Meridian Solar Farm

EN010169

Volume 7

Other Documents

7.1 Appendix E: Heritage Harm Statement

APFP Regulation 5(2)(q)

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

March 2026

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1. Introduction

1.1.1. This statement has been prepared by JBA Consulting on behalf of Meridian Solar Farm Limited (hereafter referred to as 'the Applicant') as part of its application for a Development Consent Order ('the DCO Application') for the construction, operation and decommissioning of the proposed Meridian Solar Farm ('the Scheme'). The DCO Application is for a Nationally Significant Infrastructure Project ('NSIP') comprising the construction, operation (including maintenance) and decommissioning of a solar photovoltaic (PV) electricity generating station with associated infrastructure, including co-located Battery Energy Storage System (BESS), Inter-Array Connections to link the land parcels that form the Solar Development Areas, and an up to 13 kilometres (km) overhead line Grid Connection (with one short undergrounded section) which would run north towards a point of connection (PoC) at the proposed Weston Marsh B National Grid Electricity Transmission (NGET) substation, to the north of Weston.

1.1.2. A full description of the Scheme is included in **Environmental Statement (ES) Chapter 2: The Scheme** (Doc Ref. 6.1). An overview of the Scheme and its environmental impacts is provided in the **Environmental Statement Non-Technical Summary** (Doc Ref. 6.1).

1.1.3. Legislation and national planning policy, considered relevant to the determination of the Development Consent Order (DCO) application, identifies the need to present an assessment of harm to designated heritage assets affected by the Scheme. The Secretary of State must consider this in the decision as to whether to grant a DCO. The purpose of this Heritage Harm Statement is to set out the assessment of harm that the Scheme may have upon designated heritage assets, and those assets considered to be demonstrably of national significance (see paragraph 4.1.3 below). This is then used in the planning balance relating to the heritage national planning policy tests in the **Planning Statement** (Doc Ref. 7.1) submitted alongside the DCO application. This Heritage Harm Statement therefore includes the following:

- The legislative and planning policy framework context for the assessment.
- A summary of the results of the Environmental Impact Assessment (EIA) which is presented in **ES** (Doc Ref. 6.1) to establish those heritage assets affected by the Scheme and resultant harm (impact) to their significance.
- For those assets where there is potential for that harm to be substantial, a statement of harm is provided to explain the potential scale of the harm.

- A conclusion as to whether substantial harm is caused.
- Table 3-1 presents the level of harm for each designated heritage asset affected by the Scheme.

1.1.4. The EIA and methodology used to undertake the assessment relating to Cultural Heritage is presented in **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1)

2. Legislation, Planning Policy and Guidance

2.1. The Infrastructure Planning (Decisions) Regulations 2010 (as amended)

2.1.1. The Infrastructure Planning (Decisions) Regulations 2010 (as amended)[1] apply to the determination of DCO applications under the Planning Act 2008. Regulation 3 requires the Secretary of State to have regard to the following when deciding an application:

- For an application which affects a listed building or its setting, the Secretary of State 'must have regard to the desirability of preserving the listed building or its setting or any features of special architectural or historic interest which it possesses'.
- For an application relating to a conservation area, the Secretary of State 'must have regard to the desirability of preserving or enhancing the character or appearance of that area'.
- For an application for development consent which affects or is likely to affect a scheduled monument or its setting, the Secretary of State 'must have regard to the desirability of preserving the scheduled monument or its setting'.

2.2. Overarching National Policy Statement (NPS) for Energy (EN-1)

2.2.1. NPS EN-1[2] (adopted January 2026) outlines national policy for energy infrastructure. The statement provides the definition of the historic environment and information on appropriate levels of assessment of energy proposals that have the potential to impact upon the historic environment.

2.2.2. Paragraph 5.9.14 states that the applicant should ensure that the extent of the potential impact on the significance of any heritage asset as a result of the scheme must be adequately understood from the application and supporting documents. The applicant is also encouraged where opportunities exist to make a positive contribution to the historic environment through options such as

[1] HMSO (2010) Infrastructure Planning (decisions) Regulations 2010.

[2] Department of Energy, Security & Net Zero (DESNZ) (2025a) Overarching National Policy Statement for Energy (EN-1).

sensitive design, public benefits and enhanced access or interpretation (paragraph 5.9.15).

2.2.3. EN-1 states (paragraph 5.9.19) "Where the loss of the whole or part of a heritage asset's significance is justified, the Secretary of State will require the applicant to record and advance understanding of the significance of the heritage asset before it is lost (wholly or in part). The extent of the requirement should be proportionate to the asset's importance and significance and the impact." Where deemed appropriate the SoS will impose requirements on the Development Consent Order to ensure that the required works are undertaken in a timely manner, in accordance with a written scheme of investigation and the NPS policies. The scope of this work is to be agreed with the LPA (paragraph 5.9.20).

2.2.4. Paragraph 5.9.29 states that any development that may affect the significance of a heritage asset must give great weight to its conservation, with increasing weight for more important assets (paragraph 5.9.31). The policy makes clear that harm—whether substantial, total loss, or less than substantial—requires clear and convincing justification, and the Secretary of State must give considerable importance and weight to preserving heritage assets when weighing harm against the national need for energy infrastructure.

2.3. NPS for Renewable Energy Infrastructure (EN-3)

2.3.1. Within NPS EN-3 (adopted December 2025)[3] paragraph 2.3.8 states that when considering the impact on the historic environment and whether it is satisfied that the substantial public benefits would outweigh any loss or harm to the significance of a designated heritage asset, the SoS should take into account the positive role that large-scale renewable projects play in the mitigation of climate change, the delivery of energy security and the urgency of meeting the national targets for renewable energy supply and emissions reductions.

2.4. NPS for Electricity Networks Infrastructure (EN-5)

2.4.1. NPS EN-5 (adopted December 2025)[4] outlines the Government's policy statement in regard to electricity networks infrastructure. Paragraph 2.9.25 of the document requires that the potential effects of overhead lines and buried

[3] DESNZ (2025b) National Policy Statement for Renewable Energy Infrastructure (EN-3).

[4] DESNZ (2025c) National Policy Statement for Electricity Networks Infrastructure (EN-5)

cables on heritage assets are considered when developing and assessing the options. Paragraph 2.9.26 also determines that an overhead line will take preference over a buried cable unless it can be demonstrated that the benefit of a buried option clearly outweighs the extra economic, social or environmental impacts it presents.

2.5. National Planning Policy Framework

2.5.1. The National Planning Policy Framework (February 2025)[5] sets out guidelines for achieving sustainable development, based on the core objectives: economic, social, and environmental. Protecting and enhancing the historic environment is just one element contributing to the realisation of these objectives. Section 16 details the policies for protecting and enhancing the historic environment during planning procedure and decision making.

2.5.2. It states that any development decisions affecting heritage assets should be made with a thorough understanding of their significance, including any contribution made by their setting, with a level of detail proportional to their significance. In the case of a development affecting archaeological remains, a desk-based assessment and, where necessary, a field evaluation will be required (paragraph 207).

2.5.3. In the case of designated assets, substantial harm or loss to heritage assets and their settings should be exceptional for designated assets, including Grade II Listed Buildings and Grade II registered parks and gardens. Substantial harm to assets of the highest significance, including World Heritage Sites, Scheduled Monuments, Protected Wrecks, Registered Battlefields, Grade I and II* Registered Parks and Gardens, and Grade I and II* Listed Buildings, should be wholly exceptional (paragraph 213). Harm to these assets must be weighed against the public benefit of development (paragraph 214).

2.5.4. For non-designated heritage assets, a balanced judgement regarding the scale of harm or loss to the asset and its significance must be made (paragraph 216). Where development results in loss or harm to a heritage asset, developers will be required to record and advance understanding of the significance of the asset (paragraph 218).

[5] Ministry of Housing, Communities and Local Government (MHCLG) and Department for Levelling Up, Housing and Communities (2025) National Planning Policy Framework.

2.6. Planning Practice Guidance

2.6.1. Planning Practice Guidance (PPG)[6] provides further details on the interpretation of harm. Although relating to the policy outlined within the NPPF, it is transferable to the policy contained within the National Policy Statement for Energy as both require the same assessment with regard to the historic environment and apply the same planning tests.

2.6.2. PPG expands on terms such as 'significance' and its importance in decision making and also provides advice on how proposals can avoid or minimise harm to the significance of a heritage asset. The Guidance also covers the setting of heritage assets, how the setting can contribute towards the significance of a heritage asset and how the proposed scheme can interact with the setting of an asset. The guidance also provides advice on various other matters including;

- Whether the deteriorated state of a heritage asset should be taken into account in reaching a decision on an application
- What is the optimum viable use for a heritage asset and how is it taken into account in planning decisions
- How the possibility of harm to a heritage asset can be assessed.

2.7. Guidance

Historic England Advice Note 12: Statements of Heritage Significance

2.7.1. Historic England 'Advice Note 12: Statements of Heritage Significance'[7] provides guidance on the methods to describe heritage significance and how this can support the design process. This includes how archaeological desk-based assessments and field evaluations can support effective, consistent and timely design decisions.

[6] Ministry of Housing, Communities and Local Government (2019) Planning Practice Guidance.
7 Historic England (2019) Statements of Heritage Significance: Analysing Significance in Heritage Assets. Historic England Advice Note 12.

Historic England Advice Note 15: Commercial Renewable Energy Development and the Historic Environment

2.7.2. Historic England 'Advice Note 15: Commercial Renewable Energy Development and the Historic Environment[8]' outlines potential impacts on the historic environment as a result of renewable energy development including utility-scale solar PV generation, supporting the identification of potential heritage related issues.

Historic England Preserving Archaeological Remains: Decision-taking for Sites Under Development

2.7.3. Historic England 'Preserving Archaeological Remains: Decision-taking for Sites under Development' (2016)[9] describes measures to retain and protect archaeological remains beneath or within development, including the information necessary to ensure these have been fully considered as part of the cultural heritage impact assessment.

IEMA, CIfA and Institute of Historic Building Conservation (IHBC) (2021) Principles of Cultural Heritage Impact Assessment in the UK

2.7.4. IEMA, CIfA and IHBC 'Principles of Cultural Heritage Impact Assessment in the UK'[10] outlines a series of guiding principles and good practice measures for cultural heritage impact assessment in a variety of settings.

[8] Historic England (2021) Commercial Renewable Energy Development and the Historic Environment. Historic England Advice Note 15.

[9] Historic England (2015) Historic Environment Good Practice Advice in Planning Note 2. Managing Significance in Decision Taking in the Historic Environment

[10] IEMA (2021) Principles of Cultural Heritage Impact Assessment in the UK.

3. Methodology

3.1.1. All assets which have been identified as experiencing an adverse effect in the EIA have been considered within this document and are identified in Annex 1 of this report. Adverse effects can be experienced as a direct physical impact on historic fabric or as a result of changes to an asset's setting. Effects can also be experienced during the construction of the Scheme as short-term or long-term impacts, or as a result of the operation of the Scheme.

3.1.2. While there is no direct correlation between the significance of effect in EIA terms and the degree of harm referenced in national planning policy, it is acknowledged that those assets which are identified as experiencing a significant adverse effect are more likely to experience substantial harm. This Heritage Harm Statement, therefore, provides further assessment of those heritage assets where significant effects have been identified in order to understand where on the harm spectrum this impact falls. The emphasis is placed on the magnitude of impact for the purposes of this Heritage Harm Statement. This is consistent with the NPS' and the NPPF. 'Effect' is a primarily EIA term which balances the impact of a development with the heritage significance of an asset. Harm is associated with the impact on the asset and is not influenced by an asset's heritage value.

3.1.3. To inform the assessment of harm the magnitude of change to the cultural significance of an asset as a result of the Scheme is considered. Table 3-1 presents the criteria for the magnitude of impact as detailed in **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1) in comparison to the guidance set out in the national policies detailed in Section 2. Magnitudes of impact of major adverse may be considered substantial harm or less than substantial harm depending where in the spectrum of this impact category they are located.

Table 3-1: Criteria for Assessing Magnitude of Impact

Magnitude of Impact Criteria	Criteria for harm based National Policy and Guidance
Major Adverse Causes destruction, or change to most key elements, of the asset, resulting in substantial loss of integrity and cultural significance. Comprehensive change to the setting of the asset where this is a critical aspect of the assets cultural significance. Any such change would not normally be reversible.	Substantial Harm: Total or near-total permanent loss of the physical remains, their stratigraphic relationship or their evidential value. Less than substantial harm: A significant degree of change or to physical remains,

Magnitude of Impact Criteria	Criteria for harm based National Policy and Guidance
	stratigraphic relationships or evidential value, but falling short of total or near total loss.
Moderate Adverse Causes change to, or loss of many key elements of, the asset, which results in moderate loss of integrity and cultural significance. Moderate changes to the setting of the asset where this makes an important contribution to the cultural significance of the asset.	Less than substantial harm: A significant degree of change or loss to physical remains, stratigraphic relationships or evidential value, but falling short of total or near total loss.
Minor Adverse Change to some elements of the asset, which lead to a limited loss of integrity and cultural significance. Change to the setting of the asset where this makes a limited contribution to the cultural significance of the asset.	Less than substantial harm: A significant degree of change or loss to physical remains, stratigraphic relationships or evidential value, but falling short of total or near total loss.
Negligible/No Change No appreciable change to the cultural significance of the asset or its setting.	No harm

3.1.4. For the majority of heritage assets, the ES concludes that the predicted magnitude of impact would result in no more than a moderate adverse change to their cultural significance, due to the scale of the anticipated impact. As a result, it is concluded that the harm caused to these assets, both physically and within their setting, falls within the less than substantial category and at the lower level of Table 3-1, or that no harm is caused. As detailed in planning guidance and Historic England advice, a proportionate approach has been taken, and these assets are not discussed further. The reader is directed to **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1) for a full consideration of the impacts to heritage assets.

3.1.5. As substantial harm has been defined as the ***permanent*** loss of near total loss of the significance of a heritage asset, where an impact is temporary, either during construction or the lifetime of the Scheme, this is considered less than substantial harm. Details of temporary impacts have not been included in Annex 1 to this

Heritage Statement of Harm. For details of these impacts please see **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1).

3.1.6. This statement discusses harm in relation to designated assets and non-designated assets of archaeological interest, which are demonstrably of equivalent significance to Scheduled Monuments. Other non-designated assets are discussed in **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1).

3.1.7. This statement considers the cultural significance of the assets to enable an understanding of how the impact affects the heritage interests, including the contribution made by setting, of the assets. It establishes the degree to which assets will be physically impacted by the Scheme as well as the degree to which the setting of an asset will be impacted. The statement also provides a discussion of the impacts of the Scheme on the cultural significance or the ability to appreciate the cultural significance of the assets, taking into account embedded mitigation within the Scheme, and the resulting level of harm.

3.1.8. The conclusion outlines the level of harm to assets affected by the Scheme, in accordance with national planning policy and guidance.

4. Statement of Significance

4.1.1. The assessment of potential effects is reported within **ES Chapter 8: Cultural Heritage** (Doc Ref. 6-1). The ES demonstrates that impacts/harm is generally avoided or minimised, with no direct impacts to the buried archaeological deposits of Scheduled Monuments within the Solar Development Area and no direct harm to the fabric of Listed Buildings or Conservation Areas. Remaining harms are principally to setting, to non-designated archaeology or are temporary in nature. A summary of the assessment can be seen in Annex 1.

4.1.2. Two areas of archaeological deposits would be subject to a major adverse magnitude of impact due to the direct loss of archaeological significance resulting in a moderate adverse effect. These areas have been identified as experiencing permanent residual significant adverse effects on their heritage value following the implementation of appropriate mitigation:

- Potential Iron Age or Roman settlement activity in northern section of Field B-5.
- Archaeological deposits north of High Road. Potentially of Palaeolithic, Mesolithic, Iron Age, Roman, medieval or post-medieval date.

4.1.3. The area of archaeological deposits north of High Road would only be subject to a major adverse magnitude of impact if the Grid Connection Route is installed underground. If an overhead line is constructed, the effect on the buried archaeological deposits would not be significant.

4.1.4. An area of archaeological deposits within Archaeological Zone 1 is also considered to be of equal importance to the Scheduled Monument in accordance with footnote 75 of the NPPF[11] and will be subject to a moderate adverse magnitude of impact due to the direct loss of archaeological significance resulting in a moderate adverse effect.

4.1.5. Therefore, these three areas have been considered as part of this statement and their statements of significance are set out in the following paragraphs. The consideration of Harm is presented in Section 5.

[11] Ministry of Housing, Communities and Local Government (MHCLG) and Department for Levelling Up, Housing and Communities (2024) National Planning Policy Framework.

Potential Iron Age or Roman settlement in the northern end of Field B-5

4.1.6. At the northern end of field B-5, on the southern side of the South Holland main drain, the aerial photograph and geophysical surveys identified features likely to be of equivalent cultural significance to the archaeological deposits identified across the Solar Development Area. Two narrow roddons are recorded and features of likely Iron Age or Roman date have been recorded on one of these. The cultural significance of remains of Iron Age or Roman date in field B-5 are defined by their archaeological interest. Overall, the archaeological record contributes to the understanding of settlement, salt manufacturing, ritual activity, agriculture, and water management in the fenland region from the later prehistoric period into the Roman era. The archaeological deposits in the northern section of field B-5 are considered to be largely of medium importance as the areas of roddon are very limited therefore reducing the potential for archaeological deposits of high importance.

4.1.7. The ES has identified the potential for a permanent moderate adverse (significant) effect in the 400kV substation/compound footprints within the northern end of field B-5 arising from a major adverse impact on the buried archaeological deposits resulting in a moderate adverse effect. The assessment reduces the potential moderate adverse (significant) effect on this asset to a residual minor adverse (not-significant) effect following an appropriate programme of archaeological mitigation prior to construction. However, mitigation does not reduce the harm caused to the asset through loss of significance.

Archaeological deposits north of High Road

4.1.8. The aerial photograph survey and Historic Environment Record data collected to date indicates that the potential for archaeological remains decreases in this northern section of the Grid Connection Route when compared to the density of archaeological deposits recorded in other areas of the Scheme. The area is likely to have archaeological deposits of Palaeolithic, Mesolithic, Iron Age, Roman, medieval or post-medieval date. These deposits would hold cultural significance defined by their archaeological interest and have the potential to contribute to contribute to archaeological research into the development of agriculture and settlements, salt manufacturing, ritual activities and water management in the fenland region. Based on a worst-case assessment it is considered that archaeological deposits within this area would be of medium importance.

4.1.9. The Order Limits incorporate flexibility with regards to the final location of the Weston Marsh B Substation. Should the design require the Grid Connection

Route to be constructed underground between High Road and the Weston Marsh B Substation the impact on buried archaeological deposits would be greater than the impact of an overhead line (which would result in a residual effect of slight adverse). If required, the ES has identified that the undergrounding of the Grid Connection Route would result in a direct, major adverse magnitude of impact on any surviving archaeological deposits. Assuming these are of medium importance this would result in a permanent moderate adverse effect, which would be significant. The assessment reduces the potential moderate adverse (significant) effect on this asset to a residual minor adverse (not-significant) effect following an appropriate programme of archaeological mitigation prior to construction. However, mitigation does not reduce the harm caused to the asset through loss of significance.

Archaeological Zone 1

4.1.10. Archaeological Zone 1 is located in Land Parcels B and C. The zone contains the remains of Iron Age or Romano-British settlement and salt production sites as well as evidence of early medieval or medieval and post-medieval water management and agricultural practices. The desk-based research, and non-intrusive archaeological surveys, identified potential for extensive remains of Iron Age and/or Roman date to survive within the Solar Development Area. The earliest archaeological deposits identified through evaluation trenching are believed to be Iron-Age in date and have generally been located on the roddons crossing the Site. These areas of slightly raised ground would have provided a preferable location for settlement within the fenland landscape. Features identified across Archaeological Zone 1 are contiguous with those identified within Scheduled Monument 'Settlement NE of Whitebread Farm' (1004978) and Scheduled Monument 'Settlement W of Cate's Cove Corner' (1004979), extending beyond the scheduled areas and are therefore demonstrably of equivalent significance to the Scheduled Monuments. Together, the Iron Age and Roman remains reveal a landscape of long-term continuity and adaptation. The occupation pattern demonstrates the persistent exploitation of roddons as habitable spines within the fens, supporting mixed agricultural and domestic activity. The evolution from small, scattered Iron Age settlements to a more structured Roman landscape of enclosures, droveways, and managed drainage reflects both environmental adaptation and increasing social complexity. The cultural significance of remains of Iron Age or Roman date in the Solar Development Area is defined by their archaeological interest. Overall, the archaeological record contributes valuable insight into the development of settlement, salt manufacturing, ritual activity, agriculture, and water

management in the fenland region from the later prehistoric period into the Roman era. The potential for evidence of salt production also has the opportunity to contribute towards national research objectives to understand how salt production was undertaken during this period, how the salt was used and how it was transported from where it was sourced. Due to the complexity of the archaeological deposits identified, their valuable insight into the development of the fenlands and the association with the Scheduled Monuments, Archaeological Zone 1 are of high importance.

4.1.11. The ES has identified the potential for a permanent moderate adverse (significant) effect on non-designated archaeological deposits of archaeological interest, which are demonstrably of equivalent significance to Scheduled Monuments within Archaeological Zone 1 as a result of a moderate adverse impact on the deposits. The ES assessment reduces the potential moderate adverse (significant) effect on this asset to a residual minor adverse (not significant) effect following an appropriate programme of archaeological mitigation prior to construction. However, mitigation does not reduce the harm caused to the asset through loss of significance.

5. Harm Assessment

5.1. Potential Iron Age or Roman settlement in the northern end of Field B-5

5.1.1. The Scheme requires the construction of a 400kV substation and adjacent compound, access tracks and below ground cabling. The major adverse impact would be limited to the location of these elements as shown on **ES Figure 2-2** (Doc Ref. 6.2) and detailed in **ES Chapter 2: The Scheme** (Doc Ref. 6.1).

5.1.2. These works have the potential to disturb or remove any surviving archaeological remains within this footprint. Much of the archaeological interest of deposits outside of these specific construction footprints and beyond the Scheme boundary will be preserved therefore retaining their archaeological interest.

5.1.3. This physical impact on the asset as a result of the construction of the Scheme would slightly affect the ability to understand and appreciate the archaeological interest of these deposits when their extent is considered cumulatively. This will cause harm to the cultural significance of the buried archaeological deposits directly within the footprint of Scheme infrastructure, However, this would not result in total or near-total loss of the physical remains, their stratigraphic relationship or their evidential value and the archaeological deposits which extend between and beyond the footprint of the infrastructure and the Order Limits. As a result, that harm will be less than substantial, with the cultural significance of the asset not being significantly affected when considered in the context of the extent of the archaeological deposits and the wider historic landscape.

5.2. Archaeological deposits north of High Road

5.2.1. Should the Scheme require the Grid Connection Route to be constructed underground between High Road and the Weston Marsh B Substation the impact on buried archaeological deposits would be greater than the impact of an overhead line. The major adverse impact magnitude of impact would be limited to the extent of the underground line as detailed in the parameters set out in **ES Chapter 2: The Scheme** (Doc Ref. 6.1).

5.2.2. These works have the potential to disturb or remove the significance any surviving archaeological remains within this footprint. Much of the archaeological interest of deposits outside of these specific construction footprints and beyond

the Scheme boundary will be preserved therefore retaining their archaeological interest.

5.2.3. This physical impact on the asset as a result of the construction of the Scheme would slightly affect the ability to understand and appreciate the archaeological interest of these deposits when their extent is considered cumulatively. This will cause harm to the cultural significance of the buried archaeological deposits directly within the footprint of Scheme infrastructure, However, this would not result in total or near-total loss of the physical remains, their stratigraphic relationship or their evidential value and the archaeological deposits extend between and beyond the footprint of the infrastructure and the Order Limits. As a result, that harm will be less than substantial with the cultural significance of the asset not being significantly affected when considered in the context of the extent of the archaeological deposits within the wider archaeological context.

5.3. Archaeological Zone 1

5.3.1. The Scheme requires the construction of a 132kV substation and adjacent construction compound, access tracks, solar PV modules and below ground cabling within Archaeological Zone 1. At the locations to be used to accommodate a 132KV substation and adjacent construction compound, access tracks and below ground cabling there would be a greater magnitude of impact as a result of the more extensive ground disturbance required. These works have the potential to disturb or remove surviving archaeological remains within the footprint of the Scheme infrastructure. As a result, the impact would be limited to locations of these elements. Across the rest of Archaeological Zone 1 and through the wider extent of Parcels B and C, solar PV modules, supporting infrastructure and landscape mitigation are proposed and the impact would be less as archaeological deposits will be preserved *in situ* between the galvanised steel poles used to mount the solar PV modules and cable trenches. Any archaeological deposits extending outside of the Order Limits would also be preserved. The locations of these elements are shown on **ES Figure 2-2** (Doc Ref. 6-2) and detailed in **ES Chapter 2: The Scheme** (Doc Ref. 6.1).

5.3.2. This physical impact within Archaeological Zone 1 as a result of the construction of the Scheme would slightly affect the ability to understand and appreciate the archaeological interest of the asset. This will cause harm to the cultural significance of the asset but would not result in total or near-total loss of the physical remains, their stratigraphic relationship or their evidential value. As a result, that harm will be less than substantial with the cultural significance of buried archaeological deposits not being significantly affected when considered

in the context of the extent of the archaeological deposits and the wider historic landscape.

6. Conclusions

6.1.1. Both the NPS EN-1 and NPPF require an assessment of harm to heritage significance. Both also require the assessment to further categorise that harm into 'substantial' and 'less than substantial'. The PPG documents which support the heritage polices set out in NPPF expresses that potential harm to designated heritage assets to be categorised as either less than substantial harm or substantial harm. It also requires that the extent of the harm should be clearly presented within each category.

6.1.2. **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1) has identified effects to designated and non-designated assets because of the Scheme. Most of these effects can be reasonably equated with less than substantial harm.

6.1.3. The **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1) identifies a significant effect to:

- Potential Iron Age or Roman settlement activity in northern section of Field B-5.
- Archaeological deposits north of High Road.
- Archaeological Zone 1 where the 132kV substation, temporary compound access tracks and underground cabling are located.

6.1.4. **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1) also identifies residual effects following the implementation of additional mitigation measures where practicable. However, as detailed in NPS EN-1 paragraph 5.9.16, mitigation cannot be a factor in deciding if the identified harm should be permitted. As a result, the significance of the assets and the potential harm caused by the construction of the Scheme prior to mitigation have been presented in this statement.

6.1.5. In Field B-5 where the construction of a 400kV substation and adjacent compound, access tracks and below ground cabling is required, the Scheme will result in less than substantial harm to the cultural significance of the archaeological deposits within this area.

6.1.6. In the area north of High Road, should the Scheme require the Grid Connection Route to be constructed underground, the Scheme will result in less than substantial harm to the cultural significance of the archaeological deposits within this area.

6.1.7. Archaeological Zone 1 will be used for the construction of a 132kV substation and adjacent construction compound, access tracks, solar PV modules and below

ground cabling. The assessment has concluded that the Scheme will result in less than substantial harm to the cultural significance of archaeological deposits within Archaeological Zone 1.

7. Annex

7.1. Annex 1 – Effects as reported in Environmental Statement and Harm Category Assessment Summary

Receptor / Importance	Description of Impact (Magnitude of Impact)	Embedded Mitigation	Significance of Effect Without Additional Mitigation	Additional Mitigation/ Enhancement Measure	Residual Effect as reported in the ES	Harm category
Archaeological zone 1 (Land Parcel B and C) High	Moderate adverse impact by installation of 132kV substation, temporary compound, access tracks, solar PV modules and underground cabling.	Measures set out in the **OCEMP** (Doc Ref. 7.10). Scheduled Monument retained in agricultural use. 20m buffer around Scheduled Monument.	Permanent moderate adverse at 132kV substation, compound, access tracks, solar PV modules and underground cabling areas.	Measures to be set out in the OAMMS and AMMS informed by the results of the archaeological evaluation, including archaeological investigation in areas of 132kV substation, compound, access tracks and underground cabling.	Permanent minor adverse (not significant) effect at 132kV substation, compound, access tracks and underground cabling areas following mitigation. Unable to mitigate the effect of the solar PV modules and supporting infrastructure areas due to the limited potential to mitigate the galvanised steel poles used to support the PV modules, resulting in a permanent moderate adverse (significant) residual effect.	Less than substantial
Archaeological zone 2 (Land Parcel C)	Minor adverse by installation of solar PV modules,	Measures set out in the **OCEMP**	Permanent moderate adverse	Measures to be set out in the OAMMS and AMMS informed	Permanent moderate adverse (significant) effect on buried archaeological	Less than substantial

Receptor / Importance	Description of Impact (Magnitude of Impact)	Embedded Mitigation	Significance of Effect Without Additional Mitigation	Additional Mitigation/ Enhancement Measure	Residual Effect as reported in the ES	Harm category
High	supporting infrastructure and Inter-Array Connection in Field C-1-08.	(Doc Ref. 7.10).		by the results of the archaeological evaluation.	deposits due to the limited potential to mitigate the galvanised steel poles used to support the PV modules.	
Archaeological zone 3 (field B5). High	Moderate adverse impacts to archaeological deposits due to the installation of underground cabling to link to the 400kV substation and BESS compound.	Impact limited to the footprint of the cable trench and working area. Measures set out in the **OCEMP** (Doc Ref. 7.10).	Permanent moderate adverse on archaeological deposits in zone 3.	Measures to be set out in the OAMMS and AMMS informed by the results of the archaeological evaluation.	Permanent minor adverse (not significant) effect on buried archaeological deposits following mitigation.	Less than substantial
Potential Iron Age or Roman settlement activity on higher	Moderate adverse at locations to be used to accommodate the	Measures set out in the **OCEMP**	Permanent moderate adverse	Measures to be set out in the OAMMS and AMMS informed by the results of the	Permanent minor adverse (not significant) effect on buried archaeological	Less than substantial

Receptor / Importance	Description of Impact (Magnitude of Impact)	Embedded Mitigation	Significance of Effect Without Additional Mitigation	Additional Mitigation/ Enhancement Measure	Residual Effect as reported in the ES	Harm category
ground/roddons, including the path of a raised drove road or boundary ditch, in the northern end of Field B-5 Medium	400kV Substation and BESS Compound, a construction compound, access tracks and below ground cabling.	(Doc Ref. 7.10).		archaeological evaluation.	deposits following mitigation.	
Archaeological zones 4-8 in Land Parcel D. High	Minor adverse by installation of solar PV modules and supporting infrastructure.	Measures set out in the **OCEMP** (Doc Ref. 7.10).	Permanent moderate adverse	Measures to be set out in the OAMMS and AMMS informed by the results of the archaeological evaluation.	Permanent moderate adverse (significant) effect on buried archaeological deposits due to the limited potential to mitigate the galvanised steel poles used to support the PV modules.	Less than substantial
Areas of high archaeological potential for deposits of late prehistoric to Roman date	Minor adverse by installation of solar PV modules and supporting infrastructure.	Measures set out in the **OCEMP** (Doc Ref. 7.10).	Permanent moderate adverse	Measures to be set out in the OAMMS and AMMS informed by the results of the archaeological evaluation.	Permanent moderate adverse (significant) effect on buried archaeological deposits due to the limited potential to mitigate the galvanised steel poles	Less than substantial

Receptor / Importance	Description of Impact (Magnitude of Impact)	Embedded Mitigation	Significance of Effect Without Additional Mitigation	Additional Mitigation/ Enhancement Measure	Residual Effect as reported in the ES	Harm category
within the Solar Development Area (Land Parcels B, C and northern area of Land Parcel D) Medium					used to support the PV modules.	
Potential Neolithic or Bronze Age curvilinear ditches and enclosures in the Grid Connection Route (west of 4SV10 (GC_08); 4SV27 (GC_21); 4SV35 (GC_23)) Potential Palaeolithic or Mesolithic sedimentary	Moderate adverse from installation of pylons, working areas, drainage and access tracks; presence, movement and storage of temporary construction and plant equipment and materials.	Measures set out in the **OCEMP** (Doc Ref. 7.10).	Permanent moderate adverse	Measures to be set out in the OAMMS and AMMS informed by the results of the archaeological evaluation.	Permanent minor adverse (not significant) effect on buried archaeological deposits following mitigation.	Less than substantial

Receptor / Importance	Description of Impact (Magnitude of Impact)	Embedded Mitigation	Significance of Effect Without Additional Mitigation	Additional Mitigation/ Enhancement Measure	Residual Effect as reported in the ES	Harm category
sequences deeply buried in roddons or palaeochannels across the Grid Connection Route Medium						
Archaeological deposits north of High Road. Potentially of Palaeolithic, Mesolithic, Iron Age, Roman, medieval or post-medieval date. Medium	Major adverse from the potential undergrounding of the Grid Connection, working areas, drainage and access tracks; presence, movement and storage of temporary construction and plant equipment and materials.	Measures set out in the **OCEMP** (Doc Ref. 7.10).	Permanent moderate adverse	Measures to be set out in the OAMMS and AMMS informed by the results of the archaeological evaluation.	Permanent minor adverse (not significant) effect on buried archaeological deposits following mitigation.	Less than substantial

Receptor / Importance	Description of Impact (Magnitude of Impact)	Embedded Mitigation	Significance of Effect Without Additional Mitigation	Additional Mitigation/ Enhancement Measure	Residual Effect as reported in the ES	Harm category
Areas of medium archaeological potential within the Solar Development Area (Land Parcels A and D) Low	Minor adverse by installation of solar PV modules and supporting infrastructure.	Measures set out in the **OCEMP** (Doc Ref. 7.10).	Permanent slight adverse	Measures to be set out in the OAMMS and AMMS informed by the results of the archaeological evaluation.	Permanent slight adverse (not significant) effect on buried archaeological deposits due to the limited potential to mitigate the galvanised steel poles used to support the PV modules.	Less than substantial
Areas of low archaeological potential across all Land Parcels. Low	Minor adverse by installation of solar PV modules and supporting infrastructure.	Measures set out in the **OCEMP** (Doc Ref. 7.10).	Permanent slight adverse	Measures to be set out in the OAMMS and AMMS informed by the results of the archaeological evaluation.	Permanent slight adverse (not significant) effect on buried archaeological deposits due to the limited potential to mitigate the galvanised steel poles used to support the PV modules.	Less than substantial
Post fenland drainage and land management features are present across the	Minor adverse by installation of solar PV modules and supporting infrastructure.	None	Permanent slight adverse	None.	Permanent slight adverse (not significant) effect on buried archaeological deposits due to the limited potential to mitigate the	Less than substantial

Receptor / Importance	Description of Impact (Magnitude of Impact)	Embedded Mitigation	Significance of Effect Without Additional Mitigation	Additional Mitigation/ Enhancement Measure	Residual Effect as reported in the ES	Harm category
whole Solar Development Area Low					galvanised steel poles used to support the PV modules.	
The sites of four post-medieval farmsteads Low	Negligible adverse by installation of solar PV modules and supporting infrastructure.	None	Permanent slight adverse	Measures to be set out in the OAMMS and AMMS informed by the results of the archaeological evaluation.	Permanent slight adverse (not significant) effect on buried archaeological deposits due to the limited potential to mitigate the galvanised steel poles used to support the PV modules.	Less than substantial
The crash site of two Lancaster bombers in Land Parcel A Medium	Negligible adverse by installation of solar PV modules and supporting infrastructure.	Measures set out in the **OCEMP** (Doc Ref. 7.10).	Permanent slight adverse	Measures to be set out in the OAMMS and AMMS informed by the results of the archaeological evaluation.	Permanent slight adverse (not significant) effect on buried archaeological deposits due to the limited potential to mitigate the galvanised steel poles used to support the PV modules.	Less than substantial
The crash site of a British Spitfire	Minor adverse by installation of	Measures set out in the	Permanent slight adverse	Measures to be set out in the OAMMS	Permanent slight adverse (not significant) effect on	Less than substantial

Receptor / Importance	Description of Impact (Magnitude of Impact)	Embedded Mitigation	Significance of Effect Without Additional Mitigation	Additional Mitigation/ Enhancement Measure	Residual Effect as reported in the ES	Harm category
near or within Land Parcel A Medium	solar PV modules and supporting infrastructure.	**CEMP** (Doc Ref. 7.10).		and AMMS informed by the results of the archaeological evaluation.	buried archaeological deposits due to the limited potential to mitigate the galvanised steel poles used to support the PV modules.	
Areas of palaeoarchaeological potential are present across the whole Solar Development Area and the wider fens landscape. Medium	Minor adverse by installation of solar PV modules and supporting infrastructure.	None	Permanent slight adverse	None	Permanent slight adverse (not significant) effect on buried archaeological deposits due to the limited potential to mitigate the galvanised steel poles used to support the PV modules.	Less than substantial
Archaeological deposits along the line of the underground Inter-Array Connection	Moderate adverse from the installation of the underground Inter-Array Connection.	None	Permanent slight adverse	Measures to be set out in the OAMMS and AMMS informed by the results of the archaeological evaluation.	Permanent negligible adverse (not significant) effect on buried archaeological deposits following mitigation.	Less than substantial

Receptor / Importance	Description of Impact (Magnitude of Impact)	Embedded Mitigation	Significance of Effect Without Additional Mitigation	Additional Mitigation/ Enhancement Measure	Residual Effect as reported in the ES	Harm category
between Land Parcels A and B. Low						
Archaeological deposits along the line of the Overhead Inter-Array Connection between Land Parcels C and D. Medium	Negligible adverse from the installation of the overhead Inter-Array Connection.	None	Permanent slight adverse	Measures to be set out in the OAMMS and AMMS informed by the results of the archaeological evaluation.	Permanent negligible adverse (not significant) effect on buried archaeological deposits following mitigation.	Less than substantial
Areas of archaeological potential in fields containing 4SV3, 4SV4 and 4SV5 and 4SV27 of the Grid Connection Route Low	Moderate adverse from installation of pylons, working areas, drainage and access tracks; presence, movement and storage of temporary construction and	Measures set out in the **OCEMP** (Doc Ref. 7.10).	Permanent moderate adverse	Measures to be set out in the OAMMS and AMMS informed by the results of the archaeological evaluation.	Permanent slight adverse (not significant) effect on buried archaeological deposits following mitigation.	Less than substantial

Receptor / Importance	Description of Impact (Magnitude of Impact)	Embedded Mitigation	Significance of Effect Without Additional Mitigation	Additional Mitigation/ Enhancement Measure	Residual Effect as reported in the ES	Harm category
	plant equipment and materials.					
Areas of archaeological potential in fields containing the identified remains of linear drainage, ditches or cultivation marks, and a 19th century farmstead (MLI123190) Low	Moderate adverse from installation of pylons, working areas, drainage and access tracks; presence, movement and storage of temporary construction and plant equipment and materials.	None	Permanent moderate adverse	Measures to be set out in the OAMMS and AMMS informed by the results of the archaeological evaluation.	Permanent slight adverse (not significant) effect on buried archaeological deposits following mitigation.	Less than substantial