



Lime Down

Solar Park

Statement of Common Ground with Historic England (Clean)

June 2026

Revision 2

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The Infrastructure Planning (Examination Procedure) Rules 2010



Revision	Section Reference	Description of Changes	Reason for Revision
2	Table 2-1	Summary of engagement table updated with engagement from January 2026 to June 2026	To capture ongoing engagement between Historic England and the Applicant
2	Paragraph 3.1.1	Additional wording added to summarise the matters outlined in the SoCG	Text updated by Historic England to confirm scope of the SoCG
2	Table 3-1	Update of Historic England's position on Draft Development Consent Order	Additional text provided by Historic England
2	Table 3-2	Update of Historic England's position, removal of sub-topics and minor amends to Applicant's position	Additional text provided by Historic England and request to remove sub-topics from discussion. Applicant revisions to update document reference.

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Statement of Common Ground Signatures

This Statement of Common Ground has been prepared and agreed by Lime Down Solar Park Limited (the Applicant) and Historic England.

Signed on behalf of Lime Down Solar Park Limited.

Name:

Position:

Date:

Signature:

Signed by Historic England.

Name:

Position:

Date:

Signature

1 Introduction

1.1 Purpose of this document

- 1.1.1 This Statement of Common Ground (SoCG) has been prepared as part of the proposed Lime Down Solar Park Development Consent Order (the Application) made by Lime Down Solar Park Limited (the Applicant) to the Secretary of State for Energy Security & Net Zero (the Secretary of State) pursuant to the Planning Act 2008 (PA 2008).
- 1.1.2 This SoCG does not seek to replicate information which is available elsewhere within the Application documents. All documents are available in the deposit locations and/or the Planning Inspectorate website.
- 1.1.3 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. SoCGs are an established means in the DCO consenting process of allowing all parties to identify and focus on specific issues that may need to be addressed during the examination.

1.2 Parties to this Statement of Common Ground

- 1.2.1 This SoCG has been prepared by (1) Lime Down Solar Park Limited as the Applicant and (2) Historic England.
- 1.2.2 Collectively, Lime Down Solar Park Limited and Historic England are referred to as 'the parties'

1.3 Terminology

- 1.3.1 In the tables in Section 3 of this SoCG:
- "Agreed" indicates where the issue has been resolved.
 - "Not Agreed" indicates a final position, and
 - "Under Discussion" indicates where these points will be the subject of ongoing discussion wherever possible to resolve, or refine, the extent of disagreement between the parties.

2 Record of engagement

2.1 Summary of engagement

2.1.1 The parties have been engaged in consultation since July 2024. A summary of the meetings and correspondence that has taken place between the Applicant and Historic England is outlined in Table.

Table 2-1 Summary of engagement

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
25 July 2024	Online MS Teams Meeting between Project Team and Historic England.	Meeting to introduce the Scheme, provide a high-level review of identified heritage assets and discuss proposed methodology.
22 August 2024	Scoping Responses	Historic England responded to the Scoping Opinion and highlighted designated heritage assets within the 2km study area.
13 January 2025	In person meeting between Project Team and Historic England Science Advisor.	Site visits for evaluation trial trenching on Lime Down D.
29 January 2025	Email	Statutory notification under Section 42 of the Planning Act 2008 issued by the Applicant to Historic for the launch of the statutory consultation.
19 March 2025	Statutory consultation response	Response to the statutory consultation received from Historic England.
28 March 2025	In person meeting between Project Team and Historic England.	Site visit to Lime Down A to E.
22 May 2025	In person meeting between Project Team and Historic England.	Site visit to Bradfield Manor.
27 May 2025	Advice note sent to Project Team from Historic England	Advice note following site visit to Bradfield Manor.
3 June 2025	Email	Statutory notification under Section 42 of the Planning

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
		Act 2008 issued by the Applicant to Historic England for the launch of the targeted consultation
9 July 2025	Email	Confirmation from Historic England that no comments to the targeted statutory consultation.
29 October 2025	Email / letter	Notice under Section 56 of the Planning Act 2008 issued by the Applicant to the XXX
18 December 2025	Online MS Teams Meeting between Project Team and Historic England.	Meeting to provide update on scheme and to understand concerns regarding HDD and consider heritage impacts and mitigation in relation to Bradfield Manor.
09 January 2026	Relevant Representation	Historic England submitted a relevant representation to the Planning Inspectorate.
January to May 2026	Emails	Emails from Applicant to Historic England
9 April 2026	Written Representation	Historic England submitted a written representation to the Planning Inspectorate
14 April 2026	Email	Applicant provided Historic England with the draft SoCG for comment
22 May 2026	Online MS Teams Meeting	Meeting between Applicant's Heritage team and Historic England to discuss topics raised in the SoCG.
12 June 2026	Email	Historic England provided the Applicant with an updated draft SoCG

3 Matters Raised

3.1.1 This section sets out a table for each relevant topic, identifying where matters are agreed, still under discussion, or not agreed. Historic England are seeking to engage in this process only where we feel we can make a difference and secure a better outcome for the Historic Environment. We have identified three areas of concern we will be engaging with, namely,

- wording of dDCO relating to the archaeology mitigation process and human remains,
- assessment of impacts on Bradfield Manor Listed Building and
- the Outline Archaeological Mitigation Strategy.

3.2 Draft Development Consent Order

Table 3-1 Draft Development Consent Order

Reference	Sub-topic	Historic England Position	Applicants Position	Status
3.1.1	Schedules	<p>Historic England has concerns with Schedule 2 Requirement 18 Removal of Human Remains. This requirement is not needed or needs to be reworded to ensure burials of more than 100 years are dealt with by the archaeologist as set out in the OAMS.</p> <p>Updated Position</p> <p>We note we referred to a Requirement and not an Article of the dDCO.</p>	<p>Schedule 2 does not contain a Requirement in relation to the removal of human remains. This is instead considered in Article 18 (Removal of human remains) of the Draft Development Consent Order (DCO) [REP1-007]. This provision is considered necessary so that the discovery of any remains does not delay the implementation of the Scheme.</p> <p>The article operates by permitting the undertaker to remove human remains that were interred more than 100 years ago</p>	Under Discussion

Reference	Sub-topic	Historic England Position	Applicants Position	Status
		<p>Historic England have discussed this with their Legal Team and reviewed recent DCO decisions. There is inconsistency in the use of this particular Article across a number of DCOs.</p> <p>We just need to be assured that whatever mechanism is used it does not impact on the ability of the archaeologists to excavate, recover, analyse and archive human remains found during the archaeological mitigation.</p> <p>We note this will be managed through the OAMS as agreed via Requirement 12 of the dDCO. The removal of archaeological burials can be secured through the DCO or through a MoJ licence (Section 25 of the Burial Act 1857) obtained by the archaeological contractor at the start of the mitigation works. This will prevent any delay in receiving a MoJ licence during the post consent and construction phase.</p> <p>We are still exploring with our Legal Team suitable wording and the process to secure this.</p>	<p>and where no personal representative or relative is likely to object, before seeking instructions from the Secretary of State as to the reinterment of the remains. For any remains interred less than 100 years ago, the process for publishing notices and according with the wishes of the deceased personal representative or relatives is set out in the article.</p> <p>Where human remains are encountered in the course of archaeological works, their identification, investigation and treatment would be managed in accordance with the ES Volume 3, Appendix 12-6: Outline Archaeological Mitigation Strategy [APP-230] (in particular section 7.10), with works undertaken by suitably qualified specialists and in accordance with relevant legislation and guidance.</p> <p>In the absence of this article, where human remains are identified, the Applicant must comply with section 25 of the Burial Act 1857. In practice, this means that construction activity in the area where remains have been identified must stop whilst the Applicant applies to the Secretary of State for instructions for the removal of the human remains and</p>	

Reference	Sub-topic	Historic England Position	Applicants Position	Status
		We note that the ExA in their Written Questions 1, has asked for clarity on the use of this Article (DCO1.22)	subsequent reinterment. It is considered preferable for the Secretary of State to include instructions as to the removal of any identified human remains within the Draft DCO [REP1-007] in order that such a discovery does not delay the implementation of the Scheme. The Scheme is critical national priority infrastructure and Article 18 ensures that the discovery of a historic burial can be dealt with appropriately and efficiently, in accordance with the Archaeological Mitigation Strategy.	
3.1.2	Requirements	Historic England requested amendments to the wording of draft Development Consent Order requirement 12. Updated Position We note the the ExA has also asked for clarity on how Historic England and Wiltshire Council will be involved in the sign off process for WSIs (ExAQ1 CH1.15). The inclusion of our wording as suggested in our Written Representation may resolve this matter.	The Applicant considers that the current drafting in Requirement 12 and ES Volume 3, Appendix 12-6: Outline Archaeological Mitigation Strategy [APP-230] appropriately secures the programme of archaeological mitigation within the Scheme.	Under Discussion

3.3 Cultural Heritage

Table 3-2 Cultural Heritage

Reference	Sub-topic	Historic England Position	Applicants Position	Status
3.2.1	Approach to safeguarding designated heritage assets	<p>Historic England require visualisations showing what would be visible from Grade II* Listed building Bradfield Manor to assess visibility, confirm the effectiveness of mitigation planting, and determine whether further changes are needed to minimise or remove harm to the heritage asset.</p> <p>Updated Position</p> <p>Visualizations received and assessment made on impacts and level of harm. We have identified that the panels will cause harm but that harm is less than substantial. We note the mitigation undertaken in D2, D3 and D5 with setting back of panels and proposed screening.</p> <p>We note that in winter the screening will not be so effective and the panels more visible.</p> <p>We also note that longer distance views will be harder to mitigate and the harm</p>	<p>The Applicant notes Historic England's comments regarding additional visualisations and provided these additional visualisations for Deadline 1a (ES Technical Addendum to Chapter 12 Cultural Heritage - Bradfield Manor Visualisations (Rev 1) [REP1A-014]).</p> <p>The assessment results set out within ES Volume 1, Chapter 12: Cultural Heritage [APP-064], including likely significant and residual effects on designated heritage assets are acceptable.</p> <p>Where impacts have been identified to designated heritage assets (including relating to indirect setting impacts) these have been appropriately mitigated (see Section 12.9 of ES Volume 1, Chapter 12: Cultural Heritage [APP-064] for embedded mitigation and Section 12.11 for additional mitigation).</p>	Under Discussion

Reference	Sub-topic	Historic England Position	Applicants Position	Status
		caused by panels in those views can not be mitigated.		
3.2.2	Approach to safeguarding archaeological assets	<p>Historic England note that while Interim evaluation reports have been prepared, these do not include a final analysis of the sites and their significance. There are also outstanding geophysical surveys to be completed for the cable route. Historic England request these are completed and agreed prior to the final Mitigation Statement being agreed.</p> <p>Full evaluation reports now received and we will discuss the results on the 29th June and how these will feed into the OAMS.</p> <p>Geophysics reports not yet received.</p>	<p>Appendix 12.6: Outline Archaeological Mitigation Strategy (AMS) [APP-230] details the mitigation measures to safeguard archaeological assets including preservation in situ (using a non-intrusive construction methodology) and mitigation by record (including strip, map and sample) and is considered acceptable.</p>	Under Discussion