



Norfolk County Council

Open Floor Hearing 1: Note of oral submission

East Pye Solar (EN0110014)

Deadline 1 – 6 October 2026

Open Floor Hearing 1

Dunston Hall, Norwich

15 September 2026

Speaking notes for [REDACTED] (as delivered)

Good afternoon,

I am [REDACTED], Cabinet Member for Business, Skills and Agriculture at Norfolk County Council.

I am speaking today on behalf of the County Council in our roles as Highway Authority and Lead Local Flood Authority, which falls within my department, and as a democratically elected authority representing communities across Norfolk.

The County Council's position is clear. We object to the East Pye Solar proposal because of serious concerns about the loss of high-quality agricultural land, and the cumulative impacts of major infrastructure across this part of Norfolk in particular, and a number of unresolved issues affecting local communities, our environment, and statutory services.

At the same time, our objection should not be mistaken for an unwillingness to engage constructively. We will continue working with the applicant throughout the examination process to seek improvements and secure the strongest possible mitigation where impacts cannot be avoided.

At the heart of our concerns is the sheer scale and duration of this proposal.

East Pye Solar would occupy around 2,700 acres of agricultural land from Great Moulton to Seething. The project is expected to operate for 60 years.

We hear the term "temporary" used frequently in relation to solar development. However, a 60-year operational period is not temporary in the way local residents or farming businesses understand that term. It represents several generations of a farming family. It represents the majority of a person's lifetime. It represents a fundamental and long-lasting change to the landscape and character of this area.

A particularly important issue is the loss of high-quality agricultural land. The applicant's own figures identify 68.4 per cent of the site as Best and Most Versatile agricultural land.

The County Council believes the implications of removing such a significant area of productive farmland from agricultural use deserves substantial weight. This is not simply a local issue. It relates to food production, agricultural resilience, and the

long-term viability of farming businesses that contribute greatly to Norfolk's economy and identity.

Our concerns are amplified when this scheme is viewed in its wider context.

East Pye Solar is not an isolated development. Alongside proposals such as The Drovers Solar Farm, High Grove Solar Farm, and other solar projects across Norfolk, more than 13,000 acres of agricultural land are potentially affected.

At the same time, communities in South Norfolk are already experiencing the effects of other nationally significant infrastructure projects, such as the Hornsea Project Three grid works and the Norwich to Tilbury transmission project, both in the South Norfolk area.

The issue is not simply the existence of individual developments. It is the concentration, overlap, and interaction of impacts. Communities experience these projects cumulatively, not as separate chapters in different planning applications. The examination must therefore give genuine and rigorous consideration to the cumulative effects on residents and businesses.

There are also specific local consequences that illustrate our wider concerns.

At Great Moulton, the chosen National Grid substation location would bring a substantial new substation and up to four pylons closer to the village. The County Council previously supported the more southerly option because it would have consolidated infrastructure further away from residents and reduced the spread of visual and construction impacts.

As Highway Authority, we remain unable to support the current construction traffic strategy for Sites 7 to 10 because significant highway constraints and mitigation requirements remain unresolved. Construction traffic must use roads capable of accommodating it safely, and wherever possible should rely on internal haul routes and cable corridors rather than creating avoidable impacts on rural communities.

As Lead Local Flood Authority, we also remain concerned that the application does not yet demonstrate, through clear and consistent evidence, that surface water can be managed without increasing flood risk either on-site or elsewhere. This is a fundamental requirement that must be resolved before any consent is considered.

Finally, we are concerned about the longer-term effects on landscape character, public rights of way, and community wellbeing. Local people value these places not only for how they look, but for how they contribute to their quality of life.

In closing, Norfolk County Council asks the Examining Authority to ensure that the cumulative case for this development is examined rigorously and that any mitigation or compensation measures are clear, enforceable, and effective.

The transition to energy security is important and necessary. But that transition should not require host communities, productive farmland, and local infrastructure to bear avoidable or poorly mitigated harm.

If this project is ultimately to be consented, the applicant must be held to a high standard, and impacts should be avoided wherever possible.

Thank you.



Norfolk County Council

Preliminary meeting post-hearing submission

East Pye Solar (EN0110014)

Deadline 1 – 6 October 2026

Table 1: NCC's post hearing summary of oral submissions at the preliminary meeting

Issue	NCC comment
1 Welcome and introduction	Norfolk County Council (NCC) was represented by [REDACTED], Nationally Significant Infrastructure Projects Team Leader, supported by [REDACTED] NSIP Project Manager and [REDACTED], Senior Strategic Planner.
2 ExA's remarks about the examination process	CAH and OFH3 Locations: Discussion was held regarding the venue choice for the Compulsory Acquisition Hearing (CAH) and Open Floor Hearing (OFH) 3 in w/c 16 November. The applicant raised issue that the larger conference room at Dunston Hall used for the first set of hearings is unavailable for the November hearings. A smaller room with a maximum capacity of 90 is available but the Examining Authority held concern the space would not have suitable capacity. A number of alternatives were discussed including The Space, Norwich City Football Club and The Showground. NCC raised concerns with The Space due to limited parking facilities. NCC suggested The Showground although it was noted there are no heating facilities making it unsuitable. NCC stated they are happy to defer to Block East Pye Solar and local communities their preference for venue locations. The Examining Authority requested Norfolk County Council speak with the applicant to discuss alternative venue options. The County Council agreed to action with the applicant offline. NCC made no further submissions in relation to agenda item 2.
3 Initial Assessment of Principal Issues	NCC did not raise any issues at this agenda item
4 Draft examination timetable	ASI: The County Council is willing to provide officers for an accompanied inspection where access or explanation would assist. Relevant locations should illustrate traffic constraints and vulnerable users, flood and drainage conditions, the proposed National Grid substation near Great Moulton, public rights of way and landscape experience, ecological features, and cumulative infrastructure effects. NCC suggested and agreed to coordinate with South Norfolk District Council attendance at Accompanied Site Inspections. NCC suggested they are happy to either attend or defer attendance to South Norfolk District Council depending on the agenda of ASI, once known. NCC made no further submissions in relation to agenda item 4.
5 Procedural decisions taken by the ExA	Examination documents: Discussion was held on accessibility of examination documents and difficulty accessing certain maps which require high internet speeds. NCC support these concerns held by local communities. Norfolk's library service is managed by NCC. NCC suggested hosting examination documents at Long Stratton library and can facilitate any conversations the applicant have with the library service.

Issue	NCC comment
	NCC made no further submissions in relation to agenda item 5.
6 Any other matters	NCC made no further submissions in relation to agenda item 6.



Norfolk County Council

Issue specific hearing 1 post-hearing summary

East Pye Solar (EN0110014)

Deadline 1 – 06 October 2026

Table 1: Norfolk County Council reference note for ISH1: scope of the proposed development, site selection and the draft Development Consent Order

Agenda item	County Council position and points to make
1 Welcome, introductions and arrangements	Norfolk County Council was represented by [REDACTED], Nationally Significant Infrastructure Projects Team Leader, supported by [REDACTED], NSIP Project Manager and [REDACTED], Senior Strategic Planner.
2 Site selection and alternatives	No representation was made by NCC on agenda item 2.
3 Scope of the proposed development	Proposed National Grid Substation/DCO controls: NCC raised a query regarding the applicant's explanation of compulsory acquisition powers. The National Grid substation is part of the authorised development. On NCC's understanding, the fact that (in a situation where an alternative connection is agreed with National Grid) the authorised substation may not necessary for the solar farm doesn't mean that land for the authorised substation can't be acquired using compulsory acquisition powers. This is because the compulsory acquisition test is whether the land is necessary to build the authorised development, not whether part of the authorised development is necessary for the overall project. As presently drafted, the DCO does not include any requirement saying that the National Grid substation element cannot be built (or that CA powers cannot be exercised) if an alternative National Grid substation is built elsewhere. Requirement 5: Clarification was sought regarding the draft DCO. It is understood that work number 4 would be added to work number 1, 2 and 3 for requiring detailed design approval in accordance with the parameters and approval by the Local Planning Authority (LPA). But NCC understood the applicant to be saying that works 5 and 6 would be subject only to compliance with the Design Principles, Parameters and Commitments document rather than LPA approval. The applicant explained that works 5 and 6 related to overhead cabling works. NCC seeks further engagement with the applicant to understand why this means it is appropriate to take a different approach for works 5 and 6 compared to the other works controlled by requirement 5. Design Parameters: In discussion on the proximity of panels to residential properties being taken on a case-by-case basis and the subsequent landscape effects and mitigation, NCC asked the applicant to clarify where in the control documents the property-by-property distances are secured.

4 Particular examination issues

Traffic and Transport: The preferred construction strategy should rely on internal haul routes from suitably sized roads with appropriate capacity for safe access wherever possible. Traffic should enter from roads capable of safely accommodating construction traffic and movements between sites should occur internally rather than along smaller rural roads and taking access for each site individually. Concerns remain with a number of locations, particularly sites 7-10.

Discussions with the applicant are continuing. Technical Highway officer support from NCC was not available at the hearing and as such no comment was made in response to questions regarding site access via The Krons, Hempnall. Since the hearing, NCC has been able to clarify that the use of the Krons has not been agreed with highway officer, as suggested by the applicant. It was initially considered to be favourable to the initial proposed route via Fairstead Lane. However, in July 2026 NCC informed the applicant that it considered The Krons to be unacceptable as an access route. The preferred access route is using a haul route along CRC8, East of Hempnall, via the B1332.

Flood Risk and Drainage: The Lead Local Flood Authority (LLFA) have submitted detailed comments, with the key concerns pertaining to inconsistencies between the Flood Risk Assessment and Environmental Statement chapters, insufficient detail regarding impermeable development platforms, access tracks and compounds and a lack of preliminary site-specific infiltration testing. There is uncertainty regarding where surface water would discharge, due to an inability to establish whether drainage would discharge to ground or watercourses and inability to conclude there would be no increase in off-site flood risk.

It is noted that in accordance with paragraph 5.8.40 of EN-1, where a Flood Risk Management Authority, of which the LLFA is one, continues to have concerns and objects on the grounds of flood risk, the Secretary of State can grant consent, but needs to be satisfied before doing so that all reasonable steps have been taken by the applicant and the authority to try to resolve concerns.

With regard to the worst case of no infiltration, policy requires the Secretary of State needs to be satisfied that the proposed drainage system complies with any national standards published by ministers, of which the drainage hierarchy forms part of this guidance. This requires infiltration to be prioritised above discharge into watercourses or other types of discharge. Thus, the drainage strategy having as a worst-case scenario the discharge to a non-infiltration solution conflicts with EN-1.

A further meeting was held between the applicant and the LLFA on October 1st, which was attended by senior officers as requested by the Examining Authority. Several matters are moving towards resolution, including the Environment Agency modelling anomaly, groundwater evidence and drainage allowances for inverter units, with both parties agreeing to keep the sequential test position under discussion for deadline 1 and reassess it by deadline 2. Disagreement remains (although NCC understand that the applicant is considering its

Agenda item	County Council position and points to make
5 Draft Development Consent Order	approach) on the requirement of site-specific infiltration testing and the level of detail in submitted maintenance information and flood-risk management across construction, operation and decommissioning. Cumulative Effects: Discussion was made on overarching points about the applicants approach to cumulative effects, to which NCC noted having no overarching comments to make. NCC's points on cumulative effects are more detailed about subject specific approaches, like the approach to Best and Most Versatile land and Secretary of State decisions. The applicants approach to dealing with Tasway and it not being needed to be considered as part of the cumulative assessment is agreed. NCC committed to provide comments on articles 8 to 16 of the draft DCO by deadline one. NCC's comments are as follows: Article 8 (Street works): In the absence of protective provisions for the benefit of the highway authority, NCC considers that the power to enter streets and carry out street works on the streets specified in Schedule 3 should be subject to the consent of the street authority (i.e. NCC). This principle applies equally to the powers in paragraph (1) of article 10 (Power to alter layout of streets) and in paragraph (a) and (b) of article 14 (Access to works). This is important because notwithstanding the undertaker having these powers, NCC would remain the street authority and the highway authority with the duties and liabilities associated with these statutory roles. It is vital that NCC maintain control over street works, alterations to street layouts and accesses to the highway. NCC is willing to engage in a dialogue with the applicant over the modification of these articles or the agreement of protective provisions. Article 11 (Construction and maintenance of altered streets): NCC has identified a need to take further legal advice on the effects and implications of article 11. NCC will provide further comments on article 11 if required in response to the next submitted version of the draft DCO. NCC understands that the applicant intends to submit an updated draft at deadline 1, providing an opportunity for NCC to provide comments at deadline 2. Article 12 (Temporary closure of streets and public rights of way): NCC considers that clarification is needed as to what might constitute a "reasonable time" for the purpose of paragraph (1) of article 12, which enables the undertaker to "temporarily close, prohibit the use of, restrict the use of, alter or divert any street or public right of way and may for <u>any reasonable time</u>— (a) divert the traffic or a class of traffic from the street or public right of way; (b) authorise the use of motor vehicles on classes of public rights of way where, notwithstanding the provisions of this article, there is otherwise no public right to use motor vehicles; and (c) subject to paragraph (2), prevent all persons from passing along the street or public right of way." [emphasis added]

Agenda item	County Council position and points to make
6 Other matters	No representation was made by NCC.

7 Actions and closing

Action Point 17: A meeting was held jointly between the Applicant and both local authorities on 28 September 2026 to discuss the level of detail and certainty provided by the Design Principles, Parameters and Commitments [\[APP-213\]](#) document, including the design and finishes of infrastructure, the interaction between the National Grid substation and landscape planting, fencing and other mitigation. The Councils agreed to provide some precedent examples of design principles used on other schemes for the Applicant to consider.

The legal controls for detailed design, including those applicable to the National Grid substation, are also being considered through ongoing discussions on Requirement 5 of the draft DCO, with further engagement between the parties' legal advisers proposed.

Ongoing dialogue will take place between the parties with further meetings scheduled in the next 2 weeks. NCC understands that updates relating to design matters will be set out in the Design Principles, Parameters and Commitments [\[APP-213\]](#) document at a later deadline as engagement continues.

Action Point 25: NCC has engaged with the Applicant regarding the type and design of fencing proposed within and surrounding the development. During discussions on 28 September 2026, NCC sought further clarification on the proposed fencing specifications, including the reference to non-reflective tones, and requested additional detail regarding the appearance and treatment of both security and acoustic fencing. NCC highlighted concerns regarding the potential landscape and visual impacts of fencing associated with the development and emphasised that fencing should be designed to be as unobtrusive as practicable. NCC also questioned the extent and distribution of higher-security fencing and suggested that opportunities should be explored to minimise its visual prominence.

NCC further discussed the potential role of landscaping and planting in softening the appearance of fencing where required. The Applicant advised that it would consider the comments raised and explore opportunities to provide additional detail and consider alternative approaches where appropriate.

NCC will continue to engage with the Applicant on the detailed design, appearance and landscaping of fencing through ongoing discussions.

Action Point 45: NCC has engaged with the Applicant regarding the scope of the proposed DCO Interrelationships Report, including the potential need to consider relevant infrastructure projects located

Agenda item	County Council position and points to make
	beyond the Norfolk administrative boundary. During discussions on 28 September 2026, NCC highlighted that projects in Suffolk with potential construction-related interactions should be considered where relevant, including strategic infrastructure projects that may have implications for cumulative effects, traffic movements or construction activity. NCC specifically noted that projects in Suffolk may warrant consideration and suggested reviewing potential interactions with the Sizewell C Construction Management Plan. The Applicant also noted suggestions that LionLink should be reviewed. NCC will continue to engage with the Applicant and relevant local authorities regarding the scope of the report and the projects that should be included.