

**From:** [REDACTED]  
**To:** [Great North Road Solar](#)  
**Cc:** [Midlands ePlanning](#)  
**Subject:** The Examining Authority's written questions and requests for information (ExQ2): Issued on Wednesday 4 March 2026  
**Date:** 25 March 2026 17:04:23

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**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 (ExQ2): Issued on Wednesday 4 March 2026**

**Our Ref:** PL00794580

**Interested Party Reference number:** [REDACTED]

Dear Sirs,

Thank you for engaging Historic England on the above cited Examining Authorities written questions in relation to Great North Road Solar and Biodiversity Park.

We note we are cited as potential respondents on the follow questions; Q2.2.13, Q8.2.4 , Q8.2.5, Q8.2.6 and Q8.2.9, responses are presented below.

**Q2.2.13** is directed to the applicant, NCC and Historic England. It relates to Requirement 11- Archaeology of the DCO wording.

The ExA has noted that the latest statement of common ground (SoCG) with Historic England indicates that there are concerns with the wording of this requirement [REP3-077]. Principally, we had concerns in relation to the Applicant's use of the word 'substantively' within the DCO. We considered that the introduction of the word 'substantively' left excessive room for deviation. However, we note the applicant's response, and have subsequently spoken about this topic, and we accept that there is seemingly a precedent for its use in prior DCOs, and while we consider it does leave some level of ambiguity, we suggest that alignment to the wording preferences expressed by NCC should be prioritised.

**Q8.2.4** is directed to the applicant and HE regarding the adequacy of pre-consent archaeological assessment

In our response to EXQ1, we stated that where geophysical results have not been entirely tested, it is reasonable to assume the 'worst-case scenario' for these areas. Essentially, our position would be that unless results have been ground truthed with trial trenching, this 'worst case scenario' should be applied broadly, to include any areas that have not been geophysical surveyed either, and given the limited trenching this approach should be applied, not just in specific locations.

During discussions with the applicant, the intention is to not complete any further significant archaeological evaluation prior to consent. While we remain of the position that this is a high risk approach in terms of characterising the nature of the archaeological record, and thus mitigation required, it is not completely unfeasible that post-consent works could address these concerns, following guidance and approval of NCC, the crux of the issue is that it is based on limited ground truthed data.

The SOCG, in its current form, will be reviewed with the applicant and revised for the next deadline.

**Q8.2.5** and **Q8.2.6** is directed to NCC and HE is related to Post-consent archaeological investigations and mitigation

Thank you for inviting Historic England's opinion on this question. We support that should archaeological investigations be completed post consent, the oAMS should suitably cover assurances and a level of detail that reflects the need for flexibility, given the limited pre-consent surveys and thus baseline data. We defer detailed comments on the oAMS to NCC, given they will have the most detailed engagement with the implementation of the document.

**Q8.2.9** relates to the SOCG.

We appreciate that a draft has been submitted, however, we are yet to sign a version. We will work with the applicant to aim for the next deadline for submission.

Thank you again for consulting us, we will continue to engage with the applicant regarding the SOCG in advance of deadline 5.

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