

From: [REDACTED]
To: Great North Road Solar
Subject: Historic England EXQ1 response - Interested Party Reference number: [REDACTED]
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Attachments: [image021576.jpg](#)

Interested Party Reference number: [REDACTED]

Dear Sirs,

Application by Elements Green Trent Limited for the Great North Road Solar and Biodiversity Park The Examining Authority's written questions and requests for information (ExQ1): Issued on Friday 19 December 2025 Responses are due by deadline 2: Friday 16 January 2026

Thank you for consulting Historic England in regard to the Examiners questions (EXQ1) in relation to Great North Road Solar and Biodiversity Park.

We note we have been named as an interested party in Q2.1.21, Q.8.1.2, Q.8.1.13, Q8.1.14, Q.1.18 and Q.1.20.

Please find below our considerations and responses regarding these particular questions.

Q2.1.21

The applicant, NCC and Historic England

Requirement 11: Archaeology

The applicant, and other parties as relevant, are asked to address the following points:

- Does the reference at 11(1) to 'commence' include or exclude any permitted preliminary works?
- Is it acceptable that this be approved by the 'county authority', noted as being Nottinghamshire County Council?
- Is sufficient provision made for unexpected archaeological discoveries, areas with no known archaeology and the need for an archaeological watching brief?
- The Outline Archaeology Mitigation Strategy, section A11.8.6 sets out that following consent to proceed, the Written Scheme of Investigation (WSI) for the Stage 2 investigations will be submitted to the discharging authority (Nottinghamshire County Council) for approval. It also sets out that the Stage 3 Mitigation Measures WSI(s), would also be submitted to the discharging authority for approval. How would these provisions be secured through the dDCO?

In addressing their points, the parties are invited to suggest alternative wording which would address any concerns raised.

- The Draft Development Consent order current reads as follows; 11.—(1) No phase of the authorised development may commence until an archaeological mitigation strategy for that phase has been submitted to and approved by the county authority. The question asks does the reference at 11(1) to 'commence' include or exclude any permitted preliminary works?
Historic England would consider that preliminary works, such as further trial trench evaluation or excavation must have the approved Archaeological mitigation strategy and associated WSIs approved by the county authority. This is essential to ensure that a robust, holistic and considered approach to further evaluation and mitigation is in place prior to commencement of works.

- Question b asks, 'is it acceptable that this be approved by the 'county authority', noted as being Nottinghamshire County Council?'.
In line with AoC-002 and in consultation with Lincolnshire County Council, I can advise that Nottinghamshire County Council are appropriate to approve the specified required documentation.

- Question C asks 'Is sufficient provision made for unexpected archaeological discoveries, areas with no known archaeology and the need for an archaeological watching brief?'
In regards to unexpected archaeological features, the Archaeological mitigation strategy should have a separate section for how these will be dealt with, particularly with reference to significant archaeology. A revision to the AMS should be completed to address this. The AMS should demonstrate an iterative process by which unexpected archaeology is fed back into the overall strategy, and it can be mitigated in a staged approach.

In regard to areas of no known archaeology section A11.8.5.5 states 'In areas where there have been no known heritage assets noted within the Desk-based Assessment, no anomalies identified during the geophysical survey and/or no features uncovered during the Stage 1 or 2 evaluations, no mitigation may be proposed. These areas will be formally identified at the conclusion of Stage 2, noting this may be staged depending on the programme.' This statement does not factor level of significance. We would be comfortable that if no archaeological features, of any kind, are identified by trial trenching, that no mitigation is required. However, if non-designated archaeological features are identified, there should be a process by required mitigation is agreed with the local planning authority before it is determined that mitigation is required.

In regard to the need for an archaeological watching brief, section A11.8.5.4.4 of the AMS sets out the requirement. It states that the requirement will be dependent on the results of the Stage 2 investigations (trial trench evaluation) and will be applied where areas with archaeological remains are identified which are of "Low" heritage significance, as set out in Table A11.8.3. Though light on detail, this approach is proportionate and could be secured with the location specific Written Schemes of investigation, in agreement with the local planning authority.

d) We suggest regarding this question, NCC would be best to address this. We also take the opportunity to support their suggested revisions to the DCO wording in relation to this question.

Q8.1.2

Historic England/ NCC/ NSDC

Archaeological Desk-Based assessment

ES Chapter 11 Cultural Heritage and Archaeology [APP-054] section 11.5.1 (para 48) sets out that the conclusions of the Archaeological Desk-Based assessment [APP-251 - APP256] are predicative and probabilistic and the results of the geophysical surveys have not been ground-truthed in their entirety. As such, there are some cases where the potential presence of heritage assets or their significance are based upon professional judgement. Even so, it is suggested that precautionary approach, assuming a reasonable worst-case scenario (that is, any archaeological remains currently present this will likely be damaged or destroyed by construction related activities such as groundworks and earthmoving which could take place anywhere within the Order Limits) is reasonable. It is suggested that this is sufficient for the identification and assessment of likely significant effects.

The parties are invited to comment on whether this approach is reflected in the assessment overall, that is, is professional judgment reasonably and appropriately applied?

On the basis that the geophysical results have not been entirely tested, it is reasonable to assume the 'worst-case scenario' for these areas; this applied a risk averse approach, which is proportionate against the level of certainty within the baseline. However, on that basis, this approach should therefore also be applied where non-intrusive geophysical survey or trial trench evaluation has not been completed; there appears to be a slight incongruousness to the overall approach in the way. It's useful to note that while an application of professional judgement is wholly reasonable, this judgement is based on a somewhat limited understanding of the nature of the archaeological record, on the basis of limited ground-truthing through trial trench evaluation.

Q8.1.3

Historic England/ NCC/ NSDC

Approach to further archaeological assessment

Overall the Archaeological Desk Based Assessment [APP-251] concludes at A11.1.5 that there is the potential for buried archaeological remains of high heritage significance within the Order limits, with the highest potential for possible archaeological remains from the Neolithic, Bronze Age, Iron Age, the Romano British and the medieval periods. The need for, scale, scope, and nature of any further assessment and/or archaeological works following grant of the DCO would be approved following consultation with the local planning authority based on the outline Archaeological Mitigation Strategy (AMS) which sets out the proposed approach to further evaluation and subsequent mitigation. NPS EN-1 para 5.9.11 sets out that where a site on which development is proposed includes, or the available evidence suggests it has the potential to include, heritage assets with an archaeological interest, the applicant should carry out appropriate desk-based assessment and, where such desk-based research is insufficient to properly assess the interest, a field evaluation.

Noting this provision, the parties are invited to comment on whether the applicant has presented an adequate approach to assessment and mitigation.

Thus far, the applicant has undertaken a full desk-based assessment, a non-intrusive geophysical survey of the majority of the order limits and a targeted trial trench evaluation based on the results of geophysics, including some evaluation in some 'blank' areas. We note the intention and outlined proposed for post-DCO further assessment, and suggest this approach is best agreed with NCC.

Q8.1.14

Historic England/ NCC

Mitigation through preservation by record The Outline Archaeological Mitigation Strategy [APP-269] Section A11.8.5.4 sets out various methods for preservation by record, where this is "the practicable or feasible approach for archaeology".

Historic England and NCC are invited to comment on the suitability of the methods identified.

Broadly, we would agree the methods outlined are suitable. We would take the opportunity to reiterate that any areas requiring preservation by record should be agreed with NCC and, where necessary, Historic England. There should also be clear cross over and document hierarchy between that detailed in the AMS and the subordinate site-specific Written Scheme of Investigation (WSI). We would also recommend that any areas assigned to 'preservation in situ' have an appropriate management plan in the AMS (outlined in A11.8.8) and that these are linked to the CEMP, OEMP and DEMP.

Q8.1.18

Historic England, NCC

Significance of effects on heritage assets

ES Chapter 11 [APP-054] section 11.5.4 sets out a framework for the assessment of the significance of effects on heritage assets. On the basis of Table 11.4 it is suggested that for assets, or receptors, of 'very high' or 'high' values, which could include a world heritage site or a Grade I listed building, a 'low' magnitude of effect, which could include a 'minor change in setting... (to) listed buildings, sites and other features which may lead to a small reduction in the contribution the setting makes to the significance of the heritage asset with an appreciable loss in the assets overall significance.', would have a 'minor' effect overall. According to para 72, this would then equate to 'less than substantial harm to heritage significance (lower end of scale)'. This would not be significant in EIA terms.

Historic England /NCC/NSDC are invited to comment on whether this basis for the assessment is reasonable

As an over all approach, this does appear to be somewhat reductive. We would welcome discourse with the applicant; our position would be that generally, low magnitude effects on very high and high value (significant) resources should still constitute moderate adverse effects, regardless of whether there is a conflation with Significant effects in EIA terms.

Q8.1.20

The applicant/ Historic England/ NSDC/ NCC

Settings Assessment

The settings assessment scoping exercise [APP-255] set section A11.2.3 (para 20) sets out that due to the large number of assets within the study areas, those within conservation areas have been grouped within their conservation area. The heritage assets identified as potentially being impacted by development in their setting are identified on Figure 11.4 [APP-161] and listed in ES Chapter 11 [APP-054] para 166. This does not include those listed buildings identified as being located within those conservation areas that have been scoped into the settings assessment (for example Kelham and Maplebeck Conservation Areas). It is not, therefore, clear whether the effect of the development within the settings of these buildings, has been given specific consideration.

The applicant is asked to please clarify this point. The other parties are invited to comment on whether this forms a robust basis for the settings assessment of all the identified designated heritage assets.

We would welcome sight of the applicant response to the examiners question on this topic and welcome any further questions that may be of assistance in regards to this topic.

We hope these response assist your authority in determining this application, and we welcome any further questions if we can be of further assistance,

Yours Faithfully,

[REDACTED]

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Ensuring our heritage lives on and is loved for longer.
historicengland.org.uk

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