



# Longfield Solar Farm

Statement of Common Ground – Historic England

Deadline 4

Document Reference : EN010118/EX/8.4(C)

Revision 4.0

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Longfield Solar Energy Farm Ltd

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# 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

- 1.3.1 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                      | <p>Initial response from consultation. Included agreement of assessment methodology with specific note of:</p> <p>involvement of Chelmsford City Council and Place Services and County Archaeologist in development of scheme;</p> <p>effect of alteration of drainage patterns on below ground archaeological remains;</p> <p>use of qualitative and expert judgement in addition to EIA matrices;</p> <p>assessment of the potential impact of the scheme's associated activities on perceptions, understanding and appreciation of the heritage assets in the area;</p> <p>demonstration of exploration of alternative sites for the proposed solar farm.</p> |
| 01/06/2021 to 13/07/2022 | Statutory consultation - Response to PEIR | <p>Consultation response to PEI Report. Points noted included:</p> <p>recommendation of use of GPA2 and GPA3;</p> <p>recommendation to include assessment of four grade II RPGs;</p> <p>recommendation of a closer link between cultural heritage and LVIA;</p> <p>recommendation to group assets of the highest designation;</p>  |

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.

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

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|                   |                        |  |
|-------------------|------------------------|--|
| <b>18/08/2022</b> | Written Representation | Impacts to highly graded designated heritage assets within the 1km study area.<br><br>Agreement that the visualisations and accompanying analysis in the Environmental Statement provide sufficient information to allow the level of harm to be |
|-------------------|------------------------|--|

established and the balance to be weighed by the determining authority.

Statement that harm resulting from the Proposed Development would be less than substantial.

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**09/09/2022** Teams meeting

Historic England's Written Representation (18/08/2022) read and discussed.

Agreement that the contents of the Written Representation allowed the status of a number of the sub-topics in the SoCG to be moved from Under discussion to Agreed.

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   | <b>Methodology</b>  | 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.<br>[Scoping]                   | The impact assessment in both the PEIR and the ES chapter is aligned with the advice in the NPPF. Reasonable efforts were made to ensure all elements which contribute to the significance of assets including the contribution made by setting have been assessed in the Cultural Heritage ES Chapter <b>[EN010118/APP/6.1(B)]</b> .   | <b>Agreed</b> |
| 2   | <b>Consultation</b> | 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.<br>[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. | <b>Agreed</b> |

| Ref | Sub-topic                  | Stakeholder Comment   | Applicant's Response   | Status |
|-----|----------------------------|---|--|--------|
| 3   | Drainage                   | <p>The assessment should consider, where appropriate, the likelihood of alterations to drainage patterns that might lead to in situ decomposition or destruction of below ground archaeological remains and deposits, and where it can also lead to subsidence of buildings and monuments.<br/>[Scoping]</p>  | <p>Changes to groundwater levels and drainage which may alter the preservation of archaeological remains or impact buildings and monuments have 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 Chapter 9 (Water) of the ES and applied to cultural heritage.</p> | Agreed |
| 4   | Setting of heritage assets | <p>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.</p> | <p>Reasonable efforts were made to assess all potential impacts on the historic environment as a result of the proposed scheme. These are presented in the ES chapter <b>[EN010118/APP/6.1(B)]</b> and includes impacts stemming from construction, operation and dismantling.</p>   | Agreed |



| Ref | Sub-topic                        | Stakeholder Comment  | Applicant's Response  | Status |
|-----|----------------------------------|--|---|--------|
|     |                                  | [Scoping]  |   |        |
| 5   | 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.<br>[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 presented in Section 7.8 of the ES <b>[EN010118/APP/6.1(B)]</b> .  | Agreed |
| 6   | 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. | Potential impacts on all known cultural heritage assets, whether designated or non-designated, have been assessed. Further archaeological evaluation will be carried out once detailed designs indicating the location of intrusive activities are available in order to assess the presence/absence of non-designated archaeological remains. This evaluation, and subsequent mitigation, is secured through a OWSI <b>[EN010118/EX/8.11]</b> to be submitted at Deadline 2 which will be agreed with the LPA. This will then be secured through a DCO requirement. Should significant archaeological remains be identified, impacts will be assessed and mitigation carried out in line with the OWSI <b>[EN010118/EX/8.11]</b> . | Agreed |

| Ref | Sub-topic              | Stakeholder Comment   | Applicant's Response   | Status |
|-----|------------------------|---|--|--------|
|     |                        | [Scoping]   |  |        |
| 7   | 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.<br>[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 ES Chapter 2 The Scheme <b>[EN010118/APP/6.1(A)]</b> and ES Chapter 3, Alternatives and Design Evolution <b>[EN010118/APP/6.1]</b> . | Agreed |
| 8   | 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.<br>[Response to PEIR] | This is acknowledged and agreed.   | Agreed |

| Ref | Sub-topic                     | Stakeholder Comment  | Applicant's Response   | Status        |
|-----|-------------------------------|--|--|---------------|
| 9   | <b>Approach to assessment</b> | 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.<br>[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 under Section 7.2 <b>[EN010118/APP/6.1(B)]</b> .   | <b>Agreed</b> |
| 10  | <b>Approach to assessment</b> | 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.<br>[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 <b>[EN010118/APP/6.1(B)]</b> . | <b>Agreed</b> |

| Ref | Sub-topic                     | Stakeholder Comment   | Applicant's Response   | Status        |
|-----|-------------------------------|---|--|---------------|
|     |                               | <p>Historic England acknowledge that, due to the level of intervening topography and screening, no impact in relation to these designated assets is anticipated and accept that for this reason they have not been assessed in further detail in Appendix 7A, Heritage Desk Based Assessment of the Environmental Statement. [Written Representation]</p> |  |               |
| 11  | <b>Approach to assessment</b> | <p>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.<br/>[Response to PEIR]</p> <p>Historic England have subsequently stated that they were pleased to see that the</p>  | <p>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 order to ensure the historic environment was adequately represented and these are referred to within the Cultural Heritage ES chapter <b>[EN010118/APP/6.1(B)]</b>.</p> | <b>Agreed</b> |

| Ref | Sub-topic                     | Stakeholder Comment  | Applicant's Response  | Status        |
|-----|-------------------------------|--|---|---------------|
|     |                               | <p>Environmental Statement included specific Cultural Heritage and Landscape and Visual Amenity Chapters (ES Volume Chapters 7 and 10) in addition to visualisations and photomontages.<br/>[Written Representation]</p>   |   |               |
| 12  | <b>Approach to assessment</b> | <p>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.<br/>[Response to PEIR]</p> <p>Historic England have subsequently stated that they were pleased to see that the Environmental Statement included specific Cultural Heritage and Landscape and Visual Amenity Chapters (ES Volume Chapters 7</p> | <p>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 Site and as such a viewpoint was not considered necessary on heritage grounds.</p> | <b>Agreed</b> |

| Ref | Sub-topic                     | Stakeholder Comment  | Applicant's Response  | Status        |
|-----|-------------------------------|--|---|---------------|
|     |                               | <p>and 10) in addition to visualisations and photomontages.<br/>[Written Representation]</p>   |   |               |
| 13  | <b>Approach to assessment</b> | <p>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.<br/>[Response to PEIR]</p> <p>Historic England have subsequently stated that they were pleased to see that the Environmental Statement included specific Cultural Heritage and Landscape and Visual Amenity Chapters (ES Volume Chapters 7 and 10) in addition to visualisations and photomontages.<br/>[Written Representation]</p> | <p>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. is no potential for intervisibility or impacts to the scheduled monument through changes to setting. This can be further discussed through possible expansion of the ZTV or visualisations if deemed necessary.</p> | <b>Agreed</b> |

| Ref | Sub-topic              | Stakeholder Comment  | Applicant's Response  | Status |
|-----|------------------------|--|---|--------|
| 14  | 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).<br>[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 |
| 15  | 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  | 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 [EN010118/EX/8.11].         | Agreed |

| Ref | Sub-topic                | Stakeholder Comment   | Applicant's Response  | Status |
|-----|--------------------------|---|---|--------|
|     |                          | extent of the trial-trenched evaluation.<br>[Response to PEIR]  |   |        |
| 16  | 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.<br>[Response to PEIR] | Detailed proposal for groundworks is presented in the Environmental Statement <b>[EN010118/APP/6.1]</b> and the impacts to the archaeological resource are assessed in the Chapter 7 Cultural Heritage of the Environmental Statement <b>[EN010118/APP/6.1(A)]</b> .  | Agreed |
| 17  | Mitigation strategy      | Requested that the mitigation strategy be designed to minimise impact, either by avoidance and/or by record.<br>[Response to PEIR]  | Significant archaeological remains identified within the Scheme 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.<br><br>The proposed mitigation is discussed in sections 7.7 and 7.8 and shown on the Outline Environmental Management Plan (OLEMP) Sheets A and B <b>[EN010118/APP/7.13(A)]</b> . | Agreed |
| 18  | Draft WSI                | Would welcome the opportunity to review and comment on the overarching WSI detailing proposed   | The overarching WSI will be submitted in line with the scope set out within the OCEMP <b>[EN010118/APP/7.10(A)]</b> .   | Agreed |



| Ref | Sub-topic                  | Stakeholder Comment  | Applicant's Response  | Status        |
|-----|----------------------------|--|---|---------------|
|     |                            | <p>mitigation works (7.9.3-7.9.4).<br/>[Response to PEIR]</p> <p>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.</p>   | <p>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.</p> |               |
| 19  | <b>Scope of assessment</b> | <p>Recommended that further viewpoints be agreed and photomontages and rendered images produced to support setting and LVIA analysis.<br/>[Response to PEIR]</p> <p>Historic England have subsequently stated that they were pleased to see that the Environmental Statement included specific Cultural Heritage and Landscape and Visual Amenity Chapters (ES</p> | <p>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.</p>               | <b>Agreed</b> |

| Ref | Sub-topic    | Stakeholder Comment  | Applicant's Response  | Status |
|-----|--------------|--|---|--------|
|     |              | Volume Chapters 7 and 10) in addition to visualisations and photomontages.<br>[Written Representation]   |   |        |
| 20  | Consultation | Recommended that opportunities be identified for Statutory Consultee input to fieldwork survey strategies and any consents required.<br>[Response to PEIR]<br><br>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<br>[Relevant Representation]. | The evaluation fieldwork was agreed in consultation with Essex County Council Place Services.<br>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<br><b>[EN010118/EX/8.11].</b>    | Agreed |
| 21  | Archaeology  | Requested that archaeological survey and evaluation fieldwork be   | 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 |

| Ref | Sub-topic                     | Stakeholder Comment   | Applicant's Response  | Status        |
|-----|-------------------------------|---|---|---------------|
|     |                               | completed and reported on.<br>[Response to PEIR]  |   |               |
| 22  | <b>Approach to assessment</b> | <p>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.</p> <p>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.</p> <p>[Response to PEIR]</p> | <p>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.</p> | <b>Agreed</b> |

## 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 Matt Bussey  
Job Title Project Manager  
Date 19/10/2020

Signature



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

Name Dr Will Fletcher  
Job Title Team Leader: Development Advice  
Date 31/10/2022

Signature

