

WRITTEN SUMMARY OF REPRESENTATION

East Pye Solar – EN0110014

Site 1 / Great Moulton Grid Infrastructure

Submitted on behalf of BEPS – Great Moulton

1. Core Position

BEPS-Great Moulton does not dispute the national policy support for renewable electricity generation or the contribution that solar generation can make. Our objection is more specific. East Pye must demonstrate that the particular land, infrastructure and configuration proposed at Site 1, particularly Sub-Site 1B, are justified, that reasonable alternatives have been considered on a consistent basis, and that the environmental and community effects of the final development are adequately assessed and secured.

Site 1 should not be treated simply as part of a temporary solar farm. It is the location at which the National Grid Substation, 400 kV Project Substation, Grid Connection Infrastructure, overhead-line and pylon works, cabling, access, drainage, security infrastructure and the adjoining BESS interface are concentrated. These components are functionally linked and should be examined cumulatively as a single grid-infrastructure hub.

2. Site Selection, Alternatives and Grid Deliverability

East Pye has undertaken a site-selection exercise, including APP/7.20, APP/6.1.5 and APP/7.17. The outstanding issue is whether the submitted material provides a sufficiently clear and auditable explanation of how the present Site 1/BESS configuration emerged and why it remains justified.

The original solar-site search was undertaken when Norwich Main was being considered as the connection point. Following the move to a connection on the Bramford–Norwich 400 kV line, Sites 1 and 2 were added and the National Grid Substation options evolved through Options 1, 2 and 3 and subsequently Options 4A and 4B at Great Moulton. BEPS asks the ExA to require a dated, like-for-like comparison showing when each option was identified, what evidence was available, what technical and environmental criteria were applied, and whether Options 4A and 4B received scrutiny comparable with Options 1–3.

The Applicant should also explain transparently when land availability and landowner willingness entered the process and distinguish land rejected for environmental or technical reasons from land not progressed because it was unavailable. Land availability may be a legitimate consideration, but it should not obscure whether reasonable alternatives were compared consistently.

NGET's position also raises a material examination issue. The final connection solution, the responsibilities of East Pye and NGET, and the relationship between the solar and BESS connection positions should be clarified. If the eventual NGET solution could differ materially from that presently shown, East Pye should demonstrate that the Site 1 land take, environmental assessment, compulsory-acquisition case and DCO powers remain justified.

3. Permanence, Design Flexibility and DCO Controls

East Pye's own material distinguishes infrastructure intended to be removed after the approximately 60-year operational period from the National Grid Substation and Grid Connection Infrastructure intended to remain. The retained infrastructure should therefore be assessed as a long-term or permanent presence unless a secured end date is identified.

The Applicant should provide a definitive schedule showing what will be removed, what will remain, who will own and maintain retained infrastructure and mitigation, and what Site 1 will look like after solar, BESS and Project Substation decommissioning.

Because the Scheme relies on the Rochdale Envelope and later detailed design, East Pye should identify every environmentally material parameter that remains flexible and demonstrate the assessed worst case. Each material safeguard relied upon to reach a "not significant" or acceptable conclusion should be linked to a specific DCO Requirement, certified plan, approval body, monitoring mechanism and corrective action.

4. Landscape, Residential Amenity and Noise

Great Moulton is an open, quiet rural plateau characterised by expansive views, dark skies, agricultural land, historic lanes and public rights of way. The proposed grid hub would introduce substantial electrical infrastructure, fencing, security equipment, access, pylon works and associated activity into that setting.

The Applicant's own landscape material identifies significant construction effects at Site 1. BEPS asks for verified plans and representative visualisations showing the combined grid infrastructure from the most affected homes and PRow, with accurate coordinates and measured relationships to the development envelope.

Operational noise also requires further certainty. Great Moulton has a very low rural background sound environment. The submitted assessment relies on indicative plant and layout assumptions. East Pye should therefore demonstrate the cumulative operational effect of the National Grid Substation, Project Substation, BESS, transformers, inverters, cooling plant and other electrical equipment, including tonal and low-frequency characteristics during quiet night-time conditions. Enforceable cumulative limits, post-installation verification and corrective mitigation should be secured.

5. Agricultural Land, Water and Ecology

Site 1 includes substantial Grade 2 Best and Most Versatile agricultural land. The National Grid Substation would cause permanent loss of Grade 2 land, while other grid and BESS infrastructure would also occupy high-quality agricultural land. East Pye should provide a field- and component-specific schedule distinguishing temporary disturbance, long-term occupation and permanent loss, and explain whether the later detailed ALC evidence caused the earlier site-selection conclusions to be reconsidered.

For groundwater and private water supplies, the concern is not that no assessment exists, but that important matters remain dependent on later ground investigation, Foundation Works Risk Assessment and detailed design. East Pye should provide a consolidated source–pathway–receptor assessment covering private water supplies, piling and deep foundations, cable trenches, transformer oils, drainage, contaminated runoff, monitoring, trigger levels and alternative-supply arrangements.

The final infrastructure layout should also be demonstrated to remain within the ecological assessment, including impacts on hedgerows, trees, ponds, bat flight lines and dark corridors, breeding birds, great crested newts and other protected species. Any licensing dependencies should be identified before reliance is placed on the proposed mitigation.

6. Access, PRow, Safety and Whole-Life Effects

The Applicant should reconcile all construction, abnormal-load, operational and emergency access arrangements for Station Road, Frith Way, Lodge Road, Hundred Lane/RB19 and the relevant Site 1 accesses. The purpose and permanence of the Hundred Lane/RB19 crossing should be confirmed, together with restoration obligations if it is not required for retained National Grid infrastructure.

A coordinated PRow schedule should address FP13, FP14, RB19/Hundred Lane and other affected routes, including closures, crossings, permanent access use, vegetation removal, safety, visual effects and restoration.

Site 1 is also a safety-critical infrastructure cluster. East Pye, with NGET and the emergency services where appropriate, should provide an integrated emergency-response statement covering the National Grid Substation, Project Substation and BESS interface, including transformer and electrical incidents, firefighting access, water supply, contaminated-water and oil containment, cordons, road restrictions and operator responsibilities.

The 60-year period should not be treated as one construction event followed only by routine operation. Foreseeable replacement of panels, BESS equipment, transformers and electrical plant may generate renewed HGV movements, abnormal loads, lifting activity, noise and temporary compounds. These whole-life effects should be shown to remain within the assessed and secured envelope.

7. Cumulative Effects and Requested Examination Approach

The principal concern is fragmentation. Residents will experience the National Grid Substation, Project Substation, BESS, pylons, cables, traffic, noise, lighting, drainage, fencing, PRow changes and landscape effects together. BEPS therefore asks for a place-based cumulative assessment for Great Moulton and the Site 1/BESS cluster, rather than reliance solely on separate technical chapters.

BEPS does not ask the ExA or local residents to design the Scheme or reconstruct the Applicant's case from dispersed documents. East Pye, with NGET where relevant, should provide a consolidated **Site 1 Grid Infrastructure Reconciliation Plan and Compliance Schedule** identifying each component, its maximum parameters, temporary or permanent status, delivery and operational responsibility, decommissioning position, environmental effects and the DCO mechanism securing each material commitment.

Before significant weight is placed on the Applicant's conclusions, the Examination should be satisfied that the final Site 1 Grid Hub is clearly defined; that its selection and retention have been transparently justified against reasonable alternatives; that the final NGET connection solution is deliverable; that permanent and cumulative effects are fully understood; and that detailed design cannot result in effects greater than those assessed.

The burden of demonstrating those matters rests with East Pye and NGET where relevant, not with affected residents.

This version should work well as the formal **Written Summary** accompanying the much fuller representation.