

Written Representation submitted by Stuart and [REDACTED] Shearer, registered Interested Parties, Old Hall Barn, Hawes Green, Shotesham St Mary, Norfolk, NR15 1UW. This representation objects to the inclusion of Site 8 and raises grounds relating to visual impact, RVAA methodology failures, Highfield baseline errors, tracker panel orientation, heritage harm to the Hawes Green heritage cluster, ecology, water environment and construction traffic. This is the definitive joint Written Representation and supersedes any earlier version.

WRITTEN REPRESENTATION

East Pye Solar — Planning Inspectorate Reference EN0110014

To: The Examining Authority, The Planning Inspectorate

Submitted by: Mr. Stuart Shearer & Mrs [REDACTED] Shearer – Interested Parties

Property: Old Hall Barn, Hawes Green, Shotesham St Mary, Norfolk, NR15 1UW

Date: 10th September 2026

1. Introduction

1.1 This Written Representation is submitted by Stuart Shearer on behalf of the owners and occupiers of Old Hall Barn, Hawes Green, Shotesham St Mary, Norfolk, NR15 1UW (the Property). It expands upon our Relevant Representation submitted in June 2026.

1.2 The Property is a Grade II listed residential barn conversion situated within the Shotesham Conservation Area in South Norfolk. Our principal outlook is to the south and south-east, across open agricultural countryside toward Saxlingham Nethergate and beyond. It is in this direction that Sub-Sites 7I, 7J, 7K, 7L (forming part of Site 7) and Sub-Sites 8A and 8B (Site 8) are located, at distances of approximately 1.6km from the Property.

1.3 The Property forms part of a tight-knit historic cluster on Hawes Green comprising three Grade II listed residential buildings — Old Hall Barn, Church View Barn, and Old Hall Farm and Watendlath the 3rd barn in the cluster— together with the Grade II* listed St Mary's Church (Historic England List Entry 1050642) and the Grade II listed medieval ruin of the Remains of the Church of St Martin (List Entry 1152468), situated approximately 100 metres from St Mary's.

1.4 We object to the Scheme as proposed and request that the Examining Authority carefully considers the matters set out below. We do not object to renewable energy in principle but submit that the Scheme as currently assessed and designed would cause significant and inadequately mitigated harm to the visual amenity, residential amenity, and heritage setting of the Property and the wider Hawes Green heritage cluster, and that this harm has not been properly evaluated in the Environmental Statement.

2. Visual Impact — Inadequate Assessment of the Property and Heritage Cluster as Receptors

Site 8 is the Highest Sensitivity Landscape Site in the Entire Scheme

2.1 Table 7.3 of ES Chapter 7 (APP/6.1.7, Revision 1, March 2026) confirms that Site 8 is assessed as High value, High susceptibility and High sensitivity — the only

solar site in the entire 1,100 hectare scheme to receive this rating. All other solar sites are rated medium sensitivity.

2.2 Table 7.5 of ES Chapter 7 further confirms that during construction, Site 8 is assessed as having a Moderate magnitude of effect resulting in a Major level of significance and Significant adverse effect on landscape character — the highest construction-phase landscape impact rating of any solar site in the scheme.

2.3 Despite Site 8 receiving the highest possible landscape sensitivity rating and a Major Significant adverse construction effect by the Applicant's own assessment, no viewpoint has been assessed from the Property at Hawes Green, from St Mary's Church (Grade II*), or from St Martin's Church (Grade II). We submit this is a material and inexplicable omission.

Hawes Green is Entirely Absent from the Visual Assessment

2.4 Table 7.4 of ES Chapter 7 lists 21 separate viewpoints assessed for Sites 7 and 8 combined. Hawes Green does not appear as a named receptor or viewpoint location anywhere in the assessment.

2.5 The only assessed viewpoint in the vicinity of the Property is Site 7 VL11 — described as PRow Shotesham FP21 — rated medium value, medium susceptibility and medium overall sensitivity. This is a public footpath assessment, not a residential receptor assessment, and does not represent the impact on the domestic curtilage and primary living outlook of the Property.

2.6 ES Chapter 7 paragraph 7.5.22 explicitly states that potential visual effects are likely to be experienced from 'settlement edges of... Shotesham' and from 'PRow... around Shotesham'. Having acknowledged Shotesham as a settlement from which visual effects are likely, the Applicant has then failed to assess any residential receptor viewpoint within Shotesham St Mary or Hawes Green. This is a direct internal inconsistency in the assessment.

2.7 ES Chapter 7 paragraph 7.7.14 confirms that solar PV panel development within Sub-Sites 8A and 8B has been excluded in proximity to residential properties on Market Lane, Wash Lane 'and from Shotesham'. This acknowledgement that Shotesham is a sensitive residential receptor makes the absence of a viewpoint assessment from within the settlement even more inexplicable.

St Mary's Church (Grade II*) and St Martin's Church (Grade II)

2.8 St Mary's Church, Shotesham St Mary is a Grade II* listed building — a designation held by only approximately 6% of listed buildings in England — with Historic England List Entry 1050642. The Remains of the Church of St Martin (List Entry 1152468) is a Grade II listed medieval ruin situated approximately 100 metres from St Mary's. Neither building appears as a named viewpoint receptor in the visual assessment.

2.9 ES Chapter 7 paragraph 7.3 and the Scoping Opinion response table confirm that impacts on Conservation Areas are to be assessed, cross-referenced between the LVIA and ES Chapter 10. The Shotesham Conservation Area, which contains both churches and the Property, is not the subject of any assessed viewpoint in either direction in the LVIA.

2.10 An independent Landscape Architect commissioned by objectors has assessed the impact of Site 8 on the Shotesham Conservation Area and judged that this is a

valued landscape and that the harm caused by the Scheme would be significant. We request that the Examining Authority gives full weight to this independent professional assessment.

The 2km Study Area and the Property's Position Within It

2.11 ES Chapter 7 paragraph 7.5.6 defines the Study Area as extending 2km from the boundary of Sites 1 to 10. Sub-Site 8B is located approximately 1.6km from the Property — squarely within the defined 2km study area for which detailed assessment is expected.

2.12 The Planning Inspectorate's Scoping Opinion (noted in Table 7.1 of ES Chapter 7) specifically directed the Applicant that the ES should assess potential effects on views and visual amenity within the ZTV where significant effects are likely. We request that the Examining Authority requires the Applicant to confirm whether the Property falls within the ZTV for Site 8 (Figure 7.5.4) and Site 7 (Figure 7.5.5) and, if so, to explain why it has not been assessed as a named residential receptor viewpoint.

2.13 We submit that the LVIA contains the following material gaps directly relevant to the Property and the Hawes Green heritage cluster:

- No viewpoint assessment from Hawes Green or the Property, despite Shotesham being identified in paragraph 7.5.22 as a settlement from which visual effects are likely;
- No residential receptor assessment from within the Shotesham Conservation Area looking toward Sites 7 and 8;
- No viewpoint assessment from or toward St Mary's Church (Grade II*) or St Martin's Church (Grade II);
- No assessment of the impact of Site 8 on the Shotesham Conservation Area within the LVIA, despite the site being the highest sensitivity landscape in the scheme; and
- An internal inconsistency between paragraph 7.5.22 and the viewpoint selection, which contains no assessed viewpoint from within Shotesham St Mary or Hawes Green.

2.14 We submit that these gaps are material deficiencies in the environmental information before the Examining Authority, and that the examination should not conclude without the Applicant being required to address them.

3. Tracker Panels — Orientation, Height and Morning Visual Impact

3.1 Table 4.1 of ES Chapter 4 (APP/6.1.4) confirms that the Scheme is assessed under a Rochdale Envelope including Option A: Single-Axis Tracker Panels on all Sites including Sites 7 and 8. ES Chapter 7 paragraph 7.4 confirms the visual assessment has been undertaken solely on the basis of Option A as the worst-case parameter. The ES confirms the following parameters:

- Maximum height at greatest inclination: 4.5 metres
- Maximum inclination: 60 degrees from horizontal
- Row alignment: north-south
- Tracking direction: east in the morning, west in the evening

3.2 During morning hours, tracker panels on Sites 7 and 8 would be inclined at up to 60 degrees facing east and north-east — directly toward the Property. At maximum inclination panels would reach 4.5 metres, significantly exceeding typical hedgerow height in this landscape and presenting their maximum surface area toward Hawes Green during the hours of day when residential amenity is most valued.

3.3 This is materially worse than a fixed south-facing installation, which would present only its edge profile toward the Property. Given that no viewpoint assessment has been conducted from the Property, there is no evidence that the LVIA has assessed this morning-orientation tracker panel configuration from a residential receptor to the north-east of Sites 7 and 8.

3.4 We request that the Examining Authority requires the Applicant to confirm that the LVIA has specifically assessed morning-orientation tracker panels at maximum inclination (4.5m, 60 degrees) from viewpoints to the north and north-east of Sites 7 and 8, and that this worst-case parameter has been applied to residential receptors in Shotesham St Mary and Hawes Green.

4. Glint and Glare — Bifacial Tracker Panels

4.1 ES Chapter 4 confirms that all solar panels under the Scheme will be bifacial — meaning both front and rear faces are photovoltaic and reflective surfaces. Combined with tracker orientation, during morning hours the rear face of panels on Sites 7 and 8 would be angled toward the north-east, presenting a reflective surface directly toward the Property.

4.2 ES Chapter 7 paragraph 7.4 confirms that a Glint and Glare assessment has been undertaken as part of ES Chapter 18 (APP/6.1.18). The Planning Inspectorate's Scoping Opinion directed the Applicant to use the ZTV to identify ground-based sensitive receptors with potential views who may be affected by glint and glare.

4.3 Given the absence of any assessed viewpoint from Hawes Green or the Property in the LVIA, we request confirmation that the Glint and Glare assessment has specifically assessed bifacial tracker panels in morning-east orientation toward residential receptors at Shotesham St Mary and Hawes Green, and that the Property has been considered as a sensitive receptor in that assessment. If this assessment has not been undertaken for this receptor direction, we submit it represents a further material gap.

5. Panel Type Flexibility and Post-Consent Risk

5.1 The Rochdale Envelope approach means the Applicant retains flexibility to choose between tracker panels (Option A) and fixed panels (Option B) on each sub-site after consent is granted. There is no sub-site-specific commitment in the draft

DCO to the use of fixed rather than tracker panels on the sub-sites closest to the Property.

5.2 We submit that the DCO requirements should include a condition restricting the use of tracker panels on sub-sites within a defined distance of residential properties, or alternatively requiring a further detailed assessment of panel type as part of the pre-commencement approval process for each sub-site.

6. Ecology — Barbastelle Bats and Shotesham Woods

6.1 Barbastelle bat activity has been specifically recorded in Shotesham woods, which are in close proximity to the Property. Barbastelle bats are a highly protected species dependent on connected dark landscapes and functional commuting and foraging habitat.

6.2 Multiple maternity colony core sustenance zones are understood to overlap Site 8 and its cable corridors. We submit that the ecological assessment has not adequately addressed the impact of Sites 7 and 8 on this nationally important bat population, and that Favourable Conservation Status cannot be guaranteed by building this infrastructure on these sites.

6.3 Peer-reviewed research indicates that bats confuse solar panels at horizontal orientation for water bodies, adversely affecting their ability to hunt. This specific risk to barbastelle populations using Shotesham woods has not been adequately assessed.

7. Ecology — White Clawed Crayfish and Aquatic Survey Methodology

7.1 Sites 7 and 8 are directly hydrologically connected to the Tas chalk stream. Norfolk Rivers Trust has survey results recording a breeding colony of White Clawed Crayfish in the Tas. We understand that East Pye Solar has erroneously stated that the Tas chalk stream is unlikely to support White Clawed Crayfish.

7.2 We further understand that aquatic surveys for the Scheme were carried out when streams and ditches were dry — a methodology that is unacceptable in a chalk stream catchment known to support this species. We submit that this represents a fundamental flaw in the ecological baseline for Sites 7 and 8.

8. Ecology — Rare Botany

8.1 Sites 7 and 8, along with their access routes and cable corridors, are understood to support rare assemblages of botany of significant value. We are aware that a level 6 botanist familiar with the botanical record of this area has written formally to East Pye Solar stating that full season botanical surveys must be carried out before the project progresses further.

8.2 We understand that no such surveys have been undertaken. This represents a material gap in the environmental assessment and we submit that the Scheme should not be consented before adequate botanical survey work has been completed and assessed.

9. Water Environment

9.1 Sites 7 and 8 sit within the highly sensitive Tas chalk stream and chalk aquifer catchment. We submit that impacts on private sewerage and hydrological connectivity have not been assessed, and that insufficient hydrological and hydrogeological modelling has been carried out to ascertain the true impacts of the Scheme on this catchment.

9.2 We are particularly concerned about the proposal to drill under the Tas to link Sites 5 and 7, given the presence of White Clawed Crayfish and the sensitivity of the chalk stream ecosystem.

10. Heritage — Shotesham Conservation Area, St Mary's Church (Grade II*) and St Martin's Church (Grade II)

10.1 The Shotesham Conservation Area contains an exceptional cluster of designated heritage assets: three Grade II listed residential buildings at Hawes Green (Old Hall Barn, Church View Barn and Old Hall Farm), the Grade II* listed St Mary's Church (List Entry 1050642), and the Grade II listed medieval ruin of St Martin's Church (List Entry 1152468) approximately 100 metres distant.

Under Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, decision-makers must give special regard to the desirability of preserving listed buildings and their settings. The Court of Appeal confirmed in *Barnwell Manor Wind Energy Ltd v East Northamptonshire DC [2014]* that this duty requires decision-makers to give 'considerable importance and weight' to harm to listed buildings and their settings. This duty applies with even greater force to the Grade II* listed St Mary's Church.

10.3 An independent Landscape Architect commissioned by objectors has assessed the impact of Site 8 on the Shotesham Conservation Area and judged that this is a valued landscape and that the harm caused by the Scheme would be significant. Over 300 Listed Buildings fall within the zone of influence of the Scheme, and the settings of multiple Listed Buildings in this area would be materially harmed.

10.4 This scheme would industrialise a rural historic landscape of high sensitivity. These are location-based harms which arise because this is the wrong place for a scheme of this scale.

11. Construction Traffic — Abnormal Loads, Saxlingham Nethergate and Heritage Assets

11.1 The Outline Construction Traffic Management Plan (APP/7.6) identifies that Abnormal Indivisible Load (AIL) movements for the transformer serving Sub-Site 7F will be routed via The Street, Saxlingham Nethergate. To accommodate these abnormal loads, which may be up to 5.5 metres wide, the 4.5 metre-wide street through the village would need to be widened.

11.2 The proposed widening would require the demolition of an 18th century wall at the Old Rectory and the expansion of the carriageway onto part of the triangular parcel of land on which Saxlingham Nethergate's Grade II listed war memorial stands. This is an extraordinary and wholly unacceptable proposal.

11.3 This directly contradicts the stated objective of the Outline CTMP that construction vehicle routes have been selected with the principal aim of avoiding routing vehicles through local villages, wherever practicable, including Saxlingham Nethergate. The AIL route as proposed does the precise opposite — it routes the largest and most disruptive vehicles directly through the village and requires the destruction of heritage fabric to do so.

11.4 Norfolk County Council as Highway Authority has formally recorded serious concerns about construction traffic management for this scheme, stating that inadequate engagement to date could lead to unsuitable roads being used for construction traffic. The AIL routing through Saxlingham Nethergate illustrates exactly this risk.

11.5 We request that the Examining Authority requires the Applicant to demonstrate that no viable alternative AIL route exists that avoids The Street in Saxlingham Nethergate and eliminates harm to the Grade II listed war memorial and the 18th century wall at the Old Rectory.

12. Property Value and Residential Amenity

12.1 The Property is a Grade II listed barn conversion whose value and amenity is directly connected to its open rural outlook to the south and south-east. The introduction of industrial-scale solar infrastructure — including 4.5 metre tracker arrays at maximum inclination, 2.5 metre perimeter deer fencing, CCTV poles at 3 metres, and substation infrastructure at up to 7 metres — across the countryside in this principal view direction would materially alter the character of that outlook.

12.2 The Applicant's own assessment confirms that Site 8 — the landscape site rated as highest sensitivity in the entire scheme — will experience a Significant adverse effect on landscape character at Year 1 of operation. Despite this, no assessment has been made of the impact on the residential visual amenity of the Property at Hawes Green. We submit that the residual impact on the Property is likely to be significant.

12.3 The cumulative visual effect of Sub-Sites 7I, 7J, 7K, 7L, 8A and 8B from the Property, viewed together across a south to south-east arc at distances of 1.6km has not been adequately assessed. The combination of tracker panel orientation toward the north-east in morning hours and the acknowledged high sensitivity of this landscape means that harm to residential visual amenity at the Property is both foreseeable and unassessed.

13. Requests to the Examining Authority

We respectfully request that the Examining Authority:

- (a) Requires the Applicant to confirm whether the Property at Hawes Green falls within the ZTV for Sites 7 (Figure 7.5.5) and 8 (Figure 7.5.4), and if so to explain why it has not been assessed as a named residential receptor viewpoint in the LVIA, given that paragraph 7.5.22 of ES Chapter 7 identifies Shotesham as a settlement from which visual effects are likely;

- (b) Requires the Applicant to produce a viewpoint assessment and appropriate visualisation from the Property or from a representative location within the Shotesham St Mary / Hawes Green settlement, assessing the impact of Sub-Sites 7I, 7J, 7K, 7L, 8A and 8B in tracker panel configuration at maximum inclination (4.5 metres, 60 degrees, morning-east orientation);
- (c) Requires the Applicant to produce a viewpoint assessment from or toward St Mary's Church (Grade II*, List Entry 1050642) and the Remains of St Martin's Church (Grade II, List Entry 1152468), given their status as designated heritage assets within the Shotesham Conservation Area;
- (d) Requires the Applicant to confirm that the Glint and Glare assessment (ES Chapter 18) has specifically assessed bifacial tracker panels in morning-east orientation toward residential receptors at Shotesham St Mary and Hawes Green;
- (e) Considers whether DCO requirements should restrict tracker panel use on sub-sites within a defined distance of residential properties, or require sub-site-specific panel type approval as part of the pre-commencement process;
- (f) Gives full weight to the independent Landscape Architect's assessment that harm to the Shotesham Conservation Area from Site 8 would be significant, particularly in the context of the Applicant's own assessment of Site 8 as the highest sensitivity landscape site in the scheme;
- (g) Satisfies itself that the Section 66 duty has been discharged with the considerable importance and weight required by *Barnwell Manor Wind Energy Ltd v East Northamptonshire DC* [2014] in respect of the Grade II* listed St Mary's Church and the Grade II listed St Martin's Church;
- (h) Requires adequate full-season botanical surveys to be completed for Sites 7 and 8 before the examination concludes;
- (i) Requires further aquatic survey work for Sites 7 and 8 carried out under appropriate hydrological conditions;
- (j) Requires the Applicant to demonstrate that no viable alternative AIL route exists that avoids The Street in Saxlingham Nethergate and eliminates harm to the Grade II listed war memorial and the 18th century wall at the Old Rectory; and
- (k) Includes this Written Representation in the evidence considered at any Issue-Specific Hearing relating to landscape and visual impact, ecology, heritage and transport.

14. Conclusion

14.1 We do not object to renewable energy development in principle. We recognise the national importance of the energy transition.

14.2 However, we submit that the LVIA as submitted contains material gaps in its evaluation of visual and residential amenity impact on the Property and on the Shotesham Conservation Area. Site 8 is rated as the highest sensitivity landscape

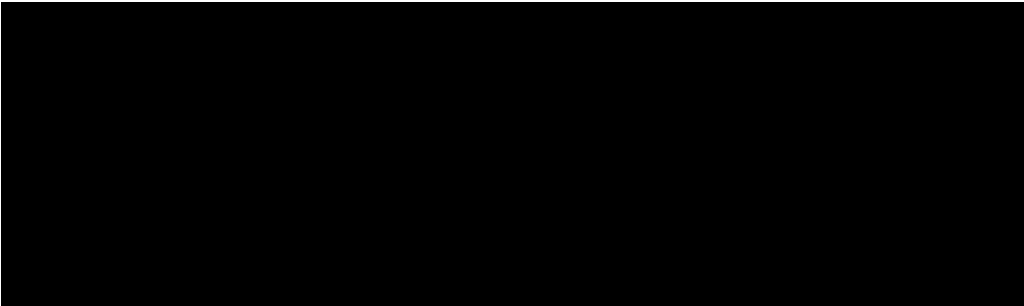
site in the entire scheme by the Applicant's own assessment, yet no viewpoint has been assessed from Hawes Green, from the Property, or from the Grade II* listed St Mary's Church or the Grade II listed St Martin's Church. The LVIA explicitly acknowledges Shotesham as a settlement from which visual effects are likely, yet contains no residential receptor viewpoint from within it. These are not matters of degree but of omission.

14.3 The combination of tracker panel orientation, bifacial reflectivity, panel height at maximum inclination, the acknowledged high landscape sensitivity of Site 8, and the complete absence of an assessed viewpoint from the Property represents an inadequate basis for the Examining Authority to conclude that harm to our amenity has been properly evaluated and mitigated.

14.4 We further submit that the ecological, botanical and hydrological assessments for Sites 7 and 8 contain serious deficiencies, that the heritage harm to the Shotesham Conservation Area and to the settings of the designated heritage assets at Hawes Green has been underestimated, and that the proposed AIL route through Saxlingham Nethergate — requiring demolition of an 18th century listed wall and encroachment on a Grade II listed war memorial — is wholly unacceptable.

14.5 We object because the Applicant has not shown that this harmful scheme is necessary, fairly consulted on, or environmentally acceptable in this location.

Stuart Shearer



Old Hall Barn, Hawes Green, Shotesham St Mary, Norfolk, NR15 1UW
10th September 2026

WRITTEN REPRESENTATION

East Pye Solar — Planning Inspectorate Reference EN0110014

To: The Examining Authority, The Planning Inspectorate

Submitted by: [Full names of both owners — insert before submitting]

Property: Old Hall Barn, Hawes Green, Shotesham St Mary, Norfolk, NR15 1UW

Interested Party Reference: [REDACTED]

Date: 1st October 2026

1. Introduction

1.1 This Written Representation is submitted by Stuart and Jane Shearer, the owners and occupiers of Old Hall Barn, Hawes Green, Shotesham St Mary, Norfolk, NR15 1UW (the Property). It expands upon our Relevant Representation submitted by email on 1st September 2026.

1.2 The Property is a Grade II listed residential barn conversion situated within the Shotesham Conservation Area in South Norfolk. Our principal outlook is to the south and south-east, across open agricultural countryside toward Saxlingham Nethergate and beyond. It is in this direction that Sub-Sites 7I, 7J, 7K, 7L (forming part of Site 7) and Sub-Sites 8A and 8B (Site 8) are located, at distances of approximately 930 metres to 2.5km from the Property as the crow flies.

1.3 The Property forms part of a tight-knit historic cluster on Hawes Green comprising three Grade II listed residential buildings — Old Hall Barn, Church View Barn, and Old Hall Farm — together with the Grade II* listed St Mary's Church (Historic England List Entry 1050642) and the Grade II listed medieval ruin of the Remains of the Church of St Martin (List Entry 1152468), situated approximately 100 metres from St Mary's.

1.4 We object to the Scheme as proposed and request that the Examining Authority carefully considers the matters set out below. We do not object to renewable energy in principle but submit that the Scheme as currently assessed and designed would cause significant and inadequately mitigated harm to the visual amenity, residential amenity, and heritage setting of the Property and the wider Hawes Green heritage cluster, and that this harm has not been properly evaluated in the Environmental Statement.

2. Visual Impact — Inadequate Assessment of the Property and Heritage Cluster as Receptors

Site 8 is the Highest Sensitivity Landscape Site in the Entire Scheme

2.1 Table 7.3 of ES Chapter 7 (APP/6.1.7, Revision 1, March 2026) confirms that Site 8 is assessed as High value, High susceptibility and High sensitivity — the only solar site in the entire 1,100 hectare scheme to receive this rating.

2.2 Table 7.5 of ES Chapter 7 further confirms that during construction, Site 8 is assessed as having a Moderate magnitude of effect resulting in a Major level of

significance and Significant adverse effect on landscape character — the highest construction-phase landscape impact rating of any solar site in the scheme.

2.3 Despite Site 8 receiving the highest possible landscape sensitivity rating and a Major Significant adverse construction effect by the Applicant's own assessment, no viewpoint has been assessed from the Property at Hawes Green, from St Mary's Church (Grade II*), or from St Martin's Church (Grade II). We submit this is a material and inexplicable omission.

The Residential Visual Amenity Assessment — A Critically Flawed Methodology That Excludes Hawes Green

2.4 ES Appendix 7.8 (APP/6.3.7.8, Revision 1, March 2026) presents the Residential Visual Amenity Assessment (RVAA) for the scheme. Having reviewed this document in detail, we have identified that the RVAA methodology has been specifically designed in a manner that excludes the Hawes Green heritage cluster from assessment entirely, and that this exclusion is not justified by reference to the characteristics of Site 8.

2.5 Paragraph 2.1.11 of the RVAA states that an initial desk-based study was carried out to identify residential properties within 500m of the maximum development parameters. Paragraph 2.1.13 then states:

“Properties within the 100m study area were individually numbered and assessed in accordance with RVAA methodology (Steps 2 and 3). Two properties out of twenty properties within this 100m area were found to meet the threshold for further RVAA assessment. Given the low likelihood of significant visual effects and the absence of other qualifying receptors within the 100m range, no further detailed assessment has been carried out on residential properties located beyond this 100m offset from the maximum development parameters.”

2.6 The Property at Hawes Green is located approximately 930 metres from Sub-Site 8B as the crow flies, with the nearest physical boundary of Sub-Site 8A along Market Lane only approximately 820 metres from the Property — just 320 metres beyond the 500m initial study area threshold, and well beyond the 100m detailed assessment area. The RVAA has been deliberately scoped to exclude the Hawes Green heritage cluster from any form of assessment.

2.7 The only property assessed for Site 8 in the entire RVAA is Dawsons Farm on Wash Lane, described as approximately 30m from Sub-Site 8A. No other receptor in the vicinity of Site 8 has been assessed in the RVAA, and no receptor at Hawes Green, at Shotesham St Mary, or in the Shotesham Conservation Area has been assessed at any stage.

2.8 The justification for restricting the study area to 500m is set out in RVAA paragraph 2.1.7, which cites TGN 2/19 as stating that development types including 'very large but lower profile structures' are 'unlikely to require RVAA, except potentially of properties in very close proximity (50-250m) to the development.' Paragraph 2.1.8 then classifies the scheme as falling within this category of 'very large but lower profile structures.'

2.9 We submit that this classification is wholly unjustified in respect of Site 8 specifically, for the following reasons:

- Site 8 is rated as High value, High susceptibility and High sensitivity by the Applicant's own assessment — the only solar site in the entire scheme to receive this rating. It is by definition not comparable to a standard large but lower profile development such as a road scheme or housing development for the purposes of scoping an RVAA study area.
- The scheme includes Single Axis Tracker Panels at a maximum height of 4.5 metres at greatest inclination. The TGN 2/19 guidance on very large but lower profile structures was not written with 4.5 metre rotating tracker panels in mind. Fixed panels at 2.5 to 3 metres might justify a 500m study area; 4.5 metre tracker panels oriented east toward an elevated receptor position do not.
- The cross-valley topography between Site 8 and Hawes Green means that distance does not provide the same screening protection it would for flat-ground development. The RVAA methodology assumes that proximity alone determines visual impact. At Hawes Green, at 38 metres AOD looking east across a valley floor at approximately 30 metres AOD where the nearest panels are located, the cross-valley elevated sightline creates direct visibility that flat-ground proximity assumptions do not account for. The 500m study area takes no account of this.
- The RVAA paragraph 2.1.13 reaches a pre-emptive conclusion — that there is a low likelihood of significant visual effects beyond 100m — without conducting any assessment of properties at greater distances. For Site 8, the highest sensitivity landscape site in the scheme with an elevated ridge position and cross-valley sightlines to properties at Hawes Green, this conclusion is an assertion unsupported by evidence.

2.10 We submit that the RVAA methodology for Site 8 is fundamentally flawed in its classification of the scheme as a 'very large but lower profile structure' justifying a 500m study area exclusion, and that the pre-emptive conclusion that there is a low likelihood of significant visual effects beyond 100m has been reached without any assessment of the specific topographical relationship between Site 8 and the Hawes Green heritage cluster.

Hawes Green is Entirely Absent from the Visual Assessment

2.11 Table 7.4 of ES Chapter 7 lists 21 separate viewpoints assessed for Sites 7 and 8 combined. Hawes Green does not appear as a named receptor or viewpoint location anywhere in the assessment.

2.12 The only assessed viewpoint in the vicinity of the Property is Site 7 VL11 — described as PRoW Shotesham FP21 — rated medium value, medium susceptibility and medium overall sensitivity. This is a public footpath assessment, not a residential receptor assessment, and does not represent the impact on the domestic curtilage and primary living outlook of the Property.

2.13 ES Chapter 7 paragraph 7.5.22 explicitly states that potential visual effects are likely to be experienced from 'settlement edges of... Shotesham' and from 'PRoW... around Shotesham'. Having acknowledged Shotesham as a settlement from which visual effects are likely, the Applicant has then failed to assess any residential

receptor viewpoint within Shotesham St Mary or Hawes Green. This is a direct internal inconsistency in the assessment.

2.14 ES Chapter 7 paragraph 7.7.14 confirms that solar PV panel development within Sub-Sites 8A and 8B has been excluded in proximity to residential properties on Market Lane, Wash Lane ‘and from Shotesham’. This acknowledgement that Shotesham is a sensitive residential receptor makes the absence of any viewpoint assessment from within the settlement even more inexplicable.

St Mary’s Church (Grade II*) and St Martin’s Church (Grade II)

2.15 St Mary’s Church, Shotesham St Mary is a Grade II* listed building — a designation held by only approximately 6% of listed buildings in England — with Historic England List Entry 1050642. The Remains of the Church of St Martin (List Entry 1152468) is a Grade II listed medieval ruin situated approximately 100 metres from St Mary’s. Neither building appears as a named viewpoint receptor in the visual assessment or in the RVAA.

2.16 An independent Landscape Architect commissioned by objectors has assessed the impact of Site 8 on the Shotesham Conservation Area and judged that this is a valued landscape and that the harm caused by the Scheme would be significant. We request that the Examining Authority gives full weight to this independent professional assessment alongside the Applicant’s own LVIA.

2.17 We submit that the LVIA and RVAA together contain the following material gaps directly relevant to the Property and the Hawes Green heritage cluster:

- No viewpoint assessment from Hawes Green or the Property, despite Shotesham being identified in paragraph 7.5.22 as a settlement from which visual effects are likely;
- No RVAA assessment from any property in the Shotesham Conservation Area, with the methodology having been scoped to exclude properties beyond 500m on grounds that are not justified for the highest sensitivity landscape site in the scheme;
- A pre-emptive conclusion in RVAA paragraph 2.1.13 that there is a low likelihood of significant visual effects beyond 100m, reached without any assessment of the specific topography, sightlines or heritage context of the Hawes Green cluster;
- No viewpoint assessment from or toward St Mary’s Church (Grade II*) or St Martin’s Church (Grade II); and
- No assessment of the impact of Site 8 on the Shotesham Conservation Area within the LVIA.

2.18 We submit that these gaps are material deficiencies in the environmental information before the Examining Authority, and that the examination should not conclude without the Applicant being required to address them.

3. Tracker Panels — Orientation, Height and Morning Visual Impact

3.1 Table 4.1 of ES Chapter 4 (APP/6.1.4) confirms that the Scheme is assessed under a Rochdale Envelope including Option A: Single-Axis Tracker Panels on all

Sites including Sites 7 and 8. ES Chapter 7 paragraph 7.4 confirms the visual assessment has been undertaken solely on the basis of Option A as the worst-case parameter. The ES confirms the following parameters:

- Maximum height at greatest inclination: 4.5 metres
- Maximum inclination: 60 degrees from horizontal
- Row alignment: north-south
- Tracking direction: east in the morning, west in the evening

3.2 During morning hours, tracker panels on Sites 7 and 8 would be inclined at up to 60 degrees facing east and north-east — directly toward the Property. At maximum inclination panels would reach 4.5 metres, significantly exceeding typical hedgerow height in this landscape and presenting their maximum surface area toward Hawes Green during the hours of day when residential amenity is most valued.

3.3 This is materially worse than a fixed south-facing installation, which would present only its edge profile toward the Property. Given that no viewpoint assessment has been conducted from the Property, there is no evidence that the LVIA or RVAA has assessed this morning-orientation tracker panel configuration from a residential receptor to the north-east of Sites 7 and 8.

3.4 The RVAA at paragraph 2.1.8 classifies the scheme as a ‘very large but lower profile structure’ to justify restricting the study area to 500m. This classification is inconsistent with 4.5 metre tracker panels that rotate to face residential receptors in the morning. The RVAA methodology fails to account for the dynamic orientation of tracker panels as a factor in determining appropriate study area extent.

4. Glint and Glare — Bifacial Tracker Panels

4.1 ES Chapter 4 confirms that all solar panels under the Scheme will be bifacial — meaning both front and rear faces are photovoltaic and reflective surfaces. Combined with tracker orientation, during morning hours the rear face of panels on Sites 7 and 8 would be angled toward the north-east, presenting a reflective surface directly toward the Property.

4.2 The Glint and Glare Assessment has been revised (AS-025 through AS-029, Revision 2). We request confirmation that the revised assessment has specifically assessed bifacial tracker panels in morning-east orientation toward residential receptors at Shotesham St Mary and Hawes Green, and that the Property has been considered as a sensitive receptor. If this assessment has not been undertaken for this receptor direction, we submit it represents a further material gap.

5. Panel Type Flexibility and Post-Consent Risk

5.1 The Rochdale Envelope approach means the Applicant retains flexibility to choose between tracker panels (Option A) and fixed panels (Option B) on each sub-site after consent is granted. There is no sub-site-specific commitment in APP/7.18 or the draft DCO to the use of fixed rather than tracker panels on the sub-sites closest to the Property.

5.2 We submit that the DCO requirements should include a condition restricting the use of tracker panels on sub-sites within a defined distance of residential properties and designated heritage assets, or alternatively requiring a further detailed assessment of panel type as part of the pre-commencement approval process for each sub-site.

6. Ecology — Barbastelle Bats and Shotesham Woods

6.1 Barbastelle bat activity has been specifically recorded in Shotesham woods, which are in close proximity to the Property. Barbastelle bats are a highly protected species dependent on connected dark landscapes and functional commuting and foraging habitat.

6.2 Multiple maternity colony core sustenance zones are understood to overlap Site 8 and its cable corridors. We submit that the ecological assessment has not adequately addressed the impact of Sites 7 and 8 on this nationally important bat population, and that Favourable Conservation Status cannot be guaranteed.

6.3 Peer-reviewed research indicates that bats confuse solar panels at horizontal orientation for water bodies, adversely affecting their ability to hunt. This specific risk to barbastelle populations using Shotesham woods has not been adequately assessed.

7. Ecology — White Clawed Crayfish and Aquatic Survey Methodology

7.1 Sites 7 and 8 are directly hydrologically connected to the Tas chalk stream. Norfolk Rivers Trust has survey results recording a breeding colony of White Clawed Crayfish in the Tas. We understand that East Pye Solar has erroneously stated that the Tas chalk stream is unlikely to support White Clawed Crayfish.

7.2 We further understand that aquatic surveys for the Scheme were carried out when streams and ditches were dry — a methodology that is unacceptable in a chalk stream catchment known to support this species. This represents a fundamental flaw in the ecological baseline for Sites 7 and 8.

8. Ecology — Rare Botany

8.1 Sites 7 and 8, along with their access routes and cable corridors, are understood to support rare assemblages of botany. A level 6 botanist has written formally to East Pye Solar stating that full season botanical surveys must be carried out before the project progresses further. We understand no such surveys have been undertaken.

8.2 This represents a material gap in the environmental assessment and we submit that the Scheme should not be consented before adequate botanical survey work has been completed and assessed.

9. Water Environment

9.1 Sites 7 and 8 sit within the highly sensitive Tas chalk stream and chalk aquifer catchment. We submit that impacts on private sewerage and hydrological

connectivity have not been assessed, and that insufficient hydrological and hydrogeological modelling has been carried out to ascertain the true impacts of the Scheme on this catchment.

9.2 We are particularly concerned about the proposal to drill under the Tas to link Sites 5 and 7, given the presence of White Clawed Crayfish and the sensitivity of the chalk stream ecosystem.

10. Heritage — Shotesham Conservation Area, St Mary's Church (Grade II*) and St Martin's Church (Grade II)

10.1 The Shotesham Conservation Area contains an exceptional cluster of designated heritage assets: three Grade II listed residential buildings at Hawes Green (Old Hall Barn, Church View Barn and Old Hall Farm), the Grade II* listed St Mary's Church (List Entry 1050642), and the Grade II listed medieval ruin of St Martin's Church (List Entry 1152468) approximately 100 metres distant.

Under Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, decision-makers must give special regard to the desirability of preserving listed buildings and their settings. The Court of Appeal confirmed in *Barnwell Manor Wind Energy Ltd v East Northamptonshire DC [2014]* that this duty requires decision-makers to give 'considerable importance and weight' to harm to listed buildings and their settings. This duty applies equally to NSIP decisions under the Planning Act 2008 and with even greater force to the Grade II* listed St Mary's Church. NPS EN-1 paragraph 5.8.6 further requires the Examining Authority to assess the significance of affected heritage assets and the contribution of their setting, and confirms that harm to the setting of a Grade II* listed building should be treated as exceptional. NPS EN-1 and NPS EN-3 together require wholly exceptional justification for harm to the setting of a Grade II* asset in an NSIP decision. The National Planning Policy Framework additionally requires clear and convincing justification for harm to Grade II* and Grade II listed buildings. None of these thresholds has been met in this application because the harm to the Hawes Green heritage cluster has not been properly assessed.

10.3 An independent Landscape Architect commissioned by objectors has assessed the impact of Site 8 on the Shotesham Conservation Area and judged that this is a valued landscape and that the harm caused by the Scheme would be significant. Over 300 Listed Buildings fall within the zone of influence of the Scheme, and the settings of multiple Listed Buildings in this area would be materially harmed.

10.4 Historic England, in their Section 56 Relevant Representation (EN0110014-000340), has raised concerns about cumulative heritage impacts and landscape sequences in the vicinity of Site 8. We submit that the Examining Authority should give considerable weight to the alignment between Historic England's formal concerns and the grounds raised in this Written Representation.

11. Construction Traffic — Abnormal Loads, Saxlingham Nethergate and Heritage Assets

11.1 The Outline Construction Traffic Management Plan (APP/7.6) identifies that Abnormal Indivisible Load (AIL) movements for the transformer serving Sub-Site 7F

will be routed via The Street, Saxlingham Nethergate. To accommodate these abnormal loads, which may be up to 5.5 metres wide, the 4.5 metre-wide street through the village would need to be widened.

11.2 The proposed widening would require the demolition of an 18th century wall at the Old Rectory and the expansion of the carriageway onto part of the triangular parcel of land on which Saxlingham Nethergate's Grade II listed war memorial stands. This is an extraordinary and wholly unacceptable proposal.

11.3 This directly contradicts the stated objective of the Outline CTMP that construction vehicle routes have been selected with the principal aim of avoiding routing vehicles through local villages, wherever practicable, including Saxlingham Nethergate.

11.4 Norfolk County Council as Highway Authority has formally recorded serious concerns about construction traffic management for this scheme, stating that inadequate engagement to date could lead to unsuitable roads being used for construction traffic. The AIL routing through Saxlingham Nethergate illustrates exactly this risk.

11.5 We request that the Examining Authority requires the Applicant to demonstrate that no viable alternative AIL route exists that avoids The Street in Saxlingham Nethergate and eliminates harm to the Grade II listed war memorial and the 18th century wall at the Old Rectory.

12. Property Value and Residential Amenity

12.1 The Property is a Grade II listed barn conversion whose value and amenity is directly connected to its open rural outlook to the south and south-east. The introduction of industrial-scale solar infrastructure across the countryside in this principal view direction would materially alter the character of that outlook.

12.2 The Applicant's own RVAA (APP/6.3.7.8) has excluded the Property from assessment on the basis that it lies beyond 500m from the maximum development parameters. We submit that this exclusion is unjustified given the High sensitivity landscape rating of Site 8, the 4.5 metre tracker panel height, and the elevated cross-valley topography that creates direct sightlines from the Property across the valley toward Site 8. The pre-emptive conclusion in RVAA paragraph 2.1.13 that there is a low likelihood of significant visual effects beyond 100m has been reached without any assessment of the specific characteristics of the Hawes Green heritage cluster.

13. Requests to the Examining Authority

We respectfully request that the Examining Authority:

- (a) Requires the Applicant to justify the restriction of the RVAA study area to 500m for Site 8, given that Site 8 is the only solar site in the scheme rated as High sensitivity landscape, that tracker panels reach 4.5 metres at greatest inclination, and that the cross-valley topography creates direct sightlines from elevated positions at Hawes Green toward Site 8 at distances beyond 500m;

- (b) Requires the Applicant to conduct a Residential Visual Amenity Assessment from the Hawes Green heritage cluster, applying the RVAA methodology of TGN 2/19, assessing the impact of Sub-Sites 8A and 8B in tracker panel configuration at maximum inclination (4.5 metres, 60 degrees, morning-east orientation) from the elevated ridge position at approximately 38 metres AOD;
- (c) Requires the Applicant to confirm whether the Property falls within the ZTV for Site 8 (Figure 7.5.4) and Site 7 (Figure 7.5.5) and, if so, to explain why it has not been assessed as a named receptor in either the LVIA or the RVAA;
- (d) Requires the Applicant to produce a viewpoint assessment and appropriate visualisation from the Property or from a representative location within the Shotesham St Mary / Hawes Green settlement, assessing the impact of Sub-Sites 7I, 7J, 7K, 7L, 8A and 8B in tracker panel worst-case configuration;
- (e) Requires the Applicant to produce a viewpoint assessment from or toward St Mary's Church (Grade II*, List Entry 1050642) and the Remains of St Martin's Church (Grade II, List Entry 1152468);
- (f) Requires the Applicant to confirm that the revised Glint and Glare Assessment (AS-025 through AS-029) has specifically assessed bifacial tracker panels in morning-east orientation toward residential receptors at Shotesham St Mary and Hawes Green;
- (g) Considers whether DCO requirements should restrict tracker panel use on sub-sites within a defined distance of designated heritage assets, or require sub-site-specific panel type approval;
- (h) Gives full weight to the independent Landscape Architect's assessment that harm to the Shotesham Conservation Area from Site 8 would be significant, and to Historic England's concerns about cumulative heritage impacts raised in their Section 56 Relevant Representation (EN0110014-000340);
- (i) Satisfies itself that the Section 66 duty has been discharged with considerable importance and weight in respect of St Mary's Church (Grade II*), that NPS EN-1 wholly exceptional justification has been provided, and that the NPPF clear and convincing justification test has been met;
- (j) Requires adequate full-season botanical surveys to be completed for Sites 7 and 8 before the examination concludes;
- (k) Requires further aquatic survey work for Sites 7 and 8 carried out under appropriate hydrological conditions;
- (l) Requires the Applicant to demonstrate that no viable alternative AIL route exists that avoids The Street in Saxlingham Nethergate and eliminates harm to the Grade II listed war memorial and the 18th century wall at the Old Rectory; and
- (m) Includes this Written Representation in the evidence considered at any Issue-Specific Hearing relating to landscape and visual impact, ecology, heritage and transport.

14. Conclusion

14.1 We do not object to renewable energy development in principle. We recognise the national importance of the energy transition.

14.2 The RVAA (APP/6.3.7.8) has restricted its study area to 500m, classifying the scheme as a 'very large but lower profile structure' and reaching a pre-emptive conclusion that there is a low likelihood of significant visual effects beyond 100m — without conducting any assessment of the specific topography, sightlines or heritage context of the Hawes Green cluster. For the only solar site in the scheme rated as High sensitivity landscape, with 4.5 metre tracker panels and direct cross-valley sightlines from an elevated heritage cluster at 38 metres AOD, this methodology is unjustified and the conclusion is unsupported by evidence.

14.3 The combination of the inadequate RVAA study area, the absence of any LVIA viewpoint from Hawes Green, the two material factual errors in ES Appendix 7.4 concerning Highfield House, the tracker panel orientation toward Hawes Green in morning hours, and the absence of any viewpoint from the Grade II* listed St Mary's Church represents an inadequate basis for the Examining Authority to conclude that harm to our heritage cluster has been properly evaluated and mitigated.

14.4 We further submit that the ecological, botanical and hydrological assessments for Sites 7 and 8 contain serious deficiencies, that the heritage harm to the Shotesham Conservation Area has been underestimated, and that the proposed AIL route through Saxlingham Nethergate is wholly unacceptable.

14.5 We object because the Applicant has not shown that this harmful scheme is necessary, fairly consulted on, or environmentally acceptable in this location.

Stuart & [REDACTED] Shearer

Old Hall Barn, Hawes Green, Shotesham St Mary, Norfolk, NR15 1UW

Signed

STUART SHEARER

[REDACTED]

[REDACTED] SHEARER

[REDACTED]

1st October 2026

