

Summary

This representation focuses specifically on sub sites 7A, 7B, 7C, 7D and 7F and their relationship with Saxlingham Green, Saxlingham Nethergate and the surrounding countryside, Public Rights of Way and roads.

I recognise the need for renewable energy generation and the national importance of increasing renewable electricity capacity. However, I believe priority should be given to installing solar panels on rooftops and previously developed land, rather than using productive agricultural land. My concerns relate to whether the particular impacts of Site/s 7 on this part of the local area have been fully and proportionately assessed.

EPS's baseline describes Site/s 7 as an agricultural landscape south of Saxlingham Nethergate and Saxlingham Green, close to settlements with historic interest, including the Saxlingham Green and Saxlingham Nethergate Conservation Area. It also identifies a diverse and concentrated PRow network connecting the settlements and a landscape of wooded horizons creating a sense of high tranquillity.

My principal concerns are:

- The scale and visual effect of Site 7/s;
- The cumulative effects on residents and recreational users;
- Tranquillity and the experience of walking in the area specifically the Boudicca Way and the wider PRow network;
- Construction traffic and road safety, especially affecting women and vulnerable people;
- Whether the proposed mitigation adequately protects the character and use of this area;
- Funding for panel replacement/decommissioning; and
- Use of the Rochdale Envelope Approach

1. Site/s 7 and the character of the area

EPS's Landscape Baseline describes Site/s 7 as comprising irregular small to medium sized fields bounded by established tree belts, hedgerows and woodland groups. It identifies blocks and belts of deciduous woodland, including Ancient Woodland, as being of high ecological and visual quality.

EPS also states that these features create wooded horizons, add variety and create a sense of intimacy within the landscape.

This is important because the existing landscape is not simply an area of agricultural land with no relationship to the surrounding settlements.

It provides the rural setting through which residents and visitors experience Saxlingham Green and Saxlingham Nethergate.

The Applicant itself identifies:

- Saxlingham Green and Saxlingham Nethergate to the north;
- The Saxlingham Green and Saxlingham Nethergate Conservation Area;
- Numerous listed buildings;
- A high concentration of PRows; and
- Boudicca Way within approximately 100m of Site 7F at its closest point.

I therefore ask the Examining Authority to consider whether describing Site/s 7 principally in terms of its ability to accommodate change gives sufficient weight to the relationship between the site and the surrounding settlements and recreational routes.

2. The Green and Saxlingham Nethergate

Of particular concern is PRow Saxlingham Nethergate FP13 on The Green.

EPS's own assessment identifies this location as:

- Adjacent to Site 7D;
- A location used by recreational users, residents and road users; and
- A high-sensitivity receptor.

EPS's Landscape and Visual Impact Assessment subsequently assesses the effect at this location as Major Adverse and Significant. This is a particularly important finding. It means that EPS's assessment itself recognises a significant visual effect at a location which is not simply an isolated recreational path but is identified as being used by residents and road users as well as recreational users.

The Applicant's summary of residual significant effects also identifies:

Site 7D – VL7 PRow Saxlingham Nethergate FP13 on The Green as having a High sensitivity and a short term Major Adverse residual significant effect.

I ask the Examining Authority to consider whether the term "short-term" adequately conveys the practical experience of residents where construction works associated with a development of this scale may continue over a prolonged period.

In particular, I ask:

1. What is the anticipated duration of the significant effect at FP13 on The Green?
2. What construction activities will be visible from The Green?
3. Will construction traffic be visible or audible from this location?
4. Will the route remain open throughout construction?
5. If it is closed or diverted, for how long?
6. What will the alternative route be?
7. Will the alternative route provide an equivalent level of safety, convenience and recreational experience?

3. The wider Saxlingham Nethergate PRow network

The issue at The Green should not be considered in isolation.

EPS's visual assessment identifies a substantial network of routes around Site/s 7, including:

- Saxlingham Nethergate FP9 Site 7F;
- Saxlingham Nethergate FP10 Site 7F;
- Saxlingham Nethergate FP11 Site 7F & Site 7E;
- Saxlingham Nethergate FP12 Site 7D;
- Saxlingham Nethergate FP13 Site 7D;
- Saxlingham Nethergate FP14 Site 7D;

- Saxlingham Nethergate FP15 Site 7D;
- Saxlingham Nethergate FP25 Site 7C;
- Saxlingham Nethergate FP26 Site 7A;
- Saxlingham Nethergate RB17 Site 7D; and
- the Boudicca Way Site 7A.

EPS's baseline specifically identifies several of these as being adjacent to or within Site/s 7. This creates an interconnected recreational network rather than a series of unrelated paths. The effect of closing, diverting or changing one route may therefore influence the use of other routes.

I ask the Examining Authority to consider whether the assessment adequately addresses the combined effect on the local walking network, rather than assessing each PRow principally as an individual receptor.

4. Boudicca Way

EPS identifies the Boudicca Way as a promoted long distance route and states that it is within approximately 100m of Site 7A at its closest point.

EPS's earlier assessment also identifies VL1/Site 7 – Boudicca Way LDP on Fairstead Lane as an adjacent viewpoint, with recreational users and road users identified as representative receptors.

The Transport Assessment records consultation concerning the Boudicca Way specifically identifies the potential for intensification of construction traffic on Fairstead Lane, which forms part of the Boudicca Way. The consultation record states that the potential for significant disruption to users of the promoted trail was discussed and that temporary diversion options were considered.

The Boudicca Way is not merely a route across the landscape. Its value comes partly from providing a continuous long-distance recreational experience. A temporary diversion around construction works may technically maintain access while nevertheless changing the character and quality of the walking experience.

I therefore ask that EPS provide a clear assessment of:

- The maximum duration of any disruption to Boudicca Way;
- The exact proposed diversion;
- The additional distance created;
- Whether the diversion would remain entirely off-road;
- Whether the diversion would require walking alongside construction traffic;
- Whether the diversion would be suitable for people walking alone;
- How the route would be maintained during wet weather;
- How signage would be provided; and
- How the original route would be reinstated.

5. Construction traffic around Saxlingham

The impact of construction traffic is particularly important around Site/s 7 (The CTMP groups 7A–7F together) because several of the proposed construction routes pass through a rural road network characterised by narrow carriageways, single-track sections, limited passing opportunities and, in places, an absence of footways.

EPS's Outline Construction Traffic Management Plan (APP/7.6) identifies Fairstead Lane, Broaden Lane, Bussey's Loke and The Green among the highway links that may require temporary road or lane closures to establish site accesses or undertake cable route trenching. These roads are not simply construction routes; they form part of the established residential and recreational environment of Saxlingham Nethergate and the surrounding countryside.

EPS's Transport Assessment identifies a substantial peak construction traffic scenario. On Fairstead Lane, for example, it forecasts 11 HGV arrivals and 11 departures per day, alongside 39 car, light goods vehicle and shuttle arrivals and 39 departures. These forecasts require careful scrutiny, particularly in relation to the additional vehicle movements that may arise from transporting water to the development, given the stated position that Anglian Water will not supply the project. A particularly serious concern is the provision for emergency vehicle access along the rural roads surrounding Site/s 7 during construction.

The roads in this area are predominantly narrow, rural and, in several locations, single-track. The Applicant's own Transport Assessment describes roads including Bussey's Loke and The Green as single-track, with varying widths, overhanging trees and potentially challenging conditions for two-way vehicle movements. Fairstead Lane is also identified as single-track, with conditions potentially challenging for two-way traffic.

These existing constraints raise important questions about how emergency services will operate when construction vehicles, HGVs, AILs and temporary traffic management measures are present.

Emergency vehicles, including ambulances, fire appliances and police vehicles, may need to reach properties, vulnerable residents, Saxlingham Hall Nursing Home and other facilities at any time. A delay caused by a construction vehicle being unable to pass, a temporary road closure, a restricted access point or a lack of suitable turning and passing areas could have serious consequences, particularly where urgent medical assistance or emergency evacuation is required.

EPS's Environmental Statement, Chapter 11, identifies emergency services as sensitive transport receptors and expressly classifies emergency service routes with limited alternative access as high-sensitivity receptors. It also recognises that rural roads with restricted carriageway widths, limited passing opportunities and inadequate pedestrian facilities can be more sensitive to changes in traffic conditions.

It is therefore important that EPS demonstrates how these recognised sensitivities have been translated into practical, enforceable arrangements for emergency access on the roads around Saxlingham.

I ask the Examining Authority to require EPS to provide clear evidence of:

- Emergency access arrangements: How continuous emergency vehicle access will be maintained along Fairstead Lane, Broaden Lane, Bussey's Loke, The Green and other affected rural roads during all phases of construction.
- Temporary road closures: Which roads may be closed, for how long, what alternative emergency routes will be available and how emergency services will be informed before and during the works.
- Passing and turning facilities: Whether existing passing places are sufficient for emergency vehicles and construction traffic, and what additional facilities or traffic controls will be provided where necessary.
- Emergency response coordination: What procedures will be in place to enable ambulances, fire appliances and police vehicles to pass through or around construction-related obstructions without avoidable delay.
- Access to Saxlingham Hall Nursing Home: How unrestricted emergency access will be maintained to the home,

including arrangements for ambulance attendance and, if required, emergency evacuation.

- Emergency service consultation: Evidence that Norfolk Fire and Rescue Service, the East of England Ambulance Service, Norfolk Constabulary and the relevant highway authority have been consulted on the proposed routes, temporary restrictions and emergency access arrangements.
- Incident management: What immediate measures will be taken if a construction vehicle breaks down, an AIL blocks a narrow road, or an unforeseen incident prevents access along an agreed route.

6. Pedestrian safety and perceived safety

The concern is particularly relevant to Saxlingham because EPS has identified routes which are simultaneously:

- Close to Site/s 7 (The CTMP groups 7A–7F together);
- Used by recreational walkers;
- Used by residents;
- Used by road users; and
- Connected to the wider PRow network.

For a person walking from or around Saxlingham Nethergate, the relevant experience may include several impacts at once: construction vehicles + temporary road restrictions + construction noise + visual change + reduced tranquillity + uncertainty over routes.

The practical effect may therefore be greater than the effect identified under any single environmental topic.

I ask the Examining Authority to consider whether the assessment of pedestrian safety includes perceived safety, rather than only physical highway safety.

This is particularly relevant to people who may choose not to use a route if they feel uncomfortable walking alongside construction traffic.

7. Women and vulnerable users

EPS's Equality Impact Assessment recognises that construction traffic can affect women, older people, children and disabled people. It also recognises that the issue includes perceptions of danger and that large construction vehicles can create feelings of fear and intimidation for pedestrians and cyclists.

EPS specifically identifies women as potentially experiencing increased anxiety when walking in areas with heavy traffic, particularly where footpaths close to roads carrying larger vehicles.

This is directly relevant to the Saxlingham area because several of the identified PRows are immediately adjacent to Site/s 7 and/or roads used by construction traffic and the rural nature of the single track roads mean there are no footpaths.

I therefore ask the Examining Authority to consider:

1. Whether the proposed mitigation has been assessed from the perspective of someone walking alone;
2. Whether the assessment considers early morning and evening use;
3. Whether temporary diversions would require pedestrians to walk alongside construction traffic, often where no footpaths exist;
4. Whether alternative routes would be adequately lit and signed where appropriate;
5. Whether the Applicant has considered the possibility that some people will simply stop using a route because of perceived danger; and
6. Whether this behavioural effect has been included in the assessment of recreational and wellbeing impacts.

8. Tranquillity

EPS's own baseline assessment describes Site/s 7 as having moderate to high tranquillity. It explains that wooded horizons contribute to visual interest and create a mixture of enclosure and openness, limiting views of built form and often creating a sense of intimacy within the landscape. This existing character is important to residents and recreational users. The introduction of construction activity, HGV movements, temporary works, fencing, machinery, lighting and construction noise would represent a substantial change from the existing rural experience.

I ask the Examining Authority to consider whether the assessment adequately distinguishes between:

- The visual presence of development;
- The physical presence of construction activity;
- Increased traffic;
- Noise;
- Movement;
- Temporary lighting; and
- The consequent loss of tranquillity.

These effects may be particularly noticeable on The Green and the surrounding walking routes because these are locations where residents and recreational users currently experience the rural landscape at close range.

9. Landscape and visual effects already identified by the Applicant

For Site/s 7, EPS identifies significant visual effects at several PRow locations.

These include:

- VL5 – junction of Saxlingham Nethergate FP12/FP14 – Major Adverse;
- VL7 – Saxlingham Nethergate FP13 on The Green – Major Adverse;
- VL9 – Saxlingham Nethergate FP9 – Major Adverse;
- VL17 – junction of Saxlingham Nethergate FP10/FP11 – Major Adverse;
- VL20 – Hempnall FP2 on Fairstead Lane – Major Adverse; and
- VL21 – Saxlingham Nethergate FP10 – Major Adverse.

EPS's detailed Landscape and Visual chapter also identifies VL5 and VL7 as significant effects.

This concentration of significant effects around the Site/s 7 PRow network is important. It suggests that the effects are not confined to one isolated viewpoint but occur across a network of routes through which residents and visitors experience the countryside.

10. The relationship between Saxlingham Green and Saxlingham Nethergate

I am particularly concerned that the two settlements should not be considered separately from the countryside surrounding them. EPS itself describes the settlement pattern as including Saxlingham Green and Saxlingham Nethergate to the north of Site/s 7, with their historic interest, listed buildings and Conservation Area.

The surrounding PRow network provides physical connections between the settlements and the agricultural landscape. Consequently, the landscape around Site/s 7 contributes to the setting and character experienced by residents of both settlements.

I ask the Examining Authority to consider whether the assessment sufficiently recognises this relationship. The question is not simply whether solar panels can be screened from particular houses. It is whether the development would materially change the experience of the countryside immediately surrounding the settlements and the routes by which residents and visitors' access and experience that countryside.

11. Mental health and wellbeing

The effects described above also have a wellbeing dimension.

For residents who regularly walk around Saxlingham Green and Saxlingham Nethergate, the countryside and PRow network can provide opportunities for:

- Exercise;
- Recreation;
- Access to nature;
- Relaxation;
- Social interaction;
- Dog walking;
- Horse riding;
- Quiet enjoyment; and
- Maintaining a connection with the local environment.

EPS's Equality Impact Assessment recognises links between mental health and wellbeing and matters including access to green and recreational space, PRowS, perceptions of safety, changes to neighbourhood character and cumulative effects. I therefore ask the Examining Authority to consider whether the loss or alteration of the existing experience around Site/s 7 has been adequately assessed as a combined wellbeing effect, especially for those who are neuro-divergent.

In particular, I ask whether EPS has adequately considered the situation where the same person experiences:

- Visual change at The Green;
- Construction traffic on local roads;
- Changes to walking routes;
- Construction noise;
- Operational noise;
- Reduced tranquillity; and
- Uncertainty about the duration of the works.

12. Duration of impacts

I would ask the Examining Authority to scrutinise the use of the term "short-term" in relation to Site/s 7.

EPS identifies several significant visual effects around the Saxlingham Nethergate PRow network as short-term residual effects. And, whilst EPS acknowledges that highway works are required to enable HGV and AIL movements, there is no full programme outlined with regards to amount of road & highways work required within the OCTMP:

- o How long will the physical highway modifications take?
- o How long will each modified road remain subject to restrictions/works before being restored?
- o What is the maximum period for which residents can expect these highway works and associated traffic management to affect each individual road?

The practical significance of a "short-term" effect depends upon its actual duration. I therefore request that EPS provides, for the Site/s 7 area:

1. the anticipated start and finish dates of construction works affecting PRowS and highways;
2. the duration of each road closure or restriction;
3. the duration of construction activity visible from The Green;
4. the duration of construction activity affecting Boudicca Way;
5. the period during which HGV movements will occur at peak levels; and
6. the anticipated period between the start of construction and restoration of the affected landscape.

Without this information, it is difficult for residents to understand what "short-term" means in actual terms.

13. Cumulative effect around Sites 7

My principal concern is the concentration of effects within one relatively small geographical area.

EPS has identified:

- Significant visual effects;
- Numerous PRowS adjacent to or within Site/s 7;
- Boudicca Way close to Site 7A;
- Temporary road closures;
- Construction traffic on Fairstead Lane;
- Construction activity affecting The Green and other local roads; and
- A landscape currently assessed as having moderate to high tranquillity.

These effects overlap geographically.

I therefore ask the Examining Authority to consider whether the cumulative assessment sufficiently reflects the experience of residents and recreational users in Saxlingham Green and Saxlingham Nethergate, rather than simply considering cumulative effects on a project wide basis.

14. Panel replacement/decommissioning

The East Pye Solar project is currently estimated (by the Applicant) to cost approximately [REDACTED] to construct. The project is privately funded through the parent company Island Green Power, wholly owned by Macquarie Asset Management through its managed funds.

It is a matter of public record that Macquarie was the majority owner of Thames Water from 2006 to 2017. During that period, Thames Water's debt increased from about [REDACTED], while approximately [REDACTED] in dividends were paid to shareholders. More recently, in 2024, a Macquarie investment-management entity was sanctioned by the US Securities and Exchange Commission and agreed to pay [REDACTED] to settle findings concerning the

overvaluation of approximately 4,900 securities and hundreds of cross trades that favoured certain clients. Given this background, I believe it is important that the Examination gives particular scrutiny to the financial security arrangements for the project's entire 60-year operational life, including the costs of replacing panels and other infrastructure, maintaining the site, and fully decommissioning and restoring the land at the end of the project's life.

In its Environmental Statement, East Pye Solar states that:

- The solar PV panels are assumed to have an operational life of 40 years;
- All the solar panels will be replaced once during the 60-year operational period;
- The replacement could take up to 24 months;
- This is separate from occasional replacement of individual panels damaged during operation.

Schedule 2, Requirement 20 – “Decommissioning and Restoration.” (March 2026 Draft DCO, Revision 1. East Pye Solar – Draft Development Consent Order (Revision 1)) gives some high level detail re consultation response when the issue of funding decommissioning has previously been raised EPS stated that East Pye Solar is privately funded and that the financial risks associated with construction, operation and maintenance are “borne by the developer”.

There is, however, no provision in Requirement 20 requiring EPS to:

- Establish a decommissioning bond;
- Provide a performance bond;
- Establish an escrow/decommissioning fund;
- Provide a parent-company guarantee specifically for decommissioning;
- Provide insurance or another form of financial security;
- Ring-fence money for restoration;
- Periodically reassess the amount required; or
- Demonstrate that funds will actually be available at the end of the 60-year life.

I would urge the Planning Inspectorate to ask EPS to disclose the estimated cost of decommissioning and once disclosed to ensure the funds are held securely as suggested above, and not simply be an assertion that the project will (still) have sufficient funds.

15. Use of the Rochdale envelope approach

EPS statements regarding this approach are in a number of the submitted DCO documents:

- Environmental Statement, Chapter 2 – EIA Methodology, paragraph 2.6.2
- Policy Compliance Document
- Non-Technical Summary, paragraph 2.4.1
- Statement of Reasons, paragraph 2.4.2

What is the distinction between EPS using a Rochdale Envelope to assess environmental effects and using it to obtain broad flexibility in what can ultimately be constructed? In its Design Principles, Parameters and Commitments (APP/7.18) EPS states that its design parameters secure the maximum/minimum footprint, width and height of different elements and that these parameters form the basis of the EIA under the Rochdale Envelope approach.

The visualisation methodology identifies VL7 as:

- PRoW Saxlingham Nethergate FP13 on Church Hill;
- Immediately adjacent to Sub-Site 7D;
- Representing recreational users, residents and road users; and
- With a Year 1 and Year 15 photomontage.

The LVIA assesses this receptor as having high visual amenity sensitivity and a significant adverse effect.

If EPS's 180 m northern setback and proposed woodland screening are already incorporated into the maximum-parameter assessment, what does the assessment look like without those measures? And conversely, are those measures actually secured tightly enough that the detailed design cannot subsequently move panels/infrastructure towards the settlement within the wider Rochdale Envelope?

16. Questions I respectfully ask the Examining Authority to consider

Site 7 and The Green

1. What is the precise duration of the significant visual effect identified at FP13 on The Green?
2. What construction activities will be visible from The Green?
3. Will The Green itself or the associated PRoW be subject to any closure, restriction or diversion?
4. How will residents and road users be protected from construction traffic in this location?

Boudicca Way

5. What is the maximum period for which construction traffic will materially affect the Boudicca Way?
6. Will a diversion be required?
7. If so, what is the exact diversion route and how much additional distance will it create?
8. Will the diversion remain safe and attractive for residents & recreational walkers?

PRoWs

9. What is the maximum closure/diversion period for each of the Saxlingham Nethergate PRoWs affected by Site/s 7?
10. Will all routes remain accessible throughout construction wherever reasonably practicable?
11. Where a diversion is required, will it provide a comparable recreational experience?

Traffic

12. Where is the route-specific emergency access plan identifying all affected roads, potential obstructions, alternative routes and measures to maintain access to Saxlingham Hall Nursing Home and surrounding properties.
13. What evidence is there of consultation with emergency services and the nursing home, including confirmation that the proposed arrangements are acceptable to the relevant bodies.
14. Where is the commitment that construction traffic and temporary road closures will not prevent emergency vehicle access, supported by defined procedures, suitable passing places and immediate obstruction management.
15. Provision of a detailed programme of proposed road closures, lane closures and cable trenching works, with sufficient advance notice and clear alternative arrangements.
16. What are the specific measures to protect pedestrians and vulnerable residents on roads without footways, including appropriate traffic management, safe temporary routes and restrictions on construction movements where necessary.

17. How will monitoring and enforcement arrangements, with a clear mechanism for responding immediately to access problems, complaints and unforeseen incidents, be provided.

Safety and equality

18. Has EPS specifically assessed the experience of women walking alone on these routes during & after construction?

19. Has EPS considered the possibility that perceived danger could cause people to stop using the affected routes?

Tranquillity

20. How has EPS assessed the loss of tranquillity associated with construction traffic, machinery, movement, lighting and noise?

Cumulative effects

21. Has EPS assessed the combined experience of a resident or recreational user who encounters visual change, HGV traffic, noise, PRow disruption and reduced tranquillity within the same local area?

Panel replacement/decommissioning

22. EPS must be made to disclose in the DCO the estimated cost of replacing 100% of the PV panels once during the 60 year operation together with the estimated cost of decommissioning at the end of operation, and agree to:

- a. A ring-fenced fund for both;
- b. An additional reserve within the Project finances for the inevitable increase in costs over the operational lifetime;
- c. Agree to a contractual obligation on the Company;
- d. Agree funds to be held by bond or escrow.

The Rochdale Envelope Approach

23. Does the environmental assessment properly demonstrate the effects of the full range of development that the DCO would permit, particularly where different maximum parameters can operate simultaneously and where mitigation is relied upon as an embedded part of the envelope?

And specifically for Saxlingham Green:

- a. What is the maximum panel height actually assessed at each relevant Saxlingham viewpoint — 4.5 m tracker or 3.5 m fixed panel?
- b. Does the LVIA assume the full 180 m 7D setback and proposed woodland screening when assessing The Green?
- c. Are the landscape mitigation measures themselves secured sufficiently precisely to prevent the post-consent detailed design from producing a materially different visual effect within the permitted envelope?
- d. Where the LVIA identifies significant effects at VL5, VL7, VL9, VL16 and VL17, what exactly is the maximum physical configuration producing those effects, and does that same configuration remain available under the DCO?

16. Conclusion

I respectfully ask the Examining Authority to give particular consideration to the combined effects of Site/s 7 on Saxlingham Green, Saxlingham Nethergate, The Green, Boudicca Way and the surrounding PRow network.

The Applicant's own evidence identifies a landscape of moderate to high tranquillity, a concentrated network of Public Rights of Way and significant visual effects at a number of locations around Saxlingham Nethergate, including a Major Adverse significant effect at FP13 on The Green, a route used by residents, road users and recreational users.

These effects should not, however, be considered in isolation. Construction traffic, temporary highway restrictions, PRow diversions, noise, visual change, reduced tranquillity and perceived pedestrian safety may be experienced simultaneously by the same residents and recreational users. The Boudicca Way and wider PRow network are particularly important because they provide access to and through the countryside surrounding both settlements.

I therefore ask the Examining Authority to ensure that the duration, extent and practical consequences of these combined impacts are clearly established, including the adequacy and safety of proposed diversions and traffic management.

I also ask that the Examination carefully considers whether the proposed mitigation and the use of the Rochdale Envelope provide sufficient certainty that the effects assessed will not be materially exceeded by the eventual detailed design.

Finally, I ask the Examining Authority to consider whether adequate safeguards are in place for panel replacement and eventual decommissioning, including appropriate financial security.

My concern is not with renewable energy generation in principle, but with ensuring that the particular impacts of Site/s 7 on this community, its countryside, walking routes and residents are fully understood, properly secured and proportionately addressed before any Development Consent Order is granted.