

East Pye Written Representation – October 2026

Submitted by David Ledsham – resident of Hedenham Parish

Following my attendance on Day 1 (15th September 2026) at the Dunston Hall Hearings, and after viewing the recordings of Days 2 and 3, I have the following points to elaborate on the comments made in my Relevant Representation (reference RR-0436).

Scope of the development being assessed

Island Green Power, the Applicant, has submitted a DCO application for the East Pye project which includes not just the solar farm, being the fields of PV panels, cable connectors and substations but also a Battery Energy Storage System (BESS). The BESS could, I understand, take two broad forms:

- 1 It can be used to smooth out the intermittent supply from the solar farm by using surplus electricity generated by the PV panels, when available, to charge the BESS. The electrical power stored in the BESS would then be released back to the Grid, at times of low or nil solar generation.
- 2 The BESS can also be charged using electricity from the Grid itself, notably during periods of low demand on the Grid when the price available to East Pye is low. This stored power can then be released back to the Grid during periods of high demand when the price offered is higher than that paid by East Pye for the power to charge the BESS. Arbitraging the Grid price in this manner can produce significant profits for BESS operators.

The attractiveness of using the BESS to arbitrage the Grid price is highlighted by the significant number of BESS projects that applied to NESO for a Grid connection. Prior to enacting their Connection Reform programme, NESO had received nearly 3 times as many connection requests for battery projects than the Grid could handle for the foreseeable future. As a result, many of these battery projects were assigned a Gate 1 connection with no definite future connection date.

Whilst the East Pye Solar farm itself was awarded a Gate 2, Phase 2 connection with a connection date at the end of 2031, its BESS was awarded a Gate 1 connection. Therefore, East Pye can only be reasonably confident of having a solar farm connection which itself could be delayed due to the complexity, scale and cost of the National Grid update program and global equipment delays.

The BESS forms a significant element of the East Pye application despite the uncertainty as to when, if ever, a BESS connection is agreed. The Applicant appears confident that when (if) the connection applications window is re-opened they would succeed in obtaining a Gate 2 (Phase 2) BESS connection. I can find no publicly available information to support this level of confidence. Indeed, NESO have stated that no new battery projects will be considered for connections until the existing battery projects with Gate 2 offers are 'ready'.

We consequently have 3 broad development Options:

- 1 Solar farm only
- 2 Solar farm plus BESS for smoothing solar farm output
- 3 Solar farm plus 'super' BESS for smoothing solar farm output and permitting Grid price arbitraging.

There is little doubt that the Applicant is seeking Option 3. These Options will have significantly different financial return implications which I am sure the Applicant has modelled. It may well be that Option 1 and perhaps Option 2 do not meet the Applicants internal investment criteria. Were this the case, it would be unlikely that the project would proceed, at least until the BESS connection issue was resolved. This would place significant uncertainty with regard to the forecast 2028 construction commencement date and leave affected South Norfolk residents in limbo for perhaps several years.

The question appears to be what exactly PINS are being asked to approve when the implications of the different options, and the related investment returns could be markedly different. Indeed, from a magnitude and timing perspective, the forecast investment returns might be unacceptable causing the Applicant to look elsewhere for alternative investment opportunities.

The attitude of the Applicant during the consultations

There has been widespread disappointment amongst South Norfolk residents of the consultation process with a strong sense of the inevitability of ultimate approval of the East Pye application. Many believe this is a done deal and we are simply going through the motions of a consultation process to align with NSIP requirements. Hopefully this is not the case as this consultation process has already involved the investment of thousands of hours by many of those impacted by the proposals to help protect our way of life, assets, livelihoods, local heritage, rural countryside and mental wellbeing.

It appears that much of what East Pye representatives say verbally or in writing to address the concerns of consultees reflects a lack of respect with responses that can appear dismissive. The Applicant's responses reflect limited sympathy for the many negative impacts of the project on local residents and South Norfolk as a whole, reinforcing the view that the development will happen regardless of the views of those parties with whom the Applicant has consulted.

All too often the Applicant's responses fail to properly address the concerns raised or are not directly relevant to the issues raised. In some cases, the Applicant hides behind their stock 'get out of jail' response that the project is important and should proceed to enable the Government to meet its renewable energy targets and net zero objectives. That thinking goes to the heart of the renewable energy debate and overlooks the fact there are alternative approaches to achieving this goal.

Few doubt that the Applicant's primary objective is to make significant long term, relatively low risk investment returns from a 'goldmine' opportunity looked upon favourably by Government. Evidence that the Applicant is genuinely interested in renewable energy and combatting climate change, apart from providing a lucrative investment opportunity, is thin on the ground.

When asked at the recent hearing whether the East Pye sites were chosen with environmental, social and ecological concerns as the primary driver, the Applicant implied this was the case. I would suggest that in practice they started at the proposed grid connection point and sought available land on which to install their solar farm. With proposals for other nearby solar farms already on the table that meant looking east of the connection point. They then focused on signing lucrative lease agreements with sufficient landowners and only thereafter spent their efforts seeking to downplay the damaging impacts of their proposals. These impacts will be evident to all once construction commences and for decades thereafter.

Compensating the affected communities

The financially lucrative nature of the Applicant's proposed Scheme owes much to the fact that they will not be required to pay the 'true' social, economic and environmental cost of the Scheme were it possible to put a figure on this. In practice, this considerable cost will be borne by residents of South Norfolk and by local wildlife despite claims to the contrary. Were the Applicant required to pay any approximation for this 'true' cost it would probably destroy their financial investment case. It is the residents of South Norfolk who will bear the cost whilst the Applicant will accumulate their profits.

In the Applicant's consultation material it was suggested that residents should be proud to be doing our 'bit' towards achieving Net Zero. Subsequently there has been minimal discussion of community benefits let alone compensation with limited mention of benefits to the local economy, employment opportunities and funding for sports and other activities. The Applicant states that their commitment to providing a Community Benefit Fund does not form part of the DCO application and is not required to mitigate the impacts of the Scheme and therefore cannot be considered in the decision making process. This unfortunately reads that in the opinion of the Applicant they do not need, legally or even morally, to pay any form of compensation though they are offering limited amounts in their efforts to 'placate' the Scheme's objectors.

The Applicant has claimed that there is limited evidence that the proximity of a solar farm has a negative impact on property prices. No solar farm close to the size and geographic spread of East Pye has, however, yet commenced construction in the UK. There is already evidence in South Norfolk that the East Pye plans are having a major impact on property prices and on homeowners' ability to sell their properties. Potential buyers seeking to locate to South Norfolk do not want to live near a mega solar farm. Feedback from local Estate Agents is that the prospect of the solar farm has significantly increased the number of local residents seeking to sell to 'escape' from its shadow, including residents advancing their downsizing plans. The few offers being received from prospective buyers are either being heavily discounted (by perhaps 20% or more) on hearing of the Applicant's plans or are not forthcoming in the first place. For Island Green Power, East Pye may represent a lucrative investment opportunity, for some local residents it already represents a financial nightmare.