

As a local I'd like to thank the Planning Inspectorate for the opportunity to speak.

Site Selection and Scope of the Proposed Development

In East Pye Solar Environmental Statement Volume 1 Chapter 5 Reasonable Alternatives and Design Evolution¹, I wish to correct some errors and ask three questions.

Norwich Main Substation

'Environmental Statement Chapter 5 – Reasonable Alternatives and Design Evolution' 5.5.3. states:-

'The Applicant initially considered a Point of Connection at the existing Norwich Main Substation; and commenced their search for solar sites in parallel. It was established that there were landowners willing to lease their land for solar development in the area.

'However, subsequently, National Grid Electricity Transmission advised that there was neither sufficient *existing* capacity at the Norwich Main Substation nor an opportunity to expand this existing substation to accommodate a 500MW solar project. Given this, the Norwich Main Substation was discounted as a viable PoC.'

This statement does not state whether or not the advice given *included* the new National Grid Norwich to Tilbury scheme with its new Norwich Main Substation due for completion 2031, pending an NSIP planning decision this November 2026.²

The applicant must clarify this. It bears upon whether East Pye Solar's initial plans were in fact viable in terms of the National Grid to *come* (and before they place a spade in the ground) not what exists *now*.

Were the new Norwich Main Substation provide capacity to accommodate the applicant's original intentions, will the Examination Authority request they revisit before all else? (If it works, everyone including the applicant should be happy: it was their preferred option...)

Finally will the Examining Authority raise this issue with all parties well in hand of the October 6th deadline, since it clearly may have a bearing on their representations?

Wind & BESS

5.1.5 page 5

‘The BESS allows for energy to be released ‘on demand’ at time of greater need, in a way that cannot be provided by wind turbines at this time.’

Not true. Scottish Power has been doing just this since 2022; i.e. wind and BESS working in tandem.³

Wind Turbines – their looks

5.1.4 page 5

‘Onshore wind is not considered to be a suitable alternative because the flat topography of the Order Limits would likely give rise to greater adverse visual effects due to the height of the wind turbines, and the proximity to residential dwellings may give rise to adverse effects associated with shadow flicker and turbine noise.’

The applicant provides no evidence to verify, still less substantiate, that flat topography would give rise to greater adverse visual effects etc.

However a little beyond the applicant’s twelve parishes lies the Eye Wind Farm, operational since 2013, has a maximum tip height of 130 meters yet are just 750 metres and in sight from the Grade II listed Goswold Hall and a mile away clearly visible from Eye Castle.⁴

Integrated wind and solar do work well together as Mertens and others demonstrate⁵.

Question

As wind and batteries demonstrably do work together and wind turbines may not be unsightly, will the Examining Authority request the applicant reconsiders their previous dismissal of wind?

¹ <https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN0110014-000105-6.1.5%20Environmental%20Statement%20Volume%201%20Chapter%205%20Reasonable%20Alternatives%20and%20Design%20Evolution.pdf>

² [REDACTED]

³ ['Whitelee (BESS), co-located at Ardochrig with Whitelee Windfarm.'

[REDACTED]

[REDACTED]

<https://heritage.suffolk.gov.uk/Designation/DSF5812>

<https://heritage.suffolk.gov.uk/Monument/MSF3995>]

[REDACTED]

As a local living in Pulham Market I'd like to thank the Inspectorate for a clear summary letter and annexes.

Safety

'Battery energy storage system (BESS) safety provisions and implications' lies currently under 'Community, health and well being.' It is better placed under a separate section 'Safety.'

These implications are universal, from the EDF BESS station just opposite us in Dunston Hall to Australia. 'Community, health and well-being' refers just to the South Norfolk Claylands.

There is also the danger neither set of issues will be addressed adequately, or that one dominates the other. Furthermore, the experts involved in safety are totally separate from the issues within the community, health and well-being section.

To summarise: in the Inspectorate's eyes safety must be serious enough to warrant inclusion. It is a separate matter so merits and requires a separate section

Site selection, alternatives and design

Presumably alternatives will go beyond the applicant's sixteen parishes. There are 540 in Norfolk and 479 in Suffolk, which means the applicant has only considered under 2% of the area's potential. This is an insignificant figure for a Nationally Significant Infrastructure Project, especially when two similar schemes, TASWAY Energy abuts East Pye Solar while EcoPower Suffolk is twenty minutes drive down the road.

Landscape – beyond the visual

Though it's good to see landscape appear as a concept, it isn't simply just visual. Human settings, ecological factors and underlying structures also occur within and therefore predicate a landscape, so these three subject zones should each be viewed as landscape-based. This accords with Natural and Historic England's deployment of landscape characterisation as a tool of analysis, being particularly suited for large-scale studies and applications. To assist understanding and synthesis, the trio of cultural heritage, ecology and visual may be placed under a landscape umbrella.

Consultation

Annex C is to cover how things are to be treated, not the things themselves. It should also cover how things were treated.

In February 2023 South Norfolk District Council brought to notice two of the sixteen parishes, Framingham Earl and Pulham Market, had hardly been consulted.

In March 2026 the applicant submitted a Statement of Compliance including Adequacy of Consultation Milestone Documents.

In between these dates Regener8 distributed leaflets with meeting invites to all the letter-boxes in Pulham Market. It was for a solar scheme:-

- outside the parish
- thirty-three times smaller than East Pye Solar

During these three years to the best of our knowledge East Pye Solar provided virtually nothing – no letter box leaflets, notices, open meetings, nothing. In short consultation in Pulham Market wasn't simply inadequate, there wasn't any.

This is wrong. In a country governed by democracy and enshrined in the 1947 Town and Country Planning Act it is the applicant's obligation and the Planning Inspectorate's duty to ensure all relevant parties are informed and have their say.

The whys and wherefores during this three year gap is now history. We're at the stage of the draft examination timetable. What needs to happen now is to engage with Pulham Market. If it causes delay so be it. East Pye Solar ought to have done things properly.

Thank you

David Fine Spoken Representation 15/09/2026,
updated 21/09/26 to include BESS incident Summerside, Nova Scotia

John McEvoy asked me to send in my questions before October 6th. They're below in *italics*..... and an update on the current Summerside BESS incident underlined

'I have four questions to ask the Planning Inspectorate and the first is about *consultation*...

'Although under the footprint of East Pye Solar – a cable route corridor runs through the parish - we only found out about it this May when Kay picked it up on local facebook. It left her in tears, and me fuming. I still am.

'I did some digging in the Planning Inspectorate's library, in particular consultation. In February 2023 South Norfolk District Council brought to their notice that Pulham Market had hardly been considered by East Pye Solar. That's still true today three and a half years later. *'The question's dead simple. How is the Examining Authority going to rectify this situation?*

'The next question is *safety*. The key safety area is lithium-ion batteries. At the moment this is placed under 'Community, health and well-being' However lithium-ion safety is universal, be it an Island Green Power proposal in Australia, or EDF Norwich across the road. [See UPDATE page 3 on Summerside Prince Edward Isle, Nova Scotia BESS fire. It also bears reference to scope] Clearly these are two distinct areas, with separate expertise etc. They are best treated as such to ensure full and proper attention to each. *Will the Examining Authority examine safety separately?*

'Third question is *scope*. There are two other schemes nearby going through the planning mill. TASWAY Energy Park abuts East Pye Solar while EcoPowerSuffolk is just down the road. *As schemes which are next-door-neighbours impacting the entire area will the Examining Authority include them all in their thinking, if they have not already done so?*

'Fourth archaeology. Sad to say I'm a professional archaeologist. Made it clear to the Inspectorate East Pye Solar is bang-centre of a classic and unique medieval landscape. The applicant's consultants fail to pick up on this. For example the threat isn't just cable-route corridors, it's the medieval access roads to get to them. This isn't the place to go into detail. *Will the Inspectorate refer this part of the application to impartial specialists?* I'm not one of them, but can point you in the right direction.

To help find who to point to, please see overleaf:-

David Fine IPR no: [REDACTED] 15th September 2026 Open Session

Landscape History and Archaeology for South Norfolk Claylands

Specialists

The go-to person is [REDACTED] He is the doyen of doyens.

[REDACTED]

Sadly when we first met four years ago [REDACTED] had already come down with [REDACTED], and so I've not contacted him directly but e-mailed a colleague where we share an interest in WWII United States Army Air Force landscapes.

To give you some background [REDACTED] and colleagues' work provides both substance and methodology to understand how the landscapes across the East Pye Solar ambit works in both human and also ecological terms. For example he is brilliant working from underlying soil structures and hydrology through the ecology and archaeology up to historic building and documentary evidence. In particular his holistic approach and method as a historical geographer is map orientated, and ideal both as a methodology and source material since he has worked for decades along and around the 'Pye Road' corridor (aka A140 roman routeway) [REDACTED] is well-known and admired throughout the field from academics to local societies.

Consequently it is an utter surprise and disappointment that East Pye Solar's consultants GHC Archaeology & Heritage [REDACTED] make absolutely no reference to [REDACTED] or his work whatsoever, and it shows in their reports. This gaping lacunae calls into question their worth.

Sorry to be so critical.

[archaeologists inform planners at several levels: University of Sheffield Dept Geography purchased twenty copies of 'A History and Guide to Sheffield' David Fine 1992 for their own library as a textbook for Town and Country Planning students. I didn't know they had till one of their students told me.]

UPDATE 21/09/2026:

Summerside, Prince Edward Island, Canada September 6th to 16th 2026

‘Summerside solar farm fire contained to single battery cell as burn-out enters 7th day’



Emergency crews continue round-the-clock monitoring as a battery fire at the 30-hectare Sunbank solar farm burns out. (Tony Davis/CBC)

Safety concerns, just local or also universal?

My oral representation made the case that safety matters were universal whereas other issues in ‘Community, health and well-being’ are local. The fire-hose above isn’t.

Just exactly how universal schemes are, and their dangers, is demonstrated by the current and ongoing BESS blaze at Summerside, Prince Edward Island, Nova Scotia. Their fire services were damping down the ‘runaway’ fire (you cannot extinguish them, just suppress till they burn out) while I was speaking. They’re still at it.

A key safety aspect of this runaway fire is that it jumped from one BESS HGV sized container to another – something which East Pye Solar assures us can hardly happen and that their on-site water supplies will contain a ‘typical BESS fire.’ It hasn’t at Summerside, demonstrated by the unstaffed hose dowsing the flames till they burn themselves out, which has yet to occur. During the incident residents were evacuated, warned in Block Capitals not to eat any garden produce, and a long-term safety plan has been implemented which includes monitoring soil and air levels of toxins.

A fuller report regarding the implications of the Summerside incident will be included in ‘It Might Never Happen’ which will be with you before the end of the week.