

**The Great Grid Upgrade**

Eastern Green Link 5 (EGL 5)

# Preliminary Environmental Information Report

Volume 1

Part 2

Chapter 7 Cultural Heritage

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nationalgrid

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# 7. Cultural Heritage

## 7.1 Introduction

- 7.1.1 This chapter presents the preliminary findings of the Environmental Impact Assessment (EIA) undertaken to date for the Eastern Green Link (EGL) 5 English Onshore Scheme, with respect to cultural heritage. The preliminary assessment is based on information obtained to date. It should be read in conjunction with the description of the Project provided in **Volume 1, Part 1, Chapter 4: Description of the Project**.
- 7.1.2 Cultural heritage comprises a diverse range of elements that are referred to throughout the chapter as heritage assets. Heritage assets consist of a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage assets include designated heritage assets and non-designated heritage assets identified by the local planning authority (including local listing). Heritage assets comprise World Heritage Sites, Scheduled Monuments, Listed Buildings, Registered Parks and Gardens, Registered Battlefields, Conservation Areas, buried archaeological remains, other historical buildings, and earthworks.
- 7.1.3 This chapter describes the methodology used, the datasets that have informed the preliminary assessment, current baseline conditions, current environmental measures, and the preliminary cultural heritage effects that could result from the English Onshore Scheme during the construction, operation (and maintenance), and decommissioning phases. Specifically, it relates to the English Onshore elements of the Scheme landward of Mean Low Water Springs (MLWS).
- 7.1.4 This chapter should be read in conjunction and considered alongside the following technical aspect chapters found in **Volume 1**:
- **Part 1, Chapter 4: Description of the Project** due to the close association between the Projects' design and impacts to heritage assets;
  - **Part 2, Chapter 6: Biodiversity** as the onshore elements will require hedgerow removal. The impacts to historic hedgerows and landscape character will be assessed in combination with biodiversity impacts as part of the assessment.
  - **Part 2, Chapter 8: Landscape and Visual Amenity** as the landscape and visual assessment will be used to inform the cultural heritage assessment regarding visual effects on terrestrial heritage features;
  - **Part 2, Chapter 9: Water Environment** as the onshore elements of the Project have potential to alter the pattern of drainage within and adjacent to draft Order Limits. Any changes could impact on heritage assets from alterations to drainage patterns, changes to groundwater flows and levels, and from the movement of contaminants or pollutants;
  - **Part 2, Chapter 10: Geology and Hydrology** as the geology and hydrology assessment will be used to inform the terrestrial cultural heritage and archaeology assessment as the geology and ground conditions affects what type of historic environment remains are likely to survive and how the landscape was utilised in the past;

- **Part 2, Chapter 13: Noise and Vibration** due to the potential for changes in the noise and vibration to affect archaeological remains, this chapter will be used to inform the terrestrial cultural heritage and archaeology assessment; and
- **Part 3, Chapter 25: Marine Archaeology** as there will be interaction between the cultural heritage and marine archaeology assessments, in the location of the landfall and the intertidal area.

7.1.5 This chapter is supported by the following figures in **Volume 3**:

- **Part 2, Figure 7.1: Cultural Heritage Study Area;**
- **Part 2, Figure 7.2: Heritage Assets;** and
- **Part 2, Figure 7.3: LiDAR Interpretation.**

7.1.6 This chapter is supported by the following appendices in **Volume 2**:

- **Part 1, Appendix 2.A: Regulatory and Planning Context;**
- **Part 1, Appendix 5.A: Outline Register of Design Measures;**
- **Part 1, Appendix 5.B: Outline Code of Conduction Practice;**
- **Part 2, Appendix 7.A: Cultural Heritage Scoping Responses;**
- **Part 2, Appendix 7.B: Cultural Heritage Baseline;**
- **Part 2, Appendix 7.C: Cultural Heritage Gazetteer;** and
- **Part 2, Appendix 7.D: Cultural Heritage Non-significant impacts.**

## Limitations

- 7.1.7 The information provided in this Preliminary Environmental Information Report (PEIR) is preliminary, with the final assessment of significant effects to be reported in the Environmental Statement (ES). The PEIR has been produced to fulfil National Grid Electricity Transmission plc (NGET)'s consultation duties in accordance with Section 42 of the PA2008 and enable consultees to develop an informed view of the preliminary significant effects of the English Onshore Scheme.
- 7.1.8 This assessment is based on preliminary desk-based research and site visits to assess potential effects caused by changes to key heritage assets. It cannot, therefore, be taken as a definitive statement of the potential presence and significance of archaeological remains within the draft Order Limits. Baseline analysis is ongoing, and further surveys are proposed to refine the assessments made through existing knowledge and to allow informed assessment of the potential effects of the English Onshore Scheme. These include, but are not limited to, desk-based geoarchaeological assessment, geophysical survey and archaeological evaluation.
- 7.1.9 Light detection and ranging (LiDAR) data was obtained from the Department for Environment, Food and Rural Affairs (Defra) to identify additional heritage assets. Project specific LiDAR is not yet available but will be reviewed for the ES when produced.
- 7.1.10 Aerial photographic analysis using data from Historic England is ongoing and has not been included within this assessment. However, the results will be incorporated into the ES.

7.1.11 The English Onshore Scheme has been assessed on the principal that environmental measures (refer to **Volume 1, Part 1, Chapter 5: PEIR Approach and Methodology** for further details) have been ‘embedded’ into the design to mitigate potential significant effects. This approach is informed by the iterative design process. Additionally, the English Onshore Scheme would ensure that standard good practice construction measures are adopted, through the implementation of an Outline Code of Construction Practice (CoCP) (**Volume 2, Part 1, Appendix 5.B: Outline Code of Construction Practice (CoCP)**). The preliminary appraisal of potential effects therefore assumes that both embedded design mitigation and good practice measures are in place.

## Preliminary significance conclusions

7.1.12 For ease of reference, a summary of the potentially significant effects from the preliminary cultural heritage assessment is provided in **Table 7-1**. All other effects in relation to cultural heritage have been assessed as not significant. Further details of the methodology behind the assessment, and a detailed narrative of the assessment itself are provided within the sections below. All heritage assets are shown in **Volume 3, Part 2, Figure 7-2**. Heritage assets within the draft Order Limits that have been discovered through cartographic research, LiDAR survey, or geophysical survey have not been assessed as their nature and value is still to be determined through intrusive archaeological investigations.

7.1.13 The sensitivity/importance/value of a receptor is defined using the criteria set out in Section 7.9 and is defined as negligible, low, medium, high, and very high.

7.1.14 The magnitude of change on a receptor resulting from activities relating to the development is defined using the criteria set out in Section 7.9 and is defined as (negligible, low, medium and high).

7.1.15 The significance of the environmental effects is based on the combination of the significance/value of a receptor and the magnitude of impacts and is expressed as major (significant), moderate (potentially significant) or minor/negligible (not significant), subject to the evaluation methodology outlined in Section 7.9.

Table 7-1 Preliminary summary of significance of effects

Heritage asset and summary of predicted effects	Heritage value of asset	Magnitude of impact	Significance	Summary rationale
Romano-British Settlement (MLI116296)	Medium	Medium	Moderate adverse	The indicative zone for the underground cable would cross the site of the settlement remains. Direct physical impacts to the heritage asset would be permanent.

## 7.2 Relevant Technical Guidance

7.2.1 The legislation and planning policy which has informed the assessment of effects with respect to cultural heritage is provided within **Volume 2, Part 1, Appendix 2.A: Regulatory and Planning Context**. Further information on policies relevant to the English Onshore Scheme is provided in **Volume 1, Part 1, Chapter 2: Regulatory and Policy Overview**. Relevant technical guidance, specific to cultural heritage, which has informed this PEIR and will inform the assessment within the ES is summarised below.

### Technical guidance

7.2.2 A summary of the technical guidance for cultural heritage is given in **Table 7-2**.

Table 7-2 Technical guidance relevant to the cultural heritage assessment

Technical guidance document	Context
Planning Practice Guidance: Environment (2019) (Ref 7.1).	Historic This guidance provides advice on the conservation and enhancement of cultural heritage.
Historic England Good Practice Advice in Planning Note 2 (GPA 2): Significance in decision-taking in the Historic Environment (2015) (Ref 7.2).	This document provides guidance and information to assist in implementing cultural heritage policy and ensuring compliance with National Planning Policy Framework (NPPF) fundamentals.
Historic England Good Practice Advice in Planning Note 3 (GPA 3): The Heritage Assets (2017) (Ref 7.3).	Sets out guidance on managing change within the settings of heritage assets. The document sets out five steps to follow to ensure an appropriate level of assessment is achieved.
Chartered Institute for Archaeology (2021) Principles of Cultural Heritage Impact Assessment in the UK (Ref 7.4).	This document provides guidance for cultural heritage practitioners in regard to the principles of cultural heritage impact assessments. These are: A. understanding cultural heritage assets; and B. evaluating the consequences of change.
Institute of Sustainability and Environmental Professionals (ISEP, formerly the Institute of Environmental Management and Assessment (IEMA)) (2024) Impact Assessment Guidance (Ref 7.5).	Sets out key principles and direction to ensure that environmental mitigation identified during the pre-application assessment process (including design and EIA) is delivered once consent has been granted.
Historic England Statements of Heritage Significance: Analysing Significance in Heritage Assets (2019) (Ref 7.6).	This Historic England advice note covers the NPPF requirement for applicants for heritage and other consents to describe heritage significance to help local planning authorities to make decisions on the impact of proposals for change to heritage assets.

Technical guidance document	Context
Chartered Institute for Archaeologists (CIfA) Standard and guidance for archaeological desk-based assessments. desk-based assessment (2020a) (Ref 7.7).	Sets out standards to produce archaeological desk-based assessments.
CIfA Standard and guidance for commissioning work or providing consultancy advice on archaeology and the historic environment (2020b) (Ref 7.8).	Sets out standards for the provision of consultancy advice in the historic environment.

## 7.3 Consultation and Engagement

### Overview

- 7.3.1 The assessment has been informed by consultation responses and ongoing stakeholder engagement. An overview of the approach to consultation is provided in Section 5.9 of **Volume 1, Part 1, Chapter 5: PEIR Approach and Methodology**.

### Scoping opinion

- 7.3.2 **Volume 2, Part 2, Appendix 7.A: Cultural Heritage Scoping Responses** outlines the comments made in the Scoping Opinion in relation to cultural heritage and how these have been addressed within this PEIR.
- 7.3.3 The information provided in the PEIR is preliminary and not all of the Scoping Opinion comments have been addressed at this stage. However, all comments will be addressed within the ES.
- 7.3.4 Technical engagement with consultees is ongoing, and **Table 7-3** below is a summary of the engagement undertaken to date. A technical working group related to cultural heritage is currently being set up to ensure regular communication with Historic England, Lincolnshire County Council and other stakeholders.

Table 7-3 Technical engagement on the environmental aspect assessment

Consultee	Consideration	How addressed in this PEIR
Lincolnshire County Council	Letter 30th September 2025. Lincolnshire County Council provided comments on the information provided within the EIA Scoping Report.	Comments from Lincolnshire County Council will be addressed within the PEIR and any outstanding matters will then be addressed within the ES chapter (see Volume 2, Part 2, Appendix 7.A: Cultural Heritage Scoping Responses)
Historic England	Letter 29th September 2025. Historic England provided comments on the information provided within the EIA Scoping Report.	Comments from Historic England will be addressed within the PEIR and any outstanding matters will then be addressed within the ES chapter (see Volume 2, Part 2, Appendix 7.A: Cultural Heritage Scoping Responses)

Consultee	Consideration	How addressed in this PEIR
East Lindsey Council	Letter 30th September 2025. East Lindsey Council provided comments on the information provided within the EIA Scoping Report.	Comments from East Lindsey Council will be addressed within the PEIR and any outstanding matters will then be addressed within the ES chapter (see Volume 2, Part 2, Appendix 7.A: Cultural Heritage Scoping Responses)

## 7.4 Data Gathering Methodology

### Study area

- 7.4.1 The Study Areas for the assessment of potential significant effects on cultural heritage have been defined through consideration of the nature of the English Onshore Scheme, which is principally the connection of the subsea High Voltage Direct Current (HVDC) cable to the Transition Joint Bay (TJB) at the landfall, via HVDC underground cable from the TJB to the converter station, and via High Voltage Alternating Current (HVAC) underground cable from the converter station to the proposed (as part of the Grimsby to Walpole project) 400 kV Lincolnshire Converter Station-B (LCS-B).
- 7.4.2 Study Area A extends 500 m from the English Onshore Scheme draft Order Limits, within which all elements of the English onshore scheme are located. This is deemed to be an appropriate distance from the English Onshore Scheme draft Order Limits to describe the historical and archaeological baseline and to undertake an assessment of archaeological potential. In addition, data will be considered in Study Area B up to 1 km from the English Onshore Scheme draft Order Limits to provide additional archaeological context but will not be described in detail. This study area has been set out for consistency with the Eastern Green Link 3/4 projects, following the results of consultation related to the onshore elements of that scheme. The heritage assets within this wider area will only be used to enhance the baseline where necessary and will be presented in **Volume 2, Part 2, Appendix 7.C: Cultural Heritage Gazetteer**.
- 7.4.3 The converter station is the only above ground element of the English Onshore Scheme that is considered within the assessment at this stage. The link pillars and Transition Joint Bay (TJB) are not anticipated to be higher than 1 m from ground level and would not impact upon heritage assets due to changes within their setting. Due to its dimensions and characteristics when operational an Extended Study Area has been defined to identify receptors which may be impacted through changes within their setting. Extended Study Area A is set at 1 km from the CS05 converter station siting zone and will consider impacts due to changes within the setting of designated and non-designated heritage assets. Extended Study Area B is set at 3 km from the Indicative zone for the converter station and will consider impacts due to changes within the setting of designated heritage assets. Any heritage assets outside of the study areas which have a setting that extends within it will also be considered. However, only heritage assets where setting contributes to their significance shall be considered within these Extended Study Areas.
- 7.4.4 The Study Areas and Extended Study Areas are shown in **Volume 3, Part 2, Figure 7-1**.
- 7.4.5 Consultation with stakeholders will be undertaken to identify heritage assets outside of Extended Study Area B, where their significance may be affected through changes within their setting. Any heritage assets identified will be included in the assessment for the ES.

- 7.4.6 The Study Areas will be reviewed and amended in response to any refinement of the English Onshore Scheme draft Order Limits; desk and site-based analysis, including the development of a Zone of Theoretical Visibility (ZTV); the identification of additional impact pathways; and through ongoing consultation.
- 7.4.7 The assessment will be supported by appropriate visualisations, such as photomontages, to help illustrate the likely impacts of the English Onshore Scheme. These will be agreed with the relevant consultees, including Historic England and the local authorities and will be produced as part of the landscape assessment (**Volume 1, Part 2, Chapter 8: Landscape and Visual Amenity**).

## LIDAR

- 7.4.8 For LiDAR assessment, Study Area A was considered for the identification of anomalies. LiDAR data was downloaded from the Department for Environment, Food and Rural Affairs (Defra) in the form of 1 m resolution Digital Terrain Model (DTM) tiles covering Study Area A, each grid covering 10 km area. These were merged to form a continuous model across Study Area A. Additionally, a Simple Local Relief Model (SLRM) for Study Area A was generated. SLRM was generated using the Relief Visualisation Toolbox on Quantum Geographic Information System (QGIS). This process ‘filters out’ terrain surfaces leaving otherwise discrete archaeological features and their relative elevation above or below the surrounding terrain.
- 7.4.9 Features of archaeological origin or potential within the draft Order Limits, or that may have elements that are likely to extend into the draft Order Limits, such as agricultural earthworks, moats and palaeochannels, have been mapped in QGIS as shapefiles, using WSP’s in-house Remote Sensing Mapping Polygon, and have been added to the relevant gazetteer. This mapping tool for the transcription of archaeological features have been informed by Historic England guidance to retain consistency and represents best practice (Historic England 2019). Additionally, where potential features aligned with pre-existing features recorded within the HER or historic mapping, the relationship was noted.

## Desk study

- 7.4.10 A summary of the organisations that have supplied data, together with the nature of that data is outlined in **Table 7-4**.

**Table 7-4 Data sources used to inform the cultural heritage assessment**

Organisation	Data source	Data provided
Historic England	National Heritage List for England (NHLE).	Information on statutorily designated heritage assets.
Lincolnshire County Council	Lincolnshire Environment Record (HER).	Information on non-designated heritage assets.
Local councils and Historic England	Lincolnshire Conservation Areas data.	Information on Conservation Areas.
Lincolnshire County Council	Lincolnshire Character Areas.	Information on changes in land use and management.

Organisation	Data source	Data provided
Historic England	Regional Framework East Midlands Updated Framework 2012.	Research Information on the significant archaeology in the East Midlands.
Historic England	Regional Framework East of England Updated Framework 2021.	Research Information on the significant archaeology in the East of England.
Groundsure	Historic Ordnance Survey (OS) mapping.	Information on historical mapping.
Historic England	Historic England's Archaeology Explorer; Historic England Archive Service for aerial photograph data.	Information on aerial mapping photographs.
Department for Environment, Food and Rural Affairs	Department for Environment, Food and Rural Affairs Data Download.	LiDAR 1 m DTM (digital terrain survey model) data.

## Survey work

- 7.4.11 In October 2025, an intertidal walkover survey took place, to visually inspect the area and record any visible heritage assets.
- 7.4.12 A targeted walkover survey of the route of the English Onshore Scheme was undertaken during December 2025, to visually inspect the area and allow understanding of the relevant landscape character areas.

## 7.5 Overall Baseline

- 7.5.1 The following section provides a summary baseline. Full details are provided in **Volume 2, Part 2, Appendix 7.B: Cultural Heritage Baseline**. Further details of heritage assets discussed below are contained in **Volume 2, Part 2, Appendix 7.C: Cultural Heritage Gazetteer** and shown in **Volume 3, Part 2, Figure 7-2** and **Volume 3, Part 2, Figure 7-3**. Heritage asset numbers provided throughout this chapter are either numbers from the Historic Environment Record (e.g. MLI125181), from WSP analysis of LiDAR (e.g. LiDAR\_150) or from the National Heritage List for England (e.g. NHLE 101917). In addition, heritage asset numbers AEC300, AEC301 and AEC303 are from the Grimsby to Walpole Preliminary Environmental Information Report (Ref 7.9).

### Draft Order Limits

- 7.5.2 There are 51 heritage assets recorded from the NHLE, HER, LiDAR survey, and noted from cartographic sources within the draft Order Limits, comprising:
- One designated heritage asset (Grade II listed Stain Glebe Farm);
  - 22 non-designated heritage assets which consist of;
    - Two heritage assets dating to the Roman period;

- 17 heritage assets dating to the medieval period;
- Two post-medieval heritage assets;
- One undated heritage asset;
- Three heritage assets recorded in the Grimsby to Walpole Preliminary Environmental Information Report (Ref 7.12), (AEC300, AEC301, AEC303);
- Two heritage assets identified from cartographic sources; and
- 23 heritage assets identified by LiDAR.

## Study Area A (500 m from the draft Order Limits)

7.5.3 There are 66 designated heritage assets within Study Area A. These comprise:

- Four Scheduled Monuments: Castle Hill motte and bailey castle, Castle Carlton (NHLE 1016783), Churchyard Cross, St Margarets Churchyard Saleby (NHLE 1014426), and Churchyard Cross, Holy Trinity churchyard (NHLE 1014425), and Moated site immediately west of Hall Farm (NHLE 1019070);
- Three Grade I Listed Buildings: Church of St Wilfrid, Alford (NHLE 1063026), Church of All Saints (NHLE 1063692), and Alford Windmill (NHLE 1146936);
- Three Grade II\* Listed Buildings: Alford Manor House, West Street (NHLE 1063001), Hanby Hall, 15 Church Street (NHLE 1308757), and Church of the Holy Trinity (NHLE 1360007);
- 55 Grade II Listed Buildings; and
- One Conservation Area, Alford Conservation Area (4519).

7.5.4 There are a further 126 non-designated heritage assets that include, but are not limited to, various earthwork features dating to the medieval and post-medieval period, the site of medieval settlements and various post-medieval dwellings, and heritage assets relating to the Second World War.

## Study Area B (between 500 m and 1 km from the draft Order Limits)

7.5.5 There are 22 designated heritage assets within study Area B, comprising:

- Two Scheduled Monuments: Markby Priory (NHLE 1004987) (the remains of a 13<sup>th</sup> century priory) Moated site immediately west of Hall Farm (NHLE 1019070) (the remains of a medieval moated manor site);
- One Grade I Listed Building, Church of St Margaret (NHLE 1360009);
- One Grade II\* Listed Building, Church of St. Edith (NHLE 1308718); and
- 18 Grade II Listed Buildings.

7.5.6 There are a further 78 non-designated heritage assets, that include, but are not limited to, the site of medieval settlements, various earthworks features dating to the medieval and post-medieval periods, and post-medieval residential properties.

## Indicative Zone for the Converter Station

- 7.5.7 There are no designated heritage assets located within the Indicative Zone for the converter station. There are two non-designated heritage assets located within the Indicative Zone for the converter station, comprising one find spot (MLI41472) and one boundary ditch (LiDAR\_049).

## Extended Study Area A

- 7.5.8 There are no designated heritage assets located within the Extended Study Area A. There are 19 non-designated heritage assets located within the Extended Study Area A, comprising four earthworks, one moated site, two settlement sites, one deserted medieval village, one tramway, nine farm buildings, and one dwelling.
- 7.5.9 There are a further 14 non-designated heritage assets, three of which were identified by geophysical survey, and 11 identified by LiDAR, seven of which date to the post-medieval period and four are undated.

## Extended Study Area B

- 7.5.10 There are 59 designated heritage assets located within the Extended Study Area B, comprising:
- Two Scheduled Monuments: Markby Priory (NHLE 1004987), and Churchyard Cross, Holy Trinity Churchyard (NHLE 1014425).
  - Four Grade I Listed Buildings: Church of St Margaret (NHLE 1360009), Alford Windmill (NHLE 1146936), Church of St Wilfrid (NHLE 1063026) and Church of St Andrew (NHLE 1147204);
  - Three Grade II\* Listed Buildings: Alford Manor House, West Street (NHLE 1063001), Hanby Hall, 15 Church Street (NHLE 1308757), and Church of the Holy Trinity (NHLE 1360007);
  - 49 Grade II Listed Buildings; and
  - One Conservation Area, Alford Conservation Area (DLI10532).

## Future baseline

- 7.5.11 Large parts of the study area comprise arable land and some degradation of extant earthworks and shallowly buried archaeological deposits may be expected to occur over the lifetime of the English Onshore Scheme, although the condition of any remains is unlikely to be significantly altered before the start of the construction period. This could include the partial or total loss of known or potential buried archaeological resources within the draft Order Limits or known above-ground heritage assets within the study area as a consequence of land being disturbed or developed.
- 7.5.12 Effects caused by changes within the setting of designated heritage assets may occur in the future from new development.

## 7.6 Environmental Measures

- 7.6.1 As set out in **Volume 1, Part 1, Chapter 5: PEIR Approach and Methodology**, the environmental measures are characterised as design measures or control and

management measures. A range of environmental measures would be implemented as part of the English Onshore Scheme and will be secured in the DCO as relevant. In addition, **Volume 2, Part 1, Appendix 5.A: Outline Register of Design Measures** and **Volume 2, Part 1, Appendix 5.B: Outline Code of Construction Practice (CoCP)** provide detail on environmental commitments.

- 7.6.2 **Table 7-5** outlines how these design and control measures will influence the cultural heritage assessment. In addition to the measures listed in **Table 7-5**, standard mitigation measures, comprising management activities and techniques, would be implemented during the construction of the Project to limit effects through adherence to good site practices and achieving legal compliance.

Table 7-5 Summary of environmental measures

Receptor	Potential changes and effects	Environmental measures	ID Reference
<b>Construction</b>			
Designated heritage assets	Disturbance of, or removal of heritage assets could result in a direct effect resulting from loss of archaeological interest.	All designated heritage assets will be avoided during construction.	CH01 (C)
Non-designated heritage assets	Disturbance of, or removal of, heritage assets could result in a direct effect resulting from loss of archaeological interest.	<p>Selection of the Indicative Zone for the Underground Cable Route has been undertaken to avoid, as far as possible, identified areas of greater archaeological potential.</p> <p>Limiting land take within the draft Order Limits to only that required to construct, operate and maintain the English Onshore Scheme – to minimise disturbance to buried archaeology.</p> <p>Limiting stripping for construction compounds, haul roads, and other associated works in areas where archaeology is recorded to avoid disturbance.</p> <p>Plant access to work sites would use existing access routes as far as possible to minimise disturbance and preclude compaction of archaeological remains. Trackways would be used for access where possible and appropriate to preclude disturbance or compaction of archaeological deposits.</p> <p>Locations of known archaeological interest/value, or areas where archaeological work is planned, would be signposted/fenced off to avoid unintentional damage.</p> <p>A programme of archaeological works, which will be secured through a requirement in the DCO, would be undertaken in areas of impact to ensure buried archaeological remains are preserved by record, proportionate to their importance. The exact methodology at each site would be discussed with the relevant consultees, but may include archaeological excavation or areas of strip, map and record.</p>	CH02 (C)

Receptor	Potential changes and effects	Environmental measures	ID Reference
Designated assets	heritage Change to setting arising from visibility of the English Onshore Scheme can give rise to an effect arising through loss of or harm to historic and architectural interests.	Access works would use existing routes where possible, and new routes would be reinstated on completion, reducing perceptual change to the historic landscape.	CH03 (C)
Historic character	landscape Change in historic landscape character arising from visibility of the English Onshore Scheme could give rise to direct potential significant effects through harm to historic interests of heritage assets.	Access would, as far as possible, use existing tracks, minimising the extent to which new routes across the landscape would appear. Temporary accesses would be removed and reinstated following the completion of the construction/dismantling works. Any sections of hedgerow which are removed along the Indicative Zone for the Underground Cable Route would be reinstated.	CH04 (C)
Hedgerows	Lengths of hedgerows would be removed to facilitate the development proposals, with the potential to cause direct potentially adverse effects on these heritage assets and historic landscape character more widely.	The Contractor(s) would retain vegetation where practicable and in accordance with the Landscape and Ecological Management Plan (LEMP). Where sections of hedgerow are removed, and are ecologically worth preserving, they would be removed in sections, retaining intact root balls where possible and maintained accordingly to prolong longevity and viability (for example through watering). This would speed up the restoration process.  Where vegetation is lost and trees cannot be replaced in situ due to the restrictions associated with land rights required for operational safety, suitable native planting approved by NGET would be used as a replacement, in accordance with the outline vegetation reinstatement plans included within the LEMP. Where possible, replacement tree planting would be undertaken at the closest suitable location to area of loss.	MT02 (C)

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## Design and Operation

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Receptor	Potential changes and effects	Environmental measures	ID Reference
Designated assets	heritage Effects to the significance of the heritage asset through change to its setting.	<p>Selection of Indicative Zone for the Underground Cable Route and detailed consideration of the English Onshore Scheme's placement has been undertaken to avoid direct physical impacts on designated heritage assets and to minimise change to setting.</p> <p>Planting (once established) to visually screen elements of the English Onshore Scheme, for example the converter station, to reduce potential adverse effects on the setting of heritage assets. Details of any landscape planting will be detailed within the Landscape and Ecological Management Plan.</p>	CH01 (D)
Historic character	landscape Change in historic landscape character arising from visibility of the English Onshore Scheme could give rise to direct potentially significant effects through harm to historic interests of heritage assets.	Selection of Indicative Cable Route and detailed consideration of the placement of the English Onshore Scheme has been undertaken to avoid, as far as possible, and to minimise change to sensitive historic landscape features.	CH02 (D)

## 7.7 Scope of the Assessment

### Spatial scope and study area

- 7.7.1 The spatial scope of the assessment of cultural heritage covers the area of the English Onshore Scheme contained within the draft Order Limits, together with the study areas described in Section 7.4.
- 7.7.2 Study Area A extends 500 m from the draft Order Limits, within which all the components of the English Onshore Scheme would be located. This is deemed to be an appropriate distance from the draft Order Limits to describe the historical and archaeological baseline, and to undertake an assessment of archaeological potential. An extended study area was defined to a maximum distance of 3 km from the above ground components, such as the indicative zone for the converter station siting as this is the maximum distance at which they would have the potential to form a sufficiently prominent part of a view to give rise to potentially significant adverse effects in the landscape context of the study area.
- 7.7.3 Non-visual perceptual change in setting (e.g. changed sound/noise environments) is anticipated to be restricted to very close proximity of the English Onshore Scheme, and as a result would not have a bearing on the maximum extent of the Extended Study Area.
- 7.7.4 Effects have been considered during the construction, operation and decommissioning periods.

### Temporal scope

- 7.7.5 The temporal scope of the assessment of cultural heritage is consistent with the period over which the English Onshore Scheme would be carried out. As detailed in **Volume 1, Part 1, Chapter 4: Description of the Project**, it covers the period 2029 – 2035 for construction, and the lifetime of the Project for operation (expected to operate for 40 years, although likely extended through replacement and repair).
- 7.7.6 The English Onshore Scheme is expected to have a minimum life span of approximately 40 years. If decommissioning is required at this point in time, then activities and effects associated with the decommissioning phase are expected to be of a similar level to those during the construction phase works, albeit with a lesser duration of two years. Acknowledging the complexities of completing a detailed assessment for decommissioning works up to 40 years in the future, it is considered that the significance of effects relating to the decommissioning phase would be no greater than those from the construction phase and decommissioning effects are not discussed in detail in this chapter; however, **Table 4-19 in Volume 1, Part 1, Chapter 4: Description of the Project** provides a high level summary assessment of the likely significant effects associated with decommissioning. Furthermore, should decommissioning take place it is expected that an assessment in accordance with the legislation and guidance at the time of decommissioning would be undertaken.

### Identification of receptors

- 7.7.7 The principal cultural heritage receptors that have been identified as being potentially subject to significant effects are summarised in **Table 7-6** and are shown in **Volume 3, Part 2, Figure 7-2**.

Table 7-6 Cultural heritage receptors subject to potential significant effects

Receptor	Reason for consideration
Designated heritage assets and non-designated historic buildings.	<p>Potentially significant effects arising from the construction of the English Onshore Scheme could include change to setting (and consequently change to the character of Conservation Areas) resulting from visibility of the proposed converter station.</p> <p>Noise and other perceptual change arising from the construction or operation of the English Onshore Scheme could result in perceptual change of the setting of heritage assets.</p>
Buried archaeological remains.	<p>Potentially significant direct effects arising from the construction of the English Onshore Scheme could include the disturbance or removal of archaeological remains by intrusive groundworks and the disturbance or dewatering of deposits of palaeoecological or geoarchaeological interest.</p>
Historic Landscape Character.	<p>Change may arise to historic landscape character in areas of construction of new infrastructure as a result of the loss or modification of landscape features, the introduction of new features, or a change to the perception of the use or appearance of parts of the landscape.</p>

### Potential effects considered within this assessment

7.7.8 The effects on cultural heritage receptors which have the potential to be significant and have been taken forward for detailed assessment are summarised in **Table 7-7**.

Table 7-7 Cultural heritage receptors scoped in further assessment

Phase	Impact	Receptor	Likely significant effects
Construction	Subsurface impacts from land preparation (earthworks, excavation).	Designated and non-designated assets.	Potential effects from permanent loss of archaeological remains.
Construction	Physical impacts to elements of the historic landscape, such as hedgerows, causes by land preparation (earthworks, excavation).	Historic Landscape Character.	Potential effects from temporary loss of historic landscape elements.

Phase	Impact	Receptor	Likely significant effects
Construction	Direct physical impacts on heritage assets and archaeological remains out with the footprint of the English Onshore Schemes permanent infrastructure caused by changes in drainage levels.	Designated and non-designated assets.	Potential effects from permanent loss of archaeological remains.
Operation	Visual impacts of all above-ground infrastructure on the setting of heritage assets.	Designated and non-designated assets.	Potential for effects through change to setting caused during operation.
Operation	Visual impacts on historic landscape character by all above-ground infrastructure.	Historic Landscape Character.	Potential for effects from perceptual change to historic landscape.

7.7.9 The receptors/effects detailed in **Table 7-8** have been scoped out from being subject to further assessment because the potential effects are not considered likely to be significant.

**Table 7-8 Summary of effects scoped out of the cultural heritage assessment**

Phase	Receptors/ potential effects	Justification
Construction	The temporary effects on designated and non-designated heritage assets; landscape character arising through change to setting.	Temporary effects arising through change to setting during the historic construction phase are not deemed to be significant as once the construction works are complete, any impacts will be removed.
Operation	Designated and non-designated heritage assets during land preparation.	Archaeological remains within the draft Order Limits would have been removed, following appropriate mitigation, during the construction phase.
Maintenance	Designated and non-designated heritage assets; landscape character during repairs.	Archaeological remains within the draft Order Limits would have been removed, following appropriate mitigation, during the construction phase.

Phase	Receptors/ potential effects	Justification
Decommissioning	Designated and non-designated heritage assets; historic landscape character during demolition and excavation.	Archaeological remains within the draft Order Limits would have been removed, following appropriate mitigation, during the construction phase.

## 7.8 Key Parameters for Assessment

### Realistic worst-case design scenario

- 7.8.1 This assessment has followed the Rochdale Envelope approach as outlined in **Volume 1, Part 1, Chapter 4: Description of the Project** and **Volume 1, Part 1, Chapter 5: PEIR Approach and Methodology** of the PEIR. The assessment of effects has been based on the description of the Project and parameters outlined in **Volume 1, Part 1, Chapter 4: Description of the Project**. However, where there is uncertainty regarding a particular design parameter, the realistic worst-case design parameters are provided below with regards to cultural heritage, along with the reasons why these parameters are considered worst-case. The preliminary assessment for cultural heritage has been undertaken on this basis. Effects of greater adverse significance are not likely to arise should any other development scenario, based on details within the Rochdale Envelope (e.g., different infrastructure layout within the draft Order Limits), to that assessed here be taken forward in the final design scheme.
- 7.8.2 In relation to cultural heritage, the following assumptions are made regarding the Projects design parameters in order to ensure a realistic worst-case assessment has been undertaken.
- With regards to the converter station height, it is assumed that the maximum building height is 30 m and the assessment has been done on this basis. The converter station height may be reduced. In addition, the converter station platform would be 1.7 m from the existing ground level. A full description of the converter station can be found in **Volume 1, Part 1, Chapter 4: Description of the Project**.
  - Overnight, external lighting would be installed on the perimeter of the converter station, for safety and security purposes and to facilitate maintenance or repair works during the hours of darkness or low light.
  - It is assumed that there is a potential for the disturbance of archaeological remains anywhere within the draft Order Limits. However, not all areas would be impacted e.g. areas of horizontal direction drilling (which would be below the depths of archaeological remains), so later assessment will consider where impacts are avoided through construction techniques once verified.
  - Proposed planting to mitigate visual effects of the converter station would be in place during the operation of the English Onshore Scheme, although it is noted that this would take time to mature.

## Consideration of construction scenarios

- 7.8.3 As detailed in **Volume 1, Part 1, Chapter 4: Description of the Project**, the timing of construction activities set out within this PEIR is indicative. It has been identified that elements of the Project could be constructed sequentially or concurrently. Providing that the required archaeological mitigation detailed in **Table 7-5** is undertaken in one phase as part of the enabling works, there is no significant difference in effects should elements of the Project be constructed concurrently or sequentially (as detailed in **Volume 1, Part 1, Chapter 4: Description of the Project**) with regards to potential impacts upon cultural heritage.

## 7.9 Assessment Methodology

### Overview

- 7.9.1 The generic project-wide approach to the assessment methodology is set out in **Volume 1, Part 1, Chapter 5: PEIR Approach and Methodology**, and specifically in Sections 5.4 to 5.6. However, whilst this has informed the approach that has been used in this cultural heritage assessment, it is necessary to set out how this methodology has been applied, and adapted as appropriate, to address the specific needs of this cultural heritage assessment. Details are provided below.

### Heritage Value

- 7.9.2 The heritage significance of a heritage asset is the product of the value it holds for this and future generations resulting from its historic, archaeological, architectural or artistic interests.
- Historical interest - through association with past events or past people; or where a heritage asset is illustrative of a particular asset type, theme or period;
  - Archaeological interest - through the potential to hold evidence about the past that can be retrieved through specialist investigation; and
  - Architectural/Artistic interest - through value derived from contemporary appreciation of a heritage asset's aesthetics.
- 7.9.3 NPS EN-1 (Ref 7.11) notes that setting contributes to a heritage asset's significance but does not provide an explicit definition of setting. Setting is defined in the NPPF (Ref 7.12) and Historic England's Good Practice in Planning Note (GPA3) (Ref 7.3) as: "*The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate an asset, or may be neutral.*"
- 7.9.4 For the purposes of the cultural heritage and archaeology assessment, the heritage significance or value of an asset will be assigned to one of four classes, with reference to the heritage interests described above and professional judgement informed by policy and guidance (**Table 7-2, Table 7-3** and **Table 7-4**). In particular, NPS EN-1 distinguishes between the heritage significance of designated and non-designated heritage assets. To align with other workstreams in this assessment, significance is referred to as a receptor's 'heritage value' in **Table 7-9**.

Table 7-9 Assessment of heritage value

Value	Heritage asset description
Very High.	World Heritage Sites. Designated heritage assets of international importance.
High	Scheduled Monuments. Grade I Listed Buildings. Grade II* Listed Buildings. Grade II Listed Buildings with exceptional qualities in fabric, historical association, and/or association/group value with heritage assets of high significance. Protected wrecks. Registered Battlefield. Conservation Areas containing very important (Grade I / II*) Listed Buildings. Grade I and II* Registered Parks and Gardens. Protected heritage landscapes (e.g. ancient woodland or historic hedgerows, heritage Sites of Special Scientific Interest). Burial grounds. Non-designated heritage assets (above ground structures, landscape, townscape, buried remains) of national importance.
Medium	Grade II Listed Buildings which can be shown to have qualities in their fabric or historical association of regional importance only. Conservation Areas containing primarily Grade II listed or locally Listed Buildings. Grade II Registered Parks and Gardens. Locally Listed Buildings. Non-designated heritage assets (above ground structures, landscape, townscape, buried remains) of regional importance.
Low	Non-designated heritage assets (above ground structures, landscape, townscape, buried remains) of local importance.
Negligible	Item with no significant heritage value or interest.
Uncertain	Heritage assets that have clear potential, but for which current knowledge is insufficient to allow significance to be determined.

## Magnitude of impact

- 7.9.5 The assessment of the magnitude of impact (i.e. change) is the identification of the degree of the impact of the English Onshore Scheme on the heritage assets. There is no standard scale of comparison against which the severity of potential effects on heritage assets may be judged, because of the great variety of resources and heritage assets, but it is based on the deviation from baseline conditions. The assignment of a magnitude of impact is a matter of professional judgement and is summarised in **Table 7-10**.

- 7.9.6 The magnitude of impact can be influenced by several factors:
- The permanence of the impact (temporary, permanent, or reversible);
  - Physical changes caused by the impact (positive or adverse); and
  - The extent of the asset or its setting that would be affected and contribution of that part to its heritage significance.
- 7.9.7 The effects of change within the setting of a heritage asset depends on the contribution of setting to the heritage significance of the heritage asset, and assessments must be by their nature, specific to the individual heritage assets being considered. Heritage significance is a qualitative measure of value and any assessments of impact will be drawn from professional judgement exercised within a context defined by statute, policy and guidance.
- 7.9.8 All assessments will be presented as a narrative, setting out the nature and extent of the impact to a heritage asset's significance arising from the English Onshore Scheme, the permanence of the impact, whether positive or negative, before assigning those impacts a magnitude as set out in **Table 7-10**.
- 7.9.9 Impacts can be beneficial or adverse. NPS EN-1 (Ref 7.11) expects developers to make, where possible, a positive contribution or beneficial impact to cultural heritage.

**Table 7-10 Assessment of magnitude of impact**

<b>Impact</b>	<b>Adverse Criteria</b>	<b>Beneficial Criteria</b>
High	Change to most or all key archaeological materials or key elements of an historic building, such that the resource is totally altered. Comprehensive changes to setting.	Preservation of a heritage asset in situ where it would otherwise be completely or almost lost. Changes that appreciably enhance the cultural significance of a heritage asset and how it is understood, appreciated, and experienced.
Medium	Changes to many key archaeological materials or key historic building elements, such that the resource is clearly modified. Considerable changes to setting that affect the character of the asset.	Changes to important elements of a heritage asset's fabric or setting, resulting in its cultural significance being preserved (where this would otherwise be lost) or restored. Changes that improve the way in which the heritage asset is understood, appreciated, and experienced.
Low	Changes to key archaeological materials or key historic building elements, such that the asset is slightly altered. Slight changes to setting.	Changes that result in elements of a heritage asset's fabric or setting detracting from its cultural significance being removed. Changes that result in a slight improvement in the way a heritage asset is understood, appreciated, and experienced.

Impact	Adverse Criteria	Beneficial Criteria
Negligible	Very minor changes to archaeological materials or historic building elements, or setting.	Very minor changes that result in elements of a heritage asset's fabric or setting detracting from its cultural significance being removed.  Very minor changes that result in a slight improvement in the way a heritage asset is understood, appreciated, and experienced.
No Change	Changes to fabric or within the setting that leave cultural significance unchanged	Changes to fabric or within the setting that leave cultural significance unchanged

## Significance of effect

- 7.9.10 The classification of the significance of an impact is judged by the relationship of the magnitude of change to the assessed heritage significance of an asset (**Table 7-11**). Table 7-11 varies slightly from Table 5-3 in **Volume 1, Part 1, Chapter 5: PEIR Approach and Methodology**, as it reflects the nuanced differences within the cultural heritage assessment process.
- 7.9.11 It is generally accepted that major and moderate effects are considered to be significant, while minor and negligible effects are considered to be not significant. However, professional judgement will be applied, and this may be amended as appropriate.
- 7.9.12 All assessments will be presented as narrative descriptions that set out the significance of a heritage asset, including, where appropriate, the contribution of its setting to significance, anticipated magnitude of change to significance, and a resulting significance of effect.

Table 7-11 Assessment of significance of effect

Heritage significance	Magnitude of impact			
	High	Medium	Low	Negligible
<b>Very High</b>	Major (significant)	Major (significant)	Major Moderate (potentially significant)	or Minor (not significant)
<b>High</b>	Major (significant)	Major or Moderate (potentially significant)	Moderate Minor (potentially significant)	or Minor (not significant)
<b>Medium</b>	Major Moderate (potentially significant)	or Moderate (potentially significant)	Minor (not significant)	(not Minor Negligible (not significant))

Magnitude of impact					
<b>Low</b>	Moderate Minor (potentially significant)	or	Minor (not significant)	or	Negligible (not significant)
<b>Negligible</b>	Minor significant)	(not	Minor Negligible significant)	or	Negligible (not significant)

## Assessment of harm and substantial harm

- 7.9.13 Harm and substantial harm are distinguished in NPS EN-1. For this assessment, adverse change of negligible to medium magnitude to a designated asset or a non-designated asset of equivalent heritage significance would normally be considered as less than substantial harm, while a high magnitude of adverse change would normally be considered substantial harm. This follows the case of *Hall vs City of Bradford* 2019 (Ref 7.13) that determined that even a negligible magnitude of change to a designated heritage asset would constitute harm. The fact that the harm may be limited or negligible will contribute to the weight to be afforded to it as part of the planning balance as recognised in NPS EN-1.
- 7.9.14 Professional judgement will be applied to the case of each individual asset and comments on the magnitude of any harm arising will be noted in the narrative of each assessment.

## Preliminary assessment of cumulative effects

- 7.9.15 At the current stage of the Project (PEIR stage), design information is insufficient to allow for a robust cumulative assessment to be undertaken. Furthermore, given the current position in relation to baseline data collection, with much of the environmental surveys still to be undertaken during 2026, the baseline identified at this PEIR stage cannot be taken as a complete picture of the potential presence and significance of sensitive receptors. Therefore, a cumulative assessment has not been undertaken at this stage. However, **Volume 1, Part 4, Chapter 27: Cumulative Effects** and **Volume 2, Part 4, Appendix 27.A: Long List of other Developments** present the long and short lists of 'other developments' for the inter-project cumulative effects which will be considered at the ES stage (with updates as necessary), and the methodology which allowed for the identification of these other developments, to allow consultation bodies to form a view and provide comment on the other developments included. The long-list will be reviewed and, if necessary, updated in the lead up to the ES, as the Project design further evolves and in response to any comments raised at statutory consultation.
- 7.9.16 Intra-project cumulative effects result principally from different types of impacts from one development acting in combination on a specific receptor. In this chapter, the following intra-project cumulative effects has been assessed - intra-project cumulative effects on heritage assets arising from noise, views, dust and traffic impacts during construction.
- 7.9.17 There may also be potential for intra-project cumulative effects to occur with other topics, such as hydrology or geology. However, at this stage of the English Onshore Scheme, data is insufficient to allow for an assessment to be undertaken. These will be considered in the ES.

## 7.10 Preliminary Assessment of Cultural Heritage Effects

- 7.10.1 Potentially significant effects on heritage assets are presented below. All impacts which are not considered to be significant are presented in **Volume 2, Part 1, Appendix 7.D: Cultural Heritage Non-significant impacts**. The impacts have been assessed with the environmental measures detailed in **Table 7-5** taken into account.
- 7.10.2 Impacts presented in this section are permanent construction phase effects, arising from the physical impact upon archaeological remains.
- 7.10.3 As detailed in Section 7.5 above, full details of heritage assets can be found in **Volume 2, Part 2, Appendix 7.C: Cultural Heritage Gazetteer** and shown on **Volume 3, Part 2, Figure 7-2** and **Volume 3, Part 2, Figure 7-3**. Heritage Asset numbers provided throughout this chapter are either numbers from the Historic Environment Record (e.g. MLI125181), from WSP analysis of LiDAR (e.g. LiDAR\_150) or from the National Heritage List for England (e.g. NHLE 101917).
- 7.10.4 All of the impacts present below are considered to be **significant**.

### Romano-British settlement (MLI116296)

- 7.10.5 The HER data notes the remains of a potential Romano-British settlement (MLI116296) within the draft Order Limits, located 580 m northeast of Alford. A magnetometry survey in 2014 recorded a concentration of rectilinear enclosures and associated ditch and pit-like anomalies towards the southern and western parts of the geophysical survey area. Trial trenching in 2015 confirmed the presence of an enclosure ditch and pit features and identified 3rd century pottery and animal bone. Analysis of environmental samples taken from the site indicate spelt wheat was being grown, which is indicative of traditional Roman agricultural practices. Excavations in 2021 revealed further enclosures and pits and a variety of pottery dating from the Late Iron Age to Late Roman periods. These remains have archaeological interest for their potential to inform the understanding of Romano-British agricultural and settlement patterns, and the heritage asset is therefore assessed as being of medium value.
- 7.10.6 The remains of the Romano-British settlement are partially located within the draft Order Limits and would potentially be directly physically impacted upon during construction for the cable installation. The magnitude of impact upon the settlement remains is medium as not all of the heritage asset remains may be removed. On a heritage asset of medium value, this results in a **significant** effect of **moderate** adverse.

## 7.11 Further Work to be Undertaken

- 7.11.1 The information provided in this PEIR is preliminary; the final assessment of potential significant effects will be reported in the ES. This section describes the further work to be undertaken to support the cultural heritage assessment presented in the ES.

### Baseline

- 7.11.2 Further assessment of the English Onshore Scheme is required. This would involve in the first instance additional desk-based research, including a survey of existing aerial investigation mapping, review of the Portable Antiquities Scheme data, review of additional project-specific LiDAR data (if available), analysis of historic mapping, and further documentary research, including but not limited to, Romano-British landscapes,

post-medieval landscapes and locally listed buildings/non-designated built heritage assets. A full desk-based assessment will be produced as part of the ES.

- 7.11.3 A geophysical magnetometry survey will be undertaken across the scheme in accordance with the Scoping Response from the Lincolnshire Council County Archaeologist, to determine the presence and extent of any archaeological remains.
- 7.11.4 These surveys will be followed by a programme of archaeological evaluation by trial trenching to be developed in consultation with the LPAs and, where relevant, Historic England, to further determine the presence and survival of potential archaeological remains, alongside any required geoarchaeological evaluation fieldwork.
- 7.11.5 Targeted site visits will be undertaken for key heritage assets, including those where further assessment of impacts caused by changes within the setting of heritage assets is required.

## Assessment

- 7.11.6 The assessments undertaken for the PEIR will be reviewed following stakeholder consultation feedback and further design refinement. The following assessments will then either be updated or undertaken where they have not been undertaken for this PEIR:
- Updated assessment of cultural heritage effects; and
  - Review of impacts caused by dewatering or changes in drainage that could affect the preservation of archaeological sites located outside of the Indicative Zone for Underground Cable Assets.

## Further environmental measures

- 7.11.7 Further consultation with relevant statutory consultees will be undertaken to define the scope and extents of the environmental measures required and detailed in Section 7.6 above. If, following stakeholder consultation feedback, further design refinement, and further assessment, it is identified that additional environmental measures are required, these will be detailed as part of the ES.

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