

Green Hill Solar Farm

EN010170

Statement of Common Ground: Historic England

Prepared by: Lanpro Services

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Contents

<u>1</u>	<u>Introduction</u>	<u>3</u>
1.1	Purpose of the Document	3
1.2	Parties to this Statement of Common Ground	3
1.3	Terminology and Referencing	3
<u>2</u>	<u>Record of Engagement</u>	<u>4</u>
2.1	Summary of Consultation	4
<u>3</u>	<u>Matters of Discussion</u>	<u>14</u>
3.1	Overview	14
3.2	Cultural Heritage	14
<u>4</u>	<u>Signatories</u>	<u>15</u>
4.1	Overview	15

List of Tables

Table 2.1: Record of Engagement	4
Table 3.2: Cultural Heritage	14



Issue Sheet

Report Prepared for: Green Hill Solar Farm

Examination Deadline 2

Statement of Common Ground: Historic England

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1 Introduction

1.1 Purpose of the Document

- 1.1.1 This Statement of Common Ground (SoCG) has been prepared as part of the proposed Green Hill Solar Farm Development Consent Order (the Application) made by Green Hill Solar Farm Ltd (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 that is available elsewhere within the Application documents. All documents are available on the Planning Inspectorate's website.
- 1.1.3 This SoCG has been produced to confirm to the Examining Authority (ExA) the matters on which 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) Green Hill Solar Farm Ltd as the Applicant and (2) Historic England (HE). Historic England is the Government's lead advisor on the historic environment, and are a non-departmental public body sponsored by, and reporting to the Secretary of State for Culture, Media and Sport.
- 1.2.2 Collectively, Green Hill Solar Farm Ltd and Historic England are referred to as 'the parties'.

1.3 Terminology and Referencing

- 1.3.1 In the Tables in Section 3 of this SoCG below:
- "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 to resolve, where possible, or refine, the extent of disagreement between the parties.



2 Record of Engagement

2.1 Summary of Consultation

- 2.1.1 The parties have been engaged in consultation since April 2024.
- 2.1.2 A non-statutory consultation took place in March to May 2024. The statutory consultation process took place between 7th November and 19th December 2024.
- 2.1.3 A summary of the meetings and correspondence that has taken place between Green Hill Solar Farm Ltd and Historic England (HE) in relation to the Application is outlined in **Table 2.1** below.

Table 2.1: Record of Engagement

Date	Form of Correspondence	Key Topics Discussed	Key Outcomes
April 2024	Online meeting with HE and the Applicant.	Meeting to introduce the Scheme, provide a high-level review of identified heritage assets and discuss proposed methodology. HE highlighted that consideration needs to be given to cumulative impacts and that consideration should be given to the Substation and Battery Energy Storage System (BESS) site due to proximity of the Castle Ashby Registered Park and Garden. Historic England noted that there was only one Scheduled Monument in close proximity to the Scheme and assessment works to date had not identified any potential buried archaeological remains relating to this within the Order limits.	Feedback used to inform assessment.
21.08.24	HE Scoping Opinion	HE in agreement regarding the study areas for designated assets as long as professional judgment is still <i>“applied to include particularly sensitive/important assets beyond the fixed radius”</i> . HE refers the Applicant to the LPA to agree study areas for non-designated heritage assets, HE highlighted <i>“the need for an approach to setting impact to take in the kinetic views, rather than fixed viewpoints”</i> and for the settings impact assessment, referred the Applicant to their published guidance at https://historicengland.org.uk/images-books/publications/gpa3-setting-of-	Feedback used to inform assessment.



Date	Form of Correspondence	Key Topics Discussed	Key Outcomes
		<p><i>heritage-assets/heag180gpa3-setting-heritage-assets/. HE also advised that "photomontages or visualisations would be helpful to aid the understanding of the impact to the setting of the designated and non-designated heritage assets."</i></p> <p>HE identified the following assets for the Applicant to consider:</p> <ul style="list-style-type: none">• scheduled monuments around Walgrave, including Walgrave moated site (NHLE: 1011036) and Abandoned areas of Walgrave Medieval village (NHLE: 1418583);• Grade 1 listed Church of St Mary and All Saints (NHLE: 1045863) in Holcot;• Mears Ashby, Ecton, Earls Barton, Grendon, Easton Maudit and Sywell conservation areas (including the designated built heritage assets within them).• Castle Ashby Registered Park and Garden <p>HE also stated that the landscape interaction of various designated assets with the River Nene, a careful appraisal of impact to setting contribution made by the relationship with the river, and other landscape features is recommended.</p> <p>HE also highlighted archaeological guidance (i.e. deposit modelling) and guidance on Planning and Archaeology (found at HEAN 17 Planning and Archaeology). HE stated that <i>"in order to effectively reduce risk to archaeological remains through design and mitigation, an iterative approach to field evaluation should be applied, including but not restricted to trial trench evaluation, a strategy for which should be developed in consultation with the Local Planning Authority. Certain</i></p>	



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		<i>classes of asset such as flint scatters and military remains will require bespoke approach. Additionally, any work within the scheduled area will require consultation with Historic England and the granting of consent."</i>	
19.12.24	HE PEIR response	<p>HE broadly support the approach taken by the Applicant to the Historic Environment.</p> <p>HE <i>"note that mitigation measures are presented and we recommend that all proposed mitigation measures are secured through an appropriate mechanism; the key document would be a suitable worded requirement within the Development Consent Order (DCO) supported by Outline WSI and Code of Construction Practice (CoCP) documents."</i></p> <p>HE <i>"recommend Historic England is a named party with the DCO and that we are consulted on the DCO wording in due course"</i></p> <p>HE <i>"recommend further archaeological evaluation is undertaken prior to the submission of the full ES and with enough detail to inform the DCO application, particularly in areas where there is a high archaeological potential."</i></p> <p>HE <i>"welcome further engagement in relation to the areas that have been identified as BNG areas. We would welcome further engagement as to appropriate ecological mitigation in this area, and proportionate archaeological mitigation in relation to proposals in these areas"</i></p> <p>HE <i>"ask that complete avoidance of these are prioritised as part of the cable search exercise. The cable corridor search area is vast, and therefore complete avoidance should be seen as a priority in determining the final cable corridor."</i></p>	Feedback used to inform assessment, design of the Scheme, Archaeological Mitigation Strategy and documents supporting the DCO (I.e. CEMP).



Date	Form of Correspondence	Key Topics Discussed	Key Outcomes
		<p>HE “note a number of sensitive receptors as identified as part of this PEIR, including conservation areas, registered parks and gardens and highly graded designated built heritage assets. We ask that these are given robust and careful assessment in relation to their settings, including views to and from these assets, and refer you to our published guidance which can be found here: https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritageassets/heag180-gpa3-setting-heritage-assets/.”</p> <p>HE “note a number of sensitive non designated heritage assets, such as Low Hill (HOB UID 345495), near site E. Direct impact, as well as setting impact should be considered in relation to scheme design. Likewise, we would welcome an assessment in relation to any upstanding earthworks within the scheme, and a mitigation strategy.” developed so as to not obscure their landscape interpretation.”</p>	
December 2024	Site Visit with HE and the Applicant	<p>Site Visit with HE to review the evaluation trial trenching (Site F) and to discuss the potential for impact to heritage as a result of the proposed substation and BESS.</p> <p>HE content with works being undertaken for the evaluation trial trenching. Recommended review of soil sampling strategy to ensure unnecessary samples were not being acquired.</p> <p>In depth discussion of the location of the substation and BESS site with consideration to Grendon Conservation Area (including Listed Buildings) and Castle Ashby Grade II Registered Park and Garden. Several locations were visited including within the proposed site, viewpoints from Grendon and Castle</p>	Feedback used to inform assessment and design of the Scheme.



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		Ashby Registered Park and Garden looking towards the proposed substation and BESS site. It was agreed that any potential harm could be screened by enhancing current hedgerow located along field boundaries.	
December 2024	Online meeting with HE and the Applicant.	Desk-top heritage-based review of Sites A, B, C, D, E, F and G.	Feedback used to inform assessment and design of the Scheme.
January 2025	Site Visit with HE and the Applicant	<p>Site visit to assess the potential for setting impacts to designated heritage assets adjacent to Green Hill B, E and F.</p> <p>Green Hill C, D and G not visited as no heritage concerns identified by HE.</p> <p>HE in agreement that design proposed at PEIR stage was well informed and takes into account key heritage constraints and considerations. As such, mitigation proposed is sufficient to mitigate potential harm caused by the scheme and after mitigation. Based on the site visit HE did not believe any impacts would be greater than less than substantial harm (in NPPF terms). Where there is potential for impact it is likely to be at the lower end of the scale.</p>	Feedback used to inform assessment and design of the Scheme.
February	Heritage feedback of PEIRs design, Historic England	<p>HE stated <i>"the design of the proposed development at PEIR stage has clearly been carefully considered with a multidisciplinary approach taken, and it is evident that the proposal is informed by the heritage considerations and constraints of the area. It is likely that there will be a degree of harm to the setting of numerous heritage assets arising from the proposed development. As referenced above, landscaping and how it is implemented will be a major factor in mitigating harm through visual impact to the historic</i></p>	<p>Feedback used to inform assessment and design of the Scheme.</p> <p>Heritage View Point (HVP) 2 is located on the eastern edge of Mears Ashby as shown in ES Appendix 12:1 Heritage</p>



Date	Form of Correspondence	Key Topics Discussed	Key Outcomes
		<p><i>environment. At this early stage it is not possible for us to comment definitively on the level of harm we believe will be caused to built heritage but with careful landscaping mitigation this harm is likely to be at a less than substantial level. We welcome further assessment work, particularly a Landscape and Visual Impact Assessment (LVIA)."</i></p> <p>Green Hill A, C, D and G – No concerns raised.</p> <p>Green Hill B – <i>"We visited the site so that Historic England could better understand the relationship of the site and the adjacent listed buildings. In particular, those buildings to the south of Green Hill B, some of which had been scoped out of assessment work with Overstone Old Rectory being scoped in. Historic England agree with the rationale discussed at the site meeting for scoping out two of assets due to their lack of visual relationship with the site. Overstone Old Rectory (scoped in) does have a visual relationship with the site and possibly a historic relationship in terms of ownership and/or use. As discussed, there is potential for cumulative impact to all three of these assets from this and other nearby development. Based on the information submitted we have no additional comments to make regarding the design of the Green Hill B at this PIER stage."</i></p> <p>Green Hill E – <i>"This site will be east of Mears Ashby and together with site F forms one of the largest sites. As discussed on site, the Mears Ashby Conservation Area is largely an inward facing and intimate space with views of the church principally confined to the centre of the settlement. Green Hill E will sit either</i></p>	<p>Statement [APP-110].</p> <p>Viewpoint 33 [APP-366] and Viewpoint 48 [APP-381] show the visual relationship between Site F and Castle Ashby.</p>



Date	Form of Correspondence	Key Topics Discussed	Key Outcomes
		<p><i>side of the Wilby Road, one of the principal access roads to and from the settlement and landscaping mitigation is proposed along this route. We raised concerns that the solar panels may have a visual relationship with the conservation area, particularly to the east of Mears Ashby. The offsetting of the panels to the south and east will help to mitigate visual impact with the addition of landscaping reinforcement and additional planting. As discussed, heritage viewpoints would be useful here to aid assessment of the effectiveness of the proposed landscaping mitigation. Based on the information submitted we have no additional comments to make regarding the design of the Green Hill E at this PIER stage.”</i></p> <p><i>Green Hill F – “This site will lie in between three settlements (Bozeat, Grendon, Easton Maudit), two of which have conservation areas and all three contain multiple heritage assets, including highly graded churches. The settlements and conservation areas are largely inward facing. However, there is some intervisibility between these settlements to varying degrees. Views of the church towers has been considered and the proposal to remove panels from the site area in between Grendon and Easton Maudit is welcomed. Views from the PRowS has also been considered and landscaping mitigation will help to reduce visual impact while not adversely impacting the character of the landscape. The site layout and landscaping proposal is clearly well thought out here and takes into account the heritage considerations with the existing topography and landscape. As with Green Hill E, heritage viewpoints would be useful to aid assessment of the</i></p>	



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		<i>effectiveness of the proposed landscaping mitigation. During the site meeting, near Easton Maudit, there were distant views of Castle Ashby from Green Hill F (in early January with sparse foliage). We suggest heritage viewpoints are taken to and from Castle Ashby in further assessment work. Based on the information submitted we have no additional comments to make regarding the design of the Green Hill F at this PIER stage."</i>	
September 2025	Response to Relevant Representations Lot 2: Statement of Common Ground Parties	<p>HE commented the following regarding built heritage assets: <i>"Through our pre-application engagement it would appear that careful consideration has been given, with a multidisciplinary approach taken regarding setting and indirect impact to designated heritage assets. It is likely that there will be a degree of harm to the setting of numerous heritage assets arising from the proposed development. As referenced above, landscaping and how it is implemented will be a major factor in mitigating harm through visual impact to the historic environment."</i></p> <p>HE highlighted the following:</p> <ul style="list-style-type: none">• Mears Ashby Conservation area• highly graded assets in both the settlements of Walgrave and Old• Bozeat, Grendon, Easton Maudit (two conservation areas and multiple listed buildings) <p>HE commented site layout and landscaping proposal is clearly well thought and considers the heritage considerations with the existing topography and landscape. HE highlighted heritage viewpoints would be useful to aid assessment of the</p>	Subsequent meeting with HE to discuss built heritage and archaeology (see below)



Date	Form of Correspondence	Key Topics Discussed	Key Outcomes
		<p>effectiveness of the proposed landscaping mitigation in additional locations around these settlements.</p> <p>HE commented the following regarding archaeology: <i>"Buried Archaeological remains We note that none of the proposed areas contain any designated archaeological assets (such as Scheduled Monuments, Registered Battlefields). The documentation supplied outlines the evaluative works that have been completed to date, including geophysical survey and evaluation trenching. We note the areas of denser archaeology identified, particularly in reference to area F, however we also welcome the approach taken in the Archaeological Mitigation Strategy (AMS) that dictates several additional areas for trial trench evaluation and strip map and sample excavation; we welcome this approach, and encourage further detailed engagement with the relevant local planning authority and ourselves as this work in undertaken.</i></p> <p>We also note that certain areas have been identified for in situ preservation (non-intrusive construction methodology); we encourage some further conversation with ourselves and the local planning authorities about the effectiveness of this approach long term. One aspect to note, is the AMS denotes areas of 'no solar development'. We would question the applicant regarding these areas. While they may not be proposed for 'solar development', we would ask that the applicant engages further with us regarding any other elements that may be in these areas, for example proposals for biodiversity net gain, as these may still have the potential for below ground archaeological impact"</p>	



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		<p>HE stated they have concerns with the wording of draft DCO requirement 12. <i>"The use of 'substantively' as a modifier at 11(2) potentially introduces ambiguity and risk of dispute at post-DCO approval stage. Whilst the Draft requirement points to multiple WSI's (11-1) it appears (further to the proposed trenching strategy) that the 'parts' are intended to be spatial units rather than stages of an iterative investigation process. This sense is reinforced by the absence of a mechanism for the results of post-DCO evaluation to also inform mitigation alongside the Outline Written Scheme of Investigation (oWSI). In those cases where additional assessment stage trial trenching was to be undertaken post-DCO there needs to be a mechanism whereby the results of that work have a material bearing upon the subsequent phase of archaeological mitigation scheme(s). Mitigation methods should not ultimately be approved in terms of their accordance with the (pre-DCO) Outline WSI without taking into account also the results of post-DCO evaluation. Mechanisms to address this need have been secured by the SoS in the DCO's (as made) at Mallard Pass, West Burton and Cottam Solar."</i></p>	

- 2.1.4 It is agreed that this is an accurate record of the key meetings and consultation undertaken between (1) Green Hill Solar Farm Ltd and (2) Historic England in relation to the issues addressed in this SoCG.



3 Matters of Discussion

3.1 Overview

3.1.1 **Table 3.2** below details by the matters agreed, under discussion, or not agreed with Historic England (HE) at the point of this document being published.

3.2 Cultural Heritage

Table 3.2: Cultural Heritage

Ref	Matter	Details of Matters for Discussion	Applicant Position	Consultee Position	Status
HE-01	Approach to safeguarding designated heritage assets	ES Chapter 12 [APP-049] and ES Chapter Appendix 12.1 [APP-110 to APP-120]	The assessment of designated heritage assets within a Heritage Statement (ES Chapter Appendix 12.1 [APP-110 to APP-120]), which was used to inform ES Chapter 12 [APP-049] is considered proportionate.	The Applicant awaits HE's comments.	Matter Under Discussion
HE-02	Approach to safeguarding designated heritage assets	ES Chapter 12 [APP-049] and ES Chapter Appendix 12.1 [APP-110 to APP-120]	Setting issues are considered appropriately mitigated for all designated heritage assets.	The Applicant awaits HE's comments.	Matter Under Discussion



4 Signatories

4.1 Overview

4.1.1 The above SoCG is agreed between Green Hill Solar Farm Ltd. (the Applicant) and Historic England, as specified below.

4.1.2 Duly authorised for and on behalf of **Green Hill Solar Farm Ltd**

Name:	
Job Title:	
Date:	
Signature:	

4.1.3 Duly authorised for and on behalf of **Historic England.**

Name:	
Job Title:	
Date:	
Signature:	