

East Pye Solar PINS Reference: EN0110014

OFH Hearing

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National Grid Point of Connection Sub-Site 1B

My following points are made as part of the BEPS Submission concerning the siting of the National Grid Substation south of Great Moulton, within Site 1 and the concentration of associated grid infrastructure and the extent to which the most intensive elements of the Scheme converge around Land Parcel 1 and the adjoining BESS area, all located across adjoining fields from Great Moulton to Station Road in the Tivetshalls.

- Point 1. National need does not establish that this particular location is necessary or appropriately selected.
2. Procedural Defects, Inadequate Consultation Uncertain Controls and, DCO powers
3. Consultation and Procedural Unfairness
4. Land Parcel 1 concerns
 - 4.1 This Cumulative Choke Point has the highest concentration of the most intensive and harmful effects of the scheme falling on the village of Great Moulton.”
 - 4.2 Site Selection. The Applicant has not demonstrated that the site-selection process was sufficiently transparent, criteria-led or environmentally robust.” From the documents provided this most intensive and partly permanent infrastructure at Site 1/Sub-Site 1B, is based on land availability and willing-landowner considerations
 - 4.3 Cumulative harm is not confined to visual change from one dispersed solar panel field. It is the combined effect of the convergence of the concentration of National Grid Substation, Project Substations and all major infrastructure.
5. Permanent Loss of Grade 2 BMV Agricultural Land
6. National Grid Substation & Project Substations: Non recoverable harm. The National Grid Substation/Grid Connection Infrastructure are permanent no decommissioning is planned

7. Compulsory acquisition, land-rights justification, funding and deliverability
8. Ground and Private Water Supplies, Drainage & Contamination Pathway Risk
9. European Protected Species Vulnerability
10. Ecology and Protected Species Sensitivity
11. Safety which includes:
 - 11.1 Construction access, abnormal-load movements
 - 11.2 Public Rights of Way
 - 11.3 Rail Constraint
 - 11.4 Aviation Safety and Glint / Glare Considerations

Great Moulton and BEPS request to the Examining Authority is very straightforward:

“Has East Pye actually demonstrated that Site 1B is an environmentally justified location for this concentration of infrastructure, and that realistic, less harmful alternatives were properly assessed before this location was selected?” This we think is a central issue.

To reiterate some of the above point:

BEPS does not dispute the national need for renewable energy infrastructure. Our concern is whether that national need justifies concentrating some of the Scheme's most intensive and partly permanent infrastructure in our rural village – Great Moulton

East Pye's own Site Selection Assessment confirms that Norwich Main was originally considered but rejected because of grid-capacity constraints. We consider the following is critical: East Pye records that **willing-landowner availability materially influenced the search; its agents focused on large landholdings with potentially willing owners, and not every area of unconstrained agricultural land was examined in detail**. Alternative land south of Station Road was also rejected because a willing landowner was not forthcoming.

[APP/7.20; APP/6.1.5]

Why is this so important: Site 1B is not full of solar panel. It is where the National Grid Substation, 400 kV Project Substation, grid connection works, overhead-line alterations, cable routes, construction access and abnormal-load movements converge and solar arrays are located. The adjoining BESS & substation adds another major industrial and safety component.

We therefore regard Site 1B as a **cumulative infrastructure choke point**. East Pye has assessed individual topics, but we have not identified one clear receptor-level assessment bringing together the combined effects on Great Moulton from noise, lighting, traffic, landscape change, drainage, ecology, land take and long-term electrical infrastructure.

[APP/6.1.19; APP/7.6]

There is also permanent harm. East Pye records that the National Grid Substation alone would permanently remove approximately **6.1 hectares of Grade 2 Best and Most Versatile agricultural land**. **[APP/6.1.15]**

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"Has East Pye actually demonstrated that Site 1B is an environmentally justified location for this concentration of infrastructure, and that realistic, less harmful alternatives were properly assessed before this location was selected?" This we think is a central issue.

Thank you

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Relevance of the Oxford EN010147 Secretary of State Request

The Secretary of State request for further information in the Botley West Solar Farm Case, Oxford EN010147, is not being relied upon as a binding precedent, but we are using it as a recent example of the type of information which maybe material in a large solar NSIP where concerns have been raised about alternatives, design evolution, mitigation, grid-connection dependency and cumulative impacts.

The specific advice that the The Secretary of State covers the same categories that directly relevant to East Pye because the most serious impacts crystallise around Site 1A-1D where the National Grid substation, project substation, overhead-line works, cable routes, construction access, BESS-related infrastructure and solar arrays converge close to Great Moulton and Tivetshall and the siting of the BESS adjacent to Site 1.

The Information sort was: on site selection, rejected grid-connection options, land-search methodology, locational disadvantages, National Grid substation delivery, connection dates, tower works, updated grid documentation, LVIA, RVAA, BMV land, ecology, aviation, hydrology, protective provisions, land-rights negotiations and the implications of possible layout reductions.

We therefore submit that East Pye should not be permitted to rely on broad national need, outline mitigation and fragmented topic chapters to justify this location. East Pye should be required to provide a coherent, site-specific and receptor-level explanation of why Land Parcel 1 was selected, how less harmful alternatives were rejected, how grid infrastructure will be delivered, whether all associated works are within the Order Limits, and whether the cumulative effects on residents, PRoW users, private water supplies, ecology, heritage, roads and aviation have been properly assessed.

Executive summary

This submission challenges the siting and justification of the proposed National Grid 400kV substation at Great Moulton. The available evidence indicates that the site was not selected through a neutral, criteria-led process.

1. No Need

The Statement of Need does not overcome the regional oversupply and proportionality problem

BEPS objects to the applicant's Statement of Need because it does not demonstrate a convincing need for this particular Scheme in this particular location, but instead relies on broad national policy support for solar generation in principle.

The critical point is that the applicant's own Statement of Need is said expressly to acknowledge that the Site lies at the border of the "Central England" and "E. Anglia" transmission network regions and that NESO's Connections Reform process has already prioritised sufficient solar schemes to meet the relevant Clean Power 2030 regional capacity ranges for 2035 in both regions.

If that is correct, it is a striking concession: it means the relevant regional ranges are already met by prioritised schemes, so the need for Solar cannot simply be assumed from national policy statements about optionality, attrition and urgency.

The applicant's own ES Chapter 5 confirms that the alternatives exercise is framed from the outset by an asserted "clear and urgent need" for the Scheme at the proposed scale, and that even a smaller development was not taken forward as a reasonable alternative. In BEPS's submission, that approach begs the very question that should be answered. Once the relevant regional capacity ranges are already said to be met by other prioritised projects, the applicant must show why this highly constrained 500MW scheme, with major and disputed effects across ecology, water, heritage, agricultural land, transport and human health, is nevertheless necessary and proportionate here. BEPS further objects that the claimed solar-plus-storage justification is itself contingent, because the Statement of Need is said to admit that the BESS has only Gate 1 prioritisation and no confirmed indicative connection date, while still relying on storage-led benefits of flexibility, affordability and resilience.

Accordingly, BEPS submits that the Statement of Need materially overstates what national policy does for the applicant: it may establish a general need for low-carbon infrastructure, but it does not establish that East Pye Solar is regionally necessary, proportionate or justified once the existing prioritised pipeline and the Scheme's very substantial local harms are properly weighed.

2. Procedural Defects, Uncertain Controls and Inadequate Consultation

DCO powers, deferral and deliverability

BEPS objects that the draft Development Consent Order does not yet provide a sufficiently certain, enforceable or environmentally assessed basis for consent. PINS has already identified issues including uncertainty around "permitted preliminary works", the need to tighten the definitions of "commence" and "maintain", inconsistent document dates and terminology, and reliance on qualified wording in outline management plans.

These defects are material because they affect whether all works capable of causing significant environmental effects have been assessed and lawfully secured. The repeated use of phrases such as "where practicable", "as far as practicable", "where appropriate" and "to be determined at detailed design" leaves important mitigation for watercourse crossings, haul routes, noise, drainage, firewater, ecology, archaeology, utilities and decommissioning insufficiently fixed at examination stage.

BEPS therefore submits that the Examining Authority should require a corrected and consolidated draft DCO, narrowed definitions of “commence” and “maintain”, clear confirmation that preliminary works are within the assessed ES envelope, and precise requirements securing all material mitigation through enforceable standards, triggers, approval mechanisms and monitoring obligations.

This application cannot be treated as a stable control package unless the DCO certification schedule, document dates, titles and version numbers are corrected. In a scheme relying heavily on outline documents and certified plans, document-control defects directly affect enforceability, PINS has given multiple concrete examples of multiple concrete examples: Schedule 12 says February 2026 while cover pages say March 2026; the draft DCO calls Appendix 10.6 an “Outline Archaeological Mitigation Strategy” although the submitted document is titled “Archaeological Mitigation Strategy.

BEPS is concerned that the application documents do not describe the location of the BESS and associated grid-hub infrastructure with sufficient consistency. ES Chapter 4 appears to describe Work No. 2, the BESS compound, as being contained within Sub-Site 1B, while other documents refer to a separate BESS Site. This should be clarified because the location and relationship between the BESS, Sub-Site 1B, the National Grid Substation and associated project substations is central to the assessment of fire safety, drainage, access, landscape, noise, cumulative grid-hub effects and land powers.

BEPS submits that the Applicant should be required to provide a corrected and consolidated explanation of the BESS location, its relationship with Sub-Site 1B and the wider grid-hub infrastructure, and confirmation that the ES has assessed the correct worst-case layout

3. Consultation Adequacy

We object to the adequacy and reliability of the statutory consultation due to material defects in coverage, reporting and access.

The applicant’s notices show it related to an exceptionally large and complex scheme, including BESS, National Grid substation options, cable-route corridors, works to the existing 400kV overhead line and pylons, compulsory acquisition powers, and a 60-year operational life. Consultees required clear, accurate and stable information; in BEPS’s submission, that was not provided.

BEPS further submits that consultees were asked to comment on a project that was not sufficiently settled, undermining their fair opportunity to understand and respond to the likely significant effects of the scheme ultimately applied for.

Access to the full material was constrained: the section 48 notice and section 46 notification stated that hard copies of the PEIR and PEIR NTS were available only on payment of £750, while other materials were free. BEPS submits this plainly limited effective public access to full environmental information.

At the acceptance state, the following matters were framed as acceptance-stage observations and did not refuse acceptance. BEPS submitted that the listed inadequacies go beyond typographical matters. They include uncertainty over the scope of authorised works, whether potentially significant effects have been assessed, the precision and enforceability of mitigation, CA funding evidence, HRA completeness, flood-risk assumptions, consultation coverage and usability of examination documents and argue that the application documentation requires close scrutiny and correction before the Examining Authority can be satisfied that the proposal is fully examinable, enforceable and environmentally assessed. (EN0110014-000275-Section 51).”

4. Land Parcel 1 as the Cumulative Infrastructure Choke-Point

4.1 Choke Point

Land Parcel 1 should be assessed as the point of convergence for the Scheme's most intensive infrastructure. The harm is not confined to visual change from one substation. It is the combined effect of grid infrastructure, cable works, overhead-line changes, access, construction traffic, lighting, drainage, noise, safety controls and land-take. That convergence creates a materially different impact from dispersed solar panel fields and requires a specific cumulative assessment for Great Moulton.

The Planning Inspectorate's cumulative assessment guidance, reflected in the Applicant's own Appendix 2.4, distinguishes cumulative effects from in-combination effects. The Applicant's assessment should therefore explain how the combined and interacting effects fall on the same receptors in and around Great Moulton.

The Applicant's topic-by-topic approach obscures the cumulative reality at Land Parcel 1. The National Grid Substation, Project Substation, overhead-line works, cable routes, construction traffic, lighting, drainage, noise, firewater and land-rights powers converge on the same community and receptors. A receptor-level and place-based cumulative assessment is required. A topic-by-topic conclusion of "not significant" is not a substitute for a place-based assessment of the grid hub as experienced by residents, rights-of-way users, ecological receptors and landowners

4.2. Site selection - unlawful or inadequate alternatives

BEPS objects that the Applicant has not demonstrated a lawful, transparent or environmentally robust site-selection and alternatives appraisal for the proposed National Grid substation and associated 400kV infrastructure at Site 1 / Sub-Site 1B.

The relocation and escalation of grid infrastructure into this location materially changes the character of the Scheme: a 400kV installation is not comparable to a smaller local substation, and brings materially greater landscape, visual, noise, access, safety, EMF, drainage, ecological, agricultural and community consequences. The selected site would concentrate the National Grid substation, 400kV project substation, BESS-related infrastructure, overhead-line works, access routes, fencing, lighting, drainage and security equipment into and around a sensitive rural location. That concentration should have triggered a comprehensive reassessment of alternatives and environmental effects, but the Applicant has not demonstrated that such a reassessment has been undertaken.

The defect is fundamental because the alternatives appraisal appears to have been materially constrained by land availability, willing landowners and prior land assembly, rather than by a genuinely open, criteria-led comparison of reasonable alternatives.

Regulation 14 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 requires the Environmental Statement to describe the reasonable alternatives studied, explain the main reasons for the chosen option, and compare environmental effects. NPS EN-5 also requires early and proper application of the Horlock Rules, including avoiding high-amenity areas where possible, protecting important landscape and ecological features, using landform and existing screening, and minimising visual, noise and other environmental effects as far as reasonably practicable.

BEPS submits that the Applicant has not met that standard. It has not shown that Great Moulton was selected as the least harmful or most appropriate location, rather than the most available or convenient one. Nor has it provided a convincing like-for-like explanation of why constraints treated as disqualifying elsewhere, including rural access limitations, road geometry, land-take,

proximity to receptors, ecological sensitivity and landscape exposure, are said to be manageable at Great Moulton.

The Examining Authority should therefore attach substantial negative weight to the Applicant's site-selection case unless and until a revised, legally compliant alternatives appraisal is provided. That appraisal should identify the full search area, all reasonable alternative siting zones, including land not already controlled by willing landowners, and assess them consistently against environmental, technical, planning, safety and community criteria. It should also properly apply the Horlock Rules, assess lower-grade agricultural land, consider Gas-Insulated Switchgear and other lower-footprint technologies, and examine the cumulative effects of the western infrastructure cluster. On the evidence presently available, BEPS submits that the Applicant has not justified placing permanent large-scale transmission infrastructure on Grade 2 agricultural land in an exposed rural landscape close to homes, public rights of way, ecological receptors, heritage assets and private water supply risks.

The Applicant cannot and should not safely rely on earlier assumptions if those assumptions were made for a materially different infrastructure arrangement. BEPS submits that the Applicant has failed to do so.

BEPS is particularly concerned that the Applicants site-selection and alternatives appraisal has not been properly reviewed following the relocation and escalation of grid infrastructure.

4.3 Cumulative impact

Site 1 should be assessed as the point of convergence for the Scheme's most intensive infrastructure. The harm is not confined to visual change from one substation. It is the combined effect of grid infrastructure, cable works, overhead-line changes, access, construction traffic, lighting, drainage, noise, safety controls and land-take. That convergence creates a materially different impact from dispersed solar panel fields and requires a specific cumulative assessment for Great Moulton.

The Planning Inspectorate's cumulative assessment guidance, reflected in the Applicant's own Appendix 2.4, distinguishes cumulative effects from in-combination effects. The Applicant's assessment should therefore explain how the combined and interacting effects fall on the same receptors in and around Great Moulton.

The Applicant's topic-by-topic approach obscures the cumulative reality at Site 1. The National Grid Substation, Project Substation, overhead-line works, cable routes, construction traffic, lighting, drainage, noise, firewater and land-rights powers converge on the same community and receptors. **A receptor-level and place-based cumulative assessment is required.** A topic-by-topic conclusion of "not significant" is not a substitute for a place-based assessment of the NatGrid Substation & 400kV Project Substation as experienced by residents, rights-of-way users, ecological receptors and landowners

5. Permanent Loss of Grade 2 BMV Agricultural Land

EPS submits that the proposed siting of the National Grid substation and 400kV Project substation at Site 1B is unacceptable in soils and agricultural land terms. Site 1B is identified in the Applicant's evidence as Grade 2 Best and Most Versatile agricultural land. The National Grid substation alone would permanently remove at least 6.1 hectares of Grade 2 land, with further Grade 2 land required for the 400kV Project substation and associated infrastructure, including access tracks, cabling, drainage, fencing, security works and related development.

This is not equivalent to the temporary or potentially reversible use of land for solar panels. The Applicant's general reliance on reversibility and continued agricultural compatibility may apply differently to panel fields than to permanent or semi-permanent infrastructure such as substations, grid equipment, access works, drainage systems and fire-safety infrastructure.

These elements involve a more intensive and durable change in land use, with greater potential for soil sealing, excavation, compaction, drainage alteration, fragmentation and long-term loss of agricultural function.

The concern is also cumulative. The Scheme would concentrate permanent and long-term infrastructure across Site 1, Site 2 and the BESS Site, including Grade 2 land at each location. The Applicant's worst-case assessment identifies up to 28.9 hectares of Grade 2 BMV land affected, rising to 37.9 hectares if mitigation planting is treated as permanent agricultural land loss. We would submit that a component-by-component assessment understates the true effect, because the cumulative loss, disturbance, fragmentation and potential downgrading of BMV land across the western infrastructure cluster is materially greater than the sum of individual elements.

The soils and agricultural land harm must also be considered alongside the Applicant's own landscape assessment. Within LCA E2 Great Moulton Plateau Farmland, significant Major Adverse effects are identified during construction, with significant Moderate Adverse effects during operation and remaining significant by Year 15. For Site 1, effects remain Major Adverse due to the scale of the infrastructure. This reinforces We would ' concern that the proposed grid hub would impose a permanent industrialising effect on high-quality agricultural land within a sensitive rural landscape.

We would further submit that the Applicant has not demonstrated that the permanent loss of Grade 2 land at Site 1B is unavoidable, or that Site 1B represents the least harmful location. The siting appears to have been influenced by land availability and willing landowners rather than a neutral, criteria-led assessment of reasonable alternatives. The Applicant has not shown that lower-quality agricultural land or less damaging layouts were properly assessed and rejected on planning merits.

Given the permanent nature of the proposed grid infrastructure, the loss of high-quality BMV land requires a clear and compelling justification. We would submit that this justification has not been provided. Substantial negative weight should therefore be given to the permanent and cumulative loss, disturbance and degradation of Grade 2 BMV land at Site 1B and across the wider western cluster. The proposals should not be accepted unless the Applicant provides robust evidence that no less damaging alternative exists.

5.1 Soils, BMV land and reversibility

We would submit that the Applicant's reliance on reversibility and continued agricultural compatibility should be treated with caution in relation to Land Parcel 1. While such arguments may have some relevance to solar panel fields, they apply differently to permanent or semi-permanent infrastructure such as substations, grid equipment, access works, drainage systems and fire-safety infrastructure.

These elements involve a more intensive and durable change in land use than raised solar arrays and may result in greater disturbance, compaction, sealing, excavation and long-term loss of agricultural function. The planning balance should therefore distinguish clearly between temporary panel fields and the more permanent grid-hub infrastructure proposed on Best and Most Versatile agricultural land.

6. National Grid Substation and Project Substation: Non recoverable harm

BEPS objects to the adequacy of the Applicant's assessment of water-environment risks arising from the proposed National Grid substation and 400 kV project substation. The assessment does not adequately address the toxic and polluting substances associated with major high-voltage infrastructure, including transformer oils, insulating fluids, fuels, hydraulic oils, concrete washout, contaminated sediment, firewater, firefighting foams, metals, switchgear residues and hazardous maintenance wastes.

This omission is particularly serious because Site 1 / Sub-Site 1B is located in an area where private water supplies and permitted abstractions are present. The Applicant's own material identifies multiple private water supplies or abstractions within the study area, yet the site-selection and environmental assessment have not demonstrated that private water supply risk, groundwater pathways, recharge zones or emergency contamination scenarios were given determinative weight.

A 400 kV substation is a permanent industrial installation. Its water risks are not confined to ordinary operation. They include construction disturbance, fuel and oil spills, transformer failure, bund leakage or overtopping, contaminated drainage, extreme rainfall, firefighting runoff, maintenance activity and decommissioning. In the event of a fire, contaminated firewater may contain oil, soot, metals, combustion residues and foam chemicals. Given the known persistence and public-health concern associated with PFAS contamination in groundwater and drinking-water sources, the Applicant should be required to confirm that PFAS-containing firefighting foams will not be used or stored and to provide a robust firewater containment strategy. ([The Guardian](#))

The Applicant has not shown, through a site-specific hydrogeological risk assessment, that contaminants could not migrate through shallow groundwater, permeable soils, field drains, cable trenches or preferential pathways to private water supplies. Nor has it demonstrated that the cumulative risks from the National Grid substation, 400 kV project substation, BESS, cable corridors, pylons, access roads, construction compounds and Sub-Site 1D have been assessed as an integrated infrastructure cluster.

BEPS therefore requests that the Examining Authority require a revised water-environment and private-water-supply risk assessment before any positive weight is attached to the selected location. That assessment should include baseline testing, a source-pathway-receptor model, oil and firewater containment design, emergency response measures, monitoring commitments, alternative water supply provision, and a transparent comparison of whether alternative locations would materially reduce risks to groundwater and private water supplies.

The ES does not demonstrate that Sub-Site 1B is a safe or appropriate location for permanent grid infrastructure. The ExA should therefore apply substantial negative weight to the unresolved groundwater and private-supply risks.

7. Compulsory Acquisition and Inadequate Funding

The case for compulsory acquisition is not yet made. The Applicant has not provided sufficient quantified funding information for the land and rights it seeks to acquire, nor has it demonstrated that acquisition of Sub-Site 1B and associated rights is necessary and proportionate once alternatives, environmental constraints and cumulative effects are properly tested.

This is not merely a landowner compensation issue. It goes to whether there is a compelling case in the public interest for compulsory acquisition. PINS has expressly advised that the Funding Statement should be amended to include the Applicant companies' financial standing and a clear quantified estimate of compulsory acquisition costs. Until that is provided, the compulsory acquisition case is incomplete

8. Ground Water, Private Water Supplies and Contamination Risk

BEPS submits that the Environmental Statement (ES) does not provide a legally robust or integrated groundwater and water-environment case for the proposed permanent National Grid Substation and associated 400 kV infrastructure at Sub-Site 1B.

While the Applicant identifies credible contamination and deterioration mechanisms — including piling and foundation works, impermeable areas and drainage, polluted runoff, transformer oils,

concrete bleed water, sediment mobilisation and contaminated firewater; the ES relies heavily on outline design, embedded mitigation and post-consent requirements.

Material evidential gaps remain at Examination stage, including:

- Receptor-specific assessment and enforceable protection for nearby private water supplies.
- A consolidated cumulative groundwater protection assessment for the Sub-Site 1B grid-infrastructure hub.
- A clear Water Framework Directive (WFD)/UKTAG “no deterioration” rationale for the relevant groundwater body and hydraulically connected surface waters.

BEPS therefore requests that the Examining Authority (ExA) require the further evidence and secured containment and contingency measures set out below before making any recommendation. Failing that, substantial negative weight should be attributed to this unresolved and inadequately mitigated risk.

9. European Protected Species/Barbastelle deliverability

The Barbastelle bat issue is a legal deliverability issue, not only an ecological concern, with the Scheme affecting a landscape used by barbastelle maternity colonies and Core Sustenance Zones. The Applicant’s ecology chapter recognises the presence of nationally important bat assemblages and multiple Core Sustenance Zones for Barbastelle maternity roosts in the Order Limits, and relies on retained hedgerows, buffers and avoidance measures to conclude no significant loss of foraging or commuting routes [APP/6.1.8, paras 8.9.606-8.9.608]. However, evidence and Natural England’s favourable-conservation-status definition show the particular sensitivity of Barbastelle to roosting, foraging connectivity, lighting and disturbance.

Natural England’s 2024 FCS definition states that Barbastelles are associated with broadleaved woodland, require numerous roost trees, forage in woodland and riparian habitats, can travel up to 20km from roost sites to preferred foraging areas, are light-shy, and are sensitive to disturbance. Tinsley et al. (2023) found significant negative effects of ground-mounted solar PV developments on bat activity and recommended that solar PV developments should be screened in EIA for ecological impacts, with mitigation and monitoring. These matters reinforce the need for a precautionary examination of habitat fragmentation, lighting, construction disturbance and long-term grid-hub effects.

The licensing issue is strongest when tied to alternatives. If the Applicant has not shown that there is no satisfactory alternative to Land Parcel 1, the EPS licensing case remains uncertain. The Secretary of State should not assume that a protected-species licence is likely to be granted where the siting evidence for the grid hub remains incomplete and where lower-impact alternatives have not been robustly excluded.

The Applicant must demonstrate that impacts can be avoided or lawfully licensed. If the alternatives case for Sub-Site 1B and the wider layout remains incomplete, the no-satisfactory-alternative test for EPS licensing remains uncertain.

Ecology and Protected Species Sensitivity

The parcel lies within a landscape supporting:

- red-listed plant species (e.g. Sulphur clover; Dyer’s; Greenweed Petty; Genista tinctoria Spiny Restharrow; Ononis spinosa; Crosswort;
- Cruciate laevipes; Pepper saxifrage; Silaum silaus

- red-listed and amber-listed birds; Lapwing, Grey Partridge, Turtle Dove, Swifts, Sky Larks
- invertebrate assemblages of conservation concern;
- hedgehogs and other protected fauna.

Construction-phase disturbance is incompatible with the retention or enhancement of these features. The Applicant's reliance on this parcel for mitigation is therefore not credible.

Field edges are also sites of concern, and as they are currently less well documented than verges there is an equally pressing need for survey before any irreversible changes take place. For example, Prangle Lane track, which looks like it may be affected by the scheme, is in effect a field edge of great importance, while the field entrance at Market Lane RNR is a highly valuable and irreplaceable habitat.

PINS has identified that the HRA documentation is inconsistent and that citation/Natura 2000 data sheets for the European sites considered were not submitted with the HRA report. We would submit that this weakens the audit trail for HRA screening and makes it harder for the competent authority and Interested Parties to test whether the correct conservation objectives and qualifying features have been assessed

10. Safety, Emergency Access, Fire, Rail, Abnormal Loads and Aviation

We would submit that Site 1 is not a simple solar parcel but a concentrated safety-critical infrastructure hub. The Applicant's documents identify Site 1 as including Sub-Sites 1A–1D, with the National Grid Substation and 400kV Project Substation both proposed within Sub-Site 1B. Underground and/or overhead lines, including new pylons between the National Grid Substation and the Point of Connection, would also be located within Sub-Sites 1A–1D. The BESS Site is functionally linked to this western grid hub.

Fire safety, transformer delivery, abnormal-load routing, emergency access, rail interface and aviation safety are therefore central to whether Sub-Site 1B is a safe, deliverable and acceptable location. We would submit that these matters should not be treated as post-consent details where they go directly to the suitability of the site and the adequacy of the Environmental Statement.

10.1 Fire Safety and Emergency Response

We are concerned that the fire safety case for Land Parcel 1 remains underdeveloped and too dependent on later control documents. Chapter 18 records that PINS expected fire risk associated with battery storage, including firefighting and containment measures, to be addressed through the Outline Battery Safety Management Plan. It also records concerns relating to hydrogen fluoride, prolonged fire duration, PFAS, contaminated firewater and pollution risks to drinking water, groundwater, rivers, wildlife and soils.

The Applicant appears to rely on the Outline Battery Safety Management Plan, a later detailed Battery Safety Management Plan, further engagement with Norfolk Fire and Rescue Service, and firewater assessment in Chapter 9. We would submit that this is insufficient unless the assumptions, measures and enforceability of those documents are available, tested and secured through the DCO.

BEPS concern is not confined to the BESS. Sub-Site 1B would contain high-voltage transformers and switchgear associated with both the National Grid Substation and the 400kV Project Substation. The Flood Risk Assessment and Drainage Strategy confirm that only outline drainage arrangements are provided for the National Grid Substation, Project Substations and BESS areas, with detailed design to follow. Firewater runoff would be contained, tested and

tankered off-site if required. We would submit that this is a significant deferral of core safety and pollution-control information.

The DCO should not be made unless emergency access, firefighting water volumes, hydrant or water-storage provision, appliance access, thermal runaway assumptions, toxic-plume assessment, transformer fire scenarios, PFAS controls, contaminated-firewater containment and emergency response arrangements are all resolved and secured in enforceable requirements.

10.2 Emergency Access and Abnormal Loads

The Transport Assessment identifies the B1134 Station Road as a key access route for the National Grid Substation, the Project Substation in the BESS Site and the Project Substation in Sub-Site 1B. It also confirms that Abnormal Indivisible Load movements would be required to Sub-Site 1B for transformers serving both the National Grid Substation and the 400kV Project Substation, with the final number of movements deferred to the Construction Traffic Management Plan.

We would submit that abnormal-load access, transformer delivery, road safety, escorting, structure checks, emergency access and highway resilience are not minor construction details. They are central to whether Land Parcel 1 can safely accommodate the proposed infrastructure and should be fully assessed and secured before consent.

10.3 Rail Constraint

The Great Eastern Main Line lies close to the western part of Site 1, with the local highway network including the B1134 Station Road and a level crossing to the west. Chapter 5 also confirms that railway infrastructure was treated as a constraint in alternative substation siting.

We would be concerned that the Applicant has not provided a clear Land Parcel 1-specific assessment of rail interface risks, including construction traffic near level crossings, abnormal-load routing, emergency access during a fire or electrical incident, smoke-plume effects, safeguarding requirements and the status of any Network Rail protective provisions. These matters should be resolved before the acceptability of Site 1 / Sub-Site 1B is concluded.

10.4 Aviation Safety and Glint / Glare

BEPS recognises that glint and glare are relevant to road safety, residential amenity and aviation activity. Aviation receptors include Seething Airfield, Long Stratton Airfield, Hardwick Airfield, Topcroft Farm Airfield, Nut Tree Farm Airfield and Norfolk Gliding Airfield. Chapter 18 records consultation on glint and glare, EFATO and thermal updrafts, and notes concerns from aviation stakeholders including the General Aviation Awareness Council and Seething Airfield.

For Land Parcel 1, these matters are material because Site 1 forms part of the western infrastructure cluster, including solar panels, new overhead-line works, pylons, major substations and associated construction activity. We would submit that the Applicant has not demonstrated, on a Land Parcel 1-specific basis, that cumulative aviation safety effects have been fully assessed.

Where the site lies within or near any EFATO safeguarding area associated with Tibenham Airfield or other aviation receptors, the Applicant should be required to demonstrate that emergency landing corridors, glint and glare, reflective surfaces, construction activity, tall structures, airflow, thermal effects and operational safety have been properly assessed and agreed with relevant aviation consultees.

11. Overall Position

BEPS would submit that the safety case for Site 1 / Sub-Site 1B remains incomplete. The concentration of BESS-related infrastructure, substations, transformers, overhead lines, pylons, access routes, drainage systems and abnormal-load requirements creates cumulative risks that cannot lawfully or safely be left to broad post-consent controls.

Until emergency access, fire response, firewater containment, transformer fire scenarios, abnormal-load routing, rail interface risks and aviation safeguarding are fully assessed and secured, We would submit that limited weight should be given to the Applicant's deliverability case for the Site 1 / Site 1D grid hub.

It is submitted that Land Parcel 1 / Sub-Site 1B has not been lawfully or transparently justified as the location for the principal grid hub of the East Pye Solar scheme. The Applicant's own ES confirms that the Scheme includes multiple 400kV and 132kV Project Substations, Grid Connection Infrastructure and a new National Grid Substation, with the National Grid Substation proposed within Sub-Site 1B.

This makes Land Parcel 1 materially different from the other solar sites. It is not simply land for panels; it is the point at which the Scheme's most intensive infrastructure would be concentrated, including the National Grid Substation, Project Substation, overhead-line reconfiguration, tower works, cable corridors, construction access, abnormal-load movements and operational infrastructure. The Applicant's transport material confirms that Sub-Site 1B would receive abnormal-load transformer deliveries for both the National Grid Substation and the 400kV Project Substation.

In We would 's submission, this is where the Scheme's cumulative impacts crystallise. Noise, lighting, traffic, 24-hour operational presence, security fencing, heavy plant, cable trenching, tower removal and replacement, transformer deliveries, residential amenity impacts, landscape effects and land-acquisition pressures all converge here. Yet the Applicant has not provided a focused cumulative-impact assessment for Great Moulton / Land Parcel 1 reflecting that exceptional concentration of infrastructure.

Nor has the Applicant provided a sufficiently neutral alternatives appraisal. Chapter 5 recognises that reasonable alternatives must be described with the main reasons for the chosen option, taking account of environmental, social and economic effects. However, the choice of Sub-Site 1B is presented largely as a constrained outcome following the rejection of Norwich Main and a subsequent search along the Bramford–Norwich 400kV line. That does not demonstrate that this location is the least harmful or most appropriate site for a major rural grid hub.

We would further object that the Applicant relies on a flexible and deferred design envelope for critical infrastructure, including the National Grid Substation, Project Substations and Grid Connection Infrastructure. Flexibility may be acceptable for limited detailed design matters, but not where it prevents affected residents from understanding the likely effects of the Scheme's most intensive infrastructure on their homes, village, access, landscape, amenity and safety.

We would therefore submit that Land Parcel 1 / Sub-Site 1B is a cumulative-impact choke point. Multiple scheme elements depend upon it, multiple electrical and cable routes converge there, and multiple environmental, residential, transport, safety, agricultural and land-rights impacts are concentrated there. The failure properly to assess and justify this location undermines the coherence and deliverability of the wider Scheme.

The Planning Inspectorate should require the Applicant to provide a full alternatives and cumulative-impact assessment for Land Parcel 1 / Sub-Site 1B, including the National Grid Substation, Project Substation, overhead-line works, cable corridors, BESS-related safety interactions, abnormal-load access, operational lighting, noise, residential amenity and land-acquisition effects. Until that evidence is provided, reduced weight should be given to the

Applicant's claimed acceptability of this location, and the case for compulsory acquisition, protected-species licensing and overall deliverability should be treated as unproven.

AI Disclaimer: my submissions are based on research undertaken by multiple human research teams. Given the scale of the East Pye Solar application, the volume of documentation and the extent to which issues overlap across environmental, technical, legal and planning topics, BEPS also uses a closed-project bespoke GPT as a research and analytical tool.

The GPT is used to bring together and cross-reference research already undertaken by the BEPS human research teams; to identify connections between topics and evidence across the application; and to assist in analysing that material alongside Planning Inspectorate documents, pre-examination and examination material, evidence from statutory consultees, relevant guidance and best practice, and peer-reviewed research. Its purpose is principally to enable systematic cross-referencing across a documentary record of a scale that would not be practicable to analyse comprehensively by manual methods alone.

AI is not used as a substitute for human judgement or responsibility. Submission documents are compiled, reviewed, edited and checked by human members before submission. Sources and evidential propositions are checked wherever material to the argument, and determines which arguments and conclusions are advanced.

I accept responsibility for the contents, accuracy and arguments contained in its submissions. The use of AI is therefore an analytical and document-management aid within a human-led research and review process, rather than an independent author or source of evidence.