

# **SUPPLEMENTARY WRITTEN REPRESENTATION**

## **East Pye Solar — Development Consent Order Examination**

Planning Inspectorate Reference: EN0110014

|                                   |                              |
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| <b>Submitted by</b>               | Victoria Kirk                |
| <b>Address</b>                    | [REDACTED]                   |
| <b>Interested Party Reference</b> | [REDACTED]                   |
| <b>Date</b>                       | 1 <sup>st</sup> October 2026 |

### **Summary**

This Supplementary Written Representation should be read alongside my Written Representation dated 28 September 2026. It asks the Examining Authority to test whether the benefits claimed for East Pye Solar are sufficiently evidenced and attributable to this Scheme, and whether its environmental and long-term liabilities are adequately controlled.

The Applicant's alternatives assessment uses a 20 km search radius centred on a new, project-specific substation which is itself part of the proposed development. I ask whether alternative combinations of connection point, substation location and generating land were assessed, including configurations offering greater use of brownfield, industrial, rooftop, car-park or other previously developed land. I also ask why landowner unwillingness was used to exclude potentially suitable alternatives when compulsory acquisition powers are sought for the chosen Scheme.

The Applicant states that the Scheme will lower consumer bills and improve energy security. I ask that these claimed benefits be quantified and supported by a Scheme-specific methodology before significant weight is attached to them. General benefits associated with renewable generation should be distinguished from benefits demonstrably attributable to East Pye Solar.

Given the Scheme's proposed operational life, I ask for transparency concerning ownership, financing and the safeguards protecting maintenance, environmental and decommissioning obligations if ownership changes or the project company becomes insolvent. Adequate, indexed and independently reviewed financial security should be secured for eventual decommissioning and restoration.

The maximum reasonably foreseeable operational noise from the BESS, inverters, transformers and cooling equipment should be assessed, including tonal, low-frequency and night-time effects. Equipment-location constraints, enforceable noise limits, monitoring and an effective resident complaint mechanism should be secured through the Development Consent Order.

Finally, material decisions concerning lighting, noise, equipment location and residential amenity should not be left unnecessarily to post-consent approval. Where detail remains flexible, the Development Consent Order should contain objective limits ensuring that the final development cannot produce materially greater effects than those assessed during the examination.

### **1. Introduction and Relationship to My Earlier Representation**

I am a registered Interested Party in the examination of the application by East Pye Solar Limited for a Development Consent Order (EN0110014), living at [REDACTED] folk.

I submitted a Written Representation dated 28 September 2026 addressing artificial lighting, dark-sky amenity, Seething Observatory and the associated County Wildlife Site. That submission should be read alongside this Supplementary Written Representation, and not in substitution for it.

This supplementary submission addresses separate matters which I consider material to the examination:

1. the robustness of the Applicant's alternatives assessment;
2. the Applicant's corporate structure, financing and the transparency of its economic claims;
3. operational noise from inverters, transformers and battery storage;
4. long-term financial responsibility and decommissioning;
5. the extent to which material design and impact detail has been deferred to the post-consent stage.

I recognise the importance of renewable energy generation and do not suggest that the matters raised below establish, by themselves, that development consent should be refused. My purpose is to ask the Examining Authority to ensure that benefits

relied upon in the planning balance are evidenced and attributable to this Scheme, and that environmental and long-term public-interest risks are adequately secured before consent is granted.

## **2. Reasonable Alternatives and Site Selection**

The Applicant's Environmental Statement, Volume 1, Chapter 5: Reasonable Alternatives and Design Evolution [APP-041], describes a site-selection process built around a 20 km search radius drawn from the proposed new National Grid substation south of Great Moulton. Within that radius, the Applicant states that it reviewed brownfield registers for South Norfolk, Broadland, Breckland, Mid Suffolk and East Suffolk, found no site of sufficient scale, and identified no commercial rooftop area of comparable scale.

I ask the Examining Authority to test whether the methodology used to identify reasonable alternatives was sufficiently broad to support the conclusion that the proposed site represents a reasonable outcome. My concern is not that the Applicant should necessarily have selected a particular alternative site, but whether potentially suitable categories of land were excluded before they could properly be assessed.

Separate DESNZ regional renewable-electricity statistics provide capacity and generation data for each English region and local authority. Those data are consistent with the UK totals in DUKES, but are the more appropriate evidence for assessing the existing contribution made by the East of England. I ask the Applicant to quantify the East of England's current renewable generation and consented pipeline, and to explain what weight it gave to the cumulative concentration of nationally significant energy infrastructure in this region when defining its alternatives methodology and proposed scale.

This is relevant not because an area that already hosts renewable infrastructure should be exempt from further development, but because the planning balance should recognise the existing regional contribution and should test whether additional capacity could reasonably have been directed towards industrial land, previously developed land, rooftops, car parks or a wider search area before further large areas of productive rural land were selected.

### **2.1 Relationship Between the Proposed Substation and the 20 km Search Area**

The Applicant explains that it initially considered a connection at the existing Norwich Main Substation, but that National Grid Electricity Transmission advised that Norwich Main had neither sufficient existing capacity nor an opportunity for expansion capable of accommodating a 500MW solar project. Capacity was subsequently identified on the existing Bramford to Norwich 400kV overhead transmission line, requiring the construction of a new National Grid Substation. The Applicant received a grid connection offer in October 2022 and entered into a Bilateral Connection Agreement in July 2023. Under that arrangement, the Applicant is responsible for providing the land and obtaining consent for the proposed new substation. The substation is therefore not an existing consented facility, but forms part of the development for which consent is now sought.

I recognise that proximity to the existing 400kV overhead line is a legitimate engineering consideration, and that the Applicant assessed a number of possible substation locations. Chapter 5 records that locations at Newton Flotman, Tasburgh and Long Stratton were initially examined, before the search was expanded to land south of Great Moulton. The Applicant states that the Great Moulton location was preferred because of its proximity to the overhead line and the A140, its accessibility for abnormal loads, and the opportunity to avoid routing construction traffic through residential settlements.

My concern is therefore not that the Applicant considered no alternative substation locations. It is whether the sequence of the assessment has produced an unnecessarily narrow approach to reasonable alternatives. The proposed substation and Point of Connection were selected for the purposes of this particular Scheme and are themselves included within the DCO application. The selected location was then used as the centre of the 20 km search area within which land for the solar development was considered.

I ask the Applicant to explain why a project-specific and currently unconsented element of the Scheme was treated as the fixed geographical origin of the solar-site alternatives assessment. In particular, I ask whether the assessment considered the combined consequences of alternative Point of Connection, substation and solar-site configurations, rather than selecting the connection strategy first and then limiting the search for solar land to the area surrounding it.

I also ask the Applicant to confirm:

1. whether any alternative connection strategy or substation location was assessed on the basis of the access it could provide to industrial, previously developed or lower-impact land;
2. whether industrial estates, existing electricity infrastructure sites, previously developed land or development close to other substantial infrastructure corridors were considered as possible locations for all or part of the grid connection infrastructure;

3. whether alternative substation locations could have enabled a materially different solar-site search area, including greater access to brownfield, industrial, rooftop or solar car-park opportunities;
4. why land outside the 20 km radius was excluded if the substation used as the centre of that radius was itself a proposed and potentially variable element of the Scheme;
5. whether the 20 km radius was tested against any wider search area before being adopted, and what environmental, technical and commercial comparison was undertaken; and
6. whether the cumulative environmental effects of the selected substation, associated overhead-line alterations, cable routes and dispersed solar sites were compared against the effects of alternative integrated configurations.

I acknowledge that industrial or previously developed land may not be capable of accommodating a new 400kV substation or the full generating capacity of the Scheme. However, that possibility should be demonstrated through the alternatives assessment rather than assumed. National policy cited by the Applicant recognises that there will usually be a degree of flexibility in the location of associated substations and that their location and design should be considered carefully. The relevant question is therefore whether the Applicant selected the least harmful reasonable combination of connection infrastructure and generating land, rather than whether the selected substation location is technically capable of operating.

The issue is not whether I can now identify a single alternative site that should have been selected. It is whether the Applicant's methodology was sufficiently broad and integrated to support its conclusion that the proposed configuration represents a reasonable outcome.

## **2.2 Landowner Willingness and the Treatment of Alternatives**

Chapter 5 states that land nearer the grid connection point may be suitable but was not treated as a reasonable alternative because it had not been made available by the landowner. By contrast, the Applicant's Statement of Reasons [APP-020] confirms that Option Agreements are in place with the majority of landowners for the chosen site, while the Applicant nonetheless seeks compulsory acquisition powers as a backstop against an owner later declining to honour an agreement, together with new rights and temporary possession across the Order Limits for cable routes and grid connection.

I ask the Examining Authority to examine whether the different treatment of landowner willingness is justified by a material distinction between the alternative-site assessment and the compulsory acquisition powers sought for the proposed Scheme.

In particular, I ask the Applicant to explain why an unwilling landowner was treated as a sufficient reason to exclude an otherwise potentially suitable alternative, while compulsory acquisition powers are sought in relation to land required for the chosen project. I also ask whether a similar statutory backstop was considered, or could have been considered, in relation to any alternative sites.

## **2.3 Distributed or Reduced-Capacity Alternatives**

The Reasonable Alternatives chapter appears to focus on single, large-scale sites. I have not identified an assessment of a distributed alternative combining multiple smaller sites, rooftop solar and solar car parks.

A regional example is Aviva's Broadland Business Park solar carport in Norwich, built in 2019, which uses a solar carport covering approximately 250 parking spaces and generating approximately 542,000 kWh per year. This example does not demonstrate that distributed solar could replace East Pye Solar, and I do not suggest that it could do so.

The relevance of the example is narrower: it demonstrates that solar generation can be accommodated within previously developed commercial land and car-parking infrastructure. I therefore ask the Applicant to confirm whether a distributed or reduced-capacity alternative was assessed at any stage and, if not, why not, particularly given the preference expressed in national policy for brownfield and previously developed land where practicable.

This question is not intended to suggest that rooftop or car-park solar could necessarily provide equivalent generating capacity. Rather, it is whether a portfolio of smaller, previously developed or lower-impact sites was considered as an alternative to concentrating the proposed generating capacity within the proposed Order Limits.

## **3. Corporate Structure, Financial Transparency and Long-Term Financial Resilience**

East Pye Solar Limited is a project company of Island Green Power. The Applicant's Funding Statement records that Macquarie Asset Management, through managed funds, acquired an initial 50 per cent interest in Island Green Power in 2022 and acquired the remaining 50 per cent in May 2025, bringing Macquarie's ownership of Island Green Power to 100 per cent.

I do not suggest that the identity of the Applicant's ultimate owner is, in itself, a reason to refuse or modify the Development Consent Order. I raise the ownership structure because the proposed Scheme represents long-term infrastructure with an operational life of approximately 60 years, and because the financial structure of the entity responsible for that infrastructure is relevant to its ability to maintain the asset, meet environmental obligations and ultimately fund decommissioning.

There is also a relevant historical context which, in my view, justifies greater transparency rather than assumptions about the Applicant's intentions.

Macquarie Asset Management previously had a controlling investment role in Thames Water between 2006 and 2017. Public evidence concerning Thames Water during and following that period records a substantial increase in debt and significant distributions to shareholders. The precise interpretation of those figures is contested, and Macquarie has publicly disputed the characterisation that its ownership resulted in under-investment or inappropriate financial extraction.

Macquarie's own published account states that Thames Water's regulated asset base increased substantially during its ownership, that the company undertook record levels of investment, and that additional debt was used in part to finance that investment. Macquarie reports debt increasing from approximately £6 billion to £11 billion during the period and describes the company as maintaining an investment-grade credit rating.

Other public evidence gives a different emphasis. Parliamentary reporting has recorded a substantial increase in Thames Water's debt during the period of Macquarie-led ownership and substantial dividend payments to shareholders. The precise starting figures and the treatment of different forms of distribution vary between sources, which is why I present this as contextual evidence requiring a response rather than as proof of how East Pye Solar will be financed.

I do not suggest that Thames Water and East Pye Solar are directly comparable businesses. Thames Water was a regulated water and wastewater utility with a very different operating and regulatory model, whereas East Pye Solar will operate in the electricity-generation sector. Nor do I suggest that the historical experience of Thames Water establishes how East Pye Solar will be financed.

I do, however, consider that history relevant to the questions that should be asked before consent is granted to a project of this scale and duration. A project can be legally and commercially financed through combinations of debt, equity, intra-group financing and shareholder distributions while still raising legitimate questions about whether sufficient capital and financial resilience remain within the operating structure to maintain the infrastructure and meet long-term obligations.

The relevant question for this examination is therefore not whether shareholder returns are legitimate. It is whether the proposed financial structure provides adequate transparency and safeguards against the Scheme becoming financially distressed in a manner that could ultimately transfer maintenance, environmental or decommissioning liabilities to other parties, including landowners, local authorities or the public.

Against that background, the historical experience is relevant to the adequacy of safeguards. It provides a reasonable basis for asking whether debt, dividends and related-party payments could take priority over maintenance, environmental mitigation and decommissioning, and whether the DCO contains protections that remain effective if ownership or financing arrangements change.

I also consider it reasonable to establish whether interest, financing charges, management fees, royalties, dividends or other related-party payments could result in a material proportion of the economic value generated by the Scheme being transferred outside the United Kingdom, and what UK tax contribution is expected to arise from the project company over its operational life. I do not allege unlawful avoidance or assert that East Pye Solar will reproduce the financing history of Thames Water. I ask for transparency because the Applicant relies upon national economic, consumer and energy-security benefits in the planning balance.

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

- the ultimate corporate and beneficial ownership structure of East Pye Solar Limited, including the jurisdiction of relevant parent and holding entities;
- the intended financing structure for construction and operation, including the expected proportions of debt and equity;
- details of any material intra-group loans, shareholder loans or other related-party financing arrangements expected to be used in connection with the Scheme;
- the extent to which interest, financing charges, management fees, royalties or other material payments are expected to be made to related entities outside the United Kingdom, and the jurisdictions in which those entities are located;
- the basis on which the Applicant expects profits arising from the Scheme to be subject to UK corporation tax, including any material assumptions concerning the location of taxable profits;
- whether shareholder distributions are expected during the operational life of the Scheme and, if so, what restrictions or safeguards will apply to distributions where the Scheme has outstanding maintenance, environmental or decommissioning liabilities;
- what financial protections will remain available to meet the Scheme's obligations if the project company becomes insolvent or is transferred to another owner;
- whether ownership of the project is expected to remain with Island Green Power/Macquarie for the operational life of the Scheme or whether disposal to another investor or infrastructure owner is contemplated; and

- what arrangements will ensure that DCO obligations, environmental liabilities and decommissioning responsibilities remain fully enforceable following any change in ownership.

#### **4. Quantification of Claimed Economic, Consumer and Energy-Security Benefits**

The Applicant's Statement of Reasons [APP-020] states that the Scheme will help "lower bills for consumers throughout its operational life". I have not identified within the application documents reviewed a quantified estimate of the reduction in consumer bills attributable specifically to the Scheme, or a methodology by which that benefit has been calculated.

I therefore ask the Examining Authority to establish the evidential basis for this claimed benefit before attaching weight to it in the planning balance.

A similar issue arises in relation to any wider claim that additional renewable generation will reduce the United Kingdom's reliance on imported energy.

I recognise that additional domestic renewable electricity generation can contribute to the UK's transition towards a lower-carbon electricity system and can reduce the need for some fossil-fuel generation. The issue is not whether renewable generation can have such an effect in principle. The issue is whether the Applicant has demonstrated the scale and nature of the effect attributable specifically to East Pye Solar.

The Department for Energy Security and Net Zero's Digest of UK Energy Statistics 2026 reports that UK net import dependency was 43.3 per cent in 2025, compared with 43.7 per cent in 2024. It also reports that renewable technologies supplied a record 52.1 per cent of UK electricity generation in 2025, while the wider UK energy system remained heavily dependent upon fossil fuels and imports.

These figures do not demonstrate that renewable electricity cannot improve energy security. They demonstrate instead that the phrase "reducing reliance on imported energy" encompasses a much wider energy system than electricity generation alone. A 500MW solar development generates electricity; it does not directly displace imported oil used in transport or imported gas used for heating and other purposes. Nor does the existence of additional renewable generation, by itself, establish the extent to which UK net energy import dependency will fall.

I therefore ask the Applicant to identify the specific mechanism by which East Pye Solar is expected to reduce UK reliance on imported energy and, where that benefit is relied upon in the planning balance, to quantify the contribution attributable to the Scheme.

The Applicant should distinguish between:

- additional renewable electricity generation;
- displacement of UK fossil-fuel generation;
- displacement of electricity imports;
- any claimed reduction in wider UK energy import dependency;
- any claimed effect on consumer electricity bills.

Without such information, I do not suggest that the Scheme has no energy-security benefit. Rather, I ask that the claimed benefit be stated with sufficient precision to distinguish the general benefits of renewable deployment from benefits demonstrably attributable to this particular project.

This is particularly relevant because the Applicant's Statement of Reasons presents lower consumer bills as a benefit of the Scheme. If that benefit is relied upon in the overall planning balance, I ask the Applicant to provide the methodology, assumptions and quantified contribution attributable to East Pye Solar rather than relying upon the general proposition that additional renewable generation is beneficial.

I also ask the Applicant to provide current, confirmed figures for direct and indirect employment created by the Scheme, distinguishing construction-phase from permanent operational employment, and identifying the proportion expected to be filled by residents of South Norfolk.

#### **5. Operational Noise from Inverters, Transformers and Battery Storage**

While photovoltaic panels themselves are effectively silent, the inverters, transformers and Battery Energy Storage System (BESS) equipment required to operate a scheme of this scale are not. Such equipment can produce continuous noise, including low-frequency and tonal components, and BESS installations may require cooling and power-conversion equipment to operate outside daylight hours.

Operational noise from battery storage and electrical infrastructure is not merely a theoretical concern. In its consultation response to planning application UTT/22/2046/PINS at Land at Berden Hall Farm, Dewes Green Road, Berden, Uttlesford District Council's Environmental Health Officer recorded that East Hertfordshire District Council had investigated noise complaints

relating to an existing transformer and battery storage facility and that monitoring had identified distinct 100 Hz and 200 Hz tonal components. The same response noted that further complaints had been received from local residents alleging low-frequency humming associated with battery storage infrastructure. I do not rely on those complaints as evidence that East Pye Solar will necessarily generate similar effects. I refer to them because they demonstrate that concerns regarding low-frequency and tonal noise from battery storage systems are capable of substantiation and therefore justify careful scrutiny of the assumptions, operating conditions and mitigation measures adopted in the Applicant's noise assessment. [Uttlesford District Council Environmental Health consultation response, UTT/22/2046/PINS, 3 February 2023].

I therefore ask the Applicant to confirm the assumptions used in its noise assessment concerning BESS operation, inverter and transformer loading, cooling systems and night-time operation.

I also ask an additional question concerning design flexibility: where exactly will the BESS, inverters and transformers ultimately be located, and are those locations sufficiently fixed by the DCO and the assessed noise envelope to allow effects on the nearest residential receptors to be properly understood?

If the detailed equipment configuration or location can change after consent, I ask the Applicant to demonstrate that the maximum reasonably foreseeable noise scenario has been assessed at the nearest residential receptors and that subsequent design changes cannot produce materially greater effects than those examined.

I ask the Examining Authority to require the Applicant to:

- confirm what, if any, night-time operation of the BESS, inverters, transformers and associated cooling equipment is planned;
- identify the assumptions concerning operating conditions and equipment loading used in the noise assessment;
- identify the maximum reasonably foreseeable operational noise scenario and the residential receptors against which it has been assessed;
- secure specific noise mitigation, including acoustic enclosures where appropriate and minimum setback distances from residential receptors, within the DCO rather than leaving material safeguards entirely to post-consent detailed design;
- ensure that subsequent equipment selection or relocation cannot result in materially greater noise effects than those assessed at examination; and
- require post-construction acoustic validation testing under representative operating and weather conditions, including one-third-octave or equivalent frequency analysis sufficient to identify low-frequency and tonal characteristics at representative residential receptors, with the results published; and
- require independent, ongoing noise monitoring once the Scheme becomes operational, with a clear and publicised mechanism for residents to report and have investigated noise that appears to exceed agreed limits.

## **6. Deferral of Material Detail to the Post-Consent Stage**

Across the application, a significant volume of detail relevant to environmental, amenity and economic impacts is left to be resolved through management plans and schemes approved by South Norfolk Council after the DCO is made, rather than being fixed at the point of consent. This is a recognised feature of Nationally Significant Infrastructure Project consenting, generally described as the “Rochdale Envelope” approach, under which a worst-case envelope is assessed at examination and detail is fixed later, provided it remains within the assessed parameters.

I do not object to this approach in principle. My concern is that it should not be used to defer matters that are readily capable of being specified now, particularly where those matters are material to residential amenity or environmental effects.

This concern is particularly relevant to the lighting and noise matters raised in my earlier Written Representation. Where the Applicant relies upon mitigation as part of its assessment of likely effects, that mitigation should, wherever reasonably practicable, be secured with sufficient precision at the point of consent to demonstrate that the effects assessed during examination can be controlled in practice.

### **6.1 Relationship Between the Rochdale Envelope and Environmental Assessment**

I ask the Examining Authority to establish clearly which parameters are fixed by the DCO and which remain capable of change after consent, and whether the maximum reasonably foreseeable configuration has been assessed.

In particular, I ask the Applicant to identify:

- which aspects of the final layout, equipment specification and equipment location remain flexible after consent;
- whether changes in the location of BESS, inverters or transformers could bring noisy equipment closer to residential receptors;
- whether changes in lighting design or equipment configuration could materially alter night-time lighting effects or sky glow;
- what objective limits prevent detailed design from producing materially greater environmental effects than those assessed during examination; and

- what evidence must be supplied to the local planning authority before a post-consent change can be approved.

I also ask the Examining Authority to identify which currently outline or illustrative matters could reasonably be fixed within the DCO itself, rather than left to post-consent approval, particularly in relation to lighting, noise and construction traffic.

Where detail is deferred, I ask that the relevant Requirement specify a clear, objective test against which the local planning authority must assess compliance, rather than relying solely upon a general requirement that development remain “substantially in accordance with” the assessed parameters.

I also ask that a named consultee role for the relevant parish council(s) be built into the discharge process for management plans with direct effects on residential amenity.

Finally, I ask the Examining Authority to confirm the mechanism by which paragraph 2(4) of Schedule 15 to the draft DCO, concerning whether a proposed discharge would cause materially new or different environmental effects, will be tested and by whom, and whether that determination is capable of independent challenge.

## **7. Long-Term Decommissioning and Financial Security**

The proposed Scheme is intended to operate over several decades. Its long-term public-interest implications therefore extend beyond construction and operation to eventual decommissioning and restoration.

I ask the Applicant to identify clearly who will be legally and financially responsible for decommissioning the Scheme, and what financial security will be available if the project company is insolvent, ownership has changed, or the value of the project has materially changed by the end of its operational life.

The financial security should cover, as appropriate, the removal and disposal of solar panels, mounting structures, inverters, transformers, BESS equipment, cabling and associated infrastructure, together with restoration obligations. I ask the Applicant to explain how the security has been calculated, whether it will be indexed, whether it will be independently reviewed during the operational life, and whether it can be accessed without lengthy litigation.

I consider this directly relevant to the corporate and financing questions above. Demonstrating that a project can be financed to construction is not the same as demonstrating that its environmental and decommissioning liabilities remain financially secured for the full life of the infrastructure.

## **8. Summary of Requests to the Examining Authority**

- Require the Applicant to confirm whether brownfield, industrial, previously developed and distributed solar options beyond the self-imposed 20 km search radius were assessed, and if not, why not.
- Require the Applicant to identify whether the 20 km radius was compared with any wider search area and to provide the environmental, technical and commercial basis on which land beyond that radius was excluded.
- Require the Applicant to explain the different treatment of landowner willingness in its alternatives assessment and its use of compulsory acquisition powers for the chosen site.
- Require the Applicant to confirm whether distributed or reduced-capacity alternatives involving rooftops, car parks and other previously developed land were assessed.
- Require the Applicant to provide transparent information concerning ultimate ownership, financing, related-party payments, taxation and the treatment of profits generated by the Scheme.
- Require the Applicant to explain whether ownership may change during the operational life and how DCO, environmental and decommissioning obligations would remain secured following any change of ownership.
- Require the Applicant to provide a quantified and evidenced basis for its claim that the Scheme will lower consumer bills.
- Require the Applicant to identify and quantify the specific contribution of East Pye Solar to any claimed reduction in UK reliance on imported energy, distinguishing electricity-generation benefits from wider UK energy import dependency.
- Require confirmation of planned night-time BESS, inverter, transformer and cooling operation and of the maximum reasonably foreseeable operational noise scenario.
- Secure appropriate noise mitigation, equipment-location constraints and minimum residential setbacks within the DCO rather than leaving material safeguards entirely to post-consent detailed design.
- Require independent post-construction noise monitoring with a clear resident reporting and investigation mechanism.
- Require post-construction acoustic validation testing, including assessment of low-frequency and tonal noise characteristics at representative residential receptors, and publication of the results.
- Ensure that matters capable of being fixed at consent are not unnecessarily deferred to post-consent management plans and that deferred matters are governed by objective compliance tests.
- Require appropriate parish consultation in the discharge of requirements directly affecting residential amenity.
- Require clear and adequate long-term financial security for decommissioning and restoration, including protection against insolvency or changes in ownership.

## 9. Conclusion

I support the national objective of increasing renewable energy generation. My concern is that the public benefits relied upon by the Applicant should be evidenced at the level of the particular Scheme, rather than inferred solely from the general benefits of renewable energy.

Similarly, I do not suggest that the Applicant's corporate ownership or historical association with Thames Water establishes how East Pye Solar will be financed or operated. I ask instead that the scale and duration of the proposed infrastructure justify a transparent examination of its ownership, financing, taxation, shareholder distributions, long-term financial resilience and decommissioning security.

The latest DUKES statistics demonstrate that UK energy import dependency remains a broad system-wide issue, notwithstanding continued growth in low-carbon generation. In that context, I ask that any claimed energy-security benefit attributable to East Pye Solar be quantified rather than expressed only as a general proposition.

I also ask that operational noise, lighting and other environmental effects are assessed against the maximum reasonably foreseeable configuration and that mitigation relied upon in the examination is secured with sufficient precision to remain effective after consent.

I respectfully ask the Examining Authority to require the Applicant to respond to these matters and, where necessary, provide further evidence before the examination concludes.

Yours faithfully,

Victoria Kirk

The Long House, Hempnall.

## Sources Cited / Referred To

- East Pye Solar Environmental Statement, Volume 1, Chapter 5: Reasonable Alternatives and Design Evolution [APP-041].
- East Pye Solar Statement of Reasons [APP-020].
- East Pye Solar Funding Statement [APP-021].
- East Pye Solar, Grid Connection Statement [APP-069].
- Department for Energy Security and Net Zero, Digest of UK Energy Statistics 2026, Chapters 1 and 6.
- Department for Energy Security and Net Zero, Regional Renewable Statistics / Regional renewable electricity, latest available tables for English regions and local authorities.
- Macquarie Asset Management, Macquarie and Thames Water - published factsheet setting out Macquarie's account of its investment period.
- House of Commons Environment, Food and Rural Affairs Committee, evidence and reporting concerning the financial resilience and ownership history of Thames Water.
- Aviva / RenEnergy, Broadland Business Park solar carport case study.
- Uttlesford District Council, Environmental Health Consultee Comments: Planning Application UTT/22/2046/PINS, Land at Berden Hall Farm, Dewes Green Road, Berden, 3 February 2023.

**Note on evidence:** The Thames Water material is included as contextual background and is expressly not presented as evidence that East Pye Solar will be financed or operated in the same way. The DUKES figures are used to distinguish general energy-security claims from the specific, quantifiable contribution attributable to this Scheme.