

Summary of Written Representation

Interested Party: [REDACTED]

East Pye Solar – EN0110014

Word Count - 1963

AI assistance declaration

I used OpenAI's ChatGPT to assist with reviewing and organising documents and drafting this summary. I have reviewed and edited the text. It summarises my own representation, concerns and conclusions and is not independent expert evidence. I take responsibility for its content.

For Clarity when referring to either my home or the Property, the residence is [REDACTED] (please redact the address)

Overall position

I maintain my objection to East Pye Solar, particularly Site 5. My submission identifies incomplete receptor information, technical discrepancies and unanswered questions about effects on my family, the community and the historic and natural environment.

My garden is approximately [REDACTED], and my driveway lies between [REDACTED]. Construction and operation would affect our home, garden and access. Our concerns are also project wide: our work, journeys and use of local paths connect with the areas affected by the Scheme. A **60 year operational period** would shape the surroundings in which my children are growing up for approximately two generations.

This summary accompanies the detailed evidence and requests in my full representation and is only intended as a guide to that document.

1. Incomplete assessment of my home and Category 3 status

- The Applicant describes its general land referencing process but does not explain the property specific evidence, distances or physical effects considered when excluding my property from Category 3.
- The assessment should address the residential curtilage, garden and historic structures, rather than assume that distances to a dwelling represent every affected receptor.
- The acknowledged borehole omission and absence of a demonstrated individual wall assessment raise questions about the completeness of the information supporting that decision.

- My submission provides measurements and indicative noise calculations using the Applicant's stated information. These require a reasoned technical response.

I request: identification of the receptors, measurements and effects actually assessed; reconciliation with my evidence; and reconsideration of Category 3 status using complete information, with amendment of the Book of Reference where appropriate.

2. Private borehole and groundwater protection

- WAT-043 of [PDA-012] expressly acknowledges that the borehole at my home was absent from its dataset, despite previous notification. It is actively used for garden and vegetable-garden irrigation.
- The Applicant relies partly on geological assumptions proposed to be confirmed through post-consent investigation.
- The Environment Agency's [RR-0587], issue EA-036, challenges reliance on the Lowestoft Formation Diamicton as a protective barrier, identifying variability and potential contamination pathways.
- Risks include construction-related pollution and changes to groundwater movement, recharge, level or yield. Absence of identified pre-existing contamination does not resolve these concerns.

I request: verification of essential assumptions during the Examination; a borehole-specific assessment; baseline quality and supply information; monitoring, action thresholds, alternative supply arrangements appropriate to its existing use, and enforceable investigation and remediation.

3. Historic walled garden and vibration

- The freestanding walled garden is over 200 years old, with uncertain foundations and close proximity to construction activities and traffic.
- Its position falls within the assessment distances discussed in my submission, but an individual vibration assessment has not been demonstrated.
- General assumptions for modern buildings would not establish protection appropriate to this structure.

I request: an agreed structural and photographic condition survey; assessment of piling, compaction, traffic and abnormal-load effects; structure-specific limits; monitoring and stop-work thresholds; and secured conservation-appropriate repairs where construction-related damage occurs.

4. Construction noise and operational transformer hum

- Construction lasting at least two years could substantially affect enjoyment of the house and garden.
- NOI-002 of [PDA-012] contains no apparent separate substantive response in its response column. The Applicant should clarify its answer and identify the assessment for my home.
- Operational concerns include persistent or recurrent **low-frequency transformer hum**, especially during quiet evening and night-time conditions.
- Example equipment and monitoring location MP34 require evidence that they represent the proposed infrastructure, and conditions at my property.
- The assessment should address combined sources, tonal characteristics, outdoor amenity, favourable sound propagation and any operating restrictions relied upon.

I request: underlying monitoring and equipment data, representative predictions and enforceable limits, mitigation, commissioning checks and prompt corrective action. A complaints procedure alone does not establish protection while a problem is investigated.

5. Traffic baseline, forecasts and access safety

- Counts including vehicles turning off towards recycling facilities, Hall Farm businesses or Brick Kiln Lane could inflate the baseline at Site 5 and understate the percentage increase from construction.
- Survey dates, bypass-related disruption, seasonal agricultural traffic and changes in traffic-generating uses require explanation.
- Broad vehicle categories may conceal differences between existing traffic and the size and weight of proposed construction vehicles.
- Site 5 forecasts need supporting quantities, workforce assumptions and clarification of compound use, together with combined traffic from neighbouring sites and cable works.
- A23 and A24 must be assessed in relation to homes, the children's nursery, businesses and existing accesses. Leaving private accesses physically unchanged does not demonstrate safe interaction with additional movements.
- My use of verges to reach paths and neighbours requires consideration, including any widening or loss of pedestrian refuge.

I request: a location-specific baseline and forecast, access-specific safety assessment incorporating collision evidence, and binding arrangements for passing, turning, residential access and pedestrian connections.

6. Abnormal-load and internal-route discrepancies

- [APP-176] identifies transporters approximately **56.926m and 69.666m long**; A23 tracking in [APP-175] uses approximately **51.427m**. Widths also differ.
- The A24 drawing contains a **16.5m** annotation but a tracked vehicle profile of only **12.780 m**.
- [APP-174] and [APP-201] identify A24 as an AIL access, without corresponding tracking being identified in the material reviewed.
- Access drawings describe a **50 mph** limit, whereas the relevant road is subject to the national speed limit.
- The internal route from A23 to the substation, including the western stream crossing, remains unclear.

I request: reconciliation of vehicle specifications, tracking, visibility, land requirements and clearances; structural loading checks; and mapped internal routes and crossings. Associated drainage, heritage, tree, ecological, noise and vibration effects must be addressed. Later contractor surveys should not substitute for evidence essential to establishing feasibility.

7. Drainage, flooding and aquatic habitat

- The western watercourse, historic brick tunnel or culvert and downstream River Tas connections require verified mapping and assessment.
- Reliance on future vegetation and controlled discharge does not establish existing drainage condition, capacity or resilience during construction.
- Construction runoff, compaction, intense rainfall, blockage and potential transfer of risk to roads and neighbouring properties need specific consideration.
- [PDA-007] adopts a precautionary position on white-clawed crayfish, acknowledges dry survey conditions and confirms that earlier surveys assessed habitat suitability rather than targeted presence or absence.
- Low suitability within a ditch does not establish that it cannot convey pollutants or sediment to occupied downstream habitat.

I request: assessment of the complete connected drainage pathways, crossings and downstream receptors, with secured pollution controls, monitoring, maintenance and remedial responsibilities.

8. Why Site 5 and the 400kV substation are necessary

- National renewable energy need does not explain why this substantial infrastructure must occupy Site 5.

- I have not identified a clear comparison of alternative 400kV Project Substation locations within the Applicants documents.
- The Applicant should explain whether the change from Norwich Main to Great Moulton altered the requirement for the substation, its voltage or location.
- Site selection should be explained against the detailed agricultural, ecological, hydrological, heritage and residential evidence, including findings differing from initial assumptions.

I request: identification of alternatives actually studied, environmental comparisons and reasons for selection, together with the consequences of reducing or omitting Site 5. I recognise that this is not a general requirement to prove that the “best” site was chosen.

9. Agricultural quality, food production and resilience

- Site 5 is predominantly Grade 2 land. The Applicant should demonstrate how actual survey results influenced its retention.
- The submission’s indicative comparison places 829.1 hectares of BMV land within the main sites and BESS at approximately **2.2% of the estimated South Norfolk BMV resource**. This is not a verified percentage lost to arable production.
- The actual loss requires quantification, with the estimated district denominator and differing land uses explained.
- Possible sheep grazing is unsecured and does not establish equivalent replacement of existing arable production.
- Climate related yield variability reinforces the need to assess lost productive capacity and agricultural flexibility over 60 years.

I request: quantified land and production losses, transparent assumptions, consideration of resilience, and assessment without assuming optional grazing will occur.

10. Existing biodiversity and wildlife connections

- The whole of Site 5 is currently within **Countryside Stewardship**. RR-1995 also identifies a Climate Change Vulnerability Buffer, Woodland Core Area, Woodland Improvement Area and National Habitat Network Expansion Zone.
- Construction would interrupt ecological benefits already present. Later habitat gains cannot retrospectively replace lost breeding, feeding and shelter opportunities.

- Wildlife cannot simply be displaced for several years and assumed to return to a substantially altered landscape.
- Bat routes and colonies, bird habitats and unsurveyed ponds require location-specific assessment and protection.
- Observed deer routes cross Site 5 towards [REDACTED], Hall Farm and [REDACTED] land. Existing B1527 deer warning signs reinforce the need to examine displacement and road safety.

I request: evidence that habitat functions and safe connections will continue through construction and operation, with suitable alternatives where displacement is assumed, secured management, monitoring and corrective measures.

11. Historic landscape, screening and long-term change

- [AS-020] identifies **nine historic hedgerow sections** associated with a pre-1845 field system and records the [REDACTED] estate relationship.
- A broad twentieth-century agricultural classification does not adequately explain the significance of those surviving features.
- Retaining boundary lines does not necessarily preserve their setting or the relationships between historic features.
- New screening may conceal infrastructure while enclosing existing views and changing landscape character.
- The Applicant acknowledges some significant landscape effects remaining at Year 15; property-specific, winter, delayed-establishment and assessment-area effects require explanation.

I request: assessment of the surviving landscape as a connected whole, evidence of screening performance and consideration of lower heights, setbacks and alternative layouts.

12. Glint and glare and compatibility of mitigation

- The assessment should address repeated exposure along journeys through several Scheme sites.
- The Applicant should demonstrate whether modelled fixed and tracking panel locations cover the worst effects permitted at detailed design or require restrictions.
- [AS-025] relies on vegetation along Site 5, while [APP-175] identifies access visibility requirements and potential hedge removal.

- Access openings and vegetation-height restrictions must be incorporated into glare predictions.

I request: a combined screening, access and panel-layout plan demonstrating that the mitigation can work together, with necessary restrictions secured.

13. Duration, combined effects and deferred decisions

- 60 years represents approximately two generations; time limited consent does not establish brief or fully reversible effects.
- Decommissioning creates further disturbance, followed by recovery periods. Retained infrastructure and planting may prevent restoration of the present landscape.
- Residents experience noise, traffic, lighting, access disruption and landscape change together.
- Essential uncertainties should be resolved during the Examination, with clear limits on later design changes.

14. Accuracy and accessibility

- [PDA-012] associates RR-1995 with matters I did not raise, including a Site 8 response, and alters or omits important details.
- Duplicate references occur within SOI-001 and GLI-001. These reinforce checking concerns but do not alone invalidate substantive answers.
- The 968-page thematic format prevents some residents from independently locating their responses.
- Elderly neighbours should not depend on my digital assistance. Paper access must include substantive documents, not merely website notifications.

I request: corrected individual responses, precise supporting references, key documents physically available centrally, appropriate postal communication and a fair opportunity to respond.

Conclusion and action sought

I ask the Examining Authority to require complete receptor assessments, resolution of material discrepancies, an evidenced justification for Site 5, and compatible, enforceable safeguards and remedies.

The Scheme would affect my family's home and our wider community throughout much of our lives. I remain unpersuaded that its benefits justify the scale, concentration and duration of the harm proposed. **I ask the Examining Authority not to recommend consent in its present form.**

Written Representation Following Matters Raised at the Open Floor Hearing

East Pye Solar DCO – EN0110014

Interested Party: [REDACTED]

Relevant Representation Reference ID used by Applicant in PDA-012: RR-1995

For clarity and all references to my home or the property is regarding the address: [REDACTED] (Pls Redact address details)

Word Count - 20971

Artificial Intelligence Declaration

I am a private individual and not a planning, legal, environmental or technical specialist. The East Pye Solar application and Examination contain a very large number of lengthy and highly technical documents, the scale and complexity of which are difficult for an ordinary member of the public to review and understand without assistance.

I have therefore used **OpenAI's ChatGPT** as an assistance tool in preparing this representation. It has been used to help me summarise and understand relevant application and Examination documents, identify and cross-reference material relevant to the matters I have raised, organise my comments, and assist with drafting and improving the clarity of my written submission.

The information provided to the AI included relevant documents published as part of the East Pye Solar Examination, the Applicant's responses, my own Relevant Representation and supporting material prepared by local residents. AI has not been used as a substitute for professional expert evidence, nor do I present myself as having specialist expertise.

I have reviewed and edited the final representation, checked the matters relied upon against the source documents so far as I am reasonably able to do so, and the views, concerns and conclusions expressed are mine. **I take responsibility for the content of this submission**

I submit this written representation further to the matters I raised orally at Open Floor Hearing 1. It addresses three matters in particular that I raised at this:

1. The failure to identify the owners/occupiers of the above property which is my registered home as a **Category 3 interest**;
2. the omission of my **private borehole/water supply** from the Applicant's assessment dataset and the resulting uncertainty concerning contamination and groundwater effects; and
3. The absence of a specific assessment of **construction vibration effects upon the historic freestanding walled garden at my home**.

It is also my response to the Applicant's subsequent document **The Applicant's Response to Relevant Representations Part 5: By Theme [PDA-012]**, insofar as it responds to my Relevant Representation RR-1995. At this point I would like to raise my concerns about the method the Applicant has used to responded to my Relevant Representation (RR). My RR is very specific to my case and how the proposal will directly impact and affect myself, my family and my residence. The

Applicant has chosen to take a theme based approach to the responses thereby not addressing specific points and concerns raised, attributing phrasing to multiple RR's in a generalist form, attributing quoted text from RR's to multiple individuals (and not correctly), and there are instances where points are attributed to RR's completely incorrectly and in other cases RR's being assigned twice to the same point.

1. My home and the degree of exposure to Site 5

As I explained at the hearing, my home is immediately adjacent to Site 5a. My garden lies approximately **11 metres from the Order Limits**, and my driveway lies between proposed construction access points A23 and A24.

This is therefore not a case involving a property some considerable distance from the Scheme.

As the Applicant has stated multiple times that the final design will be secured at the detailed design stage after the DCO is granted and therefore claims a worst case scenario approach is used in their assessments of impact I will use the same methodology but apply the actual distances to my residential property's curtilage and structures. Using the Applicant's approach where the exact positioning in relation to my home is not yet secured I have had to measure and calculate the potential impact to my residence on the basis of the infrastructure being at the closest point marked on The Works Plan AS-003. As this is the DCO secured scaled document I used the Adobe PDF measurement tool and calculated the distances from the proposed infrastructure as marked on this scaled map to my property's curtilage as follows:

Order Limit: 11m

Works No.1, 1(d). 7 – 43m

Construction Compound – 278m

400kV Project Substation and associated buildings – 381m

Access point A23 – 160m

Access point A24 – 94m

Using these actual distances and the Applicant's methodology stated in APP-048 for calculating predicted sound levels and using the Applicant's stated Sound Pressure levels from those works I calculated the following results:

Works	Distance to my Residence	Sound Levels at this point (dB)	Sensitivity Classification as per Applicant's criteria (APP-048)
Solar Array Piling	43m	76.3	High
Temporary Compound Construction	278m	55.1	High
400kV Substation etc	381m	60.4	High
Construction of access point A23	160m	55.9	High
Construction of access point A24	94m	60.5	High

The Applicant in APP-048 also states that levels above 65dB(A) are deemed to be automatically classed as SOAEL (Significant Observed Adverse Effect Level) and that a predicted level greater than 6dB(A) more than the nearest recorded background level would then be classed as SOAEL. As can be seen from the table above, Solar Array Piling levels at my residential property automatically class as SOAEL and based on the Applicant's baseline measurements all the other activities are greater than 6dB above their recordings and therefore should also by the Applicant's methodology be classed as SOAEL.

The Applicant also states in APP-048 in 12.5.7

"To evaluate the potential impact of construction-related traffic noise, a Study Area has been established in accordance with the guidance provided in DMRB LA 111 (Ref 12-24). Specifically, Section 3.8 of the guidance states: 'A construction traffic study area shall be defined to include a 50m width from the kerb line of public roads'"

and

12.5.8 states that *“On this basis, a Study Area from the centre of roads of 50 m from defined construction routes on public roads has been adopted.”*

Despite the fact that my residential property and garden abut the proposed construction route for Site 5 and Sites 7A-E with my property entrance sitting between the proposed permanent access points A23 and A24 on this route, no recognition of this has been made by the Applicant.

The relevance of this is that they identify specific issues requiring a property specific response rather than reliance upon generalised Scheme wide conclusions. The Applicant stated that identification of potentially affected residential properties were identified from aerial photographs (APP-048). In a rural area where it is not possible to establish residential boundaries from an aerial photograph this is a major concern regarding the quality of their assessments and the accuracy.

2. Category 3 status

I remain concerned that I as an owner and occupier of the property identified above, I have not been identified as a Category 3 interest despite the evidence shown above.

Current Government DCO guidance makes clear that even where a person’s land is not being compulsorily acquired, applicants should be conscious of people who may later possess rights to make a relevant compensation claim as a result of **construction or operational effects**, expressly identifying Category 3 persons under section 57 of the Planning Act 2008.

The Applicant’s response does not answer the property specific question

East Pye Solar’s response to this issue under **CON-037 in PDA-012**

The summary records that respondents, including my Relevant Representation RR-1995, believe they should have been identified as Category 3 interests.

East Pye Solar responds that, in preparing the Book of Reference, it:

undertook a detailed assessment of all land interests that may be affected by the Scheme using land referencing investigations, environmental assessments and

other project information, and states that this was undertaken in accordance with the Planning Act 2008.

However, it does not explain **why my home specifically was excluded**.

There is no property specific explanation identifying:

- what effects at my home were considered;
- what distances were used;
- whether construction noise was considered;
- whether construction vibration was considered;
- whether artificial lighting was considered;
- whether construction traffic or other physical effects were considered;
- whether the known private borehole and the potential effects upon groundwater quality, level, yield and the existing use of that borehole were considered; or
- why, after considering those matters, East Pye Solar concluded that the owners/occupiers of this property did not satisfy the Category 3 test.

The response therefore describes the **process** said to have been followed but does not disclose the **reasoning or outcome of that process for this particular property**. With the Applicant already stating the reliance on aerial photography that cannot clearly show the lived boundaries of residents, the question has to be raised as to the accuracy of the Applicant's assessments and if all the potentially affected properties have been properly identified.

That distinction has become more important following East Pye Solar's own response to the borehole issue, discussed below, because East Pye Solar now expressly accepts that an important receptor at my home was **not contained within its assessment dataset**.

It is difficult to understand how the Applicant can rely upon its environmental assessments as part of the basis for excluding my home from Category 3 when it now accepts that those assessments did not contain complete baseline information concerning the property.

Requested response

I therefore ask the Applicant to provide the following property-specific information:

1. the precise basis upon which this property was assessed for Category 3 purposes;
2. each physical construction and operational effect considered;
3. the distances and receptor information used;
4. whether my borehole and historic walled garden formed part of that assessment; and
5. the reason why, notwithstanding the proximity and identified potential effects, the Applicant concluded that I as the owner did not fall within Category 3.

If that exercise has not previously been undertaken using complete and accurate information, I request that the Category 3 assessment for this property now be reconsidered and the Book of Reference amended where appropriate.

3. Private borehole / water supply

The property's borehole is an existing and actively used groundwater abstraction. For clarity, the property is connected to the mains water supply and the borehole is currently used for irrigation of the garden and vegetable garden. Its significance to this Examination is therefore not that it presently provides drinking water, but that it is a known groundwater receptor and existing property resource which the Applicant has expressly acknowledged was absent from its assessment dataset.

At the hearing I explained that my home has a private borehole located close to Site 5 which had not been included within the Applicant's assessment dataset despite me repeatedly informing the Applicant starting with my response to the Phase 2 consultation on 28th July 2025 which included a map clearly locating the 2 private water sources opposite site 5, mine and the one at [REDACTED] (also omitted from the dataset and is used by the residents as their only source of water).

In **WAT-043, in PDA-012**, East Pye Solar responds directly to my Relevant Representation (RR-1995) and other representations concerning private water supplies around Site 5.

East Pye Solar states that its assessment relied upon information from:

- the British Geological Survey;

- Environment Agency permitted abstractions; and
- private water supplies registered with South Norfolk Council.

Crucially, the Applicant then states:

“It is recognised that the Respondent’s borehole is not within the dataset.”

That is an important admission.

My borehole is on the British Geological Survey, the Applicant has just failed to recognise it.

The issue is therefore no longer simply a disagreement between myself and the Applicant over whether the borehole was considered. **The Applicant accepts that it was not in the dataset upon which its assessment was based.**

The Applicant’s proposed answer is post consent investigation.

The Applicant goes on to rely upon the geological conditions at Site 5. It states that the chalk is overlain by Diamicton, predominantly cohesive, which it says extends to more than 6 metres in Site 5. The Applicant acknowledges that the composition of Diamicton can vary but says it does not anticipate a laterally or vertically extensive groundwater body.

The Applicant then states:

“Nonetheless, ground investigation will be undertaken post consent to confirm the assumptions made.”

It concludes that risks to private water supplies have not been identified because it assumes that they abstract from chalk or crag beneath the Diamicton, and because ground investigation will subsequently be undertaken and used to inform detailed design.

That response does not resolve my concern. It identifies the problem.

The Environment Agency itself challenged the Applicant’s apparent reliance on the Diamicton as a protective low-permeability layer. In RR-0587, issue EA-036, the Agency expressly stated that the Lowestoft Formation Diamicton is “not an aquiclude”, is spatially variable, and may contain sand lenses and buried channels capable of transmitting contamination to the underlying Principal Aquifer. The Environment Agency specifically identified the proposed Project Substations at Sites 4, 5, 7 and 10 as areas of particular concern. Accordingly, the Applicant

cannot safely rely upon an assumed continuous cohesive Diamicton layer to discount groundwater pathways or risks to private water supplies at Site 5 without site-specific intrusive investigation and hydrogeological assessment

A **known domestic water receptor has been omitted from the baseline**, yet the conclusion of acceptability is based partly upon geological assumptions that The Applicant itself says require confirmation by **post consent ground investigation** and the Environmental Agency says are unsound.

The question for the Examination is therefore how the potential effects upon this known receptor can properly be understood before consent if the information necessary to verify the underlying assumptions will only be collected afterwards.

“No identified source of potential contamination” does not resolve the whole issue

The Applicant also states that no Sources of Potential Contamination capable of mobilisation by construction have been identified within Site 5.

That appears primarily to address **existing contamination in the ground** that might be mobilised by construction.

My concern is broader.

Construction itself may involve excavation, trenching, piling, fuel and oils, concrete/cementitious materials, machinery, soil disturbance, drainage alteration and other activities capable of creating pathways by which groundwater quality or groundwater movement may be affected.

Potential issues including sediment mobilisation, accidental pollution, alterations to groundwater recharge and changes to drainage pathways have not been addressed in the Applicant's assessments. This demonstrates why simply stating that no pre-existing contamination source has been identified does not necessarily address all potential effects upon my nearby domestic abstraction.

There is also a distinction between **contamination** and **interference with the supply itself**. Even in the absence of contamination, changes to groundwater movement, recharge, level or yield could potentially affect my private supply.

I therefore request that my borehole is treated expressly as a receptor before relevant works commence and that the following are secured:

- confirmation and mapping of its location;

- baseline water quality testing appropriate to its existing use, including its use for irrigation of the vegetable garden
- a borehole specific source pathway receptor assessment;
- baseline water quality testing before construction;
- appropriate baseline information regarding yield/water level where practicable;
- monitoring during relevant construction works;
- defined investigation and action thresholds;
- a procedure for providing an appropriate alternative water supply for the existing irrigation use if construction is reasonably suspected of adversely affecting the borehole; and
- an enforceable mechanism for investigation and remediation where a construction related effect is established.

Most importantly, I ask the Examining Authority to consider whether the principal hydrogeological assumptions concerning a **known but previously omitted domestic receptor** should be verified before consent rather than being left entirely to post consent ground investigation.

4. Construction vibration and the historic walled garden at the property

The third issue concerns a historic freestanding walled garden at the property.

As explained at the hearing, the wall that formed the walled garden is over **200 years old**, and is part of the historic [REDACTED] manor landscape. The Southern side lies approximately 25m at the Eastern point and 37m at Western point from the Proposed Construction traffic highway route, 35m at the Eastern point and 46m at Western point from the Order Limits. Using the Works Plan (AS-003) and Adobe PDF measuring tool, the Eastern point of the Southern wall is 68m from Works No1 and 1(d), the Western point of the Southern wall is 78m from Works No1 and 1(d). The Applicant has stated that piling for the Solar Array structures will be used (contained in Works No1).

	Distance to Order Limit	Distance to Construction traffic Public Road Route	Distance to No1 Works – Piling for Solar arrays
Western point of Southern Wall	46m	37m	68m
Eastern Point of Southern Wall	35m	25m	78m

As mentioned previously, the Applicant has not measured to the edge of our curtilage for any of their assessments. The Walled garden structure is clearly shown on many publicly available maps and is included on the Applicant's Works Plan (AS-003).

In APP-048 12.5.5 *"In relation to construction vibration impacts, DMRB LA 111 (Ref 12-24) advises in paragraph 3.29 in Note 1 that: 'A study area of 100m from the closest construction activity with the potential to generate vibration is normally sufficient to encompass vibration sensitive receptors.'*

In 12.5.6 the Applicant states *"On this basis, a Study Area of 100 m from vibration-generating construction activity has been adopted"*

Section 12.5.8 the Applicant states *"To evaluate the potential impact of construction-related traffic vibration, a Study Area has been established which includes areas within 50 m from defined construction routes on public roads, access tracks and haul routes has been adopted. This is based on professional judgement and impacts not being expected at distances beyond this."*

With the omission of my home, it is clear that the Applicant has not applied these parameters correctly.

The Historic Walled Garden main structure is over 3m tall. The Southern wall spans approximately 80m in an East-West direction so is approximately parallel with the Northern boundary of Site 5a with unknown foundations. Its age, form of construction and freestanding nature are the reasons for my concern that it would be more vulnerable to vibration than a modern building. With very few structures of the original [REDACTED] still surviving, this is a significant historic structure.

With the stated mode of fixing of the panels being pile driving, the need to assess the walled garden structure in its own right is reinforced.

5. The appropriate safeguard for the historic wall

I am concerned the increase in road traffic caused by the construction works on multiple sites being routed onto the road very close to the historic wall as well as extremely large AILs proposed for Site 5a will risk damaging it. The construction occurring in Site 5a directly opposite also poses a risk to this historic and vulnerable structure. In the first instance, protection of this structure is paramount and then my concern is that without a specific assessment and baseline record, the risk has not been demonstrated to be acceptable and any subsequent dispute over causation would be unnecessarily difficult.

I therefore request that the Walled Garden is assessed correctly for the impact of any potential vibration caused from any activities associated with this project and before any construction (including pre construction activities associated with any of the sites accessed along this stretch of the B1527), piling, compaction or other potentially significant vibration generating activity occurs in the vicinity of my home, there should be:

- an agreed photographic and structural condition survey of the full wall;
- identification and recording of all pre-existing cracks, movement, mortar loss and other defects;
- a structure-specific vibration risk assessment;
- consideration of appropriate limits having regard to the wall's age, construction and condition rather than simply applying assumptions for modern buildings;
- vibration monitoring during relevant nearby works;
- alert/action levels and an appropriate stop-work/investigation procedure; and
- a secured obligation to repair construction-related damage using conservation-appropriate methods and materials.

A pre-construction survey protects both myself and the Applicant because it establishes objective evidence of the wall's condition before work begins.

7. The three issues are connected

These matters should not be considered as isolated complaints.

The Category 3 decision depends in part upon identifying the physical effects that **might** affect a property.

Yet in relation to my home:

- The Applicant now accepts that the private borehole was absent from its dataset;
- The historic wall has not been demonstrated to have been assessed as an individual vibration sensitive structure;
- My property based on the Applicant's methodology and parameters has been omitted from the noise/vibration receptor assessment; and
- The Applicant's Category 3 response does not explain what property specific effects were actually considered.

There is therefore a common issue of **incomplete receptor identification**.

8. Matters I ask the Examining Authority to pursue

I respectfully request that the Examining Authority asks the Applicant to provide a clear response on the following matters:

1. **Category 3:** Apply the Category 3 assessment specifically to my home, identify the effects and evidence considered, and explain why the property has not been included. If incomplete receptor information was previously used, reconsider the decision.
2. **Borehole:** Explain how the Examination can rely upon a conclusion of no material risk when East Pye Solar expressly accepts that the borehole at my home was absent from its dataset and relevant geological assumptions are not proposed to be confirmed until post-consent ground investigation.
3. **Water protection:** Secure a property specific baseline, assessment, monitoring and contingency regime for my private water supply.
4. **Historic wall:** Confirm whether the wall has ever been individually assessed for construction vibration. If not, require a pre-construction condition survey, structure-specific vibration assessment and monitoring/repair regime.

5. **NOI-002:** Clarify the Applicant's intended substantive response to RR-1995 under NOI-002, since no Applicant response is apparent in the relevant entry in PDA-012.

9. Further matters in RR-1995 which remain unanswered

The preceding sections address the three property specific matters raised at the Open Floor Hearing. I also wish to pursue the other concerns in my submitted Relevant Representation [RR-1995] where the Applicant's response does not answer the particular point raised, or only answers part of it.

In the sections which follow, I refer to The Applicant's Response to Relevant Representations Part 5: By Theme by its Examination Library reference [PDA-012]. CON, TRA, WAT, NOI and similar identifiers identify individual response rows within that document. Page references are to the p numbers, rather than the PDF viewer page count.

I recognise that the Applicant has provided substantive explanations on a number of matters. I do not suggest that a response is absent merely because I disagree with its conclusion. My concern is where a general explanation or reference to a technical chapter does not demonstrate how the particular circumstances identified in RR-1995 have been addressed.

10. Construction and operational noise at my home

The missing construction noise response

In RR-1995 I raised the sustained effect of a construction period expected to last at least two years, with extended working hours and frequent vehicle movements close to my home. This concern includes the effect on the use and enjoyment of the house and garden, in addition to the separate risk to the historic wall addressed above.

NOI-002 in [PDA-012], p 860–862, records concerns about construction noise and vibration and includes RR-1995. However, the Applicant's Response column is blank across that entry, before NOI-003 begins on p 863. It appears the Applicant has grouped the response to NOI-002 along with the response to NOI-001 (Respondents expressed concern regarding the impact of noise and vibration in general.)

The presence of general construction controls elsewhere does not explain the Applicant's answer to the particular concern recorded under NOI-002. I ask for

that response to be provided expressly, with the assessment for my home identified.

The operational noise reply contains assumptions which still require explanation

Under NOI-024, p 880–881 of [PDA-012], the Applicant states that operational rating levels around Site 5 are predicted to be below background without mitigation. It says that low frequency transformer noise has been assessed, that MP34 is representative, and that intermittent gunshots or commercial sounds are unlikely materially to influence the measured background level. It also acknowledges that example equipment data have been used because final equipment has not been selected.

I acknowledge those answers. My remaining concern is whether the example equipment and monitoring location reliably represent the worst effects which could occur at my home. The explanation concerning intermittent sound does not show the underlying monitoring records, the frequency and duration of commercial activity, or a comparison between MP34 and the sound environment at my property during quieter periods. It also fails to address the difference between noise perception in rural and non rural environments.

NOI-003 and NOI-013 also rely upon the noise assessment [APP-048] and the Outline Operational Environmental Management Plan [APP-197]. The commitment that non-BESS operational rating levels will not exceed background is relevant, but its application depends upon the background level selected, the combined sources assessed and the treatment of tonal or other distinctive characteristics.

RR-1995 is not confined to temporary construction effects. My concern about noise at my home also extends to the long term change in the acoustic environment caused by the proposed substation, in particular the continuous or recurrent low frequency “hum” associated with transformers. That is an important distinction in a quiet rural location, where an acoustically distinctive sound may remain perceptible even where its numerical level is relatively low.

This is a recognised characteristic of electricity infrastructure. The current National Policy Statement for Electricity Networks Infrastructure (EN-5) Paragraph 2.9.39 states that transformers “generate low frequency hum” and that whether this can be heard outside a substation depends upon factors including

transformer type and the level of attenuation provided. EN-5 also requires the decision maker to be satisfied that appropriate assessment methodologies have been used and that appropriate mitigation has been considered and adopted.

The Environment Agency's guidance on the application of BS 4142 is also relevant to the Applicant's reliance upon background sound levels and MP34. It states that background sound levels can vary significantly at different times and locations and that more than one monitoring survey or assessment may therefore be necessary. It specifically requires consideration of worst case scenarios, including periods of low background sound and favourable propagation conditions such as a receptor being downwind of the source. The associated Method Implementation Document further states that monitoring locations should be representative of the assessment location and, where an equivalent or surrogate location is used, the reason why it is equivalent should be justified.

That guidance is particularly pertinent to my home. The Applicant's response that MP34 is "representative" does not, without the underlying evidence, demonstrate that it represents the quieter periods actually experienced at my home, particularly during the evening and night when rural background levels may fall and the masking effect of traffic, commercial activity or other intermittent sounds may disappear. Nor does the explanation concerning gunshots or commercial activity identify the frequency or duration of those events sufficiently to demonstrate that they have not materially influenced the background level adopted for assessment.

The Environment Agency's *Method implementation document (MID) for BS 4142*, which expressly applies in England, provides relevant regulatory guidance on the proper implementation of BS 4142. Although directed principally to environmental permitting and regulatory monitoring, it is instructive as to good practice when considering matters such as the representativeness of monitoring locations, background sound levels, acoustic characteristics and context. In particular, where a surrogate monitoring location is relied upon, the basis on which it is considered representative requires justification of equivalent locations, and consideration of audible tonal or "hum" characteristics in context. It also makes clear that calculated methods are intended to replicate human perception and that observations can take precedence where calculations do not reflect what is actually heard. The question is therefore not simply whether the predicted numerical rating level is below the selected background level, but whether a persistent transformer tone would remain audible and distinctive at my home in its rural acoustic setting.

The reliance on example equipment is also relevant. Until the final transformer specification is known, the Applicant has not demonstrated that the assumed sound power levels, frequency spectrum and tonal characteristics represent the reasonable worst case for the plant ultimately installed. This is particularly important for low frequency transformer noise because EN-5 recognises that audibility depends on the type of transformer and the attenuation provided. The Applicant has stated that the 400kV Project Substation will be either air insulated or gas insulated. No selection criteria as to which will be chosen to be installed has been provided. Therefore, it is unclear as to what weighting the noise implications for my home, the PRow's in close proximity to my home and the surrounding countryside my family and I experience will be given in that fundamental design decision.

Accordingly, the responses under NOI-024, NOI-003 and NOI-013 do not yet answer the substance of the concern raised in RR-1995. I respectfully request that the Applicant provide a receptor-specific assessment for my home which:

1. identifies the distance and propagation relationship between my home and each relevant transformer or other continuous operational source;
2. provides the underlying MP34 monitoring data and explains why MP34 is representative of my home during the quietest relevant daytime, evening and night time periods;
3. identifies the measured background levels after excluding, or appropriately treating, intermittent gunshots, commercial activity and other non representative sound;
4. provides the assumed transformer sound power levels and frequency spectrum, including the dominant low frequency components and any tonal corrections applied under BS 4142;
5. demonstrates that the example plant represents a reasonable worst case, or secures appropriate maximum sound power and tonal limits for the final equipment;
6. predicts the specific and rating levels at my home for quiet background and favourable propagation conditions, rather than relying only on a general Site 5 conclusion; and

- explains what mitigation would be provided if the transformer hum remains clearly audible or distinctive at my home notwithstanding compliance with the numerical background criterion.

Without that information, the statement that operational rating levels are predicted to be below background does not demonstrate that the particular effect identified in RR-1995—an enduring and perceptible industrial hum introduced into the rural sound environment of my home, has been adequately assessed or addressed.

Whilst my original representation referred to mitigation across the wider Scheme and included reference to the BESS mitigation, my representation was not about the noise associated with the BESS at all as it is focused on Site 5 but the Applicant has assigned my Relevant Representation to NOI-005 which is wholly focused on noise produced from the BESS leading me to believe that the Applicant has not correctly identified the context the BESS was mentioned in my Relevant Representation and therefore incorrectly included into a theme not raised by it. The unresolved Site 5 questions concern the evidence supporting the Applicant's prediction and the controls which will keep the final plant within it.

Requested response to overall Noise in addition to transformer noise related points raised and unanswered

I therefore ask the Applicant to provide:

- its substantive response to NOI-002, identifying the predicted construction noise at my home, the assessment positions used, the activities which could occur together, their duration, working hours and the mitigation relied upon;
- the MP34 monitoring records and an explanation of why those records represent daytime, evening and night-time background sound at my home;
- the source data and frequency spectra used for the Site 5 transformers, inverters, tracker motors and other relevant plant, and the evidence that the permitted final equipment and layout will remain within the assessed noise envelope;

- the predicted combined operational rating level at my home, including the character corrections applied, and the precise provisions securing compliance; and
- the arrangements for checking compliance, investigating complaints and taking corrective action, including who is responsible and when action must be taken.

11. Reliability of the traffic baseline and Site 5 forecasts

In RR-1995 I identified several specific concerns about the traffic data. These included the difference between the stated September survey period and the counts undertaken from 1 to 7 November 2024, the effects of Long Stratton Bypass construction, sugar beet traffic, the position of the counters, the classification of heavy vehicles and the anticipated closure of Morningthorpe Recycling Centre.

I also specifically raised the location of the traffic count. The Applicant relies on the baseline to argue that the predicted construction traffic would not materially increase overall traffic volumes on the B1527. My concern is that the baseline applied at the Site 5 access points may include vehicles which turn off to the Norfolk County Council-run recycling centre, Richardson's Recycling at the old gravel pit, Hall Farm industrial units and self-storage, or the commercial businesses on Brick Kiln Lane, and therefore do not continue past those access points. If those movements have not been deducted or otherwise accounted for, the baseline used for the affected section of the B1527 could be inflated.

Using an inflated baseline would make the predicted additional construction traffic appear smaller as a percentage of existing traffic. It could therefore understate the proportional increase experienced by residents and businesses opposite and adjoining Site 5. The relevant comparison is between the existing traffic actually passing the Site 5 access points and the combined additional construction traffic for Sites 5 and 7 using that stretch of the B1527. The Applicant should demonstrate that its conclusion is based on that local

comparison, with the relevant routing and any overlap in construction periods explained, rather than on a count which includes traffic turning off elsewhere.

TRA-039, p 724 of [PDA-012], states that the bypass was taken into account and that the assessment uses forecast future baseline conditions. It refers to the transport chapter [APP-047] and Transport Assessment [APP-174 to APP-177].

That is an answer to the general question of whether the Applicant knew about the bypass. It does not reconcile the survey dates or show how the other matters were dealt with such as the experience of residents of vehicles using alternative roads to the A140 as “rat runs” to avoid the noted long delays and diversions that were experienced due to the bypass construction. A forecast baseline can only answer those concerns if the adjustments and assumptions used to produce it are explained.

I am also concerned about the distinction between the number of vehicles and their size. My original representation questioned whether the vehicle categories used in the baseline provide an appropriate comparison with the large construction vehicles proposed as it grouped any vehicle over 3.5t as an HGV. I ask the Applicant to explain the actual classification system and its relevance, rather than assuming that all vehicles counted within one broad category have the same effect on this road.

The construction forecasts also require a direct response

RR-1995 questioned the basis for the Site 5 construction forecasts, given the proposed 400 kV substation, compound, access roads, cabling, solar arrays and welfare facilities. It also questioned the use of comparator schemes which themselves relied upon forecasts, and apparent differences between Site 5 and smaller solar-only sites.

TRA-034, p 720 of [PDA-012], states that simultaneous construction was assumed and that works would in practice be staggered. This explains one programme assumption. It does not provide the quantities, workforce

assumptions or comparator data from which the Site 5 vehicle numbers were calculated.

Requested response

I therefore ask the Applicant to provide:

1. the dates and locations of each survey used for the Site 5 routes, and an explanation of the September and November discrepancy;
2. a plan showing the counter locations and the routes to the Norfolk County Council run recycling centre, Richardson's Recycling at the old gravel pit, Hall Farm industrial units and self-storage, and the commercial businesses on Brick Kiln Lane; the adjustments made for vehicles which do not pass the Site 5, CRC7 and Site 7 access points; and a comparison of the resulting local baseline with the combined construction traffic for Sites 5, 7 and CRC7 using that stretch of the B1527, showing both the additional vehicle numbers, more accurately reflective weight and size of vehicle and the

percentage increase, including during any overlapping construction periods;

3. the underlying vehicle counts and classifications, including the distinction between vehicles of different sizes and weights;
4. the adjustments made for bypass works, seasonal agricultural traffic and known or anticipated changes in traffic-generating uses, including the recycling centre;
5. the calculation of Site 5 construction movements by activity and phase, including workforce travel and compound use, with the assumptions and comparator evidence identified; and
6. an explanation of how sensitive the predicted effects are to a lower future background flow or higher Site 5 construction demand than assumed.

If the Applicant considers that any of these matters would make no material difference, I ask it to show the calculation or evidence supporting that conclusion.

12. Site 5 access safety and the ability to reach local footpaths

RR-1995 raised the relationship between the proposed accesses, existing private accesses, the nursery and businesses on the B1527, the road's limited width and the absence of a continuous pedestrian footway. My driveway lies between A23 and A24. These are features of the particular stretch of road that I use every day.

TRA-038, p 723 of [PDA-012], acknowledges the visibility concerns near ES Motor Sports, Wheels4Less and Jack in the Box Children's Nursery. However, it says that the concern relates to existing highway conditions and that the Scheme does not alter the existing private access arrangements.

My concern is the effect of adding construction movements to those existing conditions. Leaving an existing access physically unchanged does not explain how its users will safely interact with additional HGVs and abnormal loads entering and leaving nearby Scheme accesses.

TRA-003 and TRA-034 rely upon the transport assessment and traffic management measures. A statement that delivery booking and designated routes will be used does not show whether two large vehicles can pass at constrained

locations, what happens when a resident enters or leaves a driveway, or where a pedestrian can stand safely.

Footpaths must be safely accessible as well as kept open

Under REC-007, p 651–652 of [PDA-012], the Applicant states that no permanent public right of way closures are proposed and describes signage, alternative routing, marshals and reduced speeds during construction.

RR-1995 raised a different practical difficulty as well: residents need to move between paths and neighbouring properties along the B1527. Where there is no footway, existing verges may provide the only available refuge. My representation questioned the effect of any widening on those verges and my ability to reach the paths on foot. Reopening a path after works does not resolve its safe connection to the surrounding road network during construction.

Requested response

I therefore ask the Applicant to provide:

- an access specific assessment for A23 and A24 showing the interaction with my home, the nursery and neighbouring business accesses, including visibility, turning movements and the collision information considered;
- a plan identifying the constrained carriageway sections, available passing space, pedestrian refuges and any widening or verge loss;
- the arrangements which will maintain safe access to my home and safe pedestrian connections between the affected public rights of way throughout construction; and
- the measures which are binding, the times at which they will apply and the party responsible for implementing them.

The response relies upon [APP-047], [APP-174 to APP-177], the Outline Construction Traffic Management Plan [APP-201] and the Outline Public Rights of Way Protection and Management Plan [APP-203]. TRA-003, p 686, cites APP-043 when referring to Chapter 11. Elsewhere the response identifies that chapter as APP-047 and APP-043 as Landscape and Visual. I ask the Applicant to confirm the correct reference and the precise evidence relied upon.

13. Abnormal indivisible loads and the feasibility of the Site 5 route

RR-1995 identified an apparent inconsistency between a 52 metre vehicle used in Site 5 access tracking and a 69.6 metre vehicle referred to in specialist transport information. This was a specific example of inconsistent technical information within the application. In the Applicant's transport document APP-176, p28 the report by Wynns Transport Specialists state that for Site 5a & 5b the transporter arrangements required are:

“5 bed 5 trailer as shown in drawing number 24-1275.TC03

16 axle girder frame as shown in drawing number 24-1275.TC05

20 axle girder frame as shown in drawing number 24-1275.TC06”

On p34 of APP-176 drawing 24-1275.TC05 clearly shows the 16 axle vehicle with a length of 56.926m whilst on p35 of APP-176 drawing 24-1275.TC06 shows the 20 axle vehicle at a length of 69.666m and an overall transport width of 5.161m. The Applicant's Indicative Junction Layout produced by Stantec in document APP-175 p33 show the calculations for the sweep into Site 5 at proposed access point A23 are based on a vehicle 51.427m in length with an overall width of 5.000m. This is a significant discrepancy between the Specialist Transport company Wynn who have stated what vehicles would be needed for the 400kV substation construction and Stantec who have produced the Site Access Drawings, Visibility Splays and Swept-path Analysis. They do not appear to be in agreement with which data they should be working to. Also, their Site Access Drawings, Visibility Splays and Swept-path Analysis for access point A24 (APP-175 p31) states on the main drawing a figure of 16.5m but the vehicles used to demonstrate the sweep (green hashed) states it is a LG Rigid Vehicle with Trailer. This is supported with the Vehicle Profile (left hand side) which states that it is based on LG Rigid Vehicle with Trailer at 12.780m long. This calculation of accessibility appears to be in contradiction to section 3.1.4 APP-201 Outline Construction Transport Management Plan which states that

“Concept access design drawings for each access have been prepared based on the legal maximum sized vehicle (16.5m articulated HGV). Access drawings, visibility splays and swept path analysis is detailed in ES Volume 3, Appendix 11.1 - Transport Assessment [EN0110014/APP/6.3.11.1]”

There appears to be no analysis of vehicles greater than 12.780m long and no AIL vehicles accessing A24 contrary to APP-174 p31 Under the heading of AIL Routing it states

“Sub-Sites 5A-B – north or southbound on A140, eastbound on B1527, south onto A23 or A24. Depart on same route in reverse”

and again in document APP-201 p20. Under section 6.2.2 Routes for Abnormal Load Movements

“AIL movements will utilise the Strategic Road Network (SRN) to reach the Sites and CRC temporary construction compounds only using the LRN for the final part of the journey. The anticipated routes on the LRN are as follows:” “Sub-Sites 5A-B – north or southbound on A140, eastbound on B1527, south onto A23 or A24. Depart on same route in reverse;”

These two documents clearly state that A24 is considered as an AIL access point into Site 5 but there is currently no transport assessment of access for these size of vehicles at this point which would demonstrate that with the proposed Order Limit which includes DCO rights over properties on the opposite side of the road to Site 5 would be sufficient to allow safe passage into/out of Site 5 for anything greater than 12.8m long and 2.45m wide.

This report also incorrectly states the speed limit at this point along the B1527 as 50mph when it is actually currently at the National Speed limit (60mph).

The Stantec report also works on the figures for the much smaller vehicles accessing A24 and the only point of access into site 5 for the AILs as being A23. It does not include any details, nor have I seen in any of the other applicant's documents the route from A23 to the construction site of the 400kV substation which is especially concerning as it would involve crossing the open stream that runs through the Western section of Site 5 running under [REDACTED] through the brick tunnel and down to the Chalk Stream River Tas.

TRA-013 and TRA-014, p 701–702 of [PDA-012], state that abnormal load routes and vehicle tracking have been assessed. The Applicant disagrees that the routes cannot be traversed, but says specialist contractors will undertake detailed planning and, under TRA-013, route surveys before movements take place.

The response does not reconcile the differences in lengths of vehicles that the Applicant's own specialist state are required and their other specialist states the access assessments are based on.

The issue also extends beyond a vehicle's swept path. RR-1995 identifies historic drainage infrastructure beneath the B1527 and raises the effects of heavy construction traffic upon it. A route which can accommodate a vehicle geometrically may still require structural checks or works to roads, verges, structures and nearby features. With A23 being proposed on one side of the stream in the west which would avoid taking loads directly over the historic bricked tunnel, there is no information how the vehicles, which would now appear to include all vehicles into Site 5a greater than 12.8m long (due to the assessment on access point A24) will be routed over the stream and the assessments conducted on impact that route will have on the hydrology, archaeology, protected trees, noise and vibration that will occur in the construction of the route and operation.

Requested response

I therefore ask the Applicant to:

- reconcile the 52 metre and 69.6 metre figures and identify the maximum overall length, width, axle configuration, weight and swept envelope for Site 5 deliveries;
- identify the exact drawing and vehicle specification used for each relevant access and constrained route section;
- identify the bridge and culvert assessments, clearance requirements and any physical alterations on which route feasibility depends; and
- explain what would happen if later route surveys identify a constraint requiring works or effects outside those already assessed.

The documents cited by the Applicant are [APP-047], [APP-174 to APP-177], [APP-201], [APP-046] and [APP-165 to APP-168]. I ask for the relevant drawings, tables and conclusions within them.

I therefore ask the Applicant to:

- reconcile the transporter requirements identified by Wynns in [APP-176], page 28 and drawings 24-1275.TC03, 24-1275.TC05 and 24-1275.TC06, with the vehicles used in Stantec's access assessments. In particular, explain how the 51.427 metre long, 5.000 metre wide vehicle assessed at A23 in [APP-175], page 33, demonstrates access for the 56.926 metre and 69.666 metre transporters identified in [APP-176], including the latter's stated overall width of 5.161 metres;
- identify the maximum overall length, width, height, laden weight, axle configuration, axle loads and swept envelope required for deliveries to Sites 5A and 5B, and demonstrate that the access assessments cover each controlling vehicle configuration;
- reconcile the 16.5 metre annotation on the A24 drawing in [APP-175], page 31, with the 12.780 metre LG Rigid Vehicle with Trailer shown in its vehicle profile and swept-path analysis, and explain how that assessment fulfils the stated design basis of a 16.5 metre articulated HGV in [APP-201], section 3.1.4;
- confirm whether A24 is intended to accommodate abnormal indivisible loads, as expressly identified in [APP-174], page 31, and [APP-201], section 6.2.2. If so, provide the access design and swept-path assessment for the actual transporters required. If not, explain and correct the conflicting routing information and identify the consequences of directing those deliveries through A23;
- demonstrate that the required vehicles can safely enter and leave each intended access within the available highway space, proposed Order Limits and land rights sought. This should identify vehicle overhang, clearance requirements, any use of neighbouring land or accesses, and the implications for the nursery and business access opposite A24, adjacent premises, verges and pedestrians;
- correct or explain the use of a 50 mph speed limit for this section of the B1527, which is subject to the national speed limit of 60 mph for cars, and demonstrate whether the visibility and access-safety assessments remain valid using the correct speed limit and appropriate evidence of actual vehicle speeds;

- provide a mapped internal route from A23 and, where relevant, A24 to the proposed 400 kV substation and other delivery locations within Site 5. Identify which vehicles would use each route, where they would cross the western stream, and the location, design and load capacity of every proposed temporary or permanent crossing;
- identify the condition surveys, structural assessments and loading checks for the historic brick tunnel, culverts, bridges and other drainage structures potentially affected by the delivery routes. Explain whether avoiding the tunnel at the highway entrance would nevertheless introduce loading or other effects elsewhere along the connected drainage system;
- identify the assessment of the construction and use of the internal haul route and stream crossing, including effects on drainage, flood risk, the downstream River Tas, archaeology, protected trees, and noise and vibration at nearby properties. Specify any excavation, strengthening, vegetation removal or other works required, together with the mitigation and commitments securing their implementation; and
- explain what would happen if subsequent contractor planning or route surveys show that the required vehicles cannot use the assessed accesses or internal routes without additional land, works or environmental effects. Matters essential to demonstrating route feasibility should be resolved during the Examination, rather than left to later surveys without an explanation of the consequences.

For each response, I ask the Applicant to identify the precise Examination Library document, page, drawing, revision and assessment relied upon. A general statement that abnormal-load routes have been assessed does not resolve the discrepancies between the specified transporters, the access drawings and the stated routing through A23 or A24.

14. The historic culvert and the wider Site 5 drainage system

The omission of my borehole is addressed in section 3 above. RR-1995 also raised a separate concern about the identification, capacity and condition of the western watercourse and historic brick culvert or tunnel beneath the B1527 and former [REDACTED] estate, its connection to the River Tas and local experience of flooding.

WAT-020, p 562 of [PDA-012], records the concern about the old brick culvert and the watercourse's route. The Applicant's answer relies upon grass and wildflower cover slowing runoff, together with a lined drainage system for the 400 kV Project Substation and controlled discharge at QBAR. Detailed drainage is left to Requirement 11.

I acknowledge those proposed measures. The response does not confirm whether the culvert has been traced, surveyed for condition and capacity, included in the hydraulic assessment or checked for construction loading. The benefits attributed to established vegetation also do not explain the position during soil stripping, compaction and construction before that vegetation is established.

The downstream pathway remains relevant

WAT-005, p 547 of [PDA-012], states that hydrological connectivity to water receptors within a 2 kilometre radius has been assessed. RR-1995 described a longer watercourse route to the River Tas. I ask the Applicant to explain how the full connected pathway and relevant downstream receptors have been included, rather than assuming that the stated radius necessarily covers the issue.

WAT-006, WAT-011 and WAT-002 refer to compaction controls, maintenance or replacement of drainage, pollution measures and conclusions of no significant adverse water effects. These are relevant commitments, but the response does not show the Site 5 calculations and existing drainage information on which their effectiveness depends.

WAT-018, p 558, has been assigned to my representation but it concerns Site 8 which was not mentioned in my representation. I can only draw the conclusion that my representation was assigned to this by the Applicant in error.

Requested response

I therefore ask the Applicant to provide:

- a verified map of the Site 5 watercourses, field drainage, historic culvert and downstream connections, identifying how local evidence has been checked;
- the culvert's condition, capacity and structural loading assessment, including any protection needed for HGVs, abnormal loads and nearby construction;

- the construction and operational runoff assumptions, including soil compaction, temporary drainage, intense rainfall, blockage and the period before ground cover is established;
- identification of the downstream receptors and the modelling or other evidence demonstrating that risk is not transferred to roads or properties outside the Order Limits; and
- the inspection, maintenance, access and remedial responsibilities for drainage throughout construction and operation.

The relevant documents cited in the response are Water Environment [APP-045], the Water Framework Directive Assessment [APP-163], the Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018], and the outline management plans [APP-196], [APP-197], [APP-198] and [APP-204].

15. Why Site 5 remains necessary within the selected layout

In RR-1995 I accepted the importance of renewable energy while questioning the scale, dispersed layout and environmental consequences of this particular proposal. I asked why Site 5 had to be included and why the claimed efficiency and grid benefits justified the harm in this location.

APL-001, NEE-001, NEE-007, NEE-008, ALT-002 and ALT-004 in [PDA-012] set out the national need case, the importance of the grid opportunity, the site selection process and the Applicant's view of the planning balance. LAN-003, p 363, explains that the design seeks to maximise generation from the available land and grid connection while reducing environmental effects.

I recognise that national need and the ability to connect are material benefits. NEE-005 also explains the Applicant's position on regional capacity and NESO prioritisation. My remaining concern does not depend upon treating a regional capacity range as a prohibition on further solar development.

The unresolved question is how the particular contribution of Site 5 was weighed against its particular constraints. The response explains why the Applicant sought a large scheme and why separate parcels can operate as one project. It does not show what would be lost by omitting or reducing Site 5, or the environmental comparison with a different substation location or layout.

The decision should reflect the detailed evidence now available

RR-1995 identified the actual agricultural quality of Site 5, its habitat connections, historic landscape and drainage constraints. ALT-002 refers to the Site Selection Assessment [APP-215], Design Approach Document [APP-212] and Reasonable Alternatives and Design Evolution [APP-041]. I ask where those documents show how the decision to retain Site 5 was reviewed against the detailed evidence, particularly where that evidence differs from an earlier desktop assumption.

The need for the 400 kV Project Substation and the alternative locations considered

I have not been able to identify documentation demonstrating which alternative locations were considered for the 400 kV Project Substation proposed at Site 5. A description of the selection of solar-generation land does not, by itself, explain the selection of the location for this substantial item of infrastructure.

I recognise that the planning framework does not impose a general requirement to demonstrate that the proposed development represents the best possible option. EN-1, paragraph 4.3.9, makes that distinction. However, paragraph 4.3.15 requires the Environmental Statement to explain the reasonable alternatives studied and the principal reasons for the choice made. Schedule 4, paragraph 2 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 similarly requires information about reasonable alternatives studied, including a comparison of their environmental effects. My request is for the Applicant to identify the actual assessment undertaken for the 400 kV Project Substation, rather than simply refer to the wider Scheme's site-selection process.

The change from the previously proposed connection at Norwich Main to the proposed National Grid connection point at Great Moulton also requires a clear explanation. Did that change introduce or materially alter the requirement for a 400 kV Project Substation at Site 5? In particular, was the increased transmission distance a reason for selecting this voltage and locating the substation here, or would a 400 kV Project Substation at Site 5 have been required even if the connection had remained at Norwich Main?

I do not assume that distance alone determines the required voltage or substation location. I ask the Applicant to distinguish between the technical requirement to transform the Scheme's electricity to the connection voltage and the separate

decision to locate that equipment at Site 5. Demonstrating a need for a 400 kV connection does not, without further explanation, demonstrate why the Project Substation must occupy this particular location.

Additional requested responses

I therefore also ask the Applicant to:

- confirm whether a 400 kV Project Substation at Site 5 would still have been required under the Norwich Main connection arrangement. If so, explain why; if not, identify what changed and the evidence supporting the revised design;
- explain the respective roles of connection voltage, transmission distance, electrical losses, capacity, engineering constraints and commercial considerations in selecting the Site 5 arrangement;
- identify the alternative locations actually considered for the 400 kV Project Substation, including whether locations elsewhere within the Scheme or nearer the proposed connection point were examined, and provide the reasons for selecting or rejecting each option;
- identify the environmental comparison undertaken, including effects on nearby homes, landscape, heritage, agricultural land, ecology, groundwater, drainage and construction access, together with any differences in cable-route impacts;
- state expressly if no alternative substation locations were studied, explain why, and distinguish that position from an assessment which considered alternatives and rejected them; and
- provide the precise Examination Library references, pages, plans and comparison tables recording these decisions, including the relevant passages in Reasonable Alternatives and Design Evolution [APP-041], the Design Approach Document [APP-212] and the Site Selection Assessment [APP-215], where applicable.

A general reference to national renewable-energy need or the availability of a grid connection does not answer why this particular substation is required at Site 5 or where the assessment of alternative locations can be examined.

Requested response

I therefore ask the Applicant to identify:

- the contribution of Site 5 to generation and the consequences of realistic reductions in its extent or infrastructure;
- the alternative Site 5 layouts and substation locations considered, the constraints compared and the reasons for rejecting less harmful options;
- when the selection was reviewed following the detailed agricultural, ecological, hydrological and heritage findings; and
- the specific adverse effects at Site 5 which were weighed against its contribution, including effects which remain after mitigation.

A clear comparison is needed to explain the conclusion in the Planning Statement [APP-209]. Repeating the national need case in the Statement of Need [APP-206] does not provide that comparison.

16. Agricultural land quality and the claim of continuing agricultural use

RR-1995 referred to the Applicant's survey figures of 37.7% Grade 2 and 41.0% Grade 3a across Sites 1–10 and the BESS, and to the predominance of Grade 2 land at Site 5. My concern was whether the selection of this land had been properly justified once its actual quality was known.

SOI-001, p802–804 of [PDA-012], states that land within the Order Limits was considered likely to be among the lower-quality land in the wider area using predictive BMV mapping. It says that alternatives and reductions were considered and relies upon the Site Selection Assessment [APP-215], Design Approach Document [APP-212], Soils and Agricultural Land [APP-051] and Outline Soil Resource Management Plan [APP-204].

The response does not identify the particular review which reconciled that initial prediction with the detailed survey results. I recognise that development on BMV land is not prohibited. My question concerns the evidence for using this particular

high-quality land and the options considered to reduce the loss of its productive use.

The proportion of South Norfolk's BMV land affected

The assessment should distinguish the proportion of all agricultural land affected from the proportion of South Norfolk's best and most versatile agricultural resource affected.

Table 15.6 of [APP-051], p19, identifies 397.4 hectares of Grade 2 land and 431.7 hectares of Grade 3a land across Sites 1–10 and the BESS: a combined 829.1 hectares of BMV land.

Table 15.16 and paragraph 15.8.111 of [APP-051], p61–62, provide district figures and an estimation method. Applying the Applicant's assumption that 40% of undifferentiated Grade 3 land is Grade 3a gives an estimated South Norfolk BMV resource of approximately 38,015 hectares. On that basis, the 829.1 hectares represents approximately 2.2%.

This is an indicative comparison, not a verified percentage removed from arable production. The district denominator is estimated, while the Scheme figure includes land with different proposed uses. I ask the Applicant to identify the actual area becoming unavailable for arable cultivation and provide the corresponding district-level percentage, with its assumptions and limitations clearly stated.

Possible sheep grazing is not equivalent to the existing arable use

SOI-002, p816–817 of [PDA-012], answers the wider food-security concern by reference to national evidence and the proportion of agricultural land affected. SOI-004, p827, states that management beneath the arrays could include sheep grazing, with the detailed landscape and ecological plan to follow.

That wording does not establish that grazing will occur, the area available, the level of production achievable or the obligation securing it.

This is predominantly an arable farming area, rather than an area principally associated with sheep farming. The Applicant itself recognises the wider area's predominantly arable character in [APP-051], paragraph 15.8.109. The

possibility of introducing sheep beneath solar panels does not demonstrate that the existing agricultural production would be maintained.

I recognise that sheep grazing can produce food. However, grazing and arable cultivation are different agricultural uses. The possibility of grazing does not retain the ability to grow the existing range of crops or establish equivalent productive output. Any claimed reduction in agricultural harm should therefore be supported by a comparison between the present farming use and the production realistically achievable within the proposed development.

That comparison should account for the land occupied by infrastructure, practical restrictions on farming, the area actually available for grazing and the management arrangements required. It should also distinguish grazing undertaken primarily to control vegetation from a commercially viable agricultural enterprise.

An unsecured possibility should not be treated as assured agricultural production when assessing the loss of the existing arable use over the proposed 60-year operational period.

Climate change and the resilience of agricultural production

The loss of arable capacity should also be considered against increasing uncertainty in agricultural yields. The heat and dry conditions experienced in 2025 and 2026 reinforce the need to examine the resilience of food production over the Scheme's operational lifetime.

Agriculture and Horticulture Development Board (AHDB) reported considerable variation in yields during the 2025 harvest. Its final 2026 harvest report, updated on 25 September 2026 using information collected to 21 September, describes disappointing and highly variable yields following limited rainfall since spring. It identifies soil type and moisture retention among the factors affecting performance. The Met Office has also identified recent hot, dry conditions as consistent with projected increases in drought severity under climate change.

I do not suggest that every crop or farm experienced the same reduction, or that these reports establish losses on the application land. My concern is that a comparison based principally on the percentage of agricultural land occupied does not explain the implications of removing productive arable capacity while

output from the remaining land is vulnerable to increasingly difficult growing conditions.

Poor yields in a dry year do not, by themselves, demonstrate that land has little long-term agricultural value. Retaining land capable of supporting different crops and rotations preserves options for adapting to changing conditions. I ask how that flexibility has been valued in the assessment.

Possible sheep grazing does not resolve this concern. The Applicant has not demonstrated that it would replace the existing arable output or provide equivalent resilience. Any comparison should also explain the implications of heat and drought for the proposed grazing system, including forage availability, water supply and reliance on supplementary feed.

I recognise that renewable energy contributes to addressing climate change. My question is how that benefit has been weighed alongside the consequences of this particular land-use choice for agricultural adaptation and food-production resilience.

Requested response

I therefore ask the Applicant to:

- identify the review of site selection and alternatives undertaken using the actual agricultural survey results, and explain how those results affected the decision to retain BMV land within the Scheme;
- quantify the hectares of Grade 1, Grade 2 and Grade 3a land which would become unavailable for arable cultivation, distinguishing temporary

construction effects, occupation throughout the operational period and any permanent loss;

- express that area as a proportion of South Norfolk's BMV resource, explaining the source data, assumptions and uncertainty, and reconcile the result with the indicative comparison above;
- identify the existing agricultural uses, crop rotations and representative multi-year yields used to assess the loss of production;
- explain how climate-related yield variability and the value of retaining adaptable arable capacity have been considered over the proposed 60-year operational period;
- identify what agricultural production, if any, is secured during operation, particularly at Site 5, and provide the area available for grazing, anticipated stocking levels, practical management arrangements and the obligation securing that use;
- demonstrate the basis for any claim that grazing would offset the loss of arable production, including its likely output and resilience under plausible future growing conditions;
- assess the position if sheep grazing does not occur, rather than assume that an optional future use will be delivered; and
- explain the weight given to the loss of present productive use and agricultural flexibility in the planning balance, identifying the precise Examination Library documents, pages and assessment conclusions relied upon.

17. A time limited consent does not diminish 60 years of effects

In RR-1995 I challenged the description of a 60 year development as temporary. My concern was the duration of the change experienced by residents and the countryside: approximately two generations, during which people could grow up, raise families and spend most or all of their adult lives alongside the development.

SCH-002 and SCH-003 of [PDA-012], p224–226, explain that the Applicant seeks a time limited consent and anticipates decommissioning. They also state

that the Scheme's temporary nature has been reflected in the environmental assessments. However, they do not identify how my concern about the multi generational duration of the effects has been addressed.

I recognise that EN-3, paragraph 2.10.58, uses "temporary" to describe consent granted for a finite period. My objection is therefore to the use of that description without sufficient explanation of the duration and consequences of the development. It would be misleading to use the finite consent period to imply that the effects would be brief, readily remedied or necessarily of limited significance.

60 years of operational effects remain 60 years of effects, even if infrastructure is subsequently removed. Later restoration cannot return to residents the intervening decades of landscape enjoyment, tranquillity or agricultural use. The prospect of eventual removal is relevant, but should be weighed alongside the full duration of the harm.

Consent duration, physical removability and environmental reversibility are separate matters. The Applicant should explain which effects would cease upon removal, which would require a further recovery period and which could remain permanently. This is particularly important because its own response excludes the National Grid substation and connection infrastructure from the general decommissioning proposition.

Schedule 4, paragraph 5 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 requires the Environmental Statement to address long-term effects as well as permanent and temporary effects. A reference to the expiry of consent does not, by itself, demonstrate how the significance of effects lasting approximately two generations has been assessed.

Recovery after decommissioning and the lasting effects of mitigation planting

The end of the operational period would not necessarily mark the end of the environmental effects. Decommissioning would itself involve works, followed by a period during which disturbed soils, vegetation and habitats would need to recover. The Applicant should distinguish the date on which generation ceases, the completion of infrastructure removal and the point at which the proposed restoration outcomes would actually be achieved.

I am concerned that trees, hedgerows or other planting introduced as mitigation could need to be removed, cut back or disturbed to provide access for dismantling

and removing infrastructure. I do not assume that all planting would be affected. However, the Applicant should demonstrate how removal would be undertaken around mature planting, including the space required for vehicles, lifting equipment, temporary access and working areas.

If mitigation planting would be disturbed, the assessment should identify the resulting landscape and ecological effects and the time required for recovery or replacement planting to become effective. The retention of underground cables, as proposed, does not answer these questions concerning the removal of above ground infrastructure and the associated access requirements.

There is also a separate issue where mitigation planting is retained. New trees, hedgerows and screening belts would alter the existing open landscape and views. Removing solar panels and other infrastructure would not restore those views if the planting which enclosed them remained.

Screening the development and restoring the present landscape are therefore different outcomes. Planting may reduce views of infrastructure while itself producing a substantial and potentially permanent change in landscape character. That change should be assessed in its own right, including where the planting remains after the infrastructure it was intended to screen has been removed.

The Applicant's response under C&D-005 of [PDA-012] acknowledges that some habitat and biodiversity planting may remain and that subsequent land management would be a matter for the landowners. This leaves uncertainty over what landscape would actually exist after decommissioning. Returning land to its owner is not the same as restoring its former appearance, openness or use.

I therefore remain concerned that the description of the Scheme as temporary does not adequately explain the full period of disturbance, the subsequent

recovery period or the landscape changes which could endure beyond the operational life.

Additional requested response

I therefore ask the Applicant to:

- explain expressly how the 60 yr, multigenerational duration has been reflected in the assessment of effects on residents, landscape, heritage and agricultural use;
- identify every assessment conclusion in which anticipated decommissioning or the description “temporary” has reduced the assessed magnitude, significance or weight of an adverse effect, and explain the reasoning;
- explain why a 60 yr operational period is sought, compared with the typical 40 year period identified in EN-3, and whether the additional duration changes any assessment conclusion;
- identify the full period of disturbance, including construction, operation, decommissioning and any subsequent restoration or recovery, rather than refer only to the operational consent period;
- distinguish infrastructure to be removed, from infrastructure, foundations, planting or other changes which may remain, and identify the requirements securing removal and restoration; and
- demonstrate how the benefits of eventual restoration have been weighed against the effects experienced throughout the intervening decades.
- identify the anticipated duration of decommissioning and the subsequent recovery periods for soils, vegetation, habitats and landscape, explaining the evidence and assumptions used;
- show which mitigation trees, hedgerows and planting areas could be affected by removal works, including vehicle movements, lifting operations and temporary working areas;
- explain how retained planting would be protected, including its root systems, and how unavoidable damage or removal would be addressed;
- identify which planting would be retained permanently, which could be removed and who would determine and secure its future management;
- assess the landscape after decommissioning, including whether retained planting would prevent the restoration of existing open views and landscape character; and

- define measurable restoration outcomes, monitoring periods and corrective measures, rather than treat completion of infrastructure removal as proof that the area has recovered.

I ask that the Scheme be described clearly as a development with a proposed 60 year operational period, with its permanent elements and potentially lasting effects separately identified. The word “temporary” should not substitute for that explanation or diminish the weight given to long term harm.

18. Landscape effects screening and loss of tranquillity

RR-1995 raised the effect of the scale and height of the infrastructure, the loss of openness and long views, the limitations of replacement planting and the change in the character of the landscape experienced from homes and local routes.

LAN-004, LAN-005, LAN-006, LAN-007, LAN-009 and LAN-034 in [PDA-012] provide substantive responses. They identify the landscape assessment, design parameters and planting commitments. LAN-009, p 376–377, expressly acknowledges that some significant effects remain at Year 15. LAN-007 also recognises the long term change from agricultural land to an energy production landscape and its effects on tranquillity.

I do not therefore suggest that the Applicant has denied all landscape harm. My concern is whether the response demonstrates the effect at the particular places identified in RR-1995 and explains why further avoidance or reduction was not pursued.

Screening and a change in landscape character are different matters

New planting may screen some infrastructure while also enclosing views which are currently open. The Site 5 substation response under LAN-034, p 410, refers to existing vegetation and additional planting. It does not identify the view from my home, the performance of screening in winter or the period over which the relevant infrastructure would remain conspicuous.

LAN-006 confirms that maximum panel parameters were assessed. That does not explain whether lower panels, a different arrangement or greater separation at the most sensitive locations was considered, or why those options were rejected.

LAN-009 states that the landscape chapter does not consider lighting effects and points instead to the Lighting Strategy [APP-151] and management plans. I ask how the combined daytime and night-time change at nearby homes and paths is brought together, including the interaction between visibility, noise and lighting.

Requested response

I therefore ask the Applicant to identify the assessment entries and representative views for my home and the relevant Site 5 routes; show opening year, Year 15 and winter screening assumptions; explain the effect of delayed or unsuccessful planting; identify the lower height or greater setback options considered; and state the residual harm given weight in the planning balance.

The relevant documents cited in the replies include Landscape and Visual [APP-043], Landscape Assessment Tables [APP-120], the Public Right of Way Visual Amenity Assessment [APP-149], the Green Infrastructure Strategy [AS-005], the Outline Landscape and Ecological Management Plan [APP-199] and the Design Principles, Parameters and Commitments [APP-213].

19. Historic landscape character and the surviving [REDACTED] features

RR-1995 explained that the value of the local landscape arises from the relationship between historic field patterns, hedgerows, trees, rural lanes, former estates and settlements. It also identified the historic [REDACTED] drainage infrastructure as a feature requiring consideration. These concerns relate specifically to the landscape around Site 5 which I experience daily from my home and when travelling and walking locally.

CUL-001, p 591–592 of [PDA-012], refers to the assessment of heritage assets and design changes. CUL-005, p599, says that most fields within the Order Limits are twentieth century agricultural fields of limited significance, and that the change of use will not affect the legibility of field patterns or historic landscape character as a whole.

However, the Applicant's own Archaeological Desk Based Assessment contains more specific evidence about Site 5 which is not adequately addressed by that generalised response. In [AS-020], p69, paragraph 7.48 identifies **nine sections of hedgerow within Site 5** which meet the historic field system criterion. Paragraph 7.49 explains that these surviving boundaries form part of a field system “pre-dating the Inclosure Acts (taken as anything before 1845)” and

regards them as important under the Hedgerow Regulations 1997. Their locations are identified in Figure 32 in the same document.

The same assessment records the relationship with the [REDACTED]. Paragraphs 7.40–7.46, printed page 68 of [AS-020], describe the historic division between Morningthorpe and Fritton parishes and the mapping evidence for the western part of Site 5 forming part of the [REDACTED] including woodland, plantations and meadows. Paragraph 7.43 identifies subsequent removal of field boundaries to create larger fields.

I recognise that twentieth-century changes to farming and field size can explain the broad landscape classification. However, that classification does not mean that the surviving landscape originated entirely in the twentieth century or that its earlier features and relationships have ceased to matter. The Applicant's own evidence identifies surviving historic boundaries and an estate landscape beneath that broad description. Those features require a specific assessment of their significance and the effects of the proposed development upon them.

Retaining a hedgerow or boundary line on a plan does not, by itself, demonstrate that its landscape setting, historic relationships or contribution to local character will remain unaffected. Solar arrays, the 400kV Project Substation, fencing, access tracks and associated infrastructure would alter the land experienced on either side of those boundaries. Additional screening may obscure infrastructure, but could also change the visibility and understanding of the surviving field pattern and its relationship with surrounding historic features.

Paragraph 7.63, printed page 71 of [AS-020], addresses limited hedgerow removal and concludes that the pre-1845 field pattern would remain legible. That does not sufficiently explain the combined effects of the infrastructure and mitigation planting on the historic landscape as experienced around Site 5.

CUL-027, p 629 of [PDA-012], confirms consideration of [REDACTED] deserted medieval village and Hall and the identification of related medieval activity in Sub-Site 5a. This shows that [REDACTED] has not been wholly overlooked. However, it does not answer my particular concerns about the historic culvert or brick tunnel, its physical protection, or the relationship between the surviving drainage infrastructure and the wider estate landscape.

This again demonstrates the limitation of responding by theme rather than addressing the specific issues raised in RR-1995. A general conclusion about

agricultural fields across the Scheme does not answer my concerns about identifiable historic features immediately around my home. By absorbing those concerns into a Scheme wide description, the response understates the particular character and sensitivity of the area directly affecting me. It does not demonstrate that the local effects I identified have been assessed and answered on their own evidence.

Requested response

I therefore ask the Applicant to:

- respond specifically to the historic landscape concerns raised in RR-1995, explaining how the evidence relating to Site 5 informed its conclusions;
- reconcile its reliance on the 20th century agricultural classification with its identification of nine important historic hedgerow sections and surviving elements of the [REDACTED] landscape;
- identify those hedgerows on a plan showing the proposed infrastructure, accesses, removals and mitigation planting, and explain the effects on their historic relationships and landscape setting;
- explain why retaining boundary lines is considered sufficient to preserve historic landscape character despite the changes to the land between and around them;
- confirm whether the historic [REDACTED] culvert or brick tunnel has been recorded and assessed as a heritage feature, and identify measures protecting it from construction loading, vibration and alteration; and
- assess the combined effects of the development and its mitigation on the surviving historic landscape around Site 5, including the landscape experienced by nearby residents.

The relevant documents are Cultural Heritage [APP-046], the Heritage Statement [APP-165 to APP-168], Archaeological Desk-Based Assessment [AS-020 and AS-021], Evaluation Trenching Report [APP-172] and Archaeological Mitigation Strategy [APP-173]. I ask for the specific paragraphs, drawings and conclusions relied upon.

20. Existing ecological value and whether the habitat network will remain functional

Existing stewardship management and disruption during construction

In RR-1995, I identified that Site 5 is already managed through Countryside Stewardship to support biodiversity alongside agricultural production. I also identified its location within areas described as a Climate Change Vulnerability Buffer, Woodland Core Area, Woodland Improvement Area and National Habitat Network Expansion Zone. These references were raised in my representation as evidence of the site's existing ecological value and its role within a wider habitat network.

The whole of Site 5 is currently within Countryside Stewardship. My concern is therefore about the disruption of land already being positively managed to support wildlife, together with the effects on the habitat connections and opportunities for ecological improvement identified in RR-1995.

The Applicant's broad response in ECO-051 of [PDA-012] does not adequately explain how these particular matters were assessed at Site 5. It should identify the existing management commitments and the relevance of each mapped ecological area, explaining how construction and the permanent layout would affect their functions. General statements about agricultural land and future biodiversity gains do not answer that location specific concern.

Construction would interrupt the conditions under which wildlife currently feeds, breeds, shelters and moves through the site. Clearance, earthworks, vehicle movements, fencing, lighting and infrastructure installation could disturb, damage or destroy existing habitats and disrupt their use. Retaining individual hedgerows or providing buffers does not, by itself, demonstrate that the wider network would remain functional.

Wildlife cannot simply be displaced for a construction period lasting two years or more and then be assumed to return. Suitable feeding, breeding and sheltering habitat must remain available throughout that period, with safe connections between it. If the assessment relies on wildlife moving elsewhere, the Applicant should identify those locations and demonstrate that they provide suitable habitat and sufficient capacity.

Nor would wildlife be returning to the same landscape. Solar arrays, the 400kV Project Substation, fencing, access tracks and other infrastructure would substantially alter Site 5. Any assumption that existing species would return, or that replacement habitats would fulfil the same functions, requires evidence specific to those species and this location.

Predicted gains after new habitats establish do not, by themselves, answer the loss or interruption of existing benefits during construction. Habitat created later cannot retrospectively provide breeding, feeding or shelter opportunities lost in the intervening years. The assessment must address that interruption and the risk that existing wildlife populations or patterns of use would not recover.

By addressing this through a broad thematic response, the Applicant has not adequately answered the specific evidence in RR-1995 about existing stewardship management and the wider ecological network around my home. The following matters identify where evidence is needed to demonstrate that this network would remain functional throughout construction and within the altered operational landscape.

Bats and the existing connections between habitats

ECO-005, p456–458 of [PDA-012], acknowledges surrounding Barbastelle colonies and land within their core sustenance zones. It relies upon surveys, retained boundaries, buffers and habitat creation, and compares the proposed disturbance with existing agricultural operations.

My remaining concern is whether that comparison reflects the actual use and management of Site 5. The response does not identify the particular commuting and foraging routes relied upon, the combined effects of construction and lighting upon those routes, or how their function will be maintained while replacement or enhanced habitats establish.

Birds, ponds and aquatic habitat

ECO-004, p 452–453 of [PDA-012], explains that operational effects on breeding birds were scoped out generally, while skylark was assessed separately. I ask how the existing Site 5 territories and species raised in RR-1995 informed that approach and the conclusion of no residual effect.

ECO-007, p462, assumes great crested newt presence where ponds were not surveyed. That is a precautionary approach, but the response does not identify the unsurveyed Site 5 ponds, the assumptions about their terrestrial connections or the locations at which the specified measures will be applied.

White clawed crayfish and the connected watercourses

ECO-013, p469 of [PDA-012], referred to further information being provided at Procedural Deadline A. That information has now been supplied in the Applicant's Position Statement on White Clawed Crayfish [PDA-007].

Paragraph 1.3.1, printed page 1 of [PDA-007], acknowledges information concerning crayfish records in the wider River Tas catchment and adopts a precautionary assumption of potential presence in connected suitable habitat. Paragraph 2.1.3, p3, confirms that the earlier work assessed habitat suitability rather than undertaking targeted presence/absence surveys.

The Applicant acknowledges the limitations of unusually dry survey conditions but considers that the physical habitat evidence remains sufficient. It relies on avoidance and mitigation to conclude that further targeted surveys would not alter the assessment. Paragraph 2.3.1, p5–6, confirms that no further crayfish surveys had been completed in 2026 and none were proposed during the remaining survey window.

I acknowledge this clarification. My remaining concern is whether the controls have been demonstrated to address the particular pathways from Site 5 to potentially occupied downstream habitat. Low suitability within a ditch does not establish that it cannot convey sediment, pollutants or changes in flow to a more sensitive watercourse.

The statement identifies the River Tas and Hempnall Beck as sensitive receptors and relies on buffers, trenchless crossings, pollution prevention and biosecurity. However, it does not show how each Site 5 drainage connection and proposed crossing has been assessed against those controls. This includes any crossing required for an internal construction route from A23 across the western stream towards the substation which has yet to be published, that is capable of withstanding the estimated 317 tonnes for the transformer AIL.

I therefore ask for evidence showing how the measures would work at these locations, including during heavy rainfall, construction runoff or an accidental

release. Assuming potential presence is useful only if the assessment and secured measures adequately address the routes by which harm could occur.

Fencing, deer movement and danger on surrounding roads

ECO-009, p464 of [PDA-012], acknowledges that larger deer will be deterred from using fenced areas. ECO-022, p480, says that fencing will be aligned to avoid directing deer towards roads. These statements do not show how existing movement routes around Site 5 have been identified or how that outcome will be achieved.

There are already deer warning signs on the B1527 along the northern boundary of Site 5. These demonstrate that deer crossing is an existing recognised highway hazard. Together with repeated local observations, they reinforce the need to assess the routes actually used and the risk of displacing animals towards traffic.

Deer have been witnessed moving from the eastern side of Site 5 at The Street, Fritton, across Site 5, across [REDACTED] and through the fields towards Hall Farm and beyond. Movements also extend across the B1527 to [REDACTED] land. These observations identify an existing established network of movements through and around the proposed development.

Introducing extensive fencing could interrupt those routes, funnel deer towards gaps or fence ends, or cause them to seek alternative crossings of the surrounding roads. The concern is not confined to whether deer can enter the solar areas. It includes where animals will go when an established route is blocked, particularly where fencing, access tracks and vehicle movements interact near the highway.

The response does not demonstrate that the alternative routes would be continuous, suitable and available throughout construction and operation. Nor does it assess whether displaced movements could increase danger to drivers, pedestrians and residents using nearby accesses. General assurances about fence alignment do not resolve these specific concerns.

Again, the theme based response has not adequately addressed the local evidence raised about the area directly affecting me. Scheme wide habitat gains cannot, by themselves, demonstrate that the existing wildlife network around my home will continue to function or that road safety risks will not increase.

Requested response

I therefore ask the Applicant to provide:

- the Site 5 baseline habitat records and condition assessments, showing how existing stewardship management, field margins and historic hedgerows were included in the biodiversity calculations;
- maps of important habitat connections and evidence that they will remain functional during construction, operation and habitat establishment, taking account of lighting, fencing and infrastructure together;
- the Site 5 evidence supporting the bird conclusions and the precautionary assumptions and measures for unsurveyed ponds;
- a plan identifying Site 5 drainage connections, proposed watercourse crossings and potential downstream effects on crayfish habitat, with the specific controls, monitoring and corrective actions applicable to each;
- an explanation of how any internal access crossing of the western stream has been included in the ecological and water assessments;
- a deer movement assessment incorporating the observed routes from The Street across Site 5, [REDACTED] and the fields towards Hall Farm, together with crossings towards [REDACTED];
- a fencing and wildlife corridor plan demonstrating how these movements would be accommodated without creating dead ends or directing deer towards dangerous road crossings; and
- an assessment of the combined wildlife and highway safety effects, taking account of the existing deer warning signs, construction traffic and proposed accesses, with monitoring and enforceable corrective measures if displacement increases risk.

The relevant documents include Ecology and Biodiversity [APP-044], Bat Activity Survey Report [APP-157], Aquatic Habitat Assessment Report [APP-160], Outline Protected Species Mitigation Strategy [APP-161], Outline Landscape and Ecological Management Plan [APP-199], Biodiversity Net Gain Report [APP-218], Statutory Metric [APP-219] and the Applicant's Position Statement on White Clawed Crayfish [PDA-007]. I ask for the specific drawings, assessment findings and secured commitments relied upon.

21. Glint and glare during a continuous journey through the Scheme and uncertainty over panel selection

RR-1995 described my regular journey along the A140 and B1527, passing Sites 4A, 4B and 5. My concern was about repeated exposure along one journey, including at the roundabout, bends, gradients and gaps in vegetation.

GLI-001, p898–899 of [PDA-012], refers to the glint and glare assessment [AS-025 to AS-029], Other Environmental Matters [APP-054], planting and possible changes to panel orientation or tracker settings. The response confirms that road users are considered and describes mitigation. It does not identify where the continuous journey described in RR-1995 has been assessed.

The issue is whether the selected receptor positions and assumptions capture the duration and sequence of exposure as a driver moves along the route. Existing and new screening also need to be effective at the relevant time of year and from the relevant road position. This also needs to be achieved at the very start of the project as the effects from the panels will be immediate and will not wait until vegetation has grown up to shield them.

There is a further uncertainty concerning the relationship between the assessed layout and the design flexibility sought. My understanding is that the glint and glare assessment models specified locations for single-axis tracking panels and fixed panels, whereas the Applicant proposes to leave the final choice of panel type at particular locations to detailed design after the DCO is granted.

If that understanding is correct, the Applicant needs to explain how an assessment based on a particular distribution of panel types demonstrates the acceptability of the other arrangements that could subsequently be selected. Fixed panels and tracking panels have different orientations and operating characteristics. It cannot simply be assumed that changing between them at a particular location would leave the timing, duration and direction of reflections unchanged.

Does the assessment demonstrate the worst-case effects of the design flexibility sought, or does it identify which panel types and configurations are acceptable at particular locations? These have different implications. If the assessed layout represents the worst case, the Applicant should demonstrate why it bounds the alternatives still available at detailed design. If the conclusions depend on using particular panel types, orientations or tracker settings in particular places, those restrictions should be expressly identified and secured.

An assessment of one specified arrangement does not, without that explanation, demonstrate that all arrangements permitted by the proposed consent would be

acceptable. Equally, if the assessment informs where certain panels should not be used, it is unclear why the Applicant has not clearly stated those limitations and explained how they constrain the eventual design.

This matters directly to the roads and properties around Site 5. Residents and road users need to understand which outcomes have been assessed and which design restrictions are necessary to achieve them. A general assurance that panel orientation or tracker settings could be adjusted later does not resolve that uncertainty.

The Applicant's glint and glare assessment [AS-025], section 5.3, printed page 42, relies on existing and proposed vegetation to screen reflecting panels from road receptors B33–B38. The associated screening illustration appears in Appendix I, printed page 132, along the Site 5 frontage.

However, the A23 access drawing in [APP-175], PDF page 33, Sheet 37, specifies a 2.4m × 120m visibility splay. Note 5 on both that drawing and the A24 drawing, PDF page 31, Sheet 35, refers to hedge removal associated with vehicle tracking and visibility requirements. Both accesses are identified for construction and operational use.

The Applicant should demonstrate that these requirements have been reconciled. It should provide a combined plan showing the screening relied upon, access openings, visibility splays and any vegetation removal or height restrictions. It should confirm that the glint and glare assessment accounts for the resulting gaps throughout construction and operation. For A24, it should also identify the required visibility splay, which is not dimensioned on the cited drawing.

These documents establish the need for that explanation; they do not demonstrate that the screening and highway visibility requirements can both be achieved in the proposed layout.

Requested response

I therefore ask the Applicant to:

- identify the route sections and receptor points used to assess my journey along the A140 and B1527 past Sites 4A, 4B and 5, including the duration, frequency and sequence of potential exposure during low-sun periods;

- explain the assumptions concerning hedge gaps, terrain and seasonal screening, and identify the measures which must be effective before the relevant panels operate;
- identify the drawings and model assumptions specifying the locations of fixed panels and single-axis tracking panels, and explain how these relate to the choices remaining at detailed design;
- demonstrate whether the assessment covers the worst-case glint and glare effects of the panel types, layouts, orientations and tracker operating ranges for which consent is sought;
- identify any locations where a particular panel type or configuration must be excluded or restricted to avoid unacceptable effects, and explain how those restrictions would be secured; and
- explain how subsequent design changes would be checked against the assessed effects, who would approve that verification, and what would prevent a configuration with greater or different effects from being installed.
- provide a combined plan showing the glint and glare screening relied upon along the Site 5 frontage, the A23 and A24 access openings, visibility splays and any vegetation removal or height restrictions needed for safe access;
- confirm the visibility requirements at A24, which are not dimensioned on the cited access drawing, and demonstrate that both accesses can operate safely while retaining effective glint and glare screening; and
- demonstrate that the glint and glare assessment accounts for access gaps, hedge removal and restricted vegetation heights during construction and operation, identifying any alternative mitigation or panel-layout restrictions required and how these would be secured.

Where changes to tracker settings or panel configuration are relied upon as mitigation, I ask the Applicant to identify the circumstances requiring those changes, the means of securing and maintaining them, and how their effectiveness would be verified.

22. Access to the application documents and the later land notices

RR-1995 raised practical barriers for residents unable to use the online document set. It described being asked to identify particular documents or pages for printing, despite being unable to review the application to establish which documents were relevant. It also identified broken references in the Non-Technical Summary and difficulties with the paper registration process.

These concerns were raised again at OFH1, OFH2 and ISH1. They concern the digital skills, equipment and confidence that the process assumes residents possess, as well as access to the internet itself.

CON-001, CON-002 and CON-011 in [PDA-012], beginning at p96, 98 and 106 respectively, describe statutory consultation, electronic access, USB sticks, library computers, assistance and printed material on request. Those arrangements do not adequately answer how someone unable to navigate digital documents can independently understand the proposals and participate in the Examination.

Residents must be able to review documents before deciding which are relevant

Providing a USB stick or access to a library computer does not resolve the difficulty for someone who lacks the skills to search, navigate and cross-reference lengthy technical documents. Nor does offering selected printed pages provide meaningful access if the resident must first identify those pages from material they cannot use.

Residents cannot be expected to guess what they need to know. They must first be able to access and review the documents in order to decide which information is relevant to them.

Key application and Examination documents should therefore be available in physical form at an accessible central location, with an up to date index and practical assistance to identify relevant material. Residents should also be able to obtain paper copies of the documents and responses directly affecting them without first navigating the online library.

PDA-012 reinforces the existing barriers

The 968 page [PDA-012] illustrates the problem. Responses are organised by theme rather than supplied as a complete response to each individual representation. Residents must locate references to their representation, identify the relevant entries, distinguish the concerns grouped together and then follow references to other documents to understand the Applicant's position.

I am again having to assist my elderly neighbours so that they can access this process. They would not be able to sift through this document themselves to find the responses to their concerns. Their ability to participate should not depend upon another resident having the time, equipment and digital skills to carry out that work for them.

The thematic approach therefore creates an accessibility problem as well as the substantive difficulties identified elsewhere in this submission. A document being available online does not mean that the people affected can use it. The Applicant should provide these residents with an individual, clearly referenced response to their representation in paper form, including the supporting extracts needed to understand the answer.

Communication must reflect the resident's stated needs

Responding by email to someone who has already explained that they struggle with digital interactions does not demonstrate that their communication needs have been addressed. Assistance should be provided through a method they can actually use, including post and telephone where requested.

This concern also extends to the Planning Inspectorate's administration of the Examination. A resident who had requested communications in physical form received a one-page postal notification that the Rule 8 letter had been uploaded, together with the website address. The Rule 8 letter itself was not enclosed.

Posting a notice directing that resident back to a website leaves the original barrier in place. Why was the Rule 8 letter itself not posted, including the information needed to understand the timetable, deadlines and opportunities to participate?

I recognise that this is a matter for the Planning Inspectorate rather than the Applicant. However, both need to ensure that the arrangements work in practice for residents who have explained their difficulties. Sending notification of a document is not equivalent to providing accessible access to its contents.

General publicity does not identify the later land notices

RR-1995 also described further section 56 notices, their location some distance from the plots concerned and apparent differences from the land information I had reviewed. CON-057, p150–151 of [PDA-012], relies upon the consultation zone, publicity, notification arrangements and the scope of acquisition and temporary possession powers.

That response does not identify the particular notices, plots, dates or document changes underlying my concern. I am asking the Applicant to reconcile those notices with the submitted land information; I do not assume that the appearance of a notice alone proves that the Order Limits have changed.

These difficulties are compounded where residents cannot readily access the plans and documents needed to understand whether a notice affects their property or interests.

Requested response

I therefore ask the Applicant to:

- arrange for key application and Examination documents, including subsequent updates, to be available in physical form at an accessible central location, with an up-to-date index and practical assistance;
- explain how residents without digital access or skills can identify relevant information without first being required to navigate online documents or specify unknown page numbers;
- provide residents who require paper communication with an individual response to their Relevant Representation, identifying the answer to each concern and supplying the supporting extracts needed to understand it;
- record and follow residents' stated communication needs, providing usable postal or telephone assistance rather than relying on email;
- identify the action taken to correct the broken references in the Non Technical Summary [APP-194];
- provide a schedule identifying the later notices raised in RR-1995, the plots concerned, the relevant Land Plan [APP-006] and Book of Reference [APP-022] entries, and whether any document or boundary changed; and
- explain how affected persons were identified, notified where required and given an opportunity to respond to the relevant information.

I also ask the Examining Authority and Planning Inspectorate to:

- explain why the resident who requested physical communications received only a notification of online publication rather than the Rule 8 letter itself, and arrange for the complete letter and relevant annexes to be supplied;
- ensure that residents requiring paper communication receive the substantive procedural information needed to participate, including timetables, deadlines and subsequent changes; and
- consider whether any resident disadvantaged by these access barriers needs additional time or assistance to make an informed response.

Any reliance on the Consultation Report [APP-024] should identify the particular entries, dates and actions answering these concerns, rather than repeat general descriptions of the consultation arrangements.

23. Combined effects and the information needed before a decision

RR-1995 repeatedly explained that residents will experience the Scheme's effects together. At my home, construction activity, traffic, noise, vibration, lighting, landscape change and concerns about drainage and access will form one experience of living beside the development. My garden is only 11 metres from the Order Limits, and my driveway lies between A23 and A24. These circumstances require an assessment which brings the effects together at this location.

COMB-006, p951 of [PDA-012], refers to the In Combination Effects Assessment [APP-055]. It does not identify the where I can find the assessment for my home or explain the outcome when the relevant Site 5 effects coincide.

I acknowledge that a chapter addressing interrelationships exists. My concern is whether it incorporates the specific circumstances and unresolved matters identified throughout this submission. Where the underlying assessments omit relevant information, rely on disputed assumptions or leave important questions unanswered, referring to a combined assessment does not resolve those weaknesses.

The revised evidence needs to be considered together

The matters developed in this submission illustrate why separate topic responses are insufficient.

The traffic assessment must reflect the volumes actually experienced at the Site 5 accesses, taking account of vehicles turning off before reaching them. It must also explain the interaction between construction traffic serving Sites 5 and 7, A23 and A24, [REDACTED], neighbouring accesses, the nursery and adjacent businesses. The consequences include access difficulties, pedestrian safety, noise, disturbance and the effects of vehicles waiting or manoeuvring close to homes.

The discrepancies between the AIL vehicle specifications and the access tracking are also relevant to several assessments. The route from A23 to the substation, including any crossing of the western stream, needs to be understood before its implications for drainage, archaeology, trees, habitats, noise and vibration can be evaluated together. The historic brick tunnel and associated drainage infrastructure require consideration both as physical structures and as parts of the local water and historic landscape systems.

The relationship between glint and glare screening and highway visibility provides a further example. Vegetation relied upon to screen reflections must be compatible with access openings, visibility splays and any necessary hedge removal or height restrictions. Similarly, flexibility over fixed or tracking panels must remain consistent with the configurations assessed. These matters cannot be resolved by treating the transport, landscape and glint and glare proposals independently.

The existing ecological network also needs to be considered as a whole. Site 5 is already subject to positive management through Countryside Stewardship, and RR-1995 identified its wider habitat connections. Construction disturbance, fencing, lighting and changes to watercourses could affect that network simultaneously. Predicted future habitat gains do not establish that its functions would be maintained during construction. Displacing deer from established routes also has potential consequences for highway safety, particularly where the B1527 already carries deer warning signs.

The Applicant's identification of surviving pre-1845 hedgerow sections and the [REDACTED] estate landscape requires a more specific assessment than a broad description of twentieth-century agriculture. Existing historic features, new screening and major infrastructure would together determine the character of the landscape experienced from nearby homes and routes.

These effects would extend beyond construction. Operational transformer noise, the loss of openness and changes to land use would continue over the proposed 60-year operational period. Decommissioning would introduce further disturbance, followed by recovery periods which have not been clearly established. Retained planting and infrastructure could also affect whether the present landscape character and ecological functions can be restored.

Future detailed design must remain consistent with the assessed effects

EIA-002, p247–248 of [PDA-012], explains the use of a design envelope and reliance upon detailed management plans substantially in accordance with the outlines. It refers to EIA Methodology [APP-038], The Scheme [APP-040] and the draft DCO [AS-032].

That explains why some details remain flexible. It does not demonstrate how the particular uncertainties identified in this submission are accounted for in the conclusions.

I am not asking for every construction detail to be fixed now. I am asking the Applicant to distinguish between details that can be resolved within demonstrated assessment limits and information needed to establish what those limits and effects actually are. This includes the vehicle sizes and routes, watercourse crossings, panel configurations, screening requirements, ecological connections and protection of nearby properties.

Where mitigation for one effect could worsen another, the Applicant should demonstrate that the measures can operate together. It should also explain what happens if later surveys or detailed design show that an assumed route, screening arrangement or protective measure is not workable.

The outstanding explanation of why the 400kV Project Substation is required at Site 5, and what alternative locations were considered, is relevant to this overall assessment. The concentrated effects on this location should be considered alongside the evidence explaining the choice to place that infrastructure here.

A complete response must address the particular circumstances

The thematic structure of [PDA-012] has made it difficult to establish whether these relationships have been considered. My concerns have been divided between separate entries, often answered through general references to assessments or management plans. This does not provide a clear account of the combined consequences for my home and the surrounding area.

The accessibility difficulties described in section 22 further restrict residents' ability to identify and challenge those gaps. A meaningful response should bring together the relevant evidence, conclusions and commitments in a form that the affected person can understand and use.

Requested response

I therefore ask the Applicant to:

- identify the combined assessment for my house, its garden and access, together with the nearby properties, businesses, nursery and local routes affected by Site 5;
- show which construction activities and effects could coincide, including works and traffic associated with neighbouring sites and cable routes, and explain their combined duration and consequences;
- explain how the specific omissions, disputed assumptions and uncertainties identified in this submission have been incorporated into the assessment, revising the conclusions where necessary;
- demonstrate that the proposed mitigation measures are compatible, particularly highway visibility and glare screening, fencing and wildlife movement, watercourse crossings and downstream protection, and landscape planting and historic character;
- identify the design assumptions essential to the conclusions, the evidence supporting them and the precise requirements or commitments securing them;
- for matters deferred to later investigation or detailed design, identify what findings would require a change, how the resulting effects would be checked against those assessed, and who would approve and enforce the necessary action;
- assess the effects across construction, operation, decommissioning and subsequent recovery, distinguishing effects that would cease from those that could persist; and
- provide a consolidated response to the concerns raised in RR-1995 and developed in this submission, with precise references to the evidence and secured measures relied upon.

Where information is needed to understand the potential harm or establish whether mitigation is achievable, I ask the Examining Authority to require it during the Examination. The decision should be informed by the actual circumstances of Site 5 and those living beside it, with a clear explanation of how the combined effects would be addressed.

24. Accuracy of the points attributed to RR-1995

The comparison of [PDA-012] with my actual submitted Relevant Representation [RR-1995] raises a further concern about the accuracy and completeness of the Applicant's response. The themed entries associate my representation with some points which I did not raise, while reducing or omitting the specific detail of points which I did raise.

I appreciate that a themed row may combine the concerns of several people. An entry expressly referring to one respondent cannot automatically be read as a statement made by everyone listed. However, the document does not provide an individual account showing which part of each summary relates to me. It is therefore not a reliable substitute for a complete response to my own representation.

Duplicate references to RR-1995

RR-1995 appears twice within the respondent list for SOI-001, p816 of [PDA-012], and twice within the list for GLI-001, p899. These are repeated references within the same thematic entry, rather than references to separate issues.

Duplication alone does not establish that the substantive responses are incorrect. However, alongside the inaccurate associations and omissions identified in this section, these errors raise further concerns about the checking of the document and the reliability of its attribution lists. Repeating my reference does not demonstrate that my particular concerns have been fully answered.

I ask the Applicant to correct these duplicates, check the accuracy of the other associations with RR-1995, and provide a point-by-point account showing how each concern in my representation has been addressed.

Specific consultation points which are not in my submitted representation

- CON-005, p101 of [PDA-012], lists RR-1995 against a statement that respondents had requested a site visit since January 2026 and that the Applicant had declined. That account is not contained in my submitted RR-1995. The Applicant's general answer about engagement and future visits therefore does not answer a point made in that representation. I ask the Applicant to explain or correct that association.
- CON-011, p 06, lists RR-1995 against a statement that the process is discriminatory because it costs £5,000 to obtain the application documents. I did not state a £5,000 price. I explained that I had been asked to identify the particular documents or pages required, that a charge might apply if too many sheets were requested, and that residents unable to get online could not know what they needed to request. The amount attributed to the themed complaint is not my evidence, and an answer about the production cost of a full printed set does not resolve my actual accessibility concern.
- CON-012, p108, associates RR-1995 with a concern that objections must be repeated or resubmitted at subsequent stages. I did not make that complaint in the submitted representation. The response about recording consultation feedback and its influence on design does not answer my separate evidence about inaccessible documents, broken references, later notices and difficulties obtaining a paper registration form.
- CON-057, p150–151, introduces an implication that notices were deliberately placed to deny property owners the right to contest the application. I raised concerns about their location, apparent differences from the submitted land information and the opportunity for affected residents to respond. I did not allege a deliberate intention to deny rights. The Applicant should answer the factual matters I raised without attaching an allegation about motive which was not in my representation.
- **The Site 8 response does not belong to my Site 5 hydrology concern -** WAT-018, p558–559, lists RR-1995 against concerns specifically about Site 8, Shotesham Beck, Wash Lane and Market Lane. My submitted

hydrology concern was about Site 5, the nearby boreholes, the western watercourse, the historic [REDACTED] culvert and the River Tas catchment. The response in that row also concerns Site 8. As section 14 explains, that answer cannot resolve my Site 5 concern. I additionally ask the Applicant to correct or explain the association of RR-1995 with that Site 8 entry and identify the response to the actual Site 5 points.

- **The technical summaries sometimes change the question** WAT-006, p548, summarises the concern as soil compaction resulting from increased runoff. My point was the opposite causal sequence: heavy construction activity could compact the soil, reduce infiltration and increase runoff. The Applicant's response does discuss construction related compaction, but the summary should accurately record the mechanism I raised and the assessment should demonstrate its application to Site 5.
- TRA-038, p 723, describes the proposed Site 5 entrances as including the nursery and named businesses. Those are existing neighbouring premises and accesses. The proposed Scheme accesses are separate. My concern is their interaction with additional construction movements, as explained in section 12. The summary should distinguish those locations correctly so that the assessment addresses the actual conflict.
- TRA-013 and TRA-014, p701–702, associate RR-1995 with assertions about untraversable routes and vehicles approximately 45 metres by 5 metres. My specific documentary inconsistency was the 52 metre tracking vehicle compared with a 69.6 metre specialist transport figure for Site 5. My representation did not make the stated allegation about vehicles crossing untraversable pedestrian bridges. The response should identify and reconcile the differences in the figures supplied by the Applicant's specialist, as requested in section 13, rather than treating a different description of the objection as the answer.

Other mixed entries need individual attribution

There are further details in shared summaries which should not be presented as statements made in RR-1995 merely because my reference is included:

- NEE-005 and NEE-008, p 206 and 210, include specific OFGEM, NESO and connection-reform material which I did not cite. I did raise the regional capacity and site specific need concerns, but those detailed references should not be attributed to me;

- ALT-004, p 297, includes a contention that the dispersed Scheme should not be treated as one project. I described it as an integrated development whose combined effects should be assessed. My criticism of its dispersed layout was not a request to disregard its operation as one project;
- SCH-003 and C&D-005, beginning at p 225 and 265, include the change from 40 to 60 years, insolvency, subsequent ownership, brownfield classification and further development. My submitted concern was the 60 year duration, foundations, restoration and lasting landscape change; I did not raise those additional scenarios;
- LAN-004, LAN-007 and LAN-009, beginning at p 366, 371 and 376, include a specific planting period of 15 years or more, GNLP Policy 5, outdated parameters, the Great Moulton cluster and an independent landscape architect's conclusion. These are not the detailed claims made in my submitted representation;
- ECO-004, ECO-005 and ECO-013, beginning at p 452, 456 and 469, combine my species and habitat concerns with other respondents' particular sites, survey allegations, bird collision or extinction claims and licensing claims. Those additional statements should not be treated as my evidence; and
- SOI-002 and SOI-004, beginning at p 816 and 827, include a specific national farmland loss statistic and a suggestion that underground wiring prevents grazing. I did not make either point. My grazing concern was the absence of a secured commitment and the difference from the current arable use.

I am not suggesting that those other respondents' concerns should be removed from the Examination. I ask for an accurate record of who raised what and a response to the actual content of each representation. Otherwise, the inclusion of my reference alongside an answer may give a misleading impression that my particular issue has been addressed.

25. Further detail in RR-1995 which still requires an express answer

The earlier sections set out the principal unanswered matters. The comparison also identifies particular details which should be restored to the Applicant's response so that those matters are examined on the evidence I actually provided.

The distances supporting the Category 3 request

The opening of RR-1995 gave approximate distances of 11 metres from the Order Limits, 42 metres from the nearest arrays, 394 metres from the proposed 400 kV substation and 275 metres from the construction compound, together with the position of my driveway between A23 and A24.

CON-037, p 128 of [PDA-012], records only the belief that I should have been identified as a Category 3 interest. These distances were part of the explanation supporting that request. I ask the Applicant to identify which of my measurements it accepts, which it disputes, the receptor and infrastructure points used for its own measurements, and how those relationships informed its decision. These remain the approximate figures reported in RR-1995; I ask for them to be reconciled with the plans and assessment positions rather than assumed to be interchangeable with distances to the house frontage or Walled Garden.

The geographical extent of the visual assessment

RR-1995 distinguished between the Scheme's land area, described as approximately 1,212 hectares or 3,000 acres, and its much wider potential visual influence. It referred to visibility mapping extending towards an area of 100,000 acres and to maps limited to a 5 kilometre extent. That concern is not answered by a general statement that a landscape assessment has been undertaken.

I recognise that a Zone of Theoretical Visibility shows potential visibility rather than proving significant harm throughout the mapped area. I ask the Applicant to explain the actual study area and mapping limits, whether the 5 kilometre boundary is a display limit or an assessment limit, and how potentially affected receptors beyond it were considered. If my interpretation of the area or map extent was incorrect, I ask for the corrected figure and explanation.

This is a specific question arising from RR-1995's scale and landscape sections. The response under LAN-009, p 376–377 of [PDA-012], should identify the evidence in Landscape and Visual [APP-043] and the relevant mapped assessment material which answers it.

Operational hours outdoor amenity and changes after commissioning

RR-1995 raised the use of operational time restrictions, including for inverters in early morning periods, and the effect of ongoing plant and associated activity on the use of my outdoor space. Section 10 asks for equipment data, background records and compliance controls. I additionally ask the Applicant to identify any

operating hour restrictions assumed in the Site 5 predictions, the equipment to which they apply and the obligation which secures them.

I also ask whether the assessment positions represent the garden and other outdoor amenity areas at my home, and how relevant cooling equipment, maintenance and welfare or office activity have been included. The responses in NOI-003, NOI-013 and NOI-024 should show how the conclusions apply during the quieter periods identified in my representation, not simply state a general residential limit.

Where commissioning checks, complaints or later replacement of equipment could reveal a different noise profile, I ask how compliance with the assessed limits will be demonstrated and what action will occur while a problem is investigated. The existence of a complaints procedure does not itself explain that interim protection.

The existing ecology and the full operational period

RR-1995 identified at least seven known Barbastelle maternity colonies within range and eight bat species recorded by the Applicant, alongside existing stewardship management and the mapped habitat-network designations around Site 5. ECO-005 and ECO-051 acknowledge colonies, habitat connections and buffers, but do not identify which of those specific records and mapped areas informed the Site 5 conclusions.

In addition to section 20's requests, I ask the Applicant to reconcile those records with its Site 5 baseline and explain what protection, management and monitoring will continue throughout the full 60-year operational period. The answer should identify the responsible party, review arrangements and corrective measures if habitat creation or connectivity does not perform as predicted. A headline net-gain figure does not explain how the ecological function relied upon will be maintained over that duration.

The specific evidence concerning notices and paper registration

RR-1995 reported notices placed more than 1.3 kilometres from one affected location and approximately 600 metres from others, together with a lack of notification to occupiers directly beside some plots. These were specific observations requiring reconciliation, rather than a general objection to publicity. I ask for the locations, plots, dates and notification records which answer them, as part of the schedule requested in section 22.

My representation also described difficulty finding the Planning Inspectorate telephone number, an initial call followed by referral for a callback, a requested paper form which did not arrive, and the need for another call and a follow-up email. Those steps used time within a fixed deadline. They are not answered by the Applicant stating that it offered telephone, postal and email contact routes.

I ask the Examining Authority to address those registration difficulties as a procedural matter, including how people unable to use email can obtain forms, confirm receipt and participate within the applicable deadlines without relying on a digitally skilled neighbour.

26. Accessibility and the need for individual responses

The Applicant has replied to individual Relevant Representations through a very large document arranged by theme. My own reference is dispersed across numerous entries, many combining different concerns from different people. The result is that the specific points raised by an individual can be lost, altered or left unanswered even where their representation number appears beside a response.

For a resident without usable internet access, a suitable device, a PDF reader or the skills to search and navigate a document of this size, finding and checking the replies to their own representation is not realistically accessible. A USB stick or access to a library computer does not resolve a lack of digital skills. Nor does an offer to print selected pages solve the problem if the person cannot first identify those pages.

This difficulty was raised at the Procedural Hearing, including the disadvantage faced by people with poor internet access, limited access to devices and limited or no digital skills. In my view, the format places those residents at a serious disadvantage in their ability to participate effectively.

I have digital access and the skills to search documents. Even so, it has taken me many hours, with the assistance of AI, to locate the responses linked to RR-1995 and compare them with what I actually submitted. An ordinary member of the public should not need that level of time and assistance simply to establish whether their own points have received an answer.

The problem concerns accuracy as well as navigation

The discrepancies in section 24 and the unanswered details in sections 10–25 demonstrate why an index of themed rows would only provide part of the solution. As a record of the response to RR-1995, PDA-012 is inaccurate in the

associations identified above and incomplete in its treatment of the actual concerns raised. Those deficiencies need to be corrected, as well as making the answers easier to find.

A person should be able to identify their original point, see the Applicant's answer to it and understand what remains disputed. The appearance of an RR number in a themed table should not be treated as evidence that the entire representation has been answered.

Requested response

I respectfully ask the Examining Authority to require the Applicant to provide an individual response to each Relevant Representation, addressing the points actually raised by that individual. For RR-1995, this should include:

- a complete list of the substantive points in my submitted representation, in their original order or with a clear cross-reference to the relevant passage;
- a separate answer to each point, including the specific local facts, figures, locations and discrepancies raised;
- correction or explanation of the matters incorrectly associated with RR-1995, so that the response does not attribute another person's statement to me;
- the Examination Library reference and precise page, paragraph, table or drawing relied upon for each answer, with an explanation of how it answers the particular concern;
- a clear statement where a point remains unanswered, is disputed or depends upon further information, identifying what will be supplied and when; and

A complete paper copy of the individual response and relevant supporting extracts should be provided for anyone who cannot use the electronic material, available through a practical non-digital request process.

Where the same technical answer applies to several people, it can be repeated or incorporated into their individual responses. Each person must still receive a complete and understandable answer to their own points, including the circumstances of their property or locality.

I also ask that affected people have a fair opportunity to comment on corrected or additional answers once received. These requests are intended to enable the

Examination to proceed on an accurate record of the concerns raised and the extent to which the Applicant has actually answered them.

Conclusion

I maintain my objection to East Pye Solar, particularly the proposals for Site 5 which is directly opposite me. My concern is what this development would mean for my family, our community and the countryside in which we live and work, and in which my children are growing up.

With my garden approximately [REDACTED] from the Order Limits and our driveway between [REDACTED], the effects would reach directly into our daily lives. Noise, traffic, vibration and landscape change would affect our enjoyment of our home and garden. The uncertainty over these effects and the effort required to obtain clear answers already place a considerable burden and stresses on myself and my family.

Our concerns are also project wide. Our journeys, work, visits to neighbours and use of local paths take us through all areas affected by the Scheme. We would experience its sites, infrastructure and construction activity together. These combined effects cannot be understood solely through separate assessments of individual locations.

A 60 year operational period would shape our surroundings for approximately two generations and be the lasting memory I have of the calm, quiet home that I considered my sanctuary from the stress and strains of modern day life, that I currently cherish and love. The historic features, hedgerows, field patterns, villages and rural routes contribute to the identity of this area. Retaining individual features or planting screening does not necessarily preserve their setting, the open landscape or the connections between them. Eventual decommissioning would not return the intervening decades of tranquillity and enjoyment.

I ask the Examining Authority to require clear answers to the outstanding concerns, a convincing justification for the infrastructure proposed at Site 5, and specific, enforceable protection for affected residents and the environment. Residents must also receive accurate, understandable responses and access to documents in a form they can use.

I recognise the importance of renewable energy, but remain unpersuaded that the Applicant has justified the scale, concentration, duration of the harm proposed or that this is the right and only location for this scheme. I ask the Examining Authority not to recommend consent for the Scheme in its present form.

Annex A External references

Victoria Chandler • RR-1995

East Pye Solar • EN0110014

Written representation concerning my home and Site 5

This annex identifies the external sources referred to in my written representation that the ExA may not be familiar with. I have not included the references for Planning Act 2008, Infrastructure Planning Reg 2017, EN-1, EN- 3, or EN-5, as I understand the ExA is already aware of these. Applicant and other Examination Library documents are not repeated here because their Examination Library reference IDs are given in the submission.

The VC-EXT numbers below identify sources for the accompanying appendix copies; they are my reference labels, not Examination Library IDs. Relevant passages are identified so they can be located without hyperlinks. This annex is a reference list, not a bundle of the source documents.

VC EXT 01 Noise and vibration study areas

Highways England. Design Manual for Roads and Bridges, LA 111 Noise and vibration. Revision 2, May 2020.

Submission sections 1 and 4. Paragraph 3.8 (construction traffic noise study area) and paragraph 3.29, Note 1 (construction vibration study area).

VC EXT 02 Category 3 interests

Planning Act 2008, 2008 c. 29.

Submission section 2. Section 57, particularly subsections (4)–(6), defining Category 3 and relevant compensation claims.

VC EXT 03 Government guidance on affected land interests

Ministry of Housing, Communities and Local Government. Planning Act 2008: Guidance on preparing an application: Part 1 – Pre-application steps. Published 3 July 2026.

Submission section 2. Paragraph 6.13, concerning potential compensation claims arising from construction or operation, including where land is not compulsorily acquired.

VC EXT 04 Transformer noise

Department for Energy Security and Net Zero. National Policy Statement for Electricity Networks Infrastructure (EN-5). December 2025.

Submission section 10. Paragraphs 2.9.38–2.9.40, especially paragraph 2.9.39 on transformer hum; read with the noise assessment and mitigation provisions in section 2.9.

VC EXT 05 Background sound and assessment conditions

Environment Agency. Noise and vibration management: environmental permits. Updated 12 May 2026.

Submission section 10. Step 2, off-site monitoring survey: variation in background sound and assessment of worst-case conditions. This is environmental permitting guidance used in the submission as relevant good practice.

VC EXT 06 Implementation of BS 4142

Environment Agency. Method implementation document (MID) for BS 4142. Updated 22 December 2023. Applies to England.

Submission section 10. Guidance on measurement locations, including “Specific sound level from surrogate measurement locations”; section 8 on background sound; section 9.1 on rating level, acoustic character and human observations. The submission acknowledges its environmental regulatory context.

VC EXT 07 Industrial and commercial sound assessment standard

British Standards Institution. BS 4142:2014+A1:2019, Methods for rating and assessing industrial and commercial sound. 2019.

Submission section 10. Standard identified in connection with background sound, rating level and tonal corrections. Bibliographic reference only: the licensed standard is not reproduced in this annex.

The freely accessible regulatory guidance is separately identified at VC-EXT-05 and VC-EXT-06; it does not replace the standard.

VC EXT 08 Reasonable alternatives

Department for Energy Security and Net Zero. Overarching National Policy Statement for Energy (EN-1). December 2025.

Submission section 15. Paragraphs 4.3.9 and 4.3.15: the distinction between finding the best possible option and providing information about reasonable alternatives studied.

VC EXT 09 Environmental assessment requirements

The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, SI 2017/572.

Submission sections 15 and 17. Schedule 4, paragraph 2 (reasonable alternatives studied) and paragraph 5 (description of likely significant effects, including duration and permanent and temporary effects).

VC EXT 10 Harvest conditions in 2025

Agriculture and Horticulture Development Board (AHDB). Harvest Progress Report 6, week ending 24 September 2025.

Submission section 16. Final 2025 harvest report, including crop yield commentary and variation in performance. National and regional context; it does not establish yields or losses on the application land.

VC EXT 11 Harvest conditions in 2026

Agriculture and Horticulture Development Board (AHDB). Harvest Progress Report 4, week ending 21 September 2026. Final report listed on Harvest progress across the UK, updated 25 September 2026.

Submission section 16. Final harvest commentary on yield variability, rainfall and soil conditions. National and regional context; it does not establish yields or losses on the application land.

VC EXT 12 Climate and drought context

Met Office. Climate extremes are becoming the new ‘normal’ for the UK. Published 14 July 2026.

Submission section 16. Hydrology section, including comments attributed to Lucy Barker of the UK Centre for Ecology & Hydrology. Read the full passage: it distinguishes recent droughts consistent with future projections from the absence of a widespread significant worsening trend in the long-term river-flow record.

VC EXT 13 Project lifetime and finite consent

Department for Energy Security and Net Zero. National Policy Statement for Renewable Energy Infrastructure (EN-3). December 2025.

Submission section 17. Paragraphs 2.10.57–2.10.58 on project lifetime and temporary, finite consent. Paragraph 2.10.57 describes 40 years as typical while allowing applications for different periods.

VC EXT 14 Historic hedgerows and field systems

The Hedgerows Regulations 1997, SI 1997/1160.

Submission section 19. Schedule 1, Part II, paragraph 5: the archaeology and history criterion concerning field systems pre-dating the Inclosure Acts. This is the statutory reference underlying the historic field-system discussion in the submission.