

Written Representation

East Pye Solar — Development Consent Order Examination

Planning Inspectorate Reference: EN0110014

Submitted by an Interested Party

Name: Victoria Kirk

Address: [REDACTED]

Interested Party Reference: [REDACTED]

Date: 28/09/2026

1. Introduction

I am a registered Interested Party in the examination of the application by East Pye Solar Limited for a Development Consent Order (EN0110014).

I live at [REDACTED], within the area directly affected by the proposed scheme, and I make this representation in that capacity.

My concerns relate principally to the potential effects of artificial lighting and the loss of rural night-time darkness. These include:

1. the direct impact of construction and operational lighting on my property and my use of it for astronomical observation and photography;
2. the reliability and enforceability of the Applicant's proposed motion-sensor lighting controls;
3. the treatment of Seething Observatory as a lighting-sensitive astronomical receptor;
4. the relevance of the Seething Observatory & Airfield County Wildlife Site;
5. the potential cumulative effect of artificial lighting and sky glow from East Pye Solar together with other existing, consented and proposed infrastructure; and
6. the need for adequate controls over night-time construction lighting, including lighting associated with HDD and other cable works.

I recognise the importance of renewable energy development and the wider objectives of the proposed scheme. My concern is that the night-time environment should be properly assessed and protected, particularly where the Applicant's own documents recognise the sensitivity of the surrounding rural landscape to artificial light.

2. My Personal Impact: Proximity, Dark Skies and Astronomical Observation

My property lies approximately 1.5–1.6 km from Site 6 and Site 5B, and approximately 1.8 km from Site 5A.

More significantly, the Applicant's own Environmental Statement, Volume 1, Chapter 3: The Order Limits [APP/6.1.3], records the proximity of elements of the scheme to Hempnall, including:

- Cable Route Corridor 6, linking Site 3 to Sites 5 and 6, approximately 250 m north of Hempnall;
- Cable Route Corridor 7, linking Sub-Site 5B to Sub-Site 7B, approximately 130 m east of Hempnall; and
- Site 6, where residential properties border the site along both its eastern and western boundaries.

I own and use telescopes from my property for astronomical observation and photography, including observing and photographing constellations. This is an established recreational use of my property which depends upon reasonably dark skies and freedom from intrusive artificial light.

The Applicant's own Lighting Strategy, ES Volume 3, Appendix 7.11 [APP/6.3.7.11], identifies the surrounding area as an E2 "Rural" Environmental Lighting Zone. The wider landscape is also identified as a Rural Dark Landscape.

This is important because intermittent artificial lighting can have a disproportionate effect on astronomical observation and photography compared with its apparent effect on general visual amenity.

For example, a security light activating during a long exposure, or visible lighting associated with a construction compound or cable works, could significantly degrade or ruin an astronomical image even where the same brief illumination might be regarded as only a minor visual disturbance to a passing member of the public.

I therefore ask the Examining Authority to ensure that the assessment does not treat lighting solely as a conventional visual-amenity issue. The night-time environment itself is a receptor, and astronomical observation and photography provide a real existing use which is particularly sensitive to intermittent artificial light.

I respectfully ask that construction and operational lighting effects on dark-sky amenity and astronomical observation be specifically considered for residents in close proximity to construction compounds and cable route works, including Hempnall.

3. The Applicant's Lighting Commitments Should Be Made Verifiable

The Applicant's Lighting Strategy contains commitments concerning the design and control of artificial lighting.

However, given the sensitivity of the surrounding rural environment, I consider that commitments should be sufficiently specific and enforceable to allow their effectiveness to be verified in practice.

In particular, controls should address:

- the timing of lighting;
- the duration for which lighting may remain illuminated;
- light spill beyond the Order Limits;
- shielding and direction of light fittings;
- illumination levels;
- automatic controls and their settings;
- maintenance and testing of lighting controls; and
- procedures for investigating complaints about intrusive lighting.

A general commitment to minimise lighting is less useful if there is no objective means of establishing whether the lighting installed and operated on the ground complies with that commitment.

I therefore ask that any lighting commitments relied upon by the Applicant be secured through the DCO or associated requirements in a form that can be objectively monitored and enforced.

4. Reliability of Motion-Sensor Lighting Controls

The Applicant's Lighting Strategy states that security and access lighting will be controlled by motion sensors, with sensitivity "adjusted to ignore minor heat signatures (i.e. wildlife) to prevent accidental activation of the light fittings."

I have concerns about the reliability of this safeguard as currently described.

First, the term "minor heat signatures" is not defined. It is therefore unclear what range of animals or movement the system is actually intended to ignore.

The surrounding rural landscape contains wildlife considerably larger than small mammals and birds. Animals such as deer, badgers and foxes could potentially produce movement and heat signatures that are more substantial than those of the small fauna apparently contemplated by the wording.

Second, I have not identified a specific calibration standard, testing methodology, or monitoring and reporting mechanism which would allow the effectiveness of the sensor settings to be independently verified following installation and during the operational life of the scheme.

Third, false activation of lighting is particularly relevant at night. It is precisely during the hours when wildlife is active that astronomical observation and the enjoyment of dark skies are also most likely to take place.

I therefore ask the Examining Authority to require the Applicant to specify:

1. how motion sensors will be calibrated;
2. what types and sizes of wildlife the system is designed to exclude;
3. how the calibration will be tested before the lighting system becomes operational;
4. how the settings will be checked and maintained throughout construction and operation; and
5. how complaints or evidence of repeated false activation will be recorded, investigated and addressed.

A tested and verifiable control would provide considerably greater confidence than a general statement that sensors will be adjusted to avoid wildlife activation.

5. Seething Observatory as an Astronomical Lighting Receptor

I also ask the Examining Authority to consider the treatment of Seething Observatory, operated by the Norwich Astronomical Society, as a lighting-sensitive receptor.

I raise this as a concerned Interested Party citing publicly available information. I do not submit this representation on behalf of the Society.

Seething Observatory is situated close to Sites 9 and 10 of the proposed development and is used for astronomical observation.

The Applicant's Environmental Statement does recognise Seething Observatory elsewhere within its assessment material, including within the visual baseline. My concern is therefore more specific: that the Observatory does not appear to have been carried through into the Applicant's specific lighting assessment as an astronomical/light-sensitive receptor in the same way that other sensitive receptors have been considered.

This distinction is important.

An observatory is not simply another residential or visual receptor. Its purpose depends directly upon darkness and the avoidance of intrusive artificial light. Direct illumination, glare, light spill and wider sky glow can all potentially affect its use.

I therefore ask the Examining Authority to require the Applicant to clarify:

1. whether Seething Observatory has been assessed as a lighting-sensitive astronomical receptor;
2. if it has been assessed, where that assessment is contained within the Environmental Statement and associated appendices;
3. what baseline night-sky conditions were assumed;
4. whether direct illumination, glare, light spill and sky glow were considered separately; and
5. what mitigation is proposed to ensure that the Observatory is not adversely affected by lighting from the Scheme.

This would provide a clearer and more transparent assessment of an existing astronomical facility located within the wider area of the proposed development.

6. Seething Observatory & Airfield County Wildlife Site

There is a further reason why the Observatory warrants specific consideration.

The Seething Observatory & Airfield is identified as County Wildlife Site 2057.

The Applicant's Lighting Strategy recognises County Wildlife Sites as a category of potentially lighting-sensitive ecological receptor. I therefore ask the Applicant to clarify how CWS 2057 has been treated within its ecological and lighting assessments.

In particular, I ask the Examining Authority to require confirmation of:

1. whether CWS 2057 was included within the ecological baseline and assessment work;
2. whether the potential effects of artificial lighting on the designated site were assessed;
3. whether the proximity of Sites 9 and 10 was taken into account; and
4. whether any additional mitigation is considered necessary to prevent artificial lighting affecting the ecological function of the site.

This is a separate issue from the Observatory's use as an astronomical facility, and both aspects should be considered.

7. Cumulative Lighting and Sky Glow

I am also concerned that the assessment of lighting effects should consider the cumulative effect of the proposed Scheme alongside other existing, consented and proposed infrastructure in the surrounding area.

The East Pye Solar Environmental Statement contains cumulative assessments across a number of technical disciplines and identifies other major energy and infrastructure developments in South Norfolk, including grid connection works associated with Hornsea Three and the proposed Norwich–Tilbury connection.

I am concerned, however, that the cumulative effect of artificial lighting and night-sky brightness may not have been considered with the same level of specificity.

This is important because the effect of artificial lighting on a dark rural landscape is not necessarily confined to the immediate footprint of an individual development.

Sky glow, illuminated compounds, substations, access roads, security lighting and other sources of artificial light can combine to alter the character of the night-time environment over a much wider area.

There are already examples of substantial energy infrastructure in the wider area where artificial lighting is visible at night. In my own experience, the large substation/infrastructure development between the A140 and A47 is a particularly noticeable example of artificial lighting within an otherwise rural landscape.

I do not suggest that the lighting from that development is necessarily attributable to East Pye Solar, nor do I seek to make a separate objection to that development. I raise it because it demonstrates the existing context in which East Pye Solar would be introduced and the potential for successive infrastructure projects to incrementally change the night-time environment.

This is particularly relevant to the Rural Dark Landscape identified by the Applicant itself and to the E2 Rural Environmental Lighting Zone applying to the area.

I therefore ask the Examining Authority to require the Applicant to clarify:

1. whether cumulative artificial lighting and night-sky effects have been assessed alongside other existing, consented and proposed major infrastructure projects in the surrounding area;
2. which existing and proposed developments have been included within that assessment;
3. whether the assessment considers cumulative sky glow as well as direct illumination and light spill;
4. whether existing sources of artificial light have been established as part of the baseline against which the Scheme's additional lighting effects have been assessed; and
5. what measures will be used to ensure that the Scheme does not make a disproportionate contribution to the progressive loss of rural night-time darkness in the area.

If cumulative lighting effects have not been assessed, I respectfully ask that the Applicant be required to provide such an assessment before the examination is concluded.

The incremental effect of an individual development may appear limited when considered in isolation. The cumulative effect of multiple large-scale energy and infrastructure projects on the rural night-time environment may, however, be materially different.

8. Night-Time Construction Lighting and HDD Works

I am particularly concerned about lighting during construction.

The Applicant's construction activities will include cable route works and trenchless crossings, including HDD works. Such activities have the potential to require temporary lighting, plant lighting, security lighting and other sources of artificial illumination.

Temporary lighting can nevertheless have a significant effect on nearby properties and on astronomical observation, particularly where lighting is intermittent or visible from a distance.

I therefore ask that the Applicant's construction lighting controls specifically address:

1. the circumstances in which night-time lighting may be required;
2. the minimum lighting necessary for safety and operational purposes;
3. the use of directional and shielded fittings;
4. prevention of light spill towards residential properties and sensitive receptors;
5. automatic switching-off when lighting is no longer required;
6. restrictions on unnecessary overnight illumination;
7. the treatment of emergency lighting;
8. lighting associated with HDD and other trenchless works; and
9. a mechanism for residents to report persistent or excessive lighting.

I recognise that there will be circumstances, especially in the winter months where night-time working is unavoidable. I am not seeking to prevent lighting that is reasonably required for legitimate safety purposes, engineering or other legitimate reasons, I ask that safety critical lighting associated with any work should be subject to clear limits and incorporating appropriate shielding, Directional Control, automatic controls and switch off arrangements where practicable.

9. Summary of Requests to the Examining Authority

I respectfully ask the Examining Authority to require the Applicant to:

1. Assess the effects of construction and operational lighting on dark-sky amenity and astronomical observation, including the effect on residents in close proximity to construction compounds and cable route corridors such as Hemphall.

2. Secure specific and enforceable lighting controls covering timing, duration, illumination, shielding, light spill and maintenance.
3. Provide a tested and verifiable standard for motion-sensor lighting, including calibration, testing, maintenance and monitoring, with particular consideration of false activation by larger wildlife.
4. Clarify the assessment of Seething Observatory as an astronomical and lighting-sensitive receptor and identify where this assessment is contained within the submitted documentation.
5. Clarify the treatment of Seething Observatory & Airfield County Wildlife Site (CWS 2057) within the ecological and lighting assessments.
6. Provide a cumulative assessment of artificial lighting and sky glow, taking account of existing, consented and proposed major infrastructure in the surrounding area.
7. Clarify the existing night-time lighting baseline, including the extent to which existing sources of artificial light have been taken into account when assessing the additional effect of the Scheme.
8. Secure appropriate controls over night-time construction lighting, including lighting associated with cable works, HDD and other trenchless construction activities.

10. Conclusion

The principal issue I ask the Examining Authority to consider is that the night-time environment should not be treated simply as an incidental aspect of the visual assessment.

The Applicant's own documents recognise the rural and relatively dark character of the surrounding landscape. My property is relatively close to several elements of the proposed development, including cable route corridors approximately 130 m and 250 m from Hempnall.

I use my property for astronomical observation and photography with a telescope, and this existing recreational use is directly dependent upon the preservation of reasonably dark skies.

I am not suggesting that all artificial lighting associated with the Scheme can or should be eliminated. Rather, I ask that the effects are properly assessed, that sensitive receptors are correctly identified, that cumulative effects are considered, and that the mitigation relied upon by the Applicant is sufficiently specific and enforceable to provide meaningful protection.

I respectfully ask the Examining Authority to take these matters into account and to require the Applicant to provide clarification and, where necessary, further assessment before the examination is concluded.

Yours faithfully,

Victoria Kirk

.