Objections submitted in response to East Pye Solar

PINS Reference: EN0110014

Land Parcel 3

Researched and written by [redacted].

Submitted by BEPS (Block East Pye Solar [redacted])

Contents

Chapter 1: Introduction.....2
Chapter 2: Environmental Impact Assessment Methodology.....3
Chapter 3: Site and Surroundings.....4
Chapter 4: Site and Surroundings.....5
Chapter 5: Reasonable Alternatives and Design Evolution.....6
Chapter 6: Site and Surroundings.....7
Chapter 7: Landscape and Visual.....8
Chapter 8: Ecology and Biodiversity.....9
Chapter 9: Water Environment.....10
Chapter 10: Cultural Heritage.....11
Chapter 11: Transport and Access.....11
Chapter 12: Noise and Vibration.....12
Chapter 13: Air Quality.....13
Chapter 14: Socio-Economics.....14
Chapter 15: Soils and Agriculture.....15
Chapter 16: Ground Conditions.....16
Chapter 17: Electromagnetic Fields.....17
Chapter 18: Other Environmental Matters.....18
18.1 Utilities.....18
Chapter 19: Cumulative and In-Combination Effects.....19
Conclusion.....20

Chapter 1: Introduction

Land Parcel 3 - Description and Current Status

Land Parcel 3 is an 82 hectare area of high quality arable farmland, grade 3a and 3b, bordering ancient woodland, lying to the south of the hamlet of Lundy Green, which itself lies to the South of the village of Hempnall.



The main part of Land Parcel 3 is a large flat field edged by hedges, ditches, lines of trees and, to the east, a sizable area of woodland.



The view east along the footpath towards Spring Wood. The field to the right of the path in this image will be entirely covered by Solar Panels, with a fence and security cameras etc.

The other part, to the north of the wood, is another, smaller field, also edged by trees, hedges and the north side of the wood, where there is a strip of mixed woodland. The south east edge of the field borders the Alburgh Road with a hedge and a ditch. There is a ditch between this field and the smaller field leading up to the corner of the wood where it ends and the wood begins.



The view east from the footpath, across the ditch and across the field from the north/south footpath towards the Alburgh Road.

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Executive Summary

Land Parcel 3B is **incapable of lawful, safe or practical delivery**. It is subject to multiple **independent, front-loaded and mutually reinforcing fatal constraints**, including European Protected Species impacts, ancient woodland adjacency, confirmed bat maternity and hibernation sites, extreme unexploded ordnance risk, water pollution pathways to a protected chalk stream, lack of compliant construction access, heritage setting harm, public rights of way severance, harm to tourism businesses, and strategic Great Crested Newt constraints.

Several of these constraints are **absolute**. Others compound so that no realistic mitigation, redesign or licensing pathway exists. Land Parcel 3B is therefore **undeliverable**

in principle, and its inclusion further demonstrates that the East Pye Solar scheme is structurally unsound as a whole.

1. Barbastelle bats – maternity colony adjacency and CSZ overlap

Land Parcel 3B directly adjoins **Spring Wood**, which is both **ancient woodland** and a **confirmed barbastelle maternity colony**. The parcel lies within the associated **Core Sustenance Zone (CSZ)**, meaning the land provides essential functionally linked habitat supporting breeding success.

The proposed development would introduce:

- lighting, noise and vibration;
- prolonged construction disturbance;
- habitat fragmentation and loss of functional connectivity.

On this evidence, offences under the Habitats Regulations **cannot be excluded**, and a **European Protected Species licence would be required**. The application provides **no evidence that the statutory tests could be met**, particularly given the absence of alternative siting and the cumulative CSZ impacts across the wider scheme. This is a **front-loaded legal impediment** that cannot be deferred.

2. Bat hibernacula – WWII bomb shelters

Land Parcel 3B contains **multiple WWII bomb shelters deliberately converted into bat hibernacula**. These constitute protected **bat resting places**, irrespective of current seasonal use.

Ground disturbance, vibration, drainage alteration or microclimate change would risk damage or disturbance to EPS resting places, constituting an offence unless licensed. Given the density of bat features, proximity to a maternity colony and scale of works, **licence grantability is highly doubtful**, reinforcing undeliverability.

3. Great Crested Newts – strategic area

The parcel lies within a **strategic area for Great Crested Newts**, indicating high likelihood of presence and functional habitat connectivity. Development would involve trenching, soil stripping, access works and fencing, materially increasing EPS offence risk.

When combined with the existing barbastelle licensing burden, this creates **licence stacking**, making lawful delivery increasingly unrealistic.

4. Ancient woodland adjacency and ecological network fragmentation

Spring Wood is designated **ancient woodland** and forms part of a wider woodland and habitat network. Development immediately adjacent to ancient woodland is fundamentally constrained and buffers cannot be relied upon for mitigation. It is also a County Wildlife Site.

Security fencing, access tracks and arrays would fragment ecological networks, disrupt deer and wildlife movement, and generate secondary impacts that cannot be resolved without further harm. The parcel is therefore **incompatible with basic ecological protection principles**.

5. Unexploded ordnance – former RAF / USAAF bomb dump

Land Parcel 3B was the **heavy bomb dump serving RAF / USAAF Hardwick Airfield**, with adjacent land forming part of the wider ammunition storage complex. There is a **high likelihood of unexploded ordnance (UXO)**.

This presents:

- a severe risk to construction workers;
- major constraints on piling, trenching and cabling;
- insurability and liability barriers.

UXO risk at this level is not a routine mitigation issue and **materially undermines construction feasibility and programme certainty**, rendering the parcel practically undeliverable.

6. Water environment and contamination pathway – River Tas and white-clawed crayfish

A **watercourse runs through Land Parcel 3B**, forming a direct hydrological pathway to the **River Tas**, which supports **white-clawed crayfish** (a European Protected Species).

The land has a history of **military use**, with associated risk of legacy contamination, including historic pollutants and firefighting foams. Ground disturbance would create a foreseeable risk of contaminant mobilisation into the Tas catchment, potentially:

- committing EPS offences;
- breaching Water Framework Directive objectives;
- creating regulatory and criminal liability.

This risk is inherent to the site and **cannot be mitigated away**.

7. Ground conditions and flooding

The parcel comprises **heavy clay soils** with **groundwater at or near the surface**, subject to seasonal standing water and groundwater flooding. Machinery access is restricted for much of the year.

These conditions undermine:

- construction feasibility;
- pile installation and stability;
- access and long-term maintenance.

Claims of reversibility or temporary impact are **not credible** in these ground conditions.

8. Construction access – absence of compliant B-road access

Highways advice for the scheme requires **construction access from suitable B-class roads**. Land Parcel 3B **cannot be accessed from a B road** and is served only by narrow rural lanes with flooding, sharp bends and residential frontage.

Routing heavy construction traffic through these lanes would be unsafe and unacceptable. Without compliant access, **the parcel fails a basic deliverability test**.

Norfolk Highways has suggested a haul route from site 5. The ecological impact of this has not been assessed.

9. Heritage harm – Lundy Green listed buildings

Land Parcel 3B lies in close proximity to the **cluster of Grade II listed buildings at Lundy Green**, a historic rural hamlet whose significance derives in large part from its agricultural setting and separation from industrial development.

Solar infrastructure would fundamentally alter this setting through scale, fencing, lighting and visual industrialisation. Harm would arise from the **loss of historic rural context**, not isolated viewpoints, and cannot be mitigated without further eroding openness.

This represents **high-weight designated heritage harm** that compounds other fatal constraints.

10. Public rights of way – severance and experiential harm

Public rights of way cross and skirt Land Parcel 3B. Development would force walkers through fenced corridors with extensive arrays on either side, destroying openness, tranquillity and landscape experience.

This constitutes **qualitative severance**, not minor diversion, and conflicts with countryside access and wellbeing objectives.

11. Harm to tourism and holiday-let businesses

The area supports **holiday-let accommodation and rural tourism**, reliant on landscape quality, tranquillity, dark skies and access to woodland and public footpaths.

Industrial solar development would materially harm the attractiveness and viability of these businesses through:

- visual dominance;
- lighting;
- loss of landscape character;

- degraded visitor experience.

This is an **economic and social harm**, adding further weight to the planning balance against development.

12. Aviation safety – active runways and overlapping EFATO zones

Land Parcel 3B lies in the **immediate vicinity of two active airfields**, both with **operational runways within approximately 500 metres** of the site. One runway has an **EFATO (Engine Failure After Take-Off) safeguarding zone directly over Land Parcel 3A**, while the other has an **EFATO zone incorporating Land Parcel 3B** itself.

EFATO zones represent the **highest-risk phase of flight**, where aircraft and gliders experiencing power loss must execute emergency manoeuvres at low altitude with minimal margin for error. Within these zones, any development that introduces:

- physical obstruction,
- reflective surfaces,
- fencing,
- lighting,
- turbulence or thermal disruption,
- or construction activity involving cranes and plant,

creates an **unacceptable and unmitigable safety risk**.

The proximity of **two active runways**, with **overlapping EFATO constraints affecting both Land Parcels 3A and 3B**, means that aviation risk at this location is **not incidental but structural.**

These runways do not form part of the Applicant's Glint and Glare assessment.

13. Private water supply – Farmhouse, Shelton (holiday let)

A **private water supply serving Farmhouse, Shelton**, which operates as a **holiday let business**, is located approximately **50 metres south of Land Parcel 3B**. This supply is reliant on local groundwater and is therefore highly sensitive to changes in water quality, sediment mobilisation and contamination.

Land Parcel 3B has a documented history of **military use**, including bomb storage and associated activities, giving rise to a credible risk of **legacy soil contamination**, including historic pollutants and firefighting foams. The proposed development would involve extensive ground disturbance, excavation, vehicle loading and soil handling, all of which create a **foreseeable pathway for contaminants to enter groundwater** supplying the private abstraction.

Any deterioration in the quality or reliability of this private water supply would have **direct implications for human health**, would undermine the lawful operation of the holiday let, and would expose the developer to **significant legal and civil liability**. In the absence of comprehensive site-specific investigation and enforceable protection measures—which are not provided—this risk **cannot be mitigated or deferred**. The proximity of the abstraction point (c.50 m) places it well within the zone of influence of construction activity, rendering Land Parcel 3B **undeliverable in principle**.

14. Private water supply and Drinking Water Protection Zone – Park Farm (3A)

A further **private water supply serving Park Farm** is located within **Land Parcel 3A**, which lies within a **Drinking Water Protection Zone**. This supply is reliant on local groundwater and is therefore highly sensitive to disturbance, pollution pathways and changes in hydrogeological conditions.

Land Parcel 3A has been now been removed from the scheme due to constraints. .However, Land Parcel 3A is subject to **the same fundamental constraints** as Parcel 3B, including:

- proximity to ancient woodland and barbastelle Core Sustenance Zones;
- historic military land use and associated contamination risk;
- groundwater vulnerability and surface–groundwater interaction;
- aviation safeguarding and EFATO constraints.

Using land that is itself constrained by **drinking water protection requirements and private abstractions** as mitigation is inherently flawed. Ground disturbance, planting, drainage works or habitat manipulation within Parcel 3A would create **foreseeable risk to the private water supply**, engaging human health considerations and regulatory controls that have not been assessed.

In these circumstances, Parcel 3A **cannot function as mitigation land**. This demonstrates that the scheme's mitigation strategy is **circular and ineffective**, and further confirms that **Land Parcel 3B is undeliverable in principle**, with no lawful or viable mitigation pathway available.

Overall conclusion – Land Parcel 3B

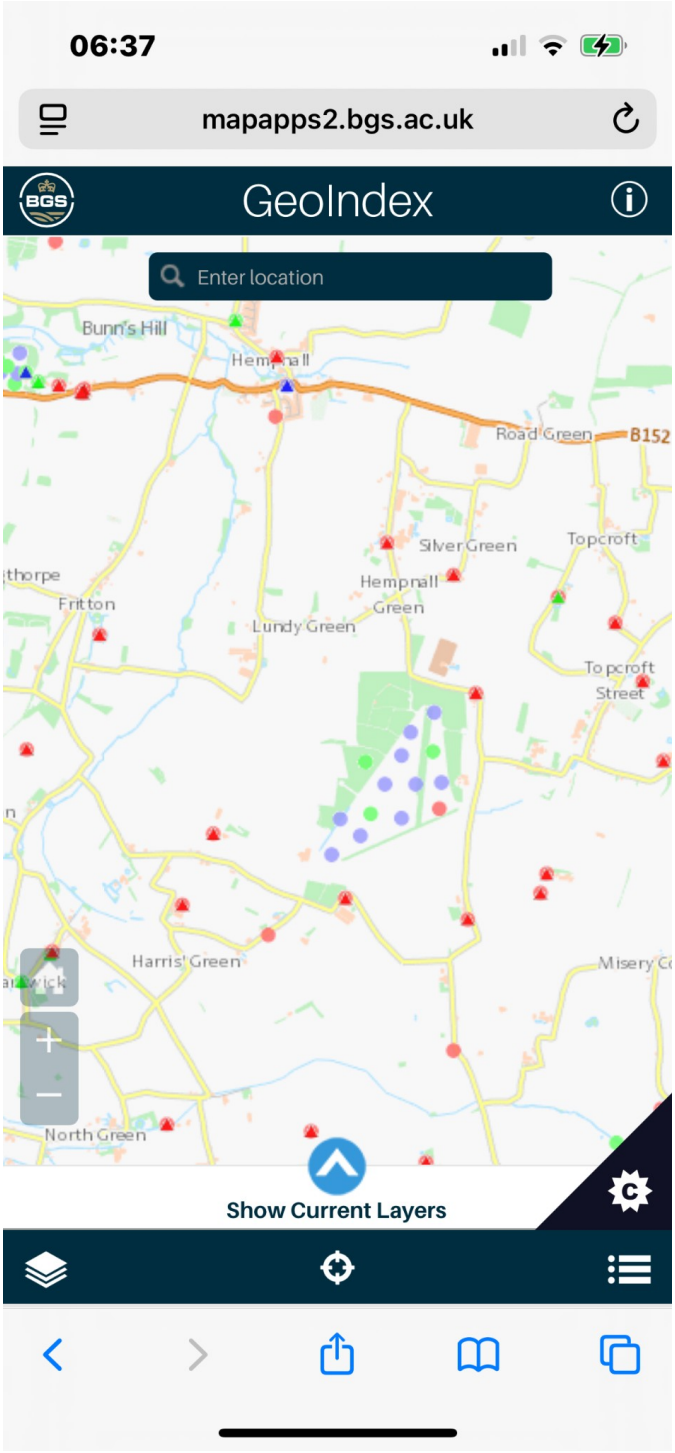
Land Parcel 3B is subject to **multiple independent fatal flaws**, including:

- adjacency to ancient woodland and a **barbastelle maternity colony**;
- **bat hibernacula** directly adjoining the site;
- strategic **Great Crested Newt** constraints;
- **UXO risk** from historic WWII USAAF Hardwick bomb dump;
- Historic Soil contamination from WWII airfield including from firefighting foams.
- direct **pollution pathways to the River Tas** affecting white-clawed crayfish;
- severe **ground conditions and flooding**;
- absence of lawful **B-road construction access**;
- designated **heritage setting harm** at Lundy Green;
- **public rights of way severance**;
- and **harm to tourism and holiday-let businesses**.
- Impact to private drinking water supplies.

These constraints are **front-loaded, non-mitigable and mutually reinforcing**. They cannot be resolved through design refinement, conditions or post-consent licensing.

Land Parcel 3B (and 3A) is undeliverable in principle, failing on European Protected Species law, ancient woodland protection, public safety (UXO and aviation), water environment compliance, physical access feasibility, heritage protection, public rights of way, and socio-economic impact. The presence of **two active runways with overlapping EFATO safeguarding zones within 500 metres of the site removes any residual margin for lawful or safe development**, and confirms that this parcel cannot form part of a deliverable scheme.

Chapter 2: Environmental Impact Assessment Methodology



Water supplies surveys and consultation

EPS should have mentioned the following private water supplies -

The map shows 3 private water supplies affected by LP3.

One at **Park Farm**, a private house which is also in a drinking water protection zone.

This supply is reliant on local groundwater and is therefore highly sensitive to disturbance, pollution pathways and changes in hydrogeological conditions.

One at **Farmhouse**, Shelton, a holiday let business reliant on local groundwater and is therefore highly sensitive to changes in water quality, sediment mobilisation and contamination.

And one at **Spring Lane Farm**, a farmhouse on the corner of spring lane near the south east corner of Spring Wood

Spring Wood

Spring Wood is a mixture of ancient woodland, replanted ancient woodland and modern plantation as a timber source. The ancient woodland consists of ancient oak trees that line the edge of Spring Wood where it abuts the main solar panel field of LP3. This proximity to the solar array and the consequent fencing and security apparatus is concerning.

"New development is frequently associated with the destruction or alteration of semi-natural habitats in the vicinity of ancient woods and the creation of large areas of terrain inhospitable for woodland species. Developments that create chemical or disturbance effects that penetrate nearby ancient woods may also effectively reduce them to smaller habitat islands. All types of development may lead to further isolation of ancient woodland:
increasing distances between favourable habitats that species must cross;
interrupting natural flows between habitats; and sub-dividing populations."
(Woodland Trust - Impacts of nearby development on the ecology of ancient woodland)

Woodland Priority Habitat Network (England) - High Spatial Priority
Woodland Improvement (England) - High Spatial Priority

Woodland - Ancient Woodland (England) - Ancient Replanted Woodland
Priority Habitat Inventory - Deciduous Woodland (England)

Well Surveys

There should have been well surveys carried out. There are a number of houses with wells that could be adversely affected.

Flora -

Botanical surveys should have been carried out in the correct season etc. There is evidence of rare plants being found in many locations in the overall scheme. This is an important consideration.

Bats -

There are documented surveys carried out by BEPS that show that Spring Wood has active Barbastelle Bat roosts within it and a confirmed Barbastelle maternity colony. Also Previous WW2 airfield bunkers in the wood were converted to Barbastelle Bat hibernacula which are very much active. These critically endangered bats also forage over the entire area of LP3

Great Crested Newts -

Almost the entire area of LP3 shows positive in the Great Crested Newts Strategic Operation areas (England) map -

Fringe 2 to Fringe 6. Core 3 to Core 6

There are Great Crested Newts in the general area covered by LP3. Photographic evidence of such exists. Surveys would have to have been carried out at the correct time(s) of year to determine their presence. There are many ponds in the curtilage of houses and farms in Lundy Green and beyond which should be surveyed for breeding populations.

Most of LP3 is a Countryside Stewardship Management Area (England)

All of LP3 is High Level Stewardship Theme area (East England Area)

LP3 is a Priority Area for CS Targeting - Lapwing

And is part of the Countryside Stewardship Scheme - Grey Partridge

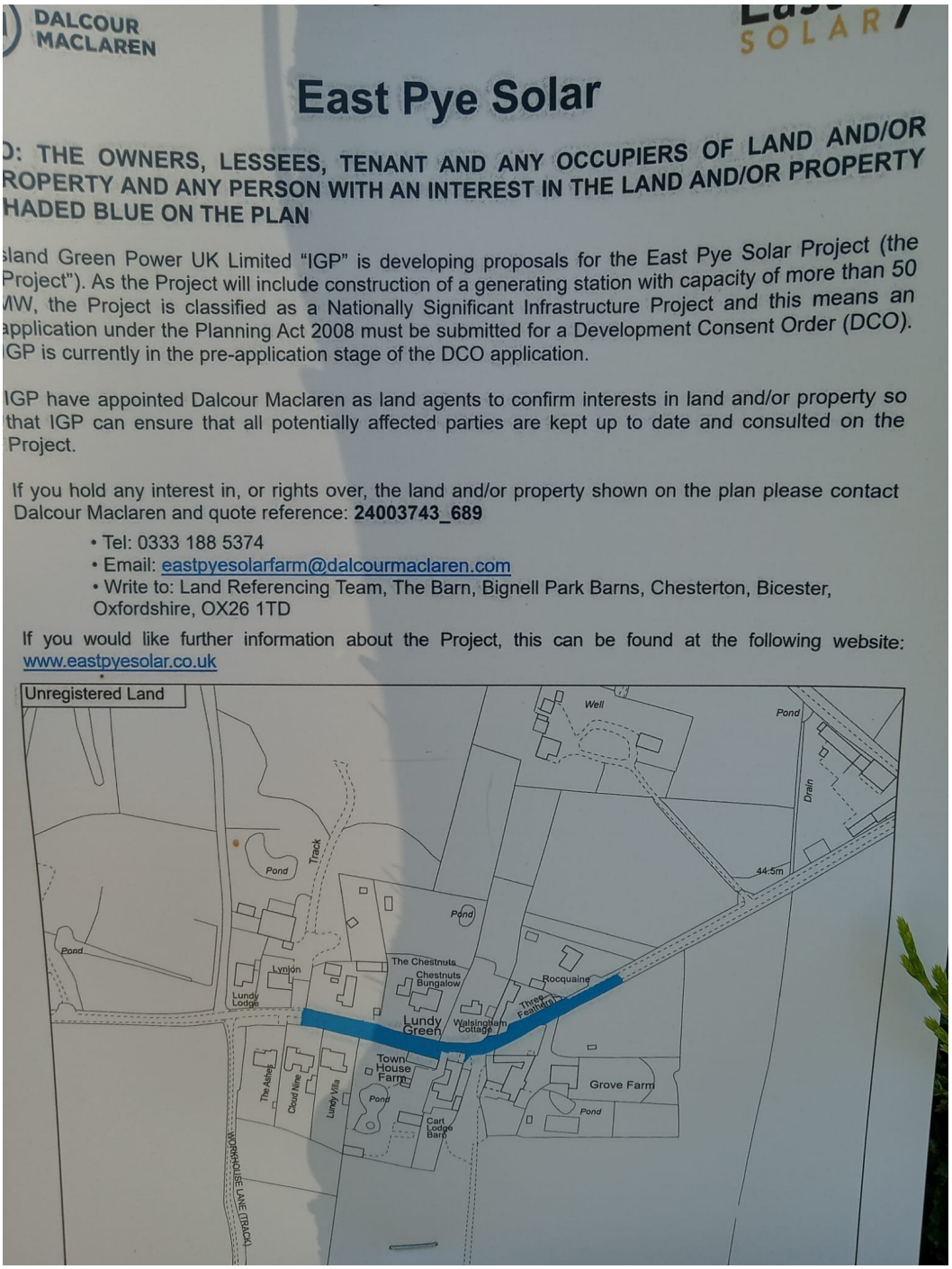
And part of the Countryside Stewardship Scheme - Turtle Dove

Insensitive communications - LIQs

Maps were posted (literally, on posts) by Dalcour Mclaren and East Pye Solar outlining the land where the cable routes were proposed to be sited. These maps are the same as the routes outlined on the PL3 map. They are vague in the extreme as they give no information as to where the cable routes would go in any detail. They encompass around 50% of the area of the large fields they would cross, and fail to indicate where the cables would cross Lundy Green Road and for that matter how they would cross the road.

Other maps and letters were sent to residents of Lundy Green inquiring about ownership of the verges on Lundy Green Road, leaving residents fearing the road widening plans would be imposed on them leading to unwelcome construction traffic being routed down Lundy Green Road. Many feared that Compulsory Purchase orders might be invoked.

This left residents unsure whether the roadside boundary hedges were going to be cut down and verges tarmacked over or otherwise spoilt.



Utilities Surveys

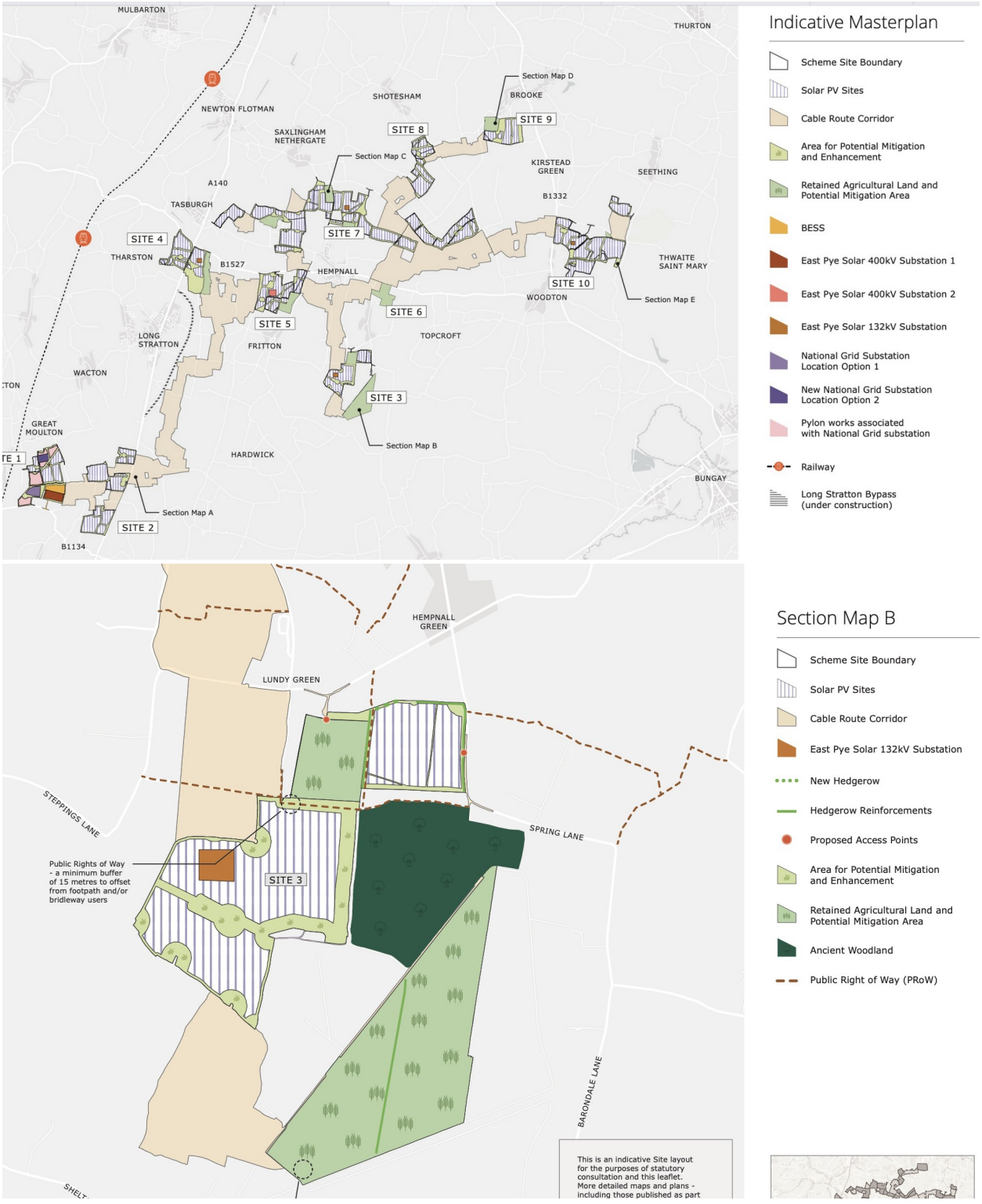
Utilities surveys should have been carried out, concerning power lines, any gas infrastructure, telephone and fibre optic cables which may be affected by construction or the completed scheme itself.

Views from listed buildings and impacted homes

Views from affected buildings, including listed buildings should be documented and analysed. Several buildings in Lundy Green would be adversely affected by the presence of the solar ‘farm’ on LP3.

No such views from Grove Farmhouse, Lundy Green, a potentially impacted building, were documented by EPS. Whether views from other impacted buildings were documented should be investigated.

Chapter 3: Site and Surroundings



NOTE - The substation has been withdrawn. It is not in the plans as submitted.

South Norfolk Council's website - NSIP - East Pye Solar - Island Green Power page

The Scheme as a Whole

East Pye Solar Ltd, part of Island Green Power, is introducing plans for a utility scale solar and battery energy storage system (BESS) on land near Long Stratton in South Norfolk, England.

The Project looks to deliver up to 500 megawatts (MW) of homegrown, renewable electricity through ground-mounted solar photovoltaic (PV) panels. We are advised this would be enough electricity to power approximately 115,000 homes and businesses annually. The scheme comprises of the construction, operation and maintenance, decommissioning of a ground-mounted solar photovoltaic (PV) generating station and associated development, including:

• A BESS;

• A number of 132kV substations location within the Solar PV Sites;

• Two 400kV substations, one adjoining the BESS site and one within Site 5; and

• A new National Grid substation operated by National Grid Electricity Transmission plc.

The scheme also involves grid connection infrastructure including works to the existing 400k overhead line and associated pylon(s), which may include relocation or moving

existing pylons, new pylons, temporary replacement pylons and restringing of overhead line. Undergrounding electricity cabling will run between the Solar PV sites within the Cable Route Corridor to connect to the BESS and National Grid Substation.

The operational phase of the scheme is expected to be 60 years. The project site currently being considered to host the Solar PV, BESS, substations, cable route corridor and associated equipment are at multiple locations, amounting to approximately 2,232 hectares (ha) of land.

Land Parcel 3 -

LP3 comprises 82 hectares of this scheme and would be connected by a long and complex cable corridor to the next nearest land parcel over a kilometre away. .

WW2 - possible soil contamination etc



Aircrews of the 93rd BG 329th BS pose on top and under wing of a B-24 Liberator at Hardwick airfield in UK on 28 May 1943.

Much of the area covered by the woodland to the east (and part of LP3) was very different in World War II. It was an American bomber base (RAF/USAAF Hardwick) and remnants of the buildings and shelters still exist amongst the trees. There is concern about the possibility of unexploded ordnance under the north east part of LP3 where it adjoins the wood, as that

was where the heavy bomb dump was located. There is also concern about any contamination still held in the soil leaching out into the water supply and general environment if the soil is disturbed. Several houses in the Spring Wood area have private water supplies. Also the surface water drainage ends up in the River Tas which has a population of White-Clawed Crayfish, a highly protected species which is very sensitive to disturbance and to contamination of the water supply.



The 1942 aerial photo opposite overlaid on a 2011 map. (Map by [redacted]

see his Geomapping pages)


93RD BOMBARDMENT GROUP (HEAVY)
328TH, 329TH, 330TH AND 409TH BOMBARDMENT SQUADRONS
AND ATTACHED UNITS
20TH COMBAT WING SECOND AIR DIVISION
8TH UNITED STATES ARMY AIR FORCE
FROM THIS AIRFIELD AND OTHERS IN ENGLAND AND NORTH AFRICA, THE 93RD GROUP FLEW A TOTAL OF 391 COMBAT MISSIONS IN SUPPORT OF THE ALLIED WAR EFFORT DURING WORLD WAR II. THESE MISSIONS WERE FLOWN FROM 9 OCTOBER 1942 UNTIL 25 APRIL 1945.
THIS MONUMENT IS DEDICATED TO THE MEMORY OF THOSE LOST IN THE WAR AND TO THE SURVIVORS WHO HELPED ACHIEVE ULTIMATE PEACE AND VICTORY
328 SQDN.
329 SQDN.
330 SQDN.
409 SQDN.
TWO MEDALS OF HONOR
TWO PRESIDENTIAL UNIT CITATIONS: NORTH AFRICA AND PLOESTI
BATTLES AND CAMPAIGNS
AMERICAN THEATER ★ ANTISUBMARINE ATO ★ AIR COMBAT-EAME THEATER ★ AIR OFFENSIVE-EUROPE ★ ANTISUBMARINE-ETO ★ EGYPT-LIYBIA ★ PLOESTI ★ TUNISIA ★ NAPLES-FOGGIA ★ SICILY ★ NORMANDY ★ NORTHERN FRANCE ★ RHINELAND ★ ARDENNES-ALSACE ★ CENTRAL EUROPE
DEDICATED 25 MAY 1987
H L. PERFITT DISS.

Lundy Green

Lundy Green is a small, very quiet hamlet to the south of Hempnall, to the south west of Hempnall Green and west of Silver Green. A single track country lane passes through it, with driveways serving as passing places when the need arises. There are several grade ll listed buildings in the main part of the village, alongside a few old, unlisted but significant buildings and some modern bungalows.



Lundy Green Road looking east from the junction with Workhouse Lane (Farm track, public bridleway)



Lundy Green Road, a short distance further along to the east



Lundy Green Road, looking west from outside The Chestnuts, a listed building



Lundy Green Road, looking west from outside Grove Farm Barn.



Lundy Green Road, looking west from outside Three Feathers, a listed building and Grove Farmhouse, a non listed but significant building



Lundy Green Road, looking west as it passes Hempnall House



Lundy Green Road, looking west from a passing place outside Hempnall House



Lundy Green Road, looking west past Town Green Farm, a listed building



A typical scene on Lundy Green Road, outside Town Green Farm, a listed building

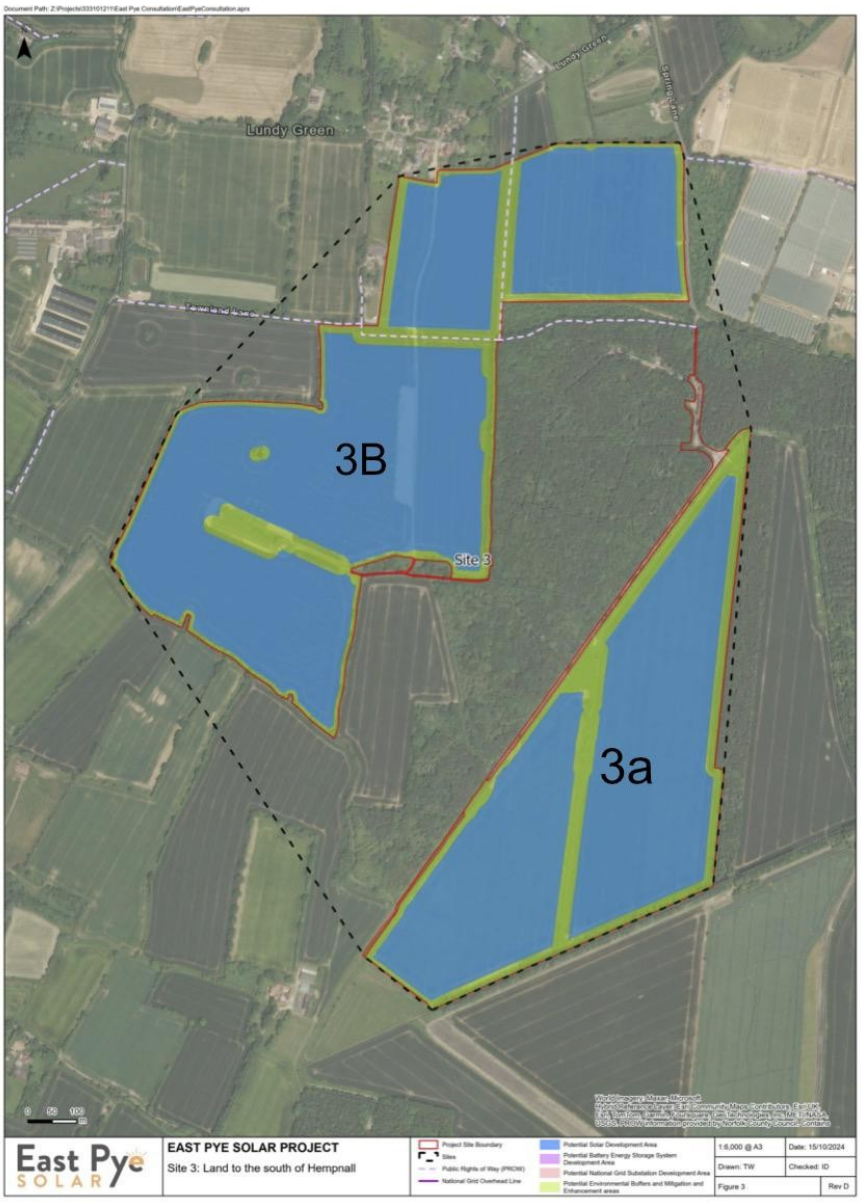
Chapter 4: Reasonable Alternatives and Design Evolution

Alternative Sites -

If any alternative sites to LP3 have been identified they need to be suggested.They were not apparent at any of the statutory consultations. No input from the community was sought.

Changes in the Design since the First Proposal -

The design has been changed since the first proposal. **LP3a**-as-was has been designated as a Retained Agricultural Land and Potential Mitigation area, as has the field between Lundy Green and the east/west footpath from Spring Wood to Workhouse Farm.



Map of original plan for LP3



Map of the plan proposed for LP3 (The substation is no longer proposed. There is no substation in the submitted plans for site 3)

The land to the south between LP3a-as-was and LP3 designated as part of the cable corridor should no longer be considered necessary as LP3a was redesignated as agricultural land/mitigation.

LP3 was previously named LP3b

The two fields in the plan for site 3 in the map finally submitted, have a new rectangular area between them which is proposed as part of the cable corridor. To access the larger field from the smaller field there will need to be an access road built running north east/south west near the north west corner of Spring wood, as well as a cable run joining the two fields.. This will seriously disrupt two footpaths, requiring their closure during construction, or possible rerouting if that is feasible. This has not been mentioned in the submission at all.

Issues Potentially Resolved -

The field between Lundy Green and the Spring Wood footpath redesignated as Agricultural/mitigation have put a greater distance between the houses in Lundy Green

that backed on to LP3b-as-was. That has helped a few residents somewhat but has resolved little else.

LP3a as was being redesignated has potentially slightly eased some environmental issues but not helped the overall issues LP3 has.

Community Involvement in Shaping the Design -

There has been very little Community Involvement in reshaping the design. What consultation the affected communities had only came after the whole layout of the solar 'farm' had been mapped out and contractually agreed with the landowners. Local communities were presented with what was largely a fait accompli. No consultation about siting of LP3 was carried out before the initial plan was suddenly dropped on the community. Allowing people to complain at various consultations is not 'working closely with the community'. Neither is concocting a scheme, in secret, with local farmers to reward them financially to give good agricultural land over to industrial scale solar power production.

The Statutory Consultation was far too brief, considering the amount of information available and the impact the proposals would make on the local communities and way of life. The people conducting it were not knowledgeable and there were many concerns which were not addressed.

The Final Design as a Response to the Key Issues Known to Affect This Site -

The Final Design does not address many of the key issues affecting this site. These are described in detail in the **Executive Summary,** but include; loss of high quality agricultural land, loss of amenity for the local community, lack of protection for critically threatened and highly protected wildlife, Possibility of unexploded ordnance due to a previous WW2 Airbase on the land, change in character from agricultural to large scale industrial and threat of contamination to private water supply to name a few.

Chapter 5: Scheme Description for this land parcel



The proposal for LP3 is that 82 hectare area of high quality arable farmland, grade 3a and 3b, bordering ancient woodland, lying to the south of the hamlet of Lundy Green, will be the site of a large solar farm consisting of 4.5 metre high tracking solar panels (substation withdrawn from submission) and land designated for a cable route. There are areas that have been removed from the original, larger scheme that have been set aside as ‘retained agricultural land and potential mitigation areas’. Some 15 metre ‘Areas for potential mitigation and enhancement’ have been proposed beside and along footpaths that cross the site and also alongside Spring Wood and other areas where belts of trees exist. With the exception of the footpath running north/south from the corner of Spring Wood. This has no 15 metre mitigation strip between it and the solar field to its west, just the other side of the ditch.

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.

Chapter 7: Landscape and Visual

A major feature of LP3 is the rural character of the landscape. The fields proposed for siting the solar panels are productive farmland which has been farmed for generations. They sit next to Spring Wood, part of which is ancient woodland. The resulting views over the fields are important to and much loved by the local community.

Physically, the presence of hundreds of 4.5 metre high solar panels in serried ranks, each about the size of a double decker bus, surrounded by fencing and security lights etc would be considerable. The solar panel array and its fencing will be highly visible from many parts of Alburgh road and Lundy Green Road, from several footpaths as well as from the curtilage of many houses in Lundy Green, several of which are grade ll listed.

At present (feb 2026) LP3 is under cultivation, and has been so for generations. To my memory going back several years crops grown have included wheat, peas, oil seed rape and sugar beet.



Public Rights of Way



A footpath runs north/south from Lundy Green Road up to Spring Wood, where it joins another footpath running west to east from the edge of the wood to the top of Workhouse Lane.

The first footpath would, as the map indicates, be only separated from a huge array of 4.5 metre high solar panels, fencing and security lights by a patchy hedge and a ditch. EPS say there will be a minimum of 15 metres of buffer between the footpath and Solar Array. The solar array on this field would stretch all the way to the Alburgh Road to the east and to Spring Wood to the north



The north/south footpath, viewed from near Lundy Green Road, looking north.



The view east from the north/south footpath over the smaller solar field towards the Alburgh road, just past the line of hedging

The second footpath runs east/west from the Alburgh Road along the north end of Spring Wood then continues along the northern edge of LP3. This footpath is totally exposed and would only be separated from a huge array of 4.5 metre high solar panels, fencing and security lights stretching out past Workhouse Farm to the east, and to the south through one distant belt of trees to another beyond, by a suggested 15 metre buffer zone which, it has been suggested by EPS, may be planted to try to screen the panels from view. That would obviously take a decade or so to have any effect.

These footpaths are much used by local people walking in the countryside and exercising their dogs. The presence of all the aforementioned solar paraphernalia would severely detract from any pleasure gained using this local amenity.



View along the east/west footpath, looking west from the corner of Spring Wood towards Workhouse Farm, visible in the distance





The view along the east/west footpath, from near Workhouse Farm, looking east towards Spring Wood



View from the east/west footpath, looking south along the edge of Spring Wood, over the larger solar field



The view from the east west footpath, looking south west over the larger solar field towards the site of the substation, which would be behind the line of hedges



The view south from the east/west footpath, looking over the larger solar field. Note the water retention and the necessity for caterpillar tracked vehicles on this waterlogged surface



View north from the east/west footpath, from the edge of the larger solar field which is immediately behind the viewer, along a rutted and waterlogged farm track to Lundy Green



The view north from the east/west footpath along the continuation of the farm track from the previous image, across the larger solar field



View from the east/west footpath, west towards Workhouse Farm, showing the proximity of the solar panel field to the curtilage of Workhouse Farm and to its outbuildings



View from where the east west footpath crosses a ditch and continues on the north side of it. The west corner of the larger solar field lies immediately on the south side of the ditch

Chapter 8: Ecology and Biodiversity

Introduction

8.1 Barbastelle Bats

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**.



Spring Wood, Hempnall Green

The row of mature oaks running along the entire west side of Spring Wood where it meets the main LP3 field contain Barbastelle roosts and maternity colonies. Feeding bats are active along that edge of the wood and forage actively over the main LP3 fields, in other

parts of the wood to the north west and over a wide area encompassing at least five core sustenance zones.

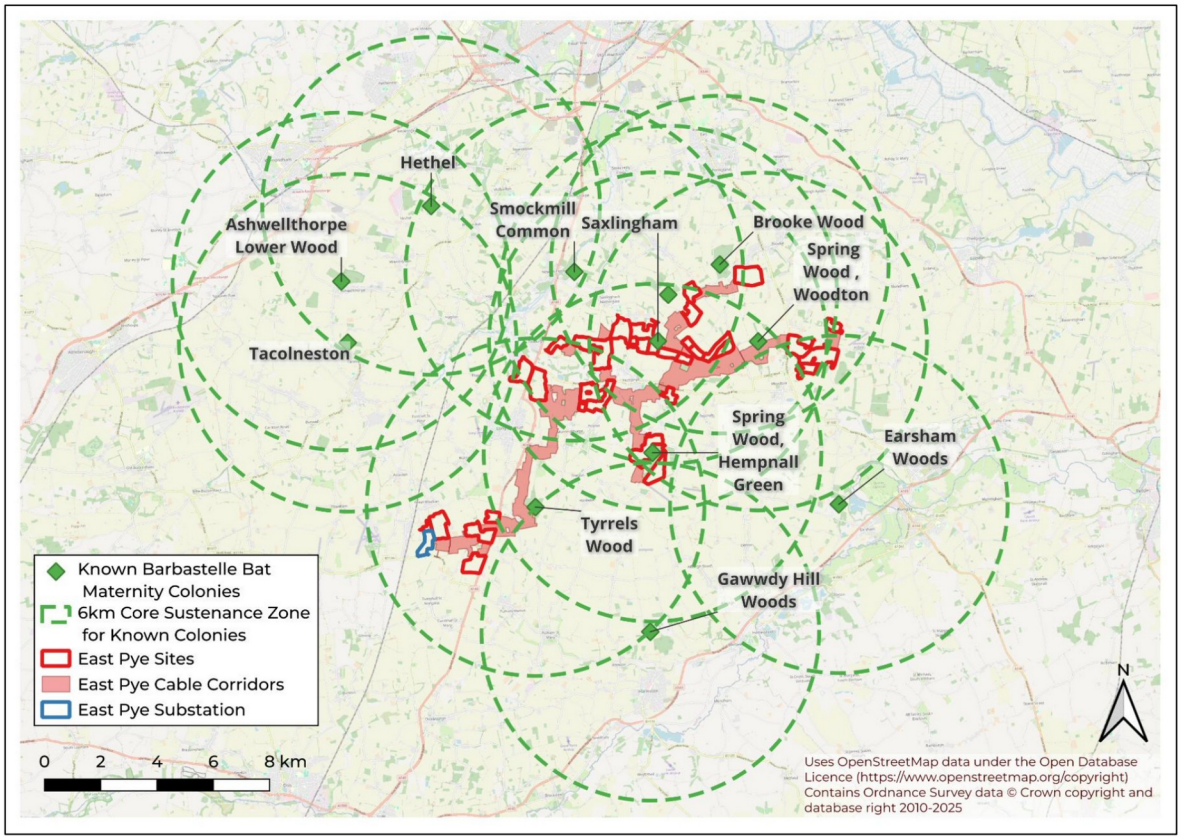


Figure 1. Core Sustenance Zones of Barbastelle Maternity Colonies within or close to the East Pye Solar Scheme Area

There are several old WWII bunkers running along the west side of Spring Wood along the entire length of the land parcel. These were converted into Bat hibernacula several years ago by the landowner, (of LP3, how times change. .) who specifically designated the area as a bat conservation area and even cited disturbance to bats as an objection to a previous planning application for the site.



WW2 bunker, now Barbastelle bat hibernacula

The construction and operation of large areas of solar panels, such as that proposed for LP3 is problematic for bats in several ways.

The noise, vibration, lighting, habitat fragmentation and general disruption caused by the construction phase would progressively impact their mode of living and their ability to feed. Quite possibly affecting the viability of the colonies' continued existence.

On completion, the solar panels' large reflective surfaces can confuse them and even, when horizontal, endanger them as they can mistake these reflective surfaces for a body of water and harm themselves.

Birds

Turtle Doves

Countryside Stewardship Scheme - Turtle Dove

Lapwing

Priority Area for CS Targeting - Lapwing

Grey Partridge

Countryside Stewardship Scheme - Grey Partridge

Birds - Farmland Birds -

Many species of bird are native to LP3. Some are on the red list and some on the amber list of endangered species. The solar scheme would be disruptive to their feeding and breeding areas. Some species are closely associated with farming practice, feeding on insects etc churned up by the plough and foraging over fields of crops.

Red List -
Grey Partridge
Turtle Dove
House Sparrow
Skylark
Greenfinch
Yellowhammer

Amber List -
Wood Pigeon
Black Headed Gull
Tawny Owl
Sparrowhawk
Kestrel
Rook
Wren
Song Thrush
Redwing
Dunnock
Bull Finch

Birds observed within 1.3 km of centre of area-
Chaffinch
Carrion Crow
Song Thrush
Fieldfare
Mistle Thrush
Song Thrush

Redwing
Barn Owl
Willow Warbler
Shelduck
Lesser Whitethroat
Blue Tit
Great Tit
Swallow
Pheasant
Robin
Blackbird
Yellowhammer
Whitethroat
Skylark
Rook
Chiffchaff
Swallow
House Sparrow
Dunnock
Starling
Pheasant
Red Legged Partridge
Lapwing
Wren
Tawny Owl
Redshank
Long Tailed Tit
Bullfinch
Green Woodpecker
Coal Tit
Wren
Magpie
Collared Dove
Goldfinch
Sparrowhawk
Brambling
Spotted Flycatcher
Jay

Greenfinch
Tree creeper
Great Spotted Woodpecker

Animals -

Deer and other animals live in and around Spring Wood and feed on agricultural land. They use the footpaths as access routes to other fields in their range. Fences would restrict where they could go. They wouldn't be able to leave Spring Wood anywhere on its considerable east side and be forced to risk the west side which has a busy road running near it and alongside it in places. Deer get hit by cars quite frequently, which is a danger to the public as well as to them.
Other animals' feeding behaviour would be disrupted if not entirely curtailed by the solar panel fields.

Hedgehog
Natterers Bat
Red Deer
Roe Deer
Muntjac

insects -

Surveys should be carried out to ascertain the extent to which rare and more common insects are present, and to determine the effect of the solar scheme on them and their habitat.

Southern Hawker
Migrant Hawker
Meadow Grasshopper
Roesel's Bush Cricket
Dark Bush Cricket
Common Green Grasshopper
Common Darter
Large White
Meadow Brown
Large skipper
Small Skipper

Ringlet
Small White
Green Veined White
Gatekeeper

8.6 Great Crested Newts

Almost the entire area of LP3 shows positive in the Great Crested Newts Strategic Operation areas (England) map - (source Magic Map)

Fringe 2 to Fringe 6. Core 3 to Core 6

There are Great Crested Newts in the general area covered by LP3. Photographic evidence of such exists. Surveys would have to have been carried out at the correct time(s) of year to determine their presence. There are many ponds in the curtilage of houses and farms in Lundy Green and beyond which should be surveyed for breeding populations.

The photos show Great Crested Newts present at Grove Farmhouse in Lundy Green. One of the houses affected by LP3 solar arrays etc.









8.7 River Tas – Protected Chalk Stream

Water draining from LP3, through ditches and watercourses flows eventually into the River Tas.

8.8 White Clawed Crayfish

A **watercourse runs through Land Parcel 3B**, forming a direct hydrological pathway to the **River Tas**, which supports **white-clawed crayfish** (a European Protected Species).

8.9 Hedgerows and Significant Trees

The proposed cable route could threaten hedgerows and several significant trees along its course. Its actual detailed course, if known, would determine which hedges and trees were endangered. The plans at present are unclear on this detail.

8.10 Rare Flora

Surveys of flora should be done to find and highlight any rare or endangered species that would be affected by LP3's change of use from agricultural to industrial

8.11 Inadequate Mitigation for Common Species

Many common farmland and garden birds, some on the amber and red lists, feed and nest in the hedges and field margins in and around LP3. There should be mitigation taken to protect them and their habitat.

There are common mammal species such as foxes, badgers, rabbits, voles, mice and deer in Spring Wood and in the surrounding fields and hedges. The transformation of LP3 into an industrial scale solar farm would disturb and disrupt their feeding and breeding irrevocably, especially the larger mammals such as Red Deer, a herd of which live in Spring Wood and feed in the fields near the south end of the wood. This herd, and Roe Deer and Muntjacs would have their movements restricted by fences and lights etc and their feeding grounds replaced by solar panel arrays. They may get driven out altogether. If so, where would they go? Foxes would be driven to forage in the gardens of the nearest houses, several of which keep chickens and are subject to occasional fox predation. This could get much more prevalent.

A survey of mammals, amphibians and reptiles should have been carried out.

Chapter 9: Water Environment

Introduction

9.1 Rivers, Streams, Ditches, Culverts

A watercourse runs through Land Parcel 3B, forming a direct hydrological pathway to the River Tas, which supports white-clawed crayfish (a European Protected Species).

9.2 Flooding

Flooding assessment should be carried out. The ground is prone to retaining surface water due to soil's high clay content.

9.3 Public Drinking Water Supplies

Risks to public drinking water supplies should be assessed

9.4 Private Drinking Water Supplies

There are several private drinking water supplies in the LP3 area, including wells

9.5 Drinking Water Protection Zone (SPZs)

Land parcel 3 is covered by a drinking water protection zone.

9.6 Contamination risks to Public and Private Drinking Water Supplies

The land has a history of military use, with associated risk of legacy contamination, including historic pollutants and firefighting foams. Ground disturbance would create a foreseeable risk of contaminant mobilisation into the Tas catchment.

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

See 9.6 except in reference to private water supplies, including wells.

9.8 River Catchment Area

LP3 is in The River Tas catchment area.

Chapter 10: Cultural Heritage

Introduction

10.1 Impacts to Conservation Area

10.2 Impacts to Setting of Conservation Area

10.3 Impacts to Grade 1 Listed Churches

10.4 Impacts to Grade II* Listed Buildings

10.5 Impacts to Grade II Listed Buildings

There are several Grade ll listed buildings in Lundy Green that would be affected by proximity to the solar scheme on LP3.

Three Feathers - 1151135



Barn and Stable Range Adjoining Three Feathers to the South West - 1050334



Rose Cottage - 1304365



Townhouse Farmhouse - 1153325



Chestnuts Farmhouse - 1373241



Hempnall House - 1262145



These would all be affected by noise during construction.

The larger solar panel field would be visible from the curtilage of Townhouse Farmhouse



View south from Lundy Green, from behind Grove Farm Barn. The solar panel array and fencing etc would dominate the horizon line and obliterate the view of Spring Wood

10.6 Impacts to Pre-Modern Agricultural Landscape

10.7 Archaeology

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

The solar array proposed for LP3 would also be visible from much of the quiet hamlet of Lundy Green which incorporates several listed buildings and several old, unlisted but significant buildings. A small, quiet country lane runs through it, crossed by footpaths and

bridleways and bordered by old hedges, ditches and many significant trees. LP3 is visible from many of the listed and unlisted buildings and their curtilage and forms part of the rural view they would normally enjoy, changing its rural character to that of an industrial landscape, drastically altering its historic rural context. For a community historically built around farming this is a drastic change of land use, and one that would have a deep impact on the well-being of the local community.

Chapter 11: Transport and Access

Introduction-

A project of this scale of this nature would generate considerable HGV and other traffic during the construction phase. This would have a deleterious effect on normal local traffic, slowing it down considerably or driving it down alternative routes, thus creating traffic problems elsewhere.

"Across the Site, we are forecasting the peak number of daily HGVs over the construction programme to be 48 one-way HGV movements per day (96 HGV movements taking into account arrivals and departures) for the solar sites and a peak of 20 one-way HGV movements per day (40 HGV movements taking into account arrivals and departures) for the Cable Route Corridor." - East Pye Solar website

11.1 Impacts on Road Network

There would be far reaching impacts on the local road system around LP3. Mainly through the construction phase where heavy lorries carrying everything needed to construct an array of hundreds of 4.5 metre high, tracking solar panels would traverse local roads many times a day over weeks or months. Impacts would also include transporting and siting of facilities for the workers and parking for the workers.

For LP3 the traffic would all travel, down the Alburgh Road, through Hempnall Green down to the access point on the right before Spring Wood. EPS states that no EIL traffic would be allowed down Alburgh Road but that HGV traffic would be allowed.



Alburgh Road Access

The physical impact on the local community would come mostly during the construction process, when the panels and transformers etc would be transported to the site. According to the map provided by East Pye Solar, this would be down the Alburgh Road, a road that is mostly just wide enough for a car to pass an HGV if one or the other hugs the side of the road. There is an access point on their map from this road into the smaller of the two fields that comprise LP3. From there, who knows what they are considering? The volume of traffic during this period would be considerable, disrupting normal life for both Hempnall Green and Lundy Green. Dog walkers, cyclists and horse riders use the Alburgh Road. It is also a bus route to and from Norwich and also to Harleston.

EPS also state that No HGV traffic will be permitted down Lundy Green Road, a narrow single track lane through the village of Lundy Green.

11.2 Proposed Road Straightening and Widening

Any plans for straightening or widening the road would have to have been consulted on with the Highways authority and local councils. Previous plans for widening Lundy Green Road were removed from the scheme as Lundy Green Road is not a permitted route for HGVs.

11.3 Impacts on Existing Traffic

The impact on local traffic down Alburgh Road (a small two way residential road) would be considerable. Access to Lundy Green would be complicated by traffic having to move to the sides of the road to let HGVs pass at all times of day. Access to Silver Green and Road Green would be similarly affected. The large strawberry growing concern, Berry Farm, situated over Spring Lane to the north of Spring Wood has lorry traffic to and from its site. Much of it along the Alburgh Road. The flow of goods in and out would be affected by LP3 traffic.

11.3 Impacts on Public Rights of Way

Footpaths potentially affected by construction traffic, as they join the Alburgh Road to the north, do not lie in the area defined by LP3, but would be adversely affected by construction traffic.

11.4 Impacts on Pedestrians and Children

The Alburgh Road as it runs through Hempnall Green, though not directly part of the LP3 site, will have to take the impact of all the construction traffic that will pass through it. Many dog walkers and pedestrians use the road and its verges at all times of day. This could become potentially hazardous with the amount of HGVs and cars often having to use the verges and driveways to let each other pass.

Horse riders use The Alburgh road through Hempnall Green very often. Horses would be terrified by HGVs passing them. Horse riders would likely try to find other places to exercise their horses, if they can, but this would be difficult for local people with horses.

Schoolchildren wait for the bus at the AlburghRoad/Silver Green crossroads on weekday mornings, some having to cross the Alburgh Road to get there. They make the return journey in the late afternoon. Heavy lorry traffic would make this hazardous.

11.5 Impacts on Cyclists

Cycling is popular on the roads and lanes around Lundy Green and the surrounding villages. The Alburgh Road is much used by cycle racing clubs and other cyclists. They are

in danger from irresponsible driving at the best of times, but with heavy construction traffic they will be even more vulnerable.

11.6 Parking for East Pye Solar Workers

Parking for EPS workers should be planned for and the relevant authorities and land owners consulted, including residents of nearby properties. The extra traffic from the workers will affect Cyclists and horse riders, as well as people walking. There are no footpaths, so families with small children and pushchairs and people with disabilities will be severely affected.

11.7 Local Bus Transport

A popular local bus uses Alburgh Road as part of its route between Harleston and Norwich, a few times a day. This route will be badly affected by such a large vehicle as a bus having to negotiate heavy traffic and increased traffic, on part of its route.

Schoolchildren and elderly people use this bus to get to school or to Norwich to go shopping, some having to cross the Alburgh Road to access the bus stop. Heavy HGV traffic would make this hazardous,especially for the young and for the less able.

11.8 Potential Impact on Rail Mainline

11.9 Impact on local Airfields

Chapter 12: Noise and Vibration

Introduction

Construction of a large array of solar panels would be noisy and disruptive. Shattering local peace and quiet and straining mental well being. Some residents run Air B&B businesses. Constant noise would completely ruin the premise of their business - a stay in the peace and quiet of the countryside. LP3 and the surrounding area is undisturbed by constant road noise and commercial airline traffic, especially overnight. Commercial flights are few and far between and are very high. Noise from farm traffic and tractors working the fields is sporadic and entirely acceptable in this context. Such a low level of noise is a rarer and rarer thing these days and should be preserved.

It will adversely affect the value of houses in the whole area, and make it probable that houses will be difficult to sell, during and after construction.

Impacts of Noise and Vibration on Residents' homes and businesses

During Construction

Driving metal piles into the ground to support 4.5 metre solar panels will be noisy to say the least, as will constructing concrete bases for the panel's support frames. This noise would go on all day (between 8 and 6 allegedly) for weeks if not months. The vibration caused by the pile driving could affect older buildings, especially those constructed using clunch or clay lump. The area around LP3 is particularly quiet and peaceful so even if houses are not directly abutting the site the noise will carry a considerable distance.

Any wildlife in the area will be disturbed and adversely affected.

The vibration will cause the ground to be unnaturally compacted, affecting flora and fauna. (Ref https://www.newcastle.edu.au/)

Pile driving causes significant, complex changes in clay soil, acting as a form of "compaction" or densification in the surrounding area. Driving displacement piles into clay increases the horizontal stress and density of the soil around the pile shaft and under the tip, often leading to increased soil strength over time.

Key Effects of Pile Driving in Clay:

- Compaction Zones: Driven piles create a zone of altered soil density extending roughly 6–7 pile diameters for single piles and 10–11 for group piles.
- Initial Strength Loss: In sensitive clays, the immediate impact causes large shear deformations, remolding the soil and significantly reducing its strength in the short term.
- Pore Pressure Buildup: Pile driving generates high excess porewater pressure, which causes the soil to temporarily lose strength.
- Long-Term "Set-Up": As the pore pressure dissipates (over weeks/months), the clay consolidates around the pile, often resulting in a final soil strength higher than the original undisturbed soil.
- Surface Heave: In soft to medium clays, pile driving can cause the ground surface to heave (rise) due to the lateral displacement of soil.

During Operation

The solar panels are tracking panels, moving to track the sun as it moves across the sky. The motors that power this movement will inevitably make noise, which may be audible from a distance. This noise would be constant as the sun is never still.

The large inverters used, make a noise, (from cooling fans, magnetic components in transformers, and electrical switching components working to convert high volumes of DC to AC electricity) They will primarily emit a low-frequency, 120 Hz humming or buzzing sound during daylight hours. This would be around 60 dB (the sound of a normal conversation) at close range. It will affect wildlife and people using the countryside for recreation.

During Decommissioning

Whenever decommissioning happens it will be noisy and disruptive, just as much as during construction.

Adverse mental and physical health

During Construction

Anyone living within earshot of the construction of this solar scheme will have no escape from the noise. They will have no escape from the knowledge that this disruption to their daily life is caused by a bigger disruption, an unwanted, unwelcome intrusion into their world. Each blow of the pile driver emphasising how powerless they feel in the face of what seems to be an evident wrong. How they weren't listened to and are rendered irrelevant in the face of a faceless organisation determined to, as the local community see it, spoil their beloved countryside despite their objections. And all in order to make money for large foreign bankers who are happy to use their wealth and power to try to influence government decisions. There is strong evidence that Island Green Power has been lobbying the government to this end.

I know people who are now on anti-depressants due to their despair at what is potentially being permitted.

During Operation

The presence of the completed Solar 'farm' doesn't dispel such despair and anger. It just reminds people of what has been lost. Mental well being is unlikely to be recovered in this situation, especially if constant noise from the panels and inverters is the daily reality

During Decommissioning

Many of the affected people will be dead by the time decommissioning comes round. Decommissioning will be just as disruptive as construction. The cause of worry would be the state of the land, which would be unlikely to be farmed again as it would be contaminated and compressed etc, leaving it open to being used for other purposes equally out of character with its rural setting. A depressing thought becoming a depressing reality.

The effect of noise and vibration on Wildlife

During Construction

Barbastelle Bats

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**.

Birds

Surveys should have been carried out to determine the presence or otherwise of breeding populations of red and amber listed birds.

The noise and vibration during construction, operation and decommissioning would negatively affect their ability to breed successfully and would drive many species away.

Impact of Vibration on Timber-framed and Clay-lump buildings

Impact of Vibration on other Vulnerable Structures

Chapter 13: Air Quality

https://www.phlorum.com/

Air quality on countryside construction sites is heavily impacted by particulate matter (PM10, and PM2.5) dust, and Nitrogen Dioxide (NO_2) from heavy machinery, excavation, and material transport. Rural sites often face specific challenges related to dust management and the potential for pollution to settle in low-lying areas or affect sensitive, undeveloped ecosystems.

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 NO_2 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

14.1 Impact to tourism

During construction it is less likely that people will want to visit the area with all the major disruption. The same is true after construction as the countryside will be industrialised and not what people visit the area for.

14.2 Impact to home values

The impact on home values would be immense. Until a decision is made for or against East Pye Solar's plan, homes in the area of LP3 are to all intents and purposes, unsaleable. Estate agents advise that to find a potential buyer as things stand at present (Feb 2026), prices would have to come down around 15% at least. As long as the uncertainty over the government's planning decision continues, little to no activity in the local housing market will take place. At present (feb 2026) the housing market in this area is static.

Even if the scheme is approved, and until it is completed, estate agents say that the same advice stands.

Once actually constructed, prices could rise somewhat, as potential buyers would be aware of the solar farm and could make a decision based on that solid fact. It could still be a loss of around 10% compared to the price before the solar scheme was hatched. .

That is a considerable amount of money. There is no available compensation available for home owners, we are supposed to just shut up and take it.

Talk of buying or selling houses is moot if the market is flat. The other aspect to a home's value is its value to its owners/residents. Their freedom to relocate is hugely diminished if they can't sell their homes until such time as the solar scheme is completed. This could take several years, during which time they are essentially trapped in their homes. They could be in declining health and wishing to relocate to a more manageable property, or a family could be expanding and wishing to move to a bigger property. Whatever the reason might be to relocate, it will be virtually impossible until decisions are made concerning the solar farm on LP3.

14.3 Cumulative Impact of all proposed development

The other valuable commodity the area around LP3 has to offer is peace and quiet. It is undisturbed by constant road noise and commercial airline traffic, especially overnight. Commercial flights are few and far between and are very high. Noise from farm traffic and

tractors working the fields is sporadic and entirely acceptable in this context. Such a low level of noise is a rarer and rarer thing these days and should be preserved.

Impact on Local Community

The impact of LP3 on the local community will be both physical and mental, and is not just the obvious impact the disruption caused by the construction and operation of the Solar Array and its substation would bring, but by the anxiety and often despair caused by the continuing uncertainty about the future of this scheme and consequently the future of a much loved environment and landscape.

Mental impact This uncertainty begins the moment such a scheme is proposed, (exacerbated in the case of LP3, by the insensitive way in which this was done), continues through the long drawn out planning and approval process (can be years) and if approval is gained despite impassioned protests, the uncertainty turns into anxiety (if it hasn't already done so) which could easily turn to despair and depression as the construction and destruction process begins. (which could also take years)

Those wishing to escape the effects of the solar scheme by relocating will find themselves trapped in their homes (possibly for years) by a static housing market, caused by the uncertainty about the solar scheme's future or lack of same. This would be very bad for their mental health and could cause severe anxiety and depression.

An undisturbed view over a natural or agricultural landscape and a walk in the same has been proved to contribute very positively to people's mental health and consequently their happiness. Take that away, or even put the possibility of access to such an experience in doubt and anxiety and stress are likely to increase leading to a decline in mental health and well being.

Chapter 15: Soils and Agriculture

Introduction

“Ignoring the impact of solar installations on soil quality can have serious long-term consequences. Soil degradation can lead to reduced agricultural productivity, increased erosion and sedimentation, loss of biodiversity, and impaired ecosystem services. Addressing these challenges requires a holistic approach that integrates environmental considerations into all stages of solar energy development.

To elucidate the academic sense of solar land pollution, we must recognize its departure from conventional pollution paradigms. It is not solely defined by the presence of pollutants, but by the systemic alterations to ecological processes and land system functions. The significance here is profound: it shifts the focus from point-source contamination to landscape-scale ecological disruption.”

15.1 Impact of Solar infrastructure on Soil Quality

Over time, solar installations can lead to several changes in soil properties. Shading from the panels can alter soil temperature and moisture levels, affecting the microbial communities that are essential for nutrient cycling. The reduced sunlight can also inhibit the growth of plants beneath the panels, leading to changes in soil organic matter content.

The presence of solar panels can alter the soil’s chemical composition. Reduced rainfall reaching the soil beneath the panels can decrease leaching of nutrients, potentially leading to an accumulation of salts and other minerals. Conversely, in areas with high rainfall, increased runoff from the panels can lead to increased erosion and nutrient loss in surrounding areas.

Soil microbial communities are vital for maintaining soil health. They play a critical role in nutrient cycling, decomposition of organic matter, and disease suppression. Changes in soil temperature, moisture, and sunlight can significantly affect these communities.

Studies have shown that shading from solar panels can reduce the diversity and activity of soil microbes, which can have cascading effects on plant growth and soil health.

15.2 Soils and Compaction

The immediate impact of solar installation on soil can be quite disruptive. The removal of vegetation leaves the soil exposed, increasing the risk of erosion by wind and water. Heavy machinery compacts the soil, reducing its porosity and ability to absorb water.

This compaction can also hinder root growth and reduce the availability of nutrients for plants.

15.3 Soils and Contamination

WW2 - possible soil contamination etc

Much of the area covered by the woodland to the east (and part of LP3) was very different in World War II. It was an American bomber base and remnants of the buildings and shelters still exist amongst the trees. There is concern about the possibility of unexploded ordnance under the north east part of LP3 where it adjoins the wood, as that was where the bomb store was said to be located. There is also concern about any contamination still held in the soil leaching out into the water supply and general environment if the soil is disturbed.

While generally cleaner than fossil fuel infrastructure, solar farms can still contribute to chemical pollution. This includes runoff from panel cleaning agents and potential leaching from damaged panels (especially older technologies).

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.

15.4 Impact of Microcracking, Leaching, Glass

Micro cracks in solar cells are a frequent and complicated challenge for manufacturers of solar photovoltaic (PV) modules. While it is difficult to assess in detail their impact on the overall efficiency and longevity of a solar panel, they are one of the main sources of malfunctioning or even inactive cells. However, micro cracks are nearly impossible to avoid and – in the long run –will affect most solar panels, including high-quality panels. They are triggered by mechanical and chemical environmental factors causing stress to the panel operating in the field, such as hail, snow, sun, wind, and severe coldness. Further stress factors are geared to the thermal cycles of the cells involving contracting, expanding, and flexing metal contacts, solder, and wire interconnect.

15.5 Lack of Land Management Detail

Careful management is essential to minimize chemical risks. EPS should outline how they intend to carry out this management and maintenance.

15.6 Soil Recovery Plan

EPS should have a detailed soil recovery plan for when the Solar Farm is decommissioned and taken down

15.7 Lack of Decommissioning Bond

Chapter 16: Ground Conditions

Chapter 17: Electromagnetic Fields

The potential impacts of electromagnetic fields on the area and its surroundings needs to be researched and any necessary action taken in the light of the conclusions of such research. It potentially can affect living beings and can affect safety and navigation equipment on nearby airfields.

Impacts of EMF Radiation on:

17.1 Residents

17.2 Children

17.3 Bats

17.4 White-Clawed Crayfish

17.5 Airfields

Poorly wired cable looms are a prime source of interference. Certified inverters can, despite their certification, still generate interference at various frequencies. The frequency range that is most susceptible to interference is 100 to 200 MHz which may affect aeronautical radio frequencies dependent on the location of the development. Aerodrome operators should assure themselves that there is no risk of electromagnetic interference affecting any part of their ATS infrastructure (if applicable).
(Renewable energy developments: solar photovoltaic developments CAST Aerodrome Safeguarding Guidance Note)

Chapter 18: Other Environmental Matters

18.1 Utilities

High pressure gas main

Glass Fibre Broadband

Gas pipes

Water and sewage pipes

18.2 Major Accidents and Disasters

18.3 Glint and Glare

Airfields

A key safety concern when considering a solar photovoltaic panel development on- or off-aerodrome is related to the reflection of sunlight off the photovoltaic panels commonly referred to as glint and glare.
'Glint and glare' is the general term used to describe the reflection of sunlight from a reflective surface, typically one that is capable of producing specular solar reflections.
The definition of glint and glare is as follows:
• Glint – a momentary flash of bright light typically received by moving receptors or from moving reflectors.
• Glare – a continuous source of bright light typically received by static receptors or from large reflective surfaces.
Typical surfaces that are considered with respect to glint and glare are glass, metallic structures e.g. roofs, and solar PV panels. The orientation of a solar panel (azimuth and elevation angle) as well as its height will determine whether glint and glare effects are possible towards the assessed receptors.
The receptors that should be considered are usually ATS personnel in a control tower and pilots of aircraft within a suitable distance of an aerodrome. It is essential to conduct a glint and glare assessment when a reflective surface is to be located on or immediately adjacent to an aerodrome. In most cases, an assessment should be undertaken for a solar PV development which is being proposed within a specific distance (indicated by the aerodrome authority) from an aerodrome. For many

aerodromes, 5km is the distance of choice but it could be considered out to 10km. In exceptional circumstances, assessments may be required beyond 10km.

(Renewable energy developments: solar photovoltaic developments CAST Aerodrome Safeguarding Guidance Note)

The aerodrome operator in conjunction with any ATS personnel should, as part of the change management process in their safety management system, consider all the potential hazards posed by solar photovoltaic developments / BESS on or in the vicinity to their aerodrome and within the aerodrome's physical and technical safeguarded areas, in order to ensure the safety of the overall operation. The developer should provide the aerodrome with a safety survey which should include:

- a glint and glare survey when a development is within a distance specified by the aerodrome from an Aerodrome Reference Point (ARP) (5km in most cases)
- impacts to CNS facilities (if applicable) up to a distance specified by the aerodrome (typically 6km) from the ARP
- a wildlife hazard safety survey.

In addition to the safety survey, developers should provide the aerodrome operator and / or ATS provider with adequate technical and safety assurance documentation which addresses the safety impacts provided in sections 3.1 to 3.6. Further consideration may be given to the following:

- turbulence
- thermal plume
- 1000m off aerodrome RFFS response areas
- access routes for fire and rescue vehicles
- passenger evacuation
- damage to aircraft slides impeding passenger self-evacuation
- electrical hazards
- interference with CNS equipment and meteorological equipment
- HV cable routes which may interfere with compass swing bases or other sensitive items
- any lighting employed on the development (confusing lights)
- frangibility of structures where required
- site fire risk and prevention measures

(Renewable energy developments: solar photovoltaic developments CAST Aerodrome Safeguarding Guidance Note)

Roads

Homes

Chapter 19: Cumulative and In-Combination Effects

Cumulative impact of this land parcel with cable corridors

19.1 Other near-by developments (solar, housing, energy infrastructure)

19.2 Cumulative impact on landscape and visual



A view looking south from Lundy Green Road at the eastern part of the village to the site of the EPS solar array which would be situated just past the hedge and the line of trees on the other side of this field. The proposed cable route joining LP3 to the next land parcel would cross this field towards the viewer and then cross the Lundy Green Road (at roughly this point, though no actual detailed route has been proposed). From then it would continue north towards Hempnall across the large field you see, (looking north from Lundy Green Road, opposite the viewpoint of the previous shot) and across the next field to the north, almost as far as Hempnall.



The construction of this cable route, (however that is achieved with no HGV access allowed on the only viable access roads) would just add more noise and disruption to the local community. Spreading the disruption to those living on or near the cable route who might have avoided some of the nuisance caused by the construction of the Solar Array on LP3, and on other land parcels in the overall scheme.

The construction of the cable corridor.

There will need to be a "Haul Road' built to carry the lorries containing the materials necessary for the construction of the cable corridor, as the small rural roads which might have been considered as points of access have been ruled out. This haul road would be a major construction, following the route of the cable corridor. Obviously this would be another major disruption to the area, its land and the properties near it, bringing noise, traffic disruption at road crossing points and disturbance to wildlife etc.

19.3 Cumulative impact on ecology

The construction of the parts of the cable corridor that cross LP3 would add to the negative effect the solar array construction would already have had on the local environment and

ecology. Hedges would be removed at certain locations, trees may need to be felled. Water courses and drainage ditches contaminated or altered.

Though the cable route would be underground and covered over eventually, the construction would disrupt a much wider area than the few metres the actual cable would take up. Heavy machinery would be needed to dig the trenches etc, the soil surface would be churned up and/or compressed, and fencing would likely be needed to preserve the site's integrity and safety for the public during construction.

This would disrupt wildlife in areas that had so far avoided the disruption caused by the solar array's construction. So a double blow for the local ecology.

19.3 Cumulative impact on heritage

19.4 Cumulative impact on Transport and Traffic

I think this quote says it all.

"Across the Site, we are forecasting the peak number of daily HGVs over the construction programme to be 48 one-way HGV movements per day (96 HGV movements taking into account arrivals and departures) for the solar sites and a peak of 20 one-way HGV movements per day (40 HGV movements taking into account arrivals and departures) for the Cable Route Corridor."

(from the east Pye Solar website)

It is hard to say what percentage of those HGV movements would be for LP3, but as each site would be made one by one as opposed to all at once, it would still be a considerable amount of new traffic on local roads.

Getting cable drums to the required localities is another problem as some cable transport lorries are larger than HGV and would be very restricted in where they could physically go. Any attempts at road widening to facilitate access etc would be hugely disruptive. And as mentioned before, HGV access for East Pye construction traffic is not permitted on any road smaller than a B road so getting the relevant equipment to the desired location on existing roads looks like an insurmountable problem.

19.5 Cumulative impact of Noise and Vibrations

The construction of the parts of the cable corridor that cross LP3 would add to the negative effect the noise and vibration caused by solar array construction would already have had on the local environment and ecology. Taking the disruption along the cable route with it to hitherto unaffected members of the community.

19.6 Cumulative impact on air quality

19.7 Cumulative socio-economic impact

19.8 Cumulative impact to soils and agriculture

Though the cable route would be underground and covered over eventually, the construction would disrupt a much wider area than the few metres the actual cable would take up. Heavy machinery would be needed to dig the trenches etc, the soil surface would be churned up and/or compacted, which would make it hard to bring the land back to its previous standing as high quality farmland. It is debatable whether the land can be ploughed/farmed conventionally after the cables have been buried and infilled. If this was not possible it would create uncultivated areas stretching across entire fields. LP3 has a couple of fields that would be affected.

19.9 Cumulative impact to ground conditions

19.20 Cumulative impact of EMF

19.21 Cumulative impact to utilities

19.22 Cumulative impact of major accidents and disasters

19.23 Cumultive impact of glint and glare

Conclusion

My conclusion is that this project, specifically as it pertains to site 3 is flawed in many ways and should not be approved. My objections are as follows -

1. **Disruption and loss of habitat**. - Barbastelle Bats, Great Crested Newts and White Clawed Crayfish. Red and Amber listed bird species.
2. **Contamination of water supply** due to soil disturbance. Many houses having their own groundwater supply. Contaminants would also find their way into the River Tas via smaller watercourses and ditches with the negative effect that would bring to a fragile habitat.
3. **Possible presence of unexploded ordnance** as part of site 3 was a WW2 Airfield bomb dump.
4. **Ancient woodland** wildlife and habitat at risk of disturbance due to proximity of solar panels, particularly affecting Barbastelle bats who feed and forage over site 3 and more generally over the entire area of the scheme.
5. **Disruption to road traffic and danger to pedestrians, (including school age and elderly bus passengers), and to cyclists and horses** during the construction process due to HGV deliveries to site and due to a general rise in traffic due to workers arriving and leaving etc.
6. **Noise and vibration during construction**. Pile driving can cause noise nuisance and vibration that could negatively impact nearby properties.
7. **Drastic change of land use** from historically agricultural to modern industrial should be unacceptable.
8. **Soil degradation** due to compaction, contamination and degradation due to lack of continuous cultivation.
9. **Loss and degradation of footpaths** due to fencing in and close proximity to large scale solar infrastructure rendering them almost entirely joyless places to exercise dogs and attempt a country walk.
10. **Degradation of amenity value** due to rural views across open countryside being replaced by views over a hard-edged, unforgiving industrial landscape.
11. **Negative impact on mental health is a major issue**. The government allowing and encouraging outside agencies to despoil the countryside for profit and sidestepping valid protest in the name of ‘national security’ leading to feelings of anger, helplessness and despair, and to anxiety about the future.

12. **Negative impact on property prices** by as much as 15%, as a desirable rural area becomes far less desirable as it is turned from rural to industrial. No compensation is offered, we are supposed to just take it.
13. **Properties in the area becoming unsaleable** as buyers, sellers and estate agents wait for prices to stabilise. For this to happen, they need to see if the scheme is approved, and if it is approved, wait until the scheme is completed, which could take around three years.
14. **Homeowners who wish or need to relocate or upsize/downsize** in this time period are essentially trapped in their own homes until the scheme is completed and the market settles.
15. **Airfields have concerns** over glint and glare and availability of emergency landing areas potentially lost to solar panel arrays.
16. **The Mock-up photographs in the submission document for site 3** do not show the view from the west over the smaller of the two fields towards the Alburgh Road. This is the view from the curtilage of Grove Farmhouse, and nearer the field, the view from the north/south footpath to/from the corner of Spring Wood. It is unclear if there is a mitigation strip between the solar panels and fencing and the hedge and ditch alongside the footpath. There should be at least 15 metres of clear land between the fencing and the footpath.

My personal objection -

Alongside the concerns expressed above, there are concerns about the underlying reasons for this scheme. The reasons put forward by the government and the Secretary of State are open to question to say the least. Saving the planet by supplying renewable energy is the ostensible aim but set against this is the fact that a major multinational Investment company, Macquarie is behind the companies building this solar scheme. They would certainly not be involved unless big profits were going to be made. So our good quality agricultural land is being taken out of food production to make room for solar factories (not farms) that financially benefit multinational investment companies, not the people of the UK. This is all at the expense of our precious farmland, countryside and rural way of life. Not to mention our food security, which should be a concern.

Landowners are also being generously compensated for giving up their land. To the tune of (allegedly) £1000 an acre per annum for the duration of the scheme which could be around 60 years. They are selling out their neighbours for financial gain. What they seem not to realise is that the land they are leasing is likely (allegedly) to be the subject of compulsory

purchase, that being a cheaper option for the investors and would result in them owning the land in perpetuity. Large areas of UK farmland being owned by the worst kind of absentee landlord with profit as their only motive is an uncomfortable thought.

The other unjust and unfair aspect to this scheme and others like it is their definition as Nationally Significant Infrastructure Projects (NSIPs) which defines them as matters of national security rather than local planning issues. This conveniently bypasses local planning and lets decisions to allow or turn down applications that qualify rest with the Secretary Of State alone. This is undemocratic and open to unfair and autocratic decisions being made without recourse to appeal (unless you can afford the legal cost of a judicial review, which is not cheap and unlikely to be positive in this political climate). There are those that believe the authorities involved are under pressure from higher authorities to give the OK to these Solar Farm plans as to do otherwise embarrasses the government and would scupper the unrealistic ‘Net Zero’ plan they are desperate to enact. They in turn could (allegedly) be being ‘leaned on’ by even higher authorities such as the World Economic Forum, who are pushing net zero by 2030. So we are minor players in this drama. But we fight on.