

I object to the East Pye Solar scheme as a whole as I believe that it will negatively impact the recognised nationally important, landscape-wide colonies of rare bats, especially barbastelles, in this area. I do not believe, from the evidence of their existing application, the applicant will be able to demonstrate no deterioration to conservation status in order to obtain European Protected Species Licences – the work they propose is exactly the type of activity identified as detrimental to these species in Natural England's own preferential conservation status advice and also in other peer-reviewed academic research.

Following the mitigation hierarchy, I submit that the clear evidence of very high numbers of rare bats including barbastelles across the entire order limits should have caused the applicant to avoid the whole area altogether and make a 'no development' decision – especially as they admit that their project is not required in T7 and in their own words is being promoted for 'optionality' and 'attrition'. Any generic 'benefits' do not outweigh the very significant harms caused in this specific location.

I am particularly concerned about site 3, which was developed specifically as bat habitat by the Norfolk Bat Group. They converted multiple underground WWII bomber bunkers into bat hibernacula around 30 years ago. (I will submit further evidence in my written representation.) These are now an important ecological resource and are home to exactly the species of bats which ecological research demonstrates are negatively impacted by the presence of solar panels. The construction work, artificial lighting, noise and vibrations along the edge of Spring Wood replanted ancient woodland where these bunkers are situated would have a significantly detrimental effect on the bats.

In light of Norfolk Wildlife Trust's recommendation both at Statutory Consultation and in their Relevant Representation, the identified importance of Site 3 to bats and the inadequacy of the present baseline and impact assessment, I request that if the whole EAST PYE SOLAR scheme is not rejected in total, then solar-generating and associated operational infrastructure should be removed from Site 3. The land should instead be retained within the Order limits and secured through the Works Plans, Requirements and Landscape and Ecological Management Plan as a permanent area of bat habitat protection, restoration and enhancement.

I respectfully ask the Examining Authority to require

- a response from the Applicant to Norfolk Wildlife Trust's recommendation, explaining whether it will remove solar development from Site 3;
- Natural England's express view on the proposed removal and mitigation use;
- a plan overlaying Site 3 with all bat records, roosts, predicted core sustenance zones, flight paths, hedgerows, woodland and water features;
- an assessment of Site 3's functional role the wider bat and barbastelle population;
- revised Works Plans excluding solar and associated infrastructure from Site 3;
- a binding requirement securing the land exclusively for ecological mitigation; - away from main sites - dark, no construction traffic.
- a detailed, funded and enforceable management and monitoring programme for the project's full operational life;
- a revised BNG calculation that does not present avoidance of harm as an additional biodiversity 'gain';
- an explanation of the effect of removing Site 3 on generating capacity, scheme need, land requirements and compulsory-acquisition powers.

There is clear precedent in solar NSIP examinations for removing development from environmentally sensitive land while retaining that land within the Order limits for protection and mitigation. In the Botley West Solar Farm examination, the applicant agreed, following Historic England's representations, to remove specified solar and associated works from sensitive fields, including field 1.13, while retaining the land as an archaeological protection and management area. This demonstrates that the exclusion of infrastructure need not require the complete removal of a site from the DCO: the Works Plans and Requirements can instead be amended to prohibit generating and associated operational infrastructure and to secure the land for mitigation.

I therefore request the equivalent treatment of Site 3 if the scheme is to be consented: solar panels, inverters, cabling compounds and other operational works should be removed, while the land should be retained and secured as a coherent area of permanent habitat protection, restoration and enhancement for barbastelles and other bats, in accordance with the mitigation hierarchy and Norfolk Wildlife Trust's recommendation.

AI disclosure: The majority of this statement is human-researched and written. The bullet-point list was drafted by AI from human research, for the purposes of clarity.

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