



Mallard Pass

Solar Farm

Mallard Pass Solar Farm

**Applicant's Responses to
Interested Parties' Deadline 2
Submissions - Historic
Environment**

Deadline 3 - June 2023

EN010127

EN010127/APP/9.22

Applicant's Response to Interested Parties' Deadline 2 Submissions on Historic Environment

Parties Raised	Sub-Theme	Issues Raised	Applicant's Response
REP2-044(LIR) REP2-045(FWQ) REP2-046(WR) REP2-096 REP2-056 REP2-230 REP2-170 REP2-169 REP2-231 REP2-066 REP2-160 REP2-090	Impact on cultural heritage assets/ Archaeological remains	Concern for the significant negative impacts on potential buried archaeology and other cultural heritage assets as a result of the Proposed Development. The assessment approach taken has been dismissive and expresses a wholesale devaluation of cultural heritage.	The Applicant is of the opinion that the assessment of the effects of the Proposed Development on cultural heritage assets is appropriate and proportionate. The heritage consultants engaged in undertaking the assessment work are highly experienced (with over 20 years of practical and applicable involvement in impact assessment). The Applicant strongly refutes the unfounded remarks from LCC regarding a 'dismissive' approach and 'devaluation' of the cultural heritage resource. Furthermore, the ES was independently reviewed by Stantec, on behalf of RCC and SKDC as set out in Appendix D. This review confirmed that the approach to Cultural Heritage through the EIA process was in compliance with applicable EIA legislation and associated guidance and it comprehensively assessed the likely significant effects of the proposed development.
REP2-044(LIR) REP2-045(FWQ) REP2-046(WR) REP2-090		The cultural heritage impact of this development is, diminished and descoped in subjective statements that dismiss the potential of, and impact upon, cultural heritage which is contrary to archaeological best practice as well as the national and local policy.	
REP2-167 REP2-190 REP2-090		Mallard Pass will detract from the ancient churches and buildings.	The effect of the Proposed Development on the heritage significance of any proximate churches and buildings (ancient or otherwise), has been assessed and described, in accordance with: <ul style="list-style-type: none"> - paragraph 5.8.8 of EN1 and paragraph 194 of the NPPF (2021) - the guidance issued by ClfA (2020) - Historic Environment Good Practice Advice in Planning Note 2 (Historic England 2015) and - Advice Note 12: Statements of Heritage Significance: Analysing Significance in Heritage Assets (Historic England 2019).

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			<p>This is reported within paragraph 8.2.30 of the ES: Cultural Heritage Chapter [APP-38]. This matter is further explored within the Applicants response to ExA Q6.0.11.</p> <p>The Applicant is of the opinion that no harm would come to the heritage significance of any proximate ancient churches and buildings.</p>
<p>REP2-209, REP2-211</p>		<p>Concern that the project will significantly harm the setting of Burghley House (Grade II) and Hollywell Hall Park, Greatford Hall and Uffington Park.</p>	<p>The effect of the Proposed Development on the significance of identified Registered Parks and Gardens, has been assessed and described, in accordance with:</p> <ul style="list-style-type: none"> - paragraph 5.8.8 of EN1 and paragraph 194 of the NPPF (2021) - the guidance issued by ClfA (2020) - Historic Environment Good Practice Advice in Planning Note 2 (Historic England 2015) and - Advice Note 12: Statements of Heritage Significance: Analysing Significance in Heritage Assets (Historic England 2019). <p>This is reported within paragraph 8.2.30 of the ES: Cultural Heritage Chapter [APP-38]. This matter is further explored within the Applicants response to ExA Q6.0.11.</p> <p>The Applicant is of the opinion that no harm would come to the heritage significance of the identified Registered Parks and Gardens.</p>
<p>REP2-170</p>		<p>Concerns about the disturbance and possible destruction of Archaeological sites and remains under many of the proposed sites due to heavy traffic, trenching for cabling and securing screws for equipment being driven into the ground.</p>	<p>The Applicant is of the opinion, as reported within paragraphs 8.4.2 to 8.4.6 within Chapter 8: Cultural Heritage [APP-038], that there are no anticipated significant effects (in respect to buried archaeological remains).</p> <p>Further details on the potential impacts of piling ('securing screws') are provided in the Applicants response to ExA Q6.0.4.</p> <p>Further details on the measures to protect buried archaeological remains during construction is given in the Applicants response to ExA Q6.0.13 in reference to the content within the oCEMP [APP-207].</p>

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REP2-047(WR), REP2-048(LIR), REP2-050(FWQ) REP2-044(LIR) REP2-045(FWQ) REP2-046(WR) REP2-195, REP2-196, REP2-090	Insufficient assessment	Concern that the assessment undertaken by the developer is inadequate and incomplete. Concern that it does not provide enough information to fully understand the impacts of the proposed development, which results in an inability to adequately inform mitigation proposals.	The Applicant is of the opinion that sufficient assessment (evaluation) has been undertaken to design suitable mitigation and thus inform the decision, in accordance with industry good practice and aligned with policy. Specifically, EN-3 notes (draft 2023 in relation to Solar Photovoltaic Generation projects, at paragraph 3.10.100; 3.10.105; 3.10.106) that below ground impacts are "generally limited"; that "in some instances, field studies may include intrusive investigative work" and that this should be "proportionate". This matter is presented within Chapter 8: Cultural Heritage [APP-038] paragraphs 8.4.2 - 8.4.6 (re impacts) and section 8.3 re mitigation.
REP2-169, REP2-066, REP2-090		The assessment is insufficient and underestimates the impact to historic landscape.	The ES was independently reviewed by Stantec, on behalf of RCC and SKDC. This review confirmed that the approach to Cultural Heritage through the EIA process was in compliance with applicable EIA legislation and associated guidance and it comprehensively assessed the likely significant effects of the proposed development (including the historic landscape).
REP2-047(WR), REP2-048(LIR), REP2-050(FWQ)	Trial trenching	The evaluation tools used so far are insufficient to inform a detailed mitigation plan. The principal construction compound has not been evaluated and the lack of trial trenching means it is unclear whether the proposed approach is achievable. Even utilising a 'no-dig' method could result in damage to archaeological features.	The Applicant is of the opinion that sufficient assessment (evaluation) has been undertaken to design suitable mitigation and thus inform the decision, in accordance with industry good practice and aligned with policy. The Applicants response to ExA Q6.0.6 identifies the mitigation work that would be required at the Onsite Substation. The Outline WSI will detail the specific work to be carried out at the Onsite Substation and at the locations of the construction compounds. Production of this is secured by the DCO and the Applicant is working on developing a draft WSI to share with the LPAs as soon as possible.
REP2-044(LIR) REP2-045(FWQ) REP2-046(WR)		The trenching programme undertaken focuses on only 209 trenches being excavated meaning there are vast areas of the site which have had	The Applicant is of the opinion that sufficient 'trenching' has been undertaken to inform the understanding of potential impacts on buried archaeological remains. The +200 evaluation trenches were targeted to explore those areas most likely contain important buried archaeological remains. With the

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<p>REP2-047(WR), REP2-048(LIR), REP2-050(FWQ)</p>		<p>no evaluation, the trenching covers 0.21% of the site whereas the recommended is 3%</p>	<p>exception of three localised areas (described in the response to ExA Q6.0.5) no significant and extensive buried archaeological remains have been identified.</p> <p>It is incorrect to describe 'vast areas' (or any substantial areas) as having had 'no evaluation'. Desk-based assessment and geophysical survey has been completed across the entirety of the Solar PV site and beyond to nearly all of the Order Limits, too.</p> <p>A standard percentage of trial trenching, as a sample size of a development area, does not conform to any industry guidance or good practice. No single 'percentage sample' has been adopted for DCO solar schemes in England and Wales. A bespoke and informed strategy for each location, based on the results of the iterative suite of prospecting (desk-based and site based) techniques is best practice.</p> <p>Thus emerging national policy is rightly recognising the need to design bespoke evaluative (trenching) strategies and not seek the employment of a 'standard percentage'.</p> <p>Specifically, EN-3 notes (draft 2023 in relation to Solar Photovoltaic Generation projects, at paragraph 3.10.100; 3.10.105; 3.10.106) that below ground impacts are "generally limited"; that "in some instances, field studies may include intrusive investigative work" and that this should be "proportionate". This matter is presented within Chapter 8: Cultural Heritage [APP-038] paragraphs 8.4.2 - 8.4.6 (re impacts) and section 8.3 re mitigation.</p> <p>Therefore, the Applicant is of the opinion that the assessment work completed is proportionate and fully compliant with policies of EN-1 and EN-3 (including in the 2023 draft as stated in Paragraphs 3.10.98 to 3.10.110, 3.10.128, 3.10.129, & 3.10.151), the NPPF and the EIA Regulations. The Applicant is</p>

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<p>REP2-044(LIR) REP2-045(FWQ) REP2-046(WR)</p>		<p>Concern that the extremely limited trenching undertaken results in insufficient baseline evidence for an informed mitigation strategy to deal with the developmental impact on surviving archaeology. The Supplementary Trial Trenching Report (which was submitted by Procedural Deadline A and accepted at the discretion of the ExA - Document ref: PDA-014) is simply the final report following on from the Interim Trenching Report contained within Appendix 8.6 and no further field evaluation has been undertaken.</p>	<p>of the opinion that this assessment has been completed and suitable mitigation can be delivered.</p> <p>The Applicant is of the opinion that the suite of mitigation options available, alongside the extensive programme of desk-based, geophysical and trial trenching is sufficient to allow for the design of an effective mitigation strategy. The Supplementary Trial Trenching Report sets out a full report on the full extent of surveys undertaken.</p>
<p>REP2-044(LIR) REP2-045(FWQ) REP2-046(WR)</p>	<p>Mitigation strategy</p>	<p>Concern with the mitigation methods proposed. Many understand the methods to be 'assumptions that the piles would probably avoid most archaeological features and that anything that was destroyed is probably not of much importance'.</p> <p>Such assumptions are unfounded and so cannot be accepted as an effective mitigation strategy/approach.</p>	<p>The generally limited effects of solar PV and specifically piling is understood across the industry and best practice, and is now set out within EN-3 (draft 2023 – 3.10.100).</p> <p>The Applicant is of the opinion that suite of mitigation options available, alongside the extensive programme of desk-based, geophysical and trial trenching is sufficient to allow for the design of an effective mitigation strategy. The mitigation measures proposed are standard archaeological measures of the sort that have been accepted on solar schemes across the UK; and LCC have given no evidence so as to suggest why they would not work.</p>
<p>REP2-044(LIR) REP2-045(FWQ) REP2-046(WR)</p>		<p>Further clarification requested on the mitigation WSI (appended to evaluation report) which has been the basis for the mitigation strategy.</p>	<p>The Outline WSI is being developed and will be shared with the Local Planning Authorities, with a view to seeking their engagement and agreement on the document.</p>

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REP2-044(LIR) REP2-045(FWQ) REP2-046(WR)		Concerns with the lack of sufficient site-specific evaluation ahead of identifying mitigation measures for cultural heritage assets. Effective mitigation requires sufficient site-specific evaluation to know where the archaeology is and its extent, character, significance and depth.	The Applicant is of the opinion that the suite of mitigation options available, alongside the extensive programme of desk-based, geophysical and trial trenching is sufficient to allow for site specific responses. The response to ExA Q6.0.5 provides specific examples of localised information to inform the finer grain of detail within the mitigation strategy, which can be developed during the detailed design,
REP2-044(LIR) REP2-045(FWQ) REP2-046(WR)	Policy Compliance	Concern that the Proposed Development does not meet the relevant planning policy and guidance in relation to the impact on local cultural heritage assets. Particularly including Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (Regulation 5 (2d)), NPS EN-1 (Section 5.8) and the National Planning Policy Framework and Policy EN6 of the South Kesteven Local Plan. Therefore, based on the information available the development would have a significant negative impact on cultural heritage within Lincolnshire, in particular in respect of buried archaeology.	The Applicant is of the opinion, as reported within paragraphs 8.4.2 to 8.4.6 within Chapter 8: Cultural Heritage [APP-038], that there are no anticipated significant effects (in respect to buried archaeological remains). LCC suggests a conflict / non-compliance with national and local policy; however, no specific evidence is offered to suggest where these impacts will occur and on what assets or how the Proposed Development is non-compliant with policy. Furthermore, LCC does not offer any evidence on the nature / severity of impacts. The Applicant has considered policy compliance in the Planning Statement [APP-302] and its updated Policy Tracker at [REP2-042].
REP2-044(LIR) REP2-045(FWQ) REP2-046(WR)	Approach to Cultural Heritage	Unethical approach to cultural heritage throughout the planning process with insufficient evaluation, assessment and mitigation which devalues the topic.	The Applicant is of the opinion that all of the completed assessment work has been undertaken to a high standard, adhering to relevant guidance and good practice. The Applicant strongly refutes the unfounded accusation of an unethical approach to the assessment of cultural heritage; and notes that no suggestion of this sort was put forward in the ES independent review by Stantec, on behalf of RCC and SKDC.
REP2-047(WR), REP2-048(LIR), REP2-050(FWQ)	ExQ1 - Q6.0.2 - archaeology includes the requirement for the submission	We have reviewed the suggested archaeological requirement, and we do not think it is adequate as it only makes mention of one further phase of archaeological work and a single Written Scheme of Investigation (WSI). At least two stages of archaeological mitigation should be provided as	The adequacy of the completed investigations (i.e., the quantum of trenching) is answered above. The identified approach of a suite of different mitigation options is set out within section 4 of Chapter 8: Cultural Heritage [APP-038] of the ES and the Cultural Heritage Impact Assessment [APP-068]. These works would be discussed with the local planning authorities

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	and approval of a WSI	<p>secured through an agreed archaeological management plan. It is expected that multiple and varied archaeological mitigation requirements are needed, from preservation to excavation, the scope and character of which are as yet uncertain due to the inadequate scope of archaeological evaluation. We have amended the suggested requirements below to mention an Archaeological Management Plan (AMP) rather than a WSI, this AMP would be able to give a basis for further trenching to ensure a satisfactory evaluation and any mitigation then deemed necessary through such evaluative stages. Any further works as laid out in the AMP would then require their own WSI's (such as the trial trenching and mitigation) to ensure satisfactory archaeological investigation, recording, dissemination and archiving.</p> <p>Archaeology</p> <p>10. No phase of the authorised development may commence, and no part of the permitted preliminary works for that phase comprising the intrusive archaeological surveys may start, until a Archaeological Management Plan and subsequent Written Scheme of Investigations have been submitted to and approved in writing by the relevant planning authority for that phase or, where the phase falls within the administrative areas of both the District of South Kesteven and the County of Rutland, both relevant planning authorities.</p>	<p>archaeological advisors and could include a staged programme as identified by RCC.</p> <p>The wording of the Requirement will be developed with RCC (and LCC) as the Applicant continues to develop the Outline WSI for submission at a later deadline. .</p>
<p>REP2-044(LIR) REP2-045(FWQ) REP2-046(WR)</p>		<p>As indicated previously LCC is a relevant planning authority with a statutory remit and role in relation to the historic environment within the County. Therefore, the WSI will need to be approved by LCC (as well as or in addition to) the</p>	<p>It is noted that the wording of the proposed Requirement varies from that proposed by RCC and that paragraph (1) is in any event covered by the current Requirement.</p> <p>It is acknowledged that both options are industry standard (with LCC including more detail within the staged approach) however</p>

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		<p>other relevant planning authorities where works lie within Lincolnshire. The archaeology requirement needs to include evaluation and mitigation phases therefore preconstruction archaeological investigations are required and a mitigation scheme (to be approved after consultation with the relevant planning authority. The draft wording should therefore make this clear and could be revised as follows:</p> <p>(1) No stage of the works may be commenced until for that stage a written scheme of investigation has been submitted to and approved by the relevant planning authority within whose administrative area the stage of works are proposed (i.e. for works taking place within Lincolnshire the relevant planning authorities would be Lincolnshire County Council and South Kesteven District Council and for works taking place in Rutland it would be Rutland County Council)</p> <p>(2) The approved scheme must— (a) identify areas where archaeological work is required; and (b) the measures to be taken to protect, record or preserve any significant archaeological remains that may be found.</p> <p>(3) Pre-construction archaeological investigations and pre-commencement material operations which involve intrusive ground works may take place only in accordance with a specific written scheme of investigation which— (a) is in accordance with the details set out in the written scheme of investigation; and (b) has been submitted to and approved by the relevant planning authority.</p>	<p>the Applicant will consider the wording of this Requirement alongside the development of the Outline WSI for later submission, so does not propose to make any amends to the draft Requirement at this time.</p>

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		<p>(4) Any archaeological works must be carried out by a suitably qualified and competent person or body previously notified to the relevant planning authority.</p> <p>(5) The written scheme of investigation must be implemented as approved.</p>	
<p>REP2-047(WR), REP2-048(LIR), REP2-050(FWQ)</p>		<p>The Supplementary Trial Trenching Report is under review and further comments will be provided, however the main concern raised in respect of the trenching relates to its limited and inadequate scope. This remains the case regardless of the additional submitted information and we still are of the opinion that further trial trenching is needed to inform a suitable mitigation approach.</p>	<p>The Applicant is of the opinion that sufficient information has been submitted to achieve the dual aims of understanding the potential 'significant effects of development' (via the EIA Regs) and to allow for the design and agreement of a suite of mitigation measures to be required via a Requirement of the DCO (as will be set out within the Outline WSI or Archaeological Mitigation Plan). For the reasons given above and below, it is considered that the scope of the trenching undertaken was appropriate.</p>
<p>REP2-044(LIR) REP2-045(FWQ) REP2-046(WR)</p>	<p>ExQ1 - Q6.0.3 – responds to the Supplementary Trial Trenching Report [PDA-014]</p>	<p>The late submission Supplementary Trenching Report is the full or final evaluation report as required in archaeological practice containing outstanding information that was not included in the Interim Trial Trenching Report (Appendix 8.6). No further fieldwork investigations were undertaken and the number of evaluation trenches remains 209. As the scheme is 906 hectares there are vast areas of the impact zone which have had no evaluation and for those sites we do know about their extent has not been determined.</p> <p>The percentage of trenching undertaken across the scheme is 0.21%. Trenching is part of the standard suite of archaeological evaluation and we would expect at least 3% trenching to achieve a reasonable understanding of the archaeological potential across the site.</p>	<p>The Applicant is of the opinion that sufficient 'fieldwork investigations' have been undertaken to inform the understanding of potential impacts on buried archaeological remains. The +200 evaluation trenches were targeted to explore those areas most likely contain important buried archaeological remains. With the exception of three localised areas (described in the response to ExA Q6.0.5) no significant and extensive buried archaeological remains have been identified.</p> <p>It is incorrect to describe 'vast areas' (or any substantial areas) as having had 'no evaluation'. Desk-based assessment and geophysical survey has been completed across the entirety of the Solar PV site and beyond to nearly all of the Order Limits, too.</p> <p>A standard percentage of trial trenching as a sample size does not conform to any industry guidance or good practice. No single 'percentage sample' has been adopted for DCO solar schemes in England and Wales. A bespoke and informed strategy for each location, based on the results of the iterative suite of</p>

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		<p>Archaeology has been identified as surviving across the redline boundary but the extremely limited trenching means there is insufficient baseline evidence to identify significant surviving archaeology and to inform an effective mitigation strategy to deal with the impact on areas of archaeological sensitivity in a reasonable and appropriate way.</p> <p>Post-determination pre-construction evaluation will be required to determine archaeological potential and inform a programme of reasonable appropriate mitigation.</p> <p>Also see LIR and Written Representation</p>	<p>prospecting (desk-based and site based) techniques is best practice.</p> <p>The Applicant is of the opinion that the assessment work completed is proportionate and fully compliant with policies of EN-1 and EN-3 (including in the 2023 draft as stated in Paragraphs 3.10.98 to 3.10.110, 3.10.128, 3.10.129, & 3.10.151), the NPPF and the EIA Regulations. Of particular note (within all of the relevant policies) is the need to understand the specific nature of the potential impacts of the Proposed Development (acknowledged in policy to be 'limited'); to undertake a 'proportionate' assessment of these effects; and to develop mitigation proposals to manage any residual effects. The Applicant is of the opinion that this assessment has been completed and suitable mitigation can be delivered.</p> <p>Furthermore, the ES was independently reviewed by Stantec, on behalf of RCC and SKDC. This review confirmed that the approach to Cultural Heritage through the EIA process was in compliance with applicable EIA legislation and associated guidance and it comprehensively assessed the likely significant effects of the proposed development.</p>
REP2-090	Planning balance	Negative impacts on special architectural and historic interest in the Stamford area weighs heavily against the Proposed Development in the planning balance. It must be accorded considerable importance and weight.	The Applicant is of the opinion that the Proposed Development would result in no adverse effects on the special architectural or historic interest of any Listed Buildings or the Conservation Area within Stamford. No evidence has been put forward by MPAG which identifies specific heritage assets (within Stamford) that may be affected by the Proposed Development.
REP2-090	Study area	A wider study area should have been adopted to capture heritage assets that may potentially be affected by the Proposed Development. Given the length of the site is 2/3 the study area, this does not leave much scope for assessing other important heritage assets and settings.	The study area adopted to assess the effects of the Proposed Development, as reported ES Chapter 8: Cultural Heritage [APP-038] and the Cultural Heritage Impact Assessment [APP-068], conforms to industry guidance and good practice. The assessment followed the 'stepped' process as described within the industry guidance document <i>The setting of heritage assets</i> (Historic England 2017). This scoped and identified the heritage

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			assets (step 1) to be taken forward for more detailed assessment (steps 2 and 3 of the process).
REP2-090	Setting	<p>The focus by the Applicant is on the intervisibility rather than harm to the setting and importance of the historical asset relative to the solar PV site. Setting goes beyond mere intervisibility. It is plain that those seeking to appreciate these assets will be alive to the presence of a vast solar farm in close proximity to the assets, and that will negatively impact on their significance.</p>	<p>Intervisibility (and / or co-visibility) is critical to the understanding of the effects of the Proposed Development on the setting of heritage assets. This has been recognised in a Court of Appeal judgment <i>R (Williams) v Powys CC</i> [2017] EWCA Civ 427, which at paragraph 56 stated that:</p> <p><i>"...if a proposed development is to affect the setting of a listed building there must be a distinct visual relationship of some kind between the two – a visual relationship which is more than remote or ephemeral, and which in some way bears on one's experience of the listed building in its surrounding landscape or townscape. This will often require the site of the proposed development and the listed building to be reasonably close to each other, but that will not be so in every case. Physical proximity is not always essential. This case illustrates the possible relevance of mutual visibility – or "intervisibility", as the judge described it – and also of more distant views from places in which the listed building and the proposed development can be seen together – "co-visibility". as it was described in submissions before us. But this does not mean that the mere possibility of seeing both listed building and development at the same time establishes that the development will affect the setting of the listed building"..."</i></p> <p>The Applicant has carried out its assessment accordingly; and in doing so noted the intervening vegetation and/or distance. Such intervening vegetation or distance would also prevent the 'feeling' that is suggested here, notwithstanding that is not something that needs to be assessed.</p> <p>While it is acknowledged that noises and smells emanating from a Proposed Development could cause adverse effects in environmental terms, this is not relevant for heritage for the Proposed Development, where such impacts are so low and have been assessed generally as not causing significant effects.</p>

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REP2-090	Insufficient assessment	Overall, it is felt that the Applicant has paid 'lip service' to the assessment of archaeological impacts. This is also borne out by the fact that they tried to scope Cultural Heritage out of the EIA.	<p>An industry standard and proportionate desk-based assessment, alongside a comprehensive geophysical survey and programme of archaeological trial trenching, formed part of the baseline data gathering for the archaeological assessment carried out in respect of the Proposed Development. The Applicant is of the opinion due regard and proportionate assessment has been undertaken.</p> <p>The Applicant's proposition to 'scope out' cultural heritage from the EIA process would have in no way influenced the assessment work undertaken as part of the submission. All of the proposed and subsequently undertaken assessment work (desk-based and field investigations re buried archaeology and built heritage) would have been the same with or out with the EIA process. The EIA regulations do not impose a requirement to undertake a more detailed level of assessment The Applicant's preference to exclude cultural heritage from the EIA process was to prevent unnecessary and unhelpful repetition of reporting.</p>
REP2-090		It is clear that the Applicant is underestimating the impact the Proposed Development will have on the archaeology of the proposed site.	The Applicant is of the opinion that a comprehensive assessment of effects has been undertaken that is highly cognisant of the nature of the Proposed Development. The generally limited effects of solar PV, and specifically piling, are understood across the industry and best practice. This understanding and acceptance of the effects being 'generally limited' are now set out within EN-3 (revised draft March 2023 – 3.10.100). This matter is explored in further detail within the Applicant's Responses to ExA Q6.0.04, Q6.0.5 and Q6.0.05.