



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

**APPLICATION BY EAST PYE SOLAR LIMITED FOR AN ORDER GRANTING
DEVELOPMENT CONSENT FOR EAST PYE SOLAR**

APPLICATION REF: EN0110014

SUBMISSION DEADLINE: 6 OCTOBER 2026

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

REGISTRATION ID: [REDACTED]

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Summary

Historic England considers that the Environmental Statement provides a broadly adequate basis for the Examination of the Scheme's effects upon the historic environment. We welcome the extent to which heritage considerations have informed the Scheme design, including development exclusions and setbacks which reduce effects upon the settings of designated heritage assets.

Historic England nevertheless considers that there are matters that require clarification or resolution during the Examination. These principally concern the assessment of effects upon heritage significance through changes within setting; the distinction between visual screening and mitigation of harm to heritage significance; the reasonable worst case and cumulative assessment; and the securing of heritage mitigation and design commitments relied upon in the Environmental Statement.

In particular, the Applicant should be asked to demonstrate how the heritage-led development exclusions and setbacks relied upon in the Cultural Heritage assessment are secured through the DCO. We also consider there is an apparent inconsistency between Requirement 5 and the Design Principles, Parameters and Commitments which should also be resolved, particularly in relation to the controls applying to the National Grid Substation and overhead grid connection infrastructure.

Historic England welcomes the archaeological mitigation framework provided through Requirement 12 and the Archaeological Mitigation Strategy. Subject to the resolution of the detailed matters identified in this Written Representation, we consider that this provides an appropriate basis for further archaeological investigation and mitigation. Provision for Historic England's involvement where remains of potential national significance or matters within our statutory remit are identified and included in the Environmental Statement.

Historic England will continue to engage with the Applicant and relevant local authorities with the aim of resolving the outstanding matters identified in this Written Representation.

1. Introduction

- 1.1 The Historic Buildings and Monuments Commission for England, known as Historic England, is the Government's statutory adviser on the historic environment in England. Historic England is an executive non-departmental public body sponsored by the Department for Culture, Media and Sport.
- 1.2 The Scheme comprises the construction, operation, maintenance and decommissioning of a solar photovoltaic electricity generating station and associated development, including Battery Energy Storage System infrastructure, Project Substations, Grid Connection Infrastructure and a new National Grid Substation.
- 1.3 The Scheme has the potential to affect the significance of designated heritage assets, including through changes within their settings. Historic England's principal interests are identified in Section 2 of this Written Representation.
- 1.4 Historic England provided advice on the Preliminary Environmental Information Report in a letter dated 6 August 2025 and subsequently submitted a Relevant Representation following acceptance of the application. We have continued to engage with the Applicant's heritage consultants during the pre-examination and examination process and are working with the Applicant to prepare a Statement of Common Ground.
- 1.5 The application is accompanied by an Environmental Statement prepared under the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. Historic England considers that the Environmental Statement is broadly adequate for the purposes of the Examination, subject to the matters identified in this Written Representation.
- 1.6 This Written Representation expands upon the matters raised in our Relevant Representation and sets out Historic England's comments on the designated heritage assets affected by the Scheme, the Environmental Statement, the draft Development Consent Order and associated control documents, and the relevant policy framework.
- 1.7 Our Relevant Representation identified potential cumulative effects with Tasway Energy Park as requiring further consideration. The East Pye application documentation now records Tasway Energy Park as being on indefinite hold. In light of that change in circumstances, Historic England does not presently seek further assessment of cumulative effects between East Pye Solar and Tasway Energy Park.

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

General Comments

- 2.1 The information relevant to historic environment assessment is found primarily in the following documents:
- *Environmental Statement – Vol 1 Chapter 7 Landscape and Visual;*
 - *Environmental Statement – Vol 1 Chapter 9 Water Environment;*
 - *Environmental Statement – Vol 1 Chapter 10 Cultural Heritage;*
 - *Environmental Statement – Vol 1 Chapter 16 Ground Conditions;*
 - *Environmental Statement – Vol 3 Appendices 7.1-7.3 Landscape and Visual supporting information;*
 - *Environmental Statement – Vol 3 Appendix 10.1 Heritage Statement.*
- 2.2 Historic England's primary interest in relation to the Scheme is its effect upon the significance of highly designated heritage assets, comprising Scheduled Monuments, Grade I and Grade II* listed buildings and Conservation Areas. Our consideration includes effects arising through changes within the settings of those assets.
- 2.3 Historic England has not generally provided detailed advice on Grade II listed buildings, non-designated buildings or non-designated archaeology. We defer to the relevant local authority conservation, landscape and archaeological advisers on these matters, except where they are relevant to the significance or setting of assets within Historic England's remit. We have provided some commentary on methodology relating to the non-designated heritage assets where it is within our remit for specialist advice and in relation to mitigation and the DCO.
- 2.4 The comments below focus upon those designated heritage assets and issues where Historic England considers that its advice will assist the Examination. They should be read alongside our detailed comments on the Environmental Statement in Section 3 of this Written Representation.

Methodology / Assessment

- 2.5 Historic England notes that the Cultural Heritage assessment uses a matrix-based EIA methodology, informed by professional judgement, to determine receptor sensitivity, magnitude of impact and significance of effect. We consider this an appropriate approach in principle, provided that professional judgement is used alongside the matrix.
- 2.6 EIA significance and harm to the significance of a designated heritage asset are not interchangeable. An effect which is not significant in EIA terms may

nevertheless result in harm to heritage significance. Similarly, effects arising through setting should be assessed by reference to the contribution that setting makes to significance and the effect of the Scheme upon that contribution; visibility is relevant evidence but is not, in itself, determinative.

- 2.7 Historic England's detailed comments on the application of the methodology, including the sensitivity assigned to Conservation Areas, the use of landscape and visual evidence, landscape mitigation and the assessment of cumulative effects, are set out in Section 3 of this Written Representation.
- 2.8 The comments below focus upon those highly designated heritage assets where Historic England considers that the Scheme has the greatest potential to affect significance, or where further clarification of the Applicant's assessment is required.

Church of St Michael, Stratton St Michael – Grade I (NHLE 1304267)

- 2.9 The Church of St Michael is a highly significant medieval parish church whose significance derives principally from its architectural, archaeological and historic interest. Its rural setting also contributes to its significance and to the ability to appreciate the church as a historic focal point within the surrounding agricultural landscape.
- 2.10 Historic England welcomes the changes made to the Scheme in response to the church. In particular, the exclusion of the southern fields of Sub-Site 4B from built development and the resulting substantial setback of the panels to retain open land within an important part of its rural setting. The Applicant's Heritage Statement itself recognises that these fields contribute to the ability to appreciate the significance of the church.
- 2.11 We consider this to be a positive example of mitigation, which has been informed by the assessment of the impact of the proposal on the significance of the heritage assets. The exclusion and setback are important to the support the heritage mitigation and should therefore be appropriately secured through the DCO. Our separate concern regarding the assessment of cumulative effects upon the church is set out in Section 3.

Church of St Catherine, Fritton – Grade I (NHLE 1373281) and Fritton Conservation Area

- 2.12 The Grade I Church of St Catherine is an important historic focal point within Fritton, and its relationship with the historic settlement and surrounding rural landscape contributes to its significance. These qualities also contribute to the character and significance of Fritton Conservation Area.
- 2.13 Historic England welcomes the substantial setback of the proposed development from the church and Conservation Area. The Heritage Statement concludes that this would retain the prominence of the church and its rural

setting, particularly on the approach along The Street. We support this heritage-led design response and again consider it would be important that the development exclusion and setback upon which the conclusion depends should be appropriately secured through the DCO.

Old Rectory, Church Lane, Stratton St Michael – Grade II* (NHLE 1373264)

- 2.14 The significance of the Old Rectory derives from its architectural and historic interest, together with its relationship with the surrounding rural landscape and the Grade I Church of St Michael.
- 2.15 The Heritage Statement concludes that the Scheme would cause no harm to the significance of this asset, relying in part upon the separation from the nearest solar arrays and absence of intervisibility. Historic England considers that the conclusion should also be demonstrably based upon the contribution made by the wider rural and historic relationship between the Rectory and church to the significance of the asset, rather than absence of visibility alone. We recommend the applicant is asked to revisit this assessment in light of these comments and in relation to the guidance set out in GPA3.

Oaks Farmhouse, Shotesham Road – Grade II* (NHLE 1170906)

- 2.16 Oaks Farmhouse has a historic relationship with the surrounding agricultural landscape. The Applicant's assessment acknowledges that Sub-Site 7L forms part of its wider historic agricultural setting, including a former tenurial relationship, and makes some contribution to its significance.
- 2.17 The Heritage Statement nevertheless concludes that the Scheme would cause no harm, with proposed woodland planting expected to screen the solar arrays over time. Historic England considers that the assessment should more clearly explain why the acknowledged change to land which contributes to significance results in no harm. The effect of the proposed woodland upon the agricultural character of the setting should also form part of that consideration. We recommend the applicant is asked to revisit this assessment in light of our findings.

Church of St Mary, Shotesham – Grade II* (NHLE 1050642) and Shotesham Conservation Area

- 2.18 The Grade II* Church of St Mary forms part of the historic settlement of Shotesham within a strongly rural valley landscape. The character and significance of the Conservation Area similarly derive in part from the relationship between the historic settlement and its surrounding countryside.
- 2.19 Historic England notes that the Heritage Statement scopes both the Grade II* church and Shotesham Conservation Area out of detailed assessment. This is of concern given the separate landscape evidence, which identifies Site 8 as

a highly tranquil rural landscape of high sensitivity and identifies appreciable change within the landscape around Shotesham.

- 2.20 We therefore consider that further explanation is required to demonstrate that the contribution made by the wider rural and valley landscape to the significance of these assets has been adequately considered, including relevant historic and spatial relationships. The conclusion should not rely principally upon the absence of direct intervisibility. We recommend the applicant is asked to review the position set out in the Environmental Statement.

Camp in village, Tasburgh – Scheduled Monument (NHLE 1003984)

- 2.21 The Scheduled Monument 'Camp in village' at Tasburgh is an earthwork enclosure of uncertain date; possibly representing an Iron Age hillfort or early medieval fortified enclosure. It derives significance both from the extensive archaeological remains known to be preserved within the boundaries of the monument, and from its setting at the core of the original early medieval settlement at Tasburgh, and at a high point within the wider landscape.
- 2.22 The Heritage Statement, while acknowledging the contribution to significance made by the monument's siting at a high point within the landscape, argues that the part of the landscape in which the proposed scheme is sited does not contribute to the significance of the monument due to the lack of intervisibility between the monument and the area of the proposed scheme. It further argues that, due to the presence of extensive mature screening on and around the monument, the monument now principally derives significance from its archaeological interest rather than its landscape setting.
- 2.23 Historic England would dispute the conclusion that the scheduled monument at Tasburgh derives significance primarily from its archaeological importance rather than its landscape setting. We further consider that direct intervisibility between above-ground features of the monument and the wider landscape is not necessarily the most appropriate metric by which to judge whether changes to the landscape setting of the monument will affect its significance. We therefore recommend the applicant is asked to reconsider this matter in light of these comments.

Castle Hill, Hangman's Hill and adjoining earthworks, Darrow Green (NHLE 1002885)

- 2.24 The above monument has been scoped out of further assessment, despite being located within the 5km study area. We cannot find a justification for excluding this highly designated heritage asset from consideration, other than its lack of direct intervisibility from the scheme. We recommend the applicant is asked to provide additional details to support their position.

Newton Flotman Bridge (NHLE 1002885)

- 2.24 The above is referenced in Table 1 of the Heritage Statement as a Scheduled Monument which has been scoped out of further assessment. We note that the bridge was removed from the Schedule in December 2025, though it remains a Grade II listed building (NHLE 10507706).

3. Environmental Statement Comments by Chapter

Volume 1

Chapter 4: The Scheme

- 3.1 **Sections 4.2.18–4.2.24 – Rochdale Envelope and Scheme Parameters.** The design of the Scheme retains a degree of flexibility through the Rochdale Envelope, including in relation to the arrangement and specification of the Solar PV Panels, Conversion Units, BESS, Project Substations, National Grid Substation and Grid Connection Infrastructure. The Applicant states that each technical chapter has assessed the design identified to be the likely worst-case scenario for that discipline and that the detailed design will be required to accord with the Design Principles, Parameters and Commitments.
- 3.2 Historic England notes this approach. In relation to the historic environment, it will be important that the parameters assessed represent an appropriate realistic worst case for effects upon heritage significance, including effects arising through changes within the setting of designated heritage assets. The heritage worst case will not necessarily be the same as the worst case identified for landscape and visual effects. We will consider this further in our comments on the Cultural Heritage assessment and the relevant supporting documents.
- 3.3 **Table 4.1 – Scheme Parameters.** This table summarises the elements included in the proposed Scheme. Several of these elements would have a below-ground impact. These elements could therefore affect buried archaeological remains.
- 3.4 It goes on to state that the PV mounting structures would ordinarily use piled foundations up to 4m below ground level, with concrete feet or other non-ground-penetrative techniques used where archaeological protection is required (paragraph 4.3.16). Historic England welcomes the incorporation of archaeological avoidance into the Scheme design.
- 3.5 Table 4.1 also establishes substantial maximum parameters for some elements of the above-ground electrical infrastructure. These include Project Substations, the National Grid Substation and new/repositioned electricity pylons. The National Grid Substation could occupy a compound of up to 6ha

and pylons could extend to 61m above ground level. These elements have the potential to affect the setting and significance of designated heritage assets differently from the solar arrays themselves. The Cultural Heritage assessment should therefore appropriately consider the effects of these individual components, as well as their combined presence with the solar arrays and other associated infrastructure.

3.6 The parameters also include perimeter fencing, CCTV and, around the infrastructure compounds, 3m high palisade fencing. Where relevant to the setting of designated heritage assets, the Cultural Heritage assessment should take account of these ancillary elements and the degree to which, collectively, they may alter the character and experience of the existing rural landscape.

3.7 Several of the elements of the proposed Scheme could have quite deep impacts. For example, some of the structures may require piled foundations up to a maximum depth of 12m. This includes the Substations, the National Grid Substation, Grid Connection Infrastructure and the BESS (Table 4.1). If piling options are going to be used, the impacts that this may have on buried archaeological and palaeoenvironmental remains needs to be considered.

3.8 The below-ground impacts of some of the elements have not been defined. This includes the Conversion Units, Substations, Pylons and elements of the fencing/lighting. Information is needed so that it is clear if/how buried archaeological remains may be impacted by the proposed development.

3.9 **Sections 4.3.8–4.3.17 – Solar PV Panels and Mounting Structures.** The Scheme allows for either Single-Axis Tracker Panels and/or Fixed Panels. The Tracker Panels could reach a maximum height of 4.5m and would move from east to west during the day, returning to a resting position at 60 degrees overnight; the Fixed Panels could reach a maximum height of 3.5m.

3.10 In considering effects upon the setting of designated heritage assets, it will be important that the Cultural Heritage assessment has appropriately considered the panel option which represents the realistic, worst case for the specific heritage receptor. In the case of Tracker Panels, this should take account where relevant not only of their maximum height but also of their changing orientation and appearance over the course of the day.

3.11 **Section 4.3 Conversion Units and other electrical infrastructure.** Historic England welcomes the intention for finishes to Conversion Units to use subdued, non-reflective tones selected to sit as discreetly as practicable within the surrounding environment. Where the Cultural Heritage assessment relies upon the colour, materials or finish of infrastructure to avoid or reduce

harm to the significance of designated heritage assets, appropriate commitments should be secured through the detailed design process.

- 3.12 **Cabling and trenchless crossings.** We are pleased to see that the potential impacts of cabling in areas of archaeological sensitivity have been considered, to avoid or minimise disturbance below ground level (Section 4.3.24).

3.13 It is noted that trenchless cable route crossings may be required at key locations, including the use of Horizontal Directional Drilling (HDD). The use of HDD will require the excavation of a launch pit and a reception pit (Section 4.3.16), with an area of up to 25m by 25m required at each pit. The potential impact on heritage will need to be considered not only for the HDD cable route, but also for the launch and reception pits.

- 3.14 **Section 4.4.61 – Landscape and Ecological Mitigation.** We note that an Outline Landscape and Ecology Management Plan accompanies the DCO Application and that a detailed LEMP would be produced prior to the start of construction. Landscape planting may have an important role in reducing effects upon the setting of designated heritage assets.

- 3.15 Where such planting is relied upon as heritage mitigation, however, consideration should be given to the contribution made by setting to the significance of the affected asset rather than visibility alone. Screening will not necessarily mitigate effects arising from changes to historic landscape character, openness, designed or historic views, or spatial and functional relationships between heritage assets and their surroundings. The character and location of new planting should itself be sympathetic to the historic environment.

- 3.16 **Sections 4.5.10–4.5.12 – Operational Lighting.** We welcome the intention that lighting would not generally be required within the Sites during the operational phase, with routine maintenance undertaken during daylight hours as far as practicable. Motion-sensing security lighting would, however, be provided at the Project Substations, National Grid Substation and BESS Compound.

- 3.17 Where the character of darkness and the absence of artificial lighting contribute to the setting and significance of designated heritage assets, the potential effect of operational lighting should be appropriately considered. We welcome the commitment to minimise light spill and would expect this to be secured through the detailed design and OEMP.

- 3.18 **Section 4.6 – Decommissioning.** It is noted that the Scheme will be in operation for 60 years (Section 4.6.1) and that cables, foundations and below-ground infrastructure may be left in situ during the decommissioning phase

(Sections 4.6.3 and 4.6.6). It should be stated in the Cultural Heritage chapter if this may impact the future application of geophysical surveys in the area.

- 3.19 We also note that, while much of the solar generating infrastructure would be removed following the 60-year operational period, the National Grid Substation and Grid Connection Infrastructure would remain in situ. Mitigation planting specifically required to support the location of the National Grid Substation would also be handed over to National Grid for its continued maintenance and management. The Cultural Heritage assessment should therefore distinguish between those effects which would genuinely be temporary and reversible following decommissioning and those arising from infrastructure and associated landscape changes which would remain. Any reliance upon the temporary nature or reversibility of the Scheme when assessing harm to the significance of designated heritage assets should reflect this distinction.

Chapter 7: Landscape and Visual

- 3.20 **Role of the LVIA in the heritage assessment.** Historic England notes that Chapter 7 assesses landscape and visual effects, while Conservation Areas and other designated heritage assets are assessed as receptors in Chapter 10. We consider this distinction reasonable in principle and recognise that the LVIA provides useful evidence for understanding changes within the settings of designated heritage assets, including through its study areas, ZTV, viewpoints and assessment of changes to landscape character and perceptual qualities.
- 3.21 However, LVIA conclusions do not determine effects upon heritage significance. A landscape or visual effect which is not significant in LVIA terms may nevertheless affect the significance of a heritage asset, and setting is not limited to visibility. Relevant considerations may include historic landscape character, openness, land use, spatial relationships between historic places and the experience of moving through the landscape. The adequacy of the study area and visual evidence for heritage purposes, and the significance of any resulting changes, should therefore be established through the Cultural Heritage assessment in Chapter 10.
- 3.22 **Section 7.7 – Embedded mitigation.** Historic England welcomes Design Principle 2.7 at paragraph 7.7.12, which requires the Scheme to: *‘Consider the setting of heritage assets and mitigate any impact by design, where practicable’*.
- 3.23 We also note the wider principles requiring the Scheme to respond to landscape character, retain and enhance existing vegetation, create woodland belts and native tree planting, restore hedgerows and carefully site infrastructure and landscape buffers.

- 3.24 These measures have the potential to reduce effects upon the settings of designated heritage assets. However, screening should not in itself be equated with mitigation of effects upon heritage significance. Where openness, agricultural character, historic land-use patterns, designed or incidental views, or relationships between historic places contribute to significance, new woodland, hedgerow or other planting could itself alter that contribution even where it reduces visibility of Scheme infrastructure.
- 3.25 We will therefore consider in reviewing Chapter 10 whether landscape mitigation relied upon to reduce effects upon designated heritage assets has been designed in response to the contribution made by their settings to their significance, rather than principally to screen the Scheme from view. Any measures relied upon in reaching the heritage conclusions should also be adequately secured through the Design Principles, Parameters and Commitments and/or other relevant DCO controls.
- 3.26 **Section 7.8 – Assessment of likely effects.** Historic England notes that the assessment identifies significant adverse landscape and visual effects across a number of parts of the Scheme, including an increased urbanising influence from infrastructure with industrial characteristics within a rural and relatively open landscape. These findings provide relevant evidence for Chapter 10 where rural or agricultural character contributes to the significance of designated heritage assets through their setting. Effects upon heritage significance should not be discounted solely because intervening vegetation limits direct visibility of Scheme infrastructure.
- 3.27 **Site 8 – Shotesham** Historic England notes that the Applicant's own LVIA identifies appreciable landscape and visual change associated with Site 8. Chapter 7 concludes that Site 8 would experience significant adverse landscape effects during operation, which remain Moderate and Significant at Year 15 despite maturation of landscape mitigation. The overall conclusions similarly identify Site 8 as one of the locations at which significant adverse residual landscape and visual effects are concentrated.
- 3.28 The visual assessment also identifies significant effects at viewpoints in and around Shotesham. Site 8-VL2, at the origin of Shotesham FP18 on Wash Lane, is of particular relevance. The associated visualisation is a winter view at 32.6m AOD across the rural landscape towards Sites 8A and 8B. The detailed visual assessment describes a direct view towards solar arrays within Site 8B occupying elevated land across the valley, with planting subsequently relied upon to screen those arrays.
- 3.29 Historic England notes, however, that no viewpoint appears to have been specifically selected to illustrate the setting of the Grade II* Church of St Mary, Shotesham, including relevant views to or from the church and its relationship with the surrounding historic settlement and landscape. The absence of a

dedicated viewpoint does not necessarily constitute an assessment deficiency in itself: the question is whether the available visual evidence is sufficient to understand the contribution made by setting to the significance of the church and the change to that contribution arising from Site 8.

- 3.30 The same issue arises in relation to the Shotesham Conservation Area. Given the Applicant's own identification of significant landscape and visual change within the surrounding Shotesham landscape, Chapter 10 should demonstrate that it has considered whether the rural valley, surrounding agricultural landscape and relevant spatial and visual relationships contribute to the significance of the Conservation Area, rather than limiting the assessment to visibility of Scheme infrastructure from within its boundary.
- 3.31 This is particularly important because the LVIA relies upon woodland and hedgerow planting to reduce some visual effects over time. Where such planting is relied upon in Chapter 10 as heritage mitigation, consideration should also be given to whether the resulting alteration to landscape character, openness or historic relationships would itself affect those aspects of setting which contribute to heritage significance. Reduced visibility of solar development should not automatically be taken to represent an equivalent reduction in effects upon heritage significance.
- 3.32 **Section 7.11 – Cumulative effects.** Historic England notes the conclusion that no significant cumulative landscape or visual effects would arise. However, this does not necessarily establish the absence of cumulative effects upon heritage significance. Chapter 10 should therefore demonstrate that relevant developments have been considered where they have the potential to affect the same designated heritage asset or the same aspects of its setting.3.15
- 3.33 **Section 7.12 – Conclusion.** Historic England notes that Chapter 7 identifies long-term change to the rural landscape and significant adverse effects remaining at a number of locations after mitigation, including at Site 8 at Year 15. It also confirms that the National Grid Substation and established mitigation planting would remain following decommissioning. These findings should be appropriately reflected in Chapter 10, including in relation to the duration and reversibility of effects upon the settings of designated heritage assets.

Chapter 9: Water Environment

- 3.34 **Section 9.5.6** outlines the potential impacts that the proposed scheme may have on the water environment. Several of the issues cited could also impact the historic environment. For example, changes to the water environment could lead to waterlogged archaeological remains and deposits drying and/or

becoming exposed to oxygen. This could lead to the degradation and/or loss of vulnerable organic archaeological and palaeoenvironmental remains.

- 3.35 In addition, the potential for new contaminants in surface water runoff during construction and decommissioning could impact the historic environment. Contaminants can impact buried archaeological remains by making sites inaccessible for further work due to health and safety issues. The presence of contaminants can also limit the scientific assessments that could be applied to archaeological remains in the future, such as radiocarbon dating. Historic England recommends that the potential impacts of contamination on heritage are considered, and that the Historic England document 'Land Contamination and Archaeology' (2017) is referred to: <https://historicengland.org.uk/images-books/publications/land-contamination-and-archaeology/>.

Chapter 10: Cultural Heritage

- 3.36 **Scope, baseline and assessment methodology.** Historic England notes that the assessment considers direct effects upon archaeological remains and indirect effects upon the significance of heritage assets through changes within their settings. We welcome the use of a 5km study area for Scheduled Monuments and Grade I and II* listed buildings, together with the flexible approach described at paragraphs 10.5.3–10.5.5 whereby heritage assets beyond the defined study areas may be considered where physical, historical or wider landscape relationships indicate this is necessary.
- 3.37 We also welcome the recognition that the assessment of setting should concern the effect upon the significance of the heritage asset as a whole, rather than simply the effect upon a particular view. However, this distinction should be applied consistently when determining effects. In particular, the absence of a significant effect in EIA terms does not necessarily demonstrate the absence of harm to the significance of a designated heritage asset. The assessment itself illustrates this distinction in identifying a minor adverse effect upon Barn Cottages as less than substantial harm, notwithstanding that this is not significant in EIA terms.
- 3.38 In relation to below-ground heritage, paragraph 10.5.7 identifies potential effects including direct construction impacts, vibration and changes to setting. However, it does not identify potential effects arising from changes to the water environment. This is relevant where HDD and other works may affect deposits with archaeological and palaeoenvironmental potential, including peat and other waterlogged deposits. Similarly, the baseline in section 10.6 should more clearly recognise the palaeoenvironmental potential of the Scheme area, alongside the known archaeological sites and finds.
- 3.39 Historic England therefore recommends that the Applicant clarifies the distinction between EIA significance and heritage harm throughout Chapter 10,

and supplements the archaeological baseline and impact pathways to address archaeological and palaeoenvironmental remains potentially affected through changes to the water environment.

- 3.40 **Embedded mitigation, heritage-led design and its securing.** Historic England welcomes the evidence in section 10.7 that heritage considerations have influenced the spatial design of the Scheme through development exclusions and increased setbacks. These include substantial setbacks in relation to the Grade I Church of St Michael and Fritton Conservation Area; removal of Site 6 from the built parameters; setbacks and exclusions associated with Saxlingham Green Conservation Area; and the reduction of development at Sites 8 and 9.
- 3.41 We are also pleased to see that the potential effects of different root structures and planting types upon archaeology have been considered as part of the landscape mitigation at paragraph 10.7.8. Historic England notes, however, that paragraph 10.7.3 identifies construction effects including noise, vibration and visibility, but does not appear to address changes to the water environment. This should be considered where HDD or other works have the potential to affect waterlogged archaeological or palaeoenvironmental deposits.
- 3.42 Where the assessment relies upon these exclusions, setbacks or landscape measures, they should be demonstrably secured through the DCO and associated control documents.
- 3.43 **Landscape screening, setting and the assessment of operational effects.** Historic England notes the substantial reliance placed upon landscape planting and visual screening in sections 10.7–10.10. The assessment recognises that operational setting effects can arise from changes to landscape character, visual intrusion, glare and noise, and that such effects may continue for the operational lifetime of the Scheme, although the Applicant anticipates that they would reduce as planting matures.
- 3.44 As noted in our comments on Chapter 7, reduced visibility of the Scheme should not in itself be assumed to result in an equivalent reduction in harm to heritage significance. Where openness, agricultural character, historic landscape relationships, settlement form, or the prominence and experience of a listed building or Conservation Area contribute to its significance, new planting may itself alter the contribution made by setting. Landscape screening should therefore be demonstrated to be appropriate to the significance and setting of the relevant heritage asset rather than treated as inherently beneficial heritage mitigation.
- 3.45 This issue is particularly apparent at paragraph 10.8.29, where the Applicant identifies a minor adverse effect upon Barn Cottages, equating to less than

substantial harm at the lowest end of the scale, but states that this would reduce to no harm once landscape screening has matured, anticipated to take approximately 30 years. A period of approximately 30 years represents a substantial part of the operational phase and should not simply be treated as an interim condition. The residual-effects reporting should clearly distinguish effects before and after the maturation of mitigation and demonstrate that any eventual conclusion of "no harm" derives from an assessment of significance rather than visibility alone.

- 3.46 There also appears to be an inconsistency in the assessment of Conservation Areas. Table 10-3 identifies Conservation Areas as Medium sensitivity receptors, whereas the later effects reporting appears to identify Fritton, Saxlingham Green and Brooke Conservation Areas as Low sensitivity.
- 3.47 Historic England requests clarification of this apparent inconsistency and recommend the applicant is asked to review their findings and then confirmation as to whether correction would alter any of the conclusions reached for the affected Conservation Areas.
- 3.48 **Reasonable worst case, operational lighting and permanent infrastructure.** Historic England welcomes the statement that the setting assessment has assumed solar infrastructure at its maximum permitted height. However, the reasonable worst case for heritage does not necessarily arise from maximum height alone. The siting, orientation and combination of Scheme components within the permitted parameters may also affect the relationship between development and a heritage asset. This is particularly relevant to substations, BESS infrastructure, pylons and other taller elements, and where Chapter 10 itself acknowledges that the effect upon a receptor may depend upon the eventual location of infrastructure within a parameter area.
- 3.49 We recommend the Applicant is asked to confirm that the assessment represents the reasonable worst case for effects upon heritage significance, taking account not only of maximum heights but also of the location and combination of Scheme components within the permitted Rochdale Envelope.
- 3.50 It is also not clear from Chapter 10 that potential effects from operational lighting have been considered as an aspect of setting. Chapter 4 identifies task/emergency and motion-activated security lighting associated with elements including substations, the National Grid Substation and BESS, while Chapter 10 identifies other operational setting effects including landscape change, visual intrusion, glare and noise. Where rural darkness and tranquillity contribute to the significance or experience of designated heritage assets, the Applicant should demonstrate that operational lighting would avoid or minimise harm and that appropriate controls are secured.

- 3.51 Historic England does, however, welcome the recognition that the Scheme is not wholly reversible following decommissioning. The heritage assessment should maintain a clear distinction between temporary/reversible solar infrastructure and permanent elements including the National Grid Substation and pylons, and should not rely upon eventual reversibility when considering effects arising from infrastructure that would remain.
- 3.52 **Archaeological impacts and additional mitigation.** Historic England welcomes the commitment to further archaeological investigation, particularly in areas which have not yet been fully investigated, including the Cable Route Corridor. We are also pleased to see that the potential archaeological effects of bentonite slurry associated with HDD have been considered.
- 3.53 There is, however, an apparent contradiction at paragraph 10.8.4, which states that further assessment has confirmed that there is no potential for direct impacts upon non-designated heritage assets, whereas the subsequent assessment identifies construction impacts upon archaeological assets. This should be clarified.
- 3.54 Historic England welcomes the range of archaeological mitigation identified in section 10.9, including further geophysical survey, informative trenching, geoarchaeological assessment where deep impacts are proposed, archaeological excavation, monitoring and preservation in situ. In applying this strategy, particular attention should be given to deposits with palaeoenvironmental potential, including peat, alluvium and River Terrace Deposits identified elsewhere within the ES, and to the potential effects of HDD and any associated dewatering.
- 3.55 The assessment should also address the implications of retained below-ground infrastructure following decommissioning, including whether retained cables and foundations could constrain or affect the effectiveness of future archaeological geophysical survey.
- 3.56 Subject to these points, Historic England welcomes the proposed archaeological mitigation strategy and agrees with the principle of prioritising avoidance/preservation in situ where significant archaeological remains are identified.
- 3.57 **Cumulative effects.** Historic England considers that the reasoning in section 10.11 for excluding cumulative harm to designated heritage assets requires further justification. The assessment identifies developments which may affect heritage receptors also affected by the Scheme, including development associated with the Grade I Church of St Michael. It nevertheless concludes that there is no potential for cumulative harm because the Scheme itself does not give rise to significant effects. The absence of a significant effect in EIA terms from East Pye when considered individually does not, by itself,

demonstrate that changes associated with East Pye could not combine with those arising from another development to affect the significance of the same heritage asset.

- 3.58 This is particularly important given the distinction made elsewhere within Chapter 10 between EIA significance and heritage harm: an effect which is not significant for EIA purposes may nevertheless amount to less than substantial harm to the significance of a designated heritage asset.
- 3.59 Historic England therefore recommends that the applicant is asked to reconsider the cumulative assessment for shared heritage receptors, including the Grade I Church of St Michael. The assessment should consider the combined changes to the setting and significance of the heritage asset arising from the relevant developments, rather than excluding cumulative harm principally on the basis that the effect of the East Pye Scheme considered in isolation is not significant in EIA terms.

Chapter 16: Ground Conditions

- 3.60 **Palaeoenvironmental potential of superficial deposits (Table 16.5).** This identifies the potential for organic deposits, such as peat, to be present in key areas. This includes Site 5, where Head has been recorded that can locally include lenses of peat, Site 7 where Alluvium has been recorded that can contain layers of peat, and the Cable Route Corridor where Head, Alluvium, River Terrace Deposits and peat have been recorded. All of these deposits have the potential to preserve evidence of how the landscape and environment changed over time, placing the archaeological sites into context. The River Terrace Deposits may also contain Palaeolithic archaeological remains.
- 3.61 Historic England recommends that the archaeological and palaeoenvironmental potential of these deposits is appropriately recognised in the assessment and in the design of subsequent investigation and mitigation.
- 3.62 **Ground investigation and geoarchaeological assessment.** Historic England notes that further ground investigation is proposed. Such investigation has the potential to help characterise and understand the sequence of deposits and their archaeological and palaeoenvironmental potential.
- 3.63 We recommend the applicant is asked to ensure that a geoarchaeologist is involved in designing the scope of this work and in assessing the results, to maximise the value of the information obtained. This is particularly relevant where peat, alluvium, River Terrace Deposits or other deposits with archaeological and palaeoenvironmental potential may be encountered.

- 3.64 **Dewatering and preservation of waterlogged remains.** Paragraph 16.7.2 identifies that temporary dewatering may be required. Historic England considers that it will be important to understand where dewatering may be necessary and the potential effect this could have upon the preservation of buried archaeological and palaeoenvironmental remains, particularly where peat or other waterlogged deposits occur. This should include establishing whether peat is present in the areas proposed for HDD launch and reception pits. The potential effects of drying or other changes to the preservation environment should be considered with reference to Historic England's *Preserving Archaeological Remains* (2016).
- 3.65 **Avoidance of peat deposits.** Historic England welcomes the approach to mitigating the potential loss of peat soils principally through design. We also welcome the proposed use of trenchless approaches within the Cable Route Corridor and the commitment at paragraph 16.8.15 to avoid shallow trenching where this would disturb peat deposits. This approach is supported, subject to the archaeological and palaeoenvironmental potential of the deposits also being appropriately considered as part of the investigation and mitigation strategy. We recommend the applicant is asked to confirm this is the case.

Volume 2

- 3.66 **Figures.** Historic England has reviewed the relevant figures in Volume 2 alongside the corresponding Environmental Statement chapters and supporting appendices. The Indicative Masterplan (Figure 4.1), Landscape and Visual figures (Figures 7.1–7.10) and Cultural Heritage Figure 10.1 provide useful spatial context for understanding the relationship between the Scheme, the surrounding landscape and designated heritage assets. Our comments on the assessment, including viewpoints, ZTV evidence and embedded design mitigation, are set out under Chapters 4, 7 and 10 and the relevant Volume 3 appendices and are not repeated here.
- 3.67 Where the heritage assessment relies upon spatial exclusions, setbacks, planting or other design measures illustrated by these figures, Historic England considers that these should be consistently reflected in, and appropriately secured through, the DCO plans and other control documents.

Volume 3

Appendix 7.2 and 7.3: Landscape Baseline and Landscape Assessment Tables

- 3.68 Historic England notes that these appendices provide useful evidence regarding landscape characteristics which may contribute to the setting and significance of designated heritage assets, including openness, rural character, tranquillity, settlement pattern and the relationship between plateau and valley landscapes. Of relevance is Site 8, identified as a landscape of

High value and High sensitivity, with a highly tranquil rural character and dark night skies, in proximity to Shotesham and Saxlingham Green.

- 3.69 The detailed assessment also identifies changes to rural character, tranquillity, openness and expansive skies arising from Scheme infrastructure, and acknowledges that mitigation planting may itself affect openness. This evidence should be appropriately reflected in the Cultural Heritage assessment where these characteristics contribute to heritage significance; reduced visibility through planting should not in itself be taken to demonstrate an equivalent reduction in harm.

Appendix 10.1: Heritage Statement

- 3.70 **Scope, information sources and relationship with the archaeological assessment.** Historic England notes that the Heritage Statement principally assesses the significance and settings of designated and non-designated heritage assets potentially affected by the Scheme. The methodology identifies heritage assets through searches of the NHLE, local authority information, Conservation Area Appraisals and Neighbourhood Plans, supplemented by viewshed analysis, site visits and heritage-specific visualisations. The assessment subsequently scopes in 51 designated heritage assets and two non-designated heritage assets for detailed assessment.

3.71 We note that section 3.6 identifies the information sources consulted. Although geological information is subsequently provided within the individual Site assessments, it is not clear from this section whether British Geological Survey borehole records have been considered. Such records can provide valuable information regarding archaeological and palaeoenvironmental potential, particularly where trenchless/HDD approaches are proposed. Historic England recommends that section 3.6 clarifies whether BGS borehole records have been consulted.

3.72 Sections 3.26–3.28 also distinguish designated assets from non-designated heritage assets, with Conservation Area Appraisals and Neighbourhood Plans used to identify the latter. As presently expressed, however, it is not entirely clear whether the non-designated heritage assessment within this appendix is intentionally focused upon historic buildings and other above-ground assets, with non-designated archaeological remains addressed principally through Appendix 10.2 and the other archaeological reports.

- 3.73 Historic England recommends that the applicant is asked to clarify the purpose and scope of Appendix 10.1, and that the relationship between the Heritage Statement and the separate assessment of non-designated archaeological and palaeoenvironmental remains is made explicit.

- 3.74 Historic England also notes that Table 3 does not identify any Scheduled Monuments within the study area for Sites 1, 3 and the BESS. Again, the applicant should clarify whether this reflects their absence from the relevant study area or their exclusion from the table.
- 3.75 **Approach to setting, visibility and heritage significance.** Historic England welcomes the use of its setting guidance and the combination of desk-based research, viewshed analysis, site visits and heritage-specific viewpoints, and notes that this work has influenced Scheme design. However, visibility is only one aspect of setting. Conclusions of "no harm" should demonstrably reflect the effect upon heritage significance, including where rural character, openness, historic land-use and settlement relationships or tranquillity contribute to significance, rather than principally the presence or absence of intervisibility.
- 3.76 **Grade I and Grade II* listed buildings.** Historic England welcomes the design changes made in response to the settings of the highest-grade listed buildings. For the Grade I Church of St Michael, the assessment expressly acknowledges that its rural setting contributes to its significance and that the southern fields of Sub-Site 4B contribute to the ability to appreciate that significance. Those fields have consequently been excluded from built development and retained as open land. This is a good example of heritage-led avoidance and should be appropriately secured.
- 3.77 Similarly, the setback from the Grade I Church of St Catherine and Fritton Conservation Area represents an important design response. The Heritage Statement concludes that keeping built elements out of the church's immediate vicinity will retain its prominence and rural setting, particularly on the approach along The Street. Historic England welcomes that principle.
- 3.78 For the Grade II* Old Rectory, however, the conclusion of no harm relies substantially upon the absence of views between the building and Site 4 and the approximately 500m separation from the nearest solar arrays. The assessment should be clear that this conclusion also reflects the significance of the Old Rectory and the contribution made by its wider rural and historic relationship with the Grade I church, rather than absence of visibility alone.
- 3.79 There is a similar issue with the Grade II* Oaks Farmhouse. The assessment itself establishes that Sub-Site 7L forms part of the farmhouse's wider historic agricultural setting, acknowledges a former tenurial relationship and concludes that the Sub-Site makes some contribution to significance. It then identifies a minor change arising from the solar arrays but concludes no harm, partly because new woodland will screen them after approximately 15 years.
- 3.80 Historic England considers that the assessment of Oaks Farmhouse should more clearly explain why the acknowledged change to land which contributes

to the significance of this Grade II* listed building results in no harm, independently of the eventual screening of the solar arrays. It should also consider whether the proposed woodland planting itself alters the agricultural character of the setting which the assessment identifies as contributing to significance. We recommend the applicant reviews this assessment and provides clarification.

- 3.81 **Conservation Areas and landscape mitigation.** Historic England welcomes the use of setbacks and development exclusions around Fritton, Saxlingham Green and Brooke/Kirkstead Conservation Areas. In particular, the Heritage Statement acknowledges that open agricultural land beyond these settlements can contribute to their setting.
- 3.82 There is nevertheless a recurring assumption that additional planting will necessarily improve the heritage outcome. The issue is especially clear at Saxlingham Green. Paragraphs 10.39–10.41 propose woodland, grassland and hedgerow planting and state that this will obscure the Scheme from the Conservation Area and "maintain the rural agricultural character and appearance". At the same time, the assessment acknowledges that presently open views westwards from the approach along Broaden Lane will be obscured by solar arrays, albeit with a setback retained closest to the Conservation Area.
- 3.83 Historic England welcomes the setback but we consider that the assessment should distinguish between screening the development and preserving the existing character of the setting. New woodland may be landscape mitigation while nevertheless changing an open agricultural relationship.
- 3.84 The Brooke and Kirkstead assessment is more explicit in recognising that the rural backdrop of open fields is identified in the Conservation Area Appraisal as an important element of setting. It concludes that the majority of the relevant land remaining open is sufficient to preserve the historic field pattern and relationship with the village. That reasoning is helpful, but should be applied consistently elsewhere.
- 3.85 Historic England therefore recommends that the applicant is asked to review the assessment of Conservation Areas distinguishes clearly between visual screening and conservation of those landscape characteristics which contribute to their significance, and that the relevant development exclusions and setbacks upon which the conclusions depend are appropriately secured.
- 3.86 **Site 8 and Shotesham.** Historic England notes that the Heritage Statement scopes the majority of designated heritage assets within the Site 8 study area out of detailed assessment, including the Grade II* Church of St Mary at Shotesham and Shotesham Conservation Area. The separate Landscape Baseline identifies Site 8 as a highly tranquil rural landscape of High

sensitivity and the Landscape Assessment identifies experiential change in the landscape between Shotesham and Saxlingham Nethergate.

- 3.87 Historic England therefore requests further explanation of the basis upon which the Grade II* Church of St Mary and Shotesham Conservation Area were scoped out. The assessment should demonstrate that this conclusion has considered the contribution made by the wider rural and valley landscape to the significance of these heritage assets, including relevant historic and spatial relationships, rather than relying principally upon direct intervisibility.
- 3.88 **Cable Route Corridor and overall conclusions.** Historic England recommends that section 15 cross-refers clearly to the archaeological assessment and mitigation strategy for these matters, including the potential for archaeological and palaeoenvironmental remains within areas affected by HDD and associated works. This would avoid expecting a built-heritage-focused Heritage Statement to duplicate the archaeological DBA while still ensuring the historic environment implications of the CRC are comprehensively signposted.
- 3.89 The overall conclusion at paragraphs 16.5–16.9 should be read with some caution. The Heritage Statement concludes that only Moulton Farmhouse and Barn Cottages would experience harm, with all other designated and non-designated heritage assets experiencing no harm. It also states that harm to Barn Cottages would reduce to no harm once screening matures, anticipated to take approximately 30 years. As set out in our Chapter 10 comments, 30 years is a substantial period of the operational phase and should not be treated simply as an interim condition.
- 3.90 Historic England recommends that the final conclusions clearly distinguish effects before and after landscape mitigation has matured and ensure that conclusions of "no harm" are based upon the effect upon heritage significance rather than visibility alone. This chapter therefor would need to be revised or the changes acknowledged.

Appendix 10.2: Archaeological Desk-Based Assessment

3.91 **Guidance and information sources.**

- **Sections 2.37–2.45** outline the professional guidance consulted. Historic England notes that the Archaeology and Solar Farms Good Practice Guide (2026) has not been referred to and recommends that this is included.
- **Section 3** identifies the information sources consulted. It is not stated whether BGS borehole records have been considered, despite these records providing valuable information about the archaeological and palaeoenvironmental potential of an area. This information is particularly useful in areas where trenchless/HDD approaches have been suggested as part of the Scheme.

- 3.92 **Archaeological and palaeoenvironmental potential.** The discussion of known archaeological remains within the different Sites demonstrates that archaeological remains dating between the prehistoric period and the modern day are present within the Scheme area. These include potentially complex sites such as settlements, moated sites and cemeteries.
- 3.93 However, the discussion of buried archaeological remains focuses principally on artefactual and structural evidence and does not adequately address palaeoenvironmental evidence. This information would assist in understanding the potential of the different Sites to address questions concerning matters such as economy and trade, and how the landscape and environment may have changed over time.
- 3.93 **Site-specific assessment of impacts.** The discussion of potential impacts upon sub-surface archaeology repeats substantially the same text for each Site, including potential impacts from the BESS, PV modules, piles and Cable Route Corridor.
- 3.94 Historic England recommends that these sections are made **site-specific**, focusing upon the impacts arising from the particular Scheme elements proposed within each Site and the archaeological and palaeoenvironmental remains which may consequently be affected.

Appendix 10.3: Archaeological Geophysical Survey Report

- 3.95 **Geophysical survey and alluvial deposits.** Paragraph 1.2 states that a fluxgate gradiometer survey was undertaken across the proposed Site. Section 4.3 also identifies alluvium in areas to the north and south of the watercourses between Tasburgh and Hempnall. Historic England notes that alluvial deposits can mask archaeological features and remains, and consequently magnetometry alone may not adequately characterise the archaeological potential of these areas. Alternative or complementary investigative techniques may therefore be required to characterise the deposits and evaluate their archaeological and palaeoenvironmental potential.

Appendix 10.5: Evaluation Trenching Report

- 3.96 1.5 states that evaluation trenching was carried out across nine of the ten Sites within the scheme. Historic England requests clarification as to why evaluation trenching was not undertaken within the tenth Site. Figure 2 also indicates that substantial areas, including the Cable Route Corridors, have not yet been investigated through trial trenching.

Appendix 10.6: Archaeological Mitigation Strategy

- 3.97 **Mitigation hierarchy and research objectives.** Historic England welcomes the preferred mitigation approach identified at section 2.1, which seeks to

conserve buried archaeological deposits through avoidance of archaeological remains.

3.98 Section 2.3 identifies the Research Framework questions to which the Scheme could contribute. Several of these concern the development of robust chronologies. Historic England therefore recommends that our guidance Radiocarbon Dating and Chronological Modelling (2022) is referred to and that a chronological modeller is included within the project team to provide appropriate support and advice and to assist in developing the chronological model.

3.99 **Archaeological Guidance.** Section 2.7 identifies the guidance which will inform the proposed archaeological work. The list does not include the relevant Historic England guidance relating to **scientific sampling, scientific dating or geoarchaeology/deposit modelling**. Historic England recommends that the relevant current guidance is incorporated, including that relating to:

- [environmental archaeology and geoarchaeology](#);
- [scientific dating](#);
- [human remains](#);
- [materials science and industrial processes](#); and
- [archaeological conservation](#).

3.100 **Further survey, Cable Route Corridor and geoarchaeology.** Section 3.5 states that geophysical survey will be undertaken in areas which were not previously available for survey, including where necessary within the Cable Route Corridor. Historic England considers that geophysical survey will be necessary within the Cable Route Corridor to enable areas of archaeological potential to be identified and appropriate mitigation developed. This could include micro-siting the cable route to avoid areas of archaeological potential and thereby avoid impacts upon buried remains.

3.101 Chapter 16 identifies the potential for organic deposits, including peat, within the Cable Route Corridor. The choice of evaluation technique in these areas will need careful consideration because peat and alluvium can mask archaeological features and remains.

3.102 Historic England welcomes the commitment at section 3.7 to investigate areas not previously subject to evaluation trenching post-consent. However, section 3.8 states that the need for geoarchaeological assessment will be agreed once the Scheme design has been finalised. Historic England considers that geoarchaeology and deposit modelling will be essential in areas subject to deep impacts, including piling and directional drilling, to characterise the deposits which will be affected and understand their archaeological and palaeoenvironmental potential.

- 3.103 **Written Schemes of Investigation and palaeoenvironmental sampling.** Section 4 sets out the Fieldwork Methodology. Section 4.6 states that the Archaeological Contractor will read the Archaeological Mitigation Strategy. Historic England would additionally expect the Archaeological Contractor to prepare a Written Scheme of Investigation (WSI) for each package of archaeological work.
- 3.104 The WSI should provide a detailed, site-specific strategy building upon the overarching AMS and enable relevant specialists to develop appropriate scientific sampling strategies for the sites being investigated. This is consistent with the ClfA Universal Guidance for Archaeological Excavation (2023).
- 3.105 Sections 4.27–4.31 set out the palaeoenvironmental sampling strategy. Further detail is required concerning the approaches to be used, required sample sizes and sample density, and the types of remains to be assessed, for example plant remains, charcoal, insects and pollen. Although bulk and column samples are identified, other forms of specialist sampling should also be incorporated where appropriate.
- 3.106 The palaeoenvironmental strategy should identify the research questions to be addressed, linked to the overarching research questions for the individual site and the Scheme as a whole. It should also build upon the results of the evaluation excavations and provide sufficient detail to establish what work will be required post-consent/pre-construction and what will be expected of the Archaeological Contractor.
- 3.107 Historic England notes that section 4.31 refers to Environmental Archaeology (2011). This guidance was revised in 2025 and the current Environmental Archaeology (2025) guidance should be used.
- 3.108 **Human remains.** Section 4.33 states that human remains will only be removed in exceptional circumstances. Historic England notes that *The Role of the Human Osteologist in Archaeological Fieldwork* (2018) advises that thorough archaeological evaluation normally requires excavation of burials to the base of the archaeological sequence within evaluation trenches. The proposed approach should therefore be reviewed against the relevant Historic England guidance.

4.0 Comments on draft DCO Order, Commitments Register, Outline Management Plans and Strategy Documents

Draft Development Consent Order [APP/3.1]

Article 2 – Interpretation

- 4.1 Historic England notes that the definition of “commence” excludes “permitted preliminary works”. These include intrusive archaeological surveys and other investigations, but also site clearance including vegetation removal and demolition of existing buildings and structures.
- 4.2 We recognise that archaeological evaluation and other preliminary investigations may need to take place before commencement. However, preliminary works capable of disturbing archaeological remains should remain subject to appropriate archaeological safeguards.
- 4.3 We therefore recommend the Applicant is asked to confirm, the definition of preliminary works and confirms how such works would be subject to archaeological control and how they would be included in the Outline Archaeological Mitigation Strategy and any necessary Written Scheme of Investigation prior to their undertaking.

Requirement 3 – Amendments to approved details

- 4.4 Requirement 3 provides a mechanism for amendments to certified documents and documents subsequently approved under the Requirements, subject principally to there being no materially new or materially different environmental effects.
- 4.5 Historic England considers that this should also ensure that amendments do not undermine heritage mitigation or design measures upon which the assessment of effects on the significance of heritage assets relies. Where a proposed amendment could materially affect such a measure, or otherwise affect the significance or setting of a designated heritage asset, appropriate consultation with the relevant heritage body should be secured.

Requirement 5 – Detailed design approval

- 4.6 Historic England welcomes the use of the Design Principles, Parameters and Commitments [APP/7.18] to control the detailed design of the Scheme. We note, however, an apparent inconsistency between that document and Requirement 5 of the draft DCO.
- 4.7 APP/7.18 states that the parameters and commitments contained in Tables 4.1–4.11 would be secured by Requirement 5. Requirement 5(1), however, applies the detailed design approval process only to Works Nos. 1, 2 and 3. It is therefore unclear to Historic England how the parameters and commitments identified in APP/7.18 for Works Nos. 4–11 are secured through Requirement 5.
- 4.8 This is of particular relevance to Works Nos. 4 and 5, which include the National Grid Substation and overhead grid connection infrastructure. These are substantial permanent elements of the Scheme and have the potential to affect the settings and significance of designated heritage assets.

- 4.9 Historic England recommends that the Applicant is asked to clarify and, where necessary, amends the draft DCO to ensure that the relevant parameters and commitments in APP/7.18 for Works Nos. 4 and 5 are appropriately secured. This should include those controls relating to siting, layout, scale, appearance and landscape mitigation where these are relied upon in the assessment of effects on heritage significance.

Requirement 7 – Landscape and Ecology Management Plan

- 4.10 Historic England welcomes Requirement 7 as the mechanism for securing the landscape measures identified in the Outline LEMP, including planting relied upon as part of the heritage-led design response. We also welcome the commitment for final tree species selection to have regard to Historic England guidance concerning the effects of roots upon archaeology. Where separate development exclusions or setbacks are relied upon as heritage mitigation, their securing is addressed below in relation to the Commitments Register.

Requirement 12 – Archaeology

- 4.11 Historic England welcomes Requirement 12 and the Archaeological Mitigation Strategy, which together provide the principal mechanism for securing further archaeological investigation and mitigation. We particularly welcome the provision for detailed project designs to inform the scope of archaeological mitigation and for preservation in situ or archaeological excavation where significant remains would otherwise be adversely affected.
- 4.12 The Archaeological Mitigation Strategy establishes an appropriate role for Norfolk County Council Historic Environment Service in agreeing and monitoring the archaeological works. Historic England does not consider it necessary to be consulted upon routine archaeological investigations. However, provision should be made for consultation with Historic England where further investigation identifies remains which may be of national significance, or where proposed mitigation may affect archaeological remains within our statutory remit.
- 4.13 We recommend that this escalation mechanism is made explicit within the Archaeological Mitigation Strategy and appropriately secured through Requirement 12. The applicant should be asked to confirm this.

Requirement 21 – Decommissioning

- 4.14 Historic England notes that the decommissioning provisions do not apply to Works Nos. 4 and 5. We understand that this reflects the potential retention of the National Grid Substation and associated grid connection infrastructure. This reinforces the need for the permanent effects and relevant design parameters of those works to be adequately controlled at the detailed design stage.

- 4.15 Historic England welcomes the provisions within the Archaeological Mitigation Strategy requiring a Decommissioning Strategy to be agreed with Norfolk County Council Historic Environment Service and requiring decommissioning compounds to avoid areas sensitive in archaeological and designated heritage asset setting terms. These provisions should remain secured through the DCO.

Schedule 15 – Procedure for discharge of requirements

- 4.16 Historic England notes that Schedule 15 establishes the procedure for consultation where a body is expressly identified as a consultee under an individual Requirement. Any amendment made in response to our comments on Requirement 12 should therefore ensure that the corresponding consultation arrangements are appropriately reflected in Schedule 15.

Consents and Agreements Position Statement [APP/7.22]

- 4.17 Historic England notes the Consents and Agreements Position Statement [APP/7.22], including the Applicant's position that certain archaeological consents are not required separately where development consent is granted.

We further note that no authorised development or other works are currently proposed within the boundary of a Scheduled Monument. We would not support any changes to the scheme which required works to a Scheduled Monument to be carried out under a DCO.

- 4.18 Subject to this clarification, and to our comments above concerning Requirement 12 and the Archaeological Mitigation Strategy, Historic England has no further comments on the additional consents and licences identified in APP/7.22.

Commitments Register [APP/7.26]

- 4.19 Historic England notes that the Commitments Register [APP/7.26] identifies a number of heritage-led design measures relied upon in the Cultural Heritage assessment, including development exclusions and specific setbacks from designated heritage assets. These include the setbacks at Sites 3, 4, 5 and 7 and the removal of parts of Sites 6, 8 and 9 from the built parameters of the Scheme.
- 4.20 The Commitments Register is not itself a secured document. While it identifies the Outline OEMP as the securing mechanism for the operational heritage mitigation and elsewhere identifies the Design Principles, Parameters and Commitments as the securing mechanism for certain minimum offsets and buffers, it is not clear to Historic England how each of the specific heritage-led development exclusions and setbacks is secured through the DCO. We request that the Applicant is asked to identify the relevant mechanism for securing these measures and, where necessary, is asked to amend the DCO

or certified documents to ensure that those relied upon in the assessment are appropriately secured.

5.0 Policy Considerations

- 5.1 The principal National Policy Statements relevant to the historic environment in this case are the Overarching National Policy Statement for Energy (EN-1) and National Policy Statement for Renewable Energy Infrastructure (EN-3). The National Planning Policy Framework (NPPF), revised in August 2026, is also relevant. The NPPF confirms that nationally significant infrastructure projects are determined in accordance with the Planning Act 2008 and the relevant National Policy Statements, together with any other matters which are relevant, which may include the Framework.
- 5.2 Section 5.9 of EN-1 addresses the historic environment. It recognises that the significance of heritage assets derives not only from their physical presence but also from their setting, and requires the Applicant's assessment to describe the significance of affected heritage assets, including the contribution made by setting. The assessment should also consider cumulative effects and impacts arising from noise, vibration, light and other indirect effects.
- 5.3 EN-1 requires the Secretary of State to identify and assess the particular significance of heritage assets which may be affected, including through development within their setting. Great weight should be given to the conservation of designated heritage assets, with greater weight given to more important assets. Any harm or loss of significance requires clear and convincing justification. Substantial harm to, or loss of significance of, assets of the highest significance, including Scheduled Monuments and Grade I and Grade II* listed buildings, should be wholly exceptional.
- 5.4 EN-1 also requires consideration of the desirability of sustaining and, where appropriate, enhancing the significance of heritage assets and the contribution of their settings. In considering development affecting the setting of a designated heritage asset, appropriate weight should be given to the desirability of preserving those elements of setting which make a positive contribution to significance.
- 5.5 EN-3 is particularly relevant to the proposed solar development. It requires applicants to take account of historic environment assessments in the design of their proposals and to consider measures to conserve heritage assets in a manner appropriate to their significance, including effects upon views important to their setting. It recognises that, because significance can derive from setting, the scale, design and prominence of large-scale solar development require careful consideration.

- 5.6 The National Planning Policy Framework (August 2026) introduces an updated framework for assessing effects upon heritage assets. Policy HE5 requires assessment to identify whether a proposal would have a positive effect, no effect, result in harm, or cause the total loss of the significance of a heritage asset. Where harm would arise, the degree of harm should be identified. HE5 also makes clear that it is the effect upon the significance of the heritage asset, rather than the scale of the development, which should be considered.
- 5.7 Policy HE6 requires substantial weight to be given to the conservation of a designated heritage asset, with greater weight given to more important assets. Any harm to a designated heritage asset is a matter of considerable importance and weight and, where harm would arise, the effect upon the asset and its significance should be weighed against any public benefits resulting from the proposal. Substantial harm to, or total loss of, assets of the highest significance, including Scheduled Monuments and Grade I and II* listed buildings, should be wholly exceptional.
- 5.8 The Framework also provides that non-designated heritage assets of archaeological interest which the decision-maker considers to be of equivalent significance to Scheduled Monuments should be considered subject to the policies for designated heritage assets (footnote 64). This is relevant where further archaeological investigation identifies remains of such significance within the Scheme.
- 5.9 Historic England notes that the terminology used in the August 2026 NPPF differs from that used in EN-1 and in parts of the submitted Environmental Statement. In this Written Representation we have therefore sought, where appropriate, to describe the effect of the Scheme upon the significance of the relevant heritage asset and the degree of any harm identified. References to “less than substantial harm” within the application documentation should be understood in the context of the policy framework applicable to that assessment; EN-1 continues to use that terminology.

6.0 Conclusion

- 6.1 Historic England considers that the Environmental Statement provides a broadly adequate basis for the Examination of the Scheme's effects upon the historic environment. We welcome the extent to which heritage considerations have informed the Scheme design, including development exclusions and setbacks which reduce effects upon the settings of designated heritage assets.
- 6.2 Notwithstanding these positive design changes, Historic England has identified a number of matters that we recommend are clarified or resolved

during the Examination. These principally concern the assessment of effects upon heritage significance through changes within setting; the distinction between visual screening and mitigation of harm to heritage significance; the reasonable worst case and cumulative assessment; and the securing of heritage mitigation and design commitments relied upon in the Environmental Statement.

- 6.3 In particular, Historic England requests that the Applicant demonstrates how the heritage-led development exclusions and setbacks relied upon in the Cultural Heritage assessment are secured through the DCO. The apparent inconsistency between Requirement 5 and the Design Principles, Parameters and Commitments should also be resolved, particularly in relation to the controls applying to the National Grid Substation and overhead grid connection infrastructure.
- 6.4 Historic England welcomes the archaeological mitigation framework provided through Requirement 12 and the Archaeological Mitigation Strategy. Subject to the detailed matters identified in this Written Representation, we consider that this provides an appropriate basis for further archaeological investigation and mitigation, with provision for Historic England's involvement where remains of potential national significance or matters within our statutory remit are identified.
- 6.5 Historic England will continue to engage with the Applicant and relevant local authorities during the Examination with the aim of resolving the outstanding matters identified in this Written Representation. Where matters are agreed, these will be recorded in the Statement of Common Ground being prepared with the Applicant.

Historic England, Cambridge

05/10/2026