

Subject: Written Representation Submission for
Deadline 1 – East Pye Solar (EN0110014)

Dear Examining Authority / Case Team,

Please find attached my full Written
Representation, including a mandatory Executive
Summary and detailed evidence appendices,
submitted ahead of the Deadline 1 closing
window for the East Pye Solar Development
Consent Order (DCO) application.

- Project Name: East Pye Solar
- Project Reference: EN0110014
- Submission Content: Full Written
Representation containing an integrated
Executive Summary, Methodological
Disclosure, primary evidence exhibits, and
specific cross-examination questions
regarding parameter contradictions, battery
storage queue status limitations, and

regional grid capacity over-subscription.

CHAPTER 1: EXECUTIVE SUMMARY

This summary provides a technical counterweight to the Applicant's environmental and infrastructure filings for the East Pye Solar project. The evidence establishes that the project's claim to National Necessity is contradicted by its own technical disclosures. The combination of daytime generation limits, network capacity constraints, and an uncontracted grid queue status indicates that the environmental and community damages outweigh the calculated public benefit, justifying a total refusal of the Development Consent

Order (DCO).

The layout spans several key areas of concern:

- Site One (Central Transmission & BESS Complex): The design transitions post-consultation from a 132 kV regional feed to a 400 kV extra-high-voltage export platform, upscaling component heights to a maximum of 15 metres and introducing four pylons up to 61 metres in height. A major structural contradiction exists because the Applicant explicitly stated that the entire scheme would contain a maximum of three 400 kV substations. However, the site plans map three distinct 400 kV substations within the concentrated Site One compound alone, and a fourth 400 kV substation is clearly marked on the map at Site 7 near Saxlingham Green, directly exceeding their stated maximum parameters. Document

BESS compound is restricted to a provisional Gate 1 status with no contracted connection date, rendering the southern 400 kV substation redundant. The targeted parcel sits under an active Countryside Stewardship agreement.

- Widespread Generation Fields & Underground Cable Corridors: The proposed footprint occupies Best and Most Versatile (BMV) clay columns. Due to its moisture-retentive nature, heavy transport operations during wet periods cause structural compaction. Document [7.12](#) confirms a Green Gate 2 status for the arrays, though localized network over-subscription presents a risk of long-term commercial curtailment.
- Archaeological & Historical Preservation: The proposed footprint intersects the historical site of All Saints' Church (NHER

Little Moulton, a medieval village settlement recorded in the 1086 Domesday Book. While the parcel currently functions as an open agricultural field, historical records indicate that this sector underwent formal ecclesiastical consecration prior to Domesday. The Applicant's environmental filings omit any legal or archival verification regarding whether this covenanted land has ever undergone a formal historical deconsecration. Because infrastructure developments cannot lawfully drive mechanical supports into consecrated ground containing un-demarcated historical interments without violating specific statutory and ecclesiastical protections, a significant regulatory omission exists. Evaluation trenching omitted the precise coordinates of crop marks near Saxlingham

surrounding Seething and Hardwick airfields. Standard magnetometry geophysical methods suffer false-negative limitations across dense, waterlogged clay geology. Executing deep mechanical pile-driving risks fracturing buried medieval structural remains and human burials. Furthermore, the layouts sit within high-risk WWII heavy bomber approach corridors, requiring deep-field magnetic scanning to mitigate buried unexploded ordnance (UXO) hazards.

- Proposed Community Leisure Amenity Allocations & Landscape Offsets: The proposed allocations consist of structurally constrained parcels. Asset Block A tracks directly over a restricted heritage preservation buffer containing Roman pottery kilns where engineering layouts are

banned, while Asset Block B is bounded on two sides by active industrial solar arrays. By removing arrays from Site 6 (Hempnall) to safeguard listed settings, the Applicant establishes a clear planning precedent that must be universally applied across all sections to protect residential settings from visual intrusion.

- National Infrastructure Saturation & Financial Liabilities: Siting 2,700 acres of panels ignores the geographic clustering of energy proposals flanking the over-subscribed Norwich to Bramford line. The application completely omits any assessment of alternative tech like perovskite solar windows, multi-use agrivoltaics, or Small Modular Reactors (SMRs). For decommissioning, the plans reveal an intent to abandon hundreds of industrial steel support piles 1 metre below

the surface and leave thousands of metres of sub-surface cabling inside their conduits, turning active farmland into a risk factor for unauthorized metal salvage. East Pye Solar Limited is a wholly owned subsidiary of Island Green Power, which is 100% owned by Macquarie Asset Management. This separation of local asset liabilities from foreign-backed investment funds creates a structural risk regarding long-term remediation funding, mirroring leveraged debt models historically seen in UK utility and infrastructure portfolios like Thames Water, the M6 Toll, southern water, Bristol airport, and Wightlink.

CHAPTER 2: METHODOLOGICAL DISCLOSURE & AUDIT FRAMEWORK

Given the volume of the application spanning over 400 folders, the author utilized AI strictly as a search and formatting tool to overcome reading and writing barriers caused by long-term health conditions. All core insights, geographical evaluations, and requested remedies stem entirely from the author's own independent research and firsthand library of evidence.

TECHNICAL SPECIFICATIONS (SECTIONS 1 TO 6)

SECTION 1: SITE ONE (THE CENTRAL TRANSMISSION & BESS COMPLEX)

Siting a 500 MW capacity transmission platform built exclusively to inject power straight into the national transmission spine completely bypasses local regional distribution networks.

The Applicant's consultation literature states the scheme has the potential to power approximately 115,000 homes annually. Framing a national bulk-export platform using generalized household metrics implies a direct community consumer benefit, which masked the project's true industrial macro-scale. Technical specifications confirm that upscaling to a 400 kV extra-high-voltage export platform at Site One ensures that 100% of the generated power will feed directly into the Norwich to Bramford overhead line corridor, providing zero local reinforcements.

A major contradiction exists between the submitted graphic plans, the public consultation promises, and the accompanying written text. The Applicant's framework explicitly stated that the development would be limited to a maximum parameters of three 132 kV substations and three 400 kV substations

across the entire project. However, the site plans demarcate three distinct 400 kV voltage class substations within the concentrated Site One compound alone, while a fourth 400 kV substation footprint is explicitly drawn on the master maps at Site 7 near Saxlingham Green. Component heights track up to a maximum parameter of 15 metres. Furthermore, specific hardware models remain uncommitted until post-consent procurement, meaning equipment options produce divergent acoustic signatures near residential boundaries. The Applicant's environmental noise statement relies on generalized acoustic models tailored exclusively to a neurotypical baseline, omitting any technical assessment for the neurodivergent baseline of the host community. For individuals with neurodivergent profiles or sensory processing differences, un-filterable low-frequency industrial noise represents an

unaddressed sensory health hazard capable of inducing severe psychological distress and sleep deprivation analogous to severe tinnitus. The 400 kV transmission interface requires the installation of three replacement pylons and one additional pylon measuring up to 61 metres in height. The submittals omit precise geographic coordinates for these structures and fail to provide legally binding construction sequencing guaranteeing the simultaneous decommissioning and removal of pre-existing pylons to prevent concurrent duplicate structural clutter on the Great Moulton plateau.

The physical layout places the massive 400 kV National Grid substation right alongside Narrowgate Way, directly flanking statutory Restricted Bridleways of ancient origin. The Applicant relies on an existing boundary hedge measured at approximately 4 metres high as the sole physical separation, completely failing to

screen the 15-metre tall substation components, lightning masts, and 61-metre pylons, directly affecting the dedicated memorial bench halfway along the path. Operational noise snaps here introduce an unaddressed safety hazard capable of spooking horses.

Downsland Park is an explicitly age-restricted over-55 community located approximately 1.3 km northwest of the site. Every property requires residents to clear exterior steps to exit. The park homes operate with a single-car width, nested double-loop traffic layout with separate entrance and exit gateways onto Woodrow Lane, and a communal car park. The park maintains zero professional on-site wardens, relying entirely on a voluntary residents' committee. The surrounding public highway network features narrow country lanes. The emergency response frameworks rely on a

baseline shelter-in-place indoors protocol during a toxic BESS thermal runaway event, which fails to protect residents whose static caravans lack atmospheric insulation. Furthermore, a mass evacuation will trigger an immediate inbound surge of family rescue vehicles, creating a counter-flow head-on deadlock at the entrance gateway. The narrow network requires fleeing residents to navigate a tight double 90-degree bend transition which features the sneath road junction intersecting directly on the turns, risking complete vehicular gridlock.

Sited at the corner marking the start of the Restricted Bridleway alignment, the Hundred Lane residential sector contains a caravan structure lacking atmospheric insulation and a separate traditional brick property. To escape an acute chemical fire or toxic plume originating at the Site One compound, all residents possess

only two escape vectors: they must either travel directly up the narrow lane toward the high-voltage infrastructure zone or execute an easterly evacuation across the Black Mill Lane level crossing. The Black Mill Lane level crossing is a user-operated manual checkpoint consisting of heavy metal field gates spanning an active regional rail corridor. Egress requires drivers to manually swing open two independent sets of metal gates before traversing the tracks.

Signage mandates that operators of large wheelbase transport assets must execute a manual telephone clearance call to network signaling operations prior to crossing.

Emergency vehicles face immediate deployment delays due to these legal phone requirements.

High-speed train transits generate substantial wake-vortex suction effects capable of drawing concentrated toxic BESS fumes rapidly along the rail corridor,

accelerating toxic gas dispersion into adjacent residential envelopes and introducing a toxicity hazard to passengers via active carriage HVAC intakes.

Although traditional brick-and-mortar construction, a significant number of the residences throughout the area have chimneys. In the event of a BESS thermal runaway incident generating expanding chemical air pollution plumes, any chimneys function as direct points of atmospheric ingress into the living spaces. Standard building regulations mandate that even where chimneys have been structurally capped or blocked off, they must maintain an active air vent within the flue to prevent condensation, ensuring that capped chimneys remain open conduits for external air intake and invalidating the applicant's generic shelter-in-place safety directives.

Document [7.12](#) confirms a structural split in the

project's connection queue gateways. The Daylight Solar PV arrays hold a Green Gate 2 connection delivery slot with confirmed network capacity. Conversely, the centralized BESS compound and associated southern collection substations at Site One are locked at a provisional Orange/Yellow Gate 1 prioritization status with no contracted connection date and zero capacity guarantees. The specific agricultural parcel of land targeted for this uncontracted BESS matrix and the second of the three proposed 400 kV substations is subject to an active, legally binding Countryside Stewardship agreement, officially recorded on the Defra MAGIC Map Service. Overriding a public covenanted plot dedicated to taxpayer-funded habitat restoration to construct a redundant, uncontracted industrial compound creates an unnecessary landscape overlay that directly violates local conservation baselines.

Siting intermittent PV generation arrays does not independently necessitate the construction footprint of this secondary southern 400 kV project substation.

- Question to the Applicant 1: "The Applicant's official public consultation literature states that the scheme has the 'potential to power approximately 115,000 homes annually.' Given that a 500 MW capacity station automatically meets the statutory thresholds for a Nationally Significant Infrastructure Project (NSIP) under the Planning Act 2008, can the Applicant explain why it chose to frame a national bulk-export transmission infrastructure platform using generalized household supply metrics during the initial public engagement phases?"
- Question to the Applicant 2: "Will the

examination record that following the parameter increase from a 132 kV class to a 400 kV extra-high-voltage class substation at Site 1B, 100% of the generated electricity will bypass the localized South Norfolk distribution networks to feed directly into the national transmission spine via the existing Norwich to Bramford overhead line corridor?"

- Question to the Applicant 3: "The Applicant's consultation literature explicitly stated that the development parameters would be structurally capped at a maximum of three 400 kV substations. Given that the submitted master layout maps clearly demarcate three 400 kV substations within the concentrated Site One compound alone, and a fourth 400 kV substation footprint drawn at Site 7 near Saxlingham Green, will

own maximum promised infrastructure caps on the plans, and clarify exactly how many individual 400 kV substations are to be constructed under this DCO?"

- Question to the Applicant 4: "Given that specific hardware models remain uncommitted until post-consent procurement, and that the submitted Environmental Statement evaluates acoustic impacts based solely on a neurotypical, average hearing baseline, will the Applicant clarify how their framework protects neurodivergent residents with acutely attuned sensory sensitivities from the profound psychological distress, sleep disruption, and severe psychiatric risks caused by un-filterable, inescapable low-frequency substation harmonic hums?"
- Question to the Applicant 5: "The Applicant's

documentation references the installation of three replacement pylons and one additional pylon up to 61 metres in height at Site One.

Will the Applicant provide the exact geographic coordinates for these structures on the open record, and confirm the legally binding construction sequence that guarantees the pre-existing pylons are decommissioned and removed simultaneously to prevent concurrent duplicate structural clutter on the Great Moulton plateau?"

- Question to the Applicant 6: "The massive 400 kV National Grid substation node is slated to sit right alongside Narrowgate Way, separated from the statutory Restricted Bridleway by an existing hedge buffer measuring approximately 4 metres high. Can the Applicant explain why they omitted advanced structural screening arrays, given

that a 4-metre hedge fails to screen 15-metre substation assets, lightning masts, and 61-metre pylons from equestrian paths where operational noise snaps introduce an unaddressed safety hazard capable of spooking horses?"

- Question to the Applicant 7: "Given that the developer's emergency response frameworks rely on a baseline 'shelter-in-place indoors' protocol during a toxic BESS thermal runaway event, will the Applicant clarify how this protocol physically protects the residents of Downsland Park, given that their static caravans lack atmospheric insulation and depend on exterior steps for exit while sitting within the variance path of an expanding chemical plume?"
- Question to the Applicant 8: "The 29 static caravans at Downsland Park depend on single-car width loops and operate with

separate entrance and exit gateways onto Woodrow Lane. Given that a mass evacuation will trigger an immediate inbound surge of family rescue vehicles from surrounding areas, and that fleeing vehicles may create a counter-flow head-on deadlock at the entrance gateway, how will the Applicant's emergency framework prevent a complete gridlock without any professional, trained personnel on-site to coordinate the traffic?"

- Question to the Applicant 9: "The public highway lane network surrounding the community requires fleeing residents and incoming rescue vehicles to navigate a tight double 90-degree bend transition which features the sneath road junction intersecting directly on the turns. Given that the applicant's emergency plans fail to specify coordinated transit routing for first

responders—allowing fire engines and ambulances to deploy either from the Norwich direction via Long Stratton or from the Pulham Lane roundabout end—how will the Applicant prevent an immediate head-on vehicular gridlock at this double 90-degree bend when vehicles converge from opposite single-lane corridors?"

- Question to the Applicant 10: "In the event of an exclusion zone enforcement at Site One, how will the Applicant coordinate the extraction of the residents within the Hundred Lane sector, given that their only available escape vector away from the fire zone requires navigating the manually operated double-gates of the Black Mill Lane level crossing? Furthermore, given that heavy first-responder assets like fire engines must legally execute manual telephone clearance calls before crossing to

getting stranded on the tracks, how will the Applicant mitigate these systemic deployment delays during an active industrial hazard event?"

- Question to the Applicant 11: "Given that high-speed multi-ton rail assets transit the line corridor close to the BESS compound, can the Applicant state if they calculated train-induced wake turbulence in their Environmental Statement air dispersion models, and clarify how their framework protects passengers and surrounding residential plots from the rapid wake-vortex tracking of toxic gases?"
- Question to the Applicant 12: "Given that the developer's emergency response frameworks rely on a baseline 'shelter-in-place indoors' protocol to manage toxic BESS emissions, will the Applicant clarify how this protocol protects residents and

workers throughout the area whose properties utilize chimneys, given that any open chimneys or mandatory building regulations air vents function as points of atmospheric ingress for chemical gas plumes?"

- Question to the Applicant 13: "Paragraph 2.12.13 of the Applicant's own Statement of Need [APP-068] confirms that the connection for the Battery Energy Storage System (BESS) component has only secured a Gate 1 prioritisation, meaning it has no contracted connection date from the grid operator. How can the Applicant justify the immediate compulsory acquisition of land and the construction of multiple 400 kV project substations at Site One before securing a firm network connection contract for the storage asset that necessitates them?"

- Question to the Applicant 14: "Given that the specific parcel of land targeted for the BESS complex and the second of the three proposed 400 kV substations sits under an active, state-funded Countryside Stewardship agreement—as verified on the government's official Defra MAGIC Map database—will the Applicant clarify how the destruction of this protected rural habitat aligns with the scheme's environmental mandates, and confirm if this secondary substation footprint will be entirely removed from the DCO layout if its Gate 1 placeholder status is ultimately refused by the network operator?"

SECTION 2: WIDESPREAD GENERATION FIELDS &

UNDERGROUND CABLE CORRIDORS

The 2,700-acre development footprint comprises Best and Most Versatile (BMV) clay terrain.

Operating heavy transport fleets, pile-drivers, and trenching machinery during wet periods causes structural compaction, reducing porosity and accelerating land degradation. Mitigating this hazard requires halting ground construction during wet cycles, introducing severe timeline volatility. Furthermore, regional grid over-subscription along the Norwich to Bramford corridor will force systematic operational curtailment of these intermittent daylight assets to prevent network overload.

- Question to the Applicant 15: "Given that the Applicant's Agricultural Land Classification (ALC) data confirms that the infrastructure footprint directly targets moisture-retentive gleyic clay soils with exceptionally narrow

operational windows, what specific meteorological thresholds have been embedded into the construction schedule to dictate exactly when heavy axle transport must be halted to prevent irreversible structural soil compaction?"

- Question to the Applicant 16: "Given the documented thermal capacity limits and baseline over-subscription of the regional 400 kV transmission network, will the Applicant clarify on the open record exactly how much of the 2,700 acres is actually required to meet the confirmed grid export capacity allocation, and provide the engineering justification for the compulsory acquisition of the remaining acreage?"

SECTION 3: RESIDENTIAL AMENITY, RECEPTOR VULNERABILITY, AND HEALTH IMPACTS

1. Statutory Health Protection Framework (Equality Act 2010)

Under the Equality Act 2010 and the Public Sector Equality Duty (PSED), the Examining Authority has a strict statutory obligation to evaluate the disproportionate health, psychological, and physical impacts of a Nationally Significant Infrastructure Project (NSIP) on vulnerable citizens. Receptors residing within close proximity to the proposed 400 kV substation footprint and Battery Energy Storage System (BESS) perimeter along the station road corridor manage complex, overlapping neurological and physical health

conditions. The imposition of an industrial manufacturing and transmission asset hundreds of yards from domestic boundaries introduces a documented risk of direct health-baseline acceleration.

2. The Clinical Cycle of Environmental Stress and Neurological Exacerbation

The Objector is diagnosed with Functional Neurological Disorder (FND) and a severe functional tremor. The primary clinical trigger for this neurological profile is environmental and situational stress. Siting a high-voltage, heavy-industrial complex next to the objector's domestic envelope introduces a verified, continuous environmental stressor that directly accelerates a debilitating neurological cycle:

- The Trigger Cycle: External situational anxiety and infrastructure stress directly

induce the functional tremor. The continuous physical toll of the functional tremor results in acute, systemic bodily exhaustion.

- **The Cyclical Feedback Loop:** This deep exhaustion acts as a secondary biological trigger, causing the functional tremor to intensify and loop continuously.
- **Physical Manifestation:** This cyclical feedback loop is highly debilitating, routinely forcing the objector into extended periods of absolute bed rest spanning multiple weeks and requiring the daily administration of high-tier prescription muscle-soothing medications typically indicated for multiple sclerosis (MS) to manage muscle spasms.

3. Environmental Impact on Cognitive

Communication Baselines

A documented symptom of the objector's clinical regression during periods of acute neurological escalation is a significant, transient impairment of speech and cognitive communication capacity. Environmental stressors directly accelerate this phonetic and expressive deficit, severely impacting the objector's ability to vocalize and self-advocate. Imposing a multi-year construction lifecycle and permanent heavy-industrial operational noise parameters onto this domestic receptor baseline introduces an environmental factor that threatens to lock in these profound communication barriers, fundamentally disrupting the resident's basic human right to unhindered domestic communication.

4. Critical Accessibility Constraints

and Local Authority Assistance

Context

The acute physical regression experienced by the objector has created immediate, profound mobility limitations and continuous daily exhaustion within the domestic environment. Essential daily living activities—specifically independent personal hygiene tasks including showering and accessing the bath, safe nutritional food preparation, and standard domestic ambulation—have transitioned from states of severe difficulty to total physical impossibility.

The household is currently engaged in active, critical dependency assessments with South Norfolk Council to secure essential disabled facility grants and structural home adaptation funding. Simultaneously, occupational therapy assessments are underway to deploy

specialized walking aids, perching stools, and stability assets to manage the chronic, daily energy depletion. The threat of an industrial pylon, substation, and battery development directly adjacent to the property introduces an environmental stressor that actively destabilises the objector's clinical baseline during this vital local authority intervention, threatening to permanently outpace the utility of any planned domestic accessibility adaptations.

5. Pre-Consent Damage Assessment and Post-DCO Risk Evaluation

The operational boundary lines of the application demonstrate an immediate threat to human health. The ongoing stress generated by the pre-consent planning process has already resulted in documented physical regression, requiring intensive medical management. The

evidence establishes that the mere potential of this development is actively inflicting direct physical damage on the objector's body.

Should the Development Consent Order (DCO) be granted, the transition from this potential threat to the actual, physical construction and operational phase—introducing heavy piling equipment, continuous HGV transport movements, and low-frequency harmonic humming—presents an unmitigated risk of permanent neurological degradation. The localized environmental stressors will collapse the objector's remaining physical mobility, rendering the domestic environment uninhabitable.

6. The Unregulated Supermarket Import Trap & Nutritional Substitution

The localized macroeconomic reality of this

project compounds these physical vulnerabilities. The joint household operates well below the government threshold for a satisfactory income, representing an extreme low-income status that is further impacted by precarious seasonal employment shifts at the Cantley sugar beet factory. High-quality local retail options, such as Goodies Food Hall, remain financially cost-prohibitive, forcing a standard domestic reliance on lower-quality supermarket imports.

To protect household health, the half-acre property and allotment are utilized for year-round nutritional food substitution. On days when physical capability allows the objector to leave bed, the garden provides direct, immediate access to fresh produce, bypassing the physical and financial barriers of a standard retail trip. Furthermore, the household maintains a potential interest in utilizing this land asset for

small-scale apiculture diversification. This potential venture is envisioned as a therapeutic activity for an elderly dependent relative's relocation and as a potential secondary source of income through honey sales to independent local businesses, such as Goodies Food Hall.

7. Cumulative Care Capacity Deficits

Any capability to execute this multi-generational care plan or pursue this potential land use depends on the objector's neurological health remaining stable. Should the objector's condition degrade further due to the localized environmental and acoustic stressors of the 400 kV infrastructure, the entire physical burden of care falls exclusively on the primary household carer. This individual is already fully extended, operating as a multi-generational carer for multiple dependent parents with advanced

cognitive and physical health conditions.

Siting a massive 400 kV substation and BESS installation hundreds of yards from this care hub introduces a threat of local pollinator collapse via Polarized Light Pollution (PLP) and Electromagnetic Field (EMF) disorientation. This directly undermines the agricultural viability of the land, removes the potential for future micro-business diversification, and threatens the stability of a vulnerable family care network. Under the Human Rights Act 1998, the omission of these care dependency, subsistence, and cyclical neurological health factors fails the statutory test of proportionality and public benefit.

SECTION 5: CULTURAL HERITAGE ARCHAEOLOGY AND LANDSCAPE INTEGRITY

1. Non-Designated Heritage Assets and Settlement Footprints (Little Moulton)

The proposed engineering layout places primary infrastructure foundations, including the 400 kV substation footprint and the Battery Energy Storage System (BESS) complex, in close proximity to the non-designated archaeological site of the lost medieval village of Little Moulton.

- Documented Toponymic Records: Norfolk Historic Environment Records (NHER) identify this sector as an area of high archaeological potential. Local field names,

including "The Sanctuary" and the adjacent "Frith Green" configuration, provide a recorded toponymic index of the historic settlement core.

- Cartographic Evidence: Historical Ordnance Survey maps (circa 1900) explicitly demarcate the targeted land parcel as "All Saints' Church (Site of)", confirming the presence of an un-demarcated medieval parochial core. Because the physical foundations of the church and its associated interments have been buried below the plow line since the late 16th century, the exact spatial boundaries of the consecrated footprint remain unmapped. Driving heavy mechanical pile-driven footings and cutting deep high-voltage cable runs through this unexcavated parcel presents an unaddressed regulatory risk of encountering unrecorded medieval

human burials.

2. Geophysical Evaluation Deficiencies and Crop Mark Anomalies (Saxlingham Green)

The pre-application archaeological evaluation across the wider development corridor exhibits systematic omissions regarding known sub-surface anomalies.

- Anomalies near Saxlingham Green: Multi-year satellite and aerial photographic baselines expose a distinct cluster of three sub-surface hexagonal crop marks, measuring between 30 metres and 42 metres across, characterising a sensitive heritage asset baseline such as a prehistoric or Romano-Celtic ritual site.
- Trial Trenching Methodology Limitations:

that the Applicant's physical trial trenching footprint left prominent sub-surface anomalies un-investigated. In the northern field near Saxlingham Green, the placement of the evaluation trenches omitted the precise coordinates of the crop marks. Because the trenching layout did not directly intersect the center of these documented features, the evaluation methodology remains incomplete. Relying on this data layer to conclude that the area is clear of significant heritage assets represents an inadequate assessment framework, as the highest-potential sub-surface assets were omitted from the physical sampling process. Utilizing standard magnetometry geophysical methods across dense clay geology frequently produces false-negative data layers due to mineral interference in

soil column. Relying on an incomplete evaluation footprint to conclude that the area is clear of significant heritage assets represents an inadequate assessment methodology.

3. World War II Aviation Architecture (Seething Airfield)

The inclusion of agricultural parcels immediately adjacent to Seething Airfield within the development footprint fails to protect significant modern aviation heritage assets.

- Runway Preservation: Aerial baseline imagery confirms that distinct crop mark variations indicating the structural alignments of the original wartime runways extend directly into the targeted panel fields. This topography holds documented

historical value as the operational asset base for the United States Army Air Forces (USAAF) 448th Bombardment Group (Station 146).

- Landscape Context Blight: Blanketing this immediate perimeter in high-density solar arrays permanently obliterates the structural context of the wartime airfield layout and presents an unaddressed risk of damaging sub-surface military archaeology.

4. Unexploded Ordnance (UXO) Risk Mitigation

The proposed construction corridor intersects an area containing a documented baseline for Unexploded Ordnance (UXO) hazards due to wartime infrastructure concentration.

- Target Infrastructure Bottlenecks: The South

Norfolk rail and road network—specifically the intersection of the Great Eastern Main Line, the historic Waveney Valley branch line corridors, and the adjacent industrial footprint of the Tivetshall Maltings complex along the B1134—served as a strategic target for regional wartime air raids.

Historical data confirms that returning damaged aircraft regularly jettisoned payload ordnance across the rural open fields spanning the wider local landscape.

- **Precautionary Clearance Requirements:** The developer's Commitments Register acknowledges this specific hazard constraint, citing documented historical records of a 500lb United States High Explosive bomb jettisoned on open land near Hardwick. Undertaking deep ground excavation, directional tunneling, and extensive pile-driving across these

unexcavated rural fields presents a significant safety risk. In accordance with CIRIA C681 construction industry guidelines, a detailed Stage 3 Intrusive UXO Risk Assessment and independent magnetic field clearance scanning must be a mandatory prerequisite for all infrastructure plots before any ground is broken.

- Question to the Applicant 17: "High-resolution satellite imagery captured during 2021 exposes prominent hexagonal crop marks near Saxlingham Green, while April 2026 imagery documents soil anomalies in the All Saints field, geometric crop marks extend directly into the footprint slated for the primary BESS compound and across the infrastructure corridors surrounding Seething Airfield. Given that these satellite records confirm that the Applicant's trial trenches entirely bypassed these specific

coordinated crop marks and others scattered across the footprint, failing to cover sufficient ground, will a secondary intrusive trenching phase be executed to properly investigate these anomalies before finalised heritage clearances are issued?"

- Question to the Applicant 18: Given that standard geophysical magnetometry techniques suffer documented operational false-negative limitations when deployed across dense clay geology, what scientific justification did the Applicant rely upon to reject multi-year satellite timeline disclosures as baseline indicators of sub-surface assets?
- Question to the Applicant 19: Given that historical records confirm the All Saints' Church footprint (NHER 10969) and the surrounding Little Moulton parish core underwent formal ecclesiastical

consecration, will the Applicant place on the open examination record the definitive legal and archival evidence confirming that this specific footprint has been formally deconsecrated? Furthermore, can the Applicant clarify its statutory mitigation strategy if un-demarcated historical interments or skeletal remains are encountered during mechanical piling operations?"

- Question to the Applicant 20: The proposed high-density infrastructure compound and underground cable route corridor sit within the historical emergency flight patterns of three active WWII heavy bomber bases (Tibenham, Hardwick, and Seething airfields). Given that Chapter 16 of the Environmental Statement (Ground Conditions) and the Commitments Register (Document [7.26](#)) explicitly acknowledge a

known Unexploded Ordnance (UXO) risk—including a documented 500lb US High Explosive bomb jettisoned near Hardwick village—why does the Applicant propose to delay detailed UXO desk studies and physical magnetometry scanning until the post-consent phase? In the interest of public safety and adherence to the precautionary principle, why should physical site-wide scanning and magnetic clearance not be made a mandatory prerequisite prior to the granting of any Development Consent Order (DCO), rather than a conditional requirement left to the post-consent phase?

SECTION 6: PROPOSED COMMUNITY LEISURE AMENITY ALLOCATIONS & LANDSCAPE OFFSETS

1. Public Amenity Allocations and Environmental Offset Constraints

Analysis of the spatial allocations confirms that the proposed public leisure provisions and environmental offsets represent structurally constrained parcels driven by underlying technical limitations rather than voluntary community concessions.

- Asset Block A (The stratton st Michael Field): Evaluation reports confirm this parcel contains archaeologically significant sub-surface remains, including verified Roman pottery kilns and multi-period settlement footprints tied directly to the adjacent

highway corridor (A140). Because engineering layouts are legally restricted across this quadrant due to statutory heritage protection laws, the Applicant is re-branding a non-developable heritage preservation buffer zone as a voluntary community asset. Furthermore, this field is situated at the far northern periphery of Long Stratton, positioning it entirely outside the main residential core and rendering it geographically isolated and highly difficult for the majority of the local host population to physically access. The site plans omit any designated vehicle or car parking infrastructure for this zone, creating a logistical constraint where visitors from the wider area face hazardous parking maneuvers on rural verges or directly along the A140 corridor.

- Asset Block B (The Triangular Field): This

parcel is geographically isolated from local population centers and is bounded on two sides by active industrial solar arrays, while its third side is bounded by an existing wooded area that physically precludes solar array deployment.

- Site 6 (Hempnall) and the Grade 2 Field Allocation: The design updates confirm the complete removal of ground-mounted solar panels from Site 6 and a Grade 2 Best and Most Versatile (BMV) agricultural field identified in the Applicant's mapping. Instead of being returned to full, unconstrained agricultural use, these highly productive plots are retained within the final DCO boundary markers. The Applicant's filings establish a mechanism where prime food-producing land is locked away under compulsory powers without a clear structural generation justification.

2. The Line-of-Sight Precedent Framework

By removing panel tracks from Site 6 and other specific sectors to safeguard the visual settings of nearby residential properties and historic listed buildings, the Applicant has formally conceded that ground-mounted arrays cause material disruption to residential environments. Standard planning consistency dictates that this exact same Line-of-Sight Protection Rule must be universally applied across the entire development framework.

Standard commercial hedges cannot physically screen or mitigate the extra-high-voltage substations, which feature 15-metre heights and industrial profiles that are exponentially more visually intrusive than flat solar array layouts. Equivalent structural setbacks, buffer

universally enforced to safeguard the site of All Saints' Church, Narrowgate Way, and any modern residential dwellings, domestic gardens, or private outdoor living spaces facing direct, unshieldable line-of-sight intrusion from these central substation hubs or array layouts.

- Question to the Applicant 21: Given that Asset Block A is situated at the far northern end of Long Stratton—rendering it physically isolated from the primary population core—and sits directly over a mandatory heritage preservation zone where engineering layouts are legally restricted due to verified Roman pottery kilns, will the Applicant clarify on the open record whether this represents a structurally constrained land parcel rather than an unconstrained community benefit?
- Question to the Applicant 22: Given the

the primary residential core of Long Stratton, will the Applicant confirm whether they intend to construct dedicated, safe car parking facilities for public use, and clarify how visitors can access these community allocations without creating vehicle parking blockages on rural verges or along the high-speed A140 corridor?

- Question to the Applicant 23: Given that the design updates confirm the complete removal of ground-mounted solar panels from Site 6 and a Grade 2 Best and Most Versatile (BMV) agricultural field identified in the Applicant's mapping, will the Applicant clarify the planning and operational justification for retaining these parcels within the compulsory acquisition DCO boundaries instead of returning them to unconstrained agricultural food

Question to the Applicant 24: By removing panel tracks from Site 6 to protect residential and listed settings, the Applicant has established a Line-of-Sight Protection Rule. Given that the 15-metre industrial substations at Site 1 and Site 7 are exponentially more visually intrusive than flat PV layouts and cannot be screened by standard hedging, will the Applicant confirm that this exact same Protection Rule will be universally applied to enforce equivalent structural setbacks or removals for any modern residential dwelling, domestic garden, or private outdoor living space facing direct line-of-sight intrusion from the central substations or fields?

REGIONAL ANALYSIS, CORPORATE AUDITS, & QUESTIONS (SECTIONS 7 TO 12)

SECTION 7: NATIONAL INFRASTRUCTURE SATURATION, GRID CONSTRAINTS, AND ALTERNATIVE TECHNOLOGIES

1. Regional Transmission Spine Over-Subscription and Public Cost Balancing

Siting a centralized 500 MW daylight solar asset to inject power into the Norwich Main to Bramford 400 kV overhead transmission line corridor contradicts regional capacity realities. Despite the completion of reconductoring and reinforcement works to optimize circuit

capacity, emerging East Coast offshore wind generation inputs have fully absorbed these infrastructure gains. National Grid capacity logs verify that this transmission corridor operates close to its technical thermal limits, triggering consistent constraint directives to regional wind assets during peak generation cycles.

Independent operational data indicates that offshore wind installations face contractual curtailment instructions during 10% to 15% of their annual operating hours due to these localized network bottlenecks. This over-subscription results in an estimated loss of [2.5](#) to [3.5](#) Terawatt-hours (TWh) of clean energy annually at this specific network node. Under existing regulatory frameworks, balancing these infrastructure bottlenecks incurs a national consumer cost of £500 million to £800 million annually in constraint payments, translating to an artificial system cost balancing charge of

approximately £20 to £30 per year on every domestic electricity user's bill.

Introducing an additional 500 MW intermittent daylight solar asset into this saturated corridor presents a clear risk of escalating these consumer-funded constraint penalties. Because national grid balancing costs are socialized across the entire British utility network, this financial burden directly inflates domestic household bills nationwide to subsidize non-generation windows, failing the statutory test of public benefit.

2. Project Delivery Timelines and Long-Term Asset Redundancy

The Applicant's filings confirm an estimated operational commencement date no earlier than 2031, with a high probability of extensive schedule volatility driven by the documented

meteorological vulnerabilities of the plateau's moisture-retentive clay geology. Under standard non-recourse project engineering contracts, construction delays trigger mandatory liquidated damages from the contractors directly to the Applicant, which introduces commercial variables that alter the delivery of established ecological mitigation measures.

Siting a new generation asset into a regional system that will be entirely saturated by the continuous [3.2](#) GW baseload of Sizewell C, extensive offshore wind inputs, and existing localized BESS/PV networks by its 2031 inception date ensures long-term operational redundancy. The infrastructure architecture forces domestic utility fees nationwide to subsidize an idle asset, directly damaging the public interest and conflicting with the national infrastructure balancing priorities of the Planning Act 2008.

3. Technology Option Assessments and Lifecycle Circularity

- Raw Material and Manufacturing Sustainability Analysis: The Applicant's technology selection is structurally deficient under the public options tests of the Planning Act 2008, as it relies on land-intensive crystalline silicon-glass arrays while completely omitting next-generation alternative technologies. Given the 2031 delivery window, the application locks the South Norfolk plateau into an obsolete infrastructure model before generation commences. Advanced alternative solar frameworks—specifically synthetic perovskite thin-film technologies—represent a superior, land-preserving circular alternative. Unlike traditional

panels that depend on intensive mineral mining and energy-heavy silicon purification, perovskite cell architectures are synthesized from highly abundant, easily accessible organic and inorganic compounds. Counter-analyses attempting to dismiss perovskite deployment based on trace lead content are fundamentally refuted by baseline domestic data and contemporary construction standards. A significant proportion of the historic residential stock across the United Kingdom built before 1970 contains legacy layers of lead-based paint, while properties constructed prior to the statutory 1999 ban on lead-based plumbing solder maintain active lead matrices directly within their domestic drinking water lines. Furthermore, physical lead sheets and flashing architectures continue to serve as the

contemporary roofing designs to channel water and safeguard roof valleys, managed continuously by building contractors without systemic exposure. Because trade networks are fully accustomed to working with raw, structured roofing lead, the presence of trace, fully encapsulated perovskite elements within durable roof tiles introduces zero operational safety concerns to the contemporary built environment. Conversely, the Applicant's traditional crystalline silicon panel selections present a significantly greater environmental contamination risk, deploying vast un-encapsulated volumes of heavy metal solder lines and circuit chemistries across a 2,700-acre agricultural field footprint.

- Recycling Infrastructure Constraints and E-Waste Realities: Standard crystalline frames

provide a static 25-year operational lifecycle before generating massive, un-recyclable electronic waste. Proper automated recycling infrastructure for crystalline solar cells is severely restricted across Europe—with the only large-scale industrial panel recycling plant operating in France. As a result, the global solar industry routinely exports degraded and obsolete silicon panels to developing nations that possess zero infrastructure to process or recycle them, creating a massive localized toxic electronic waste legacy. Perovskite stands in direct contrast, featuring a highly sustainable circular lifecycle capable of being cleanly recycled up to five times within localized manufacturing loops. This circular remanufacturing capacity extends the cumulative operational deployment lifecycle of a single panel asset up to 50

effectively doubling the lifecycle of conventional silicon layouts while bypassing the e-waste penalty.

- Omission of Infrastructure-Integrated Solar and Agrivoltaics: The Applicant's environmental filings completely omit any technical or geographic options assessment of alternative solar deployment frameworks, including:
 - Floating Photovoltaic (FPV) Arrays: Sited over existing inland water bodies, FPV arrays deliver a documented 15% efficiency boost via natural water cooling while suppressing evaporation to combat drought and blocking algal blooms to preserve water quality.
 - Built-Environment Integration: The application entirely fails to evaluate advanced regimes that integrate transparent perovskite solar windows

across commercial glass envelopes or curved perovskite roofing tiles straight onto urban building structures, transforming pre-existing urban footprints into active energy assets.

- Siting a land-intensive ground-mounted array while completely omitting these non-destructive, infrastructure-integrated alternatives violates standard options assessments under the Planning Act 2008.

4. Decommissioning Liabilities and Residual Infrastructure Abandonment

The Applicant's final decommissioning and remediation parameters confirm a structural failure to execute full site restoration, leaving behind an extensive e-waste and structural liability. The field filings confirm that the Applicant intends to completely abandon

hundreds of heavy steel array support piles directly within the deep soil column, merely slicing the structures off a single metre below the agricultural surface boundary.

Simultaneously, the framework dictates the complete abandonment of thousands of metres of sub-surface copper and aluminum cable networks directly inside their underground conduits rather than extracting and recycling the metal assets.

Leaving this highly valuable metallic payload unexcavated transforms active host farm holdings into high-priority targets for illicit metal scavengers and un-monitored excavation crews. This permanent e-waste abandonment exposes local farmers to dangerous, recurring land intrusions, severe structural property damage, and unlawful digging hazards as unauthorized operators attempt to trespass and forcibly rip the cabling arrays from the conduits,

leaving the empty conduits permanently buried.

5. Contractual Option Agreements and the Distortion of Community Consent

The socio-economic framework of the application reveals a structural restriction on basic stakeholder communication, utilizing private confidentiality clauses to alter a statutory, public planning process. The physical proof of these restrictions is a matter of public record, disclosed directly within the Applicant's own compulsory acquisition portfolios—specifically inside the *Statement of Reasons* and the associated *Land Status Logs / Compulsory Acquisition Schedule*.

Within these official tracking logs, the Applicant explicitly records data rows confirming that active regional land negotiations are being

executed exclusively *"under Option Agreement subject to standard commercial confidentiality terms."* This dual-track strategy places host community farmers in a difficult legal position: while facing the statutory shadow of compulsory purchase enforcement across the entire site boundary, the inclusion of these strict confidentiality clauses legally prevents them from publicly addressing aspects of the project, sharing commercial parameters with neighboring parish councils, or rescinding the agreement if they subsequently determine the development threatens their family's long-term agricultural survival. This framework limits local operators' ability to reverse their position, locking them into an irreversible land hand-over while introducing an artificial distortion of community consent on the open examination record. Siting a Nationally Significant Infrastructure Project under conditions that

contractually restrict primary agricultural stakeholders contradicts the transparency and public disclosure principles mandated by the Planning Act 2008.

- Question to the Applicant 25: Given the capacity limitations of the Norwich Main to Bramford transmission corridor, will the Applicant provide the detailed engineering models showing how this project can export its full capacity during peak daylight hours without triggering mandatory commercial curtailment by the network operator?
- Question to the Applicant 26: Given that Document [4.2](#) establishes 100% ultimate ownership under Macquarie Asset Management, what legally binding corporate financial guarantees will the Applicant place on the open record to ensure that long-term land remediation, community health

liabilities, and circular lifecycle
decommissioning costs are fully protected
from highly leveraged debt-allocation
models historically documented in previous
United Kingdom utility portfolios under the
same parent framework?

SECTION 8: STRUCTURAL MITIGATION CRITERIA & EXTENDED LAND USE PROTECTION

1. Corporate Identity and Balance Sheet Liability

The Applicant's organizational structure
separates localized project risks into a limited-
liability Special Purpose Vehicle (SPV) shell

framework. In accordance with the precautionary principle and to protect the local authority and host landowners from long-term insolvency firewalls, the Examining Authority is requested to require a binding parent-company guarantee. All statutory, environmental, and financial decommissioning liabilities must rest directly upon the global balance sheet of the ultimate parent conglomerate, Macquarie Asset Management, ensuring full financial resource availability over the complete forty-year project lifecycle.

2. Technical Modification Thresholds and Consultation Integrity

A technical discrepancy exists regarding infrastructure upscaling, where initial community engagements focused on low-profile regional feeds before the design

transitioned to an extra-high-voltage export platform. To preserve the integrity of the public consultation process under Nationally Significant Infrastructure Project (NSIP) guidelines, any post-consultation alteration to core electrical specifications—such as upscaling substation parameters or expanding Battery Energy Storage System (BESS) footprints—constitutes a material change to the environmental baseline. Such alterations must automatically trigger a formal consultation reset and a secondary public scrutiny window rather than pushing cumulative infrastructure expansions into post-consent requirements.

3. Protection Against Piecemeal Deployment (Gateway Creep)

The proposed development footprint must be evaluated under a strict cumulative impact

assessment framework. Planning authorities must explicitly reject any piecemeal infrastructure deployment models where localized components are presented as isolated, localized assets to bypass macro-scale environmental review. The Examining Authority must evaluate the cumulative asset totals, landscape saturation levels, and grid capacity thresholds across the wider South Norfolk regional corridor as a single, combined infrastructure constraint.

4. Grid Capacity Liability and Financial Balancing

The documented capacity limits of the Norwich Main to Bramford transmission corridor present a high probability of daytime generation bottlenecks. To protect the public interest from artificial asset management models, the

developer must remain financially liable for localized network stabilization costs. No taxpayer-funded constraint payments should be allocated to fund commercial generation suspension. If the operator is unable to curtail generation during peak regional surges, any resulting property damage, infrastructure degradation, or localized business interruption losses must be fully indemnified via government clawbacks directed straight to the parent company balance sheet.

5. Residential Amenity Asset

Protection & Property Reinstatement

Siting heavy industrial 400 kV infrastructure within close proximity to residential boundaries introduces severe long-term blight to the local human environment. To safeguard vulnerable residents who face the permanent degradation

of their domestic envelopes, the development consent conditions must secure an open-ended property buyout option. Homeowners within the immediate impact zone must retain a legally binding right to mandate an asset buyout pegged directly to an independent assessment of the property's value prior to the project's initial public proposal or map publication. This option must remain executable at any point during the construction or operational lifecycle, with the developer bearing all associated legal, transactional, and relocation fees to ensure equivalent, asset-for-asset financial reinstatement in an unblighted rural location.

- Question to the Applicant 27: Will the Applicant formally confirm on the open examination record that following the parameter increase from a 132 kV class to a 400 kV extra-high-voltage class substation

at Site One, 100% of the generated electricity will bypass localized South Norfolk distribution networks to feed directly into the national transmission spine via the Norwich to Bramford overhead line corridor?

- Question to the Applicant 28: Will the Applicant clarify on the open record exactly how many individual substations—specifying both 400 kV and 132 kV voltage classes—are to be constructed under this Development Consent Order, and explain why these structures are mapped on the plans but obscured within the technical text?
- Question to the Applicant 29: Given that specific hardware models remain uncommitted until post-consent procurement, and that the submitted Environmental Statement evaluates acoustic impacts based solely on a

framework protects residents with neurodivergent profiles or sensory processing differences from un-filterable low-frequency substation harmonic hums?

- Question to the Applicant 30: Given that the specific parcel of land targeted for the battery energy storage complex and the second of the three proposed 400 kV substations sits under an active, state-funded Countryside Stewardship agreement, will the applicant clarify how the destruction of this protected rural habitat aligns with the scheme's environmental mandates?
- Question to the Applicant 31: Given the capacity limitations of the Norwich to Bramford transmission line, will the Applicant provide the detailed engineering models showing how this project can export

its full capacity during peak daylight hours without triggering mandatory commercial curtailment by the network operator?

- Question to the Applicant 32: Given that the proposed cable route corridor requires deep ground excavation, trenching, and tunneling directly through the open fields past Hardwick village within a high-risk historical flight-path approach zone, why does the applicant propose to delay detailed unexploded ordnance desk studies and physical magnetometry scanning until the post-consent phase?

SECTION 9: PROCEDURAL SCRUTINY AND ABSOLUTE RESUBMISSION

RESTRICTIONS

1. Implementation of a Single-Verdict Invalidation Parameter

To preserve the statutory purpose of the public examination process and protect the resources of the local planning authority, the development consent conditions must incorporate a strict resubmission restriction. If the Examining Authority recommends a total refusal of this Development Consent Order (DCO) to the Secretary of State, or if localized planning vetos are registered against the core technical specifications, a permanent bar on near-identical resubmissions must be enforced.

2. Prevention of Fragmented Re-branding and Shell Subsidiary Evasion

Multinational parent conglomerates frequently

utilize complex networks of limited-liability subsidiaries or Special Purpose Vehicles (SPVs) to bypass local infrastructure rejections.

Following a final refusal of the East Pye Solar project, the ultimate global parent company, Macquarie Asset Management, alongside any past, current, or future subsidiary operating under their corporate umbrella, must be legally barred from resubmitting a modified, scaled-down, or re-branded version of this development layout within the regional boundary.

The developer cannot be permitted to use infinite legal funds to initiate a cyclical re-application process. Any secondary infrastructure proposal that relies on the same localized grid connection parameters or targets the same agricultural land parcels must be automatically disallowed, ensuring complete finality to the examination's verdict and

protecting the local human environment from protracted planning instability.

SECTION 10: GEOGRAPHIC SITING AND INFRASTRUCTURE ALTERNATIVE ANALYSIS

1. Technical Parameters and Mechanical Footprint Profile

The engineering specifications detailed within the Applicant's Environmental Statement reveal a highly industrialized deployment footprint that differs significantly from low-profile, static imagery. The proposed 2,718-acre East Pye Solar layout occupies a substantial regional landmass and is contractually mandated to

deploy bifacial modules mounted on active single-axis tracking systems.

Tracking panels continuously rotate up to 60 degrees along a dynamic east-to-west trajectory. To ensure adequate ground clearance at peak tilt, the modules require elevated central torque tubes, binding the maximum structural parameters to a peak height of [4.5](#) metres. This elevation exceeds standard single-story residential envelopes and traditional 2-metre hedgerow screening boundaries. Furthermore, the continuous operation of automated tracking motors, rotating joints, and torque driving gears introduces a persistent mechanical acoustic baseline across the localized rural receptor zone.

2. Population Density and Spatial Allocation Disparities

The spatial planning frameworks deployed for this layout attempt to transpose infrastructure models designed for low-density, arid continental zones onto a highly crowded, historic island landscape. While global utility-scale solar arrays are typically situated on barren topography with a population density tracking under 1 person per square kilometre (such as the Gobi Desert or the Khavda Renewable Energy Park), the South Norfolk regional corridor maintains an elevated human density averaging 150 people per square kilometre.

Because there are no empty plains within the Order Limits, high-voltage infrastructure and [4.5](#)-metre tracking matrices are positioned as close as 200 metres from private residential windows. Land-use data confirms that regions exceeding a density baseline of 50 people per square kilometre cannot accommodate

extensive field-scale generation assets without triggering severe landscape degradation and the direct subversion of active agricultural space.

3. Farmland Displacement and Cumulative Carbon Imbalances

The proposed development footprint intersects high-yield agricultural land columns that are critical to domestic food security. Agricultural Land Classification (ALC) audits confirm that 86% of the targeted East Pye site occupies premium, irreplaceable Best and Most Versatile (BMV) farmland. The systematic removal of high-yield arable land across the regional solar pipeline erases significant domestic production capacity for essential grain and vegetable crop cycles.

Because regional food consumption demands remain constant, the food deficit requires a

direct reliance on carbon-heavy maritime cargo, air freight, and commercial road transport imports from international markets. This process directly increases net transport emissions, outsourcing the resulting environmental damage and supply-chain vulnerabilities to other nations while degrading the domestic agricultural baseline.

4. Regional Energy Surplus and Grid Export Dynamics

A significant mismatch exists between the localized physical disruption of the infrastructure corridor and the actual low-voltage power supply available to the host community. Grid capacity tracking data indicates that the peak electricity demand ever consumed across the entire local distribution network at maximum load is limited to 1,281

Megawatts. Existing regional generation assets already produce a substantial surplus of approximately 6,552 Megawatts, leaving the South Norfolk sector in a permanent energy surplus.

The extensive network infrastructure cutting through local parishes—including the proposed 114-mile Norwich to Tilbury 400 kV pylon corridor—is explicitly engineered to carry over 6,000 Megawatts of power completely out of the region. This high-voltage transmission superhighway is configured to feed the centralized energy demands of Greater London and distant artificial intelligence data center corridors, meaning local communities absorb 100% of the visual, structural, and agricultural blight while receiving 0% of the direct low-voltage energy benefit.

5. Land-Preserving Alternative

Generation Frameworks

Achieving national clean energy deployment targets does not require the subversion of high-utility agricultural land or the erasure of local democratic consent. Three viable, land-preserving alternatives exist to meet generation mandates:

- Commercial and Industrial (C&I) Rooftop Strategy: Prioritizing the built environment over productive farmland protects the agricultural breadbasket. Utilizing the extensive available roof space across the UK logistics, manufacturing, and cold-storage warehouse sectors can generate substantial clean energy annually. Rooftop solar operates entirely "behind-the-meter," consuming electricity directly at the point of origin. This localized approach eliminates the multi-billion-pound requirement for new

high-voltage rural transmission lines and standalone rural substations, as the power does not require inter-provincial extraction.

- **Standardised Multi-Use Agrivoltaics:** Where solar infrastructure is deployed on agricultural acreage, planning conditions must mandate strict multi-use frameworks rather than single-use land clearance.

Utilizing vertical panels or hyper-elevated arrays raised 3 to 5 metres with wide row separation allows standard farming machinery to operate unimpeded. This architecture supports the simultaneous production of livestock, crops, and renewable energy on the same acre, protecting soil moisture during extreme heatwaves and achieving zero net loss to national agricultural output.

- **Small Modular Reactors (SMRs) for Intense Tech Demands:** To power the continuous,

high-intensity electrical loads of the digital infrastructure sector without consuming hundreds of thousands of acres of rural land, next-generation nuclear power provides a space-saving solution. A standard 500 MW solar array requires up to 3,000 acres of land, whereas a single Small Modular Reactor (SMR) matches that identical power output on a physical footprint smaller than two football pitches. SMR units can be co-located directly next to urban technology parks, providing reliable, [24/7](#) baseload energy while entirely removing the need for rural pylon corridors and massive, standalone battery storage facilities (BESS) across rural parishes.

SECTION 11: MACROECONOMIC CONSTRAINTS AND REGIONAL ENERGY INFRASTRUCTURE BALANCING

1. The Rural Socio-Economic Baseline and Domestic Fuel Exposure

The human environment intersecting the proposed infrastructure corridor is characterised by specific rural utility vulnerabilities that compound regional financial hardships. Because significant sectors of the South Norfolk and Mid Suffolk populations reside entirely off the national mains gas grid, domestic heating and seasonal thermal regulation depend completely on independent kerosene (domestic heating oil) infrastructure.

An audit of this regional fuel market reveals two

major economic vulnerabilities for the local population:

- **Exposure to Global Commodity Benchmarks:** Unlike regulated mains utilities, domestic heating oil operates within an unregulated open market. Although crude oil assets are extracted within United Kingdom territorial waters, asset ownership rests with multinational corporate operators who trade the resource on international commodity exchanges. Local consumers receive zero regional pricing offsets and remain fully exposed to global supply shocks, causing local home heating costs to fluctuate based on international trading volatility.
- **Currency Conversion Penalties:** Because global energy commodities are traded exclusively in US dollars, local fuel

international currency valuation shifts. Any weakening of the British Pound sterling against the Dollar introduces an immediate exchange rate penalty that is passed directly to the rural consumer, increasing domestic material deprivation across low-income households.

2. The Extraction Pipeline Model and Public-Private Risk Asymmetry

The structural relationship between top-down government infrastructure incentives and multi-billion-pound investment firms reveals an identical economic pattern spanning both the offshore extraction sector and the onshore utility-scale solar sector. This model relies on public frameworks to lower the financial risks for foreign-backed conglomerates, resulting in

a systemic asymmetry where local communities absorb the physical disruption while the financial rewards are exported out of the host region.

- **Subsidised Risk Mitigation:** The state utilizes financial frameworks—including Capital Allowances, tax relief loops, and the Contracts for Difference (CfD) revenue-guarantee scheme—to shield global investment firms from market risk. These corporate subsidies lower the barrier for asset deployment across rural environments without requiring the developer to demonstrate a direct, tangible benefit to the immediate host economy.
- **Bypassing Local Distribution Infrastructure:** The physical infrastructure cutting through local parishes is not engineered to interface with the low-voltage local distribution lines

that power the immediate area. Instead, the 2,718-acre solar matrix and associated 400 kV substations connect directly into the high-voltage national transmission spine.

- **The Resource Mismatch:** This architecture functions as an extraction pipeline. The host countryside bears 100% of the long-term visual blight, heavy HGV construction traffic, and deep underground cable trenching. However, 100% of the energy benefit is transmitted completely out of the region to feed high-demand, centralized urban targets, specifically Greater London and distant artificial intelligence data centre corridors. The rural population is forced to absorb the physical constraints and system infrastructure risks, while the multinational parent organization privatises and exports the operational profits.

SECTION 12: HISTORIC LANDSCAPE CHARACTERISATION AND STATUTORY HEDGEROW PROTECTION

1. Statutory Hedgerow Criteria and Boundary Integrity

The proposed development footprint and its associated infrastructure corridors intersect linear features that constitute legally "Important Hedgerows" under the Hedgerows Regulations 1997. Specifically, the trackway of Hundred Lane delineates the historical administrative boundary of the Depwade Hundred separating the parishes of Great Moulton and Tivetshall,

while Frith Way forms the historical parish boundary between Great Moulton and Wacton. Under the statutory criteria of the 1997 Regulations, any hedgerow that marks the boundary of a pre-1850 administrative area, historic estate, or parish boundary qualifies automatically for protective status. The Applicant's environmental filings omit a specific historical landscape characterisation of these ancient boundary lines. Consequently, any physical interventions, clearance of vegetation, or breaching of these linear features for cable trenching along Frith Way or Hundred Lane presents a direct regulatory conflict with the Hedgerows Regulations 1997.

2. Microclimate Topography and Natural Acoustic Attenuation

The historic tracks and boundary roads

characterizing this zone—specifically the undisturbed alignments of Hundred Lane, Narrowgate Way, Frith Way, and Lodge Lane—possess established multi-species canopies and extensive, deep root systems developed over a protracted historical baseline. This dense, uncultivated vegetation forms a distinct local microclimate that provides substantial natural acoustic attenuation.

The Applicant's environmental noise models utilize standard, flat-topography assumptions that fail to reflect the structural absorption capacity of these historic green corridors. Any physical clearing or altering of these ancient linear boundaries to accommodate infrastructure routes or construction access will permanently degrade the natural acoustic insulation currently protecting nearby sensitive residential receptors from low-frequency substation harmonic drone.

3. Substantial Harm to Irreplaceable Landscape Heritage Assets

The ancient administrative hundred lines and inter-parish boundary roads represent non-designated landscape heritage assets of regional significance. Under National Policy Statements for energy infrastructure, the preservation of historic landscape character must be accorded significant weight by the Examining Authority. Siting a high-density 400 kV substation footprint, a Battery Energy Storage System (BESS) complex, and extensive solar array groupings immediately adjacent to the Depwade hundred line, Frith Way, and Narrowgate Way constitutes a disruptive intervention that alters the historic landscape setting.

The physical insertion of heavy high-voltage

components over and alongside these ancient boundary trackways permanently severs the continuity of the landscape, failing the planning tests for heritage asset preservation and sustainable resource allocation.

SECTION 13: CUMULATIVE SOCIO-ECONOMIC, ECOLOGICAL, AND INFRASTRUCTURE STRAIN

1. Demographic Vulnerability and [24/7](#) Residential Amenity Exposure

In accordance with the Equality Act 2010 Public Sector Equality Duty (PSED), the Examining Authority must assess the disproportionate impact of heavy construction and operational

noise on highly concentrated senior populations. Office for National Statistics (ONS) 2021 Census data at Output Area level identifies the station road and local parish development zone as a high-density senior residential baseline. Output Area E00136706 (Aslacton) registers a baseline of 18.1% entirely over-66 senior households, while Output Area E00136751 (Great Moulton) registers 17.1%. This includes the age-restricted residential enclave at Downsland Park, which comprises 29 park homes. These regional baselines are nearly double the national average of 9.2%.

Simultaneously, the density of households with dependent children tracks below 5.9% across the Order Limits. This indicates an aging-in-place population with a high statistical probability of continuous, 24-hour domestic occupancy.

Receptors completely lack daytime occupational respite, exposing vulnerable

residents to uninterrupted construction impacts. Furthermore, the post-consultation design transition from a 132 kV local connection to a 400 kV extra-high-voltage National Grid substation complex introduces a permanent, [24/7](#) low-frequency acoustic and sensory harmonic thrum. Non-standard, lightweight park home structures are structurally incapable of attenuating this low-frequency drone or resisting ground-borne vibrations, threatening the health baselines of local sensitive receptors.

2. Electromagnetic Field (EMF) Interventions and Wild Pollinator Navigation

The deployment of a high-density, field-scale electrical grid across a 2,700-acre agricultural plateau introduces significant electromagnetic and polarized light interventions into the rural

ecosystem.

- **Scrambled Navigation Vectors:** Native wild pollinators, including bumblebees and honeybees, depend on fine-grained magnetoreception and electro-reception systems to chart flight paths between hives and foraging targets. The extensive network of low-frequency EMF currents generated by grid-scale industrial inverters and substations presents a documented risk of scrambling these internal biological compasses, causing widespread homing failure.
- **Landscape-Scale Ecological Sinkhole:** Because foraging honeybees maintain an operational flight radius of 3 to 5 miles, the physical footprint of the array acts as an ecological sinkhole. It draws in wild pollinator populations from outlying

across the wider South Norfolk landscape. Scrambling the biological tracking of these populations presents a systemic threat of local colony collapse, directly undermining the pollination viability of regional arable crop cycles and compounding existing climate stresses.

3. Hydrological Constraints and Emergency Response Deficits

The draft emergency response framework relies on unverified assumptions regarding local infrastructure capacity and emergency service deployment timelines during a high-consequence infrastructure failure or battery energy storage system (BESS) thermal runaway event.

- Water Suppression Architecture Omissions:

exclusively by unmanned, on-call retained fire stations (including Long Stratton and Attleborough) that lack specialized hazardous material containment equipment. Standard water-based suppression cannot be safely deployed on live 400 kV electrical assets or chemical lithium-ion BESS arrays due to high-voltage electrocution pathways and the generation of highly toxic, corrosive Hydrofluoric acid runoff.

- Mains Hydrological Deficits: Local water infrastructure operates under tight regional capacity constraints, exacerbated by high-volume industrial abstraction proposals within the South Norfolk area. Local water mains completely lack the volume and pressure required to manage large-scale industrial fires. In a wind-driven event on the tinder-dry plateau, a fire presents a

risk of burning uncontrolled, destroying legally protected ancient hedgerows along the Hundred Lane boundary and directly encroaching upon nearby residential properties without any coordinated evacuation framework from the Applicant.

4. Grid Capacity Over-Subscription and Decentralized Rooftop Alternatives

The technical justification for the compulsory acquisition of thousands of acres of agricultural land is undermined by the financial realities of national grid capacity distribution.

- The Curtailment Fee Burden: Because regional transmission line corridors face systematic over-subscription during peak

summer generation surges, the electricity network operator will be forced to implement mandatory commercial curtailment. The developer will be paid millions of pounds in public-funded constraint payments to keep the solar arrays disconnected from the grid. This corporate subsidy model adds financial balancing charges straight back onto domestic consumer energy bills, penalizing low-income households.

- **Decentralized Capital Re-Allocation:** The estimated [£1.05](#) billion corporate capital expenditure required to execute this field development is mathematically equivalent to allocating an individual £8,700 infrastructure grant to all 115,000 households marketed in the Applicant's literature. Redirecting capital to fund decentralized domestic rooftop solar across

at an upfront consumer cost of £0. Rooftop infrastructure generates electricity directly behind-the-meter at the point of consumption, completely avoiding regional grid congestion, protecting finite Best and Most Versatile (BMV) soil columns, and permanently lowering consumer standing charges.

- Question to the Applicant 33: Given the documented precedent in Case 6 where the parent company divested from a critical utility leaving unaddressed public safety omissions across the network footprint, what legally binding guarantees will the Applicant introduce to ensure that safety monitoring protocols are maintained as the East Pye BESS matrix ages and its structural volatility peaks? Furthermore, will the

Applicant confirm the exact value of the public liability insurance secured for this site, and commit to a legally binding, parent-backed indemnity bond to guarantee that emergency remediation and casualty funding is instantly available, rather than leaving the financial and human liabilities ring-fenced inside an under-capitalised SPV? If the Applicant intends to rely on a future indemnity bond framework, what will be the precise calculated financial scale of that bond, and what independent, non-corporate actuarial body will be contractually appointed to assess the necessary monetary value required to cover a multi-property failure? Finally, if a court awards multi-million-pound damages to impacted residents following an operational failure, how will the Applicant guarantee that the indemnity bond will remain active and

solvent across the entire lifecycle of the project to fund consecutive claims, immediate emergency rehoming, and the mandatory purchase of blighted properties at their true, pre-incident market value instead of allowing the SPV to execute bankruptcy to evade court-ordered liabilities?

- Question to the Applicant 34: Given that the project framework includes mechanisms where local residents can request that East Pye Solar purchase their blighted properties, will the Applicant clarify on the open examination record exactly how they intend to manage or dispose of these residential landholdings over the operational lifecycle of the development? What structural guarantees exist to ensure that these homes are not converted into leveraged fund assets or utilized for commercial corporate

remaining residential boundary lines of these host parishes?

- Question to the Applicant 35: When the central BESS infrastructure reaches the end of its operational lifespan and its cells are spent, what are the Applicant's exact, contractually binding recycling and disposal parameters for these lithium-ion battery blocks? What physical containment facilities, specialized chemical processors, and localized heavy transport logistics rules are hardcoded into their decommissioning budget to guarantee that these degrading materials do not leak toxic chemical residues or heavy acids into the South Norfolk water table during the extraction and transport phases?
- Question to the Applicant 36: Given the substantial liabilities associated with

executing complete site remediation—including the removal of deeply driven steel foundation piles and thousands of metres of sub-surface cabling networks—what legally binding, ring-fenced financial decommissioning pot or escrow account will the Applicant establish prior to construction to ensure these costs are fully covered? Furthermore, if the Special Purpose Vehicle (SPV) files for bankruptcy at the end of the operational lifecycle, or if the parent company executes a strategic divestment under 'Transfer of Benefit' rules, what structural guarantees ensure that this decommissioning fund remains legally tethered to the asset and fully solvent? If no parent-backed, non-transferable financial bond is hardcoded into the DCO requirements to secure this remediation pot, will the Applicant clarify whether local

farming businesses face an immediate risk of inheriting cleanup liabilities for an abandoned industrial facility when the corporate owners walk away?

- Question to the Applicant 37: Under the compulsory acquisition powers sought within this DCO, the Applicant is executing a permanent structural transformation of private agricultural holdings. Will the Applicant clarify on the open examination record exactly what happens to the title, ownership, and zoning control of this land at the end of the operational lease? Once the generation lifecycle concludes, does the land contractually revert back to the original agricultural families as unencumbered, fully remediated food-producing soil, or does it permanently remain within the asset portfolio of a private corporate entity to be sold off or repurposed for further heavy

industrial development?

- Question to the Applicant 38: Given that the project relies on securing voluntary option agreements with local agricultural operators while concurrently seeking sweeping compulsory acquisition powers across the entire development boundary, will the Applicant clarify the exact methodology utilized to secure compliance from landowners under the statutory shadow of forceful land seizure? Furthermore, if these options are genuinely voluntary, why is the sweeping use of compulsory purchase powers required on all covenanted land parcels across these host parishes?
- Question to the Applicant 39: If the Development Consent Order (DCO) is granted and the Applicant chooses to execute their compulsory acquisition powers over targeted agricultural holdings,

clarify the exact financial mechanism of that takeover? Specifically, will the Applicant maintain the rolling operational lease and rent payment structures promised during initial negotiations, or will they execute a one-off compulsory purchase of the freehold, permanently stripping the farming family of their asset for a single lump sum and removing the land from the local agricultural economy?

- Question to the Applicant 40: Given that an application under the Planning Act 2008 is statutorily mandated to operate as an open, transparent public interest process, will the Applicant clarify what planning purpose is served by requiring local agricultural operators to sign private confidentiality clauses as a condition of property negotiations? Specifically, does the

Applicant negotiate compensation rates based transparently upon active Agricultural Land Classification (ALC) soil metrics—paying a distinct and separate premium rate for Grade 2 Best and Most Versatile (BMV) acreage as opposed to Grade 3a or 3b columns—or are these confidentiality clauses utilized to prevent neighboring farmers from discovering disparate valuation and payment frameworks across these host parishes?

- Question to the Applicant 41: Will the Applicant clarify the exact contractual and legal recourse they intend to execute if a local farmer who has signed an option agreement subsequently decides to rescind or reverse their position prior to the final determination of this DCO? If a farming business determines that the layout parameter escalations or downstream

decommissioning liabilities pose an unmitigated threat to their multigenerational livelihood, does the Applicant's contractual framework permit them to lawfully withdraw their consent, or will the Applicant deploy corporate enforcement actions and compulsory purchase powers to lock them into an irreversible land asset hand-over?

- Question to the Applicant 42: Will the Applicant clarify what specific operational window and timeline was contractually permitted for local farming families to review, digest, and audit the terms of these complex option agreements prior to execution? Furthermore, will the Applicant confirm whether landowners were fully permitted and financially supported to retain their own independent agricultural solicitors to rigorously negotiate and adjust these contracts on an equal footing, or were these

option agreements presented as rigid, time-limited frameworks with unnegotiable parameters?

SECTION C: EVIDENCE APPENDIX INDEX

The source documents submitted by the author to verify the baseline parameter shifts, cumulative infrastructure saturation, and regional network over-subscription argued within this representation include:

- EXHIBIT 1 (East Pye Letter): Official targeted consultation correspondence from East Pye Solar Limited dated 22 October 2025, confirming the proposed substation

East Pye
SOLAR

22 October 2025

Dear Sir/Madam,

East Pye Solar – Targeted Consultation: 22 October to 26 November 2025

On behalf of East Pye Solar Ltd, I am writing to you to inform you of the launch of a targeted consultation we are holding on our proposals. After we consulted on our plans for East Pye Solar earlier this year, we have made a number of changes to our proposals and are now consulting on these changes.

I am writing to you now either because you live near the proposed changes or because we wrote to you as part of our last consultation. Please see below information on the proposed changes that are being consulted on, and how you can provide feedback.

What is East Pye Solar?

East Pye Solar Limited is proposing plans for a utility-scale solar park and battery energy storage system (BESS) project, known as East Pye Solar, to be located within the administrative boundaries of South Norfolk Council and Norfolk County Council. If consented, the Scheme has the potential to provide up to 500 megawatt (MW) of electricity, enough to power approximately 115,000 homes annually.

Due to the Scheme's size, it is classified as a Nationally Significant Infrastructure project (NSIP). This means that the Scheme will submit its application to the Planning Inspectorate (PINS), on behalf of the Secretary of State, who will ultimately decide whether to grant the project a Development Consent Order (DCO).

Targeted Consultation

We are holding this round of consultation from **Wednesday 22 October until 23:59 on Wednesday 26 November 2025**. During this time, you have the opportunity to comment on these changes. We encourage you to submit any feedback you may have using the details provided at the end of this letter.

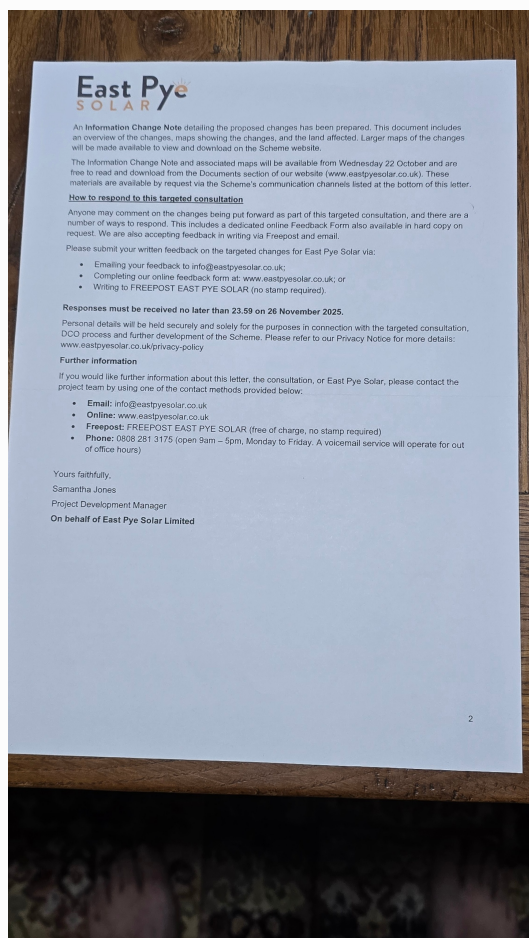
Following the Phase Two statutory consultation, which took place between 18 June and 6 August 2025, we are now carrying out a further round of targeted consultation, focusing on a number of specific changes to the proposals for East Pye Solar.

These changes have been informed by further design work and due diligence, ongoing consideration of consultant feedback, and findings from the ongoing environmental impact assessment process.

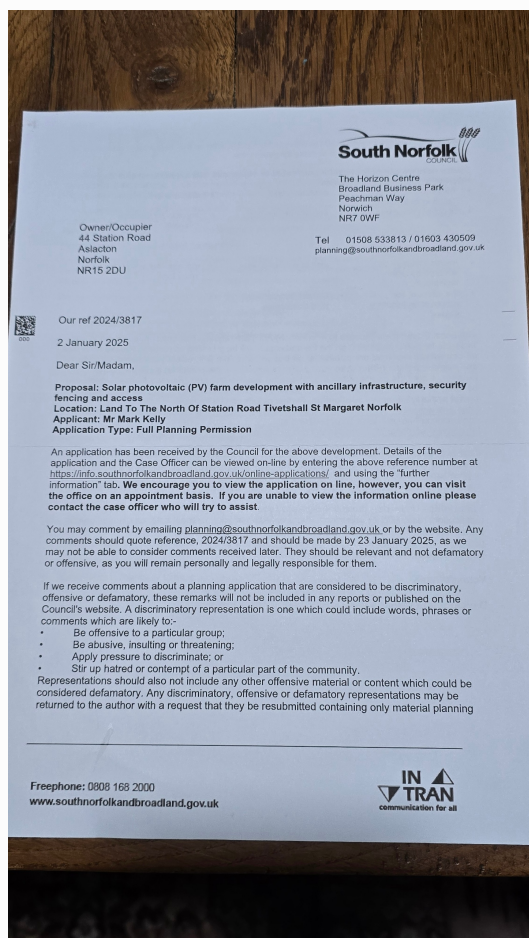
Separately, the feedback we received during Phase Two consultation is continuing to be considered as we further refine our designs ahead of the DCO submission, which is now anticipated to be in early 2026. This revised submission date provides time for us to consider feedback received from the targeted consultation, as well as the results of ongoing design work and environmental assessments.

summary, the changes to the Scheme boundary are in relation to:

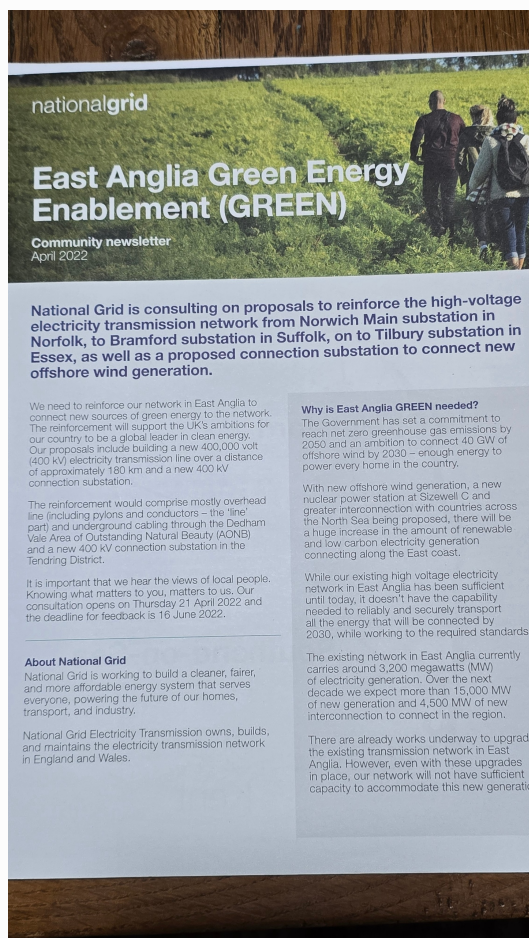
- Additional small areas of land have been included adjacent and to the northeast of Site 1; and to the southwest of Site 1 associated with the works connecting the new National Grid Substation to the existing overhead transmission electric lines.
- Additional small areas of land throughout the Scheme associated with updates to highway visibility displays, have been included.
- Additional small areas of land throughout the Scheme to accommodate abnormal indivisible loads (AIL) that could result in highway works, temporary removal of street furniture and/or vegetation removal, have been included.
- Confirmation that the Applicant intends to place the new National Grid substation within site 1B, and will not be pursuing the additional option to the south (that was consulted upon at the statutory consultation stage).
- Confirmation of the location and size of the substation in Site 1B (which is proposed to increase from 132kv to 400kv).
- An area within Site 7D where additional solar PV panels have been included.



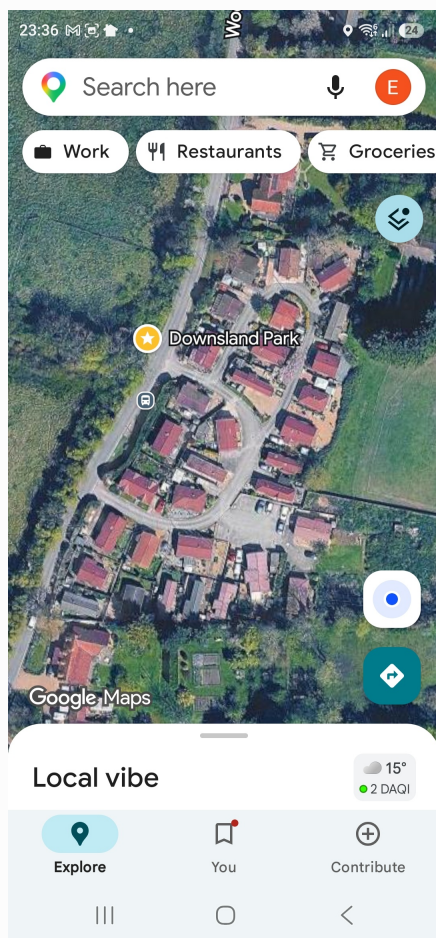
- **EXHIBIT 2 (South Norfolk Council Letter):**
Official local planning notification (Ref: 2024/3817) regarding a commercial solar farm application at Land North of station road, B1134 proving localized encirclement near the Tivetshall Maltings node.



- EXHIBIT 3 (National Grid GREEN Newsletter): National Grid Strategic Infrastructure Disclosure dated April 2022 detailing the 400 kV high-voltage transmission reinforcement corridor proposals between Norwich and Tilbury.



- EXHIBIT 4 (Downsland Park Aerial Layout): High-resolution satellite close-up of the Woodrow Lane development, illustrating individual building coordinates, the separate entrance and exit gateways, and directional routing vectors defining the loop layout.



- EXHIBIT 5 (Black Mill Lane Crossing Layout):
Street visual baseline record of the manual
user-operated level crossing checkpoints on
the regional rail line corridor servicing Black
Mill Lane.



- EXHIBIT 6 (Defra MAGIC Map Database): Official UK Government multi-agency geographic database record mapping active, legally binding Countryside Stewardship Management Agreements across the targeted Site One development boundaries.

