PLANNING ACT 2008 (AS AMENDED) – SECTION 88 AND THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES 2010 (AS AMENDED) – RULE 8

APPLICATION BY THE DROVES SOLAR FARM LIMITED FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE DROVES SOLAR FARM

APPLICATION REF: EN0110013

SUBMISSION DEADLINE: 2 JUNE 2026

WRITTEN REPRESENTATION OF THE HISTORIC BUILDINGS AND MONUMENTS COMMISSION FOR ENGLAND (HISTORIC ENGLAND)

REGISTRATION ID: [redacted]

Contents

Summary

The development site lies between Swaffham and the Nar River valley along which there are a series of villages including South Acre and Castle Acre. There are several 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. The Castle lies on the eastern edge and the Priory to the south west, 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.

Following our advice on the PIER, we welcome the amendments which have reduced the impact of the scheme on the designated heritage assets at Castle Acre. These amendments comprise:

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

However, parts of the proposal would still be visible from the Castle and Priory, both of which lie within the Conservation Area. Much of the impact would be from the doubling effect created by the overhead line proposed under Scenario A.

The impact of the development would detract from the rural landscape which contributes to the significance of these assets and result in moderate level of harm (less than substantial harm) to the significance of the scheduled monuments and harm of a lower level to the conservation area.

Historic England considers this a significant effect to the highly designated heritage assets in Castle Acre which equates to harm in planning policy terms. We accept the harm cannot be wholly avoided but in Environmental Impact Assessment terms these effects could be partly mitigated through Scenario B.

Historic England therefore strongly supports Scenario B. We would like the applicant to commit to this option to address the harm to the significance of these designated heritage assets.

Further details on our position are set out in the advice below.

1. Introduction

1.1 The Historic Buildings and Monuments Commission for England (HBMCE), known as Historic England, is the Government's adviser on all aspects of the historic environment in England. It is our duty under the National Heritage Act 1983 to secure the preservation and enhancement of the historic environment including historic buildings and areas, archaeology and historic landscape with a duty to promote public understanding and enjoyment. This extends to sites and places in, on, or under the seabed within the seaward limits of the UK Territorial Sea adjacent to England.

1.2 Historic England is an executive Non-Departmental Public body sponsored by the Department for Culture, Media and Sport (DCMS) and we answer to Parliament through the Secretary of State DCMS. Our objective is to ensure that the historic environment generally, and marine and designated heritage assets especially, are fully considered in the determination of this DCO.

1.3 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.

1.4 The proposed development would be within the setting of a range of highly designated heritage receptors, including listed buildings, conservation areas, and scheduled monuments. It would impact on the historic environment and we consider this is significant in relation to some of the heritage receptors and in relation to EIA policy.

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

1.6 We submitted a Section 56 Relevant Representation and hereby provide detailed comments to expand on the matters highlighted in our representation.

1.7 Following our Section 56 response we have had a further meeting with the applicant's heritage consultant to discuss the proposals.

1.8 The submitted application includes an Environmental Statement (ES), dated November 2025, produced to satisfy the requirements of Environmental Impact Assessment (EIA) requirements, under the terms of European Union Directive 2011/92/EU (as amended by Directive 2014/52/EU)) on the assessment of the effects of certain public and private projects on the environment (EIA Directive). The EIA Directive is transposed into English law for Nationally Significant Infrastructure Projects (NSIPs) by The Infrastructure Planning (EIA) Regulations 2017.

1.9 We confirm the ES is broadly adequate for the purposes of the examination. The baseline and assessment are set out in the accompanying ES chapters. It was agreed during the scoping process that a detailed assessment of the impact of the proposal upon the historic environment would be required, and this is provided here.

1.10 We are pleased to see the inclusion of an Outline Archaeological Mitigation Strategy in this DCO application (Appendix 8.7). This contains provisions to produce a post-consent WSI and detailed mitigation. We have provided comments on the proposed measures and suggested revisions where appropriate. We would expect that outline strategies will be agreed and amended with Historic England prior to being adopted.

1.11 We also recommend the wording of the draft DCO requirement is revised before the end of the examination. The revised requirement should include additional provision for Historic England's involvement in approval of the mitigation and enhancement measures. The Examination Authority will also need to be satisfied that the requirements are sufficient to mitigate the negative impacts of the proposal on the historic environment.

2. Designated Heritage Assets: Listed Buildings, Conservation Areas and Scheduled Monuments

General Comments

2.1 The information relevant to the historic environment assessment is found primarily in the following documents:

- Statutory Historic Environment Features Plan [APP-015]
- Non-Statutory Historic Environment Features Plan [APP-16]
- Environmental Statement - Chapter 8 Cultural Heritage and Archaeology [APP-057]
- Environmental Statement Appendix 8.2: Stage 1 and Stage 2 Setting Assessment [APP-152]

2.2 Our primary consideration 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 set out above, the focus of our advice is on the highly designated heritage assets at Castle Acre.

2.3 We have not provided advice on grade II listed buildings, non-designated buildings, and the majority of the non-designated archaeology. We would defer to the local planning authority heritage, landscape, conservation and archaeological advisers in this regard.

2.4 We have only provided text on a selection of assets where we feel comment would add value to the examination and/or where we have specific issues of concern or recommendations.

Methodology

2.5 The Cultural Heritage and Archaeology assessment follows the general approach to undertaking EIA using a matrix, modified to cover the full range of heritage assets, magnitude of impact and scale of effect. The assessment methodology notes that professional judgement will be used alongside the matrix (8.5.6, 8.5.8 and 8.5.16).

2.6 We support the matrix approach when used alongside professional judgement. This enables a more nuanced assessment than a matrix sometimes allows for, particularly in considering significance and levels of harm. In particular it can help with articulating levels of harm to assist when weighing this against public benefits as required by paragraph 5.9.33 of the Overarching National Policy Statement for Energy (EN- 1).

2.7 There are two areas in the assessment where we consider the matrix approach places limits on the applicant's assessment. This could be overcome if modified by professional judgement in the assessment.

2.8 The first is the sensitivity of receptor table (Table 8.1) which ranks conservation areas as medium (regional) sensitivity. This will be a reasonable ranking for many conservation areas. However, although we did not raise this in the initial assessment at the PEIR stage, on further reflection the sensitivity of Castle Acre Conservation Area could be considered to be high (national).

2.10 The second is the criteria for determining magnitude of impact (Table 8.2) which ranks the impacts but does not provide a nuanced approach to assessing less than substantial harm in relation to the impact on setting. As less than substantial harm is a broad category into which most cases resulting in harm will fall, a more nuanced approach to considering this would be helpful.

A low adverse impact is defined as, 'Some harm to the heritage asset's setting, but not to a degree that it would materially compromise the significance of the heritage asset. Perceivable level of harm, but insubstantial relative to the overall interest of the heritage asset.'

A medium adverse impact is defined as, 'Considerable harm to a heritage asset's setting, such that the asset's significance would be materially affected/considerably devalued, but not totally or substantially lost.'

Castle Acre Castle (Scheduled Monument (NHLE 1017909) with Grade I Listed elements (NHLE 1171480)

2.11 Castle Acre Castle survives as a powerful expression of Norman power. It is an excellent example of a motte and bailey castle, comprising the remains of a shell keep, some of the finest surviving earthworks in England and other structural ruins. It illustrates defensive strongholds of the period and has close associations with the ruling elite.

2.12 The Castle was probably constructed soon after the Norman Conquest in 1066. It was then strengthened with the establishment of the keep and further earthworks during the 'anarchy' of the reign of King Stephen. Nationally there are only 71 recorded examples of shell keeps

2.13 It was held by the de Warenne family who supported William the Conqueror and his descendants. It remained an important administrative centre during the 12th and 13th centuries hosting both King Henry II and Edward I.

2.14 The setting contributes to the significance of the Castle. It occupies a strategic position on the northern slope of the River Nar valley overlooking the Peddars Way crossing point of the river (which at that time was navigable).

To the west is the planned Norman town, one of several established in Norfolk. It has been affected very little by later development, the principal elements of the original layout remain clearly apparent. The survival of much of the surrounding ditch and part of the bank as visible earthworks, and of the north gate of the town, are especially worthy of note.

The Castle commands views across the surrounding countryside, especially from the elevated position on the mound. These show how it was designed to dominate and control the surrounding area. While the village has expanded to the north, there are extensive views from the north east to the south west along the Nar valley.

2.15 Despite changes in agricultural practices over the centuries, the setting beyond the village remains an essentially rural landscape. This contributes to the aesthetic character of the castle and conveys the context in which the Castle has stood for almost 1000 years.

The main intrusion into these rural views are the overhead power lines and wind turbines which are visible on the skyline in the distance to the south. These contrast with the otherwise largely rural landscape.

2.16 There is much useful analysis of the significance of the Castle within the Cultural Heritage chapter of the ES, but we consider the rural setting provides a greater contribution to significance than the assessment of 'some contribution' (8.6.9).

The comment that 'it would still hold a high level of significance if removed from it setting' (8.6.10) rather downplays the importance of the setting of designated heritage assets which is clearly set out in the EN-1 9.9.3.6 and the National Planning Policy Framework (NPPF) 213.

2.17 The wireline (Figure 6.12) and photomontages (Figure 6.14) viewpoint 14 show two areas of panels would be visible just below the horizon from the earthworks around the outer bailey. They may also be visible from some of the other raised areas within the inner and outer bailey. These are two modest areas of panels set between wooded areas and seen as part of more expansive views.

2.18 The overhead lines have a greater visibility than the proposed panels given their height and how they puncture the skyline. Under Scenario A which is illustrated as the worst-case scenario, the combined effect of the existing and new overhead powerlines would increase the prominence of these across the skyline towards the south, with c.3 additional pylons. Under Scenario B additional pylons might be visible but at a greater distance and therefore would have less impact.

2.19 Under Scenario A this would result in a moderate level of harm to the significance of the Castle and a moderate scale of effect, but at the lower end of this, and that we consider to be significant in EIA terms.

We therefore consider the level of harm to be higher than the low/negligible magnitude of impact identified in the applicant's assessment. We also consider the effect to be higher than the conclusion of a minor adverse effect which in the assessment is not significant in EIA terms (8.8.38).

2.20 The harm would be reduced to a low level under Scenario B. We conclude this would be a little higher than the applicant's assessment of negligible, resulting in a Neutral effect, which is not significant.

Castle Acre Priory (Scheduled Monument (NHLE 1015870) with Grade I Listed elements (NHLE 1342389 & 1171437))

2.21 Castle Acre Priory has some of the finest and impressive surviving monastic remains in Norfolk. The large precinct contains a wide range of building remains and earthworks. These illustrate monastic life which played such a central role in medieval society.

2.22 It shows the influence of the Norman conquest as a Cluniac order became established in England following this.

2.23 It was a gift from the de Warenne family and the contemporary Norman castle and planned town and the associations with the de Warenne family enhance the significance of the Priory.

2.24 Significant upstanding remains survive illustrating the layout of the Priory and its architecture. These include the gatehouse, the priory church, sacristy, dormitory, infirmary and the impressive west front of the church and adjacent west range including the Prior's lodgings with his study and chapel on the upper floors.

2.25 The setting of the Priory contributes to its significance. It occupies a typical position for these houses, in the valley bottom of the River Nar with the protection of a nearby castle. The surrounding rural landscape contributes to the picturesque aesthetic characteristics of the ruined monastic complex. From the high ground on the northern side of the precinct there are more extensive views across the wider landscape.

2.26 As with the Castle, the main intrusions into the rural setting are the overhead power lines and wind turbines which are visible on the skyline. The Priory is closer to these than the Castle, and here they detract more from the rural setting. They are particularly visible from the higher ground to the north, but are also seen from the heart of the priory, for example close to the west end of the church and from the windows of the Prior's Lodgings.

2.27 The wireline (Figure 6.12) and photomontage (Figure 6.14) viewpoint 12 show there would be views of two areas of panels between the trees in fields on the horizon from the north east corner of the Priory precinct. These are relatively modest areas of panels seen between planting and within broader landscape views.

2.28 From within the Priory complex, near the west end of the church and from the windows of the Prior's lodgings smaller glimpses of the panels maybe visible. These have not been modelled but given the position lower in the valley these are likely to be less visible from here.

2.29 Under Scenario A the overhead line would bring c.7 new pylons with a particular cluster at the point in the line closest to the Priory, numbering c.4. These would be particularly prominent as they puncture the skyline and the close grouping increases their visibility.

2.30 The pylons would be most visible from the high ground in the north east corner of the precinct but sections of the line are also visible from around the heart of the priory complex. There are views from the west end of the church and Prior's Lodgings and the Lodging windows on the first floor. The views are of a shorter section of line but include the area where the new pylons would form a cluster. There are some views from within the cloister of the existing pylons, although just of the upper section.

2.31 The proposals would result in a moderate level of harm and scale of effect, higher than that to the Castle because of the closer proximity of the line, and we consider this to be significant in EIA terms. Again we assess this to be higher than that identified in the applicant's assessment. We do not agree that the impact would be of a low/negligible magnitude resulting in a minor adverse impact as set out in the assessment (8.8.42).

Under scenario B the harm would be reduced to a lower level as the pylons would be located further away.

Castle Acre Conservation Area

2.32 'The castle, priory and massive 12th century town defences at Castle Acre offer a rare and powerful impression of the impact of the Norman Conquest on the ownership, government and even the appearance of England,' English Heritage Guidebook page 3).

2.33 The Priory lies at the south western end of the conservation area and the castle to the north east with the planned town between them. Together these form a substantial part of the conservation area. Within this are many other historic buildings, including over 20 listed buildings, streets and sunken lanes, the village green and parish church.

2.34 In view of this, we consider this particular conservation area should be of 'high/national sensitivity' given the outstanding significance of the Castle, Priory and planned Norman town and the way these scheduled monuments 'contribute significantly to Castle Acre's outstanding conservation area' (Conservation Area Character Statement overview 0.1). The matrix assessment places it at medium sensitivity (table 8.1).

2.35 The many of the views from the conservation area are those associated with the Castle and Priory which have been described above. Given the contribution these sites make to the significance of the conservation area and the impact of the proposals on this, we consider there would be some harm the significance of the conservation area in Scenario A. We do not agree this would be negligible as set out in the assessment (8.8.66).

Narford Hall Park (Grade II Registered Park and Garden (NHLE 1000337) Narford Hall NHLE 1342564

2.36 Narford Hall Park is a grade II registered landscape associated with Narford Hall. Given the grade I status of Narford Hall and the contribution to its significance made by the designed landscape we wish to make brief comments on this asset.

2.37 The Hall is a country house dating from around 1700 which was significantly enlarged c1830 with its distinctive tower. A formal landscape was laid out in the early eighteenth century which included a long avenue extending to the south and ending in a classical arch. Although the landscape was gradually deformalized over the 18th century in line with changing fashions, the long south avenue has been retained.

2.38 The southern end of the avenue lies close to the development site where the panels would be positioned. The views of the development have not been assessed from the registered landscape itself.

2.39 However, the assessment notes that the solar panels may be visible from the avenue. If this is the case, this would erode the rural setting which contributes to the character of Narford Hall as a country house within a designed landscape in a rural setting.

2.40 This would result in some harm of a low level to the registered landscape and the Hall.

Palgrave deserted medieval village (NHLE 1019668)

2.41 This scheduled monument comprises two areas of earthworks to the west and south of Great Palgrave. The site lies some distance to the east of the proposed development.

2.42 Viewpoint 8 is taken from the road a little further to the west of the sites. While the panels would be visible in these views, they would be some distance from the monument. We concur with the assessment that the harm to the significance of the monument would be negligible (8.8.60).

St George's Church South Acre (NHLE 1306357)

2.43 The medieval church of St. George lies to the south of South Acre Road. The church yard is well planted and we concur with the applicant's assessment that Scenario A would have a low impact on its significant. Scenario B would reduce the harm further.

3. Environmental Statement Comments by Chapter

Chapter 5: The Scheme

3.1 5.2.1 outlines the elements needed for the proposed development. Several of these elements would require excavation and could impact below ground archaeology.

3.2 Table 5-1 outlines the Scheme Parameters for different elements and includes details of the below ground impacts. For example, the solar panels would be secured via metal posts driven or screwed into the ground to a depth of up to 4m or anchored using concrete feet. Any below-ground archaeology present in these areas would be impacted by the proposed development.

3.3 Some elements of the scheme would require foundations, such as the Integrated Conversion Units, the Standalone Conversion Units, the Customer Substation, the National Grid Substation, the BESS. This may relate to a concrete slab or plinth and the use of aggregate layers. This work would require excavation, which could impact below ground archaeology present in these areas (Table 5-1).

3.4 It is stated in Table 5-1 that the Customer Substation, National Grid Substation and the BESS may also utilise piled foundations up to 15m in depth. We would recommend that the Historic England document '*Piling and Archaeology*' (2019) is referred to and the impact that the piles may have on archaeological remains and deposits is considered: https://historicengland.org.uk/images-books/publications/piling-and-archaeology/.

3.5 Table 5-1 outlines the below ground impact of the cable corridors, both in terms of the open-trench and HDD installation approaches. The open cut trenches could have a below ground impact of up to 2m, and the HDD could reach an assumed maximum depth of 15m below ground level. Both of the installation approaches have the potential to impact buried archaeological remains and this would need to be considered as part of the proposed development.

3.6 5.3.6 states that the metal mounting frames would be pile driven or screw mounted into the ground to a maximum depth of 4m. We would recommend that the Historic England document '*Piling and Archaeology*' (2019) is referred to and the impact that the piles may have on archaeological remains and deposits is considered: https://historicengland.org.uk/images-books/publications/piling-and-archaeology/.

3.7 5.3.51 states that horizontal directional drilling may be required to install cables in parts of the proposed scheme area. We would recommend that the potential impacts of issues such as bentonite slurry outbreak on archaeological remains is considered. For example, bentonite slurry outbreak could result in physical damage to archaeological remains or it could result in a change in the conditions of an archaeological site that may result in the degradation of fragile remains.

3.8 5.3.53 summarises the installation of joint bays that will link sections of underground cables. It is noted that the joint bays would be approximately 10m long, 6m wide and approximately 3m deep. The installation of these elements could therefore impact any below ground heritage located in these areas.

3.9 5.3.75 proposes new planting as part of the ecological mitigation works. This could include the creation of new woodland blocks and new tree planting. It should be noted that the choice of species of plants/trees should be carefully considered, as roots can impact buried archaeological remains. For example, the Oxford Archaeology report 'Assessing the Impact of Tree Roots on Archaeology' (2024) highlights how the root structures of different tree species could impact archaeological remains: https://knowledge.oxfordarchaeology.com/library/12564.

3.10 5.4.5 summarises the installation of the new pylons that are proposed, but information is needed about the foundations and therefore the potential impact to buried archaeological remains.

Chapter 8: Cultural Heritage & Archaeology

3.11 8.5.5 states that prior to the implementation of any mitigation (embedded or additional), the Scheme has the potential to effect heritage receptors during the construction, operational and decommissioning phases.

3.12 Chapter 8 includes a reference to the Regional Research Framework for the East of England but refers to an older version. The latest version was released in 2021 and can be found online: https://researchframeworks.org/eoe/.

3.13 8.7.0 states that likely environmental effects have been or will be avoided, minimised, mitigated or reduced through design measures and/or management of the Scheme. This includes embedded mitigation being incorporated into the Scheme's construction phase (Section 8.7.1). For example, traffic routes would be controlled to avoid additional traffic movements past sensitive monuments (Section 8.7.2) and the location of temporary construction compounds away from areas of known archaeological remains (Section 8.7.3).

3.14 8.8.12 states that direct impacts to archaeological assets within the Order Limits would largely occur during the construction phase. It is further noted that the Customer Substation, National Grid Substation and the BESS will likely result in total destruction of archaeological remains within their footprint.

3.15 It is noted that the cabling installed in open-cut trenching up to 2m deep. The Trial Trench Evaluation established the depth of the archaeological horizon ranges from 0.2m to 0.8m and so will be sensitive the impacts of the proposed development.

3.16 Section 8.9 outlines the additional mitigation measures that would be implemented. It is stated that this would be secured through the Outline Archaeological Mitigation Strategy (Section 8.9.1). However, the precise layout of aspects of the scheme are not yet available and so the details of the areas of the mitigation cannot yet be determined. This information needs to be provided as soon as it is available to ensure that appropriate mitigation is being applied to each area.

3.17 The proposed mitigation would include geophysical survey (magnetometry) of areas that were previously inaccessible (Section 8.9.2), informative trenching in areas not subject to previous trenching (Section 8.9.4), geoarchaeological assessment for areas of deep impact (Section 8.9.5), archaeological excavation (Section 8.9.6), archaeological monitoring (Section 8.9.9) and preservation (Section 8.9.10). These approaches are what we would expect to see as part of a mitigation strategy.

3.18 It is noted that embedded mitigation would be used to mitigate impact upon buried archaeology through the use of concrete blocks as ballast, avoiding the need for piles and minimising the ground disturbance. We would recommend that issues such as compaction are considered as this could result in physical damage to vulnerable archaeological remains, or changes to the preservation of an archaeological site.

Chapter 12: Water Resources

3.19 Issues of potential chemical pollution are discussed in Chapter 12. It should be noted that pollution of an archaeological site could impact the ability of materials to be assessed using techniques such as radiocarbon dating or the study of ancient DNA. In addition, contamination may make sites inaccessible due to health and safety issues which may rule out any further archaeological assessments. We would recommend that the Historic England document 'Land Contamination and Archaeology' (2017) is referred to:

https://historicengland.org.uk/images-books/publications/land-contamination-and-archaeology/.

3.20 Issues such as changes to ground water flow and compaction of soils have also been discussed within Chapter 12. 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. This could result in the degradation and/or loss of vulnerable remains, particularly organic remains that may be preserved through waterlogging. We would recommend that the Historic England document '*Preserving Archaeological Remains*' (2016) is referred to, and the impacts that this issue may have on archaeological remains are considered: https://historicengland.org.uk/images-books/publications/preserving-archaeological-remains/.

Appendix 8.3: Archaeological DBA

3.21 The Desk-based Assessment (DBA) concludes that there is potential for archaeological evidence to be present dating from the prehistoric to the modern periods within the Order Limits. The proposed development therefore has potential to impact upon these features, remains and deposits (Section 7.4).

3.22 It is noted that the discussion of the archaeology focuses entirely on structures, features and finds. It does not discuss the palaeoenvironmental potential which should also be considered.

Appendix 8.4: Geophysical Survey Report

3.23 Section 4.5 states that there was low magnetic contrast between the sandy Breckland soils and the bedrock. There is therefore the possibility that the archaeological remains may be more extensive than recorded by the survey. This needs to be considered carefully as this could result in risks to the project timetable if unexpected remains are discovered.

Appendix 8.6: Archaeological Trial Trenching report

Appendix B.1: Metalwork

3.24 The discussion section does not mention the need for any further analytical work on the remains (e.g. X-radiography) or conservation requirements.

Appendix B.8: Glass

3.25 The discussion section does not mention the need for any further analytical work on the remains or conservation requirements.

Appendix 8.7: Outline Archaeological Mitigation Strategy (AMS)

3.26 It is stated in this document that WSIs would be produced post-consent that would be in line with the Archaeological Mitigation Strategy. It would be useful if Historic England are consulted on the WSIs, particularly the Science Advisor for

the East of England (Zoe Outram) to review aspects such as the sampling strategies.

3.27 The development of a robust and precise chronology is required to address a number of the research questions proposed for the project (Section 2.3). We would recommend that the value of developing the chronology within a Bayesian framework is considered, and that this is discussed with a specialist. This could help determine the sort of questions that can be addressed with the material/features that can be sampled.

3.28 3.2 states that additional geophysical survey work would be carried out for the areas that were previously not available for survey. It should be stated if the WSI produced for the previous geophysical survey would be used or if a separate document would be prepared. If the existing WSI would be utilised, a reference to the document should be included here.

3.29 3.4 states that additional informative trenching would be carried out for the areas that were previously not available/accessible. It should be stated if the WSI produced for the previous trenching would be used or if a separate document would be prepared. If the existing WSI would be utilised, a reference to the document should be included here.

3.30 3.5 states that the location of deep impacts of the proposed scheme are not yet know, and so it is not possible to firmly identify the need for and location of any geoarchaeological assessment. It is noted that a scope for any geoarchaeological assessment would be agreed with NHES, but we would recommend that details of the sort of work that may be carried out should be included in this document. Additional detail can be included in the subsequent WSIs but it is important to acknowledge the overall approach in this document, as this would form the foundation of later strategies. This information is needed so it is clear how this work would proceed, but also to outline what is expected of the contracting unit(s) responsible for excavating the sites.

3.31 The potential geoarchaeological work should be carried out with reference to the Historic England documents Geoarchaeology (2015, https://historicengland.org.uk/images-books/publications/geoarchaeology-earth-sciences-to-understand-archaeological-record/) and Deposit Modelling and Archaeology (2020, https://historicengland.org.uk/images-books/publications/deposit-modelling-and-archaeology/). Details should be included about the sort of approaches that may be utilised (auger surveys, boreholes etc.) and the equipment that may be required (handheld equipment, borehole rigs etc.).

3.32 3.10 outlines the approach to the preservation of archaeological sites/remains. We would recommend that the Historic England document ‘Preserving Archaeological Remains’ (2016) is referred to, to ensure that the preservation strategy is appropriate for the site and the specific archaeological remains in question: https://historicengland.org.uk/images-books/publications/preserving-archaeological-remains/.

3.33 There is no mention that environmental samples would be recovered in the Intrusive Fieldwork sections (Section 4.8-4.15). This needs to be included so it is clear what work is expected by the contracting unit(s).

3.34 4.12 states that structures or industrial features would be fully (100%) excavated. We would recommend that the potential for fired features, such as hearths, kilns, ovens and furnaces to be dated using techniques such as archaeomagnetic dating is considered before they are excavated. Archaeomagnetic dating requires the collection of *in situ* samples, and so any excavation could remove suitable material from the feature. The potential of the features should be discussed with a relevant specialist, which could include the Historic England Science Advisor for the East of England, Zoe Outram.

3.35 4.20 states that archaeological monitoring may be suspended if remains of negligible archaeological potential are demonstrated to be present. Can it be confirmed that strategies would also be adjusted if remains of higher potential and significance are identified during the monitoring works?

3.36 Sections 4.28-4.31 discuss the palaeoenvironmental sampling strategy. It should be noted that a revised version of the Historic England document 'Environmental Archaeology' (2025) was recently released: https://historicengland.org.uk/images-books/publications/environmental-archaeology-3rd/. This document should be referred to in this section.

3.37 The sampling strategy should address specific questions posed by the project. This section therefore needs to include the aims and objectives of the proposed work, considering the nature and range of biological remains present, the possible variations in preservation, the differential distribution of remains (both vertically and horizontally) and the significance of these remains in a local, regional and national context. The strategy should also make provisions for specialists to visit the sites to support the sampling programme.

3.38 Different levels of investigations are discussed within the Archaeological Mitigation Strategy, including monitoring, informative trenching and excavation. The sampling strategies need to be developed to address these different types of investigation. For example, the strategy developed for the excavation phase would build on the findings of the informative trenching phase and potentially address more targeted questions. In its current form, the document does not discuss the findings of the previous work, or state how this information has been used to guide the excavation and sampling strategy.

3.39 Specific sampling strategies should also be developed for some features and remains. For example, industrial structures and remains, human remains and occupation surfaces. These features and remains may require spatially distinct samples to be recovered, such as sampling the head, torso and feet of an inhumation (see The Role of the Human Osteologist in Archaeological Fieldwork Projects, Historic England 2018: https://historicengland.org.uk/images-books/publications/role-of-human-osteologist-in-archaeological-fieldwork-project/). Specific sampling approaches

may also be required, such as physical or chemical techniques to investigate industrial features or occupation surfaces.

3.36 It is stated that human remains would only be removed from site in exceptional circumstances. It should be noted that the Historic England document 'The Role of the Human Osteologist in Archaeological Fieldwork Projects' (2018) states that thorough evaluation normally requires the excavation of burials to the base of the archaeological sequence within the trenches. This is necessary to fully understand the nature, scale, date-range and preservation of the archaeological deposits, and to understand the significance of the archaeology and the risks associated with the proposed development: https://historicengland.org.uk/images-books/publications/role-of-human-osteologist-in-archaeological-fieldwork-project/.

3.37 As stated above, we would recommend that a specific sampling strategy is developed for the investigation of human remains (inhumations and cremations) to ensure that opportunities to maximise the information recovered are not missed.

3.38 Section 4.36 outlines the scientific dating strategy. It was noted in that many of the research questions highlighted in Section 2.3 require the development of a robust and precise chronology. We would recommend that the Historic England document 'Radiocarbon Dating and Chronological Modelling' (2023) is referred to: https://historicengland.org.uk/images-books/publications/radiocarbon-dating-chronological-modelling.

3.39 We would also recommend that the value of developing the chronology within a Bayesian framework is considered as this would help determine the sort of precision that may be available in the resulting chronology, the number of scientific dates that may need to be produced and the sort of questions that can be addressed.

3.40 It is stated in Section 4.37 that all artefacts would be cleaned as standard. We would recommend that the cleaning of items is considered on a case-by-case basis to ensure that opportunities to sample materials are maximised. For example, cleaning may damage and/or remove organic residues that may be present (see the Historic England guidance 'Organic Residue Analysis and Archaeology' (2017): https://historicengland.org.uk/images-books/publications/organic-residue-analysis-and-archaeology/).

3.41 4.46 provides an outline of the resulting reports produced for the informative trenching work. We would recommend that the potential of each class of remains is discussed within the report, as well as the recommendations for further work. This information is needed to help guide the strategy for any further excavation work, including the sampling strategies.

3.42 Section 6 states that the Archaeological Contractor would be a CIFA Registered Archaeological Organisation, but it would be useful to state if the appointed contractor would be responsible for producing the Site Specific WSIs in line

with the Archaeological Mitigation Strategy. This should include details of the specialists that would be utilised.

4. Comments on draft DCO Order, Outline Management Plans and Strategy Documents

Draft Development Consent Order [APP-018]

4.1 Historic England welcomes inclusion of Requirements 12 within the wording of the draft DCO which are related to archaeological mitigation.

4.2 We have proposed some changes to the draft AMS which is referenced in the DCO requirement and recommend the document is revised and any revisions are agreed and concluded with Historic England prior to the works commencing

5. Policy considerations

5.1 The relevant National Policy Statements (NPS) are in this case overarching NPS for Energy (EN-1), NPS for Renewable Energy Infrastructure (EN-3), and NPS for Electricity Networks Infrastructure (EN-5). The National Planning Policy Framework is also relevant.

5.2 Approach to the historic environment is considered in and Overarching NPS for Energy (EN-1), and specifically Section 5.9. Historic Environment. This mirrors the NPPF and specially includes general historic environment paragraphs as well as sections that cover Applicant Assessment, Mitigation and the role of the Secretary of State in decision making. We have not flagged every policy; however, we would like to draw attention to the following.

5.3 EN-1 5.9.25 which says the '…Secretary of State should consider the desirability of sustaining and, where appropriate, enhancing the significance of heritage assets, the contribution of their settings and the positive contribution that their conservation can make to sustainable communities, including to their quality of life, their economic vitality, and to the public's enjoyment of these assets.

5.4 EN-1 para 5.9.27 which states that: 'When considering the impact of a proposed development on the significance of a designated heritage asset, the Secretary of State should give great weight to the asset's conservation. The more important the asset, the greater the weight should be. This is irrespective of whether any potential harm amounts to substantial harm, total loss, or less than substantial harm to its significance.'

5.5 EN 1 para 5.9.28 which states that: 'The Secretary of State should give considerable importance and weight to the desirability of preserving all heritage assets. Any harm or loss of significance of a designated heritage asset (from its alteration or destruction, or from development within its setting) should require clear and convincing justification.'

5.6 EN-1 para 5.9.32 also states that '…Where the proposed development will lead to less than substantial harm to the significance of the designated heritage asset, this harm should be weighed against the public benefits of the proposal, including, where appropriate securing its optimum viable use.'

5.7 Again para 5.9.33 notes that in weighing applications that directly or indirectly affecting non-designated heritage assets, a 'balanced judgement' will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

5.8 And para 5.9.36: 'When considering applications for development affecting the setting of a designated heritage asset, the Secretary of State should give appropriate weight to the desirability of preserving the setting such assets and treat favourably applications that preserve those elements of the setting that make a positive contribution to, or better reveal the significance of, the asset. When considering applications that do not do this, the Secretary of State should give great weight to any negative effects, when weighing them against the wider benefits of the application. The greater the negative impact on the significance of the designated heritage asset, the greater the benefits that will be needed to justify approval'.

5.8 Also, of relevance here would be EN 1 para 5.9.13 which states that: 'The applicant is encouraged, where opportunities exist, to prepare proposals which can make a positive contribution to the historic environment, and to consider how their scheme takes account of the significance of heritage assets affected.'

5.9 EN-3 para 2.10.111 'As the significance of a heritage asset derives not only from its physical presence but also from its setting, careful consideration should be given to the impact of large-scale solar farms which depending on their scale, design, and prominence, may cause substantial harm to the significance of the asset.'

5.10 The Holford Rules are also relevant given the overhead powerlines. Rule 2: 'Avoid smaller areas of high amenity value, or scientific interests by deviation; provided that this can be done without using too many angle towers, ie the more massive structures which are used when lines change direction. - Where possible choose routes which minimise the effects on the setting of areas of architectural, historic and archaeological interest including Conservation Areas, Listed Buildings, Listed Parks and Gardens and Ancient Monuments.'

6. Historic England Written Representation: Conclusions

6.1 Historic England's primary concern is the impact of the development on the designated heritage assets at Castle Acre: the Castle, Priory and conservation area.

6.2 The development lies to the south of Castle Acre and much of it would be screened from views by Bartholomew Hill Plantation and by the topography which slopes down towards Swaffham.

6.3 The amendments to the scheme since the PIER have helped considerably to reduce the impact of the proposals with the relocation of the BESS, substations and some panels.

6.4 However, elements of the scheme remain visible from these highly significant heritage assets, the Castle and Priory. These would erode the rural character of the landscape which contributes to their significance.

6.5 These sites survive cumulatively as a remarkable record of a significant transition in the history of England and illustrate aspects of society in this period and into the medieval era. The Castle and Priory are highly evocative in this way, and the rural landscape plays a large part in reinforcing their interest.

6.6 The impact of the development would result in a moderate level of harm to the significance of the Castle and the Priory, the harm to the Priory being higher because of its closer proximity to the development. There would be a low level of harm to the conservation area.

6.7 We have discussed mitigation and the applicant has advised that it is not possible to offer further mitigation through planting to reduce the impact of panels. However, given the way the existing planting helps with screening views in the photomontages, this might be revisited.

6.8 Much of the harm is however derived from the overhead line and the doubling of the lines in Scenario A. Given its height, it is not possible to mitigate this through planting. It is not proposed to remove the additional line after decommissioning which would result in a permanent impact.

6.9 Mitigation could however be offered through Scenario B which would reduce the level of harm.

6.10 We therefore strongly recommend Option B is taken forward in line with the Holford Rules. Rule 2 is to avoid smaller areas of high amenity value – where possible choosing routes which minimise the effects on the setting of architectural, historic and archaeological interest including conservation areas, listed buildings, listed parks and gardens and ancient monuments.

6.11 Any consent should also require the proposed maintenance and strengthening of the planting which screens and filters the impact of the development, in particular that at Bartholomew’s Hill Plantation.