



# SUNNICA ENERGY FARM

EN010106

8.16 Statement of Common Ground with Historic England

Planning Act 2008

Infrastructure Planning (Examination Procedure) Rules 2010



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**The Infrastructure Planning  
(Examination Procedure) Rules 2010**

**Sunnica Energy Farm**

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# 1 Introduction

## 1.1 Purpose of this document

- 1.1.1 This Statement of Common Ground (SoCG) has been prepared in respect of the application for the proposed Sunnica Energy Farm Development Consent Order ("the Application") made by Sunnica Limited ("Sunnica") to the Secretary of State for the Department for Business, Energy and Industrial Strategy ("Secretary of State") for a Development Consent Order ("the Order") under section 37 of the Planning Act 2008 ("PA 2008").
- 1.1.2 The order, if granted, would authorise Sunnica to construct, operate (including maintain) and decommission a ground mounted solar photovoltaic ('PV') farm across Sunnica East Site A, Sunnica East Site B and Sunnica West Site A. The Scheme includes the following key components:
- a. Solar PV modules;
  - b. PV module mounting structures;
  - c. Inverters;
  - d. Transformers;
  - e. Switchgear;
  - f. Onsite cabling (including high and low voltage cabling) and cabling between the Sites and to the Burwell National Grid Substation;
  - g. One or more BESS (expected to be formed of lithium ion batteries storing electrical energy) on Sunnica East Site A, Sunnica East Site B, and Sunnica West Site A;
  - h. An electrical compound comprising a substation and control building (Sunnica East Site A, Sunnica East Site B, and Sunnica West Site A only);
  - i. Office/warehouse (Sunnica East Site A and Sunnica East Site B only)
  - j. Fencing and security measures;
  - k. Drainage;
  - l. Internal access roads and car parking;
  - m. Landscaping including habitat creation areas; and
  - n. Construction laydown areas.
- 1.1.3 This SoCG does not seek to replicate information which is available elsewhere within the Application documents. All documents are available in the deposit locations and/or the Planning Inspectorate website.
- 1.1.4 This SoCG has been produced to confirm to the Examining Authority (ExA) where agreement has been reached between the parties to it, and where agreement has

not (yet) been reached. SoCGs are an established means in the planning process of allowing all parties to identify and so focus on specific issues that may need to be addressed during the examination.

## 1.2 Parties to this Statement of Common Ground

1.2.1 This SoCG has been prepared by (1) Sunnica as the Applicant and (2) Historic England.

1.2.2 Sunnica is a Special Purpose Vehicle (SPV) incorporated in 2013 to construct, operate, and decommission the Sunnica Energy Farm.

1.2.3 The Historic Buildings and Monuments Commission for England (HBMCE) is better known as Historic England and is the Government's adviser on all aspects of the historic environment in England - including historic buildings and areas, archaeology and historic landscape. Historic England has a duty to promote conservation, public understanding and enjoyment of the historic environment. Historic England is an executive Non-Departmental public body and answer to Parliament through the Secretary of State for Digital, Culture, Media and Sport.

1.2.4 In relation to section 88 of the Planning Act 2008 (as amended) and the infrastructure Planning (Examination Procedure) Rules 2010 (as amended) Historic England is a statutory consultee with responsibilities within the terrestrial landscape.

1.2.5 Collectively Sunnica and Historic England are referred to as 'the parties'.

## 1.3 Terminology

1.3.1 In the table in the Issues chapter of this SoCG:

- a. "Agreed" indicates where the issue has been resolved.
- b. "Not Agreed" indicates a final position, and
- c. "Under discussion" indicates where these points will be the subject of on-going discussion wherever possible to resolve, or refine, the extent of disagreement between the parties.

1.3.2 It can be taken that any matters not specifically referred to in the Issues chapter of this SoCG are not of material interest or relevance to Historic England's representation and therefore have not been considered in this document. It is recognised however that engagement between both parties will need to continue due to their joint interest in matters arising from the Scheme.

## 2 Record of Engagement

2.1.1 A summary of the meetings and correspondence that has taken place between Sunnica and Historic England in relation to the Application is outlined in **Table 1**. There has been email correspondence between the parties to discuss the sharing of information, arrangement of meetings and for them to comment on draft documentation, but this table reflects the key meetings and emails of note that have taken place between the parties.

**Table 1: Record of Engagement**

Date	Form of correspondence	Key topics discussed and key outcomes (the topics should align with the Issues tables)
20/02/2019	Initial Briefing Meeting	Key topics: <ul style="list-style-type: none"> <li>• Scheme overview</li> <li>• Scheduled Monuments</li> <li>• Photographs and EIA Scoping Report</li> <li>• Programme of meetings</li> </ul>
13/03/2019	Email from Sunnica	Issue of EIA Scoping Report
26/03/2019	Email from Historic England	EIA scoping response as sent to PINS
19/06/2019	Landscape and Heritage Workshop	Key topics: <ul style="list-style-type: none"> <li>• Updates on the Scheme development</li> <li>• Viewpoints, assessment and photography</li> <li>• Impact assessment</li> <li>• Cumulative effects</li> <li>• Glint and Glare</li> <li>• Chippenham Hall</li> </ul>
28/06/2019	Email from Historic England	Advice relating to Chippenham Hall Park and Garden. Advice on engagement going forward with Cambridgeshire Gardens Trust.
09/07/2019	Email from Sunnica	Consultation on approach to geophysical surveys at the four bowl barrows north of the A11/A14 junction.
18/07/2019	Archaeology Workshop	Key topics included: <ul style="list-style-type: none"> <li>• Design update</li> <li>• Viewpoints on PRowS</li> <li>• Permissive paths</li> <li>• Green infrastructure</li> </ul>
06/12/2019	Email from Sunnica	Consultation on built heritage for the Preliminary Environmental Information Report.
07/05/2020	Heritage Meeting	Key topics: <ul style="list-style-type: none"> <li>• Update on the Scheme design</li> <li>• Scheduled Monuments, particularly those around Burwell</li> <li>• Update on built heritage context for the Scheme (baseline)</li> <li>• Geophysical survey progress</li> <li>• Proposed trial trenching strategy</li> <li>• Structure of the Preliminary Environmental Information Report</li> </ul>
17/12/2020	HE's response to S.42 consultation	Advice provided on the assessment of setting and built heritage, including Chippenham Registered Park and Garden, listed buildings and conservation areas, which was supportive of the approach. Photomontages were requested. Impacts on the scheduled barrows and the



Date	Form of correspondence	Key topics discussed and key outcomes (the topics should align with the Issues tables)
		<p>Roman villa were considered and longer term management of the barrows was also discussed.</p> <p>Comments were provided on impacts to buried archaeological remains, further evaluation and mitigation.</p>
26/02/2021	Heritage Meeting	<p>Key topics:</p> <ul style="list-style-type: none"> <li>• Update on Scheme design</li> <li>• Visualisations</li> <li>• Fieldwork</li> <li>• Feedback from statutory consultation</li> <li>• Programme</li> </ul>
29/03/2021	Email from Historic England	Query regarding coverage of views to/from Scheduled Monuments.
01/04/2021	Email from Sunnica	Provision of technical note outlining the management of heritage areas.
29/04/2021	Heritage and Ecology Meeting	<p>Key topics:</p> <ul style="list-style-type: none"> <li>• Heritage offset areas</li> <li>• Stone curlew requirements</li> <li>• Landscape proposals</li> <li>• Grassland planting</li> </ul>
10/03/2022	Meeting	SoCG initial meeting between Sunnica and Historic England
07/10/2022	Meeting	<p>SoCG meeting between Sunnica and Historic England</p> <p>Sunnica Ltd shared the updated SoCG with Historic England after the meeting.</p>
20/10/2022	Email from Sunnica Ltd to Historic England	Email sharing the Applicant's responses to Historic England's Relevant Representations.
14/12/2022	Meeting between Sunnica Ltd and Historic England	SoCG discussion prior to Deadline 4.
23/01/2023	Meeting between Sunnica Ltd and Historic England	SoCG discussion prior to Deadline 6.
27/02/2023	Meeting between Sunnica Ltd and Historic England	SoCG discussion prior to Deadline 7.

2.1.2 The issues and matters highlighted in **Table 2** summarise the key issues that have been in discussion between the two parties. The format of **Table 2** differs slightly from the format of other SoCGs with different stakeholders for the Scheme in response to a request from Historic England.

## 3 Issues

### 3.1 Issues Raised

3.1.1 **Table 2** below details the matters agreed, under discussion and not agreed with Historic England.

**Table 2: Matters Agreed, Under Discussion and Not Agreed**

Topic	Sub-topic	Details of Matters	Details of Discussion	Status (Agreed / Not Agreed / Under Discussion)
Cultural Heritage	Consultation	The record of consultation presented in table 1 above is an accurate record of the key meetings and consultation undertaken between (1) Sunnica and (2) Historic England in relation to the issues addressed in this SoCG as at the date of this SoCG.	Consultation with Historic England is complete and table 1 has been updated accordingly.	Agreed
	Legislation and policy	The Environmental Statement (ES) has taken reasonable steps to identify and consider applicable legislation and national policy in the assessments undertaken as part of the Environmental Impact Assessment (EIA) of the Scheme: <ul style="list-style-type: none"> <li>• Cultural heritage <b>[APP-39]</b>;</li> <li>• Effect Interactions <b>[APP-050]</b> – in relation to in-combination and cumulative effects.</li> </ul>	Agreed in meeting on 14 December 2022.	Agreed
	Study area definition and extents	In relation to study areas, the Applicant has taken reasonable steps to consider and reflect current best practice and standards within the following assessments: <ul style="list-style-type: none"> <li>• Cultural heritage <b>[APP-39]</b> – in relation to designated sites and features, historic landscapes, archaeology (known and potential), and built heritage.</li> </ul>	Agreed in meeting on 14 December 2022.	Agreed



Topic	Sub-topic	Details of Matters	Details of Discussion	Status (Agreed / Not Agreed / Under Discussion)
		<ul style="list-style-type: none"> <li>Effect Interactions <b>[APP-050]</b> – in relation to in-combination and cumulative effects.</li> </ul> <p>The geographical extents of the adopted study areas are suitable to identify the likely direct and indirect effects of the Scheme on sensitive features and receptors.</p>		
		<p>The geographical extents of the adopted study areas are suitable to identify the likely direct and indirect effects of the Scheme on sensitive features and receptors.</p>	Agreed in meeting on 14 December 2022.	Agreed
	Application of expert/ professional judgements	<p>The identification of likely significant effects on sensitive features and receptors has been informed by professional judgement and the views of relevant technical specialists, where necessary.</p> <ul style="list-style-type: none"> <li>The parties consider the application of professional judgement within the following assessments to be suitable for the purposes of this examination. Cultural heritage <b>[APP-39]</b> – in relation to designated sites and features, historic landscapes, archaeology (known and potential), and built heritage.</li> <li>Effect Interactions <b>[APP-050]</b> – in relation to in-combination and cumulative effects.</li> </ul>	Agreed in meeting on 14 December 2022.	Agreed
	Presentation of results	<p>The following application documents present the approaches to, and outcomes of, assessments undertaken to identify the likely significant effects of the construction, operation and decommissioning phases of the Scheme:</p> <ul style="list-style-type: none"> <li>Cultural heritage <b>[APP-39]</b> – in relation to designated sites and features, historic landscapes, archaeology (known and potential), and built heritage.</li> </ul>	Agreed in meeting on 14 December 2022.	Agreed

Topic	Sub-topic	Details of Matters	Details of Discussion	Status (Agreed / Not Agreed / Under Discussion)
		<ul style="list-style-type: none"> <li>Effect Interactions <b>[APP-050]</b> – in relation to in-combination and cumulative effects.</li> </ul> <p>The format and methods used to present the assessments are adequate.</p>		
	Data collection methods, baseline data and the identification and sensitivity of relevant features and receptors	<p>The baseline conditions have been collated using desk-based and field-based techniques, and through consultation with stakeholders.</p> <p>The scope, coverage and timing of surveys undertaken to establish the baseline conditions and sensitive features and receptors are in line with best practice and sufficient to inform the assessment of direct and indirect effects reported in Chapter 7: Cultural heritage assessment <b>[APP-39]</b>.</p>	Agreed in meeting on 14 December 2022.	Agreed
	Assessment findings: construction and decommissioning	<p>The cultural heritage assessment has concluded that construction and decommissioning of the Scheme would result in significant adverse effects on the assets listed in Table 18-1 and Table 18-3 of Chapter 18, Summary of Significant Environmental Effects <b>[APP-050]</b>.</p> <p>All other assets identified and assessed would experience either:</p> <ul style="list-style-type: none"> <li>Slight adverse effects (not significant).</li> <li>Neutral effects (not significant).</li> <li>Slight beneficial effects (not significant).</li> </ul>	Agreed in meeting on 14 December 2022.	Agreed
	Assessment findings: operation	<p>The cultural heritage assessment has concluded that operation of the Scheme would result in significant adverse effects on the assets listed in Table 18-2 of Chapter 18, Summary of Significant Environmental Effects <b>[APP-050]</b>.</p>	Agreed in meeting on 14 December 2022.	Agreed

Topic	Sub-topic	Details of Matters	Details of Discussion	Status (Agreed / Not Agreed / Under Discussion)
		<p>All other assets identified and assessed would either experience:</p> <ul style="list-style-type: none"> <li>• Slight adverse effects (not significant).</li> <li>• Neutral effects (not significant).</li> <li>• Slight beneficial effects (not significant).</li> </ul>		
	Mitigation	<p>In relation to mitigation:</p> <ul style="list-style-type: none"> <li>• The embedded mitigation measures within Chapter 7, Cultural heritage <b>[APP-039]</b>, and</li> <li>• The essential mitigation measures set out in the Framework CEMP <b>[REP8-011]</b>, Framework OEMP <b>[REP8-015]</b>, Framework DEMP <b>[REP8-013]</b>, and the Detailed Archaeological Mitigation Strategy (DAMS) <b>[EN010106/APP/8.79]</b>.</li> </ul> <p>are adequate to avoid, prevent, reduce, manage, control and (where necessary) monitor the adverse effects of the Scheme during its construction, operation and decommissioning.</p>	Agreed following meeting on 27 February 2023.	Agreed
		<p>At Deadline 10, the Outline HEMP (within the OLEMP) <b>[EN010106/APP/6.2]</b> and DAMS <b>[EN010106/APP/8.79]</b> were updated to address Historic England's comments outlined in an email received on 8 March 2023.</p> <p>In an email received on 22 March 2023, Historic England raised concerns that the Outline HEMP lacks a coherent approach to the management of the scheduled monument in W09.</p> <p>The Outline HEMP was further updated to provide that more information on this point will be provided in the Method</p>	Discussions will be ongoing post-Examination.	Under Discussion

Topic	Sub-topic	Details of Matters	Details of Discussion	Status (Agreed / Not Agreed / Under Discussion)
		<p>Statements to be provided post-consent, as set out in the updated OHEMP submitted at Deadline 10.</p> <p>The Applicant is discussing this wording with Historic England to seek to agree it prior to the end of Examination.</p>		
	<p>Effect Interactions: Baseline data</p>	<p>An assessment of the likely significant cumulative effects of the Scheme on the historic environment in combination with other existing and/or approved developments and projects has been undertaken <b>[APP-049]</b>. The assessment has considered:</p> <ul style="list-style-type: none"> <li>• Existing completed projects.</li> <li>• Approved but uncompleted projects.</li> <li>• Ongoing activities.</li> <li>• Plans or projects for which an application has been made and which are under consideration by consenting authorities; and plans and projects which are reasonably foreseeable.</li> </ul> <p>Cumulative developments and projects were initially identified through a long list, with qualifying developments subsequently shortlisted for consideration in the assessment.</p> <p>It is considered by the parties that the approach to identifying other development projects, their shortlisting and subsequent inclusion in the cumulative effects assessment is robust (as related to its topics and areas of interest to Historic England).</p>	<p>Agreed in meeting on 14 December 2022.</p>	<p>Agreed</p>
	<p>Effect Interactions: Assessment findings: Construction, operation and</p>	<p>The assessment <b>[APP-049]</b> has concluded that no significant adverse effects would arise on cultural heritage from the effects of the Scheme interacting cumulatively with other planned projects and developments.</p>	<p>Agreed in meeting on 14 December 2022.</p>	<p>Agreed</p>

Topic	Sub-topic	Details of Matters	Details of Discussion	Status (Agreed / Not Agreed / Under Discussion)
	decommissioning effects	It is considered by the parties that the outcomes of the cumulative effects assessment in relation to development interactions are accurate.		
	Interaction of disciplines	The assessment presented in Chapter 7, Cultural Heritage <b>[APP-039]</b> takes into consideration the known aspects of the Scheme which have the potential to impact on the appreciation of the heritage assets, including noise, light and visual changes.	Agreed in meeting on 14 December 2022.	Agreed
	Mitigation: Barrows	<p>Removal of the historic barrows from agriculture as a result of the Scheme represents a benefit by virtue of the risk of damage from cultivation activity being removed.</p> <p>However, their management during the lifetime of the Scheme is to be set out in HEMP Method Statements for each of the construction phase, operation phase, and prior to the undertaking of decommissioning works, which will build on the principles set out in the Outline HEMP. Historic England will be consulted on the development of these Method Statements.</p>	<p>The Scheme does not propose to extend the existing agricultural class consents around the barrows. They will therefore not apply to the relevant land following decommissioning of the Scheme.</p> <p>The DCO at Deadline 4 was amended to provide for Historic England's consultee role on these documents. At Deadline 5, an updated Outline LEMP <b>[REP5-014]</b> was submitted which includes the Outline HEMP and information about landscape management around the Barrows.</p>	Agreed

## 4 Signatures

This Statement of Common Ground is agreed:

**On behalf of Historic England:**

Name: Dr Will Fletcher

Signature: 

Date: 08 March 2023

**On behalf of the Applicant:**

Name: Luke Murray

Signature: 

Date: 8 March 2023