



Great North Road Solar and Biodiversity Park

Statement of Common Ground with Historic England

Document Reference – EN010162/APP/8.5A5B

Revision number 23

~~January~~February 2026

EP Rule 8(1)(e) Planning Act 2008

The Infrastructure Planning (Examination Procedure) Rules 2010

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Revision History

Revision	Revision Date	Authorised By	Position	Comment
Issue 1	17/09/25	ES	Head of Planning	1 st Draft for HE Review
Issue 2	25/11/25	ES	Head of Planning	Issue 2 for HE Review
Issue 3	8/12/25	ES	Head of Planning	D1 Submission draft for agreement

1 INTRODUCTION

1.1 PURPOSE OF THIS DOCUMENT

- 1.1.1 This Statement of Common Ground (SoCG) has been prepared to support an application (the Application) for a Development Consent Order (DCO) from the Secretary of State (SoS) for Energy Security and Net Zero under Section 37 of the Planning Act 2008 (PA 2008) for the proposed Great North Road Solar and Biodiversity Park Development (the Development). The Application has been submitted by Elements Green Trent Limited (the Applicant).
- 1.1.2 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.
- 1.1.3 SoCGs are an established means in the planning process of allowing all Parties to identify and focus on specific issues that may need to be addressed during the examination. This SoCG will be revised and updated as discussions between the Parties progress during the Examination.

1.2 PARTIES TO THIS STATEMENT OF COMMON GROUND

- 1.2.1 This SoCG has been prepared by (1) Elements Green Trent Limited as the Applicant and (2) Historic England (collectively, 'the Parties').

1.3 TERMINOLOGY

- 1.3.1 In the table in the Issues section of this SoCG:
- “Agreed” (Green) indicates where the issue has been resolved;
 - “Under discussion” (Amber) indicates where a matter is the subject of ongoing discussion; and
 - “Not Agreed” (Red) indicates a final position.
- 1.3.2 Where Historic England expresses agreement, it does so only in so far as it has considered the issue with regards to its statutory remit and on the basis of the information provided by the Applicant. Agreement is offered without prejudice to the submissions of other interested Parties who may have greater knowledge of technical or site-specific issues.

1.4 RECORD OF RELEVANT CORRESPONDENCE

- 1.4.1 The Applicant has undertaken consultation and engagement with Historic England throughout the development of the Application. The Applicant consulted Historic England in accordance with Section 42 of the PA 2008, about the Development and environmental impact assessment as part of the formal pre-application consultation and publicity procedures. This process afforded Historic England the opportunity to provide responses to the information provided at various stages of the pre-application process.
- 1.4.2 Table 1-1 identifies the discussions and correspondence that has taken place between the Parties to date.

Table **Error! No text of specified style in document.**-1 Record of Correspondence

Date	Type (meeting, etc.)	Topic
27/09/2024	Virtual Meeting	Introduction to the GNR Development
27/09/2024	Agenda	<ul style="list-style-type: none"> • Introductions • Development Briefing • SoCG • Public Benefits • AOB
30/09/2024	Email	Minutes of meeting held on 27 September with slide deck presented
20/05/2025	Virtual meeting	Update following issue of PEIR
22/9/25	Email	Issue 1 of the SoCG shared with HE for comment and review.
25/9/25	Email	Request for meeting to discuss the SoCG
30/9/25	Email	Follow up request for meeting to discuss the SoCG
8/12/25	Virtual meeting	Meeting to discuss draft SoCG.
8/12/25	Email	Applicant issued updated Draft SoCG for sign-off, reflecting HE comments.
15/01/26	Email	Updates to SoCG issued for sign-off

- 1.4.3 It is agreed that this is an accurate record of the key meetings and consultation undertaken between the Parties in relation to the issues addressed in this SoCG.

2 CURRENT POSITION OF THE APPLICANT AND HISTORIC ENGLAND

2.1 ARCHAEOLOGY

Table Error! No text of specified style in document.-2 Archaeology

Ref	Document Reference	Description of Matter	Applicant's/HE's Position	HE's/Applicant's Position	Status
2.1.1	TBC	Assessment Methodology	<p><u>Noted and agreed. HE would welcome further engagement in relation to the Outline AMS.</u></p> <p><u>HE have requested further consultation in respect of detailed design, secured by DCO Requirement. The Applicant considers the approach to assess the effects to buried archaeological remains, both direct and indirect physical effects, is appropriate.</u></p> <p><u>The assessment methodology is provided in Section 11.5.2 of the ES Volume 2, Chapter 11: Cultural Heritage and Archaeology [EN010162/APP/6.2.11] [APP-054] with supporting archaeological information provided in ES Volume 4, Appendix 11.1: Archaeological</u></p>	<p><u>The Applicant considers the approach to assess the effects to buried archaeological remains, both direct and indirect physical effects, is appropriate.</u></p> <p><u>The assessment methodology is provided in Section 11.5.2 of the ES Volume 2, Chapter 11: Cultural Heritage and Archaeology [EN010162/APP/6.2.11] [APP-054] with supporting archaeological information provided in ES Volume 4, Appendix 11.1: Archaeological Desk Based Assessment [EN0101/APP/6.4.11.1] [APP-251] [APP-252] [APP-253] [APP-254].</u></p> <p><u>Targeted archaeological evaluation (trial trenching) was undertaken in two phases and the</u></p>	Agreed

Ref	Document Reference	Description of Matter	Applicant's <u>HE's</u> Position	<u>HE's</u> Applicant's Position	Status
			<p>Desk Based Assessment [EN0101/APP/6.4.11.1] [APP-251] [APP-252] [APP-253] [APP-254].</p> <p>Targeted archaeological evaluation (trial trenching) was undertaken in two phases and the results are reported in ES Volume 4, Appendix 11.6: Phase 1 Trial Trenching Results [EN0101/APP/6.4.11.6] [APP-264] [APP-265] and ES Volume 4, Appendix 11.7: Phase 2 Trial Trenching Interim Results [EN0101/APP/6.4.11.7] [APP-266] [APP-267] [APP-268]. The Applicant considers that the archaeological evaluation is sufficient at this stage to inform the DCO examination.</p>	<p><u>results are reported in ES Volume 4, Appendix 11.6: Phase 1 Trial Trenching Results [EN0101/APP/6.4.11.6] [APP-264] [APP-265] and ES Volume 4, Appendix 11.7: Phase 2 Trial Trenching Interim Results [EN0101/APP/6.4.11.7] [APP-266] [APP-267] [APP-268]. The Applicant considers that the archaeological evaluation is sufficient at this stage to inform the DCO examination. Noted and agreed. HE would welcome further engagement in relation to the Outline AMS.</u></p> <p><u>HE have requested further consultation in respect of detailed design, secured by DCO Requirement.</u></p>	
2.1.2	Section 42 Statutory Consultation in the Consultation Report	Embedded Mitigation Measures	<p>NotedThe Parties agree that potential adverse effects have been minimised by designing the development to avoid, as far as possible, the most sensitive archaeological remains, such as sites of former settlements.</p>	<p><u>The Parties agree that potential adverse effects have been minimised by designing the development to avoid, as far as possible, the most sensitive archaeological remains, such as sites of former settlements.</u></p>	Agreed

Ref	Document Reference	Description of Matter	<u>Applicant's</u> <u>HE's</u> Position	<u>HE's</u> <u>Applicant's</u> Position	Status
			The boundary and location of the Work No.s have been adjusted to avoid sensitive archaeology in the vicinity of Cromwell and North Muskham. Where the probable sites of former settlements remain within the Order Limits the Work Area allocation has been changed to allow preservation in areas assigned to diverse grassland or other uses which is no change from the current situation.	<u>The boundary and location of the Work No.s have been adjusted to avoid sensitive archaeology in the vicinity of Cromwell and North Muskham. Where the probable sites of former settlements remain within the Order Limits the Work Area allocation has been changed to allow preservation in areas assigned to diverse grassland or other uses which is no change from the current situation.</u> <u>Noted</u>	
2.1.3	RR, WR	Further Mitigation (AMS)	<p>The requirement for flexibility in the design process to react to and reflect the nature of the archaeology present is noted and <u>Noted and agreed.</u></p> <p>The details of the archaeological fieldwork are set out <u>HE welcome the further trial trenching that has been committed to within the ES Volume 4, Appendix 11.8: Outline Archaeological Mitigation Strategy (AMS) [EN010162/APP/6.4.11.8] [APP-269], which will be secured by Requirement 11 in Schedule 2 of</u></p>	<p><u>Noted</u> The requirement for flexibility in the design process to react to and reflect the nature of the archaeology present is noted and <u>agreed.</u> HE welcome the further trial trenching that has been committed to</p> <p>The details of the archaeological fieldwork are set out <u>within the ES Volume 4, Appendix 11.8: Outline Archaeological Mitigation Strategy (AMS) [EN010162/APP/6.4.11.8] [APP-269], which will be secured by Requirement 11 in Schedule 2 of</u></p>	Agreed

Ref	Document Reference	Description of Matter	Applicant's <u>HE's</u> Position	<u>HE's</u> Applicant's Position	Status
			<p>the Draft DCO [EN010162/APP/3.1B].</p> <p>The impacts from BNG measures will be refined as HE have requested further consultation in respect of detailed design develops post consent. It is intended, secured by DCO Requirement.</p> <p>We raised that the Archaeological Mitigation Strategy will be amended as the design evolves approach to exclude substantial archaeological remains is noted and post consent evaluation is undertaken. It is anticipated welcomed, however that only a tiny proportion of BNG measures will involve, we would draw attention to the risk associated with non-construction related activities which could have an impact on buried, such as those associated with Biodiversity net Gain (planting, ecological ponds, scrapes, seeding etc). While excluding built form from areas of sensitive archaeology-</p>	<p>the Draft DCO [EN010162/APP/3.1B].</p> <p>HE have requested further consultation in respect of The impacts from BNG measures will be refined as detailed design, secured by DCO Requirement.</p> <p>We raised develops post-consent. It is intended that the approach to exclude substantial archaeological remains is noted Archaeological Mitigation Strategy will be amended as the design evolves and welcomed, post-consent evaluation is undertaken. It is anticipated however, we would draw attention to the risk associated with non-construction related that only a tiny proportion of BNG measures will involve activities, such as those associated with Biodiversity net Gain (planting, ecological ponds, scrapes, seeding etc). While excluding built form from areas of sensitive which could have an impact on buried archaeology is appropriate, the alternatives must</p>	

Ref	Document Reference	Description of Matter	<u>Applicant's</u> <u>HE's</u> Position	<u>HE's</u> <u>Applicant's</u> Position	Status
			<p>In regard to the completeness of survey to date it should be noted that geophysical survey coverage was c.90% and that trenching tested all geologies. This is considered to be proportionate, in line with developing best practice guidelines and characterised by NCC as 'largely sufficient to provide an acceptable level of data to inform the baseline for the Environmental Statement (ES) and an initial phase(s) of trial trench evaluation. <u>is appropriate, the alternatives must be adequately measured for risk of harm to archaeological deposits also. We raised concerns regarding the completeness of the pre-DCO submission archaeological investigation. While this seemingly is intended to be supplemented post DCO, we would draw attention to whether the completeness of the survey is sufficient to assess the archaeological potential at this time.</u></p>	<p>be adequately measured for risk of harm to archaeological deposits also. We raised concerns regarding the completeness of the pre-DCO submission archaeological investigation. While this seemingly is intended to be supplemented post DCO, we would draw attention to whether the completeness of the survey is sufficient to assess the archaeological potential at this time.</p> <p><u>In regard to the completeness of survey to date it should be noted that geophysical survey coverage was c.90% and that trenching tested all geologies. This is considered to be proportionate, in line with developing best practice guidelines and characterised by NCC as 'largely sufficient to provide an acceptable level of data to inform the baseline for the Environmental Statement (ES) and an initial phase(s) of trial trench evaluation.</u></p>	

Ref	Document Reference	Description of Matter	Applicant's <u>HE's</u> Position	<u>HE's</u> Applicant's Position	Status
2.1.4	TBC	Assessment of Effects (Archaeological remains)	<p><u>Noted and agreed.</u></p> <p>As set out in Section 11.8 of the ES Volume 2, Chapter 11: Cultural Heritage and Archaeology [EN010162/APP/6.2.11] [APP-054], five instances of possible minor to moderate effects to buried archaeological remains, therefore potentially significant in EIA terms, have been identified. These effects have been assessed prior to the implementation of the additional mitigation measures.</p> <p>Additional mitigation in the form of preservation in situ or preservation by record, in accordance with the ES Volume 4, Appendix 11.8: Outline AMS [EN010162/APP/6.4.11.8] [APP-269] will reduce the previously reported significant effects to minor adverse or negligible effects, which are considered not significant in EIA terms.</p>	<p><u>As set out in Section 11.8 of the ES Volume 2, Chapter 11: Cultural Heritage and Archaeology [EN010162/APP/6.2.11] [APP-054], five instances of possible minor to moderate effects to buried archaeological remains, therefore potentially significant in EIA terms, have been identified. These effects have been assessed prior to the implementation of the additional mitigation measures.</u></p> <p><u>Additional mitigation in the form of preservation in situ or preservation by record, in accordance with the ES Volume 4, Appendix 11.8: Outline AMS [EN010162/APP/6.4.11.8] [APP-269] will reduce the previously reported significant effects to minor adverse or negligible effects, which are considered not significant in EIA terms.</u></p> <p><u>The Development is considered to be in accordance with the NPSs, the NPPF and follows the Historic</u></p>	Agreed

Ref	Document Reference	Description of Matter	Applicant's <u>HE's</u> Position	<u>HE's</u> Applicant's Position	Status
			The Development is considered to be in accordance with the NPSs, the NPPF and follows the Historic England Guidance.	<u>England Guidance. Noted and agreed.</u>	

2.2 DESIGNATED HERITAGE ASSETS

Table ~~Error! No text of specified style in document.~~-3 Designated Heritage Assets

Ref	Document Reference	Description of Matter	Applicant's Position	HE's Position	Status
2.2.1	Section 42 Statutory Consultation in the Consultation Report	Assessment Methodology	The Applicant considers the approach to assess the effects to heritage significance arising from change within setting is appropriate. The assessment methodology is provided on Section 11.5 of ES Volume 2, Chapter 11: Cultural	Noted <u>and agreed.</u>	Agreed

Ref	Document Reference	Description of Matter	Applicant's Position	HE's Position	Status
			<p>Heritage and Archaeology [EN010162/APP/6.2.11] [APP-054], with supporting information on the setting of heritage assets provided in ES Volume 4, Appendix 11.2: Settings Assessment [EN0101/APP/6.4.11.2A] . Additionally, some of the assets considered within this assessment have been included due to location within the ZTV as prepared for and used by the ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA) [EN0101/APP/6.2.7] [APP-050].</p>		
2.2.2	Section 42 Statutory Consultation and RR	Assessment of Effects	<p>As set out in Section 11.8 of the ES Volume 2, Chapter 11: Cultural Heritage and Archaeology [EN010162/APP/6.2.11] [APP-054], no designated assets will be directly affected by the Development. Indirect effects were assessed for the designated assets, but the assessment has not reported any significant effects</p>	<p><u>Agreed.</u> Given the range of designated assets that have the potential to be impacted by change in setting, we highlighted that these must be given assessment and consideration proportionate to their significance.</p> <p>HE have requested further consultation in respect of detailed design, secured by</p>	Agreed

Ref	Document Reference	Description of Matter	Applicant's Position	HE's Position	Status
			<p>to heritage assets following the implementation of appropriate mitigation measures.</p> <p>The Applicant will continue the discussion with Historic England on the detailed design as well as in the development of additional mitigation to be incorporated into the final design and the Heritage Mitigation Strategy and Outline Written Scheme of Investigation.</p> <p>The Development is considered to be in accordance with the NPSs, the NPPF and follows the Historic England Guidance.</p>	<p>DCO Requirement. <u>HE have acknowledged that this was updated at Deadline 1 and is therefore agreed.</u></p>	

2.3 CUMULATIVE SCHEMES

Table Error! No text of specified style in document.-4 Cumulative Schemes

Ref	Document Reference	Description of Matter	Applicant's Position	HE's Position	Status
2.3.1	TBC	Assessment scope and methodology	The Applicant considers that the long list and short listed cumulative sites are properly scoped, and which are presented in ES Volume	Noted <u>and agreed.</u>	Agreed

Ref	Document Reference	Description of Matter	Applicant's Position	HE's Position	Status
			4, Appendix 2.1: Cumulative Assessment Stages 1 and 2 [EN010162/APP/6.4.2.1A] .		
2.3.2	TBC	Assessment of Effects	As summarised in Section 19.4 of the ES Volume 2, Chapter 19: Interrelationships [EN010162/APP/6.2.19] [APP-062] , potential in-combination effects of the Development on local people have been assessed as negligible, in almost all cases, and as a worst-case minor, which is not significant in terms of the EIA Regulations.	Noted <u>and agreed.</u>	Agreed

2.4 DRAFT DCO

2.5 SCHEDULE 2 (REQUIREMENTS)

Table Error! No text of specified style in document.-5 Schedule 2 (Requirements)

Ref	Document Reference	Description of Matter	Applicant's HE's Position	HE's Applicant's Position	Status
2.5.1	RR	Requirement 11	<p><u>Historic England had concerns with the wording in Requirement 11.</u> The Applicant considers that the use of 'substantially' is useful to both HE and NCC as it provides a degree of flexibility in relation to how the Outline AMS would need to be complied with. However, the Applicant would be content to remove the wording to avoid any modifier at 11(2) potentially introduces ambiguity. – and risk of dispute at post-DCO approval stage.</p> <p>The Draft Development Consent Order [EN010162/APP/3.1C] has been updated at Deadline 1 to confirm this position.</p>	<p>Historic England have concerns with the wording in Requirement 11. The Applicant considers that the use of 'substantially' as is used in a modifier at 11(2) potentially introduces ambiguity and risk number of dispute at post-established DCO approval stage.</p> <p>As submitted precedents, including the draft Helios DCO requirement 11 reads as follows:-. The SoS is therefore content that this is appropriate. The term provides a limited, but useful degree of flexibility in relation to how the Outline AMS to both HE and NCC.</p> <p>Archaeology 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</p>	<p><u>Agreed Under discussion</u></p>

Ref	Document Reference	Description of Matter	<u>Applicant's</u> HE's Position	HE's <u>Applicant's</u> Position	Status
				<p>authority. (2) The archaeological mitigation strategy submitted under sub-paragraph (1) must be substantially in accordance with the outline archaeological mitigation strategy. (3) The detailed archaeological mitigation strategy must be implemented as approved. Requirement 11 has been updated to respond to further comments shared by NCC, but would welcome views from HE.</p>	

3 SIGNATURES

3.1.1 The above SoCG is agreed between the Applicant and Historic England, as specified below.

Duly authorised for and on behalf of Elements Green Trent Limited	Name
	Job Title
	Date
	Signature

Duly authorised for and on behalf of Historic England	Name
	Job Title
	Date
	Signature
