



Longfield Solar Farm

Statement of Common Ground – Historic England

Document Reference : EN010118/EX/8.4

Revision 1.0

August 2022

Longfield Solar Energy Farm Ltd

Rule 8(1)(e)
Planning Act 2008
Infrastructure Planning (Examination Procedure) Rules 2010

Table of Contents

1.	Introduction.....	1
1.1	Purpose of this document	1
1.2	Parties to this Statement of Common Ground	1
1.3	Terminology	1
2.	Record of Engagement	2
2.1	Summary of consultation.....	2
3.	Issues	4
3.1	Cultural Heritage	4
4.	Signatories	15
4.1	Overview	15

1. Introduction

1.1 Purpose of this document

- 1.1.1 This Statement of Common Ground (SoCG) has been prepared as part of the proposed Longfield Solar Farm Development Consent Order (the Application) made by Longfield Solar Energy Farm Ltd (The Applicant) to the Secretary of State for Business, Energy and Industrial Strategy (the Secretary of State) pursuant to the Planning Act 2008 (PA 2008).
- 1.1.2 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.
- 1.1.3 This SoCG has been produced to confirm to the Examining Authority (ExA) where agreement has been reached between the parties, and where agreement has not (yet) been reached. SoCGs are an established means in the planning process of allowing all parties to identify and 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) Longfield Solar Energy Farm Ltd as the Applicant and (2) Historic England.
- 1.2.2 Collectively, Longfield Solar Energy Farm Ltd and Historic England are referred to as 'the parties'.

1.3 Terminology

- 1.1.1 In the table in the Issues chapter of this SoCG:
 - “Agreed” indicates where the issue has been resolved.
 - “Not Agreed” indicates a final position, and
 - “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.

2. Record of Engagement

2.1 Summary of consultation

2.1.1 The parties have been engaged in consultation since the beginning of the proposed development. A summary of the meetings and correspondence that has taken place between Longfield Solar Energy Farm Ltd and Historic England in relation to the Application is outlined in **Table 2-1**.

Table 2.1 - Record of Engagement

Date	Form of correspondence	Key topics discussed and key outcomes (the topics should align with the Issues tables)
06/11/2020	EIA Scoping request	Key topics included: proposed study area; proposed assessment methodology; initial identification of effects.
09/11/2020	EIA Scoping response	Initial response from consultation. Included agreement of assessment methodology with specific note of: involvement of Chelmsford City Council and Place Services and County Archaeologist in development of scheme; effect of alteration of drainage patterns on below ground archaeological remains; use of qualitative and expert judgement in addition to EIA matrices; assessment of the potential impact of the scheme's associated activities on perceptions, understanding and appreciation of the heritage assets in the area; demonstration of exploration of alternative sites for the proposed solar farm.
01/06/2021 to 13/07/2022	Statutory consultation - Response to PEIR	Consultation response to PEI Report. Points noted included: recommendation of use of GPA2 and GPA3; recommendation to include assessment of four grade II RPGs; recommendation of a closer link between cultural heritage and LVIA; recommendation to group assets of the highest designation;

recommendation of use of photomontages and rendered images;

request for viewpoints from scheduled monuments within the 3km study area;

need for evaluation and deposit modelling to establish the potential for buried archaeological remains;

request for more detailed information on trial trenching evaluation;

request for a re-assessment of the palaeoenvironmental potential of the proposed development area;

request that the scope of works (Written Scheme of Investigation - WSI) for the trial-trenched evaluation be agreed with ECC Place Services;

request for the opportunity to comment on the extent of the trial-trenched evaluation;

request to review and comment on the overarching WSI detailing proposed mitigation works;

request to be consulted upon the assessment work, and the results, prior to the submission of the full application;

recommendation that issues such as pollution or changes to water quality discuss the impacts on the historic environment;

recommendation that the heat emitted from the buried cables is considered in terms of the impacts that this may have on any archaeological remains present.

03/06/2022	Relevant Representation	Basis for baseline data to support planning application prior to determination; impact to designated assets; mitigation design to minimise harm; non-designated assets.
-------------------	-------------------------	--

2.1.2 It is agreed that this is an accurate record of the key meetings and consultation undertaken between (1) Longfield Solar Energy Farm Ltd and (2) Historic England in relation to the issues addressed in this SoCG.

3. Issues

3.1 Cultural Heritage

Ref	Sub-topic	Stakeholder Comment	Applicant's Response	Status
1	Methodology	Historic England requested that the impact assessment is aligned with the advice in the National Planning Policy Framework (NPPF) and that all elements which contribute to the significance of relevant assets be assessed. [Scoping]	The impact assessment in both the PEIR and the ES chapter is aligned with the advice in the NPPF. All elements which contribute to the significance of assets including the contribution made by setting have been assessed in the Cultural Heritage ES Chapter.	Agreed
2	Methodology	Historic England requested that section drawings and techniques such as photomontages form part of the assessment of changes to setting arising from the Scheme. [Scoping]	Drawings supplied by the design team and photomontages supplied by the LVIA team were used to assess changes to setting in both the PEIR and the Cultural Heritage ES chapter.	Agreed
3	Consultation	Historic England recommended that conservation staff at Chelmsford City Council and Place Services, who provide conservation advice to Braintree District Council, are consulted together with the archaeological staff at the County Council. [Scoping]	Essex County Council's Place Services have been consulted throughout the preparation of the DCO application, including pre-submission archaeological surveys and the design of the archaeological mitigation strategy. Host local authorities were consulted in September 2021. Subsequently consultation was undertaken at the PEIR stage. The Principal Conservation Officer with Chelmsford City Council and Lead Principal Planner at Braintree District Council were consulted and both attended a Teams meeting on 25/06/2021.	Agreed
4	Drainage	The assessment should consider, where appropriate, the likelihood of alterations to drainage patterns that might lead to in situ	Changes to groundwater levels and drainage which may alter the preservation of archaeological remains or impact buildings and monuments have	Agreed

Ref	Sub-topic	Stakeholder Comment	Applicant's Response	Status
		decomposition or destruction of below ground archaeological remains and deposits, and where it can also lead to subsidence of buildings and monuments. [Scoping]	been considered as part of the ES as per Historic England advice. This has been informed by the assessment of changes to drainage set out in the relevant chapter and applied to cultural heritage.	
5	Setting of heritage assets	Historic England stated that changes to setting should not be restricted to visual impact but should also include the potential impact which associated activities (such as construction, servicing and maintenance, and associated traffic) might have upon perceptions, understanding and appreciation of the heritage assets in the area. [Scoping]	All potential impacts on the historic environment as a result of the proposed scheme have been assessed in the ES chapter including impacts stemming from construction, operation and dismantling.	Agreed
6	Setting of heritage assets	The assessment should be carried out in accordance with guidance set out in the Planning Practice Guidance and the Historic England document Historic Environment Good Practice Advice in Planning Note 3 The Setting of Heritage Assets. [Scoping]	GPA3 was used in the setting assessment in the Cultural Heritage ES chapter.	Agreed
7	Application of expert/professional judgements	Historic England considered the analysis of setting (and the impact upon it) as a matter of qualitative and expert judgement which cannot be achieved solely by use of systematic matrices or scoring systems. Historic England therefore recommended that these should be seen primarily as material supporting a clearly expressed and non-technical narrative argument within the Historic Environment chapter. The EIA should use the ideas of benefit, harm and loss (as described in the NPPF) to set out 'what matters and why' in terms of the heritage assets' significance and	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. Longfield Solar Energy Farm Ltd considers the application of professional judgement by its specialists to be appropriate and robust in their assessment of the historic environment and effect interactions within the Cultural Heritage Chapter of the ES.	Agreed

Ref	Sub-topic	Stakeholder Comment	Applicant's Response	Status
		setting, together with the effects of the development upon them. [Scoping]		
8	Impacts of associated activities	Historic England's position was that potential impact which associated activities (such as construction, servicing and maintenance, and associated traffic) might have upon perceptions, understanding and appreciation of the heritage assets in the area should also be considered. [Scoping]	Potential impacts stemming from all activities associated with the proposed scheme including construction, operation and decommissioning have been assessed. This includes changes to the perception, appreciation and understanding of each asset.	Agreed
9	Scope of EIA	We would also expect the EIA to consider the potential impacts on the non-designated features of historic, architectural, archaeological or artistic interest, since these can also be of national importance and make an important contribution to the character and local distinctiveness of an area and its sense of place. [Scoping]	Potential impacts on all cultural heritage assets identified, whether designated or non-designated, have been assessed. Although no non-designated assets have been found to be of national importance, each asset's significance has been considered within its local, regional, national, and international context.	Agreed
10	Alternatives	The applicant should demonstrate that as part of the EIA process they have explored alternative sites for the proposed solar farm, with a view to minimising the level of harm the scheme would cause to designated and undesignated assets in the historic environment. [Scoping]	Longfield Solar Energy Farm Ltd has undertaken thorough and comprehensive studies, appraisals and optioneering studies during the design-development of the Scheme, in pursuit of establishing its preferred design solution, as described in Chapter 2, The Scheme and Chapter 3, Alternatives and Design Evolution of the Environmental Statement. In considering, evaluating and balancing constraints and opportunities, Longfield Solar Energy Farm Ltd considers that the preliminary design of the Scheme represents the optimum solution to meet the Scheme objectives.	Agreed

Ref	Sub-topic	Stakeholder Comment	Applicant's Response	Status
11	Approach to assessment	Historic England was supportive of the detailed approach to the assessment of setting outlined in Chapter 7: Cultural Heritage of the PEIR and were satisfied that all the relevant heritage assets in relation to the Site had been identified. They agreed with the assessment of their significance. [Response to PEIR]	This is acknowledged and agreed.	Agreed
12	Approach to assessment	Historic England recommended that the guidance set out in GPA2; Managing Significance in Decision-taking in the historic Environment and GPA3; The Setting of Heritage Assets is used and referenced in the full ES. [Response to PEIR]	Both Good Practice Advice in Planning Notes 2 and 3 were used as set out in the Scoping Report and referenced in the ES chapter.	Agreed
13	Approach to assessment	Historic England was keen to see that the assessment incorporates appropriately extensive buffer zones and areas of exclusion in relation to the four grade II RPGs which have been identified as being of medium value. Historic England recommended that the assessment includes the significance of the Parks and Gardens and their constituent features and setting. [Response to PEIR]	The Desk-based assessment concluded that the proposed development had the potential for impact on the grade II Terling RPG which was taken forward for further assessment. The DBA also considered the grade II Hatfield Priory; New Hall, and Boreham RPGs and concluded that due to their distance from the Site combined with the screening provided by both the natural and built environments the proposed development did not have the potential for impact upon them. These three assets were not therefore taken forward for further assessment in and the Cultural Heritage ES chapter.	Discussion ongoing - Working towards agreement
14	Approach to assessment	Historic England considered there needed to be a closer link between the cultural heritage and landscape/visual assessment chapters, together with a clear assessment, asset-by-asset. [Response to PEIR]	There was close collaboration between the LVIA and cultural heritage teams throughout the assessment. A shared site visit was undertaken, and data was shared throughout. This included sharing draft versions of the relevant parts of the PEIR and ES chapter as works in progress. The two teams liaised on the locations of viewpoints in	Discussion ongoing - Working towards agreement

Ref	Sub-topic	Stakeholder Comment	Applicant's Response	Status
			order to ensure the historic environment was adequately represented and these are referred to within the Cultural Heritage ES chapter. It is the Applicant's view that the two disciplines, though linked, are different and that impact on a heritage asset as a result of a scheme in heritage terms can be very different from impact on the same building in landscape terms. An asset-by-asset assessment across the two disciplines was not therefore undertaken.	
15	Approach to assessment	Historic England requested that assets of the highest level be grouped together separately in the ES chapter. [Response to PEIR]	While the Applicant takes the point that grouping of assets by significance can be helpful it was thought that given the large size of the Site assessment by area would enable the reader to understand the Site and the heritage assets surrounding it better.	Discussion ongoing - Working towards agreement
16	Approach to assessment	Historic England recommended that in the DBA it would be helpful if designated heritage assets are plotted on (a version of) Figs. 10-1, 10-9 and 10-10, in order to show their relationship clearly to the proposed development and wider study area, ZTV and to the selected viewpoints. [Response to PEIR]	The cultural heritage figures are quite dense with large numbers of assets shown over a wide area. For this reason it was felt that addition of the ZTVs and viewpoints would further complicate things and cross referencing would give a clearer idea of the situation.	Discussion ongoing - Working towards agreement
17	Approach to assessment	Historic England requested that the ES demonstrate stated impacts through the use of appropriate photomontages and rendered images. [Response to PEIR]	Photomontages and rendered images were used in the LVIA ES chapter and referenced in the Cultural Heritage ES chapter.	Agreed
18	Approach to assessment	Historic England requested that there be justification of the choice of viewpoints in Chapter 10 (LVIA). They noted that there were no viewpoints for the scheduled monument at Great Loyes.	The Great Loyes moated site and fishpond is located over 2km from the Scheme and separate from it by the River Ter and the medieval settlement of Terling. The setting of the scheduled monument is not understood to incorporate the	Discussion ongoing - Working towards agreement

Ref	Sub-topic	Stakeholder Comment	Applicant's Response	Status
		[Response to PEIR]	Site and as such a viewpoint was not considered necessary on heritage grounds.	
19	Approach to assessment	Historic England requested the ZTV be extended slightly to the east because a scheduled monument (Blunts Hall Ringwork, LEN 1012098) lies just beyond the limit of the analysis. [Response to PEIR]	The scheduled monument of Blunts Hall Ringwork is situated on western edge of the River Brain valley, which is separated from the Scheme by the high ground between the River Brain and the River Ter. Longfield Solar Energy Farm Ltd considers the application of professional judgement by its specialists to be robust in that there is no potential for intervisibility or impacts to the scheduled monument through changes to setting.	Discussion ongoing - Working towards agreement
20	Approach to assessment	Historic England advised the need for comprehensive assessment, evaluation and deposit modelling to establish the potential for buried archaeological remains across all areas of the development which would involve ground works. They recommended the work be undertaken to inform the EIA in order that the application meets the requirements of the National Policy Statement for Energy on the Historic Environment (paras 5.8.8-10). [Response to PEIR]	The DCO submission is supported by a Heritage Desk Based Assessment, an Aerial Investigation and Mapping assessment, the results of a geophysical survey, and the results of a trial trench evaluation. This is in line with the requirements of the National Policy Statement for Energy on the Historic Environment (paras 5.8.8-10).	Agreed
21	Provision of information	Historic England requested that copies of the full survey reports (Geophysics, Aerial Imaging and Lidar) be included in the appendices to allow the information to be critically assessed. [Response to PEIR]	The full results of the geophysical survey are submitted as Vol. 2 Appendix 7C.	Agreed
22	Provision of information - Geophysical survey	Requested that information be provided about the extent of the geophysical survey carried out and the size/proportion of the site that could not be investigated.	The full results of the geophysical survey are submitted as Vol. 2 Appendix 7C.	Agreed

Ref	Sub-topic	Stakeholder Comment	Applicant's Response	Status
		[Response to PEIR]		
23	Provision of information	Requested that information regarding the resolution of the Lidar data utilised be provided. [Response to PEIR]	The resolution for the LiDAR composite was 1m for the DTM and 1m the DSM data obtained via the Environment Agency. This is set out in Vol. 2 Appendix 7B.	Agreed
24	Provision of information	Requested more information as to the scope of the proposed trial trenching. [Response to PEIR]	The archaeological trial trenching evaluation report is appended to the ES as Appendix 7D Trial Trenching Report [EN010118/APP/6.2].	Agreed
25	Approach to assessment	Recommended that statements about the palaeoenvironmental potential of the proposed development area are reassessed following the trial-trench evaluation works. [Response to PEIR]	Paleoenvironmental potential has been assessed following the completion of the trial trenching and it was confirmed that the 'moat' contained no waterlogged deposits with a potential to contain paleoenvironmental remains. These are discussed in the DBA presented as Appendix 7A Heritage Desk Based Assessment [EN010118/APP/6.2].	Agreed
26	WSI – scope	Advised that the scope of works (WSI) for the trial-trenched evaluation be agreed with ECC Place Services and would welcome the opportunity to comment on the extent of the trial-trenched evaluation. [Response to PEIR]	The WSI for trial trenching was agreed with ECC Place Services. Historic England has not been consulted on the extent of pre-determination trial trenching evaluation but will be consulted for the Overarching Written Scheme of Investigation which will be submitted as the detailed mitigation strategy.	Agreed
27	Provision of information	Requested that the ES provide detailed information about the level of groundworks relating to the proposed solar farm, and the impact on the significance of any below ground archaeological remains should be assessed against this information.	Detailed proposal for groundworks is presented in the Environmental Statement [EN010118/APP/6.1] and the impacts to the archaeological resource are assessed in the Chapter 7 Cultural Heritage of the Environmental Statement.	Agreed

Ref	Sub-topic	Stakeholder Comment	Applicant's Response	Status
		[Response to PEIR]		
28	Mitigation strategy	Requested that the mitigation strategy be designed to minimise impact, either by avoidance and/or by record. [Response to PEIR]	Identified significant archaeological remains were avoided wherever possible. A multi-occupation site near Toppinghoe Hall and prehistoric remains near Ringers Farmhouse were both avoided entirely. Where impacts are anticipated, a programme of archaeological recording will take place. This will be set out in the Overarching WSI and secured by a DCO Requirement.	Agreed
29	Draft WSI	Would welcome the opportunity to review and comment on the overarching WSI detailing proposed mitigation works (7.9.3-7.9.4). [Response to PEIR]	The overarching WSI will be submitted in line with the scope set out within the OCEMP [EN010118/APP/7.10]. Historic England note that they will not be commenting on non-designated assets in their written representation and that they will defer to the LPA and their advisors. Both Historic England and ECC Place Services will nevertheless be consulted and the scope of the overarching WSI approved. All efforts will be made to avoid or minimise impact to the archaeological potential.	Agreed
30	Consultation	Would expect to be consulted upon the assessment work, and the results, prior to the submission of the full application. [Response to PEIR]	An application has been made for further consultation which, if taken up, will include the assessment work.	Discussion ongoing - Working towards agreement
31	Scope of assessment	Recommended that issues such as pollution or changes to water quality also discuss the impacts on the historic environment. [Response to PEIR]	The Scheme is not expected to result in changes to air or water quality which could result in impacts to the historic environment. As such, while these changes have been assessed in Chapter 9: Water Environment and Chapter 14: Air Quality, detailed impacts to the historic environment are not	Discussion ongoing - Working towards agreement

Ref	Sub-topic	Stakeholder Comment	Applicant's Response	Status
			considered necessary by Longfield Solar Farm Ltd's heritage specialists.	
32	Scope of assessment	Recommended that the heat emitted from the buried cables is considered in terms of the impacts that this may have on any archaeological remains present. [Response to PEIR]	The heat from buried cables was discussed and it will not extend to a significant degree beyond the extent of the utility trenches in which they would be placed. As all archaeological remains will have been removed, this has not been further considered.	Discussion ongoing - Working towards agreement
33	Scope of assessment	Recommended that further viewpoints be agreed and photomontages and rendered images produced to support setting and LVIA analysis. [Response to PEIR]	An extensive set of viewpoints was produced after consultation between the heritage and LVIA teams taking into account the heritage assets in the vicinity of the Site and photomontages produced.	Discussion ongoing - Working towards agreement
34	Consultation	Recommended that opportunities be identified for Statutory Consultee input to fieldwork survey strategies and any consents required. [Response to PEIR]	The evaluation fieldwork was agreed in consultation with Essex County Council Place Services. Historic England note that it will not be commenting on non-designated assets in its written representation and that it will defer to the LPA and their advisors. Historic England will, however, be consulted as part of the development of a detailed mitigation strategy to be submitted as an Overarching Written Scheme of Investigation (OWSI) during examination.	Discussion ongoing - Working towards agreement
35	Archaeology	Requested that archaeological survey and evaluation fieldwork be completed and reported on. [Response to PEIR]	The DCO submission is supported by a Heritage Desk Based Assessment, an Aerial Investigation and Mapping assessment, the results of a geophysical survey, and the results of a trial trench evaluation. This is in line with the requirements of the National Policy Statement for	Agreed

Ref	Sub-topic	Stakeholder Comment	Applicant's Response	Status
			Energy on the Historic Environment (paras 5.8.8-10).	
36	Approach to assessment	Noted the importance of continuing to identify the significance of assets and using this to evolve a baseline assessment and subsequent heritage and Environmental Statements and management plans in order to provide a strong basis for design decisions. Recommended there must be a continued focus on using setting, landscape and archaeological approaches to analysis. Expectation that the Scheme actively respond to historic environment concerns. [Response to PEIR]	The Heritage Desk Based Assessment that supports the DCO submission contains an assessment of the significance of all heritage assets upon which the proposed scheme has the potential for impact, which information was utilised to inform the evolving design.	Agreed
37	Justification for harm	Noted that where there is harm to the significance of heritage assets there is a requirement to avoid or minimise any conflict between the heritage assets' conservation and any aspect of the proposal and to have clear and convincing justification for any harm. [Response to PEIR]	Where harm was likely, alternative designs have been suggested and implemented to minimise the impact. This has included the exclusion of areas of land from the developable area of the scheme, setbacks between areas to be developed and heritage assets, planting of new areas of woodland and hedges. Identified significant archaeological remains were avoided wherever possible. A multi-occupation site near Toppinghoe Hall and prehistoric remains near Ringers Farmhouse were both avoided entirely. Where impacts are anticipated, a programme of archaeological recording will take place. This will be set out in the Overarching WSI and secured by a DCO Requirement.	Agreed
38	Provision of information	Historic England is looking to confirm that a Desk-based Assessment, an assessment of setting and impact, a geophysical survey and a trial trenched evaluation have all been carried out.	The assessment of impacts, including through changes to setting, are presented within Chapter 7: Cultural Heritage of the Environmental Statement. The results of the Desk-based assessment, geophysical survey, and trial	Agreed

Ref	Sub-topic	Stakeholder Comment	Applicant's Response	Status
		[Relevant Representation]	trenching evaluation are presented in Volume 2, Appendix 6A, 6C, 6D, and 6F. These have been approved in consultation with Essex County Council Place Services.	
39	Mitigation	Historic England notes that its primary consideration is in relation the Scheme's impact on the significance of designated assets in the vicinity. [Relevant Representation]	The Scheme's impact on designated assets has been fully assessed within the Cultural Heritage ES Chapter. The assessment is founded on an understanding of each asset's significance and the contributions of setting to that significance as set out in the Desk-based Assessment.	Agreed
40	Less than substantial harm	Historic England acknowledges that the harm is less than substantial and acceptable in policy terms is keen to ensure that adequate mitigation is implemented to reduce the harm wherever possible. [Relevant Representation]	Mitigation for the reduction of harm to heritage assets has been implemented throughout the Scheme. This has included the exclusion of areas of land from the developable area of the scheme, setbacks between areas to be developed and heritage assets, planting of new areas of woodland and hedges.	Agreed
41	Non-designated assets	Historic England notes that it will not be commenting on non-designated assets in its written representation and that it will defer to the LPA and their advisors. [Relevant Representation]	All archaeological matters have been agreed with Essex County Council's Places Services in line with Historic England's approach.	Agreed

4. Signatories

4.1 Overview

4.1.1 The above SoCG is agreed between Longfield Solar Farm Limited (LFS Limited) (the Applicant) and Historic England, as specified below.

Duly authorised for and on behalf of **Longfield Solar Limited**

Name

Job Title

Date

Signature

Duly authorised for and on behalf of **Historic England**

Name

Job Title

Date

Signature