

Springwell Solar Farm

Draft Statement of Common Ground

Historic England

EN010149/APP/8.3
Version 1
Deadline 1
June 2025
Springwell Energyfarm Ltd

Rule 8(1)(e)
Planning Act 2008
Infrastructure Planning (Examination
Procedure) Rules 2010

1. Introduction

1.1. Overview

- 1.1.1 This Statement of Common Ground (SoCG) has been prepared in respect of the application for the proposed Springwell Solar Farm Development Consent Order (the Application) made by Springwell Energyfarm Ltd (the Applicant) to the Secretary of State for Energy Security and Net Zero under section 37 of the Planning Act 2008 (PA 2008).
- 1.1.2 Springwell Solar Farm is a proposed new solar farm and battery storage facility located in North Kesteven, Lincolnshire. The proposals also include infrastructure to connect Springwell to the National Grid, as well as any necessary supporting site infrastructure and environmental mitigation, including landscaping and ecological planting (the Proposed Development).
- 1.1.3 This SoCG is submitted to the Examining Authority as an agreed draft between both parties. It will be amended as the examination progresses in order to enable a final version to be submitted to the Examining Authority.

1.2 Parties to this Statement of Common Ground

- 1.2.1 This SoCG has been prepared by the Applicant and Historic England.
- 1.2.2 Historic England is a statutory consultee on the historic environment and continues to provide expert advice in relation to the assessment and mitigation of impacts on heritage assets throughout the DCO process.
- 1.2.3 Historic England 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.
- 1.2.4 The above matters of interest discussed with Historic England are detailed in **Section 4** of this SoCG.
- 1.2.5 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.
- 1.2.6 Collectively, the Applicant and Historic England are referred to as 'the parties.'

1.3 Purpose of this document

- 1.3.1 This SoCG is being submitted to the Examining Authority as an agreed draft between both parties. This SoCG is a 'live' document and will be amended as the examination progresses in order to enable a final version to be submitted to the Examining Authority.

1.3.2 The SoCG has been prepared in accordance with the Department for Levelling Up, Housing and Communities' Guidance on the examination stage for Nationally Significant Infrastructure Projects (DLUHC Guidance)¹.

1.3.3 Paragraph 007 of the DLUHC Guidance comments that:

“A Statement of Common Ground (SoCG) is a written statement prepared jointly by the applicant and another party or parties, setting out any matters on which they agree, or indeed disagree. A SoCG helps to ensure that the evidence at the examination focuses on the material differences between the main parties and therefore makes best use of the lines of questioning pursued by the Examining Authority”.

1.3.4 The aim of this SoCG is, therefore, to provide a clear position of the progress and agreement met or not yet met between Historic England and the Applicant on matters relating to the Application.

1.3.5 The document will be updated as more information becomes available and as a result of ongoing discussions between the Applicant and Historic England.

1.3.6 The SoCG is intended to provide information for the examination process, facilitate a smooth and efficient examination, and manage the amount of material that needs to be submitted.

1.3.7 Once finalised, the SoCG will be submitted to the Examining Authority that is examining the Application under section 37 of the PA 2008 for an order granting development consent for the Proposed Development.

1.3.8 For the purposes of examination, this SoCG addresses the following key topic areas:

- Assessment methodology;
- Designated heritage assets; and
- Non-designated heritage assets.

1.4 Terminology

1.4.1. This SoCG summaries the main topics covered and the status of the matter. The colour coding system used within the table within **Section 4** has been described below.

Cell	Status
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	Agreed – indicates where an issue has been resolved.
	Under Discussion – indicates where points continue to be the subject of on-going discussions between the parties.
	Not Agreed - indicates a position where both parties have reached a final position that a matter cannot be agreed between them.

¹ Planning Act 2008: Examination stage for Nationally Significant Infrastructure Projects (30 April 2024).

2. The Proposed Development

2.1 Proposed Development Description

- 2.1.1 The Proposed Development comprises the construction, operation and maintenance, and decommissioning of a solar photovoltaic (PV) array electricity generating facility with a total capacity exceeding 50 megawatts (MW), a Battery Energy Storage system (BESS) with an import and export connection to the National Grid Electricity Transmission.
- 2.1.2 The Proposed Development comprises the installation, construction and decommissioning works, with the details to be defined at detailed design and subject to approval by the Local Authority. The detailed design of the Proposed Development will be undertaken within the parameters assessed in the Environmental Statement (ES), which are secured through a range of control documents including the **Works Plans [EN010149/APP/2.3] [APP-007]**, the **Design Commitments [EN010149/APP/7.4] [APP-0138]** and the requirements set out in the **draft Development Consent Order [EN010149/APP/3.1.2]**.
- 2.1.3 The design of the Proposed Development has evolved throughout the environmental assessment process to avoid or minimise environmental effects and in response to consultation and engagement feedback, where appropriate. The location of the Proposed Development is shown in **ES Volume 2, Figure 1.1: Location Plan [EN010149/APP/6.2] [APP-058]** and described in **ES Volume 1, Chapter 2: Location of the Proposed Development [EN010149/APP/6.1.2]**, with the consideration of alternatives and the evolution of the design of the Proposed Development presented in **ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010149/APP/6.1] [APP-044]**.
- 2.1.4 The Proposed Development will be located within the 'Order Limits' (the land shown on the **Works Plans [EN010149/APP/2.3] [APP-007]** within which the Proposed Development can be constructed, operated and decommissioned). The extent of the Order Limits is shown on **ES Volume 2, Figure 1.2: Order Limits [EN010149/APP/6.2] [APP-058]**. The principal components of the Proposed Development include:
- Solar PV development including;
 - Ground-mounted Solar PV generating station. The generating station will include Solar PV modules and mounting structures;
 - Balance of Solar System (BoSS), which comprises inverters, transformers, and switchgear;
 - 400kV Grid Connection Corridor to connect the Springwell Substation and proposed National Grid Navenby Substation;
 - Satellite Collector Compounds comprising switchgear, transformers, ancillary equipment and operation, maintenance, security and welfare units;
 - A project substation (the 'Springwell Substation') compound, which will include substation, Main Collector Compound, switching and control equipment, office/control/welfare/security buildings, storage areas, and provisions for vehicular parking and material laydown;

- BESS compound, including batteries and associated inverters, transformers, switchgear and ancillary equipment and their containers, enclosures, monitoring systems, air conditioning, electrical cables, fire safety infrastructure and operation, maintenance, security and welfare facilities;
- Underground cabling will connect the Solar PV modules and BESS compound to the BoSS, Collector Compounds, and the Springwell Substation;
- Ancillary infrastructure works, including boundary treatments, security equipment, earthing devices, fencing, lighting, earthworks, surface water management, internal tracks and any other works identified as necessary to enable the Proposed Development;
- Landscaping, habitat management, biodiversity enhancement and amenity improvements; and
- Works to facilitate vehicular access to the Order Limits.

3. Record of Engagement

3.1 Summary of engagement

- 3.1.1 The Applicant has engaged with Historic England throughout the Development Consent Order application process, including during early stages of the design and environmental assessment of the Proposed Development.. **Table 1** shows a summary of key engagement that has taken place between the Applicant and Historic England in relation to the Application.

Table 1 – Record of Engagement

Date	Form of correspondence	Key topics discussed and key outcomes
20 June 2023	Virtual meeting	- Introduction of the project and discussion of the work carried out including summary of geophysical survey results. - Historic England recommended producing a deposit model to map the distribution of buried deposits of archaeological interest and to investigate the reasons for differences in the distribution of geophysical anomalies of likely archaeological origin within the Order Limits. A geoarchaeological deposit model was produced for the assessment (ES Volume 3, Appendix 9.2: Geoarchaeological Deposit Modelling Report [EN010149/APP/6.3] [APP-098])
23 January 2025	Virtual meeting	- Update on surveys and assessments completed to date. - Historic England will review documentation submitted with the application and a follow up meeting arranged for 6th February to discuss further. - Historic England suggested that further trial trenching in the cable route corridors may be appropriate to fully investigate the importance and significance of the archaeological remains in these areas.
6 February 2025	Virtual meeting	- Discussion and clarification of queries raised by Historic England following their review of key documentation submitted as part of the application. - Discussion and clarification provided to Historic England on the area of Solar PV development and Order Limits. This was particularly related to the observed distance from Brauncewell and Blankney which was discussed and clarified that this has been

Date	Form of correspondence	Key topics discussed and key outcomes
		included to allow for a permissive footpath route to connect these villages with the wider Public Right of Way (PRoW) network. • Summary and discussion of the approach to key heritage assets and below ground archaeology.
9 April 2025	Virtual meeting	• Clarification of where “non-significant” effects are addressed in the application (Appendix 12 of Planning Statement [EN010149/APP/7.2.2] [AS-018]). • Discussion of approach taken regarding the pre-application trenching – high impact areas (Substation, BESS and Collector compounds) have been assessed and this is supported by Historic England • Discussion of how post-determination trenching will inform the detailed design. Suggested that this is further clarified in the WSI or a controlled document • Discussion of whether sufficient flexibility remains in the parameters for the cable routes if things are found during trenching. • Historic England confirmed that they would not recommend a fixed % of trenching • Discussion of the two Roman Roads (A15 and projected line to the east) being of higher archaeological potential even in the absence of geophysical anomalies. • Historic England raised a concern as to whether the approach to targeting post-consent trenching on higher density areas in the geophysical survey would sufficiently account for unknown remains. Agreed the Applicant would carry out another review all non-intrusive surveys for any additional areas of likely archaeological potential.
28 April 2025	Virtual meeting (jointly with LCC and NKDC archaeology officers)	• Agreed that the Outline WSI would be updated and that further discussion to define the scope of post-DCO trenching and mitigation work would be carried out during the examination. Historic England suggested that further evaluation work may not necessarily be intrusive trenching but could be further non-

Date	Form of correspondence	Key topics discussed and key outcomes
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- intrusive techniques such as fieldwalking, though noted with regret that this is a technique rarely employed
- Historic England also suggested that further synthesis / analysis of the desk-based data and non-intrusive surveys could also inform targeting of post-DCO archaeological work.

4. Current Position

4.1 Position of the Applicant and Historic England

- 4.1.1 The following tables set out the position of the Applicant and Historic England, following a series of meetings and discussions with respect to the key areas of the Proposed Development. This includes matters where discussions are ongoing.
- 4.1.2 As noted above, this is a 'live' document, and some aspects have yet to be agreed upon between both parties. The intention is to provide a final position in subsequent versions of the SoCG, addressing and identifying where changes have been made, and ultimately, documenting agreement by both parties on relevant points.

Table 2 – Position of the Applicant and Historic England

Ref.	Description of Matter	Historic England's Comment	Applicant's Response	Status
Assessment methodology				
2.1	Requirement 11	Historic England have concerns with the wording in the draft DCO [EN010149/APP/3.1] [APP-012] Requirement 11, specifically the use of the term 'substantively' in paragraph 11(2), which could potentially introduces ambiguity and risk of dispute at post-DCO approval stage. Historic England suggest that parts referenced in the requirement are intended to be spatial units rather than stages of an iterative investigation process. Historic England also highlight the lack of a mechanism for incorporating post-DCO evaluation results into mitigation strategies, which should influence the approval of archaeological mitigation methods. Historic England compares this to other DCOs (Mallard Pass, Cottam/West Burton Solar schemes), where mechanisms were included to ensure post-DCO evaluation results impacted mitigation decisions. They advocate for similar mechanisms to be included in the current draft to ensure proper consideration of evaluation results in mitigation.	The oWSI [EN010149/APP/7.15] [APP-0148] is intended to provide a framework for task / location specific WSIs which would inform the mitigation measures to be implemented through the detailed design. The oWSI [EN010149/APP/7.15] [APP-0148] contains provision for both pre-commencement archaeological investigation and for construction phase archaeological monitoring and recording. Any pre-commencement investigations would be subject to task specific WSIs. Where the oWSI [EN010149/APP/7.15] [APP-0148] provides for archaeological monitoring and recording during construction a task specific WSI will be agreed with the planning authority prior to construction. In terms of the use of "substantially" this is very standard drafting in DCO requirements, and is advantageous as it allows the	Under Discussion

Ref.	Description of Matter	Historic England's Comment	Applicant's Response	Status
		The mechanism in the archaeology requirement for approval of WSI's and approval of updated / supplemented archaeological mitigation strategy is work in progress with LCC principally.	mitigation to be tailored to the detailed design of the Proposed Development, rather than needing to accord rigidly to something drafted many years previously.	

Designated heritage assets

2.2	Heritage assets	At Statutory Consultation, Historic England noted that they acknowledge the approach taken to assess the importance, magnitude of impact, and significance of effect on heritage assets. However, Historic England emphasise that all Grade II listed buildings and Conservation Areas are designated assets, and any level of harm must be given special regard, attention, and great weight in decision-making. Identifying significant or non-significant effects in EIA terms does not fully encompass the considerations required by the decision-maker. Additionally, while the inclusion of a 'very high' importance category may be relevant for assets of international significance, Historic England stresses that this should not diminish the attention given to the effects on Scheduled Monuments, Grade I, and Grade II listed assets*, which remain of national importance.	An assessment of heritage assets is included within the ES which can be found in ES Volume 1, Chapter 9: Cultural Heritage [EN010149/APP/6.1.2] [AS-012]. This is supported by several technical appendices provided in ES Volume 3, Appendix 9.1: Archaeological Desk-Based Assessment and Stage 1 Setting Assessment [EN010149/APP/6.3.2] [AS-014]; Appendix 9.2: Geoarchaeological Deposit Modelling Report [EN010149/APP/6.3] [APP-098]; Appendix 9.3: Aerial Investigation Report [EN010149/APP/6.3] [APP-099]; and Appendix 9.4: Geophysical Survey Report (Part 1 to 6) [EN010149/APP/6.3] [APP-100] - [APP-106]. ES Volume 3, Appendix 9.1: Archaeological Desk-Based Assessment and Stage 1 Setting Assessment [EN010149/APP/6.3.2] [AS-014] provides	Agreed
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Ref.	Description of Matter	Historic England's Comment	Applicant's Response	Status
			further detail on the importance of each heritage asset that has been identified, including Grade II listed buildings, Conservation Areas and designated assets. A Heritage Statement has also been produced, which forms Appendix 12 to the Planning Statement [EN010149/APP/7.2.2] [AS-018] which provides further detail on the level of harm for each of the heritage assets identified in ES Volume 1, Chapter 9: Cultural Heritage [EN010149/APP/6.1.2] [AS-012] that may experience significant adverse effects on its heritage value and the designated heritage assets for which non-significant effects are predicted. Harm to heritage assets has therefore been adequately identified in accordance with National Policy Statement.	Agreed
2.3	Desk Based Assessment (DBA)	Historic England recommended during a pre-application meeting held in June 2023 to add PAS data to DBA as well as to include the reassessment of listed buildings and setting outwith the current study area.	A search of PAS data has been undertaken and this is detailed within the Archaeology Desk-Based Assessment and Stage 1 Setting Assessment which is located in ES Volume 3, Appendix 9.1 [EN010149/APP/6.3.2] [AS-014]. In summary, a search of the PAS data has shown no findspots within the Order Limits.	

Ref.	Description of Matter	Historic England's Comment	Applicant's Response	Status
			Within the 2km surrounding the Order Limits there are 138 PAS findspots recorded, the majority of which are Roman in date. Further detail on listed buildings and their setting within a 5km study area has been considered and detailed within ES Volume 3, Appendix 9.1: Archaeology Desk-Based Assessment and Stage 1 Setting Assessment [EN010149/APP/6.3.2] [AS-014]. The DBA has been completed in accordance with the recommended methodology.	
2.4	Setting of Designated Heritage Assets	Historic England have reviewed setting impacts in respect of highly graded designated heritage assets. Historic England are content that the design work to date has drawn back arrays and other visual intrusions associated with the scheme such that harm to any significant degree is designed out (in terms of immediate visual/landscape setting). Likewise, design revisions made to this point have substantively addressed the initial concerns in respect of Conservation Areas and groups of grade ii assets (in terms of immediate visual setting/landscape kinetic impacts on approach etc)	This has been welcomed and agreed.	Agreed

Non-designated heritage assets

Ref.	Description of Matter	Historic England's Comment	Applicant's Response	Status
2.5	Deposit modelling and geology	Historic England advised during pre-application engagement undertaken in June 2023 to produce a deposit model and investigating the reasons for differences in the distribution of geophysical anomalies of likely archaeological origin within the Order Limits.	A geoarchaeological assessment and deposit model has been completed as presented in ES Volume 3, Appendix 9.2: Geoarchaeological Deposit Modelling Report [EN010149/APP/6.3] [APP-098] . This has shown that the distribution of geophysical anomalies of likely archaeological origin within the Order Limits is not due to “masking” of anomalies by deeper deposits. This was agreed at a meeting on 6 February 2025.	Agreed
2.6	Deposit modelling and geology	Historic England had advised on 20 June 2023 on the advantages of undertaking deposit modelling to understand deposition within the Order Limits. Historic England welcome that this has been done within ES Volume 3, Appendix 9.2: Geoarchaeological Deposit Modelling Report [APP-098] . The regular crack structure in the limestone across parts of the Order Limits has been characterised and appears to be broadly separable from anthropogenic ('man-made') features in that area. It should be born in mind however that in pre/early-agricultural landscapes these features may have been visible as surface topography and utilised or incorporated into human activity which may not be separable in geophysical survey.	This has been noted. The trial trenching included trenches targeted on these anomalies and confirmed that they did not include any evidence of human activity (ES Volume 3, Appendix 9.5: Archaeological Trial Trenching Report [EN010149/APP/6.3] [APP-106]). The potential for others of the cracks to contain artefacts or deposits of archaeological interest is noted, however the Applicant considers that further trenching to investigate this potential is disproportionate to the likely impacts of the proposed development.	Agreed

Ref.	Description of Matter	Historic England's Comment	Applicant's Response	Status
2.7	Approach to trial trenching	Historic England has expressed concern over the approach to trial trenching for below-ground remains, noting that areas identified as low potential may not be tested, potentially leading to confirmation bias.. Historic England also raised concerns that the timing and cost pressures could reduce the ability to respond to risks later in the process. Historic England recommends further evaluation trenching during the examination period to better manage risks and avoid delays or costs. Historic England urges continued engagement with local archaeological advisors to target areas of higher risk and improve results through additional investigative techniques. Additionally, Historic England flagged at a meeting on 9 April 2025 that the area of the projected Roman road in Springwell Central may have increased archaeological potential and also raised concerns as to whether there is sufficient flexibility in the cable corridors to allow for avoidance of remains if they are found during trenching for the detailed design. Historic England have requested for further refinement of the mapping in the oWSI that shows the further work required, including exploration of	Trial trenching has been carried out of apparently blank areas – as detailed in the WSI for the pre-submission trenching annexed to ES Volume 3, Appendix 9.5: Archaeological Trial Trenching Report [EN010149/APP/6.3] [APP-106]. The selection of these areas was made to de-risk the Project Substation, BESS and Collector compounds as elements of infrastructure that have less design flexibility than the solar arrays. This approach to de-risking the project is supported by Historic England who would not propose a fixed percentage of trenching across the Order Limits. The trenching has shown very strong correlation with the geophysical survey results and the likelihood of extensive complex remains being present in areas not indicated by the geophysical survey is considered to be low, having regard to the evidence of the other non-intrusive surveys. Further trenching is proposed for the detailed design stage secured by a DCO Requirement. The scope of this is still under discussion, any agreement of scope will be captured in an updated Outline Written	Under Discussion

Ref.	Description of Matter	Historic England's Comment	Applicant's Response	Status
		what labelling would mean in practice. Historic England noted that looking at topography / rising ground and tops in relation to barrows and the roman roads will help to manage the risk of early medieval burial and could help to bring the risk to an acceptable level through work undertaken post-consent. Historic England confirmed during the Issue Specific Hearing 1 that whilst it was desirable to gain the soonest understanding of remains to inform design, they do not identify additional trenching pre-DCO determination as critical to the determination of the application.	Scheme of Investigation (oWSI) [EN010149/APP/7.15] [APP-0148] to be updated during the examination following further engagement with Historic England and Lincolnshire County Council. The area around the projected line of the Roman road within Springwell Central has already been identified as containing geophysical anomalies – the approach to investigating these and mitigating for any impacts is captured in the oWSI [EN010149/APP/7.15] [APP-0148]. Any further trenching that may be carried out will be subject to a detailed Written Scheme of Investigation. The Applicant confirms that the parameters for the cable corridors have been left wide within the Order Limits to allow for this flexibility should the trenching identify remains requiring preservation in situ. Engagement is ongoing with HE and LCC on further assessment process and detail to be included within the oWSI.	
2.8	Air Crash Site(s)	Historic England refer all parties to the Ministry of Defence with whom it is understood the Applicant is already engaged.	Engagement has been sought with the Ministry of Defence and a licence was obtained prior to undertaking the Trial Trenching works in these areas. The oWSI [EN010149/APP/7.15] [APP-0148] includes	Agreed

Ref.	Description of Matter	Historic England's Comment	Applicant's Response	Status
			mitigation of impacts in the area of the World War II crash sites (use of non-intrusive supports for the arrays and an area of pre-commencement excavation for the collector compound). The oWSI [EN010149/APP/7.15] [APP-0148] also notes that a new licence will be required for any excavation within the area of the World War II crashes. Further engagement with the Ministry of Defence has been held (email and telephone on 22 April 2025) regarding licensing for post-consent works. A licence for this will be applied for.	

Signatures

This Statement of Common Ground is agreed upon:

On behalf of Historic England

Name:

Signature:

Date:

On behalf of the Applicant

Name:

Signature:

Date:



springwellsolarfarm.co.uk