

Woodton Parish Council: Representation on Assessment Gaps and Outstanding Concerns Regarding the East Pye Solar Development Consent Order Application

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For: Woodton Parish Council

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1. Executive Summary

- 1.1.1 This representation on behalf of Woodton Parish Council identifies a series of apparent assessment gaps and unresolved issues within the East Pye Solar Development Consent Order (DCO) application, focusing principally on Site 7 and Site 10 in and around Woodton. The document does not seek to challenge the principle of renewable energy development but contends that important, localised impacts have either not been adequately assessed or have not been sufficiently evidenced within the submitted application documents.
- 1.1.2 Key Concerns at Site 7
- 1.1.3 The representation argues that the Applicant has not properly assessed the consequences of construction activity on the Springwood Lane community, a small cul-de-sac dependent upon Woodton Road and Shotesham Road for access. It contends that multiple proposed highway interventions—including temporary road closures, construction access points, traffic management measures and cable route works—have been assessed individually but not cumulatively. As a result, concerns remain regarding residential access, emergency service access, diversion routes and potential community severance.
- 1.1.4 A related concern is that the Applicant has focused on construction traffic volumes rather than the physical suitability of the local rural road network. The representation highlights the narrow carriageways, limited passing opportunities, roadside drainage ditches, blind bends and overhanging vegetation along Woodton Road and Shotesham Road. It argues that there is insufficient evidence that these roads can safely accommodate construction HGVs and that the absence of a comprehensive highway suitability assessment creates uncertainty regarding road safety, accessibility and severance impacts.
- 1.1.5 The document also raises concerns regarding an active family farming operation at Oaks Farm, where proposed highway works may affect agricultural access, livestock management, grazing land, hay production and farm infrastructure. It argues that the Applicant has not sufficiently demonstrated how these practical and economic impacts have been assessed or mitigated.
- 1.1.6 Further concerns relate to the nearby Grade II* listed Oaks Farmhouse. The representation argues that the Environmental Statement does not clearly demonstrate how the significance and setting of this highly designated heritage asset—including its relationship with the surrounding agricultural landscape—have been assessed. It also questions whether adequate landscape and visual assessment has been undertaken from the property itself.
- 1.1.7 The document additionally identifies a potential omission relating to an established microlight runway at Oaks Farm, which lies in close proximity to proposed solar infrastructure. It questions whether aviation impacts, including glint and glare effects,

construction disturbance, aviation safety considerations and emergency landing opportunities, have been properly assessed.

- 1.1.8 The representation further challenges the Applicant's land referencing exercise, arguing that the owners and occupiers of Oakdene Cottage, a property immediately adjacent to Site 7L, should potentially have been identified as Category 3 persons within the Book of Reference due to the possibility of impacts arising from the development.
- 1.1.9 Finally, the document questions whether claims regarding ecological connectivity improvements associated with the Shotesham–Woodton woodland network are supported by robust quantitative analysis. While habitat enhancement and biodiversity measures are acknowledged, the representation requests greater evidence demonstrating how ecological connectivity will be maintained and enhanced during both construction and operation.
- 1.1.10 Key Concerns at Site 10
- 1.1.11 At Site 10, the principal issue concerns the Applicant's proposed acquisition of permanent rights over Plot 06-008, which forms part of the active dairy farming enterprise at Old Hall Farm. The representation argues that the justification for acquiring permanent rights across the full extent of the plot has not been sufficiently demonstrated and that there is inadequate assessment of impacts on livestock management, farm operations, visitor facilities and the wider viability of the agricultural business.
- 1.1.12 The document also suggests that the Transport and Access assessment focuses primarily on traffic flows rather than the resilience of the road network serving Woodton village. It argues that the combined effects of simultaneous highway interventions on Norwich Road, Hempnall Road, Woodton Road, Shotesham Road and other local routes have not been assessed from the perspective of maintaining access to employment, healthcare, education and other essential services.
- 1.1.13 A final concern relates to Albion Nights, a rural tourism and accommodation business located adjacent to the proposed development. The representation argues that the business owner raised detailed, location-specific concerns about construction impacts, visitor experience, business viability and economic loss during consultation, yet does not appear to have been identified as a Category 3 person within the Book of Reference. The document therefore questions whether the Applicant's land referencing and diligent inquiry process was sufficiently comprehensive.
- 1.1.14 Overall Conclusion
- 1.1.15 The overarching contention of the representation is that the application contains a number of location-specific evidential gaps relating to transport, access, community severance, agricultural businesses, heritage assets, aviation activity, ecological connectivity and compulsory acquisition. The representation requests that the

Examining Authority seek further clarification from the Applicant and require additional evidence where necessary before concluding that the environmental effects and land acquisition powers associated with the East Pye Solar scheme have been fully justified and appropriately assessed.

2. Site 7

2.1. Failure to Consider Springwood Lane, Woodton Access Arrangements

2.1.1 The Applicant's Transport and Access assessment appears to have not fully considered the specific circumstances of Springwood Lane, Woodton, which functions as a cul-de-sac with highly limited access to the wider highway network.



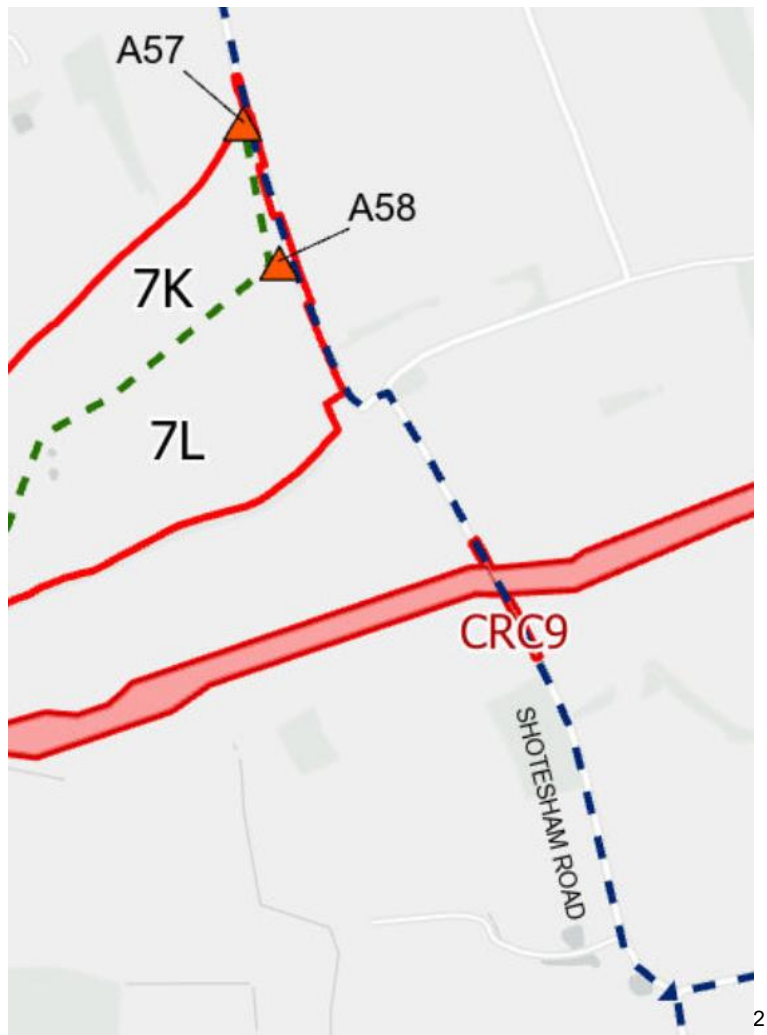
2.1.2 The Outline Construction Traffic Management Plan identifies both Shotesham Road and Woodton Road as highway links which will have significant street works, closures and alterations completed over the project timeline¹:

Type of Street work	Road	Description
Subject to works	Woodton Road	Between reference points 1A and 1B and shaded purple on sheet 1 of the street plans
Subject to works	Woodton Road	Between reference points 7C and 7D and shaded purple on sheet 7 of the streets plan
Subject to works	Woodton Road	Between reference points 7E and 7F and shaded

¹ East Pye Solar, 7.6 Outline Construction Traffic Management Plan – Revision 1, March 2026.

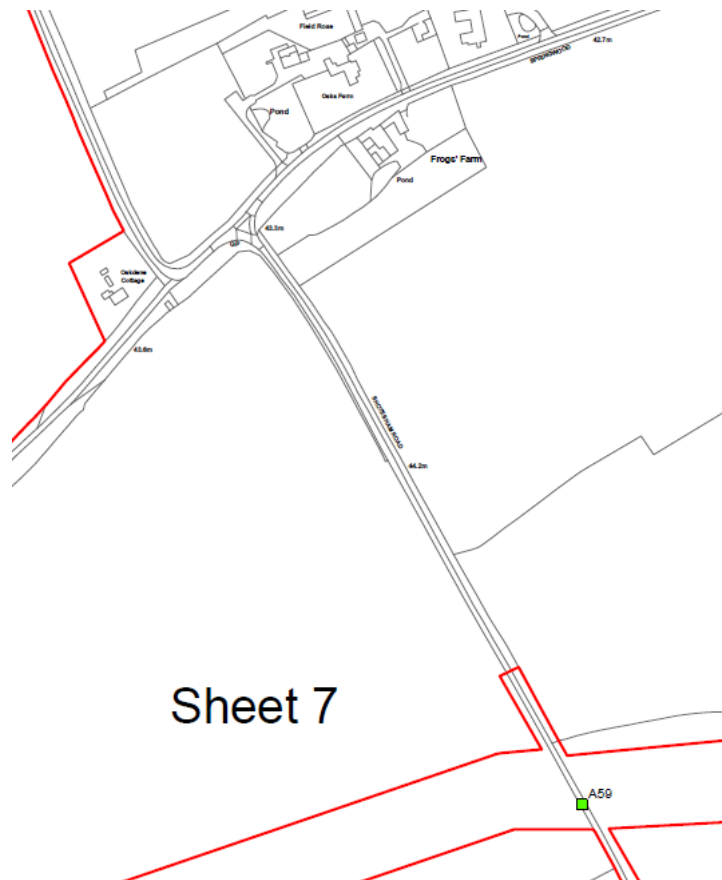
		purple on sheet 7 of the streets plan
Subject to works	Shotesham Road	Between reference points 6A and 6B and shaded purple on sheet 6 of the streets plan
Permanent Alteration	Woodton Road	Permanent alteration of layout between reference points 7C and 7B and shaded purple on sheet 7 of the streets plan
Permanent Alteration	Woodton Road	Permanent alteration of layout between reference points 7E and 7F and shaded purple on sheet 7 of the streets plan
Temporary Alteration	Shotesham Road	Temporary alteration of layout between reference points 6A and 6B and shaded purple of sheet 6 of the sheets plan
Temporarily Closed	Woodton Road	Approximately 179m of Woodton Road between points 1A and 1B on sheet 1 of the streets plan
Temporarily Closed	Woodton Road	Approximately 101m of Woodton road between points 7C and 7D on sheet 6 and 7 of the streets plan
Temporarily Closed	Woodton Road	Approximately 181m of Woodton road between points 7E and 7F on sheet 6 and 7 of the streets plan
Temporarily Closed	Shotesham	Approximately 258m of Shotesham Road between points 6A and 6B on sheet 6 of the streets plan

- 2.1.3. Shotesham Road is proposed for street works and temporary closure in connection with Cable Route Corridor (CRC) trenching works, whilst Woodton Road is identified for street works, temporary closure and permanent alteration in connection with both CRC trenching works and the establishment of construction access points A53, A57 and A58.



² East Pye Solar, 7.6 Outline Construction Traffic Management Plan – Revision 1, March 2026: p. 43.

Additionally, the Access and Public Rights of Way Plan notes that there will be a permanent construction crossing on Shotesham Road.³



- 2.1.4 The Applicant does not appear to have assessed the cumulative effect of multiple interventions proposed on the local highway network serving Springwood Lane. The proposals include street works, temporary alterations, temporary closures and a construction crossing on Shotesham Road, together with additional works, alterations and closures on Woodton Road. While each intervention has been identified separately, the Environmental Statement does not appear to assess their combined effect on residents who depend on these roads for access to the wider highway network. The Applicant has therefore failed to demonstrate that community severance effects on Springwood Lane residents have been properly assessed.
- 2.1.5 This omission is significant because Springwood Lane does not form part of a through-route and residents rely on the surrounding local road network to gain access to employment, education, healthcare, emergency services and other daily activities.
- 2.1.6 No evidence has been identified demonstrating that:
- the Applicant has assessed whether residents of Springwood Lane would retain a practicable vehicular route at all times;

³ East Pye Solar, 2.7 Access and Public Rights of Way Plan – Revision 1, March 2026: p. 8

- the cumulative effects of simultaneous restrictions on Woodton Road and Shotesham Road have been modelled;
- emergency access and egress have been evaluated for properties within Springwood Lane;
- alternative diversion routes available to residents have been identified and demonstrated to be realistic; or
- the community severance effects arising from this specific location have been assessed.

2.1.7 The concern is amplified by the Applicant's proposals relating to the use of Shotesham Road and Woodton Road as construction access corridors. The Construction Traffic Management Plan identifies construction access point A53 on Woodton Road and construction crossing point A59 on Shotesham Road as part of the proposed construction access arrangements for the Cable Route Corridor.

2.1.8 Consequently, the two roads which residents rely upon for access are also proposed to serve construction traffic and construction works. This creates the possibility that restrictions introduced to facilitate construction activity could substantially reduce or prevent normal residential movements.

2.1.9 The Environmental Statement: Transport and Access (T&A) chapter states that the assessment should consider matters such as community severance and disruption to local access. The chapter specifically identifies temporary effects arising from construction traffic, road closures and restrictions as matters requiring assessment.

2.1.10 The study area expressly includes "Shotesham Road / Woodton Road / Baxter's Lane" as a transport corridor requiring assessment.⁴ However, no location-specific assessment has been identified regarding how residential access would be maintained for Springwood Lane residents if the proposed restrictions on this corridor occur simultaneously, in close succession or in a manner that removes the only practical route to the wider road network.

2.1.11 The Examining Authority is requested to seek clarification from the Applicant on the following matters:

1. Whether the Applicant has assessed the consequences of overlapping closures or restrictions on Woodton Road and Shotesham Road for residents of Springwood Lane.
2. How continuous (24/7) vehicular access for residents will be guaranteed throughout the construction period.

⁴ East Pye Solar, 6.1.11 *Environmental Statement Volume 1: Chapter 11 – Transport and Access – Revision 1*, March 2026, p. 13.

3. How emergency vehicle access and egress will be maintained under all construction scenarios.
4. Whether a specific access strategy for Springwood Lane will be secured through the final CTMP.
5. Whether the Applicant accepts that community severance effects for Springwood Lane have not been fully assessed within the submitted Environmental Statement.

2.1.12 The documentation currently before the Examination identifies both Woodton Road and Shotesham Road as roads that may be temporarily closed and simultaneously proposes construction access arrangements on those same roads. Yet no evidence has been provided that the consequences for residents of Springwood Lane, a cul-de-sac dependent upon this local network, have been specifically assessed. As a result, the Applicant has not demonstrated that reasonable residential access can be maintained throughout construction, nor that the potential severance effects on this community have been properly evaluated.

This matter is directly relevant to the ExA's principal issues concerning: Traffic and Transport; Community, health and well being; and Cumulative effects.⁵

⁵ The Planning Inspectorate (2026) Rule 6 Letter – Notification of the Preliminary Meeting and matters to be discussed, [https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN0110014-000406-XPE02a%20-%20Rule%206%20letter%20\(1%20part%20PM\)%20-%20February%202025.pdf](https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN0110014-000406-XPE02a%20-%20Rule%206%20letter%20(1%20part%20PM)%20-%20February%202025.pdf). P. 19-20.

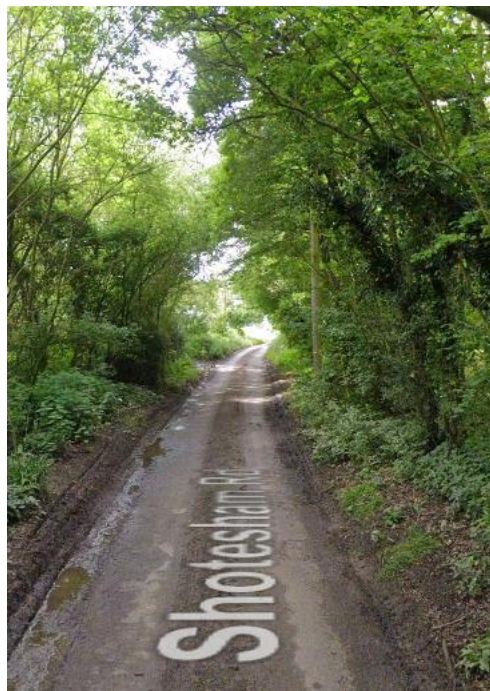
2.2. Failure to Assess Physical Suitability of Woodton Road and Shotesham Road for Construction HGVs

2.2.1 This representation is distinct from the Applicant's analysis of construction traffic volumes and routing noted in the T&A document. The concern is not the number of HGVs predicted to use the local highway network, but whether Woodton Road and Shotesham Road are physically capable of accommodating the size and frequency of construction vehicles proposed by the scheme.

2.2.2 Woodton Road and Shotesham Road are both single carriageways with limited opportunities for passing places:



2.2.3 There are also multiple instances of both roads having very low hanging tree canopies:



2.2.4 The Applicant does not appear to have assessed several important physical constraints affecting these roads.

2.2.5 In particular:

- Woodton Road and Shotesham Road are rural single-carriageway roads with limited opportunities for vehicles to pass;

- Verges cannot safely be relied upon as informal passing areas due to the presence of hidden drainage ditches which are not always readily apparent to drivers unfamiliar with the area;
- Certain sections are subject to weight restrictions;
- There are locations where the available carriageway width appears insufficient for two cars and an HGV to manoeuvre safely without one vehicle reversing or leaving the carriageway; and
- The roads serve residential properties, farms and local traffic and are not purpose-built freight routes.

2.2.6 These characteristics affect the practical operation of the road network regardless of the number of vehicles predicted by the Applicant.

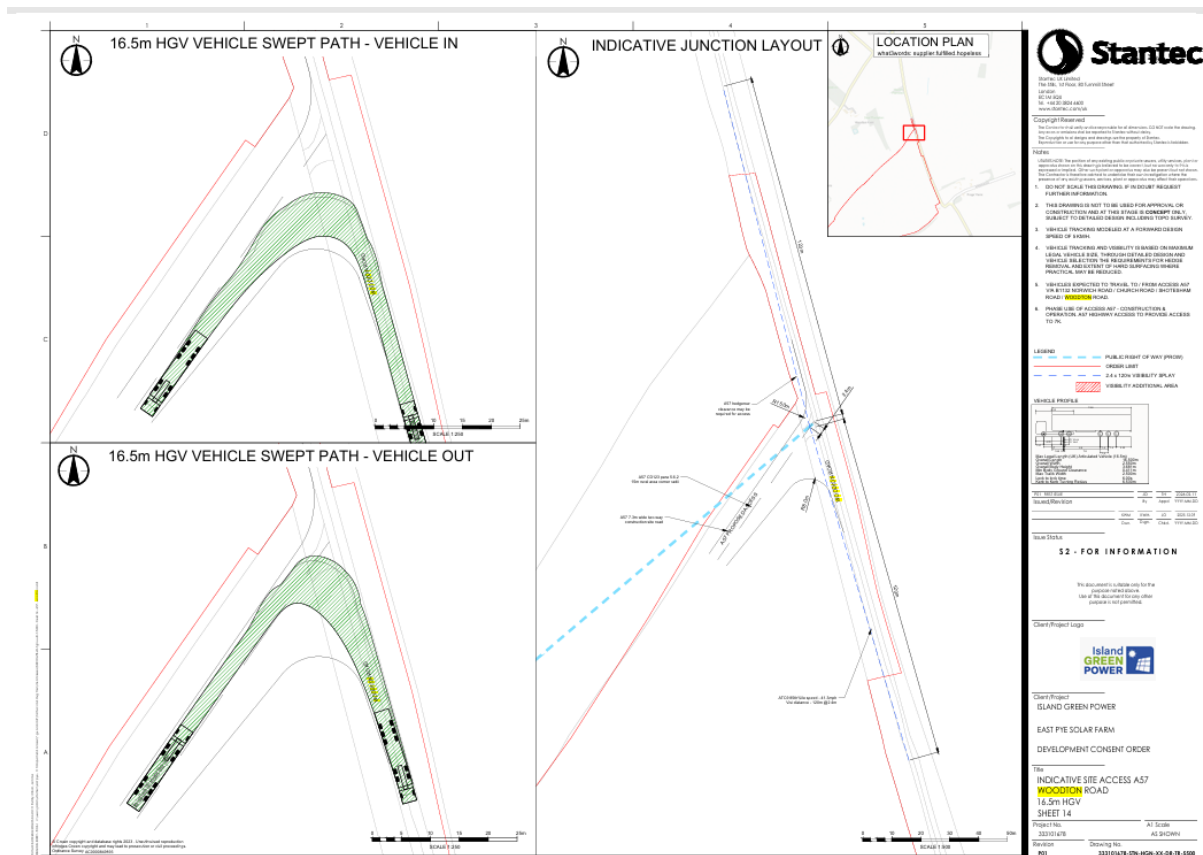
2.2.7 The Environmental Statement assesses traffic effects using traffic modelling and movement forecasts. In response to consultation comments, they have responded that Woodton Road had been investigated:

EPS3_LF_247	Respondent commented that the route from the B1132 through Littlebeck Lane, Woodton Road and Heath Road contains small, single-track lanes, bends, a dangerous Z bend and a junction.	No	The ES has considered HGV routeing and access arrangements to the Scheme and includes swept-path analysis and access design alongside suitable management and mitigation measures, shown in ES Volume 3, Appendix 11.1 - Transport Assessment [EN0110014/APP/6.3.11.1] . Management measures are indicated in the OCTMP [EN0110014/APP/7.6] and include delivery scheduling and monitoring to co-ordinate vehicle movements, waiting points for inbound construction vehicles, and the use of passing places on the LRN. These measures will minimise potential for vehicle conflict, particularly along narrow single-track lanes.
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2.2.8 However, there is very limited evidence demonstrating that the Applicant has undertaken a full assessment of whether Woodton Road and Shotesham Road are physically suitable for the construction vehicles proposed. A swept path analysis only appears to exist where they are modelling HGV's entering newly created construction entrances on a straight piece of Woodton Road, using land they aim to acquire rights to and permanently alter:

⁶ East Pye Solar, 5.11 Consultation Report Appendix 10: Section 47 Applicant Response Table – Revision 1, March 2026: p. 536.

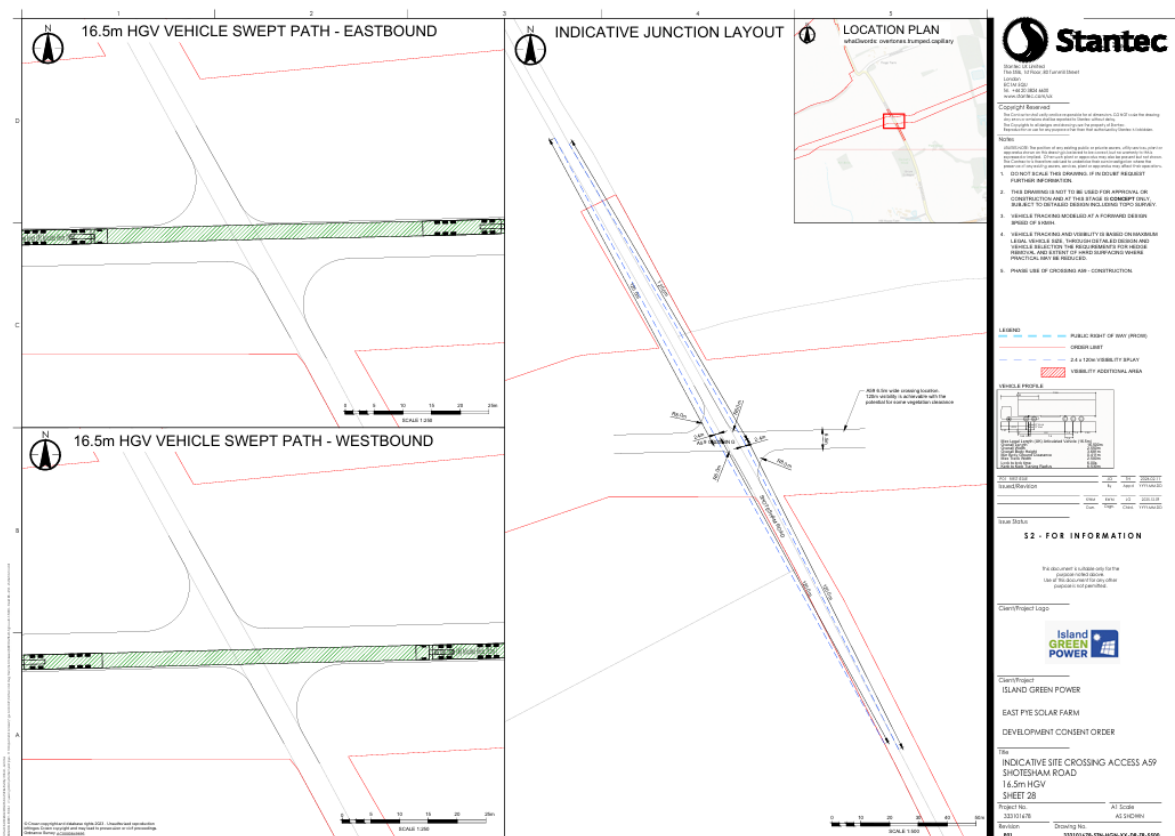


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- This swept path analysis does not account for the hidden ditches on the verges;
- This swept path analysis does not account for other vehicles on the road; and
- This swept path analysis shows that an HGV would occupy a substantial portion of the road.

2.2.9 A swept path analysis only exists on Shotesham Road for where they want to place a construction crossing:

⁷ East Pye Solar, 6.3.11.1 Environmental Statement Volume 3: Appendix 11.1 – Transport Assessment (Revision 1) – Part 2, April 2026: p. 10.



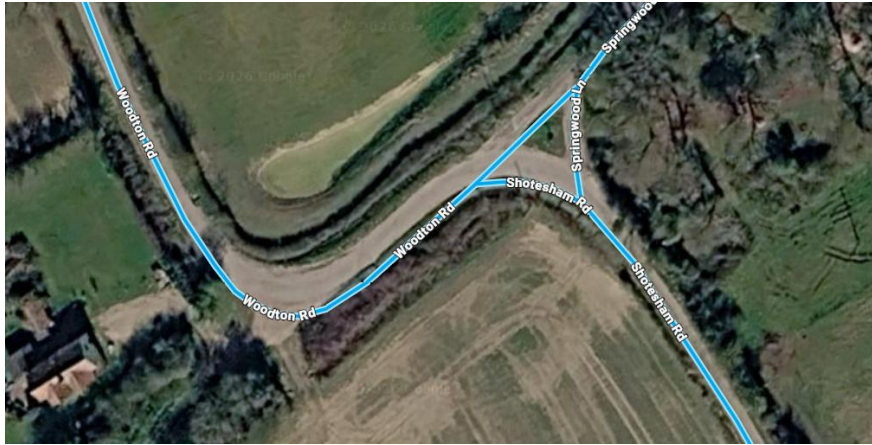
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2.2.10 In particular, the documents do not appear to demonstrate:

- swept path analysis for critical sections of Woodton Road and Shotesham Road where the road is not straight;
- assessment of vehicle passing opportunities;
- assessment of conflict between HGVs and existing residential traffic;
- assessment of carriageway edge stability adjacent to drainage ditches;
- assessment of low tree canopies and overhanging vegetation;
- assessment of how vehicles would pass where the carriageway narrows; or
- assessment of the implications of vehicles reversing along sections of road when encountering oncoming traffic.

2.2.11 The two blind bends immediately outside Springwood Lane should have prioritised scrutiny:

⁸ East Pye Solar, 6.3.11.1 Environmental Statement Volume 3: Appendix 11.1 – Transport Assessment (Revision 1) – Part 2, April 2026: p. 24.



- 2.2.12 A swept path analysis that only demonstrates how an HGV can turn into a construction access from a straight section of road (and where they gain acquisition rights to private land) does not necessarily demonstrate that the same vehicle can safely reach that access in the first place. The two questions are different.
- 2.2.13 The Applicant may have shown that a vehicle can physically enter a field access once it reaches it, but may not have demonstrated that the same vehicle can navigate constrained bends on Woodton Road without:
- overrunning verges;
 - entering opposing carriageway space;
 - damaging highway edges; or
 - encroaching onto adjacent land.
- 2.2.14 If a vehicle cannot negotiate the bends without leaving the highway, the route may not be practically suitable for the proposed vehicle movements. Large articulated vehicles often require substantially more road width when negotiating bends than when travelling on straight sections.
- 2.2.15 If the bends on Woodton Road are narrow and constrained by ditches, there is a potential risk of:
- conflict with oncoming vehicles;
 - conflict with cyclists, horse riders or pedestrians;
 - vehicles mounting verges to pass;
 - increased road edge deterioration; and
 - reduced safety margins.
- 2.2.16 These matters are particularly relevant on rural roads where recovery space is limited.
- 2.2.17 Additionally, it should be noted that in a meeting with Norfolk County Council on 24th February 2026, it is stated in the minutes that Stantec:

- MD / TH agreed to avoid formalising passing places at field and property accesses. MD noted using existing informal locations where possible was favourable.
- Also agreed to seek to avoid areas with poor visibility, bends, ditches etc. Temporary management measures (e.g. signage, speed reduction) may also be used.

2.2.18 East Pye should be held to this agreement when assessing Woodton Road and Shotesham road for physical viability.⁹

2.2.19 This issue is also directly connected to community severance.

2.2.20 If vehicles are unable to pass one another safely, residents may experience delays, difficulty accessing their properties and restrictions on ordinary movements even when no formal road closure is in place. Consequently, the practical accessibility of the area may be reduced not simply by temporary closures but by the operational consequences of introducing construction HGVs onto roads that may be physically constrained. Although there is some reference to fear and intimidation as “moderate” for Shotesham Road in the T&A, this same analysis does not seem to have been done for Woodton Road.¹⁰ This would suggest that this has not been fully investigated by the applicant in their CTMP.

2.2.21 The Environmental Statement identifies community severance as a matter requiring assessment; however, no evidence has been identified that the Applicant has assessed the severance consequences arising from the physical limitations of the local road network itself.

2.2.22 The Examining Authority is requested to ask the Applicant:

1. What assessment has been undertaken of the physical suitability of Woodton Road and Shotesham Road for the proposed construction vehicles?
2. Has swept-path modelling been completed for the likely most constrained parts of Woodton and Shotesham as is best practice?
3. Has the Applicant assessed locations where passing opportunities are limited?
4. How will HGVs safely negotiate sections with drainage ditches adjacent to the carriageway?
5. Have height restrictions arising from mature roadside trees been assessed?
6. How will residents access their properties if HGVs and local traffic are unable to pass safely?

⁹ East Pye Solar, 6.3.11.1 *Environmental Statement Volume 3: Appendix 11.1 – Transport Assessment (Revision 1) – Part 4*, April 2026: p. 18.

¹⁰ East Pye Solar, 6.3.11.1 *Environmental Statement Volume 3: Appendix 11.1 – Transport Assessment (Revision 1) – Part 4*, April 2026: p. 45.

7. How has the potential for driver conflict, reversing manoeuvres and obstruction of the carriageway been considered within the assessment of community severance?

2.2.23 The Applicant has assessed how many HGVs may use the local road network. They have access traffic demand but have not demonstrated highway suitability. The Applicant has not demonstrated that Woodton Road and Shotesham Road are physically suitable for those vehicles. This represents a separate issue from traffic generation and routing or a swept path analysis on a straight piece of Woodton Road. Until such an assessment is provided, the Examining Authority cannot be satisfied that the effects on access, highway safety and community severance have been fully assessed.

This matter is directly relevant to the ExA's principal issues concerning: Traffic and Transport; and Site selection, alternatives and design.¹¹

¹¹ The Planning Inspectorate (2026) Rule 6 Letter – Notification of the Preliminary Meeting and matters to be discussed, [https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN0110014-000406-XPE02a%20-%20Rule%206%20letter%20\(1%20part%20PM\)%20-%20February%202025.pdf](https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN0110014-000406-XPE02a%20-%20Rule%206%20letter%20(1%20part%20PM)%20-%20February%202025.pdf). P. 20.

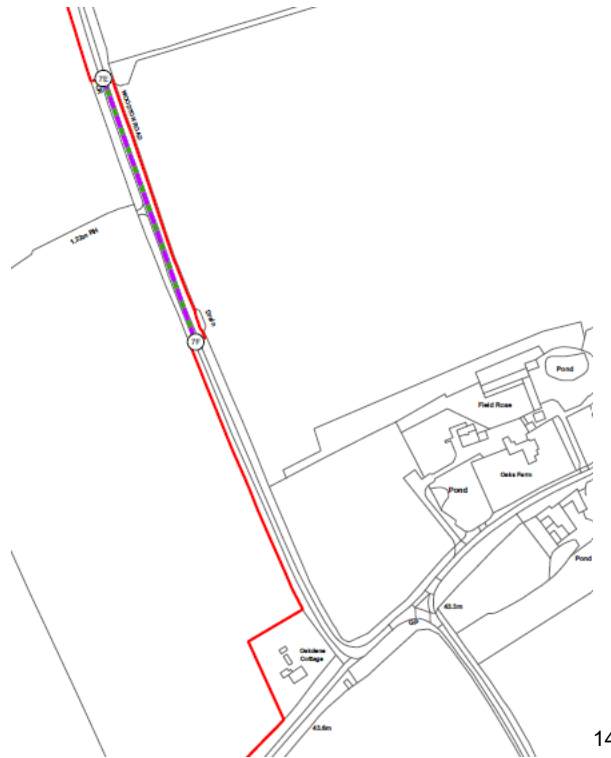
2.3. Potential Effects on an Existing Family Agricultural Business

2.3.1 The application proposes works affecting land whose landowner lives at Oaks Farmhouse (also known as Oaks Farm), Springwood Lane (06-006) via acquisition rights in the Book of Reference.¹²

2.3.2 The Land Plans and Streets Plan indicate that the proposed highway alterations extend to the existing field boundary, associated hedgerow and farm vehicle access point. An X is placed in the below image to show farm vehicle access point into the agricultural and animal rearing land:



¹² East Pye Solar, 4.3 *Book of Reference – Revision 1*, March 2026: p. 165.



- 2.3.3 This land forms part of an active family farming business and the adjoining field is used for the grazing of sheep and the production of hay. The loss or disruption of any part of this land therefore has real operational and financial consequences.
- 2.3.4 The existing field boundary and hedgerow are not merely landscape features. They form part of the practical infrastructure required for the management of livestock and agricultural operations.
- 2.3.5 The Applicant has not demonstrated that it has assessed:
- the effect of boundary alterations on livestock management;
 - the effect on grazing arrangements;
 - the effect on hay production;
 - temporary loss of agricultural land during construction;
 - impacts resulting from boundary removal or alteration;
 - requirements for replacement fencing;
 - impacts on agricultural access; or
 - the potential economic consequences for an established farming business.

¹⁴ East Pye Solar, 2.6 Streets Plan – Revision 1, March 2026: p. 8.

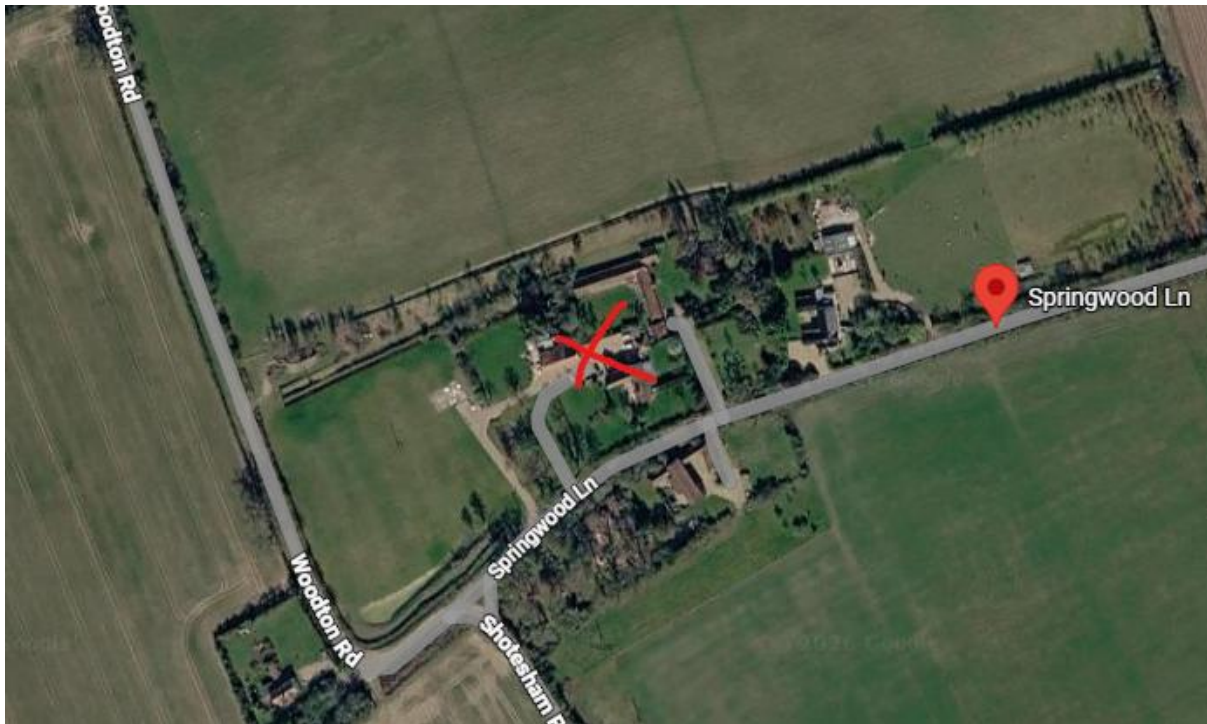
- 2.3.6 Even if the permanent land take is relatively small, the practical consequences may extend beyond the land directly acquired.
- 2.3.7 For example, construction activity adjacent to the field boundary may reduce the usability of adjoining land, affect grazing arrangements, require stock to be moved, require additional fencing and complicate routine agricultural operations.
- 2.3.8 These impacts have the potential to affect both sheep husbandry and hay production, resulting in economic consequences for the farming business. No evidence has been identified demonstrating that these matters have been assessed within the Environmental Statement.
- 2.3.9 The Examining Authority is requested to ask the Applicant:
1. What assessment has been undertaken of the effects of the proposed works on the agricultural activities carried out on land adjoining the proposed highway alterations?
 2. What land will be temporarily unavailable during construction?
 3. How will livestock security be maintained if existing boundaries are altered?
 4. What replacement fencing and stock-proof boundaries will be provided?
 5. Has the Applicant assessed the effect on hay production and grazing capacity?
 6. Has any assessment been undertaken of the financial impact on the affected farming business?

This matter is directly relevant to the ExA's principal issues concerning: Soils and agricultural land.¹⁵

¹⁵ The Planning Inspectorate (2026) Rule 6 Letter – Notification of the Preliminary Meeting and matters to be discussed, [https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN0110014-000406-XPE02a%20-%20Rule%206%20letter%20\(1%20part%20PM\)%20-%20February%202025.pdf](https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN0110014-000406-XPE02a%20-%20Rule%206%20letter%20(1%20part%20PM)%20-%20February%202025.pdf). P. 20.

2.4. Impact on Oaks Farmhouse Has Not Been Adequately Demonstrated

2.4.1 The Applicant identifies Oaks Farmhouse as a Grade II Listed Building* (Listing Number: 1170906) located approximately 180 metres east of Sub-Site 7L and 7K. As a Grade II* asset, Oaks Farmhouse is one of the most important, designated heritage assets within the study area and should be afforded considerable weight in decision-making.



2.4.2 The Cultural Heritage assessment confirms that designated heritage assets were assessed for impacts to their significance arising from changes to their setting. The assessment states that Grade II* Listed Buildings were subject to an extended study area due to their high sensitivity. Despite Oaks Farmhouse being specifically identified within the heritage baseline¹⁶, it is not apparent from the material reviewed that a detailed assessment has been undertaken of:

- the contribution made by the surrounding agricultural landscape to the significance of Oaks Farmhouse;
- the effect of Sites 7K and 7L on its rural setting;
- how views from Oaks Farmhouse towards the surrounding agricultural land would change;

¹⁶ East Pye Solar, 6.1.10 Environmental Statement Volume 1: Chapter 10 – Cultural Heritage – Revision 1, March 2026: p. 28.

- the cumulative impact of both Sites 7K and 7L when experienced from the property; or
- the effect of construction activity associated with the adjacent sites.

2.4.3 Oaks Farmhouse is not an isolated heritage asset. It derives part of its significance from its historic agricultural context and relationship with the surrounding farmland.

2.4.4 The proposed development would introduce solar infrastructure into agricultural land located in very close proximity to the property. The assessment reviewed so far does not clearly demonstrate how the effect on this historic agricultural setting has been considered.

2.4.5 This issue may be particularly relevant given that the surrounding land attached to Oaks Farm continues to form part of an active family agricultural business used for sheep grazing and hay production.

2.4.6 A further concern is that Oaks Farmhouse does not appear to have been specifically assessed as an identified visual receptor within the Landscape and Visual Impact Assessment documentation reviewed to date.¹⁷

2.4.7 The applicant states that it considered impacts on residential properties and heritage assets during design development and that design changes were made elsewhere in response to heritage concerns. The applicant also states that buffer distances around dwellings were reviewed and amended following consultation and landscape assessment work.

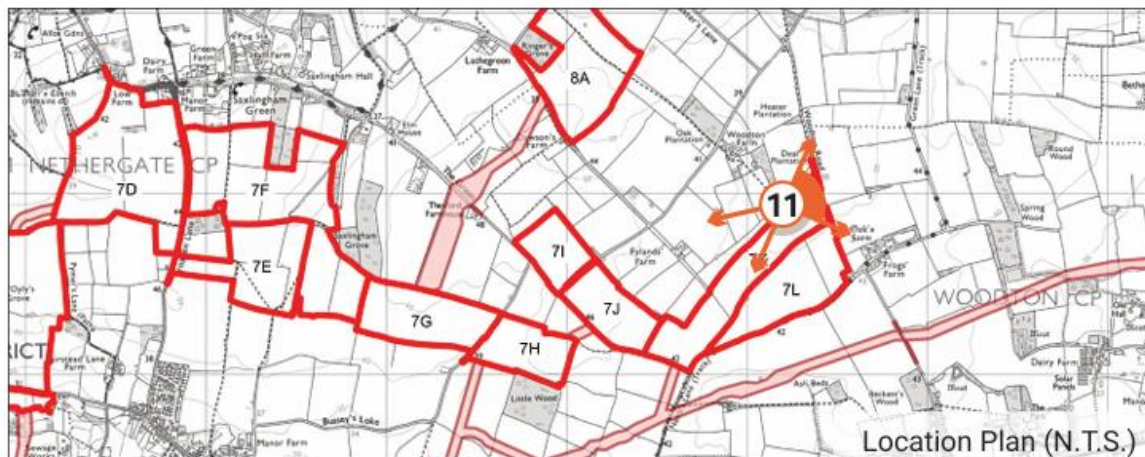
2.4.8 However, it is not apparent from the documentation currently reviewed that a specific landscape and visual assessment has been undertaken from proximity to Oaks Farmhouse itself, notwithstanding:

- its proximity to Sub-Site 7L;
- its status as a Grade II* Listed Building;
- its position within an agricultural landscape that contributes to its setting; and
- its direct relationship with Sites 7K and 7L.

2.4.9 The only visual assessment that could be found within the documentation provided by East Pye Solar for examination appears to have only assessed the visual aspect from

¹⁷ East Pye Solar, 6.1.7 *Environmental Statement Volume 1: Chapter 7 – Landscape and Visual – Revision 1*, March 2026.

Woodton Road 0.3 miles away from Oaks Farmhouse.¹⁸



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2.4.10 Although East Pye state that they will introduce some screening to apparently reduce the visibility from Oaks Farmhouse¹⁹:

■ **Sub-Sites 7I-7L**

- Visual screening in the form of infill planting of the existing hedgerows and introduction of new native broadleaf woodland at the eastern boundary of Sub-Site 7L to reduce visibility from the Grade II* listed Oaks Farmhouse.

2.4.11 This is without any assessment to state why this may be needed or may benefit the cultural heritage of Oaks Farmhouse.

2.4.12 The Examining Authority is respectfully requested to ask the Applicant:

1. What specific assessment has been undertaken of the effects of Sub-Sites 7K and 7L on the setting and significance of Oaks Farmhouse (Grade II*)?
1. How has the Applicant assessed the contribution made by the surrounding agricultural landscape to the significance of Oaks Farmhouse?
2. Has the cumulative impact of both Sub-Sites 7K and 7L on Oaks Farmhouse been assessed, and if so where is that assessment set out within the application documents?
3. Was Oaks Farmhouse assessed as a landscape and visual receptor within the Landscape and Visual Impact Assessment? If not, why not?
4. What viewpoints, photomontages or visual representations were used to assess the effect of the development as experienced from Oaks Farmhouse?

¹⁸ East Pye Solar, 6.3.7.6 *Environmental Statement Volume 3: Appendix 7.6 – Figure 7.6.7 Visualisations – Site 7*, April 2nd 2026: p. 38.

¹⁹ East Pye Solar, 6.1.1.0 *Environmental Statement Volume 1: Chapter 10 – Cultural Heritage – revision 1*, March 2026, p. 42.

If none were prepared, please explain the basis on which visual effects were assessed.

5. How has the Applicant concluded that the heritage and visual effects on Oaks Farmhouse have been adequately assessed given its proximity to the proposed development and its Grade II* status?

This matter is directly relevant to the ExA's principal issues concerning: Cultural heritage; and Landscape and visual.²⁰

²⁰ The Planning Inspectorate (2026) Rule 6 Letter – Notification of the Preliminary Meeting and matters to be discussed, [https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN0110014-000406-XPE02a%20-%20Rule%206%20letter%20\(1%20part%20PM\)%20-%20February%202025.pdf](https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN0110014-000406-XPE02a%20-%20Rule%206%20letter%20(1%20part%20PM)%20-%20February%202025.pdf). P. 19.

2.5. Potential Effects on Established Microlight Aviation Activity at Oaks Farm

2.5.1 Land associated with Oaks Farmhouse contains an established grass runway used for microlight operations. The runway has existed for many years and was specifically brought to the Applicant's attention during consultation.

2.5.2 In consultation responses, the Applicant was advised of:

2.5.3 "The impact on our established grass runway 06/24 whose 06 threshold is approximately 10 metres from the eastern end of Sites 7L and 7K."²¹

2.5.4 Despite being made aware of this aviation activity, it is unclear whether the Applicant has identified the runway within the project baseline or undertaken any assessment of the effects of the proposed development on its continued operation. This is of particular concern because the eastern end of Sites 7K and 7L lies in very close proximity to the runway threshold.

2.5.5 Based on the documentation reviewed, it is not apparent whether the Applicant has assessed:

- the potential for glint and glare effects affecting aircraft using the runway;
- whether the proximity of solar infrastructure could affect take-off and landing operations;
- the effect of construction activity on aviation safety;
- any consequences arising from the loss of surrounding open land that may currently be available for precautionary or emergency landings;
- whether the runway was incorporated into baseline surveys;
- whether consultation was undertaken with aviation stakeholders in respect of this aviation use; or
- whether the cumulative effect of Sites 7K and 7L on the operation of the runway has been considered.

2.5.6 Although the Applicant has noted that they are in correspondence with Norfolk Gliding Club, Tibbenham Airfield, Seething Airfield and others in their response to consultation responses, the owner of the grass runway (owner of Oaks Farmhouse) has not been approached by the applicant.²²

2.5.7 The Examining Authority is respectfully requested to ask the Applicant:

²¹ Representation from consultation feedback, <https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN0110014/representations/100024872>. Accessed on 17.08.2026.

²² East Pye Solar, 5.11 Consultation Report Appendix 10: Section 47 Applicant Response Table – Revision 1, March 2026.

1. Whether the microlight runway at Oaks Farm was included within the environmental baseline used to prepare the application.
2. Whether the Applicant recorded and considered the consultation response relating to the runway and its proximity to Sites 7K and 7L.
3. What assessment was undertaken of possible glint and glare effects on aircraft using the runway.
4. Whether any assessment was undertaken of the impact of Sites 7K and 7L on take-off, landing and aviation safety.
5. Whether the Applicant considered the effect of the development on the availability of nearby open land currently capable of accommodating precautionary or emergency landings.
6. Whether any aviation bodies, microlight organisations or relevant stakeholders were consulted as part of the assessment process.
7. If no such assessment was undertaken, why the Applicant considers the Environmental Statement adequately assesses the environmental effects arising from the proposal's proximity to an established aviation use.

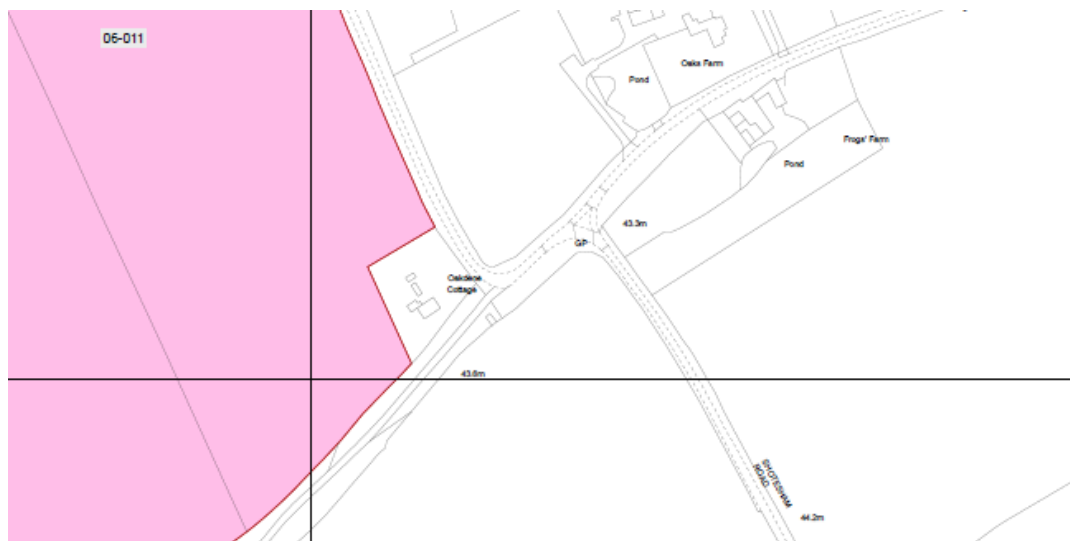
2.5.8 Given that the Applicant was notified of the existence of an established grass runway whose threshold lies approximately 10 metres from the eastern end of Sites 7K and 7L, it is unclear why no specific assessment of the interaction between the proposed development and this aviation activity can be readily identified within the application documents reviewed. The Examining Authority is therefore requested to seek clarification from the Applicant as to whether this matter has been assessed and, if so, where that assessment can be found within the submitted application documents.

This matter is directly relevant to the ExA's principal issues concerning: Aviation.²³

²³ The Planning Inspectorate (2026) Rule 6 Letter – Notification of the Preliminary Meeting and matters to be discussed, [https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN0110014-000406-XPE02a%20-%20Rule%206%20letter%20\(1%20part%20PM\)%20-%20February%202025.pdf](https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN0110014-000406-XPE02a%20-%20Rule%206%20letter%20(1%20part%20PM)%20-%20February%202025.pdf). P. 19.

2.6. Failure to Identify Oakdene Cottage as a Category 3 Person

2.6.1 The owners and occupiers of Oakdene Cottage were not identified within the Book of Reference, despite the property directly adjoining the Order Limits at Site 7L. The Book of Reference contains the names and addresses of persons who, following diligent inquiry, are considered to be persons who "would or might be able to make a relevant claim" arising from implementation of the Order. The document expressly states that Category 3 persons may include individuals with interests in land outside the Order Limits who may be entitled to compensation as a result of the construction or operation of the Scheme.²⁴



2.6.2 The residential curtilage of Oakdene shares a boundary with land proposed for development, with resulting in solar infrastructure being located immediately adjacent to their property.

2.6.3 Given the close physical relationship between Oakdene Cottage and Site 7L, it is unclear how the Applicant concluded that the owners and occupiers of Oakdene Cottage would not, or might not, be persons capable of making a relevant claim.

2.6.4 The property is not a distant receptor but an immediately adjoining residential dwelling. In these circumstances, the occupiers appear to fall within the category of persons who might potentially be affected by the implementation or operation of the authorised development.

2.6.5 Additionally, the owners of Oakdene Cottage made East Pye Solar aware that they had not been consulted – East Pye did not investigate and only provided this comment²⁵:

²⁴ East Pye Solar, *4.1 Statement of Reasons – Revision 1*, March 2026: p. 36.

²⁵ East Pye Solar, *Consultation Report Appendix 10: Section 47 Applicant Response Table – Revision 1*, March 2026: p.323

EPS2_OF_056	consultation activity. Respondent expressed they had not been consulted despite being surrounded by proposals in Oakdene, Shotesham Road, Woodton.	No	The Applicant notified over 8,400 addresses of the opportunity to take part in the Phase Two consultation via a Community Consultation Postcard. This core consultation zone was identified and described in the published Statement of Community Consultation (SoCC, 4 June 2025), provided in Consultation Report Appendix 5 - Statement of Community Consultation Materials [EN0110014/APP/5.6]. This distribution area was identified by extending a minimum distance of two kilometres from the boundaries of the Solar PV Sites and 500 metres from the edge of the Cable Route Corridor and other proposed infrastructure as presented as were to be presented at Phase Two consultation. Where proportionate and reasonable, the zone was extended further subject to the consideration of: - Existing natural and human geographical boundaries - Avoiding splitting communities - Full coverage of the host parties that host any of the Scheme. Through the Applicant's website, individuals had the opportunity to register to be kept informed about the proposals. This facility has been available since September 2024. The Applicant has and will continue to provide updates to those that have registered to be kept informed. Furthermore, the Applicant contacted 1,800 properties that it identified as being Section 44 consultees (landowners) in respect to the Scheme. Further information on the notification methods used by the Applicant can be found in the Consultation Report [EN0110014/APP/5.1].
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2.6.6 The Book of Reference adopts a deliberately broad threshold by referring to persons who "would or might" be able to make a relevant claim. However, no explanation has been provided as to whether Oakdene was assessed as part of the Applicant's land referencing exercise or why it was excluded from the Category 3 schedule.



2.6.7 The omission raises concerns regarding the adequacy of the Applicant's diligent inquiry process especially as they have assessed that there is a need for a buffer zone of vegetation around Oakdene Cottage's boundary.²⁶

2.6.8 In particular, the Examining Authority may wish to understand:

- Whether Oakdene Cottage was identified during land referencing investigations.
- Whether the property was assessed for inclusion as a Category 3 interest.

²⁶ East Pye Solar, 2.3 Works Plan – Revision B. April 2026: p. 11.

- The reasons for any decision not to include the property within Part 2 of the Book of Reference.
- Whether the omission affected the occupiers' opportunity to participate in the DCO process as affected persons.

2.6.9 The Examining Authority is requested to require the Applicant to:

1. Explain whether Oakdene Cottage was reviewed as part of the Category 3 assessment process.
2. Set out the reasoning for its omission from the Book of Reference.
3. Demonstrate how the Applicant's diligent inquiry exercise adequately identified all persons who "would or might" be capable of making a relevant claim as a result of the Scheme.

This matter is directly relevant to the ExA's principal issues concerning: Community, health and wellbeing.²⁷

²⁷ The Planning Inspectorate (2026) Rule 6 Letter – Notification of the Preliminary Meeting and matters to be discussed, [https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN0110014-000406-XPE02a%20-%20Rule%206%20letter%20\(1%20part%20PM\)%20-%20February%202025.pdf](https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN0110014-000406-XPE02a%20-%20Rule%206%20letter%20(1%20part%20PM)%20-%20February%202025.pdf). P. 19.

2.7. Ecological Connectivity: Shotesham–Woodton Woodland Complex

- 2.7.1 The Applicant identifies the Shotesham-Woodton Hornbeam Woods SSSI and associated woodland network around Sub-Sites 7F, 7G, 7H and 8B as an important ecological receptor. The Environmental Statement, design evolution process, Green Infrastructure Strategy and Landscape and Ecology Management Plan all refer to strengthening habitat corridors, increasing woodland connectivity and improving ecological resilience across this part of the Scheme. Woodton Parish Council does not dispute that ecological enhancement measures are proposed. However, it seeks clarification regarding the evidential basis upon which enhancement of functional connectivity has been concluded
- 2.7.2 The Applicant has also undertaken substantial bat survey work, which identifies high levels of bat activity across the Order Limits, records significant barbastelle activity associated with the Shotesham-Woodton Hornbeam Woods SSSI woodland complex and concludes that the landscape provides important foraging and commuting habitat connected to the wider woodland network. The bat assemblage within the order limits is assessed as being of national importance.²⁸
- 2.7.3 However, although ecological connectivity is repeatedly referenced as a benefit of the Scheme, it is unclear whether the Applicant has undertaken a formal landscape-scale ecological connectivity assessment capable of quantifying:
- existing connectivity within the woodland network;
 - the relative importance of individual woodland parcels and corridors;
 - existing ecological pinch points and movement pathways;
 - changes to network functionality during construction;
 - temporary effects during habitat establishment; and
 - whether connectivity will be enhanced in measurable terms following implementation of the proposed mitigation and enhancement measures.
- 2.7.4 The Biodiversity Net Gain Report demonstrates significant habitat unit gains and references the Norfolk Local Nature Recovery Strategy but does not appear to provide a quantified ecological network assessment.²⁹
- 2.7.5 In consultation, a respondent noted that:

²⁸ East Pye Solar, *Environmental Statement Volume 3: Appendix 8.6 – Bat activity Survey Report – Revision 1*, March 2026: p. 65.

²⁹ East Pye Solar, *Biodiversity Net Gain Report – Revision 1*, March 2026.

affected area is currently characterised by dark skies, low ambient noise, dispersed historic settlement patterns and ecologically sensitive countryside. The development lies close to important protected habitats including Pulham Market Big Wood SSSI and the Shotesham–Woodton Hornbeam Woods SSSI complex, raising concerns regarding habitat fragmentation, impacts on protected and red-listed species, and conflict with the objectives of Norfolk’s Local Nature Recovery Strategy and the wider Nature Recovery Network established under the Environment Act 2021.

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2.7.6 The Applicant provided this response:

EPS2_EF_015	Respondent expressed concern for the impact of construction on SSSI hornbeam wood.	No	multiple construction activities overlapping at the same time. The potential impact on Hornbeam Wood SSSI has been assessed within ES Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1.8] . No significant effects on Statutory Designated Sites – including Hornbeam Woods SSSI have been identified during the construction of the Scheme.
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2.7.7 The Applicant's response is framed solely around whether the Scheme would result in significant effects on the designated SSSI itself and concludes that no significant effects on the Shotesham-Woodton Hornbeam Woods SSSI have been identified. Whilst this addresses the statutory designation, it does not fully engage with the wider ecological concern raised.

2.7.8 Similarly, while the Bat Activity Survey provides extensive data on bat abundance and habitat use, it also notes limitations in fully capturing all flight paths and does not appear to present a formal connectivity model such as least-cost path modelling, network analysis, habitat permeability assessment or connectivity indices.

2.7.9 Consequently, there remains uncertainty as to whether the Applicant's conclusions regarding connectivity enhancement are supported by quantitative evidence or are primarily based on professional judgement and the anticipated benefits of habitat creation and management.

2.7.10 The Examining Authority may wish to seek further clarification from the Applicant regarding:

1. Can the Applicant confirm whether a formal ecological connectivity assessment has been undertaken for the woodland network associated with the Shotesham-Woodton Hornbeam Woods SSSI, including the surrounding ancient woodland and County Wildlife Site network?
2. Can the Applicant identify the principal woodland blocks, hedgerow corridors and stepping-stone habitats that comprise the functional network associated with the Shotesham-Woodton Hornbeam Woods SSSI and how the Scheme has been designed to maintain or enhance those routes?

³⁰ Representation from consultation feedback, <https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN0110014/representations/100023312>. Accessed on 19.08.2026.

³¹ East Pye Solar, *Consultation Report Appendix 10: Section 47 Applicant Response Table – Revision 1*, March 2026: p. 258.

3. Can the Applicant provide evidence demonstrating that ecological connectivity within the woodland network will be maintained during the construction phase, particularly where temporary cable route works, habitat disturbance or vegetation management are proposed?

This matter is directly relevant to the ExA's principal issues concerning: Ecology and biodiversity (including Habitats Regulations Assessment).³²

³² The Planning Inspectorate (2026) Rule 6 Letter – Notification of the Preliminary Meeting and matters to be discussed, [https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN0110014-000406-XPE02a%20-%20Rule%206%20letter%20\(1%20part%20PM\)%20-%20February%202025.pdf](https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN0110014-000406-XPE02a%20-%20Rule%206%20letter%20(1%20part%20PM)%20-%20February%202025.pdf). P. 19.

3. Site 10

3.1. Plot 06-008 and Old Hall Farm – Request for Further Justification of Permanent Rights Acquisition

- 3.1.1 The Book of Reference provided by the applicant identifies Plot 06-008 as approximately 31,884ha of agricultural land east of Shotesham Road, over which the Applicant seeks permanent rights rather than temporary possession or freehold acquisition.
- 3.1.2 The Applicant's general case is that rights are being sought rather than ownership because this represents a lesser interference with private property rights and is therefore a more proportionate exercise of compulsory acquisition powers. This position is set out in the Explanatory Memorandum and the Statement of Reasons.
- 3.1.3 However, while the Applicant provides a project-wide justification for acquiring rights, there has been a lack of assessment as to:
1. Why permanent rights are required across the full extent of Plot 06-008;
 2. Why a smaller area of rights would not achieve the same purpose;
 3. What consideration has been given to the operational requirements of the existing dairy farm enterprise; and
 4. How the proposed permanent restrictions would affect the future viability and operation of the dairy farming business.
- 3.1.4 Plot 06-008 forms part of an active dairy farming enterprise called Old Hall Farm. The land is used in connection with the keeping and movement of cattle and is integral to the operation of the wider holding.
- 3.1.5 The farm itself is also open to members of the public and includes a visitor destination and café, meaning the business operates as more than a conventional agricultural unit. The land therefore supports both food production and diversification activities that contribute to the rural economy. The Mayhew family, who own the farm have been farming in Woodton since the mid-1940s, add to the cultural significance of this farming venture.



Meet Freya

Freya was the first cow to arrive at Old Hall Farm, and set the trend for naming all of the cows after goddesses due to her stunning looks and excellent pedigree.

The rest of the cows names are:

Hera
Gaia
Juno
Maya
Iris
Nyx
Persephone
Styx

We also have three young pedigree Jerseys by the names of Daisy, Buttercup and Ellie - they are currently 18 months old and we hope to breed them when they are 2yrs old, so that they have their first calves a little before their third birthdays. At Old Hall Farm, we don't like to breed our cows when they are too young - we like to wait until they are fully mature in themselves before they have calves of their own. Once our three "trainees" have their calves, they will be given their goddess names!

Factfile

Age:
3

Likes:
Food (lots of it)
Being scratched at the top of her tail

Dislikes:
Mud!

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3.1.6 The Applicant's assessment appears to treat Plot 06-008 simply as agricultural land within a rights corridor, without demonstrating that proper regard has been given to the existing and continuing use of the land by a working dairy farm. This is despite the owners making East Pye Solar aware of the impact this would have on their business in the consultation period:

3.1.7 "The cable route for the proposed project will cut our farm in two and we will not be able to access over half of our land for grazing our livestock. The cable route for the proposed project will also have a significant impact on our farm shop and restaurant which is located immediately adjacent the route."³⁴

³³ Old Hall Farm. <https://www.oldhallfarm.co.uk/about-us/our-story>. Accessed 17.08.2026.

³⁴ Representation from consultation feedback, <https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN0110014/representations/100022950>. Accessed on 17.08.2026.

3.1.8 “Project is not well thought out or designed. Will cut our farm in two.”³⁵

3.1.9 “Although we are advised that the Cable Route Corridor will be a maximum of 50m wide whilst it’s under construction the land in which it is situated will be out of use for farming purposes. Old Hall Farm Woodton is one such business. The proposed Site 10 would mean that access to half of their fields will be impossible for as long as it takes to lay the cables. There are also concerns that the herd of Jersey cows will be disrupted by the voltage running under the ground once the cables are laid.”³⁶

3.1.10 The applicants only response to Old Hall Farm in consultation was regarding Landscape Visual Assessment:

EPS2_LF_308, EPS2_OF_027, EPS2_PF_046	sloping nature of the land. Respondent expressed that mitigation measures should address the issues raised regarding impacts to public rights of way (PRoWs). They noted that the Scheme could alter the character of the PRoW network, going against the provisions of planning policy and local Landscape Character Assessments. Some respondents expressed concern for visual impact on areas around footpaths around Saxlingham Nethergate and Hempnall (Site 5 and Site 7) also old hall farm in Woodton (Site 10). One respondent expressed they would support a minimum of 500m buffer away from any road or PRoWs.	No	The LVIA has assessed effect on local Landscape Character and visual effects on receptors using PRoWs, including those around Saxlingham Nethergate and Hempnall (Sites 5 and 7) and Old Hall Farm in Woodton (Site 10). Mitigation includes woodland blocks, tree belts, and hedgerow planting to screen views and reduce visual intrusion. While a 500m buffer is not feasible due to land constraints, enhanced planting and careful siting will help protect views and the recreational experience. Detail of landscape mitigation is presented in Outline Landscape and Ecological Management Plan (OLEMP) Appendix 2 Figure 2: Green Infrastructure Strategy [EN0110014/7.4].
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3.1.11 The Applicant's compulsory acquisition documentation relies primarily upon broad statements that rights are needed to facilitate the authorised development and that acquisition of rights is preferable to acquisition of ownership.

3.1.12 However, they have not identified any plot-specific assessment demonstrating:

- why permanent rights are required over 31,884 hectares in this location;
- what permanent restrictions would apply in practice;
- how those restrictions would affect grazing, livestock management, fencing, farm access, drainage works, future agricultural improvements or diversification activities; or
- whether alternative routing, narrower corridors or temporary rights were considered.

3.1.13 Additionally, assessment has been undertaken for large areas of agricultural land owned by other farmers within the Order Limits, it is unclear whether equivalent

³⁵ Representation from consultation feedback, <https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN0110014/representations/100022952>. Accessed on 17.08.2026.

³⁶ Representation from consultation feedback, <https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN0110014/representations/100023521>. Accessed on 17.08.2026.

³⁷ East Pye Solar, *Consultation Report Appendix 10: Section 47 Applicant Response Table – Revision 1*, March 2026: p.159

assessment has been carried out for land subject to permanent rights acquisition within the Cable Route Corridor as only farm “within the order limits” have been included for assessment³⁸:

Table 15.8: Summary of Farm Businesses

Farm Name	Area Farmed	Summary of Farming Enterprise
Farm Business 1	220 ha	Mostly arable farm with a combinable rotation of crops (wheat barley beans) sold to grain merchants for human consumption. Has a small herd of suckler cattle.
Farm Business 2	810 ha	Mostly arable enterprise with poultry enterprise. Growing a variety of crops (wheat, barley, oats, oilseed rape (OSR), beans, peas, triticale, linseed, miscanthus and maize). Crops sold for animal and human consumption, cover crops used for game cover.
Farm Business 3	480 ha	Arable farm with a rotation of combinable crops (wheat, barley, OSR, oats) some land has been taken out of production for SFI.
Farm Business 4	200 ha	Livestock farm with approximately 100 head suckler herd and up to 300 sheep. Cattle are sold off as stores
Farm Business 5	231 ha	Arable farm growing combinables (wheat, barley and OSR). Some land set aside for countryside stewardship and SFI. Grain sold mostly to local mill for animal feed some sold to merchants
Farm Business 6	400 ha	Arable farm growing a mix of combinables and sugar beet. Sugar beet is grown for use in AD plants, combinables sold to merchants. Rents out a small parcel of land for grazing.
Farm Business 7	570 ha	Arable farm growing combinables (wheat, beans and OSR). Contractors carry out majority of farm work. Combinables sold to merchants.
Farm Business 8	570 ha	Arable farm growing combineables, parsley, ley grass and sugar beet, plus agri-environmental crops sold for human, animal or energy use.
Farm Business 9	-	Land all farmed by contractors.

15.6.35 The sensitivity of the agricultural businesses are assessed as follows:

- 8 of the farm businesses are full-time farm businesses, one is farmed by contractors but as part of a full-time contract with other land;
- All the land within the Order Limits (excluding the CRC) is arable, grassland or under biodiversity management, with none of the land used for location-sensitive land uses such as dairy farming;
- Consequently all of the farm businesses are classified as of low sensitivity in **Table 15.3**.

3.1.14 The environmental assessment appears to focus primarily on the main solar development areas, whilst treating the Cable Route Corridor separately. This is despite the CRC being considered as “within the order limits” for other impact analysis such as ecology.

3.1.15 In fact, as part of the consultation, Natural England highlighted that the lack of detailed agricultural land classification on the CRC should be undertaken and included in the management plans:

³⁸ East Pye Solar, 6.1.15 *Environmental Statement Volume 1: Chapter 15 – Soils and Agricultural Land- Revision 1*, March 2026: p. 27

However, there are still issues that remain outstanding that require further information being provided. These includes soils matters, such as the provision of detailed Agricultural Land Classification (ALC) survey work to include the cable route corridor, clarification of the presence of peat, evidence of avoiding the siting of permanent infrastructure on Best and Most Versatile (BMV) land and the provision of a detailed Soil Resource and Management Plan. Clarification is also required on the need for protected species licences, and we advise that additional information regarding working around ancient woodland and ancient/veteran trees is included in the Landscape and Ecological Management Plan and Construction Environmental Management Plan.

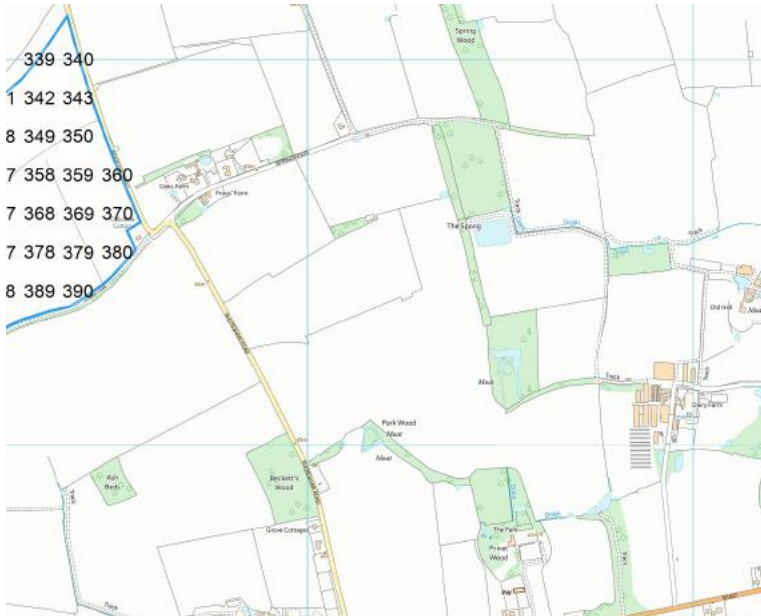
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- 3.1.16 This comment was based on the fact that agricultural land classification prepared for East Pye Solar by Amet Property surveyed and classified only land that will be used for the solar sites themselves.⁴⁰ It does not appear that any further surveys have been done on this matter.
- 3.1.17 Permanent rights are still sought over land within the Cable Route Corridor and therefore the effects on agricultural businesses remain relevant to the Examining Authority's consideration of necessity and proportionality. If agricultural land within the Cable Route Corridor has not been surveyed or assessed to the same level as agricultural land within the main development areas, there is a risk that the effect on individual farm businesses has not been fully understood. This is particularly relevant as active dairy farms according to the sensitivity receptor methodology being used in the soils and agricultural chapter would place a dairy farm as high sensitivity because:
- 3.1.18 “Dairy farms are reliant upon access to grazing land within walking distance to the farm buildings, for example, may be more sensitive to changes close to the farmyards than arable farms where whilst there may be cost and time implications, the particular land for fields may be less important. No farms are placed in the high sensitivity category as a result.”⁴¹

³⁹ Representation from consultation feedback. https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN0110014-000363-547242%20Natural%20England%20Relevant%20Representations%20East%20Pye%20Solar%20Farm%20-%20EN0110014_Redacted.pdf. Accessed on 19.08.2026.

⁴⁰ East Pye Solar, 6.3.15.1 *Environmental Statement Volume 3: Appendix 15.1 – Agricultural Land Classification – Revision 1*, March 2026: p. 20.

⁴¹ East Pye Solar, 6.1.15 *Environmental Statement Volume 1: Chapter 15 – Soils and Agricultural Land- Revision 1*, March 2026: p. 11



3.1.19 As permanent rights are sought over land within the CRC, the effects on agricultural businesses who use this land remain relevant to the Examining Authority's consideration of necessity and proportionality.

3.1.20 The Examining Authority is respectfully requested to ask the Applicant:

1. The precise infrastructure or works requiring permanent rights over Plot 06-008;
2. The justification for the full spatial extent of the rights area;
3. The assessment undertaken of impacts on the dairy farming enterprise;
4. The assessment undertaken of impacts on the visitor and café business associated with the holding;
5. Whether alternatives involving a reduced rights corridor, temporary rights or alternative routing were considered;
6. Was Plot 06-008 included within any Agricultural Land Classification survey, soil survey or agricultural business assessment?;
7. How has the Applicant assessed the effect of the proposed rights on livestock grazing, field management and the ongoing viability of the agricultural holding?; and
8. How the Applicant has concluded that the proposed acquisition is proportionate in circumstances where a substantial area of actively farmed land would become subject to permanent restrictions.

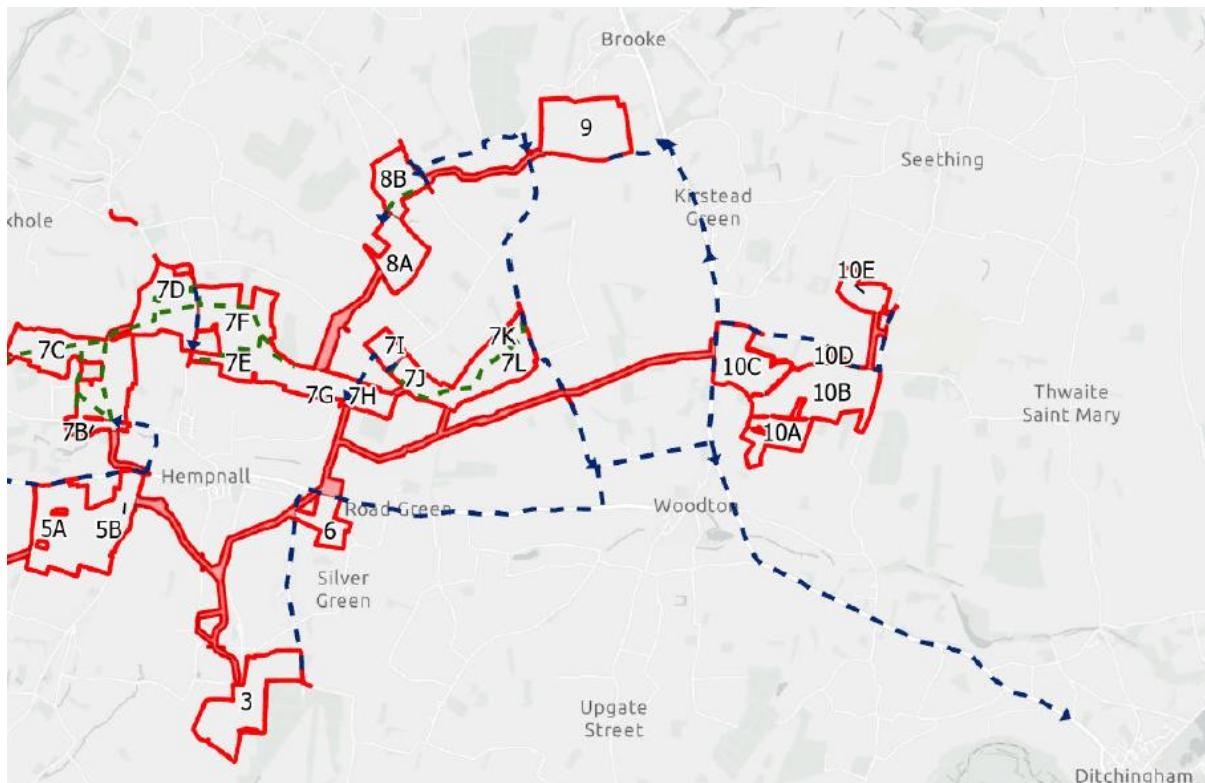
3.1.21 The current application documents do not provide sufficient plot-specific evidence to demonstrate why permanent rights are required across the entirety of Plot 06-008 or how the effects on the existing dairy and visitor enterprise have been taken into account.

This matter is directly relevant to the ExA's principal issues concerning: Community, health and wellbeing; Site selection, alternatives and design; and Soils and agricultural land.⁴²

⁴² The Planning Inspectorate (2026) Rule 6 Letter – Notification of the Preliminary Meeting and matters to be discussed, [https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN0110014-000406-XPE02a%20-%20Rule%206%20letter%20\(1%20part%20PM\)%20-%20February%202025.pdf](https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN0110014-000406-XPE02a%20-%20Rule%206%20letter%20(1%20part%20PM)%20-%20February%202025.pdf). P. 19-20.

3.2. Failure to assess Network Resilience and Community Accessibility for Woodton Village

- 3.2.1 The Applicant's assessment of transport effects appears to focus primarily on traffic volumes, vehicle routing and community severance as defined through changes in traffic flows on individual road links. The assessment methodology adopts the Institute of Environmental Management and Assessment (IEMA) approach, which assesses severance principally through percentage changes in traffic levels.
- 3.2.2 However, the submitted assessment does not appear to fully consider the resilience of the local road network serving Woodton village or the potential impacts arising from multiple simultaneous highway interventions.
- 3.2.3 The Transport and Access chapter identifies both the B1332 Norwich Road and the Shotesham Road/Woodton Road corridor as part of the transport study area.
- 3.2.4 Norwich Road provides the principal route connecting Woodton with Norwich and key services to the north. Hempnall Road/B1527 provides the principal route connecting Woodton with Hempnall, Long Stratton and the wider South Norfolk road network. These roads are of particular importance because the alternative routes available to residents are primarily narrow rural lanes with limited capacity and limited suitability for accommodating diverted traffic.
- 3.2.5 The Applicant's documents indicate that multiple roads in and around Woodton may be affected by construction accesses, cable route crossings, traffic management measures, street works or temporary restrictions, including Hempnall Road, Woodton Road, Shotesham Road, Baxter's Lane and other local roads within the village area.
- 3.2.6 Whilst individual interventions may be acceptable when assessed separately, there does not appear to be a specific assessment of the cumulative effect of concurrent works affecting the limited number of routes available to Woodton residents.
- 3.2.7 In particular, the application documents do not appear to assess a scenario in which:
- Norwich Road is subject to traffic management, restriction or delay;
 - Hempnall Road is simultaneously affected by construction activity;
 - alternative routes such as Woodton Road, Shotesham Road or Baxter's Lane are also affected by cable route works, crossings or associated traffic management; and
 - residents are required to rely upon a reduced number of available routes for access to employment, education, healthcare and other essential services.
- 3.2.8 The assessment therefore appears to focus on traffic flow impacts rather than the wider issue of network resilience and the practical accessibility of Woodton as a rural settlement.



- 3.2.9 When looking at Woodton as a whole, the application proposes street works, traffic regulation measures, temporary restrictions and development access arrangements across multiple roads serving Woodton, including Woodton Road, Shotesham Road, Norwich Road (B1332), Seething Road and Harvey's Lane. Collectively, these routes form the principal highway connections between Woodton and Norwich.⁴³
- 3.2.10 The cumulative effect of these interventions has not been clearly presented from the perspective of Woodton residents. The application documents identify works on several separate plan sheets, making it difficult to understand how the local highway network would function as a whole during construction.
- 3.2.11 Particular concern arises because Norwich is the principal regional centre for employment, secondary education, healthcare, rail services and other essential services used by Woodton residents. Where a project proposes interventions on multiple roads forming the principal outward connections from a rural settlement, the cumulative effect on day-to-day accessibility should be clearly assessed and explained.
- 3.2.12 The Applicant should therefore demonstrate:
- which routes between Woodton and Norwich would remain free from project-related restrictions at any given time;
 - whether multiple routes could be affected simultaneously;

⁴³ East Pye Solar, 7.6 Outline Construction Traffic Management Plan – Revision 1, March 2026: p. 43.

- how access to education, employment, healthcare and other essential services would be maintained throughout construction; and
- why the cumulative effect of the various highway interventions does not result in a significant accessibility impact for Woodton residents.

3.2.13 The Examining Authority may wish to seek further clarification from the Applicant regarding:

1. Whether a network resilience assessment has been undertaken for Woodton and other villages with limited highway connections.
2. Whether the cumulative effects of simultaneous works on principal and alternative routes have been assessed.
3. What commitments exist to prevent concurrent restrictions on Norwich Road, Hempnall Road and alternative routes serving the village.
4. How reasonable access for residents, businesses, service providers and emergency vehicles will be maintained throughout construction.
5. Whether a village-specific traffic management strategy should be secured to ensure the continued accessibility of Woodton during the construction phase.

3.2.14 Without such assessment, it is unclear whether the Applicant has adequately considered the potential for functional severance arising not from increases in traffic flows, but from the temporary reduction in route choice and network resilience available to residents. The submitted documents therefore appear to leave an evidential gap in relation to the continued accessibility of Woodton during construction.

This matter is directly relevant to the ExA's principal issues concerning: Cumulative effects; and Traffic and transport.⁴⁴

⁴⁴ The Planning Inspectorate (2026) Rule 6 Letter – Notification of the Preliminary Meeting and matters to be discussed, [https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN0110014-000406-XPE02a%20-%20Rule%206%20letter%20\(1%20part%20PM\)%20-%20February%202025.pdf](https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN0110014-000406-XPE02a%20-%20Rule%206%20letter%20(1%20part%20PM)%20-%20February%202025.pdf). P. 19-20.

3.3. Failure to identify Albion Nights as a Category 3 Person

3.3.1 The owner of Albion Nights, an established tourism and hospitality business operating from a rural off-grid accommodation site adjacent to the proposed cable corridor and opposite Site 10, submitted a detailed consultation representation explaining the potential impacts of the Scheme upon the business. The representation identified concerns relating to construction noise, construction traffic, impacts on surrounding walking routes, visitor experience, business reputation, occupancy levels and economic viability.

3.3.2 The unique selling points of these cabins are that they are “off-grid” experiences without wifi or plug sockets, allowing visitors to enjoy a get away from modern life in a near silent environment.



3.3.3

PAUSE FOR A WHILE

These cosy cabins give **you** the chance to enjoy some downtime all year round

Step away from the noise and **give yourself space** to truly **unplug** and **just be**

Bathe under the stars in your private **outdoor bath**

Immerse yourself in nature

Disconnect from the grid and **reconnect** with yourself

Sleep more soundly and drift home taking some of the magic with you

45

3.3.4

⁴⁵ Abion Nights (no date) *Albion Nights*, <https://www.albionnights.co.uk/>. Accessed on 28.08.2026.



3.3.5

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3.3.6

Their response in consultation was as follows:

"I object to the East Pye Solar proposal. I am extremely concerned about the impact this scheme would have on my award-winning business (Redacted). To give some context, (Redacted) operates within a rural setting where tranquillity, dark skies and uninterrupted access to the countryside are key elements to my guests' experience. Guests stay here to enjoy peaceful, off-grid stays, to escape the noise and hub-bub of city life, and to experience unplugged time, without wifi and screens. (Redacted) has been featured on BBC 1, Channel 4's George Clarke's Amazing Spaces and in The Guardian (10 of the Best Cosy Cabin Holidays in the UK), The Times (24 of the UK's Most Magical Cabin Stays), plus Simple Things, Elle and Grazia have all run features. During the construction phase, it is highly likely there will be sustained noise from heavy machinery, large vehicles, piling and groundworks. This noise fundamentally undermines everything offered to my guests. Even temporary works have the potential to cause poor reviews and to create long-term damage. I have worked extremely hard to create an excellent reputation as customer perception is crucial in this industry. Repeat bookings and word-of-mouth recommendations are vital for small tourism businesses such as mine. In addition to these noise impacts, the proximity to an established walking route around Site 10, threatens to disrupt, if not entirely loose, an added draw for visitors choosing to stay here. Many guests stay specifically for access to countryside walks. Construction traffic, temporary road restrictions and visual intrusions from works compounds, etc will have a hugely negative impact on my guests. There is, of course, also the wider implication of economic impact, with reduced occupancy rates, loss of income and a lack of confidence in the area as a tourism destination. The long term industrialisation of the

⁴⁶ East Pye Solar, 2.2 Land Plan – Revision 1, March 2026: p. 2

landscape will inevitably deter visitors and tourists from coming to this part of South Norfolk, and this will surely impact on my other businesses such as mine.”⁴⁷

- 3.3.7 Despite these concerns, the business proprietor does not appear to have been included within Part 2 of the Book of Reference as a Category 3 person and no substantive response to the representation provided in consultation appears to be recorded.
- 3.3.8 The consultation response submitted by the owner of Albion Nights raises concerns that go beyond generalised opposition to the Scheme. The representation identifies a business whose commercial model is founded upon:
- tranquillity and rural character;
 - dark skies and an undeveloped landscape setting;
 - access to surrounding countryside and walking routes;
 - the absence of modern technological intrusion; and
 - visitor experiences specifically linked to the character of the local environment.
- 3.3.9 The proprietor's evidence indicates that the business is located in proximity to the CRC proposed development infrastructure and opposite Site 10, placing it in very close proximity to construction activities and long-term operational development. Concerns were raised regarding noise from plant and machinery, heavy vehicle movements, visual changes to the landscape and disruption to recreational routes used by guests.
- 3.3.10 These concerns directly relate to potential business loss and economic harm arising from implementation of the Scheme. The representation expressly refers to reduced bookings, loss of income, reputational damage and diminished attractiveness of the area as a visitor destination.
- 3.3.11 Given that the threshold for Category 3 inclusion is whether a person "would or might" be capable of making a relevant claim, it is unclear why a tourism business owner alleging direct economic and amenity impacts arising from immediately adjacent development was not identified as a potential Category 3 person.
- 3.3.12 The Applicant's consultation material records numerous consultation responses and explanations of how comments have been considered. However, no explanation appears to have been provided regarding:
- whether Albion Nights was assessed as a potential Category 3 interest;
 - whether the proprietor was considered capable of making a relevant claim;
 - the reasons for excluding the business from Part 2 of the Book of Reference;
- or

⁴⁷ Representation from consultation feedback, <https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN0110014/representations/100023562>. Accessed on 28.08.2026.

- how the Applicant concluded that the identified commercial impacts did not warrant Category 3 consideration.

3.3.13 The omission raises concerns regarding the adequacy of the Applicant's diligent inquiry and land-referencing exercise. Where a business located immediately adjacent to the proposed development identifies specific concerns regarding loss of amenity, reduced visitor demand and consequential economic harm, it would be reasonable to expect the Applicant to demonstrate how that business was assessed against the Category 3 criteria. Without such explanation, it is difficult to understand how the Applicant satisfied itself that all persons who "would or might" be capable of making a relevant claim were identified and recorded.

3.3.14 The Examining Authority is requested to require the Applicant to:

- Confirm whether the owner of Albion Nights was assessed as part of the Category 3 identification process.
- Explain whether the consultation representation concerning business impacts was considered during the land-referencing exercise.
- Set out the reasons why the proprietor was not included within Part 2 of the Book of Reference.
- Demonstrate how the Applicant's diligent inquiry exercise adequately identified all persons who "would or might" be capable of making a relevant claim arising from construction and operation of the Scheme

This matter is directly relevant to the ExA's principal issues concerning: Noise and vibration; and Community, health and well being.⁴⁸

⁴⁸ The Planning Inspectorate (2026) Rule 6 Letter – Notification of the Preliminary Meeting and matters to be discussed, [https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN0110014-000406-XPE02a%20-%20Rule%206%20letter%20\(1%20part%20PM\)%20-%20February%202025.pdf](https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN0110014-000406-XPE02a%20-%20Rule%206%20letter%20(1%20part%20PM)%20-%20February%202025.pdf). P. 19.

Appendices

Issues by Examination Important

Priority 1	
	Springwood Lane Access
	Springwood Lane/Shotesham Road/Woodton Road Highway suitability
	Old Hall Farm compulsory rights acquisition
	Woodton village connectivity
Priority 2	
	Oaks Farmhouse (cultural heritage)
	Oaks Farmhouse (agricultural business)
	Oaks Farmhouse (aviation)
	Shotesham-Woodton woods
Priority 3	
	Oakdene category 3 allocation
	Albion Nights category 3 allocation

Requested Site Visits

1. Springwood Lane / Woodton Road / Shotesham Road Junction

Access: Public highway.

Issues to be observed:

- The relationship between Springwood Lane and its surrounding highway network.
- The dependence of residents upon Woodton Road and Shotesham Road for access to the wider road network.
- The constrained nature of local route options.
- The proximity of proposed works and access arrangements associated with Sites 7K and 7L.

Reason for inspection:

The Parish Council's representation identifies concerns regarding community severance and continued residential accessibility arising from the combined effects of proposed road closures, construction access points, traffic management measures and construction crossings on the roads serving Springwood Lane. A site visit would assist the ExA in understanding the practical implications of any restrictions affecting the limited routes available to residents.

2. Woodton Road – Constrained Sections North and South of Springwood Lane

Access: Public highway.

Issues to be observed:

- Narrow carriageway widths.
- Limited opportunities for passing.
- Verge conditions.
- Adjacent drainage ditches.
- Road geometry and visibility.

Reason for inspection:

The Applicant has assessed construction vehicle movements and specific access points, however the Parish Council remains concerned that the physical suitability of Woodton Road for repeated construction HGV movements has not been fully demonstrated. Inspection would assist the ExA in understanding the spatial constraints identified within the representation.

3. Shotesham Road Construction Crossing Location (A59)

Access: Public highway.

Issues to be observed:

- Proposed construction crossing location.
- Road width and alignment.
- Visibility conditions.
- Relationship with surrounding properties and local movements.

Reason for inspection:

The Parish Council considers that the proposed crossing forms an important component of the construction access strategy serving Site 7 and that direct observation would assist understanding of how construction traffic would interact with the existing rural highway environment.

4. Oaks Farmhouse and the Setting of Sites 7K and 7L

Access: Public viewpoints available from surrounding highways. Private access only if the ExA considers further inspection necessary.

Issues to be observed:

- Relationship between Oaks Farmhouse and Sites 7K and 7L.
- The contribution of surrounding agricultural land to the property's setting.
- Existing views towards the proposed development area.
- Existing landscape character.

Reason for inspection:

The Parish Council's representation raises concerns regarding whether the contribution of the surrounding agricultural landscape to the significance and setting of this Grade II* listed building has been fully assessed. Observation of the surrounding landscape context would assist the ExA when considering heritage, landscape and visual matters.

5. Oaks Farm Microlight Runway and Adjacent Development Area

Access: Private land – access only if considered necessary by the ExA and the landowner.

Issues to be observed:

- Proximity between the runway and Sites 7K and 7L.
- Relationship between aviation activity and proposed infrastructure.
- Existing openness of adjoining land.

Reason for inspection:

The Parish Council has identified concerns regarding the apparent absence of assessment of an established microlight runway located adjacent to the proposed development. Inspection would assist understanding of the spatial relationship between aviation activity and the proposed solar infrastructure.

6. Plot 06-008 and Old Hall Farm

Access: Public viewpoints available from surrounding highways. Private access only if considered necessary by the ExA and landowner.

Issues to be observed:

Plot 06-008.

- Relationship between the proposed permanent rights corridor and the wider farming enterprise.
- Existing agricultural operations.
- Physical context of the proposed rights acquisition.

Reason for inspection:

The Parish Council seeks further justification for the acquisition of permanent rights across Plot 06-008 and questions whether sufficient consideration has been given to the operational requirements of the existing agricultural enterprise. Inspection would assist understanding of the practical relationship between the rights sought and the farming operation.

7. Woodton Village – Network Resilience Context

Access: Public highway.

Issues to be observed:

- Principal routes connecting Woodton with Norwich and surrounding settlements.
- Relationship between Norwich Road, Hempnall Road, Woodton Road and Shotesham Road.
- Limited alternative route choices available to residents.

Reason for inspection:

The Parish Council's representation argues that the application assesses individual highway interventions but does not clearly explain their combined implications for the resilience and accessibility of the local road network serving Woodton. A site inspection would provide useful context when considering transportation and accessibility issues.

Summary

Woodton Parish Council respectfully submits that the above locations would assist the Examining Authority in understanding the practical, on-the-ground context of the issues raised in this representation, particularly those relating to transport and access, community severance, agricultural operations, heritage setting, aviation activity and compulsory acquisition. The Parish Council does not request that the Examining

Authority undertake any independent testing or investigation at these locations, but simply that they be considered as part of any future site inspection programme

Author Note

Dr Jessica Austin is a senior analyst and researcher working in a local authority in Norfolk. She has a PhD from Anglia Ruskin University and multiple accreditations in data analytics and programming languages.

Dr Austin volunteered to complete this work for Woodton Parish Council on a no-fee basis.

Further questions from the Planning Inspectorate about the contents of this report can go via Woodton Parish Council or Dr Austin can be contacted directly on: 07979751896 and jess_austin@hotmail.co.uk.

AI Statement

Microsoft Copilot Premium has been used to generate the Executive Summary portion of this report. Microsoft Copilot Premium was also used to critically evaluate the finalised report against the Rule 6 letter, guidance on submissions in terms of formatting and referencing. Microsoft Copilot Premium was used to create the appendices section for recommended site visits based on the basis of the report. The author of this report, confirms that I have checked it and I am responsible for what is says.