

Response deadline: 26th May 2026

Our ref: PL00794261

Project: East Park Energy Project

Your Ref: EN010141

Registration ID: [REDACTED]

Response by: [REDACTED]
Inspector of Ancient Monuments

Telephone: [REDACTED]

Dear Sir/Madam,

East Park Energy Development Consent Order (Application Reference: EN010141)
Comments of the Historic Buildings and Monuments Commission for England (Historic England) on
further information/ submissions received by deadline 2

Historic England is the Government's statutory adviser on the historic environment. It is our duty under the National Heritage Act 1983 to secure the preservation and enhancement of the historic environment. Our objective is to ensure that the historic environment generally, and designated heritage assets especially, are fully considered in the determination of this DCO.

Historic England has previously provided written representations regarding the Development Consent Order application for the East Park Energy Project. Additional documents have been submitted to the Examining Authority by the applicant for deadline 2 (28 April 2026). Our current comments relate only to these new and revised documents. We specifically focused on the following documents which are relevant to the historic environment matters:

- ES Vol 2 Appendix 6-6 Site A Trial Trench Evaluation Final Report P03 [REP02-015]
- ES Vol 2 Appendix 6-7 Site B Trial Trench Evaluation Final Report P02 [REP02-016]
- ES Vol 2 Appendix 6-8 Site C Trial Trench Evaluation Final Report P02 [REP02-017]
- ES Vol 2 Appendix 6-9 Site D Trial Trench Evaluation Final Report P02 [REP02-018]
- Outline Construction Environmental Management Plan (Clean) P03 [REP02-028]
- Outline Decommissioning Environmental Management Plan (Clean) P03 [REP02-030]
- Outline Archaeological Mitigation Strategy (Clean) P03 [REP02-034]

Historic England Advice

ES Vol 2 Appendix 6-6 Site A Trial Trench Evaluation Final Report P03 [REP02-015]; ES Vol 2 Appendix 6-7 Site B Trial Trench Evaluation Final Report P02 [REP02-016]; ES Vol 2 Appendix 6-8 Site C Trial Trench Evaluation Final Report P02 [REP02-017]; ES Vol 2 Appendix 6-9 Site D Trial Trench Evaluation Final Report P02 [REP02-018]

We note that the amended documents incorporate the changes Historic England previously requested in the written representations. We are pleased to see that the specialist reports have been included in the report (Appendix B). This information will help them develop strategies for the next archaeological mitigation.

It was also good to see that recommendations have been made for further work and where material should be retained in Appendix B.

It was noted that some significant metal artefacts were recovered from Site D, including a Roman Colchester type brooch. It would be useful to consider the conservation and analysis needs of the metal objects.

We consider that the amended reports outlining the results of the archaeological evaluation are adequate for the purpose of this examination.

Outline Construction Environmental Management Plan (Clean) P03 [REP02-028]

Historic England welcomes changes to the mitigation and management measures in respect of the construction works affecting the scheduled monument as outlined in Table 5.1. We specifically note the clarification of timeframes for removing the monument from cultivation and the removal of the temporary access track. We consider that these amendments address our previous comments and provide necessary clarity.

We understand that our previous comments (Written Representation 4.16) related to clarification of the timings of: further archaeological evaluation works, agreement of final scope of the archaeological mitigation measures, and implementation of the archaeological mitigation measures will be addressed in other documents. These elements of archaeological evaluation and mitigation will need to be agreed and implemented before commencement of the works in the particular phase of the development.

Outline Decommissioning Environmental Management Plan (Clean) P03 [REP02-030]

Historic England welcomes changes to the mitigation and management measures in respect of the decommissioning works affecting the scheduled monument as outlined in Table 5.1. We specifically note inclusion of the commitment to backfill the buried conduit with a suitable non-contaminative inert material and the clarification of timeframes for the removal of the temporary access track. We consider that the amendments address our previous comments in respect to these points. However as final details of the proposed method of backfilling are not available at this point, we would need to be consulted, and final details will need to be agreed before this action is implemented.

Historic England will continue to engage with the applicant over the issues related to long-term management of the scheduled monument beyond lifespan of the Project.

Outline Archaeological Mitigation Strategy (Clean) P03 [REP02-034]

We welcome inclusion of the 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 in paragraphs 5.3.4 and 6.3.42. We can confirm that we are content with proposed approach.

Historic England notes revision to the list of the works within scheduled monument in paragraph 7.3.20. We can confirm that we would support consenting of the listed works as part of this DCO. Any works that are not listed, would require a separate application for Scheduled Monument Consent (as outlined in the paragraph 7.3.21). This includes creation of the temporary access track for the decommissioning phase of works.

We note clarification of the timeframe for removal of the scheduled monument from cultivation (paragraph 7.3.36). This action would be taken early during implementation of the project. We support this approach.

We note commitment to remove the temporary access track prior to the date of final commissioning of the final phase of the construction period (paragraph 7.3.42). We can confirm that the timeframe for this provision is appropriate.

We note inclusion of the commitment to backfill the buried conduit with a suitable non-contaminative inert material in paragraph 7.5.6. Historic England supports this commitment, however as final details of

the proposed method of backfilling are not available at this point, we would need to be consulted, and final details will need to be agreed with us before this action is implemented.

Paragraphs 10.2.2 and 10.2.3, have been amended to include provisions for consultation with Historic England over matters affecting nationally significant archaeological remains. We welcome these changes and can confirm that the provisions are appropriate.

We note that the document referenced as Historic England 2015c (in paragraph 6.3.37), in relation to sampling, is not included in the bibliography at the end of the document. We recommend that it is clarified which document is referenced. We would also recommend that the Historic England document 'Environmental Archaeology' (2025) is referred to when developing sampling strategies: [Environmental Archaeology - A Guide to the Theory and Practice of Methods, from Sampling and Recovery to Post-excavation \(third edition\) | Historic England](#)


Historic England welcomes addition of a plan clearly identifying areas for further geophysical work and/or further intrusive evaluation in an appendix E. This provides necessary clarity over the extent of the further archaeological evaluation proposed as part of the project. As these evaluation works relate to non-designated heritage assets with archaeological interest we defer to relevant Local Authority archaeological advisors to provide any further comment.

Summary

Historic England welcomes submission of the additional documents by the applicant. The current versions of these documents address majority of our concerns raised in previous representations.

We will continue to engage with the applicant over changes to the wording of the draft DCO and the issues related to long-term management of the scheduled monument beyond lifespan of the Project.

If you require clarity or further information on any matters, we have raised in the letter above or have other comments, please do not hesitate to contact us directly.


Inspector of Ancient Monuments

Email: @historicengland.org.uk