

PINs Registration and Relevant Representation Form

Section 56 Planning Act 2008

Response deadline: 27th February 2026

Our ref: PL00797458

Project: The Drovers Solar Farm

Your Ref: EN0110013

Response by: [REDACTED]
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The Drovers Solar Farm Development Consent Order Application Reference: EN0110013

S.56 Response – Historic England

About Historic England

The Historic Buildings and Monuments Commission for England (HBMCE) is better known as Historic England, and we are the Government's adviser on all aspects of the historic environment in England, including historic buildings and areas, archaeology and historic landscapes.

We have a duty under statute to promote conservation, public understanding and enjoyment of the historic environment. We are an executive non-departmental public body, and we sponsored by the Secretary of State for Culture, Media and Sport (DCMS).

The Proposal

The Scheme comprises the construction, operation, maintenance, and decommissioning of a solar photovoltaic (PV) electricity generating station and Associated Development comprising Battery Energy Storage System (BESS), a Customer Substation, and Grid Connection Infrastructure, including a new National Grid Substation.



Representation

We summarise our representation regarding this proposed project as follows.

1) General Comments

The site lies between Swaffham and Nar River valley along which there are a series of villages including South Acre and Castle Acre. There are a number of designated heritage assets here and within the surrounding landscape.

Of particular importance is Castle Acre which has a remarkable history and lies to the north of the site. At its northern end survives the Castle and to the south the Priory, both dating from the 11th century. In the 12th century a planned town was laid out between them. Numerous historic buildings from various periods survive here.

Historic England provided advice on the Preliminary Environmental Information Report (PIER) in a letter dated 9 July 2025.

In this we agreed with the extent of the study area and with the 15 designated heritage assets identified for assessment within the chapter on Cultural Heritage and Archaeology.

Following our advice on the PIER, we welcome amendments to the scheme to reduce the impact of the scheme on Castle Acre. These comprise:

- the relocation of the substations and BESS from the northern edge of development, fields 33 and 35, to the south of Bartholemew's Hill Plantation and
- the setting back of solar arrays from northern half of field 33.

Despite this mitigation, there are still some views of the scheme from the Castle and Priory. The applicant has not engaged us in any further pre application advice. We would welcome the chance to explore if any additional mitigation can be achieved. There are also elements of the assessment that we consider would merit further work.

2) Impacts on designated and non-designated heritage assets

Our primary consideration in relation to the scheme is the impact of the proposal on the significance of highly designated heritage assets comprising scheduled monuments, grade I and grade II* listed buildings, and conservation areas.

As is set out above, the focus of our comments will be on the highly designated heritage assets at Castle Acre.



The assessment of the contribution setting makes to significance in relation to the Castle and Priory is somewhat underplayed in the Environmental Statement. The significance of the conservation area is also undervalued.

The impact of the development upon the significance of these assets requires some further consideration. The assessment follows the general approach to undertaking an Environmental Impact Assessment. However, there is no explicit assessment of the level of harm in relation to the assets. This is required to inform mitigation measures and to enable the weighing of the harm against the public benefits of the proposal, Overarching National Policy Statement for Energy, EN1 5.9.33.

The impact of the overhead line providing a connection to the National Grid Substation will also be discussed. There are two scenarios presented for this, Scenario A, (installation of a new line and retention of existing) and Scenario B (installation of a new line and removal of existing). The former would result in a higher level of harm to the historic environment. Our preference for Scenario B will be discussed in our written representations.

We will also consider the impact of the proposals on the Deserted Medieval Village at Great Palgrave which is a scheduled site monument; St Georges' Church, South Acre and the grade II registered landscape at Narford Hall which forms part of the setting of the grade I Hall.

In relation to the direct impacts, several parts of the scheme would require excavation and could impact below ground archaeology. The substations and BESS require piled foundations. Further information is required about the foundations for the pylons. The mitigation planting could also have an impact on buried remains.

An Outline Archaeological Mitigation Strategy (Section 8.9.1) is provided. The approaches to mitigation in the strategy are as we would expect. However, the precise layout of parts of the scheme are not yet available, so the details of the areas of the mitigation cannot yet be determined. This information needs to be provided to ensure appropriate mitigation is being applied to each area. Primarily we want to be reassured by the applicant that the mitigation is appropriate and proportionate to the significant of the heritage assets.

We are also aware the development will result in a range of potentially significant impacts on non-designated heritage assets and archaeological sites. We will not be commenting on this matter in detail and will defer to the LPA and their expert and specialist advisors.

3) Development Consent Order

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Correspondence or information which you send us may therefore become publicly available.



We note a Draft Development Consent Order has been provided. In the event of the project being consented, we would want to ensure that there is adequate mitigation and enhancement, and that this is appropriately secured through the consent order. We will therefore be providing comments and recommendations on the DCO wording.

4) Specialist Science Advice

We will provide specialist science advice in relation to the proposed ground works. Issues such as chemical pollution, changes to ground water flow and compaction of soils have been discussed within Chapter 12 Water Resources. It should be noted that changes to groundwater levels or compaction of archaeological deposits may result in physical damage or changes to the preservation of an archaeological site. These will also be discussed.

We will provide comment on the Desk Based Assessment and Geophysical Survey Report and Outline Archaeological Mitigation Strategy. Whilst the latter is generally appropriate, the provision for preservation in situ requires further consideration, paragraphs 3.10 and 3.11.

Summary

As set out above we will be looking to make further comments on the above in our Written Representation and to ensure that the DCO is appropriately worded to provide necessary mitigation for the historic environment.

We would also welcome the opportunity to resolve a number of matters through a Statement of Common Ground with the applicant if this would be considered appropriate and useful by the Examining Authority.

In the meantime, if you require clarity or further information on any matters we have raised here or have other comments, please do not hesitate to contact us directly.

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