

I object strongly to the application for development consent. The plans would industrialise thousands of acres of South Norfolk countryside, cutting a roughly 15 km east-west swathe from the eastern end near Hedenham through to the grid connection near Great Moulton. No solar farm of this size and geographic spread has yet been built in this country. The harm to our heritage, rural tranquillity, local economy, the everyday lives and wellbeing of residents, the loss of good agricultural land and the threats to important wildlife habitats would be permanent, whatever decommissioning promises are made.

An overwhelming majority of residents have voted against the scheme. There is real concern and anxiety about what it would mean for people living here.

The applicant's own Statement of Need admits that prioritised schemes already meet the relevant Clean Power 2030 regional solar capacity ranges. Solar power is a highly inefficient way of generating electricity. Over the long term it is estimated to be only around 10% efficient, and it is unlikely that the stated peak generating capacity of 500 MW will ever be achieved even under ideal conditions. A huge area of countryside, including valuable agricultural land, would be lost for comparatively little output. In context, the power generated – quite apart from its intermittency – would be wholly insufficient to power a large AI data centre. The battery storage element has only Gate 1 prioritisation and no confirmed connection date, yet the applicant keeps relying on the benefits of co-located storage. Without that storage the project offers little flexibility and is likely to face expensive constraints.

The harms are very much tied to this specific location. The applicant has chosen a dispersed rural landscape of high ecological value, with connected water systems, protected species, heritage assets, aviation constraints, homes and extensive best and most versatile farmland that has been managed for conservation with public money. These are not ordinary solar impacts. They come directly from the siting and design of this scheme. Where a project causes severe and in some cases legally protected harm, vague references to national need or "optionality" are not enough. The applicant must show that the scheme is needed here and that the harms can lawfully be mitigated. It has not done so. This also weakens the case for compulsory acquisition. If the scheme is just one of several optional projects in an already sufficient regional pipeline, the interference with private property rights cannot be regarded as necessary or proportionate. The scheme may well prove lucrative for the applicant and for some local landowners, but there are no material benefits for the residents who would have to live with it and the construction of it. Local businesses, especially those linked to tourism, would be damaged both during construction and throughout the operational life of the project. There are no specific proposals for properly compensating those businesses, or for homeowners whose properties would be devalued and harder to sell.

Appearance of bias – DESNZ and Macquarie-

I am seriously concerned by the appearance of bias arising from the Department for Energy Security and Net Zero's private meeting with Macquarie on 27 January 2025 about regional transmission grid connections and a "deep-dive" on this project (NESO FOI-25-240; DESNZ EIR2026/03951; IC-429804-X4Y8). The Secretary of State, acting through DESNZ, has a quasi-judicial role in deciding whether consent should be granted. That role requires both actual and apparent impartiality. A fair-minded observer could reasonably question whether the department has kept proper separation between policy facilitation, commercial delivery and its later decision-making function, especially when grid connection and claimed need sit at the heart of the applicant's case. Full disclosure of the nature and content of all such meetings is needed, along with clear procedural safeguards to make sure the decision is not tainted by apparent bias. The Examining Authority should require a statement explaining how the Secretary of State's decision-making function will be kept separate from any earlier DESNZ involvement with this project.

European protected species and Habitats Regulations-

The ecological issues are among the most serious. The scheme affects an area of exceptional importance for bats, including barbastelles, which are European Protected Species and highly sensitive to habitat loss, severance, lighting, noise and disturbance. Treating bat impacts as something that can be managed by keeping isolated hedgerows or applying generic buffers is simply not good enough in a landscape where multiple barbastelle maternity colony core sustenance zones overlap the scheme area and cable corridor. The real issue is the loss and disturbance of a functional dark landscape used for commuting, foraging, roosting and population movement. Construction disturbance, habitat fragmentation, lighting and noise are intrinsic to the scheme and cannot be reduced to a level that avoids adverse effects that can be satisfactorily mitigated. The scheme is therefore fundamentally incompatible with the Habitats Regulations. If favourable conservation status cannot be secured, the scheme cannot lawfully go ahead.

Evidence of white-clawed crayfish within the connected catchment of the Tas chalk-stream system, within 2 km of the scheme, was given to the applicant by the Norfolk Rivers Trust before the application was submitted. It has not been included. The applicant cannot rely on assumptions of absence or on surveys done when streams and ditches were dry. Any works that could affect the Tas or its tributaries must be assessed on a precautionary basis, including Water Framework Directive compliance and protected species implications.

The Habitats Regulations screening seems to conclude there will be no likely significant effects despite clear hydrological and ecological connections. That position is not precautionary enough. Uncertainty cannot be treated as proof of no effect. These are legal gateway issues, not ordinary planning-balance points. Unless the applicant can show on solid evidence that European protected species will not be unlawfully harmed and that there will be no adverse effects on protected sites, the scheme cannot lawfully proceed.

Water Framework Directive, chalk streams and private water supplies

The scheme sits across a sensitive, interconnected hydrological landscape of chalk streams, field ditches, tributaries, groundwater pathways, private water supplies and private sewerage. Construction, contamination, sediment, dewatering, piling, drainage changes and operational run-off all have the potential to affect these systems. Chalk streams are rare and highly sensitive; harm to their hydromorphology, water quality or ecology may be irreversible. The applicant must show that the scheme will not cause deterioration in the status of any relevant water body and will not prevent the achievement of environmental objectives. Outline management plans and future detailed design are not enough for a legal gateway test.

Private water supplies remain a particular worry. Potentially active supplies have been identified, yet there is no robust, receptor-specific risk assessment. This is a public health issue as well as an environmental one. Sites 1 (Great Moulton

infrastructure hub) and 5 (project substation) are especially problematic: both are hydrologically connected to chalk streams and surrounded by private water supplies and private sewerage that have not been assessed at all. The Great Moulton hub would place major permanent grid infrastructure on an exposed rural plateau close to sensitive receptors, Tibenham Airfield and the Waveney chalk-stream catchment. The evidence suggests a land- and grid-led selection process rather than an environmentally driven one.

Contamination and former airfields

Parts of the scheme lie on or near former military airfield land and other potentially contaminated sites. Construction could mobilise contaminants into groundwater, private supplies, ditches, streams or chalk aquifers. Where contaminated land, shallow groundwater, chalk geology and sensitive receptors coincide, the risk is high. These matters must be assessed before consent is granted, not left to later investigation once the principle of development has been accepted.

Best and most versatile agricultural land

The scheme would take a very large area of Grade 2 and Grade 3a Best and Most Versatile land out of productive use for a substantial period. Around

80% of the land proposed for solar fields is BMV. Long-term solar deployment can affect soil structure, drainage, compaction and future agricultural viability. The claimed reversibility of the scheme is not proven: the applicant has not shown what infrastructure will be removed, how soils will be restored or how land will be returned to productive use. The March 2026 Land Use Framework for England underlines the importance of protecting productive agricultural land and food security. On this basis the proposal should be judged contrary to policy.

Cultural heritage, landscape and residential amenity-

This is a sensitive historic landscape of national importance for the quality and quantity of its pre-1750s rural architecture, with over 300 listed buildings in the zone of influence. Large-scale solar arrays, substations, fencing, CCTV, access tracks and lighting would erode the settings of those assets. The statutory duty to have special regard to the desirability of preserving listed buildings and their settings is engaged. The impacts would be felt cumulatively across villages, lanes, public rights of way and homes. Visual and landscape effects have been understated, relying on limited or seasonally unrepresentative viewpoints. Residential amenity impacts – outlook, noise, construction traffic, glint and glare, loss of tranquillity and cumulative enclosure – have likewise been underplayed. For those of us who live here, these are not abstract issues; they would change the character of the area.

Aviation safety – Tibenham and Seething

Unresolved aviation concerns remain, particularly in relation to Tibenham Airfield and Seething Airfield. Site 10 intrudes into the Seething Airfield Safety Zone. While the applicant has partially addressed this by reducing the area of panels in sub-Site 10B (APP 223), a large area of panels would still remain. That presents a serious danger should a light aircraft lose power on take-off from the airfield. For this reason alone, sub-Site 10B should be removed from the scheme. Tall or visually intrusive infrastructure in areas where aviation safety, emergency landing, glare and operational constraints require careful assessment has not been properly integrated into site selection.

The cumulative assessment of other major energy and infrastructure projects, including Tasway, is inadequate and does not show the true landscape extent or cumulative burden on communities, ecology, water systems, aviation and the grid.

Construction disruption-

The significant impacts on local residents of the construction phase have been downplayed. Two years of construction activity involving numerous HGV movements along narrow rural lanes will cause massive disruption. Harvey's Lane is a primary route for local traffic travelling to and from the B1332 towards Norwich and already suffers from the passage of large tankers accessing the nearby biowaste lagoons. As a designated route for HGVs during the construction of Site 10 we can expect severe access problems, including the possibility of prolonged road closures.

Consultation and procedural fairness-

There has been widespread disappointment with the consultation process and a strong sense of inevitability about the ultimate approval of the application, with little apparent sympathy for local residents. The consultation has felt like a box-ticking exercise focused on producing reams of paperwork to cover the many NSIP requirements, including desk-driven impact analyses that play down the detrimental effects of the scheme while claiming benefits that are unlikely ever to materialise. The scheme evolved over time, bringing new parishes, residents and land interests into scope through targeted consultation. Many affected people were not given a fair opportunity to understand and respond to the true impacts. The application material is complex, voluminous and in places inaccessible. Key plans are difficult to interpret without specialised software. A recurring defect is the unlawful deferral of essential matters – outline plans, future surveys, later licences, drainage details, construction controls, decommissioning arrangements and ecological mitigation – until after consent. That approach is unacceptable where the unresolved issues go to legal compliance, public health, protected species, Water Framework Directive duties, aviation safety and the basic deliverability of the scheme.

Site 9 – specific objection

I object specifically to the inclusion of Site 9. It adjoins Brooke Wood, lies within a nationally important barbastelle landscape, affects rural tourism businesses, raises heritage and access concerns, and sits within a sensitive water and ecological network. These are front-loaded constraints that cannot be cured by later management plans.

The Norfolk Barbastelle Study Group's 2025 survey work predicted the presence of barbastelle maternity colonies in the mature oak belt in Brooke Wood. Acoustic surveys recorded barbastelle calls on all nights in July on both east and west sides, with the threshold of four calls in the hour after sunset reached on four nights, peaking at 15 calls. Further radio-tracking is needed. Construction, fencing, panels, cabling, lighting, noise and long-term habitat severance would affect functionally linked habitat next to a woodland where maternity-colony presence is predicted.

Access routes and cable corridors serving Site 9 support rare botanical assemblages, yet no adequate full-season botanical survey has been carried out despite proposals for road widening. An ancient hedgerow on Site 9 has already been removed during the nesting season and an ancient ditch filled without permission.

Site 9 lies in a chalk-stream and chalk-aquifer catchment with hydrological connectivity to the River Tas, private sewerage and vulnerable water receptors. Impacts on private sewerage have not been assessed. Parts of the site lie in Flood Zone

3.

The land parcel lies within the setting of multiple listed buildings, historic farmsteads and the Brooke–Kirstead Conservation Area. Established rural tourism and holiday-let businesses – including Waterfield Cottage, Brooke View Barns, Wood Farm, Waldor Cottage and nearby properties – depend on the very qualities the scheme would destroy. The

economic harm would be permanent.

Access depends on narrow, single-track rural lanes with poor alignment and no passing places. These routes are unsuitable for HGVs or Abnormal Indivisible Loads. Any attempt to upgrade them would itself cause unacceptable harm. If safe access cannot be demonstrated without such works, the site is not deliverable.

The scheme fails the planning balance. There is no demonstrated compelling need for East Pye Solar in this location.

Less harmful alternatives have not been properly assessed. Legal gateway issues relating to protected species, the Habitats Regulations, the Water Framework Directive, private water supplies, contamination, heritage protection, aviation safety and procedural fairness remain unresolved. The most serious harms are not capable of adequate mitigation.

I therefore ask the Examining Authority and the Secretary of State to refuse development consent. If any part of the application is to proceed further, it cannot lawfully do so without further environmental information, corrected assessment, re-consultation where necessary, and enforceable safeguards. At a minimum this must include a lawful alternatives assessment, complete ecological surveys (including botany, white-clawed crayfish and bats), a robust Habitats Regulations assessment, Water Framework Directive compliance assessment, hydrogeological and private water supply risk assessments, contamination pathway modelling, corrected cumulative assessment, representative visual material, aviation safety assessment acceptable to Tibenham Airfield, Seething Airfield and the GAAC, enforceable decommissioning and restoration security, and full disclosure of DESNZ/Macquarie engagement.

For the reasons set out above, East Pye Solar is not an acceptable or lawful development in its present form. I strongly request that Site 9 and sub-Site 10B be removed from the Order Limits in any event.