

East Pye Solar NSIP (PINS Reference: EN0110014)

Date: 6.10.26

From: Anthony Newman

Address: [REDACTED]

Dear Sir/Madam,

I wish to preface my formal objection to the PEIR by explaining that I object fundamentally to the East Pye Solar NSIP because there are already adequate solar energy and BESS projects either built, under construction or in planning to meet DESNZ's CP2030 and CP2035 targets for East Anglia (OFGEM 'TM04+ Impact Assessment', April 2025; NESO 'Connections Reform Data Impact Assessment', December 2024). As such, the East Pye Solar project is not essential to fulfil national renewable energy objectives. Indeed, it would unnecessarily take up capacity on the transmission grid which will be required for other types of required generation, and result in curtailment costs. The extreme and wide-ranging harms posed by this scheme—to the landscape, community, wildlife, farmland, and nationally significant heritage—are not justified by any demonstrable critical need for it. This proposal represents an unjustifiable assault on rural Norfolk that fails to balance national policy with local environmental protection.

Legal Basis for Procedural Objection

According to Section 55(3) of the Planning Act 2008, an application must include documents and information in accordance with statutory requirements. Schedule 4 of the infrastructure Planning (EIA) Regulations 2017 requires a description of likely significant effects and adequate baseline data to inform statutory consultation under Section 47 of the Act.

Key Procedural Failings in the PEIR

%İ The PEIR does not justify any evidenced need for the scheme either in this location or in relation to CP2030 or 2035 regional targets or the latest NESO and Ofgem data which demonstrates a clear oversupply of both BESS projects and solar in the East of England region (NESO 'Connections Reform Data Impact Assessment', December 2024; OFGEM 'TM04+ Impact Assessment', April 2025). (PINS SO 2.2.2)

%İ The PEIR defers crucial environmental survey data (e.g. for great crested newts, skylarks, lapwings, turtle doves, and bats), preventing meaningful assessment of ecological impact and breaching Schedule 4(1) of the EIA Regulations.

%İ No detail is given of the capacity, technology or design of the BESS (contrary to PINS SO 2.1.2). No Outline Battery Safety Management Plan (OBSMP) is provided, despite the known fire and pollution risks of large-scale BESS installations. This contravenes CDM2015, EIA Regs Schedule 4(8) and NPS EN-1 §4.11 on major accident risk assessment.

%İ Project lifetime impacts on human health are not adequately described nor cross-referenced across chapters (PINS SO 3.11.1)

%İ The PEIR omits any mapping or risk appraisal of the high-pressure gas main, water mains, railway line, or Source Protection Zones, which is necessary for assessing infrastructure safety and water contamination risks. This undermines compliance with EN-1 §4.11 and EIA Regs Schedule 4(8).

%İ No cumulative impact assessment includes adjacent or overlapping solar/BESS projects (e.g. Tasway Energy Park, High Grove, The Drovers), contrary to NPS EN-1 §4.2.5, EIA Regs Schedule 4(5) and PINS Scoping Opinion requirement 3.21.2; 3.21.3

%İ There is no complete Land Management Plan or Soil Management Plan, and no detailed operational land use strategy. This impedes assessment of long-term impacts on Best and Most Versatile (BMV) agricultural land. There is no decommissioning plan to restore the soil quality (PINS SO 3.20.3 and 2.1.9)

%İ Water-Framework Directive (WFD) screening is needed for ditch & River crossings. The PEIR contains no WFD screening or assessment contrary to PINS SO 3.2.4. An assessment of Private Water Supplies and impacts on them is incomplete and inadequate for statutory consultation (PINS SO3.2.5)

%İ EMF effects on fish & bats (400 kV export cable at Hempnall Beck) is missing

%İ The PEIR does not provide specific design parameters for the Horizontal Directional Drilling (HDD) works proposed for cable installation, nor does it adequately assess whether HDD alignment is likely to encounter groundwater bodies or aquifers (PINS SO 2.1.5)

%İ Materials, waste and arisings have not been described (PINS SO 3.9.1)

%İ Full Flood-Risk Assessment incl. 0.1 % AEP test + sequential/exception tests and FRA outputs provided; contrary to PINS SO 3.2.3 and EA comment FR1

%İ ALC for cable-route corridor is missing. Only on-site Grade 3 land is assessed; route omitted (PINS SO 3.20.3)

%İ Night-time lighting & dark-skies assessment. Lighting impacts are missing (PINS SO 3.14.6).

%İ Construction-phase glint/glare & equestrian safety not assessed (PINS SO 3.14.6). Acceptability of Glint and Glare has not been agreed by Aviation stakeholders.

%İ Decommissioning noise & vibration (heritage) is omitted (PINS SO 3.18.1)

%İ Invasive-species plan & biosecurity is missing (PINS SO 3.15.14)

%İ BNG metric is missing completely. Watercourse biodiversity-net-gain metric is

missing. Environment Agency wants BNG for River Tas – comment FBG9

%İ Public Rights of Way severance metrics & amp; bridleway safety. Impacts on I
& amp; equestrian glare)

%İ Further UXO survey commitment for RAF Hardwick/Tibenham sites was requested
however, no commitment to intrusive UXO surveys despite 'moderate-high' risk
flagged in PINS SO 3.3.2 (RAF Hardwick consists of both sites 3a and 3b – Heavy
Bomb dump was on 3b).

%İ There is no evidence of effective public engagement under Section 47 of the
the PEIR lacks the detail needed for informed community consultation—particularly
regarding visual impacts, transport disruption, BESS risk, and water use.

Complaint about Community Engagement

We would also like to bring to your attention that many residents across multiple parishes, including elderly and vulnerable
parishioners, have been receiving letters from East Pye

Solar's land agent, Dalcour Maclaren, informing them that their property 'may be required' for this project.

The letters provide no indication of exactly why their property may be needed or whether this is on a temporary or
permanent basis. This is causing enormous distress and anxiety to residents and has been reported extensively in
national and local press ('Domesday villagers face being forced to sell homes to make way for UK's biggest solar
farm', Daily Express, Mon, Jun 9, 2025; 'Britain's biggest solar farm threatens Domesday villages', Telegraph Mon, Jun 9,
2025). Despite this, neither East Pye Solar nor Dalcour Maclaren have provided any reassurance to individual residents.
The residents have been contacted multiple times by post and by telephone. The situation has become so distressing that
Hempnall Parish Council has passed a motion to report the issue to the Police as causing Harassment, Anxiety and
Distress.

This project should have been planned from the start to avoid these kinds of impacts on private residents and their
properties. This is an entirely inappropriate and disrespectful way to treat the local community and their private homes.

RE: Personal Impact Statement and Procedural Objection – East Pye Solar NSIP

Submitted under Sections 42–48 and 55 of the Planning Act 2008, and the Infrastructure Planning (Environmental Impact
Assessment) Regulations 2017.

Dear Case Manager,

I am submitting this combined Personal Impact Statement and Procedural Objection regarding the East Pye Solar
Nationally Significant Infrastructure Project (NSIP). I am submitting this both as:

- an individual directly and severely impacted, and
- a supporter of the BEPS residents' campaign group, who have identified extensive procedural failings in the Applicant's
consultation and environmental assessment.

This representation requests that the Planning Inspectorate:

- (1) does NOT accept any DCO submission from East Pye Solar Ltd unless full statutory compliance is demonstrated, and
- (2) records my personal and property-specific impacts as a Category 3 individual under Section 57 of the Planning Act
2008.

A. PERSONAL IMPACT STATEMENT (INDIVIDUAL REPRESENTATION)

1. Heritage Impact – Harm to Grade II Listed Property and Conservation Area

I am the freehold owner of The Old Carriers Arms, Saxlingham Nethergate, a Grade II listed 17th-century property with
minimal foundations, directly fronting The Street within a designated Conservation Area.

The East Pye Solar proposals, including AIL routing and village-edge industrialisation, will:

- harm the listed building's protected setting,
- diminish the Conservation Area's historic character,
- risk structural damage due to heavy-load transport,
- destroy the rural landscape essential to heritage significance.

These impacts conflict with:

- Section 66 of the Listed Buildings and Conservation Areas Act 1990
- NPS EN-1 (Heritage)
- local heritage policies

and have not been assessed properly in the Applicant's documentation.

2. Structural Risk from Proposed AIL Route (183-tonne Loads)

The proposed AIL/HGV route passes directly in front of my home. My house sits at road edge with no modern foundations.
No vibration assessment, subsidence assessment, risk modelling, or structural mitigation has been undertaken, despite
clear obligations under:

- NPS EN-1 – Assessing Construction Traffic Impacts
- EIA Regulations 2017 – Requirement for up-to-date environmental information

Given the age of the property, the potential for structural failure is significant.

3. Severe Loss of Property Value and Unsaleability

Since the scheme emerged:

- my property has become unsaleable,
- flagged in searches since October 2025,
- estate agents confirm buyers will not proceed,
- my ability to downsize has been removed.

As I am 67 and my wife 64, our home is our financial security and pension substitute. This NSIP threatens our long-term
financial stability.

4. Loss of Rural Character, Amenity and Quality of Life

The proposal would:

- surround the southern village edge with industrial solar infrastructure,
- eliminate countryside views and footpaths,
- introduce large substations and haulage routes,
- significantly increase traffic, noise and disturbance.

These impacts have not been properly assessed or mitigated.

5. Mental Health & Well-being

The uncertainty and scale of the proposals have caused sustained stress, anxiety, and sleep disruption. The fear of losing our heritage home, financial security, and the rural environment we rely upon has taken a serious emotional toll.

6. Request for an Accompanied Site Inspection

Given the:

- exceptional vulnerability of my listed building,
- narrowness of The Street,
- lack of vibration/structural assessments,

I formally request that the Examining Authority conduct an Accompanied Site Inspection.

B. BEPS PROCEDURAL OBJECTION (SUBMITTED IN SUPPORT)

I support and adopt the following procedural objections made by BEPS, and ask that they be recorded as part of my submission.

1. Failure to Consult in Accordance with the Published SoCC

The Targeted Consultation (22 Oct–26 Nov 2025) includes new material changes (substation relocation, access routes, vegetation removal) without:

- a republished SoCC,
- Section 47(6) public notice,
- compliance with the Applicant's own consultation commitments.

This is non-compliant with:

- Sections 47(1) & 47(6) PA 2008
- Section 55(3)(e) – Adequacy of Consultation Test

2. Failure to Consult Newly Affected Consultees

Entire categories of statutory and non-statutory consultees have not been re-consulted despite new receptors and materially altered impacts, including:

- Civil Aviation Authority / GAAC
- Private water-supply stakeholders
- Parishes on new haulage routes
- Heritage bodies for newly affected areas

Contravening:

- Section 42(1)(d) PA 2008
- Regulation 12 EIA Regulations 2017

3. Invalid Environmental Baseline – EIA Non-Compliance

The consultation relies on out-of-date baseline data, ignoring:

- vegetation clearance,
- new infrastructure areas,
- altered substation location,
- revised haulage routes affecting multiple Conservation Areas,
- aviation interference at Tibenham Airfield,
- new receptors at Great Moulton.

No revised PEIR, traffic modelling, ZTV analysis, or cumulative assessment has been issued.

Contraventions include:

- Regulations 3, 12, 14 & 17 – EIA Regulations 2017
- PINS Advice Note 7 – Baseline Requirements
- Scoping Opinion 4.11.3 & 5.3.1

4. Failure to Re-Consult on Material Design Changes

Major changes since PEIR include:

- re-routed corridors,
- new/enlarged grid infrastructure,
- 26 vegetation-clearance sites,
- movement of the 400kV substation,
- cumulative impacts with Tasway Energy Park (6,500 acres combined).

Under PINS Advice Note 16, these are material changes requiring re-consultation.

The Applicant has not done so.

5. Deficiency in Publicity and Access to Information

Consultation documents were:

- unavailable or incomplete at opening,
- not provided in promised print locations,
- inaccessible to several newly affected parishes not included in the earlier consultation.

This breaches:

- Section 48 PA 2008 – Adequate Publicity
- General principles of fairness under the Act

6. Requested Action by PINS

We ask that PINS:

1. Decline to accept any DCO application until the Applicant republishes the SoCC and undertakes a lawful consultation.
2. Require updated environmental baseline data before EIA resubmission.
3. Treat adequacy-of-consultation statements as contested and seek independent legal verification.

thank you for acknowledging this submission.

Yours faithfully,

Anthony J Newman

Yours faithfully,

Anthony Newman & Jeanette Newman

[Redacted Signature]