

Objections submitted in response to East Pye Solar

PINS Reference: EN0110014

Land Parcel 6

Submitted by BEPS (Block East Pye Solar

Executive Summary

Land Parcel 6 is **undeliverable in principle**. The Applicant relies on this parcel simultaneously as a **construction compound** (with heavy plant, storage, traffic and disturbance) and as **ecological and landscape mitigation land**. These roles are **mutually incompatible** and expose a fundamental internal contradiction within the scheme.

In addition, Land Parcel 6 is subject to **severe residential proximity impacts**, high **heritage sensitivity**, proximity to **SSSIs and priority woodland**, location within **high water-quality protection zones**, and the loss of productive agricultural land. These constraints are **front-loaded and non-mitigable**.

It is not clear how site 6 will be developed as a construction compound – for example, whether it will be tarmaced for vehicle access, whether buildings will be constructed on it or storage compounds. It is unclear how contamination, compaction and other changes to this site caused by its use as a construction compound will be remedied in order to convert it into a biodiversity mitigation area.

The impact on the surrounding Grade II* and Grade II Listed Buildings of this development of the land as a construction compound should also be assessed. If diesel generators are used or other potential fire hazards, this could have a serious impact on the timber-framed and thatched listed buildings which surround this site. No risk assessment has been carried out. Equally the vibration caused by HGVs in close proximity to these fragile buildings without modern foundations, and changes to water infiltration on the field caused by making it capable of carrying traffic, may also have a detrimental affect on the surrounding listed buildings. This has not been assessed.

It is also unclear whether site 6 will be reused as a construction compound again during the lifetime of the project for replacement of solar panels. This would destroy any BNG benefit. It would again have an impact on the surrounding Listed Buildings.

It is again unclear whether it would be reused as a construction compound for decommissioning, and again the impact on BNG and the habitats in theory created. Again another impact on the Listed Buildings and wider ecology of the area including bats.

If decommissioning is undertaken by individual farmers, as the applicant suggests, it is unclear how the function of sites which were once compounds for construction but which

are owned by farmers not requiring to decommission their land, would be replaced by other farmers involved in the scheme. Would other land used either for mitigation or outside the order limits then have to be industrialised for this purpose.

1. Internal scheme contradiction: construction compound vs mitigation land

The Applicant proposes to use Land Parcel 6:

- as a **construction compound**, accommodating heavy machinery, materials storage, vehicle movements, noise, lighting and prolonged disturbance; and
- as **mitigation land**, intended to offset ecological and landscape harm arising elsewhere in the scheme.

These two functions are **inherently incompatible**. Land subject to:

- repeated compaction,
- disturbance,
- lighting,
- vehicle movements,
- and potential contamination

cannot lawfully or credibly function as mitigation, particularly for sensitive receptors such as nearby woodland, protected species, water quality and residential amenity.

This contradiction demonstrates that:

- mitigation is **illusory rather than real**;
- mitigation claims are not deliverable in practice;
- the scheme fails to demonstrate internal coherence.

This flaw alone is sufficient to render Land Parcel 6 **undeliverable**, and undermines mitigation claims across the wider scheme.

2. Proximity to residential properties – unacceptable amenity harm

Land Parcel 6 is bordered along its southern edge by approximately **20 residential properties** on Silver Green (formerly Furze Lane). Some dwellings lie **as close as 60 m** to the parcel boundary, with a farm bungalow less than **20 m** from the north-eastern edge.

As a construction compound, the site would generate:

- prolonged noise and vibration;
- HGV movements;
- lighting and security activity;
- dust and air quality impacts.

These impacts would be **unavoidable, sustained and severe**, and fundamentally incompatible with residential use at this proximity. The surrounding communities of Hempnall Green, Silver Green, Road Green and properties along the B1527 would be cumulatively affected, particularly in combination with other East Pye parcels.

Mitigation through screening or timing restrictions is **not credible** at this scale.

3. Heritage harm – setting of listed buildings

There are **three listed buildings within 100 m** of the southern boundary of Land Parcel 6:

- **Poacher's Cottage** (Grade II*, late C16 / early C17, thatched) – approx. 60 m;
- **Wodehouse Farm** (Grade II*, early C16 hall house) – approx. 80 m;
- **The Firs** (Grade II, C17 hall house) – approx. 100 m.

A further **14 listed buildings lie within 1 km**.

The construction compound and any associated permanent infrastructure would:

- introduce industrial activity into the immediate setting of highly sensitive heritage assets;
- erode historic rural character;
- cause harm to significance that **cannot be mitigated**.

The PEIR does not provide a lawful heritage impact assessment for this parcel, nor does it address the compounded harm arising from construction use.

4. Proximity to SSSIs, priority woodland and woodland networks

Land Parcel 6 lies within close proximity of:

- **Little Wood SSSI** (approx. 960 m to the NNE);
- **Shotesham–Woodton Hornbeam Woods SSSI** (approx. 1.25 km to the NE);
- priority deciduous woodland and woodland networks within **80–100 m** of the parcel boundary.

As a construction compound, the site would generate:

- noise and vibration;
- lighting disturbance;
- dust deposition;
- hydrological disruption.

These impacts present a **foreseeable pathway of harm** to SSSI integrity and priority woodland habitats. Reliance on this land for mitigation in such circumstances is **self-contradictory and unlawful in principle**.

5. Water environment and pollution risk

Land Parcel 6 lies within:

- **high-priority water-quality protection zones;**
- **a high-priority phosphate catchment.**

Evidence of water pooling along the northern edge of the parcel demonstrates poor drainage and heightened sensitivity to compaction and runoff.

Use of the site as a construction compound creates:

- increased sediment mobilisation;
- pollution risk from fuels, oils and materials;
- altered surface water pathways.

These risks directly undermine both **environmental protection objectives** and the claimed mitigation role of the site.

6. Ecology and protected species sensitivity

The parcel lies within a landscape supporting:

- red-listed plant species (e.g. *Euphorbia amygdaloides*);
- red-listed and amber-listed birds;
- invertebrate assemblages of conservation concern;
- hedgehogs and other protected fauna.

Construction-phase disturbance is incompatible with the retention or enhancement of these features. The Applicant's reliance on this parcel for mitigation is therefore **not credible**.

7. Agricultural land and irreversibility

Land Parcel 6 is actively and successfully farmed arable land, with a long and continuous cropping history.

Compaction and disturbance from construction compound use would result in **irreversible soil damage**, rendering subsequent restoration or mitigation claims unreliable.

Overall conclusion – Land Parcel 6

Land Parcel 6 fails on multiple, overlapping and reinforcing grounds:

- an internal contradiction between **construction compound use and mitigation function**;

- unacceptable proximity to residential properties;
- harm to the setting of listed buildings;
- proximity to SSSIs and priority woodland;
- high water-quality and pollution risk;
- ecological sensitivity;
- irreversible agricultural land damage.

These are **front-loaded flaws**, not matters capable of resolution through conditions or examination.

Conclusion

Land Parcel 6 is undeliverable in principle.

Its inclusion further demonstrates that the East Pye Solar scheme relies on **theoretical mitigation that cannot function in practice**, reinforcing the conclusion that the scheme as a whole is **incapable of lawful delivery**.