

Submission ID: SBCAF9C09

I haven't completed by written representation - but will be able to forward at a later date

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I attach a copy of my relevant representation

Sandra Mullett from GREAT MOULTON

My husband myself and my mum moved to South Norfolk about 11 years ago, we didn't realise what an amazing area we had chosen to retire to.

Great Moulton was probably settled in the Saxon times. The earliest mention of the village appears in historical documents back in 1035 and also recorded in the Domesday Book of 1086. Even now we have no form of industry, just farming. It is such a quiet, tranquil village, with the darkest of skies. Even East Pye state in their documents that Great Moulton village is one of the quietest in the scheme,

Myself and so many people walk, ride horses and bike the footpaths and byways that criss cross around this 240 acres which is part of The Great Moulton Plateau. This area has remained unchanged for hundreds of years, the tranquillity and peace of mind that being in this far-reaching landscape brings, is calming and creates a sense of wellbeing. Also as part of this landscape is HUNDRED LANE a historic Right of Way, with

many mentions in the Domesday book, when you walk along it, you are aware of the history that precedes us.

But if, and when East Pye build this, Great Moulton's residents are being targeted with the most unimaginable industrialisation, 3 substations, a BESS and fields of 4.5m high tracking panels, also the planned 2-way haul roads which will cross Hundred Lane for the development of this project,

The area proposed is more than **FOUR TIMES THE** size of the village.

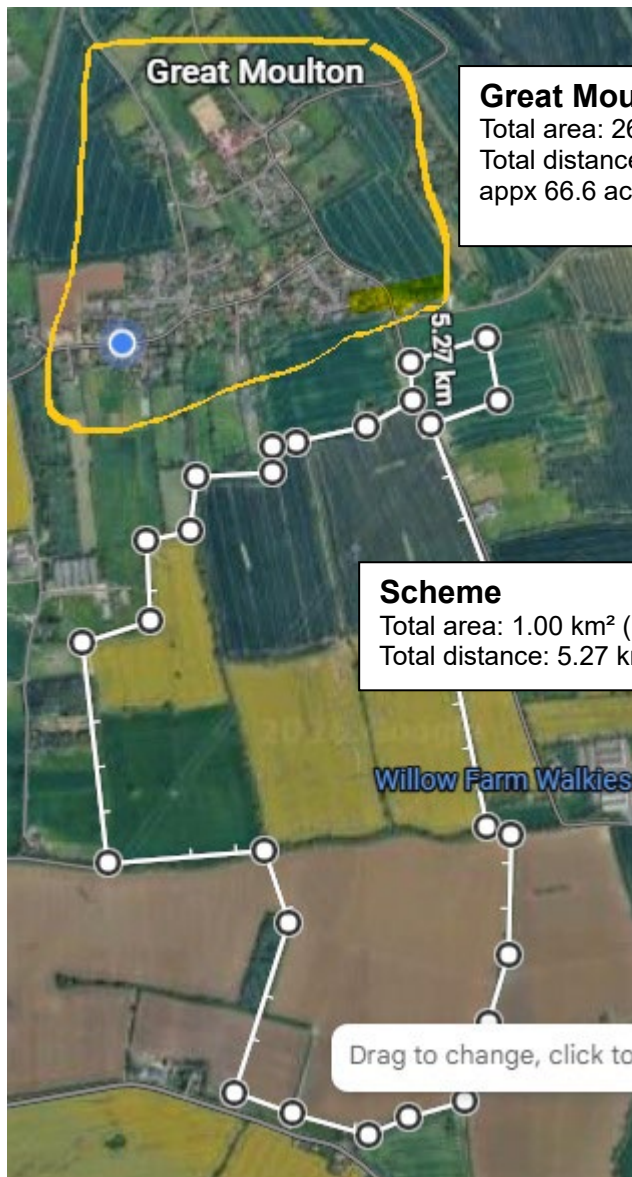
I have been living with the proposed scheme for two years now and when I walk through my village, I am fearful of what it will become, we will lose everything we hold precious, the anxiety and stress is unquantifiable.

East Pye has only developed outline plans for all the major infrastructures, everything is hidden in a Rochdale Envelope and the National Grid POC leaves me cold, we have no idea of what to expect, all I can see is Norwich Main in my head and the destruction this will bring.

The lack of empathy and concern by East Pye is astounding, they place two substations (one of which is over 6ha), within 25m of people's homes and don't consider the implications for the community, and it seems that every document and map has basically airbrushed Great Moulton Out.

We as members of this village need to be considered and not just walked all over to achieve a government target.

I would ask if we have clean air, which is cited as a need for all, why must ours be destroyed to accommodate people who have no care for others and certainly not for the countryside we live in.



Great Moulton

Great Moulton :

Total area: 269,931.53 m² (2,905,518.77 ft²)

Total distance: 2.34 km (1.46 mi)

appx 66.6 acres

Scheme

Total area: 1.00 km² (10,811,059.86 ft²)

Total distance: 5.27 km (3.27 mi) appx 248 acres

Willow Farm Walkies

Drag to change, click to

Sandra Mullett from GREAT MOULTON

Great Moulton was settled in the Saxon times. The earliest mention of the village appears back in 1035 and recorded in the Domesday Book of 1086. Even now our village is still a rural farming community.

The village is a quite tranquil place with the darkest of skies. East Pye state in their documents that Great Moulton is one of the quietest in the scheme and as stated by one of our residents he has recorded 2000 birdsongs of which 24 are on the Red LIST (he told me after that most of them are recorded around the main point of connection site 1B)

The tranquillity and peace of mind that being in this far-reaching landscape brings is calming and creates a sense of well-being.

Great Moulton residents are being targeted with the most unimaginable burden, three substations, a BESS and fields of 4.5m high tracking panels, also the planned 2-way haul roads which will cross Hundred Lane for the development of this project,

The area proposed is more than FOUR TIMES THE size of the village.

The village as not part of the initial scheme, only the loss of the connection at Norwich Main then bought East Pye to our village, we were not meant to be “the hub” and if the Horlock rules had been followed, this site would have been deemed unsuitable.

East Pye is using the **Rochdale Envelope**. My concern is not that they are using it, but **how much flexibility is being left open and whether the significant constraints have actually been clearly assessed and secured.**

As I understand it, the Rochdale Envelope is supposed to assess a realistic, worst-case assessment. It should not mean

that an inadequate description of what may be built or too much detail is left undecided until after consent has been granted.

Could the Examining Authority request a clear schedule showing what is still flexible, the maximum limits that have been assessed, worse-case position and where those limits are secured in the DCO.

Residents also need one clear and easy-to-read plan showing **how close the National Grid Substation and associated infrastructure could come to the nearest homes and to Narrow Gate Lane**. We should not have to rely on being told what is *likely* to be built. **We need to know what will be built if consent is granted.**

I also asked East Pye to visit Great Moulton and look at these proposals **on the ground with us**, but that request was declined.

A consultation meeting in a hall is not the same, as standing beside the homes affected, Narrow Gate Lane and other public rights of way and seeing for themselves how this development would sit in the landscape.

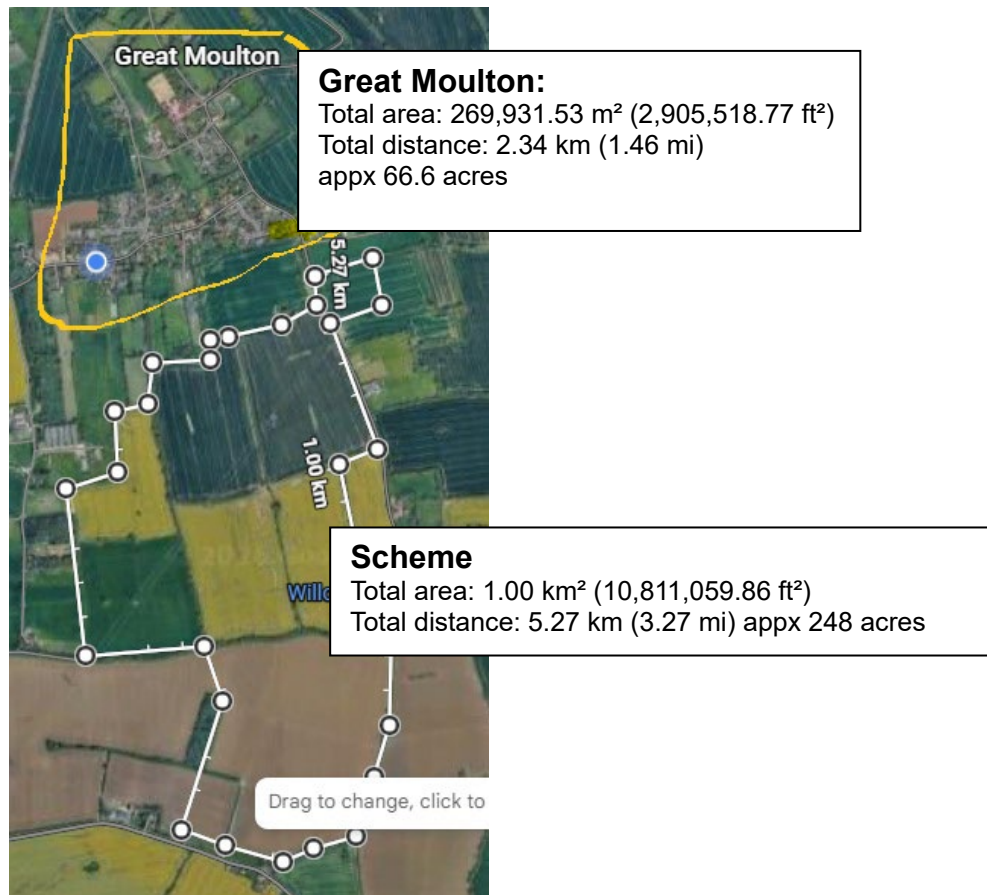
We understand that visits have taken place elsewhere, so we would simply ask **why Great Moulton not given the same consideration.**

Finally, those of us who chose to live in Great Moulton understand that rural life comes with inconveniences. We accept those because we value the peace, open countryside, dark skies and character of the area.

What we did not choose was to live beside a concentration of major energy infrastructure.

The question is whether this level of permanent industrial development is acceptable in this rural landscape at all.

I object in full to The East Pye Proposal



LIST OF ISSUE-SPECIFIC QUESTIONS – SUBMISSION REFERENCE SBCAF9C09

DCO – Fire Safety and BESS Emergency Access

1. **East Pye has not omitted emergency access from its safety case.** The documents submitted state emergency vehicles should be able to reach the BESS from the highway from two different routes and move around the within compound. The points for the Examination is whether these two routes are clearly shown, genuinely independent and secured for the full life of the BESS.
2. Before consent is granted the Applicant should identify on a single plan:
 - a. The exact two Fire and Rescue Service access points to be used including the route from the public highway approach, and how either route would remain open if the other is blocked by fire, smoke, accident or other obstruction.
 - b. Whether the draft DCO will be amended or clarified so that two genuinely independent, all-weather emergency routes are provided and maintained throughout the operation, including any necessary repairs.
 - c. How do the two proposed emergency approaches match the access points shown in the Transport Assessment, Outline CTMP, Outline OTMP and DCO access plans, particularly A02 and the other access for Site 1.

Landscape Permanence & Decommissioning

1. **Permanent National Grid infrastructure**

The Applicant repeatedly describes the East Pye Scheme as temporary and reversible, However, its own ES Chapter 4 says that, once the 60-year operation and maintenance period ends, the National Grid Substation and Grid Connection Infrastructure would remain in place, with National Grid responsible for their continuing maintenance and management

 - 1.1 Will the Applicant together with NGET confirm how long the retained 400Kv National Grid Substation and Infrastructure are expected to remain outside this DCO?.
 - 1.2 If there is no secured end date will the Applicant confirm that, for this DCO the retained substation and infrastructure should be treated as a permanent feature in Great Moulton, rather than something that will be reversed at Year 60?

Evidence: APP/6.1.4 ES Chapter 4, paras 4.6.3-4.6.5; APP/6.4 Non-Technical Summary, paras 4.5.2-4.5.3.

2. **Temporary assessment versus permanent landscape change**

The different matters. The BESS, solar arrays and Project Substations are proposed to be removed at decommissioning, whereas the National Grid Substation and Grid Connection Infrastructure are expressly stated to remain. The landscape assessment therefore needs to separate the temporary effects of this 60-year scheme from the potentially permanent effects of the infrastructure left behind.

- 2.1 Can the Applicant confirm how the permanent effects have not been understood by describing the wider scheme as temporary and reversible, when in fact a major part of the Great Moulton Infrastructure cluster will remain?
- 2.2 Where is the landscape and visual assessment for the period after Year 60, looking specifically at the National Grid Substation and Grid Connection Infrastructure once the solar and BESS elements have been removed?
- 2.3 Which landscape mitigation measures would pass NGET, for how long would they be maintained, and what controls make sure that the permanent substation remains properly screened if the surrounding solar-scheme mitigation is removed or changed?

3. Hundred Lane/RB19 – Permanent Haul Route and Maintenance Crossing

3.1 Why is a new permanent crossing needed?

The access history needs a clear explanation. At the PEIR stage, East Pye said access to the Sub-Site 1B Option 4B substation via the BESS Site, Station Road, Lodge Road and Frith Way. The final operational access schedule still lists A03 on Frith Way as an existing construction-and-operational access serving Sub-Sites 1A, 1B and 1D. The Transport Assessment also states that existing agricultural accesses are used where possible, with widening or formalisation where necessary.

- i. What changed between the PEIR access strategy and the final DCO design to make a permanent engineered crossing of Hundred Lane/RB19 is now necessary?
- ii. Why can A03/Frith Way and the previously identified Lodge Road/Frith Way arrangement not meet the operational needs, whether by continued use, adaptation or shared accesses?
- i. What alternatives were considered specifically for the Hundred Lane crossing, and where is the comparison showing that reasonable alternatives would not avoid or materially reduce the acknowledged Significant harm to RB19?
- iii. When was the permanent Hundred Lane crossing first added into the Scheme design, and where and when were affected residents and users of RB19 clearly consulted about the haul-route crossing remaining as permanent maintenance access?

Evidence: APP/7.20 Site Selection Assessment, para 3.5.23; APP/7.7 Outline OTMP, Table 2.2; APP/6.3.11.1 Transport Assessment, paras 4.3.1-4.3.4 and Table 4.1; APP/7.6 Outline CTMP; APP/6.3.7.9 PRoW Visual Amenity Assessment.

3.2 What is the permanent crossing actually required to serve?

Which asset needs permanent maintenance access, and for how long? Please clarify whether the crossing is for the BESS, Project Substations, National Grid Substation, overhead-line works, emergency access, general maintenance, or a combination of these.

- 3.1 If the crossing is needed only for infrastructure is removed at Year 60, will the Applicant commit to removing the crossing and fully restoring Hundred Lane/RB19 at decommissioning?

3.2 If the crossing is intended to remain after Year 60 to serve the National Grid Substation or Grid Connection Infrastructure, **why is that potentially indefinite effect not been clearly identified and assessed as permanent infrastructure associated with the retained transmission asset?**

Evidence: APP/6.3.7.9 PRoW Visual Amenity Assessment - Great Moulton RB19; APP/6.1.4 ES Chapter 4.

3.3 Permanent Harm

It is not suggested that unrestricted heavy construction traffic should simply be diverted onto Frith Way or Lodge Road. The main issue is that a permanent engineered crossing of a historic Restricted Byway, with Significant adverse effects acknowledged by the Applicant, needs a clear case showing why it is necessary and what alternatives were considered. It should not be accepted merely because it is convenient if existing access arrangements can reasonably do the same function with less permanent harm.

Before the Hundred Lane crossing be authorised as a permanent infrastructure, The Applicant should set out why it is operationally necessity, the vehicle types, likely frequency of use, exact width and surfacing, and why the same function cannot be achieved through existing access points?

Requested Clarification from the Examining Authority:

I would respectively ask the Examining Authority to require the Applicant and NGET where appropriate, to provide a coordinated answer to the following:

- 1 Confirm how long the National Grid Substation and Grid Connection Infrastructure are expected to remain and what decommissioning arrangements apply?
- 2 Identify which roads, access tracks, crossings, drainage works, security and landscape mitigation measures will remain after the 60 year solar/BESS scheme is decommissioned.
- 3 Confirm whether the Hundred Lane crossing will be after 60 years, or kept to serve the National Grid Substation indefinitely?
- 4 Provide the specific need and alternative case for the permanent Hundred Lane crossing, including comparison with A03/Frith Way and the earlier Lodge Road/Frith Way access strategy.
- 5 Clarify when the permanent Hundred Lane Crossing was introduced and how people were consulted about that permanent change.
- 6 Ensure the DCO and approved plans clearly secure any permanent access and fire safety requirements relied upon to demonstrate the scheme is safe and deliverable.

The Great Moulton cluster should not be treated as entirely temporary and reversible when the Applicant has confirmed that major transmission infrastructure will remain. In the same way, a permanent crossing of Hundred Lane/RB19 should not be approved

without a clear explanation of why it is needed, how long it would remain, what alternatives were considered, how it was consulted on, and how it relates to the retained National Grid infrastructure.

Principal East Pye Documents Referenced

APP/3.1 Draft Development Consent Order; APP/6.1.4 ES Chapter 4 - The Scheme; APP/6.1.11 ES Chapter 11 - Transport and Access; APP/6.3.7.9 PRow Visual Amenity Assessment; APP/6.3.11.1 Transport Assessment; APP/6.4 Environmental Statement Non-Technical Summary; APP/7.5 Outline Battery Safety Management Plan; APP/7.6 Outline Construction Traffic Management Plan; APP/7.7 Outline Operational Traffic Management Plan; APP/7.8 Outline PRow and Permissive Paths Management Plan; APP/7.20 Site Selection Assessment.