



East Pye Solar
Statement of Common Ground: Historic England

Revision 1
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1 Introduction

1.1 Overview

- 1.1.1 This Statement of Common Ground (SoCG) has been prepared as part of the application for a Development Consent Order (DCO) (the Application) for East Pye Solar (the Scheme) made by East Pye Solar Limited (the Applicant) to the Secretary of State for Energy Security and Net Zero (SoS) pursuant to the Planning Act 2008 (PA 2008).
- 1.1.2 This SoCG does not seek to replicate information which is available within the Application documents available on the Planning Inspectorate's website ([Documents | East Pye Solar](#)).
- 1.1.3 This SoCG has been produced to confirm to the Examining Authority (the ExA) where agreement has been reached between the parties and where agreement has not yet been reached.

1.2 Parties to this Statement of Common Ground

- 1.2.1 This SoCG has been prepared by the Applicant and Historic England (HE). Collectively, the Applicant and HE are referred to as the parties.

1.3 Purpose of this Document

- 1.3.1 The SoCG covers topics of the Application within the remit and of relevance to HE.
- 1.3.2 This SoCG is a 'live' document and will be amended as the Examination progresses, including as more information becomes available and as a result of ongoing discussions between the parties to enable a final version to be submitted to the ExA.
- 1.3.3 The SoCG is intended to provide information for the Examination process, facilitate a smooth and efficient Examination, and manage the amount of material that needs to be submitted. For the purposes of Examination, this SoCG addresses key topic areas set out in **Table 1.1**. Each area of the topic has a unique reference which relate to the topic matter.

Table 1.1: Topic Referencing

Topic	Reference
Cultural Heritage	HE CH

1.4 Terminology

- 1.4.1 This SoCG summarises the main topics covered and the status of the matter, as outlined in **Table 1.2**.

Table 1.2: Status of Matters

Colour Code	Status
	Agreed – indicates where an issue has been resolved.
	Under Discussion – indicates where points continue to be the subject of on-going discussions wherever possible to resolve, or refine, the extent of disagreement between the parties.
	Not Agreed - indicates a position where both parties have reached a final position that a matter cannot be agreed between them.

2 Scheme Description

- 2.1.1 The Scheme is a Nationally Significant Infrastructure Project (NSIP) for the construction, operation and maintenance, and decommissioning of a solar photovoltaic (PV) electricity generating station with a total capacity exceeding 100 megawatts (MW) and associated development including a Battery Energy Storage System (BESS), up to three 132kV Project Substations and up to three 400kV Project Substations, Grid Connection Infrastructure and a new National Grid Substation.
- 2.1.2 The **Location Plan [APP-005]** shows the Order Limits for the Scheme, which is 1,212.3 hectares of land within South Norfolk (the 'Order Limits').

3 Current Position between the Applicant and Historic England

3.1 Matters of Discussion

- 3.1.1 The following tables set out the position of the parties by topics, identifying matters agreed, under discussion, or not agreed between the Applicant and HE at the point of this document being published.

3.2 Cultural Heritage

Table 3.1: Cultural Heritage

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
HE CH - 1	Assessment Scope and Methodology	ES Volume 1, Chapter 10 – Cultural Heritage [APP-046], ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – APP-168], ES Volume 3, Appendix 10.2 – Archaeological Desk-Based Assessment [AS-020 – AS-021], ES Volume 3, Appendix 10.3 – Archaeological Geophysical Survey [AS-022], ES Volume 3, Appendix 10.4 – Aerial Investigation Mapping Survey [AS-023 – AS-024], ES Volume 3, Appendix 10.5 – Evaluation Trenching Report [APP-172], ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173] ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041]	Historic England (HE) notes that the Applicant has provided an appropriate assessment of the location, type and significance of designated and non-designated heritage assets. HE further notes that heritage receptors have therefore been considered in the design of the Scheme, and a robust approach to mitigation has been proposed.	The Applicant considers that the assessment provided within ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] and its supporting Appendices within ES Volume 3 are in line with appropriate legislation, policy and guidance, with the methodology adopted also in line with appropriate guidance and derived following consultation with HE and other relevant stakeholders. The baseline conditions, which are detailed within this Chapter, are representative of the baseline site conditions. The evolution of the design, as detailed within ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041] has taken into account cultural heritage receptors. The Applicant considers that the embedded and proposed mitigation measures are appropriately reflected in the assessment of effects within ES Volume 1, Chapter 10 – Cultural Heritage [APP-046].	Agreed
HE CH – 2	Assessment Scope and Methodology	ES Volume 1, Chapter 10 – Cultural Heritage [APP-046]	In earlier stages, HE stated that they will make further comments regarding the cumulative impact of the Scheme with the adjacent 'Tasway Energy Park' scheme and associated BESS projects, which are identified as areas of concern. During discussions prior to examination, HE acknowledge that the Tasway Energy Park is on hold and at the time of drafting this SOCG, does not need to be considered as a cumulative scheme.	The applicant has sought to assess all cumulative schemes in accordance with The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) and the Planning Inspectorate's Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment. The EIA Regulations require the assessment to take into account 'the cumulation of effects with other existing and/or approved projects...' (Schedule 4, paragraph 5(e)) and the same is required by the Planning Inspectorate's Advice on Cumulative Effects Assessment. The Tasway Energy Park project is on indefinite hold and is no longer identified on the Planning Inspectorates website as a DCO project.	Agreed

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
				Should the Tasway Energy Park project ever proceed, the cumulative effects of the East Pye Solar and Tasway Energy Park projects would need to be assessed in full as a part of the Tasway Energy Park DCO application in accordance with the aforementioned guidance. The Applicant would then give consideration to whether it needs to be considered as a cumulative scheme.	
HE CH – 3	Siting of Scheme elements	ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] Design Principles, Parameters and Commitments [APP-213]	HE states they broadly support the approach to the siting of the BESS (with 400kV substation) and National Grid Substation in Site 1.	The Applicant welcomes the broad support for the siting of these elements within the Order Limits.	Agreed
HE CH – 4	Archaeology within the Cable Route Corridor	ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173]	HE states they will be commenting upon the methodologies and mitigation strategy of the proposed Cable Route Corridor (CRC) and identifies this as a likely area of concern.	HE states in HE CH – 9 of their Relevant Representation [RR-0769] that they will not be commenting upon impacts to archaeological sites in detail and will be deferring to the LPA and their expert and specialist advisors. The Applicant notes that as outlined in both ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] and ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173] , further stages of archaeological works will be carried out, across the CRC, including both geophysical survey and informative trenching. It has been agreed with NCCHES that the amount and location of any additional trenching will be targeted on areas of higher impact and will be proportionate to the cumulative impact of all elements of the Scheme, including the CRC.	Under Discussion
HE CH – 5	Additional Mitigation (Trenching and post-trenching mitigation within the Sites)	ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173]	HE notes that certain areas within the Order limits have not been fully assessed through archaeological evaluation, and there is still potential that previously unknown archaeological sites which are of equivalent value to a designated heritage asset could be identified. They further note that the DCO would need to contain provisions for further evaluation prior to commencement of the development, revision of assessment of impact, and proportionate mitigation as necessary.	HE states in HE CH – 9 of their Relevant Representation that they will not be commenting upon impacts to archaeological sites in detail and will be deferring to the LPA and their expert and specialist advisors. The various below ground impacts of the scheme have been discussed with the NCCHES and have been used to inform ES Volume 3, Appendix 10.6 Archaeological Mitigation Strategy [APP-173] . In consultation with NCCHES, the Archaeological Mitigation Strategy has been designed to have flexibility to allow for appropriate archaeological mitigation once full details of the Scheme impacts are known.	Under Discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
				Requirement 12 of the Draft DCO [AS-032] requires a programme of archaeological investigation to be carried out in accordance with the archaeological mitigation strategy.	
HE CH – 6	Setting of Designated Heritage Assets	ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – APP-168]	HE states their main concerns regarding the historic built environment relate to the impact upon the setting of one Scheduled Monument, two Grade I Listed Buildings, two Grade II* Listed Buildings, 42 Grade II Listed Buildings and four Conservation Areas. They further state that they will be specifically providing comments on the Scheduled Monument, Grade I and II* Buildings and Conservation Areas.	The Applicant acknowledges that Historic England will be commenting upon impacts to the settings of the aforementioned 51 heritage assets, which were taken forwards for more detailed assessment within ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – APP-168] .	Under Discussion
HE CH – 7	Setting of Designated Heritage Assets	ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – APP-168] ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041] Outline OEMP [APP-197] Outline LEMP [APP-199]	HE recognises that as a result of the Scheme, there are going to be changes to the setting of designated heritage assets and, in some cases, these changes would result in a significant effect which is likely to equate to harm to the significant of these assets in Policy terms. They further note that the implementation of the proposed mitigation would be likely to reduce the level of impact and therefore heritage harm, however residual effects are likely to remain. HE requires that adequate mitigation to reduce impacts is secured in the DCO and accompanying documents, so magnitude of impacts to designated heritage assets is minimised.	The evolution of the design, as detailed within ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041] has taken into account cultural heritage receptors. As detailed within section 10.7 of ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] , as well as within the Outline OEMP [APP-197] and Outline LEMP [APP-199] , mitigation will include setbacks as well as visual screening, including linear native tree belts, enhanced hedgerows, and tree planting, to be secured through a Requirement of the Draft DCO [AS-032] . In ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] , it is concluded that with embedded mitigation in place, during the Construction Phase there would be a neutral effect, which is not significant, and during the Operational Phase, there would be a neutral – minor adverse effect to some designated heritage assets, which is also considered to be not significant. During the Decommissioning Phase, any effects would be reduced back to neutral. Following the adoption of embedded and additional mitigation measures, it was concluded that the residual effects for the majority of designated heritage assets would be a neutral effect, which is not significant. For the Listed Moulton Farmhouse, it was concluded that there would be a low-negligible impact upon this asset, which would result in a minor adverse effect, but which is considered to be not significant.	Under Discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
				As Moulton Farmhouse is Grade II Listed, HE, as stated in HE CH – 6 in their Relevant Representation, will not be commenting on this asset, and will be leaving discussion of impacts of Grade II Listed Buildings to the Local Planning Authority.	
HE CH – 8	Visualisations	ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] and ES Volume 3: Appendix 7.1 – Appendix 7.6 [APP-121 – 146] ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] and ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – APP-168]	HE notes the provision of visualisations and LVIA specific to the historic environment and they are looking to ensure the information provided within the ES is consistent with what had been previously discussed and is appropriate.	Heritage specific viewpoints are addressed within ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] . Photomontages are included as an Annex to ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – APP-168] , with additional viewpoints also included within ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] . A virtual meeting between the parties was conducted October 2025 to discuss the proposed heritage specific view locations and a plan demonstrating these was sent to the Interested Party by the Applicant.	Under Discussion
HE CH – 9	Non-Designated Heritage Assets and Archaeological Sites	ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] , ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – APP-168] , ES Volume 3, Appendix 10.2 – Archaeological Desk-Based Assessment [AS-020 – AS-021] , ES Volume 3, Appendix 10.3 – Archaeological Geophysical Survey [AS-022] , ES Volume 3, Appendix 10.4 – Aerial Investigation Mapping Survey [AS-023 – AS-024] , ES Volume 3, Appendix 10.5 – Evaluation Trenching Report [APP-172] , ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173]	HE states the Scheme will result in a range of potentially significant impacts on non-designated heritage assets and archaeological sites; however, they will not be commenting on this matter in detail and will defer to the LPA and their expert and specialist advisors.	The Applicant notes that impacts to non-designated built-heritage assets were assessed within ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – APP-168] . The Applicant also notes that archaeological impacts, as identified within ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] have been discussed with the NCCHEs, with these discussions used to inform ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173] .	Under Discussion
HE CH – 10	Further Heritage Advice and Comments		HE states that they will be making further comments and recommendations regarding the following in their Written Representation: Cumulative impacts;	As stated within ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] , no designated heritage assets fall within the Order Limits.	Under Discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
			• Impacts of the Scheme upon the significance of designated heritage assets both within the Order Limits and in its vicinity; • Archaeological mitigation; • Approach to mitigation; • The DCO working, specifically Requirement 12 – Archaeology; • The Outline Archaeological Mitigation Strategy.	The Applicant notes these points and would welcome further discussion with HE as part of the Statement of Common Ground.	

4 Signatories

4.1.1 The above SoCG is agreed between East Pye Solar Limited (the Applicant) and Historic England, as specified below.

4.1.2 Duly authorised for and on behalf of East Pye Solar Limited.

Name:	
Job Title:	
Date:	
Signature:	

4.1.3 Duly authorised for and on behalf of Historic England.

Name:	
Job Title:	
Date:	
Signature:	

Appendix A Record of Engagement

A.1.1 The parties have engaged during the pre-application stage, including technical meetings. In addition, the following stages of consultation has taken place:

- Non-statutory consultation ('Phase One' consultation) held between 23 October and 6 December 2024;
- Statutory consultation ('Phase Two' consultation) held between 18 June and 6 August 2025; and
- Targeted consultation held between 22 October and 26 November 2025.

A.1.2 A summary of meetings and key correspondence that have taken place between the parties in relation to the Application is provided in **Table A.1**.

Table A-1: Record of Engagement

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
Cultural Heritage		
12 February 2025	Scoping Opinion	• Confirmation of designated heritage assets to be scoped in for further assessment • Impacts of substations on designated heritage assets • What should be included in the Environmental Statement (ES) chapter • Use of ZTVs in assessment • Potential direct and indirect impacts on the historic environment
6 August 2025	PEIR Response	• Requirement for an archaeological evaluation and the formulation of an Archaeological Mitigation Strategy (AMS) / Outline Written Scheme of Investigation (WSI) • Potential impacts on buried archaeological remains from piling, contaminants, use of Bentonite, tree planting and compaction from construction vehicles. • Potential impacts of the scheme on future geophysical survey • Geoarchaeological assessment including use of borehole data

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
		- Heritage specific viewpoint analysis - Clarity of figures accompanying future assessments
17 October 2025	Virtual Meeting	- Heritage specific viewpoints including a breakdown by the Applicant of proposed viewpoint locations on a site by site basis (from Site 1 through to Site 10) reviewing in detail the surrounding designated heritage assets considered to be sensitive to the proposals - Identification by Applicant of possible setting issues and explanation of embedded mitigation including landscape proposals and setbacks - Brief overview of remaining key topics raised by the Interested Party at PEIR stage. These were not discussed in detail as the Interested Party representative with archaeological area of interest was not present at the virtual meeting. It was instead agreed by the parties to further correspond on these through email, starting with a bullet point list from the Applicant of remaining issues/comments raised by the Interested Party
20 October 2025	Email Correspondence	A plan showing proposed heritage-specific viewpoints was sent by the Applicant to the Interested Party.
21 October 2025	Email Correspondence	- As agreed during the Virtual Meeting, a bullet point list of remaining issues/comments was sent by the Applicant to the Interested Party. These included: - Requirement for archaeological trial trenching – email confirmed that trial trenching was ongoing and had been agreed with Norfolk County

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
		Council Historic Environment Service (NCCHEs) ○ Request for clarification on potential impacts on future geophysical survey. The sites have already been subject to geophysical survey and any impacts on significant remains will have been mitigated prior to the operational phase. We also cannot predict what technological advances will be made in the intervening period. ○ Impacts of Bentonite and whether there were any mitigation measures the Interest Party would be seeking for this ○ The limitations of BGS borehole data within the environs of the Order Limits ○ Potential impacts on geoarchaeological remains
6 November 2025	Email Correspondence	• Update on ES submission date from the Applicant and request for a response from the Interested Party on the issues/comments raised in the virtual meeting and previous email correspondence
10 November 2025	Email Correspondence	• Interested Party confirmed they would respond in the following weeks.
21 November 2025	Email Correspondence	• Two further issues/comments were sent to the Interested Party by the Applicant along with a request for clarification: choice of tree species and clarity of figures for further assessments
26 November 2025	Email Correspondence	• Confirmation from the Interested Party that the information the Applicant had provided on choice of tree species is sufficient.

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
		Clarification from Interested Party on their request for more interpretable figures including cones/arrows, improving colour contrast/hierarchy, use of appropriate scale and layout, and consistency of mapping conventions
14 July 2026 14 August 2026 24 August 2026	Email Correspondence	- Email to discuss Relevant Representation and SoCG points. Response received 27 August 2026 - Confirmed Written Representation will be provided to PINS by 6 October 2026; - Confirmed HE will not be providing detailed comments regarding GII Listed Buildings; - HE will be providing comments on archaeological matters; and - Virtual meeting arranged for 14 September 2026 to discuss SoCG.
02 September 2026	Email Correspondence	Draft SoCG shared with HE
14 September 2026	Meeting	Meeting to discuss the SoCG
29 September 2026	Email	Correspondence on the SoCG and confirmation of positions ahead of Deadline 1.