

Dear Inspector  
Response to LIRs

Ahead of Deadline 2 of your examination of the East Park Energy NSIP I would like to make some comments. Whilst I take issue with a number of assessments in the Local Impact Reports 'LIRs' produced by all three local authorities which consistently understate the level of harm, my comments in this representation are limited to the Heritage and Archaeology sections of the LIR produced by Bedford Borough Council 'BBC'.

Whilst concurring with some of the more substantive concerns raised by BBC, I believe that they generally understate the level of harm that the EPE scheme would cause. They do however make two specific underestimates of the impacts in their LIR.

1. The report fails to recognise fully the very significant risks that EPE scheme poses to the below ground archaeology by not carrying out a comprehensive intrusive trial trenching exercise and evaluation of the archaeology underlying sites A & B and the cable corridors PRIOR to completion of the Examination phase.

This is also the case with site D and parts of site C and related cable corridors although this is not raised by BBC as it is in Cambridgeshire CC and Huntingdonshire DC.

The piling and trenching works proposed as part of the construction phase pose a very material risk of causing more than substantial harm to the significance of any underground archaeological remains and evidence which is believed from the very limited trial trenching carried out so far, run from the Neolithic through to the Bronze age, the Iron age, Roman, Romano-British, Anglo Saxon and Later Medieval as well as more recent historical periods.

Proper evaluation requires a thorough intrusive investigation and review of the archaeology at the examination stage and at the hearings with sufficient evidence, analysis and scrutiny to be provided well ahead of any DCO decision.

Postponing proper intrusive investigations, until after the DCO decision when momentum will have gathered and a time and resource challenged BBC Historic Environment Team 'BBHET' could be put under pressure, creates a risk that BBHET as well as Cambridgeshire Historic Environment Team CHET and Huntingdon Historic Environment Team HHET could be pushed into prematurely agreeing to EPE's mitigation plans without adequate detailed scrutiny.

2. Whilst I support some of the concerns that BBC expresses, for example that relating to the impact on the views to and from and setting of Grade 1 listed C13th All Saints Church Little Staughton (Asset 38) and from the Scheduled Monument C13th The Old Manor House Cretingsbury and all along the ancient causeway between the two historic assets, I believe that the impact on other heritage assets around sites A and B is seriously underestimated particularly by the applicant and also by BBC.

In particular I disagree with the view expressed in Section 8 of the LIR on Cultural Heritage and Archaeology paragraph 8.5 that less than substantial harm to the significance that would be caused to the setting of Grade 1 listed C12th St Peter's Church Pertenhall ( Asset 48).

BBC base their opinion on the asset being viewed from the West looking eastwards towards the Church where the impact is more modest as it sits in low ground and is surrounded by mature trees and vegetation.

BBC do not however adequately reflect the damage that would be done to the setting of St Peter's Church when looking westwards from the East such as from the intersection of Byway 25 and Footpath 5, a position which is believed to be close to the location of a possible C12th or C13th medieval moated Manor House used by the Knights Templar.

The setting of St Peter's Church is also damaged when viewed from the circa 250m entire length of the ridgeway spanned by Footpath 5.

The backdrop and setting of St Peter's Church from these vantage points to the East would lead to it suffering more than substantial harm to the significance from the EPE scheme. The classification of 'less than substantial harm' is incorrect when all viewpoints are considered.

For context on the importance of St Peter's Church and views of it looking from the East is that the Church was used by the Knights Templar community who had a chapel at the eastern end of the North Arcade of the Church until it was demolished in early C19th to make way for the current Vestry.

It is likely that the Knights Templar community looked westward from their Manor House towards the Church and used intervening footpaths to access the Church.