

Submission ID: [REDACTED]

FIRSTLY - Written copy of oral representation delivered by Stuart Shearer at the Open Floor Hearing at Dunston Hall, submitted at the request of the panel leader. The covering note identifies two factual corrections made since delivery and lists subsequent written submissions. The speech text is unchanged from what was delivered.

SECONDLY - Response to EXAM/9.1 — Applicant's Draft ASI Itinerary. Requests three additional Site 8 locations: St Mary's Church footpath, Hawes Green and [REDACTED] curtilage (access confirmed), and Market Lane western boundary of Sub-Site 8A. Also requests reinstatement of South Norfolk Council's Shotesham footpath suggestion.

East Pye Solar — EN0110014 | Open Floor Hearing

Property:

PINS Reference:

Submitted to PINS: 4th October 2026

This document is submitted at the request of the panel leader following the Open Floor Hearing at Dunston Hall on [insert date]. The text below is the speech as delivered. It is submitted without amendment to the delivered version so the examination record accurately reflects what was said.

- Written Representation — Stuart and Jane Shearer (joint) — 14 sections covering visual impact, RVAA methodology, tracker panel orientation, glint and glare, ecology, heritage and construction traffic
- Written Representation — Jane Shearer (individual) — focusing on the Hawes Green heritage cluster, RVAA exclusion, Highfield errors, topographical screening failure and heritage law
- Addendum to Jane Shearer's Written Representation — correcting distances to Site 8 (nearest physical boundary of Sub-Site 8A is 820 metres as the crow flies, not 1.2 miles road distance) and strengthening the RVAA argument (the Property is only 320 metres beyond the developer's own 500 metre study area threshold)
- First Supplementary Written Representation — addressing APP/7.18 Design Principles, Parameters and Commitments — panel type flexibility and post-consent design risk
- Second Supplementary Written Representation — addressing Historic England's Section 56 Relevant Representation (EN0110014-000340), the Sunnica Energy Farm precedent (EN010085), NPS EN-1 wholly exceptional justification, and GPA3 sequential and kinetic views

One factual point in the speech below requires a correction: the distance to Site 8 was stated as 1.2 miles. This was road distance. The correct straight-line distance as the crow flies to the nearest physical boundary of Sub-Site 8A along Market Lane is approximately 820 metres. This correction and its significance for the RVAA exclusion argument are set out fully in the Addendum to Jane Shearer's Written Representation.

One further correction: the reference to panels being visible was based on our assessment of the landscape. We have since established from the application documents that the Shotesham-Woodton Hornbeam Woods SSSI (which includes Shotesham Little Wood) sits broadly to the south and south-west of the direct line of sight from Hawes Green toward the nearest panels of Sub-Site 8A, and does not provide meaningful screening of those nearest panels from the Hawes Green viewpoint. The bottom line however remains unchanged — the panels will be visible from Hawes Green and from the historic footpaths around St Mary's Church, as acknowledged by the developer's own documents.

The speech as delivered begins below. Font enlarged for ease of reference.

Good afternoon, members of the Examining Authority.

My name is Stuart Shearer. I live at [REDACTED] — part of a Grade II listed residential cluster alongside Church View Barn and [REDACTED], immediately next to St Mary's Church, Grade II* listed, and the ruins of St Martin's Church, Grade II listed.

Under the *Barnwell Manor* judgment, the law requires you to give considerable importance and weight to harm to the settings of these listed buildings. The National Planning Policy Framework requires clear and convincing justification for any such harm. That justification has not been provided.

Site 8 sits 1.2 miles to our east along Brooke Road. Its 4.5 metre tracker panels will be highly visible from the historic footpaths around our homes and churches within minutes of our doorsteps.

Two Serious Errors

The developer's assessment contains two serious errors.

First — in Appendix 7.4, the visual receptor on our ridge is listed as a commercial holiday lodge called Highfield Lodge Holiday Home. It does not exist. The property is a permanent residential home — Highfield House — sitting within our heritage cluster. Their own masterplan maps then place that same property off Highfield Road in Brooke — over 3 miles from St Mary's Church as the crow flies. The developer's surveyors have placed the most sensitive receptor in the vicinity of Site 8 more than 3 miles from where it actually stands. The result is that the most sensitive residential and heritage receptor cluster near Site 8 has been erased from the visual assessment entirely.

Second — the developer claims visual impact on Hawes Green is insignificant, yet elsewhere admits that glimpses and glimmers of the arrays will be visible from the footpaths of a Grade II* listed church. That is a direct contradiction. An admission of a glimpse is an admission of an unmitigated line of sight. Table 7.4 lists twenty-one assessed viewpoints for Sites 7 and 8. Hawes Green does not appear in a single one.

The Screening Does Not Work

The proposed screening fails on two counts. Valley-bottom hedges at thirty metres above sea level cannot screen panels on rising ground, viewed from our ridge at thirty-eight metres. And the deciduous woodland relied upon is bare for six months every year.

Three Requests

I request three things.

One — the Applicant corrects both Highfield errors and reassesses the visual impact on our cluster.

Two — a verified topographical cross-section is produced from St Mary's Church path to Site 8 to prove the screening mathematics.

Three — an Accompanied Site Inspection from Hawes Green.

Summary

To summarise what this developer has actually done:

They misidentified a permanent family home on our road as a holiday lodge in a statutory document.

They then placed that same property more than 3 miles away on their own maps.

They acknowledged glimpses from a Grade II starred churchyard and called the impact insignificant.

They proposed valley-bottom hedges to screen a ridge-top community and called it adequate mitigation.

And they have not conducted a single Residential Visual Amenity Assessment from the most sensitive heritage cluster near Site 8.

That is not an adequate basis for consenting a forty-year industrial installation in one of Norfolk's most significant Conservation Areas.

Please reject Site 8. Thank you.

Note: The distance stated in the speech as 1.2 miles reflects road distance. The corrected straight-line distance to the nearest site boundary is approximately 820 metres as the crow flies. The Brooke

distance of over 3 miles refers to the distance from St Mary's Church to where the developer's masterplan maps incorrectly place Highfield Lodge Holiday Home. Both corrections are addressed in the Addendum to Jane Shearer's Written Representation.

ORAL REPRESENTATION

East Pye Solar — EN0110014 | Open Floor Hearing

Speaker: [REDACTED] Stuart Shearer — Interested Party

Property: [REDACTED]

PINS Reference: [REDACTED]

Duration: Approximately 3 minutes

Good afternoon, members of the Examining Authority.

My name is Stuart Shearer. I live at [REDACTED] — part of a Grade II listed residential cluster alongside Church View Barn and [REDACTED], immediately next to St Mary's Church, Grade II* listed, and the ruins of St Martin's Church, Grade II listed.

Under the *Barnwell Manor* judgment, the law requires you to give considerable importance and weight to harm to the settings of these listed buildings. The National Planning Policy Framework requires clear and convincing justification for any such harm. That justification has not been provided.

Site 8 sits 1.2 miles to our east. Its 4.5 metre tracker panels will be highly visible from the historic footpaths around our homes and churches within minutes of our doorsteps.

Two Serious Errors

The developer's assessment contains two serious errors.

First — in Appendix 7.4, the visual receptor on our ridge is listed as a commercial holiday lodge called Highfield Lodge Holiday Home. It does not exist. The property is a permanent residential home — Highfield House — sitting within our heritage cluster. Their own masterplan maps

then place it off Highfield Road in Brooke, over a mile away. The result is that the most sensitive residential and heritage receptor near Site 8 has been erased from the visual assessment entirely.

Second — the developer claims visual impact on Hawes Green is insignificant, yet elsewhere admits that glimpses and glimmers of the arrays will be visible from the footpaths of a Grade II* listed church. That is a direct contradiction. An admission of a glimpse is an admission of an unmitigated line of sight. Table 7.4 lists twenty-one assessed viewpoints for Sites 7 and 8. Hawes Green does not appear in a single one.

The Screening Does Not Work

The proposed screening fails on two counts. Valley-bottom hedges at thirty metres above sea level cannot screen panels on rising ground reaching forty-two metres, viewed from our ridge at thirty-eight metres. And the deciduous woodland relied upon is bare for six months every year.

Three Requests

I request three things.

One — the Applicant corrects both Highfield errors and reassesses the visual impact on our cluster.

Two — a verified topographical cross-section is produced from St Mary's Church path to Site 8 to prove the screening mathematics.

Three — an Accompanied Site Inspection from Hawes Green.

To Summarise What This Developer Has Actually Done

They misidentified a permanent family home on our road as a holiday lodge in a statutory document.

They then placed that same property in the wrong location on their own maps.

They acknowledged glimpses from a Grade II starred churchyard and called the impact insignificant.

They proposed valley-bottom hedges to screen a ridge-top community and called it adequate mitigation.

And they have not conducted a single Residential Visual Amenity Assessment from the most sensitive heritage cluster near Site 8.

That is not an adequate basis for consenting a forty-year industrial installation in one of Norfolk's most significant Conservation Areas.

Please reject Site 8. Thank you.

Registration Desk Reference — hand this in on arrival

EN0110014 — East Pye Solar — Open Floor Hearing

Speaker: [REDACTED] Stuart Shearer — Interested Party

Property: [REDACTED]

PINS Reference: [Insert your reference number]

Documents referenced:

- ES Chapter 7 (Landscape and Visual): Ref 6.1.7
- ES Appendix 7.4 (Visual Baseline): Ref 6.3.7.4 — Section 2.9, Table 2.17: 'Highfield Lodge Holiday Home'
- Table 7.4 (Visual Receptors): within Chapter 7
- ES Chapter 4 (Scheme parameters): Ref 6.1.4

Legal authority: Barnwell Manor Wind Energy Ltd v East Northamptonshire DC [2014]

Policy: National Planning Policy Framework (NPPF) — clear and convincing justification test
NPS EN-3 — Renewable Energy Infrastructure

RESPONSE TO EXAM/9.1

Applicant's Draft Itinerary for the Accompanied Site Inspection

East Pye Solar — Planning Inspectorate Reference EN0110014

To: The Examining Authority, The Planning Inspectorate

Submitted by: Stuart and Jane Shearer — Interested Parties

Property: [REDACTED]

Interested Party Reference: [REDACTED]

Date: 4th October 2026

Responds to: EXAM/9.1 — Applicant's Draft Itinerary for the Accompanied Site Inspection (2 October 2026)

Subject: Response to EXAM/9.1 — Request to Include Hawes Green Heritage Cluster and Market Lane in the Accompanied Site Inspection Itinerary for Site 8

Dear Examining Authority,

We write as registered Interested Parties to respond to EXAM/9.1 — the Applicant's Draft Itinerary for the Accompanied Site Inspection, submitted on 2 October 2026. We request that the Examining Authority requires three additional locations to be added to the ASI itinerary in relation to Site 8, and that the Applicant's proposed exclusion of the Shotesham Conservation Area footpaths is reconsidered.

The Hawes Green heritage cluster and St Mary's Church footpath are entirely absent from the Applicant's proposed ASI itinerary, despite being the closest Grade II* heritage cluster to Site 8 and the subject of formal Written Representations raising material assessment failures.

1. The Hawes Green Heritage Cluster is Absent from the Itinerary

We have reviewed EXAM/9.1 in full. Neither Hawes Green, [REDACTED], St Mary's Church (Grade II*, List Entry 1050642), nor St Martin's Church (Grade II, List Entry 1152468) appears anywhere in the Applicant's proposed or considered ASI locations. Our properties and the heritage cluster we have raised throughout this examination are entirely absent from a document that purports to identify locations relevant to Interested Party representations and likely significant environmental effects.

This is particularly striking given that:

- We formally requested an Accompanied Site Inspection from Hawes Green and the St Mary's Church footpath in our oral representation delivered at the

Open Floor Hearing at Dunston Hall. That request is not acknowledged or addressed anywhere in EXAM/9.1.

- Our Written Representations raise material failures in the LVIA and RVAA for Site 8 in relation to the Hawes Green heritage cluster, including the complete absence of any viewpoint assessment from or toward St Mary's Church (Grade II*) and the pre-emptive exclusion of the heritage cluster from the RVAA study area.
- Site 8 is rated as the only solar site in the entire 1,100 hectare scheme assessed as High value, High susceptibility and High sensitivity by the Applicant's own assessment (Table 7.3, ES Chapter 7). The Examining Authority should see the most sensitive landscape site in the scheme from the perspective of the heritage cluster that the LVIA and RVAA have failed to properly assess.
- The nearest physical boundary of Sub-Site 8A along Market Lane is only approximately 820 metres from the Hawes Green heritage cluster as the crow flies — just 320 metres beyond the Applicant's own 500 metre RVAA study area threshold. The Examining Authority should stand at this proximity to understand the relationship between the proposed development and the heritage cluster.

2. South Norfolk Council's Shotesham Request Has Been Improperly Excluded

Table 2.2 of EXAM/9.1 records that South Norfolk District Council specifically requested a site visit to Shotesham FP16/FP17 and Baxters Lane (Sites 8A and 8B) to understand the relationship between the proposal and the approach to the Shotesham Conservation Area, including sequential views and visibility experienced by users of the public rights of way network.

The Applicant has proposed to EXCLUDE this location on the sole ground that it is publicly accessible and no specific accompanied-access requirement has been identified. This reasoning is flawed. Public accessibility is not a proper basis for excluding a location from an ASI. The purpose of an ASI is to allow the Examining Authority to understand the Scheme and its effects from relevant viewpoints — whether or not those viewpoints require private access is irrelevant to whether they should be visited. The Examining Authority's own unaccompanied site inspection cannot substitute for an accompanied inspection at a location where the panel can hear from affected residents and Interested Parties about what they are seeing.

We submit that the Applicant's exclusion of South Norfolk Council's Shotesham request is unreasonable and that the Examining Authority should require this location to be reinstated in the final itinerary.

3. Market Lane is Marked as 'Potentially Excluded' Without Justification

Table 2.3 of EXAM/9.1 records that Block East Pye Solar suggested Market Lane, Shotesham (including Market Lane Farm, Golden Owl Barn and Site 8 access area) as an ASI location. The Applicant has marked this as 'potentially excluded' on the grounds that it may overlap with the unaccompanied site inspection routes.

Market Lane is the western boundary of Sub-Site 8A — the closest physical element of Site 8 to the Hawes Green heritage cluster at approximately 820 metres. It is the location from which:

- The proposed panels along the western boundary of Sub-Site 8A would be most directly visible from Hawes Green
- The inter-visibility between the proposed panel location and St Mary's Church (Grade II*) can be most clearly demonstrated
- The topographical relationship between the valley floor at approximately 30 metres AOD and the Hawes Green ridge at approximately 38 metres AOD is most clearly experienced
- The inadequacy of the proposed 3 metre hedge screening — which reaches only 33 metres AOD — in screening panels visible from a ridge at 38 metres AOD is most clearly demonstrated

We submit that Market Lane should be confirmed as an included ASI location and that any overlap with the unaccompanied site inspection is not a proper basis for exclusion where material Interested Party representations specifically concern this location.

4. Three Specific Locations We Request Be Added to the ASI Itinerary

We formally request that the Examining Authority requires the following three locations to be added to the final ASI itinerary for Site 8:

Location A. St Mary's Church footpath, Shotesham St Mary — the historic footpath running east from St Mary's Church toward the Shotesham Beck Valley and the proposed Site 8 location. This is the footpath acknowledged in the Applicant's own documents as having views toward Site 8 ('glimpses' and 'glimmers'). An ASI from this location would allow the Examining Authority to assess: (a) the sequential and kinetic views experienced along the approach to a Grade II* listed church, as required by Historic England GPA3; (b) the inter-visibility between St Mary's Church and the proposed panel location; and (c) the effectiveness of the proposed deciduous woodland screening during both leafed and bare conditions. Public footpath — no accompanied access required.

Location B. Hawes Green lane and [REDACTED] curtilage, Shotesham St Mary — the approach route to the heritage cluster and the curtilage of the Grade II listed Property. An ASI from this location would allow the Examining Authority to assess: (a) the domestic visual amenity of a Grade II listed residential receptor 820 metres from Site 8; (b) the absence of any RVAA assessment for a property only 320 metres beyond the Applicant's own 500 metre study area threshold; and (c) the historic rural setting of the heritage cluster that constitutes the immediate approach to St Mary's Church (Grade II*). Access by invitation of the landowners — we confirm our agreement to provide access.

Location C. Market Lane western boundary of Sub-Site 8A, Shotesham — the closest physical element of Site 8 to the Hawes Green heritage cluster at

approximately 820 metres. An ASI from this location would allow the Examining Authority to assess: (a) the direct inter-visibility between the proposed panel location and St Mary's Church (Grade II*) and the Hawes Green heritage cluster; (b) the topographical relationship between the valley floor at approximately 30 metres AOD where panels would be located and the Hawes Green ridge at approximately 38 metres AOD; and (c) the effectiveness of the proposed 3 metre hedgerow screening — which reaches only 33 metres AOD at this location — in screening panels visible from a heritage cluster at 38 metres AOD. Public highway — no accompanied access required.

5. The Case for an ASI at These Locations

We submit that the three locations above are essential for the Examining Authority to properly understand the matters raised in our Written Representations. The Applicant's LVIA and RVAA have failed to assess the visual impact on the Hawes Green heritage cluster. No viewpoint assessment has been conducted from or toward St Mary's Church (Grade II*). The RVAA has pre-emptively concluded there is a low likelihood of significant visual effects at this location without any site-specific assessment. An ASI from these three locations would allow the Examining Authority to reach its own conclusion about the visual relationship between Site 8 and the heritage cluster — a conclusion that the Applicant's environmental assessment has failed to provide.

We note that Historic England, in their Section 56 Relevant Representation (EN0110014-000340), has raised concerns about cumulative heritage impacts and landscape sequences in the vicinity of Site 8. An ASI at St Mary's Church footpath and Hawes Green would directly inform the Examining Authority's understanding of those concerns.

We also note that the Examining Authority's own unaccompanied site inspection record (EV1-001) does not record a visit to Hawes Green, St Mary's Church footpath, or Market Lane. These locations have not previously been visited by the panel.

6. Summary of Requests

We respectfully request that the Examining Authority:

- (a) Requires Location A (St Mary's Church footpath), Location B (Hawes Green and [REDACTED] curtilage) and Location C (Market Lane, Sub-Site 8A western boundary) to be added to the final ASI itinerary for Site 8
- (b) Reinstates South Norfolk Council's suggested location at Shotesham FP16/FP17 and Baxters Lane (Sites 8A and 8B), noting that public accessibility is not a proper basis for exclusion from an ASI
- (c) Confirms Market Lane as an included rather than potentially excluded location, noting that overlap with the USI routes is not a proper basis for

exclusion where material Interested Party representations specifically concern this location

- (d) Invites us as Interested Parties to attend the ASI at Locations A, B and C so that we may assist the Examining Authority's understanding of the heritage cluster and the visual relationship with Site 8 from our own perspective as residents of a Grade II listed property within the Shotesham Conservation Area

We are available to facilitate access to [REDACTED] and the Hawes Green curtilage (Location B) at whatever date and time is convenient for the Examining Authority during the week commencing 16 November 2026 as indicated in the Rule 6 letter.

Stuart & Jane Shearer

[REDACTED]

[REDACTED]

[REDACTED]

4th October 2026

Signed

Stuart Shearer

[REDACTED]

Jane Shearer

[REDACTED]