



**HISTORIC BUILDINGS AND MONUMENTS COMMISSION FOR ENGLAND
(HBMCE)**

(HISTORIC ENGLAND)

Application by

Lime Down Solar

PINS Reference No. EN010168

HBMCE Reference No. PL795841

Registration No.: FB95B33A1

Answers to Examining Authority's First Written Questions (ExQ2)

Deadline 5: 7th August 2026

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HISTORIC ENGLAND'S RESPONSE TO THE EXAMINING AUTHORITIES SECOND WRITTEN QUESTIONS.

Questions for Historic England

Cultural Heritage

Archaeology

CH2.5 Preservation by Record –

Receptor D24-01 In Appendix C to its WR [REP1-171], Stop Lime Down state that preservation by record, through its nature mitigates harm, it does not eliminate it to the extent assessed by the applicant. As such, Stop Lime Down consider that for receptor D24-01 the residual effect would be moderate adverse (significant), and for other receptors such as C13-01 and C29-01 it would be moderate/ minor. On the other hand, WCAS [REP2-046] consider that excavation of an archaeological site to Chartered Institute for Archaeologists (CIFA) and WCAS standards would substantially reduce the effect of impact upon archaeological sites of local and regional importance such that there would be a negligible adverse effect.

Historic England is asked to comment on the extent to which preservation by record can reduce the direct adverse effect on archaeology at this receptor?

In our view, based on policy, harm cannot be reduced by preservation by record.

This is because archaeological excavation is destructive and will only achieve a partial record of the remains, as not everything is 100% excavated. This is therefore harm to that heritage asset in NPPF terms or an adverse effect in EIA terms.

Archaeological evaluation will assess the archaeology looking at its preservation, extent, significance and its potential to provide information. A balancing exercise is then needed to look at that significance against the loss proposed by the development.

The reports on the evaluation have been shared with us and it is clear that the archaeology recorded so far is of local or regional importance.

Under EIA Regulations 2017 Section 14 Part 2 (e) Environmental Statements should include a description of any features of the proposed development, or measures envisaged in order to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment.

It does not refer to mitigation as this is a means to reduce the effect, which is not possible through the loss of the asset.

EN-3 2.10.109 States that 'Applicants should consider what steps can be taken to ensure heritage assets are conserved in a manner appropriate to their significance,.'

EN-1 4.1.5 then refers to the mitigation hierarchy – avoid, reduce, mitigate, or compensate for any adverse impacts. In this case using mitigate and compensate rather than offset.

The EN1 goes on to set out in 4.2.24 that applicants must apply the mitigation hierarchy and demonstrate that it has been applied. They should also seek the advice of the appropriate SNCB or other relevant statutory body when undertaking this process. Applicants should demonstrate that all residual impacts are those that cannot be avoided, reduced or mitigated.

Then in 4.2.25 it goes on to state that compensation, by definition, does not reduce an adverse effect resulting from a development. However, applicants should set out how residual impacts will be compensated for as far as possible. Applicants should also set out how any mitigation or compensation measures will be monitored and reporting agreed to ensure success and that action is taken.

In this case the archaeological excavation can be seen as the compensation. The recording of the archaeology will increase knowledge about the site and in this instance the wider landscape and how human intervention has affected that landscape over the last 10,000 years.

The applicant has shown that they applied the mitigation hierarchy across the whole site by identifying areas for preserving the archaeology in grassland where there will be no panels. Where this cannot be achieved, they are seeking to reduce the harm by looking at alternative foundation designs and micro-siting panels to avoid some of the archaeology. Where they cannot do this excavation areas have been identified.

The final location and extent of these are still to be agreed and finalised through the oAMS (Overarching Archaeological Mitigation Strategy).

CH2.6 Evaluation Trial Trenching Reports and the Outline Archaeological Mitigation Strategy (oAMS)

The ExA note from the statement of common ground (SoCG) between the applicant and both Wiltshire Council [REP4-061] and Historic England [REP4-065] that full evaluation trial trenching reports have been shared with these parties.

The Applicant:

1) The applicant is asked to submit the full evaluation trial trenching reports into the examination.

The Applicant, Wiltshire Council and Historic England:

2) The parties are each asked to provide an update of any discussions that have been undertaken in relation to the evaluation trial trenching reports and any resultant changes that would need to be made to the oAMS or Requirement 12 of the dDCO.

Historic England had previously reviewed and commented on the oAMS sending comments by e-mail on the 22nd May 2026. We had recommended that the oAMS should be updated following the final evaluation reports being provided.

The evaluation reports were shared with us on 4th June 2026. We then send comments on these on the 9th and 14th July 2026.

The updated oAMS was provided to Historic England on the 30th July 2026. We are currently reviewing that document and will return any comments by the end of next week, 13th August.

We have provided comments on the evaluation reports and are currently in discussion with the applicant to agree changes and additional works we feel are needed to fully understand the significance of the archaeology that has been recorded.

Any further changes to the dDCO Requirement 12 will then be reviewed.

All discussions will be summarised within the next version of the SoCG.

Built Heritage

CH2.10 Bradfield Manor Farmhouse (Grade I)

The ExA notes that the SoCG between the applicant and Historic England [REP4-065] records that the approach to safeguarding designated heritage assets is agreed. With regards to Bradfield Manor Farmhouse, the SoCG records that Historic England acknowledge that in winter the screening would not be so effective and that in the longer distance views the harm caused by panels would not be mitigated. The SoCG records that Historic England consider that the panels would cause harm, but that harm would be less than substantial.

Historic England:

- 1) Can Historic England confirm if it agrees with the applicant's assessment in the Heritage Statement [APP-219] that the harm to Bradfield Manor Farmhouse Would be at the lower end of the scale of less than substantial harm?*

The range of harm to the significance of heritage assets as defined by 'less than substantial' in the NPPF is wide, considering the very high bar that defines 'substantial harm'. The NPPF does not define a range of harm within the broader definition of 'less than substantial harm', although we agree that the harm caused by the proposed development is likely to be at the lower end. However, paragraph 212 of the NPPF requires the great weight to be given to conservation of heritage assets (and the more important the asset, the greater the weight should be), irrespective of the degree of harm.

CH1.12 Adaptive Management of Mitigation

With regards to the approach to mitigation for built heritage, the SoCG between the applicant and Wiltshire council [REP4-061] records that Wiltshire Council consider that the deadline 3 updates to the oCEMP [REP3 092] in line with the outline Landscape and Ecological Management Plan (oLEMP) [REP3-100] do not include any proposals for monitoring or assessing the efficacy of the landscaping in providing the mitigation envisaged or for making amendments if required in the future.

The Applicant:

1) The applicant is asked to review and respond with proposed measures for the adaptive management of mitigation.

Wiltshire Council and Historic England:

2) Wiltshire Council and Historic England are asked to propose any changes that should be made to the management plans to secure adequate monitoring, assessment of efficacy and adaptations to the mitigation measures as they deem necessary.

The monitoring section of the CEMP only allows reviews of the mitigation measures to be undertaken by the Environmental Manager on completion of the works (6.1.4). Therefore, Historic England agrees with Wiltshire Council that future monitoring of the landscaping measures are required to ensure their long-term effectiveness in minimising the harm of the development on the setting of Bradfield Manor. We defer to the recommendations of Wiltshire Council for the timetable for the long-term monitoring of the landscape measures.

CH1.13 Noise Impacts

In response to Stop Lime Down's WR [REP1-167], it is noted that the applicant states [REP2-039] that the noise impact on built heritage assets has been assessed to not constitute a significant effect on health and quality of life. The applicant is asked whether the significance of effect on health or quality of life is an appropriate threshold for determining whether noise from the proposed development would have an adverse impact on the setting of heritage assets or whether noise can have a significant effect on the setting and understanding of a heritage asset without crossing the threshold of significance for health or quality of life? In response, please provide references to any relevant guidance.

Wiltshire Council, Historic England and Stop Lime Down may also wish to comment on this matter.

Historic England does not wish to comment on the noise impacts on built heritage assets and effects on quality of life.