likely includes an Iron Age farmstead, Roman villa and inhumation cemetery.
- 2.37 The Rushey Farm site is located short distance to the south of the main area of Roman activity centred on the 'Roman Town south of Great Staughton'. It is likely that the villa was located along one of the roads radiating from the town and that there is a close association between the two sites.
- 2.38 The setting of monument is defined by the predominantly arable fields, open landscape, and intervisibility with the Roman town located on a slightly lower ground in River Kym valley. All of these elements contribute positively to the experience of the site and its significance.
- 2.39 We note the applicant has considered the impact of the development on this scheduled monument and identified that there will be adverse effects on the significance of the heritage asset resulting from changes within its setting. The magnitude of the effect in EIA terms was described as minor adverse effect in construction and operational phases. We would agree with the applicant's conclusion in this case. We consider that due to the distance, partial screening and retention of the main lines of view to the north the harm would be at the lower end of less than substantial harm in NPPF terms.

3 Environmental Statement Comments by Chapter

Volume 1 – Main Report Chapter 2: The Scheme [APP-038]

- 3.1 It is noted that some elements of the proposed scheme will have a below ground impact, such as the cable trenches, the BESS, the inverters, transformers, the cable jointing chambers, the internal cabling, the substation, permanent access tracks, drainage features, and drainage basins. These elements could therefore impact any buried archaeological remains that may be present within the proposed Project area.
- 3.2 We note that a below ground cable corridor for 33kv and 400 kV connections will be installed either through open cut trench, horizontal drilling or through the use of horizontal direction drilling (HDD) (Table 2-17 & Table 2-20). If drilling techniques are to be used, the potential issues associated with bentonite slurry outbreak will need to be considered in terms of the impact (both direct and indirect) that this may have on any buried archaeological remains.
- 3.3 Paragraph 2.5.39 states that the Areas of Archaeological Constraint have been identified in the outline Archaeological Mitigation Strategy. We welcome this approach; however, we would like to highlight that the list of these constraint areas will need to be updated following additional surveys undertaken post-consent.
- 3.4 We welcome that the applicant made special provisions for works in the 'Areas of Archaeological Constraint' (works in paragraphs 2.4.18, 2.5.39-41) to achieve preservation of archaeology in situ or secure further archaeological investigation. We note that the Environmental Statement only contains general information regarding the works and the details of the permitted works in these areas are set out separately in the outline Archaeological Mitigation Strategy.
- 3.5 Historic England can confirm that we have previously expressed concerns about the heritage impact of the originally considered location of BESS and Project Substation within site C. We welcome the decision to move the location of these elements of the Project to site D as outlined in paragraphs 2.4.43 and 2.4.78.
- 3.6 We note that due to construction requirements the areas for BESS and Substation cannot be designated for preservation in situ of archaeological remains (paragraphs 2.4.73, 2.4.90).
- 3.7 We note that for Work No. 4 (200kv connection from East Park Substation to Eaton Socon Substation) Horizontal Directional Drilling) is identified as a method of construction in areas of archaeological constraint (paragraph 2.4.96). We welcome inclusion of this commitment, as it gives the project flexibility to address impacts on currently unknown archaeological remains. A mechanism for agreeing locations where horizontal directional drilling would be utilised for archaeological reasons should be specified in the application to allow for input from the Local Authorities and Historic England.
- 3.8 We note that the area of scheduled monument 'Roman Small Town south of Great Staughton' is covered by Work Nos. 6 and 8. These are works for internal cabling

and ancillary infrastructure (No. 6); and works to create, enhance and maintain green infrastructure (No. 8). A number of provisions contained within these works' packages would be inappropriate within scheduled area (such as tree planting, creation of swales, etc.) and the proposals for the designated area are detailed separately in the Outline Landscape and Ecological Management Plan [APP-159], Outline Archaeological Mitigation Strategy [APP-166], and Outline Heritage Enhancement Strategy [APP-167]. These must be clearly cross-referenced to avoid any confusion and unintentional harm to the significance of the designated heritage asset.

- 3.9 We understand that in the area of the scheduled monument the consent would be granted only for the following works: construction, use and removal of temporary access track; construction, maintenance and removal of the 33kv electric cable (installed through HDD method); creation of wildflower meadow, creation of permissive footpath, and installation of on-site interpretation.
- 3.10 We recognise that it might not be practical or necessary to define a completely separate works package for the scheduled monument area. However, as the application seeks to obtain consent for the works which would normally require Scheduled Monument Consent (under provisions of 1979 Ancient Monuments and Archaeological Areas Act), we recommend that all works proposed within the boundaries of the scheduled monument should be clearly identified by the applicant in one document for the sake of clarity and to avoid misunderstandings in the future. The list of permitted works could be provided within one of the outline strategies which are certified in the DCO.
- 3.11 We note references to the design of temporary access track in paragraph 2.4.132. We would like to highlight that these designs do not apply to the temporary access track within the boundaries of the scheduled monument. A separate design for this area has been agreed, and details are specified in an outline Archaeological Mitigation Strategy document [APP-166]. We would recommend that this commitment to a different design is appropriately cross-referenced for the avoidance of the doubt.
- 3.12 We welcome the commitment to consultation with Historic England over measures contained in CEMP (paragraph 2.5.31).
- 3.13 We note that intrusive archaeological works are listed as preliminary works which are to be undertaken before commencement of various phases of the construction of the scheme (paragraph 2.5.5). This is correct approach and we support this sequence of activities.
- 3.14 However, we note that some activities relevant to the scheduled monument - 'Roman Small Town south of Great Staughton', are not listed among primary stages of construction (as outlined in paragraph 2.5.4). Specifically, the timings of removal of temporary access track constructed across the monument and implementation of enhancement measures (taking the site out of cultivation) are not mentioned. These activities and expected timeframe of their implementation should be added to the construction programme for clarity and transparency.

- 3.15 We consider that in the area of the scheduled monument – Roman town at Great Staughton, an appropriate security plan should include coverage of parts of the archaeological site by CCTV installed along the perimeter fence surrounding the solar arrays. This measure is an opportunity to improve the site's security and prevent crime.

Volume 1 – Main Report Chapter 6: Cultural Heritage and Archaeology [APP-042]

- 3.16 We note the applicant has provided details of the policy context and relevant guidance and summary of engagement, which includes Historic England. We can confirm we have been party to extensive pre-application discussion with regards to the scheme and we provided advice at the scoping and PEIR stages and throughout the pre-examination period.
- 3.17 We note that a study area of 3 km radius together with a review of ZTV has been used to identify core baseline conditions for assessment of setting impacts on heritage assets (paragraph 6.4.3). We are satisfied that this is an appropriate assessment methodology and that all designated heritage assets which would experience negative effects have been correctly identified.
- 3.18 Historic England notes that certain areas of the draft Order Limits have not been accessible for geophysical survey prior to the submission of the DCO. These areas consist of one field within field B. We welcome applicant's commitment to undertake the survey as part of 'Site Preparation Works' (paragraph 6.5.5).
- 3.19 Historic England notes that certain areas of the draft Order Limits have not been accessible for archaeological trial trench evaluation prior to the submission of the DCO. This includes the cable corridors between East Park Site B to C, from East Park Site C to D, the grid connection route, two fields within Site B and one field within Site D. We welcome the commitment by the applicant to carry out a second phase of trial trench evaluation following the granting of the DCO, in these areas (paragraph 6.5.6). The evaluation work should be undertaken as part of 'Site Preparation Works'.
- 3.20 As certain areas of the draft Order Limits have not been fully evaluated, there is still a possibility that previously unknown archaeological remains of high significance will be discovered. Any harm to such remains would need to be appropriately mitigated. This is a risk for the Project and the DCO needs to ensure there is a secure mechanism and process for dealing with and managing unexpected and high value archaeological discoveries through the draft AMS & WSI documents secured by the DCO requirement.
- 3.21 Section 6.7 outlines the Embedded Mitigation and Enhancement Measures, which includes the implementation of design principles. We are pleased to see that known and unknown archaeology will be protected through archaeological investigation and mitigation (Principle 3.2, Section 6.7.4).
- 3.22 The Illustrative Environmental Masterplan outlines the proposed planting strategy. It should be noted that the type of plants selected needs to be carefully considered in terms of the impacts that the root systems may have on buried archaeological

remains. For example, the report prepared by Oxford Archaeology (Assessing the Impact of Tree Roots on Archaeology) highlights the impact that the root structures of different types of trees could have on buried archaeological remains (see <https://knowledge.oxfordarchaeology.com/library/12564>).

- 3.23 Paragraph 6.7.16 states that no-dig solutions have been proposed for 29 out of 42 identified Areas of Archaeological Constraints (AACs). We welcome this approach to mitigation by design.
- 3.24 We welcome commitment to revision of the identified Areas of Archaeological Constraint in agreement with relevant stakeholders, when final results of all surveys and all phases of trial trench evaluation are available (paragraphs 6.7.17 and 6.9.8). Historic England supports this approach.
- 3.25 The OCEMP includes commitments in relation to working around archaeological remains. We specifically note the commitments applicable to works within the scheduled monument – ‘Roman small town to the south of Great Staughton’ (Paragraph, 6.7.23-24). The measures include demarcation of the monument, exclusion of construction of activities with exception of HDD and construction of temporary access track, use specific methodology for HDD and construction of temporary access track. We support these commitments as they are necessary to prevent adverse impacts on the significance of the designated heritage asset.
- 3.26 We note that the potential issues associated with a risk of bentonite slurry outbreak during HDD work beneath the scheduled Roman town have been considered in outline Archaeological Mitigation Strategy and Outline Construction Environmental Management Plan. We can confirm that the outlined control measures are appropriate in this case.
- 3.27 It is stated in Table 6.11 and Section 6.8.21 that the predicted direct effects within the Site B to Site C corridor are not significant in EIA terms. These conclusions are based on the evaluation work done to date, but it is noted that evaluation excavations have not been carried out (Section 6.8.22). We are pleased to see that the assessment of direct impacts will be revised following the completion of the Trial Trenching. The same comments apply for the Site C to Site D corridor (Section 6.8.32).
- 3.28 It is noted that additional mitigation and monitoring will be required for areas that have not been accessible for geophysical survey prior to the submission of the DCO (Section 6.9.1). Geophysical surveys will be carried out, and where required, programmes of trial trench evaluation will be completed. This approach is sensible, as it will fill in the gaps in our understanding. If previously unknown archaeological remains are uncovered during this additional phase of evaluation, then an appropriate mitigation strategy would need to be implemented in consultation with (and with agreement of) the relevant stakeholders.

**Volume 1 – Main Report Chapter 17: Cumulative and In-Combination Effects
[APP- 053]**

3.29 Historic England considers that methodology of the assessment is adequate. We can confirm that the conclusions of the Applicant's assessment of cumulative effects, as set out at Table 17.5, are appropriate for the purposes of the DCO examination.

**Vol 2 – Technical Appendices Appendix 6-4: Settings Impact Assessment
[APP- 083]**

3.30 We can confirm that we were consulted by the applicant on the scope of the setting assessment and the methodology used for this assessment. We support the approach taken by the applicant.

3.31 We note that a study area of 3 km radius together with a review of ZTV has been used to identify core baseline conditions for assessment of setting impacts on heritage assets (paragraph 1.1.1-2). We are satisfied that this is an appropriate assessment methodology and that all designated heritage assets which would experience negative effects have been correctly identified.

3.32 We broadly agree with the results of the assessment presented in the Settings Impact Assessment document. However, in a couple of cases we consider that the level of impact on the designated heritage assets is higher than that identified by the applicant.

3.33 In case of the grade I listed Church of All Saints (NHLE 1114812), the setting assessment concluded that the magnitude of the effect in EIA terms would be moderate for the construction and minor for the operational phase of the project. We consider that the presence of the solar farm within the setting of the church would cause a degree of harm to its significance which would be moderate within less than substantial harm (in NPPF terms) for construction and operational phases. In EIA terms the effect would be moderate adverse.

3.34 In case of a scheduled monument 'Two bowl barrows 900m and 1000m east of Old Manor Farm' (NHLE 1020486) the setting assessment concluded that the magnitude of the effect in EIA terms would be minor for the construction and operational phases of the project. We consider that the presence of the solar farm within the setting of the barrows would cause degree of harm to their significance which would be moderate within less than substantial harm (in terms of NPPF) for construction and operational phases. In EIA terms the effect would be moderate adverse.

**Volume 2 – Technical Appendices Appendix 6-5: Archaeological Geophysical
Survey Report Part 1 of 3 [APP-084]**

3.35 We commented on the Geophysical survey report at the PEIR stage. This is an updated document, for surveys covering 718ha. Despite the amendments our previous comments still apply and are repeated below.

- 3.36 This document presents the findings of a magnetic gradiometry survey carried out over the proposed Scheme area. It was noted that the surveys were carried out in Autumn and Winter (Section 1.1). It is noted in Section 5.1 that adverse weather caused a delay in the survey programme, but information should also be provided about how this impacted the work, such as making some areas of the site inaccessible.
- 3.37 It is stated that the survey was carried out using a Bartington Cart system (Section 5.5) and a Sensys MAGNETO ® MXPDA push cart (Section 5.11). It would be useful to know if any areas investigated during the survey were inaccessible to the carts and if alternative, hand-held options were used. It would also be helpful to include an explanation of why two different systems were used to survey the site.

Volume 2 – Technical Appendices Appendix 6-6: Site A Trial Trench Evaluation Interim Report [APP-087]

- 3.38 It is noted that the finds and environmental assessment are awaited from specialists (Section 7.1 and Appendix B). This information is needed to inform the development of appropriate strategies for the excavation phase. A number of features/deposits of interest have been identified during the evaluation excavations, such as ditch and pit fills that contain charcoal and animal bone. The potential and significance of the deposits cannot be understood without information from the assessment of the environmental samples.
- 3.39 Section 8.1 states that the research objectives were defined by the East Midlands Research Framework. It is not clear why this document was used as the site is not located in the East Midlands. This section should be revised and should refer to the Research Framework for the East of England: <https://researchframeworks.org/eoe/>.
- 3.40 It is noted that some features were identified in areas recorded as ‘blank’ trenches in the geophysical survey report. This suggests that the potential for archaeology to be present could be higher than indicated in the geophysics report alone, and this should be taken into consideration when developing mitigation strategies.
- 3.41 We recommend that the final version of this report is submitted as soon as possible, preferably before the conclusion of the DCO examination.

Volume 2 – Technical Appendices Appendix 6-7: Site B Trial Trench Evaluation Interim Report [APP-088]

- 3.42 It is noted that the finds and environmental assessment are awaited from specialists (Section 7.1 and Appendix B). This information is needed to inform the development of appropriate strategies for the excavation phase. A number of features/deposits of interest have been identified during the evaluation excavations, such as ditches, linear features and pit fills that contain charcoal and animal bone and human remains.
- 3.43 The potential palaeochannels recorded in Trench 427 (Section 6.141) may also preserve palaeoenvironmental remains of interest. The potential and significance of

the deposits cannot be understood without information from the assessment of the environmental samples.

- 3.44 Section 8.1 states that the research objectives were defined by the East Midlands Research Framework. It is not clear why this document was used as the site is not located in the East Midlands. This section should be revised and should refer to the Research Framework for the East of England: <https://researchframeworks.org/eoe/>.
- 3.45 It is noted that some features were identified in areas recorded as 'blank' trenches in the geophysics report (Section 6.41). This suggests that the potential for archaeology to be present could be higher than indicated in the geophysics report alone, and this should be taken into consideration when developing mitigation strategies.
- 3.46 We recommend that the final version of this report is submitted as soon as possible, preferably before the conclusion of the DCO examination.

Volume 2 – Technical Appendices Appendix 6-8: Site C Trial Trench Evaluation Final Report [APP-089]

- 3.47 It is noted that the initial specialist assessments have been carried out for the artefacts and environmental samples recovered from Site C excavations, and that recommendations have been made for further work (Appendix B).
- 3.48 It is stated that further study of the plant remains and charcoal could be beneficial once the assessment of samples from the other areas of archaeological investigation (Sites A, B and D) have been completed (Appendix B). We agree that the value and significance of the assemblage cannot be fully understood until the outstanding environmental samples have been investigated.

Volume 2 – Technical Appendices Appendix 6-9: Site D Trial Trench Evaluation Interim Report [APP-090]

- 3.49 It is noted that the finds and environmental assessment are awaited from specialists (Section 9.2). This information is needed to inform the development of appropriate strategies for the excavation phase. A number of features/deposits of interest have been identified during the evaluation excavations, such as ditches, linear features and pit fills that contain charcoal and animal bone.
- 3.50 The potential palaeochannels recorded in Trench 427 (Section 6.141) may also preserve palaeoenvironmental remains of interest. The potential and significance of the deposits cannot be understood without information from the assessment of the environmental samples.
- 3.51 We recommend that the final version of this report is submitted as soon as possible, preferably before the conclusion of the DCO examination.

4 Comments on draft DCO Order, Other Consents and Licences Statement, Commitments Register, Outline Management Plans and Strategy Documents

Draft Development Consent Order [APP-016]

- 4.1 Historic England welcomes inclusion of Requirements 15 and 16 within the wording of the draft DCO, which are related to archaeological mitigation and enhancement. However, we have some recommendation regarding the wording of requirements.
- 4.2 We recommend that the wording of Requirement 15 (1) is amended to allow for consultation with us in regard to approval of the archaeological written scheme of investigation (WSI).
- 4.3 We recommend that the wording of Requirement 16 (1) is amended to allow for consultation with us in regard to approval of the heritage enhancement strategy.
- 4.4 We consider that the amendments are required to enable Historic England to be informed of the proposal and provide comment as appropriate to the LPA, to support the LPAs in decision making. This is of particular importance to works affecting scheduled monument within draft Order Limits.

Other Consents and Licences Statement [APP-033]

- 4.5 Subject to Historic England being consulted on the final Archaeological Mitigation Strategy prior to any works on Site (in accordance with Requirement 15 of the **draft DCO [PDA-005]**), Historic England is content that the draft DCO would grant Scheduled Monument Consent for the specified works at the 'Roman Small Town south of Great Staughton' scheduled monument (National Heritage List for England ref. 1491190) in accordance with Section 33 of the Planning Act 2008.
- 4.6 We understand that the consent would be granted for the following works: installation of the Scheme's electrical cables beneath the monument via horizontal directional drilling (HDD); provision and removal of the temporary construction access across the monument (during construction and decommissioning); creation of wildflower meadow, creation of permissive footpath, and installation of on-site interpretation.
- 4.7 We recommend that the applicant provides a list of all works proposed within the boundaries of the scheduled monument as part of the DCO documentation. This is necessary for the sake of clarity and to avoid misunderstandings in the future. The list could be provided within Outline Archaeological Mitigation Strategy.

Commitments Register [APP-154]

- 4.8 We welcome inclusion of commitments relevant to management of impacts on historic environment on the Register.
- 4.9 The commitments relevant to historic environment are numbered: C32-34, C39, C54, C59, C60, C75, C98, C99, and C105.

- 4.10 We recommend that wording of commitment C54 is amended to include consultation with Historic England in respect of consultation and approval of the final Archaeological Mitigation Strategy.
- 4.11 We recommend that the commitments should be appropriately secured through final DCO requirements, and final versions of the certified documents: Outline Construction Environmental Management Plan [APP-155], Outline Archaeological Mitigation Strategy [APP-166], and Outline Heritage Enhancement Strategy [167].

Outline Construction Environmental Management Plan [APP-155]

- 4.12 We welcome inclusion of measures aimed at managing impacts of the historic environment in the OCEMP.
- 4.13 We specifically note the measures relevant to works within the scheduled monument – ‘Roman Small Town to the south of Great Staughton’ (Table 5.2). The measures include demarcation of the monument, exclusion of construction of activities with exception of HDD and construction of temporary access track, use specific methodology for HDD and construction of temporary access track. We support inclusion of these measures as they are necessary to prevent adverse impacts on the significance of the designated heritage asset.
- 4.14 We recommend that the timings of removal of temporary access track constructed across the monument are specifically stated among the primary construction stages (paragraph 2.4.3).
- 4.15 We also recommend that the timeframe for certain enhancement measures, such as taking the area of the scheduled monument out of cultivation, is specified among the primary stages of construction. This is needed for clarity and transparency.
- 4.16 In respect of the Site Preparation Works referred to in paragraph 2.4.8 (as outlined in ES Vol 2 Appendix 2-3 Site Preparation Works [APP-057]), we recommend that it is clarified that in addition to provision of the Written Scheme of Investigation, the archaeological evaluation works will need to be undertaken before the commencement of the development. The final scope of archaeological mitigation works likewise would need to be agreed and implemented before commencement of the works in the particular phase of the development.

Outline Decommissioning Environmental Management Plan [APP-158]

- 4.17 We note that it is assumed that any infrastructure located more than 1m below ground level, would be left in situ (paragraph 2.4.2). However, Outline Archaeological Mitigation Strategy [APP-166] specifies that within the scheduled monument buried cabling would be removed by winching cables out. This commitment is welcome, however, we are concerned that if the plastic casing for the cables is left empty, this will lead, in time, to its collapse and potential damage to the buried archaeological deposits above. We would recommend that ways of infilling the disused casing during decommissioning are explored.
- 4.18 We note that it is an assumption of the Project that following decommissioning of the solar farm the land will be handed back to the landowners and might return to

its original use (paragraphs 2.4.2-2.3). In cases of the areas earmarked for creation of neutral grassland and species rich grassland it would be left to discretion of the landowners to either retain grassland use or revert land to arable use (paragraph 2.4.8).

- 4.19 The scheduled monument – ‘Roman Small Town south of Great Staughton’, lies within an area proposed for creation of species rich grassland. Envisioned reversion to previous land use would not be automatically possible in this case under current legislation, as within 6 years of establishment of grazing regime the land will lose its Class Consent (Class 1 - The Ancient Monuments (Class Consents) Order 1994). In our opinion the most appropriate arrangement would be to secure commitment for retention of the grassland use beyond lifespan of the Project.
- 4.20 We consider that the long-term management of the monument would benefit from a degree of additional control following decommissioning. A planning obligation would be the most appropriate mechanism to use. This could be through use of Section 106 of the Town and Country Planning Act 1990 (as amended) or a Conservation Covenant.
- 4.21 We consider that it would be more appropriate to determine the mechanism for ensuring long-term preservation of the monument during examination of the DCO, rather than at the point when the solar farm is being decommissioned (as outlined in paragraph 2.4.8).
- 4.22 We welcome commitment to consultation with Historic England prior to decommissioning of the scheme, as outlined in paragraph 3.2.3.
- 4.23 We welcome commitment to undertaking of the decommissioning work in accordance with the Archaeological Mitigation Strategy (AMS) (Table 5.1).
- 4.24 We note that the decommissioning phase would require construction of a second temporary access track across the monument. This would need to be undertaken in accordance with detailed methodology contained in outline Archaeological Mitigation Strategy [APP-166].

Outline Landscape and Ecological Management Plan [APP-159]

- 4.25 We welcome inclusion of specific management measures within OLEMP for the area covered by scheduled monument (paragraphs 6.3.8-9). We support stated measures – maintaining the site as species diverse grassland meadows without any excavation, ploughing, or planting.

Outline Archaeological Mitigation Strategy [APP-166]

- 4.26 We welcome inclusion of Outline Archaeological Mitigation Strategy in the Project documentation.
- 4.27 We note that paragraph 3.6.1 states that the archaeological evaluation undertaken during pre-application phase is “sufficient to establish the archaeological resource across the site”. While this statement is correct for the majority of the areas within

the draft Order Limits, there are certain areas where archaeological intrusive evaluation has not been undertaken. Most notably, these areas include cable corridors between the sites B and C, and site D and Eaton Socon Substation. Therefore, further evaluation of these areas will be necessary post-consent to establish the presence and significance of any archaeological remains that have not been evaluated yet. We welcome applicant's commitment to further evaluation mentioned in paragraph 3.6.2.

- 4.28 We recommend that the areas specified in section 5 for further geophysical work and/or further intrusive evaluation are clearly depicted on a plan, presented as one of the figures in the OAMS. This is necessary for clarity and for the avoidance of doubt.
- 4.29 We recommend that section 5 should contain specific provision for consultation with Historic England in case of unexpected discovery of heritage assets of equivalent significance to designated heritage assets during the programme of further evaluation.
- 4.30 Final reports covering all phases of evaluation should be made available to, and approved by relevant stakeholders, before the mitigation strategy is finalised.
- 4.31 Paragraph 6.1.2 outlines the programme of archaeological mitigation measures that will be utilised, which includes preservation in-situ, Strip, Map and Sample, Open Area Excavation and Archaeological Monitoring. These mitigation measures are what we would expect to see.
- 4.32 We agree that the list of Archaeological Mitigation Measures presented in Table 1 will need to be revised when all evaluation results are available, as outlined in paragraphs 6.1.5-6.
- 4.33 We note that preservation in-situ has been given priority where possible. As a result, 29 Areas of Archaeological Constraint (AACs) have been identified within the Scheme, where non-intrusive surface-mounted pre-cast concrete ground anchors and surface matting will be used (paragraphs 6.2.1-4). We support this approach to mitigation by design.
- 4.34 We are pleased to see that the potential for fired structures to be dated using techniques, such as archaeomagnetism will be considered (Section 6.2.13). The potential of features will be assessed prior to their excavation, which would ensure that opportunities to date the remains are not missed.
- 4.35 We recommend that it is clarified that relevant stakeholders will have to approve the site-specific Written Schemes of Investigation before the work is undertaken, in line with Requirement 15 of the draft DCO.
- 4.36 We recommend that Historic England should also be consulted if a previously unknown heritage asset is discovered, or a known heritage asset proves to be more significant than predicted, to ensure that impacts on assets of national importance are appropriately mitigated. In certain circumstances preservation in-situ might be

most appropriate mitigation measure. This should be acknowledged in paragraph 6.3.42.

- 4.37 We note the list of the works within scheduled monument to be consented as part of this DCO in paragraph 7.3.20. We would like to highlight that a number of other activities, such as: provision of on-site interpretation, establishment of grassland, provision of permissive footpath, and construction of temporary access during decommissioning phase, which are also mentioned in other application documents in relation to the scheduled monument. It should be clarified if these works will be consented through the DCO or whether a separate application for Scheduled Monument Consent be submitted in due course.
- 4.38 We can confirm that the design and methodology for installation of cables under the scheduled monument by HDD, as outlined in paragraphs 7.3.22-31 and Appendix A is adequate. We support this approach.
- 4.39 With regard to decommissioning phase (paragraph 7.3.30 and 7.5.4), we note that the cable is to be winched out of the conduit. We support this approach; however, we would additionally recommend that methods for infilling of the disused plastic conduit are explored to prevent its collapse.
- 4.40 We are satisfied with the detailed construction design of the HDD under the scheduled monument presented in Appendix A. However, we would like to highlight that the western launch/receiver pit seems to be located within Area of Archaeological Constraint AAC-C-4. The mitigation measures for this AAC are listed in Table 1 as 'Utilisation of No Dig solutions'. We recognise that the locations of the pits are at the moment only indicative. Therefore, we recommend that the final locations are agreed with the stakeholders and impact on archaeological remains is avoided if achievable.
- 4.41 We can confirm that the design and methodology for installation and removal of temporary access track within the scheduled monument, as outlined in paragraphs 7.3.32-31 and Appendix B is adequate. We support this approach.
- 4.42 Historic England should be specified as a stakeholder responsible for monitoring works related to scheduled monument (paragraph 10.2.2).
- 4.43 It should be noted that an updated version of the Historic England document 'Environmental Archaeology' (2025) is available, and should be referred to for the sampling strategies: <https://historicengland.org.uk/images-books/publications/environmental-archaeology-3rd/>.
- 4.44 The Historic England 'Waterlogged Wood' document has also been updated recently and we would recommend that this is referred to: <https://historicengland.org.uk/images-books/publications/waterlogged-wood/>.
- 4.45 Specific sampling strategies may need to be produced for particular remains (e.g. human remains) or for certain types of features (e.g. occupation surfaces, industrial features etc). For example, it is stated in the Historic England document 'The Role of the Human Osteologist in Archaeological Fieldwork Projects' (2018) that spatially

distinct samples should be recovered from an inhumation, from the head, torso and leg/foot area: <https://historicengland.org.uk/images-books/publications/role-of-human-osteologist-in-archaeological-fieldwork-project/>.

- 4.46 Appendix C presents the Reburial of Archaeological Sites checklist, and Appendix D the Reburial Threats and Risks assessment, which is good to see.

Outline Heritage Enhancement Strategy [APP-167]

- 4.47 Historic England is content that the Applicant's outline Heritage Enhancement Strategy is appropriate for the purposes of the examination.
- 4.48 We understand that in relation to the scheduled monument proposed enhancement measures are as follow: cessation of arable cultivation within designated heritage asset's boundaries and maintaining it under grass; enabling public access through creation of circular footpath, provision of on-site interpretation, commitment to funding further archaeological research.
- 4.49 We recommend that the final Heritage Enhancement Strategy should contain details of the above commitments together with timeframes for their implementation. This is necessary to secure their delivery and would enable necessary monitoring of the progress. The finalised document should be agreed with relevant stakeholders.
- 4.50 We expect that cessation of arable cultivation within the boundaries of the scheduled monument should be preferably implemented at the same time as start of construction within site C, and no later than commencement of operation within site C. We would welcome confirmation of the timeframe for this commitment by the applicant.
- 4.51 We consider that proposed enhancement measures would deliver considerable heritage focused public benefit and enhance the significance of the heritage asset.

5 Policy considerations

- 5.1 We note the applicant has set out some of the relevant policy contexts for the historic environment in Planning Statement [APP-031]. The relevant National Policy Statements (NPS) are in this case overarching NPS for Energy (EN-1), NPS for Renewable Energy Infrastructure (EN-3), and NPS for Electricity Networks Infrastructure (EN-5). We are also aware that as the DCO application has been accepted prior to the publication of the updated 2025 NPSs and therefore should be determined in accordance with the 2024 NPSs. Provisions of the National Planning Policy Framework (NPPF 2024) are also relevant in this case.
- 5.2 Approach to the historic environment is considered in and Overarching NPS for Energy (EN-1, 2024), and specifically Section 5.9. Historic Environment. This mirrors the NPPF and specially includes general historic environment paragraphs as well as sections that cover Applicant Assessment, Mitigation and the role of the Secretary of State in decision making. We have not flagged every policy, however, we would like to draw attention to the following.

- 5.3 EN 1 5.9.25 which says the '*...Secretary of State should consider the desirability of sustaining and, where appropriate, enhancing the significance of heritage assets, the contribution of their settings and the positive contribution that their conservation can make to sustainable communities, including to their quality of life, their economic vitality, and to the public's enjoyment of these assets.*
- 5.4 EN 1 para 5.9.27 which states that:
'When considering the impact of a proposed development on the significance of a designated heritage asset, the Secretary of State should give great weight to the asset's conservation. The more important the asset, the greater the weight should be. This is irrespective of whether any potential harm amounts to substantial harm, total loss, or less than substantial harm to its significance.'
- 5.5 EN 1 para 5.9.28 which states that:
'The Secretary of State should give considerable importance and weight to the desirability of preserving all heritage assets. Any harm or loss of significance of a designated heritage asset (from its alteration or destruction, or from development within its setting) should require clear and convincing justification.'
- 5.6 EN 1 para 5.9.32 also states that '*...Where the proposed development will lead to less than substantial harm to the significance of the designated heritage asset, this harm should be weighed against the public benefits of the proposal, including, where appropriate securing its optimum viable use.'*
- 5.7 Again para 5.9.33 notes that in weighing applications that directly or indirectly affecting non-designated heritage assets, a 'balanced judgement' will be required having regard to the scale of any harm or loss and the significance of the heritage asset.
- 5.8 And para 5.9.36:
'When considering applications for development affecting the setting of a designated heritage asset, the Secretary of State should give appropriate weight to the desirability of preserving the setting such assets and treat favourably applications that preserve those elements of the setting that make a positive contribution to, or better reveal the significance of, the asset. When considering applications that do not do this, the Secretary of State should give great weight to any negative effects, when weighing them against the wider benefits of the application. The greater the negative impact on the significance of the designated heritage asset, the greater the benefits that will be needed to justify approval'
- 5.9 Also, of relevance here would be EN 1 para 5.9.13 which states that:
'The applicant is encouraged, where opportunities exist, to prepare proposals which can make a positive contribution to the historic environment, and to consider how their scheme takes account of the significance of heritage assets affected.'

6 Historic England Written Representation: Conclusions

- 6.1 Historic England do not object in principle to the Proposed Development.
- 6.2 We have concluded that a range of designated and non-designated heritage assets would be negatively impacted by the development. A direct, permanent and harmful change could potentially be a significant effect in some cases.
- 6.3 The applicant has given this matter consideration and has provided information to inform the examination via the Historic Environment chapters of the Environmental Statement. We broadly agree with conclusions of the assessment, with the exception of the setting impacts on the grade I listed Church of All Saints, and the scheduled monument 'Two bowl barrows 900m and 1000m east of Old Manor Farm'. In these two cases we have identified a higher residual level of harm than this assessed by the applicant.
- 6.4 We also noted that some final reports for heritage valuation are outstanding and certain areas within draft Order Limit still require further evaluation. Therefore, further information and documents are required to establish significance of certain assets and to devise an appropriate programme of mitigation for non-designated heritage assets. We recognise that some of this work might be undertaken post-consent. This represents a project risk.
- 6.5 We recognise that the scheme has also potential to deliver heritage focused public benefits in relation to 'Roman Small Town south of Great Staughton'.
- 6.6 We are broadly content with the overall approach to the proposed mitigation presented in the Environmental Statement. We are pleased to see that separate Outline Archaeological Mitigation Strategy and Outline Heritage Enhancement Strategy have been submitted.
- 6.7 We have made recommendations for amendments to the draft DCO, the Commitments Register, Outline Construction Environmental Management Plan, Outline Archaeological Mitigation Strategy, and Outline Decommissioning Environmental Management Plan which should be agreed prior to the finalisation/certification of these documents.
- 6.8 We consider these changes are necessary to fully inform the decision-making process, and the planning balance as set out in the relevant policies, and recommend the applicant is asked to provide the additional wording and documents we have set out above. This would need to be before the end of the examination.
- 6.9 We also recommend Historic England is given the opportunity to comment on the revised documents and wording alongside Bedfordshire Borough Council's and Cambridgeshire County Council's archaeological specialists.
- 6.10 The ExA would need to be satisfied that the information provided is sufficient to address the policies set out in EN 1 for the applicant assessment and that there are sufficient safeguards set out with the DCO and accompanying policies to ensure

heritage matters can be managed in a manner that is appropriate to their significance.

- 6.11 As is set out in EN 1 (2024) Para 5.9.32 we are aware it is for the SoS to weigh the balance in relation to the harm and benefit. The ExA would therefore need to be content that the benefits of the proposal would outweigh the harm and that the impact can be justified in terms of those tests set out in EN 1.
- 6.12 Likewise, the Secretary of State would also need to have regard to policies 5.9.25, 5.9.27, 5.9.28, and 5.9.36 in the decision-making process. This is specifically with regards to the impact of the scheme upon the significance of the designated heritage where their settings are affected.