Planning Inspectorate
Arolygiaeth Gynllunio

SCOPING OPINION:

Proposed East Pye Solar

Case Reference: EN0110014

Adopted by the Planning Inspectorate (on behalf of the Secretary of State) pursuant to Regulation 10 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

25 February 2025

TABLE OF CONTENTS

1. INTRODUCTION....1

2. OVERARCHING COMMENTS....3

2.1 Description of the Proposed Development....3
2.2 EIA Methodology and Scope of Assessment....6

3. ENVIRONMENTAL ASPECT COMMENTS....9

3.1 Air Quality....9
3.2 Water Environment....12
3.3 Major Accidents and Disasters....15
3.4 Electric, Magnetic and Electromagnetic Fields....16
3.5 Telecommunications, Television Reception and Utilities....17
3.6 Glint and Glare....18
3.7 Lighting....20
3.8 Minerals....21
3.9 Waste and Materials....22
3.10 Socio-Economics....23
3.11 Human Health....24
3.12 Arboriculture....25
3.13 Ground conditions....26
3.14 Landscape and Visual....27
3.15 Ecology and Biodiversity....30
3.16 Cultural Heritage....37
3.17 Transport and Access....39
3.18 Noise and Vibration....41
3.19 Climate Change....44
3.20 Soils and Agricultural Land....46
3.21 Cumulative and in-Combination Effects....48

APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED

APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES

1. INTRODUCTION

1.0.1 On 15 January 2025, the Planning Inspectorate (the Inspectorate) received an application for a Scoping Opinion from East Pye Solar Limited (the applicant) under regulation 10 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) for the proposed East Pye Solar (the proposed development). The applicant notified the Secretary of State (SoS) under regulation 8(1)(b) of those regulations that they propose to provide an Environmental Statement (ES) in respect of the proposed development and by virtue of regulation 6(2)(a), the proposed development is 'EIA development'.

1.0.2 The applicant provided the necessary information to inform a request under EIA regulation 10(3) in the form of a Scoping Report, available from:

https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN0110014/documents

1.0.3 This document is the Scoping Opinion (the Opinion) adopted by the Inspectorate on behalf of the SoS. This Opinion is made on the basis of the information provided in the Scoping Report, reflecting the proposed development as currently described by the applicant. This Opinion should be read in conjunction with the applicant's Scoping Report.

1.0.4 The Inspectorate has set out in the following sections of this Opinion where it has / has not agreed to scope out certain aspects / matters on the basis of the information provided as part of the Scoping Report. The Inspectorate is content that the receipt of this Scoping Opinion should not prevent the applicant from subsequently agreeing with the relevant consultation bodies to scope such aspects / matters out of the ES, where further evidence has been provided to justify this approach. However, in order to demonstrate that the aspects / matters have been appropriately addressed, the ES should explain the reasoning for scoping them out and justify the approach taken.

1.0.5 Before adopting this Opinion, the Inspectorate has consulted the 'consultation bodies' listed in appendix 1 in accordance with EIA regulation 10(6). A list of those consultation bodies who replied within the statutory timeframe (along with copies of their comments) is provided in appendix 2. These comments have been taken into account in the preparation of this Opinion.

1.0.6 The Inspectorate has published a series of advice pages, including 'Advice Note 7: *Environmental Impact Assessment: Preliminary Environmental Information, Screening and Scoping* (AN7)'. AN7 and its annexes provide guidance on EIA processes during the pre-application stages and advice to support applicants in the preparation of their ES.

1.0.7 Applicants should have particular regard to the standing advice in AN7, alongside other advice notes on the Planning Act 2008 (PA2008) process, available from:

'Nationally Significant Infrastructure Projects: Advice pages'

1.0.8 This Opinion should not be construed as implying that the Inspectorate agrees with the information or comments provided by the applicant in their request for an opinion from the Inspectorate. In particular, comments from the Inspectorate in this Opinion are without prejudice to any later decisions taken (e.g. on formal submission of the application) that any development identified by the applicant is necessarily to be treated as part of a Nationally Significant Infrastructure Project (NSIP) or associated development or development that does not require development consent.

2. OVERARCHING COMMENTS

2.1 Description of the Proposed Development

(Scoping Report Chapters 2 and 3)

ID	Ref	Description	Inspectorate's comments
2.1.1	Para 3.4.4	Installation of photo voltaic (PV) module mounting frames	The Scoping Report states that the frames upon which the solar PV panels will be mounted will be pile driven or screw mounted into the ground. The option to install concrete blocks known as 'shoes' may also be considered, avoiding the need for driven and screw anchored installation. The ES should assess the installation method to be used, or where this is still to be determined, a worst case scenario should be adopted, noting that this may vary depending on the aspect/receptor, to identify any LSE.
2.1.2	Section 3.7	Battery Energy Storage System (BESS)	The description of the physical characteristics and technical capacity of the BESS should be developed in the ES to include details such as battery technology type/ specification and anticipated number of containerised battery units.
2.1.3	Para 3.9.3	Underground cables	The ES should describe the likely routeing, trench width and depth and working width for the underground cabling. The works required to install the cables should be described, including any dewatering of excavations and crossings.
2.1.4	Section 3.11	Access points	The ES should indicate where the proposed access points are for the Proposed Development. This should include a figure displaying the location of the existing agricultural access tracks and any new proposed access tracks.
2.1.5	Table 3.1	Horizontal Directional Drilling (HDD)	The Inspectorate notes that no design parameters have been provided for the proposed HDD. The ES should contain these parameters and demonstrate whether they are likely to encounter any groundwater bodies. The Applicant's attention is drawn to the consultation response from the Environment Agency (EA) (Appendix 2 of this opinion) for further information.

ID	Ref	Description	Inspectorate's comments
2.1.6	Section 3.13	Mitigation and Enhancement measures	Clear differentiation should be made in the ES between measures intended to mitigate LSE and measures provided for purposes of enhancement.
2.1.7	Para 3.15.3	Temporary Construction Compounds	The Scoping Report states that the Proposed Development would require temporary construction compounds within the site, however, the exact location is yet to be determined. To ensure a robust assessment of likely significant effects, the ES should provide details regarding the number, location and dimensions of construction compounds.
2.1.8	Section 3.16	Operation	The ES should describe the potential scope and duration of maintenance works that would be required during operation of the Proposed Development, including predicted vehicle movements and staffing numbers. Details should also be provided on any monitoring to be undertaken.
2.1.9	Section 3.17	Decommissioning	The ES should provide a description of the activities and works which are likely to be required during decommissioning of the Proposed Development, including the anticipated duration. Where significant effects are likely to occur as a result of decommissioning the Proposed Development, these should be described and assessed in the ES. Any proposals for restoration of the site to agricultural or other use should also be described.
2.1.10	Paras 4.4.9 to 4.4.11	Flexibility	The Inspectorate notes the Applicant's intention to apply a 'Rochdale Envelope' approach to maintain flexibility within the design of the Proposed Development. The Inspectorate expects that at the point an application is made, the description of the Proposed Development will be sufficiently detailed to include the design, size, capacity, technology, and locations of the different elements of the Proposed Development or where details are not yet known, will set out the assumptions applied to the assessment in relation to these aspects. This should include the footprint and heights of the structures (relevant to existing ground levels), as well as land-use requirements for all elements and phases of the development. The description should be supported (as necessary) by figures, cross-sections, and drawings which should be clearly and appropriately referenced. Where flexibility is sought, the ES should clearly set out and justify the maximum design

ID	Ref	Description	Inspectorate's comments
			parameters that would apply for each option assessed and how these have been used to inform an adequate assessment in the ES.

2.2 EIA Methodology and Scope of Assessment

(Scoping Report Chapter 4)

ID	Ref	Description	Inspectorate's comments
2.2.1	Para 4.4.8	Professional Judgement	The ES should clearly identify where professional judgement has been relied upon to determine the level of significance of effects. Any use of professional judgement to assess significance should be fully justified within the ES.
2.2.2	Section 4.5	Alternatives	The ES should provide full details of alternative sites, layouts and energy generation technologies considered for the Proposed Development. This should include a comparison of the environmental effects.
2.2.3	Section 4.7	Mitigation	Effort should be made to agree any proposed mitigation measures with the relevant consultation bodies, and it should be clear how these are secured through the DCO or other legal mechanism. Where any off-site mitigation is proposed, the additional area should be included in the red line boundary and assessed in the ES where significant effects are likely to occur.
2.2.4	Para 5.1.1	Assessment of wind microclimate and daylight, sunlight and overshadowing	The Scoping Report proposes to scope out an assessment of wind microclimate and daylight, sunlight and overshadowing of all phases on the basis that the proposed development is not anticipated to result in likely significant effects on wind microclimate, daylight, sunlight and overshadowing. Based on the location and the parameters set out in the Scoping Report, the Inspectorate agrees that this matter can be scoped out as significant effects are unlikely to occur, and these aspects can be scoped out of further assessment.
2.2.5	N/A	Transboundary	The Inspectorate on behalf of the SoS has considered the proposed development and concludes that the proposed development is unlikely to

ID	Ref	Description	Inspectorate's comments
			have a significant effect either alone or cumulatively on the environment in a European Economic Area State. In reaching this conclusion the Inspectorate has identified and considered the proposed development's likely impacts including consideration of potential pathways and the extent, magnitude, probability, duration, frequency and reversibility of the impacts. The Inspectorate considers that the likelihood of transboundary effects resulting from the proposed development is so low that it does not warrant the issue of a detailed transboundary screening. However, this position will remain under review and will have regard to any new or materially different information coming to light which may alter that decision. Note: The SoS' duty under regulation 32 of the 2017 EIA Regulations continues throughout the application process. The Inspectorate's screening of transboundary issues is based on the relevant considerations specified in the annex to its Advice Page 'Nationally Significant Infrastructure Projects: Advice on Transboundary Impacts and Process', links for which can be found in paragraph 1.0.7 above.

3. ENVIRONMENTAL ASPECT COMMENTS

3.1 Air Quality

(Scoping Report Section 5.2)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.1.1	Section 5.2, Table 5.2	Assessment of air quality effects during construction (construction dust)	The Scoping Report proposes to scope out an assessment of dust emissions during the construction phase on the basis that a construction dust risk assessment will be undertaken to determine the risk of dust impacts to sensitive receptors and identify appropriate mitigation measures that would be incorporated into the Outline Construction Environmental Management Plan (OCEMP). On this basis the Inspectorate agrees to scope this matter out provided that the OCEMP provides information on the general construction works, location of identified sensitive receptors, identified mitigation and how would it be delivered.
3.1.2	Section 5.2, Table 5.2	Assessment of air quality effects during construction (exhaust emissions from non-road mobile machinery (NRMM)	The Scoping Report proposes to scope this matter out on the basis that NRMM would adhere to the emission standards as set out in European Directive 2016/1628. The Inspectorate agrees to scope this matter out provided that the ES includes information on the type, number, location and operational hours of use of NRMM to demonstrate that no likely significant effects will occur.
3.1.3	Section 5.2, Table 5.2	Assessment of air quality effects during construction (road traffic emissions and vehicle routing)	The Scoping Report proposes to scope out an assessment of traffic emissions during the construction phase. However, paragraph 5.2.18 of the Scoping Report estimates that a maximum of approximately 108 daily two-way Heavy Good Vehicle (HGV) movements during the peak construction Period which exceed the EPUK / IAQM screening criteria. On this basis, the Inspectorate does not agree to scope this matter out. The ES should include an assessment of road traffic emissions during construction which are likely to

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			result in significant effects or otherwise present a justification in the ES as to why significant effects are not likely to occur.
3.1.4	Section 5.2, Table 5.2	Assessment of air quality effects during operation (road traffic emissions and combustion plant)	The Scoping Report proposes to scope out emission from combustion plant, and road traffic exhaust emissions during operation. This is on the basis of the nature of the Proposed Development, that no combustion plant is proposed and that there would only be limited movement of vehicles to the application site for maintenance purposes. The Inspectorate agrees that it is unlikely that the operation of the Proposed Development would generate significant emissions to air or significant operational traffic and that these matters can be scoped out of the assessment. The ES must however provide information on the nature of vehicle movements during the operational phase including the type and scale of maintenance activities, frequency, estimated number of vehicle movements (alone and cumulatively) and confirm that these projections fall below the relevant thresholds set out in guidance. The ES project description should also confirm that there would be no emissions from operational plant that require further assessment.
3.1.5	Section 5.2, Table 5.2	Emissions to air from BESS fire event	The Scoping Report proposes to scope out this matter given the unlikely event of a fire at the BESS compound. Paragraph 5.2.27 of the Scoping Report states that the design of BESS would not be located closer than 100m to human receptors and this will be secured and would be included in the Outline Battery Safety Management Plan to be submitted with the DCO application. On this basis the Inspectorate agrees that this matter can be scoped out.
3.1.6	Section 5.2, Table 5.2	Assessment of air quality effects during decommissioning	The Scoping Report states that effects during the decommissioning phase will be similar to or less than those during the construction phase and proposes to scope out this matter on the basis that mitigation would be managed via the implementation of an Outline Decommissioning Environmental Management Plan (ODEMP). On the basis that likely significant effects have been identified for the construction phase, the Inspectorate does not agree to scope out an assessment of decommissioning. The ES should include an assessment of dust emissions arising from activities and road traffic emissions during decommissioning which are likely to result in significant effects or otherwise present a

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			justification in the ES as to why significant effects are not likely to occur. It should be clear how all mitigation measures would be delivered and secured, through cross reference to the ODEMP and DCO.

ID	Ref	Description	Inspectorate's comments
3.1.7	N/A	Guidance	The Applicant's attention is drawn to the Defra advice 'PM2.5 Targets: Interim Planning Guidance'. The ES should explain how key sources of air pollution within the proposed development have been identified and how action has been taken to minimise emissions of PM2.5 or its precursors.

3.2 Water Environment

(Scoping Report Section 5.3)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.2.1	Section 5.3, Table 5.3	Impacts to: • Water quality • Surface water run-off	The Scoping Report proposes these matters out of all phases on the basis of a commitment to best practice measures in the OCEMP, ODEMP and a drainage strategy to manage water runoff during operation. Based on the information provided and the nature of the Proposed Development, the Inspectorate agrees that significant impacts to water quality are not likely to occur. This matter can be scoped out from the ES.
3.2.2	Section 5.3, Table 5.3	Water resources – all phases	The Scoping Report proposes to scope this matter out on the basis that measures outlined in the OCEMP and ODEMP will be sufficient to avoid significant effects. The Inspectorate notes that the site is located within an area designated as 'water stressed' by the Environment Agency. As such, the Inspectorate is not in a position to scope this matter out. The ES should assess the potential impact of the proposed development on water resources where there is potential for significant effects to occur and include details relating to the water supply and demand requirements during the construction and operational phases of the proposed development..
3.2.3	Section 5.3, Table 5.3	Flood Risk – all phases	The Scoping Report proposes to scope out an assessment of flood risk for all phases of the proposed development on the basis that significant effects on surface water and flood risk are not expected with the proposed embedded mitigation measures implemented. The Inspectorate notes that a Flood Risk Assessment (FRA) will be prepared and accompany the application as a technical appendix to the ES. The Inspectorate is content with this approach. The FRA should be based on the requirements of the Environment Agency standing advice. This should include a description of how the proposed development satisfies the

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			requirements of the sequential and exception tests, where relevant. The FRA should demonstrate that the proposed development includes suitable mitigation measures and flood resilient construction that will allow the development to remain operational for its 60-year lifespan. This includes confirming that all the flood sensitive equipment associated with the proposed development remains operational during a 0.1% event. Furthermore, the FRA should consider the surface water drainage/flood risk impacts that may occur off site and the potential of increased flood risk beyond the site boundary. This should include consideration of the potential for the solar installation to increase the rate of runoff from the site. The Applicant's attention is drawn to the comments from the Environment Agency (Appendix 2 of this Opinion) regarding the FRA.

ID	Ref	Description	Inspectorate's comments
3.2.4	Paragraphs 5.3.23, 5.3.24 and 8.7.2	Water Framework Directive (WFD) assessment	The Scoping Report does not make any reference to a WFD assessment, although paragraphs 5.3.23 and 5.3.24 identify WFD waterbodies. Paragraph 8.7.2 of the Scoping Report indicates that there are potential of new watercourse or ditch crossings, and it is unknown whether potential crossings are for vehicles, cable routing etc. Given the potential for likely significant effects, and in the absence of further detail regarding what type of crossings are proposed and the location of these or potential impacts on WFD waterbodies. The ES should provide a WFD assessment (or a screening assessment detailing why a full assessment is not required) to inform the ES assessment. The approach and findings should be agreed with the relevant statutory consultees. The Applicant's attention is drawn to the comments from the Environment Agency (Appendix 2 of this Opinion) regarding the WFD assessment.
3.2.5	Annex 4	Private water supplies	The Inspectorate notes that a number of private water supplies are within 250m of the site. The Scoping report does not provide accurate location and abstraction data for these water supplies. Adopting a worst-case scenario that each private abstraction is for potable use and requiring Source Protection Zone 1 buffers, without accurate locations it is difficult to

ID	Ref	Description	Inspectorate's comments
			ascertain whether the Proposed Development site overlies these designated buffers. The ES should identify the location of and assess the potential impacts to private water supplies and their buffers, where there is the potential for significant effects.

3.3 Major Accidents and Disasters

(Scoping Report Section 5.4)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.3.1	Section 5.4, Table 5.4	Major accidents and disasters (MA&D)	The Scoping Report proposes to scope out MA&D. Table 5.4 of the Scoping Report describes possible MA&D that the applicant considers could be relevant to the Proposed Development. It identifies a number of events that are proposed to be scoped out of further assessment and the reasons for that approach. The Inspectorate agrees that these matters can be scoped out of the ES on the basis of the information presented. The Inspectorate notes that an Outline Battery Safety Management Plan (OBSMP) is proposed to be submitted with the DCO application. The Inspectorate expects that the information on the fire risk associated with battery storage facilities and relevant mitigation, such as fire-fighting and containment measures on the environment should be set out in the OBSMP.

ID	Ref	Description	Inspectorate's comments
3.3.2	Section 5.4, Table 5.4 and Appendix 5.2	Unexploded Ordnance (UXO)	The UXO constraints assessment contained in Appendix 5.2 Phase 1 Ground Conditions Assessment (Volume III) of the Scoping Report has identified that the site has moderate to high potential of UXO constraint associated with historical military airfields and aircraft crashes. The Inspectorate notes that no further surveys are proposed regarding this risk. As such, the nature and extent of the risk remains unclear. The Applicant should commit to further UXO surveys in order to identify the full extent of this risk and inform appropriate mitigation.

3.4 Electric, Magnetic and Electromagnetic Fields

(Scoping Report Section 5.5)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.4.1	Section 5.5	Electric, Magnetic and Electromagnetic Fields (EMF)	The Scoping Report seeks to scope out EMF on the basis that embedded design measures will be incorporated within the proposed development to avoid the potential for EMF effects on human and ecological receptors and the risk of EMF based on the design will be set out and explained within 'Other Matters' chapter within the ES. However, paragraph 3.6.9 of the Scoping Report states that the grid connection infrastructure to include overhead lines (potentially up to 400kV) may be required. Given the uncertainty surrounding cabling design and proximity to receptors, the Inspectorate does not agree to scope this matter out. The ES should address the risks to human and ecological receptors arising from EMF to the extent that it is relevant to the nature of the development, taking into account relevant technical guidance, and where significant effects are likely to occur. The Inspectorate considers that the ES should set out the design measures to be implemented to avoid the potential for likely significant effects in line with DECC's Voluntary Code of Practice 2012. See also comment ID 3.15.17 for the Inspectorates opinion on impacts to fish.

ID	Ref	Description	Inspectorate's comments
3.4.2	N/A	N/A	N/A

3.5 Telecommunications, Television Reception and Utilities

(Scoping Report Section 5.6)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.5.1	Section 5.6	Telecommunications, television reception and utilities	The Inspectorate considers that insufficient evidence has been provided to scope this matter out. The ES should identify any receptors through consultation and a desk-based assessment and should any diversions of utility or telecommunications infrastructure be required, these should be located and described in the ES along with any required mitigation measures. Impacts, including those from potential diversions and alterations in design, should be described and assessed where significant effects are likely to occur. The Applicant's attention is drawn to the comments from National Highways, Health and Safety Executive, Cadent Gas Limited and Anglian Water Services (Appendix 2 of this Opinion) regarding the above and underground utilities.

ID	Ref	Description	Inspectorate's comments
3.5.2	N/A	N/A	N/A

3.6 Glint and Glare

(Scoping Report Section 5.7)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.6.1	Section 5.7 and Table 5.6	Glint and Glare aspect chapter	The Scoping Report proposes to scope out a glint and glare aspect chapter in the ES. The Scoping Report states that a detailed glint and glare assessment for operation of the proposed development will be undertaken and accompany the application as a technical appendix to the ES and summarised within the 'Other Matters' chapter of the ES. The Inspectorate is content with the proposed approach and agrees that a standalone glint and glare chapter does not need to be included in the ES. However, the Inspectorate considers that potential significant glint and glare effects during construction and decommissioning phases also need to be considered in the standalone glint and glare assessment. Information on the nature of construction and decommissioning activities and the distances to receptors to demonstrate that no significant effects during these phases should also be included. The technical appendix to the ES must clearly explain the assessment methodology to indicate the likely extent and distance of potential glint and glare. Where professional judgement has been applied this should be identified. The 'Other Matters' chapter of the ES should identify any significant effects resulting from glint and glare. ES aspect chapters (eg LVIA, Cultural Heritage) should cross refer to the glint and glare assessment where relevant.

ID	Ref	Description	Inspectorate's comments
3.6.2	Paragraphs 5.7.6 to	Study area	The Scoping Report states that a 1km study area is applied to identify ground-based receptors and 500m study area is applied to identify railway receptors. The Inspectorate notes that a preliminary Zone of Theoretical Visibility (ZTV) will be conducted to identify the potential visibility of the proposed development. See also comment I.D. 3.14.7 for the

ID	Ref	Description	Inspectorate's comments
			Inspectorates opinion on this matter. The applicant is advised to use this ZTV to identify ground-based sensitive receptors with potential views of the site, which may be affected by glint and glare. The ES should justify the choice of study area and sensitive receptors with reference to the extent of the likely impacts. Effort should be made to agree these details with relevant consultation bodies.

3.7 Lighting

(Scoping Report Section 5.8)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.7.1	Section 5.8	Lighting Assessment – All Phases	An assessment of lighting is proposed to be scoped out on the basis that lighting during construction and decommissioning will be controlled by measures outlined in a Construction Environmental Management Plan (CEMP) and Decommissioning Environmental Management Plan (DEMP) and lighting during operation is to be motion based and not continuous. Whilst the Inspectorate agrees that a standalone assessment of lighting is not required, it is not content to scope this matter out entirely. For the avoidance of doubt, impacts from lighting should still be considered within other aspect chapters where relevant.

ID	Ref	Description	Inspectorate's comments
3.7.2	N/A	N/A	N/A

3.8 Minerals

(Scoping Report Section 5.9)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.8.1	Paras 5.9.3 and 5.9.4	Assessment of Minerals – All phases	The Scoping Report proposes to scope out an assessment of Minerals on the basis that, whilst the Proposed Development will sterilise sand and gravel mineral resources, extraction of these resources is not economically viable due to nearby constraints. The Inspectorate disagrees that the sterilisation of these minerals would not be significant. Furthermore, there is no evidence that this has been discussed with the relevant mineral planning authority. The ES should include an assessment of the potential impact of loss of access to mineral resources during the development's lifetime and assess significant effects where they are likely to occur. This should be informed by consultation with the relevant mineral planning authority.

ID	Ref	Description	Inspectorate's comments
3.8.2	N/A	N/A	N/A

3.9 Waste and Materials

(Scoping Report Section 5.10)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.9.1	Section 5.10	Waste and Materials – All Phases	The ES proposes to scope out an assessment of waste and materials on the basis that the best practices measures and principles of the waste hierarchy is to be applied to the Proposed Development and a Site Waste Management Plan (SWMP) is to be implemented and included within the 'Other Matters' chapter of the ES. The Inspectorate considers that insufficient information has been provided on the expected waste arisings associated with the Proposed Development. As such, the Inspectorate is currently not in a position to scope this matter out. The ES should provide an assessment of waste and materials across all phases of the Proposed Development. This should include a detailed description of waste streams, including expected quantities of waste arisings and any monitoring measures required to ensure compliance.

ID	Ref	Description	Inspectorate's comments
3.9.2	N/A	N/A	N/A

3.10 Socio-Economics

(Scoping Report Section 5.11)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.10.1	Section 5.11	Socioeconomics – All Phases	An assessment of socioeconomics is proposed to be scoped out on the basis that whilst both positive and adverse effects are predicted, they are either considered not significant or assessed in other aspect chapters within the ES. The Inspectorate considers that insufficient baseline information has been provided to rule out significant socioeconomic effects. The Inspectorate is therefore not content to scope this matter out. The ES should provide a standalone socioeconomics assessment. This assessment should be based on relevant guidance such as Suffolk County Councils supplementary guidance document: 'The Socio-economic effects of NSIPs'. The Applicant's attention is drawn to the consultation response from Suffolk County Council for further information on this matter (Appendix 2 of this opinion)

ID	Ref	Description	Inspectorate's comments
3.10.2	N/A	N/A	N/A

3.11 Human Health

(Scoping Report Section 5.12)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.11.1	Section 5.12	Human Health – All Phases	The Inspectorate agrees that a standalone aspect chapter on human health is not required on the basis that the Proposed Development will be designed to minimise any impact on human health and where there are interactions with human health these will be assessed within the Noise, Climate Change and Transport aspect chapters of the ES. Impacts to human health may extend beyond the Traffic and Access, Climate Change and Noise Chapters and the ES should clearly set out potential impacts to human health from the Proposed Development during construction, operation and decommissioning and cross-reference where impacts are assessed within the ES e.g. Landscape and Visual, Air Quality, Water Environment etc.

ID	Ref	Description	Inspectorate's comments
3.11.2	N/A	N/A	N/A

3.12 Arboriculture

(Scoping Report Section 5.13)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.12.1	Section 5.13	Arboriculture – All Phases	A standalone assessment of arboriculture impacts is proposed to be scoped out of the ES on the basis that the removal of hedgerows and trees will be avoided as far as is reasonably practicable, targeted arboricultural surveys will inform vegetation removal where necessary and there will be embedded measures to protect the retained vegetation. The Inspectorate agrees that due to the nature of the site and the inclusion of these measures, a standalone arboriculture assessment is not required. This matter can be scoped out of the ES.

ID	Ref	Description	Inspectorate's comments
3.12.2	5.13.3	Arboricultural surveys	The Scoping Report states that subject to final design, there may be some need for vegetation removal, to be informed by targeted arboricultural surveys. It is the Inspectorates opinion that arboricultural surveys should be used to inform relevant assessments within the ES, such as the Landscape and Visual assessment, and not be left to the detailed design phase.

3.13 Ground conditions

(Scoping Report Section 5.14)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.13.1	Section 5.14	Ground Conditions – All Phases	The Scoping Report proposes to scope out ground conditions from the ES on the basis that the potential for land contamination on the site is generally very low, further targeted intrusive ground investigations are proposed and good practice measures relating to ground conditions are to be included within the oCEMP. The Inspectorate notes that historic ground workings are not considered within the Scoping Report. Historic ground workings may lead to a risk of ground water contamination on site. Furthermore, the Phase 1 Ground Condition Assessment states that data is only available for a small proportion of the site, leaving an unknown risk for the majority of the site. As such, the Inspectorate considers that there is insufficient information to rule out significant effects. The ES should provide a standalone assessment of ground conditions across all phases of the Proposed Development. The Applicant's attention is drawn to the consultation response from the EA (Appendix 2 of this opinion) for further information.

ID	Ref	Description	Inspectorate's comments
3.13.2	N/A	N/A	N/A

3.14 Landscape and Visual

(Scoping Report Chapter 7)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.14.1	Table 7.3	Impacts to the Broads National Park and it's setting – All Phases	Impacts to the Broads National Park are proposed to be scoped out on the basis that it lies approximately 3.8km to the south-east of the Site at its closest point and the Zone of Theoretical Visibility (ZTV) shows that there is no intervisibility between the national park and the Proposed Development and the Proposed Development site is thought to be outside of its setting. On this basis, the Inspectorate agrees that significant effects are unlikely to occur on the National Park. As such, this matter can be scoped out of the ES.
3.14.2	Table 7.3	Impacts to Conservation Areas: Pulham Market; Shotesham; Seething; Hedenham; Howe. - All Phases	The Scoping Report proposes to scope this matter out on the basis that indirect effects on these conservation areas are not considered to be significant. The Inspectorate notes that the ZTV indicates intervisibility between the Proposed Development and some of these conservation areas. Furthermore, little justification has been provided to suggest why impacts on these Conservation areas would not be significant. As such, the Inspectorate is not in a position to scope this matter out. The ES should assess any potential impact to these conservation areas.
3.14.3	Table 7.3	Impacts to Registered Parks and Gardens (RPG) – All Phases	The Scoping Report proposes to scope this matter out as the only RPG within the study area is outside of any area of visibility according to the ZTV. On this basis, the Inspectorate agrees that impacts to RPGs can be scoped out of the ES subject to confirmation in the final ZTV.

3.14.4	Table 7.3	Impacts to National Cycle Routes (NCRs) – All Phases	Impacts to NCRs are proposed to be scoped out on the basis that there are no NCRs within the site or study area. On this basis, the Inspectorate agrees that this matter can be scoped out of the ES.
3.14.5	Table 7.3	Impacts to People's Views and Visual Amenity beyond the Study Area – All Phases	The Scoping Report states that effects on visual receptors beyond 2km are expected to be negligible given expected visibility. However, the Zone of Theoretical Visibility (ZTV) illustrated in Figures 7.1.1 to 7.1.12 show that the panels will be visible beyond 2km. The ES should assess potential effects on views and visual amenity within the ZTV where significant effects are likely to occur.
3.14.6	Table 7.3	Impacts to Night-time views and perception of the night sky – All Phases	Night-time lighting effects from a landscape and visual perspective are proposed to be scoped out of the assessment for the construction, operational and decommissioning phases as the site and 2km study area do not lie within a designated 'dark sky area', and given the nature of the Proposed Development, permanent lighting during operation would not be required, being limited to emergency and motion activated security lighting. Lighting effects during construction and decommissioning are expected to be limited in extent, intensity and duration. The Inspectorate does not consider that sufficient information has been provided to scope out an assessment of night-time lighting and the ES should assess the lighting effects on landscape and visual receptors, as well as ecological receptors such as bats, or demonstrate that no likely significant effects will occur. The ES should include a detailed description of the lighting design and measures taken to avoid or minimise lighting impacts on ecological receptors. This should also include consideration of effects relating to intermittent lighting sources such as motion activated security lighting.

ID	Ref	Description	Inspectorate's comments
3.14.7	Section 7.2	Study Area	The Scoping Report states that, based on the Zone of Theoretical Visibility (ZTV) and professional judgment, likely significant effects are unlikely to occur beyond 2km from the Proposed Development boundary. The ES should provide further justification for the extent of the study area with reference to recognised professional guidance and the extent of the likely impacts, informed by fieldwork and relevant models or approaches. Effort should be made to agree the study areas with relevant consultation bodies.

3.15 Ecology and Biodiversity

(Scoping Report Section Chapter 8)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.15.1	Table 8.6 and Para 8.9.2 – 8.9.5	Impacts to: • Norfolk Valley Fens Special Area of conservation (SAC) • The Broads SAC • Broadland Ramsar	The Scoping Report proposes to scope this matter out on the basis that due to the static nature of the sites' qualifying habitats interests, spatial separation and/or absence of hydrological pathways of connectivity, embedded mitigation and good practice would be sufficient to prevent any impacts from occurring. The Inspectorate notes that it is not yet clear whether the Proposed Development site will have a hydrological linkage to any of these sites. Considering the presence of waterways within the Proposed Development site, the Inspectorate considers that there is insufficient information to determine the potential for hydrological connectivity. As such, the Inspectorate is not in a position to scope this matter out at this stage. The ES should provide an assessment of this matter or provide a statement with robust justification as to why significant effects are unlikely to occur. This justification should include reference to the results of any relevant studies or surveys and show evidence of agreement with the relevant stakeholders.
3.15.2	Table 8.6 and Para 8.9.2 – 8.9.5	Impacts to Broadland Special Protection area (SPA)	The Scoping Report proposes to scope this matter out on the basis that due to the intervening distance, undulating topography and nature of the habitat on site, it is considered unlikely that the mobile qualifying features would utilise the site or surrounding area. On this basis, the Inspectorate is content to scope this matter out of the ES.
3.15.3	Table 8.2 and Table 8.6	Sites of Special Scientific Interest (SSSI)	The Scoping Report identifies a number of SSSI in proximity to the Proposed Development, however it is not clear whether any of these are proposed to be scoped out. For the avoidance of doubt, the ES should include consideration of the following SSSIs: • Pulham Market Big Wood SSSI • Aslacton Parish Land SSSI

			• Forncett Meadows SSSI • Fritton Common SSSI • Shotesham-Woodton Hornbeam Woods SSSI • Sexton Wood SSSI • Flordon Common SSSI • Shotesham Common SSSI • Hedenham Wood SSSI • Tindall Wood • Ditchingham SSSI The Applicant's attention is drawn to the consultation response from Natural England (NE) (Appendix 2 of this opinion) for further information.
3.15.4	Table 8.6	Non-Statutory Designated Sites and Ancient Woodlands greater than 1km from the Sites and CRC. – All Phases	The Scoping Report proposes to scope these matters out on the basis that there would be no clear impact pathways at this distance and no hydrological connections exist between the Proposed Development and these sites. The Inspectorate considers that insufficient information has been provided to support the claim that there are no impact pathways to these sites. As such, the Inspectorate is not in a position to scope this matter out. The ES should assess any potentially significant impacts on these sites. The Applicant's attention is drawn to the consultation response from NE for further information (Appendix 2 of this opinion).
3.15.5	Table 8.6	Impacts to Priority Habitats (or other habitats of biodiversity importance) greater than 250m of the Sites and CRC boundaries. – All Phases	The Scoping Report proposes to scope these matters out on the basis that there would be no clear impact pathways at this distance and no hydrological connections exist between the Proposed Development and these habitats. On this basis, the Inspectorate agrees that significant effects on priority habitats further than 250m from the Proposed Development are not likely to occur. This matter can be scoped out from the ES.

3.15.6	Table 8.6 and Para 8.9.6	Common and widespread habitats of low sensitivity and/or conservation interest Within the Sites and CRC.- All Phases	The Scoping Report proposes to scope this matter out on the basis that these habitats are of low sensitivity, have limited ecological value and potential impacts can be mitigated through embedded design measures and biodiversity enhancements. Whilst the Inspectorate agrees that these habitats have limited ecological value, it is of the opinion that the amount of affected habitat may have significant implications. As such, the Inspectorate is not in a position to scope this matter out. The ES should assess any potentially significant effects as a result of impacts to this habitat.
3.15.7	Table 8.6	Impacts to Invertebrates Within the site and CRC - Operation	The Scoping Report proposes to scope this matter out on the basis that habitat in the Proposed Development site generally has a negligible value for invertebrate populations and will likely result in improvements to invertebrate habitat through a commitment to BNG enhancements, cessation of insecticide use and the provision of precautionary avoidance measures provided within the OEMP. On this basis, the Inspectorate agrees that significant impacts to Invertebrate populations are unlikely to occur during the operation of the Proposed Development. This matter can be scoped out of the ES.
3.15.8	Table 8.6	Impacts to Great Crested Newt (GCN) Within the site, CRC and within 250m - Operation	The Scoping Report proposes to scope this matter out on the basis that the operational phase is not likely to impact upon GCN populations and will likely result in improvements to habitat through a commitment to BNG enhancements and the provision of precautionary avoidance measures provided within the OEMP. On this basis, the Inspectorate agrees that significant impacts to GCN populations are unlikely to occur during the operational phase. This matter can be scoped out of the ES.
3.15.9	Table 8.6	Impacts to Breeding Birds within the site - Operation	These matters are proposed to be scoped out on the basis that activities associated with the operational phase such as maintenance and the occasional replacement of a PV panel are unlikely to result in significant impacts on breeding birds. On this basis, the Inspectorate agrees that, assuming any habitat loss or changes in ability to access land are assessed as part of the construction assessment, the operational phase is unlikely to result in significant effects on these species. These matters can be scoped out from the ES.
3.15.10	Table 8.6	Impacts to:	The Scoping Report proposes to scope out an assessment of these species on the basis that the habitat on site is considered to be of negligible value for amphibians and reptiles,

		• Widespread Amphibians • Reptiles • Dormouse • Other mammals Within the site and CRC – All Phases	outside the range of dormice and precautionary avoidance measures and enhancements would be sufficient to avoid impacts and create opportunities for these species. On this basis, and subject to the agreement of relevant consultees, the Inspectorate agrees that significant effects are unlikely to occur on these species. This matter can be scoped out from the ES.
3.15.11	Table 8.6	Impacts to Breeding birds (within the CRC only) – All Phases	This matter is proposed to be scoped out on the basis that impacts during construction are considered to be non-significant and below ground infrastructure is to be left in-situ during decommissioning. The Inspectorate agrees that significant impacts are unlikely to occur during operation and as such impacts during this phase can be scoped out of the ES. However, the Inspectorate notes the potential presence of red list species such as skylark within the CRC, which utilise open cropland for breeding habitats. As such, the Inspectorate considers that there is the potential for significant impacts to breeding birds within the CRC during the construction phase. As such the Inspectorate is not able to scope this matter out. The ES should contain an assessment of the construction impacts on breeding birds within the CRC.
3.15.12	Table 8.6	Impacts on Wintering/Passage Birds – All Phases	The Scoping Report proposes to scope this matter out on the basis that it is unlikely that mobile qualifying species associated with the SPA/Ramsar would regularly utilise the habitats within and surrounding the site for foraging purposes and habitat retention and enhancement associated with the Proposed Development would result in an overall benefit to wintering/passage birds. On this basis, the Inspectorate is content to scope this matter out of the ES.
3.15.13	Table 8.6	Impacts on Water vole and otter – All Phases	The Scoping Report proposes to scope this matter out on the basis that embedded measures such as water course and ditch buffers will be utilised to avoid impacts during construction and decommissioning, the cessation of agricultural chemicals and implementation of biodiversity enhancements will result in benefits during operation and targeted surveys will be undertaken if impacts within the surrounding watercourses cannot be avoided. The Inspectorate considers that this approach does not cover all the potential

			risks to this species as they are mobile and can range beyond the proposed buffer zones. As such, the Inspectorate is currently not in a position to scope this matter out. The ES should either provide an assessment of the impact on these species, or provide a statement, supported by the results of Water Vole and Otter surveys, confirming their absence from the site.
3.15.14	Table 8.6	Invasive Species Within the Sites and CRC. – All Phases	This matter is proposed to be scoped out on the basis that whilst invasive species such as Japanese Knotweed and Giant Hogweed are present on site, they are not considered to be a significant environmental constraint, and the Applicant has committed to adhere to legislative compliance as standard. The Inspectorate notes that this is not reflected in the Table of Commitments. Furthermore, this justification does not consider the potential of introducing new INNS to the site which were not previously there. As such, the Inspectorate considers that there is insufficient information to scope this matter out. The ES should assess all potential risks from the spread of Invasive species within the site.
3.15.15	Table 8.6	Air Quality Impacts upon sensitive ecological receptors (statutory and non-statutory designated sites, ancient woodland sites, and priority habitats) – All Phases	The Inspectorate agrees that with the implementation of standard construction management processes, significant effects on air quality during construction operation and decommissioning are unlikely. This matter can be scoped out of the ES.
3.15.16	Table 8.6	Lighting Impacts upon sensitive ecological receptors (statutory and non-statutory designated sites, ancient woodland sites, priority habitats, roosting and foraging bats) – All Phases	See comment I.D. 3.14.6 for the Inspectorates opinion on this matter.
3.15.17	N/A	Impacts to fish from EMF	It is noted that the Scoping Report does not consider the risk of EMF emissions to fish populations. The Inspectorate understands that the Hempnall Beck tributary contains a

			number of protected fish species. The ES should contain an assessment of the impact from EMF on fish or provide evidence that the depth the 400kv cables will be buried at the Hempnall Beck tributary is enough to avoid magnetic fields at levels detectable to fish. The Applicant's attention is drawn to the consultation response from the Environment Agency (EA) (Appendix 2 of this opinion).
3.15.18	N/A	Impacts to Aquatic Invertebrates	It is noted that the Scoping Report does not consider the potential impact to aquatic invertebrates. It is the Inspectorates opinion that this matter should be scoped into the ES. The Applicant's attention is drawn to the consultation response from the EA for further information (Appendix 2 of this opinion).

ID	Ref	Description	Inspectorate's comments
3.15.19	N/A	Buffer zones	For the avoidance of doubt buffer and root protection zones from ancient woodlands and ancient or veteran trees should be at least 15m from the boundary of the woodland or 15 times larger than the diameter of the tree. For further information on the mitigation of effects on ancient woodlands and trees, the Applicant's attention is drawn to the consultation response from Forestry England (Appendix 2 of this opinion)
3.15.20	N/A	Priority habitat	It is noted that the River Tas is within the Red Line Boundary (RLB). The River Tas is a chalk stream priority habitat with a current ecological status of poor. For the avoidance of doubt, the River Tas should be fully considered within the ES.
3.15.21	N/A	White Clawed Crayfish	EA records show the presence of White clawed crayfish on the River Tas, however this species is not considered within the Scoping Report. The Applicant should commit to survey for crayfish at relevant locations when works affecting watercourses are known. The Applicant's attention is drawn to the consultation response from the EA for further information (Appendix 2 of this opinion)
3.15.22	Section 8.5	Baseline information	It is noted that fish species have not been included within the scope of the desk study despite the fact that the CRC is proposed to cross a main river. The desk study for the ES

			should be informed by EA fish population data. The Applicant's attention is drawn to the consultation response from the EA for further information (Appendix 2 of this opinion)
3.15.23	Section 8.7	Mitigation	The ES should provide a description of any additional measures that are required to avoid significant effects. Effort should be made to agree any mitigation measures with the relevant stakeholders.

3.16 Cultural Heritage

(Scoping Report Chapter 9)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.16.1	Para 9.6.5	Direct Impacts to designated heritage assets – All Phases	This matter is proposed to be scoped out on the basis that there are no designated heritage assets within the Proposed Development boundary. On this basis, the Inspectorate agrees that direct significant impacts on heritage assets are unlikely to occur. This matter can be scoped out of the ES.
3.16.2	Table 9.15	Direct impacts to below ground archaeology - Decommissioning	This matter is proposed to be scoped out on the basis that there would be no further likely significant effects that would arise from the decommissioning phase than from the construction phase and measures outlined in the outline Decommissioning Environmental Management Plan (oDEMP) will be sufficient to mitigate and potential impacts. Considering below ground infrastructure is proposed to be left in situ and the commitment to best practice measures within the oDEMP, the Inspectorate agrees that significant effects are unlikely to occur on buried archaeology during decommissioning. This matter can therefore be scoped out of the ES.
3.16.3	Table 9.15	Indirect impacts to designated and non-designated heritage assets (Solar Panels, BESS and Substation areas) - Decommissioning	This matter is proposed to be scoped out on the basis that whilst there would be indirect impacts to heritage receptors during decommissioning, they would be lower in magnitude than during construction and therefore considered not significant. Whilst the Inspectorate agrees that the impacts from Decommissioning would be of a lower magnitude than construction, insufficient information has been provided on Decommissioning activities to suggest that they would not be significant. As such the Inspectorate is not in a position to scope this matter out. The ES should assess indirect decommissioning impacts on designated and non-designated heritage assets.
3.16.4	Table 9.15 and	Indirect impacts to designated and non-designated heritage	The Scoping Report proposes to scope this matter out on the basis that, as the cable infrastructure is to be buried, there will be no post-construction impacts on setting and construction impacts are short term and not much bigger in magnitude than the current

	Para 9.7.3	assets (CRC) – All Phases	agricultural use. On this basis, the Inspectorate agrees that significant indirect impacts as a result of the construction, operation and decommissioning of the cable route corridor are unlikely to occur. This matter can be scoped out of the ES.

ID	Ref	Description	Inspectorate's comments
3.16.5	Para 9.2.3	Temporary construction compounds	Currently, the locations of temporary construction areas are unknown, meaning that the baseline is currently incomplete. The ES should identify any potential receptors and impact pathways from these temporary elements and undertake an assessment where significant effects are likely to occur.
3.16.6	Section 9.2	Study areas	The ES should contain a robust justification to support the study areas and sensitive receptors selected for the purposes of the ES assessment, on the basis of recognised professional guidance and the extent of the likely impacts, with reference to relevant approaches such as the ZTV developed for the Landscape and Visual Impact Assessment (LVIA). It should be clear how the approach taken ensures that any heritage assets or conservation areas with long views towards or out from the application site have been identified and considered. Effort should be made to agree the approach and sensitive receptors with relevant consultation bodies. The study areas and locations of the heritage assets should be depicted on supporting plan/s.

3.17 Transport and Access

(Scoping Report Chapter 10)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.17.1	Paragraphs 10.7.1 to 10.7.3	Operational traffic effects	The Scoping Report advises that the number of trips generated for the operation of the Proposed Development is expected to be negligible or neutral. The Inspectorate agrees to scope this matter out subject to the provision of information regarding the type of maintenance visits and vehicles required, and confirmation that these would not exceed relevant thresholds of effect (e.g. as set out in IEMA Guidelines: Environmental Assessment of Traffic and Movement 2023). This should also take into account any cumulative traffic effects.

ID	Ref	Description	Inspectorate's comments
3.17.2	Section 10.2	Study area	An indicative study area is shown in Figure 10.1 (Volume II) of the Scoping Report. The ES should justify how the study area has been identified for assessment with reference to relevant industry guidance, sensitive receptors, and agreement with the relevant highway authorities. A plan illustrating the extent of the study area, the expected route(s) of construction traffic, and anticipated numbers of vehicle movements (including vehicle type, peak hour and daily movements) should be included in the ES.
3.17.3	Paragraphs 10.6.18 to 10.6.20	Abnormal Indivisible Load (AIL)	The Scoping Report states that there will be AILs for the proposed development, such as transportation of transformers. The Scoping Report proposes an AIL report will be prepared and included within the ES as part of the DCO application. The impacts on safety from the delivery of AILs should be assessed within the ES where significant effects are likely to arise. Appropriate measures to ensure safe transportation should be included within the AIL report.

			The Applicant's attention is drawn to the comments from National Highways (Appendix 2 of this Opinion).

3.18 Noise and Vibration

(Scoping Report Chapter 11)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.18.1	Paragraphs 11.7.11 and 11.7.17	Noise and vibration effects on sensitive ecological receptors during construction and decommissioning phases	The Scoping Report states that the potential effects of noise levels associated with construction and decommissioning activities on sensitive ecological receptors is addressed in Chapter 8: Ecology and Biodiversity of the Scoping Report. The Inspectorate is content with this approach. The ES should provide clear cross-referencing in the Noise and Vibration ES aspect chapter to where these assessments are located.
3.18.2	Paragraph 11.7.24	Noise effects on sensitive ecological receptors during operation	The Scoping Report proposes to scope this matter out on the basis that the magnitude of operational noise levels are unlikely to affect ecological receptors. On this basis, the Inspectorate is content that this matter can be scoped out of further assessment. However, the ES description of development should confirm the operational equipment types and numbers (with reference to distance from noise sources to the sensitive ecological receptors) to justify this position.
3.18.3	Paragraphs 11.8.1 to 11.8.3 and Table 11.11	Vibration from traffic at all phases	The Scoping Report proposes to scope this matter out. Paragraph 11.8.2 of the Scoping Report states that "if road surfaces do not contain irregularities, then vibration effects should not result at receptors". The condition of the road has not been assessed and the vehicle routes and site access have not been confirmed within this chapter to justify why vibration from traffic at all phases should be scoped out. The ES should provide evidence to confirm that ground-borne vibration generated from HGV movements (including along access routes) during construction, operation and decommissioning would not result in significant effects on sensitive receptors or include an assessment of the LSE, unless otherwise agreed with relevant consultation bodies.
3.18.4	Paragraphs 11.8.4 to	Vibration from operational equipment	The Scoping Report proposes to scope this matter out on the basis that operational equipment would generate insignificant levels of vibration at vibration sensitive

	11.8.6 and Table 11.11		receptors. On this basis, the Inspectorate is content that this matter can be scoped out of further assessment. However, the ES description of development should confirm the operational equipment types and numbers (with reference to distance from noise sources to the sensitive receptors) to justify this position.
3.18.5	Paragraph 11.8.7 and Table 11.11	Operational noise and vibration from panels	The Scoping Report proposes to scope this matter out on the basis that operational noise and vibration effects from solar panels are anticipated insignificant. On this basis, the Inspectorate is content that this matter can be scoped out of further assessment.
3.18.6	Paragraphs 11.8.8 to 11.8.9 and Table 11.11	Operational noise and vibration from cable route corridor	The Scoping Report proposes to scope this matter out on the basis that operational noise and vibration from cable being underground are not expected to be perceptible from the cable routes. On this basis, the Inspectorate is content that this matter can be scoped out of further assessment.
3.18.7	Paragraph 11.8.10 and Table 11.11	Decommissioning noise	The Scoping Report proposes to scope out an assessment of decommissioning phase noise effects as these are likely to be similar or less significant than effects during construction. Limited information is provided regarding the activities proposed for the decommissioning phase. In the absence of information such as evidence demonstrating that decommissioning activities would not result in noise effects greater than construction or clear agreement with relevant statutory bodies, the Inspectorate is not in a position to scope these matters from the assessment. Accordingly, the ES should include an assessment of these matters or provide information demonstrating agreement with the relevant consultation bodies and the absence of LSE.
3.18.8	Paragraph 11.8.11 and Table 11.11	Decommissioning vibration	The Scoping Report proposes to scope this matter out on the basis that piling is not anticipated to be required during decommissioning. On this basis, the Inspectorate is content that this matter can be scoped out of further assessment.

ID	Ref	Description	Inspectorate's comments

3.18.9	Section 11.4 and Figure 11.1	Baseline condition - sensitive receptors and noise survey locations	The Inspectorate notes that the figure showing proposed noise survey locations and the tables of identified noise and vibration sensitive receptors does not currently include the CRC. The Applicant must ensure that the noise monitoring provides adequate coverage across the entire area within the ZOI of the proposed development. As noted above, the ES should report on the predicted effects at all noise and vibration sensitive receptors within the project's ZOI. The Applicant is advised to seek to agree the noise survey locations with relevant consultation bodies.

3.19 Climate Change

(Scoping Report Chapter 12)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.19.1	Paragraphs 12.8.3 and 12.8.4 and Table 12.3	Greenhouse Gases (GHG) emissions during decommissioning	The Scoping Report proposes to scope out an assessment of the GHG emissions during decommissioning phase on the basis that the emissions in terms of vehicle fuel use are anticipated to be similar to that identified at the construction stage and the future uncertainties. In the absence of further detail, the Inspectorate cannot agree to scope this matter out at this time. The Inspectorate would expect potential GHG emissions during decommissioning to be characterised within the ES and an assessment of impacts provided where there is the potential for likely significant effects to occur.
3.19.2	Paragraphs 12.8.5 to 12.8.12 and Table 12.3	Climate Change Risk Assessment (CCRA) at all phases	The Scoping Report proposes to scope out an assessment of CCRA at all phases on the basis that the risk of climate hazards will be managed through CEMP during construction phase and mitigation will be provided through embedded infrastructure design and application of general health and safety practices. The Inspectorate notes that the potential effect of flooding will be assessed within the Flood Risk Assessment to be submitted with the application. The Inspectorate is content with this approach. However, the ES should explain how the proposed development has been designed to be resilient to climate change risks. The Applicant's attention is drawn to the comments from the Natural England (Appendix 2 of this Opinion) regarding how the Proposed Development may exacerbate climate change impacts to the natural environment.
3.19.3	Paragraph 12.8.13 and Table 12.3	In-combination effects	The Scoping Report proposes to scope out an in-combination climate change impact assessment from the climate chapter of the ES on the basis that climate change impacts relevant to the proposed development will be assessed through the other relevant topics of the ES. Given that climate change impacts relevant to the proposed development will be assessed through the other relevant topics of the ES, the Inspectorate agrees to scope out an in-combination climate change impact assessment

			from the climate change chapter. The climate change chapter should signpost where in the ES the relevant climate change factors have been assessed.
3.19.4	Paragraphs 12.8.14 and 12.8.15	Cumulative effects	The Inspectorate does not agree to scope this matter out. The ES should consider how other developments cumulatively may affect the vulnerability of the proposed development to climate change eg any changes in flood flows, and cumulative GHG emissions/ savings. The Applicant should seek to agree the approach to the climate change cumulative effects assessment with relevant consultation bodies.

ID	Ref	Description	Inspectorate's comments
3.19.5	N/A	N/A	N/A

3.20 Soils and Agricultural Land

(Scoping Report Chapter 13)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.20.1	Paragraphs 13.7.11 and 13.8.1 and Table 13.4	Effect on farm businesses during construction and decommissioning	The Scoping Report proposes to scope out this matter on the basis that effects on farm business are short term in nature and likely significant effects will be assessed during operational phase. The Inspectorate does not agree to scope this matter out as the estimated construction period would last for 24 months and decommissioning period is expected to take 12-24 months. The ES should identify the agricultural land uses that will be displaced by the proposed development during construction and decommissioning. Potential effects on farm businesses, loss of agricultural production and implications for food security from both the PV solar site and grid connection should be considered where there is potential for significant effects to occur.
3.20.2	Paragraph 13.8.2 and Table 13.4	Panel and battery replacement during operational phase	Paragraph 13.8.2 of the Scoping Report proposes to scope this matter out on the basis that only localised and low magnitude impacts are expected. However, in Table 13.4 states that the effects on soils from panel replacement will be scoped in and covered in the Outline Soil Management Plan (OSMP). The Inspectorate is content that this matter can be scoped out of further assessment on the basis that significant effects on soil and agricultural are unlikely as a result of panel and battery replacement during operational phase. For the avoidance of doubt, the applicant should ensure that the ES provides consistent information throughout.

ID	Ref	Description	Inspectorate's comments
3.20.3	Paragraphs 13.4.8,	Agricultural Land Classification (ALC) surveys	The Scoping Report states that the ALC field surveys are currently being carried out across the sites but excluding the Cable Route Corridor (CRC). The survey of the CRC is proposed to take place as part of a Soil Resources Management Plan (SRMP) post DCO. The Inspectorate expects that an ALC for the whole site, including the CRC, will

	13.4.9 and 13.9.2		be undertaken to support the ES unless there is substantial justification dictating otherwise. The ES should contain a clear tabulation of the areas of land in each Best and Most Versatile (BMV) classification to be temporarily or permanently lost as a result of the proposed development, with reference to accompanying map(s) depicting the grades. Specific justification for the use of the land by grade should be provided. Consideration should be given to the use of BMV land in the Applicant's discussion of alternatives.

3.21 Cumulative and in-Combination Effects

(Scoping Report Chapter 14)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.21.1	N/A	N/A	No matters are proposed to be scoped out.

ID	Ref	Description	Inspectorate's comments
3.21.2	Table 14.2	Cumulative schemes	For the avoidance of doubt, the Applicant should seek to agree its list of cumulative schemes with the relevant Local Planning Authorities (LPAs).
3.21.3	Table 14.2	Location of cumulative developments	Table 14.2 sets out the current schemes considered cumulatively with the Proposed Development. This provides a description, location and distance to the Proposed Development. The ES should include a figure depicting the locations and extent of cumulative developments in relation to the Proposed Development.

APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED

TABLE A1: PRESCRIBED CONSULTATION BODIES

Bodies prescribed in schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended) (the 'APFP Regulations (as amended)')

SCHEDULE 1 DESCRIPTION	ORGANISATION
The relevant parish council(s) or, where the application relates to land [in] Wales or Scotland, the relevant community council	Dickleburgh and Rushall Parish Council
	Burston and Shimpling Parish Council
	Pulham Market Parish Council
	Forncett Parish Council
	Aslacton Parish Council
	Tharston and Hapton Parish Council
	Hempnall Parish Council
	Redenhall with Harleston Town Council
	Alburgh Parish Council
	Woodton Parish Council
	Shotesham Parish Council
	Brooke Parish Council
	Seething Parish Council
	Mundham Parish Council
	Bergh Apton Parish Council
	Tivetshall Parish Council
	Gissing Parish Council
	Great Moulton Parish Council

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Wacton Parish Council
	Pulham St Mary Parish Council
	Starston Parish Council
	Shelton and Hardwick Parish Council
	Long Stratton Town Council
	Morningthorpe (and Fritton) Parish Council
	Flordon Parish Council
	Tasburgh Parish Council
	Saxlingham Nethergate Parish Council
	Newton Flotman Parish Council
	Stoke Holy Cross Parish Council
	Denton Parish Council
	Earsham Parish Council
	Topcroft Parish Council
	Ditchingham Parish Council
	Poringland Parish Council
	Alpington with Yelverton Parish Council
	Swainsthorpe Parish Council
The Environment Agency	Environment Agency
Natural England	Natural England
The Forestry Commission	Forestry Commission - East and East Midlands
The Historic Buildings and Monuments Commission for England (known as Historic England)	Historic England

SCHEDULE 1 DESCRIPTION	ORGANISATION
The relevant internal drainage board	Broads Internal Drainage Board
	Norfolk Rivers Internal Drainage Board
	Waveney Lower Yare and Lothingland Internal Drainage Board
The relevant Highways Authority	Norfolk County Council Highways Department
	National Highways
The Civil Aviation Authority	Civil Aviation Authority
The Health and Safety Executive	Health and Safety Executive
United Kingdom Health Security Agency, an executive agency of the Department of Health and Social Care	United Kingdom Health Security Agency
NHS England	NHS England
The Crown Estate Commissioners	The Crown Estate
The relevant police authority	Office of the Police and Crime Commissioner for Norfolk
The relevant ambulance service	East of England Ambulance Service NHS Trust
The relevant fire and rescue authority	Norfolk Fire and Rescue Service

TABLE A2: RELEVANT STATUTORY UNDERTAKERS

'Statutory undertaker' is defined in The APFP Regulations (as amended) as having the same meaning as in section 127 of the Planning Act 2008 (PA2008)

STATUTORY UNDERTAKER	ORGANISATION
The relevant Integrated Care Board	NHS Norfolk and Waveney Integrated Care Board
NHS England	NHS England
The relevant NHS Trust	East of England Ambulance Service NHS Trust
Railways	Network Rail Infrastructure Ltd
	National Highways Historical Railways Estate
Civil Aviation Authority	Civil Aviation Authority
Licence Holder (Chapter 1 Of Part 1 Of Transport Act 2000)	NATS En-Route Safeguarding
Universal Service Provider	Royal Mail Group
Homes and Communities Agency	Homes England
The relevant Environment Agency	Environment Agency
The relevant water and sewage undertaker	Anglian Water
The relevant public gas transporter	Cadent Gas Limited
	Northern Gas Networks Limited
	Scotland Gas Networks Plc
	Southern Gas Networks Plc
	CNG Services Ltd
	Energy Assets Pipelines Limited
	ES Pipelines Ltd

STATUTORY UNDERTAKER	ORGANISATION
	ESP Connections Ltd
	ESP Networks Ltd
	ESP Pipelines Ltd
	Fulcrum Pipelines Limited
	GTC Pipelines Limited
	Harlaxton Gas Networks Limited
	Independent Pipelines Limited
	Indigo Pipelines Limited
	Inovyn Enterprises Ltd
	Last Mile Gas Ltd
	Leep Gas Networks Limited
	Mua Gas Limited
	Quadrant Pipelines Limited
	Stark Works
	National Gas
The relevant electricity distributor with CPO Powers	Advanced Electricity Networks Ltd
	Aidien Ltd
	Aurora Utilities Ltd
	Eclipse Power Network Limited
	Energy Assets Networks Limited
	ESP Electricity Limited
	Fulcrum Electricity Assets Limited
	Green Generation Energy Networks Cymru Ltd
	Harlaxton Energy Networks Limited

STATUTORY UNDERTAKER	ORGANISATION
	Independent Distribution Connection Specialists Ltd
	Independent Power Networks Limited
	Indigo Power Limited
	Last Mile Electricity Ltd
	Leep Electricity Networks Limited
	Mua Electricity Limited
	Optimal Power Networks Limited
	Stark Infra-Electricity Ltd
	The Electricity Network Company Limited
	UK Power Distribution Limited
	Utility Assets Limited
	Vattenfall Networks Limited
	UK Power Networks Limited
The relevant electricity transmitter with CPO Powers	National Grid Electricity Transmission Plc
	National Grid Electricity System Operation Limited

TABLE A3: LOCAL AUTHORITIES AS DEFINED IN SECTION 43(3) OF THE PA2008

LOCAL AUTHORITY
Great Yarmouth Borough Council
Norwich City Council
East Suffolk Council
Broadland District Council
South Norfolk District Council
Breckland District Council

LOCAL AUTHORITY
Mid Suffolk District Council
Broads Authority
Broads Authority
Suffolk County Council
Cambridgeshire County Council
Norfolk County Council
Lincolnshire County Council

APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES

CONSULTATION BODIES WHO REPLIED BY THE STATUTORY DEADLINE:
Alburgh Parish Council
Alpington with Yelverton Parish Council
Anglian Water
Aslacton Parish Council
Bergh Apton Parish Council
Brooke Parish Council
Cadent Gas
Cambridgeshire County Council
East Suffolk Council
Environment Agency
Forestry Commission
Great Moulton Parish Council
Health and Safety Executive
Hempnall Parish Council
Indigo Networks
Morningthorpe and Fritton Parish Council
National Gas Transmission
National Highways
NATS Safeguarding
Natural England
Norfolk County Council
Seething Parish Council

Shelton and Harwick Parish Council
Shotesham Parish Council
South Norfolk Council
Suffolk County Council and Mid Suffolk District Council
Tasburgh Parish Council
Tivetshall Parish Council
UK Health Security Agency
Wacton Parish Council
Woodton Parish Council

Alburgh Parish Council consultation response to East Pye Solar.

The Proposed scope of the East Pye Solar EIA

The topics East Pye Solar propose to scope into the assessment are:

- Cultural Heritage
- Landscape & Visual
- Ecology & Biodiversity
- Transport & Access
- Noise
- Climate Change
- Soils and Agricultural Land

In their document they have requested to scope out the following categories:

- Air Quality
- Water Environment
- Major Accidents and Disasters
- Electric, Magnetic and Electromagnetic Fields
- Telecommunications, Television Reception and Utilities
- Wind Microclimate
- Daylight, Sunlight and Overshadowing
- Glint and Glare
- Lighting
- Minerals
- Waste and Materials
- Socio-Economics
- Human Health
- Arboriculture; and
- Ground Conditions

Alburgh Parish Council feel it is important that these categories are included in the Environmental Impact Assessment so that due diligence can been completed by the planning inspectorate.

East Pye Solar also propose to remove various subsections of categories from the scope that would be otherwise included in the Environmental Impact Statement.

Alburgh Parish Council would like to see included:

- *Justification on how this is considered to be one NSIP project as it stretches across 10 sites and 14 separate Parishes.*

- *Justification how this project meets the government's Net Zero 2030 and 2035 targets for the East of England when other schemes are better placed both in location and timing.*
- *Impact on the Broads National Park should be scoped in as one site lies 2 miles from the Broads National Park, within the the 3 mile boundary where consultation is needed.*
- *Cumulative impact should be scoped in across all aspects of the EIS. There are already multiple solar projects either in operation, or consented for construction in South Norfolk, as well as another three with grid connections agreed in the same area*.
- **Error! Bookmark not defined.***Climate change adaptation should be scoped in as well as the overall carbon footprint of the project.*
- *Major Accidents and Disasters should be scoped in due to the battery storage proposed and the issues around fire. The environmental impacts of such a disaster to local residents and wildlife, as well as soils and rivers should be scoped in.*
- *Air quality and associated risks to human health should be scoped in.*
- *Telecommunications, Television Reception and Utilities should be scoped in, and also included within Major Accidents and Disasters*
- *Electric, Magnetic and Electromagnetic Fields should be scoped in. Animals, including bats are more susceptible to EMF radiation.*
- *Glint and Glare should be scoped in. Solar reflections could cause serious safety issues to horse riders and any screening proposed would take a long while to be effective.*
- *Glint and Glare impact specifically on airfields should be scoped in due to the proximity to Hardwick airstrip.*
- *Impacts and cumulative impacts on remoteness and tranquility should be scoped in. The vast scale of this scheme and the distances it stretches across the landscape, some 15 KM would have a significant impact on the areas' valued sense of remoteness and tranquillity, and these aspects should be scoped into the Environmental Impact Assessment.*
- *All aspects of Cultural Heritage should be scoped in. Maps should be provided with all Listed Buildings marked and all other proposed infrastructure included, at whatever stage, so the true threat to cultural heritage can be estimated. Visualisations should also be provided of the proposed type of infrastructure, its distance and screening in relation to the Listed Building.*
- *All aspects of Human Health should be scoped in. Cumulative impact on human health should also be scoped in.*
- *Rider and horse safety and enjoyment should be scoped in. Impacts on safety for riders and horses of specific equipment, glint and glare, layout, fencing, distances adjoining or running through bridleways.*

- *Water quality or availability impacts to human health should be scoped in. All private drinking water supplies within 1KM of the site should be identified, and all impacts of the development to them scoped in.*
- *Effectiveness of Environmental Mitigation should be scoped in. Mitigation proposals should be created for all endangered species recorded at all sites, both in desk-based and on-site surveys.*
- *Contamination/damage to soil should be scoped in. As this is agricultural land, it should be guaranteed that the land should be returned as agricultural land of the same or better quality at decommissioning.*
- *Environmental impact to common species should be scoped in. This is an area of ancient woodland with herds of red, roe and muntjac deer. It is a core woodland area and part of the UK Woodland Network for Biodiversity, which aims to allow the free migration of species across the landscape to enable genetic diversity.*
- *Wintering/Passerine birds should be scoped in. Several of the proposed land parcels are currently in the Countryside Stewardship Scheme for the protection of farm assemblage birds, specifically lapwing.*
- *Otters and hedgehogs should be scoped in.*
- *Impacts of any lighting, including temporary lighting on wildlife and communities should be scoped in. The impacts of temporary lighting of this scale on wildlife should be scoped in. This is an area with no streetlighting. The impact of any form of night-time artificial lighting on residents and their homes should also be scoped in.*
- *Impacts of permanent motion-sensor lighting on wildlife and communities should be scoped in.* ***Error! Bookmark not defined.***
- *Water and Flooding should be scoped in.****Error! Bookmark not defined.***
- *Arboricultural should be scoped in. There should be full surveys and impact assessments of all hedgerows and trees in all cable corridors and every site.*
- *Employment and income should be scoped in. Impacts to tourism and businesses should be included.*
- *Economic impact to homeowners of changing landuse from agricultural to utility-scale power generation should be scoped in*

From:	clerk.alpington@gmail.com
To:	East Pye Solar
Subject:	East Pye Solar Development
Date:	28 January 2025 12:27:39

From: clerk.alpington@gmail.com <clerk.alpington@gmail.com>
Sent: 28 January 2025 12:24
To: eastpyesolar@planninginspectorate.gov.uk.
Cc: Chairman Alpington <chair.alpington@gmail.com>; clerk.alpington@gmail.com
Subject: East Pye Solar Development

Good afternoon,

Alpington with Yelverton Parish Council strongly object to the proposed East Pye Solar development. Whilst we support renewable energy, this large-scale industrial solar farm is inappropriate for the South Norfolk countryside and will have significant negative impacts on our communities, environment, and heritage.

Key Objections

1. **Scale and Proximity**: The size of this project is unsuitable for an area characterized by small villages and hamlets. The proposed solar fields are also unacceptably close to residential properties (less than 500m).
2. **Visual and Landscape Impact**: The project will replace South Norfolk's peaceful, rural character with industrial-scale infrastructure, including 4.5m-high solar arrays, fencing, and CCTV. Even with screening, it will take decades to restore the landscape.
3. **Loss of Agricultural Land**: The project sacrifices Best and Most Versatile (BMV) arable land, reducing local agricultural productivity and threatening food security.
4. **Harm to Wildlife and Biodiversity**: The area is a priority zone for protected species, contains Sites of Special Scientific Interest (SSSIs), and plays a key role in biodiversity connectivity. The development risks irreparable harm to these habitats.
5. **Environmental and Infrastructure Concerns**: The development will cause significant waste, noise, and light pollution over its 60-year lifespan, with road networks unsuitable for heavy construction traffic.
6. **Public Access and Business Disruption**: Solar fields will obstruct public rights of way and harm local businesses reliant on the countryside, such as tourism and leisure.
7. **Damage to Heritage Assets**: Numerous listed buildings and historic monuments in the area will be negatively affected by the proposal, with significant disruption to their settings.

Conclusion

There are better alternatives for solar development, such as brownfield sites or rooftops, that would avoid the irreversible harm this proposal will cause to our countryside, biodiversity, and communities. We urge you to reject this application to preserve the character, heritage, and environment of South Norfolk

Regards,
Lesley McNulty

Parish Clerk

Alpington with Yelverton Parish Council

www.alpingtonwithyelverton.com

Anglian Water Services
Lancaster House, Lancaster Way,
Ermine Business Park, Huntingdon,
Cambridgeshire. PE29 6XU

www.anglianwater.co.uk

Our ref: East Pye/Scoping con

Joseph Jones EIA Advisor, Planning Inspectorate
By email: eastpyesolar@planninginspectorate.gov.uk

7 February 2025

Dear Joseph,

EAST PYE SOLAR FARM EIA SCOPING NOTIFICATION AND CONSULTATION – ANGLIAN WATER RESPONSE

Thank you for the opportunity to comment on the scoping report for the above project. Anglian Water is the statutory water and sewerage undertaker for the proposed project area, and this response is in our statutory capacity regarding water resources, water supply network, water recycling centres (WRCs), water recycling assets and the sewer network, as well as the related role of surface water drainage.

Anglian Water works to support the construction and operation of nationally significant infrastructure projects that are conducted in accordance with the Water Industry Act 1991. We would expect the next stages of the project to include reference to any existing infrastructure managed and owned by Anglian Water, and any provision of replacement infrastructure or requirements for new infrastructure.

Anglian Water works with developers, including those constructing projects under the 2008 Planning Act, to ensure requests for alteration of sewers, wastewater and water supply infrastructure are planned to be undertaken with the minimum of disruption to the project and customers. We would encourage on-going engagement to ensure that AWS and the developer have reached agreement on the approach to assets and connections in order that these matters in advance of the submission of the draft DCO for examination.

WATER RESOURCES AND FLOOD RISK:
Water Resources:

The Anglian Water region is identified as 'seriously water stressed' in the Environment Agency's 2021 classification of water stressed areas. One specific point for the Environmental Statement (ES) therefore and in view of the potential impacts on water resources, is that the applicant is advised to consider the published Water Resources East Regional Plan which sets out the collective water companies position in the east of England. The AWS Water Resource Management Plan (WRMP) is available on our

website. The AWS Non-Domestic Water Requests policy paper means that the project's ES will need to consider water resources and water efficiency and that a Water Resources Assessment (WRA) will be required to be produced by the applicant and agreed with AWS if non-domestic water demand is likely to exceed 20m^3/day. The WRA will need to address water and wastewater for the project's temporary construction compounds and activities as well for permanent operational sites including the substation and BESS.

AWS recommends that the WRA is an integral part of the Water Resources chapter of the ES (see 5.3 of the applicant's Scoping Report). There does not appear to be sufficient information on the project's water supply requirements during construction and operaiton to suggest that water resources should be scoped out. The flows needed to fill water storage tanks for example (if the Applicant decides not to use rainwater harvesting on site to meet this non potable demand) will need to be assessed by us to advise whether a supply is feasible when assessed in terms of the potential to jeopardise domestic supply or at a significant financial or environmental cost. The Water Resources Assessment (WRA) should set out a daily demand for each stage of the project and whether this is for domestic or non-domestic uses.

The completion of the WRA will enable the project to show that it is maximising water efficiency and protection of finite water resources which are needed to support the region's growth. AWS requests that the AWS WRMP and Drainage and Wastewater Management Plan (DWMP) are added to the Data Sources for the Project.

The Applicant should confirm that there will be no temporary concrete batching facilities (3.15.4) with consequent water demands and would be offsite and so not require an on-site supply. Water requirements for firefighting measures and construction traffic (dust suppression/ wheel washing areas) should also be explained. Further advice on water capacity and options can be obtained by submitting a pre-development enquiry to the Pre-Development Team at: planningliaison@anglianwater.co.uk

Flood Risk:

Anglian Water supports (5.3.4) the preparation of a site-specific FRA and the mitigation measures required to prevent, reduce or offset the residual effects of the project. It is noted that the FRA will also set out the details of the existing surface water drainage regime based on the principles of Sustainable Drainage Systems (SuDS).

We would wish to ensure that any potential embedded design measures such as Sustainable Drainage Systems (SuDS) will effectively manage rainfall run-off and achieve sufficient attenuation to avoid increases in flood risk, whilst offering the potential for integrated water management. Similar factors should be applied to manage surface water run-off at temporary site compounds. AWS is responsible for management of the risks of flooding from surface water which are directed to surface water sewers or combined water sewer systems. Our preference would be for surface water run-off from above ground permanent buildings and impermeable surfacing to be managed by SuDS with reuse opportunities considered first (e.g. for fire suppression during operation and dust suppression during construction), followed by any outfall to a watercourse, in accordance with the drainage disposal hierarchy.

Subject to confirmation that all surface water will be managed through SuDS, Anglian Water would seek to ensure that the draft DCO will have no powers to connect to the public sewer network for the discharge of water during construction or for operations. This would then negate the need for the draft DCO Order to provide for any connection and so require consequent Requirements to ensure any connections did not compromise the wastewater services of existing customers.

TELECOMMUNICATIONS, TELEVISION RECEPTION AND UTILITIES
INTERFACES WITH ANGLIAN WATER ASSETS:
We would expect the Outline Construction Environment Management Plan (OCEMP) and Outline Construction Traffic Management Plan (OCTMP) for the project to include steps to mitigate risk of damage to, and operation of Anglian Water assets within the defined project area, and the draft DCO to include Protective Provisions for Anglian Water.

We agree with the recommendations set out in the Scoping Report (Table 5.4) and would welcome further discussion regarding the inclusion of Protective Provisions for Anglian Water given the potential number of interfaces with our assets within the project area. Anglian Water would welcome engagement with the project promoter to discuss minimising potential impacts on our assets and avoiding the need for diversions as far as possible (section 5.6 of the Scoping Report). It is important that these are identified early on in the project so that these can be included in the ES and planned for appropriately within the Order Limits of the DCO. The suggested approach to address any discussion on utilities such as diversions and other mitigation measures, including Anglian Water assets, within the Other Matters chapter of the ES is acceptable. Further advice on minimising and then relocating (where feasible) Anglian Water's existing assets can be obtained from: connections@anglianwater.co.uk

Anglian Water requires that the following standoff distances are applied for working each side of the medial line of our pipes. The text is drawn from our template Protective Provisions which will need to be agreed with Anglian Water prior to the DCO submission.

> (a) 4 metres where the diameter of the pipe is less than 250 millimetres.
> (b) 5 metres where the diameter of the pipe is between 250 and 400 millimetres, and
> (c) a distance to be agreed on a case-by-case basis and before the submission of the Plan under sub-paragraph (1) is submitted where the diameter of the pipe exceeds 400 millimetres.

These distances are a starting point for design, assessment, diversion or mitigation measures including crossing provisions.

The proposed project area includes water mains, sewers and rising mains which can be in areas beyond the highway verges. Utilities searches should, therefore, be undertaken to establish the extent of our assets within the scheme's application boundary. These should be mapped to establish interfaces with assets and the scheme designed to avoid impacts upon those assets.

Anglian Water would want to ensure the location and nature of our assets serving local communities and strategic water supply infrastructure are identified and protected. To reduce the need for diversions and the associated carbon impacts of those works, ground investigations could enable the Applicant to design out these potential impacts and so also reduce the potential impact on services if construction works cause a pipe burst or damage to supporting infrastructure. Maps of AWS's underground assets are available to view at the following link: http://www.digdat.co.uk/

Anglian Water is aware that a response has already been provided to a land investigation questionnaire relating to AWS's above ground assets and formal easements which included our Hempnall-Fritton Road water recycling centre (WRC). We would want to ensure that 24/7 access is maintained for our WRC so we are able to maintain our operations without impediment and respond to any emergencies on our site. For future reference, you can connect our estates team on: awsestates@savills.com

Our preliminary review of the proposed land parcels for the solar arrays, and access to substation and BESS (Station Rd B1134) indicate that there will be underground assets for many of these areas, and the general cable corridor route linking these sites. In addition, between sites 5 and 7 the area defined for the cable corridor at this stage includes the Hempnall Fritton Road WRC, rising mains, Final Effluent pipe, plus access to WRC.

It is noted that the interconnecting underground cable route between the proposed land parcels for solar panels, will need to undergo careful planning and assessment and will be further refined following these activities, which may reduce the number of interfaces with our assets.

GROUND CONDITIONS:
Sources of Potential Contamination:

Whilst the Scoping Report (5.14.13) identifies the sewage treatment works - Hempnall Fritton Road Water Recycling Centre (WRC) - as a potential location for contamination within the Project area, it should also acknowledge that other sources of contamination (in relation to utility strikes during construction for example) include our sewer network such as the rising mains/pressurised sewers that take flows to the WRC.

We would agree that the risk of contamination could be avoided through routing the cable around Hempnall-Fritton Road WRC and to demonstrate that further mitigation of contamination risks through the inclusion of Protective Provisions for AWS and measures in the OCEMP that address any relevant interfaces with our underground sewer infrastructure. Our water main infrastructure can also cause a pollution risk to freshwater environments, and therefore similar measures will be required for all underground apparatus within the Project area (5.14.25).

Anglian Water is supportive of the measures to be included in the OCEMP to address ground conditions within the Project area (5.14.27) and consider that some of these are also appropriate in terms of managing the scheme's interfaces with our underground assets, which we would seek to discuss with the Project Team further in terms of the additional measures to be included in the OCEMP.

TRANSPORT AND ACCESS:

Given the potential location and extent of the proposed development area, there will be existing Anglian Water assets both above and below ground, which serve the surrounding businesses and community. There are existing Anglian Water assets including several water mains within the project area such as within the highway or its verges which link to the various settlements. The construction of haul roads, bellmouths and temporary construction compounds which when combined with the impact of construction traffic can have an impact on our underground assets, including in terms of soil compaction and vibration (section 11 of the scoping report). Appropriate mitigation measures will need to be agreed with Anglian Water in the OCEMP and OCTMP to minimise damage to our apparatus.

In terms of severance, the Transport Assessment and OCTMP should take address the need to maintain access to Hempnall-Fritton Road WRC.

Next steps

Anglian Water would welcome the progression of discussions with the applicant, in line with the requirements of the 2008 Planning Act and guidance. Experience has shown that early engagement and then agreement is required between NSIP applicants and statutory undertakers during design and assessment and well before submission of the draft DCO for examination. Consultation at the statutory PEIR stage would in our view be too late to inform design and may result in objections and delays to the project, including potentially requests to change the project's Order Limits to ensure Anglian Water services to existing customers and to support growth are not prejudiced. As part of the wider progression of the project alongside the ES, AWS recommends discussion on the following issues:

1. Impact of development on Anglian Water's water and water recycling assets.
2. The design of the project to minimise interaction with AWS assets/ critical infrastructure and specifically to avoid the need for mitigation works and diversions which have associated carbon costs.
3. Requirement for potable and raw water supplies (if any) and the inclusion of the WRA in the PEIR.
4. Requirement for water recycling connections (if any).
5. Confirmation of the project's cumulative impacts (if any) with AWS projects.
6. The Draft Development Consent Order (DCO), including draft Protective Provisions and requirements specifically to ensure Anglian Water's services are maintained during construction.

Advice on the form and content of suitable Protective Provisions in the draft Development Consent Order should be sought. Please do not hesitate to contact strategicgrowth@anglianwater.co.uk on these aspects or should you require clarification on the above response or during the pre- application to decision stages of the project.

Yours sincerely,



Tessa Saunders
Strategic and Spatial Planning Manager

From: [redacted]
To: East Pye Solar
Subject: EN0110014
Date: 11 February 2025 15:44:58

To whom it may concern,

Re: Solar Proposal Objection

We at Aslacton Parish council support Hempnall parish Council's response which incorporates a copy of Block Estate Pye Solar ("BEPS") response against the development.

Kind Regards,

Nicole Ollett
Clerk
Aslacton Parish Council

Objections to the East Pye Solar Farm on behalf of Bergh Apton Parish Council

Dear Sirs

As a parish council of a neighbouring village we have received notification of the proposed East Pye Solar Farm.

These comments are lodged on behalf of the Parish Councillors, people who live in the area and have done for many many years and frequent the villages and facilities offered and which will be affected by these proposals.

Our concerns are as follows:-

1. This project in addition to the proposed building of new homes in the area is and will in the future be close to residential properties and totally negatively changes the appearance of the countryside.
2. The areas affected are small villages and hamlets, with conservation areas, sites of special scientific interest, woodlands, nature reserves, beautiful traditional countryside in which there are historical buildings and properties such as listed buildings. The preservation of these villages and hamlets will be totally destroyed by this expanse of industrial power equipment and the whole ethos of village life, history and beauty will be affected and lost.
3. People choose to live in such villages and hamlets to be away from industry and commerce and wish to bring up their families in a healthier environment. These days mental health is a major consideration to the busy lifestyles many people lead. Family life is crucial in a society where there are many factors eroding this. These ugly structures in the countryside erode into a healthier countryside way of life which people seek and need.
4. Wildlife and biodiversity is detrimentally affected to a large degree. Many species of wildlife are already diminishing to the extent of extinction due to the changing landscape. We have a duty to nurture and protect our wildlife and the biodiversity, and strategic zones for protected species would be affected and/or entirely lost.
5. Should the green light be given to this project, this would only encourage further similar development of solar farms and possible enlargement of these proposed areas.
6. In addition to being a blight on the beautiful countryside, precious agricultural land is being used and one has to wonder if in future years, there will be an acute shortage of such land resulting in the severe reduction/loss in food production in the area. This has to be taken into account in addition to the other development in the country generally and the overall loss of agricultural land for this purpose.
7. Brownfield sites should be given consideration to the location of such sites.
8. Rights of way, bridleways including permissive bridleways and other public access ways will be affected/lost resulting in the loss of enjoyment to villagers and other members of the public.
9. It is understood these solar farm areas require enclosing, screening and CCTV. Any young trees/hedging will take many years to grow to a sufficient height whereby obscuring these unsightly areas and this project will destroy views of the open countryside.
10. The construction and potential maintenance of these solar farm areas will involve large HGVs using the small, narrow, unsuitable countryside lanes. These village roads generally have no speed restrictions and this increased use by HGVs present a danger to walkers, children walking to school, horse riders and dog walkers and result in private verges and driveways becoming damaged and damage to the road surfaces.

11. The development process spans over a 2-3 year period during which residents and users of the villages and their amenities will be detrimentally impacted by the construction and HGVs and increase in traffic in connection with such development.

East Pye Solar Project

Environmental Impact Assessment (EIA) Scoping Report

Date: February 2025

PINS Reference: EN0110014

Response submitted by Brooke Parish Council



Gillian Marklew-Allen, *View from the footpath on EAST PYE SOLAR proposed site 3b looking toward the artist's house in Lundy Green.* Watercolour. January 2025.

Contents

Comments on the Proposed scope of the East Pye Solar EIA 4
Opening Statement in response to the proposed East Pye Solar project 5
Detailed Response to the Environmental Impact Assessment (EIA) Scoping Report 5
NSIP and EIA Process 5
The applicant should justify how this is one NSIP project 6
Justification for this project to meet the government's Net Zero 2030 and 2035 targets should be scoped in 6
Justification for the choice of this specific location for this scale of project should be scoped in 9
Impact on the Broads National Park should be scoped in 10
Proposed scope of the East Pye Solar EIA 10
Exploration of Reasonable Alternatives should be scoped in 11
Cumulative impact should be scoped in across all aspects of the EIS 12
Climate change adaptation should be scoped in 14
Major Accidents and Disasters should be scoped in 14
Air quality and associated risks to human health should be scoped in 15
Telecommunications, Television Reception and Utilities should be scoped in, and also included within Major Accidents and Disasters 15
Electric, Magnetic and Electromagnetic Fields must be scoped in 16
Glint and Glare should be scoped in 17
Glint and Glare impact specifically on airfields should be scoped in 17
Wind Microclimate should also be scoped in 18
Impacts and cumulative impacts on remoteness and tranquillity should be scoped in 18
All aspects of Cultural Heritage should be scoped in 19
All aspects of Human Health should be scoped in. Cumulative impact on human health should also be scoped in. 20
Rider and horse safety and enjoyment should be scoped in 21
Community, identity, culture, resilience and influence should be scoped in 21
Water quality or availability impacts to human health should be scoped in 22
Effectiveness of Environmental Mitigation should be scoped in 23
Contamination/damage to soil should be scoped in 23
Ground conditions should be scoped in 25
Environmental 25
Environmental impact to common species should be scoped in 26
Wintering/Passerine birds should be scoped in 26

Otters should be scoped in 26
Impacts of any lighting, including temporary lighting on wildlife and communities should be scoped in 27
Impacts of permanent motion-sensor lighting on wildlife and communities should be scoped in..... 27
Impact of decommissioning on any Biodiversity Net Gain should be scoped in 27
Water and Flooding should be scoped in..... 27
Private water supplies and drinking water should be scoped in 27
Flooding should be scoped in 28
Arboriculture should be scoped in..... 29
All socio-economic impacts should be scoped in 29
Employment and income should be scoped in 29
Economic impact to homeowners should be scoped in 30
Section specifically on BESS Site/Substation & Grid Connection Infrastructure, Sites 1A, 1B, 2A, 2B, 2C 32
Appendix A: Personal Impact Statements received by Brooke Parish Council..... 39
High Green Gardens..... 39
High Green Gardens , Brooke NR15 1HY..... 39
NR15 1HY. High Green Gardens 41
High Green 42
High Green, Brooke, NR15 1HA..... 42
1. High Green, Brooke, NR15 1JD..... 43
2. High Green, Brooke, NR15 1JD..... 44
3. High Green, Brooke, NR15 1JD..... 45
4. High Green Brooke NR15 1AN..... 46
5. High Green, Brooke, NR15 1JD..... 46
6. High Green, Brooke, Norfolk NR15 1JE..... 47
7. High Green, Brooke, NR15 1JD..... 47
8. High Green Brooke, NR15 1JD Personal Impact Statement. 48

Comments on the Proposed scope of the East Pye Solar EIA

The topics East Pye Solar propose to scope into the assessment are:

- Cultural Heritage
- Landscape & Visual
- Ecology & Biodiversity
- Transport & Access
- Noise
- Climate Change
- Soils and Agricultural Land

Areas East Pye Solar have requested to scope out which Brooke PC requests are included:

- Air Quality
- Water Environment
- Major Accidents and Disasters
- Electric, Magnetic and Electromagnetic Fields
- Telecommunications, Television Reception and Utilities
- Wind Microclimate
- Daylight, Sunlight and Overshadowing
- Glint and Glare
- Lighting
- Minerals
- Waste and Materials
- Socioeconomics
- Human Health
- Arboriculture; and
- Ground Conditions

Brooke Parish Council requests that all these topics are included in the Scoping for the proposed Environmental Impact Assessment. The supporting text for each heading is included in the remainder of this document, along with statements reflecting human impacts as personal impact statements to reflect the impact of these vague proposal on the community.

It is notable that, contrary to what East Pye Solar claim, all these aspects pose significant impacts, which are either extremely challenging to mitigate or which question the viability of the entire project. We call for these areas to be scoped into the Environmental Impact Assessment, with our reasons outlined below.

East Pye Solar also propose to scope out subsections of categories that would be otherwise included in the Environmental Impact Statement. Again, this appears to be because they pose significant impacts that are impossible to mitigate, and they are therefore hoping not to address them publicly in detail.

Dr Jonathan Newman

Chairman, Brooke Parish Council

February 10th, 2025

Opening Statement in response to the proposed East Pye Solar project

The area proposed to site the East Pye Solar utility-scale power plant is a valued, tranquil and unspoilt agricultural landscape of small Domesday Book villages, hamlets and isolated farmsteads with dark skies and a unique biodiversity (South Norfolk Claylands), including maternity roosts of critically endangered barbastelle bats in multiple locations across the area. It has many village conservation areas, Grade I Listed churches, and a nationally significant collection of Grade II* and Grade II Listed medieval farmsteads. These building 'are of great historic and architectural interest and form one of the most widespread and impressive survivals of pre-1750 farmstead buildings.[1] '

East Pye Solar admit they are unable to list all the Grade II Listed buildings impacted by this scheme beyond 100m - they have had to create an entire separate volume, because there are simply too many of them. The landscape has associations with the Norwich painter John Crome and Sir Alfred Munnings, and many of the buildings affected by this scheme are listed in Pevsner's *Buildings of England* (first published 1962). This is indicative of the value of this landscape and its cultural heritage and demonstrates that this utility-scale power plant project, stretching across some 15KM of our landscape is entirely inappropriate for this location.

Detailed Response to the Environmental Impact Assessment (EIA) Scoping Report

NSIP and EIA Process

The level of detail contained in East Pye Solar's EIA Scoping document is inadequate to show compliance with legislation and the "best practice" as quoted by EPS.

The use of almost 5000 acres of scattered parcels of agricultural land to build a 2300-acre solar farm is environmentally reckless and lacks specific information on which to comment in detail.

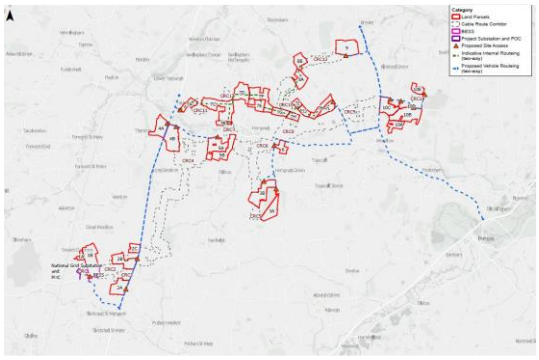
The repeated use of 'could, may and consider' implies minimal contractual obligation for the principal contractor to comply and a very low ROI.

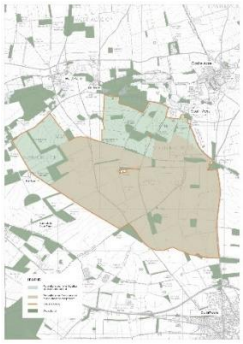
There are insufficient skilled UK contractors, equipment or materials (particularly cement) to satisfy the needs of all the planned development projects.

[1] Natural England, *National Character Area Profile 8: South Norfolk and High Suffolk Claylands*.

The applicant should justify how this is one NSIP project

How can this be considered one project given that it is at 10 sites stretching across some 15km and 14 separate parishes and therefore requires such quantities of cabling as to cause significant damage to such an extensive area of landscape? This project is neither discrete, efficient, nor compact like Island Green's other proposed Norfolk NSIP solar project The Droves.





Due to the level of detail required to respond to the proposals for the BESS Site/Substation & Grid Connection Infrastructure, Sites 1A, 1B, 2A, 2B, 2C will be addressed separately at the end of this documents.

Justification for this project to meet the government's Net Zero 2030 and 2035 targets should be scoped in

We believe that East Pye Solar is surplus to requirements.

East Pye Solar states that 'the UK government intends to increase solar capacity to 70GW by 2035'.[2] It fails to state that the Government only plans to site 900MW of that in the East of England to meet its 2035 target.

The UK government's target for 2030 is 47GW.[3]The transmission entry capacity register (TEC register) currently (January 2024) has over 500 solar projects in the queue 'with a combined capacity of just under 200GW'.[4] NESO states that 'the 2030 connection queue has higher capacities of solar and onshore wind than is required.'[5]

[2] Josh Cornes, 'Breaking down the solar grid connection queue', 8 January 2025, *Solar Power Portal*.
[3] UK Government, *Clean Power 2030 Action Plan: A new era of clean electricity*, pg. 32.
[4] *Idem.*
[5] NESO, *Clean Power 2030*, pg. 27.

The UK Government *Clean Power 2030 Action Plan* explains that the UK as of 2024 already has 16.6GW of solar in operation, has a further 23.8GW committed or under construction, and only needs 47GW of solar power in total to meet its 2030 target:[6]

The UK Government states: 'to achieve Clean Power 2030, technological and locational factors need to be considered in the connection process so the right projects can connect in the right place at the right time.'[7] UK Government clearly states that it only requires an additional 100MW of solar power to be situated in the whole of the East of England to meet its 2030 Net Zero target and only another 900MW to meet its 2035 target.[8] It also only requires another 200MW of battery storage to meet its 2035 target for the East of England.[9] There is already a 228MW BESS applying for planning permission 700m west of Long Stratton.[10]

Table 2: Regional capacity breakdowns for transmission connected technologies required for 2030[20] and 2035[21]

Transmission network region	Solar (MW) 2030	Solar (MW) 2035	Onshore wind (MW)[22] 2030[23]	Onshore wind (MW) 2035	Batteries (MW)[24] 2030	Batteries (MW) 2035
N. Scotland	100	800	5,500	-	1,900	1,900
S. Scotland	600	800	8,800	-	3,900	3,900
N. England	500	1,400	-	-	800	800
N. Wales, the Mersey and the Humber	1,200	1,700	300	-	4,200	4,200
Midlands	4,000	5,200	-	-	1,300	1,300
Central England	2,100	3,300	-	-	500	500
E. Anglia	100	900	-	-	200	200
S. Wales and the Severn	1,100	1,300	1,300	-	900	900
S.W. England	300	300	-	-	400	400
S. England	200	200	-	-	100	100
South East England	600	1,100	-	-	1,700	1,700
GB total	**10,800**	**17,000**	**15,900**	**-**	**15,900**	**15,900**

Note: MW capacity figures have been rounded to the nearest 100 MW.

By the time 500MW East Pye Solar comes to Inspection at the end of this year, both the 100MW target for 2030 and the 900MW target for 2035 for the East of England will already have been met by solar projects ahead of it in the queue currently being examined.

The government also does not specify that this additional 900MW of solar capacity for the East of England must be ground-mounted, nor that it should be sited on productive agricultural land. Indeed, they state that brownfield sites should be used for new

[6] UK Government, *Clean Power 2030 Action Plan: A new era of clean electricity*, pg. 73.
[7] UK Government, *ibid.*, pg. 66.
[8] UK Government, *Clean Power 2030 Action Plan: A new era of clean electricity*, connections reform annex pg. 13
[9] *Idem*.
[10] Green Switch Capital, Wacton Road Energy Storage Facility. Home | Green Switch Capital

infrastructure, and that food security is national security.[11] Italy has now banned ground-mounted solar on agricultural land[12], and France only permits it if it can be guaranteed that the land will continue to produce the same quantity of crops once the solar infrastructure is installed.[13]

The UK Government acknowledges that for the period between 2030 and 2050, it should focus on renewables projects that have long lead-times and use new technology, such as hydrogen and Small Modular Nuclear Reactors. In the hydrogen and nuclear evolution scenario, the demand for solar will be significantly reduced.[14]

The EPS scoping document outlines: 'Part 3 of EN-1 identifies the need that exists for nationally significant energy infrastructure. With regards to decision making, paragraph 3.2.2 of EN-1 states:

"We need a range of different types of energy infrastructure to deliver these objectives. This includes the infrastructure described within this NPS but also more nascent technologies, data, and innovative infrastructure projects consistent with these objectives".

This is neither an example of nascent technology, nor an innovative infrastructure project. Beyond 2035 renewables technology will have advanced to such an extent that out-dated ground-mounted solar projects on BMV agricultural land such as the East Pye Solar scheme will have been replaced by more efficient technology that does not jeopardise food security.

Despite this clear set of UK Government requirements for only 100MW of additional Solar in the whole of the East of England by 2030, and only 900MW by 2035, East Pye Solar is one of four NSIP utility-scale solar projects with agreed TEC register grid connections currently scoping in the small area between Long Stratton and Gissing in South Norfolk. The potential generation capacity of these NSIP solar projects totals over 2.2GW, more than double the 900MW required to meet the Government's 2035 Net Zero targets for the whole East of England.

Even Solar Power Portal, the solar industry's own website, states: 'With less focus on transmission connected projects, almost the entire capacity targeted for before 2030 is already in planning, creating little room for any projects at the pre-planning stage.'

[11] UK Food Security Report 2024, 'Food security is national security', Labour says in manifesto - FarmingUK News
[12] Italy bans PV from agricultural land – pv magazine International
[13] France issues new rules for agrivoltaics – pv magazine International
[14] Neso, *Future Energy Scenarios: pathways at a glance*, pg. 14.

Justification for the choice of this specific location for this scale of project should be scoped in

Although East Pye Solar quotes paragraph 4.1.5 of EN-1 which 'states that in considering any proposed development, and when weighing its adverse impacts against its benefits, the SoS should take into account:

"Its potential benefits including its contribution to meeting the need for energy infrastructure, job creation, reduction of geographical disparities, environmental enhancements, and any long-term or wider benefits.

Its potential adverse impacts, including on the environment, and including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce, mitigate or compensate for any adverse impacts, following the mitigation hierarchy".[15]

East Pye Solar have already openly admitted that local communities will gain no socio-economic benefits whatsoever from this project, neither in terms of employment, skills nor even any energy from it.[16] They have also admitted, in a landscape with ancient woodland, endangered species and particularly barbastelle maternity roosts, that this project is likely to cause significant irreversible and totally unacceptable damage to ecology including (*sic.*):

- Habitat loss, disturbance or fragmentation (during construction and decommissioning);
- Disturbance, displacement, or mortality of wildlife (during construction, operation, and decommissioning);
- Disturbance, damage or loss of protected species breeding sites, hibernation sites or resting places (during construction, operation (panel replacement), and decommissioning);
- Noise and/or visual disturbance to species using the Sites (during construction, operation (panel replacement), and decommissioning);
- Impacts to designated sites or habitats through generation of dust or other pollutants (during construction, operation (panel replacement), and decommissioning); and
- Disturbance and pollution (indirect effects such as noise and vibration, dust, pollution, surface water run-off during construction, operation (panel replacement), and decommissioning)[17]

There are so many Listed Buildings surrounding this proposed scheme that the applicants have had to create an entire extra gazetteer to list them all: **it is 67 pages long.** EPS state: 'It is considered that there is the potential for likely significant effects upon the historic

[15] 1.8.26
[16] East Pye Solar EIA Scoping document, 5.11.6, pg. 133-137.
[17] East Pye Solar EIA Scoping document, 8.8.7, pg. 208.

environment resulting from the Scheme, based on the current proposals at the time of writing. These may include:

- Direct impacts upon archaeological features and deposits resulting in their partial/total loss as a result of construction; and
- Indirect impacts on the significance of designated heritage assets through changes to their settings, as a result of the presence of construction or decommissioning activities, or operation of the Scheme.'[18]

EPS quote EN-1 that 'public benefit must be weighed against any loss or harm to the significance of a designated heritage asset (Section 5.9.32 to 5.9.33). However, this project is of a scale in excess of requirements to the UK government's own 2030 and 2035 Net Zero targets; there is therefore no public benefit, either to the wider UK population or to the local community, as EPS have openly admitted.

From the outset, it is clear that this project is completely inappropriate for this location.

A justification for why there is any need for an NSIP solar project in this specific location, or indeed for the East Pye Solar project at all, should be scoped in. This should be addressed particularly in relation to other proposed NSIPs in Norfolk ahead of East Pye Solar in the inspection queue. RWE's High Grove solar NSIP (720MW) and Island Green's other proposed solar NSIP, The Droves (500MW), both in Norfolk, combined would generate 1.2GW of power, just by themselves exceeding the government's remaining 900MW goal for the entire 2035 solar requirements of the East of England.

Impact on the Broads National Park should be scoped in

Site 3a lies only 2 miles from the Broads National Park. Broads Authority's documents state that projects planned within 3 miles of their boundaries should consult with them.[19]

Proposed scope of the East Pye Solar EIA

The topics East Pye Solar propose to scope into the assessment are:

- Cultural Heritage
- Landscape & Visual
- Ecology & Biodiversity
- Transport & Access
- Noise
- Climate Change
- Soils and Agricultural Land

[18] *Ibid*, 9.6.2, pg. 232

[19] https://www.broads-authority.gov.uk/__data/assets/pdf_file/0025/184813/photovoltaics-1,-2-App-3-Part-2.pdf https://www.broads-authority.gov.uk/planning/planning-policies/landscape-sensitivity-studies

Areas East Pye Solar have requested to scope out the following categories:[20]

- Air Quality
- Water Environment
- Major Accidents and Disasters
- Electric, Magnetic and Electromagnetic Fields
- Telecommunications, Television Reception and Utilities
- Wind Microclimate
- Daylight, Sunlight and Overshadowing
- Glint and Glare
- Lighting
- Minerals
- Waste and Materials
- Socio-Economics
- Human Health
- Arboriculture; and
- Ground Conditions

It is notable that, contrary to what East Pye Solar claim, all these aspects pose significant impacts, which are either extremely challenging to mitigate or which question the viability of the entire project. **We call for these areas to be scoped into the Environmental Impact Assessment,** with our reasons outlined below.

East Pye Solar also propose to scope out subsections of categories that would be otherwise included in the Environmental Impact Statement. Again, this appears to be because they pose significant impacts that are impossible to mitigate, and they are therefore hoping not to address them publicly in detail.

Exploration of Reasonable Alternatives should be scoped in

East Pye solar quote paragraphs 2.10.19 – 2.10.48 of EN-3, which set out the following key considerations involved in the siting of a solar farm, in addition to considerations specific to individual projects:

- *'Irradiance and site topography*
- *Network connection*
- *Proximity of a site to dwellings*
- *Agricultural land classification and land type*
- *Accessibility*
- *Public rights of way*

[20] *Ibid,* 5.1.1, pg. 96

- *Security and lighting'*

This project, by its own admission, would cause glint and glare to six airstrips to an extent that the Norfolk Gliding Club would cease to be able to operate; it is mainly located 15KM from its proposed network connection; it impacts hundreds of residences, the majority of which are Listed Buildings, and adjoins and even completely surrounds some individual homes and businesses; it is all sited on BMV agricultural land of grades 2, 3a and 3b; the narrow, single-track country lanes make it completely inaccessible for heavy goods vehicles without having to build new roads across agricultural land; it impacts around 30km of public rights of way, either temporarily or permanently; it proposes floodlighting both during construction and operation **in a dark skies area** with no streetlighting with maternity roosts of barbastelle bats, a wide range of other protected bats, owls and other night-dwelling creatures.

In every aspect of the list they quote, this project fails to satisfy any of its own requirements. The magnitude of change and impact would be extremely high.

Due to this, these questions regarding reasonable alternatives should be scoped in:

- How have reasonable alternatives been considered?
- Present assessments of alternative location and sites. Date and reasoning for selection of this site.
- How have considerations been made of options with less damaging effects on the environment been carried out, to deliver the greatest environmental gains.
- Which brownfield sites, and sites not on BMV agricultural land have been considered?
- Provide a summary record on their decision-making on alternatives.
- Why do the panels need to be 4.5m and 3.5m high? This is an Irish-owned company and in Ireland the maximum panel height is 2m.
- Why is this plan the best it can be?
- Summary of cumulative effect of how this project benefits the landscape and community in terms of design and amenity.

Cumulative impact should be scoped in across all aspects of the EIS

There are already multiple solar projects either in operation, or consented for construction in South Norfolk, as well as another three with grid connections agreed in the same area.

Built:

- Tasburgh
- Trowse 1 and 2
- Bracon Ash solar and BESS

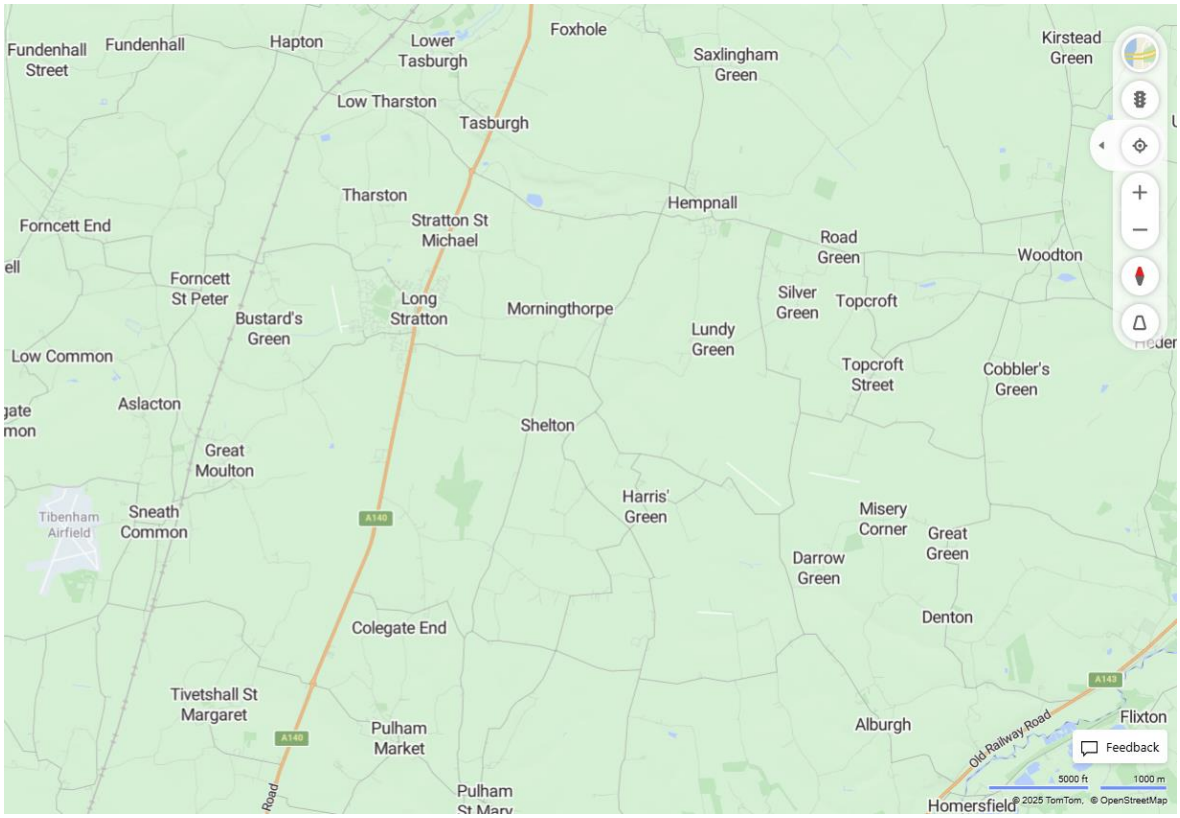
Consented:

- Bloys Grove 49.9MW

Scoping: These projects have not been added into the potential cumulative impact in EPS documentation

- Long Stratton 400KW + BESS (Location unknown, South and West of Long Stratton)
- Green Switch Capital, Wacton Road Energy Storage Facility (BESS), 228MW
- Noventum – Long Stratton 500KW + BESS (scoping immediately adjoining East Pye Solar scheme, north of Long Stratton and Hempnall, around Shotesham (EPS site 8)
- Gissing 900KW + BESS (location unknown, directly south of Easy Pye Solar scheme between Long Stratton and Diss)
- Maltings solar farm at Tivetshall (directly adjoining East Pye Solar BESS site to the west).

As listed above, East Pye Solar is one of FOUR NSIP projects with agreed grid connections for utility scale solar power plants just in the small area outlined on this map, between Gissing (lower left) and Long Stratton. These projects could remove around 17,000 acres of agricultural land from farming use. This quantity of solar infrastructure in this rural/agricultural area on the edge of the Broads National Park is inappropriate and of excessive scale and impact.



In addition to this, RWE are in pre-application stage for High Grove Solar Farm 700KW in South-West Norfolk. East Pye Solar's parent company Island Green already owns Trowse 1

and Trowse 2 solar plants, to the north of this proposed site. They are also developing plans for the Droves 500KW, another NSIP utility-scale site in South-West Norfolk.

Other infrastructure consented or planned for the area:

- Norwich to Tilbury Pylons
- Orsted BESS (south of A47)
- 1,800 houses plus associated infrastructure, new school, surgery, landscaping associated with the Long Stratton by-pass. Immediately to east of East Pye Solar Scheme.

These developments, particularly the excessive number of proposed NSIP solar farms are likely to have significant cumulative impacts on all aspects of the EIA, particularly ecology including common species, tourism, landscape and visual amenity, cultural heritage, transport (including PRoW), noise and vibration and particularly on human (mental) health, economic and wellbeing for all phases of the project. The cumulative impact of all these schemes should be scoped in from the start.

Climate change adaptation should be scoped in

As recently ruled in Scotland regarding the Rosebank and Jackdaw oil and gas fields, there should be a full impact assessment of the climate altering emissions and impacts to human health and human rights in the countries in which the panels and other equipment are manufactured, as well as the carbon footprint of the project, including global shipping and disposal of waste. Population health is not only our own populations but its impact on all populations involved in this project's creation.

For this reason, **Waste and Materials should also be scoped in** to demonstrate how and where damaged panels will be recycled, or all equipment will be recycled at the end of its lifespan. Chinese panels should not be used for this project if they contain PFAS and are unable to be recycled in the UK. It is particularly important to know how unrecyclable materials will such as PFAS (forever chemicals) be dealt with, and how all land will be decontaminated and returned either to its former agricultural grade or an improved grade once the project is decommissioned. Figures in the EIA to calculate waste production are currently incorrect by a factor of two.

Major Accidents and Disasters should be scoped in

Section 5.14 Human Health and **Section 5.4 Major Accidents and Disasters**. Absolutely must be scoped in. EPS admits 'In the unlikely event of a fire within the BESS, unplanned air emissions could result in the release of Hydrogen Fluoride (HF), which may impact nearby receptors depending on the location of the BESS in relation to sensitive receptors and the design of the BESS. However, this is unlikely to occur. A key design principle applied to the

design is that BESS will not be located closer than 100m to sensitive human receptors (as described above) which will be secured through the DCO.'

The current proposed site for the BESS is upwind from a village. The Fire Service is not a statutory consultee on this project.

There have been a significant number of BESS fires now globally, with some in the UK taking as long as 59 hours to put out. How would such a fire be extinguished, given that BESS fires are currently left to burn out. The BESS should be sited significantly further away from habitation if the fire is to be left to burn.

Would fire suppressants be used? If so, which? The proposed BESS site is on a drinking water protection area and river catchment protection area, there is a significant risk of PFAS pollution of both drinking water, ground water and local rivers if there were to be a BESS fire. The environmental impacts of such a disaster to local residents and wildlife, as well as soils and rivers should be scoped in.[21]

Air quality and associated risks to human health should be scoped in

'An assessment of air quality effects during operation is therefore scoped out of the ES.' Impact of potential damage to air quality from BESS fire should be scoped in, and associated risks to human health.

Other major impacts such as storm damage should be scoped in, especially in light of the Storm damage to the Solar farm on Anglesey.[22] How would contamination to soils and ground water from toxic materials in the solar panels be averted in the result of such a storm?

The impact on surrounding homes, listed buildings and ecology of any explosion from the unexploded ordnance on sites 3a and 3b should also be scoped in.

Telecommunications, Television Reception and Utilities should be scoped in, and also included within Major Accidents and Disasters

Several of the proposed sites for solar panels (5, 7E and 7F and 8) are on top of the high-pressure gas pipeline that runs through Norfolk from Bacton, which is classed as a Major Hazard (MAHP). The proposed 400kV substation on site 5 and the welfare buildings for workers are also proposed to be built on it. The cable corridor would also potentially cross it.

[21] Environmental risk evaluation reports: Per- and polyfluoroalkyl substances (PFAS) - summary - GOV.UK
[22] Solar Farms and Wind Turbines Tested and Failed by Storm Darragh | TheCivilEngineer.org

This is a significant risk not only to the PV farm but also to the surrounding area and public safety.

'PV farms carry an increased risk of a strike and lightning surge currents are of a magnitude and duration that could pass from any lightening protection or electrical the earth system to the pipeline.'[23]

'Pipeline operators are required to consider societal risk, the boundaries for calculating this, is often outside the wayleaves and easements and extend a considerable distance. increased population density and infrastructure on these zones could alter the area classification of the pipeline.'[24]

Limits are placed on 'vibration levels allowable near the pipelines – particular attention should be made to distances for piling…' [25]Any damage or potential damage to MAHP pipelines 'is likely to lead to serious safety, environmental and/or security of supply issues.'[26] The siting of a 400kV substation in close proximity to it, is also therefore of serious concern.

There are also pylons and overhead cables crossing several of the sites, that will require continued access to their easements. This may require additional access tracks or areas where development is not permitted. There are also impacts to siting solar infrastructure beneath overhead cables, such as lightning strikes, damage from falling cables or falling ice, earthing of metal fencing, rising of earth potential around base of pylons.

It is therefore essential that Utilities are scoped in and the whole section on Major Accidents and Disasters should be scoped in. It should also be scoped into the related aspects of other sections, particularly human health, utilities, air quality and ecology.

Electric, Magnetic and Electromagnetic Fields must be scoped in

Assessments of electric, magnetic and electromagnetic fields should be scoped in, particularly in areas where overhead cables and pylons are proposed to be used, also in areas to be grazed by animals (*e.g.* cable corridors). Animals are more susceptible to EMF radiation than humans and significant impacts to cattle from EMF have been reported.

There should also be a thorough evaluation of EMF effects on sensitive species such as bats. There is evidence that bat activity significantly reduces in habitats exposed to an EMF strength of greater than 2v/m. As we have very large bat populations, particularly of rare bats, Electric, Magnetic and Electromagnetic Fields must be scoped in.

[23] UKOPA, 'Good Practice Guide: Managing developments and works in the proximity of high-pressure pipelines', January 2022, pg.
[24] Ibid. pg 8.
[25] Ibid. pg. 10.
[26] Ibid. pg. 10.

Glint and Glare should be scoped in

EPS suggest that: 'No significant impacts from glint and glare are considered possible upon pedestrians/ users along PRoW. The reasoning is due to the sensitivity of the receptors (in terms of amenity and safety) being concluded to be of low significance. '[27]

This assumption is incorrect, as there is a significant safety impact to horse riders on bridleways. There is a significant safety hazard associated with reflections towards a horse and rider on a bridleway, especially if the bridleway is to be fenced on both sides, so preventing the rider from circling in the event that the horse bolts due to glare. This is also a significant glare impact to horse riders on public roads, and assessment of these impacts should also be scoped in.

'Solar reflections towards sections of the A140 and B1527 are within a road user's primary field-of-view and visible. Therefore, mitigation would be recommended for these sections of road.' There should be a detailed assessment of the impact of glint and glare in this location and proposed mitigation should be modelled to test whether it would be effective and whether there would be any interim impacts. If screening is proposed as mitigation, then an assessment should be made of how long it would take for this to prove effective, given the height of the infrastructure.

EPS states: 'The duration of solar reflections towards some residential dwellings occur for more than three months but less than 60 minutes on any given day. Therefore, mitigation would be recommended for these dwellings.' This is a significant impact and should be scoped in. Detailed plans should be submitted of the proposed mitigation for each affected residence. If screening by native hedges/trees is proposed, it would take a decade to grow tall enough to have any effect. Therefore, there needs to be a proper assessment of the interim impact of glint and glare on affected homes until any 'native species' screening is effective. There should also be an impact assessment of whether the solar arrays sited around houses would increase the heat of the air or soil at those properties, which could cause impacts to buildings and residents.

Glint and Glare impact specifically on airfields should be scoped in

Since East Pye Solar has chosen to situate its project in an area with six active airfields, it is imperative that glint and glare should be scoped into the Environmental Impact Assessment,

[27] East Pye Solar EIA Scoping document, 5.7.23, pg. 123.

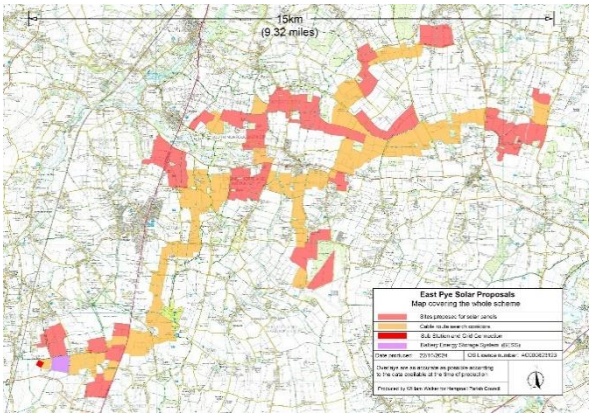
particularly where this poses an existential threat to existing airfield operations, resulting in a potential threat to life.

'Solar reflections towards some aerodromes are greater than the acceptable limits of 'low potential for temporary after-image' and would therefore require consideration to the aerodrome's specific operations.'[28] The EPS document specifically says that Norfolk Gliding Club may be impacted by glint and glare, affecting their flying activities, and that this cannot be readily mitigated: 'Existing operation of the Norfolk Gliding Club may be affected as a result of glint and glare from the photovoltaic panels affecting flying activities.' [29] Therefore, it is completely unacceptable to attempt to scope Glint and Glare out of the Environmental Impact Assessment. Especially as Norfolk Gliding Club state that the person sent to do the initial assessment has neither experience nor understanding of the issues specifically associated with gliders. A full glint and glare assessment specifically relating to the six airfields impacted by this scheme must be scoped in, for the complete range of aircraft that use those facilities. No existing airfield should lose its function or ability to operate due to a new planning proposal.

Wind Microclimate should also be scoped in due to impact for airstrips and gliding club.

Impacts and cumulative impacts on remoteness and tranquillity should be scoped in





By East Pye Solar's own admission, this is an undeveloped area with a valued sense of remoteness and tranquillity. It has stayed historically intact and unspoilt because it avoided the effects of the Industrial Revolution. It is important that these few remaining untouched areas of rural England should be protected from development to preserve their integrity for

[28] East Pye Solar EIA Scoping document, 5.7.24, pg. 123
[29] East Pye Solar EIA Scoping document, 5.11.6, pg. 135

future generations. The vast scale of this scheme and the distances it stretches across the landscape, some 15 KM would have a significant impact on the areas' valued sense of remoteness and tranquillity, and these aspects should be scoped into the Environmental Impact Assessment.

All aspects of Cultural Heritage should be scoped in

Ours is a rural landscape with wide-open spaces and expansive views. The scale, size and industrial appearance of the proposed East Pye Solar power plant would have a significant impact on the settings of conservation areas (several directly adjacent to the proposed sites) and the settings of multiple Listed Buildings of all grades. EPS state:

'Due to their prevalence in the area, Grade II Listed Buildings are reported up to 100m only.'





l-r: directly opposite site 5b; directly opposite site 4b; directly adjacent to site 5b.)

The large number of Listed Buildings impacted by this proposed scheme is because this is an area of high historical significance. It is inadequate to only list the impact to Grade II Listed Buildings within 100m of the site, as due to the flat and expansive nature of the landscape and the height of the proposed infrastructure (4.5 or 3.5m high), it is very likely that it will significantly negatively impact the settings of multiple Grade II Listed buildings at a greater distance than 100m from the sites. Its impact on the area as a whole will damage the importance of this area as a largely untouched nationally significant collection of pre-1750s agricultural buildings. As these buildings are primarily farmsteads and rural churches, their appropriate protected settings are rural and agricultural, not industrial.

The range of assessment of Grade II Listed Buildings should be increased to at least 500m (the best-practice distance of any residence from solar infrastructure), if not further, with sightlines tested for those assets impacted at an even greater distance where there is any visual impact. It should also be noted that the distances measured should be from the edge of the curtilage of the Listed Building, not from the Listed Building itself.

There may also be other impacts to Listed Buildings in terms of vibration from construction and impacts or vibration from traffic (particularly to Listed retaining walls or structures along narrow lanes). Timber-framed and clay lump buildings are particularly susceptible to damage from vibration, and this is the construction method of most of our pre-1750s farm buildings.

As it is proposed that native hedging/trees will be used for screening purposes, there will be at least a decade until such new plantings reach a height adequate to screen infrastructure that is either 4.5 or 3.5m high. The significant negative interim impacts to cultural heritage should also be scoped into the assessment.

Direct and indirect impact to cultural assets during the construction and decommissioning phases should be scoped in, as there are risks to timber-framed and clay lump buildings from vibrations and direct impact from large vehicles.

The cumulative impacts to cultural heritage of all the proposed developments listed above should also be scoped in. Some of these buildings, specifically the timber-framed farmhouse in the image above, are already being impacted by other projects, in this instance the Long Stratton Bypass.

Maps should be provided with all Listed Buildings marked and all other proposed infrastructure included, at whatever stage, so the true threat to cultural heritage can be estimated. Visualisations should also be provided of the proposed type of infrastructure, its distance and screening in relation to the Listed Building.

All aspects of Human Health should be scoped in. Cumulative impact on human health should also be scoped in.

This utility-scale power scheme is already having significant mental health and wellbeing impacts on the community. This is both in terms of the threat of the scale and extent of change, and permanent damage to residents' attachment to place and their visual amenity. The cumulative impact on human health, particularly mental wellbeing, of these four utility-scale solar power plants with connection agreements, potentially covering some 17,000 acres of our landscape in South Norfolk should be scoped in. Residents impacted by the scheme/s are already reporting significant feelings of anxiety, powerlessness and despair.[30]

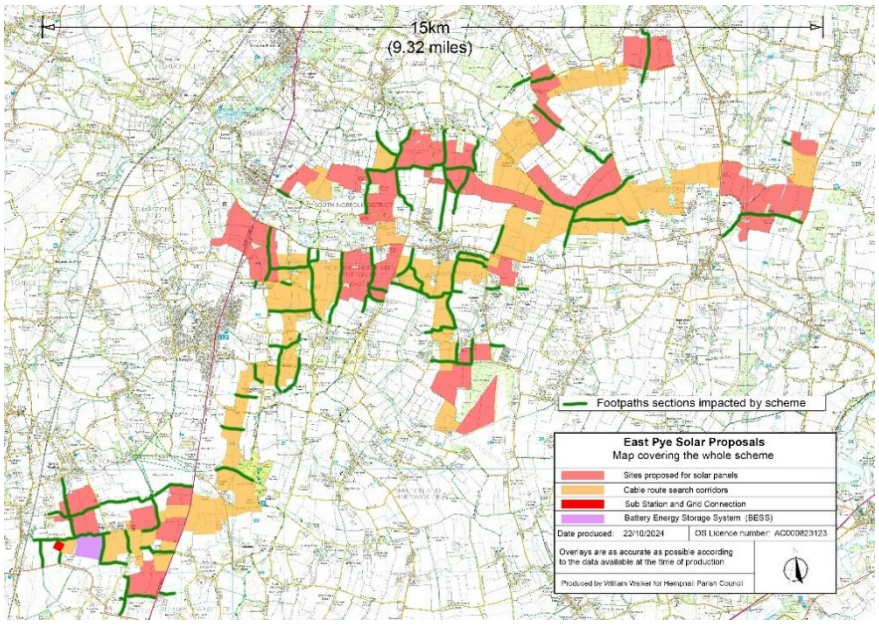
See Appendix A for a selection of personal impact statements from residents of Brooke directly adjacent to the proposed Plot9.

Impacts to human health of a BESS fire and mental health should also be scoped in as EPS have chosen to site their battery site upwind from a small rural Domesday Book village with a population of less than 1000 and a large number of listed buildings. Community safety is also impacted by the siting of the BESS and should be scoped in.

A significant number of Public Rights of Way will be impacted by this scheme. No one is going to walk along footpaths or bridleways between hundreds of acres of 4.5m high solar

[30] 'People Versus Power', *The Observer*, 29 December 2024. Solar farms v people power: the locals fighting for their county | Solar power | The Guardian

panels with 2.5m high fencing and security cameras.[31] It will also be unsafe to ride in these areas. This project will have a very significant impact on the ability of walkers and riders to be able to enjoy the countryside. The actual impact will be that we will lose these rights of way because they will be so visually unappealing covered in industrial infrastructure in our rural landscape that there will be no reason to continue to use them. As this project would impact so many of our PRoW, the impact of this loss of use on human health should be scoped in.



Rider and horse safety and enjoyment should be scoped in

A baseline for rider and horse safety and enjoyment of bridleways should be included. This is not mentioned at all in the project plan. Impacts on safety for riders and horses of specific equipment, glint and glare, layout, fencing, distances adjoining or running through bridleways. Baseline and impact modelling of specific situations including spooking, bolting, rearing in current situation compared to alongside or in the middle of solar equipment and infrastructure that will be installed on each specific site.

All foreseen impacts for riders and horses during construction and decommissioning both on roads and bridleways and mitigations proposed.

Community, identity, culture, resilience and influence should be scoped in

The scale of the proposed 300- to 700-person workforce is equal to or larger than the populations of some of the hamlets affected.

[31] East Pye Solar EIA Scoping document, 5.12.9, pg. 140–3.

Community, identity, culture, resilience and influence – how the community perceives their surroundings – will be changed for the rest of their lives as this project has a span of 60 years, therefore this should be scoped in. The community feedback submitted to EPS so far is overwhelmingly against this project. There is no sense whatsoever that it will foster a 'sense of pride', as EPS absurdly and incorrectly state. So far, the project proposal has created only community division, with individual farmers siting infrastructure directly around their neighbours' houses, causing mental anguish and putting families in negative equity. The project is so far only fostering a sense of communal devastation and mourning at the proposed destruction of our landscape.

The initial consultation process was completely inadequate as there were no definitive plans ton which to consult accurately, questions asked by attendees were not able to be answered and the whole process did not fit the definition of a consultation, more of a scaremongering exercise without any basis for the justification for the project.

Other questions that need to be answered.

- How will these temporary workers get to work, move around or purchase food? Their car use has not been included in the traffic management plans.
- Where will the proposed portacabin shanty town be situated? There is currently inadequate public transport to reach these site locations, specifically for these quantities of workers.
- Seasonal agricultural workers already use the limited public transport, how will it sustain the addition of 300 to 700 additional workers in the area?
- Who will these people be, where will they come from? What safeguarding checks will be made about them before bringing them into our communities?
- Additional traffic on tiny country lanes, parking, sewage, refuse etc should be fully assessed. The EPS assessment of the populations of these tiny hamlets are inaccurate – they are in rural areas, away from the large villages they discuss.

Water quality or availability impacts to human health should be scoped in

The project is proposed to be in an area of numerous sensitive private groundwater water supplies, on areas protected for drinking water quality. All private drinking water supplies within 1km of the site should be identified, and all impacts of the development to them scoped in.

EPS has already admitted that construction and decommission will cause run-off and silt. Toxic substances such as concrete, galvanised steel (zinc and lead) and aluminium are proposed to be pile-driven up to 4m into drinking water protection zones within close proximity to wells and boreholes. Contamination from microcracking caused by weathering and storm damage also poses the risk of toxic materials leaching from the panels themselves into ground water and aquifers. Solar panels are coated with PFAS, which can leech into the

ground water and aquifers. Underground plastic ducting and cabling also poses the risk of leaching PFAS and PFOS into ground water and aquifers. Fire-suppressant foams also pose a risk of contaminating drinking water supplies.

If water quality is damaged, homes and businesses will entirely lose their only potable water supplies. This is a significant risk to human health and should be scoped in.

Effectiveness of Environmental Mitigation should be scoped in

Mitigation proposals should be created for all endangered species recorded at all sites, both in desk-based and on-site surveys. Peer-reviewed evidence should be supplied that proposed mitigations are effective How will they address levels of uncertainty? How will they meet the costs of ongoing monitoring and data collection to check mitigation is effective? How will they address issues of ineffective mitigation? How will they Guarantee that measures proposed as mitigation to address the environmental impacts development are implemented as originally proposed? How will mitigation measures be enforced? How will funds be attached for this purpose to the project if the shell company dissolves?

Contamination/damage to soil should be scoped in

EPS state: 'The land within the Scheme will be restored and returned to its original use as far as reasonably practicable after decommissioning. This will include removal of the solar PV panels, substations, conversion units and BESS.'

As this is BMV agricultural land, it should be guaranteed that the land should be returned as agricultural land of the same or better quality at decommissioning. This is supposedly the reason these schemes and land use can be categories as 'agricultural' rather than industrial - that they improve soil quality and biodiversity, not permanently damage good agricultural land.

Compression, contamination estimates during construction and decommissioning for each site and specific equipment to be installed on that site should be provided.

Site/soil specific depth of compression at each site should be provided. Evidence from other sites with that specific type of equipment/soil.

Modelling of time for soil to recover from compression should be provided.

Modelling of long-term impacts to different grades of BMV soil should be provided.

Modelling and evidence of time for soil to recover homogeneity after decommissioning should be provided.

Length of time for soil to return to previous agricultural grade after decommissioning should be provided. Guarantee of return of soil to at least previous BMV grade should be provided.

Quantity, locations and contamination impact of cement/concrete on soil should be provided.

Risk assessment of developing site with historic PFAS contamination (*e.g.* on and adjacent to the three former RAF airbases: Tibenham, Seething and Hardwick).

Materials of metal mountings, method and depth of installation, leaching/weathering impacts on soil should be provided for each specific site.

Leaching reports for all equipment/materials to be installed should be provided.

Contamination implications of weathering, microcracking and damage to panels on soil contamination should be provided.

Weathering and deterioration impacts of other equipment on soil should be provided.

Estimates of breakage of panels on transit and installation should be provided.

Breakage of panels due to weather events- storms, hail, debris falling on to panels, bird strikes should be addressed

PFOS/PFAS from underground cables. Long term impacts of leaving them in the soil should be addressed

Continuing soil monitoring should be undertaken and a plan and funding provided.

Impact of silt at each site should be assessed.

Modelling of soil contaminants from site, specifically lead and PFAS, on future crop growth on those sites, and also surrounding agricultural land should be assessed

Impact on the soil beneath the panels if the minimum height is 0.4m. Sheep will be unable to graze beneath panels, how will the soil therefore regenerate? There will not be improvements to soil quality on these areas.

'New internal access tracks are likely to be a maximum of 6m wide, constructed of hardcore or gravel over a levelling layer of substrate.' How do they propose to decontaminate this land and return it to agricultural use?

There is insufficient consideration for building new roads on sites capable of carrying and turning articulated lorries and storage of materials. Also, there is an unrealistic understanding of the potential for access from minor country roads without damaging verges. For example, Fairstead Lane (access to site 7) is too narrow to carry vehicles of the dimensions they specify.

Ground conditions should be scoped in

Given the highly likely existence of unexploded ordnance on both sites 3a and 3b (3b was the former heavy bomb dump for RAF Hardwick) and site 10, and the acknowledged contamination risks of all three former RAF airbase sites, ground conditions should be scoped in. It has recently come to light that there is significant PFAS contamination associated with the soils and ground water of former RAF bases,[32] with residents who have been using private water supplies associated with those sites requiring blood-letting to reduce the PFAS concentrations in their blood.[33] The PFAS contamination is associated with firefighting foams, which were used at Airforce bases.

Since the East Pye Solar Scheme adjoins three former RAF bases at Seething, Hardwick and Tibenham, it is important to fully assess the baseline levels of ground and water contamination from PFAS in these areas. It is also important to assess the likelihood of releasing any kind of historic contaminants into the soil by pile driving 4m below the plough line. The implications for underlying aquifers also need to be assessed.

There should also be an assessment of the impact of PFAS coatings and backings from the solar panels adding to this contamination. The long-term implications for these agricultural sites, surrounding areas and any future crop growth should be fully assessed.

Environmental

NPS EN-5 'Environmental and Biodiversity Net Gain' section 2.5 has not been followed. Biodiversity Net Gain (BNG) is an approach that aims to leave the natural environment in a better state than it was before. The BNG process requires developers to plan into their project increases in natural habitats and ecological features.

EN-1 This ES has not addressed assessment principles and generic impacts and should be rewritten.

Insufficient research has been carried out on biodiversity and the impacts of utility-scale solar.

Mitigation measures must be specific and aligned to identify all of the Environmental and biodiversity losses.

Given that agricultural land is inherently low biodiversity score, net gain would be better measured against existing field margin biodiversity scores, as these are directly comparable. A more relevant aspect would be to assess current vs predicted future Natural Capital values for all sites.

[32] 'Forever chemical' hotspots revealed to include RAF bases and airports | The Independent
[33] Bloodletting recommended for Jersey residents after PFAS contamination | Jersey | The Guardian

Environmental impact to common species should be scoped in



Due to the scale of this scheme across such a large expanse of the landscape, its impact on common wildlife should also be scoped in.

This is an area of ancient woodland with herds of red, roe and muntjac deer. It is a core woodland area and part of the UK Woodland Network for Biodiversity, which aims to allow the free migration of species across the landscape to enable genetic diversity. The impact of this extent of deer-fencing on the landscape and especially on deer and hares should be scoped in. Impact on common animals' ability to freely cross the landscape, mate and feed should be scoped in. With a project covering this extent of the landscape there is a significant concern that wildlife will be forced on to roads.

EPS states: 'Applicants should aim to minimise the use and height of security fencing. Where possible applicants should use existing features, such as hedges or landscaping.'[34] This is currently being ignored and should be enforced. Indeed, ancient hedges have removed crossing Plot 9 in contravention of the Defra hedgerow regulations during the bird nesting season in March 2024



The impact of this scheme across the whole ecosystem should be properly quantified.

Wintering/Passerine birds should be scoped in

Several of the proposed land parcels are currently in the Countryside Stewardship Scheme for the protection of farm assemblage birds, specifically Lapwing. There is no current effective mitigation for lapwing, which are a ground nesting species. The impact of this scheme to passerine birds should be scoped in, as it will have significant effects on them.

Otters should be scoped in

The area is within three miles of the Broads Authority and has tributaries of the river Yare. It is therefore likely that otters may be present in the areas impacted by the scheme. Otters have been observed in the Meres in Brooke, less than 1 km from the proposed Plot 9.

[34] 2.10.132

Impacts of any lighting, including temporary lighting on wildlife and communities should be scoped in

‘3.8.5 Temporary on-site lighting will be required during construction to enable safe working in hours of darkness’. The proposed working hours are between 7am and 6pm weekdays and Saturday mornings. In winter it is dark until 8am and after 4pm. There will be at least three hours of artificial lighting five days per week during the winter months. Many of the proposed sites are adjacent to woodland or locations with significant bat and owl populations. The impacts of temporary lighting of this scale on wildlife should be scoped in, especially at the specific times as these are when both bat and barn owl activity is greatest

This is an area with no streetlighting. The impact of any form of night-time artificial lighting on residents and their homes should also be scoped in.

Impacts of permanent motion-sensor lighting on wildlife and communities should be scoped in

‘Motion sensing security lighting will be provided within the Substations, ancillary infrastructure and within the BESS for security and maintenance purposes, during hours of darkness.’
There is recorded barbastelle bat activity around the proposed BESS site. The impact of permanent motion-sensor lighting on the ability of creatures to rest, breed or feed should be scoped into the assessment.

Impact of decommissioning on any Biodiversity Net Gain should be scoped in

The impact of decommissioning and return to agriculture on any BNG gain during operation should be scoped in. Will any biodiversity net gain remain after decommissioning?

Water and Flooding should be scoped in

Private water supplies and drinking water should be scoped in

EPS must gather data on the number, types and locations of all private water supplies within 1KM of every proposed site or cable corridor.

EPS says at 5.3.7 ‘The Site and CRC are not located within any Drinking Water Protected Areas (surface water) or Drinking Water Safeguard Zones (both surface and groundwaters), with the exception of sub-Site 3A which is covered by a Drinking Water Safeguard Zone for surface water.’ This is incorrect even by their own assessment which also identifies drinking water safeguard zones at site 1.

EPS identifies Impact pathways during the construction, operational and decommissioning phases to include the following:

- impacts on water quality from sediment/pollutant mobilisation, contamination from potential harmful materials (e.g. lead, lithium and other heavy metals) from solar panels/batteries during construction and decommissioning.
- impacts on local water supplies/groundwater from spills during construction and decommissioning; and
- impacts on water quantity/surface water runoff from increases in impermeable areas during operation

The EPS document says: 'potentially contaminated soils (if present) may be disturbed during the construction and decommissioning phases as a result of construction and decommissioning works, and during the operational phase as a result of in-ground maintenance works. Such disturbance could impact human health.' This will have an impact on private drinking water supplies and also drinking water for farm animals and wildlife.

EPS say mountings are to be driven up to 4m into the ground – impact on aquifers should be scoped in.

Leaching impact of specific proposed equipment on ground water should be scoped in.

Damage, microcracking, leaching impact of equipment on drinking water quality.

Impact on drinking water protection zones of concrete, PFAS, galvanised metal and other toxins from panels.[35]

Impact of altered run-off and silt on specific nearby wells and boreholes, pumps and filtering equipment

Continuous monitoring of potential contamination of drinking water. This is a significant public health issue. Contamination of concrete and plastic-coated cables in perpetuity on ground water, aquifers and drinking water supply. Particularly implications of PFAS solar panel backings and coatings - 'the asbestos of the future'[36] (International Society for Chemistry).



Flooding should be scoped in

'5.3.21 In summary, the Site and CRC are considered to have a 'Very Low' to 'Low' flood risk from all sources.' The flooding information provided is incorrect, as evidenced by the photograph of Long Stratton to the right. There were significant floods across the whole site in 2020 and 2023, during which

[35] rsc-policy-position-on-pfas-in-uk-drinking-water.pdf

[36] PFAS: The New Asbestos? - Environmental Law - United Kingdom Insurance Risks from PFAS - Per- and Polyfluoroalkyl Substances - Hannover Re

times many of the major access routes EPS plan to use were impassible in multiple locations.[37] December 2024 Fairstead Lane was flooded and impassible.

Impact of run-off particularly on areas already prone to flooding should be scoped in. It should also be scoped in for areas on slopes, such as site 8 in Shotesham, and assessments of impact made during all part of the year due to varying ground conditions.

Arboriculture should be scoped in

This is an area with a significant number of ancient hedgerows and trees of significance. They provide an important resource and habitat for wildlife. Unfortunately, we have already witnessed (photographic evidence) of landowners grubbing up ancient hedgerows last March during nesting season in advance of the environmental assessments for this project. We also have evidence of large numbers of hedgerows this winter being cut down to below a meter in height in advance of environmental surveys, notably bird surveys that would have been severely downgraded by this illegal activity

Due to the massive impact on the landscape of the cable corridors and associated infrastructure, there should be full surveys and impact assessments of all hedgerows and trees in all cable corridors and every site.

It is not acceptable to replace mature hedging and trees with new planting as mitigation.

Details of vegetation management plan including pesticide spraying and their impacts should be scoped in.

All socio-economic impacts should be scoped in

Section 5.11 East Pye Solar has explicitly stated that this project will bring no benefit to impacted residents, their communities or the people of Norfolk, either in terms of skills, employment, amenity nor even electricity. The only people benefitting are the handful of individual farmers involved in the scheme.

Employment and income should be scoped in

Impacts to tourism and businesses have been completely ignored.[38]

[37] PICTURES: Firefighters called to numerous flooding incidents in and around Diss
Norfolk fire service declare flash floods a 'major incident' - BBC News
Major roads in Norfolk underwater after heavy downpours | Eastern Daily Press

[38] East Pye Solar EIA Scoping document, Table 5.8

EPS have already been informed that there are businesses directly impacted by this scheme that would be unviable to open, either during the construction or decommissioning phases as well as made potentially permanently unviable due to the siting of this project and its impact on tourism. As we are only two miles from the Broads National Park and also close to the coast, we have a thriving tourist industry in South Norfolk, with many people coming to stay in holiday lets and Airbnb for weekend breaks or summer holidays.

East Pye Solar have not provided any lists of local businesses impacted in their scoping report other than Norfolk Gliding Club. Loss of employment and income for those who own holiday lets, Airbnb properties, who run events, own farm shops or restaurants is a significant factor of this project and should be scoped in. East Pye Solar are familiar with impact statements from our residents, including this one published in the national press:

'Roy and Heidi Martin have spent the last three years converting their disused barn into two immaculate holiday lets overlooking fields that will be filled with panels. Roy believes their business will be completely unviable. "People come here for a quiet retreat. It's the last thing they are going to want," he says. "I've put everything into this – my life savings, two years of every penny I could earn, and what are we going to be left with?" he says.'[39]

Socio-economic impacts should also be assessed as a cumulative impact in light of the other proposed solar projects locally. The permanent impact to tourism businesses should also be assessed if all proposed solar projects in the area go ahead and the landscape is industrialised for the next 60 years.

Construction activities are likely to be carried out Monday to Friday 07:00-18:00 and between 08:00 and 13:30 on Saturdays, which means there will be a significant impact on restaurants, tourism and holiday lets, preventing some from being able to trade at all due to construction disturbance, noise and vibration.

Economic impact to homeowners should be scoped in

There should also be an assessment of the impact to homeowners' abilities to continue to insure their properties and any increase to insurance premiums as a result of being sited near to BESS infrastructure, substations or areas where there is likely to be any higher risk of flooding due to the scheme.

The site plan shows that the landowners and EPS have chosen to site infrastructure surrounding private homes, placed it immediately behind them, or directly in front of them. Local residents have been advised by estate agents that the most severely impacted homes have already lost 30% of their value from the time this project was announced. It is now not

[39] 'People Versus Power', *The Observer*, 29 December 2024. Solar farms v people power: the locals fighting for their county | Solar power | The Guardian

possible for homeowners to sell their homes until the project is either rejected or built and the true impact to their properties is known. Many families are threatened with being put into negative equity due to this scheme, as reported in *The Observer*:

'A local estate agent has suggested that the value of the worst-impacted houses could fall by 30%. If that happens, Chris and Jenna Humphrey will be in negative equity, their mortgage will be larger than their house's value. A 2023 peer-reviewed study found that UK house values dropped by an average of 10.2% if less than 750m south of installations greater than 10MW (properties to the south may be more affected because of panel glare), but they will be 50m away.' [40]

Others find themselves in financially ruinous situations having bought Listed Buildings from farmers involved in the scheme only to discover that they have placed solar fields directly beside them – making the properties now worth substantially less than it would cost to restore them.

Other landowners have sited hundreds of acres of industrial solar infrastructure directly in front of holiday lets making them worthless and unviable as businesses. No compensation for demonstrable Blight has been offered to any of these home or business owners. There has been no suggestion that other fields will be substituted to the scheme to avoid these severe impacts. This has had a significant impact on the mental health and wellbeing of families of the individual homeowners and that of the whole community, who witness this incompetence.

The socio-economic impacts of this scheme must absolutely be scoped in. The cumulative socio-economic impacts of the other solar NSIP schemes that also have TEC grid connections agreed in the Long Stratton/Gissing area should also be scoped in as if all were to go ahead, it would have a major impact on property prices locally and tourism businesses. It is completely wrong that family finances and security should be jeopardised by a scheme that benefits only a **foreign corporation** and a **handful of** individual **landowners**.

[40] 'People Versus Power', *The Observer*, 29 December 2024. Solar farms v people power: the locals fighting for their county | Solar power | The Guardian

Due to the proximity of homes and tourism businesses to all of the proposed sites, all aspects of noise and vibration should be scoped in **to the EIA**

11.10 Summary

11.10.1 **Table 11.11** provides a summary of the noise and vibration scope.

Table 11.11: Summary of Scope for Noise and Vibration

Discipline	Scoped In Elements	Scoped Out Elements
Noise and Vibration	Construction traffic noise Construction noise Construction vibration Operational noise from BESS, substations, inverters and transformers Operational traffic noise	Construction, operational and decommissioning traffic vibration Operational vibration Operational noise and vibration from panels Operational noise and vibration from cable route corridor Decommissioning noise Decommissioning vibration

Section specifically on BESS Site/Substation & Grid Connection Infrastructure, Sites 1A, 1B, 2A, 2B, 2C

Extracts from the EP.

2 Site Description

BESS Site & Proposed Grid Infrastructure Site

3.7 Battery Energy Storage System

2.13.1 The potential siting of the BESS Site is adjacent to sub-Site 1B, separated by Hundred Lane. The BESS Site comprises an agricultural field bordered by lines of trees and hedgerows, and a small pocket of woodland along part of its western boundary. Great Moulton is located 1.1km north, and Sneath Common is located 1.1km west.

2.13.2 The BESS Site is a total of 22ha. The BESS Site will also accommodate 400kV Substation 1. However, the infrastructure associated with the BESS and 400kV Substation 1 is unlikely to utilise this entire space in order to allow for emergency vehicle access

3.7.1 A BESS provides an important balancing service, allowing electricity generated by the panels to be stored at times of low demand, and then exported onto the system when demand increases. The BESS will therefore enhance grid reliability and resilience. The BESS will have a capacity of up to 500MW.

3.7.2 The BESS will incorporate heating, ventilation and cooling systems to ensure the efficiency of the technology. These features are integrated into the units within which they are housed. The battery system will comprise DC/AC inverters to control the charge of the batteries from either the solar PV energy output or when drawing energy from the grid

3.16.1 The components of the Scheme are anticipated to have the following approximate lifespans: Photovoltaic Panels – 25-40 years; and Batteries – 15-20 years.

3.16.2 3.16.3 It is therefore assumed, that the solar panels could require replacement up to two times and the batteries up to four times during the operation of the Scheme. The environmental implications of the replacement of the solar PV panels and BESS will be considered within the assessment of operational impacts of the Scheme in the ES. The construction phase is therefore considered as a worst-case scenario for the panel and battery replacement scenario, with any impacts likely to be much less than those reported during construction.

BESS health and safety considerations. It is our understanding that a large-scale BESS fire would not be tackled by the local fire service, instead it would be allowed to "burn out". This would require it being placed further away than 500m from any people and the recommendations as contained in Grid Scale Battery Energy Storage System planning – Guidance for FRS

The following should be scoped in

- recommendations as contained in Grid Scale Battery Energy Storage System planning – Guidance for FRS
- Emission modelling should take account of foreseeable scenarios, including thermal runaways in single and multiple containers.
- Means to retain and treat the large volume of water required to contain a thermal runaway should be secured in the DCO
- Degradation of water in the case of significant Incidents in the case of a Battery Fire.

NPS EN-5 'Environmental and Biodiversity Net Gain' Section 2.5, has not been followed.

EN-1 This ES has not addressed Assessment Principles and Generic Impacts and should be rewritten.

2.14.1 The proposed National Grid Substation is proposed to be located at the National Grid Substation Site (see Figure 1.2 Sheet 13 of 13). This section of the report describes the site characteristics of the National Grid Substation Site. Subject to on-going discussions with National Grid, an alternative location for the Substation, is potentially within part of sub-Site 1B (the characteristics of sub-Site 1B are described below) (shown on Figure 1.2). The potential for the National Grid Substation to be located at the National Grid Substation Site and part of sub-Site 1B are both addressed in this Scoping Report.

The applicant has **not** provided any details of size or visualization of the National Grid Substation as stated in the scoping document; therefore this should be rewritten to provide comprehensive details on this National Grid Substation, including essential visualizations to

demonstrate its impact on Great Moulton Plateau, visual effects, and nearby residential areas in addition the impacts covered in NPS EN-1.

Site 2 – Alternative Location for the National Grid Substation

EP extract

2.3.1 Site 1 is 56ha in size comprising two adjacent land parcels, sub-Site 1A and sub-Site 1B immediately to the east. Site 1 is located at the southern extent of the Scheme boundary, 170m south-west of Great Moulton, and immediately to the north of the BESS Site (see Figure 1.2 Sheet 2 of 13).

2.3.2 Sub-Site 1A comprises one agricultural field and sub-Site 1B encompasses four fields. Part of sub-Site 1B has the potential to accommodate the National Grid Substation. Whilst the National Grid Substation is likely to be located at the National Grid Substation Site as discussed at Section 2.14 of this Chapter, this is subject to on-going discussions with National Grid.

2.14.1 The proposed National Grid Substation is proposed to be located at the National Grid Substation Site (see Figure 1.2 Sheet 13 of 13). This section of the report describes the site characteristics of the National Grid Substation Site. Subject to on-going discussions with National Grid, an alternative location for the Substation, is potentially within part of sub-Site 1B (the characteristics of sub-Site 1B are described above) (shown on Figure 1.2). The potential for the National Grid Substation to be located at the National Grid Substation Site and part of sub-Site 1B are both addressed in this Scoping Report.

“3.6.7-3.6.12 “**The applicant has not addressed the potential of this in any detail**, the scoping report has totally unmined the importance of this part of the scheme. There is no visualization of the components of the scheme therefore diluting the enormous impact this will have on the countryside. 34 Planning Inspectorate (2024) Nationally Significant Infrastructure Projects: Commitments Register. Available at: https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-commitments-register

“National Grid Substation and Grid Connection Infrastructure - Achieving good design. Achieving good design requires a holistic approach to deliver high quality, sustainable infrastructure that responds to place and takes account of often complex environments. Good design is not primarily about how infrastructure looks, although these considerations (the aesthetics) are important. Nationally Significant Infrastructure Projects: Advice on Good Design - GOV.UK”

3.6.11 The details of the National Grid Substation and Grid Connection Infrastructure will be refined throughout the progression of the Scheme through PEIR and EP and ongoing engagement with National Grid Electricity Transmission plc.

3.6.12 The National Grid Substation will be constructed, operated and maintained by National Grid. This is in accordance with the Electricity Act 1989 that specifies that operators should develop and maintain an efficient, coordinated, and economical electricity transmission/distribution system, and includes required specifications.

“Applicants must provide comprehensive details on this National Grid Substation, including essential visualizations to demonstrate its impact on Great Moulton Plateau, visual effects, and nearby residential areas in addition the impacts covered in NPS EN-1

5.10.23 As detailed in Chapter 3 Scheme Description, all infrastructure will be removed upon end of life with the exception of the National Grid Substation, which will remain in situ. The underground cabling can be removed from the joint bays for recycling. However, the underground cabling ducting will be decommissioned in accordance with the latest regulations and good practice prevailing at that time and are anticipated to be left in-situ.

EP Extract

7.2.3 On this basis it is considered that there is limited potential for likely significant landscape or visual effects resulting from the Scheme to occur beyond 2km from each individual Site or sub-Site boundary (including the BESS), and the CRC. This judgement has been derived from professional experience of the nature of effects of solar farm developments. It takes into account the limited height of the solar panel and BESS elements, together with site characteristics, namely the generally flat topography within the landscape surrounding the Site. The presence of field boundary vegetation and woodland blocks within and adjacent to the individual Sites serve to provide screening and restrict visibility

EN-1 sets out assessment principles and generic impacts that an ES should address, and any specific considerations for applications. This includes a reference at paragraph 4.3.20 that the SoS should have regard to the ambitions, goals and targets set out in the Government’s Environmental Improvement Plan 2023 for improving the natural environment and heritage. This includes having regard to the achievement of statutory targets set under the Environment Act 2021.

NPS EN-5 includes a section on ‘Environmental and Biodiversity Net Gain’ at Section 2.5, which states: “When planning and evaluating the proposed development’s contribution to environmental and biodiversity net gain, it will be important – for both the applicant and the Secretary of State – to supplement the generic guidance set out in EN-1 (Section 4.6) with recognition that the linear nature of electricity networks infrastructure can allow for excellent opportunities to: i. ii. reconnect important habitats via green corridors, biodiversity stepping zones, and reestablishment of appropriate hedgerows; and/or connect people to the ii. reconnect important habitats via green corridors, biodiversity stepping zones, and reestablishment of appropriate hedgerows; and/or connect people to the environment, for instance via footpaths and cycleways constructed in tandem with environmental enhancements” Section 2.9 of EN-5 concerns the relevant impacts which applicants must

provide information on in addition to those impacts covered in NPS EN-1, being: Biodiversity and Geological Conservation; Landscape and Visual Impact; Undergrounding and subsea cables, Noise and Vibration, Electric and Magnetic Fields (EMFs) and Sulphur Hexafluoride.

An Approach to Landscape Character Assessment - GOV.UK
LUC_2001_RPA_E2_Great_Moulton_Plateau”

7.3 Overview of Legislation, Policy and Guidance

Planning Policy - National Planning Policy

7.3.1 The Overarching National Policy Statement (NPS) EN-1 202388 sets out the Government's policy for delivery of major energy infrastructure and is the primary basis for decision making relating to energy projects.

NPS EN-1 Landscape and Visual and, NPS EN-3 for Renewable Energy Infrastructure[89], and NPS EN-5 For Electricity Networks Infrastructure[90],

"This is being ignored and should be enforced - Visualisations may be required to demonstrate the effects of the BESS system and Substation/National Gride Infrastructure on the landscape of the Great Moulton Plateau.

[88] Department for Energy Security & Net Zero (2023), *Overarching National Policy Statement for Energy (EN-1).* Available at: overarching-nps-for-energy-en1.pdf https://www.landscapeinstitute.org/publication/tgn-02-21-assessing-landscape-value-outside-national-designations/Accessed Nov 24 set out the Government's policy for delivery of major energy infrastructure and is the primary basis for decision making relating to energy projects.

Measures will be incorporated within the LEMP to soften and screen views of the Scheme. There are no details of this and if that's the precise it should comply with footpaths and Bridleways as well as roads.

2.10.132: "Applicants should aim to minimise the use and height of security fencing. Where possible applicants should utilise existing features, such as hedges or landscaping. This is being ignored and should be enforced

The applicant should assess the impacts on, and loss of, all trees and woodlands within the project boundary and develop mitigation measures to minimise adverse impacts and any risk of net deforestation as a result of the scheme. Mitigation may include, but is not limited to, the use of buffers to enhance resilience, improvements to connectivity, and improved woodland management."

Extracts from the EP.

11.3.4 The Overarching National Policy Statement (NPS) for Energy (EN-1)184 recognises that noise and vibration from energy development can have impacts on the quality of human life as well as on wildlife in some cases.

11.3.6 The NPS for Electricity Networks Infrastructure (EN-5)186 sets out specific considerations which apply to electricity network infrastructure. NPS EN 5 notes the

potential for high voltage transmission lines in certain conditions, substation equipment such as transformers and other voltage regulation equipment to produce noise.

11.3.7 The Noise Policy Statement for England (NPSE)187 and National Planning Policy Framework (NPPF)188 include general planning guidance on noise and introduces the principles of adverse noise effects (which should be mitigated and reduced to a minimum) and significant adverse noise effects (which should be avoided). The NPPF also notes that tranquil areas which have remained relatively undisturbed by noise, and which are prized for their recreational and amenity value should be identified and protected.

Appendix A: Personal Impact Statements received by Brooke Parish Council

The Parish Council has included representations received from people directly affected by this proposal. These are expressions of concern in the community to the proposed plans. We have arranged them into broad address categories but have excluded personal details form this report due to GDPR requirements.

High Green Gardens

1. High Green Gardens, Brooke NR15 1HY

To whom it may concern:-

I live with my husband , daughter and disabled Father -in-Law at , # High Green Gardens , Brooke NR15 1HY. We will be one of the families most directly impacted by the latest solar farm proposals. Quite frankly, we are devastated in so many ways and should this terrible proposal go ahead, our life, home, community and environment will be forever and irrevocably ruined.

Firstly, industrialisation and unregulated development of open countryside and farmland (which still currently produces crop) is absolutely wrong ! It will not solve issues, only create further issues down the line. Surely, the empty shelves during COVID just demonstrate how we need to be MORE dependent on domestic food production during times of instability in the world. Taking perfectly suitable farmland and turning into sheets of glass, metal and toxic chemicals (which will eventually damage soil and end up in landfill) is NOT the way forward for 'Green living' or for our country. I am all for investigating and implementing alternative power sources IF it is genuinely going to hugely benefit our country and the environment and not just line the pockets of the greedy and politically hungry! It should also not be done at lightning speed and without a cohesive national plan ,helping us to get the most out of our limited land with minimal casualties of both wildlife, environment , food production and homes.

The way in which the government has underhandedly and undemocratically ridden rough shod over the regular planning rules to ' wave through' such proposals, without any due process or giving a genuine voice to those who will be most affected, is just a disgrace to the idea of democracy! Many of the so called NSIPs are actually Not one big submission but a chain of smaller, greedy projects linked together in order to avoid the scrutiny of the due planning process. Our home was only given permission to be built if it complied to the rules of 'a building of architectural significance' - the proposed panels will be erected only 5m from the edge of our 'architecturally significant' property.



The proposed panels will be seen from many of the windows of our home (it is a three story. House with far reaching views) at VERY close quarters, bringing not only an horrific outlook but , glare, noise of moving panels, possible future health impacts as yet unseen with this new technology, wildlife destruction , potential harm and damage to our family and property (as seen with similar solar farms during recent storms and high winds) … the list goes on !!!

On an even more personal note, our house will become unsaleable , according to some local agents and at best , will be significantly devalued. The sale of this home was to help fund our retirement. We have worked hard all our lives to buy this home and now our future feels very frightening - this is causing both myself and my husband significant stress and we are very worried about what this will mean for our future. We discuss this daily, and it has meant that I am currently particularly depressed and tearful. My poor husband has spent years away from us striving to provide the peace and privacy that this home affords us. It all feels like we have been robbed and have no control over our own future. We even looked into development possibilities prior to purchasing the house and there was nothing flagged … probably due to the fact that there was no need for discussion with planners so this all feels very underhand and not how a democratic society should work at all.

We moved here for a quiet life in a beautiful village / country setting and this house has allowed us the space to have my disabled Father-in-law living with us. In turn he has been able to enjoy watching birds and wildlife whilst we care for him in a healthy, safe environment. We have bat boxes , bee hive , bird boxes and have been planting fruit trees and planting a garden to ensure that we are doing our part in encouraging and nurturing local wildlife and habitats.

I have asked the people of East Pye Solar to come to my home, to see for themselves just how close

this will be to our house and how unacceptable & potentially dangerous it would be but have had no visit/response to date …..

We feel that this type of decision should be scrutinised like any other planning submission and involve the very people who know and understand the local communities and environments the most ie:- Parish and County councils .

I send this hoping for fair and due consideration to our plight.

2. High Green Gardens, Brooke, NR15 1HY.

How can one person in the current Labour government decide on what happens in the beautiful rural landscape of Norfolk in the United Kingdom?

We are talking about one person in the current Labour government making a decision on 2,700 acres of unspoilt Norfolk countryside which is scattered with many towns and villages.

Norfolk is one of the most unspoilt landscapes in the United Kingdom and one person is about to make a decision on a vast area of indigenous countryside.

The decision to implement the East Pye Solar proposal for an Industrial Solar generating plant will affect Brooke and 17 other villages in rural Norfolk. The equipment planned for this monstrosity of a project will not go through any planning departments who are normally autonomous in deciding what happens within their planning areas. No. One man in the whole country will make this decision and his name will be synonymous with ruining our green and pleasant land!

We have lived in Brooke for nearly forty years and happily raised our family here. We have always taken great joy in being part of a community that maintains a way of life that is as natural as possible. Encroachment on the green belts that we pride ourselves on are already receding due to housing demands. Now we are expected to accept solar panel technology which will destroy wildlife habitats that have been in existence for millennia!

There are plenty of facts and figures issued by residents opposing this solar panel technology. Our hearts are thoroughly downcast at the thought of the people in power in the UK are allowed to act so undemocratically.

This is the start of the UK losing its renowned democratic way of life as solar panels are being forced on us by a government that has no pride in protecting and keeping its nation's natural assets. The unscrupulous ways of businessmen 'in it ONLY for the profit!' will be responsible for a 'short term answer to a long-term problem!' that will cost every person in the UK the loss of its inherent pride and glorious heritage.

High Green

1. High Green, Brooke, NR15 1HA

Personal Impact Statement on Nearby Solar Panel Installation

I am writing to express my thoughts and concerns regarding the proposed installation of solar panels near my home. I have concerns about the potential impact on my property, daily life, and the surrounding community.

One of my many concerns is the visual impact of the installation. The placement of large solar panels near my home will alter the natural landscape and affect the aesthetic appeal of the area. This HAS been shown to lower property values and change the character in the local area.

Additionally, depending on the placement, there may be concerns about glare from the panels, which could affect visibility and comfort, particularly during certain times of the day.

My main concern with this project is my son suffers from seizures and is incredibly sensitive to EMF frequencies. It will need to be proven beyond all reasonable doubt that this will not have any negative consequences for his health. This will not be possible given there are no projects of this scale or any long-term studies.

Our field is shown on the map as being unnecessarily close to the boundary of the panels. Due to Covid my twins school closed meaning they are now home educated, a large part of this takes place within the home and during the summer and winter also within the grounds/stables, so my son will be in very close proximity to the panels.

Rest assured I will be seeking legal advice around any decline in my son's health condition as a result of this project.

Another consideration is the potential effect on the local environment. The project requires clearing land, it will disrupt local wildlife and plant life. We need to preserve the natural beauty and ecosystem of the area. We have bats in our hay barn and owls within the boundary trees, these will undoubtedly be displaced

Additionally, I am concerned about any possible noise or disruption during the construction phase. Heavy machinery, increased traffic, and ongoing maintenance activities will affect my quality of life, especially if the project is long-term. My home office is outside and due to the nature of my work I have daily sensitive meetings/phone calls which will be disturbed.

2. High Green, Brooke, NR15 1HA

We wish to register our objection to the East Pyle Solar applications. We have many objections and concerns including: -

Location- what is the rationale for placing solar panels adjacent to such picturesque villages, Brooke, in particular, is almost entirely covered by a conservation area, why not place panels along motorway corridors?

Access- there are no roads suitable in the area to access the proposed fields. The main access route would probably be through high green, numerous large plant thundering past the primary school and churning up a very narrow road.

Wildlife- the field to the rear of our house has been cleared, along with a long stretch of hedgerows, there were a large number of birds and other wildlife in this area. Easy Pyle claim that the land will be used to graze sheep. I have yet to see any sheep on any solar installation along the Cambridge corridor, this is fluffy nonsense.

Noise- the solar panels and associated boxes are not silent. Latest research shows that a 74 decibel noise is emitted, totally unacceptable to those living close by.

Land- loss of good quality arable land. CPRE is actively campaigning for roof top solar for public buildings and new builds, this upsets and inconveniences no one.

While I am sure we can we can all understand and appreciate the need for alternative sources of energy, taking up huge swathes of our beautiful countryside cannot become the 'norm' as a way forward in this matter, there are far better alternative sites which impact no one, such as placing panels in already industrialised areas, on car park roofs, on all new build houses (the list could go on).

Anyone who regularly walks the public footpaths surrounding this village cannot fail to be horrified at the sheer scale of what is being proposed and what we will lose should the development be given the go ahead. It is a pity that action could not have been taken against the destruction of the well-established hedgerow along the proposed site at the back of High Green which was habitat to birds, hares, rabbits, insects and deer, removed to make way for the survey of the site I would imagine.

I will state that I strongly object to installing solar panels on any productive agricultural land, there are more appropriate sites where they can be installed without negatively impacting on food production, wildlife and the visual impact to the countryside.

3. High Green, Brooke, NR15 1JD

Re: Violation of our landscape with solar panels

I would like to protest most strongly against the ruination of the landscape around the productive farmland around Brooke and neighbouring villages with acres of solar panels.

I totally agree with all the other protesters and their pointers as to the environment and impact of the covering of thousands of acres of productive farmland and loss of habitat for many species.

This project would be a great injustice to everyone living in the south Norfolk area and would impact the area for generations to come with the destruction of the environment and landscape with something that nobody has any idea of the long term impact.

4. High Green, Brooke, NR15 1JD

My objections specifically to site 9 bordering Brooke.

Barn Owls: -

I installed a barn owl box at the end of my garden a few years ago. This nesting box faces directly over and borders the proposed solar panel site, which historically they have used as their hunting and food gathering area. The box includes a web cam so that I can monitor breeding of the owls and have multiple photos of successful breeding over the past few years. Installing solar panels and fencing will have a massive negative impact on the ability of the barn owls to breed and hunt for food and could result in early mortality by collision or starvation.

Bats: -

During the summer I witness many bats flying over my property and into the fields where the solar panels are proposed. This is a prime feeding area for the bats and any installation of panels/fencing can only have a negative impact on their natural habitat. Similar to the owls I have genuine concern that the panels/fencing will result in their demise and death, as per the owls they are a protected species under law.

Exposed Site: -

The site is very exposed and can be seen from every direction.

Site overlooked by houses on three boundaries: -

The site is overlooked by houses on three boundaries with the bulk of the houses situated on High Green in Brooke.

Land increases in elevation moving away from Brooke towards Mill Lane which would incrementally raise the height of proposed solar panels: -

The field from High Green has a natural incline from the Brooke end all the way to Mill Lane/Littlebeck Lane. This incline will make it impossible to screen the solar farm from the houss on High Green as the solar panels would progressively increase in height as they move away from the village towards Mill Lane. The land increases in height by 9M from the High Green end to Mill Lane.

Removal of mature hedge and trees in March 2024 on the proposed site, biodiversity negative!:-

There was a large mature hedge with trees running through the fields from the High Green end towards Mill Lane but unfortunately the farmer removed the hedges and screening in March 2024, destroying potential bird nesting sites and other wildlife cover in the process. Ultimately the removed hedges and trees were formed into massive piles and set on fire, hardly an act of someone who cares for the environment! I can see no logical reason as to why this work was completed and can only assume that this was to maximise potential for solar deployment with absolutely no regard for wildlife or the environment. Hence the site is already biodiversity negative and I'm sure that this destruction will have already had a negative impact on the wildlife including the barn owls and bats as previously highlighted.

Footpath:-

No matter what mitigation is put in place the footpath that runs through the proposed site will be negatively impacted.

5. High Green, Brooke, NR15 1JD

Hi, I understand you are collating feedback on the proposed East Pye development.

I think I sent you an initial email expressing concern several weeks ago and I also wrote direct to East Pye.

After a period of reflection, I am still of the belief that this is a strongly flawed proposal. Prime farming land in a leading agricultural region should be protected against loss of its ideal use. The country needs to boost agricultural output, not diminish it. There are other areas to better site solar panels.

Time has not lessened my dismay at the prospect of extensive solar fields so very close to Brooke. East Pye have stated they wish to lessen the acknowledged negative impacts of solar fields, whether this be environmental or human impact.

When I spoke with the East Pye project manager at the open meeting in Woodton. I was advised that they wished to minimise impact on homes and individuals and that this was their policy. If this is the case it is extremely difficult to understand why the large areas adjacent to the south of Brooke were selected.

When they invited land owners to put forward suggestions for fields to be used, surely there must have been some guidelines to them asking them to not choose fields in full view of and very close to several properties and businesses? Were such guidelines given? If so, why was the Brooke proposal not rejected from outset as failing to meet the stated criteria? If no such guidelines were given to the land owners, surely this was a grave error on behalf of East Pye and one that they should certainly correct.
I am very worried that the Brooke element of the development may come to pass if due attention is not given to human impact.

The prospect of lengthy disturbance of construction and the horrendous visual impact that will blight not only myself and my wife but generations to come is hugely depressing and is distressing to us.

If solar farms, against the weight of logic are deemed by government to justify their presence in farmland, at least they should ensure they put them on farmland that cannot be seen from numerous homes and blight the local population. There is enough land in this area to ensure this need not happen.

I hope the feedback you receive will eventually reach those who will make the final decisions and that they will respond in a sympathetic and caring manner.

6. High Green Brooke NR15 1AN

The proposed Photovoltaics would be located directly at the bottom of our meadow

Currently our meadow is just outside the area of flooding as recognised by the Environment Agency Flood Risk Map

Our concern is the proposed solar panels due to go there will have a surface area equal or greater than piece of land at the rear of our meadow

Also add on the factor the concrete to used to support the structural steel frames will reduce the surface area water can seep into

Therefore, when we have heavy rain there will be a greater surface area on the glass and a smaller area on the ground to take the surface water run off

Therefore, water will over a period of time will saturated the ground and will make the adjacent areas of ground constantly wet

This will mean we will not be able to use our land for grazing the horse for probably six months of the year

Also remember the soil is mainly clay and slows down permeability and will reduce the grass and will result in more perennial weeds growing

The ditch at the rear of our meadow never gets cleaned out so any clearing of same needs to be identified in a maintenance programme (every three years)

Also the movement corridors needs to be large enough to accommodate a 3.5 ton 360 digger to carry out any maintenance works.

With regards to Glint and Glare my opinion there needs to be a separate Glint an glare impact analysis for a scheme of this size and be part of any planning process

I also think technology has not been tested on this scale of solar farm and is likely to prove expensive and may never work.

7. High Green, Brooke, NR15 1JD

I am writing to express my concern at the plans for East Pye Solar Farm.

As a resident of Brooke, I consider this vast development to be completely inappropriate for the area. The plans are far too close to existing residential properties and would cause significant negative impact to the population of the area. I do not believe these effects could possibly be mitigated by any steps you may decide to take. It would clearly have a huge negative impact on the visual character of the area. Perhaps of more concern, however, is the impact on the wildlife and biodiversity in the area which includes sites of special scientific interest and is a strategic zone for several protected species.

Whilst I accept that more “green” energy is required I believe there are better “brownfield” sites that should be explored to achieve this. The infrastructure in the area is entirely unsuitable to cope with

the installation of this development and the irreversible loss of this countryside is entirely unacceptable.

I hope you will consider my objections and find alternative sites for your plans.

8. High Green, Brooke, Norfolk NR15 1JE

Whilst we have a number of concerns about the efficacy and appropriateness of large solar farms to help meet government targets for green energy, we have tried to restrict our comments here to issues that affect us directly. However, the policy of depending so heavily on PV technology, with the problems associated with lithium sourcing, handling and dependence on China and other Far Eastern countries as suppliers, plus the difficulties of recycling/repurposing.

Site 9 on the EPS plan is bordered on three sides by narrow single-track roads, not suitable for construction traffic, and already over-subscribed by local travellers and used as 'rat runs'. We chose to live in quiet South Norfolk to enjoy the tranquillity of the countryside and a development of this magnitude would surely destroy that calmness.

The solar panels are to be mounted on 15 foot frames and surrounded by security fencing, and pole-mounted CCTV cameras. Most of the proposed sites are in sparsely populated areas and we fear that they could well be targets for vandals, not only damaging some of the panels and reducing their performance but attracting undesirable elements to South Norfolk. We are confident that most residents of South Norfolk do not want to be overlooked by industrial-scale constructions. They, like we, wish to continue enjoying the countryside.

9. High Green, Brooke, NR15 1JD

To: Brooke PC Chairman, BEPS steering group

6 February 2025

Personal Impact Statement: Opposition to the Construction of Solar Farms on Adjacent Farmland

I am writing to formally express my opposition to the proposed solar farms to be constructed on the agricultural fields directly next to my property. While I fully support the transition to renewable energy, I have serious concerns about the significant negative impacts this development will have on my property, my quality of life, and the local environment.

Impact on Property Value and Marketability

First and foremost, I am deeply concerned about the impact this development will have on the value of my property. The construction of large-scale solar farms in such close proximity to my home would dramatically reduce its appeal to potential buyers. As it stands, the tranquil, rural setting is one of the primary features that attracted me to this area in the first place. The introduction of industrial

infrastructure, including solar panels and associated equipment and fencing, will diminish the aesthetic and environmental qualities that make the location desirable.

I also worry about my ability to sell the property in the future. With the changing landscape and the industrialisation of what was once peaceful farmland, I fear that buyers will be deterred from considering my home, leaving me with limited options should I need or want to relocate. The potential stigma attached to living near an industrial site will make it harder to find a buyer at a fair price.

Industrialisation of Farmland

The rural countryside is increasingly at risk of becoming over-industrialised. Turning open farmland into a solar farm is a significant step in the wrong direction. Once this land is repurposed for industrial use, it is unlikely that it will ever return to its natural state or agricultural use. This not only impacts the local farming community, but also contributes to the degradation of our countryside, turning it into a site more akin to an industrial park than the working farm landscape that has historically defined this area.

Visual Impact on the Countryside

Another pressing concern is the visual impact this project will have on the surrounding countryside. My home is located in an area prized for its natural beauty, which greatly contribute to my well-being and enjoyment of the property. The installation of vast arrays of solar panels will forever alter the character of the landscape, creating an eyesore that will overshadow the peaceful agricultural surroundings. The aesthetic damage caused by the large, mechanical appearance of solar farms will detract from the charm and peacefulness of the area for all who live here, visitors, and tourists who cherish the countryside.

In conclusion, while I recognize the importance of renewable energy initiatives, I strongly believe that this development is not appropriate for this area. The consequences for property value, the rural character of the land, and the visual landscape are too significant to overlook. I urge local authorities to consider alternative locations for the solar farm that do not negatively affect residents and the environment in this way.

Thank you for taking the time to consider my concerns.

10. High Green Brooke, NR15 1JD Personal Impact Statement.

5th February 2025

To whom it may concern,

These are not thoughts I ever had intention to share.

Word association: Impact, CRASH, that is exactly how I would describe the impact of the application for an Industrial size solar site at the bottom of our garden.

When the image of your surroundings is altered, you realise just how much of your life is invested in those surroundings.

There is security in the objects and projections of happiness that surrounds those things, like a death, your home and the memories attached to that home, once compromised, threaten everything you believed to be true of your life.

We have been in this house for 30yrs, we rented the house for a year whilst looking for something else. We couldn't find anything so my husband said, "let's buy this place, don't worry I will change it into a home you will love".

He has over the years, managed to do just that, we have created a house that we love and filled it with 30yrs of memories.

Our dog is buried here, we have had wildlife experiences that touch your soul, wild pigeons that will fly from my hand to my husband's hand and back, doves, partridges and pheasants that will eat from our hands.

One pheasant had her own Facebook page, we picked her up on the very field now proposed for solar panels, she was tiny and would not have survived the weather forecast for that night. We brought her into the house, put her into a box on the Rayburn and didn't expect her to make it through the night, but she did. We released her at 77 days old, we thought that would be it, but she came back.

She slept in our stables and finally left that autumn. She returned the following spring with one baby, the next year with five babies and the following year with incredibly, thirteen babies. This pheasant came into our house, she loved power tools (we have video evidence), she would be beside us whilst we were working on the house.

To each other, we call our house 'the sanctuary', the place to come back to, to feel safe and secure, we celebrated our wedding here.

It seems to me everything above is no more. Immediately that bubble is burst, that place is altered to become unrecognisable in your mind, your past and memories of that place are shattered, and the image of your future is altered beyond recognition.

Not least, the uncertainty and financial implications, the value of our house is intrinsically linked to our future, it gives us choices, or we thought it did. Significantly reduced value and certainly a reduced market (would you buy a house next to 150 acres of Industrial solar which will, in time be a scrapyard) throws our retirement and options into disarray.

We have become 'hostages' in our own home, the home we would eventually have moved on from to enable us to have a comfortable and self-funded retirement.

It is so shocking to the heart and mind, and it is almost unbearable.

The dream of having my own horse at home has been my goal for as long as I can remember. I am now 63yrs old and my horse is 29, we are equally lame, she is definitely greyer than me but she is at home with us.

I was hoping that my life with horses would go on beyond my beloved girl, but I cannot face the prospect of having another horse here and riding next to the destruction of our countryside by industrial solar panels.

It is desperately sad that a dream attained could be destroyed overnight by anything, when it is a lie being sold to us under the threat that we must destroy our countryside, in order to save our planet, it is just FRAUD.

The strain that humankind's excessive consumption is putting on our planet is disastrous for the environment. We all need to consume less, whether it be plastic or otherwise, by all means ask us to 'GIVE UP' something to protect the planet, but not our countryside. I don't hear a rallying call from our government for us to consume less, fly less, use less energy.

The charity, Bite Back have shown that the 10 largest food manufacturers had combined carbon emissions world-wide, that significantly exceeded those of the entire global aviation industry and indeed, the emissions of the UK as a whole!

Cover those factories, wholesale units and supermarkets with solar if you must but don't tell me there is any justification for solar panels on farmland or the open countryside.

The thought of living with the threat of this project for several years is almost intolerable, lives will be ruined.

Sharing this feels like an assault on my privacy. I felt it was necessary, to show the degree of stress, worry and hopelessness I and no doubt many other people are feeling.

I crave the quietening of my mind but fear that it will not come any time soon.

When I go through our garden to my horse, I look at the surroundings, a few words of a poem go through my mind and I weep, every day.

"I missed you quietly today, so quietly that no one noticed.

I missed you so quietly today, but I felt it so loudly".

Keir Starmer, Ed Miliband, Island Green Power, East Pye Solar, your projects and policies are causing me distress, alarm and depression, what is the procedure for reporting this incident?

Business Impacts

Brooke View Barns

Brooke View Barns in Brooke directly overlooks the proposed plot 9.

7th February 2025



My wife and I live and work on Mill Lane, Brooke. The proposed solar farm site is immediately in front of us. When you walk out of our front door, the field is literally right there!. You walk across the single lane and step onto it.

We have just spent our entire life savings, and three years of earnings, converting a disused farm building into two beautiful holiday lets that look directly onto the fields. They both have large, elevated decked areas on the edge of the lane, to make the most of the views over the farmland and beyond, onto the rest of Brooke. We even named them 'Brooke View Barns'.

These holiday lets were to form an essential part of our retirement plans. The first of the holiday lets went live at the beginning of 2024, and went very well, bringing customers from far and wide all wanting to enjoy the peace and tranquillity of a countryside location. The second holiday let went live later in 2024, and it too has proved very popular, and nearly all the guests have commented on how they enjoyed the splendid view. Our plan was to run these holiday lets into our retirement, and when they became too much work, sell up. The holiday lets would have added substantially to the value of our property, enabling us to downsize and invest the surplus for income.

This solar farm has completely ruined our retirement plans on three fronts:

1, Who would want to book a stay in property that looks directly onto a huge solar farm, that due to the 4.5m height of the panels, will be the only thing visible as far as the eye can see? (see attached illustration) **The business will be unviable**!



2, We had a professional valuation done recently on our property, with and without the solar farm. The drop in value is expected to be 30%! This completely wipes out the value of the holiday lets, and puts us back to square one, but minus our life savings and three years of earnings!

3, I believe there are 13+ properties that front or back directly onto three sides of this food producing farmland that are now unsaleable for the next several years, as no person in their right mind would buy a property with a huge solar farm in the pipeline.

Ever since we became aware of these plans, we have thought of little else. It has caused much stress, upset, tears, and bouts of depression. Our mental health has been impacted, especially my wife's, and if it continues to worsen, we will have to seek some sort of counselling for her.

Our future now looks very uncertain. We've all heard the terrible stories about people that have been conned out of their pensions. This property, and the holiday lets business, are our pension, and we are being robbed of it before our very eyes!

Date; 12th February 2025

Cadent Gas Limited
Cadent
Pilot Way
Ansty
Coventry
CV7 9JU
Cadentgas.com

Submitted via email to:eastpyesolar@planninginspectorate.gov.uk

Your Gas Network

I refer to the Planning Inspectorate email and letter dated 15th December 2024 regarding the above proposed DCO and your current consultation.

In respect of existing Cadent infrastructure, Cadent will require appropriate protection, assurance or relocation of retained apparatus including compliance with relevant standards for works which may be proposed within close proximity of its apparatus.

To date from the details and plans provided by the project, Cadent can not confirm the full extent of interaction with the DCO.k

Cadent has so far identified the following apparatus within the vicinity of the proposed works:

- Intermediate pressure (above 2 bar) gas pipelines and associated above ground and below ground equipment
- Low or Medium pressure (below 2 bar) gas pipelines and associated above and below ground equipment (as a result it is highly likely that there are also gas services and associated apparatus in the vicinity, these are not shown on plans but their presence should be anticipated and investigated further)
- Above Ground Installations

Note: No liability of any kind whatsoever is accepted by Cadent Gas Limited or their agents, servants or contractors for any error or omission.

Diversions and Protection of Apparatus:

In order to assess the impact to Cadent's apparatus and network, as a minimum we need to conduct a high level impact assessment and feasilbity study of our below 7 bar and above 7 bar network associated with the Scheme. This work can take upwards of 12 months to undertake depending on the complexity of the scheme and therefore a meeting with the Promoter to discuss the scope and requirements is recommended at the earliest opportunity.

Land & Consents Requirements

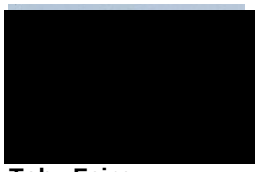
Where diversions of apparatus are required to facilitate the scheme, Cadent will require the Promoter to obtain all necessary land, planning permissions and other consents to enable the diversion works to be carried out. Details of these consents should be agreed in writing with Cadent before any applications are made to ensure that they are sufficient to deliver works within the proposed timescales. Cadent would ordinarily require a minimum of Conceptual Design study to have been carried out to establish appropriate diversion routes, land and consents requirements ahead of any application being made.

The Promoter will be responsible for obtaining at their cost and granting to Cadent the necessary land rights, on Cadent's standard terms, to allow the construction, maintenance, protection and access of the diverted apparatus. As such adequate land rights must be granted to Cadent (e.g. following the exercise of compulsory powers to acquire such rights included within the DCO) to enable works to proceed, to Cadent's satisfaction. Cadent's approval to the land rights powers included in the DCO prior to submission is strongly recommended to avoid later substantive objection to the DCO. Land rights will be required to be obtained prior to construction and commissioning of any diverted apparatus, to avoid any delays to the project's timescales. A diversion agreement may be required addressing responsibility for works, timescales, expenses and indemnity.

Protection/Protective Provisions:

Where the Promoter intends to acquire land, extinguish rights, or interfere with any of Cadent's apparatus, Cadent will require appropriate protection for retained apparatus and further discussion on the impact to its apparatus and rights including adequate Protective Provisions. Operations within Cadent's existing easement strips are not permitted without approval and any proposals for work in the vicinity for Cadent's existing apparatus will require approval by Plant Protection under the Protective Provisions. Early discussions are advised.

Yours Faithfully



Toby Feirn
Planning and Consents Manager
[redacted] @cadentgas.com;
[redacted]

PLANT PROTECTION – KEY CONSIDERATIONS

- Any works relating to the project that may have an impact on the Cadent Gas Network MUST be submitted to the Plant Protection team at Cadent (plantprotection@cadentgas.com). Details can be found here - Digging Safely - Cadent Gas Ltd, offering an on-line request, or details to contact Cadent direct by email, post or telephone. This includes all prior Ground Investigation, pre-enabling works such as Archaeological excavations, and temporary and permanent crossings of buried pipelines. The Project should be aware that even though intrusive ground works may not impact on the Cadent Gas Network crossing of buried assets to these works may need to be assessed

- Written permission is required before any works commence within a Cadent easement strip and a Deed of Consent may be required if any apparatus needs to cross the Cadent easement strip

- The below guidance is not exhaustive and all works in the vicinity of Cadent's asset shall be subject to review and approval from Cadent's plant protection team in advance of commencement of works on site.

General Notes on Pipeline Safety:

- You should be aware of the Health and Safety Executives guidance document HS(G) 47 "Avoiding Danger from Underground Services", and Cadent's specification for Safe Working in the Vicinity of Cadent High Pressure gas pipelines and associated installations - requirements for third parties CAD/SP/SSW/22. Digsafe leaflet Excavating Safely - Avoiding injury when working near gas pipes. There will be additional requirements dictated by Cadent's plant protection team.

- Cadent will also need to ensure that all pipelines remain accessible throughout and after completion of the works

- The actual depth and position must be confirmed on site by trial hole investigation under the supervision of a Cadent representative. Ground cover above our pipelines should not be reduced or increased.

- If any excavations are planned within 3 metres of Cadent High Pressure Pipeline or, within 10 metres of an AGI (Above Ground Installation), or if any embankment or dredging works are proposed then the actual position and depth of the pipeline must be established on site in the presence of a Cadent representative. A safe working method agreed prior to any work taking place in order to minimise the risk of damage and ensure the final depth of cover does not affect the integrity of the pipeline.

- Below are some examples of work types that have specific restrictions when being undertaken in the vicinity of gas assets therefore consultation with Cadent's Plant Protection team is essential:

    - Demolition

- Blasting
- Piling and boring
- Deep mining
- Surface mineral extraction
- Landfilling
- Trenchless Techniques (e.g. HDD, pipe splitting, tunnelling etc.)
- Wind turbine installation
- Solar farm installation
- Tree planting schemes

Pipeline Crossings:

- Where existing roads cannot be used, construction traffic should ONLY cross the pipeline at agreed locations.
- The pipeline shall be protected, at the crossing points, by temporary rafts constructed at ground level. The third party shall review ground conditions, vehicle types and crossing frequencies to determine the type and construction of the raft required.
- The type of raft shall be agreed with Cadent prior to installation.
- No protective measures including the installation of concrete slab protection shall be installed over or near to the Cadent pipeline without the prior permission of Cadent.
- Cadent will need to agree the material, the dimensions and method of installation of the proposed protective measure.
- The method of installation shall be confirmed through the submission of a formal written method statement from the contractor to Cadent.
- A Cadent representative shall monitor any works within close proximity to the pipeline.

New Service Crossing:

- New services may cross the pipeline at perpendicular angle to the pipeline i.e. 90 degrees.
- Where a new service is to cross over the pipeline a clearance distance of 0.6 metres between the crown of the pipeline and underside of the service should be maintained. If this cannot be achieved the service shall cross below the pipeline with a clearance distance of 0.6 metres.
- A new service should not be laid parallel within an easement strip
- A Cadent representative shall approve and supervise any new service crossing of a pipeline.
- An exposed pipeline should be suitable supported and removed prior to backfilling
- An exposed pipeline should be protected by matting and suitable timber cladding
- For pipe construction involving deep excavation (<1.5m) in the vicinity of grey iron mains, the model consultative procedure will apply therefore an integrity assessment must be conducted to confirm if diversion is required

Guidance

- To download a copy of the HSE Guidance HS(G)47, please use the following link: http://www.hse.gov.uk/pubns/books/hsg47.htm
- Essential Guidance document: Digging Safely - Cadent Gas Ltd
- SSW22 – Specification for Safe Working in the Vicinity of Cadent Assets: SSW22_vMar23_Specification-for-Safe-Working-in-the-Vicinity-of-Cadent-Assets.pdf
- Line Search Before You Dig (LSBUD) - LSBUD - Home

From:	NSIPs
To:	East Pye Solar
Cc:	NSIPs
Subject:	FW: EN0110014 East Pye Solar - EIA Scoping Notification and Consultation
Date:	16 January 2025 08:38:50
Attachments:	image001.png image002.png image003.png image004.png image005.png image007.png EN0110014 - Letter to stat cons_Scoping & Reg 11 Notification.pdf

---

You don't often get email from nsips@cambridgeshire.gov.uk. Learn why this is important

Good morning

As this falls outside of Cambridgeshire County Council's administrative boundary, we will not be looking to respond on this occasion. However, please could you keep us informed of the progress of the scheme through the NSIP process.

Please send updates to nsips@cambridgeshire.gov.uk.

Kind regards

Barbara Plumb
Consents Coordinator
Place and Sustainability
Cambridgeshire County Council
PO Box 761, ALC2660, Huntingdon, Cambs PE29 9QR

Pronouns: she/her why have I put this here?
Email: [redacted]@cambridgeshire.gov.uk
Phone: [redacted]

From: East Pye Solar <eastpyesolar@planninginspectorate.gov.uk>
Sent: 15 January 2025 15:58
Subject: EN0110014 East Pye Solar - EIA Scoping Notification and Consultation

CAUTION: This email originates outside of Cambridgeshire County Council's network. Do NOT click on links or open attachments unless you recognise the sender and know the content is safe. If you believe this email to be spam please visit the CCC Intranet and search for 'SPAM' for instructions on how to report it.

FAO Head of Planning

Dear Sir/Madam

Please see attached correspondence on the proposed East Pye Solar.

The Applicant for the Proposed Development intends to make an application for Development Consent under the Planning Act 2008. The Applicant has sought a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.

The Planning Inspectorate has identified you as a consultation body to inform the Scoping Opinion and is therefore inviting you to submit comments by 12 February 2025. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Kind regards,

Joseph Jones

Joseph Jones
EIA Advisor
The Planning Inspectorate
T 0303 444 5028

@PINSgov The Planning Inspectorate planninginspectorate.gov.uk

Ensuring **fairness**, **openness** and **impartiality** across all our services

This communication does not constitute legal advice.
Please view our Information Charter before sending information to the Planning Inspectorate.
Our Customer Privacy Notice sets out how we handle personal data in accordance with the law.

Please take a moment to review the **Planning Inspectorate's Privacy Notice** which can be accessed by clicking this link.

Please note that the contents of this email and any attachments are privileged and/or confidential and intended solely for the use of the intended recipient. If you are not the intended recipient of this email and its attachments, you must take no action based upon them, nor must you copy or show them to anyone. Please contact the sender if you believe you have received this email in error and then delete this email from your system.

Recipients should note that e-mail traffic on Planning Inspectorate systems is subject to monitoring, recording and auditing to secure the effective operation of the system and for other lawful purposes. The Planning Inspectorate has taken steps to keep this e-mail and any attachments free from viruses. It accepts no liability for any loss or damage caused as a result of any virus being passed on. It is the responsibility of the recipient to perform all necessary checks.

The statements expressed in this e-mail are personal and do not necessarily reflect the opinions or policies of the Inspectorate.

DPC:76616c646f72

Environmental advice image with text saying please consider the environment before printing this email



The information in this email could be confidential and legally privileged. It is intended solely for the addressee and they will decide who to share this email with (if appropriate). If you receive this email by mistake please notify the sender and delete it immediately. Opinions expressed are those of the individual and do not necessarily represent the opinion of Cambridgeshire County Council. All sent and received email from Cambridgeshire County Council is automatically scanned for the presence of computer viruses and security issues. Any personal data will be processed in line with the Data Protection legislation, further details at www.cambridgeshire.gov.uk/privacy Visit www.cambridgeshire.gov.uk

Planning Inspectorate
Arolygiaeth Gynllunio

Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol, BS1 6PN

Customer Services: 0303 444 5000
e-mail: eastpyesolar@planninginspectorate.gov.uk

Your Ref:

Our Ref: EN0110014

Date: 15 January 2025

Dear Sir/Madam,

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11

Application by East Pye Solar Limited (the applicant) for an Order granting Development Consent for the East Pye Solar (the proposed development)

Scoping consultation and notification of the applicant's contact details and duty to make available information to the applicant if requested

The proposed development is a Nationally Significant Infrastructure Project (NSIP), as defined in the Planning Act 2008 (as amended). A summary of the NSIP planning process can be found at the following link:

'Nationally Significant Infrastructure Projects: The stages of the NSIP process and how you can have your say'.

The proposed development is currently in the pre-application stage.

Environmental Statement (ES) and the scoping process

To meet the requirements of The EIA Regulations, applicants are required to submit an ES with an application for an order granting development consent for any NSIP likely to have a significant effect on the environment. An ES will set out the potential impacts and likely significant effects of the proposed development on the environment. Schedule 4 of The EIA Regulations sets out the general information for inclusion within an ES.

The applicant has asked the Planning Inspectorate on behalf of the Secretary of State for its written opinion (a Scoping Opinion) as to the scope, and level of detail, of the information to be provided in the ES relating to the proposed development. The applicant has set out its proposed scope of the ES in its Scoping Report which is published on the 'Find a National Infrastructure Project' website:

Before adopting a Scoping Opinion, the Planning Inspectorate must consult the relevant 'consultation bodies' defined in The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended).

The Planning Inspectorate has identified you as a consultation body which must be consulted before adopting its Scoping Opinion. The Planning Inspectorate would be grateful if you would:

- inform the Planning Inspectorate of the information you consider should be provided in the ES, or
- confirm that you do not have any comments

If you consider that you are not a consultation body as defined in The EIA Regulations please let us know.

The deadline for consultation responses is **12 February 2025**. The deadline is a statutory requirement and cannot be extended. Any consultation response received after this date will not be included within the Scoping Opinion but will be forwarded to the applicant for information and published on our website as a late response.

The Planning Inspectorate on behalf of the SoS is entitled to assume under regulation 10(11) of The EIA Regulations that you do not have any comments to make on the information to be provided in the ES, if you have not responded to this letter by the deadline above.

To support the smooth facilitation of our service, we strongly advise that any responses are issued via the email identified below rather than by post. Responses to the Planning Inspectorate should be sent by email to eastpyesolar@planninginspectorate.gov.uk.

Please note that your response will be appended to the Scoping Opinion and published on our website consistent with our openness policy.

Please also note that this consultation relates solely to the ES scoping process. Further opportunities for you to engage with and provide views on the project more generally, will arise through the applicant's own consultation. Applicants have a duty to undertake statutory consultation and are required to have regard to all responses to their statutory consultation.

Scoping Opinion

The Planning Inspectorate (on behalf of the Secretary of State) must adopt a Scoping Opinion within 42 days of receiving a scoping request. The Scoping Opinion will be published on the relevant project page of the 'Find a National Infrastructure Project' website at the end of the statutory period, or before if applicable.

The applicant must have regard to comments made within the Scoping Opinion and the ES submitted with the future application must be based on the most recently adopted Scoping Opinion.

Applicant's name and address

As the Planning Inspectorate has been notified by the applicant that it intends to prepare an ES, we are also informing you of the applicant's name and address:

East Pye Solar Limited
Unit 25.7, Coda Studios,
Fulham,
London,
SW6 6AW

Regulation 11(3) duty

You should also be aware of your duty under regulation 11(3) of The EIA Regulations, if so requested by the applicant, to make available information in your possession which is considered relevant to the preparation of the ES.

Spatial data

The applicant has provided the Planning Inspectorate with spatial data for the purpose of facilitating the identification of consultation bodies to inform a Scoping Opinion (as set out in our Advice Page 'Nationally Significant Infrastructure Projects - Advice Note Seven: Environmental Impact Assessment: process, preliminary environmental information and environmental statements', available on the gov.uk website). Requests by consultation bodies to obtain and/or use the spatial data to inform its consultation response should be made directly to the applicant using the contact details above.

If you have any queries, please do not hesitate to contact us.

Yours faithfully,

Joseph Jones

Joseph Jones
EIA Advisor
on behalf of the Secretary of State

This communication does not constitute legal advice.
Please view our Privacy Notice before sending information to the Planning Inspectorate.

Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol
BS1 6PN

Your ref: EN0110014
Our ref: East Pye Solar
Date: 12 February 2025
Please ask for: Bethany Rance
Customer Services: 03330 162 000
Direct dial: 01384 444543
Email: [redacted]@eastsuffolk.gov.uk

By email only: eastpyesolar@planninginspectorate.gov.uk

Dear Sir/Madam,

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11

Application by East Pye Solar Ltd (the Applicant) for an Order granting Development Consent for the Easte Pye Solar Project (the Proposed Development)

Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested

East Suffolk Council (ESC) welcomes the opportunity to comment on the East Pye Solar Project Scoping Report dated January 2025. This letter comprises ESC's response under Section 43(1) of the Planning Act 2008.

ESC is a neighbouring authority of the scoping area and not a host authority. ESC considers that the host authorities are best placed to provide comments on detailed technical matters within their geographical jurisdictions. For this reason, ESC has limited comments to the consideration of cumulative impacts.

Chapter 14 of the Scoping Report addresses cumulative and in-combination effects. This chapter covers both inter-project cumulative and intra-project cumulative effects. Paragraph 14.2.6 sets out the methodology for identifying the long list of projects to be considered, by using the South Norfolk Council website to identify relevant Town and Country Planning Act (1990) development, and the Planning Inspectorate website to identify Nationally Significant Infrastructure Projects (NSIPs). Paragraph 14.2.6 states NSIPs within 15km have been identified.

Table 14.2 identifies six NSIPs. Paragraph 14.2.7 states there are no other NSIPs within 15km of the Planning Inspectorate's site that are registered on the PINS National Infrastructure Planning projects portal.

It is essential that the project is not considered in isolation and that the full cumulative effects of the project with other projects and proposals is adequately and appropriately assessed, mitigated, and where appropriate compensated.

The Sizewell C project is not identified in Table 14.2. While not located within 15km of the proposed application site, it is an NSIP of significant impact and broad geographical spread in the east of England.

While many known projects have project pages on the Planning Inspectorate's website, not all do. ESC encourages the applicant to engage with the relevant local planning authorities to identify other reasonably foreseeable projects which may contribute to cumulative effects. Reasonably foreseeable projects are projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects. It is noted that the Scoping Report includes reasonably foreseeable projects within the definition of cumulative effects.

There is potential for both spatial and temporal overlap of the project's construction period with that of other NSIPs and major developments within East Suffolk but also Suffolk and Norfolk more generally, including the Sizewell C new nuclear project, multiple grid reinforcement projects, interconnectors, solar and other large-scale projects.

ESC emphasises that the impact of the project is not evaluated solely within the boundary limits nor in isolation from the wider district, particularly given the multiple consented and emerging NSIP projects in both East Suffolk and the wider county, and the likely temporal overlap between this project and other NSIPs.

If you would like to discuss any of the comments made in this response further, please do not hesitate to contact ESC using the above contact details.

Yours sincerely,

Bethany Rance | Senior Planner, MA MSc MRTPI

East Suffolk Council

Planning Inspectorate	**Our ref:**	XA/2025/100250/01-L01
By email	**Your ref:**	EN0110014
eastpyesolar@planninginspectorate.gov.uk	**Date:**	12 February 2025

Dear Sir/Madam

EIA SCOING OPINION: application by EAST PYE SOLAR LTD (the applicant) for an order granting consent for the East Pye Solar (the proposed project).-

We have reviewed the document East Pye Solar Project Environmental Impact Assessment (EIA) Scoping Report dated January 2025, and associated appendices, insofar as they relate to our remit, and would like to make the following comments.

We disagree with the conclusion set out in Chapter 5.3 to scope out the Water Environment, including hydrology, hydrogeology, flood risk, and water quality. We consider that insufficient information has been provided regarding identification of receptors, and anticipated impact pathways.

Key points are summarised here, and full details are provided in Appendix 1.

Flood Risk

- It is noted that a Flood Risk Assessment (FRA) is proposed to be appended to the EIA. We have provided further detail regarding the scope of this assessment.

Fisheries, Biodiversity and Geomorphology

- We disagree with the conclusion to scope out the water environment, and the associated ecological receptors: otter and water vole; white-clawed crayfish; invasive non-native species (INNS); aquatic invertebrates; and fish(to include the impacts of Electro Magnetic Fields (EMF) on fish.)
- The need for cable crossings and haul road crossings of watercourses are not discussed in the scoping report. The water environment must be scoped in to ensure the impacts of watercourse crossings are considered.
- The River Tas is a chalk stream priority habitat and potential impacts to this sensitive receptor should be considered.
- The site includes several main rivers, ordinary watercourses, Water Framework Directive (WFD) waterbodies and associated wetland that border or lie within the proposed order

limits. We would like to see the inclusion of watercourse biodiversity net gain (BNG) and consideration of opportunities for enhancing the water environment.

Water Resources

- We disagree with the conclusion to scope out water resources. The proposed development is located in an area of water stress where there is a significant risk that water supplies may not be available for new non-domestic demands. Sources of water supply for construction activities should be considered at the earliest possible stage.
- The potential need for dewatering, and the associated consents and discharge permits, have not been mentioned and should also be considered at the earliest possible stage.
- The potential impact on existing lawful water users including both licensed abstractions and unlicensed (private) water supplies, has not been adequately considered.

Ground water and contaminated land

- We disagree with the conclusion to scope out impacts to groundwater (and groundwater dependant terrestrial ecosystems). The report and supporting documents contain errors and incomplete data regarding the characterisation of ground conditions- including failure to identify evidence of groundwater-surface water connectivity- and this inadequate conceptual understanding risks the potential for insufficiently mitigated impacts from the proposed development on the significant and sensitive groundwater resources.
- The report fails to identify the presence of a Water Framework Directive Groundwater body underlying the site in the discussion of the Water Framework Directive setting of the site.
- The report fails to identify various potential sources of ground contamination, including an historic landfill site, contaminants associated with in-filled ground; and unknown contaminants arising from the historic airbase sites.
- The report fails to adequately consider the risks to private water supplies and their associated protected areas. There is a lack of accurate locations and associated details regarding private water supplies which should be addressed. In addition, Anglian Water should be contacted for details of assets and abstractions within the Study Area. Uncertainties regarding ground conditions means the search buffer for identification of groundwater abstractions and source protection zones is considered inadequate.
- There is a lack of detail regarding scoping of potential impacts and associated control measures in the control documents which could result in unmitigated operational impacts to surface and deep groundwaters.. Control documents should include a Foundation Works Risk Assessment or Piling Risk Assessment; and a Hydrogeological risk assessment for any HDD works. There are currently no design parameters for any HDD or deep foundation works, which may impact on shallow groundwater.

- The report fails to adequately consider the potential for buried high voltage cables to cause heat pollution of controlled waters if risks are not correctly identified and mitigated.

Yours faithfully

Liz Locke

Planning Specialist – National Infrastructure Team

Direct dial 02030251356

Direct e-mail [redacted]@environment-agency.gov.uk

Appendix 1 – Detailed comments

Detailed comments: Flood Risk

Comment Ref.	Section/Chapter	Para / Table	Comment	Recommendations.
FR1		**3.12.5**	It is noted that a Flood Risk Assessment is being prepared for the proposed development which should take into account the following :. **Sequential Test -** In accordance with National Planning Policy Framework and the sequential test (paragraph 168), development should apply a sequential, risk based approach to the location of development, taking into account all sources of flood risk and the current and future impact of climate change, to avoid (where possible) flood risk to people and property. The project should take a sequential approach where it can, if there are any opportunities for development to be located outside of flood zones 2 and 3 and into flood zone 1, this should be prioritised. **Flood Zones -** The FRA will need to consider the future flood extent of the design flood plus climate change which should be informed by the design life of the development. We would also recommend development be setback from watercourses and the design flood extent. This	

			allows for future remediation, replacement, raising of flood assets in the context of a changing climate and increasing flood risk. **Climate Change -** If the development is classed as essential infrastructure, then from a fluvial flood risk perspective the higher central climate change allowance should be used (70th percentile). A sensitivity test for the credible maximum scenario, which in this case would be the upper climate change allowance for fluvial flows (95th percentile), should also be completed. Essential infrastructure should remain operational during the design flood scenario. **Watercourse Crossings -** The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place: • on or within 8 metres of a main river (16 metres if tidal) • on or within 8 metres of a flood defence structure or culvert (16 metres if tidal) • involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert • in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission. For further guidance please visit https://www.gov.uk/guidance/flood-risk-activities-environmental-permits or contact our National Customer Contact Centre on 03702 422 549. The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity. Works affecting non-main rivers/ordinary watercourse may require the prior consent of the Lead Local Flood Authority (LLFA) under the Land Drainage Act 1991. As such, we advise consultation with the LLFA in this regard.

FR2	5.3 10 Water Environment: Flood Risk	**Section 5.3.10 Flood Map for Planning page 107**	**Issue:** This section describes how most of the site is in Flood Zone 1. This is correct although please note that there are some small ordinary watercourses which cross the site which have no associated Flood Zone mapping due to the small size of their respective catchments. For information, please note that a catchment area of 3km^2 was the de minimis in the generalised 2d modelling used to determine the extent of Flood Zone 2 and 3 where no detailed hydraulic modelling is available. **Impact:** Flood risk could be underestimated	There may be flood risk associated with watercourses which have smaller catchments, it is just not mapped or included within the Flood Map for Planning. This must be considered when assessing flood risk to the proposed site.
FR3		**Section 5.3.13 Risk of Flooding from Surface Water page 107**	This section references the Risk of Flooding from Surface Water (RoFSW) Dataset. Please be aware this dataset has recently been updated and hence the information within the scoping report may be out of date. Further information is available online at: Updates to national flood and coastal erosion risk information - GOV.UK. **Impact:** The assessment of flood risk could be inaccurate and out of date and Flood risk	Refer to the updated Risk of Flooding from Surface Water dataset when producing the Flood Risk Assessment. The updated Risk of Flooding from Surface Water dataset can be downloaded from the Defra Data Services Platform: Defra data services platform

			could be underestimated.	
FR4		**Section 5.3.29 Consultation page 109**	**Issue:** Initial enquiries have been undertaken with the Environment Agency and other risk management authorities to obtain model output data. This is welcomed. However please note that the modelling that the Environment Agency holds for the Hempnall Beck, River Tas, and Broome Beck in the vicinity of Woodton uses climate change allowances which have now been superseded. **Impact:** The assessment of flood risk could be inaccurate.	Check any modelling data you use in line with guidance on using modelling for Flood Risk Assessments available online at: Using modelling for flood risk assessments - GOV.UK.
FR5		**Section 5.3.32 Height of solar panel arrays page 110**	This section notes that the height of the solar panel arrays will be designed to be raised adequately above ground level so that any surface water can flow across the site unimpeded. This is welcomed. Please see Recommendations for further information.	With respect to the solar panels, it is apparent that some of these are in areas of flood risk associated with Main Rivers and Ordinary Watercourses. The solar panels themselves should be designed such that they sit above the 1% (1 in 100) Annual Exceedance Probability (AEP) plus higher central climate change scenario with an allowance for freeboard (300mm). The impact of the solar panel supports and other infrastructure on flood risk to third parties should be quantified within the

				Flood Risk Assessment.
FR6		**Section 8.7.2 New Watercourse Crossings page 207**	This section notes that new watercourse crossings or ditch crossings will be avoided or minimised and sensitively designed to allow continued movement of wildlife along the watercourses/ditches	We would recommend against culverts for any crossings and would prefer the use of open-span structures such as bridges. Any proposed crossings should be designed so that the soffit level of any bridges sits above the design flood level. Proposed crossings should not increase flood risk elsewhere. The design flood level for permanent crossings in this case would be the 1% (1 in 100) annual exceedance probability (AEP) plus higher central climate change scenario. For temporary crossings as part of the construction phase of the scheme the present day (without climate change) 1% (1 in 100) AEP scenario can be used. For any permanent crossings, considering a proposed design life of the development of 60 years the 2080's epoch for climate change should be used. Further details on climate change uplifts for watercourse (fluvial) flows can be found online at: Flood risk assessments: climate change allowances - GOV.UK

Detailed comments: Fisheries, Biodiversity and Geomorphology

Comment Ref.	Section/Chapter	Para / Table	Comment	Recommendations.
FBG1	Chapter 15: Conclusions	Table 15.1 – Proposed scope of the ES	**Issue:** We disagree with the conclusion to scope out the Water Environment for all phases of development. **Impact:** The redline boundary includes several main rivers, ordinary watercourses and WFD waterbodies that border or lie within the proposed order limits. The final routing of the cable corridors and haul roads have not been finalised, and will require watercourse crossings. The impacts on these watercourses cannot be determined if water environment is scoped out.	Scope in the Water Environment. Undertake a WFD assessment. MoRPh surveys/River Corridor Assessments should be completed to inform both WFD enhancements and BNG watercourse metric. Provide discussion regarding proposed methods for watercourse crossings, and scope oCEMP to include relevant environmental control documents (eg a drilling fluid breakout plan). Additional notes re. watercourse crossings are to be found below.
FBG2	Chapter 5	5.3.5-5.3.6	**Issue:** The River Tas is within the red line boundary. This is a chalk stream (priority habitat), and water quality is a key concern for this watercourse. Although the hydromorphology supports good, it is currently classified as ecologically "Poor". Any works that impact the waterbody, if not considered properly, may lead to a reduction in waterbody classification, which is prohibited under WFD regulations **Impact:** Failure to recognise the value of this priority habitat presents the risk that routine mitigation measures provide insufficient protection.	Undertake scoping for Water Framework Directive (WFD) assessment.
FBG3	Chapter 5	5.5.9	**Issue:** The risk of EMF to fish is not discussed. The Hempnall Beck (tributary of the River Tas) has records of a notable fish population	Scope in the impact on fish from EMF in the ES.

			including protected species (brown/sea trout, bullhead, European eel and brook lamprey). EMFs and fish are mentioned in National Policy Statement for Renewable Energy Infrastructure (NPS) EN-3. **Impact:** Risk of adverse impact on fish populations	Provide evidence to show that where 400kV cables are crossing the Hempnall Beck at CRC7, cables will be buried deep enough so that magnetic fields are not at levels detectable by fish.
FBG4	Chapter 8	8.5.3	**Issue:** Fish have not been included in the desk study even though the cable route corridor is proposed to cross main river. Fish are present and an impact-pathway exists for increased noise (associated with HDD) and increased runoff of fine sediment and pollution during construction. Noise from HDD is continuous noise and can have a negative behavioural impact on fish. HDD is being used to cross the Hempnall Beck at CRC7.	The desk study should include freely available EA fish population data in order to inform the EIA.
FBG5	Chapter 8	8.5.24 – Invertebrate Scoping Assessment	**Issue:** Aquatic invertebrates have not been considered and should be scoped in. There are records of the protected species Norfolk Hawker (*Aeshna isosceles*) within the scoping area, which should be considered. **Impact:** Many species of aquatic invertebrates mistake the polarised light reflected from solar panels for open water, leading them to try and lay eggs on panels, which ultimately fail.	The impacts of polarised light and mitigation approaches are discussed in 'A Review of the Impacts of Artificial Light on Invertebrates' report, which Buglife produced in 2011. Another source of information is the document 'Potential ecological impacts of ground-mounted photovoltaic solar panels' Taylor, R. et al. (2019). Provide mitigation to prevent adverse impacts on aquatic invertebrates. Eg. "*Sources of polarized light should be broken up by adding nonpolarizing patterns, areas or grids that block horizontal light. This approach, specifically using white borders and white grates has been shown to prevent insects being attracted to solar panels*". Buglife 2011

FBG6	Chapter 8	8.5.41 – Water vole and otter	**Issue:** Water vole and otter have been scoped out for construction, operation and decommissioning phases. The proposed approach - undertaking targeted surveys only if any impacts within and immediately surrounding watercourses cannot be avoided- does not cover all risk as these species are mobile and can range beyond the proposed 10m watercourse buffer. Water voles can be present in sub-optimal habitats that may not have the buffer zone applied. **Impact:** Risk of harm to protected species	Scope in: Undertake surveys to establish the presence of these species within the scoping boundary.
FBG7	Chapter 8		**Issue:** Environment Agency records show the presence of White clawed crayfish on the River Tas. This species has not been considered in the scoping report. **Impact:** Risk of harm to protected species	Surveys for this species at this scoping stage may not be required, but a commitment should be included to survey for crayfish at relevant locations when works affecting watercourse are known.
FBG8	Chapter 8	Table 8.6	**Issue:** INNS has been scoped out for all 3 phases and the avoidance, management and/or eradication of these species will be detailed within the LEMP, CEMP, OEMP and DEMP. This is not reflected in the Table of Commitments. This approach does not consider the potential to bring new INNS on to site not already present, particularly during construction and decommissioning. **Impact:** Risk of spreading invasive species across the site	
FBG9	Chapter 15	Table 15.1 Proposed scope of the ES	**Issue:** Opportunities for watercourse and wetland enhancement and BNG have not been considered.	Due to the presence of watercourses and associated wetland within the redline boundary, we would like to see the inclusion of watercourse BNG. The Environment Agency would welcome the opportunity to work with the Applicant on this matter, and we advise

				early engagement to ensure that the right biodiversity net gains are in the right places to deliver multifunctional benefits. The River Tas is a chalk stream priority habitat and a focus of EA activity, with opportunities for the Applicant to deliver ecological enhancements. BNG should be aligned with River Basin Management Plans, LNRSs, WFD objectives/mitigation measures, and Catchment Plans. Please consider using the Technical Guidance – BSI Standards Publication BS 8683:2021 – Process for designing and implementing Biodiversity Net Gain – Specification.

Detailed comments: Water Resources

Comment Ref.	Section	Para / Table	Comment	Recommendations.
WR1	Chapter 2 Chapter 5.3 Water Environment		**Issue:** We disagree with the conclusion to scope out the Water Environment for all phases of development.	Water Resources should be considered in more detail, and the following impacts be included in the EIA.
WR2	Overarching comment		**Issue:** This proposal is located in an area of water stress. Anglian Water Services (AWS), who supply the region of this development, is subject to licence reductions (caps) on its groundwater licences to manage the risk of deterioration of the associated water bodies, according to the principles set out in the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 (WFD Regulations). AWS 2024 water resources management plan (WRMP24) has set	AWS has adopted a "Non-Domestic Water Requests Policy" requiring applicants who require non-domestic water supply to complete a Water Resource Assessment to understand water demands, water efficiency measures and to effectively forecast water supply requirements. Communications around this moratorium are expected presently with AWS's most recent approach outlined in

			out that until new sustainable supplies are available, supplies to existing customers and those to supply growth will be as a result of deferring some licence changes under Regulation 19 of the Water Framework Regulations. **Impact:** Risk of lack of availability of water	their dWRMP Statement of Response (p.250, 4d V2 Final WRMP24 Statement of Response (anglianwater.co.uk)) which sets out that the company may not be able to supply all new non-domestic demands until new strategic supplies are developed. Therefore, we advise that the applicant engage in conversation with AWS to ensure that supply can be achieved for the development's needs.
WR3	Chapter 2 Chapter 5.3 Water Environment	5.3.2	Legislation Policy and Guidance includes the Water Resources Act 1991 and Water Act 2003. **Issue:** Dust suppression techniques; Bentonite clay mixing for HDD; and machinery wash down all require consumptive uses of water. The source(s) of supply for this water has not been identified. **Impact:** Risk of lack of availability of water	A Water Resources Assessment should be completed to provide an options appraisal of sources of supply of water for these activities. In the event that Anglian Water can not supply mains water, this will identify any abstraction licensing requirements under the WRA1991 and will enable the applicant to problem solve likely restrictions to water unavailability in what is a water stressed area.
WR4	5.3 - Water Environment	5.3.2	**Issue:** The assessment does not include the potential for impacts to existing lawful water users. These include both licensed abstractions and unlicensed (private) water supplies.	Licensed abstractions data can be provided by the Environment agency. Certain private and small water supplies do not require a licence to abstract water; therefore, we are not necessarily aware of their existence. The locations of private domestic sources may be held by the local authority on the register required by Regulation 14 Private Water Supplies Regulations 2016.

				The impact assessment should include the potential for derogation to occur. Abstraction licences will not be issued if they pose an impact to other abstractors.
WR5	5.3 - Water Environment		If dewatering is required, it will require an abstraction licence if it doesn't meet the criteria for exemption in *The Water Abstraction and Impounding (Exemptions) Regulations 2017 Section 5: Small scale dewatering in the course of building or engineering works*. It may also require a discharge permit if it falls outside of the *regulatory position statement for de-watering discharges*.	Consumptive abstraction from Groundwater is not available, more details can be found in the Abstraction Licensing Strategy for the catchment. If the dewatering activity can be demonstrated to be discharged to the same source of supply without intervening use (i.e. non-consumptive), this will increase the likelihood of a licence being granted.

Detailed comments: Groundwater and Contaminated Land

Comment Ref.	Section	Para/Table	Comment	Recommendations
GWCL1	Design Principles and Parameters	Table 3.1	**Issue:** No design parameters have been provided for proposed Horizontal Directional Drilling (HDD) works or foundation works for substations, BESS and other non-PV array structures. Construction of these features could result in penetration of low permeability superficial deposits and cause contamination of the underlying Principal Aquifer. There is likely connectivity between ground and surface waters beneath Hempnell Beck in the vicinity of CRC 7. Any HDD or trenched cable works used in construction in this area are likely to encounter shallow groundwater. Evidence for shallow groundwater available at desk-study phase includes the presence of springs recorded at approximate NGR TM 22502 94486 and TM 21490 94730 in OS mapping dated 1907, within 300m of CRC7 and Site 5A, indicating groundwater present at the surface. The presence of 'Spring	The applicant should provide Design Parameters for these features and demonstrate whether these are likely to encounter sensitive groundwater bodies.

			Wood', 'Spring Lane' and 'Springlane Farm' near NGR TM 24852, 91832 may also reflect the historic presence of a local spring near Sites 3A and 3B, although no spring features are noted on the OS maps provided as supporting information. 'Spring Wood' at NGR TM 28400 96000, north of CRC 9, may similarly indicate a historic spring, These may indicate the local presence of near-surface groundwater. **Impact:** Risk of creating a pollution pathway to groundwater.	
GWCL2	Site Description	2.5	**Issue:** No mention of the historic use of this area of the site as RAF Seething / United States Air Force Station 146 regarding potential land quality impacts, although this is briefly mentioned in Section 5.14.13 and shown as a potentially contaminative land use in Figure 5.1. **Impact:** Potential for contaminants to be present associated with historic land use which have not been adequately considered with respect to risk posed to groundwater.	The Scoping Report should consider risks posed to groundwater associated with historic RAF Seething / USAAF Station 146.
GWCL3	Site Description	2.5	**Issue:** Sub-Site 3A is stated to have a number of private water supplies in its vicinity, however no further information is provided on these including whether these are derived from surface water or groundwater. **Impact:** It is difficult to consider the possible impacts of the scheme upon these abstractions without sufficient information.	The Environment Agency does not hold records of private abstractions. These are usually held by the Local Authority. Where these are used for potable supply a default 50m Source Protection Zone 1 is applicable. Applicant must provide more information regarding the location and source of private water abstractions.
GWCL4	Site Description	2.5	**Issue:** The summary of superficial and bedrock geology by Site generally matches our records, however we have noted some errors and lack of detail compared with the Phase 1 LQA. Examples include inconsistent description of Lowestoft Formation lithology type (e.g. 2.3.18 and 2.4.19), and Sections 2.5.17 and	We suggest that the anticipated ground conditions should be checked for accuracy.

			2.5.18 incorrectly transpose the bedrock and superficial geology. **Impact:** Potential for the conceptual site model underpinning the Scoping Report to be flawed.	
GWCL5	Decommissioning	Section 3.17.1	Issue: The applicant states that an outline Decommissioning Environmental Management Plan (ODEMP) will be submitted as part of the DCO application however little information is provided as to its proposed content. Impact: Potential for the ODEMP to exclude mitigation measures necessary for the protection of groundwater quality and quantity.	The ODEMP should incorporate measures to prevent contamination and cross-contamination of soils, surface water and groundwater should any source of pollution be identified during decommissioning. We suggest that a Discovery Protocol should be embedded in the ODEMP, similar to the OCEMP.
GWCL6	Baseline	-	**Issue:** No reference is made in the Scoping Report to the presence of a historic landfill, 'Off West Side of Shelton Airfield Disused', which extends into CRC 5 and is described in the supporting Phase 1 GCA (Volume III Part 2 Appendix 5.2). This is however shown in Figure 5.1. **Impact:** Source of potential contamination potentially not taken into consideration in scoping.	Ensure all identified potential sources of contamination are considered as part of the scoping process, including authorised and historic landfill sites and potential areas of infilled ground / tipping.
GWCL7	Baseline – Hydrology & Hydrogeology	Section 5.3.7	**Issue:** The applicant provides a summary of Drinking Water Protected Areas (surface water) and Drinking Water Safeguard Zones (surface water) but does not provide detail on the pressures which inform these designations or consider Drinking Water Safeguard Zones for groundwater. Section 5.3.7 and Sections 2.4.23 and 2.9.30 present contradictory information regarding Drinking Water Safeguard Zone (surface water) extents. **Impact:** Potential for groundwater drinking water protection designations to have been omitted from assessment, pressures on drinking water resources which may be exacerbated by the development are not considered, and it is unclear	The applicant should confirm and consider which parts of the Scheme fall within Drinking Water Safeguard Zones for surface water, Drinking Water Safeguard Zones for groundwater, and the pressures which inform any such designated zones.

			which parts of the Scheme fall within Drinking Water Safeguard Zones or surface water.	
GWCL8	Baseline – Water Quality	Sections 5.3.22 to 5.3.30 and Phase 1 GCA Section 3.4.2	**Issue:** The applicant presents water quality information inclusive of a review of Water Framework Directive (WFD) designations. However, this does not include reference to the on-site WFD Groundwater body 'Broadland Rivers Chalk & Crag' or include discussion of Groundwater Dependent Terrestrial Environments (GWDTEs). This WFD Groundwater body is referenced in Section 3.4.2 of the Phase 1 GCA. **Impact:** The sensitivity of groundwater bodies and groundwater dependent sensitive ecological sites are not sufficiently characterised.	Assess the current designation and sensitivity of WFD Groundwater bodies and any GWDTEs present within the Study Area.
GWCL9	Topics to be Scoped Out	Sections 5.3 and 5.14	**Issue:** The Scoping Report does not discuss historic ground workings, which may be infilled, in the context of being potential sources of contamination. **Impact:** Risk to groundwater quality may be underestimated as potential sources of contamination may have been overlooked.	Include consideration of potential areas of infilled ground and incorporate measures to manage any contamination which may be present within OCEMP.
GWCL10	Ground Conditions	Section 5.14.2	**Issue:** An incomplete list of information sources used for establishing the environmental setting is provided, omitting several information sources cited in the Phase 1 GCA. **Impact:** It is unclear whether all information relating to ground conditions and environmental setting considered in the Phase 1 GCA have been taken into account for the Scoping Report.	The list of information sources presented in Scoping Report should be updated to include all relevant sources of information used, or the applicant confirms that all information collated and reviewed for the Phase 1 GCA has been considered in the assessment.
GWCL11	Baseline	5.14.14 and 5.14.15	**Issue:** The applicant has made requests for information to the Local Planning Authority and Environment Agency in support of the development. It is not indicated whether Anglian Water has been contacted with respect to their	Anglian Water should be contacted for details of assets and abstractions within the Study Area.

			assets and abstractions in the Study Area. **Impact:** Possibility that sensitive potable water abstractions and/or infrastructure have not been identified.	
GWCL12	Water Quality – Likely Significant Effects and Proposed Mitigation	5.3.34	**Issue:** The applicant provides a list of anticipated water quality and quantity impacts from the construction, operation and decommissioning phases of the Scheme, which excludes several risks we believe should be incorporated. **Impact:** Potential risk to controlled waters arising from risks that have not been considered.	The list of impacts should include: •Spills and leaks of chemicals, fuels and oils during construction, operation and decommissioning phases, •Impacts of HDD on groundwater and surface waters, e.g. loss of drilling fluids; •Impacts of heat emissions from buried HV cables on groundwater quality during the operation phase; and •Impacts on water quality from pollutants generated in the event of fire at BESS or Substation sites during the operation phase.
GWCL13	Water Quality – Likely Significant Effects and Proposed Mitigation	5.3.36	**Issue:** A surface water drainage strategy will be developed for compounds, substations, cable routes and the BESS to manage surface water runoff from impermeable areas. No detail is provided with respect to how this will manage potentially contaminated water, in particular firefighting water. **Impact**: Potential for pollution of groundwater quality arising from contaminated SW drainage if control measures are insufficient. Particularly at the BESS, National Grid Substation and Scheme Substation sites situated above SPZ 3 Principal aquifer, with SPZ 2 located within 1km.	The Surface Water Drainage Strategy and/or Surface Water Management Plan should include measures for isolation and removal of potentially contaminated runoff from BESS and Substation structures. This information should include, but not be limited to: • A detailed drainage plan which demonstrates, in the event of an emergency, that contaminated firewater can be adequately contained within the site to ensure that there is no discharge

				of polluted water to ground or surface water bodies. • The scheme should include an impermeable base or layer beneath the BESS compound and substation infrastructure, to ensure infiltration beneath the site can be controlled. • Any system for the storage of contaminated firewater should have sufficient capacity/headroom for the volumes expected in the event of a fire, even during periods of intense rainfall. The system for containing firefighting effluent should be automatic with a backup system in place in case of power failure.
GWCL14	Scoping – Water	5.3.49 / Table 5.3	**Issue:** Applicant proposes to Scope Out impacts to surface water and groundwater receptors from construction, operation and decommissioning phases in Table 5.3. The applicant provides little detail on anticipated hydrogeological regime and sensitivity across the site, and downplays the likelihood of pathways to the Principal aquifer. Examples: • The lack of detail on SPZs is a concern- much of the development is within SPZ3, with parts of the proposed National Grid Substation, CRC1 and proposed BESS Sites within 1 km of an SPZ2. • The headwaters of Broome Beck are within or close to the Seething sections of the proposed development- potential groundwater-surface water connectivity in this area in watercourses north of the village of	We do not agree with the Scoping Out of impacts to groundwater from the construction, operation or decommissioning phases due to the following concerns: • Paucity of information relating to ground conditions (in particular the anticipated thickness of low permeability superficial deposits), anticipated groundwater elevation, quality and flow and the potential for these to be affected by the Scheme; • Lack of consideration of potential impacts on shallow groundwater and potential transmission of contamination into deep groundwater in those areas of the site not underlain by

			Woodton. An informative about dewatering is provided at the end of this response. • Parts of the headwaters of Starston Brook are within Tivetshall/Ipswich Road section (NB: misspelled Ipswitch Road in the shapefiles) and CRC4-potential groundwater-surface water connectivity in this area north of the village of Pulham market. An informative about dewatering is provided at the end of this response. • There is significant potential for groundwater-surface water interaction at Hempnall Beck. Historic Environment Agency groundwater level monitoring at Morningthorpe Pit indicates the presence of groundwater at <2m below ground level close to the base of the valley of Hempnall Beck. • Hempnall Beck is referred to as Hempnall Brook in sections 5.3.17, 5.3.24 and 5.3.9. Considering it is an important watercourse directly impacted by the development consistency is important . **Impact:** Improper Scoping Out of impacts to groundwater based on inadequate conceptual understanding resulting in potential for insufficiently mitigated impacts from the proposed development.	Diamicton in the supporting Phase 1 GCA; • Lack of consideration of the possible impacts from the Scheme Substation proposed to be constructed in Site 5; • Lack of information with respect to proposed surface water drainage management at BESS and Substation sites, particularly relating to firefighting water management; and • Several potential sources of contamination identified in the Phase 1 GCA are not adequately reflected in the Scoping Report; • No consideration of WFD Groundwater bodies or GWDTEs within the Study Area in the Scoping Report; • Inadequate search area buffers with respect to groundwater impacts, particularly around the proposed Substation at Site 5; • No consideration of potential impacts from heat emissions from underground HV cables; and • Anticipated foundation depths for substation, BESS and other related infrastructure, and anticipated maximum depth of excavation and drilling for HDD crossing works are currently not available.

				The applicant should further evaluate groundwater and the relationship between groundwater and surface water bodies on the site to support the assessment. The Environment Agency may hold site specific information on the groundwater regime which can be provided on request. We recommend that the applicant submits an information request to the Environment Agency.
GWCL15	Topics to be Scoped Out	5.1.1 and Table 5.10	**Issue**: Applicant proposes to Scope Out ground conditions from assessment. As described elsewhere in this response, we do not consider the applicant has adequately demonstrated understanding of the hydrogeological setting of the Scheme and in particular the relationship between groundwater and surface water bodies. Critical to addressing this is suitable characterisation of ground conditions, which we consider to be inadequate at this stage, largely informed by a limited set of historic exploratory hole records. **Impact**: Insufficient understanding of ground conditions leading to inadequate assessment of groundwater baseline.	Ground Conditions should be Scoped In for further assessment.
GWCL16	Scoping	-	**Issue:** Heat has not been considered for assessment as a potential groundwater pollutant. **Impact:** Potential for buried high voltage cables to cause heat pollution of controlled waters if risks are not correctly identified and mitigated.	Evaluate the potential for heat impacts to occur to groundwater from underground HV cables where these interact with groundwater resources.

GWCL17	Mitigation	5.14.28 and 5.14.29	**Issue:** Best practice measures listed to be included in the OCEMP do not include a Foundation Works Risk Assessment or Piling Risk Assessment for structures involving deep /piled foundations. There is insufficient evidence and design detail at this stage to discount this risk. **Impact:** Potential for creation of contaminant migration pathways into deeper groundwater units. via piling or deep foundation works	FWRA / Piling Risk Assessments for BESS, Substation and any other structures requiring deep foundations / piling should be included in the OCEMP.
GWCL18	Mitigation	5.14.28 and 5.14.29	**Issue**: It is not stated in the Scoping Report that a hydrogeological risk assessment would be carried out for proposed HDD crossings. **Impact:** HDD or other trenchless installation methods could locally introduce drilling fluids or mobilise contamination into controlled waters if not suitably managed.	Carry out a Hydrogeological Risk Assessment where HDD or other trenchless drilling methods are required and may interact with Principal or Secondary A aquifers, or pass beneath surface watercourses or sensitive ecological receptors.
GWCL19	Impacts Scoped Out of the Assessment	Section 8.9	**Issue:** No detail is provided regarding the scope of the Operation Environmental Management Plan (OEMP). **Impact:** Omissions in the scope of the OEMP could result in unmitigated operational impacts to groundwater.	Provide further detail regarding the proposed content of the OEMP.
GWCL20	Phase 1 GCA	2.6.2 and Annex 4	**Issue:** The report shows 35 No. private water supplies within 250m of the Site, for which accurate location data and abstraction stratum information was unavailable. Approximate locations of the abstractions are shown as Annex 4 of the Phase 1 GCA report. Assuming a worst-case scenario that all private abstractions are for potable use, they would each require default 50m Source Protection Zone 1 buffers. Without accurate locations it is difficult to ascertain what parts of the site overlie these designated buffers.	Determine the locations (and where possible abstracted strata) of, and assess potential impacts to, private water abstractions and their applicable SPZ1 buffers, within potential influencing distance of the site. In the absence of further information assume a reasonable worst case in terms of spatial influence.

			Impact: Unknown risk to private water supplies.	
GWCL21	Phase 1 GCA	Table 3.3	**Issue:** Apparent error identified in summary data– Lowestoft Formation – Diamicton is indicated to range in thickness from 19.5 to 31.6m according to a review of six named BGS borehole records. We note that one of the cited records, TM18NE11, lists 'blue clay' extending to 58' (~17.7m depth) directly underlain by 'sharp sand', contradicting Table 3.3. **Impact:** Potential for other inaccuracies in the dataset used to inform the site conceptual model, potentially resulting in failure to identify significant contaminant migration pathways.	The applicant should check and confirm that the summary information used to characterise anticipated ground conditions are accurate.
GWCL22	Phase 1 GCA	3.2.11 to 3.2.17	**Issue:** There is uncertainty regarding ground conditions across the majority of the site. The ground condition summary is based on available British Geological Survey (BGS) logs, with significant data gaps across the site. This creates a risk to the high value and sensitive underlying Principal aquifer. Eg. for the BESS and National Grid Substation in Section 3.4.10 of the GCA. Section 7.4 of the supporting Phase 1 GCA states "the available ground investigation data relates only to a small proportion of the Site, therefore there is uncertainty around the actual ground conditions beneath the majority of the site, in particular those parts where sources of potential contamination have been identified". **Impact:** Risk of pollution pathways to deep groundwater resources (Principal Aquifer, SPZ 3 and private and public water abstractions) due to inadequate ground condition information.	Scope In impacts to groundwater during the Construction, Operation and Decommissioning phases as the potential for contaminant mobilisation into the bedrock Principal aquifer cannot be discounted at this time. Undertake intrusive site investigations to adequately characterise ground conditions and inform updates to the Preliminary Risk Assessment.
GWCL23	Phase 1 GCA	Section 3.4.4	**Issue**: The stated 250m search buffer is insufficient for the proposed Substation in Site 5.	Increase the search buffer for identification of groundwater abstractions and source protection

			Impact: Until design parameters are determined there remains the risk that HDD and/ or foundation construction could impact the bedrock aquifer / Secondary A aquifers. Should be 1km to be consistent with BESS & other substations	zones to 1km around all substations and BESS.
GWCL24	Phase 1 GCA	Section 5.2	**Issue**: The historic airbase sites are discussed as potential sources of contamination, but the potential for localised sources of contamination from post-war on-site disposal of aircraft is not considered. The Unexploded Ordnance (UXO) Desk Study (Annex 6 of the Phase 1 GCA) identified that the former RAF Hardwick bomb storage area was located adjacent to the north-western boundary of sub-Site 3A and within the central part of sub-Site 3B. **Impact**: Potential for the presence of contamination including radium impacted ash from authorised or ad-hoc aircraft and/or ordnance/materials disposal, particularly at margins of historic RAF sites.	The potential for authorised or unauthorised ad-hoc disposal of ordnance, aircraft or other materials should be accounted for in the assessment.

From: [redacted]
To: East Pye Solar
Subject: East Pye Solar - EIA Scoping Notification and Consultation - EN0110014
Date: 11 February 2025 12:32:49
Attachments: image001.jpg

You don't often get email from [redacted]@forestrycommission.gov.uk. Learn why this is important

Thank you for consulting the Forestry Commission on this proposal.

As a Non-Ministerial Government Department, the Forestry Commission provide no opinion supporting or objecting to an application. Rather we provide advice on the potential impact that the proposed development could have on trees and woodland including ancient woodland.

There are no Ancient Woodlands within the proposed sites. However, we note that several sites and the cable route corridor are adjacent to several Ancient Woodlands, both Ancient Semi Natural Woodlands and Plantations of Ancient Woodland Sites. Also that some veteran trees have been identified throughout the site.

Ancient Woodland:
Ancient woodlands are an irreplaceable habitat. They have great value because they have a long history of woodland cover, being continuously wooded since at least 1600AD with many features remaining undisturbed. This applies equally to Ancient Semi Natural Woodland (ASNW) and Plantations on Ancient Woodland Sites (PAWS).
Section 5.4.32 of EN-1 – The Overarching National Policy Statement for Energy states:

"*Applicants should include measures to mitigate fully the direct and indirect effects of development on ancient woodland, ancient and veteran trees or other irreplaceable habitats during both the construction and operational phases"*

Section 5.4.53 goes on to state:

"*The Secretary of State should not grant development consent for any development that would result in the loss or deterioration of any irreplaceable habitats, including ancient woodland, and ancient and veteran trees unless there are wholly exceptional reasons and a suitable compensation strategy exists"*
We would particularly refer you to further technical information set out in Natural England and Forestry Commission's Standing Advice on Ancient Woodland – plus supporting Assessment Guide and "Keepers of Time" – Ancient and Native Woodland and Trees Policy in England.

The Standing Advice states that proposals should have a buffer zone of **at least** 15m from the boundary of ancient woodlands to avoid root damage which can result in loss or deterioration of the woodland. Where assessment shows impacts are likely to extend beyond this distance, you're likely to need a larger buffer zone. For example, the effect of air pollution from development that can result from a significant increase in traffic or dust from construction.
For ancient or veteran trees (including those on the woodland boundary), the buffer zone should be **at least** 15 times larger than the diameter of the tree. The buffer zone should be 5 metres from the edge of the tree's canopy if that area is larger than 15 times the tree's diameter. This will create a minimum root protection area.
Where possible, buffer zones should contribute to wider ecological networks and be part of the green infrastructure of the area. They should consist of semi-natural habitats such as including woodland, scrub, heathland and wetland.
There is a need to consider both the direct and indirect impacts resulting from

construction.

Direct impacts can include, but are not limited to, damaging or compacting soil, damaging functional habitat connections and changing the woodland ecosystem by removing the woodland edge or thinning trees. Indirect impacts can also include reducing the amount of semi-natural habitats next to ancient woodland, increasing the amount of dust, light, air or soil pollution, changing the landscape character of the area or increasing risk of damage to property requiring tree management that could cause habitat degradation.

We would expect to see a detailed assessment of any impacts to the ancient woodland, including details of measures to be taken to reduce and mitigate any effect.

It is essential that fuels, chemicals or water materials such as topsoil, minerals or hardcore are not stored on Ancient woodland soils or under the woodland canopy. Due to the irreplaceable nature of ancient woodland and ancient and veteran trees, most temporary effects will result in irreplaceable damage.

Priority Habitat:

We note there are numerous areas of mixed deciduous woodland within the site area and adjacent to it.

Mixed Deciduous woodlands are on the National Forest Inventory and the Priority Habitat Inventory (England).

They were recognized under the UK Biodiversity Action Plan as being the most threatened, requiring conservation action. The UK Biodiversity Action Plan has now been superseded but this priority status remains under the Natural Environment & Rural Communities Act 2006. (NERC) Sect 40 "Duty to conserve and enhance biodiversity" and Sect 41 – "List of habitats and species of principle importance in England".

Section 5.11.27 of EN-1 of the Overarching National Policy Statement for Energy states:

"*Existing trees and woodlands should be retained wherever possible…….The applicant should assess the impacts on, and loss of, all trees and woodlands within the project boundary and develop mitigation measures to minimise adverse impacts and any risk of net deforestation as a result of the scheme. Mitigation may include, but is not limited to, the use of buffers to enhance resilience, improvements to connectivity and improved woodland management. Where woodland loss is unavoidable, compensation schemes will be required, and the long term management and maintenance of newly planted trees should be secured"*

Fragmentation is one of the greatest threats to mixed deciduous woodland. Woodlands can suffer loss or deterioration from nearby development through loss of connectivity, damage to soils, roots and vegetation and changes to drainage and air pollution from an increase in traffic or dust, particularly during the construction phase of a development. This is a particular concern where the woodland would become isolated in its landscape and surrounded by development on several sides or is completely surrounded by it.

For any woodland within the development boundary, land required for temporary use or land where rights are required for the diversion of utilities, the Root Protection Zone must be taken into consideration. The Root Protection Zone (as specified in British Standard 5837) is there to protect the roots of trees, which often spread out further than the tree canopy.

Protection measures include taking care not to cut tree roots (e.g., by trenching) or causing soil compaction around trees (e.g., through vehicle movements or stacking heavy equipment) or contamination from poisons (e.g., site stored fuel or chemicals) and fencing off these areas to prevent unintended incursions into the root protection zone as well as dust prevention measures to reduce any potential impact of dust pollution.

Net Deforestation and Tree Planting:

It is expected that there will be a thorough assessment of any loss of all trees within the project boundary and the development of mitigation measures to minimise any risk of net deforestation because of the scheme.

Hedgerows, individual trees and woodlands within a development site should also be considered in terms of their overall connectivity between woodlands affected by the development. Perhaps with the creation of some larger woodland blocks and hedgerow/hedgerow trees between the existing woodland blocks on site, to link them and ensure maximum gains to increase habitat connectivity, to make woodlands more resilient and to benefit biodiversity across the whole site, not solely in specific isolated areas to be used as screening. Ideally we would like to see woodland creation to be carried out in 5ha blocks or that connecting planting with existing woodlands, should create blocks of at least 5ha.

With the Government aspiration to increase tree and canopy cover to 16.5% of land area in England by 2050, The Forestry Commission is seeking to ensure that tree planting is a consideration in every development not just as compensation for loss. However, there are a number of issues that need to be considered when proposing significant planting schemes:

The species and provenance of new trees and woodland needs to be considered to ensure a resilient treescape which can cope with the full implications of a changing climate. The biosecurity of all planting stock also needs to be considered to avoid the introduction of pests and diseases, particularly in areas where there are ancient woodlands.

Plans should also be in place to ensure the long term management and maintenance of new and existing woodland, perhaps by creation of a UK Forestry Standard compliant management plan, with access also needing to be considered for future management.
We hope these comments have been useful to you. If you require any further information, please do not hesitate to contact me.

Best wishes

Sandra

Sandra Squire

Local Partnership Advisor
East & East Midlands

Tel: [redacted]
[redacted]@forestrycommission.gov.uk



Subscribe to our newsletter to be the first to hear about the latest information, advice, and news from the Forestry Commission

Disclaimer

The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorised to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

This email has been scanned for viruses and malware.

Information considered necessary to be provided in the Environmental Statement for the East Pye Solar Project

Views of Great Moulton Parish Council

The area proposed to site the East Pye Solar utility-scale power plant is a valued, tranquil and unspoilt agricultural landscape of small villages, hamlets and farmsteads with dark skies and a unique biodiversity. It has many village conservation areas and listed buildings.

Information should be provided as part of the Environmental Statement on the following criteria:

Justification for the choice of this specific location for this scale of project and evidence of exploration of alternative sites

Is the use of hundreds of acres of scattered parcels of prime agricultural land to build a 2300-acre solar farm environmentally the best solution to provide renewable energy without causing significant damage to such an extensive area of landscape? Have alternative sites been considered and evidenced as to why this a preferred option? Have brownfield sites been considered?

Have adverse impacts, including on the environment, and including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce, mitigate or compensate for any adverse impacts, been properly weighed up against potential benefits such as meeting the needs for energy infrastructure, job creation, reduction of geographical disparities, environmental enhancements, and any long-term or wider benefits.

Particularly consideration should be given to:

- Habitat loss, disturbance or fragmentation
- Disturbance, displacement, or mortality of wildlife
- Disturbance, damage or loss of protected species breeding sites, hibernation sites or resting places
- Noise and/or visual disturbance to species using the sites
- Impacts to designated sites or habitats through generation of dust or other pollutants
- Disturbance and pollution

Impact on the Broads National Park

One of the proposed sites lies only 2 miles from the Broads National Park. Broads Authority's documents state that projects planned within 3 miles of their boundaries should consult with them.

Cumulative impact

There are already multiple solar projects either in operation, or consented for construction in South Norfolk, as well as another three with grid connections agreed in the same area.

Have the cumulative effects of multiple developments been considered? Particularly with reference to the environment, particularly on ecology including common species, tourism, landscape and visual amenity, cultural heritage, transport, PRoW, noise and vibration and on human (mental) health, economic and wellbeing for all phases of the project.

Climate change adaptation

A full impact assessment of the climate altering emissions and impacts to human health and human rights should be carried out. This is not just the local population's health but its impact on all populations involved in this project's creation eg in the countries in which the panels and other equipment are manufactured. Also, the carbon footprint of the project, including global shipping and disposal of waste should be considered.

Waste and Materials

Has it been demonstrated how and where equipment including panels will be recycled at the end of its lifespan. It is particularly important to know how unrecyclable materials such as PFAS (forever chemicals) will be dealt with, and how all land will be decontaminated and returned either to its former agricultural grade or an improved grade once the project is decommissioned.

Major Accidents and Disasters

Have all risks with the inclusion and position of the BESS been carefully considered and evidenced for the BESS to ensure it is safe to local residents. It is understood that in the event of a fire within the BESS, unplanned air emissions could result in the release of Hydrogen Fluoride (HF), which may impact human receptors. The current proposed site for the BESS is upwind from Great Moulton which, if a fire did occur, could lead to total evacuation of the village.

Also, the Fire Service should be a statutory consultee on this project due to risk of fire from the BESS as the National Fire Chiefs Council for the UK has recommended minimum water requirements for fighting a BESS fire. Anglian Water should also be statutory consultees to ascertain if the infrastructure could maintain adequate water delivery rates, over a considerable amount of time, required to meet that specification. There have been a significant number of BESS fires globally. How would a fire be extinguished, given that BESS fires are currently left to burn out. The BESS should be sited significantly further away from habitation if the fire is to be left to burn. Would fire suppressants be used? If so, which? The proposed BESS site is on a drinking water protection area and river catchment protection area, there is a significant risk of PFAS pollution of both drinking water, ground water and local rivers

if there were to be a BESS fire the environmental impacts of such a disaster to local residents and wildlife, as well as soils and rivers should be provided.

Impact of potential damage to air quality from a BESS fire should also be considered and associated risks to human health.
Other major impacts such as storm damage should be evaluated, especially in light of the Storm damage to the Solar farms in the UK this winter. How would contamination to soils and ground water from toxic materials in the solar panels be averted in the result of such a storm?

Community safety is impacted by the siting of the BESS in the proposal and should be carefully considered and evidenced as being safe.

Socio-Economics

Clarification is required on the sourcing of solar panels to be used as statistics show that most are manufactured in China in plants using vast amounts of electricity generated by burning coal with the resulting carbon dioxide output being 56.6 million tonnes of CO2, which is 72% of the worlds' total emissions from solar panel manufacture. Furthermore many manufacturing plants are proven to be using slave labour provided by Uyghur refugees.

Has consideration been given to the fact that the expected life of solar panels is approximately 10 years meaning that during the life of the expected lease of 40 years they will need replacing at least three times and redundant panels will ultimately end up in landfill sites.

Has consideration been given to the impact on the surrounding populations mental health and well being as it was proven during the Covid pandemic that rural communities fared much better than urban ones.

Telecommunications, Television Reception and Utilities

Several of the proposed sites for solar panels (5, 7E and 7F and 8) are on top of the high-pressure gas pipeline that runs through Norfolk from Bacton, which is classed as a Major Hazard (MAHP). Does this not create a significant risk not only to the PV farm, but also to the surrounding area and public safety as PV farms carry an increased risk of a strike and lightning surge currents.

There are also pylons and overhead cables crossing several of the sites, that will require continued access for maintenance. It is therefore important Utilities companies are consulted.

Electric, Magnetic and Electromagnetic Fields

Evidence of assessments of electric, magnetic and electromagnetic fields should be provided, particularly in areas where overhead cables and pylons are proposed to be used, areas to be grazed by animals who are more susceptible to EMF radiation and effects on sensitive species.

Glint and Glare

Information should be provided on Glint and Glare particularly with the sites proposed along sections of the A140 and B1527 where panels will be within a road user's primary field-of-view and visible. There should be a detailed assessment of the impact of glint and glare in these locations and proposed mitigation should be modelled to test whether it would actually be effective and whether there would be any interim impacts. If screening is proposed as mitigation, then an assessment should be made on how long it would take for this to prove effective, given the proposed height of the infrastructure.

The proposed project is in an area with six active airfields, it is imperative that glint and glare should be considered where solar panels and glint and glare provides a risk to existing airfield operations which could affect flying safety and availability of land for safe emergency landing.

Public Rights of Way

A significant number of PRoW will be impacted by this scheme. It will also be unsafe to ride horses in these areas. This project will have a very significant impact on the ability of walkers and horse riders to be able to enjoy the countryside. As this project would impact so many of our PRoW, the impact of this loss of use on human health should be considered. It must be remembered how important it was during the Pandemic for people to have access to open countryside for their mental wellbeing.

Water quality or availability impacts to human health

There are a number of risks to water contamination during construction, decommission and the life of the panels. This results in a risk to human health which needs to be mitigated.

Effectiveness of Environmental Mitigation

Mitigation proposals should be created for all endangered species recorded at all sites, both in desk-based and on-site surveys. Peer-reviewed evidence should be supplied that proposed mitigations are effective and are proved effective during the life of the project.

Contamination/damage to soil

How will returned agricultural land, in its original state be measured and ensured? How will the soil quality and biodiversity of prime agricultural land be maintained or improved and not permanently damaged.

Environmental impact to common species

Due to the scale of this scheme across such a large expanse of the landscape, its impact on common wildlife should be researched fully.

This is an area of ancient woodland with herds of red, roe and muntjac deer. It is a core woodland area and part of the UK Woodland Network for Biodiversity, which aims to allow the free migration of species across the landscape to enable genetic diversity. What effect will deer-fencing have on animals' ability to freely cross the landscape, mate and feed?

The impact of this scheme across the whole ecosystem should be properly quantified.

Wintering/Passerine birds

Several of the proposed land parcels are currently in the Countryside Stewardship Scheme for the protection of farm birds, specifically lapwing. There is no current effective mitigation for lapwing, which are a ground nesting species. The impact of this scheme to passerine birds should be provided, as it is likely to have significant effects on them.

Impacts of any lighting, including temporary lighting on wildlife and communities

Many of the proposed sites are adjacent to woodland or locations with significant bat and owl populations. The impacts of temporary lighting of this scale on wildlife should be evaluated.

This is an area with no streetlighting. The impact of any form of night-time artificial lighting on residents and their homes should also be evaluated.

Impacts of permanent motion-sensor lighting on wildlife and communities

There is recorded barbastelle bat activity around the proposed BESS site. The impact of permanent motion-sensor lighting on the ability of creatures to rest, breed or feed should be assessed.

Water and Flooding

Continuous monitoring of potential contamination of drinking water would need to be carried out as it is potentially a significant public health issue.

Impact of run-off particularly on areas already prone to flooding or on slopes should be assessed including assessments of impact during all parts of the year due to varying ground conditions.

Arboriculture

This is an area with a significant number of ancient hedgerows and trees of significance. They provide an important resource and habitat for wildlife.

Due to the massive impact on the landscape of the cable corridors and associated infrastructure, there should be full surveys and impact assessments of all hedgerows and trees in all cable corridors and every site. It is not acceptable to replace mature hedging and trees with new planting as mitigation. Details of vegetation management through the life of the project should be included.

Noise and vibration

Assessments on operational noise and vibration from panels and supporting infrastructure should be provided

Chemicals, Explosives and
Microbiological Hazards
Division – Unit 4

NSIP Consultations
Land Use Planning Team
Building 1.2,
Redgrave Court,
Bootle L20 7HS

NSIP.applications@hse.gov.uk

http://www.hse.gov.uk/

For the attention of: **Joseph Jones**
The Planning Inspectorate
Operations Group 3
Temple Quay House
2 The Square
Bristol
BS1 6PN

Date: 6th February 2025

References: CM9 Ref: 4.2.1.7317.
NSIP Ref: EN0110014

Dear Joseph,

PROPOSED EAST PYE SOLAR
PROPOSAL BY EAST PYE SOLAR LIMITED
INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (as amended) REGULATIONS 10 and 11

Thank you for your email of **15th January 2025** regarding the information to be provided in an environmental statement relating to the above project. HSE does not comment on EIA Scoping Reports but the following information is likely to be useful to the applicant.

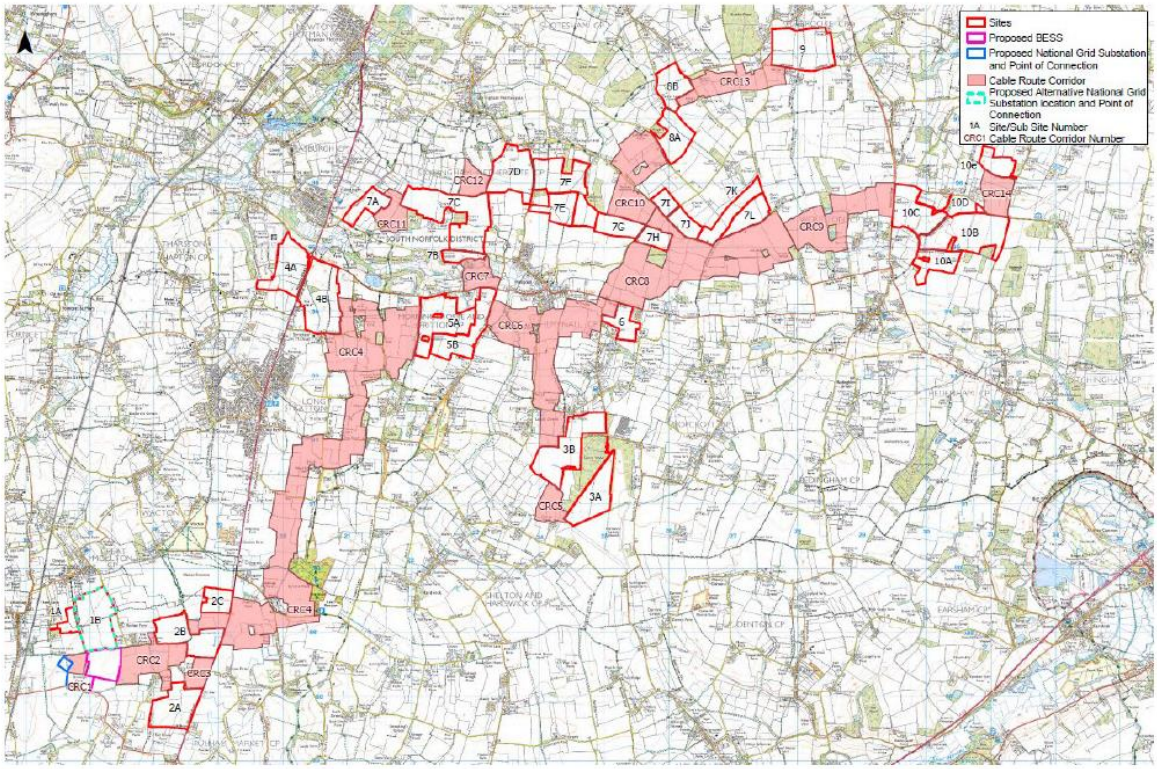
HSE's Land Use Planning Advice

Will the proposed development fall within any of HSE's consultation distances?

The proposed Easy Pye Solar Farm development consist of a number of sites and interconnecting cable corridors. The project and scope being defined by *East Pye Solar Project, Environmental Impact Assessment (EIA) Scoping Report, Date: January 2025, PINS Reference: EN0110014..*

The location drawing below was used to determine the location of the sites and corridors in relation to existing Major Accident Hazard Installations & Pipelines:

Figure 1.2 Site Layout (Overview Sheet)



It was found that that the following sites and cable corridors were in the Hazardous Substance Consent 'Consultation Zone' of the Gas Power Services Site, and the Natural Gas 5 Feeder pipeline.

Major Hazard Installation: # 3561 Gas Power Services Ltd (adjacent to Nene Valley Farm)

Postcode NR15 1EN [TM307958]

NSIP Site areas within the consultation zones: 10B, 10D, 10E

NSIP Cable corridors: CRC14

Pipeline: Natural Gas 5 Feeder Yelverton/ Diss Comp Tee

NSIP Site areas within the consultation zones: 5A, 5B, 7B, 7C, 7E, 7F

NSIP Cable Corridors within the consultation zones: : CRC4, CRC7

The applicant should contact the operators of the site **Gas Power Services Ltd (adjacent to Nene Valley Farm)** and pipeline **Natural Gas 5 Feeder Yelverton/ Diss Comp Tee** and inform them of the proposal. The Applicant should also inform the Hazardous Substance Authority **South Norfolk Council**. It is particularly important that groundworks are not started before consultation and liaison with the operator of **Natural Gas 5 Feeder Yelverton/ Diss Comp Tee.**

Explosives sites

Explosives Inspectorate has no comment to make as there are no HSE licenced explosives sites in the vicinity of the proposed development.

Electrical safety

No comment from a planning perspective

At this time, please send any further communication on this project directly to the HSE's designated e-mail account for NSIP applications at nsip.applications@hse.gov.uk. We are currently unable to accept hard copies, as our offices have limited access.

Yours faithfully,

CEMHD4
NSIP Consultation Team

From: [redacted]
To: East Pye Solar
Subject: EN0110014
Date: 08 February 2025 09:33:13
Attachments: image.png
HPC response to scoping doc re EN0110014.docx

You don't often get email from theclerk@hempnallpc.org. Learn why this is important

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11

Application by East Pye Solar Limited (the applicant) for an Order granting Development Consent for the East Pye Solar (the proposed development)

Scoping consultation and notification of the applicant's contact details and duty to make available information to the applicant if requested

We have amended one paragraph in our submission dated 07/02/25 to read -

"Lighting should be scoped in as a separate topic because most of the countryside covered by these proposals is located in an area of Rural Dark Landscape as defined in Norfolk County Council's Environmental Lighting Zones Policy. Residents and visitors alike appreciate the local rural dark landscape and dark skies. While motion sensor lighting is preferable to dusk to dawn lighting the impact of any form of night-time artificial lighting on these treasured assets, flora, fauna and residential amenity needs to be fully assessed."

A copy of the revised document is attached for your convenience.

Regards
Ian Nelson BFP FCA CF CLCA
Clerk to Hempnall Parish Council

T: 01508 498467 M: [redacted]
Now Available "Virtually" all the time at http://www.hempnallpc.org
Facebook page

image.png

We issue a newsletter quarterly which contains useful information for Hempnall parishioners. If you would like to receive a regular copy of the newsletter by email please click on this link

Please consider the environment before printing this e-mail
This communication is sent for and on behalf of Hempnall Parish Council, Karinya, Bungay Rd, Hempnall, Norwich, NR15 2NG
CONFIDENTIALITY NOTICE
This communication together with any attachments contains information which is confidential and may also be privileged. It is for the exclusive use of the intended recipient(s). If you are not the intended recipient(s), please note that any distribution, copying, or use of this communication or the information in it, is strictly prohibited. If you have received this communication in error please notify us by e-mail and then delete the e-mail and any copies of it.
A copy of our GDPR Email Privacy Policy can be found here

From:

Ian Nelson BFP FCA CF CLCA

Clerk to Hempnall Parish Council

Telephone: 01508 498467 Mobile: [redacted]

Email: theclerk@hempnallpc.org

Date: February 7th, 2025

TO:

Planning Inspectorate

Environmental Services

Operations Group

3Temple Quay House

2 The Square

Bristol, BS1 6PN

Customer Services: 0303 444 5000

E-mail: eastpyesolar@planninginspectorate.gov.uk

Your Ref: EN0110014

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11

Application by East Pye Solar Limited (the applicant) for an Order granting Development Consent for the East Pye Solar (the proposed development)

Scoping consultation and notification of the applicant's contact details and duty to make available information to the applicant if requested

Dear Sir/Madam,

In response to your letter dated 15th, January 2025 Hempnall Parish Council, a statutory consultee in regard to this proposed NSIP project, is informing the Planning Inspectorate of the information it considers should be provided in the Environmental Statement (ES).

The topics East Pye Solar propose to scope into the assessment are: Cultural Heritage; Landscape & Visual; Ecology & Biodiversity; Transport & Access; Noise; Climate Change; Soils and Agricultural Land. All of these issues should of course be scoped in and their impacts assessed.

Hempnall Parish Council is very concerned about the long list of subjects that East Pye Solar have requested to scope out of the ES namely: Air Quality; Water Environment; Major Accidents

and Disasters; Electric, Magnetic and Electromagnetic Fields; Telecommunications, Television Reception and Utilities; Wind Microclimate; Daylight, Sunlight and Overshadowing; Glint and Glare; Lighting; Minerals; Waste and Materials; Socio-Economics; Human Health; Arboriculture and Ground Conditions. A solar scheme of this magnitude will have significant impacts on all these matters and therefore all these subjects should be scoped in and fully assessed in the ES.

In particular:

Lighting should be scoped in as a separate topic because most of the countryside covered by these proposals is located in an area of Rural Dark Landscape as defined in Norfolk County Council's Environmental Lighting Zones Policy. Residents and visitors alike appreciate the local rural dark landscape and dark skies. While motion sensor lighting is preferable to dusk to dawn lighting the impact of any form of night-time artificial lighting on these treasured assets, flora, fauna and residential amenity needs to be fully assessed.

The impacts of **Glint and Glare** resulting from 2718 acres of land being covered by solar panels will be severe. The proposed development is close to airfields at Seething, Hardwick and Tibbenham and glint and glare could also affect air traffic over a wider area (e.g. Norwich Airport and the military airfields in Norfolk and Suffolk). Three busy main roads (A140, B1332 and B1527) and numerous minor roads pass through the proposed solar fields and glint and glare could certainly prove a hazard to drivers. Users of the many PROW that cross the countryside within the scheme area would also suffer considerable negative impacts on their appreciation of the rural environment as a result of glint and glare as would residents living in houses surrounded by solar fields or in houses with a view of the solar arrays. Glint and Glare must surely be scoped in for assessment.

Impacts on the **climate**, not just the **micro climate** of the area, should be scoped in. A large area of countryside covered by artificial structures will not absorb incoming short wave solar radiation in the same way as soil and vegetation surfaces and there will also be implications in regard to the transmission upwards of long wave radiation resulting from the warming of the earth's surface by the incoming solar radiation. Towns and cities produce a "heat island" effect and are measurably warmer than surrounding countryside – will mega size solar farms produce a similar result? Replacing a largely natural surface with a covering that is substantially artificial would also alter evapotranspiration rates. Evapotranspiration is the process by which water is transferred from the land to the atmosphere by evaporation from the soil and other surfaces and by transpiration from plants. Solar schemes that cover large areas of countryside will produce significant impacts in terms of the micro climate and could change the climate over a wider area. These consequences need to fully investigated and **climate and micro climate** impacts must be scoped in.

The socio – economic implications for the residents of the villages directly affected by these proposals which would transform the appearance of the countryside over a wide area that contains over 20 villages and the town of Long Stratton would be enormous. Every aspect of their lives would be impacted. Businesses reliant on tourism would suffer – the attractiveness of the area would be severely compromised and visitor numbers would decline. House values would depreciate, especially those houses alongside or surrounded by solar fields, and the enjoyment that residents currently experience through living in an area of tranquil, attractive rural landscape would be lost and not restored for at least 40 years, if ever. This is a vast subject and developers proposing mega size solar farms that would have a transformative impact on an

area must evaluate fully the socio- economic consequences of those schemes and therefore **socio – economic** impacts must be scoped in.

Closely linked to the socio-economic impacts are the consequences for the mental health and well being of local residents who will suffer if a scheme of this size is permitted. These **mental health impacts** should be scoped in for evaluation

The impact on Rural Tranquillity should be scoped in as a separate topic because most of the countryside covered by these proposals is defined on the CPRE Tranquillity Map of England as "Most Tranquil" and East Pye admit that: *"this is an undeveloped area with a valued sense of remoteness and tranquillity. It has stayed historically intact and unspoilt because it avoided the effects of the Industrial Revolution."* It is important that these few remaining untouched areas of rural England should be protected from development to preserve their integrity for future generations. The vast scale of this scheme and the distances it stretches across the landscape, some 15 KM, would have a significant impact on the area's *"valued sense of remoteness and tranquillity"* and these aspects should be scoped into the Environmental Impact Assessment.

NB Tranquillity is not just about an absence of noise it also covers an absence of artificial structures, lighting etc.

Impacts on **users of PROW** must be scoped in as an entirely separate topic. These impacts will be huge and an initial study shows that over 22km of PROW would have solar fields along one side or both sides and many more sections of footpaths would have views ruined by the presence of solar panels and the associated infrastructure.

Tracker solar panels up to 4.5m in height will transform the appearance of the landscape and together with the intrusion of security fencing, security cameras, access tracks for vehicles, inverter buildings and substations in to the local countryside will rob walkers, cyclists and horse riders of the rural experience they currently enjoy when using these PROW.

Hempnall Parish Council asks for **photomontages** to be produced for inclusion in the ES for the following locations in order to illustrate the visual impacts that users of PROW would suffer if this scheme was permitted. There are many other locations that could be chosen that would reveal similar impacts to these.

1) Grid Reference 242 958 at the junction of Saxlingham Nethergate FP10 with Hempnall FP3 and Saxlingham Nethergate FP27 looking north eastwards across meadows (Site 7F) towards Saxlingham Green (currently an open view)

2) Grid Reference 254 974 on Boudica's Way (Shotesham FP17) looking eastwards across an open field and over Market Lane towards East Pye Site 8

3) Grid Reference 272 953 on Nobbs Lane looking north eastwards across a field (East Pye Site 7L) towards Woodton Road

If further clarification of the location of these viewpoints is required if requested a representative of Hempnall Parish Council will meet a representative of East Pye on site.

In addition to requesting that the **cumulative impacts** resulting from this scheme together with other renewable projects in the wider area (both built and proposed) are scoped in Hempnall Parish Council asks that the **huge scale** of this mega solar project is scoped in as a distinct

topic so that the **combined impacts** of all the separate issues identified for inclusion in the ES, as they interact over a large area, are assessed. Evaluating each topic separately is not sufficient to identify the total impact of a scheme of this magnitude which is bound to be greater than the sum of its parts. No mega solar farm has so far been built in the UK and therefore the combined impacts of all the various elements of this kind of project (on PROW, ecology, landscape, lighting, cultural heritage etc) are not yet observable. It is essential that the ES appraises the overall level of transformative change and other consequences that would result from the construction of a huge solar energy project in tranquil rural South Norfolk.

The Environment Agency recommends: *"that solar panels and their infrastructure are not located within flood zones because there is potential for flood velocity and flood storage volumes to be affected by the panel support structures (legs and any associated bases) and any related infrastructure/buildings. Should flood velocity slow as a result of this, there is the possibility of flood water backing up and increasing flood risk elsewhere, especially upstream. Compensatory flood storage or hydraulic modelling can be required for solar farms within flood zones. There is also a risk of debris being caught up in the solar panel support structures or solar panels themselves as a result of flooding. The possibility of the solar panels becoming dislodged by flood water should also be investigated as they could pose a blockage risk downstream, especially to culverts"* Hempnall Parish Council therefore asks **that impacts resulting from flooding** and **also the potential for solar infrastructure to cause floods** are topics that are scoped in for inclusion in the ES.

It is also very important to ensure that impacts on designated **Conservation Areas** are fully assessed and this really requires conservation areas to be scoped in as distinct topic. Some really beautiful places, including Saxlingham Green, are very close to the proposed solar fields.

Hempnall Parish Council also considers that as the scheme is unlikely to be connected to the grid before the mid 2030s whether it is reasonable for the developer to attempt to justify this project on the grounds that it would make a contribution to the achievement of the government's 2030 95% Clean Power target and 2035 Net Zero target. A requirement to provide **a detailed breakdown of the timetabling of construction and grid connection should be scoped in**

Justification for the choice of **this specific location for this scale of project should also be scoped in**

A requirement for the developer to demonstrate that they have **explored reasonable alternatives should be scoped in**

The applicant should also be required to justify how this can be considered to be one NSIP project when it involves the construction of solar infrastructure at many different locations stretching over 15km from Great Moulton / Tivetshall to Brooke / Seething.

Attached to this Scoping Consultation Response is a report produced by a local Action Group (BEPS). Hempnall Parish Council recommends that it is carefully studied as it provides detailed analysis of the topics that should be scoped in and may therefore be of benefit to the Planning Inspectorate in its preparation of the written opinion as to the scope, and level of detail, of the information to be provided in the ES relating to the proposed development.

Please acknowledge safe receipt of this email- thank you.

Regards

Ian Nelson BFP FCA CF CLCA

Clerk to Hempnall Parish Council

T: 01508 498467 M: [redacted]

Now Available "Virtually" all the time at http://www.hempnallpc.org

[redacted]

We issue a newsletter quarterly which contains useful information for Hempnall parishioners. If you would like
please click on this link

ü **Please consider the environment before printing this e-mail**

This communication is sent for and on behalf of Hempnall Parish Council, Karinya, Bungay Rd, Hempnall, Norv

CONFIDENTIALITY NOTICE

This communication together with any attachments contains information which is confidential and may also b
intended recipient(s). If you are not the intended recipient(s), please note that any distribution, copying, or use
strictly prohibited. If you have received this communication in error please notify us by e-mail and then delete t

A copy of our GDPR Email Privacy Policy can be found here

From: [redacted]
To: East Pye Solar
Subject: Your Ref: EN0110014
Date: 07 February 2025 18:34:11
Attachments: image.png
East Pye Solar Project EIA Scoping Response BEPS.pdf

From:

Ian Nelson BFP FCA CF CLCA
Clerk to Hempnall Parish Council
Telephone: 01508 498467 Mobile: [redacted]
Email: theclerk@hempnallpc.org

Date: February 7th, 2025

TO:
Planning Inspectorate
Environmental Services
Operations Group
3Temple Quay House
2 The Square
Bristol, BS1 6PN

Customer Services: 0303 444 5000

E-mail: eastpyesolar@planninginspectorate.gov.uk

Your Ref: EN0110014

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11

Application by East Pye Solar Limited (the applicant) for an Order granting Development Consent for the East Pye Solar (the proposed development)

Scoping consultation and notification of the applicant's contact details and duty to make available information to the applicant if requested

Dear Sir/Madam,

In response to your letter dated 15th, January 2025 Hempnall Parish Council, a statutory consultee in regard to this proposed NSIP project, is informing the Planning Inspectorate of the information it considers should be provided in the Environmental Statement (ES).

The topics East Pye Solar propose to scope into the assessment are: Cultural Heritage; Landscape & Visual; Ecology & Biodiversity; Transport & Access; Noise; Climate Change; Soils and Agricultural Land. All of these issues should of course be scoped in and their impacts assessed.

Hempnall Parish Council is very concerned about the long list of subjects that East Pye Solar have requested to scope out of the ES namely: Air Quality; Water Environment; Major Accidents and Disasters; Electric, Magnetic and Electromagnetic Fields; Telecommunications, Television Reception and Utilities; Wind Microclimate; Daylight, Sunlight and Overshadowing; Glint and Glare; Lighting; Minerals; Waste and Materials; Socio-Economics; Human Health; Arboriculture and Ground Conditions. A solar scheme of this magnitude will have significant impacts on all these matters and therefore all these subjects should be scoped in and fully assessed in the ES.

In particular:

Lighting should be scoped in as a separate topic because most of the countryside covered by these proposals is located in an area of Rural Dark Landscape as defined in Norfolk County Council's Environmental Lighting Zones Policy. Residents and visitors alike appreciate the local rural dark landscape and dark skies. The impact of any form of night-time artificial lighting on these treasured assets, flora, fauna and residential amenity needs to be fully assessed.

The impacts of **Glint and Glare** resulting from 2718 acres of land being covered by solar panels will be severe. The proposed development is close to airfields at Seething, Hardwick and Tibbenham and glint and glare could also affect air traffic over a wider area (e.g. Norwich Airport and the military airfields in Norfolk and Suffolk). Three busy main roads (A140, B1332 and B1527) and numerous minor roads pass through the proposed solar fields and glint and glare could certainly prove a hazard to drivers. Users of the many PROW that cross the countryside within the scheme area would also suffer considerable negative impacts on their appreciation of the rural environment as a result of glint and glare as would residents living in houses surrounded by solar fields or in houses with a view of the solar arrays. Glint and Glare must surely be scoped in for assessment.

Impacts on the **climate**, not just the **micro climate** of the area, should be scoped in. A large area of countryside covered by artificial structures will not absorb incoming short wave solar radiation in the same way as soil and vegetation surfaces and there will also be implications in regard to the transmission upwards of long wave radiation resulting from the warming of the earth's surface by the incoming solar radiation. Towns and cities produce a "heat island" effect and are measurably warmer than surrounding countryside – will mega size solar farms produce a similar result? Replacing a largely natural surface with a covering that is substantially artificial would also alter evapotranspiration rates. Evapotranspiration is the process by which water is transferred from the land to the atmosphere by evaporation from the soil and other surfaces and by transpiration from plants. Solar schemes that cover large areas of countryside will produce significant impacts in terms of the micro climate and could change the climate over a wider area. These consequences need to fully investigated and **climate and micro climate** impacts must be scoped in.

The socio – economic implications for the residents of the villages directly affected by these proposals which would transform the appearance of the countryside over a wide area that contains over 20 villages and the town of Long Stratton would be enormous. Every aspect of their lives would be impacted. Businesses reliant on tourism would suffer – the attractiveness of the area would be severely compromised and visitor numbers would decline. House values would depreciate, especially those houses alongside or surrounded by solar fields, and the enjoyment that residents currently experience through living in an area of tranquil, attractive rural landscape would be lost and not restored for at least 40 years, if ever. This is a vast subject and developers proposing mega size solar farms that would have a transformative impact on an area must evaluate fully the socio- economic consequences of those schemes and therefore **socio – economic** impacts must be scoped in.

Closely linked to the socio-economic impacts are the consequences for the mental health and well being of local residents who will suffer if a scheme of this size is permitted. These **mental health impacts** should be scoped in for evaluation

The impact on Rural Tranquillity should be scoped in as a separate topic because most of the countryside covered by these proposals is defined on the CPRE Tranquillity Map of England as "Most Tranquil" and East Pye admit that: *"this is an undeveloped area with a valued sense of remoteness and tranquillity. It has stayed historically intact and unspoilt because it avoided the effects of the Industrial Revolution."* It is important that these few remaining untouched areas of rural England should be protected from development to preserve their integrity for future generations. The vast scale of this scheme and the distances it stretches across the landscape, some 15 KM, would have a significant impact on the area's *"valued sense of remoteness and tranquillity"* and these aspects should be scoped into the Environmental Impact Assessment.

NB Tranquillity is not just about an absence of noise it also covers an absence of artificial structures, lighting etc.

Impacts on **users of PROW** must be scoped in as an entirely separate topic. These impacts will be huge and an initial study shows that over 22km of PROW would have solar fields along one side or both sides and many more sections of footpaths would have views ruined by the presence of solar panels and the associated infrastructure.

Tracker solar panels up to 4.5m in height will transform the appearance of the landscape and together with the intrusion of security fencing, security cameras, access tracks for vehicles, inverter buildings and substations in to the local countryside will rob walkers, cyclists and horse riders of the rural experience they currently enjoy when using these PROW.

Hempnall Parish Council asks for **photomontages** to be produced for inclusion in the ES for the following locations in order to illustrate the visual impacts that users of PROW would suffer if this scheme was permitted. There are many other locations that could be chosen that would reveal similar impacts to these.

1) Grid Reference 242 958 at the junction of Saxlingham Nethergate FP10 with Hempnall FP3 and Saxlingham Nethergate FP27 looking north eastwards across meadows (Site 7F) towards Saxlingham Green (currently an open view)

2) Grid Reference 254 974 on Boudica's Way (Shotesham FP17) looking eastwards across an open field and over Market Lane towards East Pye Site 8

3) Grid Reference 272 953 on Nobbs Lane looking north eastwards across a field (East Pye Site 7L) towards Woodton Road

If further clarification of the location of these viewpoints is required if requested a representative of Hempnall Parish Council will meet a representative of East Pye on site.

In addition to requesting that the **cumulative impacts** resulting from this scheme together with other renewable projects in the wider area (both built and proposed) are scoped in Hempnall Parish Council asks that the **huge scale** of this mega solar project is scoped in as a distinct topic so that the **combined impacts** of all the separate issues identified for inclusion in the ES, as they interact over a large area, are assessed. Evaluating each topic separately is not sufficient to identify the total impact of a scheme of this magnitude which is bound to be greater than the sum of its parts. No mega solar farm has so far been built in the UK and therefore the combined impacts of all the various elements of this kind of project (on PROW, ecology, landscape, lighting, cultural heritage etc) are not yet observable. It is essential that the ES appraises the overall level of transformative change and other consequences that would result from the construction of a huge solar energy project in tranquil rural South Norfolk.

The Environment Agency recommends: *"that solar panels and their infrastructure are not located within flood zones because there is potential for flood velocity and flood storage volumes to be affected by the panel support structures (legs and any associated bases) and any related infrastructure/buildings. Should flood velocity slow as a result of this, there is the possibility of flood water backing up and increasing flood risk elsewhere, especially upstream. Compensatory flood storage or hydraulic modelling can be required for solar farms within flood zones. There is also a risk of debris being caught up in the solar panel support structures or solar panels themselves as a result of flooding. The possibility of the solar panels becoming dislodged by flood water should also be investigated as they could pose a blockage risk downstream, especially to culverts"* Hempnall Parish Council therefore asks **that impacts resulting from flooding** and **also the potential for solar infrastructure to cause floods** are topics that are scoped in for inclusion in the ES.

It is also very important to ensure that impacts on designated **Conservation Areas** are fully assessed and this really requires conservation areas to be scoped in as distinct topic. Some really beautiful places, including Saxlingham Green, are very close to the proposed solar fields.

Hempnall Parish Council also considers that as the scheme is unlikely to be connected to the grid before the mid 2030s whether it is reasonable for the developer to attempt to justify this project on the grounds that it would make a contribution to the achievement of the government's 2030 95% Clean Power target and 2035 Net Zero target. A requirement to provide **a detailed breakdown of the timetabling of construction and grid connection should be scoped in**

Justification for the choice of **this specific location for this scale of project should also be scoped in**

A requirement for the developer to demonstrate that they have **explored reasonable alternatives should be scoped in**

The applicant should also be required to justify how this can be considered to be one NSIP project when it involves the construction of solar infrastructure at many different locations stretching over 15km from Great Moulton / Tivetshall to Brooke / Seething.

Attached to this Scoping Consultation Response is a report produced by a local Action Group (BEPS). Hempnall Parish Council recommends that it is carefully studied as it provides detailed analysis of the topics that should be scoped in and may therefore be of benefit to the Planning Inspectorate in its preparation of the written opinion as to the scope, and level of detail, of the information to be provided in the ES relating to the proposed development.

Please acknowledge safe receipt of this email- thank you.

Regards
Ian Nelson BFP FCA CF CLCA
Clerk to Hempnall Parish Council

T: 01508 498467 M: 07752 490884
Now Available "Virtually" all the time at http://www.hempnallpc.org
Facebook page

image.png

We issue a newsletter quarterly which contains useful information for Hempnall parishioners. If you would like to receive a regular copy of the newsletter by email please click on this link

Please consider the environment before printing this e-mail
This communication is sent for and on behalf of Hempnall Parish Council, Karinya, Bungay Rd, Hempnall, Norwich, NR15 2NG
CONFIDENTIALITY NOTICE
This communication together with any attachments contains information which is confidential and may also be privileged. It is for the exclusive use of the intended recipient(s). If you are not the intended recipient(s), please note that any distribution, copying, or use of this communication or the information in it, is strictly prohibited. If you have received this communication in error please notify us by e-mail and then delete the e-mail and any copies of it.
A copy of our GDPR Email Privacy Policy can be found here

East Pye Solar Project

Environmental Impact Assessment (EIA) Scoping Report

Date: January 2025

PINS Reference: EN0110014

Response written by BEPS - Residents Action Group



Gillian Marklew-Allen, *View from the footpath on EAST PYE SOLAR proposed site 3b looking toward the artist's house in Lundy Green.* Watercolour. January 2025.

Contents

Opening Statement in response to the proposed East Pye Solar project 4
Detailed Response to the Environmental Impact Assessment (EIA) Scoping Report 4
NSIP and EIA Process 4
Justification of how this is considered to be one NSIP project 5
Justification for this project to meet the government's Net Zero 2030 and 2035 targets 5
Justification for the choice of this specific location for this scale of project 7
Proposed scope of the East Pye Solar EIA 9
Exploration of Reasonable Alternatives 10
Cumulative impact across all aspects of the EIS 11
Climate change adaptation 13
Major Accidents and Disasters 13
Air quality and associated risks to human health 14
Telecommunications, Television Reception and Utilities 14
Electric, Magnetic and Electromagnetic Fields 15
Glint and Glare 15
Glint and Glare impact specifically on airfields 16
Wind Microclimate 17
Impacts and cumulative impacts on remoteness and tranquility 17
All aspects of Cultural Heritage 18
All aspects of Human Health and cumulative impact on human health. 19
Rider and horse safety and enjoyment 20
Community, identity, culture, resilience and influence 21
Water quality or availability impacts to human health 21
Effectiveness of Environmental Mitigation 22
Contamination/damage to soil 22
Ground conditions 24
Environmental 24
Environmental impact to common species 25
Wintering/Passerine birds 25
Lighting 25
Impact of decommissioning on any Biodiversity Net Gain 26
Water and Flooding 27

Private water supplies and drinking water 27
Arboricultural 29
All socio-economic impacts 29
Employment and income 29
Economic impact to homeowners 30
Section specifically on BESS Site/Substration & Grid Connection Infrastructure 32

Opening Statement in response to the proposed East Pye Solar project

The area proposed to site the East Pye Solar utility-scale power plant is a valued, tranquil and unspoilt agricultural landscape of small Domesday Book villages, hamlets and isolated farmsteads with dark skies and a unique biodiversity (South Norfolk Claylands), including maternity roosts of critically endangered barbastelle bats in multiple locations. It has many village conservation areas, Grade I Listed churches, and a nationally significant collection of Grade II* and Grade II Listed medieval farmsteads. These building 'are of great historic and architectural interest and form one of the most widespread and impressive survivals of pre-1750 farmstead buildings'.[1]

East Pye Solar admit they are unable to list all the Grade II Listed buildings impacted by this scheme beyond 100m - they have had to create an entire separate volume, because there are simply too many of them. The landscape has associations with the Norwich painter John Crome and Sir Alfred Munnings, and many of the buildings affected by this scheme are listed in Pevsner's *Buildings of England* (first published 1962). This is indicative of the value of this landscape and its cultural heritage and demonstrates that this utility-scale power plant project, stretching across some 15KM of our landscape is entirely inappropriate for this location.

Detailed Response to the Environmental Impact Assessment (EIA) Scoping Report

NSIP and EIA Process

The level of detail contained in East Pye Solar's EIA Scoping document is insufficient to show compliance with legislation and the "best practice" as quoted by EPS.

The use of almost 5000 acres of scattered parcels of agricultural land to build a 2300-acre solar farm is both environmentally reckless and financially unsuitable.

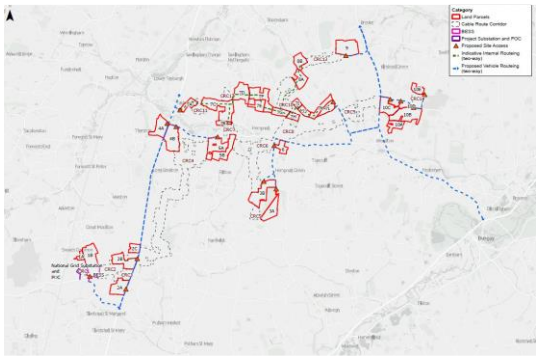
The repeated use of 'could, may and consider' implies minimal contractual obligation for the principal contractor to comply and a very low ROI.

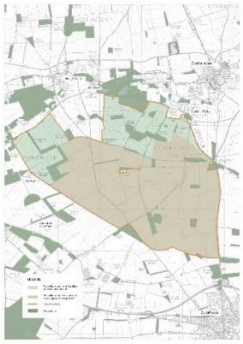
There are insufficient skilled UK contractors, equipment or materials (particularly cement) to satisfy the needs of all the planned development projects.

[1] Natural England, *National Character Area Profile 8: South Norfolk and High Suffolk Claylands*.

The applicant should justify how this is considered to be one NSIP project

How can this be considered one project given that it is at 10 sites stretching across some 15km and 14 separate parishes and therefore requires such quantities of cabling as to cause significant damage to such an extensive area of landscape? This project is neither discrete, efficient, nor compact like Island Green's other proposed Norfolk NSIP solar project The Droves.





Due to the level of detail required to respond to the proposals for the BESS Site/Substration & Grid Connection Infrastructure, Sites 1A, 1B, 2A, 2B, 2C will be addressed separately at the end of this documents.

Justification for this project to meet the government's Net Zero 2030 and 2035 targets should be scoped in

East Pye Solar states that 'the UK government intends to increase solar capacity to 70GW by 2035'.[2] It fails to state that the Government only plans to site 900MW of that in the East of England to meet its 2035 target.

The UK government's target for 2030 is 47GW.[3]The transmission entry capacity register (TEC register) currently (January 2024) has over 500 solar projects in the queue 'with a combined capacity of just under 200GW'.[4] NESO states that 'the 2030 connection queue has higher capacities of solar and onshore wind than is required.'[5]

The UK Government *Clean Power 2030 Action Plan* explains that the UK as of 2024 already has 16.6GW of solar in operation, has a further 23.8GW committed or under construction, and only needs 47GW of solar power in total to meet its 2030 target:[6]

[2] Josh Cornes, 'Breaking down the solar grid connection queue', 8 January 2025, *Solar Power Portal*.
[3] UK Government, *Clean Power 2030 Action Plan: A new era of clean electricity*, pg. 32.
[4] *Idem.*
[5] NESO, *Clean Power 2030*, pg. 27.
[6] UK Government, *Clean Power 2030 Action Plan: A new era of clean electricity*, pg. 73.

The UK Government states: 'to achieve Clean Power 2030, technological and locational factors need to be considered in the connection process so the right projects can connect in the right place at the right time.'[7] UK Government clearly states that it only requires an additional 100MW of solar power to be situated in the whole of the East of England to meet its 2030 Net Zero target and only another 900MW to meet its 2035 target.[8] It also only requires another 200MW of battery storage to meet its 2035 target for the East of England.[9] There is already a 228MW BESS applying for planning permission 700m west of Long Stratton.[10]

Table 2: Regional capacity breakdowns for transmission connected technologies required for 2030[20] and 2035[21]

Transmission network region	Solar (MW) 2030	Solar (MW) 2035	Onshore wind (MW)[22] 2030[23]	Onshore wind (MW) 2035	Batteries (MW)[24] 2030	Batteries (MW) 2035
N. Scotland	100	800	5,500	-	1,900	1,900
S. Scotland	600	800	8,800	-	3,900	3,900
N. England	500	1,400	-	-	800	800
N. Wales, the Mersey and the Humber	1,200	1,700	300	-	4,200	4,200
Midlands	4,000	5,200	-	-	1,300	1,300
Central England	2,100	3,300	-	-	500	500
E. Anglia	100	900	-	-	200	200
S. Wales and the Severn	1,100	1,300	1,300	-	900	900
S.W. England	300	300	-	-	400	400
S. England	200	200	-	-	100	100
South East England	600	1,100	-	-	1,700	1,700
GB total	**10,800**	**17,000**	**15,900**	**-**	**15,900**	**15,900**

Note: MW capacity figures have been rounded to the nearest 100 MW.

By the time 500MW East Pye Solar comes to Inspection at the end of this year, both the 100MW target for 2030 and the 900MW target for 2035 for the East of England will already have been met by solar projects ahead of it in the queue currently being examined.

The government also does not specify that this additional 900MW of solar capacity for the East of England must be ground-mounted, nor that it should be sited on productive agricultural land. Indeed, they state that brownfield sites should be used for new infrastructure, and that food security is national security.[11] Italy has now banned ground-mounted solar on agricultural land[12], and France only permits it if it can be guaranteed that

[7] UK Government, *ibid.*, pg. 66.
[8] UK Government, *Clean Power 2030 Action Plan: A new era of clean electricity*, connections reform annex pg. 13
[9] *Idem*.
[10] Green Switch Capital, Wacton Road Energy Storage Facility. Home | Green Switch Capital
[11] UK Food Security Report 2024, 'Food security is national security', Labour says in manifesto - FarmingUK News
[12] Italy bans PV from agricultural land – pv magazine International

the land will continue to produce the same quantity of crops once the solar infrastructure is installed.[13]

The UK Government acknowledges that for the period between 2030 and 2050, it should focus on renewables projects that have long lead-times and use new technology, such as hydrogen and Small Modular Nuclear Reactors. In the hydrogen and nuclear evolution scenario, the demand for solar will be significantly reduced.[14]

The EPS scoping document outlines: 'Part 3 of EN-1 identifies the need that exists for nationally significant energy infrastructure. With regards to decision making, paragraph 3.2.2 of EN-1 states:

"We need a range of different types of energy infrastructure to deliver these objectives. This includes the infrastructure described within this NPS but also more nascent technologies, data, and innovative infrastructure projects consistent with these objectives".

This is neither an example of nascent technology, nor an innovative infrastructure project. Beyond 2035 renewables technology will have advanced to such an extent that out-dated ground-mounted solar projects on BMV agricultural land such as the East Pye Solar scheme will have been replaced by more efficient technology that does not jeopardise food security.

Despite this clear set of UK Government requirements for only 100WM of additional Solar in the whole of the East of England by 2030, and only 900MW by 2035, East Pye Solar is one of four NSIP utility-scale solar projects with agreed TEC register grid connections currently scoping in the small area between Long Stratton and Gissing in South Norfolk. The potential generation capacity of these NSIP solar projects totals over 2.2GW, more than double the 900MW required to meet the Government's 2035 Net Zero targets for the whole East of England.

Even Solar Power Portal, the solar industry's own website, states: 'With less focus on transmission connected projects, almost the entire capacity targeted for before 2030 is already in planning, creating little room for any projects at the pre-planning stage.'

Justification for the choice of this specific location for this scale of project should be scoped in

Although East Pye Solar quotes paragraph 4.1.5 of EN-1 which 'states that in considering any proposed development, and when weighing its adverse impacts against its benefits, the SoS should take into account:

[13] France issues new rules for agrivoltaics – pv magazine International

[14] Neso, *Future Energy Scenarios: pathways at a glance*, pg. 14.

"Its potential benefits including its contribution to meeting the need for energy infrastructure, job creation, reduction of geographical disparities, environmental enhancements, and any long-term or wider benefits.

Its potential adverse impacts, including on the environment, and including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce, mitigate or compensate for any adverse impacts, following the mitigation hierarchy".[15]

East Pye Solar have already openly admitted that local communities will gain no socio-economic benefits whatsoever from this project, neither in terms of employment, skills nor even any energy from it.[16] They have also admitted, in a landscape with ancient woodland, endangered species and particularly barbastelle maternity roosts, that this project is likely to cause significant damage to our ecology including (quote):

- Habitat loss, disturbance or fragmentation (during construction and decommissioning);
- Disturbance, displacement, or mortality of wildlife (during construction, operation, and decommissioning);
- Disturbance, damage or loss of protected species breeding sites, hibernation sites or resting places (during construction, operation (panel replacement), and decommissioning);
- Noise and/or visual disturbance to species using the Sites (during construction, operation (panel replacement), and decommissioning);
- Impacts to designated sites or habitats through generation of dust or other pollutants (during construction, operation (panel replacement), and decommissioning); and
- Disturbance and pollution (indirect effects such as noise and vibration, dust, pollution, surface water run-off during construction, operation (panel replacement), and decommissioning)[17]

There are so many Listed Buildings surrounding this proposed scheme that the applicants have had to create an entire extra gazetteer to list them all: i**t is 67 pages long.** EPS state: 'It is considered that there is the potential for likely significant effects upon the historic environment resulting from the Scheme, based on the current proposals at the time of writing. These may include:

- Direct impacts upon archaeological features and deposits resulting in their partial/total loss as a result of construction; and

[15] 1.8.26
[16] East Pye Solar EIA Scoping document, 5.11.6, pg. 133-137.
[17] East Pye Solar EIA Scoping document, 8.8.7, pg. 208.

- Indirect impacts on the significance of designated heritage assets through changes to their settings, as a result of the presence of construction or decommissioning activities, or operation of the Scheme.'[18]

EPS quote EN-1 that 'public benefit must be weighed against any loss or harm to the significance of a designated heritage asset (Section 5.9.32 to 5.9.33). However, this project is of a scale in excess of requirements to the UK government's own 2030 and 2035 Net Zero targets; there is therefore no public benefit, either to the wider UK population or to the local community, as EPS have openly admitted.

From the outset, it is clear that this project is completely inappropriate for this location.

A justification for why there is any need for an NSIP solar project in this specific location, or indeed for the East Pye Solar project at all, should be scoped in. This should be addressed particularly in relation to other proposed NSIPs in Norfolk ahead of East Pye Solar in the inspection queue. RWE's High Grove solar NSIP (720MW) and Island Green's other proposed solar NSIP, The Droves (500MW), both in Norfolk, combined would generate 1.2GW of power, just by themselves exceeding the government's remaining 900MW goal for the entire 2035 solar requirements of the East of England.

Impact on the Broads National Park should be scoped in

Site 3a lies only 2 miles from the Broads National Park. Broads Authority's documents state that projects planned within 3 miles of their boundaries should consult with them.[19]

Proposed scope of the East Pye Solar EIA

The topics East Pye Solar propose to scope into the assessment are:

- Cultural Heritage
- Landscape & Visual
- Ecology & Biodiversity
- Transport & Access
- Noise
- Climate Change
- Soils and Agricultural Land

Areas East Pye Solar have requested to scope out the following categories:[20]

- Air Quality
- Water Environment

[18] *Ibid*, 9.6.2, pg. 232
[19] https://www.broads-authority.gov.uk/__data/assets/pdf_file/0025/184813/photovoltaics-1,-2-App-3-Part-2.pdf https://www.broads-authority.gov.uk/planning/planning-policies/landscape-sensitivity-studies
[20] *Ibid,* 5.1.1, pg. 96

- Major Accidents and Disasters
- Electric, Magnetic and Electromagnetic Fields
- Telecommunications, Television Reception and Utilities
- Wind Microclimate
- Daylight, Sunlight and Overshadowing
- Glint and Glare
- Lighting
- Minerals
- Waste and Materials
- Socio-Economics
- Human Health
- Arboriculture; and
- Ground Conditions

It is notable that, contrary to what East Pye Solar claim, all these aspects pose significant impacts, which are either extremely challenging to mitigate or which question the viability of the entire project. We call for these areas to be scoped into the Environmental Impact Assessment, with our reasons outlined below.

East Pye Solar also propose to scope out subsections of categories that would be otherwise included in the Environmental Impact Statement. Again, this appears to be because they pose significant impacts that are impossible to mitigate, and they are therefore hoping not to address them publicly in detail.

Exploration of Reasonable Alternatives should be scoped in

East Pye solar quote paragraphs 2.10.19 – 2.10.48 of EN-3, which set out the following key considerations involved in the siting of a solar farm, in addition to considerations specific to individual projects:

- *'Irradiance and site topography*
- *Network connection*
- *Proximity of a site to dwellings*
- *Agricultural land classification and land type*
- *Accessibility*
- *Public rights of way*
- *Security and lighting'*

This project, by its own admission, would cause glint and glare to six airstrips to an extent that the Norfolk Gliding Club would cease to be able to operate; it is mainly located 15KM from its proposed network connection; it impacts hundreds of residences, the majority of which are Listed Buildings, and adjoins and even completely surrounds some individual homes and businesses; it is all sited on BMV agricultural land of grades 2, 3a and 3b; the narrow, single-track country lanes make it

completely inaccessible for heavy goods vehicles without having to build new roads across agricultural land; it impacts around 30KM of public rights of way, either temporarily or permanently; it proposes floodlighting both during construction and operation in a dark skies area with no streetlighting with maternity roosts of barbastelle bats, a wide range of other protected bats, owls and other night-dwelling creatures.

In every aspect of the list they quote, this project fails to satisfy any of its own requirements. The magnitude of change and impact would be extremely high.

Due to this, these questions regarding reasonable alternatives should be scoped in:

- How have reasonable alternatives been considered?
- Present assessments of alternative location and sites. Date and reasoning for selection of this site.
- How have considerations been made of options with less damaging effects on the environment been carried out, to deliver the greatest environmental gains.
- Which brownfield sites, and sites not on BMV agricultural land have been considered?
- Provide a summary record on their decision-making on alternatives.
- Why do the panels need to be 4.5m and 3.5m high? This is an Irish-owned company and in Ireland the maximum panel height is 2m.
- Why is this plan the best it can be?
- Summary of cumulative effect of how this project benefits the landscape and community in terms of design and amenity.

Cumulative impact should be scoped in across all aspects of the EIS

There are already multiple solar projects either in operation, or consented for construction in South Norfolk, as well as another three with grid connections agreed in the same area.

Built:

- Tasburgh
- Trowse 1 and 2
- Bracon Ash solar and BESS

Consented:

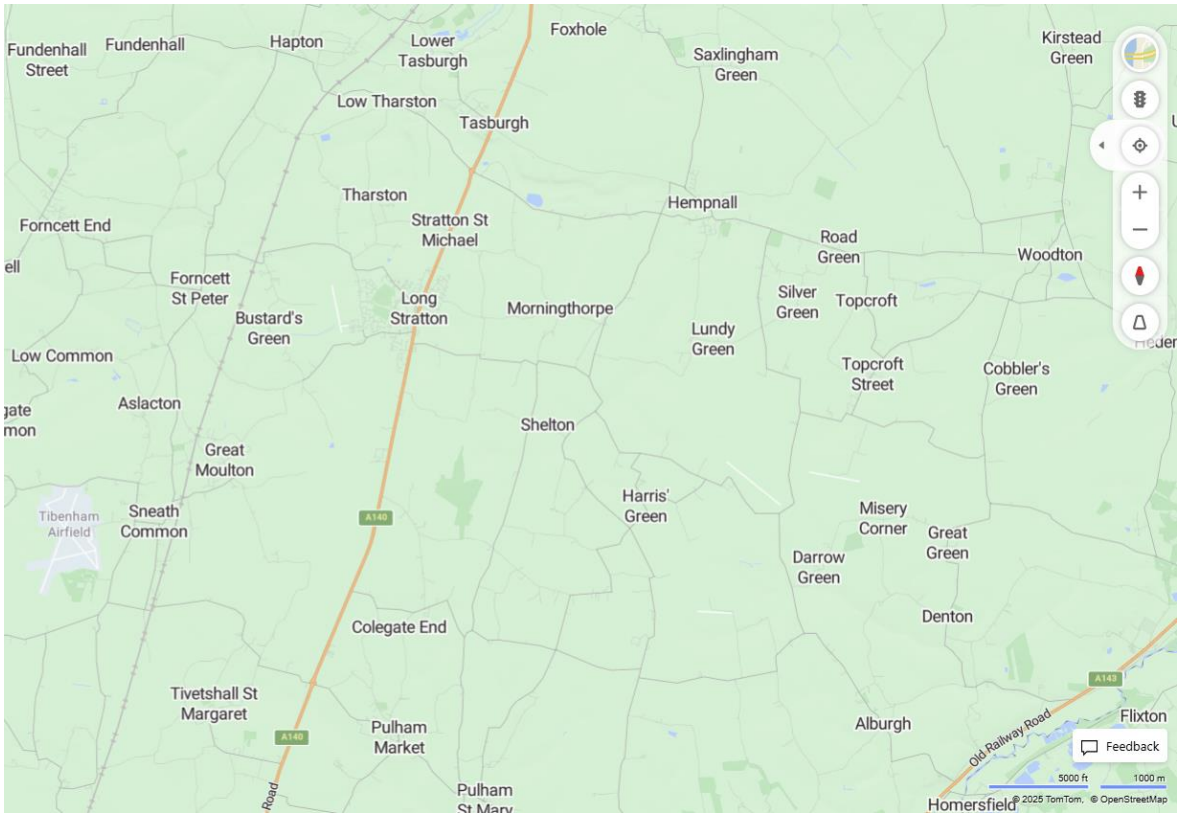
- Bloys Grove 49.9MW

Scoping: These projects have not been added into the potential cumulative impact in EPS documentation

- Long Stratton 400KW + BESS (Location unknown, South and West of Long Stratton)
- Green Switch Capital, Wacton Road Energy Storage Facility (BESS), 228MW

- Noventum – Long Stratton 500KW + BESS (scoping immediately adjoining East Pye Solar scheme, north of Long Stratton and Hempnall, around Shotesham (EPS site 8)
- Gissing 900KW + BESS (location unknown, directly south of Easy Pye Solar scheme between Long Stratton and Diss)
- Maltings solar farm at Tivetshall (directly adjoining East Pye Solar BESS site to the west).

As listed above, East Pye Solar is one of FOUR NSIP projects with agreed grid connections for utility scale solar power plants just in the small area outlined on this map, between Gissing (lower left) and Long Stratton. These projects could remove around 17,000 acres of agricultural land from farming use. This quantity of solar infrastructure in this rural/agricultural area on the edge of the Broads National Park is inappropriate and completely excessive.



In addition to this, RWE are in pre-application stage for High Grove Solar Farm 700KW in South-West Norfolk. East Pye Solar's parent company Island Green already owns Trowse 1 and Trowse 2 solar plants, to the north of this proposed site. They are also developing plans for the Droves 500KW, another NSIP utility-scale site in South-West Norfolk.

Other infrastructure consented or planned for the area:

- Norwich to Tilbury Pylons
- Orsted BESS (south of A47)

- 1,800 houses plus associated infrastructure, new school, surgery, landscaping associated with the Long Stratton by-pass. Immediately to east of East Pye Solar Scheme.

These developments, particularly the excessive number of proposed NSIP solar farms are likely to have significant cumulative impacts on all aspects of the EIA, particularly ecology including common species, tourism, landscape and visual amenity, cultural heritage, transport (including PRoW), noise and vibration and particularly on human (mental) health, economic and wellbeing for all phases of the project. The cumulative impact of all these schemes should be scoped in from the start.

Climate change adaptation should be scoped in

As recently ruled in Scotland regarding the Rosebank and Jackdaw oil and gas fields, there should be a full impact assessment of the climate altering emissions and impacts to human health and human rights in the countries in which the panels and other equipment are manufactured, as well as the carbon footprint of the project, including global shipping and disposal of waste. Population health is not only our own populations but its impact on all populations involved in this project's creation.

For this reason, Waste and Materials should also be scoped in to demonstrate how and where damaged panels will be recycled, or all equipment will be recycled at the end of its lifespan. Chinese panels should not be used for this project if they contain PFAS and are unable to be recycles in the UK. It is particularly important to know how will unrecyclable materials such as PFAS (forever chemicals) be dealt with, and how all land will be decontaminated and returned either to its former agricultural grade or an improved grade once the project is decommissioned. Figures in the EIA to calculate waste production are currently incorrect by a factor of two.

Major Accidents and Disasters should be scoped in

Section 5.14 Human Health and **Section 5.4 Major Accidents and Disasters**. Absolutely should be scoped in. EPS admits 'In the unlikely event of a fire within the BESS, unplanned air emissions could result in the release of Hydrogen Fluoride (HF), which may impact nearby receptors depending on the location of the BESS in relation to sensitive receptors and the design of the BESS. However, this is unlikely to occur. A key design principle applied to the design is that BESS will not be located closer than 100m to sensitive human receptors (as described above) which will be secured through the DCO.'

The current proposed site for the BESS is upwind from a village. The Fire Service is not a statutory consultee on this project.

There have been a significant number of BESS fires now globally, with some in the UK taking as long as 59 hours to put out. How would such a fire be extinguished, given that BESS fires are currently left to burn out. The BESS should be sited significantly further away from habitation if the fire is to be left to burn.

Would fire suppressants be used? If so, which? The proposed BESS site is on a drinking water protection area and river catchment protection area, there is a significant risk of PFAS pollution of both drinking water, ground water and local rivers if there were to be a BESS fire. The environmental impacts of such a disaster to local residents and wildlife, as well as soils and rivers should be scoped in.

Air quality and associated risks to human health should be scoped in

'An assessment of air quality effects during operation is therefore scoped out of the ES.' Impact of potential damage to air quality from BESS fire should be scoped in, and associated risks to human health.

Other major impacts such as storm damage should be scoped in, especially in light of the Storm damage to the Solar farm on Anglesey.[21] How would contamination to soils and ground water from toxic materials in the solar panels be averted in the result of such a storm?

The impact on surrounding homes, listed buildings and ecology of any explosion from the unexploded ordnance on sites 3a and 3b should also be scoped in.

Telecommunications, Television Reception and Utilities should be scoped in, and also included within Major Accidents and Disasters

Several of the proposed sites for solar panels (5, 7E and 7F and 8) are on top of the high-pressure gas pipeline that runs through Norfolk from Bacton, which is classed as a Major Hazard (MAHP). The proposed 400KV substation on site 5 and the welfare buildings for workers are also proposed to be built on it. The cable corridor would also potentially cross it. This is a significant risk not only to the PV farm but also to the surrounding area and public safety.

'PV farms carry an increased risk of a strike and lightning surge currents are of a magnitude and duration that could pass from any lightening protection or electrical the earth system to the pipeline.'[22]

[21] Solar Farms and Wind Turbines Tested and Failed by Storm Darragh | TheCivilEngineer.org
[22] UKOPA, 'Good Practice Guide: Managing developments and works in the proximity of high-pressure pipelines', January 2022, pg.

'Pipeline operators are required to consider societal risk, the boundaries for calculating this, is often outside the wayleaves and easements and extend a considerable distance. […] increased population density and infrastructure on these zones could alter the area classification of the pipeline.'[23]

Limits are placed on 'vibration levels allowable near the pipelines – particular attention should be made to distances for piling…' [24]Any damage or potential damage to MAHP pipelines 'is likely to lead to serious safety, environmental and/or security of supply issues.'[25] The siting of a 400KW substation in close proximity to it, is also therefore of serious concern.

There are also pylons and overhead cables crossing several of the sites, that will require continued access to their easements. This may require additional access tracks or areas where development is not permitted. There are also impacts to siting solar infrastructure beneath overhead cables, such as lightning strikes, damage from falling cables or falling ice, earthing of metal fencing, rising of earth potential around base of pylons.

It is therefore essential that Utilities are scoped in and the whole section on Major Accidents and Disasters should be scoped in. It should also scoped into the related aspects of other sections, particularly human health, utilities, air quality and ecology.

Electric, Magnetic and Electromagnetic Fields should be scoped in

Assessments of electric, magnetic and electromagnetic fields should be scoped in, particularly in areas where overhead cables and pylons are proposed to be used, also in areas to be grazed by animals (eg. cable corridors). Animals are more susceptible to EMF radiation than humans and significant impacts to cattle from EMF have been reported.

There should also be a thorough evaluation of EMF effects on sensitive species such as bats. There is evidence that bat activity significantly reduces in habitats exposed to an EMF strength of greater than 2v/m. As we have very large bat populations, particularly of rare bats, Electric, Magnetic and Electromagnetic Fields should be scoped in.

Glint and Glare should be scoped in

EPS suggest that: 'No significant impacts from glint and glare are considered possible upon pedestrians/ users along PRoW. The reasoning is due to the sensitivity of the receptors (in terms of amenity and safety) being concluded to be of low significance. '[26]

[23] Ibid. pg 8.
[24] Ibid. pg. 10.
[25] Ibid. pg. 10.
[26] East Pye Solar EIA Scoping document, 5.7.23, pg. 123.

This assumption is incorrect, as there is a significant safety impact to horse riders on bridleways. There is a significant safety hazard associated with reflections towards a horse and rider on a bridleway, especially if the bridleway is to be fenced on both sides, so preventing the rider from circling in the event that the horse bolts due to glare. This is also a significant glare impact to horse riders on public roads, and assessment of these impacts should also be scoped in.
'Solar reflections towards sections of the A140 and B1527 are within a road user's primary field-of-view and visible. Therefore, mitigation would be recommended for these sections of road.' There should be a detailed assessment of the impact of glint and glare in this location and proposed mitigation should be modelled to test whether it would actually be effective and whether there would be any interim impacts. If screening is proposed as mitigation, then an assessment should be made of how long it would take for this to prove effective, given the height of the infrastructure.

EPS states: 'The duration of solar reflections towards some residential dwellings occur for more than three months but less than 60 minutes on any given day. Therefore, mitigation would be recommended for these dwellings.' This is a significant impact and should be scoped in. Detailed plans should be submitted of the proposed mitigation for each affected residence. If screening by native hedges/tress is proposed, it would take a decade to grow tall enough to have any effect. Therefore, there needs to be a proper assessment of the interim impact of glint and glare on affected homes until any 'native species' screening is effective. There should also be an impact assessment of whether the solar arrays sited around houses would increase the heat of the air or soil at those properties, which could cause impacts to buildings and residents.

Glint and Glare impact specifically on airfields should be scoped in

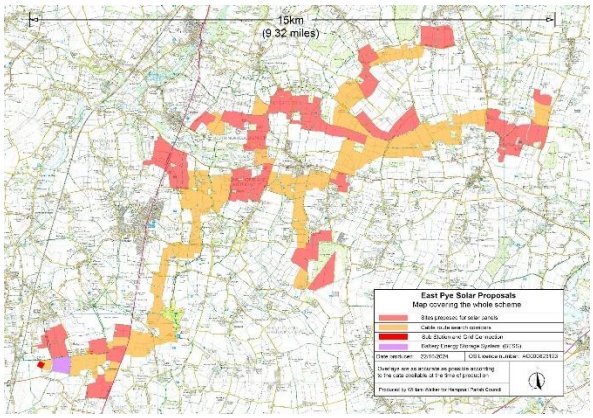
Since East Pye Solar has chosen to situate its project in an area with six active airfields, it is imperative that glint and glare should be scoped into the Environmental Impact Assessment, particularly where this poses an existential threat to existing airfield operations.
'Solar reflections towards some aerodromes are greater than the acceptable limits of 'low potential for temporary after-image' and would therefore require consideration to the aerodrome's specific operations.'[27] The EPS document specifically says that Norfolk Gliding Club may be impacted by glint and glare, affecting their flying activities, and that this cannot be readily mitigated: 'Existing operation of the Norfolk Gliding Club may be affected as a result of glint and glare from the Photovoltaic panels affecting flying activities.' [28] Therefore, it is completely unacceptable to attempt to scope Glint and Glare out of the Environmental

[27] East Pye Solar EIA Scoping document, 5.7.24, pg. 123
[28] East Pye Solar EIA Scoping document, 5.11.6, pg. 135

Impact Assessment. Especially as Norfolk Gliding Club state that the person sent to do the initial assessment has neither experience nor understand of the issues associated specifically with gliders. A full glint and glare assessment specifically relating to the six airfields impacted by this scheme should be scoped in, for the full range of different aircraft that use those facilities. No existing airfield should lose its function or ability to operate due to a new planning proposal.

Wind Microclimate should also be scoped in due to impact for airstrips and gliding club.

Impacts and cumulative impacts on remoteness and tranquility should be scoped in





Most of the countryside covered by these proposals is defined on the CPRE Tranquillity Map of England as “Most Tranquil.” East Pye admit that this is an undeveloped area with a valued sense of remoteness and tranquillity. It has stayed historically intact and unspoilt because it avoided the effects of the Industrial Revolution. It is important that these few remaining untouched areas of rural England should be protected from development to preserve their integrity for future generations. The vast scale of this scheme and the distances it stretches across the landscape, some 15 KM would have a significant impact on the areas’ ‘*valued sense of remoteness and tranquillity’*, and these aspects should be scoped into the Environmental Impact Assessment.

All aspects of Cultural Heritage should be scoped in

Ours is a rural landscape with wide-open spaces and expansive views. The scale, size and industrial appearance of the proposed East Pye Solar power plant would have a significant impact on the settings of conservation areas (several directly adjacent to the proposed sites) and the settings of multiple Listed Buildings of all grades. EPS state:

'Due to their prevalence in the area, Grade II Listed Buildings are reported up to 100m only.'





(l-r: directly opposite site 5b; directly opposite site 4b; directly adjacent to site 5b.)

The large number of Listed Buildings impacted by this proposed scheme is because this is an area of high historical significance. It is inadequate to only list the impact to Grade II Listed Buildings within 100m of the site, as due to the flat and expansive nature of the landscape and the height of the proposed infrastructure (4.5 or 3.5m high), it is very likely that it will significantly negatively impact the settings of multiple Grade II Listed buildings at a greater distance than 100m from the sites. Its impact on the area as a whole will damage the importance of this area as a largely untouched nationally significant collection of pre-1750s agricultural buildings. As these buildings are primarily farmsteads and rural churches, their appropriate protected settings are rural and agricultural, not industrial.

The range of assessment of Grade II Listed Buildings should be increased to at least 500m (the best-practice distance of any residence from solar infrastructure), if not further, with sightlines tested for those assets impacted at an even greater distance where there is any visual impact. It should also be noted that the distances measured should be from the edge of the curtilage of the Listed Building, not from the Listed Building itself.

There may also be other impacts to Listed Buildings in terms of vibration from construction, and impacts or vibration from traffic (particularly to Listed retaining walls or structures along narrow lanes). Timber-framed and clay lump buildings are particularly susceptible to damage from vibration, and this is the construction method of most of our pre-1750s farm buildings.

As it is proposed that native hedging/trees will be used for screening purposes, there will be at least a decade until such new plantings reach a height adequate to screen infrastructure that is either 4.5 or 3.5m high. The significant negative interim impacts to cultural heritage should also be scoped into the assessment.

Direct and indirect impact to cultural assets during the construction and decommissioning phases should be scoped in, as there are risks to timber-framed and clay lump buildings from vibrations and direct impact from large vehicles.

The cumulative impacts to cultural heritage of all the proposed developments listed above should also be scoped in. Some of these buildings, specifically the timber-framed farmhouse in the image above, are already being impacted by other projects, in this instance the Long Stratton Bypass.

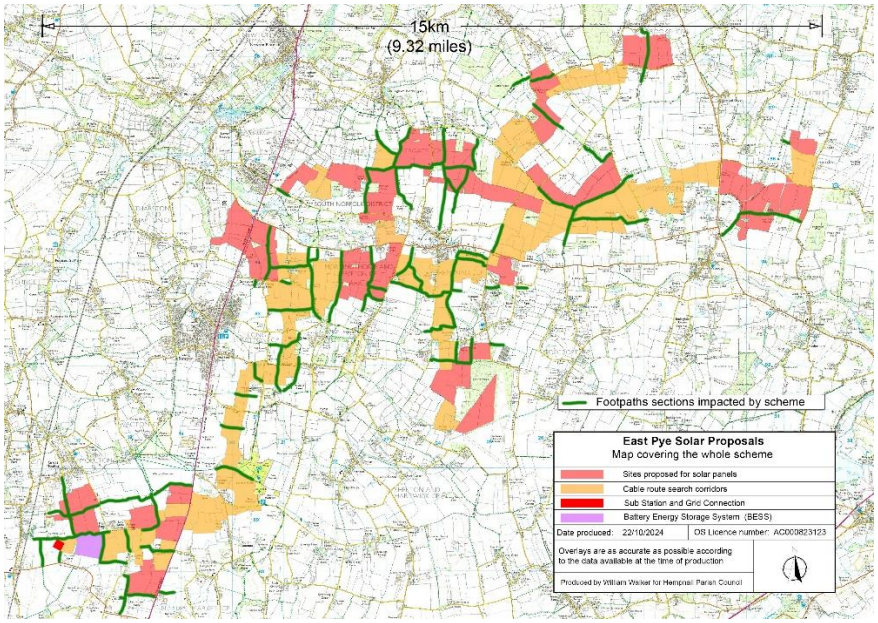
Maps should be provided with all Listed Buildings marked and all other proposed infrastructure included, at whatever stage, so the true threat to cultural heritage can be estimated. Visualisations should also be provided of the proposed type of infrastructure, its distance and screening in relation to the Listed Building.

All aspects of Human Health should be scoped in. Cumulative impact on human health should also be scoped in.

This utility-scale power scheme is already having significant mental health and wellbeing impacts on the community. This is both in terms of the threat of the scale and extent of change, and permanent damage to residents' attachment to place and their visual amenity. The cumulative impact on human health, particularly mental wellbeing, of these four utility-scale solar power plants with connection agreements, potentially covering some 17,000 acres of our landscape in South Norfolk should be scoped in. Residents impacted by the scheme/s are already reporting significant feelings of anxiety, powerlessness and despair.[29]

Impacts to human health of a BESS fire and mental health should also be scoped in as EPS have chosen to site their battery site upwind from a small rural Domesday Book village with a population of less than 1000 and a large number of listed buildings. Community safety is also impacted by the siting of the BESS and should be scoped in.

[29] 'People Versus Power', *The Observer*, 29 December 2024. Solar farms v people power: the locals fighting for their county | Solar power | The Guardian



Public Rights of Way should be scoped in as a separate chapter

A significant number of Public Rights of Way will be impacted by this scheme. No one is going to walk along footpaths or bridleways between hundreds of acres of 4.5m high solar panels with 2.5m high fencing and security cameras.[30] It will also be unsafe to ride in these areas. This project will have a very significant impact on the ability of walkers and riders to be able to enjoy the countryside. The actual impact will be that we will lose these rights of way because they will be so visually unappealing covered in industrial infrastructure in our rural landscape that there will be no reason to continue to use them. As this project would impact so many of our PRoW, the impact of this loss of use on human health should be scoped in.

Rider and horse safety and enjoyment should be scoped in

A baseline for rider and horse safety and enjoyment of bridleways should be included. This is not mentioned at all in the project plan. Impacts on safety for riders and horses of specific equipment, glint and glare, layout, fencing, distances adjoining or running through bridleways. Baseline and impact modelling of specific situations including spooking, bolting, rearing in current situation compared to alongside or in the middle of solar equipment and infrastructure that will be installed on each specific site.

All foreseen impacts for riders and horses during construction and decommissioning both on roads and bridleways and mitigations proposed.

[30] East Pye Solar EIA Scoping document, 5.12.9, pg. 140–3.

Community, identity, culture, resilience and influence should be scoped in

The scale of the proposed 300- to 700-person workforce is equal to or larger than the populations of some of the hamlets affected.

Community, identity, culture, resilience and influence – how the community perceives their surroundings – will be changed for the rest of their lives as this project has a span of 60 years, therefore this should be scoped in. The community feedback submitted to EPS so far is overwhelmingly against this project. There is no sense whatsoever that it will foster a 'sense of pride', as EPS optimistically state. So far the project proposal has created only community division, with individual farmers siting infrastructure directly around their neighbours' houses, causing mental anguish and putting families in negative equity. The project is so far only fostering a sense of communal devastation and mourning at the proposed destruction of our landscape.

Other questions that need to be answered. How will these temporary workers get to work, move around or purchase food? Their car use has not been included in the traffic management plans. Where will the proposed portacabin shanty town be situated? There is currently inadequate public transport to reach these site locations, specifically for these quantities of workers. Seasonal agricultural workers already use the limited public transport, how will it sustain the addition of 300 to 700 additional workers in the area. Who will these people be, where will they come from? What safeguarding checks will be made about them before bringing them into our communities? Additional traffic on tiny country lanes, parking, sewage, refuse etc should be fully assessed. The EPS assessment of the populations of these tiny hamlets are inaccurate – they are in rural areas, away from the large villages they discuss.

Water quality or availability impacts to human health should be scoped in

The project is proposed to be located in an area of private water supplies, on areas protected for drinking water quality. All private drinking water supplies within 1KM of the site should be identified, and all impacts of the development to them scoped in.

EPS has already admitted that construction and decommission will cause run-off and silt. Toxic substances such as concrete, galvanised steel (zinc and lead) and aluminium are proposed to be pile-driven up to 4m into drinking water protection zones within close proximity to wells and boreholes. Contamination from microcracking caused by weathering and storm damage also poses the risk of toxic materials leaching from the panels themselves into ground water and aquifers. Solar panels are regularly coated with PFAS, which can leech into the ground water and aquifers. Underground plastic ducting and cabling also poses the risk of leeching PFAS and PFOS into ground water and aquifers. Fire-suppressant foams also pose a risk of contaminating drinking water supplies.

If water quality is damaged, homes and businesses will entirely lose their only potable water supplies. This is a significant risk to human health and should be scoped in.

Effectiveness of Environmental Mitigation should be scoped in

Mitigation proposals should be created for all endangered species recorded at all sites, both in desk-based and on-site surveys. Peer-reviewed evidence should be supplied that proposed mitigations are effective How will they address levels of uncertainty? How will they meet the costs of ongoing monitoring and data collection to check mitigation is effective? How will they address issues of ineffective mitigation? How will they Guarantee that measures proposed as mitigation to address the environmental impacts development are implemented as originally proposed? How will mitigation measures be enforced? How will funds be attached for this purpose to the project if the shell company dissolves?

Contamination/damage to soil should be scoped in

EPS state: 'The land within the Scheme will be restored and returned to its original use as far as reasonably practicable after decommissioning. This will include removal of the solar PV panels, substations, conversion units and BESS.'

As this is BMV agricultural land, it should be guaranteed that the land should be returned as agricultural land of the same or better quality at decommissioning. This is supposedly the reason these schemes and land use can be categories as 'agricultural' rather than industrial - that they improve soil quality and biodiversity, not permanently damage good agricultural land.

Compression, contamination estimates during construction and decommissioning for each site and specific equipment to be installed on that site should be provided.

Site/soil specific depth of compression at each site should be provided. Evidence from other sites with that specific type of equipment/soil.

Modelling of time for soil to recover from compression should be provided.

Modelling of long-term impacts to different grades of BMV soil should be provided.

Modelling and evidence of time for soil to recover homogeneity after decommissioning should be provided.

Length of time for soil to return to previous agricultural grade after decommissioning should be provided. Guarantee of return of soil to at least previous BMV grade should be provided.

Quantity, locations and contamination impact of cement/concrete on soil should be provided.

Risk assessment of developing site with historic PFAS contamination (eg. on and adjacent to the three former RAF airbases: Tibenham, Seething and Hardwick).

Liability for remediation of historic contaminated land disturbed by physical works during construction. Who will bear the liability and be responsible for remediation?

Materials of metal mountings, method and depth of installation, leeching/weathering impacts on soil should be provided for each specific site.

Leeching reports for all equipment/materials to be installed should be provided.

Contamination implications of weathering, microcracking and damage to panels on soil contamination should be provided.

Weathering and deterioration impacts of other equipment on soil should be provided.

Estimates of breakage of panels on transit and installation should be provided.

Breakage of panels due to weather events- storms, hail, debris falling on to panels, bird strikes should be addressed

PFOS/PFAS from underground cables. Long term impacts of leaving them in the soil should be addressed

Continuing soil monitoring should be undertaken and a plan and funding provided.

Impact of silt at each site should be assessed.

Modelling of soil contaminants from site, specifically lead and PFAS, on future crop growth on those sites, and also surrounding agricultural land should be assessed

Impact on the soil beneath the panels if the minimum height is 0.4m. Sheep will be unable to graze beneath panels, how will the soil therefore regenerate? There will not be improvements to soil quality on these areas.

‘New internal access tracks are likely to be a maximum of 6m wide, constructed of hardcore or gravel over a levelling layer of substrate.’ How do they propose to decontaminate this land and return it to agricultural use?

There is insufficient consideration for building new roads on sites capable of carrying and turning articulated lorries and storage of materials. Also, there is an unrealistic understanding of the potential for access from minor country roads without damaging verges. For example, Fairstead Lane (access to site 7) is too narrow to carry vehicles of the dimensions they specify.

Ground conditions should be scoped in

Given the highly likely existence of unexploded ordnance on both sites 3a and 3b (3b was the former heavy bomb dump for RAF Hardwick) and site 10, and the acknowledged contamination risks of all three former RAF airbase sites, ground conditions should be scoped in. It has recently come to light that there is significant PFAS contamination associated with the soils and ground water of former RAF bases,[31] with residents who have been using private water supplies associated with those sites requiring blood-letting to reduce the PFAS concentrations in their blood.[32] The PFAS contamination is associated with firefighting foams, which were used at airforce bases, including during WWII for firefighting.

Since the East Pye Solar Scheme adjoins three former RAF bases at Seething, Hardwick and Tibenham, it is important to fully assess the baseline levels of ground and water contamination from PFAS in these areas. It is also important to assess the likelihood of releasing any kind of historic contaminants into the soil by pile driving 4m below the plough line. The implications for underlying aquifers also need to be assessed.

There should also be an assessment of the impact of PFAS coatings and backings from the solar panels adding to this contamination. The long-term implications for these agricultural sites, surrounding areas and any future crop growth should be fully assessed.

Environmental

NPS EN-5 'Environmental and Biodiversity Net Gain' section 2.5 has not been followed. Biodiversity Net Gain (BNG) is an approach that aims to leave the natural environment in a better state than it was before. The BNG process requires developers to plan into their project increases in natural habitats and ecological features.

EN-1 This ES has not addressed assessment principles and generic impacts and should be rewritten.

Insufficient research has been carried out on biodiversity and the impacts of utility-scale solar.

Mitigation measures must be specific and aligned to identify all of the Environmental and biodiversity losses.

[31] 'Forever chemical' hotspots revealed to include RAF bases and airports | The Independent
[32] Bloodletting recommended for Jersey residents after PFAS contamination | Jersey | The Guardian

Environmental impact to common species should be scoped in



Due to the scale of this scheme across such a large expanse of the landscape, its impact on common wildlife should also be scoped in.

This is an area of ancient woodland with herds of red, roe and muntjac deer. It is a core woodland area and part of the UK Woodland Network for Biodiversity, which aims to allow the free migration of species across the landscape to enable genetic diversity. The impact of this extent of deer-fencing on the landscape and especially on deer and hares should be scoped in. Impact on common animals' ability to freely cross the landscape, mate and feed should be scoped in. With a project covering this extent of the landscape there is a significant concern that wildlife will be forced on to roads.

EPS states: 'Applicants should aim to minimise the use and height of security fencing. Where possible applicants should use existing features, such as hedges or landscaping.'[33] This is currently being ignored and should be enforced.

The impact of this scheme across the whole ecosystem should be properly quantified.

Wintering/Passerine birds should be scoped in



Several of the proposed land parcels are currently in the Countryside Stewardship Scheme for the protection of farm assemblage birds, specifically lapwing. There is no current effective mitigation for lapwing, which are a ground nesting species. The impact of this scheme to passerine birds should be scoped in, as it is likely to have significant effects on them.

Otters should be scoped in

The area is within three miles of the Broads Authority and has tributaries of the river Yare. It is therefore likely that otters may be present in the areas impacted by the scheme.

[33] 2.10.132

Lighting

Lighting should be scoped in as a separate topic because most of the countryside covered by these proposals is located in an area of Rural Dark Landscape as defined in Norfolk County Council's Environmental Lighting Zones Policy. Residents and visitors alike appreciate the local rural dark landscape and dark skies. The impact of any form of night-time artificial lighting on these treasured assets, ecology and residential amenity needs to be fully assessed.

Impacts of any lighting employed during the construction phase, on flora, fauna, dark skies, dark landscapes and residential amenity should be scoped in

'3.8.5 Temporary on-site lighting will be required during construction to enable safe working in hours of darkness'. The proposed working hours are between 7am and 6pm weekdays and Saturday mornings. In winter it is dark until 8am and after 4pm. There will be at least three hours of artificial lighting five days per week during the winter months. Many of the proposed sites are adjacent to woodland or locations with significant bat and owl populations. The impacts of temporary lighting of this scale on wildlife should be scoped in.

Impacts of any lighting employed during the 40 to 60 years operational period, on flora, fauna, dark skies, dark landscapes and residential amenity should be scoped in

'Motion sensing security lighting will be provided within the Substations, ancillary infrastructure and within the BESS for security and maintenance purposes, during hours of darkness.'

There is recorded barbastelle bat activity around the proposed BESS site. The impact of permanent motion-sensor lighting on the ability of creatures to rest, breed or feed should be scoped into the assessment.

Impact of decommissioning on any Biodiversity Net Gain should be scoped in

The impact of decommissioning and return to agriculture on any BNG gain during operation should be scoped in. Will any biodiversity net gain remain after decommissioning?

Water and Flooding should be scoped in

Private water supplies and drinking water should be scoped in

EPS must gather data on the number, types and locations of all private water supplies within 1KM of every proposed site or cable corridor.

EPS says at 5.3.7 'The Site and CRC are not located within any Drinking Water Protected Areas (surface water) or Drinking Water Safeguard Zones (both surface and groundwaters), with the exception of sub-Site 3A which is covered by a Drinking Water Safeguard Zone for surface water.' This is incorrect even by their own assessment which also identifies drinking water safeguard zones at site 1.

EPS identifies Impact pathways during the construction, operational and decommissioning phases to include the following:

- impacts on water quality from sediment/pollutant mobilisation, contamination from potential harmful materials (e.g. lead, lithium and other heavy metals) from solar panels/batteries during construction and decommissioning.
- impacts on local water supplies/groundwater from spills during construction and decommissioning; and
- impacts on water quantity/surface water runoff from increases in impermeable areas during operation

The EPS document says: 'potentially contaminated soils (if present) may be disturbed during the construction and decommissioning phases as a result of construction and decommissioning works, and during the operational phase as a result of in-ground maintenance works. Such disturbance could impact human health.' This will have an impact on private drinking water supplies, and also drinking water for farm animals and wildlife.

EPS say mountings are to be driven up to 4m into the ground – impact on aquifers should be scoped in.

Leeching impact of specific proposed equipment on ground water should be scoped in.

Damage, microcracking, leeching impact of equipment on drinking water quality.

Impact on drinking water protection zones of concrete, PFAS, galvanised metal and other toxins from panels.[34]

Impact of altered run-off and silt on specific nearby wells and boreholes, pumps and filtering equipment

Continuous monitoring of potential contamination of drinking water. This is a significant public health issue. Contamination of concrete and plastic-coated cables in perpetuity on

[34] rsc-policy-position-on-pfas-in-uk-drinking-water.pdf

ground water, aquifers and drinking water supply. Particularly implications of PFAS solar panel backings and coatings - 'the asbestos of the future'[35] (International Society for Chemistry).

Flooding should be scoped in

'5.3.21 In summary, the Site and CRC are considered to have a 'Very Low' to 'Low' flood risk from all sources.' The flooding information provided is incorrect, as evidenced by the photograph of Long Stratton to the right. There were significant floods across the whole site in 2020 and 2023, during which times many of the major access routes EPS plan to use were impassible in multiple locations.[36] December 2024 Fairstead Lane was flooded and impassible.



Impact of run-off particularly on areas already prone to flooding should be scoped in. It should also be scoped in for areas on slopes, such as site 8 in Shotesham, and assessments of impact made during all part of the year due to varying ground conditions.

The Environment Agency advise for this project: 'We recommend that solar panels and their infrastructure are not located within flood zones because there is potential for flood velocity and flood storage volumes to be affected by the panel support structures (legs and any associated bases) and any related infrastructure/buildings. Should flood velocity slow as a result of this, there is the possibility of flood water backing up and increasing flood risk elsewhere, especially upstream. Compensatory flood storage or hydraulic modelling can be required for solar farms within flood zones. There is also a risk of debris being caught up in the solar panel support structures or solar panels themselves as a result of flooding. The possibility of the solar panels becoming dislodged by flood water should also be investigated as they could pose a blockage risk downstream, especially to culverts.

In order to have fully considered all forms of flooding and their influence on the site, it will be necessary to identify the flood risk. It may be appropriate to undertake some flow analysis such at Flood Estimation Handbook and 1D modelling to establish the level. Any revised FRA for planning purposes will need to consider the source of flooding and demonstrate appropriate mitigation against fluvial flood risk.

We advise that modelling should be undertaken to accurately establish the risk to the proposed development in terms of potential depths and locations of flooding. The

[35] PFAS: The New Asbestos? - Environmental Law - United Kingdom Insurance Risks from PFAS - Per- and Polyfluoroalkyl Substances - Hannover Re

[36] PICTURES: Firefighters called to numerous flooding incidents in and around Diss
Norfolk fire service declare flash floods a 'major incident' - BBC News
Major roads in Norfolk underwater after heavy downpours | Eastern Daily Press

watercourse should be modelled in a range of return period events, including the 1 in 20, 1 in 100 and 1 in 1000 year events, both with and without the addition of climate change. The flood levels on the development site should be determined and compared to a topographic site survey to determine the flood depths and extents across the site.

We would recommend that FRAs at all levels should be undertaken under the supervision of an experienced flood risk management specialist (who would normally be expected to have achieved chartered status with a relevant professional body such as the Institution of Civil Engineers (ICE) or the Chartered Institution of Water and Environmental Management (CIWEM)).'[37]

Arboricultural should be scoped in

This is an area with a significant number of ancient hedgerows and trees of significance. They provide an important resource and habitat for wildlife. Unfortunately, we have already witnessed (photographic evidence) of landowners grubbing up ancient hedgerows last March during nesting season in advance of the environmental assessments for this project. We also have evidence of large numbers of hedgerows this winter being cut down to below a meter in height in advance of environmental surveys.

Due to the massive impact on the landscape of the cable corridors and associated infrastructure, there should be full surveys and impact assessments of all hedgerows and trees in all cable corridors and every site.

It is not acceptable to replace mature hedging and trees with new planting as mitigation.

Details of vegetation management plan including spraying and their impacts should be scoped in.

All socio-economic impacts should be scoped in

Section 5.11 East Pye Solar has explicitly stated that this project will bring no benefit to impacted residents, their communities or the people of Norfolk, either in terms of skills, employment, amenity nor even electricity. The only people benefitting are the handful of individual farmers involved in the scheme.

Employment and income should be scoped in

Impacts to tourism and businesses have been completely ignored.[38]

[37] Email from Environment Agency 4 Feb, 2025.
[38] East Pye Solar EIA Scoping document, Table 5.8

EPS have already been informed that there are businesses directly impacted by this scheme that would be unviable to open, either during the construction or decommissioning phases as well as made potentially permanently unviable due to the siting of this project and its impact on tourism.

As we are only two miles from the Broads National Park and also close to the coast, we have a thriving tourist industry in South Norfolk, with many people coming to stay in holiday lets and Airbnbs for weekend breaks or summer holidays.

East Pye Solar have not provided any lists of local businesses impacted in their scoping report other than Norfolk Gliding Club. Loss of employment and income for those who own holiday lets, Airbnb properties, who run events, own farm shops or restaurants is a significant factor of this project and should be scoped in. East Pye Solar are familiar with impact statements from our residents, including this one published in the national press:

'Roy and Heidi Martin have spent the last three years converting their disused barn into two immaculate holiday lets overlooking fields that will be filled with panels. Roy believes their business will be completely unviable. "People come here for a quiet retreat. It's the last thing they are going to want," he says. "I've put everything into this – my life savings, two years of every penny I could earn, and what are we going to be left with?" he says.'[39]

Socio-economic impacts should also be assessed as a cumulative impact in light of the other proposed solar projects locally. The permanent impact to tourism businesses should also be assessed if all proposed solar projects in the area go ahead and the landscape is industrialised for the next 60 years.

Construction activities are likely to be carried out Monday to Friday 07:00-18:00 and between 08:00 and 13:30 on Saturdays, which means there will be a significant impact on restaurants, tourism and holiday lets, preventing some from being able to trade at all due to construction disturbance, noise and vibration.

Economic impact to homeowners should be scoped in

There should also be an assessment of the impact to homeowners' abilities to continue to insure their properties and any increase to insurance premiums as a result of being sited near to BESS infrastructure, substations or areas where there is likely to be any higher risk of flooding due to the scheme.

[39] 'People Versus Power', *The Observer*, 29 December 2024. Solar farms v people power: the locals fighting for their county | Solar power | The Guardian

The site plan shows that the landowners and EPS have chosen to site infrastructure surrounding private homes, placed it immediately behind them, or directly in front of them. Local residents have been advised by estate agents that the most severely impacted homes have already lost 30% of their value from the time this project was announced. It is now not possible for homeowners to sell their homes until the project is either rejected or built and the true impact to their properties is known. Many families are threatened with being put into negative equity due to this scheme, as reported in *The Observer*:

'A local estate agent has suggested that the value of the worst-impacted houses could fall by 30%. If that happens, Chris and Jenna Humphrey will be in negative equity, their mortgage will be larger than their house's value. A 2023 peer-reviewed study found that UK house values dropped by an average of 10.2% if less than 750m south of installations greater than 10MW (properties to the south may be more affected because of panel glare), but they will be 50m away.' [40]

Others find themselves in financially ruinous situations having bought Listed Buildings from farmers involved in the scheme only to discover that they have placed solar fields directly beside them – making the properties now worth substantially less than it would cost to restore them.

Other landowners have chosen to site hundreds of acres of industrial solar infrastructure directly in front of holiday lets making them worthless and unviable as businesses. No compensation has been offered to any of these home or business owners. There has been no suggestion that other fields will be substituted to the scheme to avoid these severe impacts. This has had a significant impact on the mental health of the individual homeowners and that of the whole community, who witness this injustice.

The socio-economic impacts of this scheme must absolutely be scoped in. The cumulative socio-economic impacts of the other solar NSIP schemes that also have TEC grid connections agreed in the Long Stratton/Gissing area should also be scoped in as if all were to go ahead, it would have a major impact on property prices locally and tourism businesses. It is completely wrong that family finances and security should be jeopardised by a scheme that benefits only a foreign corporation and a handful of individual landowners.

Due to the proximity of homes and tourism businesses to all of the proposed sites, all aspects of noise and vibration suggested to be scoped out in the table below should be

[40] 'People Versus Power', *The Observer*, 29 December 2024. Solar farms v people power: the locals fighting for their county | Solar power | The Guardian

scoped into the EIA

11.10 Summary

11.10.1 **Table 11.11** provides a summary of the noise and vibration scope.

Table 11.11: Summary of Scope for Noise and Vibration

Discipline	Scoped In Elements	Scoped Out Elements
Noise and Vibration	Construction traffic noise Construction noise Construction vibration Operational noise from BESS, substations, inverters and transformers Operational traffic noise	Construction, operational and decommissioning traffic vibration Operational vibration Operational noise and vibration from panels Operational noise and vibration from cable route corridor Decommissioning noise Decommissioning vibration

Section specifically on BESS Site/Substration & Grid Connection Infrastructure, Sites 1A, 1B, 2A, 2B, 2C

Extracts from the EP.

2 Site Description

BESS Site & Proposed Grid Infrastructure Site

3.7 Battery Energy Storage System

2.13.1 The potential siting of the BESS Site is adjacent to sub-Site 1B, separated by Hundred Lane. The BESS Site comprises an agricultural field bordered by lines of trees and hedgerows, and a small pocket of woodland along part of its western boundary. Great Moulton is located 1.1km north, and Sneath Common is located 1.1km west.

2.13.2 The BESS Site is a total of 22ha. The BESS Site will also accommodate 400kV Substation 1. However, the infrastructure associated with the BESS and 400kV Substation 1 is unlikely to utilise this entire space in order to allow for emergency vehicle access

3.7.1 A BESS provides an important balancing service, allowing electricity generated by the panels to be stored at times of low demand, and then exported onto the system when demand increases. The BESS will therefore enhance grid reliability and resilience. The BESS will have a capacity of up to 500MW.

3.7.2 The BESS will incorporate heating, ventilation and cooling systems to ensure the efficiency of the technology. These features are integrated into the units within which they are housed. The battery system will comprise DC/AC inverters to control the charge of the batteries from either the solar PV energy output or when drawing energy from the grid

3.16.1 The components of the Scheme are anticipated to have the following approximate lifespans: Photovoltaic Panels – 25-40 years; and Batteries – 15-20 years. 3.16.2 3.16.3 It is therefore assumed, that the solar panels could require replacement up to two times and the batteries up to four times during the operation of the Scheme. The environmental implications of the replacement of the solar PV panels and BESS will be considered within the assessment of operational impacts of the Scheme in the ES. The construction phase is therefore considered as a worst-case scenario for the panel and battery replacement scenario, with any impacts likely to be much less than those reported during construction.

NPS EN-5 'Environmental and Biodiversity Net Gain' Section 2.5, has not been followed.

EN-1 This ES has not addressed assessment principles and generic impacts and should be rewritten.

The following topics must be scoped back into the ES from evidence BEPS have seen. Water Environment; Glint and Glare; Waste and Materials; Socio-Economics; Human Health; Ground conditions.

2.14.1 The proposed National Grid Substation is proposed to be located at the National Grid Substation Site (see Figure 1.2 Sheet 13 of 13). This section of the report describes the site characteristics of the National Grid Substation Site. Subject to on-going discussions with National Grid, an alternative location for the Substation, is potentially within part of sub-Site 1B (the characteristics of sub-Site 1B are described above) (shown on Figure 1.2). The potential for the National Grid Substation to be located at the National Grid Substation Site and part of sub-Site 1B are both addressed in this Scoping Report.

The applicant has not provided any details of size or visualization of the National Grid Substation as stated in the scoping document, therefore this should be rewritten to provide comprehensive details on this National Grid Substation, including essential visualizations to demonstrate its impact on Great Moulton Plateau, visual effects, and nearby residential areas in addition the impacts covered in NPS EN-1, Biodiversity and Geological Conservation; Landscape and Visual Impact; Undergrounding and subsea cables"

Site 2 – Alternative Location for the National Grid Substation

EP extract

2.3.1 Site 1 is 56ha in size comprising two adjacent land parcels, sub-Site 1A and sub-Site 1B immediately to the east. Site 1 is located at the southern extent of the Scheme boundary, 170m south-west of Great Moulton, and immediately to the north of the BESS Site (see Figure 1.2 Sheet 2 of 13).

2.3.2 Sub-Site 1A comprises one agricultural field and sub-Site 1B encompasses four fields. Part of sub-Site 1B has the potential to accommodate the National Grid Substation. Whilst the National Grid Substation is likely to be located at the National Grid Substation Site as discussed at Section 2.14 of this Chapter, this is subject to on-going discussions with National Grid.

2.14.1 The proposed National Grid Substation is proposed to be located at the National Grid Substation Site (see Figure 1.2 Sheet 13 of 13). This section of the report describes the site characteristics of the National Grid Substation Site. Subject to on-going discussions with National Grid, an alternative location for the Substation, is potentially within part of sub-Site 1B (the characteristics of sub-Site 1B are described above) (shown on Figure 1.2). The potential for the National Grid Substation to be located at the National Grid Substation Site and part of sub-Site 1B are both addressed in this Scoping Report.

The applicant has not provided any details of size or visualization of the National Grid Substation as stated in the scoping document, therefore this should be rewritten to provide comprehensive details on this National Grid Substation, including essential visualizations to demonstrate its impact on Great Moulton Plateau, visual effects, and nearby residential areas in addition the impacts covered in NPS EN-1, Biodiversity and Geological Conservation; Landscape and Visual Impact; Undergrounding and subsea cables"

"3.6.7-3.6.12 "The applicant has not addressed the potential of this in any detail, the scoping report has totally unmined the importance of this part of the scheme. There is no visualization of the components of the scheme therefore diluting the enormous impact this will have on the countryside. 34 Planning Inspectorate (2024) Nationally Significant Infrastructure Projects: Commitments Register. Available at: https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-commitments-register

National Grid Substation Site (including Grid Connection Infrastructure)

EP extract

National Grid Substation and Grid Connection Infrastructure - Achieving good design

Achieving good design requires a holistic approach to deliver high quality, sustainable infrastructure that responds to place and takes account of often complex environments. Good design is not primarily about how infrastructure looks, although these considerations (the aesthetics) are important. Nationally Significant Infrastructure Projects: Advice on Good Design - GOV.UK

3.6.11 The details of the National Grid Substation and Grid Connection Infrastructure will be refined throughout the progression of the Scheme through PEIR and EP and ongoing engagement with National Grid Electricity Transmission plc.

3.6.12 The National Grid Substation will be constructed, operated and maintained by National Grid. This is in accordance with the Electricity Act 1989 that specifies that operators should develop and maintain an efficient, coordinated, and economical electricity transmission/distribution system, and includes required specifications.

“Applicants must provide comprehensive details on this National Grid Substation, including essential visualizations to demonstrate its impact on Great Moulton Plateau, visual effects, and nearby residential areas in addition the impacts covered in NPS EN-1, Biodiversity and Geological Conservation; Landscape and Visual Impact; Undergrounding and subsea cables”

*Noise and Vibration, Electric and Magnetic Fields (EMFs) and Sulphur Hexafluoride”*333101211 43 January 2025 “

5.10.23 As detailed in Chapter 3 Scheme Description, all infrastructure will be removed upon end of life with the exception of the National Grid Substation, which will remain in situ. The underground cabling can be removed from the joint bays for recycling. However, the underground cabling ducting will be decommissioned in accordance with the latest regulations and good practice prevailing at that time and are anticipated to be left in-situ.

The following should be scoped back in

EP Extract

7.2.3 On this basis it is considered that there is limited potential for likely significant landscape or visual effects resulting from the Scheme to occur beyond 2km from each individual Site or sub-Site boundary (including the BESS), and the CRC. This judgement has been derived from professional experience of the nature of effects of solar farm developments. It takes into account the limited height of the solar panel and BESS elements, together with site characteristics, namely the generally flat topography within the landscape surrounding the Site. The presence of field boundary vegetation and woodland blocks within and adjacent to the individual Sites serve to provide screening and restrict visibility

EN-1 sets out assessment principles and generic impacts that an ES should address, and any specific considerations for applications. This includes a reference at paragraph 4.3.20 that the SoS should have regard to the ambitions, goals and targets set out in the Government's Environmental Improvement Plan 2023 for improving the natural environment and heritage. This includes having regard to the achievement of statutory targets set under the Environment Act 2021.

NPS EN-5 includes a section on 'Environmental and Biodiversity Net Gain' at Section 2.5, which states: "When planning and evaluating the proposed development's contribution to environmental and biodiversity net gain, it will be important – for both the applicant and the Secretary of State – to supplement the generic guidance set out in EN-1 (Section 4.6) with recognition that the linear nature of electricity networks infrastructure can allow for excellent opportunities to: i. ii. reconnect important habitats via green corridors, biodiversity stepping zones, and reestablishment of appropriate hedgerows; and/or connect people to the ii. reconnect important habitats via green corridors, biodiversity stepping zones, and reestablishment of appropriate hedgerows; and/or connect people to the environment, for instance via footpaths and cycleways constructed in tandem with environmental enhancements" Section 2.9 of EN-5 concerns the relevant impacts which applicants must provide information on in addition to those impacts covered in NPS EN-1, being: Biodiversity and Geological Conservation; Landscape and Visual Impact; Undergrounding and subsea cables, Noise and Vibration, Electric and Magnetic Fields (EMFs) and Sulphur Hexafluoride.

An Approach to Landscape Character Assessment - GOV.UK
LUC_2001_RPA_E2_Great_Moulton_Plateau"

Decommissioning The National Grid Substation

7.3 Overview of Legislation, Policy and Guidance

88 Department for Energy Security & Net Zero (2023), *Overarching National Policy Statement for Energy (EN-1).* Available at: overarching-nps-for-energy-en1.pdf https://www.landscapeinstitute.org/publication/tgn-02-21-assessing-landscape-value-outside-national-designations/Accessed Nov 24 set out the Government's policy for delivery of major energy infrastructure and is the primary basis for decision making relating to energy projects.

The following paragraphs from NPS EN-1 Chapter 5.10 Landscape and Visual, as well as the landscapeinstitute.org/publication/tgn-02-21-assessing-landscape-value-outside-national-designations, are pertinent to the scheme covering Great Moulton for the BESS and Grid Infrastructure installations.

EN-1 This EP has not addressed assessment principles and generic impacts and should be rewritten.

BESS health and safety considerations. It is our understanding that a large scale BESS fire would not be tackled by the local fire service, instead it would be allowed to "burn out". This would require it being placed further away than 100m from any people and the recommendations as contained in Grid Scale Battery Energy Storage System planning – Guidance for FRS

The following should be scoped in

- recommendations as contained in Grid Scale Battery Energy Storage System planning – Guidance for FRS
- Emission modelling should take account of foreseeable scenarios, including thermal runaways in single and multiple containers.
- Means to retain and treat the large volume of water required to contain a thermal runaway should be secured in the DCO
- Degradation of water in the case of significant Incidents in the case of a Battery Fire.

Measures will be incorporated within the LEMP to soften and screen views of the Scheme. There are no details of this and if that's the precise it should comply with footpaths and Bridleways as well as roads.

2.10.132: "Applicants should aim to minimise the use and height of security fencing. Where possible applicants should utilise existing features, such as hedges or landscaping. This is being ignored and should be enforced

The applicant should assess the impacts on, and loss of, all trees and woodlands within the project boundary and develop mitigation measures to minimise adverse impacts and any risk of net deforestation as a result of the scheme. Mitigation may include, but is not limited to,

the use of buffers to enhance resilience, improvements to connectivity, and improved woodland management."

Visualisations may be required to demonstrate the effects of a solar farm on the setting of heritage assets and any nearby residential areas

Extracts from the EP.

11.3.4 The Overarching National Policy Statement (NPS) for Energy (EN-1)184 recognises that noise and vibration from energy development can have impacts on the quality of human life as well as on wildlife in some cases.

11.3.6 The NPS for Electricity Networks Infrastructure (EN-5)186 sets out specific considerations which apply to electricity network infrastructure. NPS EN 5 notes the potential for high voltage transmission lines in certain conditions, substation equipment such as transformers and other voltage regulation equipment to produce noise.

11.3.7 The Noise Policy Statement for England (NPSE)187 and National Planning Policy Framework (NPPF)188 include general planning guidance on noise and introduces the principles of adverse noise effects (which should be mitigated and reduced to a minimum) and significant adverse noise effects (which should be avoided). The NPPF also notes that tranquil areas which have remained relatively undisturbed by noise, and which are prized for their recreational and amenity value should be identified and protected.

From:	Completionpacks
To:	East Pye Solar; Completionpacks
Subject:	RE: EN0110014 East Pye Solar - EIA Scoping Notification and Consultation
Date:	28 January 2025 14:27:34
Attachments:	image001.jpg image002.png image003.png image004.png image005.png image006.png image007.png image008.jpg

---

Hi,

I can confirm that Indigo are not affected by these works

Thank you
Laura

Laura Collier| Asset Engagement officer

Indigo Networks
E: [redacted]@indigonetworks.co.uk
T: [redacted]

A close-up of a logo Description automatically generated

Follow us on Linkedin

From: East Pye Solar <eastpyesolar@planninginspectorate.gov.uk>
Sent: Monday, January 27, 2025 11:55 AM
To: Completionpacks <completionpacks@indigonetworks.co.uk>
Subject: RE: EN0110014 East Pye Solar - EIA Scoping Notification and Consultation

> You don't often get email from eastpyesolar@planninginspectorate.gov.uk. Learn why this is important

Hi Laura,

Apologies for the delay in getting back to you.

These coordinates are based roughly on the centre point of the entire site:

Easting: 623691
Northing: 294133

Post Code: NR15 2NE

Further details on the site can be requested directly from the Applicant via the email address provided in the letter.

Hope this helps.

Kind regards,

Joseph Jones

Joseph Jones
EIA Advisor
The Planning Inspectorate
T 0303 444 5028

@PINSgov The Planning Inspectorate planninginspectorate.gov.uk

Ensuring **fairness**, **openness** and **impartiality** across all our services

This communication does not constitute legal advice.
Please view our Information Charter before sending information to the Planning Inspectorate.
Our Customer Privacy Notice sets out how we handle personal data in accordance with the law.

From: Completionpacks <completionpacks@indigonetworks.co.uk>
Sent: Wednesday, January 22, 2025 11:17 AM
To: East Pye Solar <eastpyesolar@planninginspectorate.gov.uk>
Cc: Completionpacks <completionpacks@indigonetworks.co.uk>
Subject: RE: EN0110014 East Pye Solar - EIA Scoping Notification and Consultation

Hi,

Can you please provide coordinates and postcode to enable us to check our systems ?

Thank you
Laura

Laura Collier| Asset Engagement officer

Indigo Networks
E: [redacted]r@indigonetworks.co.uk
T: [redacted]

A close-up of a logo Description automatically generated

Follow us on Linkedin

From: East Pye Solar <eastpyesolar@planninginspectorate.gov.uk>
Sent: Wednesday, January 15, 2025 3:55 PM
Subject: EN0110014 East Pye Solar - EIA Scoping Notification and Consultation

> You don't often get email from eastpyesolar@planninginspectorate.gov.uk. Learn why this is important

Dear Sir/Madam

Please see attached correspondence on the proposed East Pye Solar.

The Applicant for the Proposed Development intends to make an application for Development Consent under the Planning Act 2008. The Applicant has sought a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.

The Planning Inspectorate has identified you as a consultation body to inform the Scoping Opinion and is therefore inviting you to submit comments by 12 February 2025. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Kind regards,

Joseph Jones

Joseph Jones
EIA Advisor
The Planning Inspectorate
T 0303 444 5028

@PINSgov The Planning Inspectorate planninginspectorate.gov.uk

Ensuring **fairness**, **openness** and **impartiality** across all our services

This communication does not constitute legal advice.
Please view our Information Charter before sending information to the Planning Inspectorate.
Our Customer Privacy Notice sets out how we handle personal data in accordance with the law.

Please take a moment to review the **Planning Inspectorate's Privacy Notice** which can be accessed by clicking this link.

Please note that the contents of this email and any attachments are privileged and/or confidential and intended solely for the use of the intended recipient. If you are not the

intended recipient of this email and its attachments, you must take no action based upon them, nor must you copy or show them to anyone. Please contact the sender if you believe you have received this email in error and then delete this email from your system.

Recipients should note that e-mail traffic on Planning Inspectorate systems is subject to monitoring, recording and auditing to secure the effective operation of the system and for other lawful purposes. The Planning Inspectorate has taken steps to keep this e-mail and any attachments free from viruses. It accepts no liability for any loss or damage caused as a result of any virus being passed on. It is the responsibility of the recipient to perform all necessary checks.

The statements expressed in this e-mail are personal and do not necessarily reflect the opinions or policies of the Inspectorate.

DPC:76616c646f72



Please take a moment to review the **Planning Inspectorate's Privacy Notice** which can be accessed by clicking this link.

East Pye Solar Project

Environmental Impact Assessment (EIA) Scoping Report

Date: January 2025

PINS Reference: EN0110014

Response submitted by Morningthorpe and Fritton Parish Council

Morningthorpe and Fritton support and endorse this joint statement.

The area proposed to site the East Pye Solar utility-scale power plant is a valued, tranquil and unspoilt agricultural landscape of small Domesday Book villages, hamlets and isolated farmsteads with dark skies and a unique biodiversity (South Norfolk Claylands), including maternity roosts of critically endangered barbastelle bats in multiple locations. It has many village conservation areas, Grade I Listed churches, and a nationally significant collection of Grade II* and Grade II Listed medieval farmsteads. These building 'are of great historic and architectural interest and form one of the most widespread and impressive survivals of pre1750 farmstead buildings'.[1]

East Pye Solar admit they are unable to list all the Grade II Listed buildings impacted by this scheme beyond 100m - they have had to create an entire separate volume, because there are simply too many of them. The landscape has associations with the Norwich painter John Crome and Sir Alfred Munnings, and many of the buildings affected by this scheme are listed in Pevsner's *Buildings of England* (first published 1962). This is indicative of the value of this landscape and its cultural heritage and demonstrates that this utility-scale power plant project, stretching across some 15KM of our landscape is entirely inappropriate for this location.

1

Morningthorpe & Fritton will be directly impacted by sites 5and 5Band potentially by the BSS site. After significant representations from residents and a vote by the Parish Council it was agreed that Morningthorpe and Fritton Parish Council are opposed to this development in its current scoping description.

We have been omitted from the scoping description and replaced by Hempnal as the closet residential settlement. Although the identified areas fall within the boundaries of Morningthorpe and Fritton Parish and directly affect its residents.

Specifically for the sites identified above the following points should be noted and require further clarification and full scoping inclusion.

Using the terms “likely to be proposed” when describing possible sub stations does not allow an assessment of the proposal or the ability to assess the impact on the Landscape, Ecology/Biodiversity, noise, Electric, Magnetic and Electromagnetic Fields, and other factors. It raises more questions on the suitability of the position within the area (Site 5) hindering the ability to assess even at scoping stages the consultation process on behalf of the residents and the Parish Council alike.

The volume and size of a 400kV installation is of significant size to impact the area on many counts and it is not acceptable to identify the area but omit further details so that the impact can be assessed or committed on.

Scoping out key and significant categories is not acceptable as they will have impact on the community, environment and general wellbeing of the identified areas and beyond. We would request that these areas are included and not allowed to be scoped out by East Pye Solar.

Areas East Pye Solar have requested to scope out: -

- Air Quality
- Water Environment
- Major Accidents and Disasters
- Electric, Magnetic and Electromagnetic Fields
- Telecommunications, Television Reception and Utilities
- Wind Microclimate
- Daylight, Sunlight and Overshadowing
- Glint and Glare
- Lighting
- Minerals
- Waste and Materials
- Socioeconomics
- Human Health
- Arboriculture; and
- Ground Conditions

The Parish Council consider these areas to be vital in the assessment of the impacts this proposal would or could have on the Parish and beyond whilst also considering them essential for inclusion moving forward. Cherry picking and omitting areas of major concern is not acceptable.

The Parish Council consider it completely unacceptable to allow the development of potentially 4.5m high Solar panels to surround one property within the Parish on three sides (Clay Cottage, The Street Fritton) a situation that no one could consider reasonable or acceptable on any level. The impact on this young family is devastating and will have economic, social and health implications if allowed to proceed. We urgently ask that consideration is given to this particular location as it appears to be the only residential property on the whole multi-site proposal that is impacted to this unacceptable level.

The proximity of the development to The Grade 1 St Catherines Church is also not acceptable as this will seriously impact on the vistas and views of this historic site flanking the church along one boundary.

BESS site will be 500Mw, The Parish Council has serious concerns with regard to safety and potential harm that residents could expect if the site was subject to an explosion or compromise of the integrity of the battery storage.

This is of further serious concern when the scoping document does not consider that would constitute a major incident. Consultation with Norfolk Fire & Rescue Service would need to take place and risk assessments, emergency plans and evacuation plans submitted and agreed between services, organisations and public consultation.

National Gas House
Warwick Technology Park
Gallows Hill, Warwick
CV34 6DA

+44 (0) 1926 65 3000
nationalgas.com

Submitted via email to: eastpyesolar@planninginspectorate.gov.uk

10th February 2025

Dear Sir/Madam,

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11

Application by East Pye Solar Ltd (the Applicant) for an Order granting Development Consent for the East Pye Solar Project (the Proposed Development)

I refer to your email dated 15/01/2025 regarding the above proposed DCO. This is a response on behalf of National Gas Transmission (NGT). Having reviewed the scoping consultation documents, NGT wishes to make the following comments regarding gas infrastructure which may be affected by proposals.

NGT has 1 feeder main located within or in proximity to the Order limits. Details of this infrastructure is as follows:

- Feeder Main – FM05 – Yelverton to Stowmarket
- National Gas Freehold – NK391851
- National Gas Freehold – NK137237
- Cathodic Protection Groundbeds/TR
- Ancillary apparatus

Please note that NGT has existing easements for these pipelines which provides rights for ongoing access and prevents the erection of permanent / temporary buildings/structures, change to existing ground levels or storage of materials etc within the easement strip.

You should also be aware of NGT's guidance for working in proximity to its assets, further guidance and links are available as follows.

CATHODIC PROTECTION SYSTEM

To ensure a high level of safety and reliability in operation, National Gas Transmission's assets are protected by a cathodic protection system. It is essential that buried steel pipework associated with the transmission and distribution of natural gas is designed, installed, commissioned and maintained to withstand the potentially harmful effects of corrosion and that the corrosion control systems employed are monitored to ensure continued effectiveness. Installations in the vicinity of National Gas Transmission's assets which may potentially interfere with the cathodic protection system must be assessed and approved by National Gas Transmission, and appropriate control measures must be put in place where required.

Installations which have the potential to interfere with National Gas Transmission's Cathodic protection system include (but are not limited to):

1. High voltage cable crossings and parallelism

2. High voltage ac pylon parallelism

3. Battery Energy Storage Systems

4. Third party pipelines with cathodic protection systems

5. PV Solar arrays

Further information on D.C interference can be found in UKOPA/GPG/031 Edition C Microsoft Word - UKOPA GPG 031 DC Interference Ed 1.docx

Microsoft Word - UKOPA GPG 031 DC Interference Ed 1.docx (hold ctrl and click to access)Further information on A.C. interference can be found in UKOPA/GPG/027 UKOPA Good Practice GuideUKOPA Good Practice Guide (hold ctrl and click to access)

The safe limits for transfer voltage and impressed current that a high-pressure gas pipeline can be exposed to are outlined in T/PL/ECP/1, T/PL/ECP/2 and BS EN 50122-1. These are the safe limits for non-electrically trained personnel.

SOLAR FARMS

Please be aware of the specific guidance for developing solar farms near to gas transmission pipelines:

https://www.nationalgas.com/document/82936/download

UKOPA Good Practice Guide - Requirements for the Siting and Installation of Solar Photovoltaic (PV) Installations in the Vicinity of Buried Pipelines - UKOPA/GP/014 Edition 1

Where the Promoter intends to acquire land, extinguish rights, or interfere with any of NGT's apparatus, NGT will require appropriate protection and further discussion on the impact to its apparatus and rights including adequate Protective Provisions. A Deed of Consent will also be required for any works proposed within the easement strip.

Key Considerations:

- NGT has a Deed of Grant of Easement for each pipeline, which prevents the erection of permanent / temporary buildings, or structures, change to existing ground levels, storage of materials etc.

- Please be aware that written permission is required before any works commence within the NGT easement strip. Furthermore a Deed of Consent will be required prior to commencement of works within NGT's easement strip subject to approval by NGT's plant protection team.

- Any large installations which may result in a large population increase in the vicinity of a high pressure gas pipeline must comply with the HSE's Land Use Planning methodology, and the HSE response should be submitted to National Gas Transmission for review

- The below guidance is not exhaustive and all works in the vicinity of NGT's asset shall be subject to review and approval from NGT's plant protection team in advance of commencement of works on site.

General Notes on Pipeline Safety:

- You should be aware of the Health and Safety Executives guidance document HS(G) 47 "Avoiding Danger from Underground Services", and NGT's Dial Before You Dig Specification for Safe Working in the Vicinity of NGT Assets. There will be additional requirements dictated by NGT's plant protection team.

- NGT will also need to ensure that its pipelines remain accessible during and after completion of the works.

- Our pipelines are normally buried to a depth cover of 1.1 metres, however actual depth and position must be confirmed on site by trial hole investigation under the supervision of a NGT representative. Ground cover above our pipelines should not be reduced or increased.

- If any excavations are planned within 3 metres of NGT High Pressure Pipeline or, within 10 metres of an AGI (Above Ground Installation), or if any embankment or dredging works are proposed then the actual position and depth of the pipeline must be established on site in the presence of a NGT representative. A safe working method agreed prior to any work taking place in order to minimise the risk of damage and ensure the final depth of cover does not affect the integrity of the pipeline.

- Below are some examples of work types that have specific restrictions when being undertaken in the vicinity of gas assets therefore consultation with NGT's Plant Protection team is essential:

  - Demolition
  - Blasting
  - Piling and boring
  - Deep mining
  - Surface mineral extraction
  - Landfilling
  - Trenchless Techniques (e.g. HDD, pipe splitting, tunnelling etc.)
  - Wind turbine installation - minimum separation distance of 1.5x the mast/hub height is required, and any auxiliary installations such as cable or track crossings will require a deed of consent.
  - Solar farm installation
  - Tree planting schemes

Traffic Crossings:

- Where existing roads cannot be used, construction traffic should ONLY cross the pipeline at agreed locations.

- Permanent road crossings will require a surface load calculation, and will require a deed of consent.

- The pipeline shall be protected, at the crossing points, by temporary rafts constructed at ground level. The third party shall review ground conditions, vehicle types and crossing frequencies to determine the type and construction of the raft required.

- The type of raft shall be agreed with NGT prior to installation.

- No protective measures including the installation of concrete slab protection shall be installed over or near to the NGT pipeline without the prior permission of NGT

- NGT will need to agree the material, the dimensions and method of installation of the proposed protective measure.

- The method of installation shall be confirmed through the submission of a formal written method statement from the contractor to NGT.

- An NGT representative shall monitor any works within close proximity to the pipeline to comply with NGT specification T/SP/SSW22

New Asset Crossings:

- New assets (cables/pipelines etc) may cross the pipeline at perpendicular angle to the pipeline i.e. 90 degrees.

- The separation distance for a cable >33kV is 1000mm and pre and post energisation surveys may be required at National Gas Transmission's discretion. A risk assessment/method statement will need to be provided to, and accepted by National Gas Transmission prior to the deed of consent being agreed. Where a new asset is to cross over the pipeline a clearance distance of 0.6 metres between the crown of the pipeline and underside of the service should be maintained. If this cannot be achieved the service shall cross below the pipeline with a clearance distance of 0.6 metres.

- A new service should not be laid parallel within an easement strip

- Clearance must be at least 600mm above or below the pipeline

- An NGT representative shall approve and supervise any cable crossing of a pipeline.

- A Deed of Consent is required for any cable crossing the easement

Where the promoter intends to acquire land, extinguish rights, or interfere with any of NGT apparatus, protective provisions will be required in a form acceptable to it to be included within the DCO. NGT requests to be consulted at the earliest stages to ensure that the most appropriate protective provisions are included within the DCO application to safeguard the integrity of our apparatus and to remove the requirement for objection.

Adequate access to NGT pipelines must be maintained at all times during construction and post construction to ensure the safe operation of our network.

Yours Faithfully

Asset Protection Team

Further Safety Guidance

To download a copy of the HSE Guidance HS(G)47, please use the following link:

https://www.hse.gov.uk/pubns/books/hsg47.htm

Working Near National Gas Assets

https://www.nationalgas.com/land-and-assets/working-near-our-assets

Specification for Safe Working in the Vicinity of National Gas High Pressure Pipelines and Associated Installations

https://www.nationalgas.com/document/82951/download

Tree Planting Guidance

https://www.nationalgas.com/document/82976/download

Excavating Safely

https://www.nationalgas.com/document/82971/download

Dial Before You Dig Guidance

https://www.nationalgas.com/document/128751/download

Essential Guidance:

https://www.nationalgas.com/gas-transmission/document/82931/download

Solar Farm Guidance

https://www.nationalgas.com/document/82936/download

From: [redacted]
To: East Pye Solar
Subject: EN0110014 East Pye Solar EIA Scoping Consultation Response
Date: 20 January 2025 09:56:43

You don't often get email from [redacted]@nationalhighways.co.uk. Learn why this is important

National Highways Scoping Opinion Consultation Response

National Highways welcomes the opportunity to respond to the consultation for a Scoping Opinion for the application for Development Consent for the East Pye Solar project.

On behalf of the Secretary of State for Transport, National Highways is responsible for managing and operating a safe and efficient Strategic Road Network (SRN) under the provisions of the Infrastructure Act 2015 and is the highway authority for the Strategic Road Network (SRN). The Department for Transport (DfT) Circular 01/2022 (Strategic road network and the delivery of sustainable development) sets out how National Highways will work with developers to ensure that specific tests are met when promoting a scheme. This includes ensuring the transport impact is understood, any mitigation (or other infrastructure) is designed in accordance with the relevant standards and that environmental impacts are appraised and mitigated accordingly. In addition, National Highways are responsible for ensuring the SRN serves its purpose as a part of a national system for through traffic in accordance with Section 10 of the Highways Act 1980, and to satisfy the reasonable requirements of road safety.

National Highways have reviewed the Scoping Reports and would require the following information to be included within the Environmental Statement:

- a vision as per the Circular 01/2022,
- outline relevant National and Local Policies;
- summarise existing baseline conditions;
- provide details of the Proposed Project;
- sets out the distribution of the construction and operational traffic;
- details the construction and operational trip generation;
- identify any necessary mitigation;
- assesses the impact of local committed developments;
- Carryout a cumulative assessment for the other NSIPs and committed development that are coming through around the project area; and
- summarises the findings and provide an overall conclusion.

National Highways suggest the following documents are referenced within the policy review for the project:

- Relevant National Policy Statements;
- National Planning Policy Framework (NPPF) (2023);
- Department for Transport Planning Policy Paper (DfT Circular 01/2022); and
- National Highways 'The Strategic Road Network: Planning for the Future Guide' (2015).

In addition to the above, National Highways have the following comments to make.

National Highways consider AIL's would need to be scoped in and considered at EIA stage. National Highways would advise that the Applicant directly discusses any matters pertaining to AIL movements with the National Highways Abnormal Indivisible Loads team (AbnormalIndivisibleLoadsTeam@nationalhighways.co.uk). Increased congestion and increased journey times/distance due to road closures or diversions for abnormal load access on the receptor 'Road user' would need to be scoped in due to the cumulative impact of other developments on the SRN.

National Highways advises consideration of any committed development and their cumulative impact within the project area are outlined within the Environmental Statement and Transport Assessment.

National Highways agree with the inclusion of SRN junctions within the Study Area. Further to this, we request the Applicant to provides information on the trip distribution, providing flow diagrams which include the junctions with the SRN in the vicinity of the proposed development. If the proposed development proposes to generate an increase of 30 two-way movements or more on any junctions on the Strategic Road Network within a peak period (AM or PM), we expect a capacity assessment to be undertaken to assess the impact of the proposed trips on the affected junctions and provide mitigations, if required. Where a junction capacity assessment could potentially be required, and we ask that National Highways are consulted early during the TA scoping process to ensure impacts to the SRN (and LRN) are appropriately assessed. This will enable us to determine the severity of traffic from this development on the operation and safety of the SRN.

National Highways trusts its response provides clarification of its concerns and identify other matters which National Highways considers need to be addressed at this stage of the project. However, if you have any questions or comments regarding the contents of the letter then please do not hesitate to contact me on the details provided. National Highways looks forward to continuing positive engagement with East Pye Solar Limited Project Team as the project progresses.

Kind regards

Alice

Alice Lawman MRTPI

Spatial Planner
Operations (East) | National Highways
Woodlands | Manton Lane | Bedford | MK41 7LW
Mobile: +44[redacted]
Web: www.nationalhighways.co.uk

This email may contain information which is confidential and is intended only for use of the recipient/s named above. If you are not an intended recipient, you are hereby notified that any copying, distribution, disclosure, reliance upon or other

use of the contents of this email is strictly prohibited. If you have received this email in error, please notify the sender and destroy it.

National Highways Limited | General enquiries: 0300 123 5000 |National Traffic Operations Centre, 3 Ridgeway, Quinton Business Park, Birmingham B32 1AF | https://nationalhighways.co.uk | info@nationalhighways.co.uk

Registered in England and Wales no 9346363 | Registered Office: Bridge House, 1 Walnut Tree Close, Guildford, Surrey GU1 4LZ

Consider the environment. Please don't print this e-mail unless you really need to.

From: NATS Safeguarding
To: East Pye Solar
Subject: RE: EN0110014 East Pye Solar - EIA Scoping Notification and Consultation [SG38723]
Date: 17 January 2025 09:02:02
Attachments: ~WRD0000.jpg
image006.png
image007.png
image008.png
image009.png
image010.png
image011.png
image012.png
image013.png
image014.png
image015.png
image016.png

Our Ref: SG38723

Dear Sir/Madam

NATS operates no infrastructure within 10km of the proposal site. Accordingly it anticipates no impact from the proposal and has no comments to make on the Application or Scoping Opinion.

Yours faithfully



NATS Safeguarding

E: natssafeguarding@nats.co.uk

4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL
www.nats.co.uk



NATS Internal

From: East Pye Solar <eastpyesolar@planninginspectorate.gov.uk>
Sent: Wednesday, January 15, 2025 3:55 PM
Subject: EN0110014 East Pye Solar - EIA Scoping Notification and Consultation

Your attachments have been security checked by Mimecast Attachment Protection. Files where no threat or malware was detected are attached.

Dear Sir/Madam

Please see attached correspondence on the proposed East Pye Solar.

The Applicant for the Proposed Development intends to make an application for Development Consent under the Planning Act 2008. The Applicant has sought a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.

The Planning Inspectorate has identified you as a consultation body to inform the Scoping Opinion and is therefore inviting you to submit comments by 12 February 2025. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Kind regards,

Joseph Jones

Joseph Jones
EIA Advisor
The Planning Inspectorate
T 0303 444 5028

@PINSgov The Planning Inspectorate planninginspectorate.gov.uk

Ensuring **fairness**, **openness** and **impartiality** across all our services

This communication does not constitute legal advice.
Please view our Information Charter before sending information to the Planning Inspectorate.
Our Customer Privacy Notice sets out how we handle personal data in accordance with the law.

Please take a moment to review the **Planning Inspectorate's Privacy Notice** which can be accessed by clicking this link.

Please note that the contents of this email and any attachments are privileged and/or confidential and intended solely for the use of the intended recipient. If you are not the intended recipient of this email and its attachments, you must take no action based upon them, nor must you copy or show them to anyone. Please contact the sender if you believe you have received this email in error and then delete this email from your system.

Recipients should note that e-mail traffic on Planning Inspectorate systems is subject to monitoring, recording and auditing to secure the effective operation of the system and for other lawful purposes. The Planning Inspectorate has taken steps to keep this e-mail and any attachments free from viruses. It accepts no liability for any loss or damage caused as a result of any virus being passed on. It is the responsibility of the recipient to perform all necessary checks.

The statements expressed in this e-mail are personal and do not necessarily reflect the opinions or policies of the Inspectorate.

DPC:76616c646f72



If you are not the intended recipient, please notify our Help Desk at Email Information.Solutions@nats.co.uk immediately. You should not copy or use this email or attachment(s) for any purpose nor disclose their contents to any other person.

NATS computer systems may be monitored and communications carried on them recorded, to secure the effective operation of the system.

Please note that neither NATS nor the sender accepts any responsibility for viruses or any losses caused as a result of viruses and it is your responsibility to scan or otherwise check this email and any attachments.

NATS means NATS (En Route) plc (company number: 4129273), NATS (Services) Ltd (company number 4129270), NATSNAV Ltd (company number: 4164590) or NATS Ltd (company number 3155567) or NATS Holdings Ltd (company number 4138218). All companies are registered in England and their registered office is at 4000 Parkway, Whiteley, Fareham, Hampshire, PO15 7FL.

Date: 10 February 2025
Our ref: 499672
Your ref: EN0110014

Consultations
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 900

The Planning Inspectorate
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol, BS1 6PN

eastpyesolar@planninginspectorate.gov

BY EMAIL ONLY

Dear Mr Joseph Jones

Environmental Impact Assessment Scoping Consultation under Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulation 11

Proposal: East Pye Solar: Solar Farm
Location: Long Stratton, Norfolk

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in the consultation dated 15 January 2025, received on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

A robust assessment of environmental impacts and opportunities, based on relevant and up to date environmental information, should be undertaken prior to an application for a Development Consent Order (DCO). Annex A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for the proposed development.

For this development, in particular, Natural England highlights that the following issues require consideration within the EIA:

- Impacts of the proposed development on: Norfolk Valley Fens Special Area of Conservation (SAC), Broadland Ramsar and Special Protection Area (SPA), The Broads SAC, Pulham Market Big Wood Site of Special Scientific Interest (SSSI), Aslacton Parish Land SSSI, Forncett Meadows SSSI, Fritton Common SSSI, Shotesham-Woodton Hornbeam Woods SSSI, Sexton Wood SSSI, Flordon Common SSSI, Shotesham Common SSSI, Hedenham Wood SSSI, Tindall Wood, Ditchingham SSSI. (see sections 5 and 6 of Annex A for more detailed advice).
- Impacts of air pollution from construction traffic and dust on designated sites (see section 15 of Annex A).
- Impacts of the proposed development on best and most versatile soil (see section 14

of Annex A).

- Impacts of the proposed development on Ancient Woodland: Popes Wood, The Grove, Doylys Grove, Big Wood, Little Wood, Winters Grove, Saxlingham Grove, Spring Wood, Becketts Wood, Privet Wood, Ringers Grove, Great Wood, Green Farm Grove, Brooke Wood, Howe Grove, Bunnell wood, unnamed woodland, 1.3km south of site 9, Hedenham Wood, Long Row. (see section 10 of Annex A.)

Natural England have been engaged by the applicant in Pre-Application discussions via our Discretionary Advice Service. To date, only high level advice relating to protected sites, soils and ancient woodland has been provided. Natural England will continue to engage with the applicant throughout the pre-application stages.

Detailed advice on scoping the Environmental Statement is available in the attached Annex.

For any further advice on this consultation please contact the case officer [redacted]@naturalengland.org.uk and copy to consultations@naturalengland.org.uk.

Yours sincerely

Gemma Clark
Norfolk and Suffolk Sustainable Development Team

Annex A – Natural England's Advice on EIA Scoping

1) General principles

1.1 Regulation 11 of the Infrastructure Planning Regulations 2017 - (The EIA Regulations) sets out the information that should be included in an ES to assess impacts on the natural environment. This includes:

- A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases
- Appropriately scaled and referenced plans which clearly show the information and features associated with the development
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen
- A description of the aspects and matters requested to be scoped out of further assessment with adequate justification provided[1].
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation etc.) resulting from the operation of the proposed development
- A description of the aspects of the environment likely to be significantly affected by the development including biodiversity (for example fauna and flora), land, including land take, soil, water, air, climate (for example greenhouse gas emissions, impacts relevant to adaptation), cultural heritage and landscape and the interrelationship between the above factors
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium, and long term, permanent and temporary, positive, and negative effects. Effects should relate to the existence of the development, the use of natural resources (in particular land, soil, water and biodiversity) and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment
- An outline of the structure of the proposed ES

1.2 Based on the EIA Scoping Report provided, it appears that these principles are likely to be met.

2) Cumulative and in-combination effects

2.1 The ES should fully consider the implications of the whole development proposal. This should include an assessment of all supporting infrastructure.

2.2 An impact assessment should identify, describe, and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment (subject to available information):

a. existing completed projects
b. approved but uncompleted projects

[1] National Infrastructure Planning Advice Note Seven, Environmental Impact Assessment, Process, Preliminary Environmental Information and Environmental Statements (see Insert 2 – information to be provided with a scoping request)

c. ongoing activities
d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

Table 1: Plans or projects that Natural England is aware of that might need to be considered in the ES	
Project/Plan	Status
High Grove Solar Farm	Pre – Application
Norfolk Boreas Offshore Wind Farm (terrestrial elements)	Approved but uncompleted project
Norfolk Vanguard Offshore Wind Farm (terrestrial elements)	Approved but uncompleted project
National Grid Norwich to Tilbury scheme	Pre-application
The Droves Solar Farm	Pre-Application

3) Environmental data

3.1 Natural England is required to make available information it holds where requested to do so. National datasets held by Natural England are available at http://www.naturalengland.org.uk/publications/data/default.aspx.

3.2 Detailed information on the natural environment is available at www.magic.gov.uk. This includes Marine Conservation Zone GIS shapefiles.

3.3 Natural England's SSSI Impact Risk Zones are a GIS dataset which can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the Natural England Open Data Geoportal.

3.4 Natural England does not hold local information on local sites, local landscape character, priority habitats and species or protected species. Local environmental data should be obtained from the appropriate local bodies. This may include the local environmental records centre, the local Wildlife Trust, local geo-conservation group or other recording society.

4) Biodiversity and geodiversity

4.1 The assessment will need to include potential impacts of the proposal upon sites and features of nature conservation interest as well as opportunities for nature recovery through biodiversity net gain (BNG). There might also be strategic approaches to take into account.

4.2 Ecological Impact Assessment (EcIA) is the process of identifying, quantifying, and evaluating the potential impacts of defined actions on ecosystems or their components. EcIA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal. Guidelines and an EcIA checklist have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM).

5) Designated nature conservation sites

5.1 International and European sites
The development site is within or may impact on the following **European/internationally designated nature conservation site(s):** Norfolk Valley Fens SAC, The Broads SAC, Broadland SPA, Broadland Ramsar.

5.2 The ES should thoroughly assess the potential for the proposal to affect internationally designated sites of nature conservation importance / European sites, including marine sites where relevant. This includes Special Protection Areas (SPA), Special Areas of Conservation (SAC), listed Ramsar sites, candidate SAC and proposed SPA.

5.3 Article 6 (3) of the Habitats Directive requires an appropriate assessment where a plan or project is likely to have a significant effect upon a European Site, either individually or in combination with other plans or projects.

5.4 Natural England always advise that our SSSI Impact Risk Zones are used to inform the scoping of potential impacts to SSSIs from development, as well as professional judgement. In addition, we would advise that application of standard threshold distances for assessment may not be suitable, especially when sites support mobile/migratory bird species and/or may be impacted via a pathway originating further than the threshold used.

5.5 For the purposes of the Scoping exercise, we have provided below a table of the relevant internationally designated sites that we consider should be scoped in for further assessment in the ES (Table 2). There is a similar table in the following section, 'Nationally Designated Sites', (Table 3).

Table 2: Potential risk to international designated sites: the development is within or may impact on the following sites		
Site name with link to conservation objective	**Features which the ES will need to consider**	**Potential impact pathways where further information/assessment is required**
Norfolk Valley Fens SAC	All Habitats & Species noted on the SAC citation.	Norfolk Valley Fens SAC is located 7.4km north-west. Flordon Common is a component site of the Norfolk Valley Fens SAC and is 2.4km north-west of sub-Site 4A. The feature may be sensitive to changes in water quality. It is noted that Chapter 2 of the EIA Scoping report states that there are several watercourses crossing the site. Therefore, Natural England advise impacts on water quality will need to be assessed as the proposed development may be hydrologically connected to the SAC.
The Broads SAC	All Habitats & Species noted on the SAC citation.	There are five parcels of land covered by the Broads SAC within 10km of the Site. There are several water courses in proximity of the site. Natural England note the EIA Scoping Report has scoped out

Table 2: Potential risk to international designated sites: the development is within or may impact on the following sites		
Site name with link to conservation objective	**Features which the ES will need to consider**	**Potential impact pathways where further information/assessment is required**
		impacts from water quality from contamination and included measures to mitigate risk (paragraph 5.3.35). Further assessment is required to determine if the 5 parcels are hydrologically linked to this SAC. (paragraph 5.35). Consideration should be given to any possible effects of the cable works upon watercourses linked to the SAC (e.g. methodology used for watercourse crossings). It is noted that such crossings will be 'avoided or minimised' (paragraph 8.7.2).
Broadland SPA	Bewick's swan, Cygnus columbianus bewickii - A037, nb Whooper swan, Cygnus cygnus - A038-B, nb	The assessment states that due to the separation distances involved, and the undulating topography of the Sites and enclosed nature of many of the field compartments it is unlikely that Bewick's swan and Whooper swan would utilise the habitats around the site. (Page 216). Natural England agrees the risk of impact is relatively low and can be scoped out of the assessment. However, we advise that full justification and evidence is given to screening this out of the HRA.
Broadland Ramsar	All Habitats & Species noted on the SAC citation.	There are five parcels of land covered by the Broadland Ramsar within 10km of the Site. There are several water courses in proximity of the site. Natural England note the EIA Scoping Report has scoped out impacts from water quality from contamination and included measures to mitigate risk (paragraph 5.3.35). Further assessment is required to determine if the 5 parcels are hydrologically linked to this SAC. (paragraph 5.35). Consideration should be given to any possible effects of the cable works upon watercourses linked to the SAC (e.g. methodology used for watercourse crossings). It is noted that such crossings will be 'avoided or minimised' (paragraph 8.7.2).

6) Nationally designated sites

Sites of Special Scientific Interest

6.1 The EIA Scoping Report has identified several SSSIs within 10km of the draft order limits. Natural England advise that the development site is within or may impact on the following **Sites of Special Scientific Interest:**

- Pulham Market Big Wood Site of Special Scientific Interest (SSSI)
- Aslacton Parish Land SSSI
- Forncett Meadows SSSI
- Fritton Common SSSI
- Shotesham-Woodton Hornbeam Woods SSSI
- Sexton Wood SSSI
- Flordon Common SSSI
- Shotesham Common SSSI
- Hedenham Wood SSSI
- Tindall Wood
- Ditchingham SSSI

6.2 The ES should include a full assessment of the direct and indirect effects of the development on the features of special interest within any nearby SSSI's and identify appropriate mitigation measures to avoid, minimise or reduce any adverse significant effects.

6.3 Natural England's SSSI Impact Risk Zones can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the Natural England Open Data Geoportal.

Table 3: Potential risks to nationally designated sites: the development is within or may impact on the following sites		
Site name with link to citation	**Features which the ES will need to consider**	**Potential impact pathways where further information/assessment is required**
Pulham Market Big Wood SSSI	All habitats and species for which the site has been notified.	The notified habitats at this site and the notified species they support may be sensitive to changes in air quality and water quality. An assessment of air quality impacts from construction traffic and dust and an assessment of a hydrological connection should be scoped into the ES.
Aslacton Parish Land SSSI	All habitats and species for which the site has been notified.	The notified habitats at this site and the notified species they support may be sensitive to changes in water quality. An assessment of a hydrological connection should be scoped into the ES.
Forncett Meadows SSSI	All habitats and species for which the site has been notified.	The notified habitats at this site and the notified species they support may be sensitive to changes in water quality. An assessment of a hydrological connection should be scoped into the ES.
Fritton Common SSSI	All habitats and species for which the site has been notified.	The notified habitats at this site and the notified species they support may be sensitive to changes in water quality. An assessment of a hydrological connection should be scoped into the ES.
Shotesham-Woodton Hornbeam Woods SSSI	All habitats and species for which the site has been notified.	The notified habitats at this site and the notified species they support may be sensitive to changes in air quality and water quality. An assessment of air quality impacts from construction traffic and dust

Table 3: Potential risks to nationally designated sites: the development is within or may impact on the following sites		
Site name with link to citation	**Features which the ES will need to consider**	**Potential impact pathways where further information/assessment is required**
		and an assessment of a hydrological connection should be scoped into the ES.
Sexton Wood SSSI	All habitats and species for which the site has been notified.	The notified habitats at this site and the notified species they support may be sensitive to changes in air quality and water quality. An assessment of air quality impacts from construction traffic and dust and an assessment of a hydrological connection should be scoped into the ES.
Flordon Common SSSI	All habitats and species for which the site has been notified.	The notified habitats at this site and the notified species they support may be sensitive to changes in air quality and water quality. An assessment of air quality impacts from construction traffic and dust and an assessment of a hydrological connection should be scoped into the ES.
Shotesham Common SSSI	All habitats and species for which the site has been notified.	The notified habitats at this site and the notified species they support may be sensitive to water quality. An assessment of a hydrological connection should be scoped into the ES.
Hedenham Wood SSSI	All habitats and species for which the site has been notified.	The notified habitats at this site and the notified species they support may be sensitive to changes in air quality and water quality. An assessment of air quality impacts from construction traffic and dust and an assessment of a hydrological connection should be scoped into the ES.
Tindall Wood Ditchingham SSSI	All habitats and species for which the site has been notified.	The notified habitats at this site and the notified species they support may be sensitive to changes in air quality and water quality. An assessment of air quality impacts from construction traffic and dust and an assessment of a hydrological connection should be scoped into the ES.

6.4 Additional advice on impacts to air quality and water quality have been provided in sections 15 and 16 of this annex, respectively. This advice may cause additional SSSIs to be scoped into the EIA.

7) Regionally and Locally Important Sites

7.1 The ES should consider any impacts upon local wildlife and geological sites, including local nature reserves. Local Sites are identified by the local wildlife trust, geo-conservation group or other local group and protected under the NPPF (paragraph 187 a). The ES should set out proposals for mitigation of any impacts and if appropriate, compensation measures and opportunities for enhancement and improving connectivity with wider ecological networks. We advise the Applicant to contact the relevant local body for further information.

8) Protected species

8.1 The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law. Records of protected species should be obtained from appropriate local biological record centres, nature conservation organisations and local groups. Consideration should be given to the wider context of the site, for example in terms of habitat linkages and protected species populations in the wider area.

8.2 The area likely to be affected by the development should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and, where necessary, licensed, consultants.

8.3 Natural England has adopted standing advice for protected species, which includes guidance on survey and mitigation measures. A separate protected species licence from Natural England or Defra may also be required. Applicants should check to see if a mitigation licence is required using Natural England guidance on licensing Natural England wildlife licences.

8.4 Where licence need is identified, applicants should make use of Natural England's Pre Submission Screening Service for a review of a draft wildlife licence application. Through this service Natural England will review a full draft licence application to issue a Letter of No Impediment (LONI) which explains that based on the information reviewed to date, that it sees no impediment to a licence being granted in the future should the Development Consent Order (DCO) be issued. This is done to give the Planning Inspectorate confidence to make a recommendation to the relevant Secretary of State in granting a DCO. Advice Note Eleven, Annex C – Natural England and the Planning Inspectorate | National Infrastructure Planning for details of the LONI process.

9) Priority Habitats and Species

9.1 Priority Habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. Lists of priority habitats and species can be found here. Natural England does not routinely hold species data. Such data should be collected when impacts on priority habitats or species are considered likely.

9.2 Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. Sites can be checked against the (draft) national Open Mosaic Habitat (OMH) inventory published by Natural England and freely available to download. Further information is also available here.

9.3 An appropriate level habitat survey should be carried out on the site, to identify any important habitats present. In addition, ornithological, botanical, and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present.

9.4 The ES should include details of:

- Any historical data for the site affected by the proposal (e.g. from previous surveys)
- Additional surveys carried out as part of this proposal

- The habitats and species present
- The status of these habitats and species (e.g. whether priority species or habitat)
- The direct and indirect effects of the development upon those habitats and species
- Full details of any mitigation or compensation measures
- Opportunities for biodiversity net gain or other environmental enhancement

10) Ancient Woodland, ancient and veteran trees

10.1 Ancient Woodland is mapped in the proximity of the proposed development. This includes 6 parcels adjacent to the sites (Pope's Wood adjacent to sub-Site 7C, Doyly's Grove to sub-Site 7C, Saxlingham Grove to sub-Sites 7F & 7G, Little wood to sub-Site 7H, Ringers Grove to 8A, and Spring Wood to sub-Site 3A & 3B). The ES should assess the impacts of the proposal on the ancient woodland and any ancient and veteran trees, and the scope to avoid and mitigate for adverse impacts. It should also consider opportunities for enhancement.

10.2 Dust has been scoped out of the assessment however there could be an impact to nearby ancient woodlands and therefore needs consideration.

10.3 Please refer to the Natural England and the Forestry Commission's standing advice on ancient woodland, ancient and veteran trees. We advise that 15 metres from the boundary of ancient woodland is considered a **minimum** distance. The standing advice provides further detail on when the buffer zones should be increased and what the buffer zone should/should not include.

10.4 Ancient woodland is an irreplaceable habitat of great importance for its wildlife, its history, and the contribution it makes to our diverse landscapes. Paragraph 193 c of the National Planning Policy Framework (NPPF) sets out the highest level of protection for irreplaceable habitats and development should be refused unless there are wholly exceptional reasons, and a suitable compensation strategy exists.

10.5 Natural England maintains the Ancient Woodland Inventory which can help identify ancient woodland. The wood pasture and parkland inventory sets out information on wood pasture and parkland.
The ancient tree inventory provides information on the location of ancient and veteran trees.

11. Biodiversity net gain

11.1 The Environment Act 2021 includes NSIPs in the requirement for BNG, with the biodiversity gain objective for NSIPs defined as at least a 10% increase in the pre-development biodiversity value of the on-site habitat. It is the intention that BNG should apply to all terrestrial NSIPs accepted for examination from November 2025.

11.2 The EIA Scoping Report states that the biodiversity approach adopted in the ES will contribute to the establishment of coherent ecological networks, supporting the biodiversity net gain (BNG) targets of the Environment Act 2021 and the current Overarching NPS for Energy (EN-1). (Paragraph 8.6.3). Natural England would encourage the Applicant to commit to at least 10% Biodiversity Net Gain across habitat, river and hedgerow units, illustrated via the use of the statutory biodiversity metric.

11.3 in order to maximise nature recovery and target habitat enhancement where it will have the greatest local benefit it is recommended that locally identified opportunities should be

acknowledged and incorporated into the design of BNG (both on and off-site). This should include any locally mapped ecological networks and priority habitats identified within and close to the development site. Natural England also recommend consultation with the Norfolk Wildlife Trust, and any other local bodies, who may be able to provide invaluable local knowledge to help steer the mitigation and enhancement proposed by the project.

11.4 In addition, Local Nature Recovery Strategies (LNRS) are a new mandatory system of spatial strategies for nature established by the Environment Act 2021 which will contribute to the national Nature Recovery Network (NRN). Work is currently underway to develop these strategies, which will identify strategic priorities for nature protection, recovery, and enhancement. Given the size and scale of the project, there are opportunities not only for enhancing biodiversity in the locality, but also to create and enhance ecological connectivity in the area, contributing to the Nature Recovery Network and climate change resilience. The ES should make clear the project's contribution to ecological connectivity in the area, the Nature Recovery Network and climate change resilience.

12) Landscape

Nationally designated landscapes

12.1 The development site is not within, or within proximity to, any nationally designated landscapes.

Landscape and visual impacts

12.2 The environmental assessment should refer to the relevant National Character Areas. Character area profiles set out descriptions of each landscape area and statements of environmental opportunity.

12.3 Whilst Natural England will not usually make comments on local landscape impacts, the EIA should include a full assessment of the potential impacts of the development on local landscape character using landscape assessment methodologies. We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute (LI) and Institute of Environmental Management and Assessment (IEMA) in 2013. LCA provides a sound basis for guiding, informing, and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character.

12.4 A landscape and visual impact assessment should also be carried out for the proposed development and surrounding area. Natural England recommends use of the methodology set out in Guidelines for Landscape and Visual Impact Assessment 2013 (3rd edition) produced by LI and IEMA. For National Parks and AONBs, we advise that the assessment also includes effects on the 'special qualities' of the designated landscape, as set out in the statutory management plan for the area. These identify the particular landscape and related characteristics which underpin the natural beauty of the area and its designation status.

12.5 The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. This should include an assessment of the impacts of other proposals currently at scoping stage.

12.6 To ensure high quality development that responds to and enhances local landscape character and distinctiveness, the siting and design of the proposed development should reflect local characteristics and, wherever possible, use local materials. Account should be taken of local design policies, design codes and guides as well as guidance in the National Design Guide and National Model Design Code. The ES should set out the measures to be

taken to ensure the development will deliver high standards of design and green infrastructure. It should also set out detail of layout alternatives, where appropriate, with a justification of the selected option in terms of landscape impact and benefit.

12.7 The National Infrastructure Commission has also produced Design Principles for National Infrastructure - NIC endorsed by Government in the National Infrastructure Strategy.

13) Connecting people with nature

13.1 There are a number of PRoWs that are located within the Site and wider countryside surrounding the Site (shown on Figures 7.2.2 – 7.2.4 (Volume II)). The PRoWs have been scoped into the Landscape and Visual Impact Assessment (LVIA). There are no National Trails or National Cycle Routes in the site or study area.

13.2 The ES should consider potential impacts on access land, common land, public rights of way and, where appropriate, the England Coast Path and coastal access routes and coastal margin in the vicinity of the development, in line with NPPF paragraph 104 and there will be reference in the relevant National Policy Statement. It should assess the scope to mitigate for any adverse impacts. Rights of Way Improvement Plans (ROWIP) can be used to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

13.3 Measures to help people to better access the countryside for quiet enjoyment and opportunities to connect with nature should be considered. Such measures could include reinstating existing footpaths or the creation of new footpaths, cycleways, and bridleways. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Access to nature within the development site should also be considered, including the role that natural links have in connecting habitats and providing potential pathways for movements of species.

13.4 Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.

14) Soils and agricultural land quality

14.1 Due to the scale of the project, there is potential for significant impacts to Soils and Best and Most Versatile Agricultural Land. Further detail is provided below.

14.2 Soils are a valuable, finite natural resource and should also be considered for the ecosystem services they provide, including for food production, water storage and flood mitigation, as a carbon store, reservoir of biodiversity and buffer against pollution. It is therefore important that the soil resources are protected and sustainably managed. Impacts from the development on soils and best and most versatile (BMV) agricultural land should be considered. Further guidance is set out in the Natural England Guide to assessing development proposals on agricultural land.

14.3 The survey data should inform the soil management plan for the site, including suitable soil handling methods and appropriate reuse of the soil resource where required (e.g. agricultural reinstatement, habitat creation, landscaping, allotments and public open space). The aim will be to minimise soil handling and maximise the sustainable use and management of the available soil to achieve successful after-uses and minimise off-site impacts. Further information is available in the Defra Construction Code of Practice for the

Sustainable Use of Soil on Development Sites and The British Society of Soil Science Guidance Note Benefitting from Soil Management in Development and Construction.

14.4 The Agricultural Land Classification (ALC) survey should also be used to inform the final design of the project and inform micro-siting of infrastructure such as the Battery Energy Storage System (BESS) to avoid BMV land. The ES should then set out details of how any adverse impacts on BMV agricultural land have been minimised through site design/masterplan.

14.5 Results of the ALC survey should be presented to indicate the land take (including amount of BMV land) for each element of the proposals, i.e. Solar PV areas, cable routes, access tracks, battery energy storage system (BESS)/substation infrastructure and mitigation/enhancement areas. This should also include clarity regarding any agricultural land to be permanently lost, such as the substations.

14.6 The EIA Scoping Report suggests that the lifetime of the development will be up to 60 years. During the life of the proposed development, it is likely that there will be a reduction in potential agricultural production over the development area subject to the solar panel arrays and habitat enhancement. If not time limited, the areas subject to a change in land use or land management have the potential to lead to the permanent reduction in the land's potential agricultural production.

14.7 Natural England advise that a commitment should be made through the DCO to reinstate all Best and Most Versatile Land back to its former ALC grade, following decommissioning.

15. Air quality

15.1 The EIA Scoping Report has scoped out effects on air quality from further assessment. However, Natural England **does not concur** with this conclusion. As stated in paragraph 5.2.24 of the EIA Scoping Report, further review of traffic data will be required. Natural England, therefore, advises that impacts of increased air pollution from construction traffic on nationally and internationally designated sites cannot be scoped out.

15.2 Our advice is that any site within 200m of a road experiencing an increase of 1000AADT (or 200AADT for HDVs) is scoped in for consideration within the ES. For further advice on assessing the impacts of traffic on designated sites, we refer you to Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations – NEA001.

15.3 Air quality in the UK has improved over recent decades but air pollution remains a significant issue. For example, approximately 85% of protected nature conservation sites are currently in exceedance of nitrogen levels where harm is expected (critical load) and approximately 87% of sites exceed the level of ammonia where harm is expected for lower plants (critical level of 1µg)[1]. A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The Government's Clean Air Strategy also has a number of targets to reduce emissions including to reduce damaging deposition of reactive forms of nitrogen by 17% over England's protected priority sensitive habitats by 2030, to reduce emissions of ammonia against the 2005 baseline by 16% by 2030 and to reduce emissions of NOx and SO_2 against a 2005 baseline of 73% and 88% respectively by 2030. Shared Nitrogen Action Plans (SNAPs) have also been identified as a tool to reduce environmental damage from air pollution.

[1] Report: Trends Report 2020: Trends in critical load and critical level exceedances in the UK - Defra, UK

15.4 The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly, or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The ES should take account of the risks of air pollution and how these can be managed or reduced. This should include taking account of any strategic solutions or SNAPs, which may be being developed or implemented to mitigate the impacts of air quality. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System (www.apis.ac.uk).

15.5 Information on air pollution modelling, screening and assessment can be found on the following websites:

- SCAIL Combustion and SCAIL Agriculture - http://www.scail.ceh.ac.uk/
- Ammonia assessment for agricultural development https://www.gov.uk/guidance/intensive-farming-risk-assessment-for-your-environmental-permit
- Environment Agency Screening Tool for industrial emissions https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit
- Defra Local Air Quality Management Area Tool (Industrial Emission Screening Tool) – England http://www.airqualityengland.co.uk/laqm

16) Water quality

16.1 Section 5.3 of the EIA Scoping Report assesses water resources and flood risk. Several watercourses have been identified as flowing within the draft order limits, (Paragraph 5.3.5). The EIA Scoping Report has scoped out effects on water quality from further assessment. However, Natural England **does not concur** with this conclusion. The ES should assess the potential of these watercourses being hydrologically linked to the Norfolk Valley Fens SAC, Broad SAC and Broadland Ramsar. Natural England advise that construction methods used in watercourse crossings are assessed for their impact on water quality.

16.2 NSIPs can occur in areas where strategic solutions are being determined for water pollution issues and they may not have been factored into the local planning system as they are delivered through National Policy Statements.

16.3 The planning system plays a key role in determining the location of developments which may give rise to water pollution, and hence planning decisions can have a significant impact on water quality, and land. The assessment should take account of the risks of water pollution and how these can be managed or reduced. A number of water dependent protected nature conservation sites have been identified as failing condition due to elevated nutrient levels and nutrient neutrality is consequently required to enable development to proceed without causing further damage to these sites. The ES needs to take account of any strategic solutions for nutrient neutrality or Diffuse Water Pollution Plans, which may be being developed or implemented to mitigate and address the impacts of elevated nutrient levels.

17) Climate change

17.1 The ES should identify how the development affects the ability of the natural environment (including habitats, species, and natural processes) to adapt to climate change, including its ability to provide adaptation for people. This should include impacts on the vulnerability or resilience of a natural feature (i.e. what's already there and affected) as well

as impacts on how the environment can accommodate change for both nature and people.

17.2 Part 2 of EN-1 covers the government's energy and climate change strategy, including policies for mitigating climate change. Section 4.10 sets out generic considerations that applicants and the Secretary of State should take into account to help ensure that energy infrastructure is safe and resilient to climate change. This section further advises that the resilience of the project to climate change should be assessed in the ES accompanying an application.

17.3 EN-1 sets out strong support for the use of Nature-based Solutions and nature inclusive design, for example:

- In preparing measures to support climate change adaptation applicants should take reasonable steps to maximise the use of Nature-based Solutions alongside other conventional techniques (4.10.5)
- In addition to avoiding further GHG emissions when compared with more traditional adaptation approaches, Nature-based Solutions can also result in biodiversity benefits and net gain, as well as increasing absorption of carbon dioxide from the atmosphere (4.10.7).
- Applicants should look for opportunities within the proposed development to embed nature-based or technological solutions to mitigate or offset the emissions of construction and decommissioning (5.3.6).
- Steps taken to minimise and offset emissions should be set out in a GHG Reduction Strategy, secured under the Development Consent Order. The GHG Reduction Strategy should consider the creation and preservation of carbon stores and sinks including through woodland creation, hedgerow creation and restoration, peatland restoration and through other natural habitats (5.3.7).
- The design process should embed opportunities for nature inclusive design (5.4.21).
- Applicants should consider any reasonable opportunities to maximise the restoration, creation, and enhancement of wider biodiversity, and the protection and restoration of the ability of habitats to store or sequester carbon (5.4.33).
- In addition to delivering biodiversity net gain, developments may also deliver wider environmental gains and benefits to communities relevant to the local area, and to national policy priorities, such as:

    • reductions in GHG emissions
    • reduced flood risk
    • improvements to air or water quality
    • climate adaptation
    • landscape enhancement
    • increased access to natural greenspace, or
    • the enhancement, expansion or provision of trees and woodlands.

The scope of potential gains will be dependent on the type, scale, and location of specific projects. Applicants should look for a holistic approach to delivering wider environmental gains and benefits through the use of Nature-based Solutions and Green Infrastructure.

17.4 Key Natural England resources that you may find useful include:

- Carbon storage and sequestration by habitat: a review of the evidence (second edition)
- Climate Change Adaptation Manual: Evidence to support nature conservation in a changing climate -This contains the Landscape Scale Climate Change Assessment Methodology
- Nature Networks Evidence Handbook

Norfolk County Council's Technical Response to the Planning Inspectorate

Consultation on the East Pye Solar Project – Information to be provided in the Environmental Statement

7 February 2025

1. Introduction

1.1 The technical officer-level comments below are made on a without prejudice basis and the County Council reserves the right to make further comments at subsequent stages in the Development Consent Order (DCO) process.

1.2 The County Council welcomes the opportunity to comment on the East Pye Solar Project – Environmental Impact Assessment (EIA) Scoping Report (January 2025). The comments below follows on from the County Council's response to the applicant's non-statutory consultation undertaken between 23 October 2024 – 6 December 2024.

1.3 While this is an officer-level response, this response has been shared and agreed with the relevant Cabinet Members and Leader of the County Council.

1.4 The remaining response covers the County Council's: (a) Over-arching Comments on the Scoping Report – Section 2 (b) Summary of Issues needed to be addressed in the ES – Section 3; and (c) Detailed technical comments on the Scoping Report set in in Section 4 – 14 below.

2. (a) Over-arching Comments and Concerns

2.1 The County Council has serious concerns regarding the number of topics, which have been scoped out of the Environmental Statement (ES) given the scale of the proposal (1,100 hectares) over such a wide geographic area within South Norfolk. In particular the County Council considers that the following topics should be scoped into the main ES and not in any supplementary documentation, which would potentially carry less weight at the formal Examination stage of the DCO process:

2.2 **Water Environment** – the County Council's comments as Lead Local Flood Authority (LLFA) are set out in more detail in Sections 4 – 14 below. These matters (flood risk assessment; drainage implications etc) need to be addressed in the Environmental Statement given the scale of the development

over such a wide area with a diverse range of development being taken forward comprising solar arrays (scale and type to be confirmed); battery storage facilities; invertor stations; cabling between solar farm sites and connection;

2.3 **Health Impact Assessment (HIA)** including mental health impact assessment – these should be considered as part of the ES. The subject matter (covering for example magnetic and electromagnetic fields (EMF)) has the potential to raise significant local concerns, which needs thoroughly investigating and addressing within a HIA forming part of the ES. The ES should cover off mental health issues associated with the "perceptions" of health and safety risks relating to not just EMFs but also battery storage facilities;

2.4 **Minerals and Waste** – these matters should be scoped into the ES given the site coverage and potential to sterilise large swathes of land; and the waste implications associated with decommissioning and / or replacement of solar arrays or supporting infrastructure during the lifetime of the project. These matters need to be thoroughly addressed in the ES;

2.5 **Socio-economics** – these issues need to be addressed in the ES covering off the potential implications and impacts on local communities and businesses both during construction and operation. The ES will need to consider appropriate mitigation and compensation to these groups given the large scale of the development proposed and longevity of the project. The ES also needs to address in this section: (a) Skills and employment opportunities and impacts; (b) impacts on the local airstrips including aircraft safety implications arising from glint and glare from the solar panels; (c) implications on the potential loss of the best and most versatile agricultural land; and (d) the potential to use the power generated more locally. This latter point should be covered off in an Energy Statement which could be required post consent, but nevertheless addressed/considered in the ES.

3. (b) Summary of Issues needed to be addressed in ES

3.1 The County Council recognise that this project is at an early stage in the planning process and that it will be taken forward as a Nationally Significant Infrastructure Project (NSIP), given its scale (over 50 MW in generating capacity). As such the final planning decision will rest with the Secretary of State for Energy Security and Net Zero.

3.2 It is understood that the Project covering around 1,100 Ha will generate up to 500 MW of electricity sufficient to supply over 100,000 homes with electricity and comprise solar panels potentially up to 4.5 metres in height; a new substation to connect to the Grid; a Battery Storage Facility in the form of a battery energy storage system (BESS); a series of invertors; and underground cabling between the various solar farm sites. At this stage details about the proposal in terms of design; layout and technology to be used are limited.

Similarly there is little supporting material to demonstrate appropriate mitigation and compensation, which will be needed at the formal statutory consultation stages to follow.

3.3 There are a number of significant issues arising which need to addressed in the applicant's Environmental Statement (ES) in relation to:

(a) The number of individual solar farm sites being included within the proposal, 10 separate sites in total, many of which are further split into 2 or more separate sites will have a significant impact on landscape and communities in this area. The dispersed pattern and piecemeal nature of the proposal has the potential to affect a significant number of communities including those in and around: Long Stratton; Hempnall; Woodton; Brooke; Tharston; and Great Moulton; as well as those residents in between – the socio-economic and Health / mental health implications need to be considered in the ES;

(b) The proposal in its current dispersed form would require a significant amount of connecting cable infrastructure and would likely cause major disruption to local communities and businesses during construction – causing potential severance etc – Issue needs to be addressed in ES (Socio-Economic section);

(c) There are concerns regarding the close proximity of many of the individual solar farm sites to the highway network including the A140; B1527; and B1332. As Highway Authority the County Council would need assurance / evidence to demonstrate that highway safety would not be compromised from potential glint and glare arising from the solar panels – these highway issues need to be addressed in the ES (transport assessment – transport section);

(d) The above issues surrounding glint and glare could be made worse by tracking Solar Panels, which are typically 4.5 m in height compared to fixed panels which are 3.2 m in height. At this stage it is unclear what technology will be used; and what mitigation measures will be needed – these technical issues need addressing in the ES as it affects local communities both in the socio-economic section and health impact assessment;

(e) The lack of detail surrounding the proposal in terms of the precise siting and location of the solar panels and supporting infrastructure (including the substation; invertors; and Battery Storage facilities); together with a lack of supporting information relating to their design (lack of site plans; drawings; elevations etc) – raises potential serious landscape and ecological concerns – issues to be picked up in the ES landscape and Visual Impact Section;

(f) There are potential flood risk and surface water drainage issues arising, which at this stage are not known or quantified by the applicant – these issues as referred to in more detail below and must be addressed in the ES Water Section;

(g) No assessment has been made in relation to the potential cumulative Impacts on the local community and natural environment associated with National Grid's Norwich to Tilbury overhead power-line project. These issues will need to be addressed in the ES's Socio-economic section; and landscape and visual impact; and ecology/biodiversity sections. Therefore these will be a need for a Cumulative Impact Assessment (CIA);

(h) The potential loss of high-quality (Best and Most Versatile Land) agricultural land should be scoped into the ES with an agricultural land clarification assessment (ALC) carried out by the applicant;

(i) The proposal at present has shown no potential benefits either to the local community or the wider Norfolk community in terms of energy supply – this issue needs to be addressed in the ES and potentially in an Energy Statement (required as part of the DCO);

(j) There is no detail relating to appropriate safety measures associated with battery storage; and emergency vehicle access to the various sites at this time – this should be covered off in both the highway section and socio-economic section of the ES;

(k) There has been little or no consideration on the impact on the local airfields at Tibbenham; and Priory Farm Airstrip insofar as economic impact and aircraft safety – this must be scoped into the ES;

(l) It is unclear over the lifetime of the project whether there would be a need for any replacement and/or upgrades to the panels and other supporting infrastructure and as such the ES should consider decommissioning and replacement of infrastructure over the lifetime of the project; and

(m) While acknowledging that the proposal would technically be a temporary use of the land there is no detail provided at this time on how the project would be decommissioned; and whether some infrastructure such as the substation; and/or the Battery Storage facility may be retained in perpetuity. These issues need addressing in the ES.

3.4 Therefore, given the lack of detail surrounding this proposal; the lack of supporting evidence; and given its scale, the County Council does at this stage have significant concerns in terms of the potential impacts on local communities; businesses; and the wider environment. These issues need to be fully considered as part of the applicant's ES to support the DCO application.

3.5 Appropriate safeguards and mitigation measures will be needed along with compensation for those affected by the proposal/s and these issues should be addressed in the ES.

(c) Technical Response – matters to addressed in the Environmental Statement (ES)

4. Strategic Overview and Comments

4.1 **Bringing Power into Norfolk** - While acknowledging the wider strategic need for energy security and the move away from fossil fuels, the proposal set out by Island Green Power (IGP) does not bring any direct or immediate benefit to Norfolk in terms of providing clean energy to existing or planned homes and businesses.

4.2 The County has significant planned housing and employment growth and as such consideration should be made by IGP at this early stage in the NSIP process as to how Norfolk could potentially benefit from any new electricity infrastructure in terms of clean energy supplies.

4.3 IGP need to actively engage with Norfolk County Council and other key stakeholders, including UKPN, to explore how the above benefits for the County can be realised – see comments below under Energy Statement.

4.4 These Issues need to be scoped into the ES in relation to the socio-economic implications of the project and the potential wider benefits for the local community.

4.5 **Cumulative Impacts** - The following major projects / potential NSIP scale projects need to be considered as part of this proposal and scoped into the ES:

(a) National Grid's - Norwich to Tilbury NSIP scheme, and
(b) Further solar Projects identified in the TEC (Transmission Entry Capacity) Register, to the South and Southwest of this project.

The Preliminary Environmental Information Report (PEIR) and Environmental Impact Assessment (EIA) should comprehensively evaluate these projects. As part of this evaluation a Cumulative Impact Assessment (CIA) will need to be carried out. In addition there will need to be appropriate coordination between projects to ensure there is minimum local disruption caused both during construction and operation.

Should you have any queries with the above comments please contact:
Stephen Faulkner [redacted]@norfolk.gov.uk

5. Socio-Economic

(a) Community Benefit Funding

5.1 The County Council would expect IGP to fully engage with those local communities affected by this development; and for the EIA and Environmental Statement (ES) to reflect that engagement. Whether through the formal DCO process or post DCO, there would be an expectation that IGP will provide and take forward a Community Benefit Fund (CBF).

5.2 While accepting that any such fund may sit outside land-use planning regime (at present), reference to a CBF should be scoped into the ES as part of any wider consideration of impacts on local communities and businesses and the potential for mitigation and compensation.

(b) Skills and Employment

5.3 The ES and the Preliminary Environmental Information Report will need to assess the wider economic opportunities arising from the above development both in terms of the scheme coming forward on its own and in combination with other major energy / energy transmission projects in the area. The EIA will need to indicate:

- Likely number of jobs created on this project as a whole;
- Jobs likely to be generated locally (i.e. within Norfolk);
- An indication of the type of jobs created e.g. construction; engineering; and opportunities for training should be scoped into the ES. The County Council would expect the applicant to prepare a skills and employment plan/strategy as part of the DCO process and reference to this should be scoped into the ES;
- Likely duration of any construction work; and
- Potential to use local supply chains and preparation of a Supply Chain Strategy as part of the DCO process.

(c) Compensation

5.4 The ES will need to consider appropriate mitigation and compensation packages for those homes and businesses directly affected by the construction works, and any longer-term impacts - including potential upgrades and replacement of panels & supporting infrastructure; and eventual decommissioning. The location of the solar panels and ancillary supporting infrastructure will need to avoid any direct impacts on homes and business. Suitable mitigation will be required – see environmental comments below.

(d) Impact on Local Airstrips

5.5 While the proposal sites are not located immediately adjacent to any local airstrips, there are two local airstrips at (1) Tibenham Airfield; and (2) Priory Farm Airstrip. The ES will need to consider the impact on the commercial operation of these airfields and whether "glint and glare" could potentially compromise aircraft safety. The County Council recognises aviation safety is a matter for the Civil Aviation Authority (CAA) and local flying clubs to comment on.

(**e) Agricultural Land**

5.6 In the absence of any detailed assessment of the agricultural land classification (ALC) being taken up across the 1,100 Ha of solar panels, there is concern at the potential loss of the Grades 1,2 and 3a agricultural land. The County Council would expect the applicant through the application process (ES) to undertake an Agricultural Land Classification (ALC) assessment/survey. In addition the applicant should design into the scheme opportunities for alternative agricultural practices, such as grazing or more innovative agrivoltaics to ensure that agricultural land is not lost. There will need to be a requirement in the DCO to safeguard / promote alternative agricultural practices. All these matters need addressing in the ES.

5.7 Should you have any queries with the above comments please contact: Stephen Faulkner [redacted]@norfolk.gov.uk

6. Energy Statement

6.1 The County Council would expect IGP to produce an Energy Statement post consent, secured through a Planning Requirement / Condition attached to the DCO. Notwithstanding this the ES should consider the wider socio-economic implications of the project on local communities and businesses and whether there are wider sustainable benefits of providing clean energy to these areas.

6.2 The Energy Statement will need to address / cover-off the following issues:

- Provide details of how any potential upgrades and /or replacement of the solar panels, or ancillary installations, will be dealt with during the lifetime of the project to avoid impact on local communities and businesses;
- Provide a comprehensive decommissioning plan;
- Demonstrate how the proposal will provide a secure and resilience supply of electricity within the County – avoiding any potential power outages/shortages/interruption of supply;

- Demonstrate how the project aligns with the County Council's approved Climate Strategy; and emerging Energy Plan;

- Opportunities for delivering power locally using the local 132kV network (UKPN). There will need to be evidence that the developer has engaged, or will be engaging, with the local Distribution Network Operator (DNO) to explore distributing electricity generated locally;

- Exploring opportunities to deliver electricity to those areas of the County where there are demonstrable deficits in energy which is known to be holding back development; or causing local problems;

- Consider wider opportunities for decarbonising the grid within the County to deliver:

    - planned housing and employment growth; and/or
    - Local Projects - including self-build in rural areas;

- Consideration of delivering wider sustainable projects including:

    - Electric Vehicle (EV) charging hubs
    - Commercial EV charging hubs including for buses;
    - Providing / unlocking additional power to local businesses and proposed growth in commercial sector – such as Lotus at Hethel.
    - Localised off-grid energy solutions for housing and commercial Projects

Should you have any queries with the above comments please contact: Stephen Faulkner [redacted]@norfolk.gov.uk

7. Highways

7.1 The Environmental Impact Assessment (EIA) scoping report states that the precise alignment of the project, location of construction compounds and the haul roads are not yet finalised and are still under development. Accordingly, there is insufficient detail at present to enable the Local Highway Authority to provide a full assessment of the project and the highway comments below are therefore of a general nature.

7.2 Works currently identified comprise ten site areas for solar PV panels and other equipment associated with them such as a sub-station; cabling; Battery Storage; and a number of inverters. The location of the battery storage facility and the sub-station has been broadly identified south of Great Moulton.

7.3 The Highway Authority ask that specific regard to the A140 corridor especially ensuring the construction of the Long Stratton Bypass, the completed bypass will not be affected by cable-routeing and that all cabling will need to comprise Horizontal Directional Drilling (HDD) to avoid any road closures / disruption. The ES will need to address these issues in the highway / transport section. Consideration on the accumulative traffic impact with the Norwich to Tilbury scheme is required, the current construction timetable is proposed to start

2027.

7.4 As part of initial discussions with the applicant the Highway Authority have asked that the formal DCO application be accompanied by a Transport Assessment (TA) and a Construction Traffic Management Plan (CTMP).

7.5 It is noted that the volume of construction traffic has been estimated but this does not include construction traffic for the Cable Route Corridor (CRC). The TA needs to assess the effects of the anticipated traffic upon driver delay; severance; pedestrian delay; pedestrian amenity; accidents; road safety; and impact from abnormal indivisible loads (AILs).

7.6 As part of any TA and CTMP (forming part of the ES) there will be a need to consider the replacement and upgrades of any solar panels and supporting infrastructure over the lifetime of the project. In addition, consideration must be given to a comprehensive decommissioning plan and how this will affect the local highway network;

7.7 As a general point, the overall thrust of the EIA scope will need to relate to examining increases in traffic volumes (in particular represented as a percentage figure) and the Highway Authority wish to point out that the public highways in and around some of the site areas are narrow lanes. Accordingly, even a small volume of traffic increase on these routes can have a significant impact if vehicles are unable to physically pass each other and this point needs to be considered within the CTMP.

7.8 The ES will need to consider emergency access (to blue light services) associated with any temporary road closures; and/or temporary roadworks.

7.9 A particular issue arising from solar farms is their potential for glint and glare. It is noted that a number of the sites earmarked for the solar panels are immediately adjacent to local highways e.g. A140 - south of the Hempnall roundabout (Site 4); A140 - south of Long Stratton (Site 2); along the B1527 (Sites 5 and 6); and along the B1332 (sites 9 and 10). The applicant through the ES will need to clearly demonstrate that the solar panels will not give rise to any highway safety concerns.

7.10 Therefore given the lack of supporting information in relation to highway matters provided by the applicant there are at this stage highway concerns to this proposal. The County Council welcomes highway and transport matters being scoped into the ES.

7.11 For further Information on highway related matters please contact John Curtis (Engineer Major and Estate Development - NSIP) Email: [redacted]@norfolk.gov.uk

8. Public Rights of Way

8.1 At this stage the County Council would recommend that the applicant takes the following into account in the ES:

- Impacts during construction and decommissioning - If any Public Rights of Way need to be crossed; or are impacted by any construction of supporting infrastructure; or will require a temporary closure, then this would require consultation in advance to the Highway Authority;

- Impacts during operation including any upgrades during the lifetime of the project - If any Public Right of Way will be impacted during the operation and servicing of the project then details should be provided in advance and any proposed mitigation measures be put in place.

8.2 The DCO will likely need a Planning Requirement to address the above matters along the lines:

> *Public Rights of Way Strategy.—(1) No phase of the works that would affect a public right of way specified in Schedule 4 (public rights of way to be temporarily stopped up) is to be undertaken until a public right of way strategy in respect of that phase and in accordance with the outline public rights of way strategy, including the specification for making up of an alternative right of way (where appropriate) has been submitted to and approved by the relevant highway authority in consultation with the relevant planning authority.*

8.3 Any alternative public rights of way must be implemented in accordance with the approved public rights of way strategy.

8.4 Should you have any queries with the above comments please contact: Natural Environment Team - NETI@norfolk.gov.uk

9. Public Health

9.1 Given the scale of the project, Norfolk County Council (NCC) Public Health strongly recommends that human health and wellbeing is scoped into the ES, with a full Health Impact Assessment (HIA) undertaken with its own dedicated chapter. This aligns with discussions held with the project team on 21/10/2024 and was reiterated in NCC's Non-statutory Consultation Technical Response to Island Green Power. While the scoping report concludes that such a chapter is unnecessary due to potential impacts being scoped out or assessed elsewhere, a chapter summarising the project's health related impacts, regardless of their significance, should be included to ensure clarity for stakeholders. The chapter

should address the potential direct health impacts (e.g. air quality) and should consider the wider determinants of health, including potential effects on mental wellbeing. It might be appropriate that potential impacts are assessed in their own chapters, but a health chapter should be included to summarise these impacts whilst also considering potential synergistic effects, which may exacerbate health and wellbeing impacts when considered together. If significant health impacts are identified, appropriate mitigation strategies should be detailed.

9.2 NCC Public Health notes the references to appropriate guidance (5.12.7), and particularly advises the use of the Institute of Environmental Management and Assessment's (IEMA) *Effective Scoping of Human Health in Environmental Impact Assessment* and *Determining Significance for Human Health in Environmental Impact Assessment* (both published in November 2022).

9.3 With the exception of a minor reference in section 5.12.11, the Scoping Report makes little reference to the project's impact on mental health and wellbeing. While certain physical impacts may be deemed insignificant, perceived impacts – particularly in relation to visual amenity impacts and concerns surrounding electromagnetic fields (EMFs) – can contribute to stress and anxiety in local communities. As outlined in IEMA's *Effective Scoping of Human Health in Environmental Impact Assessment*, perceived impacts can have real effects on mental health and should be considered appropriately. As such NCC Public Health reiterates its previous recommendation that the mental health impacts of the project are scoped into the assessment and an appropriate mental health assessment is undertaken, specifically in relation to EMFs as well as concerns around battery storage facilities.

9.4 Regarding EMFs, the UK Health Security Agency is the lead agency with responsibility for health threats from radiation in the UK and is a statutory consultee for Nationally Significant Infrastructure Projects. It should also be consulted regarding the appropriateness of scoping out of the impacts of EMF from the Environmental Statement as 5.5.10 states.

9.5 NCC Public Health notes the commitment to undertaking a construction dust risk assessment in accordance with Institute of Air Quality Management guidance and expects that the potential health impacts form an integral part of this, particularly in relation to vulnerable populations. It would be expected that the impacts on air quality and human health, regardless of their significance, are summarised in a specific human health chapter.

9.6 NCC Public Health notes the commitment to conducting a Cumulative Effects Assessment and advises that particular attention be given to the potential cumulative impacts on local communities' mental health and wellbeing. This is

especially important in relation to inter-project effects, with particular focus on National Grid's Norwich to Tilbury NSIP scheme and the potential development of further solar projects as identified in the Transmission Entry Capacity (TEC) Register.

9.7 Should you have any queries with the above comments please contact Ben Spratling – Advanced Public Health Officer – Prevention [redacted]@norfolk.gov.uk).

10. Minerals and Waste

10.1 The area covered by the project is only sparsely underlain by safeguarded mineral resources (sand and gravel). A desk-based Mineral Resource Assessment (MRA) has been carried out, which has been submitted as appendix 5.1 of the Scoping Report. Table 3.3 of the MRA contains details of the sub-sites which potentially contain Sand and Gravel, together with the area covered (just over 89.6 hectares).

10.2 The East Pye Solar Project is stated to have a limited lifespan of 60 years (appendix 5.1, section 3.3.1), followed by decommissioning, Therefore, it is not considered to permanently sterilise the underlying mineral resources. However, there will still be areas underlain by mineral where intrusive groundworks may take place. Therefore, the application will need to contain analysis of potential effects and mitigation, including the methods for panel installation and reuse of excavated mineral during construction. In order to carry out this analysis, intrusive site investigations, sample assessment (including Particle Size Distribution testing and classification using the material class types), and then consideration of the potential for reuse of suitable mineral in the construction phases will be required. These issues should be considered within the Environmental Statement supporting the application.

10.3 With regard to the Minerals and Waste chapter: In determining whether waste should be scoped in or out of the ES the Minerals and Waste team consider that the Scoping Report is incorrect to use regional landfill capacity data for the East of England. The Institute of Environmental Management and Assessment (IEMA) guidance states that baseline information on waste management infrastructure should be at the waste planning authority, county or other regional scale. It would therefore be most appropriate to use landfill capacity data for Norfolk (the Waste Planning Authority and county) in assessing whether there will be likely significant effects.

10.4 Should you have any queries regarding the above comments please contact Richard Drake (Senior Planner) at [redacted]@norfolk.gov.uk

11. Lead Local Flood Authority (LLFA)

11.1 In Table 3-1, the applicant indicates the PV Mounting Structure would consist of "Metal frames, either secured via metal posts driven into ground at a depth of 1.5-4m, or in areas of Arch protection, weighed down using concrete feet or other non-ground penetrative techniques." Therefore, there may be some impact associated with the use of concrete feet in increasing the impermeable area and therefore the associated surface water runoff from the panels. The extent of this impact is not possible to determine at present and could be significant if required on a large proportion of the areas with panels. Therefore, a suitable surface water management system where flows would be attenuated to greenfield runoff rates would be required to support this type of mounting structure. This could be a significant effect that would require assessment in an EIA.

11.2 In addition, Table 3-1 identifies that "all electrical infrastructure associated with the panels will be elevated by the mounting structures so that it is no less than 0.6m above the 0.1% Annual Exceedance Probability (AEP) flood level or where this is not possible as high as practicable)". However, it does not identify the source of the flooding, therefore the LLFA query whether this approach would apply to surface water and groundwater flooding. This matter needs addressing in an ES.

11.3 The LLFA notes that there is no information or high-level description on the proposed temporary construction works that would be in place for approximately two years. This lack of information at this stage is not appropriate and is not a suitable evidence base to determine whether or not flood risk could be scoped out of the EIA at this time. The LLFA also reminds the applicant that compacted material is considered impermeable and sustainable surface water management will be required for these temporary compound areas and new or improved temporary and permanent access track.

11.4 As this development covers a large area, a phasing plan supported by a construction phase surface water drainage plan will also be required to demonstrate there is no increase in flood risk in the construction phase (further information is provided in the LLFA's Developer Guidance). Otherwise, the proposed development could be considered not in accordance with the principles of NPPF and sustainable drainage.

11.5 The LLFA notes the requirement for construction compounds however, there is no indication of the approximate location and number of them to support the development of the proposed site. Furthermore, the LLFA notes that as the site is to have a lifespan of 60 years, yet the design life of the PV panels is

approximately 25-40 years and the batteries are 15 to 20 years, these structures are likely to be replaced at least once but more likely twice during the scheme's lifetime. The LLFA queries whether the permanent maintenance compounds to facilitate these maintenance activities will be provided with an associated impermeable area. The LLFA will require clarification on the location, duration and the surface water drainage arrangements for each of these construction compounds and should be included in the submission.

11.6 The LLFA notes that in section 3.17 on the decommissioning of the site, the applicant has indicated the decommissioning of the site would only be partial decommissioning as the substation would not be under the control of the applicant at the time of decommissioning. In addition, the ducting would remain in place too. This means the full development has not been accounted for in respect of decommissioning. It is also not clear at this time whether or not any of the proposed access tracks may or may not be retained. This adds further uncertainty to the proposed lifetime of the development as, at present, the decommissioning appears to only relate to the removal of the solar panels and some of the local cables and infrastructure. Further clarification of the proposed development lifetime for the various assets in the different locations will be necessary to support the application. In addition, the decommissioning will need to confirm whether the site will be returned to its previous use and condition as it is not clear in the current information. The potential retention of access tracks beyond the existing proposed lifetime would increase the design requirement of the surface water management.

11.7 In section 5 of the Main EIA Scoping report, the LLFA notes the applicant intends to scope out flood risk and surface water management with only providing the minimal commitment to the provision of a Flood Risk Assessment (FRA). The LLFA notes that a number of the extensive site locations and the supporting infrastructure are upstream in sensitive catchments where there is a substantial history of flooding in downstream communities such as Woodton, Hempnall and Saxlingham where there are records of internally flooded properties. In addition, the LLFA has recently been made aware of a growing issue where the proposed development is potentially preventing the delivery an innovative flood risk management scheme called Reclaim the Rain (www.reclaimthrain.org) that is funded by Defra and the Environment Agency. The issue has arisen where an area depicted for cable route use clashes with an area that had been previously agreed in principle with the landowner to delivery flood risk management measures but is now struggling to progress at this time and is continuing to leave properties in Woodton at flood risk. The LLFA strongly recommends that discussions with the Reclaim the Rain Project team are undertaken with urgency.

11.8 The LLFA notes that a brief high-level discussion on the various sources of flood risk has been undertaken, however no figure has been produced to demonstrate how the extensive proposed development area relates to the flood risk areas. Therefore, the information to determine whether or not to scope out flood risk from the EIA is considered incomplete and inadequate at this time. Delaying this preliminary identification of flood risk until the FRA is produced is inappropriate. Further work is required to support this scoping assessment.

11.9 In section 5.3.29 the applicant has indicated that initial enquiries have been undertaken with the LLFA to "obtain modelled output and flood history information in relation to the site." The LLFA takes this opportunity to remind the applicant that, as previously stated by the LLFA, the flood history information is available on the Flood and Water Management page of the Norfolk County Council website within the Flood Incident Reports. The flood incident reports are regularly being added to and it is the responsibility of the applicant to review them to obtain the information relevant to their proposed development.

11.10 In section 5.3.34 in the section on 'Likely Significant Effects and Proposed Mitigation', the applicant identifies there are likely to be "impacts on water quantity/surface water runoff from increases in impermeable areas during operation". However, there is no consideration to the impacts on surface water runoff from impermeable areas during the construction phase. The LLFA notes that there is again an incomplete consideration of the impacts in the scoping report of surface water runoff throughout the lifetime of the development, which is not in accordance with NPPF paragraphs 181 and 182.

11.11 The applicant has identified the need to mitigate the impacts of the increase in surface water runoff from the development. Therefore, the applicant has also identified the need to include flood risk within the Environmental Impact Assessment. This should be combined with the need for various flood risk management schemes to be undertaken within various local communities due to the local flood history.

11.12 The scoping report makes reference to NPPF. There is reference to the commitment to undertaking an FRA and for the inclusion of SuDS for the operational phase. However, there is no commitment to undertaking a drainage strategy until the summary in section 5.3.46 or for including the use of SuDS for the construction phase. The construction areas are substantial and could create an increase in surface water flood risk due to the compaction of the working areas along with the proposed temporary works that have not been adequately defined in the scoping report and which are indicated in be in place for approximately two years.

11.13 There are a number of associated infrastructure elements that are required to facilitate the connection of the solar arrays to the wider grid along with the BESS elements, such as inverters, transformers, switchgears, substations, ancillary buildings, etc. These components will have an associated impermeable area that will require surface water management measures to support this infrastructure, which is acknowledged in section 5.3.44 for the operational phase. However, there is no indication of what drainage solution would be provided and how much space would be required. Therefore, it would not be possible to ascertain whether there would be an increase in flood risk or not due to the proposed development. An outline drainage design for the operational and construction phases will be required to support the development consent process. Therefore, a precautionary approach would be required while further information is developed.

11.14 In section 3.19, the Commitments Register has been indicated as having been prepared but it is not clear to the reader where this register can be found at this time. A review of the contents page confirms that it has not been appended to the EIA Scoping report.

11.15 The LLFA notes the LLFA's developer guidance has not been mentioned in relation to the surface water drainage design or strategy. This guidance provides the LLFA's developer advice in accordance with Paragraph 182 of NPPF. The LLFA recommend that should any clarification be required, the LLFA is able to provide advice as part of the LLFA Paid Advice Service. The guidance should be considered and used in the preparation of the supporting evidence base for this scheme.

11.16 The LLFA reminds the applicant to obtain the sewer records to ensure that all sources of flood risk are considered.

11.17 *Informative* - Please note, if there are any works proposed as part of this application that are likely to affect flows in a river or watercourse, then the applicant is likely to need the approval of either Norfolk County Council, the Environment Agency or the local Internal Drainage Board. In line with good practice, these organisations seek to avoid culverting where possible. For Norfolk County Council, the consent for such works will not normally be granted except as a means of access. It should be noted that this approval is separate from planning.

11.18 This scoping opinion lacks supporting information to demonstrate that flood risk can be scoped out of the EIA at this time. We strongly recommend that any EIA includes, or any planning application for development is accompanied by an FRA and a surface water drainage strategy to address:

- All sources of flood risk, including those from ordinary watercourses, surface water and groundwater to the development.
- How surface water drainage from the development will be managed on-site and show compliance with the written Ministerial Statement HCWS 161 by ensuring that Sustainable Drainage Systems (SuDS) are put in place.
- How any phasing of the development will affect the overall drainage strategy and what arrangements, temporary or otherwise, will need to be in place at each stage of the development in order to ensure the satisfactory performance of the overall surface water drainage system for the entirety of the development.

11.19 This supporting information would assess the potential for the development to increase the risk of flooding from the proposal or how surface water runoff through the addition of hard surfaces will be managed. It will show how this will be managed to ensure that the development does not increase flood risk on the site or elsewhere, in line with National Planning Policy Framework (NPPF) (Paragraph 181 and 182) and the subsequent EN-1 and EN-5.

11.20 In this particular case this would include appropriate information on:

- Sustainable Drainage Systems (SuDS) proposals in accordance with appropriate guidance including “non-statutory technical standards for sustainable drainage systems” March 2015 by Department for Environment, Food and Rural Affairs.
-
- Appropriate assessment and mitigation of all sources of surface water flooding onsite/originating from offsite that may affect the development, in addition to risk of groundwater flooding.
- Provision of surface water modelling of overland flow routes and mitigation provided to show how flood risk will not be increased elsewhere. This may include temporary culverts sized for the 1% Annual Exceedance Probability (AEP) plus climate change allowance.
- At least one feasible proposal for the disposal of surface water drainage should be demonstrated and, in many cases, supported by the inclusion of appropriate information. It is important that the SuDs principles and hierarchies have been followed in terms of:
    - surface water disposal location, prioritised in the following order: disposal of water to shallow infiltration, to a watercourse, to a surface water sewer, combined sewer / deep infiltration (generally greater than 2m below ground level).
    - the SuDs components used within the management train (source, site and regional control) in relation to water quality and quantity.
    - identifying multifunctional benefits including amenity and biodiversity.
    - Onsite, infiltration testing, in accordance with BRE365 or equivalent should be undertaken to find out if infiltration is viable across the site and

at the depth and location of any infiltration drainage feature. Infiltration testing should be undertaken 3 times in quick succession at each location.

- A surface water drainage system must be provided for the construction, operation and decommissioning of the project, including any temporary construction works.

- The drainage strategy should also contain a maintenance and management plan detailing the activities required and details of who will adopt and maintain all the surface water drainage features for the lifetime of the development.

11.21 Further guidance for developers can be found on our website at https://www.norfolk.gov.uk/rubbish-recycling-and-planning/flood-and-water-management/information-for-developers

11.22 Should you have any queries with any of the above LLFA comments please contact the LLFA – LLFA@norfolk.gov.uk

12. Norfolk Fire and Rescue

12.1 It is recognised that early (preplanning) discussions with Fire and Rescue Services (FRS) will ensure the latest technology, information, operational and environmental excellence can be integrated into plans and deployed across new BESS sites. NFRS would like engagement at local and strategic level throughout the development to create a positive and open collaborative approach. This would include supporting NFRS to obtain and gather Site Specific Risk Information (SSRI) as required under Section 7iid of the Fire and Rescue Services Act 2004.

- Risk control recommendations for all Battery Storage (BESS) installations should be subject to a suitable fire risk assessment and the development and production (amongst others) the following strategies and plans:

- A risk reduction and mitigation strategy that covers the design, construction, installation, operation and decommissioning phases of the project to minimise the impact of an incident.

- An emergency response plan in consultation with Norfolk Fire & Rescue Service, which details site specific information regarding the hazards, locations of hydrants and electrical isolators, measures to be taken during an incident and responses required post incident. Coordination should also include regular onsite training and familiarisation for operational fire service personnel.

- Outline and Detailed Battery Safety Management Plans (BSMP) should be prepared.

- An environmental impact and risk assessment must be completed. This must include firefighting water run-off and potential containment and treatment. Air pollution must also be considered.

- A transport strategy to minimise the impact of additional vehicle movements and prevent an increase in the potential number of traffic incidents, especially in largely rural settings.

12.2 Where appropriate, these plans should be supported with specific fire tests. Property insurers should be involved at an early stage in discussions to agree on a suitable fire strategy for BESS installations. The potential for both property loss and business interruption should be considered. The fire protection and mitigation strategy should be determined on a case-by-case basis, based on battery type, BESS location, layout, compartment construction, system criticality, and other relevant factors. It should be multilayered and include a combination of; good design, thermal runaway avoidance, early detection, and automatic suppression. Manual fire control provision and planning, including water supplies, should be commensurate with BESS and other site fire hazards.

12.3 Norfolk Fire & Rescue (NFRS) Service would like the following points confirmed as part of the scoping and also as requirements under any Planning Requirement for this DCO application, in line with the National Fire Chiefs Council guidance and the new Health and Safety Guidance for Grid Scale BESS:

- BESS rooms and buildings shall be dedicated-use, i.e. not used for any other purpose and accessible only by those required to operate, maintain, test, or inspect the BESS equipment.

- Locate BESS systems in non-combustible containers or enclosures at least 3 metres from other equipment, buildings, structures, and storage. This distance shall only be reduced when: a) a suitable fire-barrier (minimum 1-hour fire rated) is installed between the BESS unit and exposed buildings/ structures, b) exposed surfaces (typically exposed walls) are fire-resisting and blank (i.e. no openings), or c) BESS enclosures are constructed with fire-resisting blank walls and roofs.

- Walk-in containers and other enclosures used to house BESS equipment should not exceed the dimensions of long “high cube” shipping containers, i.e. maximum dimensions, 16.2m long, 2.6m wide, 2.9m high.

- BESS systems should be at least 15 metres from building HVAC air inlets.

- Where installation of BESS equipment in rooms forming part of buildings with other occupancy types cannot be avoided, these should be separated from other areas by minimum 2-hour fire rated construction.

- The Battery Management Storage (BMS) should be configured to monitor potential failure conditions that could lead to a thermal runaway, shut down, and isolate BESS units where any such conditions are detected.

- For critical and significant BESS installations, install early detection of off-gases/electrolyte-vapour from thermal runaway events, interlocked to shut down and disconnect the BESS. This may be combined with deployment of an extinguishing agent flooding system (based on the fire control strategy).

- Provide smoke detection systems for all BESS equipment rooms and compartments, interlocked to shut down and disconnect the BESS. This may be combined with deployment of an extinguishing agent flooding system (based on the fire control strategy).

- BESS areas within sprinklered buildings and all BESS installations where sprinkler protection forms part of the fire strategy, should be provided with sprinkler protection, designed to provide a minimum density of discharge of 12.2mm/min over an assumed fire area of 230m2 (or area of room if smaller).

- BESS rooms and enclosures should be provided with suitably designed explosion overpressure venting.

- Suitable procedures shall be implemented to routinely inspect and test BESS thermal runaway and fire mitigation alarms and systems. Greater separation distances may be appropriate from critical buildings and installations and to meet specified strategic spatial fire separation expectations. Note: Whilst automatic fire suppression is unlikely to extinguish fire in individual battery cells that are undergoing thermal runaway, fire suppression can reduce fire intensity and assist in slowing and limiting fire propagation across battery modules and racks. It may be acceptable to reduce some of the above risk control measures where large scale testing, such as testing to UL9540A or equivalent, demonstrates that adjusted mitigation measures are adequate.

- Ensure that sufficient water is available for manual firefighting. An external fire hydrant should be in close proximity of the BESS containers. − The water supply should be able to provide a minimum of 1,900 l/min for at least 2 hours (dependent upon the design). Further hydrants should be strategically located across the development. These should be tested and regularly serviced by the operator.

- The site design should include a safe access route for fire appliances to manoeuvre within the site (including turning circles). An alternative access point and approach route should be provided and maintained to enable appliances to approach from an up-wind direction.

- The emergency response plan should be maintained and regularly reviewed by the occupier and any material changes notified to NFRS.

- Relevant Health & Safety signage must be provided which offers warning of any hazards and risks at the site.

12.4 Where plans make use of photovoltaics panels across multiple sites, the design of the development should consider ways to contain and restrict the spread of fire through adequate separation between the panels. It should include a safe access and egress routes for fire appliances to be able to reach the structures. Ideally an alternative access point and approach route should be provided to counteract any prevailing winds that may hamper firefighting operations. Its design should meet the latest required standards in electrical safety and consider at all times any design developments in electrical safety such as failure cut out and safety switches at the location of the panels and any interconnecting equipment to other sites, substations and energy storage sites. There should be a regime of regular maintenance to the panels to reduce the risk of fire, such as regular inspection, cleaning and temperature checks which may give early warning of failure to a panel. Should there be areas of vegetation surrounding the panels, it should be well kept and not left to overgrow, which could increase the chances of fire spread should a fire occur.

12.5 Should any of these recommendations be omitted from the design of the development without explaining the reasoning or no reasonable effort made to meet the recommendations by alternative measures to minimise any impacts during an Emergency situation then the Emergency response expected from Norfolk Fire and Rescue Service may not go as expected, which could lead to a detrimental outcome at the development and its surrounding areas.

12.6 Should you have any queries with the above comments please contact: Jennie Schamp, Group Manager [redacted]@norfolk.gov.uk

13. Natural Environment

All the matters below will need to be addressed in the ES:

13.1 Ecology

13.2 At this stage of the consultation, and due to limited available information on the project, listed below are the sites and species that will need consideration going forward and addressing in the ES:

13.3 *Protected Sites:*

- Statutory Sites: Special Protection Areas, Special Area of Conservation, Ramsar, and Sites of Special Scientific Interest.
- Non-statutory Sites: County Wildlife Sites, Local Nature Reserves, Roadside Nature Reserves,

13.4 Protected Species:

- Bats, Breeding Birds, Wintering Birds, Amphibians, Reptiles, Invertebrates, and Badgers

13.5 Notable Species:

- Brown Hare, Hedgehog,

13.6 Invasive Non-native Species:

- Himalayan Balsam, Japanese Knotweed, Mink,

13.7 With the above it will be relevant to develop several documents / sections within the ES covering: pre-commencement, construction, operation, and decommissioning.

13.8 Ecological Survey Requirements - The sites identified should be carefully refined, taking account of all relevant ecological impacts, including locally designated wildlife sites. It is also important that any desk study should include the collation of all relevant habitat and species data from the Norfolk Biodiversity Information Service (NBIS), including all Local Wildlife Site information. All surveys carried out will require to be up to date, therefore given the potential timescales involved with such a scheme, it may be necessary to carry out regular surveys throughout the course of the design stage to ensure all surveys are no more than 18 months old.

13.9 **Ecological Reporting** - The scheme will need to consider all ecological effects, both during construction and in-operation. The scheme should adhere to the ecological mitigation hierarchy and avoid impacts in the first instance. Where impacts cannot be avoided, mitigation measures will need to be identified, and compensation provided. Impacts to Irreplaceable Habitats (e.g. Ancient Woodland) should be fully avoided. In addition, (dependant on timeline) the development will be expected to deliver the mandatory minimum 10% Biodiversity Net Gain (from late November 2025 for NSIPS) and contribute towards the Local Nature Recovery Strategy (LNRS.

13.10 **Cumulative Impacts** – given the proximity of other NSIPs in the area the EIA will need to address the cumulative impacts with these other projects and set out appropriate mitigation measures and indicate how this relates to

Biodiversity Net Gain (BNG) targets and to the Local Nature Recovery Strategy (LNRS).

13.11 There will need to be consideration of the potential impacts and mitigation required associated with any upgrades to the Solar Farm, including upgrades to the supporting infrastructure. Further consideration must be given to decommissioning and the impacts on ecology and implications for BNG.

13.12 **Landscape**

13.13 A full Landscape and Visual Impact Assessment should be undertaken, including where necessary a Townscape Assessment as part of the ES. This should consider all potential impacts, both during construction and in-operation, and the cumulative impacts with other NSIPs. Further consideration should be given to the decommissioning of the Solar Farm and any retained infrastructure.

13.14 Where impacts cannot be avoided then **mitigation measures** will need to be identified. Whilst advanced planting and screening will not minimise all impacts, carefully planned incremental planting can be effective at minimising and softening the appearance of infrastructure in the landscape. Often layered planting starting some distance away can help to break up extensive views. This will be particularly important when considering the screening options for the substation, converter stations and integrated battery storage facility, where landscape and visual impacts have the potential to be significantly adverse. The massing, location and scale of the previous mentioned infrastructures should be considered to ensure both short distance and long-distance views are taken into account. In addition to layered planting consideration should be given to finishes, orientation of elements and siting of elements within the site to avoid continuous change on the horizon.

13.15 Impacts will need to be considered from Public Rights of Way and the EIA will need to demonstrate how these impacts will be minimised / mitigated. Account will also need to be taken of proximity to housing and the need to avoid any potential impacts in relation to visual amenity; and “glint and glare”. At this stage it is unclear what type of solar panels will be used and whether they could include tracking panels which are understood to stand higher at 4.5 m rather than fixed panels which are typically around 3.2 m. Clearly the larger / taller panels will have more of an impact and will require greater mitigation measures.

13.16 At this stage the lack of detail surrounding the scale and design of the solar panels; as well as the lack of information relating to the supporting infrastructure, including the substation; invertors; and Battery Storage facilities, raises serious potential landscape concerns.

13.17 Should you have any queries with the above Natural Environment comments please contact the Natural Environment Team at neti@norfolk.gov.uk

14. Historic Environment

14.1 The Historic Environment team have the following comments to make:

14.2 The Historic Environment team note that Chapter 9 of the EIA Scoping Report that below-ground archaeology is scoped in.

14.3 The Historic Environment team also note that table 9.15 makes mention of 'Trial Trench Evaluation'. The Historic Environment team did meet with the applicants archaeological consultants late 2024 and would like to reiterate the team recommend that archaeological trial trenching is undertaken as early as possible, allowing for issues of access to land, weather and ground condition and windows within cropping regimes, irrespective of what stage the EIA or NSIP process has reached.

14.4 Should you have any queries with the above comments please contact John Percival (Historic Environment Senior Officer) [redacted]@norfolk.gov.uk

SEETHING PARISH COUNCIL

Clerk: Mrs Jo Andrews
Tel: 01508 550840
Email: [redacted]@hotmail.co.uk

Thistlewood Cottage
Loddon Corner
Kirstead Green
Norwich
NR15 1EE

Planning Inspectorate
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol BS1 6PN

February 11th 2025

Your ref: EN0110014

Re: Application by East Pye Solar: Environmental Statement and scoping process. Seething Parish Council response

Dear Planning Inspectorate,

Further to your letter of January 15th 2025, please find attached the Seething Parish Council comments regarding the Environmental Statement and scoping process.

Yours faithfully,

Seething Parish Council

Seething Parish Council Environmental Scoping response
Planning Inspectorate - Feb 2025

We are faced with an accelerating climate emergency, and Seething Parish Council unanimously recognise that local, regional, national and global actions are urgently required to abolish our reliance on fossil fuels. Ground-mounted solar PV is a necessary part of such a strategy with the potential to be delivered in an appropriate timescale. However, to be acceptable to local populations, such schemes must be appropriately developed and managed to minimise environmental impact. Therefore, following consultation with our parishioners, Seething Parish Council would request that the following are included within the Environmental Scoping Process:

With regard to net zero targets:

- We must be presented with appropriate data that documents appropriate carbon costs and savings that that would justify the IGP East Pye proposal
- We must be provided with data demonstrating that the carbon costs pertaining to loss of agricultural productivity are favourable when compared with CO_2 net gains from the proposal
- If the proposed scheme were to be approved, data that demonstrates ongoing efficiency and net carbon savings throughout its proposed lifespan, must be available in the public domain, thereby justifying the validity of continuation of the scheme

With regard to visual, ecological and heritage impact:

- Solar PV arrays of 4.5m height, as detailed in the East Pye literature are absolutely unacceptable to our parishioners and would not be amenable to effective screening. A lower height maximum of approximately 2.5m equivalent to existing solar PV schemes is an absolute necessity. (paras **3.4.2; 3.4.3**)
- Proposed PV enclosures must not impede existing and historical rights of way across site areas (paras **3.12.4; 10.4.5 – 10.4.9**). Pertinent to this:
    - **Fig 10.2** within the Scoping Report (Vol II) inaccurately represents Wash Lane, which is a Norfolk CC maintained unsurfaced road (https://maps.norfolk.gov.uk/highways/) running west from Seething Road (**TM 31079 94781**) toward Woodton RB3 (**TM 29876 94958**). Wash Lane is therefore a PRoW forming the southern boundary of site **10b** and northern boundary of site **10a**: consequently, paragraph **2.12.17** of the scoping report requires amendment and potential impact upon this PRoW needs to be considered.
    - **Fig 10.2** within the Scoping Report (Vol II) does not acknowledge historical rights of way
    - Such rights of way need to be acknowledged with regard to protection of currently unrecorded historic rights of way (https://www.gov.uk/government/news/government-steps-in-to-save-historic-rights-of-way-from-being-lost-to-the-nation) either as definitive rights of way or permissive rights of way (paras **3.12.4; 3.13.1**)

Seething Parish Council Environmental Scoping response
Planning Inspectorate - Feb 2025

- The solar PV areas must be managed to support biodiversity net gain (paras **1.8.8; 1.8.34; 1.8.49; 8.6.3; 8.7.3**) which necessitates:
    - wildlife-friendly meadow and/or grazing rather than herbicide management of PV fields (para **3.12.2**)
    - that existing hedgerows / trees and native species are protected and enhanced (paras **5.13.2; 8.7.1; 8.7.3** etc)
    - new planting of native species (paras **3.12.2; 7.3.5; 7.5.2; 7.5.3; 12.7.2**)
    - enclosure of the PV areas must not impede wildlife corridors across each individual site and across the region as a whole (para **3.8.1; 3.8.2**)
    - consideration of deer and other large mammal species: although the document acknowledges risk of impact upon bats, badgers, water voles, crested newts etc within section **8.5**, the document does not appear to assess the impact of very extensive deer fencing upon the habitats and territories of our local populations of Roe, Muntjac, Chinese Water and other deer species.
- To optimise screening and minimise ecological and heritage impact, the security fencing must be located **inside**, rather than outside the perimeter hedgerow and tree planting (para **3.8.1; 3.8.2**)
- We require assurance that the land use will remain, and/or return to agricultural classification at the end of the stated lease period
- Cable corridors must minimise ecological impact, avoid destruction of local ecosystems and wildlife corridors. (para **1.8.49; 8.6.3**)
- Cable installation must be compensated by biodiversity net-gain (paras **1.8.8; 1.8.34; 1.8.49; 8.6.3; 8.7.3**)
- Cable installation must be underground and should avoid heritage / archaeological features (para **9.6.2**)
- Cable corridors must not impede existing or historical rights of way (paras **3.12.4; 3.13.1**)

It is imperative that the ecological impact of the East Pye development be considered in conjunction with other Anglian Region Large Scale solar PV developments to ascertain and mitigate the impacts of region-wide solar development

In order to be acceptable to the community, any large-scale development necessitates community "engagement and ownership" resulting in an improvement of local ecology, and enhanced biodiversity alongside local employment. Pertinent to both the solar PV sites and cable corridors, local involvement in a research-based assessment to document existing biodiversity prior to development, and subsequently to monitor its impact is mandatory. If there is evidence of depletion of local biodiversity, then local strategies need to be available to modify and address negative ecological impact.

Seething Parish Council February 2025

East Pye Solar Project

Environmental Impact Assessment (EIA) Scoping Report

Date: February 2025

PINS Reference: EN0110014

Response submitted by Shelton and Hardwick Parish Council



Gillian Marklew-Allen, *View from the footpath on EAST PYE SOLAR proposed site 3b looking toward the artist's house in Lundy Green. Hempnall.* Watercolour. January 2025.

Contents

Opening Statement in response to the proposed East Pye Solar project4

Detailed Response to the Environmental Impact Assessment (EIA) Scoping Report4

NSIP and EIA Process4

Justification of how this is considered to be one NSIP project5

Justification for this project to meet the government's Net Zero 2030 and 2035 targets5

Justification for the choice of this specific location for this scale of project8

Proposed scope of the East Pye Solar EIA9

Exploration of Reasonable Alternatives10

Cumulative impact across all aspects of the EIS11

Climate change adaptation13

Major Accidents and Disasters13

Air quality and associated risks to human health14

Telecommunications, Television Reception and Utilities14

Electric, Magnetic and Electromagnetic Fields15

Glint and Glare16

Glint and Glare impact specifically on airfields16

Wind Microclimate17

Impacts and cumulative impacts on remoteness and tranquility17

All aspects of Cultural Heritage18

All aspects of Human Health and cumulative impact on human health.19

Rider and horse safety and enjoyment20

Community, identity, culture, resilience and influence21

Water quality or availability impacts to human health21

Effectiveness of Environmental Mitigation22

Contamination/damage to soil22

Ground conditions24

Environmental24

Environmental impact to common species25

Wintering/Passerine birds25

Impacts of any lighting, including temporary lighting on wildlife and communities26

Impacts of permanent motion-sensor lighting on wildlife and communities26

Impact of decommissioning on any Biodiversity Net Gain26

Water and Flooding26

Private water supplies and drinking water26

Arboricultural28

All socio-economic impacts28

Employment and income28

Economic impact to homeowners29

Section specifically on BESS Site/Substration & Grid Connection Infrastructure31

Opening Statement in response to the proposed East Pye Solar project

The area proposed to site the East Pye Solar utility-scale power plant is a valued, tranquil and unspoilt agricultural landscape of small Domesday Book villages, hamlets and isolated farmsteads with dark skies and a unique biodiversity (South Norfolk Claylands), including maternity roosts of critically endangered barbastelle bats in multiple locations. It has many village conservation areas, Grade I Listed churches, and a nationally significant collection of Grade II* and Grade II Listed medieval farmsteads. These building 'are of great historic and architectural interest and form one of the most widespread and impressive survivals of pre-1750 farmstead buildings'.[1]

East Pye Solar admit they are unable to list all the Grade II Listed buildings impacted by this scheme beyond 100m - they have had to create an entire separate volume, because there are simply too many of them. The landscape has associations with the Norwich painter John Crome and Sir Alfred Munnings, and many of the buildings affected by this scheme are listed in Pevsner's *Buildings of England* (first published 1962). This is indicative of the value of this landscape and its cultural heritage and demonstrates that this utility-scale power plant project, stretching across some 15KM of our landscape is entirely inappropriate for this location.

Detailed Response to the Environmental Impact Assessment (EIA) Scoping Report

NSIP and EIA Process

The level of detail contained in East Pye Solar's EIA Scoping document is insufficient to show compliance with legislation and the "best practice" as quoted by EPS.

The use of almost 5000 acres of scattered parcels of agricultural land to build a 2300-acre solar farm is both environmentally reckless and financially unsuitable.

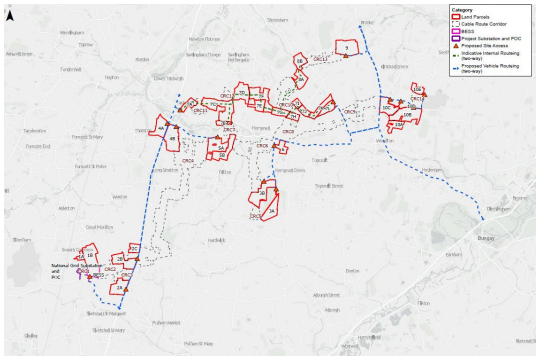
The repeated use of 'could, may and consider' implies minimal contractual obligation for the principal contractor to comply and a very low ROI.

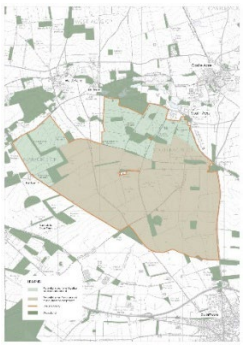
There are insufficient skilled UK contractors, equipment or materials (particularly cement) to satisfy the needs of all the planned development projects.

[1] Natural England, *National Character Area Profile 8: South Norfolk and High Suffolk Claylands*.

The applicant should justify how this is considered to be one NSIP project

How can this be considered one project given that it is at 10 sites stretching across some 15km and 14 separate parishes and therefore requires such quantities of cabling as to cause significant damage to such an extensive area of landscape? This project is neither discrete, efficient, nor compact like Island Green's other proposed Norfolk NSIP solar project The Droves.





Due to the level of detail required to respond to the proposals for the BESS Site/Substation & Grid Connection Infrastructure, Sites 1A, 1B, 2A, 2B, 2C will be addressed separately at the end of this documents.

Justification for this project to meet the government's Net Zero 2030 and 2035 targets should be scoped in

East Pye Solar states that 'the UK government intends to increase solar capacity to 70GW by 2035'.[2] It fails to state that the Government only plans to site 900MW of that in the East of England to meet its 2035 target.

The UK government's target for 2030 is 47GW.[3]The transmission entry capacity register (TEC register) currently (January 2024) has over 500 solar projects in the queue 'with a combined capacity of just under 200GW'.[4] NESO states that 'the 2030 connection queue has higher capacities of solar and onshore wind than is required.'[5]

[2] Josh Cornes, 'Breaking down the solar grid connection queue', 8 January 2025, *Solar Power Portal*.
[3] UK Government, *Clean Power 2030 Action Plan: A new era of clean electricity*, pg. 32.
[4] *Idem.*
[5] NESO, *Clean Power 2030*, pg. 27.

The UK Government *Clean Power 2030 Action Plan* explains that the UK as of 2024 already has 16.6GW of solar in operation, has a further 23.8GW committed or under construction, and only needs 47GW of solar power in total to meet its 2030 target:[6]

The UK Government states: 'to achieve Clean Power 2030, technological and locational factors need to be considered in the connection process so the right projects can connect in the right place at the right time.'[7] UK Government clearly states that it only requires an additional 100MW of solar power to be situated in the whole of the East of England to meet its 2030 Net Zero target and only another 900MW to meet its 2035 target.[8] It also only requires another 200MW of battery storage to meet its 2035 target for the East of England.[9] There is already a 228MW BESS applying for planning permission 700m west of Long Stratton.[10]

Table 2: Regional capacity breakdowns for transmission connected technologies required for 2030[20] and 2035[21]

Transmission network region	Solar (MW) 2030	Solar (MW) 2035	Onshore wind (MW)[22] 2030[23]	Onshore wind (MW) 2035	Batteries (MW)[24] 2030	Batteries (MW) 2035
N. Scotland	100	800	5,500	-	1,900	1,900
S. Scotland	600	800	8,800	-	3,900	3,900
N. England	500	1,400	-	-	800	800
N. Wales, the Mersey and the Humber	1,200	1,700	300	-	4,200	4,200
Midlands	4,000	5,200	-	-	1,300	1,300
Central England	2,100	3,300	-	-	500	500
E. Anglia	100	900	-	-	200	200
S. Wales and the Severn	1,100	1,300	1,300	-	900	900
S.W. England	300	300	-	-	400	400
S. England	200	200	-	-	100	100
South East England	600	1,100	-	-	1,700	1,700
GB total	**10,800**	**17,000**	**15,900**	**-**	**15,900**	**15,900**

Note: MW capacity figures have been rounded to the nearest 100 MW.

By the time 500MW East Pye Solar comes to Inspection at the end of this year, both the 100MW target for 2030 and the 900MW target for 2035 for the East of England will already have been met by solar projects ahead of it in the queue currently being examined.

The government also does not specify that this additional 900MW of solar capacity for the East of England must be ground-mounted, nor that it should be sited on productive agricultural land. Indeed, they state that brownfield sites should be used for new

---

[6] UK Government, *Clean Power 2030 Action Plan: A new era of clean electricity*, pg. 73.
[7] UK Government, *ibid.*, pg. 66.
[8] UK Government, *Clean Power 2030 Action Plan: A new era of clean electricity*, connections reform annex pg. 13
[9] *Idem*.
[10] Green Switch Capital, Wacton Road Energy Storage Facility. Home | Green Switch Capital

infrastructure, and that food security is national security.[11] Italy has now banned ground-mounted solar on agricultural land[12], and France only permits it if it can be guaranteed that the land will continue to produce the same quantity of crops once the solar infrastructure is installed.[13]

The UK Government acknowledges that for the period between 2030 and 2050, it should focus on renewables projects that have long lead-times and use new technology, such as hydrogen and Small Modular Nuclear Reactors. In the hydrogen and nuclear evolution scenario, the demand for solar will be significantly reduced.[14]

The EPS scoping document outlines: 'Part 3 of EN-1 identifies the need that exists for nationally significant energy infrastructure. With regards to decision making, paragraph 3.2.2 of EN-1 states:

"We need a range of different types of energy infrastructure to deliver these objectives. This includes the infrastructure described within this NPS but also more nascent technologies, data, and innovative infrastructure projects consistent with these objectives".

This is neither an example of nascent technology, nor an innovative infrastructure project. Beyond 2035 renewables technology will have advanced to such an extent that out-dated ground-mounted solar projects on BMV agricultural land such as the East Pye Solar scheme will have been replaced by more efficient technology that does not jeopardise food security.

Despite this clear set of UK Government requirements for only 100WM of additional Solar in the whole of the East of England by 2030, and only 900MW by 2035, East Pye Solar is one of four NSIP utility-scale solar projects with agreed TEC register grid connections currently scoping in the small area between Long Stratton and Gissing in South Norfolk. The potential generation capacity of these NSIP solar projects totals over 2.2GW, more than double the 900MW required to meet the Government's 2035 Net Zero targets for the whole East of England.

Even Solar Power Portal, the solar industry's own website, states: 'With less focus on transmission connected projects, almost the entire capacity targeted for before 2030 is already in planning, creating little room for any projects at the pre-planning stage.'

---

[11] UK Food Security Report 2024, 'Food security is national security', Labour says in manifesto - FarmingUK News

[12] Italy bans PV from agricultural land – pv magazine International

[13] France issues new rules for agrivoltaics – pv magazine International

[14] Neso, *Future Energy Scenarios: pathways at a glance*, pg. 14.

Justification for the choice of this specific location for this scale of project should be scoped in

Although East Pye Solar quotes paragraph 4.1.5 of EN-1 which 'states that in considering any proposed development, and when weighing its adverse impacts against its benefits, the SoS should take into account:

"Its potential benefits including its contribution to meeting the need for energy infrastructure, job creation, reduction of geographical disparities, environmental enhancements, and any long-term or wider benefits.

Its potential adverse impacts, including on the environment, and including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce, mitigate or compensate for any adverse impacts, following the mitigation hierarchy".[15]

East Pye Solar have already openly admitted that local communities will gain no socio-economic benefits whatsoever from this project, neither in terms of employment, skills nor even any energy from it.[16] They have also admitted, in a landscape with ancient woodland, endangered species and particularly barbastelle maternity roosts, that this project is likely to cause significant damage to our ecology including (quote):

- Habitat loss, disturbance or fragmentation (during construction and decommissioning);
- Disturbance, displacement, or mortality of wildlife (during construction, operation, and decommissioning);
- Disturbance, damage or loss of protected species breeding sites, hibernation sites or resting places (during construction, operation (panel replacement), and decommissioning);
- Noise and/or visual disturbance to species using the Sites (during construction, operation (panel replacement), and decommissioning);
- Impacts to designated sites or habitats through generation of dust or other pollutants (during construction, operation (panel replacement), and decommissioning); and
- Disturbance and pollution (indirect effects such as noise and vibration, dust, pollution, surface water run-off during construction, operation (panel replacement), and decommissioning)[17]

There are so many Listed Buildings surrounding this proposed scheme that the applicants have had to create an entire extra gazetteer to list them all: i**t is 67 pages long.** EPS state: 'It is considered that there is the potential for likely significant effects upon the historic

[15] 1.8.26
[16] East Pye Solar EIA Scoping document, 5.11.6, pg. 133-137.
[17] East Pye Solar EIA Scoping document, 8.8.7, pg. 208.

environment resulting from the Scheme, based on the current proposals at the time of writing. These may include:

- Direct impacts upon archaeological features and deposits resulting in their partial/total loss as a result of construction; and
- Indirect impacts on the significance of designated heritage assets through changes to their settings, as a result of the presence of construction or decommissioning activities, or operation of the Scheme.'[18]

EPS quote EN-1 that 'public benefit must be weighed against any loss or harm to the significance of a designated heritage asset (Section 5.9.32 to 5.9.33). However, this project is of a scale in excess of requirements to the UK government's own 2030 and 2035 Net Zero targets; there is therefore no public benefit, either to the wider UK population or to the local community, as EPS have openly admitted.

From the outset, it is clear that this project is completely inappropriate for this location.

A justification for why there is any need for an NSIP solar project in this specific location, or indeed for the East Pye Solar project at all, should be scoped in. This should be addressed particularly in relation to other proposed NSIPs in Norfolk ahead of East Pye Solar in the inspection queue. RWE's High Grove solar NSIP (720MW) and Island Green's other proposed solar NSIP, The Droves (500MW), both in Norfolk, combined would generate 1.2GW of power, just by themselves exceeding the government's remaining 900MW goal for the entire 2035 solar requirements of the East of England.

Impact on the Broads National Park should be scoped in

Site 3a lies only 2 miles from the Broads National Park. Broads Authority's documents state that projects planned within 3 miles of their boundaries should consult with them.[19]

Proposed scope of the East Pye Solar EIA

The topics East Pye Solar propose to scope into the assessment are:

- Cultural Heritage
- Landscape & Visual
- Ecology & Biodiversity
- Transport & Access
- Noise
- Climate Change
- Soils and Agricultural Land

---

[18] *Ibid*, 9.6.2, pg. 232

[19] https://www.broads-authority.gov.uk/__data/assets/pdf_file/0025/184813/photovoltaics-1,-2-App-3-Part-2.pdf https://www.broads-authority.gov.uk/planning/planning-policies/landscape-sensitivity-studies

Areas East Pye Solar have requested to scope out the following categories:[20]

- Air Quality
- Water Environment
- Major Accidents and Disasters
- Electric, Magnetic and Electromagnetic Fields
- Telecommunications, Television Reception and Utilities
- Wind Microclimate
- Daylight, Sunlight and Overshadowing
- Glint and Glare
- Lighting
- Minerals
- Waste and Materials
- Socio-Economics
- Human Health
- Arboriculture; and
- Ground Conditions

It is notable that, contrary to what East Pye Solar claim, all these aspects pose significant impacts, which are either extremely challenging to mitigate or which question the viability of the entire project. We call for these areas to be scoped into the Environmental Impact Assessment, with our reasons outlined below.

East Pye Solar also propose to scope out subsections of categories that would be otherwise included in the Environmental Impact Statement. Again, this appears to be because they pose significant impacts that are impossible to mitigate, and they are therefore hoping not to address them publicly in detail.

Exploration of Reasonable Alternatives should be scoped in

East Pye solar quote paragraphs 2.10.19 – 2.10.48 of EN-3, which set out the following key considerations involved in the siting of a solar farm, in addition to considerations specific to individual projects:

- *'Irradiance and site topography*
- *Network connection*
- *Proximity of a site to dwellings*
- *Agricultural land classification and land type*
- *Accessibility*

[20] *Ibid,* 5.1.1, pg. 96

- *Public rights of way*
- *Security and lighting'*

This project, by its own admission, would cause glint and glare to six airstrips to an extent that the Norfolk Gliding Club would cease to be able to operate; it is mainly located 15KM from its proposed network connection; it impacts hundreds of residences, the majority of which are Listed Buildings, and adjoins and even completely surrounds some individual homes and businesses; it is all sited on BMV agricultural land of grades 2, 3a and 3b; the narrow, single-track country lanes make it completely inaccessible for heavy goods vehicles without having to build new roads across agricultural land; it impacts around 30KM of public rights of way, either temporarily or permanently; it proposes floodlighting both during construction and operation in a dark skies area with no streetlighting with maternity roosts of barbastelle bats, a wide range of other protected bats, owls and other night-dwelling creatures.

In every aspect of the list they quote, this project fails to satisfy any of its own requirements. The magnitude of change and impact would be extremely high.

Due to this, these questions regarding reasonable alternatives should be scoped in:

- How have reasonable alternatives been considered?
- Present assessments of alternative location and sites. Date and reasoning for selection of this site.
- How have considerations been made of options with less damaging effects on the environment been carried out, to deliver the greatest environmental gains.
- Which brownfield sites, and sites not on BMV agricultural land have been considered?
- Provide a summary record on their decision-making on alternatives.
- Why do the panels need to be 4.5m and 3.5m high? This is an Irish-owned company and in Ireland the maximum panel height is 2m.
- Why is this plan the best it can be?
- Summary of cumulative effect of how this project benefits the landscape and community in terms of design and amenity.

Cumulative impact should be scoped in across all aspects of the EIS

There are already multiple solar projects either in operation, or consented for construction in South Norfolk, as well as another three with grid connections agreed in the same area.

Built:

- Tasburgh
- Trowse 1 and 2
- Bracon Ash solar and BESS

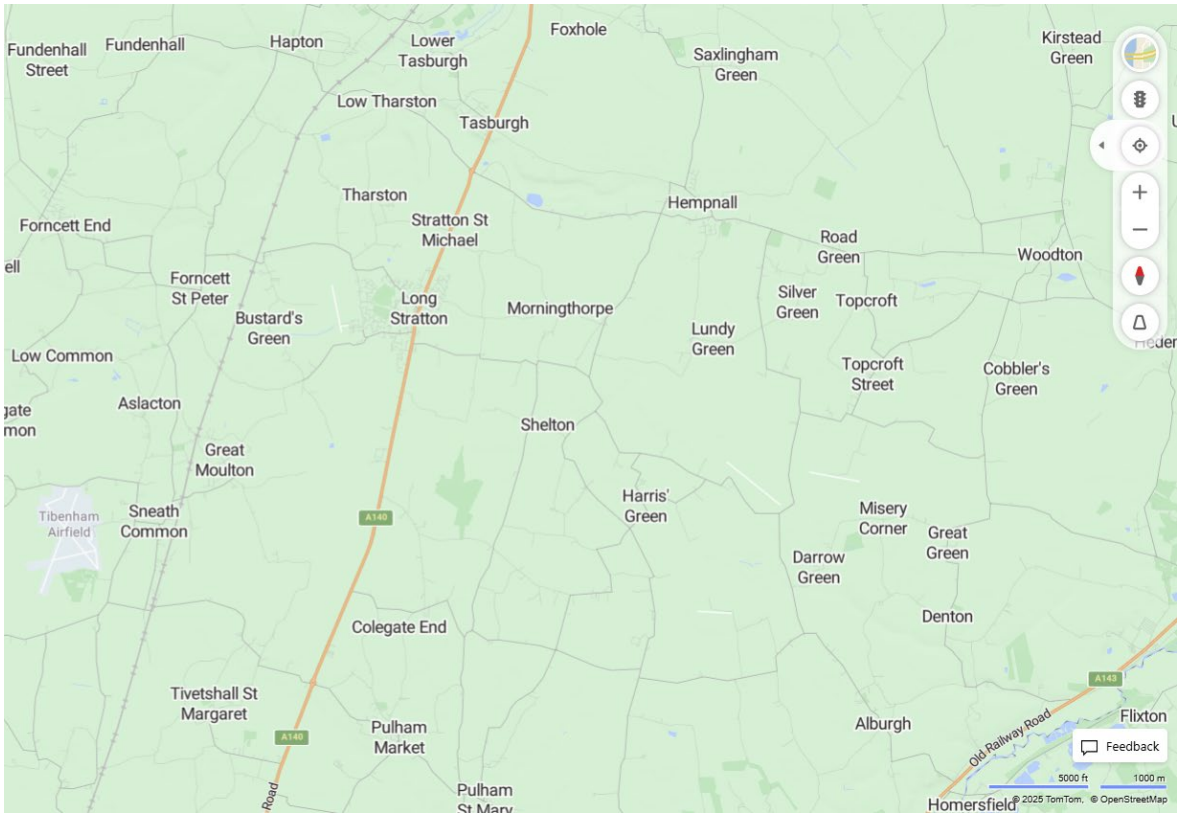
Consented:

- Bloys Grove 49.9MW

Scoping: These projects have not been added into the potential cumulative impact in EPS documentation

- Long Stratton 400KW + BESS (Location unknown, South and West of Long Stratton)
- Green Switch Capital, Wacton Road Energy Storage Facility (BESS), 228MW
- Noventum – Long Stratton 500KW + BESS (scoping immediately adjoining East Pye Solar scheme, north of Long Stratton and Hempnall, around Shotesham (EPS site 8)
- Gissing 900KW + BESS (location unknown, directly south of Easy Pye Solar scheme between Long Stratton and Diss)
- Maltings solar farm at Tivetshall (directly adjoining East Pye Solar BESS site to the west).

As listed above, East Pye Solar is one of FOUR NSIP projects with agreed grid connections for utility scale solar power plants just in the small area outlined on this map, between Gissing (lower left) and Long Stratton. These projects could remove around 17,000 acres of agricultural land from farming use. This quantity of solar infrastructure in this rural/agricultural area on the edge of the Broads National Park is inappropriate and completely excessive.



In addition to this, RWE are in pre-application stage for High Grove Solar Farm 700KW in South-West Norfolk. East Pye Solar's parent company Island Green already owns Trowse 1

and Trowse 2 solar plants, to the north of this proposed site. They are also developing plans for the Droves 500KW, another NSIP utility-scale site in South-West Norfolk.

Other infrastructure consented or planned for the area:

- Norwich to Tilbury Pylons
- Orsted BESS (south of A47)
- 1,800 houses plus associated infrastructure, new school, surgery, landscaping associated with the Long Stratton by-pass. Immediately to east of East Pye Solar Scheme.

These developments, particularly the excessive number of proposed NSIP solar farms are likely to have significant cumulative impacts on all aspects of the EIA, particularly ecology including common species, tourism, landscape and visual amenity, cultural heritage, transport (including PRoW), noise and vibration and particularly on human (mental) health, economic and wellbeing for all phases of the project. The cumulative impact of all these schemes should be scoped in from the start.

Climate change adaptation should be scoped in

As recently ruled in Scotland regarding the Rosebank and Jackdaw oil and gas fields, there should be a full impact assessment of the climate altering emissions and impacts to human health and human rights in the countries in which the panels and other equipment are manufactured, as well as the carbon footprint of the project, including global shipping and disposal of waste. Population health is not only our own populations but its impact on all populations involved in this project's creation.

For this reason, Waste and Materials should also be scoped in to demonstrate how and where damaged panels will be recycled, or all equipment will be recycled at the end of its lifespan. Chinese panels should not be used for this project if they contain PFAS and are unable to be recycles in the UK. It is particularly important to know how will unrecyclable materials such as PFAS (forever chemicals) be dealt with, and how all land will be decontaminated and returned either to its former agricultural grade or an improved grade once the project is decommissioned. Figures in the EIA to calculate waste production are currently incorrect by a factor of two.

Major Accidents and Disasters should be scoped in

Section 5.14 Human Health and **Section 5.4 Major Accidents and Disasters**. Absolutely should be scoped in. EPS admits 'In the unlikely event of a fire within the BESS, unplanned air emissions could result in the release of Hydrogen Fluoride (HF), which may impact nearby receptors depending on the location of the BESS in relation to sensitive receptors and the design of the BESS. However, this is unlikely to occur. A key design principle applied to the

design is that BESS will not be located closer than 100m to sensitive human receptors (as described above) which will be secured through the DCO.'

The current proposed site for the BESS is upwind from a village. The Fire Service is not a statutory consultee on this project.

There have been a significant number of BESS fires now globally, with some in the UK taking as long as 59 hours to put out. How would such a fire be extinguished, given that BESS fires are currently left to burn out. The BESS should be sited significantly further away from habitation if the fire is to be left to burn.

Would fire suppressants be used? If so, which? The proposed BESS site is on a drinking water protection area and river catchment protection area, there is a significant risk of PFAS pollution of both drinking water, ground water and local rivers if there were to be a BESS fire. The environmental impacts of such a disaster to local residents and wildlife, as well as soils and rivers should be scoped in.

Air quality and associated risks to human health should be scoped in

'An assessment of air quality effects during operation is therefore scoped out of the ES.' Impact of potential damage to air quality from BESS fire should be scoped in, and associated risks to human health.

Other major impacts such as storm damage should be scoped in, especially in light of the Storm damage to the Solar farm on Anglesey.[21] How would contamination to soils and ground water from toxic materials in the solar panels be averted in the result of such a storm?

The impact on surrounding homes, listed buildings and ecology of any explosion from the unexploded ordnance on sites 3a and 3b should also be scoped in.

Telecommunications, Television Reception and Utilities should be scoped in, and also included within Major Accidents and Disasters

Several of the proposed sites for solar panels (5, 7E and 7F and 8) are on top of the high-pressure gas pipeline that runs through Norfolk from Bacton, which is classed as a Major Hazard (MAHP). The proposed 400KV substation on site 5 and the welfare buildings for workers are also proposed to be built on it. The cable corridor would also potentially cross it.

[21] Solar Farms and Wind Turbines Tested and Failed by Storm Darragh | TheCivilEngineer.org

This is a significant risk not only to the PV farm but also to the surrounding area and public safety.

'PV farms carry an increased risk of a strike and lightning surge currents are of a magnitude and duration that could pass from any lightening protection or electrical the earth system to the pipeline.'[22]

'Pipeline operators are required to consider societal risk, the boundaries for calculating this, is often outside the wayleaves and easements and extend a considerable distance. […] increased population density and infrastructure on these zones could alter the area classification of the pipeline.'[23]

Limits are placed on 'vibration levels allowable near the pipelines – particular attention should be made to distances for piling…' [24]Any damage or potential damage to MAHP pipelines 'is likely to lead to serious safety, environmental and/or security of supply issues.'[25] The siting of a 400KW substation in close proximity to it, is also therefore of serious concern.

There are also pylons and overhead cables crossing several of the sites, that will require continued access to their easements. This may require additional access tracks or areas where development is not permitted. There are also impacts to siting solar infrastructure beneath overhead cables, such as lightning strikes, damage from falling cables or falling ice, earthing of metal fencing, rising of earth potential around base of pylons.

It is therefore essential that Utilities are scoped in and the whole section on Major Accidents and Disasters should be scoped in. It should also scoped into the related aspects of other sections, particularly human health, utilities, air quality and ecology.

Electric, Magnetic and Electromagnetic Fields should be scoped in

Assessments of electric, magnetic and electromagnetic fields should be scoped in, particularly in areas where overhead cables and pylons are proposed to be used, also in areas to be grazed by animals (eg. cable corridors). Animals are more susceptible to EMF radiation than humans and significant impacts to cattle from EMF have been reported.

There should also be a thorough evaluation of EMF effects on sensitive species such as bats. There is evidence that bat activity significantly reduces in habitats exposed to an EMF strength of greater than 2v/m. As we have very large bat populations, particularly of rare bats, Electric, Magnetic and Electromagnetic Fields should be scoped in.

---

[22] UKOPA, 'Good Practice Guide: Managing developments and works in the proximity of high-pressure pipelines', January 2022, pg.
[23] Ibid. pg 8.
[24] Ibid. pg. 10.
[25] Ibid. pg. 10.

Glint and Glare should be scoped in

EPS suggest that: 'No significant impacts from glint and glare are considered possible upon pedestrians/ users along PRoW. The reasoning is due to the sensitivity of the receptors (in terms of amenity and safety) being concluded to be of low significance. '[26]

This assumption is incorrect, as there is a significant safety impact to horse riders on bridleways. There is a significant safety hazard associated with reflections towards a horse and rider on a bridleway, especially if the bridleway is to be fenced on both sides, so preventing the rider from circling in the event that the horse bolts due to glare. This is also a significant glare impact to horse riders on public roads, and assessment of these impacts should also be scoped in.
'Solar reflections towards sections of the A140 and B1527 are within a road user's primary field-of-view and visible. Therefore, mitigation would be recommended for these sections of road.' There should be a detailed assessment of the impact of glint and glare in this location and proposed mitigation should be modelled to test whether it would actually be effective and whether there would be any interim impacts. If screening is proposed as mitigation, then an assessment should be made of how long it would take for this to prove effective, given the height of the infrastructure.

EPS states: 'The duration of solar reflections towards some residential dwellings occur for more than three months but less than 60 minutes on any given day. Therefore, mitigation would be recommended for these dwellings.' This is a significant impact and should be scoped in. Detailed plans should be submitted of the proposed mitigation for each affected residence. If screening by native hedges/tress is proposed, it would take a decade to grow tall enough to have any effect. Therefore, there needs to be a proper assessment of the interim impact of glint and glare on affected homes until any 'native species' screening is effective. There should also be an impact assessment of whether the solar arrays sited around houses would increase the heat of the air or soil at those properties, which could cause impacts to buildings and residents.

Glint and Glare impact specifically on airfields should be scoped in

Since East Pye Solar has chosen to situate its project in an area with six active airfields, it is imperative that glint and glare should be scoped into the Environmental Impact Assessment, particularly where this poses an existential threat to existing airfield operations.

[26] East Pye Solar EIA Scoping document, 5.7.23, pg. 123.

'Solar reflections towards some aerodromes are greater than the acceptable limits of 'low potential for temporary after-image' and would therefore require consideration to the aerodrome's specific operations.'[27] The EPS document specifically says that Norfolk Gliding Club may be impacted by glint and glare, affecting their flying activities, and that this cannot be readily mitigated: 'Existing operation of the Norfolk Gliding Club may be affected as a result of glint and glare from the Photovoltaic panels affecting flying activities.' [28] Therefore, it is completely unacceptable to attempt to scope Glint and Glare out of the Environmental Impact Assessment. Especially as Norfolk Gliding Club state that the person sent to do the initial assessment has neither experience nor understand of the issues associated specifically with gliders. A full glint and glare assessment specifically relating to the six airfields impacted by this scheme should be scoped in, for the full range of different aircraft that use those facilities. No existing airfield should lose its function or ability to operate due to a new planning proposal.

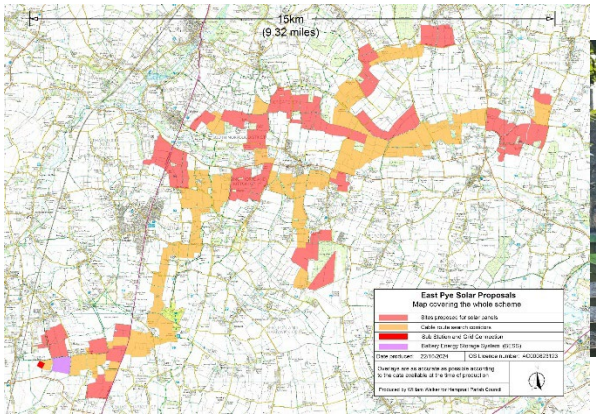
Wind Microclimate should also be scoped in due to impact for airstrips and gliding club.

Impacts and cumulative impacts on remoteness and tranquillity should be scoped in

By East Pye Solar's own admission, this is an undeveloped area with a valued sense of remoteness and tranquillity. It has stayed historically intact and unspoilt because it avoided the effects of the Industrial Revolution. It is important that these few remaining untouched areas of rural England should be protected from development to preserve their integrity for future generations. The vast scale of this scheme and the distances it stretches across the landscape, some 15 KM would have a significant impact on the areas' valued sense of

[27] East Pye Solar EIA Scoping document, 5.7.24, pg. 123
[28] East Pye Solar EIA Scoping document, 5.11.6, pg. 135

remoteness and tranquillity, and these aspects should be scoped into the Environmental Impact Assessment.





All aspects of Cultural Heritage should be scoped in

Ours is a rural landscape with wide-open spaces and expansive views. The scale, size and industrial appearance of the proposed East Pye Solar power plant would have a significant impact on the settings of conservation areas (several directly adjacent to the proposed sites) and the settings of multiple Listed Buildings of all grades. EPS state:

'Due to their prevalence in the area, Grade II Listed Buildings are reported up to 100m only.'

(l-r: directly opposite site 5b; directly opposite site 4b; directly adjacent to site 5b.)

The large number of Listed Buildings impacted by this proposed scheme is because this is an area of high historical significance. It is inadequate to only list the impact to Grade II Listed Buildings within 100m of the site, as due to the flat and expansive nature of the landscape and the height of the proposed infrastructure (4.5 or 3.5m high), it is very likely that it will significantly negatively impact the settings of multiple Grade II Listed buildings at a greater distance than 100m from the sites. Its impact on the area as a whole will damage the importance of this area as a largely untouched nationally significant collection of pre-1750s

agricultural buildings. As these buildings are primarily farmsteads and rural churches, their appropriate protected settings are rural and agricultural, not industrial.

The range of assessment of Grade II Listed Buildings should be increased to at least 500m (the best-practice distance of any residence from solar infrastructure), if not further, with sightlines tested for those assets impacted at an even greater distance where there is any visual impact. It should also be noted that the distances measured should be from the edge of the curtilage of the Listed Building, not from the Listed Building itself.

There may also be other impacts to Listed Buildings in terms of vibration from construction and impacts or vibration from traffic (particularly to Listed retaining walls or structures along narrow lanes). Timber-framed and clay lump buildings are particularly susceptible to damage from vibration, and this is the construction method of most of our pre-1750s farm buildings.

As it is proposed that native hedging/trees will be used for screening purposes, there will be at least a decade until such new plantings reach a height adequate to screen infrastructure that is either 4.5 or 3.5m high. The significant negative interim impacts to cultural heritage should also be scoped into the assessment.

Direct and indirect impact to cultural assets during the construction and decommissioning phases should be scoped in, as there are risks to timber-framed and clay lump buildings from vibrations and direct impact from large vehicles.

The cumulative impacts to cultural heritage of all the proposed developments listed above should also be scoped in. Some of these buildings, specifically the timber-framed farmhouse in the image above, are already being impacted by other projects, in this instance the Long Stratton Bypass.

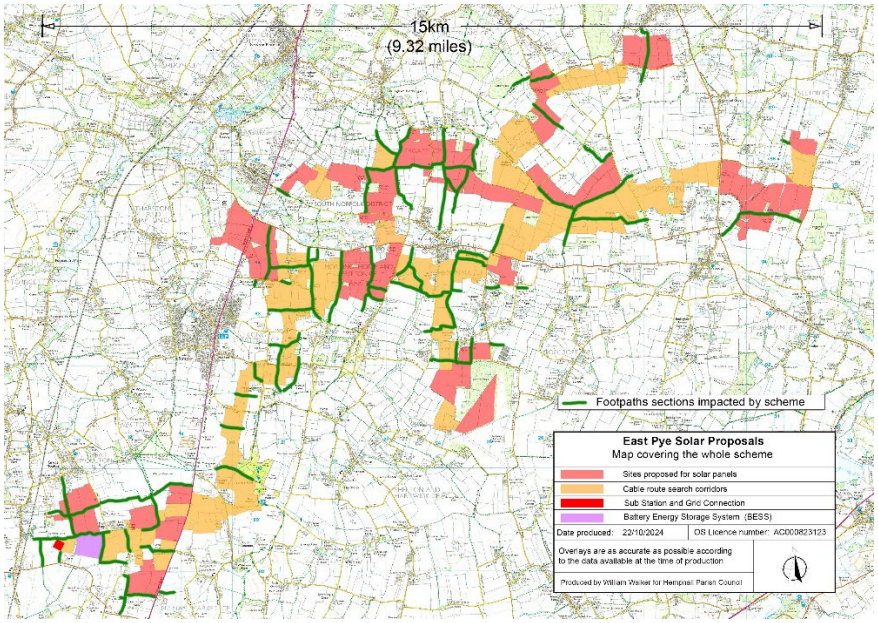
Maps should be provided with all Listed Buildings marked and all other proposed infrastructure included, at whatever stage, so the true threat to cultural heritage can be estimated. Visualisations should also be provided of the proposed type of infrastructure, its distance and screening in relation to the Listed Building.

All aspects of Human Health should be scoped in. Cumulative impact on human health should also be scoped in.

This utility-scale power scheme is already having significant mental health and wellbeing impacts on the community. This is both in terms of the threat of the scale and extent of change, and permanent damage to residents' attachment to place and their visual amenity. The cumulative impact on human health, particularly mental wellbeing, of these four utility-scale solar power plants with connection agreements, potentially covering some 17,000

acres of our landscape in South Norfolk should be scoped in. Residents impacted by the scheme/s are already reporting significant feelings of anxiety, powerlessness and despair.[29]

Impacts to human health of a BESS fire and mental health should also be scoped in as EPS have chosen to site their battery site upwind from a small rural Domesday Book village with a population of less than 1000 and a large number of listed buildings. Community safety is also impacted by the siting of the BESS and should be scoped in.



A significant number of Public Rights of Way will be impacted by this scheme. No one is going to walk along footpaths or bridleways between hundreds of acres of 4.5m high solar panels with 2.5m high fencing and security cameras.[30] It will also be unsafe to ride in these areas. This project will have a very significant impact on the ability of walkers and riders to be able to enjoy the countryside. The actual impact will be that we will lose these rights of way because they will be so visually unappealing covered in industrial infrastructure in our rural landscape that there will be no reason to continue to use them. As this project would impact so many of our PRoW, the impact of this loss of use on human health should be scoped in.

Rider and horse safety and enjoyment should be scoped in

A baseline for rider and horse safety and enjoyment of bridleways should be included. This is not mentioned at all in the project plan. Impacts on safety for riders and horses of specific equipment, glint and glare, layout, fencing, distances adjoining or running through bridleways. Baseline and impact modelling of specific situations including spooking, bolting,

[29] 'People Versus Power', *The Observer*, 29 December 2024. Solar farms v people power: the locals fighting for their county | Solar power | The Guardian

[30] East Pye Solar EIA Scoping document, 5.12.9, pg. 140–3.

rearing in current situation compared to alongside or in the middle of solar equipment and infrastructure that will be installed on each specific site.

All foreseen impacts for riders and horses during construction and decommissioning both on roads and bridleways and mitigations proposed.

Community, identity, culture, resilience and influence should be scoped in

The scale of the proposed 300- to 700-person workforce is equal to or larger than the populations of some of the hamlets affected.

Community, identity, culture, resilience and influence – how the community perceives their surroundings – will be changed for the rest of their lives as this project has a span of 60 years, therefore this should be scoped in. The community feedback submitted to EPS so far is overwhelmingly against this project. There is no sense whatsoever that it will foster a 'sense of pride', as EPS optimistically state. So far the project proposal has created only community division, with individual farmers siting infrastructure directly around their neighbours' houses, causing mental anguish and putting families in negative equity. The project is so far only fostering a sense of communal devastation and mourning at the proposed destruction of our landscape.

Other questions that need to be answered. How will these temporary workers get to work, move around or purchase food? Their car use has not been included in the traffic management plans. Where will the proposed portacabin shanty town be situated? There is currently inadequate public transport to reach these site locations, specifically for these quantities of workers. Seasonal agricultural workers already use the limited public transport, how will it sustain the addition of 300 to 700 additional workers in the area. Who will these people be, where will they come from? What safeguarding checks will be made about them before bringing them into our communities? Additional traffic on tiny country lanes, parking, sewage, refuse etc should be fully assessed. The EPS assessment of the populations of these tiny hamlets are inaccurate – they are in rural areas, away from the large villages they discuss.

Water quality or availability impacts to human health should be scoped in

The project is proposed to be located in an area of private water supplies, on areas protected for drinking water quality. All private drinking water supplies within 1KM of the site should be identified, and all impacts of the development to them scoped in.

EPS has already admitted that construction and decommission will cause run-off and silt. Toxic substances such as concrete, galvanised steel (zinc and lead) and aluminium are proposed to be pile-driven up to 4m into drinking water protection zones within close

proximity to wells and boreholes. Contamination from microcracking caused by weathering and storm damage also poses the risk of toxic materials leaching from the panels themselves into ground water and aquifers. Solar panels are regularly coated with PFAS, which can leech into the ground water and aquifers. Underground plastic ducting and cabling also poses the risk of leeching PFAS and PFOS into ground water and aquifers. Fire-suppressant foams also pose a risk of contaminating drinking water supplies.

If water quality is damaged, homes and businesses will entirely lose their only potable water supplies. This is a significant risk to human health and should be scoped in.

Effectiveness of Environmental Mitigation should be scoped in

Mitigation proposals should be created for all endangered species recorded at all sites, both in desk-based and on-site surveys. Peer-reviewed evidence should be supplied that proposed mitigations are effective How will they address levels of uncertainty? How will they meet the costs of ongoing monitoring and data collection to check mitigation is effective? How will they address issues of ineffective mitigation? How will they Guarantee that measures proposed as mitigation to address the environmental impacts development are implemented as originally proposed? How will mitigation measures be enforced? How will funds be attached for this purpose to the project if the shell company dissolves?

Contamination/damage to soil should be scoped in

EPS state: 'The land within the Scheme will be restored and returned to its original use as far as reasonably practicable after decommissioning. This will include removal of the solar PV panels, substations, conversion units and BESS.'

As this is BMV agricultural land, it should be guaranteed that the land should be returned as agricultural land of the same or better quality at decommissioning. This is supposedly the reason these schemes and land use can be categories as 'agricultural' rather than industrial - that they improve soil quality and biodiversity, not permanently damage good agricultural land.

Compression, contamination estimates during construction and decommissioning for each site and specific equipment to be installed on that site should be provided.

Site/soil specific depth of compression at each site should be provided. Evidence from other sites with that specific type of equipment/soil.

Modelling of time for soil to recover from compression should be provided.

Modelling of long-term impacts to different grades of BMV soil should be provided.

Modelling and evidence of time for soil to recover homogeneity after decommissioning should be provided.

Length of time for soil to return to previous agricultural grade after decommissioning should be provided. Guarantee of return of soil to at least previous BMV grade should be provided.

Quantity, locations and contamination impact of cement/concrete on soil should be provided.

Risk assessment of developing site with historic PFAS contamination (eg. on and adjacent to the three former RAF airbases: Tibenham, Seething and Hardwick).

Materials of metal mountings, method and depth of installation, leeching/weathering impacts on soil should be provided for each specific site.

Leeching reports for all equipment/materials to be installed should be provided.

Contamination implications of weathering, microcracking and damage to panels on soil contamination should be provided.

Weathering and deterioration impacts of other equipment on soil should be provided.

Estimates of breakage of panels on transit and installation should be provided.

Breakage of panels due to weather events- storms, hail, debris falling on to panels, bird strikes should be addressed

PFOS/PFAS from underground cables. Long term impacts of leaving them in the soil should be addressed

Continuing soil monitoring should be undertaken and a plan and funding provided.

Impact of silt at each site should be assessed.

Modelling of soil contaminants from site, specifically lead and PFAS, on future crop growth on those sites, and also surrounding agricultural land should be assessed

Impact on the soil beneath the panels if the minimum height is 0.4m. Sheep will be unable to graze beneath panels, how will the soil therefore regenerate? There will not be improvements to soil quality on these areas.

‘New internal access tracks are likely to be a maximum of 6m wide, constructed of hardcore or gravel over a levelling layer of substrate.’ How do they propose to decontaminate this land and return it to agricultural use?

There is insufficient consideration for building new roads on sites capable of carrying and turning articulated lorries and storage of materials. Also, there is an unrealistic understanding of the potential for access from minor country roads without damaging

verges. For example, Fairstead Lane (access to site 7) is too narrow to carry vehicles of the dimensions they specify.

Ground conditions should be scoped in

Given the highly likely existence of unexploded ordnance on both sites 3a and 3b (3b was the former heavy bomb dump for RAF Hardwick) and site 10, and the acknowledged contamination risks of all three former RAF airbase sites, ground conditions should be scoped in. It has recently come to light that there is significant PFAS contamination associated with the soils and ground water of former RAF bases,[31] with residents who have been using private water supplies associated with those sites requiring blood-letting to reduce the PFAS concentrations in their blood.[32] The PFAS contamination is associated with firefighting foams, which were used at airforce bases, including during WWII for firefighting.

Since the East Pye Solar Scheme adjoins three former RAF bases at Seething, Hardwick and Tibenham, it is important to fully assess the baseline levels of ground and water contamination from PFAS in these areas. It is also important to assess the likelihood of releasing any kind of historic contaminants into the soil by pile driving 4m below the plough line. The implications for underlying aquifers also need to be assessed.

There should also be an assessment of the impact of PFAS coatings and backings from the solar panels adding to this contamination. The long-term implications for these agricultural sites, surrounding areas and any future crop growth should be fully assessed.

Environmental

NPS EN-5 'Environmental and Biodiversity Net Gain' section 2.5 has not been followed. Biodiversity Net Gain (BNG) is an approach that aims to leave the natural environment in a better state than it was before. The BNG process requires developers to plan into their project increases in natural habitats and ecological features.

EN-1 This ES has not addressed assessment principles and generic impacts and should be rewritten.

Insufficient research has been carried out on biodiversity and the impacts of utility-scale solar.

---

[31] 'Forever chemical' hotspots revealed to include RAF bases and airports | The Independent

[32] Bloodletting recommended for Jersey residents after PFAS contamination | Jersey | The Guardian

Mitigation measures must be specific and aligned to identify all of the Environmental and biodiversity losses.



Environmental impact to common species should be scoped in

Due to the scale of this scheme across such a large expanse of the landscape, its impact on common wildlife should also be scoped in.

This is an area of ancient woodland with herds of red, roe and muntjac deer. It is a core woodland area and part of the UK Woodland Network for Biodiversity, which aims to allow the free migration of species across the landscape to enable genetic diversity. The impact of this extent of deer-fencing on the landscape and especially on deer and hares should be scoped in. Impact on common animals' ability to freely cross the landscape, mate and feed should be scoped in. With a project covering this extent of the landscape there is a significant concern that wildlife will be forced on to roads.

EPS states: 'Applicants should aim to minimise the use and height of security fencing. Where possible applicants should use existing features, such as hedges or landscaping.'[33] This is currently being ignored and should be enforced.



The impact of this scheme across the whole ecosystem should be properly quantified.

Wintering/Passerine birds should be scoped in

Several of the proposed land parcels are currently in the Countryside Stewardship Scheme for the protection of farm assemblage birds, specifically lapwing. There is no current effective mitigation for lapwing, which are a ground nesting species. The impact of this scheme to passerine birds should be scoped in, as it is likely to have significant effects on them.

Otters should be scoped in

The area is within three miles of the Broads Authority and has tributaries of the river Yare. It is therefore likely that otters may be present in the areas impacted by the scheme.

[33] 2.10.132

Impacts of any lighting employed during the construction phase, on flora, fauna, dark skies, dark landscapes and residential amenity should be scoped in

'3.8.5 Temporary on-site lighting will be required during construction to enable safe working in hours of darkness'. The proposed working hours are between 7am and 6pm weekdays and Saturday mornings. In winter it is dark until 8am and after 4pm. There will be at least three hours of artificial lighting five days per week during the winter months. Many of the proposed sites are adjacent to woodland or locations with significant bat and owl populations. The impacts of temporary lighting of this scale on wildlife should be scoped in.

This is an area with no streetlighting. The impact of any form of night-time artificial lighting on residents and their homes should also be scoped in.

Impacts of any lighting employed during the construction phase, on flora, fauna, dark skies, dark landscapes and residential amenity should be scoped in

'Motion sensing security lighting will be provided within the Substations, ancillary infrastructure and within the BESS for security and maintenance purposes, during hours of darkness.'
There is recorded barbastelle bat activity around the proposed BESS site. The impact of permanent motion-sensor lighting on the ability of creatures to rest, breed or feed should be scoped into the assessment.

Impact of decommissioning on any Biodiversity Net Gain should be scoped in

The impact of decommissioning and return to agriculture on any BNG gain during operation should be scoped in. Will any biodiversity net gain remain after decommissioning?

Water and Flooding should be scoped in

Private water supplies and drinking water should be scoped in

EPS must gather data on the number, types and locations of all private water supplies within 1KM of every proposed site or cable corridor.

EPS says at 5.3.7 'The Site and CRC are not located within any Drinking Water Protected Areas (surface water) or Drinking Water Safeguard Zones (both surface and groundwaters), with the exception of sub-Site 3A which is covered by a Drinking Water Safeguard Zone for surface water.' This is incorrect even by their own assessment which also identifies drinking water safeguard zones at site 1.

EPS identifies Impact pathways during the construction, operational and decommissioning phases to include the following:

- impacts on water quality from sediment/pollutant mobilisation, contamination from potential harmful materials (e.g. lead, lithium and other heavy metals) from solar panels/batteries during construction and decommissioning.
- impacts on local water supplies/groundwater from spills during construction and decommissioning; and
- impacts on water quantity/surface water runoff from increases in impermeable areas during operation

The EPS document says: 'potentially contaminated soils (if present) may be disturbed during the construction and decommissioning phases as a result of construction and decommissioning works, and during the operational phase as a result of in-ground maintenance works. Such disturbance could impact human health.' This will have an impact on private drinking water supplies and also drinking water for farm animals and wildlife.

EPS say mountings are to be driven up to 4m into the ground – impact on aquifers should be scoped in.

Leeching impact of specific proposed equipment on ground water should be scoped in.

Damage, microcracking, leeching impact of equipment on drinking water quality.

Impact on drinking water protection zones of concrete, PFAS, galvanised metal and other toxins from panels.[34]

Impact of altered run-off and silt on specific nearby wells and boreholes, pumps and filtering equipment

Continuous monitoring of potential contamination of drinking water. This is a significant public health issue. Contamination of concrete and plastic-coated cables in perpetuity on ground water, aquifers and drinking water supply. Particularly implications of PFAS solar panel backings and coatings - 'the asbestos of the future'[35] (International Society for Chemistry).



Flooding should be scoped in

'5.3.21 In summary, the Site and CRC are considered to have a 'Very Low' to 'Low' flood risk from all sources.' The flooding information provided is incorrect, as evidenced by the photograph of Long Stratton to the right. There were significant floods across the whole site in 2020 and 2023, during which times many of the major access routes EPS plan to use were

[34] rsc-policy-position-on-pfas-in-uk-drinking-water.pdf

[35] PFAS: The New Asbestos? - Environmental Law - United Kingdom Insurance Risks from PFAS - Per- and Polyfluoroalkyl Substances - Hannover Re

impassible in multiple locations.[36] December 2024 Fairstead Lane was flooded and impassible.

Impact of run-off particularly on areas already prone to flooding should be scoped in. It should also be scoped in for areas on slopes, such as site 8 in Shotesham, and assessments of impact made during all part of the year due to varying ground conditions.

Arboriculture should be scoped in

This is an area with a significant number of ancient hedgerows and trees of significance. They provide an important resource and habitat for wildlife. Unfortunately, we have already witnessed (photographic evidence) of landowners grubbing up ancient hedgerows last March during nesting season in advance of the environmental assessments for this project. We also have evidence of large numbers of hedgerows this winter being cut down to below a meter in height in advance of environmental surveys.

Due to the massive impact on the landscape of the cable corridors and associated infrastructure, there should be full surveys and impact assessments of all hedgerows and trees in all cable corridors and every site.

It is not acceptable to replace mature hedging and trees with new planting as mitigation.

Details of vegetation management plan including spraying and their impacts should be scoped in.

All socio-economic impacts should be scoped in

Section 5.11 East Pye Solar has explicitly stated that this project will bring no benefit to impacted residents, their communities or the people of Norfolk, either in terms of skills, employment, amenity nor even electricity. The only people benefitting are the handful of individual farmers involved in the scheme.

Employment and income should be scoped in

Impacts to tourism and businesses have been completely ignored.[37]

---

[36] PICTURES: Firefighters called to numerous flooding incidents in and around Diss
Norfolk fire service declare flash floods a 'major incident' - BBC News
Major roads in Norfolk underwater after heavy downpours | Eastern Daily Press

[37] East Pye Solar EIA Scoping document, Table 5.8

EPS have already been informed that there are businesses directly impacted by this scheme that would be unviable to open, either during the construction or decommissioning phases as well as made potentially permanently unviable due to the siting of this project and its impact on tourism. As we are only two miles from the Broads National Park and also close to the coast, we have a thriving tourist industry in South Norfolk, with many people coming to stay in holiday lets and Airbnbs for weekend breaks or summer holidays.

East Pye Solar have not provided any lists of local businesses impacted in their scoping report other than Norfolk Gliding Club. Loss of employment and income for those who own holiday lets, Airbnb properties, who run events, own farm shops or restaurants is a significant factor of this project and should be scoped in. East Pye Solar are familiar with impact statements from our residents, including this one published in the national press:

'Roy and Heidi Martin have spent the last three years converting their disused barn into two immaculate holiday lets overlooking fields that will be filled with panels. Roy believes their business will be completely unviable. "People come here for a quiet retreat. It's the last thing they are going to want," he says. "I've put everything into this – my life savings, two years of every penny I could earn, and what are we going to be left with?" he says.'[38]

Socio-economic impacts should also be assessed as a cumulative impact in light of the other proposed solar projects locally. The permanent impact to tourism businesses should also be assessed if all proposed solar projects in the area go ahead and the landscape is industrialised for the next 60 years.

Construction activities are likely to be carried out Monday to Friday 07:00-18:00 and between 08:00 and 13:30 on Saturdays, which means there will be a significant impact on restaurants, tourism and holiday lets, preventing some from being able to trade at all due to construction disturbance, noise and vibration.

Economic impact to homeowners should be scoped in

There should also be an assessment of the impact to homeowners' abilities to continue to insure their properties and any increase to insurance premiums as a result of being sited near to BESS infrastructure, substations or areas where there is likely to be any higher risk of flooding due to the scheme.

The site plan shows that the landowners and EPS have chosen to site infrastructure surrounding private homes, placed it immediately behind them, or directly in front of them. Local residents have been advised by estate agents that the most severely impacted homes

[38] 'People Versus Power', *The Observer*, 29 December 2024. Solar farms v people power: the locals fighting for their county | Solar power | The Guardian

have already lost 30% of their value from the time this project was announced. It is now not possible for homeowners to sell their homes until the project is either rejected or built and the true impact to their properties is known. Many families are threatened with being put into negative equity due to this scheme, as reported in *The Observer*:

'A local estate agent has suggested that the value of the worst-impacted houses could fall by 30%. If that happens, Chris and Jenna Humphrey will be in negative equity, their mortgage will be larger than their house's value. A 2023 peer-reviewed study found that UK house values dropped by an average of 10.2% if less than 750m south of installations greater than 10MW (properties to the south may be more affected because of panel glare), but they will be 50m away.' [39]

Others find themselves in financially ruinous situations having bought Listed Buildings from farmers involved in the scheme only to discover that they have placed solar fields directly beside them – making the properties now worth substantially less than it would cost to restore them.

Other landowners have sited hundreds of acres of industrial solar infrastructure directly in front of holiday lets making them worthless and unviable as businesses. No compensation has been offered to any of these home or business owners. There has been no suggestion that other fields will be substituted to the scheme to avoid these severe impacts. This has had a significant impact on the mental health of the individual homeowners and that of the whole community, who witness this injustice.

The socio-economic impacts of this scheme must absolutely be scoped in. The cumulative socio-economic impacts of the other solar NSIP schemes that also have TEC grid connections agreed in the Long Stratton/Gissing area should also be scoped in as if all were to go ahead, it would have a major impact on property prices locally and tourism businesses. It is completely wrong that family finances and security should be jeopardised by a scheme that benefits only a foreign corporation and a handful of individual landowners.

[39] 'People Versus Power', *The Observer*, 29 December 2024. Solar farms v people power: the locals fighting for their county | Solar power | The Guardian

Due to the proximity of homes and tourism businesses to all of the proposed sites, all aspects of noise and vibration should be scoped in **to the EIA**

11.10 Summary

11.10.1 **Table 11.11** provides a summary of the noise and vibration scope.

Table 11.11: Summary of Scope for Noise and Vibration

Discipline	Scoped In Elements	Scoped Out Elements
Noise and Vibration	Construction traffic noise Construction noise Construction vibration Operational noise from BESS, substations, inverters and transformers Operational traffic noise	Construction, operational and decommissioning traffic vibration Operational vibration Operational noise and vibration from panels Operational noise and vibration from cable route corridor Decommissioning noise Decommissioning vibration

Section specifically on BESS Site/Substation & Grid Connection Infrastructure, Sites 1A, 1B, 2A, 2B, 2C

Extracts from the EP.

2 Site Description

BESS Site & Proposed Grid Infrastructure Site

3.7 Battery Energy Storage System

2.13.1 The potential siting of the BESS Site is adjacent to sub-Site 1B, separated by Hundred Lane. The BESS Site comprises an agricultural field bordered by lines of trees and hedgerows, and a small pocket of woodland along part of its western boundary. Great Moulton is located 1.1km north, and Sneath Common is located 1.1km west.

2.13.2 The BESS Site is a total of 22ha. The BESS Site will also accommodate 400kV Substation 1. However, the infrastructure associated with the BESS and 400kV Substation 1 is unlikely to utilise this entire space in order to allow for emergency vehicle access

3.7.1 A BESS provides an important balancing service, allowing electricity generated by the panels to be stored at times of low demand, and then exported onto the system when demand increases. The BESS will therefore enhance grid reliability and resilience. The BESS will have a capacity of up to 500MW.

3.7.2 The BESS will incorporate heating, ventilation and cooling systems to ensure the efficiency of the technology. These features are integrated into the units within which they are housed. The battery system will comprise DC/AC inverters to control the charge of the batteries from either the solar PV energy output or when drawing energy from the grid

3.16.1 The components of the Scheme are anticipated to have the following approximate lifespans: Photovoltaic Panels – 25-40 years; and Batteries – 15-20 years.

3.16.2 3.16.3 It is therefore assumed, that the solar panels could require replacement up to two times and the batteries up to four times during the operation of the Scheme. The environmental implications of the replacement of the solar PV panels and BESS will be considered within the assessment of operational impacts of the Scheme in the ES. The construction phase is therefore considered as a worst-case scenario for the panel and battery replacement scenario, with any impacts likely to be much less than those reported during construction.

BESS health and safety considerations. It is our understanding that a large-scale BESS fire would not be tackled by the local fire service, instead it would be allowed to "burn out". This would require it being placed further away than 100m from any people and the recommendations as contained in Grid Scale Battery Energy Storage System planning – Guidance for FRS

The following should be scoped in

- recommendations as contained in Grid Scale Battery Energy Storage System planning – Guidance for FRS
- Emission modelling should take account of foreseeable scenarios, including thermal runaways in single and multiple containers.
- Means to retain and treat the large volume of water required to contain a thermal runaway should be secured in the DCO
- Degradation of water in the case of significant Incidents in the case of a Battery Fire.

NPS EN-5 'Environmental and Biodiversity Net Gain' Section 2.5, has not been followed.

EN-1 This ES has not addressed Assessment Principles and Generic Impacts and should be rewritten.

2.14.1 The proposed National Grid Substation is proposed to be located at the National Grid Substation Site (see Figure 1.2 Sheet 13 of 13). This section of the report describes the site characteristics of the National Grid Substation Site. Subject to on-going discussions with National Grid, an alternative location for the Substation, is potentially within part of sub-Site 1B (the characteristics of sub-Site 1B are described below) (shown on Figure 1.2). The potential for the National Grid Substation to be located at the National Grid Substation Site and part of sub-Site 1B are both addressed in this Scoping Report.

The applicant has not provided any details of size or visualization of the National Grid Substation as stated in the scoping document, therefore this should be rewritten to provide comprehensive details on this National Grid Substation, including essential visualizations to

demonstrate its impact on Great Moulton Plateau, visual effects, and nearby residential areas in addition the impacts covered in NPS EN-1.

Site 2 – Alternative Location for the National Grid Substation

EP extract

2.3.1 Site 1 is 56ha in size comprising two adjacent land parcels, sub-Site 1A and sub-Site 1B immediately to the east. Site 1 is located at the southern extent of the Scheme boundary, 170m south-west of Great Moulton, and immediately to the north of the BESS Site (see Figure 1.2 Sheet 2 of 13).

2.3.2 Sub-Site 1A comprises one agricultural field and sub-Site 1B encompasses four fields. Part of sub-Site 1B has the potential to accommodate the National Grid Substation. Whilst the National Grid Substation is likely to be located at the National Grid Substation Site as discussed at Section 2.14 of this Chapter, this is subject to on-going discussions with National Grid.

2.14.1 The proposed National Grid Substation is proposed to be located at the National Grid Substation Site (see Figure 1.2 Sheet 13 of 13). This section of the report describes the site characteristics of the National Grid Substation Site. Subject to on-going discussions with National Grid, an alternative location for the Substation, is potentially within part of sub-Site 1B (the characteristics of sub-Site 1B are described above) (shown on Figure 1.2). The potential for the National Grid Substation to be located at the National Grid Substation Site and part of sub-Site 1B are both addressed in this Scoping Report.

The applicant has not provided any details of size or visualization of the National Grid Substation as stated in the scoping document, therefore this should be rewritten to provide comprehensive details on this National Grid Substation, including essential visualizations to demonstrate its impact on Great Moulton Plateau, visual effects, and nearby residential areas in addition the impacts covered in NPS EN-1

“3.6.7-3.6.12 “The applicant has not addressed the potential of this in any detail, the scoping report has totally unmined the importance of this part of the scheme. There is no visualization of the components of the scheme therefore diluting the enormous impact this will have on the countryside. 34 Planning Inspectorate (2024) Nationally Significant Infrastructure Projects: Commitments Register. Available at: https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-commitments-register

“National Grid Substation and Grid Connection Infrastructure - Achieving good design. Achieving good design requires a holistic approach to deliver high quality, sustainable infrastructure that responds to place and takes account of often complex environments. Good design is not primarily about how infrastructure looks, although these considerations

(the aesthetics) are important. Nationally Significant Infrastructure Projects: Advice on Good Design - GOV.UK"

3.6.11 The details of the National Grid Substation and Grid Connection Infrastructure will be refined throughout the progression of the Scheme through PEIR and EP and ongoing engagement with National Grid Electricity Transmission plc.

3.6.12 The National Grid Substation will be constructed, operated and maintained by National Grid. This is in accordance with the Electricity Act 1989 that specifies that operators should develop and maintain an efficient, coordinated, and economical electricity transmission/distribution system, and includes required specifications.

"Applicants must provide comprehensive details on this National Grid Substation, including essential visualizations to demonstrate its impact on Great Moulton Plateau, visual effects, and nearby residential areas in addition the impacts covered in NPS EN-1

5.10.23 As detailed in Chapter 3 Scheme Description, all infrastructure will be removed upon end of life with the exception of the National Grid Substation, which will remain in situ. The underground cabling can be removed from the joint bays for recycling. However, the underground cabling ducting will be decommissioned in accordance with the latest regulations and good practice prevailing at that time and are anticipated to be left in-situ.

EP Extract

7.2.3 On this basis it is considered that there is limited potential for likely significant landscape or visual effects resulting from the Scheme to occur beyond 2km from each individual Site or sub-Site boundary (including the BESS), and the CRC. This judgement has been derived from professional experience of the nature of effects of solar farm developments. It takes into account the limited height of the solar panel and BESS elements, together with site characteristics, namely the generally flat topography within the landscape surrounding the Site. The presence of field boundary vegetation and woodland blocks within and adjacent to the individual Sites serve to provide screening and restrict visibility

EN-1 sets out assessment principles and generic impacts that an ES should address, and any specific considerations for applications. This includes a reference at paragraph 4.3.20 that the SoS should have regard to the ambitions, goals and targets set out in the Government's Environmental Improvement Plan 2023 for improving the natural environment and heritage. This includes having regard to the achievement of statutory targets set under the Environment Act 2021.

NPS EN-5 includes a section on 'Environmental and Biodiversity Net Gain' at Section 2.5, which states: "When planning and evaluating the proposed development's contribution to environmental and biodiversity net gain, it will be important – for both the applicant and the Secretary of State – to supplement the generic guidance set out in EN-1 (Section 4.6) with recognition that the linear nature of electricity networks infrastructure can allow for

excellent opportunities to: i. ii. reconnect important habitats via green corridors, biodiversity stepping zones, and reestablishment of appropriate hedgerows; and/or connect people to the ii. reconnect important habitats via green corridors, biodiversity stepping zones, and reestablishment of appropriate hedgerows; and/or connect people to the environment, for instance via footpaths and cycleways constructed in tandem with environmental enhancements" Section 2.9 of EN-5 concerns the relevant impacts which applicants must provide information on in addition to those impacts covered in NPS EN-1, being: Biodiversity and Geological Conservation; Landscape and Visual Impact; Undergrounding and subsea cables, Noise and Vibration, Electric and Magnetic Fields (EMFs) and Sulphur Hexafluoride.

An Approach to Landscape Character Assessment - GOV.UK
LUC_2001_RPA_E2_Great_Moulton_Plateau"

7.3 Overview of Legislation, Policy and Guidance

Planning Policy - National Planning Policy

7.3.1 The Overarching National Policy Statement (NPS) EN-1 202388 sets out the Government's policy for delivery of major energy infrastructure and is the primary basis for decision making relating to energy projects.

NPS EN-1 Landscape and Visual and, NPS EN-3 for Renewable Energy Infrastructure[89], and NPS EN-5 For Electricity Networks Infrastructure[90],

"This is being ignored and should be enforced - Visualisations may be required to demonstrate the effects of the BESS system and Substation/National Gride Infrastructure on the landscape of the Great Moulton Plateau.

[88] Department for Energy Security & Net Zero (2023), *Overarching National Policy Statement for Energy (EN-1).* Available at: overarching-nps-for-energy-en1.pdf https://www.landscapeinstitute.org/publication/tgn-02-21-assessing-landscape-value-outside-national-designations/Accessed Nov 24 set out the Government's policy for delivery of major energy infrastructure and is the primary basis for decision making relating to energy projects.

Measures will be incorporated within the LEMP to soften and screen views of the Scheme. There are no details of this and if that's the precise it should comply with footpaths and Bridleways as well as roads.

2.10.132: "Applicants should aim to minimise the use and height of security fencing. Where possible applicants should utilise existing features, such as hedges or landscaping. This is being ignored and should be enforced

The applicant should assess the impacts on, and loss of, all trees and woodlands within the project boundary and develop mitigation measures to minimise adverse impacts and any risk of net deforestation as a result of the scheme. Mitigation may include, but is not limited to, the use of buffers to enhance resilience, improvements to connectivity, and improved woodland management."

Extracts from the EP.

11.3.4 The Overarching National Policy Statement (NPS) for Energy (EN-1)184 recognises that noise and vibration from energy development can have impacts on the quality of human life as well as on wildlife in some cases.

11.3.6 The NPS for Electricity Networks Infrastructure (EN-5)186 sets out specific considerations which apply to electricity network infrastructure. NPS EN 5 notes the

potential for high voltage transmission lines in certain conditions, substation equipment such as transformers and other voltage regulation equipment to produce noise.

11.3.7 The Noise Policy Statement for England (NPSE)187 and National Planning Policy Framework (NPPF)188 include general planning guidance on noise and introduces the principles of adverse noise effects (which should be mitigated and reduced to a minimum) and significant adverse noise effects (which should be avoided). The NPPF also notes that tranquil areas which have remained relatively undisturbed by noise, and which are prized for their recreational and amenity value should be identified and protected.



Shotesham Parish Council

Response to Planning Inspectorate Letter dated 15 January 2025

Consultation on Environmental Impact Assessment (EIA) Scoping Report produced by East Pye Solar Limited ("the applicant")

PINS Reference: EN0110014



Views of the Proposed Site 8 in Shotesham, Norfolk

11 February 2025

Contents

1. Introduction..... 4
2. Background..... 4
3. Key Concerns..... 4
4. Landscape and Character of Shotesham..... 5
5. Review of Out of Scope Topics..... 5
6. Review of In Scope Topics..... 8

Appendix – Additional Comments

Jutification for the choice of this specific location for this scale of project 12
Proposed scope of the East Pye Solar EIA 14
Exploration of Reasonable Alternatives 15
Cumulative impact across all aspects of the EIS 16
Climate change adaptation 18
Major Accidents and Disasters 18
Air quality and associated risks to human health 19
Telecommunications, Television Reception and Utilities 20
Electric, Magnetic and Electromagnetic Fields 20
Glint and Glare 20
Glint and Glare impact specifically on airfields 21
Wind Microclimate 22
Impacts and cumulative impacts on remoteness and tranquility 22
All aspects of Cultural Heritage 23
All aspects of Human Health and cumulative impact on human health. 24
Rider and horse safety and enjoyment 25
Community, identity, culture, resilience and influence 25
Water quality or availability impacts to human health 26
Effectiveness of Environmental Mitigation 26
Contamination/damage to soil 27
Ground conditions 24
Environmental 24
Environmental impact to common species 25
Wintering/Passerine birds 25

Lighting 25
Impact of decommissioning on any Biodiversity Net Gain 26
Water and Flooding 27
Private water supplies and drinking water 27
Arboricultural 29
All socio-economic impacts..... 29
Employment and income 29
Economic impact to homeowners 30
Section specifically on BESS Site/Substration & Grid Connection Infrastructure 32

1. Introduction

This document sets out the response of Shotesham Parish Council to the Planning Inspectorate's consultation on the East Pye Environmental Impact Assessment scoping document. Many members of the village have contributed towards this response, and we have also worked closely with other local parishes.

The Parish Council is not opposed to solar farm proposals but believes that solar farms must be located in the right place with adequate mitigation and compensation for those affected. However, in some areas, for example in the area of Site 8, mitigation and compensation can never offset the harm that would be done.

2. Background

Shotesham is an ancient village lying in the valley of Shotesham Beck, a key tributary of the River Tas. Until the early 20th Century, this was largely a private village with farms and houses owned by the Shotesham Park Estate and tenanted. Shotesham Common, the area surrounding Shotesham Park and the surviving settlements of Shotesham All Saints and Shotesham St Mary's all form part of the Shotesham Conservation Area. Site 8 is situated in the upper reaches of the sloping valley of Shotesham Beck. Parts of Site 7 are also in the Parish, but these are part of the flatter upland plateau between the villages of Shotesham, Saxlingham Nethergate, Hempnall and Woodton.

The village, known for its unspoilt countryside and historic charm, risks losing its sense of remoteness and tranquillity. The project's sprawling layout could introduce an industrial backdrop that conflicts with the village's traditional aesthetic.

3. Key Concerns

We consider that the proposed scoping document attempts to minimise the impacts of this major proposal on the people, culture and landscape of Soth Norfolk and Shotesham, and seeks to minimise the analysis to be undertaken in support of the applicant's application for a Development Consent Order.

In particular, we believe the applicant has misunderstood the nature of the landscape of Shotesham and this is reflected in errors and omissions in the report, and through the proposed landscape receptors.

This is most significant in the area of Site 8; an area which we believe is completely inappropriate for energy production or storage.

The use of almost 5000 acres of scattered parcels of agricultural land to build a 2300-acre solar farm creates enormous upheaval and environmental impact and is likely to be highly inefficient in terms of the cost of electricity production, suggesting much more appropriate sites sit elsewhere. The Scoping Document provides little information to explain why the

proposed sites and cable corridors were selected, when so many other sites are closer to the proposed grid attachment point.

We are also concerned that this project may not be required to meet the Government's energy targets. There are many projects approved and in development which collectively go materially beyond the target levels of power production for our region.

In this response, we address the description of the landscape and character of Shotesham before reviewing those topics which the applicant proposes should be out of the scope of the EIA. Finally, we add comments on the areas of analysis that are considered in scope by East Pye.

Supplementary information, presented in a similar form to other parish councils is included as an appendix.

4. Landscape and Character of Shotesham

The Parish Council note with some alarm the errors and omissions in the description of Site 8 on pages 58 to 60. For example:

i. The site is erroneously described as "predominately flat" when Site 8B slopes down to the River Tas (Shotesham Beck) with a fall of around 11m, a significant incline in East Anglian terms.
ii. The dwellings south of Site 8B are also only c350m from Site 8A with views over the site.
iii. There is no reference to the properties on Wash Lane, only 300m from Site 8A and with views across the valley to the hillside of Site 8B.
iv. The Roadside Nature Reserves in the area are not listed under Ecology and Biodiversity.

As it stands, we consider that the work proposed in the scoping document will fail to recognise the substantial harm from the development of Site 8.

5. Review of Out of Scope Topics

The applicant proposes that a number of topics should be out of scope on grounds of materiality and insignificance. Given the size and complexity of this application (possibly the most complex yet seen in the UK) we find these proposals surprising. In the sections below, we have set out the Parish Council's view of why areas should be brought within scope.

5.1 Air Quality

The applicant has provided no strong justification for the exclusion of air quality from the EIA. We request that the impact of the construction, operation and decommissioning of

the scheme on human health and sensitive environmental receptors should be considered in scope, including potential impacts from large BESS fires.

5.2 Water Environment

The Parish Council is concerned about the potential for increased local flood risk and also the potential for increased pollution of watercourses, in an area where at least 13 households are understood to rely on boreholes for their water supply. The risks to human health from increased pollution of water courses, for those without access to mains supply, goes without saying.

In December 2020, the Tas valley saw major flooding problems including Shotesham Common and further downstream at Stoke Holy Cross. A solar farm a Site 8 can be expected to accelerate the runoff of water due to compaction of the ground and as water cascades off the solar panels. Market Lane in Shotesham has a seasonal ford at the meeting of sites 8A and 8B which can be impassable in a car or on cycle in the worst of weather; the proposed solar farm can only make this situation worse. We believe a full assessment of the impact of the solar farm on water quality and flood risk should be required as part of the EIA.

5.3 Major Accidents & Disasters

The scoping document does not appear to include a full analysis of all the potential risks and disasters that could affect the site over a lifetime of more than 60 years, including risks from heavy recurring rainfall (due to poor drainage on many sites and the potential for saturation of compacted soil), storm risk, and lightning strike. The wide geographic spread of the site makes it particularly sensitive to concerted attack by terrorists or enemies and the poor road access and geographic remoteness will hinder rapid response by the emergency services to any concerted attack. We consider that the EIA should include a full assessment of all major accident and disaster scenarios, and how these would be mitigated in practice.

5.4 Electric, Magnetic and Electromagnetic fields

We believe that a full assessment of EMP impacts on human and wildlife populations should be within scope. We believe it is critical to understand how the impact of EMF from 400kV cables where they cross roads and PROW must be included in the EIA.

5.5 Telecommunications, Television & Utilities

Given the large area covered by this development, including the cable corridors, it is inevitable that there will be significant conflict with exiting infrastructure and utilities. Most obviously, the major high-pressure gas pipeline that runs through Site 8 and other parts of the proposed solar farm. We propose that a full analysis of telecommunications, television reception and utilities should form part of the EIA.

5.6 Glint & Glare

We believe that a full analysis of glint and glare should form part of the EIA. Looking just at site 8, on a hillside, we believe that there is no reason to think that glint and glare can be adequately mitigated. We expect the East Pye proposals would lead to significant impacts on local residents and all those using the local network of roads and paths. Horses and horse riders may be amongst those worst affected. Light aircraft from local airfields frequently fly over our village, and the potential risks from the impact of glint and glare on pilots needs to be assessed s part of the EIA.

5.7 Lighting

We consider that lighting should be in scope for the EIA due to the significant impact on near neighbours and wildlife. Lighting can be expected to be a particular problem for Site 8 given the sloping nature of the proposed valley location. Most of the area covered is part of a Rural Dark Landscape. We also note that one of the proposed sites is less than 1km from the Seething Observatory, home of the Norwich Astronomical Society. The impact on this Society must be considered as part of the EIA.

5.8 Waste & Materials

Over the lifetime of the solar farm, a significant volume of waste materials will be produced. We believe that the ES should include an estimate, by type and quantity, of expected residues and emissions (such as water, air, soil and subsoil pollution, noise, vibration, light, heat, radiation), and the quantities and types of waste produced during the construction and operation phases, as required by the legislation.

5.9 Socioeconomics

The Scoping Report lists many of the adverse impacts of the solar farm on socio-economic factors. Positive benefits are limited to financial returns and short-term business benefits during the construction and decommissioning phases. It is far from clear that the loss of agricultural employment will be more than offset by new employment opportunities on these remotely managed solar farms. A full analysis of socio-economic factors is appropriate, in order to better understand the detrimental effects identified by the applicant and how these will be mitigated. Shotesham residents have already expressed concerns that the presence of industrial-scale infrastructure might deter investment and negatively impact local businesses, particularly those reliant on tourism and heritage appeal.

5.10 Human Health

While addressing climate change has the potential to improve health outcomes, the Parish Council is aware of the potential adverse impacts of large-scale solar farms on human health – particularly for those living near the sites. We can already see the

impact on the mental health on those residents who may be most affected by the East Pye proposals. We expect these effects to only worsen during the planning and construction phase of the project, and to be particularly severe for those seeking to sell a "blighted" property. We also believe that the impact on our quiet lanes and footpaths will see a reduction in beneficial recreational activity with adverse health impacts on the wider community. We also note that children exposed to solar farms are believed to be particularly susceptible to anaemia and behavioural issues. For these reasons, we believe that a full assessment of the proposed impact of the solar farm on human health is required.

5.11 Arboriculture

We believe that a full arboricultural survey of the proposed sites including the cable corridors is required in order to identify the key trees, the appropriate root protection zones and an appropriate plan for tree and canopy management. The vast scale of this proposal is not a reason to limit survey work to areas where trees or hedges are proposed to be removed.

5.12 Ground Conditions

We believe that there is likely to be significant impact on soil conditions from the creation of the solar farm and associated energy production and storage infrastructure and the eventual decommissioning of the site. These are likely to cause long term damage to soil quality, and we particularly highlight the risks from PFAS contamination.

6. Review of In Scope Topics

6.1 Landscape and Visual

The industrial appearance of extensive solar arrays, associated infrastructure (such as battery storage and grid substations), and long cabling routes would drastically alter the visual character of Shotesham's rural landscape.

We note that the proposed visual receptors are provisional and have not been agreed. We look forward to discussing these with the applicant. We note that several of the key viewpoints for Site 8, including some of those closest to housing, have been excluded. We were also surprised to note the small number of viewpoints proposed for the huge area covered by Site 7.

6.2 Ecology and Biodiversity

Shotesham lies in an area with unique biodiversity. The project poses risks such as habitat loss, disturbance to local wildlife (including species sensitive to changes like the endangered barbastelle bats), and cumulative impacts on the natural environment.

The Parish Council is pleased to note that all roadside nature reserves (RNRs) within 1km of the area are in scope for the ecological assessment.

We consider that the size of this application, including the cable routing corridors, is such that the cumulative effect on bird populations during all phases of development, operation and decommissioning could be material. We believe that breeding birds, wintering and passage birds should be fully in scope for the ES.

We agree that Dormouse can be considered out of scope but consider that all other mammals should be in scope. The scale of this proposal, the use of narrow country lanes for transport and the many water courses in or adjacent to the area, means that the cumulative impact of the proposal on mammal populations is difficult to determine without proper professional analysis. We request that consideration is given to the impact of the proposals on corridors for the movement of wildlife, particularly deer populations.

6.3 Cultural Heritage

Shotesham and its surroundings boast heritage assets and buildings that contribute to the village's identity. The proximity of the solar infrastructure could negatively affect the setting and appreciation of these historic features.
The village's longstanding cultural heritage, as part of an area noted for its historical significance, may be diminished by the loss of natural and built heritage, which is integral to community pride and local tourism.

We note the lack of clarity over the precise scope of the assessment of cultural heritage. We consider, as a minimum, that the impact should include all listed buildings within 500m of a site or the cable routing corridor (or with a direct line of site to a solar installation), and note that this would include Upgate Green Farm in Shotesham. We note that the high number of listed properties means that the proposal has the potential impact on the cultural heritage of this area even if the impact on individual properties is only moderate or minor. We believe the ES should include all potential impacts.

We note the rich archaeological heritage in the area and the proximity the area to the Romano-British town of Venta Icenorum and the roman road from this town to Colchester and London. Experience from other NSIP's suggests that desk research and geophysical surveys does not identify all significant areas of archaeology. We believe that the ES should include a well-designed programme of trial trenching across the proposed sites and the cable corridors.

6.4 Transport and Access

The Parish Council has significant concerns about the impact of additional traffic volumes on the area. While the scoping document suggests minimal impact on the bulk of the village, there seems likely to be significant disruption on the lanes heading due South (down Baxter's Lane) and on the major roads leading to and from Norwich (A140 and B1332).

We consider the following areas should be within scope:

i. The impact on the A140 due to the high utilisation of this road already and the impact of other significant infrastructure projects in the area including Norwich Tilbury, with particular reference to the impact of traffic tuning right into Fairstead Lane, Tasburgh (including the impact of the Long Stratton bypass which may reduce gaps in traffic flows).
ii. The capacity of C roads and unclassified roads to accommodate 2-way traffic.
iii. An assessment of the decommissioning traffic volumes, including any special mitigation measures required to avoid significant effects.
iv. Given the nature of some of the country roads proposed, a swept path analysis should be required for all HGV and AILs.

6.5 Noise and Vibration

The scoping document appears not to explicitly refer to the impact of vibration on nearby listed buildings. There are many and the individual and aggregate effects may be significant. The Parish Council considers that this should be in scope.

The decommissioning phase is proposed to be out of scope for noise and vibration. We believe it must be in scope as there simply insufficient information to determine the level of noise and vibration at present.

The applicant proposes to take many aspects of operational noise and vibration out of scope. We consider that all elements should be in scope except for underground cables.

We are particularly concerned about the risks to the high-pressure gas pipeline passing through Shotesham. We believe that the impact of vibrations from constriction activity and from traffic must be explicitly considered in the ES.

6.6 Climate Change

The Parish Council is concerned about the potential for climate change to lead to increased risks from extreme wind and precipitation, adding to the flood risk posed by this proposal. Extreme weather may also limit the ability of emergency services to

respond to any incidents. We believe that a Climate Change Risk Assessment from construction to decommissioning should be in scope.

We also note that East Pye proposes to limit the scope of the Greenhouse Gas Assessment. We consider that the GHG assessment must include the full lifetime of the scheme from offsite mining and construction activities through to eventual decommissioning.

6.7 Cumulative and In-Combination Effects

Paragraph 11.3.7 of the scoping document includes "*The NPPF also notes that tranquil areas which have remained relatively undisturbed by noise, and which are prized for their recreational and amenity value should be identified and protected*".

This description applies to large swathes of the sites being considered for this application (see the CPRE Tranquillity Map of England), but it is unclear how the applicant will assess the cumulative impact across the area. This item should be in scope.

There are many other facets of life in South Norfolk for which the cumulative impact of this scheme is likely to be significant, for example biodiversity, rural character, Public Rights of Way and the historic fabric of the countryside. A full assessment of the cumulative impact of East Pye with other energy schemes (production/storage/transmission) whether approved, in the pipeline or being consulted upon should form part of this EIS.

6.8 Reasonable Alternatives

Section 4.5 of the scoping document provides information on the assessment of reasonable alternatives. Given the enormous number of possible sites within 15km of the National Grid attachment point and the alternative options for the design and technical specification of the solar farm, the Parish Council consider that clearer expectations for this part of the ES should be established. We also suggest that an independent firm be appointed to conduct this assessment, rather than the applicant itself given the inevitable conflict of interest.

As a minimum the assessment of reasonable alternatives should include:

- site selection;
- alternative site layouts;
- underground cable route alternatives;
- substation siting alternatives;
- consideration of energy storage facilities and other supporting infrastructure;
- alternative solar technologies; and

- alternative environmental design.

Appendix – Additional Comments

Justification for the choice of this specific location for this scale of project should be scoped in

Although East Pye Solar quotes paragraph 4.1.5 of EN-1 which 'states that in considering any proposed development, and when weighing its adverse impacts against its benefits, the SoS should take into account:

"Its potential benefits including its contribution to meeting the need for energy infrastructure, job creation, reduction of geographical disparities, environmental enhancements, and any long-term or wider benefits.

Its potential adverse impacts, including on the environment, and including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce, mitigate or compensate for any adverse impacts, following the mitigation hierarchy".[1]

East Pye Solar have already openly admitted that local communities will gain no socioeconomic benefits whatsoever from this project, neither in terms of employment, skills nor even any energy from it.[2] They have also admitted, in a landscape with ancient woodland, endangered species and particularly barbastelle maternity roosts, that this project is likely to cause significant damage to our ecology including (quote):

- Habitat loss, disturbance or fragmentation (during construction and decommissioning);
- Disturbance, displacement, or mortality of wildlife (during construction, operation, and decommissioning);
- Disturbance, damage or loss of protected species breeding sites, hibernation sites or resting places (during construction, operation (panel replacement), and decommissioning);
- Noise and/or visual disturbance to species using the Sites (during construction, operation (panel replacement), and decommissioning);
- Impacts to designated sites or habitats through generation of dust or other pollutants (during construction, operation (panel replacement), and decommissioning); and

[1] 1.8.26

[2] East Pye Solar EIA Scoping document, 5.11.6, pg. 133-137. [17]
East Pye Solar EIA Scoping document, 8.8.7, pg. 208.

- Disturbance and pollution (indirect effects such as noise and vibration, dust, pollution, surface water run-off during construction, operation (panel replacement), and decommissioning)[17]

There are so many Listed Buildings surrounding this proposed scheme that the applicants have had to create an entire extra gazetteer to list them all: i**t is 67 pages long.** EPS state: 'It is considered that there is the potential for likely significant effects upon the historic environment resulting from the Scheme, based on the current proposals at the time of writing. These may include:

- Direct impacts upon archaeological features and deposits resulting in their partial/total loss as a result of construction; and

- Indirect impacts on the significance of designated heritage assets through changes to their settings, as a result of the presence of construction or decommissioning activities, or operation of the Scheme.'[3]

EPS quote EN-1 that 'public benefit must be weighed against any loss or harm to the significance of a designated heritage asset (Section 5.9.32 to 5.9.33). However, this project is of a scale in excess of requirements to the UK government's own 2030 and 2035 Net Zero targets; there is therefore no public benefit, either to the wider UK population or to the local community, as EPS have openly admitted.

From the outset, it is clear that this project is completely inappropriate for this location.

A justification for why there is any need for an NSIP solar project in this specific location, or indeed for the East Pye Solar project at all, should be scoped in. This should be addressed particularly in relation to other proposed NSIPs in Norfolk ahead of East Pye Solar in the inspection queue. RWE's High Grove solar NSIP (720MW) and Island Green's other proposed solar NSIP, The Droves (500MW), both in Norfolk, combined would generate 1.2GW of power, just by themselves exceeding the government's remaining 900MW goal for the entire 2035 solar requirements of the East of England.

Impact on the Broads National Park should be scoped in

Site 3a lies only 2 miles from the Broads National Park. Broads Authority's documents state that projects planned within 3 miles of their boundaries should consult with them.[4]

[3] *Ibid*, 9.6.2, pg. 232

[4] https://www.broads-authority.gov.uk/__data/assets/pdf_file/0025/184813/photovoltaics-1,-2-App-3-Part-2.pdf https://www.broads-authority.gov.uk/planning/planning-policies/landscape-sensitivity-studies

Proposed scope of the East Pye Solar EIA

The topics East Pye Solar propose to scope into the assessment are:

- Cultural Heritage
- Landscape & Visual
- Ecology & Biodiversity
- Transport & Access
- Noise
- Climate Change
- Soils and Agricultural Land

Areas East Pye Solar have requested to scope out the following categories:[5]

- Air Quality
- Water Environment
- Major Accidents and Disasters
- Electric, Magnetic and Electromagnetic Fields
- Telecommunications, Television Reception and Utilities
- Wind Microclimate
- Daylight, Sunlight and Overshadowing
- Glint and Glare
- Lighting
- Minerals
- Waste and Materials
- Socio-Economics
- Human Health
- Arboriculture; and
- Ground Conditions

It is notable that, contrary to what East Pye Solar claim, all these aspects pose significant impacts, which are either extremely challenging to mitigate or which question the viability of the entire project. We call for these areas to be scoped into the Environmental Impact Assessment, with our reasons outlined below.

East Pye Solar also propose to scope out subsections of categories that would be otherwise included in the Environmental Impact Statement. Again, this appears to be because they

[5] *Ibid,* 5.1.1, pg. 96

pose significant impacts that are impossible to mitigate, and they are therefore hoping not to address them publicly in detail.

Exploration of Reasonable Alternatives should be scoped in

East Pye solar quote paragraphs 2.10.19 – 2.10.48 of EN-3, which set out the following key considerations involved in the siting of a solar farm, in addition to considerations specific to individual projects:

- *'Irradiance and site topography*
- *Network connection*
- *Proximity of a site to dwellings*
- *Agricultural land classification and land type*
- *Accessibility*
- *Public rights of way*
- *Security and lighting'*

This project, by its own admission, would cause glint and glare to six airstrips to an extent that the Norfolk Gliding Club would cease to be able to operate; it is mainly located 15KM from its proposed network connection; it impacts hundreds of residences, the majority of which are Listed Buildings, and adjoins and even completely surrounds some individual homes and businesses; it is all sited on BMV agricultural land of grades 2, 3a and 3b; the narrow, single-track country lanes make it completely inaccessible for heavy goods vehicles without having to build new roads across agricultural land; it impacts around 30KM of public rights of way, either temporarily or permanently; it proposes floodlighting both during construction and operation in a dark skies area with no streetlighting with maternity roosts of barbastelle bats, a wide range of other protected bats, owls and other night-dwelling creatures.

In every aspect of the list they quote, this project fails to satisfy any of its own requirements. The magnitude of change and impact would be extremely high.

Due to this, these questions regarding reasonable alternatives should be scoped in:

- How have reasonable alternatives been considered?
- Present assessments of alternative location and sites. Date and reasoning for selection of this site.
- How have considerations been made of options with less damaging effects on the environment been carried out, to deliver the greatest environmental gains.
- Which brownfield sites, and sites not on BMV agricultural land have been considered?
- Provide a summary record on their decision-making on alternatives.
- Why do the panels need to be 4.5m and 3.5m high? This is an Irish-owned company and in Ireland the maximum panel height is 2m.
- Why is this plan the best it can be?

- Summary of cumulative effect of how this project benefits the landscape and community in terms of design and amenity.

Cumulative impact should be scoped in across all aspects of the EIS

There are already multiple solar projects either in operation, or consented for construction in South Norfolk, as well as another three with grid connections agreed in the same area.

Built:

- Tasburgh
- Trowse 1 and 2
- Bracon Ash solar and BESS

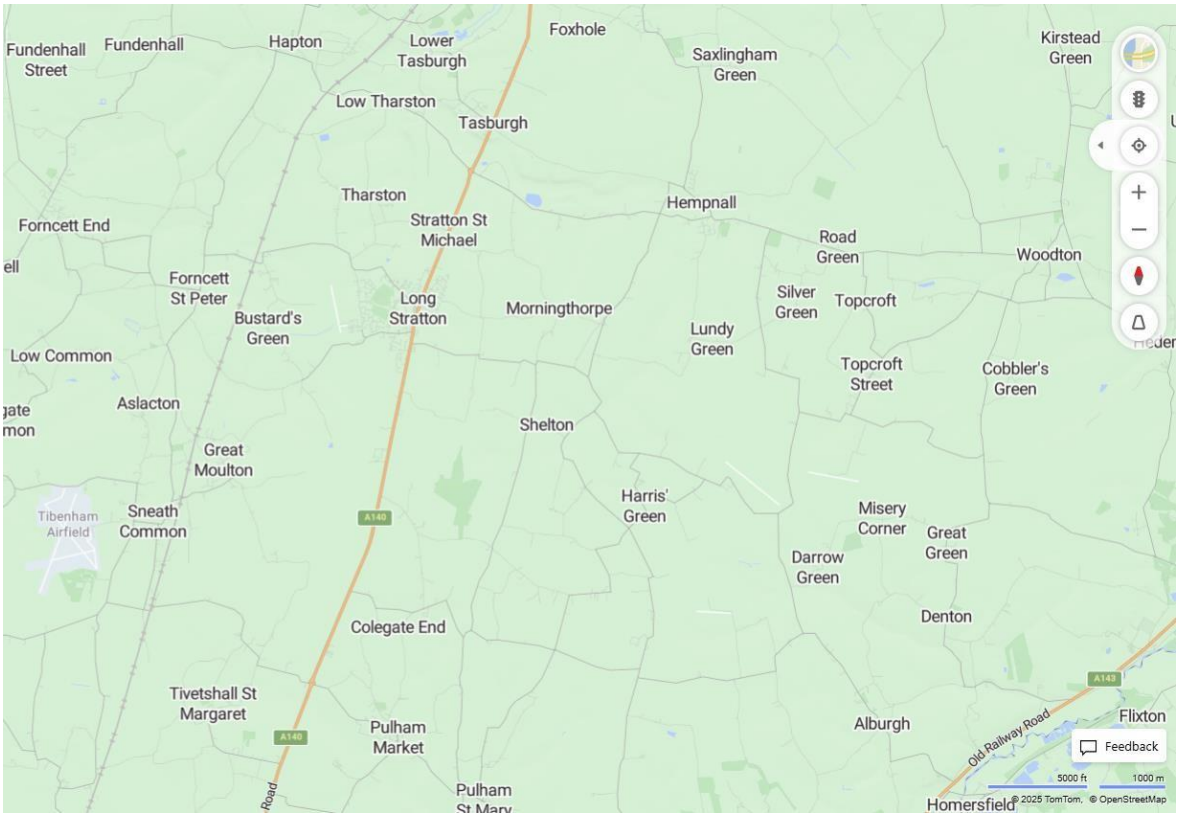
Consented:

- Bloys Grove 49.9MW

Scoping: These projects have not been added into the potential cumulative impact in EPS documentation

- Long Stratton 400KW + BESS (Location unknown, South and West of Long Stratton)
- Green Switch Capital, Wacton Road Energy Storage Facility (BESS), 228MW
- Noventum – Long Stratton 500KW + BESS (scoping immediately adjoining East Pye Solar scheme, north of Long Stratton and Hempnall, around Shotesham (EPS site 8)
- Gissing 900KW + BESS (location unknown, directly south of Easy Pye Solar scheme between Long Stratton and Diss)
- Maltings solar farm at Tivetshall (directly adjoining East Pye Solar BESS site to the west).

As listed above, East Pye Solar is one of FOUR NSIP projects with agreed grid connections for utility scale solar power plants just in the small area outlined on this map, between Gissing (lower left) and Long Stratton. These projects could remove around 17,000 acres of agricultural land from farming use. This quantity of solar infrastructure in this rural/agricultural area on the edge of the Broads National Park is inappropriate and completely excessive.



In addition to this, RWE are in pre-application stage for High Grove Solar Farm 700KW in South-West Norfolk. East Pye Solar's parent company Island Green already owns Trowse 1 and Trowse 2 solar plants, to the north of this proposed site. They are also developing plans for the Droves 500KW, another NSIP utility-scale site in South-West Norfolk.

Other infrastructure consented or planned for the area:

- Norwich to Tilbury Pylons
- Orsted BESS (south of A47)
- 1,800 houses plus associated infrastructure, new school, surgery, landscaping associated with the Long Stratton by-pass. Immediately to east of East Pye Solar Scheme.

These developments, particularly the excessive number of proposed NSIP solar farms are likely to have significant cumulative impacts on all aspects of the EIA, particularly ecology including common species, tourism, landscape and visual amenity, cultural heritage, transport (including PRoW), noise and vibration and particularly on human (mental) health, economic and wellbeing for all phases of the project. The cumulative impact of all these schemes should be scoped in from the start.

Climate change adaptation should be scoped in

As recently ruled in Scotland regarding the Rosebank and Jackdaw oil and gas fields, there should be a full impact assessment of the climate altering emissions and impacts to human health and human rights in the countries in which the panels and other equipment are manufactured, as well as the carbon footprint of the project, including global shipping and disposal of waste. Population health is not only our own populations but its impact on all populations involved in this project's creation.

For this reason, Waste and Materials should also be scoped in to demonstrate how and where damaged panels will be recycled, or all equipment will be recycled at the end of its lifespan. Chinese panels should not be used for this project if they contain PFAS and are unable to be recycles in the UK. It is particularly important to know how will unrecyclable materials such as PFAS (forever chemicals) be dealt with, and how all land will be decontaminated and returned either to its former agricultural grade or an improved grade once the project is decommissioned. Figures in the EIA to calculate waste production are currently incorrect by a factor of two.

Major Accidents and Disasters should be scoped in

Section 5.14 Human Health and **Section 5.4 Major Accidents and Disasters**. Absolutely should be scoped in. EPS admits 'In the unlikely event of a fire within the BESS, unplanned air emissions could result in the release of Hydrogen Fluoride (HF), which may impact nearby receptors depending on the location of the BESS in relation to sensitive receptors and the design of the BESS. However, this is unlikely to occur. A key design principle applied to the design is that BESS will not be located closer than 100m to sensitive human receptors (as described above) which will be secured through the DCO.'

The current proposed site for the BESS is upwind from a village. The Fire Service is not a statutory consultee on this project.

There have been a significant number of BESS fires now globally, with some in the UK taking as long as 59 hours to put out. How would such a fire be extinguished, given that BESS fires are currently left to burn out. The BESS should be sited significantly further away from habitation if the fire is to be left to burn.

Would fire suppressants be used? If so, which? The proposed BESS site is on a drinking water protection area and river catchment protection area, there is a significant risk of PFAS pollution of both drinking water, ground water and local rivers if there were to be a BESS fire. The environmental impacts of such a disaster to local residents and wildlife, as well as soils and rivers should be scoped in.

Air quality and associated risks to human health should be scoped in

'An assessment of air quality effects during operation is therefore scoped out of the ES.' Impact of potential damage to air quality from BESS fire should be scoped in, and associated risks to human health.

Other major impacts such as storm damage should be scoped in, especially in light of the Storm damage to the Solar farm on Anglesey.[6] How would contamination to soils and ground water from toxic materials in the solar panels be averted in the result of such a storm?

The impact on surrounding homes, listed buildings and ecology of any explosion from the unexploded ordnance on sites 3a and 3b should also be scoped in.

Telecommunications, Television Reception and Utilities should be scoped in, and also included within Major Accidents and Disasters

Several of the proposed sites for solar panels (5, 7E and 7F and 8) are on top of the highpressure gas pipeline that runs through Norfolk from Bacton, which is classed as a Major Hazard (MAHP). The proposed 400KV substation on site 5 and the welfare buildings for workers are also proposed to be built on it. The cable corridor would also potentially cross it. This is a significant risk not only to the PV farm but also to the surrounding area and public safety.

'PV farms carry an increased risk of a strike and lightning surge currents are of a magnitude and duration that could pass from any lightening protection or electrical the earth system to the pipeline.'[22]

'Pipeline operators are required to consider societal risk, the boundaries for calculating this, is often outside the wayleaves and easements and extend a considerable distance. […] increased population density and infrastructure on these zones could alter the area classification of the pipeline.'[7]

Limits are placed on 'vibration levels allowable near the pipelines – particular attention should be made to distances for piling…' [8]Any damage or potential damage to MAHP pipelines 'is likely to lead to serious safety, environmental and/or security of supply issues.'[9] The siting of a 400KW substation in close proximity to it, is also therefore of serious concern.

[6] Solar Farms and Wind Turbines Tested and Failed by Storm Darragh | TheCivilEngineer.org [22] UKOPA, 'Good Practice Guide: Managing developments and works in the proximity of high-pressure pipelines', January 2022, pg.

[7] Ibid. pg 8.

[8] Ibid. pg. 10.

[9] Ibid. pg. 10.

There are also pylons and overhead cables crossing several of the sites, that will require continued access to their easements. This may require additional access tracks or areas where development is not permitted. There are also impacts to siting solar infrastructure beneath overhead cables, such as lightning strikes, damage from falling cables or falling ice, earthing of metal fencing, rising of earth potential around base of pylons.

It is therefore essential that Utilities are scoped in and the whole section on Major Accidents and Disasters should be scoped in. It should also scoped into the related aspects of other sections, particularly human health, utilities, air quality and ecology.

Electric, Magnetic and Electromagnetic Fields should be scoped in

Assessments of electric, magnetic and electromagnetic fields should be scoped in, particularly in areas where overhead cables and pylons are proposed to be used, also in areas to be grazed by animals (eg. cable corridors). Animals are more susceptible to EMF radiation than humans and significant impacts to cattle from EMF have been reported.

There should also be a thorough evaluation of EMF effects on sensitive species such as bats. There is evidence that bat activity significantly reduces in habitats exposed to an EMF strength of greater than 2v/m. As we have very large bat populations, particularly of rare bats, Electric, Magnetic and Electromagnetic Fields should be scoped in.

Glint and Glare should be scoped in

EPS suggest that: 'No significant impacts from glint and glare are considered possible upon pedestrians/ users along PRoW. The reasoning is due to the sensitivity of the receptors (in terms of amenity and safety) being concluded to be of low significance. '[10]

This assumption is incorrect, as there is a significant safety impact to horse riders on bridleways. There is a significant safety hazard associated with reflections towards a horse and rider on a bridleway, especially if the bridleway is to be fenced on both sides, so preventing the rider from circling in the event that the horse bolts due to glare. This is also a significant glare impact to horse riders on public roads, and assessment of these impacts should also be scoped in.
'Solar reflections towards sections of the A140 and B1527 are within a road user's primary field-of-view and visible. Therefore, mitigation would be recommended for these sections of road.' There should be a detailed assessment of the impact of glint and glare in this location

[10] East Pye Solar EIA Scoping document, 5.7.23, pg. 123.

and proposed mitigation should be modelled to test whether it would actually be effective and whether there would be any interim impacts. If screening is proposed as mitigation, then an assessment should be made of how long it would take for this to prove effective, given the height of the infrastructure.

EPS states: 'The duration of solar reflections towards some residential dwellings occur for more than three months but less than 60 minutes on any given day. Therefore, mitigation would be recommended for these dwellings.' This is a significant impact and should be scoped in. Detailed plans should be submitted of the proposed mitigation for each affected residence. If screening by native hedges/tress is proposed, it would take a decade to grow tall enough to have any effect. Therefore, there needs to be a proper assessment of the interim impact of glint and glare on affected homes until any 'native species' screening is effective. There should also be an impact assessment of whether the solar arrays sited around houses would increase the heat of the air or soil at those properties, which could cause impacts to buildings and residents.

Glint and Glare impact specifically on airfields should be scoped in

Since East Pye Solar has chosen to situate its project in an area with six active airfields, it is imperative that glint and glare should be scoped into the Environmental Impact Assessment, particularly where this poses an existential threat to existing airfield operations. 'Solar reflections towards some aerodromes are greater than the acceptable limits of 'low potential for temporary after-image' and would therefore require consideration to the aerodrome's specific operations.'[11] The EPS document specifically says that Norfolk Gliding Club may be impacted by glint and glare, affecting their flying activities, and that this cannot be readily mitigated: 'Existing operation of the Norfolk Gliding Club may be affected as a result of glint and glare from the Photovoltaic panels affecting flying activities.' [12] Therefore, it is completely unacceptable to attempt to scope Glint and Glare out of the Environmental

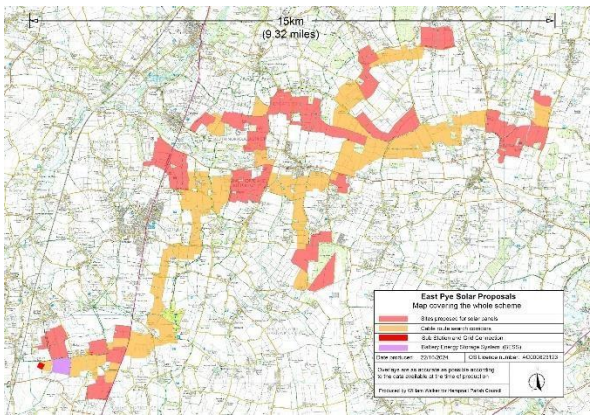
Impact Assessment. Especially as Norfolk Gliding Club state that the person sent to do the initial assessment has neither experience nor understand of the issues associated specifically with gliders. A full glint and glare assessment specifically relating to the six airfields impacted by this scheme should be scoped in, for the full range of different aircraft that use those facilities. No existing airfield should lose its function or ability to operate due to a new planning proposal.

[11] East Pye Solar EIA Scoping document, 5.7.24, pg. 123

[12] East Pye Solar EIA Scoping document, 5.11.6, pg. 135

Wind Microclimate should also be scoped in due to impact for airstrips and gliding club.

Impacts and cumulative impacts on remoteness and tranquility should be scoped in





Most of the countryside covered by these proposals is defined on the CPRE Tranquillity Map of England as "Most Tranquil." East Pye admit that this is an undeveloped area with a valued sense of remoteness and tranquillity. It has stayed historically intact and unspoilt because it avoided the effects of the Industrial Revolution. It is important that these few remaining untouched areas of rural England should be protected from development to preserve their integrity for future generations. The vast scale of this scheme and the distances it stretches across the landscape, some 15 KM would have a significant impact on the areas' '*valued sense of remoteness and tranquillity'*, and these aspects should be scoped into the Environmental Impact Assessment.

All aspects of Cultural Heritage should be scoped in

Ours is a rural landscape with wide-open spaces and expansive views. The scale, size and industrial appearance of the proposed East Pye Solar power plant would have a significant impact on the settings of conservation areas (several directly adjacent to the proposed sites) and the settings of multiple Listed Buildings of all grades. EPS state:

'Due to their prevalence in the area, Grade II Listed Buildings are reported up to 100m only.'







(l-r: directly opposite site 5b; directly opposite site 4b; directly adjacent to site 5b.)

The large number of Listed Buildings impacted by this proposed scheme is because this is an area of high historical significance. It is inadequate to only list the impact to Grade II Listed Buildings within 100m of the site, as due to the flat and expansive nature of the landscape and the height of the proposed infrastructure (4.5 or 3.5m high), it is very likely that it will significantly negatively impact the settings of multiple Grade II Listed buildings at a greater distance than 100m from the sites. Its impact on the area as a whole will damage the importance of this area as a largely untouched nationally significant collection of pre-1750s agricultural buildings. As these buildings are primarily farmsteads and rural churches, their appropriate protected settings are rural and agricultural, not industrial.

The range of assessment of Grade II Listed Buildings should be increased to at least 500m (the best-practice distance of any residence from solar infrastructure), if not further, with sightlines tested for those assets impacted at an even greater distance where there is any visual impact. It should also be noted that the distances measured should be from the edge of the curtilage of the Listed Building, not from the Listed Building itself.

There may also be other impacts to Listed Buildings in terms of vibration from construction, and impacts or vibration from traffic (particularly to Listed retaining walls or structures along narrow lanes). Timber-framed and clay lump buildings are particularly susceptible to damage from vibration, and this is the construction method of most of our pre-1750s farm buildings.

As it is proposed that native hedging/trees will be used for screening purposes, there will be at least a decade until such new plantings reach a height adequate to screen infrastructure that is either 4.5 or 3.5m high. The significant negative interim impacts to cultural heritage should also be scoped into the assessment.

Direct and indirect impact to cultural assets during the construction and decommissioning phases should be scoped in, as there are risks to timber-framed and clay lump buildings from vibrations and direct impact from large vehicles.

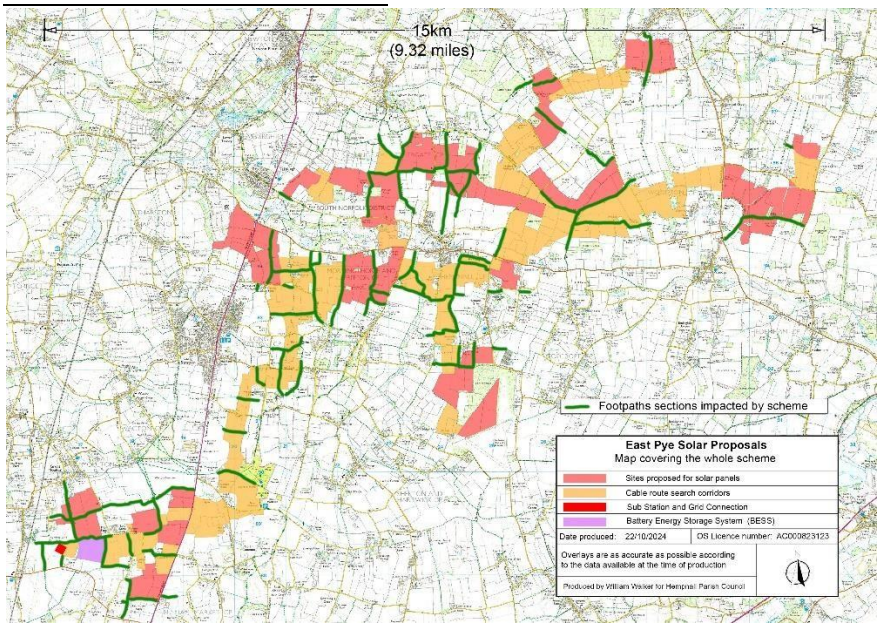
The cumulative impacts to cultural heritage of all the proposed developments listed above should also be scoped in. Some of these buildings, specifically the timber-framed farmhouse in the image above, are already being impacted by other projects, in this instance the Long Stratton Bypass.

Maps should be provided with all Listed Buildings marked and all other proposed infrastructure included, at whatever stage, so the true threat to cultural heritage can be estimated. Visualisations should also be provided of the proposed type of infrastructure, its distance and screening in relation to the Listed Building.

All aspects of Human Health should be scoped in. Cumulative impact on human health should also be scoped in.

This utility-scale power scheme is already having significant mental health and wellbeing impacts on the community. This is both in terms of the threat of the scale and extent of change, and permanent damage to residents' attachment to place and their visual amenity. The cumulative impact on human health, particularly mental wellbeing, of these four utilityscale solar power plants with connection agreements, potentially covering some 17,000 acres of our landscape in South Norfolk should be scoped in. Residents impacted by the scheme/s are already reporting significant feelings of anxiety, powerlessness and despair.[13]

Impacts to human health of a BESS fire and mental health should also be scoped in as EPS have chosen to site their battery site upwind from a small rural Domesday Book village with a population of less than 1000 and a large number of listed buildings. Community safety is also impacted by the siting of the BESS and should be scoped in.



[13] 'People Versus Power', *The Observer*, 29 December 2024. Solar farms v people power: the locals fighting for their county | Solar power | The Guardian

Public Rights of Way should be scoped in as a separate chapter

A significant number of Public Rights of Way will be impacted by this scheme. No one is going to walk along footpaths or bridleways between hundreds of acres of 4.5m high solar panels with 2.5m high fencing and security cameras.[14] It will also be unsafe to ride in these areas. This project will have a very significant impact on the ability of walkers and riders to be able to enjoy the countryside. The actual impact will be that we will lose these rights of way because they will be so visually unappealing covered in industrial infrastructure in our rural landscape that there will be no reason to continue to use them. As this project would impact so many of our PRoW, the impact of this loss of use on human health should be scoped in.

Rider and horse safety and enjoyment should be scoped in

A baseline for rider and horse safety and enjoyment of bridleways should be included. This is not mentioned at all in the project plan. Impacts on safety for riders and horses of specific equipment, glint and glare, layout, fencing, distances adjoining or running through bridleways. Baseline and impact modelling of specific situations including spooking, bolting, rearing in current situation compared to alongside or in the middle of solar equipment and infrastructure that will be installed on each specific site.

All foreseen impacts for riders and horses during construction and decommissioning both on roads and bridleways and mitigations proposed.

Community, identity, culture, resilience and influence should be scoped in

The scale of the proposed 300- to 700-person workforce is equal to or larger than the populations of some of the hamlets affected.

Community, identity, culture, resilience and influence – how the community perceives their surroundings – will be changed for the rest of their lives as this project has a span of 60 years, therefore this should be scoped in. The community feedback submitted to EPS so far is overwhelmingly against this project. There is no sense whatsoever that it will foster a 'sense of pride', as EPS optimistically state. So far the project proposal has created only community division, with individual farmers siting infrastructure directly around their neighbours' houses, causing mental anguish and putting families in negative equity. The project is so far only fostering a sense of communal devastation and mourning at the proposed destruction of our landscape.

[14] East Pye Solar EIA Scoping document, 5.12.9, pg. 140–3.

Other questions that need to be answered. How will these temporary workers get to work, move around or purchase food? Their car use has not been included in the traffic management plans. Where will the proposed portacabin shanty town be situated? There is currently inadequate public transport to reach these site locations, specifically for these quantities of workers. Seasonal agricultural workers already use the limited public transport, how will it sustain the addition of 300 to 700 additional workers in the area. Who will these people be, where will they come from? What safeguarding checks will be made about them before bringing them into our communities? Additional traffic on tiny country lanes, parking, sewage, refuse etc should be fully assessed. The EPS assessment of the populations of these tiny hamlets are inaccurate – they are in rural areas, away from the large villages they discuss.

Water quality or availability impacts to human health should be scoped in

The project is proposed to be located in an area of private water supplies, on areas protected for drinking water quality. All private drinking water supplies within 1KM of the site should be identified, and all impacts of the development to them scoped in.

EPS has already admitted that construction and decommission will cause run-off and silt. Toxic substances such as concrete, galvanised steel (zinc and lead) and aluminium are proposed to be pile-driven up to 4m into drinking water protection zones within close proximity to wells and boreholes. Contamination from microcracking caused by weathering and storm damage also poses the risk of toxic materials leaching from the panels themselves into ground water and aquifers. Solar panels are regularly coated with PFAS, which can leech into the ground water and aquifers. Underground plastic ducting and cabling also poses the risk of leeching PFAS and PFOS into ground water and aquifers. Fire-suppressant foams also pose a risk of contaminating drinking water supplies.

If water quality is damaged, homes and businesses will entirely lose their only potable water supplies. This is a significant risk to human health and should be scoped in.

Effectiveness of Environmental Mitigation should be scoped in

Mitigation proposals should be created for all endangered species recorded at all sites, both in desk-based and on-site surveys. Peer-reviewed evidence should be supplied that proposed mitigations are effective How will they address levels of uncertainty? How will they meet the costs of ongoing monitoring and data collection to check mitigation is effective? How will they address issues of ineffective mitigation? How will they Guarantee that measures proposed as mitigation to address the environmental impacts development are implemented as originally proposed? How will mitigation measures be enforced? How will funds be attached for this purpose to the project if the shell company dissolves?

Contamination/damage to soil should be scoped in

EPS state: 'The land within the Scheme will be restored and returned to its original use as far as reasonably practicable after decommissioning. This will include removal of the solar PV panels, substations, conversion units and BESS.'

As this is BMV agricultural land, it should be guaranteed that the land should be returned as agricultural land of the same or better quality at decommissioning. This is supposedly the reason these schemes and land use can be categories as 'agricultural' rather than industrial - that they improve soil quality and biodiversity, not permanently damage good agricultural land.

Compression, contamination estimates during construction and decommissioning for each site and specific equipment to be installed on that site should be provided.

Site/soil specific depth of compression at each site should be provided. Evidence from other sites with that specific type of equipment/soil.

Modelling of time for soil to recover from compression should be provided.

Modelling of long-term impacts to different grades of BMV soil should be provided.

Modelling and evidence of time for soil to recover homogeneity after decommissioning should be provided.

Length of time for soil to return to previous agricultural grade after decommissioning should be provided. Guarantee of return of soil to at least previous BMV grade should be provided.

Quantity, locations and contamination impact of cement/concrete on soil should be provided.

Risk assessment of developing site with historic PFAS contamination (eg. on and adjacent to the three former RAF airbases: Tibenham, Seething and Hardwick).

Liability for remediation of historic contaminated land disturbed by physical works during construction. Who will bear the liability and be responsible for remediation?

Materials of metal mountings, method and depth of installation, leeching/weathering impacts on soil should be provided for each specific site.

Leeching reports for all equipment/materials to be installed should be provided.

Contamination implications of weathering, microcracking and damage to panels on soil contamination should be provided.

Weathering and deterioration impacts of other equipment on soil should be provided.

Estimates of breakage of panels on transit and installation should be provided.

Breakage of panels due to weather events- storms, hail, debris falling on to panels, bird strikes should be addressed

PFOS/PFAS from underground cables. Long term impacts of leaving them in the soil should be addressed

Continuing soil monitoring should be undertaken and a plan and funding provided.

Impact of silt at each site should be assessed.

Modelling of soil contaminants from site, specifically lead and PFAS, on future crop growth on those sites, and also surrounding agricultural land should be assessed

Impact on the soil beneath the panels if the minimum height is 0.4m. Sheep will be unable to graze beneath panels, how will the soil therefore regenerate? There will not be improvements to soil quality on these areas.

'New internal access tracks are likely to be a maximum of 6m wide, constructed of hardcore or gravel over a levelling layer of substrate.' How do they propose to decontaminate this land and return it to agricultural use?

There is insufficient consideration for building new roads on sites capable of carrying and turning articulated lorries and storage of materials. Also, there is an unrealistic understanding of the potential for access from minor country roads without damaging verges. For example, Fairstead Lane (access to site 7) is too narrow to carry vehicles of the dimensions they specify.

Ground conditions should be scoped in

Given the highly likely existence of unexploded ordnance on both sites 3a and 3b (3b was the former heavy bomb dump for RAF Hardwick) and site 10, and the acknowledged contamination risks of all three former RAF airbase sites, ground conditions should be scoped in. It has recently come to light that there is significant PFAS contamination associated with the soils and ground water of former RAF bases,[15] with residents who have been using private water supplies associated with those sites requiring blood-letting to reduce the PFAS concentrations in their blood.[16] The PFAS contamination is associated with firefighting foams, which were used at airforce bases, including during WWII for firefighting.

Since the East Pye Solar Scheme adjoins three former RAF bases at Seething, Hardwick and Tibenham, it is important to fully assess the baseline levels of ground and water contamination from PFAS in these areas. It is also important to assess the likelihood of releasing any kind of historic contaminants into the soil by pile driving 4m below the plough line. The implications for underlying aquifers also need to be assessed.

[15] 'Forever chemical' hotspots revealed to include RAF bases and airports | The Independent

[16] Bloodletting recommended for Jersey residents after PFAS contamination | Jersey | The Guardian

There should also be an assessment of the impact of PFAS coatings and backings from the solar panels adding to this contamination. The long-term implications for these agricultural sites, surrounding areas and any future crop growth should be fully assessed.

Environmental

NPS EN-5 'Environmental and Biodiversity Net Gain' section 2.5 has not been followed. Biodiversity Net Gain (BNG) is an approach that aims to leave the natural environment in a better state than it was before. The BNG process requires developers to plan into their project increases in natural habitats and ecological features.

EN-1 This ES has not addressed assessment principles and generic impacts and should be rewritten.

Insufficient research has been carried out on biodiversity and the impacts of utility-scale solar.

Mitigation measures must be specific and aligned to identify all of the Environmental and biodiversity losses.

Environmental impact to common species should be scoped in

Due to the scale of this scheme across such a large expanse of the landscape, its impact on common wildlife should also be scoped in.



This is an area of ancient woodland with herds of red, roe and muntjac deer. It is a core woodland area and part of the UK Woodland Network for Biodiversity, which aims to allow the free migration of species across the landscape to enable genetic diversity. The impact of this extent of deer-fencing on the landscape and especially on deer and hares should be scoped in. Impact on common animals' ability to freely cross the landscape, mate and feed should be scoped in. With a project covering this extent of the landscape there is a significant concern that wildlife will be forced on to roads.

EPS states: 'Applicants should aim to minimise the use and height of security fencing. Where possible applicants should use existing features, such as hedges or landscaping.'[17] This is currently being ignored and should be enforced.

The impact of this scheme across the whole ecosystem should be properly quantified.

Wintering/Passerine birds should be scoped in

Several of the proposed land parcels are currently in the Countryside Stewardship Scheme for the protection of farm assemblage birds, specifically lapwing. There is no current effective mitigation for lapwing, which are a ground nesting species. The impact of this scheme to passerine birds should be scoped in, as it is likely to have significant effects on them.



Otters should be scoped in

The area is within three miles of the Broads Authority and has tributaries of the river Yare. It is therefore likely that otters may be present in the areas impacted by the scheme.

Lighting

Lighting should be scoped in as a separate topic because most of the countryside covered by these proposals is located in an area of Rural Dark Landscape as defined in Norfolk County Council's Environmental Lighting Zones Policy. Residents and visitors alike appreciate the local rural dark landscape and dark skies. The impact of any form of night-time artificial lighting on these treasured assets, ecology and residential amenity needs to be fully assessed.

[17] 2.10.132

Impacts of any lighting employed during the construction phase, on flora, fauna, dark skies, dark landscapes and residential amenity should be scoped in

'3.8.5 Temporary on-site lighting will be required during construction to enable safe working in hours of darkness'. The proposed working hours are between 7am and 6pm weekdays and Saturday mornings. In winter it is dark until 8am and after 4pm. There will be at least three hours of artificial lighting five days per week during the winter months. Many of the proposed sites are adjacent to woodland or locations with significant bat and owl populations. The impacts of temporary lighting of this scale on wildlife should be scoped in.

Impacts of any lighting employed during the 40 to 60 years operational period, on flora, fauna, dark skies, dark landscapes and residential amenity should be scoped in

'Motion sensing security lighting will be provided within the Substations, ancillary infrastructure and within the BESS for security and maintenance purposes, during hours of darkness.'

There is recorded barbastelle bat activity around the proposed BESS site. The impact of permanent motion-sensor lighting on the ability of creatures to rest, breed or feed should be scoped into the assessment.

Impact of decommissioning on any Biodiversity Net Gain should be scoped in

The impact of decommissioning and return to agriculture on any BNG gain during operation should be scoped in. Will any biodiversity net gain remain after decommissioning?

Water and Flooding should be scoped in

Private water supplies and drinking water should be scoped in

EPS must gather data on the number, types and locations of all private water supplies within 1KM of every proposed site or cable corridor.

EPS says at 5.3.7 'The Site and CRC are not located within any Drinking Water Protected Areas (surface water) or Drinking Water Safeguard Zones (both surface and groundwaters), with the exception of sub-Site 3A which is covered by a Drinking Water Safeguard Zone for surface water.' This is incorrect even by their own assessment which also identifies drinking water safeguard zones at site 1.

EPS identifies Impact pathways during the construction, operational and decommissioning phases to include the following:

- impacts on water quality from sediment/pollutant mobilisation, contamination from potential harmful materials (e.g. lead, lithium and other heavy metals) from solar panels/batteries during construction and decommissioning.
- impacts on local water supplies/groundwater from spills during construction and decommissioning; and
- impacts on water quantity/surface water runoff from increases in impermeable areas during operation

The EPS document says: 'potentially contaminated soils (if present) may be disturbed during the construction and decommissioning phases as a result of construction and decommissioning works, and during the operational phase as a result of in-ground maintenance works. Such disturbance could impact human health.' This will have an impact on private drinking water supplies, and also drinking water for farm animals and wildlife.

EPS say mountings are to be driven up to 4m into the ground – impact on aquifers should be scoped in.

Leeching impact of specific proposed equipment on ground water should be scoped in.

Damage, microcracking, leeching impact of equipment on drinking water quality.

Impact on drinking water protection zones of concrete, PFAS, galvanised metal and other toxins from panels.[18]

Impact of altered run-off and silt on specific nearby wells and boreholes, pumps and filtering equipment

Continuous monitoring of potential contamination of drinking water. This is a significant public health issue. Contamination of concrete and plastic-coated cables in perpetuity on

ground water, aquifers and drinking water supply. Particularly implications of PFAS solar panel backings and coatings - 'the asbestos of the future'[19] (International Society for Chemistry).

[18] rsc-policy-position-on-pfas-in-uk-drinking-water.pdf

[19] PFAS: The New Asbestos? - Environmental Law - United Kingdom Insurance Risks from PFAS - Per- and Polyfluoroalkyl Substances - Hannover Re

Flooding should be scoped in



‘5.3.21 In summary, the Site and CRC are considered to have a ‘Very Low’ to ‘Low’ flood risk from all sources.’ The flooding information provided is incorrect, as evidenced by the photograph of Long Stratton to the right. There were significant floods across the whole site in 2020 and 2023, during which times many of the major access routes EPS plan to use were impassible in multiple locations.[20] December 2024 Fairstead Lane was flooded and impassible.

Impact of run-off particularly on areas already prone to flooding should be scoped in. It should also be scoped in for areas on slopes, such as site 8 in Shotesham, and assessments of impact made during all part of the year due to varying ground conditions.

The Environment Agency advise for this project: ‘We recommend that solar panels and their infrastructure are not located within flood zones because there is potential for flood velocity and flood storage volumes to be affected by the panel support structures (legs and any associated bases) and any related infrastructure/buildings. Should flood velocity slow as a result of this, there is the possibility of flood water backing up and increasing flood risk elsewhere, especially upstream. Compensatory flood storage or hydraulic modelling can be required for solar farms within flood zones. There is also a risk of debris being caught up in the solar panel support structures or solar panels themselves as a result of flooding. The possibility of the solar panels becoming dislodged by flood water should also be investigated as they could pose a blockage risk downstream, especially to culverts.

In order to have fully considered all forms of flooding and their influence on the site, it will be necessary to identify the flood risk. It may be appropriate to undertake some flow analysis such at Flood Estimation Handbook and 1D modelling to establish the level. Any revised FRA for planning purposes will need to consider the source of flooding and demonstrate appropriate mitigation against fluvial flood risk.

We advise that modelling should be undertaken to accurately establish the risk to the proposed development in terms of potential depths and locations of flooding. The watercourse should be modelled in a range of return period events, including the 1 in 20, 1 in 100 and 1 in 1000 year events, both with and without the addition of climate change. The flood levels on the development site should be determined and compared to a topographic site survey to determine the flood depths and extents across the site.

[20] PICTURES: Firefighters called to numerous flooding incidents in and around Diss
Norfolk fire service declare flash floods a 'major incident' - BBC News
Major roads in Norfolk underwater after heavy downpours | Eastern Daily Press

We would recommend that FRAs at all levels should be undertaken under the supervision of an experienced flood risk management specialist (who would normally be expected to have achieved chartered status with a relevant professional body such as the Institution of Civil Engineers (ICE) or the Chartered Institution of Water and Environmental Management (CIWEM)).'[21]

Arboricultural should be scoped in

This is an area with a significant number of ancient hedgerows and trees of significance. They provide an important resource and habitat for wildlife. Unfortunately, we have already witnessed (photographic evidence) of landowners grubbing up ancient hedgerows last March during nesting season in advance of the environmental assessments for this project. We also have evidence of large numbers of hedgerows this winter being cut down to below a meter in height in advance of environmental surveys.

Due to the massive impact on the landscape of the cable corridors and associated infrastructure, there should be full surveys and impact assessments of all hedgerows and trees in all cable corridors and every site.

It is not acceptable to replace mature hedging and trees with new planting as mitigation.

Details of vegetation management plan including spraying and their impacts should be scoped in.

All socio-economic impacts should be scoped in

Section 5.11 East Pye Solar has explicitly stated that this project will bring no benefit to impacted residents, their communities or the people of Norfolk, either in terms of skills, employment, amenity nor even electricity. The only people benefitting are the handful of individual farmers involved in the scheme.

Employment and income should be scoped in

Impacts to tourism and businesses have been completely ignored.[22]

EPS have already been informed that there are businesses directly impacted by this scheme that would be unviable to open, either during the construction or decommissioning phases

[21] Email from Environment Agency 4 Feb, 2025.

[22] East Pye Solar EIA Scoping document, Table 5.8

as well as made potentially permanently unviable due to the siting of this project and its impact on tourism.

As we are only two miles from the Broads National Park and also close to the coast, we have a thriving tourist industry in South Norfolk, with many people coming to stay in holiday lets and Airbnbs for weekend breaks or summer holidays.

East Pye Solar have not provided any lists of local businesses impacted in their scoping report other than Norfolk Gliding Club. Loss of employment and income for those who own holiday lets, Airbnb properties, who run events, own farm shops or restaurants is a significant factor of this project and should be scoped in. East Pye Solar are familiar with impact statements from our residents, including this one published in the national press:

'Roy and Heidi Martin have spent the last three years converting their disused barn into two immaculate holiday lets overlooking fields that will be filled with panels. Roy believes their business will be completely unviable. "People come here for a quiet retreat. It's the last thing they are going to want," he says. "I've put everything into this – my life savings, two years of every penny I could earn, and what are we going to be left with?" he says.'[23]

Socio-economic impacts should also be assessed as a cumulative impact in light of the other proposed solar projects locally. The permanent impact to tourism businesses should also be assessed if all proposed solar projects in the area go ahead and the landscape is industrialised for the next 60 years.

Construction activities are likely to be carried out Monday to Friday 07:00-18:00 and between 08:00 and 13:30 on Saturdays, which means there will be a significant impact on restaurants, tourism and holiday lets, preventing some from being able to trade at all due to construction disturbance, noise and vibration.

Economic impact to homeowners should be scoped in

There should also be an assessment of the impact to homeowners' abilities to continue to insure their properties and any increase to insurance premiums as a result of being sited near to BESS infrastructure, substations or areas where there is likely to be any higher risk of flooding due to the scheme.

The site plan shows that the landowners and EPS have chosen to site infrastructure surrounding private homes, placed it immediately behind them, or directly in front of them.

---

[23] 'People Versus Power', *The Observer*, 29 December 2024. Solar farms v people power: the locals fighting for their county | Solar power | The Guardian

Local residents have been advised by estate agents that the most severely impacted homes have already lost 30% of their value from the time this project was announced. It is now not possible for homeowners to sell their homes until the project is either rejected or built and the true impact to their properties is known. Many families are threatened with being put into negative equity due to this scheme, as reported in *The Observer*:

'A local estate agent has suggested that the value of the worst-impacted houses could fall by 30%. If that happens, Chris and Jenna Humphrey will be in negative equity, their mortgage will be larger than their house's value. A 2023 peer-reviewed study found that UK house values dropped by an average of 10.2% if less than 750m south of installations greater than 10MW (properties to the south may be more affected because of panel glare), but they will be 50m away.' [24]

Others find themselves in financially ruinous situations having bought Listed Buildings from farmers involved in the scheme only to discover that they have placed solar fields directly beside them – making the properties now worth substantially less than it would cost to restore them.

Other landowners have chosen to site hundreds of acres of industrial solar infrastructure directly in front of holiday lets making them worthless and unviable as businesses. No compensation has been offered to any of these home or business owners. There has been no suggestion that other fields will be substituted to the scheme to avoid these severe impacts. This has had a significant impact on the mental health of the individual homeowners and that of the whole community, who witness this injustice.

The socio-economic impacts of this scheme must absolutely be scoped in. The cumulative socio-economic impacts of the other solar NSIP schemes that also have TEC grid connections agreed in the Long Stratton/Gissing area should also be scoped in as if all were to go ahead, it would have a major impact on property prices locally and tourism businesses. It is completely wrong that family finances and security should be jeopardised by a scheme that benefits only a foreign corporation and a handful of individual landowners.

Due to the proximity of homes and tourism businesses to all of the proposed sites, all aspects of noise and vibration suggested to be scoped out in the table below should be scoped into the EIA

[24] 'People Versus Power', *The Observer*, 29 December 2024. Solar farms v people power: the locals fighting for their county | Solar power | The Guardian

11.10 Summary

11.10.1 **Table 11.11** provides a summary of the noise and vibration scope.

Table 11.11: Summary of Scope for Noise and Vibration

Discipline	Scoped In Elements	Scoped Out Elements
Noise and Vibration	Construction traffic noise Construction noise Construction vibration Operational noise from BESS, substations, inverters and transformers Operational traffic noise	Construction, operational and decommissioning traffic vibration Operational vibration Operational noise and vibration from panels Operational noise and vibration from cable route corridor Decommissioning noise Decommissioning vibration

Section specifically on BESS Site/Substration & Grid Connection Infrastructure, Sites 1A, 1B, 2A, 2B, 2C

Extracts from the EP.

2 Site Description

BESS Site & Proposed Grid Infrastructure Site

3.7 Battery Energy Storage System

2.13.1 The potential siting of the BESS Site is adjacent to sub-Site 1B, separated by Hundred Lane. The BESS Site comprises an agricultural field bordered by lines of trees and hedgerows, and a small pocket of woodland along part of its western boundary. Great Moulton is located 1.1km north, and Sneath Common is located 1.1km west.

2.13.2 The BESS Site is a total of 22ha. The BESS Site will also accommodate 400kV Substation 1. However, the infrastructure associated with the BESS and 400kV Substation 1 is unlikely to utilise this entire space in order to allow for emergency vehicle access

3.7.1 A BESS provides an important balancing service, allowing electricity generated by the panels to be stored at times of low demand, and then exported onto the system when demand increases. The BESS will therefore enhance grid reliability and resilience. The BESS will have a capacity of up to 500MW.

3.7.2 The BESS will incorporate heating, ventilation and cooling systems to ensure the efficiency of the technology. These features are integrated into the units within which they are housed. The battery system will comprise DC/AC inverters to control the charge of the batteries from either the solar PV energy output or when drawing energy from the grid

3.16.1 The components of the Scheme are anticipated to have the following approximate lifespans: Photovoltaic Panels – 25-40 years; and Batteries – 15-20 years. 3.16.2 3.16.3 It is therefore assumed, that the solar panels could require replacement up to two times and the batteries up to four times during the operation of the Scheme. The environmental implications of the replacement of the solar PV panels and BESS will be considered within the assessment of operational impacts of the Scheme in the ES. The construction phase is therefore considered as a worst-case scenario for the panel and battery replacement scenario, with any impacts likely to be much less than those reported during construction.

NPS EN-5 'Environmental and Biodiversity Net Gain' Section 2.5, has not been followed.

EN-1 This ES has not addressed assessment principles and generic impacts and should be rewritten.

The following topics must be scoped back into the ES from evidence BEPS have seen. Water Environment; Glint and Glare; Waste and Materials; Socio-Economics; Human Health; Ground conditions.

2.14.1 The proposed National Grid Substation is proposed to be located at the National Grid Substation Site (see Figure 1.2 Sheet 13 of 13). This section of the report describes the site characteristics of the National Grid Substation Site. Subject to on-going discussions with National Grid, an alternative location for the Substation, is potentially within part of sub-Site 1B (the characteristics of sub-Site 1B are described above) (shown on Figure 1.2). The potential for the National Grid Substation to be located at the National Grid Substation Site and part of sub-Site 1B are both addressed in this Scoping Report.

The applicant has not provided any details of size or visualization of the National Grid Substation as stated in the scoping document, therefore this should be rewritten to provide comprehensive details on this National Grid Substation, including essential visualizations to demonstrate its impact on Great Moulton Plateau, visual effects, and nearby residential areas in addition the impacts covered in NPS EN-1, Biodiversity and Geological Conservation; Landscape and Visual Impact; Undergrounding and subsea cables"

Site 2 – Alternative Location for the National Grid Substation

EP extract

2.3.1 Site 1 is 56ha in size comprising two adjacent land parcels, sub-Site 1A and sub-Site 1B immediately to the east. Site 1 is located at the southern extent of the Scheme boundary, 170m south-west of Great Moulton, and immediately to the north of the BESS Site (see Figure 1.2 Sheet 2 of 13).

2.3.2 Sub-Site 1A comprises one agricultural field and sub-Site 1B encompasses four fields. Part of sub-Site 1B has the potential to accommodate the National Grid Substation. Whilst the National Grid Substation is likely to be located at the National Grid Substation Site as discussed at Section 2.14 of this Chapter, this is subject to on-going discussions with National Grid.

2.14.1 The proposed National Grid Substation is proposed to be located at the National Grid Substation Site (see Figure 1.2 Sheet 13 of 13). This section of the report describes the site characteristics of the National Grid Substation Site. Subject to on-going discussions with National Grid, an alternative location for the Substation, is potentially within part of sub-Site 1B (the characteristics of sub-Site 1B are described above) (shown on Figure 1.2). The potential for the National Grid Substation to be located at the National Grid Substation Site and part of sub-Site 1B are both addressed in this Scoping Report.

The applicant has not provided any details of size or visualization of the National Grid Substation as stated in the scoping document, therefore this should be rewritten to provide comprehensive details on this National Grid Substation, including essential visualizations to demonstrate its impact on Great Moulton Plateau, visual effects, and nearby residential areas in addition the impacts covered in NPS EN-1, Biodiversity and Geological Conservation; Landscape and Visual Impact; Undergrounding and subsea cables"

"3.6.7-3.6.12 "The applicant has not addressed the potential of this in any detail, the scoping report has totally unmined the importance of this part of the scheme. There is no visualization of the components of the scheme therefore diluting the enormous impact this will have on the countryside. 34 Planning Inspectorate (2024) Nationally Significant Infrastructure Projects: Commitments Register. Available at: https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-commitmentsregister

National Grid Substation Site (including Grid Connection Infrastructure)

EP extract

National Grid Substation and Grid Connection Infrastructure - Achieving good design

Achieving good design requires a holistic approach to deliver high quality, sustainable infrastructure that responds to place and takes account of often complex environments. Good design is not primarily about how infrastructure looks, although these considerations (the aesthetics) are important. Nationally Significant Infrastructure Projects: Advice on Good Design - GOV.UK

3.6.11 The details of the National Grid Substation and Grid Connection Infrastructure will be refined throughout the progression of the Scheme through PEIR and EP and ongoing engagement with National Grid Electricity Transmission plc.

3.6.12 The National Grid Substation will be constructed, operated and maintained by National Grid. This is in accordance with the Electricity Act 1989 that specifies that operators should develop and maintain an efficient, coordinated, and economical electricity transmission/distribution system, and includes required specifications.

“Applicants must provide comprehensive details on this National Grid Substation, including essential visualizations to demonstrate its impact on Great Moulton Plateau, visual effects, and nearby residential areas in addition the impacts covered in NPS EN-1, Biodiversity and Geological Conservation; Landscape and Visual Impact; Undergrounding and subsea cables”

*Noise and Vibration, Electric and Magnetic Fields (EMFs) and Sulphur Hexafluoride”*333101211 43 January 2025 “

5.10.23 As detailed in Chapter 3 Scheme Description, all infrastructure will be removed upon end of life with the exception of the National Grid Substation, which will remain in situ. The underground cabling can be removed from the joint bays for recycling. However, the underground cabling ducting will be decommissioned in accordance with the latest regulations and good practice prevailing at that time and are anticipated to be left in-situ.

The following should be scoped back in

EP Extract

7.2.3 On this basis it is considered that there is limited potential for likely significant landscape or visual effects resulting from the Scheme to occur beyond 2km from each individual Site or sub-Site boundary (including the BESS), and the CRC. This judgement has been derived from professional experience of the nature of effects of solar farm developments. It takes into account the limited height of the solar panel and BESS elements, together with site characteristics, namely the generally flat topography within the landscape surrounding the Site. The presence of field boundary vegetation and woodland blocks within and adjacent to the individual Sites serve to provide screening and restrict visibility

EN-1 sets out assessment principles and generic impacts that an ES should address, and any specific considerations for applications. This includes a reference at paragraph 4.3.20 that the SoS should have regard to the ambitions, goals and targets set out in the Government’s Environmental Improvement Plan 2023 for improving the natural environment and heritage. This includes having regard to the achievement of statutory targets set under the Environment Act 2021.

NPS EN-5 includes a section on ‘Environmental and Biodiversity Net Gain’ at Section 2.5, which states: “When planning and evaluating the proposed development’s contribution to environmental and biodiversity net gain, it will be important – for both the applicant and the Secretary of State – to supplement the generic guidance set out in EN-1 (Section 4.6) with recognition that the linear nature of electricity networks infrastructure can allow for excellent opportunities to: i. ii. reconnect important habitats via green corridors, biodiversity stepping zones, and reestablishment of appropriate hedgerows; and/or connect people to the ii. reconnect important habitats via green corridors, biodiversity stepping zones, and reestablishment of appropriate hedgerows; and/or connect people to the environment, for instance via footpaths and cycleways constructed in tandem with environmental enhancements” Section 2.9 of EN-5 concerns the relevant impacts which applicants must provide information on in addition to those impacts covered in NPS EN-1, being: Biodiversity and Geological Conservation; Landscape and Visual Impact; Undergrounding and subsea cables, Noise and Vibration, Electric and Magnetic Fields (EMFs) and Sulphur Hexafluoride.

An Approach to Landscape Character Assessment - GOV.UK
LUC_2001_RPA_E2_Great_Moulton_Plateau”

Decommissioning The National Grid Substation

7.3 Overview of Legislation, Policy and Guidance

88 Department for Energy Security & Net Zero (2023), *Overarching National Policy Statement for Energy (EN-1).* Available at: overarching-nps-for-energy-en1.pdf https://www.landscapeinstitute.org/publication/tgn-02-21-assessing-landscape-valueoutside-national-designations/Accessed Nov 24 set out the Government’s policy for delivery of major energy infrastructure and is the primary basis for decision making relating to energy projects.

The following paragraphs from NPS EN-1 Chapter 5.10 Landscape and Visual, as well as the landscapeinstitute.org/publication/tgn-02-21-assessing-landscape-value-outside-nationaldesignations, are pertinent to the scheme covering Great Moulton for the BESS and Grid Infrastructure installations.

EN-1 This EP has not addressed assessment principles and generic impacts and should be rewritten.

BESS health and safety considerations. It is our understanding that a large scale BESS fire would not be tackled by the local fire service, instead it would be allowed to “burn out”. This would require it being placed further away than 100m from any people and the recommendations as contained in Grid Scale Battery Energy Storage System planning – Guidance for FRS

The following should be scoped in

- recommendations as contained in Grid Scale Battery Energy Storage System planning – Guidance for FRS
- Emission modelling should take account of foreseeable scenarios, including thermal runaways in single and multiple containers.
- Means to retain and treat the large volume of water required to contain a thermal runaway should be secured in the DCO
- Degradation of water in the case of significant Incidents in the case of a Battery Fire.

Measures will be incorporated within the LEMP to soften and screen views of the Scheme. There are no details of this and if that's the precise it should comply with footpaths and Bridleways as well as roads.

2.10.132: “Applicants should aim to minimise the use and height of security fencing. Where possible applicants should utilise existing features, such as hedges or landscaping. This is being ignored and should be enforced

The applicant should assess the impacts on, and loss of, all trees and woodlands within the project boundary and develop mitigation measures to minimise adverse impacts and any risk of net deforestation as a result of the scheme. Mitigation may include, but is not limited to, the use of buffers to enhance resilience, improvements to connectivity, and improved woodland management.”

Visualisations may be required to demonstrate the effects of a solar farm on the setting of heritage assets and any nearby residential areas

Extracts from the EP.

11.3.4 The Overarching National Policy Statement (NPS) for Energy (EN-1)184 recognises that noise and vibration from energy development can have impacts on the quality of human life as well as on wildlife in some cases.

11.3.6 The NPS for Electricity Networks Infrastructure (EN-5)186 sets out specific considerations which apply to electricity network infrastructure. NPS EN 5 notes the potential for high voltage transmission lines in certain conditions, substation equipment such as transformers and other voltage regulation equipment to produce noise.

11.3.7 The Noise Policy Statement for England (NPSE)187 and National Planning Policy Framework (NPPF)188 include general planning guidance on noise and introduces the principles of adverse noise effects (which should be mitigated and reduced to a minimum) and significant adverse noise effects (which should be avoided). The NPPF also notes that tranquil areas which have remained relatively undisturbed by noise, and which are prized for their recreational and amenity value should be identified and protected.

South Norfolk Council
Horizon Centre
Broadland Business Park
NR7 OWF

The Planning Inspectorate
The Square,
Temple Square House,
Temple Quay
Bristol BS1 6PN

Date: 12 February 2025

Dear Sir/Madam.

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11

Application by East Pye Solar Limited (the applicant) for an Order granting Development Consent for the East Pye Solar (the proposed development)

Scoping Consultation

Thank you for your consultation dated 15 January 2025. We have reviewed the documents submitted and would like to make the following comments. The technical officer-level comments are made without prejudice basis and South Norfolk Council as host Local Authority reserves the right to make further comments during the Development Consent Order process.

South Norfolk Council considers in general that the Scope of the documents are sufficient to meet the requirements of the assessment of the project from our areas of expertise. However having regard to the documents submitted we would comment as follows, these comments follow on from our response to the applicant's non-statutory consultation:

Landscape and Visual

A full Landscape and Visual Impact Assessment should be undertaken, including where necessary a Townscape Assessment. This should consider all potential impacts, both during construction and in operation, and the cumulative impacts with other TCPA and NSIPs where appropriate.

Specific comments:

Arboriculture

- As existing trees and hedgerows are an undisputed feature of the sites and receiving landscape it is expected that tree surveys will be available to inform the scheme's detail design and be part of the submission for examination. From experience of previous NSIPs we do not consider that this can be left until final design as proposed in 5.13.3. Without detailed surveys of (at least) the potentially affects areas, it is difficult to fully weigh up the implications of the proposals.

- Furthermore, whilst the Scoping refers to the Hedgerows Regulations a few times, there is no specific reference to 'important' hedgerows and a presumption of their retention.

Consultation

- Just to confirm that, further to the situation described at 7.4.48, we have now provided notes on all the proposed viewpoint locations.

Ecology and Biodiversity

The EIA should consider ecological impacts associated with construction, operation (and maintenance) and decommissioning phases. Ecological surveys are currently being undertaken. The Council notes that the EIA will consider the ecological mitigation hierarchy, but it should also consider the biodiversity net gain hierarchy. A minimum of a 15 m buffer is requested around County Wildlife Sites as part of measures to avoid impacts on them.

Specific comments:

Ecological Surveys

- The Zone of Influence also needs to consider the Core Sustenance Zones for different bat species. Consideration should also be given to undertaking of surveys of trees within (I would suggest) 15 m of the site boundaries to consider impacts on roosts within proximity to the site which could be impacted. The Scoping Areas, and the scope of surveys, should be agreed with Natural England. Species surveys would be expected to be undertaken in line with best practice, and by suitably qualified and experienced ecologists. With regards to general biodiversity enhancements consideration should be given to veteranisation, and creation of natural roosting features in preference to installation of bat/bird boxes.

Great Crested Newts

- Re para 8.5.30 - Natural England have advised that there is a limitation on the availability of compensation ponds in Norfolk in 2025 with DLL being available for developments needing 1 or fewer compensation ponds. East Pye should therefore consider undertaking surveys to ensure that you have sufficient data to inform a mitigation licence application if DLL is unavailable.

Badgers

- Re para 8.5.40 - the Badger Trust updated the badger surveys guidelines in 2024 which should inform the assessment.

Ancient/veteran trees

- Re para 8.7.2 – consideration should also be given to the buffers around veteran/ancient trees, and consideration to vehicle tracking movement in their vicinity.

Ancient woodland

- Consideration should be given to the possible presence of ancient woodland where parcels are smaller than 2ha.

In combination impacts

- South Norfolk Council presently has a TCPA application for a solar farm 2024/3817 whose boundaries overlap with East Pye.

SuDS

- SuDS should be enhanced for the benefit of wildlife, with standing water provided.

Cultural Heritage

The EIA should include a Heritage Impact Assessment. The Council will also expect non-designated heritage assets to be identified that will likely be affected and whilst any assessment needs to be proportionate to their significance, the degree of impact should not be considered to be less simply because of the generally lower level of significance of non-designated heritage assets compared to designated heritage assets; the level of impact needs to be judged on how it may impact on the characteristics of each particular asset.

Specific comments:

- We are concerned at para 9.4.6 which states "As non-designated heritage assets can be identified during the planning process it is proposed to undertake consultation with South Norfolk Council to confirm whether they consider any historic features within or surrounding the Site to be non-designated heritage assets." The Council expects the applicant to identify/initially select sites of potential assets.

- With regard to some wording used in the Scoping, Page 224 of the statement states "Proposals which adversely affect the significance of a heritage asset will only exceptionally be permitted where clear and convincing justification is provided." Para 213 of the NPPF states "Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification". This is different phrasing, and The Council would suggest that reference is made to 'harm' as well as 'adversely affects'. Also, any harm should require clear and convincing justification. and should be weighed against public benefits.

- It is important to consider impact from permanent access roads (for example disrupting historic field patterns and access) as well as the fields where the equipment and solar panels will be located.

Environmental Protection Impacts

- In 5.2.11 the table indicates that PM2.5 will be compared against 20ug/m3 where The Environmental Targets (Fine Particulate Matter) (England) Regulations 2023 state the legal limit to be 10ug/m3 by 2040 with an interim target of 12ug/m3. The Council considers this should be corrected.

Consultation:

- Additionally, we note that in section 11.4.17 the report states that South Norfolk Council have not responded to the Noise Method Survey Statement. This is incorrect as we responded to the applicant on the 14th of November 2024.

Cumulative Impacts

South Norfolk Council are aware from the TEC register that there are a number of NSIP level projects as below:

Noventum – Long Stratton 460MW solar farm and BESS and connection to North Anglia Connection Node A 400kv
Elmya - Gissing by RPC (Renewable Power Capital) Elmya Carnation Devco ltd - 900MW solar farm and BESS with connection to North Anglia Connection Node A 400kv.
ENSO Green - Long Stratton– Solar Farm 400MW and connection into North Anglia Node A.

Whilst none of these are at pre-application stage at this point in time and it is appreciated therefore cannot be therefore be taken into account, given the need for energy delivery by 2030, it is considered that one or more will come forward during this projects Development Consent Order process. The Council would expect should

this occur that, given the location of these projects that the cumulative impact assessment will need to be carried out.

Equally the impacts of TCPA applications and pre-applications/scoping opinions should be considered, the details of which are available on the Council's website and can also be provided by the Council.

Social Economics

South Norfolk l considers that this topic should be scoped in. The effects and disruption for local business should be fully assessed for Construction and Operation, as well as the significant cumulative effects This is considered relevant given the proximity of the known NSIP Norwich To Tilbury Consultation. We also consider the EIA will need to consider appropriate mitigation and compensation to these groups given the large scale of the development proposed and longevity of the project. Equally, South Norfolk with its Market Towns of Diss, Harleston, Loddon and Wymondham; numerous Heritage assets including Saxon and Norman Churches; the Waveney Valley; Boudicca Way; museums; walking and cycling routes; associated accommodation; and venues for example, provides a rich tourism/visitor offer. The Council considers a full assessment of the impacts of the project would have on known features, directly and indirectly should be provided.

Agricultural Land

South Norfolk is a largely rural District and of which a significant part of which is farmland and is considered an important part of our local economy and also for food production. The potential loss of high-quality (Best and Most Versatile land) agricultural land has not been addressed/quantified and therefore the Council considers this should be scoped into the EIA. Equally the effects on farm business and rural economy should be scoped in for the construction and operation and the significant cumulative effects of known NSIP (i.e Norwich to Tilbury) and TCPA schemes.

Impact on Airstrips

The proposed sites are located close to a number of airstrips and therefore it is considered that the impact on whether the Glint and Glare could compromise aircraft safety and also their operation should be considered in the EIA.

Health/Fire risk

The Council has concerns regarding combustible equipment, particularly the BESS and considers potential impact should be addressed as part of the EIA.

South Norfolk Council wishes to continue to engage with the developer to seek to minimize the impact of the development on its communities and environment in a constructive and respectful manner and welcome the developer's comments that there will be continued consultation through the process.

Yours faithfully

Claire Curtis

Mrs Claire Curtis
Area Planning Manager and Nationally Significant Infrastructure Projects (NSIPs) Lead Officer
t 01508 533788 e [redacted]@southnorfolkandbroadland.gov.uk
South Norfolk Council

Suffolk County Council

Working Together



East Pye Solar

EIA Scoping

Comments of Suffolk County Council and Mid Suffolk District Council

Contents

Introduction 2
SCC Energy and Climate Adaptive Infrastructure Policy 3
Key Issues 4
Cumulative Effects 4
Economic Development, Tourism and Skills 4
Highways 5
Detailed Technical Comments 5
Economic Development, Tourism and Skills 5
Highways 9
SCC Planning Authority 10

Introduction

1.1 This is a joint response from Suffolk County Council (SCC) and Mid Suffolk District Council (MSDC), referred to as "the Councils", to the Environmental Impact Assessment (EIA) Scoping consultation held between 15 January and 12 February 2025 by the Planning Inspectorate in respect of East Pye Solar Limited's East Pye Solar Scoping Report.

1.2 The Scheme would allow for the generation and export of over 50 megawatts (MW) Alternating Current (AC) of renewable energy, and is therefore considered a Nationally Significant Infrastructure Project (NSIP).

1.3 The proposed development comprises the construction, operation, maintenance and decommissioning of ground-mounted solar PV arrays and associated development, including conversion units, a battery energy storage system (BESS), several 33kV and 132kV substations, two 400kV substations, grid connection infrastructure (including the new National Grid substation), underground cables between the solar array sites and the BESS site and National Grid substation site, ancillary infrastructure, access tracks, green infrastructure, fencing and security, mitigation and enhancement areas, and temporary construction compounds.

1.4 The proposed development will connect to a new National Grid substation compound which is expected to be built at the Point of Connection, within the south-west of the site.

1.5 The whole site, comprising ten individual sites, is located within the administrative boundaries of Norfolk County Council and South Norfolk Council, covering approximately 2,215 hectares of land in total.

1.6 A map of the current order limits of the proposed development, showing the local context, is provided in Appendix A.

1.7 This response contains the comments of the Councils specifically on the question of the adoption of an EIA Scoping Opinion by the Planning Inspectorate and is not intended to make comments on the merits of the project itself. The response includes an introductory section, including SCC's Energy and Climate Adaptive Infrastructure Policy, followed by some general comments on East Pye Solar Limited's approach to scoping for its East Pye Solar project, then identifies key issues in overview, followed by specific detailed topic-based comments.

1.8 The SCC electoral divisions directly affected are as follows:

- Bungay
- Hartismere
- Hoxne & Eye

SCC Energy and Climate Adaptive Infrastructure Policy

1.9 SCC adopted its Energy and Climate Adaptive Infrastructure Policy in May 2023, setting out its overall stance on projects required to deliver the UK's Net Zero ambitions. The policy is relevant for the Councils' position on the East Pye Solar proposals, and states:

1.10 "Suffolk County Council has declared a Climate Emergency and is therefore predisposed to supporting projects that are necessary to deliver Net-Zero carbon and climate adaptation for the UK. However, projects will not be supported unless the harms of the project alone, as well as cumulatively and in combination with other projects, are adequately recognised, assessed, appropriately mitigated, and, if necessary, compensated for."[1]

1.11 The Councils will follow this approach in this response, and throughout the subsequent DCO process.

1.12 The Councils consider it essential that effective Planning Performance Agreements (PPAs) are agreed with the promoter. Its Energy and Climate Adaptive Infrastructure Policy states:

1.13 "The Council will expect developers to engage in effective pre-application discussion with the Council. The Council expects that the costs of its engagement throughout the consenting process will be covered under the terms of a Planning Performance Agreement. This will be on a full cost recovery basis, to ensure that local services, and local taxpayers, are not disadvantaged financially by the Council's engagement with project promoters."

1.14 Further details on the position SCC adopts in relation to PPAs can be found in its published guidance for project promoters.[2]

[1] See SCC Energy and Climate Adaptive Infrastructure Policy: https://www.suffolk.gov.uk/asset-library/energy-and-climate-adaptive-infrastructure-policy.pdf

[2] See Suffolk County Council's expectations for Planning Performance Agreements (PPAs) for Nationally Significant Infrastructure Projects (NSIPs) – Guidance for project promoters:

1.15 The Councils continue to be willing to work with East Pye Solar Limited through the issues, towards improvement of the proposals and required mitigations, and looks forward to further engagement over the coming months.

1.16 SCC has also published a Supplementary Guidance Document[3] for its Energy and Climate Adaptive Infrastructure Policy which gives specific guidance for developers of solar farms, following SCC's experience with such NSIPs, which the promoter is encouraged to consult. The document contains guidance on the roles of the developer and authorities, how they should interact and how SCC expects solar-specific issues to be handled by the promoter.

Key Issues

2.1 This section sets out extracts that highlight some of the key issues that arise out of the scoping consultation. This section must be read in conjunction with the remainder of this document which provides the full response from internal consultees.

Cumulative Effects

2.2 The Councils are conscious that a significant number of renewable energy and other large scale infrastructure projects are under construction or being proposed in Suffolk, or in nearby areas, resulting in impacts on Suffolk. This includes those within the general vicinity of the location of the proposed East Pye Solar project.

2.3 The Councils are aware of several other projects in the area which may surface during the determination of this application and create effects that combine or interact with the East Pye Solar proposals. The Councils consider it essential that the promoter's assessment of cumulative impacts includes all reasonably foreseeable projects, as per the Norfolk Vanguard judgement.

2.4 A map of both consented and proposed NSIPs affecting Suffolk is provided in Appendix B.

2.5 The Councils note that the promoter proposes to address cumulative effects in a separate chapter within the Environmental Statement (ES).

Economic Development, Tourism and Skills

2.6 The Applicant is expected to use and follow SCC's Energy and Climate Adaptive Infrastructure Policy Socio-Economic Supplementary Guidance (Appendix C) to develop an appropriate and robust socio-economic impact assessment.

2.7 The Councils consider the methodology insufficient. The methodology should incorporate phase-specific workforce data and scenario-based analysis to determine local employment effects across the construction, operation, and decommissioning phases.

---

https://www.suffolk.gov.uk/asset-library/planning-performance-agreements-for-nationally-significant-infrastructure-projects.pdf

[3] Energy and Climate Adaptive Infrastructure Policy Large scale solar schemes Supplementary Guidance Document: https://www.suffolk.gov.uk/asset-library/scc-policy-large-scale-solar-booklet.pdf

2.8 The Councils strongly disagree with and refute the Applicant's approach to scope identified socio-economic impacts out of the ES, and request that a robust and transparent assessment is conducted using the recommended methodology in Appendix C.

2.9 The Councils consider more work is required by the Applicant to define the spatial and temporal scope of the assessment. Insufficient justification is provided for the defined boundaries of the socio-economic impact zones, and the Councils expect a localised and tiered definition of supply chain zones. The Councils also expect further granularity of the temporal scope impact categories.

2.10 A socio-economic baseline has not been conducted by the Applicant, resulting in the absence of any socio-economic data to assess and inform effective impact mitigation. The Councils consider that the Applicant must conduct a baseline assessment to better understand the development area.

2.11 The Councils expect the Applicant to conduct further analysis of cumulative impacts, including proactively assessing workforce displacement and competition, supply chain overlap, and housing and accommodation effects. The Regional Skills Co-ordination Function at Suffolk County Council can provide support for NSIP collaboration and identifying regional skills shortages.

2.12 The scoping out of socio-economic impacts has resulted in a failure to propose sufficient mitigation measures and opportunities to address evidenced positive and negative workforce and supply chain effects.

Highways

2.13 The Councils are concerned about the cumulative impacts of a number of NSIPs adjacent to the A140 being delivered concurrently.

2.14 The Councils would expect the promoter to provide programmes and estimates of construction vehicles to allow informed comments to be provided on the scoping of documents, including the Transport Assessment.

2.15 The Councils are aware of weight restrictions on bridges north of the site which may require large loads to be routed via the A140 to the south.

2.16 The Councils expect the promoter to proactively undertake robust investigations into proposed abnormal indivisible load (AIL) routes in order to identify any weight restrictions and, where necessary, identify appropriate measures to resolve these issues.

Detailed Technical Comments

Economic Development, Tourism and Skills

2.17 SCC and MSDC are joint lead authorities on Economic Development, Tourism and Skills matters.

Introduction

2.18 The Councils have reviewed the East Pye Solar Environmental Impact Assessment (EIA) Scoping Report and provide the following comments with respect to skills, supply chain, tourism and broader socio-economic impacts. This response applies SCC's Energy and Climate Adaptive Infrastructure

Policy Supplementary Guidance (Appendix C), which establishes a framework for appropriately assessing the socio-economic impacts and making evidenced judgements against areas set out in NPS EN-1(5.13.4). The Applicant is expected (with the support of the local authorities and Suffolk County Council) to use and follow the supplementary guidance to develop an appropriate and robust socio-economic impact assessment.

2.19 The Councils' recommendations are intended to strengthen East Pye's socio-economic assessment by introducing phase-specific workforce and supply chain insights, applying evidence-led probability scenarios, and addressing indirect and cumulative impacts. The Councils expect the assessment to be structured around the following core elements:

- Detailed Baseline and Existing Socio-Economic Environment
- Strategy and Policy Review
- Comprehensive Supply Chain Assessment
- Education and Training Infrastructure

Methodology of Assessment

2.20 The Applicant's proposed methodology outlines a generic significance matrix, categorising effects based on impact magnitude and receptor sensitivity. While this is standard practice, the Councils consider the methodology insufficient for accurately assessing the socio-economic impact and making evidence judgements about the project, including any cumulative effects such as workforce and supply chain effects.

2.21 Following the supplementary guidance in Appendix C, the methodology should incorporate phase-specific workforce data and scenario-based analysis to determine local employment effects across the construction, operation, and decommissioning phases. The Councils recommends:

- Assessing workforce inputs by phase, skill level, and duration
- Applying probability-based economic modelling to estimate local employment and supply chain participation
- Differentiating between high-skilled and low-skilled roles, recognising their varying commuting patterns

2.22 The Councils note that all the identified socio-economic impacts have been scoped out of the ES based on the limited list of socio-economic receptors and justifications, in favour of a standalone Socio-Economic Statement that will only report on the socio-economic benefits of the scheme. The Councils strongly disagree with and refute this approach and expect socio-economic effects to remain within the ES and request a robust and transparent assessment is conducted using the recommended methodology within the supplementary guidance to accurately assess impacts and make evidence-led judgements about NPS EN-1 (5.13.4).

2.23 The findings of any socio-economic assessment conducted by the Applicant also inform transport modelling, accommodation and housing, and provision of local services, including but not limited to, health and public protection. Therefore, the Applicant and the County Council must agree to the detailed assessment methodology prior to this work being undertaken.

Subsequently, the County Council and Applicant will need to agree that the outputs are acceptable and robust, such that they can inform both the socio-economic modelling and importantly the potential impacts on transport modelling, accommodation, housing, and local services.

Spatial and Temporal Scope of Assessment

2.24 The East Pye scoping report defines local, regional, and national socio-economic impact zones within Table 4.5 Generic Effect Definitions but lacks sufficient justification for these boundaries and due consideration for the socio-economic impact. The Councils expect East Pye to provide a defined workforce geography from which the labour will be drawn from for each phase of the project, considering:

- Propensity for travel and accessibility to site
- Public transport availability and commuting patterns
- Alignment with Traffic and Transport methodology

2.25 The Councils also expect East Pye to define supply chain geographies that considers regional impact. The Councils expect a localised and tiered definition of supply chain zones, such as:

- Hyper Local Supply Chain Area– Broadland District and South Norfolk
- Local Supply Chain Area - Norfolk County Council
- Regional Supply Chain Area – East of England

2.26 The Applicant categorises temporal scope impacts as short-term (up to 1 year), medium-term (1-5 years), and long-term (5+ years). However, the Councils request further granularity and evidence to inform temporal impact, distinguishing and identifying:

- Construction workforce peaks and troughs
- Operational workforce stabilisation
- Supply chain opportunities and the associated legacy effects

Baseline Information Requirements

2.27 A socio-economic baseline has not been conducted by the Applicant therefore the subsequent receptors and potential effects table includes no due socio-economic consideration of the area in which the project is set to be constructed and operational, meaning there is a noticeable absence of socio-economic data necessary to assess and inform effective impact mitigation. Once the appropriate methodology and boundaries have been provided, the Councils expect East Pye to:

- Identify existing workforce demographics and skills gaps
- Analyse the capacity of the local supply chain to engage with the project
- Assess local training and education infrastructure alignment

2.28 The baseline assessment can be supported by the local authority and the Regional Skills Coordination Function led by Suffolk County Council.

2.29 The Councils expect the baseline assessment to integrate regional economic indicators, employment trends, and education capacity, ensuring a robust evidence base for workforce and supply chain planning.

Adverse Interactions with Other Projects

2.30 The scoping document briefly acknowledges cumulative effects but defers detailed consideration. The Councils expect East Pye to proactively assess workforce competition and supply chain displacement by:

- Collaborating with other NSIP promoters to coordinate workforce demand
- Quantifying cumulative accommodation and transport pressures
- Identifying regional skills shortages that may be exacerbated

2.31 In addition to the local authorities, the Regional Skills Co-ordination Function at Suffolk County Council can provide support for NSIP collaboration and identifying regional skills shortages.

2.32 The Councils note that throughout construction and at peak, an influx of construction phase workers could strain local housing availability. The Applicant estimates the peak workforce during construction to be between 300-700. East Pye assumes temporary accommodation solutions will mitigate these effects, but the Councils recommend further consideration of:

- Indirect pressure on rental and housing markets
- Potential inflationary effects on temporary housing costs
- Displacement risks for local residents and businesses

2.33 The Councils recommend that housing and accommodation effects remain within the scope of the ES, rather than being dismissed prematurely. Using the supplementary guidance, more accurate assessments of workforce impacts and their respective impacts upon housing can be determined, as outlined in methodology section of this response.

Mitigation Measures and Enhancement Opportunities

2.34 East Pye's generic socio-economic assessment seeks to scope out the limited socio-economic receptors it identified and therefore fails to propose sufficient mitigation measures and opportunities to address evidenced positive and negative workforce and supply chain effects. The Councils expect the project to:

2.35 Follow Suffolk County Council's Energy and Climate Adaptive Infrastructure Policy Supplementary Guidance to develop an appropriate socio-economic assessment to make evidence informed judgements against areas set out in NPS EN-1 (5.13.4)

2.36 Develop an Employment and Skills Strategy in collaboration with SCC's Regional Skills Coordination Function.

2.37 Establish local supply chain engagement mechanisms, ensuring regional SMEs have visibility and access to procurement opportunities.

Summary

2.38 The Councils disagree with the decision to scope out socio-economic effects and expect them to be included in the ES.

2.39 The East Pye methodology requires a complete revision, integrating an evidence-led and agreed upon approach that includes phase-specific workforce and supply chain analysis to determine socio economic impacts set out in NPS EN-1 (5.13.4).

2.40 The assessment should clearly define its economic study area, ensuring alignment with workforce realities which inform various infrastructure modelling.

2.41 East Pye must conduct a baseline assessment, to better understand the region county and district in which it is developing, identifying workforce gaps and local supply chain opportunities.

2.42 Cumulative impacts require further analysis, with a focus on workforce displacement and competition, housing displacement, and supply chain overlap.

2.43 Mitigation measures must be strengthened, ensuring meaningful local economic benefits.

2.44 The Councils expect these recommendations to be incorporated into the ES and remains available for further consultation to ensure the highest standards of socio-economic impact assessment.

Highways

2.45 SCC, as the Local Highway Authority, is the lead authority on Traffic and Transport matters.

2.46 The project lies outside the boundaries of Suffolk, although there is a potential for the SCC highway network to be impacted in two ways.

<u>Cumulative impact</u>

2.47 A number of NSIPs adjacent to the A140 between Norwich and Ipswich may be delivered concurrently, namely:

- Norwich to Tilbury (Transmission)
- White Elm Solar
- East Pye Solar
- Ecopower Suffolk

2.48 The Councils would expect developers to provide programmes and estimates of construction vehicles for study by stakeholders to allow informed comments regarding the scoping of documents such as the Transport Assessment.

<u>Abnormal Load Movements</u>

2.49 The Councils understand that weight restrictions on bridges north of the site may require large loads such as transformers to be routed via the A140 to the south. Whilst accepting there is a notification process (ESDAL) this is a reactive, case-by-case method which does not proactively assess AIL routes. The Councils would expect the Applicant to undertake sufficiently

robust investigations to identify any restrictions on routes proposed for AILs and, where necessary, appropriate measures to resolve these issues.

2.50 For example, the bridge on the A140 in Brockford requires overbridging to allow transformers to cross. Construction of the temporary bridge requires closure of the A140 for many hours, disrupting regional and local traffic. The latter typically does not follow approved diversion routes, causing disruption to communities adjacent to the A140. Frequent disruption to the A140 due to AIL movements associated with this and other NSIPs would, in the Councils' view, necessitate investigation and repair of this and potentially other structures.

2.51 SCC has published a Traffic and Transport Supplementary Guidance Document to its Energy and Climate Adaptive Infrastructure Policy, which outlines SCC's expectations for pre-application engagement between the promoter and the Local Highway Authority. This can be found in Appendix D.

SCC Planning Authority

2.52 As a neighbouring authority, SCC defers to Norfolk County Council as the responsible authority for minerals and waste matters.

2.53 The promoter has omitted references to relevant Suffolk local planning policies in its Scoping Report.

2.54 Given the proximity of the Scheme to parts of Mid Suffolk and East Suffolk, the Councils consider there to be several relevant policies in the Babergh and Mid Suffolk Joint Local Plan and East Suffolk Council's Waveney Local Plan.

<u>Babergh and Mid Suffolk Joint Local Plan</u>

2.55 There are several policies from the Babergh and Mid Suffolk Joint Local Plan relevant to the proposals, including:

2.56 Policy SP05 – Employment Land, which notes the Councils' support for proposals for new employment development to provide skills and training packages which are supported by the relevant Local Planning Authority. This policy also notes the need for proposals to demonstrate adequate highway capacity.

2.57 Policy LP25 – Energy Sources, Storage and Distribution, which notes that the Councils' support for renewable and low carbon, decentralised and community energy generating proposals will be subject to their impact on a range of factors, including highway safety, residential amenity, and the local community being considered and mitigated against, where appropriate.

2.58 Policy LP29 – Safe, Sustainable and Active Transport, which notes the importance of proposals demonstrating safe and suitable access for all and prioritising sustainable and active transport. Any significant impacts on highway safety or the function of the highway network must be mitigated.

2.59 The full text of these policies, along with the corresponding supporting text for each, can be found in Appendix E.

<u>East Suffolk Council – Waveney Local Plan</u>

2.60 There are also relevant policies within East Suffolk Council's Waveney Local Plan, including:

2.61 Policy WLP8.21 – Sustainable Transport, which notes that the cumulative impact of new development must not create severe impacts on the transport network, and proposals should include measures to promote travel using non-car modes.

2.62 Policy WLP8.27 – Renewable and Low Carbon Energy, which states that renewable and low carbon energy schemes must not create significant adverse impacts on the amenities of nearby properties/businesses, adverse safety impacts, or significant adverse effects on the transport network. This policy also notes the requirement for decommissioning and site restoration to its original condition at the end of the development's operational lifetime.

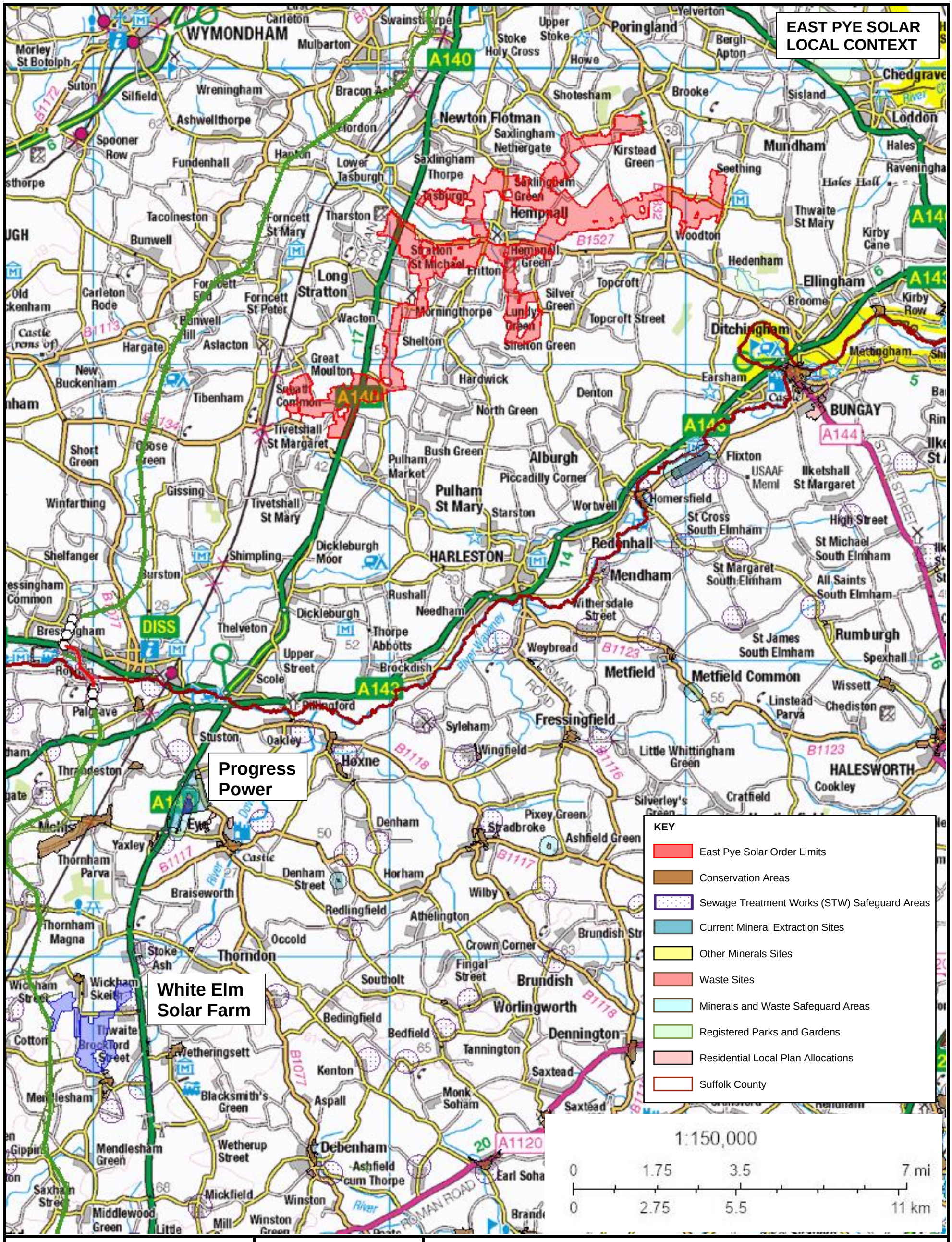
2.63 The full text of these policies, along with the corresponding supporting text for each, can be found in Appendix F.



East Pye Solar EIA Scoping

Comments of Suffolk County Council and Mid Suffolk District Council

Appendix A: A3 Portrait Plan Showing Local Context 150,000



© Crown copyright and database rights 2025 Ordnance Survey AC0000849963

Suffolk County Council

Growth, Highways & Infrastructure
Endeavour House
8 Russell Road
Ipswich
Suffolk
IP1 2BX

EAST PYE SOLAR

Scoping in respect of East Pye Solar Ltd's proposed East Pye Solar Development Consent Order (DCO) application

N W E S

© Natural England © Historic England © Network Rail © Drax Group © National Grid UK © RWE © SSE Renewables Offshore Windfarms Holdings Limited (SSER) and RWE Renewables UK Swindon Limited (RWE) © Suffolk County Council © East Pye Solar Ltd © Elmya Energy UK © Sunnica © ScottishPower Renewable Energy © NNB Generation Company (SZC)

Suffolk County Council

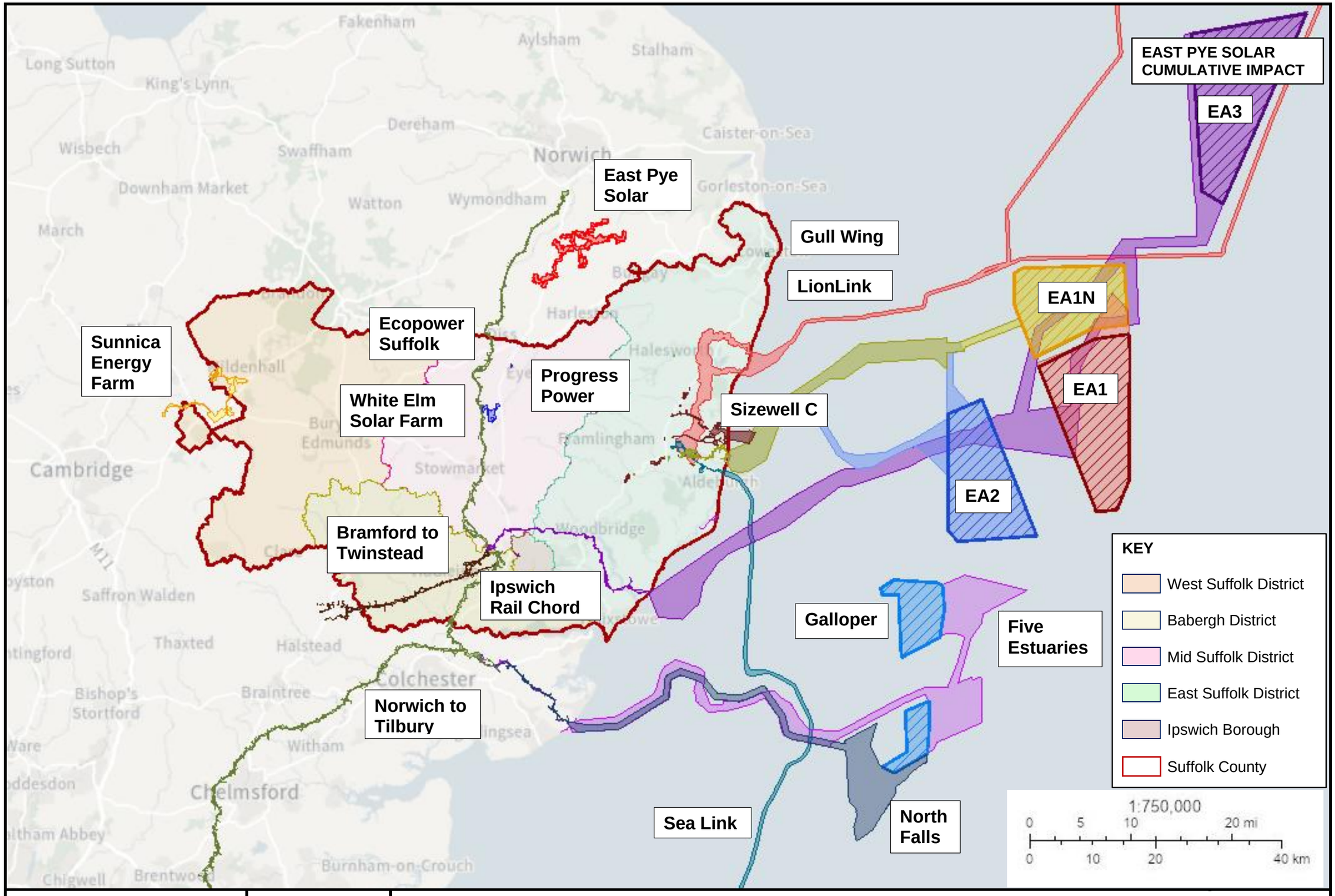
Babergh South Suffolk Mid Suffolk District Working Together



East Pye Solar EIA Scoping

Comments of Suffolk County Council and Mid Suffolk District Council

Appendix B: A3 Landscape Plan Showing Cumulative Impact 750,000



Suffolk County Council

EAST PYE SOLAR

Scoping in respect of East Pye Solar Ltd's proposed East Pye Solar Development Consent Order (DCO) application

N W E S

© Crown copyright and database rights 2025 Ordnance Survey AC0000849963

© Ordnance Survey © Network Rail © Drax Group © National Grid UK © RWE © SEE Renewables Offshore Windfarm Holdings Limited (SSER) and RWE Renewables UK Swindon Limited (RWE) © Suffolk County Council © East Pye Solar Ltd © Elmya Energy UK © Sunnica © ScottishPower Renewable Energy © NNB Generation Company (SZC)

Suffolk County Council

Babergh Mid Suffolk District Working Together



East Pye Solar EIA Scoping

Comments of Suffolk County Council and Mid Suffolk District Council

Appendix C: Energy and Climate Adaptive Infrastructure Policy Socio-economic Supplementary Guidance

Suffolk County Council

Energy and Climate Adaptive Infrastructure Policy

The Socio-economic Effects of NSIPs

including the assessment of skills, workforce, and supply chain requirements

Supplementary Guidance Document



Version 1.0 | 01/2025

This is a supplementary guidance document, to support the Energy and Climate Adaptive Infrastructure Policy[1], which was adopted by Suffolk County Council's Cabinet, on the 16th of May 2023.

The scope and purpose of this Supplementary Guidance Document

The principal purpose of this document is to set a methodology for the assessment of the skills, workforce, and supply chain requirements for major infrastructure projects.

Suffolk has natural and geographic advantages that make it attractive to project promoters for locating low-carbon technologies, and the consequent supporting infrastructure. This, therefore, creates significant challenges and opportunities for the economy, environment, and communities of Suffolk.

Major infrastructure projects, both alone and in combination with other projects, require a significant transitory construction workforce to ensure effective delivery. Projects may also require an operational workforce consisting of both permanent staff, and contractors, on a periodic or rolling basis, that engages and involves local and regional supply chains.

To deliver inclusive growth, project promoters will work with Suffolk County Council[2], to identify and deliver additional social value. National toolkits, frameworks, and individual case studies, such as those available through the HMG Social Value model[3], will assist with this process and the measurement of outcomes. A skills programme, for example, could achieve a reduction in long distance commuting, support other local businesses, as well as reduce health inequalities.

The purpose of this document is to set out how the County Council expects project promoters to:

- Identify the anticipated geography from which the workforce will be drawn, and the extent to which any non-home-based workforce is likely to require additional temporary accommodation, particularly during construction.
- Identify skills and labour force needs for the construction, operation and decommissioning of their project, whilst aiming to maximise the opportunities for local companies and employment.
- Identify anticipated workforce numbers, in detail, by skill set, and the duration for which each workforce type will be required, throughout the construction of the project.

1 https://www.suffolk.gov.uk/planning-waste-and-environment/major-infrastructure-projects-including-nsips/energy-infrastructure-policy

2 https://www.suffolk.gov.uk/business/tenders-and-supplying-us/social-value

3 https://www.gov.uk/government/publications/social-value-act-information-and-resources/social-value-act-information-and-resources

- Identify and analyse the linkages and dependencies between these workforce requirements and the implications for, transport modelling, accommodation and housing, and provision of local services including, but not limited to, health and public protection.
- Identify and analyse the extent to which the project's labour and skills demands may capture staff from the existing workforce, both alone and in combination with other projects, and assess any adverse outcomes for the delivery of services or for the local economy more widely.
- Consider and assess specific local sensitivities that may be adversely impacted by the workforce needs of the project, in respect of the natural environment and communities. These impacts must be accurately identified and appropriately mitigated.
- Identify the spatial and temporal relationships between their project and other projects, working collaboratively with other project promoters to both minimise and mitigate adverse impacts, and maximise positive impacts.

In addition to identifying and mitigating any potential harms in respect of workforce and skills, the County Council also expects the developer to support wider economic, employment, skills and educational objectives, in accordance with its Energy and Climate Adaptive Infrastructure Policy, albeit often outside of planning balance considerations.

Project promoters are expected to support the delivery and use of local and regional supply chains by:

- Supporting the increase and acceleration of inward investment of Tier one and Tier two contractors who may be working on multiple projects locally, recognising the project's regional role as part of Suffolk's energy cluster.
- Delivering opportunities for the growth of non-engineering or non-construction related businesses associated with the project, e.g. supporting the delivery of the project, including, but not limited to, catering, transport, and facilities management.



- Identifying and developing opportunities for research, development, and innovation, across the energy and construction sectors in Suffolk, and the region.
- Supporting the delivery of long term, sustainable opportunities, in the energy sector and related sectors, across Suffolk and the region.
- Recognising that it is essential to differentiate between the construction and civils opportunities of the project, and the mechanical and electrical engineering opportunities, during the construction cycle.
- Recognising that the mechanical and electrical engineering opportunities of the construction cycle, are likely to support and enhance the long term, permanent staffing and regional legacy benefits of the project.

Project promoters should deliver and enhance existing and emerging skills and educational initiatives by:

- Establishing with Suffolk County Council an agreed governance framework for the project's skills and educational enhancement, through Suffolk County Council's Regional Skills Coordination Function.
- Ensuring alignment with skills and educational initiatives in Suffolk, the Suffolk Social Value Skills Ask[4] and, where appropriate, the wider region.
- Coordinating, and assisting contractors to develop, initiatives to ensure sufficient supply of skills and capabilities being available at the right time, to enable both project delivery, and the growth of the energy sector in Suffolk.
- Promoting and securing inclusive growth, by working to ensure provision of opportunities that align with the regional need.
- Ensuring that skills and educational initiatives are fully inclusive, recognising and responding to the diverse needs of Suffolk's communities; taking action to create access and remove barriers to opportunities for those groups that require it.



4 https://www.suffolk.gov.uk/business/tenders-and-supplying-us/social-value

The assessment of socio-economic impacts

In several recent NSIP applications, the assessment of socio-economic impacts within the EIA was dominated by the characterisation of the local baseline conditions, with any meaningful assessment of effects being limited, or entirely absent. The Council considers that a focus on reproducing baseline information in the EIA is not effective, or sufficient, to understand the impacts of, or opportunities arising from, a project. Likewise, it does not allow the effective understanding of cumulative impacts or opportunities.

The principal purpose of this guidance is to ensure that project promoters deliver a robust and effective assessment of effects, both positive and negative, arising from their project's labour force and supply chain. The Council considers that these effects should be agreed, and understood, before modelling the project's effects, and consequent development of mitigations on: transport, accommodation and housing, and the provision of local services.

The outputs of socio-economic modelling have to form the foundation for the assessment of effects regarding transport, temporary accommodation, housing, and the provision of local public services and public protection.

The proposed approach to the assessment of socio-economic impact, and the labour force and skills needs, for the project alone, and in combination with other projects, is set out in the methodological guidance.

Methodological guidance for developers

In the absence of any formal or agreed national standards for the assessment of skills and supply chain requirements and effects, the county council outlines a methodology here. This is intended to form the basis of detailed discussions with the project promotor prior to any assessment work being carried out.

The following elements are to be provided or assessed in detail by the project promoter:

- Assess the existing socio-economic environment and baseline.
- Assess the relevant strategy and policy.
- Assess the education and training infrastructure and their capacity to supply, or ability to expand through investment, to provide additional local learning or training opportunities. These are required to support the supply of relevant skills, competencies, and capabilities.
- Provide a comprehensive supply chain assessment, including the details of what relevant businesses exist locally; and what their capacity to supply, or ability to expand is, to meet the project's requirements.

The purpose of assessing these elements is to arrive at agreed and evidenced, percentages of local employment (direct, indirect, and induced) and supply chain effects in low, medium, and high engagement scenarios, allowing the applicant, with confidence, to provide:

- Direct employment numbers (and associated GVA).
- Indirect employment numbers (local/regional supply chain) (and associated GVA).
- A robust temporal model of the needs of the project in terms of labour force numbers and skills, during its construction, operation and decommissioning.

The applicant will also provide evidence that the methodology used to calculate induced employment, (and associated GVA) correlates with the above.

Regarding data sources, the applicant should work with Suffolk County Council's Regional Skills Coordination Function, and the skills and economic functions of Local Authorities, to support identification of relevant and up to date sources of local and regional data.

These findings inform transport modelling, accommodation and housing, and provision of local services, including but not limited to, health and public protection.

Therefore, the project promoter and the County Council will need to agree the detailed assessment methodology, prior to this work being undertaken. Subsequently, the County Council and project promoter will need to agree that the outputs are acceptable and robust, such that they can inform both the socio-economic modelling and the potential impacts, on transport modelling, accommodation, housing and local services.

The most important information for the County Council to understand, from all project promoters, is how many people, and what skills are required, for what period of time, for both the workforce and supply chain.

Most consenting applications spend time and effort scoping what the region looks like, the employment level, skills and attainment levels, unemployment etc. The County Council is aware of the existing conditions, and although these do need to be correctly set out in an EIA, the work should focus on correctly identifying the impacts of the proposal.



The county council considers that the following elements are essential to ensure effective analysis:

1. Identify the workforce requirements and impacts
2. Identify the geography of the supply chain
3. Identify skills and workforce effects during construction, operation and decommissioning
4. Identify supply chain effects during construction, operation and decommissioning
5. These elements should then be combined to create an effective analysis of socioeconomic impacts and opportunities.

1. Identify the workforce requirements and impacts

Project promoters will identify the anticipated geography from which the workforce will be drawn. Due to the distinct difference between workforce and supply chain, the applicant is expected to define a separate economic study area for these two distinct elements.

Inputs

Workforce definition

- Define the distinct workforce phases of the project (e.g. Civils, Mechanical & Electrical, Commissioning etc) at the most granular level that data and knowledge support.
- Identify the duration of phases, and skills required within them.
- Once these elements are defined, the applicant can begin to define an economic study area for the workforce considering the following:
- The propensity for travel is different for skilled and unskilled workers and will also differ depending upon the duration of role.
- The availability of public transport and the local road network.
- The preferred method of travel to work.
- Correlation to Traffic and Transport methodology.

Outputs

Workforce analysis

- A defined geography from which unskilled/semi-skilled labour can be expected to be drawn from, for each distinct work phase.
- A defined geography from which skilled labour could be expected to be drawn from, for each distinct work phase.

2. Identify the geography of the supply chain

Inputs

Supply chain definition

As supply chain can be drawn locally, nationally and internationally, the geography defined here should represent areas that are impactful for the region. Therefore, hyper local should be defined as the Local Authority District hosting the project, local defined as the County hosting the project and then impact also considered at a regional level.

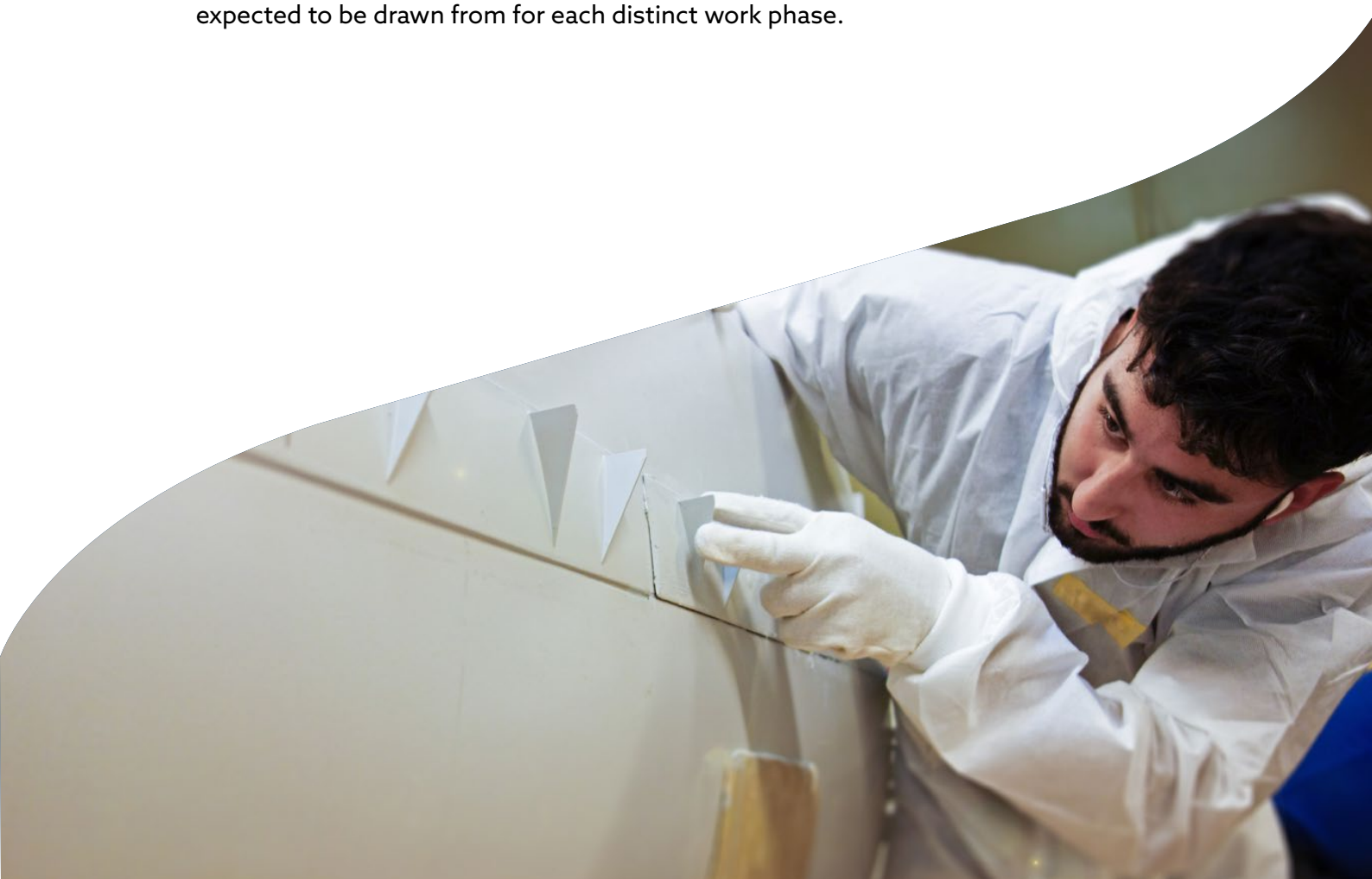
For example, a project located in Stowmarket will use and define its supply chain geography as:

- Hyper Local – Mid Suffolk (Local Authority District).
- Local – Suffolk (County).
- Regional – East of England (Region).

Outputs

Supply chain geography and temporal phasing

A defined geography from which local and regional supply chain companies could be expected to be drawn from for each distinct work phase.



3. Identify skills and workforce effects during construction, operation and decommissioning

Once defined geographies and work phases have been agreed between the applicant and the Council, for workforce and supply chain respectively, these can then be used to identify the size of the home-based employment opportunity. This assessment should be done using a low, medium and high probability scenario for home based employment opportunities. The worst-case scenario should always be the scenario used for identifying impacts and the corresponding effect on transport, accommodation and housing and local services modelling. The probability scenario will also refer to cumulative impact.

Inputs

Skills and workforce analysis

The applicant will need to produce an assessment, for each distinct workforce phase of the project as defined above, this should not include the indirect and induced employment opportunities that would occur if a local company were to receive a contract on the project. These will be accounted for separately, to avoid any double counting of benefit or negative impact.

Probability of home-based employment

Probability of home-based employment opportunity	Descriptors

Low	• Little or no established demand skill sets in the workforce.
	• Reliance on market to respond.
	• No intervention from either the applicant or any local/regional stakeholders.
	• High employment levels leaving little to no capacity in the marketplace.
	• Low levels of applicable skills.
	• Low population level.
	• Short duration of employment opportunity.
	• Significant proportion of population in identified geography are not of working age or economically inactive.
	• Constraints on local capacity:
	  • The project is unique to the area, and therefore limited opportunity to create an employment pipeline.
	  • Comparative projects being developed in the area leading to employment saturation.
	• Limited public transport.

Medium	• Labour force with some appropriate skills. • The usual levels of unemployment in relation to the wider economic geography.
High	• High levels of unemployment. • Significant labour force with appropriate skills. • High proportion of people of working age. • Long duration of employment opportunity. • Plausible transport links including public transport. • Comparative projects being developed in the area, with an opportunity for an employment pipeline to be created. • Planned interventions from the applicant and local and regional stakeholders. • Local training and education offer that can provide relevant skills.

Outputs

Skills and workforce definition and scenarios

This will need to define and quantify the following:

- The definition of a worker.
- The size of home-based employment opportunity.
    - Low scenario will represent worst case scenario to be used in all assessment work on impact.
- The size of non-home-based worker population.
    - Low scenario of home-based employment opportunity is to be used, as this will represent the worst-case scenario for modelling impacts on transport, accommodation, housing, and local services.

Employment should always be referred to as an opportunity. It cannot be assumed that just because there is an opportunity that this will result in employment happening. The job of the Council, collaboratively with the applicant, is to fully understand the size and nature of the opportunity. If it is agreed that there is an opportunity, the Council and applicant will then work to build a skills pipeline to help meet both current and any likely future demand, by working collaboratively with other key stakeholders to develop programmes and processes that will ensure people have the right skill at the right time, and so have an opportunity to gain employment with the project.

4. Identify supply chain effects during construction, operation and decommissioning

The effect on supply chain will be quantified to allow evidenced judgements to be made in the following areas:

- Contribution to the development of, and support of, local and regional businesses.
- Any indirect beneficial impacts for the region hosting the infrastructure, in particular in relation to use of local support services and supply chains.
- Any negative impacts, direct and indirect, for example potential wage inflation that would stifle growth.

At this early stage of the project lifecycle there will be no supply contracts in place. Therefore, a scenario-based approach using probability of supply should be used. The project promoter will need to evidence the supply chain opportunity across all elements of the project, considering cumulative impacts with other projects.

Inputs

Supply chain phasing and capacity

The applicant will produce an assessment that identifies:

- The distinct supply chain opportunities within each identified work phase.
- Businesses within each identified geography that can deliver the service or goods sought.
- The likelihood of these businesses being able to take up an opportunity to compete for this work.

Defining the supply chain opportunity

Probability of supply chain opportunity (Hyper Local, Local and Regional)	Descriptors

Low	• Little or no established businesses offering applicable goods or services.
	• Reliance on market to respond.
	• No intervention from either the applicant or any local/regional stakeholders.
	• Short duration of opportunity.
	• Constraints on local capacity:
	  • The project is unique to the area, and therefore limited opportunity to create a growth opportunity.
	  • Comparative projects being developed in the area leading to saturation.

Medium	• Businesses established with some appropriate skills. • Businesses experiencing their usual levels of work in relation to the wider economy.
High	• There are multiple businesses with appropriate skills. • Long duration of opportunity. • Comparative projects being developed in the area, with an opportunity for growth to be created. • Businesses have capability and capacity to take on additional contracts. • Planned interventions from the applicant and local and regional stakeholders.

Outputs

Supply chain characterisation and scenarios

These shall consist of:

- A defined list of goods and/or services that will be procured, by work phase, including any offsite fabrication/manufacture elements.
- The duration of all the identified elements.
- A scenario-based approach to probability of supply from hyper local, local and regional businesses against the identified elements.
- The size of hyper local, local and regional supply chain opportunities.
    - The low scenario will represent worst case scenario, to be used in all assessment work on impact.



5. Socio-Economic Impacts

Once the above elements have been assessed satisfactorily the promoter alongside Local Authorities can now make evidenced judgements against the areas set out in NPS EN-1 (5.13.4)[5]:

- The creation of jobs and training opportunities.
- The contribution to the development of low-carbon industries at the local and regional level, as well as nationally.
- The provision of additional local services and improvements to local infrastructure, including the provision of educational and visitor facilities.
- Any indirect beneficial impacts for the region hosting the infrastructure, in particular in relation to use of local support services and supply chains.
- Effects (positive and negative) on tourism and other users of the area impacted.
- The impact of a changing influx of workers during the different construction, operation and decommissioning phases of the energy infrastructure. This could change the local population dynamics and could alter the demand for services and facilities in the settlements nearest to the construction area (including community facilities and physical infrastructure such as energy, water, transport and waste). There could also be effects on social cohesion depending on how populations and service provision change as a result of the development.
- Cumulative impacts - if development consent were to be granted for a number of projects within a region and these were developed in a similar timeframe, there could be some short-term negative effects, for example a potential shortage of construction workers to meet the needs of other industries and major projects within the region.

5 https://assets.publishing.service.gov.uk/media/65bbfbdc709fe1000f637052/overarching-nps-for-energy-en1.pdf

Version 1.0 | 01/2025

Suffolk County Council

Working Together



East Pye Solar EIA Scoping

Comments of Suffolk County Council and Mid Suffolk District Council

Appendix D: Energy and Climate Adaptive Infrastructure Policy Traffic and Transport Supplementary Guidance

Suffolk County Council

Energy and Climate Adaptive Infrastructure Policy

Traffic and Transport

Supplementary Guidance Document



Version 1.0 | 01/2025

This is a supplementary guidance document, to support the Energy and Climate Adaptive Infrastructure Policy, which was adopted by Suffolk County Council's cabinet, on the 16th of May 2023.

The scope and purpose of this Supplementary Guidance Document

Suffolk has natural and geographic advantages that make it attractive to project promoters for locating specific low-carbon technologies. This, therefore, creates significant challenges for the economy, environment, and communities of Suffolk.

The purpose of this Supplementary Guidance Document is to outline how, in principle, the Council:

- Wishes for applicants to offer pre-submission engagement with the Local Highway Authority to reduce and minimise issues arising later in the NSIP process and ensure that the Examination focusses on matters of public safety and scheme preparedness for construction, operation, and decommissioning.

This Supplementary Guidance Document has been drafted in collaboration with Norfolk County Council and Essex County Council.

Key Acronyms

AIL	Abnormal Indivisible Load
DMRB	Design Manual for Roads and Bridges
HGV	Heavy Goods Vehicle
LGV	Light Goods Vehicle
LHA	Local Highway Authority
MfS	Manual for Streets
PROW	Public Rights of Way
SCC	Suffolk County Council



Contents

The scope and purpose of this Supplementary Guidance Document 2
Roles and responsibilities 4
Relevant Policy Considerations 5
1.1 The status and importance of Public Rights of Way in Suffolk 6
1.2 Assessment of Traffic and Transport 6
1.3 Management Plans 8
1.4 Highway Boundary 10
1.5 Link Sensitivity 11
1.6 Site Accesses 11
1.7 Highway Works 13
1.8 Movements 16
1.9 Protective Provisions or Highway Agreements 17
Sources of further information 18
Contact 18

Roles and responsibilities

The Role of the Local Highway Authority

The Planning Inspectorate's Nationally Significant Infrastructure Projects: Advice for Local Authorities outlines the generic role of local authorities throughout the NSIP process. These responsibilities include inter alia: production of a Local Impact Report (LIR), written representations, and any Statement of Common Ground (SoCG).

The Local Highway Authority (LHA) is responsible for maintaining and repairing the highway, as well as providing and managing flood risk for highway drainage and roadside ditches. Section 16 of the Traffic Management Act 2004 places a duty on the authority to secure the expeditious movement of traffic on the authority's road network and facilitate the same on road networks for which another authority is the traffic authority.

The Local Highway Authority is consulted by the Local Planning Authority on any planning applications that may have an impact on the highway. The LHA may request mitigation measures in form of works to the highway, provision of active travel, sustainable transportation, and/or financial contributions towards strategic programmes. In regard to NSIPs, the role of the LHA extends to drafting the Traffic and Transport section of the Local Impact Report, responding to the transport sections of the Environmental Statement, relevant management plans such as the Construction Traffic Management Plan, Transport Assessment and Travel Plan during the examination and providing guidance on safe visibility splays for site accesses amongst other responsibilities.

SCC would highlight the value of pre-submission engagement with the local highway authority. Amongst other benefits, this early consultation will benefit the process by way of agreeing the methodologies which will inform the Transport Assessment and Environmental Statement chapter on Transport and Access Impacts. Thus, avoiding later disagreement during the Examination stage. Previously, SCC has had experience of inaccurate assumptions used and input into the transport assessment and deficiencies in the highway-related provisions in the draft development consent order (dDCO). If pre-submission engagement is not undertaken, considerable resources will be required to be dedicated to remedial work during the concentrated 6-month Examination stage.

Not all public highways are maintainable by Suffolk County Council,[1] therefore, to find out whether a road or path is maintainable by the local highway authority please review the National Street Gazetteer.

1 www.suffolk.gov.uk/roads-and-transport/highway-maintenance/road-adoption/highways-and-private-roads

Relevant Policy Considerations

The Overarching National Policy Statement for Energy (EN-1) (2024) outlines Traffic and Transport outlines impacts relating to highways in Nationally Significant Infrastructure Projects.

Suffolk County Council's Energy and Climate Infrastructure Policy (2023) is a local policy setting out our approach to dealing with proposals for critical energy and climate adaptive infrastructure, and engagement with Government departments and agencies.

The Design Manual for Roads and Bridges (DMRB) is a set of national documents containing the requirements for the design, assessment and operation of trunk road and motorways.

The Manual for Streets (2007) and Manual for Streets 2 (2010) are two complimentary national guidance documents for local authorities on designing residential and busier urban streets respectively.

The IEMA Guidelines for the Environmental Assessment of Traffic and Movement (2023), are national guidelines and should be considered by developers when assessing traffic and transport impacts.

The Local Transport Note 1/20, more commonly known as LTN 1/20, is a national policy document focussed on active travel and outlines the requirements for cycling infrastructure such as cycle lanes and parking.

Suffolk County Council's design documents: Suffolk Design: Streets Guide (2022), Suffolk Guidance for Parking (2023), SCC Development Design Manual, Application for Agreements or Minor Works Licence, and Travel Plan Guidance are local policy and guidance documents outlining the expectations of design in the county of Suffolk.

Suffolk County Council's Recommended Lorry Route Network Map is a local geospatial referencing tool that should be utilised by developers when considering HGV and AIL movements.





1.1 The status and importance of Public Rights of Way in Suffolk

The County Council's clear preference is that Public Rights of Way and amenity should be dealt with in their own chapter of the Environmental Statement, in order that the impact of a scheme on the rights of way network and its receptors can be properly understood, including the interactions between different parts of the scheme, both temporally and spatially.

Please refer to Suffolk County Council's supplementary guidance document for Public Rights of Way and Green Access for more information.

1.2 Assessment of Traffic and Transport

Unless otherwise scoped out through discussions, the DCO will require an assessment of the traffic and transport impacts of the scheme. The assessment is typically divided between two documents: the Transport Assessment and a separate Chapter within the Environmental Statement. Other topics such as noise, air quality and vibration may also be relevant to transport. There is often crossover between the information provided within the two documents and it is expected that they would include the following, with the level of detail provided commensurate with the scale of development and impacts:

- Baseline transport network description
- Sustainable transport routes
- Assessment of road safety
- Traffic generation for construction and operation (including methodology and profile across construction). Including:
    - Worker numbers
    - Worker shift patterns
    - Light vehicles numbers
    - HGV numbers
    - AIL numbers
- Traffic distribution (including methodology) and construction traffic routeing
- Committed development
- Traffic and multimodal survey data
- Junction assessments
- Opportunities for transporting construction materials by sustainable modes
- Mitigation, including enhancement for sustainable transport
- Methodology for assessing environmental impacts, including:
    - Consideration of Institute of Environmental Management and Assessment Guidelines
    - Consideration of Design Manual for Roads and Bridges document LA112 – Population and Human Health
    - Assessment timeframes (i.e. daily and hourly)
    - Impact criteria
    - Link sensitivities
    - Cumulative effects
    - Assessment of vegetation loss through Arboricultural Impact Assessments (in accordance with the current BS 5837 Trees in Relation to design, demolition, and construction) and Hedgerow Assessments (in accordance with the Hedgerow Regulations 1997)
    - Proposed mitigation and compensation for vegetation loss resulting from new access points and haul roads, including bespoke compensation agreed with local planning authorities on a case-by-case basis for the loss of irreplaceable habitat (such as veteran trees). This should include aftercare and long-term management of any mitigation planting.

When considering the assessment of environmental impacts of traffic and transport, Applicant's should be mindful that any thresholds being applied are starting points for considering impacts, often based on limited evidence, and should be treated very cautiously. The rationale for impact criteria, thresholds and link sensitivities should be well-evidenced and reflect the specific considerations of each location.

It is considered sensible that the Applicant undertakes scoping discussions with SCC to identify and agree the appropriate assessment methodology.

1.3 Management Plans

Typically, at application stage many matters will be subject to confirmation following appointment of a contractor. In such cases the management plans should be considered as outline documents with final approval secured by a requirement.

Clarity will be required regarding inclusion of pre-commencement works in the management plans, or if not, how transport impacts arising from these will be managed.

For some schemes additional management plans may be beneficial:

Outline Port Operational Plan, typically for offshore wind farms where considerable construction activities may be focussed on a port. Being outline it allows flexibility in selecting the port at a later date.

Access Management Plan, when a project includes significant numbers of accesses that need detailed consideration at this stage. This assists by removing such voluminous detail from the Transport Assessment.

A Pre-Commencement Management Plan will be suggested where a project requires/generates significant construction traffic prior to the works commencing or significant temporary works on the highway such as accesses for surveys. An additional benefit may be inclusion of the environmental impacts that occur before the Code of Construction Practice is triggered.



Construction Traffic Management Plan (CTMP)

During the DCO process the CTMP is an important document that sets out how the applicant will access the highway network for delivery of materials and for construction associated with the NSIP. Importantly it sets out the process for managing construction traffic, which can ensure the environmental impacts do not exceed those assessed, that it complies with the sustainable transport objectives of policy and helps to reduce impacts on the local community.

The type of information the highway authority would expect to receive as a minimum would include:

- The elements of the works that will be subject to the CTMP
- Information on the site's access arrangements including cross reference to the environmental impacts such as vegetation removal
- Construction phasing
- Construction traffic numbers
- Construction traffic routeing
- AIL routeing
- Staff sustainable travel initiatives
- Controls, monitoring and reporting mechanisms, reflecting assessed impacts
- Enforcement of controls
- Responsibilities
    - Traffic management measures and the duration of traffic management
    - Safety measures
    - Closures of any carriageway or footways
    - Temporary Traffic Regulation Orders

This information should be accompanied with drawings showing Temporary Traffic Management proposals, Traffic Management phasing plans and any speed reduction extents. It is considered sensible that a Draft CTMP is discussed with SCC prior to submission.

It is also considered that the CTMP should appropriately address the meaning of the term 'maintenance' to define the implications of vehicle movements generated.

2 LGVs are defined as vehicles under 3.5 tonnes used for work purposes (not including private cars used get to and from site).

Travel Plan (TP)

During the DCO process, the TP can be a combined document with the CTMP for simpler projects or separated. SCC provides guidance for Travel Plans and Parking. The Travel Plan should identify the following:

- Car and Light Goods Vehicle (LGV)[2] movements to and from the site (clarity is required whether LGVs will be included within the car share ratios, mini-buses included in 'LGV numbers')
- Staff movement to and from the site, based on total numbers of vehicles and compliance with shift patterns (including movements outside shift times and car share ratio)
- Information on complaints received on transport related issues including parking
- Commitment to report the car park survey outputs to the relevant authorities
- Sustainable transport options and how their use can be optimised

Mitigation Hierarchy

Mitigation and compensation measures (including financial compensation) for residual adverse impacts during construction and operation.

Project promoters are expected to follow the mitigation hierarchy, as set out in the Glossary of NPS EN-1. This requires avoidance and minimisation of adverse impacts on the highway; and where this is not possible, any temporary or permanent loss of access and amenity, due to the construction or operation of new infrastructure will need to be mitigated and compensated for, through the development of alternative routes, and/or improvement to the existing highway network.

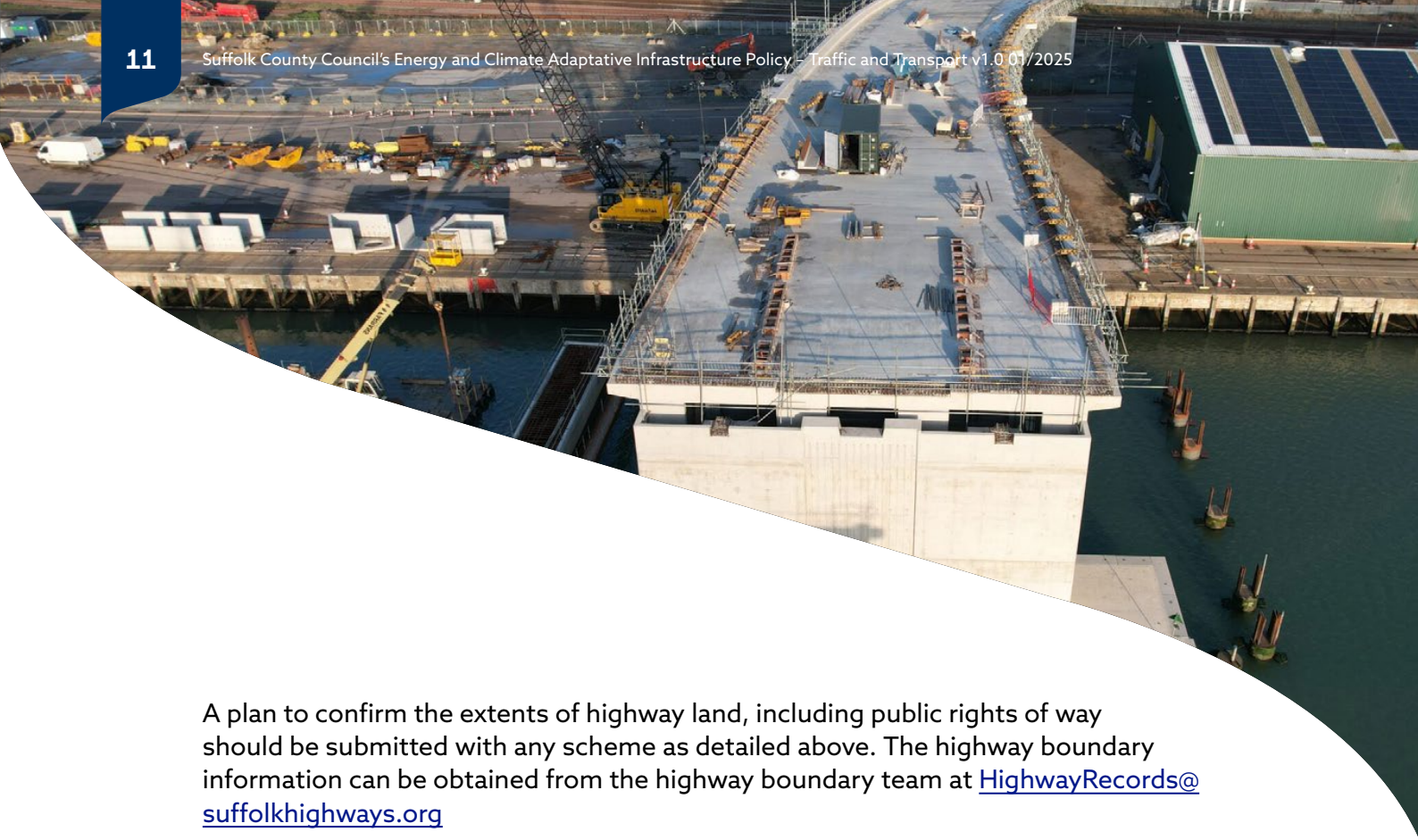
It is the Council's clear preference that adverse impacts on the highway should, in all cases, be fully mitigated and compensated for with embedded mitigation as part of the project design. However, where this is not possible, financial compensation will be required.

1.4 Highway Boundary

NSIPs can result in exceptionally large requests for highway boundary information, as a result advanced notice and consultation with Suffolk County Council is recommended to reduce any potential delay.

Any access required to facilitate development, including that for safe visibility, has to be either within highway or on land within the applicant's control.

The highway authority will not accept a scheme for an access which does not evidence control of the necessary land.



A plan to confirm the extents of highway land, including public rights of way should be submitted with any scheme as detailed above. The highway boundary information can be obtained from the highway boundary team at HighwayRecords@suffolkhighways.org

Failure to do so has been found to leave gaps between the land controlled by the applicant and the highway boundary, challenging delivery of highway works.

1.5 Link Sensitivity

The methodology for determining link sensitivity should be discussed with the LHA during pre-application. In principle, however, the IEMA Guidelines for the Environmental Assessment of Road Traffic are recognised as an appropriate method. Care is required to ensure these reflect the characteristics of the network in a local context, for example absence of pedestrian facilities should not imply that no pedestrians use the highway.

1.6 Site Accesses

The LHA cannot accept a scheme for an access or any other works without evidence that it can be constructed either within the highway and/or within land in the control of the applicant (i.e. within the redline of the DCO). Whilst generic layouts have some use, the applicant should also consider the nature of the existing road particularly bends, crests, drainage features, utilities buildings and vegetation.

The potential effects resulting from new accesses (and internal haul routes) on landscape features (such as trees and hedgerows), ecological and cultural heritage assets need to be fully assessed (including those that may be affected by the

proposals and are located outside the DCO boundary) and avoided and minimised as far as possible. Where adverse effects cannot be avoided or further minimised, mitigation and, if necessary, compensation will need to be secured through the appropriate control documents, such as the Outline Landscape and Ecology Management Plan (OLEMP) during the Examination, and the detailed LEMP post-consent.

As a general rule, any highway works that are likely to remain in place for more than 5 years will be treated as permanent in terms of design and consenting process unless otherwise agreed in consultation with the LHA.

Visibility Splays

Applicants should be mindful of the tensions between guidance for visibility splays. The DMRB and MfS are useful starting points, the former for rural high speed roads and the latter for urban low speed streets. The Suffolk Design: Streets Guide (2022) Appendix F (MfS Position Statement) provides additional detail.

Where speed data is unavailable, SCC would expect the applicant to design on the 'posted' speed limit albeit, where speed limits are present, care should be taken that drivers comply with these.

The preference is to use speed survey data to determine safe visibility dimensions using DMRB or MfS calculated stopping distances.

The applicant may wish to employ temporary speed limits, for example to reduce the loss of roadside vegetation, applying the mitigation hierarchy. SCC would welcome and support this in principle. However, where temporary speed limits are proposed to reduce the visibility distance, the applicant must evidence how compliance with such limits can be achieved without calling on additional police enforcement.

In all cases any departures from visibility specifications must be agreed with the LHA prior to application of the DCO.



1.7 Highway Works

Any access or works relating to the construction/delivery of infrastructure that take place within or below the highway will need approval from the highway authority.

It is important to note that different roads fulfil different functions, and accordingly the design and delivery of highway infrastructure including accesses should not be approached on the basis that 'one size fits all'.

When considering the delivery of NSIP associated infrastructure, account should be taken of the function of the route on which a planned access or other improvement is to be delivered.

The intention is to ensure that highway works are carried out that are 'fit for purpose' and consider the function and nature of the route within the context of the duties imposed by the Traffic Management Act 2004, which places a duty on Local Authorities to keep traffic (including pedestrians) moving. There is particular concern about the operation of the Strategic Route Hierarchy Road network and Primary Routes, which will need to be managed during the delivery of schemes.

Where appropriate all physical works must be compliant with the Equality Act 2010 and the guidance given in the DfT document Inclusive Mobility.

Information for Technical Review

An NSIP may require works to be undertaken to the highway and these may be temporary or permanent. The applicant should prepare detailed design drawings for the highway works associated with the development. These proposals should be submitted to the highway authority for technical review and must include the following:

- Detailed Engineering Layout Plans to an appropriate scale (ideally either 1:250 or 1:500) on a detailed topographical survey base model.
- The topographical survey must be of a standard suitable for detailed design and construction (not just for planning permission or preliminary design).
- The package of detailed design plans may include (where applicable):
    - General Arrangement
    - Site Clearance (including existing vegetation to be removed, based on tree and hedgerow surveys)
    - Safety Fencing and Vehicle Restraint System (VRS)
    - Drainage
    - Levels Layout (including contours plan)
    - Earthworks
    - Pavement Construction/Carriageway Surfacing
    - Kerbs, Footways and Cycleways
    - Traffic Signs and Road Markings (including Signage Schedule)

- Traffic Signals
- Street Lighting and Electrical Works
- Existing Utilities and details of proposed diversions
- Landscaping
- Swept path analysis (Auto track runs)
- Visibility splays at junctions
- Extents of proposed Traffic or Temporary Regulation Orders (TRO / TTRO)
- Third party consents when required for the highway forks (e.g. land drainage consent)

Delivery of Works

The highway works shall be delivered by a Highway Works Agreement (HWA) (i.e. a Section 278 agreement or, at the discretion of SCC, a Minor Works Authorisation). The agreement will be needed over and above the granted DCO and should be referenced in the appropriate chapters of the DCO/and or the Statement of Common Ground as the appropriate mechanism for the delivery of highway works. Alternative delivery mechanisms should be avoided since they will depart from SCCs standard operating procedure and lead to delay.

As part of the delivery of works a Project Engineer will be assigned. They will act as the focal point for all responses and coordination within SCC across the highways service. All communication between the developer and SCC should be through the assigned Project Engineer so that they can maintain a holistic view of the project.

Minor Works Authorisation Agreement

In some instances, for minor works the Project Engineer may consider a minor works authorisation in lieu of a Section 278 Agreement. A minor works authorisation does not require the involvement of legal teams and is an agreement that is signed by the Developer and includes a list of Terms and Conditions.



Section 278 Agreement

Section 278 Agreements, as a minimum, will require:

- Securing of a bond to ensure that third party funds are available to complete the highway works to the satisfaction of the County Council
- Payment of the County Council's works inspection fees, maintenance fees, special order fees, supervision fees and any other such fees as the County Council shall require
- Payment of the County Council's legal, administrative and other fees and disbursements associated with the drafting and completion of the HWA
- Preparation and advance approval of works drawings and traffic management measures
- Certification and maintenance of the highway works
- Regulating of the issue of the Works Licence to enable the Highway Works to be carried out
- The securing of a bond relating to both Land Compensation Act 1973 matters and Noise Insultation Regulations 1975 as amended by the Noise Insulation (amendment) Regulations 1988 (SI 1988/2000) and any other indemnity and bonds for liability issues as the County Council shall require
- The dedication of land as public highway (where required)
- The standards and procedures for carrying out the Highway Works; and
- Traffic regulation orders and statutory processes

The applicant will be expected to prepare the detailed design for the works. The design will need to be checked by the highway authority and may require alterations to achieve technical approval. The technical approval process normally has a minimum timescale of 6 months.

Safe methods of construction and traffic management must be considered by the designer, and the Construction (Design & Management) Regulations 2015 complied with where applicable. Early contractor involvement in the design process is strongly recommended.

For most schemes, the applicant will arrange construction of the works, which should be undertaken by a Suffolk County Council approved contractor in accordance with the approved drawings and under the supervision of Suffolk County Council staff.

Full details on the elements required for a HWA submission, including design requirements, processes, fees and timescales, are set out in SCC's website.

3 www.gov.uk/government/publications/special-types-enforcement-guide/special-types-enforcement-guide

1.8 Movements

Heavy Goods Vehicles

For advice from the Local Highway Authority on HGV routes, please refer to Suffolk County Council's Recommended Lorry Route Network Map.

For DCO's there is general acceptance that this term includes all vehicles in excess of 3.5 tonnes laden weight.

Normally, SCC will expect routing and timing of HGVs to be secured in the DCO through the CTMP. Where HGV volumes are significant or the applicate has made assumptions that cannot be evidenced SCC would also require caps on movements.

Abnormal Indivisible Loads (AIL)

For movement of AILs, there is the necessity for early liaison with the relevant highway authority's structures team to ensure that all necessary surveys, assessments and where relevant strengthening of structures can be completed before movement of such loads are required.

As a minimum, SCC expects applicants to show a feasible route from a point of origin (SRN or Port) and the site. Such route study should identify the largest load required and consider matters such as structural capacity of bridges and swept paths. The latter must be within the highway boundary or the order limits to avoid oversailing of third-party land.

Further information on special categories can be found in the Special Types Enforcement Guide published by the Driver and Vehicle Standards Authority.[3]

Worker Movements

Movements should be clearly set out in the relevant sections of the application together with all assumptions made in calculating these, preferably with supporting evidence. In particular, vehicle occupation ratios should be supported by evidence from other similar projects.

Particular care should be taken on relying on shift patterns that presume movements are outside network peak hours. How this can be monitored and controlled will need to be documented to give assurance that this mitigation would be effective. Care should also be taken where projects in close proximity rely on the same mitigation as this may create a different network peak.

Details of how sustainable transport can be optimised for workers together with provision of infrastructure needed to support this needs to be set out in the management plan. On site parking provision and measures to prohibit 'fly parking' shall also be included.

1.9 Protective Provisions or Highway Agreements

It has been commonly accepted in recent DCO's that SCC will secure either Protective Provisions or a Highway Agreement with the Applicant to ensure that its role as Local Highway Authority is protected.

This shall be drafted to allow SCC to recover reasonable costs including but not limited to:

- Additional costs of routine, cyclic and emergency highway maintenance resulting from the Applicants' occupation or use of the highway
- Visual and structural condition surveys of the highway and contributions towards structural repairs to HGV routes
- Surveys and assessment of highway structures to facilitate AIL movements
- Damage to the highway (in accordance with the provisions of Section 59 Highways Act 1980)
- Creation of temporary traffic regulation orders (including SCC consultation and issue of permits)
- Relocating / removing street furniture and all other highway infrastructure to facilitate AIL movements and reviewing conditions of highway structures
- Technical approval and inspection of highway accesses and payment of bonds or sureties
- Review of submitted materials for monitoring the final management plans (such as CTMP/ Travel Plan / PRoW Strategy etc)
- Payment regime for the above

Any agreement or provision shall an include an indemnity for the local highway authority against losses which may be incurred. The LHA considers, as a matter of principle, an indemnity ought to be provided. Indemnity covers loss incurred because of, for example, the construction or maintenance of highway works. SCC is of the belief that those responsible for the loss should be responsible for its cost, rather than placing the higher financial burden on the LHA. It is essential the indemnity covers third party claims.

Sources of further information

Planning Inspectorate

- Overview of the NSIP process: www.gov.uk/guidance/nationally-significant-infrastructure-projects-and-the-people-and-organisations-involved-in-the-process
- Advice for Local Authorities: www.gov.uk/guidance/nationally-significant-infrastructure-projects-advice-for-local-authorities

Suffolk County Council

- Information about the Council's energy infrastructure policy and strategic engagement with Government: www.suffolk.gov.uk/asset-library/energy-and-climate-adaptive-infrastructure-policy.pdf
- Public Rights of Way and Green Access Supplementary Guidance Document: www.suffolk.gov.uk/asset-library/prow-greenaccess.v4.pdf
- Overview of NSIPs in Suffolk and where SCC publishes it's Relevant Representation's and Local Impact Report's: www.suffolk.gov.uk/planning-waste-and-environment/major-infrastructure-projects/nationally-significant-infrastructure-projects-nsips
- PPA guidance: www.suffolk.gov.uk/asset-library/planning-performance-agreements-for-nationally-significant-infrastructure-projects.pdf

Contact

If you have any queries arising from this guidance, please contact Suffolk County Council's NSIP team at nsips@suffolk.gov.uk

Version 1.0 | 01/2025

Suffolk County Council

Babergh South Suffolk Mid Suffolk District Working Together



East Pye Solar EIA Scoping

Comments of Suffolk County Council and Mid Suffolk District Council

Appendix E: Extracts from Babergh & Mid Suffolk Joint Local Plan

Policy SP05: Employment Land

SP05 – Employment Land

1) In order to support and encourage sustainable economic growth (i) the designated strategic employment sites (as identified in Table 6 and on the Policies Map) shall be protected and employment uses within them will be supported in principle; and (ii) other land used for employment purposes shall be protected for ongoing employment use, unless such use is convincingly demonstrated to be unviable.
2) The ongoing regeneration at Brantham and at the Former Sproughton Sugar Beet Factory regeneration sites is supported. Development at the Brantham site must be sensitive to the estuarine/coastal location, which is in close proximity to the AONB, in relation to landscape, biodiversity, potentially flood risk, and, where relevant, the historic environment. This site could offer significant potential for biodiversity net gain as well as landscape enhancements to reflect its location close to the AONB and coast. Similarly, regeneration at the Former Sproughton Sugar Beet Factory, must be sensitive to landscape, biodiversity (with consideration given to potential for biodiversity net gain) and heritage assets.
3) Where appropriate, conditions will be applied to Use Class E developments to control the uses which can be operated.
4) In determining applications for new employment development weight shall be given to proposals which make provision for skills and training packages which are supported by the relevant LPA.
5) To ensure a deliverable supply of employment sites to accommodate the changing needs of the economy, development of other land for employment uses along the strategic transport corridors (as defined in the glossary) shall be supported in principle, subject to:
    a. The applicant demonstrating that any proposal is deliverable and would enhance provision which cannot be accommodated on existing strategic employment sites;
    b. All proposals demonstrating adequate highway capacity and access with sufficient on-site parking;
    c. Ensuring provision of accessibility to public transport, including walking and cycling provision;
    d. The site design and layout being sensitive to the surroundings, including any landscape, heritage and biodiversity assets;
    e. Prioritisation being given to development on previously development land; and
    f. All new buildings demonstrating a high standard of design, by having regard to the relevant policies of the Plan.
6) Any application for non-domestic proposals requiring heavy water usage across the two Districts will be required to demonstrate that sufficient water capacity is available through a Water Supply Management Statement in liaison with the relevant water supply company. Any use of this nature in the Hartismere Water Resource Zone (Mid Suffolk District) will be prohibited until confirmation of sufficient water capacity by the relevant water supply company (currently anticipated from 2032).

Supporting text for Policy SP05: Employment Land

Economic

Economic Growth

10.01 Across Babergh and Mid Suffolk there is a diverse network of employment sites of different sizes and locations with wide ranging suitability for different employment uses. The sites include large strategic sites which are concentrated along the transport corridors and on the edge of the towns, as well as smaller scale business estates and many other sites located throughout the Plan area, many of which are on diversified farmland. It is important that the diversity of sites is maintained to accommodate the wide-ranging requirements of employers and industries located in the Districts.

10.02 The Employment Land Needs Assessment (2016) identifies that Babergh and Mid Suffolk have modest net additional employment land requirements equating to approximately 2.9 Ha in Babergh and 9.4 Ha in Mid Suffolk, up to 2036. In quantitative terms, there is considered to be adequate land supply through vacant land (20.1 Ha in Babergh and 109.8 Ha in Mid Suffolk) on strategic employment sites to meet the additional employment land requirements over the Plan period. In addition to the designated sites in Table 6, there are further employment sites which have been granted planning permission along the strategic transport corridors (as defined in the glossary).

10.03 Whilst the baseline land forecast indicates modest employment land requirements, it is important that there is sufficient policy flexibility to meet sustainable economic demands over the Plan period. At the same time, it is also important to continue to support the retention and improvement of the network of established sites of varying sizes located across the Districts. Flexibility to accommodate net growth, to enhance the employment provision for uses that cannot be accommodated upon the existing strategic employment sites, is important to securing the future prosperity of the area.

10.04 In total, the strategic employment sites cover approximately 190 Ha in Babergh and 440 Ha in Mid Suffolk, as shown in Table 6. In Babergh, there are two key regeneration sites in employment use. One is at Brantham located on the Stour Estuary, and one is at Sproughton (the former Sugar Beet site) located on the A14 corridor, the latter also being a strategic employment site.

Table 6: Strategic Employment Sites and Gross* Areas

Site No.	Site Name	Total Site Area (Ha)	Vacant Land (Ha) (as at Nov 2022)
	Babergh		
1	Acton – Bull Lane	11.8	0
2	Hadleigh – Lady Lane	22.9	0.5
3	Raydon – Notley Enterprise Park	11.2	0
4	Sproughton – Farthing Road	20.9	0
5	Sproughton Former Sugar Beet Factory	35.5	17.2
6	Sudbury – Chilton Industrial Estate, Delphi Site, Church Field Road and Northern Road	69.8	2.4
7	Sudbury – Wood Hall Business Park	9.4	0
8	Wherstead Business Park	7.2	0
Babergh Sub-Total		188.7	20.1

Site No.	Site Name	Total Site Area (Ha)	Vacant Land (Ha) (as at Nov 2022)
Mid Suffolk			
9	Eye Airfield	140.8	11.0
10	Great Blakenham – Gipping and Claydon Business Park	44.2	0
11	Needham Market – Lion Barn	17.4	3.4
12	Stowmarket – Charles industrial Estate	2.2	0
13	Stowmarket – Gipping Employment Corridor	111.9	4.1
14	Stowmarket – Mill Lane / Gateway 14	79.3	79.3
15	Woolpit – Brickworks	4.4	0
16	Woolpit Business Park	10.7	2.3
17	Woolpit – Lady's Well	11.8	1.5
18	Woolpit – Lawn Farm	17.1	8.2
Mid Suffolk Sub-Total		439.8	109.8
Total		628.5	129.9

* Gross includes developable areas for employment uses as well as areas of constraint such as access roads, landscaping, and areas of flood risk.

10.05 It is important that the flexibility to enable economic investment is balanced with the need to safeguard and encourage investment and improvements to the existing network of employment sites, which have a central role in supporting economic activity across Babergh and Mid Suffolk. Proposals for net additional (new) employment land should enhance the economic potential of the Districts and not jeopardise the ongoing retention of the existing employment uses. There is a need to ensure that employment opportunities exist throughout the Districts, to help to support sustainable communities and reduce the need for out-commuting. The economic importance of supporting the retention of existing sites across the Districts remains vital to the ongoing economic sustainability of many settlements. Cumulatively these sites support the economic sustainability of Babergh and Mid Suffolk. Detailed policies to secure the diversity in the type, scale and location of employment sites are set out in the Non-Strategic Local Policies of the Plan.

10.06 Through the production of the Water Cycle Study, Essex and Suffolk Water commented that the supply headroom in the Hartismere Water Resource Zone (WRZ) has now been exhausted by new non-household demand and so this would affect future non-household development. It has been identified that additional supply capacity will not be available before 2032 at the earliest.

Policy LP25: Energy Sources, Storage and Distribution

Policy LP25 - Energy Sources, Storage and Distribution

1. Renewable and low carbon, decentralised and community energy generating proposals will be supported subject to:
   a. The impact on (but not limited to) landscape, highway safety, ecology, heritage, residential amenity, drainage, airfield safeguarding and the local community having been fully taken into consideration and where appropriate, effectively mitigated;
   b. Where renewable or low carbon energy designs are to be incorporated within a development, an integrated approach being taken, using technology that is suitable for the location and designed to maximise operational efficiency without comprising amenity;
   c. The impact of on and off-site power generation infrastructure[36] being acceptable, having regard to other policies in this Plan;
   d. The provision of mitigation, enhancement and compensation measures when necessary; and
   e. Approval of connection rights, and capacity in the UK power network, to be demonstrated as part of the planning application (where applicable).

2. The relevant LPA will normally use conditions attached to planning consents for energy development schemes to ensure the site is restored when energy generation ceases or becomes non-functioning for a period of six months.

3. Where proposals for renewable and low carbon energy impact on nature conservation sites[37], the Areas of Outstanding Natural Beauty, or the setting of heritage assets (including conservation areas), the applicant must be able to convincingly demonstrate that potential harm resultant from development can be effectively mitigated and that there are no alternative sites available within the District or for community initiatives within the area which it is intended to serve. This includes providing underground power lines and cabling.

[36] Generation infrastructure includes over-head cables, cable runs, invertors, control buildings, security fencing and highway access points.
[37] Nature conservation sites include : SSSI, SAC, SPA, NNR, Ramsar Sites, and Local Nature Reserves

Supporting text for Policy LP25: Energy Sources, Storage and Distribution

LP25 - Energy Sources, Storage and Distribution

Policy background and explanation

15.53 The NPPF proposes that 'the planning system should support the transition to a low carbon future in a changing climate'. Paragraph 156 of the NPPF states that Local Planning Authorities should support community-led initiatives for renewable and low carbon energy.

15.54 The policy on Energy Sources, Storage and Distribution is aimed at encouraging and facilitating the development of renewable and low carbon energy in the Babergh and Mid Suffolk Districts. This is in line with national policy stating that planning plays a key role in helping shape places to secure radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, as well as supporting the delivery of renewable and low carbon energy and associated infrastructure. This is central to the economic, social and environmental dimensions of sustainable development.

15.55 The Plan supports proposals for renewable and low carbon energy development providing that any identified potential harm on Special Protection Areas, Special Areas of Conservation, Sites of Special Scientific Interest, AONB designations or Local Wildlife Designations can be effectively mitigated.

15.56 The Plan seeks to support proposals for low carbon energy systems especially where networks can be expanded to accommodate new and existing developments over time. Networks could include, for example, specifically designed Combined Heat and Power systems (CHP) linked to district heating networks or utilising existing waste heat from industrial uses/ existing power stations through a district heating network. These types of systems represent a particularly efficient use of energy and should be considered by developers in new proposals.

15.57 The potential for new standalone technologies has not been investigated within the Districts however, there may be interest in developing suitable schemes in the area. The Plan seeks to support proposals which are appropriate in scale, design and location.

Policy LP29: Safe, Sustainable and Active Transport

Policy LP29 - Safe, Sustainable and Active Transport

1) **All developments will be required to demonstrate safe and suitable access for all and must prioritise sustainable and active transport and maximise the opportunities to utilise these modes in accordance with the transport hierarchy. Where possible, active travel is to be tied in with the green infrastructure network to support net environmental gains.**
2) **Development will be expected to contribute to the delivery of sustainable transport strategies for managing the cumulative impacts of growth, whilst protecting and enhancing the Public Rights of Way network.**
3) **All development should be informed by the relevant parking guidance[40], with adequate access for servicing and emergency vehicles.**
4) **Where necessary, development will be expected to provide home to school transport contributions.**
5) **Development proposals that are expected to, or likely to cause a significant increase in transport movements must:**
    a) **Be supported by a transport statement and if appropriate a transport assessment[41]; and**
    b) **Provide a travel plan informed by the relevant County[42] / National Guidance to mitigate the highway impact of development and maximise sustainable transport modes.**
6) **Significant impacts on highway safety or the function of the highway network must be mitigated. Impact on highway safety must not be unacceptable and the residual cumulative impacts on the road network must not be severe.**

[40] Currently the Suffolk Guidance for Parking (updated May 2019)
[41] Indicative thresholds: a transport statement will be required for residential developments between 50 and 80 dwellings and a transport assessment should accompany residential developments of over 80 dwellings, however other circumstances will also be considered. Non-residential development will be considered on a case by case basis. The scope of transport statements and assessments should extend across administrative boundaries of the LPA where it is appropriate to do so.
[42] https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/travel-plans/

Supporting text for Policy LP29: Safe, Sustainable and Active Transport

LP29 - Safe, Sustainable and Active Transport

Policy background and explanation

16.09 This policy has aims to ensure accessibility for all and to deliver sustainable development. It also seeks to provide a suitable policy framework for more detailed considerations of planning around transport and accessibility.

16.10 The National Planning Policy Framework states that developments that will generate significant amounts of traffic should provide a travel plan, to set out measures to facilitate sustainable modes of transport. SCC have produced new guidance for Travel Plans, for use as a material planning consideration. Furthermore, the National Planning Policy Framework, paragraph 34 states that:- 'Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure).'

16.11 With regards to home to school transport contributions, these are already being secured through the planning process, where relevant to the development. This is done in accordance with the Department for Education (DfE) publication 'Securing developer contributions for education' (April 2019), which should be read in conjunction with the Planning Practice Guidance (PPG) advice on planning obligations (revised March 2019). It is therefore appropriate for the policy to require development contributions to provide for home to school transport where necessary.

16.12 The health benefits of 'Active Transport' are widely understood and supported, as such Sport England have published 'Active Design' which seeks to promote sport and physical activity in new and existing developments, to create an active environment, through designing and adapting where we live to encourage activity in everyday lives. The Councils have also published a Local Cycling and Walking Infrastructure Plan (LCWIP), which identifies opportunities for cycling and walking improvements at a local level.

16.13 Development should have regard to the most recent County Council Rights of Way Improvement Plan.

Suffolk County Council

Babergh Mid Suffolk District Working Together



East Pye Solar EIA Scoping

Comments of Suffolk County Council and Mid Suffolk District Council

Appendix F: Extracts from East Suffolk Council's Waveney Local Plan

Policy WLP8.21: Sustainable Transport

Policy WLP8.21 – Sustainable Transport

Development proposals should be designed from the outset to incorporate measures that will encourage people to travel using non-car modes to access home, school, employment, services and facilities.

Development will be supported where:

- It is proportionate in scale to the existing transport network;
- It is located close to, and provides safe pedestrian and cycle access to services, facilities and public transport;
- It is well integrated into and enhances the existing cycle network including the safe design and layout of new routes and provision of covered, secure cycle parking;
- It is well integrated into, protects and enhances the existing pedestrian routes and the public rights of way network;
- It reduces conflict between users of the transport network including pedestrians, cyclists, users of mobility vehicles and drivers and does not reduce road safety;
- It will improve public transport in the rural areas of the District;
- It includes facilities for charging plug-in and other ultra-low emission vehicles; and
- The cumulative impact of new development will not create severe impacts on the transport network.

Developments should connect into the existing pedestrian and cycle network. Where possible, proposals are to include measures set out in the Waveney Cycle Strategy (2016 and subsequent updates) and demonstrate they have considered how the scheme will encourage people to walk and cycle to access services and facilities where practical.

Subject to design considerations under Policies WLP8.29, WLP8.30 and WLP8.31, new developments will be required to provide parking that meets the requirements set out in the Suffolk Guidance for Parking issued by Suffolk County Council (2014 and subsequent updates).

In consultation with the Highway Authority, the scale, location and nature of development will be considered in determining how the transport impacts of development should be assessed. As indicative thresholds, Transport Statements will be required for residential developments between 50-80 dwellings. Transport Assessments and Travel Plans will be required for residential developments larger than 80 dwellings. Non-residential development will be considered on a case by case basis.

Supporting text for Policy WLP8.21: Sustainable Transport

Sustainable Transport

8.110 In Waveney, the car is the most used method to travel to and from work. Cycling levels are above average for the county and walking is also popular. Bus and train use is below county and national averages.

8.111 The Suffolk Local Transport Plan 2011-2031 sets out a priority to support the growth of businesses, reducing the demand for car travel, making efficient use of transport networks and improving infrastructure.

8.112 The Waveney Local Plan: Suffolk County Transport Model (SCTM) - Preferred Option Traffic Forecasting Report (2018) identified that a number of junctions within the District, particularly in south Lowestoft would be close to capacity by 2036 and would therefore increase congestion.

8.113 Active travel such as walking and cycling positively contributes to public health and reduces the reliance on private vehicles. To encourage people to walk and cycle for convenience and enjoyment it is important that routes are delivered so they are direct, well connected to key local destinations and easy to follow. The Suffolk Walking Strategy (2015) and the Waveney Cycle Strategy (2016) set out the value and benefit of these activities, how existing provision can be improved to encourage greater participation and making use of opportunities afforded by a quality public realm and public right of way network. Delivery of these strategies will be critical in mitigating the impacts of congestion.

8.114 The Public Rights of Way Network has an important role in delivering sustainable development. The network provides a means of encouraging physical activity, providing access to the natural environment, supporting tourism, reducing travel by vehicular modes, reducing carbon emissions and (where relevant) aiding recreational avoidance of sensitive sites.

8.115 Policy WLP8.21 sets out requirements which should help improve the use of sustainable transport options and reduce the risk of congestion. The policy sets out basic principles for encouraging sustainable modes of transport. It also requires developers to have regard to the Waveney Cycle Strategy and subsequent updates.

8.116 Parking provision in new developments can have an impact on the use of private cars and also the success of the development. Suffolk County Council has published parking provision guidance and Policy WLP8.21 requires this guidance to be taken into account. To support the use of low emission vehicles, electric vehicle charging points are to be provided in accordance with the standards set out in the Suffolk Guidance for Parking published by Suffolk County Council and subsequent updates. Due to the potential increase in the use of electric vehicles developers are encouraged to provide each house with on plot parking with at least one electrical charging point accessible from either the driveway or garage. For houses with communal parking, flats and other developments, developers are encouraged to provide ducting and electricity supply to each car parking space to enable the installation of a charging point in the future.

8.117 Large scale developments can have significant impacts on local transport networks. The National Planning Policy Framework states that for developments which are likely to generate significant new movements, Transport Assessments and Travel Plans or Transport Statements should be prepared. Transport Assessments and Statements assess the potential transport impacts of developments and identify mitigation measures to promote sustainable development. Transport Assessments are thorough assessments of the transport implications of development, and Transport Statements are a less detailed evaluation to be used where this would be more proportionate to the potential impact of the

development. Travel Plans are long-term management strategies for encouraging sustainable transport and mitigating the traffic impacts of a development. Suffolk County Council as the Highway Authority can provide advice on the scope and content of Transport Statements, Assessments and Travel Plans. Given the potential impacts of traffic on European protected habitats, particularly the Broads Special Area for Conservation, Transport Assessments should evaluate the potential increase in traffic on streets within 400m of protected sites. Where vehicle movements are likely to significantly increase in these locations, further assessment on air quality and impact on habitats will be required to inform project level Habitat Regulations Assessments.

Policy WLP8.27: Renewable and Low Carbon Energy

Policy WLP8.27 – Renewable and Low Carbon Energy

The Council will support Neighbourhood Plans in identifying suitable areas for renewable and low carbon energy development.

Renewable and low carbon energy schemes, including wind energy schemes, will be permitted where the proposal is in a suitable area for renewable and low carbon energy as identified in a Neighbourhood Plan.

Renewable and low carbon energy schemes, with the exception of wind energy schemes, will also be permitted where there are no significant adverse effects on the amenities of nearby properties or businesses, there are no adverse safety impacts and no significant adverse effects on the transport network.

Cumulative effects and the impact of ancillary infrastructure will form part of the assessment for planning applications for renewable and low carbon energy developments.

When the technology is no longer operational there is a requirement to decommission, remove the facility and complete a restoration of the site to its original condition.

Supporting text for Policy WLP8.27: Renewable and Low Carbon Energy

Renewable and Low Carbon Energy

8.156 Planning plays a key role in reducing greenhouse gas emissions. One way in which planning can achieve this is by being supportive of well conceived renewable energy developments. Waveney is already home to a number of renewable energy and low carbon developments, including wind turbines in Lowestoft, Kessingland and Holton, solar farms around Ellough and an anaerobic digester in Ellough.

8.157 The National Planning Policy Framework requires local plans to develop a positive strategy to promote energy from renewable and low carbon sources. The Framework encourages local plans to maximise renewable and low carbon energy development, consider identifying suitable areas for development and support community-led initiatives for renewable and low carbon energy. A written ministerial statement (18 June 2015) adds further to national policy with respect to wind farms which states that wind energy development should only be permitted if the site is in an area identified as suitable for wind energy development in a Local Plan or Neighbourhood Plan, and following consultation, it can be demonstrated that the planning impacts identified by affected local communities have been fully addressed and therefore the proposal has their backing.

8.158 Not all renewable energy and low carbon developments within Waveney are determined by Waveney District Council as the local planning authority. The Council is only responsible for renewable and low carbon energy development of 50 megawatts or less installed capacity.

8.159 Whilst the Council is keen to support renewable energy developments, it is aware that these developments can have significant negative effects on the environment, including design, heritage, biodiversity and landscape. Therefore proposals for renewable energy will be considered against Policies WLP8.29, WLP8.34, WLP8.35, WLP8.36, WLP8.37, WLP8.38 and WLP8.39. The impact of renewable energy developments can extend to neighbouring Districts and the Broads Authority and consideration may be required of neighbouring landscape character and Local Plans. Renewable and low carbon energy developments can also have an affect on amenity of residents, visitors and workers nearby through noise, smell, shadow flicker and glare. Developments can also cause safety issues, such as distraction of drivers and equipment failure. The National Planning Practice Guidance gives a full range of considerations for different types of renewable and low carbon technology. The Council will use this when determining applications for renewable and low carbon energy development.

8.160 The Government places great emphasis on local people being in control of delivering renewable and low carbon energy developments. The Council therefore believes that Neighbourhood Plans are best placed to identify suitable areas for renewable and low carbon energy projects. As Neighbourhood Plans have to go through a referendum, this is a key way of demonstrating local support and commitment to a local renewable and low carbon energy project. Suitable areas identified in Neighbourhood Plans will need to be in conformity with all of the policies of this Local Plan, but particularly Policies WLP8.29, WLP8.34, WLP8.35, WLP8.36, WLP8.37, WLP8.38 and WLP8.39 on design, biodiversity, the landscape and the historic environment.

Appendix 6

Suggested amendments to BEPS 3 Page doc: "Proposed Scope of the East Pye Solar EIA"

I suggested some text changes to the full BEPS Environmental Impact Assessment (EIA) Scoping Report in regard to references to lighting impacts and impacts on rural tranquillity. Annetta Berry is incorporating these changes in to this document although they are not included in the version you received via Email. In order for the 3 page Proposed Scope document to be consistent with the re-worded longer report the following references to lighting need to be re-worded:

1) "Impacts of any lighting, including temporary lighting on wildlife and communities should be scoped in"

Replace with: "Impacts of any lighting employed during the construction phase, on flora, fauna, dark skies, dark landscapes and residential amenity should be scoped in" *(*)*

Reason for the change – light pollution concerns extend beyond impacts on ecology and all the negative consequences of introducing artificial light in to an area of rural dark landscape need to be fully assessed.

2) "Impacts of permanent motion-sensor lighting on wildlife and communities should be scoped in"

Replace with: "Impacts of any lighting employed during the 40 to 60 years operational period, on flora, fauna, dark skies, dark landscapes and residential amenity should be scoped in"

Reasons for the change – A) as for 1) above (*) and B) In light pollution terminology the use of the phrase permanent lighting usually refers to the employment of dusk to dawn lights. Light pollution campaigners advise that, when lighting is deemed necessary as part of a development, motion-sensor lights are used rather than permanent night time dusk to dawn lighting. We don't want to give the impression that dusk to dawn lights would be acceptable.

I also suggest that impacts on users of PROW is scoped in as an entirely separate topic. These impacts will be huge and an initial study shows that over 22km of PROW will have solar fields along one side or both sides and many more sections of footpaths will have views ruined by the presence of solar panels and the associated infrastructure. I advise each parish council to identify one or more viewpoints from footpaths where the visual impact would be substantial and to ask for the production of photomontages from these locations to be scoped in for inclusion in the ES.

And finally in addition to requesting that cumulative impacts resulting from this scheme together with other renewable projects in the wider area (both built and proposed) are scoped in there is a case for the impacts resulting from the sheer size of the East Pye scheme to be scoped in as a separate topic. No mega solar farm has yet been built in the UK and therefore the overall impact of all the various aspects of this kind of project has yet to be observed. The sum total of all impacts (on PROW, ecology, landscape, etc) over a large area of countryside really should be scoped in and assessed – these combined impacts cannot be covered under individual subject headings.

David Hook (Chairman – Hempnall Parish Council)

Advice from the planning officers at SNC (Claire Curtis) and NCC (Stephen Faulkner) overseeing NSIP projects on what to include in a scoping response

Both advised that responses should be limited to stating which topics should be scoped in that are not already in the list. This can of course include a request to scope in topics that East Pye want scoped out.

As well as identifying a topic / issue to be scoped in Claire and Stephen said it was important to provide a brief explanation as to why you want this topic covered.

Below are 2 examples of how you could phrase your responses – I have chosen Lighting and rural Tranquillity as these are topics on which I have done a considerable amount of work for CPRE both nationally and locally.

Lighting should be scoped in as a separate topic because most of the countryside covered by these proposals is located in an area of Rural Dark Landscape as defined in Norfolk County Council's Environmental Lighting Zones Policy. Residents and visitors alike appreciate the local rural dark landscape and dark skies. The impact of any form of night-time artificial lighting on these treasured assets, ecology and residential amenity needs to be fully assessed.

The impact on Rural Tranquillity should be scoped in as a separate topic because most of the countryside covered by these proposals is defined on the CPRE Tranquillity Map of England as "Most Tranquil" and East Pye admit that: *"this is an undeveloped area with a valued sense of remoteness and tranquillity. It has stayed historically intact and unspoilt because it avoided the effects of the Industrial Revolution."* It is important that these few remaining untouched areas of rural England should be protected from development to preserve their integrity for future generations. The vast scale of this scheme and the distances it stretches across the landscape, some 15 KM, would have a significant impact on the area's *"valued sense of remoteness and tranquillity"* and these aspects should be scoped into the Environmental Impact Assessment.

NB Tranquillity is not just about an absence of noise it also covers an absence of artificial structures, lighting etc.

David Hook (Chairman – Hempnall Parish Council)

Appendix 6

Tivetshall Parish Council South Norfolk – 6th February 2025

Response to Planning Inspectorate on the

Environmental Impact Assessment for East Pye Solar

The Parish Council has consulted with residents and also referenced the Tivetshall Neighbourhood Plan which was adopted in December 2022. References are made to the Neighbourhood Plan throughout this response.

Areas East Pye Solar have requested to scope out the following categories:

- Air Quality
- Water Environment -
- Major Accidents and Disasters
- Electric, Magnetic and Electromagnetic Fields
- Telecommunications, Television Reception and Utilities
- Wind Microclimate
- Daylight, Sunlight and Overshadowing
- Glint and Glare
- Lighting
- Waste and Materials
- Socio-Economics
- Human Health
- Arboriculture; and
- Ground Conditions

It is notable that, contrary to what East Pye Solar claim, all these aspects pose significant impacts, which are either extremely challenging to mitigate or which question the viability of the entire project. We call for these areas to be scoped into the Environmental Impact Assessment, with our reasons outlined below.

East Pye Solar also propose to scope out subsections of categories that would be otherwise included in the Environmental Impact Statement. Again, this appears to be because they pose significant impacts that are impossible to mitigate, and they are therefore hoping not to address them publicly in detail.
The applicant should justify how this is considered to be one NSIP project
1 Ibid, 5.1.1, pg. 96

Water Environment should be scoped in.

During the preparation of **Tivetshall Neighbourhood Plan** there were areas of the parish that experienced significant flooding and surface water drainage issues. **Station Road** in close proximity to the EPS proposed access road for Sites 1 and 2. **Lodge Road** and including damage to private properties. **Station Road** further east and south of **Site 2**.

Detailed plans should be submitted of the proposed mitigation for each affected residence. If screening by native hedges/tress is proposed, it would take a decade to grow tall enough to have any effect. Therefore, there needs to be a proper assessment of the interim impact of glint and glare on affected homes until any 'native species' screening is effective.

As it is proposed that native hedging/trees will be used for screening purposes, there will be at least a decade until such new plantings reach a height adequate to screen infrastructure that is either 4.5 or 3.5m high.

Contamination/damage to soil should be scoped in. Effectiveness of Environmental Mitigation should be scoped in. Mitigation proposals should be created for all endangered species recorded at all sites, both in desk-based and on-site surveys. Peer-reviewed evidence should be supplied that proposed mitigations are effective How will they address levels of uncertainty? How will they meet the costs of ongoing monitoring and data collection to check mitigation is effective? How will they address issues of ineffective mitigation? How will they guarantee that measures proposed as mitigation to address the environmental impacts development are implemented as originally proposed? How will mitigation measures be enforced? How will funds be attached for this purpose to the project if the shell company dissolves?

EPS state: 'The land within the Scheme will be restored and returned to its original use as far as reasonably practicable after decommissioning. This will include removal of the solar PV panels, substations, conversion units and BESS.'
As this is BMV agricultural land, it should be guaranteed that the land should be returned as agricultural land of the same or better quality at decommissioning. This is supposedly the reason these schemes and land use can be categories as 'agricultural' rather than industrial - that they improve soil quality and biodiversity, not permanently damage good agricultural land.
Compression, contamination estimates during construction and decommissioning for each site and specific equipment to be installed on that site should be provided.
Site/soil specific depth of compression at each site should be provided. Evidence from other sites with that specific type of equipment/soil.
Modelling of time for soil to recover from compression should be provided.
Modelling of long-term impacts to different grades of BMV soil should be provided.
Modelling and evidence of time for soil to recover homogeneity after decommissioning should be provided.
Length of time for soil to return to previous agricultural grade after decommissioning should be provided. Guarantee of return of soil to at least previous BMV grade should be provided.
Quantity, locations and contamination impact of cement/concrete on soil should be provided.

Waste and Materials should also be scoped in to demonstrate how and where damaged panels will be recycled, and how all equipment will be recycled at the end of its lifespan. Chinese panels should not be used for this project if they contain PFAS and are unable to be recycled in the UK. It is particularly important to know. How will unrecyclable materials such as PFAS (forever chemicals) be dealt with. Figures in the EIA to calculate waste production are currently incorrect by a factor of two.

Estimates of breakage of panels on transit and installation should be provided.
Breakage of panels due to weather events- storms, hail, debris falling on to panels, bird strikes should be addressed
PFOS/PFAS from underground cables. Long term impacts of leaving them in the soil should be addressed

Materials of metal mountings, method and depth of installation, leeching/weathering impacts on soil should be provided for each specific site.
Leeching reports for all equipment/materials to be installed should be provided.
Contamination implications of weathering, microcracking and damage to panels on soil contamination should be provided.
Weathering and deterioration impacts of other equipment on soil should be provided.

Impact of decommissioning on any Biodiversity Net Gain should be scoped in
How will all land will be decontaminated and returned either to its former agricultural grade or an improved grade once the project is decommissioned. Modelling of soil contaminants from site, specifically lead and PFAS, on future crop growth. Impact on the soil beneath the panels if the minimum height is 0.4m.
Sheep will be unable to graze beneath panels, how will the soil therefore regenerate? There will not be improvements to soil quality on these areas.
Details of vegetation management plan including spraying and their impacts should be scoped in. Sheep will not be able to graze beneath panels if height is 0.4m. Use of pesticides will have a negative affect on biodiversity and surface water run off .
New internal access tracks are likely to be a maximum of 6m wide, constructed of hardcore or gravel over a levelling layer of substrate.' How do they propose to decontaminate this land and return it to agricultural use?

Access There is insufficient consideration for building new roads on sites capable of carrying and turning articulated lorries and storage of materials. Also, there is an unrealistic understanding of the potential for access from minor country roads without damaging verges. The access along a current farm track off Station Road is in an area already known for vehicle accidents including one fatal.

The impact of decommissioning and return to agriculture on any BNG gain during operation should be scoped in. Will any biodiversity net gain remain after decommissioning?

Tivetshall Parish Council
6th February 2025

Stephen Asbey
Cherry Tree Barn
Tivetshall St Margaret
Norfolk
NR15 2AX

February 6th, 2025

Dear Sirs,

Thank you for supporting the campaign to block East Pye Solar Fam. We in Lodge Road feel strongly that it is going to affect our enjoyment of our homes as the proposal is very close and, in some cases, less than 100 yards from our property.

We have very few facilities here but appreciate the peace and quiet of our home and quiet lanes and footpaths. The proposed solar farm would span multiple fields and meadows, potentially disrupting local ecosystems and altering the rural character of the area. The installation of extensive solar panels would harm wildlife habitats and diminish the natural beauty of this wonderful countryside.
The Battery site is not far from us as the crow flies and we are very concerned about the potential declines in property values, as well as the negative effects on local businesses, and overall disruption to our way of life.
Noise is audible from the sites and we understand there needs to be a substation for every 100 yards of solar panels There are so many alternatives to this destructive proposal, and we are very concerned that there has been a lack of adequate consultation and transparency from the developers. The project is being advanced without fully considering local opinions and concerns.

The project would occupy approximately 2,700 acres of productive farmland. Converting this land for solar energy would undermine food security by reducing areas available for agriculture. These fields are grade 2 land producing excellent essential crops and the solar could be put on the cable run fields yet the farmers there have only been offered the cable run. Illogical and not cost effective. Large-scale solar projects should prioritise non-agricultural sites, such as rooftops, car parks, or brownfield areas, to avoid compromising valuable farmland and to minimize impact on rural communities.

Again, many thanks for your support at this most worrying of times.

Yours faithfully

[redacted]

Stephen & Donna Asbey, Suzanne & John Clarke, Elizabeth Rose & Joshua Simmonds
Residents of Lodge Road, Tivetshall St Margaret.

From:	[redacted]
To:	East Pye Solar
Cc:	[redacted]
Subject:	EN0110014 East Pye Solar - EIA Scoping Notification and Consultation
Date:	10 February 2025 16:20:35

Tasburgh Parish Council wish to submit the following comments they consider should be provided in the Environmental Statement and why:

Construction Traffic

The Parish Council have concerns that the poor rural traffic structure cannot cope with the amount of materials that will be transported to the site.

Glare

Direct sunlight could cause reflective glare for traffic on A140, and B1527 and properties within the area.

Environment/Wildlife

The Parish Council have concerns about the effect on existing wildlife habitat and we want assurances for the future that any negative effects will be mitigated.

Best wishes

Tina

Tina Eagle
Parish Clerk
Tel: 01508 494569
Email: [redacted]@btinternet.com
Website: https://tasburghpc.wixsite.com/tasburghpc Facebook

Please note that I work part-time and every effort will be made to respond to the preferred communication method for email enquiries within 3 working days

Your privacy and keeping your personal details safe is very important to us. Our Privacy Notice explains how we do this

UK Health Security Agency

Environmental Hazards and Emergencies Department
Seaton House, City Link
London Road
Nottingham, NG2 4LA

nsipconsultations@ukhsa.gov.uk
www.gov.uk/ukhsa

Your Ref: EN0110014
Our Ref: 91763 CIRIS

Mr Joseph Jones
EIA Advisor
The Planning Inspectorate
Operation Group 3
Temple Quay House
2 The Square
Bristol BS1 6PN

6th February 2025

Dear Mr Jones

Nationally Significant Infrastructure Project
East Pye Solar Project EN0110014
Scoping Consultation Stage

Thank you for including the UK Health Security Agency (UKHSA) in the scoping consultation phase of the above application. ***Please note that we request views from the Office for Health Improvement and Disparities (OHID) and the response provided below is sent on behalf of both UKHSA and OHID.*** The response is impartial and independent.

The health of an individual or a population is the result of a complex interaction of a wide range of different determinants of health, from an individual's genetic make-up to lifestyles and behaviours, and the communities, local economy, built and natural environments to global ecosystem trends. All developments will have some effect on the determinants of health, which in turn will influence the health and wellbeing of the general population, vulnerable groups and individual people. Although assessing impacts on health beyond direct effects from for example emissions to air or road traffic incidents is complex, there is a need to ensure a proportionate assessment focused on an application's significant effects.

Having considered the submitted scoping report we wish to make the following comments:

Environmental Public Health
We understand that the promoter will wish to avoid unnecessary duplication and that many issues including noise, contaminated land, accidents etc. will be covered elsewhere in the

Environmental Statement (ES), such that a separate Human Health section is scoped out. We believe the summation of relevant issues into a specific section of the report provides a focus which ensures that public health is given adequate consideration.

In terms of the level of detail to be included in an ES, we recognise that the differing nature of projects is such that their impacts will vary. UKHSA and OHID's predecessor organisation Public Health England produced an advice document *Advice on the content of Environmental Statements accompanying an application under the NSIP Regime*', setting out aspects to be addressed within the Environmental Statement[1]. This advice document and its recommendations are still valid and should be considered when preparing an ES. Please note that where impacts relating to health and/or further assessments are scoped out, promoters should fully explain and justify this within the submitted documentation.

Our position is that pollutants associated with road traffic or combustion, particularly particulate matter and oxides of nitrogen are non-threshold; i.e, an exposed population is likely to be subject to potential harm at any level and that reducing public exposure to non-threshold pollutants (such as particulate matter and nitrogen dioxide) below air quality standards will have potential public health benefits. We support approaches which minimise or mitigate public exposure to non-threshold air pollutants, address inequalities (in exposure) and maximise co-benefits (such as physical exercise). We encourage their consideration during development design, environmental and health impact assessment, and development consent.

For potential electromagnetic field (EMF) health impacts, UKHSA requests clarification for scoping the electrical infrastructure out from the ES if it is included in the ES under "Other Matters". Please refer to the following code of practice, which defines the criteria for demonstrating compliance with the public exposure guidelines, including the operational conditions for scoping out electrical infrastructure:
https://assets.publishing.service.gov.uk/media/5a796799ed915d07d35b5397/1256-code-practice-emf-public-exp-guidelines.pdf

More information is available in the advice document produced by Public Health England, a UKHSA predecessor body[1].

Human Health and Wellbeing - OHID

This section of OHIDs response, identifies the wider determinants of health and wellbeing we expect the Environmental Statement (ES) to demonstrate whether they are likely to give rise to significant effects. OHID has focused its approach on scoping determinants of health and

[1] https://khub.net/documents/135939561/390856715/Advice+on+the+content+of+environmental+statements+accompanying+an+application+under+the+Nationally+Significant+Infrastructure+Planning+Regime.pdf/a86b5521-46cc-98e4-4cad-f81a6c58f2e2?t=1615998516658

wellbeing under four themes, which have been derived from an analysis of the wider determinants of health mentioned in the National Policy Statements. The four themes are:

- Access
- Traffic and Transport
- Socioeconomic
- Land Use

Having considered the submitted scoping report OHID wish to make the following specific comments and recommendations:

Population and Human health assessment

It is noted that population and human health will be considered within existing chapters and not form a separate chapter within the ES. Given the current knowledge of the scheme and potential impacts this appears to be a proportionate approach but does ignore the potential for cumulative effects from the project or nearby schemes.

The report identifies that temporary portacabins will be provided on the site. They will accommodate the temporary construction workforce, in order to place no demand on tourist accommodation in the local area. No details are provided regarding the provision of water, sanitation, accommodation design and provision of food. Poorly designed and managed temporary accommodation may increase risk of communicable disease or water and food borne illness, thus increasing demand on local health care services.

The cumulative effects assessment should consider the potential for population and human health effects.

Scoping out a separate population and human health chapter should be kept under review as more information becomes available. A separate population and human health chapter may be justified as the assessments develop.

The environmental statement should provide sufficient detail regarding the location, design and management of the temporary accommodation, to reduce the risk of communicable disease or water and food borne illness.

Yours sincerely,

On behalf of UK Health Security Agency

Please mark any correspondence for the attention of National Infrastructure Planning Administration.

Suggested amendments to BEPS 3 Page doc: "Proposed Scope of the East Pye Solar EIA"

I suggested some text changes to the full BEPS Environmental Impact Assessment (EIA) Scoping Report in regard to references to lighting impacts and impacts on rural tranquillity. Annetta Berry is incorporating these changes in to this document although they are not included in the version you received via Email. In order for the 3 page Proposed Scope document to be consistent with the re-worded longer report the following references to lighting need to be re-worded:

1) "Impacts of any lighting, including temporary lighting on wildlife and communities should be scoped in"

Replace with: "Impacts of any lighting employed during the construction phase, on flora, fauna, dark skies, dark landscapes and residential amenity should be scoped in" *(*)*

Reason for the change – light pollution concerns extend beyond impacts on ecology and all the negative consequences of introducing artificial light in to an area of rural dark landscape need to be fully assessed.

2) "Impacts of permanent motion-sensor lighting on wildlife and communities should be scoped in"

Replace with: "Impacts of any lighting employed during the 40 to 60 years operational period, on flora, fauna, dark skies, dark landscapes and residential amenity should be scoped in"

Reasons for the change – A) as for 1) above (*) and B) In light pollution terminology the use of the phrase permanent lighting usually refers to the employment of dusk to dawn lights. Light pollution campaigners advise that, when lighting is deemed necessary as part of a development, motion-sensor lights are used rather than permanent night time dusk to dawn lighting. We don't want to give the impression that dusk to dawn lights would be acceptable.

I also suggest that impacts on users of PROW is scoped in as an entirely separate topic. These impacts will be huge and an initial study shows that over 22km of PROW will have solar fields along one side or both sides and many more sections of footpaths will have views ruined by the presence of solar panels and the associated infrastructure. I advise each parish council to identify one or more viewpoints from footpaths where the visual impact would be substantial and to ask for the production of photomontages from these locations to be scoped in for inclusion in the ES.

And finally in addition to requesting that cumulative impacts resulting from this scheme together with other renewable projects in the wider area (both built and proposed) are scoped in there is a case for the impacts resulting from the sheer size of the East Pye scheme to be scoped in as a separate topic. No mega solar farm has yet been built in the UK and therefore the overall impact of all the various aspects of this kind of project has yet to be observed. The sum total of all impacts (on PROW, ecology, landscape, etc) over a large area of countryside really should be scoped in and assessed – these combined impacts cannot be covered under individual subject headings.

David Hook (Chairman – Hempnall Parish Council)

Advice from the planning officers at SNC (Claire Curtis) and NCC (Stephen Faulkner) overseeing NSIP projects on what to include in a scoping response

Both advised that responses should be limited to stating which topics should be scoped in that are not already in the list. This can of course include a request to scope in topics that East Pye want scoped out.

As well as identifying a topic / issue to be scoped in Claire and Stephen said it was important to provide a brief explanation as to why you want this topic covered.

Below are 2 examples of how you could phrase your responses – I have chosen Lighting and rural Tranquillity as these are topics on which I have done a considerable amount of work for CPRE both nationally and locally.

Lighting should be scoped in as a separate topic because most of the countryside covered by these proposals is located in an area of Rural Dark Landscape as defined in Norfolk County Council's Environmental Lighting Zones Policy. Residents and visitors alike appreciate the local rural dark landscape and dark skies. The impact of any form of night-time artificial lighting on these treasured assets, ecology and residential amenity needs to be fully assessed.

The impact on Rural Tranquillity should be scoped in as a separate topic because most of the countryside covered by these proposals is defined on the CPRE Tranquillity Map of England as "Most Tranquil" and East Pye admit that: *"this is an undeveloped area with a valued sense of remoteness and tranquillity. It has stayed historically intact and unspoilt because it avoided the effects of the Industrial Revolution."* It is important that these few remaining untouched areas of rural England should be protected from development to preserve their integrity for future generations. The vast scale of this scheme and the distances it stretches across the landscape, some 15 KM, would have a significant impact on the area's *"valued sense of remoteness and tranquillity"* and these aspects should be scoped into the Environmental Impact Assessment.

NB Tranquillity is not just about an absence of noise it also covers an absence of artificial structures, lighting etc.

David Hook (Chairman – Hempnall Parish Council)

From: Woodton PC
To: East Pye Solar
Subject: Fwd: F.A.O Joseph Jones - Reference: EN0110014
Date: 06 February 2025 16:35:08

Good afternoon,

Thank you for inviting Woodton Parish Council to respond.

We welcome the areas already proposed by the applicant in its scoping report.

Given the sheer scale of this scheme, its spread across multiple rural communities and the impact it will have on both the landscape and public rights of way for generations to come; we consider the following categories should also be included in the Environmental Statement. These are:

- All categories the applicant has proposed be scoped out.
- The impact of lighting on wildlife and communities during the construction phase and lifetime of the scheme.
- The impact on rural tranquillity across the multiple site locations.
- The visual and viewpoint impacts on public rights of way.

Yours sincerely,

Yvonne Wonnacott
Parish Clerk to Woodton Parish Council
Tel: 01508 493134
Email: woodtonpc@gmail.com
Website: https://woodtonpc.wixsite.com/woodtonpc

Please note that I work part-time and am contracted for an average of 6 hours per week. The preferred communication method is email and I will endeavour to respond within 5 working days.
Your privacy and keeping your personal details safe is very important to us. Our Privacy Statement explains how we do this.