West Burton Solar Project

Environmental Statement Appendix 13.9: Consultation Response Tables

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Consultation Response Tables

Table App 13.9.1.1: Consultation Prior to PIER

Consultee and	Summary of consultation and engagement	Response
Date	feedback	
Public	Meeting to introduce the project and those involved in the archaeological and heritage assessment process moving forward. Discussion over matters relating to Conservation Areas, Listed Buildings and local history and	An assessment of impacts to the setting of designated assets has been undertaken within the Heritage Statement (Appendix 13.5).
engagement events,	archaeology.	Several fields surrounding Ingleby have been removed from the scheme where baseline line
November 2021	Specific concerns were raised over: Deserted Medieval village of Ingleby and its protected monument and the concern about potential archaeological finds in the fields surrounding this area.	information has identified the potential for buried archaeological deposits to occur.
	Also, about the impact upon the Conservation Areas of Clayworth and Gringley on the Hill.	
Meeting with Historic England and	Initiation meeting to brief Historic England on the scope of the Scheme, assessment approach and potential archaeological survey, evaluation and mitigation strategies.	An assessment of impacts to designated assets has been undertaken within a Heritage Statement (Appendix 13.5).
the applicant 29th Nov 2021	Historic England highlighted need to avoid impacts to designated heritage assets. Ingleby and Stow Park were highlighted during the discussion.	
Marton and Gate Burton Parish Council 9th February 2022	Highlighted that there are several sensitive areas in and around Marton and Gate Burton, for example, Roman and Viking settlements.	A full suite of baseline information has been attained to identify concentrations of archaeological remains (i.e. Roman and Viking settlement activity). This include the results of various desk-based assessments, surveys and archaeological evaluation trenching are detailed in appendices: Desk-Based Research (13.1) Geophysical Surveys (13.2), Geoarchaeological Surveys (13.3), Air Photo and LiDAR Assessment (13.4), Heritage Statement (13.5) and Evaluation Trial Trenching (13.6).
	Welcomed the inclusion of heritage matters in the submitted scoping report and looked forward to ongoing discussions with the	An assessment of impacts to designated assets has been undertaken within a Heritage Statement (Appendix 13.5).
Historic England, Scoping Opinion, 25th February 2022	applicants in respect of both setting effects upon heritage assets and direct impacts upon archaeological remains.	The results of various desk-based assessments, surveys and archaeological evaluation trenching are detailed in appendices: Desk-Based
	Noted the iterative approach to investigations set out in the report and looked forward to early sight of the results of cartographic, geophysical survey, lidar and aerial photographic desiled	Research (13.1) Geophysical Surveys (13.2), Geoarchaeological Surveys (13.3), Air Photo and LiDAR Assessment (13.4), Heritage Statement (13.5) and Evaluation Trial Trenching (13.6).
	and the results of the Applicant's detailed consultation with County Archaeological Curators and Historic Environment Records and Portable Antiquities Scheme Records.	Consultation was undertaken with the Lincolnshire County Council Historic Places Team, as well as the Lincolnshire and Nottinghamshire County and Historic
	Welcomed the early inclusion of a palette of mounting techniques to allow for the avoidance	



Consultee and Date	Summary of consultation and engagement feedback	Response
	of some physical impacts upon buried remains. In addition to the focus upon the impact of the panel arrays, fencing, substations etc., Historic England noted that this and related schemes include significant cable infrastructure for connection to grid. The significance / character / importance of assets on these cable routes will need to be well understood from an early stage such that route options can effectively be weighed and risks managed. Historic England noted that "It is important both that opportunities for reduction in harm are realised and that the time required for archaeological evaluation and reporting is allowed for. Areas of heighted risk (burial sites / wet deposits / former water courses etc) should be afforded early attention as should resources requiring particular methodological approaches such for instance as battlefields or air crash."	Environment Records, and the Finds Liaison Officer for the Portable Antiquities Scheme
	Broxholme medieval settlement and cultivation remains (1016797) Deserted village of North Ingleby (1003570) The medieval bishop's palace and deer park, Stow Park (1019229)	
	"The Inspectorate considers that the potential for direct impacts on heritage assets should be considered. The extent of trial trenching activity should be agreed as part of a Written Scheme of Investigation with Lincolnshire County Council, where possible.	A programme of archaeological evaluation trial trenching was undertaken in accordance with a WSI agreed with Lincolnshire County Council Historic Places Team, and in line with national guidance and the Lincolnshire Archaeology Handbook (2019). The results of which are detailed in Appendix 13.6.
The Planning	The Inspectorate considers that indirect impacts on designated heritage assets should be scoped in as potential for impact remains from changes in drainage patterns, compaction and piling during construction and operation. The baseline information presented in the	Baseline information has successfully identified the presence, absence, extent, form and significance of potential concentration of archaeological features—including within the cable route corridor—which could be impacted upon by the Scheme.
Inspectorate, Scoping Opinion, March 2022	Scoping Report does not include the baseline information for the cable search area. Whilst the Inspectorate acknowledges that the cable route search areas are not finalised, geophysical surveys should be used to inform the design evolution of route corridors, where possible.	Baseline information has been used to inform the design phases of the scheme. Where possible, impacts on identified heritage assets have been mitigated by design, either through the removal of sensitive areas from the Schem or by using construction methodologies that
	Operational impacts upon the settings of heritage assets should be scoped in to the assessment.	enable the avoidance of ground disturbance. An assessment on any impacts to the setting of designated assets has been undertaken within a Heritage Statement (Appendix 13.5).
	The ES should provide evidence to demonstrate that there would be no direct or indirect impact upon designated heritage assets before they can be scoped out of the assessment. Where possible, the evidence base should be agreed with the local planning authority.	Decommissioning is addressed in Section 13.7 of the ES chapter



Consultee and Date	Summary of consultation and engagement feedback	Response
	Direct impacts to designated assets should be assessed unless the potential for effects can be ruled out through relevant surveys.	
	The ES should define an appropriate study area based on the extent of views to and from the Proposed Development and potential impacts on all heritage assets. This should inform the cumulative assessment.	
	There is significant overlap between the cultural heritage and archaeology chapters of the Scoping Report.	
	The assessment of significant effects is proposed to be undertaken for the construction and operational phases of the Proposed Development but decommissioning is not mentioned. The ES should clearly set out if and how decommissioning is to be assessed and any components which may remain following decommissioning."	
	"As part of the Environmental Impact Assessment process, a scoping report should set out the proposed approach regarding Cultural Heritage, and disappointed by the submitted suite of documents with respect to the Archaeology and Built Environment.	Full consultation was undertaken with Lincolnshire County Council between March 2022 and January 2023. This included the submission and approval of WSIs for geophysical survey and trial trench evaluation, which were produced in accordance with national guidance
	Need an approach with sufficient evaluation in order to understand the archaeological potential and to inform a reasonable appropriate mitigation strategy which will need to be submitted with the DCO application.	and the Lincolnshire Archaeology Handbook (2019). Numerous site visits were undertaken across all sites within the Scheme during the trial trench evaluation between July and November 2022.
Lincolnshire County Council (LCC) Historic Place Team	The full suite of available desk-based information needs to be competently assessed including all available records, air photos, LiDAR and local sources. This understanding and the geophysical survey results then inform a robust programme of trial trenching to provide	Lincolnshire County Council were in approval of the quality of works being undertaken and in agreement of the validity of the results of the non-intrusive survey works (in particular the geophysical survey), which had been used to inform the evaluation trial trenching.
(Historic Environment Officer)	evidence for the site-specific archaeological potential of the development.	A full suite of baseline information was assessed and used to inform a programme of trial trench evaluation. The various baseline assessments
25th February 2022	Concerned by the presumption that agricultural techniques have diminished the archaeological potential of these sites without investigation or intrusive evaluation. This is an erroneous approach which is ill-informed.	are detailed in appendices: Desk-Based Research (13.1) Geophysical Surveys (13.2), Geoarchaeological Surveys (13.3), Air Photo and LiDAR Assessment (13.4), Heritage Statement (13.5) and Evaluation Trial Trenching (13.6).
	The ES will require further desk-based research, non-intrusive surveys, and intrusive field evaluation for the full extent of proposed impact areas. The results should be used to minimise the impact on the historic environment through informing the project design and an appropriate programme of archaeological mitigation secured in the Development Control Order (DCO). Regarding desk-based sources, the Environmental Statement will require:	An appropriate mitigation strategy is provided in a detailed Written Scheme of Investigation (Appendix 13.7), which is in line with national guidance and consistent with other solar-based developments of a similar nature



Consultee and Date	Summary of consultation and engagement feedback	Response
	Full LiDAR coverage and assessment; full aerial photo coverage and assessment;	
	archaeological reports; relevant documents from the Record Office covering each site; and	
	the Portable Antiquities Scheme (PAS) data must also be consulted.	
	Map regression should include all available maps to provide a reasonable understanding of	
	the development and time depth of the sites. The HER search should be for at least 5km for visual impact on designated assets."	
Online meeting with Bassetlaw District Council (Historic Environment Officer) and	"They had not been consulted prior to submission of this scoping report and have significant concerns on the Cultural Heritage section (section 12) of the submitted documents. Disappointed that the applicant has not engaged prior to this submission or to undertaking/commissioning geophysical survey work, which may not meet the standards and quality control requirements expected. Concerned that the substation and cable corridor routes have not been determined and therefore not considered. The review and initial assessment of assets presented in this document is based on very limited data and many of the conclusions drawn cannot be justified at this stage without Further desk-based research, non-intrusive and intrusive evaluation. Concluded that the Environmental Impact	Full consultation was undertaken with Bassetlaw District Council between March 2022 and January 2023. This included the submission and approval of WSIs for geophysical survey and trial trench evaluation, which were produced in accordance with national guidance and the Lincolnshire Archaeology Handbook (2019). Numerous site visits were undertaken across all sites within the Scheme during the trial trench evaluation between July and November 2022. Bassetlaw District Council were in approval of the quality of works being undertaken and in agreement of the validity of the results of the non-intrusive survey works (in particular the geophysical survey), which had been used to inform the evaluation trial trenching. A full suite of baseline information was assessed and used to inform a programme of trial trench evaluation. The various baseline assessments are detailed in appendices: Desk-Based Research (13.1) Geophysical Surveys (13.2),
the applicant 1st March 2022	Assessment (EIA) will require desk-based research, non-intrusive surveys, and intrusive field evaluation for the full extent of proposed impact including the cable connection corridor routes and substation. The results should be used to minimise the impact on the historic environment through informing the project design and an appropriate programme of archaeological mitigation. The provision of sufficient baseline information to identify and assess the impact on known and potential heritage assets is required by Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (Regulation 5 (2d)), National Planning Statement Policy EN1 (Section 5.8), and the National Planning Policy Framework."	Research (13.1) Geophysical Surveys (13.2), Geoarchaeological Surveys (13.3), Air Photo a LiDAR Assessment (13.4), Heritage Statement (13.5) and Evaluation Trial Trenching (13.6). An appropriate mitigation strategy is provide a detailed Written Scheme of Investigation (Appendix 13.7), which is in line with national guidance and consistent with other solar-base developments of a similar nature.



Consultee and Date	Summary of consultation and engagement feedback	Response
Online meeting with LCC Historic Place Team Archaeologists representing Lincolnshire and Bassetlaw and the applicant 31st March 2022	Discussion that evaluation trenching would focus on areas assessed to have archaeological potential. Discussion of production of overarching written scheme of investigation (WSI), the trench plans for which would be provided in stages for agreement and appended to WSI. Discussion of overarching geophysical survey WSI methodology for cable route.	Non-intrusive survey (i.e. desk-based research, LiDAR survey data, aerial photographs, geophysical survey etc.) have successfully identified the presence, absence, extent, form and significance of potential concentrations of archaeological features. The archaeological evaluation trenching needed to be sufficient to understand the archaeological potential of features identified through non-intrusive survey techniques, as well as the potential impact of the proposal on their significance.
Online meeting with LCC Historic Place Team Archaeologists representing Lincolnshire and Bassetlaw and the applicant 28th April 2022	Understanding reached that Lincolnshire County Council were happy with methodology of the overarching WSI. Requested additional trenches in areas in which geophysical survey or other available sources had not identify archaeological remains Stated that they were going to undertake a site visit in May to further their knowledge of the sites.	Agreed that the trial trench evaluation would include a sample of 'blank' areas where non-intrusive surveys had identified a low potential for archaeological features to be present. However, blanket trenching across whole of the Scheme was considered to be disproportionate and unreasonable given the high quality of information attained through non-intrusive surveys.
Site Visit with Historic England and the applicant 13th May 2022	Visit to West Burton 1, 2 and 3 to initially assess the Stow Park, Ingleby, Broxholme Scheduled Monuments Historic England (HE) agreed that they would have no objection to the proposals within West Burton 1 and 2. HE appreciated that the design proposals at West Burton 2 had taken into account the setting of the Ingleby SM, by removing areas adjacent to the SM from any proposed development. HE stated that it was minded to object to any development within the historical area of Stow Park, which they viewed had potential to change the setting of 'The medieval bishop's palace and deer park' SM 1019229'	The Ingleby Scheduled Monument has been removed from the Scheme, together with areas adjacent to this that were assessed to have potential for the survival of significant archaeological remains. The results of the discussion with Historic England informed the Scheme design consultation process. An assessment of impacts to designated assets has been undertaken within a Heritage Statement (Appendix 13.5).



Table App 13.9.1.2: Consultation Post PIERs

Consultee and	Summary of consultation and engagement	Response
Date	feedback	
Online meeting with Historic England's Science Advisor and the applicant 25th May 2022	General discussion regarding assessment and evaluation work being undertaken to understand the archaeological potential of the Scheme. The Historic England Science Advisor was happy with the baseline information that was being collated, and in agreement that the results of the geophysical survey had been successful in identifying concentrations of archaeological remains. They were also pleased that paleoarchaeology was being considered for the Scheme. They advised that archaeological works should be considered as part of other ground investigations i.e. archaeological monitoring of boreholes.	Comments from the Historic Science advisor used to inform subsequent fieldwork programmes. A geoarchaeological assessment has been undertaken to inform the ES.
Email discussion with LCC Historic Place Team and the applicant April / June 2022	Series of emails regarding the scope of work required for the evaluation trenching. Original proposal of targeting trenches on potential concentrations of buried archaeological deposits identified from baseline information was rejected by Lincolnshire County Council. Instead Lincolnshire County Council (LCC) Historic Places Team expected what was considered by the applicant to be disproportionate blanket trenching across the whole site (suggested minimum of 3% and 1% contingency as a bottom line for ensuring sufficient coverage).	Blanket trenching across whole of the Scheme considered to be disproportionate and unreasonable given the high quality of information attained through non-intrusive surveys. It was agreed between Lincolnshire County Council and the Applicant on the 17th June 2022 that a 2% sample (+2% contingency as required) was undertaken focused on areas containing concentrations of archaeological deposits and adjacent 'blank' areas. No agreement was made regarding areas that are considered to have a negligible/low potential i.e. where baseline information had not identified any possible buried archaeological deposits.
Meeting with The Planning Inspectorate, LCC Historic Place Team and the Applicant 9th June 2022	Discussion on Trial Trench Requirements. Due to the disagreement regarding evaluation trial trenching sample in 'blank' areas no trenching works were able to commence prior to the meeting with PINS, which caused an unnecessary delay to the commencement of intrusive archaeological works. "The Applicants prefaced the discussion with reference to the British Energy Security Strategy and the pressing need for new energy generation infrastructure. They outlined discussions to date with LCC Historic Place Team regarding a Written Scheme of Investigation (WSI) and trial trenching approach. The Applicants suggested that the approach had evolved from an initial agreement on a targeted, evidence-led approach, focusing on features identified through desk-based assessment and geophysical survey, into a more generic and costly percentage area-based approach. The	There was a continued desire to quickly seek agreement for the scope of evaluation trial trenching for the Scheme. Although, a large-scale programme of untargeted evaluation trenching across 'blank' areas was considered unnecessary and unreasonable. The scope of evaluation trial trenching would be extended to include a sample of 'blank' areas to test the validity of the non-intrusive survey results. A staged approach was considered imperative to allow investigations to be informed by live data and ensure that an efficient programme of works was established. Applicant committed to providing quality baseline information that could be used to inform the extent and location of evaluation trial trenching. Welcome working closely with Lincolnshire County Council Historic Places



Consultee and Date	Summary of consultation and engagement feedback	Response
	good quality to inform the evidence-led approach. The Applicants explained that LCC Historic Place Team did not consider that geophysical survey data would fully identify the extent of archaeology present and therefore LCC Historic Place Team required more trenches to be placed in 'blank' areas rather than identified areas of archaeology from the survey. LCC has requested 3+1% of trenching on site which the Applicants do not consider is proportionate to the potential impact of the development which it suggested was approximately 0.07% of the land area subject to the Cottam and West Burton developments. The Applicants suggested that the level of trenching was more consistent with the requirements for a housing development.	Team to ensure an effective and responsive programme of evaluation trial trenching is achieved. Agreement reached with LCC that trial trenching works should commence in areas identified as containing buried deposits by the geophysical survey and that a staged approach would be undertaken to submitting trench plans.
	It was noted finally, that due to the disagreement regarding the amount of trenching required in blank areas, the Applicant did not have an agreed WSI and could not commence trial trenching in any areas, even where there was agreement regarding the need for such trenching.	
	The Inspectorate questioned whether cable trenches would be focused within the array sites or at the field margins. The Applicant confirmed that it would generally be in field margins and suggested that work with the greatest potential to interfere with archaeological remains was associated with features such as the battery storage element. The Applicant explained that methods of construction such as concrete footings could be used to avoid impacts but highlighted that these were generally not preferred."	
	"LCC Historic Place Team confirmed that it had requested 3+1% trenching, which it considered was required in order to ensure that impacts on unknown buried archaeological remains would be avoided. It particularly highlighted the impact of piling on burials. LCC Historic Place Team suggested that its approach was proportionate to characterise the baseline to inform decision making. It also highlighted the limitations of magnetometry surveys in the Trent Valley area, which it emphasised was very sensitive archaeologically. LCC Historic Place Team stated that the very large sites should not be treated differently from other sites and that their size did not remove the need for comprehensive evaluation.	
	LCC Historic Place Team confirmed that it is broadly content with the draft WSI for trenching in areas of archaeological sensitivity identified by geophysical survey. It stated that here is no need to delay work for these agreed trenching	



Consultee and Date	Summary of consultation and engagement feedback	Response
	locations. The Applicant welcomed this approach. LCC Historic Place Team remained of the view that trenching in blank areas would require further discussion and potentially remain an area of disagreement and a matter for examination.	
	LCC Historic Place Team expressed disappointment that discussions with the Applicant had not commenced until after publication of the Inspectorate's Scoping Opinion. The Applicant responded that the availability of geophysical survey data in March 2022 had dictated the engagement programme.	
	The Inspectorate questioned whether there were any means of focussing the survey approach for trenching activity in blank areas. LCC Historic Place Team suggested that features such as geology and other desk-based/survey data could be used to focus trenching activity but could not fully be relied upon and that staged approaches to trenching were possible, e.g. using soil strip rather than full trial trenching.	
	The Inspectorate also queried whether some works could be undertaken post-consent drawing on examples such as the Cleeve Hill and Triton Knoll projects. LCC Historic Place Team highlighted the need to provide sufficient information on baseline, impacts and mitigation to satisfy the requirements of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, however it acknowledged that some works could be undertaken post-consent. The Applicant's legal representative supported this position.	
	The Inspectorate questioned whether the Applicant had had similar discussions with other host authorities including West Lindsey District, Bassetlaw District and Nottinghamshire County Councils on this matter. LCC Historic Place Team explained that these councils are either represented by LCC Historic Place Team archaeology officers or else defer to LCC. The Applicant stated that there was great variability between local authorities regarding archaeological requirements and it would be helpful to have a consistent National position. The Inspectorate summarised the national policy position on archaeological investigations as set out in the Overarching National Policy Statement (NPS) for Energy (EN-1) and the draft NPS for Renewable Energy Infrastructure (EN-3). It was noted that the NPS do not specify percentage area excavation requirements and emphasise the need for proportionality."	



Consultee and Date	Summary of consultation and engagement feedback	Response
	"Both parties acknowledged that whilst they anticipated that there may be some continued disagreement, their goals are to achieve common ground and move forward. LCC Historic Place Team emphasised that provided the Applicant can provide further detail in relation to the impacts of the Proposed Development, this would enable LCC to work with them to develop a targeted survey approach for blank areas.	
	 LCC Historic Place Team agreed that work could commence on trenching of sensitive locations identified by the geophysical survey; Applicant committed to provide additional information on specific locations of intrusive works required for the Proposed Development; and LCC Historic Place Team and Applicant agreed to consider a staged approach for assessment of blank areas and works that could be delayed post consent." 	
Public engagement events	Series of meeting with the general public to discuss initial finds of baseline assessments within the Scheme.	An assessment on any impacts to the setting of designated assets has been undertaken within a Heritage Statement (Appendix 13.5).
June / July 2021	Discussions largely focused on Conservation Areas and Listed Buildings, as well as local history and archaeology. No major Archaeology or Heritage concerns were raised.	
Site Visit – West Burton 2, Field N1 with LCC Historic Place	Agreed there was a good correlation between results of the non-intrusive surveys (air photo and LiDAR mapping and geophysical survey) and the evaluation trenching.	Comments from Lincolnshire County Council applied, and level of quality maintained for duration of fieldwork programme.
Team and the applicant 11 th July 2022	Blank trenches signed off from further investigation by LCC Historic Place Team and could be backfilled.	
	Request that sondages were dug in every trench to test natural geology.	
	LCC Historic Place Team pleased with quality of work being undertaken.	
Email between LCC Historic Place Team and the applicant 31 th August 2022	Agreed no further site visit needed for West Burton 2, Fields N1 and N2.	All parties pleased with progress and quality of works undertaken and that acquired data would
	All trenches signed off in West Burton 2 from further investigation by LCC Historic Place Team and could be backfilled.	provide an informed and appropriate mitigation strategy. Works concluded at West Burton 2.
Pottery session with local pottery expert, LCC Historic	Pottery session with local specialist and archaeological contractor. Lincolnshire County Council reiterated the request for the pottery expert to be included on site tours and the	The local pottery expert was consulted by the archaeological contractors and invited on site visits from September 2022.



Consultee and Date	Summary of consultation and engagement feedback	Response
Place Team, archaeological contractor and the applicant.	provision of a series of workshops for site staff. It was agreed that the local pottery specialist would be brought on subsequent site tours.	Any outreach programme, for example including possible workshops, would be delivered as part of a mitigation programme for the scheme and so was not considered appropriate during the evaluation phase of works.
2022		All control of
Email between LCC Historic Place Team and the applicant 6th October 2022	Agreed no site visit needed for West Burton 1, Fields M2 and M3. All trenches signed off in West Burton 1 from further investigation by LCC Historic Place Team and could be backfilled.	All parties pleased with progress and quality of works undertaken and that acquired data would provide an informed and appropriate mitigation strategy.
2022		West Burton 1.
Site Visit – West Burton 3, Fields Q1, Q6-Q9, Q15 and Q16 with	Agreed there was a good correlation between results of the non-intrusive surveys and the evaluation trenching. LCC Historic Place Team requested trench	All parties pleased with progress and quality of works undertaken and that acquired data would provide an informed and appropriate mitigation strategy.
LCC Historic Place Team a local pottery	extended in Field Q7, where a possible structure identified.	Applicant agreed to extend trench to investigate potential structure.
expert, and the applicant 16 th September 2022	LCC Historic Place Team suggested that 'open excavation' should be considered as part of the evaluation phase in West Burton 3 where trial trench evaluation had identified the potential for structural remains to be present. The Applicant stated that the preference would be to preserve any remain in situ through mitigation by design i.e. removal from scheme or using ground anchors (concrete feet). LCC Historic Place Team stated the only form of mitigation by design that they considered appropriate would be complete removal from scheme, in which plan a constructional / operation / decommissioning plan was required that prevented any works occurring (including plant movement) in areas containing buried remains.	Mitigation by design using non-intrusive concrete ground anchors is a nationally recognised approach for safeguarding archaeological remains against the impacts caused by the installation of solar panels. No areas are recommended for 'fenced off no-go areas' as this is not considered to be a proportionate approach to mitigation.
Site Visit – West Burton 3, Fields P4, Q1, Q6-Q9, Q15 and Q16 with LCC Historic Place Team a local	Agreed there was a good correlation between results of the non-intrusive surveys and the evaluation trenching. LCC Historic Place Team agreed no further site visits required in Field P4. LCC Historic Place Team requested trench	All parties pleased with progress and quality of works undertaken and that acquired data would provide an informed and appropriate mitigation strategy. Applicant agreed to extend trench inf Field Q7, as well as the further 10 trenches in Fields Q7, O2 O15 and O16.
pottery expert, and the applicant 27 th September 2022	further extended in Field Q7. LCC Historic Place Team requested 10 further trenches across Fields Q7, Q8, Q15 and Q16 to identify the presence of structures as artefactual evidence suggested the presence of nearby Roman buildings.	Q8, Q15 and Q16.



Consultee and Date	Summary of consultation and engagement feedback	Response
Site Visit – West Burton 3, Fields Q6-Q9, Q15 and Q16 with LCC Historic Place Team a local pottery expert, and the applicant 13 th October 2022	Agreed there was a good correlation between results of the non-intrusive surveys and the evaluation trenching. Structure identified in second extension of trench in Field Q7. No structures encountered in the 10 additional trenches. LCC Historic Place Team requested trench extended in Field Q9, where a possible structure identified.	All parties pleased with progress and quality of works undertaken and that acquired data would provide an informed and appropriate mitigation strategy. Applicant agreed to extend trench to investigate potential structure.
Site Visit – West Burton 3, Fields Q6-Q9, Q15 and Q16 with LCC Historic Place Team a local pottery expert, and the applicant 26 th October 2022	Possible structure identified in Field Q9. LCC Historic Place Team requested further examination of identified feature to confirm interpretation. LCC Historic Place Team subsequently agreed no further works required on 26/10/2022 in West Burton 3 and that trenches could be backfilled once features were fully investigated and recorded.	All parties pleased with progress and quality of works undertaken and that acquired data would provide an informed and appropriate mitigation strategy. Works concluded at West Burton 3.
Emails between Historic England Development Advice Team Leader (North and the Applicant 6th January – 11th January 2023	Historic England stated that; "Having considered the updated information you have provided and in particular drawing reference West Burton 3 Illustrative Layout RLBv2.3 24-11-2022, and noting the amendments made, our position remains as set out in the attached previous correspondence. We would be minded to object to installation of any part of the development within the former deer park (as defined by the lines of the scheduled Park Pale and its former course. We are increasingly concerned that your clients appear not to have chosen to engage with our advice in respect of impacts upon the significance of The medieval bishop's palace and deer park, Stow Park - a scheduled monument designated by the Secretary of State on the basis of its national importance. We urge you to address our advice by deleting the panels shown within the medieval deer park, prior to submission of your DCO. I am available to meet directly with your clients on TEAMS if this would assist them in understanding our likely objection as a Statutory Consultee. It would be highly regrettable if on a scheme	It was agreed that parties would meet to provide clarification on positions. Meeting arranged for 20 th January 2023.



Consultee and Date	Summary of consultation and engagement feedback	Response
	where heritage impacts are otherwise largely agreed we were to be placed in the position of having to object to grant of DCO at examination due to this critical matter not being resolved."	
Online meeting with LCC Historic Place Team, AECOM and the applicant 12th January 2023	Meeting to discuss combined cable route mitigation strategy. LCC Historic Place Team confirmed that they were happy with the approach detailed. Further clarity was requested for operational phases of the cable route – in particular if the operational management plan details how maintenance would be undertaken along the cable route, and the likelihood of repair works being required that would result in intrusive works in areas of preservation in-situ	All parties in agreement with shared cable route mitigation.
Online meeting with Historic England Development Advice Team Leader (North) 20th January 2023	Meeting to discuss impacts on setting of 'The medieval bishop's palace and deer park, Stow Park' Scheduled Monument.' HE restated their objection to any solar development within the area considered to form the historic deer park.	The Applicant stated that they would be open to discuss options to mitigate the impact on Stow Park through design-based mitigation, including removal of panels from specific fields around the area of the bishop's palace. An assessment on any impacts to the setting of designated assets has been undertaken within a Heritage Statement (Appendix 13.5).



Section 42 Response Table

Respondent	Comment	Applicant response
Lincs County Council	With respect to the West Burton PEIR report, are pleased by the progress which has been made and by our mutual engagement with finding a reasonable approach to undertaking sufficient archaeological field evaluation, however this position has not been reflected throughout the document. As it stands our response to this PEIR must reflect our concern particularly with the proposed mitigation approach which is ill advised and unworkable.	Archaeological evaluation trenching was undertaken that was considered sufficient to understand the archaeological potential of features identified through non-intrusive survey techniques (i.e. desk-based research, LiDAR survey data, aerial photographs, geophysical survey etc.), as well as the potential impact of the proposal on their significance. As agreed with Lincolnshire Historic Environment Team, this equated to 2% (+2% contingency as required) of areas where possible concentrations of archaeological deposits had been identified. No agreement was made for regarding areas that are considered to have a negligible/low potential i.e. where baseline information had not identified any possible buried archaeological deposits. To test the results of the geophysical survey, several 'blank' areas adjacent to concentration of archaeology were also assessed at a 2% sample.
		Baseline information has successfully established the absence/presence/extent/form/preservation of concentrations of buried archaeological remains within the Scheme, and has been used to identify areas where mitigation will be required (the majority of which were agreed on site with the Lincolnshire County Archaeologists).
		The mitigation strategy is detailed in a detailed Written Scheme of Investigation provided in ES Appendix 13.7, and is in line with national guidance and consistent with other solar-based developments of a similar nature.
Lincs County Council	Regarding the report itself, it would be helpful to have allocated reference numbers throughout the document including the tables to allow for easier reference.	The individual Site, Parcels and Fields that comprise the Scheme have all been given 'unique identifier' (UID) references. UIDs have also been provided for non-designated archaeological remains in Table 13.10 - 13.16 of the Environmental Statement, and for non-designated historic buildings in Tables 13.24 - 13.27 of the Environmental Statement [EN010132/APP/WB6.2.13]. A UID has also been given to each individual area of proposed mitigation - see Section 6 of the Archaeological Mitigation WSI [EN010132/APP/WB6.3.13.7] and Table 13.8-2 in Appendix 13.8 of the ES [EN010132/APP/WB6.3.13.8].
Lincs County Council	In Table 31.1 Consultation Responses, the last Where Consultation Comment is Addressed on page 390 currently says 'Discussion with LCC regarding trial trenching are ongoing'. Have now	A broad range of evaluation techniques were used to collect high-quality baseline information, and have successfully identified the presence/absence/extent/form/significance of



Respondent	Comment	Applicant response
	agreed to a trial trenching percentage of 2% with a 2% contingency, with trench plans for individual parcels currently being discussed and agreed, ongoing. - Our first Lincolnshire County Council (Historic Environment Officer) 25 February 2022 Consultee Response on page 391 states that a full suite of evaluation including competently assessed desk-based information, geophysical survey and a robust programme of trial trenching are required to provide evidence for the site-specific archaeological potential of the development. This has not been completed.	potential concentration of archaeological features. Evaluation trenching for specific areas of the Scheme, where concentrations of archaeological features were identified by non-intrusive survey, was agreed with the Lincolnshire Historic Environment Team, equating to 2% (+2% contingency as required) of individual Fields. No agreement was made on 2% evaluation trenching of the whole Scheme. Evaluation trenching was undertaken to 'ground truth' the results of the non-intrusive surveys, and included 'blank' areas in which non-intrusive surveys had not identified any evidence for archaeological remains. There was shown to be a high correlation between the archaeological remains identified by non-intrusive surveys and those identified through evaluation trenching. Non-intrusive surveys were accurate in identifying both areas where archaeological sites where present, as well as 'blank' areas that were devoid of archaeological deposits. Where features were encountered in 'blank' areas that had not been recorded by non-intrusive surveys, they were primarily found to be of a low archaeological interest (i.e. likely caused by postmedieval agricultural activity). The extensive scope of non-intrusive survey work and the correlation between the results of non-intrusive surveys and the evaluation trenching, are considered sufficient to be able to establish that the archaeological potential for 'blank' areas is negligible/low. Consequently a large-scale programme of untargeted evaluation trenching across 'blank' areas was considered unnecessary and unreasonable, given the evidence produced by non-intrusive surveys which was supported by targeted evaluation trenching.
Lincs County Council	On page 292 in response to the Bassetlaw District Council (Historic Environment Officer) 1 March 2022, Where Consultation Comment is Addressed includes the statement that 'Further information will be provided within and alongside the ES', the results of all evaluation and the completed desk-based assessments will need to inform an appropriate mitigation strategy as part of the ES which will be submitted with the DCO application.	A detailed mitigation strategy (WSI) is included by the Applicant in Appendix 13.7 [EN010132/APP/WB6.3.13.7] to the Environmental Statement Chapter 13 (Cultural Heritage) [EN010132/APP/WB6.2.13].
Lincs County Council	Overall, however our greatest concern for Table 31.1: Consultation Responses is that there are a number of consultation comments for which the Where Consultation Comment is Addressed column simply refers us to Appendices 13.1, 13.2	The results of various assessments are detailed in appendices: Desk-Based Research (13.1) Geophysical Surveys (13.2), Geoarchaeological Surveys (13.3), Air Photo and LiDAR Assessment (13.4), Heritage Statement (13.5), Evaluation Trial Trenching (13.6), Mitigation Strategy (13.7),



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	and 13.4 despite the information not being included in those appendices.	Impact Assessment Tables (13.8) and Cultural Heritage figures (13.9).
Lincs County Council	Section 13.4.2 states that 'In addition, further assessment will be undertaken for those areas within the cable route options that extend beyond the study areas for the DBAsGeophysical surveys are currently being undertaken within these areas, NMP, LiDAR and HER data will also be assessed in order to inform route options.' The full suite of evaluation is required for the full extent of the proposed development area including complete desk-based assessments with the required sources as quoted at the bottom of page 391. A programme of trial trenching along the cable routes is also required to ascertain the presence or absence of archaeology, to provide evidence to inform the route selection and to determine what mitigation will be required along the route.	Full and detailed desk-based assessments have been completed and have been used to inform the ES Chapter (13) and the production of a detailed mitigation strategy (WSI; Appendix 13.7). These include assessment of the full range of cartographic sources, and all available archaeological records, including PAS, HLC, NHRE, NHLE, NMP and HER data, as well as the results of specifically commissioned LiDAR and aerial photographic analysis (ES appendices 13.1 and 13.4). These sources were all used in determining the location of trenches as part of the programme of archaeological evaluation trenching. Non-intrusive surveys have been undertaken along the cable corridor and have successfully identified the presence / absence of archaeological remains. In line with national guidance and other schemes of a similar nature, as well as with consideration to the high impact caused by the cable route, a programme of archaeological monitoring, including a watching brief and 'strip, map and sample' excavation where archaeological deposits are present, is considered appropriate 'additional' mitigation (WSI; Appendix 13.7).
Lincs County Council	Section 13.4.6 - assessments of significance should be undertaken for all designated assets to ensure any assets subject to proposed descoping has an evidence base demonstrating the lack of direct or indirect impact upon the designated asset and its significance before it can be descoped.	The assessment of significance for designated assets has been undertaken in accordance with the guidance enshrined in Historic England's Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets. This guidance recommends a staged approach whereby the assessment of the significance of heritage assets is undertaken following an initial assessment which identifies which heritage assets could be affected. It would not be proportionate to also assess the significance of heritage assets that would not be affected by the Scheme.
Lincs County Council	Section 13.4.7 - the proposed clustering of Grade II listed buildings is acceptable where they are, for example part of the same settlement or estate. Given the proposal in 13.4.8 to reduce the assessment area of listed buildings from 5km to 2km do not agree that individual listed buildings which do not exist in clusters should be assessed in clusters as the potential impact and any proposed mitigation may be specific to that building. Regarding section 13.4.9 the sources of information used to inform this PEIR include The draft DBAs that have been produced for each of	The assessment of Grade II Listed Buildings within the 2km study areas has been undertaken in accordance with this comment (ES Appendix 13.5 [EN010132/APP/WB6.3.13.5]). DBAs have been produced covering the whole Scheme, including the cable routes, comprising assessment of the full range of cartographic sources, and all available archaeological records, including PAS, HLC, NHRE, NHLE, NMP and HER data, as well as the results of specifically commissioned LiDAR and aerial photographic analysis, and geophysical surveys.



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	the West Burton 1-4 Sites.' DBAs will also need to include the cable routes and the substation.	
Lincs County Council	Only the Historic England National Heritage list has been listed separately on the sources for this PEIR therefore all other required information should have been included in the draft DBAs. As seen in 13.6.2 this has not yet been done.	DBAs have been produced covering the whole Scheme, including the cable routes, comprising assessment of the full range of cartographic sources, and all available archaeological records, including PAS, HLC, NHRE, NHLE, NMP and HER data, as well as the results of specifically commissioned LiDAR and aerial photographic analysis, and geophysical surveys.
Lincs County Council	Section 13.6.1 states that 'Further research and evaluation at the West Burton 1, 2, 3 and 4 and substation Sites will provide a greater understanding of the baseline conditions and inform future mitigation strategies in consultation with Historic England and the local authority's archaeological advisors. Agree that all of this information and assessment is required and disappointed that it has not been completed in timely fashion. Full desk-based information is required to inform trenching plans, any plans which are agreed before full DBAs are produced will need reassessment as this information may reveal new evidence. Please be advised this would result in unnecessary duplication of work and have potential knock-on effects for scheduling, budget and the production of an appropriate mitigation strategy which needs the full suite of evaluation results including trenching in order to be reasonable and fit for purpose.	DBAs have been produced covering the whole Scheme, including the cable route, comprising assessment of the full range of cartographic sources, and all available archaeological records, including PAS, HLC, NHRE, NHLE, NMP and HER data, as well as the results of specifically commissioned LiDAR and aerial photographic analysis, and geoarchaeological assessment. The location and position of evaluation trenches were informed by the results of the DBA, together with the geophysical survey results, and trench plans were revised, and areas of trenching added, as updated information became available. Based on the results of geophysical, air photo and LiDAR surveys, and supported by the results of the extensive programmes of targeted archaeological evaluation trenching, it was not considered that trenching was required across areas of the Scheme in which there is no evidence for archaeological activity. Non-intrusive assessment, backed up by the results of archaeological features and 'blank' areas ground-truthed through targeted trenching, is considered sufficient to inform the assessment of impact provided in the ES (Chapter 13) and to allow for the determination of the issuing of a DCO. The results of the geophysical, air photo and LiDAR surveys and assessments, and targeted trenching, combined with the assessment of the differing potential impacts of the Scheme across its area, have been used to formulate a strategy of Post-Decision archaeological mitigation detailed in a WSI (ES Appendix 13.7).
Lincs County Council	Section 13.6.2 states that 'The draft DBAs for the three Sites will be completed, to include evidence from historic map regression, LiDAR analysis and aerial photo mapping. This evidence, alongside the geophysical survey and geoarchaeological assessment results, will inform a scheme of further evaluation including targeted evaluation trenching.'. Fully analysed and assessed DBAs are required for West Burton	Full and detailed desk-based assessments have been completed and have been used to inform the ES Chapter (13) and the production of a detailed mitigation strategy (WSI; Appendix 13.7). These include assessment of the full range of cartographic sources, and all available archaeological records, including PAS, HLC, NHRE, NHLE, NMP and HER data, as well as the results of specifically commissioned LiDAR and



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	1, 2, 3, 4, the substation and the cable routes. There is no reference to the use of Portable Antiquities Scheme (PAS) data which is included in the list of required sources quoted at the bottom of p 391 which should also inform the trenching programme.	aerial photographic analysis (ES Appendices 13.1 and 13.4). These sources were all used in determining the location of trenches as part of the programme of archaeological evaluation trenching. Non-intrusive surveys have been undertaken along the cable corridor and have successfully identified the presence / absence of archaeological remains. In line with national guidance and other schemes of a similar nature, as well as with consideration to the high impact caused by the cable route, a programme of archaeological monitoring, including a watching brief and 'strip, map and sample' excavation where archaeological deposits are present, is considered appropriate mitigation.
Lincs County Council	Section 13.6.5 states that geophysical survey will be undertaken along the cable routes with appropriate desk-based research and bolstered by targeted trenching. Full evaluation including comprehensive desk-based assessment and trenching of the 'blank' areas will be required to obtain baseline evidence across the full impact zone including the cable routes.	Desk-based research (HER, NHLE, NHRE, HLC, PAS and cartographical information), along with non-intrusive surveys (Assessments of LiDAR, aerial photographs and geophysical survey) has been undertaken to create a comprehensive suite of baseline information. Archaeological evaluation trenching has been undertaken within assessable areas of the 'Shared Cable Corridor'. Trial trench evaluation was considered appropriate within the 'Shared Cable Corridor' given the form / extent of archaeological features identified by baseline information and the higher level of impact that will potentially occur due to it being used by up to three or more cable routes belonging to the West Burton and other proposed solar schemes. No evaluation trenching was considered necessary for the remainder of the West Burton Cable Route where a single cable is proposed, and baseline information has suggested a minimal potential for archaeological features to be present as alternative mitigation was considered appropriate to safeguard against any potential loss of archaeological deposits present.
Lincs County Council	Regarding the 'Future Baseline' discussed in sections 13.6.12 to 13.6.14, decommissioning must be considered and do not agree that the impact will be minimal.	The Applicant has presented assessment of potential impacts to heritage assets during decommissioning in section 13.7 of the Environmental Statement Chapter 13 (Cultural Heritage) [EN010132/APP/WB6.2.13], and mitigation proposals are presented in section 13.8.
Lincs County Council	Section 13.7.1 and the proposals for dealing with 'on-site archaeological remains' by 'mitigation by design'. If what is meant by this in archaeological terms is 'preservation in situ' then it is not a case of simply not putting anchoring spikes or using concrete feet instead in these 'mitigation by design' areas. The full extent of the	Mitigation by design using non-intrusive concrete ground anchors is a nationally recognised approach for safeguarding archaeological remains against the impacts caused by the installation of solar panels. Areas of high impact (i.e. the cable route) have been recommended for additional archaeological



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	archaeological areas must be determined and each area must be fenced off and subject to a programme of monitoring throughout the construction and the decommissioning phases, and there will be no ground disturbance whatsoever which may disturb or affect the archaeological remains, including plant movement or storage. The proposal for the installation of concrete feet requires a full understanding of the depth, extent, importance and nature of the surviving archaeology across the site. Any proposal in archaeologically sensitive areas will require a firm evidence base proving that any proposed work including decommissioning will have no impact upon the archaeology including not only direct destructive impact through groundworks, compaction or reduction in the depth of soil necessary for protecting the archaeology but also through environmental changes which would be detrimental to the surviving archaeology.	mitigaiton ' by record' either in the form of an archaeological watching brief or archaeological 'strip, map and sample'. It should also be noted that agricultural activity is causing a high level of destruction to buried archaeological features, as witnessed during the trial trench evaluation. Removing these sites from agricultural use, provides an opportunity to conserve archaeological remains in situ and prevent further damage being caused by current land use.
Lincs County Council	A mitigation entirely "by design" may result in a significant number and amount of fenced off nogo areas within the redline boundary and cable routes. This would lead to significant ongoing constraints in the construction and decommissioning phases which would affect not only the number of solar panels but the development works themselves including plant activity, the placement of associated infrastructure such as compounds and access routes and in the construction management plan itself.	Mitigation by design using non-intrusive concrete ground anchors is a nationally recognised approach for safeguarding archaeological remains against the impacts caused by the installation of solar panels. Where a high level of impact is likely to occur mitigation by record (i.e. archaeological monitoring) will be undertaken i.e. cable routes, substations and compound areas. No areas are recommended for 'fenced off no-go areas' as this is not considered to be a proportionate approach to mitigation.
Lincs County Council	There are no references to the other standard archaeological mitigation response known as 'preservation by record' through archaeological investigation and recording (archaeological fieldwork) through a range of techniques from set piece excavation and archaeological strip map and record to archaeological monitoring.	A detailed mitigation strategy (WSI) is included by the Applicant in Appendix 13.7 [EN010132/APP/WB6.3.13.7] to the Environmental Statement Chapter 13 (Cultural Heritage) [EN010132/APP/WB6.2.13]. The WSI outlines the various mitigation options required to safeguard archaeological assets within the Scheme. The WSI details areas where 'preservation by record' will be required either in the form of 'strip, map and sample' or an archaeological watching brief.
Lincs County Council	Given the large scale of this development, a suitable mitigation programme which includes archaeological mitigation by archaeological fieldwork would be expected and expect this to be acknowledged and included in this document, certainly it must be included in the Environmental Statement as it is essential as part of an effective, robust and reasonable mitigation strategy to deal with developmental impacts on archaeology.	A detailed mitigation strategy (WSI) is included in Appendix 13.7 [EN010132/APP/WB6.3.13.7] to the Environmental Statement Chapter 13 (Cultural Heritage) [EN010132/APP/WB6.2.13].



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Lincs County Council	This document states that the full extent of the archaeological potential has not yet been established, the trenching programme is not complete and even the desk-based assessments have yet to be finished. Table 13.28 therefore with its proposed mitigation of either 'Targeted evaluation trenching and mitigation by design should this be warranted' or 'None' is entirely inappropriate and should be removed.	The Applicant notes that DBAs have been produced covering the whole Scheme, including the cable routes, comprising assessment of the full range of cartographic sources, and all available archaeological records, including PAS, HLC, NHRE, NHLE, NMP and HER data, as well as the results of specifically commissioned LiDAR and aerial photographic analysis and geophysical survey. A programme of evaluation trenching has been completed and confirmed the archaeological potential of features identified by non-intrusive surveys. The results of the evaluation assessments have been used to compile a detailed mitigation strategy (WSI), presented as Appendix 13.7 [EN010132/APP/WB6.3.13.7] to the Environmental Statement Chapter 13 (Cultural Heritage) [EN010132/APP/WB6.2.13]. The WSI outlines where 'preservation by record' and 'preservation by design' are appropriate to safeguard archaeological assets within the Scheme. In low impact areas where baseline information, supported by the results of the evaluation trenching, has suggested a negligible/low potential for archaeological remains to be present, no further works are considered necessary/appropriate.
Lincs County Council	The appropriate mitigation response cannot be determined without the results of the trenching.	A programme of evaluation trenching has been undertaken by the Applicant, with the assessment reports provided in Appendix 13.6 [EN010132/APP/WB6.3.13.6] to the Environmental Statement Chapter 13 (Cultural Heritage) [EN010132/APP/WB6.2.13]. The results of this assessment have been used to inform a detailed mitigation strategy (WSI; Appendix 13.7 [EN010132/APP/WB6.3.13.7]).
Lincs County Council	The list is not complete as the specific sites come from an early phase of the evaluation programme.	A full suite of archaeological assessment, survey and evaluation trenching has been undertaken by the Applicant. The results of which have been detailed in Chapter 13 (Cultural Heritage) of the Environmental Statement [EN010132/APP/WB6.2.13]. Any former lists of sites have been updated with new information acquired from the various evaluation assessments.
Lincs County Council	The two proposed mitigations are entirely insufficient (see above) archaeological fieldwork will also be required in the suite of mitigation.	A detailed mitigation strategy (WSI) is included by the Applicant in Appendix 13.7 [EN010132/APP/WB6.3.13.7] to the Environmental Statement Chapter 13 (Cultural Heritage) [EN010132/APP/WB6.2.13], that outlines where 'preservation by record' or 'preservation by design' is required to safeguard archaeological assets within the Scheme. The WSI has been informed by an extensive programme of desk-based research and field evaluations (including LiDAR survey data, aerial photographs, geophysical survey, and evaluation



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		trenching), which have successfully established the form and extent of concentrations of buried archaeological remains within the Scheme, and have been used to identify areas where it is considered mitigation will be required (the majority of which were agreed on site with the Lincolnshire County Archaeologists).
Lincs County Council	The phrase 'should it be warranted' is a dismissive tone for dealing with the archaeological impact with a proportionate and appropriate level of response; and	A full suite of archaeological assessment, survey and evaluation trenching has been undertaken by the Applicant and used to inform a WSI, presented as Appendix 13.7 [EN010132/APP/WB6.3.13.7] to the Environmental Statement Chapter 13 (Cultural Heritage) [EN010132/APP/WB6.2.13]. The WSI identifies where archaeological mitigation is warranted and the form of mitigation that is appropriate to safeguard the loss of archaeological remains.
Lincs County Council	Given the size of the proposed development there will undoubtedly be much more archaeology across the sites which will require mitigation than is included in the table. The geophysics report alone has identified many more sites of interest, the trenching programme which has only just begun has started to reveal more, including burials.	The archaeological evaluation targeted concentrations of features identified through non-intrusive surveys, as well as 'bank' areas, where baseline information suggested a negligible/low potential for archaeological features to be present. The results of which demonstrated the validity of non-intrusive surveys for identifying the absence / presence / extent of concentrations of archaeological features.
		Where features were encountered in 'blank' areas that had not been recorded by non-intrusive surveys, they were primarily found to be of a low archaeological interest (i.e. likely caused by post-medieval agricultural activity). No additional sites considered to have a local/regional archaeological interest were identified exclusively from the trial trench evaluation.
Lincs County Council	This table suggests that there will be absolutely no archaeological mitigation by fieldwork and indeed that there will be no further archaeological work after the trenching is complete. This is a fundamentally flawed approach which does not allow for a reasonable, proportionate or appropriate level of archaeological mitigation as discussed above.	A detailed mitigation strategy (WSI) is included by the Applicant in Appendix 13.7 [EN010132/APP/WB6.3.13.7] to the Environmental Statement Chapter 13 (Cultural Heritage) [EN010132/APP/WB6.2.13]. The WSI outlines where 'preservation by record' or 'preservation by design' is required to safeguard archaeological assets within the Scheme. The WSI details areas where 'preservation by record' will be required either in the form of 'strip, map and sample' or an archaeological watching brief.
Lincs County Council	Table 13.28 also lists surviving earthworks with completely inappropriate and irresponsible archaeological mitigation, for example the 'Deserted Medieval Village (DMV) Earthworks' under WB2 on page 432. Despite listing the Potential Impact as 'Possible direct impacts to buried archaeological remains from piles to	Pasture fields containing earthwork remains associated with North and South Ingleby Deserted Medieval Villages (West Burton 2) have been removed from the scheme. Most of the ridge and furrow earthworks identified within the Scheme have now been



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	secure for solar panels, cables and other Site infrastructure' the Proposed Mitigation is Targeted evaluation trenching and mitigation by design should this be warranted.' This is completely unacceptable. As with all earthworks which will be impacted by this development, full archaeological topographical survey and recording will be required in advance of any groundworks whatsoever and they will need to be reinstated if they are damaged or destroyed in whole or in part during associated groundworks. Thought will also need to be given for the decommissioning methodology to ensure the earthworks are protected.	levelled, including many that have been previously identified from air photographs (Appendix 13.4, para. 3.6.6). The LiDAR data indicates that those that do survive as earthworks are very low and denuded, and, as such, would be difficult to identify an accurately survey in the field, and would be more accurately represented by the LiDAR data. Provision is made in section 13.7 of the ES chapter for future surveys during decommissioning to identify whether it would be feasible to reinstate any earthworks that might be visible.
Lincs County Council	As detailed above, of significant concern is the very limited approach presented for archaeological mitigation of this scheme as expressed in this PEIR which entirely excludes archaeological fieldwork mitigation. The choice of either preservation in situ or no mitigation at all is wholly inadequate and comprehensively excludes the fundamental core of mitigation techniques including the full suite of archaeological mitigation fieldwork which includes set piece excavation, strip map and record and monitoring as well as earthwork recording. In development terms such an approach would exponentially increase the constraints across the development and have an extensive and lasting impact on the construction and decommissioning phases. In archaeological terms the choice of either preservation in situ or nothing as the only choice for the range and extent of archaeology which has and will come up across such a large development is fundamentally erroneous and unworkable.	A detailed mitigation strategy (WSI) is included by the Applicant in Appendix 13.7 [EN010132/APP/WB6.3.13.7] to the Environmental Statement Chapter 13 (Cultural Heritage) [EN010132/APP/WB6.2.13]. The WSI outlines the various mitigation options required to safeguard archaeological assets within the Scheme i.e. 'preservation by record' or 'preservation by design'. The WSI details areas where 'preservation by record' will be required either in the form of 'strip, map and sample' or an archaeological watching brief. Where there is no evidence to suggest the presence of archaeological features, there is not considered a requirement for archaeological mitigation.
Bassetlaw District Council	The West Burton Solar Project includes proposals for 4 separate sites, 3 of which are in Lincolnshire (West Burton 1, 2 and 3) and 1 is in Bassetlaw (West Burton 4, located between Clayworth and Gringley on the Hill). During the phase 1 consultation, Conservation raised concerns with the West Burton 4 site, and specifically its impact on the setting of a range of heritage assets in Clayworth and Gringley on the Hill.	The Applicant acknowledges that West Burton 4 site in Bassetlaw and the associated cabling infrastructure has been removed from the Scheme in its entirety.
	Phase 2 - Following the Phase 1 comments, I attended a consultation event with Lanpro to discuss how those concerns could be mitigated. The result of that discussion, and of consultations with other agencies, is that the West Burton 4 site has been significantly reduced, around its northern, western and southern boundaries. This has effectively seen a strip of fields around much of the perimeter removed from the scheme. It is evident from both site visits and the new photographic	The Applicant acknowledges that West Burton 4 site in Bassetlaw and the associated cabling infrastructure has been removed from the Scheme in its entirety.



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	viewpoints survey that the majority of the proposed panels would not now be visible in a heritage context. The most notable part of Phase 1 was that a range of panels would be visible from the road between Clayworth and Gringley on the Hill, affecting the open countryside setting to both settlements. This is now no longer the case. Enhanced landscaping would also be provided in key locations around the perimeter.	
Bassetlaw District Council	The only above-ground heritage concern that remains is that some of the panels would be visible from the Chesterfield Canal tow path, to the south of Clayworth (see image VP72, page 674 of the PEIR Volume 2 Appendices). Whilst of concern, that has to be balanced against the public benefits of the proposal, which weigh heavily in favour of the scheme. In addition, those views would be some way in the distance and are only found from this isolated location within the Conservation Area.	The Applicant acknowledges that West Burton 4 site in Bassetlaw and the associated cabling infrastructure has been removed from the Scheme in its entirety.
Bassetlaw District Council	It is evident that some panels would be visible from public vantage points, notably along the footpaths through the site. However, these impacts are considered to be of a general landscape nature, and would not affect the setting of any of the nearby heritage assets.	The Applicant acknowledges that West Burton 4 site in Bassetlaw and the associated cabling infrastructure has been removed from the Scheme in its entirety.
Bassetlaw District Council	The proposal also provides more details of a battery facility adjacent to West Burton Power Station. Conservation has no concerns with that part of the scheme, as no above-ground heritage assets would be affected.'	The Applicant acknowledges that battery facility site adjacent to the West Burton Power Station has been removed from the Scheme in its entirety.
Bassetlaw District Council	Whilst is it acknowledged that a minor degree of harm will be caused as a result of the proposal, it is considered that this is outweighed by the considerable public benefits as a result of the proposal. This is when considered against the requirements of Policy DM8 of the Bassetlaw Core Strategy, Section 16 of the NPPF (specifically paragraph 202) and Section 66(1) of the Planning (Listed Buildings & Conservation Areas) Act 1990.	Noted.
Bassetlaw District Council	The West Burton PEIR addresses Cultural Heritage in Chapter 13. The project is split into four main sites, a substation site and cable connection routes. The bulk of the project is located within Lincolnshire, however the West Burton 4 site, the substation and the cable connection will run through Bassetlaw District connecting to the hub at the site of the former power station at West Burton. Consequently, this response concerns the proposals for the elements located within Bassetlaw and excludes sites at West Burton 1, 2 and 3.	The Applicant acknowledges that West Burton 4 and the associated cabling infrastructure, and the battery facility site adjacent to the West Burton Power Station have been removed from the Scheme in its entirety.



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Bassetlaw District Council	In terms of progress with gathering baseline data on Cultural Heritage, the PEIR does not accurately reflect the current situation on the ground. Sufficient progress is being made with regard to on-going desk-based research and the geophysical survey has been completed at West Burton 4 and is underway along the cable route. Data from evaluation trenching will also be required to support the Environmental Statement (ES) at the West Burton 4 site, the substation and along the entire cable corridor route and this has yet to be agreed. As it stands, my response to this PEIR reflects what has been presented within the document and also my concern particularly with the proposed mitigation approach which is fundamentally flawed.	A programme of geophysical survey (Appendix 13.2) was undertaken on the cable route in Bassetlaw, which as agreed with Lincolnshire Historic Environment Team. The geophysical survey covered a 100% sample of accessible land within the scheme. A trial trench evaluation (Appendix 13.6) was undertaken within the 'Shared Cable Corridor', and sampled 1 - 1.1% of accessible areas. The results of these field evaluations, along with desk based research (including LiDAR survey data, aerial photographs), has been used to inform a detailed mitigation strategy (WSI; Appendix 13.7).
Bassetlaw District Council	The PEIR notes that the initial response to the scoping opinion has been supported by the Planning Inspectorate and that trial trenching and geophysics survey should be used to inform the potential for direct impacts on heritage assets and that the 'The extent of trial trenching activity should be agreed as part of a Written Scheme of Investigation'. This is currently being reviewed for the main West Burton 4 site and has yet to be agreed for the cable route and substation.	The Applicant acknowledges that West Burton 4 and the associated cabling infrastructure, and the battery facility site adjacent to the West Burton Power Station have been removed from the Scheme in its entirety. Desk-based research (including LiDAR survey data, aerial photographs, Appendix 13.1) has identified areas where there is a potential for archaeological remains to occur within the West Burton cable route corridor running between the River Trent and the West Burton Power Station. A programme of geophysical survey (Appendix 13.2) was undertaken along the cable route corridor to further understand the absence / presence / extent / form of buried archaeological remains. Baseline information has been used to inform the final cable route, including micrositing away from areas considered to have a high potential for substantial archaeological remains to be present.
Bassetlaw District Council	The Planning Inspectorate also considers that the above methods should be used to inform the design evolution of the route corridors. The applicant's response is that geophysical survey of the route corridors is underway and the results should be used to help inform the final routes. We await the finalisation of the geophysical survey report.	Desk-based research (including LiDAR survey data, aerial photographs, Appendix 13.1) has identified areas where there is a potential for archaeological remains to occur within the cable route corridor. A programme of geophysical survey (Appendix 13.2) was undertaken along the cable route corridor to further understand the absence / presence / extent / form of buried archaeological remains. Baseline information has been used to inform the final cable route, including micrositing away from areas considered to have a high potential for substantial archaeological remains to be present.
Bassetlaw District Council	The cable route corridor geophysics results will also need to form a significant element of the baseline data for the ES Chapter and inform the overall mitigation strategy.	The ES Cultural Heritage Chapter (13) and mitigation strategy (WSI; Appendix 13.7), including for the cable route corridor, are informed by a full suite of archaeological assessments including desk-based research,



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		aerial photographs, LiDAR data, geophysical survey, and evaluation trenching.
Bassetlaw District Council	In response to our comments ion the Scoping Report (March 2022) in the 'Comment Addressed' column (Table 13.1; p392), the applicant states 'Further information will be provided within and alongside the ES'. In this case, the results of all evaluation including geophysics and trial trenching of all areas of impact including the full length of the cable route corridor should be presented in the ES.	Archaeological evaluation trenching has been undertaken within assessable areas of the 'Shared Cable Corridor'. Evaluation trenching was considered appropriate within the 'Shared Cable Corridor' given the form / extent of archaeological features identified by baseline information and the possible higher level of impact that will potentially occur due to it being used by up to three or more cable routes belonging to the West Burton and other proposed solar schemes.
		No evaluation trenching was considered necessary for the remainder of the West Burton Cable Route where a single cable is proposed, and where baseline information has suggested a minimal potential for archaeological features to be present as alternative mitigation was considered appropriate to safeguard against any potential loss of archaeological deposits present.
		Information collated by desk-based research and non-intrusive survey work, the validity of which has been proven by the results of the evaluation trenching, is considered sufficient to be able to establish that the archaeological potential for 'blank' areas is negligible/low. Consequently a comprehensive programme across all 'blank' areas is not considered necessary.
Bassetlaw District Council	Of significant concern is the reference to Appendices 13.1, 13.2 and 13.4 where these do not adequately address the comments raised for the Scoping Report. While I appreciate the gathering of baseline data is an ongoing process, a certain level of attainment is expected at each stage to inform the next. The data from the Desk-Based Assessment, LiDAR & AP Assessment and Geophysical Survey should be largely completed and combined prior to the trenched evaluation so trenches can be targeted where necessary.	A full suite of archaeological assessment, survey and evaluation trenching has been undertaken as part of the Scheme. These assessments have been undertaken using a staged approach so that each phase of assessment works could inform the next (i.e. the location of evaluation trenches was based on information acquired through desk-based research and non-intrusive surveys). To maximise the knowledge and understanding attained through the various assessments and field evaluations, initial interpretation of baseline information has been re-examined using the results of subsequent works (i.e. the desk-based assessments were updated with the results of subsequent surveys). Data collected from desk-based research, non-intrusive surveys and the trial trench evaluation has been fully detailed and assessed in Chapter 13 of the ES.
Bassetlaw District Council	Section 13.4.2 states that geophysical survey will be undertaken on the currently proposed cable routes and that HER information will be obtained for them. The full suite of evaluation is required	Desk-based research (HER, NHLE, NHRE, HLC, PAS and cartographical information), along with non-intrusive surveys (assessments of LiDAR, aerial photographs and geophysical survey) has been undertaken to create a comprehensive suite of baseline information.



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	for the full extent of the proposed development area including evaluation trenching.	Archaeological evaluation trenching has been undertaken within assessable areas of the 'Shared Cable Corridor'. Evaluation trenching was considered appropriate within the 'Shared Cable Corridor' given the form / extent of archaeological features identified by baseline information and the higher level of impact that will potentially occur due to it being used by up to three or more cable routes belonging to the West Burton, and other, proposed solar schemes.
		No evaluation trenching was considered necessary for the majority of the West Burton Cable Route in Lincolnshire where a single cable is proposed, and baseline information has suggested a minimal potential for archaeological features to be present as alternative mitigation was considered appropriate to safeguard against any potential loss of archaeological remains which could be present.
Bassetlaw District Council	Section 13.4.9 the sources of information used to inform this PEIR include <i>'The draft DBAs that have been produced for each of the West Burton 1-4 Sites.'</i> DBAs will also need to include the cable routes and the substation.	DBAs have been produced covering the whole Scheme, including the cable routes, comprising assessment of the full range of cartographic sources, and all available archaeological records, including PAS, HLC, NHRE, NHLE, NMP and HER data, as well as the results of specifically commissioned LiDAR and aerial photographic analysis.
Bassetlaw District Council	Sections 13.6.1 and 13.6.2 As above, the desk-based elements should be broadly completed as soon as possible to inform the next stage of field evaluation. This is especially pressing in the route corridor and substation areas. For the DBA, additional sources (not currently listed) such as the Portable Antiquities Scheme (PAS) data should be included.	Full and detailed desk-based assessments have been completed and have been used to inform the ES Chapter (13) and the production of a detailed mitigation strategy (WSI; Appendix 13.7). These include assessment of the full range of cartographic sources, and all available archaeological records, including PAS, HLC, NHRE, NHLE, NMP and HER data, as well as the results of specifically commissioned LiDAR and aerial photographic analysis and geophysical surveys (ES Appendices 13.1 and 13.4). These sources were all used in determining the location of trenches as part of the programme of archaeological evaluation trenching. Geophysical, air photo and LiDAR surveys and assessments have been undertaken along the cable corridor and have successfully identified the presence / absence of archaeological remains. In line with national guidance and other schemes of a similar nature, as well as with consideration to the high impact caused by the cable route, a programme of archaeological monitoring, including a watching brief and 'strip, map and sample' excavation where archaeological deposits are present, is considered appropriate mitigation.



Respondent	Comment	Applicant response
Bassetlaw District Council	Section 13.6.5 states that 'geophysical survey will be undertaken along the cable routes with appropriate desk-based research and bolstered by targeted trenching. As above, full evaluation including comprehensive desk-based assessment and trenching of the 'blank' areas will be required to obtain baseline evidence across the full impact zone including the cable routes.	Desk-based research (Appendix 13.1), air photo and LiDAR mapping (Appendix 13.4) and geophysical survey (Appendix 13.2) were undertaken on the cable route in Bassetlaw. The Geophysical survey was undertaken as agreed with Lincolnshire Historic Environment Team, and covered a 100% sample of accessible land within the scheme. A trial trench evaluation (Appendix 13.6) was undertaken within the 'Shared Cable Corridor', and sampled 1 - 1.1% of accessible areas. No evaluation trenching was considered necessary for the remainder of the West Burton Cable Route where a single cable is proposed, and where baseline information has suggested a minimal potential for archaeological features to be present as alternative mitigation was considered appropriate to safeguard against any potential loss of archaeological deposits present. Information collated by desk-based research and non-intrusive survey work, the validity of which has been proven by the results of the evaluation trenching, is considered sufficient to be able to establish that the archaeological potential for 'blank' areas is negligible/low. Consequently a comprehensive programme across all 'blank' areas is not considered necessary.
Bassetlaw District Council	Regarding the 'Future Baseline' discussed in sections 13.6.12 to 13.6.14, decommissioning must be considered, and we do not agree that the impact will be minimal.	Potential impacts to heritage assets during decommissioning is discussed in section 13.7 of the ES, and mitigation proposals are discussed in section 13.8 of the ES.
Bassetlaw District Council	Regarding section 13.7.1 and the proposals for dealing with 'on-site archaeological remains' by 'mitigation by design'. This implies significant levels of 'preservation in situ' which is not possible in regard to the cable routes. It is further unlikely to provide a workable solution for much of the West Burton 4 and substation sites. Further details are required to clarify 'mitigation by design', however in anticipation of the response the following should be considered:	The Applicant acknowledges that West Burton 4 and the associated cabling infrastructure, and the battery facility site adjacent to the West Burton Power Station have been removed from the Scheme in its entirety. A detailed mitigation strategy (WSI) is included in Appendix 13.7 that outlines where 'preservation by record' or 'preservation by design' is required to safeguard archaeological assets within the Scheme. The WSI details areas where 'preservation by record' will be required (i.e. in high impact areas such as the cable route), and the form that it should take based on the potential for archaeological remains to be present (i.e. 'strip, map and sample' or an archaeological watching brief).
Bassetlaw District Council	Archaeological mitigation within the corridor routes is likely to require archaeological excavation and there is no reference in the document to the other standard archaeological mitigation response known as 'preservation by	A detailed mitigation strategy (WSI) is included in Appendix 13.7 that outlines where 'preservation by record' or 'preservation by design' is required to safeguard archaeological assets within the Scheme. The WSI details areas where 'preservation by record' will be required (i.e. in



Respondent	Comment	Applicant response
	record' through archaeological investigation and recording (archaeological fieldwork).	high impact areas such as the cable route), and the form that it should take based on the potential for archaeological remains to be present (i.e. 'strip, map and sample' or an archaeological watching brief).
Bassetlaw District Council	Given the large scale of this development, a suitable mitigation programme which includes archaeological mitigation by archaeological fieldwork would be expected and I would expect this to be acknowledged and included in this document, certainly it must be included in the ES as it is essential as part of an effective, robust and reasonable mitigation strategy to deal with developmental impacts on archaeology.	A detailed mitigation strategy (WSI) is included in Appendix 13.7 .
Bassetlaw District Council	This document states that the full extent of the archaeological potential has not yet been established, the trenching programme is not complete, and the desk-based assessments have yet to be finished. Table 13.28 therefore with its proposed mitigation of either 'Targeted evaluation trenching and mitigation by design should this be warranted' or 'None' is entirely inappropriate and should be removed or revised significantly to reflect the full suite of mitigation techniques available. Currently:	DBAs have been produced covering the whole Scheme, including the cable routes, comprising assessment of the full range of cartographic sources, and all available archaeological records, including PAS, HLC, NHRE, NHLE, NMP and HER data, as well as the results of specifically commissioned LiDAR and aerial photographic analysis and geophysical survey. A programme of evaluation trenching has been completed and confirmed the archaeological potential of features identified by non-intrusive surveys. The results of the evaluation assessments have been used to compile a detailed mitigation strategy (WSI, Appendix 13.7) that outlines where 'preservation by record' and 'preservation in design' are appropriate to safeguard archaeological assets within the Scheme. In low impact areas where baseline information, supported by the results of the trial trench evaluation, has suggested a negligible/low potential for archaeological remains to be present, no further works are considered necessary/appropriate.
Bassetlaw District Council	The approach to surviving earthworks in Table 13.28 is also inappropriate and cannot be agreed. Any earthworks impacted by this development will require full archaeological topographical survey and recording in advance of any groundworks whatsoever and they will need to be reinstated if they are damaged or destroyed in whole or in part during associated groundworks. Thought will also need to be given for the decommissioning methodology to ensure the earthworks are protected.	Provision is made in section 13.7 of the ES chapter for future surveys during decommissioning to identify whether it would be feasible to reinstate any earthworks that might be visible.
Bassetlaw District Council	As detailed above, the very limited approach presented for archaeological mitigation of this scheme as expressed in this PEIR is flawed and cannot be agreed at this time.	A detailed mitigation strategy (WSI) is included in Appendix 13.7 that outlines where 'preservation by record' or 'preservation by design' is required to safeguard archaeological assets within the Scheme. The WSI details areas where 'preservation by record' will be required either in the form of 'strip, map and sample' or an archaeological watching brief.



Respondent	Comment	Applicant response
Historic Railways Estate	I can confirm that HRE do not have any structures in the vicinity of your proposed plans. However, there are some disused railway structures around West Burton 3 (Brampton) which were sold to Railway Paths Ltd. Please contact Railway Paths for further information.	noted.
West Lindsey District Council	13.4.1 – The ES will need to set out how non-designated heritage assets have been identified i.e. through the Historic Environment Register and 'local listing'. Whilst 1km is likely to be reasonable in most cases – "setting" is "the surroundings in which a heritage asset is experienced. The extent to which the development may affect the setting of the asset will depend upon the asset itself.	Full details of the sources of information used for the identification of non-designated heritage assets is set out in section 13.4 of the ES chapter. This includes information identified from the Lincolnshire Historic Environment Record, but the Lincolnshire Local List has yet to be populated. Settings of designated heritage assets of the 'highest significance' (e.g. Grade I and II* Listed Buildings and Registered Parks and Gardens and Scheduled Monuments) within a 5km study area have been assessed, and the settings of Grade II Listed Buildings within 2km study areas surrounding the sites have been assessed (ES Appendix 13.5)
West Lindsey District Council	13.4.6 – we are encouraged to note that the study area has been extended to up to 5km for designated assets 'of the highest significance'. This will then be subject to a 'sifting' exercise. The Local Planning authority wishes to be kept informed of this exercise and be given the opportunity to comment.	The results of this 'sifting' exercise are discussed in the Heritage Statement, presented as Appendix 13.5 to Chapter 13 (Cultural Heritage) of the Environmental Statement [EN010132/APP/WB6.2.13].
West Lindsey District Council	13.4.8 – it is noted that there are 300 GII listed buildings within the 5km zone and that "proposed that the assessment of Listed Buildings within 2km of the West Burton Sites previously included in the Scoping Report is built upon as part of the further assessment, bolstered by 'ground-truthing' visits where feasible. The resultant evidence base will be agreed with the local authority, if possible, prior to the 'scoping out' of assets where appropriate." We will wish to be kept informed and consulted upon any intentions to "scope out" designated heritage assets, after these assessments have taken place.	The evidence base justifying the 'scoping out' of designated heritage assets from further assessment is provided by the Applicant in section 3.1 of the Heritage Statement, presented as Appendix 13.5 to Chapter 13 (Cultural Heritage) of the Environmental Statement [EN010132/APP/WB6.2.13].
West Lindsey District Council	Table 13.6 – As a designated heritage asset – Grade II Listed Buildings should also be valued as "high". This is consistent with paragraph 5.8.14 of EN-1 which states that "Loss [of significance] affecting any designated heritage asset should require clear and convincing justification."	Valuing Grade II Listed Buildings as 'High' would not be in accordance with the assessment methodology adopted for the ES (ES Chapter 13, Table 13.6). Valuing them as 'Medium' would still be consistent with paragraph 5.8.14 of EN-1 which states that "Loss [of significance] affecting any designated heritage asset should require clear and convincing justification."
West Lindsey District Council	13.5.30 – The baseline for non-designated heritage assets should also consider Neighbourhood Plans and Conservation Area Appraisals.	No Conservation Areas were identified within a 2km buffer of the study site within Bassetlaw. Two Neighbourhood Plans (North Leverton and Sturton le Steeple) where identified that are currently in draft. In absence of these plans the study site falls within the Sturton Ward



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		Neighbourhood Plan, which reproduces information held on the Nottingham HER.
West Lindsey District Council	13.7.1 It is acknowledged that baseline and further baseline data is to be completed, and that a "full impact assessment" has yet to be undertaken and will be included in the ES once all of the results have further evaluation have been completed. West Lindsey DC will wish to be consulted and kept informed, ahead of its inclusion within the ES.	Unfortunately, it was not feasible to provide West Lindsey District Council with all of the disparate strands of baseline information which have been collated into the ES prior to their incorporation into the overarching document. There will be an opportunity to review this information and comment upon the impact assessment during the DCO examination period.
West Lindsey District Council	13.8.1 – it is noted that cumulative impacts will be considered, particularly in regards to views from the Lincoln Edge escarpment.	Cumulative impacts are discussed in ES Chapter 13, section 13.10.
Historic England	We welcome the scope of the Historic Environment assessment set out in the PEIR and the ongoing assessment work currently underway. In particular we note the necessity of geophysical survey and targeted trial trenching to inform a proportionate approach to the significance of below ground heritage assets and their individual sensitivity and importance. We refer you to the advice of Local Government archaeological advisors with regards to the methodologies for and assessment of trial trenching results (we are supporting out Local Government colleagues with the expertise of our Regional Science Advisor). Panel arrays and associated structures, cable runs and substations have the potential for significant environmental effects through physical impacts upon buried remains. These impacts will vary depending upon the particular character and sensitivity of such remains (for instance field systems are generally less sensitive to localised intrusions than burial grounds or Roman villas). Appropriate consideration of impacts and proportionate design adaptation and mitigation is only possible where significance and importance are well understood prior to determination (up to and including public benefit balances in respect of harm to assets of demonstrable equivalent importance to scheduled monuments).	A full suite of archaeological assessment has been undertaken to understand the archaeological potential of the proposed development site (desk-based research, air photo and LiDAR assessment, geophysical survey, geoarchaeological surveys and evaluation trenching). The results of these assessments have successfully identified the absence / presence / extent / form / preservation of buried archaeological features and have informed an proportionate mitigation strategy, which takes into consideration the archaeological interest of buried deposits that were identified during the various investigations (WSI, Chapter 13.7).
Historic England	Deposit modelling is crucial in areas of alluvium and aeolian deposits - see our guidance A shared Trent river crossing option that combines Cottam, West Burton and other adjacent Solar NSIPS accessing the grid via these outgoing coal burning power station connections is highly desirable to minimise archaeological impacts. Early attention should be paid to investigating crossing point options in this complex and dense archaeological	A desk-based geoarchaeological survey was undertaken to identify the paleoenvironmental potential of the Scheme and trial trench evaluation along the shared cable route (informed by the results of non-intrusive surveys). Particular attention was given to areas adjacent to the River Trent, where there was a heightened potential for alluvium and aeolian deposits. Assessment works were undertaken in collaboration with other proposed Solar Schemes and have been used to inform the final cable route in order to minimise impact on the



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	landscape. The reach of the Trent from around Marton / Littleborough to Torksey presents particularly acute archaeological risks with the combination of Roman and Viking activity and the presence of windblown sand and alluvial deposits and it will be important to allow as much time as possible to plan the design and mitigation of works in this area.	archaeological landscape running adjacent to the River Trent.
Historic England	We welcome a dynamic approach to setting assessment which is not overly constrained fixed radii (see out GPA 3 Setting of Heritage Assets) work should focus upon the particular significance of the assets under assessment and the impacts of the scheme thereon. In EIA scoping advice we highlighted the setting of the following assets (without prejudice to other issues that may emerge through assessment), viz the scheduled Broxholme medieval settlement and cultivation remains (NHLE 1016797), the scheduled Deserted village of North Ingleby (NHLE 1003570) and the scheduled Medieval bishop's palace and deer park, Stow Park (NHLE 1019229).	Assessment of the settings of designated heritage assets has been undertaken in accordance with the methodology proposed in the PEIR, which follows the guidance provided in Historic England's <i>GPAN3: The Settings of Heritage Assets.</i> This includes an assessment of the scheduled Broxholme medieval settlement and cultivation remains (NHLE 1016797), the scheduled Deserted village of North Ingleby (NHLE 1003570) and the scheduled Medieval bishop's palace and deer park, Stow Park (NHLE 1019229).
Historic England	Stow Park, the Medieval Bishop's Palace site and deer park is set on the Roman road from Lincoln to Doncaster a key line of communication between the see of Lincoln and York. Deer parks and palace / lodges offered a place for retreat, rest and entertainment of social and political peers, clients and Royal guests and were hence key spaces for the performance of the elite status of Bishops in the medieval landscape. The deer park is an architectural space, a place cut out from the overlapping and complex the medieval landscape, a place where rights were monopolised - in this instance the Bishop. At the heart of the significance of a medieval deer park is not just the functional containment and protection of deer and other resources but also their articulation as a space apart – a space imparked. This central aspect of significance would be profoundly compromised by the loss both of its rural character through the installation of panels and by it being subsumed into a new landscape of solar generation. The railway and associate ex MOD petroleum storage facility represented significant change to the former deer park by bisecting the site, but they have not fundamentally compromised the ability to experience the park as a space defined in the landscape. As one walks from the moated site at the north to the raised ground occupied by the farm buildings at the south of the park and then crosses the railway past the fuel depot to the farmstead and the south western part of the park one can still gain a sense of this as a bounded space.	The discussion of Stow Park and the Bishop's Palace in the Heritage Statement (ES Appendix 13.5 [EN010132/APP/WB6.3.13.5]) broadly concurs with this assessment and concludes that there would be a significant environmental effect at the Bishop's Palace and Stow Park as a result of the proposed development.



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Historic England	We made a site visit with the applicants consultants on 13th May 2022 to West Burton 1, 2 and 3 to initially assess impacts upon the Stow Park, Ingleby and Broxholme Scheduled Monuments. With regard to impacts upon those specific assets Historic England would have no objection to the proposals within West Burton 1 and 2 and noted that the design proposals at West Burton 2 had taken into account the setting of the Ingleby Scheduled Monument, by removing areas adjacent to the Scheduled Monument from any proposed development. On the basis of the indicative layout plans for panels with the pale of Stow Park we are as noted in the PEIR minded to object to installation of any part of the development within the former deer park (as defined by the lines of the scheduled Park Pale and its former course). Our concerns are focussed upon setting impacts upon the significance of the medieval bishop's palace and deer park SM 1019229 and we consider that the proposed sections of solar array sited within the medieval deer park at Stow would constitute substantial harm to the significance of the scheduled monument. That part of the scheme within the historic extent of Stow Park should we suggest be deleted prior to submission as it presents avoidable and unjustified harm to the significance of a nationally important designated heritage asset.	The Applicant considers that the removal of all of the proposed panels from within Stow Park would be too detrimental to the scheme and that the harm to the Scheduled Monument, though long term, would be temporary and reversible, and therefore should be weighed against the substantial public benefits of the scheme.