



Historic England

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Our ref: PL00797992
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12 February 2025

Dear Mr Jones

Re: EAST PYE SOLAR ENVIRONMENTAL IMPACT ASSESMENT (EIA) SCOPING REPORT

Thank you for your letter of 15 January 2025 consulting us about the above EIA Scoping Report.

This development is likely to have an impact upon designated heritage assets and their settings in the area around the site.¹ In line with the advice in the National Planning Policy Framework (NPPF), we would expect the Environmental Statement to contain a thorough assessment of the likely effects which the proposed development might have upon those elements which contribute to the significance of these assets.

The remit of Historic England to advise the determining authority includes Scheduled Monuments, listed buildings and registered parks and gardens at grade I and II*, and conservation areas.

The Scoping request is accompanied by a detailed document setting out the proposed scope of an Environmental Impact Assessment, Scoping Report (January 2025). This has included a chapter (9) that considers the Cultural Heritage. This provides a list of assets within 1km of the site.

We would draw your attention, in particular, to the following **listed buildings** and **registered parks and gardens**:

- Church of St Catherine, Fritton (grade I, NHLE 1373281)
- Church of St Michael, Long Stratton (grade I, NHLE 1304267)
- Church of St John the Baptist, Morningthorpe (grade I, NHLE 1154001)
- Wacton Hall (grade II*, NHLE 1050822)
- Church of St Peter, Brooke (grade II*, NHLE 1051120)
- Porch House (grade II*, NHLE 1372848)

¹ A Designated Heritage Asset is defined in the National Planning Policy Framework as 'A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation'.



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



- Kirkstead Hall (grade I, NHLE 1170485)
- Church of St Margaret, Kirkstead (grade II*, NHLE 1372852)
- Within Saxlingham, the following listed buildings form part of a group: Church of St Mary the Virgin, Saxlingham (grade II*, NHLE 1050666); the Old Rectory (grade II*, NHLE 1050667) and Old Hall (grade II*, NHLE 1050665)
- Ditchingham Hall (grade I, NHLE 1153041)
- Ditchingham Hall Registered Park & Garden (grade II, NHLE 1000225)

Special attention should furthermore be given to the likely effects on **Conservation Areas**, especially:

- Brooke
- Saxlingham Green
- Hempnall
- Fritton
- Waxton

The likely effects of substations on heritage assets should also be considered within the Environmental Statement's Landscape and Visual Impact Assessment chapter and Cultural Heritage chapter.

The above list is by no means exhaustive as we note that there are also others including grade II listed buildings whose setting may be affected, and which should be included in any impact assessment.

We would also expect the Environmental Statement to consider the potential impacts on non-designated features of historic, architectural, archaeological or artistic interest, since these can also be of national importance and make an important contribution to the character and local distinctiveness of an area and its sense of place. This information is available via the local authority Historic Environment Record (www.heritagegateway.org.uk) and relevant local authority staff.

We would expect the historic environment to be dealt with in a specific chapter within an Environmental Statement, supported by technical information (such as desk-based assessments, ZTVs, archaeological evaluation etc.) included as appendices.

We would strongly recommend that Conservation Officers and the archaeological staff at the County Council and the relevant local planning authorities are involved in the development of this assessment. They are best placed to advise on: local historic environment issues and priorities; how the proposal can be tailored to avoid and minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.

It is important to identify all heritage assets that may be affected on the basis of an appropriately defined study area usually underpinned by a ZTV map (Zone of Theoretical Visibility). This should include heritage assets whose setting may be affected which may be at some distance from the site. It is important that the assessment is designed to ensure that all impacts can be fully understood. Sectional





drawings and techniques such as wireframe and photomontages are a useful part of this.

The assessment should also take account of the potential impact which associated activities (such as construction, servicing and maintenance, and associated traffic) might have upon perceptions, understanding and appreciation of the heritage assets in the area. The assessment should also consider, where appropriate, the likelihood of alterations to drainage patterns that might lead to *in situ* decomposition or destruction of below ground archaeological remains and deposits, and can also lead to subsidence of buildings and monuments.

The setting of a heritage asset is defined in the NPPF as 'the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral'. An assessment of setting should therefore not be limited to visual receptors and must include a consideration of other factors including (but not limited to) the erosion of the historic landscape, how the assets are approached or traversed, the spatial, historical and functional relationship of assets to one another and the wider historic landscape, as well as the impact of receptors such as noise, light and traffic movements etc.

The EIA should aim to define the setting of each of the heritage assets and the contribution which different elements of that setting make to the asset's significance. This would allow an assessment of the magnitude of that impact upon the setting and any resulting benefit, loss or harm to significance. Within the assessment cumulative impact should also be considered.

Historic Environment Good Practice Advice in Planning Note 3, on the Setting of Heritage Assets, is an update on the 2011 EH settings guidance and should be used to inform your assessment. In line with GPA3, we would advise that whilst systematic scoring systems and matrices may assist in analysis, setting is a matter of qualitative and expert judgement and they cannot provide a systematic answer. Technical analyses of this type should be seen primarily as material supporting a clearly expressed and non-technical narrative argument.

Finally, we should like to stress that this response is based on the information provided in this consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, to object to specific proposals, which may subsequently arise, where we consider that these would have an adverse effect upon the historic environment. If you have any queries about any of the above, or would like to discuss anything further, please contact me.

Yours sincerely,

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