

EXAMINING AUTHORITY FOR THE DROVES SOLAR FARM (EN0110013)

SUBMISSION FOR DEADLINE 2 (19 JUNE 2026)

DOCUMENT: Written Representation by a member of Castle Acre Parish Council. [REDACTED]

SUBMITTED BY: Castle Acre Parish Council.

STATUS: Member of Castle Acre Parish Council

ADDRESS/LOCATION: Castle Acre / Swaffham area, Norfolk

This representation contains comments, observations and queries for the applicant to address before this application can be considered acceptable under the National Policy Statements (NPS EN-1 and NPS EN-3).

Chapter 8: Cultural Heritage and Archaeology Prepared by: GHC Heritage Date: November 2025 PINS reference: EN0110013 Document reference: APP/6.2 (Original) APFP Regulation Reg 5(2)(a) Planning Act 2008 Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009.

Comments on particular sections from [REDACTED], Castle Acre Parish Council.

Please note: each section is quoted in full; then the referenced text is in **italics** and [REDACTED] comments and queries are prefixed **AM**.

8.6.8 Castle Acre and its castle are situated in an east to west orientated valley. The wider setting of the village and the monument is decidedly agricultural in character, with small pastures occupying much of the immediate environs and larger arable fields encompassing the more distant, higher ground. The slightly elevated position of the castle at the eastern extent of the settlement allows the monument to maintain a prominent position within the village, allowing for long-reaching views of these agricultural surroundings. The topography of the valley in which Castle Acre is nestled directs views to the east and west in particular, with later buildings and mature trees further channelling these outlooks. The situation of Castle Acre Castle at this highly defensible elevated position is a key aspect of the strategy behind its intentional design and views illustrating this have remained largely uninterrupted. These elements provide a key contribution to the setting of the heritage asset and aids in the understanding and appreciation of the monument's significance.

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AM These view should remain uninterrupted as they are highly significant in terms of the historic landscape.

8.6.9 The setting of Castle Acre Castle on a slightly elevated position at the eastern extent of Castle Acre settlement, with a clear visual connection with medieval structures surviving within the village as well as the surrounding countryside, serves as a visual representation behind some of the reasonings behind the castle's intentional design and siting at this location and aids the aesthetic value of the monument. In these ways, the setting provides some contribution to its significance. However, as a relatively rare example of a surviving Shell Keep castle of 12th century date, connected with several notable medieval events and persons, the castle would still hold a high level of significance if removed from this setting.

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AM An ambiguous statement – the castle is not being physically removed from its site but the setting is an intrinsic and holistic part of its location.

8.6.10 The Site is situated to the south of Castle Acre Castle and forms part of the largely arable landscape occupying the distant, higher ground to the south of the monument and the village. These agricultural surroundings form part of the wider setting of the monument, but it is the topography that largely serves as an illustration of part of the reasoning behind the castle's siting in this location, being a highly defensible position with wide-reaching views across the valley

The Site is situated to the south of Castle Acre Castle and forms part of the largely arable landscape occupying the distant, higher ground to the south of the monument and the village. These agricultural surroundings form part of the wider setting of the monument

AM This has been an arable landscape as recorded in the Domesday Book 1086, with the 'Acre entry' referencing the Saxon land management. South Acre had land for six ploughs, meadow and woodland while Castle Acre had twelve plough teams, meadow and woodland.

8.6.11 The majority of the Site is visually isolated from the castle by topography, extensive mature plantations and hedged boundaries between the two. Due to this, there is very little intervisibility between Castle Acre Castle and the study site at ground level. Only three fields out of the total 34 that encompass the Site are visible from the castle and vice versa (see ES Appendix 8.2: Stage 2 and Stage 2 Setting Assessment [APP/6.4], Figure 8). All three are located at a considerable distance from the monument and make up a very small section of the wider vista available from the castle. They are not located within any of the key views to or from the castle, which are particularly directed to the east and west, which contribute to or demonstrate its significance. Indeed, views towards the Site from the castle are already scattered with wind turbines, pylons, large silos and pig farms, all of which have had a negligible influence on the castle's significance or ability to appreciate said significance.

Indeed, views towards the Site from the castle are already scattered with wind turbines, pylons, large silos and pig farms, all of which have had a negligible influence on the castle's significance or ability to appreciate said significance.

AM 'A negligible influence' is a subjective judgement. Have the opinions of residents and visitors been sought before making this statement?

To state that 'views towards the Site from the castle are already scattered with wind turbines, pylons, large silos and pig farms' is not an argument for further intrusive features resulting from the solar farm.

Pig farms occupy land temporarily and they are agricultural. The infrastructure of the solar farm is of an unacceptable scale that imposes industrialisation on a rural and historic landscape.

8.6.15 The wider landscape surrounding the priory is predominantly agricultural in character, with smaller areas of pasture in the foreground and larger arable fields on the more distant higher ground visible to the east, north and south. Views are particularly channelled along an east to west valley in which the priory and village are sited. The priory was designed as a visually impressive, intricate and imposing series of structures highly visible within this wider setting, with long-reaching views afforded of the buildings from much of the surrounding landscape.

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AM The significance of the Nar Valley as a medieval pilgrimage route has not been addressed.

The Priory at Castle Acre is one of six religious houses sited along the Nar Valley and these were all visited by pilgrims travelling to the medieval shrine at Walsingham, the second most important religious centre, after Canterbury

Pilgrims came by ship to King's Lynn; visited the Red Mount Chapel there and then took the route through the Nar Valley, past the chapel dedicated to Thomas a Becket and past South Acre Church, to the Priory at Castle Acre where they could worship the relic of the arm of St Philip.

It is no coincidence that Castle Acre Church is dedicated to St James the Great of Compostella whose shrine was, and still is, one of the most important Catholic pilgrim destinations.

The present-day Nar Valley Way is a direct legacy of the medieval pilgrim route.

8.6.17 The Site is situated at some distance to the south of the priory and shares very minimal intervisibility (ES Appendix 8.2: Stage 1 and Stage 2 Setting Assessment [APP/6.4], Figure 9). It is a small part of the agricultural surroundings of Castle Acre Priory that forms part of its wider setting. The majority of the Site is shielded behind dense tall planting and topography that restricts, and in most places totally obscures, any views from the priory and vice versa. However, there are limited views between the priory and Fields 35, 36 and 38, and heavily filtered views of Fields 12, 13 and 25 and 21 of the Site from the northern part of the priory (though not from the principal buildings of the priory closer to the valley bottom). The visibility of small parts of the Site from the priory merely form a small part of much wider vistas and do not contain any distinguishing features that could be said to add to the significance of the monument.

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AM They may not have 'any distinguishing features' adding to the 'significance' but the understated rural nature of the landscape is what contributes to its charm and tranquillity.

8.6.19 The significance of the Church of St George is largely vested in its architectural, archaeological and historic interest as a much-restored church of medieval origin. It features a range of architectural styles although it is primarily of a Gothic style with later Perpendicular additions and is built in the local vernacular style of flint construction with ashlar dressings. The Church of St George is an aesthetically pleasing building in its scale, form and traditional materials set within the green space of its historic plot, which also provides a contribution to its architectural interest.

a ... much restored church

AM The Norfolk Historic Environment Record (NHER 4126) states: *Unusually, the church seems largely to have escaped restoration in the 19th century.*

8.6.22 Both the church and the village in which it is sited are positioned within a valley orientated east to west with the River Nar situated to the north, dividing this parish from that of Castle Acre. Surrounding the church along the valley to the east and west, and on higher ground to the south is widespread agricultural land mostly comprising broad arable fields, substantial pig farms and smaller areas for pasture.

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AM This land has been arable and pasture since Saxon times. The medieval church was sited in the context of this agricultural landscape which will be destroyed by the solar farm.

8.6.44 The setting of Castle Acre is predominantly agricultural in character, with large arable fields spreading into the distant landscape beyond the village, and smaller areas of pasture fields immediately adjacent. Castle Acre is prominent in this landscape and has a clear skyline, particularly of the castle, priory and St James church, visible from this wide-reaching rural landscape beyond the village limits.

Castle Acre is prominent in this landscape and has a clear skyline, particularly of the castle, priory and St James church, visible from this wider reaching rural landscape beyond the village limits.

AM It is precisely this skyline, especially when approaching along the A1065 from the south, which is a unique feature of Norfolk's and indeed East Anglia's landscape. Additional pylons; the substation and the solar farm itself will negatively intrude upon this skyline as alien infrastructure.

8.6.45 The Site is situated to the south-west of the Conservation Area and forms part of the larger arable fields in the distant higher ground forming part of the Conservation Area's wider setting. There are some views between the Conservation Area, particularly from the prominent structures of the village's skyline including the priory, castle and St James church, and the north-western most fields of the Site. However, these views tend to be partial, filtered or oblique.

However, these views tend to be partial, filtered or oblique.

AM That these views are not more spectacular should not be seen as a criticism and dismissive of their charm.

South Acre Conservation Area

8.6.46 South Acre Conservation Area (immediately north of the Site) is an asset of medium sensitivity.

8.6.47 The significance of South Acre Conservation Area is predominantly vested in its architectural interest, and specifically the group of historic buildings that comprise the village centre. These include the Grade I Listed Church of St George and the Grade II Listed South Acre Hall, amongst a small collection of historic farmhouses and agricultural buildings. The level of preservation of historic fabric at the centre of South Acre combined with the very low proportion of modern construction has allowed it to retain a great sense of comprehensiveness despite much of the village having all but disappeared over the course of the post-medieval and modern periods.

8.6.48 South Acre is situated in the Nar Valley, a prominent east to west aligned valley that slopes steeply on the northern side towards the river, which Nar itself, which is situated c.480m north of the village. The historic settlement core, clustered around the Church of St George, is nestled into the valley and, with the numerous mature trees and hedgerows throughout the settlement, sits harmoniously in the landscape with only the church tower visible from the surrounding area.

8.6.49 South Acre is a rural settlement, and its environs are dominated by farmland, mostly arable with some smaller areas of pasture. There are frequent plantations of varying sizes interspersed between these fields and many of the boundaries are formed of mature tree lines and hedgerows. This countryside location forms the setting of the village and emphasises its rural, traditional character.

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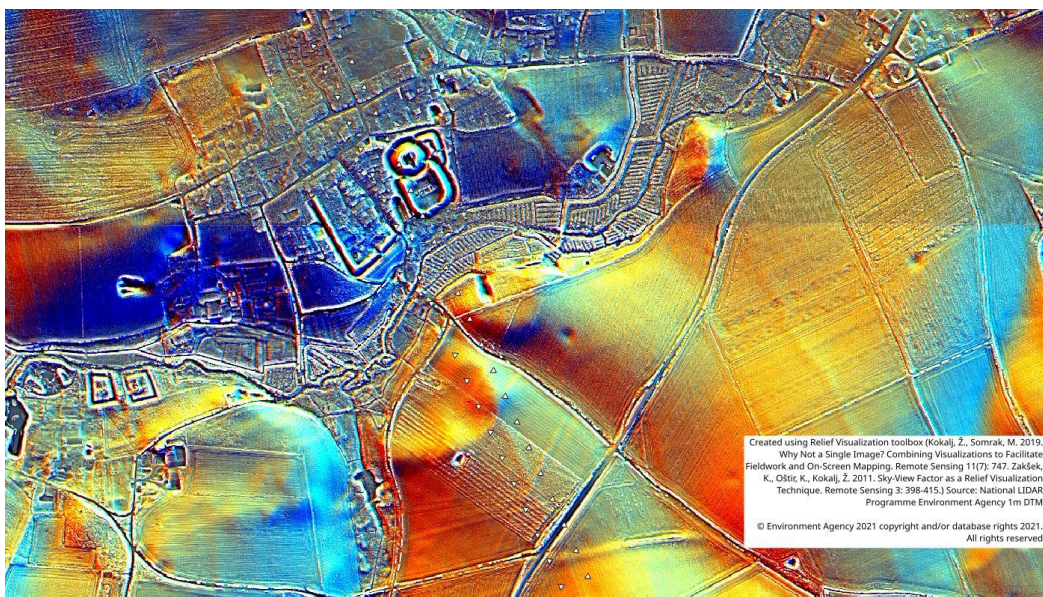
AM These three statements actually support the argument that the area proposed for The Drovers is totally unsuitable, as it would impact negatively on the visual; environmental, agricultural and historic aspects of the landscape.

8.6.60 The projected route of the Fen Causeway, a potentially Roman road thought to have prehistoric origins (although this has recently been called into question), is recorded by the HER as extending into the western part of the Site followed by the current route of The Drovers Solar Farm – Environmental Statement Volume 2, Chapter 8: Cultural Heritage and Archaeology Document Reference: APP/6.2 21 PINS Reference: EN0110013 Fincham Drove.

A second Roman road, the Peddars Way, is purported to extend c.1km to the east of the Site on a perpendicular alignment (orientated north-west to south-east) to the Fen Causeway.

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AM LIDAR imagery (Environment Agency) evidences this alignment:



Dotted parallel white lines centre of image show original route of the Peddars Way.

8.6.65 The purported route of the Fen Causeway (followed by Fincham Drove) crosses the Site and the geophysical survey identified a possible area of activity to the north (Field 9) closely aligned to the drove way. However, enclosures which could be Roman in origin (on morphological grounds) further to the east within Fields 15 and 23 do not align with the drove way and there is no indication of any continuation of the drove way (or earlier track/road) to the east of where the current drove turns to the north. The purported date of this feature as Roman has, therefore, been called into question, and these features hold substantial potential to elucidate this.

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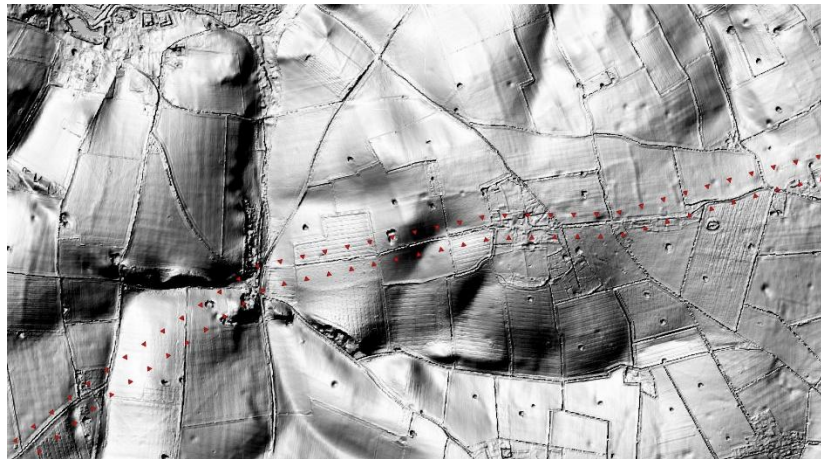
AM From the Norfolk Heritage Explorer:

The Fen Causeway(NHER 2796) is the name given to the Roman road which runs from a junction with Ermine Street and King Street near Peterborough across the

Cambridgeshire and Norfolk fens. In Norfolk, the Fen Causeway runs between Upwell and Denver, but in places there is more than one possible route. East of Denver, the road then probably divides into two, with one route heading due east to the Roman town of Venta Icenorum at Caistor St Edmund (NHER 9786) and the other heading northeast towards the Roman town at Brampton (NHER 1006 and 1124).

AM From Fincham eastwards, the route is known as Fincham Drive.

As evidence for Fincham Drive being Roman, there is a distinct agger 21 feet wide between small ditches, can be clearly seen continuing the same line diagonally through the corner of Long Plantation. The present main road through Stradsett is on the line of Fincham Drive; the placename 'Stradsett' comes from the Roman 'Strata' a street or routeway.



Route of Fincham Drive, west – east crossing of A1065 and beyond. EA LIDAR.

Archaeological Remains – Direct Impacts

8.8.12 Impacts to archaeological assets within the Order limits would largely occur during the construction phase through activities such as the installation of Solar PV Arrays, BESS, Customer Substation, National Grid Substation, Cabling, Access Tracks, and Temporary Construction Compounds, which all have the potential to have an adverse, permanent, and irreversible impact upon buried archaeology.

8.8.13 The Customer Substation, National Grid Substation, and the BESS will likely result in total destruction of archaeological remains within their footprint

Designated and Non-Designated Heritage Assets – Indirect Impacts

8.8.20 During the construction phase there is potential for indirect impacts to heritage assets within the Study Area and beyond the boundary of the Site through changes to their setting. These changes would be most evident during the operational phase and would commence during construction but are most closely linked to the operational phase and indirect impacts that might occur during the construction phase would be of no greater magnitude than those experienced during the operational phase and would be of a short term duration and reversible. They would, however, be of a different nature, for example including the possible visibility of plant and the presence of Temporary Construction Compounds. These might result in very localised indirect impacts that could be of a different nature than what would occur during the operational phase, but the reversibility and short-term duration of these impacts would mean that the scale of the effects would soon return to Neutral.

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8.8.13 The Customer Substation, National Grid Substation, and the BESS will likely result in total destruction of archaeological remains within their footprint.

AM It is unacceptable in terms of its heritage value that the buried archaeology will be adversely affected. Wilfully destroying evidence of the past is morally wrong and denies present and future generations the opportunity to add to knowledge of our history.

Operational Phase Archaeological Remains – Direct Impacts

8.8.23 Any adverse impacts to the archaeological resource will have taken place during the construction phase, with the bulk of the archaeological resource being preserved in situ. The impacts to buried archaeological features during the operational phase would, therefore, be of a beneficial nature, due to these remains being taken out of the agricultural cycle of regular ploughing which most of the field parcels within the Site are currently subject to. Ploughing is recognised as having a widespread detrimental impact upon archaeological remains. Therefore, archaeological remains of low sensitivity (as indicated by the informative trial trenching to be present within the Site), subject to a low beneficial magnitude of impact would result in a Minor Beneficial effect, which is not significant in EIA term.

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AM Whilst deep ploughing is still undertaken in Norfolk, the shift is towards reduced tillage (min-till) or direct strip-seeding systems to conserve soil ecology and reduce carbon loss so there is less of a threat to buried archaeological remains. There can be no compensatory measures that mitigate destruction of buried archaeology as stated above 8.8.12. and 8.8.13.

Designated and Non-Designated Heritage Assets – Indirect Impact

8.8.25 It should be made clear that in assessing heritage assets, in accordance with current guidance, it is the impact upon the significance of the asset as a whole (encompassing all of its values and its entire setting) that is assessed, not the impact upon one particular view from a discrete part of the asset.

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AM It is precisely this impact 'as a whole' which is the basis of the objection of CAPC, based on the opinions and comments of residents.

8.8.35 The wider setting of Castle Acre Castle encompasses some parts of the Site, principally Fields 21, 25, 26, 33, 35, 36, 37, and 38, which are partially visible from the Castle. Those parts of the Site that do not share any intervisibility with the Castle are not considered to make any appreciable contribution to its significance. Fields 35, 36, 37 and 38 will not be subject to any substantive change. Fields 21, 25, 26 and 33 are proposed for solar panels and these will be partially visible from the Castle. Embedded mitigation in the form of additional planting at the north-east corner of Field 12 and northern side of Field 26 along with the enhancement of existing hedgerows along the eastern limit of the Site at the A1065 will reduce this visibility but will not remove it entirely. The resulting intervisibility will, therefore, be filtered and/or partial.

8.8.36 There will be no impact on the majority of the Castle's setting, specifically the elements encompassing the village siting, the visual and spatial connection with the Priory, the connection to the Peddars Way and the vast majority of the surrounding landscape visible from the heritage

asset's elevated position. The majority of views will be unchanged, with only very small elements of the wider Scheme (at least partially screened under the proposals) remaining.

8.8.37 There is some visibility of the Site from the Castle, though this is limited (See ES Appendix 8.2: Stage 1 and Stage 2 Setting Assessment [APP/6.4], Figure 8) and any visibility of the Scheme from the Castle will form a very small part of a much wider vista. As such, it is not considered that areas of the Solar PV Site would dominate or intrude into such views, but would be visible. Whilst the visibility of Solar PV Arrays would represent a change in the setting of the Castle, they would not alter any appreciation of the topographic siting of the castle and the vast majority of any vista from the Castle would remain in agricultural use, as such the impact from visible Solar PV Arrays is considered to be negligible. The Grid Connection Infrastructure will be highly visible from the Castle, especially as it punctuates the skyline. Whilst here are already pylons visible in these views, under Scenario A the combined effect of both existing and new pylons will increase their prominence in the landscape, but not to a degree that they may draw the observer's eye away from elements that add to the appreciation of the castle's significance (see ES Chapter 6: Landscape and Visual, Figures 6.14 and 6.15) . Under Scenario B, however, whilst there may be more pylons present than is currently the case they would be located further away from the Castle, reducing their prominence in the landscape. 8.8.38 Conclusion: Under Scenario A, prior to additional mitigation measures being put in place, the impact on Castle Acre Castle, a high sensitivity receptor, would be of low/negligible adverse magnitude of impact resulting in a Minor Adverse effect, which is not significant in EIA terms. Under Scenario B, prior to additional mitigation, the magnitude of impact is negligible, resulting in a Neutral effect, which is not significant.

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8.8.36 The majority of views will be unchanged, with only very small elements of the wider Scheme (at least partially screened under the proposals) remaining.

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AM If, as stated, the 'majority' of the views will be unchanged, there is a minority that will be adversely affected and detract from 'the wider vista'. Such intrusion could be reason enough to refuse planning permission.

Castle Acre Priory

8.8.40 The setting of Castle Acre Priory at the western extent of Castle Acre settlement alongside the river, with a clear visual connection with medieval structures surviving within the village as well as the surrounding countryside, serves as a visual representation behind some of the reasonings behind its intentional design and siting at this location and aids the aesthetic value of the monument. In these ways, the setting provides some contribution to its significance. However, as a grand medieval complex with significant archaeological interest, the priory would still hold a high level of significance if removed from this setting.

However, as a grand medieval complex with significant archaeological interest, the priory would still hold a high level of significance if removed from this setting.

AM As with the Castle, an ambiguous statement – the priory is not being physically removed from its site but the setting is an intrinsic and holistic part of its setting.

8.8.41 The Scheme is situated c.600m to the south of Castle Acre Priory and shares very minimal intervisibility. This is not afforded from the majority of the designated area of the priory but predominantly from a small section of the northern part of the monument or from the adjacent footpath. There is no visibility of the Site from any position near the main priory buildings. The Site

is part of the agricultural surroundings of Castle Acre Priory that forms part of its wider setting. The majority of the Scheme is shielded behind dense tall planting and topography that restricts, and in most places totally obscures, any views from Castle Acre Priory and vice versa. However, there are limited views between parts of Castle Acre Priory (largely limited to the northernmost extent of the Scheduled area, but not from the lower lying ground) and a small part of the Site, comprising parts of Fields 12, 21, 25, 33 and 35. The latter field (35), however, is allocated for mitigation and enhancement under the Scheme. Visibility of the remaining fields will be further screened through landscaping proposals as part of the embedded mitigation, specifically planting at the northern side of Field 26, but there will be partial and filtered views remaining. The visibility of small parts of the Site from the priory merely form a small part of much wider vistas and do not contain any distinguishing features that could be said to add to the significance of the monument. It is not considered that areas of the Solar PV Site would dominate or intrude into such views but would be visible. Whilst the visibility of Solar PV Arrays would represent a change in the setting of Castle Acre Priory, they would not alter any appreciation of the topographic siting of the monument and the vast majority of any vista from the priory would remain in agricultural use, as such the impact from visible Solar PV Arrays is considered to be negligible. The proposed new pylons will be highly visible from Castle Acre Priory, especially as they punctuate the skyline. Whilst there are already pylons visible in these views, under Scenario A the combined effect of both existing and new pylons will increase their prominence in the landscape, but not to a degree that they may draw the observers eye away from elements that add to the appreciation of the priory's significance (see ES Chapter 6: Landscape and Visual, Figures 6.14 and 6.15). Under Scenario B, however, whilst there may be more pylons present than is currently the case they would be located further away from the Priory, reducing their prominence in the landscape.

It is not considered that areas of the Solar PV Site would dominate or intrude into such views but would be visible. Whilst the visibility of Solar PV Arrays would represent a change in the setting of Castle Acre Priory, they would not alter any appreciation of the topographic siting of the monument and the vast majority of any vista from the priory would remain in agricultural use, as such the impact from visible Solar PV Arrays is considered to be negligible.

The proposed new pylons will be highly visible from Castle Acre Priory, especially as they punctuate the skyline. Whilst there are already pylons visible in these views, under Scenario A the combined effect of both existing and new pylons will increase their prominence in the landscape, but not to a degree that they may draw the observers eye away from elements that add to the appreciation of the priory's significance.

AM Where is the evidence for public consultation that the impact from the solar arrays and the new pylons would be 'negligible' ?

There has been one meeting in Castle Acre for residents (12 June 2025; 1.5 hours) to view the initial plans. CAPC had to request this meeting; it was not proposed by the developers.

8.8.66 Conclusion: Prior to additional mitigation, the magnitude of impact on Castle Acre Conservation Area, a medium sensitivity receptor, is considered to be negligible under both Scenarios A and B, resulting in a Neutral effect, which is not significant in EIA.

8.8.73 After decommissioning, several impacts on designated heritage assets resulting from the operational phase of the Scheme would be reversed, specifically the removal of solar arrays and possibility of returning the land to an agricultural function. The exception to this would be the Grid Connection Infrastructure and National Grid Substation, both of which will not be decommissioned and will remain extant.

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AM Once a historic landscape has been destroyed, it cannot be 'reversed'.

The visual and experiential harm caused by the scale and the infrastructure of the proposed solar farm would be not be 'temporary', it will be significant and irreversible, compromising the cultural landscape, the beauty and tranquillity of one of Norfolk's most important heritage clusters.

**██████████
Castle Acre Parish Council
18 June 2026**