

Objections submitted in response to East Pye Solar

PINS Reference: EN0110014

Site 1 - Great Moulton:

Assessing the Full Extent of the 1A–1D Development Footprint

Submitted on behalf of BEPS - Great Moulton



Image of Site 1B on the boundary of Great Moulton

DISCLAIMERS

Research Method and Use of AI

This document has been prepared from research undertaken by multiple human researchers using information available at the date of preparation. Sources include East Pye Solar application documents, Planning Inspectorate material, National Grid/NGET information, statutory consultee evidence, relevant government and regulatory material, guidance, best practice and, where relevant, peer-reviewed research.

Given the scale and complexity of the documentary record, BEPS Great Moulton also uses a closed-project bespoke GPT as a research and analytical aid. It assists with organising, cross-referencing and comparing material, identifying links between documents and topics, and supporting analysis of evidence already gathered by the research team.

The GPT is not treated as an independent source of evidence or as a substitute for human judgement. All submissions are reviewed, edited and checked by human members of BEPS Great Moulton. Material sources and significant factual propositions are checked against the underlying documents before reliance is placed upon them, and the authors determine the arguments and conclusions advanced.

This document is therefore a **human-reviewed submission, not an independent expert report**. Responsibility for its contents, accuracy and arguments remains with the authors. AI has been used only as an analytical, cross-referencing and document-management tool within a human-led research and review process.

Where this draft refers to National Grid Electricity Transmission plc (NGET) representations, it relies on the wording quoted in the source document unless the final submission team has separately checked the published Examination Library version.

The Ofgem material is used for a narrow purpose: it supports the proposition that BESS connection deliverability, queue credibility, battery oversupply and network -capacity allocation are live regulatory matters. It is not used to assert that East Pye has lost its connection or that the BESS cannot connect.

It is understood that East Pye Solar has continued to amend, supplement and update material submitted to the Planning Inspectorate during the examination process.

Accordingly, we respectfully ask the Examining Authority to read this submission in the context of the information reasonably available to us at the time it was prepared. Where subsequent Applicant submissions clarify, amend or supersede earlier information, any resulting discrepancy within this document is unintentional and should not be interpreted as an attempt to misrepresent the Applicant's case or evidence.

On behalf of the Village of Great Moulton we have sought throughout to present the Applicant's evidence accurately and fairly, while identifying those matters on which we consider further clarification, evidence or examination is required.

Initial Comments on Submission by the Writers of this Document

Great Moulton residents submit that the East Pye Solar application is unusually difficult for affected residents to understand because the principal effects on Great Moulton are split across multiple application documents, plans, appendices and outline management documents. The issue is not merely volume. It is the absence of one consolidated, parcel-specific explanation of the National Grid Substation, the 400 kV Project Substation, the BESS interface, overhead-line works, pylons, access, drainage, construction compounds, lighting, safety controls and retained infrastructure affecting Site 1.

This submission therefore asks the Examining Authority to test the Scheme as it will be experienced locally: as a concentrated western grid infrastructure hub on and around Site 1 and the BESS, not as a set of isolated technical components.

The Structure of East Pye's documents and lack of clarity, means that we are unable to obtain a full understanding of the design being proposed. From incorrectly labelled images and photographic co-ordinates making it impossible to actually ascertain what and where they have photographed - see document EN01110014, this document actually includes the National Grid Substation although labelled BESS.

The residents' position remains firm: renewable -energy policy does not remove the need to test whether the chosen BESS location is justified and whether its acknowledged impacts are acceptably controlled.

Oxford EN010147 Secretary of State Request

The Secretary of State request for further information in Botley West Solar Farm, EN010147, is not relied upon as a binding precedent. It is relied upon only as a recent comparator showing that, in a large solar NSIP, unresolved issues about alternatives, site selection, grid connection, design evolution, cumulative effects and mitigation can justify further information before determination.

The same type of scrutiny is appropriate here because Land Parcel 1 / Site 1 combines the National Grid Substation, 400 kV Project Substation, overhead -line works, cable routes, pylon works, access requirements, PRow interactions, Grade 2 BMV land, private-water -supply risk, landscape harm and the functional relationship with the BESS.

CONTENTS

CONTENTS	4
EXECUTIVE SUMMARY	7
1. Need, Regional Oversupply and Proportionality	7
2. DCO Certainty, Documentation and Post-Consent Controls	8
3. Consultation Adequacy	8
4. Land Parcel 1 as the Cumulative Infrastructure Choke-Point	9
5. Site Selection - Unlawful or Inadequate Alternatives	9
6. Permanent Loss of Grade 2 BMV Agricultural Land	11
7. Groundwater, Private Water Supplies and Pollution Control	11
8. Compulsory Acquisition and Funding Evidence	12
9. Ecology and Barbastelle Deliverability	12
10. Safety, Access, Rail and Aviation	12
10.1 Failure to Provide a Site-specific Norfolk Fire and Rescue (NFRS)	13
10.2 Abnormal Loads, Station Road and Rail Interface	13
10.3 Aviation and Glint / Glare	13
11. Overall Position	14
Examination Requests	15
Chapter 1 Introduction	21
1.1 Summary of the Historic Landscape of Great Moulton (Moulton St Michael)	21
1.2 Great Moulton: Landscape, Heritage and Community	22
Chapter 2 Environmental Impact Assessment Methodology & Scheme Flaws	24
Introduction	24
2.1 Missing Private Water Supply Surveys and Consultation	25
2.2 Missing Ecological Surveys, Mapping or Consultation	25
2.3 Telecoms & Emergency Access	26
2.4 Climate Change	26
2.5 Missing Analysis of Views from Listed Buildings or Impacted Homes	26
2.5.1 Oak Lodge, High Green, Great Moulton	28
2.5.2 Laburnham Farm House, High Green, Great Moulton	28
2.5.3 Potters Crescent	29
Chapter 3 The Order Limits - Site and Surroundings	30
3.1 Site Selection, Retention and Reasonable Alternatives	30
3.2 Site Selection, Location and Context	32
3.3 National Grid Connection Point	34
3.3.1 Connection status and consequences for Site 1B	34
3.4. Targeted Consultation - October 2025	35
3.5 Key objection points arising from the Order Limits material	36

3.6 Nearby Residential Dwellings – Sites 1A to 1D and the BESS	36
3.7 Grade 2 BMV Land	36
3.8. Plateau Farmland Sensitivity to Industrialisation	36
Chapter 4: The Scheme	38
4.1 Permanent versus Temporary Effects – Site 1 and the BESS	38
4.1.1 Whole-life replacement activity	39
4.2 Site 1B - National Grid Substation And 400kv Project Substation.....	39
4.2.1 Rochdale Envelope - scenario testing	40
4.3 Area and location.....	40
4.4 Grid connection / pylon works	44
4.5 Proposed Solar Panels	46
4.6 Site 1C & 1 D.....	46
4.7 Noise Intrusion into rural Rural Character, Cumulative Effects and Assessment Uncertainty	47
4.7.1 Noise Impact Assessment Review	51
APPENDIX 2 Based on the Review undertaken by Oakridge Environmental Services	51
4.7.2 Noise Impact Assessment Review	51
4.8 Information Required from East Pye Regarding Deferred Design, Noise and Access Details	51
Chapter 5: Reasonable Alternatives and Design Evolution.....	53
5.1 National Policy on Site Selection and the Point of Connection.....	53
5.2 National Grid Substation Alternatives - Options 1,2,3,4A & 4B	54
5.3 Design Evolution - Site 1 B.....	61
5.4 Parcel-specific justification for Sub-Sites 1A–1D.....	61
5.5 The BESS - Site Selection & Risk Specific Alternatives	62
5.6 Design Evolution – Mitigation After Selection versus Avoidance Through Selection	63
5.7 Later BMV Evidence and Reconsideration of Site Selection	64
5.8 Private Water Supplies	64
5.9 Cumulative Site 1/BESS Infrastructure Cluster	65
5.10 National Grid Infrastructure and Delivery Uncertainty	65
5.11 Conclusion.....	66
Chapter 6 Site Selection Compliance/Audit Trail, Horlock Compliance and Grid Hub Design	68
6.1 Audit Trail – Options 1 to 4A and 4B	68
6.2 Land Availability and Willing Landowners	69
6.3 Horlock Rules and Site 1B	70
6.4 AIS, GIS and Lower-Impact Substation Design	71
6.5 Consistency in the Treatment of Constraints	72
6.6 Information Requested from the Applicant and NGET	73
6.7 Conclusion.....	74
Chapter 7 Climate Change	74

Chapter 8 Landscape and Visual	75
8.1 Applicant's own LVIA findings	75
8.2 Misrepresentation of images	75
8.2.1 Clarification of where this image was taken?	75
8.2.2 Site 1B - Distortion of site looking towards Village Boundary	77
8.2.3 Site 1B - Distortion of site looking towards Broadgate Lane from Frith Way	78
Chapter 9 Ecology and Biodiversity.....	79
Chapter 10 Water Environment	79
10.1 Independent hydrogeological review	80
Chapter 11 Cultural Heritage	80
Chapter 12 Transport and Access , Public Rights of Way and Glint/Glare	80
Chapter 13 Noise and Vibration	81
13.1.1 Great Moulton - Private Consultants - Noise Analysis.....	81
Chapter 14 Air Quality.....	81
Chapter 15 Socio-Economics.....	82
Chapter 16 Soils and Agriculture	82
Chapter 17 Ground Conditions	83
Chapter 18 Electromagnetic Fields	83
Chapter 19 Other Environmental Matters	84
Chapter 20 National Grid Infrastructure Cluster	84
Chapter 21 Cumulative and In-Combination Effects	84
Chapter 22 Human Health and Wellbeing	85
Chapter 23 Great Moulton Specific Issues	85
Chapter 24 Core position.	86
Concluding Request	87
Appendix 1	89
Correspondence between the Village and National Grid Regarding the POC.	89
Appendix 2	98
Noise Impact Assessment Review - by Oakridge Environmental Services	98
Appendix 3.....	113

EXECUTIVE SUMMARY

Great Moulton residents object to the concentration of the Scheme's principal western grid infrastructure at and around Land Parcel 1, particularly Sub-Site 1B. The submitted East Pye material confirms that the Scheme includes a new National Grid Substation and a 400 kV Project Substation, Grid Connection Infrastructure, including overhead-line and pylon works, cable routes and BESS infrastructure and associated access, drainage, security and mitigation works. These elements are functionally linked and should be assessed together.

The core objection is not that every topic is wholly unassessed, our objection is, that the acceptability of this locations depends on a transparent, criteria-led and enforceable justification for concentrating long-lived and permanent grid infrastructure close to Great Moulton village, that justification has not yet been provided with sufficient clarity.

The National Grid Substation and Grid Connection Infrastructure are materially different from temporary solar arrays. The East Pye material indicates that solar generation equipment and some project infrastructure would be removed at decommissioning, while the National Grid Substation and Grid Connection Infrastructure would remain in situ.

The planning balance must therefore distinguish temporary generation from retained transmission infrastructure, the effects cannot therefore be treated simply as temporary or reversible.

1. Need, Regional Oversupply and Proportionality

Great Moulton residents do not, in the main, dispute the national policy support for low-carbon generation. However, the issue is whether this particular 500 MW scheme, and especially the Site 1 grid hub and BESS interface, has been justified as necessary, proportionate and least harmful at this location.

The Applicant's own Statement of Need is said to acknowledge that the Site lies at the boundary of the Central England and East Anglia transmission 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. If those ranges are already met by prioritised schemes, regional necessity and proportionality cannot simply be assumed from national policy support for solar in principle.

The 2026 connections reform and Ofgem material materially strengthen the need for examination of deliverability and proportionality. Ofgem has stated that the battery queue is far beyond projected system need, with approximately 90 GW either operational or in the reformed queue compared with a projected 29 GW requirement by 2035. Ofgem is consulting on an Oversubscribed Technologies Commitment Fee intended to make the BESS queue more

credible and to ensure scarce grid capacity is held by projects that are serious about progressing.

This does not prove that East Pye cannot connect. It does mean that BESS connection status, connection offer assumptions, network-capacity allocation, likely attrition and the relationship between the solar and BESS components are material matters for the ExA. The Applicant should not be permitted to rely on general national need while avoiding detailed scrutiny of whether this BESS and grid hub are needed and deliverable in this location

Where permanent transmission infrastructure is proposed on high-quality agricultural land in a rural landscape close to Great Moulton, the quality of the site-selection and alternatives case is correspondingly important.

Source: APP/7.11 Statement of Need, including sections 5.3 and 7.2-7.3; APP/7.12 Grid Connection Statement.

2. DCO Certainty, Documentation and Post-Consent Controls

The submitted DCO and the outline plans must provide enough certainty for the ExA to reach a reasoned conclusion on likely significant effects. When critical matters are left to a later detailed design, the DCO must secure fixed parameters, approval triggers, standards, monitoring and corrective action, and monitoring obligations where they bear on likely significant effects or site suitability.

The section 51 advice identified the need for precision in document references, document dates, definitions and qualified commitments. This matters, because Site 1 impacts depend on construction access, drainage, firewater containment, noise control, protected species mitigation, utilities protection, PROW management and decommissioning controls.

Great Moulton residents ask that all commitments bearing on likely significant effectors be converted from board wording such as “where practicable” or “where appropriate”, into binding requirements with approval bodies, objective standards and enforcement routes.

There also appears to be material inconsistency in the description of the BESS location. ES Chapter 4 states that Work No. 2 is the BESS compound “contained within Sub-Site 1B”, while the Non-Technical Summary and other scheme descriptions refer to a separate BESS Site. The Applicant should reconcile those descriptions and confirm that the Environmental Statement assesses the correct worst-case relationship between the BESS, Sub-Site 1B, the National Grid Substation and the Project Substation infrastructure.

Source: PINS section 51 post-acceptance advice, EN0110014-000275; APP/6.1.4 ES Chapter 4, para 4.2.7; APP/6.4 ES Non-Technical Summary.

3. Consultation Adequacy

The consultation concern is practical and substantive. Residents were required to respond to a large technical application whose most important local effects were spread across many documents and changed through design evolution.

Where the grid solution, substation voltage, BESS relationship, pylon works, access requirements or retained infrastructure have materially changed since earlier consultation, the Applicant should provide an auditable before-and-after schedule. That schedule should identify what changed, which receptors were newly or differently affected, what additional assessment was undertaken and why the Applicant says no new significant effects arise.

The ExA should treat consultation adequacy together with the clarity of the environmental information. A community cannot meaningfully engage with a grid hub if it must infer its true scale and operational effects from fragmented plans and outline documents.

The ExA should treat this statutory consultation with caution because consultees were asked to respond to a very large and evolving Scheme, including the BESS, National Grid substation, project substations, cable corridors, 400 kV overhead-line and pylon works, compulsory acquisition powers and a 60-year operational life.

The consultation documents were available electronically without charge and inspection copies were provided at specified locations. However, the section 46/48 consultation material stated that a requested printed copy of the PEIR and PEIR Non-Technical Summary could attract a charge of up to £750.

We do refute that the information was wholly unavailable; its concern is the practical accessibility of a large technical consultation for residents who could not readily use the electronic material, combined with subsequent design evolution and corrections.

Source: APP/5.9 statutory consultation notices/materials; Applicant Adequacy of Consultation material; PINS correspondence and section 51 advice concerning parish-council notification.

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

Land Parcel 1 is not simply another solar field . It is the proposed point at which the National Grid Substation, the 400 kV Project Substation, Grid Connection Infrastructure and overhead-line/pylon, cabling, access, drainage, security, construction compounds, PRoW impacts and the BESS interface converge in a confined rural area.

We submit that this convergence produces a local cumulative effect. Residents, walkers, farmers, emergency services and PRoW users will experience the combined infrastructure, not separated topic chapters.

The ExA should therefore require a place-based Great Moulton / Site 1 cumulative assessment.

5. Site Selection - Unlawful or Inadequate Alternatives

Great Moulton's concern is not that the Applicant has produced no alternative material, the issue is whether the selected location has been tested transparently and consistently against environmental land-use, community and safety criteria.

When Norwich Main was discounted, the Applicant pursued a new 400kV connection along the Bramford to Norwich line. We accept that an alternative exercise was undertaken. The evidence does not yet demonstrate that Great Moulton was selected as the least harmful location.

We ask the Examining Authority to look carefully at the chronology, particularly the role of landowner willingness.

APP/7.20 paragraph 6.1.3 states that suitable land "with willing landowners wishing to participate in the Scheme" was identified at the same time as undertaking discussions with NGET about the grid connection.

Paragraph 6.1.7 confirms further that during Stages 2 and 3, land agents identified large landholdings with potentially willing landowners, which were then evaluated and taken forward to EIA Scoping.

This shows that landowner willingness was already influencing the process before the January 2025 EIA Scoping exercise.

APP/7.20 records the original National Grid Substation alternatives at Newton Flotman, Tharston/Tasburgh and Long Stratton — Options 1, 2 and 3 — before Great Moulton was introduced as the additional Option 4.

However, APP/7.20 does not clearly explain for Options 1, 2 and 3:

- whether the relevant landowners were approached
- when they were approached
- whether they were willing to participate
- whether those sites were available on the same voluntary basis as the Great Moulton land.

By January 2025, the EIA Scoping material showed both the southern Great Moulton location and the alternative location within what became Sub-Site 1B. APP/7.20 paragraphs **3.5.20–3.5.22** confirm that the southern location was initially the proposed site, with Site 1B as the alternative.

Paragraph 4.6.1 later confirms that the Applicant had established that landowners for the identified sites were willing to enter into voluntary agreements.

APP/7.20 paragraph **3.6.24** expressly records that alternative land within Siting Zone 2, south of Station Road and west of the railway, **was not selected because a willing landowner was not**

forthcoming. We would submit that this demonstrates landowner willingness was capable of determining whether potentially suitable land remained within the alternatives exercise.

We therefore ask the Examining Authority to require a clear chronology for Options 1, 2, 3, 4A and 4B, identifying:

- the date each option was first considered
- When landowners were first approached
- whether that landowner was willing to participate
- whether land availability was established **before or after** the environmental and technical assessment of that option.

Without that information, it is difficult to establish whether landowner willingness was simply a final deliverability check, or whether it **materially narrowed the alternatives before they could be compared on an equal basis.**

Source: APP/7.20 Site Selection Assessment, including the Norwich Main and Great Moulton option appraisal; Applicant references to the Horlock Rules.

6. Permanent Loss of Grade 2 BMV Agricultural Land

The agricultural-land case should be stated precisely. Site 1 and the National Grid infrastructure affect good quality BMV Grade 2 land, this infrastructure and project substation infrastructure are not comparable to raised solar arrays, because they involved hardstanding, foundations, access, drainage, operational compounds and retained infrastructure.

The Applicant should explain, when the early selection exercise relied on provisional Grade 3 land and later detailed ALC evidence identified Grade 2 land, why did this evidence not trigger reconsideration of the grid hub and BESS location, If it didn't the reason should be stated.

The ExA should require a field-by-field BMV schedule distinguishing temporary, long-term and permanent land take, including Site 1A-1D, the BESS Site, access, cabling, compounds, substations and mitigation land.

Source: APP/6.1.15 ES Chapter 15; APP/6.4 ES Non-Technical Summary; Outline Soil Resource Management Plan / detailed ALC evidence.

7. Groundwater, Private Water Supplies and Pollution Control

The water objection is not that East Pye has ignored water entirely. The remaining concern is the extent to which critical site-specific controls are deferred. The Outline CEMP provides for ground investigation before construction and states that a Foundation Works Risk Assessment will be undertaken post-consent for structures requiring deep foundations and/or piling, such as the Project Substations. A Hydrogeological Risk Assessment may also be required for trenchless crossings that interact with aquifers, watercourses or sensitive ecological receptors. For a permanent high-voltage installation involving transformers, oils, fuels, concrete works, impermeable areas and emergency/firewater considerations,

The ExA should require a single source-pathway-receptor note for Great Moulton / Site 1 and the BESS, covering baseline water-quality testing, private water supply identification, hydrogeological pathways, trenchless works, piling, oil containment, firewater containment, drainage exceedance, monitoring, response triggers and alternative supply arrangements.

Pollution-control measures should be secured through DCO Requirements and certified plans, not left as non-specific post-consent construction management.

Source: APP/6.1.9 ES water-environment assessment and appendices; APP/7.1 Outline CEMP, including ground investigation and Foundation Works Risk Assessment commitments; relevant consultation responses from the Environment Agency.

8. Compulsory Acquisition and Funding Evidence

Compulsory acquisition must be considered with alternatives and necessity. If the site-selection case is not robust, the case for acquiring or interfering with land and rights at Site 1 is correspondingly weakened.

The ExA should require the Applicant to show that each parcel and right within Site 1A-1D, Station Road, Frith Way, Hundred Lane and associated PRow / utility land is necessary, proportionate and no more extensive than required for the authorised development.

Source: PINS section 51 post-acceptance advice, EN0110014-000275; Applicant Funding Statement and compulsory-acquisition documents.

9. Ecology and Barbastelle Deliverability

The Applicant's bat evidence records that the Order Limits fall within the Core Sustenance Zone of several known Barbastelle maternity colonies in surrounding woodland. The Ground Level Tree Assessment also identifies numerous trees with potential roosting features and states that, if bats are confirmed roosting in a tree that would be affected, an appropriate European Protected Species mitigation licence would be required before those works.

The Applicant seeks to avoid effects through retention of trees and hedgerows, buffers and lighting controls. BEPS's point is therefore one of deliverability: the final design of the 1B grid infrastructure and its associated lighting, access and construction disturbance should demonstrably maintain the ecological connectivity on which the assessment relies. If a licensable effect cannot be avoided, the statutory licensing tests, including the absence of a satisfactory alternative, become relevant.

PINS also noted at acceptance that the HRA material did not include the relevant Natura 2000/citation data sheets and recommended that these be supplied. That is an audit-trail issue that the competent authority should resolve; it is not, by itself, proof that the HRA conclusions are wrong.

If the final design requires a European Protected Species licence, the ExA should examine whether the no-satisfactory-alternative test can realistically be satisfied where the alternatives case for Site 1B remains contested.

Source: APP/6.1.8 ES Ecology and Biodiversity; APP/6.3.8.5 Ground Level Tree Assessment; PINS acceptance checklist / HRA observations.

10. Safety, Access, Rail and Aviation

Site 1 is a safety-critical infrastructure hub. Fire safety, transformer delivery, abnormal loads, emergency access, rail interface, aviation and glint / glare are not secondary construction details. They bear directly on site suitability.

The Applicant should provide one safety and emergency-response schedule for Site 1 and the BESS, including access widths, turning, cordons, smoke plume, water supply for firefighting, contaminated runoff, transformer incidents, battery incidents, road closures, railway interface, aviation safeguarding and emergency-service consultation outcomes.

10.1 Failure to Provide a Site-specific Norfolk Fire and Rescue (NFRS)

The NFRS have expressed their concerns regarding the proposed changes to the siting to the National Grid 400kV substation and the location change of the 132 kV substation upgraded to 400kV. They have particularly raised serious concerns given the close proximity to nearby residents in Great Moulton in the event of any fire or other emergency

The emergency-response assessment should be Site 1-specific and should include the National Grid Substation, 400 kV Project Substation, transformers, switchgear, oil containment, control buildings, cabling, access and firefighting water. It should not be limited to the BESS.

It should record NFRS consultation and secure any required controls.

BEPS-Great Moulton requested the ExA to require a site-specific Norfolk Fire and Rescue Service consultation schedule, showing what NFRS has requested, what the Applicant has accepted, what remains outstanding and how controls will be secured.

Source: APP/7.5 Outline Battery Safety Management Plan and related fire-emissions material; submitted drainage and emergency-management documents.

10.2 Abnormal Loads, Station Road and Rail Interface

Transformer delivery to the National Grid Substation and 400 kV Project Substation requires abnormal-load planning. Station Road, Frith Way, Lodge Road, Hundred Lane and the local railway interface should be assessed together for resilience, traffic management and emergency access.

The ExA should not accept that abnormal loads can be resolved solely through a later Construction Traffic Management Plan unless the critical route assumptions, structures, swept paths, verge protection, road closures and emergency arrangements are already fixed in principle.

Source: APP/6.3.11.1 Transport Assessment, including abnormal-load routing to Sub-Site 1B and the description of B1134 Station Road.

10.3 Aviation and Glint / Glare

Aviation and glint/glare effects are relevant to road safety, residential amenity and local aviation activity. The source material identifies Seething, Long Stratton, Hardwick, Topcroft Farm and Nut Tree Farm airfields, Norfolk Gliding Airfield, and consultation concerns relating to glint and glare, EFATO and thermal updrafts. For Land Parcel 1, these issues must be considered alongside solar panels, new overhead-line works, pylons, substations and associated construction activity.

The ExA should require confirmation that the final western infrastructure is within the aviation and safeguarding assumptions assessed, and that any consultant conditions are secured before operation.

Source: APP/6.1.18 ES Other Environmental Topics; submitted Glint and Glare and aviation / high-level investigative reports, including APP/7.27.

11. Overall Position

It is submitted that Land Parcel 1 / Sub-Site 1B has not been transparently justified as the location for the principal grid hub of the East Pye Solar scheme. Our case is that Land Parcel 1 / Sub-Site 1B remains the critical point at which the Scheme's alternatives, cumulative effects, permanent infrastructure, protected-species, groundwater, agricultural-land, access, safety and compulsory-acquisition issues come together. The Applicant has produced substantial assessment material, but the Examining Authority must be satisfied that the final configuration is justified by a transparent alternatives case and controlled by enforceable requirements that keep it within the assessed environmental envelope.

The cumulative impact of the scheme will crystallise in this area: 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.

The ExA should require a consolidated Site 1 Grid Hub Statement, a revised alternatives appraisal, a National Grid / NESO / NGET delivery statement, a place-based cumulative effects assessment and a schedule of enforceable DCO controls before placing significant weight on the Applicant conclusions.

Examination Requests

On behalf of Great Moulton, Tivetshall and Wacton, we respectfully request that the Examining Authority require East Pye, and NGET where relevant, to provide a coordinated response to the matters set out below.

These requests are intended to test whether the Scheme is sufficiently defined, assessed and secured for determination. They do not seek to transfer the Applicant's design, assessment or evidential responsibilities to local residents.

- Provide a definitive Site 1 Grid Infrastructure Reconciliation Plan and Schedule covering Sub-Sites 1A–1D, the National Grid Substation, 400 kV Project Substation, Grid Connection Infrastructure, overhead-line and pylon works, underground cables, construction compounds, access routes, drainage, security infrastructure, mitigation land and the interface with the BESS. For each component, identify the relevant Work Number, maximum parameters, land requirement, temporary or permanent status, delivery body, operational responsibility and decommissioning position. [APP/6.1.4; APP/2.3; APP/7.12; APP/7.18]
- Confirm the final or presently assumed grid-connection solution and its deliverability, including the respective responsibilities of East Pye and NGET for design, construction, land, consent, operation and maintenance of the National Grid Substation, overhead-line works and associated Grid Connection Infrastructure. Identify which elements are fixed and which remain subject to NGET detailed design or further agreement, and demonstrate that any remaining flexibility cannot produce materially different environmental effects. [APP/7.12]
- Reconcile the current connection position for the solar and BESS components and explain the consequences for Site 1 if their connection rights, timing or configuration differ. This should include confirmation that the Site 1 land take, substation configuration, cable infrastructure and environmental assessment remain justified under each realistically deliverable connection scenario. [APP/7.11; APP/7.12]
- Provide a dated and auditable National Grid Substation alternatives chronology for Options 1, 2, 3, 4A and 4B, identifying when each option was identified, assessed, refined and discounted or selected; the evidence available at each decision point; and the technical, environmental, access, residential, land-use and planning criteria applied.
- Provide a common side-by-side comparison of Options 1, 2, 3, 4A and 4B, using consistent criteria and identifying the contemporary evidence supporting each assessment. Where different levels of technical investigation were undertaken—for example highway, abnormal-load, landscape, flood-risk, ecology, heritage or PRow work—the Applicant should explain why the comparison remained robust. [APP/7.20]

- Explain transparently how land availability and landowner willingness influenced site selection. The Applicant should identify when those considerations entered the process, distinguish locations rejected on environmental or technical grounds from locations not progressed because land was unavailable, and demonstrate that reasonable alternatives were not excluded from meaningful comparison solely because voluntary land agreements were not available. [APP/7.20; APP/7.15]
- Provide a Horlock Compliance Schedule for the Site 1B Grid Hub, prepared with NGET input where appropriate, showing how the relevant principles influenced site selection and design, including local amenity, landscape and screening, residential proximity, noise, agricultural land, groundwater, ecology, PRoW, access and the concentration of infrastructure at Site 1B. [APP/7.20; APP/7.14]
- Provide a design-options statement for the National Grid Substation and 400 kV Project Substation, explaining the consideration given to AIS, GIS, hybrid or other compact arrangements and alternative layouts. Where an alternative was studied and rejected, provide the reasons; where it was not studied, explain why it was not considered a reasonable design alternative. Demonstrate that the retained design envelope represents the assessed worst case for footprint, height, visual effects, noise, drainage and land take.
- Identify every environmentally material matter remaining flexible under the Rochdale Envelope and provide a compliance schedule linking each matter to the relevant maximum parameter, ES worst case, certified document, DCO Requirement, approval body and verification mechanism. The Applicant should demonstrate that detailed design cannot exceed the environmental effects assessed. [APP/6.1.4; APP/7.18; APP/7.26]
- Provide a definitive statement on permanence and decommissioning. This should distinguish the infrastructure intended to be removed after the approximately 60-year operational period from the National Grid Substation and Grid Connection Infrastructure intended to remain, identify any secured end date for the retained infrastructure, and show the post-decommissioning Site 1 landscape including retained access, pylons, cables, drainage, fencing and mitigation planting. [APP/6.1.4; APP/7.3]
- Confirm the long-term management and legal control of mitigation associated with retained National Grid infrastructure, including which planting would transfer to NGET, the maintenance obligations applying after East Pye's decommissioning, and the mechanism securing those obligations for as long as the retained infrastructure remains.
- Provide a field- and component-specific Agricultural Land Classification and BMV schedule for Site 1A–1D and associated grid works, distinguishing temporary disturbance, long-term occupation and permanent loss caused by substations,

foundations, piling, access, drainage, construction compounds, pylon works and retained infrastructure. Explain whether the later identification of Grade 2 BMV land caused the earlier site-selection conclusions to be reconsidered and, if not, why not. [APP/6.1.15; APP/6.3.15.1]

- Provide a Site 1 landscape and residential visual reconciliation, assessing the combined National Grid Substation, Project Substation, solar arrays, pylons, fencing, security infrastructure, access and mitigation rather than treating those elements independently. Provide verified plans and representative visualisations from the most affected Great Moulton receptors and PRow, with coordinates, camera position, lens/focal-length information and measured relationships to the development envelope. [APP/6.1.7; APP/6.3.7.9]
- Demonstrate the cumulative operational noise effects of the complete Site 1/BESS electrical infrastructure cluster, including the National Grid Substation, Project Substation, BESS, transformers, inverters, switchgear and cooling equipment. The assessment should identify the final or maximum plant assumptions, representative quiet night-time conditions, tonal and low-frequency characteristics, mitigation relied upon and the combined noise limit applying to the completed development. [APP/6.1.12; APP/7.2]
- Secure post-installation acoustic verification and corrective mitigation, so that compliance is demonstrated using the equipment actually installed and operated. The control should address tonal, low-frequency or otherwise distinctive noise as well as overall A-weighted sound levels and should prevent later plant replacement from exceeding the assessed envelope.
- Provide a consolidated Site 1 groundwater and Private Water Supply Source–Pathway–Receptor assessment, covering PWS identification, baseline water quality and yield where required, piling and deep foundations, cable trenches and trenchless works, transformer oils, contaminated runoff, drainage, monitoring, trigger levels and alternative-supply arrangements. [APP/6.1.9; APP/6.1.16; APP/7.1]
- Demonstrate before relevant works commence that deferred ground investigation and Foundation Works Risk Assessment requirements refine an environmentally acceptable design rather than determine post-consent whether an acceptable solution is achievable. Identify the limits on piling, foundation design and penetrative works that protect groundwater and PWS receptors. [APP/7.1]
- Provide a coordinated drainage, pollution-prevention and emergency-containment plan for the Site 1 Grid Hub, distinguishing clean surface water from potentially contaminated drainage and addressing transformer-oil containment, extreme rainfall, exceedance routing, containment-system failure and interaction with BESS firewater where relevant.

- Provide a definitive construction, abnormal-load and operational-access schedule for Site 1, reconciling Station Road, Frith Way, Lodge Road, Hundred Lane/RB19, A01/A02 and all other relevant accesses and haul routes. It should identify the purpose of each route, vehicle type, frequency, construction or operational use, temporary or permanent status, necessary highway works, PRow crossings and emergency-access arrangements. [APP/6.1.11; APP/6.3.11.1; APP/7.6]
- Confirm the purpose and permanence of the Hundred Lane/RB19 crossing and any other retained maintenance access. Where an access is required for infrastructure intended to remain beyond the solar operational period, that potentially indefinite use should be identified and assessed accordingly; where it is not required after decommissioning, the restoration obligation should be secured.
- Provide a Site 1 PRow reconciliation schedule covering FP13, FP14, RB19/Hundred Lane and all other affected routes, identifying closure periods, crossings, permanent access use, vegetation removal, safety controls, residual visual effects and restoration. The assessment should address the PRow network as a connected recreational and landscape resource rather than only as individual route segments. [APP/6.3.7.9; APP/7.8]
- Demonstrate that the final Site 1 grid-infrastructure layout remains within the ecological assessment, including hedgerows, trees, ponds, ditches, bat flight lines and dark corridors, breeding birds, great crested newts and other protected species. Identify any licensing dependencies and demonstrate that access, drainage, lighting, fencing and final infrastructure locations do not undermine mitigation or ecological connectivity relied upon in the ES.
- Provide a coordinated operational-lighting and security plan for Site 1, showing permanent, maintenance and emergency lighting; CCTV locations and heights; switching and control arrangements; spill limits; ecological dark corridors; residential receptors and PRow. Assumptions that lighting will be temporary, exceptional or inward-facing should be secured where relied upon by the environmental assessment.
- Provide an integrated Site 1 emergency-response statement, prepared with NGET and the relevant emergency services where appropriate, covering the National Grid Substation and Project Substation as well as the BESS interface. It should address transformer and electrical incidents, firefighting access, water supply, oil and contaminated-water containment, cordons, road restrictions, emergency access and the responsibilities of each operator.
- Demonstrate that EMF exposure from the final combined infrastructure remains within the assessment and applicable public-exposure standards, showing the relevant overhead lines, underground cables, substations and nearby residential and PRow

receptors, and identifying any design assumptions or minimum separation distances relied upon.

- Provide a consolidated utilities and service-protection schedule identifying existing electricity, telecommunications, broadband, water, drainage and other infrastructure affected by Site 1 works, together with protection/diversion arrangements, responsible bodies, emergency repair procedures and service-continuity measures.
- Provide a place-based cumulative assessment for Great Moulton and the Site 1/BESS infrastructure cluster, bringing together landscape and visual effects, operational noise, lighting, access and traffic, PRoW, ecology, heritage, water, agricultural land, safety and residential amenity. The assessment should include construction, operation, foreseeable replacement activity, decommissioning and the retained National Grid infrastructure rather than limiting the assessment to individual technical chapters.
- Provide a whole-life infrastructure and replacement schedule identifying reasonably foreseeable replacement of transformers, switchgear, electrical plant, solar equipment and BESS equipment and demonstrating that associated abnormal loads, traffic, lifting operations, noise, temporary compounds and other construction-type effects remain within the assessed and secured envelope.
- Provide a consultation and design-change audit for Site 1, identifying material changes between Scoping, statutory consultation, targeted consultation and the DCO application, including changes to the National Grid Substation, Project Substation, pylon/OHL works, access, cable routes and the relationship with the BESS. For each material change, identify the affected receptors, additional assessment undertaken and consultation carried out.
- Demonstrate the necessity and proportionality of the land and rights sought for Site 1 and the Grid Connection Infrastructure, including land and rights required for permanent National Grid infrastructure, temporary works, access, PRoW, utilities and mitigation. Where the final NGET design remains flexible, explain how the compulsory-acquisition case remains no more extensive than reasonably required.
- Provide a change-control schedule requiring consequential documents to be updated where the Grid Hub design changes. Any material change to the National Grid Substation, Project Substation, BESS relationship, overhead-line/pylon works, cable routes, access, drainage or mitigation should identify whether revisions are required to the Works Plans, Land Plans, draft DCO, Book of Reference, Grid Connection Statement, LVIA/RVAA, noise assessment, drainage/FRA, water assessment, ecology/BNG evidence, heritage assessment, soils assessment, traffic assessment, aviation/glint-and-glare material, LEMP or compulsory-acquisition documentation.

- Finally, provide one consolidated Grid Infrastructure Compliance Schedule identifying each material commitment relied upon to conclude that significant effects are avoided or mitigated, the document in which it appears, whether it is secured by the DCO, the approving authority, the stage at which approval is required, the objective standard to be achieved, monitoring and verification arrangements, and the corrective action required if the commitment is not achieved.

Concluding Request

BEPS-Great Moulton does not ask the Examining Authority or local residents to design the Scheme or to reconstruct the Applicant's case from dispersed documents. The Applicant, with NGET where relevant, should demonstrate through the coordinated information above that the Site 1 Grid Hub and associated Grid Connection Infrastructure are sufficiently defined, justified, assessed and secured within an enforceable environmental envelope.

Where information remains dependent upon later detailed design, East Pye should identify the assessed worst case and the binding DCO control that prevents the eventual design, construction or operation from producing effects greater than those examined. Where the final NGET connection solution could materially alter the land, infrastructure or effects now before the Examination, East Pye should demonstrate that the present consent and land powers remain justified before those powers are granted.

Where East Pye relies upon mitigation, a design assumption, an indicative layout, a future management plan or a later approval process in order to reach a “not significant” or otherwise acceptable conclusion, East Pye should identify precisely where that safeguard is secured, the assessment envelope within which it must remain, who is responsible for approving and implementing it, and how compliance will be demonstrated, monitored and enforced.

The central requirement is that East Pye and NGET should demonstrate the final proposition they seek consent for, show that it remains within the assessed worst case, identify the mechanism by which each material safeguard is secured, and provide an auditable means of verifying compliance.

Chapter 1 Introduction



1.1 Summary of the Historic Landscape of Great Moulton (Moulton St Michael)

Great Moulton should be understood as a historic rural settlement within an open agricultural plateau, not merely as a set of individual receptors. The lanes, PRoW, field boundaries, scattered farmsteads and views form part of the historic and community setting in which the Scheme would be experienced.

Hundred Lane – an Early Administrative Boundary

Hundred Lane reflects the boundary of Depwade Hundred and marks a long-standing territorial division. Medieval settlements were commonly positioned near such boundaries, and the proximity of Hundred Lane to The Sanctuary supports the identification of this area as the core of Little Moulton.

Narrowgate Way – the Medieval Street Line

Narrowgate Way preserves the original street line of the lost village. In Norfolk, gate derives from Old Norse gata, meaning street. Its narrow, bending alignment is characteristic of a medieval village street leading to a church or central cluster of dwellings. Its position directly adjacent to The Sanctuary confirms its role as the main route to Little Moulton.

Photos of the orchids that are prevalent on Hundred Lane this historic right of way.



Frith Way – the Woodland Edge

Frith Way preserves the line of the medieval woodland boundary. The name derives from Old English frith, meaning woodland or wooded pasture.

Broadgate Lane - The Wider Continuation of the Ridge Route

Broadgate Lane, Narrowgate Way, Frith Way, Hundred Lane, and The Sanctuary together form a well-preserved medieval landscape marking the site of Little Moulton and its vanished church, All Saints. Their historic alignments and enduring tranquillity give the area exceptional archaeological, spiritual, and heritage value, making any development here a serious risk to one of the parish's most significant historic environments.

The Lanes and Road Ways are not incidental features. They are part of the surviving rural route network, and their value lies in alignment, vegetation, quietness, openness, public use and relationship with the wider agricultural landscape. A retained legal PRow line is not the same as retaining the character and amenity of the route.

Where the Scheme proposes haul-route crossings, permanent maintenance access, vegetation removal, screening belts, fencing, lighting or operational traffic around these routes, the assessment should address the physical, visual, recreational and historic change together.



1.2 Great Moulton: Landscape, Heritage and Community

Great Moulton's rural character is defined by its unaltered medieval field patterns and routeways, sitting within the South Norfolk Claylands, it is one of only three Plateau Farmland areas in the district, giving it a landscape of exceptional distinctiveness and sensitivity. The plateau's flat, elevated form, large arable fields, open horizons and sparse settlement pattern create long views and a strong sense of exposure..

The lost settlement of Little Moulton survives through its landscape form—an exceptionally rare continuity that makes the area sacrosanct in heritage

terms. Visitors and pilgrims value its tranquillity, openness and sense of spiritual calm, consistent with NPPF § 174 (a) and (b) on conserving landscape character and heritage assets.

The parish’s historic continuity is remarkable. It appears in the Domesday Book (1086) with over 70 households under Count Alan of Brittany. St Michael’s Church retains Romanesque masonry from its early construction, and nearby timber-framed houses and moats such as Old Boyland Hall and Wacton Hall reflect the medieval landscape.



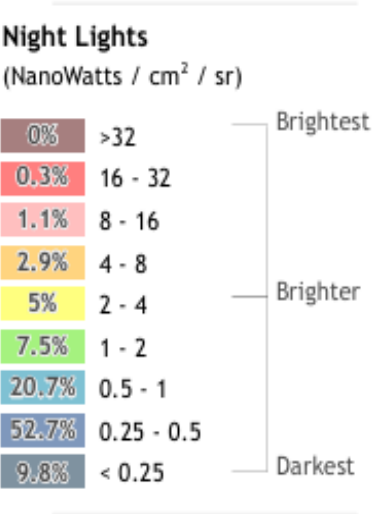
Great Moulton residents rely on the surrounding countryside for daily amenity, farming, access, walking, cycling, horse riding, wellbeing and community identity. The significance of harm therefore lies, not only in isolated views, but in the transformation of the village edge and its quiet rural setting.

Dark Skies and Amenity

Great Moulton Falls within England’s Light Pollution and Dark Skies Zone B where policies require minimal light spill and protection of nocturnal species.

The proposed scheme’s artificial illumination would conflict with these requirements, eroding the dark-sky quality and rural tranquillity that define the parish

The proposal would therefore fail to meet the tests of sustainable development under NPPF 8, § 174 and 185, and should be resisted on grounds of landscape, heritage and amenity impact.



The Site 1 grid hub would introduce an industrial energy character into a landscape currently defined by open farmland, low settlement density, long views, dark skies and a strong sense of rural separation.

This is a material planning consideration even where individual technical chapters predict no significant effect.

Chapter 2 Environmental Impact Assessment

Methodology & Scheme Flaws

Introduction

The applicant states the EIA follows the usual sequence of baseline, embedded mitigation, assessment of likely effects, additional mitigation, residual and cumulative effects/in combination effects. It also uses the Rochdale Envelope approach because not all technical details have been determined at application stage. The methodological issue for Site 1A-1D is therefore not the absence of an EIA framework, but the final layouts remain controlled by maximum parameters, minimum offsets and later detailed design, whether the field-level baseline and design assumptions are sufficiently specific and secured for a worst-case conclusion to remain robust after detailed design.

The difficulty for Site 1 is that this broad methodology is only as reliable as the site-specific evidence beneath it. In several places, the ES identifies sensitive features at or close to Site 1, but then relies on generic design principles, future detailed design, outline management plans, or broad judgements of “not significant” without adequately explaining the local harm to Great Moulton residents, PRow users, landscape character, bats, ponds, ditches and heritage setting is acceptable.

East Pye defines Site 1 comprising of approximately 73.6 ha (181 areas) comprising:

1A – 7.7 ha (19.02) acres – TM 16678 89158

1B – 48.2 ha (119.10 acres) – TM 17091 89199

1C – 13.9 ha (34.35 acres)– TM 16676 88715

1D – 3.8 ha (9.39 acres) – TM 17224 88509. [NSIP Documents](#)

There is no separate single centred NGR stated for the whole 73.6 ha Site 1 the Applicant provides one for each sub-site.

East Pye's own evidence establishes Site 1 as a large, open agricultural landscape on a flat elevated plateau, with expansive skies and a recognised PRow network. It acknowledges nearby homes and the village edge of Great Moulton, predominantly Grade 2 agricultural land north of Hundred Lane, and a range of landscape, recreational and environmental constraints. [NSIP Documents](#)

East Pye then at the Targeted Consultation Site 1B became the location for the National Grid Substation, 400 kV Project Substation and associated OHL/grid infrastructure, with the Applicant explaining the choice principally through proximity to the 400 kV line, flood-risk and PRow comparisons with Option 4A, existing vegetation and grid/technical requirements. [NSIP Documents](#)

Most significantly, East Pye's own landscape assessment concludes that the construction of Site 1 would cause a Major Adverse Significant effect, describing the development as a substantial change to the site's key landscape characteristics and identifying the scale of the proposed activity as uncharacteristic of its existing agricultural use.

(its difficult to write and research this document without understanding the rationale, behind the choice, to state categorically this will destroy our village but still go ahead)

The EIA should enable the ExA to understand the likely significant effects of the development as a whole. For Great Moulton, that requires integration across scheme description, alternatives, landscape, PRoW, ecology, water, transport, noise, safety, health, agricultural land and cumulative effects.

The principal flaw is fragmentation. Effects are divided across documents, while the village experiences one combined infrastructure hub.

The ExA should require The Applicant to provide a parcel-by-parcel infrastructure schedule for Site 1A-1D, with work number, component, maximum dimensions, footprint, temporary/permanent status, delivery body, decommissioning position and relevant control document and identify every **environmentally material parameter still flexible at site 1 and the exact requirement/commitment that prevents a later layout from creating effects outside the assessed envelope.**

2.1 Missing Private Water Supply Surveys and Consultation

This area falls under the Environmental Agency for Drinking Water Protection (Surface), Many of the the homes within the Great Moulton area rely on private wells and boreholes. Many of these supplies are shallow, not formally mapped, and don't have much protection. That makes them especially vulnerable to anything that disturbs the ground — trenching, drilling, piling, or the construction of BESS compounds.

Private water supplies should be treated as sensitive receptors requiring positive identification, baseline condition and contingency planning where credible pathways exist. This is particularly important for cabling, piling, drainage, substation hardstanding, transformer oils, BESS firewater and construction compounds.

The ExA should require the Applicant to provide a PWS schedule for receptors within the relevant study area, including whether owners have been consulted, whether baseline quality and yield testing is proposed, and what alternative supply or compensation arrangements would apply if harm occurs.

2.2 Missing Ecological Surveys, Mapping or Consultation

Ecology must be assessed against the final infrastructure envelope, not only against broad solar-parcel assumptions. The final position of lighting, fencing, access roads, haul crossings, vegetation removals, drainage basins and operational areas can materially affect bats, newts, birds, hedgerows and dark corridors.

Where survey data is approaching expiry or does not cover revised areas, the Applicant should confirm how updated survey evidence will be secured before consent or before commencement.

2.3 Telecoms & Emergency Access

Telecommunications and broadband are community-resilience infrastructure in a rural parish. Damage or service loss affects home working, businesses, alarms, medical alerts, education and emergency contact.

The Applicant should provide a consolidated utilities protection plan covering Openreach, Gigaclear, BRN or any community fibre, electricity, water, drains and other affected services, with emergency repair contacts and minimum service-continuity commitments.

2.4 Climate Change

The EIA fails to provide a robust, site-specific assessment of the scheme's resilience to climate change or the potential for the development itself to exacerbate local climate risks. Great Moulton already experiences the effects of more intense rainfall, prolonged dry spells, and higher summer temperatures, and these pressures are projected to increase. A development of this scale must demonstrate how it will perform under future climate conditions, not just current baselines. The EIA also fails to consider whether the introduction of large-scale hard infrastructure could lead to localised overheating, changes in wind patterns, or drought vulnerability affecting adjacent farmland and communities. Great Moulton's agricultural land is already exposed to seasonal water stress, and any reduction in soil moisture or alteration of microclimates could have direct impacts on crop viability, hedgerow health, and the resilience of local wildlife.

The Scheme climate case should cover both greenhouse-gas benefits and adaptation/resilience. The relevant question for Site 1 is whether the grid hub and BESS remain safe and do not worsen local vulnerability under future rainfall, heat, drought and storm conditions.

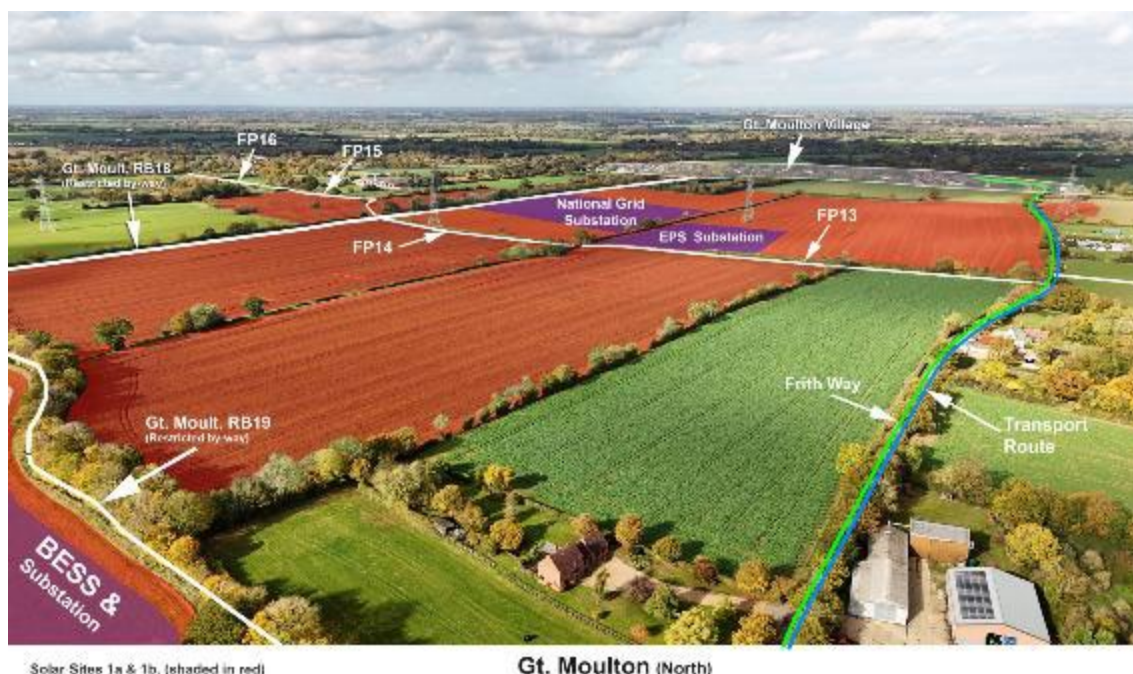
The ExA should require climate-adjusted drainage modelling for substations, BESS hardstanding, tracks, compounds, cable trenches and panel areas, including exceedance routing and combined firewater / flood scenarios.

2.5 Missing Analysis of Views from Listed Buildings or Impacted Homes

The scale of the proposed changes is substantial, yet the submission significantly downplays the level of disruption and environmental harm that would be brought to the village of Great Moulton. The infrastructure would in some instances be circa. 25m from their garden/land boundaries, with increased pylon and substation heights, 4.5-metre solar panels, security fencing, lighting columns, and surveillance cameras.

This configuration appears to have been developed without meaningful consideration of the local community or the sensitivity of the surrounding landscape. The proximity and sheer massing of this industrial infrastructure would cause severe and long-term disruption to residents' daily lives, eroding residential amenity, tranquillity, and the rural character of the plateau.

The impacts extend beyond people. The plateau supports a range of wildlife that relies on its



open, connected habitats. The introduction of tall, dense, and illuminated structures would fragment these habitats, displace species, and fundamentally alter the ecological function of the area.

Taken together, the proposal would transform a rural landscape into an industrialised zone, with consequences that have not been adequately assessed, mitigated, or justified. The community and its environment deserve far more rigorous consideration than this scheme currently provides.

The residential visual issue should be resident-led. A village-edge view toward a 400 kV grid hub, palisade fencing, security equipment, pylon works and substation plant is qualitatively different from a view toward solar panels alone.

The ExA should require verified photomontages or representative visualisations from Oak Lodge, Laburnham Farm, Potters Crescent, the south side of High Green, Frith Way, Hundred Lane and relevant PRow locations.

2.5.1 Oak Lodge, High Green, Great Moulton

Oak Lodge should be assessed as a sensitive receptor potentially affected by proximity, outlook, construction activity, operational noise, lighting, security fencing and the perceived industrialisation of the village edge. A plan-only separation distance does not capture the actual residential experience.

The Applicant should identify whether this receptor is included in the Residential Visual Amenity Assessment, noise assessment, glint / glare assessment and construction traffic / dust assessment, and if not, explain why it was excluded.



2.5.2 Laburnham Farm House, High Green, Great Moulton

Laburnham Farm House and associated land uses should be considered for visual, noise, amenity, ecological and agricultural effects, including impacts on gardens, outdoor use, apiaries, livestock or rural business activities where relevant.

The Applicant should identify whether this receptor is included in the Residential Visual Amenity Assessment, noise assessment, glint / glare assessment and construction traffic / dust assessment, and if not, explain why it was excluded.



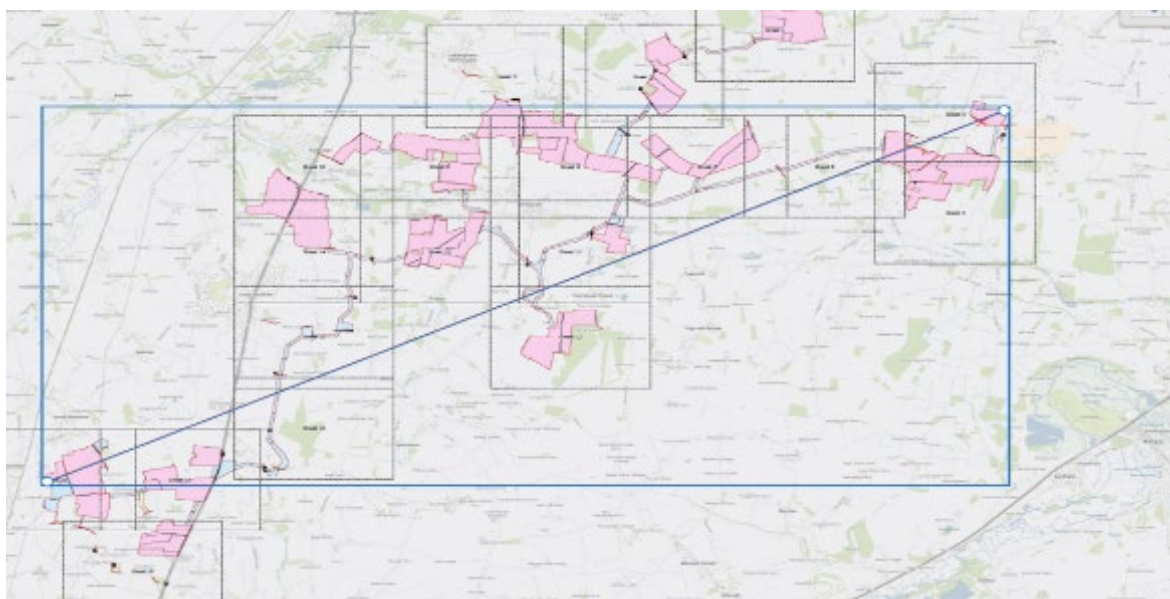
2.5.3 Potters Crescent

Potters Crescent should be assessed not only by distance to the substation footprint but by the combined appearance and activity of the National Grid Substation, 400 kV Project Substation, pylons, access and construction phase.





Chapter 3 The Order Limits- Site and Surroundings



3.1 Site Selection, Retention and Reasonable Alternatives

East Pye Solar state in their Site Selection Assessment document APP/7.20 / APP215 sets out a site selection methodology and identifies policy preferences, therefore we do not state that East Pye did not undertake any site selection exercise.

Our issue is narrower, how that strategic methodology was then translated into later inclusion and retention and refinement of Site 1 and sub-sites 1A-1D following the change in the Point of Connection.

APP/7.20 records that The Applicant has not undertaken a detailed assessment of every unconstrained agricultural parcel. Instead, it focused in large part upon large landholdings identified through land agents as having potentially willing landowners and ultimately upon land which landowners were willing to make available.

APP/7.20 also records that the land originally coming forward for solar development comprised eight sites elsewhere and that Sites 1 and 2 were subsequently added after the Point of Connection had been identified on land south of Great Moulton. The Applicant further records that land availability was an important consideration and that some potentially suitable alternative land was not progressed because it had not been made available to the Applicant.

This may be a legitimate factor, for land availability, deliverability and commercial. However, this is not the same as environmental suitability. The examination issue is therefore not whether a site-selection exercise took place, but whether the submitted evidence allows the ExA to understand clearly:

- why each of Sub-Sites 1A, 1B, 1C and 1D was added once the Point of Connection changed;
- what environmental, technical, land-availability and commercial considerations were applied to each parcel;
- why each parcel remained necessary as the design evolved and environmental constraints became better understood; and
- whether reasonable opportunities to avoid or reduce effects through parcel deletion, whole-field removal, further reduction or use of other reasonably available land were considered.

We would submit that this distinction is particularly important because the level of explanation is not the same for all parts of Site 1.

Requested Examination Action

BEPS therefore asks the ExA to consider requiring the Applicant to provide one consolidated and auditable Site 1 selection and design-evolution schedule, drawing together information presently dispersed across APP/7.20, ES Chapter 5, the Design Approach Document and the relevant technical assessments.

The schedule should identify, for each of Sub-Sites 1A, 1B, 1C and 1D:

1. When and why the parcel entered the Scheme, including its relationship to the change in the Point of Connection.
2. The function and development proposed within the parcel, distinguishing solar generation land from National Grid infrastructure, Project Substations, Grid Connection Infrastructure, overhead-line works, cables, access, mitigation or other uses.
3. The environmental, technical, operational, commercial and land-availability criteria applied, together with sufficient explanation to understand how those considerations influenced the decision to select and retain the parcel.
4. The principal constraints subsequently identified through environmental assessment, consultation and design evolution, and the design changes made in response.
5. The reasonable design alternatives considered after those constraints became known, including where relevant further reduction, removal of individual fields or parts of fields, deletion of the parcel, relocation of infrastructure and use of other reasonably available land.
6. For Sub-Site 1B specifically, an integrated explanation of why the selected location remains appropriate when the cumulative presence of the National Grid Substation, Project Substation infrastructure, Grid Connection Infrastructure, overhead-line works,

access requirements and the adjoining BESS is considered together, rather than solely through the earlier comparison between National Grid Substation Options 4A and 4B.

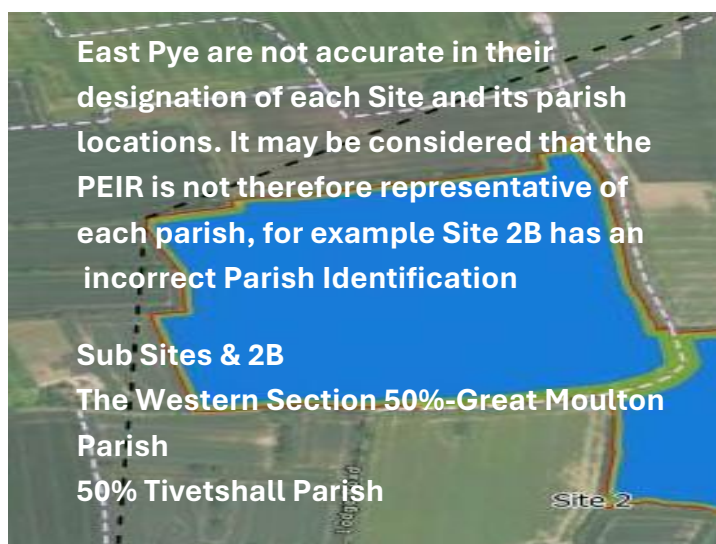
7. A clear distinction between land which was environmentally or technically unsuitable and land which was potentially suitable but was not available to the Applicant.

This would not require the Applicant retrospectively to demonstrate that Site 1 was the theoretical “best” or “least harmful” site. Rather, it would allow the ExA to understand the Applicant's actual decision-making process and determine whether the reasonable alternatives that were studied, and the subsequent decisions to retain and refine Sites 1A–1D, have been explained with sufficient environmental and design justification.

Source basis: APP-215 / APP/7.20 Site Selection Assessment, particularly sections addressing the National Grid Substation and Point of Connection alternatives, solar site-search methodology, landowner availability, Potential Development Areas and Alternative Development Zones, and the later addition of Sites 1 and 2; APP-041 / APP/6.1.5 ES Chapter 5 – Reasonable Alternatives and Design Evolution; and APP-212 / APP/7.17 Design Approach Document.

3.2 Site Selection, Location and Context

The Order Limits create a long linear scheme, but the Great Moulton objection concerns the western concentration of infrastructure. Site 1 and the BESS cannot be understood by reading individual parcels in isolation.



Drone shot shows proximity of solar fields & national grid substation to Great Moulton



3.3 National Grid Connection Point

The Grid Connection Statement describes a new National Grid Substation and associated 400 kV connection infrastructure. The source draft records NGET as qualifying the certainty of the final connection solution.

The NetG representation raises the doubt.

We would therefore ask the Planning Inspector to raise any concerns regarding NetG's response.

“Representation by Bryan Cave Leighton Paisner LLP on behalf of National Grid Electricity Transmission Plc Date submitted 10 June 2026

Netgrid state It is important to note in this context that it is NGETs understanding that the new connection agreement will not include the requirement for the Applicant to secure land or consent for the National Grid Substation.

National Grid remains committed to constructive engagement with the promoter as their project develops and the notification of a Gate 2 offer for their solar component of the project demonstrates that engagement will be ongoing to project delivery.

In the Applicant's Grid Connection Statement, it is stated that there are responsibilities for NGET to design and construct the National Grid Substation.

For the avoidance of doubt, should the Applicant receive consent for the National Grid Substation as part of the Order, this does not trigger or constitute any obligation for NGET to accommodate any connection to the national grid at such a substation. The wider regulatory and commercial context needs to be fully considered and worked through before the location of the new substation can be confirmed.

Although the Connection Reform process is still ongoing, all customers with a Gate 2 offers will, in part, influence the final size, design and location of the final point of connection solution. However, until those Gate 2 offers have been finalised, NGET cannot confirm what that solution will be but must always act in accordance with its statutory duties to provide an economic and efficient connection network.”

This makes the precise scope, deliverability and responsibility for the grid works a central examination issue.

3.3.1 Connection status and consequences for Site 1B

The NGET material quoted above distinguishes the Gate 2 offer for the solar component from the wider connection solution. BEPS's Consolidated Summary of Written Representations records that the associated BESS remains at Gate 1, with no confirmed indicative connection date. That distinction does not establish that the BESS will not ultimately connect; it does mean that the solar generation and BESS should not be assumed to have identical connection rights, timing or delivery certainty.

This matters because the Application relies on the BESS for storage, flexibility and wider system benefits.

The Examining Authority should require the Applicant to identify separately the current connection status of the solar generation and BESS; the import and export rights presently secured for each; whether the BESS operating case assessed in the Application remains valid if it remains at Gate 1; and what changes if the BESS is delayed, reduced or does not secure the anticipated connection rights.

NGET's position also has a direct consequence for necessity. If the replacement connection agreement is not expected to require East Pye to secure land or consent for the proposed National Grid Substation, DCO consent would not oblige NGET to use that substation, and the final connection solution remains unresolved, **the Examining Authority should establish why permanent authorisation and land powers for this particular Site 1B solution are necessary now.**

The Applicant should therefore demonstrate that the environmental assessment, site-selection case, land take and compulsory acquisition case remain robust if NGET's eventual connection



solution differs materially from that currently shown.

3.4. Targeted Consultation - October 2025

The consultation undertaken for the East Pye Solar Project was not adequate because consultees were repeatedly asked to engage with a scheme that was neither stable nor accurately described. The statutory consultation proceeded on the basis of an incomplete and evolving design, with errors in parish identification, land-interest mapping, and scheme

description that were only corrected after the consultation had closed. The Applicant's subsequent targeted consultations—including Lime Down, Pulham Market, and Framingham Earl—demonstrate that significant areas and receptors were not properly identified at the statutory stage. These post-hoc exercises relied on short brochures and partial updates rather than a revised PEIR, materially limiting consultees' ability to understand the environmental significance of the changes. The consultation record therefore shows that affected communities were not given a fair or informed opportunity to comment on the actual scheme now before the Examining Authority. As a result, the Applicant cannot rely on its consultation history as evidence of compliance with the requirements of Chapter 2 of Part 5, and the adequacy of consultation remains a live and unresolved issue.

3.5 Key objection points arising from the Order Limits material

The Order Limits material supports the characterisation that Site 1 is not merely a solar field, but as a grid infrastructure hub.

Work numbers, land rights, access routes, pylon works and mitigation land should be scheduled together so the ExA can see what is temporary, permanent or retained.

3.6 Nearby Residential Dwellings – Sites 1A to 1D and the BESS

The Site and Surroundings chapter also identifies nearby homes at Great Moulton, individual dwellings close to Sub-Sites 1A and 1B. Nearby dwellings should be listed in one schedule showing distance to panels, substations, BESS, access tracks, cabling, haul routes, compounds, lighting and construction works. The absence of this environmental schedule makes the local effect harder to test.

3.7 Grade 2 BMV Land

The Order Limits record that all of Site 1 north of Hundred Lane is ALC Grade 2, that the National Grid Substation would permanently remove 6.1 ha of Grade 2 land, and that both the Project Substation in Sub-Site 1B and the Project Substation in the BESS Site would also be on Grade 2 land. The BESS itself is also proposed on Grade 2 land, with East Pye expressly acknowledging that the BESS Site is essentially all Grade 2 quality.

We submit that the Applicant should not rely on general renewable-energy needs to avoid a precise assessment of permanent and long-term agricultural land loss.

3.8. Plateau Farmland Sensitivity to Industrialisation

The Great Moulton plateau is sensitive because of openness, long views and low levels of built form, its character depends on uninterrupted skylines and the legibility of historic field patterns.. Once industrial elements are introduced into Plateau Farmland, the sense of openness and rural scale is permanently altered, and the landscape can no longer function as a coherent agricultural plateau.

Future planting may screen elements over time but will also alter the appearance, function, and cultural identity of Great Moulton's rural environment. open character. Screening is mitigation, not avoidance.



Views from local houses where both the 400Kv national grid substation and 400kv project substation are sited.

The final submission should include verified plans showing the relationship between the nearest property boundaries, gardens, PRow and the National Grid Substation / 400 kV Project Substation envelope.

In the meantime the ExA has requested a plan showing an estimate of the proposed distances to the curtilage of properties whose boundaries are adjacent to the proposed POC Substation.



Chapter 4: The Scheme

4.1 Permanent versus Temporary Effects – Site 1 and the BESS

One of the central concerns is the repeated description of East Pye as a broadly temporary and reversible development, when East Pye's own documents establish an important distinction between the solar/BESS elements and the National Grid infrastructure.

ES Chapter 4 confirms that, following the approximately 60-year operational period, the solar generating infrastructure, BESS and Project Substations are intended to be decommissioned, whereas the National Grid Substation and **Grid Connection Infrastructure are to remain in situ**. Relevant mitigation planting associated with the National Grid infrastructure would also transfer to National Grid for continuing management.

That distinction matters.

An effect which ends because equipment is removed and agricultural land restored is fundamentally different from an effect created by major transmission infrastructure which remains beyond Year 60 with no equivalent decommissioning date identified.

The same issue arises at **Hundred Lane/Great Moulton RB19**. East Pye's PRow Visual Amenity Assessment identifies a haul-route crossing which is also intended to provide permanent maintenance access. It records vegetation loss at the crossing and assesses effects on users as Major Adverse and Significant during construction and at Year 1, remaining Moderate Adverse and Significant at Year 15. Screening retained infrastructure is not the same as removing it.

BEPS therefore asks:

Can the ExA request the Applicant and NGET to confirm the anticipated operational life of the National Grid Substation and retained Grid Connection Infrastructure, and whether any decommissioning date is secured outside this DCO?

- If there is no secured end date, should the retained National Grid infrastructure and the access needed to serve it be assessed as a **permanent landscape presence**, rather than being presented within the wider narrative of a 60-year temporary Scheme?
- Has a post-Year-60 landscape assessment been provided which clearly shows what would remain once the solar panels, BESS and Project Substations have been removed?
- What landscape mitigation would transfer to NGET, for how long would it be maintained, and what mechanism would ensure that the retained infrastructure remained adequately screened?
- Finally, if the Hundred Lane/RB19 crossing is required only for infrastructure removed at Year 60, will it also be removed and the lane fully restored? If it is required for the retained National Grid infrastructure, its potentially indefinite effect should be clearly identified and assessed as such.

Relevant East Pye documents:

APP/3.1 Draft Development Consent Order; APP/6.1.4 ES Chapter 4 – The Scheme; APP/6.1.7 ES Chapter 7 – Landscape and Visual; APP/6.3.7.9 PRoW Visual Amenity Assessment; APP/6.4 ES Non-Technical Summary; APP/7.3 Outline Decommissioning Environmental Management Plan; APP/7.4 Outline Landscape and Ecology Management Plan; APP/7.8 Outline PRoW and Permissive Paths Management Plan; APP/7.18 Design Principles, Parameters and Commitments; APP/7.26 Commitments Register.

4.1.1 Whole-life replacement activity

The 60-year operational period should not be treated as one construction phase followed only by routine maintenance.

BEPS's consolidated evidence records that the Scheme permits complete panel replacement over a period of up to 24 months, up to five BESS replacement cycles, and major transformer and electrical replacement during the operational life.

For Great Moulton, those foreseeable replacement cycles may bring renewed abnormal loads, HGV movements, lifting operations, temporary compounds, noise, waste removal and construction-type disturbance. **The environmental assessment and DCO controls should therefore show how recurring whole-life replacement activity has been assessed and controlled, rather than treating the principal construction effects as a one-off event.**

4.2 Site 1B - National Grid Substation And 400kv Project Substation

Sub-Site 1B should be recognised as the principal grid hub for the western part of the Scheme. It contains the proposed National Grid Substation and 400 kV Project Substation and is functionally connected to Sites 1A–1D, the BESS, cable routes, pylon works and access infrastructure.

Our concern is that the Applicant has not yet demonstrated that the combined operational effects of this infrastructure will be acceptable for nearby residents, particularly in relation to **noise**.

Great Moulton has a very low rural background sound environment. The Applicant therefore needs to demonstrate clearly the cumulative effect of transformer hum, switchgear, BESS cooling equipment, inverters, fans and other electrical plant, including appropriate corrections for tonal or intermittent characteristics. The concern is not simply individual items of equipment, but their **combined 24-hour operational effect**, particularly at night.

The submitted material does not provide residents with a clear understanding of what this concentration of infrastructure will look and sound like once operational. There is also no single, easily understood plan or schematic showing the complete grid hub and its relationship with nearby homes.

This uncertainty is particularly important because the Scheme relies on a **Rochdale Envelope**. Where the final plant layout, technology, lighting, drainage, access or overhead-line works remain flexible, the worst-case effects must be clearly assessed and secured through the DCO so that the final development cannot create greater impacts than those examined.

We therefore ask the Examining Authority to require the Applicant to demonstrate, in one clear and auditable assessment, the combined operational noise and environmental effects of the National Grid Substation, Project Substation, BESS and associated electrical infrastructure on Great Moulton residents, together with the controls that will ensure those effects cannot increase at detailed design stage.

4.2.1 Rochdale Envelope- scenario testing

The relevant test should not be confined to whether the Applicant's preferred configuration falls within the assessed envelope. The Applicant should demonstrate that every realistically permitted implementation scenario - including solar-only operation, delayed or reduced BESS, altered National Grid connection works, different detailed substation layouts and replacement technologies - remains within the environmental effects actually assessed and secured by the DCO.

Where a permitted scenario could alter land take, access, noise, lighting, drainage, fire safety, landscape effects or compulsory acquisition requirements, the Examining Authority should be shown the assessed maximum case and the specific DCO control that prevents the detailed design from exceeding it.

4.3 Area and location

- Sub-Site 1B forms part of Site 1. Site 1 totals approximately 73.6ha;
- Sub-Site 1B is approximately 48.2ha, centred on NGR TM 17091 89199.

The ExA should require The Applicant to provide a parcel-by-parcel infrastructure schedule for Site 1A-1D and the BESS, with work number, component, maximum dimensions, footprint, temporary/permanent status, delivery body, decommissioning position and relevant control document.

MAIN OPERATIONAL USE

The operational use is not merely electricity generation; it includes transmission-interface infrastructure, monitoring, export, import for BESS charging, switching, maintenance and retained grid works.

New National Grid Substation

The new National Grid Substation is the element that makes Site 1 a long-term grid node

- The new National Grid Substation is located within Sub-Site 1B and would be owned/operated by National Grid.
- It is required at the Point of Connection to connect the 400kV Project Substation to the National Grid.
- It monitors and manages exports of electricity.

The ExA should require clarity on NGET responsibility, final connection solution, scope of works, delivery programme and what happens if the connection solution changes.

NATIONAL GRID SUBSTATION PARAMETERS

Parameters should include footprint, building heights, busbar/gantry heights, fence height, access-track width, lighting, drainage, transformer oil containment, temporary works, construction duration and operational maintenance requirements. Including the following:

- maximum compound area 6ha
- access track up to 8m wide
- relay/control rooms up to 7m x 19m and 4.2m high
- foundations may be raft or piles to 12m with 1m pile cap
- 3m palisade fencing.

400KV PROJECT SUBSTATION IN SUB-SITE 1B

The 400 kV Project Substation should be assessed cumulatively with the National Grid Substation. Residents will not experience the two as separate planning effects.

- 400kV Project Substation is proposed in Sub-Site 1B,
- with electrical infrastructure to allow electricity to be exported to the National Grid Substation
- It may include control/relay rooms
- 33kV switch room
- monitoring/maintenance equipment
- welfare/office facilities

400KV PROJECT SUBSTATION PARAMETERS

- Compound perimeter:
- 3m palisade fencing
- plus 2.5m deer-type wire mesh/wooden post fencing outside;
- access up to 6m wide;
- relay/control room
- 33kV maximum compound area 1.1ha

- maximum height 15m to top of busbars
- foundations up to 1m concrete base or piles up to 12m.

The ExA should require confirmation whether gas-insulated or air-insulated switchgear is proposed or retained as an option, and how the worst case for height, footprint, noise, visual clutter, drainage and operational risk has been assessed.

GRID CONNECTION / OVERHEAD LINE WORKS

Overhead-line works and pylon changes are integral to the grid hub. The Applicant should show all proposed tower works, temporary scaffolding, netting, pull zones, outages, construction compounds, access routes and permanent changes on one plan.

- Grid Connection Infrastructure will connect the National Grid Substation to the existing 400kV Norwich Main - Bramford overhead line.
- Chapter 4 refers to a double turn-in of both circuits into the National Grid Substation within Sub-Site 1B,
- up to four new pylons across the Scheme, up to 61m high.

SECURITY AND CAMERAS

Security infrastructure should be assessed for visual effect, lighting, privacy, ecology and rural character. CCTV locations and heights should be fixed or controlled.

- National Grid Substation
- BESS
- Project Substations
- 3m palisade fencing
- Pole-mounted, internal-facing CCTV will be installed around the perimeter of the Sites; maximum CCTV/pole height is 3m generally, but 4.2m for the National Grid Substation.

LIGHTING

Lighting should be assessed against dark skies, bats, PRow users, nearby homes, aviation and emergency scenarios. A "temporary maintenance lighting" assumption should be secured and enforceable

- National Grid Substation lighting is to comply with National Grid standards.
- External components are not expected to require dedicated external lighting
- If maintenance lighting is needed, temporary lighting is used.
- Control-room entrance lighting should emit no upward light.
- National Grid Substation access road will not be illuminated.

DRAINAGE / ATTENUATION

Drainage design should identify clean and contaminated water systems, firewater isolation, penstock failure scenarios, testing, tankering, discharge limits and emergency exceedance routing.

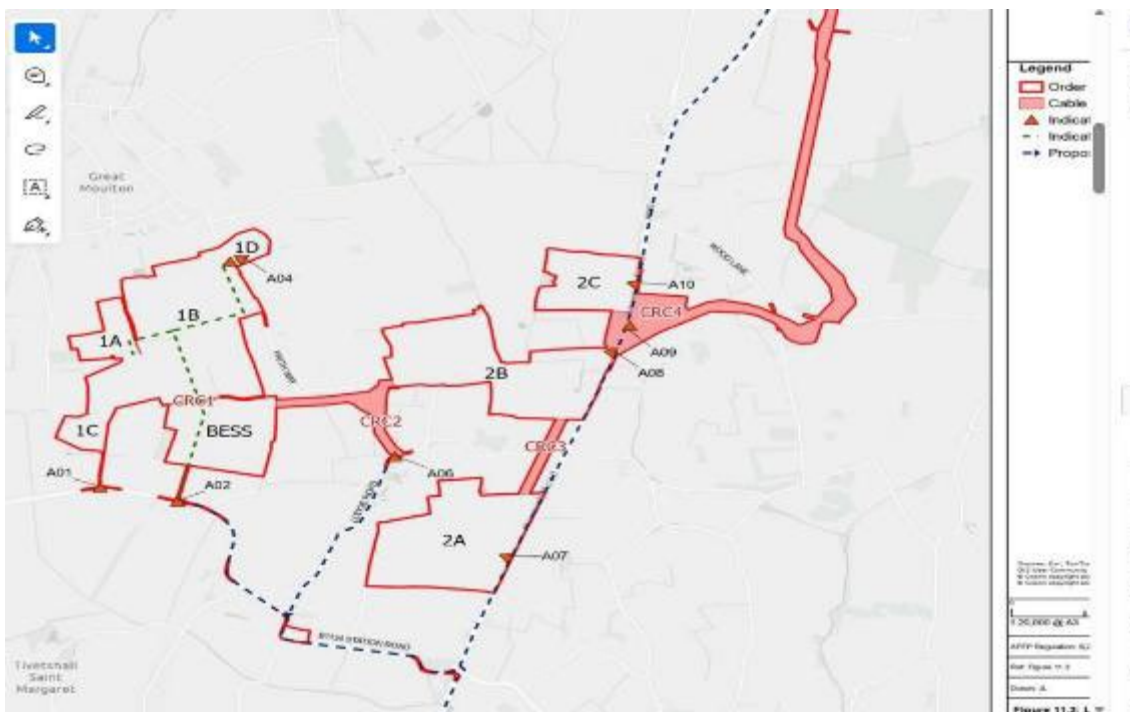
- National Grid Substation drainage is proposed to be lined with an impermeable membrane with controlled discharge.
- Indicative attenuation volume is 7,308-9,246m³, refined to 8,256m³.
- 400kV Project Substation in Sub-Site 1B has revised attenuation of 1,511m³.
- Localised surface-water flood risk around the National Grid Substation and 400kV Project Substation is acknowledged, with a detailed-design solution deferred.

TEMPORARY CONSTRUCTION COMPOUNDS

Construction compounds in Site 1 should be assessed for land take, traffic, noise, dust, lighting, welfare drainage, fuel storage, security and restoration.

- Chapter 15 states two construction compounds are proposed within Site 1B, both on Grade 2 agricultural land. It says almost all of Site 1 is Grade 2 so this is considered unavoidable by the Applicant.
- When the construction work complete, what is the proposed restoration for each of these

ACCESS / HGV ROUTE



HGV and abnormal-load routes should be shown with swept paths, structures, verge protection, traffic management, PRow controls, railway-level-crossing interaction and emergency access arrangements.

- Sites 1A-D and BESS use accesses A01 and A02 via A140/B1134 roundabout, B1134 westbound, then northbound on A01/A02. B1134
- Station Road is described as the key link for access to the National Grid Substation, Project Substation in the BESS Site and Project Substation in Sub-Site 1B.

The Applicant should clarify why document AP095, page 2 it shows Lodge Road as a 2 way Proposed Vehicle Routeing, The map also shows A02 the access point to the BESS and the Indicative 2-way.Internal Routeing. Indicative site access on the red CRC2. A09, A10, A08, A07 as access from the A140 into 2A, 2B and 2C, Route A01 from Station Road in 1C access to the pylons, A04 crossing over Frith Way. Frith Way has no indicative traffic, but the CRC2 highlights definitive use as access. The documents state the cable routes will be used for traffic movements.

LANDSCAPE / PROW CONTEXT

The PRow network should be assessed as a connected recreational and heritage network, not only as isolated paths.

4.4 Grid connection / pylon works

Pylon and overhead-line works should be included in all landscape, heritage, aviation, transport, EMF, ecology and construction assessments.

GRID CONNECTION / PYLON WORKS

- Chapter 3 states underground and/or overhead lines including new pylons between the National Grid Substation and Point of Connection will be located within Sub-Sites 1A-D. Appendix 9.1 states OHL works within Sub-Site 1C comprise
- modification and reconfiguration of the existing OHL, including new pylons
- dismantling of existing overhead lines and pylons

PYLONS

The maximum pylon heights and temporary works should be represented visually from Great Moulton homes and PRow

- Up to four new pylons are assessed across the Scheme,..Three are associated with repositioning existing pylons and up to one is new.
- Pylons may be up to 61m above ground level.

SOILS / LAND ASSUMPTIONS

Unsurveyed or assumed land should be treated conservatively, but the Applicant should not use assumptions to avoid field-specific restoration obligations.

- Chapter 15 records that parts of mitigation/enhancement areas in Sub-Sites 1C and 1D were not surveyed for ALC.
- Works No.5 relates to reconfiguring and installing new overhead lines
- The non-surveyed land is assumed worst-case Grade 2.
- It also says Sub-Sites 1C and 1D are areas within which pylons may be relocated.

SECURITY / LIGHTING

Grid connection work areas should be controlled for temporary lighting, fencing, generator use and overnight security.

- No separate permanent security or lighting regime is described for Sub-Site 1C in the available text, beyond the scheme-wide position
- infrastructure work areas may be fenced during construction
- PV arrays, if present, would use deer fencing/CCTV.
- OHL/pylon works would not normally imply operational lighting.

LANDSCAPE CONTEXT

The landscape context includes the plateau, historic lanes, PRoW, village edge and intervisibility with surrounding settlements.

- Appendix 7.2 states Sub-Site 1C spans two fields
- one directly south of 1A
- one south of Hundred Lane/Great Moulton 19, west of the BESS Site.
- Hundred Lane / Great Moulton 19 crosses its centre, and Tivetshall St Margaret FP1/FP2 run north-south.

4.5 Proposed Solar Panels

The solar panels are part of the cumulative visual, hydrological and access effect even if their direct construction differs from substations.

OPTION A: SINGLE-AXIS TRACKER PANELS

If single-axis tracker panels are retained as an option, the assessment should address maximum height, movement, glint / glare, mechanical noise, maintenance and visual appearance during tilted positions.

- Solar PV array area. Chapter 5 states maximum solar PV arrays were considered at Stage 1, then reduced along the southern boundary to increase the Hundred Lane buffer, respond to PRow views and provide landscape/ecological mitigation.
- Arrays were also reduced to accommodate hedgerows, trees, field margins and a pond in the northwest corner.
- 4.5m above ground level at greatest inclination
- 2.5m when horizontal
- 0.4m minimum clearance above ground

4.6 Site 1C & 1D

The Applicant's documents appear to identify Sub-Sites 1C and 1D principally in connection with the grid connection, including overhead-line works, potential pylon relocation, underground and/or overhead cabling, construction access and mitigation or enhancement of land. However, the precise purpose and extent of development within each parcel remains unclear.

This is significant because the National Grid Substation and 400kV Project Substation are proposed within Sub-Site 1B, while associated grid-connection works, including cables, overhead lines and potentially new or relocated pylons between the substations and the Point of Connection, may extend across Sub-Sites 1A–1D. **Sub-Sites 1C and 1D must therefore be assessed as integral parts of the same grid-infrastructure package, rather than as minor or residual land.**

The Applicant should clearly identify, for each of Sub-Sites 1C and 1D:

- the exact works proposed and their maximum extent;
- whether pylons, overhead lines, underground cables, access routes or construction compounds would be located within the parcel;
- which works and land-use changes would be temporary and which would remain permanently or be subject to retained rights;
- the construction period, access arrangements and likely disturbance;
- why each parcel is necessary and what reasonable alternatives were considered; and

- the residual and cumulative effects when considered alongside Sub-Site 1B, the National Grid Substation, the 400kV Project Substation, the BESS and associated connection infrastructure.

Without that information, the effects on landscape and visual amenity, residential outlook, PRoW, agricultural land, drainage and private water supplies, ecology, construction traffic, lighting and cumulative infrastructure cannot be properly understood or tested.

Great Moulton residents therefore submit that the present information for Sub-Sites 1C and 1D is insufficiently clear and parcel-specific. If these parcels are required for pylon relocation, overhead-line reconfiguration, cabling, access, construction works, mitigation or retained grid rights, those works and their consequences must be expressly identified, assessed and justified.

Before reliance is placed on the Applicant's conclusions, the Examining Authority should require a clear parcel-by-parcel explanation of **what is proposed in 1C and 1D, why the land is required, how long each use will last, what alternatives were considered, and how the individual and cumulative environmental effects have been assessed and secured.**

4.7 Noise Intrusion into rural Rural Character, Cumulative Effects and Assessment Uncertainty

Great Moulton and Tivetshall residents have employed their own Consultant - his comments are included under each relevant chapter. BEPS-GMPC -Review of the NIA - East Pye Solar V2.pdf - Oakridge Environmental Services) - (see full report following & Appended to this document

Great Moulton is a quiet rural environment, not an existing industrial soundscape. The significance of operational noise therefore cannot be judged simply by whether a predicted figure falls below a general numerical limit. The important questions are how noticeable the new sound would be, its character, how long it would occur, and the extent to which it would change the existing rural acoustic environment, particularly during evening, night-time and early-morning periods.

The Applicant has undertaken a substantial baseline survey, these were unattended acknowledges that it was not possible to identify the dominant sound sources throughout the monitoring periods. At the Great Moulton monitoring locations, (these have never been identified), so the road traffic may in fact refer to the B1134, which is not in the vicinity of Great Moulton, the road traffic was identified during attended observations, but the technical review questions whether traffic provides a reliable and continuous masking effect at the nearest homes, particularly during quiet night-time periods. **East Pye also identifies the relevant Great Moulton residential receptors as high-sensitivity receptors.**

Page 5 2.1 Baseline Sound Survey The Environmental Statement on noise and vibration prepared by Stantec provides a baseline noise survey taking data from 51 noise monitoring positions that effectively ...(see full report following & Appended to this document

Page 6 The submitted ES Chapter 12 identifies MP41, MP42 and MP43 as the associated measurement positions for residential receptors in and around Great Moulton, including dwellings on Broadgate Lane and Station Road. The ES also identifies these (see full report following & Appended to this document

This is important because the proposed development would introduce a substantial new cluster of electrical infrastructure into that rural setting, including the **BESS, National Grid Substation, Project Substation, transformers, inverters and associated electrical plant**. These are operational effects capable of occurring over the lifetime of the development, including during the quietest periods of the night.

We would ask the ExA to be aware of Great Moulton's concern that the omission by the Applicant not to identify that the POC substation has no decommissioning date, so the proposed temporary changes to the environment are NOT temporary.

The concern is increased because the operational noise assessment is **not based on final plant specifications or a final equipment layout**. East Pye states that detailed plant specifications are not yet available and that potential noise emissions have therefore been assessed using **example equipment data and an example plant layout**. The final number, type, location and operating regime of BESS containers, transformers, inverters and cooling equipment may materially affect both the overall noise level and its acoustic character.

Page 8 2.2 Noise modelling and calculations 2.2.1 Assessment Assumptions and Limitations The authors have stated that "Detailed plant specifications are not available at this stage and potential noise emissions based on example equipment data have been assessed using an example plant layout which has been based on an indicative plant layout) (see full report following & Appended to this document

There is also significant reliance on mitigation. The assessment includes a **4-metre-high acoustic barrier around parts of the BESS**, while reduced fan duty is assumed as part of the BESS noise mitigation. The technical review identifies uncertainty over matters including the number of BESS units represented in the model, barrier location and performance, source heights, frequency response, plant layout and the effectiveness of the mitigation over the lifetime of the development.

BEPS-GMPC -Review of the NIA - East Pye Solar V2.pdf

Page 9 This introduces a level of uncertainty that is difficult to evaluate. The authors have prudently used a conservative approach assuming the plant operates simultaneously, continuously, and at maximum output. However, there is no indication as to the number of battery storage units (see full report following & Appended to this document

Particular concern arises from **tonal and low-frequency noise**. Electrical infrastructure does not necessarily produce sound that is adequately described by a single broadband A-weighted figure. The review identifies insufficient disclosed frequency data to independently verify the modelling of low-frequency sound from the BESS, inverters and substations, or the effectiveness of barriers at those frequencies. Such components may be more noticeable during quiet night-time conditions.

BEPS-GMPC -Review of the NIA - East Pye Solar V2.pdf

Page 9 The sound source data have only been given in broadband A-weighted sound power levels and thus, if the noise model has been calculated in accordance with ISO 9613-2, has used the 500 Hz octave-band frequency to estimate ...

BEPS-GMPC -Review of the NIA - East Pye Solar V2.pdf

Page 10 ... frequency propagation, barrier performance at low frequencies or the potential prominence of transformer hum and cooling plant noise at night. This is particularly relevant as the development includes both BESS infrastructure, ...(see full report following & Appended to this document

East Pye itself recognises that high-voltage transformers can generate a **100 Hz hum**, but concludes that this would be masked by broadband noise from the BESS inverters and containers. The technical review questions whether that assumption has been sufficiently demonstrated. If a BESS cooling plant operates at reduced duty during the night, or plant loading and operating conditions change, the relative prominence of transformer noise may also change. Without the underlying one-third-octave data, the absence of an appropriate BS 4142 acoustic-feature correction cannot presently be independently verified.

BEPS-GMPC -Review of the NIA - East Pye Solar V2.pdf

Page 11 2.2.3 BS 4142 Acoustic Feature Rating Corrections The authors have concluded that neither the BESS nor the National Grid Substation produce any tonal sound, despite stating:.... “.(see full report following & Appended to this document)

This is therefore **not an argument that unacceptable noise has already been conclusively demonstrated**. The concern is that the Applicant has not yet provided sufficient certainty to rule it out. The review identifies continuing uncertainty over final plant specification, source spectra,

modelling assumptions, mitigation performance and whether the measured residual sound environment is representative of the most affected homes.

The issue must also be considered **cumulatively**. Residents around Site 1 and the adjoining BESS would not experience the National Grid Substation, Project Substation, BESS, inverters and other electrical plants as separate planning exercises. They would experience the combined acoustic effect of an infrastructure cluster operating within the same rural environment. Any assessment and noise limits must therefore control the **combined operational effect**, rather than allowing individual items of plant to be considered in isolation.

For Site 2 and other solar parcels containing operational electrical equipment, the same principle applies: the assessment must demonstrate that inverter, transformer or other plant noise remains acceptable at the relevant receptors. However, the attached technical review is principally directed to the BESS and National Grid infrastructure around Great Moulton and should not be presented as a parcel-specific assessment of Site 2.

What should be required

Before reliance is placed on the Applicant's conclusion of no significant operational noise effects, East Pye should be required to demonstrate, on a secured worst-case basis:

- the final or maximum plant numbers, specifications, locations and operating conditions;
- cumulative operational noise from the BESS, National Grid Substation, Project Substation, transformers, inverters and associated plant;
- representative night-time background conditions at the most affected homes;
- appropriate assessment of **tonality, low-frequency sound and other distinctive acoustic characteristics**;
- the specification and effectiveness of acoustic barriers, enclosures and other mitigation;
- enforceable cumulative noise limits applying to the completed development; and
- post-installation verification, together with a clear requirement for corrective mitigation if operational noise proves more intrusive than predicted.

The central concern is that a long-term industrial acoustic character should not be introduced into a quiet rural environment on the basis of example equipment, indicative layouts, assumed masking and mitigation that has not yet been finally specified and demonstrated.

The Applicant must therefore establish not merely that predicted broadband noise can meet numerical criteria, but that the **final development, operating cumulatively and during the quietest periods, will avoid significant adverse effects and minimise other adverse effects on residential amenity and quality of life**. The technical review concludes that the present information does not yet provide sufficient certainty to make that judgment.

However, it is not possible to validate this assessment due to the degree of uncertainty in the submitted assessment. This is due to: • The lack of detail in plant selection, both for the BESS and National Grid ...(see full report following & APPENDIX 2)

4.7.1 Noise Impact Assessment Review

Undertaken by Oakridge Environmental Services on behalf of the village of Great Moulton

APPENDIX 2 Based on the Review undertaken by Oakridge Environmental Services

4.7.2 Noise Impact Assessment Review

Article, regarding the issue of Noise associated with large NSIP developments. Daniel Clare is managing director at RSK Acoustics – 2 April 2025

APPENDIX 3

4.8 Information Required from East Pye Regarding Deferred Design, Noise and Access Details

Due to the complexity of the scheme, and the extent to which East Pye relies on maximum design parameters, outline assumptions and later detailed design, with detailed access layouts deferred, concerned residents ask the ExA to ensure that East Pye provide the following information:

1. Provide a full operational noise assessment for Site 1, Site 2B, the BESS, the National Grid Substation and the 400kV Project Substations, based on the final or current assumed equipment layout, equipment specifications, transformer locations, inverter and cooling plant locations, BESS container positions, acoustic enclosures, tonal characteristics, low-frequency noise, night-time operation and cumulative plant noise. This should explain how operational noise would affect an extremely quiet rural soundscape where background sound levels may fall below 25 dB, and should include clear, enforceable limits, post-installation monitoring and corrective-action requirements if noise proves audible, tonal or intrusive at residential receptors, gardens, public rights of way or other quiet rural receptors.
2. Provide a single parcel-by-parcel infrastructure schedule for Sub-Sites 1A, 1B, 1C, 1D and the BESS Site, identifying every permanent and temporary component by Work Number, maximum dimensions, likely location and whether it is temporary or permanent.
3. Confirm whether any solar PV arrays are proposed in Sub-Sites 1C and/or 1D, or whether those parcels are limited to overhead line, pylon, cabling, mitigation, access or ancillary works.

4. Provide the final or current assumed number and location of CCTV cameras for Site 1A–1D, the Project Substations and the National Grid Substation, including pole heights and whether infrared lighting is proposed.
5. Provide a lighting plan showing operational lighting columns, emergency lighting, motion-sensor zones, switching arrangements and bat/ecology buffers for the BESS, National Grid Substation and 400kV Project Substations.
6. Provide a combined plan showing the National Grid Substation, 400kV Project Substations in Sub-Site 1B, pylon works, cable trenches, drainage infrastructure, access roads, palisade fencing and deer fencing.
7. Provide a construction-phase plan for Site 1A–1D showing construction compounds, laydown areas, temporary fencing, haul routes, welfare/office areas, lighting locations, vegetation removals and visibility-splay works.
8. Provide a clear drainage and firewater-containment note explaining how firewater from Site 1A–1D, the BESS, the National Grid Substation and the 400kV Project Substations would be contained, tested and removed, and how failures of penstock, shut-off or containment systems would be prevented.
9. Demonstrate how these infrastructure elements have been assessed together for residential amenity, public rights of way, landscape, dark skies, tranquillity, ecology, traffic, drainage, agricultural land and cumulative effects, rather than considered only as separate topic elements.

Visual Image to try and show proximity of site 1B to Great Moulton, site boundaries of peoples homes (c.25m) & PRoW



Chapter 5: Reasonable Alternatives and Design Evolution

5.1 National Policy on Site Selection and the Point of Connection

The 2025 EN-1, EN-3 and EN-5 policy suite came into force on 6 January 2026. EN-5 recognises the urgent need for electricity network infrastructure, but still requires The Applicant to justify the siting, design and mitigation of associated infrastructure such as substations.

National Policy EN-5 2.2.5-2.2.9 states The identification of a grid connection does not remove the Applicant's responsibility to justify the particular land selected for the associated electricity infrastructure.

The Applicant should transparently compare each reasonable alternative against topography, existing screening, community, environmental constraints, land use, BMV land quality, access, safety and alternatives.

The 400kV transmission network constrained the general area in which East Pye could connect, but it did not dictate that the National Grid Substation had to be located specifically within Sub-Site 1B. East Pye considered more than one possible substation location before selecting Option 4B (subsite 1B).

The selection of Sub-Site 1B was therefore a separate decision which the Applicant must justify on the grounds within the National Policy. The policy question is not merely whether the effects of Site 1B can be mitigated, but whether another site could have avoided or reduced them.

EN-5 recognises that the initiating and terminating points of network infrastructure may be constrained, but paragraphs 2.2.5–2.2.9 also make clear that applicants retain control over routing and site selection within the development zone, are not exempt from balancing site-selection considerations, and should carefully consider the location and design of substations, including local topography and opportunities for screening. The question is therefore not whether a grid connection constrained the broad search area, but how the Applicant selected the particular land within that area.”

In ExQ1 Q1.3.1 the ExA asks why the Scheme remains a reasonably practicable and robust solution following the transition to the Great Moulton point of connection and what evidence shows that a fresh site-selection exercise centred on Great Moulton would not have produced a materially different scheme. Q1.3.2 separately asks the Applicant to explain the relative influence of environmental assessment, engineering requirements, grid connection considerations, landowner willingness and land availability. Chapter 5 addresses those two questions.”

The Applicant should therefore show how the topographical and screening of Options 1, 2, 3, 4A & 4B were compared before selecting Option 4B (subsite 1B) was selected.

East Pye EIA scoping describes Site 1 topography as predominantly level,

We would submit this is not an accurate description as described by Broadland District Council, South Norfolk - South Norfolk landscape character assessments describes it as follows:

E2: GREAT MOULTON PLATEAU FARMLAND DESCRIPTION 17.1. Location and Boundaries:

The Great Moulton Plateau Farmland character area comprises an area of elevated plateau above the 50m contour in the southern part of South Norfolk District. To the north, south and west lower lying Tributary Farmland slopes away from the plateau towards the rivers of the Tas and Waveney. Its western edge is formed by the boundary of South Norfolk District, although the plateau character extends into Breckland District.

E2: GREAT MOULTON PLATEAU FARMLAND DESCRIPTION 17.1. Location and Boundaries: The Great Moulton Plateau Farmland character area comprises an area of elevated plateau above the 50m contour in the southern part of South Norfolk District. To the north, south and west lower lying Tributary Farmland slopes away from the plateau towards the rivers of the Tas and Waveney. Its western edge is formed by the boundary of South Norfolk District, although the plateau character extends into Breckland District.

The simplicity of the Plateau Farmland landform is a reflection of the uniformity of the underlying geology comprising a thick layer of chalky glacial till (Lowestoft Till). Landform, Topography. The flatness of the plateau landform and lack of enclosure affords a strong sense of openness with expansive skies and distant views, both internally within the plateau and across the adjacent landscapes from the plateau edge. Land Cover and Biodiversity This is a simple and uniform landscape, dominated by arable farmland with largescale, regular, geometric fields. There has

been wide-scale removal of boundary vegetation to accommodate modern farm machinery and the scarcity of hedgerows accentuates the scale and openness of the plateau. Where hedgerows do occur as field boundaries they tend to be fragmented

<https://www.southnorfolkandbroadland.gov.uk/planning/future-development/supplementary-planning-documents/south-norfolk-landscape-character-assessments>

Did East Pye demonstrate why Site 1B was the appropriate location for the grid infrastructure after environmental, community, agricultural, access and technical considerations were compared with reasonable alternatives?

5.2 National Grid Substation Alternatives - Options 1,2,3,4A &4B

The chronology matters because the Scheme was not selected in its present form at one point in time. The Applicant's Site Selection Assessment records that the earlier solar-site search was undertaken while Norwich Main was being considered and that Sites 1 and 2 were subsequently added after the Point of Connection was identified south of Great Moulton. The National Grid Substation search also evolved: the initial alternatives were followed by a Great Moulton option south of the village and a further alternative within Sub-Site 1B. By EIA Scoping both Great Moulton locations were still under consideration.

The Examination therefore needs to be able to follow not only the final reasons given for Site 1B, but the evidence available when each successive decision was made.

APP/7.20 states that Options 4A and 4B were subjected to the **“same RAG rating”** using the identified site-selection criteria. However, BEPS has been unable to identify sufficient evidence to establish whether the later options were subjected, at the relevant decision-making stage, to the **same depth of option-specific scrutiny and supporting technical investigation** as Options 1–3.

For example, APP/7.20 expressly refers to swept-path analysis in the consideration of Options 1 and 3 and provides detailed reasoning concerning highway constraints. The assessment of Option 4 and subsequently Options 4A/4B is described principally as a desk-based review. It is therefore unclear whether equivalent highway, abnormal-load, landscape, heritage, flood-risk, ecology, PRow and other technical work had been undertaken for 4A/4B at the point at which those options were compared and the preferred location selected.

BEPS therefore respectfully requests that the Applicant be asked to provide the **contemporaneous audit trail** for the National Grid Substation site-selection exercise, including:

- The date on which each of Options 1, 2, 3, 4A and 4B was first identified, assessed, refined and rejected or selected; the option-appraisal matrices, RAG worksheets and decision records which existed at those respective dates; the technical studies and

specialist advice relied upon for each option; clarification of whether the assessment now presented in Tables 3.1 and 3.2 of APP/7.20 was prepared contemporaneously with the decisions or subsequently consolidated for the DCO application; and an explanation of how comparability between the earlier and later options was maintained where the evidence available at the respective assessment stages differed.

- BEPS also asks the Applicant to identify any option-specific swept-path or abnormal-indivisible-load assessment undertaken for Options 4A and 4B, or, if none was undertaken before the preferred location was selected, to explain why that level of highway assessment was considered necessary for some of the earlier options but not for the later alternatives.
- It would additionally assist if the Applicant provided a **single side-by-side comparison of Options 1, 2, 3, 4A and 4B against a common set of criteria**, identifying the evidence available at the date each decision was made rather than relying solely upon the later summary contained in APP/7.20.
- Finally, BEPS asks for confirmation of the relationship between Options 4A/4B in APP/7.20 and the locations subsequently described during consultation as the National Grid Substation “Option 1” and “Option 2”, so that the complete site-selection chronology can be followed without ambiguity.

BEPS is not asserting that the later options were necessarily inadequately assessed. The concern is that the submitted evidence does not presently allow Interested Parties, or potentially the Examining Authority, to verify whether the alternatives considered at different stages were subjected to a **consistent and reasonably comparable level of scrutiny before the preferred Great Moulton location was selected**.

The submitted material shows a process driven heavily by grid availability, proximity to the Bramford to Norwich 400kV overhead line, access, landowner willingness, commercial deliverability and the need to accommodate a very large 500MW export/import scheme. This may explain why East Pye prefers the chosen land. East Pye have not proven that the Great Moulton and Tivetshall locations are environmentally, socially or agriculturally acceptable, or that less harmful alternatives were properly examined.

APP/7.20 and APP/6.3.2.1 establish the change from the earlier Norwich Main strategy to Great Moulton, the addition of Sites 1 and 2, and the existence of alternative National Grid Substation locations at scoping.

Reconstructed comparison: Compiled by BEPS - Great Moulton Options 1–3 against Site 4A or 4B??

We would submit that Option 4A or (B), would have varying results based on which site was evaluated

	Applicants Recorded Position			Applicants Recorded Position	Applicants Recorded Position	Outstanding BEPS Question/Source
Issue	Option 1 – Newton Flotman	Option 2 – Tharston/Tasburgh	Option 3 – Long Stratton	Option 4A (formerly option 4)	Option 4B	
Date First Evidenced/Assessment Stage	Oct/Nov 2024	Oct/Nov 2024	Oct/Nov 2024	Late 2024/ before 15 Jan 2025	?	Date for Option 4B
Proximity to 400kV line	Suitable; identified because near Bramford–Norwich line	Suitable; near line	Suitable; near line	Where is evidence demonstrating the same appraisal methodology? Very favourable : beneath/adjacent to Bramford–Norwich line	Where is evidence demonstrating the same appraisal methodology? Very favourable : beneath/adjacent to Bramford–Norwich line	Willing Land Owner identified

	Applicants Recorded Position			Applicants Recorded Position	Applicants Recorded Position	Outstanding BEPS Question/Source
Road access	A140/Flordon Road; narrow through Newton Flotman, parking, overhead wires, HGV pinch points	A140/Bungay Road/Long Lane; narrow country lanes; difficult for articulated HGVs	A140/Swan Lane; feasible but speed bumps, tight bends and settlement route	Where is evidence demonstrating the same appraisal methodology?		No Road Access Evaluations for 4A or 4B
Residential receptors	Homes along Flordon Road; new dwellings ~400m north	Closest dwelling ~150m east; others ~325m north	Hunts Mead immediately west; route through Long Stratton	Where is evidence demonstrating the same appraisal methodology?	Where is evidence demonstrating the same appraisal methodology? Great Moulton ~120m East;	
Heritage	Strong constraint: Rainthorpe Hall Grade II RPG, Grade I Rainthorpe Hall, Grade II Hall Farmhouse	Listed buildings around The Street	Beresford Grade II ~100m west; Forngett Conservation Area ~980m	Where is evidence demonstrating the same appraisal methodology? Where is evidence demonstrating the same appraisal methodology?		Moulton Farmhouse Grade II ~85m south of Sub-Site 1B, Wacton Hall Grade II* ~980m NE
Ecology / designated sites	No statutory ecology in site; nearest SSSI/SAC ~1.3km	No statutory ecology in site; nearest ~1.4km	No statutory ecology in site; nearest SSSI ~875m	Where is evidence demonstrating the same appraisal methodology? No statutory ecology in site; nearest SSSI ~2.4km	Where is evidence demonstrating the same appraisal methodology?	

	Applicants Recorded Position			Applicants Recorded Position	Applicants Recorded Position	Outstanding BEPS Question/Source
Landscape screening	Sparse hedges/trees; some woodland	Hedgerows/tree screening including Long Lane	Strong hedgerow on western boundary, woodland strip south	Where is evidence demonstrating the same appraisal methodology?		BEPS-Great Moulton - disputes this assertion.
Flood risk	Outside FZ2/3	Outside FZ2/3	Outside FZ2/3	Where is evidence demonstrating the same appraisal methodology? Flood Zone 1 -	Where is evidence demonstrating the same appraisal methodology?	?
PRoW	Not a major stated reason for dismissal	Not principal reason	Not principal reason	Where is evidence demonstrating the same appraisal methodology? PRoW crosses, but East Pye says it avoids the substation footprint	Where is evidence demonstrating the same appraisal methodology?	2 PRoW - running along two boundaries of proposed site
Agricultural land	Provisional Grade 3	Provisional Grade 3	Provisional Grade 3	Where is evidence demonstrating the same appraisal methodology? Provisional Grade 3 at selection stage;	Where is evidence demonstrating the same appraisal methodology?	identified Grade 2 BMV

	Applicants Recorded Position			Applicants Recorded Position	Applicants Recorded Position	Outstanding BEPS Question/Source
Main reason dismissed	Access + residential routing + heritage	Highway constraints + third-party land	Residential/sensitive receptors + route through settlement	Where is evidence demonstrating the same appraisal methodology? SELECTED APP/7.20 §6.1.3 says: “The Applicant identified suitable land, with willing landowners + discussions with NGET	Where is evidence demonstrating the same appraisal methodology?	

Conclusion

BEPS does not suggest that no assessment was undertaken. Our concern is that **East Pye has not provided a clear and transparent like-for-like comparison of National Grid Substation Options 1, 2, 3, 4A and 4B from which the Examination can readily understand why Site 1B ultimately emerged as the preferred location.**

The wider alternatives assessment itself indicates that Site 1B was not the only technically feasible location. For example, the Applicant records that parts of Siting Zone 3 “**could represent a feasible area to construct a National Grid Substation**”, but that those areas were not progressed because a location closer to the solar sites was preferred. Likewise, factors such as shortening connections or diversions may reduce construction impacts and capital costs. These are legitimate considerations, but they are not the same as demonstrating that Site 1B was environmentally preferable when all effects are considered together.

The evidence therefore suggests that the selection of Site 1B reflected a combination of considerations, including **proximity to the existing 400kV line, access, proximity to the Applicant's solar sites, engineering and connection efficiency, competing development constraints and land availability**. The issue for BEPS is whether those considerations were applied consistently across all of the Land Parcels

5.3 Design Evolution - Site 1 B

Norwich Main chronology, NGET capacity advice, the requirement for a new substation, the Bramford to Norwich 400kV overhead line and the 500MW export/import connection offer.

Norwich Main was discounted on NGET capacity advice and East Pye was advised to look for a new site on the Bramford/Norwich Line. Three options were originally reviewed during October/November 2024, Option 1 – Newton Flotman, Option 2 – Tharston/Tasburgh, Option 3 – Long Stratton. In Late 2024 but prior to 15 January 2025 Option 4A (formerly option 4) - Great Moulton was included. In January 2025 a further option was added, namely Option 4B - Great Moulton APP/7.20 paragraphs 3.2.3-3.2.9:

The January 2025 Scoping material treats Site 1 as one of the locations for solar PV arrays, separately identifying the BESS and National Grid Substation. Current ES/LVIA material records solar arrays, National Grid Substation, 400kV Project Substation and grid connection works within/around Site 1

APP/7.20 records Sites 1 and 2 being added under the **Applicant's assessment of suitable solar development sites**. The Applicants documents show an evolution from Site 1 being introduced as solar-generating land to Site 1B subsequently becoming the principal location of a substantial electrical infrastructure

East Pye's documentation shows the commercial and technical pathway by which it arrived at the present scheme.

The ExA must establish whether land availability narrowed the pool before environmental comparisons were sufficiently complete

Source note: APP/7.20 sections 4.6 and 4.7, and the solar site assessment material, show that land availability and willingness to participate were material to the filtering of potential development areas and alternative development zones.

5.4 Parcel-specific justification for Sub-Sites 1A–1D

The Applicant's documents clearly identify Site 1 as comprising four separate sub-sites, 1A, 1B, 1C and 1D [APP/6.1.3; APP/6.3.7.2]. They are therefore not unexplained parcels of land, and each has an identified function within the Scheme.

Sub-Site 1A accommodates solar PV arrays and associated infrastructure. Sub-Site 1B accommodates solar PV arrays together with the principal grid infrastructure, including the National Grid Substation and 400kV Project Substation. Sub-Sites 1C and 1D have a particular role in accommodating the Grid Connection Infrastructure and Overhead Line Works associated with connecting the Scheme to the existing 400kV network. APP/6.3.7.4 expressly explains that 1C and 1D are included to represent the Overhead Line Works, while APP/6.3.7.7 identifies Grid

Connection Infrastructure within Sub-Site 1C and assesses views in which the BESS, Site 1B and National Grid Substation would be experienced together.

There is also evidence of design evolution and mitigation within Site 1. For example, the Applicant identifies changes affecting Sub-Site 1A arising from access, PRow, landscape and planting considerations, and the visual assessment records solar arrays within 1A and 1B together with associated mitigation. The National Grid Substation within 1B was also reorientated and its relationship with the Project Substation changed during design development.

The issue for BEPS is therefore not whether Sites 1A–1D have a stated purpose, but whether the Applicant has provided a sufficiently clear parcel-specific justification for why each was originally selected and subsequently retained. Design evolution demonstrates how impacts have been mitigated after the land entered the Scheme, but it does not necessarily explain why that particular parcel was preferable to reasonable alternatives.

For each of Sites 1A–1D, the Examination should therefore be able to identify clearly: its purpose within the Scheme, the reasonable alternatives considered, the reasons for its selection and retention, the design changes subsequently made, and the residual environmental and community effects. This would enable the ExA to have confidence that the overall selection and continued use of Site 1 has been robustly justified.

Source note: The reviewed APP/6.1.5 / APP/7.20 material provides more detail for 1B and some design-evolution material for 1A, but much less parcel-specific explanation for 1C and no clear equivalent design-evolution entry for 1D in the material reviewed.

5.5 The BESS Site Selection & Risk Specific Alternatives

APP/7.20 states that the BESS Site was selected principally because of its proximity to the Point of Connection and access from Station Road, with landscape, visual, heritage and noise effects also considered. It also identifies operational advantages from locating the BESS close to the National Grid Substation. Those are relevant considerations.

East Pye also identifies distances to residential property, a listed building and PRow, a site may be convenient for electrical efficiency and still be inappropriate when judged against residential proximity, fire safety, rural road capacity, private water supplies, emergency response and cumulative infrastructure impacts.

The alternatives question is nevertheless wider. A BESS brings a different risk and operational profile from solar arrays. A site may be convenient for electrical efficiency and still be inappropriate the site-selection record should therefore show how residential separation, emergency access, fire and thermal-event response, firefighting and contaminated runoff, groundwater and private water supplies, noise, lighting, landscape, ecology and cumulative interaction with the substations were considered when the BESS location was selected and

retained. The remaining question is whether the BESS's distinct safety, drainage, emergency-access, noise, lighting and residential considerations were given sufficient weight when the location was selected and retained, rather than being addressed principally through later mitigation

BEPS is not suggesting that the BESS must be remote from the Point of Connection. The request is for a transparent record showing how network efficiency was balanced against the site-specific environmental and safety consequences of concentrating the BESS next to the principal grid hub.

5.6 Design Evolution – Mitigation After Selection versus Avoidance Through Selection

The Applicant's site-selection material refers to willing landowners, voluntary agreements and the availability of land as relevant considerations. BEPS does not object in principle to those factors forming part of a site-selection exercise. The question is whether they were balanced alongside a sufficiently broad and comparative consideration of the environmental, planning and technical effects of the reasonable alternatives.

This distinction is important when considering subsequent design evolution. Mitigation can reduce an effect after a location has been selected, but successful mitigation does not, by itself, demonstrate why that location was preferable to another reasonable location where the effect might have been avoided or reduced at the outset.

Site 1 and Sub-Site 1B contain a substantial concentration of infrastructure and are subject to a number of identified constraints, including landscape and visual effects, nearby residential receptors, public rights of way, rural highway access, ecological and heritage considerations, Grade 2 Best and Most Versatile agricultural land, water-environment considerations and interaction with the BESS and associated grid infrastructure. The Applicant's documents show that the design has evolved in response to constraints, including changes to infrastructure locations, setbacks, access arrangements and environmental mitigation. Those changes are relevant and should be recognised. However, they also raise a separate site-selection question: **were the constraints that required those changes sufficiently considered when the reasonable alternatives were compared and when the Site 1/Site 1B configuration was subsequently retained?**

The relevant distinction is therefore between **mitigating effects within the selected site** and **avoiding or reducing effects through the choice of site itself**. The Applicant should demonstrate not merely that individual effects can be mitigated, but that the environmental

consequences identified through design evolution were taken into account when deciding whether the selected location remained justified when compared with reasonable alternatives.

Detailed consideration of the individual effects is addressed in the relevant BEPS topic chapters. The Chapter 5 issue is whether those identified constraints and effects are fed back into the alternatives and site-selection process.

“Mitigation can reduce an effect after a location has been selected, but successful mitigation does not, by itself, demonstrate why that location was preferable to another reasonable location where the effect might have been avoided or reduced at the outset.” Do these changes demonstrate successful design evolution, or do they also show that significant constraints existed in the selected land which should have been considered when alternatives were compared?

5.7 Later BMV Evidence and Reconsideration of Site Selection

The discovery of higher-quality land than assumed at early stages should trigger a clear explanation of whether and how the alternatives appraisal was revisited. If not revisited, the Applicant should justify that position.

The Applicants documents show that early provisional ALC mapping suggested mostly undifferentiated Grade 3 land, but the later detailed ALC survey found the land quality was generally higher than expected, including substantial Grade 2 and Grade 3a Best and Most Versatile land. A subsequent detailed ALC survey confirmed much of the land was BMV.

This is especially important for Site 1. East Pye states that all of Site 1 north of Hundred Lane is Grade 2 land. It also accepts that the National Grid Substation would be located on Grade 2 land, that project substation infrastructure would be on Grade 2 land, and that the BESS would also be located on Grade 2 land. The National Grid Substation would cause permanent loss of Grade 2 land, and East Pye accepts that if deep piling is required for the BESS, restoration to comparable ALC grade is unlikely to be achievable.

That is not a minor issue. BMV Grade 2 land forms part of the nationally important Best and Most Versatile resource. The later ALC evidence raises a clear question as to whether and how the earlier selection was reconsidered. The current case appears to be that Grade 2 land cannot be avoided because of the chosen grid connection location. That is circular reasoning. East Pye relies on the chosen location to justify the harm, rather than proving that the chosen location remains justified despite the harm.

5.8 Private Water Supplies

East Pye has undertaken assessment of private water supplies and existing lawful water users in the Ground Conditions Assessment and Water Resources Assessment. The Chapter 5 issue is therefore not the absence of any PWS assessment. It is whether the receptor-specific information obtained through those later assessments was capable of affecting the selection or retention of Site 1/BESS and, if so, whether that feedback into the alternatives/design-evolution process is documented. The detailed source–pathway–receptor and mitigation issues are addressed in the Water Environment and Human Health chapters.”

The Examining Authority should require East Pye to identify precisely what is proposed, how it interacts with private water supplies, and why this land is necessary. Without that information, the assessment remains incomplete.

Source note: APP/7.20 Site Selection Assessment; APP/7.5 Outline Battery Safety Management Plan; APP/6.1.18 Other Environmental Topics; relevant water, noise and transport assessments

5.9 Cumulative Site 1/BESS Infrastructure Cluster

When choosing between reasonable locations, the Applicant should consider the consequences of concentrating the principal infrastructure elements within the same Site 1/BESS cluster.

East Pye has undertaken topic-specific and cumulative assessments which identify a range of effects arising from the BESS, National Grid Substation, Project Substations, overhead-line works, cabling, access, lighting and associated infrastructure. The relevant question for site selection is whether the significance of those combined effects was taken into account when the Site 1/BESS location was selected and subsequently retained.

The issue is therefore not simply whether the effects of each individual component can be mitigated. It is whether, having regard to the combined environmental and community effects identified through the Applicant’s own assessments, the continued concentration of this infrastructure in this location was reconsidered and remains justified.

These effects are considered in more detail in the relevant BEPS topic chapters, including landscape and visual effects, noise, water environment, transport and access, human health and residential amenity.

5.10 National Grid Infrastructure and Delivery Uncertainty

The relationship between the promoted National Grid Substation and NGET’s final connection solution is now expressly before the Examination. ExQ1 Q1.2.15 asks NGET to clarify why its relevant representation states that the new connection agreement will not require the Applicant to secure land or consent for the National Grid Substation, whether significant additional NGET

infrastructure may be required, whether the substation might need to be located differently, and the expected delivery timescale. APP/7.11 also records different Connections Reform positions for the two components of the Scheme: the solar component has Gate 2 Phase 2 prioritisation, while the BESS has Gate 1 prioritisation and no confirmed indicative connection date. These matters do not of themselves determine the acceptability of Site 1B, but they are relevant to whether the land, infrastructure envelope and environmental assessment now promoted remain appropriately justified.”

Source note: NGET Relevant Representation/grid-connection material; Planning Act 2008, s.122.

5.11 Conclusion

BEPS does not contend that East Pye failed to undertake a site-selection exercise. The Applicant has provided the Site Selection Assessment [APP/7.20], the Environmental Statement chapter addressing reasonable alternatives and design evolution [APP/6.1.5], the Design Approach Document [APP/7.17] and associated environmental assessments and plans.

The issue is whether that evidence provides a clear and auditable explanation of why the Site 1/BESS configuration now before the Examination remains justified as a whole.

APP/7.20 records that the original solar land was identified while a connection at Norwich Main was being considered and that Sites 1 and 2 were subsequently added after the Point of Connection moved south of Great Moulton. It also records that the solar-site search focused upon larger landholdings identified through land agents and landowners willing to make land available.

The Applicant subsequently compared Options 4A and 4B for the National Grid Substation and selected Option 4B within Sub-Site 1B, The BESS was also located principally by reference to proximity to the Point of Connection and access from Station Road, alongside environmental considerations.

Those explanations are relevant, but the Examination should be able to understand how the individual decisions came together to produce the wider Site 1/BESS infrastructure cluster and whether later environmental, technical and grid information caused the Applicant to reconsider its earlier conclusions.

In particular, the outstanding matters can be grouped as follows:

- Site-selection chronology and comparison: how the move from Norwich Main to Great Moulton altered the site-selection exercise; what changed between Scoping, PEIR, targeted consultation and the DCO application; and whether reasonable alternatives were reconsidered as the Scheme evolved.

- Site 1 and the Sub-Sites: why Sites 1A–1D remain required in their present form and how changes to the National Grid Substation, Project Substations, cabling, overhead-line works, access and associated infrastructure affected that justification.
- BESS and the combined infrastructure cluster: why the BESS remains appropriately located alongside the substations and other grid infrastructure, and whether the significance of the identified BESS-specific and combined effects informed the selection and subsequent retention of that location.
- Later evidence and design evolution: whether later information, including the detailed identification of substantial Grade 2 and Grade 3a BMV agricultural land and other environmental constraints, caused the earlier site-selection conclusions to be revisited. Mitigation introduced after selection may reduce an effect, but does not by itself explain why the selected location remained preferable to another reasonable location.
- Grid connection and delivery: whether the National Grid Substation and connection solution are sufficiently defined for the Examination to understand the infrastructure actually required within Site 1B, and whether any material change in the connection arrangements could affect the layout, land take or environmental assessment.
- Land, rights and retained infrastructure: which land and rights are required for the Scheme now proposed, which infrastructure is temporary or permanent, and whether those requirements remain consistent with the final configuration and connection solution.

These matters closely reflect the issues already raised by the ExA in ExQ1 Q1.3.1 and Q1.3.2: whether the Scheme remains robust following the change to a Great Moulton-centred solution, and the relative influence of environmental assessment, engineering considerations, grid connection, landowner willingness and land availability upon the Scheme that ultimately emerged.

“BEPS therefore asks that the Examination obtain the evidence identified above before reaching conclusions on whether the Site 1/BESS configuration, the associated grid infrastructure and the related land and rights sought are adequately justified in the form proposed.”

Note: “The Botley West EN010147 Secretary of State request is useful because it demonstrates the importance of a clear audit trail where a solar NSIP has changed or evolved around grid-connection options. It is not relied upon as binding precedent, but it is a persuasive comparator. In Botley West, the Secretary of State requested additional information on alternatives and site selection, including grid-connection options,

search radius, environmental/social/economic considerations, technical and financial feasibility, BMV land, flood zones and grid infrastructure timing.”

Chapter 6 Site Selection Compliance/Audit Trail, Horlock Compliance and Grid Hub Design

BEPS does not suggest that East Pye failed to undertake a site-selection exercise. The Applicant has provided a Site Selection Assessment [APP/7.20], an Environmental Statement chapter dealing with alternatives and design evolution [APP/6.1.5], the Design Approach Document [APP/7.17] and a substantial range of environmental assessments.

Our concern is more specific.

The Examination needs to be able to follow a clear audit trail showing **how the National Grid Substation location developed, why Site 1B was ultimately selected, when land availability and landowner willingness entered that process, how environmental constraints were applied between competing locations, and whether the final grid-hub design reflects the Horlock Rules.**

This is particularly important because Site 1B is no longer simply part of a solar site. It has become the main grid-infrastructure hub for the western part of the Scheme, containing or directly associated with the National Grid Substation, the 400kV Project Substation, overhead-line and pylon works, cable connections, access infrastructure and the adjoining BESS and 4.5m high tracking solar panels.

The site-selection evidence should therefore be capable of explaining the choice of this location **as a combined infrastructure cluster**, rather than only explaining the location of individual components.

6.1 Audit Trail – Options 1 to 4A and 4B

The Applicant's documents show that the National Grid Substation site-selection process developed over time. The original options did not include the final Site 1B location in the form now proposed. A further Great Moulton option was subsequently identified and the process developed into Options 4A and 4B.

APP/7.20 records that due to another solar planning and the loss of site 4A, Option 4B within Sub-Site 1B was ultimately targeted. We submit that the site was simply the easiest choice, undertaken by a desktop analysis. We would suggest no site visits were made, BEPS-Great Moulton have requested a site visit but these were refused.

The Applicant then confirmed through the targeted consultation between 22 October and 26 November 2025 that Option 4B would be taken forward. There is nothing inherently wrong with a site-selection process evolving. Major projects frequently develop as technical information, land arrangements and environmental information become available.

The difficulty for residents and, we suggest, for the Examination is that the assessments of the different options were undertaken at different stages and are spread across several documents.

BEPS therefore considers that a clearer audit trail is required showing:

- when each National Grid Substation option was first identified;
- what environmental and technical information was available when each option was considered;
- what criteria were applied to Options 1, 2 and 3;
- whether the same criteria and level of scrutiny were subsequently applied to Options 4A and 4B;
- when Option 4A was introduced and when Option 4B was first identified;
- when NGET became involved in assessing the Great Moulton alternatives;
- when the decision was made to prefer Option 4B and relevant site visits undertaken;
- what role land availability and landowner willingness played at each stage; and
- whether any environmental assessment undertaken before the final Site 1B configuration remained appropriate after the design changed.

The purpose of this request is not to reopen the entire site-selection exercise. It is to allow the Examination to understand and test the reasoning that led to the particular grid-hub configuration now before it.

6.2 Land Availability and Willing Landowners

Land availability is plainly a relevant consideration for a project of this scale.

APP/7.20 expressly records that the Applicant identified suitable land with landowners willing to participate in the Scheme while discussions concerning the grid connection were taking place. It also explains that land agents were used to identify larger landholdings with potentially willing landowners. [APP/7.20, including paragraph 6.1.3 onwards]

BEPS does not object to that approach simply because willing landowners were involved. A scheme cannot realistically be developed without considering whether land can be secured.

The important question is how much influence land availability had on the alternatives that were actually examined.

There is a difference between:

- first identifying technically and environmentally reasonable alternatives and then considering their deliverability, and
- allowing the availability of particular land to determine the alternatives that receive detailed environmental consideration.

The Applicant's Policy Compliance Document itself recognises landowner willingness and commercial and technical feasibility as part of its approach to alternatives. [APP/7.15]

BEPS therefore asks for clarification rather than making an assumption about the process.

- The Applicant should explain whether potentially suitable locations were excluded because land was not voluntarily available and, if so, at what stage. Where this occurred, it should distinguish clearly between an option being rejected because it was environmentally or technically unsuitable and an option not being pursued because of land ownership or commercial deliverability.

That distinction matters because Site 1B itself contains significant constraints which have subsequently required assessment and mitigation:

- These include landscape and visual effects, nearby residential receptors, public rights of way, agricultural land, water and drainage issues, ecology, heritage, rural access and the cumulative effects of concentrating the National Grid Substation, Project Substation, BESS, cables, overhead-line works and associated development in this part of the Scheme.

The Examination should therefore be able to see that comparable constraints were considered consistently when the competing locations were assessed.

6.3 Horlock Rules and Site 1B

The Horlock Rules are particularly important to the National Grid Substation.

The current NPS EN-5 states that environmental considerations should be addressed from the earliest stage of substation development and that technical and capital-cost requirements should be balanced against environmental effects so as to keep adverse effects to a reasonably practicable minimum.

The principles include protecting local amenity, important habitats and landscape features, historic hedgerows and surface and groundwater sources; taking advantage of existing landform and screening; minimising visual, noise and other environmental effects; considering land-use effects; and considering the form of equipment, buildings and ancillary development appropriate to the individual location.

National Grid similarly describes its substation siting process as considering matters including proximity to transmission infrastructure, access, topography, distance from residential areas and environmental, cultural and visual constraints.

Those principles are directly relevant to Site 1B.

The location is within a rural landscape and the final proposal represents a substantial concentration of electrical infrastructure. Although planting, hedgerow reinforcement and other mitigation are proposed, the Horlock approach places considerable importance on the initial choice and design of the site itself, including use of landform, existing screening, layout and levels.

The issue is therefore not simply whether Option 4B performed better than Option 4A in relation to flood risk or the public right of way.

The wider question is:

Has the Applicant demonstrated that the siting and design of the complete Site 1B grid hub keeps the resulting environmental effects to a reasonably practicable minimum?

BEPS considers that this would be much easier for the Examination to determine if the Applicant and NGET provided a simple Horlock Compliance Schedule for Site 1B.

That schedule should identify each relevant Horlock principle and explain:

- how it influenced site selection;
- what alternatives were considered;
- what environmental constraints were identified;
- what design response followed;
- where effects could not be avoided;
- what mitigation is relied upon; and
- why the final location and design were considered preferable.

Particular attention should be given to the open rural setting, proximity to homes, landscape and visual effects, noise, public rights of way, agricultural land, groundwater/private water supplies, access requirements and the cumulative presence of the associated BESS and Project Substation.

This would provide a much clearer basis for assessing Horlock compliance than requiring the Examination to reconstruct the reasoning from numerous separate documents.

6.4 AIS, GIS and Lower Impact Substation Design

BEPS also considers that the Applicant should explain the technology and design alternatives considered for the 400kV infrastructure.

The present proposal appears to be based upon air-insulated switchgear (AIS). National Grid describes AIS as its standard arrangement for new substations, while GIS can be used in particular circumstances and has the advantage of being more compact, although generally more expensive.^B

BEPS does not suggest that GIS must automatically be used at Site 1B, or that GIS would necessarily have lower environmental effects in every respect.

The question is whether a more compact arrangement could materially reduce some of the particular effects experienced at this location.

The Infrastructure Planning (Environmental Impact Assessment) Regulations require the Environmental Statement to describe reasonable alternatives studied by the developer, which can include alternatives relating to design, technology, location, size and scale, together with the main reasons for choosing the preferred option.

EN-1 similarly requires information about reasonable alternatives actually studied by the Applicant, while recognising technical and commercial feasibility.

BEPS therefore asks the Applicant and NGET to explain:

- whether GIS was considered for any part of the National Grid or Project Substation infrastructure;
- whether hybrid AIS/GIS arrangements or other compact layouts were considered;
- whether those alternatives could reduce the overall footprint, height or spread of equipment, agricultural land take or visual exposure;
- what technical disadvantages or operational constraints would arise;
- the comparative implications for construction, maintenance, cost and future expansion; and
- why the configuration within the current Rochdale Envelope represents the appropriate design for this particular rural location.

If GIS or another compact design was considered and rejected, an explanation would resolve the issue..

If it was not considered, BEPS asks the Applicant to explain why it was not regarded as a reasonable design alternative for Site 1B.

6.5 Consistency in the Treatment of Constraints

A recurring concern throughout the site-selection evidence is whether constraints were applied consistently. APP/7.20 records reasons for discounting various locations including flood risk, access, public rights of way, environmental constraints, land availability and interaction with other development.

Many of those same types of constraint are also present to some degree around Site 1B.

That does not mean that Site 1B should necessarily have been rejected. It does mean that the Examination should be able to understand why a constraint regarded as important at one location was considered capable of mitigation at another.

BEPS therefore asks for a short comparative schedule showing the principal criteria applied to Options 1, 2, 3, 4A and 4B and the Applicant's assessment against each criterion.

This need not become another lengthy environmental report. A transparent table would be sufficient, provided that it identifies the supporting document and assessment date.

6.6 Information Requested from the Applicant and NGET

BEPS considers that much of the uncertainty could be resolved through one consolidated response rather than further information being scattered across separate submissions.

We ask the Examining Authority to consider requesting a Site 1B Grid Hub Site-Selection and Design Audit Statement, prepared by the Applicant with input from NGET where appropriate.

It should contain:

1. A dated chronology of Options 1, 2, 3, 4A and 4B, including when each was identified, assessed and discounted or selected.
2. A common comparison table showing the environmental, technical, access, land, residential and planning criteria applied to each option.
3. A land-availability statement explaining when willing-landowner considerations entered the process and whether any otherwise reasonable alternatives were excluded because land was unavailable.
4. A record of NGET involvement, explaining what assessment NGET undertook or reviewed in relation to the Great Moulton options and when.
5. A Horlock Compliance Schedule for the final Site 1B location and design.
6. An AIS/GIS and design-options statement explaining whether more compact technology or layouts were considered and why the proposed arrangement was selected.

7. Confirmation of the current grid-hub configuration, including the National Grid Substation, Project Substation, BESS relationship, overhead-line/pylon works, cable connections, access and any infrastructure intended to remain permanently.
8. Confirmation that the environmental baseline remains applicable to the final configuration. If material elements of the layout, access arrangements, cable routes, substation design or associated works change, the Applicant should identify which environmental assessments and plans require updating.

The purpose would not be to create another large body of evidence. It would provide a single document through which the Examination, Interested Parties and local residents can follow the development of the Site 1B decision from the early alternatives through to the final proposal.

6.7 Conclusion

BEPS's concern is therefore not that East Pye undertook no site-selection work.

The concern is that the route from the earlier alternatives to the present Site 1B grid hub is difficult to follow because the process evolved over time, the evidence is spread between different documents, land availability formed part of the selection process, and the scale and role of Site 1B itself developed substantially.

The National Grid Substation is permanent infrastructure and Site 1B now forms the centre of a much wider cluster involving the Project Substation, BESS, overhead-line works, cables, access and associated development.

For a decision of that importance, the Examination should be able to follow a clear evidence trail showing:

- why this location was selected;
- what alternatives were genuinely considered;
- how landowner willingness affected that process;
- whether the same constraints were applied consistently;
- how the Horlock Rules influenced the decision; and
- whether a less extensive or less intrusive substation design was reasonably available.

BEPS therefore asks the Examining Authority to require the Applicant, with NGET where appropriate, to provide the consolidated audit information identified above before the close of Examination.

That would allow the final Site 1B grid-hub proposal to be considered on the basis of a clear and transparent site-selection and design record, rather than requiring the reasoning to be reconstructed from a number of separate documents.

Chapter 7 Climate Change

Residents object to the adequacy of East Pye's climate-change assessment for Great Moulton, Site 1A–1D and the BESS / grid-hub area.

East Pye should demonstrate climate resilience of the Site 1 grid hub and BESS under future rainfall, heat, drought and storm conditions. The assessment should include climate-adjusted runoff modelling, soil compaction and infiltration, drainage exceedance, firewater containment, emergency access during extreme weather and local microclimate effects on hedgerows, fields and receptors.

Our objection to an Environmental Impact Assessment that relies on the climate benefits of solar generation while failing to demonstrate that this particular development, in this particular rural location, is resilient to the climate pressures now expected over its operational lifetime.

Chapter 8 Landscape and Visual

Great Moulton and the surrounding Plateau Farmland are defined by open agricultural views, historic field patterns, quiet lanes, public rights of way and rural tranquillity. The proposed National Grid substation, project substation, BESS-linked infrastructure, fencing, lighting, access tracks and associated works would introduce a permanent industrial character into a landscape whose value lies in openness, continuity and low levels of built form.

The harm is not limited to individual viewpoints. Residents, walkers, cyclists, horse riders and neighbouring parishes would experience the combined effect of panels, substations, pylons, lighting, security infrastructure and construction access as a single infrastructure cluster. Screening would not remove that harm; it would itself alter the open rural character of the landscape.

The LVIA should be receptor-led for Great Moulton and should assess the combined appearance of solar arrays, National Grid Substation, 400 kV Project Substation, BESS, pylons, fencing, lighting, access and mitigation planting. Screening cannot be treated as a complete answer because it can itself alter openness and the historic plateau character.

8.1 Applicant's own LVIA findings

The existence of substantial landscape harm is not simply BEPS's interpretation. BEPS's consolidated review of the Applicant's LVIA records Major Significant effects at Site 1 during construction, at Year 1 and continuing at Year 15, together with a description of a “total change” to key landscape characteristics. The BESS also remains Moderate Significant at Year 15.

Those findings are directly relevant to alternatives and site selection. Where the Applicant's own assessment identifies enduring significant effects from the selected Site 1 grid hub.

The ExA should address not only how the infrastructure will be screened, but why this location was selected and retained in preference to reasonable less harmful alternatives.

8.2 Misrepresentation of images

We ask the ExA to request the Applicant to provide coordinates, camera height, lens information and the receptor represented for any disputed image.

8.2.1 Clarification of where this image was taken?

We submit this photographic image **is not** part of Great Moulton Landscape

View Location Reference: Site 1/National Grid Sub Station - VL2 (b)



Site Context Photograph (2 of 2)

This panorama is not to scale. For contextual information only



8.2.2 Site 1B - Distortion of site looking towards Village Boundary

The panoramic photo creates a huge distortion of the actual distance between the properties and field boundaries of Oak Farm and Laburnham Farm and even Potters Crescent

Where wide-angle images are used, we request verified visualisations or equivalent images at standard focal lengths and from agreed receptor locations.

EAST PYE WIDE ANGLE LENS



Photographic Image taken from same location using normal lens

The Boundary to beginning of Village Boundary



8.2.3 Site 1B - Distortion of site looking towards Broadgate Lane from Frith Way

This Image shows the National Grid positioning, (the image appears to have been taken with a wide angle lens, distorting the depth of the landscape. The image is taken from Frith Way looking towards Broadgate Lane. This image does not reflect that its boundary is close to other residential boundaries or Narrow Gate Lane PRow

We submit that the Applicant should supply close-up images - giving the proposed perspective of the POC Substation at all four views within sub-site 1B, using a normal lens. Giving clear measurements at each boundary.



Chapter 9 Ecology and Biodiversity

The ecological concerns around Great Moulton are not marginal. Site 1 and the surrounding landscape sit within a sensitive network of hedgerows, ditches, ponds, ancient woodland edges, dark corridors and field margins used by Barbastelle bats, other bat species, birds, great crested newts, mammals and notable verge flora.

The proposed infrastructure would fragment this network through fencing, lighting, trenching, access works, noise, construction disturbance and long-term land-use change. The particular concern is the combined effect of the National Grid substation, project substation, BESS-related infrastructure, solar arrays, cable routes and maintenance activity on functional ecological connectivity.

The ecological case should address the final grid-hub layout, including bat corridors, dark corridors, hedgerows, ponds, ditches, great crested newts, birds, botanical interest and BNG baseline.

The ExA should require updated survey validity and licensing deliverability evidence before relying on deferred mitigation.

Chapter 10 Water Environment

Great Moulton has a sensitive rural water environment and the water assessment should be consolidated into a Site 1 / BESS source-pathway-receptor model, with private water supplies, groundwater, ditches, drainage, transformer oils, BESS firewater, sediment control, baseline monitoring and alternative supply commitments secured in enforceable requirements. East Pye has identified and assessed private water supplies and other lawful water users, including through APP/6.3.16.1 and APP/6.3.9.3. The remaining issue is whether the assessment and proposed controls provide sufficient protection for individual receptors potentially affected by the Site 1/BESS development.

The assessment should therefore be considered on a receptor-specific source–pathway–receptor basis, having regard to the local geology and groundwater environment, construction activities, foundations and piling where applicable, drainage arrangements and the potential movement of contaminants.

Particular consideration should also be given to the management of contaminated runoff and firewater associated with the BESS, including how such water would be contained and prevented from reaching groundwater, surface-water features or private abstractions.

BEPS considers that the Examination should establish whether appropriate baseline information, receptor-specific monitoring and clearly secured mitigation are in place before

relevant construction activities commence, together with an appropriate response procedure should water quality or supply be affected.

10.1 Independent hydrogeological review

The water objection is further reinforced by the independent H Fraser Consulting review summarised in BEPS's consolidated evidence. HFCL identifies 15 technical deficiencies concerning the conceptual hydrogeological model, WFD assessment, water resources, private supplies, groundwater-dependent terrestrial ecosystems, firewater, foundations and other pathways, and concludes that there is a “significant lack of confidence” that impacts on the water environment are properly understood or capable of mitigation.

This is particularly relevant at Site 1, where substations, BESS infrastructure, hardstanding, transformers, foundations, drainage and firewater controls are concentrated. It strengthens the case that later Foundation Works Risk Assessments, drainage details and construction method statements should refine an already demonstrated acceptable solution, rather than determine after consent whether an acceptable solution exists.

Chapter 11 Cultural Heritage

Heritage should be assessed as a landscape-wide setting issue, including historic lanes, field patterns, archaeological sensitivity, listed buildings, Wacton and Tivetshall context, dark skies and tranquillity, not as isolated asset impacts. The effect of a permanent grid node on historic landscape legibility should be specifically addressed.

The DCO should not proceed without a full cumulative heritage-setting assessment, receptor-specific dark-sky and lighting evidence, archaeological safeguards and a clear explanation of why less harmful locations have not been selected.

Chapter 12 Transport and Access , Public Rights of Way and Glint/Glare

Great Moulton, Tivetshall and surrounding villages rely on narrow rural lanes with soft verges, deep ditches, limited passing places and little or no pedestrian infrastructure. The Transport and PRow assessment should cover rural-lane suitability, abnormal loads, HGVs, worker traffic, verge/ditch damage, Station Road, Frith Way, Lodge Road, Hundred Lane, Narrowgate Way, emergency access, cyclists, equestrians and walkers. Glint / glare should be receptor-specific for homes, PRow, roads, rail and aviation.

The ExA should require a definitive Frith Way and Station Road access-management schedule, including phasing, closures, PRow, emergency access and simultaneous restriction controls and proposed Haul Routes

Chapter 13 Noise and Vibration

Great Moulton is a quiet rural parish with very low background sound levels, particularly at night. In that context, construction noise, HGV movements, reversing alarms, piling, generators, transformers, inverters, cooling fans and BESS equipment would be highly noticeable and intrusive. The concern is both temporary and permanent..

East Pye has not demonstrated that the evidence it has presented on the anticipated noise and vibration studies are accurate and well defined. The purpose of requesting a private study is to bring to the attention of the Planning Inspectorate this fact. See Appendix 2.

Noise should be assessed for construction, decommissioning and operation against a very quiet rural baseline, The Applicant should demonstrate how LOAEL and SOAEL thresholds have been applied to this rural baseline, how low-frequency and tonal noise have been assessed, how night-time impacts will be controlled, and how cumulative noise from Site 1, Site 2B, BESS and National Grid infrastructure will be prevented from causing unacceptable harm.

The unaddressed issue of the permanence of the National Grid POC and the proposed haul Road across The Bess Site and Site 1 needs to be resolved.

13.1.1 Great Moulton - Private Consultants - Noise Analysis

The Oakridge review will be retained as Appendix 2 and used to identify the technical questions for East Pye: source sound levels, locations, tonal corrections, low-frequency assessment, night-time levels, cumulative plant and post-installation monitoring.

The evidence presently before the Examination does not justify the siting of permanent, large-scale transmission infrastructure on Grade 2 agricultural land within an exposed rural landscape close to homes, public rights of way, ecological receptors, heritage assets, and private water supplies. Nor has East Pye demonstrated that the Great Moulton location represents the least-harm or most appropriate option when compared with reasonable alternatives.

Chapter 14 Air Quality

Great Moulton currently benefits from clean rural air and has no comparable industrial emission source.

Air-quality controls should include dust, diesel emissions, construction traffic, soil disturbance and BESS / transformer incident emissions.

The BESS also raises a distinct air-quality and safety concern because thermal events can release toxic gases, combustion products, particulates and contaminated residues. In a rural location surrounded by arable fields, hedgerows and dry vegetation, the risk of secondary fire spread and emergency access constraints must be assessed as part of the environmental case.

The definition of “maintain” in the DCO must be tightly constrained so future replacement or refurbishment works do not create new environmental effects without proper assessment. and controlled for dust, emissions, construction traffic, operational maintenance, fire response, contaminated runoff, monitoring and decommissioning.

Chapter 15 Socio-Economics

The socio-economic harm is wider than direct construction employment or landowner benefit. Great Moulton’s local economy is tied to productive agriculture, rural contractors, tourism, quiet lanes, heritage visits, pilgrimage routes, equestrian use, country pursuits, local accommodation and the broader appeal of an unspoilt rural landscape.

The proposed infrastructure would reduce the attractiveness and usability of the area by replacing tranquillity, open views and historic rural character with substations, BESS compounds, fencing, lighting, traffic and operational noise. It would also remove productive farmland and reduce demand for agricultural contracting, machinery, seasonal labour and related rural services.

East Pye should be required to assess these local economic losses, including impacts on rural businesses, tourism, equestrian activity, agricultural contractors, property amenity and long-term confidence in the area. The benefits of the scheme should not be overstated unless they are compared transparently with these local and cumulative harms.

Chapter 16 Soils and Agriculture

The land around Great Moulton contains high-quality agricultural soils, including Grade 2 Best and Most Versatile land. The Applicants’s own material identifies Grade 2 land within Site 1, the National Grid substation area, the project substations, the BESS site and assumed areas of Site 2B. This is not marginal land; it is productive agricultural land with long-established soil structure and historic agricultural continuity.

APP/6.3.15.1 – ES Volume 3, Appendix 15.1: Agricultural Land Classification Report. This contains the detailed survey undertaken by Amet Property Ltd and the maps showing the distribution of the agricultural land grades, including Grade 2, Grade 3a and Grade 3b land.

The proposal would cause temporary, long-term and permanent harm through compaction, trenching, foundations, access tracks, hardstanding, substations, BESS infrastructure, altered drainage, contamination risk and potential panel degradation. The National Grid substation and other fixed infrastructure cannot be treated as reversible solar occupation because they permanently remove or alter agricultural land.

The Applicant should provide a field-by-field ALC/BMV schedule distinguishing temporary, long-term and permanent land take, compaction, trenching, foundations, hardstanding, drainage change, restoration

Chapter 17 Ground Conditions

Great Moulton's ground conditions reflect centuries of agricultural use with limited deep disturbance.

The risks include compaction, altered drainage, localised flooding, subsurface barriers, ground instability, contamination from oils or fire residues, and long-term degradation from infrastructure remaining in place for decades. These risks are particularly important where homes, lanes, ditches, water supplies, archaeological remains and productive fields sit close to the proposed works.

The Applicant Ground condition assessments should cover geotechnical stability, piling, trenching, compaction, contamination pathways, UXO where relevant, drainage stability, archaeological sensitivity and remediation. Baseline and monitoring commitments should be secured before intrusive works.

Without these, the Examining Authority cannot be confident that ground integrity and agricultural viability will be protected.

Chapter 18 Electromagnetic Fields

The proposal would introduce new EMF sources into a rural parish with no comparable baseline, including the National Grid substation, project substations, high-voltage cabling, inverters, transformers and BESS infrastructure. The relative increase in exposure is therefore material for nearby homes, gardens, PRow and sensitive receptors.

Children, residents, wildlife and aviation receptors require particular consideration. The concern is not simply whether generic public exposure limits are met.

The EMF assessment should map receptors, cable routes, overhead lines, substations, PRow and homes. The issue is not only generic compliance with public exposure limits but the

cumulative infrastructure layout and the adequacy of separation and shielding. Until this evidence is provided, the EMF assessment should be treated as incomplete.

Chapter 19 Other Environmental Matters

The utilities assessment does not yet demonstrate that the scheme can be delivered without unacceptable risk to existing services and community resilience, this is particularly important in a rural parish where residents may rely on private wells, shallow utility routes, broadband connections, emergency medical alarms and constrained local access. Loss of connectivity, water supply, access or service reliability would have serious consequences for daily life and public safety.

Utilities, broadband, telecoms, glint/glare, waste, materials and human health should be assessed in a way that reflects rural community resilience. The Applicant should provide utility surveys, diversion/protection plans and service-continuity commitments.

These matters should not be left to unresolved post-consent detail.

Chapter 20 National Grid Infrastructure Cluster

The National Grid substation, project substations, BESS-related infrastructure, transformers, inverters, cabling corridors, access roads, fencing, lighting and associated works form a permanent industrial cluster. This cluster would remain as a long-term grid node even if solar elements were later removed, and it should be assessed as a single operational and cumulative development with a clear permanent legacy.

The combined impacts include operational noise, low-frequency hum, lighting, visual intrusion, fire and major accident risk, emergency access requirements, firewater containment, contamination pathways, glint and glare, rail and aviation safety concerns, and long-term landscape industrialisation. These impacts fall on a rural parish with private water supplies, narrow lanes, sensitive ecology and valued PRow.

Chapter 21 Cumulative and In-Combination Effects

The central planning issue is cumulative harm. Cumulative effects should include overlapping construction, operation, maintenance/replacement, decommissioning, future grid-node effects and other energy proposals. The assessment should address the lived experience for Great Moulton, Tivetshall and Wacton.

Cumulative effects include loss of rural quiet and dark skies, visual industrialisation, ecological fragmentation, heritage harm, repeated construction traffic, ongoing maintenance and

replacement traffic, noise, air quality impacts, loss of BMV land, pressure on utilities and private water supplies, glint/glare effects, and mental health impacts from long-term uncertainty and loss of place.

Chapter 22 Human Health and Wellbeing

The Human Health assessment should consider the consequences for residents and other users who rely upon private water supplies if construction or operation of the Scheme were to affect water quality, quantity or reliability.

East Pye has undertaken assessment of private water supplies and lawful water users. The relevant human-health question is therefore whether the proposed prevention, monitoring and response measures provide adequate protection for households dependent upon those supplies.

This includes consideration of potential contamination arising from construction activities and, in relation to the BESS, the consequences of an abnormal incident involving contaminated runoff or firewater. The detailed hydrogeological pathways and mitigation are addressed in the Water Environment chapter; the Human Health chapter should address the resulting exposure and welfare implications for affected receptors and the measures available to maintain a safe and reliable alternative supply if required.

Human health and wellbeing are material considerations under EN-1 and EN-5. Great Moulton's health and wellbeing baseline is defined by rural quiet, clean air, dark skies, safe walking routes, access to countryside, social cohesion and the daily use of lanes and PRow as the parish's functional green space. Human health and wellbeing should assess sensory and community effects: noise, lighting, traffic, loss of safe recreation, glint/glare, EMF concern, uncertainty, rural isolation, access disruption and vulnerable residents.

The Applicant must now scope back in the "Human Health and Wellbeing" as specified by the ExA at the ISH on September 17

Chapter 23 Great Moulton Specific Issues

Great Moulton should be treated as a place-based receptor. The central issue is whether the village edge can absorb a permanent and high-voltage grid hub without unacceptable harm to amenity, safety, landscape, water, ecology, PRow, agriculture and heritage.

The Applicant's own site-selection narrative shows that the project became driven by the need to find a new 400 kV connection location after Norwich Main was unavailable. That history makes it essential to test whether the chosen Great Moulton/Tivetshall location is genuinely least harmful or merely grid-convenient.

The proposal raises unresolved concerns on site selection, reasonable alternatives, Horlock Rules compliance, Grade 2 BMV land, GIS alternatives, fire safety, private water supplies,

drainage, long-term landscape change, lighting, bat activity, great crested newts, access routes, Frith Way, Lodge Road, Hundred Lane, PRow, FP13, residential amenity, glint and glare, and the proportionality of imposing permanent infrastructure on a small rural community.

East Pye should be required to provide updated and integrated documents where layout, access, grid works, tower works, substation design, BESS relationship or mitigation has changed. This should include updated works plans, land plans, draft DCO, Book of Reference, grid connection statement, LVIA, RVAA, drainage and flood-risk material, ecology and BNG evidence, heritage and settings assessment, soils evidence, LEMP, decommissioning plan, traffic/access assessment, glint/glare/aviation assessment and any compulsory-acquisition or protective-provisions material affected by the change.

The Planning Inspectorate should not allow these matters to be deferred or treated as minor. The residents of Great Moulton, Tivetshall and Wacton require a clear, evidence-based explanation of why this location has been selected, why less harmful alternatives have been rejected, and how the full cumulative effects of the National Grid substation and associated infrastructure.

Chapter 24 Core position.

BEPS and residents do not dispute the national need for renewable electricity generation or the important contribution that solar generation can make.

Our objection is more specific. **East Pye must demonstrate that the particular land, infrastructure and configuration now proposed across Great Moulton, Tivetshall and Wacton are appropriately justified, having regard to the reasonable alternatives considered, and that their environmental and community effects have been adequately assessed and secured.**

This is particularly important for **Sites 1A–1D, Site 2B and the BESS/Site 1 grid-infrastructure cluster**, where solar generation is combined with, or affected by, major electrical infrastructure, access, cabling, substations, overhead-line works, drainage, mitigation and associated development.

East Pye states in its Site Selection Assessment that previously developed land, brownfield land, industrial land and commercial rooftops were considered, but that no suitable land of sufficient scale was identified for the proposed 500 MW utility-scale solar development. [APP/7.20, paras 4.4.9–4.4.14; APP/7.14]

The Examination issue is therefore not whether those alternatives were mentioned, but whether the Applicant has demonstrated that the exercise was sufficiently robust and remains applicable to the Scheme now proposed.

East Pye should therefore explain:

- the geographical extent and date of the brownfield and previously developed land search;
- the basis for excluding sites below the thresholds used in APP/7.20;
- whether combinations of smaller sites and commercial or other suitable roofspace were meaningfully considered;
- why the assumptions concerning the scale and distribution of land required were reasonable;
- whether that assessment was revisited after the Point of Connection moved to Great Moulton and Sites 1 and 2 were subsequently added;
- how the preference in EN-3 for suitable previously developed, brownfield, contaminated and industrial land was applied;
- how the later identification of substantial Grade 2 and Grade 3a Best and Most Versatile agricultural land affected the continued selection and retention of the agricultural land now proposed; and
- whether reasonable opportunities to reduce the overall agricultural-land requirement, remove individual fields or relocate particular infrastructure were reconsidered as the Scheme evolved.

BEPS does **not** suggest that East Pye is required to pursue every conceivable alternative method of producing renewable electricity, nor that rooftop solar elsewhere is automatically a substitute for this 500 MW NSIP. The relevant question is whether the **reasonable location, scale, layout and design alternatives capable of meeting the objectives of the proposed development** have been transparently identified and adequately considered.

The burden remains upon East Pye to explain why the particular Scheme now before the Examination remains justified in light of the environmental information subsequently obtained, the evolution of the grid connection, the concentration of infrastructure around Site 1 and the BESS, the use of BMV agricultural land and the significant effects identified in its own assessments.

Concluding Request

Great Moulton, Tivetshall and Wacton residents respectfully ask the Examining Authority to require East Pye, and NGET where relevant, to provide the outstanding evidence, reconciliations and secured controls identified in this representation before conclusions are reached on the acceptability of the Scheme.

The residents do not seek to undertake the Applicant's design exercise, identify alternative sites on its behalf or reconstruct its environmental case from dispersed application documents. **It is**

for East Pye to demonstrate that the particular siting, land take, infrastructure and design for which consent and associated powers are sought are adequately justified, sufficiently assessed, deliverable and subject to effective and enforceable mitigation.

Where the Applicant relies upon later detailed design, East Pye should demonstrate the assessed worst case and identify the binding control which prevents the eventual development from exceeding that environmental envelope. Where the final NGET connection solution, BESS connection arrangements or other material infrastructure remain uncertain, East Pye should demonstrate that the land, powers and environmental conclusions now sought remain justified under the realistically foreseeable outcomes.

Until those matters are satisfactorily resolved, BEPS submits that the Examining Authority should not assume that the particular Site 1/Site 2B/BESS configuration, associated permanent grid infrastructure and related land requirements have been adequately justified merely from the established national need for renewable energy.

I think this is **stronger for Examination purposes** than the original. It avoids three arguments East Pye could otherwise make immediately: that national need is already established by the NPS, that brownfield/rooftops were in fact considered, and that the policy test does not require East Pye to prove its site is literally the “least harmful” possible location.

The useful challenge is instead: **show us how robust your brownfield/rooftop exercise actually was; show us why its assumptions remained valid after the Point of Connection and Scheme changed; and show us why later Grade 2/BMV and other environmental evidence did not alter the land-selection conclusions.** That keeps the evidential burden where you want it—on East Pye.

Appendix 1

Correspondence between the Village and National Grid Regarding the POC.

East Pye update



[Reply](#) [Reply all](#) [Forward](#) [...](#)

Wed 29/04/2026 15:54

Thank you. I understand things are only just moving forward but in 6 weeks time the planning inspectorate will be starting their process towards recommending or not, we are anxious to know if the PI can give the go ahead for a large substation in the edge of our village without any direct input from yourselves

Could I ask if you have looked at the process that East Pye have used to establish if our village is suitable or landowner led just because it was the easy option, obviously we do understand you cannot tell us anything, but to know that you are taking this process with the attention to detail that is required would at least give the residents some help in coming to terms with the industrialisation of our farming community

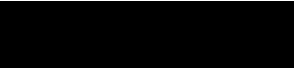
Many thanks


For BEPS community group

Sent from [Outlook for iOS](#)

...

[Reply](#) [Forward](#)



[Reply](#) [Reply all](#) [Forward](#) [...](#)

Wed 29/04/2026 15:29

 You replied on Wed 29/04/2026 15:54

Dear 

I hope you are well. I am aware you recently contacted my colleague  to ask about our plans for a new substation

Following  prior email, I spoke to the project team as promised. Our plans for a potential substation are still at a very early stage, and it is too early to share further details. Please be assured we will contact you and the wider community as soon as we know more.

Thank you again for your interest.

Kind regards,


This email and any attachments are intended for the addressee(s) only and are subject to the data classification below (if any). Regardless of the data classification provided (or lack thereof), the content may contain information that is confidential or privileged.

If you are not the intended recipient, please notify the sender immediately and then delete the email and any attachments. You should not disclose, copy or take any action in reliance on this transmission. You may report the matter by contacting us via our [UK Contacts](#) or [US Contacts](#) pages (accessed by clicking on the appropriate link).

Good morning 

Thank you for this info and the promise of an update if things change.

I have taken the liberty of sending a copy to the contact at Great Moulton Parish Council, [REDACTED], so she has a direct link to you for the future.

Many thanks,

On 16 Oct 2025, at 20:43, [REDACTED]@nationalgrid.com> wrote:

Dear [REDACTED]

Further to my email below I have spoken to our development team regarding a potential connection for East Pye.

To confirm, we are yet to develop plans for a new substation connection in the area and do not have a preferred location. Please be assured we will look to inform you and the local community once we have something to share.

Best wishes

[REDACTED]

[REDACTED]

Head of External Affairs

Electricity Transmission

[Nationalgrid](#)

From: [REDACTED]@nationalgrid.com>

Sent: Wednesday, January 21, 2026 3:20:42 PM

To: [REDACTED]

Cc: [REDACTED]@nationalgrid.com>; [REDACTED]

[REDACTED]@nationalgrid.com>

Subject: RE: [EXTERNAL] Urgent Concerns and Clarification Required: Proposed National Grid Substation at East Pye Solar Park

H [REDACTED]

Thank you for your message.

I am just checking your questions with our project team and will be in touch with a response.

Best wishes

[REDACTED]

[REDACTED]

Head of External Affairs

Electricity Transmission

[Nationalgrid](#)

[REDACTED]
[REDACTED]@nationalgrid.com

National Grid House (Floor 5), 1-3 The Strand, London, WC2N 5EH

[nationalgrid.com](https://www.nationalgrid.com) | [Twitter](#) | [LinkedIn](#)

Please consider the environment before printing this email.

[REDACTED]
Advance notice of holiday:

From: [REDACTED]

Sent: 20 January 2026 12:55

To: [REDACTED]@nationalgrid.com>

Cc: [REDACTED]nationalgrid.com>; [REDACTED]

[REDACTED]@nationalgrid.com>

Subject: Re: [EXTERNAL] Urgent Concerns and Clarification Required: Proposed National Grid Substation at East Pye Solar Park

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe. If you suspect this email is malicious, please use the 'Report Phish' button.

[REDACTED]
Thank you for your response

We were aware that East Pye Solar is preparing a Development Consent Order which they propose to submit in February and as part of this is the proposal for a parcel of land as a potential site for the possible National Grid Substation, what we as a village are concerned about is the proximity of this to the village, some 25 metres from property boundaries and public byeways and given the fact that Norfolk Fire Service have reported that the proposed location is unsafe due to its proximity to homes and it would cause an existential threat to Tibenham Airfield, given the gravity of this situation and this decision on siting for local residents and businesses transparency about how the decisions are made we feel is extremely important and although this scheme has not reached planning it has unexpectedly been given a Gate2 connection (we assume as it has Secured Land Rights), but:

You state that 'The scheme's grid connection agreement requires East Pye Solar to source suitable land for the substation connection and to consent it on our behalf.' Therefore, could you clarify whether National Grid has any say in whether this is a suitable location and if this location is found to be unsuitable due to the various issues highlighted previously at what stage will the National Grid require a new location to be found?

East Pye state they have a Gate 2 connection but I am confused as having read the Queue Management Milestone M1 – Planning Submission - What M1 now requires (updated under CMP434):

If validation has not yet occurred at the time of Gate 2 application, the submitted application itself may be provided temporarily—but the planning reference number must be provided before the Gate 2 Offer is issued."

Therefore as East Pye have not achieved the Gate2 criteria why are the National Grid considering this application?

I look forward to your thoughts

Kind regards

[REDACTED]

We would - Steering Group

From: [REDACTED] [nationalgrid.com](mailto:[REDACTED]@nationalgrid.com)>

Sent: Thursday, January 08, 2026 09:08

To: [REDACTED]

Cc: [REDACTED] [nationalgrid.com](mailto:[REDACTED]@nationalgrid.com)>; [REDACTED]

[REDACTED] [@nationalgrid.com](mailto:[REDACTED]@nationalgrid.com)>

Subject: RE: [EXTERNAL] Urgent Concerns and Clarification Required: Proposed National Grid Substation at East Pye Solar Park

Dear [REDACTED]

Happy New Year and apologies for the delayed response. Below is an update which I hope answers your questions.

As you are aware, East Pye Solar Limited (a subsidiary of Island Green Power) is preparing a Development Consent Order application. The scheme includes proposals for a parcel of land which has been identified as a site for a possible National Grid substation which will connect the solar farm to the high voltage network.

The scheme's grid connection agreement requires East Pye Solar to source suitable land for the substation connection and to consent it on our behalf. We have reviewed the proposals and will continue to work with East Pye Solar, and provide feedback, during their examination process this year.

At National Grid we continually review site selection for potential connections to ensure network needs are met and to support our customers. I am not sure if you are familiar with Connections Reform but for awareness, it is an overhaul of the grid connection process which prioritises projects that are ready and needed to help maintain a reliable network. As part of this, the process will determine if the proposed substation site for East Pye Solar is the most suitable solution when considering other projects progressing through Connections Reform.

Once all these factors have been considered, and the associated work is complete, we will be able to share more information with you and the local community about our plans.

Best wishes

[REDACTED]

[REDACTED]

Head of External Affairs

Electricity Transmission

[Nationalgrid](#)

[REDACTED]
[REDACTED]@nationalgrid.com

National Grid House (Floor 5), 1-3 The Strand, London, WC2N 5EH

[nationalgrid.com](https://www.nationalgrid.com) | [Twitter](#) | [LinkedIn](#)

Please consider the environment before printing this email.

[REDACTED]
Advance notice of holiday:

From: [REDACTED]

Sent: 17 December 2025 17:16

To: [REDACTED]@nationalgrid.com>

Subject: Re: [EXTERNAL] Urgent Concerns and Clarification Required: Proposed National Grid Substation at East Pye Solar Park

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe. If you suspect this email is malicious, please use the 'Report Phish' button.

Hello [REDACTED]

Further to my email of the 6 November, I was wondering if you have been able to ascertain anything relating to this new substation that East Pye Solar are proposing?

We as a village are very anxious about the proximity of this to our village and also as East Pye have managed to obtain a Gate 2 connection with NESO, even though they are not meeting the criteria that NESO have set, we are more concerned about this substation, the build timelines and any consultations that may or not be required before this sub-station is built. Our local councils, both South Norfolk and Norfolk CC, have both expressed their concern about the access routes to build this structure and how they would be able to manage to contain any incidents that may occur.

Also we would like to raise the following points to raise the seriousness of this proposed development.

The proposed new East Pye Solar National Grid substation is located within a groundwater Source Protection Zone in the catchment of a sensitive river, in a landscape containing multiple private drinking water supplies, immediately adjacent to the London–Norwich main railway line and within the safeguarding influence of Tibenham airfield. The local road network is incapable of accommodating the required abnormal indivisible loads, such that access would depend on constructing new haul routes across clay fields, with significant geotechnical intervention, drainage disruption and increased pollution risk to the underlying aquifer and water environment. The site is also located approximately 100 metres from existing homes in and around the village of Great Moulton, and the fire and rescue service has advised that this separation distance is dangerously small for a substation of this scale and type, creating an unacceptable level of residual risk to nearby residents in the event of fire, explosion or major incident. Taken together,

these constraints indicate that the selected site is inherently unsuitable for a substation of this nature, and that the promoter has not demonstrated a realistic, environmentally acceptable or safe means of construction and operation when reasonable alternative locations are clearly available.'

Thank you [REDACTED] and I look forward to hearing from you shortly.

Kind regards

[REDACTED]
We would Steering Group
Great Moulton

From: [REDACTED] <[\[REDACTED\]@nationalgrid.com](mailto:[REDACTED]@nationalgrid.com)>

Sent: 06 November 2025 09:13

To: [REDACTED]

Subject: RE: [EXTERNAL] Urgent Concerns and Clarification Required: Proposed National Grid Substation at East Pye Solar Park

Hi [REDACTED]

I hope you are well and thank you for your latest email.

Let me pick this up with our project team to understand more.

I will be in touch next week.

Best wishes

[REDACTED]
Head of External Affairs
Electricity Transmission
[Nationalgrid](#)

[REDACTED]
[REDACTED]
National Grid House (Floor 5), 1-3 The Strand, London, WC2N 5EH
[nationalgrid.com](https://www.nationalgrid.com) | [Twitter](#) | [LinkedIn](#)

Please consider the environment before printing this email.

[REDACTED]
[Advance notice of holiday:](#)

From: [REDACTED]

Sent: 02 November 2025 19:24

To: [REDACTED] <[\[REDACTED\]@nationalgrid.com](mailto:[REDACTED]@nationalgrid.com)>

Subject: [EXTERNAL] Urgent Concerns and Clarification Required: Proposed National Grid Substation at East Pye Solar Park

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe. If you suspect this email is malicious, please use the 'Report Phish' button.

Dear [REDACTED]

I didn't think I would have to bother you so soon, but we have just received a Targeted Consultation document from East Pye Solar Park. [East Pye Solar - Targeted Consultation Document](#). This highlights significant changes regarding the siting of a substantial National Grid Substation, new pylons up to 61 metres, and a 400kV substation up to 13 metres which have caused significant distress among residents. I am sure you are aware it is imperative that electricity network developments avoid unacceptable impacts on residential amenity, noise and lighting.

The proposed Sub-Site 1B and the additional site 1D allocated for the National Grid 400 kV substation would place major industrial infrastructure just 300 metres from homes and less than 900 metres from the heart of Great Moulton village. This site is entirely situated within an Environment Agency Drinking Water Safeguard Zone and Source Protection Zone 2, encompassing numerous private wells. This raises serious risks to residential amenity, groundwater quality, and public health, especially given the presence of oil-filled transformers and the risk of fire-water run-off posing contamination threats that contravene the Water Resources Act 1991 s.93.

The proposed substation site is directly north of the main London–Norwich railway line, where electromagnetic interference, subsidence from cable trenching, and restricted emergency access present operational and safety concerns for Network Rail.

The site is also located approximately 4 km from Tibenham Airfield, an active glider base, and thus falls inside the CAA CAP 168 ten-kilometre safeguarding consultation zone. The planned 20–25-metre-high gantries and lightning masts would disrupt glider flight paths and necessitate aviation-lighting mitigation.

Also, it may be of interest to you that the developer of Tasway Energy Park has publicly stated an intention to connect to the National Grid at or near Great Moulton. However, the East Pye Solar Targeted Consultation materials do not address this possibility.

Key Concerns:

1. Transparency and Due Process:
 - Why is East Pye proposing a substation of this scale without clear backing or detailed input from the National Grid?
 - You previously clarified that there has been no formal communication or agreement between National Grid and East Pye regarding this location. Is this still the case? The lack of detail regarding the National Grid is leaving the community deeply unsettled and we are concerned that East Pye's documents allude to an agreement between them and yourselves.
2. Suitability of Location:
 - Would National Grid contemplate placing a substation of this scale in a rural area where the road infrastructure is insufficient?
 - Is it acceptable for such infrastructure to be sited so close to homes in a historic farming community, referenced in the Domesday Book?
3. Environmental and Strategic Considerations:
 - We understand National Grid takes a holistic view of environmental impacts when planning new substations. Can you confirm this remains the case, and how such considerations would be applied here?
4. Alignment with Local Policy:
 - The South Norfolk plan explicitly states that the Great Moulton Plateau should not be industrialised due to its heritage and landscape value. We believe these proposals constitute industrialisation and urge National Grid to respect local policy and community sentiment.

Our Requests:

- Please clarify National Grid's current position regarding the East Pye proposal.
- If National Grid has not endorsed this location, when and how will East Pye be informed, and if appropriate, what steps will be taken to ensure a more suitable site is identified?
- Could we ask that National Grid engage directly with our community to address our concerns and ensure full transparency throughout this process.

We hope National Grid will act with sensitivity and uphold its commitment to environmental stewardship and community engagement.

We look forward to your response and to working together to protect the heritage and wellbeing of our village.

Thank you.

Yours sincerely,

[REDACTED]

We would Steering Group

Attached is a copy of the consultation document [East Pye Solar - Targeted Consultation Document](#), a copy of the map, relevant photographs of the site and roads adjacent to site and drone footage of site 1B

From: [REDACTED]@nationalgrid.com>

Sent: Friday, February 20, 2026 8:30:51 AM

To: [REDACTED]

Cc: [REDACTED]@nationalgrid.com>; [REDACTED]

[REDACTED]@nationalgrid.com>

Subject: RE: [EXTERNAL] Urgent Concerns and Clarification Required: Proposed National Grid Substation at East Pye Solar Park

Dear [REDACTED]

Thank you for your recent email and patience. I have been liaising with the wider project team before coming back to you with the latest information.

Island Green's gated position is being determined by the independent National Energy Systems Operator and will be communicated to us in due course along with the customer. Once we know more, we will be in touch to explain next steps. I hope you can appreciate we are unable to share any further insight until this process is concluded and cannot comment on individual customer outcomes.

I appreciate you are also seeking some generic substation images. Substation designs are unique to their location and the volume of customers we are connecting so I don't feel this will help in terms of showing what a potential connection could look like. But please be assured we will keep the local community informed regarding any potential plans.

Best wishes

[REDACTED]

Appendix 2

Noise Impact Assessment Review - by Oakridge Environmental Services

Great Moulton Residents Group – Review of Noise Impact Assessment East Pye Solar – Planning Inspectorate Reference: EN0110014	OE526- N-GMRG-001/V2
--	----------------------



Noise Impact Assessment Review

East Pye Solar

Solar PV station, erection of a battery energy storage facility
(BESS), National Grid substation
and associated infrastructure

On behalf of

Block East Pye Solar and Great Moulton
Parish Council

Great Moulton

Norfolk

Planning Inspectorate Reference: EN0110014

Document Control			
File Name	OES26- N-GMRG-001		
Version No.	V1	Date	27.7.26
	V2	Date	07.8.26
Prepared By			
Checked By			

Contents

1. Introduction.....	4
1.1 Introduction.....	4
1.2 Summary.....	4
1.3 Documents examined	5
2. Stantec Environmental Statement – Noise and Vibration.....	5
2.1 Baseline Sound Survey.....	5
2.2 Noise modelling and calculations	8
2.2.1 Assessment Assumptions and Limitations	8
2.2.2 Operational Assessment of Low Frequency Noise	10
2.2.3 BS 4142 Acoustic Feature Rating Corrections.....	11
2.3 Implications for residential receptors	13
3. Conclusion.....	13

1. Introduction

1.1 Introduction

This report is prepared on behalf of Great Moulton Parish Council in support of refusal of the planning application EN0110014 for the erection of a battery energy storage facility (BESS) and a National Grid substation within the parish of Great Moulton, Norfolk. The BESS and National Grid substation will serve a proposed solar farm which is also part of the application. However, it is the BESS and substation that have the potential to cause significant adverse effects to the residents of Great Moulton. The grounds for refusal include consideration of potential noise impacts stated as follows:

This report is a technical review of the applicant's submitted Noise Impact Assessment and supporting information. It does not purport to provide a complete new operational noise assessment of the scheme.

Rather, it considers whether the submitted information is sufficiently detailed, transparent and robust to allow the decision-maker to conclude that unacceptable adverse noise effects would be avoided. Where the applicant's information is incomplete, uncertain or not capable of independent verification, this report identifies those limitations and the implications for decision-making.

1.2 Summary

The case is not that the BESS and National Grid substation development is inherently unacceptable in noise terms. Rather, the concern is that the submitted information does not provide sufficient information and therefore introduces a high level of uncertainty as to whether adverse noise effects would be avoided or capable of being mitigated effectively once the site becomes operational, particularly having regard to:

- BS 4142 assessment methodology, context and uncertainty;
- The very quiet rural night-time acoustic environment;
- Potential low-frequency and lack of information on tonal characteristics;
- Uncertainty over the final plant specification; and
- Limited information on modelling inputs and scale of uncertainty of the noise propagation model for a large collection of noise sources with a low frequency character

acoustic character, mitigation assumptions and receptor background conditions remain uncertain, the decision-maker cannot be confident that the proposed development would be acceptable in noise terms.

While it is acknowledged that grid-scale battery energy storage systems (BESS), substations and associated electrical infrastructure can often be made acceptable in noise terms, it is respectfully submitted that the current submission does not provide sufficient certainty to conclude that this particular development would not give rise to

adverse or significant adverse effects on residential amenity, particularly during the night-time period and in relation to low-frequency and/or tonal noise.

The BESS is considered in some detail because it appears to be one of the potentially dominant operational noise sources, but the same issues of specification uncertainty, source data, acoustic character, mitigation assumptions and receptor context are also relevant to the National Grid substation and other noisy operational elements of the scheme.

1.3 Documents examined

Report	Prepared by	Date
Environmental Statement Vol. 1: Chap.12 – Noise and Vibration	Stantec	March 2026
Environmental Statement Vol. 2: Figure 12.1 Sound and Meteorological Survey Location	Stantec	February 2026
Environmental Statement Vol. 2: Figure 12.2 Noise and Vibration Sensitive Receptors	Stantec	February 2026
Environmental Statement Vol. 3 Appendix 12.1 Baseline Sound Survey Report	Stantec	March 2026
Environmental Statement Vol. 3: Appendix 12.2 – Noise Modelling and Calculations	Stantec	March 2026
Statutory Nuisance Statement Revision 1	Stantec	March 2026

Table 1 - Reports examined

2. Stantec Environmental Statement – Noise and Vibration

2.1 Baseline Sound Survey

The Environmental Statement on noise and vibration prepared by Stantec provides a baseline noise survey taking data from 51 noise monitoring positions that effectively covers the number of noise-sensitive receptors across this vast site. The survey durations were 6 to 8 days at each location and provide a good representative snapshot of the ambient and background sound levels in terms of broadband A-weighted $L_{eq,T}$, $L_{90,T}$ and $L_{F\ Max,T}$.

However, the report states that as this was an unattended survey, it is not possible to accurately comment on the dominant noise sources or specific noise events during the entire survey period. Comments were given on the on-site environmental sound climate at the time of set-up and collection and these included "on-site sound levels dominated by vehicular movements on the surrounding road network" for the majority of the survey positions and in all 4 of the survey positions reported for Parcel Group 1 which covers Great Moulton.

These are MP41 to MP44. Since no octave or third-octave band data have been published, it is not possible to determine whether road traffic noise is the dominant source of noise in this isolated rural area. The presence of road traffic noise can be indicated by comparing the spectral content of the measured levels with the typical road traffic spectrum set out in BS EN 1793-3 and referenced in BS 8233:2014. This is a concern, as the subsequent noise model and specific sound level assessments rely somewhat on the masking effect of road traffic sound. The DEFRA-funded strategic noise maps produced by Extrium (<http://www.extrium.co.uk/noiseviewer.html>) shows that the A140 to the east of Great Moulton does not appear to have a significant noise impact on the area. (See **Figure 1** to **Figure 3**).

These strategic road traffic noise maps are not a substitute for receptor-specific background sound measurements, but they provide useful context when considering whether road traffic is likely to provide a consistent masking influence at Great Moulton, particularly during the night-time period.

The submitted ES Chapter 12 identifies MP41, MP42 and MP43 as the associated measurement positions for residential receptors in and around Great Moulton, including dwellings on Broadgate Lane and Station Road. The ES also identifies these receptors as high sensitivity receptors.

This reinforces the need for particular caution when applying generic assumptions about the residual acoustic environment at Great Moulton, because the acceptability of the operational assessment depends on whether the measured baseline is genuinely representative of the receptor locations and whether the assumed masking environment is present during the most noise-sensitive periods.

The principal concern at this time is not whether the background sound levels reported by the applicant are numerically correct at the monitoring locations. Rather, it is whether those measurements and the acoustic conclusions drawn from them are representative of the nearest and most affected residential receptors.

The submitted assessment relies upon assumptions regarding the residual acoustic environment, including the degree to which existing background sounds like road traffic, would mask operational noise from the BESS, National Grid substation and associated infrastructure. If those assumptions are not representative of the receptor locations, the conclusions of the BS 4142 assessment may be materially affected. This uncertainty could then be further exacerbated by tonal and character assumptions informing the selected Noise Rating level on which judgement is made as to whether or not there are significant impacts.

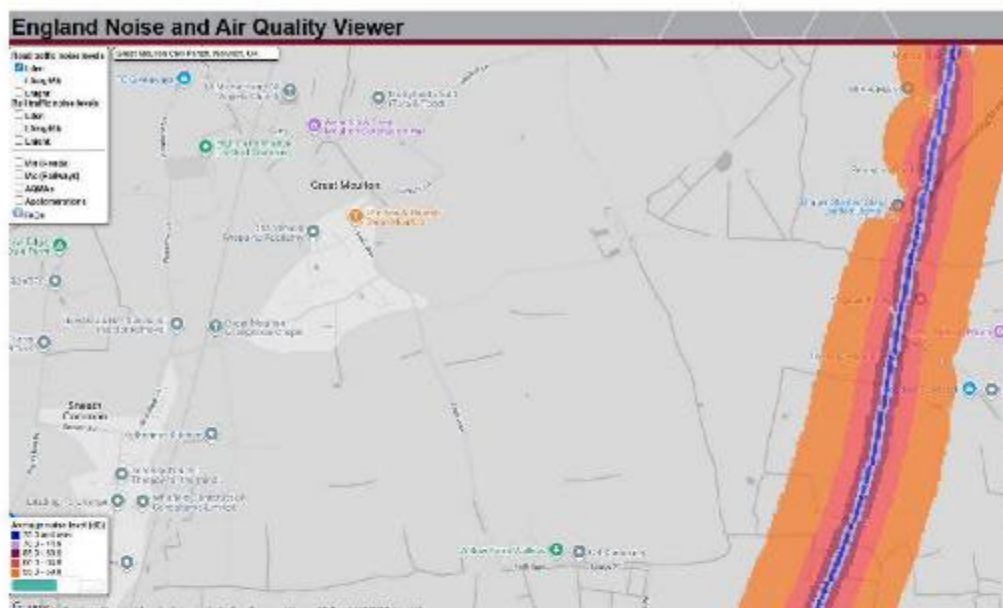


Figure 1- Lden Road traffic noise levels from Extrium



Figure 2 LAeq,16hrs road traffic noise levels (daytime) from Extrium



Figure 3 Night road traffic noise levels from Extrium

2.2 Noise modelling and calculations

2.2.1 Assessment Assumptions and Limitations

The authors have stated that:

"Detailed plant specifications are not available at this stage, and potential noise emissions based on example equipment data have been assessed using an example plant layout which has been based on achieving the Outline Operational Environmental Management Plan..... noise requirements"

The ES Chapter 12 states that the operational assessment has been informed by scheme information but also identifies assessment assumptions and limitations. The submitted information therefore appears to rely on an indicative plant layout and example plant data at this stage.

This is important because the final number, type, layout and operating regime of BESS containers, inverters, transformers and associated cooling plant may materially affect both the overall rating level and the acoustic character of the installation. In a BS 4142 assessment, such uncertainty is not simply a matter of calculation refinement; it affects the confidence that can be placed on the predicted outcome and on the conclusion that no significant effect is anticipated.

This introduces a level of uncertainty that is difficult to evaluate. The authors have prudently used a conservative approach assuming plant operates simultaneously, continuously, and at maximum output. However, there is no indication as to the number of battery storage units to be installed and the authors have made an exception with the BESS by assuming reduced sound levels associated with lower fan duty as a method of mitigation. It is not clear from the report how many units have been used in the calculation of noise from the BESS.

The calculation includes the provision of a 4m high acoustic barrier in areas around the BESS with a surface density of 15kg/m² and an absorptive side facing the battery storage containers.

The inclusion of a 4 m high acoustic barrier as part of the modelled mitigation indicates that operational noise requires material mitigation in order to achieve the assessment conclusions. The effectiveness of that mitigation is therefore central to the reliability of the assessment and should be supported by clear assumptions regarding barrier location, height, surface density, absorption, source heights, frequency performance and long-term deliverability.

Consideration could be given to an earth bund around the BESS and substation site that provides sound and visual screening.

The need for a 4 m high acoustic barrier as embedded or additional mitigation is itself a material indicator that operational plant noise is capable of being significant if not carefully controlled.

The ES Chapter 12 includes operational plant noise assessment tables and residual operational assessment tables, but the robustness of those conclusions depends on the performance assumptions for the barrier, the assumed source heights, source directivity, plant layout and the frequency content of the source data. If any of these assumptions change at detailed design stage, the modelled screening performance and receptor levels may also change.

The sound source data have only been given in broadband A-weighted sound power levels and thus, if the noise model has been calculated in accordance with ISO 9613-2, has used the 500 Hz octave-band frequency to estimate sound attenuation. However, there are concerns regarding low-frequency sound from the BESS, inverters and substations, which will not be addressed by A-weighted broadband levels, and attenuation over distance in the lower frequencies such as 50 Hz and 100 Hz is less than that in the mid to high frequencies.

The ES Chapter 12 reports operational sound power data in tabulated form and concludes that residual effects would not be significant. However, without the supporting octave-band or one-third-octave source data, it is not possible to independently test whether the model has appropriately accounted for low-

frequency propagation, barrier performance at low frequencies or the potential prominence of transformer hum and cooling plant noise at night. This is particularly relevant as the development includes both BESS infrastructure, inverters and a National Grid substation, as these source types can include tonal, low-frequency or otherwise distinctive acoustic components.

The practical implication for nearby residents is that the likely audibility, character and intrusiveness of operational noise cannot be confidently determined from the information currently provided.

This is particularly important at night, when residual sound levels in rural areas may be low and when tonal or low-frequency components may be more noticeable than would be suggested by broadband A-weighted levels alone.

The absence of transparent source spectra and detailed modelling inputs therefore prevents a robust assessment of whether operational noise would be inconspicuous, clearly audible, adverse, or potentially significant at the most affected dwellings.

When considering background noise levels and statements in the applicants noise reports suggesting reliance on traffic noise to provide masking of operational sound, the accuracy and consideration of spectral make-up of the ambient noise is a key consideration to ensure any consideration of impact is as accurate as possible.

2.2.2 Operational Assessment of Low Frequency Noise

The authors of the noise model have provided a calculated 1/3 octave band façade incident external sound level from estimated noise from both the National Grid Substation and the BESS site.

However, it is not clear how the one-third-octave-band sound power levels from the plant have been determined. For example, manufacturer's data or measurements taken from existing sites. Although the authors state that they have used manufacturers' sound power levels of similar plant, this is not documented and only the A-weighted sound power levels are reported.

Without this information it is not possible to check the validity of the estimated sound levels.

The ES Chapter 12 includes operational plant assessment outputs for high sensitivity residential receptors and identifies residual operational effects as not significant. However, the ability to reach that conclusion is dependent on the accuracy of the assumed source spectra and propagation model. If the underlying frequency data are not provided, the assessment cannot be independently checked against the low-frequency criteria or the tonal audibility method in BS 4142. This is a material limitation because a broadband A-weighted level can mask the presence of a pronounced low-frequency component which may be more noticeable inside dwellings, particularly during the night-time period.

This issue is particularly relevant to electrical infrastructure such as transformers and substations, where tonal or low-frequency components may form an important part of the perceived acoustic character. The assessment should therefore demonstrate not only compliance with broadband noise limits, but also that the frequency content and acoustic character of the predicted sound would not give rise to adverse perceptibility or disturbance at nearby dwellings.

It is also not clear how much absorption from the proposed noise barriers located around the BESS has been estimated in the model, but the effective absorption at low frequencies will be affected by the depth of the absorptive layer. This is due to the length of the soundwave, which is equal to the speed of sound in air (m/s) divided by the frequency of the sound (Hz). This can range from 13.7 m at 25 Hz to 2.1 m at 160 Hz. (See **Table 2.**) The use of earth bunds, which have a wider footprint as mitigation, would address some of these concerns.

Frequency (Hz)	25	31.5	40	50	63	80	100	125	160
Wavelength (m)	13.7	10.9	8.6	6.9	5.4	4.3	3.4	2.7	2.1

Table 2 – Typical wavelength values (m) for low frequency 1/3 octave bands (Hz).

2.2.3 BS 4142 Acoustic Feature Rating Corrections

The authors have concluded that neither the BESS nor the National Grid Substation produce any tonal sound, despite stating:

"High voltage transformers can generate a 100Hz hum due to vibration of the transformer coil. The acoustic modelling exercise indicates that the specific sound level from the high voltage transformers, including the 100Hz tone, is unlikely to be distinguishable at the receptor as it will be masked by other broadband sound relating to the BESS inverters and BESS Containers."

Annexe C of BS 4142:2014+A1:2019 provides a 1/3 octave band method for assessing the audibility of tones. If the 1/3 octave band data used in the noise model were provided, this would prove/disprove the likelihood of tones and the value to be added to the Rating Level.

In the absence of disclosed one-third-octave data, it is not possible to confirm whether the transformer 100 Hz component would be sufficiently masked at the receptor, or whether it would remain perceptible during periods of low residual sound.

This is important because the assessment appears to rely on the assumption that broadband BESS-related sound will mask any transformer tone. That assumption may not be robust where the BESS cooling plant is operating at reduced night-time duty, or where weather, plant loading or operating mode changes the relative contribution of the transformer and cooling plant sources.

The authors also state:

"BESS are designed without any noticeable acoustic features due to the broadband nature of the sound. Noise from the proposed development is not likely to be readily distinctive against the residual sound environment. Therefore, no rating penalty has been applied for 'Other Sound Characteristics'."

Section 11 of BS 4142:2014+A1:2019 states:

"The character and level of the residual sound compared to the character and level of the specific sound. Consider whether it would be beneficial to compare the frequency spectrum and temporal variation of the specific sound with that of the ambient or residual sound to assess the degree to which the specific sound source is likely to be distinguishable and will represent an incongruous sound by comparison to the acoustic environment that would occur in the absence of the specific sound. Any sound parameters, sampling periods and averaging time periods used to undertake character comparisons should reflect the way in which sound of an industrial and/or commercial nature is likely to be perceived and how people react to it."

If one-third-octave-band or at least one-octave-band data were available from the baseline sound survey, this could be used to show whether the specific sound level is in fact indistinguishable against the residual background. The authors may be relying on the presence of road traffic noise, particularly in the 80 Hz to 160 Hz one-third-octave bands. However, it has not been demonstrated that road traffic is the dominant noise source in all areas, particularly in Great Moulton where the BESS and National Grid substation are proposed. Road traffic in this rural area is sporadic and there are long periods, particularly at night, when there is very little traffic.

The same concern applies to any reliance on road traffic or general residual sound to mask tonal or low-frequency components from the proposed plant. Masking cannot be assumed from short attended observations or from broadband A-weighted sound levels alone. It should be demonstrated using representative night-time frequency data for the residual sound environment and the predicted plant noise. Without that comparison, there remains uncertainty as to whether tonal components, particularly around 100 Hz, would be perceptible at residential receptors during quiet night-time periods.

In the absence of this information, it is not possible to determine whether the operational sound would be appropriately characterised as acoustically neutral, or whether rating penalties for tonality, intermittency, distinctiveness or other acoustic features may be required. T

his is a material issue because even relatively small changes to the rating level may alter the BS 4142 outcome, particularly where representative night-time background sound levels are low.

2.3 Implications for residential receptors

The implications for residents are not that unacceptable noise effects have been conclusively demonstrated at this stage. Rather, the submitted information does not allow those effects to be confidently ruled out. This distinction is important.

Where a proposed development includes substantial operational electrical infrastructure in a quiet rural environment, the assessment should provide sufficient information to demonstrate that noise from the BESS, National Grid substation, transformers, inverters, cooling plant and associated infrastructure would not result in unacceptable effects at the nearest and most affected dwellings.

The current assessment does not provide sufficient transparency regarding final plant specification, source spectra, modelling assumptions, mitigation performance or the representativeness of receptor background sound levels.

As a result, it is not possible to determine with confidence whether operational noise would be insignificant, acceptable subject to mitigation, or potentially adverse at individual residential receptors. This uncertainty is itself material to the planning decision, because the decision-maker must be satisfied that significant adverse effects on health and quality of life would be avoided before consent is granted.

3. Conclusion

Paragraph 4.43 of the Statutory Nuisance Statement states:

"A noise assessment has been undertaken and is reported in ES Volume 1, Chapter 12 - Noise and Vibration [EN0110014/APP/6.1.12]. This chapter focuses on an assessment of the likely significant effects on noise and vibration as a result of the Scheme. The noise and vibration assessment concludes that no significant noise or vibration effects are anticipated."

However, it is not possible to validate this assessment due to the degree of uncertainty in the submitted assessment. This is due to:

- The lack of detail in plant selection, both for the BESS and National Grid substation;
- Operational assumptions such as reduced fan duty at night and the suggestion of acoustic enclosures without details/specifications;
- Lack of spectral data for both the assumed plant noise and the residual/background sound survey;
- Lack of detail regarding the acoustic barrier performance and the propagation of low frequency noise (<160Hz) over distance;
- Insufficient evidence supporting the decision not to add a feature correction to the specific sound level.

Taken together, the available information does not demonstrate that the development would avoid adverse or significant adverse noise impacts with sufficient certainty. The conclusions of the submitted assessment are therefore not robust, as they are dependent on assumptions which have not been substantiated by project-specific data. Accordingly, the Council's position remains that insufficient information has been provided to demonstrate that acceptable noise levels can be achieved and maintained. The absence of confirmed plant specification, lack of frequency-based source and survey data and limited transparency of the modelling approach collectively introduce a substantial level of uncertainty into the assessment. This is not a minor or isolated uncertainty, but one which has the potential to materially alter the outcome of the BS 4142 assessment.

Relatively small changes in the underlying assumptions — including acoustic character corrections and spectral content — may reasonably result in rating levels within a range indicative of adverse or significant adverse impact. In the context of an exceptionally quiet rural environment, such outcomes may be particularly difficult to mitigate effectively through design or operational controls once the site is constructed.

The ES Chapter 12 records that operational plant noise has been assessed against defined LOAEL and SOAEL thresholds and concludes that residual operational effects would not be significant. However, those conclusions are only as reliable as the assumptions on which they are based. The present review identifies several areas where the submitted information does not allow independent verification of the assessment outcome, including the absence of confirmed plant specification, incomplete disclosure of source spectral data, uncertainty over acoustic feature corrections, limited transparency over barrier performance, and uncertainty regarding the representativeness of the residual acoustic environment at Great Moulton.

If the applicant subsequently provides confirmed plant specifications, source sound power spectra, detailed modelling assumptions, mitigation specifications and representative receptor-based background data, it may then be possible to undertake a more definitive assessment of likely operational impacts. Until that information is available, any attempt to quantify the precise degree of impact at individual dwellings would be subject to significant uncertainty.

This raises fundamental concerns regarding reliance on pre-commencement or pre-operational planning conditions to resolve these issues at a later stage. Paragraph 198 of the National Planning Policy Framework requires planning decisions to ensure that development avoids significant adverse impacts on health and quality of life arising from noise.

Where the submitted information does not allow the decision-maker to confidently conclude that unacceptable noise impacts would be avoided, the appropriate conclusion is not that the matter can simply be deferred, but that the assessment is presently insufficient. The associated Planning Practice Guidance sets out the concept of the Significant Observed Adverse Effect Level (SOAEL), above which adverse effects should be avoided. The potential for adverse or significant adverse noise effects cannot be ruled out with the degree of confidence required.

On the information currently submitted, the proposed development has not demonstrated compliance with Policy ENV2 or national planning policy in relation to noise.

On the information currently submitted, the applicant has not demonstrated with sufficient confidence that adverse or significant adverse noise effects would be avoided, particularly at night and in relation to low-frequency and/or tonal operational plant noise.

Noise is a material consideration in the national Planning Framework. Refusal of the application is therefore justified unless and until the applicant provides sufficient project-specific evidence to demonstrate that the BESS, National Grid substation, Inverters and associated noisy infrastructure can operate without causing unacceptable noise impacts at affected residential receptors.

Appendix 3

Article, regarding the issue of Noise associated with large NSIP developments. [REDACTED] is managing director at RSK Acoustics – 2 April 2025 -

[The sound of solar: Noise in a sustainable world | New Civil Engineer](#)

The noise associated with solar farms, particularly large developments, can be significant and compounded by their rural locations. In these settings, any additional noise can be noticeable and can have an impact on people using and living in the area, as well as local wildlife.

It is often assumed that solar farms don't make any noise, that they are silent generators of clean energy. While the panels themselves make no noise, the infrastructure surrounding solar farms that enables energy to reach our homes does create residual noise. It is important to design for this noise at the start of the process to avoid surprise mitigation further down the project's development that could increase costs and delay planning approvals.

When considered at the scale of solar farm installations that we see in the UK, the electrical infrastructure that enables these large-scale connections to the grid can have an impact on existing noise environments if noise is ignored. Typically developed in rural locations where there is sufficient land to house solar photovoltaic (PV) panels, these naturally quieter environments can often mean that low-level noise emissions that would often go unnoticed in an urban environment have the potential to be disruptive. Managing this is regulated closely by planning policies to ensure any noise brought by the infrastructure is not harmful to wildlife or residents.

National policies such as the National Planning Policy Framework (NPPF) and the Noise Policy Statement for England (NPSE) both provide specific overarching requirements to protect residents and communities from noise associated with developments and promote its effective management for good health and quality of life. At a local level, individual councils and authorities will have their own policies, resulting in some national variation and making it crucial to understand what applies to a specific site. An understanding of acoustics is vital to delivering new projects in line with these regulations and for positive community outcomes. Dispelling myths around sound and solar means appropriately anticipating the impact of an installation and designing mitigation early on.

On a solar farm, it is the supporting infrastructure, such as battery storage, transformers and substations, that produces noise. The significance of that audible noise is relative to the existing environment and the plant chosen. Identifying the right products for the development and working closely with the manufacturers allow for greater control over potential noise. Engaging with the manufacturers at this stage also enables collaborative work on designing the plant for greater noise control and quieter operation when installed

Ambient sound levels typically fluctuate through the course of the day – it is usually quieter overnight than during the day – and vary by location. The bustle of a city will create much more noise than rural countryside. This means that a low-level sound generated by a battery energy storage system or transformer may not be noticeable during the day in the middle of a city, but in the countryside it would be. It is also important to bear in mind the cumulative effect of multiple plants and machines running together; it is unlikely that a solar farm will have a single source of noise.

When there is an understanding of these specific environmental factors, and their relationship with the infrastructure to be installed, it becomes possible to manage noise. To most effectively mitigate potential significant noise, incorporating actions into the design is vital. It means not only cost savings against implementing measures later on but also issues can be removed in their entirety.

Layout is particularly important on large sites where significant infrastructure is needed. It is possible to design in a way that is sympathetic to acoustics, moving sources away from receptors such as residents or wildlife or creating noise barriers with needed site structures. These intelligent designs make use of the natural noise-managing properties of terrain, structures and buildings. If this is considered at the design stage, buildings such as offices and substations that are an integral part of the site can be positioned in a way that they serve as these needed noise barriers.

Making these design elements as effective as possible comes down to accurate early estimations of source noise levels. Preparing models that simulate the acoustics of the site means that mitigation can be designed from the beginning. Like in many construction and engineering disciplines, it's always the case that action to eliminate will be taken before action to insulate. The accuracy of models and plans makes this possible. Engaging acoustic specialists early on enables mitigation to be optimised. Working on the early planning and design stages of the project also means that it is possible for cross-discipline collaboration, opening opportunities for solutions to be found together.

Ultimately, by incorporating acoustic considerations from the outset and integrating noise reduction strategies into the design, we not only align with regulations but also foster harmonious relationships with local communities and protect wildlife. Effective noise management is not an afterthought but a crucial element of sustainable solar farm development that ensures long-term success and minimal environmental impact.

 is managing director of RSK Acoustics, a specialist provider of acoustics consultancy services throughout the world. He has more than 20 years' experience delivering

acoustics solutions to the energy generation and transmission sector around the globe and is a Chartered Environmentalist and Member of the Institute of Acoustics.

APPENDIX 4 : East Pye Solar Application Documents Referenced

East Pye Solar – Planning Inspectorate Reference EN0110014

Scope and method. This appendix identifies East Pye Solar application documents that are expressly cited, named or clearly relied upon as source material in the objection. References have been normalised to the Applicant’s official EN0110014/APP numbering. The “How referenced / relied upon” column preserves the shorthand or alias used in the objection where relevant. Official titles and numbering have been checked against East Pye Solar, Guide to the Application, APP/1.3 (Revision 1, March 2026).

A. Source Based Used

Issue	Source / factual anchor	Technical submission point
East Pye ES Chapter 4 and Grid Connection Statement	Scheme description, grid connection, National Grid Substation, Project Substations and retained infrastructure.	Used to define Site 1 as a grid infrastructure hub.
East Pye ES Chapter 5 and APP/7.20 Site Selection Assessment	Reasonable alternatives, design evolution, Option 4A/4B and siting zones.	Used to frame alternatives and Horlock critique.
East Pye ES Chapters 7-18 and appendices	Landscape, ecology, water, transport, noise, soils, ground conditions, EMF and other environmental matters.	Used to identify topic-specific control gaps.
NGET Relevant Representation and National Grid correspondence	Connection deliverability and National Grid role as recorded in the source draft.	Used to request a formal grid delivery statement.
Ofgem, 17 September 2026 press release and DESNZ/Ofgem April 2026 letter	BESS queue oversupply, Gate 2 context, proposed OTCF and battery surplus risks.	Used to strengthen proportionality and deliverability scrutiny.

Botley West EN010147 Secretary of State request	Recent comparator for further information on solar NSIP alternatives, grid, design and cumulative effects.	Used as persuasive context, not precedent.
--	--	--