

This is the Written Representation of Mrs Jane Shearer, registered Interested Party, in respect of the East Pye Solar Project (EN0110014). This document supersedes and replaces an earlier version submitted in September 2026. The representation objects to the inclusion of Site 8 (Sub-Sites 8A and 8B) in the Order Limits on grounds of severe harm to the Hawes Green heritage cluster within the Shotesham Conservation Area, material methodological failures in the Landscape and Visual Impact Assessment and Residential Visual Amenity Assessment, two material factual errors in the visual baseline (ES Appendix 7.4), and inadequate mitigation. The full grounds are set out in the attached document.

WRITTEN REPRESENTATION

East Pye Solar — Planning Inspectorate Reference EN0110014

Revision Note: A previous version of this Written Representation was submitted in September 2026 by email. This document supersedes and replaces that earlier version in its entirety. This revision incorporates additional grounds arising from further review of ES Appendix 7.8 (Residential Visual Amenity Assessment, APP/6.3.7.8, Revision 1, March 2026) and should be read as Mrs Jane Shearer's definitive Written Representation for the purposes of this examination.

To: The Examining Authority, The Planning Inspectorate

Project Reference: EN0110014 (East Pye Solar Project)

Submitted by: Mrs Jane Shearer — Interested Party

Property: [REDACTED]

Interested Party Reference: [REDACTED]

Date: 28 September 2026

Subject: Formal Written Representation — Objection to East Pye Solar Project (EN0110014): Severe Harm to the Historic Setting and Immediate Approach of the Hawes Green Heritage Cluster; Material Methodological Failures including Flawed RVAA Methodology; Factual Errors in the Visual Baseline; and Inadequate Mitigation (Site 8)

Dear Examining Authority,

I am writing to submit my formal Written Representation objecting to the proposed East Pye Solar Project, specifically concerning the placement of Site 8 (Sub-Sites 8A and 8B) and its severe, unmitigated impact on Hawes Green and the Shotesham Conservation Area.

[REDACTED]. The cluster comprises:

- Old Hall Barn — Grade II listed [REDACTED]
- Church View Barn — Grade II listed [REDACTED]
- Old Hall Farm — Grade II listed [REDACTED]
- St Mary's Church, Shotesham St Mary — Grade II* listed, Historic England List Entry 1050642 (prominent hilltop medieval church [REDACTED]
[REDACTED] Grade II* is a designation held by only approximately 6% of all listed buildings in England)
- Remains of the Church of St Martin, Shotesham — Grade II listed, Historic England List Entry 1152468 (medieval standing ruin approximately 100 metres from St Mary's)

- Wider residential properties on Hawes Green and Rogers Lane — all within the Shotesham Conservation Area

Sub-Site 8B, the nearest element of Site 8, is situated approximately 1.2 miles (approximately 1.9km) to the east and south-east along Brooke Road. The industrial footprint of Site 8 will be acutely visible from Hawes Green [REDACTED] and will permanently and fundamentally alter the immediate landscape context, historic approach, and rural setting of this entire heritage cluster.

I base my objections on the following grounds, each supported by reference to ES Chapter 7 (APP/6.1.7), ES Appendix 7.4 (APP/6.3.7.4), and ES Appendix 7.8 (APP/6.3.7.8), all Revision 1, March 2026.

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

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

Introducing 4.5 metre high industrial solar tracker arrays approximately 1.2 miles to the east and south-east breaks the historic group value and rural tranquillity that connects these five designated assets, and permanently destroys the landscape context that residents and visitors experience daily when approaching and moving within the Conservation Area. The land rises from approximately 30 metres above ordnance datum at the valley floor to as high as 42 metres AOD on the higher eastern ground within Sub-Site 8A. At maximum tracker inclination of 60 degrees, panels on that higher ground will reach approximately 46.5 metres AOD — significantly above the elevation of the historic walking routes on Hawes Green at approximately 38 metres AOD.

The Court of Appeal confirmed in *Barnwell Manor Wind Energy Ltd v East Northamptonshire DC [2014]* that the Section 66 duty requires decision-makers to give 'considerable importance and weight' to harm to listed buildings and their settings, with even greater force for Grade II* assets. National Policy Statement EN-1 requires wholly exceptional justification for harm to the setting of a Grade II* asset. The National Planning Policy Framework requires clear and convincing justification for harm to Grade II* and Grade II listed buildings. Neither threshold has been met because the harm has not been properly assessed.

ES Chapter 7 contains no viewpoint assessment from or toward St Mary's Church (Grade II*) or St Martin's Church (Grade II). I request that the Examining Authority satisfies itself that ES Chapter 10 (Cultural Heritage) addresses the Section 66 duty with the weight required by the Barnwell Manor judgment, that NPS EN-1 wholly exceptional justification has been provided, and that Historic England's concerns raised in their Section 56 Relevant Representation (EN0110014-000340) have been addressed.

Ground 2: Material Methodological Failures and Factual Errors in the Visual Assessment

2.1 The RVAA Has Pre-emptively Excluded Hawes Green Without Assessment

ES Appendix 7.8 (APP/6.3.7.8, Revision 1, March 2026) presents the Residential Visual Amenity Assessment for the scheme. Having reviewed this document, I have identified that the RVAA methodology has been specifically designed in a manner that excludes the Hawes Green heritage cluster from assessment entirely, on grounds that are not justified by reference to the specific characteristics of Site 8.

Paragraph 2.1.11 of the RVAA states that an initial desk-based study was carried out to identify residential properties within 500 metres of the maximum development parameters. Paragraph 2.1.13 then states:

“Properties within the 100m study area were individually numbered and assessed in accordance with RVAA methodology (Steps 2 and 3). Two properties out of twenty properties within this 100m area were found to meet the threshold for further RVAA assessment. Given the low likelihood of significant visual effects and the absence of other qualifying receptors within the 100m range, no further detailed assessment has been carried out on residential properties located beyond this 100m offset from the maximum development parameters.”

The Property at Hawes Green is located approximately 1.6km from Sub-Site 8B — well beyond the 500 metre initial study area. The RVAA has been deliberately scoped to exclude the Hawes Green heritage cluster. The only property assessed for Site 8 in the entire RVAA is Dawsons Farm on Wash Lane, described as approximately 30 metres from Sub-Site 8A. No property at Hawes Green, Shotesham St Mary or within the Shotesham Conservation Area has been assessed.

The justification for the 500 metre restriction is that the scheme is classified in RVAA paragraph 2.1.8 as a ‘very large but lower profile structure’, citing TGN 2/19. I submit that this classification is wholly unjustified for Site 8 specifically:

- Site 8 is rated as High value, High susceptibility and High sensitivity by the Applicant’s own assessment in Table 7.3 of ES Chapter 7 — the only solar site in the entire 1,100 hectare scheme to receive this rating. It is not comparable to a standard large but lower profile development.
- The scheme includes Single Axis Tracker Panels at a maximum height of 4.5 metres at greatest inclination. TGN 2/19 guidance on very large but lower profile structures was not written with 4.5 metre rotating tracker panels in mind.
- The cross-valley topography between Site 8 and Hawes Green means that distance does not provide the same screening protection it would on flat ground. The RVAA methodology takes no account of the elevated viewing position at Hawes Green at 38 metres AOD looking toward panels on rising ground reaching 42 metres AOD.
- The pre-emptive conclusion in paragraph 2.1.13 that there is a low likelihood of significant visual effects beyond 100 metres was reached without any assessment of the specific topography, sightlines or heritage context of the

Hawes Green cluster. For the highest sensitivity landscape site in the scheme, this conclusion is an assertion unsupported by evidence.

I submit that the RVAA methodology for Site 8 is fundamentally flawed, and that the Examining Authority should require the Applicant to justify the 500 metre study area restriction and to conduct a proper RVAA from the Hawes Green heritage cluster.

2.2 Absence of Residential Visual Amenity Assessment from Hawes Green in the LVIA

The failure in the RVAA is compounded by parallel failures in the LVIA. The following specific failures are confirmed by ES Chapter 7:

- Table 7.4 of ES Chapter 7 lists 21 assessed viewpoints for Sites 7 and 8 combined. Hawes Green does not appear as a named receptor or viewpoint location in any of them.
- ES Chapter 7 paragraph 7.5.22 explicitly states that potential visual effects are likely to be experienced from ‘settlement edges of... Shotesham’. Having acknowledged Shotesham as a settlement from which visual effects are likely, the Applicant has then failed to assess any residential receptor viewpoint within Shotesham St Mary or Hawes Green. This is a direct internal inconsistency.
- ES Chapter 7 paragraph 7.7.14 confirms that solar PV panel development within Sub-Sites 8A and 8B has been excluded in proximity to residential properties ‘and from Shotesham’. This acknowledgement that Shotesham is a sensitive residential receptor makes the absence of any viewpoint assessment from within the settlement inexplicable.
- Table 7.3 of ES Chapter 7 confirms that Site 8 is rated High value, High susceptibility and High sensitivity — the only solar site in the entire scheme to receive this rating. Despite this, neither the LVIA nor the RVAA has assessed the visual impact on Hawes Green.
- The ES acknowledges that ‘glimpses’ and ‘glimmers’ of the solar arrays will be visible from the historic public footpaths around St Mary’s Church. An acknowledgement of visible glimpses from a Grade II* churchyard path is a legal acknowledgement of an unmitigated line of sight. The developer cannot simultaneously claim the impact is insignificant and admit visibility from those footpaths. Furthermore, Historic England’s GPA3 guidance explicitly recognises that sequential and kinetic views experienced along approach routes to a heritage asset form part of its setting and cannot be dismissed as merely transient.

By treating Hawes Green solely as a transient, recreational footpath receptor and restricting the RVAA to 500 metres, the developer has avoided the requirement under TGN 2/19 to evaluate the permanent impact on the domestic curtilage and primary living outlook of the listed properties at Hawes Green.

2.3 Two Material Factual Errors Concerning Highfield — Wrong Property Type and Wrong Location

ES Appendix 7.4 (APP/6.3.7.4, Section 2.9, Table 2.17) identifies a visual receptor described as ‘Highfield Lodge Holiday Home’ in the context of Site 8. This identification contains two distinct and compounding factual errors:

Error A — Wrong Property Type

The property is not a commercial holiday lodge. It is a permanent residential dwelling — Highfield House — forming part of the established residential cluster within the Shotesham Conservation Area. A permanent residential receptor commands a higher sensitivity rating under TGN 2/19 than a transient holiday let, resulting in an underestimate of visual impact from the outset.

Error B — Wrong Location on the Masterplan Maps

The developer’s own masterplan maps place ‘Highfield Lodge Holiday Home’ off Highfield Road in Brooke — near Sites 9 and 10 — over a mile from Hawes Green. The cumulative effect of these two errors is that the permanent residential and heritage cluster at Hawes Green — the most sensitive residential and heritage receptor in the vicinity of Site 8 — has been effectively erased from the visual baseline assessment entirely.

I request that the Examining Authority requires the Applicant to correct both errors and to reassess the visual impact on the Hawes Green cluster on the correct factual basis.

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

3.1 The Hedge Screening Fallacy

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

- The proposed hedgerows are planted at valley-bottom level at approximately 30 metres AOD. Hawes Green is elevated at approximately 38 metres AOD.
- A 3 metre hedgerow at 30 metres AOD reaches only 33 metres AOD — five metres below the elevation of the Property and well below the line of sight toward panels on rising ground within Sub-Site 8A reaching up to 46.5 metres AOD at maximum tracker inclination.
- Solar tracker panels rotate to face east in morning hours — directly toward Hawes Green — presenting their maximum surface area and height of 4.5 metres at 60 degrees inclination at the times of day when residents are most likely to be using their curtilage.

3.2 The Woodland Screening Fallacy

The Applicant relies on existing woodland blocks between St Mary’s Church and Site 8 to provide visual screening. This woodland consists predominantly of native

deciduous species that completely lose their canopy for approximately six months of every year. During autumn, winter, and spring, the 4.5 metre industrial arrays will be visible through bare winter branches from the historic footpaths around St Mary's Church and from the immediate approach routes to the Hawes Green cluster.

Over the 40-year operational lifespan of the scheme, this constitutes approximately 20 years of unscreened seasonal visual exposure. This is not adequate mitigation. It is a permanent, recurring, and entirely foreseeable harm that the developer has failed to adequately address.

Requests to the Examining Authority

For the reasons set out above, I respectfully request that the Examining Authority:

- (a).** Requires the Applicant to justify the restriction of the RVAA study area to 500 metres for Site 8, given that Site 8 is the only solar site in the scheme rated as High sensitivity landscape (Table 7.3, ES Chapter 7), that tracker panels reach 4.5 metres at greatest inclination, and that the cross-valley topography creates direct sightlines from elevated positions at Hawes Green toward Site 8 at distances well beyond 500 metres;
- (b).** Requires the Applicant to conduct a proper Residential Visual Amenity Assessment from the Hawes Green heritage cluster in accordance with TGN 2/19, assessing the impact of Sub-Sites 8A and 8B in tracker panel configuration at maximum inclination (4.5 metres, 60 degrees, morning-east orientation) from the elevated ridge position at approximately 38 metres AOD, and to explain why the pre-emptive conclusion in RVAA paragraph 2.1.13 applies to a heritage cluster containing a Grade II* church;
- (c).** Requires the Applicant to confirm whether Hawes Green falls within the ZTV for Site 8 (Figure 7.5.4) and, if so, to explain why neither the LVIA nor the RVAA has assessed the visual impact on this location, given that ES Chapter 7 paragraph 7.5.22 acknowledges Shotesham as a settlement from which visual effects are likely;
- (d).** Requires the Applicant to produce a viewpoint assessment from or toward St Mary's Church (Grade II*, List Entry 1050642) and the Remains of St Martin's Church (Grade II, List Entry 1152468), assessing sequential and kinetic views in accordance with Historic England GPA3;
- (e).** Requires the Applicant to correct the two material factual errors in ES Appendix 7.4 Table 2.17 concerning 'Highfield Lodge Holiday Home' — the misclassification as a commercial holiday lodge and the incorrect map placement in Brooke — and to reassess the visual impact on the Hawes Green heritage cluster on the correct factual basis;
- (f).** Requires the Applicant to produce a verified line-of-sight topographical cross-section from the St Mary's Church footpath directly to the western boundary of Site 8, to demonstrate mathematically whether the proposed 3 metre hedgerow screening is geometrically capable of screening panels on rising ground from Hawes Green at 38 metres AOD;

(g). Requires the Applicant to assess the seasonal screening effectiveness of the existing deciduous woodland specifically during the six-month leafless period from October to April;

(h). Satisfies itself that ES Chapter 10 (Cultural Heritage) has adequately assessed the impact of Site 8 on the settings of St Mary's Church (Grade II*, List Entry 1050642) and the Remains of St Martin's Church (Grade II, List Entry 1152468), and that the Section 66 duty has been discharged with the considerable importance and weight required by Barnwell Manor [2014], that NPS EN-1 wholly exceptional justification has been provided, and that the NPPF clear and convincing justification test has been met;

(i). Gives full weight to Historic England's concerns about cumulative heritage impacts raised in their Section 56 Relevant Representation (EN0110014-000340) and to the independent Landscape Architect's assessment that harm to the Shotesham Conservation Area from Site 8 would be significant;

(j). Conducts an Accompanied Site Inspection from the historic footpath routes around St Mary's Church and from Hawes Green, to assess first-hand the vulnerability of this exceptional heritage cluster; and

(k). Includes this Written Representation in the evidence considered at any Issue-Specific Hearing relating to landscape and visual impact and cultural heritage.

The developer has failed to respect the settings of multiple high-tier heritage assets at Hawes Green. The RVAA (APP/6.3.7.8) has restricted its study area to 500 metres and pre-emptively concluded there is a low likelihood of significant visual effects beyond 100 metres, without conducting any assessment of the Hawes Green heritage cluster — a conclusion that is unjustified for the only solar site in the scheme rated as High sensitivity landscape. The visual baseline in ES Appendix 7.4 contains two compounding material factual errors that have erased the most sensitive receptor cluster from the assessment. The proposed screening is geometrically incapable of working from the elevated ridge position. The deciduous woodland provides no screening for six months of every year. And the Section 66 duty owed to the Grade II* listed St Mary's Church has not been adequately discharged.

Site 8 is rated as the highest sensitivity landscape site in the entire 1,100 hectare scheme by the Applicant's own assessment. It should not be consented on the basis of an assessment that contains a pre-emptive RVAA exclusion, material factual errors, internal contradictions, and fundamental gaps of the kind identified above.

Yours faithfully,



Mrs Jane Shearer



Email: 

Phone: 

This document is an Addendum to my Written Representation submitted on 28/09/2026 Jane Shearer Written Representation (FINAL doc) It should be read alongside that document and does not replace it.

The Addendum makes two corrections and additions: first, it corrects the distance to Site 8 stated in my Written Representation from 1.2 miles (road distance) to the correct straight-line distances as the crow flies — the nearest physical boundary of Sub-Site 8A along Market Lane is approximately 820 metres [REDACTED]; and second, it strengthens the argument concerning the Residential Visual Amenity Assessment (APP/6.3.7.8), noting that [REDACTED] is only 320 metres beyond the developer's own 500 metre RVAA study area threshold, making the pre-emptive exclusion of the Hawes Green heritage cluster from assessment even less justifiable than previously stated.

ADDENDUM TO WRITTEN REPRESENTATION

East Pye Solar — Planning Inspectorate Reference EN0110014

To: The Examining Authority, The Planning Inspectorate

Submitted by: Mrs Jane Shearer — Interested Party

Property: [REDACTED]

Interested Party Reference: [REDACTED]

Date: 1st October 2026

Relates to: Written Representation submitted 28th September 2026

Subject: Addendum — Correction of Distances to Site 8 and Strengthened RVAA Exclusion Argument

Dear Examining Authority,

I write to submit a brief addendum to my Written Representation submitted on 28/09/2026. I have identified that references throughout that document to the distance between [REDACTED] and Site 8 stated the distance as approximately 1.2 miles. This figure reflected road distance rather than straight-line distance as the crow flies. Having calculated the precise straight-line distances using the grid references for Sub-Sites 8A and 8B as set out in the Environmental Statement, I wish to correct this and draw the Examining Authority's attention to the significance of the corrected figures for the RVAA exclusion argument.

1. Corrected Straight-Line Distances

The correct straight-line distances from [REDACTED], Hawes Green to the nearest elements of Site 8, calculated using the sub-site grid references stated in the ES, are as follows:

- Western boundary of Sub-Site 8A along Market Lane (nearest physical boundary of the site): approximately 820 metres — approximately 0.51 miles as the crow flies
- Sub-Site 8B centre: approximately 930 metres (0.93km) — under one mile as the crow flies
- Sub-Site 8A centre: approximately 1,070 metres (1.07km) — approximately 0.66 miles as the crow flies

The road distance via Brooke Road is approximately 1.2 miles, which is the figure referenced in my earlier submission. All references to 1.2 miles in my Written Representation should be read as referring to road distance. The straight-line distances as the crow flies are considerably shorter, as set out above.

2. Significance for the RVAA Exclusion Argument

The corrected distances significantly strengthen the ground set out in section 2.1 of my Written Representation concerning the Residential Visual Amenity Assessment (APP/6.3.7.8, paragraph 2.1.13).

The western boundary of Sub-Site 8A along Market Lane is only approximately 820 metres from [REDACTED]. This means [REDACTED] is only 320 metres beyond the developer's own 500 metre RVAA study area boundary. [REDACTED] is therefore not a remote or distant receptor that might reasonably be excluded — it sits just outside the study area threshold by a margin of 320 metres.

This marginal exclusion is wholly unjustified in circumstances where:

- Site 8 is the only solar site in the entire 1,100 hectare scheme rated as High value, High susceptibility and High sensitivity by the Applicant's own assessment (Table 7.3, ES Chapter 7)
- [REDACTED] sits at 38 metres AOD — confirmed by GPS survey — looking across a valley floor at approximately 30 metres AOD where the nearest panels along Market Lane would be located. This cross-valley elevated sightline means distance does not provide the same screening protection it would on flat ground
- A 3 metre screening hedge at valley-bottom level (30m AOD) reaches only 33 metres AOD — confirmed from ES Chapter 7 paragraph 7.7.20 — which is 5 metres below the elevation of [REDACTED]. The proposed screening is therefore geometrically incapable of providing any benefit from [REDACTED] ridge position, regardless of distance
- Tracker panels at valley floor level (30m AOD) at maximum inclination (4.5m, confirmed from ES Chapter 4 Table 4.1) reach 34.5 metres AOD — fully visible from [REDACTED] at 38m AOD looking across and down the valley slope
- [REDACTED] forms part of a heritage cluster containing a Grade II* listed church and four further designated heritage assets within the Shotesham Conservation Area

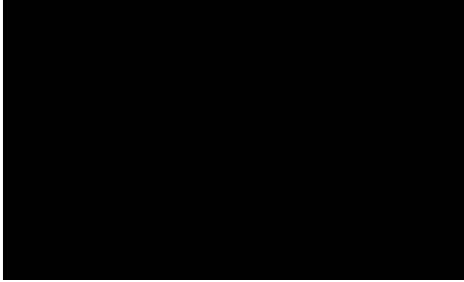
The pre-emptive conclusion in RVAA paragraph 2.1.13 that there is a low likelihood of significant visual effects beyond 100 metres was reached without any site-specific assessment of the topographical relationship between Site 8 and the Hawes Green heritage cluster. For a receptor only 820 metres from the site boundary — 320 metres beyond the study area threshold — with a confirmed cross-valley elevated sightline, this conclusion is an assertion unsupported by any evidence, which leaves everyone just guessing.

I note that the Examining Authority has been requested in my Written Representation to require a verified topographical cross-section from the St Mary's Church footpath

to the western boundary of Site 8. Such a cross-section would establish definitively whether and to what extent the panels are visible from [REDACTED] elevated ridge position, and would resolve the uncertainty that the developer's pre-emptive RVAA exclusion has created.

This Addendum should be read alongside my Written Representation submitted on 28/09/2026 and is intended to correct and supplement, not replace, the grounds set out in that document.

Yours faithfully,

A large black rectangular redaction box covering the signature area.

Mrs Jane Shearer

A black rectangular redaction box covering a line of text, likely an address.

Email: [REDACTED]

Phone: [REDACTED]