

Written Representation Summary – Hedenham Parish

Introduction

The attached report (*“Observations & Objections submitted in response to East Pye Solar Farm Site 10 proposal”*) was initially compiled by Hedenham Parish representatives at the request of Block East Pye Solar (BEPS). It was first prepared in March 2026 as part of a Site by Site review of the East Pye Scheme proposals with the different parishes impacted by the Scheme focusing on the Scheme site(s) most relevant to them.

Hedenham Parish lies at the eastern extreme of the Scheme with Site 10 (comprising sub-Sites 10A through 10E) on our northern boundary. In their recent submissions, the contents of which we wholly endorse, BEPS have comprehensively covered the environmental, social, economic and heritage impacts of the Scheme as a whole. This document is focused on those issues that, in the context of the many and wide-ranging impacts of the Scheme, are considered to be of particular significance and perhaps uniqueness to Site 10.

The original report has recently been updated for the purposes of this Written Representation to incorporate appropriate additional information and amendments arising from the Open Floor and Issue Specific Hearings held at Dunston Hall on 15th, 16th and 17th September 2026.

Key matters

Key matters covered in this Report include the impact of the Scheme on :

- Maternity Colonies of Barbastelle bats present in nearby ancient woods
- Run-off water management in and around the village of Woodton which already has a history of flooding
- The Conservation Area designation of both Hedenham and Seething villages
- Seething Airfield, home to an American Bomber base during the second world war and now home to the Waveney Valley Flying Club with particular concerns with regard to the Airfield safety zones
- The local road network with its narrow rural lanes notably during the construction phase
- The suitability of designated Site Access points onto Site 10 and inter-Site access points
- Public rights of way and other local road users
- Local businesses and tourism
- Light pollution and its consequences for the Seething Observatory of the Norwich Astronomical Society’.

Conclusion

The report concludes that the proposed location of Site 10 of the East Pye Scheme is unsuitable and indeed potentially dangerous. As a result, the inclusion of Site 10 within the Scheme should be rejected due to:

1. The safety concerns around sub-site 10B intruding into the Seething Airfield Public Safety Zone which concerns are not being mitigated in the proposed Scheme design even after the changes to their original plans recently introduced by East Pye.
2. The anticipated impact on wildlife, not just the resident Barbastelle bats maternity colonies but also other wildlife that currently roams the surrounding area and flourishes in the local woodlands and hedgerows. The adverse effects on the local Barbastelle population's favourable conservation status are not capable of mitigation, and the Scheme is fundamentally incompatible with the Habitats Regulations.
3. The location of Site 10 sitting directly between two Conservation Areas in Seething and Hedenham would damage the rural environment for the long term negating and wholly contradicting the reasons for and purpose of these Conservation Areas.
4. Sub-site 10E is immaterial to the potential solar generation value of the Scheme and coupled with the additional construction disruption, cost, environmental damage and industrial sprawl that it would introduce are reasons why it should be removed from the Scheme.
5. Sub-site 10A has no acceptable access route and should be removed from the Scheme.
6. There are no documented provisions to manage the run-off water from Site 10 and the flooding risk it poses to Woodton village which already has existing flooding problems.
7. Local businesses, notably those associated with South Norfolk's important tourism industry, will be severely and detrimentally impacted both during the Scheme's construction phase and throughout the operational phase of the Scheme. There are no specific proposals for appropriately compensating these businesses nor indeed for homeowners who are likely to find their properties both devalued and considerably more difficult to sell.

Notwithstanding the specific concerns discussed in this report in respect of Site 10 of the East Pye Solar Scheme, it should be emphasised that the residents of Hedenham Parish fundamentally object to the Scheme as a whole. The reasons for this rejection of the proposals have been highlighted in submissions by Block East Pye Solar (BEPS), the Relevant Representation previously submitted on behalf of Hedenham Parish in June 2026 and in the numerous Relevant Registrations also submitted in June 2026 by South Norfolk residents and others including residents of this Parish.

**Observations & Objections submitted in
response to East Pye Solar Farm Site 10 proposal**

Hedenham Parish Meeting
Updated October 2026

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1. Introduction

The East Pye Solar farm (“the Scheme”), if developed, would almost certainly impose the largest and most dramatic change of modern times to the South Norfolk countryside and to the lives of those who reside here. The ‘mega solar farm’ Scheme as proposed would cover more than 2,200 hectares and stretch up to 15km from West to East. It is of a size and nature that is wholly out of proportion and character to our tranquil rural countryside and would impose a scale of industrialisation that the local resident population should not be required to accommodate. A clear majority of those residing in South Norfolk oppose the Scheme which delivers minimal, in any, specific benefits for the local population as part compensation for the detrimental impact that it will have on their lives now and for at least a further two generations. Commitments by the developers that the countryside will be largely restored to its current state at the end of the Scheme’s useful life, some 60 years hence, are hard to take seriously and offer no comfort. It is almost certain that the developers will no longer still own the Scheme, fields of solar panels will long have come to represent redundant, obsolete and probably abandoned technology and promises and commitments given at the application stage quietly forgotten.

The Scheme, a Nationally Significant Infrastructure Project (NSIP), comprises ten separate solar photovoltaic (PV) panel Sites (designated 1 to 10) connected to each other and various sub-stations (400kV and 132KV) by electricity cabling running underground along Cable Route Corridors. Site 10, the focus of this report (containing extensive solar panels, a substation and a construction compound) lies at the far eastern extremity of the proposed Scheme, bordered by the small rural parishes of Hedenham, Seething and Woodton some 15 km distance from the proposed Grid connection point in Great Moulton.



Figure 1 - Elements of East Pye Solar Site 10

The proposed Site 10 (itself comprising sub-sites A, B, C, D & E) lies to the east of the busy Bungay to Norwich B1332 road and, with the exception of sub-site 10E, to the south of Harvey's Lane, a narrow rural lane which connects the B1332 to the equally narrow Seething Road which itself forms the eastern border of the Site. Transport access to sub-sites 10A, B, C & D would be via two principal access points off Harvey's Lane with transport access to sub-site 10E being along Harvey's Lane and then northwards up Seething Road.

In terms of the Scheme infrastructure, Site 10 would be connected by an extended 15 km Cable Route Corridor comprising of CRC8 and CRC9 leading to sub-sites 10A, B, C & D with an additional dedicated CRC14 leading onwards to sub-site 10E (refer Figure 2 below).

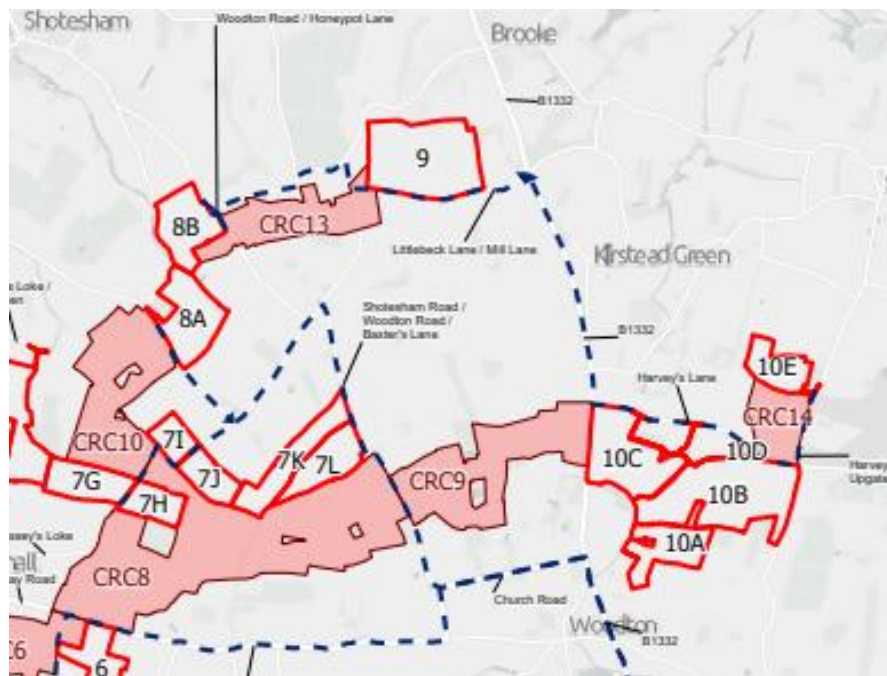


Figure 2 - Site 10 at the far east of the Scheme at the end of a long cable corridor

On the whole, Site 10 appears somewhat incongruous stuck out on the eastern most edge of the Scheme and as such a significant distance from the proposed Grid connection. It is hard not to conclude that Site 10 was included within the Scheme simply to make up the numbers as from an engineering or cost perspective it makes limited sense whilst significantly adding to the sprawl, and construction damage, of the Scheme across a swath of South Norfolk countryside.

This document is focused on those issues that, in the context of the many and wide-ranging impacts of the Scheme, are considered to be of particular significance and perhaps uniqueness to Site 10. As such, this document forms an addendum to the principal objection document prepared by the Block East Pye Solar Group (BEPS) with whom we work closely. Their recent submissions have comprehensively covered the environmental, social, economic and heritage impacts of the Scheme as a whole. Most, though perhaps not all, of these wider Scheme issues will be relevant to Site 10 but since they are dealt with thoroughly within BEPS's principal objection document, the contents of which we wholly endorse, they do not need to be repeated here.

2. Site and Surroundings

Site 10 is an unassuming piece of gently rolling, peaceful, South Norfolk landscape triangulated by the medieval villages of Woodton, Seething and Hedenham. It is bounded on the west side by the B1332 road running north from Bungay to Norwich and on the east side by Seething Road, a narrow rural lane running north from Hedenham to Seething. Both Hedenham and Seething villages lie within Conservation Areas with strict rules governing how the visual landscape and local heritage should be protected.



Figure 3 - Area of land between the three villages where Site 10 is proposed

The Site is at the very eastern end of the proposed Scheme some 15km (by road) from the potential Grid connection point near Great Moulton.



Figure 4 - Site 10 to Grid connection

The area is agricultural, used to grow cereal crops, quiet and dark at night with no artificial light sources. Indeed, there is an astronomical observatory within 500m that relies on night-time darkness, the reason that it was relocated to its current location 30 years ago. There are existing ancient woodlands within and surrounding Site 10 with a plethora of English rural wildlife.

There are no residential homes within the Site itself, but there are various homes less than 500m from the Site boundary, some within 200m including Grade 2 listed heritage homes.

A number of businesses are sited within 500 metres of the Site 10 boundary that will be negatively affected in various ways, particularly those businesses that rely on visitors and customers who have come to enjoy the local countryside that has remained largely unchanged for centuries and the peace and quiet of a currently unindustrialised region of the UK.

Well frequented public footpaths and byways including Pound Lane, Wash Lane and Hobb's Lane cross the site. The area is also regularly used by local games shoots.

There is an ex- WW2 USAF 8th Airforce airfield situated across the eastern end of Site 10, that is actively used by a flying club as well as housing a popular museum and memorial reminding visitors of the airfield's important WW2 heritage. The existence of the active airfield raises issues unique to Site 10, notably important safety issues, that will be hard to mitigate should Site 10 be developed as currently proposed. (Please see Postscript in Section 10)



Figure 5 – Looking south from Wash Lane into sub-site 10A



Figure 6 – Looking North from Hedenham along the Seething Road towards Seething

Site 10 is more than 140 hectares in area. The proposed areas designated to accommodate the Solar Panels (shown in blue in the diagram below) are significant and concentrated. They will be visible from various local roads. It will be impossible for them not to have a significant impact on the rural nature of the locality.

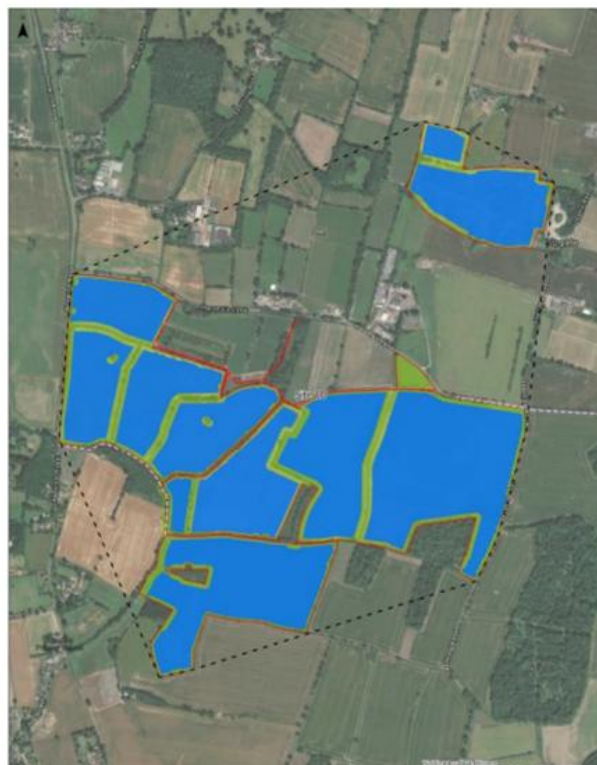


Figure 7 – Proposed location of Solar PV Panels within Site 10

It is inevitable that, despite assurances to the contrary, the concentration of thousands of four plus metre high solar panels within the site, surrounded by security fencing and automatic movement detection lighting, will have significant detrimental impacts for local residents and wildlife alike. Not only will local residents who currently enjoy the rural lanes, footpaths and byways crossing the Site on foot, bicycle and horseback face access restrictions and the loss of rural vistas but also for example, along with other wildlife, a herd of red deer which currently roams the land to be covered by Site 10 will face the loss of much of their territory.

It is clear from solar farms already constructed in the UK, that such developments create a harsh and unforgiving industrialised environment that is unlikely, despite promises, ever to be returned to its original rural condition. In saying this, we are aware that the East Pye mega solar farm would be an order of magnitude larger than all solar farms currently operating in the UK with the exception of Cleve Hill solar farm in Kent. Cleve Hill which has been operational since mid-2025 and is currently the largest operating solar farm in the UK covers less than half the land mass of East Pye. It is already evidencing negative impacts to the local community despite assertions to the contrary. With the development of these mega solar farms stretching across the countryside and surrounding residential areas we are entering a new world of which the UK has currently minimal if any experience.

In terms of the East Pye development, the stated lifetime of the solar farm of up to 60 years, will mean that rural aspects of the local countryside will be lost forever, at least for the next two generations. We can assume that the consequent industrialisation of the land will make it much more unlikely that Site 10, along with all other Sites within the Scheme, will ever be returned to its current condition leaving the land open to extensive housing and/or industrial development, with the permanent loss of a very significant proportion of the South Norfolk rural environment.

3. Ecology and Biodiversity

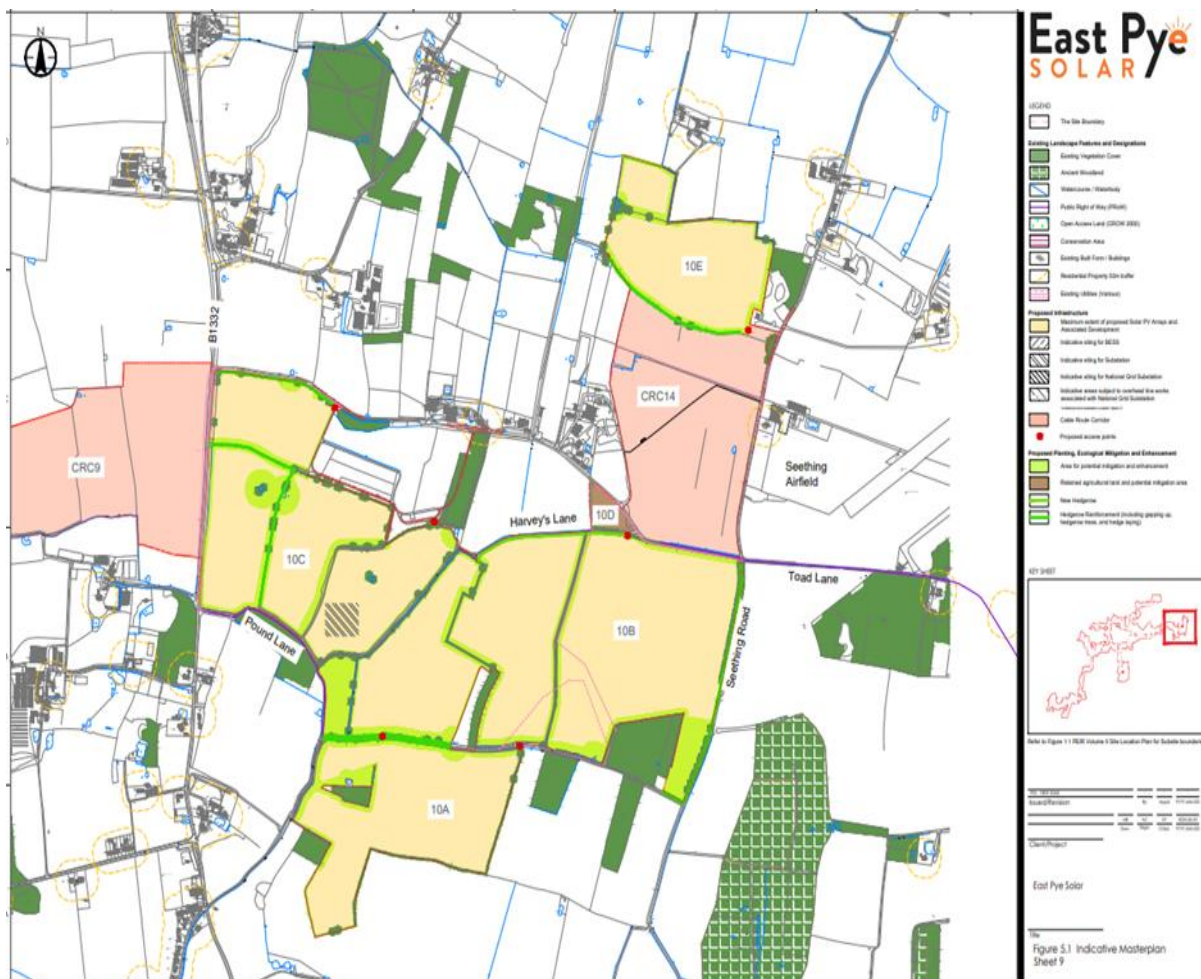


Figure 8 – Site 10 and surrounding woodlands

Side note: It should be noted that there are the following inconsistencies in the East Pye map included above:

- Harvey's Lane is not in the location shown
- New hedging on the north side of sub-site 10E is not consistently portrayed between different EPS maps.
- Sub-site 10D is marked as "retained agricultural land and potential mitigation area" but it is a non-farmed triangle of wet scrub of limited value for agriculture or mitigation.

3.1 Woodland and Countryside stewardship

Site 10 is included within the Woodland Priority Habitat Network and notably is a priority area for Countryside Stewardship targeting in respect of Lapwing. It also borders woodland covered under the Woodland improvement scheme and immediately borders a site of special scientific interest - namely Hedenham Wood. The diverse ground flora at Hedenham Wood includes several rare species.

In addition, the Site immediately borders areas of land prioritised within the Priority Habitat Inventory, a spatial dataset that maps priority habitats identified in the UK Biodiversity Action Plan and listed as being of principal importance for the purpose of conserving or enhancing biodiversity, under Section 41 of the Natural Environment and Rural Communities Act (2006).

The Site also falls under the Farm Wildlife Package which aims to encourage and support farmers to proactively manage food sources for birds listed under the red list and develop and enhance habitats for various wildlife species.

3.2 Barbastelle Bats

A recent survey conducted by BEPS in 2025 has shown that Maternity Colonies of highly protected Barbastelle bats are present in this part of South Norfolk. They are established in the ancient woods that are found across the region.

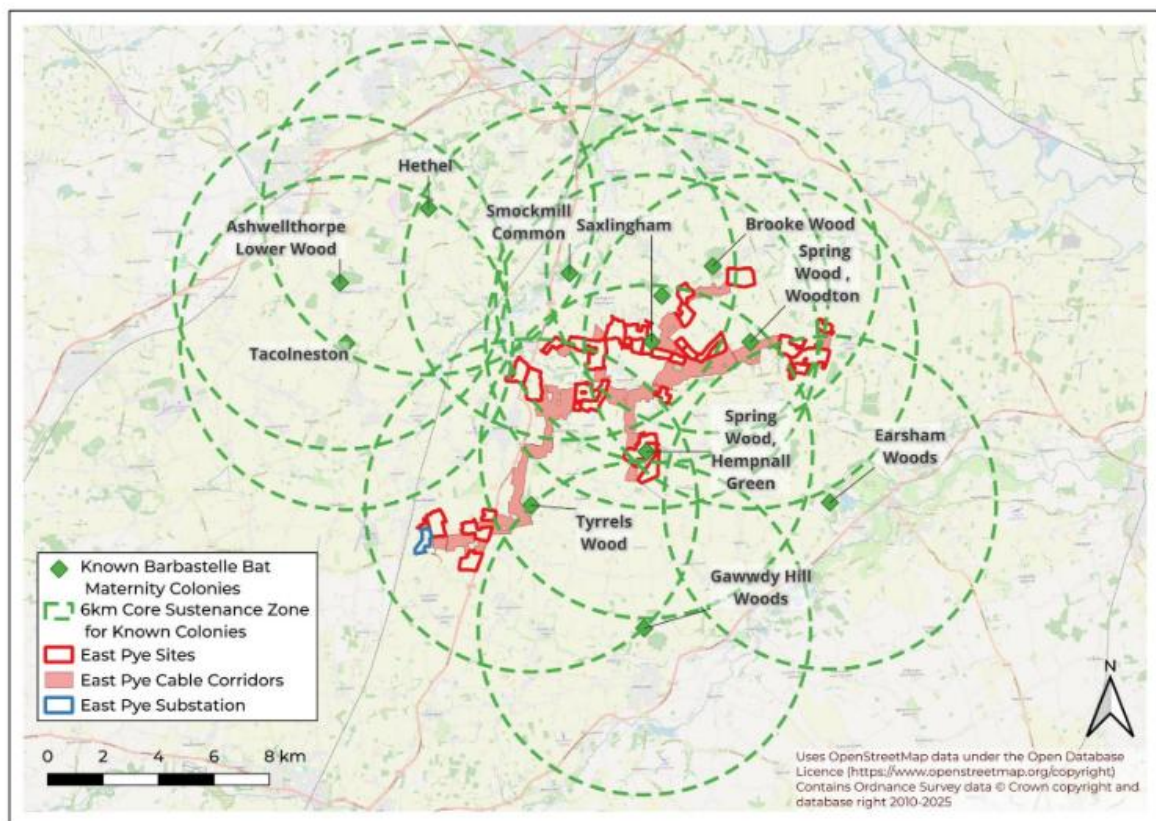


Figure 9 – Maternal Barbastelle bat Colonies covering Site 10

As illustrated above, Site 10 falls within the areas where maternity colonies of Barbastelle bats have been identified in Brooke Wood and Spring Wood, Woodton. These bats are protected in the UK under the Wildlife and Countryside Act 1981 and are on a global red list of threatened species.

Where a proposed Nationally Significant Infrastructure Project (NSIP) is located within overlapping Core Sustainance Zones for Barbastelle bats and directly adjacent to multiple ancient woodlands supporting maternity colonies, the impacts of construction disturbance, habitat fragmentation, lighting, noise and long-term landscape disruption are intrinsic to the scheme and cannot be reduced to a level that avoids adverse effects on the local Barbastelle population's favourable conservation status.

As such, the effects are not capable of mitigation, and the scheme is fundamentally incompatible with the current Habitat Regulations.

4. Hydrology

4.1 Run-off water management

Site 10 does not have any major waterways, but there is an existing important field drainage system that runs as a strong seasonal (winter) brook down the side of Wash Lane towards Woodton. Here it crosses under the B1332 and flows along a hard culvert along the east side of The Street, Woodton, eventually joining Broom Beck that flows back to Hedenham and onward down the valley to join the Waveney River.

This drainage system will have to take all the runoff from Site 10. Since the soil is predominantly clay, the runoff is significant.

The construction and operational phases of the East Pye Solar Farm will increase water runoff down this water course due to construction activity, soil compaction and the runoff from the panels themselves created by concentrated drip lines.

Site preparation, such as compaction of soil and vegetation removal, reduces the ground's capacity to absorb water (Reduced Infiltration).

This hydrology system has a bottle neck in Woodton where The Street has a history of flooding, with the last serious event in 2020. This situation has subsequently been compounded by road run off from the new Nursery housing development directly into The Street.

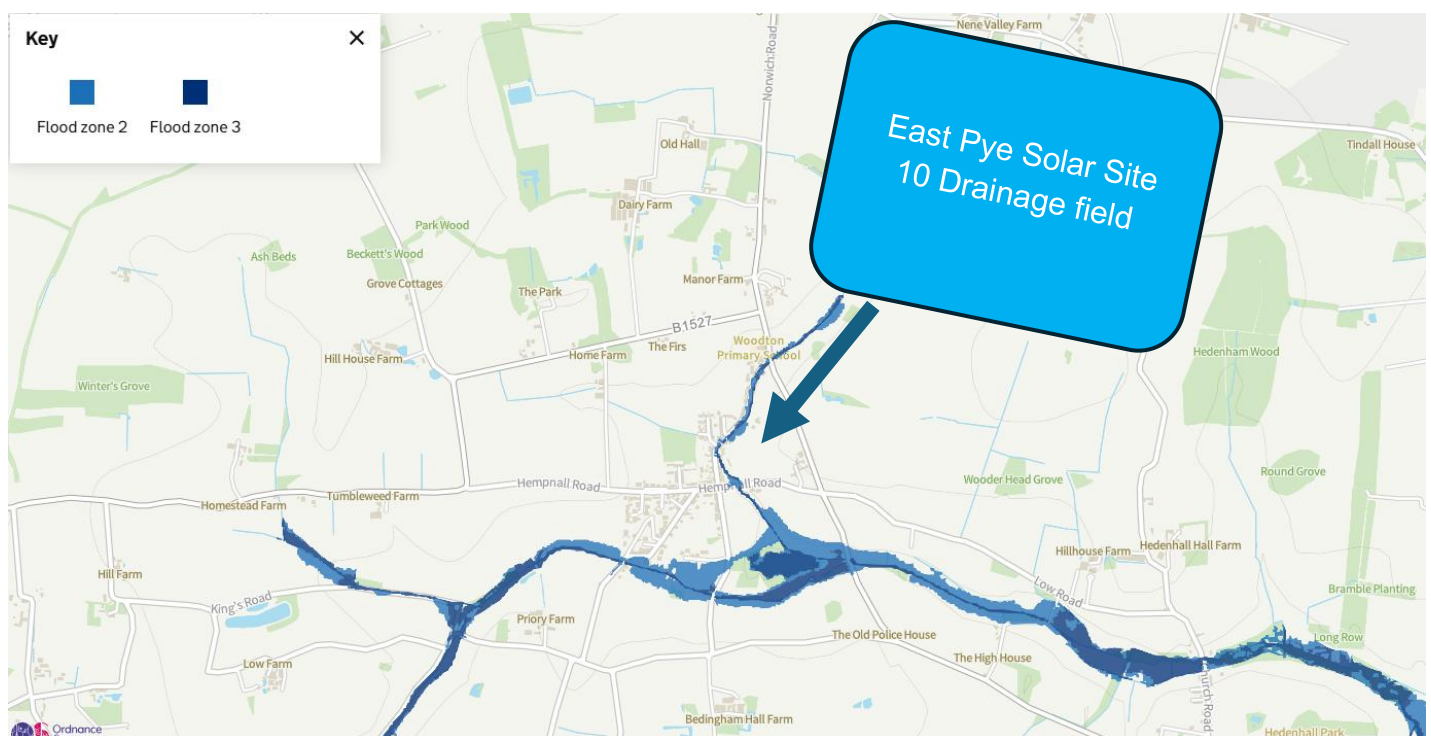


Figure 10 – Flood Risk map for run off system from Site 10. Water flows from top right to middle



Figure 11 - The Street, Woodton showing run off culvert (left) and looking towards historical flooding zone

Woodton is already included in the flood defence Reclaim the Rain Scheme run by Norfolk and Suffolk CC () and has been awarded funds to address the existing problems even before additional East Pye water run off arrives in the village.

“In the past Woodton has suffered from surface water flooding. There was a major flood event in December 2020, where a number of properties were internally flooded. Creative solutions will be needed to address the local flood risk.”

“Recent flood reports involving Woodton show that there is a risk to residential dwellings from surface water. This means that planning ahead to increase resilience in the village is very important”

If there is any possibility of additional run off coming down this natural water system from Site 10, mitigation measures must be taken to hold water back to prevent renewed flooding in The Street, Woodton.

Possible mitigation measures could include:

- *Vegetation Maintenance:* Maintaining healthy, deep-rooted vegetation under and between panels is one of the most effective ways to slow water and encourage infiltration.
- *Structural Solutions:* Using infiltration basins, lagoons, swales, berms, and vegetated filter strips to help manage concentrated runoff.
- *Design Considerations:* Avoiding excessive compaction during construction, keeping rows spaced for infiltration, and ensuring proper site grading are essential for long-term management.
- *Panel Setup:* Elevating panels off the ground can reduce, though not eliminate, the impact of rain hitting the panels directly.
- *Perimeter Drainage:* Formalised perimeter drainage scheme.
- *Rerouting:* Redirect the water flow away from the bottle neck in Woodton high street.

5. Cultural Heritage

Within Site 10 the impacts on cultural heritage primarily fall into three principal issues of concern:

- Conservation Areas status
- USAF 8th Airforce legacy and Memorial
- Listed Building impact

5.1 Conservation Areas General

Seething and Hedenham Villages each lie within existing South Norfolk District Council Conservation Areas.

Under the terms of the Planning (Listed Buildings and Conservation Areas) Act 1990, the Local Planning Authority is required to identify areas of special architectural or historic interest whose character or appearance it is desirable to preserve or enhance, and to designate them as a Conservation Area. The 1990 Act also requires local authorities to prepare management guidance and proposals for Conservation Areas.

It should be noted that the Conservation Areas are not focused on Flora and Fauna but on the landscape (urban and rural), living and visual environment. Within the Conservation Areas strenuous efforts are made at planning level to ensure the existing character of the area is retained.

The construction of a nearby mega solar farm, particularly one lying midway between two village Conservation Areas and with solar fields containing thousands of limited life (but currently unrecyclable) ground mounted solar photovoltaic (PV) panels would appear to be wholly at odds with the Conservation Area designation of the two adjacent medieval villages.

5.2 Seething Conservation Area

The small rural village of Seething lies less than one mile north of the proposed Site 10. The Seething Conservation Area was originally designated on 12 October 1994, and the most recent character appraisal of this Area was undertaken by South Norfolk Council in December 2019.

Seething is surrounded by relatively flat agricultural land and consequently some village buildings, most notably the church, can be viewed from some distance away. Within the village along the main street landscape in the form of trees and hedgerows also dominate views creating a very spacious and rural feel to the village. The village has not been extended with any large scale suburban or estate like development, and therefore its linear characteristics are well preserved with the conservation area including most of the settlement.

Pertinent extracts from the 2019 Character Appraisal are shown below.

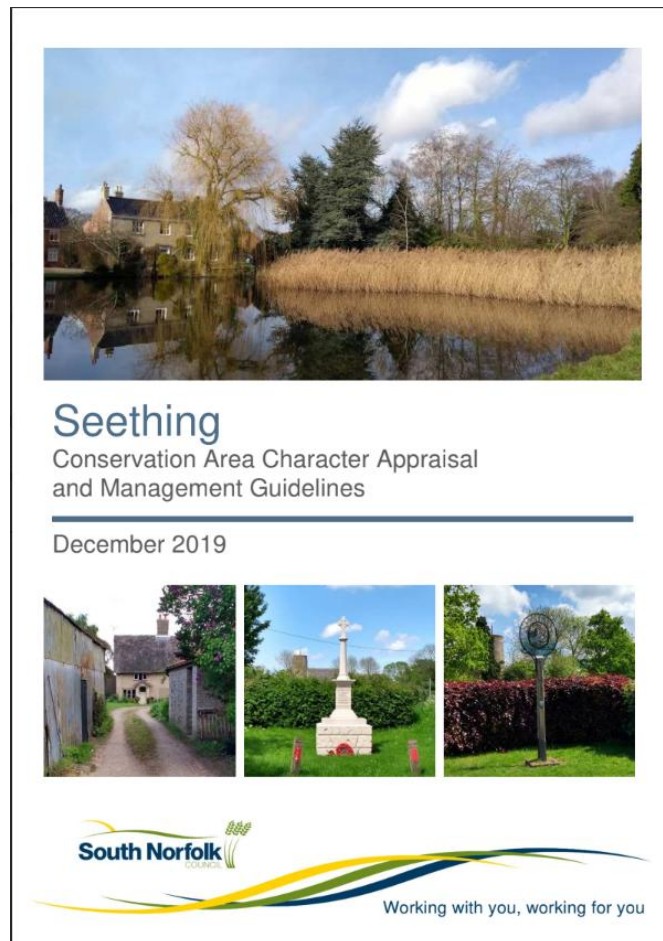


Figure 122 - Seething Conservation Area Appraisal 2019

Natural Character



Along The Street hedgerows and trees are important



The picturesque Mere and reed bed

The roads within the village are well landscaped with plenty of mature trees along the village streets and properties generally slightly set back behind hedgerows. This lends the village a more rural village character.

The open space to the south of the church and the immediate area to the north east and north west around it (partly cultivated for allotments) assists in defining the moated area and is very important to the setting of the church.

The area around the mere provides a very picturesque landscape and a tranquil setting with only Mere House and Ponds Farmhouse, both historic properties, visible in views to the east and west of it.

Specific examples of Conservation Management Guidelines relevant to Seething are provided below. Similar guidelines are in place for Hedenham.

Conservation Management Guidelines

Highways



Rural character of streets

Seething has a very informal character with no footpath or kerbs. The road is very lightly trafficked. Brooke Road is busier and has a pavement.

Urbanising of the rural character with urban road features should be avoided where possible, although it recognised these can provide safety.

12 Seething Conservation Area Character Appraisal

Upgrading windows and doors/solar panels



Replacement windows

In some cases windows and doors have been replaced with different materials and/or different styles.

If door or window frames need to be replaced they should ideally be replaced with the original materials. However, if different materials are chosen then the window style should still remain the same (if original). The opportunity should be taken to reinstate traditional style windows where they have been unsympathetically replaced in the past. Solar panels should be avoided on front elevations.

Painting/colour washing buildings



Rendered cottages

There are a number of painted properties in the village. Presently the colours work well together to give a sense of visual harmony in the village.

Careful consideration needs to be given to painting buildings to ensure the visual harmony of rendered cottages in the village is retained.

Figure 13 – Specific requirements within the two Conservation Areas

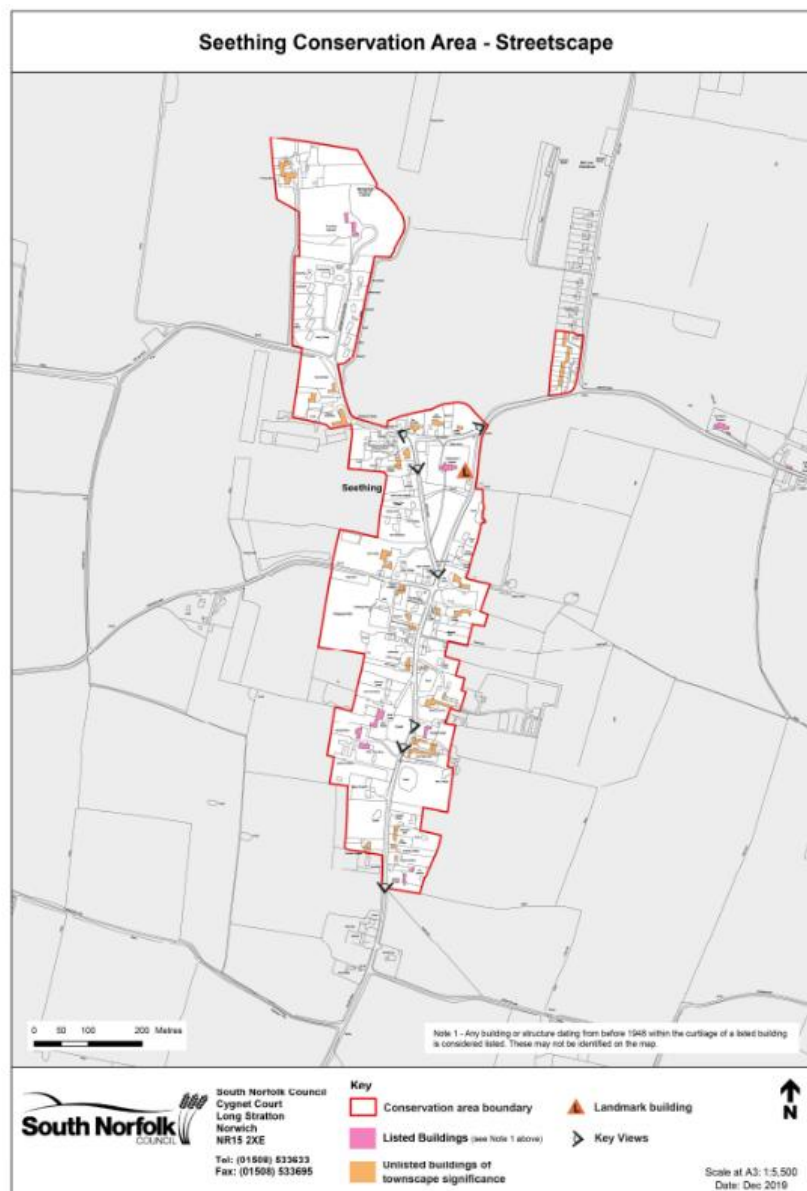


Figure 14 – Seething Conservation Area covering the whole village

5.3 Hedenham Conservation Area

The most northerly part of the village of Hedenham lies less than one mile south of the proposed Site 10. The village itself is divided into two parts by the B1332 Norwich Road.

The village is set within a relatively flat plateau which at the north end drops down to a small stream, Broome Beck, which flows eastwards. Saint Peter's church is situated on the other side of the stream at the north end of the village, with the road passing through quite a deep cutting to its west side. To the south-east is the extensive wooded parkland of Hedenham Hall and Ditchingham Hall, with a significant serpentine lake to the east of Ditchingham Hall created from the damming of the stream. To the south the land is relatively flat clay land with ponds, drainage ditches and wooded areas. There is a strong sense of enclosure within the settlement with high hedgerows and trees bordering small paddocks and meadows, whereas to the southern edge there are expansive views over large agricultural fields.

The country houses of Hedenham Hall and Ditchingham Hall and their respective parkland dominate the area. The settlement has a strong rural character relatively unaffected by more recent development, with the areas either side of B1332 Norwich Road having a different settlement character. When first designated in 1994 the Hedenham conservation area did not include within its boundary the area to the south known as Hedenham Green. This area contains several historic properties and a landscape rural settlement pattern resulting from the enclosure of common land in the 19th century. Following the recent 2024 appraisal and public consultation Hedenham Green is now included within the Hedenham conservation area.



Figure 15 – Hedenham Village Conservation Area Appraisal, May 2024

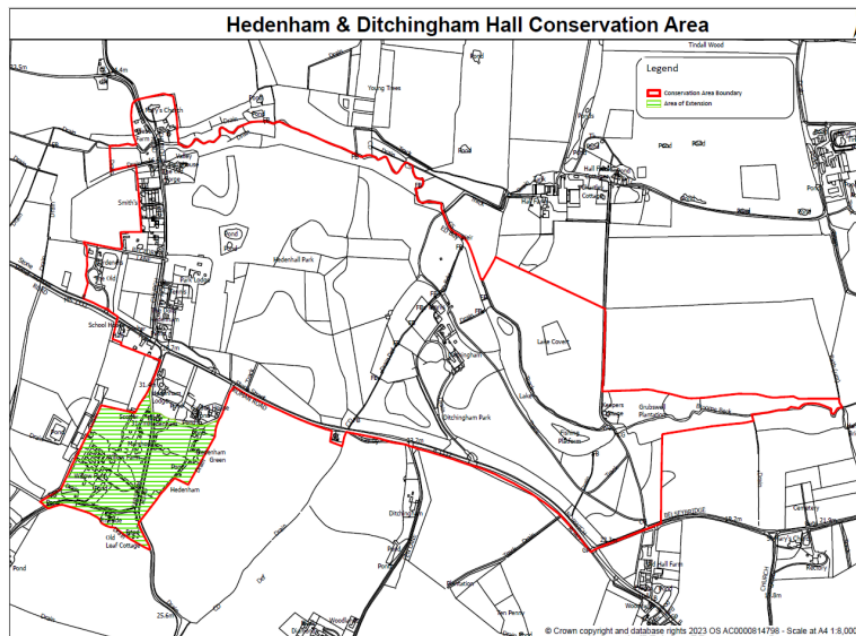


Figure 16 – Hedenham Village Conservation Area map

In relation to the proposed solar farm, a principal point of contention is that Seething and Hedenham villages are covered by strict conservation measures applying under the terms of the Planning (Listed Buildings and Conservation Areas) Act 1990, to ensure the local environment is retained to preserve its character and heritage. Furthermore, the villages of Hedenham and Seething are connected directly by Seething Road running north - south along the east side of Site 10. From the southern end of Seething to the northern edge of Hedenham is only 1.6 miles as shown below:

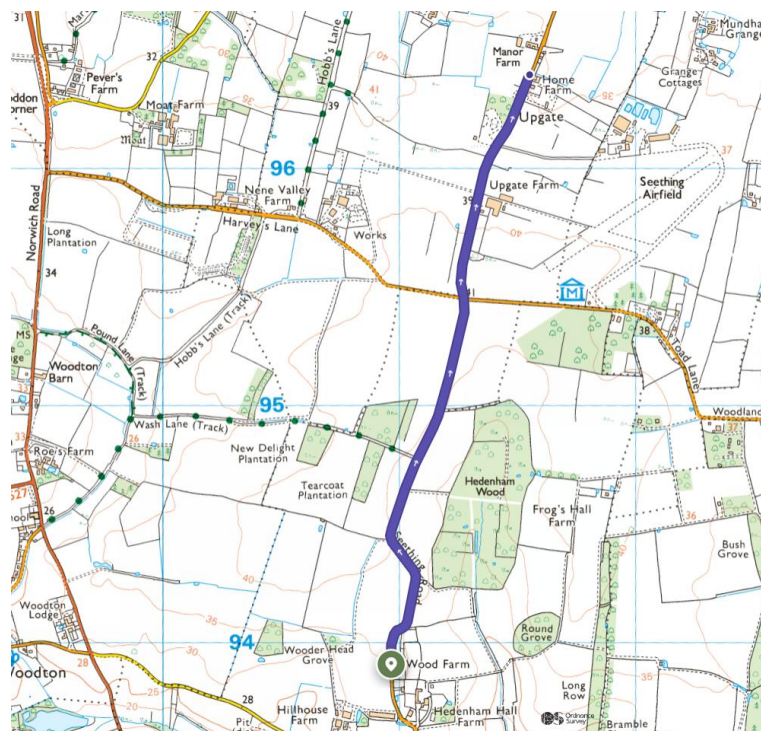


Figure 17 – Direct route between Hedenham and Seething past Site 10 solar fields



Figure 18 – Seething Road looking north. Sub-site 10B would lie in the field to the left

Consequently, at each end of the 1.6 mile road there are strict measures to control the visual environment but in the middle section to the western side of the Seething Road will be fields covered with thousands of four metre high solar PV panels surrounded by security fencing similar to that shown in the image below.



Figure 19 – Typical Solar Farm security fencing

This seems wrong from every aspect and totally in conflict with the efforts to preserve the historic character and heritage of the villages of Seething and Hedenham through the Conservation Area scheme.

5.4 USAF 8th Airforce Legacy

During the Second World War an American bomber base was built to the southeast of Seething village. The base was home to the 448th Bomb Group of the 2nd Air Division of the 8th American Air Force from 1943 to 1945. The base was constructed for four squadrons of Liberator bombers. Part of the airfield and various outbuildings still exist around the area, and the control tower has been converted into a museum. It is estimated that as many as six thousand American airmen came to Seething during the war. It was the home for the airmen and women who flew from the airfield and sadly on frequent occasions failed to return.



Figure 20 – 448th Bomb Group of the 8th American Airforce at Seething 1945



Figure 21 – 8th Airforce Crew at Seething 1945



Figure 22 – Seething Control Tower and Memorial Garden

The Seething Control Tower Museum Association is managed by unpaid volunteers who administer and make the building, contents and archives available to residents, researchers, tourists and veterans and their families.

“We exist to preserve and maintain the fabric of the Seething Airfield Control Tower, the surrounding grounds and any associated artefacts, documents or equipment connected to the use of the airfield in the Second World War.

We provide a permanent memorial honouring American service personnel who served in 448th Bomb Group and connected squadrons at Seething in WW2 and work to inform and educate interested persons to ensure their service and sacrifice is not forgotten.”

The proposed Site 10 will cover over a section of the original airfield and buildings so archeologically it will be lost. As importantly, the proximity of the solar farm and its security fencing will irrevocably alter the historic setting of the airfield, museum, and memorial which currently retain the rural ambiance of this important WW2 site.

If the East Pye Scheme is permitted to proceed, you will not be able to approach the museum and memorial from the west without driving alongside fields covered with solar panels and flanked by security fences.

Due to the historic and nostalgic importance arising from its important role in WW2, Seething Airfield should be respected and preserved and not be permitted to partially disappear under sub-site 10B of the proposed solar farm. Were this to be permitted, this would feel highly disrespectful to the sacrifices of those men and women of the 8th American Airforce who fought and died from this Airfield during WW2.



Figure 23 – Extent of USAF Seething seen below current crops

Side Note: There currently is a restoration/conversion being conducted of a brick barrack block on the old Hardwick ex-USAF WW2 Airfield site near EPS Land site 3A (SNDC planning reference 2022/1960) where very strict planning constraints have been imposed to preserve the WW2 heritage and historic character of the previously dilapidated buildings. The same approach should be taken for Seething ex-USAF airfield.

5.5 Impacts on Grade II Listed Properties

There are six Grade II listed properties along the Woodton edge of Site 10, all situated on the B1332.

- Beulah Barn
- Beulah House
- Manor Farmhouse
- Old Rectory
- The Tumbledown Dick
- Woodton Lodge

These heritage assets take much of their value not only from their architectural features, but from their rural context and historic setting. Noise, visual intrusion and landscape alteration would completely change the historic character and sense of place that contribute to their historic value, and therefore their listing significance.

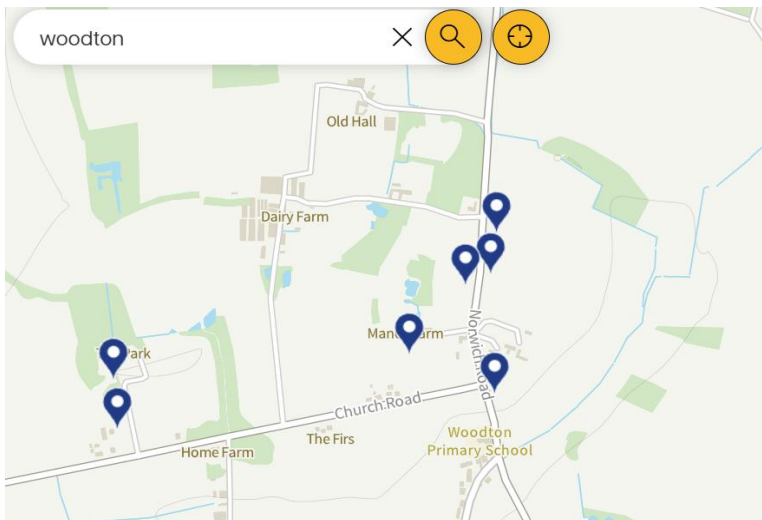


Figure 24 – Listed buildings adjacent to Site 10

Adverse changes to their immediate backdrop, from the presence of a large solar farm, would alter the authenticity and integrity of these listed buildings beyond repair, diminishing both their heritage value and their contribution to the wider character of the area.

The irony of these listed properties not being allowed to have solar panels installed themselves, but potentially gaining far reaching views of rural fields covered by solar panels are not lost on their occupants.

Seething and Hedenham each have Grade I and II listed properties that will be detrimentally impacted by the scheme especially during the construction phase.

6. Transport and Access

6.1 Impacts on the Local Road Network

There are considerable concerns in the local community about the proposed access road network required during the construction phase. The B1332 is proposed as the principal route to the Site leading on to Harvey's Lane and the two principal access points into sub-site 10C and onward into sub-sites A and B. Access to sub-site 10E is more problematic as it requires transit eastwards down the full length of Harvey's Lane and a turn left (north) onto Seething Road/Upgate Road towards Seething.

Both Harvey's Lane and Seething Road/Upgate Road are identified as HGV and Abnormal Indivisible Loads (AIL) routes during the proposed construction phase of the East Pye proposal. Both routes are narrow rural lanes which are already regularly used by increasingly large farm vehicles and by tankers transiting to and from the organic waste lagoons managed by Whites Recycling which are adjacent to Seething Airfield. These existing large vehicles already require oncoming traffic to come to a halt and in some cases seek refuge to allow them to pass safely. The additional oversize vehicle traffic associated with the East Pye construction phase is a recipe for an extended period of chaos with its major impact on the ease of passage and safety of other road users, cars, commercial vehicles, cyclists, horse riders and pedestrians alike.

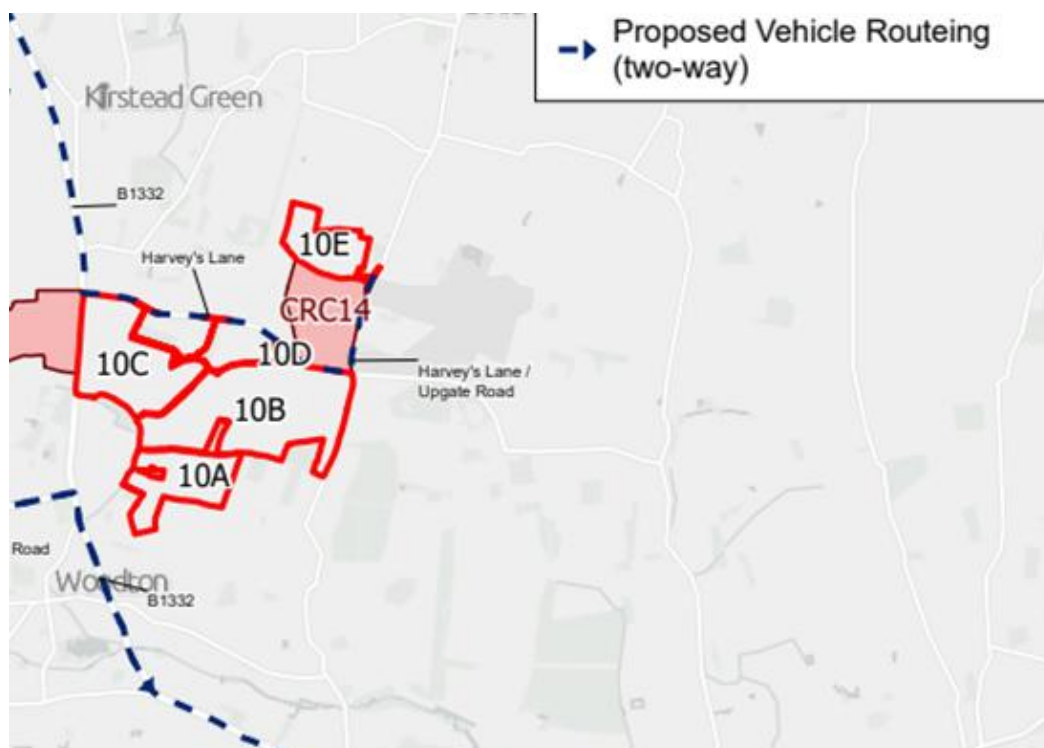


Figure 25 – Proposed construction traffic routing into Site 10

The B1332, an already congested thoroughfare from Bungay and surrounding villages to Norwich, will bear the brunt of the additional construction traffic. Furthermore, as the cable corridor from subsite 10C will need to cross under the B1332, the associated construction work will cause major disruption to traffic flows on this busy road when it is undertaken.

6.2 Proposed Road Widening

Seething Parish Council have already raised their concerns with regard to the unsuitability of the local road network in their response to the Phase 2 consultation dated August 2025 and reiterated these concerns in their response to the Targeted Consultation dated November 2025:

Of specific relevance to the Targeted Consultation are their response points referencing the unsuitability of Harvey's Lane and Seething Road/Upgate Road for HGV traffic, relating to carriageway width, soft verges and poor visibility.

Moreover, the Targeted Consultation Information Note (page 16) published by East Pye describes Changes and Updates in respect of Abnormal Indivisible Load (AIL) routes and General Construction Traffic Routes states: "...there may be the potential requirement for widening of the highway, [and] vegetation removal".

In the opinion of Seething Parish Council, any such widening and vegetation removal would have considerable adverse ecological impacts. They also highlight that the highway verges that bound the route (extending from the Seething/Kirstead parish boundary, eastward along Harvey Lane and then north along Seething Road and Upgate Road to the northern boundary of CRC 14) are populated by a large number of important native trees that must be protected from potential AIL or HGV damage. These trees comprise both mature (and very mature) trees alongside younger trees that are of equal importance, as such specimens provide our future mature tree populations.

6.3 Site Access Points

There are two proposed principal Access Points to the Site 10 off Harvey's Lane leading into sub-sites 10B and 10C. Notwithstanding issues relating to the unsuitability of Harvey's Lane for construction traffic, these Access Points onto the Site itself, which are shown below, could with significant upgrading to accommodate



Figure 27 – Access from Harvey's Lane into sub-site 10B



Figure 26 - Access point from Harvey's Lane into sub-site 10C

the size and scale of the construction traffic be workable.

However, there are two proposed inter site access points between sub-sites 10A and 10B that are unsuitable for heavy or frequent traffic as they cross over an ancient byway (Wash Lane).



Figure 28 – Detail of Access Points into sub-site 10A

Wash Lane is an unrestricted byway (technically a “Council Maintained Unsurfaced Road”) that is generally impassable to motorised traffic (except small tractors and off-road motorcycles) due to its routing, narrow width between mature hedges, and proximity to a seasonal drainage brook along one side, hence its name. However, since Wash Lane is a legal Highway all aspects of the Highways Act must apply to traffic on it or traversing across it.



Figure 29 – Proposed **Heavy Goods Vehicle** #1 Access Route (right to left) across Wash Lane into sub-site 10A



Figure 30 - Proposed **Heavy Goods Vehicle #2** Access Route (right to left) across Wash Lane into sub-site 10A

The proposed solution for access into Sub-site 10A is therefore wholly impractical and would result in the ruination of this peaceful rural byway used by many walkers, runners and other leisure users. There is no mitigation proposed.

Since Sub-site 10A is land locked there are no alternative entry routes for construction traffic without crossing Wash Lane, which should not be permitted due to the damage that this would cause to this ancient byway during construction and future operational access.

(Please see Postscript in Section 10)

6.4 Impacts on Public Rights of Way

There are strong local concerns that the existing rights of ways may not be maintained should the Scheme proceed particularly along Hobbs Lane.

In addition, there are significant concerns about the new screening and security fencing proposed throughout the Scheme changing the nature of these ancient routes. Hobbs Lane and Wash Lane which will be bordered on both sides by fields covered in solar PV panels whilst Pound Lane will have fields of solar PV panels and associated security fencing along its northern edge.

It is inevitable that, despite assurances to the contrary, the concentration of thousands of four plus metre high solar panels within site 10, surrounded by security fencing and automatic movement detection lighting, will have significant detrimental impacts for local walkers, cyclists and horse riders.

Residents who currently enjoy the rural lanes, footpaths and byways crossing the Site will face access restrictions, construction chaos and the loss of rural vistas.

6.5 Impacts on Pedestrians and Children

Since the B1332 runs alongside the Woodton village primary school any increase in traffic and particularly HGV traffic needs to be carefully managed to avoid increasing the risk of accidents along this part of the road. This risk is at its highest when children are being dropped off and collected from school. Being a rural school with a large catchment area many children are driven to school each day.

A crash map of incidents occurring on the B1332 running through Woodton is shown below. It illustrates that unfortunately accidents along this section of the road running past the primary school are not uncommon despite additional speed restrictions and warning lights operating during school drop off and pick up times. Any significant additional HGV traffic volumes due to East Pye construction traffic would consequently be unwelcome and would inevitably increase the accident risk unless strong additional traffic management measures were implemented.

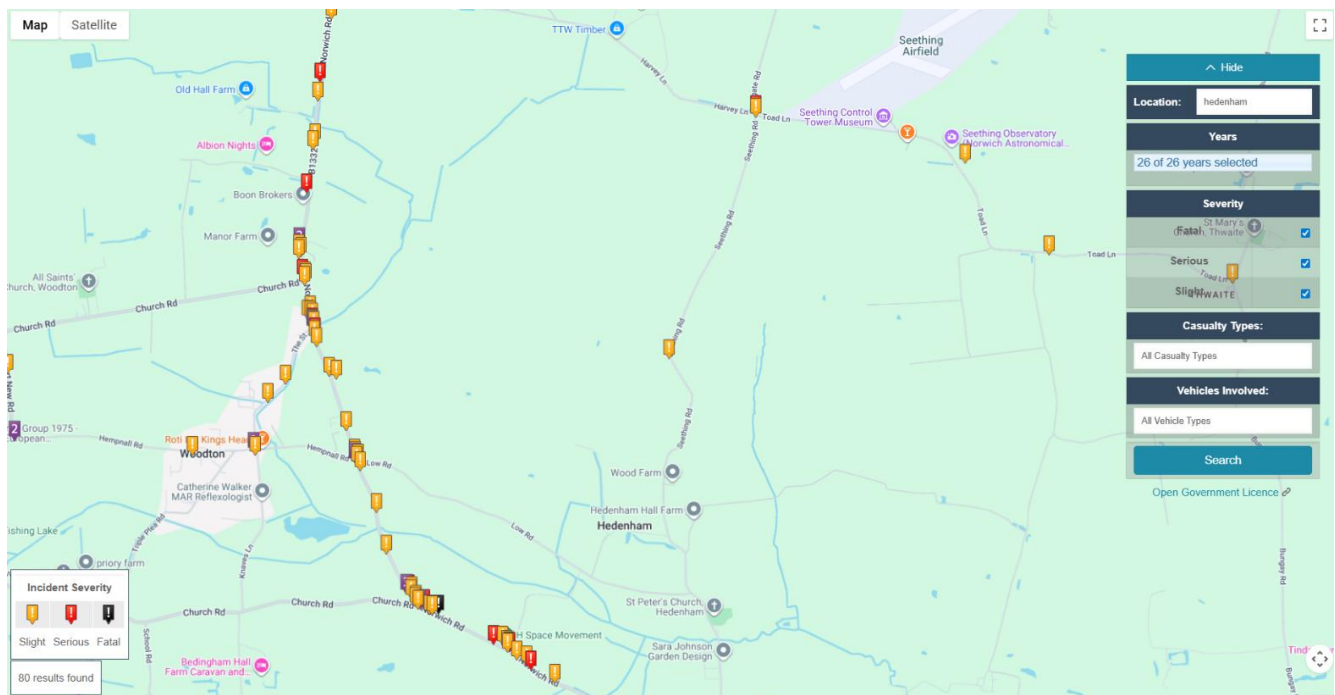


Figure 31 – Current crash map for the relevant section of the B1332

There are also concerns about the additional build-up of damaging particulates, notably emitted by diesel powered vehicles, near the Woodton Primary school exacerbated by the school being in a natural dip in the landscape.

6.6 Impacts on Cyclists

The B1332 is generally too busy for cycling, however the side roads and lanes around Site 10 (and indeed throughout the Scheme as a whole) are very popular with cyclists. The construction phase will introduce many additional hazards – extra HGV vehicle movements, mud, road closures etc. that will increase the risk to cyclists and reduce the enjoyment of the significant number of people who take part in this popular pastime here in South Norfolk. Once the Scheme has been constructed, cycling past fields of solar panels enclosed by high boundary fences will be far less enjoyable and therapeutic than cycling past open agricultural fields with unspoilt views.

6.7 Parking for East Pye Solar Workers

It is currently unclear where all the construction workers required to build the site will park. There is construction compound proposed off Harvey's Lane, but it is not currently designated as a parking lot. Suitably sited and managed parking sites should be clearly designated in the application documentation submitted by East Pye and their use mandated.

6.8 Local Bus Transport

It is essential to local bus transport that the B1332 is always kept open since this bus route serves all the local villages providing convenient and cost effective transport into Norwich both for work and many other reasons.

7. Socio-Economics

7.1 Impact to Local Businesses and Tourism

The proposed scheme raises significant concerns for the local tourism economy. One business in particular which will be negatively impacted upon is award-winning Albion Nights. Albion Nights operates within a rural setting where tranquillity, dark skies and uninterrupted access to the countryside are central to the guest experience. Guests stay here to enjoy peaceful, off-grid stays, to escape the noise and hub-bub of city life, and to experience unplugged time, without Wi-Fi and screens.

Albion Nights has been cited in academic research papers and formed part of an academic presentation by Dr. Wenji Cai, Associate Professor in Tourism University of Greenwich and Dr. Brad McKenna, Associate Professor in Information Studies University of East Anglia. This was aimed at the tourism industry - Implementing Digital-Free Tourism in Your Organisation, with Albion Nights being cited as a leader in good practice.

Albion Nights has been featured on BBC 1, Channel 4's George Clarke's Amazing Spaces and in The Guardian (**10 of the Best Cosy Cabin Holidays in the UK**), The Times (**24 of the UK's Most Magical Cabin Stays**), plus Simple Things, Elle and Grazia have all run features.

The construction phase of the proposed scheme by EPS is highly likely to bring sustained noise from heavy machinery, large vehicles, piling and groundworks. This actively and fundamentally undermines everything offered to guests at Albion Nights. Even temporary works have the potential to cause booking cancellations, poor reviews and to create long-term reputational damage, in an industry where customer perception is critical.

Repeat bookings and word-of-mouth recommendations are both vital for small tourism businesses.

In addition to noise impacts, the proximity to an established walking route around Site 10, threatens to disrupt an added draw for visitors choosing Albion Nights. Many guests stay at Albion Nights specifically for access to countryside walks. Construction traffic, temporary road restrictions and visual intrusions from works compounds, etc will highly diminish the value of these routes.

The wider implication is the economic impact, with reduced occupancy rates, loss of income and weakened confidence in the area as a tourism destination. This gives rise to the issue of how, if at all, local businesses, notably those involved in tourism, will be compensated for loss of business and even potentially business closure due to the impacts of the construction phase of the Scheme and the long-term industrialisation of the landscape which will inevitably deter visitors and tourists from coming to this part of South Norfolk.

7.2 Waveney Arts and Crafts Centre

On Harvey Lane, on the Northern Boundary of site 10 C is the Waveney Arts and Crafts Centre in a rural setting encompassing a Deer Farm.

Waveney Arts and Crafts Centre is a functional arts centre with a specific remit to encourage arts practice and to provide facilities such workshop areas, educational facilities, technical equipment.

It is part funded by the European Agricultural Fund for Rural Development.

Its rural location is key to its uniqueness and will be fundamentally altered by being amid an industrial Solar Farm.

7.3 Waveney Valley Flying Club

Seething Airfield is a privately owned asphalt airfield in Norfolk. Situated close to the Norfolk and Suffolk border, a few miles from the coast, the airfield lies in uncongested airspace surrounded by picturesque countryside. It is the home to Waveney Flying Club which has operated at Seething since 1963. The club is run on a non-commercial basis by its members who benefit from low-cost flying and pilot training.

They welcome visiting aircraft, offer AVGAS 1 fuel, and all the facilities you would expect from a well-established flying club.

The proposed Site 10 location not only gives rise to serious safety concerns (covered in section 8) but, as it would sit at the end of the runway, the fields of solar PV panels and associated infrastructure will totally change the experience of flying from this long-established rural club.



Figure 32 – Waveney Flying Club operating from Seething Airfield

8. Other Matters

8.1 Glint and Glare

Whilst there is an airfield close to the boundary of Site 10, glint and glare from the solar PV panels needs to be considered in the viability of Site 10.

8.2 Light Pollution

In Seething, just behind the end of the airfield runway to the east, lies the Seething Observatory of the Norwich Astronomical Society (NAS).

The Norwich Astronomical Society was founded in 1945 by six men who met regularly to discuss their hobby and wanted to formalise their interest in astronomy. As the society developed it gained additional members leading to the construction of its own observatory first located on Daniels Road, Norwich. Over time, the increasing impact of light pollution led the society to relocate the observatory to Colney Lane, on the southern edge of the city. The society was situated there for over 20 years and continued to develop and enhance its astronomical observing facilities. When plans were drawn up showing that the new Norfolk & Norwich University Hospital was to be its next-door neighbour, NAS had to find a new location unaffected by the increasing light pollution. The Society found a new site at Seething in South Norfolk, and it has been based there since 1994. Currently this is a dark sky's location and on a good night you can see the arm of the Milky Way and many deep space objects.

NAS has a membership averaging 150 and meet regularly on Fridays for club night with members staying to the small hours of the morning.

If not sufficiently mitigated, light pollution from the East Pye development could again render the current observatory site not fit for purpose and force the NAS to find a fourth home in the space of 80 years.

8.3 Seething Airfield Crash Zone (Public Safety Zone)

Air strips and runways in the UK should have specific safety zones around them as follows:

Runway Safety Areas (RSAs) are critical zones surrounding runways designed to enhance safety by reducing the risk of damage to aircraft during runway excursions. They serve as a buffer zone around the runway to mitigate the consequences of aircraft excursions, which can occur when an aircraft veers off, overshoots, or undershoots the runway. These areas should be free of objects which would increase the risk of damage to aircraft and injury to occupants, a field full of 4+ metre high solar PV panels being a case in point.

RSAs are essential for ensuring the safety of both aircraft occupants and ground personnel by providing additional space for aircraft to come to a stop safely and facilitating emergency response operations. Seething Airfield has these zones within its perimeter already.

Public Safety Zones (PSZ) are designated areas of land at the ends of airport runways where development is heavily restricted, indeed actively discouraged, to minimize risks to people on the ground from aircraft accidents. Administered by the Civil Aviation Authority (CAA) in the UK, these zones aim to prevent an increase in the number of people living, working, or congregating near high-risk take-off and landing paths. PSZs are based on the risk to an individual from an aircraft accident during a year. They comprise an outer boundary which is the 1 in 100,000 risk contour (Controlled Zone) and an inner, high-risk zone (Restricted Zone), based on a 1 in 10,000 risk contour.

In accordance with policy guidelines, PZSs are based on the landing threshold for the runway concerned and taper away from the runway in an elongated isosceles triangle, as illustrated in the diagram below.

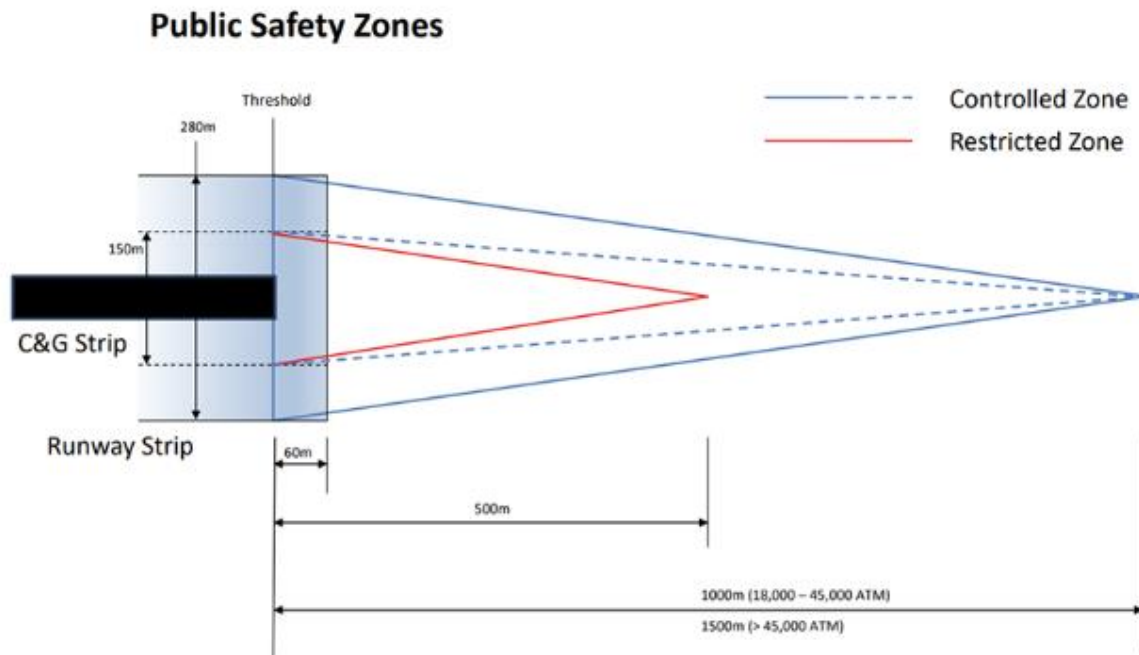


Figure 33 – Public Safety Zone guidelines

Under the policy guidelines illustrated in the diagram above, for an airfield such as Seething with less than 45,000 aircraft movements (ATM) per annum, the Restricted Zone should extend 500 metres from the runway threshold whilst the Controlled Zone should extend out to 1,000 metres from the runway threshold.

On this basis the PSZs intrude well into sub-site 10B to the southwest of Harvey's Lane.

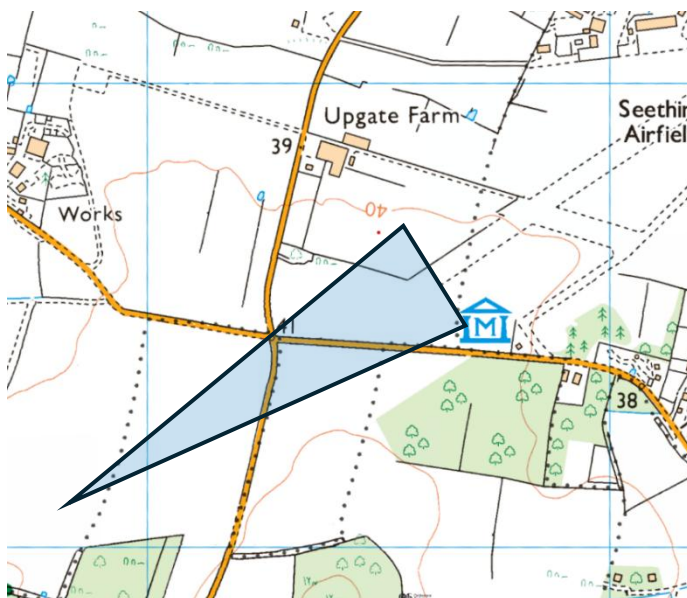


Figure 35 – OS Map with PSZ shown

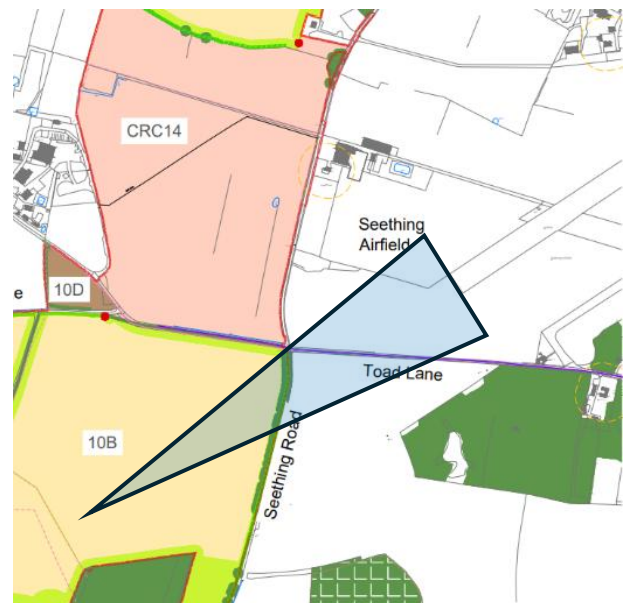


Figure 34 – EPS map with PSZ shown

Whilst some very limited development is permissible within a PSZ it needs to be remembered that the planes from Seething are light aircraft and impact with anything has a high probability of being catastrophic. (See *HMG Control of development in airport public safety zones. Updated 8 October 2021*).

The most dangerous time for light aircraft is on take-off and landing and hence these zones are critical for safe aircraft operations.

Lest there be any misunderstanding about the necessity of these safety zones there have been two crashes at Seething and one at Topcroft (adjacent to EPS sub-site 3A) where the presence of an effective PSZ were important.

It is worth exploring them as they are pertinent to the issue with sub-site 10B at Seething, being adjacent to a working runway.

Case Accident #1

AAIB Report		EW/G2006/05/19
Plane	Cessna F172m	G-BAOS
Date	30 May 2006 at 17:55	Seething

Light aircraft taking off from Seething experienced engine problems and had to crash land outside the airfield perimeter. To avoid a power line the pilot managed to crash land in a ploughed field just northwest of Upgate Farm.

The pilot and passenger survived, the plane was severely damaged.

Case Accident #2

AAIB Report		EW/C2008/10/04
Plane	Christen Eagle II	G-EGUL
Date	29 October 2008 at 13:49	Seething

A light aircraft while passing low over Seething Airfield collided with an agricultural tractor spraying the field at the end of the runway.

The tractor was not normally there, the pilot did not expect it to be there, he could not see it clearly and clipped it causing the plane to crash.

The pilot and passenger were both killed, and the plane was written off.

Case Accident #3

AAIB Report		EW/C2016/10/01
Plane	Mustang P-51D	G-MSTG
Date	2 October 2016 at 14:34	Topcroft Farm Airstrip

A WW2 American Mustang was returning to Topcroft Airstrip (adjacent to EPS sub-site 3A) and attempting to land. The first attempt was aborted and the pilot decided to go around again. Due to side winds, he was unable to execute the manoeuvre and clipped a tree beyond the runway, crashing the plane into the adjoining field.

The pilot was injured, the passenger killed and the plane written off.

These accidents do happen, as demonstrated in the last 20 years at Seething and Topcroft, when planes are taking off and landing – their most vulnerable time.

This was again illustrated with the recent fatal crash at New York LaGuardia airport where an Air Canada airliner hit a fire truck that it was not expecting to be there. Both pilots were killed as in Seething crash #2.

In accident #1 and #3 the ability to land in a clear, open field saved three lives. Had either crash landed on/in a Solar Farm with its hard structures the outcomes would most likely have been very different and three more lives would likely have been lost.

In accident #2 an unexpected and unusual activity (crop spraying) caused the crash that resulted in two deaths of very experienced, ex-RAF, pilots. Constructing and operating an active airfield directly adjacent to a Solar Farm with construction and maintenance activities using cranes, vehicles etc. gives ample opportunity for type of unexpected accident to be repeated. As it recently was at LaGuardia.

There is no mitigation proposed by East Pye for these PSZ issues. Without effective mitigation sub-sites 10 B,D and E should be removed from the Scheme.

(Please see Postscript in section 10)

Concluding Remarks

The proposed location of Site 10 of the East Pye Solar Farm Scheme is unsuitable and indeed potentially dangerous.

As a result, the inclusion of Site 10 within the Scheme should be rejected due to:

1. The safety concerns around sub-site 10B intruding into the Seething Airfield Public Safety Zone which concerns are not being mitigated in the proposed Scheme design.
2. The anticipated impact on wildlife, not just the resident Barbastelle bats maternity colonies but also other wildlife that currently roams the surrounding area and flourishes in the local woodlands and hedgerows. Where a proposed NSIP is located within overlapping Core Sustenance Zones for Barbastelle bats and directly adjacent to multiple ancient woodlands supporting maternity colonies, the impacts of construction disturbance, habitat fragmentation, lighting, noise and long-term landscape disruption are intrinsic to the scheme and cannot be reduced to a level that avoids adverse effects on the local Barbastelle population's favourable conservation status. As such, the effects are not capable of mitigation, and the Scheme is fundamentally incompatible with the Habitats Regulations.
3. The location of Site 10 sitting directly between two Conservation Areas in Seething and Hedenham would damage the rural environment for the long term negating and wholly contradicting the reasons for and purpose of these Conservation Areas.
4. Sub-site 10E is immaterial to the potential solar generation value of the Scheme and coupled with the additional construction disruption, cost, environmental damage and industrial sprawl that it would introduce are reasons why it should be removed from the Scheme. It is also within less than 150m of resident's homes.
5. Sub-site 10A has no acceptable access route and should be removed from the Scheme.
6. There are no documented provisions to manage the run-off water from Site 10 and the flooding risk it poses to Woodton village which already has existing flooding problems.
7. Local businesses, notably those associated with South Norfolk's important tourism industry, will be severely and detrimentally impacted both during the Scheme's construction phase and throughout the operational phase of the Scheme because of the industrialisation of the landscape. There are no specific proposals for appropriately compensating these businesses nor indeed for homeowners who are likely to find their properties both devalued and considerably more difficult to sell.

Notwithstanding the specific concerns discussed in this report in respect of Site 10 of the East Pye Solar Scheme, it should be emphasised that the residents of Hedenham Parish fundamentally object to the Scheme as a whole. The reasons for this rejection of the proposals have been highlighted in submissions by Block East Pye Solar (BEPS), the Relevant Representation previously submitted on behalf of Hedenham Parish in June 2026 and in the numerous Relevant Registrations also submitted in June 2026 by South Norfolk residents and others including residents of this Parish.

9. Post Script comments

Since this report was first prepared, two issues have evolved that need to be drawn to the Planning Inspectors attention.

9.1 Wash Lane Seething

In section 6.3 the suitability of the access points into the land locked site 10A was questioned, especially since Wash Lane is a byway.

Subsequently South Norfolk District Council have requested an enhanced site visit with the Planning Inspectors to Wash Lane in Site 10 in their Procedural Deadline A Submission dated 1st September 2026. SNDC are specifically concerned about a “Major Adverse significant visual impact”.

During this Inspector visit the suitability of the proposed crossing points into site 10A need to be examined with reference to their suitability, likely construction impact and legal standing.

The Parish of Hedenham would like to attend this Inspectors site visit to explain the issues around this remote rural byway.

9.2 Seething Airfield safety issues

In section 8.3 the safety concerns around the runways at Seething were highlighted.

Since this document was first written there has been some movement as follows:

- Seething Airfield Flying Club registered concerns, like ours, to the proposed design and proximity to required emergency landing zones *
- East Pye prepared an expert aviation witness report examining engine failure on take-off
- East Pye offered limited mitigation of panel removal in a corner of Site 10 B within their new Master Plan Maps dated April 2026 and shown below:



Observations & Objections submitted in response to East Pye Solar Farm Site 10 proposal

- Seething Flying Club do not agree with the expert witness report or the effectiveness of the proposed mitigation measure – “planes don’t always crash to the left”
- At the Preliminary Meeting it became apparent that East Pye were focusing on Tibenham Gliding Club and the General Aviation Council. The Applicant was asked at the preliminary Meeting if they were engaged with Seething Flying Club. In response The Applicant stated that they were not currently engaging with this Flying Club.
- The Inspectors have requested, in their ExQ1 dated 23 September 2026 (point 4 Q1.4.1 item c) that the Applicant must now engage with Seething Flying Club on specific emergency landing areas etc. See below:

ExQ1: 23 September 2026

Responses due by deadline 1: 6 October 2026

ExQ1	Question to:	Question:
Q1.3.2	The applicant	Relative influence of environmental and deliverability considerations The applicant is requested to explain the relative influence of environmental assessment, engineering requirements, grid connection considerations, landowner willingness, and land availability in the identification and selection of the Order limits. In particular, the applicant should clarify whether the preferred site was selected principally because it represented the environmentally preferable option or because it offered operational, engineering and grid connection advantages, and whether environmental suitability or land availability was ultimately the determining factor in defining the proposed development.
4. Aviation		
Q1.4.1	The applicant	Aviation safeguarding and aviation safety The ExA notes the submission of the Applicant's Position Statement on Aviation at Procedural Deadline A [PDA-006], which provides additional information regarding aviation safeguarding and aviation safety matters. The ExA welcomes the further explanation provided. However, aviation safeguarding remains a key matter arising from RRs and discussions at issue specific hearing 1, and the ExA considers that further clarification and consolidation of the applicant's case would assist the examination and ensure that the effects of the proposed development on aviation interests are fully understood. The applicant is therefore requested to provide a comprehensive response which demonstrates the progress made since submission of the application and clearly explains the current position regarding aviation safeguarding. In particular, the applicant should: - Identify all elements of the proposed development that may affect aviation interests, including solar arrays, BESS infrastructure, substations, buildings and any other relevant structures. - Provide a consolidated explanation of the assessment undertaken in relation to emergency landing scenarios, engine-failure-after-take-off scenarios, glider launch failure scenarios, and turbulence and wind-shear effects. - Respond in detail to the matters raised by the General Aviation Awareness Council in its RR [RR-0664] and during issue specific hearing 1, including concerns regarding the safeguarding of Tibenham and Seething airfields, emergency landing areas, the location of solar arrays, BESS infrastructure and substations, and aviation safety risks associated with engine-failure scenarios. - Confirm whether the applicant intends to prepare and submit a consolidated standalone aviation safeguarding and aviation safety document during the examination and, if not, explain why this would not assist the ExA and the Secretary of State for Energy Security and Net Zero. The response should clearly identify any outstanding disagreements and explain how the applicant intends to address them during the examination.
5. Climate change		
Q1.5.1	The applicant	Greenhouse gas assessment and climate resilience

This critical safety issue still needs to be resolved with Seething Flying Club as it has a significant impact on the suitability of the installation of solar panels on Site 10 .

- If the inspectors are to have a site visit to Wash Lane, as requested by SNDC above, then an onsite review of the proximity of the runway end to the solar panels might be helpful - the airfield is adjacent to Site 10 and close to Wash Lane.