



The Great Grid Upgrade

Eastern Green Link 3 (EGL 3) and
Eastern Green Link 4 (EGL 4)

Preliminary environmental information report (PEIR)

Volume 2, Part 1, Appendix 2.7.A: Cultural Heritage EIA
Scoping Responses

May 2025

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Table 2.7.A-1 – Summary of Environmental Impact Assessment (EIA) Scoping Opinion responses for Cultural Heritage

Consultee	Consideration	How addressed in the PEIR
Planning Inspectorate	<p>Table 7-5 (Scoping Report), Direct physical effects on heritage assets outside the footprint of Proposed Development - construction:</p> <p>The Scoping Report states that no physical disturbance, damage, or alteration would arise to heritage assets and archaeological remains located outside the footprint of the onshore permanent infrastructure. In the absence of information such as archaeological remains likely to be found within the study area or evidence demonstrating clear agreement with relevant statutory bodies, the Inspectorate is not in a position to agree to scope this matter out from the assessment. The Environmental Statement (ES) should provide an assessment of direct physical impacts on heritage assets and archaeological remains during construction, including consideration for potential impacts that may affect the preservation state of adjacent remains, or provide the information referred to demonstrating agreement with the relevant consultation bodies and the absence of significant effects. Effects of changes to drainage on designated and non-designated heritage assets:</p> <p>The onshore elements of the Proposed Development have potential to alter the pattern of drainage within and adjacent to the boundary of works.</p>	<p>Consideration will be given to assessing impacts on assets outside the draft Order Limits caused by changes to drainage or other burial conditions. Other types of direct physical effects on heritage assets outside of the draft Order Limits will not occur. This will be assessed in the ES as information is not available at Preliminary Environmental Information Report (PEIR) stage.</p>

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	Impacts on heritage assets from alterations to drainage patterns, changes to groundwater flows and levels, and from the movement of contaminants or pollutants should be assessed, where significant effects are likely to occur. This should consider the potential for hydrological effects from both drying out and inundation. Cross references to the Water Environment ES Chapter should be considered.	
Planning Inspectorate	<p>Table 7-5, Temporary effects on setting of heritage assets - construction:</p> <p>The design and location of facilities such as the LCS Converter Station and the Walpole Station Area are not yet confirmed, and therefore the potential activities for these elements during construction or decommissioning are not yet defined. The Inspectorate does not agree to scope this matter out from the assessment. The ES should include an assessment of impacts on the setting of heritage assets during construction, or the information demonstrating agreement with the relevant consultation bodies and the absence of significant effects.</p>	<p>In consultation with the Local Planning Authorities (LPAs), it was agreed that the permanent effects on setting from the proposed Walpole B Substation and the converters will be assessed but that setting effects from the cable construction works are unlikely to be significant as effects are temporary. Historic England indicated that temporary access haul roads and compounds used in construction can sometimes be retained and become permanent as farmers continue to use them after construction, so they persist in the landscape. The information provided in the ES and as part of the Development Consent Order (DCO) application will clarify which access is temporary and/or permanent. Consideration will be given in the assessment to the setting effects from access roads where permanent.</p>
Planning Inspectorate	<p>Table 7-5, Direct physical impact on archaeological remains - operation, maintenance and decommissioning:</p> <p>The Inspectorate agrees that direct physical impacts to buried archaeological remains during operation, maintenance and</p>	<p>As any archaeological remains would have been mitigated via excavation and recording during construction, it is anticipated that no remains would therefore survive along the Indicative Cable Route or</p>

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	decommissioning are unlikely to result in significant effects however, the Scoping Report does not set out the activities which would be required under maintenance. The ES should set this information out, however, in the absence of this information, the Inspectorate is not content for this matter can be scoped out at this stage.	at the Walpole B Substation and converter stations, so do not require assessment. However, maintenance activities will be considered in the ES if they could lead to impact on assets which have not been removed during construction.
Planning Inspectorate	<p>Paragraphs 7.4.1 and 7.4.2, Study area:</p> <p>The ES should clearly define and justify the study area for designated and non-designated heritage assets, with reference to the potential Zol for the Proposed Development. Any use of professional judgement should be fully justified in the ES. Effort should also be made to agree the final study areas with relevant consultation bodies, e.g. Historic England and the host local authorities.</p>	Size of study area discussed at consultation meeting. Only Lincolnshire County Council (LCC) disagree. Additional information extending to 1 km from the draft Order Limits will be included, and it will not cover the 2 km requested by Lincolnshire County Council as this is not considered proportionate for a scheme of this nature. The English Onshore Scheme would be predominantly underground and therefore there are no operation effects caused by changes in the setting of heritage assets from the Indicative Cable Route. A wider area is considered around the substation and converter stations at Walpole.
Planning Inspectorate	<p>Paragraph 7.4.5, Zone of Theoretical Visibility (ZTV):</p> <p>The Scoping Report states that a ZTV will be developed to inform the final study areas chosen for the cultural heritage assessment and help to identify heritage assets that may experience visual impacts from the Proposed Development. The Inspectorate considers that assessment should be supported by appropriate visualisations such as photomontages to help illustrate the likely impacts of the Proposed Development. Effort should be made to agree appropriate viewpoint locations and such visualisations with relevant consultation bodies, including</p>	Visualisations will be discussed with relevant LPAs and Historic England, and in consultation with the Grimsby to Walpole Project to avoid duplication. These will be presented in the ES.

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	Historic England and host local authorities.	
Planning Inspectorate	<p>Paragraph 7.7.3, Archaeological surveys:</p> <p>The Applicant should ensure that the baseline information used to inform the assessment is robust and allows for suitable identification of assets likely to be impacted by the Proposed Development. Effort should be made to agree the need for, and scope/ location of intrusive investigations (paragraph 7.7.3 of the Scoping Report indicates that geophysical or trial trenching may be carried out) with relevant consultation bodies, including Historic England and the host local authorities. Consideration should be given to the use of boreholes and deposit modelling where more deeply buried remains are expected. Where necessary, intrusive investigations should be completed prior to submission of the DCO application and reported in the ES.</p>	Additional archaeological evaluation surveys are proposed and planned for the ES.
Planning Inspectorate	<p>Temporary effects on setting of heritage assets - decommissioning:</p> <p>The Scoping Report does not make reference to the impact of decommissioning activities on the setting of heritage assets. The ES should include an assessment of impacts on the setting of heritage assets during decommissioning, or the provide information demonstrating the absence of LSE and agreement with the relevant consultation bodies. The Applicant's attention is drawn to ID2.2.2 in relation to decommissioning.</p>	As outlined above, it was agreed with consultees that cable construction setting effects are unlikely to be significant. As a consequence, there are unlikely to be significant effects during any decommissioning. Table 4.21 in Volume 1, Part 1, Chapter 4: Description of the Projects provides a high level summary assessment of the likely significant effects associated with decommissioning.
Historic England	<p>Letter dated 23 August 2024</p> <p><i>"Volume 1, Part 2.1, Chapter 7 Cultural Heritage Paragraph 7.1.3 states that this chapter should be read in conjunction with other chapters within the Scoping Report. However, the chapters relating to the water environment (Chapter 9) or the</i></p>	<p>The Volume 1, Part 2, Chapter 9: Water Environment chapter and the Volume 1, Part 2, Chapter 10 Geology and Hydrogeology chapter will be read in conjunction with the Cultural Heritage chapter in the ES. It</p>

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	<p><i>geology and hydrogeology (Chapter 10) were not included in this list.</i></p> <p><i>We welcome the inclusion of HER data in the Scoping Report, but we recommend that the potential for previously unknown remains to be present is considered carefully in any subsequent PEIR produced. Parts of the proposed scheme area have not experienced intensive development in the past, such as the fens, marshes or river valleys, and so little may be known about the archaeological or palaeoenvironmental potential.</i></p> <p><i>...Environmental Statements can by their nature tend to lead to a somewhat atomised form of analysis, we welcome a narrative approach where professional judgement is clearly reflected in the reporting. In that context certain classes of feature may require particular attention, without prejudice to other assets, for example:</i></p> <ul style="list-style-type: none"> <i>• medieval moated sites and village earthworks;</i> <i>• former islands and causeways within the fen;</i> <i>• windmills;</i> <i>• prominent towers and church steeples rising from flatland against a wide sky and long views to distant asserts such as Tattershall Castle/Lincoln Cathedral, Boston St Botolph (Lincolnshire);</i> <i>• the mills, manor and church of St Wilfred at Alford (Lincolnshire); and</i> <i>• the churches of Walpole St Peter and Walpole St Andrew (Norfolk).</i> <p><i>We also direct the Applicant to sources such as the Ordnance Survey 1" maps of the first half of the 19th century prior to the loss of many features, tithe maps and surveys and historic publications such as The Book of Duck Decoys, their construction, management and history by Sir Ralph Payne-Gallwey (1886).</i></p> 	<p>is not possible to assess the potential effects and interactions between these topics at this PEIR stage</p> <p>Desk-based assessment, including map regression, Portable Antiquities Scheme data, results of other ongoing Nationally Significant Infrastructure Projects (NSIP) work, review of the rapid Coastal Zone Survey and the Fenland Survey, aerial investigation mapping survey and LiDAR will be undertaken to inform the Cultural Heritage chapter in the ES.</p> <p>Geophysical survey of the Indicative Cable Route, Walpole B Substation and converter stations will be undertaken to inform the Cultural Heritage chapter of the ES. Evaluation excavation will follow, to aid in the identification of impacts.</p> <p>Desk-based geoarchaeological assessment of the Indicative Cable Route, substation and converter stations will be undertaken in to inform the Cultural Heritage chapter of the ES.</p> <p>Heritage assets and archaeological remains out with the footprint of the English Onshore Scheme are assessed for dewatering impacts will be assessed within the Cultural Heritage chapter of the ES.</p>

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	<p>Measures to avoid impacts by design are highly desirable, such measures in a large and complex scheme rely upon best and soonest understanding of where such remains of sufficient importance to merit avoidance may lie. For this reason, the earlier that investigations can progress through Desk Based Assessment (DBA) including review of cartographic sources, lidar, aerial images etc to geophysical survey and targeted trial trenching the better for the efficient delivery of the proposed project.</p> <p>Portable Antiquities Scheme data and the results of other ongoing NSIP work such as Outer Dowsing Offshore Windfarm's electrical connection should be fully utilised.</p> <p>...The rapid Coastal Zone Survey and the Fenland Surveys are also key reference points.</p> <p>...In areas of alluvium and former marsh, geological homogeneity should not be assumed. The buried landscape is complex and rich, the better these multi-phase buried landscapes can be modelled through the integration of multiple data sources, the more closely and effectively archaeological interventions can be targeted to de-risk the construction process.</p> <p>...Table 7-5 summarises the likely significant cultural heritage effects caused by the proposed project that are to be scoped in or out. It is stated that there will be no direct physical effects on heritage assets and archaeological remains outwith the footprint of the English Onshore footprint, and so this issue has been scoped out of further assessments. We recommend that this impact is scoped in so that the DBA and preliminary deposit model allow for the potential for waterlogged deposits to be present in key parts of the proposed scheme area (e.g. fens). If</p>	

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	<p>construction activities result in changes to the local groundwater levels, there is the potential that these effects may be felt outside of the red line boundary for the scheme. If this occurs it can result in changes to the conditions of an archaeological site, which in turn could result in the damage and/or loss of organic archaeological remains.</p>	
Lincolnshire County Council	<p>Letter dated 23 August 2024</p> <p><i>“Consultation with the stakeholders should be on-going throughout the EIA process to ensure appropriate outcomes...500m ‘is deemed to be an appropriate distance from the Scoping Boundary to describe the historical and archaeological baseline, and to undertake an assessment of archaeological potential...Our standard guidance for undertaking large schemes in Lincolnshire states that HER data for a 2km radius is required from the redline boundary and includes any proposed options.</i></p> <p><i>...Mitigation requires enough baseline evidence for site-specific mitigation measures to be deployed effectively in an appropriate and reasonable way...The shallowness or otherwise of surviving archaeology does not necessarily affect its significance...On a scheme such as this we would expect to see an iterative programme of evaluation tied in to the refinement of cable route options.</i></p> <p><i>... A full competent LiDAR and air photo analysis, interpretation and assessment is required with full aerial photo coverage using all available oblique and vertical air photos including the Historic England Archive, what Cambridge University Collection of Air Photos (CUCAP) are available as well as RAF and Ordnance Survey photos including those held by LCC.</i></p> <p><i>... Geoarchaeological assessment is now standard on large schemes... Geophysical survey must be</i></p>	<p>The size of the study area was discussed at a consultation meeting. Only Lincolnshire County Council disagree. Additional information to 1 km will be included, and it will not cover the 2 km requested by Lincolnshire County Council as this is not considered proportionate for a scheme of this nature. The English Onshore Scheme would be predominantly underground and therefore there are no operation effects caused by changes in the setting of heritage assets from the Indicative Cable Route. A wider area is considered around the substation and converter stations at Walpole.</p> <p>Geophysical survey of the Indicative Cable Route, Walpole B Substation and converter stations will be undertaken to inform the Cultural Heritage chapter of the ES. Evaluation excavation will follow, to aid in the identification of impacts.</p> <p>Desk-based geoarchaeological assessment of the Indicative Cable Route, substation and converter stations will be undertaken to support the assessment within the Cultural Heritage of the ES.</p>

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	<p><i>undertaken of the full redline boundary including any options until they have been selected or descoped... emerging regional guidance requiring 3 – 5% trenching.. The EIA will require the full suite of comprehensive desk-based research, non-intrusive surveys, and intrusive field evaluation for the full extent of proposed impact.</i></p> <p><i>... With regard to the Assessment of Heritage Significance, Table 7-6, LCC are of the opinion that historic landscape character areas should also be part of this assessment. We expect to see historic landscape character areas represented separately in this table.”</i></p>	<p>Historic landscape features are already included in Table 7-6 of the Scoping Report.</p>
Norfolk County Council	<p>Letter dated August 2024:</p> <p><i>“... geophysical survey is undertaken at a point evolution of the scheme where the results of geophysical survey can also be used to inform design decisions alongside exiting baseline data. This applies especially to the converter stations.</i></p> <p><i>Historic England’s Aerial Archaeology Mapping Explorer is not a live dataset and has been stripped of accompanying interpretative information contained within HER records and is therefore unsuitable for use in relation to any form of development-led archaeology. Aerial Investigation Mapping (hereafter AIM) plot data should have been requested when HER data was obtained. A quick check indicate there has not been Historic England funded AIM (formerly NMP) survey of the Eastern Grenn Links 3 and 4 swathe in Norfolk.... Analysis of Environment Agency Light Detection And Ranging (LiDAR) and satellite imagery. This needs to be in specialist project specific AIM survey. Adherence to the standard for development-led archaeological projects in Norfolk is also</i></p>	<p>Geophysical survey of the Indicative Cable Route, Walpole B Substation and converter stations will be undertaken to inform the Cultural Heritage chapter of the ES.</p>

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	<p><i>required...Any DBA produced in relation to this scheme needs to contain and take into account data from a project specific Aerial Investigation Mapping survey carried out by a recognised specialist. The AIM survey will need to examine all existing physical and digital aerial images including Norfolk Air Photo Library collections (which can be accessed via our HER team), the Historic England Archive collection in Swindon and Environment Agency LiDAR data. Digital source include Google Earth, Bing and Apple Maps (See section 5.1.2 of the Standards for Development-Led Archaeology in Norfolk). The Cambridge University Collection of Aerial Photography (CUCAP) is still closed for physical searches, some images are available online."</i></p>	

Bibliography

There are no sources in the current document.

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