



SAXLINGHAM NETHERGATE PARISH COUNCIL

Clerk: Mrs J King
22 Henry Preston Road
Tasburgh
Norwich
NR15 1NU
Tel: (01508) 470759
e-mail: saxlinghamnethergatepc@gmail.com

11 February 2025

Planning Inspectorate
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: EN0110014

Dear Mr Jones,

**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**

In response to your letter dated 15 January 2025, Saxlingham Nethergate 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:

- Landscape & Visual
- Cultural Heritage
- 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.

Saxlingham Nethergate 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 15km, 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.

Saxlingham Nethergate 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 235 965 at the junction of Saxlingham Nethergate FP13 with Church Hill looking south eastwards across the fields towards Broaden Lane.
- 2) Grid Reference 247 958 at the junction of Saxlingham Nethergate FP27 with FP5 looking north west towards Saxlingham Green.
- 3) Grid Reference 238 958 at the junction of Saxlingham Nethergate FP12 with Broaden Lane looking north west towards the village.

If further clarification of the location of these viewpoints is required if requested a representative of Saxlingham Nethergate 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 Saxlingham Nethergate 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 culverts.” Saxlingham Nethergate 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.

Saxlingham Nethergate 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.

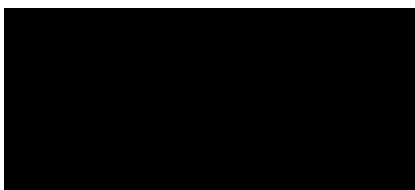
Justification for **the choice of this specific location for this scale of project** should also be scoped in.

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). Saxlingham Nethergate 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.

Yours sincerely,



Julie King
Parish Clerk