

**Tillbridge Solar Project
EN010142**

**Volume 9
Statement of Common Ground with Historic
England**

Final

Document Reference: EN010142/APP/9.17

The Infrastructure Planning (Examination Procedure) Rules 2010

**October 2024
Revision Number: 00**

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Statement of Common Ground

This Statement of Common Ground has been prepared and agreed by Tillbridge Solar Project and Historic England.

Luke Murray, Director on behalf of Tillbridge Solar Limited

Date:.....18/10/24

Signed:..... 

Tim Allen, Team Leader Development Advice on behalf of Historic England

Date:.....18/10/24.....

Signed:..... 

1. Introduction

1.1 Purpose of this Document

- 1.1.1 This Statement of Common Ground (SoCG) has been prepared to support the application (“the Application”) for the Tillbridge Solar Project (“the Scheme”) made by Tillbridge Solar Limited (“the Applicant”). The Application was submitted to the Secretary of State for Energy Security and Net Zero (“the Secretary of State”) for a Development Consent Order (DCO) (“the Order”) under section 37 of the Planning Act 2008 (“PA 2008”) (Ref. 1) and accepted for examination on 8 May 2024.
- 1.1.2 This SoCG does not seek to replicate information which is available elsewhere within the Application documents. All documents are available in the deposit locations and/or on the Planning Inspectorate’s website at <https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN010142/documents>.
- 1.1.3 SoCGs are an established means in the planning process of allowing all parties to identify and focus on specific issues that may need to be addressed during the examination. 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. The SoCG will be progressed during the pre-examination and examination periods to reach a final position between the Parties and to clarify if any issues remain unresolved. This SoCG will be revised and updated as appropriate and/or required by the ExA at relevant examination deadlines.

1.2 Parties to this Statement of Common Ground

- 1.2.1 This SoCG has been prepared between (1) the Applicant and (2) Historic England (jointly referred to as the Parties).
- 1.2.2 The Applicant is a joint venture between Tribus Clean Energy Limited and Recurrent Energy, a subsidiary of Canadian Solar, who are both experienced developers of renewable energy projects.
- 1.2.3 Historic England (HE) are the Government’s advisor on all aspects of the historic environment in England, including historic buildings and areas, archaeology and historic landscapes. Historic England have a duty to promote conservation, public understanding and enjoyment of the historic environment. Historic England is listed as a prescribed consultee in Schedule 1 of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (Ref. 2) and so has been consulted during the preparation of the Application and following its acceptance.

1.3 The Scheme

- 1.3.1 The Order, if granted, would authorise the construction, operation (including maintenance), and decommissioning of ground-mounted solar photovoltaic

(PV) arrays. The Scheme will also include associated development to support the solar PV arrays.

- 1.3.2 The Scheme is made up of the Principal Site, the Cable Route Corridor and works to the existing National Grid Cottam Substation. The Principal Site comprises the solar PV arrays, electrical substations, grid balancing infrastructure, cabling and areas for landscaping and ecological enhancement.
- 1.3.3 The associated development element of the Scheme includes but is not limited to access provision; a Battery Energy Storage System (BESS), to support the operation of the ground mounted solar PV arrays; the development of on-site substations; underground cabling between the different areas of solar PV arrays; and areas of landscaping and biodiversity enhancement.
- 1.3.4 The Scheme also includes a 400kV underground Cable Route Corridor of approximately 18.5km in length connecting the Principal Site to the National Electricity Transmission System (NETS) at the existing National Grid Cottam Substation. The Scheme will export and import electricity to the NETS.

1.4 Terminology

- 1.4.1 Section 3 summarises the issues that are ‘agreed’, ‘not agreed’ or are ‘under discussion’.
- 1.4.2 These terms are used as follows:
- a. “Agreed” indicates where the issue has been resolved;
 - b. “Under discussion” indicates where these points will be the subject of on-going discussion wherever possible to resolve, or refine, the extent of disagreement between the parties;
 - c. “Not Agreed” indicates a final position where the Parties have agreed to disagree.

2. Record of Engagement

- 2.1.1 A summary of all meetings and correspondence that has taken place between the Parties in relation to the Application is outlined in **Table 1**. This includes email correspondence between the Parties to discuss sharing of information, arrangement of meetings and where appropriate to comment on draft documentation. **Table 1** reflects the key meetings and emails of note.

Table 1: Record of Engagement

Date and form of correspondence	Attendees	Key topics discussed and key outcomes
Heritage Stakeholder Teams meeting 28 November 2022	Lincolnshire County Council Historic Environment Officers; Bassetlaw District Council Officers; West Lindsey District Council Officer; Historic England	Introduction to the Scheme, discussion of deliverables and timeframes, extent of study areas, fieldwork update on the geophysical survey and expectations for trench evaluation.
Heritage Stakeholder Teams meeting 21 March 2023	Lincolnshire County Council Historic Environment Officers, Historic England Wessex Archaeology	Meeting to discuss approach for trial trench evaluation for the Principal Site and geoarchaeology scope. Agreement for Written Scheme of Investigation (WSI) submissions and sign-off agreed. Approach for monitoring site visits agreed and weekly reporting agreed.
Email 30 March 2023	Historic England Science Advisor	Approval and feedback on trial trench WSI.
Teams meeting 25 May 2023	Historic England Science Advisor Wessex Archaeology	Call to discuss geoarchaeology scope and fieldwork.
Email 12 June 2023	Lincolnshire County Council Historic Environment Officers, Historic England Science Advisor, Wessex Archaeology	Email setting out revised approach for fieldwork in relation to the Cable Route Corridor.
Email 28 June 2023	Historic England Science Advisor	Approval and feedback on the geoarchaeology WSI.
Teams Meeting 8 August 2023	Lincolnshire County Council Historic Environment Officers,	Meeting to discuss progress of trial trench evaluation of Principal Site. Emerging areas of archaeological significance and early

Date and form of correspondence	Attendees	Key topics discussed and key outcomes
	Historic England Science Advisor	discussion to inform the development of appropriate mitigation measures, including preservation areas including proposed methods for grassland creation.
Teams meeting 24 August 2023	Historic England Team Leader	Call to discuss design and impacts in relation to high value heritage assets at Harpswell and Glentworth, with suggestions for mitigation.
Email 13 September 2023	Historic England Team Leader	Email communication from Historic England with feedback following their site visit, with reiteration of the advice given at the meeting held 24 August 2023.
Email 29 January 2024	Historic England Science Advisor	Review and feedback on the geoarchaeological report.
Teams Meeting 8 August 2024	Historic England Team Leader	Meeting to go through Relevant Representation comments.

3. Areas of Discussion between the Parties

3.1.1 Table 2 below details the areas of discussion and matters that are agreed, under discussion and not agreed between the Parties.

Table 2 Areas of Discussion with Historic England

Ref.	Relevant Application Document	Description of Matter	Status
1.1	<p>Chapter 8: Cultural Heritage [APP-039], Sections 8.8 and 8.9</p> <p>Appendix 8-2: Cultural Heritage Desk Based Assessment [APP-059]</p> <p>Appendices 8-5-1: Principal Site Geophysical Survey Report [APP-065 and APP-066]</p> <p>Appendix 8-5-2: Cable Route Corridor Geophysical Survey Report [APP-067]</p>	<p><u>Historic England’s Comment:</u></p> <p>We welcome a palette of mounting techniques and the informed use of open grassland areas to allow for the management physical impacts upon buried remains. In addition to the focus upon the impact of the panel arrays, fencing substations etc we note 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. Opportunities to share cable routes with other schemes should be actively sought. 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 heightened 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.</p> <p><u>Applicant’s response:</u></p> <p>With regard to the Cable Route Corridor both known heritage assets and those identified by a programme of archaeological evaluation undertaken for the Scheme and adjacent solar projects have been identified and</p>	<p>Agreed – HE comment has been addressed.</p>

Ref. Relevant Application Document	Description of Matter	Status
	<p>where potentially impacted assessed in the ES chapter. Where possible a shared cable route has been used and opportunities to avoid heritage assets considered such as the use of trenchless excavation techniques to avoid archaeological remains where possible.</p>	
<p>1.2 Chapter 8: Cultural Heritage [APP-039]</p>	<p><u>Historic England’s Comment:</u> Given the landscape scale of this and associated (nearby) projects the schemes should seek to address structures research questions about this landscape to ensure that localised archaeological interventions contribute to a whole (in terms of public value) which is more than the sum of their parts.</p> <p><u>Applicant’s Response:</u> The East Midlands Historic Environment Research Framework was considered when defining the aims and objectives of the archaeological evaluation for the Scheme. It will also be used to inform the aims and objective of archaeological mitigation measures proposed in the Archaeological Mitigation Strategy [EN010142/APP/9.5].</p>	<p>Agreed – HE comment has been addressed.</p>
<p>1.3 Chapter 8: Cultural Heritage [APP-039] Appendix 8-2: Cultural Heritage Desk Based Assessment [APP-059]</p>	<p><u>Historic England’s Comment:</u> It is of particular importance to note to that the scheduled areas at Torksey, Littleborough etc only reflect those areas of national important remains identified in those particular designation episodes – remains are now known to extend more widely and there is high potential for further remains of national importance to survive in this extremely sensitive section of the Trent.</p>	<p>Agreed – HE comment has been addressed.</p>

Ref. Relevant Application Document	Description of Matter	Status
	<p><u>Applicant's Response:</u> Comment noted. Non-designated heritage assets considered to be of potentially national importance have been identified and assessed as such e.g. Winter Camp of the Viking Great Army at Torksey [MLI125067] within Appendix 8-2: Cultural Heritage Desk Based Assessment of the ES [APP-059] and Section 8.9 of Chapter 8: Cultural Heritage of the ES [APP-039].</p>	
<p>1.4 Chapter 8: Cultural Heritage [APP-039] Appendix 8-2: Cultural Heritage Desk Based Assessment [APP-059]</p>	<p><u>Historic England's Comment:</u> As set out in our Good Practice Advice (GPA) 3 Setting of Heritage Assets (Ref. 3), a structured approach to setting impacts should be undertaken, it is generally unwise to apply a rigid radius for the assessment of setting effects, targeting for assessment should consider topography, designed and borrowed landscape relationships and the role of movement through the landscape as well as fixed point views and vista.</p> <p><u>Applicant's response:</u> The approach to assessing setting set out in GPA 3 has been followed when considering the value and potential affects experienced by heritage assets within Section 8.4 and 8.9 of Chapter 8: Cultural Heritage of the ES [APP-039] and Appendix 8-2: Cultural Heritage Desk Based Assessment of the ES [APP-059]. Study areas have been agreed with the stakeholders.</p>	<p>Agreed – HE comment has been addressed.</p>
<p>Statutory Consultation</p>		
<p>2.1 Chapter 8: Cultural Heritage [APP-039]</p>	<p><u>Historic England's Comment:</u></p>	<p>Agreed – HE comment has been addressed.</p>

Ref. Relevant Application Document	Description of Matter	Status
	<p>The categorisation of designated and non-designated assets into High / Medium / Low value should allow more scope for professional judgement and consultee advice.</p> <p><u>Applicant's response:</u> The value of heritage assets has been assessed taking into account advice from statutory consultees as well as considered professional judgement with peer review. Likewise with archaeological remains including those identified during the archaeological fieldwork.</p> <p>A methodology for the assessment of value is given in paragraphs 8.4.22 to 8.4.25 of the ES chapter [APP-039].</p>	
<p>2.2 Chapter 8: Cultural Heritage [APP-039]</p>	<p><u>Historic England's Comment:</u> The use of fixed study areas should allow for the application of professional judgement and consultee advice in respect of setting effects.</p> <p><u>Applicant's response:</u> Setting effects are assessed and identified where applicable using professional judgement including the wider Zone of Theoretical Visibility identified by the landscape team taken into account for assets between 3-5km from the Principal Site.</p> <p>The approach to the study areas is detailed in paragraphs 8.4.1 to 8.4.8 of the ES chapter [APP-039].</p>	<p>Agreed – HE comment has been addressed.</p>

Ref. Relevant Application Document	Description of Matter	Status
<p>2.3 Chapter 8: Cultural Heritage [APP-039] Appendices 8-6-1 to 8-6-10 [APP-069 to APP-078].</p>	<p><u>Historic England’s Comment:</u> The advice of the local government archaeological curators especially in respect of fieldwork management should be closely adhered to.</p> <p><u>Applicant’s response:</u> The Applicant has been consulting closely with the Lincolnshire County Council (LCC) historic environment curators throughout the fieldwork programme, as well as Historic England’s scientific advisor for geoarchaeological matters. All WSIs were agreed in advance, with weekly monitoring visits carried out by LCC historic environment officers during the trench evaluation programme within the Principal Site.</p> <p>Fieldwork reports detailing the result of the trial trench evaluation and acknowledging monitoring of the works by LCC’s Historic Environment officers are provided in Appendices 8-6-1 to 8-6-10 of the ES [APP-069 to APP-078].</p>	<p>Agreed – HE comment has been addressed.</p>
<p>2.4 Chapter 8: Cultural Heritage [APP-039] Appendix 8-2: Cultural Heritage Desk-Based Assessment [APP-059] Archaeological Mitigation Strategy [EN010142/APP/9.5]</p>	<p><u>Historic England’s Comment:</u> Regarding the increased the extent of the Order limits falling within Stow Park Road/Till Bridge Lane (A1500) to the east of Marton and within Till Bridge Lane (West and East) (A1500) to the east of Marton.</p> <p>We note the proposed amendments to the Order limits, we have identified potential for additional impacts upon archaeological remains at the references above on the line of the Roman Road between Lincoln and Doncaster to the north of Stow Park (medieval bishops palace / hunting park) and associated remains of hamlet.</p>	<p>Agreed – HE comment has been addressed.</p>

Ref. Relevant Application Document	Description of Matter	Status
	<p>Whilst archaeological impacts associated with the above changes to the Order limits are unlikely to amount to a significant environmental effect themselves, this should nevertheless be addressed in archaeological mitigation.</p> <p><u>Applicant's response:</u> Heritage assets within the Order limits are identified as scoped into/out of the impact assessment in Appendix 8-2: Cultural Heritage Desk-Based Assessment of the ES [APP-059].</p> <p>Section 8.9 of Chapter 8: Cultural Heritage of the ES [APP-039] includes an assessment of impacts on all heritage assets likely to be affected within the heritage study areas of the Scheme and outlines mitigation proposed. An Archaeological Mitigation Strategy [EN010142/APP/9.5] is submitted following consultation with LCC Historic Environment Officers at Deadline 1.</p>	
Relevant Representation	<p><u>Historic England's Comment</u> With regards to buried archaeological remains it is important that risk of avoidable / unmitigated damage to sensitive remains is well managed in proportion to their importance. This can be achieved through layout, deployment of green space and construction options for cabling, panel mounting etc. Archaeological risks can thus be well addressed with a sound understanding of where archaeological sensitivity and importance lies across the site and cable corridor.</p>	<p>Agreed – HE comment has been addressed.</p>

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In this instance the applicant has undertaken extensive archaeological investigations which provides a sound basis for such impacts to be understood and addressed. We note that the applicant has engaged constructively with our advice in respect of both direct and setting impacts upon heritage assets. We note and welcome significant efforts to design out impacts.

We note the setting impact assessments both in respect of this scheme and cumulatively in association with other Nationally Significant Infrastructure Projects, these will provide a basis for the ExA to weigh impacts against public benefits.

For more detailed discussion of archaeological matters we refer you in the first instance to the expertise of local authority archaeological advisors. It is they who will (should DCO be granted with appropriate requirements) advise upon the acceptability of WSIs and their accordance with a robust overall archaeological strategy secured through DCO submission.

Applicant's response

An **Archaeological Mitigation Strategy [EN010142/APP/9.5]** identifying proposed areas for archaeological mitigation, including both preservation and archaeological investigation and recording, and recommendations for appropriate methods of archaeological investigation is submitted at Deadline 1, following consultation with LCC and NCC Historic Environment Officers.

Ref. Relevant Application Document	Description of Matter	Status
	<p>The potential national significance and complexity of deposits within the winter camp of Viking Great Army has been highlighted within the site-specific description of mitigation Site 25 at Appendix C Archaeological Sites – Cable Route Corridor (page 169) of the AMS. This includes bibliographic references to the results of previous archaeological investigations undertaken by the Torksey Viking Project (Hadley et al 2016 and 2023) as discussed in the meeting held with Historic England on 11 September 2024.</p>	
Additional Comments		
<p>4.1 Chapter 8: Cultural Heritage [APP-039]</p>	<p><u>Historic England’s Comments relating to Teams Meeting 24 August 2023:</u></p> <p>A meeting was held to discuss the impacts on the setting for the scheduled monument at Harpswell Hall and the Grade II* Glentworth Hall. The moderate adverse impact assessed at Preliminary Environmental Information (PEI) Report stage on the assets at Harpswell was considered correct by Historic England noting their recommendation that this could be reduced if mitigation by design is implemented.</p> <p>Email correspondence on the 13 September 2023 from Historic England noted:</p> <p><i>“In the case of Glentworth pushing the edge of the array west to exclude the field with moat would be likely to reduce impacts (setting) upon the designated assets at Glentworth to a non-significant level in EIA terms.</i></p> <p><i>At Harpswell a general shift back of the eastern edge of the array (within the former park as shown on the first OS 1" survey) would give the surviving core of the designed landscape and house etc more room to</i></p>	<p>Agreed – HE comment has been addressed.</p>

Ref. Relevant Application Document

Description of Matter

Status

articulate in something of its historic manner - and would bring the field containing the line of the stream / leat linking to the Harpswell moat out of the array and potentially into a wet grassland buffer. This slightly lower lying string of fields are important to how the core of the Harpswell assets spoke to the wider park. This modification would likely move you to non-significant level of impact upon the Harpswell assets in EIA terms."

Applicant's response:

Embedded mitigation includes removal of solar panels in Field 122 closest to the assets with biodiversity enhancement, west of Northlands Cottages. Field 124, which includes SAS 22 associated with archaeological remains of the moated site [MLI50291] part of the historic deer park, has been designated an area of biodiversity enhancement with proposed new native woodland planting along its eastern boundary. This embedded mitigation took account of consultation with Historic England in August 2023, to reduce impacts upon the setting and planned views of Glentworth Hall by pushing the solar array further away from the heritage assets to avoid severance of the historic landscape preserving it as open countryside retaining its legibility and historic relationship with the Hall. This contributed to a revision of the PEI Report assessment to one that is minor adverse and not significant, as set out in Section 8.9 of **Chapter 8: Cultural Heritage** of the ES [APP-039].

In relation to the scheduled monument at Harpswell Hall, the design for Fields 108 and 109 was altered from inclusion of solar panel arrays to biodiversity enhancement zones, with planting along the fields boundaries to partly screen any views of the Scheme from Harpswell but also to replicate the effect of the earlier platoon tree planting in views

Ref. Relevant Application Document	Description of Matter	Status
	<p>west from the monument, particularly along the eastern boundaries of Fields 108 and 109. Embedded mitigation with the movement of solar arrays and Scheme infrastructure to fields further west, away from the scheduled monument, and with the introduction of screen planting, would result in a minor adverse (not significant) effect. Refer to Section 8.9 of Chapter 8: Cultural Heritage of the ES [APP-039].</p> <p>The meeting held with Historic England on the 8 August 2024 discussed the embedded mitigation in relation to these two heritage assets and agreed that the initial concerns had been addressed reducing the impacts upon them.</p>	
4.2 Chapter 18: Cumulative Effects and Interactions [APP-049]	The conclusions on cumulative impacts set out within Chapter 18: Cumulative Effects and Interactions, Section 18.9 of the ES [APP-049] are agreed.	Agreed
4.3 Archaeological Mitigation Strategy [EN010142/APP/9.5]	<p>The principles set out within the Archaeological Mitigation Strategy [EN010142/APP/9.5] are agreed. Historic England refers the Applicant to Lincolnshire County Council's archaeological advisor on the detail of the strategy.</p> <p><u>Applicant's response</u></p> <p>The Archaeological Mitigation Strategy has been prepared in consultation with Historic England and the Historic Environment Officers at Lincolnshire and Nottinghamshire County Councils and takes into account comments received regarding the strategy and mitigation measures proposed.</p>	Agreed

Ref. Relevant Application Document	Description of Matter	Status
4.4 Archaeological Mitigation Strategy [EN010142/APP/9.5]	The geoarchaeology approach as set out within the Archaeological Mitigation Strategy [EN010142/APP/9.5] are agreed with Historic England’s Science Advisor for the East Midlands.	Agreed
4.5 draft DCO [EN010142/APP/3.1(Rev03)]– Schedule 2, Requirement 11	<p>The draft DCO [EN010142/APP/3.1(Rev03)] has been updated at Deadline 1 to include the following Requirement 11 wording:</p> <p>11.— (1) The authorised development must be implemented in accordance with the archaeological mitigation strategy.</p> <p>(2) No part of the authorised development may commence until a written scheme of archaeological investigation (which must accord with the archaeological mitigation strategy) for that part has been submitted to and approved by the relevant planning authority.</p> <p>(3) For the purposes of sub-paragraph (2), “commence” includes any permitted preliminary works.</p> <p>(4) Any archaeological works or archaeological monitoring and recording must be carried out in accordance with the approved scheme.</p>	Agreed
4.6 Harm Statement	The conclusions detailed in the Harm Statement , provided in Appendix C of the Planning Statement [APP-211] , are agreed.	Agreed

4. References

- Ref. 1 His Majesty's Stationary Office (HMSO) (2008) Planning Act 2008. Available at: <https://www.legislation.gov.uk/ukpga/2008/29/contents> [Accessed 09/09/2024]
- Ref. 2 HMSO (2009) Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009. Available at: <https://www.legislation.gov.uk/uksi/2009/2264/contents/made> [Accessed 09/09/2024]
- Ref. 3 Historic England (2017) The Setting of Heritage Assets. Historic Environment Good Practice Advice in Planning Note 3 (Second Edition). Available at: <https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/heag180-gpa3-setting-heritage-assets/> [Accessed 10/09/2024]