Hempnall Parish Council

Written Representation in regard to the application by East Pye Solar Ltd for an order granting development consent for the East Pye Solar project (EN0110014). This representation includes a Landscape and Visual Impact Case covering impacts over the whole scheme area and cumulative impacts over the wider area

1.0 Background

When registering as an Interested Party Hempnall Parish Council stated in its Relevant Representation that:

"The development would industrialise large areas within our parish and the surrounding villages, transforming attractive tranquil rural countryside into a landscape dominated by solar panels up to 4.5m in height, security fences and cameras, inverter buildings, new tracks and roadways and substations."

And that:

"This magnitude of negative change is unacceptable. The scheme stretches for over 15km from Great Moulton/Tivetshall to the southwest to Brooke/Seething to the northeast. Our village is located in the middle and would be completely surrounded by solar infrastructure. A large tract of South Norfolk Countryside would be altered for decades and its character destroyed."

In this Written Representation Hempnall Parish Council (HPC) provides a full, detailed Landscape and Visual Case which expands and explains in detail these impacts within the scheme area and over a wider area within South Norfolk

Also included are more detailed comments on other aspects of the scheme that were referenced in the Relevant Representation.

2.0 Hempnall Parish Council - Landscape and Visual Impact Case (LVI Case)

2.1 Methodology

This LVI Case was prepared by 2 volunteers [redacted], Chairman of Hempnall Parish Council and [redacted] with assistance, advice and input provided by [redacted] Landscape 2b Consultancy.

The LVI Case is rooted in research carried out in the field. It does not rely on AI sources. The authors have conducted numerous site visits to all of the sites involved in the scheme

researching, photographing and assessing Landscape and Visual effects. This work included walks along all the Public Rights of Way (PROW) that cross or are alongside proposed solar sites and has enabled informed, detailed and accurate assessments to be made regarding impacts on the views currently enjoyed by users of PROW over the whole scheme area.

Detailed evaluation of current views, potential changes to views after construction (Year 1) and later (Year 15), for a selection of these walks is included in the LVI Case and is supported by maps, viewpoint analysis and photographs **(see footnote *)** . These walks are called Narrative Walks and the full assessment of one of these walks (close to Saxlingham Green) is included in the Appendices attached to this Written Representation (HPC – APP03 – Narrative Walk 7ii).

The authors have also produced a clear detailed map of the whole scheme presented on an OS 1:25,000 background map. This map facilitates an immediate and accurate understanding of the location of the proposed developments in sharp contrast to the maps supplied by the applicant which contain numerous inaccuracies and which obscure background details.

Other maps produced specially for the LVI Case include:

- A cumulative impact map covering a large section of South Norfolk
- A tranquility map based on the CPRE tranquility map which clearly shows the sites and uses the correct CPRE legend – unlike the map provided by the applicants
- A Maps showing the routes of the Narrative walks

The LVI Case uses the evidence provided by these maps as part of the assessment of cumulative impacts and impacts on tranquility and PROW.

The LVI Case considers the inter-project, intra-project and in combination cumulative impacts that would result if the East Pye scheme was permitted.

The East Pye scheme includes 10 sites – 9 of which would be filled with solar infrastructure. Each of these is a major development in its own right and many of the individual East Pye sites are far larger than existing permitted sites in South Norfolk – e.g. Site 7 dwarfs the 200 acre Bloys Grove development in nearby Swainsthorpe. The combination of 9 large East Pye sites being built within the scheme area is a major cumulative impact in its own right.

Landscape and Visual effects resulting from the large number of modifications to local roads to accommodate construction vehicles are also considered as well as the impacts of the numerous indicative access points that are shown on the applicant's section maps. These would alter the character of the landscape and the views experienced by users of PROW and minor roads.

In its Relevant Representation HPC stated that its written representation would: *"provide greater detail on how the scheme contradicts policies and assessments made in local and national planning documents including the NPPF, the Greater Norwich Local Plan (GNLP) approved by PINS, South Norfolk Council landscape character assessments and sensitivity studies on the location of renewable energy projects including solar."*

The HPC LVI Case considers all these relevant policies and guidance documents in its assessment of the planning balance.

When considering ES landscape and visual assessments Hempnall Parish Council focuses on a comparison of the ES assessments of the level of significance of effects with our own field work based assessments.

Hempnall Parish Council does not have the resources to conduct a full Landscape and Visual Impact Assessment (LVIA) but we are very confident that our assessments of effects, based on field work and detailed local knowledge, provides conclusions that are robust and accurate.

We asked 2B Landscape Consultancy to look at the ES Methodology (ES Appendix 7.1) as applied to the LVIA, to understand why it appears that ES LVIA assessments generally reach lesser conclusions, about landscape and visual effects, than Hempnall Parish Council considers would be appropriate for a development of this scale and character, within the South Norfolk landscape. Their review is provided in our appendices (HPC App 08: Review of ES/LVIA Methodology regarding Landscape and Visual Sensitivity and Magnitude, and Significance of Effects)

Also in our appendices is another relevant document regarding ES methodology - HPC App 09 - Summary of Residual Landscape and Visual Residual Effects (extract of ES Vol 1. Ch 20).

Footnote *

At the Preliminary Meeting held at Dunston Hall on September 15th 2026 Mr Hook explained that collating and presenting all the supporting information and evidence, including relevant maps and photographs, relating to its field work and walks' assessments was a major task and: *"it was agreed that Hempnall Parish Council would provide their written representation by deadline 1 but would provide additional supporting information including maps and photographs at deadline 2"* (see Preliminary Meeting Note Section 6 Examination Timetable).

This Written Representation covers our overall field work conclusions on landscape and visual effects. Additional supporting information, including tables with maps and photos of all our Narrative Walks, will be provided by deadline 2. Mr Hook explained at the Preliminary meeting that this supporting information included evidence that backed up the conclusions presented in the Written Representation.

2.2 Relevant National and Local Policies, Landscape assessments and guidance notes

These include:

- National Planning Policy Framework (NPPF) - Plan-making and national decision making policies (August 2026) in particular National decision-making policies N2: Improving the natural environment / HE9: Conservation areas
- Greater Norwich Local Plan (GNLP)
- South Norfolk Local Plan - Development Management Policies Document (October 2015)
- South Norfolk Council's Conservation Area Maps and Appraisal Documents
- South Norfolk landscape character assessments (Land Use Consultants 2001 / Chris Blandford's Reviews 2012
- South Norfolk Council Landscape susceptibility in relation to energy generation, storage and transmission SPD (December 2025 / Adopted February 2026)
- Natural England's National Character Area Profiles
- National Policy Statements (NPS) for Energy Infrastructure, specifically the Overarching NPS for Energy (EN-1), Renewable Energy Infrastructure (EN-3) and Electricity Network Infrastructure (EN-5) all dated December 2025, and which came into force in January 2026

In the concluding section of our LVI Case the relevant sections of policies, statements and guidance documents are considered in greater detail in order to inform our assessment of how the landscape and visual impacts of the scheme affect the planning balance.

2.3 Landscape Effects

The GLVIA3 (Guidelines for Landscape and Visual Impact Assessment) Glossary describes Landscape Effects as *"Effects on the landscape as a resource in its own right"*

GLVIA Para 5.1 states: *"An assessment of landscape effects deals with the effects of change and development on landscape as a resource. The concern here is with how the proposal will affect the elements that make up the landscape, the aesthetic and perceptual aspects of the landscape and its distinctive character."*

2.31 Landscape Effects during the Construction Phase

2.311 The Environmental Statement (ES) Chapter 7 (Table 7.5: Summary of Landscape Effects – Construction Phase) identifies 25 Landscape Receptors. These receptors cover

the whole scheme area and the surrounding countryside and for all of these receptors the type and direction of landscape effects during the construction phase is assessed as Direct and Indirect Adverse. The level of significance of effect for 6 of the receptors is assessed as Major / Significant. The level of significance of effect for a further 12 receptors is assessed as Moderate / Significant and for the remainder of the receptors (7) the level of significance of effect is assessed as either Minor / Not Significant (5) or Negligible / Not Significant (2).

2.312 The receptors assessed as experiencing either minor or negligible landscape effects during construction include 4 cable route corridors, Site 6 (which has been withdrawn as a site for solar infrastructure) and Landscape Character Area B4 (Waveney Tributary Farmland).

It is highly unlikely that landscape effects along any of the cable route corridors will be minor during the construction phase and the applicants ES is clearly misleading in this regard. Furthermore a study of the Landscape Character Areas map (Figure 5.1) in South Norfolk Council's South Norfolk Local Landscape Designations Review (produced by Chris Blandford Associates - 2012) shows that while much of the area designated as Landscape Character Area B4 (Waveney Tributary Farmland) is distant from the scheme area sections of B4 are closer (e.g in Pulham Market and Tivetshall and in Woodton, Topcroft, Bedingham and Hardwick) and here the landscape effects would certainly not be negligible.

We also dispute the assessment that the Boudicca Way Recreational Route (Long Distance Trail (LDT) will only experience a minor Significance of Effect. Field work conducted on our Shotesham Narrative Walk (supporting information to be supplied by deadline 2) reveals that the scheme will have a considerable impact on the landscape close to a section of this PROW.

Furthermore Site 6, while it is no longer proposed as a site for solar infrastructure, is located within the Landscape Character Area LCA B1 Tas Tributary Farmland and this LCA is assessed as having a level of Significance of Effect that is Major / Significant. Therefore Site 6, being located in this LCA should receive the same Major Significant assessment – to assess it differently from the Character Area in which it is located reveals an inconsistency of approach.

2.313 The 18 Landscape Receptors (72% of the total) assessed as experiencing either a moderate or major Significance of Effect during the construction phase (Direct and Indirect Adverse) include:

- 5 landscape character areas (all of which would have to accommodate sites for solar infrastructure if the scheme was permitted)
- 9 of the sites scheduled for solar infrastructure (which include a number of cable route corridors)
- Cable Route Corridor 4 (CRC4)
- The BESS site (including CRC 1 and CRC 2)

- National Landscape Character Area - NCA 83 South Norfolk and High Suffolk Claylands
- Via Beata Recreational Route (LDT)

All of these 18 Landscape Receptor locations are in, close to, or include within their boundaries parts of the scheme area.

2.314 For the reasons already given the assessments for Boudicca Way, Site 6 and in regard to four of the cable route corridors understate the level of landscape impacts and they should not have been assessed as having a level of significance of effect that is either negligible or minor.

Therefore we conclude that 24 of the Landscape Receptor areas should be assessed as likely to suffer moderate or major adverse landscape effects during the construction phase and a section of the remaining receptor (i.e. those parts of Landscape Character Area B4 / Waveney Tributary Farmland that are close to the scheme i.e. in Pulham Market and Tivetshall and Woodton, Bedingham, Topcroft and Hardwick) would also experience similar impacts.

2.315 Furthermore the assessment of the Level of Significance of Effect for a number of the Landscape Receptor areas as just Moderate is an underestimate of the potential landscape impacts during the construction phase - e.g. assessing the Level of Significance of Effect for LCA A1 Tas Rural River Valley as Moderate is clearly incorrect. This highly attractive landscape would not only be impacted significantly by the construction of Site 8 in Shotesham but also by the construction of that part of Site 7 which borders Fairstead Lane in Hempnall. A field scheduled for solar infrastructure directly to the south of Fairstead Lane is located within LCA A1 (Tas Rural River Valley) and a large "solar" field to the north of Fairstead Lane is adjacent to this character area and development in that field would adversely impact the landscape of LCA A1 too. Parts of Site 5 are also adjacent or close to LCA A1 – e.g. the large field immediately south west of Fritton Crossroads (where the B1527 meets The Street, Fritton). Clearly impacts on LCA A1 would be major not moderate.

2.316 It is therefore quite clear that during the Construction phase the Landscape effects will be major, adverse and highly significant over a large area of South Norfolk because these effects would be experienced over a dispersed scheme area, which stretches for over 15km from Tivetshall (to the south west) to Brooke and Seething (to the north east), and in the surrounding countryside.

2.32 Landscape Effects / Operation Phase (Year 1)

2.321 The Environmental Statement (ES) Chapter 7 Table 7.7: Summary of Landscape Effects – Operation Phase (Year 1) relates to the same 25 Landscape Receptors. As already noted these receptors cover the whole scheme area and the surrounding countryside.

2.322 During the Operation Phase (Year 1) the Table states that for 22 of these Receptors the type and direction of landscape effects is assessed as Direct and Indirect Adverse. For 2 of the Receptors the assessment is Indirect Adverse. The assessment for Site 6 is shown as N/A.

2.323 The level of significance of effect for 3 of the receptors is assessed as Major / Significant. The level of significance of effect for a further 10 receptors is assessed as Moderate / Significant and for 11 of the receptors the level of significance of effect is assessed as either Minor / Not Significant (6) or Negligible / Not Significant (5). Site 6 is listed as "no change"

2.324 We agree with the assessment of the level of significance of effect as Major Significant for Sites 1 and 8 and for the BESS Site and CRC1, CRC2.

Clearly the character of the landscape on Site 1 and the BESS site and the surrounding countryside would be altered enormously and negatively as a result of the presence of a BESS, a National Grid substation and a 400kv substation. Site 1 also includes a number of fields that would be covered by solar panels and associated infrastructure.

Site 8 is located in very attractive undulating countryside and straddles 2 landscape character areas (LCA A1 Tas Rural River Valley and B1 Tas Tributary Farmland). Clearly the assessment of a level of significance of effect as Major Significant is warranted.

2.325 Other parts of the scheme are located close to, or within the very attractive countryside of Landscape Character Area LCA A1 (Tas Rural River Valley). Sub-site 7B, to the south of Fairstead Lane in Hempnall, is within this LCA. Sub-site 7C, to the north of Fairstead Lane, is adjacent to this character area and parts of Site 5 are also adjacent or close to LCA A1. All sites within and adjacent to LCA A1 should be assessed as having a level of significance of effect of Major Significant as should the Landscape Receptor Area LCA A1 (Tas Rural River Valley). LCA A1 is assessed as having a level of significance of effect of Minor Significant in Table 7.7 – this is clearly incorrect.

2.326 5 of the cable route corridors (CRC4, CRC6, CRC7, CRC9, CRC13) are assessed as having a level of significance of effect of either Minor Not Significant or Negligible Not Significant. It seems highly unlikely that the landscape impacts resulting from the burying of cables over large areas of countryside, only one year after construction, will be minor or negligible. The landscape will not recover that quickly. Therefore assessments of Minor Not Significant or Negligible Not Significant are incorrect

2.327 The assessment of a level of significance of effect for sites 2, 3, 4, 5, 7, 9 and 10 as Moderate Significant is in all instances incorrect. During the Operational Phase these sites will be filled with solar infrastructure including panels up to 4.5m in height, security fences, inverter buildings, substations, security cameras, access roads and tracks. The landscape will be transformed – numerous arable fields and some meadows will be

converted in to an industrial landscape dominated by artificial structures. It is unbelievable that this can be described as anything other than a Major Significant change to the landscape. The magnitude of change is enormous and would affect a 15km stretch of countryside trending north eastwards all the way from Tivetshall to Seething. The inclusion of proposals for a visually dominant 400kv in Site 5 is by itself sufficient justification for the level of significance on that site to be assessed as Major Significant.

2.328 The introduction of so much artificial infrastructure in to the landscape would change the character of the whole area especially given the fact that it would be additional to existing solar developments in South Norfolk. Therefore the Landscape Character Areas that would house East Pye sites will not experience a level of Significance of Effect that is just moderate or in some cases minor as shown in Table 7.7.

2.329 We have already described the assessment of the level of significance of effect for LCA A1 (Tas Rural River Valley) as incorrect. The impacts on the landscape in LCA B1 (Tas Tributary Farmland), parts of LCA C2 (Thurlton Tributary Farmland with Parkland) and parts of LCA E2 (Great Moulton Plateau Farmland) would also be greater than the assessment of Moderate Significant.

2.3210 Numerous solar fields are proposed for LCA B1 (Tas Tributary Farmland) including sites in Hempnall, Shotesham, Saxlingham, Woodton, Brooke, Morningthorpe and Fritton and Stratton St Michael. The impact of these proposals on Tas Tributary Farmland would be Major Significant. Solar infrastructure would become a dominant feature in the landscape of this LCA throughout the operational phase if the scheme was permitted.

2.3211 Much of Site 10 in Woodton is located within LCA C2 (Thurlton Tributary Farmland with Parkland) and the level of significance of effect on the western section of this LCA would be greater than Moderate Significant throughout the operational phase – i.e. it would be Major Significant.

2.3212 Sites 1 and 2 would mainly occupy land in LCA E2 (Great Moulton Plateau Farmland), The presence of a National Grid substation, a BESS and a 400kv substation together with Site 1 and Site 2 solar fields and part of Site 3 in LCA E2 arguably elevates the assessment of level of significance of effect on this character area to Major Significant

2.3213 The level of significance of effect on LCA B4 Waveney Tributary Farmland is assessed as Negligible Not Significant but sections of LCA B4 are close to the scheme (i.e. in Pulham Market and Tivetshall and Woodton, Bedingham, Topcroft and Hardwick) and here the impacts would not be negligible – effects would be Moderate and Significant in these areas.

2.3214 The level of significance of effect on LCA B5 Chet Tributary Farmland is described as Minor Not Significant but parts of Site 10 are located in this LCA and here

and nearby the level of significance of effect would be greater than minor – i.e. it would be Major and Significant in the vicinity of Site 10.

2.3215 The level of significance of effect on National Character Area (NCA) 83 South Norfolk and High Suffolk Claylands is assessed as Minor Not Significant for the Operation Phase Year 1. While the scheme area is only a part of this NCA the landscape effects within and around the scheme boundary would be substantial. Furthermore there are solar developments elsewhere in the Claylands NCA and others in the planning pipeline so the cumulative impact of solar proposals on the landscape character of NCA 83 as a whole could end up as major.

2.3216 We dispute the assessment that the Boudicca Way Recreational Route (Long Distance Trail (LDT) will only experience a Minor Significance of Effect in the Operation Phase Year 1 our Shotesham Walk assessment (supporting information to be supplied by deadline 2) reveals that the scheme will have a considerable impact on the landscape close to a section of this PROW.

2.3217 Site 6, while it is no longer proposed as a site for solar infrastructure, is located within the Landscape Character Area LCA B1 Tas Tributary Farmland and our assessment for this LCA is that the level of Significance of Effect in the Operation Phase Year 1 would be Major / Significant. Therefore Site 6, being located in this LCA, should receive the same Major Significant assessment. It should not be described as "No Change" because the introduction of solar infrastructure nearby on parts of Site 7 (visible from Site 6) will introduce a change to the character of the landscape at site 6.

2.3218 In conclusion Table 7.7 (Summary of Landscape Effects – Operation Phase Year 1) consistently underestimates the landscape effects the scheme would produce in the operation phase Year 1. These impacts, as described above, would be much more severe than the applicant's assessments indicate and while the table clearly shows that the direction of effect is in all instances adverse (except for Site 6) the magnitude of negative change that the scheme would cause to the character of the landscape, not only in year 1 but throughout the operation phase, is not reflected in the content of Table 7.7.

2.33 Landscape Effects / Operation Phase (Year 15)

2.331 The Environmental Statement (ES) Chapter 7 Table 7.9: Summary of Landscape Effects – Operation Phase (Year 15) relates to the same 25 Landscape Receptors. As already noted these receptors cover the whole scheme area and the surrounding countryside.

2.332 The type and direction of effect remains assessed as adverse for 18 of the Landscape Receptors which clearly indicates that after 15 years of operation, including mitigation, the scheme would continue to produce detrimental landscape effects. For cable route corridors 4,6,7,9 and 13 the type and direction of effect is assessed as not

applicable. In the case of these cable routes the disturbance to the landscape caused by burying cables will have "healed" after 15 years so this is a fair assessment.

2.333 The level of significance of effect has been reduced for the following landscape receptors:

- BESS Site and CRC1, CRC2 – reduced from major significant to moderate significant
- Site 2 and CRC3 – reduced from moderate significant to minor not significant
- Site 3 - reduced from moderate significant to minor not significant
- Site 4 - reduced from moderate significant to minor not significant
- Site 5 - reduced from moderate significant to minor not significant
- Site 8 - reduced from major significant to moderate significant
- Site 9 - reduced from moderate significant to minor not significant
- Site 10 and CRC 14 - reduced from moderate significant to minor not significant

The justification for these reductions is offered in ES Paragraph 7.8.58 which states:

"In summary, following the establishment of landscape mitigation, the magnitude experienced will generally decrease. The proposed landscape mitigation would begin to perform its intended environmental function, helping to integrate the development into its setting and reducing the visibility of the Scheme. The mitigation would also deliver beneficial effects, including enhancement of landscape character through the reinforcement of woodland belts and hedgerows, which positively respond to improving habitat connectivity and supporting biodiversity gain."

2.334 We dispute these assessments. Paragraph 7.8.58 says that mitigation after 15 years will reduce the visibility of the scheme. This statement relates to visual effects it does not and cannot alter the fact that after 15 years the solar infrastructure remains in place and the change that the introduction of solar panels, security fences, inverter buildings, access tracks, substations etc has made to the character of the landscape (i.e. its landscape effect) remains as it was in year 1. In assessing Landscape Effects the change that a development produces in a landscape should be assessed whether it is seen or not seen – hiding it, even if successfully achieved, does not alter the effect.

2.335 Furthermore the mitigation offered, e.g. reinforcement of woodland belts and hedgerows, will itself alter the character of the landscape.

While the ES claims that reinforcement of woodland belts and hedgerows would enhance landscape character this is not necessarily the case. For example the area is crossed by a large number of green lanes – PROW that are bordered by narrow hedge or tree belts. Widening and reinforcing those belts to hide solar infrastructure would dramatically and negatively alter the character of these green lanes. Currently the vegetation along long sections of these green lanes is not dense enough to prevent the sun's rays from reaching the lanes and users of these routes can enjoy the dappling effects this creates and glimpses through the bordering vegetation to fields and meadows. The Widening and

reinforcing of hedgerows and woodland belts to block views of solar infrastructure from green lanes would destroy these delightful, familiar experiences.

Over much of the scheme area the elements which create the present landscape character i.e. open fields, meadows, copses, areas of woodland, hedgerows, individual trees etc are very much loved and appreciated by residents and visitors alike. Altering this balance of features in a way that is dictated by attempts to hide industrial infrastructure and not by a well thought out plan to improve landscape quality could and most certainly would produce negative landscape effects.

2.336 With regard to the landscape receptors that have had their level of significance of effect reduced in year 15 of operation compared with the year 1 assessment we offer the following comments as to why these reductions are incorrect.

The Bess would be located adjacent to a 400kv substation and alongside Site 1 solar fields and close to the national grid substation. It is therefore a significant part of the overall large scale development proposed for this area. The major adverse impacts resulting from this level of development are recognised as applying to Site 1. ES paragraph 7.8.59 says: *"Site 1 will continue to experience a Major magnitude. This will result in a Major level of significance".* The BESS is part of this development and it makes no sense for it to be assessed as having a lower level of significance of effect than Site 1. Table 7.9 assesses the Site 1 level of significance of effect as Major in year 15 of operation and for the reasons given the level of significance of effect attributed to the BESS should also be Major Significant.

We criticised the year 1 assessment of the level of significance of effect for sites 2, 3, 4, 5, 7, 9 and 10 as Moderate Significant and stressed how the magnitude of change resulting from the introduction in to many fields and meadows covering large areas on these sites of solar infrastructure including panels up to 4.5m in height, security fences, inverter buildings, substations (including a huge 400kv substation on site 5), security cameras, new access roads and tracks would transform and convert the countryside in to an industrial landscape dominated by artificial structures. A change of this enormous magnitude affecting a 15km stretch of countryside we argued must be assessed as level of significance of effect of Major Significant.

In year 15 all of this solar infrastructure would remain in place on these sites and therefore impacts on the character of the landscape would still be major. Even if there were a few marginal benefits resulting from the promised mitigation, although these (as already stated) are questionable, they would not and could not compensate for the enormous damage caused by transforming rural agricultural countryside in to a developed industrialised landscape.

Therefore we assess the level of significance of effect for sites 2, 3, 4, 5, 7, 9 and 10 in year 15 of operation as remaining Major Significant and this would remain the case throughout the 40 / 60 year operation phase of the scheme.

2.337 The ES assessments of the level of significance of effect for sites 2, 3, 4, 5, 9 and 10 of Moderate Significant at year 1 were clearly and reducing the levels to Minor Significant at year 15 is grossly incorrect. Furthermore while Site 7, together with cable route corridors 5, 8, 10, 11, 12, is assessed in the ES as a having a level of significance of effect at Year 15 of Moderate Significant and while this is not a reduction from the year 1 assessment it is, as already stated, an underestimate.

2.338 The reduction in the level of significance of effect at year 15 for Site 8 to Moderate Significant is unwarranted. The site is partly located in LCA A1 (Tas Rural River Valley) and partly in LCA B1 Tas Tributary Farmland and the undulating landscape in this part of Shotesham is especially attractive. Clearly the assessment of a level of significance of effect as Major Significant at year 15 is needed because the impact of the imposition of solar infrastructure in to this landscape setting would remain negative not only in year 1 but also year 15 and throughout the operation phase.

2.339 The 6 district landscape character areas listed as landscape receptors in Table 7.9 are assessed to have the level of significance of effect at year 15 as shown below (the assessments for year1 are shown in brackets):

- LCA A1 Tas Rural River Valley - Minor not Significant (Minor not Significant)
- LCA B1 Tas Tributary Farmland - Moderate Significant (Moderate Significant)
- LCA B4 Waveney Tributary Farmland – Negligible not Significant (Negligible not Significant)
- LCA B5 Chet Tributary Farmland - Minor not Significant (Minor not Significant)
- LCA C2 Thurlton Tributary Farmland with Parkland - Minor not Significant (Moderate Significant)
- LCA E2 Great Moulton Plateau Farmland - Moderate Significant (Moderate Significant)

We dispute these assessments and our assessments of the levels of significance of effect on these character areas at year 15 remains as for year 1. This is because the quantity and spatial extent of solar infrastructure in each of the character areas is the same in year 15 as year 1 and therefore its impact on landscape character, whether it is seen or not, will continue to be major and adverse.

In year 15 and throughout the operation phase scores of large fields and meadows will remain covered by solar infrastructure including solar panels up to 4.5m in height, security fences, inverter buildings, substations, security cameras, access roads and tracks creating an industrialised landscape dominated by artificial structures.

For reasons already stated we do not consider that mitigation designed primarily to hide solar infrastructure will lead to improvements in the character of the landscape. The planting of trees and hedges with the objective of screening ugly infrastructure could well lead to existing open views being lost, changes to the nature of green lanes and the constriction of PROW.

Most certainly the planting of trees and hedgerows in the right places can and should improve the quality of the landscape and is to be encouraged – one of the authors of this LVIA is a Tree Warden. However when the location of planting is dictated by the need to screen developments this can lead to the establishment of tree belts and hedges in locations that are inappropriate and most certainly not the best places for making a positive contribution to landscape character.

Our assessments of the levels of significance of landscape effects on the 6 district character areas at year 15, which as already stated are the same as for year 1 and for similar reasons, are set out below:

- LCA A1 Tas Rural River Valley – Major and Significant in the vicinity of Site 8 and Site 7 to the south of Fairstead Lane Hempnall
- LCA B1 Tas Tributary Farmland - Major Significant
- LCA B4 Waveney Tributary Farmland – Moderate and Significant in those parts of the LCA close to the scheme area
- LCA B5 Chet Tributary Farmland - Major and Significant in the vicinity of Site 10.
- LCA C2 Thurlton Tributary Farmland with Parkland – – major and significant in the vicinity of Site 10
- LCA E2 Great Moulton Plateau Farmland – Major Significant

2.3310 In the ES the level of significance of effect on National Character Area (NCA) 83 South Norfolk and High Suffolk Claylands at year 15 remains the same as for Year 1 – i.e. Minor Not Significant. In regard to Year 1 we stated that *"While the scheme area is only a part of this NCA the landscape effects within and around the scheme boundary would be substantial. Furthermore there are solar developments elsewhere in the Claylands NCA and others in the planning pipeline so the cumulative impact of solar proposals on the landscape character of NCA 83 as a whole could end up as major".* 15 years in to the operation phase many new solar developments could be built out in this National Character Area (NCA 83) and cumulative impacts would be major.

2.3311 We disputed the assessment for Year 1 that the Boudicca Way Recreational Route (Long Distance Trail (LDT) would only experience a Minor Significance of Effect because our Shotesham Walk assessment reveals that the scheme would have a considerable impact on the landscape close to a section of this PROW and our assessment for Year 15 (supporting information to be supplied by deadline 2) is that these considerable impacts will still be present.

2.3312 As already stated Site 6, while it is no longer proposed as a site for solar infrastructure, is located within the Landscape Character Area LCA B1 Tas Tributary Farmland and our assessment for this LCA is that the level of Significance of Effect in the Operation Phase Year 15 would be Major / Significant. Therefore Site 6, being located in this LCA, should receive the same Major Significant assessment.

2.3313 In conclusion Table 7.9 (Summary of Landscape Effects – Operation Phase Year 15) consistently underestimates the landscape effects the scheme would produce in the Operation Phase Year 15. These impacts, as described above, would be much more severe than the applicant's assessments indicate and for the reasons given we question the applicant's claim that mitigation planting would in any way reduce these impacts. It would in fact create some negative outcomes for the landscape. While the table clearly shows that the direction of effect is in all instances adverse (except for Site 6) the magnitude of negative change that the scheme would cause to the character of the landscape, not only in year 15 but throughout the operation phase (i.e. Major and Significant), is not reflected in the content of Table 7.9.

Footnote on the applicant's track record on fulfilling mitigation promises

The applicant does not have a good track record on delivering mitigation promises. The Environmental Statement for the Island Green solar site at Trowse near Norwich (SNC planning reference 2014/2380) promised that: *"the entire operational area of the solar farm will be seeded and managed as grassland, which would be managed as hay meadow"*. It also states that: *"the change in land use, from arable to species rich grassland, would provide an enhanced habitat for invertebrates and additional foraging opportunities for local wildlife such as birds and bats."* And it claims that: *"the proposed development affords opportunities to provide significant biodiversity benefits"* Part of the site was also meant to be managed as a wild flower meadow.

If these promises are measured against what is actually present on the Trowse site after 10 years of operation (plenty of time to establish hay fields and wild flower meadowland) as evidenced by the photographs we took on July 1st, 2026 (see appendix HPC APP-10) then serious doubt must be cast on the ability of the applicant to deliver on its mitigation promises.

Our photos reveal that the only plant the Trowse site seems to harbour in abundance is ragwort and they show that the surface area over much of the operational area is a scrubby mess. There is no evidence of a hay meadow or wild flower meadows and we doubt if the vegetation on site would appeal to local wildlife for foraging. The Biodiversity benefits are non existent.

The Trowse site is miniscule compared with the East Pye sites and if Island Green cannot deliver at Trowse they will most certainly not be able to fulfill mitigation commitments in the East Pye scheme area.

2.34 Landscape Effects - Decommissioning Phase

The operation phase of the East Pye scheme, if permitted, could last for up to 60 years. Hempnall Parish Council has not carried out an assessment of the landscape effects resulting from decommissioning because it would have been a highly theoretical exercise

based on a large number of assumptions that most likely would not be relevant in the last decades of the 21st century. The way renewable energy is produced will be very different as will the planning system and so many other parameters.

Furthermore our purpose in undertaking this LVIA was to assess and understand the likely impacts on our landscape, countryside and views should the East Pye proposals for a mega size solar energy scheme be consented and constructed. Therefore we have concentrated on assessing landscape and visual effects at Operation Phase Year 1 and Operation Phase Year 15 in order to understand these impacts and in this context it was not felt necessary to consider the decommissioning phase.

2.35 Landscape Effects – conclusion

We have examined the ES assessments of landscape effects during construction and in the operation phase, years 1 and 15, and found a consistent underestimation of the levels of significance of effects across the whole scheme area and surrounding countryside. The assessments apply to 25 landscape receptors and the ES does not provide an assessment for the scheme as a whole. Our analysis leads us to the conclusion that if a level of significance of landscape effect was applied to the whole scheme it would be Major and Significant and the direction of effect would definitely be adverse.

These assessments of landscape effects will be considered further in our evaluation of the planning balance with regard to landscape and visual issues.

Footnote

The photos we have included in Appendix HPC-APP-03 (Saxlingham Green Walk) and the additional photos we will supply by Deadline 2 as supporting information for our visual effects assessments in regard to our other Narrative Walks not only illustrate existing views they also show the character of the landscape as it is now. They are therefore useful in assessing how the current landscape character would be changed if solar infrastructure was constructed in the locations shown on the photographs.

We have used these photos as part of our assessment of Landscape Effects because it is quite clear that erecting copious amounts of solar infrastructure on the land shown in the photographs would produce major, significant and adverse impacts on the landscape at Operation Phase Year 1. Furthermore all of that solar infrastructure would remain in place at Year 15 and therefore it would continue **to** significantly impact landscape character, whether seen or not.

2.4 Visual Effects

The GLVIA3 glossary defines Visual Effects as *"Effects on specific views and on the general visual amenity experienced by people."*

GLVIA3 Para 6.1 states *"An assessment of visual effects deals with the effects of change and development on the views available to people and their visual amenity. The concern here is with assessing how the surroundings of individuals or groups of people may be specifically affected by changes in the content and character of views as a result of the change of or loss of existing elements of the landscape and/or introduction of new elements."*

The 124 ES view locations are distributed as follows:

- 9 in the Bess site
- 9 on Site 1
- 8 at Site 2
- 8 at Site 3
- 12 on Site 4
- 8 on Site5
- 4 on Site 6
- 21 on Site 7
- 11 on Site 8
- 7 on Site 9
- 10 on Site 10
- 17 on the Cable Route Corridors

2.41 Visual Effects – Construction Phase

2.411 ES Table 7.6 summarises the effects on visual amenity in the Construction Phase at the 124 View Locations – the ES levels of significance of effect are as follows:

- 5 View Locations – Major to Substantial Significant
- 35 View Locations – Major Significant
- 31 View Locations – Moderate Significant
- 31 View Locations – Minor not Significant
- 12 View Locations – Negligible not Significant
- 10 View Locations – No Change

The type and direction of effect for 113 View Locations is Direct Adverse and 11 are recorded as N/A – i.e. an assessment of the type and direction of effect is not applicable at those View Locations

The ES clearly recognises that Visual Effects at the construction phase at all View Locations, for which an assessment of the type and direction of effect is applicable, are direct and adverse.

2.412 A clear majority of View Locations (71) would experience moderate, major or major to substantial significant visual effects during the construction phase. We suspect that this is an underestimation of the disruption to views that would be caused by the construction of a scheme of this magnitude. However our own field based research, based

on viewpoint analysis over the whole of the scheme area, along PROW that cross or are alongside the solar sites, concentrates on assessing visual effects after construction (i.e. Operation Phase Year 1) and after mitigation planting has had a chance to become established (i.e. Operation Phase Year 15) therefore we make no further comments on Visual Effects during construction.

2.42 Visual Effects – Operation Phase Year 1

2.421 ES Table 7.8 summarises the Effects on Visual Amenity in Operation Phase (Year 1) at the 124 View Locations,

The ES levels of significance of effect are as follows:

- 1 View Location – Major to Substantial Significant
- 21 View Locations – Major Significant
- 31 View Locations – Moderate Significant
- 31 View Locations – Minor not Significant
- 20 View Locations – Negligible not Significant
- 20 View Locations – No Change

2.422 These assessments differ substantially from our evaluations of visual effects at Operation Phase Year 1. Our assessments show that the level of significance of visual effect at the viewpoints we have used is predominately Major Significant or Major to Substantial Significant.

For example of the 14 viewpoints we selected for evaluation on sub-site 7F (see appendix HPC-APP-03 Narrative Walk 7ii) 9 are assessed as having a level of significance of visual effect of **Major to Substantial Significant** at Year 1 and two are assessed as having a level of significance of visual effect of **Substantial Significant**. The ES only attributes an assessment of major significance to 4 of its 21 Site 7 view locations and these cover all of Site 7, an area much larger than sub-site 7F – it does not consider that any of its Site 7 view locations would experience major to substantial or substantial effects at Year 1.

The photographs displayed in appendix HPC-APP-03 (Narrative Walk 7ii) illustrate the attractive rural views currently enjoyed at each of our 7F viewpoints. At Year 1 these lovely pastoral views would be replaced by an industrial landscape where solar infrastructure (solar panels, security fences and cameras, inverter buildings, access tracks and a 132kv substation) would be the dominant element in views. How can this be anything other than a Major to Substantial or Substantial Significant and Adverse transformation?

2.423 Given the statement in paragraph 7.8.43 of the ES, which reads, *"The visual effect in Year 1 would result from the presence of the Scheme rather than from construction activities. The visual effect would be relatively large, especially in close-range views,*

because the landscape mitigation measures would not yet be fully established." it is surprising that the ES manages to identify over the whole scheme area only 21 View Locations at which visual effects would be Major Significant and just one where the impact would be Major to Substantial. On the other hand the ES identifies 51 View Locations where the level of significance of visual effect would be either Minor not Significant or Negligible not Significant.

2.424 The ES is more accurate in its assessment of the Type and Direction of Effect at Operation Phase Year 1 The type and direction of effect for 104 View Locations is Direct Adverse and 20 are recorded as N/A – i.e. an assessment of the type and direction of effect is not applicable at those View Locations

The ES clearly recognises that Visual Effects at the Operation Phase Year 1 at all View Locations, for which an assessment of the type and direction of effect is applicable, are Direct and Adverse.

2.425 Our evaluations are based on field work research carried out over the whole of the scheme area. Most of our viewpoints are along the PROW that cross or are alongside the solar sites **(see footnote * below)**, but they also include some view locations on minor roads which run through or are adjacent to solar sites. Our assessments were carried out by 2 of the authors of this LVIA who possess very detailed local knowledge and a great understanding of the PROW network in the scheme area.

We have examined and assessed each viewpoint individually and our analysis includes a description of the current view(s) at each location together with assessments of the view(s) that would be experienced at Operation Phase Year 1 and Operation Phase Year 15. Our reasoning is explained for each viewpoint or group of viewpoints and we will be supplying supporting information including maps and photographs at deadline 2.

Collating and presenting the evidence underpinning and explaining our assessments for all of our viewpoints over the whole scheme area is a major piece of work reliant mainly on the efforts of 2 volunteers. It involves the preparation of maps and the organisation of photos and analysis in to a format that is both accessible and understandable which will require a considerable amount of time. This was explained to the Inspectors at the Preliminary Meeting on September 15th 2026, under agenda Item 4 Draft Examination Timetable, and the Inspectors showed great understanding and said they would allow HPC to present its evidence based tables, photos and maps, which support its Written Representation conclusions, by Deadline 2 (October 27, 2026).

2.426 Our overall conclusion on the level of significance of visual effects at Year 1, based on the research we have undertaken over the whole scheme area, is that the assessments we made for sub-site 7F, which revealed that most viewpoints would

experience Major to Substantial , Significant and Adverse impacts, are replicated on every site included in this application and that the ES has consistently and significantly underestimated these impacts over the whole scheme area.

2.427 We request that the information in support of our conclusions, when collated and presented (by Deadline 2) is studied closely – especially the photographs which, as already stated in the context of sub-site7, illustrate that the very attractive rural views currently enjoyed along almost every footpath on every site at each viewpoint, will at Year 1 be replaced by an industrial landscape where solar infrastructure (solar panels, security fences and cameras, inverter buildings, access tracks, substations, a BESS and a National Grid Sub Station) is the dominant element in views. We once again pose this question: How can this be anything other than a Major to Substantial, Significant and Adverse transformation?

*** Footnote regarding the location of the viewpoints selected by Hempnall Parish Council and the View Locations selected for inclusion in the applicant's ES**

The View Locations chosen for inclusion in the ES are predominately locations on PROW. 92 of these 124 locations are on PROW, including some at PROW junctions with minor roads and some at PROW origin points. 27 are located on minor roads. The remaining 5 locations are either on the edge or close to settlements or they are located along major roads.

We have also based our Visual Effects assessment on View Locations (Viewpoints) located mainly on PROW but we also include some viewpoints on minor roads. While the View Locations we have chosen differ in most instances from those in the ES the fact that the ES has chosen to primarily assess views experienced along PROW and we have done the same means that when comparing conclusions on visual impacts on users of PROW both sets of assessments (the ES and our own) are evaluating visual impacts on the same receptors. This increases the validity of comparisons between our findings and those recorded in the ES.

Our choice of View Locations (Viewpoints) was based on the very detailed local knowledge of 2 of the Hempnall Parish Council LVIA authors who possess a great understanding of the PROW network in the scheme area and who used this awareness to select viewpoints on PROW where the views are highly appreciated by both local residents and visitors alike.

Furthermore all of our View Location assessments are based on field work and evaluations made by the authors on site. Many view locations were visited more than once. Our assessments include maps and relevant photos.

How many of the ES 124 view locations received such careful scrutiny via on site field work research?

Some of our view locations are also assessed in the ES. Where there is a coincidence of view locations we have responded to Mr Cliff's request (made at the Dunston Hall hearings September 15th – 17th) to provide details of how the assessments differ. Where our viewpoints on sub-site 7F coincide with ES viewpoints we have provided these details in Appendix HPC-APP-03 Narrative Walk 7ii (Saxlingham Green) and will provide further analysis of "shared" viewpoints elsewhere in the scheme area in the supporting information we are supplying by deadline 2.

2.43 Visual Effects – Operation Phase Year 15.

2.431 ES Table 7.10 summarises the Effects on Visual Amenity in Operation Phase (Year 15) at the 124 View Locations.

The ES levels of significance of effect are as follows:

- 0 View Locations – Major to Substantial Significant
- 0 View Locations – Major Significant
- 17 View Locations – Moderate Significant
- 45 View Locations – Minor not Significant
- 32 View Locations – Negligible not Significant
- 30 View Locations – No Change

These ES assessments show a marked reduction in the level of significance of visual effects at Operation Phase Year 15 when compared with Operation Phase Year 1.

According to the applicants ES there are no view locations at which assessments of Major or Major Substantial Significance continue to apply and the number of view locations experiencing levels of significance of visual effects that are Moderate Significant has dropped from 31 to 17. On the other hand view locations experiencing either Minor not Significant or Negligible not Significant levels of significance of visual effects has increased from 51 to 77.

The justification for these reductions is summarised in part of ES paragraph 7.8.66 which reads: *"Overall, the visual effects assessed for Year 1 are predicted to diminish by Year 15 as the landscape mitigation establishes and provides filtering and screening benefits."*

Not only do we consider that the ES assessments of the Levels of Significance of Visual Effects over the whole scheme area are grossly understated for Operation Phase Year 1 we also contest the assertion that mitigation will diminish impacts significantly by Operation Phase Year 15.

2.432 Mitigation provided by the reinforcement of woodland belts and hedgerows, will itself alter views of the landscape and the negative visual effects resulting from this

planting are analysed in great detail in our Narrative Walk descriptions which are based entirely on field work conducted along footpaths across the whole scheme area (the supporting information in regard to our narrative walks including maps and photographs will be provided by deadline 2)

2.433 The concluding part of ES paragraph 7.8.66 acknowledges that mitigation planting can negatively affect views and would not screen all views of solar infrastructure when it says: *"In certain locations the vegetation will influence the open visual character of the view and / or some views are expected to remain affected with visibility of the Scheme remaining".* However the ES does not give significant weight to these impacts in its assessments of the Level of Significance of Visual Effects at Operation Phase Year 15 and therefore underestimates visual effects at Year 15.

For example the ES assessments for the whole of Site 7 of the Levels of Significance of Visual Effects at Year 15 do not identify any View Locations at which an evaluation of Major Significant applies. In contrast our assessments of sub-site 7F, which is only one part of Site 7, show that 9 of our 14 sub-site viewpoints would experience Major to Substantial levels of significance of visual effects and 2 would experience a Substantial Significant impact at Year 15 (see appendix HPC-APP-03 Narrative Walk 7ii).

The photos of existing views on sub-site 7F (see appendix HPC-APP-03 Narrative Walk 7ii) clearly reveal very attractive open views over meadows and fields towards copses, areas of woodland, hedgerows and individual trees. These views are very much loved and appreciated by residents and visitors alike. These views would not only be sacrificed to industrial infrastructure at Year 1 but they would also be completely blocked out by mitigation planting by Year 15 and this is why we continue to assess visual effects as predominantly major to substantial.

2.434 Our research shows that the assessments we made of the visual effects at Year 15 on sub-site 7F are replicated across the whole of the scheme area with the majority of our evaluations of the level of significance of visual effects at Year 15 being Major to Substantial. The reason for this scheme wide similarity of findings is that the existing landscape on all of the sites typically has numerous views over open fields and meadows towards copses, areas of woodland, hedgerows and individual trees and mitigation planting would eradicate these views especially in summer. In leafless winter there would be glimpses through the vegetation shield but then these glimpses would just bring the solar infrastructure in to view.

2.435 Not only would mitigation planting block views it would also change the character of the PROW that cross or run alongside the solar sites, around 30km of paths and tracks in total. Reinforcement of woodland belts and hedgerows to hide solar infrastructure would create paths with long sections lacking open views and these routes would become monotonous corridors, narrow in many places, bordered by tall vegetation whose main purpose is to hide the presence of industrial infrastructure. The numerous walkers, joggers, horse riders and cyclists that use these routes would experience a much more uniform, homogenous recreational experience than the one they currently enjoy.

2.436 Furthermore there are many green lanes in the scheme area. These PROW and un-surfaced tracks, including some un-surfaced county roads, are edged with hedging, trees and occasionally small copses. They provide a delightful environment for the walker with the low density of vegetation bordering the routes enabling frequent glimpses of the surrounding countryside and allowing the sun's rays to reach the paths surface often with a dappled effect resulting from the passage of the rays through twigs and leaves. Thickening the hedgerows and planting more extensive woodland belts along these green lanes to hide solar infrastructure would radically and negatively alter the character of these delightful and much loved routes.

2.437 Mitigation planting, the location of which would be dictated by attempts to hide industrial infrastructure, does not constitute a well thought out plan to improve landscape quality. It can so easily lead to the planting of the wrong kind of vegetation in the wrong places the sole purpose of which is to screen ugly development.

2.438 At least the ES acknowledges that the Type and Direction of Effect at Operation Phase Year 15 for a clear majority of its View Locations is Direct and Adverse (94 out of 124). For 30 View Locations an assessment of the type and direction of effect is not applicable.

2.439 While we have completed our research and established our conclusions in regard to visual effects across the whole scheme area at Year 15 we still have to, as already explained, collate and present the evidence underpinning and explaining our assessments in to a format that is both accessible and understandable and this task will require a considerable amount of time to complete. The Inspectors have therefore allowed us to present our evidence based tables, photos and maps, which support the conclusions in this Written Representation, at a later date – i.e Deadline 2 (October 27, 2026).

Our overall conclusion of the level of significance of visual effects at Year 15 is that our findings in regard to site 7F, which revealed that most viewpoints would experience Major to Substantial Significant and Adverse impacts, are replicated on every site in the scheme area and that the ES has once again consistently and significantly underestimated these impacts.

Again we ask that the evidence in support of our conclusions, when collated and presented (by Deadline 2) is studied closely – especially the photographs which show the very attractive rural views currently enjoyed along almost every footpath on every site at each viewpoint that will be lost as a result of mitigation planting by Year 15.

2.44 Visual Effects – Decommissioning Phase

The operation phase of the East Pye scheme, if permitted, could last for up to 60 years. Hempnall Parish Council has not carried out an assessment of the visual effects resulting

from decommissioning because it would have been a highly theoretical exercise based on a large number of assumptions that most likely would not be relevant in the last decades of the 21st century. The way renewable energy is produced will be very different as will the planning system and so many other parameters.

Furthermore our purpose in undertaking this LVIA was to assess and understand the likely impacts on our landscape, countryside and views should the East Pye proposals for a mega size solar energy scheme be consented and constructed. Therefore we have concentrated on assessing landscape and visual effects at Operation Phase Year 1 and Operation Phase Year 15 in order to understand these impacts and in this context it was not felt necessary to consider the decommissioning phase.

However we offer the following comment in regard to visual impacts after decommissioning which is, if and when all solar infrastructure is removed the landscape character and views will not revert to the pre-scheme situation. This is because mitigation planting, the location of which would have been dictated by the need to hide infrastructure and not as part of a well designed plan to improve the landscape, will remain and will continue to block the lovely pre-scheme views shown on the photos we have submitted in our assessments.

2.45 Visual Effects – conclusion

We have examined the ES assessments of visual effects at Operation Phase Year 1 and Operation Phase Years 15, and found a consistent underestimation of the levels of significance of effects across the whole scheme area and surrounding countryside. The ES assessments apply to 124 View Locations. Our assessments based on field study research involving numerous viewpoints along PROW, and some minor roads, that cross, or are alongside the proposed solar sites, leads us to the conclusion that impacts on views throughout the whole scheme area will Major to Substantial, Significant, Direct and Adverse.

Our assessments of visual effects will be considered further in the evaluation of the planning balance with regard to landscape and visual issues.

Footnote

There is a major discrepancy between our assessments of visual effects and the ES assessments. It is crucial that the Examining Authority carefully studies the supporting information we are supplying by Deadline 2 (tables, maps and photos of our narrative walks) in order to understand why Hempnall Parish Council has arrived at its conclusions.

Because there are big differences between the Visual Effects assessments in the ES and those presented by Hempnall Parish Council, at both Operation Phase Year 1 and Operation Phase Year 15, we would welcome site visits by members of the inspection

team to at least some of our viewpoints in order to facilitate further understanding of the reasons we have given in support of our assessment conclusions.

2.5 Visual Effects – Residential Amenity

Hempnall Parish Council does not have the resources to undertake a Residential Visual Amenity Assessment across the whole scheme area but this does not mean that we accept or agree with the assessments in the East Pye Solar Environmental Statement Volume 3: Appendix 7.8 – Residential Visual Amenity Assessment Revision 1 March 2026

Only 20 properties were selected for individual assessment in Table 1 (Properties Identified within RVAA Study Area - Steps 2 & 3) and we certainly take issue with the statement in paragraph 2.1.13 of ES Appendix 7.8: Residential Visual Amenity Assessment which reads: *"Given the low likelihood of significant visual effects and the absence of other qualifying receptors within the 100m range, no further detailed assessment has been carried out on residential properties located beyond this 100m offset from the maximum development parameters".*

ES Figures 7.9 (Residential Receptors Plan Sheets 1, 2, 3, 4, 5, 6, 7 and 8) show hundreds of properties located within 500 metres of the scheme boundary. Furthermore all of these are within the zones of theoretical visibility. Many of these properties will be significantly impacted by the visual effects of the scheme – especially those within 250 metres and where the topography, the slope of the land, exposes views of the solar infrastructure to the residents of the properties.

It is the view of Hempnall Parish Council that ES Residential Visual Amenity Assessment Revision 1 March 2026 fails to cover visual impacts on residential amenity comprehensively and adequately.

2.6 Cumulative Effects

Cumulative effects can be defined as the additional effects arising from changes caused by a proposed development in conjunction with other past, present, or reasonably foreseeable developments.

GLVIA paragraph 7.1 states that: *"Cumulative effects have been defined in a broad generic sense as impacts that result from incremental changes caused by other past, present or reasonably foreseeable actions together with the project"*

Cumulative Effects can also occur within a project and these intra-project cumulative effects require links between landscape and visual effects and effects identified in other topic areas to be considered.

We have made assessments of both the between project (inter-project) and within project (intra-project) cumulative effects in regard to the East Pye proposals

2.61 Inter Project Cumulative Effects

2.611 A study of East Pye Solar Environmental Statement Volume 1: Chapter 7 – Landscape & Visual Revision 1 March 2026 reveals a very short "short list" of relevant developments considered in its assessment of cumulative effects and it lists those developments which have the potential to result in cumulative effects on Landscape and Visual receptors within the associated Study Area in Table 7.13.

ES Paragraph 7.11.6 discounts *"A total of 30 short-listed developments which lie beyond the Study Area"* which *"are not considered further in this chapter".*

Only 10 Committed Developments / Allocations relevant to Landscape & Visual appear in Table 7.13 and these include 2 solar developments, 2 Bess proposals, 4 residential developments and 2 "hybrid" schemes that include land for residential and employment development and other uses.

The ES then goes on to assess cumulative impacts and concludes in paragraph 7.11.37 that *"The cumulative landscape and visual effects assessment identifies that no significant cumulative effects to receptors occur as a result of the Scheme and committed developments".*

2.612 Not only is the consideration of cumulative landscape and visual effects in ES Volume 1: Chapter 7 limited in its geographic coverage and confined to a very short "short list" of developments it is also very confusing in many respects.

For example, ES Paragraph 7.11.1 reads *"This section presents an assessment of cumulative effects between the Scheme and other existing and/or approved developments."* This appears to restrict consideration to only those schemes that have been built out or permitted and therefore does not appear to allow for the inclusion of schemes at an earlier stage in the planning process. However included in the short "short list" are developments that have not yet been approved – e.g. SNC reference 2018/0111 - 31.7 hectares of land to the east of the A140 seeking outline planning permission for 1275 dwellings, employment land and other uses. This is confusing.

Furthermore ES Figure 2.1: Cumulative Developments Revision A is a map with a 25km buffer that shows numerous developments with planning reference numbers that are located over a wide area stretching from North Suffolk to north of Norwich but developments outside the study area are not considered in the consideration of cumulative landscape and visual effects in ES Volume 1: Chapter 7. This also is confusing.

2.613 ES paragraph 7.11.4 states that*: "A short list of cumulative developments/allocations can be found in ES: Appendix 2.4 Cumulative Schemes [EN0110014/APP/6.3.2.4]."*

A study of *ES:* Appendix 2.4 Cumulative Schemes [EN0110014/APP/6.3.2.4] Table 1.4 which is titled a *"Long and Short List of Cumulative Schemes"* doesn't provide much clarification. How did the contents of this table end up as the short "short list" in Table 7.13? We could only see a long list displayed in Table 1.4 where is the short list? This is very confusing.

Surely planning law and PINS guidance requires tables to be clear and unambiguous.

Whatever the reasoning and methodology, as already stated, only 10 Committed Developments / Allocations relevant to Landscape & Visual appear in Table 7.13 of the Environmental Statement Volume 1: Chapter 7 – Landscape & Visual (Revision 1 March 2026). Therefore our analysis of the deficiencies in the ES treatment of inter project cumulative landscape and visual effects concentrates on that short list of 10, which is actually only 9 because the Tasburgh Solar Farm (SNC reference 2014/0562) is dismissed in Table 7.13 with the following wording: "*This is not considered further within the cumulative assessment in this chapter".*

We also offer a cumulative impact map which covers a larger area and includes a more comprehensive list of developments that should be considered in an assessment of cumulative landscape and visual effects.

2.614 Hempnall Parish Council's analysis of the ES Chapter 7 treatment of cumulative landscape and visual impacts and explanation of why the study area should have been much larger and the list of developments considered much longer

2.615 Hempnall Parish Council considers the ES assessment of inter project cumulative effects to be inadequate both in terms of its geographic coverage and conclusions. A proposal that stretches for 15km from Tivetshall to Seething and which would result in almost 3,000 acres of South Norfolk countryside being covered by solar infrastructure has far deeper and wider cumulative effects than those that have been assessed using the ES methodology. An NSIP scheme of this magnitude must be evaluated in the context of its impacts over the wider area.

2.616 Hempnall Parish Council considers that the study area for assessing cumulative effects should include all landscape character areas shown on Figure 5.1 in Chris Blandford's review of the South Norfolk Local Landscape Designations because as GVLIA3 clearly states: *"The most significant cumulative landscape effects are likely to be those that would give rise to changes in the landscape character of the study area so as to result in significant effects on its key characteristics and even, in some cases to transform it into a different landscape type"* and we consider that the cumulative impact of all the solar schemes proposed for and currently operating throughout the whole of South Norfolk could in combination and with the addition of the East Pye scheme result in highly significant effects on key characteristics and lead to a transformation in the landscape character of large parts of South Norfolk. In order to appreciate the magnitude

of these cumulative impacts it is necessary to expand the study area to include all of the South Norfolk landscape character areas. The Cumulative Impact map we have produced therefore covers a much larger area of South Norfolk (400 sq km / 154 sq miles / 99,000 acres) – see Appendix HPC-APP05 – Cumulative Map

2.617 The summary section of GLVIA3 Chapter 7 provides guidance as to which schemes should be included when assessing cumulative landscape and visual effect and it says: *"In terms of the timescale of proposals for inclusion, existing schemes and those under construction should be included in the baseline for both landscape and visual effects assessment."* **And:** *"in addition potential schemes that are not yet present in the landscape but are at various stages in the development and consenting process, including schemes with planning consent and schemes that are the subject of a valid planning application that has not yet been determined".*

2.618 Following this guidance we have included 20 solar and related projects on our Cumulative Impact map including the East Pye scheme (see Appendix HPC-APP05 – Cumulative Map) Some of these projects have been constructed and are operating, some are under construction or have been permitted and are awaiting construction and others have entered the local authority (South Norfolk Council) planning process and have planning application reference numbers.

2.619 We also include the Tasway Energy Park on the map as it is an NSIP proposal which completed its non-statutory Phase 1 public consultation in December 2025. While the Tasway proposal is currently paused it has not been placed on indefinite hold as incorrectly reported in the ES (East Pye Solar Environmental Statement Volume 3: Appendix 2.4 – Cumulative Schemes Revision 1 March 2026). The latest information available from the Tasway Energy Park website says: *"Tasway Energy Park has been awarded a Gate 1 offer. This means when capacity becomes available in the region we would be eligible to accept a full grid connection offer."* **And:** *"The project team will now be reviewing next steps for the Tasway programme and how this outcome will affect this. This outcome will mean there will be a delay to the planning submission process until the project has better visibility of a grid connection point".*

2.6110 Following GLVIA3 advice we have not included schemes that are at the pre-planning or scoping stage on our map.

Those schemes included on the map are as follows:

1) Station Road Solar Farm Tivetshall (SNC planning reference - 2024/3817 / status planning permission granted)
2) Great Moulton BESS (SNC planning reference - 2025/1689 / status - Pending Consideration
3) Wacton Road BESS, Forncett St Peter (SNC planning reference - 2025/1152 / status - approved with conditions)
4) Tasburgh Solar Farm (SNC planning reference - 2014/0562 / status – operational)

5) Wymondham Road BESS, Braconash (SNC planning reference - 2025/0773 - ES not required)
6) Bracon Ash Solar Farm (SNC planning reference - 2023/1055 / status – operational)
7) Bloys Grove Solar Farm (SNC planning reference - 2021/2495 / final stages of construction)
8) Hethel Solar Farm (SNC planning reference - 2021/0569 / status - approved with Conditions)
9) Norwich Main BESS (SNC planning reference - 2023/0617 / status – nearing completion)
10) Hornsea 3 BESS (SNC planning reference - 2021/2645 / status - approved with conditions)
11) Intwood Farm BESS (SNC planning reference - 2023/0009 / status - EIA not required)
12) Keswick BESS (SNC planning reference - 2025/2275 / status - pending consideration)
13) Swainsthorpe BESS (SNC planning reference - 2023/1095 / status - EIA not required)
14) Hall Farm BESS - (SNC planning reference - 2024/3750 / status - approved with conditions)
15) Trowse Solar Farm (SNC planning reference - 2014/2380 / status - operational
16) Avenue Solar Farm, Yelverton (SNC planning reference - 2014/0411 / status- operational)
17) Back Road Solar Park, Yelverton (SNC planning reference - 2025/1442 / status - pending decision)
18) Stoke Lane solar farm, Swainsthorpe (SNC planning reference - 2026/1819 / status – EIA required)
19) Tasway Energy Park – NSIP proposal - non-statutory Phase 1 public consultation
20) East Pye NSIP proposal – Examination Phase

2.6111 Only 4 of the schemes shown in our list appear in the ES short list of developments which have the potential to result in cumulative effects on Landscape and Visual receptors in ES Table 7.13 and they are the Great Moulton BESS proposal (2025/1689), the Tasburgh solar farm (2014/0562), the Station Road Solar Farm Tivetshall (2024/3817) and the Wacton Road BESS which the ES says relates to a *"screening opinion sought on BESS development".* The ES uses an old planning reference number in regard to the Wacton BESS - 2024/1495 and therefore fails to acknowledge that the application for the Wacton Road BESS has now been approved with conditions attached (2025/1152).

The failure of the ES to consider more South Norfolk solar and BESS schemes in its cumulative effects appraisal is lamentable and negligent.

2.6112 A close examination of ES Figure 7.5.1 (Zone of Theoretical Visibility with View Locations Overview Sheet - DTM and DSM) clearly shows that the ES study area is too small to assess the visual impacts because its limits are within the 3km search area and the ZTV clearly reveals visual impacts beyond the study area boundary within both the

3km and 5km search areas. Furthermore note 7, alongside the plan, states that: *"Viewsheds have been clipped to a 3km search area for DSM and 5km search area for DTM"* – in other words there are visual impacts beyond the 5km search area that are not shown.

Included within the boundary of the ES 5km search area are a number of the sites that we have included on our cumulative impact map including:

- The Bloys Grove solar scheme, Swainsthorpe
- The Braconash solar farm
- The Stoke Lane solar farm proposal
- The Wymondham Road BESS
- Large sections of land included in the Tasway Energy Park proposals
- The Tasburgh solar farm
- The Wacton Road BESS, Forncett St Peter
- The Great Moulton BESS
- The Station Road Solar Farm Tivetshall
- Avenue Solar Farm, Yelverton
- Back Road Solar Park, Yelverton

Some of these sites fall within the study area and others are just outside but in all instances Figure 7.5.1 (Zone of Theoretical Visibility with View Locations Overview Sheet - DTM and DSM) clearly shows that parts of these sites, and in some cases all of the area of the site, will experience visual impacts if East Pye is permitted. The East Pye solar infrastructure would be visible from these locations. Because the ES cumulative effects study area is defined too narrowly its short list of 10 developments fails to include 7 of the 11 developments listed above.

2.6113 Furthermore, as already mentioned, the ES short list only includes 2 solar farms and a consideration of the significance of one of these, the Tasburgh solar farm - a solar development approved in 2014 (2014/0562) and now operational, is ignored. ES Table 7.13 says that it: *"is not considered further within the cumulative assessment in this Chapter."* This makes no sense at all because, if permitted part of East Pye site 4 would be constructed adjacent to the eastern and southern boundaries of the Tasburgh solar farm and joining these 2 schemes together would create a longer continuous stretch of countryside covered by solar infrastructure. This would not only create significant cumulative visual effects but would also result in a significant cumulative impact on landscape character. Why then is the Tasburgh solar farm not considered further in ES Volume 1 Chapter 7?

2.6114 GLVIA3 paragraph 7.17 states that there are seven main types of cumulative impact. These include*: "The 'filling' of an area with either the same or different types of development over time"* and *"Temporal effects, referring to the impacts on communities and localities over an extended period of time".*

The ES study area is far too small to assess how a large area within South Norfolk will be "filled" with solar developments over time. Our map (Map B) covers a much wider area

and clearly shows how solar developments (including East Pye) would infill a 400 sq km area of land if some or all of the solar schemes in the planning system were built out – some of course have already been constructed. The cumulative impacts on communities and localities if this level of solar development over the wider area was permitted would be enormous. A large number of residents and visitors have already expressed their "horror" after seeing the visual impacts created by the 200 acre Bloys Grove solar farm – one can only imagine how immense the reaction would be if East Pye was permitted as it would result in an area almost 15 greater than the Bloys Grove site being covered in solar infrastructure.

2.62 Inter Project Cumulative Landscape Effects

While intervisibility is a key consideration in the assessment of cumulative visual effects the assessment of cumulative landscape effects should concentrate on changes to landscape character (whether seen or not) resulting from the presence of a number of solar schemes and other developments in an area.

GLVIA3 paragraph 7.25 provides a systematic breakdown of how a proposed development, in combination with other schemes, can impact the landscape. It states that these cumulative landscape effects should be assessed through a consideration of impacts:

• On the fabric of the landscape as a result of or changes in individual elements or features of the landscape and / or the introduction of new elements or features
• On the aesthetic aspects of the landscape (e.g. scale, sense of enclosure, diversity, pattern and colour), and perceptual or experiential attributes, such as sense of naturalness, remoteness or tranquillity
• On the overall character of the landscape as a result of changes in the landscape fabric and/or in aesthetic or perceptual aspects, leading to modifications of key characteristics and possible creation of new landscape character if the changes are substantial enough.

GLVIA3 Paragraph 7.25 clearly requires a cumulative landscape assessment to look beyond simple intervisibility and viewpoints. The broader environmental impacts detailed in the 3 bullet points above can only be properly assessed and evaluated over a study area that is large enough to include all developments that would impact landscape character over the wider area and as already stated the ES study area is far too small to assess how a large area within South Norfolk will be "filled" with solar developments over time.

By highlighting the importance of assessing cumulative landscape effects on the fabric of the landscape; on the aesthetic aspects of the landscape and on the overall character of the landscape GLVIA3 is clearly advising that an LVIA needs to assesses the landscape as a whole as a broader geographic and environmental resource. The ES has restricted its study area so narrowly that it fails to do this

2.621 Our cumulative impact map clearly shows the huge impact that all the solar and related schemes currently in the planning system could have on a 400sq km area in South Norfolk.

Government ministers regularly claim that Ground-mounted solar farms currently occupy roughly 0.06% to 0.1% of all UK land and the Land Use Framework estimates that to meet net zero goals by 2050 approximately 0.5% of total agricultural land would need to be covered by ground mounted solar. If all the schemes shown on our map were developed (and some already are built out) the amount of agricultural land covered by solar infrastructure would exceed 0.5% by a huge margin. The cumulative landscape impacts would be enormous transformative and the contribution that East Pye would make to this negative change needs to be assessed in this context.

2.622 The current landscape over much of South Norfolk is attractive, rural, agricultural and relatively tranquil. The cumulative landscape impacts that the East Pye scheme would produce, in combination with the other schemes shown on our map, include:

Effects on the fabric of the landscape: The addition (by East Pye) of an additional 2,700 acres of solar infrastructure in to the landscape would industrialise large tracts of countryside and in combination with other solar schemes result in a major transformation of landscape character in all the landscape character areas covered by our map. The recently constructed Bloys Grove solar farm illustrates just how big an impact a solar development can have on landscape character and this scheme only covers 200 acres. East Pye would be almost 14 bigger and would be transformative in terms of its impacts on landscape character.

Effects on aesthetic and perceptual aspects: The huge scale of the East Pye scheme in combination with impacts resulting from the other developments shown on our map would transform and alter the visual and sensory qualities of the area. The presence of solar panels up to 4.5m in height, together with security fences, inverter buildings, new tracks, substations, a BESS and a National Grid sub station in the landscape, all of which would be additional to existing and proposed solar infrastructure, would create serious aesthetic and perceptual effects. Artificial structures would replace the more natural aesthetic appearance of farmland over large areas. The sense of tranquility would be lost in many places (we assess this in greater detail in our assessment of impacts on rural tranquillity)

2.623 People's perceptions (residents and visitors) of the landscape will change dramatically. The economic contribution that tourism makes to the Norfolk economy per annum is assessed at between £2.8 billion and £3.4 billion. Many small businesses in South Norfolk rely wholly or partly on income generated by tourism. The applicant's comment that impacts on tourism resulting from the construction of the East Pye scheme will be negligible is inaccurate.

For example the potential cumulative impacts of East Pye and other developments on people's perceptions of the area can be illustrated by describing what a traveller could encounter in the future on a journey south along the A140 from Norwich to the Suffolk border. They would get more than a glimpse of the massive Hornsea 3 onshore converter station south of the A47 close to its junction with the A140. A bit further south the

Norwich main BESS would come in to view on the western side of the road and the Hornsea 3 BESS would appear to the East. There could also be glimpses of an enlarged Swardeston sub station. Moving a bit further south Bloys Grove solar farm would be seen to the west and Stoke Lane solar farm to the east. Very soon afterwards the solar fields in the western section of East Pye site 7 would appear to the east of the A140 followed by views of site 4 on both sides of the road and a glimpse of the Tasburgh solar farm to the west. South of Long Stratton East Pye site 2 would come in to view to the east of the A140 and it would probably be possible to see the East Pye BESS and National Grid substation also, South of the junction between the A140 and the B1134 there would be views (near Dickleburgh) of another planned solar farm. All along the route the traveler would be accompanied by lines of pylons to the west including those erected along the new Norwich to Tilbury pylon route.

We could describe similar impacts on people's perceptions of the area along numerous other routes through South Norfolk – e.g. along the B1527.

If East Pye is constructed as an addition to the other schemes shown on our map people's perceptions of the area will change. This will severely impact the tourist industry and for many people their affection for the landscape will disappear.

2.624 Effects on the overall character of the landscape: Solar developments change the landscape and as already described the introduction of so much solar infrastructure in to an area changes both the physical fabric and perceptual qualities. East Pye, if permitted, in combination with the other schemes identified on our map would modify and alter the key characteristics of the landscape over a large area in South Norfolk.

These cumulative modifications would be substantial enough to transform an attractive, rural, agricultural and relatively tranquil and extensive stretch of countryside in to a landscape in which artificial, industrial structures are perceived as dominant.

The landscape character of the Tas Valley, its tributary valleys and the surrounding countryside over a broad section of land stretching for many miles south of Norwich, would suffer a severe and negative transformation.

2.625 Cumulative impacts resulting from other (non solar) developments

The ES includes 6 non solar schemes in its very short "short list" for cumulative effects assessment - 4 residential developments and 2 "hybrid" schemes that include land for residential and employment development and other uses.

Because of the time constraints on our volunteer authors we have not considered residential and other developments in our assessment of cumulative effects because there are a very large number of sites allocated for housing in the Greater Norwich Local Plan (GNLP) that fall within the 5 km search area on ES Figure 7.5.1 (Zone of Theoretical Visibility with View Locations Overview Sheet - DTM and DSM). The ZTV clearly

shows that many of these sites would be impacted by views of the scheme. Therefore for the ES to only consider 4 of these sites grossly underestimates impacts.

The current housing target in the GNLP, which includes the South Norfolk Village Clusters Housing Allocations Plan, is for 49,500 new dwellings to be built across the entire plan period 2018 – 2038. This target will be increased substantially and the plan is currently being revised to take account of the change that the current government made to the formula for calculating housing need (the standard method). The plan period is also being extended to 2045.

Nearly all of the villages included within the 5 km search area shown on Figure 7.5.1 have sites allocated for housing and as already stated several of these would have a view of the East Pye scheme and/or other solar schemes shown on our map. Therefore if the intention of the ES was to evaluate residential sites in its assessment of cumulative effects it should have taken account all of these sites.

One example of a site allocation in the South Norfolk Village Clusters Housing Allocations Plan that would have a view of the East Pye scheme (there are many more) is the site at Millfields, Hempnall which is allocated for 15 houses. This site is on top of a hill with a clear view westwards to Site 5 (the nearest site 5 solar field is under 500 metres away). There would be intervisibility between these 2 developments.

2.626 The sites put forward by landowners in the Call for Sites with regard to the current revision of the GNLP include 2 large sites adjacent to East Pye sites. One is a field alongside the B1527 to the east of sub-site 5B and the other is alongside Site 6 south of the B1527. If these sites are included in the cumulative impact assessment, together with many others in the local area that have been put forward in the Call for Sites phase of the GNLP plan revision, the overall impact of cumulative impacts from proposed and existing developments within South Norfolk reaches an unsustainable level.

2.627 However even without considering the new sites for housing that may be allocated in the revised GNLP South Norfolk is facing severe development pressures from solar proposals, existing housing allocations and other energy infrastructure projects. These include all the sites on our cumulative impact map, the allocated sites in the GNLP for housing development including those in the South Norfolk Council Village Clusters Housing Allocations Plan, the proposed new Norwich to Tilbury pylon line, the expanded substation at Swardeston and the converter buildings south of the Norwich southern by-pass. There are also other solar farms proposed for South Norfolk at Colton, Bawburgh, Burston and Dickleburgh that are not situated within the 400sq km area of our map.

If East Pye is assessed in combination with all of these developments the cumulative landscape impacts become overwhelming. If all these developments are built out the landscape character would not only be transformed it would be destroyed. Some have already been built and many others have received planning permission and will go ahead. Therefore East Pye should not be permitted because the additional huge impacts it would create could tip transformation of the landscape in to destruction of the landscape.

2.628 Footnote re. Cumulative Impacts on NCA 83: South Norfolk and High Suffolk Claylands

The ES dismisses the likelihood of cumulative impacts on the South Norfolk and High Suffolk Claylands in paragraph 7.11.8*: "The cumulative assessment does not consider effects on NCA 83: South Norfolk and High Suffolk Claylands as no significant effects were predicted during the Operational Phase*"

The ES limited its consideration of cumulative impacts to a very small number of developments and as a result, as already stated, failed to assess cumulative landscape effects over the wider area. We have looked at those impacts over a 400sq km area within South Norfolk and most of this area is located within NCA 83 (South Norfolk and High Suffolk Claylands). This NCA stretches southwards in to north and mid Suffolk and therefore also includes within its boundaries the Eco Power proposal for a 250-megawatt solar farm and battery storage project on 2,100 acres of land in Eye, Yaxley, Occold, Gislingham, Mellis, Brome, Stuston, Thrandeston, Burgate, and Thornham Parva.

If the Eco Power development is considered in combination with all the developments we have referenced, including East Pye, then there is a powerful case for assessing cumulative impacts across the whole of NCA 83 because the character of the landscape in this NCA would be substantially altered if all, or even some, of the proposed solar sites we have identified, which are additional to existing sites and approvals, are permitted.

It is a shortcoming of the ES that its cumulative impacts focus (just like its Residential Amenity assessments) is so narrow and limited.

2.63 Intra-Project Cumulative Effects

Cumulative Effects can also occur within a project. Both the intra-project cumulative landscape and visual effects and the in-combination effects are especially pronounced in the East Pye scheme.

The East Pye scheme includes 10 sites – 9 of which will be filled with solar infrastructure. Each of these sites is a major development in its own right and many of the individual East Pye sites are far larger than existing permitted sites in South Norfolk – e.g. Site 7 dwarfs the 200 acre Bloys Grove development in nearby Swainsthorpe. The combination of 9 large East Pye sites being built within the scheme area is a major cumulative impact in its own right.

2.631 Intra-Project Cumulative Visual Effects

2.632 ES Figure 7.5.1 (Zone of Theoretical Visibility with View Locations Overview Sheet - DTM and DSM) reveals that all the East Pye sites are situated within the 3km search area. The ZTV shows that the visual impacts that would result if the East Pye

scheme was constructed will be experienced over almost all of the 3km search area and a large part of the 5km search area too. Therefore there would be a considerable amount of inter-visibility between the sites.

These intra-project cumulative visual impacts are revealed in greater detail on the ZTV maps for individual sites. For example Figure 7.5.6 Site 5 Zone of Theoretical Visibility (Sheets 1 and 2) shows clear visual intrusion from site 5 in to other sites – sites 4 and 7 in particular.

Figure 7.5.5 Site 7 Zone of Theoretical Visibility Sheet 1 shows that visual intrusion from this large site will impact all the other sites (except sites 1 and 2) and while the graded DSM sheets 2, 3 and 4 reveal less extensive visual intrusion from site 7 they still show visual impacts reaching sites 4, 5, 6 and 8
Figures 7.5.9 Site 2 Zone of Theoretical Visibility sheets 1 and 2 and Figure 7.5.10 Site 1 Zone of Theoretical Visibility sheets 1 to 7 confirm inter-visibility between Site 2 and Site 1.

Figure 7.5.10 Site 1 Zone of Theoretical Visibility Sheet 6 - With View Locations (DTM and DSM), National Grid Substation - reveals that visual intrusion from Site 1 could be experienced on site 4.

The ZTV plans for the other solar infrastructure sites (sites 3, 4, 8, 9 and 10) show overlaps of visual intrusion between sites.

2.634 Inter-visibility between sites, according to the ZTV plans occurs throughout the scheme area. Moreover the fact that the ZTV maps show visual intrusion from the sites occurring so widely both within the 3 and 5 km search areas means that the whole scheme area – a 15 km stretch of countryside from Tivetshall to Seething – will experience very significant visual effects. Numerous villages and hamlets (named in a list after the Cumulative Effects Conclusions) will be directly affected. Fields full of solar infrastructure will be as common place in the landscape as wheat and barley fields are today

In conclusion the cumulative intra- project visual effects would be substantial and adverse.

2.635 Intra-Project Cumulative Landscape Effects

2.636 Effects on the fabric of the landscape: The introduction (by East Pye) of 2,700 acres of solar infrastructure on to 9 of the 10 sites in the scheme area would radically change landscape character. The sites are dispersed over a wide area and because each of the 9 sites is a major development in its own right, many of the individual East Pye sites are far larger than existing permitted solar sites in South Norfolk, there would be intra-project cumulative landscape effects. In combination the presence of 9 large solar sites within the project boundary is a major cumulative impact.

2.637 Effects on aesthetic and perceptual aspects: The 9 large solar sites will negatively impact the beauty of a large tract of countryside and people (residents and visitors alike) will no longer regard the overall area as an attractive, rural, agricultural, landscape. At best it will become a disjointed mix of industrial infrastructure with just some remnants of its former character remaining intact.

2.638 The huge scale of the East Pye scheme would transform and alter the visual and sensory qualities of the area. The presence of solar panels up to 4.5m in height, together with security fences, inverter buildings, new tracks, substations, a BESS and a National Grid sub station in the landscape would create serious aesthetic and perceptual effects. **Effects on the overall character of the landscape:** The cumulative modifications resulting from substantial changes to the landscape on the 9 separate East Pye sites would transform an attractive, rural, agricultural and relatively tranquil landscape in to a landscape in which artificial, industrial structures are perceived as dominant.

2.64 In Combination Effects

In-combination effects refer to the impacts that result when a single receptor or receptor group experiences multiple environmental changes. For example these could be visual changes combined with loss of tranquility, increases in traffic movements etc. These changes interact to produce an overall combined effect.

2.641 The East Pye scheme, if permitted, would lead to a combination of very significant changes over the project area and surrounding countryside. These changes would include:

- A degradation of landscape character
- Loss of views
- Impacts on the setting of cultural heritage assets and conservation areas
- Impacts on bio-diversity and wildlife
- Habitat destruction
- Impacts on rivers, streams and water supplies
- Loss of tranquility
- Increases in traffic movements
- Changes to the local road system

2.642 ES Volume 1: Chapter 19 includes an In-Combination Effects Assessment (Revision 1 March 2026).

Table 19.1 relates to Effect Interactions during Construction and Decommissioning and considers them to be Not Significant for Residents / users of the local area in 8 of the 11 topic areas considered.

For the Visual topic the ES states that the In-combination Effect Significance would be Not significant to Significant (depending on the view) and the Scale and Nature would vary from No Changes to Major Adverse to Substantial, again depending on the view.

For the topic Socio-economics / Tourism industry the ES In-combination Effect Significance is assessed as Not Significant and the scale and nature of the effect is described as Minor Adverse. This is a serious underestimate of impacts on tourism. The disruption and visual disturbance resulting from a large area of countryside being transformed in to a massive long term building site during the construction phase will deter many tourists from visiting the area and impact a significant number of local businesses.

For the receptor group called "PROW and Walking Routes" (visual topic) the ES notes that the Scale and Nature of effect interactions would be Minor to Major Adverse and the in-combination Effect Significance would be Not Significant to Significant.

For the Heritage Assets Receptor Group the ES states that during construction and de-commissioning the Scale and Nature of effect interactions would be Minor to Major Adverse and the in-combination Effect Significance would be Not Significant to Significant.

2.643 ES Table 19.2 presents assessments of Effect Interactions during the Operation Phase. For the Receptor Group "Residents / users of the local area" the "In combination Effect Significance" are considered Not Significant for 5 of the 7 topic areas.

During the Operation Phase the impact of Effect Interactions on Tourism are dismissed as Minor Adverse and Not Significant. Once again this is a serious underestimate of those impacts. Tourists who currently visit South Norfolk because it is attractive, rural and relatively tranquil countryside will be put off visiting the area once it acquires a reputation as an area in which solar infrastructure is a major element in the landscape.

For the receptor group called "PROW and Walking Routes" the ES notes for the visual topic that the Scale and Nature of effect interactions during the operation phase would be Minor Adverse and the in-combination Effect Significance would be Not Significant. This is a substantial underestimate of impacts. Our field study research revealed considerable impacts on views and landscape character both at Year 1 and Year 15 and throughout the operation phase. When these impacts are combined with other environmental impacts including impacts on tranquillity, heritage assets and conservation areas this would cause highly significant and major adverse "In Combination Effects" during the operation phase.

For the Heritage Assets Receptor Group Table 19.2 covers 3 topic areas and conclusions on the "In Combination Effect Significance" vary from Not Significant to Significant and conclusions on the Scale and Nature vary from minor adverse to major adverse. For the topic "Below ground archaeology" the ES notes the Scale and Nature of in combination effects as Minor to moderate beneficial.

The Block East Pye Solar (BEPS) action group has assessed many environmental impacts, and other impacts too, and found their effects to be substantial and adverse. BEPS

conclusions are recorded in their written representation. Hempnall Parish Council fully supports BEPS conclusions including their assessments (where made) of In Combination cumulative effects.

2.644 In conclusion Hempnall Parish Council considers that in most instances the ES has underestimated "In Combination Cumulative Effects". The environmental changes that would result if the East Pye scheme was permitted would, separately and together, produce major, adverse and very significant impacts. Individuals, communities and the landscape would experience very negative consequences resulting from a combination of changes including: degradation of landscape character; loss of views; impacts on the setting of cultural heritage assets and conservation areas; impacts on bio-diversity and wildlife; habitat destruction; impacts on rivers, streams and water supplies; loss of tranquillity; increases in traffic movements and changes to the local road system.

2.65 Cumulative Effects Conclusions

Hempnall Parish Council assesses both the inter-project and intra-project landscape and visual cumulative effects that would result if the scheme was permitted as major significant and adverse.

We also consider that the In Combination Effects resulting from the schemes construction and operation would be major, significant and adverse.

The ES attempts to minimise the significance of cumulative effects. We consider that it has restricted its assessments to a study area that is far too small and a very short list of developments and in so doing has ignored cumulative impacts over the wider area and many developments that should have been evaluated. It consistently underestimates cumulative impacts including cumulative landscape effects and cumulative visual effects which its ZTV plans confirm are substantial.

2.66 The sheer scale of the East Pye scheme would itself increase cumulative impacts both within the scheme and over the wider area in combination with other developments. A scheme that stretches for over 15km from Tivetshall (to the south west) to Seething (to the north east) and includes 9 large sites proposed for solar infrastructure, dispersed over a wide area would impact many villages and communities.

During the East Pye, Dunston Hall Hearings on September 15th, 16th and 17th, 2026 the inspectors asked Hempnall Parish Council to produce a list of parishes that would be very directly affected if the East Pye application was permitted. We forwarded this list to PINS by Email on September 28th and it is reproduced below because it provides very clear evidence of the large number of communities that would experience substantial impacts including major visual, landscape and cumulative effects.

A LIST OF THE PARISHES THAT WOULD EXPERIENCE VERY DIRECT IMPACTS IF EAST PYE WAS PERMITTED

25 With Parish Councils or Parish Meetings
1 with a Town Council (Long Stratton)

26 in total

Parishes that would have solar infrastructure inside their boundaries:

1. Great Moulton - (Site 1 / National Grid Substation and part of Site 2)
2. Tivetshall - (BESS / 400kv substation / part of Site 2).
3. Wacton - (part of Site 2).
4. Tasburgh – (part of Site 7)
5. Long Stratton – (Site 4)
6. Hempnall – (part of Site 7 / Site 3).
7. Saxlingham Nethergate - (part of Site 7).
8. Morningthorpe and Fritton - (Site 5 and part of Site7)
9. Shotesham - (Site 8 and part of Site 7)
10. Brooke - (Site 9)
11. Seething - (part of Site 10)
12. Hedenham - (part of Site 10)
13. Woodton – (part of Site 10)

Parishes that would have solar infrastructure directly alongside a section of their boundary:

1. Pulham Market - (a section of its boundary is directly alongside a part of Site 2)
2. Tharston - (a section of its boundary is directly alongside a part of Site 4)
3. Kirstead – (a section of its boundary is directly alongside Site 10)
4. Shelton and Hardwick (a section of its boundary is directly alongside Site 3)

Those that would have solar infrastructure less than 1km from a section (or sections) of their boundary:

1. Howe
2. Bedingham
3. Topcroft
4. Aslacton
5. Thwaite
6. Ditchingham
7. Mundham
8. Denton
9. Alburgh

If the list is drawn up to include all individual settlements – i.e. by including the hamlets located within the boundaries of Long Stratton (Stratton St Michael and Stratton Wood Green) and by separating the settlements of Morningthorpe and Fritton (who share a parish meeting) and Shelton and Hardwick (who share a Parish Council) **the number of**

settlements directly affected increases to 30.

Footnote:
Cable route corridors would impact the whole scheme area affecting many villages very directly as well.

2.67 **Furthermore, 39 parish councils** are listed on the section 42 consultee list in regard to the East Pye Scheme because of their proximity to the development (see below)

East Pye Solar Consultation Report Appendix 7: Section 42 Consultee List (Revision 1 March 2026)

1. Thwaite Parish Meeting
2. Tivetshall Parish Council
3. Wacton Parish Council
4. Tharston and Hapton Parish Council
5. Forncett Parish Council
6. Hedenham Parish Meeting
7. Bedingham Parish Meeting
8. Netwon Flotman Parish Council
9. Morningthorpe (and Fritton) Parish Council
10. Long Stratton Town Council
11. Hempnall Parish Council
12. Aslacton Parish Council
13. Burston and Shimpling Parish Council
14. Shelton and Hardwick Parish Council
15. Shotesham Parish Council
16. Flordon Parish Council
17. Howe Parish Meeting
18. Brooke Parish Council
19. Saxlingham Nethergate Parish Council
20. Seething Parish Council
21. Kirstead Parish Meeting
22. Mundham Parish Council
23. Bergh Apton Parish Council
24. Poringland Parish Council
25. Alpington with Yelverton Parish Council
26. Tasburgh Parish Council
27. Swainsthorpe Parish Council
28. Woodton Parish Council
29. Gissing Parish Council
30. Starston Parish Council
31. Great Moulton Parish Council
32. Ditchingham Parish Council
33. Topcroft Parish Council
34. Dickleburgh and Rushall Parish Council
35. Denton Parish Council

36. Earsham Parish Council
37. Redenhall and Harleston Parish Council
38. Pulham St Mary Parish Council
39. Alburgh Parish Council

A Section 42 consultee list includes the mandatory compilation of local authorities that a developer must consult before submitting an application for a Nationally Significant Infrastructure Project (NSIP) under Section 42 of the Planning Act 2008.

The list above should include Pulham Market Parish Council but this village does not seem to be included in the Section 42 list. If it was included the total increases to 40.

As all of these parishes were consulted because of their close proximity to the scheme the applicant must have considered that the scheme would or could impact them.

Clearly this scheme would have enormous impacts on many communities including the 26 in our list of parishes directly affected plus the 13/14 additional parishes that were on the Section 42 list.

Furthermore the scheme's impacts would reach beyond these 40 villages because of cumulative impacts in combination with other developments and because it would transform the landscape over a large area of countryside – a landscape that is enjoyed and appreciated by so many people, residents and visitors.

2.7 Impacts on Conservation Areas and Listed Buildings

2.71 The following conservation areas / parts of conservation areas are close to the proposed East Pye solar sites:

- Parts of the conservation area in Brooke are close to Site 9
- Parts of the conservation area in Fritton are close to Site 5b
- The north western boundary of the Hempnall conservation area is close to parts of Sites 7b and 7c
- The conservation area covering Saxlingham Green is close to Site 7d and 7f (very close in places) and the Saxlingham village conservation area is also quite close to a part of Site 7d
- Parts of the conservation area in Shotesham are close to Site 8b
- Parts of the conservation area in Wacton are close to Site 2c

2.72 The conservation areas in Seething, Hedenham, Howe, Newton Flotman and Long Stratton and Long Stratton are in the vicinity of the development but are not as close to the solar sites as those lifted above.

2.73 Hempnall Parish Council considers that the East Pye development would pose a number of threats to conservation areas, during both the construction and operation phases of the scheme.

It could directly affect the features within a conservation area if for example the widening of a road through a conservation area to accommodate construction vehicles required roadside verges, hedges and walls to be removed. In this context Saxlingham residents are particularly concerned about potential impacts on Church Hill an historic and picturesque road.

2.74 The ES ZTV map Figure 7.5.1 Zone of Theoretical Visibility with View Locations clearly shows that visual intrusion of solar infrastructure would impact those conservation areas that are close to the scheme and could impact other conservation areas in the vicinity of the scheme.

2.75 There would be less direct impacts too. For example the Shotesham, Saxlingham Green, Saxlingham village and Fritton conservation areas are not only delightful places because of the features directly present in those areas. Their appealing character is also due to the fact that they are located within the context of an attractive, rural and relatively tranquil wider landscape. If this landscape is industrialised by solar infrastructure then this would diminish the overall character of the landscape and the conservation areas located within it. Many people visit these villages to enjoy walks in the conservation areas and surrounding countryside – their perceptions of the conservation area would be negatively impacted by the presence of large solar fields close by. The setting of these conservation areas would no longer be an agricultural rural landscape because their boundaries would be close to major energy infrastructure.

2.76 Hempnall Parish Council has not carried out a detailed assessment of impacts on listed buildings but this topic area is covered by Block East Pye Solar (BEPS) in its written representation and we endorse BEPS conclusions on impacts on heritage assets which would be substantial if the scheme was permitted.

2.8 Impacts on rural tranquil landscapes

2.81 The ES provides a version of the CPRE Tranquillity map (APP 083 - Figure 7.8 CPRE England's Tranquillity Plan) on which the legend has been changed from the original CPRE map to a colour scheme heavily reliant on the use of blue, purple and green. This colour scheme obscures important information that the original CPRE legend makes very clear.

2.82 The inadequate presentation of CPRE tranquillity data on the plan published in the ES was reported (by CPRE Norfolk) to Graeme Willis at CPRE national office. Mr Willis has been closely involved in CPRE work on tranquillity for many years and upon seeing the way in which the CPRE tranquility data had been shown in the ES he provided the following critical note (reproduced in full in italics below) to CPRE Norfolk which was forwarded as an attachment to Tim Hole a casework officer at PINS in an email on June 10th, 2026 by Barbara Adamski who at that time was the CPRE Norfolk Planning Officer.

2.83 Mr Willis' comments in full

To whom it may concern - Re: East Pye NSIP Mega Solar application documents- Key DCO documents. APP-083 6.2.7.8 Environmental Statement Volume 2: Figure 7.8 CPRE England's Tranquility Plan.

Background note

My name is Graeme Willis. I am a policy lead working on land use, farming and environmental land management. I have worked on tranquillity at Campaign to Protect Rural England (CPRE) since 2006. I worked with the research team led by Northumbria University to make the 2007 national tranquillity mapping GIS data set freely available under licence – as well as publishing the underlying methodology - to support the analysis of tranquility for a wide range of development and research projects. The GIS dataset has since been licensed for use some 140 times to bodies ranging from Government departments, Local authorities to environmental consultancies and academic and other research ognanisations. In particular, I prepared the licence for the use of the data set to Stantec on 15 September 2025 as I understand it for the preparation of the Environmental Statement for this application.

David Hook of CPRE Norfolk brought the map submitted above as part of the application to my attention. I have compared the map as presented with the 2007 National Tranquillity map published by CPRE based on the same 2007 GIS data set as used in this instance in particular the more granular county map of Norfolk produced by Northumbria University and also published by CPRE in 2007. This map of the county covers the area shown in Figure 7.8.

I wish to make the following observations:
Map title

The title refers to CPRE England's Tranquillity Plan. This should not be interpreted as a map created by CPRE or solely for CPRE. The GIS licence agreement makes clear in Guidance for use of the data (ii) Interpretation that "The findings of this research are the results of an independent study" The licensing of data is managed by CPRE for CPRE, Natural England and Northumbria University all of which hold joint intellectual property rights. The legend on the map makes it clear this map was developed for CPRE and Natural England by Northumbria University and is correct and is as required by the licence agreement. Natural England subsequently used the 2007 tranquillity mapping data extensively for assessing tranquillity as an experiential quality in their National Character Area analysis.

Map colour scale

The colour scale on Figure 78 has been altered from the red (least tranquil via orange to yellow as the mid-point to light then deeper green (most tranquil) as used in the original

2007 output maps. The original mapping used colours that are bright and provide a strong contrast so that areas of low tranquillity are immediately visible as are those of the higher to highest tranquillity. The 500m by 500m output squares are on the Norfolk county map visible despite the relatively low granularity. The original mapping makes it possible to see at a glance the line of main and lesser roads as well as large and smaller settlements in the change of colouration to yellow/orange/red as they are key influences on the tranquillity scores.

There may be legitimate reasons for the change of colour scale but no explanation has been given on figure 7.8. This may be provided elsewhere. The colour scale chosen runs from deep purple (least tranquil) through blue at the mid-point to blue/green, light green then yellow (most tranquil). The colour palette is very muted - not bright- and it is much more difficult to see contrast: the purple of low tranquillity areas alters to blue at the mid-point. Purple and blue are close to each other in the colour wheel so there is limited transition in colour and reduced contrast even between areas of negative tranquillity and those with relatively high tranquillity. Also, the green of the more tranquil areas fails to contrast strongly with the blue of more neutral areas as blue and green as colours are close to each other on the colour wheel. Again, this reduces contrast and clarity. Areas of high tranquillity appear as lighter to darker green on the 2007 Norfolk county map but do not appear here at all in the yellower end of the spectrum on the new colour scale, which is surprising.

I note also that in the key the dotted bars denote the 'range of tranquillity in the search area' but do not seem to include the lighter green 500mx500m squares both within the red overlay or beyond it within the blue dotted lines.

I also observe that the overlay in heavy red with numbering in conjunction with the marked loss of contrast and clarity makes it difficult to interpret what the underlying colour to each square of the development footprint might be.

The last point I wish to make on the colour scale chosen is to mention the excellent and highly detailed work done by Land Use Consultants most recently for Natural; Resources Wales on mapping aspects tranquillity across the country: Green, C., Manson, D. and K. Chamberlain/ Land Use Consultants, Tranquillity and Place Report No: 569 (version 2) 2022, Cyfoeth Naturiol Cymru/Natural Resources Wales. This work includes a range of maps with different colour scales, that is they do not use the 2007 England tranquillity mapping red/green colours and indicates what should be possible. I would argue that they successfully use strong contrasting colour from black to yellow to provide clear mapping even at a national scale – see for example figures 46,49 , 50 and 51.

Concluding comments

I believe the map presented in figure 7.8 is difficult to interpret if it's meant to aid the assessment of tranquillity underlying the development footprint and beyond. This is so even with the limited amount of information presented –for example, there is only a very

faint underlay of roads that are visible on magnification. This is primarily due to the colour choice and lack of colour contrast. .

While the 2007 maps published by CPRE were at the time left deliberately simple – the choice was made not to include underlying roads, urban outlines, infrastructure. Even when such features are added back to the mapping in detail, as is perfectly possible, the colouration of the output squares on the tranquillity square is I would argue very clear.

Graeme Willis

9 June 2026

2.84 Mr Willis has provided a very detailed explanation of how the colours used on the ES plan make the map (figure 7.8) difficult to interpret and it is very concerning that, in his words, "*Areas of high tranquillity appear as lighter to darker green on the 2007 Norfolk county map but do not appear here at all in the yellower end of the spectrum on the new colour scale, which is surprising*". i.e. Figure 7.8 fails to reveal the areas of high tranquillity.

2.85 Areas of high tranquility are present in the scheme area and we have obtained permission from CPRE to use the data to produce a tranquillity map of the area using the original legend colouring (see HPC-APP07 – Fig02 – CPRE Tranquillity Mapping). On our map the colour contrast enables immediate identification of those areas that are most tranquil - this is not the case on the ES plan. Take, for example, Hardwick Airfield to the south east of Site 3 – our map clearly identifies parts of this area as "most tranquil" (bright green) whereas the ES plan fails to show this – there is no yellow colouration (the ES colour for "most tranquil") in the area south east of Site 3 on ES Figure 7.8. Mr Willis is correct the ES plan fails to reveal areas of high tranquility that are present in the area.

2.86 If the ES version of the CPRE tranquillity map was deliberately designed to obscure detail and not show areas of high tranquillity then this is a major issue which casts doubt not only on the integrity of figure 7.8 but more widely on the integrity of the ES as a whole. If the content displayed on ES maps, plans and tables and in the explanatory text has been deliberately presented in a way that hides, distorts or misrepresents information in order to demonstrate that the impacts of the scheme are less than they really would be this is a very serious matter and needs to be examined further by the Planning Inspectorate.

2.87 Furthermore Mr Willis makes the point that:" *The original* (i.e. CPRE) *mapping makes it possible to see at a glance the line of main and lesser roads as well as large and smaller settlements in the change of colouration to yellow/orange/red as they are key influences on the tranquillity scores."* This is in sharp contrast to ES figure 7.8 *on which* the background details are not at all clear - it is difficult to locate settlements roads etc.

It is perfectly possible, as Mr Willis explained, for the background features to be clearly visible on maps with overlay information and all of the Hempnall Parish Council maps

(including our CPRE Tranquillity map) in the appendices of this written representation clearly show the background, underlying details.

2.88 ES figure 7.8 is unclear, misleading, confusing and misrepresents the CPRE data by not revealing areas of high tranquility. Therefore any assessments made in the ES on impacts on rural tranquillity based on ES Figure 7.8 must be considered as flawed.

2.89 Hempnall Parish Council's assessment of impacts on rural tranquillity

2.891 These assessments are supported by the information shown on our clear and accurate CPRE Tranquillity Map (HPC – APP07-Fig02)

(HPC – APP07-Fig02) which uses the correct original CPRE legend colouring clearly reveals that the East Pye sites located away from the A140 are situated in, or close to, areas shaded green on the map - i.e. at the most tranquil end of the spectrum.

2.892 The majority of the areas enclosed within sites 3, 8, 9, and 10 are in the Study Area Range of Tranquillity 1 to 3 (at the most tranquil end of the spectrum). They also have very tranquil sections of countryside alongside or close to their boundaries – e.g. to the south east of Site 3; to the north, south, east and west of Site 10; to the south and north west of Site 9 and to the north and north west of Site 8.

2.893 Large areas within Site 7 are in the Study Area Range of Tranquillity 1 to 3 (at the most tranquil end of the spectrum) including the majority of the areas within sub-sites 7I, 7J, 7K, 7L 7E, 7F, 7G, and 7H. There are also sections of tranquil countryside alongside or close to the boundaries of these sub-sites especially to the north and south of sub-sites 7I, 7J, 7K, 7L 7G, and 7H.

2.894 Parts of site 5 are also in the Study Area Range of Tranquillity 1 to 3 (at the most tranquil end of the spectrum).

2.895 Sites 1, 2 and 4 are closer to the A 140 and are also affected by the presence of the Norwich to London railway line to the west. These sites are shown as less tranquil on our map.

2.896 Rural tranquillity isn't just about noise levels and the CPRE tranquillity maps take in to account a number of other factors that contribute to the sense of calm experienced in a tranquil area including positive factors, such as the presence of sweeping views, open countryside, natural and wild landscapes, and undeveloped horizons, as well as negative factors such as noise pollution and visual intrusions resulting from the presence of features such as artificial and industrial structures, light pollution and busy roads.

Introducing large amounts of solar infrastructure in to a tranquil area blocks open views, creates developed horizons, introduces noise pollution and creates an industrialised landscape in which artificial structures are a pervasive feature.

A mega solar scheme as large as East Pye would eliminate the sense of tranquillity and the feeling of "getting away from it all" over a large area of countryside in South Norfolk. Extensive sections of calm attractive rural countryside would be transformed in to an industrialised landscape.

2.897 Impacts on tranquillity would not be limited to the solar sites. As already mentioned many of the solar sites have very tranquil areas close by and these would also suffer a loss of tranquility if the scheme was permitted resulting due to their close proximity to solar infrastructure.

2.898 Numerous Public Rights of Way that cross or run alongside all of the solar sites, whether located in the more tranquil areas or not, would not only experience noise and disruption during the construction phase but would also suffer a loss of tranquillity during the operation phase. Each Tracker solar panel generates approximately 58db of sound when it moves. This isn't much but cumulatively mounts up and a whole field full of tracker solar panels has the potential to create significant levels of noise.

The presence of security fencing and security cameras close to or alongside PROW also destroys the feeling of "getting away from it all". This is a big impact. Almost everyone who enjoys walking in the countryside will definitely feel a loss of something special and precious when their strolls through the countryside are caught on camera. Their perception of being in a tranquil place will be destroyed.

2.899 The ES, in LVIA Appendix 7.3, Table 4.1, says that: *"tranquillity would be partially restored as the level of activities reduces"* post construction. Yes, the noise generated during construction will disappear but, as already stated, rural tranquillity is dependent on a number of factors it's not just about noise and those factors will remain relevant throughout the operational phase of the scheme. Views will remain blocked, industrial infrastructure will continue to cover large areas of countryside, people's perception of being in a calm rural place and of "getting away from it all" will have been eliminated.

Footnote
Hempnall Parish Council has gone into detail about the faults with the ES tranquillity map because this is not an isolated case as many of the ES maps and plans are unclear, confusing and hide background details (location of settlements, roads, woods etc).
In our response to the statutory consultation we supplied a number of examples of how the applicant's maps were inadequate, unclear, misleading at times and inaccurate in places and we still consider this to be the case in regard to a number of the maps and plans included with the application. These inadequacies should really be corrected – can the examination be paused until this has been done?

2.9 Impacts on the character of local roads

2.91 Hempnall Parish Council does not possess the resources to examine all of the potential impacts on the local road system that would result from the construction of the scheme. However we offer the following general comments on how alterations to the roads, to accommodate the very large vehicles that will be used to transport construction materials, would impact the character of those roads and the character of the countryside immediately adjacent to those roads.

2.92 The minor roads in South Norfolk contribute a great deal to the character of the landscape and countryside. Because much of the land in South Norfolk was enclosed long before the era of Parliamentary Enclosure field patterns are much more irregular than those resulting from Acts of Parliament in the eighteenth and nineteenth centuries. This irregular field pattern had an impact on the routes followed by country lanes in South Norfolk which typically are very "bendy" with numerous right angled turns. The roads had to include a large number of twists and turns because they needed to go around the boundaries of a large number of irregular shaped fields.

2.93 If these bendy narrow minor country roads are widened and the width of roadside verges reduced to enable the passage of very large vehicles this will change the character of those roads significantly. Impacts will be even greater where it is necessary to fell trees and remove hedgerows.

2.94 ES (Table 11.13: Construction Vehicle Routeing - Solar PV Sites) provides details of proposed access routes to the solar sites. Numerous minor roads are mentioned in this table including lovely country lanes such as the Krons, Fairstead Lane, Busseys Loke and Fylands Road. Any changes to the character of these country lanes and to the other minor roads mentioned in Table 11.13 to facilitate the construction of the scheme would in every instance be negative and the cumulative impact resulting from modifications to multiple roads would have a significant impact on landscape character in this part of South Norfolk to which the existing appearance of country lanes makes a very positive contribution.

2.95 The ES East Pye Solar Outline Construction Traffic Management Plan (Revision 1 March 2026) includes in section 6.2 details of the Routes for Abnormal Load Movements and in section 6.2.2 it specifies that for Sub-Site 7F abnormal loads would journey: *"southbound on B1332, westbound on Stoke Road, Poringland Road, Long Lane, south on Norwich Road, The Street, Broaden Lane, east on A40. Depart on same route in reverse."*

This means they would pass through 3 conservation areas: a section of the Shotesham conservation area close to Shotesham Hall; The Saxlingham Nethergate Village conservation area and the western edge of the Saxlingham Green conservation area. Serious concerns have been raised by Saxlingham residents about impacts on Church Hill

and any road widening or removal of roadside features in any of the conservation areas must be regarded as a significant negative impact.

2.96 Haul Roads
Three internal haul routes are proposed to connect the Sites. While it is stated that these routes will be temporary for construction only the temptation, once built, would be to retain them to facilitate site maintenance during the operation phase. The haul routes would, according to ES: Chapter 11 – Transport and Access paragraph 11.6.28: *"connect Sub-Sites 7A-F using CRC 11, Site 12, Sub-Sites 7G-L and Sub-Sites 8A-B."*

This means that they would pass through lovely stretches of countryside that are currently (in many places) tranquil and "off the beaten track". Sections of hedging would have to be removed and ditches filled in to construct these new roads. Their impact on the local countryside would be substantial and adverse. Hempnall Parish Council objects most strongly to the haul route proposals and has communicated its opposition to the local Highways Authority (Norfolk County Council) and at the Issue Specific Hearings held at Dunston Hall.

2.97 Indicative Access Points and Routes

There are 10 maps in APFP 5(2) (a); Application Document Reference 6.2.4.1 / Figure 4.1 Indicative Masterplan. The Index Plan covers the whole scheme and a further 9 sheets cover different sections of the proposal. What they all have in common is that they exhibit a preponderance of Indicative Access Points and Indicative Access Routes. Because these access points and routes are labelled as indicative it is not at all clear whether they are included on these plans as possibilities or if they are the locations where access points and routes would actually be constructed if the scheme was permitted. This lack of clarity is a yet another flaw in the maps and plans presented for examination.

The parish council has serious concerns about the use of the description "Indicative Access Points" because this is not specific enough to identify exactly where access to sites would be facilitated. A planning application of this magnitude should include details of the exact location of access points. The failure to do this is one of the many flaws, inconsistencies and inaccuracies contained within the applicant's maps, diagrams, photos and maps. The application should not be examined until these inadequacies have been corrected. The applicant's maps are especially unclear and flawed and our LVI Case provides details of a number of these deficiencies.

3.0 Impacts on Light Pollution

We also discuss the potential Light Pollution impacts of the East Pye scheme in **Section 5.14** in the context of National decision-making policy P3.

3.1 The ES acknowledges that: *"the Order Limits are within a Rural Dark Landscape as defined in Norfolk County Council's Environmental Lighting Zones Policy"* A study of

the CPRE Interactive Light Pollution Map (available to view on the CPRE website) reveals that most of the scheme area is in the 3 "darkest" legend categories and several of the sites are completely or partially in the darkest category. The area in and around Sites 5, 7, 8 and 10 is especially free from light pollution.

3.2 We take issue with the statement in ES paragraph 3.1.6 of the East Pye Solar Environmental Statement Volume 3: Appendix 7.11 - Lighting Strategy Revision 1 March 2026. It reads: *"Lighting is present within the surrounding villages. These typically feature common sources of illumination such as streetlights, shopfront lighting, and domestic lighting from residential properties. Individual domestic dwellings and farms are located close to the Order Limits. These are expected to feature some form of domestic lighting, such as wall/façade mounted luminaires or floodlighting".*

Most of the settlements in and around the scheme area are unlit, except for Long Stratton, and there are very few shops, so shop front lighting is not significant. Many farms are unlit and the owners of many residential properties choose not to employ external lighting. It is incorrect to expect that these premises would feature some form of domestic lighting or floodlighting. Most local residents (and visitors too) cherish the dark skies and dark landscapes in South Norfolk and want them to be protected. This was evident at the hearings held at Dunston Hall (September 15 to September 17) when a large number of speakers referred to light pollution from the scheme as one of their key concerns.

Visible light pollution in the scheme area is really only evident in and around Long Stratton and at the lit roundabout at the junction of the A140 and B1527. Light pollution between Tasburgh and Newton Flotman, along the A140, has just been significantly reduced because the street lights along this section of the road have been switched off.

3.3 Environmental Statement Volume 3: Appendix 7.11 - Lighting Strategy Revision 1 March 2026 makes it quite clear that: *"Lighting is required for safe undertaking of construction and decommissioning activities, alongside facilitating safe access for the works."* **And that:** *"It is expected that operational lighting in the form of motion sensing lighting will be required for components of the Scheme, namely, the National Grid Substation, BESS and 132kV and 400kV Project Substations*".

3.4 While the ES seeks to reassure that lighting will only be switched on when needed and that it will be provided by using full cut off, flat glass lamps (pointing directly downwards) the construction and operation phases of the scheme would introduce a considerable amount of new artificial lighting in to previously unlit places and this would produce significant adverse impacts. Even the best designed luminaries produce some light pollution.

4.0 Impacts on Public Rights of Way

These would be major and adverse and are considered in great detail under our assessment of visual effects, in our comments on NPPF decision making policy TR8 and in the narrative walk descriptions.

5.0 The Planning Balance, Relevant Policies and Guidance Documents and Overall Conclusion

5.1 NPPF

The latest version (August 2026) of the National Planning Policy Framework (NPPF) covers plan making policies separately from decision making policies.

5.11 National decision-making policy **N2: Improving the natural environment** states in section 1 that in order: *"To contribute positively to the natural environment, and support nature's recovery, development proposals should:*

> *a) Consider the environmental qualities of land proposed for development, including habitats, landscape character and the natural beauty of the countryside, and identify opportunities for those qualities to be conserved or enhanced (including through requirements for biodiversity net gain where these apply);*
>
> *b) Take into account the quality of agricultural land (including that classified as best and most versatile agricultural land, and its grade), and if significant development of agricultural land is necessary, use areas of poorer quality land where possible;*
>
> *c) Take suitable opportunities to connect to and strengthen ecological networks that extend beyond the site, drawing on the measures proposed by Local Nature Recovery Strategies, National Forest Strategies and Community Forest Plans, where present, and other relevant assessments;*
>
> *d) Conserve and enhance existing natural features of visual, historic or nature conservation value (such as established trees and hedgerows) where possible; and use appropriate landscaping to help create a well-designed place and integrate the development into its surroundings;*
>
> *e) Use green infrastructure provided as part of the scheme and nature-based solutions to secure multiple benefits: such as for biodiversity; surface water and pollution management (including maintaining flow rates and water quality); climate change mitigation and adaptation, and recreation;*
>
> *f) Minimise any adverse impacts on biodiversity and include features which support priority or threatened species such as swifts, bats and hedgehogs. Development proposals should incorporate integrated nest boxes (commonly known as swift bricks) into their construction unless there are compelling technical reasons which prevent their use, or would make them ineffective; and*
>
> *g) Ensure that green infrastructure and other features to support nature are located and designed to minimise risk of future failure, and that appropriate measures are in place for any necessary long-term management.*

In regard to a) the East Pye Solar development proposals will not contribute positively to the natural environment, and support nature's recovery, and they would adversely impact the environment over a large area of countryside producing negative impacts on habitats landscape character and the natural beauty of the countryside. We have assessed in great detail the major, significant and adverse landscape, visual and cumulative effects that would result if the scheme was permitted. The environment over the whole scheme area and the surrounding countryside would be transformed in to an industrialised landscape where artificial structures replace rural vistas.

In regard to b) the East Pye Solar development proposals fail to take into account in any meaningful way the quality of agricultural land, including land classified as best and most versatile agricultural land, and its grade, because many of the solar sites are located on good quality farmland with land owner compliance being a much more relevant factor in site selection than a consideration of land quality.

In regard to c) the East Pye Solar development proposals will not provide meaningful opportunities to connect to and strengthen ecological networks that extend beyond the site because the introduction of a huge quantity of solar infrastructure over a large area of land surrounded by security fences will be very disruptive to the connectivity of ecological networks and the free movement of some animals.

In regard to d) the East Pye Solar development proposals will not conserve and enhance existing natural features of visual, historic or nature conservation value (such as established trees and hedgerows). Our assessments show that the development would produce major, significant and adverse effects on landscape and views and the construction of the scheme, particularly the excavation of cable routes and the modification of access roads to accommodate construction vehicles, would lead to the removal of significant sections of hedgerows and the felling of a considerable number of trees.

In regard to e) much of the mitigation planting planned as part of the scheme (green infrastructure) would destroy attractive existing views and produce major negative visual effects and therefore seriously impact peoples appreciation and enjoyment of the countryside as currently experienced on recreational walks or cycle rides. Furthermore We understand that the Block East Pye Solar group (BEPS) has submitted information on the negative impacts of the development in regard to biodiversity and surface water and pollution.

In regard to f) the East Pye Solar development proposals would not minimise adverse impacts on biodiversity and BEPS research indicates the likelihood of severe negative impacts on bats and crayfish if the scheme was permitted

In regard to g) our study of the Island Green solar site at Trowse near Norwich (photos and notes provided in this written representation) which is now 10 years old provides

little hope that the Island Green, East Pye Solar development proposals will result in the provision and successful long term management of mitigation planting, green infrastructure, and other features to support nature. The Trowse site was supposed to develop in to a bio-diverse hay meadow – in reality (after a decade of mitigation) it resembles a ragwort covered semi desert.

Therefore Hempnall Parish Council concludes that the East Pye application does not accord with National decision-making policy N2: Improving the natural environment. In all respects it contradicts that policy and this provides grounds for a recommendation that the application is refused.

5.12 National decision-making policies HE4, HE5, HE6 and HE7 stress the importance of conserving heritage **assets** and protecting their settings. BEPS has provided, in its written representation, its conclusions on the harm that the East Pye proposals would cause to heritage assets and these conclusions are supported by Hempnall Parish Council.

National decision-making policy **HE9: Conservation areas** states, in section 1, that: *"Development proposals within or affecting the significance of conservation areas should:*

a) Retain and conserve buildings and other features which make a positive contribution to the character or appearance of the conservation area where possible"

The East Pye development proposals will directly impact some of the conservation areas located in the scheme area and surrounding countryside as a result of the modifications to roads that pass through those conservation areas which would be required to accommodate construction traffic. These modifications would alter the character of the conservation area – for example through the loss of roadside verges as a result of road widening. These kinds of negative impacts must be added in to the list of dis-benefits resulting from the scheme. Features that make a positive contribution to the character or appearance of these conservation areas would suffer adverse impacts.

Conservation areas such as Saxlingham Green and Fritton (including the common) are delightful and beautiful places. Saxlingham Green is close to Site 7 and Fritton is close to Site 5. While direct visual impacts of solar sites may be restricted in places Figure 7.5.5 Site 7 Zone of Theoretical Visibility Sheets 1 and 3 reveal visual impacts affecting Saxlingham Green and Figure 7.5.6 Site 5 Zone of Theoretical Visibility Sheets 1 and 2 show visual impacts affecting Fritton (including the common).

A number of other conservation areas would suffer direct visual impacts and these conservation areas are listed under (give 2.whatever) The Greater Norwich Local Plan. The ES ZTV map Figure 7.5.1 Zone of Theoretical Visibility with View Locations clearly shows that visual intrusion of solar infrastructure would impact these conservation areas

The East Pye development would also result in other impacts on conservation areas. For example the delightful character of Saxlingham Green and Fritton is not only a result of the features directly present in those areas it is also due to the fact that they are located within an attractive, rural and relatively tranquil wider landscape context. If the landscape is industrialised by solar infrastructure then this diminishes the overall character of the landscape and the conservation areas located within it. Many people visit Saxlingham Green and Fritton to enjoy walks in the conservation areas and surrounding countryside – their perceptions of the conservation area would be negatively impacted by the presence of large solar fields close by.

The East Pye application does pose a threat to features which make a positive contribution to the character or appearance of the conservation area.

5.13 National decision-making policy TR8: Public rights of way, includes the following wording in 1a and 1b: *"Development proposals should: a) Protect and enhance the network of public rights of way, including through suitable diversions agreed with the highway authority; and b). Take opportunities to extend, link or improve the quality of existing routes where this enables one or more of the following: i.) Improved access to green spaces and the countryside;* ii.) *New direct and circular routes and connections between local and long-distance footpaths, bridleways and cycle routes*

The East Pye proposals would not "*Protect and enhance the network of public rights of way".* We have already explained how solar infrastructure and mitigation planting would destroy views and how paths hemmed in by mitigation planting and security fencing would become narrow, monotonous corridors overlooked by security cameras. This is not protecting and enhancing the PROW network.

Constructing the scheme, including the excavation of cable route corridors, would require PROW to be closed and in some instances diverted. In no way can this be viewed as improving: *"the quality of existing routes".* Access to green space and the countryside would be disrupted and the existing good connectivity between routes would be broken.

Over 30km of PROW cross or run alongside the solar sites and many other stretches of PROW in the area would experience views of solar sites. The East Pye scheme would result in very significant harm to the PROW network

5.14 National decision-making policy P3: Living conditions and pollution section 2 includes the following statements:

Development proposals should:

d) "maintain the character of tranquil areas (those areas that have remained relatively undisturbed by noise from human sources and are prized for their recreational and amenity value for this reason)"

AND
e) "Limit any adverse impact from artificial light on local amenity, intrinsically dark landscapes (those areas entirely, or largely, uninterrupted by artificial light) and nature"

The CPRE Tranquillity map that we have provided (HPC – App07 Fig. 02) with the correct original CPRE legend colouring (unlike the version supplied in the ES) clearly reveals that the East Pye sites located away from the A140 (i.e. Sites 3, 8, 9, 10, and parts of Site 5 and Site 7) are located in areas shaded green i.e. at the most tranquil end of the spectrum, whereas Sites 1, 2, and 4, being closer to the A 140 and the Norwich to London railway line, are relatively less tranquil.

Numerous Public Rights of Way that cross or run alongside solar sites in all parts of the scheme area would, if the scheme was permitted, not only experience noise and disruption during the construction phase but they would also suffer a loss of tranquillity during the operation phase. Each Tracker solar panel generates approximately 58db of sound when it moves. This isn't much but cumulatively mounts up and a whole field full of tracker solar panels has the potential create a significant amount of noise.

Moreover tranquillity isn't just about noise and the CPRE tranquillity maps take in to account a number of other factors that contribute to the sense of calm experienced in a tranquil area including (amongst others) the presence of open views, an absence of artificial structures and low levels of light pollution.

Introducing large amounts of solar infrastructure in to a tranquil area, as we have mentioned many times in this submission, would block open views and eliminate the sense of tranquillity and the feeling of "getting away from it all" because a calm attractive rural setting would be replaced by an industrialised landscape.

Norfolk is one of the darkest counties in England, its rural areas are relatively free from light pollution. Most of the East Pye scheme area is classified as Rural Dark Landscape in Norfolk County Council's Environmental Lighting Zones Policy. This classification is clearly appropriate and justified and supported by evidence available by studying the CPRE interactive light pollution map. Only in and around Long Stratton and at the lit roundabout at the junction of the A140 and B1527 is there significant light pollution. Light pollution between Tasburgh and Newton Flotman, along the A140, has just been significantly reduced because the street lights along this section of the road have been switched off.

While the ES seeks to reassure that external lighting associated with the East Pye scheme would not be intrusive and would only be switched on when needed the introduction of any outdoor lighting into the rural dark landscape of the scheme area would cause some light pollution and reduce the sense of tranquillity.

The East Pye scheme is not compliant with sections of **National decision-making policy P3** because it would, if permitted, not *"maintain the character of tranquil areas",* it would in fact have exactly the opposite effect. Furthermore the external lighting that

would be present both during the construction and operation phases of the scheme would have an adverse impact by introducing artificial light in to an, intrinsically dark landscape.

In summary the East Pye application does not comply with sections of a number of the decision making policies in the August 2026 NPPF. **The NPPF provides many powerful reasons why the East Pye proposals should not be permitted**

5.2 Greater Norwich Local Plan

5.21 South Norfolk Council, Broadland Council and Norwich City Council jointly produce a local plan. The current version, The Greater Norwich Local Plan (GNLP), was adopted in March 2024 having been declared sound by the Planning Inspectorate following a rigorous Examination in Public (EIP).

5.22 GNLP Policy 3 Environmental Protection and Enhancement, The Natural Environment paragraph 191 requires: *"development to respect local landscape character based on existing and any future landscape character assessments, avoiding harm to locally valued landscapes from inappropriate development."*

Our assessments of the landscape, visual and cumulative effects of the East Pye application clearly show that it would cause harm to the local landscape, both within the scheme area and over a wider area too. This harm would be major and adverse and so substantial that it would result in the transformation of large sections of attractive, rural countryside into an industrialised landscape in which artificial structures (solar infrastructure) are the dominant element. The East Pye Mega solar proposals therefore do not respect local landscape character and would harm locally valued landscapes and therefore they contradict GNLP Policy 3 as set out in Paragraph 191. Hempnall Parish Council asks the Planning Inspectorate to support our objection to the East Pye application based on the wording in Policy 3, which is a policy that PINS found to be sound as recently as February 2024.

GNLP Policy 3 Environmental Protection and Enhancement, The Natural Environment, clearly states that development proposals should respect landscape character and retain important views and features. The East Pye application does not respect landscape character and if permitted would destroy important views and features.

5.23 GNLP Policy 3 Environmental Protection and Enhancement, The Built and Historic Environment, paragraphs 182 and 184 recognise the important contribution that heritage assets, including conservation areas, make to the character of the GNLP area and a part of paragraph 184 reads as follows*: "it is important to recognise that the historic character of the area is made up of a multitude of heritage assets. Individually, some may be more important than others, but even the lesser ones are important in contributing to overall character and quality. All the different elements of the historic environment need to be*

taken into consideration and conserved and enhanced where possible as part of the development of the area."

5.24 Hempnall Parish Council considers the East Pye application would pose a threat to heritage assets, including conservation areas, during both the construction and operation phases of the scheme as a result of impacts from construction traffic and impacts on the setting and charcter of listed buildings and conservation areas.

Many conservation areas are close to the proposed solar sites – for example

- Parts of the conservation area in Brooke are close to Site 9
- Parts of the conservation area in Fritton are close to Site 5b
- The north western boundary of the Hempnall conservation area is close to parts of Sites 7b and 7c
- The conservation area covering Saxlingham Green is close to Site 7d and 7f (very close in places) and the Saxlingham village conservation area is also quite close to a part of Site 7d
- Parts of the conservation area in Shotesham are close to Site 8b
- Parts of the conservation area in Wacton are close to Site 2c

The ES ZTV map Figure 7.5.1 Zone of Theoretical Visibility with View Locations clearly shows that visual intrusion of solar infrastructure would impact these conservation areas

GNLP Policy 3 Environmental Protection and Enhancement, The Built and Historic Environment states that Development proposals should: *"Avoid harm to designated and non-designated heritage assets, including their setting, having regard to their level of significance in accordance with the requirements of the NPPF and relevant policies in other Development Plan Documents and Neighbourhood Plans."* Because the East Pye scheme would harm heritage assets Policy 3 provides grounds for a recommendation that the application is refused.

5.3 South Norfolk Local Plan - Development Management Policies Document (October 2015)

5.31 The Broadland and South Norfolk website planning pages confirm that the*: "The Development Management Policies Document was adopted on 26 October 2015 and is part of the South Norfolk Local Plan. Together with the other documents that make up the Development Plan it is used to assess planning applications and guide development proposals to ensure the delivery of high quality sustainable developments across South Norfolk."* **And that:** *"The Development Management Policies Document has not been superseded following the adoption of the Greater Norwich Local Plan and is to be carried forward and used in conjunction with the adopted plan"*

5.32 SNC Policy DM 4.5 Landscape Character and River Valleys states: *"All development should respect, conserve and where possible, enhance the landscape character of its immediate and wider environment. Development proposals that would cause significant adverse impact on the distinctive landscape characteristics of an area will be refused."*

The East Pye proposals do not respect and conserve landscape character and they most certainly would not enhance it. The East Pye application would result in major adverse landscape, visual and cumulative impacts and clearly contradicts Policy DM4.5.

5.33 SNC Policy DM 4.10 Heritage Assets seeks to protect heritage assets, including conservation areas, and because the East Pye proposal would cause harm to those assets Policy DM 4.10 provides grounds for a recommendation that the application should be refused.

Both the GNLP and the South Norfolk Local Plan DMP document contain a presumption against development in open countryside and of course one of the key objectives that underpinned the creation of the planning system was to prevent the infilling of the spaces between places with houses, factories, warehouses etc. Filling open countryside with solar infrastructure, especially solar panels that reach 4.5m in height, should ring the same "alarm bells" that the ribbon development of housing triggered in the 1930s. That ribbon development led to one of the finest pieces of post war legislation – the 1947 Town and Country Planning Act. Hempnall Parish Council holds out hope that one of the basic principles of planning, preventing in-fill development by artificial structures i.e. in this instance solar infrastructure, will be upheld by PINS with a recommendation that the East Pye application should be refused.

5.4 South Norfolk Council Landscape susceptibility in relation to energy generation, storage and transmission SPD (December 2025 / Adopted February 2026)

5.41 South Norfolk Council (SNC) is increasingly concerned about the number of new energy infrastructure projects proposed for the district. These concerns were clearly expressed by the Leader of the Council (Councillor Daniel Elmer) at the East Pye hearings held at Dunston Hall recently (September 15th to September 17th).

Hempnall Parish Council shares these concerns about how energy infrastructure developments could (and do already) negatively impact the landscape of South Norfolk – hence our detailed comments on the inter-project cumulative effects that would result from the East Pye development over a wider area in South Norfolk than the ES study area.

5.42 SNC has recently adopted (February 2026) a Supplementary Planning Document (SPD) in relation to energy generation, storage and transmission in order, in the words of the council, to: "*assesses the susceptibility of the different landscapes within the South*

Norfolk district to change from a range of energy-related development scenarios including solar photovoltaic panels, anaerobic digestion plants, battery storage facilities, overhead powerlines, underground cable routes and substations".

5.43 SNC also point out that: "*The SPD is supplementary to national and local policies including policies in the Greater Norwich Local Plan (GNLP) (Adopted 2024) and the South Norfolk Development Management Policies Document (Adopted 2015)".* And they say that the SPD *"will support the Council in making informed decisions that balance progress with protection, ensuring South Norfolk remains a beautiful place to live, work, and visit".*

5.44 Table 1 on page 52 of the SPD summarises the overall susceptibility of the different Landscape Character Areas in South Norfolk to solar PV developments and for solar developments exceeding 50MW it states that all the Landscape Character Areas would either have a High or Medium-High susceptibility to developments of this magnitude. This of course includes all the Landscape Character Areas within and surrounding the East Pye development.

5.45 Island Green claims that the East Pye scheme could generate up to 500MW of electricity - ten times more than 50MW. Therefore Hempnall Parish Council considers that the development's impacts on landscape susceptibility must be evaluated as High for those landscape character areas with a Medium-High susceptibility at 50MW.

5.46 The SPD provides clear evidence that all the Landscape Character Areas within and surrounding the East Pye development scheme area would be very susceptible to an NSIP solar development of this magnitude. The threshold for NSIP solar was increased from 50MW to 100MW at the end of 2025 and East Pye is potentially 5 times greater than 100MW.

This evidence provided by SPD Table 1. is yet another reason why the East Pye application should be recommended for refusal.

5.47 The East Pye BESS would be located in SNC Landscape Character Area E2: Great Moulton Plateau Farmland. SPD Table 3 (page 54) assesses the Susceptibility to Battery Storage and for Great Moulton Plateau Farmland this is shown as Medium-High for a large scale BESS.

5.48 SPD Table 6 (page 57) assesses the Susceptibility of Landscape Character Areas to Substations. This table reveals that the substations planned for the East Pye scheme would all be located in Landscape Character Areas with a Medium-High susceptibility to this kind of development.

The table does not differentiate between large and small substations and it could be argued that the susceptibility of the Landscape Character Areas that would house the larger 400kv substations planned for Site 5 and for a location south of the BESS site should be evaluated as High in regard to these larger scale developments. Most certainly

LCA E2: Great Moulton Plateau should be evaluated as having a High susceptibility to a development as big as the National Grid substation planned for Great Moulton.

5.49 SPD Tables 3 and 6 provide further evidence to support a recommendation that the application be refused.

5.410 On pages 30 and 31 of the SPD document in Section 4 (4.5.8) there is a list of the potential landscape effects of solar PV developments.

Evaluating the East Pye scheme in the context of this list leads Hempnall Parish Council to the following conclusions. The East Pye development would:

- Result in large areas of land being covered by solar arrays (panels up to 4.5m in height) that would be particularly visible in open landscapes, or on slopes.
- Lead to the presence of PV panels and associated infrastructure in the landscape which would increase the perceived human influence on the landscape and change land cover patterns of rural landscapes. The scheme would change the land use and appearance of a field or fields, affecting land cover patterns.
- Include panels high enough to over-sail typical hedgerow field boundaries.
- Involve Screen planting that would block valued longer distance views across the wider landscape.
- Industrialise large areas of countryside with solar infrastructure which would appear out of place in particularly rural landscapes which are valued for their sense of remoteness.
- Involve the construction of ancillary buildings and security requirements (such as fencing and/or CCTV) which would introduce new and unfamiliar features into the landscape increasing the perceived human influence on the landscape, and eroding the intrinsically rural character.
- Lead to valuable arable land being taken out of production for many years.
- Intercept and disrupt the routes of existing public rights of way and negatively impact the experience of those using them.

Our conclusions provide many valid reasons for recommending that the application is refuse.

5.411 SPD Paragraph 4.5.10 draws attention to the importance of considering cumulative impacts due to "*the presence of several solar PV arrays in South Norfolk district, and the continued pressure for this type of development".* Hempnall Parish Council recognises how important it is assess cumulative effects in the context of a wider area within the South Norfolk District than the limited ES study area.

5.5 South Norfolk landscape character assessments (Land Use Consultants 2001 / Chris Blandford's Reviews 2012)

5.51 The SNC Landscape Character Area Assessments were originally produced in 2001 and were reviewed in 2012.

The SPD (South Norfolk Council Landscape susceptibility in relation to energy generation, storage and transmission), as already stated, concludes that all the landscape character areas in South Norfolk have either a High or Medium-High susceptibility to Solar PV developments over 50MW. It is therefore not necessary for us to look in detail at the characteristics of each of the landscape character areas because the professionals who produced SPD have already undertaken this work in arriving at their conclusions.

5.52 However we offer the following comments informed by our detailed knowledge of the local area:

A) Parts of Site 8 and all of sub-site 7b (south of Fairstead Lane, Hempnall) lie within LCA A1 Tas Rural River Valley. Furthermore site 7C is immediately adjacent to LCA A1 (north of Fairstead Lane, Hempnall) as are the northern sections of sub-sites 5A and 5B (south of the B1527) and the northern sections of sub-sites 4A and 4B (also to the south of the B1527). The southern boundary of sub-site 7A also runs directly alongside LCA A1 (north of Fairstead Lane)

The highly quality landscape evident in LCA A1, which, as stated in the South Norfolk Landscape Character Assessments Land Use Consultants 2001 Tas Rural River Valley document (Sensitivities and Vulnerabilities 5.10), is sensitive and vulnerable to incremental changes, including such minor alterations as the introduction of roadside kerbing which *"would be very detrimental*", is certainly not suitable as a location for NSIP solar infrastructure. If roadside kerbing is considered a threat to the character of LCA A1 how could it ever possibly be considered as appropriate for a mega size solar development?

Furthermore solar infrastructure located within LCA B1 Tas Tributary Farmland in those places where LCA B1 is directly adjacent to LCA A1 (as identified above – give para no) would produce more than small incremental changes to the peaceful rural character of LCA A1.

The 400kv substation planned for sub-site 5A would be visible from several places within LCA A1 along the river valley west of Hempnall.

B) According to the South Norfolk Landscape Character Assessments Land Use Consultants 2001 Tas Tributary Farmland document (Sensitivities and Vulnerabilities 8.13) LCA B1 Tas Tributary Farmland is particularly sensitive and vulnerable to incremental development and infill. Many of the East Pye sub-sites are located within LCA B1 and if built out they would certainly constitute large scale development (much more than just an incremental change) and lead to a great deal of infill of rural spaces with artificial structures that would industrialise a considerable area of countryside within this LCA.

C) The South Norfolk Landscape Character Assessments Land Use Consultants 2001 documents that cover the other Landscape Character Areas directly affected by the East

Pye scheme all list sensitivities and vulnerabilities that make those Landscape Character Areas unsuitable locations for an NSIP mega size solar project.

5.6 South Norfolk Council's Conservation Area Maps and Appraisal Documents

Appraisal documents and maps for all the conservation areas close to East Pye solar sites are available to view on the South Norfolk Council website. The appraisals include character assessments which describe in some detail the features present in each conservation area.

These documents and maps were very useful in assisting our consideration of impacts on conservation areas. Hempnall Parish Council consider that the scheme would cause significant adverse impacts (both direct and indirect) on the appearance and setting of conservation areas.

5.7 Overall Conclusion

The Rule 6 letter dated July 15, 2026 clearly sets out (in Annex B) the Government guidance and policy with regard to an NSIP application. The letter also explains that: *"The designated National Policy Statements (NPS) for Energy Infrastructure, specifically the Overarching NPS for Energy (EN-1), Renewable Energy Infrastructure (EN-3) and Electricity Network Infrastructure (EN-5) all dated December 2025, and which came into force in January 2026, apply to this examination and to decision-making relating to this application."* **And *that*** *"The Examining Authority (ExA) will consider the proposed development in accordance with the above NPSs and any other applicable policy or considerations the ExA deem to be important and relevant. "*

The letter goes on to say that: *"The 2008 Planning Act makes it clear that, in making a decision, the relevant Secretary of State (SoS) "must decide the application in accordance with any relevant NPS" (s104(3)), subject to certain provisos. Essentially, the provisos are that the application must not breach legal or treaty obligations, and that any adverse impact of the proposed development would not outweigh its benefits."*

The letter also points out that: **"***The SoS is entitled to disregard any representations that relate to the merits of the designated National Policy Statement (NPS). In practice, this means that the ExA will not spend time examining representations that challenge policy set out in NPSs, or the validity of NPSs themselves. The focus will be on the merits or disadvantages of the proposed development, tested to the appropriate extent using the tests set out in relevant designated NPSs that are in force. Other important and relevant*

planning policies that the ExA may consider include policies in the relevant local authorities' development plans. However, if these conflict with policy in a NPS, then the NPS will take precedence."

Hempnall Parish Council considers that the adverse impacts of the East Pye development outweigh its alleged benefits and that the Planning Inspectorate should recommend that the Secretary of State refuses the Development Consent Order (DCO).

The adverse impacts that would result if the scheme was permitted identified by Hempnall Parish Council in its Landscape and Visual Case are:

- **Major, Significant, Direct and Adverse Landscape Effects** throughout the whole of the scheme area and surrounding countryside during the construction and operation phases of the scheme. These impacts would be so substantial and transformative that they would alter the overall landscape character of the area. An attractive, rural, agricultural landscape would become a landscape in which artificial structures (solar infrastructure) become a key feature industrialising a large area of countryside stretching for over 15km from Tivetshall (to the SW) to Seething (to the NE). These Landscape Effects (whether seen or not) would be present throughout the whole of the operation phase.

The ES consistently underestimates landscape effects

- **Major to Substantial, Significant, Direct and Adverse Visual Effects** throughout the whole of the scheme area and surrounding countryside at Year 1 and Year 15 and throughout the operation phases of the scheme. These would transform vistas and the views experienced by users of PROW, residents and visitors.

The ES consistently underestimates Visual Effects

At all of the sites (except Site 6) at Year 1 current open views over attractive, rural countryside would be replaced by views of an industrial landscape where solar infrastructure (solar panels, security fences and cameras, inverter buildings, access tracks, substations, a BESS and a National Grid Sub Station) would be seen as a dominant element.

At Year 15, where mitigation planting proves successful current attractive views will be blocked and lost and where mitigation planting has failed views of industrial infrastructure will remain as at Year 1.

- **Major, Significant, Adverse inter-project and intra-project landscape and visual cumulative effects**

The ES attempts to minimise the significance of cumulative effects. We consider that it has restricted its assessments to a study area that is far too small and a very short list of developments and in so doing has ignored cumulative impacts over the wider area and many developments that should have been evaluated. It consistently underestimates cumulative impacts including cumulative landscape effects and cumulative visual effects which its ZTV plans confirm are substantial.

The sheer scale and dispersed nature of the East Pye scheme would itself increase cumulative impacts both within the scheme and over the wider area in combination with other developments. A scheme that stretches for over 15km from Tivetshall (to the south west) to Seething (to the north east) and includes 9 large sites proposed for solar infrastructure, spread over a wide area, would directly impact 30 villages, hamlets and communities (including the town of Long Stratton).We are not aware of any other NSIP solar application where the number of communities impacted would be so large.

Hempnall Parish Council considers the dispersed nature of the scheme and the fact that it would be spread over a large area of countryside, affecting so many communities, is a key reason why this application should be recommended for refusal.

- **Major, Significant, Adverse In Combination Effects**

- **Major, Significant Adverse impacts on rural tranquil landscapes**

- **Significant adverse impacts on light pollution** affecting the night sky and rural dark landscapes

- **Significant adverse impacts (both direct and indirect)** on the appearance and setting of conservation areas

- **Major and significant adverse impacts on the appearance and character of local roads** – including as a result of tree and hedgerow removal

- **Major, adverse impacts on the landscape and views resulting from the building of haul routes** (new roads) for site construction, maintenance and de-commissioning

- **Major Adverse impacts on Public Rights of Way**

Covered in great detail under Visual Effects and in our appendices (narrative walks)

Hempnall Parish Council has provided details of the policies (national and local) and guidance documents that support its objections to this application. We consider the landscape and visual impacts of the scheme (identified above) to be so severe

that they provide sufficient reasons for a recommendation to refuse the application and most certainly when added to the objections provided on other topic areas by Block East Pye Solar (BEPS) and others the case for a refusal recommendation is overwhelming.

Hempnall Parish Council fully endorses and supports the conclusions presented by BEPS in its written representation including those relating to topic areas not covered, or just partially covered, in our written representation including: Transport and Access; Cultural Heritage; Ecology Nature and Bio-diversity; Noise and Vibration; Aviation and the Water Environment.

In the overall planning balance the adverse impacts that the East Pye development would produce clearly outweigh the alleged benefits and Hempnall Parish Council requests that the Planning Inspectorate makes a recommendation to the Secretary of State for Energy Security and Net Zero that the application is refused.

Footnotes

- Hempnall Parish Council does not question the need to pursue the objective of achieving Net Zero by 2050 and is not challenging policy set out in NPSs, or the validity of NPSs themselves.
- However we do believe there is a better way of providing the solar contribution that is needed to reach Net Zero by 2050 than covering large areas of countryside with solar infrastructure. Research, commissioned by the Campaign to Protect Rural England (CPRE) and carried out by the UCL Energy Institute, demonstrated that up to 117GW of solar energy could be generated from existing rooftops, car parks and other artificial surfaces in England by 2050. In 2020 the Climate Change Committee considered that to reach net zero, the UK should target 85GW of solar by 2050 and while that requirement will have increased in recent years it is still less than the 117GW that England alone could potentially generate. If permitted the East Pye scheme would not be connected to the grid before 2030 and the scheme would therefore not contribute to the attainment of the 2030 Clean Power target.
- Hempnall Parish Council cares passionately about protecting and conserving the countryside which is a precious national asset enjoyed and appreciated by residents and visitors alike and does not believe it is right to pursue one green objective, the attainment of Net Zero, at the expense of another, the protection of our countryside.
- Hempnall Parish Council consider that each of the 9 solar sites should have been treated as separate applications (as would be the case for housing estate developments) because of their spatial separation over a wide area and because their only inter connectivity is provided by cable route corridors.

Opposition to the application
Hempnall Parish Council knows that it has widespread public support for its opposition to the East Pye application because it has held two parish meetings (on 08/11/24 and 17/04/26) in regard to the development, in addition to its regular monthly meetings, and at both meetings there was an exceptionally large attendance. Over 300 people were present at the November 2024 meeting and on a show of hands only one person voted in support of the application, ten people abstained and everyone else voted to oppose the development. 209 people were present at the April 2026 meeting and everyone voted to oppose the application.

The Clerk has forwarded the minutes of these two meetings to the Planning Inspectorate in response to Mr Cliff's request made at the hearings held at Dunston Hall (September 15 to September 17 inc.)

Opposition to the application is almost universal throughout the scheme area, the wider area and elsewhere in Norfolk and the UK. Norfolk County Council, South Norfolk Council and nearly all the parish councils directly affected oppose the development. It is opposed by CPRE Norfolk, BEPS and a large numbers of residents – there were 2033 relevant representations submitted to PINS and almost all of them expressed opposition to the scheme. This is unsurprising because the sites are dispersed over a very wide area and the development would directly impact 30 villages and hamlets. The harm it would cause would affect a large area within South Norfolk.

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Appendices

1) HPC – APP 01 - Figure 01 Narrative Walks
2) HPC – APP 02 – Map showing viewpoints on Narrative Walk 7ii (Saxlingham Green)
3) HPC – APP 03 – Assessment of Visual Effects Saxlingham Green Walk (Narrative Walk 7ii)
4) HPC – APP 04 – Hempnall Parish Council Map A – scheme area
5) HPC – APP 05 - Hempnall Parish Council Map B – Cumulative Impacts
6) HPC – APP 06 – Hempnall Parish Council Map C- paths, bridleways and tracks very directly affected by the application
7) HPC – APP 07 – Figure 02 Hempnall Parish Council's CPRE Tranquillity Map
8) HPC – APP 08 – 2b Landscape Consultancy's Review of LVIA Significance of Effects
9) HPC - APP 09 - Summary of Residual Landscape and Visual Residual Effects (extract of ES Vol1 Ch 20)
10) HPC – APP 10 – Photos showing the vegetation on Island Green's Trowse solar farm after 10 years of operation
11) HPC – APP 11 – Summary of the Hempnall Parish Council Written Representation