

## **East Pye Solar NSIP (PINS Reference: EN0110014)**

To: East Pye Solar (Island Green Power)  
info@eastpyesolar.co.uk

**Date: 24 July 2025**

**From: Great Moulton Parish Council**

**Address:**

Dear Sir/Madam,

We wish to preface my formal objection to the PEIR by explaining that I object fundamentally to the East Pye Solar NSIP because there are already adequate solar energy and BESS projects either built, under construction or in planning to meet DESNZ's CP2030 and CP2035 targets for East Anglia (OFGEM 'TM04+ Impact Assessment', April 2025; NESO 'Connections Reform Data Impact Assessment', December 2024). As such, the East Pye Solar project is not essential to fulfil national renewable energy objectives. Indeed it would unnecessarily take up capacity on the transmission grid which will be required for other types of required generation, and result in curtailment costs.

The extreme and wide-ranging harms posed by this scheme—to the landscape, community, wildlife, farmland, and nationally significant heritage—are not justified by any demonstrable critical need for it. This proposal represents an unjustifiable assault on rural Norfolk that fails to balance national policy with local environmental protection.

### **Legal Basis for Procedural Objection**

According to Section 55(3) of the Planning Act 2008, an application must include documents and information in accordance with statutory requirements. Schedule 4 of the Infrastructure Planning (EIA) Regulations 2017 requires a description of likely significant effects and adequate baseline data to inform statutory consultation under Section 47 of the Act.

### **Key Procedural Failings in the PEIR**

- The PEIR does not justify any evidenced need for the scheme either in this specific location or in relation to CP2030 or 2035 regional targets or the latest NESO and Ofgem data which demonstrates a clear oversupply of both BESS projects and solar in the East of England region (NESO 'Connections Reform Data Impact Assessment', December 2024; OFGEM 'TM04+ Impact Assessment', April 2025). (PINS SO 2.2.2)

- The PEIR defers crucial environmental survey data (e.g. for great crested newts, skylarks, lapwings, turtle doves, and bats), preventing meaningful assessment of ecological impact and breaching Schedule 4(1) of the EIA Regulations.
- No detail is given of the capacity, technology or design of the BESS (contrary to PINS SO 2.1.2). No Outline Battery Safety Management Plan (OBSMP) is provided, despite the known fire and pollution risks of large-scale BESS installations. This contravenes CDM2015, EIA Regs Schedule 4(8) and NPS EN-1 §4.11 on major accident risk assessment.
- Project lifetime impacts on human health are not adequately described nor cross-referenced across chapters (PINS SO 3.11.1)
- The PEIR omits any mapping or risk appraisal of the high-pressure gas main, water mains, railway line, or Source Protection Zones, which is necessary for assessing infrastructure safety and water contamination risks. This undermines compliance with EN-1 §4.11 and EIA Regs Schedule 4(8).
- No cumulative impact assessment includes adjacent or overlapping solar/BESS projects (e.g. Tasway Energy Park, High Grove, The Drovers), contrary to NPS EN-1 §4.2.5, EIA Regs Schedule 4(5) and PINS Scoping Opinion requirement 3.21.2; 3.21.3
- There is no complete Land Management Plan or Soil Management Plan, and no detailed operational land use strategy. This impedes assessment of long-term impacts on Best and Most Versatile (BMV) agricultural land. There is no decommissioning plan to restore the soil quality (PINS SO 3.20.3 and 2.1.9)
- Water-Framework Directive (WFD) screening is needed for ditch & River Tas crossings. The PEIR contains no WFD screening or assessment contrary to PINS SO 3.2.4. An assessment of Private Water Supplies and impacts on them is incomplete and inadequate for statutory consultation (PINS SO3.2.5)
- EMF effects on fish & bats (400 kV export cable at Hempnall Beck) is missing. (PINS SO 3.4.1 & 3.15.17)
- The PEIR does not provide specific design parameters for the Horizontal Directional Drilling (HDD) works proposed for cable installation, nor does it adequately assess whether HDD alignment is likely to encounter groundwater bodies or aquifers (PINS SO 2.1.5)
- Materials, waste and arisings have not been described (PINS SO 3.9.1)
- Full Flood-Risk Assessment incl. 0.1 % AEP test + sequential/exception tests. No FRA outputs provided; contrary to PINS SO 3.2.3 and EA comment FR1
- ALC for cable-route corridor is missing. Only on-site Grade 3 land is assessed; cable route omitted (PINS SO 3.20.3)
- Night-time lighting & dark-skies assessment. Lighting impacts are missing despite PINS SO 3.14.6.

- Construction-phase glint/glare & equestrian safety not assessed (PINS SO 3.6.1). Acceptability of Glint and Glare has not been agreed by Aviation stakeholders.
- Decommissioning noise & vibration (heritage) is omitted (PINS SO 3.18.3)
- Invasive-species plan & biosecurity is missing (PINS SO 3.15.14)
- BNG metric is missing completely. Watercourse biodiversity-net-gain metric is also missing. Environment Agency wants BNG for River Tas – comment FBG9
- Public Rights of Way severance metrics & bridleway safety. Impacts on PRow users underestimated (PINS SO 3.6 & equestrian glare)
- Further UXO survey commitment for RAF Hardwick/Tibenham sites was requested however, no commitment to intrusive UXO surveys despite ‘moderate–high’ risk flagged in PINS SO 3.3.2 (RAF Hardwick consists of both sites 3a and 3b – Heavy Bomb dump was on 3b).
- There is no evidence of effective public engagement under Section 47 of the Act, as the PEIR lacks the detail needed for informed community consultation—particularly regarding visual impacts, transport disruption, BESS risk, and water use.

### **Complaint about Community Engagement**

We would also like to bring to your attention that many residents across multiple parishes, including elderly and vulnerable parishioners, have been receiving letters from East Pye Solar’s land agent, Dalcour Maclaren, informing them that their property ‘may be required’ for this project.

The letters provide no indication of exactly why their property may be needed or whether this is on a temporary or permanent basis. This is causing enormous distress and anxiety to residents and has been reported extensively in national and local press (‘Domesday villagers face being forced to sell homes to make way for UK’s biggest solar farm’, *Daily Express*, Mon, Jun 9, 2025; ‘Britain’s biggest solar farm threatens Domesday villages’, *Telegraph* Mon, Jun 9, 2025). Despite this, neither East Pye Solar nor Dalcour Maclaren have provided any reassurance to individual residents.

The residents have been contacted multiple times by post and by telephone. The situation has become so distressing that Hempnall Parish Council has passed a motion to report the issue to the Police as causing Harassment, Anxiety and Distress.

This project should have been planned from the start to avoid these kinds of impacts on private residents and their properties. This is an entirely inappropriate and disrespectful way to treat the local community and their private homes.

Yours faithfully,

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