



The countryside charity
Norfolk

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Working locally and nationally to promote, protect and
enhance a beautiful and thriving countryside for everyone's benefit.

3rd October 2026

NSIP East Pye Solar – CPRE Norfolk Written Representation to Examination

Dear Planning Inspectorate,

CPRE Norfolk welcomes the opportunity to participate in the Examination of the East Pye Solar Development Consent Order (“DCO”) application.

We support the transition to renewable energy and recognise the urgent need to decarbonise electricity generation. However, support for renewable energy is not unconditional. Renewable energy development must be appropriately located and designed so that unacceptable harm is not caused to countryside, landscape character, tranquillity, agricultural land, heritage assets, public right of way and rural communities.

CPRE Norfolk considers that the East Pye Solar proposal would introduce infrastructure on an unprecedented scale into a large area of attractive and tranquil countryside in South Norfolk. The proposal extends across a dispersed network of sites stretching approximately 15km between Great Moulton/Tivetshall and Brooke/Seething and affects numerous communities throughout the Tas Valley and surrounding countryside.

While CPRE Norfolk supports the Government's net zero objectives, we object to the East Pye Solar proposal because the scheme would result in substantial environmental, landscape and community harm which, in our view, outweighs the benefits of the development when assessed against the planning balance required by the Planning Act 2008, the Energy National Policy Statements and relevant local and national planning policy.

CPRE Norfolk objects to the East Pye Solar proposal because its scale, dispersed nature and cumulative impacts would cause significant and long-lasting harm to the countryside that outweighs the benefits of the development.

Failure to Conserve and Enhance Landscape Character

The National Planning Policy Framework (NPPF) 2026 requires planning decisions to contribute to and enhance the natural and local environment, including by protecting valued landscapes, recognising the intrinsic character and beauty of the countryside.

The principal concern of CPRE Norfolk is the impact of the proposal upon the countryside.

While the NPPF supports renewable energy development, it also makes clear that proposals should be acceptable in planning terms and not result in unacceptable impacts. The scale and siting of the East Pye Solar Farm would result in significant harm to the open rural character of this part of Norfolk, contrary to these core principles.

The proposal would introduce an industrial-scale development into an open agricultural landscape, fundamentally altering its character.

The Landscape Character Assessment identifies a key landscape type relevant to the East Pye Solar proposal. The solar farm lies within the South Norfolk Claylands. Furthermore, the South Norfolk Local Landscape Designations Review (2012) classifies the landscape as Rural River Valley and Tributary Farmland Landscape Character types. Characterized by gently rolling farmland with open, expansive views, mature trees, scattered woodlands, and a patchwork of arable fields. The area has a rural, agricultural feel with a low density of settlements.

The proposed scale and extent of the solar array will create a significant alteration to the open rural character, especially from nearby public rights of way and minor roads. The large-scale installation of 4.5m solar panels across thousands of acres introduces an extensive, visually intrusive feature. The uniform, reflective nature of PV panels is incongruous with the more organic patterns of field and hedgerow found here. The reflective surfaces and the sheer extent of the development would contrast with the traditional farmland. This could significantly alter the sense of openness and rural tranquillity valued in the countryside.

The scheme would introduce solar arrays, substations, battery storage facilities, access roads, fencing and CCTV infrastructure across a dispersed network of sites stretching approximately 15 kilometres across South Norfolk for several decades.

Although the claim is these will be temporary, the reality is that this development would lead to these harms being felt for 40/60 years, plus the time taken to construct and decommission the site (if indeed it was decommissioned at that point.)

While the applicant proposes mitigation planting, CPRE Norfolk does not consider that screening can remove the landscape impacts of development on this scale. In many locations the proposed mitigation would itself result in the loss of valued open views and alter the character of public rights of way and rural lanes.

With regards to the visual impact of the scheme, we endorse comments and photos made and provided by Hempnall Parish Council.

CPRE's core purpose is to promote, protect and enhance the countryside for everyone's benefit. In CPRE Norfolk's view, the East Pye proposal is contrary to that objective because it would industrialise a substantial strip of open countryside and fundamentally alter the character of the Tas Valley and surrounding farmland landscapes.

Minimizing the importance of tranquillity

CPRE has long championed the protection of tranquillity as one of the defining qualities of the English countryside.

The development is situated within a landscape characterized by rural tranquillity. Much of the East Pye scheme area lies within countryside identified by CPRE as highly tranquil. These areas are valued because of their relative freedom from urbanising influences, artificial lighting, noise and large-scale infrastructure.

CPRE's Tranquillity Map, developed through research by Northumbria University, assesses areas based on factors such as naturalness, noise levels, and human activity. The map highlights regions where tranquillity is prevalent and those where it is diminished due to factors like infrastructure and urban development. While the most recent national tranquillity map was published in 2007, it provides valuable insights into the landscape context of proposed developments like the East Pye Solar Farm. The East Pye Solar Farm's location in South Norfolk District, falls within an area identified as having high tranquillity. This designation underscores the importance of the landscape for local communities and wildlife. The introduction of a large-scale solar farm in such a setting raises concerns about potential impacts on the area's tranquil character.

The development of the East Pye Solar Farm may introduce elements that could affect the area's tranquillity, including:

- Visual Intrusion: The presence of large solar panels, security fencing, and associated infrastructure could alter the open, rural vistas characteristic of the area.
- Noise: Operational sounds from the solar farm and associated facilities might introduce noise into an otherwise quiet environment.
- Light Pollution: Increased lighting for security and operational purposes could affect the natural night-time environment.

This stands in line with NPPF 2026 P3: Living conditions and pollution that relates to development being appropriate for its location, referring specifically to noise and light pollution and draws attention to intrinsically dark landscapes and nature conservation.

The introduction of solar infrastructure, substations, battery storage facilities, security fencing, CCTV systems, vehicle movements and lighting would erode these qualities and diminish the sense of tranquillity experienced by residents and visitors.

The applicant's treatment of tranquillity mapping does not accurately reflect CPRE's published evidence which misleads and understates the importance of tranquillity within the scheme area. For example, a large part of the scheme area is defined as most tranquil on the CPRE map this is not apparent on the

map supplied by the applicant. Comparing the two maps it becomes obvious the applicant's tranquillity map bears no resemblance to the genuine CPRE tranquillity map neither in terms of its colouration or key. Any further assessment must not be based on misleading and confusing documentation.

Inappropriate Use of Agricultural Land

CPRE Norfolk has longstanding concerns about the loss of agricultural land to large-scale solar development. The NPPF seeks to protect the best and most versatile agricultural land (Grades 1, 2 and 3a). Where such land is affected, applicants are expected to demonstrate that poorer quality land is unavailable and that the development is necessary in that location.

We are not satisfied that the application robustly justifies the use of productive agricultural land, nor that alternative locations, such as previously developed land, commercial rooftops, car parks, or less sensitive sites, have been properly explored.

Recent studies, including by SolarQ UK, show that the UK's solar targets can be met without sacrificing productive farmland, by prioritising rooftops, car parks, and brownfield sites. The developer has not justified why these alternatives have been dismissed.

The way forward must be based on the potential to harness technological advances in solar energy production which have minimal impacts on the landscape. It will become possible to "harvest" solar power from all manner of artificial surfaces including road surfaces, warehouse and factory roofs etc and these methodological breakthroughs, together with other new approaches such as producing hydrogen from plastic waste, will ultimately make farmland consuming, landscape destroying commercial photovoltaic solar farms redundant. CPRE Norfolk wants to see more effort, ingenuity and resources put into these new methods of producing renewable energy and, once again, when and where possible, with maximum input from the local community. Research carried out by the UCL Energy Institute for CPRE confirmed that installing solar panels on existing rooftops and other land such as car parks could provide at least 40-50GW of solar energy in England by 2035 and by 2050, with further investment, that there is potential to generate 117GW of low carbon electricity from roofs and other developed spaces - i.e. well in excess of the government's 2035 national target.

Understating the impact on heritage and conservation Areas

The proposal would affect the setting of numerous heritage assets and conservation areas located within the wider landscape.

Conservation areas such as Saxlingham Green and Fritton derive much of their significance from their relationship with the surrounding rural landscape. Industrialisation of that landscape inevitably affects their setting and character.

CPRE Norfolk supports concerns raised by local authorities, parish councils and community organisations regarding the cumulative effect of the proposal on heritage assets across the scheme area.

Diminishing the impact on Public Rights of Way

The affected countryside contains a well-used network of public rights of way enjoyed by walkers,

cyclists, horse riders and local residents.

CPRE Norfolk is concerned that the proposal would diminish the recreational experience available on these routes through visual intrusion, loss of openness, extensive mitigation planting and the introduction of security infrastructure.

No robust Landscape and Visual Impact Assessment (LVIA) appears to accompany the proposal, and any claimed mitigation through screening or planting is unlikely to reduce the visual harm during the 40/60-year operational period. Furthermore, much of the mitigation on offer, e.g. planting hedgerows, would destroy current open attractive views along footpaths and minor roads.

The NPPF 2026 requires public rights of way to be protected and enhanced. We do not consider that this objective would be achieved by the East Pye proposal.

Indifference to cumulative impacts

East Pye cannot be considered in isolation. South Norfolk is already experiencing increasing pressure from solar farms, battery storage facilities, electricity transmission projects, substations and other major energy infrastructure proposals.

CPRE Norfolk considers that the cumulative effect of these developments risks transforming the character of large areas of rural South Norfolk and progressively industrialising the countryside.

In addition, the Applicant's cumulative assessment does not adequately reflect the wider context of energy infrastructure development across the district nor the cumulative impact of East Pye's multiple dispersed sites. In particular the social-economic impact the scheme has on the 20 plus local villages and communities that live next to the proposed scheme.

Uncertain Decommissioning and Land Restoration Strategy

National policy stresses the importance of temporary and reversible use of land for solar development. However, the proposal lacks a clear decommissioning plan, long-term land stewardship strategy, or legally enforceable mechanism to ensure restoration of land to its former agricultural use after the project's lifespan.

Conclusion

CPRE Norfolk welcomes the expansion of renewable energy but stress the importance of scale, siting, and landscape sensitivity. We want to see new renewable energy projects done well, in a way that minimises impacts on the Norfolk countryside. This proposal fails on all three counts.

This proposal would introduce industrial-scale infrastructure into a rural, visually sensitive setting, resulting in significant and irreversible landscape harm.

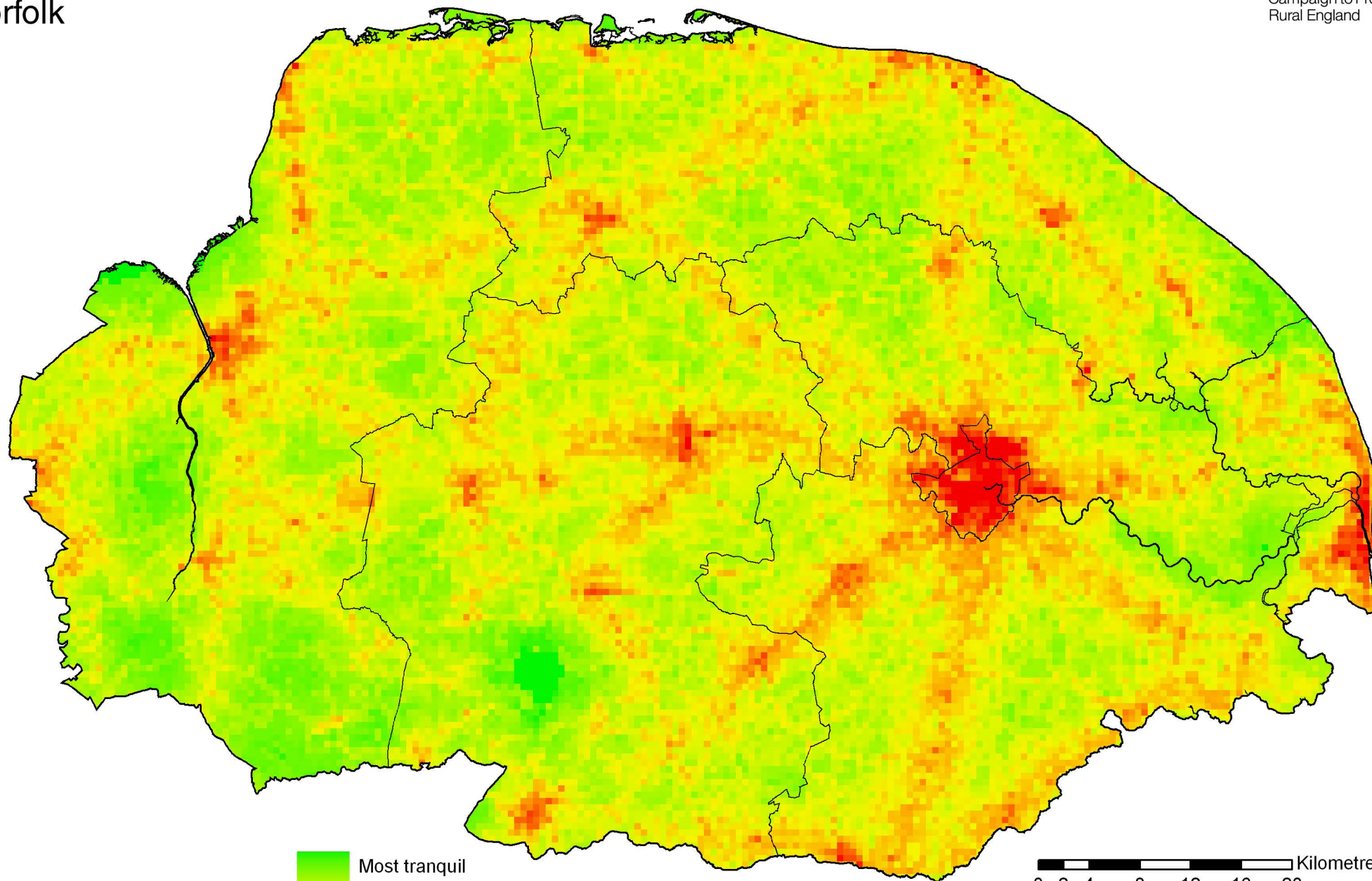
The proposal is inconsistent with the objectives of national and local planning policy, which seek to

protect distinctive landscapes, support sustainable rural communities, and direct inappropriate development away from the open countryside.

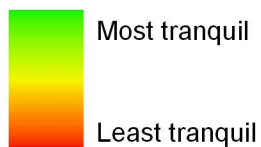
CPRE Norfolk therefore concludes that the adverse impacts of the scheme outweigh its benefits and respectfully requests that the Examining Authority recommend refusal of the Development Consent Order.

Yours sincerely,
CPRE Norfolk

Tranquillity map: Norfolk



Reproduced courtesy of the
Campaign to Protect Rural England.
Revised edition 2007.



0 2 4 8 12 16 20 Kilometres

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The Countryside Agency 2006. 100018881.

To whom it may concern- Re: East Pye NSIP Mega Solar application documents- Key DCO documents. APP-083 6.2.7.8 Environmental Statement Volume 2: Figure 7.8 CPRE England's Tranquillity Plan.

Background note

My name is [REDACTED] I am a policy lead working on land use, farming and environmental land management. I have worked on tranquillity at Campaign to Protect Rural England (CPRE) since 2006. I worked with the research team led by Northumbria University to make the 2007 national tranquillity mapping GIS data set freely available under licence – as well as publishing the underlying methodology- to support the analysis of tranquillity for a wide range of development and research projects. The GIS dataset has since been licensed for use some 140 times to bodies ranging from Government departments, Local authorities to environmental consultancies and academic and other research organisations. In particular, I prepared the licence for the use of the data set to Stantec on 15 September 2025 as I understand it for the preparation of the Environmental Statement for this application.

[REDACTED] of CPRE Norfolk brought the map submitted above as part of the application to my attention. I have compared the map as presented with the 2007 National Tranquillity map published by CPRE based on the same 2007 GIS data set as used in this instance in particular the more granular county map of Norfolk produced by Northumbria University and also published by CPRE in 2007. This the county and covers the area shown in Figure 7.8.

I wish to make the following observations:

Map title

The title refers to CPRE England's Tranquillity Plan. This should not be interpreted as a map created by CPRE or solely for CPRE. The GIS licence agreement makes clear in **Guidance for use of the data (ii) Interpretation** that “The findings of this research are the results of an independent study” The licensing of data is managed by CPRE for CPRE, Natural England and Northumbria University all of which hold joint intellectual property rights. The legend on the map makes it clear this map was developed for CPRE and Natural England by Northumbria University and is correct and is as required by the licence agreement. Natural England subsequently used the 2007 tranquillity mapping data extensively for assessing tranquillity as an experiential quality in their National Character Area analysis.

Map colour scale

The colour scale on Figure 78 has been altered from the red (least tranquil via orange to yellow as the mid-point to light then deeper green (most tranquil) as used in the original 2007 output maps. The original mapping used colours that are bright and provide a strong contrast so that areas of low tranquillity are immediately visible as are those of the higher to highest tranquillity. The 500m by 500m output squares are on the Norfolk county map visible despite the relatively low granularity. The original mapping makes it possible to see at a glance the line of main and lesser roads as well as large

and smaller settlements in the change of colouration to yellow/orange/red as they are key influences on the tranquillity scores.

There may be legitimate reasons for the change of colour scale but no explanation has been given on figure 7.8. This may be provided elsewhere. The colour scale chosen runs from deep purple (least tranquil) through blue at the mid-point to blue/green, light green then yellow (most tranquil). The colour palette is very muted- not bright- and it is much more difficult to see contrast: the purple of low tranquillity areas alters to blue at the mid-point. Purple and blue are close to each other in the colour wheel so there is limited transition in colour and reduced contrast even between areas of negative tranquillity and those with relatively high tranquillity. Also, the green of the more tranquil areas fails to contrast strongly with the blue of more neutral areas as blue and green as colours are close to each other on the colour wheel. Again, this reduces contrast and clarity. Areas of high tranquillity appear as lighter to darker green on the 2007 Norfolk county map but do not appear here at all in the yellower end of the spectrum on the new colour scale, which is surprising.

I note also that in the key the dotted bars denote the 'range of tranquillity in the search area' but do not seem to include the lighter green 500mx500m squares both within the red overlay or beyond it within the blue dotted lines.

I also observe that the overlay in heavy red with numbering in conjunction with the marked loss of contrast and clarity makes it difficult to interpret what the underlying colour to each square of the development footprint might be.

The last point I wish to make on the colour scale chosen is to mention the excellent and highly detailed work done by Land Use Consultants most recently for Natural Resources Wales on mapping aspects tranquillity across the country: [REDACTED] / Land Use Consultants, [REDACTED] 2022, Cyfoeth Naturiol Cymru/Natural Resources Wales. This work includes a range of maps with different colour scales, that is they do not use the 2007 England tranquillity mapping red/green colours and indicates what should be possible. I would argue that they successfully use strong contrasting colour from black to yellow to provide clear mapping even at a national scale – see for example figures 46,49 , 50 and 51.

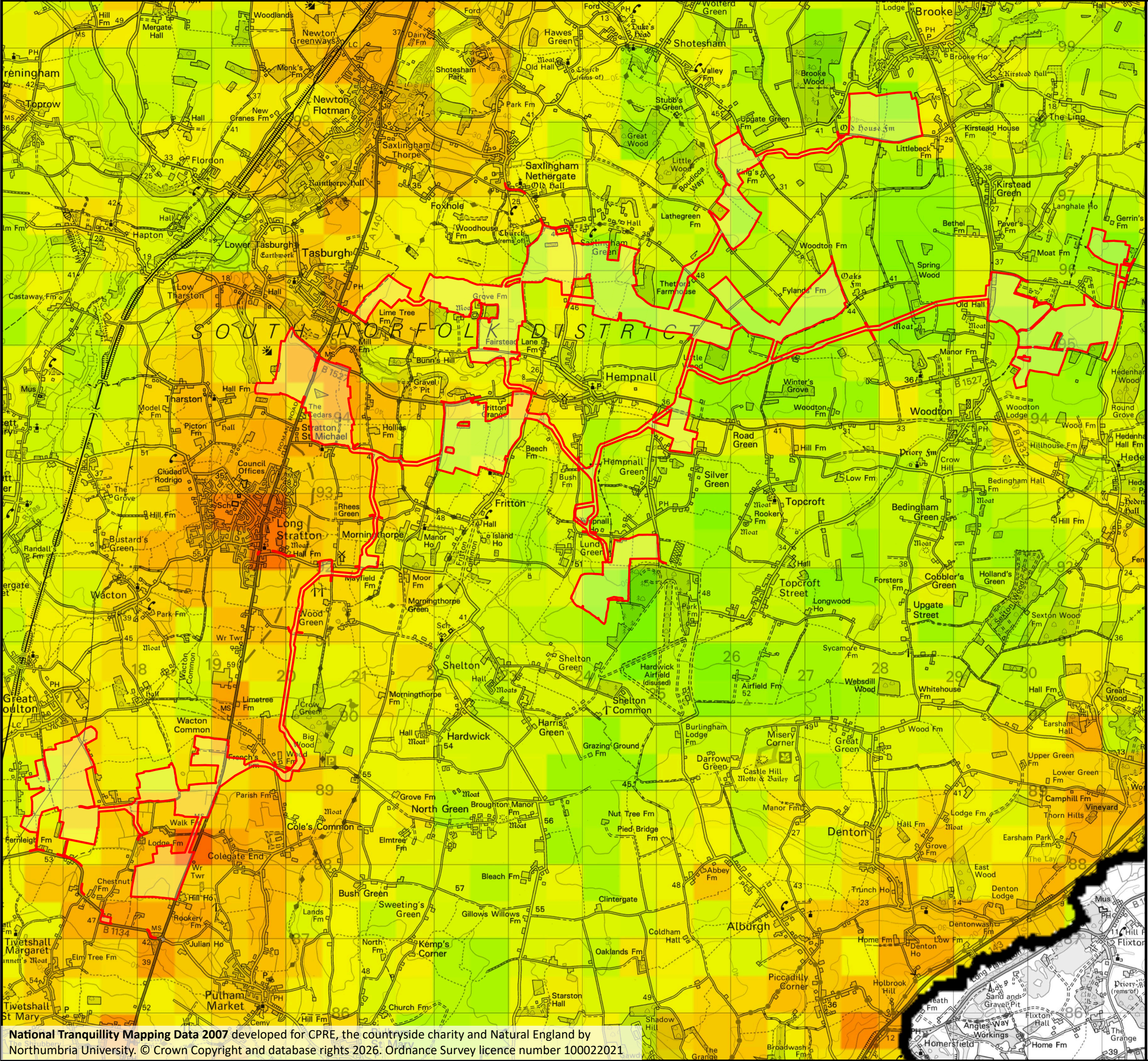
Concluding comments

I believe the map presented in figure 7.8 is difficult to interpret if it is meant to aid the assessment of tranquillity underlying the development footprint and beyond. This is so even with the limited amount of information presented –for example, there is only a very faint underlay of roads that are visible on magnification. This is primarily due to the colour choice and lack of colour contrast. .

While the 2007 maps published by CPRE were at the time left deliberately simple – the choice was made not to include underlying roads, urban outlines, infrastructure. Even when such features are added back to the mapping in detail, as is perfectly possible, the colouration of the output squares on the tranquillity square is I would argue very clear.

[REDACTED]

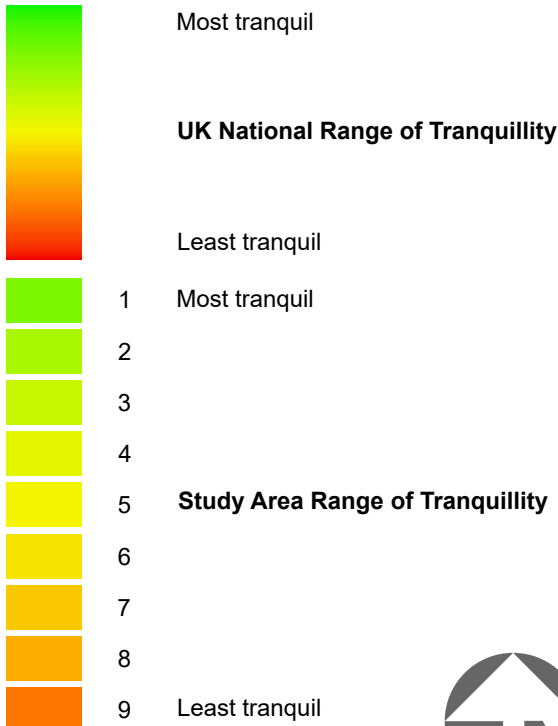
9 June 2026



Notes:

 Solar Farm Development

Tranquillity Key:



Scale: 1:50,000 Sheet Size: A3 Lscp
Drawn: HC Checked: BB
Date: Sep 2026 Revision: -
Filename: HPC-App07-Fig02-Tranquillity.pdf

Project:
East Pye Solar
Client:
Hempnall Parish Council
Drawing:
CPRE Tranquillity Mapping