Objections submitted in response to East Pye Solar

PINS Reference: EN0110014

Land Parcel 7

Compiled by local residents. Submitted by BEPS (Block East Pye Solar [redacted])

Use of Artificial Intelligence

This Written Representation has been prepared by local residents and the Parish Councils of Saxlingham Nethergate, Hempnall etc. in response to a Development Consent Order application comprising many thousands of pages of technical reports, Environmental Statement chapters, plans and consultation responses. Given the scale and complexity of the application, **OpenAI's ChatGPT** and **Adobe Acrobat AI Assistant** were used as drafting and document review tools to assist with summarising documents, improving clarity and cross-referencing information. **Any images included within this Written Representation that have been adapted from the Applicant's documents were edited manually by the authors and were not created or modified using artificial intelligence.**

All arguments, conclusions and opinions contained within this Written Representation have been reviewed and approved by the authors, who accept full responsibility for its contents.

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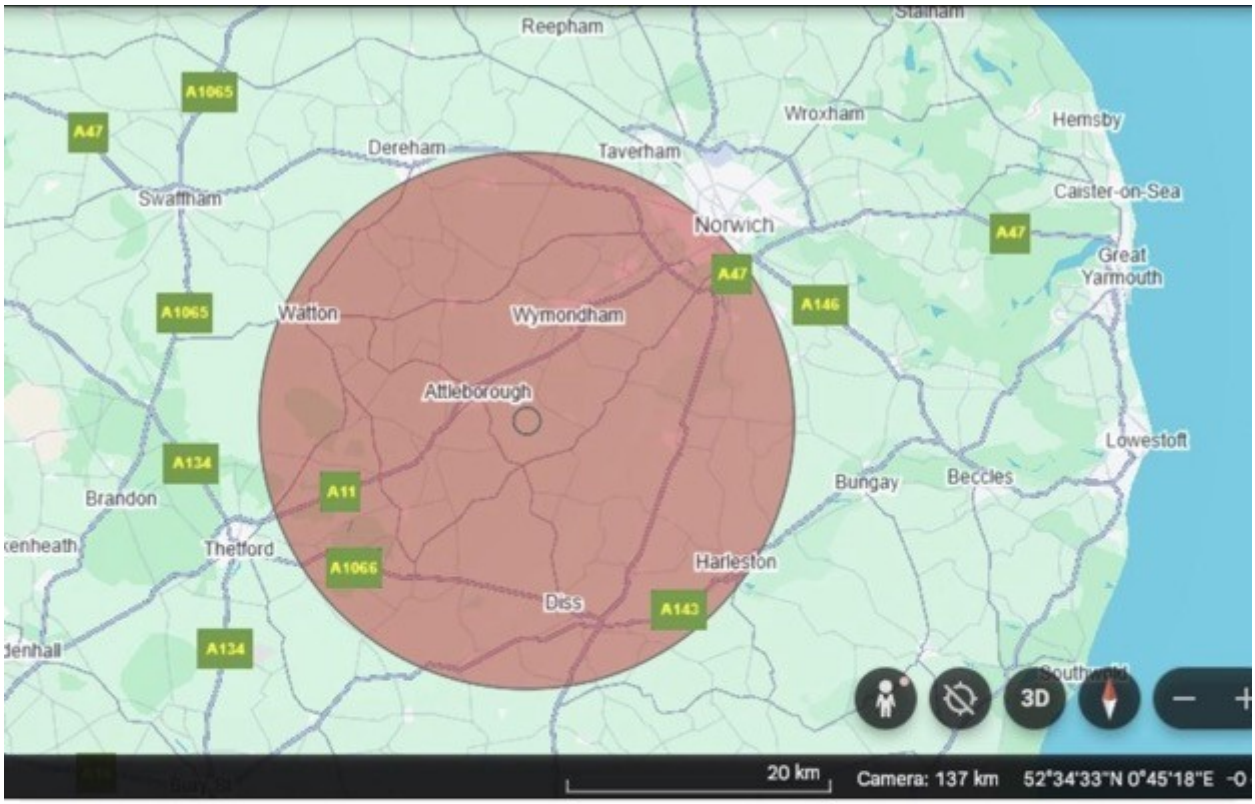
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Data source is https://www.data.gov.uk/dataset/1bd380ca-95d4-4ebe-b04d-501a640302c1/raf-old-buckenham-safeguard-zone

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Site 7 can be extensively seen from the A140 which is slightly elevated. With tracking panels across Site 7 sitting east to west, the panels will be facing the A140 for the latter part of the day and facing the Broaden Lane, Wash Lane and the main route of B1332 to the east.....370

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Executive Summary

Land Parcel 7 suffers from **multiple, interacting constraints which render it potentially undeliverable in practice and in law**. These constraints arise from European Protected Species impacts (barbastelle bats), chalk-stream ecology (River Tas and white-clawed

crayfish), absence of a lawful ecological baseline (botany), and unassessed essential infrastructure (rural fibre-optic broadband).

These constraints are not capable of being resolved through detailed design, conditions or mitigation. **They go to the fundamental feasibility of constructing and operating the Scheme as proposed**.

1. Barbastelle bats – absence of a licensable delivery pathway

Land Parcel 7 lies entirely within **overlapping Core Sustenance Zones (CSZs) for barbastelle bats** and directly adjoins **ancient woodland confirmed to support maternity colonies**. The evidence demonstrates **landscape-scale functional habitat use** is not a localised effect that can be addressed through buffers, planting or construction timing.

As a result, delivery of development within this parcel would require:

- an **EPS licence**; and
- satisfaction of the statutory tests, including *no satisfactory alternative* and *maintenance of favourable conservation status*.

Given the extent of CSZ overlap, the cumulative impact of the wider Scheme, and the presence of multiple maternity colonies, **there appears no credible evidence that a licence could be granted**. The Applicant has not identified any workable alternative layout or strategy that would avoid these impacts.

A scheme component which **cannot realistically be licensed cannot be delivered**, and reliance on post-consent licensing uncertainty undermines the credibility of the Scheme as a whole.

2. River Tas and white-clawed crayfish – hydrological and construction infeasibility

Land Parcel 7 directly adjoins the **River Tas chalk stream**, within a catchment now confirmed to support **breeding populations of white-clawed crayfish**, a strictly protected species.

Delivery of the Scheme would require construction activities with clear risk pathways:

- cabling and trenching;

- potential HDD beneath or near a fissured chalk geology;
- haulage and compaction impacts;
- sediment and pollution risk to the hyporheic zone.

No downstream crayfish surveys have been included in the ES, and therefore **no lawful or credible construction methodology has been demonstrated**. Regulatory approval (including under the Habitats Regulations and the Water Framework Directive) is uncertain at best and likely unobtainable.

Where there is no viable means of crossing, working near, or protecting a chalk stream with protected species, **the land parcel cannot be built out**.

3. Absence of botanical survey – inability to design or mitigate

No botanical survey has been carried out for Land Parcel 7, despite the area's known importance for **rare and priority plant species associated with long-established grassland and roadside verges**.

This omission has direct deliverability consequences:

- the layout cannot be lawfully finalised;
- construction impacts cannot be avoided or mitigated;
- biodiversity net gain claims cannot be substantiated; and
- statutory consultees cannot sign off mitigation or compensation.

A scheme that cannot even identify what ecological assets it would destroy **cannot progress to construction in a controlled or lawful way**.

4. Rural broadband infrastructure – unresolved physical constraint

Land Parcel 7 contains **underground rural fibre-optic broadband infrastructure**, likely including community-led and commercial networks running through verges and fields.

The Applicant has:

- not mapped this infrastructure;
- not consulted operators or users; and
- not assessed diversion, protection or outage risk.

Damage or diversion would disrupt essential services to homes and businesses and could render parts of the Scheme unbuildable or delay construction indefinitely. This is a **practical delivery risk**, not a minor utility issue.

5. National Gas Transmisson – High Pressure Gas Main

The proposed haul road across land parcel 7 crosses over the high pressure gas main. The applicant has not included any evidence that this will be permitted or how it will be achieved.

6. Countryside Stewardship Scheme

Much of Site 7 is currently included in the Countryside Stewardship Scheme until 2028 for the conservation of red-list birds including lapwing, skylarks and turtle doves, as well as other conservation objectives.

This publicly-funded conservation habitat for red-list birds will be destroyed to install the East Pye Solar project. The biodiversity harm this will cause is not reflected in the applicant's biodiversity net gain calculations.

7. Listed Building Harm

The Edelston independent HIA identifies harm to Grade II* Oaks Farmhouse; Grade II Listed Buildings: Hill Farmhouse, Wood Farmhouse, Manor Cottage, Manor Farmhouse, Manor Farmhouse Barn, Hill Cottages, Hill House, Holly Cottage, the Saxlingham Green Conservation Area.

8. Cumulative effect – no credible construction scenario

Taken together, the constraints affecting Land Parcel 7 mean that:

- no licensable ecological pathway has been demonstrated;
- no lawful construction methodology has been shown for the River Tas;

- no ecologically informed layout is possible; and
- no reliable infrastructure protection strategy exists.

The Applicant has therefore failed to demonstrate that **this parcel can be constructed**, let alone operated and decommissioned in compliance with environmental and infrastructure law.

Conclusion – Scheme credibility and viability

Land Parcel 7 is not merely environmentally sensitive; it is **potentially functionally undeliverable**. Its inclusion within the Order Limits requires the Examining Authority to assume that multiple regulatory approvals, licences and mitigation solutions will somehow be secured despite the absence of evidence that this is feasible.

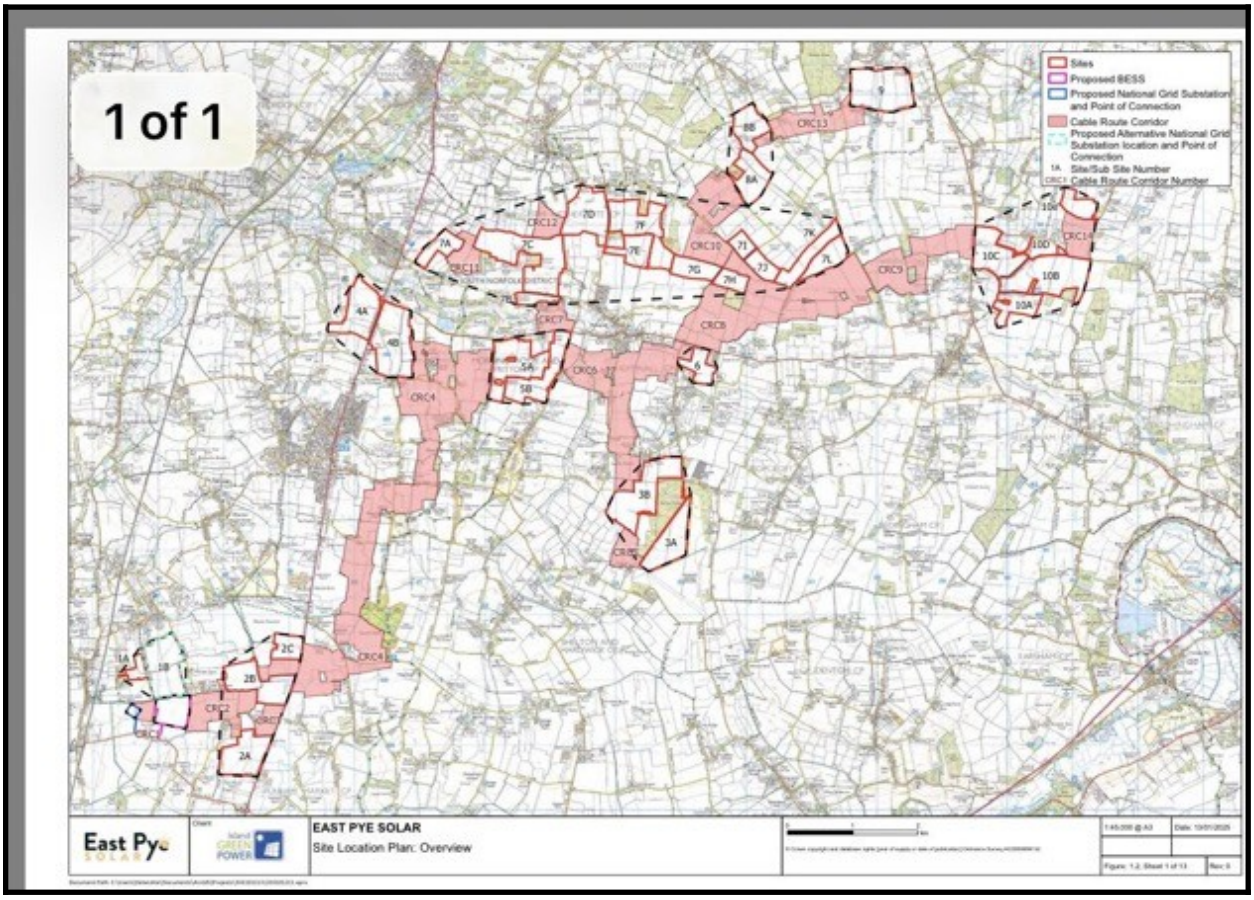
A Development Consent Order which depends on such assumptions is **not credible, not robust, and not capable of implementation**. The reliance on Land Parcel 7 therefore materially undermines the deliverability and viability of the East Pye Solar scheme as a whole.

Overall conclusion

Fails on multiple independent and compounding grounds, including:

- Direct harm to the Saxlingham Green and Saxlingham Nethergate Conservation Areas and listed buildings;
- **European Protected Species licensing failure** (barbastelle CSZ epicentre);
- **High-pressure gas infrastructure conflict**;
- European Protected Species and SSSI risk;
- Countryside Stewardship Scheme conflict
- unacceptably close to **residential area**;
- severance of multiple rural public footpaths and affecting **Boudicca Way**;
- and destruction of **publicly funded Countryside Stewardship habitats**.

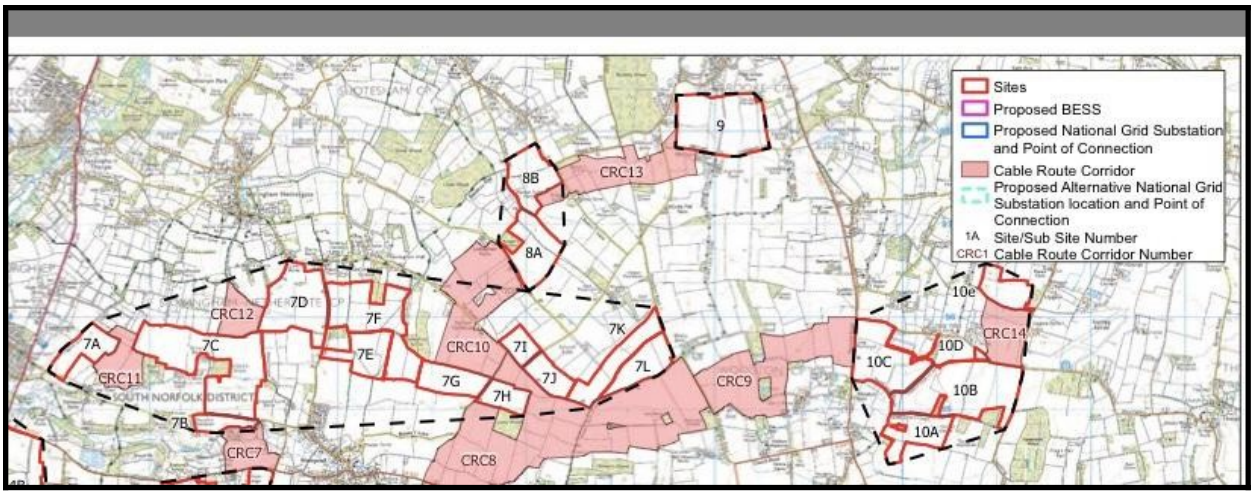
Chapter 1: Introduction



Site 7 is divided into 12 sub-plots labelled A-L and is the largest of all the sites at 328 hectares or 810 acres.

On its own, it is almost the same size as Cleve Hill Solar in Kent at 900 acres and the largest mega solar NSIP that has been built to date (2026).

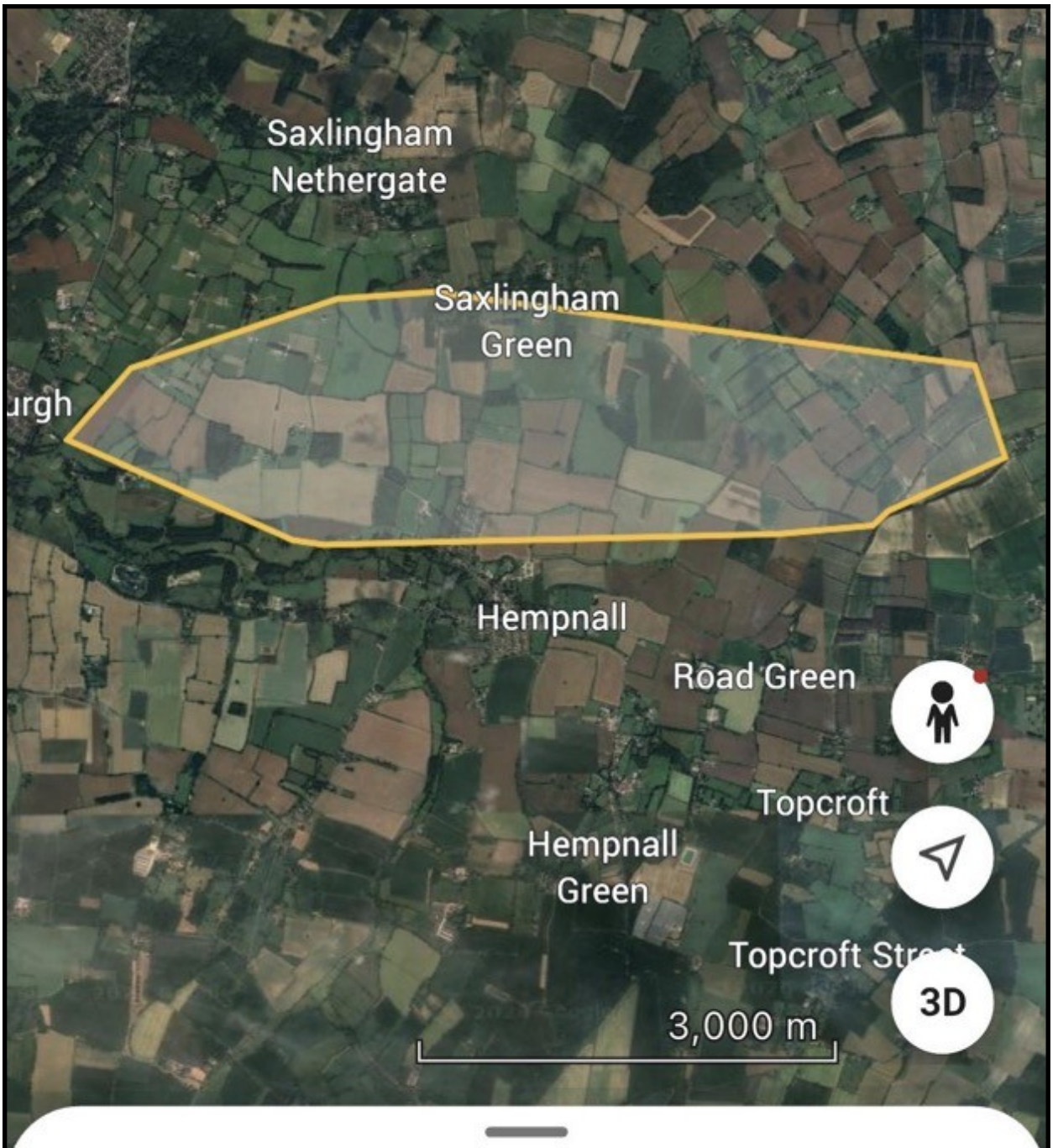
The boundary for Site 7 spans from Tasburgh in the west over to Woodton in the east, approximately 6.5km as the crow flies; and Hempnall in the south to Saxlingham Nethergate in the North, ~2km. Site 7 incorporates 5 parishes.



Site 7 Map with all Sub-plots A-L

However East Pye Solar's own **boundary perimeter of Site 7 is approximately 14.4km, with an internal area of 2140 acres.**

Although not all of this internal acreage is proposed for solar panels, access to sub-plots, haulage routes, construction traffic, noise, compounds, substations and cabling will affect the whole area contained within the Site 7 boundary line (see image below)



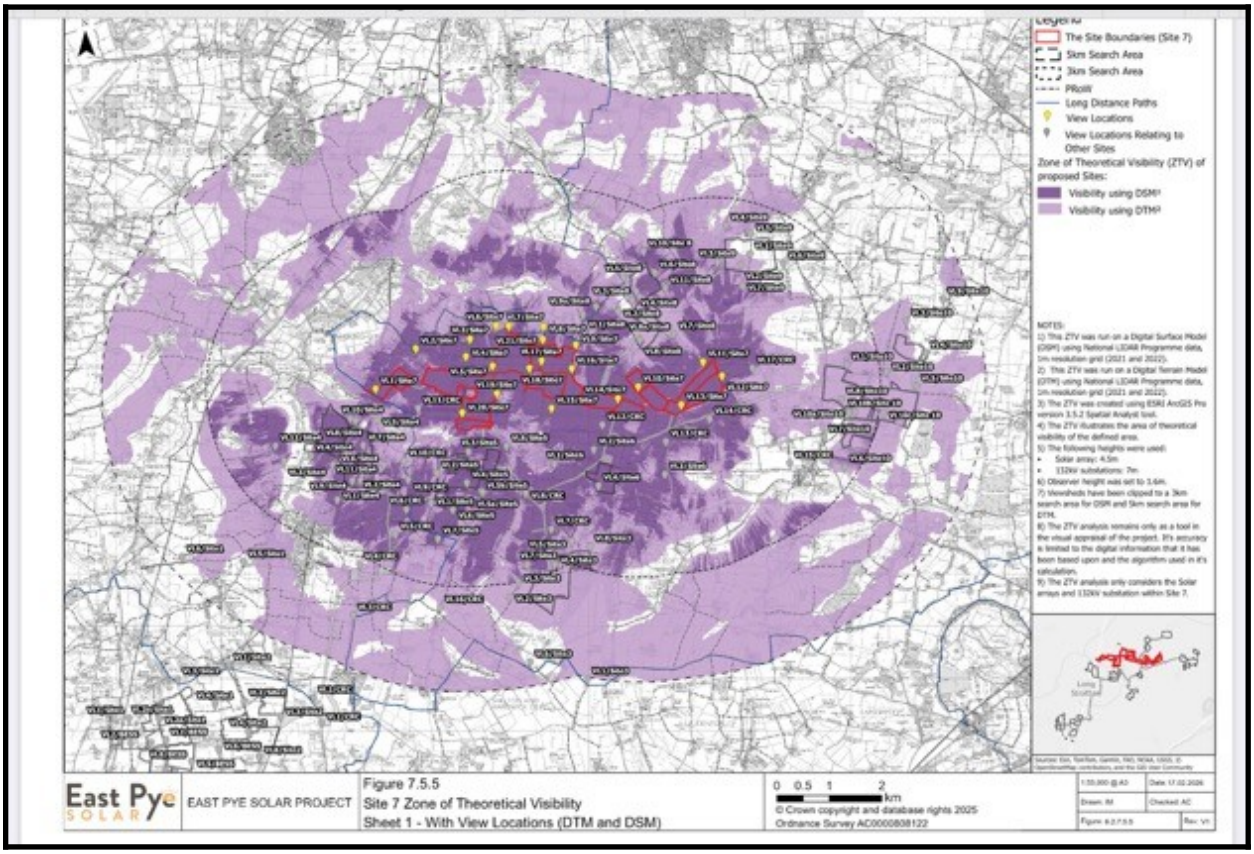
site 7

Perimeter

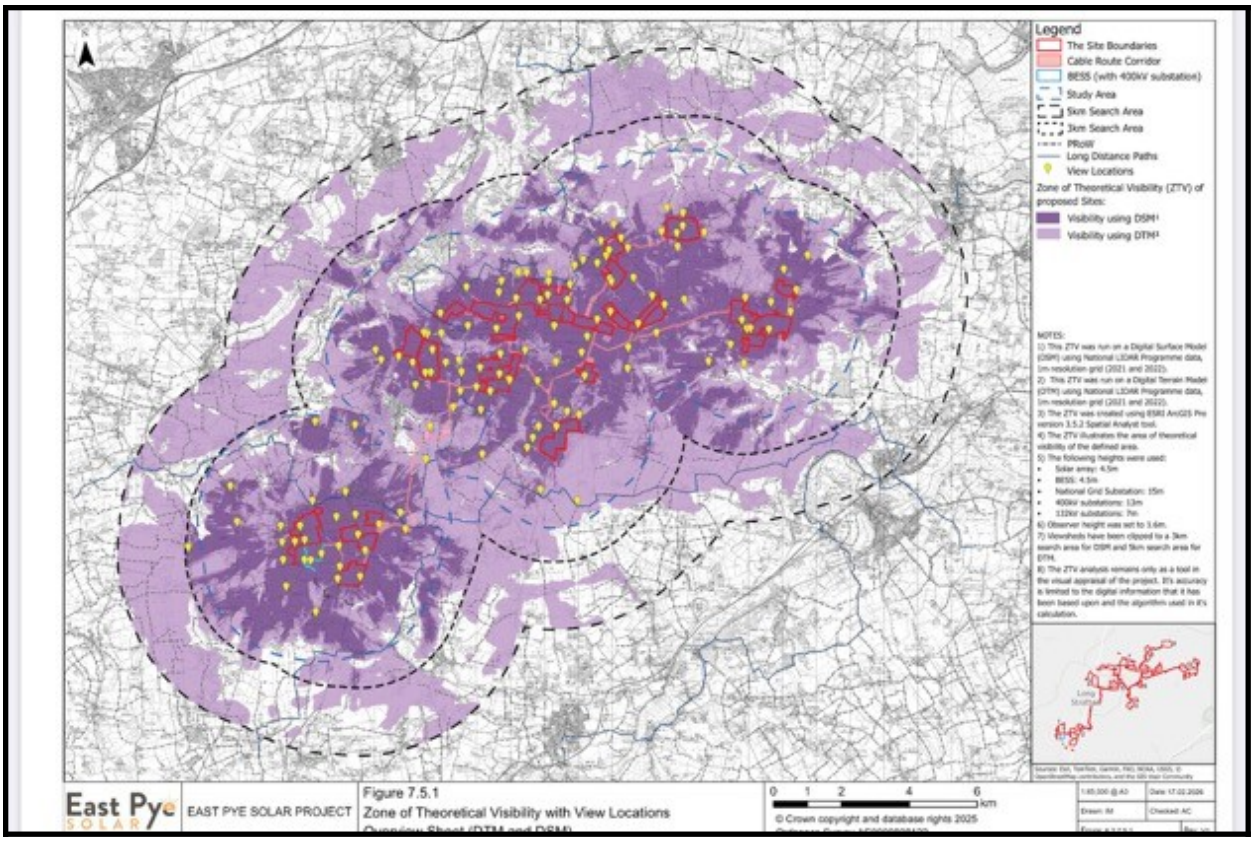
14.4 km

Perimeter of Site 7 and the vast area it covers

The devastation of the scheme will be seen across the full internal area and way beyond significantly at 3km radius and to 5km, although we know it doesn't just stop there (Zone of Visibility).



Site 7 East Pye Solar Zone of Visibility Overview

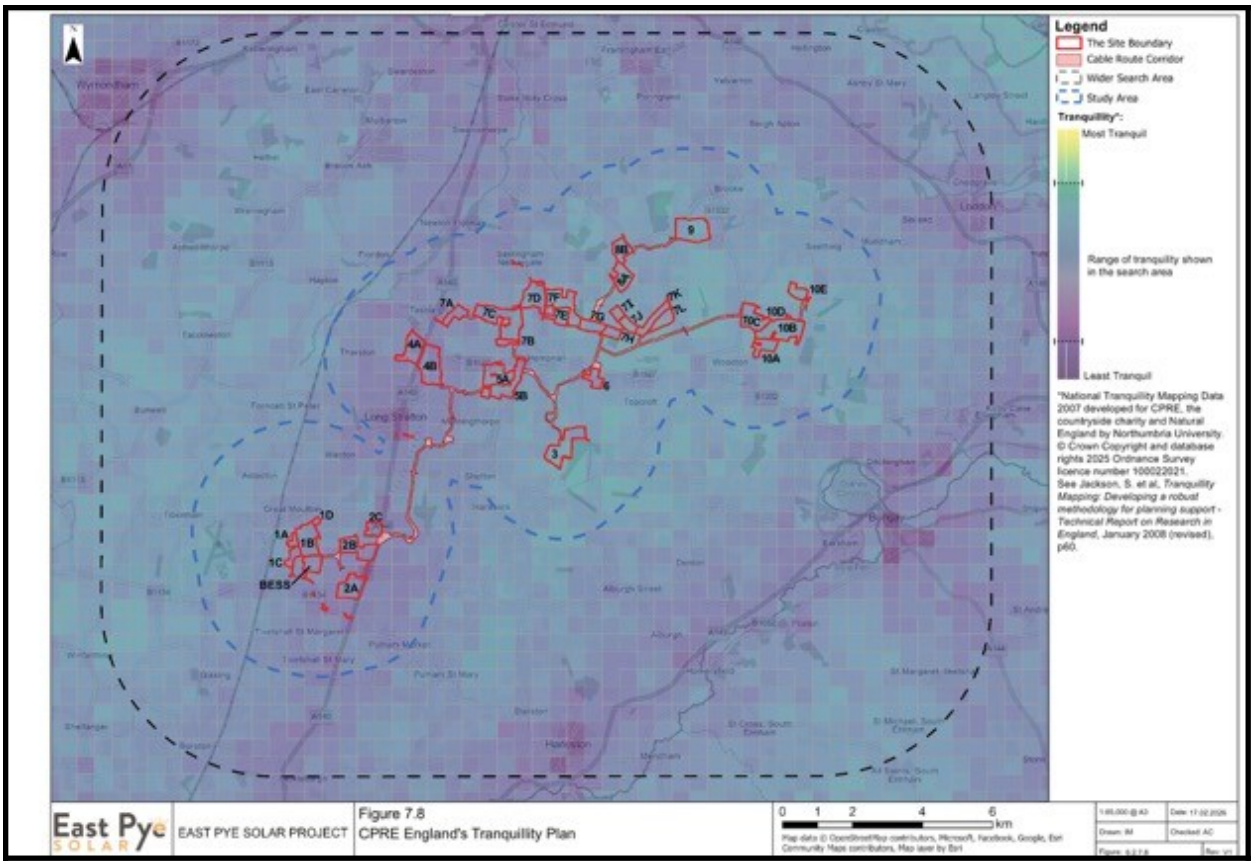


East Pye Solar Total Zone of Theoretical Visibility

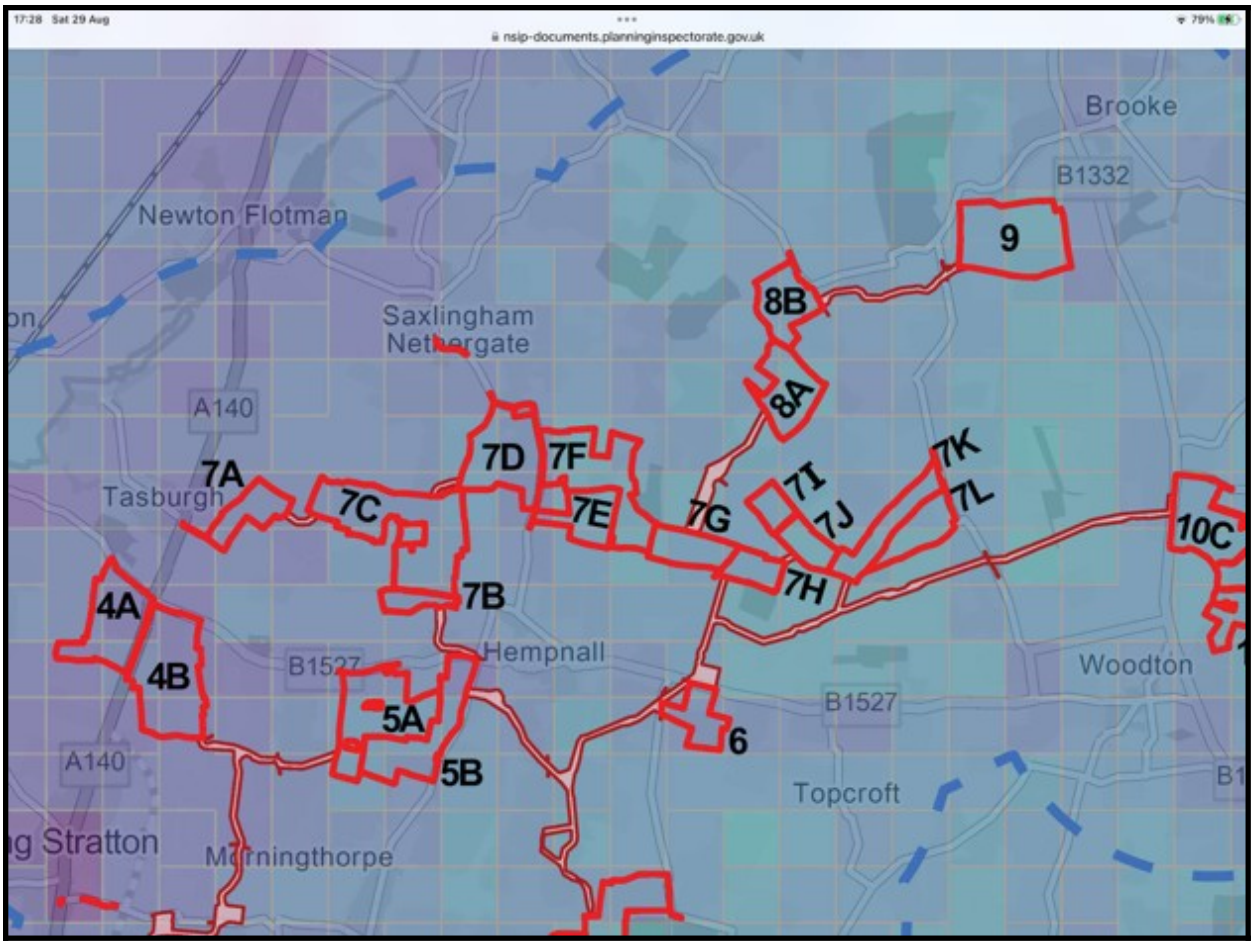
The fields left for farming won't be visible past the height and size of the panels and substation whilst the 'fields of grey' from the solar will visually detract away from the tranquility of green forest, meadows, river valley, yellow and gold crop-growing fields.

Area of Tranquility

The area covered by Site 7 is considered some of the most tranquil in the area (CPRE Tranquility Map) and is popular with walkers enjoying the PRoW, more serious hikers following the Boudicca Way, cyclists enjoying quiet and safe lanes, dog walkers, runners, tourists and local residents.



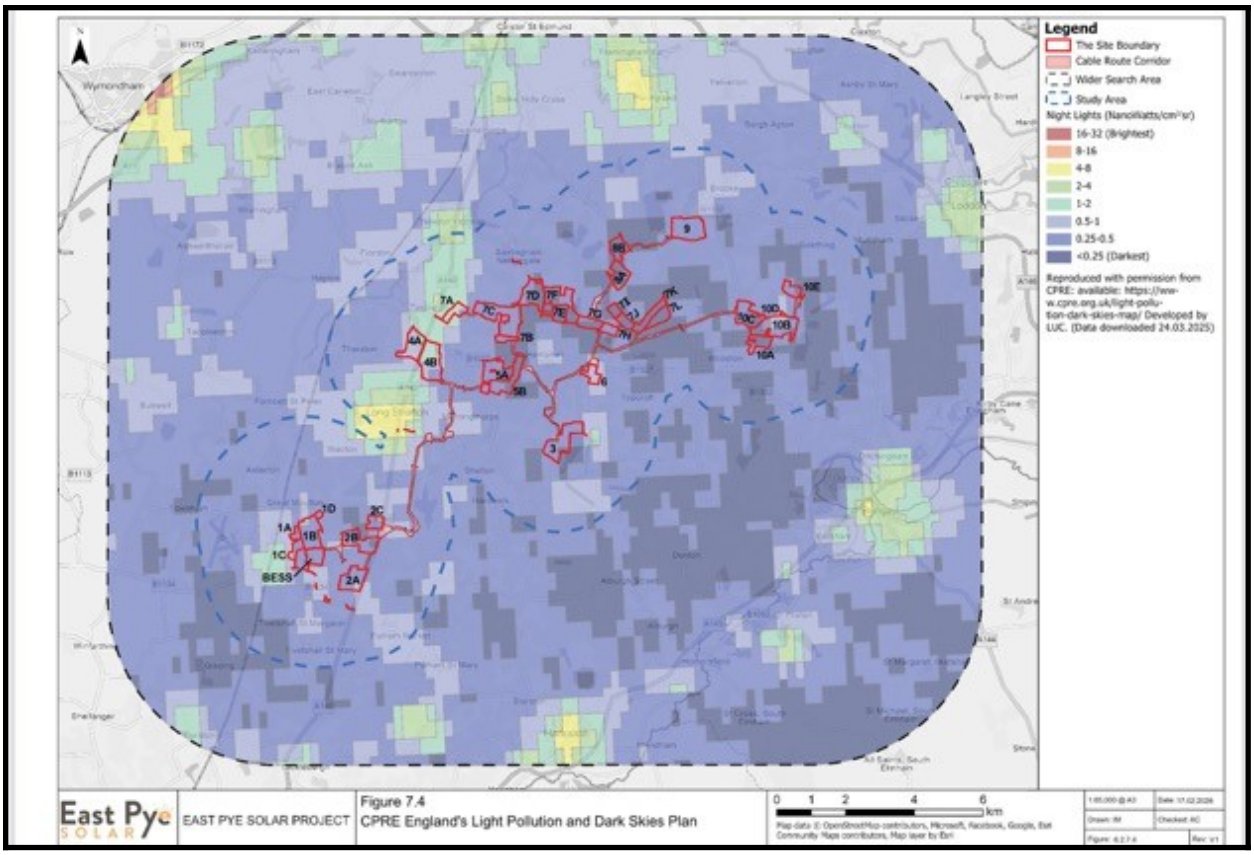
CPRE England's Tranquility Plan



Site 7, CPRE England's Tranquility Plan

Site 7 is also significant as part of the CPRE Light Pollution and Dark Skies Plan (image).

Many visitors come to Norfolks' to enjoy the 'big skies' the county is famous for whilst star gazers also come to the area hoping to view something special or to catch the Northern Lights that are often seen here.



CPRE England's Light Pollution and Dark Skies Plan

Dark Skies is important as it supports the nocturnal and protected wildlife, like the Barbestrelle bat listed as **vulnerable** in Great Britain and **Near Threatened on the IUCN Red List of Threatened Species**. The area is a significant safehold for breeding roosts, foraging and hunting and includes other bats including the Serotine bat also vulnerable.

Site 7 lies entirely within **overlapping Core Sustenance Zones (CSZs) for barbastelle bats** and directly adjoins **ancient woodland confirmed to support maternity colonies.**

Removing such sites will be detrimental to the vulnerable species and will require an Environmental Protective Species Licence.

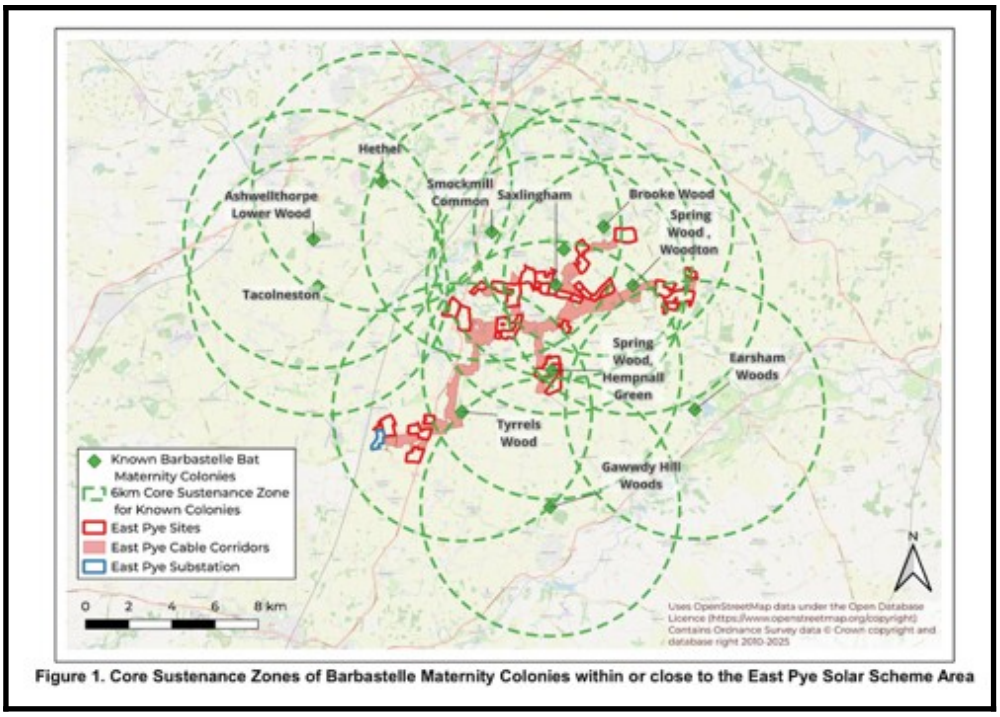


Figure 1. Core Sustenance Zones of Barbastelle Maternity Colonies within or close to the East Pye Solar Scheme Area

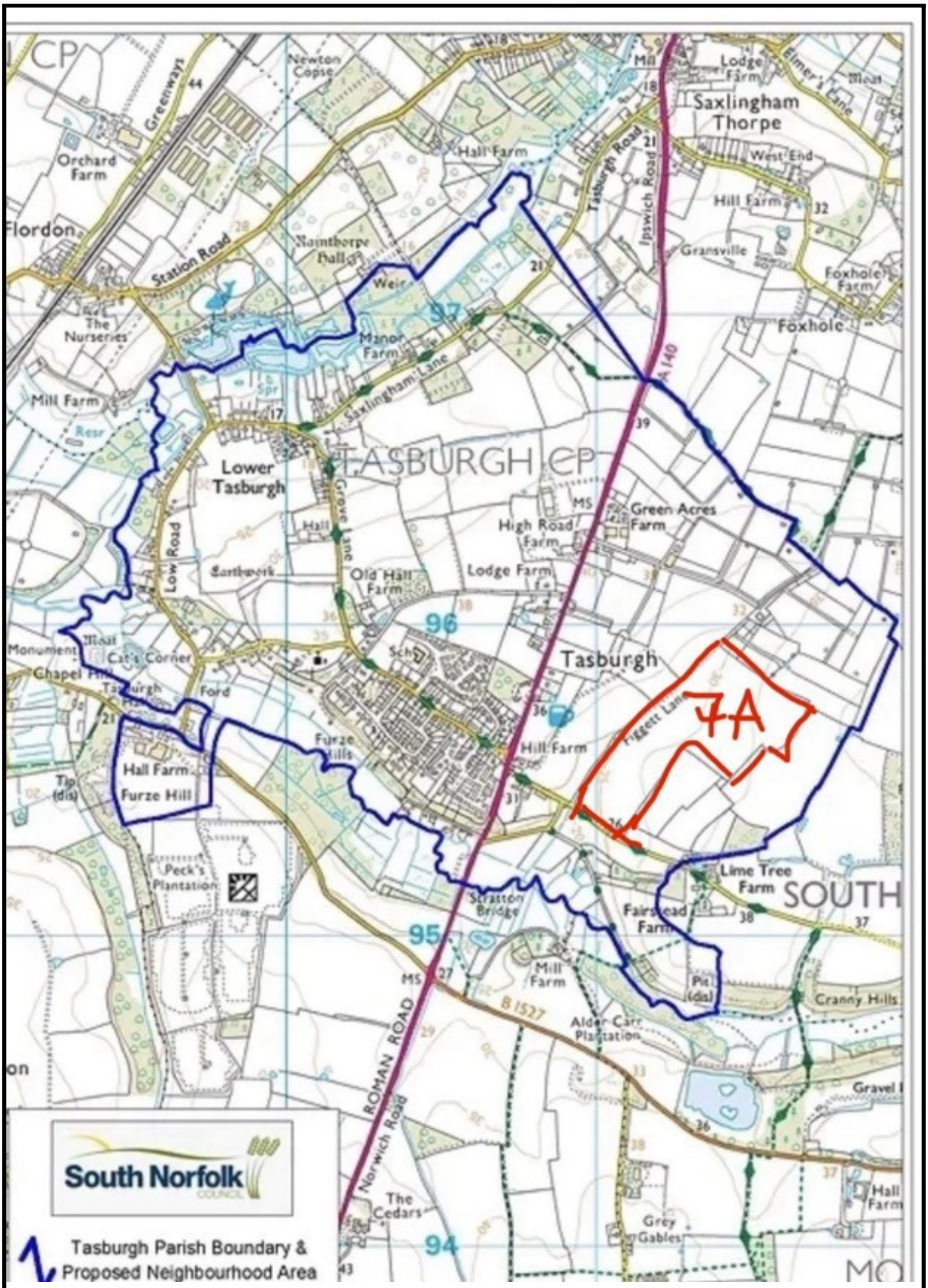
Although a lot of Site 7 is largely agricultural land there are multiple properties in and around this tranquil area; family farms, private homes, local businesses and farm shops.

Boudicca Way walking route and Rebellion Way cycle route travel through this area and will be significantly impacted by the development. Many walkers walk the Boudicca Way, a 58km waymarked route from Norwich to Diss, staying in local campsites and BnBs. The Diss to Norwich run 2025 followed the Boudicca Way route.

Site 7 is sited between, and within, five villages and parishes; Tasburgh, Hempnall, Saxlingham Nethergate, Shotesham and Woodton. All with significant heritage and history.

Tasburgh

The village is sited to the west of the A140 however incorporates sub-site 7A which is 19 hectares (47 acres) of mainly Grade 2 BMV agricultural land growing cereals.


Saxlingham Thorpe
Tasburgh CP
Lower Tasburgh
Tasburgh
Flordon
Hall Farm
Furze Hill
Manor Farm
Green Acres Farm
High Road Farm
Lodge Farm
Old Hall Farm
Lime Tree Farm
Foxhole
Cranny Hills
Alder Carr Plantation
Peck's Plantation
Mill Farm
Grey Gables
The Cedars
Saxlingham Lane
Grove Lane
Low Road
Ipswich Road
Tasburgh Road
Station Road
Norwich Road
ROMAN ROAD
A 140
B 1527
7A
South Norfolk
Tasburgh Parish Boundary & Proposed Neighbourhood Area

Tasburgh lies eight miles south of Norwich and just north of Long Stratton in South Norfolk. The name derives from the Old English meaning ‘Taesa’s fort’ and the River Tas that flows to the west and south of the village.

The parish has a long history and is detailed in the Domesday Book of 1086.

The earliest signs of human occupation are provided by prehistoric flint pot boilers located near the River Tas.

Tasburgh parish has a population of 1,102 people (2021 census) of 467 households.

The layout and geography can be divided into three areas:

- Upper Tasburgh sites near the A140 and features modern post-war housing developments built mainly from 1960s onwards;
- Lower Tasburgh rests down in the Tas Valley and keeps a quiet, rural look with 17th century timer framed farmhouses and cottages;
- River Tas flows nearby and gives the village its historic name.

Tasburgh History and Heritage:

- Hillfort features the remains of an ancient Iron Age and Middle Saxon hillfort earthwork enclosure;
- St Mary the Virgin is a traditional Norfolk church with a round flint tower located near the old fort site;
- Tasburgh Hall is a historic local country house located on the western edge of the parish.

The village enjoys a local pub, a sports and social club, an outdoor play area and a football pitch. The village hall hosts an outreach Post Office service and a Primary School is located within the village boundary.

Hempnall

Hempnall’s name is of Anglo-Saxon origin and derives from the Old English for Hemma’s nook of land and the parish includes five Sub-Sites:

7B - 9 hectares / 22 acres

7C - 75 hectares / 185 acres

7E - 23 hectares / 57 acres

7G - 21 hectares / 52 acres

7H - 14 hectares / 35 acres

Hemnall parish on Site 7 alone is proposed to support 142 hectares or 351 acres of Best and Most Versatile 1-3a agricultural land.

Named in the Domesday Book 1086, Hempnall is listed as a settlement of 57 households. According to the 2021 census, Hempnall now consists of a total population of 1238 people.

The parish covers an area of 5.72 sq miles

At the heart of the village is the Conservation Area with the Grade I listed St Margaret the Virgin place of worship dating to the 13th century. It still holds Sunday service every day.



St Margaret the Virgin, Hempnall

This active village has multiple amenities including the village hall; the hub of Hempnall and serves multiple sports and social clubs from badminton, yoga and pilates, a blood donation bank and the parish council. There is a substantial playing field with many children's facilities plus a tennis club with two floodlit courts and local football club. The convenience store houses the post office, the 'Hempnall Trust' village charity runs the Grade II listed Hempnall Mill, now a Centre offering a variety of services including a weekend community bar with weekly food trucks plus an older peoples lunch group and a room for hire, to name a few.

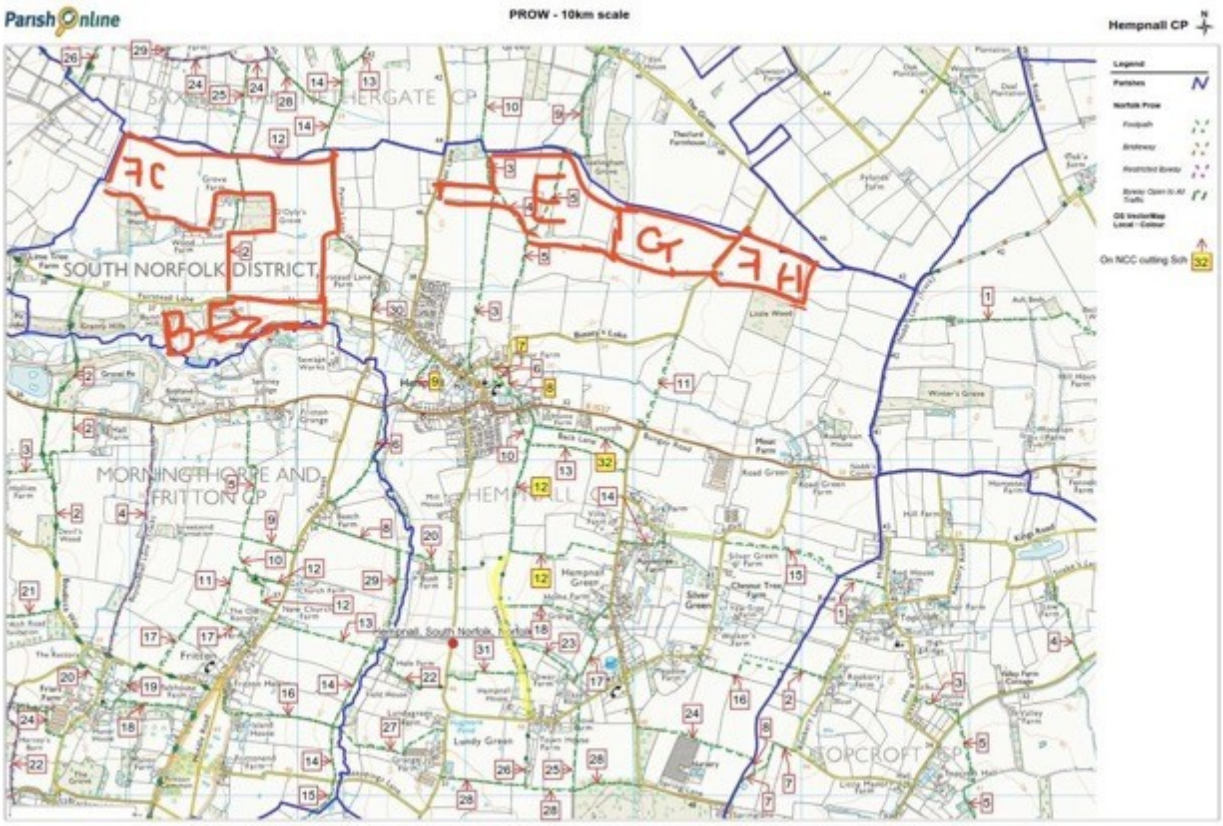


The Mill Centre, Hempnall

Hempnall War Memorial is a wheel-headed cross with plinth and rustic base located at the junction of Broaden Street and The Street with Fairstead Lane.



Hempnall War Memorial


Parish Online
PROW - 10km scale
Hempnall CP
SOUTH NORFOLK DISTRICT
MORNINGTHORPE AND FRITTON CP
HEMPNALL
STOPCROFT CP
Hempnall, South Norfolk
Legend
Parishes
Norfolk Prow
Footpath
Bridleway
Restricted Byway
Byway Open to All Traffic
OS VectorMap Local - Colour
On NCC cutting Sch
32
A
B
C
D
E
F
G
H

Saxlingham Nethergate is the northern area of Site 7 and includes sub-sites 7D and 7F of mainly BMV Grade 1-3a growing various cereals covering 95 hectares (234 acres).

The parish consists of two settlements and at one time was two parishes; Saxlingham Nethergate or lower parish, which includes Eastgate, now Saxlingham Green, and Saxlingham Thorpe (a settlement) which incorporates the hamlet of Foxhole.

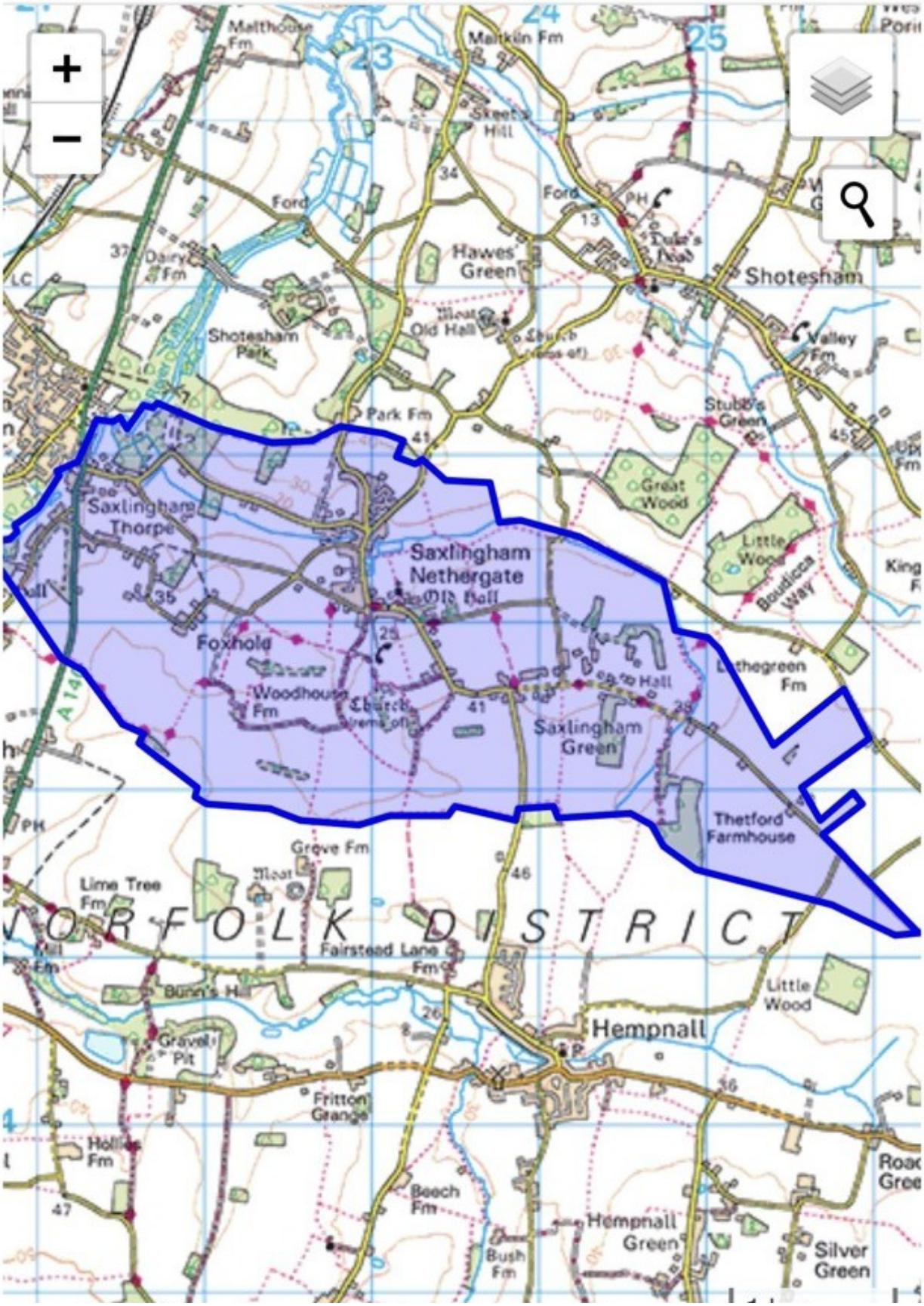
Despite the village appearing to be a Saxon settlement, flint tools have been found which imply Stone Age settlements and much later, Iron Age and Roman occupation is indicated by potsherds and coins as well as foundations of buildings being shown by changes in the colour of the vegetation.

Saxlingham means the settlement of Sax or Saxe which could be the name of a person or a tribe. It also implies the people carried a war axe known as a seaxe (fortunately not seen any more!)

Saxlingham Nethergate has a population of 732 people (2021 census) living in 295 households. The parish covers about 3.3 square miles with a Conservation Area at its centre with multiple listed heritage buildings and a Grade II listed War Memorial, which the residents are fiercely protective about.



Saxlingham Nethergate War Memorial


Malthouse Fm
Malkin Fm
Skeet's Hill
Ford
Ford
PH
Hawes' Green
Shotesham
Dairy Fm
Shotesham Park
Moat
Old Hall
Church (ruins of)
Valley Fm
Stubb's Green
Park Fm
Great Wood
Little Wood
Boudicca Way
Saxlingham Thorpe
Saxlingham Nethergate
Old Hall
Foxhold
Woodhouse Fm
Church (ruins of)
Saxlingham Green
Lethegreen Fm
Thetford Farmhouse
A140
Grove Fm
Lime Tree Fm
NORFOLK DISTRICT
Fairstead Lane Fm
Bunn's Hill
Gravel Pit
Hempnall
Little Wood
Fritton Grange
Holly Fm
Beech Fm
Hempnall Green
Bush Fm
Silver Green

Shotesham

A South Norfolk village approximately 5 miles south from Norwich in The Valley of the river Tas.

The parish covers an area of 5.60 sq mi and a population of 562 (227 households, 2011 census).

In local dialect, Shotesham is pronounces “Shottsum” with the emphasis placed on the vowel of the first syllable.

Shotesham was for many years the Norfolk seat of the D’Oyly family and of the D’Oyly baronets who also possessed Suffolk estates.

The country house and estate of Shotesham Park Grade I listed, is the seat of the Fellows family. Designed by Sir John Soane (1753 - 1837), an English architect who specialised in the Neo-Classical style, became a Professor at the Royal Academy and knighted in 1831.



Shotesham Park House, 1789

All Saints’ Church stands in the centre of the village, is from two distinct periods, with the medieval tower and nave whilst the chancel is from the early 20th century.

Our galaxy rising over All Saints, taken by Chris Dean, on Norfolk Country Photographs.



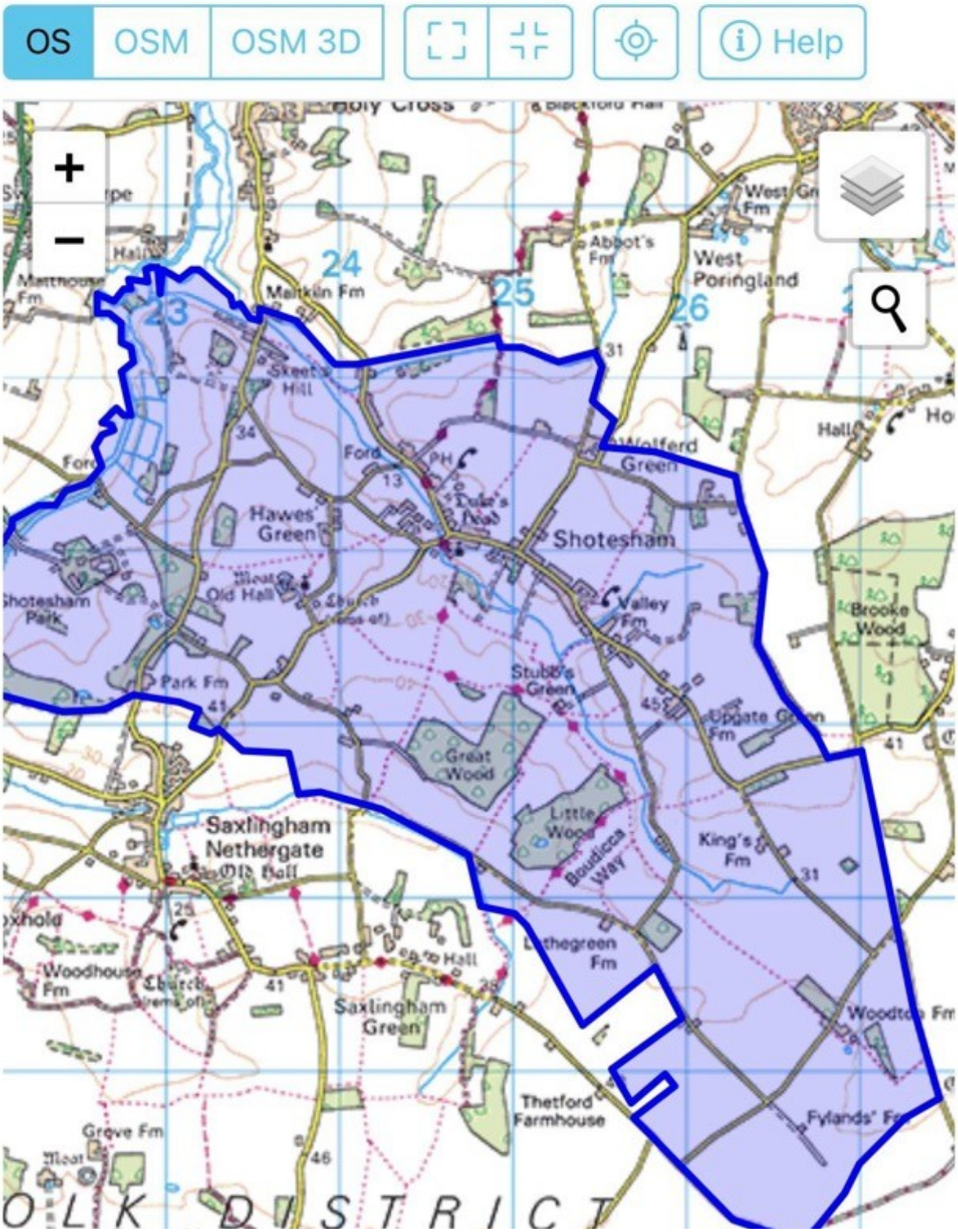
The parish will host three sub-sites totaling 50 hectares or 124 acres of BMV Grade 3 agricultural land.

7I - 10 hectares / 25 acres

7J - 14 hectares / 35 acres

7K - 26 hectares / 64 acres

Shotesham parish map




Search Google Earth
I
Stubb's Green
Saxlingham
Green

Woodton

Woodton is situated in the south of Norfolk, north of Bedlington nad Topcroft, east of Hempnall, west of Hedenham and south of Brooke and Kirkstead.

The name Woodton may derive from Old English meaning ‘settlement in the woods’.

The parish has a long history and was established by the time of the Normal Conquest. It’s population, land ownership and productive resources were detailed in the Domesday Book, 1086.

The earliest finds from Woodton date back Neolithic and Bronze Age from the 23rd century BC to 7th century BC.

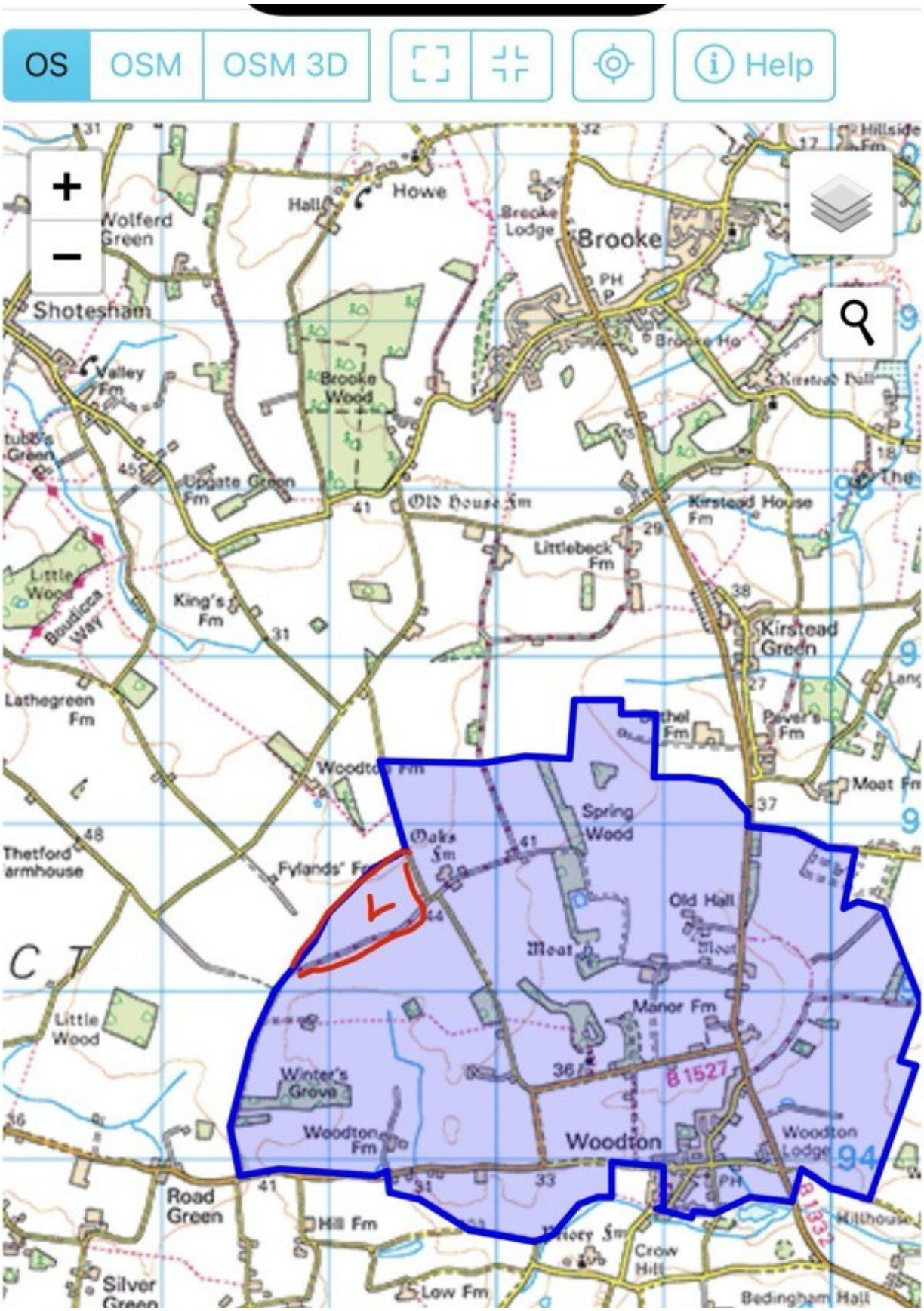
Medieval archaeology is more noticeable in the form of the All Saints’ Church which dates back to the 12th century and stands in a walled churchyard and is notable for its round tower.



All Saints Church

The parish of Woodton covers an area of 3.42 sq miles and a population of 702 and will host one Sub-site:

7L - 22 hectares / 54 acres


OS
OSM
OSM 3D
Help
Howe
Brooke
Shotesham
Wolferd Green
Brooke Wood
Kirstead Green
Littlebeck Fm
Kirstead House Fm
Old House Fm
Spring Wood
Oaks Fm
Old Hall
Manor Fm
Woodton
Woodton Fm
Winter's Grove
Road Green
Silver Green
Crow Hill
Low Fm
Bedingham Hall
Lathegreen Fm
Thetford
Little Wood
B1527

Area per Sub site and Soil Quality

Site Name	Area Hectares	Area Acre	BMV Soil Quality
7A Tasburgh	19	47	Mainly Grade 2
7B Hempnall	9	22	Grade 4
7C Hempnall	75	185	Grade 2
7D Saxlingham Nethergate	44	108	Grade 2-3b
7E Hempnall	23	57	mainly Grade 2
7F Saxlingham Nethergate	51	126	Grade 2-3a
7G Hempnall	21	52	Grade 3a
7H Hempnall	14	35	Grade 3a
7I Shotesham	10	25	Grade 3b
7J Shotesham	14	35	Grade 3b
7K Shotesham	26	64	Grade 3a
7L Woodton	22	54	Grade 3a

Chapter 2: Environmental Impact Assessment Methodology and Flaws

East Pye Solar state in their Site Selection Assessment document APP/7.20, when considering the site selection process, they had several constraints and preferences:

- **Utilise** previously developed land, brownfield land, contaminated land, or industrial land;
- **Avoid** agricultural land or if unavoidable to use land that is not classified as BMV (1,2,3a) so looking at land that is 3b and 4;

- **Avoid** land in Flood Zone 2 and 3;
- **Avoid** land designated as Site of Special Scientific Importance (SSSI) as well as ancient and non-ancient woodland;
- **Avoid** any Scheduled Monuments, Registered Battlefields, dense concentration of listed buildings and Conservation Areas;
- **Avoid** area to the proximity of nearby sensitive human receptors (high sensitivity) which include residential dwellings, populated areas and villages.

What they have done:

- **No land** is brownfield, previously developed, contaminated or industrial;
- **Around 80% of solar sites are BMV grade 1-3a including Site 7 which is mainly a mixture of BMV Grade 2 and 3a;**
- Some of Site 7 is in **Flood zone 3 with the rest in Flood Zone 2 (magic map);**
- The majority of **site 7 is designated Medium to High groundwater flooding** and with some of **Site 7 in High Priority Flood Risk Management in sections;**
- The whole area is part of **Natural England's National Character Area 83, South Norfolk and High Suffolk Claylands** with 25 years planned restoration and regeneration in place;
- Cable Route Corridor (CRC) and internal proposed haul road passes through the Claylands, significant to regeneration of character and wildlife protection, as well as adjacent to **several ancient and non-ancient woodland** areas;
- **Site 7 sits with the five parishes** of Tasburgh, Hempnall, Saxlingham Nethergate, Shotesham and Woodton with their **Conservation Areas** within a few hundred metres of some sites;
- Transport routes for Site 7 includes manoeuvring the narrow lanes of Saxlingham Nethergate, and Hempnall including through the Conservation Areas as well as impacting major transport routes of the A140, Hempnall roundabout and narrow or singletrack lanes like Fairstead Lane and the Krons not built for more than a car and a tractor;
- The villages impacted by Site 7 are areas of **dense concentration of listed buildings** and some sub-sites are in close proximity to many listed buildings Grade I, Grade II* and Grade II;
- Planned transport routes in some cases of High Sensitivity, in particular on Broaden Lane where it goes past Hempnall Primary School and Saxlingham Nethergate Primary School.

In fact the cumulative scheme is near, around or adjacent to multiple villages, near dwellings and multiple listed buildings, ancient woodland, SSSI and Conservation areas.

A Scheme should be made to fit a landscape not a landscape be made to fit a Scheme.

This alone demonstrates the proposed scheme is too big and in the wrong place. That cannot be mitigated against.

The scheme is driven by willing landowner sites only which isn't a good enough reason to remove BMV from production nor decimate and change the character of the area forever.

Soil and Agriculture

With around 80% of the solar sites being BMV Grade 1-3a and no soil surveys have been taken on the CRC but assumed to also be BMV1-3a, **justification of using BMV under National Planning Policy Framework (NPPF) should be made.**

The scheme is landowner driven rather than scheme driven.

Within the **Botley West DCO** review, the Secretary of State (SOS) requests *'to secure the* ***restoration of BMVL to at least their pre-construction agricultural land classification grade upon decommissioning.*** *Appropriate monitoring to aid the soil restoration should also be outlined in the Soil Management Plan.*

The SOS requested justification as to the siting of the scheme on BMVL and how the alternatives or avoiding BMVL altogether have been considered during site selection.'

East Pye Solar have not justified the use of BMV at all and in particular land categorised as BMV 1-3a.

The same requirements for Botley West should be applied to East Pye Solar who have actively sought agricultural land instead of alternatives.

If suitable alternatives couldn't be found, shouldn't the scheme in this area be considered too big and the wrong place?

Access and Transport

Some transport surveys were carried out in April - May 2025, others 'in September' as a neutral month although a key tourist time for Norfolk (although the year wasn't stipulated) and others in November. None have been updated after the Long Stratton by-pass was completed.

- Access/transport routes assessed by desk top;
- **The A140 south - B1527 requires further assessment as the cumulative schemes accessing Sites 2A, 2B, 2C, CRC3 and CRC4 exceeds the IEMA EATM guideline thresholds of more than 10% flow increase on links with receptors of High Sensitivity.**
- This flaw affects Site 7 as much of the haulage will be held at Site 4A before called on to Sub-site 7A-F impacting the Hempnall roundabout and causing congestion and road user risk. It could also mean transport routes will again be amended and therefore consulted on;
- As the A140 is a major haul road and the main access route to most of the scheme this is a major flaw and demonstrates lack of in-depth transport surveys were taken;
- Different transport studies were taken with different results making understanding of the results challenging at best and generally incomprehensible and skewed;
- Knowing the roads in question, the results are highly questionable as the single track lanes aren't suitable for HGVs but will serve a delivery van and farm traffic;

- **HGV count includes vehicles over 3.5 tonne fabricating the results.** These will include delivery vans, work vans, Supermarket vans, ambulances, flatbed trucks, horseboxes, farming vehicles, buses, mini buses, motorhomes, towed caravans to name a few. Rarely it will include a HGV therefore the actual HGV increase rate will be far greater;
- **Site 4A will act as a holding point for haulage to be called on to 7A-7F;**
- **Access to Site 4A at A19 will be via from a newly created 5th exit off the A140** 4-exit Hempnall roundabout that serves over 20,000 vehicles a day;
- Built in 2019 due to the junction being an **accident 'hot spot',** it is a major haul route on the A140 north to south as well as east to west as a connecting route to market towns;
- Norfolk County Council refused access to Sites from A-roads yet and anything less than a B-road. This access point is not just from an A-road but also a **major junction on the A140**;
- **A19 accesses a major construction Compound and haulage holding site for 7A-7F** which will cause further congestion at the roundabout;
- Access to the haul road for Site 7 is from a C-road;
- With many local lanes closed with the bypass construction, all residents east of Long Stratton had to use B1527 west of The Street, Fritton/the Krons crossroads to the Hempnall roundabout making the figures for B1527 higher than normal. This has not been taken into consideration nor has surveys been repeated since the by-pass opened;
- Many lanes and access points haven't been surveyed including the junction with Brick Kiln Lane and B1527 which will serve haulage to site 4B, Site 5A and Site 5B as well as Sub-site 7A-7F;
- Visibility splay at access points cannot be achieved without removing significant habitat like wooded areas and hedgerows;
- **Many maps on the EPS documents are incorrect** as they **exclude the Long Stratton by-pass and changes to local road networks,** including the Streets Plan dated 3/4/2026 (see image below);
- A 7.5m wide CRC haul road is planned for HGV traffic across Site 7 without sufficient Ground Surveys to access suitable land;
- A haul road is planned to go across sub-site 7F and will move across a National Gas Transmission Pipe without considering the buffer zone around it and the risk it entails;
- **National Gas Transmission have objected to the scheme** due to lack of communication. That demonstrates lack of integrity and professionalism.
- The transport route to haulage route 7A-7F is via the Krons, a lane not meant for heavy haulage and no assessment has been made of the brick bridge over the Hempnall Beck (described as insignificant). East Pye Solar report that no weight limit signs are visible



The Krons bridge over the Hempnall Beck (river Tas tributary)



The Krons



The Krons

The ES: Chapter 11 - Transport and Access APP/6.1.11 shows traffic flow across key survey points in the scheme yet the table 11.10 ACT Baseline Traffic Flows show deviating figures between 18hrs and 24hrs whereby the 24hr flow rate is less than the 18hr.

Obviously either the results are flawed or the table **is poorly explained.**

The document does **not**, immediately alongside Table 11.10, give a sufficiently clear explanation of **how the 18-hour AAWT figures were calculated from the 24-hour ATC data**, or why the 18-hour statistic can exceed the 24-hour AADT.

That makes the presentation potentially confusing, particularly because a reader could reasonably interpret the headings as:

“vehicles counted in 18 hours” versus “vehicles counted in 24 hours.”

If that were the intended meaning, the figures would indeed be impossible.

Instead, they appear to be **different traffic-flow metrics**, not simple 18-hour and 24-hour counts.

There is another significant point

Notice what happens with the HGV figures:

A140 (N-B1527):

- 18-hour HGVs: **3,441**
- 24-hour HGVs: **2,792**

That is a difference of **649 HGVs**, or about **23%**.

So this isn’t simply a rounding issue. The same systematic relationship appears across the table.

East Pye Solar/Stantec need to provide the calculation methodology and underlying ATC data for Table 11.10.

In particular, explain:

1. What exactly **AAWT (18-hour)** means in this table.
2. What hours constitute the 18-hour period.
3. How the 18-hour AAWT has been calculated from the seven-day ATC data.
4. Why an 18-hour AAWT can be higher than the 24-hour AADT.
5. Whether the 18-hour and 24-hour figures have been derived from **the same survey data and same averaging period**.
6. Whether any **DfT conversion factors, seasonal factors, weekday factors or other adjustments** have been applied to either figure.

The ES states that Table 11.10 provides the baseline traffic flows on which the subsequent transport assessment is based, so understanding how these numbers were produced matters.

Cable Route Corridor Surveys

In December 2025, during the meeting with the Planning Inspectorate, and documented on 5th February 2026, East Pye Solar was advised to consider undertaking Agricultural Land Surveys (ALS) on the cable route corridor (CRC) referencing 'Oaklands Farm Solar Park' whereby Natural England raised concerns about the assumptions on land quality in that case and requested an ALS survey to be undertaken on the CRC during the examination.

The Inspectorate also advised the applicant to ensure relevant surveys were completed in time.

No surveys have been carried out on the Cable Route Corridor (CRC) for ALS.

In fact throughout the documents the Applicant still refers to **the need for 'detailed design' at a later stage** when discussing the CRC. How can this be assessed as to what to expect if it is still unclear of the detailed design that hasn't been finalised and surveys not undertaken?

So much of the CRC is incomplete as the land, access and route hasn't been surveyed and there are multiple inaccuracies including the nearest properties across the scheme.

Unregistered / Unknown Land Ownership and Book of Reference

- Section 56 notices were issued during 2025 and letters were sent to multiple residents asking about financial information causing worry, fear and stress including those in their 90s;
- Section 56 notices then began to appear again across the scheme from early May 2026, a week after the Planning Inspectorate registration opened and up until early June, less than 10 days before the close of Planning Inspectorate registration. New notices in Saxlingham Nethergate were posted on 30th May 2026;
- Many notices were posted several miles away from the relevant area and included up to 20 notices at a time;
- At least two homes were listed on posts under section 56 as 'unregistered' and these notices were posted considerable distance from the properties listed and owners were unaware;
- Ivy Cottage, Hempnall was listed on a post 3 miles away and the owners were notified by friends;
- The homes, as well as many others, are listed within the Book of Reference yet the owners were unaware;
- Martin Jenkins, the owner of Purbeck, Long Stratton has submitted his opinion on the Relevant Representation after being told by a neighbour that his home and garden was listed on a post 500m down a lane from his home;
- East Pye Solar told the owner of Purbeck, Long Stratton that they had written to them yet that is untrue. It's the same case for many people listed in the Book of Reference;

- East Pye Solar told the owner of Purbeck that their property was not in the public domain and yet is listed, not just on a post 500m away down a lane they wouldn't have accessed, but also they are listed within the Book of Reference. Both in the public domain;
- Purbeck is an example of property listed as 'unregistered/unknown' yet they are within the Book of Reference with full names and address of interested parties as well as of course EPS stating they had been written to;
- Many Section 56 signs appearing during the registration period were extended areas or different from the DCO. Some areas have not been included within the DCO;
- Many Section 56 signs are unidentifiable locations and could be anywhere;
- Many Section 56 notices were removed, some deliberately and found as litter blowing in a verge, whilst others were removed including the posts and not replaced when requested.
- 1st June 2026 Land notices erected since East Pye submitted their proposal Saxlingham Nethergate;

- Notices have been erected across the whole site several weeks after the submitted proposal. Saxlingham Nethergate is subject to at least 20 new notices. Some of these impact directly on people's homes. There has been no public consultation;

- an increased land take on The Street/Church Hill including the War Memorial and up to the school;
- a comparatively large and new take to include the house "Pisces". It is not immediately clear why this land is required. The owner should be informed in case he has not been approached by the Applicant;
- A larger land take around the corner opposite Low Farm Cottages.

Within the Botley West response, the Secretary of State notes that a large number of plots identified as unregistered/unknown land ownership are within the Book of Reference where it has not been possible for the Applicant to identify ownership. The applicant has been requested to provide details of the diligent inquiries undertaken and to establish the ownership of the plots and provide an update on whether ownership has been identified. The applicant is also requested to update the Book of Reference.

Based on the evidence that homes and land parcels are being posted miles away from relevant plots, it would appear that East Pye Solar has not been diligent enough and the same should be expected of them as it is of **Botley West.**



This plot has not formed part of the consultation and is not part of the DCO

SECTION 56 PLANNING ACT 2008

East Pye SOLAR

NOTICE OF ACCEPTANCE OF AN APPLICATION FOR A DEVELOPMENT CONSENT ORDER (DCO) BY THE PLANNING INSPECTORATE (ON BEHALF OF THE SECRETARY OF STATE) UNDER SECTION 56 OF THE PLANNING ACT 2008

East Pye Solar

IMPORTANT NOTICE FOR PERSONS WITH AN INTEREST IN THIS LAND ATTACHED

TO: **The owners, lessees, tenants and any occupiers of this land and the subsoil of this land comprising the area of land shown shaded blue on the below plan and anyone with an interest in it or with the power to sell, convey or release it or people who could have a relevant claim as a result of the East Pye Solar project going ahead.**

Notice Reference: Unregistered240



This Plot was not part of the consultation and not part of the DCO

TO: ...ONS WITH AN INTEREST IN THIS LAND ATTACHED

The owners, lessees, tenants and any occupiers of this land and the subsoil of this land comprising the area of land shown shaded blue on the below plan and anyone with an interest in it or with the power to sell, convey or release it or people who could have a relevant claim as a result of the East Pye Solar project going ahead.

Notice Reference: Unregistered1076



This plot could be anywhere

East Pye SOLAR

SECTION 56 PLANNING ACT 2008

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Notice Reference: Unregistered233



This plot was not part of the consultation and not part of the DCO

East Pye SOLAR

SECTION 56 PLANNING ACT 2008

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Notice Reference: Unregistered645



This plot was not part of the consultation nor is within the DCO

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Notice Reference: Unregistered257



This plot is larger than the DCO

- 

This is the same area on The Street Plan

East Pye
SOLAR

SECTION 56 PLANNING ACT 2008

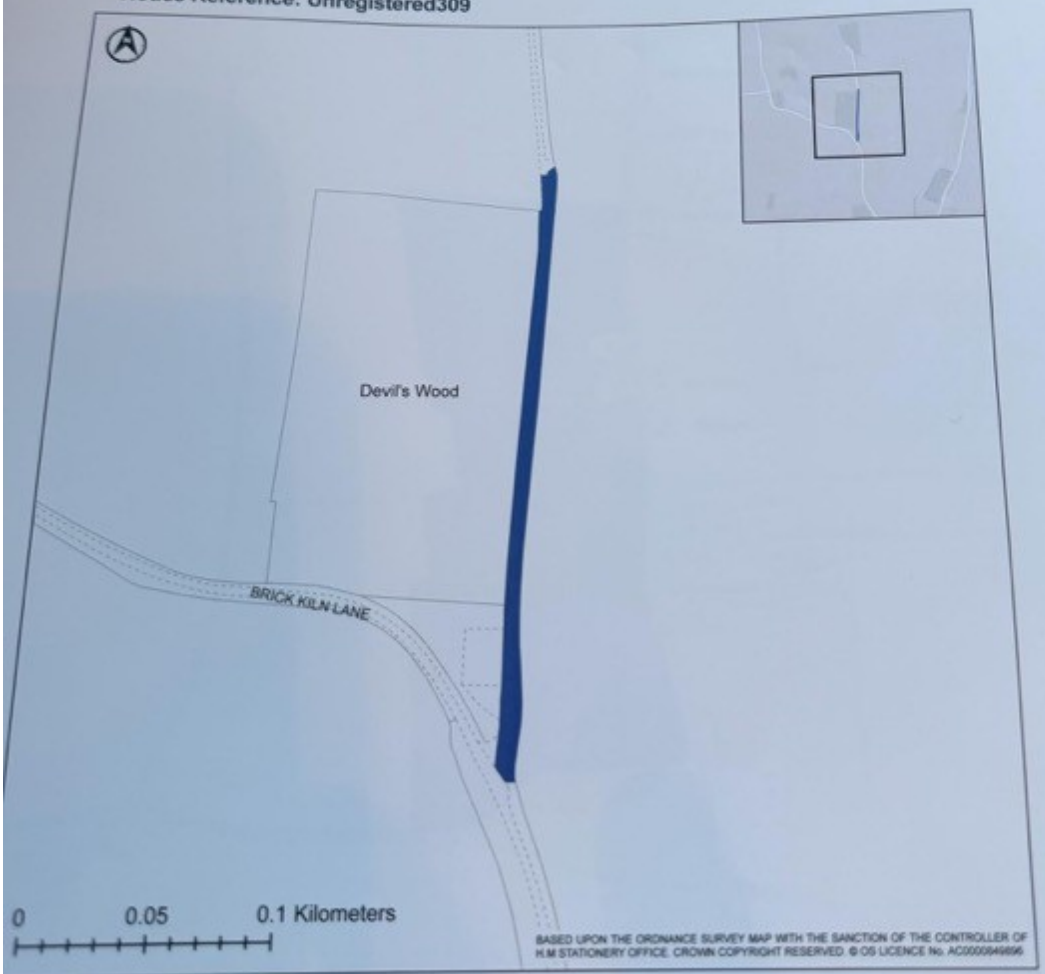
NOTICE OF ACCEPTANCE OF AN APPLICATION FOR A DEVELOPMENT CONSENT ORDER (DCO) BY THE PLANNING INSPECTORATE (ON BEHALF OF THE SECRETARY OF STATE) UNDER SECTION 56 OF THE PLANNING ACT 2008

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Notice Reference: Unregistered309



This plot is larger than the DCO

East Pye

SECTION 56 PLANNING ACT 2008

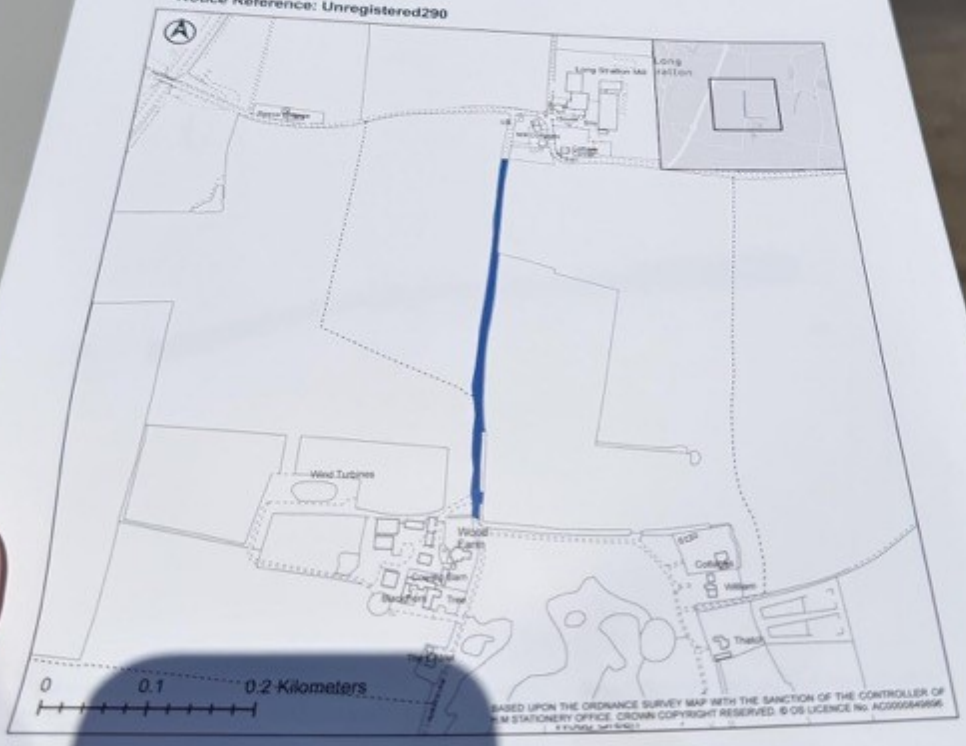
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East Pye Solar

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Notice Reference: Unregistered290



BASED UPON THE ORDNANCE SURVEY MAP WITH THE SANCTION OF THE CONTROLLER OF HM STATIONERY OFFICE. CROWN COPYRIGHT RESERVED. © OS LICENCE No. AC0000849956

This Plot is larger than the DCO

East Pye
SOLAR

SECTION 56 PLANNING ACT 2008

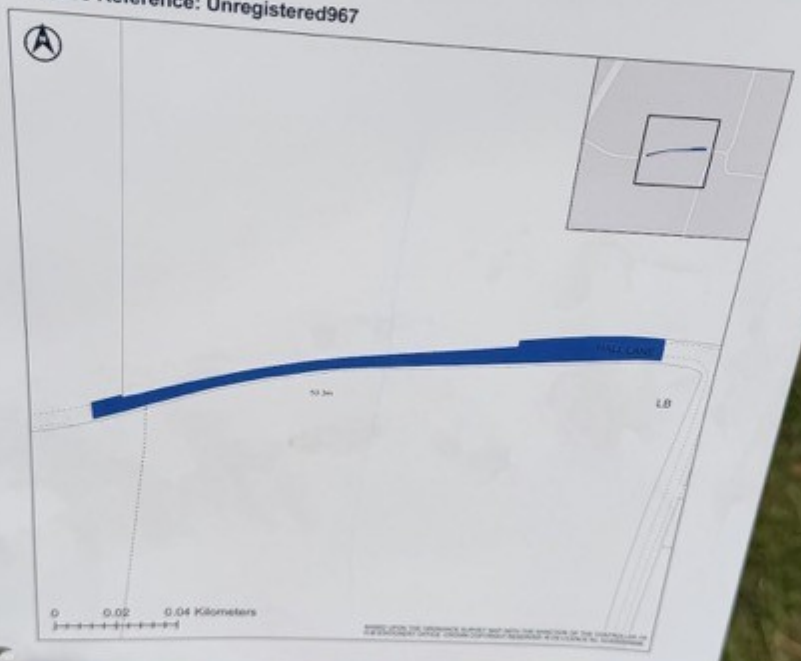
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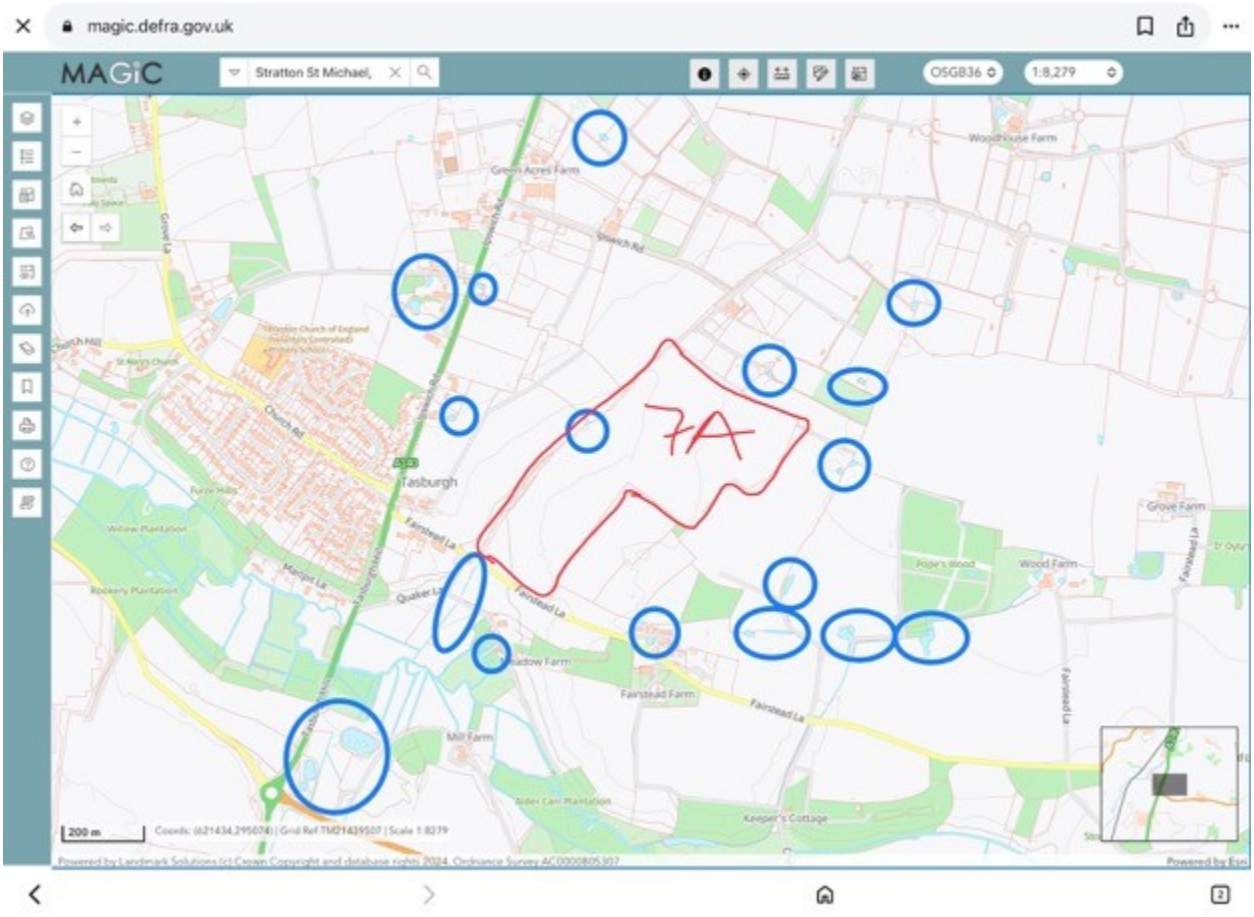
Notice Reference: Unregistered967



This plot could be anywhere however I know where this is (Mill Road, Long Stratton) and it is larger than the DCO

Great Crested Newts (GCN)

- **Natural England** will only accept survey results carried out within the optimum survey period between **mid April to the end of June;**
- **From Natural England,** 'a survey for Great Crested Newts should be conducted where there's a suitable water body such as a pond or ditch within **500 metres** (m) of the development, even if it only holds water for some of the year' Gov.uk;
- Great Crested Newts have been located on multiple ponds and water areas on Site 7 and across CRC based on data records since 2006 up and until 2023 EPS Environmental Study Vol3; App 8.3 March 2026;
- East Pye Solar stated Surveys were to be carried out June 2024 and June 2025 on other ponds and water areas on sites;
- Further surveys were carried out on a 250m buffer zone and are dated towards the end of June (at the end of the optimum survey time) also into July, August and September;
- GCN were found to be on ponds and water areas within Site 7 and within the 250m buffer zone of Site 7;
- No surveys were carried out on ponds on CRC as ponds were not present on the online mapping and only discovered during CRC extended habitat surveys undertaken in late 2025 and therefore status is unknown but precautionary assumption is made. There are GCN on most ponds across the CRC;
- Some results were 'precautionary positive' due to no access or ponds were dry. Surveys on fields during key harvest times and during summer months, especially in June 2025 when the county had been in drought for months, is no surprise;
- Many local ponds have not been surveyed for Great Crested Newts by which there are breeding colonies;
- **Many natural habitats will be removed or disturbed, like significant hedgerows and foraging habitat, during construction;**
- The GCN population is considered important at a local level;
- Absence of a record labelled as 'inconclusive' does not mean there are no Great Crested Newts. It could mean there is no survey data available for that location or data could not be gained;



Map shows water areas in the immediate vicinity to Site 7A

eDNA Survey Season

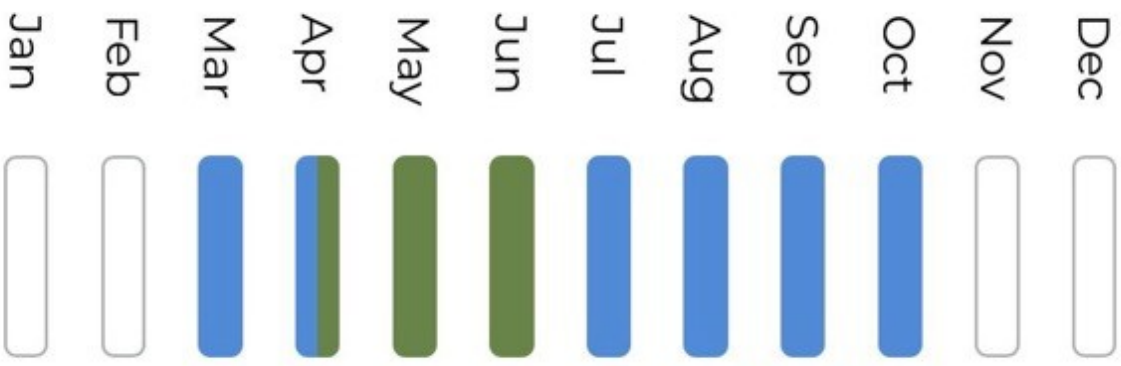
Optimal survey period =

Sub-optimal survey period =

Great Crested Newt



Results for great crested newt eDNA surveys are only accepted by Natural England if the samples were collected between April 15th and June 30th, however, we can analyse samples taken all year round for other applications.



Taken from SureScreen Scientifics

Bats

Site 7 has multiple areas of woodland that are contained within the scheme as well as surrounded by many areas of woodland and habitat favoured by bats.

Trees considered ‘veteran’and ‘ancient’ by the Woodland Trust, are a perfect habitat for bats.

Bats are regularly sited around Site 7 and clearly have an established habitat.

These colonies are in addition to the maternity colonies of Barbestrelle Bats identified across the site. The Barbestrelle Bat is an Annex II species under the Habitats Directive and is classed as vulnerable in the UK. Whilst rare, East Anglia is a known stronghold for the species nationally, particularly Norfolk. As a result, it has been identified as one the **core areas suitable for the implementation of the Species Recovery Programme (Harris 2020).**

All bat species are legally protected in the UK as European Protected Species (EPS) in the Habitats Directive and under The Conservation of Habitats and Species Regulations 2017 and prohibits to impair their ability:

- To survive, breed, or reproduce; or to rear or nurture young;
- to hibernate or migrate;
- to affect significantly the local distribution or abundance of species;
- damage or destruction of a breeding site or resting place.

The Wildlife and Countryside Act 1981 states it is illegal to intentionally or recklessly disturb bats whilst in their place of shelter, or obstructing their access to shelter or protection.

A licence from Natural England is required and should not be issued for East Pye Solar to carry out their development as it does not meet the requirements.

East Pye Solar should not be issued permission to develop without the licence as it is undeliverable.

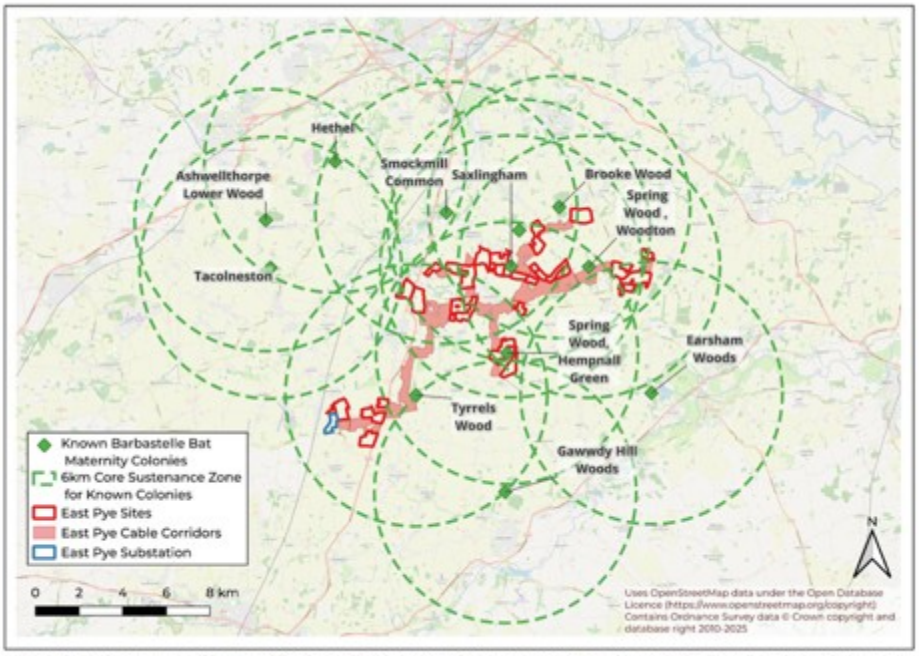


Figure 1. Core Sustenance Zones of Barbastelle Maternity Colonies within or close to the East Pye Solar Scheme Area

Badgers

Several active badger setts have been identified across Site 7.

The submitted badger information is redacted, so affected parties cannot determine whether the active setts have been identified, classified or assessed. This creates a serious uncertainty in the ecological baseline and in the assessment of construction disturbance, severance of foraging/commuting routes, collision risk, lighting, vibration, trench hazards and potential sett interference.

The Applicant should be required to confirm confidentially to the Examining Authority, Natural England and the relevant authority ecologists whether these setts are included in the ES badger survey; whether it is a main, annex, subsidiary or outlier sett; what activity level has been recorded; what buffer distances are proposed from haul routes, fencing, panels, trenches, lighting and construction compounds or substations; whether any works would require a Natural England licence; and where those measures are secured in the DCO requirements and certified documents.

Given that the setts lie in an area also associated with barbastrelle Core Sustenance Zone habitat and within a hydrologically connected landscape draining towards the River Tas with white clawed crayfish and ponds with great crested newts, skylarks, turtle doves and many

red listed birds across the fields, this cannot be treated as a minor isolated constraint. **It is further evidence that Site 7 forms part of a connected ecological network whose disturbance, fragmentation and cumulative effects have not been adequately fixed or assessed.**

Seasonal Surveys and Ground Nesting Birds

East Pye Solar have failed to survey the fields for **Lapwings**, **Skylarks** and **Turtle Doves** as well as seasonal surveys for other wildlife which are protected. The Applicant has relied upon desk top studies.

Absence of data doesn't mean absence.

Skylarks: are present on every field across the scheme and thriving due to protections in place and how the land is being managed. Skylarks will be highly impacted by mass removal of important habitat.

Two years of construction disturbance including the permanent removal of nesting sites for **Skylarks** within the solar sites and the removal of nesting sites, albeit temporary, for the two years of construction on the CRC, will have a serious impact to numbers, which can't be mitigated against.

Removing 810 acres of arable land on Site 7 and adding a few acres of meadow at Site 4B is a gesture not an answer especially when the accumulation of lost habitat is considerable.

In fact, including a small area surely acknowledges the importance and a significant habitat area for ground nesting birds.

Incorporating 12.5 hectares (30 acres) on four sites (3, 4B, 8B and 10B) is a tick box exercise in adding biodiversity net gain even though the removal of habitat is considerably more and that removal can only have a negative impact on numbers.

The EPS survey identified 81 nesting sites across the order limits and concluded that the Skylarks within the order limits represent <1% of county populations. Accordingly this number was viewed as unlikely to be considered significant in the national and county context. It is also dependent on how thorough the survey was. The survey didn't include the Cable Route Corridors.

However with the accumulation of schemes across the region, in particular the local area, eventually the detrimental impact will itself accumulate and the impact should be considered on a cumulative basis and not site by site or scheme by scheme.

If the same opinion of 'insignificant impact' was concluded at each scheme, by only looking on a scheme by scheme basis, then eventually the accumulative impact becomes significant but it will be too late. Each small impact adds up.

Starlings: Wintering birds like the **Starling** roost annually at Wood Green Common apart for the year when the bypass was being constructed and they moved on (2024-2025). This shows the disruption a significant construction scheme can have on these red listed birds and others too.

They can be seen in several locations including across Site 7 and murmurate in a spectacular display at sunset before dropping into reed beds and roosts, rising again at sunrise. The winter of 2025-2026 saw a return to Wood Green but not the full numbers of pre bypass construction.

Turtle Doves: have been seen on Sub-site 7A whilst **Song Thrushes** (amber listed) and **Mistle Thrushes** (red listed) return annually across Site 7.

Fieldfares (red listed) and **Redwings (amber listed) :** are in abundance across the winter fields of the scheme and overnight in flocks in the trees of the small corpses and significant hedgerows across Site 7 and across the Scheme. Removal or disturbance of significant hedgerow across the Order Limits during the construction will have a serious detrimental effect to these struggling birds.

Otters: were reported as not being present surrounding the order limits yet there are known breeding family units in the Starston Beck and Hempnall Beck which are within the order limits as well as in the Tas.

Missing private water supply surveys and consultation?

Environmental Impact Assessment conducted by East Pye Solar failed to survey sufficiently the private water supplies for properties surrounding site 7.

In addition to private water supplies, most properties have **private sewage systems** such as septic tanks and treatment plants and these **have not been assessed at all.**

Impact will be significantly affected primarily through:

- increased flood risk - site 7B is in flood zone 3;

- altered surface water drainage;

Solar panels increase the concentration of rainwater that drains off them, increasing the speed and volume of runoff in the spaces in between rows. Run-off has been observed to appear in channels on the ground as distribution of water changes to an unnatural fall. This can lead to **soil erosion and water logging (**Sciencedirect**), potentially overloading or damaging existing land drainage systems that private sewage systems rely on. This should be considered a public health issue.**

Soil compaction during construction, operation, replacement and decommissioning reduces the grounds permeability which could impact the functionality of soakaways especially if not managed.

Risk of **sediment or pollutants** entering the system as well as affecting the functionality of the system is a significant risk to public health and ecology.



Noise

No noise assessments have been carried out on Cable Route Corridors including the internal haul road across Site 7, trenching, HDD and AIL and HGV routes.

The Applicant has considered the NSR to include CRC.

Utilities

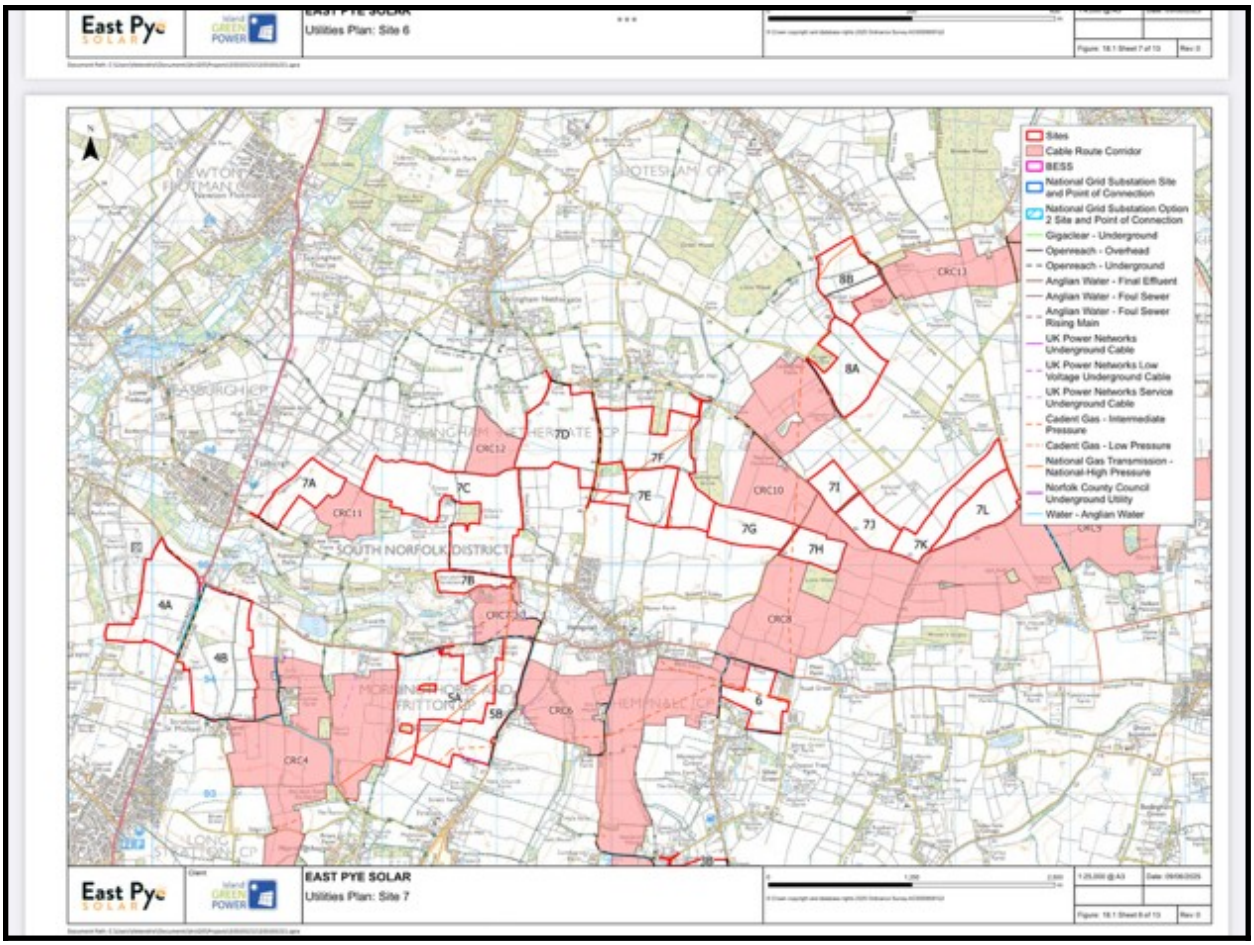
Site 7 has multiple utilities running along the boundary edges, road side verges and across sites including underground cabling as well as overhead power lines.

These have not been accessed nor mapped.

No mapping or assessment has been carried out on Cable Route Corridors

With limited Broadband connectivity, rural communities rely on satellite services like Starlink. Many mobile phone providers are now abandoning new masts due to the long planning process and offering back up signal via Satelitte.

The Scheme includes extensive power conversion equipment, BESS installations and multiple high-voltage substations. The Environmental Statement should clarify whether electromagnetic emissions have been assessed for compatibility with modern satellite broadband services operating in Ku- and Ka-band frequencies, including user terminals located within the nearby rural properties, together with any proposed monitoring and complaint resolution procedures should interference be reported during operation.



Water for Cleaning Panels

Where's the water coming from?

East Pye Solar will be using wheel washing amenities without stating how much water will be required and where the water is coming from and where the water will go afterwards. Runoff into the waterways and ditches, especially in the vicinity of the Tas tributaries, is of concern for pollution.

However the real question is water for the panel cleaning.

East Pye Solar will require 7,136 cubic meters or 7,136,000 litres (the equivalent to 2.85 Olympic-sized swimming pools)

East Pye states they will clean by using water only.

De-ionised water would be transported to the Order Limits by tanker. It doesn't state the size of the tanker nor how many journeys that will be so looking at a tanker from 10,000 litres to

40,000 litres that would equate to **714 @ 10,000 litres to 179 tankers for 40,000 litres which is 1428 to 358 two-way journeys,** no doubt all using fossil fuel.

The di-ionising water process also requires more energy. Has this been included in the impact of the Scheme?

Anglian Water hasn't agreed access to supply, so where will the water for cleaning come from?

Assuming all water companies will also be protecting supply to avoid the scenario of Cleve Hill Solar in Kent using local supply from standpipes and leaving residents with no water at all, **how can this water volume be achieved**? Add this to the accumulative impact of other Schemes across the region and the water requirements will be huge and hasn't been addressed in any of the documents.

East Pye Solar documents (The Scheme APP/6.1.4) state that due to the *'wet UK climate, Solar PV Panels are largely self-cleaning and determination in supply due to dust or dirt is generally low. Yet the requirement and frequency of cleaning the panels is due to the build-up of dust and dirt which depends on specific conditions. For example, the presence of fine dust emitters such as quarries, agricultural operations (harvesting) and nearby woodlands can all impact the level of dust deposition.'*

With the expansion of the quarry off the B1527 between Site 4B and 5A as well as the area being predominantly agricultural (crop farming) as well as small and larger wooded areas, the chance of dust deposition has to be considered very high. If I didn't clean my windows for two months (which are vertical) they would be filthy from dust off the fields and trees, bird poo and insect impact or spiders webs.

The documents state, *'the main factor influencing cleaning requirements in the UK is lichen growth, which is also influenced by site and climate factor*s.'

Lichens grow on solar panels through symbiotic relationship between algae and fungi in a 3-stage process:

- **Initial Algae Bloom:** Moisture trapped along the lower edges of panel frames, combined with sunlight and organic debris (or nitrogen-rich bird droppings), allows algae to form a slimy, green layer.
- **Symbiotic Bond**: Once the algae is established, fungal spores take hold. The fungus feeds off the sugars produced by the algae and, in return, locks onto the microscopic texture of the glass.

- **Hardening**: The fungus acts as a natural glue, anchoring the composite organism tightly to the panel surface. It then slowly spreads across the glass, feeding on environmental nutrients and carbon dioxide.

Why It's a Problem for Solar Panels

- **Reduced Output**: Lichen heavily shades the underlying photovoltaic cells. Studies show that a severe infestation can reduce energy output by 15–25%, even on sunny days.
- **Permanent Damage:** As the fungus grows, it acts corrosively and can permanently etch or scratch protective anti-reflective coatings on the glass.
- **Hot Spots:** By completely blocking individual solar cells, lichen forces the surrounding functional cells to work harder to bypass the blockage. This generates excess heat, which can permanently damage the panel

Risk Factors for Lichen Growth

Lichen needs water and sunlight, both of which solar arrays are exposed to. Growth is accelerated by nutrients such as nitrogen and ammonia:

Bird droppings are rich in nitrogen, which is fuel for lichen growth. If birds perch at the top of the panels, rain can dissolve any droppings, run down to the bottom edge and feed algae if present.

Oak trees have been linked to an increase in lichens on modules near them within solar farms. This is likely due to rain falling through the canopy, depositing nutrient-rich bird droppings and aphids' sticky honeydew. The trees also increase local humidity, creating more favourable conditions for algae and lichens to grow. What’s less clear, as yet, is why lichen growth seems to be so much greater close to oak than any other tree species.

Farms - particularly dairy, poultry and grain stores - contribute to high local levels of nitrogen and ammonia in the air, both of which fuel lichen growth. Cattle produce a lot of ammonia emissions around where the animals are housed, and so can poultry, especially in moist conditions. Crop spraying can catch in the wind and blow liquid or gaseous nitrogen onto nearby solar panels. Similarly, fertilisers can incur a spread of nitrogen and ammonia quite a distance.

Norfolk is the perfect climate for lichen growth as the climate is relatively mild and damp. All the components to grow lichen are readily available across the Order Limits.

The area is surrounded by poultry, beef and pig farms. Also, as a large crop area, grain stores and mills are located within the Order Limits. Organic matter (muck) spreading is normal practice across all arable fields.

Norfolk is a major oak tree area with the English Oak serving as the most common broadleaf tree species in the county. The Norfolk Landscape Tree Study found that the oak is the dominant deciduous tree in Norfolk's woodlands and can be found growing in more than 50% of the county's hedgerows and a major habitat for the region's abundance of birds.

'The requirement for cleaning due to loss of output is balanced against the cost of the cleaning operation. East Pye Solar believes that some sites can operate ***without*** *the need to be cleaned, whereas others require cleaning* ***annually****.'*

It won't be known until the Scheme is operational about the need for cleaning so, *on a worse case* assessment is assumed as a two-year cycle, although the documents make it unclear if that is the whole site.

However, what about those that require cleaning more regularly or the worst case is underestimated? All sites are surrounded by birds, oak trees and farming whilst others have quarries too. The additional impact of those next to main and busy roads like the A140 and B1527 with dust, dirt and debris, will increase.

Operational Waste

Site waste would primarily be general (Household Type) from staff visiting. Although it states in the documents it will be segregated for disposal it does not state where it will be disposed of nor the impact to local services.

Waste components such as damaged PV Panels, batteries, cables, connectors and mounting structures would be removed and recycled as far as possible.

However East Pye Solar doesn't state where they will be disposed of and as solar panels are classified as hazardous WEEE (Waste Electrical and Electronic Equipment) they cannot be legally sent to landfills in the UK. Compliant disposal requires using WEEE-approved facilities to recover valuable materials like aluminium, glass and silicon.

Panels contain toxic materials which require specialised treatment.

Industrial-sized solar would require an Environment Agency permitted Approved Authorised Treatment Facility (AATF) which would need to be able to cope with not just decommissioning but also the replacement of panels several times across the scheme.

Operational Staff

Throughout the consultation period the community were being told the Scheme will create **'local jobs for local people'.**

East Pye documents state **'no permanent on-site staff will be required to operate the Scheme**. There will be limited staff facilities located in the control room associated with the 132kV and 400kV Substations. Equipment for monitoring the Sites will be located in the Relay and Control Room. This would typically be **accessed remotely,** it would be available for occasional physical access during routine visits.'

Workers will be required for full solar replacement (129-240) which will be the construction team that are shipped about.

Otherwise it will be ad hoc limited maintenance roles including cleaning and up to 5 visits a month.

So local people were being told inaccurate information as a local benefit to the Scheme.

Yet multiple jobs will be lost across the area in agriculture and the agricultural supply chain, hospitality, tourism.

Views from Listed Properties

Site 7 is bordered by many listed properties of Grade I, Grade II* and Grade II.

All have uninterrupted views across open countryside which will be removed and replaced by views of industrialisation; panels, substation, security fencing, CCTV etc.

Landscaping across the scheme will take at least 15 years to become established but the landscape itself changes the character of the open countryside to one of enclosure, out of character and 'alien'.

Natural landscape includes significant hedging and individual trees dotted around. The artificial landscaping will create a thick, unnatural appearance with an emphasis on screening.

See Chapter 7.3 Visual Effects on Residents and Settlements for more detail.

Visual Assessment Tables

The Visibility Assessment Tables are subjective.

In the same way the person responsible for Landscaping considered, at the Zoom consultation, that the 400kV substation on Site 5 can't be hidden, even after 15yrs, as "it's too tall, but what's wrong with a substation on a field anyway?"

Visibility is considered 'minor/negligible even if the view is changed significantly. For example, VL10 South West of A140/B1527 roundabout looking across sub-site 4B.

'The substation and solar arrays would remain a clearly noticeable change in the view of the location however influenced by man-made structures like highways, road signs and the roundabout which would reduce the overall effect somewhat'.

Screening would not be performing at Year 1 however by Year 15 it was considered (if successfully established) that 'visibility of the elements within site 7 is predicted to reduce.'

'However, glimpses of solar at maximum height (4.5m) and the 132kV substation (13m) would remain possible resulting in perceptible change from baseline conditions.'

Yet this is considered minor/negligible.

It is also worth stating at this point that screening would equally change the baseline conditions significantly by creating a feeling of enclosure as opposed to the open vistas and character of the landscape as it is today.

Driving down the highway between site 4A and 4B for example never makes me feel the view is insignificant due to the highway, signs and roundabout. It's open and green/yellow and beautiful. An example of how East Pye Solar considers local countryside as insignificant in order to fit the scheme.



Sub-Site 4B Spring 2026



View across Sub-site 4B January afternoon 2026 with man-made structures



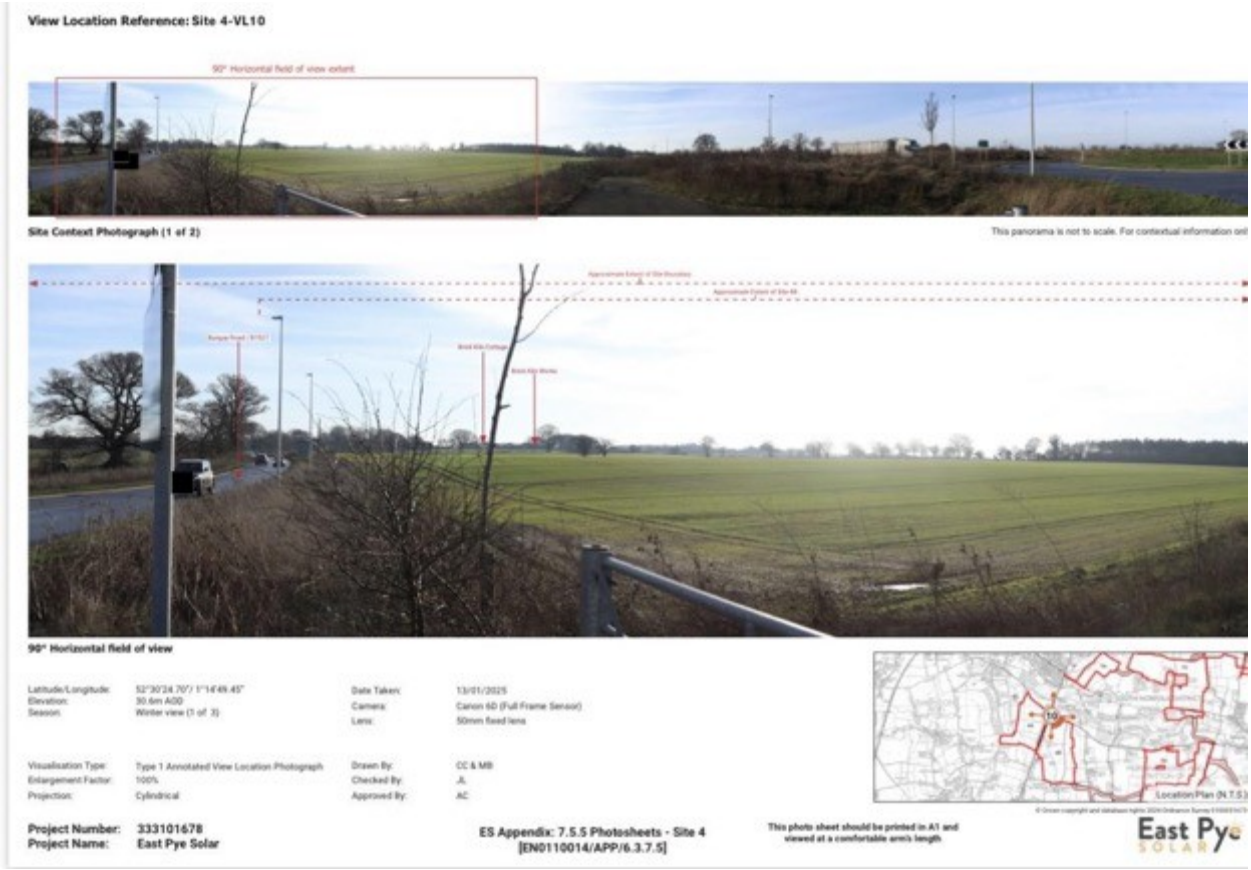
View across Sub-site 4B January afternoon 2026 with man-made structures



View across Sub-site 4B January 2026 with man-made structures



View across Sub-Site 4B January 2026 with man-made structures



East Pye Own documents show open views across sub-site 4B

Chapter 3: Site and Surroundings

Site 7 is the largest of all sites with 12 Sub-sites covering five parishes of Tasburgh, Hempnall. Saxlingham, Shotesham, and Woodton.

The total internal area of Site 7 is 2140 acres and includes solar fields, cable route corridors, a 132kV substation as well as agricultural fields that will continue to be farmed.

The area of Site 7 is an important wildlife habitat and of ecological significance.

The fields are mainly BMV Grade 1-3a growing a combination of cereal crops



Saxlingham - East | Solar sites (shaded in red) Cable Route Corridors (shaded in yellow)



Part of Saxlingham Green Solar Site - (Shaded in Red) Many footpaths directly affected





Solar Sites: 5B, 6, 7B, 7C, 7D, 7E, 7F, 7G, 7H.
CRC: 6, 7, 8, 11, 12

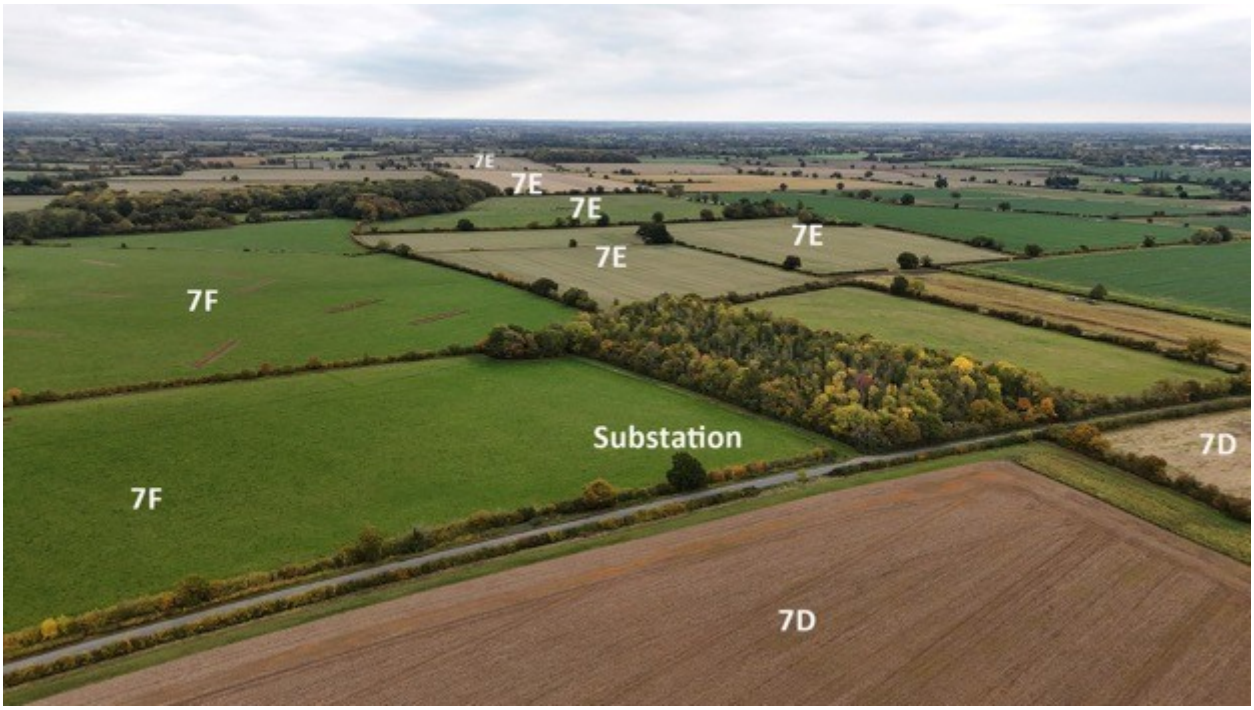
Hempnall - North West
(Looking East)





The visibility of Site 7 can be seen for miles in all directions. The boundary of Sub-site 7C is within metres of Grove Farmhouse and Wood Farmhouse.


7B
7C
7D
7D
7D


7E
7E
7E
7E
7E
7F
Substation
7D
7F
7D



Wood Farm and Grove Farm surrounded by Sub-site 7C will be within metres of the proposed with open views on all sides replaced by 4.5m high banks of tracking panels, security fencing, CCTV.


7E
7E
7E
7E
7E
7F
7F
7F
7D
7D
7D
7D


7C
7C
7C
7D
7D


7G
7F
7E
7E
7D
7D
7D
7C



Fairstead Lane west looking towards Tilla Farmshop which will be surrounded and access to their business will be seriously affected



Limetree Farm is a Grade II listed farmhouse with its own private drinking water from a borehole which hasn’t been surveyed.



Fairstead Lane is a single track lane with very few passing points. It is mainly used for access by farm vehicles, visitors to Tilla Farm Shop and the few homes along the route.

Both sides of Fairstead Lane are bordered by significant hedgerow and mature trees.



Sub-site 7A sloping towards the south-west boundary and an unnamed waterway that flows towards the Hempnall Beck, a tributary of the river Tas. Growing spring barley 2026



Chestnut Loke is a small track off Fairstead Lane that takes you to Keepers Cottage and the Hempnall Beck



Boudicca Way traverses Site 7, in particular at Fairstead Lane, and is a popular long distance hiking trail between Norwich and Diss which celebrates Queen Boudicca of the ancient Iceni Tribe which was located a few miles away at Caistor St Edmund.

Boudicca Way passes through the rural gently undulating countryside of South Norfolk and the Waveney Valley using Public Rights of Way and quiet country roads where visitors can find unusual wildlife and flora.

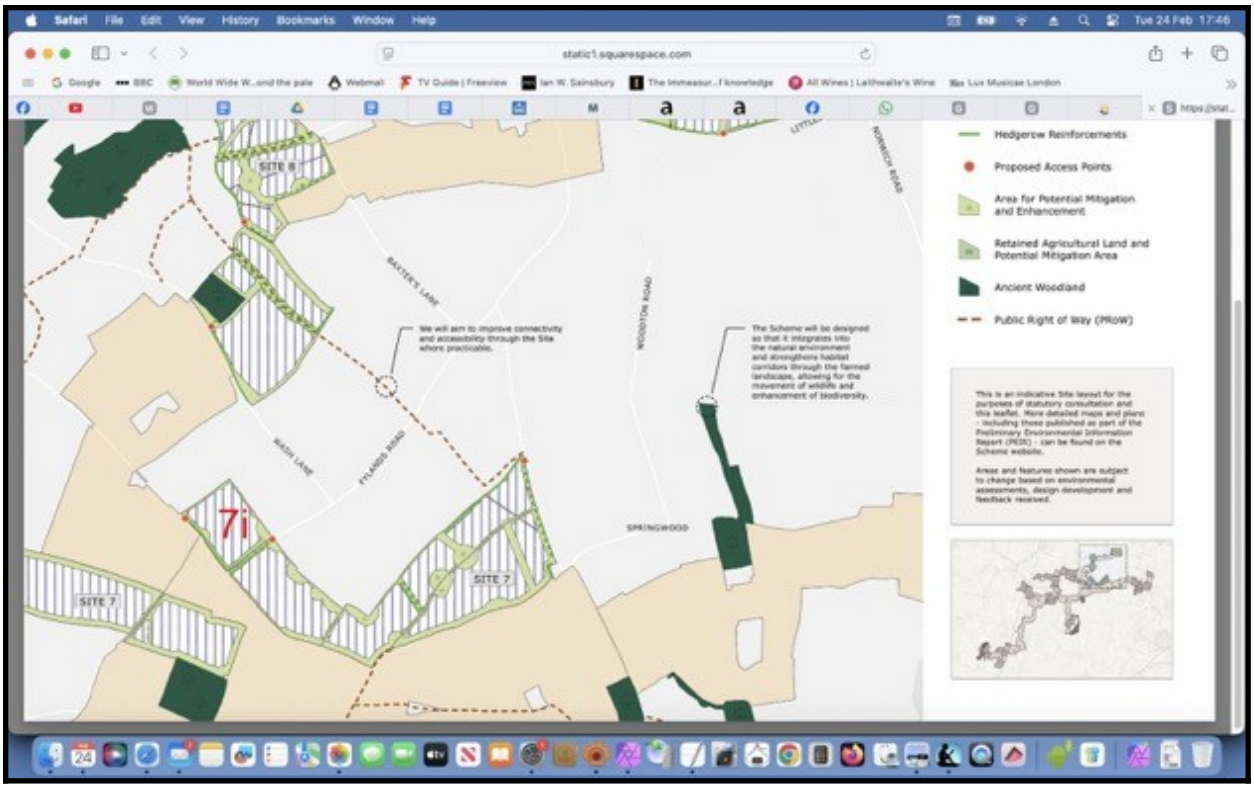
Along the way the trail passes picturesque villages such as Shotesham, Saxlingham Nethergate and Pulham Market



Wood Farm will be surrounded by Sub-Site 7C on three sides and will overlook Sub-site 7B

Sub-Site 7I

A square field on the east boundary of Site 7 and within the parish of Shotesham



EPS map showing Sub-site 7I



View from north east corner of Sub-site 7I, looking north (approx)



View from north east corner of Sub-site 7I, looking west (approx)



View across Sub-site 7I from the north west corner, looking north west (approx) note waterlogged ground



View from the south west corner of Sun-Site 7I looking east (approx)



View from the south west corner of Sun-site7I, looking north east (approx)



View from the south west corner of Sub-site 7I, looking north (approx)



View from the north east corner of Sub-site 7I, looking south (approx)



View from the north east corner of Sub-site 7I, looking east (approx)



The lane along the southern edge of Sub-site7I



The lane along the western edge of Sub-site 7I

Saxlingham Nethergate

Sub-site 7F will host the 132kV substation which is in sight of listed buildings on the Green.

The presence of high pressure gas main represents associated severe ecological and hydrological safety risks.

The field drainage pipes across all land parcels and under unclassified access roads for AILs are unsuitable for heavy vehicles.

Sub-sites 7D and 7F adjoin Saxlingham Green Conservation Area - a designated locality of special architectural and historic interest; protected by local authorities to preserve or enhance its unique character and appearance. The Conservation Area contains ten listed buildings and the proposed development would introduce dominant, permanent infrastructure wholly incompatible with this character. The proposed AIL route has a further 17 listed buildings close to the road.

Saxlingham Green is a small settlement located off the minor route between Saxlingham Nethergate and Hempnall to the south. The unclassified road which bisects The Green eventually links with other minor roads linking the settlement with Hempnall to the south and Brooke to the north-east.

Section 72 of Planning (Listed Buildings and Conservation Areas) Act 1990 imposes a duty:

> *"special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area."*

The Saxlingham Green conservation area was originally designated in 1973. There is an adjacent SSSI that includes areas of Woodland Priority Habitat Network and Woodland Improvement of high special priority.

Natural character dominates with the buildings being secondary to it:

- There are a number of fine historic buildings dispersed within the area;
- Situated on "plateau" site to the south east of Saxlingham Nethergate;
- Linked to surrounding countryside by a matrix of footpaths and bridleways;
- Much of The Green is enclosed by groups of mature trees together with hedgerows;
- The Green follows the line of the road but is made up of separate areas which provide a series of changing views and vistas.

Section 66(1) of The Planning (Listed Buildings and Conservation Areas) Act 1990 imposes a duty on local authorities, or, as the case may be, the Secretary of State, when considering applications that affect a listed building or its setting, to:

"have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses".

The Green is surrounded by a network of footpaths and the land parcel 7D and 7F would be severely adversely affected by the development, as shown below:



Part of Saxlingham Green Solar Site - (Shaded in Red) Many footpaths directly affected

A development of this nature will create a significantly high amount of construction traffic using rural roads and rights of way. This construction traffic will bring high disruption and give rise to a very real danger to pedestrians and riders of horses along with other rural road users, demonstrating that single track rural lanes are fundamentally unsuitable for sustained use by heavy delivery vehicles.
In a recent British Horse Society article, it states drivers pass too quickly and closely and cause 81% of equine related incidents.

Fencing: The security fencing proposed is normally metal palisade and brings with it safety implications. Its top is likely to be at or below chest height for equestrian riders and will result in injury if a rider is thrown from the horse.
Fencing can be intimidating, combined with a narrow corridor, creating a conflict for Bridleway and By-way users (horse riders, dog walkers, pedestrians, cyclists).
Being narrow and confined removes an escape route from a threat which would be capable on an open field.
Although hedges may be proposed these take years to establish. The fencing is intrusive and will also create unpleasant alleyways.

Saxlingham Green is home to a number of ancient trees which line the lane on the grass verges that will be disturbed greatly by large numbers of heavy vehicles. The trees overhang the road.

- At least 11 ancient oak trees, all over 500 years old
- 14 horse chestnut trees at least 200 hundred years old

- 2 lime trees over 200 hundred years old



Above photo of the entrance to Saxlingham Green looking west to the village. A line of ancient Oak trees. Grid ref: TM2378 9660



Above photo of the boundary of 7F taken from the footpath looking towards Woods End Cottage on the Saxlingham Green. TM2413 9636

Chapter 4: Reasonable Alternatives and Design Evolution

Site 7 is the largest of all sites within the Order Limits consisting of 12 Sub-sites of mainly BMV Grade 1-3a agricultural land growing a mixture of crops with some grazing.

The area is of high significance for ecology, tranquility and heritage.

Site 7 incorporates five villages and parishes with Conservation Areas, multiple listed buildings and much heritage.

Some changes have been made to the Site mainly in the way of transport routes and internal haul roads.

The access routes have been changed to using a non classified road through a network of small villages or holding compounds impacting major transport routes.

It's impossible to accurately trace the route as the maps and Access points aren't clear however there appears to be some error to Site 7G-H.

Site 7A-F - using Hempnall Footpath 2

- using Access points A28, A29, A30, A40, A42
- From A140: south on Hempnall roundabout onto Site 4A via A19;
- Await call-foreward to site;
- Eastbound on Hempnall Roundabout to B1527;
- Northbound on The Krons;
- Westbound on on Fairstead Lane;
- North onto A29/A31;
- Internal haul route to Sites 7A-F;
- Cross Broaden Lane via A40 for access to 7E-F;
- FOr southern portion of Site 7D, southbound on Broaden Lane and west onto A42;
- Depart on same route in reverse.

Site 7G-H

- Using Access points A45, A57;
- From B1332, westbound on B1527;
- Northbound on Shotesham Road and Woodton Road;
- West onto A57;
- Internal haul route through 7K and 7J;
- Exit on A45;
- Southwest on Fylands Road;
- Busseys Loke east/west on A44
- Depart on same route in reverse.

Site 7I-J

- Using Access points A45, A57;
- From B1332, westbound on B1527;
- Northbound on Shotesham Road and Woodton Road;
- West onto A57;
- Internal haul route through 7K and 7J;
- Cross on A45 for access to 7I;
- Depart on same route in reverse.

Site 7K-L

- Access points A57, A58;
- From B1332, westbound on B1527;
- Northbound on Shotesham Road and Woodton Road;
- West onto A57/A58;
- Depart on same route in reverse.

The proposal does not have adequate access to, or is remote from, the HGV Route Hierarchy, as classified in Highway Authority's Route Hierarchy published by Norfolk County Council.

The proposal, if permitted, would be likely to give rise to conditions detrimental to safe sustainable development in transport terms.

Two-way movement of traffic will fundamentally rely on a rural lane network that is not designed to accommodate this level of construction traffic or large vehicles.

In most places it will be impossible for two vehicles to pass. Video footage has already shown this on Church Hill in Saxlingham Nethergate. There are also significant concerns regarding the safety of vulnerable road users, including pedestrians, cyclists, and horse riders. The unclassified roads serving sites 7D and 7F are considered to be inadequate to serve the development proposed, by reason of their restricted width, lack of passing provision, road structure and underlying drainage pipes etc., and impact on foundations of nearby dwellings. The proposal, if permitted, would be likely to give rise to conditions detrimental to highway safety, in addition to the ability of the HGVs to pass. The current proposals do not sufficiently address the needs of all vulnerable road users along the proposed route.The AIL haulage units are wider than much of the current road on the route, higher than much of the overhanging tree vegetation and too long to take the many turns without considerable unspecified verge, hedgerow and tree removal and ditch filling. And they are likely to cause untold damage to verges, bridges, the roads themselves and drains and other services running beneath them.

The proposed new route and how East Pye intends to make it suitable for its purposes is very lacking in any detail, or signs of any research, from the company. But it is apparent to anyone who uses it that it is completely unsuitable for the vehicles they are proposing to use.

The new AIL haulage route plans to pass through the narrow road of Saxlingham Nethergate village. The houses, many grade II listed with ancient walls and railing are close to the road, with no possible means of a wide load passing through.



Narrow road through Saxlingham Nethergate. Above photo of The Old School, a Grade II listed dwelling on a narrow bend at the bottom of Church Hill. Grid ref: TM23009710

In addition, the AIL route goes through the conservation area of the village which includes the school (requiring pavement access for children) the War Memorial (which will be impacted) and a number of vulnerable buildings already close to the road edge but, with proposed unspecified verge and pavement removal/reduction, will be made even more vulnerable to vibration and other damage. The drone picture below shows narrow road, listed buildings on either side. The trees on

the left are behind a grade II listed high wall. (Courtesy of Lockwood Chartered Surveyors).



The photo below is a close up of an ancient brick wall on the roadside of the proposed AIL route.



On the Green, Saxlingham Hall is a grade II listed residential nursing home on the green and patients are often seen being taken out in wheel chairs along the lane. This would be impossible if heavy goods vehicles were using this lane to access field parcel 7F and beyond for the cable corridors. The peace and tranquility that patients and their families currently enjoy would be shattered. The road is of poor quality and not designed for heavy use and would not withstand constant heavy traffic. Boudicca Way runs along the road on the green and is used by ramblers and cyclists. This road is less than 4 metres wide and often with high banks making it difficult for two vehicles to pass each other.

The drone picture below highlights the rurality and narrow lane on Saxlingham Green (Courtesy of Lockwood Chartered Surveyors).



The photograph below is looking towards Grade II listed dwelling Holly Cottage (226637) on Saxlingham Green and the area where road widening is proposed and a high pressure gas pipe is situated. Grid ref: TM2471 9647



7A access was part of the targeted consultation October 2025 yet has now been changed yet access is not clear in the documents.

Chapter 5: Scheme Description for this land parcel

What Site 7 can expect if plans are passed:

Overview

- Solar array panels - 4.5m high tracking
- Mounting structures
- Cabling
- Cable Corridor
- Conversion Units compounds
- 132kV substation
- Construction Compound (unsure are not shown on current plans but where will it be?)
- Interconnecting cables
- Security Fences
- CCTV
- Lighting
- Access points leading to removal of vegetation for visibility to 250m
- Panel Change
- Panel Cleaning
- Operation
- Maintenance of SIte
- Decommisioning
- Closure of Footpaths

PV PANELS

There are currently two options for the Mounting Structures which are being considered for the scheme which are described below.

Solar PV Arrays and Mounting Structure

The Scheme will use Single-Axis 4.5m high Tracker Panels (Option A) and/ or Fixed Panels (Option B). The parameters for each of these options are described below.

Option A: Single-Axis Tracker Panels

- **Site 7 will have 4.5m Single-Axis tracker Panels**
- PV Panels which are fixed to the Mounting Structure;
- Orientated north to south;
- They would operate between 60 degrees from the horizontal (facing east in the morning) moving toward 0 degrees (horizontal) at midday, and up to 60 degrees from the horizontal (facing west in the evening);

- The modules would track from east to west throughout the day and would return to their resting position 60 degrees (facing east) over night noting that at some point during the night will be 0 degrees (horizontal) and detrimental to foraging bats mistaking panels as water;
- The panels would face multiple highways during the day, east and west, with a **risk of glint and glare being significant;**
- The panels will be visible from the A140 and could be at risk of glint and glare when facing west;
- **The PV Panel would have a maximum height of 4.5m**



Image 1 Tracker Panels



Example of a 4.5m high tracking panel next to a person 1.65m tall. Average car is 1.40cm to 1.60cm

Option B: Fixed South Facing PV Arrays

PV panels that face south and are mounted to fixed Mounting Structures in an east/west configuration and would be installed between 15 and 35 degrees to the horizontal facing south to optimise daylight absorption. The PV Panel would have a maximum height of 3.5m



It's worth noting at this point that a small solar scheme at Hall Farm that sits on the west boundary to site 4A has fixed panels sited facing south and offers glint and glare when the sun catches them at the end of the day.

The same is the case for the Bloys Grove scheme at Mulbarton further up the A140 which is also fixed panels facing south and offers glint and glare distraction as the sun is starting to set.





Hall Farm, 20/5/2026 at 20:22 light cloud



Bloys Grove, Mulbarton March 2026 at 5.40pm

SOLAR PV MOUNTING STRUCTURE

The metal frames upon which the PV Panels will be mounted will be **pile driven or screw mounted into the ground to maximum depth of 4m**, subject to ground conditions. Please see

ChapterGround Conditions for Site 7 as they vary and a ‘one size fits all’ doesn’t work for this vast Site.

The option to install concrete blocks as ballast may be considered, avoiding the need for driven and screw anchored installation.

The mounting frames would be made of either anodised aluminium alloy or galvanized steel.

CABLING

- Low voltage distribution cabling between the solar PV Panels and to the Conversion Unit compounds;
- Fixed to the Mounting Structure, and then underground between Mounting Structures and the Conversion Unit compounds.

High voltage cables are required between the Conversion Unit compounds, BESS and the 400kV Substation. Each site will connect to another site via the cable corridors.

CABLE CORRIDOR and INTERNAL HAUL ROAD

The following activities would be required to construct the interconnecting Cables Grid Connection Cables:

- Site preparation and appropriate surveys;
- Haul road construction;
- Excavation would be undertaken using appropriate sized tracked excavator and carried out in layers;
- Top soil would be segregated and stored on-site to be reused;
- The trench would be cleared and bottomed out, ensuring no hard protrusions;
- Sand bedding would be installed at the bottom of the trench;
- Cable installation will be conducted once joint bay locations have been established. However, it is not expected that cable installation would be continuous. Cables would be installed in groups or sections to ensure that works are completed in the most efficient manner practicable.

CONVERSION UNITS

Conversion Unit, a collective term used for the combination of electrical components including inverters, transformers and switchgear, used to manage the electricity generated by the PV Panels. The components may be housed together within a container on each site.

A container would measure approximately 3.5m (H) x 5m (W) x 15m (L).

Or the alternative option is for the individual electrical components to be housed in standalone cabinets. If in stand alone cabinets, the Conversion Unit compound would be surrounded by 3m high palisade fencing, with integrated gates for access. The compound will be leveled and covered in a layer of gravel of 1m.

The containers would be mounted on adjustable legs on an area of concrete hardstanding.

The configuration of equipment within the Conversion Unit compounds may vary however will consist of:

- Inverters
- Transformers
- Switchgears

Inverters

There are two options for inverters; string inverters or inverters located within a conversion unit compound.

String inverters are small enough to be mounted underneath or behind the PV Panels on the Mounting Structures and are typically 1.5m in length and 0.5m in depth by 1m high.

Inverters located within the Conversion Unit compound would either be standalone cabinets or housed within the container. The maximum size of a stand alone inverter would be **6m x 2.4m with a maximum height of 2.9m.**



Image 3 String Inverter



Image 4 Central Inverter Unit

Transformers

Required to increase and decrease the voltage of electricity generated by the solar PV arrays.

Should a standalone transformer option be required, the maximum dimensions would be **43m by 65m with a maximum height of 6.5m**

Switchgears

Switchgears are the combination of electrical disconnect switches, fuses or circuit breakers used to control, protect and isolate electric equipment.

Should a standalone switchgear be required, the maximum dimensions would be **6.5m x 9m with a maximum height of 4m.**

SUBSTATION

A 132kV substation is planned for sub-sire 7F adjacent.

These substations are comprised of electrical infrastructure such as the Transformers, Switchgear and control equipment required to facilitate the export of electricity. The transformers associated with the 132kV Substations will either be single or dual.

Maximum **compound** parameters for site 7F:

- Maximum area of compound o.5 hectare or 1.236 acres;
- Maximum height: 7m to the top of busbars;
- Relay and Control Rooms: 7m by 19m and maximum height of 4.2m;
- **Maximum height: 6.5m to top of busbars**

The compound will be surrounded by palisade fencing to a height of 3m.



Image 132/33kV Substation (single transformer) East Pye Solar

INTERCONNECTING CABLES WITHIN THE SITES



The solar PV arrays will be connected to the 132kV substations via interconnecting cables. The cables may be installed underground or within casing attached to the mounting structures.

FENCING AND SECURITY

Perimeter fencing would be in place throughout the Sites surrounding the solar PV arrays and will comprise deer wire mesh with wooden posts at a **maximum height of 2.5m.**

Pole-mounted, internal-facing CCTV systems will be installed around the perimeter of sites on galvanized steel poles with a **maximum height of 3m**.

LIGHTING

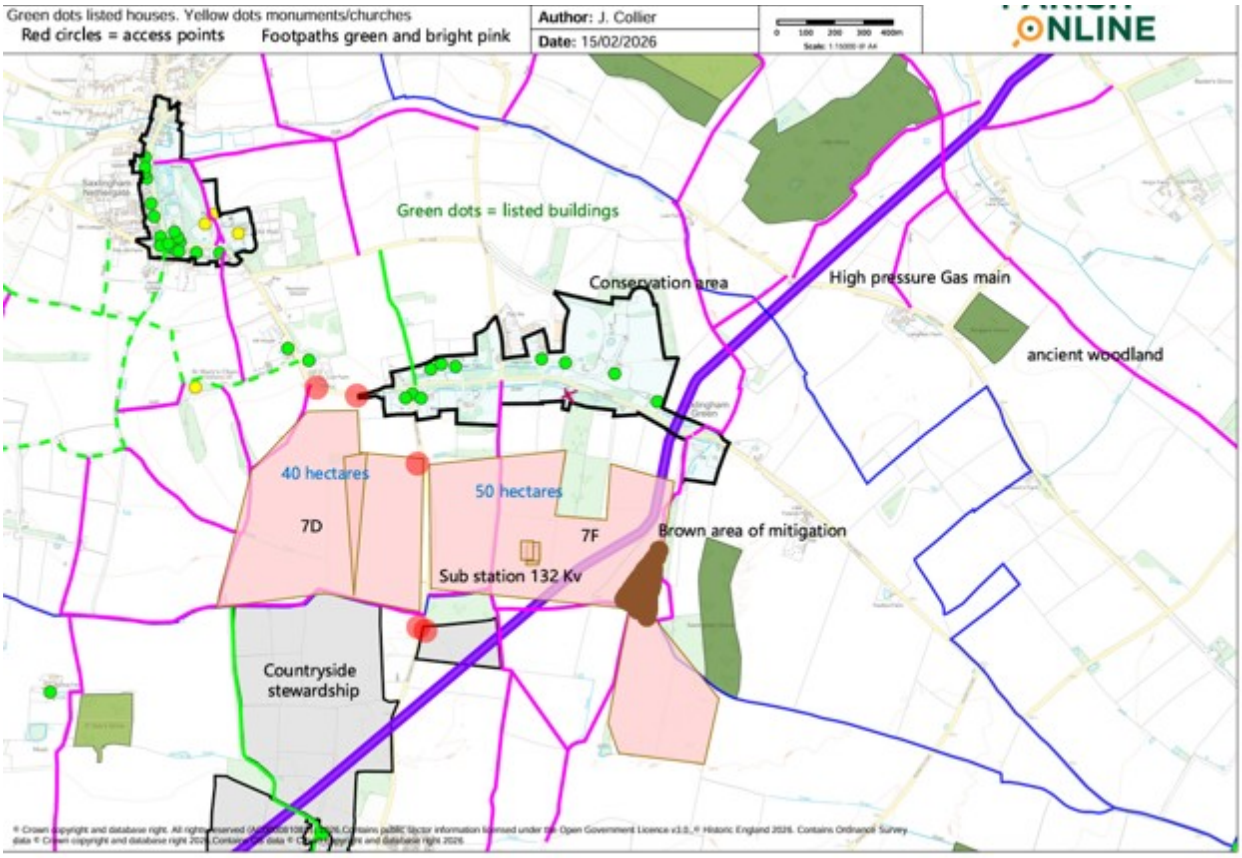
Motion-sensing security lighting will be provided within the substation, conversion unit compounds, to be used for maintenance and security purposes. In the event of an emergency, lighting will also be provided.

Temporary on-site lighting will be required during construction to enable safe working hours of darkness within the agreed working hours.

This lighting will be suitably designed as far as reasonably practicable so as to not cause nuisance and would accord with good practice measures to minimise light spill and glare. However of course this cannot be guaranteed especially when in the countryside there is no artificial lighting outside of the minimum offered in towns and villages.

SITE ACCESS

Access points into each Site or sub-Site will be designed to accommodate an articulated HGV with a maximum length of 16.5m. Visibility splays of 2.4m and 215m are required. In addition to the HGVs, Articulated Indivisible Loads (AIL) of up to 36.5m long will require additional consideration



Land Parcel 7D and 7F have a total 90 hectares of solar panel with an unspecified number of inverters plus a 132kV substation which could measure up to 63x68 m of footprint and at least 6.5 metres high, totally dominating the landscape including the views from listed buildings on The Green. These land parcels are surrounded on all sides and dissected by numerous public footpaths including the Boudica Way. In addition, a high pressure gas mains pipe dissects 7F.



Substation on land parcel 7F

A 132kV Substation, covering 0.75 hectares, is proposed for the southern edge of Land Parcel 7F, bordered to the west by PRoW SN-FP10 and to the south by PRoW SN-FP27. Underground, a high-pressure National Gas Main passes its south eastern corner.

The choice of location was deliberate - 'Substations 1 (4B) and 2 (7F) both utilise the corners of fields. The site selection process has considered land quality, with the choice of location balancing land quality with other operational, landscape and access considerations' 15.8.47

The land within 7F is BMV grade 2, principally clay and subject to flooding. The surrounding landscape is agricultural, quiet, dark and tranquil, bordered to the north by Saxlingham Green, a heritage-rich conservation area, with numerous listed buildings. Access is planned from Broaden Lane (an un-lettered/numbered road) to the west and so a haul road capable of supporting an AIL vehicle carrying a transformer will need to be constructed across the western part of 7F to reach the substation. None of those factors would suggest this particular location to be in any way ideal, as is suggested above.

Some details have been provided about the 132kV substation on 7F:

- It will cover an area of 0.75 hectares, understood to be about the size of a football pitch.

- The compound will be surrounded by palisade fencing at a maximum height of 3m (9.84ft). There will be CCTV, on poles of 4.0 m (13ft) and lighting similar to street lighting.
- Also within the compound will be electrical infrastructure such as the Transformers, Switchgear and control equipment required to facilitate the export of electricity. 'The Transformers associated with the 132kV Substations will either be single or dual'
- The equipment will have a maximum height 7m (23ft) to the top of the busbars.

Concerns

Visually, the size and height and bulk of this construction would completely dominate the landscape. The substation would sit central to hundreds of repetitive 4.5m(14.75ft) black static or tilting solar panels, all surrounded by 2.5m (8ft) 'deer fencing', covering the remaining 50 hectares on 7F to the north, east and west and a further 40 hectares on 7D across a road to the west. Cumulatively, this is industrialisation on a huge scale all within view of properties along Saxlingham Green.

The substation will be lit 'the lighting of the Project Substations… would be in accordance with health and safety requirements, particularly around any emergency exits where there would be lighting, similar to street lighting that operates from dusk. All lighting would seek to limit any impact on sensitive receptors through the implementation of standard good practice measures'. 4.3.31

There will also be motion sensing lighting will be implemented in the … Project Substations and other critical electrical infrastructure to be used only for maintenance and security purposes. 4.3.32

So, although fields of solar panels do not need light, in the case of 7F there will be artificial light coming from the substation in an area where there has never been artificial light, dramatically creating light pollution in an area of particularly dark skies.

Apart from light pollution affecting the residents of Saxlingham Green and illuminating an industrial site, artificial light (and whatever minimisation/mitigation is implemented it will not, for obvious reasons, reduce this to nothing) will have a severe impact on the barbastelle bats that flourish in the area.

Natural England's 2024 Definition of Favourable Conservation Status for barbastelle makes clear that barbastelle are a vulnerable, light-shy Annex II species closely associated with broadleaved woodland, veteran and dead trees, riparian habitats, hedgerows and treelines; that they avoid artificially lit areas, depend on large, well-connected dark landscapes, and that there is currently no known proven mitigation or compensation for loss of barbastelle woodland roosting habitat over the short to medium term. Natural England further states that existing and potential roost sites should be protected from disturbance and development, and that artificial lighting fragments habitat and impairs connectivity between colonies.

This has not been properly addressed in the submission. Bat boxes, 'considered' under 4.3.21, are not a solution.

Noise and Vibration The appendix states that transformers generate a 100 Hz hum due to vibration of the transformer coil but then dismisses this as not significant. But this substation is based in a very quiet part of the scheme with little background noise and so any noise is likely to have more impact; in very low-background rural conditions, even moderate plant noise, fan noise, transformer hum, inverter noise, HDD activity, piling or construction traffic will be intrusive.

This has been pointed out by South Norfolk Council who have disputed the operational thresholds and acceptability case saying that operational noise should be at background level or below and that conclusions could not be assessed whilst details of the substation remain to be fixed.

In addition, bats are extremely sensitive to noise, not least construction noise, but also background noise which affects their echolocation abilities, foraging behaviours and social communication. This seems not to have been properly addressed in the submission.

Public rights of way will be affected The substation itself is bordered to the west and south by public rights of way and site 7F, in which it sits, is surrounded by a number of currently well used footpaths.

The construction process of the substation (and panels), along with the environment it creates is likely to deter purely recreational walkers and visitors from using footpaths, which in in any case, for safety reasons, will be either closed 'Medium -term' or 'Open but Managed' as a consequence of construction work and vehicle movements.

Once operational the combination of low noise from the transformer, inverters etc, which will be heard from footpaths running beside the substation, combined with the fencing and industrialisation of the landscape are likely to be a further deterrent but to all who have to use the paths – which include direct walking routes to the facilities in neighbouring Hempnall - the substation will dominate the view experience and degrade the experience.

Although mitigation planting is proposed it seems likely that the substation will remain visible from afar (footpaths Hp-FP3 and Hp-FP5) and near: 'At year 15 the proposed mitigation would be fully established and would screen *the majority* of the proposed elements. It is however likely that the substation would remain visible to some degree' (SN-FP27 Appendix 7.9: Public Rights of Way Visual Amenity Assessment)

The remnants of the substation may be left in situ after decommissioning. The submission provides two possibilities concerning what will happen to the base of substation at decommissioning, depending on how it has been constructed which, like many aspects of this scheme, has not yet been fully concluded.

'Depending on the ground conditions' the 132kV Project substations will have either a raft foundation or piles to a maximum depth of 10m below ground level with a 1m pile cap. 15.8.50

This structure may be permanent – ‘The works are likely to be temporary and reversible, which would be a ‘low magnitude impact’… ‘It is considered likely that the works will be long-term temporary and fully restorable, which would be ‘low magnitude effect’ ‘on resources of high, medium and low sensitivity … resulting in an effect of minor adverse significance. 15.8.49

Alternatively – ‘Taking a worst-case assessment, therefore, the impacts are treated as permanent. The permanent loss of 5.6 ha of BMV land would, in isolation, be an impact of low magnitude (Table 15.5) on resources of high, medium and low sensitivity (Table 15.4), resulting in an effect of minor adverse significance, (Table 15.6), which is not significant. 15.8.50

Comments

1/ There is Inconsistency in terminology in different chapters between ‘Project Substation’ and ‘Substation’. 7F is referred to as a Project Substation in ‘Agricultural Land’ (chapter 15) and ‘Noise and Vibration’ (chapter 12) and in other chapters as ‘Substation’ compared to others which are ‘Project Substations, eg Bess Project Substation.

2/ There seems to be no definitive description/specification of this individual substation: ‘Substations comprise electrical infrastructure such as the Transformers, Switchgear and control equipment required to facilitate the export of electricity. The Transformers associated with the 132kV Substations *will either be* single or dual’ (Substations (Work No. 3) 4.3.32)

There is also no definitive picture of what it will look like, other than maximum dimensions, and ‘*an example* of a 132kV substation is shown in image 4.8 below’ (Substations (Work No. 3) 4.3.32)

3/ Appendix 4.1 provides ‘illustrative technical information’ but surely at this stage it should be possible/required to accurately describe and state the specification all the major infrastructure including this particular substation stating exactly what it will look like in this particular setting, what it will contain, how it will be accessed and constructed and how much removal of existing trees and hedgerows will occur.

Otherwise how is it possible to measure or comment on visual impact, noise, safety, impact on the land and wildlife etc?

5/ The document also doesn’t make clear how long construction of this substation will take or whether it will happen in conjunction with other work in the vicinity, such as the construction of access roads, the construction of the work station on 7D, piling for the panels. This is Important because the sequence and conjunction of construction will have a major cumulative impact on noise, vibration, local road disruption etc in the local area.

6/ And, as a general point, the submission is often very hard to access (particularly the ‘Works’ section), navigate and understand. This scheme proposes a massive and widespread industrialisation of gentle and tranquil countryside that has little changed in centuries and there should be a major responsibility on the part of the applicant to provide transparent communication and clear documentation provided to the thousands of residents who be affected and who will have to live with the consequences of it being given the go ahead for generations to come.

7F is bordered by an ancient woodland (Saxlingham Grove) which is a designated SSSI and is a known Barbastelle bat maternity locality.

The land parcels are a mixture of grazing pasture and arable and are also currently under countryside stewardship subsidy.

The area has numerous long established hedgerows and mature boundary trees. Its topography is typically flat with far reaching views, therefore making the installations even more unsightly to nearby residents and walkers. No amount of mitigating hedgerow planting will reduce the visual impact for several decades. Even when the new hedgerows reach maturity, when tall enough to obscure the solar panels, the current open landscape will be transformed into compartmentalised sections and alleyways by the high security fencing and hedging.



A view over the meadows from the footpath along the boundary between Hempnall and Saxlingham east of Broaden Lane. All of these meadows (as far as the eye can see) would be covered by solar panels and these large meadows are merely a small part of the total scheme area.


7F



The green is lined with many ancient trees. The unclassified road measures between 3 and 3.5 metres wide. Above is a photo of a line of historically important Horse Chestnuts at least 200 years old. Grid ref: TM2451 9657

Saxlingham Nethergate 7D, 7F The construction of **permanent concrete substation infrastructure** on heavy clay soils creates a **direct and irreversible contamination pathway**.

Chapter 6: Climate Change

The EIA fails to provide a robust, site-specific assessment of the scheme's resilience to climate change and the potential for the development itself to exacerbate local climate risks.

There is no quantification or modelling of how the extensive area of solar panels may increase surface water runoff, exacerbate flash flooding, or alter groundwater recharge, particularly in light of climate projections for more intense rainfall events.

Nor does the EIA 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.

The absence of a detailed local climate risk assessment and adaptation strategy falls short of best practice and EN-1 requirements for demonstrating that both the project and surrounding communities will not be made more vulnerable as a result of the development.

The heavy clay soils and flat topography make much of Plot 7 prone to surface water flooding.

Revised climate goals and an accelerated drive to deliver clean power by 2030 in the UK have served to advance larger solar farm expansion as a relatively risk-free straightforward element in the climate change portfolio supporting mitigation by producing low-carbon energy (Department for Energy Security & Net Zero, 2025).

However, solar farms change soil/plant interactions which will counteract some of its climate mitigation effects due to carbon and nitrogen losses to the atmosphere (Luuk Scholten, 2025). Indeed, there is an increasing body of evidence that large-scale developments, such as that proposed here, require far greater detailed planning to mitigate against harm to the delicate, discreet local ecosystems that may result in land degradation, biodiversity loss, and/or soil contamination, within the lifetime of the project. (Luuk Scholten, 2025; Alona Armstrong, 2024).

Further, this acknowledged biodiversity and ecosystem system complexity, advances the 'integration principle' whereby a balance should be sought between clean growth and environmental protection in any proposed adaptation or mitigation imitative (Trudie Dockerty, 2024; Department for Energy Security & Net Zero, 2025).This principle must necessarily influence both structure and composition and also the monitoring and ongoing management of these larger infrastructural developments. Proliferation of the earlier, rudimentary 'cut and paste' initiatives will simply no longer serve, particularly in the wider context of climate change (Trudie Dockerty, 2024).

There is a growing body of expertise (both national and international) across all the key elements here that can support the necessary reengineering of these earlier outdated initiatives, to more closely balance the demands of carbon free energy with biodiversity and ecosystem requirements (Department for Energy Security and Net Zero, 2024). This will of course require greatly enhanced engagement, energy, and innovation and from all the key players here and ultimately perhaps a significant redraft/resubmission if the project once fully understood and balanced accordingly, remains viable

In brief, vital elements noticeably absent in the current EIA include,

- A robust, site-specific assessment of the scheme's resilience to climate change and the potential for the development itself to exacerbate local climate risks alongside action/options to mitigate

- There is no quantification or modelling of how the extensive area of solar panels may increase surface water runoff, exacerbate flash flooding, or alter groundwater recharge, particularly considering climate projections for storm intensification
- With global temperatures forecast to increase in a range from 1.5°- 4°C by 2050, heatwaves will become more common. Increased heatwaves will affect solar productivity - PV panels decrease in efficiency by 0.3% - 0.5% per PV panel temperature degree increase above 25°C.- this is neither acknowledged nor implications to yield/viability explored (Alona Armstrong, 2024)
- The potential of the introduction of large-scale hard infrastructure leading to localised overheating, changes in wind patterns, or drought vulnerability affecting adjacent farmland and communities is likewise unexplored.

A comprehensive mapping of the ecosystem variants across the project's footprint, to support preservation and to identify restorative opportunities in biodiversity and ecosystem services.

Land management practices within solar farms can have both positive and/or negative impacts on hosting ecosystems e.g. **Agrivoltaic systems addressing both ongoing food production and ecosystem health. Developing these requires a full, thorough understanding of the area under consideration**

The absence of a detailed local climate risk assessment and adaptation strategy alongside a comprehensive biodiversity and ecosystem services review in the EIA here, falls far short of best practice and indeed the EN-1 requirements for demonstrating that both the project and surrounding communities will not be made more vulnerable because of the development.

References:

Alona Armstrong, F. C. (2024). Integrated Policymaking is Needed to Deliver Climate and Ecological Benefits from Solar Farms. *Journal of Applied Ecology*.

Department fo Energy Security and Net Zero. (2024). *Strategic Spatial Energy : Commission to the National Energy System.* London : Gov.uk.

Department for Energy Security & Net Zero. (2025). *Solar Road Map : United Kingdom Powered by Solar .* London: Gov.UK.

Luuk Scholten, R. G. (2025). Sharing the light, impact of solar parks on plant productivity, soil microbes and soil organic matter. *The New Phytologist* .

Trudie Dockerty, A. L. (2024). *Infrastructure Transformation for Net Zero: Environmental Risks.* UKERC Working Paper.

Site 7 is currently a Climate Change Vulnerability Buffer area (MAGIC msp). East Pye Solar has provided no information about how their proposal will impact that status or what effect removing its status will have.

Site 7 is edged and contains ancient and historic hedgerows as well as trees recognised by The Woodland Trust as Veteran and Notable. With the planned removal of many of these hedgerows in order to gain access to Site 7 as well as internal construction within the Site, East Pye Solar have not supplied any calculations on the loss of this important carbon storage mechanism when compared to the proposed replanted newer hedge. Whilst it is recognised that younger plants in the years between 6-12 years old absorb and sequester more carbon than established mature hedges, it has not taken account of the large carbon quantities that have already been locked in both the plant and the soil by the mature vegetation and that by removing these established hedgerows will release that trapped carbon. Calculations based on the estimates of rates of Carbon uptake and storage of younger plants compared to mature hedging put the time span for a replacement young hedge to balance the loss of carbon capture and storage in the plants and the soil by the mature hedge at 60 to100 years.

(Sci Total Environ 2023 Sep 20:892:164482. doi: 10.1016/j.scitotenv.2023.164482. Epub 2023 May 29. Planting hedgerows: Biomass carbon sequestration and contribution towards net-zero targets Sofia Biffi, Pippa J Chapman, Richard P Grayson, Guy Ziv,; Hedgerows increase soil carbon storage by 40%, study finds https://phys.org/news/2025-02-hedgerows-soil-carbon-storage.html; https://8point9.com/unlocking-the-carbon-drawdown-potential-of-hedgerows/)

Site 7 is a current Climate Change Vulnerability Buffer area and as such it has been managed in a way in order to increase the resilience against the impacts of climate change by providing habitat corridors not only for smaller species but larger ones such as of Red and Roe deer who have been seen regularly crossing Site 7.

As part of this scheme, Site 7 has been managed to support long term biodiversity and ensure that wildlife habitats that have been connected for centuries remain so. Hedgerows have been maintained and encouraged, with wide margins left between planted crops and the boundaries as well as the natural watercourses that feed into the River Tas have been protected.

The Draft Development Consent order (APP/3.1) March 2026 Section 11, Part 1 and Part 2 (Removal of Hedgerows and Removal of Important Hedgerows) lists vast swathes of hedgerows across the scheme planned for removal. However what isn't clear is exactly how much of , for example, *'part of 688m of section 67 on Sub-site 7D'* is actually to be removed. This vagueness will lead to catastrophic loss to established and important hedgerow as the Developer will have carte blanche on how much is removed. This vagueness is applied across the Scheme and the length of hedgerow will be tens of kilometres.

CRC8-335	Removal of part of approximately 119m of hedgerow within the area identified by a dark green line on sheet 13 of the hedgerow and tree protection order plan
CRC8-294	Removal of part of approximately 192m of hedgerow within the area identified by a dark green line on sheet 13 of the hedgerow and tree protection order plan
S-7D-67	Removal of part of approximately 688m of hedgerow within the area identified by a dark green line on sheet 10 of the hedgerow and tree protection order plan
CRC8-346	Removal of part of approximately 100m of hedgerow within the area identified by a dark green line on sheet 13 of the hedgerow and tree protection order plan
CRC8-287	Removal of part of approximately 274m of hedgerow within the area identified by a dark green line on sheet 13 of the hedgerow and tree protection order plan
S-4A-140	Removal of part of approximately 147m of hedgerow within the area identified by a dark green line on sheet 17 of the hedgerow and tree protection order plan
S-5A-62	Removal of part of approximately 248m of hedgerow within the area identified by a dark green line on sheet 16 of the hedgerow and tree protection order plan
CRC11-336	Removal of part of approximately 111m of hedgerow within the area identified by a dark green line on sheet 12 of the hedgerow and tree protection order plan
CRC8-297	Removal of part of approximately 432m of hedgerow within the area identified by a dark green line on sheet 13 of the hedgerow and tree protection order plan
CRC6-302	Removal of part of approximately 193m of hedgerow within the area identified by a dark green line on sheet 14 of the hedgerow and tree protection order plan
S-3B-8	Removal of part of approximately 286m of hedgerow within the area identified by a dark green line on sheet 15 of the hedgerow and tree protection order plan
CRC1-272	Removal of part of approximately 257m of hedgerow within the area identified by a dark green line on sheet 24 of the hedgerow and tree protection order plan

In addition to the vagueness, if the Developer doesn't know how much significant hedgerow is being removed how can they calculate biodiversity net gain?

Chapter 7: Landscape and Visual



There is no statutory landscape designation covering Site 7, ie National Parks nor are there any within 5km.

The Broads National Park is 6.4km north east of sub-site 7L.

The closest settlements and affected parishes are Tasburgh, Hempnall, Saxlingham Nethergate, Shotesham and Woodton, with Long Stratton a developing town 2km from sub-site 7A.

However there are residential properties located outside of these that are located closer to Site 7.

The nearest are as follows:

- 150m west of 7A
- 500m west 7B
- 25m and 50m south of 7C
- 30m north 7D
- 120m north east 7F
- 15m and 130m east 7L

The South Norfolk Local Landscape Designation Review 2012, identifies the parish of **'Tasburgh as A1 Tas Rural River Valley' and 'B1 Tas Tributary Farmland'**. Full information can be found in the Tasburgh Data Profile.

The description of A1 Tas Rural River Valley is:

Location and Boundaries:

- The Tas Rural River Valley runs in an approximately south to north direction through the heart of the Norwich Policy Area from Tasburgh in the south to the Norwich Southern Bypass in the north.
- Most of the character area is within the Norwich Policy Area with a small part extending to the Rural Policy Area.
- The boundaries are defined topographically, in relation to the top of the valley sides and roughly follow the 30m contour, except where human influences have caused a distinct change in character. For example, in the lower part of the valley the A140 defines the boundary on the west side as the road creates a clear division on the upper valley side.

The key characteristics of the Tas Rural River Valley are:

- Distinct, moderately wide simple valley form with medium-scale clearly defined flat valley floor, shallow side slopes and adjoining smaller-scale tributary valleys.
- Less enclosed than some other valleys with a feeling of exposure and openness and some long views within the valley but restricted external views.
- River alternately visible and hidden marked by sparse waterside vegetation including reed filled ditches and narrow woodland belts. The flat, wide, green valley floor is a distinctive feature.
- A large number of attractive fords and small bridges occur at regular intervals along the river and side tributaries.

- Pastoral valley floor with cattle grazing and distinctive willow pollards lining the water courses on the valley floor.
- Upper tributary valleys of great ecological richness and importance, including areas of fen, marsh and unimproved wet and neutral grassland.
- Fragmented woodlands and shelterbelts on the valley sides creating a wooded fringe to much of the valley interspersed with more open areas of arable land.
- Presence of historic earthworks including Scheduled Ancient Monuments, including the large highly visible defensive earthworks of Venta Icenorum and the earthworks at Tasburgh.
- Sparsely settled character with buildings clustered around fording points and at the top of the valley sides.
- Characteristic vernacular buildings particularly notably including weatherboarded mill houses and Dutch gable ends.
- Presence of a small number of distinctive halls and parkland including English Heritage listed parkland at Rainthorpe Hall.
- Network of narrow peaceful rural lanes throughout the valley including sunken lanes.
- A more disturbed character in the north of the area due to the influence of pylons, railway and roads.
- Role in dividing and defining east and west of South Norfolk District.

The description of B1 Tas Valley Tributary Farmland including Site 7 is:

Location and Boundaries:

Most of Site 7 is considered Best and Most Versitile (BMV) with some of the site grade 2 >60% with the remainder of moderate likelihood at 20-60%

- The Tas Tributary farmland is a large area of land encompassing the Tas River Valley character area.
- Located in the heart of South Norfolk, it lies at an elevation of between about 30m AOD and up to 50m AOD.
- The character area is bounded to the north, south and west by surrounding Plateau areas.
- To the east the character area adjoins Chet Tributary Farmland and Waveney Tributary Farmland.
- The character area lies within the Rural Policy Area with a small portion to the north lying within the Norwich Policy Area.

The Key Characteristics of the Tas Tributary Farmland are:

- Open, gently undulating to flat and sloping landscape incised by shallow tributary valleys, the tributary streams of which are not prominent landscape features.
- Large open arable fields of cereal, sugar beet and occasionally sweetcorn.
- Framed open views across the countryside and into adjacent character areas.
- Small blocks of deciduous woodland of high ecological and visual quality. These create wooded horizons which add variety to and create intimacy within the landscape.
- Damp grasslands of ecological importance located within the tributary valleys.

- Scattered remnant hedgerow trees, particularly oak, sometimes including intact avenues lining the roads or marking former, denuded, field boundaries.
- Transportation corridors including main connecting roads.
- Network of recreational footpaths.
- Ditches, low banks and wide grass verges associated with the network of rural roads.
- Settlement characterised by a small number of large villages including... Long Stratton - with smaller hamlets, scattered farmhouses and agricultural buildings.
- Mixed vernacular of timber-frame, stepped and Dutch Gables, thatch and round-towered churches.

Site 7 lies within the South Norfolk and High Suffolk Claylands National Character Area (NCA), which occupies a large area of central East Anglia, stretching from just below Norwich in the north, down to the river Gipping in the south. The Claylands area is a relic of glaciation from about 480,000 years ago.

This area is a predominantly flat clay plateau that dominates the character of the NCA. The plateau is incised by numerous small-wooded river valleys. These river valleys contain an important mosaic of small-scale pasture, wet heath, reed beds and woodland that provide ecological connectivity into the heart of the claylands. It is mostly an ancient, long-settled landscape, and above all this is farming country, with a strong utilitarian and rural character, evoked best in its ancient irregular field patterns that are still discernible over much of the area. It is also characterised by its medieval churches, historic timber-framed barns and houses with colour washed walls and thatched or tiled roofs.

Norfolk Wildlife Trust is actively involved in a project to restore and improve wildlife habitats in the area (ref: Restoring the Claylands by Prof, Tom Williamson, University of East Anglia).

The earliest document relating to the village is the will of Wulfgyth dated 1046 leaving land in Saxlingham to her daughters. Parts of the church are dated from C11. Saxlingham Nethergate is a ‘tail’ shape leading down to The Green and currently home to approximately 700 residents.

Key Characteristics:

• Conservation area divided into three distinct parts with three greens

• Situated across the valley of a minor stream

• Developed as a linear settlement along the line of the stream

• Strong natural character with dense woodland to the east side (including Saxlingham Grove SSSI)

• Mature hedgerows and low brick/flint walls at front boundaries are key features

There are a total of 280 dwellings. There are 42 grade II listed buildings, of which 38 are dwellings. This is 13.6% of dwellings being grade II or Grade II*. Many of these listed buildings line the

narrow unclassified road through the village (under 5 metres wide) and onto The Green where the road narrows further to measure 3.5 metres wide. Deep culverts and ancient walls run along the side of the road.

The Conservation Area sits within a typically attractive Norfolk arable landscape. The proposed panels in sites 7D and 7F will radically and adversely change the landscape setting of the Conservation Area demonstrating that the applicants have not paid any regard to the statutory duty imposed by section 72 of The Planning (Listed Buildings and Conservation Areas) Act 1990 that "…special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area…"

The grade II listed war memorial stands in the middle of the village at the junction of The Street and Pitts Hill. It was designed by FW Troup, unveiled in 1921, dedicated to the fallen and survivors of the 1st world war.

Drone illustrating narrow road heading west towards the green and corner of the war memorial (courtesy of Lockwood Chartered Surveyors).



Drone picture looking west showing sharp right hand bend at the war memorial



Land parcel 7B borders the southern side of Fairstead Lane and slopes down into the Hempnall Beck river valley, extending to within 15m of the Beck. Hempnall Beck feeds into the River Tas, an environmentally sensitive chalk stream.

Site 7B is currently arable farmland with pheasant cover strips and 10m field conservation margins.

The land is classified as having a slightly acid loamy and clayey soil with moderate to high fertility and as a result is valuable arable land, vital for the country's food security.



Fairstead Lane is a narrow single lane road extending from A140 in the west to Hempnall village in the east. At no point does it widen so 2 cars can pass. In places grass grows down the centre of the lane. It is mostly enjoyed by walkers, dog walkers and joggers as part of their daily routine as it offers immediate access to the countryside from the centre of the village, irrespective of weather conditions. Hence is popular with all age groups. The lane is also regularly used by horse riders and cyclists on account of the paucity of vehicles.



Proposed solar fields 7C and 7B lie directly opposite each other with the narrow Fairstead Lane dividing the two land parcels. This juxtaposition of solar fields creating a corridor of panels would completely change the landscape beyond recognition, accentuated by the fact the land naturally slopes south into the river valley. The solar panels in 7B would obliterate the view of the river valley whilst panels in 7C would tower over the Lane, being at a higher elevation to the Lane. This would totally industrialise the rural character of the area. The sweeping open views over arable fields delineated only by ancient hedgerows would be replaced with a narrow channel between two rows of towering solar panels. This would be quite overwhelming and the invaluable asset this Lane offers to peoples lives would be eliminated.



This loss would be further exacerbated by the scattered nature of the proposed solar scheme meaning that every footpath and road radiating from Hempnall will have a solar field either adjacent to it or within eyesight. This has the potential to have a dramatic effect on the sense of wellbeing and physical and mental health of the local community.

Chapter 8: Ecology and Biodiversity

Overview

The South Norfolk Claylands

The area is part of the National Character Area 83 South Norfolk and Upper Suffolk Claylands which have been managed to keep their own particular character, where pockets of relatively well preserved countryside have survived.

The local landscape has distinctive characteristics different from other parts of Norfolk.

These have arrived as a result of the way that people have interacted with the natural environment over centuries. These characteristics allow a **sense of place that is intimately bound up with the character of the countryside.**

The unique landscape has been subject to land management changes with increased development having a detrimental effect on the wildlife and the vital habitats that it depends upon.

Sites 7 falls into the South Norfolk Claylands.

The construction of solar arrays across Site 7 plus a 132kV substation on 7F, multiple access points across all twelve sub sites and an internal haulage route from sub-site 7A - 7F, 7G-H, 7I-J and 7K-L will all have a detrimental effect on the character and wildlife.

The Cable Route Corridors (CRC11, CRC12, CRC10, CRC8, CRC7) joining sub-sites together as well as to other sites across the scheme including under the Hempnall Beck a tributary of the river Tas. The patchwork fields act as wildlife corridors and habitat, each surrounded by mature hedgerows and tree lines, all quite typical of the topography in the area. These fields support much wildlife, fairly undisturbed, including herds of native deer, hares, redlisted birds, badgers and endangered bats.

Dark Skies

Norfolk is one of England's most rural counties and its rural landscapes and big skies and dark skies are a defining part of this rural character, deserving protection. Yet this special quality is under threat. Light pollution is caused by poorly designed or unnecessary light shining tastefully where it is not needed and it is increasing (CPRE Norfolk).

Much of the area for the East Pye Solar Scheme, away from settlements, are some of the darkest skies in Norfolk. Many people visit the area to star gaze and the Northern Lights are regularly photographed from the area. Dark Skies support many nocturnal animals including multiple bat species, in particular the endangered and protected Barbestrelle bat.

The lighting of compounds and construction areas as well as security lighting surrounding substations will have an cumulative impact to the Dark Skies across the area.



Northern Lights with the moon and stars across the East Pye Solar proposed scheme (photograph by [redacted])

If the Scheme was consented, this picture would have the Cabling Compound 2 200m away in the foreground, with 132kV Substation and Sub-site 4B to the centre right and Sub-site 4A with the holding compound below the crescent moon (centre left). Site 7 would be to the right of the picture.



Northern Lights across land proposed for East Pye Solar (photograph by [redacted])



Comet Lemmon across the skies of Site 7 (courtesy of [redacted])





Perseid Meteor shower over Site 7 (courtesy of [redacted])

The **serotine bat (nephaeus serpentinus)** has been recorded as being present on Site 7 and this is a species that has declined in many areas of its European range. Loss of feeding habitat is thought to have played a part in this. It is highly vulnerable to disturbances from construction work and toxic timber treatments.

They have three main feeding strategies: short flights, ground feeding and aerial hawking. It normally forages quite low, 0-5m above the ground. In the UK serotine bats benefit from a very comprehensive level of legal protection.

All bird species will be disturbed by this level of intrusion into their habitat.

Site 7 lies within an area of Habitat Restoration-Creation (East Pye Solar EIA scoping report 01/25)

Groundsure
LOCATION INTELLIGENCE

Long Stratton

Ref: GSIP-2024-16319-20839_A
Your ref: East Pye Solar
Grid ref: 625678 294876

13 Habitat designations



Site Outline

Search buffers in metres (m)

Priority Habitat Inventory
Open Mosaic Habitat
Limestone Pavement Orders

Habitat Networks
Primary Habitat
Restorable Habitat
Associated Habitats
Habitat Restoration-Creation
Network Enhancement Zone 1
Network Enhancement Zone 2

13.1 Priority Habitat Inventory

Records within 250m	240

Habitats of principal importance as named under Natural Environment and Rural Communities Act (2006) Section 41.

Features are displayed on the Habitat designations map on page 261 >

ID	Location	Main Habitat	Other habitats
1	On site	Coastal and floodplain grazing marsh	Main habitat: CFPGM (INV > 50%)
2	On site	Coastal and floodplain grazing marsh	Main habitat: CFPGM (INV > 50%)
3	On site	Deciduous woodland	Main habitat: DWOOD (INV > 50%)

The State of Nature report shows that much of the wildlife in the UK is in serious trouble:

- 1,500 species are now at risk of being completely lost.
- 43% of birds,

- 31% of amphibians and reptiles,
- 28% of fungi and lichens
- 26% of land mammals (State of Nature Partnership 2023).

Many threatened birds with declining numbers are found across the surrounding farmland surrounding Long Stratton, in hedgerows, wooded areas and ground nesting.

Red Listed Birds:

- Lapwing
- Swift (nesting)
- Linnet
- Fieldfare
- Grey Partridge
- Skylark
- Greenfinch
- House Sparrow
- Mistle Thrush
- Herring Gull
- Turtle Dove
- Yellow Hammer
- Starling
- Spotted Flycatcher

Amber listed Birds:

- Wood Pigeon
- Tawny Owl
- Rook
- Wren
- Song Thrush
- Bullfinch
- Sparrow Hawk
- Kestral
- Mallard
- Stock Dove
- Moorhen
- Black-headed Gull
- Common Gull
- Common Whitethroat
- Redwing
- Dunnock

Gamebirds including grey partridge and pheasants are known to nest in the area and are used for game shooting events by the land owner of Site 7.

Yellow wagtails often nest in ground-level grass in damper areas, meadows and agricultural fields.

All wild birds and their nests are protected under the Wildlife and Countryside Act 1981 which makes it illegal to intentionally damage or destroy an active nest.

East Pye Solar intends to build on this type of breeding habitat and construction will take several years. Therefore the birds breeding sites will be destroyed and disturbed. This cannot be mitigated against.

Many mammals are resident across these sites including:

- Red deer
- Roe deer
- Muntjac
- Chinese Water Deer
- Hare
- Barbestrelle Bats
- Pipistrelle Bats
- Soprano Bats
- Natterers Bats
- Brown Long-Eared Bats
- Hedgehogs
- Stoats
- Weasles
- Otters in the Tas
- American mink
- Mole

Sub-Site 7B has a northern boundary with the Hempnall Beck, a tributary of the river Tas. Numerous tracks can be observed running alongside and radiating away from Hempnall Beck indicating that this corridor is a vital passageway for wildlife probably migrating back and forth from feeding and bedding areas.

Red deer, barn and tawny owls, kingfishers and bats are all abundant in this area. Otters can be found in the Hempnall Beck.



Wildlife tracks along river corridor



Wildlife tracks radiating from Hempnall Beck up to Land Parcel 7B. The tree in the photo is 1 metre from edge of 7B.

During the construction of the solar fields and establishment of cabling and associated haulage routes off the A140, there would be complete destruction of the environment both physically and from noise and vibration; arable fields and hedgerows being replaced with fencing, concrete and steel framework. Without doubt the change to the landscape and the wildlife population, no matter how big the mammal or how small the invertebrate, would be significant.

Even once the solar panels are installed, the ongoing disruption to the environment, the loss of safe wildlife migration routes, especially down to the beck and along hedgerows and field margins,

plus the loss of feeding and bedding areas would result in a significant impact on wildlife and the biodiversity of the area. It is very unlikely the ecological value of the area would ever recover.



Wildlife tracks from 7C over Fairstead Lane to 7B and Hempnall Beck

8.1 Barbastelle Bats

Land Parcel 7 lies within a **Core Sustenance Zone (CSZ) for Barbestrelle Bats**, linking it functionally to confirmed and likely maternity colonies within the wider Easy Pye landscape. CSZ land is essential for foraging, commuting and maintaining breeding success.

The proposed development would introduce:

- Extensive arrays and fencing;
- lighting, CCTV and inverter infrastructure;
- prolonged construction disturbance;
- loss and fragmentation of functionality linked habitat.

On this basis, **disturbance or damage to breeding and resting places cannot be excluded,** and the works would be **likely to require a European Protected Species licence**. The application provides **no lawful assessment of licence need or grantability**, and no evidence that the statutory tests (including maintenance of favourable conservation status at landscape scale) could be met.

Given the **cumulative CSZ overlap across multiple parcels**, this represents a **front-loaded legal constraint** rendering Land Parcel 4 **undeliverable in principle**.

Where a proposed NSIP is located wholly within overlapping Core Sustenance Zones for barbastelle bats and directly adjacent to multiple ancient woodlands supporting maternity colonies, the impacts of construction disturbance, habitat fragmentation, lighting, noise and long-term landscape disruption are **intrinsic to the scheme** and **cannot be reduced to a level that avoids adverse effects on the local barbastelle population's favourable conservation status**.

As such, the effects are **not capable of mitigation**, and the scheme is fundamentally incompatible with the Habitats Regulations.

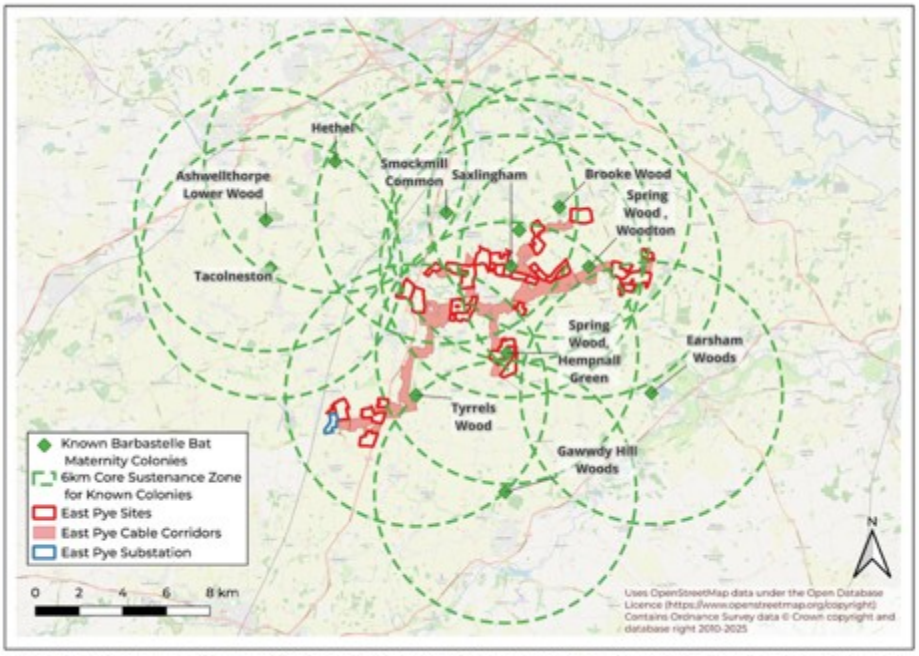


Figure 1. Core Sustenance Zones of Barbastelle Maternity Colonies within or close to the East Pye Solar Scheme Area

The Barbestrelle Bat is distinctive, elusive and very rare with big ears that meet in the middle and a flat pug-like nose. They live in deciduous woodland and like to hunt in wet woodland and meadow areas and environment very significant to that across the East Pye Solar Scheme.

Barbestrelle bats enjoy a diet of moths, midges and beetles, which they hunt at night using echolocation. They hunt in a variety of habitats, particularly over water, and have a quick and skilful flight.

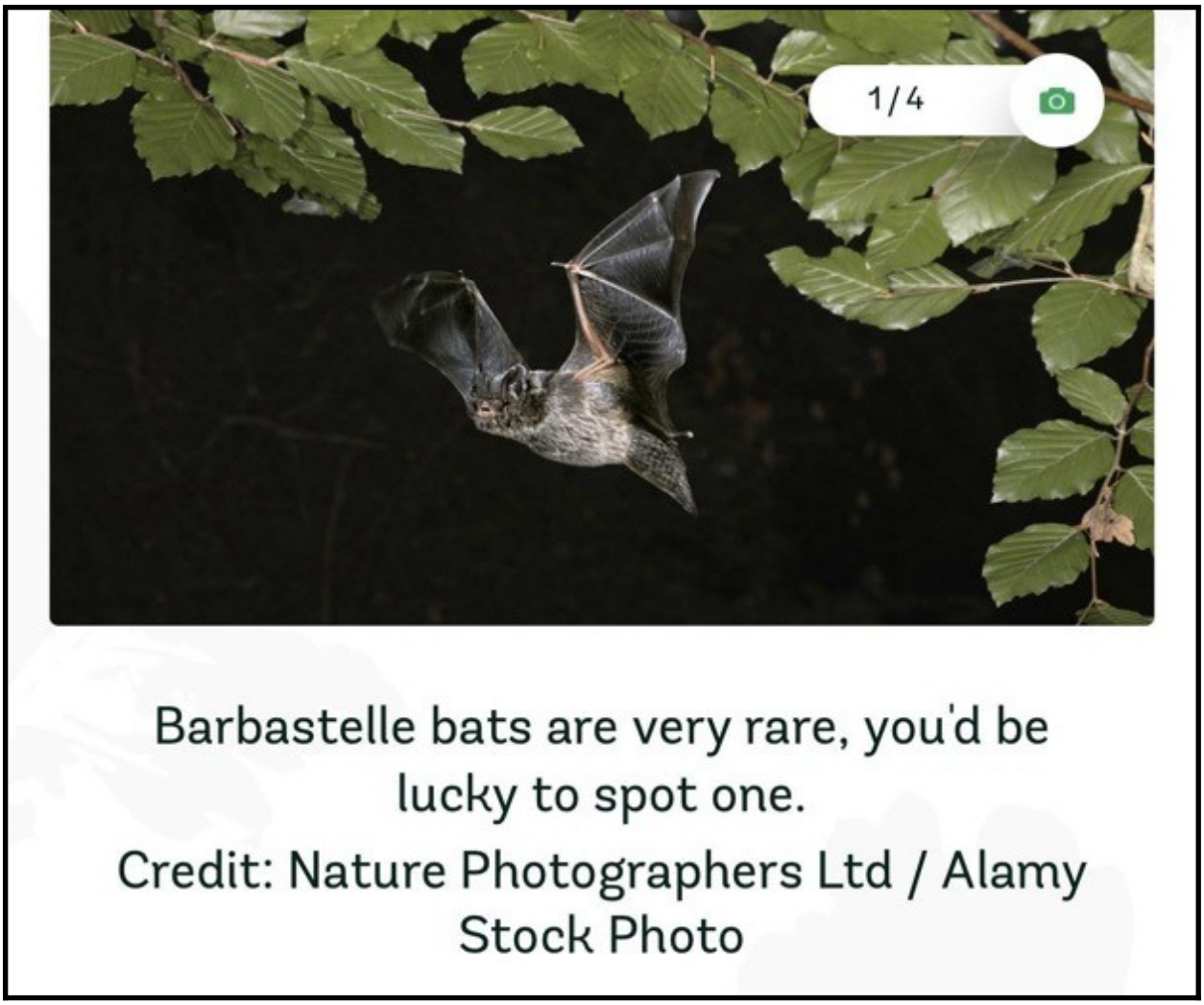
Echolocation is a way of sending out an acoustic call towards a smooth surface, like a pond, the sound bounces off the body of water. A new study in the UK has detailed how bats are confusing the smooth surfaces of solar panels for bodies of water.

With the tracking panels being at 0 degrees (horizontal) at night as they reset themselves this could be catastrophic for the colonies of foraging maternity bats.



They breed in the autumn although pregnancy is delayed until the rolling spring when nursery roosts and maternity colonies are formed. These usually consist of around 10-20 females and typically give birth to one or two pups in July.

Barbestrealle Bats hibernate in the winter months often in old buildings and holes in trees. During mild spells they may head about to forage.



They live in deciduous woodland and areas with water, like woodland streams and ponds.

Barbestrells Bats are incredibly rare and protected under the Wildlife and Countryside Act 1981. The also listed as Near Threatened globally on the IUCN Red List. They are thought to as few as 5,000 in the UK.

South Norfolk is incredibly significant for Barbestrelle Bats because it sits within a UK stronghold for this critically endangered, near-threatened mammal. There are twelve known maternity colonies surrounding and across the East Pye Solar Scheme each with a 6km Core Sustenance Zone radius for foraging. The region's mosaic of ancient woodlands, traditional hedgerows and quiet river valleys of the Claylands provides vital foraging and maternity habitats.

The Norwich Bat Group studied one of the maternity colonies at Tyrrels Wood adjacent to CRC4 and 500m from Site 2C, managed by the Woodland Trust which is also part classified as 'ancient'. It is the home to 15 roosts. The Norwich Bat Group were able to radio-track 11 females within the roosts. Four females foraged to the east, three to the west, crossing the A140. Three bats remained within 3km of the wood.

The 6km Core Sustenance Zones for Barbestrelle Bats overlap each other and cover the whole of the Scheme Order Limits including Site 7.

Based on Bat Activity Survey Report - East Pye Solar - Planning Inspectorate, Sub-site 7C and 7B of the East Pye solar project is adjacent to an off-site woodland block and near Hempnall Beck, which hosts associated woodland habitats. These habitats are considered significant for supporting five different species of bat, including barbastelle.
nsip-documents.planninginspectorate.gov.uk
Key ecological features for include:

- **Adjacent Woodland:** Provides critical habitat connectivity.
- **Hempnall Beck Woodlands:** Provides potential tree roosting opportunities.
- **Species Diversity:** Site 7C showed a higher number of potential emergence registrations for bats compared to other survey areas. nsip-documents.planninginspectorate.gov.uk

Bat Activity Survey Report - East Pye Solar - Planning Inspectorate showed Sub-Site 7C had a higher number of potential emergence registrations than the other survey areas.

This cannot be mitigated against and is a FATAL Flaw.

8.2 Skylarks



- Skylarks are ground nesting birds commonly in open farmland, pastures and grassy fields like those surrounding Long Stratton at Site 7 as well as across the rest of the scheme.

- Classified in the UK as Red under the Birds of Conservation Concern 5: the Red List for Birds (2025).https://www.bto.org/sites/default/files/publications/bocc-5-a5-4pp-single-pages.pdf
- Male skylarks rise vertically from farmland, grassland etc to sing and parachute back down to earth.

Species that require long, open sight lines - specifically Skylarks and Lapwings are often displaced by the physical presence of solar arrays. Skylarks rarely nest within the arrays because their view of predators is obstructed by the panels. Lapwings typically avoid nesting in fields with vertical structures like panels or high hedges.

Any mitigation measures put in place must be carefully managed and designed to specifications suitable for individual species to survive. (Chttps://www.cam.ac.uk/stories/solar-biodiversity-birds#:~:text=Birdlife%20soars%20on%20nature%2Dfriendly,individuals%20than%20surrounding%20arable%20land. Centre for landscape regeneration, University of Cambridge, RSPB 13/2/25).

These birds are highly vulnerable to disturbances and organisations like Bird Aware Solent and the RSPB emphasise that adult birds will often desert nests if disturbed by dogs or walkers, leaving eggs or chicks vulnerable to cold or predators. Therefore it can be extrapolated from this that heavy machinery and construction traffic would have a negative impact on these birds nests too. (Norfolk Wildlife Trust, RSPB, British Trust for Ornithology :The Norfolk Bird Atlas, Game & Wildlife Conservation Trust).

East Pye Solar consider only 81 breeding pairs have been found across the scheme yet skylarks are actively heard and seen across all fields.

A skylark mitigation areas has been included within some sites which proves how valuable this area is to the protection of this endangered and protected bird. Removing 2718 acres cannot be adequately mitigated by 4 sites of about 30 acres each.

8.3 Turtle Doves



The area around Tasburgh and Hempnall in South Norfolk is considered a prime, albeit rare, location for spotting the declining European turtle dove (*Streptopelia turtur*).

Given their scarcity, the best chance of spotting them is in the early morning in early summer, listening for their distinctive "purring" song.

Turtle Doves are known to breed at Wood Green a couple of hundred meters from Cable Route Corridor 4 as well as within 7A.

- **Location & Sightings:** Turtle Doves have been sited on Sub-site 7A;
- Records indicate turtle doves in the immediate area, specifically around the B1527 Hempnall Road and Norwich Road, just south of Tasburgh. They are known to return to this locality annually, with sightings often reported in the vicinity of farms and hedgerows.
- **Best Time to See:** Turtle doves are summer visitors to the UK, typically present from **late April to September**.
- **Habitat & Habits:** They prefer farmland with dense, tall hedgerows for nesting and, crucially, access to water and seed-rich foraging areas. In this region, they may be spotted feeding on the ground or perched on telephone wires.
- **Conservation Status:** The UK population has declined by 99% since the 1960s, making them extremely rare. Local conservation efforts, often supported by initiatives like

Operation Turtle Dove, are active in Norfolk to provide food and water to help them breed. RSPB

Given their scarcity, the best chance of spotting them is in the early morning in early summer, listening for their distinctive "purring" song.

8.4 Lapwing

- Site 7 is part of the Priority Species for Countryside Stewardship Targeting for Lapwings.
- Lapwings breed on wet, grassy fields and arable and have been recorded on neighbouring fields to Site 7.
- Like Skylarks, Lapwings typically avoid nesting fields with vertical structures like panels and high hedges and are highly vulnerable to disturbances.

Lapwings occur in fields adjacent to Plot 7F but will be forced off during the construction phase and are considered unlikely to return once the panels are operational.

8.5 Great Crested Newts

Site 7 is a CORE strategic area of opportunity for Great Crested Newts with recorded colonies and sites within the Core 5 and Fringe 5 data.

- **Natural England** will only accept survey results carried out within the optimum survey period between **mid April to the end of June;**
- **From Natural England,** 'a survey for Great Crested Newts should be conducted where there's a suitable water body such as a pond or ditch within **500 metres** (m) of the development, even if it only holds water for some of the year' Gov.uk;
- Great Crested Newts have been located on multiple ponds and water areas on sub-site across 7 and across the cable routes based on data records since 2006 up and until 2023 EPS Enviromental Study Vol3; App 8.3 March 2026;
- East Pye Solar stated Surveys were to be carried out June 2024 and June 2025 on other ponds and water areas on sites;
- Further surveys were carried out on a 250m buffer zone and are dated towards the end of June (at the end of the optimum survey time) also into July, August and September;

- GCN were found to be on ponds and water areas within Site 7 and within the 250m buffer zone of sub-sites of 7 ;
- No surveys were carried out on ponds on CRC as ponds were not present on the online mapping and only discovered during CRC extended habitat surveys undertaken in late 2025 and therefore status is unknown but precautionary assumption is made. There are GCN on most ponds across the CRC;
- Some results were 'precautionary positive' due to no access or ponds were dry. Surveys on fields during key harvest times and during summer months, especially in June 2025 when the county had been in drought for months, is no surprise;
- Many local ponds have not been surveyed for Great Crested Newts by which there are breeding colonies;
- **Many natural habitats will be removed or disturbed, like significant hedgerows and foraging habitat, during construction;**
- The GCN population is considered important at a local level;
- Absence of a record labelled as 'inconclusive' does not mean there are no Great Crested Newts. It could mean there is no survey data available for that location or data could not be gained;
- In addition to the water ponds and streams circled below there are all the water courses and tributaries of the river Tas within close proximity
- Great Crested newts are recorded on Norfolk Biodiversity emapper in the area at D'Oyly's Grove and at Wood Farm House. All these sites and properties will be engulfed by solar arrays with cable routes also impinging closely, please see https://www.hempnallpc.org/wp-content/uploads/2024/09/East-Pye-Solar-Land-Options-17-09-2024.pdf Sub-site 7C and B specifically.

8.6 Common Toads

In South Norfolk, common toads are protected under the Wildlife and Countryside Act 1981, which prohibits their trade, sale, or barter. As a NERC Act 2006 (Section 41) Biodiversity Action Plan species, they are considered a priority species, requiring developers and planners to mitigate against adverse effects.

Many villages have 'Toad Patrol' to help the toads cross roads to the safety of ponds for breeding.

Key protection details:

- **Legal Status**
- **Planning Protection:** Due to being a Biodiversity Action Plan (BAP) species, local planning authorities must consider impacts on toad habitats (ponds/terrestrial) during development.
- **Conservation Status:** Recognized as a species of principal importance.
- **Highways Consideration:** Planners and engineers must consider toad migration routes in road developments.

8.7 Badgers

Badger surveys are confidential to the public. Has the Applicant surveyed Site 7?

Active badger setts have been identified across Site 7.

- Land parcels 7F and 7D support Badger setts.
- Active den, suspected badger sett, lies within 2 metres of site 7B.



There are other setts nearby on Sub-site 4B a few hundred metres away demonstrating that badgers are resident within the area.

The proposed Sub-sites will be covered by solar panels and surrounded by fencing.

The submitted badger information is redacted, so affected parties cannot determine whether these active setts have been identified, classified or assessed. This creates a serious uncertainty in the ecological baseline and in the assessment of construction disturbance, severance of foraging/commuting routes, collision risk, lighting, vibration, trench hazards and potential sett interference.

The Applicant should be required to confirm confidentially to the Examining Authority, Natural England and the relevant authority ecologists whether these setts are included in the ES badger survey; whether they are a main, annex, subsidiary or outlier sett; what activity level has been recorded; what buffer distances are proposed from haul routes, fencing, panels, trenches, lighting and construction compounds; whether any works would require a Natural England licence; and where those measures are secured in the DCO requirements and certified documents.

Given that these sett lies in an area also associated with Barbastelle Core Sustenance Zone habitat, within a hydrologically connected landscape draining toward the River Tas, as well as Skylarks, Turtle Doves and Lapwings demonstrating the significance to ground nesting at Site 7, this cannot be treated as a minor isolated constraint. It is further evidence that across Site 7 forms part of a connected ecological network whose disturbance, fragmentation and cumulative effects have not been adequately fixed or assessed.



In practical terms, it is specific, evidential, site-based, and exposes the weakness of outline mitigation. This indicator sits under Ecology baseline adequacy / protected species / construction controls / Site 7 specific constraints, and cross-reference barbastelles, woodland isolation, haul routes, lighting, hydrology and the Tas.

8.8 River Tas – Protected Chalk Stream

Chalk Streams are ecologically sensitive water bodies typically found in areas of chalk bedrock like that proposed by East Pye Solar.

85% of Chalk Streams are found in the UK and 10% of those are in Norfolk making the county globally important for this rare habitat.

Chalk Streams are one of the rarest habitats on earth with their crystal-clear water home to water voles, white-clawed crayfish, Norfolk hawker dragonflies and kingfishers; making them our equivalent to the Great Barrier Reef or Amazon Rainforest. A truly special habitat.

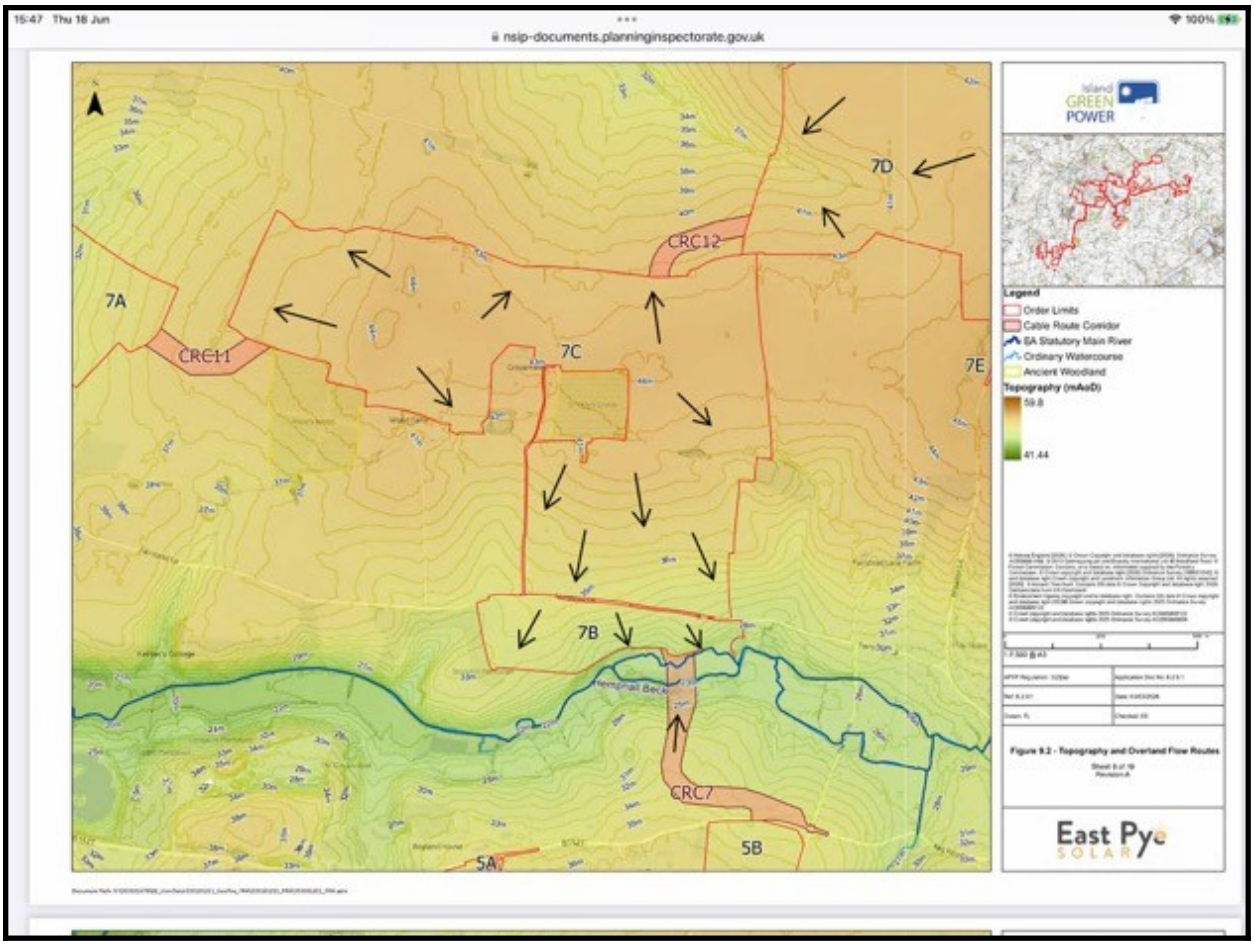
They are not just important in their own right, they are a fabulous corridor for wildlife such as otters, birds, bats - helping them move through the landscape.



Some risks posed to chalk streams in the construction, operation and decommissioning of a solar factory as follows:

- **Water consumption**: will increase reducing potential availability for chalk streams especially during dry periods.
- **Habitat Modification**: changes in land use will disrupt the natural habitats of flora and fauna that rely on chalk streams.
- **Runoff and Pollution**: construction activities like wheel washing can increase runoff and introduce pollutants like oils and chemicals that can adversely affect water quality in chalk streams.
- **Soil Compaction**: Heavy machinery used during construction, decommissioning and maintenance during operation will compact the soil affecting groundwater recharge and potentially altering the flow and quality of water feeding the chalk stream.
- **Erosion**:The removal of vegetation during construction can lead to increased erosion, which can introduce sediment into the stream and harm aquatic ecosystems.

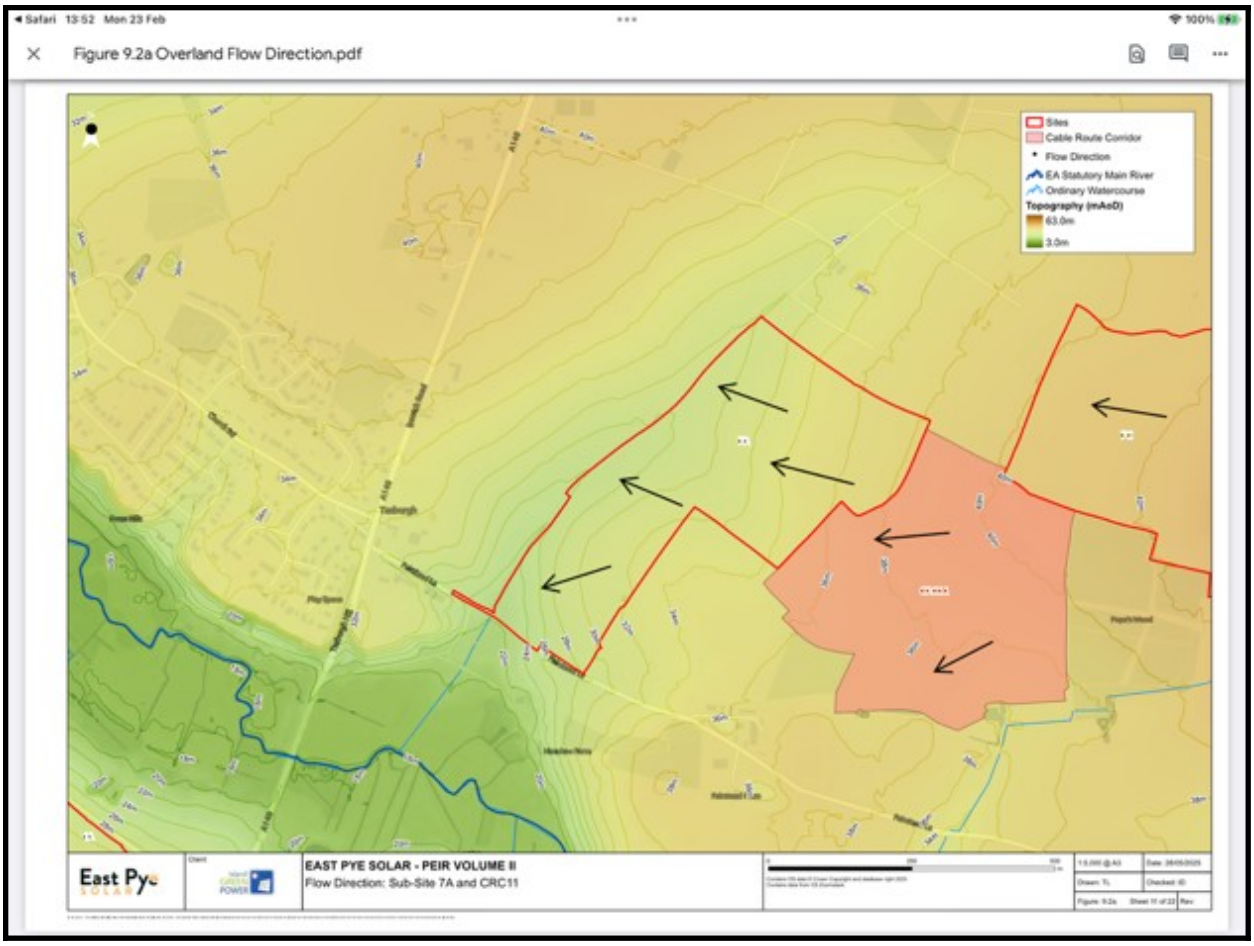
The River Tas runs directly south of Sub-sites 7A, 7B and 7C and is only **15m from the southern boundary of Sub-site 7B**

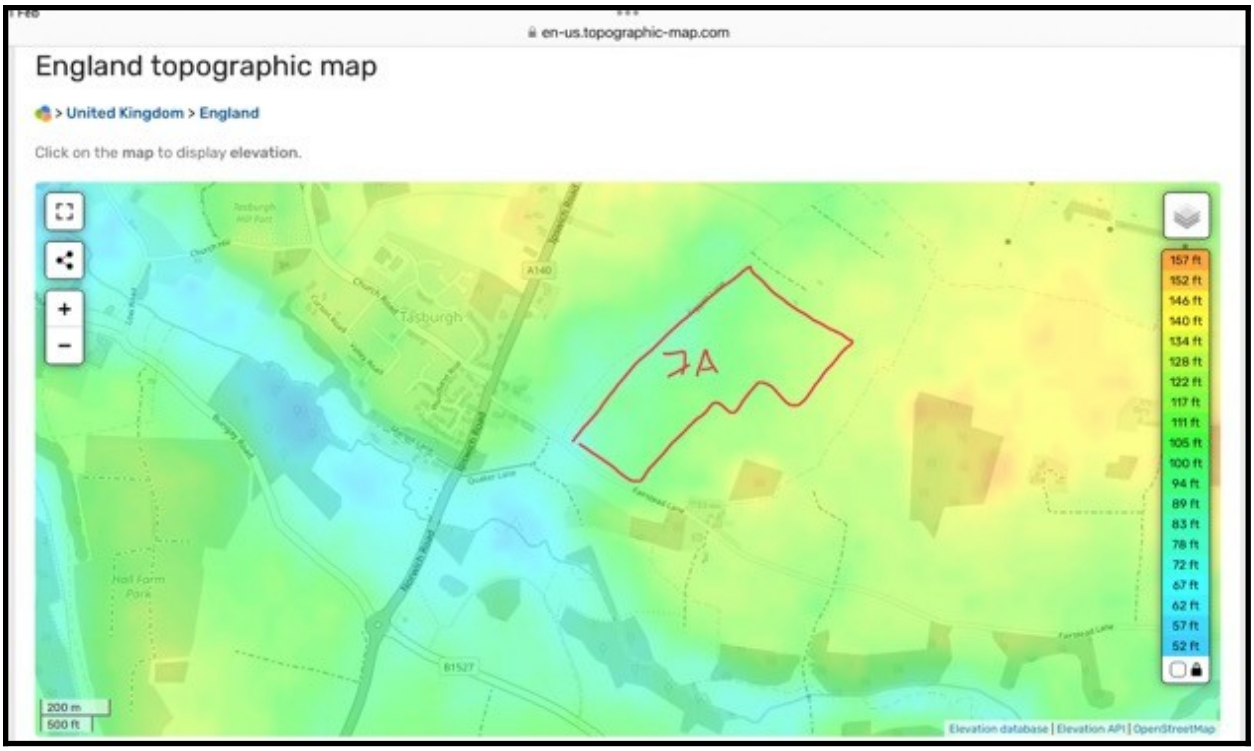


Sub-Site 7A has an unnamed water course flowing along the west boundary of the site.

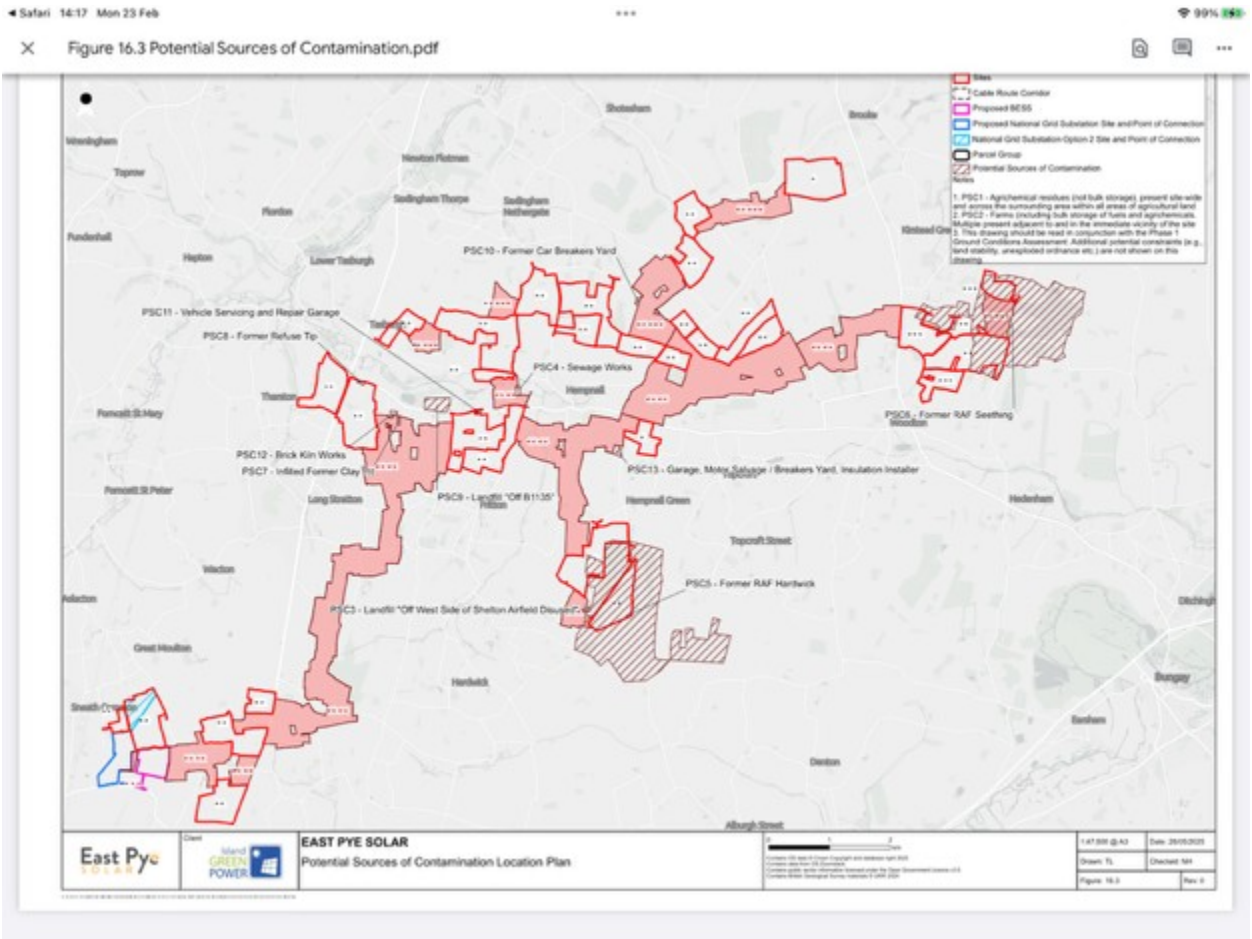


As Sub-site 7A is sloped down towards this watercourse the Tas could be subjected to run off and changed hydrology during construction, operation and decommissioning. In particular Sub-site 7A has changing ground conditions (See Chapter Ground Conditions) which makes construction on this site not a ‘one size fits all’ situation making the hydrology more vulnerable.





The removal of vegetation, soil compaction, use of extensive concrete, a haulage route, cable route corridor, the building of a substation all across site 7 and changed hydrology patterns from the installed infrastructure, will have a significant impact on water flows across this huge Site and to the Tas. These fields already flood during the winter months.



The river and drainage network nearby in the River Tas catchment and South Norfolk agricultural landscape is part of a broader freshwater ecosystem that supports several species of conservation concern, including:

- White-clawed crayfish (endangered freshwater crayfish)
- European eel (critically endangered migrant fish)
- Water vole (nationally vulnerable)
- Otter and kingfisher (important indicator species)

These species are part of the biological value of river corridors in Norfolk, and their presence depends upon good water quality, habitat complexity and effective conservation management.

8.9 White Clawed Crayfish

The White-Clawed Crayfish is a freshwater bronze-coloured crustacean with pale undersides to its claws.

They live in clean, calcareous, oxygen-rich and slow-flowing freshwater streams, rivers, lakes, canals and quarries which are mineral-rich for their shell development.

They require an environment where they can hide and burrow like tree roots, woody debris, rocks and stones. Commonly shallow waters (under 1m) though they can inhabit deeper water.

Norfolk Rivers Trust has confirmed the presence of breeding colonies of White Clawed Crayfish in the river Tas and its tributaries.

The direct hydrological connection between Sub-site 7A, 7B and 7C to the River Tas and its catchment area poses a significant risk to the hydrology of the Tas and White Clawed Crayfish.

The southern boundary of Sub-site 7B lies 15m uphill of Hempnall Beck and hence any runoff from the land parcel would flow directly into the Beck. This could cause significant harm to white crayfish populations, as with any other vulnerable organisms living in or around the water, from sediment in suspension and chemical leachate during panel installation and maintenance and cleaning procedures.

White Clawed Crayfish are protected in the UK under the Wildlife and Countryside Act 1981, Annex II and V of the EC Water Habitats Directive and listed as Endangered on the global IUCN Red List of Threatened Species.

It is illegal to take or disturb White-Clawed Crayfish with a licence.

Distribution, although widespread, is **Rare.**



8.10 Hedgerows and Significant Trees

According East Pye Solar, across the Site ‘the Scheme’ will be designed to avoid removal and damage to hedgerows. Subject to final design, where this is not feasibly practicable, some removal of hedgerows may be required. Any removal would be in line with the Hedgerow Regulations (1997)32 with necessary assessment taken place.

However there is already evidence that hedgerows on parts of the scheme have been damaged or removed at strategic points as well as trees highlighted at points of road widening including on transport routes. In addition, plenty of mature hedgerows will be removed to create cabling corridors, access points and internal haulage routes across the sub-sites of 7.

An example of enclosed fields and mature hedgerows on Site 7



Sub-site 7A from the south-west border growing barley


PYMAR'S LAN

Fairstead Lane west with the junction of Pymers Lane

Single track, mature trees and significant hedgerows border both sides of Fairstead Lane



Fairstead Lane



Fairstead Lane

There are 11 areas of Ancient Woodland located within 2km of site 7:

- Doyly's Grove, adjacent to eh south, west and north of sub-site 7C;
- Popes Wood, adjacent to the south of sub-site 7C;
- Saxlingham Grove, adjacent to the north of sub-site 7F and 7G;
- Little Wood, adjacent to the south of sub-site 7H;
- Winters grove, located 550m south-east of sub-site 7K;
- Beckett Woods located 575m south-east of sub-site 7L
- Privet Wood, located 745m south-east of sub-site 7L;
- Ringers Wood, located 770m north of sub-site 7I;
- Great Wood, located 1.2km north of sub-site 7F;
- Green Farm Grove, located 2km north of sub-site 7G;
- Brooke Wood, located 2.3km north of sub-site 7K

Smockhill Local Nature Reserve (LNR) is located 2km north of sub-site 7C.

Broadland Ramsay site, SPecial Protection Area (SPA), SACis located 9.2km north-east of sub-site 7K.

North Valley Fens SAC is located 2.8km north-west of sub-site 7A.

There are multiple SSSIs within 5km of Site 7:

- Shotesham-Woodton Hornbeam Woods SSSI, borders sub-sites 7F, 7G and 7H;
- Fritton Common SSSI, located 2.1km north of sub-site 7D;
- Shotesham Common SSSI, 4.5km south-east of sub-site 7L;
- Hedenham Wood SSSI, 4.6km east of sub-site 7L;
- FLordon Common SSSI, 4.7km west of sub-site 7A.

Veteran and ancient trees are living legends that have been a part of our landscape for generations. They are vital havens and habitat for wildlife and important carbon stores. Trees play a crucial role in regulating the climate and increase resilience to climate change. In the immediate term the habitats and benefits that mature trees provide cannot be replaced with newly planted saplings.

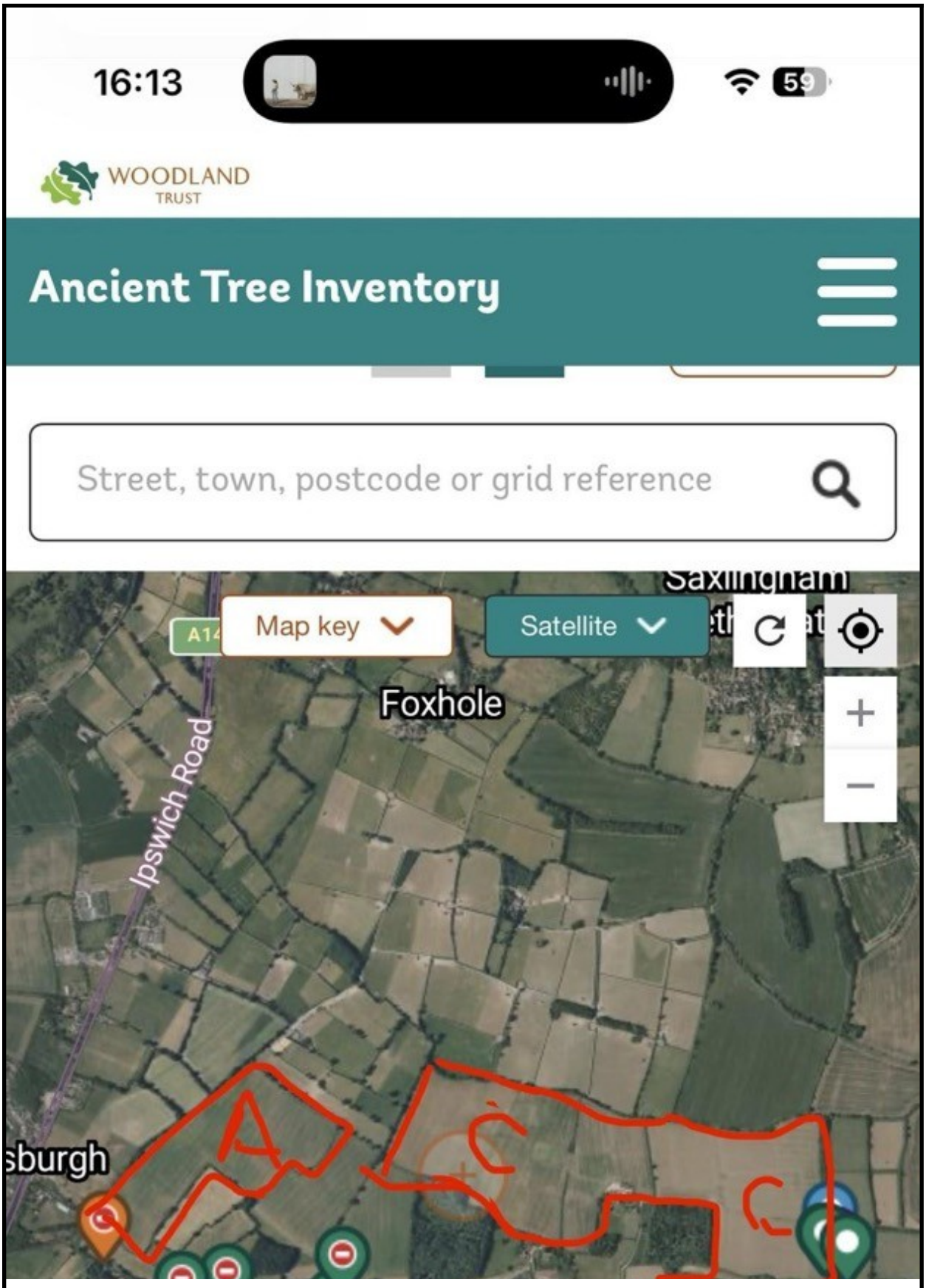
East Pye solar project Site 7 has several veteran and ancient oak trees within close proximity to the sites or at the roadside. This makes them vulnerable to the effects of construction of the solar arrays, substation and access routes onto the sites.

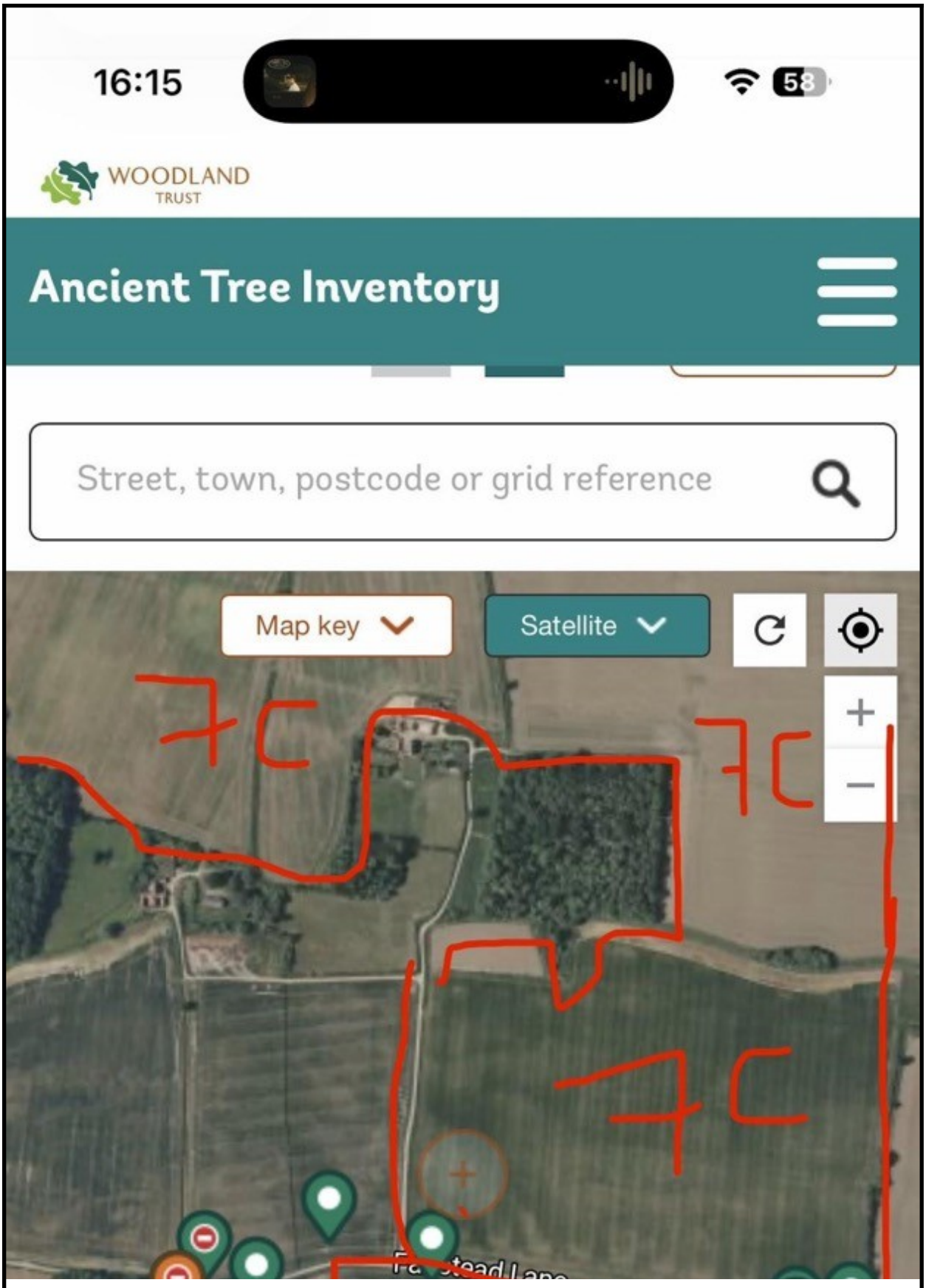
Oak tree contribution to landscapes, biodiversity, culture and economy is immeasurable.They symbolise royalty, patriotism and strength! They provide a habitat for 2300 wildlife species providing vital spaces to eat, shelter and breed. The true numbers of biodiversity are likely to be larger as the figure of 2300 doesn't include bacteria and other microorganisms.

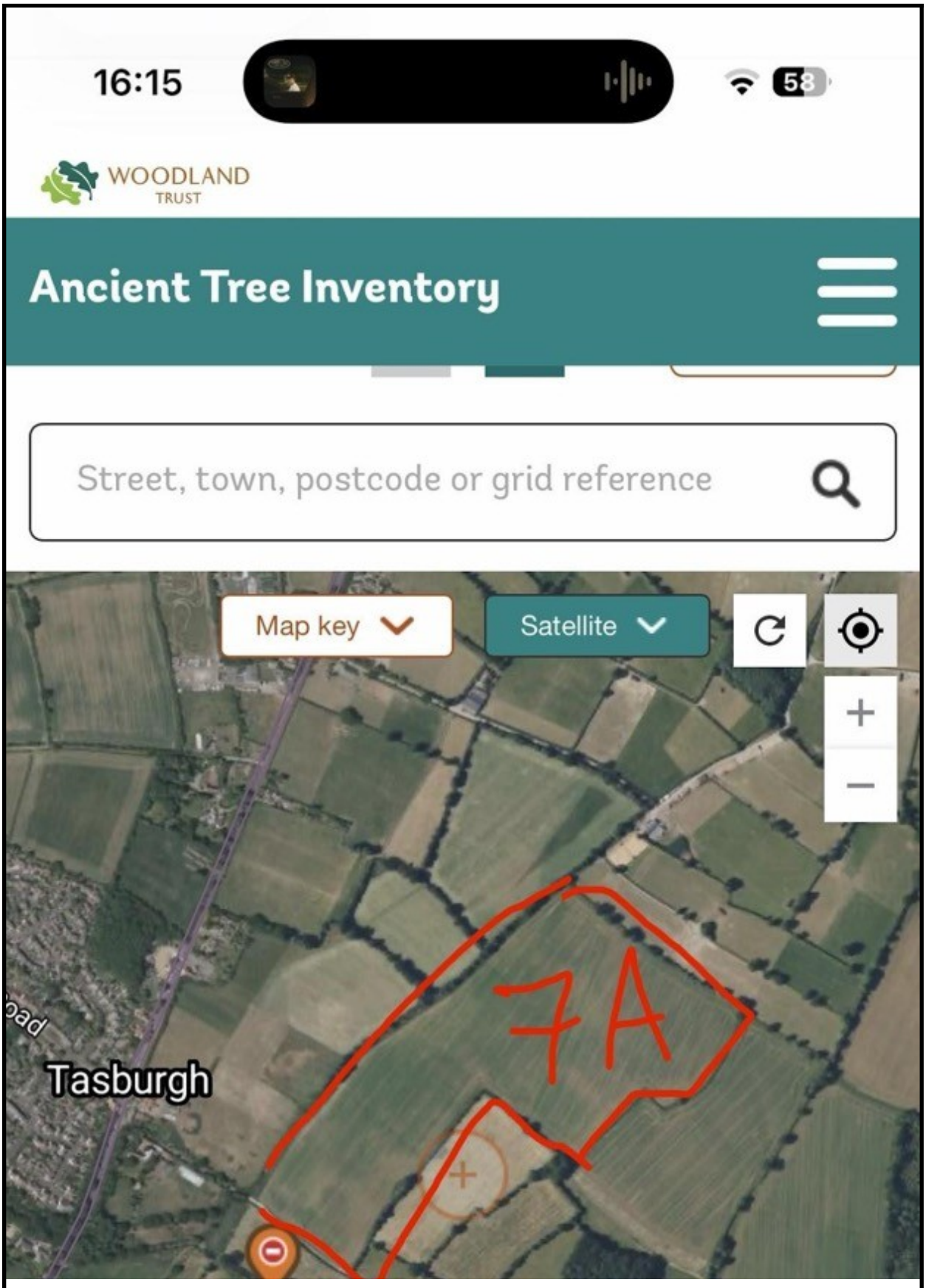
NO OTHER TREE SPECIES IN THE UNITED KINGDOM SUPPORTS A GREATER DIVERSITY OF LIFE THAN AN ANCIENT OAK

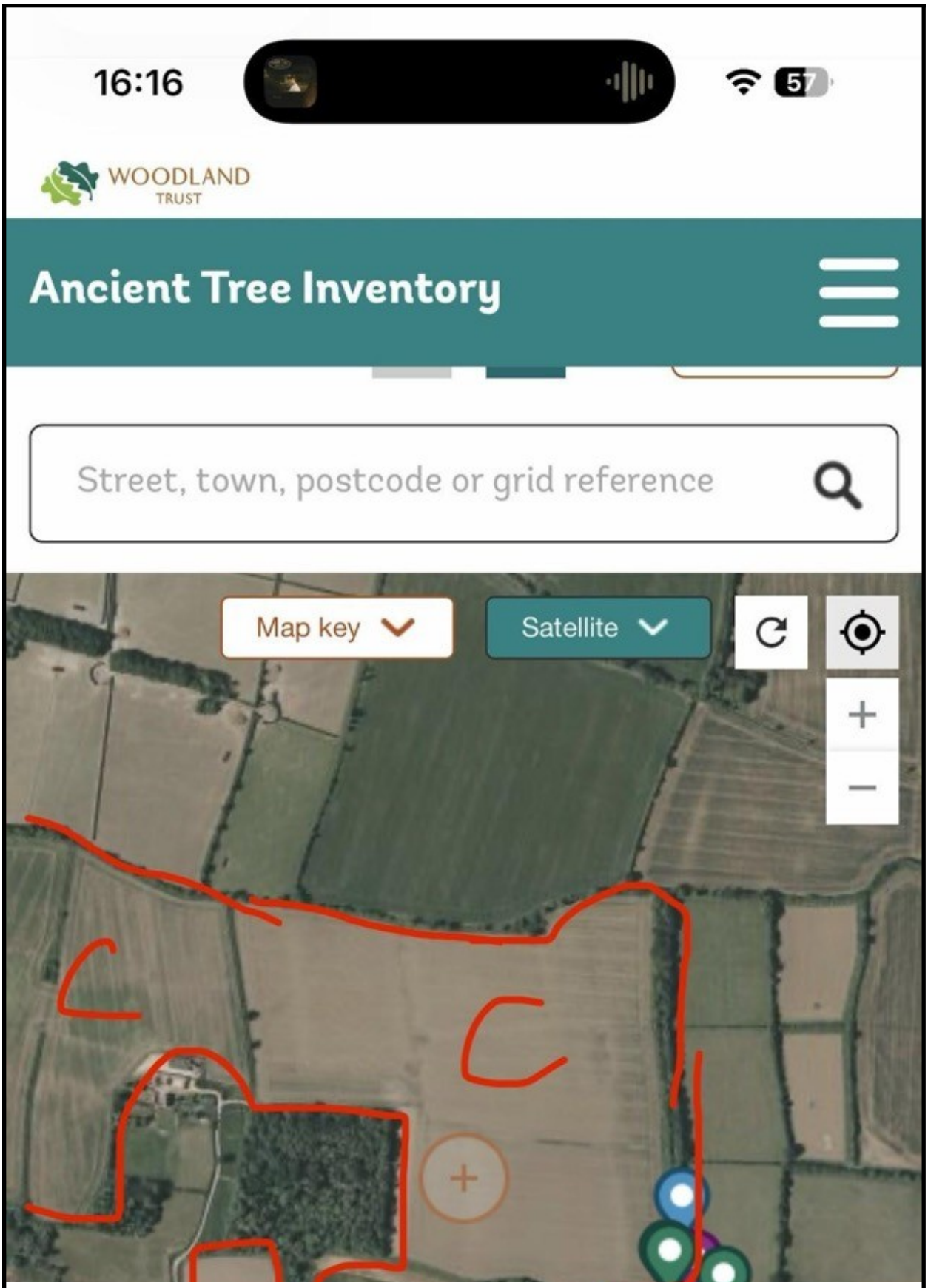
Saxlingham Nethergate - The green is lined with overhanging ancient oak (at least 12), dated over 500 years. Other trees such as horse chestnuts and lime dated over 200 years

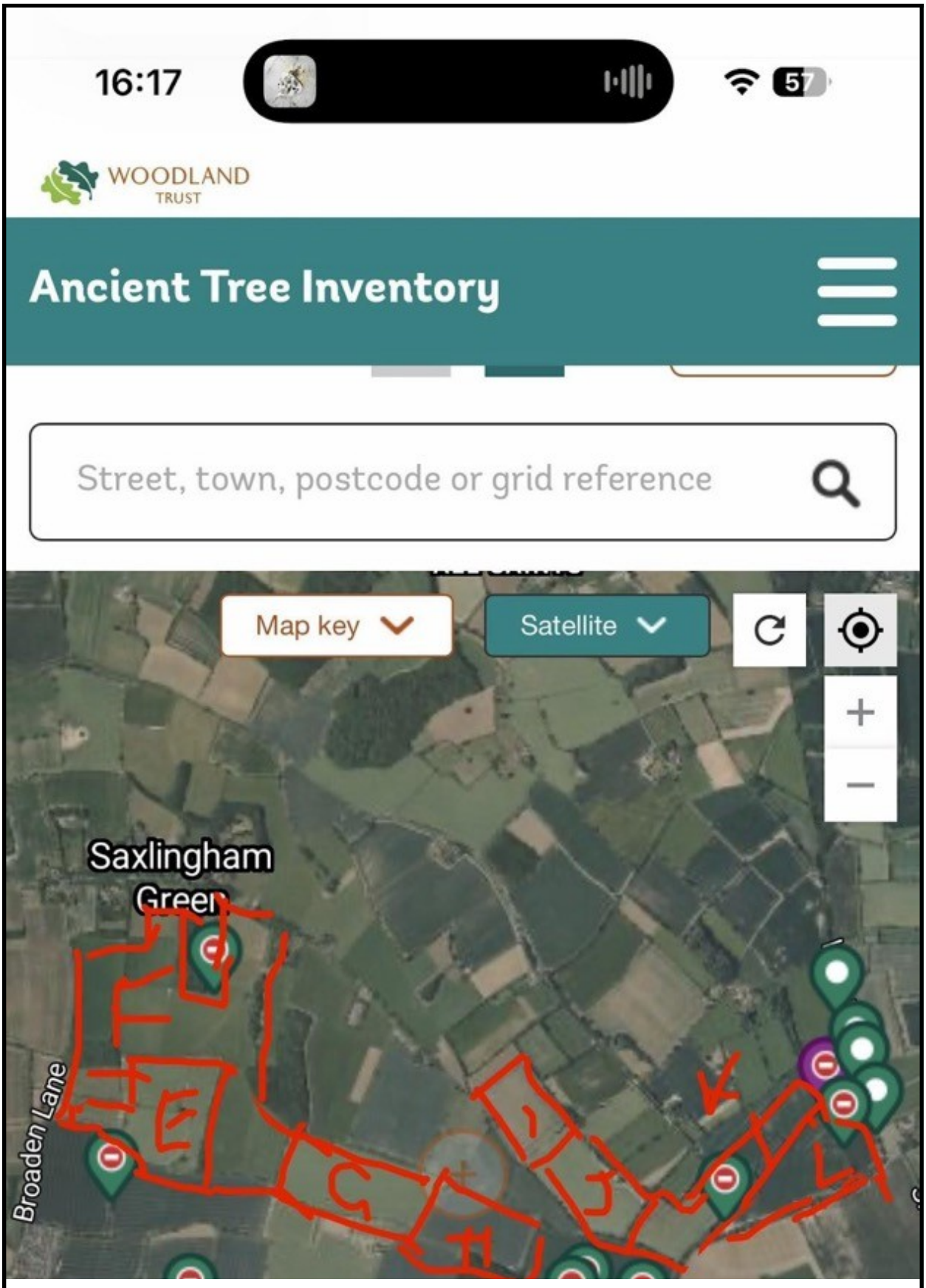
There are multiple Ancient and Veteran trees across Site 7, cable route, and access points


16:13
WOODLAND TRUST
Ancient Tree Inventory
Street, town, postcode or grid reference
Map key
Satellite
A14
Foxhole
Ipswich Road
A
C
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16:15
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Ancient Tree Inventory
Street, town, postcode or grid reference
Map key
Satellite
Saxlingham Green
Broaden Lane

‹ Image 2 of 2 ›



WOODLAND TRUST

Ancient Tree Inventory



About the tree

Show more

Species:	**Oak**
Form:	**Pollard**

Ancient and established hedgerows benefit nature and climate

Ancient and established hedgerows are critical, living infrastructure that provide immense, multi-layered benefits to both biodiversity and climate change mitigation, often acting as "superheroes" of the countryside. These, often centuries-old, linear habitats function as vital **wildlife corridors**, **carbon sinks**, and **natural flood management systems**. CPRE

Here is a detailed breakdown of how they benefit nature and climate:

Benefits to Nature and Biodiversity

- **Biodiversity Hotspots & Refuges:** Hedgerows support over 600 plant, 1,500 insect, 65 bird, and 20 mammal species. They are essential habitats for threatened species, including the **hazel dormouse**, hedgehogs, and the brown hairstreak butterfly.
- **Green Corridors (Wildlife Highways):** In fragmented landscapes, established hedges act as crucial, continuous green arteries, allowing species to move, forage, and spread safely between isolated woodlands and fields.
- **Food and Shelter:** They provide year-round resources, including berries, nuts, and nectar for pollinators, and act as nesting sites for farmland birds (supporting up to 80% of woodland/farmland bird species).
- **Nursery for Predators:** Hedgerows house predatory insects (like ladybirds and beetles) that naturally control agricultural pests, reducing the need for pesticides. CPRE

Benefits to Climate and Environment

- **Carbon Sequestration & Storage:** Like trees, hedgerows lock up significant carbon in their woody biomass, leaves, and roots. Crucially, the soil beneath established, older hedges can store up to **40% more carbon than surrounding grassland**, making them a major long-term carbon sink.
- **Soil Stabilization:** Their deep, established root systems bind the soil, reducing erosion from wind and water, which is essential given that 1 inch of topsoil can take over 500 years to form.
- **Flood Mitigation & Water Quality:** Hedgerows act as "sponges" and physical barriers that intercept heavy rainfall, slowing water flow and increasing infiltration, thus reducing flood risks. They also reduce water-borne pollution by trapping fertilizers and pesticides before they enter watercourses.
- **Microclimate Regulation:** They provide vital shade and shelter for livestock and crops, reducing heat stress in summer and protecting against cold winds and snow in winter.
- **Air Pollution Capture:** In both rural and urban areas, hedgerows, particularly those with rough, hairy leaves, trap air pollution particles. University of Leeds

The Value of "Ancient" vs. New

- **Species Richness:** Ancient hedges (often 400+ years old) have higher species diversity, providing more varied habitats and resources than recently planted, single-species hedges.
- **Structural Maturity:** Older, established hedges have larger, more robust roots and biomass, offering superior carbon storage and shelter compared to young trees.
- **Heritage & Continuity:** They act as historical landmarks that define landscape character and connect us to centuries of agricultural heritage. University of Leeds
- A checkerboard of segregated fields is typical of the character of South Norfolk and easily identified across the scheme by the various shapes of land parcels proposed;
- Site 7 comprises of fields separated by hedgerows;
- CRC4 comprises of approximately 50 fields separated by hedgerows.

8.11 Rare Flora

No surveys have been carried out on road boundaries and verges across the Scheme. Many verges are supported by the Road Side Conservation Scheme and will be impacted with heavy construction traffic and access points for Cabling and Sites.

Chapter 9: Water Environment

Introduction

9.1 Rivers, Streams, Ditches, Culverts

Saxlingham Nethergate - Numerous culverts and ditches run alongside the narrow road through the village to The Green. Culverts also run under the unclassified road forming The Green, connecting roadside ponds to flowing ditches on the opposite side. These culverts will undoubtedly be damaged by the planned HGV traffic. The photo below, of the road between Saxlingham Nethergate and Hempnall, at the bend at the start of The Green, looks just like a regular road but underneath is a bridge and a culvert. This bridge is opposite an ancient wall. If indivisible loads pass through they would damage the culvert and the wall.



Junction of Broaden Lane and The Green, looking towards Saxlingham Nethergate Grid ref: TM2380 9660

A flowing ditch runs alongside The Street in Saxlingham Nethergate, edged on the road side of the ditch by concrete banking and white metal railings (see photo below).



The Street, Saxlingham Nethergate, looking South TM2292 9740

This is the proposed route for the AIL and other HGC traffic but the weight of such loads would undoubtedly cause damage to the concrete banking, if not total collapse. The vehicles could not keep away from this vulnerable edge because of buildings, pedestrian paving and residential garden boundaries e.g. brick walls on the opposite side of the road. Large volumes of surface water run-off collect near the war memorial during heavy rain, e.g. running down from Wash Lane (where an improvement scheme is about to start), Church Hill and Pitt's Hill, and a large culvert under a footbridge feeds into this ditch (see photo below) so any damage to the ditch could cause

flooding to surrounding properties.



Flooding on route through Saxlingham Nethergate Grid ref: TM2298 9712

Appendix A, utilising EA Open Data datasets available online and reproduced with OS mapping under licence. The Flood Zone and Risk of Flooding from Surface Water (RoFSW) maps utilise the extents from the EA National Flood Risk Assessment ('NaFRA2') mapping updates released early 2025.

Historic Flooding Records

The EA Historic Flood map indicates that there is no record of land within the Order Limits being impacted by incidences of fluvial flooding.

The NCC Flood Investigation Reports indicate that flooding has occurred on local roads and properties of villages in the vicinity of the Order Limits, including Hempnall, Woodton and Long Stratton. The mechanisms of flooding were considered to be unmaintained drainage systems, with locations of properties adjacent to, or within, an overland flow path and the design standard of the drainage systems being unable to cope with significant rainfall events.

This makes no reference to the internal flooding of properties in The Street in Saxlingham Nethergate in 2020, which although some areas may fall outside of the boundary- The Street forms part of the abnormal load route. During that event, floodwater accumulated on the highway

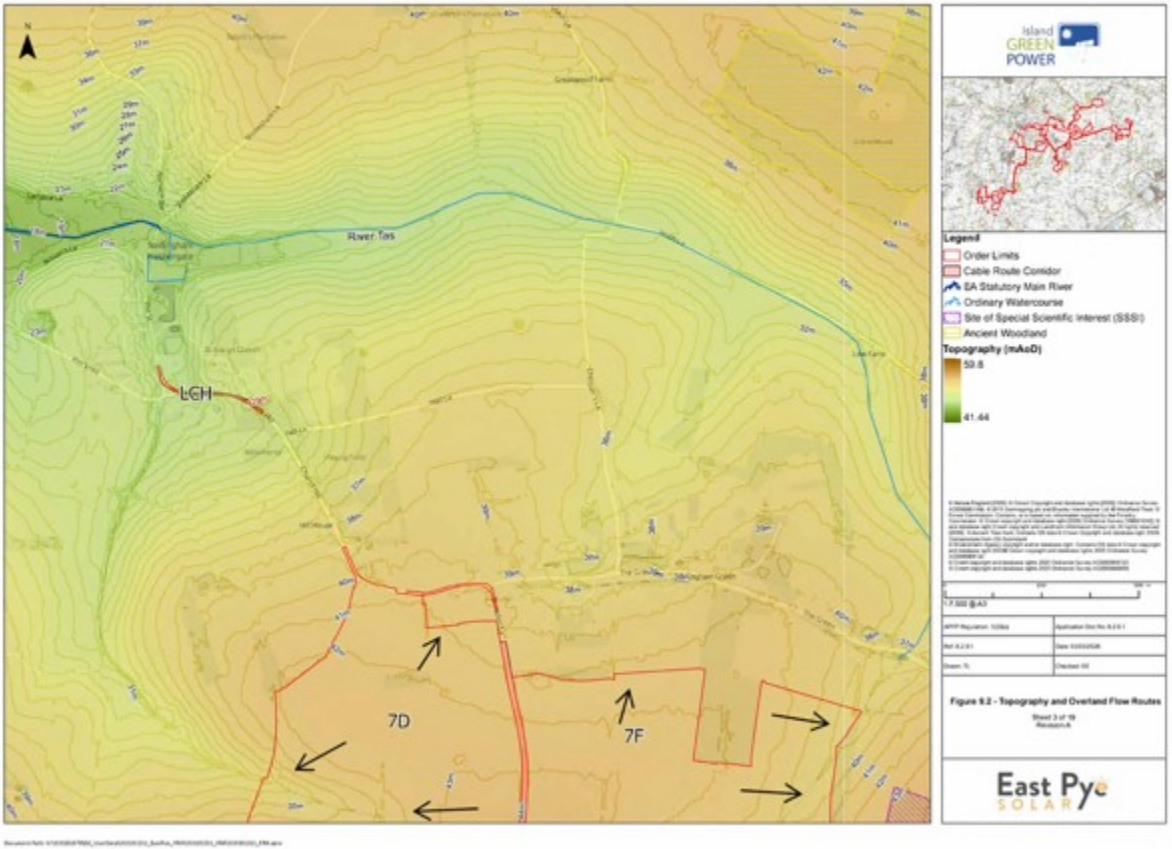
and was materially exacerbated by passing traffic displacing water toward residential properties. The actual flooding experienced demonstrates that mapped datasets and modelling alone may not provide a complete representation of local flood susceptibility or surface water behaviour during severe rainfall events when there is heavy traffic along the roads. The flood risk assessment is therefore incomplete.

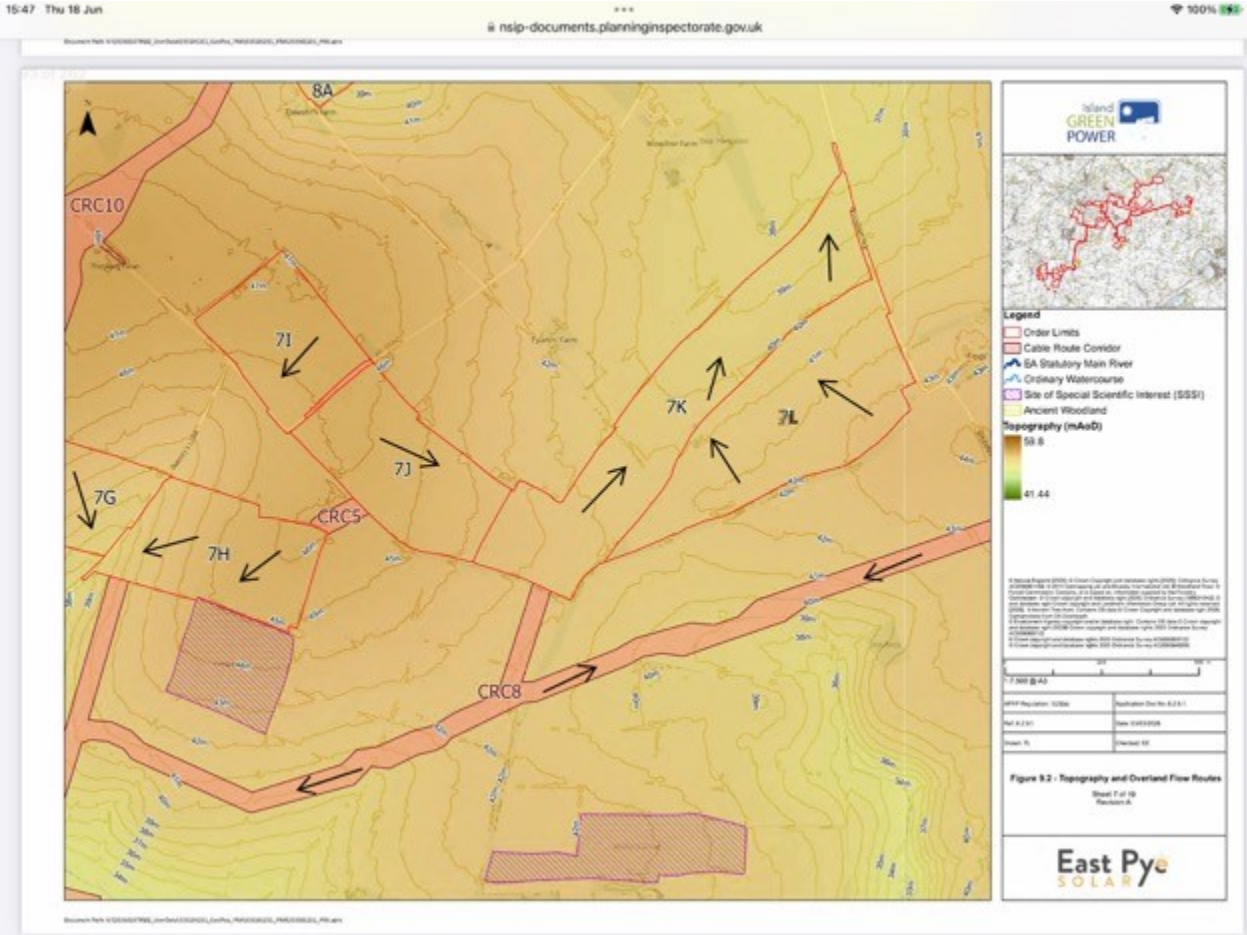
Given the inconsistencies mentioned above it is submitted that too much information is deferred or unclear and given the scale and cumulative effect of the scheme, residents and other people impacted should be clear and fully consulted.



Culvert on The Street, near War Memorial, Saxlingham Nethergate TM2298 9712

15:46 Thu 18 Jun
nsip-documents.planninginspectorate.gov.uk
100%





9.2 Flooding

Saxlingham Nethergate - the land parcels are on heavy clay soil, as are the surrounding fields and public footpaths and bridleways. Many of these paths become badly flooded after heavy rain. The garden of one of the houses overlooking 7F, Woods End Cottage, that abuts a field next to 7F, is water-logged all winter and sometimes at other times after heavy rain, as is the field next to 7F. The concrete plinths, pads and pilings for the panels, inverters and substation will undoubtedly exacerbate this flooding for surrounding fields, roads and properties.

Historic Flooding Records

The EA Historic Flood map indicates that there is no record of land within the Order Limits being impacted by incidences of fluvial flooding.

The NCC Flood Investigation Reports indicate that flooding has occurred on local roads and properties of villages in the vicinity of the Order Limits, including Hempnall, Woodton and Long Stratton. The mechanisms of flooding were considered to be unmaintained drainage systems, with locations of properties adjacent to, or within, an overland flow path and the design standard of the drainage systems being unable to cope with significant rainfall events.

This makes no reference to the internal flooding of properties in The Street in Saxlingham Nethergate in 2020, which although some areas may fall outside of the boundary- The Street forms part of the abnormal load route. During that event, floodwater accumulated on the highway and was materially exacerbated by passing traffic displacing water toward residential properties. The actual flooding experienced demonstrates that mapped datasets and modelling alone may not provide a complete representation of local flood susceptibility or surface water behaviour during severe rainfall events when there is heavy traffic along the roads. The flood risk assessment is therefore incomplete.

Given the inconsistencies mentioned above it is submitted that too much information is deferred or unclear and given the scale and cumulative effect of the scheme, residents and other people impacted should be clear and fully consulted.

Sub-site 7A Tasburgh, is in a Woodland flood risk zone as well as high spatial priority area to the south west boundary at Fairstead Lane as the land drains into the water course that flows towards the river Tas valley.

Sub-site 7B lies on high ground which also drains south into Hempnall Beck, a tributary of the River Tas. In places the river valley is quite deeply incised.

Sub-site 7C lies on even higher ground above 7B. Two vast fields of solar panels 4.5m high and tracking the sun east to west. Increased rainwater run-off and particularly at times of heavy rainfall and where soil is impacted would cause localised flooding downstream and have a significant impact on wildlife living/nesting on or close to the riverbank.

It could also increase sediment runoff thus choking the beck at times of heavy rainfall adversely affecting all forms of aquatic populations, such a white clawed crayfish.

The removal of field margins and hedgerows would accentuate this effect.

9.3 Public Drinking Water Supplies

The River Tas in Norfolk is part of the Broadland rivers catchment, which generally supports public water supplies, particularly around Norwich

While the catchment as a whole is used, the river is primarily characterized as a chalk stream and tributary of the River Yare.
Broadland Catchment Partnership

Key details regarding the River Tas:

- **Catchment Area:** The Tas originates at Carleton Fen , near New Buckenham and joins the River Yare at Trowse, contributing to the broader water network in the region.
- **Water Source:** The river, along with other Broadland rivers and groundwater, is utilized in the overall catchment strategy for supplying drinking water, specifically to the Norwich area.
- **Environmental Context:** As a tributary of the Yare, it is a chalk stream. However, water quality in the region has been flagged, with reports in 2025 suggesting high levels of pollution in many Norfolk Broads rivers. Broadland Catchment Partnership

Most public drinking water in Norfolk is sourced from groundwater (**chalk aquifers**) rather than directly from smaller, raw river sources like the Tas, though the river feeds the wider system.

The neighbouring properties to Site 7A Tasburgh are mainly on mains water however there are some private water supplies in the close vicinity on the plot.

Plot 7A fall under several schemes as follows:

- Woodland water quality, lower spatial priority
- Keeping Rivers Cool zone
- Ground Water Vulnerability area - soluble rock risk as medium.
- Countryside Stewardship water quality area - high priority
- Higher level stewardship target - Norfolk river valleys

9.4 Private Drinking Water Supplies

South Norfolk and Broadland District Council

South Norfolk and Broadland DistrictCouncil private water abstractions information

There are 35 private water supplies registered pursuant to the provisions of the Private Water Supply Regulations 2016 within 250m of the Site. The council were unable to provide co-ordinates. The strata from which these private water supplies abstract water were not provided. Private water supplies are located in proximity to the following CRC and sub-Sites.

o Substation.

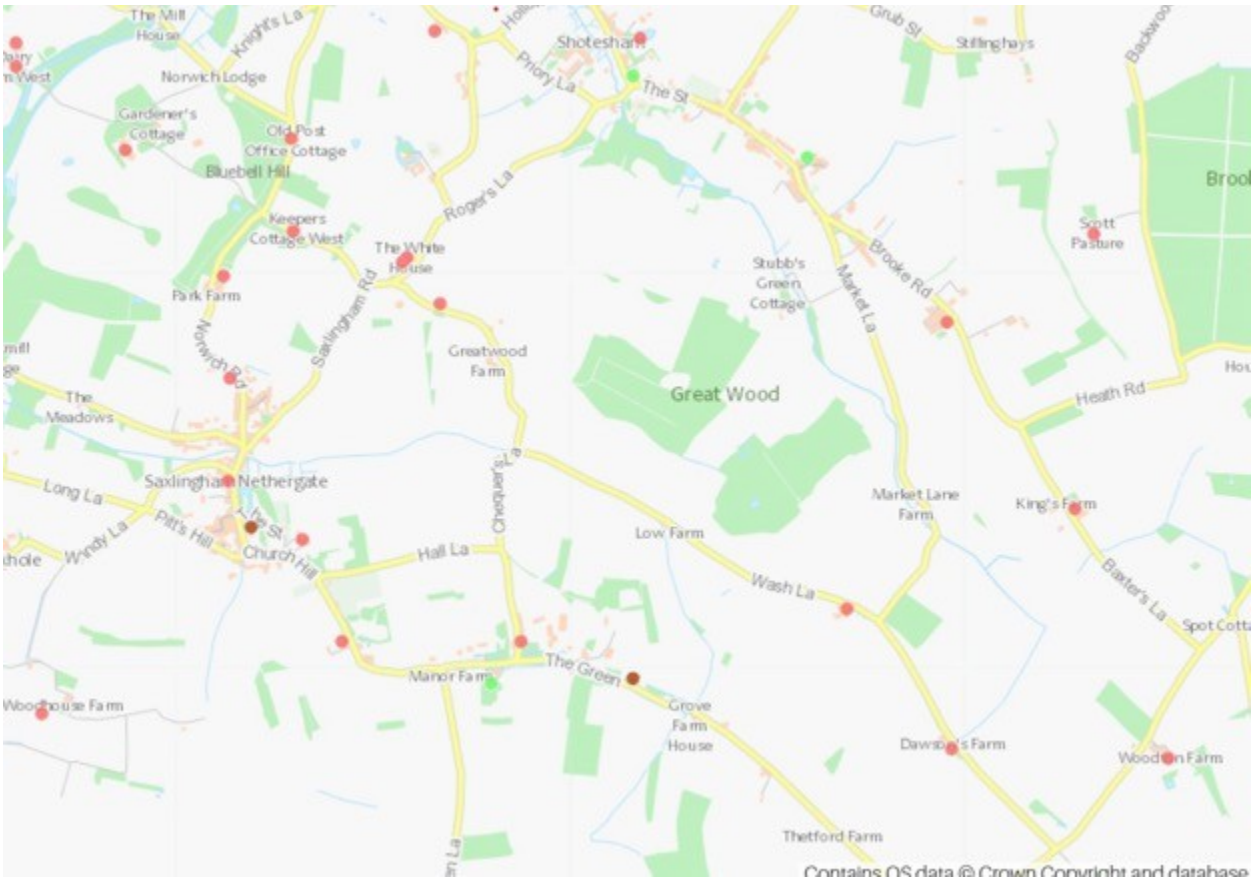
o 1A, 2B, 3A, 3B, 6, **7A, 7B, 7C, 7D, 7F, 7I**, 8A, 8B, 10E.

o CRC1, CRC2, **CRC4**, **CRC7**, CRC8, **CRC10**, **CRC11**, CRC13.

The Council do not hold any other relevant ground conditions information

Saxlingham Nethergate

According to The British Geological Society, the onshore private water supplies map shows bore holes along the route through Saxlingham Nethergate and The Green. The red dots on the map below illustrate the locations.



9.5 Drinking Water Protection Zone (SPZs)

The area between Tasburgh and Hempnall is within a designated water protection area. Specifically, this area is part of the

Yare Operational Catchment, which includes the **Hempnall Beck** and the **River Tas** (from its headwaters to downstream of Tasburgh). Data.gov.uk

Water protection in this area:

- **Drinking Water Safeguard Zones (SgZs):**The area is monitored for water quality, with specific attention to protecting water sources used for drinking.

9.6 Contamination risks to Public and Private Drinking Water Supplies

The **East Pye Construction site on site 7A, Tasburgh** and the influx of construction workers across the whole scheme will impact water and waste management during the 2-3 years the East Pye Solar project will take to build and subsequently dismantle. Flooding and groundwater resulting from wheel washing, pile driving and land disruptions will all have the potential to drain towards the chalk stream and lead to contamination of the water course. Land parcel 7A Tasburgh slope towards the tributary of the Tas as can be seen on OS Explorer 237 Norwich map.

- **Planning Constraint:** Any new development in the River Tas catchment that provides overnight accommodation (homes, hotels, etc.) must prove it will be **"nutrient neutral"** before planning permission is granted by South Norfolk Council.
- **Mitigation:** Developers must often use the Norfolk Nutrient Budget Calculator to determine how much nitrogen and phosphorus their project will add and find ways to offset it
- **Site 7A Tasburgh** is in a Phosphate issues high priority area

9.7 Risks of Pile-Driven and Concrete-Mounted Infrastructure to Private Drinking Water Supplies

East Pye Solar Project proposed plan for Site 7 is for the construction of solar arrays. Therefore these land parcels will be impacted as detailed below;

Concrete-mounted infrastructure—such as building foundations, pilings, paving, and retaining walls—can significantly impact private drinking water supplies (wells, boreholes, and springs) primarily through chemical leaching and physical disruption of groundwater flow. These impacts are most severe during construction and for a period after, as fresh concrete is highly alkaline and releases pollutants;

.

Chemical Contamination (Leaching)

- **High pH and Alkalinity:** Fresh concrete and grout are extremely alkaline (high pH). Rainwater or groundwater passing through or over new concrete structures can dissolve cement components, leading to "leachate" that increases the alkalinity of nearby groundwater.
- **Heavy Metal Contamination:** Concrete leachate can contain heavy metals and harmful elements that contaminate water sources, including chromium (particularly Hexavalent Chromium VI), arsenic, barium, lead, zinc, and nickel.

- **Sulphate and Mineral Release:** The leaching process can increase sulphate, calcium, and mineral content, which may make the water taste metallic, appear cloudy (turbid), or exceed safety standards for human consumption.
- **Interaction with Disinfectants:** If water containing disinfectants (like chlorine) comes into contact with new cement surfaces, the leaching of pollutants—including aluminum and chromium—can increase significantly. Springer Nature Link

2. Groundwater Disruption and Physical Damage

- **Alteration of Flow Patterns:** Deep foundations, pilings, and retaining walls can act as barriers that disrupt natural groundwater flow, causing water to rise upstream of the structure or reducing the supply (yield) to nearby wells.
- **Dewatering Risks:** During the construction of concrete structures (e.g., in deep excavations), contractors may pump out groundwater. This "dewatering" can temporarily or permanently lower the water table, reducing the yield of nearby private wells.
- **Creation of Contaminant Pathways:**Improperly designed or installed concrete foundations can create new, preferential pathways for surface pollutants to travel directly into aquifers, bypassing natural soil filtration. Preene Groundwater Consulting

3. Structural Vulnerabilities

- **Porosity of Old Infrastructure:** While concrete is generally durable, older concrete tanks or wells can develop cracks, allowing surface contaminants (bacteria, nitrates) to enter the drinking water supply.
- **Weakened Structure:** Soft groundwater can react with concrete, causing it to deteriorate over time, further increasing the potential for contaminants to leach into the surrounding ground. Springer Nature Link

The River Tas catchment is managed to reduce flood risk through a combination of local and national agencies.

- **Permit Requirements:** For works on or near the "Main River" sections of the Tas, you must apply for a Flood Risk Activity Permit from the **Environment Agency**. For "ordinary watercourses" (smaller tributaries), you must contact the Norfolk Rivers Internal Drainage Board (IDB) for consent.
- **Sustainable Drainage (SuDS):** All new developments must follow Norfolk County Council's drainage design standards, ensuring that surface water run-off does not exceed greenfield rates. Water Management Alliance

9.8 River Catchment Area

Sub-site 7A is within 100m of the river Tas tributary, **Sub-site 7B** is within 15m of the river Tas tributary and **Sub-site 7C** is also within 100m of the river Tas tributary. **Sub-site 7E** also lies within the River Tas catchment.

A highly protected chalk stream with significant environmental and ecology benefits.

An area already subject to environmental pressures including nutrient enrichment, sedimentation, and chemical pollution. Development risks exacerbating these issues through land disturbance, runoff, and loss of riparian buffers, undermining efforts to improve water quality and aquatic habitats.

Norfolk Rivers Trust has confirmed the presence of breeding colonies of white clawed crayfish in the Tas and its tributaries. The direct hydrological connection between land parcel 7A and the Tas, and its catchment area, posed a significant risk to the hydrology of the Tas and the white clawed crayfish.

Chapter 10: Cultural Heritage

Introduction

East Pye Solar's own documents state there are multiple Listed Buildings located within 3km of Site 7 however this isn't just about individual residents and buildings, this is about the impact to an area rich in heritage buildings, agricultural heritage, character of the landscape and the environment of this vast site, South Norfolk and the county of Norfolk itself where people visit for the heritage it offers.

East Pye's own documents play down the importance of this heritage area by describing as follows:

'Due to their prevalence in the area, Grade II Listed Buildings are reported up to 100m only….Any Grade II Listed Buildings that are pertinent to the assessment of likely significant effects that are over 100m are discussed in Chapter 9'.

It's like saying that only some matter, whilst others are insignificant. Instead of acknowledging the area as a significant heritage asset.

Grade II listed within 100m of sites:

- Grade II Listed Building 'Wood Farmhouse', 30m south of sub-Site 7C;
- Grade II Listed Building 'Grove Farmhouse', 45m south-west of sub-Site 7C;
- Grade II Listed Building 'Manor Cottage', 55m north of sub-Site 7D;
- Grade II Listed Building 'Manor Farmhouse Barn', 65m north-east of sub-Site 7D;
- Grade II Listed Building 'Manor Farmhouse', 70m north of sub-Site 7D;
- Grade II Listed Building 'Hill Cottages', 85m north of sub-Site 7D;
- Grade II Listed Building 'Former Quaker Meeting House', 100m south-west of sub-Site 7A;

Grade II* Listed according to East Pye Solar

- Grade II* Listed Building 'Oaks Farmhouse', located 180m east of sub-Site 7L;
- Grade II* Listed Building 'Remains of Church of St Mary', 330m north-west of sub-Site 7D;
- Grade II* Listed Building 'Old Hall', 600m north of sub-Site 7D;
- Grade II* Listed Building 'The Old Rectory, 670m north-west of sub-Site 7D;
- Grade II* Listed Building 'Church of St Mary the Virgin', 680m north-west of sub-Site 7D;
- Grade II* Listed Building 'Remains of Church of St Mary', 760m north of sub-Site 7C;
- Grade II* Listed Building 'Oaks Farmhouse', 1.2km east of sub-Site 7J;
- Grade II* Listed Building 'Church of All Saints', 1.3km south-east of sub-Site 7L;
-

Grade I listed according to East Pye Solar

- Grade I Listed Building 'Church of St Margaret', 920m south of sub-Site 7B;

- Grade I Listed Building ‘Church of St Mary’, 935m north-west of sub-Site 7A;
- Grade I Listed Building ‘Rainthorpe Hall including Garden Wall with Gate and Gate Piers’, 1.6km north-west of sub-Site 7A. The Registered Historic Park and Garden ‘Rainthorpe Hall’ is located 1.5km north-west of sub-Site 7A, as associated with the Grade I listed building mentioned above;
- The Scheduled Monument ‘Camp in village’ is located 870m north-west of sub-Site 7A.

There are no Registered Battlefields within 2km of Site 7.

Saxlingham Nethergate

The name “Saxlingham” indicates ‘the home of the folk of Seaxe’ and was first mentioned in an Anglo-Saxon will of 1046, although evidence has come to light of an earlier Roman Villa to the north of the parish. Saxlingham Thorpe could have been a later Danish/Viking settlement, as the names suggest or English, since ‘thorpe’ means a ‘subsidiary settlement’. Indeed Saxlingham Thorpe was formerly ‘Uppergate’ as distinct from Saxlingham Nethergate which derives from the old English for “Lower Street”. The part of the village now known as Saxlingham Green has always been part of Saxlingham Nethergate, and was known as “Eastgate Green” at least as late as 1871.

Saxlingham Green probably developed as a typical ‘green village’ as a settlement of small farms surrounding a green on which all had common rights. It probably began as a later medieval ‘hiving-off’ from the original village, the initial clearing of The Green itself being carried out communally.

The 20th Century has seen the increased popularity of the area as a prime commuter location lying as it does in attractive country surroundings only a few miles from Norwich and other major transport routes to the south. Many villages and hamlets lying south of Norwich have evolved in this way as the mobility of the car has encouraged commuting to major centres of employment. This trend has been accompanied by a gradual reduction in employment opportunities within the villages themselves and surrounding countryside.

The effect of these trends in the villages has been a gradual decline of the traditional infrastructure such as village shops, post office, pubs, and local industry connected to agriculture. House values have generally risen due to the attractiveness of the location to the extent that young people from the village itself can rarely afford the housing within it and so have to move away, leading to yet further reduction in things like leisure facilities.

Saxlingham Green provides a typical example of these trends. The results of the change in farming practice and major shifts in wealth have led to dramatic changes in property ownership. Most property is now owner occupied, cottages have been amalgamated and extended, farm houses generally no longer contain farmers, stables and barns have been converted and at the end of the 20th Century it is difficult to see how significant further development could be accepted without damaging the essential character of the area. The Saxlingham Green Conservation Area was first designated in 1973.

Character Assessment

Saxlingham Green is defined more by the natural elements in the landscape than by the buildings within it. While there are a number of fine historic buildings important in their own right, they are secondary elements and are often lost behind trees and hedges. Whilst the appraisal looks at the two elements separately, the essential character of the area is partly generated by the interaction of these two components.

Saxlingham Green occupies a plateau site to the south east of Saxlingham Nethergate, and is set amongst a rural agricultural topography of a dissected plateau typical of this part of South Norfolk.

Hempnall and its Setting

Hempnall is the largest of a series of small hamlets and villages located in a farming landscape approximately 9 miles to the south of Norwich, and about 2 miles east of the A140. The regular field system aligned on Pye Street is a notable feature in the landscape. It is located on a tributary of the river Tas where several roads join. There is also a system of footpaths which give access to the surrounding hamlets and villages. The presence of isolated settlements associated with commons is very characteristic of this part of Norfolk.

The core of the settlement appears to be the junction of Mill Road, Bungay Road and The Street with an open space at the meeting point, the stream crossing and the church. There are suggestions that this may have been the market site and possibly the site of a mill. The roads, especially The Street, appear characterised by scattered late medieval and post medieval farms, with infilling occurring through the 19th and 20th centuries to produce a linear settlement.

The village has developed a more nucleated settlement form mainly as a result of post-war estate development to the east of Broaden Lane and east of Field Lane. The village has also experienced significant infill development. Elsewhere in the parish, development has occurred in the form of isolated clusters of housing along Field Lane (south of the village), Lundy Green, Road Green, Silver Green and isolated ribbon development at Hempnall Green. The remainder of the parish displays a dispersed settlement pattern comprising individual dwellings and farmsteads.

The impact of the village from the north and west is subdued by the undulating landscape, the meandering roads and the presence of trees and hedges. From the south, the village is seen nestling in the water meadows, with roofs of the taller buildings breaking through the greenery.

From the west, the approach is more open and level and the tower of St Margaret’s Church is a prominent feature in the landscape. The village retains some local services and businesses within the centre, with a flourishing school and village hall, although two of the surviving public houses have been converted to dwellings.

Conservation Area Boundary

The parish of Hempnall contains 58 listed buildings of which 22 are currently within the Conservation Area. The current Conservation Area boundary is irregular in form. It contains the Street in its entirety, part of Mill Road and Bungay Road to the south and east. It also encloses part of the water meadows to the south of The Street and the playing field to the north, together with a section of Fairstead Lane and Broaden Lane which lie to the east of the village.

It is suggested that the boundary be reviewed by adding part of the farm buildings on Bussey's Loke and the field and extension to the churchyard opposite.

Street Patterns and Historic Grain

The historic core of the village focuses on The Street and is characterised by one plot depth development which is particularly noticeable on the south side with the water meadows behind.

On the north side the line is broken by the playing field and Bussey's Loke. The Street has good tree and hedge planting, especially along the road frontage which contributes to the rural character of the area. There are also subtle curves to the road which gently slopes from west to east thus creating interesting views and vistas, the eastern-most one eventually being terminated by St Margaret's Church. To the west The Street divides into Fairstead Lane, and Broaden Lane with the War Memorial marking the junction.

To the south, the buildings more tightly define Mill Road until it eases to the left at the approach to the main junction. Further east the character varies with earlier buildings close to the road while later ones lose the definition of the street by being set back.

The special character of the Conservation Area is derived from the setting of a variety of historic buildings in an attractive and varied street pattern set in a river valley landscape. Glimpses of the wider landscape can be seen through the gaps between buildings and beyond the major open spaces within the village. This contact with landscape coupled with the many mature trees and strong hedge lines, contributes to the character and appearance of the area.

In addition, there are numerous attractive screen walls, particularly around the churchyard and parsonage, which all add considerably to the townscape quality. The locations of buildings in relation to The Street is extremely varied and generates an interesting matrix of irregular and varied spaces.

The whole area is also criss-crossed by a network of footpaths and lanes which provide a degree of pedestrian "permeability" through the village and more modern pedestrian paths have been added to connect the new housing developments to the north of Broaden Lane and to the south of Field Lane.

Fairstead Lane

The 17th century Krons Manor marks the entrance to the area at the western end which is an attractive route lined with hedges and trees and the brick boundary wall to the house. The

converted barns add a touch of “order” and leads the view to the Parish War memorial at the junction.

The cottage to the east, Lower Croft beyond and the later houses across the road,contribute to the setting of the Memorial and the trees and hedges softens the effect. The impressive Thatched House and garage on the south side make a positive contribution.

Traditional Materials and Architectural Details

A range of traditional building materials and details typical of the South Norfolk area are found in the built fabric of Hempnall.

Roofs are mostly of red or black clay pantiles, but there are notable examples of thatch, slate while plain tiles remain on the old village hall and lead on the Church.

Walls are mostly brick, some colourwashed, with render, covering timber frame or clay lump.

The Church is in flint. The number of fine brick and flint walls is a particular feature of the area, with iron railings and gates adding to the interest.

Older sash or casement windows survive on the listed buildings but elsewhere many have been replaced with modern equivalents which lack the same interest and character.

Ground surface materials are generally tarmacadam.

In terms of street furniture the area around the village sign includes a traditional telephone kiosk and road sign but other cabinets and elements have been added in a random way.

The listed war memorial furniture lies on a green at the junction of The Street, Fairstead Lane and Broaden Lane.

Natural Character and Open Spaces

There are a number of open spaces, and trees which make an important contribution to the landscape quality of the Conservation Area, and these are indicated on map Townscape and Natural Character Map.

The important “green” open spaces can be listed as the school playing field to the north of The Street, St Margaret’s Churchyard, the grazing land to the north of the village hall and the triangle of space containing the War Memorial lying to the west. The water meadows play a less obvious role, but the trees are valuable as a backcloth to the buildings on the south side of the street.

The potentially important open space at the junction of The Street with Mill/Bungay Roads is dominated by a car dealership garage adjacent to the bridge.

The presence of mature trees, hedges and areas of grass all add greatly to the rural character of the area. There are particularly fine mature trees at the eastern end of The Street and at the start

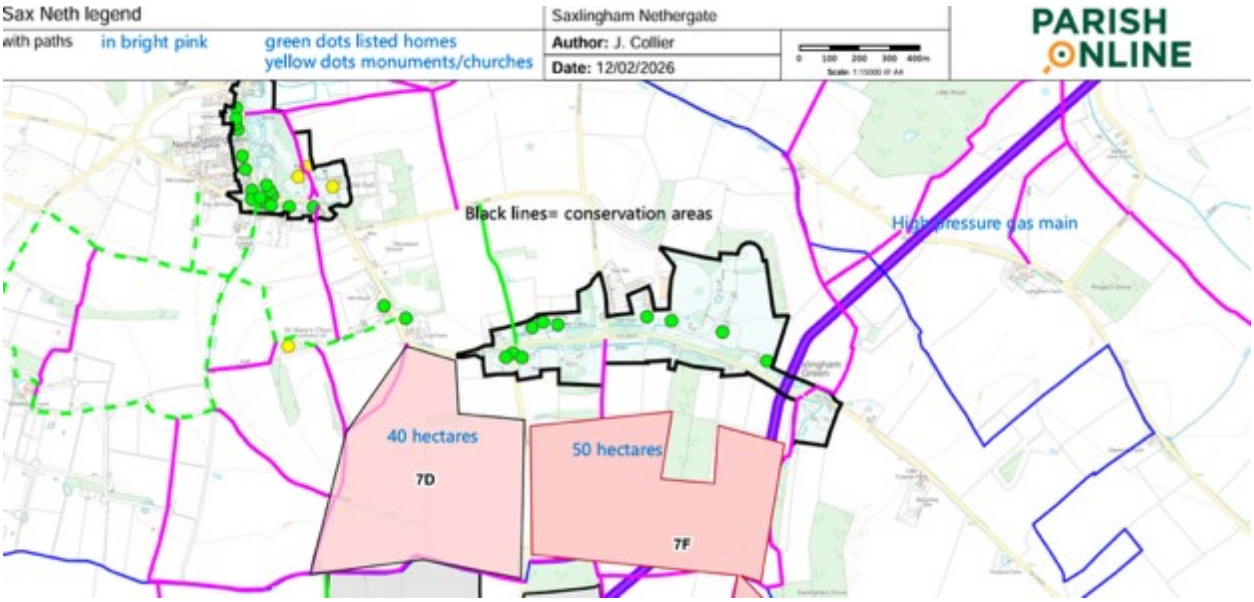
of Fairstead Lane, within the churchyard and the large gardens of the listed farmhouses such as the Parsonage, Manor Farmhouse, the Hollies and Willows. There are also important hedges which form a green barrier to the roads especially at the eastern end of The Street but also along the Bungay Road. Most of the new infill development has been planned to enable most of the existing trees to survive and in many cases additional planting has been carried out.

But there is considerable scope for additional planting to replace trees lost over time.

The meadows have a particularly special landscape quality of mature trees and hedgerows following the line of the drainage ditches all in a setting of lush meadow grass. The sewage pumping station has been surrounded by evergreen planting which is at odds with the rest of the area.

10.1 Impacts to Conservation Area

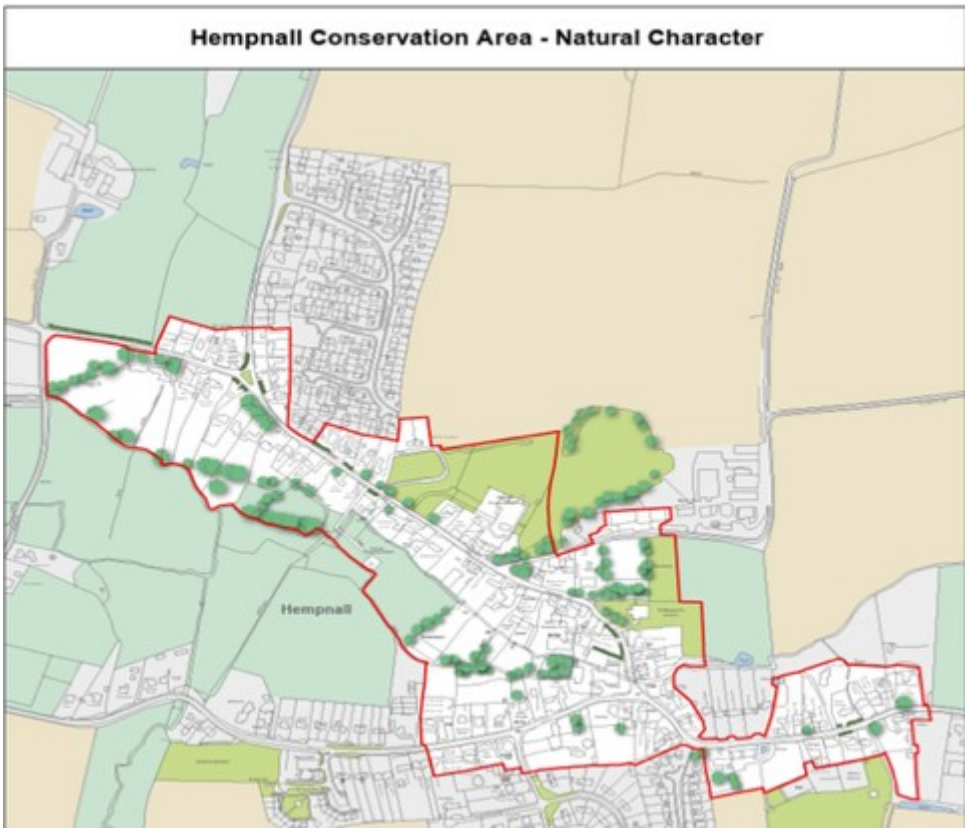
The proposed panels in sites 7D and F will dominate the southern boundary of the **Saxlingham Green Conservation Area** and destroy the attractive and unspoilt southern setting of the conservation area



Conservation Area of The Green, showing close proximity to Plots 7D and 7F

Hempnall contains 51 listed buildings that are recorded in the National Heritage List of England. Of these, there are one Grade I listed and fifty Grade II listed properties.

The Conservation Area is at the heart of the village with St Margarets the Virgin Grade I listed place of worship and the War Memorial



10.2 Impacts to Setting of Conservation Area

Saxlingham Nethergate

The relationship of the solar panels in sites 7D and 7F to the Saxlingham Green Conservation Area are all too clearly shown on the map in section 10.1 above. The approach to Saxlingham Green from the village of Hempnall will be through an avenue of solar panels that will destroy the current rural character of the road and replace it with an industrial landscape. The proposed sub-station on site 7F will inevitably be a prominent feature in the landscape further eroding the rural character of the setting of the conservation area.

Hempnall

Fairstead Lane extends into the Hempnall Conservation Area, with layout and buildings that contribute to the historic and rural village character. Views along the lane, mature planting and the mix of historic homes help define its special quality.



Travelling west along Fairstead Lane past two Grade II listed buildings, The Thatched House and Krons Manor, with associated barns now converted, the Conservation Area terminates at the junction with The Krons. Just 350m further down Fairstead Lane, solar panels would tower over both sides of the Lane, Sites 7B and 7C. This stark reality would totally dominate the landscape for a further 700m. The contrast over such a short distance would be extreme and would degrade the whole feel of the conservation area.



Krons Manor on Fairstead Lane located 450m from site 7B and 7C

10.3 Impacts to Grade 1 Listed Churches



St Margaret the Virgin, Hempnall at Grade I listed place of Worship

10.4 Impacts to Grade II* and Grade II Listed Buildings

Saxlingham Nethergate

There are 10 grade II listed buildings within the Saxlingham Green Conservation Area and a further 32 grade II listed buildings throughout the village, three of which are grade II*. Many of these properties are in very close proximity to the road and are timber framed with little or no foundations. Damage caused by vibration from Indivisible loads cannot be mitigated.

Below is a table of the buildings that will be affected by the route and, in some instances, the proposed solar land parcels.

Old Hall is a grade II* listed Manor House dating back to the 17th century on Church Hill with grounds abutting the road. It has a medieval moat one metre from the road and an ancient swimming lake approximately three metres from the road. The Building is listed under the Planning (Listed Buildings and Conservation Area) Act 1990 as amended for its special architectural or historic interest.

Photo of Old Hall below



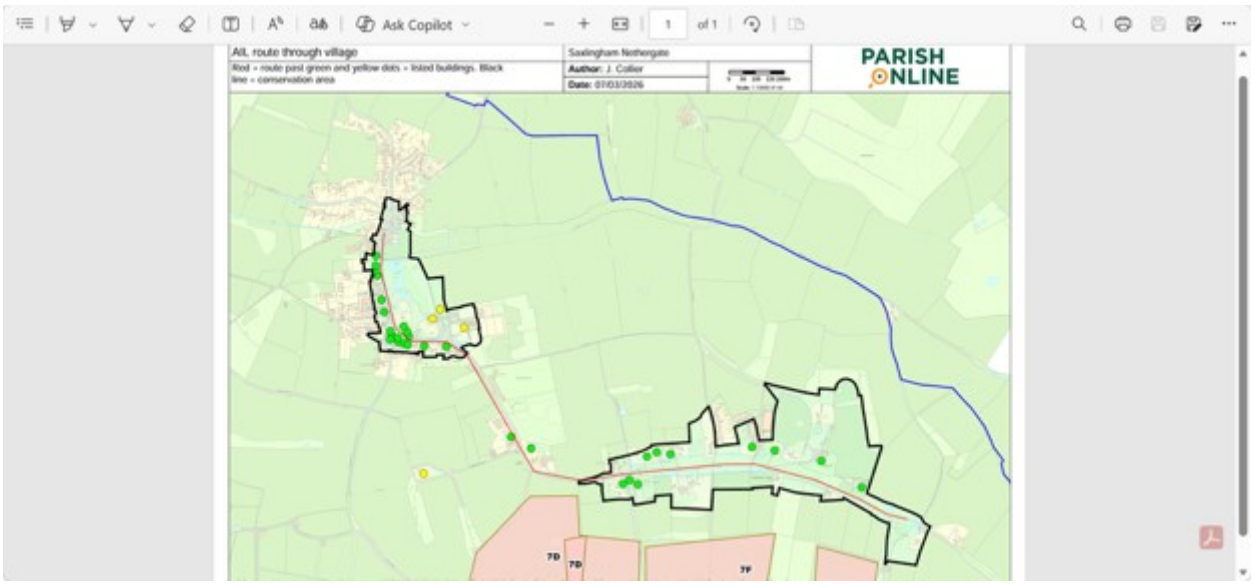
In addition to those on the green, along the proposed AIL route through the village are 24 Grade II listed buildings, most of which are timber framed, with some thatched and many with no foundations.

An example below of a listed building in very close proximity to the proposed AIL route.



Several unlisted properties look directly across to the two sites. At least one of these properties is timber framed clay lump dating back to C1730.

Three grade II listed properties are located at the south-west end of the Green and look directly across the proposed solar panels in 7D and 7F (less than 150 m).



Above is a map of the listed buildings that line the proposed AIL route through Saxlingham Nethergate.



The remaining 7 grade II listed properties within the Conservation Area are on the north side of the road running through Saxlingham Green.



The proposed panels on land parcel 7D will have a negative impact on setting of the Remains of the Church of St Mary, a Grade II* listed building located some 300m to the north-west of site 7D and Hill House, a grade II listed building, which is on the AIL route and also less than 500 metres to the north of site 7D.



Grid ref: TM2380 9660

The photo above shows Manor Farmhouse, a C16 Grade II listed timber framed dwelling (226644) on the junction of The Green and Broaden Lane. Both an AIL route and HGV route. The house is very close to the road and the bend in the road and would be heavily impacted on (noise, vibration, damage to road verges and possibly their property) during construction, with AIL route and a construction workers site within close proximity. The damage to this, and other properties cannot be mitigated. The panels will be visible to this property.

Manor Cottage (photo below) a C17 grade II listed timber framed dwelling (226625) on the north west corner of Broaden Lane and on the junction of The Green, will be heavily impacted on during construction due to the close proximity to the road and the bend. The construction workers site is to the south of this property in close proximity. The panels will be visible to this property.

The road between Manor Farmhouse and Manor Cottage is narrow with no verges, and on a bend.



The drone photo below shows the bend and narrow road between the two houses that will be subjected to heavy goods vehicles travelling on the right hand bend and the AIL route of the left hand fork onto the green (courtesy of Lockwood Chartered Surveyors).



Manor Farmhouse Barn a C17 grade II listed timber framed dwelling (226644) is on the north east side of Broaden Lane and would be heavily impacted on during construction with AIL route, and the panels will be visible on completion.

Saxlingham Hall is a C18 grade II listed (226638) nursing home on the Green. The residents and staff would be impacted on during construction due to the AIL route and upheaval of the green track which is an unclassified 3.5 metre wide road. This is much used for residents in wheelchairs and walkers. There is no facility for anyone to move aside when traffic approaches. Currently not an issue as it is a very quiet lane.

Queen Margaret Cottage (226643), Orchard Cottage (226642) and Green Farmhouse (226641) are all C16 Grade II listed timber framed dwellings towards the western entrance to The Green on the northern side of the lane, and will be impacted by the heavy traffic, noise, vibrations and the damage to the verges at the end of their drives.

Drone photo below of AIL route on The Green travelling east (Courtesy of Lockwood Chartered Surveyors).



Hempnall

Hempnall has fifty Grade II listed properties within the Parish boundaries

The impact to some of the properties as a result of the East Pye Solar scheme will be devastating as fields of solar will surround them on all sides or be impacted by the transport routes causing vibration and dirt to sensitive buildings

In addition to the visual impact, many of the listed buildings that will be directly impacted also rely on private water supplies for their drinking water as well sewage systems for waste.

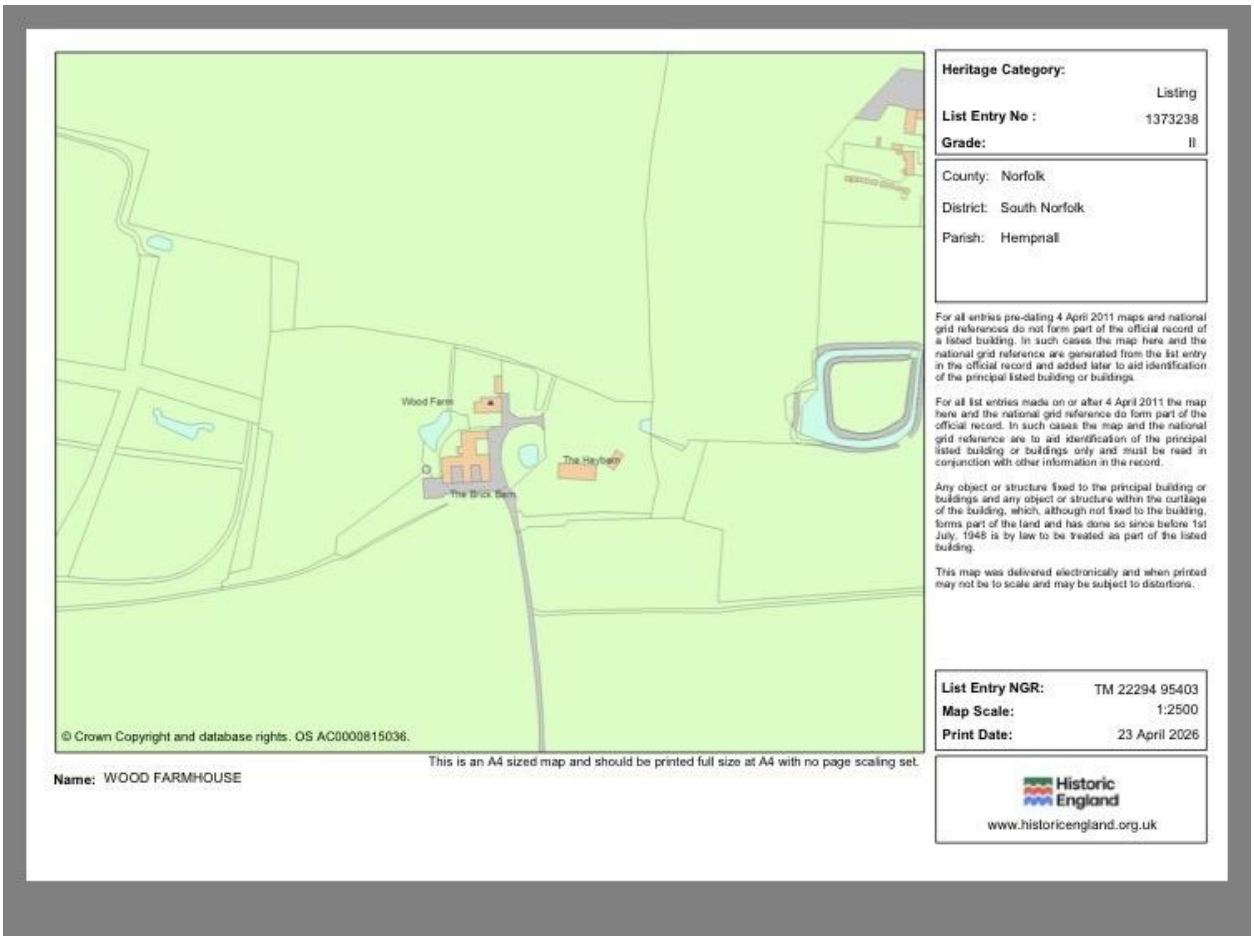
Wood Farmhouse is at the Sub-site 7C, is a grade II listed Farmhouse. (Heritage Statement/2/HLM/Sept 2021, https://docs.planning.org.uk/20250424/20/SV4EWLOQHJN00/covr4xwnjzmr193o.pdf).

TESCO 08:23 66%
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Off-market

Wood Farm, Fairstead Lane, Hempnall, Norwich, NR15 2RF

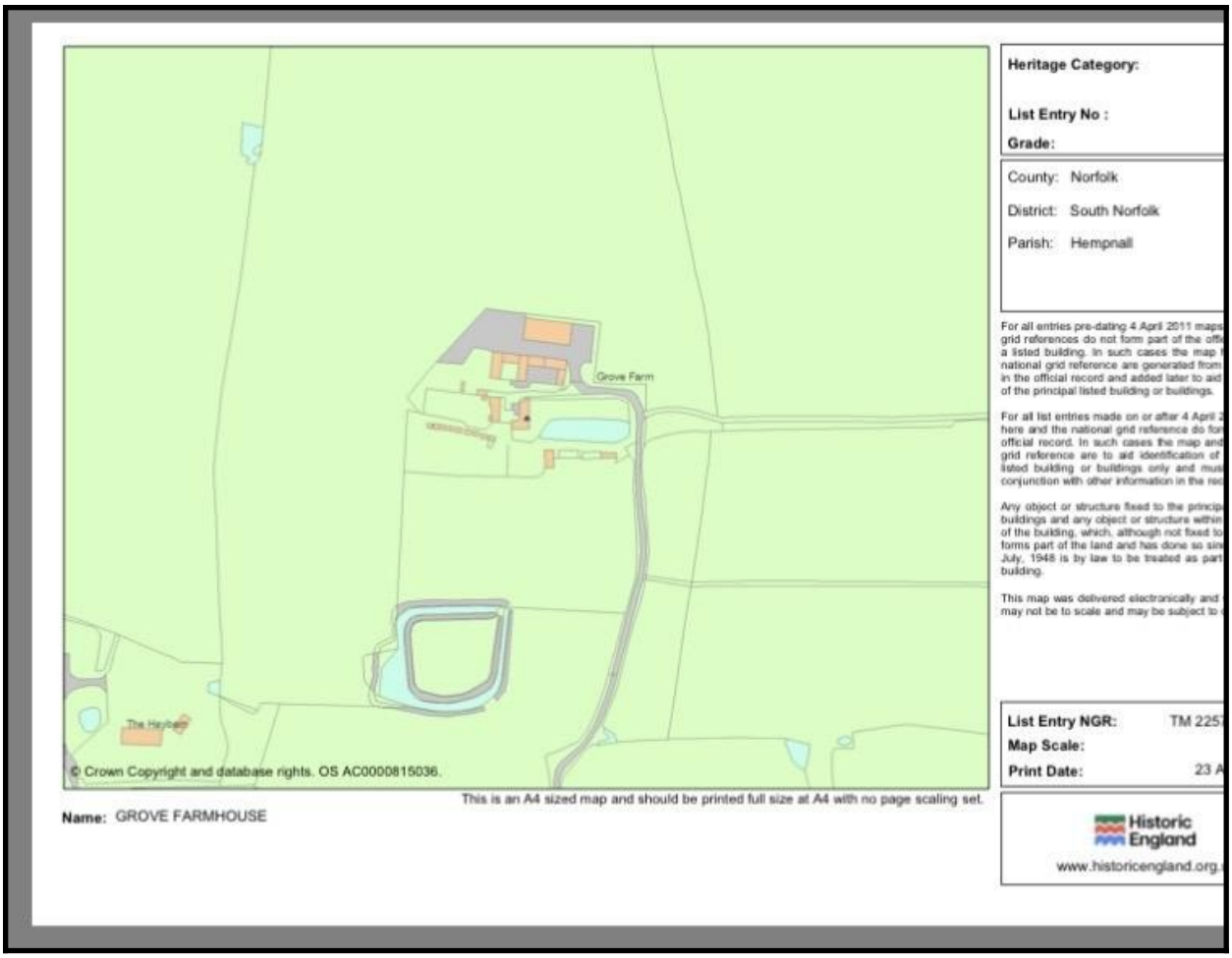


Historic England 04/2026

Grove Farm is located at land Site 7C it is a Grade II listed property.



https://historicengland.org.uk/listing/the-list/list-entry/1050330



Historic England 04/2026

Wood Farm and Grove Farm would be impacted significantly by the solar arrays altering their landscape setting and views from rural to industrial. The solar farm will significantly alter the rural character of the area. There would be vibrations when installing the solar equipment and impacts from heavy vehicles along single track rural country lanes which would additionally alter the area's character.

Limetree Farmhouse, Fairstead Lane will be surrounded by panels on Sub-Site 7A to the west and Sub-site 7C to the northeast and Sub-site 7B to the southeast.



Limetree Farmhouse, Fairstead Lane

Listed Buildings within the Parish of Hempnall:

- Park Farmhouse, Barondale Lane - Grade II
- Tye Cottage, Bungay Road - Grade II
- Thackery House, Bungay Road - Grade II
- The Willows, Bungay Road - Grade II
- Willows House, Bungay Road - Grade II
- Church Of St Margaret, Church Plain - Grade I
- Lord Nelson Public House, Church Plain - Grade II
- Grove Farmhouse, Fairstead Lane - Grade II
- Krons Manor, Fairstead Lane - Grade II
- Limetree Farmhouse Fairstead Lane - Grade II
- The Thatched House, Fairstead Lane - Grade II
- Wood Farmhouse, Fairstead Lane - Grade II
- Bush Farmhouse, Field Lane - Grade II
- Poacher's Cottage, Furze Road - Grade II
- The Firs, Furze Lane - Grade II
- The Haven, Furze Road, Grade II
- Home Farmhouse, Hempnall Green - Grade II

- Sycamore Farmhouse, Hempnall Green - Grade II
- The Grange, Hemphamm Green - Grade II
- Villa Farmhouse, Hempnall Green - Grade II
- Barn and Stable Range adjoining Three Feathers, Lundy Green - Grade II
- Chestnuts Farmhouse, Lundy Green - Grade II
- Grange Farmhouse, Lundy Green - Grade II
- Hempnall House, Lundy Green - Grade II
- Rose Cottage, Lundy Green - Grade II
- Three Feathers, Lundy Green - Grade II
- Townhouse Farmhouse, Lundy Green - Grade II
- Cottleston, Mill Road - Grade II
- Hempnall Mill Centre, Mill Road - Grade II
- The Chequers, Mill Road - Grade II
- The Poplars, Mill Road - Grade II
- Hempnall War Memorial - Grade II
- Moat Farmhouse, Road Green - Grade II
- Road Green Farmhouse, Road Green - Grade II
- Chestnut Farmhouse, Silver Green - Grade II
- Meadow Farmhouse, Silver Green - Grade II
- Silver Green Farmhouse, Silver Green - Grade II
- Yew Tree Farmhouse, Silver Green - Grade II
- Kirkstone, the Long House and Post Office, Church Plain - Grade II
- Manor Cottages, 1,2,3 and 4 The Street - Grade II
- Connaught House, The Street - Grade II
- Forge House, The Street - Grade II
- Lime Tree Cottage, The Street - Grade II
- Manor Farm Cottage, The Street - Grade II
- Manor Farmhouse, The Street - Grade II
- Parsonage, The Street - Grade II
- Pevensey House, The Street - Grade II
- Smithy Cottage and Priory Cottage, The Street - Grade II
- Stables North of Parsonage, The Street - Grade II
- The Hollies, The Street - Grade II

Lower Tasburgh

There are 33 listed properties in the parish of Tasburgh including the Grade I listed St Mary's Church however most are to the west of the A140.

Those directly impacted by East Pye Solar are within a few hundred metres of sub-site 7A which elevates so will be visible all year round including when trees are in leaf.

- Meadow View, Quaker Lane - Grade II
- Barn and Stables south of Meadow View, Quaker Lane - Grade II

- Former Quaker Meeting House, Quaker Lane - Grade II
- Tramps Hall, Fairstead Lane - Grade II
- Barn and Stables, Fairstead Lane - Grade II
- Hill Farmshouse, Ipswich Road - Grade II


View from the A140 looking East
7C


Photo taken Fairstead Lane, SW boundary of 7A looking NE. Site elevates towards NE of plot where visible tree line is reduced due to elevation.


Taken from the Countryman Pub, A140
facing East
7A


Stood on Fairstead Lane at the
south west boundary of 7A looking
towards the A140
The Countryman Pub
Text

10.5 Impacts to Listed Buildings

Extracts from [redacted] independent Heritage Impact Assessment report (inclided in BEPS WR Appendix)

6.38 **Sites 7A – _7C** propose several areas of solar PV arrays on a number of parcels of land
6.39 The **Countryman Public House** is a prominent building on the A140 Long Stratton Road with its wider setting to the east formed by the undulating and gently rising farmland of the Tas Rural River Valley. There are views to the east from the building towards site 7A where solar PV arrays are proposed as well as views from the site across open land towards the building to the west. Although there is likely to be some visibility of the solar panels in distant views, there are no historic connections between the use of the land and the building as a public house which is not considered to make any key contribution to its significance. It is therefore agreed that the proposed development will not have an adverse impact on its significance.
6.40 **Hill Farmhouse** has a prominent location at the junction of the A140 and Fairstead Lane. There are several ancillary farm buildings to the north and views to the east where the surrounding open and undulating farmland within the Tas Rural River Valley forms its setting. There are also views towards the west across the open farmland where the farmhouse and its ancillary buildings are appreciated within a rural landscape setting. A solar PV array is proposed on sub-site 7A on existing open land which rises to the east of Hill Farmhouse. Paragraph 9.43 of the submitted impact assessment states that *'There are no views of site 7A from Hill Farmhouse with views*

towards the farmhouse restricted to only its roofline from a limited range within sub-site 7A from where this does nothing to demonstrate the farmhouse significance. It is considered that the scheme will cause no harm to the significance of Hill Farmhouse'. However, an assessment of the setting of Hill Farmhouse shows that there are views towards the east from the front of the building along the access driveway where the rising ground of site 7A can be seen in conjunction with the farmhouse and outbuildings (see photos 96 & 97) . As a consequence of historic associations between the farmhouse and this surrounding open agricultural land which forms its setting, this positively contributes to its overall significance. The solar panels will be visible on the skyline and taking account of their scale, height and movement will introduce incongruous, industrial features on land which form its setting. It is therefore concluded that this will cause harm to the significance of Hill Farmhouse which is considered to be less than substantial and the lower end of the scale.

6.41 **Tramp's Hall** and **Barn immediately east** are located in a secluded position, surrounded by mature trees and vegetation. The barn is seen in views along Fairstead Lane, but the hall is set well back within the site and is only glimpsed when passing the entrance driveway. There are distant views across open farmland towards the west where the roof of the barn is seen in the wider rural setting. However, there are no views towards site 7A from either of these buildings and it is agreed that the proposed development will not have an adverse impact on the significance of the hall or the adjacent barn.

6.42 The **Former Quaker Meeting House** occupies a secluded position on the south side of Fairstead Lane and is mainly appreciated in views from the entrance driveway on Quaker Lane. Although the proposed solar panels are in close proximity, it is only the roof that is visible in views towards the south which is seen against a backdrop of mature trees and it is agreed that the proposed development will not result in any adverse impact on its significance.

6.43 **Wood Farmhouse** is experienced within a wide, open landscape setting, particularly the open farmland to the north and south, which positively contributes to its significance due to the historic relationship between the use of this land and the traditional rural farmstead buildings. A solar PV array is proposed on site 7C on land to the north of Wood Farmhouse. Paragraph 9.49 of the submitted impact assessment states that *'due to the retention of the open farmland closest to the farmhouse, the solar panels will not be prominent within any views from or of Wood Farmhouse and they will not encroach into the immediate setting of the listed building'*. The assessment also states that *'the proposed planting in the form of woodland planting, grassland borders and linear screening between the listed building and the solar PV arrays will in the medium to long term, effectively remove any views of these elements from the heritage asset'* _and concludes that *'the scheme will cause no harm to the significance of Wood Farmhouse'*. However, even though there is a degree of setback between the farmhouse and the proposed solar panels, taking account of their height

and movement, they will be visible on the horizon in views from, as well as towards, the farmhouse. Furthermore, the proposed mitigation measures in the form of planting, will not provide sufficient screening of the panels for a considerable number of years and more importantly, will have an adverse impact on the setting of the farmhouse by creating a sense of enclosure and severing the historic visual relationship with the open farmland beyond. It is therefore concluded that this will cause harm to the significance of Wood Farmhouse, which is considered to be less than substantial and the lower end of the scale.

6.44 **Grove Farmhouse** is also experienced in a rural agricultural setting with open farmland to the north and south, pond to the east and several attractive outbuildings to the north and west. A solar PV array is proposed on site 7C on land to the north of Grove Farmhouse, with the scheme being set back and adjoining land being retained as farmland. Paragraph 9.51 of the submitted impact assessment states: *'It is possible that solar PV arrays within sub-site 7C may be visible to the north-east of Grove Farmhouse. However, these views will be glimpsed between the existing plantation to the east and the new woodland planting to the north. There will be a buffer of new grassland to the east and north-east that, although not screening the solar PV arrays from view, will soften the prominence of any built e;ements within the scheme.' Paragraph 9.52 states: 'There will be minor alterations to the setting of Farmhouse through the presence of a small section of the scheme in views to the north-east of the property. The majority of views from and of the listed building will remain unchanged. Elements of the listed building's setting that inform its significance are generally limited to the immediate grounds of the farmhouse including its yard and associated structures, although the wider agricultural surroundings provide a connection to the historic and current context of the listed building as a farmhouse and do somewhat highlight the rural nature of the building's design and intended purpose. However, it is not considered that the wider setting informs the significance to any meaningful degree and the presence of a small section of the scheme in one wide vista from the property will not result in harm to the heritage asset's significance or the ability to appreciate this.'*

6.45 The setting of Grove Farmhouse is wide and positively contributes to its significance due to the historic relationship between the use of the surrounding land and the traditional rural farmstead buildings. Furthermore, it is important to emphasise that this has remained unchanged and undeveloped over time. The submitted assessment is therefore considered to have undervalued the contribution of the setting of Grove Farmhouse to its overall significance. Even though the open farmland closest to the farmhouse is to be retained, taking account of the height and movement of the proposed panels, visibility of such alien and industrial structures is considered to be harmful to its open agricultural setting. Reference is also made to new woodland planting to the north and such mitigation measures are also considered to be harmful by severing the historic visual relationship with the open

farmland beyond. It is therefore concluded that the proposed development within site 7C will cause harm to the significance of Grove Farmhouse, which is considered to be less than substantial and the lower end of the scale.

6.46 **Sites 7D – _7H** propose several areas of solar PV arrays on a number of parcels of land, along with a 132kV substation within site 7F. **Manor Cottage**, **Manor Farmhouse** and **Manor Farmhouse Barn** are located to the north of sites 7D and 7F, and form an important group of Grade II listed buildings at the west entrance to Saxlingham Green Conservation Area.

6.47 **Manor Cottage** located in a prominent corner position, is appreciated in many views to the south, west and north and as a former farmhouse there are historic associations with the open farmland which forms its setting to the south and positively contributes to its significance. There are open views across this farmland from the boundary of the cottage (see photo 115). Solar PV arrays are proposed on site 7D to the south and site 7F to the south-east. Paragraph 10.45 of the submitted impact assessment states *'Embedded mitigation in the form of setbacks will ensure there is no intervisibility between Manor Cottage and built elements of the scheme within sub-site 7D and beyond. The scheme will result in no harm to the Listed Building.'*

6.48 **Manor Farmhouse** is also located in a prominent corner position with key views of the building to the west and to the north-east with open farmland to the south forming its setting and the building being seen in views towards the north across the open landscape (see photo 119). Also a former farmhouse, there are historic associations between the building and the surrounding land which forms its setting, positively contributing to its significance. Solar PV arrays are proposed on site 7D to the south-west and site 7F to the south. Paragraph 10.43 of the submitted impact assessment states *'Although there is no intervisibility between site 7 and Manor Farmhouse, it is situated in close proximity to sub-site 7D. Due to this, setbacks have been included in the design of the scheme and the part of this sub-site closest to the listed building will remain as open land. The nearest built elements of the scheme (solar PV arrays) will be situated at a distance of nearly 300m to the south-west and will not encroach into the setting of the farmhouse. There will be no harm to Manor Farmhouse's significance.'*

6.49 **Manor Farmhouse Barn** adjoins the farmhouse and historically would have been part of the farmstead. Although occupying a slightly more secluded position there are views of the roof and gable end in views to the east and looking north from the open farmland, with visibility increasing during the winter months. Solar PV arrays are proposed on site 7D to the south-west and site 7F to the south. Paragraph 10.44 of the submitted impact assessment states *'The setbacks incorporated into the design of the scheme within sub-site 7D will ensure that no solar PV arrays or other built elements will be visible from the barn and there will be no impact on its setting.*

Therefore, it is considered that there will be no harm to the significance of the listed barn'.
6.50 Although the area of site 7D closest to Manor Cottage, Manor Farmhouse and Manor Farmhouse Barn is to remain undeveloped, the conclusions noted in paragraphs 6.47 to 6.49 above, focus on views towards the site looking south from these listed buildings. However, when they are approached towards the north along Broaden Lane, their setting is wide and open, with the buildings being visible on the horizon amongst surrounding trees and vegetation, with visibility increasing in the winter months. Taking account of the height and scale of the proposed solar panels, which are intended to be located immediately to the west of Broaden Lane, the ability to appreciate these buildings in their wide, open and undeveloped agricultural setting will be lost, being obscured by alien and industrial features in a rural landscape. Furthermore, paragraph 10.48 of the impact assessment refers to additional tree and hedgerow planting and concludes that once matured, built elements of the scheme within these sub-sites will be effectively screened from surrounding heritage assets. However, apart from taking a considerable number of years to effectively screen the solar panels, these mitigation measures in the form of planting will in themselves have an adverse impact by creating a sense of enclosure and severing the visual relationship between the buildings and their open setting. It is therefore concluded that the proposed development will have a harmful impact on the significance of Manor Cottage, Manor Farmhouse and Manor Farmhouse Barn, which is considered to be less than substantial at the lower end of the scale.
6.51 As a former farmhouse, **Hill Cottages** are mainly appreciated in views towards the east but they are also seen in views across open farmland to the west and to the south, which forms their wider setting (see photos 122-125). Solar PV arrays are proposed on site 7D to the south of the property. Paragraph 10.46 of the submitted impact assessment states *'Setbacks have been designed into the perameters of sub- site 7D and the northernmost field, in closest proximity to Hill Cottages, will not contain any solar PV arrays or other built elements. As such, there will be no visibility of any parts of the scheme beyond the new landscaping initiatives in this field and there will be no impact to the Listed building's significance. There will be no harm to the listed building resulting from the scheme'.* Even though the area closest to Hill Cottages is to remain open and undeveloped, taking account of the height and movement of the solar panels, they will be visible in views along with the property, particularly to the south-west, introducing alien and industrial features within their rural agricultural setting. Any mitigation measures including tree and woodland planting will take a considerable number of years to effectively screen the solar panels and will also have a negative impact by creating enclosure and severing the visual relationship between the building and the surrounding open setting. It is therefore concluded that the proposed development will have a harmful impact on the significance of Hill Cottages, which is considered to be less than substantial at the lower end of the scale.

6.52 **Hill House** is slightly set back from the road with its chimneys and roof visible in views to the north (see photo 126). It is mainly appreciated from its setting to the west, with the surrounding open and undeveloped farmland to the south forming its wider setting. Although it is separated from areas of open farmland by adjacent buildings to the south, as the taller and more prominent structure, there is intervisibility between the building and the site of the proposed solar panels, with the degree of visibility increasing during the winter months. Paragraph 10.47 of the submitted impact assessment states that no built elements of the scheme will be visible from Hill House and that there will be no harm arising from the scheme on its significance. However, taking account of the height and movement of the solar panels, they will be seen in views from Hill House to the south and from the site in views to the north towards Hill House. introducing alien and industrial features within this rural agricultural setting. Any mitigation measures including tree and woodland planting will take a considerable number of years to effectively screen the solar panels and will also have a negative impact by creating enclosure and severing the visual relationship between the building and the surrounding open setting. It is therefore concluded that the proposed development will have a harmful impact on the significance of Hill House, which is considered to be less than substantial at the lower end of the scale.

6.53 **Holly Cottage** was scoped out of further assessment in the submitted heritage statement as it was considered that it would not be impacted by the proposed development. However, it is located at the east end of the Saxlingham Green Conservation Area in an open setting where it is set back from The Green with open and undeveloped farmland to the north and south forming its wider setting (see photos 127-130). Solar PV arrays are proposed on site 7F on existing open farmland to the south of Holly Cottage. There are panoramic open views looking west where this site is visible along with Holly Cottage with intervisibility between the two increasing during the winter months. Taking the height and movement of the proposed solar panels into account, they will introduce alien and industrial features as a visual intrusion into this rural setting. Mitigation measures including tree planting will take a considerable number of years to effectively screen the solar panels and will also have a negative impact by creating enclosure and severing the visual relationship between the building and the surrounding open setting. It is therefore concluded that the proposed development will have a harmful impact on the significance of Holly Cottage, which is considered to be less than substantial at the lower end of the scale.

6.54 **Saxlingham Green Conservation Area** has a distinctive green and rural character with a strong sense of intimacy and enclosure formed by mature trees and vegetation with occasional buildings scattered along the road or set back from the open green spaces. There are occasional open views, particularly out towards the south, from within the Conservation Area, which provide important visual connections with the open and undeveloped countryside which surrounds and forms the setting of the Conservation Area (see photos 131 & 132). Approaching the Conservation Area

from the south along Broaden Lane from Hempnall, there is a distinct change in character, from a strong sense of openness provided by undeveloped farmland, to a cluster of buildings which create a sense of arrival and define the west entrance to the Conservation Area (see photo 133). Paragraph 10.39 of the submitted impact assessment refers to the proposed mitigation measures and states that *'These proposed landscaping initiatives will ensure that the scheme does not encroach onto the setting of Saxlingham Green by obscuring it from views within the Conservation Area itself. This will therefore maintain the rural agricultural character and appearance of the Conservation Area. The woodland and grassland planting will improve the surrounding outlooks to the west of the Conservation Area and will render impacts to the setting as negligible once matured.'* Paragraph 10.41 concludes that the scheme will cause no harm to the character and appearance, and/or significance, of Saxlingham Green Conservation Area. However, taking account of the height and location of the proposed solar panels within site 7D to the south-west of the Conservation Area, not only will the proposed planting take many years to provide any effective screening, but more importantly, it will sever the visual relationship between the Conservation Area and the open and undeveloped surrounding land which forms its setting and will result in the loss of the sense of arrival when approaching from the south. Solar panels are also proposed to the south of the Conservation Area within site 7F and although there is no specific reference to this in the submitted impact assessment, mitigation in the form of planting will also result in a harmful impact by severing the visual relationship between the Conservation Area and the surrounding open land in views out to the south. It is therefore concluded that the proposed development of sites 7D and 7F will have a harmful impact on the setting of Saxlingham Green Conservation Area which is considered to be less than substantial at the lower end of the scale.

6.55 **Sites 7I – _7L** proposes several areas of solar PV arrays on a number of parcels of land. **Oaks Farmhouse** is a high status, Grade II* listed building originating from the 16th century located in an isolated rural position to the east of site 7L, surrounded by open land which forms its setting and has historically remained undeveloped. Solar panels are proposed in relatively close proximity on existing open land on the west side of Woodton Road which is bounded by a low hedgerow. The submitted impact assessment acknowledges that sub-site 7L does contribute to the significance of Oaks Farmhouse and that there is intervisibility between the site and the listed building, but concludes at Paragraph 11.17 that the scheme will result in no harm to this heritage asset, noting that although there will be views of the solar PV arrays, proposed planting with screen them from the farmhouse once matured after approximately 15 years. However, although surrounded by some mature trees and vegetation, there are views out from the building across the surrounding open land to the south and to the west, along with views of the building towards the north and the east, with the degree of visibility increasing during the winter months (see photos 134-139). Taking account of the scale and height of the solar panels and their proximity to the west of the farmhouse, they will be highly visible in views from and towards the building, introducing alien and incongruous, industrial features within its setting, standing above the existing hedgerow which forms the site boundary. Furthermore, it is noted that proposed augmentation of existing boundary planting will not effectively screen the panels until maturity after around 15 years. However, it is also considered that the proposed mitigation measures, will in themselves have a harmful impact by severing the visual relationship between the farmhouse and the surrounding open land. Taking account of the high status of the building and its distinctly rural setting which has remained undeveloped for centuries, it is concluded that the proposed development of site

7L will have a harmful impact of the significance of Oaks Farmhouse. This is considered to be less than substantial, but at a moderate level.

10.6 Impacts to Pre-Modern Agricultural Landscape

Site 7 is made up of mulitiple semi-open and linked agricultural fields growing a rotation of crop including various cereals (wheat, barely, rye and corn) and oil seed rape.

These fields rely on circular nutrient management like using animal manure for fertiliser and incorporating fallow periods or planting recovery crops like pasture grass.

The fields have limited borders with some mature hedging, areas of woodland or orchards, water culverts and trees however are mainly open vistas visible from the A140, Hempnall roundabout, B1527, and the surrounding villages affected by site 7.

Due to hedging, wooded areas, trees lines, unfarmed bands around fields, natural ponds, unnamed water courses, the landscape supports high biodiversity and nature habitats.

Many 'at risk' or declining birds and protected mammals can be found on all sub-sites and across the Cable Route Corridors.

Countryside Stewardship areas:

Priority area for lapwing
Farm wildlife package area
Countryside Stewardship water quality area - high priority
Phosphate issues high priority
Climate change vulnerability buffer - medium and low
Arable assemblage farmland birds 3
grey partridge
turtle dove
lapwing
Environmental stewardship agreement entry level and higher level
Higher level stewardship target - Norfolk river valleys
Great Crested Newt strategic opportunity area

Various deer, hares, bats, owls, skylarks, lapwings, turtle doves and many other song birds and mammals rely on the open wildlife corridors and natural habitats for nesting, protection and feeding.

Industrialising these fields will not just change the natural vista of the rural landscape but will remove the wildlife corridors of free roaming mammals and the natural nesting environments for protected birds like the skylark that are found on all the fields and protected across the area.

Industrialising these fields will also remove a sense of belonging, remove the sense of rural living chosen by the people that live and work here.

Landscaping the Scheme to screen the panels and infrastructure will itself change the character of these Claylands.

Changing these fields from agricultural to industrial will also conflict with the Conservation Areas of local villages and the Claylands that are keeping the sense of belonging to the rural environment.

Site 7 is within the boundary of five parishes and acts as an area of tranquility.

Industrialising Site 7 across the vast acreage it covers will effectively remove this area as a significant rural environment.

This cannot be mitigated against.

10.7 Community Identity and Well-Being Rooted in Cultural Heritage and Historic Landscape

The community across Site 7 including the five villages that are impacted by the development of Site 7 was born out of agriculture and rural environments.

The Long Stratton area is surrounded by small hamlets and villages using the local facilities and forming the greater community of this developing village into a town.

However the whole area has been shaped by:

- Centuries-old agricultural landscapes;
- Historic field patterns and ancient hedgerows particularly seen across cable route 4;
- The visual presence of Grade I listed Churches often with round towers synonymous with East Anglia where bricks were in short supply so right angles were not possible to build;
- The Roman Pye road (A140) offers centuries of history and archaeological finds;
- Generational farming of land use;
- Shared cultural history of working the land;
- A community of multi generations that support each other and come together to celebrate events across the annual calendar including the Remembrance Day parades to the village war memorials.

This is not just a place where people live and the fields are not just scenery.

Rural communities are embedded far more than those in cities and larger towns.

They possess a distinct sense of identity, characterised by a deep, emotional connection to a specific, often intergenerational place.

The identity is built upon shared values, local traditions and agricultural heritage.

Chapter 11: Transport and Access

Introduction

The East Pye Solar is proposed to take 24 months at least to complete construction and with that includes considerable disruption across local road networks, footpaths and bridleways.

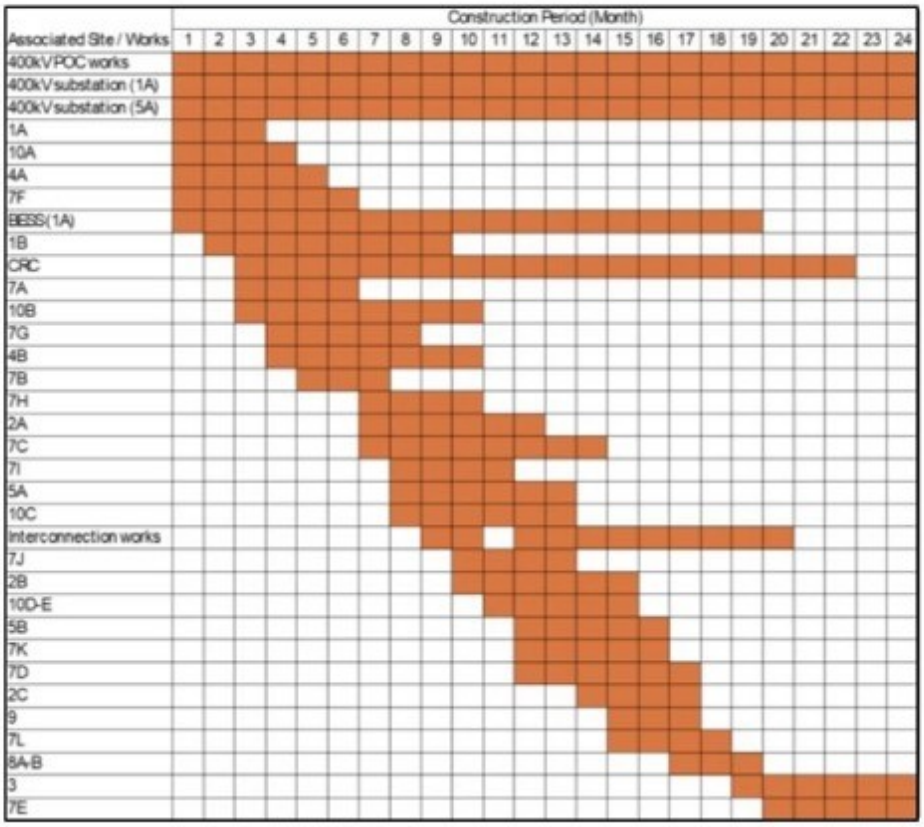


Figure 2.1: Indicative Construction Programme

2.5.2 The core construction working hours (not including start-up and shut-down works) are defined as:

- Monday to Friday from 07:00 to 18:00 (daylight hours permitting);
- Saturday from 08:00 to 13:30 (daylight hours permitting); and
- No Sunday or Bank Holiday working unless crucial to construction (for example, for trenchless crossings which must be continuous activity and the arrival and departures of workers and the delivery of AIL) or in an emergency.

2.5.3 Where practicable, construction deliveries would be co-ordinated to avoid HGV movements during the traditional peak morning (08:00-09:00) and peak afternoon (17:00-18:00) hours. Some activities may be required outside of these times such as the delivery of AIL, concrete pours for foundations, night working for cable construction works in public highways and/or trenchless crossing activities.

11.1 Impacts on Road Network

East Pye themselves admit that the impact will have a negative effect. But their 'temporary impact' will be across the construction time of the scheme of at least **24 months**, on multiple local roads, especially as the A140 and B1527 will be used as main haulage access routes for the northern section of the scheme and the A140 for the whole of the scheme.

Construction Phase: Temporary increases in traffic volumes, particularly from HGVs and AILs transporting materials and equipment, will lead to congestion, increased wear and tear on local roads, and disruption to access for local residents and businesses. There will also be short-term detrimental road safety associated with construction traffic movements.

Operational Phase: As the panels and infrastructure have a limited life expectancy, they will require replacing during the 60 year lifespan of the scheme.

Panels will require changing 2-3 times, as will the batteries. Local residents therefore can expect further disruption, with predictions of 100 two-way HGV vehicles journeys across the scheme during replacement approximately every 15 years, across the scheme with increased haulage and AILs manoeuvring the quiet, narrow country lanes.

Decommissioning phase: similar to the construction phase, decommissioning activities will result in temporary increases in traffic volumes and associated disruption to local access and road safety for up to 24 months.

Table 11.13: Construction Vehicle Routeing - Solar PV Sites

Site Group	Accesses Used	Proposed Access Route
1A-D and BESS	A01, A02	**From A140/B1134 roundabout**: westbound on B1134, northbound on A01/A02. Depart on same route in reverse.
2A-C	A07, A08, A10	**From A140 (for vehicles from south)**: northbound on A140, access on A07/A08/A10 via existing laybys. Depart site: northbound on A140, execute u-turn on roundabout at Long Stratton Bypass / Parker's Lane, southbound on A140. **From A140 (for vehicles from north)**: southbound on A140 Norwich Road, execute u-turn on A140/B1134 roundabout, northbound on A140, access on A07/A08/A10 via existing laybys. Depart travelling northbound on A140.
3	A34	**From B1332**: westbound on B1527, southbound on Alburgh Road and Spring Lane, west onto A34.
4A	A19	**From Hempnall Roundabout**: south-west off exit of roundabout onto A19. Depart on same route in reverse.
4B	A20	**From Hempnall Roundabout**: eastbound on B1527, south onto A20. Depart on same route in reverse.
5A-B	A23, A24, A25, A26	**From Hempnall Roundabout**: eastbound on B1527, south onto A23/A24, for A25/A26 continue eastbound on B1527, southbound on The Street and west onto A25/A26. Depart on same route in reverse.
7A-F	A28, A29, A30, A40, A42	**From A140**: south on Hempnall Roundabout onto Site 4A via A19, *await call-forward to site*, eastbound on Hempnall Roundabout and B1527, northbound on The Krons, westbound on Fairstead Lane, north onto *A29/31*. Internal haul route to Sites 7A-F – cross Broaden Lane via A40 for access to 7E-F. For southern portion of 7D, southbound on Broaden Lane and west onto A42. Depart on same route in reverse.
7G-H	A44, A45, A57	**From B1332**: westbound on B1527, northbound on Shotesham Road and Woodton Road, west onto A57, internal haul route through 7K and 7J, exit on A45, southwest on Fylands Road, Bussey's Loke east/west on A44. Depart on same route in reverse.
7I-J	A45, A57	**From B1332**: westbound on B1527, northbound on Shotesham Road and Woodton Road, west onto A57, internal haul route through 7K and 7J, cross on A45 for access to 7I. Depart on same route in reverse.
7K-L	A57, A58	**From B1332**: westbound on B1527, northbound on Shotesham Road and Woodton Road, west onto A57/A58. Depart on same route in reverse.
8A-B	A52, A50, A49	**From B1332**: westbound on B1527, northbound on Shotesham Road and Woodton Road, westbound on Heath Road, southbound on Baxter's Lane, west on A52. For access to 8A, west on internal haul route through 8B, exit off A50 onto Market Lane, south onto A49. Depart on same route in reverse
9	A56	**From B1332**: westbound on Littlebeck Lane, north onto A56. Depart on same route in reverse.
10A-E	A61, A62, A65	**From B1332**: eastbound on Harvey Lane, south onto A61/A62, for A65 continue eastbound on Harvey Lane, northbound on Seething Road, west onto A65. Depart on same route in reverse.

Daily Vehicle Count for Site 7

Site 7A-C Daily vehicles

5 HGVs daily (at peak) arrive and 5 depart = 10 journeys

18 Other vehicles daily (at peak) arrive and 18 depart = 36 journeys *

*where will they park?

Site 7D-F Daily Vehicles

6 HGVs daily (at peak) arrive and 6 depart = 12 journeys

21 Other vehicles daily (at peak) arrive and 21 depart = 42 journeys*

*where will they park?

Site G-J Daily vehicles

3 HGV's daily (at peak) arrive and 3 depart = 12 journeys

11 Other vehicles daily (at peak) arrive and 11 depart = 22 journeys*

*where will the park?

Site 7K-L Daily Vehicles

3 HGVs daily (at peak) arrive and 3 depart = 6 journeys

9 Other vehicles (at peak) arrive and 9 depart = 18 journeys*

*where will they park?

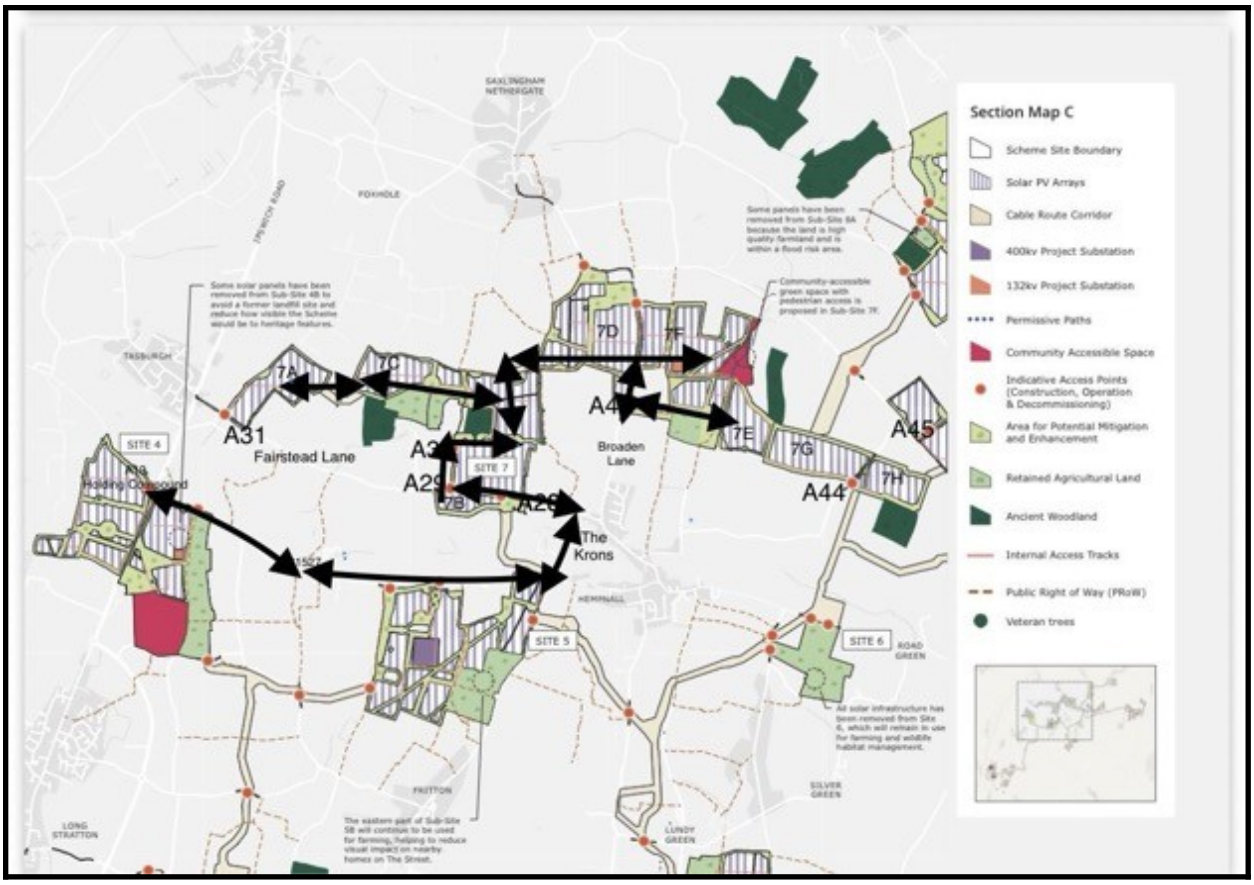
Total HGVs is 17 arrive and 17 depart = 34 journeys

Total Other vehicles is 59 arrive and 59 depart = 118 journeys

Site 7A-F Route - using Hempnall Footpath 2

- using Access points A28, A29, A30, A40, A42
- From A140: south on Hempnall roundabout onto Site 4A via A19;
- Await call-foreward to site;
- Eastbound on Hempnall Roundabout to B1527;
- Northbound on The Krons;
- Westbound on on Fairstead Lane;
- North onto A29/A31;
- Internal haul route to Sites 7A-F;
- Cross Broaden Lane via A40 for access to 7E-F;
- FOr southern portion of Site 7D, southbound on Broaden Lane and west onto A42;

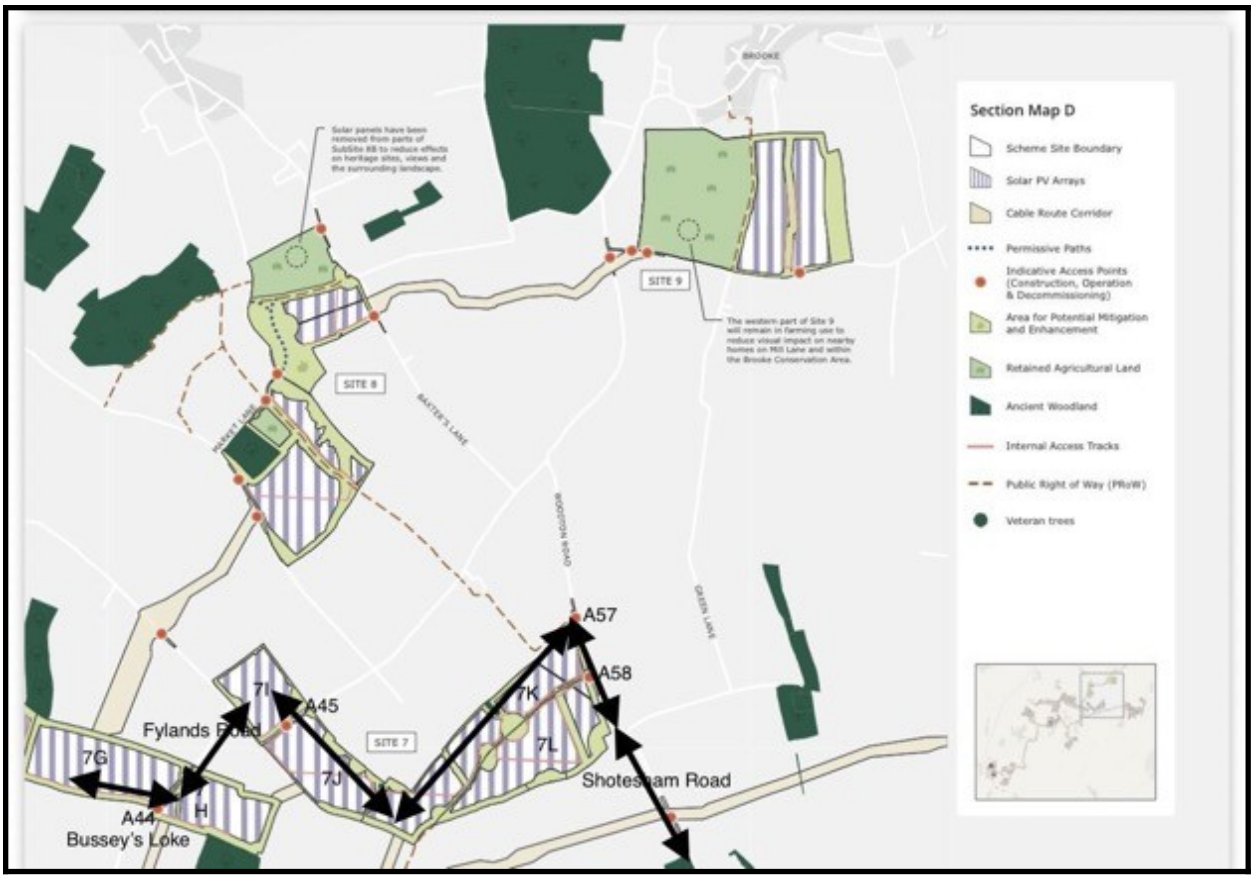
- Depart on same route in reverse.



Map shows route for access to Sites7A-F using internal haul road and in reverse

Site 7G-H

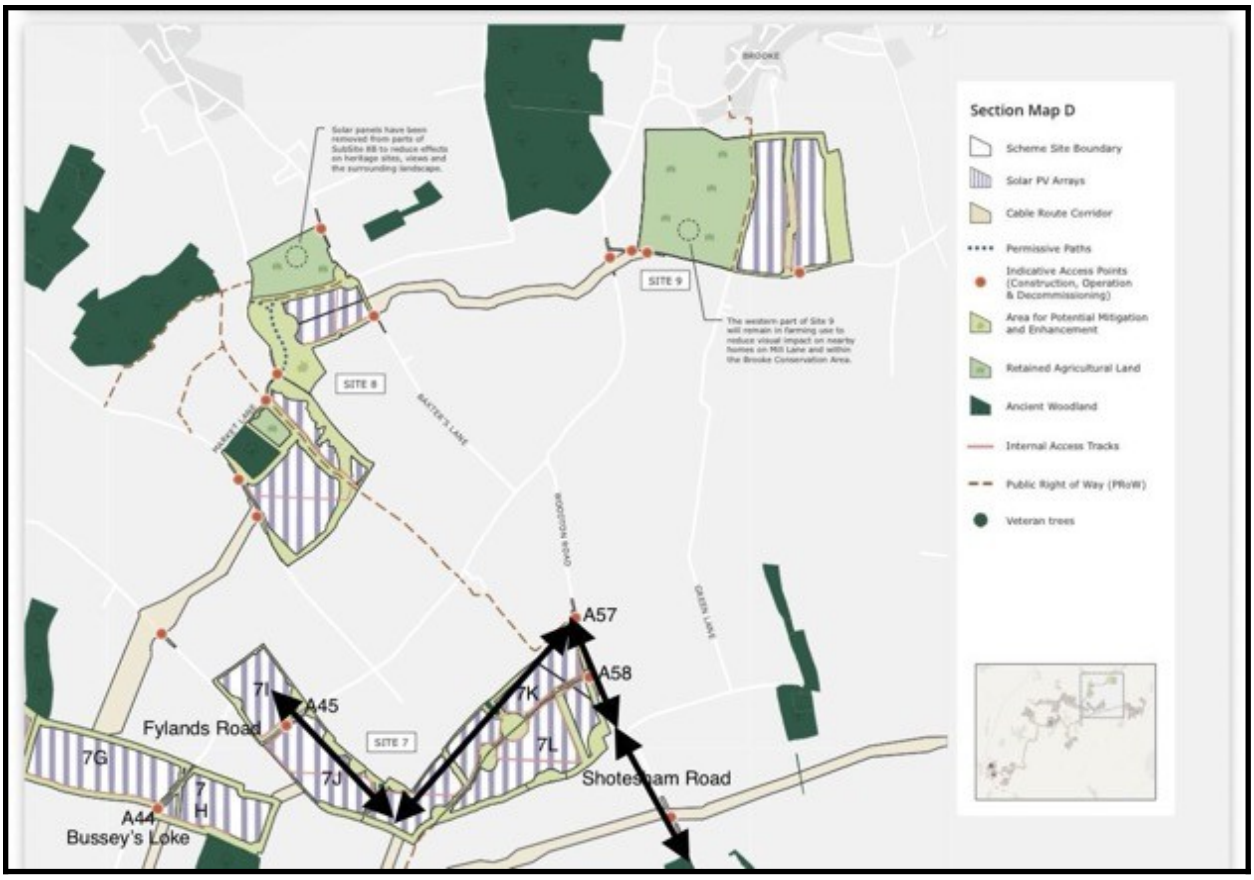
- Using Access points A45, A57;
- From B1332, westbound on B1527;
- Northbound on Shotesham Road and Woodton Road;
- West onto A57;
- Internal haul route through 7K and 7J;
- Exit on A45;
- Southwest on Fylands Road, Busseys Loke;
- east/west on A44;
- Depart on the same route in reverse.



Map shows route to for access to Sites 7G-H using internal haul road and in reverse

Site 7I-J

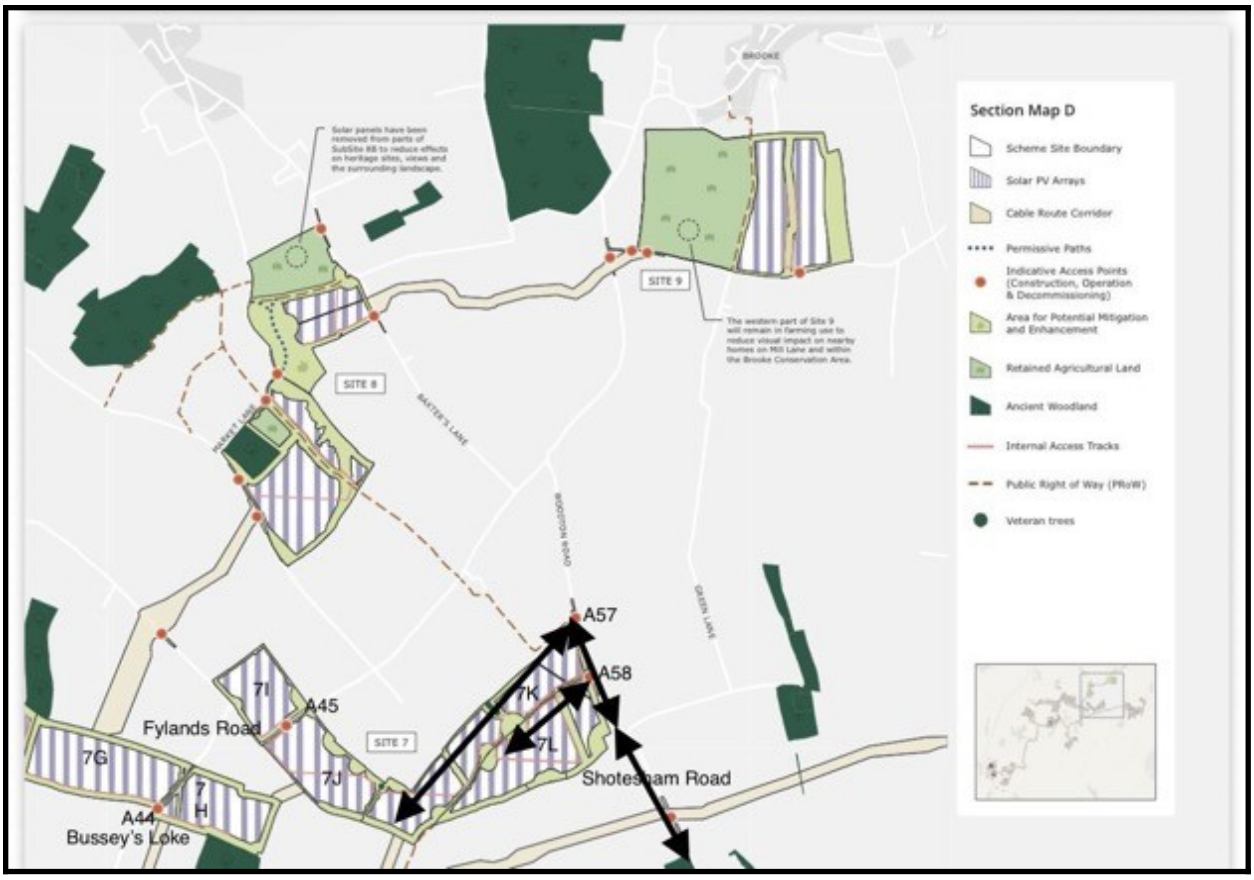
- Using Access points A45, A57;
- From B1332, westbound on B1527;
- Northbound on Shotesham Road and Woodton Road;
- West onto A57;
- Internal haul route through 7K and 7J;
- Cross on A45 for access to 7I;
- Depart on same route in reverse.



Map shows route to for access to Sites 7I-J using internal haul road and in reverse

Site 7K-L

- Access points A57, A58;
- From B1332, westbound on B1527;
- Northbound on Shotesham Road and Woodton Road;
- West onto A57/A58;
- Depart on same route in reverse.



Map shows route to for access to Sites 7K-L using internal haul road and in reverse

The Krons



The Krons with heavy vegetation either side of the lane and overhanging trees



The Krons bridge



The Krons bridge over the Hempnall Beck

The Krons is noted as having passing places and no posted weighted restrictions. There are two old bridges at this location over streams that were not built to withstand multiple HGV movements each day - this requires further investigation.

APP-094 Environmental Statement Volume 2 - Indicative Transport & Access Study Area: Figure 11.1 shows other minor roads that are within the study area including:

- Mill Lane/Norwich Road - **this is closed until further notice and may be permanently**
- Cargate Lane - which is in Saxlingham Nethergate (not Hempnall Green as stated in document) and is not suitable for two way large vehicle movements, and in some places not wide enough for two cars to pass
- The Street/Church Hill, Saxlingham Nethergate - on street parking, a primary school and pinch points make this unsuitable for HGV vehicle movements where two way traffic is not possible (also very old water and sewerage pipes under carriageway)
- The Green/Bussey's Loke - narrow single track with no passing places, also route of Boudicca Way (long distance footpath) resulting in high pedestrian use

AIL Route for transformers to substation on site 7F

It is clear that the AIL route has been planned from behind a desk and the consultants have not set foot within the village - "swept path assessment has been constructed from client supplied data and OS Mastermap Data"

Appendix D AIL report (APP-176) gives lots of measurements and complex diagrams but uses vague phrases such as "street furniture positions are approximate" and referring to the route as "considered to be negotiable" **This does not provide sufficient accuracy.**

On page 14 of the report regarding sites 7D,7E & F in the table under "Any known problems for AIL access in terms of negotiability and other route comments" it states "Oversail along the route to site is anticipated to remain within the public highway boundary" **This suggests that there is no need for remedial works, this conflicts with their assessment late in the report**

In attachment 6 (swept path assessment):

On diagram (24-1221.SPA08) along The Street passing the War Memorial it refers to "caution advised" regarding street furniture and overhead wires but "expected oversail" is "expected to be within Highway boundary"

Leader 4 - suggests remedials to foliage depending on time of year - This point is located at the narrowest part of Church Hill where on the north side is a grade 2* retaining garden wall with a wrought iron fence atop (The Old Rectory). This wall holds up circa 3ft height of soil into which a yew hedge is planted - no amount of *trimming of foliage* is going to widen the route without

demolishing the wall/fence. On the south side is The Granary (dwelling) which is situated right up to the pavement. This has not been recognised in the report.

All the way along this part of the route through Saxlingham Village and around to Broaden Lane it is suggested that "subject to the implementation of the recommended remedial works, and observing the stated cautions, this section is considered to be physically negotiable"

The remedial works thus far include trimming/pruning to hedges/trees, and the removal of bollards on the section from The Green around to Broaden Lane.

The dimensions that are being given in this report leave very little room, in some parts of the route only centimetres, for any error (whether human or mechanical) which may result in permanent damage to property and infrastructure. Consultants need to visit the village and do an in depth analysis of the AIL route, including proper site surveys.

The weight of these AIL vehicles, although spread over several axles, are likely to damage services which run under the road in the village including water and sewerage pipes (some of which are asbestos and fragile). Many of the houses along the route through the village are historic grade 2 listed and some have limited foundations which may be damaged by heavy loads. The war memorial is also listed and in danger of damage

In the last 24 hours (30/5/26) East Pye planning maps have appeared around the village that are different to those presented in previous consultations, with areas of land shaded that are of interest to the development **-** these are bullying tactics that are unsettling to residents, and contravenes public consultation requirements.

AIL Route for Cable Drums to cable route CRC10

The definitive route for the AIL cable drums is not clear. The Construction Traffic Management Plan (CTMP)(APP-201) is only an outline document - "final AIL routing will be confirmed at the detailed design stage".

Figure 8 in the CTMP & Figure 11.8 (APP-095 Likely & suitable routes to the scheme) shows the AIL cable drum route using The Green (Saxlingham) to access CRC10

BUT.....

APP-176 ES Volume 3 Appendix 11.1 Transport Assessment Part3

Attachment 11 - Cable Drum Highway Access Location Summary

This document shows that access along Saxlingham Green is non-negotiable (coloured red in table) stating "Narrow road widths along The Green restrict access" for access point 3.1

Moving the access point to 3.2 on The Green (coloured amber in table) would require "High amount of remedial works"

The Green is a conservation area with a very narrow carriageway (3 metres wide in places), which is also the route of Boudicca way (long distance footpath) resulting in high pedestrian use.

AND THEN...

Alternatively the CTMP (APP-201) in section 6.2 suggests delivery of cable drums will be to one of three CRC temporary construction compounds and then onwards using internal routes.

As a result of these inconsistencies it is not clear which route is being proposed. This requires urgent review.

Haul Roads

The scheme proposes numerous, extensive haul roads to facilitate the construction and on-going management and maintenance of the project. The heavy clay topsoil means that these roads will have to be constructed with a firm foundation to prevent the surfaces sinking into the clay in wet winter weather. The material excavated for the foundations is to be stored alongside the tracks. The combination of the material excavated for the foundations, the foundation material that will have to be imported, and the passage of the 60-year life of the consent casts severe doubt of the ability of the land to be restored to good agricultural use following the expiry of the DCO.

The construction phase of these haul roads will inevitably be both extremely noisy, dusty and disruptive for the nearby inhabitants. There will be increase in traffic in the surrounding area of very narrow country lanes. Following construction, the use of the tracks by maintenance vehicles will generate some noise, dust and disturbance that will impact on nearby houses and users of the PROW's affected by the scheme.

The impermeable nature of the road surface will cause significant run-off onto the already flood prone surrounding land.

11.2 Proposed Road Straightening and Widening

The project will require significant highway works to facilitate access for construction vehicles and the installation of underground cabling.
The project necessitates widening existing roads, removing vegetation, (many veteran and ancient oaks and hedgerows live at the roadside along the route) and removing street furniture to allow for Abnormal Indivisible Loads (AILs) for transformers and cable drums.

Fairstead Lane is proposed for widening which will mean removing significant hedgerows and trees as a result





11.3 Impacts on Existing Traffic

Key Effects on Hempnall Roundabout

East Pye Solar
ES: Appendix 11.1 – Transport Assessment
APP/6.3.11.1

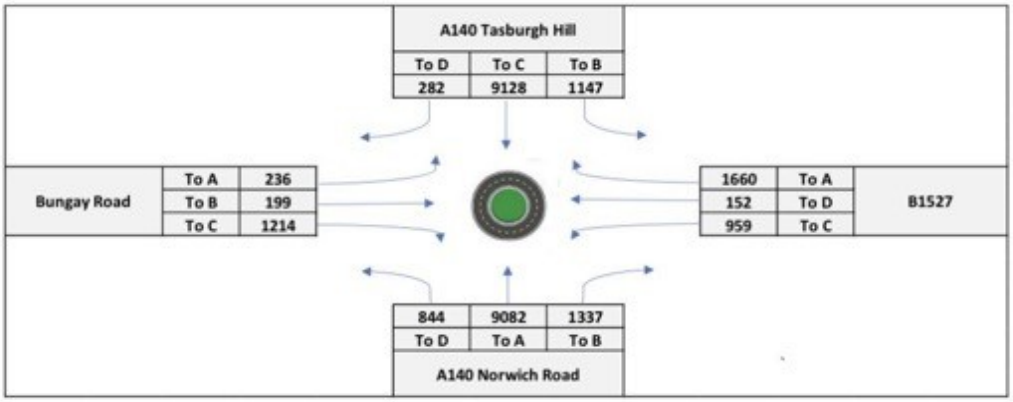


Figure 2.1: MCC Baseline Flows - Hempnall Roundabout (24hr, all vehicles)

Looking at the image above, the total average number of vehicles to use Hempnall Roundabout in a 24hr period is 26,240 however it isn't clear if this count is before or after the opening of the Long Stratton by-pass.

Traffic flow has increased since the opening as sat-navs will guide traffic through the route instead of avoiding it due to closures or congestion.

However flow on the B1527 could be skewed as local traffic from east of Long Stratton had to use the B1527 during the by-pass construction as access lanes were closed for 18 months

- **Creation of 5th exit:** the busy 4 exit will increase to 5 to access site 4A access point A19;
- The **construction compound** and holding area for haulage to site 7A-F will be located now on site 4A adding to construction traffic for other sites. **This does not form part of the targeted consultation;**
- **Abnormal Indivisible Loads (AILs):** the Hempnall roundabout will be a primary navigation point for extremely large vehicles carrying transformers and cable drums, with some loads expected to reach **4.9m wide and 26.5m long**;

- **Infrastructure Modifications:** To accommodate these AILs, HGVs and construction traffic, the project proposes **widening existing roads** and potentially removing street furniture and vegetation around the roundabout area to increase line of sight;
- **Traffic Congestion:** congestion will increase due to the amount of haulage vehicles and additional access on the roundabout which will increase travel times and air pollution. It has a potential to negatively affect road safety;
- Consideration has not been given to the **increase in housing as part of the Long Stratton Neighbourhood Plan** with increase in road users;
- **No road surveys have been conducted since the Long Stratton by-pass opened** and due to construction traffic and normal congestion through Long Stratton, sat nav routes would direct traffic away from this busy route;
- **The sites that will be routed through the Hempnall roundabout are**:
    - 1A-D, 2A-C, 4A-B, 5A-B, 7A-F
    - BESS Site - adjacent to sub-site 1A-B
    - CRC Compound 1 (east of A140, opposite Sub-site 2C)
    - CRC Compound 2 (north of Mill Road)



Access A19 to site 4A

Effects on B1527 Bungay Road to Hempnall

The B1527 connects to the A140 at the Hempnall roundabout. It is a two-way road that undulates and bends.

It serves as the main connecting route to and from Hempnall and on to Bungay. It acts as a link to hamlets and villages in the area that need to reach the A140 to Norwich or southbound, as well as the local facilities at Long Stratton.

It is a 50mph road reducing to 40 and 30mph with multiple businesses along the stretch including Jack in the Box nursery. Small single track lanes and PRoW can be found off the road as well as field tracks and agriculture vehicles use the lane to move between fields.

- B1527 Bungay Road includes access point A20 to Site 4B just east of the Hempnall roundabout;
- All construction traffic for A20 will require travelling east from Hempnall roundabout and crossing the carriageway into A20;
- Brick Kiln Lane is located 100m from A20 and is a small but busy lane used by local businesses and residents as an access route to Morningthorpe;
- Brick Kiln Lane also serves the school bus;
- No traffic assessment has been done at the entrance to Brick Kiln Lane which is also on a bend surrounded by woodland either side;
- Access point A23 and A24 to site 5A and B a few hundred metres further along B1527 also will require construction traffic and AIL to cross the carriageway;
- Further access to site 5 at access points A25 and A26 require again crossing the carriageway at The Street;
- As site 4A is a holding compound for sites 7A-F, all construction traffic for a further six sites will also manoeuvre along B1527 making it a total of 10 sites/sub-sites using this busy and crucial access road with exit journeys also in reverse;
- **The B1527 was not part of the targeted consultation for access to sites 7A-F**

HGV and Vehicle Movements:

East Pye Solar state the **daily** movements are:

- 69 HGVs will arrive and depart across the scheme = 138 in total
- 205 daily cars/shuttles/LGVs will arrive and depart across the scheme = 410 in total
- **Hempnall Roundabout will be impacted by:**
    - 4 HGVs (4A)
    - 6 HGVs (4B)
    - 10 HGVs (5A and 5B)
    - 5 HGVs (7A-C)
    - 6 HGVs (7D-F)
    - **Total extra HGVs is 31 = return journeys**
    - 16 other vehicles (4A)
    - 22 other vehicles (4B)
    - 32 other vehicles (5A and 5B)
    - 18 other vehicles (7A-C)
    - 21 other vehicles (7D-F)

    - **Total other vehicles is 109 other vehicle two-way journeys = 218 more vehicles on Hempnall roundabout.**
- In fact the impact will be greater as the HGVs will be using the compound at 4A as a holding area. Therefore, the HGVs for Site 7A-F will impact the roundabout 3 times as they arrive, called forward and exit again.
- **The impact to the roundabout for sites 7A-F will be total of 33 HGV journeys and 78 Other vehicles, daily**

Inconsistent information

Some examples of inconsistencies in documentation submitted:

There is no mention of a temporary construction compound within land parcel 7 on the planning Inspectorate website: https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN0110014-000127-6.2.4.2 Environmental Statement Volume 2 Figure 4.2 Indicative Temporary Construction Compound Locations.pdf. AP060

However, there is a map on the East Pye solar website that clearly shows a temporary construction compound within land parcel 7D. The information is contradictory and unclear

https://rust-sheep-3t6z.squarespace.com/s/Figure-52-Indicative-Location-of-Construction-Compounds.pdf

These two pieces of information appear inconsistent and clarification is required regarding the intended construction use of Parcel 7D and whether any temporary compound, laydown area, welfare facility, storage area or other construction logistics activity is proposed there.

There is Inconsistency in terminology in different chapters between ‘Project Substation’ and ‘Substation’. 7F is referred to as a Project Substation in ‘Agricultural Land’ (chapter 15) and ‘Noise and Vibration’ (chapter 12) and in other chapters as ‘Substation’ coA map in the document Design Approach APP/7.17 shows Saxlingham Nethergate and The Green as NOT in Conservation Areas.

Other examples:

- The Street (Hempnall) / Broaden Lane / Church Hill / The Street (Saxlingham Nethergate) Single carriageway 60mph Hempnall Primary School and Saxlingham Primary School located along route. On-street parking along

Hempnall section. Overhanging building in Hempnall with speed restriction. This statement is incorrect. The street Saxlingham is 30mph

- 18 - The Green Medium Sensitivity Contains some residential dwellings, largely set back from the carriageway, with Saxlingham Hall nursing home located nearby on a side road. This statement under estimates the impact on houses on the green
- 7A-F A28, A29, A30, A40, A42 From A140: south on Hempnall Roundabout onto Site 4A via A19, await call-forward to site, eastbound on Hempnall Roundabout and B1527, northbound on The Krons, westbound on Fairstead Lane, north onto A29/31. Internal haul route to Sites 7A-F – cross Broaden Lane via A40 for access to 7E-F. For southern portion of 7D, southbound on Broaden Lane and west onto A42. Depart on same route in reverse. The new Haul route although in other parts of the submission they are still using the road through the village and The Green. Clarity is required
- 11.6.25 Construction vehicle routes have been selected with the principal aim for avoiding routeing vehicles through local villages wherever possible including the villages of Great Moulton, Long Stratton, Hempnall, Saxlingham Nethergate and Brooke. The selected routes are considered the most appropriate to each access and have been prepared based on engagement with NCC. And yet in the outline traffic management plan it clearly shows heavy goods going through Saxlingham Nethergate and The Green

- Design approach APP/7.17 – does not show conservation area for Saxlingham Nethergate and Saxlingham Green
- Figure 3.17 – Shotesham/Woodton hornbeam woods label appears twice – one of which points to Saxlingham Grove
- Figure 4.9 shows substation in 7F and not mentioned anywhere in the document
- Figure 4.9 and 5.4 contradict each other for 7D land – which one is correct?

11.4 Cable Route Corridor

- CRC5 - links Sub-site 7H with Sub-site 7J and crosses a single field;
- CRC7 - links Site 5 with Site 7. CRC7 comprises a number of fields, woodland and a Statutory Main River, River Tas chalk stream;
- CRC8 - links CRC6, Site 6 and parts of Site 7 together, CRC8 comprises numerous fields and accommodates some highway infrastructure;

- CRC10, CRC11 and CRC12 - links various parts of Site 7 together and connects the Scheme to Site 8. CRC10, 11 and 12 comprises a number of fields. CRC 10 accommodates some highway infrastructure.

There are some key concerns for CRC7 when crossing the Hempnall Beck, a Statutory Main River.

Main Concerns:

- **Flood risk:** a cable crossing beneath a Main River can potentially affect the river's flow and floodplain. The Environment Agency specifically raised concern that the cable crossings under Main Rivers could increase flood risk if not properly designed.
- **Construction method:** The applicant proposes a trenchless crossing (HDD - horizontal directional drilling) at Hempnall Beck rather than digging an open trench through the river. CRC7B is identified as an avoidance area for the Fritton Grange Meadows COuntry Wildlife Site and HEmpnallHempnall Beck Main River;
- **Fish and aquatic ecology:** This was a particularly important concern raised during the EIA scoping process. The concerns included:
    - HDD noise potentially affecting fish behaviour;
    - fine sediment and pollution runoff entering Hempnall Beck during construction;
    - potential effects on fish and white clawed crayfish
    - the need to demonstrate that the cabling will be sufficiently deep enough so that electro magnetic fields are not detectable at levels that could affect aquatic life;
- **Aquatic invertebrates**: the scoping comments also highlighted the need to consider aquatic invertebrates and protected species including the Norfolk hawker and white clawed crayfish that are present within the river Tas;
- **Wildlife site**: CRC7B crosses/comes within Fritton Grange Meadows Country Wildlife Site, so the river crossing isn't simply a water-engineering issue; there is also a designated local biodiversity receptor to protect;
- **Watercourse crossing details**: The Environment Agency asked for sufficient detail on the location and methodology of cable crossing, because both construction and the finished crossing could have implications for flood risk, aquatic habitat, habitat connectivity and the river's flow regime.

11.5 Impacts on Public Rights of Way

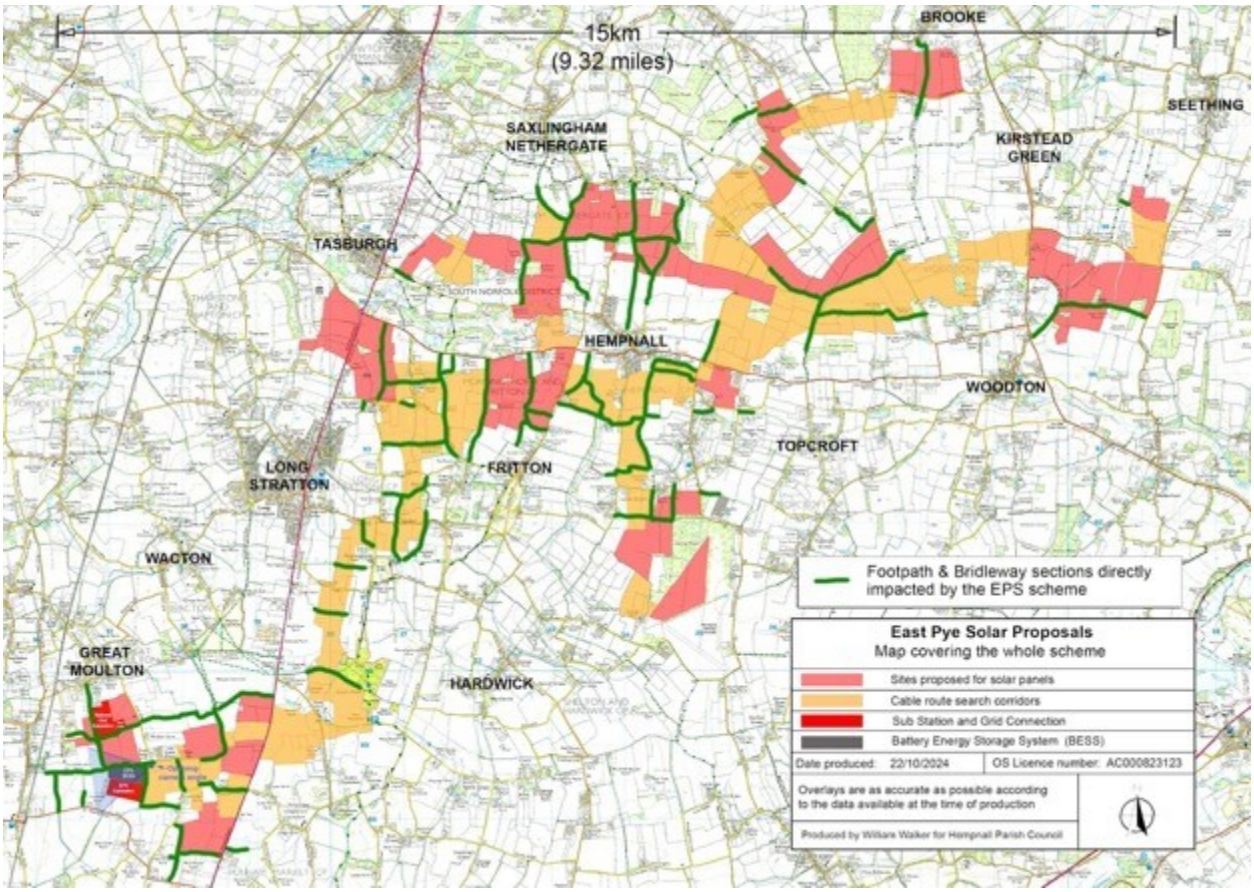


Image shows the impact to all PRoW across the Scheme



Part of Saxlingham Green Solar Site - (Shaded in Red) **Many footpaths directly affected**

The whole area is criss-crossed with numerous public footpaths and bridleways, including the historically important and much-visited Boudica Way. During the construction phase many of these paths will be inaccessible due to obstruction by vehicles and equipment and for safety reasons. After completion, none of the paths will hold any attraction for walkers and horse riders as the views will be dominated by the solar panels, in some cases on both sides of the path.

There is a permanent 'footpath' map by the War Memorial.

Paths are used recreationally by locals for walking, running, dog walking and horse riding and by visitors attracted to this quiet and unspoilt area. Importantly, many paths are also used as a practical and safe way of moving from one community to another on foot.

The Land parcels 7D (solar arrays) and 7F (solar arrays and an electricity sub-station) are separated by a road but are otherwise bordered on three sides by 3 kms of public footpaths, the southern edge being Processional Way **(SN-FP27)**, so named because it marks the border with Hempnall and was walked during the annual beating of the bounds. Much more historically, the eastern border, **Botenha Way (SN-FP 9)** retains the name of Saxon heiress Bote from the mid 11th century.

This is an ancient and historic landscape.

All use of the paths surrounding 7D and 7F would be adversely affected in the short (and in some cases, long) term by views of large scale industrial infrastructure, extensive fencing, construction noise and traffic. And the intention to close and restrict access of the majority of them will also have a significant adverse effect, far beyond mere inconvenience, on the ability to travel safely on foot from the Saxlinghams to Hempnall where there is a shop, post office and vehicle repair garages.

From Saxlingham Nethergate the current route follows PRoWs SN-FP14, SN-FP12, Hp-BR30 to Fairstead Lane in Hempnall:

SN-FP14 forms the northern border of 7D and is a lovely tree and hedgerow lined linear woodland walk which starts close to the ruined church of St Mary then passes through a drainage hollow known as Mud Hole once home to four cottages, now all gone. Steep steps lead up and out to bright open field views (7D) to the east. A left turn at the junction with **SN-FP12**, which forms the southern border of 7D is followed by a right turn down **HpBR-30 (Pymar's Lane)**, another beautiful dappled linear woodland walk leading to Fairstead Lane Farm and Fairstead Lane.

During the construction phase, and the renewal and decommissioning stages, however, this walk would no longer be feasible. **SN-FP12, SN-FP13** (which links the top of Church Hill to SN-FP14) and **SN-FP14** are all listed as 'Medium-term' closures, defined as 'a month, or longer, up to the commencement of the Scheme operation' which will have the effect of closing down this access route for the duration of the longest of the closures.

Recognising this, diversions have been suggested: 'Either **SN- FP10** and **Hp-FP3** or **SN-FP9** and **Hp-FP5** via Wood Lane, to get between Saxlingham Green and Saxlingham Nethergate in the north and the Street and Fairstead Lane in the South'.

Aside from failing to recognise the off-road distance between the centre of Saxlingham Nethergate and a mid-point along The Green, these paths, which form the routes by which residents of The Green currently reach facilities in Hempnall, have own restrictions;

SN-FP10 leads directly off national footpath Boudica Way, and cuts southwards down 7F where it meets to form a corner with the east-west southern border path **SN-FP27,** alongside which a 0.75 hectare, 7m high substation is planned. Both paths have largely open views across 7F around a peninsular of woodland to the north, where Saxlingham Green, a conservation area with many listed buildings forms the northern border. Continuing south is **Hp-FP3** which runs along the western edge of 7E for some distance, before arriving at Bussey's Loke in Hempnall, thus forming a safe way to get from Saxlingham Green to Hempnall on foot, Broaden Lane being national speed limit with no pavement.

The alternative route suggested starts at **SN-FP 9 (Botenha Way),** which also leads directly off Boudica Way and follows the eastern border of 7F with largely open field and peninsular woodland views into 7F. There is a short stretch of **SN-FP27** with further open views north towards Saxlingham Green before the route turns southwards again, onto **Hp-FP5,** which forms the western border of 7E, leading ultimately to Bussey's Loke, in Hempnall.

SN-FP27 is listed to be closed, Medium-term, as is **SN-FP11** that takes the footpath to an entrance on Broaden Lane. Given the siting of the sub-station a lengthy closure seems likely. **SN-FP10** and **SN-FP 9, Hp-FP3** and **Hp-FP5** will all be 'open' but managed, meaning there will be signage, moving vehicles, widened access tracks where applicable, banksmen or marshals and 5–10 mph speed limits while construction with all the noise and visual disturbance associated with it continues around them. None of which adds up to an enjoyable walk in the countryside and would undoubtedly deter recreational walkers, in direct conflict with Norfolk County Council's public access and heritage objectives.

Planned mitigation for the open views that form part of the paths around 7D is limited to the planting of 'native hedgerow and native hedgerow trees' along exposed and open borders. For **SN-FP13,** where an open stretch would give full view of solar arrays and vehicle movement, this is extended to 'hedgerow with trees, instant hedgerow, and native broadleaf woodland'.

Mitigations for the visual effect of the Scheme on 7F (and 7E) from surrounding, and more southerly footpaths include different combinations of hedgerow and hedgerow trees, native shrub planted with individual trees, native broadleaf woodland planting.

These measures seem optimistic in relation to the height and scale of the solar panel and substation elements of the scheme especially since many of the visualisations and photomontages have been made from photographs taken at long ranges (not applicable to footpaths that run right alongside solar arrays) and in the summer; a different picture will emerge in winter months in a predominantly deciduous landscape.

Until this vegetation is of a height to obscure arrays of 4.5m static or tilting solar panels, plus, on 7F, a 7m sub-station, there will be significant adverse long term visual effects arising from using these paths, particularly looking northwards towards 7F where it is accepted that 'At year 15 the proposed mitigation would be fully established and would screen the majority of the proposed

elements. It is however likely that the substation would remain visible to some degree' (Public Rights of Way Visual Amenity Assessment SN-FP27)

And whilst other mitigating planting including 'Flower Rich Pollinator Mix along the adjacent field margins, and areas of retained scrub and grassland' is a pleasant idea it falls extremely short of mitigating the loss of open green space.

In addition, little or no regard has been taken of the impact of widespread use of 2.5m high deer fencing which, as well as further industrialising the landscape, would potentially close in footpaths with fences either side making them unpleasant and potentially dangerous spaces for women and girls and lone walkers.

In conclusion, the construction phase of this scheme would cause untold disruption to the footpath network in this place, severely reducing the ability of both residents and visitors to move about on foot recreationally or between communities. And in the long term from almost all points around these fields the open views and the experience of using these peaceful and ancient footpaths, walked since the earliest days of human settlement in Saxlingham Nethergate, would be permanently degraded by this proposed industrialisation.

Land parcels 7D and 7F are separated by a road but are otherwise bordered on three sides by 3 kms of public footpaths, the southern edge being Processional Way, so named because it marks the border with Hempnall and was walked during the annual beating of the bounds. Much more historically, the eastern border (Botenha Way), is named after a Saxon heiress (Bote) from the mid 11th century.

South of Processional Way, in the parish of Hempnall, are further fields earmarked for solar panels which means this historic footpath will be fenced in on both sides, making any walk along it both unpleasant and dangerous. The same will apply to the 600 m path which runs north to south through 7F, joining Processional Way and leading to Hempnall.

The western border of 7D forms part of a well-used woodland path to Hempnall, the start point of which coincides with a vehicle access point on a blind bend. Two other access points, on Broaden Lane, also coincide with pathway start points.

From almost all points along the 3.6 kms the open views and the experience of using these ancient footpaths, walked since the earliest days of human settlement in Saxlingham Nethergate, would be permanently degraded by the proposed industrialisation which is contrary to policy protections for public rights of way and historic landscape corridors.

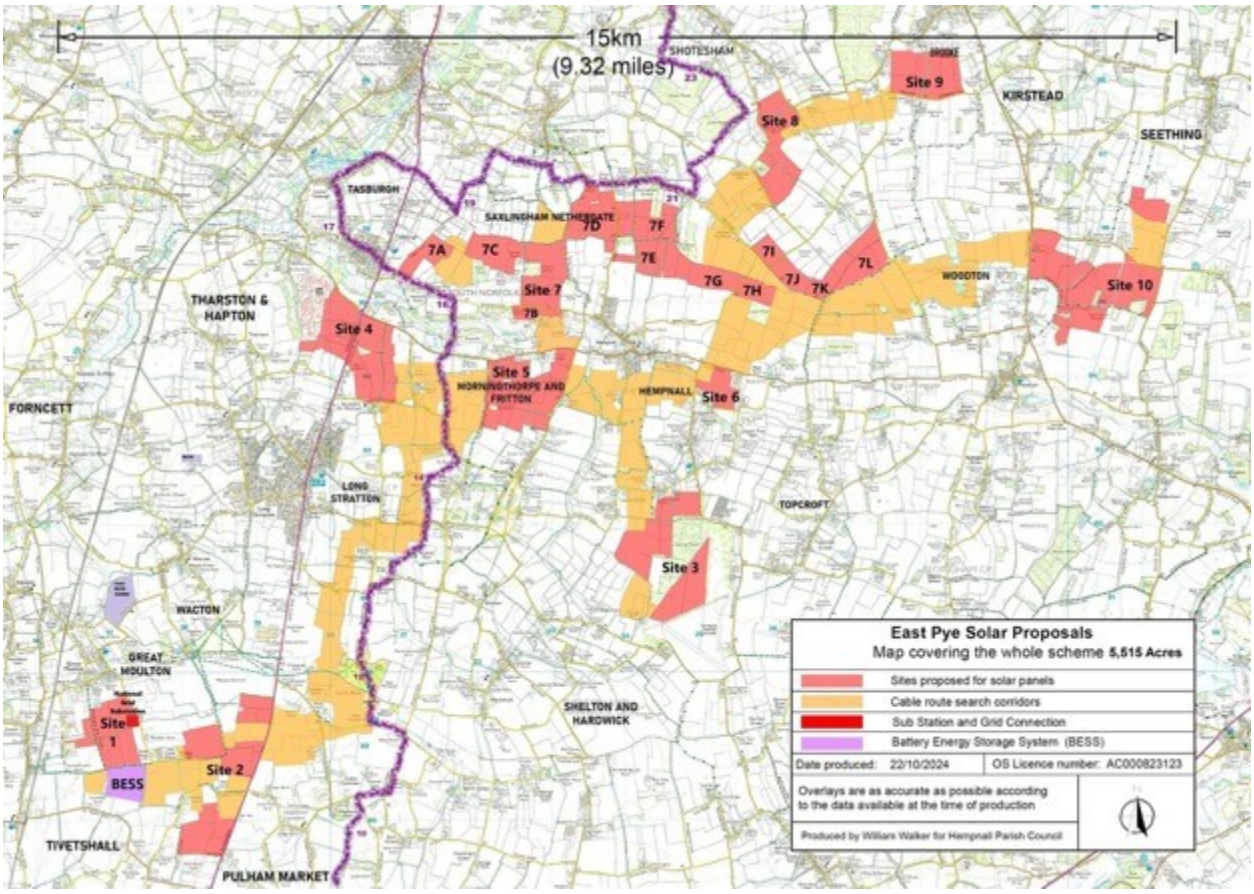
In addition, **Boudicca Way**, South Norfolk's only and much used long-distance footpath runs along the length of the conservation area of Saxlingham Green, linking with Botenha Way at the eastern edge. Further on it continues through the conservation area of Church Hill, proposed as an AIL route.

In summary this industrial development would:

- destroy its historic and experiential value;

- conflict directly with public access and heritage objectives.
- Create perceived unsafe confined spaces for women and girls, making them less likely to continue to use PRoW

This represents **qualitative severance**, not mere inconvenience



Boudicca Way map goes directly past the southern border or subsite 7A and along Fairstead Lane

11.6 Impacts on Pedestrians and Children

The high security fencing will restrict the width of the paths and eliminate any means of escape, making them less safe e.g. for children and passing dog walkers. During the construction phase the numerous HGVs and the Abnormal Indivisible Load (AIL) vehicles will make the minor (unclassified) roads very unsafe for pedestrians in Saxlingham Nethergate village, Hempnall VIllage and Fairstead Lane (Boudicca Way) as well as

children and parents outside the primary schools in both villages, and on The Green e.g. for walkers following Boudica Way.

11.7 Impacts on Cyclists

During the construction phase, all access roads in the area would effectively become no-go areas for cyclists, both recreational and commuting, due to the narrow width of the unclassified roads and the size and frequency of the supply vehicles.


13:15
78
Rebellion Way: map and GPX file
Cromer
Fakenham
Reepham
Dereham
Norwich
Watton
Wymondham
Attleborough
Brandon
Lakenheath
Harleston
Bungay
Mildenhall
Eye
Bury St Edmunds
Saxmund
100m
cyclinguk.org

Rebellion Way is a 256 mile circular cycle route that utilises the lanes around site 7 including some of the paths for Boudicca Way where allowed.

11.8 Parking for East Pye Solar Workers

According to East Pye Solar, an average of 258 workers will be on site daily with a maximum of up to 479 per day.

Although it has been suggested that bussing in workers wherever possible will be looked at, moving them across the scheme will impact local road networks and buses and minivans will still need to be parked.

11.9 Local Bus Transport

2.4 Public Transport

Bus

2.4.1 The key bus corridors within the vicinity of the Sites and CRC are summarised in **Table 2.2**. Bus stops located within the Study Area are shown in **ES: Figure 11.9 – 11.13 Public Rights of Way, National Cycle Network and Bus Stops [EN0110014/APP/6.2.11.9-11.13]**.

Table 2.2: Bus Services

Service Number	Route	Nearest Sites	Frequency, Mon-Sat (approx.)	Operating Hours, Mon-Sat (approx.)
82	Norwich - Roydon	2A-C, 7A	Every hour (Mon-Sat)	09:00-22:00 (Mon-Sat)
84	Norwich – Hempnall – Long Stratton / Wacton / Harleston	6, 7D-F	Every 2 hours (Mon-Sat)	08:00-18:00 (Mon-Sat)
41 / 41A / X41 / 941	Norwich – Brooke – Woodton – Ditchingham – Bungay / Halesworth	10C	Every 30 mins (Mon-Sat)	08:00-23:00 (Mon-Sat)
1 / 1A	Norwich – Long Stratton / Burston / Tivetshall - Diss	1A-D, 7A	Every 3-4 hours (Mon-Sat)	08:00-16:00 (Mon-Sat)
36 / 36A / 36B	Horsford – Norwich – Long Stratton / Harleston	7A, CRC4	Every 30 mins (Mon-Sat)	06:00-23:00 (Mon-Sat)

The main bus routes utilising A140 as well as any of the stipulated transport routes including the 36, 36A and 36B will undoubtedly experience delay and disruption to the service.

Saxlingham Nethergate - 7D and 7F

The regular bus service no.84 from Harleston via Hempnall to Norwich, through Saxlingham Nethergate, would at best suffer delays throughout the construction phase, due to congestion as a result of the increased HGV traffic, and may need to be re-routed or cancelled.

For many, the bus is the only means of getting about. People of all ages rely on the to get to their place of work, to school or college in Norwich as there are no 6th form high schools locally, university or to use the resources of Norwich for leisure and shopping.

Often school and college students will leave their home at 7am to get to their destination on time. The delay to services in the morning and evenings will elongate their day considerably.

11.10 Impact to local Businesses

The Hempnall roundabout serves c20,000 vehicles in all directions including commercial, HGVs, service industry and emergency services; police, fire and ambulance. Adding an access point on this roundabout not only will cause traffic congestion that will cause delay to local and other businesses as they pass through this significant junction.

Congestion will also cause vital delay to emergency response times.

Farm traffic will be impacted on the local road network as they try to manoeuvre the increase in HGVs and AILs. B1527 is only just wide enough for two commercial vehicles to pass and the road undulates and winds along making the road more dangerous with the extra construction traffic.

The Krons, Fairstead Lane, Hempnall, to and from Bungay, Hempnall to Saxlingham Nethergate are all main local routes for courier, delivery, food, local agriculture, small and local business including services like trades, to name a few.

These routes and many others will be far busier and delay to local transport will have a detrimental effect as people try to still do their job.

11.11 Impact on local Airfields

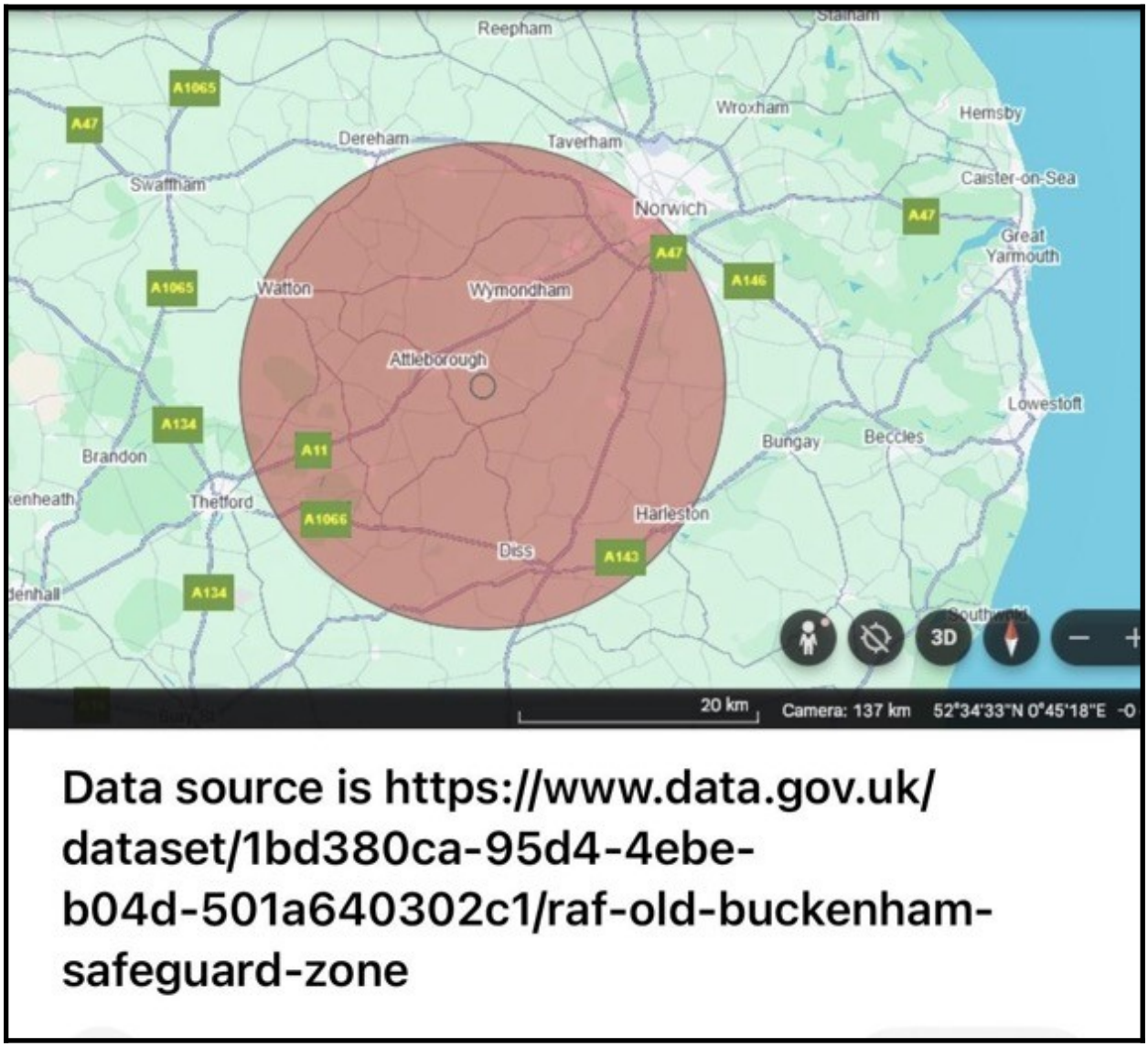
Site 7 sits within the radius of many busy local airfields within a short distance, including Hardwick Airfield at 4 miles, Tibbenham Airstrip at 6.5 miles, Seething Airfield at 6.5 miles and Old Buckenham Aerodrome (which hosts a large annual air show with the Red Arrows in regular attendance) at 10 miles.

There is also a small private airfield on the western boundary of Long Stratton that acts often as a personal, farm-based airstrip used for light aircraft, with occasional helicopter activity.

Site 7 sits under the approach path for Norwich International Airport with numerous large passenger flights seen daily above.

The East Anglia Air Ambulance is regularly seen flying to and from Norfolk and Norwich University Hospital and uses the airspace over Long Stratton for manoeuvre training with fling and glare a major concern.

Many helicopters follow the A140 as a route north/south.



Data source is https://www.data.gov.uk/dataset/1bd380ca-95d4-4ebe-b04d-501a640302c1/raf-old-buckenham-safeguard-zone

The air space above Site 7, and in fact in the skies above the rest of the East Pye Solar proposal, is used on an almost daily basis by the Royal Air Force and the American Air Force for training including jets and very low flying large aircraft. It is commonplace to have ‘dog fights’ above the local villages and the ‘glint’ and ‘glare’ caused by the reflection of the sun on the solar panels, could cause serious safety issues especially in the cumulative impact of the scheme.

Well documented research highlights the vulnerability of aviation to ‘glint’ and ‘glare’ as they can cause temporary visual impairment for pilots, with the risks being more acute

during low-altitude flights segments such as approach and departure, when pilots must maintain precise visual awareness. This is clearly a major issue in this part of South Norfolk with the amount of small airfields in close proximity.

It is strongly felt that a robust Glint and Glare Assessment is completed covering the following: -

1. Solar Position Modelling: Annual and diurnal sun paths to determine potential reflection windows.

2. Receptor Mapping: Identification of all sensitive aviation receptors.

3. Geometric Visibility Analysis: Determining whether reflected rays intersect pilot sightlines.

4. Intensity Estimation: Assessing whether reflections exceed daylight luminance levels likely to cause discomfort or disability glare.

5. Duration and Timing: Identifying when and how long glint or glare would be experienced during operational periods.

6. Cumulative Impact: Where applicable, assessing multiple solar PV developments in the same airspace.

Chapter 12: Noise and Vibration

Introduction

Long-term exposure to construction noise has significant, well-documented negative impacts on the mental health of nearby residents, acting as a chronic environmental stressor that extends beyond simple annoyance.

Persistent, high-intensity noise from machinery, drilling, and piling triggers the hypothalamic-pituitary-adrenal (HPA) axis, a ‘fight or flight’ response, leading to increased cortisol (stress hormone) levels. It also causes cognitive overload, fatigue, anxiety, irritability, and a 30% higher risk of depression.

Key mental health impacts of long-term construction noise on residents include:

Chronic Stress and Anxiety:

- Constant noise keeps the body in a state of alertness, leading to elevated cortisol levels, heightened stress, and anxiety.
- keeps the body in a "fight or flight" mode (sympathetic nervous system activation), which leads to persistent mental fatigue, irritation,

Sleep Disturbances:

- Noise above 30–40 dB during sleeping times can disrupt sleep stages
- Even if you don’t fully wake up, your body reacts
- Construction noise causes micro-awakenings that disrupt deep sleep, leading to insomnia, sleep deprivation, and subsequent fatigue.
- Noise disrupts sleep patterns, preventing necessary rest, which directly leads to increased irritability, reduced cognitive performance, and mood disorders.
- Construction times are from 7am - 6pm Monday to Friday and 8am - 1.30pm on Saturdays
- Many people work shifts, nights and also from home.
- Young children and babies can be more sensitive to sound and disturbance
- These effects are typically linked to environments with continuous noise above 55–60 dB.

Irritability and Emotional Fatigue:

- Persistent auditory irritation lowers mental resilience, leading to reduced patience, moodiness, and a sense of being overwhelmed.

Impaired Cognitive Function:

- Especially relevant to children
- Residents and workers may experience reduced concentration, memory problems, and difficulty focusing, particularly when working or studying from home.

- Impaired decision-making capabilities can reduce productivity and increase occupational risks.
- Learned Helplessness:
- Long-term, uncontrollable noise can lead to a sense of hopelessness or powerlessness, as residents feel they cannot control their own environment.

Noise Sensitivity:

- Individuals with higher sensitivity are more vulnerable to experiencing significant anxiety, depression, and poor sleep quality due to environmental noise.

Tinnitus

- Ringing, buzzing, or humming in the ears
- Often linked to repeated exposure to loud environments including, machinery, power tools etc

Hyperacusis

- Increased sensitivity to everyday sounds
- Can develop after prolonged noise exposure

These happen even at levels below those that damage hearing. They're caused by the body's stress response.

Vulnerable Populations

While noise affects all residents, certain groups are at higher risk of adverse mental health outcomes:

Children:

- More sensitive to noise-related stress,
- can lead to behavioural issues and
- learning disruptions like reduced attention, slower reading development,
- lower memory performance

Elderly:

- More vulnerable to cognitive decline,
- hypertension, and
- depression associated with noise.

Low-income Residents:

- Frequently located in areas with poor insulation and
- lower capacity to move or soundproof,
- leading to higher exposure rates.

On-going Mental Health:

- less tolerance and
- have greater negative outcomes

Mechanisms and Long-Term Outcomes:

Chronic noise exposure acts as a "direct pathway" of harm to the brain, causing neuroinflammation and oxidative stress, which are linked to neuropsychiatric outcomes. The inability to recover from this daily noise leads to:

Increased Depression Risk:

- Residents in high-noise areas are more likely to report higher psychological distress and depression.

Reduced Quality of Life:

- The continuous nature of construction noise causes emotional fatigue, significantly reducing overall well-being.

Physical-Mental Interplay:

- The stress and sleep deprivation can cause cardiovascular issues, such as hypertension and headaches, which in turn exacerbate mental stress.

Work from Home or Retired:

- Tilla Farm Shop on Fairstead Lane will be surrounded by construction noise as well as access on Fairstead Lane.
- multiple homes surrounding the plots across the scheme are retired and enjoy the countryside to walk and hobbies
- Many elderly are less able to escape their home and continuous construction noise.

Even moderate noise can feel excessive if it's continuous or unexpected and irregular.

It is accepted that noise becomes excessive if the noise level is 55-60 dB within your home environment during the daytime and 40-45 dB within your home environment during the night.

There are a number of residential properties within less than 100 metres of Site 7A, who will undoubtedly suffer a noise nuisance and a potential risk to physical and mental health, as a direct result of the construction work

www.decibelinternational.co.uk

Impact of Vibration on Timber-framed and Clay-lump buildings

Vibrations, whether from construction (piling, blasting), heavy traffic, or machinery, can have distinct impacts on timber-framed and clay lump (cob) buildings due to their specific structural characteristics. Generally, these materials are more flexible than masonry, which can allow them to absorb some energy but also makes them susceptible to damage at connections and joints.

Impact on Timber-Framed Buildings

- **Connection Failure:** The primary risk is at the joints. Persistent vibration can cause damage to connectors, steel brackets, and fasteners, particularly in mass-timber or glulam structures.
- **Serviceability and Comfort:** Timber buildings, particularly taller ones, are lightweight and flexible, making them susceptible to wind-induced vibrations that may affect occupant comfort.
- **Cracking in Finishes:** While the timber frame itself may be robust, rigid interior finishes like plasterboard or exterior cladding (brickwork, stucco) are prone to cracking due to movement.
- **Floor Vibrations:** Modern timber-framed buildings may experience, or cause, excessive floor vibrations (e.g., from walking), which can be a, serviceability issue.
- ScienceDirect.com +4

Impact on Clay Lump (Cob) Buildings

- **Vulnerability to Moisture and Settlement:** Clay lump is a rigid but relatively weak material compared to masonry. Vibrations can cause differential settlement of the bearing soils, which in turn leads to cracking in the walls.
- **Brittleness and Cracking:** Clay lump buildings are often older, heritage structures. The rigidity of the clay makes it susceptible to cracks from vibrations, particularly at the corners of openings (doors and windows).
- **Weakened Structure:** Persistent vibrations can exacerbate existing defects, such as loosening the bond between the clay and any added strengthening materials or exacerbating issues in rubble-filled walls. J.S. Held +4

General Observations

- **Damage Patterns:** The first signs of vibration-related damage usually appear on interior, non-structural, or rigid finishes, such as plaster or tile.
- **Source of Vibration:** Construction activities like pile driving and heavy drilling are more dangerous than passing traffic.
- **Mitigation:** To minimize damage, it is crucial to monitor peak particle velocity (PPV) and frequency, particularly in areas with sensitive historic structures. J.S. Held +4

Impact of Vibration on other Vulnerable Structures

Listed buildings account for 2% of the building stock in England and of those listed buildings, only 2.5% are Grade I listed…..Very little information is published on the effects of vibration on listed buildings. However the penalties for damaging a listed building are severe, constituting a criminal offense in some cases.

https://learninglegacy.crossrail.co.uk/document/vibration-management-and-listed-buildings/#:~:text=Where%20the%20ceilings%20were%20visible,of%20the%20timber%20lath%20support.

As Site 7 is surrounded across all sub sites by listed buildings, the risk from vibration and ground movement is high and cannot be migrated against.

During Construction

The potential for artificial light, dust, odour, smoke, steam and insect infestation will have a detrimental impact on amenity and those suffering from respiratory conditions are likely to be severely negatively affected.

No detail has been provided regarding noise levels of either the inverters, the swivelling panels, nor the substation. No ground hum has been described or mitigated. No mitigation for relentless pile driving noise and vibration has been forthcoming.

There is a nursing home within 500 metres of the land parcel 7F and on the route for heavy goods. These are vulnerable patients who have elected to end their days in peace and quiet in a rural, conservation area.

No surveys of nearby Grade II and ancient dwellings have been carried out. No assessment of how clay lump and timber framed buildings will withstand the constant vibration of heavy goods passing. Saxlingham Nethergate minor unclassified road is lined with ancient dwellings that are very close to the road. These buildings have been standing for centuries and have not been subjected to the kind of loads proposed passing their homes.

East Pye Solar say:

- The Scheme currently has a National Grid connection date of 2031. The construction of the Scheme is proposed to be undertaken over an estimated 24-month period. Subject to the DCO consenting process, the earliest construction start date would likely be 2028.
- The construction period will vary across the Site. For the larger sub-Sites there will be opportunities for having multiple construction crews working at the same time.
- There will be temporary construction compounds required for Site 7 although locations have changed during the consultation period.
- The temporary construction compounds will comprise:

- Temporary portacabins for construction operatives (the dimension of the portacabins would vary and the maximum size for individual units is expected to be 10m by 3m with a typical maximum height of 3m);
- Perimeter security fencing with a typical maximum height of 3m;
- Parking areas for construction and workers vehicles;
- A secure compound for storage;
- Temporary hardstanding;
- **Wheel washing facilities (if appropriate water connection and drainage facilities can be provided) *White clawed cray fish reference***
- Storage bins for recyclables and other waste; and
- Temporary lighting for use during construction periods that fall within hours of darkness and within the agreed hours, with the exception of specified circumstances (as set out below).

Construction activities are likely to be carried out Monday to Friday 07:00-18:00 and between 08:00 and 13:30 on Saturdays. However, some activities may be required outside of these times (such as the delivery of abnormal loads, concrete pours for foundations, night-time working for cable construction works in public highways or horizontal direction drilling activities).

Where possible, construction deliveries will be coordinated to avoid HGV movements during the traditional AM peak hour (08:00-09:00) and PM peak hour (17:00-18:00).

The construction phase of Site 7 is likely to take at least 18 months.

Environmental reports produced for Springfield Solar Farm, The Droves Solar Farm and East Stour Solar Farm identified the Construction phase as having the biggest noise impact.

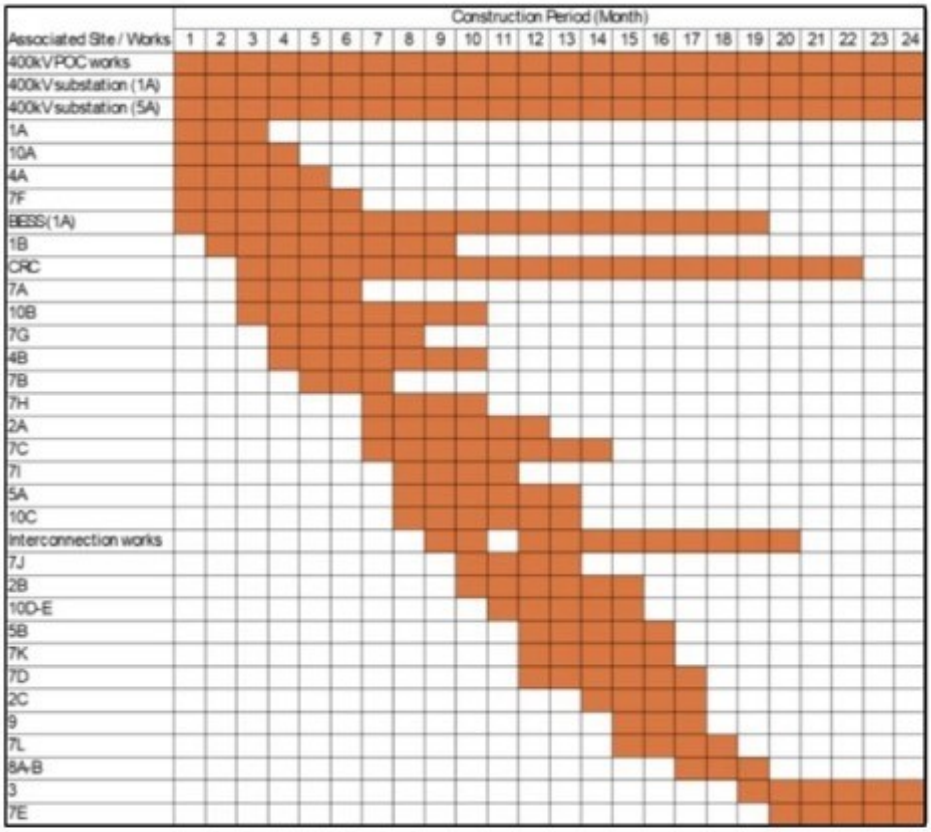


Figure 2.1: Indicative Construction Programme

2.5.2 The core construction working hours (not including start-up and shut-down works) are defined as:

- Monday to Friday from 07:00 to 18:00 (daylight hours permitting);
- Saturday from 08:00 to 13:30 (daylight hours permitting); and
- No Sunday or Bank Holiday working unless crucial to construction (for example, for trenchless crossings which must be continuous activity and the arrival and departures of workers and the delivery of AIL) or in an emergency.

2.5.3 Where practicable, construction deliveries would be co-ordinated to avoid HGV movements during the traditional peak morning (08:00-09:00) and peak afternoon (17:00-18:00) hours. Some activities may be required outside of these times such as the delivery of AIL, concrete pours for foundations, night working for cable construction works in public highways and/or trenchless crossing activities.

Site Preparation (1–3 months)

- Access roads
- Earth moving machinery
- Fencing
- Drainage and erosion control
- Delivery vehicles

Racking & Pile Installation (3–6 months)

- Thousands of steel piles driven into the ground
- Mounting structures assembled

Panel Installation (3–6 months)

- Hundreds of thousands of panels installed
- Cable trenching

Construction of Sub-Station (24 months)

- Earth moving machinery
- Delivery vehicles
- Concrete mixers
- Vibratory rollers
- Drilling and pilling for foundations
- Noise from cranes moving steel frames
- Heavy vehicle movements

Electrical Work (4–8 months)

- Inverters and transformers installed
- DC cabling and AC collection system
- Grid interconnection

Commissioning & Testing (1–2 months)

- System checks

- Grid synchronisation
- Performance testing

The following are examples of decibel levels of some of the machinery used during the construction period: -

- Excavator 70-80 dB –comparable to a busy road
- Concrete breaker 90-100dB – comparable to a jackhammer
- Pilling 100+ dB – comparable to very loud industrial noise
- General construction – 65-85 dB – busy road

It is accepted that at: -

- 50 metres construction is clearly audible and can be intrusive
- 100 metres construction noise can be noticeable but less sharp than at 50 metres.
- 200 metres construction noise is still noticeable, but can blend into surrounding noise

Sound drops by roughly 6 dB every time you double the distance, so to put into context a typical excavator is 80 dB at source: -

- 74 dB at 10m
- 68 dB at 20 m
- 62 dB at 40m (noise of washing machine at mid-cycle)
- 56 dB at 80m (car passing at 30-40 metre distance away)
- 50 dB at 160m (the noise of a domestic dishwasher)

During Operation

The operational phase will result in noise, but to a lower level.

Solar Panels

- The proposal is that Site 7 will have rotating/tracking Solar Panels
- up to 4.5 metres in height.
- Noise emits from electric motors and gears installed in the panel which drives the movement of the panels.
- The noises are not continuous,
- they occur every 10-15 minutes in order to adjust the panel's position by 1-2 degrees.
- The noise emitted is a mechanical whirring, a hum from the motor and clicks from gear engagement

At close range, 1–2 metres, the noise level is typically 40-55 dB and at 20-30 metres distance it is typically 35-40 dB, which as identified previously can disturb sleep at night to properties at close proximity like those on Fairstead Lane and across the site.

Inverters

Solar farm inverters make a steady, low frequency hum and sometimes a light buzz or fan noise, typically:

- 45–65 dB up close – 1 metre
- 35–45 dB at short distance – 10 metres
- 30–35 dB at property boundaries – 50-100 metres

Typical inverter noises: -

- Low frequency hum (transformer type sound)
- Light buzzing from electrical components
- Cooling fan noise (only on some models)
- Occasional clicking when relays switch on/off

These are continuous during daylight hours, because inverters operate whenever the panels are producing power.

132 kW Substation

A Solar farm Substation makes a steady, low frequency hum and sometimes a light buzz or fan noise, typically:

- 50–65 dB up close – 1 metre
- 40-50 dB at short distance – 10 metres
- 30–35 dB at property boundaries – 100 metres

Transformers operate permanently, unlike inverters which shut down at night.

During Decommissioning

The noise of decommissioning the sites will be very similar to that during construction and will resemble a building site with similar traffic.

Conclusion

The sound of construction, operation and decommission will change the nature of the area from countryside to building site and industrial park.

Rather than a sense of peace and mindfulness, which is often why people use or move to the countryside, it will create a sense of not belonging, confusion, frustration and anger.

Chapter 13: Air Quality

East Pye Solar Project introduces localised air quality challenges during construction and, in some cases, could alter local microclimates through land surface changes.

Construction and Infrastructure Impacts

The construction of Site 7 of the East Pye Solar scheme would require:

- Delivery of panels, frames, piles, transformers, cabling;
- Machinery including for excavation, cranes and telehandlers;
- Delivery of concrete for substations and compound;
- Multiple HGV's and AIL journeys per day;
- Congestion to local roads due additional construction traffic;
- Congestion due to road closures and changes to road layouts

The installation phase of solar infrastructure (panels, mounting, inverters, cables) produces air quality issues and can't be mitigated against.

- **Dust Generation (PM10 and PM2.5$PM2.5$):** Earthworks, site clearing, and heavy machinery movement on unsealed roads create dust, particularly in dry and windy conditions;
- **Combustion Emissions:** Increased traffic from heavy-duty vehicles (HDVs) delivering materials, as well as on-site construction machinery,increases emissions of nitrogen oxides (NO) and carbon monoxide (CO).
- **Localised Impacts:** While these impacts are temporary, they must be managed to prevent localised air quality deterioration, especially near sensitive receptors. nsip-documents.planninginspectorate.gov.uk

On narrow lanes the emissions will linger, increasing exposure for residents, walkers and cyclists.

Duration and Intensity

Given the scale of of the scheme and the reliance on the A140, construction would last 24 months across the scheme:

- No recovery period for vegetation;
- Repeated disturbance from overlapping phases;
- Persistent emissions and dust generations;
- Increased traffic disruption to local people so longer periods of commuting time with higher emissions and/or moving commuter routes to small lanes increasing emissions beyond the scheme.

Surface and Microclimate Changes

Large-scale solar farms can alter the surface characteristics of land, which affects local climate and, indirectly, air quality.

- **Albedo Modification:** Solar panels are generally darker than the land they replace (e.g., in arid regions), which reduces surface reflectivity (albedo) and can lead to a cooling effect during the day. Most significant during longer spells of dry weather in summer months when the soil drys, lightens and cracks;
- **Local Cooling/Heating:** While some studies show solar farms can create a "cooling effect" (reducing land surface temperature, particularly during the day), others have noted a potential "heat island" effect, where surface temperatures increase. This became noticeable during the extreme heat waves in Summer 2026 when the temperature at Bloys Grove Solar was measured against a local crop field and the nearby village street. The crop and village street hit 35 degrees whilst the solar field peaked at 49 degrees, 14 degrees higher;
- **Vegetation Loss:** Large-scale land clearing for solar farms can remove vegetation, potentially increasing local dust generation if not managed properly. This will be significant where compounds or substations have been sited where panels aren't planned;
- Although EPS have stated they will aim to minimise the removal of hedgerows and trees, areas for access and cabling as well as widening roads will have significant impact to vegetation loss. Several kilometres of significant hedgerows will be removed for CRC.

Lifecycle Emissions (Indirect)

Manufacturing Pollution: The production of solar panels is energy-intensive and can involve hazardous chemicals, leading to indirect air pollution and greenhouse gas emissions. They are also being manufactured in China in coal power stations and shipped across the World using diesel;

Maintenance Phase:

Although operational emissions will be lower, the scheme still requires:

- regular van and 4x4 visits;
- vegetation maintenance;
- heavy plant repairs;
- panel washing annually up to 450 vehicles making two way trips;
- panel replacement at least twice across the scheme;
- Battery replacement every 5 years.

These trips will add to usual rural traffic particularly when combined with:

- Housing growth in Long Stratton;
- Agricultural and commercial traffic;
- Busy Hempnall roundabout;
- Long Stratton By Pass;

- Maintenance of other solar sites on the scheme;
- Tourism traffic

Decommissioning:

Similar to construction, the end-of-life phase involves heavy machinery and transport, generating temporary dust and emissions.

Cumulative Impact:

The construction of Site 7 will have a significant impact on local air quality to surrounding residents of the multiple sites and as well as the larger area when considered as a cumulative impact along side:

- The other solar sites on the scheme;
- Long Stratton By Pass;
- Long Long Stratton Neighbourhood Plan increasing housing by 1800 as well as a new school, employment hub and facilities;
- Grid upgrades;
- Cabling;
- Road and drainage upgrades;
- Agricultural HGV movements;

These large scale developments will see:

- Increase in diesel emissions;
- Repeated dust events from multiple construction sites;
- Prolonged periods of poor air quality with no recovery time;
- Increased exposure to poor air quality to recreational use of land; or
- Reduced recreational use of land;
- Reduction in tourism to the local area;
- Increase to poor air quality to wildlife and vegetation;
- Dust deposits on listed buildings

The cumulative burden is far greater than the East Pye Solar scheme alone.

Residents:

- Increased exposure to diesel emissions and particulates;
- Reduced outdoor recreation use;
- Dust deposits on homes, gardens and vehicles;
- Dust deposits on businesses and conservation area ;
- Reduced feeling of worth and sense of being;
- Reduced tranquility to rural environment;
- Sense of change to rural environment to industrial environment

Heritage:

- Dust deposits on vulnerable structures and surfaces materials;
- Reduced sense of tranquillity surrounding Conservation Areas and the wider countryside.

Wildlife and Habitats

- Dust smothering hedgerows, flowers and fauna;
- Dust smothering protected ancient trees and woodland habitats;
- Dust entering the water courses and run off into river Tas making the white clawed crayfish breeding ground vulnerable;
- Toxins entering the food supply to wildlife;
- Dust on land used by ground nesting birds;
- Stress on air-quality sensitive species

Public Rights of Way/Bridle Paths

- Walkers, cyclists and horse riders exposed to dust clouds and emissions;
- Reduced enjoyment of rural routes

Tourism

- Reduction in local visitors to the area;
- Reduction in tourism to Norfolk overall as the cumulative impact spreads.

Key Air Quality Issues in Rural Construction

- Fugitive Dust: The primary pollutant is dust from soil-stripping, earthworks, and vehicles moving over temporary roads.
- Trackout: Mud and dust tracked from unpaved site exits onto public roads can cause air pollution far from the actual site.
- Plant & Machinery Emissions: Non-Road Mobile Machinery (NRMM) running on diesel produces significant NO2 and fine particulate matter, which can be high in rural areas that are otherwise clean.
- Impact on Ecology: Dust can settle on surrounding vegetation, reducing photosynthesis and harming local ecosystems, a risk more prevalent in rural settings.
- Topographical Trapping: While open, some rural locations (e.g., valleys and woodland) can experience trapped pollutants.

Chapter 14: Socio-Economics

Site 7 sits in the heart of South Norfolk and considered one of the more tranquil parts of the UK (CPRE) enjoying glorious walks along Boudicca Way, multiple public rights of way, quiet lanes that are enjoyed by cyclists, horse riders, dog walkers and hikers.

The Dark Skies Plan allows people to star gaze without light pollution and supports the nocturnal wildlife to thrive where other places they are in decline.

Our galaxy rising over All Saints, taken by Chris Dean, on Norfolk Country Photographs.



14.1 Impact to tourism

Site 7 sits in the heart of South Norfolk and within easy reach of multiple tourist destinations, local as well as county wide. The north Norfolk coast is within an hour's drive and the Norfolk Broads within 30 minutes.

The villages across Site 7 (Saxlingham Nethergate, Tasburgh, Hempnall and Woodton) are centrally located between the historic, and cultural county capital of Norwich to the north and the Suffolk border with the historic market town of Diss to the south, Harleston and Beccles; all only 10 miles away.

The Suffolk historic market town of Bungay is 8 miles to the east with Wymondham 8 miles to the west.

The impact to the local, and wider area, is likely to have a significant negative effect on the local economy and must be considered.

The City of Norwich is an easy 20 minute drive up the A140 and can also be reached by direct train from Diss or a direct bus from A140 to the city centre.

Norwich is a popular destination for long weekends and short trips to enjoy the visiting London shows at the Norwich Theatre as well as the two impressive cathedrals of St John's Catholic Cathedral and the Norwich Cathedral in Tombstone. Pop-up galleries, many independent shops like Jarrod's Department Store as well as the multiple restaurants serving locally sourced food. The University of East Anglia with the green space of Earlham Park is the home to the amazing Sainsbury's Centre art exhibition facility and are also very popular tourist destinations.

The proposed East Pye Solar project, including Site 7, raises major concerns that it will disrupt local tourism in South Norfolk by transforming rural landscapes into industrial-style energy sites and can't be ignored nor avoided by anyone using the A140 north or south.

The development of 2,700+ acres of land near picturesque local villages such as Hempnall, Saxlingham, Great Moulton and Brooke as well as the central hub of Long Stratton, has led to concerns about its impact on the "enjoyment of the countryside" and the viability of local, rural-based tourist businesses, such as holiday lets, local pubs and restaurants, and small activity sites like the Tank or Steam Museums. These businesses rely on tourism and can be the 'make or break' for some.

Potential impacts on local tourism include:

- **Alteration of Rural Character:** The 4.5m high solar panels (tracker panels), multiple substations and BESS at Great Moutlon will negatively affect the scenic, quiet, and rural nature of the area, which is a major draw for visitors and tourists;

- **Impact on Local Accommodation:** Local residents, such as those running holiday lets fear that the industrial-like installations will make their businesses "completely unviable" because guests come for a quiet, rural experience;
- **Visual Impact and Amenity:** industrialisation of the countryside and the visual impact of the panels and industrial infrastructure will detrimentally impact tourism receptors;
- **Construction Disruption:** a minimum of 2 years construction noise, traffic, and road closures associated with the project could **permanently** discourage tourists and impact local tourism-based businesses;
- **Loss of Public Amenity:** The development will affect public rights of way, and inhibit the enjoyment of walking in the area, a popular activity in South Norfolk in particular the waymarked Boudicca Way;
- **Construction Traffic:** road safety will be negatively impacted, making cycling on previously quiet roads and lanes unattractive.

The scale of the project will significantly alter the area's attractiveness, affecting the local tourism industry, particularly around the 26 villages where the solar panels and battery storage are planned.

The A140 and B1527 are main routes into and out of Norfolk and Suffolk. They will be significantly disrupted over the 24 or so months of construction, with traffic delays caused by East Pye Solar construction vehicles and road alterations having negative impacts for tourism and businesses in local areas as well as county wide.

The A140 is a main route to the Norfolk Broads National Park that attracts almost 8million visitors a year. The Old Buckingham Airshow, 9 miles to the west of Long Stratton, attracts 10,000 visitors over the two day event, which includes displays by the Red Arrows.

Locally, the Tank and Steam museums at Forncett; the Woodlands Trust Tyrells Wood named as one of the most beautiful woods to visit; walking and cycle routes of Boudicca Way and Rebellion Way; and many local farms diversifying with tea shops, restaurants and farm shops like Tilla Farm Shop at Limetree Farm on Fairstead Lane will be devastated by construction traffic preventing visitors to gain access.

With great transport and road networks to all areas of Norfolk, this part of South Norfolk affected by the East Pye Solar scheme, are a good and popular choice for visitors not wanting to stay just in the city.

Two or more years of construction disruption as well the long-lasting visual effect of the scheme is enough to ruin multiple businesses in the local area.

South Norfolk alone contributes more than **£212 million** annually to the local economy.
Broadland and South Norfolk
This figure reflects a significant visitor economy that supports nearly **4,000 jobs and** involves over **1,200 businesses** across the district and the tourist sector remains a critical pillar of South Norfolk's growth strategy.

Broadland and South Norfolk

Key points regarding the local tourism economy include:

- **Wider County Impact**: Tourism is one of Norfolk's largest sectors, worth approximately **£3 billion to £3.6 billion** per year to the county as a whole. Norfolk County Council
- **Strategic Growth**: South Norfolk Council recently identified the visitor economy as a priority for its 2024–2028 Strategic Plan, focusing on its eight market towns. Broadland and South Norfolk
- **Employment**: The sector accounts for nearly **20% of all jobs** across Norfolk, including South Norfolk's rural areas. Norfolk County Council

With Tasway Solar Park paused in planning but proposing to use East Pye Solar infrastructure if passed, the cumulative impact of East Pye and any further renewable industrial infrastructure on Norfolk will have devastating effect to local and county wide tourism which will struggle to recover when the county is an unattractive place to visit. The cumulative area covered by both East Pye and Tasway will be the same as that of Great London.



The ancient buildings and attractive rural landscape of Saxlingham Nethergate and surrounding areas such as Caister St Edmund Venta Icenorum, an Iceni settlement and the Boudicca way which runs along the green and across much of Site 7 including Fairstead Lane, make it a well-visited locality for tourists, with easy access to Norwich and the Broads. Several air B&Bs and Hill House (Grade II listed) holiday/event venue provide accommodation and hospitality. The area is well-used by walking and cycling groups because of the attractive and peaceful landscape which includes several historic monuments. The thriving village community holds summer fetes and there are regular activities in the village hall. The sports fields are in regular use for football and cricket matches. Hot-air balloons based in the area regularly fly over the village. All of these activities are going to be negatively impacted by this project. Tourists are not going to want to visit what will essentially be an industrialised landscape.

Many visitors holiday in this part of Norfolk because of the unspoilt, uncommerialised rural landscapes and quiet lanes. East Pye Solar scheme would discourage anyone who wished to visit for that purpose due to the vast and scattered pattern of solar fields industrialising the landscape for miles around. **Every** footpath and road radiating from Hempnall would have a solar field or electricity substation either adjacent to it or in easy line of sight.

Significantly affected would be Brick Barn AirBnB, a boutique barn accommodating 10 guests. Brick Barn has an uninterrupted view of both sub-sites 7B and 7C, both lying within 250m.

The Snug AirBnB, which lies within the Hempnall Conservation Area, is, like many other places offering holiday accommodation, aimed particularly at guests wishing to explore the beauty and tranquility of the local area, and especially cyclists. This attraction will be completely erased and without doubt, the guests likewise.

14.2 Impact to local businesses

Local enterprise schemes are trying to encourage new businesses to invest into the area especially with the expansion of Long Stratton just to the south of Site 7. But with the considerable impact to the Hempnall roundabout and the A140 as well as other small local lanes, the area will potentially be avoided completely.

In addition to the impact to tourism, deliveries will take longer to arrive which will impact local jobs and businesses that rely on this service.

Trades, like building contractors and independent businesses like plumbers, will take longer to move about the area, reducing the number of jobs taken on per day and potentially raising prices or losing money.

Local businesses, especially hospitality, will be negatively impacted by this project due to the reduction in tourism. A temporary increase in trade for local food shops and hospitality venues may occur during the construction phase only but so will the traffic.

14.3 Impact to agricultural contractors

Employment to local residents in agricultural service is one of the main areas of employment in rural environments, particularly in South Norfolk.

Due to the large area of agricultural land proposed for East Pye Solar, there will be a drop in demand for agricultural workers as local farmers and land owners will require less help. This, in turn, could lead to a lower sense of worth within the agricultural employment sector as well as less income, poorer communities and less local food providers leading to food traveling further to meet demand.

Local contractors may revocate to other jobs or move to another area for work as supply and demand changes. Agriculture employs the largest workforce across the UK and food security relies on knowledge and experience often passed down through generations and from a very early age.

This makes jobs in the following areas vulnerable as agricultural workers do more than just ‘work’ the land, they are custodians of the land and countryside for generations to come:

- Ploughing
- Spreading
- Sowing
- Drilling
- Spraying
- Fertiliser spreading
- Harvesting
- Baleing
- Hedge cutting
- Ditch maintenance
- Road drainage support
- Snow clearing
- Road clearing from fallen trees
- Footpath maintenance
- Seed Providers
- Agricultural Merchants
- Machinery providers

Land parcel 7 is 810 acres of BMV 1-3a and equates almost a third of the total East Pye Scheme. If granted consent it will go towards the total loss of 2718 acres of BMV agricultural land in South Norfolk for a duration of 60 years or forever as the soil would be downgraded to poorer quality and without the commitment of a decommissioning bond, never restored.

East Pye Solar have stated that no full-time onsite jobs will be created after construction as most operations can be carried out remotely.

This scheme will reduce local employment within the extended agricultural sector and reduce a sense of worth in the agricultural industry as a whole.

East Pye have also stated that it is not anticipated that during the construction and decommissioning of the scheme that any local new jobs will be created as an existing workforce, temporarily relocated, will be used. This is clearly at odds with Chapter 6 of the National Planning Policy Framework.

14.4 Impact to home values

Site 7 sits across multiple villages and close to the central and expanding hub of Long Stratton with Site 4 A and B at the northern gateway to Long Stratton dissected by the A140 and with Site 2C at the southern gateway. The entrance and exit will be like a tunnel of panels announcing Long Stratton to anyone entering the area or bidding them farewell. However, why would anyone want to stop to explore the area?

- Falls in the value of houses near to utility solar farms are one of several 'externalities' of solar farm construction rarely considered or, if so, routinely dismissed by solar developers;
- Although some developers and valuers claim there is no effect, or even a slight increase in the value of houses near to solar schemes, more careful studies reveal an adverse effect;
- The closer to a utility solar farm and the larger the installation, the greater is the adverse impact on house values. Houses in more rural areas are more likely to be affected than those in more urban areas as the market is generally slower, although it is difficult to quantify this effect.

https://www.solarq.org/propertyanalysis

Some local estate agents have predicted a 30% drop in house price to anyone within the immediate vicinity, during and immediately post development compared to pre-proposal. To some that is several hundred thousand sterling and has already made their home unsaleable and in negative equity.

House prices are also less likely to recover post development, especially in the countryside where people want fields not industrial infrastructure. Who would choose to live in an area that has been industrialised or at risk of further industrialisation? I wouldn't, would you?

Long Stratton has planned expansion as part of the Long Stratton Neighbourhood Plan (2019-2026) for 1800+ homes, a school and community space over the next 10 years. Creating a sense of being, a desired place to live, work and invest. This will bring new investment and enterprise into the surrounding villages, not just Long Stratton.

Site 7 is surrounded by several Conservation Areas and many listed properties within the full site of the development. Many of these properties have clear and uninterrupted views over open farmland at present. This proposed development absolutely dwarfs all of these properties. Destroys the property value, removes amenities and significantly ruins quality of life in this rural environment.

There is no way that all the properties that are impacted by the sprawl of Site 7 could avoid glint and glare. It would be an ongoing problem and constant source of complaint.

These lands have been farmed for hundreds of years by their respective generations. This proposal would change the character of the rural environment to that of security fencing, CCTVcameras and black glass panels higher than a double decker bus.

The negative effect of East Pye Solar on surrounding homes, multiple villages and the surrounding countryside cannot be mitigated against.

Houses that are currently being valued have reduced by between 5-10%. Worse, the properties affected are not selling and languish on the market. They are a very unattractive proposition for purchasers as potential buyers know that if the project goes ahead the surrounding countryside will be totally spoiled. Where once properties in Saxlingham Nethergate were sought after and rarely on the market for long, they are now being shunned.

14.5 Impact to home insurance

A large scale industrial development nearby to residential properties can significantly impact home insurance policies, leading to:

- increased premiums;
- tighter underwriting restrictions;
- in some cases, difficulty in renewing coverage.

Increased premiums are the primary impact due to:

- Increased presence of machinery;
- higher traffic;
- potential environmental hazards increasing risk;
- Elevated fire risk

Large scale developments can change the local topography affecting natural drainage and potentially flood risks. Reducing natural barriers can exacerbate windstorm risks.

Restriction of coverage to basic perils, rather than comprehensive cover, if perceived risks are too high.

Construction Risks:

Ongoing development can cause;

- noise;
- vibrations;
- dust;
- heavy traffic

Hazards can be temporary but also can also cause more permanent damage especially to vulnerable, older structures like the Grade I listed Churches, clay-lump and wood framed structures.

Changing the nature of the soil can increase or reduce moisture which, in turn, can affect buildings close to developments potentially causing subsidence.

Large-scale solar farms can have an indirect impact on house insurance, primarily through potential changes to property value.

14.6 Cumulative Impact of all proposed development

The cumulative impact of the proposed East Pye Solar scheme, the Long Stratton Neighbourhood Plan, including Tharston park and the development for the by-pass land, and the associated infrastructure is expected to create a "re-engineering of South Norfolk's rural fabric". The combination of massive solar industrialisation and rapid urban expansion (doubling the town's size) will likely lead to significant, long-term changes to the landscape, traffic patterns, and community structure of South Norfolk.

Key Cumulative Impacts:

- **Industrialisation of the Landscape:** East Pye Solar coupled with other nearby proposals of Tasway, Bloys Grove and multiple other renewable energy schemes in planning creates a massive, continuous "energy zone" of panels and battery storage (BESS) bordering and surrounding the residential growth in Long Stratton. Including the Bloy's Grove energy development at Mulbarton 5 miles away (in construction) and the massive energy development on the A47 this transforms a predominantly agricultural area into an energy-industrial landscape or factory.
- **Residential and Visual Impact:** The combination of 1,800+ new homes and solar panels up to 4.5m high (described as the height of a house) will cause significant visual impact on local residents and users of public rights of way.
- **Traffic and Infrastructure Pressure:** While the Long Stratton by-pass aims to relieve the town centre, the combined construction traffic from both the 1,800-home development over the next 10 years and the 500MW East Pye Solar project will likely place immense, prolonged pressure on the A140 and surrounding rural lanes. East Pye Solar have already reported the impact on the A140 by-pass is greater than acceptable and alternatives now need to be found. This will have a knock on effect to all local lanes and villages;
- **Agricultural and Ecological Impact:** The loss of significant areas of productive farmland to both solar panels and housing development is a major concern.
- **Community and Social Changes:** The transformation of a tranquil and rural, agricultural environment across multiple local villages being filled with solar, will permanently change the character of the area.

Specific Project Details:

- **East Pye Solar (Island Green Power):** A Nationally Significant Infrastructure Project (NSIP) aiming for 500MW, impacting villages like Hempnall, Great Moulton, and Saxlingham Nethergate, with potential compulsory purchase of land.

- **Long Stratton Development Plan:** Aims for 1,800 new homes, new bypass, schools, and employment land, effectively doubling the town's size.Broadland and South Norfolk

The cumulative effect, according to CPRE Norfolk, is that the area could become a focus for further industrial development.

Chapter 15: Soils and Agriculture

Introduction

The development of Groundmounted Solar Panels (GPVs) and associated infrastructure is likely to affect soils in a myriad of ways beyond just carbon, during both the construction and operational phases.

(A. Armstrong, S. Waldron, J. Whitaker, N.J. Ostle Wind farm and solar park effects on plant-soil carbon cycling: uncertain impacts of changes in ground-level microclimate)

However, effects are expected to be highly context-dependent and be influenced by several variables, including climate, ecosystem type, land management history, predominant soil type, construction, vegetation establishment and management, and overall operation and management practices. Evidence of such effects has been limited to date. https://www.sciencedirect.com/science/article/pii/S1364032124007585#bib11

If evidence is limited, why is it acceptable to plaster huge swathes of BMV food growing agricultural land in industrial infrastructure that will cause soil damage for decades after the decommission turning this BMV to brownfield? What is the ulterior motive?

15.1 Impact of Solar infrastructure on Soil Quality

Solar infrastructure impacts soil quality through construction-related compaction and erosion, combined with operational changes in microclimate, reduced rainfall infiltration, and altered vegetation patterns. While shading can improve moisture retention, it often reduces plant productivity and soil organic carbon, potentially leading to long-term soil nutrient accumulation, altered microbiota, and reduced soil quality. ScienceDirect.com

Lancaster University looked at the impact on the land solar infrastructure is built on and noted that the soil health was affected. The ground directly under the panels was more compacted, with implications for water infiltration and root growth. It contained lower levels of organic carbon and particulate organic matter (likely due to reduced plant productivity), essential for soil-related ecosystem services (e.g., soil carbon storage). The legacy of past agricultural activity was also evident, with relatively high concentrations of plant-available nitrogen and phosphorus in solar farm soils.

Plant growth and biomass were significantly lower beneath the solar panels than the gaps between them or open pastureland, a reduction attributed to decreased sunlight and changes in the microclimate under the panels.

https://portal.lancaster.ac.uk/portal/news/article/research-sheds-light-on-solar-park-eco-impacts-but-clever-design-offers-a-solution

Key Impacts on Soil Quality:

- **Compaction & Structure:** Heavy machinery during construction causes soil compaction, reducing porosity, disrupting soil aggregates, and hindering root growth.
- **Erosion & Topsoil Loss:** Clearing vegetation and altering drainage patterns can lead to significant water and wind erosion, removing fertile topsoil.
- **Microclimate Changes:** Solar panels create shade, leading to lower soil temperatures and altered evaporation rates. This can create localized areas of higher soil moisture (under panels) but also lead to reduced water infiltration in other spots.
- **Nutrient & Chemical Changes:**Reduced rainfall under panels can decrease nutrient leaching, causing an accumulation of salts and minerals. However, the reduction in vegetation can reduce organic matter input, reducing soil carbon.
- **Microbial Activity:** The altered environment can change the composition and function of soil microbes, sometimes causing them to consume soil organic matter due to a lack of carbon inputs. ScienceDirect.com

Context-Dependent Factors:

- **Vegetation Management:** The presence of vegetation is vital for soil health; sites that manage vegetation well can mitigate negative impacts.
- **Soil Type & Climate:** Impacts are more severe in arid regions (dust) or areas with sensitive soil types.
- **Duration:** While some studies suggest soil can recover during long-term (20-40 year) resting periods, others indicate lasting, potentially negative changes. ScienceDirect.com

15.2 Soils and Compaction

Site 7 of the East Pye Solar proposal lies within a landscape dominated by **high-quality agricultural soils BMV Grade 1-3a.**

These soils are:

- Structurally intact
- Highly productive
- Crop rotated for best soil management
- Rich in biological activity
- Supported by long-established germinate systems
- Free from industrial disturbance

This baseline is **highly sensitive** to physical disturbance, compaction and hydrological change.

Compaction by heavy machinery during construction negatively impacts root growth speed, length, and oxygen access to microbiota. These can all potentially affect soil carbon storage, and thereby limit soils' ecological and climate-regulating functions.

https://www.sciencedirect.com/science/article/pii/S1364032124007585#bib11

Soil compaction is a major, often long-term, environmental impact of ground-mounted solar farm development, occurring primarily through the use of heavy construction machinery.

It causes structural damage, reduces water infiltration, increases surface runoff, and negatively affects soil biodiversity and plant growth.

https://www.gov.wales/sites/default/files/publications/2023-08/impact-solar-photovoltaic-sites-agricultural-soils-land-spep21-22-03-work-package-4.pdf

Impacts During Construction

- **Heavy Machinery Trafficking:** The movement of heavy vehicles during site preparation, trenching, and panel installation crushes soil particles and destroys soil structure, particularly when working in wet conditions.
- **Surface and Deep Compaction:** Compaction can occur near the surface or extend deep into the subsoil (up to 60cm or more), often requiring specialized equipment to fix.
- **Topsoil Degradation:** The compaction, along with potential stripping and storage of topsoil, reduces its fertility and productivity.

Sub-plot 7A on Fairstead Lane is planned for the access point to plot 7A and 7C but also potentially the whole of site 7 and some of site 8 with a haulage route across the site, exiting at Saxingham. This will have a significant impact to the soil compaction of Plot 7A is ALL haulage accesses at this site.

15.3 Soils and Contamination

The Environmental Statement itself identifies Site 7 as having complex ground conditions. The bedrock beneath Site 7 is the Crag Group, classified as a Principal Aquifer, while parts of Site 7 are underlain by Secondary A aquifer deposits. Sub-Site 7A also contains Alluvium, which can include soft and compressible silts, sands, peat and organic material. These conditions increase the importance of preventing contamination and avoiding unnecessary disturbance of the soil profile.

The proximity of Site 7 to Hempnall Beck is particularly concerning. The Environmental Statement identifies the southern part of 7A, all of 7B and parts of 7C as being close to or crossed by Hempnall Beck. Multiple field drains and smaller watercourses are also present. Hempnall Beck has previously been classified as having poor ecological quality and failed chemical quality. Any mobilisation of contaminated soil, sediment, hydrocarbons, concrete washout or other pollutants during construction could therefore have consequences beyond the immediate construction area.

There is also an important issue of uncertainty. The Planning Inspectorate specifically raised concerns during the scoping process that historic ground workings could present a risk of groundwater contamination and that the available ground investigation data covered only a small proportion of the proposed development area. The Inspectorate therefore considered that there was

insufficient information at that stage to rule out significant effects. Although ground conditions have subsequently been included in the Environmental Statement, the reliance on future ground investigation and mitigation does not eliminate the underlying uncertainty.

There is concern about the potential for construction activity to cause:

- compaction and irreversible deterioration of agricultural soil structure;
- mixing of topsoil and subsoil;
- rutting and erosion from construction traffic;
- mobilisation of existing contaminants;
- fuel, oil, hydraulic-fluid and chemical spills;
- concrete and cement contamination;
- contaminated sediment entering field drains and Hempnall Beck;
- pollution reaching groundwater through permeable aquifer materials;
- deterioration of soil drainage and infiltration characteristics; and
- failure to restore the land to its previous agricultural quality following decommissioning.

The applicant should therefore be required to provide substantially more site-specific evidence for Site 7 before consent is granted. This should include intrusive soil and groundwater investigation, testing for relevant contaminants, including hydrocarbons, metals, asbestos and PFAS where justified by the historic land-use assessment, and a clear assessment of pathways between contaminated soil, groundwater, field drains and Hempnall Beck.

There should also be a binding requirement for a Site 7-specific Soil Management Plan covering topsoil stripping, storage, reinstatement, compaction prevention, traffic management, erosion control and verification of soil restoration. The objective should not merely be to remove the solar equipment at decommissioning, but to demonstrate that the soil structure, drainage and agricultural capability have been restored to at least their pre-development condition **as requested by the Secretary of State to Botley West Solar.**

Given the presence of aquifer materials, the proximity of watercourses and the acknowledged uncertainties concerning ground conditions, the risks to soil and water have not been demonstrated to be sufficiently low to justify development at Site 7 without further investigation and stronger enforceable safeguards.

15.4 Impact of Microcracking, Leaching, Glass

The cumulative impact of solar panel glass cracking and subsequent **leaching** is a growing environmental and operational concern, primarily driven by **moisture infiltration**, which can cause toxic materials to seep into the surrounding soil and groundwater over time. While modern solar panels are designed for durability, cracked glass—often caused by hail, wind-blown debris, or improper handling—

breaks down internal seals, allowing rain to dissolve and carry away hazardous materials, including **lead**, **cadmium**, and **selenium**.
https://www.forbes.com/sites/michaelshellenberger/2018/05/23/if-solar-panels-are-so-clean-why-do-they-produce-so-much-toxic-waste/

Environmental and Health Impact (Leaching)

- **Contamination Risks:** When rain or environmental moisture penetrates cracked panels, it can leach heavy metals and harmful substances into the soil. **Sub-plot 7A and 7B Drain towards the Tas valley** with tributaries with a hundred metres of the plots. Toxic runoff could reach the river where breeding white clawed crayfish are found.
- **Toxic Materials:** Depending on the panel type, this may include cadmium telluride (CdTe), which is considered a carcinogen, as well as lead solder (common in silicon panels) and selenium (in CIGS panels).
- **Groundwater Contamination:** Over a 20-30 year lifespan, or immediately following extreme weather damage, these pollutants can enter the surrounding environment and potentially reach groundwater.
- **Increased Waste Pollution:** Improper disposal or failure to manage broken panels can lead to increased contamination in landfills, particularly if they are not treated as hazardous e-waste.
- **There are several private drinking water supplies across plot 7 as well as the Tas Valley and its tributaries within 100m some sub-plots on site 7. Leaching pollution into private water and the river Tas could be catastrophic.**

Performance and Safety Impact (Cracking)

- **Significant Energy Loss:** Microcracks and broken glass reduce panel efficiency. Cracked areas can cause **hot spots** that further damage the panel, potentially leading to a 60% or more reduction in power output.
- **Safety Hazards:** Cracked panels pose an increased risk of electrical shock or fire, especially during wet conditions.
- **Shortened Lifespan:** While panels are designed for 25–30 years, accumulation of cracks can render a panel inoperable much earlier. YDOC

Long-Term Management Challenges

- **High Replacement Costs:** Unchecked cracked panels often require complete replacement, increasing the cost of ownership and reducing the return on investment.
- **Recycling Difficulties:** The accumulation of contaminants and the structural damage make recycling complex, with many damaged panels ending up in landfills rather than being properly processed. ScienceDirect.com

15.5 Lack of Land Management Detail

The scoping report predicted by East Pye Solar in January 2025 provides insufficient detail on how the land within Site 7 will be managed during construction, operation and decommissioning.

The omission totally undermines the credibility of East Pye Solar's claims regarding:

- Biodiversity
- Soil Protection
- hydrological stability
- Landscape mitigation
- Agricultural recovery post-decommissioning
- Control of contamination and chemical inputs
- Management of hedgerows, ditches and field margins

Without a robust, enforceable Land Management Plan the environment effects of the development cannot be properly assessed.

Without detail they cannot show compliance with policy and they cannot demonstrate mitigation effectiveness, they cannot prove their alleged biodiversity net gain and they certainly cannot guarantee soil or water protection.

East Pye Solar cannot be measured against something that doesn't exist and has been omitted.

This is a fundamental and serious flaw and cannot be challenged without detail and cannot be remedied with conditions.

15.6 Soil Recovery Plan

The scoping report produced by East Pye Solar in January 2025 also fails to provide any detail on the soil recovery plan for Site 7 despite proposing to turn 810 acres of prime agricultural land into an industrial landscape for decades to come.

They have failed, to date, to detail how soils can be protected, hydrology can be restored, compaction can be reversed, contamination can be remedied and agricultural activity restored.

Long-Term and Reversibility

- **Persistence of Damage:** Soil compaction may take many years to recover and in some cases can be permanent.
- **Loss of Agricultural Value:** Compaction can lead to the loss of "Best and Most Versatile" (BMV) agricultural land, especially in wetter regions, by reducing its long-term versatility for future cultivation.

https://www.gov.wales/sites/default/files/publications/2023-08/impact-solar-photovoltaic-sites-agricultural-soils-land-spep21-22-03-work-package-4.pdf

"conceptual models linking PV solar energy to soil carbon must incorporate (or at least acknowledge) climate dependencies. Hence, as the PV solar energy industry is expected to

expand rapidly in the coming decades, the utility and results of existing soil Carbon frameworks in other sectors suggest that a universal framework between GPV development and operation, soil carbon, and broader soil health may be timely." ScienceDirect.com

With a cable route and haul road planned for Site 7, removing and storing top soil and sub soil in bunds, soil compaction, and disruption to field drainage systems among other things requires a soil recovery plan to be in place to support the loss of yield and quality through significant disturbance.

15.7 Lack of Decommissioning Bond

East Pye Solar has, to date, failed to provide a Decommissioning Bond, Restoration Guarantee or Financial Security Mechanism to ensure that the land will be fully restored at the end of the operation period.

The Secretary of State requested the applicant for Botley West to 'update the Soil Management Plan to secure the restoration of BMVL to at least their pre-construction agricultural land classification grade upon decommissioning. Appropriate monitoring to aid the soil restoration should also be outlined in the Soil Management Plan.'

The omission creates a significant financial, environmental and legal risk for local authority, landowners and the wider Community.

A bond is standard practice for development that:

- Disturb agricultural soils;
- Introduce contamination risks;
- Install extensive underground infrastructure;
- Require full restoration after long-term industrial use;
- Are operated by Special Purpose Vehicles that may not exist in 40 years.

East Pye Solar meets all of these criteria and the current absence of this Bond means that East Pye Solar fails to demonstrate financial responsibility.

Chapter 16: Ground Conditions

Introduction

Ground Conditions, Geotechnical Risk and Groundwater – Site 7

The Applicant for Site 7 has not demonstrated, through sufficient site-specific evidence, that the proposed solar development and associated electrical infrastructure can be constructed safely and satisfactorily having regard to the ground conditions and groundwater environment.

The Environmental Statement and supporting Ground Conditions Assessment do not adequately establish the detailed ground conditions necessary to demonstrate that the proposed foundations, piling, cable trenches, access infrastructure and electrical substations can be constructed without unacceptable risks.

1. Significant variability in ground conditions

The Applicant's own documentation identifies materially different geological conditions within Site 7A–7L.

Although much of Site 7 is underlain by Lowestoft Formation Diamicton, areas of **Alluvium** occur within 7A and the **Leet Hill Sand and Gravel Member** occurs particularly within 7B and 7C. The Applicant acknowledges that the glacial deposits can contain softer materials and bands of sand and gravel which may be water-bearing.

These are materially different engineering environments.

It is therefore not appropriate to assume that the performance of foundations within stiff Diamicton can be extrapolated across the whole of Site 7. Particular consideration is required at geological boundaries and wherever infrastructure crosses from competent Diamicton into softer alluvial or granular deposits.

2. Site 7A – alluvium and settlement risk

The presence of Alluvium within 7A is of particular concern because such deposits can comprise soft to firm, compressible material and may contain peat, silt, sand and basal gravel.

The Applicant's documentation also identifies saturated sub-alluvial gravels in the southern part of 7A.

This combination creates a credible risk of differential settlement and variable foundation performance. Such effects may be particularly important where PV rows, access tracks, cable routes or other infrastructure cross from stiff Diamicton into weaker alluvial deposits.

The issue is not simply whether the ground can support an individual PV pile. Differential ground movement across an array or between different elements of the development could result in pile rotation, changes in levels, structural stresses and long-term maintenance problems.

The Applicant should therefore provide sufficient intrusive investigation to establish the thickness, extent and engineering properties of the alluvial deposits and demonstrate how differential settlement will be controlled.

3. Site 7B and 7C – sand and gravel

The presence of the Leet Hill Sand and Gravel Member within 7B and 7C introduces a separate set of geotechnical and construction risks.

Granular deposits can have substantially different pile installation characteristics from stiff clay. Dense gravel and coarse inclusions can result in premature pile refusal, deviation or damage, while saturated granular deposits can result in groundwater ingress and unstable excavations.

These conditions are particularly relevant to the installation of underground cables and drainage infrastructure.

The Applicant should therefore demonstrate that its proposed foundation and piling solutions are suitable for the actual granular deposits encountered within Site 7 and provide evidence of representative pile testing or equivalent verification.

4. Differential settlement and piling

The Applicant identifies mini-piling as one potential foundation solution for the PV arrays, with piles potentially extending to approximately 4 metres.

However, the suitability and performance of such piles depend upon the actual geological sequence encountered at each location.

A pile founded within stiff Diamicton cannot necessarily be assumed to have the same capacity or movement characteristics as a pile passing through alluvium, sand or gravel.

The Applicant should provide:

- the geotechnical parameters adopted for pile design;
- expected pile lengths;
- axial and lateral capacities;
- allowable settlement criteria;
- anticipated pile refusal rates;
- procedures for dealing with premature refusal or pile deviation; and
- evidence from representative pile testing.

This is particularly important given the very large number of foundations required across the development.

5. Electrical infrastructure

The ground investigation requirements for lightweight PV structures should not be assumed to be sufficient for the substantially heavier electrical infrastructure.

The proposed substations and associated electrical equipment will impose concentrated loads and may require more substantial foundations than the PV arrays.

Particular attention is required at the **132 kV Project Substation in 7F**.

The Applicant should provide a site-specific assessment demonstrating that the proposed foundation solution can accommodate:

- bearing capacity requirements;
- total and differential settlement;
- groundwater conditions;
- variable superficial deposits;
- potential ground improvement requirements; and
- construction and maintenance loading.

The assessment should be provided before consent rather than relying solely upon a future contractor's detailed design.

6. Groundwater and aquifer protection

Groundwater is a particularly important issue at Site 7.

The underlying Crag Group sand and gravel is identified as a **Principal Aquifer**, while the superficial granular deposits can also provide groundwater pathways.

The construction of piles, deeper foundations and underground infrastructure therefore has the potential to interact with groundwater-bearing strata.

This concern is heightened at 7F because the proposed Project Substation is within a groundwater Source Protection Zone 3.

The Environment Agency has previously identified the need for appropriate foundation/piling risk assessment and has raised concerns regarding the groundwater conceptual model and the potential for piling to create preferential pathways.

The Applicant should therefore demonstrate, through a site-specific hydrogeological assessment, that the proposed foundation depths and construction methods will not create unacceptable pathways for contamination or otherwise adversely affect groundwater resources.

7. Excavation and dewatering

The presence of saturated granular deposits and alluvial material creates a credible risk of groundwater entering excavations.

This could affect:

- cable trenches;
- drainage infrastructure;
- substation foundations;
- temporary excavations; and
- other below-ground works.

Potential consequences include running sand, excavation instability, ground loss, increased dewatering requirements and changes to groundwater levels.

A general commitment to undertake dewatering where required does not demonstrate that these risks have been adequately quantified.

The Applicant should identify the areas where groundwater is likely to be encountered, provide representative groundwater monitoring data and specify the proposed excavation-support and dewatering methodology.

8. Slope stability

Parts of Site 7 are located on valley and sloping ground where the Applicant identifies locally increased land-stability potential.

There is no suggestion that Site 7 as a whole is unstable. Nevertheless, the combination of sloping ground, variable glacial deposits, groundwater, excavation, construction traffic and temporary loading warrants local stability assessment.

Such assessment should be undertaken for relevant substations, access routes, cable trenches, compounds and other significant earthworks.

9. Construction traffic and working platforms

The relatively light nature of the completed PV structures should not obscure the substantially greater temporary loads imposed during construction.

Piling rigs, cranes, HGVs and other heavy construction equipment may operate on ground which is locally weak or saturated.

This is particularly relevant to the alluvial and granular areas.

Wet-weather deterioration of clay soils could result in loss of bearing capacity, rutting and instability, potentially requiring additional stone, ground improvement or changes to the proposed construction footprint.

A detailed working-platform and construction-access assessment should therefore be undertaken for Site 7.

10. Further investigation should be secured by the DCO

It is recognised that detailed foundation design would ordinarily be undertaken after consent.

However, the Applicant should not be permitted to rely upon future investigation to resolve fundamental uncertainties which have a bearing upon the environmental acceptability of the scheme.

Where the assessment of impacts relies upon future ground investigation and construction controls, those matters should be secured through clear and enforceable DCO Requirements.

A **Site 7 Ground Conditions and Foundation Verification Plan** should be submitted to and approved by the relevant authority, in consultation with the Environment Agency prior to consent.

The Plan should include, as a minimum:

1. intrusive ground investigation;
2. boreholes, trial pits and/or CPTs at representative locations;
3. laboratory geotechnical testing;
4. investigation and characterisation of the Alluvium;
5. investigation of the Leet Hill Sand and Gravel Member;
6. groundwater monitoring and seasonal variation;
7. foundation and pile design parameters;
8. representative pile testing;
9. pile refusal and deviation procedures;
10. total and differential settlement assessment;
11. specific foundation assessment for the substations;
12. slope-stability assessment;
13. temporary working-platform design;
14. excavation-support requirements;
15. dewatering methodology;
16. aquifer and groundwater protection measures;
17. protection of private water supplies;
18. construction monitoring; and
19. procedures for unexpected ground conditions.

The evidence presently available does not adequately demonstrate that the proposed development can be safely and satisfactorily constructed across the full range of ground conditions within Site 7.

The principal concern is the combination of **compressible alluvium in 7A, granular and potentially water-bearing deposits in 7B and 7C, variable glacial deposits elsewhere, groundwater resources and the Principal Aquifer, the groundwater sensitivity of 7F, and the proposed extensive use of piling and other ground-penetrating works**.

These matters should be resolved through a properly defined and enforceable process.

The Examining Authority should not treat the present assessment as demonstrating that the geotechnical and hydrogeological risks of Site 7 have been fully resolved. Further site-specific investigation, foundation verification, groundwater assessment and construction controls should be secured before consent can be given.

In detail

East Pye Solar DCO environmental documents, including the **Phase 1 Ground Conditions Assessment** and the **Environmental Statement Chapter 16 – Ground Conditions**. The key point is that **Site 7 is not geotechnically uniform**: most of it is underlain by stiff glacial clay/diamicton, but there are important areas of sand and gravel and, particularly around 7A, softer alluvial deposits.

1. Ground conditions at Site 7

East Pye Solar divides Site 7 into **7A–7L**. The principal ground conditions are:

	Principal ground conditions	**Main implication**
7A	Lowestoft Formation – Diamicton, with **Alluvium** locally	Generally stiff clay, but alluvium can be soft/compressible
7B	**Leet Hill Sand & Gravel Member** over/around the Lowestoft Formation	Granular ground; potentially water-bearing and susceptible to running sand

7C	Lowestoft Diamicton + Leet Hill Sand & Gravel	Variable ground conditions
7D–7L	Predominantly Lowestoft Formation **Diamicton**	Generally stiff clay, but variable glacial deposits can occur

The ES specifically identifies Lowestoft Diamicton at 7A and 7C–7L, while **7B is unusual because the Diamicton is likely to be present but overlain by the Leet Hill Sand and Gravel Member**.

The Diamicton is described as a **pebbly chalky clay**, generally stiff when unweathered, but with the important qualification that softer glacial materials can occur within or beneath it. Bands of sand and gravel can also occur and may be **water-bearing**.

The particular concern at 7A

The BGS mapping identifies **Alluvium at 7A**. Alluvium is described as normally soft-to-firm consolidated, compressible silty clay, potentially containing silt, sand, peat and basal gravel. This is why the overall site-wide compressibility hazard is assessed as **Very Low to Moderate**, with the *moderate* component specifically attributed to peat/alluvium in areas including **7A**.

Site 7 can not be characterised simply as “good stiff clay ground”. **There are localised but important weaker/variable ground conditions that need to be dealt with in the detailed design.**

2. Principal risks to constructing the solar scheme

A. Differential settlement

This is probably the most important structural/geotechnical issue.

Solar panels are generally supported on relatively light piles/posts, but the scheme also includes heavier infrastructure such as:

- inverter/transformer stations;
- substations;
- access tracks;
- fencing;
- cable infrastructure;

- drainage;
- construction compounds; and
- potentially substantial foundations for electrical equipment.

Where the system moves from stiff Diamicton into softer alluvium, made ground, weathered material or loose granular deposits, there can be **differential movement**.

For the PV arrays, even relatively small differential movements can be problematic because they can:

- alter panel alignment;
- impose stresses on panel frames;
- affect tracking/alignment if tracking systems are used;
- cause pile rotation or lateral movement; and
- create maintenance issues.

The risk is particularly relevant around **7A and transitions between geological units**.

B. Piling/foundation variability

The ground conditions could produce substantially different pile-driving behaviour across Site 7.

In stiff Diamicton, piles may encounter:

- high driving resistance;
- flints/chalk/gravel;
- refusal or premature refusal;
- obstructions within the glacial sequence.

Conversely, in sand/gravel or softer alluvial ground, piles may have different axial and lateral capacity and potentially greater movement.

This means that **a single assumed ground model or pile length across the whole of Site 7 would be inappropriate**.

The applicant itself recognises the need for further ground investigation and foundation-specific assessment. The ES also notes the need for piling risk assessments where deep foundations/piling could interact with groundwater.

C. Running sand and groundwater

This is particularly relevant to **7B and 7C**, because the Leet Hill Sand and Gravel Member occurs there.

The Phase 1 GCA identifies a **Very Low to Moderate running-sand hazard**, with the moderate potential associated with granular deposits including the Leet Hill Sand and Gravel Member and specifically identifying **7B and 7C**.

The significance is mainly during excavation rather than simply from the presence of the solar panels.

If excavations extend below the groundwater level, loose granular material can potentially:

- run or flow into excavations;
- destabilise excavation sides;
- cause local ground loss;
- increase pumping/dewatering requirements;
- mobilise fines;
- create temporary construction instability.

This becomes particularly important for **cable trenches, drainage structures, substations and other deeper excavations**.

D. Slope stability

Site 7 occupies part of the valley system between Tasburgh and Hempnall.

The GCA assesses the overall landslide hazard as **Very Low, locally Low**, but specifically identifies the valley slopes as areas where the risk is elevated. It identifies **southern 7A, southern 7C and all of 7B** amongst the areas with this locally increased potential.

The combination of the following needs to be considered:

- sloping ground;
- glacial deposits;
- water;
- excavation;
- temporary construction loading;
- altered drainage; and
- potentially concentrated infrastructure loads

The risk is greater during construction than for the completed lightweight PV arrays.

3. Groundwater and aquifer risk

Site 7 is underlain at depth by **Crag Group sand and gravel**, which is classified as a **Principal Aquifer**. The superficial Lowestoft deposits are generally classified as a Secondary Undifferentiated Aquifer.

This creates a potential pathway between construction activity and groundwater.

The particular concern is **piling or deep foundations penetrating through the superficial deposits towards the aquifer**.

The Environment Agency specifically raised concerns about piling creating contaminant migration pathways into deeper groundwater and recommended **Foundation Works Risk Assessments/Piling Risk Assessments**. The ES incorporates this requirement into the proposed mitigation.

Consequently, the issue isn't necessarily that the solar panels themselves pose a major groundwater risk. It is that **thousands of piles, cable trenches and deeper foundations could collectively interact with groundwater and geological strata**.

4. Shrink/swell clay

The Diamicton is a cohesive clay, so there is also some shrink/swell potential.

The assessment rates the overall potential as **Low to Moderate**. The Diamicton is expected generally to have low-to-medium volume change potential, with the weathered upper layers potentially more susceptible than the underlying unweathered material.

For a solar farm this is less concerning than it would be for conventional buildings, because PV structures impose relatively small vertical loads.

However, it can matter for:

- inverter stations;
- substations;
- concrete slabs;
- buried services;
- access roads;
- drainage structures; and
- interfaces between different foundation types.

5. Dissolution / chalk-related ground risk

There is a **moderate potential for naturally occurring dissolution features** across the wider East Pye site.

The GCA explains that the chalk/Crag interface is a significant karstic horizon and that historic glacial erosion and subsequent deposition can influence where dissolution features occur. The risk is affected by the thickness of overlying deposits, buried valleys and groundwater levels.

This reinforces the need for **site-specific investigation at locations of concentrated structural loading**, rather than relying entirely on desk-study mapping.

6. The overall construction risk on Site 7 is as follows:

PV arrays: Moderate geotechnical risk

The arrays are relatively light and can generally tolerate the ground conditions, but the variable geology means pile design and installation will need to be based on adequate ground investigation. Differential ground conditions are the principal concern.

Substations/heavy electrical equipment: Moderate–High localised risk

These impose much greater foundation loads and may require deeper/heavier foundations. The presence of variable clay, sand/gravel, groundwater and the Principal Aquifer makes detailed geotechnical and hydrogeological design particularly important.

Cable trenches: / Moderate risk

Especially where trenches encounter groundwater, granular deposits or alluvium. **7B/7C** deserve particular attention because of the sand/gravel and running-sand potential.

Construction access/haul roads: Moderate risk

Wet weather could significantly affect clayey ground. Local soft alluvial ground could require temporary working platforms or improved formation.

Slope/earthworks: Moderate locally

The risk is not widespread landslide instability, but particular care is needed around valley slopes, particularly 7B and parts of 7A/7C.

7. The bigger issue: is the scheme adequately investigated?

There is a potentially important planning/examination question.

The published assessment is fundamentally a **Phase 1 / desk-study-led assessment**, supplemented by some targeted investigation elsewhere on the wider project. The documents themselves recognise that the detailed ground conditions and foundation requirements need to be established through further investigation and design.

The scheme is also very large—up to **500 MW**—and Site 7 contains **a 132 kV substation at 7F** and a haul road across most of the site.

That makes the **site-specific ground investigation at 7F particularly important**, rather than treating Site 7 as a single homogeneous area.

The critical questions are:

1. **How many boreholes/CPTs/trial pits have actually been undertaken within 7A–7L?**
2. What are the **depths and thicknesses of the Diamicton, sand/gravel and alluvium**?
3. What groundwater levels were encountered, and over what seasonal monitoring period?
4. What pile type and pile lengths are proposed?
5. Has **pile load testing** been undertaken in representative ground conditions?
6. What happens where piles transition from stiff Diamicton into sand/gravel or soft alluvium?
7. What is the proposed foundation solution for the **7F 132 kV substation**?
8. How will excavations through the running-sand areas be supported?
9. What construction methodology will prevent piling from creating groundwater contamination pathways?
10. How will differential settlement between different geological units be controlled?
11. What wet-weather construction restrictions will apply?

Site 7 is not geotechnically straightforward. The majority of the site consists of relatively stiff glacial Diamicton, however, the **localised alluvium at 7A, extensive granular material around 7B/7C, variable glacial geology, groundwater, valley slopes and the underlying Principal Aquifer create a series of site-specific risks.**

The **most material risks are differential foundation performance, pile installation/design variability, groundwater interaction and running sand during excavation**, with the risk becoming more significant for the heavy electrical infrastructure than for the PV panels themselves.

Executive conclusion

Site 7 risks approximately as follows:

Issue	Risk	Assessment
PV pile installation in Diamicton	Moderate	Probably manageable, but requires site-specific pile testing/design
Differential ground conditions	Moderate–High locally	Significant at geological boundaries and 7A
Alluvium / compressible ground	High locally	Requires specific investigation and foundation treatment
Sand/gravel and groundwater	Moderate–High	Particularly important at 7B/7C
Running sand / trench instability	Moderate	Important for construction methodology
Groundwater / aquifer protection	Moderate–High	A material issue because of deep foundations/piling
7F substation foundations	Moderate–High	Requires considerably more evidence than PV arrays
Slope stability	Moderate locally	Not a general instability problem, but needs local assessment

Shrink/swell	□ Low–Moderate	Manageable, principally relevant to heavier structures
Dissolution/variable chalk interface	□ Moderate	Requires appropriate investigation at concentrated loads
Construction working platforms/access	□ Moderate	Potentially significant in wet conditions
Overall adequacy of current Site 7 GI evidence	□ **Questionable**	

1.What the applicant actually knows about Site7

The applicant's **ES Chapter 16 is not a detailed geotechnical design report**. It expressly says its baseline is principally derived from the **Phase 1 Ground Conditions Assessment**, desk-based information and BGS archive exploratory holes. The Phase 1 assessment itself describes its work as a desk study, site walkover, Tier 1 contamination assessment and preliminary ground-stability assessment.

That matters because the development is not simply a collection of lightweight panels.

The scheme includes:

- PV arrays;
- driven/screwed PV foundations;
- inverter/conversion equipment;
- cable trenches;
- drainage;
- access roads;
- substations; and
- substantial electrical infrastructure.

The applicant says the PV structures may be mini-piled to **up to 4 m**, screw-mounted, or use concrete/other non-penetrative foundations, with mini-piles assumed as the standard option for the assessment.

There is therefore a substantial difference between:

“The ground is generally suitable for a solar farm”

and:

“The applicant has demonstrated that every significant foundation and excavation can safely and satisfactorily be constructed at the proposed locations.”

The latter has yet been demonstrated for Site 7.

2. The geology of Site 7 is much more variable than the headline description suggests

The ES identifies Lowestoft Formation Diamicton across **7A and 7C–7L**. It describes the Diamicton as generally stiff pebbly chalky clay, but importantly says that it can contain or overlie **much softer glacial materials**, and that bands of sand and gravel can occur within or above the sequence and can be water-bearing.

Then there is **7B**.

7B is the exception: the Diamicton is likely to be present but is overlain by the **Leet Hill Sand and Gravel Member**. The ES identifies 7B and 7C as locations containing that glaciofluvial material.

And then there is **7A**, where the ES maps **Alluvium**.

The BGS description used by the applicant is particularly important: alluvium is normally soft-to-firm, compressible silty clay and can contain silt, sand, peat and basal gravel.

The concern

The geological model therefore isn’t:

one consistent stiff clay formation → uniform foundation conditions.

It is more like:

stiff clay / variable glacial deposits / sand & gravel / alluvium / saturated basal gravel / deeper aquifer.

That is a much more complicated foundation environment.

3. Site 7A — the alluvium is a significant local weakness

The applicant identifies alluvium at 7A, and its own description acknowledges that it may be compressible and may contain peat and granular layers.

The minerals assessment goes further and identifies **sub-alluvial gravels** at the southern end of 7A and states that these gravels are **always saturated and require wet working**.

That has several consequences.

Potential problems

1. Differential settlement

If a PV row crosses:

stiff Diamicton → alluvium → basal gravel

the pile response can change substantially over a relatively short distance.

The issue isn't simply vertical settlement of the whole solar array. Differential movement can produce:

- changes in pile head level;
- rotation;
- lateral movement;
- altered panel geometry;
- local stresses in mounting systems;
- problems with trackers, if used; and
- maintenance issues.

2. Heavy infrastructure is more sensitive

A substation or transformer foundation cannot simply be treated like a PV pile.

If shallow foundations are proposed on variable alluvial ground, the applicant needs to establish:

- allowable bearing pressure;
- settlement;
- differential settlement;
- consolidation;
- groundwater conditions; and
- whether ground improvement is necessary.

I have not seen evidence in the ES demonstrating those parameters specifically for Site 7A.

Technical conclusion

7A should not be treated as equivalent to the general Diamicton areas.

A condition requiring additional investigation before construction would be entirely reasonable here.

4. Site 7B — probably the most interesting area geotechnically

7B is particularly important because it is dominated by the **Leet Hill Sand and Gravel Member** rather than surface Diamicton.

The applicant describes this material as glaciofluvial sand and gravel with considerable variability in thickness, particle size and composition.

This creates a different set of problems.

A. Pile behaviour

A driven pile in sand/gravel behaves differently from one in stiff clay.

The design needs to account for:

- shaft resistance;
- end bearing;
- groundwater;
- dense gravel;
- possible cobbles/boulders;
- refusal;
- installation disturbance;
- pile installation tolerances; and
- lateral resistance.

The important question is therefore:

Where is the evidence of actual pile testing in the representative 7B ground?

The Phase 1 assessment cannot answer that question because it is not a pile design investigation.

5. Running sand and saturated granular material

This is not merely theoretical.

The mineral assessment identifies saturated sub-alluvial gravels and the Phase 1 assessment identifies granular deposits in the 7A–7C area.

During excavation, saturated loose granular material can behave very differently from stiff clay.

Potential consequences include:

- excavation collapse;
- running/slumping sand;
- groundwater inflow;
- piping/fines migration;
- increased pumping;
- instability around trench sides;
- loss of ground;
- difficulty installing ducts;
- instability of temporary working platforms.

This is especially relevant to **cable trenches and drainage infrastructure**.

The applicant's mitigation says temporary dewatering will be carried out in accordance with Environment Agency guidance and that licences/permits will be obtained if required.

That is sensible as general practice.

But it is **not the same as demonstrating the actual groundwater conditions and excavation requirements at Site 7**.

6. Groundwater is a much bigger issue than the residual-effects table suggests

This is, in my opinion, one of the most important aspects of the technical critique.

Site 7 sits over **Crag Group sand and gravel**, which the applicant identifies as a **Principal Aquifer**. The superficial deposits are generally a Secondary Undifferentiated Aquifer, with the granular deposits having greater groundwater significance.

More importantly, **7F's Project Substation lies within a groundwater Source Protection Zone 3**.

That makes deep foundation works more consequential.

The concern with piling

If piles penetrate through superficial deposits towards deeper strata, they can potentially create a preferential pathway.

The Environment Agency's scoping response was quite explicit about this. It said the conceptual understanding of groundwater was inadequate and called for, among other things:

- a **Foundation Works Risk Assessment or Piling Risk Assessment**; and
- a hydrogeological risk assessment for HDD works.

That is a very important piece of evidence for an objection.

It means this isn't merely an issue invented retrospectively by an objector.

The statutory environmental regulator itself identified uncertainty in the groundwater conceptual model and the need for further risk assessment.

7. There is an apparent tension in the applicant's assessment

The applicant's ES ultimately assesses residual hydrogeological effects as **Minor Adverse and Not Significant**.

But that conclusion is based heavily on mitigation and subsequent construction controls.

At the same time, the ES says that:

construction risk assessments will be informed by ground investigations undertaken within the Order Limits.

That raises a legitimate question:

If the detailed ground investigation is still to inform the construction risk assessment, how can the applicant be confident at DCO stage that the Site 7 foundation and groundwater risks are adequately characterised?

This is a legitimate **"requirement before works"** issue.

8. 7F deserves separate treatment

7F contains a **132 kV Project Substation**. The Phase 1 assessment identifies this as one of the Project Substation locations.

The applicant's groundwater information also confirms that the 7F substation is within SPZ3.

That means I would treat 7F differently from ordinary PV arrays.

A substation can involve:

- transformer foundations;
- equipment slabs;
- gantries;
- cable structures;
- drainage;
- oil containment;
- heavier concentrated loads;
- deeper foundations;
- access/cranage requirements.

The geotechnical consequence is that **the load-bearing and settlement requirements are more demanding than for a lightweight PV support**.

The question I would put to the applicant

Please provide the ground investigation data, groundwater levels, foundation concept, allowable bearing pressures, calculated total and differential settlements and proposed foundation solution for the 132 kV Project Substation at 7F, including evidence that the solution is suitable for the identified Diamicton and any granular horizons.

9. Site 7's slope conditions also deserve more than a generic assessment

The Phase 1 assessment identifies locally elevated land-stability potential in the valley/slope areas.

I would not argue that Site 7 is generally unstable. That would overstate the evidence.

The more defensible position is:

The scheme introduces excavation, loading, drainage alteration and construction traffic into an area containing variable glacial and alluvial deposits and valley slopes; therefore local slope stability should be demonstrated at infrastructure locations rather than relying solely upon a site-wide qualitative assessment.

10.The groundwater–surface-water connection is particularly important

The applicant itself acknowledges that the peat around CRC7 is likely to be in hydraulic continuity with the **Alluvium and Leet Hill Sand and Gravel Member**, and that the peat is associated with Hempnall Beck.

That is useful evidence.

It demonstrates that the superficial deposits around the Site 7 area aren't simply isolated dry geological layers.

There are potentially connected pathways:

Hempnall Beck ↔ alluvium ↔ granular deposits ↔ groundwater

pathways.

That makes excavation/dewatering and contamination control more important than if the granular deposits were isolated.

11. Private water supplies are another issue

The Phase 1 GCA identifies private water supplies near 7A, 7B and 7C.

In particular, it identifies a private water supply around 130 m southwest of 7A which is located in an area underlain by the Leet Hill Sand and Gravel Member and is assumed to be a shallow supply from superficial deposits.

There is also another recorded water supply approximately 190 m west of 7A, with the borehole encountering chalk.

The applicant concludes that credible risks to private water supplies have not been identified.

The relevant question is:

How can the applicant rule out construction-related effects on shallow and deeper private abstractions when the hydraulic connection between the superficial granular deposits, deeper Crag/Chalk groundwater and surface water is not fully characterised?

12. The applicant's reliance on "further investigation" needs to be controlled by the DCO

The DCO application does not contain final foundation drawings.

However, where the environmental assessment relies on assumptions that are dependent upon **future GI**, the DCO needs to ensure that the later design process cannot simply discover an unexpectedly difficult ground condition and deal with it without appropriate environmental control.

The applicant's Commitments Register says that environmental mitigation is secured through DCO Requirements and/or management plans, while the detailed design is also subject to approval.

That gives an obvious route:

Require a Site 7 Ground Conditions and Foundation Verification Plan.

It should cover, at minimum:

- intrusive GI;
- CPTs/boreholes;
- laboratory testing;
- groundwater monitoring;
- seasonal groundwater levels;
- pile testing;
- pile refusal criteria;
- lateral/axial pile capacity;
- settlement assessment;
- alluvial ground;
- granular ground;
- slope stability;
- temporary works;
- excavation/dewatering;
- aquifer protection;
- private water supplies;
- HDD where relevant.

13. A particular weakness: the ES is primarily an environmental ground-conditions assessment, not a foundation design assessment

The ES establishes a preliminary geological model, but the evidence provided is not sufficient to demonstrate that the proposed foundation and excavation solutions are technically suitable across the materially different ground conditions within Site 7.

14. The 4m PV pile assumption needs scrutiny

The applicant says PV mini-piles may extend to a maximum of 4m.

That assumption is important.

Suppose a pile encounters:

0–1 m weathered clay
1–2 m stiff Diamicton
2–3 m sand/gravel
3–4 m softer material

versus another pile encountering:

0–4 m stiff Diamicton.

Those two piles cannot automatically be assumed to have the same performance.

The applicant therefore needs to demonstrate that the proposed generic foundation envelope is valid for the full range of ground conditions.

Examination question

Please provide the range of geotechnical parameters assumed for the design of the PV mini-piles and demonstrate that the assumed maximum 4m pile length is appropriate for all representative ground profiles within Site 7, including transitions between Diamicton, Leet Hill Sand and Gravel and alluvium.

15. Pile refusal is an underappreciated risk

The glacial deposits contain abundant **flint and chalk gravel**. The applicant itself describes the Diamicton as containing abundant flint and chalk gravel.

The Leet Hill deposits are also gravel-rich.

Driven piles can therefore encounter local hard inclusions.

Potential consequences:

- refusal above design depth;
- damaged piles;
- pile deviation;
- additional piles;
- redesign;
- increased installation time;
- vibration;
- local ground disturbance.

For a very large solar array, even a modest percentage of piles requiring remedial treatment could become a significant construction issue.

The Applicant should provide a **pile installation and refusal protocol**.

16. Access roads may be more problematic than the panels

This is another area where the lightweight nature of PV structures can give a misleading impression.

A PV pile can impose a very small load.

A construction haul road supporting:

- cranes;
- HGVs;
- transformers;
- delivery vehicles;
- piling rigs;

is a completely different proposition.

Soft alluvial areas and wet clay can deteriorate rapidly under construction traffic.

That creates risks of:

- rutting;
- pumping;
- formation failure;
- imported stone requirements;
- increased construction footprint;

- drainage alteration;
- sediment runoff.

The applicant's soil-management controls should include a **construction access geotechnical assessment**. The ES says soil handling and stockpiling will be managed through the Outline Soil Resources Management Plan.

17. Climate and wet-weather resilience

The site will be constructed over multiple seasons.

Clayey ground can become significantly weaker when wet, while groundwater levels in alluvial/granular areas can rise.

The DCO should therefore establish:

- trigger levels for wet-weather suspension;
- temporary drainage;
- working-platform specifications;
- inspection regimes;
- restrictions on HGV movements;
- reinstatement requirements.

Otherwise the construction-phase ground risks are effectively being left to contractor judgement.

18. Further Investigation Required

The ground conditions are sufficiently variable and the groundwater receptors sufficiently sensitive that the applicant should demonstrate, through appropriately targeted intrusive investigation and controlled detailed design, that the proposed infrastructure can be constructed without unacceptable geotechnical or hydrogeological effects.

19. Examination Questions for the Applicant based on the varied Ground COnditions of Site 7

Q1. Ground investigation

Please provide a plan showing all intrusive ground investigations undertaken within Sites 7A–7L, including boreholes, trial pits, CPTs and groundwater monitoring points, together with dates, depths and results.

Q2. Investigation sufficiency

Please explain why the investigation density is sufficient to characterise the transitions between Diamicton, Leet Hill Sand and Gravel and Alluvium within Site 7.

Q3. 7A

Please provide the thickness, engineering properties and lateral extent of the Alluvium and sub-alluvial gravels within 7A and identify what foundation treatment is proposed.

Q4. 7B

Please provide the design geotechnical parameters for foundations within 7B and demonstrate that the proposed PV pile solution is appropriate for the Leet Hill Sand and Gravel Member.

Q5. Pile testing

Please identify all pile load tests undertaken in representative Site 7 ground conditions and provide the resulting axial and lateral capacities.

Q6. Refusal

What proportion of piles is expected to refuse before reaching design depth, and what is the proposed procedure for piles that cannot achieve the specified installation depth?

Q7. Differential settlement

Please provide the proposed criteria for allowable total and differential settlement for PV arrays and electrical infrastructure and demonstrate that these can be achieved across the identified geological transitions.

Q8. 7F

Please provide the preliminary foundation solution and settlement assessment for the 132 kV Project Substation in 7F.

Q9. Groundwater

Please provide groundwater monitoring data for Site 7, including seasonal variation, and explain the relationship between shallow groundwater, the granular superficial deposits and the underlying Principal Aquifer.

Q10. SPZ3

Given that the 7F Project Substation is located within SPZ3, please explain how piling/deep foundation works will be prevented from creating preferential contaminant pathways.

Q11. Piling Risk Assessment

Please provide the proposed scope and methodology for the Foundation Works Risk Assessment/Piling Risk Assessment requested by the Environment Agency.

Q12. Private water supplies

Please demonstrate that construction dewatering, piling and excavation will not adversely affect private water supplies in the vicinity of 7A–7C.

Q13. Running sand

Please identify locations where running-sand conditions could occur and provide the proposed excavation support and groundwater-control methodology.

Q14. Wet-weather construction

What objective criteria will trigger suspension of construction traffic/piling/excavation during periods of high groundwater or rainfall?

Q15. Working platforms

Please provide the design basis for temporary working platforms for piling rigs and heavy construction traffic over the alluvial and granular deposits.

21. Suggested DCO Requirement

No construction of PV arrays, substations, transformers, cable routes or other significant ground-penetrating infrastructure within Site 7 shall commence until a Site 7 Ground Conditions and Foundation Verification Plan has been submitted to and approved by the relevant planning authority, in consultation with the Environment Agency.

The plan should include:

1. detailed intrusive GI;
2. groundwater monitoring;
3. geotechnical laboratory testing;
4. foundation design parameters;
5. pile testing;
6. pile installation/refusal procedures;
7. settlement and differential settlement assessment;

8. alluvium treatment;
9. granular-ground treatment;
10. excavation support;
11. dewatering controls;
12. groundwater protection;
13. private water-supply protection;
14. slope-stability assessment;
15. working-platform design;
16. wet-weather construction controls; and
17. verification/monitoring during construction.

For **7F**, I would make the requirement particularly explicit because of the combination of substantial electrical infrastructure and SPZ3.

Conclusion

Site 7 ground model comprises materially variable glacial and alluvial deposits, including compressible alluvium, saturated granular deposits and areas of water-bearing sand and gravel. These conditions introduce potential risks associated with differential settlement, pile installation and capacity, excavation stability, dewatering and groundwater protection.

The risk is increased for the proposed electrical infrastructure, particularly the 132 kV Project Substation at 7F, where foundation loads and groundwater sensitivity are materially greater than those associated with the lightweight PV structures.

The applicant's current assessment is principally a Phase 1/desk-based assessment supplemented by geological archive information, rather than a detailed foundation investigation. The Environment Agency has itself identified deficiencies in the groundwater conceptual model and has recommended a Foundation Works/Piling Risk Assessment.

Accordingly, the evidence presently available does not fully demonstrate that the proposed Site 7 infrastructure can be constructed without unacceptable geotechnical or hydrogeological effects. The outstanding matters should therefore be resolved through a binding, site-specific ground investigation, foundation and groundwater verification process secured by DCO requirement before construction of the relevant infrastructure.

The Applicant has not yet demonstrated sufficiently, with Site 7-specific evidence, how they will build here safely and without unacceptable effects on ground stability and groundwater—and the DCO should not allow those critical decisions simply to be deferred to the contractor.

Chapter 17: Electromagnetic Fields

Introduction

Site 7 is the largest of all the sites across the Scheme and is made up of 12 sub-sites.

A cumulative size of 328 hectares or 810 acres, with a total external point to point boundary of 14.4km long and an internal area of 2140 acres.

Site 7 is of predominately agricultural fields across five Parishes; Tasburgh, Saxlingham Nethergate, Shotesham, Woodton and Hempnall.

The Conservation Areas of Saxlingham, Saxlingham Nethergate, Hempnall are within a few hundred metres of Site 7 with rural homes and business dotted across Site 7. This area is one of the most tranquil areas of South Norfolk, CPRE map.

The East Pye Solar Scheme proposes to introduce multiple sources of electromagnetic fields (EMFs) into this rural and residential environment not just across this vast cumulative site but from across the other nearby sites within a few hundred metres from site 7, including Site 4, Site 5 and Site 8A.

Site 7 includes inverters, transformers, the proposed 132kV Substation equipment, underground cabling and all the associated high voltage grid connection infrastructure.

Whilst EMFs are a normal by-product of electricity generation and transmission, the scale, proximity and concentration of equipment proposed for Site 7 creates legitimate concerns for residents, particularly where infrastructure is located close to homes, PRoW, private water supplies and sensitive receptors including children and the elderly.

EMFs can cause annoyance and a nuisance as a result of the audible hum from transformers, disturbance to medical devices including pacemakers, and also interference with electronic equipment. Where properties are close to this the impacts are more likely to be noticed; especially to children, elderly residents or residents with chronic health or mental health concerns.

An area that is so tranquil, is slightly elevated above the Tas Valley and with limited narrow country lanes is filled with sporadic agricultural noise and bird song. The cumulative effect of the Scheme in this area will be more noticeable as the baseline will be limited.

UKHSA and WHO guidance recognises that public health concerns about EMFs is itself a health and well-being issue, even where exposures fall below guidance levels.

East Pye Solar has yet to provide and assessment to demonstrate that EMF exposure will remain within accepted limits or that residents will not experience nuisance, anxiety, or health-related concerns.

As there are no mega-scale solar and associated infrastructure research in the rural countryside of the UK to date, it is impossible to state categorically that there will be no impact to residents

living and working within close proximity of these sites. But there are plenty of anecdotal experiences where local residents to sizeable solar schemes are suffering a continuous hum and headaches since a scheme has been running including inverter noise at Cleve Hill in Kent and the permanent humming from the BESS at Swainsthorpe a few miles away from Site 7.

However it's not just humans that can feel the effects of artificial EMF. Nature uses the earth's magnetic field for homing, to navigate and to forage however are also very sensitive to disruptions.

17.1 Bats

Effects on Bats and Activity

- **Reduced Activity:** Studies, particularly in the UK and France, found that total bat activity was roughly halved at the boundaries of solar sites and dropped by two-thirds in the center.
- **Species-Specific Impact:** Six of eight species/species groups surveyed, including Pipistrellus and Myotis species, showed a significant decrease in activity.
- **Behavioural Alterations:** Bats at solar farms tend to shift their flight towards faster and straighter trajectories. This indicates a reduction in foraging (hunting) behaviour, likely due to reduced feeding habitat quality (University of Bristol, British Ecological Society, BSG ecology, Science direct.com)

Conclusion

There is limited research on the effects of EMF on bats however many insects can detect electric or magnetic fields. If EMFs alter insect distribution or behaviour, bats could experience indirect effects through changes in prey availability, albeit largely hypothetical.

The area surrounding and including the East Pye Solar scheme is of crucial importance regarding all bats however in particular the Barbestrelle bats of which the area is of significant importance as a population enhancement area.

17.2 Bees

Bees are very sensitive to electromagnetic fields (EMF). Disruptions stem from both natural solar/geomagnetic storms and anthropogenic (man-made) sources. These forces can impair honeybees' ability to navigate, forage efficiently, and develop properly, which ultimately disrupts their crucial pollination services and plant reproduction (PubMed, Science.org)

Electromagnetic fields from solar panels, substations and power lines disrupt honeybee navigation, foraging efficiency and learning abilities. Because been rely on Earth's magnetic fields and natural floral electric cues, artificial EMFs cause physiological stress and disorientation (PubMed 2023).

For some time, farming practices and the use of pesticides have been to blame for the decline in pollinators. But with the significant increase in man-made interference through renewable energy

infrastructure, robust research on pollinator decline points directly to pylons and substations and the high-voltage infrastructure (PubMed 2023, 2018) (New Scientist 2023) (ehScience 2026)

Albeit solar and inverters generate relatively weak, primarily direct current the management of the sites are the main risk to these environments and resolve around poor habitat management.

Key Impacts on Bees

- **Navigation and Orientation:** Bees have specialised magneto-receptor cells containing iron granules in the abdomen. High-voltage power lines and equipment can easily confuse these systems;
- **Foraging Disruption:** Research shows need are less likely to visit flowers near strong EMF sources. Exposure has been linked to impaired olfactory learning and poor memory retention, leading to lost foragers and struggling colonies (PubMed 2023, 2018);
- **Electrical Noise:** Strong electromagnetic fields create static/parasitic signals around cables that can deter bees from landing on otherwise nectar-rich flowers

17.3 White-Clawed Crayfish

The white-clawed crayfish (Austropotamobius pallipes), an endangered freshwater crustacean, is susceptible to various environmental stressors, and emerging research suggests that electromagnetic fields (EMF) can act as a potential, albeit not fully understood, stressor on aquatic invertebrates.

Research indicates that low-level, non ionising EMFs—such as those from underwater power cables—can create environmental concerns and that existing safety standards, often designed for humans, may not sufficiently protect aquatic fauna. nsip-documents.planninginspectorate.gov.uk

Key findings regarding EMF effects on crayfish include:

- **Synaptic Transmission Enhancement:** Studies on crayfish (specifically the lateral giant interneuron) have shown that static magnetic fields (SMF) (e.g., 8.08 mT) increase the efficacy of synaptic transmission, particularly affecting the neural circuits responsible for "tail-flip" escape responses.
- **Ca2+ Dependent Potentiation:** The enhancement of neurotransmission by static magnetic fields is a calcium (Ca2+) dependent phenomenon.
- **Increased Activity/Stress:** While specific, long-term studies on A. pallipes are limited, broader studies on crustaceans suggest that high-intensity static fields can affect nerve functions and behavior, potential causing increased stress or behavioural alterations.

Contextual Factors:

- **Conservation Status:** The white-clawed crayfish is already heavily threatened by invasive species (signal crayfish) and "crayfish plague," making them vulnerable to any additional anthropogenic stressors, including, potentially, electromagnetic radiation.

- **Habitat Impact:** The primary concern in the literature is that subsea or underground power cables (e.g., in renewable energy projects) generate EMFs that can affect benthic organisms such as crayfish. nsip-documents.planninginspectorate.gov.uk

Conclusion on Effects:

Breeding colonies of white clawed crayfish have been located in the river Tas and its tributaries, which are within metres from the boundary of Site 7.

With sites 7A, 7B and 7C being within less than 100 meters of the river Tas tributaries with water courses flowing towards and into the Tas, as well as CRC 4 and 11 close by and CRC 6 and 7 crossing the Tas to join SIte 7 to Site 6 and 5B respectively , the risk to white clawed crayfish has to be considered significant and cannot be mitigated against.

Current, though limited, research suggests that electromagnetic fields can affect the nervous system of crayfish, potentially altering behavioural responses. Further study is needed to understand the long-term, low-level effects of these fields on the survival, behaviour, and reproduction of the white-clawed crayfish, especially as they are considered a "globally endangered" species.

Chapter 18: Other Environmental Matters

Utilities

Site 7 has multiple utilities running along the boundary edges including at proposed access points, through the site, as well as overhead. These have not been assessed adequately by East Pye Solar.

For example, numerous water nodes line the verges throughout Saxlingham Nethergate and the pipes are very near the surface. The very narrow roads that have been proposed as part of the transport route will be used by extremely heavy goods vehicles. It will be impossible to steer clear of these, therefore damage is inevitable and can't be mitigated.

Water Environment

Water Framework Directive and water environment: the applicant has not proved no deterioration

Site 7 sits in a highly sensitive chalk-stream and chalk-aquifer catchment, with a high degree of hydrological connectivity directly to the Tas chalk stream. Impacts on private water supplies, private sewerage and hydrological connectivity have not been properly assessed.

Any watercourse crossing, ditch crossing, HDD, haul route, trenching, runoff change, compaction, sediment release or pollution pathway must be assessed against the requirement to prevent deterioration in waterbody status. The applicant has not shown that the construction and operation of Site 7 would avoid deterioration of the River Tas system or avoid impacts on priority chalk-stream ecology.

Where a scheme risks deterioration of a chalk stream and harm to protected aquatic species, the legal test is precautionary and evidence-led. On the present material, the applicant has not supplied the required evidence to pass that test.

Site 7 has a greater water sensitivity than many of the other East Pye sites because:

- It lies almost entirely within **Flood Zone 1** however the **Hempnall Beck, a tributary of the River Tas** forms the southern boundary of sub-site 7B and is less than a few hundred metres from sub-site 7A ;
- There are **ordinary watercourses** crossing several sub-sites (7C, 7D, 7E, 7F, 7K and 7L) meaning construction will need to avoid pollution and maintain drainage connectivity;
- Most of Site 7 is within a **Source Protection Zone (SPZ)III (Total Catchment)**, and a small part of Sub-Site 7H falls within a **Drinking Water Safeguard Zone** for surface water. This

means extra care is required to protect groundwater and drinking water resources as any pollutants introduced here could eventually reach groundwater abstraction points used for drinking water. (Environmental Statement, vol 3, Appendix 2.1 - EIA Scoping Report March 2026);

The East Pye Solar Project poses a significant and unacceptable risk to water pipes and general water infrastructure through:

- Ground pressure and pipe damage;
- Tranching and accidental strikes;
- Soil contamination and hydrological change;
- Pollution and sediment infiltration;
- Long term operational disturbance;
- Cumulative development pressures - Site 7 is made up of 12 sub-sites and a total of 808 acres;
- Flooding;
- Pollution to private water supplies;
- Pollution to natural water environments.

These risks conflict with **NPPF** regarding consideration of water in planning decisions:

- **Flood Risk (Core Focus)** -
    - Some areas are within Flood Zone 2 and 3 in sub-site 7B and along Cable Route Corridor 7 at the Hempnall Beck and Tas Valley;
    - Runoff will increase surface water and risk of flooding in an area already susceptible to flooding;
    - As Site 7 mainly slopes towards the Tas Valley, this puts additional pressure and risk to homes in the valley and pollution in the river Tas tributaries which is the home to White Clawed Crayfish.
- **Sustainable Drainage Systems**
    - To manage surface runoff;
    - Mimic natural drainage;
    - Provide environmental and biodiversity benefits not to pollute the natural ponds and waterways already on the sub-sites across 7;
- **Water Quality**
    - Prevent development from polluting rivers - **river Tas**, lakes, ponds and groundwater;
    - Prevent pollution of private water supplies which East Pye Solar has failed to survey;
- **Natural Environment and Catchments**
    - Planning should support protection and enhancements of water-related ecosystems - **river Tas and tributaries**

The Environment Agency noted during scoping that:

- **Some small ordinary watercourses do not have mapped Flood Zones, so relying solely on Flood Zone maps could underestimate local flood risk;**
- **The Flood Risk Assessment should therefore consider these unmapped watercourses and use the latest surface water flood data.**

Sewage

A notable issue at Site 7 is the presence of **Anglian Water Infrastructure.**

The Environmental Statement record that:

- **Pressurised rising mains (sewers)** cross Cable Route Corridor 7 (CRC7) which runs between sub-site 7B and 5B including crossing the Hempnall Beck, a tributary of the River Tas;
- **Anglian Water requested that these assets be recognised because accidental damage during construction could release sewage**;
- The developer's response was that the rising mains are maintained by Anglian Water and are not regarded as existing contamination sources, but they will still need protection during construction; (Environmental Statement Vol 1; Chapter 16 - Ground Conditions March 2026)
- **Anglian Water flagged multiple concerns within their Relevant Response including lack of contact and consultation**.

This means that construction activities such as piling, trenching or cabling installation will require:

- Accurate utility location;
- protective easements around sewer assets;
- agreed working methods with Anglian Water.

Water Supply

The assessment identifies **private water supplies near sub-site 7A, 7B and 7C.**

These are considered likely to abstract from deeper Chalk or Crag aquifers rather than shallow deposits. Protecting these supplies is vital during construction to avoid contamination.

One local resident that will be surrounded by proposed infrastructure on sub-site 7A and 7C, stated on his Relevant Representation that their water is from a bore hole and is very concerned about contamination to his water supply.

Conclusion

The most significant issue at Site 7 is not increased sewage but protecting existing Anglian Water sewer infrastructure and nearby water resources during construction

The lack of communication from East Pye Solar with Anglian Water and the Environment Agency leaves many issues unresolved and can not be mitigated against. This is a major **FLAW**.

High pressure gas main

Sub-Site 7F is constrained by a **high-pressure gas main and additional gas infrastructure** running beneath it, creating unacceptable construction, safety and operational risk.

The site is also subject to a haulage route which is planned be constructed and to run over the high-pressure gas main even though there are easement restrictions within the proximity of the pipeline.

The proximity of:

- deep excavations,
- piling,
- heavy plant,
- permanent concrete foundations,

creates unacceptable **safety, engineering and liability risks**. The coexistence of a 132kV substation, solar infrastructure and high-pressure gas infrastructure in this constrained location represents a **fundamental deliverability failure**.

Note that the pipeline runs very close to the proposed Substation in field 7F. The Pipeline in question runs from Bacton in North Norfolk to the Midlands. The pipe has a diameter of 914mm, is made of steel and buried approximately 900mm below field level. There is an easement strip either side of the Pipeline – 12.2 m wide easement (6.1m either side of the pipeline centre) Note: The following comments are made by United Kingdom Onshore Pipeline Operators Association (UKOPA) in relation to solar farms near buried Pipelines

1. It is essential to recognise the potential risks with co-locating PV installations and buried high pressure gas pipelines.

2. Solar farms act as a source of short and long term direct current (DC) leakage and should be located as far as possible from buried pipeplines.

3. Any developments within 500m of a pipeline should be reviewed to ensure elements such as pipeline access roads, cathodic protection (CP) system groundbeds and AC mitigation measures have been considered. If a CP system groundbed is located within or in close proximity to a PV farm then the groundbed location may need to be relocated which could take time and involve

considerable expensive to the developer, as a new power source may need to be installed, a new groundbed site selected and land purchased.

4. Increase in the AC interference risk to the pipeline may result in AC corrosion on the pipeline.

5. Increase in the lightening risk on buried pipelines from the construction of the PV farm.



High Pressure gas mains pipe at proposed site 7F entrance on Saxlinham Green (grid ref TM2473 9646)

From the Relevant Representation on behalf of National Gas Transmission PLC "*unfortunately the Applicant has not attempted to liaise with NGT on the protected provisions required and as such no progress has been made despite NGT's attempts to enter into discussions dating back to August 2025. NGT is disappointed that appropriate priority does not appear to have been given to the protection of its assets in connection with the Project.*

Until NGT is satisfied that adequate protections have been secured…. ***NGT must object to the Order."***

Conclusion

The high-pressure gas main crosses land parcel 7F and passes close to the proposed substation, creating a fire and explosion safety concern.

This is not peripheral utility issues. A high-pressure gas main close to electrical infrastructure, construction compounds, cabling, fencing and access works is a major constraint.

The applicant has not demonstrated that Site 7 can be constructed and operated safely around these constraints. A DCO should not authorise development over or near such infrastructure on the basis of later discovery and later agreement.

Glass Fibre Broadband

Rural fibre-optic broadband infrastructure is situated within Land Parcel 7; the applicant has not mapped it, consulted operators or users, or assessed diversion, protection or outage risk.

Rural broadband is essential infrastructure for homes, farms and businesses. Damage or diversion could cause significant community and business harm and may materially affect construction feasibility.

Anecdotally, during the construction of the Long Stratton by-pass, the main fibre connection was cut in accident and knocked out services to multiple homes for over two weeks whilst it was repaired.

Additionally, in another section, fibre connection was lost to rural properties east of the by-pass for over four weeks whilst it was identified and repaired.

With mobile phone signal limited in rural areas, and with many blackout zones, WI-FI calling is essential for homes to maintain connection.

Potential Effects on Fibre Infrastructure

While East Pye Solar will not interfere with the signal it presents physical risks to these specific areas:

- Cable Route Corridor (CRC) Crossings: There are seven CRC linking to or through Site 7. There is risk of accidental cable strike on existing buried fibre due to lack of mapping;
- Construction Traffic and Roadworks: Heavy vehicle access to Site 7 will require road widening or temporary access points. Excavation at these points can damage microducts - the thin plastic tubes housing fibre cables - which are often buried at shallower depths than older copper lines;
- Wayleave and Access Issues: large-scale infrastructure on Site 7 could potentially complicate future maintenance access for broadband providers if their existing lines pass through land now designated for a 60 years Solar Scheme Broadland and South Norfolk

Satellite Connection

With limited Broadband connectivity, rural communities rely on satellite services like Starlink. Many mobile phone providers are now abandoning new masts due to long planning constraints and offering back up services via Satellite.

The Scheme includes extensive power conversion equipment, BESS installations and multiple high-voltage substations. The Environmental Statement should clarify whether electromagnetic emissions have been assessed for compatibility with modern satellite Broadband services operating in Ku- nad Ka-band frequencies, including user terminals located within the nearby rural properties, together with any proposed monitoring and complaint resolution procedures should interference be reported during operation.

Mobile Phone Signal

Large scale solar can affect mobile phone signal. As rural phone signals are limited compared to towns and cities, any detrimental effect can be significant.

Solar Panel can:

- Reflect or scatter radio signals (including 4g and 5g);
- Create 'shadowing' effects behind large arrays;
- Slightly weaken signal strength at ground level within or immediately behind a site.

As the panels are 4.5m high and tracking, the cumulative impact of the scheme across the whole area, often near to homes and PRoW, signals could be weakened and the effect significant in places where signal is an issue already.

Inverters and electrical equipment:

Solar fields include inverters and transformers which can emit electromagnetic interference if poorly shielded.

Although the risk is low impact it relies in developers to be compliant with regulations and evidence is based in small solar arrays not mega developments. This has not been assessed.

Blocking Line-of-Sight

Mobile phone signals rely partly on line-of-sight to masts, especially for 4g/5g.

A solar development could effect this if it:

- Sites between a user and a nearby mast;
- Includes ancillary structures (substations on 7F, security fencing, CCTV poles).

East Pye Solar has multiple substations including a 132kV on sub-sites 7F, 4B and a 400kV on Sub-site 5B.

In addition to this, the arrays are tracking panels that move, will be surrounded by fencing and CCTV. Rural signals can already be intermittent and weak without additional interference. A recent outage to multiple masts serving multiple providers in a 10km radius and lasted 9 weeks after changes were made to service.

The cumulative effect of this development could cause mobile phone signal issues across the area which has not been accessed. by East Pye Solar.

18.2 Major Accidents and Disasters

For **East Pye Solar Site 7** (the group of sub-sites around **Hempnall, Tasburgh, Saxlingham Nethergate and Woodton**), the main **Major Accident and Disaster (MAD)** concerns identified in the planning application are not the solar panels themselves, but nearby hazardous infrastructure and construction risks.

The Environmental Statement and consultation documents identify the following:

1. **Major Accident Hazard Pipeline (MAHP)**
    - Site 7 lies within the consultation zone of a **National Gas high-pressure transmission pipeline**;
    - The principal concern is accidental damage during construction, particularly excavation for cables, access roads and foundations;
    - A pipeline rupture could result in fire, explosion and significant risk to workers and nearby receptors. Because of this, National Gas must be consulted and protective easements and safe working methods are required.
2. **Major Accident Hazard Site (COMAH establishment)**
    - The Health and Safety Executive advised that the application falls within the consultation zone of:
        - **Gas Power Services Ltd., Harveys Lane, Seething (HSE Site Reference H3561)**.
    - This means HSE considers Site 7 sufficiently close to a regulated hazardous installation that land-use planning controls apply;
    - The developer states that consultation with HSE has been undertaken and buffers incorporated into the design.
3. **Electrical infrastructure**

    Site 7 includes proposed:
    - a **132 kV project substation** (Sub-site 7F)
    - Seven different underground cable routes connecting different Sub-Sites on 7 to each other as well as to other Sites of the Scheme;

    Potential accident scenarios include:

    - transformer fires;

- electrical faults;
- arc flash;
- oil leaks;
- construction accidents involving high-voltage equipment. These are treated as standard industrial hazards with mitigation through design and operational controls.

4. **Construction traffic**
   During construction there is potential for:
   - HGV collisions;
   - conflicts with local roads;
   - abnormal load deliveries;
   - interaction with agricultural traffic.
     These are managed through Construction Traffic Management Plans rather than being regarded as significant major accident risks.
5. **Fire risk**
   Fire scenarios considered include:
   - transformer fires;
   - electrical equipment fires;
   - vegetation fires around solar arrays;
     The Environmental Statement concludes these can be controlled through design, maintenance and emergency planning.

The developer's Environmental Statement concludes that:

No significant major accident or disaster effects are likely to arise, provided the embedded mitigation measures are implemented. Those measures include consultation with National Gas, protection of utility assets, construction management plans, emergency procedures and maintaining appropriate separation distances.

But, it is worth noting that the Developer has not engaged with National Gas Transmission PLC. From the Relevant Representation on behalf of National Gas Transmission PLC "*unfortunately the Applicant has not attempted to liaise with NGT on the protected provisions required and as such no progress has been made despite NGT's attempts to enter into discussions dating back to August 2025. NGT is disappointed that appropriate priority does not appear to have been given to the protection of its assets in connection with the Project.*

Until NGT is satisfied that adequate protections have been secured…. ***NGT must object to the Order."***

Conclusion

The main issues that should be given the greatest scrutiny are:

- **Proximity to the high-pressure National Gas transmission pipeline** (arguably the most significant external hazard).

- **Location within the consultation zone of the Gas Power Services COMAH site at Seething.**
- **High-voltage substations proposed within Site 7.**
- **Construction-phase excavation near buried utilities and associated HGV movements.**

18.3 Glint and Glare

Introduction

Glint and Glare refers to the reflection of light bouncing off the solar arrays as the sun hits them at a specific angle.

With the cumulative effect of the arrays, which will be visible across the area from most places, this could be significant in particular when the topography of the landscape is relatively flat with slight undulation like it is in this part of South Norfolk.

Sites near roads and homes will have greater impact.

Effects (Glint & Glare) Air Fields

Site 7 sits within the radius of many busy local airfields within a short distance, including Hardwick Airfield at 4 miles, Tibbenham Airstrip at 6.5 miles, Seething Airfield at 6.5 miles and Old Buckenham Aerodrome (which hosts a large annual air show with the Red Arrows in regular attendance) at 10 miles.

There is also a small private airfield on the western boundary of Long Stratton that acts often as a personal, farm-based airstrip used for light aircraft, with occasional helicopter activity.

Site 7 sits under the approach path for Norwich International Airport with numerous large passenger flights seen daily above.

The East Anglia Air Ambulance is regularly seen flying to and from Norfolk and Norwich University Hospital.

The air space above Site 7, and in fact in the skies above the rest of the East Pye Solar proposal, is used on an almost daily basis by the Royal Air Force and the American Air Force for training including jets and very low flying large aircraft. It is commonplace to have ‘dog fights’ above the villages of Long Stratton and Stratton St Michael and the ‘glint’ and ‘glare’ caused by the reflection of the sun on the solar panels, could cause serious safety issues especially in the cumulative impact of the scheme.

Well documented research highlights the vulnerability of aviation to ‘glint’ and ‘glare’ as they can cause temporary visual impairment for pilots, with the risks being more acute during low-altitude flights segments such as approach and departure, when pilots must maintain precise visual

awareness. This is clearly a major issue in this part of South Norfolk with the amount of small airfields in close proximity.

It is strongly felt that a robust Glint and Glare Assessment is completed covering the following: -

1. Solar Position Modelling: Annual and diurnal sun paths to determine potential reflection windows.

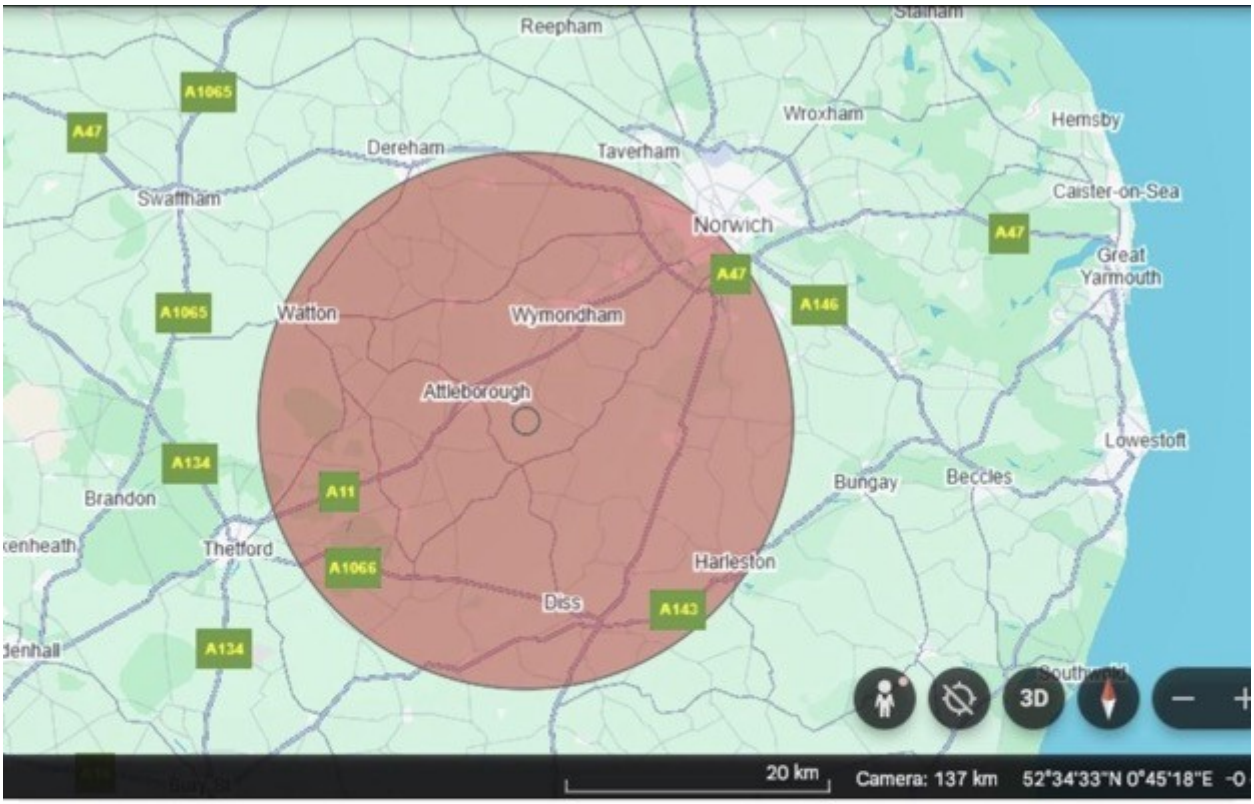
2. Receptor Mapping: Identification of all sensitive aviation receptors.

3. Geometric Visibility Analysis: Determining whether reflected rays intersect pilot sightlines.

4. Intensity Estimation: Assessing whether reflections exceed daylight luminance levels likely to cause discomfort or disability glare.

5. Duration and Timing: Identifying when and how long glint or glare would be experienced during operational periods.

6. Cumulative Impact: Where applicable, assessing multiple solar PV developments in the same airspace.



Data source is https://www.data.gov.uk/dataset/1bd380ca-95d4-4ebe-b04d-501a640302c1/raf-old-buckenham-safeguard-zone

Roads

- Road Receptors – Glint and glare may reduce a driver's vision of the road if reflections occur, even fleetingly or simply distract the driver, as is happening on the A140 at Mulbarton with Bloys Grove, 3.5km north of Site 7, as the eye is drawn away from the road with the peripheral vision picking up the glint off the panels.
- This could negatively impact the safety of nearby roads and is typically assessed within 1km of a solar development. (PagerPower).



Bloys Grove, Mulbarton (whilst still in construction), and taken at approx 5.40pm in March from a moving car with glimpses of sun through light cloud from a A140 over 1 km away.

Site 7 can be extensively seen from the A140 which is slightly elevated. With tracking panels across Site 7 sitting east to west, the panels will be facing the A140 for the latter part of the day and facing the Broaden Lane, Wash Lane and the main route of B1332 to the east.

The developer's glint and glare assessment found that there were significant adverse effects yet concluded that after mitigation screening the effects would be minimal. However mitigation itself changes the overall character of the landscape.

Homes

The receptors were residents of nearby farms and houses, users of local roads surrounding the site parcels, users of local footpaths crossing or adjacent to the site. But the cumulative effect of Site 7 will have a greater significant impact especially as mitigation will not come to fruition for decades.

What the developer failed to do was consider glint and glare from upstairs windows.

- Dwelling Receptors – Extended periods of glare towards living spaces within a home may cause a nuisance for residents and could negatively impact residential amenity. Terrain heights are important to consider, as dwellings are typically assessed within 1km of a solar development (PagerPower).

Saxlingham Nethergate - At least a dozen house are less than 200 metres from the proposed solar fields, all them will have a clear view, and East Pye Solar has not given any consideration of Glint and Glare to properties from an upstairs window and therefore impossible to ignore the glint and glare.

Site 7 has slight undulation with Sub-plot 7A being closest to Tasburgh and the A140. It slopes north-east to south-west with East Pye Solar planning 4.5m panels tracking the sun east to west. This field, as well as others, will not only be visible to properties and road users on the A140 Norwich Road but will be susceptible to glint and glare. As this field is elevated at the east boundary the glint and glare will be visible from residential homes and businesses all along the Tasburgh area of the A140 including from the Countryman Pub and garden.


Taken from the Countryman Pub, A140
facing East
7A


Stood on Fairstead Lane at the
south west boundary of 7A looking
towards the A140
The Countryman Pub
Text


Photo taken Fairstead Lane, SW boundary of 7A looking NE. Site elevates towards NE of plot where visible tree line is reduced due to elevation.

Chapter 19: Cumulative and In-Combination Effects

East Anglia energy usage is one of the dirtiest in the UK yet is a major producer already of renewable energy.

East Anglia is already achieving and exceeding regional targets for renewable energy, as acknowledged by East Pye Solar, however East Anglia is not benefiting.

The region is already a **manufacturing energy plant for other regions whilst the regional consumption is 'dirty' energy.**

The local Grid is almost at capacity with no plans for being updated.

The NESO app shows that the East England region has its main source of energy as solar during main daylight hours.

But **the carbon intensity is one of the highest in the country.** In fact **East England is generally 13th out of 14** regions with only South Wales showing as consistently worse and their production is mainly gas! Even London is significantly better yet is mainly 'imports' and gas.

Even with the vast amount of off-shore wind visible from the beaches all along the Norfolk coastline, there is almost no local impact as the East England wind percentage is negligible unless the wind is blowing. Wind then offers low carbon intensity and is effective during nighttime hours too (when it's blowing).

Regional carbon intensity in the NESO app is not determined only by the percentage of renewables generated within that region. It is based on the **electricity actually being consumed** in that region at that moment, including power flowing across transmission boundaries and from interconnectors.

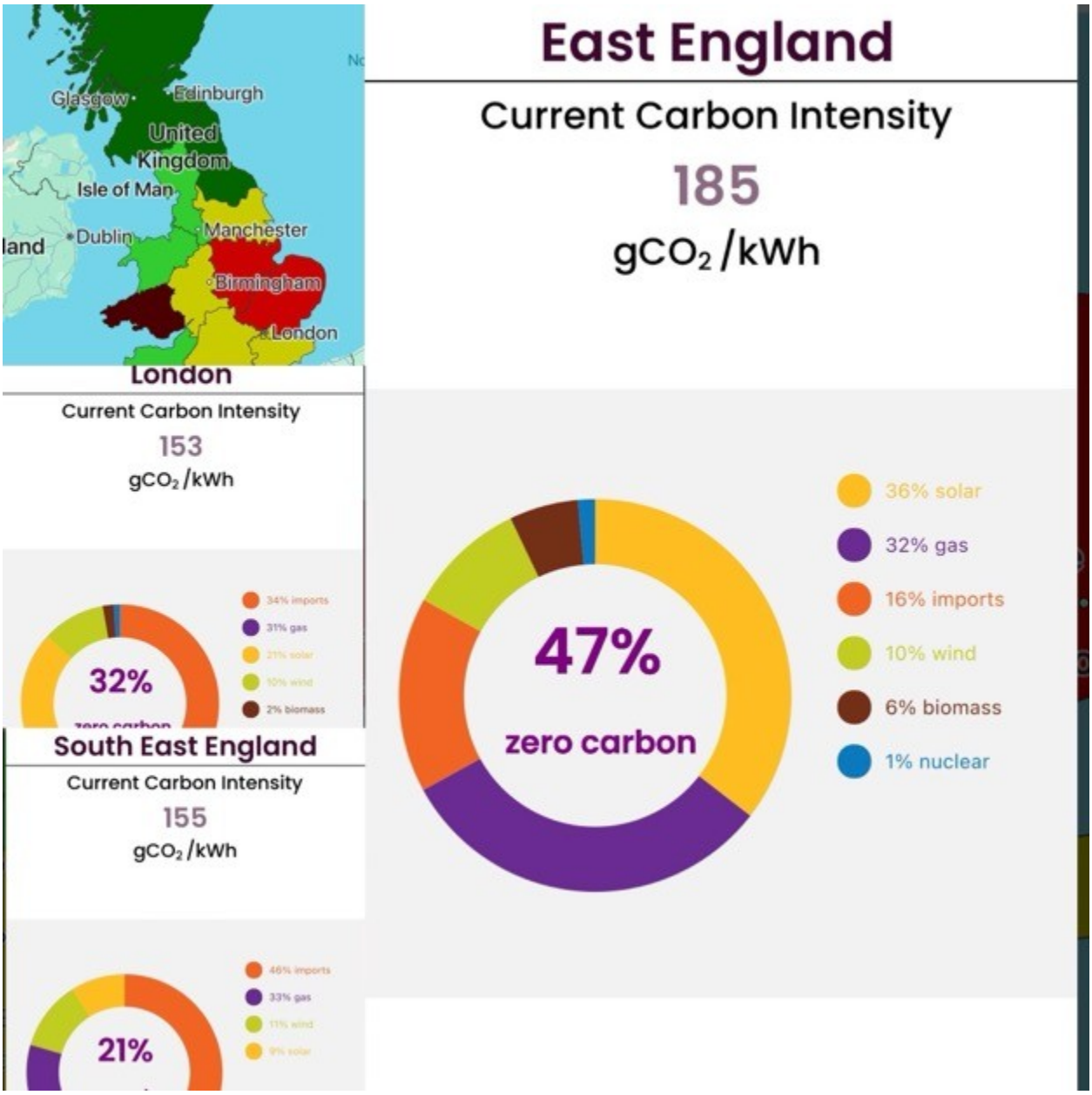
For example, East England solar was at 48% at 2.45pm on a sunny June afternoon, the East England was importing 25% of its electricity but imports aren't necessarily low carbon.

The electricity could be generated by:

- gas stations elsewhere in Britain;
- imports arriving through interconnectors from continental Europe;
- power from regions with higher fossil fuel generation.

So where is our solar renewable production going?

Solar output does not displace gas locally and considering the above snap shot, East Anglia was producing a lot of solar power. However, this region is also a major transmission corridor carrying power southwards towards London and the South East which would explain why their carbon intensity is always much lower and their biggest supply is 'Imports'.



This is from NESO app at 4pm 1st July 2026

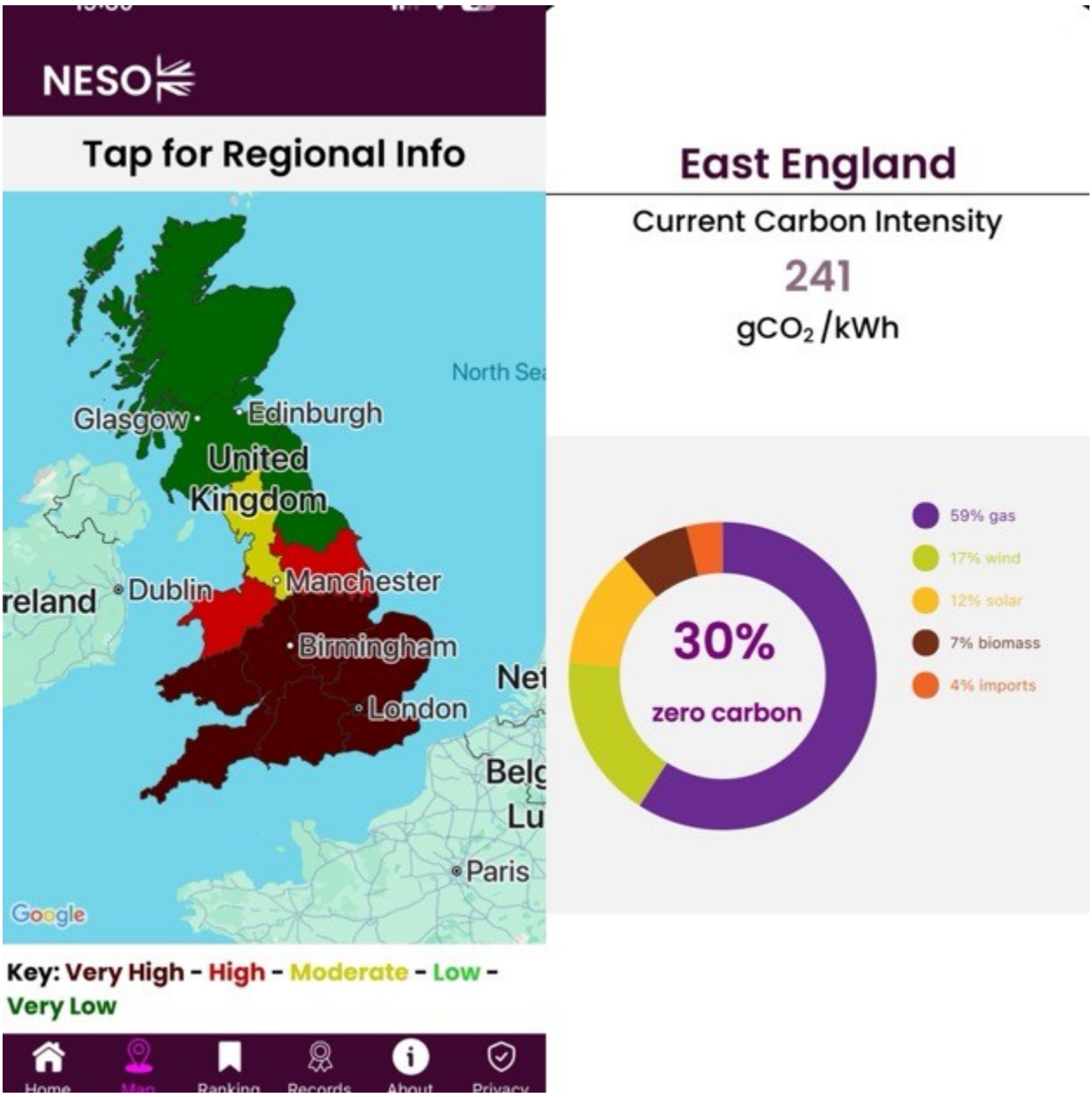
The solar generated in East Anglia does not generally stay there as the grid cannot cope with the fluctuations so it will have been **exported** to neighbouring regions. Meanwhile, electricity flowing **into** the region from elsewhere could have a **higher carbon content.**

Carbon intensity is heavily influenced by marginal generation in the UK grid and therefore will reflect the marginal generator that is adjusting the output to balance supply and demand. That will be gas.

If the East England demand input were met by gas elsewhere on the system, the regional carbon intensity will remain relatively high despite the abundant local solar generation.

If generation in East Anglia grows faster than transmission capacity or demand, the increase in the amount of solar output via East Pye Solar (as well as other projects across the region) will be constrained or curtailed during sunny periods.

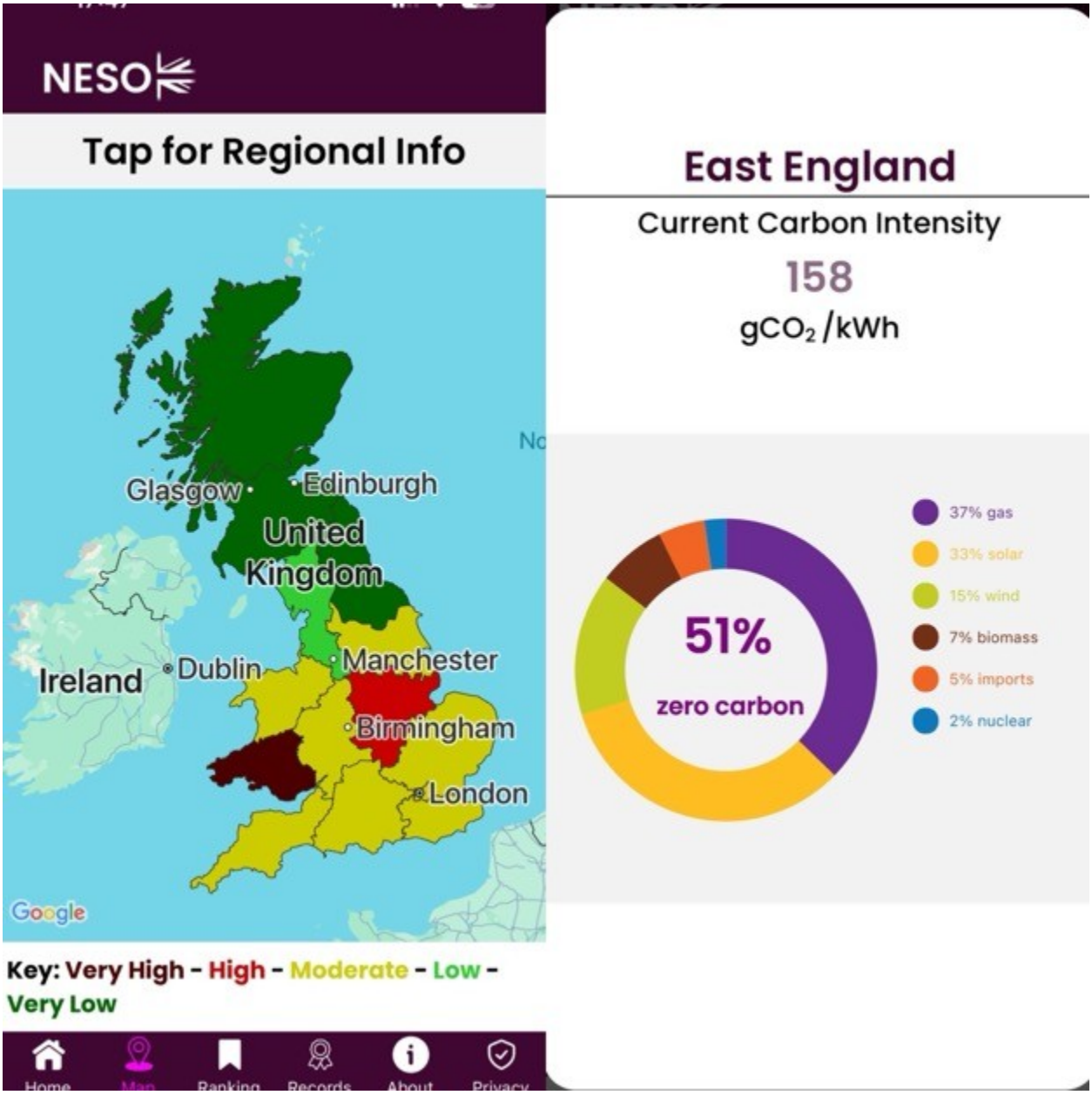
On 30th June the southern UK was mainly using gas even when the sun was shining.



NESO 30th June

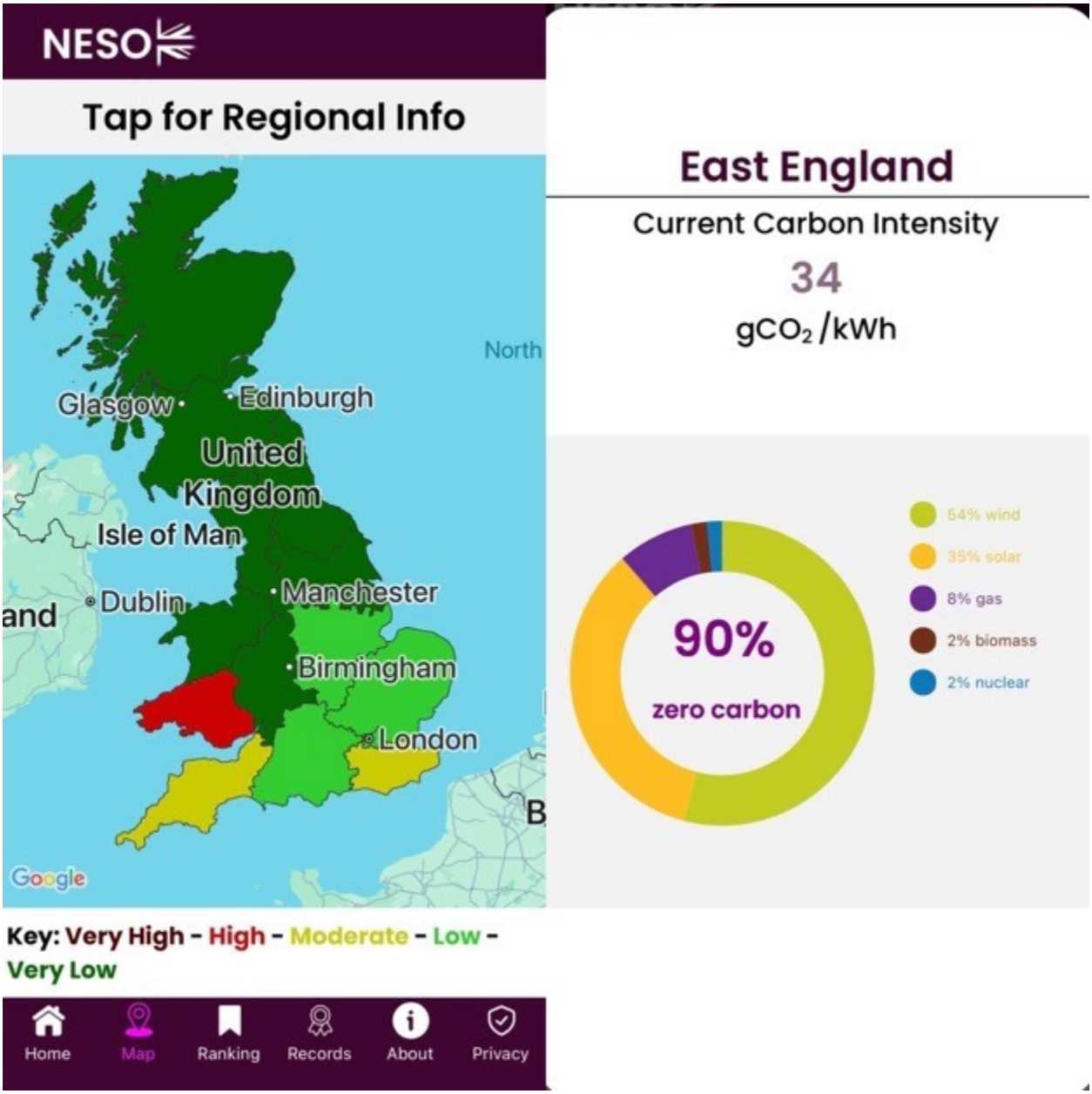
If solar is frequently curtailed because transmission lines are full, the carbon benefit per installed MW becomes lower than if the same project were built in an area with spare network capacity.

Interestingly, the lowest East England carbon intensity for nearly a week was at 5.30pm on 1st July when the main supply was gas.



NESO 1st July 5.30pm

However it's interesting to see the next morning, 2nd July, when East Anglia was very windy and what happens to the carbon intensity in the region. That's because our transmission system is designed to carry off shore wind and not solar.



East England, 2nd July 2026 10.35am

So the question is, is East Anglia the right place for another large solar factory or should the next best investment in East Anglia be grid reinforcement and further local offshore wind connections?

East Anglia is being proposed as a renewable energy park across the region with multiple Solar renewable NSIPs of similar size to East Pye Solar, like prospectors in the gold rush. The devastation this will bring will change this quiet, rural county, that is hugely agricultural, into an industrialised energy factory.

This will destroy the regional tourist industry, the county's largest economic sector bringing in £5.9 billion (including Suffolk) and supporting 54,000 jobs.

The sheer scale of this speculative project would transform this working rural environment into an industrial landscape.

81% of proposed parcels of land are designated BMV Grade 1-3a that have been farmed for hundreds of years and would continue to be so, if not used for renewable energy.

The area contains, and is surrounded by many important archeological sites, historical monuments, listed properties and historic places of worship as well as significant landscape character and protected wildlife habitats.

The destruction and fencing off of land will have a terrible and profound impact on all species of wildlife. Included in this are many protected species which can not be mitigated against.

The Cable Route Corridor will cause destruction and deprivation to many farming businesses through the 2 year construction phase, and beyond, as the soil will take years to recover from bund storage.

The landowners involved in the acquisition of rights for cabling have received little consultation, structured information to make an informed decision, have been pressured, threatened and bullied to sign contracts even though plans for the cabling are not complete nor thorough. Additionally, East Pye Solar have not explored alternative routes to avoid farm land; the routes are dissecting fields diagonally or straight down the middle to incorporate the shortest or most convenient location to East Pye Solar, without considering impact to landowners involved as well as expanding the corridor width from 20m to 50m.

The negative impact to multiple landowners not voluntarily involved to benefit the private profit of 9 landowners and Island Green Power.

The Scheme is disconnected, not just from site to site, but from north to south.

The total of the scheme's cabling is 24 km but Cable Route Corridor 4 is 8km long, a third of that total. This demonstrates the disconnect of the southern 'cluster' Sites 1,2, and 3 as well as the

infrastructure of the BESS, Substations and National Grid transmission substation at Great Moulton, to the majority of energy producing Sites in the north.

The choice of location for this Scheme is landowner-led and 'the Scheme tries to reshape the landscape to suit the scheme and not create a scheme that fits the landscape' Norfolk Wildlife Trust.

That is not a good enough reason.

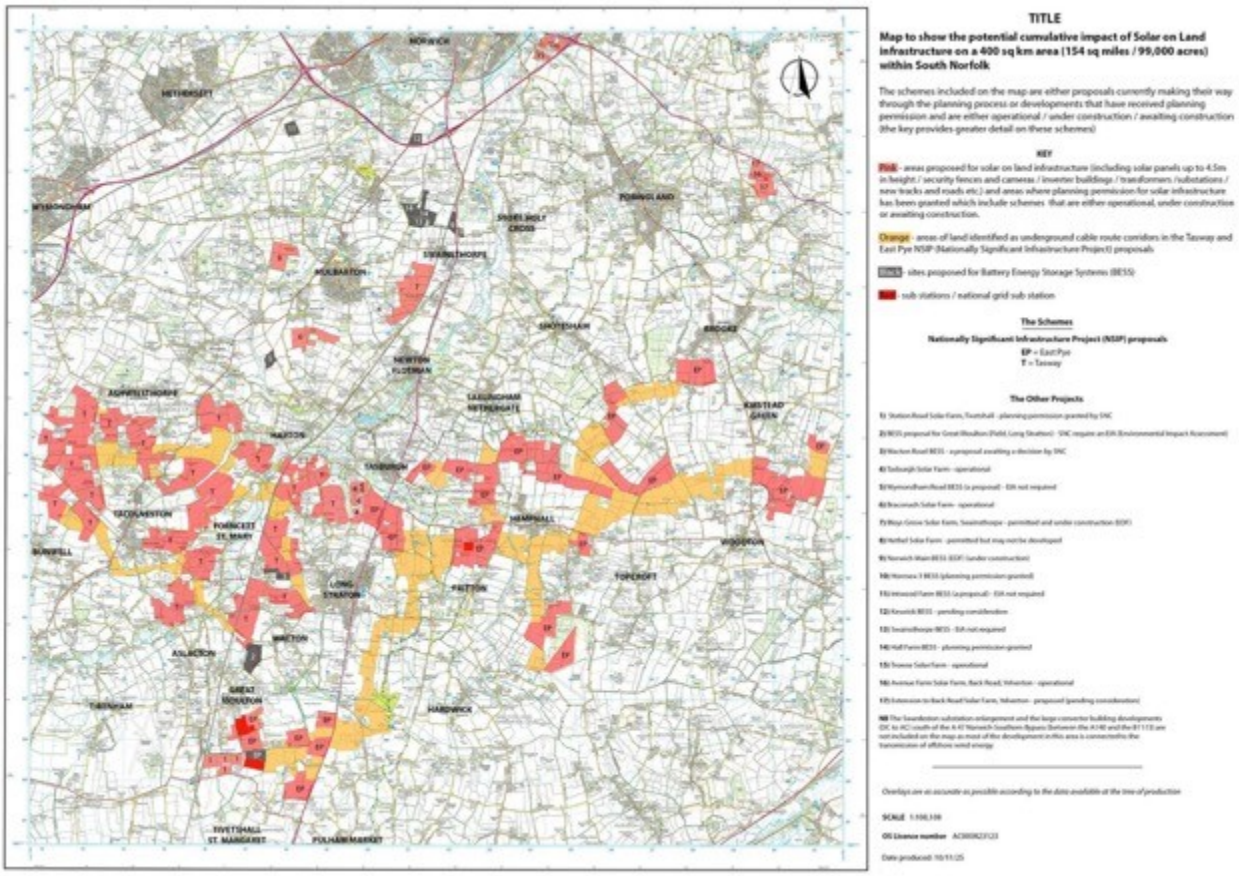
19.1 Other near-by developments (solar, housing, energy infrastructure)

Other industrial renewable energy projects either in construction, in planning or scoping.

- **Bloys Grove** (50MW) is 200 acres and located approximately 3km north of East Pye Solar in **Mulbarton** and is providing 15% Network Rail's annual non-traction electricity demand (stations, offices, depots and maintenance facilities rather than train traction power). Developed by EDF Renewables.
- **Stoke Road** is now in consultation to expand to another 200 acres on BMV 2 land also bordering the River Tas and within a Flood Zone 3
- Swainesthorpe BESS - EDF Renewables 114MW located between Dunstan and Swainesthorpe near Bloys Grove

- **Hall Farm Solar, Tasburgh** butts up to East Pye Solar, Plot 4A on the west boundary and is a 15MW solar infrastructure acquired by BlackRock from SPI China in 2016. It covers approximately 74 acres and was connected to the grid in 2015. It has a licence for 20 years.
- **Tasway Solar -** a 3200 acres proposal which is currently paused with a Gate 1 connection and waiting to see the outcome of East Pye Solar.

Tasway plans to use East Pye Solar infrastructure even though East Pye state their infrastructure is for themselves alone. Tasway will meet East Pye Solar to the east of Hall Farm Solar if consent is given. This will give a cumulative impact of in excess of 6000 acres of solar plus cabling across approx 65 square kilometres of South Norfolk, east to west. That is the same size as Greater London.



- **The Droves - NSIP** Island Green Power 500MW in Mid Norfolk and DCO with the PINS
- **High Grove Solar - NSIP** 500MW in planning
- **EcoPower Suffolk Solar - NSIP** 250MW, 2,200acres, consultation stage
- **Gissing solar project—NSIP** is currently in its early exploration stages and is expected to be the **largest solar farm in the UK** if it proceeds.
    - **Generation Capacity: 900 megawatts (MW)**
    - **Physical Acreage: 5,000 acres** (approximately 2,020 hectares).
    - **General Location:** land between **Long Stratton and Diss** in South Norfolk.
    - **Developers:** The project is being explored by **RPC (Renewable Power Capital)** and **Elmya Energy**.
- **Long Stratton Solar park** - **NSIP**, scoping across the region
- **Trowse Solar Farm 1** - (or Trowse Newton Solar Park). Developed by Island Green Power and operational since 2016, has a capacity of 5MW and covers an area of 117 acres. It's located on the Norwich Southern Bypass
- **Trowse 2** is 7MW and has been operational since 2022 as an extension to Trowse 1
- **Dunston Battery Store -** or the **Electric Land BESS**. **Capacity:** Originally planned for **130MW**, the project was upgraded in March 2025 to a potential **255MW** capacity due to technological advances.**Location:** A **5.1-acre** site on Stoke Lane, directly adjacent to the

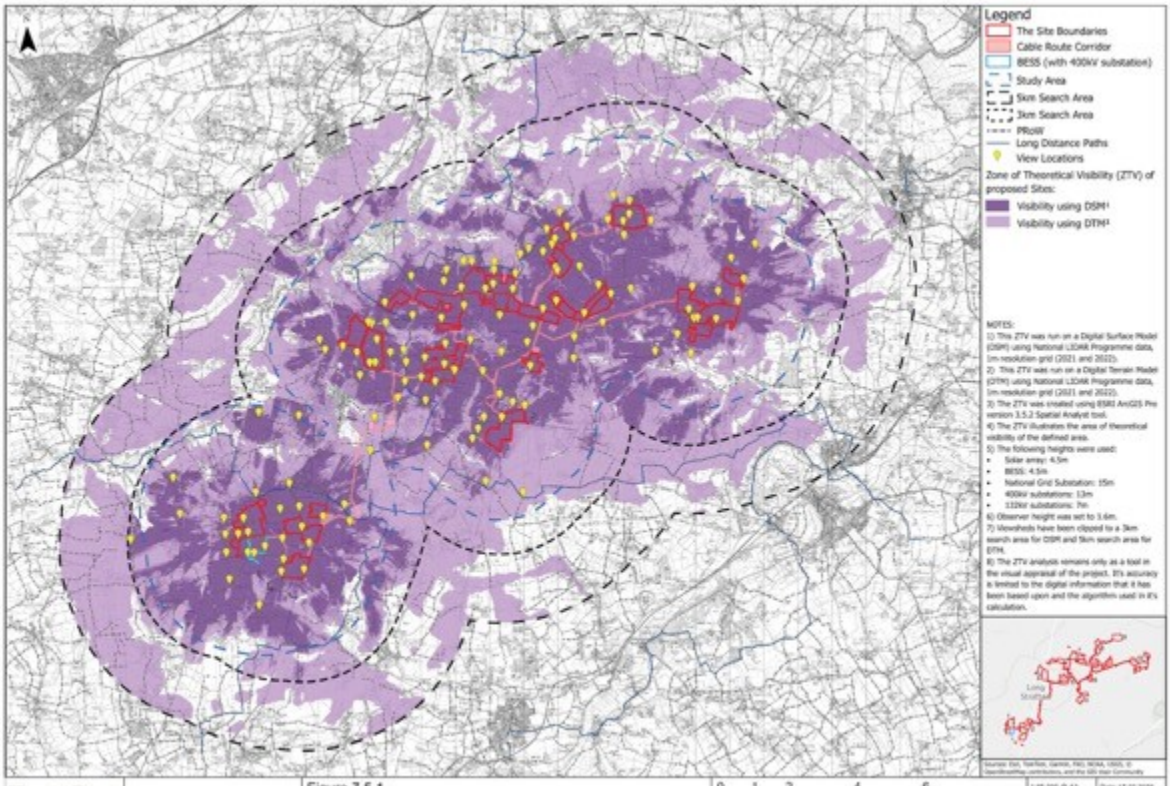
Dunston Hall hotel and golf club, just off the **A140** south of Norwich near Swainesthorpe BESS.

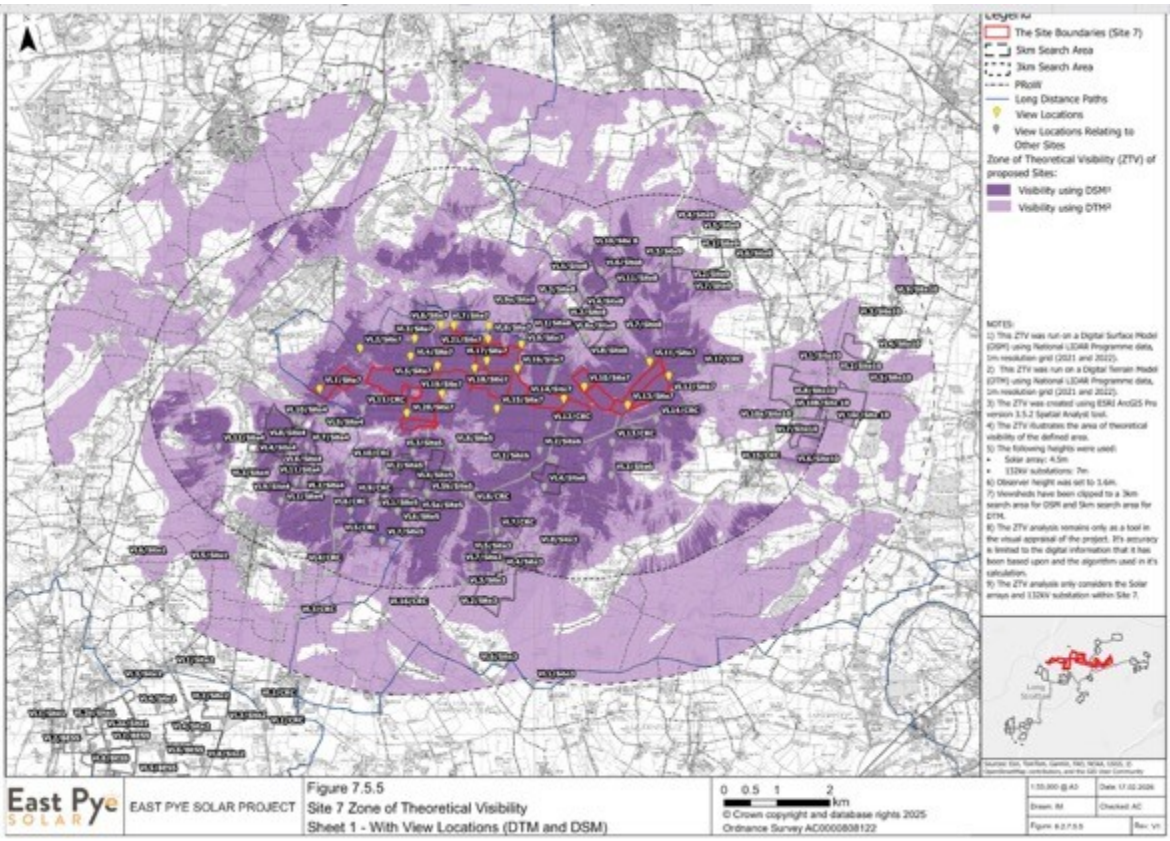
- **Dickleburgh, South Norfolk** - 49.9MW on 182 acres near Pulham Market, consultation stage
- **Long Stratton BESS, South Norfolk** - 700m west of Long Stratton, permission granted early 2026 but only has Gate 1 connection;
- **FIELD BESS** - South of Wacton, north of Great Moulton, in planning;
- **Bracon Ash, South Norfolk** - 28.5MW
- **Grange Farm Solar, Palgrave, Suffolk** - 30MW
- **Marsh Lane Solar, Palgrave, Suffolk** - 30MW, 123 acres

19.2 Cumulative impact on landscape and visual

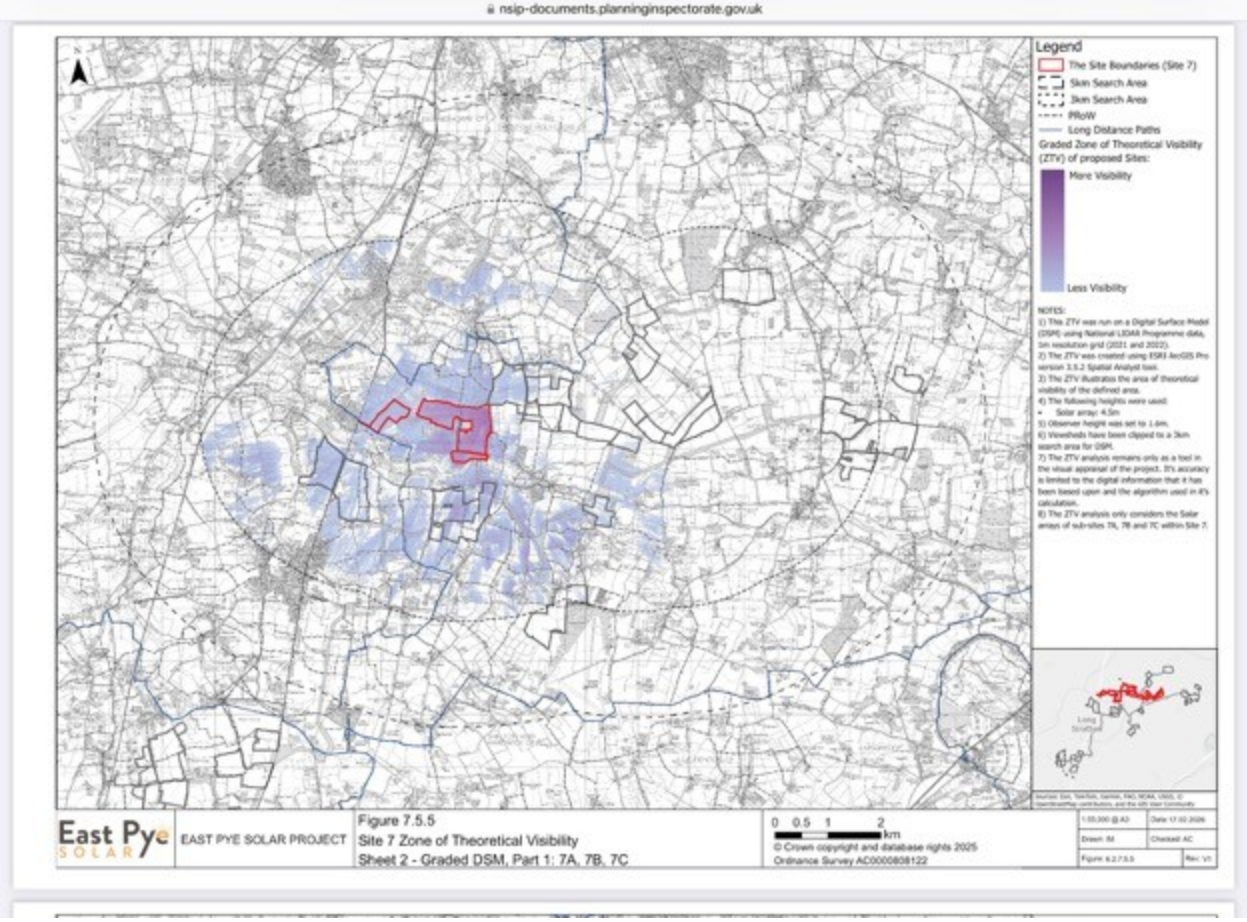
East Pye Solar's own diagrams show that the impact of the development on the surrounding landscape and the visibility is hugely detrimental not just to those in close proximity but to much further afield.

The maps only show up to 5km diameter however we know that it doesn't just stop there. For example Bloys Grove, Mulbarton can be clearly seen from a road over 3km to the east of the scheme so we know it would be still visible from at least 5km away with the landscape allowing.


Legend
The Site Boundaries
Cable Route Corridor
BESS (with 400kV substation)
Study Area
5km Search Area
3km Search Area
PRoW
Long Distance Paths
View Locations
Zone of Theoretical Visibility (ZTV) of proposed Sites:
Visibility using DSM¹
Visibility using DTM²
NOTES:
1) This ZTV was run on a Digital Surface Model (DSM) using National LiDAR Programme data, 1m resolution grid (2021 and 2022).
2) This ZTV was run on a Digital Terrain Model (DTM) using National LiDAR Programme data, 1m resolution grid (2021 and 2022).
3) The ZTV was created using ESRI ArcGIS Pro version 3.5.2 Spatial Analyst tool.
4) The ZTV illustrates the area of theoretical visibility of the defined area.
5) The following heights were used:
• Solar array: 4.5m
• BESS: 4.5m
• National Grid Substation: 15m
• 400kV substations: 13m
• 132kV substations: 7m
6) Observer height was set to 1.6m.
7) Viewsheds have been clipped to a 3km search area for OSPR and 5km search area for DTM.
8) The ZTV analysis remains only as a tool in the visual appraisal of the project. It's accuracy is limited to the digital information that it has been based upon and the algorithm used in it's calculation.
East Pye SOLAR
EAST PYE SOLAR PROJECT
Figure 7.5.1
Zone of Theoretical Visibility with View Locations
0 1 2 4 6 km
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The Site Boundaries (Site 7)
5km Search Area
3km Search Area
PRoW
Long Distance Paths
View Locations
View Locations Relating to Other Sites
Zone of Theoretical Visibility (ZTV) of proposed Sites:
Visibility using DSM¹
Visibility using DTM²
NOTES:
1) This ZTV was run on a Digital Surface Model (DSM) using National LiDAR Programme data, 1m resolution grid (2021 and 2022).
2) This ZTV was run on a Digital Terrain Model (DTM) using National LiDAR Programme data, 1m resolution grid (2021 and 2022).
3) The ZTV was created using ESRI ArcGIS Pro version 3.5.2 Spatial Analyst tool.
4) The ZTV illustrates the area of theoretical visibility of the defined area.
5) The following heights were used:
• Solar array: 4.5m
• 132kV substations: 7m
6) Observer height was set to 1.6m.
7) Viewsheds have been clipped to a 3km search area for OSPR and 5km search area for DTM.
8) The ZTV analysis remains only as a tool in the visual appraisal of the project. It's accuracy is limited to the digital information that it has been based upon and the algorithm used in it's calculation.
9) The ZTV analysis only considers the Solar areas and 132kV substation within Site 7.
East Pye SOLAR
EAST PYE SOLAR PROJECT
Figure 7.5.5
Site 7 Zone of Theoretical Visibility
Sheet 1 - With View Locations (DTM and DSM)
0 0.5 1 2 km
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Ordnance Survey AC0000808122

Site 7 is visibly detrimental for many miles due to elevated level.



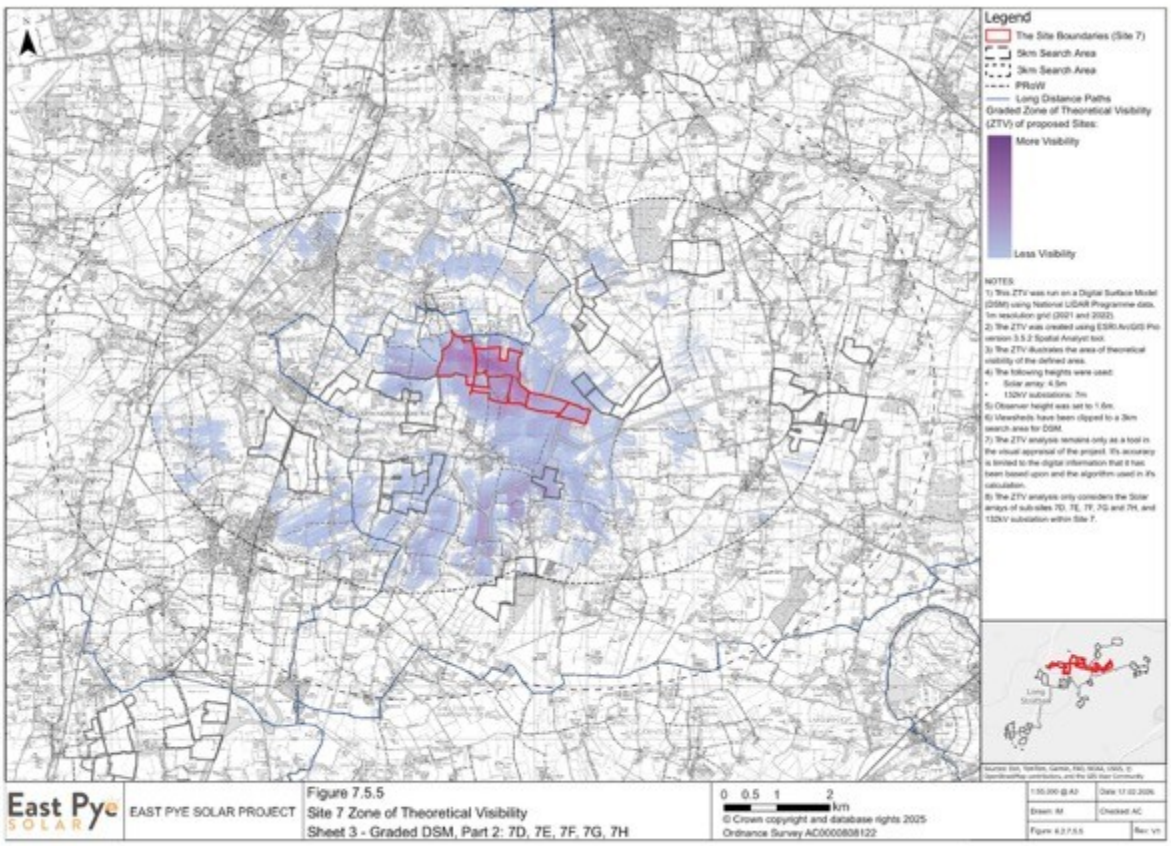
Site 7A, 7B and 7C shows how visible the sites will be especially Site 7C however visibility wasn't considered from the A140 or the homes along the A140 to the west of site 7 which will have a clear and significant view of site 7A and 7C.

Albeit the topography of the land may appear mainly flat, it actually undulates across Site 7 which is also elevated above the Tas valley, making it visually significant but would also make the scheme visible for miles across multiple sites.

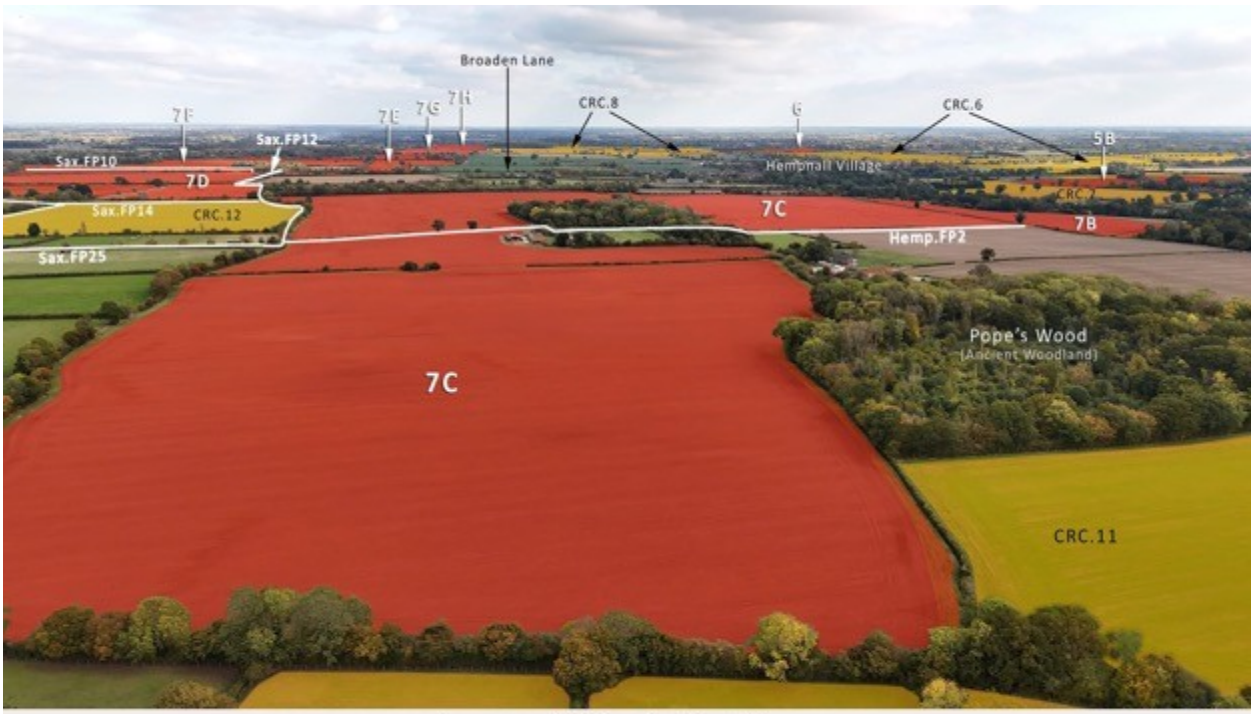
The natural tree lines can't mask the scheme as the panels will appear taller than most existing mature trees that are there and are sporadic. Whilst the screening will take decades to mature and will change the natural character and openness of the landscape.

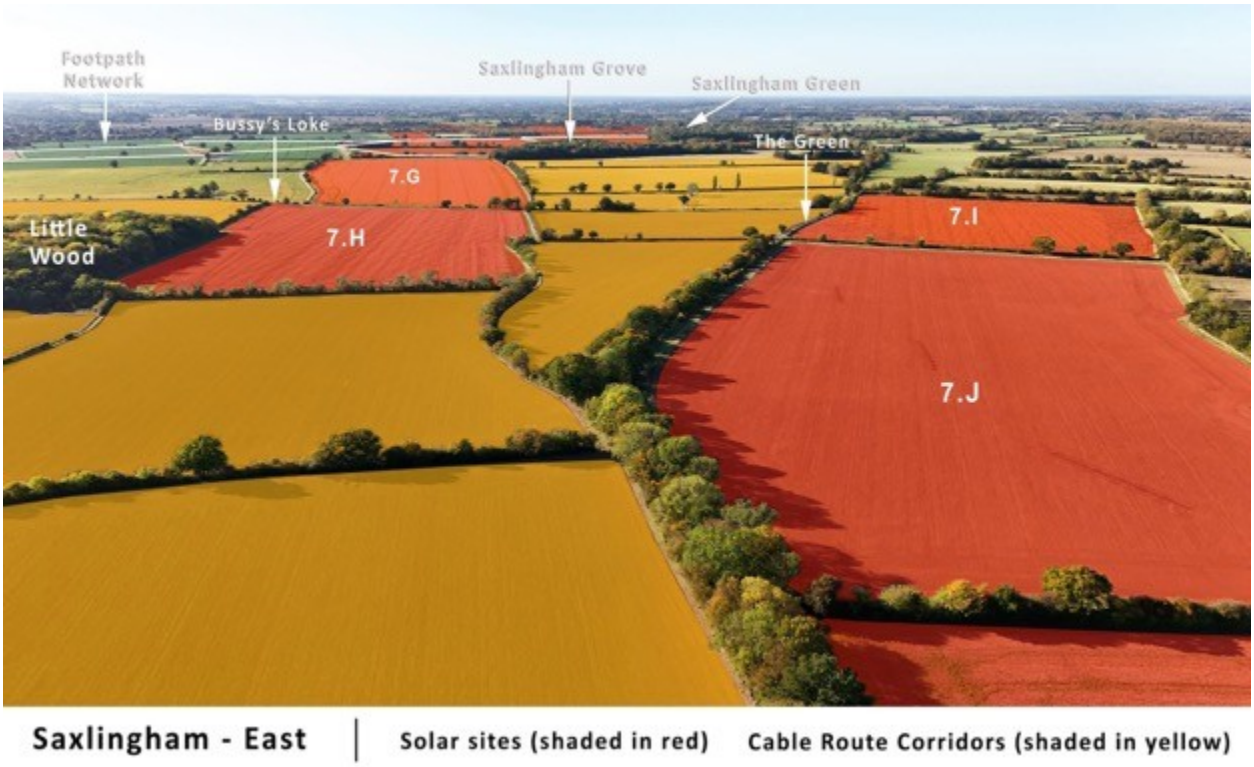

Taken from the Countryman Pub, A140
facing East
7A


View from the A140 looking East
7C


Legend
The Site Boundaries (Site 7)
5km Search Area
3km Search Area
PRoW
Long Distance Paths
Graded Zone of Theoretical Visibility (ZTV) of proposed Sites:
More Visibility
Less Visibility
NOTES:
1) This ZTV was run on a Digital Surface Model (DSM) using National LiDAR Programme data, 1m resolution grid (2021 and 2022).
2) The ZTV was created using ESRI ArcGIS Pro version 3.5.2 Spatial Analyst tool.
3) The ZTV illustrates the area of theoretical visibility of the defined area.
4) The following heights were used:
• Solar array: 4.5m
• 132kV substations: 7m
5) Observer height was set to 1.6m.
6) Viewsheds have been clipped to a 3km search area for DSM.
7) The ZTV analysis remains only as a tool in the visual appraisal of the project. It's accuracy is limited to the digital information that it has been based upon and the algorithm used in it's calculation.
8) The ZTV analysis only considers the Solar arrays of sub-sites 7D, 7E, 7F, 7G and 7H, and 132kV substation within Site 7.
East Pye
SOLAR
EAST PYE SOLAR PROJECT
Figure 7.5.5
Site 7 Zone of Theoretical Visibility
Sheet 3 - Graded DSM, Part 2: 7D, 7E, 7F, 7G, 7H
0 0.5 1 2
km
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Ordnance Survey AC0000808122


Legend
The Site Boundaries (Site 7)
5km Search Area
3km Search Area
PRoW
Long Distance Paths
Graded Zone of Theoretical Visibility (ZTV) of proposed Sites:
More Visibility
Less Visibility
NOTES:
1) This ZTV was run on a Digital Surface Model (DSM) using National LiDAR Programme data, 1m resolution grid (2021 and 2022).
2) The ZTV was created using ESRI ArcGIS Pro version 3.5.2 Spatial Analyst tool.
3) The ZTV illustrates the area of theoretical visibility of the defined area.
4) The following heights were used:
• Solar array: 4.5m
5) Observer height was set to 1.8m.
6) Viewsheds have been clipped to a 3km search area for DSM.
7) The ZTV analysis remains only as a tool in the visual appraisal of the project. It's accuracy is limited to the digital information that it has been based upon and the algorithm used in it's calculation.
8) The ZTV analysis only considers the Solar arrays of sub-sites 7I, 7J, 7K and 7L within Site 7.
East Pye SOLAR
EAST PYE SOLAR PROJECT
Figure 7.5.5
Site 7 Zone of Theoretical Visibility
Sheet 4 - Graded DSM, Part 3: 7I, 7J, 7K, 7L
0 0.5 1 2
km
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Cumulative impact of this land parcel with cable corridors

19.3 Cumulative impact on ecology

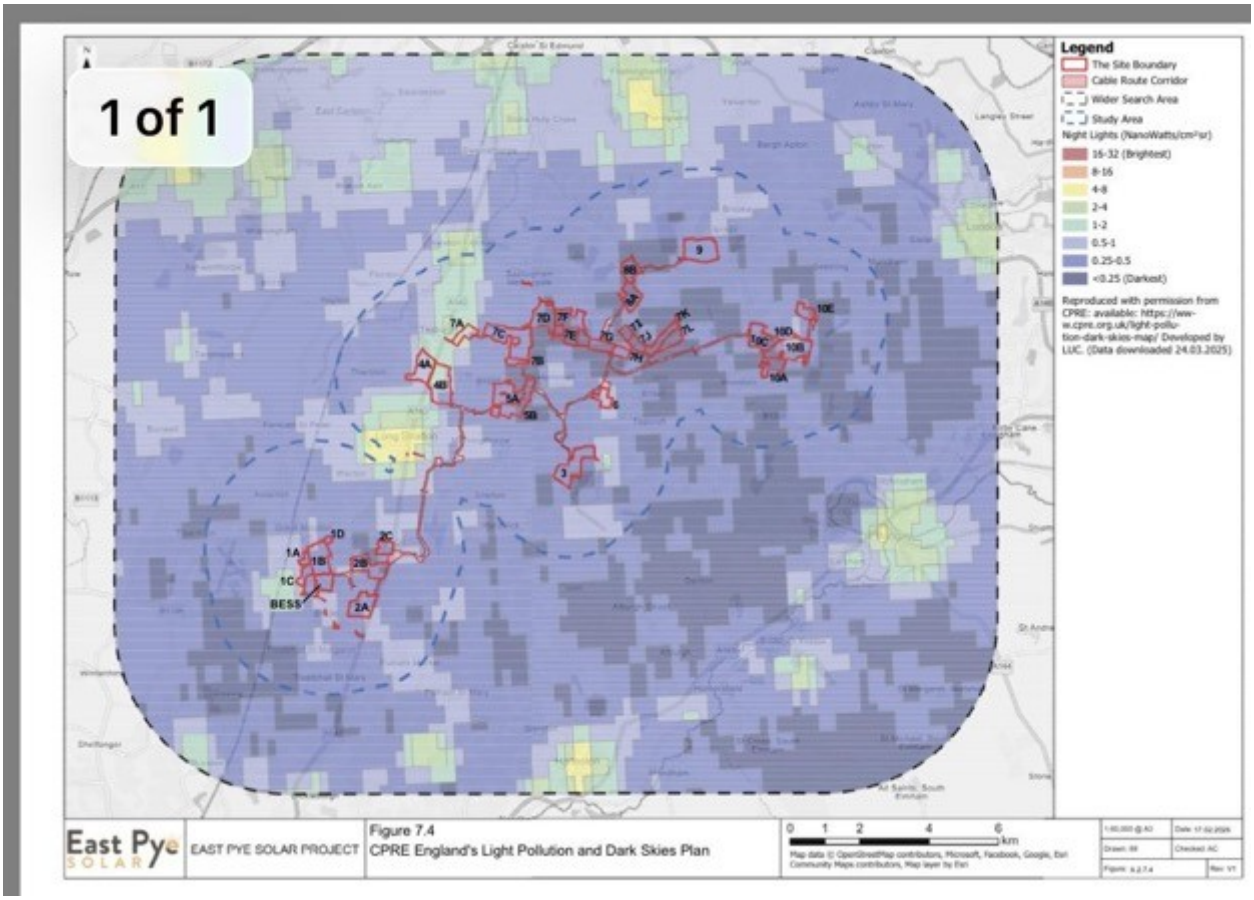
The current ecology surveys provided by East Pye Solar are not complete enough to allow full examination and further surveys are essential.

The information surrounding haul roads, compounds and road widening of narrow lanes is misleading in particular towards the impact on mature hedges and trees.

The cumulative impact of the Scheme represents a significant change to this landscape and its habitats by causing disruption and increasing fragmentation of Sites; none of which can be adequately mitigated for.

Lighting of compounds and construction sites, trenching works and increased vehicle movements, especially of heavy vehicles are of particular concern and spread across a wide swathe of the Claylands.

Lighting on compounds and for night working is in conflict with the need to protect this Dark Skies area. Dark Skies areas are shown to have a benefit for human health as well as wildlife.



The Claylands landscape is of high value for people and wildlife because it is a small-scale area of ancient countryside with pre-enclosure patterns of tall, old hedges, small wood and irregular fields.

East Pye Solar is out of scale with this initiate landscape and represents industrialisation of this very rural area. It is out of character and alien.

Redesigning the Claylands landscape, at scale, for solar industrialisation is not acceptable. A scheme should be designed to fit a landscape and bring a range of benefits for the people and wildlife that live in the area. It should not be to benefit private profit.

The South Norfolk Claylands has been the focus of nature conservation efforts specifically on the high occurrence of good quality habitat (ancient woodlands, open commons, mature hedges and trees) within the landscape.

This scheme carries unacceptable and long-term impact on ecology and on the rural landscape valued for its tranquility.

As the Scheme is not needed under UK Government Clean Energy Action Plan the impacts outweighs and benefits.

Removal of significant hedgerows and trees for access points, haul roads and to improve visibility is considered ‘insignificant’ across the documents. Replacing mature habitats with immature planting, that will take decades to grow as well as change the nature of the landscape itself. It is unacceptable and damaging to the natural ecology of the area.

The impacts need to be assessed as not just immediate loss of habitat in that place, but on how they are used as connectivity for species across the landscape. This latter point is a legal requirement within the Core Sustenance Zones for Barbestrelle bats and also needs to consider the Favourable Condition Status for both bats and hedgehogs.

Of special concern is the impact on Barbestrelle bats. The area lies within the Core Sustenance Zone of a number of interconnecting colonies (Norfolk Barbestrelle Study Group). Barbestrelle are especially prone to disruption from noise and lighting, and as it stands, the proposal gives grave concern for the bats’ future in the landscape should the Scheme proceed.
It is worth noting that Barbestrelles are present because this is a quiet area of small woods, mature trees, open grasslands, ponds, hedgerows and minimal lighting or disturbance. A Natural England licence will be needed for work in the vicinity of the barbestrelle roosts identified by the Norfolk Barbestrelle Study Group, and this is not clear in the application as it stands.

The solar scheme impacts several County Wildlife Sites and Sites of Special Scientific Interest, including Crow Green, Wood Green and Tyrrel’s Wood, Spring Wood, Krons Meadows plus Brooke-Saxlingham woodland cluster and sites along the Hempnall Beck. Local ecologists

consider this a landscape of irreplaceable habitats that are well connected by hedges and field margins, and which are well-buffered from impacts of noise, lighting and traffic.

Many haul routes and access points will damage designated Roadside Nature Reserves (RNR) including on Parker's Lane and Wood Lane as well as at the BESS site on Lodge Lane, Great Moulton to name a few. All have locally significant wildlife which are under threat including sites with the nationally scarce sulphur clover. These verges represent possibly the last, best fragments of lowland meadow in the Claylands. Lowland meadow is an irreplaceable habitat which has suffered a catastrophic loss in the Claylands since World War II (Countryside Commission figures, 1984 puts the loss at almost 98%).

As all the green lanes and Roadside Nature Reserves are often under recorded yet botanically rich. A full botanical survey should be carried out on all hedges and road side verges that are subject to alternation or on a major haul route for East Pye Solar. East Pye Solar has failed to do so.

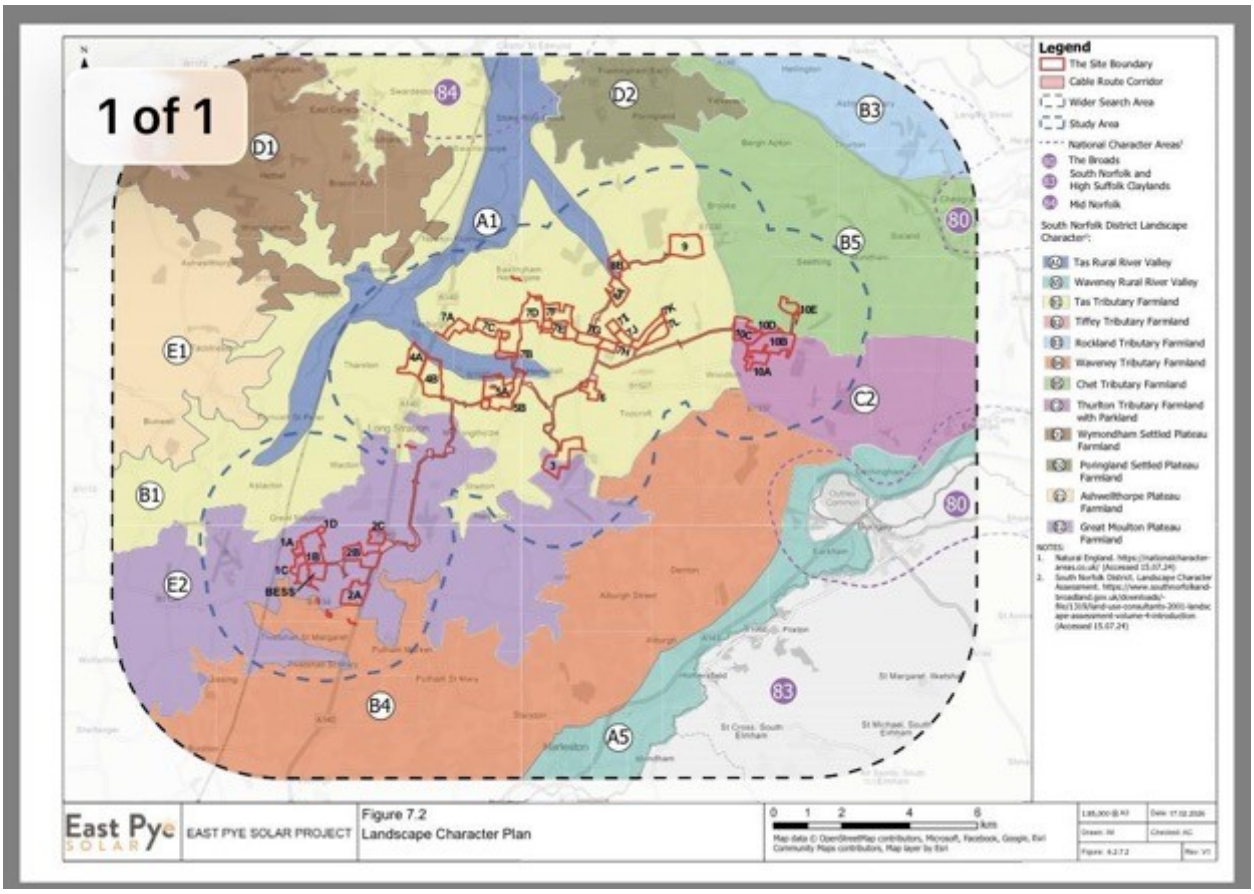
The crossings and disruption of the Hempnall Beck, near the Krons is considered of 'grave concern' by local ecologists. The stream runs into the River Tas, a chalk stream; pollution or changes to hydrology will be detrimental to the chalk stream, which is supporting White Clawed Crayfish. East Pye Solar have ignored the evidence from Norfolk Rivers Trust of the presence of white Clawed crayfish in the river Tas and within 2km from several sites including Site 7.

Other protected or threatened species in the area include hedgehog, yellowhammer, brown hare, badger, serotonin bats and a wide range of other bats, skylarks, linnets, bullfinch plus turtle dove (that breed annually at Wood Green), and other farmland birds. The loss of hedgerows and mature trees and the construction of the haulage roads, particularly on CRC4 and across Site 7, and construction noise, will have an impact on these species.

Even if the fields with the solar panels are designed to deliver a biodiversity uplift, the extent of construction for haul roads and cabling across the landscape will have a significant impact for wildlife.
Existing research shows that 6 out of 8 species of bat can be negatively impacted by solar schemes; this is especially high for those that use underground bat hibernacular, such as those within the County wildlife Site at Spring Wood.

Conclusion
The Scheme will be detrimental across the area to biodiversity, protected species, ecology and the ancient natural landscape of the Claylands.
Lack of seasonal surveys demonstrates the lack of care and attention that would be given to this very special and nature-rich area and presents a cumulative risk and impact across this sensitive area from this Scheme.

The cumulative risk is a material consideration under the NSIP regime and NPPF requirements to consider impact to ecology and it cannot be adequately addressed by project-specific mitigation alone.



19.3 Cumulative impact on heritage

East Pye Solar will impact heritage assets across the scheme including Conservation Areas and listed properties.

In excess of 300 Grade I, Grade II* and Grade II listed properties will be affected through the impact on the setting of these heritage assets, and causing industrial-scale visual changes.

East Pye documents consider the impact to be generally low and 'not significant' yet also state many heritage assets would experience *'some degree*' of change to their setting. That is not insignificant.

When something that is out of character and 'alien' is placed within 100m of a listed building, impact is going to be more significant than East Pye Solar are stating.

Just placing industrialisation within this significant ancient area of Claylands with centuries of agricultural heritage will be detrimental and harmful. Permanently changing the area to suit a scheme, and for private profit, is unacceptable.

When considering East Pye with other major infrastructure projects in South Norfolk, including solar schemes and transport projects such as the Long Stratton bypass, a combined impact concerns are raised:

- Combined effects on the setting of listed timber-framed clay lump buildings;
- Industrialisation of historic rural landscapes surrounding villages;
- The possibility that new planting would take decades to mature and screen infrastructure;
- Out of character screening alone would change the character of openness and this ancient rural environment;
- Cumulative interaction with multiple large energy projects proposed across South Norfolk;
- Loss of agricultural heritage with the conversion of farmland which risks destroying the tangible, historic and functional link between the communities and their agricultural past

The cumulative risk is a material consideration under the NSIP regime and NPPF requirements to consider impact to heritage, and it cannot be adequately addressed by project-specific mitigation alone.

19.4 Cumulative impact on Transport and Traffic

Introducing of such a large scale industrial project in this specific rural location raised significant concerns regarding:

- Cumulative traffic impacts;
- The capacity of narrow country lanes to manage heavy construction vehicles as well as additional construction worker traffic;
- Wear and tear to narrow lanes and roads not designed or structured for such HGVs and AILs;
- Road widening to accommodate oversized vehicles on roads not intended for them will change the character of the area;
- Proximity of some Sites, for example, sub-sites 4A and 4B and Site 5, to major transport routes of the A140 or B1527 as well as key junctions, like the Hempnall roundabout, the Krons crossroads en route to Site 7;

- Manoeuvring large AIL and heavy haulage through Conservation Villages like Saxlingham Nethergate and Hempnall that put vulnerable properties and structures at risk of damage or destruction. Listed properties, vulnerable homes of timber frames and clay-lump constructions, homes with minimal or no foundations, walls and property boundaries, structures like the war memorial are highlighted on Section 56 if considered 'in the way';
- Road closures causing delay as well as cutting off communities from going about their daily life;
- National Highways highlighted concerns on junctions including that of the A47 with A140 which East Pye Solar has not surveyed nor assessed;
- Norfolk County Council have indicated they do not want access to sites from an 'A road' or anything less than a 'B road'. Yet East Pye Solar has created a transport and access plan that includes access from the A140 as well as small, single-track lanes that are 'C-roads'.

East Pye Solar are focusing their HGV routes on A140, B1527 and B1332. These are all main link routes across the local area allowing the traffic to disperse without major impact to small local lanes.
The **cumulative effects** of the East Pye Solar project, particularly when combined with the A140 **Long Stratton Bypass,** which is a major haul route north to south could lead to significant traffic pressure in the area.

The peak daily HGV movements, especially if they coincide with other local developments including the Long Stratton Neighbourhood expansion plan, will increase congestion.
The A140 and the bypass is a two way road that often experiences road closures from highway maintenance and accidents. This has an immense impact on narrow single track lanes in the surrounding area and unplanned closures generally brings the whole area to gridlock.
The local road network, while benefiting from the new bypass and the Hempnall roundabout, may struggle with the increased volume of heavy vehicles, particularly in the vicinity of Hempnall, Long Stratton and Great Moulton.

The current planning documents for the Scheme indicate that during the construction. Phase the expected HGV traffic is:

- Average daily HGV arrivals: 47 HGV a day
- Average daily HGV movements (arrivals and departures): 95 HGVs per day
- Peak Daily HGV arrivals: 69 HGVs per day
- Peak Daily HGV Movements: 138 two-way movements a day

Although the 'peak' figures would only occur at limited periods the impact will be significant.

The A140 is a major haul road north to south and is considered one of the main access routes across the scheme. With the A140S-B1527 exceeding the IEMA EATM guideline threshold of more than 10% on the flow increase of links with receptors of High Sensitivity (Long Stratton), the transport route for Sub-sites 2A, 2B, 2C, CRC3 and CRC4

needs rethinking. This is a major flaw, demonstrating lack of surveys and submitting plans too early without fundamental accuracy to the documents.
It also demonstrates the disconnect on the southern cluster from the north of the scheme.

The final details of the AILs haven't been completed but the impact to the A140 will be very significant and will have a major impact across the region.
National Highways state that the use of the A140 is not used as an AIL route due to the concerns of the weight limits on various bridges proposed for the route and raise particular concern to the junctions rather than the roads themselves in particular the junction of the A47 with A140.

The cumulative risk is a material consideration under the NSIP regime and NPPF requirements to consider impact to transport and traffic, and it cannot be adequately addressed by project-specific mitigation alone.

19.5 Cumulative impact of Noise and Vibrations

The proposed development of these sites indicates the following anticipated cumulative effects on noise and vibration which hasn't been properly addressed by East Pye Solar.

Construction Phase Impacts: Significant noise and vibration are expected, primarily from pile driving for solar arrays, construction noise as well as the movement of heavy machinery and HGV movement.

No consideration is given to residential amenity and the rural background noise levels including to multiple listed buildings within close proximity to sites across the scheme that are of sensitive construction like timber-framed clay lump houses and Grade I listed churches.

The construction phase is expected to last at least 24months, with potential for cumulative noise if multiple parcels are constructed simultaneously or in close proximity.

Lower background noise: Noise seems noticeably louder in rural areas even if the sound level meter would measure the same number of decibels. This is due to lower background (ambient) noise. Less constant sounds that create a 'noise floor' making any sound more significant and appear nearer and/or louder.

Less sound masking: A person's hearing is very sensitive to change in sound. A noise that rises 20dB above the background noise is more attention-grabbing than one that rises only 5dB above it even if the actual sound hasn't changed. Where the baseline starts lower, the noise will appear louder.

Sound travels further: Rural areas offer fewer buildings and obstacles to block or scatter sound allowing sound to propagate over greater distances. Some weather conditions like cool, still nights

allow sound to travel even further and seem unusually clear. With South Norfolk being predominately flat or only slightly undulating, sound travels greater distance.

Human perception: rural environments are significantly quieter than urban ones so sudden noises can feel more intrusive because the contract between silence and sound is much greater.

Operational Noise: While solar panels are considered silent, the operation of inverters, transformers, and Battery Energy Storage Systems (BESS) within the site will generate low-level, consistent noise. The cumulative impact would be the combined noise of this equipment at the closest receptors.

As no consideration has again been given to residential amenity and rural background levels, this will be detrimental and debilitating.

Transport and Access: Cumulative noise effects are expected due to increased construction traffic on the local road network.

Maintenance Noise: weekly maintenance vehicles and the tankers used for washing the panels will sound intrusive within the rural environment.

Replacement Noise: replacement of panels and BESS will be the same as construction noise and will be considerable within the rural environment and lasting up to 2 years.

Decommissioning Noise: this will similar to construction and will impact for at least 2 years causing.

Conclusion: no consideration has been given to how the Scheme's noise will impact the quiet rural environment and is considered 'not significant', nor considers impact within a rural impact.

The cumulative risk is a material consideration under the NSIP regime and NPPF requirements to consider impact to noise and vibrations, and it cannot be adequately addressed by project-specific mitigation alone.

19.6 Cumulative impact on air quality

Construction Dust and Emissions: The construction of multiple sites across the region creates potential for cumulative air quality. This includes dust soiling and increased PM10 concentrations, particularly for sensitive receptors within 350m of a site or 50m of transport routes. This will effect multiple listed buildings including Grade I Listed places of worship and many buildings of sensitive construction.

Construction Traffic: The project is expected to generate Heavy Duty Vehicle (HDV) movements that could impact local air quality, necessitating an assessment of how these movements interact with traffic from other local developments, such as housing in Long Stratton.

Haulage routes including the A140 alongside Long Stratton and proposed as the main north/south route as well as B1527 as the main east/west route through Hempnall will have impact on local air quality with increased daily numbers of HGVs and other site vehicles.

If a fire were to occur at the Battery Energy Storage System (BESS) located at Great Moulton, the primary air quality concern would be the release of a **toxic smoke plume** containing hazardous gases and particulates.

The cumulative risk is a material consideration under the NSIP regime and NPPF requirements to consider impact to air quality, and it cannot be adequately addressed by project-specific mitigation alone.

19.7 Cumulative socio-economic impact

The cumulative socioeconomic effects of the proposed East Pye Solar scheme will be significant on a local level even though East Pye Solar considers the impact to be of national benefit.

- **Loss of BMV agricultural land** from conventional production forever as the land will degrade;
- **No decommissioning bond to restore** the land to pre-scheme quality;
- **Land is due to be compulsory acquired** so the land will not be owned by pre-scheme landowners. It is unclear what East Pye Solar, or whoever owns the scheme at decommissioning, will do with the land once the scheme ends;
- **Loss of agricultural jobs** due to mass loss of land permanently in one area directly, due to less land to farm, as well as indirectly through reduced supply chain demand;
- **Agricultural jobs will be less desirable** due to loss of value put on the farming sector and growing quality, local food;
- **No permanent on-site jobs will be created** once the Scheme is in operation (East Pye Solar);
- **Jobs for construction will be recruited externally** and shipped in and out;
- **Permanent visual change to the rural landscape** over a substantial area altering the character of this ancient landscape through industrialisation forever;
- **Tourism** is Norfolk's largest economic sector bringing in £5.9 billion and employing 54,000 people. Add that to the hospitality industry and the added attractions in and around Norwich, which has just been voted Sunday Times Best Place to live in the UK 2026, East Pye Solar will have a major detrimental and financial loss on local and county-wide tourism;
- **Small, independent tourist attractions** or those businesses that rely heavily on visitors to boost local numbers during the holiday season will see a loss including holiday lets;
- **County-wide tourism** will see a loss as the A140 through Long Stratton is the major tourist route to the Norfolk Broads and the ‘tunnel of panels’ at Long Stratton will change the beauty of Norfolk. Add that to the cumulative impact of further schemes that are already scoping and waiting to utilise East Pye Solar infrastructure. The knock on effect is massive;

- **Pressure on rural roads** and the local network that local residents rely on to go about their daily life;
- **Closing PRoW** long term during the construction of the scheme will prevent people using them for leisure and as a practical route to reach the facilities of Long Stratton;
- **Changing the nature of PRoW** when reopened will ruin a quiet country walk to one of enclosure and industrialisation. Screening will take decades to hide fencing and panels but will also change the character of an area from openness to one of enclosure;
- **Marketability Issues:** A study by the University of Birmingham suggests a typical **5.4% reduction** in relative prices for properties within 750m of large solar scheme. Homes are already unsalable in negative equity or are falling through as plans are appearing on searches. Who would want to live in an area surrounded by industrialisation?;
- **Increase in house insurance** due to perceived flood and safety risks. Already happening;
- **Lack of Compensation:** Currently, there is **no statutory compensation** for residents who suffer a loss in property value or business income due to the proximity of an NSIP project, unless their land is physically acquired;
- **Infrastructure & Maintenance:** Concerns have been raised by Norfolk CPRE that the "industrialisation" of the countryside will require long-term public spending on road repairs due to heavy construction traffic without guaranteed local tax benefits
- Impact cost to local fire service that are all 'on-call' would mean additional personnel costs and specialised equipment would be required to be prepared for BESS fires and infrastructure disasters. This cost would impact local residents council tax.

Conclusion: The impacts fall disproportionately on local residents and the County while most of the perceived energy benefits will be distributed nationally whilst profit will be private.

South Norfolk will be an energy industrialised area for the rest of the UK, changing the nature of the area from rural to industrialised forever and opening the door for further industrialisation whilst large global invest banks make vast private profits for shareholders.

The cumulative risk is a material consideration under the NSIP regime and NPPF requirements to consider impact to socio-economic impact, and it cannot be adequately addressed by project-specific mitigation alone.

19.8 Cumulative impact to soils and agriculture

81% of the land proposed for East Pye Solar Sites is BMV Grade 1-3a. In addition to that is the cabling corridor which is also mainly of BMV Grade 1-3a (although never assessed by East Pye Solar).

The land will be removed from production for 60 years of the scheme as well as construction and decommissioning.

With no decommissioning bond to insist the land would be restored to at least its previous quality, the land will degrade and left at it's post-scheme quality. East Pye Solar state that the soil will degrade.

Potential cumulative effects include:

- **Reduced local production** of cereals, oilseed rape, sugar beet and other crops will impact supply changing;
- **Reduced flexibility** for local farming businesses;
- **Fragmentation of farm holding** making field operations less efficient especially during construction on the cable route corridor which will have fields dissected diagonally or down the middle;
- **Compulsory purchased land** will be removed from agriculture permanently;
- **Cabling Route** land will be removed from production for 2 years and will require several years to recover reducing productivity;
- **Potential impacts on local agricultural supply chains** if multiple projects affect the same area;
- **Soil Compaction and Structural Damage:** Construction, operation (maintenance traffic), and decommissioning phases will result in deep soil compaction, which can take many years to recover from;
- **Soil Erosion and Runoff:** The panels can create runoff that leads to soil loss through erosion;
- **Ecological and Agricultural Management** for Sites will be for convenience and ease of management rather than to encourage biodiversity gain;

Conclusion: The project's scoping report notes that while individual, smaller projects might not seem significant, the cumulative, regional, and national loss of soil resources and agricultural land from projects like East Pye contributes to a larger, long-term impact on the farming industry.
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The cumulative risk is a material consideration under the NSIP regime and NPPF requirements to consider impact to soil and agriculture, and it cannot be adequately addressed by project-specific mitigation alone.

19.9 Cumulative impact to ground conditions

The cumulative impact on ground conditions from industrialised solar schemes when assessing across the lifetime of the 60 year scheme - from construction, through operation, replacement, to decommissioning.

The main cumulative impacts include:

Soil Compaction:

- Generally the greatest concern
- Compaction from heavy construction vehicles and cranes;
- Reduced soil porosity;
- Restricted root growth;
- Reduced infiltration of rainfall;
- Increased surface runoff and localised waterlogging.

If construction coincides with wet conditions compaction can extend well below the topsoil and may take years to recover.

Soil Structure and fertility:

Repeated disturbance from:

- Cable trenching;
- pile driving;
- access track compaction;
- substation foundations;
- BESS construction

All can alter soil horizons and reduce the quality of agricultural soils if reinstatement is poor. The BESS and Substations wont be reinstated.

With the large quantities of BMV land affected, cumulative disturbance across multiple projects could reduce the availability of high-quality agricultural soils for decades.

Erosion:

Construction exposes bare ground, increasing susceptibility to wind erosion, water erosion and sediment movement into nearby watercourses.

Drainage and hydrology:

Large solar schemes can cumulatively alter natural drainage patterns, infiltration rates, overland flow paths and local flood behaviour.

Although panels occupy only part of the land surface, concentrated runoff from panel edges can create localised erosion or ponding if drainage is not well designed.

East Pye have failed to properly assessed the drainage and runoff effects especially in close proximity to the river Tas as well as the area of Long Stratton that flood or is at risk of flooding annually.

Soil biology:

Although there is a belief that a solar scheme can have benefits to the soil biology there is no evidence to support improved biology over a 60 year timeline as it hasn't ever happened.

Industrial solar and infrastructure is very different from resting soil in a private scheme managed by the landowner that has a vested interest to protect the soil and get the best out of it.

Industrial solar is more likely to have a negative impact due to soil compaction, disturbance during installation and altered soil moisture beneath dense panel arrays.

Contamination risks:

Ground condition will be affected by accidental fuel or oil spills during construction, transformer oils, concrete washout, wheel washing, and disposal of damaged equipment.

Risk management is only as good as the person responsible and the company behind it. We have seen what happened to Thames Water and what is still happening to the rivers due to lack of maintenance and responsibility.

Post Decommissioning:

Even if soil is not permanently degraded or no decommissioning bond for soil restoration is in place, ground conditions can affect ease of cultivation after decommissioning, drainage performance especially across the clay soil within the area of East Pye Solar scheme, crop yields will be reduced as soil is less performing and machinery access could be harder due to structure of soil.

Conclusion: The real question for BMV grade 1-3a land is whether soils can realistically be restored to their original agricultural capability after 60 years? There is no evidence to say they can.

The potential long-term effects on agricultural soil quality and capability particularly where extensive areas of BMV are involved, and the extent to which multiple projects affect the same locality, cannot be mitigated against.

The cumulative risk is a material consideration under the NSIP regime and NPPF requirements to consider impact to ground conditions, and it cannot be adequately addressed by project-specific mitigation alone.

19.10 Cumulative impact of EMF

EMFs are generated by;

- Underground and aboveground AC cables;
- Inverters convert DC electricity from panels to AC)
- Transformers;
- On-site substations;
- BESS;
- Grid connection infrastructure

The solar panels themselves produce static (DC) electric fields but are considered weak and largely contained.

Effects on people:

Measurements at operating solar schemes are generally show magnetic fields:

- are highest immediately adjacent to transformers and underground cables;
- Drop off rapidly with distance (typically within a few meters);
- Are usually well below the exposure limits recommended;

Due to the rapid fall-off, cumulative exposure to nearby residents from a single solar field is generally low.

But what about multiple fields in close proximity to each other and on a far larger scale than previously researched? There is NO research to support or oppose EMF harm to humans on this scale however plenty of antidotal evidence.

Cumulative effects on wildlife are very different especially on bats, pollinators, fish and aquatic life although research is still limited it is now showing signs of being detrimental.

Cumulative effects of EMF exposure with other infrastructure associated with industrial sized solar like high-voltage transmission lines, BESS, substations is considered greater especially if exposure is near them all.

The cumulative risk is a material consideration under the NSIP regime and NPPF requirements to consider EMF harm, and it cannot be adequately addressed by project-specific mitigation alone.

19.11 Cumulative impact to utilities

The cumulative impact on utilities in relation to the multiple Sub-Sites of 7 of the East Pye Solar proposal becomes significant once the scheme is assessed alongside other solar projects, housing

growth, grid-reinforcement works, and energy infrastructure upgrades in the Long Stratton area and surrounding villages.

This Site comprises several rural parishes with limited existing utility capacity, minimal redundancy, and infrastructure designed for dispersed agricultural use, not for industrial-scale generation.

Local network improvements are about avoiding future power outages not expanding the capacity.

The area currently has:

- Low-capacity rural electricity distribution (11-33kV);
- Limited water and wastewater infrastructure, often reliant on small mains or private systems;
- Minimal telecoms infrastructure, with patchy mobile coverage and limited fibre. Many households rely on satellite

Many rural properties rely on satellite services, like Starlink, for communication and many mobile phone providers are now offering satellite services as backup due to issues with signal problems in rural environments.

The Scheme includes extensive power conversion equipment, BESS installations and multiple high-voltage substations. The Environmental Statement should clarify whether electromagnetic emissions have been assessed for compatibility with modern satellite broadband services operating in Ku- and Ka-band frequencies, including user terminals located within the nearby rural properties, together with any proposed monitoring and complaint resolution procedures should interference be reported during operation.

The baseline is highly sensitive to cumulative pressure.

Cumulative effects occur when Site 7 of the East Pye Solar scheme is considered along side:

- Other solar projects feeding into the same grid corridor;
- Housing developments in Long Stratton, Hempnall, Tasburgh and beyond;
- Grid-reinforcement works for the Norwich-Branford 400kV line;
- Battery Storage installations;
- Road and drainage upgrades.

Each development places demands on utilities and together they create system-wide stress.

Site 7, when assessed cumulatively with other Solar proposals, housing development and energy-infrastructure works, would:

- Overload local electricity and telecoms network;
- Increase pressure on water and wastewater systems;
- Alter drainage and hydrology across multiple sites;
- Create long-term waste- management challenges;
- Introduce permanent grid-reinforcement.

This would result in major adverse cumulative impacts on utilities that cannot be mitigated. This cumulative connection is a material planning concern under the NSIP cumulative effects guidance, NFFP infrastructure policies and local plan requirements for sustainable development.

19.12 Cumulative impact of major accidents and disasters

The Scoping Opinion issued in **February 2025** explicitly requested that "Major Accidents and Disasters" be a dedicated chapter in the upcoming Environmental Statement, rather than being "scoped out" as originally proposed by the developer.
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Site 7 is an Area of mixed sensitivity:

- *Of High Sensitivity yet seen as low-risk baseline even though it has a major road network passing through it;*
- *The area of Long Stratton, Tharston and Hapton Parish, along with all the surrounding parishes, is served by limited-capacity emergency services using the same narrow rural lanes as residents;*
- *Characterised as main settlement and dispersed properties, farms and heritage assets with long response times in adverse conditions;*
- *Fire and Rescue is mainly run as 'on-call';*
- *The nearest A&E department is approximately 15 miles away and would take 30mins on a blue light;*
- *Assisted by air ambulance for longer distances and more serious emergencies;*
- *The main emergency route is A140 from Norwich for specialist Fire and Rescue as well as emergency medical attendance.*

That means the landscape has little built-in resilience to multiple, simultaneous incidents.

Cumulative risk arises when Site 7 of the East Pye Solar scheme is considered alongside:

- Other solar sites, further solar projects and associated BESS and Substations;
- Housing growth and increased traffic;
- Grid-reinforcement works and high-voltage infrastructure;
- More HGVs, more plant, more people, and more complex utility networks.

Each scheme in isolation is presented as 'low-risk' however together they raise the probability, complexity and consequence of major incidents.

When assessed cumulatively with other solar projects, housing growth and grid-reinforcement works, East Pye Solar materially increases the overall risk profile of the parish, and neighbouring parishes within the scheme, in relation to major accidents and disasters.

The combination of intensified HGV traffic, BESS and substation fire potential, pollution pathways, altered drainage and constrained emergency access results is a higher likelihood and greater consequence of serious incidents than would otherwise exist in this low-risk rural area.

The cumulative risk is a material consideration under the NSIP regime and NPPF requirements to consider major accidents and disasters, and it cannot be adequately addressed by project-specific mitigation alone.

19.13 Cumulative impact of glint and glare

- **Cumulative Impact Potential:** Cumulative glint and glare effects are considered possible for the East Pye Solar Project especially to Sub-sites next to road networks like Site 4 and Site 2C that are adjacent to the A140 and Site 5 next to B1527, causing visual discomfort and, the very least, sudden distraction;
- Glint and Glare will be noticeable across the area especially from those sites that are on elevated or undulating topography like site 5 and site 7 or stood proud of the road network like Sub-Site 4A;
- **Tibenham Airfield (Gliding Centre):** The General Aviation Advisory Committee (GAAC) and local gliding clubs have raised significant safety concerns regarding the proximity of East Pye Solar to Tibenham Airfield regarding glint and glare, bird strike and proximity to the runway;
- **MoD** have raised objections to The Droves due to safety concerns over bird strike and interference with radar as well as glint and glare. As the area of South Norfolk proposed for East Pye Solar is used daily by RAF and AAF for ‘dog fighting’ manoeuvres and low flying military transport plans, the scheme could have significant impact to their daily flight training and should be considered;
- **Glint and Glare:** A dedicated technical assessment is required to evaluate potential dazzle for pilots on approach or in the circuit. The Scoping Opinion mandates that the Environmental Statement (ES) assess these effects for both Tibenham and other nearby private airfields (e.g., Old Buckenham Aerodrome).

The cumulative risk is a material consideration under the NSIP regime and NPPF requirements to consider glint and glare risk, and it cannot be adequately addressed by project-specific mitigation alone.

Conclusion

The scheme would cause extensive and, in several respects, unmitigable harm to protected species, chalk-stream ecology, ancient woodland and SSSI-linked habitats, designated and non-designated heritage assets, best and most versatile agricultural land, rural communities, public rights of way, landscape character and local infrastructure. These harms are location-specific and cannot be made acceptable simply by later mitigation, planting, management plans, or post-consent licensing. They are not outweighed by any demonstrated regional need for this scheme in this location, particularly where the applicant has not shown that East Pye Solar is required to meet East Anglia's renewable energy targets or that less harmful alternatives have been properly assessed. The project therefore fails the basic planning balance: it would impose severe, long-term and legally significant harm on South Norfolk without a compelling, site-specific public need.

In particular, Site 7 should not be included within the East Pye Solar Development Consent Order application. Site 7 is not merely environmentally sensitive. It contains multiple legal, ecological, hydrological, heritage and infrastructure constraints which have not been resolved and which, on the available evidence, are not capable of being made acceptable by mitigation, later survey work, planning requirements, or post-consent licensing.

Site 7 is the largest land parcel grouping in the East Pye Solar scheme. The applicant's own scoping material describes Site 7 as 327 hectares and confirms that it comprises twelve sub-sites, 7A to 7L. It lies close to Hempnall, Tasburgh, Saxlingham Nethergate and Woodton, with residential properties recorded as close as 30 metres from sub-site 7D, 120 metres from 7F, and 15 metres from 7L. The applicant also identifies multiple ancient woodlands within 2 km of Site 7, including Saxlingham Grove adjacent to sub-sites 7F and 7G, and confirms that Shotesham-Woodton Hornbeam Woods SSSI borders sub-sites 7F, 7G and 7H.

The effect is that Site 7 is not an ordinary agricultural site. It is a large, fragmented and ecologically connected block of land within a sensitive chalk-stream catchment, adjoining ancient woodland and SSSI habitat, overlapping functionally important bat habitat, affecting historic rural settlements and conservation-area settings, and requiring works close to or through highly constrained rural lanes, public rights of way, utilities and water receptors.

For the reasons set out below, the Examining Authority should treat Site 7 as a fundamental objection point. It should not be included in the Order Limits unless and until the applicant can demonstrate a lawful, deliverable and environmentally acceptable scheme. On the current evidence, it has not done so.

1. Site 7 has no demonstrated need sufficient to justify these location-specific harms

The applicant relies on a general national need for renewable energy. That is not sufficient to justify placing this particular scale of industrial solar and electricity infrastructure in this particular location especially that regional transmission solar capacity targets are met or exceeded by existing,

consented and pipeline projects, and that general claims about “optionality” or attrition do not justify severe harm in a highly sensitive landscape.

The most serious harms on Site 7 are not generic or readily mitigable. They arise from the location itself: proximity to ancient woodland and SSSI habitat, the River Tas chalk-stream catchment, confirmed protected species habitat, Saxlingham Nethergate and other historic settlements, narrow historic lanes, public rights of way and rural infrastructure. If a scheme is not required in this location, these harms cannot be justified merely by invoking national renewable energy policy at a high level.

2. Barbastelle bats: no credible European Protected Species licensing pathway

East Pye Solar has confirmed that the whole area of the Scheme is of national importance for bats. Land Parcel 7 lies within overlapping Core Sustenance Zones for barbastelle bats, a European Protected Species, and directly adjoins ancient woodland confirmed to support maternity colonies. It identifies Saxlingham Nethergate 7D and 7F as land essential for foraging, commuting and maintaining functional connectivity between maternity sites.

This is not a minor ecological matter that can be solved by planting hedges around solar panels. Barbastelles are highly light-sensitive, woodland-edge and dark-corridor specialists. The proposed development would introduce solar arrays, fencing, access tracks, lighting, construction activity and a 132 kV substation within a landscape used for commuting and foraging.

Because barbastelles are European Protected Species, the relevant question is not simply whether some mitigation might reduce effects. The question is whether the applicant can demonstrate a licensable development pathway. That requires satisfaction of the strict derogation tests, including no satisfactory alternative and maintenance of favourable conservation status. Where a development would damage or sever functional habitat within overlapping maternity-colony sustenance zones, the licensing bar is high. On the evidence available, the applicant has not demonstrated that a Natural England EPS licence could lawfully be granted.

This gateway issue cannot be left to a post-consent licence application. A DCO should not be granted on the assumption that a lawful EPS licence will later be obtained where the evidence before the Examination indicates that favourable conservation status cannot be guaranteed and no satisfactory alternative layout has been demonstrated. If Site 7 is functionally required to the scheme but cannot be licensed, that undermines the deliverability of the whole development.

3. Ancient woodland and SSSI risk: Site 7 is immediately adjacent to protected ecological assets

The applicant’s own scoping description confirms the proximity of Site 7 to multiple ancient woodlands and nationally designated ecological sites. Saxlingham Grove is recorded as adjacent to sub-sites 7F and 7G, while Shotesham-Woodton Hornbeam Woods SSSI borders sub-sites 7F, 7G and 7H.

This proximity is significant because the harm is not limited to direct land-take. Solar development at this scale can affect ancient woodland and SSSI function through hydrological change, dust, lighting, noise, vibration, construction disturbance, changes in predator pressure, fragmentation of commuting routes, and alteration of the surrounding supporting habitat. The applicant has not demonstrated that these effects can be excluded, particularly where the same land is also part of a wider barbastelle bat landscape.

The SSSI and ancient woodland context reinforces the legal seriousness of the Site 7 objection. These are not ordinary receptors. They carry strong national policy and statutory protection. Where development directly abuts such assets, the burden is on the applicant to prove that harm will be avoided, not merely that it may be managed later through outline plans.

4. River Tas chalk stream and white-clawed crayfish: no lawful construction methodology has been demonstrated

Site 7 is directly hydrologically connected to the river Tas chalk stream; drilling under the Tas is proposed to link Sites 5 and 7. Recent survey evidence from Norfolk Rivers Trust, provided to the applicant in December 2025, identifies a breeding colony of white-clawed crayfish in the Tas at Saxlingham Thorpe within 2KM of site 7. The applicant's 'walk-over' aquatic surveys, carried out when ditches and streams were dry, are inadequate in these circumstances.

White-clawed crayfish are a highly protected and declining native species. The Environment Agency's scoping comments record that EA records show the presence of white-clawed crayfish in the River Tas. The EA recommended a commitment to survey for crayfish at relevant locations when works affecting watercourses are known. The same comments identify the River Tas as a chalk stream priority habitat and a focus of EA activity.

This is a major legal and practical constraint. The construction of Site 7 would require cabling, trenching, haulage, possible Horizontal Directional Drilling, works near ditches and watercourses, and potentially works within a fissured chalk geology. There are clear risk pathways: cabling and trenching, potential HDD beneath or near fissured chalk, haulage and compaction, and sediment and pollution risk to the hyporheic zone.

Chalk streams are exceptionally sensitive to sedimentation, pollution, hydrological disturbance and changes to groundwater/surface-water interaction. White-clawed crayfish are particularly vulnerable to sediment, pollution, habitat disturbance and invasive species transfer. Without full crayfish surveys, a hydrological and hydrogeological assessment, a Water Framework Directive assessment, and a proven construction method, the applicant cannot demonstrate that Site 7 can be built without unlawful harm.

It is not enough for the applicant to say that watercourse impacts will be managed through a future CEMP or later method statements. If the development requires works in or near a chalk stream supporting protected species, the lawful construction pathway must be demonstrated before consent.

5. Water Framework Directive and water environment: the applicant has not proved no deterioration

Site 7 sits in a highly sensitive chalk-stream and chalk-aquifer catchment, with a high degree of hydrological connectivity directly to the Tas chalk stream. Impacts on private water supplies, private sewerage and hydrological connectivity have not been properly assessed.

Any watercourse crossing, ditch crossing, HDD, haul route, trenching, runoff change, compaction, sediment release or pollution pathway must be assessed against the requirement to prevent deterioration in waterbody status. The applicant has not shown that the construction and operation of Site 7 would avoid deterioration of the River Tas system or avoid impacts on priority chalk-stream ecology.

Where a scheme risks deterioration of a chalk stream and harm to protected aquatic species, the legal test is precautionary and evidence-led. On the present material, the applicant has not supplied the required evidence to pass that test.

6. Absence of botanical survey: the ecological baseline is legally inadequate

A level 6 botanist familiar with the local botanical record wrote an open letter, copied to East Pye Solar pre-application, stating that rare and priority plant assemblages associated with long-established grassland, roadside verges, access routes and cable corridors were in the location of this Scheme. He called for two season surveys to be undertaken to understand the botanical baseline before the application progressed further. This work has not been carried out.

Site 7, its access routes and cable corridors are known to support very rare botanical assemblages, no botanical survey has been carried out despite road-widening and haul-road proposals. The absence of botanical survey is not a minor evidential gap. It means the applicant has not established which habitats and species would be lost, damaged or fragmented. Without that baseline, the applicant cannot lawfully finalise the layout, design road widening, design cable routes, assess Biodiversity Net Gain, assess cumulative ecological impacts, or prove that impacts can be avoided or mitigated.

A DCO should not be granted where the applicant has not identified the ecological assets it may destroy.

7. Heritage, conservation areas and historic rural landscape: harm cannot be screened away by distance

Site 7 lies within a historic rural landscape of high sensitivity. South Norfolk is of national importance for its quantity and quality of pre-1750 rural architecture, with over 300 listed buildings in the zone of influence. Site 7 is so large that the settings of multiple Grade II* and Grade II listed buildings and conservation areas are affected.

The Site 7 poses direct harm to Saxlingham Green Conservation Area and listed buildings. Saxlingham Nethergate is not simply a receptor near the scheme, but is part of the historic

experience of the landscape affected by sub-sites 7D and 7F, construction routes, AIL routes, lighting, fencing, traffic, and the industrialisation of open rural approaches.

The settings of listed buildings and conservation areas must be properly assessed, and great weight must be given to their conservation. In a landscape where listed buildings, ancient lanes, historic greens, church approaches, Boudica Way, and rural settlement form a coherent historic environment, the harm is cumulative and experiential.

Screening heritage harm by arbitrary distance or relying on future planting is not adequate. Planting does not restore tranquillity, remove industrial character, undo fencing, remove substations, prevent traffic vibration, or preserve the historic relationship between village, lanes, fields and public routes.

8. Public rights of way, Boudicca Way and historic route severance

Site 7 poses serious harm to public rights of way and to Boudicca Way, which is South Norfolk's only long-distance footpath. Boudicca Way runs along the length of the Saxlingham Green conservation area and links with Boudicca Way. Industrial solar development would destroy historic and experiential value, conflict with public access and heritage objectives, and create perceived unsafe confined spaces for users.

High security fencing, panels, substations, cabling compounds, construction traffic, AIL movements and loss of open rural views would change the character of the rights-of-way network for the lifetime of the development. Multiple public rights of way and recreational receptors would be impacted across Site 7, including Hempnall FP1-5, Hempnall BR30, Saxlingham Nethergate FP9-14, FP27, FP28, Saxlingham Nethergate RB17, Tasburgh FP2 and Woodton RBN10.

For a 60-year development, this is not temporary disruption. It is the long-term industrialisation and enclosure of a historic rural access network for the remaining lifetimes of most residents.

9. High-pressure gas main and utilities: unresolved safety and deliverability risk

The high-pressure gas main crosses land parcel 7F and passes close to the proposed substation, creating a fire and explosion safety concern. Rural fibre-optic broadband infrastructure is situated within Land Parcel 7; the applicant has not mapped it, consulted operators or users, or assessed diversion, protection or outage risk.

These are not peripheral utility issues. A high-pressure gas main close to electrical infrastructure, construction compounds, cabling, fencing and access works is a major constraint. Similarly, rural broadband is essential infrastructure for homes, farms and businesses. Damage or diversion could cause significant community and business harm and may materially affect construction feasibility.

The applicant has not demonstrated that Site 7 can be constructed and operated safely around these constraints. A DCO should not authorise development over or near such infrastructure on the basis of later discovery and later agreement.

10. Residential amenity, schools, care home and rural lanes

Site 7 gives rise to serious and unresolved objections in relation to construction traffic, Abnormal Indivisible Loads, noise and vibration, highway safety and residential amenity. The applicant's own scoping material records residential receptors extremely close to Site 7, including properties approximately 30 metres north of 7D, 120 metres north-east of 7F, and 15 metres east of 7L. The noise and vibration baseline also identifies sensitive receptors around Church Lane, The Green, Springwood Lane, Pymars Lane, Fairstead Lane, Quaker Lane, Tasburgh and other locations surrounding Site 7, together with numerous public rights of way used by walkers, riders, cyclists and local residents.

These are not remote or isolated receptors. They are homes, village streets, rural lanes, a primary school, a care home on The Green at Saxlingham Nethergate, historic buildings and community routes lying close to proposed construction areas, construction compounds, access routes, cable works and AIL routes. The applicant has not demonstrated that construction traffic, HGV movements, AIL deliveries, road widening, vegetation removal, temporary traffic management, noise, vibration, dust and disturbance can be accommodated without unacceptable harm to residents and road users.

Saxlingham Nethergate is particularly sensitive. It has narrow unclassified roads, existing congestion, known flooding constraints, restricted HGV access and historic buildings close to the proposed AIL route. The movement of abnormal loads, heavy construction vehicles and associated plant through or near this village would create obvious risks to highway safety, pedestrian safety, school access, care-home amenity, residential tranquillity and the structural integrity of vulnerable historic buildings. These impacts are not adequately addressed by reliance on a future Construction Traffic Management Plan or later route agreements.

The problem is not simply the number of vehicle movements. It is the incompatibility between industrial-scale construction logistics and a rural village-edge road network that was never designed for this type or intensity of traffic. Narrow lanes, close residential frontages, limited passing places, constrained junctions, flooding, public rights of way, school movements and vulnerable receptors all reduce the practical scope for mitigation. Measures such as timing restrictions, banksmen, signage or temporary traffic controls cannot remove the fundamental conflict between the scheme and the local highway environment.

The same constraints also undermine construction feasibility more broadly. The narrow lanes and close receptors that make traffic impacts unacceptable also constrain emergency access, ecological mitigation, heritage protection, noise control and safe construction working. For Site 7, traffic, AILs, noise and residential amenity are therefore not secondary matters. They are part of the wider case that this land parcel is unsuitable and undeliverable for industrial-scale solar and associated electricity infrastructure.

11. Cumulative impact and no credible construction scenario

Any one of the above issues would require serious examination. Taken together, they show that Site 7 is not deliverable as proposed. No licensable ecological pathway has been demonstrated, no lawful

construction methodology has been shown for the River Tas, no ecologically informed layout is possible, and no reliable infrastructure protection strategy exists.

Site 7 cannot be treated as a normal land parcel where residual impacts can be balanced against claimed benefits. It is a convergence point for strict legal protections and unresolved physical constraints. The applicant is asking the decision-maker to assume that multiple future licences, surveys, approvals, method statements and mitigation plans will all be achievable. That is not a robust basis for consent.

12. Relief sought

We respectfully request that the Examining Authority and Secretary of State refuse development consent for East Pye Solar.

In the alternative, Site 7 should be removed from the Order Limits unless the applicant first provides, and consults upon, a legally adequate evidence base demonstrating:

• full barbastelle bat survey evidence and a credible Natural England EPS licensing pathway;

• proof that favourable conservation status of barbastelles and other protected species can be maintained;

• full white-clawed crayfish surveys and assessment of all River Tas, ditch, cable, HDD and haul-road impacts;

• a Water Framework Directive screening and, if required, full assessment demonstrating no deterioration;

• full-season botanical surveys of Site 7, access routes, verges, road-widening areas and cable corridors;

• a revised Biodiversity Net Gain assessment based on actual survey data;

• a complete hydrological and hydrogeological assessment of the River Tas, ditches, chalk aquifer, private sewerage and vulnerable water receptors;

• a full heritage-setting assessment for Saxlingham Nethergate, Saxlingham Green, listed buildings, conservation areas and historic routeways;

• a public rights of way and Boudicca Way assessment that addresses qualitative severance, safety, enclosure and loss of historic experience;

• a utilities and safety assessment for the high-pressure gas main, broadband infrastructure and any other buried services;

• and a revised construction methodology proving that Site 7 can actually be built without unlawful ecological, hydrological, heritage, safety or community harm.

Unless and until that evidence is supplied, Site 7 should be treated as legally and practically undeliverable. The applicant has not shown that this harmful scheme is necessary, fairly assessed, lawfully licensable, or environmentally acceptable in this location.

AI Statement: BEPS works from manual research carried out by its human research team. It also uses a bespoke GPT within a closed project folder to cross-reference manual research with uploaded East Pye Solar ES chapters, statutory consultee submissions, peer-reviewed research documents, EIA best practice, PINS scoping and other PINS documents. Responses are structured and drafted within the closed project but all submissions are argued, assembled, edited, checked manually by humans, and are the responsibility of BEPS.