

Planning Inspectorate Reference: EN010151

Statement of Common Ground Between the Applicant and Historic England
Document Reference: 8.15
October 2025





Quality information

Prepared by	Checked by	Verified by	Approved by
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Abbreviation	Description	
AC	Alternating Current	
AIS	Air Insulated Switchgear	
AMS	Archaeological Mitigation Strategy	
Applicant	Beacon Fen Energy Park Ltd	
BBC	Boston Borough Council	
BESS	Battery energy storage system	
CCTV	Closed circuit television	
DC	Direct Current	
DCO	Development Consent Order	
EA	Environment Agency	
ES	Environmental Statement	
GIS	Gas Insulated Switchgear	
HE	Historic England	
HOT	Head of Terms	
HV	High Voltage	
IDB	Internal Drainage Board	
LCC	Lincolnshire County Council	
LFR	Lincolnshire Fire and Rescue Service	
LLFA	Local Lead Flood Authority	
Low Carbon	Low Carbon Ltd	
MW	Megawatts	
NGR	National Grid Reference	
NKDC	North Kesteven District Council	
NPSs	National Policy Statements	
NSIP	Nationally Significant Infrastructure Project	
OBSMP	Outline Battery Safety Management Plan	
OCEMP	Outline Construction Environmental Management Plan	
OCTMP	Outline Construction Traffic Management Plan	
ODEMP	Outline Decommissioning Environmental Management Plan	
OLEMP	Outline Landscape and Ecological Management Plan	



PCU Power Conversion Unit PINS Planning Inspectorate PEIR Preliminary Environmental Information Report Proposed The entire development to be constructed and operated within the Site, as set out in Schedule 1 of the draft DCO PRoW Public Right of Way PV Photovoltaic RR Relevant Representation(s) SLR SLR Consulting, formerly Wardell Armstrong (WA) SoCC Statement of Community Consultation SoCG Statement of Common Ground SoS Secretary of State The Site The entire draft Order Limits or red line boundary located approximately 6.5 km northeast of the village of Sleaford and 2.5 km north of Heckington ZTV Zone of Theoretical Visibility	Order	The Beacon Fen Energy Park Order
PEIR Preliminary Environmental Information Report Proposed The entire development to be constructed and operated within the Site, as set out in Schedule 1 of the draft DCO PRoW Public Right of Way PV Photovoltaic RR Relevant Representation(s) SLR SLR Consulting, formerly Wardell Armstrong (WA) SoCC Statement of Community Consultation SoCG Statement of Common Ground SoS Secretary of State The Site The entire draft Order Limits or red line boundary located approximately 6.5 km northeast of the village of Sleaford and 2.5 km north of Heckington	PCU	Power Conversion Unit
Proposed Development Development Site, as set out in Schedule 1 of the draft DCO PRoW Public Right of Way PV Photovoltaic RR Relevant Representation(s) SLR SLR Consulting, formerly Wardell Armstrong (WA) SoCC Statement of Community Consultation SoCG Statement of Common Ground SoS Secretary of State The Site The entire draft Order Limits or red line boundary located approximately 6.5 km north of Heckington	PINS	Planning Inspectorate
Development Site, as set out in Schedule 1 of the draft DCO PRoW Public Right of Way PV Photovoltaic RR Relevant Representation(s) SLR SLR Consulting, formerly Wardell Armstrong (WA) SoCC Statement of Community Consultation SoCG Statement of Common Ground SoS Secretary of State The Site The entire draft Order Limits or red line boundary located approximately 6.5 km north of Heckington	PEIR	Preliminary Environmental Information Report
PROW Public Right of Way PV Photovoltaic RR Relevant Representation(s) SLR SLR Consulting, formerly Wardell Armstrong (WA) SoCC Statement of Community Consultation SoCG Statement of Common Ground SoS Secretary of State The Site The entire draft Order Limits or red line boundary located approximately 6.5 km north east of the village of Sleaford and 2.5 km north of Heckington	Proposed	The entire development to be constructed and operated within the
PV Photovoltaic RR Relevant Representation(s) SLR SLR Consulting, formerly Wardell Armstrong (WA) SoCC Statement of Community Consultation SoCG Statement of Common Ground SoS Secretary of State The Site The entire draft Order Limits or red line boundary located approximately 6.5 km northeast of the village of Sleaford and 2.5 km north of Heckington	Development	Site, as set out in Schedule 1 of the draft DCO
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SoS Secretary of State The Site The entire draft Order Limits or red line boundary located approximately 6.5 km northeast of the village of Sleaford and 2.5 km north of Heckington	SoCC	Statement of Community Consultation
The Site The entire draft Order Limits or red line boundary located approximately 6.5 km northeast of the village of Sleaford and 2.5 km north of Heckington	SoCG	Statement of Common Ground
approximately 6.5 km northeast of the village of Sleaford and 2.5 km north of Heckington	SoS	Secretary of State
7TV Zone of Theoretical Visibility	The Site	approximately 6.5 km northeast of the village of Sleaford and 2.5 km
	ZTV	Zone of Theoretical Visibility

<u>Disclaimer</u>

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Appendix 1 Designated Heritage Assets Embedded Mitigation (Document Ref 8.17)



1. Introduction

1.1 Overview

- 1.1.1 This Statement of Common Ground ('SoCG') with Historic England (Document Ref: 8.15) has been prepared on behalf of Beacon Fen Energy Park Ltd (the 'Applicant'). It relates to the application (the 'Application') for a Development Consent Order ('DCO'), that has been submitted to the Secretary of State (the 'SoS') for the Department for Energy Security and Net Zero, under Section 37 of the Planning Act 2008 (the '2008 Act').
- 1.1.2 The Applicant is seeking development consent for a ground-mounted solar photovoltaic ('PV') electricity generation and battery energy storage system ('BESS'), together with associated grid connection infrastructure (the 'Proposed Development'), at an area sited approximately 6.5 km northeast of the village of Sleaford and 2.5 km north of Heckington (the 'Site'). The Proposed Development would have a generation capacity of approximately 400 megawatts ('MW') of electricity, with a 600MW BESS.
- 1.1.3 The Site corresponds to the entire Order Limits and represents the entire land area required for construction, operation and decommissioning of the Proposed Development. It is made up of the Solar Array Area (comprising the solar PV and BESS infrastructure) the Cable Route Corridor (comprising an electrical connection from the Solar Array Area to the Bicker Fen National Grid 400kV substation) and the Bespoke Access Corridor (for a bespoke access from the A17 to the Solar Array Area). This is termed the Bespoke Access Road.
- 1.1.4 The Proposed Development falls within the definition of a 'Nationally Significant Infrastructure Project' ('NSIP') under Section 14(1)(a) and Sections 15(1) and (2) of the 2008 Act, as it is an onshore generating station in England that would have a generating capacity greater than 50MW electrical output. As such, a DCO application is required to authorise the Proposed Development in accordance with Section 31 of the 2008 Act.
- 1.1.5 The DCO, if made by the SoS, would be known as 'The Beacon Fen Energy Park Order 202[]' (the 'Order').

1.2 The Applicant

1.2.1 The Applicant is a subsidiary of Low Carbon Ltd ('Low Carbon'). Low Carbon is a privately-owned global renewable energy company.

1.3 The Site

1.3.1 The Site represents the entire Order Limits and is located east of Sleaford in Lincolnshire. It extends to approximately 758ha and comprises of three functional areas: the Solar Array Area, the Cable Route Corridor and the Bespoke Access Corridor.

1



Solar Array Area

- 1.3.2 The Solar Array Area is approximately 529ha in size and located to the north of Heckington, centred at the National Grid Reference ('NGR') 514682 347825. The Solar Array Area is located wholly within the administrative areas of North Kesteven District Council ('NKDC') and Lincolnshire County Council ('LCC').
- 1.3.3 The Solar Array Area predominantly comprises agricultural land in arable use, divided by ditches with sparse tree cover that is limited to small woodland blocks and scattered hedgerow trees. A small reservoir is located in the southwest of the Solar Array Area.
- 1.3.4 The Solar Array Area is bound to the south, west and north by local highways, and bound to the east by the Car Dyke. Public Right of Way ('PRoW') Ewer/12/1 extends across the north-eastern corner of the Site, close to the northern Site boundary. There are no other PRoW within the Solar Array Area.
- 1.3.5 Villages in proximity to the Solar Array Area include:
 - Howell immediately to the south-west, with Heckington c. 1.7km beyond;
 - Ewerby Thorpe immediately to the west, with Ewerby c. 1.1km beyond;
 - Anwick c. 2.7km to the north-west;
 - North Kyme c. 2.4km to the north; and
 - South Kyme c. 1.5km to the east.

Cable Route Corridor

- 1.3.6 The Cable Route Corridor is approximately 183 ha in size and extends c. 13km south-east from the Solar Array Area to Bicker Fen substation, at NGR TF 19684 38599. The Cable Route Corridor is located wholly within the administrative area of LCC. The majority of the Cable Route Corridor is located within the administrative area of NKDC, however the southern section is located within BBC's administrative area.
- 1.3.7 Land use within the Cable Route Corridor is predominantly agricultural. A number of local highways cross the Cable Route Corridor, and the A17 crosses east to west within the north-west section of the Corridor. The railway linking Heckington west to Sleaford and east to Swineshead intersects the mid-section of the Corridor. There are a number of PRoW within the Cable Route Corridor, including one alongside the South Forty Foot Drain which also crosses the Cable Route Corridor.

Bespoke Access Corridor

- 1.3.8 The Bespoke Access Corridor is approximately 45.4 ha in size comprising predominantly agricultural land and extends approximately 3km south-west from the Solar Array Area to the A17. The Bespoke Access Corridor is located wholly within the administrative areas of LCC and NKDC.
- 1.3.9 The Bespoke Access Corridor has been refined during the pre-application stage, informed by results from environmental surveys and consultation feedback.
- 1.3.10 Asgarby Road and Heckington Road crosses the Bespoke Access Corridor and there are four PRoW located within the route.



1.4 The Proposed Development

1.4.1 The main components of the Proposed Development are summarised below and defined in Schedule 1 of the **Draft DCO** (**APP-039**).

Solar Array Area

- 1.4.2 The Solar Array Area consists of solar PV panels and modular ground-mounting structures. The height of the panels considered will be up to 3.9m above ground level in fields to the east and 3.5m above ground level in fields to the west, south and an isolated field in the north. The proposal is for a fixed (i.e., static) panel orientation, facing due south which is commonly seen on existing UK solar farms, and angled 10° to 45° from horizontal. Supporting infrastructure includes inverters, combiner boxes, transformers and switchgear converting the Direct Current ('DC') to Alternating Current ('AC') and stepping up the voltage so it can be exported to the National Grid. An inverter, transformer and switchgear comprised together is termed a Power Conversion Unit (PCU).
- 1.4.3 A 600MW BESS adjacent to the Onsite Substation is included in the Proposed Development within the Solar Array Area. This will allow the electricity generated by the panels to be stored on site at times when grid demand is low, then exported at times of higher demand. The BESS containers and switch rooms are anticipated to be up to 8m x 3m in size, with a height of up to 4.5m.
- 1.4.4 Low voltage onsite electrical cabling is required to connect the PV modules and BESS to the inverters, and the inverters to the onsite transformers. Higher voltage cables are required between the transformers and the switchgear and from switchgear to the substation.
- 1.4.5 A new Onsite Substation is proposed and would have up to four High Voltage (HV) transformers with a maximum footprint of no more than 40,000m2 (e.g. 250m x 160m (or 200m x 200m)) and a height of up to 13m). The Onsite Substation will include a 33kV switchroom, control and storage buildings that would house office space and welfare facilities, as well as operational monitoring and maintenance equipment and equipment for reactive compensation and/or harmonic filtering. The design control building and office/welfare will be defined as part of detailed design.
- 1.4.6 The perimeter fence would likely comprise standard post and wire, deer fencing up to 3m tall around the Solar Array Area. Security fencing, up to 3.4m will be installed around the substation compounds and, possibly, other infrastructure / compounds. Acoustic fencing, up to 4m tall, may be required around the BESS, subject to the detailed design and layout.
- 1.4.7 Mounted internal-facing closed circuit television (CCTV) systems will likely be deployed around the perimeter of the operational areas of the Site; anticipated to be 5m high. The CCTV cameras would have fixed view sheds and will be aligned to face along the fence. Motion detection security lighting will be used around the electrical infrastructure and potentially at other pieces of critical infrastructure.
- 1.4.8 During construction, temporary construction compounds will be required, as well as temporary roadways, to enable access to all the land within the Site.



Localised earthworks to form suitable development platform for the substation and BESS will also be required.

- 1.4.9 There will be one primary access on the western edge of the Solar Array Area and a secondary access to the north, both of which will allow larger vehicles (including first responder vehicles) to access the BESS and Onsite Substation. Tertiary operational access primarily for smaller vehicles is provided to the north west and south.
- 1.4.10 PRoW Ewer/12/1 is being extended in a south and westerly direction as a permissive path terminating in the vicinity of Ewerby Thorpe, and will be in place for the operational duration of the Proposed Development. The exact route of the permissive path will be determined via the discharge of a requirement in the **Draft DCO (APP-039)**, but is anticipated to run in a south easterly direction along Car Dyke then heading south west on the north side of Hodge Dike. An undetermined number of footbridges (unlikely to be more than eight in number) to cross existing watercourses will be required and will require the usual water course crossing agreements to be sought with the relevant Internal Drainage Board (IDB) in parallel with the discharge of the requirement.

Cable Route

- 1.4.11 The Cable Route running between the Solar Array Area and the Bicker Fen 400kV Substation will be constructed through trenched methods and, where required, trenchless methods.
- 1.4.12 During construction, temporary construction compounds will be required approximately every 1-3 km, as well as temporary roadways, to enable access to all land. It is anticipated that there will be 6 main compounds that are distributed at approximately equal distances along the cable route to facilitate proper construction management. Smaller temporary compounds may also be located anywhere within the final working area.
- 1.4.13 Vegetation and hedgerows lost during construction of the Cable Route will be re-instated where possible subject to easement restrictions.

Bespoke Access Road

- 1.4.14 A dedicated access from the A17 to the Solar Array Area is required. It will be constructed in advance of material construction commencing on the Solar Array Area and will facilitate construction in that area. During construction, temporary construction compounds will be required which may be anywhere along the route.
- 1.4.15 The Bespoke Access Road will likely be the last component of the Proposed Development to be removed as it will be used to facilitate decommissioning of the Solar Array Area. Whilst it is assumed for the **Environmental Statement** ('ES') (APP-050 to APP-285) that the road will be removed (unless otherwise stated in the relevant chapter), it is possible that engagement with the landowners at that time will establish a preference for it to be retained. Optionality has been deliberately retained in the Application to facilitate such a scenario.
- 1.4.16 There will be no permanent lighting installed and access will be controlled through gates at all stages.



1.4.17 Vegetation and hedgerows lost during construction of the Bespoke Access Road will be re-instated following decommissioning subject to the road being removed.

In any or all of the above areas

- 1.4.18 Along with the above, in any or all of the three areas, the Proposed Development will include the following (subject to certain requirements):
 - Access tracks of between 3.5m to 9m width for construction access and routine maintenance when operational. Access tracks located adjacent to drainage ditches will incorporate the necessary ecological, Environment Agency (EA) and/or Internal Drainage Board (IDB) buffers where required;
 - Boundary treatments, means of enclosure, security measures, and paths;
 - Landscaping and reinstatement planting and Biodiversity Net Gain related habitats;
 - Flood resilience measures including swales and storm water attenuation, and works to existing irrigation systems;
 - Utility diversions;
 - Bunds, embankments, protective works to buildings, maintenance and improvement of streets; and
 - Construction related (and decommissioning related) work sites.

Bicker Fen Substation Works

- 1.4.19 The extension of Bicker Fen substation will include a new generation bay, a new generation bay control room and a perimeter access road. A new generation bay will also include electrical equipment required for connection to the transmission system.
- 1.4.20 National Grid Electricity Transmission plc ('NGET') have requested that there be optionality within the design of the extension to Bicker Fen substation. The two design options that have been assessed in the **ES (APP-050 to APP-285)** and included in the Application are: Air Insulated Switchgear ('AIS') and Gas Insulated Switchgear ('GIS').

Draft Development Consent Order

- 1.4.21 The Proposed Development is described in detail in Schedule 1 to **the Draft DCO (APP-039)**, and the areas in which each component (the 'Work Numbers') may be constructed are shown on the **Works Plans (APP-010)**.
- 1.4.22 The Proposed Development is split into 10 Work Numbers as follows:
 - Work No. 1 a ground mounted solar photovoltaic generating station with a gross electrical output capacity of over 50 megawatts;
 - Work No. 2 a battery energy storage system compound and associated works (including fire safety infrastructure);
 - Work No. 3 development of an onsite substation and associated works:
 - Work No. 4 works in connection with electrical cabling and associated compounds;
 - Work No. 5 works to the existing Bicker Fen National Grid substation to create a new generation bay and substation extension;



- Work No. 6 various ancillary works relating to the Solar Array Area, including cabling, fencing, security features, access tracks, watercourse crossings and landscaping and biodiversity mitigation measures;
- Work No. 7 construction and decommissioning compounds in connection with Work Nos. 1, 2 and 3;
- Work No. 8 works to create the Bespoke Access Road;
- Work No. 9 areas of habitat management; and
- Work No. 10 works to facilitate access to Work Nos. 1 to 9.
- 1.4.23 In addition, Schedule 1 to the **Draft DCO (APP-039)** lists other associated works (referred to as "further associated development") which may be carried out in connection with the construction of Work Nos. 1 to 10.

1.5 The Development Consent Order Process

- 1.5.1 As a NSIP, the Applicant is required to seek a DCO to obtain planning and other powers to construct, operate and maintain the generating station, in accordance with Section 31 of the 2008 Act. Sections 42 to 48 of the 2008 Act govern the consultation that an applicant must carry out before submitting an application for a DCO and Section 37 of the 2008 Act governs the form, content and accompanying documents that are required as part of a DCO application.
- 1.5.2 An application for development consent for the Proposed Development has been submitted to and accepted for examination by the Planning Inspectorate ('PINS') acting on behalf of the SoS. PINS is now examining the Application and will make a recommendation to the SoS, who will then decide whether or not to make (grant) the DCO.

1.6 Purpose of this Document

- 1.6.1 This document is intended to summarise clearly the agreements reached between the Applicant and the parties on matters relevant to the examination of the Application, in order to assist the Examining Authority to understand progress of negotiations between the parties. It has been prepared having regard to the guidance in *Planning Act 2008: Pre-examination stage for Nationally Significant Infrastructure Projects* and *Planning Act 2008: Examination stage for Nationally Significant Infrastructure Projects* (Ministry of Housing, Communities and Local Government and Department for Levelling Up, Housing and Communities, April 2024).
- 1.6.2 It is intended that the SoCG will provide information for the examination process, facilitating a smooth and efficient examination and managing the amount of material that needs to be submitted.

1.7 Role of Key Stakeholders

- 1.7.1 This SoCG refers to communications and correspondence with Historic England. The role of Historic England and how it relates to the Application is summarised, below.
- 1.7.2 Historic England is a statutory consultee in the planning system in relation to the historic environment and handles applications for Scheduled Monument



consent on behalf of the Secretary of State for Culture, Media and Sport. It also administers the Secretary of State's licensing functions in relation to access to designated wrecks (Section 1 Protection of Wrecks Act 1973). Historic England is a Non-Departmental Public Body sponsored by the Department for Culture, Media and Sport (DCMS). It works in partnership with central government departments, local authorities, voluntary bodies and the private sector. Historic England is the lead body for the heritage sector and the government's principal adviser for the historic environment in England

- 1.7.3 Historic England is a prescribed consultee in respect of all DCO applications that are likely to affect land in England. Annex E of Advice Note 11 'Working with Public Bodies' produced by PINS sets out in detail the role of Historic England in the DCO process, including the level of input and agreement be expected from Historic England. The Applicant has consulted Historic England throughout development of the Proposed Development.
- 1.7.4 Given their scale, most onshore and offshore projects within the scope of the NSIP regime could have some impact on the historic environment. Historic England is a statutory consultee on all proposed applications for NSIPs. The roles of Historic England during the various stages under the 2008 Act are set out in more detail below.
- 1.7.5 Historic England role covers various matters, this includes all aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora. It has general duties under Section 33 of the 1983 Act to:
 - secure the preservation of ancient monuments and historic buildings situated in England;
 - promote the preservation and enhancement of the character and appearance of conservation areas situated in England; and
 - promote the public's enjoyment of, and advance their knowledge of, ancient monuments (any structure, work, site (including the remains of any vehicle, vessel, aircraft or other movable structure) garden or area which Historic England identifies as of historic, architectural, traditional, artistic or archaeological interest), and historic buildings situated in England and their preservation,
- 1.7.6 It can be taken that any matters not specifically referred to in the 'Matters Agreed during Pre-Examination Stage' or 'Matters not yet agreed during Pre-Examination Stage' sections of this SoCG are not of material interest or relevance to Historic England representations and have, therefore, not been considered in this SoCG.
- 1.7.7 This SoCG has been produced to confirm to the Examining Authority where agreement has been reached between the parties, where agreement has not been reached (and that is the parties' final position) and where discussions are still ongoing.

1.8 Status of this Version

¹ Available online at: https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-advice-on-working-with-public-bodies-in-the-infrastructure-planning-process-annex-d-environment-ag.



- 1.8.1 This SoCG is prepared in collaboration with Historic England and represents the final agreed version of the SoCG. This SoCG has been produced to confirm to the Examining Authority where agreement has been reached between the parties.
- 1.8.2 It can be taken that any matters not specifically referred to in the 'Matters Agreed during Pre-Examination Stage' (Section 3) or Matters Agreed during Examination Stage' (Section 4) of this SoCG are not of material interest or relevance to Historic England representations and have, therefore, not been considered in this SoCG.
- 1.8.3 Section 2 of this document summarises the consultation undertaken with Historic England to date and Section 3 sets out the matters agreed between the parties during the pre-examination stage in respect of the Application.



2. Summary of Consultation

2.1.1 Table 2.1, below, contains a record of pertinent correspondence between the Applicant and Historic England (HE).

Table 2.1 - Summary of Correspondence

DATE	FORM OF CORRESPOND ENCE	NOTES
26/05/2023	Scoping Opinion The Planning Inspectorate	HE queried the methodology for assessing the value of heritage assets as set out in Table 6.3 of Appendix 1.1 Scoping Report (APP-071) , specifically the classification of grade II listed buildings, grade II registered parks and gardens and conservation areas as being of medium value and the classification of locally listed buildings at low value. HE queried the methodology for assessing the magnitude of impact as set out in Table 6.4 of the Scoping Report , specifically the bar for substantial harm being too restrictive.
18/08/2023	Email from Applicant to HE	 Email sent to HE from the Applicant in response to the Appendix 1.2 Scoping Opinion (APP-072) setting out that the methodology summarised in Tables 6.3 and 6.4 of the Scoping Report was derived from guidance set out in the following: Guidance on Heritage Impact Assessments for Cultural World Heritage Properties; ICOMOS (2011); Principles of Cultural Heritage Impact Assessment in the UK; IEMA, IHBC and ClfA (2021); NPPF (2021); The Setting of Heritage Assets; Historic England (2017); and Design Manual for Roads and Bridges, LA 104 Environmental Assessment and Monitoring (Highways England, 2020). No response was received from HE.
18/08/2023	Section 42 Response from HE	Comments on PEIR (Document Reference: ST19595-REP-002). In reference to potential significant impacts identified at PEIR to designated heritage assets through setting change, HE encourages mitigation through design. In reference to assessing the impact to archaeological remains HE challenge the classification of Car Dyke at medium value. Separately they request the consideration of the possible remains of the former Waithe Pumping Engine and a possible windmill.



DATE	FORM OF CORRESPOND ENCE	NOTES
02/07/2025	Relevant Representation from HE	Historic England's comments on the submitted Chapter 8 Cultural Heritage (APP-059) regarding archaeological approach and strategy and comments regarding the indirect impact to above ground designated heritage assets. HE reiterates comments sent at the S42 response but additionally reference the assessment of effects to buried farmhouses. HE specifies no comment on the draft DCO wording of requirements 10 and 11. HE acknowledges the undertaking of presubmission evaluation work comprising geophysical survey and trial trenching and reference support for Archaeological Mitigation Strategy (Appendix 8.11 Archaeology Mitigation Strategy (APP-153)).
29/08/2025	Email from Applicant to HE	Email from the Applicant to Historic England regarding a meeting to discuss the heritage and archaeological progress and potential issues.
26/09/25	Teams Meeting with Historic England	SLRThe Applicant held a Teams meeting with Historic England to discuss the points that had previously been raised and addressed within the ES. Additional points were also raised in relation to potential impacts to below ground heritage assets should there be a change in downstream water flow as a result of cable crossings and winter views to the following aboveground heritage assets: • Kyme Tower Grade I Listed Building (NHLE 1204786); • Church of St Mary and All Saints, Grade II* Listed Building (NHLE 1061749); • Boughton House, a Grade II Listed Building (NHLE 1061835); • Church of St Oswald, Howell, a Grade II* Listed Building (NHLE 1061833); • Church of St Andrew, Asgarby, Grade I Listed Building (NHLE 1061832); • Asgarby Hall, Grade II Listed Building (NHLE 1168367); and • Howell Hall, Grade II Listed Buildings (NHLE 1168460). These were discussed during the meeting and, overall, Historic England were happy with what was said. The Applicant agreed to provide additional information to support the points covered.



DATE	FORM OF CORRESPOND ENCE	NOTES
24/10/25	Email from the Applicant to Historic England	As agreed during the meeting on the 26/09/25, the Applicant provided Historic England with a Technical Note (see Appendix 1 Designated Heritage Assets Embedded Mitigation (Document Ref 8.17) of this SoCG) further explaining the assessment findings reported within Chapter 8 Cultural Heritage (APP-059) in respect of the following heritage assets: • Kyme Tower Grade I Listed Building (NHLE 1204786); • Church of St Mary and All Saints, Grade II* Listed Building (NHLE 1061749); • Boughton House, a Grade II Listed Building (NHLE 1061835); • Church of St Oswald, Howell, a Grade II* Listed Building (NHLE 1061833); • Church of St Andrew, Asgarby, Grade I Listed Building (NHLE 1061832); • Asgarby Hall, Grade II Listed Building (NHLE 1168367); and • Howell Hall, Grade II Listed Buildings (NHLE 1168460).
31/10/25	Teams Meeting with Historic England	Meeting to discuss Appendix 1 Designated Heritage Assets Embedded Mitigation (Document Ref 8.17) and resolve the final outstanding matters.



3. Matters Agreed during Pre-Examination Stage

- 3.1.1 Table 3.1, below, contains a list of 'matters agreed' at the date of submission of the document to Historic England, along with a concise commentary of what each item refers to and how it came to be agreed between the two parties.
- 3.1.2 In addition, Annex G of the Rule 6 Letter from PINS explicitly states that the SoCG with Historic England should include the following:
 - 3.1.3 Effects on designated heritage assets including listed buildings, scheduled monuments, Conservation Areas and Registered Parks and Gardens.
 - 3.1.4 Effects on archaeological remains and the appropriateness of any preservation measures proposed at construction and decommissioning stages, including preservation by design and by record.
- 3.1.5 These points, as well as the other key matters, have been addressed in the table(s), below.

Table 3.1 – List of Matters agreed during Pre-Examination Stage

MATTER	COMMENTARY
Potential Archaeological Impacts from the Proposed Development. Effects on archaeological remains and the appropriateness of any preservation measures proposed at construction and decommissioning stages.	Historic England provided a response to the archaeological assessment and evaluative approach to archaeology across Beacon Fen within the Relevant Representations (RR-08). In their relevant representation, HE acknowledges the completion of pre-submission geophysical surveys followed by targeted trenching including blank areas in both the Solar Array Area and Bespoke Access Corridor. HE has acknowledged Appendix 8.11 Archaeology Mitigation Strategy (APP-153) and are broadly supportive of its approach. HE has stated that LCC are satisfied that the work undertaken to date has been completed to the required standards and that this approach has provided an understanding of the archaeological potential, significance and likely impact arising from the proposed development.



4. Matters Agreed during Examination Stage

4.1.1 Table 4.1, below, contains a list of 'matters agreed' correct after discussions with historic England, along with a concise commentary of what the item refers to and how it came to be agreed between the two parties. Table 4.1 confirms agreement on the key matters stated in Annex G of the Rule 6.

Table 4.1 – List of Matters Agreed during Examination Stage

MATTER	COMMENTARY
Effects on Designated Heritage Assets including Listed Buildings and Scheduled Monuments	In their relevant representation (RR-08), HE referred to potential significant impacts to designated assets through setting change, specifically South Kyme Tower (listed grade I NHLE 1204786 and Scheduled Monument NHLE 1008317), Church of St Mary and All Saints (listed grade II* NHLE 1061749) and the Church of St Oswald, Howell, (listed grade II* NHLE 1061833). HE referenced mitigation by design to address these impacts. The Applicant asserted that the impacts referenced by HE were identified at the 'significant' level at PEIR, only. The Applicant directed HE to the subsequent assessments carried out that establish that 'no significant impacts' are predicted. The assessments and findings are fully detailed within both Chapter 8 Cultural Heritage (APP-059) of the ES and the accompanying Appendix 8.2 Heritage Statement (APP-118), with a summary of all impacts included within Table 8.11: Cultural Heritage - Summary Assessment Matrix of Chapter 8 Cultural Heritage (APP-059). Additional clarification of the assessment findings was provided to HE within Appendix 1 Designated Heritage Assets Embedded Mitigation (Document Ref 8.17) on the 24 th October 2025, with a follow-up meeting with HE on Friday 31 st October to discuss.
	Within Table 8.11: Cultural Heritage - Summary Assessment Matrix of Chapter 8 Cultural Heritage (APP-059), it is recorded that, for both the South Kyme Tower (listed grade I NHLE 1204786 and Scheduled Monument NHLE 1008317) and the Church of St Mary and All Saints (listed grade II* NHLE 1061749), there would be a long-term, but temporary (reversible) slight adverse impact to the setting of each asset during the operational phase that would be Not Significant. For the Church of St Oswald, Howell (listed grade II* NHLE 1061833), there would be a short-term, temporary (reversible) slight adverse impact to the setting of the asset during the construction and decommissioning phase that would be Not Significant, as well as a long-term, temporary (reversible) slight adverse impact to the setting of the asset during the

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operational phase that would also be Not Significant. The Church of St Andrew, Asgarby, a Grade I Listed Building (NHLE 1061832), would be subject to a moderate adverse effect (significant) during the construction phase, only.

Following the provision of **Appendix 1 Designated Heritage Assets Embedded Mitigation (Document Ref 8.17)** and subsequent consultation with HE (dated 31/10/25), HE has confirmed that they are satisfied with the findings of the assessment. This matter is, therefore, resolved and listed as agreed.



Signed: Hayley James

On behalf of: Historic England

Date: 31st October 2025

Signed: Jessica Gough

On behalf of: Beacon Fen Energy Park Ltd

Date: 31st October 2025



Appendix 1 Designated Heritage Assets Embedded Mitigation (Document Ref 8.17)

The following was issued to Historic England (HE) on the 24th October 2025 to support this Statement of common Ground (SoCG).

Heritage Assets: Embedded Mitigation

Designa Value

Asset

Asset	tion	value	(Residual)	Embedded Mitigation Measures
Kyme Tower a Grade I Listed Building (NHLE 1204786);	Grade I	High	Slight adverse (not significant). Kyme Tower, a Grade I Listed building (NHLE 1204786), is a heritage asset of the highest designation and has been considered as such. Therefore, the resultant impact would be a slight adverse effect on significance, from the setting of Kyme Tower. The embedded mitigation proposed (see Appendix 2.3 Embedded Mitigation (APP-076)) comprises that shown within the next column.	 The intervening distance between the asset and the Solar Array Area is approximately 1.25km. Provision of screening from existing hedge and tree line along Midfodder Dike. The Bespoke Access Corridor, where possible, will follow existing field boundaries in keeping with the historic landscape field pattern. Height restrictions are set (perimeter fencing ≤ 3m; pole mounted CCTV ≤ 5m; substation fencing ≤ 3.4m; acoustic fencing (if required) ≤4 m; and substation ≤ 13m) to reduce visual impact and preserve rural character. Undergrounding the 400 kV Cable Route will retain the visual character/form of landscape to prevent harm to heritage assets through lack of permanent visual change. Upon decommissioning, the cabling will remain in situ and avoid any temporary setting effects. Motion detection security lighting will be used along with infrared lighting provided by the CCTV security system. Lighting at the BESS and Onsite Substation will be passive infrared (PIR) operated, calibrated to detect vehicles and personnel. All visible lighting will be 50W, installed at a maximum height of 4m with downward light fittings to

Significance of effect | Embedded Mitigation Measures

Site Photos



View of Kyme Tower looking southwest, the tree lined boundary by the River Slea in the background. This was taken north of the through track way immediately north of Kyme Tower. Photo taken September 2025.



View looking east towards Kyme Tower from west of the settlement boundary showing the thick tree lined boundary skirting the River Slea providing screening and bounding its immediate setting. This view was strategy will help to maintain the current light levels and preserve the current night-time ambiance around the asset.

A Public Right of Way (PRoW) will be reconnected towards South Kyme, reinstating a historic route via the introduction of a new permissive path throughout the Solar Array Area.

prevent light spillage. This lighting taken from the through track way west of Kyme Tower outside the settlement and river boundary. Photo taken September 2025.



View looking west from the bridge crossing the River Slea showing the line of Midfodder Dike in the distance which would provide screening for the Solar Array Area beyond, approx. 1.25km in distance. Kyme Tower is approx. 40m behind this viewpoint, where the photo was taken. This view was taken from the track way west of Kyme Tower with Kyme Tower to the rear of the view. Photo taken early September 2025.



A view looking from the southwest corner of St Mary's

Church of St Mary and All Saints, a Grade II* Listed Building (NHLE 1061749);	Grade II* listed building	High	Slight adverse (not significant) The assessment of slight adverse effect is appropriate through the introduction of change to the wider setting of the designated heritage assets from the Proposed	the asset and the Solar Array Area is approximately 1.25km. Provision of screening from the existing hedge and tree line along Midfodder Dike to the east and north. Height restrictions are set (perimeter fencing ≤ 3m; pole mounted CCTV ≤ 5m; substation fencing ≤ 3.4m; acoustic fencing (if required) ≤ 4 m; and substation ≤ 13m) to reduce	and All Saints church towards the Solar Array Area beyond Midfodder Dike. The Midfodder Dike is the further boundary in the distant view. Photo taken in March 2023. A view of Kyme Tower looking southwest from the southern boundary of the church, this view shows the late winter tree foliage which still precludes visibility from the South Kyme heritage cluster towards the Proposed Development. The photo was taken in March 2023.
			Development	visual impact and Underground cabling of the 400 kV cable will retain the visual character/form of the	

landscape to prevent harm to heritage assets through lack of permanent visual change. Upon decommissioning, the cabling will remain in place to avoid any temporary setting effects.

• Motion detection security lighting will be used along with infrared lighting provided by the CCTV security system. Lighting at the BESS and Onsite Substation will be passive infrared (PIR) operated, calibrated to detect vehicles and personnel. All visible lighting will be 50W, installed at a maximum height of 4m with downward light fittings to prevent light spillage. This lighting strategy will help to maintain the current light levels and preserve the current night-time ambiance around the asset.



View looking north towards the Church of St Mary's All Saints. This view was taken within the church graveyard southeast of the church porch entrance. Photo taken September 2025.



A view looking west from the churchyard towards the Proposed Development, in the foreground is tree plantation and beyond the boundary of the River Slea. Very minor intervisibility in the form of a glimpsed view of the Proposed Development which is located beyond the distant tree line in the background of this photo approx. 1.25km distant. This view was taken from the south boundary of the Church of St Mary's All Saints.

This view was taken from the western churchyard boundary. Photo taken 2025.



The view looking south towards Kyme Tower shows the enclosed nature of the settlement. This view was taken from the southwest corner of St Mary and All Saints Church. Photo taken September 2025.



A view looking southwest towards the Proposed Development showing the intervening landscape and distance which is approx. 1.25km from the Midfodder Dike boundary. There is no intervisibility from the church towards the Proposed Development due to the intervening distance and landscape. This view was

taken from the southern boundary of the Church of St Mary's All Saints. Photo taken September 2025. A view looking southwest towards the Proposed Development. This shows the intervening landscape and distance which is approx. 1.25km from the Midfodder Dike boundary. No intervisibility considering seasonal variation because the Proposed Development is located beyond the tree line, including Midfodder Dike. This view was taken from the southern boundary between the Church of St Mary's All Saints and Kyme Tower. Photo taken March 2023. Slight adverse **Boughton** Grade II Medium The distance (approximately 1.3km (not ● House, a significant) between Boughton House and the Grade II Solar Array Area), and the intervening Listed The assessment of landscape of fields and hedge lines Building slight adverse effect is preclude intervisibility and would (NHLE appropriate through result in (slight adverse) less than 1061835); the introduction of substantial harm. change to the wider • A distance of 0.6km consisting of of the setting existing field boundaries will provide designated heritage screening between Boughton House assets from and the Bespoke Access Corridor Proposed (within which the Bespoke Access Development Road will be situated. The Bespoke Access Road, where A view looking toward Boughton House from the possible, will follow existing field northwest showing the enclosed nature of the

- boundaries in keeping with the historic landscape field pattern.
- Height restrictions are set (perimeter fencing ≤ 3m; pole mounted CCTV ≤ 5m; substation fencing ≤ 3.4m; acoustic fencing (if required) ≤ 4 m; and substation ≤ 13m) to reduce visual impact and preserve rural character.
- Motion detection security lighting will be used along with infrared lighting provided by the CCTV security system. Lighting at the BESS and Onsite Substation will be passive infrared (PIR) operated, calibrated to detect vehicles and personnel. All visible lighting will be 50W, installed at a maximum height of 4m with downward light fittings to prevent light spillage. This lighting strategy will help to maintain the current light levels and preserve the current night-time ambiance around the asset.
- In this case, the heritage asset (Boughton House) is located at a distance of approximately 850m from the Bespoke Access Corridor with an intervening landscape o (trees and hedgerows) that precludes intervisibility.

farmstead. This view was taken from the northwest of Boughton House. Photo taken September 2025.



A view looking at Boughton House from the north looking towards the access lane and showing the enclosed nature of the farmstead. This view was taken near the entrance gate to the house from the north. Photo taken September 2025.



A view from the north of the house looking towards the Bespoke Access Road. The tower of Asgarby Church can be seen in the distance and further beyond the church is the location of the Bespoke Access Road. No intervisibility due to distance and a slight rise then dip

in the landscape. This view was taken near the entrance gate to the house from the north looking southwest. Photo taken September 2025. A view from St Andrew's Church, Asgarby looking towards Boughton House. The land rises slightly towards the east, providing a ridge wherein views of Boughton House are not visible. Therefore, there is no intervisibility towards the Bespoke Access Road which lies further behind, to the west of the church. This view was taken just within the east boundary wall of St Andrew's church. Photo taken September 2025. High Church of Grade II* A Solar PV Exclusion Zone has been Slight adverse (not St Oswald. created within the Site to increase Howell, a significant) separation between the Solar Array Grade II* Area and the Church of St Oswald. Listed The assessment of Height restrictions are set (perimeter Building slight adverse effect is fencing ≤ 3m; pole mounted CCTV ≤ (NHLE appropriate through 5m; substation fencing \leq 3.4m; 1061833); the introduction of acoustic fencing (if required) ≤ 4m; change to the wider and substation ≤ 13m) to reduce setting of the visual impact and preserve rural designated heritage character. assets from the Underground cabling of the 400 kV Proposed will cable retain the visual Development character/form of the landscape to

- prevent harm to heritage assets through lack of permanent visual change. Upon decommissioning of the Solar Array Area, the cabling will remain in place to avoid any temporary setting effects.
- Motion detection security lighting will be used along with infrared lighting provided by the CCTV security system. Lighting at the BESS and Onsite Substation will be passive infrared (PIR) operated, calibrated to detect vehicles and personnel. All visible lighting will be 50W, installed at a maximum height of 4m with downward light fittings to prevent light spillage. This lighting strategy will help to maintain the current light levels and preserve the current night-time ambiance around the asset.
- The Solar PV Exclusion Zone will consist of lowland meadow and improved hedgerows. Its creation, situated between the Solar Array Area boundary and north of Howell Fen Drove, with enhanced infilling of existing boundaries immediately south of the Solar Array Area north of Howell Fen Road, will ensure that there is no intervisibility between the Church of St. Oswald's, the Old Rectory, Howell Hall, and the Proposed Development.

A view looking north at St Oswald's Church, Howell showing the enclosed nature of the settlement, it is surrounded especially to the north and east by thick tree screening and intervening buildings. This view was taken from the grassed area immediately south of St Oswald's church. Photo taken in September 2025.



A view towards the church from the road looking east showing the thickness of the screening. This view was taken from Heckington Road east of the boundary wall bounding the Old Rectory and St Oswald's church. Photo taken September 2025.



A late winter view looking north towards the Old Rectory and St Oswald's church. Although there is no foliage on the trees there remains adequate screening from the density of trees and hedges that form the boundaries. Photo taken March 2023. A view towards the church from the north, viewpoint located south from the Solar Array Area. No intervisibility to or from the Church of St Oswald due to dense tree screening and intervening buildings. This view was taken from the east side of the road north of Howell. Photo taken September 2025. Church of High Grade I Using the existing field boundary St Andrew. Construction: between the Church of St Andrew Asgarby, a Moderate adverse and the Proposed Development as Grade I (significant) screening. Listed • The Bespoke Access Corridor will be Operation and Building located approximately 150m north of (NHLE Decommissioning: the Church at its closest point and 1061832) Slight adverse will, where possible, follow existing (not significant) field boundaries to remain in keeping with the historic landscape field During the pattern.

• Height restrictions are set (perimeter

fencing ≤ 3m; pole mounted CCTV ≤

5m; substation fencing \leq 3.4m;

construction phase an

assessment of

moderate adverse

effect, which is short term only. Following construction, an assessment of slight adverse effect is appropriate through the introduction of change to the wider setting of the designated heritage assets from the Proposed Development.

- acoustic fencing (if required) $\leq 4m$; and substation $\leq 13m$) to reduce visual impact and preserve rural character.
- Undergrounding the 400 kV Cable Route will retain the visual character/form of landscape to prevent harm to heritage assets through lack of permanent visual change. Upon decommissioning, the cabling will remain in situ and avoid any temporary setting effects.
- will be used along with infrared lighting provided by the CCTV security system. Lighting at the BESS and Onsite Substation will be passive infrared (PIR) operated, calibrated to detect vehicles and personnel. All visible lighting will be 50W, installed at a maximum height of 4m with downward light fittings to prevent light spillage. This lighting strategy will help to maintain the current light levels and preserve the current night-time ambiance around the asset.

A view looking toward Asgarby church which was taken from the road looking west. In the background beyond the graveyard, in the distance, is the boundary which would provide screening for the Bespoke Access Road. Photo taken September 2025.



A view from St Andrew's church, Asgarby looking southwest towards the Bespoke Access Road. It shows that the slight rise in the landscape and the Dyke boundary would provide limited intervisibility during the Winter early Spring months. With embedded mitigation, enhancement of existing boundaries, this would reduce the impact to slight adverse effect during the operational phase. The view was taken near the west boundary of the graveyard. Photo taken in March 2023.



A view looking southwest towards where the Bespoke Access Road will come off the A17. This will be located beyond the hedge tree boundary viewed in the distance (approximately 270m from the churchyard). With embedded mitigation measures, there will be limited visibility resulting in a moderate adverse effect during construction and a slight adverse effect during the operational phase of the Bespoke Access Road. This view was taken from a grass verge on the west side of the western boundary of the church graveyard. Photo taken September 2025.



A view looking to the northwest from the boundary of St Andrew's graveyard showing the boundary providing good screening against the Bespoke Access Road, minimizing intervisibility. This view was taken from the western boundary of the church graveyard. Photo taken September 2025.

A view from the south off the A17 looking north along the dyke boundary screening the Bespoke Access Road. Asgarby church is approx. 270m east of this boundary. This view was taken just north of the A17 and the lorry layby, from within the field immediately north. Photo taken September 2025.



A view looking northeast toward Asgarby church from the west side of the dyke boundary close to the location of the Bespoke Access Road. This boundary provides good screening; however, the top of the church tower can be viewed resulting in a moderate adverse effect during construction and a slight adverse effect during the operational phase when the Bespoke Access Road will be a low feature and screened within the landscape with minimal movement and light from maintenance traffic. This view was taken from within the field north of the A17 lorry layby close to the alignment of the Bespoke Access Road. Photo taken September 2025.

Asgarby Hall, Grade II Listed	Grade II	Mediui
Building		

Medium Neutral (not significant)

Neutral during the operational phase because the Bespoke Access Road will be very rarely utilized, and the screening from the existing boundary will prevent intervisibility. Presently, it is impossible to view Asgarby Hall from the western side of this boundary. This would be the situation once the Bespoke Access Road was constructed. Also. your senses are turned towards the A17 Main Road to the south which can be glimpsed and heard from the road opposite Asgarby Hall.

- The Solar PV Exclusion Zone within the Solar Array Area will increase separation between the Proposed Development and Asgarby Hall.
- Existing boundaries screen views between St Andrews Church and Asgarby Hall and the Proposed Development.
- The Bespoke Access Corridor, where possible, will follow existing field boundaries in keeping with the historic landscape field pattern.
- Height restrictions are set (perimeter fencing ≤ 3m; pole mounted CCTV ≤ 5m; substation fencing ≤ 3.4m; acoustic fencing (if required) ≤ 4m; and substation ≤ 13m) to reduce visual impact and preserve rural character.
- Undergrounding the 400 kV Cable Route will retain the visual character/form of landscape to prevent harm to heritage assets through lack of permanent visual change. Upon decommissioning, the cabling will remain in situ and avoid any temporary setting effects.
- Motion detection security lighting will be used along with infrared lighting provided by the CCTV security system. Lighting at the BESS and Onsite Substation will be passive infrared (PIR) operated, calibrated to detect vehicles and personnel. All visible lighting will be 50W, installed at a maximum height of 4m with downward light fittings to prevent light spillage. This lighting strategy will help to maintain the



A view looking southeast showing Asgarby Hall set back from the road and further from the Bespoke Access Road. The set back from the road and the intervening distance and landscape would result in a neutral effect during the operational phase of the Bespoke Access Road. This view was taken from the east side of the road at Asgarby. Photo taken September 2025.



A view from the western side of the road opposite Asgarby Hall showing the intervening landscape and distance obstructing visibility to and from the Hall and Bespoke Access Road, the site of which is located

current light levels and preserve the beyond the dyke hedge tree boundary. This view was current night-time ambiance around taken from the east side of the road at Asgarby the asset. opposite and close to Asgarby Hall boundary. Photo taken September 2025. A view from the east side of the road by Asgarby Hall looking northwest towards the Bespoke Access Road, these views are obscured by the boundary and the Church of St Andrew, Asgarby. This view was taken from the east side of the road at Asgarby, opposite Asgarby Hall. Photo taken September 2025. Howell Grade II Medium Slight adverse (not • The Solar PV Exclusion Zone within Hall, Grade significant) the Solar Array Area will increase II Listed separation between the Proposed **Buildings** The assessment of Development and Howell Hall. (NHLE slight adverse effect is • The Bespoke Access Corridor 1168460) appropriate through located approximately 800m to the the introduction of north of Howell Hall, where possible, change to the wider will follow existing field boundaries setting of the keeping with the historic designated heritage landscape field pattern. assets from the • Height restrictions are set (perimeter Proposed fencing ≤ 3m; pole mounted CCTV ≤ Development, 5m; substation fencing \leq 3.4m; acoustic fencing (if required) ≤ 4m; A view looking towards Howell Hall from the southwest and substation ≤ 13m) to reduce showing the dense tree screening surrounding the

- visual impact and preserve rural character.
- Underground cabling of the 400 kV cable will retain the visual character/form of the landscape to prevent harm to heritage assets through lack of permanent visual change. Upon decommissioning, the cabling will remain in place to avoid any temporary setting effects.
- Motion detection security lighting will be used along with infrared lighting provided by the CCTV security system. Lighting at the BESS and Onsite Substation will be passive infrared (PIR) operated, calibrated to detect vehicles and personnel. All visible lighting will be 50W, installed at a maximum height of 4m with downward light fittings to prevent light spillage. This lighting strategy will help to maintain the current light levels and preserve the current night-time ambiance around the asset.
- The Solar PV Exclusion Zone within the Solar Array Area will consist of lowland meadow, with existing hedgerows retained and enhanced. Hedgerows to the north of the Solar PV Exclusion Zone will provide additional screening and create an intervening landscape between the Howell cluster of assets and the Solar Array Area. This measure will substantially reduce intervisibility between these assets within the Howell settlement and the Proposed Development.

Hall. This shows the Hall entrance open to the west, and the road further towards the north where the tree screening becomes dense towards Howell Fen Drove. This view was taken from the west side of Heckington Road looking northeast. Photo taken September 2025.



The photo above shows a view looking south from the northern section of the field forming the southern end of the Solar Array Area. The view is directed towards Howell Hall, which is not discernible and has no intervisibility. Embedded mitigation measures, including the infilling of the boundary north of Howell Fen and the Solar PV Exclusion Zone (located in the foreground of this photo), support this assessment. The image demonstrates that Howell Hall, the Church of St Oswald's, and the Old Rectory are not visible, and the resulting harm is considered less than substantial. Photo taken September 2025.



The above photo shows a view from the north just off the road and at the southern boundary of the Solar Array Area showing dense screening which would prevent views from and to Howell Hall. Therefore, the assessment of slight adverse is appropriate from the introduction of change to the wider setting of the Hall close to the Solar Array Area, and less than substantial harm. Photo taken in September 2025.