

The Great Grid Upgrade

Eastern Green Link 5 (EGL 5)

Preliminary Environmental Information Report

Volume 2

Part 2

Appendix 7.A Cultural Heritage Scoping Response

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nationalgrid

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Cultural Heritage EIA Scoping Responses

Table 7.A-1 Summary of Environmental Impact Assessment (EIA) scoping opinion responses for cultural heritage

Consultee	Consideration	How this is addressed in the PEIR
Planning Inspectorate	Tentative East Coast Flyway World Heritage Site (WHS): <i>“The applicant’s attention is drawn to NE’s comments regarding the location of the proposed development in the tentative East Coast Flyway WHS. The ES should set out the status of this potential receptor at the point of DCO application. Where significant effects are likely to occur to the receptor beyond those assessed for the individual international and national nature conservation site designations, the ES should provide an assessment and identify mitigation as needed.”</i>	The tentative East Coast Flyway World Heritage Site is located over 10 km from the English Onshore Scheme, and remains on the tentative list, rather than as a designation. It is also proposed for ecological factors rather than archaeological or heritage. If required, this will be considered within the ES chapter.
Planning Inspectorate	<p>The Scoping Report Paragraph (7.4.10) identifies that there are only two designated heritage assets (grade II listed buildings) located within the Scoping boundary and on the basis that these would be avoided in the final design, these are proposed to be scoped out.</p> <p>The Inspectorate notes that Figure 7-1 identifies three designated heritage assets that overlap with the red line boundary. On the basis that it is demonstrated in the final design proposed in the ES that physical impacts from land preparation to designated heritage assets within or adjacent to the footprint of the onshore scheme are avoided, the Inspectorate agrees to scope this matter out.</p>	All designated heritage assets will be avoided during construction. The only designated heritage asset within the draft Order Limits will be removed from the Order Limits in later design iterations to ensure avoidance.
Planning Inspectorate	<p>Direct physical impacts on heritage assets and archaeological remains beyond the footprint of the English Onshore Scheme permanent infrastructure (Construction phase):</p> <p>The Scoping Report states that no physical disturbance, damage, or alteration would arise to heritage assets and archaeological remains</p>	Consideration will be given to assessing impacts on heritage assets outside the draft Order Limits caused by changes to drainage or other burial conditions. Other types of direct physical impacts on heritage assets outside of the draft Order

Consultee	Consideration	How this is addressed in the PEIR
	<p>located outside the footprint of the onshore permanent infrastructure. Whilst the Inspectorate agrees that this may apply to designated heritage assets through avoidance (as addressed in ID 3.2.1 above), this does not explain how this would apply to any other heritage assets e.g. non-designated and archaeological assets, that may be outside of, but adjacent to the red line boundary.</p> <p>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 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.</p>	Limits will not occur. This will be assessed in the ES.
Planning Inspectorate	<p>Temporary effects during construction arising through change within the setting (Construction phase; applies to both designated and non-designated heritage assets and historic landscape character):</p> <p>Scoping Report states that onshore construction is anticipated to last up to 5 years however, impacts are stated to be temporary and therefore significant effects from the change in setting are not anticipated. However, some impacts such as construction of the substations would then continue into the operational phase. Additionally, although impacts may be temporary, the magnitude of effects is also dependent on the nature of change and the extent of the asset that would be affected. The Inspectorate agrees that this matter can be scoped out on the basis that any continuing impacts from construction that could potentially lead to LSE in the operational phase are assessed for the operational phase in the ES.</p>	Only impacts that will occur during construction and operation will be included in the PEIR and ES.
Planning Inspectorate	<p>Maintenance phase: Repairs to above ground infrastructure or buried cables (Maintenance phase; applies to designated and non-designated heritage assets and historic landscape character):</p>	Maintenance phase impacts are scoped out.

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	<p>The Inspectorate agrees that impacts to designated and non-designated heritage assets and historic landscape character from repairs to above ground and below ground cable infrastructure can be scoped out of further assessment based on the identified measures in Table 4-5.</p>	
<p>Planning Inspectorate</p>	<p>Direct physical impacts to designated and non-designated heritage assets and archaeological remains during construction within the footprint of the proposed development:</p> <p>Scoping Report Table 7-5 does not identify this as a potential impact to be scoped in although it states ‘heritage assets within the footprint of the English Onshore Scheme will have been removed’ within the table. Additionally, there are a number of identified above ground assets within the footprint of the proposed development, and it is unknown what archaeology is present at this stage.</p> <p>On this basis, the Inspectorate expects this matter to be scoped in. This should include all construction activities and not be limited to land preparation.</p>	<p>Table 7-6 scopes in potential changes and effects to designated and non-designated heritage assets and archaeological remains during construction within the footprint of the proposed development. An initial assessment of impacts is included within Volume 2, Part 2, Chapter 7: Cultural Heritage of the PEIR and in Volume 2, Part 2, Appendix 7.D: Cultural Heritage non-significant impacts.</p>
<p>Planning Inspectorate</p>	<p>Trial Trenching Areas:</p> <p>Scoping Report paragraph 7.7.3 identifies that trial trenching will be undertaken in ‘blank areas’ identified by geophysical and desk-based surveys. The applicant should also consider utilising trial trenching to validate findings of archaeological remains based on the geophysical and desk-based results.</p>	<p>Trial trenching is 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. Trial trenches will be set out to target geophysical and other anomalies, as well as blank areas.</p>
<p>Planning Inspectorate</p>	<p>Unexploded Ordnance (UXO) and possible disturbance is not mentioned in the Scoping Report for the onshore scheme. The ES should confirm through baseline characterisation whether there is potential to impact UXO and where this is the case, provide an assessment of significant effects or explain how such receptors would be avoided.</p>	<p>Volume 2, Part 2, Appendix 7.B: Cultural Heritage Baseline discusses the potential for UXO. Further consideration will also be given where required as part of the ES.</p>

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Alford Council	<p>Town Scoping Opinion for Eastern Green Link 5</p> <p>Scoping request 2.1 – Study area & receptors: <i>"Alford Town Council as a major Stakeholder on behalf of the communities of Alford it represents and the surrounding parishes who do not have a robust governmental infrastructure present in order to respond accordingly request that National Grid embark on the following:</i></p> <p><i>Alford Town Council have an information need for National Grid to have a study area wide enough to capture intervisibility between the OHL and:</i></p> <p><i>Alford Five-Sailed Windmill (Grade I) and its curtilage assets; Alford Manor House (Grade II*) and grounds; Alford Conservation Area and townscape viewpoints;"</i></p>	<p>As discussed above, any temporary effects on the setting of heritage assets have been scoped out of the assessment. If operational impacts are identified, these will be considered in the ES.</p>
Alford Council	<p>Town Scoping Opinion for Eastern Green Link 5</p> <p>Scoping request 4.1 – Alternatives Methodology</p> <p><i>"The Environmental Statement (ES) must provide a comprehensive and evidence-based multi-criteria analysis of alternatives, as required under Regulation 14(2)(d) of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, which obliges developers to describe the reasonable alternatives studied and indicate the environmental reasons for their selection. In particular, the ES should:</i></p> <p><i>Explicitly test undergrounding and subsea options in and around the Lincolnshire Wolds Area of</i></p> <p><i>Outstanding Natural Beauty (AONB), and the heritage-sensitive settlements of Alford, Bilsby, Rigsby, and Woodthorpe...</i></p> <p><i>Careful consideration of alternative technologies and alignments, particularly in sensitive landscapes and historic environments...</i></p> <p><i>Demonstration of “good design”, balancing functionality, cost, and environmental performance. Specific recognition in EN-5 that undergrounding should be given detailed consideration in or adjacent to nationally sensitive landscapes such as AONBs. Present a multi-criteria</i></p>	<p>Cultural Heritage and any setting impacts have been considered throughout the design process. Further detailed assessments in relation to impacts through changes within the setting of heritage assets will be undertaken following Historic England (2017) Good Practice Advice in Planning Note 3 (GPA 3): The Setting of Heritage Assets (Ref 7.1).</p>

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	<p><i>decision analysis (MCDA) framework, scoring each alternative against weighted factors such as:</i></p> <p><i>Heritage and setting impacts (using Historic England guidance).</i></p> <p><i>Provide transparent cost–benefit analysis: not only financial but also natural capital and social value accounting, to ensure that economic assessments include avoided heritage damage, tourism impacts, and community wellbeing. "</i></p>	
Alford Council	<p>Town Scoping Opinion for Eastern Green Link 5</p> <p>6 - Historic environment</p> <p>Scoping request 6.1 – Significance & setting:</p> <p><i>"Assess the Grade I Windmill, Alford Manor House and listed structures, considering pylons, DC to AC converter stations, and cumulative change"</i></p>	<p>As discussed above, any temporary effects on the setting of heritage assets have been scoped out of the assessment. If operational impacts are identified, these will be considered in the ES. Please note that as an underground and subsea cable scheme there will be no above ground infrastructure (other than link pillars) apart from the convertor station.</p>
Alford Council	<p>Town Scoping Opinion for Eastern Green Link 5</p> <p>6 - Historic environment</p> <p>Scoping request 6.2 – Heritage at Risk:</p> <p><i>"Assess impacts on mills, listed buildings, land of interest and heritage at risk across Lincolnshire."</i></p>	<p>As discussed above, any temporary effects on the setting of heritage assets have been scoped out of the assessment. If operational impacts are identified, these will be considered in the ES. Please note that as an underground scheme there will be no above ground infrastructure (other than link pillars) apart from the convertor station. Other impacts are assessed in Volume 2, Part 2, Chapter 7: Cultural Heritage and Volume 2, Part 2, Appendix 7.D: Cultural Heritage non-significant impacts.</p>

Consultee	Consideration	How this is addressed in the PEIR
Alford Council	<p>Town Scoping Opinion for Eastern Green Link 5 6 - Historic environment</p> <p>Scoping request 6.3 – Alford Manor House, Tothby Manor, Medieval Land, and Ancient Woodlands</p> <p><i>"Assess Manor House (Grade II*), medieval ridge-and-furrow land, deserted medieval villages (DMVs), and ancient woodlands as part of Alford's cultural identity and landscape character. "</i></p>	<p>Impacts on heritage assets within the draft Order Limits are assessed in Volume 2, Part 2, Chapter 7: Cultural Heritage and Volume 2, Part 2, Appendix 7.D: Cultural Heritage non-significant impacts.</p>
Alford Council	<p>Town Scoping Opinion for Eastern Green Link 5</p> <p>Scoping request 10.7 – Hedgerows & Historic Landscape Features</p> <p><i>"The ES must assess impacts on: Traditional hedgerows planted along early 20th century field edges. The parish boundary between Alford and Bilsby. Ridge-and-furrow remains still visible in the woodland. These are historic landscape features and should be evaluated under the Hedgerow Regulations 1997, Historic England guidance, and NPPF heritage policy. "</i></p>	<p>See Volume 2, Part 2, Chapter 7: Cultural Heritage, Table 7-5.</p> <p>The Contractor(s) would retain vegetation where practicable and in accordance with the 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.</p> <p>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.</p>

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Alford Council	<p>Town Scoping Opinion for Eastern Green Link 5 Scoping request 10.10 – Community & Cultural Value <i>"Given the memorial trees, WI Millennium oaks, and local orchard collection, the ES must assess impacts on community identity, cultural heritage, and sense of place, in line with EN-1 (NPS) duty to consider wellbeing and cultural assets. "</i></p>	<p>Impacts on historic hedgerows will be assessed in the ES where they fit the criteria as outlined in the 1997 Hedgerow Regulations (Ref 7.2).</p> <p>The Contractor(s) would retain vegetation where practicable and in accordance with the 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.</p> <p>Where relevant, intangible heritage associated with these woodlands and trees would be considered in the ES.</p>
Alford Council	<p>Town Scoping Opinion for Eastern Green Link 5 Scoping Request 13.0 - Deliverables <i>" Alford Town Council request at PEI/ES stage that National Grid supply in all accessible formats as previously mentioned the following: ...Heritage setting assessment (Windmill, Manor House, medieval land, woodlands)."</i></p>	<p>As discussed above, any temporary effects on the setting of heritage assets have been scoped out of the assessment. If operational impacts are identified, these will be considered in the ES. Impacts on heritage assets are assessed in Volume 2, Part 2, Chapter 7: Cultural Heritage and Volume 2, Part 2, Appendix 7.D: Cultural Heritage non-significant impacts.</p>
East Lindsey Council	<p>Lindsey Letter 30th September 2025 <i>"Cultural Heritage... Paragraph 7.6.2 confirms that there is no list of cultural heritage receptors which may be subject to significant effects and also confirms that this will be done following the development of a ZTV..."</i></p>	<p>As confirmed by the Planning Inspectorate, only impacts that will occur during construction and operation will be included in the PEIR and ES.</p>

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	<p><i>Paragraph 7.6.5 also states that there are a number of potential effects that have been scoped out and table 7.5 summarises those matters scoped out and those scoped in. ELDC also notes that there is further refinement work of the cable corridor route, locations of construction compounds and the location of the converter station to be carried out. Whilst these are uncertain, ELDC considers it is premature to rule out likely significant effects for temporary effects during construction arising through change within the setting of designated and non-designated heritage assets. ELDC therefore disagrees with the scoping out of this effect...</i></p> <p><i>ELDC agrees that direct effects on assets outside of the scoping boundary can be scoped out of further assessment as there is no pathway for such direct effects however this should be reviewed if the cable route and their construction corridor or the Converter Station are altered to move significantly closer to the Scoping Boundary. This should be considered as the EIA process develops...</i></p> <p><i>ELDC agrees that effects of repairs to above ground infrastructure or buried cables during the maintenance phase for designated and non-designated heritage assets; historic landscape character can be scoped out of further assessment. "</i></p>	
Historic England	<p>Letter 29th September 2025</p> <p><i>Within the Scoping Report "We note the proposed study areas presented within Chapter 7 'Cultural Heritage' are a good starting point for identifying potential impacts to heritage assets. This is demonstrated through the identified heritage assets that could be impacted by the proposed development. The further desk-based assessment and investigation proposed in Section 7.7 'Assessment Methodology' will build on this initial assessment...</i></p> <p><i>We suggest that Portable Antiquity Scheme data and consideration for Unexploded Ordnance within the onshore corridor are included within the desk-based assessment.</i></p>	<p>Data sources used to inform the cultural heritage assessment can be found in Volume 2, Part 2, Chapter 7: Cultural Heritage Table 7-4 of the PEIR.</p> <p>Historic Ordnance Survey (OS) mapping, UXO data and Portable Antiquity Scheme data will be used for the creation of baseline data for the ES.</p>

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Historic England	<p><i>We also recommend the use of Ordnance Survey 1-inch mapping because it tends to include wind drainage pumps and duck decoys that have often been lost by late 19th century 1:2500 edition maps. "</i></p> <p>Letter 29th September 2025</p> <p>Within Chapter 7 'Cultural Heritage' of the Scoping Report, "<i>Paragraph 7.4.25 lists that there are 93 Listed Buildings in Extended Study Area B, of which 5 are Grade I. However, the subsequent list only includes four Grade I buildings. It should be clarified what the 5th Grade I Listed Building is.</i>"</p>	<p>The revised Extended Study Area B now only includes one Grade I listed Building, Church of St Margaret (NHLE 1360009).</p>
Historic England	<p>Letter 29th September 2025</p> <p>Within Chapter 7 'Cultural Heritage' of the Scoping Report, "<i>We note the proposed converter station siting zone CS05 would impact the setting of Alford Conservation Area. We recommend that any Impact Assessment addresses this, and that any LVIA assesses key views into, and out of, the Conservation Area and impacts on highly graded buildings within it such as, but not limited to, Alford Manor House (NHLE 1063001) and the Church of St Wilfrid, Alford (NHLE 1063026). "</i></p>	<p>Study Area A (500 m from the draft Order limits) includes Alford Conservation Area. See Paragraph 7.5.3 of Volume 2, Part 2, Chapter 7: Cultural Heritage. Discussions over relevant viewpoints will be held with the Landscape and Visual Amenity team.</p>
Historic England	<p>Letter 29th September 2025</p> <p>Within Chapter 7 'Cultural Heritage' of the Scoping Report, "<i>Also within Alford Conservation Area is the highly significant Alford Windmill (NHLE 11146936), near its northernmost boundary and in closest proximity to the proposed CS05 zone. A thorough Impact Assessment in relation to this heritage asset would be essential. Any LVIA should include assessment of views from the vicinity of, and out of Alford Windmill, including from upper storey windows and the windmill stage. This assessment should then inform any potential location, design and layout of the development. "</i></p>	<p>Heritage and any setting impacts will be undertaken following Historic England (2017) Good Practice Advice in Planning Note 3 (GPA 3): The Setting of Heritage Assets (Ref 7.1). As discussed above, any temporary effects on the setting of heritage assets have been scoped out of the assessment. If operational impacts are identified, these will be considered in the ES. Discussions over relevant viewpoints will be held with the LVIA team if required.</p>

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Historic England	<p>Letter 29th September 2025</p> <p>Within Chapter 7 ‘Cultural Heritage’ of the Scoping Report, " <i>The proposed converter station siting zone CS05 also has the potential to impact on Grade II* listed Church of Holy Trinity, Bilsby (NHLE 1360007) to the south. Consideration should also be given to the siting of the converter station and potential screening options to minimise the impacts on the setting of this Listed Building.</i></p> <p><i>The proposed converter station siting zone CS06 has the potential to impact the Grade I listed Church of St Margaret, Huttoft (NHLE 1360009) and its setting. The associated impacts of the proposed development should be assessed and appropriate mitigation designed in to mitigate impact, as required. "</i></p>	<p>The potential impacts to these churches will be presented within the ES once the final design of the convertor station is fixed.</p>
Historic England	<p>Letter 29th September 2025</p> <p>Chapter 7 ‘Cultural Heritage’ of the Scoping Report, " <i>We understand from paragraphs 7.7.15-16 that a defined list of heritage assets that could be impacted by the proposed works has not yet been produced. As such, the Scoping Report has not set out an assessment of harm for different assets. Given that there is potential for both converter station siting zones to impact highly graded Listed Buildings, careful consideration needs to be undertaken of not only which siting zone would be less impactful, but also where within the selected zone to site the converter station, and what potential screening measures may be required... Additionally, it is positive to see the inclusion of other Graded Listed Buildings and Scheduled Ancient Monuments within the discussion of potential impacts within this chapter. "</i></p>	<p>The impacts associated with the construction of the Eastern Green Link (EGL) 5 English Onshore Scheme are set out within Volume 2, Part 2, Chapter 7: Cultural Heritage and Volume 2, Part 2, Appendix 7.D: Cultural Heritage non-significant impacts. The operational impacts of the Convertor Station will be presented within the ES once the design is fixed. Consideration to the impacts of each siting zone was given during the design process.</p>
Historic England	<p>Letter 29th September 2025</p> <p>Chapter 7 ‘Cultural Heritage’ of the Scoping Report, " <i>Additionally, as described in Section 7.8 ‘Assessment of Cumulative Effects’ in paragraphs 7.8.1-2 there are several projects identified within paragraphs 7.4.32-3 as either having overlapping boundaries with EGL 5 or in</i></p>	<p>Cumulative effects assessment (CEA) will be included within the ES chapter.</p>

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Historic England	<p>Letter 29th September 2025</p> <p>Chapter 7 'Cultural Heritage' of the Scoping Report</p> <p><i>"Historic England's Aerial Archaeology Mapping Explorer (AAME) is listed as a data resource in section 7.4.8. It is important to recognise the limitations of the AAME data. When using AAME data, consider the following:</i></p> <ul style="list-style-type: none"> ● <i>Project Age: Older mapping projects may have reduced spatial precision.</i> ● <i>New Data Sources: Check whether any new aerial or ground-based data has become available since the AAME project concluded.</i> ● <i>Lidar Usage: Confirm whether lidar was used to identify earthworks.</i> <p><i>Depending on the limitations of the data set it may be necessary for further aerial assessment to occur. "</i></p>	<p>The aerial photographic analysis will be undertaken as part of the ES and comments will be addressed as part of that assessment. The LiDAR data located earthworks as part of the analysis and details are included in Volume 2, Part 2, Appendix 7.C: Cultural Heritage gazetteers where relevant.</p>
Historic England	<p>Letter 29th September 2025</p> <p>Chapter 7 'Cultural Heritage' of the Scoping Report</p> <p><i>"We understand from the information supplies the project comprises of a high voltage direct current (HVDC) system linking Scotland and Lincolnshire in England. The marine scheme comprises the following elements:</i></p> <p><i>Approximately 415km of subsea HVDC cable from the MHWS mark at a proposed landfall at Anderby Creek, Lincolnshire, England to where it meets the marine boundary between English and Scottish waters.</i></p> <p><i>Various aspects of the construction, operations and maintenance, and decommissioning phases of the project are set out in the report. The</i></p>	<p>This information will be detailed in the ES. Further information can be found in Volume 1, Part 1, Chapter 4: Description of the Project.</p>

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Historic England	<p><i>Development Consent Order (DCO) application must be clear which activities associated with these phases are being applied for, and which will require separate applications."</i></p> <p>Letter 29th September 2025 Chapter 7 'Cultural Heritage' of the Scoping Report</p> <p><i>"We understand from the information supplies the project comprises of a high voltage direct current (HVDC) system linking Scotland and Lincolnshire in England. The marine scheme comprises the following elements:</i></p> <p><i>Approximately 415km of subsea HVDC cable from the MHWS mark at a proposed landfall at Anderby Creek, Lincolnshire, England to where it meets the marine boundary between English and Scottish waters.</i></p> <p><i>...It is advised that an archaeological desk-based assessment is commissioned from an appropriate and experienced marine archaeological contractor working to recognised professional standards, such as those defined by the Chartered Institute for Archaeologists. This is essential to qualify any material or features of historic environment interest revealed by geophysical or geotechnical surveys and create a comprehensive baseline for these licence areas... "</i></p>	<p>Volume 2, Part 2, Chapter 7: Cultural Heritage should be read in conjunction with and considered alongside the following technical aspect chapter found in Volume 1, Part 3, Chapter 25: Marine Archaeology (there will be interaction between the cultural heritage and marine archaeology assessments, in the location of the landfall and the intertidal area).</p>
Historic England	<p>Letter 29th September 2025 Chapter 7 'Cultural Heritage' of the Scoping Report</p> <p><i>" ...The EIA should therefore set out further guidance documents it will follow on the assets of survey data, such as the Historic England Deposit Modelling and Archaeology Guidance for Mapping Buried Deposits..."</i></p>	<p>Volume 2, Part 2, Chapter 7: Cultural Heritage Table 7-2 details the guidance documents that will be used. Any additional required guidance documents will be detailed within the ES chapter.</p>
Historic England	<p>Letter 29th September 2025 Chapter 7 'Cultural Heritage' of the Scoping Report</p> <p><i>"Furthermore, with regards to the collection of geoarchaeological data, it is important there is a method statement for retention, storage and stage 1</i></p>	<p>Geoarchaeological data will be considered within the ES chapter.</p>

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Historic England	<p>Letter 29th September 2025</p> <p>Chapter 7 'Cultural Heritage' of the Scoping Report</p> <p><i>"The proposed assessment methodology, as presented in Section 26.8, should also consider further guidance relevant to determining the value of maritime, aviation and seabed prehistory. This would be beneficial to the assessment of sensitivity."</i></p>	<p>The Cultural Heritage chapter should be read in conjunction with Volume 1, Part 3, Chapter 25: Marine Archaeology.</p>
Historic England	<p>Letter 29th September 2025</p> <p>Chapter 7 'Cultural Heritage' of the Scoping Report</p> <p><i>"...We note from paragraphs 28.8.28-30 'Mitigation' that potential impacts to known heritage assets will be mitigated through the application of Archaeological Exclusion Zones (AEZs), Temporary Archaeological Exclusion Zones (TAEZs), and subsequent micro-siting of infrastructure on the seabed, as necessary. Also, we understand that unavoidable impacts to potential receptors will be addressed through agreed mitigation measures, and that these measures will be set out in a project-specific Written Scheme of Investigation (WSI). Based on the information presented, these seem sensible and should be further developed as the desk-based assessment and site specific geophysical and geoarchaeological assessments are completed..."</i></p>	<p>See Volume 2, Part 2, Chapter 7: Cultural Heritage 7.6 Environmental Measures, Table 7-5</p>
Historic England	<p>Letter 29th September 2025</p> <p>Chapter 7 'Cultural Heritage' of the Scoping Report</p> <p><i>" Further, we request the need for any archaeological reports produced as a part of this development to be recorded via OASIS V (Online Access to the Index of archaeological Investigations)."</i></p>	<p>This will be included for relevant reports produced as part of the DCO.</p>
Lincolnshire County Council	<p>Letter 30th September 2025</p> <p>Chapter 7 'Cultural Heritage' of the Scoping Report</p>	<p>Volume 2, Part 2, Chapter 7: Cultural Heritage describes the methodology used, the datasets</p>

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	<p><i>"Archaeology</i> <i>LCC are generally supportive of the approach to archaeology outlined in the Scoping Report which acknowledges that the potential effects from permanent loss of archaeological remains are recognised and scoped in (Table 7-5: Likely significant Cultural Heritage effects) however LCC would look for a firm commitment to undertake sufficient evaluation to understand the archaeological potential of the English Onshore Scheme and for the results to inform an iterative approach to the design."</i></p>	<p>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 and operation (and maintenance) phases. Specifically, it relates to the English Onshore elements of the Project landward of Mean Low Water Springs (MLWS).</p> <p>The information provided in this PEIR is preliminary, with the final assessment of significant effects to be reported in the 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.</p> <p>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.</p>
<p>Lincolnshire County Council</p>	<p>Letter 30th September 2025 Chapter 7 'Cultural Heritage' of the Scoping Report <i>"Regarding the requirements for archaeological work which will need to be completed before the DCO submission, LCC would expect the desk-based</i></p>	<p>Desk-based research is ongoing and has been used to inform the PEIR. Initial information is provided in Volume 2, Part 2, Appendix 7.B: Cultural Heritage Baseline. This has included analysis of LiDAR data, with research using other</p>

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	<p><i>evaluation to be complete and the field evaluation to be well underway by the time the PEIR is produced."</i></p> <p><i>"The full standard suite of archaeological evaluation will be required. It's vital that a competent full desk-based assessment (DBA) be completed at the earliest opportunity as desk-based work provides the basis for initial understanding. This is informed by and built upon by a full air photo/LiDAR assessment and geophysical survey which in turn assists in the development of the trial trenching programme. Sufficient field evaluation forms an essential aspect of effective project management, particularly as unevaluated areas of unknown archaeological potential leave a high degree of risk to the development given the potential for archaeology to have significant impacts on work programmes and budgets. "</i></p>	<p>data sources ongoing. A full desk-based assessment (DBA) will be completed alongside the ES chapter. Geophysical survey is currently being planned and discussions will be held with relevant consultees over the requirements and scope of non-intrusive and intrusive evaluation required.</p>
<p>Lincolnshire County Council</p>	<p>Letter 30th September 2025</p> <p>Chapter 7 'Cultural Heritage' of the Scoping Report</p> <p><i>"The EIA will need to contain sufficient information on the archaeological potential and must include evidential information on the depth, extent and significance of the archaeological deposits which will be impacted by the development. The results will inform a fit for purpose mitigation strategy which will identify what measures are to be taken to minimise the impact of the proposal on archaeological remains"</i></p> <p><i>"Section 5.3 of the Scoping Report highlights the Rochdale Envelope. Where the developer proposes the Rochdale Envelope in dealing with their application, it is essential that an understanding of the archaeological resource is achieved to allow for informed and appropriate mitigation. This can only be achieved through adequate trenching evaluation of the full impact zone and the timely provision of the results to inform the baseline evidence and subsequent informed fit for purpose mitigation strategy. Ideally this should be in advance of the determination and certainly the results are needed in advance of the work programme commencing in any of the areas not currently adequately evaluated.</i></p>	<p>Evaluation excavation is proposed as part of the ES and the required information will be available to inform the impact assessment. This will 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. See Section 7.11 of Volume 2, Part 2, Chapter 7: Cultural Heritage.</p>

Consultee	Consideration	How this is addressed in the PEIR
	<p><i>This is in accordance with NSIPs Advice Note Nine which states that 'Implementation of the Rochdale Envelope assessment approach should only be used where it is necessary and should not be treated as a blanket opportunity to allow for insufficient detail in the assessment. Applicants should make every effort to finalise details applicable to the Proposed Development prior to submission of their DCO application. Indeed, as explained earlier in this Advice Note, it will be in all parties' interests for the Applicant to provide as much information as possible to inform the Pre-application consultation process.'</i> (5.2) "</p>	
Lincolnshire County Council	<p>Letter 30th September 2025 Chapter 7 'Cultural Heritage' of the Scoping Report</p> <p><i>"Section 7.3.5 of the Scoping Report states that 'Engagement with key stakeholders will be ongoing up to the submission of the Development Consent Order (DCO) to ensure agreement of the approach to the assessment.'</i> LCCs archaeologist has yet to be consulted directly, LCC strongly encourage engagement at the earliest opportunity. "</p> <p><i>"Section 7.7.3 of the Scoping Report states that 'Evaluation may include non-intrusive geophysical survey and intrusive survey through trial trenching, and the programme would be agreed through consultation.'</i> LCC strongly recommends that evaluation will include the full suite of standard evaluation techniques including geophysical survey and trenching be undertaken and that the results be used to inform the corridor selection process. "</p>	<p>A first consultation meeting with the relevant consultees will be set-up as soon as the PEIR is completed to provide an update on the status of the project and upcoming work.</p>
Lincolnshire County Council	<p>Letter 30th September 2025 Chapter 7 'Cultural Heritage' of the Scoping Report</p> <p><i>"LCC notes with interest that this section goes on to state that 'Intrusive survey would be targeted on areas where a review of the desk-based data and geophysical survey have not identified potential archaeological remains, i.e. 'blank' areas. This will be to test if such areas are archaeologically sterile. The results of this may inform the design of the</i></p>	<p>Following completion of geophysical survey, a trenching strategy will be designed in consultation with the Local Planning Authority and, where relevant, Historic England. While the focus will be on the assessment of seemingly blank areas, testing of geophysical anomalies will also be</p>

Consultee	Consideration	How this is addressed in the PEIR
	<p><i>English Onshore Scheme and potentially negate the need for further archaeological monitoring or open area excavation though avoidance of these areas.'</i></p> <p><i>This is an interesting approach for informing the management of archaeological risk however LCC also recommend that the trenching programme include targeted trenching of the desk-based assessment and geophysical survey results. Geophysical survey should be undertaken across the full extent of the onshore order limits."</i></p> <p><i>"LCC advise that where geophysical survey is not undertaken a higher percentage of evaluation trenching will be necessary to obtain sufficient baseline evidence to determine archaeological potential and inform the mitigation process to deal with the development's impact within the full impact zone. It is critical that the applicant have the baseline evidence to be able to assess and understand the site-specific impact of the development on the archaeological resource.</i></p> <p><i>Sufficient information on the archaeological potential must include evidential information on the depth, extent and significance of the archaeological deposits which will be impacted by the development. The results will inform a fit for purpose mitigation strategy which will identify what measures are to be taken to minimise or adequately record the impact of the proposal on archaeological remains which must be submitted with the EIA.</i></p> <p><i>This is in accordance with The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 which states "The EIA must identify, describe and assess in an appropriate manner...the direct and indirect significant impacts of the proposed development on...material assets, cultural heritage and the landscape." (Regulation 5 (2d))</i></p>	<p>undertaken, especially where the cause of the response is uncertain.</p>
<p>Lincolnshire County Council</p>	<p>Letter 30th September 2025 Chapter 7 'Cultural Heritage' of the Scoping Report <i>"Built Heritage...</i></p>	<p>The ES will include a robust assessment of impacts on the setting of heritage assets. Preliminary information is contained within</p>

Consultee	Consideration	How this is addressed in the PEIR
	<p><i>The Scoping Report identifies the need for an assessment of cultural heritage receptors within 2 km of the onshore elements, including the converter station, landfall and cable routes. LCC supports this approach but advises that the study area should remain flexible to ensure that any assets whose significance is derived from a wider setting are properly considered, including potential cumulative effects with other NSIPs and large-scale energy infrastructure. The methodology should be aligned with Historic England guidance with clear distinction between archaeological and above-ground heritage assets and proportionate use of field verification where desktop data is insufficient. LCC expects the Environmental Statement (ES) to set out a robust assessment of potential direct and indirect effects on the historic environment, including setting, character and cumulative change. Where harm to the significance of heritage assets cannot be avoided, this should be clearly articulated and accompanied by appropriate design or mitigation measures "</i></p>	<p>Volume 2, Part 2, Chapter 7: Cultural Heritage and its associated appendices. See Table 7-7 of the chapter.</p>
<p>Lincolnshire County Council</p>	<p>Letter 30th September 2025 Chapter 7 'Cultural Heritage' of the Scoping Report</p> <p><i>"LCC expects the Environmental Statement (ES) to set out a robust assessment of potential direct and indirect effects on the historic environment, including setting, character and cumulative change. Where harm to the significance of heritage assets cannot be avoided, this should be clearly articulated and accompanied by appropriate design or mitigation measures "</i></p>	<p>This will be considered within the ES chapter.</p>
<p>Lincolnshire County Council.</p>	<p>Letter 30th September 2025 Chapter 7 'Cultural Heritage' of the Scoping Report</p> <p><i>"We would also expect any landscape and planting scheme is coordinated with other relevant disciplines" such as 'heritage'."</i></p>	<p>The assessment will be undertaken in consultation with the Landscape and Ecological Management Plan and other technical disciplines including Landscape and Visual Amenity, and Biodiversity.</p>

Bibliography

Ref 7.1 Historic England (2015). Good Practice Advice in Planning Note 2 (GPA 2): Managing Significance in decision-taking in the Historic Environment. [online]. Available at: <https://historicengland.org.uk/images-books/publications/gpa2-managing-significance-in-decision-taking/gpa2/> [Accessed 24 April 2026].

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