



# Fosse Green Energy

EN010154

## 8.4 Statement of Common Ground with Historic England

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VOLUME

**8**

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Planning Act 2008 (as amended)

Regulation 8(1)(e)

Infrastructure Planning (Examination Procedure)

Rules 2010

24 March 2026

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## Planning Act 2008

### The Infrastructure Planning (Examination Procedure) Rules 2010

#### Fosse Green Energy Development Consent Order 202[ ]

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#### **8.4 Statement of Common Ground with Historic England**

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Planning Inspectorate Scheme Reference	EN010154
Application Document Reference	EN010154/EXAM/8.4
Author	Fosse Green Energy Limited

<b>Version</b>	<b>Date</b>	<b>Issue Purpose</b>
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# 1. Statement of Common Ground Signatures

This Statement of Common Ground has been prepared and agreed by Fosse Green Energy Limited and Historic England.

Signed on behalf of Fosse Green Energy Limited

Name: Lloyd Sandles

Position: Director

Date: 23/0

Signature: [REDACTED]

Name: [REDACTED]

Position: Team Leader Development Advice

Date: 20/03/2026

Signature: [REDACTED]

## 2. Introduction

### 2.1 Purpose of this document

- 2.1.1 This Statement of Common Ground (SoCG) relates to the application submitted to the Planning Inspectorate on 18 July 2025 (the Application) by Fosse Green Energy Limited (the Applicant) for a Development Consent Order (DCO) for the Fosse Green Energy solar project (the Proposed Development).
- 2.1.2 This SoCG has been prepared by the Applicant and Historic England (HE) (together “the Parties”) in respect of the Proposed Development.
- 2.1.3 This SoCG has been produced to confirm to the Examining Authority (ExA) where agreement has been reached between the Parties and where agreement has not yet been reached. This SoCG will be revised and updated as appropriate and/or required by the ExA at relevant examination deadlines.
- 2.1.4 In particular, this SoCG focuses on the interaction between the Proposed Development and local cultural heritage assets.
- 2.1.5 As set out in the procedural decision made by the ExA on 22 August 2025 **[PD-005]**, the ExA requires final and signed SoCGs to be submitted at the midpoint of examination. In line with the Examination Timetable set out at Annex A to the Rule 8 Letter [PD-010], this is Deadline 3A (24 March 2026). Further to this, procedural decisions dated 21 November 2025 **[PD-007]** include Historic England as a party with which the Applicant must enter into a SoCG.
- 2.1.6 Application document references are taken from the EN010154 – Fosse Green Energy Examination Library.

### 2.2 The Proposed Development

- 2.2.1 The Application is for the construction, operation (including maintenance), and decommissioning of a ground-mounted solar photovoltaic (PV) electricity generating station with a capacity exceeding 50 megawatts, with battery storage, onsite substation, and associated infrastructure to generate and export/import electricity. The associated development includes, but is not limited to, access provision, battery storage, underground cabling, areas of landscaping and biodiversity enhancement, and a 400 kV underground Grid Connection Cable to connect the Proposed Development to the national electricity transmission network.
- 2.2.2 The Proposed Development will provide a significant amount of renewable energy over its 60-year operational lifetime supporting resilience, security and affordability of electricity supplies. It would be a critical part of the national portfolio of renewable energy generation that is required to decarbonise the UK’s energy supply quickly.
- 2.2.3 The Proposed Development will help meet the urgent need for this infrastructure to support “energy objectives, together with the national security, economic, commercial, and net zero benefits” as set out in the Overarching

National Policy Statement for energy (NPS EN-1) (Ref 1). As such it is infrastructure of critical national priority.

## 2.3 Parties to this Statement of Common Ground

- 2.3.1 The Parties have been, and continue to be, in direct communication in respect of the Proposed Development.
- 2.3.2 HE is a prescribed consultee under Schedule 1 of the APFP Regulations (Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009). HE works together with people and organisations across England to discover, protect and bring new life to our shared historic environment. HE has a duty to promote conservation, public understanding and enjoyment of the historic environment and provides advice, knowledge, support and services so the history that surrounds us all lives on and is loved for longer. HE is funded largely by the Department for Culture, Media and Sport.
- 2.3.3 The Applicant is a partnership between Windel Energy Limited and Recurrent Energy.
- 2.3.4 Founded in 2018, Windel Energy is a privately held company dedicated to driving the transition towards a sustainable future. Specialising in the origination, development and integration of renewable energy projects and low-carbon disruptive technologies, Windel Energy is at the forefront of clean energy innovation.
- 2.3.5 With a portfolio exceeding 5 gigawatts (GWp) of renewable power in various stages of development, Windel's team of talented professionals bring a deep understanding and high level of expertise in land viability, electricity networks, planning (Town and Country Planning Act 1990, Developments of National Significance) and consenting for Nationally Significant Infrastructure Projects, legal processes and construction feasibility.
- 2.3.6 Windel Energy adopt a long-term ownership approach, ensuring the efficient operation and management of renewable assets. Leveraging an extensive network of relationships, institutional grade infrastructure and in-house industry expertise, Windel is committed to delivering impactful and enduring energy solutions.
- 2.3.7 Recurrent Energy, a subsidiary of Canadian Solar Inc, is one of the world's largest and most geographically diversified utility-scale solar and energy storage project development, ownership, and operations platforms. With an industry-leading team of in-house energy experts, Recurrent Energy serves as Canadian Solar's global development and power services business.
- 2.3.8 To date, Recurrent Energy has successfully developed, built, and connected 12 GWp of solar projects and more than 5 GWh of energy storage projects across six continents. As of September 30, 2025, its global pipeline includes approximately 23 GWp of solar power and 73 GWh of energy storage capacity. The company also has over 14 GW of solar and energy storage projects under operations and maintenance (O&M) contracts.

## 2.4 Terminology

2.4.1 In the tables in Section 3 of this SoCG, 'Matters agreed, not agreed or under discussion' are coloured coded in column 5 and categorised as follows:

- a. "Agreed" (green) indicates where the issue has been resolved;
- b. "Not Agreed" (red) indicates a final position that a matter cannot be agreed; and
- c. "Under discussion" (amber) indicates where these points will be the subject of ongoing discussion wherever possible to resolve, or refine, the extent of disagreement between the Parties.

## 3. Record of Engagement

### 3.1 Summary of consultation

3.1.1 A summary of the meetings and correspondence that has occurred between the Applicant and HE is set out in **Table 3-1**.

3.1.2 The Applicant has a cost recovery agreement in place with HE, which has been in place since the pre-application period and will remain in place throughout the Examination.

**Table 3-1 Engagement between the Applicant and Historic England**

Date	Form of Correspondence	Details
11/09/2023	Email	Notification sent to HE of Non-Statutory Consultation by the Applicant.
11/09/2024	Email	Correspondence between HE and the Applicant's land referencing team to confirm whether HE have any assets or land interests within the Order Limits.
09/10/2024	Meeting – MS Teams	The aim of the meeting was to provide an update ahead of Statutory Consultation in relation to updated design and baseline assessment. In relation to archaeology, HE requested that details of impacts (piling etc.) are discussed in the Preliminary Environmental Information Report. With regards to built heritage, HE highlighted the following assets: Coleby Registered Park and Garden, Somerton and Haddington Scheduled Monuments, views of churches and Lincoln Cathedral and heritage assets in Norton Disney.
21/10/2024	Email	Statutory notification under Section 42 of the Planning Act 2008 issued by the Applicant to HE for the launch of Statutory Consultation.
29/11/2024	Email	Response to Statutory Consultation received from HE.
26/03/2025	Phone Call	Applicant phone call to request a meeting with HE Development Advice Team Lead on Monday, 31 March 2025.
31/03/2025	Meeting – in person	Update on development design and progress with settings assessment, discussion of settings study area. In particular, agreement that there would be no impacts on designated heritage assets as a result of construction work along the

Date	Form of Correspondence	Details
		Cable Corridor and upon Lincoln Cathedral (which is over 9.2km from the DCO Site). Confirmation that archaeological matters are subject to discussion /liaison with Lincolnshire County Council's (LCC) archaeological advisor.
20/06/2025	Email	Potential Main Issues for Examination (PMIE) letter sent via email to HE from the Applicant
02/07/2025	Email	HE confirmed receipt of the Potential Main Issues for the Examination (PMIE) document.
04/07/2025	Meeting – MS Teams	Follow-up on the PMIE to close-out outstanding queries and provide update on trial trenching work completed to date.
08/07/2025	Email	Consultee response to PMIE received by the Applicant
15/09/2025	Meeting – in person (on site)	Opportunity to discuss findings of archaeological trial trenching as works were on-going and to discuss the layout of the Proposed Development in proximity to Grange Cottage and heritage assets at Aubourn.
17/09/2025	Email / Letter	Notice under Section 56 of the Planning Act 2008 issued by the Applicant to HE.
24/10/2025	Relevant Representation	HE submitted a relevant representation to the Planning Inspectorate.
09/12/2025	Email	<b>Final Trial Trenching Report [REP2-036]</b> shared by the Applicant with HE for comment prior to formal submission as part of Deadline 2 of the Examination.
05/03/2026	MS Teams Meeting	Meeting to discuss outstanding matters in the SoCG and updates to the Framework WSI <b>[AS-001]</b> . These are expected to be resolved prior to Deadline 3A.

## 4. Matters agreed, not agreed or under discussion

### 4.1 Cultural Heritage

**Table 4-1 Cultural Heritage**

Reference	Description of Matter	Historic England Position	Applicant Position	Status
<b>Legislation and Policy</b>				
4.1.1	Accordance of the Cultural Heritage Assessment with Cultural Heritage Legislation and Policy	HE has not identified additional legislation and policy to be considered.	The Applicant considers that <b>Chapter 7: Cultural Heritage</b> of the <b>ES [APP-032]</b> , has identified and appropriately considered all applicable legislation and policy.	Agreed
<b>Methodology</b>				
4.1.2	Acceptability of the Cultural Heritage Methodology in the ES	HE finds the methodology adopted within <b>Chapter 7: Cultural Heritage</b> of the <b>ES [APP-032]</b> to be acceptable.	The Applicant considers that the methodology adopted within <b>Chapter 7: Cultural Heritage</b> of the <b>ES [APP-032]</b> is acceptable and has been derived from information obtained through consultation with stakeholders and by reviewing relevant guidance and studies.	Agreed
4.1.3	Acceptability of the Methodology for Appendix 7-G: Detailed	HE notes that the interpretation of <b>Appendix 7-G: Detailed Gradiometer Survey Report</b> of the <b>ES [APP-130]</b> may be somewhat cautious regarding areas affected by geological noise. For instance,	The Applicant recognises the limitation of the geophysical survey in certain areas affected by 'noise' from geological responses. The Cable Corridor has not been subject to trial trenching at this stage,	Under discussion

Reference	Description of Matter	Historic England Position	Applicant Position	Status
	Gradiometer Survey Report	the possible presence of periglacial cracking in the vicinity of CRC 049.02 and 050.02 (in the area of the cable route which—at the time of the production of the documents—has yet to be trenched) could be obscuring additional archaeological features, which warrants further consideration.	as detailed design for this area is yet to be developed. As part of an iterative approach to the detailed design process, the locations for construction activities associated with the Cable Corridor will be fed into the design for a programme of further trial trenching work, which will in turn inform the detailed design process and appropriate mitigation measures. This staged approach to further investigation of those additional areas is presented within the <b>Framework Written Scheme of Investigation [AS-001]</b> which has been finalised following completion of the <b>Trial Trenching Report [REP2-036]</b> submitted to the Examination at Deadline 2. The revised Framework Written Scheme of Investigation will be submitted to the Examination at Deadline 3. The comments regarding potential for additional archaeological remains will be addressed within relevant site specific WSIs which will be prepared for submission and approval to the relevant Local Planning Authority (LPA) prior to the carrying out of any archaeological works.	
4.1.4	Acceptability of the Methodology for	HE raises several concerns with <b>Appendix 7-H Written Scheme of Investigation for</b>	<b>Appendix 7-H Written Scheme of Investigation for an Archaeological</b>	Under discussion

Reference	Description of Matter	Historic England Position	Applicant Position	Status
	Appendix 7-H: Written Scheme of Investigation for an Archaeological Evaluation	<p><b>an Archaeological Evaluation of the ES [APP-131]</b>, including:</p> <ul style="list-style-type: none"> <li>a. Lack of reference to the East Midlands Historic Environment Research Framework (EMHERF) (Para 3.4). HE expects that in future iterations of the WSI, or any new Specific WSIs produced for post-DCO work, the EMHERF should be integrated from the start;</li> <li>b. The definition of an artefact's 'intrinsic interest' (Para 4.8); and</li> <li>c. The retention strategy of artefacts from stratified excavated contexts (Para 4.8).</li> </ul> <p>HE recommends that the remaining trenching and future Specific WSIs address these issues.</p>	<p><b>Evaluation of the ES [APP-131]</b> was subject to consultation with the archaeological advisor at LCC and was approved on 7 May 2025, prior to the evaluation commencing. However, the Applicant notes the comments from HE and the revised Framework Written Scheme of Investigation will be submitted to the Examination at Deadline 3. Additionally future site specific WSIs, which will be prepared for submission and approval to the relevant Local Planning Authority (LPA) prior to the carrying out of any further archaeological evaluation or mitigation, will address HE's concerns.</p>	
<b>Baseline</b>				
4.1.5	Acceptability of the Cultural Heritage Baseline in the ES	HE has not sought additional work on baseline conditions on the basis of further stages of investigation and design/mitigation response being appropriately deployed post-consent.	The baseline conditions which are detailed in <b>Chapter 7: Cultural Heritage</b> of the <b>ES [APP-032]</b> are representative of the baseline site conditions. The assessment in <b>Chapter 7: Cultural Heritage</b> of the <b>ES [APP-032]</b> and accompanying <b>Figure 7-1 Designated Heritage Assets</b> of the <b>ES [AS-036]</b> , <b>Figure 7-2 Non-Designated</b>	Agreed

Reference	Description of Matter	Historic England Position	Applicant Position	Status
			<b>Assets of the ES [AS-037] and Figure 7-3 Previous Archaeological Event of the ES [AS-038]</b> has considered both designated and non-designated heritage assets and buried archaeology. HE's Scoping Report Consultation Response confirmed the suitability of the approach to the Study Areas.	
4.1.6	Omission of Conservation Areas in Chapter 2 of the PEI Report	The contents of the PMIE were discussed in a meeting held with HE on 4 July 2025. HE indicated there was nothing further to add in an email dated 8 July 2025. HE does not seek further coverage on Conservation Areas.	Information on the Bassingham, Boothby Graffoe, and Coleby Conservation Areas has been included within <b>Chapter 2: The Site and Surroundings of the ES [APP-027]</b> . The Applicant and HE are in agreement that the level of coverage on Conservation Areas is appropriate.	Agreed
4.1.7	Acceptability of sampling undertaken as part of Appendix 7-I: Trial Trenching Report (Interim)	HE appreciates that this is an interim report but notes that a summary list of deposit samples taken wasn't provided (Para 2.7) and would have been valuable in helping understand the extent of sampling undertaken to date and identify any potential gaps in the evidence base that may need to be addressed. HE are content that the final <b>Trial Trenching Report [REP2-036]</b> submitted to the Examination at Deadline 2 addresses their concerns regarding deposit	It is acknowledged that <b>Appendix 7-I Trial Trenching Report (Interim) of the ES [APP-132]</b> did not provide additional information regarding sampling undertaken given the ongoing nature of the trial trenching works at the point of submission of the Application. However the final <b>Trial Trenching Report [REP2-036]</b> submitted to the Examination at Deadline 2, provides a detailed consideration of the relevant data as part of the decision-making process. The final <b>Trial Trenching Report [REP2-036]</b> includes the discussion of	Agreed

Reference	Description of Matter	Historic England Position	Applicant Position	Status
		sampling with further detail being addressed in the updated <b>Framework Written Scheme of Investigation [AS-001]</b>	finds and palaeoenvironmental evidence and was issued for comment to relevant stakeholders (including HE) on 9 December 2025.	
<b>Assessment Results</b>				
4.1.8	Acceptability of the Cultural Heritage Assessment Results in the ES	HE has not identified additional likely significant effects to those anticipated in the assessment provided the further stages of investigation and design/mitigation response are appropriately deployed post-consent..	The assessment results set out within <b>Chapter 7: Cultural Heritage</b> of the ES <b>[APP-032]</b> , including anticipated likely significant effects, are acceptable.	Agreed
4.1.9	Potential impact of the Proposed Development on views to Lincoln Cathedral.	HE has not identified scheme impacts in views to Lincoln Cathedral.	Detailed consideration of the setting of designated heritage assets is presented in <b>Appendix 7-D Detailed Heritage Asset Setting Assessment</b> of the <b>ES [APP-127]</b> . This concludes in Para 4.287 that <i>'the very limited degree of anticipated change to the wider rural landscape, which lies beyond the setting that meaningfully contributes to the significance of the Cathedral, as arising from development, would result in no harm to its overall heritage significance'</i> . A site meeting on 15 September 2025 allowed for further discussion and agreement that there would be no potential	Agreed

Reference	Description of Matter	Historic England Position	Applicant Position	Status
			impacts of the Proposed Development on views to Lincoln Cathedral.	
4.1.10	Potential impact of the Proposed Development on views toward Aubourn, specifically views towards the Grade II Listed medieval Old Church and Grange Cottage.	HE considers that removal of panels from 'Field 46' would reduce the adverse effects on proximal heritage assets including the rural context and experience of the village of Aubourn (specifically kinetic views on approach from the south), views towards the medieval Old Church (Grade II listed), and the non-designated heritage asset Grange Cottage.	<b>Appendix 7-D Detailed Heritage Asset Setting Assessment</b> of the <b>ES [APP-127]</b> concludes that the Proposed Development will result in less than substantial harm (lower end) to the heritage significance of the Grade II Listed Grange Cottage (NHLE 1061951) and no harm to Old Church (NHLE 1360538). After submission of the ES documents, an in-person meeting to discuss the layout of the Proposed Development in proximity to Grange Cottage and heritage assets at Aubourn was held on site on 15 September 2025. In response to HE's (as well as other stakeholders') concerns regarding the proximity of solar PV to Grange Cottage and heritage assets at Aubourn, the Proposed Development design has been amended to remove panels from the field immediately south-east of Grange Cottage (i.e. Field 46). This is secured via the <b>Works Plans [AS-105]</b> that were updated and submitted to the Examination as part	Agreed

Reference	Description of Matter	Historic England Position	Applicant Position	Status
			of Change Request 1 [AS-103] in December 2025.	
<b>Mitigation / Management Plans</b>				
4.1.11	Acceptability of mitigation measures in relation to buried archaeology proposed during operation and contained within Management Plans	<p>HE commented that current references to preservation (such as in the Framework Written Scheme of Investigation, Para 3.12-.16) refer only to construction phase activities, and there appears to be no reference to residual operational effects on buried archaeology within the current documentation. HE would consider it to be beneficial to include a clear commitment to identifying and documenting the locations of preserved archaeological areas, and to ensuring that this information is safeguarded for the long-term management of the site once operational.</p> <p>HE references its guidance Preserving Archaeological Remains (2016), Appendix 5 which states that reburied or surviving archaeological features on a site constitute a form of 'residual risk' for those inheriting or managing the site. There is a duty of care to inform the client, as well as any future contractors, owners, or occupiers, of these risks, particularly where they may</p>	<p>Measures relating to the protection of buried remains are included in the <b>Framework Operational Environmental Management Plan [REP2-015]</b> and the <b>Framework Written Scheme of Investigation [AS-001]</b> which has been finalised following completion of the <b>Trial Trenching Report [REP2-036]</b> submitted to the Examination at Deadline 2. The revised Framework Written Scheme of Investigation will be submitted to the Examination at Deadline 3A</p>	Under discussion

Reference	Description of Matter	Historic England Position	Applicant Position	Status
		affect future site use, maintenance, or modification.		
<b>Other</b>				
4.1.12	Provision of details of authors of Cultural Heritage Assessment documentation included in the Application.	HE notes that identifying authors would enhance transparency and enable readers to assess the qualifications and expertise of the authors and contributors. HE is pleased to see specialists identified by name in the WSI (Appendix 7-H).	Relevant qualifications and experience of the Cultural Heritage ES Technical Lead (at Cotswold Archaeology), providing oversight and quality assurance of all relevant deliverables, are included in <b>Appendix 1-C Statement of Competence of the ES [APP-120]</b> . In addition, relevant acknowledgements of the specialist teams are also listed in <b>Appendix 7-F Air Photo and LiDAR Mapping and Interpretation of the ES [APP-129]</b> , <b>Appendix 7-G Detailed Gradiometer Survey Report of the ES [APP-130]</b> page vi, and in <b>Appendix 7-H Written Scheme of Investigation for an Archaeological Evaluation of the ES [APP-131]</b> .	Agreed

## References

- Ref 1 Department for Energy Security & Net Zero (2025). Overarching National Policy Statement for Energy (EN-1). Available at: [Overarching National Policy Statement for Energy \(EN-1\) – December 2025](#)