

I wish to object to this scheme on eight grounds as follows:

1. Solar Power is inherently inefficient in the UK. Nationally available data shows that electricity consumption is higher in the winter than in the summer and that solar produces more electricity in the summer than in the winter. Therefore creating solar generation capacity also requires alternative generating capacity which will be used more in the winter than the summer. This leads to duplication of investment in generating capacity and thus higher costs.

Data from NESO Monthly Energy Stats– the National Energy System Operator – for the period June 2025 to May 2026 shows that consumption was 29 TWh in January 2026 but only 21 TWh in June and August 2025. Using these figures it gives a 38% higher requirement in peak winter months than lowest summer months.

These figures are broadly similar to those of the previous 12 months when the lowest monthly usage was 20TWh in July 2024 and the highest 28TWh in January 2025 with the highest month being 33% higher than the lowest.

The same data source shows that Solar generated 11.9% of required electricity in June 2025, 12.4% in May 2026 but only 1.5% in December 2025. This shows that Solar in summer produces some 8 times the output relative to consumption compared to winter.

. The Solar Roadmap produced by the Department for Energy Security and Net Zero envisages an increase in installed solar capacity from 18GW* to 47GW by 2030; NESO states that Solar production was 11.9% of demand in June 2025 so with no change in consumption this calculates at 31% of total summer month electricity generated by June 2030 – and around 3.5% in a winter month.

Thus if Solar generating capacity is structured to produce this 3.5% of the county's requirements in a winter month it will produce about 30% of the lower requirement in a peak summer month. Alternative generating capacity will be required for 96.5% of winter demand. This alternative capacity would be more than capable of meeting the lower summer demand but if that is sourced from solar, it will be largely idle in the summer months. Substantial generating capacity would be unused. More investment cost, more expense = waste of public and private money. Nowhere in the Solar Roadmap is there any mention of the fluctuating production and consumption across the seasons of the year. This is a major shortcoming and suggests it has not even been considered – but as demonstrated above it is critical.

• The 18GW is described as being “at present”; the Solar Roadmap is dated June 2025

2. Solar farms are planned for prime agricultural land. The East Pye scheme is planned to involve over 5,700 acres (2,232 ha) of South Norfolk farmland. This cannot be a sensible choice at a time when the UK imports over 40% of its food needs. DEFRA reports “The UK currently produces about 60% of its domestic food consumption by economic value, part of which is exported. This means just under half of the actual food on plates is produced in the UK”. Source DEFRA UK food security report 2021

The government cannot put electricity security – food for machines – ahead of food security. If solar panels are to be a part of our generation capacity they must be somewhere else – such as the roofs of public and industrial buildings or brownfield sites. These are currently unproductive areas; using farmland only moves a problem from electricity security to food security.

3. Concentration in one area. The Solar Roadmap envisages less than 0.4% of total UK land would be needed for solar projects. This scheme alone represents 0.43% of total Norfolk land. Other schemes are already in operation and under consideration in Norfolk. This degree of concentration in one small area is out of all proportion and is far in excess of what the Solar Roadmap sets out.

. (note: Norfolk is 2077 sq miles = 1,330,000 acres. This project involves 5700 acres)

4. Inappropriate in a rural environment. This industrial scale construction with security fencing – for substations and batteries (BESS) – is not appropriate in a rural environment. The countryside contains small villages, narrow winding roads and is predominately agricultural with green fields and hedgerows; wildlife flourishes – a government objective. To construct this solar infrastructure here runs counter to government wildlife policy. There is a choice over whether to do long term damage to this environment – and the logical choice is to avoid damage.

5. Disruption to the local community. This is a big project, machinery and equipment has to be moved on small country roads which were not designed for the lorries required. The roads and verges will be damaged and clogged up. The Wildlife verge areas set up by the County Council will be wrecked by the heavy traffic. The project would set one government policy (energy sustainability) against another (wildlife and rural communities) causing yet more waste of public money at a time when government finances are already under strain.

6. Fire and pollution risks. The scheme includes battery storage as well as solar panels. The risk of spontaneous combustion in the batteries is well documented – for example the fire at Luton airport (October 2024), the fire on the cargo ship Morning Midas which sank off the coast of Alaska on 23rd June 2025, three weeks after a fire which could not be controlled causing the ship to be abandoned and the fire at a small (10MW) Gloucestershire BESS site in March 2025 which took 3 days to control. The East Pye site is remote, fire appliances have a long way to come and the nearest, Long Stratton, has only a volunteer crew. The damage to air and water quality from a fire would be devastating to the local community and wildlife.

7. Financial engineering. I understand that the ultimate owners of the scheme include Australian interests. Thus the project will be structured so that the UK company is loaded with borrowings and management charges by the promoters – all of which will be offset against profits for UK tax purposes and the surplus will end up in offshore tax havens. There needs to be a mechanism to retain the taxable profits in UK so as to benefit the whole of the UK from the tax generated. We need only look at Thames Water to see how overseas companies manipulate the system to move profits overseas and leave behind an indebted and struggling utility which tax payers will eventually have to rescue. If we are to undertake large scale infrastructure projects we need to ensure the whole UK economy benefits and not overseas tax havens.

8. Remediation costs. There does not appear to be any provision for eventual remediation. The UK operating company is effectively a Shell, owned and controlled by overseas interests. There needs to be certainty over how remediation will be funded once all the funds have been transferred to the overseas tax havens favoured by the ultimate owners. A substantial Escrow account is required to ensure that its not UK taxpayers who are left to fund these costs but I cannot see any mentioned.

References

Solar Roadmap – DENZ UK Solar Roadmap 2025

