



# EAST PARK ENERGY

**East Park Energy**

EN010141

## Outline Heritage Enhancement Strategy

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Procedure) Regulations 2009: Regulation 5(2)(q)

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# EAST PARK ENERGY

Planning Act 2008

Infrastructure Planning (Applications: Prescribed  
Forms and Procedure) Regulations 2009

## Outline Heritage Enhancement Strategy

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## 1.0 INTRODUCTION

### 1.1 Background

1.1.1 This outline Heritage Enhancement Strategy (oHES) has been prepared for the East Park Energy project ('the Scheme') as part of an application for development consent for the construction, operation and decommissioning of the Scheme.

1.1.2 The document sets out how the Applicant will secure enhancements for the historic environment, separate to the mitigation requirements that are set out within the **outline Archaeological Mitigation Strategy [EN010141/DR/7.15]** and **outline Construction Environmental Management Plan [EN010141/DR/7.3]**.

1.1.3 This oHES 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 granted development consent, the DCO will require that a final Heritage Enhancement Strategy (HES) is prepared and agreed with the local authorities and Historic England prior to operation.

### 1.2 Document Structure

1.2.1 The oHES is structured as follows:

- Introduction;
- The Scheme;
- Legislation, Policy and Guidance;
- Heritage Enhancement Measures;
- Public Benefits; and
- Implementation of Heritage Enhancement Strategy.

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## 1.3 Relationship with Other Management Plans

1.3.1 This oHES 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 the historic environment across the Site and will be developed separate to the oHES, pursuant to DCO Requirements:

- **Archaeological Mitigation Strategy (AMS):** This plan sets out the management of archaeological remains, both known and currently unknown, across the lifetime of the Scheme. It sets out how the mitigation measures and monitoring requirements identified through the Environmental Impact Assessment (EIA) process will be implemented and has been prepared with the objective of compliance with relevant legislation and policy. An **outline Archaeological Mitigation Strategy [EN010141/DR/7.15]** has been prepared and submitted with the application for development consent;
- **Construction Environmental Management Plan (CEMP):** This plan sets out how the construction phase of the Scheme will be managed to avoid, reduce, or mitigate environmental impacts. It covers 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 sets 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 sets out how the decommissioning phase of the Scheme will be

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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 sets 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 ensures 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 details 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.

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## 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]**.

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## 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 Roman town 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.

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- 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.

### **Previously Recorded 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’ or ‘Events’ 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 include 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 Site 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 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 a 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.

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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 previously recorded 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 assets 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

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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.

## **Archaeological Geophysical Survey Findings**

### **East Park Site A**

- 2.1.16 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.
- 2.1.17 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).
- 2.1.18 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**

- 2.1.19 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.

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- 2.1.20 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.
- 2.1.21 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**

- 2.1.22 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

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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.

2.1.23 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.

2.1.24 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**

2.1.25 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).

2.1.26 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.

2.1.27 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

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identified which may be related to the post-medieval quarry (centred Asset 674) but could also be natural in origin.

## **Trial Trenching Findings**

### **East Park Site A**

- 2.1.28 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.
- 2.1.29 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.
- 2.1.30 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).
- 2.1.31 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

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targeted linear anomalies (Anomaly 35a) at the western end of the area identified no remains.

- 2.1.32 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).
- 2.1.33 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.
- 2.1.34 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.
- 2.1.35 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

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representative of late prehistoric settlement activity (though this will need to be confirmed).

- 2.1.36 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.
- 2.1.37 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.
- 2.1.38 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**

- 2.1.39 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.

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- 2.1.40 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.
- 2.1.41 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.
- 2.1.42 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.
- 2.1.43 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.

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- 2.1.44 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.
- 2.1.45 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).
- 2.1.46 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).
- 2.1.47 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).
- 2.1.48 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).
- 2.1.49 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.

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- 2.1.50 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.
- 2.1.51 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.
- 2.1.52 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.
- 2.1.53 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.

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- 2.1.54 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.
- 2.1.55 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.
- 2.1.56 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.
- 2.1.57 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.
- 2.1.58 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

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low density, currently undated, agricultural activity in the form of a field boundaries and furrows.

- 2.1.59 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.
- 2.1.60 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**

- 2.1.61 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. Four targeted were excavated within the Roman Town, in Site C, prior to it being scheduled to confirm the results of the geophysical survey.
- 2.1.62 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).
- 2.1.63 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.
- 2.1.64 The archaeological features comprised ditches, pits and postholes and gravel surfaces that represent roads or yard areas; it was suggested during

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excavation some of the ditches may be associated with beam slots or even bedding trenches for vines.

- 2.1.65 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]**.
- 2.1.66 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.
- 2.1.67 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

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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.

- 2.1.68 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.
- 2.1.69 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 correlated 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.
- 2.1.70 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

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medieval or post-medieval in date and some of the excavated ditches appear to align with field boundaries recorded on late 19<sup>th</sup> century historic mapping.

- 2.1.71 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**

- 2.1.72 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.
- 2.1.73 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).
- 2.1.74 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).
- 2.1.75 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).

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- 2.1.76 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).
- 2.1.77 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.
- 2.1.78 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]**.

## 2.2 The Scheme

- 2.2.1 The Scheme comprises a new ground-mounted solar photovoltaic energy generating station and an associated on-site 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 Development Consent Order 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]**.

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## 3.0 POLICY AND GUIDANCE

### 3.1 National Policy

3.1.1 National-level planning policy for NSIPs is set out in a series of National Policy Statements (NPSs). The 2023 revised NPSs (EN-1 to EN-5) came into force on 17 January 2024.

3.1.2 Para 5.9.13 of the Overarching National Policy Statement for Energy (EN-1) 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. This can include, where possible:*

- enhancing, through a range of measures such a sensitive design, the significance of heritage assets or setting affected*
- considering where required the development of archive capacity which could deliver significant public benefits*
- considering how visual or noise impacts can affect heritage assets, and whether there may be opportunities to enhance access to, or interpretation, understanding and appreciation of, the heritage assets affected by the scheme.’<sup>1</sup>*

3.1.3 It is not anticipated that the Scheme would result in ‘*substantial harm*’ upon any cultural heritage assets and, therefore, the policy test with regard to ‘*substantial harm*’ is not applicable<sup>2</sup>. Paragraph 5.9.32, which relates to ‘*less than substantial harm*’, of the Overarching National Policy Statement for Energy (EN-1) states that:

*‘Where the proposed development will lead to less than substantial harm to the significance of the designated heritage asset, this harm*

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*should be weighed against the public benefits of the proposal, including, where appropriate securing its optimum viable use.’<sup>3</sup>*

3.1.4 Paragraph 5.9.33 states that:

*‘In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.’<sup>4</sup>*

## 3.2 Local Policy

3.2.1 The Huntingdonshire Local Plan to 2036 includes a heritage strategy which states that:

*‘The Council will work proactively with property owners and other stakeholders to ensure positive management of heritage assets. This management will recognise the significance of the historic environment and its contribution to local character and identity whilst accommodating the changes necessary to secure viable and sustainable uses. Where possible opportunities will be taken to enable public enjoyment and interpretation of heritage assets’.<sup>5</sup>*

3.2.2 Policy LP34 within the plan sets out the policy for heritage assets and their settings, requires that where heritage assets are to be impacted that an assessment will be required and then outlines what is required in the assessment. With specific regard to heritage assets and their settings the policy notes that the assessment should identify ‘...ways in which the proposal could make a positive contribution to, or better reveal the significance of, affected heritage assets and their settings’.<sup>6</sup> The policy goes on to note that with regard to designated assets ‘The Council will consider the significance of a designated heritage asset and where there is less than substantial harm, this will be weighed against the public benefits of the proposal. Where there is deemed to be substantial harm, then the proposal would need to achieve substantial public benefits to outweigh that harm.

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*Where a non-designated heritage asset would be affected a balanced judgement will be reached having regard to the scale of any harm and the significance of the heritage asset’.*<sup>7</sup> With regard to archaeology the policy also notes that: *‘Where possible and appropriate the preservation of archaeological remains in-situ should be ensured. Where this is either not possible or not desirable, as agreed with the Council, provision must be made for comprehensive recording, analysis of the results and publication. There will also be a requirement for preservation and, where practical, enhancement’.*<sup>8</sup>

- 3.2.3 The Bedford Borough Local Plan 2030 includes heritage provisions which include an expectation that development should *‘contribute to good place making by taking a proactive approach to sustaining and enhancing the historic environment’*<sup>9</sup> and that *‘Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm will be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use’.*<sup>10</sup>

### **3.3 Guidance**

- 3.3.1 The principles and policies outlined above indicate that possible impacts should be offset through enhancement measures including public benefits which would seek to increase the understanding, appreciation and experience of the heritage assets in question.
- 3.3.2 ClfA produced a professional practise paper in 2021 relating to Delivering public benefit.<sup>11</sup> This paper *‘sets out the rationale for putting public benefit at the heart of all archaeological work’* through a series of case studies and *‘provides practical advice and suggestions for doing so’.*<sup>12</sup>
- 3.3.3 The paper suggests that we should be *‘ensuring that our work provides some form of benefit to the public’* and that although public benefit *‘can be difficult to define, we can, in collaboration with various stakeholders, choose how to define it for each project we undertake’.*<sup>13</sup>

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3.3.4 The paper goes on to note the *‘creation of knowledge and increasing understanding are important aspects of public benefit but are not the only ways we can contribute to the concept, so we need to be innovative and consider alternative ways of providing benefit from our work’*.<sup>14</sup>

3.3.5 The paper goes on to highlight that *‘work on the potential of archaeology to contribute to wellbeing has illustrated the positive benefits people report after experiencing community archaeology, handling artefacts and even just being in proximity to historic places’*.<sup>15</sup>

3.3.6 A recent paper by Association of Local Government Archaeology Officers (ALGAO) on the Delivery of Public Benefit and Social Value: Guidance for Archaeology in the Planning Process<sup>16</sup> notes that that in order to achieve the policy aims of public benefit:

*‘...Applicants/Developers and their Archaeological Contractors are expected to include public engagement and social value opportunities, as appropriate, in each of their developments where archaeological work to mitigate and offset harm to heritage assets is required. The emphasis is to be proportionate and reasonable at all times, balancing the scale of the development against the scale and significance of the archaeological works and what is found. These public activities should not be seen as an additional burden, but rather as a mechanism for maximising the positive contribution the development is making to local communities’*.<sup>17</sup>

3.3.7 It goes on to note that:

*‘Archaeological works are not limited to just being a means for discharging responsibilities imposed through the planning process, or indeed through any duty of care for the historic environment. Archaeology can also provide benefits to the Applicant and/or Developer/Landowner which extend beyond the recovery of information about our collective past’*.<sup>18</sup>

## 3.4 Research Framework

- 3.4.1 The East of England Regional Research Framework (EERF)<sup>19</sup> provides the research framework for the area covered by the Site. It was most recently reviewed in 2018–20 by ALGAO East of England.
- 3.4.2 Relevant sections of the framework and questions posed therein will be used in developing the specific final oHES proposals.

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## 4.0 HERITAGE ENHANCEMENT MEASURES

### 4.1 Aims and Objectives

4.1.1 The Scheme aims to increase the ability to understand, appreciate and experience assets and their significance through increased investigation of the affected assets and/or related assets. Based on the results of these works the proposal aims to widen the audience which has access to this information.

4.1.2 The key aims and objectives of the oHES are:

- To increase understanding, appreciation and experience of the historic environment within the Site and East of England in general, with particular reference to the newly discovered small Roman town at Great Staughton Scheduled Monument (Asset 991) and the ladder settlement in the southern part of Site B (Asset 275);
- To increase knowledge of these assets and increase archaeological skills and capacity through community involvement in archaeological survey and fieldwork;
- To increase access to the assets themselves, and to increase access to information about the assets, specifically ensuring access is more inclusive and is available to a diverse audience; and
- To utilise the historic environment of the Site to support health and wellbeing.

4.1.3 The final HES will ensure that a greater understanding of the assets affected by the Scheme would be achieved, and that knowledge would be disseminated, in line with policy, guidance and in relation to the research framework set out in Section 3 above. Specific resultant public benefits, arising from the oHES proposals below are discussed in Section 5.

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## 4.2 Public Engagement

### Research and Investigation

- 4.2.1 As set out in Section 3.0 of the **oAMS [EN010141/DR/7.16]**, the Applicant is committed to further archaeological research and investigation prior to construction of the Scheme. The primary purpose of this further investigation is to establish the final archaeological mitigation measures to be embedded into the detailed design of the Scheme.
- 4.2.2 The further archaeological research and investigation will provide opportunities for surveys and excavations for heritage enhancement, including through the involvement of local community interest groups.
- 4.2.3 Surveys and excavations would aim to contribute to the EERF (aiming to answer relevant research questions set out therein) and the historic environment record, whilst providing training and work experience in archaeological skills for volunteers and students alike. Research agendas surrounding Roman towns and settlement and Roman roads would be further developed.
- 4.2.4 At this stage it is envisaged that for the further archaeological investigations, a series of training workshops would be held, designed to teach project participants the techniques of research, field survey and excavation, all of which help interpret archaeological assets and historic landscapes.
- 4.2.5 The workshops would be designed to deliver training in techniques of historical research, LiDAR interpretation, topographic survey, geophysical survey, excavation and post-excavation finds analysis, allowing project participants to potentially be involved in every stage of the archaeological programme. All components of the proposed workshops would be supervised by professional archaeologists and funded by the Applicant, but open to members of the public and run as training exercises.

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### 4.3 Roman small town south of Great Staughton

- 4.3.1 Further detailed desk-based research would be undertaken into the Roman small town south of Great Staughton which would include establishing any potential relationships between it and similar towns within the East of England.
- 4.3.2 The Applicant also intends to fund and support further intrusive investigation into this archaeology, subject to receipt of Scheduled Monument Consent (SMC), and will seek to partner with universities or colleges to develop detailed research objectives for the town. The scope of any such investigation would be discussed and agreed through a written scheme of investigation (WSI) with Historic England and Cambridgeshire Historic Environment Team (CHET) prior to commencement.
- 4.3.3 It is envisaged that any survey works across this area would include public participation, which could include community groups, educational or other institutional groups, or interested individuals.

### 4.4 Ladder Settlement in Site B

- 4.4.1 Further detailed desk-based research would be undertaken into the Ladder Settlement (Asset 275) which would include establishing any potential relationships between it and similar settlements within the East of England.
- 4.4.2 The Applicant also intends to fund and support further intrusive investigation into this archaeology and will seek to partner with universities or colleges to develop detailed research objectives for the asset. The scope of any such investigation would be discussed and agreed through a written scheme of investigation (WSI) with Bedford Borough Historic Environment Team (BBHET) prior to commencement. Any such further intrusive investigation into this archaeology would be undertaken separately from the proposed strip map and sample mitigation excavation works within this area (AAC-B-5B).

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- 4.4.3 It is envisaged that any survey works across this area would include public participation, which could include community groups, educational or other institutional groups, or interested individuals.

## 4.5 Dissemination of Research

- 4.5.1 In order to ensure (in line with policies, strategies and guidance outlined in Section 3) that the results of all investigations are disseminated and contribute to increased access to and understanding of the historic environment, a number of interpretive initiatives are set out below. These initiatives have been designed with the aim of utilising the historic environment of the Site to support health and wellbeing.

### **Heritage Trail and On-Site Interpretation Panels**

- 4.5.2 It is proposed that interpretation panels would be placed across the Site for the heritage assets both within the Site and assets of relevance in the wider local landscape. The interpretation panels would serve to guide and direct visitors to the assets within the Site and also act as an orientation point from which to direct visitors to other interesting heritage assets in the region.
- 4.5.3 The text and images for the interpretation panels will be produced by undertaking detailed desk-based assessment and further investigation of the assets to be presented. This will in part include research undertaken with participation from local community interest groups as set out in Section 4.2. This will ensure the interpretation panels convey general information about the asset types as well as site specific details. New information and detailed illustrative material resulting from all archaeological works undertaken for the Scheme would be presented as part of the interpretative panels. The detail of the text and images to be contained on interpretation panels will be agreed with CHET, Bedford Borough Historic Environment Team (BBHET), and Historic England as part of the final HES.
- 4.5.4 The interpretation panels will be set in areas of heritage interest, for example near to the small Roman town at Great Staughton Scheduled Monument. The

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exact locations of the interpretation panels would be agreed with CHET, BBHET, Historic England and participating community interest groups prior to completion.

- 4.5.5 The interpretation panels will allow increased access to the heritage assets on Site and will enable an uninformed observer to better understand and appreciate the assets and their significance. The experience of the assets will be improved since, through their interpretation, they will be more readily comprehended.
- 4.5.6 To maximise the potential benefits of interpretation panels around the Roman small town at Great Staughton, permissive paths are proposed as part of the Scheme (as set out in the **outline Landscape and Ecological Management Plan [EN010141/DR/7.7]**) to follow field edges in the north of the Site between the River Kym and New Wood. The permissive paths would not be surfaced so that they are in keeping with the existing character of public rights of way in the local landscape, and to avoid any excavation or direct impact to any potential archaeology. The intention is for the permissive paths to form a short ‘heritage trail’ beginning and ending at the bridge crossing of the River Kym, with multiple interpretation panels along the route based on the further research to be carried out (as set out above).

### **Public Engagement via Community Talks**

- 4.5.7 The Applicant has already been undertaking community engagement with regard to the archaeological discoveries at the Site, including:
- A community talk open to residents of the parish of Great Staughton, which was held in March 2025;
  - A school visit and presentation to children at Great Staughton Primary School in March 2025; and
  - A presentation and talk to the Bedfordshire Local History Society, which was held in June 2025.

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- 4.5.8 Further engagement with local communities is also already planned by the Applicant, including
- A presentation to the Cambridgeshire Antiquarian Society is scheduled for November 22<sup>nd</sup> 2025 and a paper will be submitted for inclusion within the Proceedings of the Cambridgeshire Antiquarian Society in early 2026.
  - Participation at the Kimbolton School / Castle '*Knights, Queens and Time Machines - A Living History Event*' scheduled for the 3<sup>rd</sup> and 4<sup>th</sup> of May 2026.
- 4.5.9 Additional opportunities for presenting the findings of any archaeological investigations will also be sought (contact will be made with both the Cambridgeshire Association for Local History and the Huntingdonshire Local History Society in addition to other options identified).
- 4.5.10 The Applicant will also provide further return talks (to already engaged groups) once further archaeological investigations are complete to provide updated information to local communities.
- 4.5.11 Finally, the Applicant will provide community open days and guided tours during selected future archaeological investigations.

### **Mobile Friendly Website**

- 4.5.12 In addition to the proposed interpretation panels a mobile friendly website will be developed which will allow for remote access to the body of research developed as part of the Scheme.
- 4.5.13 The mobile friendly website will include details of heritage assets within the Site and outline the history of the assets using information obtained during the archaeological programme of works.
- 4.5.14 The website will be supported by photographs and plans, both historical and modern. Consideration will be given to the inclusion of 3D models and other products of the archaeological programme of work, as well as audio content designed specifically for interpretation.

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4.5.15 The mobile friendly website would not only enhance interpretation for on-site visitors but also provide more inclusive access to the heritage assets on Site by making them accessible, virtually, to a wider audience, who may not be able to access the Site directly or who chose alternative ways to engage with heritage.

### **Educational Packs**

4.5.16 An educational pack, covering the history and archaeology of the Site will be produced. Its primary focus would be the Late Iron Age to Roman periods, but it would also cover the medieval period given the proximity of the Site to several medieval churches, moated sites and manors.

4.5.17 The educational packs will be created for dissemination to local schools and for use by local community and other educational groups, charities and trusts and would also be made available via the website. The education pack will be written to accord with the National Curriculum Key Stages. The pack will clearly state how it will help develop the capacities required of National Curriculum Key Stages and will suggest ways of linking with specific curricular areas to produce a cross-curricular resource.

4.5.18 The educational pack will include information about archaeology as a discipline, archaeological techniques and the archaeology of the region. Specifically, the packs will draw on the archaeological works as described above as well as other suitable imagery, existing records and contextual information.

4.5.19 Teachers' notes will be provided which cover signposting to relevant websites and resources for introductory information and the wider context of the pack. Suggestions for key questions, discussion areas, activities for students and ideas for further research will be included.

4.5.20 The educational pack will include a range of resources provided as digital documents, which could be printed or used virtually, and a single set of

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exemplar documents. This will enable teachers to print or copy as many as are required for their specific needs or issue to their students digitally.

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## 5.0 RESULTANT PUBLIC BENEFITS

### 5.1 Summary of Public Benefits

5.1.1 In line with national planning policy<sup>20</sup>, where impacts cannot be avoided, activities ‘*which can make a positive contribution to the historic environment*’ may be required. The ALGAO paper, *Delivery of Public Benefit and Social Value: Guidance for Archaeology in the Planning Process*<sup>21</sup> notes that that in order to achieve public benefit:

*‘...Applicants/Developers and their Archaeological Contractors are expected to include public engagement and social value opportunities, as appropriate, in each of their developments where archaeological work to mitigate and offset harm to heritage assets is required. The emphasis is to be proportionate and reasonable at all times, balancing the scale of the development against the scale and significance of the archaeological works and what is found. These public activities should not be seen as an additional burden, but rather as a mechanism for maximising the positive contribution the development is making to local communities’.*<sup>22</sup>

5.1.2 The paper further sets out types of public engagement required as part of normal archaeological mitigation as well as what is termed ‘*enhanced type[s] of Public Engagement Activity*’<sup>23</sup> and notes the resultant public benefits that could arise from these activities. The activities set out in this oHES, including the key aims and objectives set out in Section 4.1, have been designed with these resultant public benefits in mind. Table 1 below outlines each of the activities proposed in the oHES and indicates the resultant public benefits in line with the criteria.

**Table 1: Heritage Enhancement Strategy activities and resultant public benefits**

<b>oHES Activity</b>	<b>Resulting Public Benefit</b>
Results of proposed archaeological fieldwork and geophysical surveys as shared with the Historic Environment Record, OASIS, etc.	Freely accessible information; sharing of knowledge gained; increased accrued value allowing synthesis of knowledge and updated research aims.
Conducting talks disseminating results of archaeological investigation to local parishes/ regional history societies / national bodies (ClfA, CBA etc.).	Freely accessible information; sharing of knowledge gained; increased accrued value allowing synthesis of knowledge and updated research aims.
Volunteer engagement/recruitment through involvement of volunteers in the further archaeological investigation.	Wider range of people involved in heritage; new skills learned; skill enhancement; increased understanding of the historic environment; increased well-being.
Local and online workshops covering a wide range of topics including, but not limited to, desk-based research with documents, aerial photographs, landscape study, LiDAR and other remote sensing data, project management; post-excavation, interpretation.	New skills; increased knowledge; increased understanding and awareness of historic environment; increased well-being.
Events: Open days; site tours; guided walks, living history, archaeology/heritage events.	Increased understanding and awareness of historic environment; increased well-being.
Increased site access via on-site interpretation and heritage trail enhanced by Mobile Friendly Website	Increased community pride, sense of place; improved health and well-being for users.
Educational Packs	Increased understanding and awareness of historic environment; contributing to STEM learning.
Mobile Friendly Website allowing remote site access for online audiences	Sharing of new knowledge gained; positive promotion of site/community/region to wider audience; increased awareness and understanding of the historic environment; allowing of inclusive access to the Site and shared heritage.

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- 5.1.3 The oHES [EN010141/DR/7.16] activities would contribute to the Scheme meeting public benefit outcomes as “*sharing archaeological discoveries creates a positive impact with local communities; helps connect the new development with a local community; [and] creates an opportunity for a different narrative in terms of impact of development*”, as set out in ‘Delivery of Public Benefit and Social Value & Guidance for Archaeology in the Planning Process’.<sup>24</sup>
- 5.1.4 The resultant public benefits would increase not only understanding of the assets, but would increase appreciation and experience of them through increased access and interpretation; thus enhancing an understanding, appreciation and experience of the local historic environment and adding further public benefit to the development.

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## 6.0 IMPLEMENTATION OF HERITAGE ENHANCEMENT STRATEGY

### 6.1 Implementation

- 6.1.1 The heritage enhancement measures set out in the final HES will be discussed and agreed with CHET, BBHET, and where necessary, Historic England.
- 6.1.2 The final HES will define all responsibilities, roles and actions required for implementation of the measures that are set out in this oHES.
- 6.1.3 All archaeological investigations will be undertaken as set out in the final Archaeological Mitigation Strategy, which will be prepared in substantial accordance with the **oAMS [EN010141/DR/7.15]**.

### 6.2 Management

- 6.2.1 It is acknowledged that establishing interpretation panels and a project website would require maintenance and monitoring. On this basis and depending on the activities included in the final HES, the final HES will set out the Applicant's responsibilities, for management, monitoring and maintenance across the operational phase of the Scheme.

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## 7.0 REFERENCES

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<sup>1</sup> *ibid.* Para 5.9.13.

<sup>2</sup> *ibid.* Para 5.9.31.

<sup>3</sup> *ibid.* Para 5.9.32.

<sup>4</sup> *ibid.* Para 5.9.33.

<sup>5</sup> Huntingdonshire District Council. 2019. *Huntingdonshire's Local Plan to 2036. Page 119.* Available at: <https://www.huntingdonshire.gov.uk/media/3872/190516-final-adopted-local-plan-to-2036.pdf> [Last Accessed: 04 June 2024]

<sup>6</sup> *ibid.* Policy LP34. Page 121.

<sup>7</sup> *ibid.*

<sup>8</sup> *ibid.* Policy LP34. Page 122.

<sup>9</sup> Bedford Borough Council. 2020. *Local Plan 2030. Policy 28S. Page 61.* Available at: [Local Plan 2030 - Overview | Bedford Borough Council](#) [Last Accessed: 04 June 2024]

<sup>10</sup> *ibid.* Policy 41S. Page 79.

<sup>11</sup> ClfA. 2021. Professional Practice Paper: Delivering public benefit. Available at: [https://www.archaeologists.net/sites/default/files/2024-11/ClfA-Delivering-Public-Benefit\\_2021.pdf](https://www.archaeologists.net/sites/default/files/2024-11/ClfA-Delivering-Public-Benefit_2021.pdf) [Last Accessed: 04 June 2024]

<sup>12</sup> *ibid.* Page 1.

<sup>13</sup> *ibid.* Page 4.

<sup>14</sup> *ibid.* Page 18.

<sup>15</sup> Pennington A, Jones R, Bagnall A-M, South J and Corcoran R, 2018. *The impact of historic places and assets on community wellbeing – a scoping review.* London: What Works Centre for Wellbeing. Referenced within ClfA. 2021. *Professional Practice Paper: Delivering public benefit. Page 18.* [Last Accessed: 04 June 2024]

<sup>16</sup> Mann, B. 2023. *Delivery of Public Benefit and Social Value & Guidance for Archaeology in the Planning Process.* Available at: [https://www.algao.org.uk/sites/algao.org.uk/files/2023-02/ALGAO\\_Delivery\\_of\\_Public\\_Benefit\\_Social\\_Value\\_Guidance.pdf](https://www.algao.org.uk/sites/algao.org.uk/files/2023-02/ALGAO_Delivery_of_Public_Benefit_Social_Value_Guidance.pdf) [Last Accessed: 04 June 2024]

<sup>17</sup> *ibid.*

<sup>18</sup> *ibid.* Page 12.

<sup>19</sup> Research Frameworks Network, 2025. *East of England Regional Research Framework.* Available at: <https://researchframeworks.org/eoe/> [Last Accessed: 04 June 2024]

<sup>20</sup> Department for Energy Security and Net Zero (2024). *Overarching National Policy Statement for energy (EN-1). Paras 5.9.31 to 5.9.33.* Available at:

<https://www.gov.uk/government/publications/overarching-national-policy-statement-for-energy-en-1>  
[Last Accessed: 04 June 2024]

<sup>21</sup> Mann, B. 2023. *Delivery of Public Benefit and Social Value & Guidance for Archaeology in the Planning Process*. Available at: [https://www.algao.org.uk/sites/algao.org.uk/files/2023-02/ALGAO\\_Delivery\\_of\\_Public\\_Benefit\\_Social\\_Value\\_Guidance.pdf](https://www.algao.org.uk/sites/algao.org.uk/files/2023-02/ALGAO_Delivery_of_Public_Benefit_Social_Value_Guidance.pdf) [Last Accessed: 04 June 2024]

<sup>22</sup> *ibid.* Page 4.

<sup>23</sup> *ibid.* Page 8.

<sup>24</sup> Mann, B. 2023. *Delivery of Public Benefit and Social Value & Guidance for Archaeology in the Planning Process*. Available at: [https://www.algao.org.uk/sites/algao.org.uk/files/2023-02/ALGAO\\_Delivery\\_of\\_Public\\_Benefit\\_Social\\_Value\\_Guidance.pdf](https://www.algao.org.uk/sites/algao.org.uk/files/2023-02/ALGAO_Delivery_of_Public_Benefit_Social_Value_Guidance.pdf) [Accessed 04 June 2025]