

Cottam Solar Project

Statement of Common Ground (FINAL) Historic England

Prepared by: Lanpro Services
February 2024

PINS Ref: EN010133
Document reference: EX5/C8.3.4_A
Infrastructure Planning (Examination Procedure) Rules 2010



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Issue Sheet

**Report Prepared for: Cottam Solar Project Ltd.
Examination Deadline 5**

Statement of Common Ground

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Original date: July 2023

Revision: [A] February 2024

1 Introduction

1.1 Purpose of this document

- 1.1.1 This Statement of Common Ground (SoCG) has been prepared as part of the proposed Cottam Solar Project Development Consent Order (the Application) made by Cottam Solar Project Ltd (the Applicant) to the Secretary of State for Energy Security and Net Zero (the Secretary of State) pursuant to the Planning Act 2008 (PA 2008).
- 1.1.2 This SoCG does not seek to replicate information which is available elsewhere within the Application documents. All documents are available on the Planning Inspectorate website.
- 1.1.3 This SoCG has been produced to confirm to the Examining Authority (ExA) where agreement has been reached between the parties, and where agreement has not yet been reached. SoCGs are an established means in the DCO consenting process of allowing all parties to identify and focus on specific issues that may need to be addressed during the examination.

1.2 Parties to this Statement of Common Ground

- 1.2.1 This SoCG has been prepared by (1) Cottam Solar Project Ltd as the Applicant and (2) Historic England (HE).
- 1.2.2 Collectively, Cottam Solar Project Ltd and HE are referred to as 'the parties'.

1.3 Terminology

- 1.3.1 In the table in the Issues chapter of this SoCG:
- "Agreed" indicates where the issue has been resolved.
 - "Not Agreed" indicates a final position, and
 - "Under discussion" indicates where these points will be the subject of ongoing discussion wherever possible to resolve, or refine, the extent of disagreement between the parties.

2 Record of Engagement

2.1 Summary of consultation

2.1.1 The parties have been engaged in consultation since the November 2021. A summary of the meetings and correspondence that have taken place between Cottam Solar Project and HE in relation to the Application is detailed in ES Chapter 13 [APP-048]. Consultation relevant to agreeing a Statement of Common Ground is outlined in **Table 2.1**.

Table 2.1 - Record of Engagement

Date	Form Correspondence	Key topics discussed and key outcomes
29.11.2021	Online meeting with Historic England (HE) and the Applicant.	<p>Initiation meeting to brief Historic England on the scope of the Scheme, assessment approach and potential archaeological survey, evaluation and mitigation strategies.</p> <p>Historic England highlighted need to avoid impacts to designated heritage assets.</p>
25.02.2022	Historic England (HE) Scoping Opinion	<p>No issues raised with the iterative approach proposed to assess the archaeological potential of land within the Scheme. HE looked forward to continued discussion regarding the setting effects on heritage assets and direct impacts on archaeological remains.</p> <p>HE noted that the Scheme involved significant cable infrastructure. HE stated the significance / character / importance of heritage assets needs to be understood from an early stage to allow for risk to be managed.</p> <p>The Scheme should look to find opportunities to reduce harm. Appropriate timeframes should be given to field evaluation, and any areas of heightened risk (i.e. burials, wet deposits and former water courses) should be given early attention.</p> <p>The following designated heritage sites and their setting were highlighted as being of particular interest:</p> <ul style="list-style-type: none"> • Grade I listed Church of St Mary, Stow • Scheduled Site of college and Benedictine abbey of St Mary, Stow

		<ul style="list-style-type: none"> • Grade I listed Church of St Laurence, Corringham • Scheduled Medieval Settlement and Moated Site, Coates • Grade I listed Church of St Edith, Coates by Stow • Scheduled Medieval Settlement, Thorpe • Grade II* Church of Andrew, Fillingham and Conservation Area • Grade I listed Fillingham Castle and Grade II Registered Park
13.05.2022	Site Visit with Historic England (HE) and the Applicant	<p>Site visit to Cottam 1 to assess the Thorpe le Fallows Scheduled Monument (deserted medieval village earthworks).</p> <p>Historic England confirmed that they would have no objection to the generality of proposals within Cottam 1, but they might request some offset of development from immediately adjacent to the northern edge of the Scheduled Monument (SM). This would be subject to further assessment of the nature and significance of the relationship between SM remains and the fields and field boundaries to the immediate north.</p> <p>No objections were stated in relation to the Cottam 2, 3a and 3b sites.</p>
25.05.2022	Online meeting with Historic England's Science Advisor and the Applicant	No objections were raised to the proposed methodology for evaluation works as carried out in the trenches thus far opened.
21.07.2022	Site visit with Historic England (HE), Lincolnshire Historic Places Team (LHPT) and the Applicant.	Site visit to Cottam 1 with Historic England Science Advisor. Agreed the trenching that had thus far been done was being undertaken to a high standard and that in those trenches seen there was a good correlation between results of the non-intrusive surveys and the evaluation trenching.
27.07.2022	Section 42 Consultation	HE noted " <i>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</i> ". HE referred the Applicant to LHPT to agree the scope of works.

		<p>HE stated that the landscape adjacent to the Trent is considered to contain a complex archaeological landscape. HE recommended that combined cable route option be explored that combines the Cottam, Gate Burton and West Burton Schemes.</p> <p>HE welcomed <i>“a dynamic approach to setting assessment which is not overly constrained fixed radii”</i> and highlighted the designated sites identified during in the scoping opinion (25.02.2022).</p> <p>With reference to the site visit with the Applicant on the 13.05.2022, HE stated <i>“we have no in principal objection to the proposals within Cottam 1, but we may need to see some offset of development from immediately adjacent to the northern edge of the scheduled monument to better address its significance and avoid what could otherwise be a likely significant environmental effect (as noted at PEIR para 13.6.3). This should be subject to further assessment of the setting relationship between scheduled remains and the fields and field boundaries to the immediate north which appear to fossilise the pattern of associated groups of field strips and hence historic landscape setting. We raised no other objections on the basis of that initial inspection in relation to the Cottam 2 and 3 sites”</i>.</p>
22.03.2023	Online meeting with Historic England (HE), Lincolnshire Historic Places Team (LHPT) and the Applicant.	<p>Meeting to establish a SoCG between HE, LHPT and the Applicant.</p> <p>Three main topics were discussed within the meeting: baseline information, evaluation trial trenching, and mitigation strategy.</p> <p>No concerns were raised regarding desk-based research or information acquired through non-intrusive evaluation techniques (i.e. air photo and LiDAR analysis, geophysical survey and desk-based geoarchaeological assessment).</p> <p>HE stated <i>“The scale of the areas that had not been subjected to evaluation trial trenching appeared to be quite large.”</i> HE <i>“expressed concern over absorption of a high level of risk through not evaluating ‘blank’ areas. Concerned that there is an observational bias if one only trenches the areas with apparent anthropogenic geophysical anomalies. It is not a binary choice of either no trenching in ‘blank’ areas or a high sample of trenches in those areas – believes that a middle ground could be achieved to proportionately manage risk.”</i> HE recommended <i>“Whilst it would be preferable to address additional trenching pre-consent, a phase of additional conditioned trenching post-consent</i></p>

		<p><i>(but as far ahead of construction as possible) would be a the next-best option to de-risk 'blank' areas once the client has DCO/further funds."</i></p> <p>No issues were raised by HE regarding the archaeological evaluation undertaken or the proposed mitigation strategy for the 'shared cable corridor' running between Till Bridge Lane and the Cottam Power Station.</p> <p>No issues raised by HE regarding proposed embedded mitigation by design (i.e. no development areas and concrete feet) or additional mitigation in the form of 'strip, map and sample', open excavation or archaeological watching brief. HE recommended that the area containing burials be considered as a no development zone (i.e. grass area), to reduce cost implications (and the highlighted the general ethical preference to leave human remains in the ground where possible). Whilst HE did not object to the pallet of design solutions / mitigation techniques these are inextricably linked to the confidence given from evaluation to inform the deployment of these techniques (see our relevant rep).</p>
27.03.2023 – 05.04.23	Email exchange between Historic England (HE), Lincolnshire Historic Places Team (LHPT) and the Applicant	<p>In response to the meeting on the 22.03.2023, and in line with comments from HE, the Applicant proposed a programme of post-determination trenching with a 1% sample in an email dated 27.03.2023 to HE and LHPT.</p> <p>HE recommended that this should be discussed with the LHPT (email dated 30.03.2023).</p>
28.03.2023	Historic England (HE) Relevant Representations (Ref EN010133)	<p>HE noted the Scheme had <i>"largely addressed the setting of designated heritage assets and earthwork monuments of equivalent importance through design (layout and deployment of green space) with the exception of Scheduled Monument NHLE ref 1016978 Thorpe medieval settlement where setting impacts are identified in the submitted environmental statement as 'moderate adverse' – 'significant' in EIA terms, which we would see as a considerable level of less than substantial harm in NPS/NPPF terms."</i></p> <p>HE stated that any unavoidable risk to buried archaeological remains should be well managed in proportion to their importance, and can be achieved through design (i.e. layout, deployment of green space and construction options for cabling and panel mounting). HE believes</p>

		<p><i>“archaeological risks can thus be well addressed, but only if there is a sound understanding of where archaeological sensitivity and importance lies across the site.”</i></p> <p>HE believes a sufficient field evaluation is vital as some features considered to be of a high importance (i.e. early medieval burial ground or high-status Roman buildings), will have a high sensitivity to the insertion panel mounting piles. HE acknowledges <i>“discussion is continuing as regards the extent of archaeological evaluation and deployment of intrusive and non-intrusive techniques, the reliance upon / complimentary nature of such techniques, and the timing there-of; all in the context of concerns around the management of archaeological and project risk.”</i></p> <p>HE defers the Applicant to local authority archaeological advisors (LHPT) to agree a sufficient level of evaluation work, written schemes of investigation and an overall archaeological strategy secured through DCO submission.</p> <p>HE welcomes a combined cable connection corridor with other solar NSIPs, as this has the potential to minimise cumulative impacts in archaeologically sensitive areas.</p>
22.06.2023	Online meeting with Historic England (HE) and the Applicant.	<p>Meeting to discuss the SoCG and identify if HE believed setting issues of designated heritage assets that had the potential to be impacted upon by the Scheme were appropriately mitigated. Particular focus was given to the Scheduled Medieval Settlement at Thorpe in the Fallows, and discussing HE’s reasoning for requiring panels to be removed between the SMV and a former historic east-west boundary recorded on the 1886 25-inch Ordnance Survey (OS) map.</p> <p>HE stated that they don’t certify the quality of work done in the ES Chapter, as this is for the applicant to demonstrate to The Planning Inspectorate. Consequently they are unable to agree to any items detailed within the SoCG that relate to scope or quality of works undertaken as part of the ES assessment.</p> <p>HE agreed that the assessment undertaken relating to designated heritage assets within the Cultural Heritage section of the ES is proportionate and any setting issues appropriately mitigated for all designated heritage assets, excluding Thorpe in the Fallows Scheduled Monument (1016978).</p>

		<p>HE considers the 50m buffer between the Thorpe in the Fallows shrunken Medieval Village (SMV) Scheduled Monument (1016978) and the solar panels is insufficient and does not address the impacts caused by the Scheme to the significance of the monument. HE recommends that the panels are removed between the SMV and a former historic east-west boundary recorded on the 1886 25-inch Ordnance Survey (OS) map (approximately along the line of grid points: SK90976 80920, SK91149 80944, SK91330 80904 and SK91351 80909). HE also stated that the design of the Scheme should look to recreate the character of the former field boundary i.e. a new hedgerow is planted along the rough course of the field boundary as recorded on the 1886 OS map.</p> <p>The Applicant explained their understanding of the relationship between the Thorpe in the Fallows SMV and the field to the north of the SMV. Namely, the SMV derives significance from the visual relationship with the fossilised medieval field boundaries that form the east and west boundaries of the field in question. Additionally, the SMV draws significance from the agricultural character of the open field, as historically the field would have formed an element of the agricultural land cultivated by the residents of Thorpe in the Fallows. The Heritage Statement has established the proposals will obscure views of the fossilised field boundaries and have an industrialising effect on the character of the field. The proposed 50m set back is intended to provide a buffer zone that illustrates the distinction between the SMV and the solar farm as well as providing a strip of land that illustrates the agricultural character of the field. The proposed set back will not avoid obscuring the fossilised field boundaries or having an industrialising effect on the character of the field. The Applicant believes the current proposed set back will achieve its intended aims. The increased set back suggested by HE will also provide a buffer and illustrate the historical agricultural nature of the field, but to no greater extent than the 50m set back and the increased set back would still obscure views of the fossilised field boundaries from the SMV as well as having an industrialising effect on the character of the field.</p> <p>The Applicant then enquired to HE's reasoning for off setting panels to the former east-west field boundary recorded on 19th-century historical maps, as desk-based research undertaken by the Applicant has demonstrated that there is no direct historical relationship between the scheduled Thorpe in the Fallows SMV and the east-west field boundary. During the medieval</p>
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		<p>period the landscape to the north of the SMV was likely to have formed large open agrarian fields. This is evidenced by the north-south orientated field boundaries running to the north of Thorpe in the Fallows SMV, which fossilise the former regimes of medieval cultivation; they have a clear reverse 'S' form indicative of medieval ridge and furrow. It can therefore be assumed that the east-west field boundary to the north of Thorpe in the Fallows post-dates the medieval village, and was in operation from post-medieval period until its removal during the second half of the 20th century.</p> <p>HE is of the opinion that by siting solar panels further away from the scheduled area, it would also reduce their prominence and therefore impact to the setting of the SMV. Their view was that the field boundary supplements the evolutionary history of the Thorpe in the Fallows Scheduled Monument as there is a structural relationship between the SMV and the transitional historic landscape to its north. Therefore, although the field boundary post-dates the medieval village, it helps to enhance the transitional historical setting of the SMV and allows the scheduled monument to be experienced in a more structured way.</p> <p>The Applicant believes that by removing panels between Thorpe in the Fallows and the former location of the east-west field boundary to the north of the village, as depicted on the 1886 OS map, the Scheme is respecting a post-medieval landscape, the setting and character of which are distinctly separate to the SMV and its immediate hinterland. By recreating the character of the field boundary recorded on the 1886 OS map, the Applicant believes there is the potential to alter the character of the setting of the medieval village, which would have been formed of large open fields, and consequently misrepresent the experience of the medieval village. It can be noted that only minor evidence of the field boundary was identified during the field evaluation. Geophysical survey identified a fragmented and dispersed series of anomalies suggestive that the feature had been ploughed out. Two evaluation trenches were targeted on the field boundary, based on historic maps and anomalies identified through the geophysical survey, but failed to identify any associated remains. This may be suggestive that as well as being transient within the post-medieval period, it was also of a relatively shallow construction.</p> <p>The Applicant also highlighted the temporary nature of the Scheme, as following decommissioning, the fields can be returned to their present state. The recreation of the former</p>
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		east-west field boundary would be problematic. In isolation the field boundary has a questionable heritage value, for example there should be a preference to preserving views between the SMV and the north-south orientated field boundaries running to the north of Thorpe in the Fallows SMV, which fossilise the former regimes of medieval cultivation.
30/01/2024	Online meeting with Historic England (HE) and the Applicant.	Discussion regarding mitigation for Thorpe in the Fallows. Positions of HE and the Applicant remain unchanged.

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

3 Issues

3.1 Matters Agreed

3.1.1 **Table 3.1** below details the matters agreed with Historic England (HE).

Table 3.1: Matters Agreed

Topic	Sub-topic	Details of Matters Agreed
HE-1 Approach to safeguarding designated heritage assets	Assessment and mitigation of designated heritage assets	<p>The assessment of designated heritage assets within a Heritage Statement (ES Chapter Appendix 13.5 [APP-125 to APP-128]), which was used to inform ES Chapter 13 [APP-048] is considered proportionate.</p> <p>Setting issues are considered appropriately mitigated for all designated heritage assets, excluding Thorpe in the Fallow Scheduled Monument (1016978) – see matters not agreed.</p>

3.2 Matters Under Discussion

3.2.1 **Table 3.2** below details the matters under discussion with Historic England (HE).

Table 3.2: Matters under discussion

Topic	Sub-topic	Details of Matters Under Discussion

3.3 Matters Not Agreed

3.3.1 **Table 3.3** below details the matters not agreed with Historic England (HE) (currently blank).

Table 3.3: Matters not agreed

Topic	Sub-topic	Details of Matters Not Agreed
<p>HE-2</p> <p>Approach to safeguarding designated heritage assets</p>	<p>Scheduled Monument Thorpe medieval settlement (NHLE ref 1016978)</p>	<p>HE and the Applicant are not in agreement as to appropriate mitigation of setting impacts upon the significance of Thorpe medieval settlement, a scheduled monument.</p> <p>HE is in agreement with the Applicant that the potential impact of the Scheme on the setting of Scheduled Monument Thorpe medieval settlement (NHLE ref 1016978), as identified in ES Chapter 13 [APP-048], is ‘moderate adverse’ – ‘significant’, which equates to less than substantial harm using NPS/NPPF classification.</p> <p>To mitigate against any potential impacts to the setting of Thorpe medieval settlement (NHLE ref 1016978), and in response to comments by HE during a site visit on 13.05.2022, the proposed development has been offset c.50m from the northern edge of the Scheduled Monument. In addition, a hedgerow is proposed to be located to the north of Thorpe in the Fallows to provide screening between the village and the Scheme.</p> <p>HE considers the 50m buffer is insufficient and does not address the impacts caused by the Scheme to the significance of the monument. HE recommends that the panels are removed between the SMV and a former historic east-west boundary recorded on the 1886 25-inch Ordnance Survey (OS) map (approximately along the line of grid points: SK90976 80920, SK91149 80944, SK91330 80904 and SK91351 80909). The design of the Scheme should look to recreate the character of the former field boundary. HE has stated the following:</p> <p><i>“The historic agrarian setting of the Thorpe le Fallows scheduled monument is important to its significance as the remains of a rural medieval settlement. Further to our rejection of the proposed c50m offset as insufficient to address the setting of the monument, we have</i></p>

		<p><i>advised that this specific field boundary should be reinstated as a limit to the solar array. This former boundary has a direct historic landscape relationship to the shrunken settlement remains to its south and the rising round upon which Thorpe le Fallows sits. The irregular line of this east-west boundary as shown on the 1st edition OS 1:2500 mapping suggests it sat in an organic relationship to the pattern of open-field cultivation stripes and associated land tenure, in contrast to the straighter more regular subdivision of strips characteristic of more structured enclosure. The significance of the monument is not set in a singular medieval moment of fully open fields and peak population that can be juxtaposed to an equally static post-medieval landscape of depopulation and enclosure. Central to the understanding and appreciation of shrunken or deserted medieval villages is that the archaeological remains we encounter relate to complex and extended processes of social and economic change; sudden changes may occur but they do not define the limit of interest or understanding. Significance is therefore [diachronic] concerned with the history and evolution of the monument in this landscape rather than [synchronic] confined to certain particular points in time. We have set out a reasonable measure to conserve and better reveal the significance of the scheduled monument, and reframe it in the context of the harm resulting from development's transformation of its agrarian setting. The reinstatement of this former boundary as a limit to the solar array is both proportionate and necessary to a sustainable planning outcome. The irregular character of the boundary is important to the effectiveness of this mitigation, any functional straight-line security fencing would need therefore to sit north of the reinstated boundary. To be effective as mitigation the reinstated boundary would need to be a laid hedgerow and would benefit from the inclusion of some standard trees for instance crab apple, field maple etc."</i></p> <p>Although the Applicant appreciates HE's position that the former east-west field boundary to the north of the village is a vital aspect of the evolution of the landscape to the north of the village and so helps create a structured relationship between the of the village and it immediate hinterland, with respect to the transitional historic character of Thorpe in the Fallows (meeting dated 22.06.2023), the Applicant considers that the east-west field boundary quintessentially belongs to a post-medieval to early modern landscape characterised by small enclosed fields, which is in direct contrast to</p>
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		<p>the medieval landscape which was formed by large open field systems. The scheduling of the Thorpe in the Fallows SMV pertains only to the medieval village, and so as such does not relate to the later post-medieval landscape. Therefore, the Applicant respectfully disagrees with the deduction that the former east-west field boundary contributes to the significance of the scheduled SMV, and that removing solar panels between the SMV and the field boundary would enhance the experience of the heritage asset/reduce impact. Further information detailing the Applicant's position can be found in the Applicant's Response to ExA First Written Questions (Response 1.9.9) [REP2-034], Written Summary of Applicant's Oral Submissions and Responses to Action Points at Issue Specific Hearing 2 (Agenda Item 3A) [REP3-033] and Applicant's Responses to Deadline 3A and 4 Submissions (Response 2.9.2) [EN010133/EX5/C8.1.32].</p> <p>The Applicant has calculated that the removal of the solar panels between the Thorpe medieval settlement SM and the former field boundary, as recommended by HE, would result in the loss of approximately 4.725 MWp of installed capacity and 5.5 MWh/year energy generation loss, based upon the indicative layouts that the Environmental Statement was based upon. The Applicant does however note that this figure is subject to change dependent upon future advances in technology which could increase the generating efficiency of panels.</p> <p>Historic England's most recent submission with regard to setting impacts upon Thorpe medieval settlement scheduled monument can be found at [REP4-079] Historic England Deadline 4 Submission - responses to the ExA's Second Written Questions.</p>
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4 Signatories

4.1 Overview

4.1.1 The above SoCG is agreed between Cottam Solar Project Ltd. (the Applicant) and Historic England (HE), as specified below.

Duly authorised for and on behalf of **Cottam Solar Project Ltd.**

Name:	Eve Browning
Job Title:	Senior Project Development Manager
Date:	27/02/24
Signature:	

Duly authorised for and on behalf of **Historic England (HE).**

Name:	Tim Allen
Job Title:	Team Leader (Development Advice)
Date:	27/02/24
Signature:	