

WRITTEN REPRESENTATION

East Pye Solar — Planning Inspectorate Reference EN0110014

To: The Examining Authority, The Planning Inspectorate

Project Reference: EN0110014 (East Pye Solar Project)

Submitted by: Mrs Julie Graham — Interested Party

Property: [REDACTED]

Date: 14 September 2026

Subject: Formal Written Representation — Objection to East Pye Solar Project (EN0110014): Severe Harm to the Historic Setting, Immediate Approach, and Heritage Cluster at Hawes Green / Site 8

Dear Examining Authority,

I have now had a chance now to thoroughly read and digest the application and numerous supporting documents. Having done so, I am writing to register my formal objection to the proposed East Pye Solar Project, specifically concerning the placement of Site 8 (Sub-Sites 8A and 8B) and its severe, unmitigated impact on Hawes Green and the Shotesham Conservation Area.

I reside at [REDACTED] — a barn conversion that forms part of a highly protected, tight-knit historic cluster on Hawes Green. The cluster comprises:

- [REDACTED] (the Property)
- [REDACTED] (immediately adjacent)
- [REDACTED] (immediately adjacent)
- Watendlath the 3rd Barn of the cluster of Barns
- St Mary's Church, Shotesham St Mary — Grade II* listed, Historic England List Entry 1050642 (prominent hilltop medieval church approximately 100 metres from the Property)
- Remains of the Church of St Martin, Shotesham — Grade II listed, Historic England List Entry 1152468 (medieval standing ruin approximately 100 metres from St Mary's)

This is an exceptional and irreplaceable heritage cluster: three Grade II listed residential buildings in immediate proximity to a Grade II* listed church and a Grade II listed medieval ruin, all within the Shotesham Conservation Area. Grade II* status

[REDACTED]

is held by only approximately 6% of all listed buildings in England, denoting a building of more than special interest.

Sub-Site 8B, the nearest element of Site 8, is situated approximately 1.2 miles (approximately 1.9km) to the east of the Property. Whilst we hopefully believe Watyendlath does not look directly over the Shotesham Beck Valley from its windows, we are not entirely sure about this as the plans are inadequate as stated. Nonetheless, the industrial footprint of Site 8 will be acutely visible from Hawes Green within just minutes of walking from our doorsteps, and will permanently and fundamentally alter the immediate landscape context, historic approach, and rural setting of this entire heritage cluster.

I base my objections on the following critical planning, heritage and methodological grounds, each supported by reference to ES Chapter 7 — Landscape and Visual (APP/6.1.7, Revision 1, March 2026).

Ground 1: Destruction of the Immediate Approach and Historic Setting (Historic England GPA3 and Section 66)

Under Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and Historic England's Guidance on Setting of Heritage Assets (GPA3), the 'setting' of a heritage asset includes the surroundings within which it is experienced and approached, not merely what is visible from its windows. Hawes Green serves as the immediate rural framework and historic approach for the entire heritage cluster described above.

Introducing 4.5 metre high industrial solar tracker arrays approximately 1.2 miles to the east breaks the historic group value and rural tranquillity that connects these designated assets, and permanently destroys the landscape context that residents and visitors experience daily when approaching and moving within the Conservation Area. This harm falls directly on the setting of St Mary's Church (Grade II*), St Martin's (Grade II), and the three listed residential buildings, all of which share a historic rural setting characterised by open agricultural countryside across the Shotesham Beck Valley.

The Court of Appeal confirmed in *Barnwell Manor Wind Energy Ltd v East Northamptonshire DC [2014]* that the Section 66 duty requires decision-makers to give 'considerable importance and weight' to harm to listed buildings and their settings. This duty applies with even greater force to the Grade II* listed St Mary's Church. An Examining Authority that concludes harm to the setting of these assets is outweighed by energy policy benefits without giving it considerable importance and weight would be acting unlawfully.

I note that ES Chapter 7 contains no viewpoint assessment from or toward St Mary's Church or St Martin's Church, and that the impact of Site 8 on the settings of these assets does not appear to have been assessed within the LVIA. I request that the Examining Authority satisfies itself that ES Chapter 10 (Cultural Heritage) addresses the Section 66 duty with the weight required by the Barnwell Manor judgment, and that this question is examined at any Issue-Specific Hearing on heritage.

Ground 2: Methodological Failure — No Residential Visual Amenity Assessment Conducted from Hawes Green

I strongly object to the assessment framework applied in Table 7.4 of ES Chapter 7. The developer has failed to conduct a dedicated Residential Visual Amenity Assessment (RVAA) from Hawes Green, in breach of the Landscape Institute's Technical Guidance Note 02/19 (TGN 02/19).

By treating Hawes Green solely as a transient, recreational footpath receptor, the developer has completely downplayed the true impact. For the permanent residents of [REDACTED], this is not a passing view from a public path — it is our immediate living environment, our historic approach, and the daily experience of our listed homes. The following specific failures in the LVIA are confirmed by ES Chapter 7 itself:

- Table 7.4 of ES Chapter 7 lists 21 assessed viewpoints for Sites 7 and 8 combined. Hawes Green does not appear as a named receptor or viewpoint in any of them.
- The only assessed viewpoint in the vicinity of the Property is Site 7 VL11 — PRoW Shotesham FP21 — a public footpath, rated medium sensitivity. This is not a residential receptor assessment and does not represent the impact on the domestic curtilage and primary living outlook of the Property.
- ES Chapter 7 paragraph 7.5.22 explicitly states that potential visual effects are likely to be experienced from 'settlement edges of... Shotesham' and from 'PRoW... around Shotesham'. Having acknowledged Shotesham as a settlement from which visual effects are likely, the Applicant has then failed to assess any residential receptor viewpoint within Shotesham St Mary or Hawes Green. This is a direct internal inconsistency.
- ES Chapter 7 paragraph 7.7.14 confirms that solar PV panel development within Sub-Sites 8A and 8B has been excluded in proximity to residential properties 'and from Shotesham'. This acknowledgement that Shotesham is a sensitive residential receptor makes the absence of a viewpoint assessment from within the settlement even more inexplicable.
- Table 7.3 of ES Chapter 7 confirms that Site 8 is rated High value, High susceptibility and High sensitivity — the only solar site in the entire 1,100 hectare scheme to receive this rating. Despite this, no RVAA has been conducted from Hawes Green, the closest residential and heritage receptor cluster to the north-east of Site 8.

By avoiding a dedicated RVAA, the developer has bypassed the requirement under TGN 02/19 to evaluate the permanent impact on the domestic curtilage and primary living outlook of the listed properties at Hawes Green. Due to the elevated cross-valley topography described in Ground 3 below, the 4.5 metre tracker panels will be inescapably dominant from Hawes Green, breaching the Residential Visual Amenity Threshold as defined in TGN 02/19 paragraph 2.1 — the point at which a scheme's nature and magnitude potentially affects living conditions and residential amenity.

Ground 3: Topographical Vulnerability, Cross-Valley Views, and the Fallacy of Hedge Screening

Hawes Green occupies an elevated ridge position looking directly across the Shotesham Beck Valley. Site 8 is located on the opposing sloping margins of the valley approximately 1.2 miles to the east, meaning there is a direct, elevated line of sight over open landscape toward the solar arrays from Hawes Green and from the public routes immediately surrounding our properties.

The Design Approach Document and Outline LEMP propose that ground-level hedgerow planting alongside Public Rights of Way — principally Shotesham FP19 and FP22 — will mitigate views of Site 8 by Year 15. ES Chapter 7 paragraph 7.7.20 confirms a target establishment height of 3 metres for these screening hedgerows. This mitigation proposal is a topographical fallacy and is physically incapable of providing any screening benefit from the elevated position of Hawes Green, for the following reasons:

- The hedgerows proposed for screening are at valley-bottom level, adjacent to footpaths within the Order Limits. Hawes Green is elevated on the ridge above the valley.
- A 3 metre hedgerow at valley-bottom level cannot physically obscure 4.5 metre solar tracker panels at maximum inclination when viewed from a higher elevation further up the valley slope. Basic geometry demonstrates that the line of sight from Hawes Green passes over any valley-bottom planting.
- Solar tracker panels rotate to face east in morning hours — directly toward Hawes Green — presenting their maximum surface area and height of 4.5 metres (at 60 degrees inclination as confirmed in ES Chapter 7 paragraph 7.4) at the times of day when residents are most likely to be using their domestic curtilage and approaching their properties.
- The Applicant's own assessment in Table 7.5 of ES Chapter 7 rates Site 8 as having a Major Significant adverse effect on landscape character during construction — the highest construction-phase landscape impact rating of any solar site in the scheme.

The visual intrusion from Site 8 onto the historic walking routes, immediate approach, and outdoor amenity of Hawes Green will therefore remain permanent and completely unmitigated throughout the 40-year operational life of the scheme, notwithstanding the Applicant's reliance on Year 15 hedge screening that cannot work from this vantage point. The visual blight on our historic environment will be both immediate and enduring.

Requests to the Examining Authority

For the reasons set out above, I urge the Examining Authority to:

- (a) Require the Applicant to confirm whether Hawes Green falls within the ZTV for Site 8 (Figure 7.5.4) and, if so, to explain why no Residential Visual

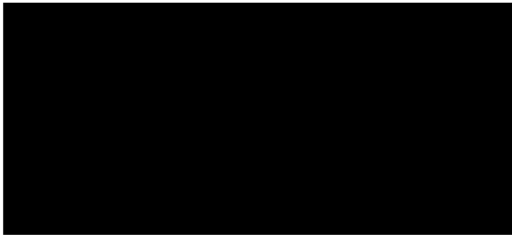
Amenity Assessment has been conducted from this location, given that ES Chapter 7 paragraph 7.5.22 acknowledges Shotesham as a settlement from which visual effects are likely;

- (b) Require the Applicant to produce a dedicated RVAA from a representative viewpoint at Hawes Green, assessing the impact of Sub-Sites 8A and 8B in tracker panel configuration at maximum inclination (4.5 metres, 60 degrees, morning-east orientation), viewed from the elevated ridge position;
- (c) Require the Applicant to demonstrate that the proposed Year 15 hedge screening is geometrically capable of providing any visual benefit from an elevated ridge position at Hawes Green, given that valley-bottom planting at 3 metres cannot screen panels of 4.5 metres viewed from above;
- (d) Satisfy itself that ES Chapter 10 (Cultural Heritage) has adequately assessed the impact of Site 8 on the settings of St Mary's Church (Grade II*, List Entry 1050642) and the Remains of St Martin's Church (Grade II, List Entry 1152468), and that the Section 66 duty has been discharged with the considerable importance and weight required by *Barnwell Manor Wind Energy Ltd v East Northamptonshire DC* [2014];
- (e) Satisfy itself that the group value and historic setting of the five designated heritage assets at Hawes Green — three Grade II listed residential buildings, a Grade II* church, and a Grade II medieval ruin, all within the Shotesham Conservation Area — has been properly assessed as a heritage cluster and that the cumulative harm to this cluster has been given appropriate weight;
- (f) Reject the inclusion of Site 8 within the East Pye Solar masterplan unless and until the Applicant can demonstrate that the severe, unmitigated visual harm to the Property, to the Shotesham Conservation Area, and to the settings of the designated heritage assets at Hawes Green can be adequately addressed; and
- (g) Include this Written Representation in the evidence considered at any Issue-Specific Hearing relating to landscape and visual impact and cultural heritage.

The developer has failed to respect the settings of multiple high-tier heritage assets at Hawes Green and has offered no viable mitigation for the visual harm inflicted upon the immediate surroundings of this exceptional heritage cluster. Site 8 is rated as the highest sensitivity landscape site in the entire scheme by the Applicant's own assessment. It should not be consented without a proper assessment of its impact on the most sensitive residential and heritage receptors in its immediate vicinity.

In reality, this first and foremost a commercial development that will industrialise the landscape with a rapidly aging technology and cause enormous damage to local wildlife and biodiversity.

Yours faithfully,



 **Julie Graham** 



